Implementing reform in the New South Wales greyhound racing industry

Report to the interim Chief Executive of Greyhound Racing NSW from the Joint Working Group

29 January 2016
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Executive summary

Greyhound racing in New South Wales (NSW) is changing. The Joint Working Group (JWG), established in November 2015, has undertaken investigation of a range of options for reform. This report provides recommended actions to drive reform of the greyhound racing industry. These reforms put animal welfare at the centre, supported by good governance and effective regulation which are underpinned by strategies to ensure the financial sustainability of the greyhound industry into the future. The JWG recognised the importance of effective communication and education for industry to achieve the necessary culture change to underpin and drive these reforms. This is to align the industry with community expectations, and to meet ethical commitments and social, financial and legal obligations.

The JWG is cognisant that many of the recommendations in this report will require investment. Moving forward, the first call on GRNSW finances must be greyhound welfare and regulation. However, there is also a need to improve the quality of NSW greyhound racing tracks and to raise prizemoney levels towards those available in Victoria and Queensland. While there may be scope for savings through consolidation in the number of tracks, there will likely be a need for the industry to significantly increase its revenues and financial capacity. The JWG did not discuss the current terms of the Inter Code Agreement (ICA) in any detail. However, an ICA that allocates funds on the basis of each codes’ share of wagering could go a long way towards financing reform.

This report describes the considerations and recommendations of the JWG on the options available to Greyhound Racing NSW (GRNSW) to implement the strategies articulated in the Strategic Plan. These include recommendations on the:

- implementation of a new governance model
- development of NSW greyhound clubs and their tracks and facilities as Centres of Excellence
- improvement of the wagering and financial reward landscape in NSW.

The JWG has also considered, and provides recommendations in this report, on best practice grading systems aimed at improving animal welfare outcomes in the industry. This report also provides suggestions as to practical steps to be taken to address the over-production and unnecessary euthanasia of greyhounds.

The JWG is firmly of the view that animal welfare is at the centre of the reform agenda and accordingly all actions are aimed at achieving improved animal welfare. In its investigation and analysis of reform options the JWG recognised that there is a strong interplay between each of the strategic objectives. As a consequence, each reform action is required to be developed and implemented with regard to all other actions. Their implementation will need to be appropriately sequenced and a comprehensive transition plan agreed. An indicative implementation timeline has been prepared for consideration by GRNSW.
### Figure 1: Implementation actions and timeline

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<td><strong>Recommendation 7:</strong> Prepare a Metropolitan Racing Strategy</td>
<td>L. Draft amendments to Act</td>
<td>M. Develop skills matrix to be used for board appointments</td>
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<td><strong>Recommendation 8:</strong> Introduce new organisational structure</td>
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The work of the JWG has been underpinned by a shared vision among members:

*Greyhound racing in NSW is a vibrant modern sport that demonstrates the highest standards of integrity and puts animal welfare at the centre.*

The JWG agreed a clear vision is required to provide a guiding aspirational statement to galvanise all industry participants around a single reform platform.

The concept underpinning the recommendations in this report is illustrated in Figure 2.

Figure 2: The interlinking dimensions of reforming the NSW greyhound racing industry

‘Wastage’ of greyhounds is at the centre of animal welfare concerns

With animal welfare at the centre of a sustainable greyhound racing industry the JWG has considered a number of options relating to management of the greyhound lifecycle, with a focus on reducing overproduction and unnecessary euthanasia.

The JWG has considered this issue from the perspective of the greyhound lifecycle, including the role of regulation in breeding, the transfer of greyhounds between participants, and providing incentives aimed
at reducing unnecessary euthanasia. The JWG considers that the following factors at the various stages of the lifecycle have contributed to the ‘wastage’ of greyhounds:

- the over-production of greyhounds whereby more greyhounds are bred than required to provide a sustainable greyhound racing industry
- the unnecessary euthanasia of greyhounds, which is partly a result of over-production, the lack of racing options for less competitive and older greyhounds, and insufficient options for younger greyhounds to get their first start.

Of paramount concern to the JWG is the high percentage and number of greyhounds that do not make it to the track, particularly as this often results in euthanasia.

The JWG considers that actions are required to improve the monitoring and regulation of greyhounds, and the licensing and regulation of greyhound participants, across the entire lifecycle. This is to include the public reporting of a suite of performance measures documenting the greyhound lifecycle. Further, there is a need to reduce the number of greyhounds bred each year to a level that provides adequate numbers for racing, while reducing unnecessary euthanasia. In addition, effort is required to increase the adoption of greyhounds.

Separately, there is a need to introduce minimum standards for greyhound participants to accompany the licensing across the lifecycle. This should be in the form of a single licence, with participants approved for lifecycle stages.

**Recommendation 1**

The JWG recommends that GRNSW expand greyhound registration and monitoring to cover the entire lifecycle. This is to encompass:

- registration and monitoring of greyhounds, and periodic assessment of greyhounds at key lifecycle stages by integrity and compliance officers
- identification of animal welfare and development performance measures related to key stages of the lifecycle
- collection, analysis and public reporting of performance measures in either the GRNSW Annual Report, or a separate publication.

**Recommendation 2**

The JWG recommends that GRNSW expand the licensing of greyhound handlers to cover the entire lifecycle, including:

- the introduction of minimum standards, together with the completion of an educational qualification (with exemptions available for recognition of prior learning)
- introduction of a single licensing process for greyhound handlers, with handlers approved only for those components of the lifecycle for which they have applied and been approved
- having licensing tiers – for hobbyists and professionals – with their differential requirements reflecting the different standards required
- periodic licence renewal being subject to appropriate greyhound outcomes.
Recommendation 3
The JWG recommends that the development and introduction of the minimum standards required as part of Recommendation 1 be:

- informed by further consultation by GRNSW, including with experts from across the lifecycle
- accompanied by an education campaign for greyhound handlers focussed on improving awareness of the reforms and their rationale, particularly during the phase-in period
- accompanied by the development of appropriate educational materials and training programs, providing participants with the requisite knowledge and skills to meet the new standards
- expansion of public reporting related to the regulation and licensing of greyhound handlers.

Recommendation 4
The JWG recommends:

- GRNSW obtain legal advice on the most appropriate process to introduce a quota, including whether a breeding quota is legally enforceable under existing New South Wales and Commonwealth Government legislation and specific legislative amendments that may be required.
- drawing either from the impending findings of the current Greyhounds Australasia project, or separate analysis, GRNSW should immediately undertake estimation of a state-wide breeding quota. This analysis should also identify an appropriate phase-in period.
- the quota be reviewed every six months, and that the quota system to be reviewed two years after commencement to assure its effectiveness.
- GRNSW undertakes further analysis to identify the merits and practicalities of implementing the state-wide breeding quota through either a centrally determined allocation to breeders, or an auction process. Under both approaches there should be separate allocations and procedures for ‘hobby’ and ‘professional’ breeders.
- that GRNSW advocate for the introduction of a national breeding target with Greyhounds Australasia and its member organisations.

Recommendation 5
The JWG recommends:

- GRNSW investigates the success of greyhound re-homing activities undertaken in the United States and other international jurisdictions as well as across Australia, to identify best practices that could be effectively applied in NSW.
- Further investigation be undertaken by GRNSW on options for financing greyhound re-homing, including an optional levy for owners at the naming of greyhounds, application of a prizemoney levy, or an increased registration or licence fee for owners.
- Advocate with Greyhounds Australasia and its member organisations for the introduction of a nationally consistent approach to greyhound adoption.
- GRNSW increase its efforts at enhancing public perceptions of the greyhound breed for adoption, and take action to increase access to greyhound adoption in regional NSW.
- GRNSW support the expansion of greyhound re-homing through identification of suitable locations to provide access to the Greyhounds as Pet program, with a particular focus on regional NSW.
A new Centres of Excellence model is required for the industry to be sustainable

Significant change is required to the current network of 34 tracks if the industry is to be sustainable into the future. To this end a shift is required from the current network to a smaller number of tracks of which most will need to become Centres of Excellence.

The JWG had extensive discussions about the objective of a Centres of Excellence model, how the centres would be defined and how the transition from the current clubs based model to a Centres of Excellence model would occur.

The JWG is clear that the required standard of infrastructure and facilities cannot be implemented or sustained across all current tracks. The JWG identified a range of characteristics of Centres of Excellence encompassing racing facilities and track standards, and non-racing facilities and support services. Further, the JWG suggests a model that includes Centre of Excellence Hub and Spoke tracks to ensure State-wide access to greyhound racing. The facility needs for metropolitan racing should be informed by GRNSW preparing a Metropolitan Racing Strategy.

Building on the operational standards of existing TAB tracks, Centre of Excellence tracks should have the following characteristics:

- the best-practice track design, camber and set out, which minimises the risk of greyhound injury. Determination of the appropriate track design will be based on research that indicates which tracks are the safest
- application of best-practice maintenance standards, which may require the appointment of a full-time track curator with appropriate qualifications to cover each Centre of Excellence facility
- best-practice kennel facilities, with specific standards to be identified
- hold meetings at least twice a week
- facilities for trialling, with time set aside outside of race meetings for this purpose.

The JWG also considered that Centre of Excellence tracks should only host TAB racing. This would bring NSW into line with Victoria, where there is no non-TAB racing.

Centres of Excellence should also feature a wide range of non-racing facilities, including, at a minimum:

- facilities to support the delivery of education programs to trainers, owners and other greyhound participants
- greyhound education facilities, including socialisation areas and training (e.g. habituation lessons to teach kennelling), breaking-in facilities and a slipping track
- on-site veterinary clinic, which is open during business hours, with emergency options. This will include a veterinarian being present during racing, trialling, and for private consultations. The veterinarian would also play a role in the delivery of education programs, and support Greyhounds As Pets (GAP)
- hospitality facilities, which can be used on race days, as well as for community events and functions. These facilities will provide an opportunity for raising community awareness of greyhound racing
- Facilities for GAP, providing access to staff trained in behavioural assessment, providing surrender points for trainers. These facilities may provide fostering or rehoming (depending on regional adoption demand) or transport to major GAP facilities near Sydney. The facility may also
provide a base for community engagement focussed on increasing awareness of greyhound adoption as an option in the community.

**Recommendation 6**

The JWG recommends that GRNSW undertake further specification and analysis of the Centre of Excellence concept. This further work should identify:

- the optimum number of race meetings, and type, required to be supported by the track network
- the specific features of a Centre of Excellence including facilities to support education programs, greyhound education facilities, onsite veterinary clinic, hospitality and Greyhounds As Pets facilities
- the locations of Centre of Excellence Hub and Spoke tracks
- indicative costs of establishing and operating a Centre of Excellence facility
- the financial and other resources potentially available to finance the development and operation of Centre of Excellence tracks.

**Recommendation 7**

The JWG recommends that GRNSW prepare a Metropolitan Racing Strategy, detailing the vision for future metropolitan racing, and identifying facilities and other infrastructure required.

**A new governance model will restore community trust in GRNSW**

The JWG considers that a new governance model is required. There needs to be a demonstrable change to current organisational arrangements to restore community trust and to satisfy the expectation that the industry will undertake significant reform.

The JWG developed three options for consideration:

1. the current structure with GRNSW performing both commercial and regulatory functions, with enhanced governance arrangements and an organisational structure that more clearly separates the regulatory function and the commercial function
2. a new structure that separates the regulatory functions for each of the three racing codes into a separate independent regulator responsible for regulation of racing in NSW
3. a new structure that establishes GRNSW as the commercial industry development body (GRNSW Commercial) responsible for the conduct of race meetings, and establishes a new and separate regulatory agency (Greyhound Racing Regulation).

The JWG agreed that the first option is preferred and that this option would be supplemented by new Board arrangements that include separate sub-committees for Commercial and Regulatory functions. The organisational structure should more clearly separate these functions. The preferred option is
illustrated in Figure 3. A feature of this structure is that regulatory subcommittee would comprise GRNSW Board members, as well as independent regulation experts. This subcommittee could be modelled on the Greyhound Racing Victoria (GRV) Integrity Council.

The JWG agreed the Board composition would be enhanced with the addition of membership by suitably qualified and skilled people with industry experience. This would improve governance and enhance industry engagement. The JWG also considered the necessary skills and pre-requisites to be eligible for appointment to the Board. The JWG reviewed the current arrangement whereby a selection panel makes recommendations to the Minister and it was agreed this arrangement provides the right balance of independence and transparency and should be continued, but with stricter adherence to selection criteria. The JWG also emphasised the need for diversity of Board membership.

Increased accountability and transparency through better reporting to government and to the public is required to avoid the mistakes of the past. Reporting against progress on implementing the Strategic Plan is particularly important. It was agreed there should be some specific animal welfare and integrity measures developed to assess the outcomes achieved. The JWG also took the view that a more complete performance measurement and reporting framework is required which demonstrates the new regulatory activities and reports the activities of clubs. This increased level of public reporting was considered an important indication of transparency and would demonstrate a willingness to be subject to public scrutiny.

The JWG considered increased accountability and transparency is required to restore community trust and to ensure the momentum for reform by GRNSW and the industry. It was felt this was a critical element to ensure the required culture change across the whole industry is realised.
The JWG also considered the arrangements relating to integrity oversight in the industry and again thought that a new approach should be introduced with the appointment of an Integrity Commissioner who is able to investigate complaints about integrity and welfare issues at arm’s length from GRNSW. This position could be modelled on the Victorian Racing Integrity Commissioner, which covers all three racing codes. The position could include oversight of the three racing codes.

The JWG considered this improvement would enhance the overall governance and regulation of the industry and would complement the institutional arrangements. The group was of the view that it was important to have a separate complaints body where GRNSW is recommended to continue as a single organisation responsible for both commercial and regulatory functions.

Enhanced engagement with industry and the community was a theme that came through a number of the discussions of the JWG. The Greyhound Racing Industry Consultation Group (GRICG) is not appropriate in its current form.

**Recommendation 8**

The JWG recommends a new structure for GRNSW that maintains both the regulatory and commercial functions with more definite structural separation.

**Recommendation 9**

The JWG recommends:

- a new board structure that includes five independent and two independently selected industry representatives
- a skills matrix for the Board that includes specific finance, risk, governance, community relations, marketing, legal and regulatory skills and animal welfare experience
- that only those with suitable qualifications be eligible for board appointment
- the continuation of the current board selection arrangements with a focus on diversity.

**Recommendation 10**

The JWG recommends:

- enhanced transparency and accountability through increased frequency and expanded reporting by GRNSW to government, the public and the industry, including the development of a comprehensive reporting framework that addresses regulation throughout the lifecycle
- reporting publicly on a number of specific animal welfare reporting measures including, injury, fatalities and injury related euthanasia
- reporting publicly against the strategic plan to demonstrate improvement.

**Recommendation 11**

The JWG recommends the appointment of a greyhound racing Integrity Commissioner.

**Recommendation 12**

The JWG recommends the establishment of a new Advisory Committee, potentially called the Greyhound Racing Strategy Advisory Committee.
A move to establish Centres of Excellence calls for improved club governance

The JWG considered the extent and nature of control GRNSW should have over greyhound racing clubs and how they operate. It was agreed that higher standards in respect of club registration and eligibility for registration should be adopted. The JWG is of the view that the improvements made by GRNSW to club governance requirements for new clubs should also be applied to the registration of all clubs as the industry moves to the Centres of Excellence model.

The JWG has mixed views as to whether the move to Centres of Excellence should also include a major structural change to the industry by moving away from a clubs model to a centralised model in which GRNSW is responsible for all aspects of racing operations. The JWG noted that any such structural change would require legislative change and an appropriate appeals process.

The JWG is concerned that a move away from the clubs model will affect the willingness of volunteers to continue to contribute as they currently do and that the local community involvement and engagement would be adversely affected.

There were some views that GRNSW should have more central control of education centres and have central responsibility for trialling of greyhounds. These measures were also seen as part of improved lifecycle management of greyhounds.

The JWG noted that the club governance issue is linked to the structural changes recommended for GRNSW and is part of implementing the new Centres of Excellence model.

**Recommendation 13**

The JWG recommends minimum club board requirements include a 5 to 7 member board. At least 2 to 3 board members should be independent directors with a mix of skills that draws on the business acumen of the local community and recruited by a committee that includes a GRNSW representative. It may be appropriate for independent members to be identified using a recruitment firm.

**Recommendation 14**

The JWG recommends:

- an enhanced club governance model be adopted with clubs required to introduce a standard constitution
- GRNSW develop a new club reporting framework to increase accountability of clubs which could include risk management plans and financial accounts
- GRNSW play a role in the selection of the club Board and Manager
- the legislation be changed to enable GRNSW to conduct race meetings in the event that a club has failed, or is unable to meet its obligations.
Best practice grading system

To support the current GRNSW grading policy review, the JWG has considered a range of reforms to the NSW grading system. This has included reviewing the features of grading systems in other jurisdictions and codes, alongside consideration of the NSW context. A particular concern of the current NSW grading system is that GRNSW estimates 60-70 per cent of greyhounds are fifth grade. There is significant variation in the competitiveness of greyhounds in this single grade.

The JWG considers that animal welfare objectives should be explicitly stated within the aims of the GRNSW grading policy. It is also necessary for grading to better cater for the following types of greyhounds:

- juvenile greyhounds, with the current grading rules, in combination with race programming, often placing young and inexperienced greyhounds into fifth grade before they are ready. A consequence is that greyhounds of proximate ability are not always matched within races
- older greyhounds, with the current grading system not supporting the extension of greyhound racing careers
- weaker and less competitive greyhounds, who often are unable to get a start.

Accordingly, the JWG considers that any changes to NSW grading policy should be:

- simple and objective
- provide for separate grading of juvenile, older and other weaker and less-competitive greyhounds
- give incentives for greyhounds to race longer and maximise racing longevity
- ensure races are a relatively equal playing field.

The JWG considers that changes to grading policy cannot be considered independently of race programming. Programming must support the achievement of the aims of the grading policy, and animal welfare objectives more generally. In particular, it is important that programming better reflect the characteristics of all greyhounds, and not just the better performers.

Moving forward, it is imperative that programming is used to enable the less-competitive and younger greyhounds to race. This will likely require GRNSW to indicate to clubs its expectations of future race programming. It may be necessary for GRNSW to intervene with club programming to ensure the necessary changes are made.
The future sustainability of the industry also requires improving the wagering and financial rewards landscape

To ensure the future sustainability of the NSW greyhound racing industry, it is necessary to improve the wagering and financial reward landscape. This includes developing the wagering product on offer to appeal to wagerers and attendees alike, and potentially changing how prizemoney is allocated to attract greater participation and make the sport more sustainable.

The JWG considers that a review is required to identify how best to increase average prizemoney per race. A particular objective for the review should be to move towards minimum prizemoney for first place being $1,000, alongside a fixed distribution of prizemoney between first, second and third place. As part of this review, and in conjunction with the development of a Metropolitan Racing Strategy, consideration should also be given to prizemoney levels for metropolitan racing.

The JWG also considered ways to improve the quality of racing from a number of perspectives. This includes reducing track-related interference, increasing average field sizes (such that more races have 8 greyhounds), and increasing the quantum of distance racing. The JWG was unable to identify specific actions, with this issue requiring further analysis by GRNSW.

Recommendation 15
The JWG recommends that GRNSW amend the aims of the grading policy to include the objective: ‘Provides the opportunity for the greatest possible number of greyhounds to participate in racing, irrespective of their racing capability, age or experience.’

Recommendation 16
The JWG recommends that GRNSW, as a matter of priority, finalise the NSW grading policy review, giving consideration to the following:

- Integrate the masters guideline into the grading policy, with the racing requirements of older greyhounds primarily considered through programming initiatives.
- Consider the introduction of additional grades, such that younger and less experienced greyhounds, as well as less competitive greyhounds, are protected and compete against greyhounds of their own age and ability longer.
- Undertake further analysis to determine eligibility requirements for all grades.

Recommendation 17
The JWG recommends that GRNSW:

- Develop specific objectives for race programming, to be applied by clubs in future programming decisions.
- If necessary, proactively influence club programming in the future to ensure the objectives underpinning grading policy changes can be achieved.
- Examine the feasibility, financial implications and outcomes of introducing preferential box draws and six starter races.
Finally, the JWG is of the view that there needs to be an increase in access to wagering on greyhound racing, as well as video streaming of races. In response, the JWG identified the following potential actions:

- improve ‘The Dogs’ product (both smartphone application and website) to facilitate wagering. This could comprise tendering wagering access to ‘The Dogs’ product, or even using the site as an open market place for all wagering operators
- work in conjunction with Sky channel and their affiliates for broader coverage among the various wagering operators across Australia and globally.

**Recommendation 18**

The JWG recommends that GRNSW:

- undertake a review of prizemoney with a view to increasing average prizemoney per race, while being consistent with other elements of the reform package
- considers application of a flatter prizemoney schedule with a minimum prizemoney target of $1,000 to the winner of TAB races, alongside fixed proportions for prizemoney distribution for places.
- as part of the preparation of the Metropolitan Racing Strategy (see Recommendation 7), that the metropolitan prizemoney distribution model be reviewed. This should identify the best and most appropriate format, alongside consideration of grading approaches and how metropolitan racing might be best showcased.

**Recommendation 19**

The JWG recommends that GRNSW undertake, or commission, further analysis to:

- identify specific proposals to reduce track-related interference
- identify actions required to support increased distance racing across the greyhound lifecycle, programming and other industry elements
- identify an optimum number and mix of races
- identify the feasibility of introducing straight track racing, including for 10 starter races.

**Recommendation 20**

The JWG recommends that GRNSW undertake, or commission, the development of a financial model that allows for detailed examination of the following issues:

- financial resources required for greyhound welfare and regulation, and resources available for other initiatives
- sensitivity of industry revenues to changes in race numbers and programming
- identification of the optimal number of tracks, and the number of meetings at each track
- financial impact of different standards of Centres of Excellence
- changes to prizemoney allocation.
These recommendations provide a comprehensive action plan for greyhound racing industry reform

The JWG recognises that there is a strong imperative for change and that the industry needs to drive that change through addressing the regulatory framework, the conduct of all industry participants and the culture of the industry to put animal welfare at the centre.

The JWG is confident that implementing our recommended actions will achieve lasting change in the industry, restore the community mandate and make the industry financially sustainable into the future.
1 Greyhound racing in NSW is changing

1.1 The Joint Working Group

In November 2015 Greyhound Racing NSW (GRNSW) established a Joint Working Group (JWG) to investigate, develop and provide recommendations to the GRNSW interim Chief Executive on achieving the strategic direction for greyhound racing in New South Wales (NSW). These recommendations are focussed on specific actions that should be taken by GRNSW, and the industry more generally, to achieve the two over-arching objectives of:

1. achieving and maintaining best practice animal welfare standards
2. ensuring a financially sustainable greyhound racing industry into the future.

The outcomes of the JWG will be used to inform submissions from GRNSW to the NSW Government Special Commission of Inquiry into the greyhound racing industry (the Special Commission), and the GRNSW response to the Special Commission’s findings and recommendations. The Special Commission was established in response to the ‘live baiting’ scandal that arose in February 2015, and is focused on “issues relating to the governance, integrity and animal welfare standards of the greyhound racing industry in NSW.” Most importantly, the outcomes of the JWG will be used to set the future strategic direction of the greyhound racing industry.

1.1.1 Terms of Reference

A detailed Terms of Reference (TOR) is provided at Appendix A. The TOR requires the JWG to consider and provide advice to the GRNSW interim Chief Executive on the options available to implement the strategies articulated in the Strategic Plan:

- the development of NSW greyhound tracks as Centres of Excellence
- the improvement of the wagering and financial reward landscape in NSW
- the implementation of a new governance model, including, but not limited to, the appropriate structure of industry administration, particularly the operation and control of race clubs and meetings.

The JWG was also asked to identify and provide recommendations on best practice grading systems aimed at improving animal welfare outcomes in the industry. This is to be informed by a comparative assessment of grading systems within Australia and selected international jurisdictions. The views of the JWG with respect to grading will be considered as part of a grading policy review.

Finally, the JWG is to develop practical steps, actions and/or initiatives which can actively be taken to abolish (or otherwise lessen substantially) the overproduction, and unnecessary euthanasia, of greyhounds.

The Terms of Reference for this report were deliberately silent on enforcement and integrity actions that should be taken by GRNSW. These issues are being addressed in separate work related to the Special Commission. However, issues associated with enforcement and integrity are addressed insofar as they are related to GRNSW powers.

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1.1.2 Membership of the Joint Working Group

The JWG comprises representatives from GRNSW, industry, and the wagering, media and animal welfare sectors. A list of JWG members is contained in Appendix C.

1.1.3 The approach taken by the Joint Working Group

The JWG met in four day-long workshops, discussing each of the areas identified in the TOR. The meetings took the approach of first identifying relevant issues from the perspective of members, and then moving to identifying potential actions to be taken by GRNSW and industry to address these issues. A strong emphasis was placed on narrowing down the issues to those considered most relevant and identifying actions likely to be effective to secure the future sustainability of the NSW greyhound racing industry.

The deliberations of the JWG were also informed by three sets of stakeholder consultation led by GRNSW. This comprised written and verbal feedback on a discussion paper in early December 2015, written feedback on the JWG draft report in early January 2016, and feedback provided in four meetings held in regional NSW in early January 2016.

The JWG was briefed on the key findings from this stakeholder feedback. The JWG noted the widespread call for improved communication between GRNSW and the community, a point that is reflected in several recommendations. The stakeholder feedback also highlighted that some of these issues being considered, such as addressing over-breeding, are relatively complex, with education and public awareness activities required.

A summary of the feedback from this consultation is provided in Appendix D.

1.2 The imperative for change

A key issue raised at the Special Commission is that in the absence of wide-ranging and comprehensive reform actions aimed at addressing animal welfare issues – namely reducing over-breeding and unnecessary attrition of healthy greyhounds – the sustainability of the NSW greyhound racing industry is at risk.

Analysis undertaken for GRNSW indicates that even before the ‘live baiting’ scandal arose, the financial sustainability of the greyhound racing industry was not strong. This is a consequence of weak growth in wagering revenues across all racing codes combined, ageing infrastructure and the ageing of industry participants. It is expected that the findings and recommendations of the Special Commission will necessitate GRNSW increasing its animal welfare activities, including education and enforcement activities. This will require a significant increase in operating budget for these activities.

There are also a number of challenges associated with continuing to provide the infrastructure required to provide a safe racing environment, and to attract participants to greyhound racing tracks into the future. For example, it is necessary to reflect in capital planning that the lease for the state’s premier track – Wentworth Park – expires in 2027. Without an extension of the lease it is difficult to justify significant capital expenditure at Wentworth Park. Separately, a number of racing tracks and associated facilities across the state are considered to be of a poor quality, and not suitable for greyhound racing into the future.

All these issues combine to create an impetus for the industry to increase revenues, and ensure it has the financial resources and capacity required to meet the required operating and capital expenditures into the future. There is limited scope for these operating and capital expenditure requirements to be
met from reallocating GRNSW operating expenditures away from prizemoney (which accounted for 68 per cent of GRNSW operating expenditure in 2014-15). This is because prizemoney levels in NSW greyhound racing are already considerably less than in other Australian states, particularly Victoria. In 2014-15 prizemoney allocated by GRNSW averaged $1,854 per race, compared to $3,289 per race in Victoria. Successful change requires reform across interlinking dimensions.

1.3 Successful change requires reform across interlinking dimensions

The work of the JWG has been underpinned by a shared vision among members:

*Greyhound racing in NSW is a vibrant modern sport that demonstrates the highest standards of integrity and puts animal welfare at the centre.*

A clear vision is required to provide a guiding aspirational statement to galvanise all industry participants around a single reform platform.

In addition to the vision, the culture within the industry needs to change. There is no room for traditional beliefs in training and breeding habits and what has been seen as an acceptable level of attrition and harm in the greyhound lifecycle. The JWG recognises that changing the culture of the industry is fundamental to the success of the reforms and that it is up to each participant to be part of that culture change if the industry is to continue to have a mandate from the community.

The JWG supports the current initiatives being undertaken to educate participants such as training seminars and initiatives to engage the community. Continued emphasis on participant education is a significant lever for GRNSW to influence industry and to change the industry culture.

A central tenet of the JWG considerations is that animal welfare is at the centre of reform.

The regulation and standards provide an overarching framework in which the industry operates while wagering and financial settings are critical underpinnings to the ongoing viability of the industry.

The dynamic interplay of governance, clubs structures, racing itself, and the actions of participants creates the complex environment in which the current challenges have emerged. It also provides a useful framework in which reforms can be considered.

The interdependency between all these elements of reform: animal welfare, wagering and financial sustainability is illustrated in Figure 4. Also highlighted, is the need to engage with the community, both to ensure acceptance of greyhound racing as an ethical and sustainable industry, and to increase community involvement in greyhound racing.
1.4 The GRNSW strategic plan

1.4.1 Overview
GRNSW has developed a high level strategic plan identifying the issues being faced by the NSW greyhound industry, and the actions required to address these issues (see Figure 5). Three key issues identified in the development of the strategic plan were:

1. the current level of oversight and standards in the industry need to be raised to improve the welfare and integrity and governance of the sport
2. the structure of the club network in the long term will not be financially sustainable given the level of investment required to improve standards
3. the industry has an aging participant demographic and is not attracting sufficient levels of new participants.
This report builds on the strategic plan by providing an implementation plan, including greater specificity on actions, and an implementation timetable.

It is noted that both the strategic plan, and this implementation plan, are subject to change in response to the findings and recommendations of the Special Commission. For example, a key consideration will be the financial resources required to improve animal welfare and compliance – only after establishing the resources required for actions in these areas will it be possible to identify what can be realistically achieved in areas such as prizemoney, track infrastructure and facilities.

Figure 5: Greyhound Racing NSW strategic plan


1.4.2 Action areas identified in the strategic plan

The strategic plan identifies a number of action areas, three of which are part of the JWG Terms of Reference:

- Position NSW greyhound clubs or tracks as Centres of Excellence:
  - optimise the number of clubs or tracks across NSW
  - ensure clubs are managed by individuals with appropriate qualifications and experience
  - standardise infrastructure and facilities across all clubs
  - improve independent financial position of clubs
  - integrate clubs with local stakeholders.

- Improve the wagering and financial reward landscape in NSW:
- Improve the wagering product
- Increase accessibility to bet and view
- Build GRNSW’s online and digital footprint
- Expand GRNSW’s product into the international market
- Maximise reward and prizemoney allocations.

Implement a new governance model to address the changing industry structure:
- Ensure governance structure is appropriate to achieve the long-term objectives of the sport and GRNSW
- Identify potential opportunities to secure additional sources of funding.

Finally, the JWG Terms of Reference requests that the report also cover two issues not identified in the strategic plan – reforms to grading policy and reducing over-production and unnecessary euthanasia.

1.5 Structure of this report

This report is structured as follows:

- Section 2 provides a plan to be used by GRNSW to guide its implementation of actions recommended by the JWG.
- Section 3 identifies actions required to place animal welfare at the centre of the industry, including reducing animal injuries, over-production and unnecessary euthanasia.
- Section 4 develops criteria and actions that can be used to position NSW greyhound racing tracks as Centres of Excellence.
- Section 5 identifies the range of actions required to implement regulatory and governance reform.
- Section 6 identifies reforms to grading systems that should be considered by the grading policy review.
- Section 7 identifies actions that can be taken to improve the wagering and financial reward landscape.

There is much inter-dependency between various action areas within this report. A case in point is reforming the grading system. It is widely considered that successful reform of the grading system will affect the racing careers of younger, older and less-competitive greyhounds, having positive implications for unnecessary euthanasia, prizemoney and the wagering product.
2 Implementing reform will require focussed action

2.1 Reform initiatives

The JWG developed 20 recommendations for consideration by the interim CEO of GRNSW for reform of the NSW greyhound racing industry. Implementation of these reforms will require much effort and focus, from GRNSW, the New South Wales Government and industry participants. A detailed summary of all recommendations is provided in Appendix E.

2.2 Overall implementation plan

A summary of all recommendations, and 21 implementation actions and timelines is provided in Figure 6. All recommendations should be acted on in 2016, with the majority progressed in the first quarter.

The majority of these actions can commence prior to the release of the Special Commission of Inquiry report. Several actions address more than one recommendation. For example, Action A (Development of a new regulatory, monitoring and reporting framework encompassing greyhounds, participants, clubs and GRNSW), will be used to implement recommendations 1, 10 and 14.

The timelines in Figure 6 have been identified to:

- focus initial effort on the actions that will have most impact on achieving the overarching outcomes of improving animal welfare and the financial sustainability of the industry
- prioritise quick wins
- manage dependencies and risks.

An important activity cutting across the entire reform effort is the need to bring the community and industry along the reform journey to place animal welfare at the centre, and to ensure the industry’s financial sustainability. The JWG has benefited from industry consultation as part of the development of these recommendations. These efforts will need to continue, particularly with respect to developing the Centres of Excellence concept, using programming to enhance animal welfare, and improving race quality.
### Figure 6: Implementation actions and timeline

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>Q1</th>
<th>Q2</th>
<th>Q3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recommendation 1: Expand greyhound registration and monitoring to cover the entire lifecycle</td>
<td>A. Develop new regulatory, monitoring &amp; reporting framework encompassing greyhounds, participants, clubs &amp; GRNSW</td>
<td></td>
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<tr>
<td>Recommendation 2: Expand licensing of greyhound handlers to cover the entire lifecycle</td>
<td>B. Develop standards framework for all greyhound handlers</td>
<td></td>
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<tr>
<td>Recommendation 3: Supporting the development and introduction of minimum standards</td>
<td>C. Consultation with experts</td>
<td>D. Undertake education campaign</td>
<td></td>
</tr>
<tr>
<td>Recommendation 4: Introduce a state-wide breeding quota</td>
<td>E. Obtain legal advice</td>
<td>F. Study of quota value, phase-in period, &amp; allocation approach</td>
<td></td>
</tr>
<tr>
<td>Recommendation 5: Expand greyhound re-homing in NSW</td>
<td>G. National advocacy</td>
<td>H. Study of greyhound re-homing and financing</td>
<td></td>
</tr>
<tr>
<td>Recommendation 6: Undertake further specification and analysis of the Centre of Excellence concept</td>
<td>I. Committee of club GMs, to specify CoE features and facilities</td>
<td>J. Financial analysis of CoEs</td>
<td></td>
</tr>
<tr>
<td>Recommendation 7: Prepare a Metropolitan Racing Strategy</td>
<td></td>
<td>K. Prepare strategy</td>
<td></td>
</tr>
<tr>
<td>Recommendation 8: Introduce new organisational structure</td>
<td>L. Draft amendments to Act</td>
<td></td>
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<tr>
<td>Recommendation 9: Implement a new GRNSW board structure</td>
<td>M. Develop skills matrix to be used for board appointments</td>
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<tr>
<td>Recommendation 10: Enhancements to transparency and accountability of GRNSW</td>
<td>Implemented by Action A</td>
<td></td>
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<tr>
<td>Recommendation 11: Appoint a greyhound racing Integrity Commissioner</td>
<td>Implemented by Action L</td>
<td></td>
<td></td>
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<tr>
<td>Recommendation 12: Establish a new Advisory Committee to replace the GRICG</td>
<td>N. Revise Clubs Registration Policy</td>
<td></td>
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<tr>
<td>Recommendation 13: Reform minimum club board membership requirements</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Recommendation 14: Enhance club governance and reporting model</td>
<td>Implemented by Action A and L</td>
<td></td>
<td></td>
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<tr>
<td>Recommendation 15: Amend the aims of the grading policy</td>
<td>O. Finalise Grading Policy Review</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Recommendation 16: Targeted changes to Grading Policy</td>
<td>P. Establish committee to identify revised programming objectives, and policy, &amp; consider preferential box drawers &amp; 6 starter races</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Recommendation 17: Use programming to enhance animal welfare</td>
<td>Q. Analysis of revised prizemoney allocations and place distribution (informed by Action T)</td>
<td>R. Revise Club Funding Policy</td>
<td></td>
</tr>
<tr>
<td>Recommendation 18: Targeted changes to prize money allocation</td>
<td>S. Committee to identify options for reducing track-related interference, optimum number &amp; mix of races</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Recommendation 19: Undertake analysis to identify how best to improve race quality</td>
<td>T. Strategic financial modelling of future GRNSW revenues and expenditure</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Recommendation 20: Develop a financial model to examine strategic issues</td>
<td></td>
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</table>
2.3 Governing implementation

Until the re-establishment of the GRNSW board, implementation of the reform initiatives recommended by the JWG should be overseen by a committee comprising the interim CEO of GRNSW, the Executive General Manager, Operations of GRNSW (the Chairperson of the JWG), two other members of the JWG, and a representative of the NSW Office of Liquor, Gaming and Racing (OLGR). The inclusion of a representative of OLGR is considered appropriate due to a number of the proposed actions involving legislative amendment. This total number of five members is considered an appropriate size. The committee would be supported by the GRNSW Manager, Industry Reform, and other GRNSW staff as appropriate.

The objective of this reform committee should be to ensure GRNSW is implementing reform actions in accordance with the timelines identified above, and to provide expert advice on implementation issues as they arise. The committee should also provide feedback on the findings of additional analysis undertaken by GRNSW in response to the JWG recommendations, particularly as this analysis informs the implementation of JWG recommendations.
3 Reduce ‘wastage’ by placing animal welfare at the centre

3.1 Reform is required to meet community expectations

Since the ‘live-baiting’ scandal came to light in February 2015, there has been a heightened awareness of several facets of the welfare and treatment of greyhounds. In addition to ‘live-baiting’, this includes race and training related injury, and most prominently, over-production and unnecessary euthanasia. When appearing before the Special Commission, the interim Chief Executive of GRNSW stated:

...engaging with the over-production and the unnecessary euthanasia of the greyhounds is the substantive issue that we must resolve.2

The [Special] Commission has identified that a significant issue concerning the welfare of greyhounds and the ongoing sustainability of the greyhound racing industry in New South Wales is the killing of many healthy greyhounds which have been purpose bred to race.3

Such is the importance of over-production (or over-breeding) and unnecessary euthanasia (also referred to as ‘wastage’), that the Special Commission has recently called for, and closed, submissions on this issue. It is widely agreed that the industry must successfully address this issue if it is to meet community expectations as being an ethical and humane industry.

The starting point for the work of the JWG has been the Terms of Reference which requests recommendations to the interim Chief Executive of GRNSW on:

...practical steps, actions and/or initiatives which can actively be taken to abolish (or otherwise lessen substantially) the overproduction, and unnecessary euthanasia of greyhounds in the New South Wales industry.

The JWG has considered this issue from the perspective of the greyhound lifecycle, including the role of regulation of breeding, the transfer of greyhounds, and providing incentives aimed at reducing unnecessary euthanasia. Separately, the JWG has sought to supplement (and not duplicate) the work of the Special Commission and work commissioned by Greyhounds Australasia in Section 3.3.1.

The JWG emphasised that the success of the reforms will depend on broad culture change within the industry.

3.2 ‘Wastage’ of greyhounds is at the centre of animal welfare concerns

At the centre of discussions on animal welfare is the ‘wastage’ of greyhounds. ‘Wastage’ means the number of healthy greyhounds bred for the purpose of greyhound racing are subsequently destroyed either prior to being named, prior to being raced, on retirement from racing. In general terms, ‘wastage’ is a consequence of:

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2 Paul Newson, Special Commission of Inquiry into the Greyhound Racing Industry in New South Wales: Transcript of Proceedings, P-408.
3 Special Commission of Inquiry into the Greyhound Racing Industry in New South Wales, Issues Paper on Overbreeding and Wastage.
the over-production of greyhounds, whereby more greyhounds are bred than are required to provide for a sustainable greyhound racing industry

- the unnecessary euthanasia of greyhounds, which is partly a result of over-production, the lack of racing options for less-competitive and older greyhounds, and insufficient options for younger greyhounds either not suitable for racing, or for retired racing greyhounds.

GRNSW currently does not have reliable information in regard to overall wastage rates, however, recognises that timely, complete and accurate data on this issue is a fundamental requirement, with deliberate action being taken to address this deficiency.

Indicative data available to GRNSW shows:

- approximately 40 per cent of greyhounds do not make it to the track
- the industry sponsored Greyhounds As Pets (GAP) program rehomes around 6 per cent of all pre-raced and retired greyhounds, including some interstate bred and raced greyhounds. The industry also supports the Greyhound Adoption program.

The JWG notes that there is also substantial private adoption activity which is not reflected in this data.

Even though the specific details of the problem cannot be quantified, the industry recognises it must take decisive action to abolish or at least substantially reduce unnecessary euthanasia.

### 3.3 Over-production and unnecessary euthanasia is being given widespread consideration

The JWG is cognisant that there are several other NSW and national processes underway considering issues related to over-production and unnecessary euthanasia.

#### 3.3.1 The Special Commission of Inquiry is focussing on over-production and unnecessary euthanasia

The Special Commission has recently completed a public consultation on over-breeding and wastage. An issues paper was released by the Special Commission, with the industry and the wider community having the opportunity to make submissions to the Special Commission on the identified issues.

The JWG also acknowledges a report commissioned by GRNSW, and details provided by Working Dog Alliance (WDA) in relation to improving the socialisation and welfare of greyhounds from initial whelping until retirement.4

#### 3.3.2 Greyhounds Australasia is leading national action on this issue

The JWG acknowledges that Greyhounds Australasia (GA) has recently engaged a consultant on behalf of member jurisdictions to undertake analysis and modelling on the future breeding requirements for the greyhound industry to be able to continue to supply appropriate numbers for racing.

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The development of NSW reforms will also need to reflect the National Greyhound Welfare Strategy. This strategy was launched in May 2014, and aims to ensure uniform high standards of care, participant education, accountability and controlling body enforcement are in place to achieve the best possible outcome for all greyhounds.

Strategy initiatives include:

- moving towards all greyhounds having to be under the care of a registered participant at all times during their lifecycle, unless retired as a pet
- introducing a national approach to breeding to further reduce the number of greyhounds being bred, and to ensure the decision to breed a litter of greyhounds is a considered one
- maximising opportunities for all greyhounds to reach their full potential
- maximising racing opportunities for all greyhounds
- continuing to improve end of career options for all greyhounds
- introducing a new national approach to participant education, registration and licensing and strong enforcement of facility inspection and compliance programs.

Several elements of the National Greyhound Welfare Strategy have underpinned the development of options and recommendations by the JWG.

3.4 The JWG has identified several causes of the wastage problem

Of paramount concern to the JWG is the high percentage and number of greyhounds that do not make it to the track, particularly as this often results in euthanasia. The information available to the JWG indicates that this issue has several distinct causes:

- lack of a lifecycle focus – weak regulation and monitoring of greyhounds, and the people responsible for their care, across the lifecycle
- over-production – with too many greyhounds being bred
- inadequate training and development – too many greyhounds do not receive the training and development they require to race competitively
- insufficient racing opportunities – there are insufficient opportunities for less-competitive greyhounds to race.

There is a strong inter-dependence between each of these elements. For example, the over-production of greyhounds reduces the capacity of owners to undertake training and development, and means there are more greyhounds than can realistically be raced.

Actions are required to improve the monitoring and regulation of greyhounds across the entire lifecycle. There is a need to reduce the numbers of greyhounds bred each year to a level that provides adequate numbers for racing, while reducing unnecessary euthanasia. Effort is also needed to increase the adoption of greyhounds following their retirement from racing.

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3.4.1 There is a need to enhance management across the greyhound lifecycle

The JWG has taken a lifecycle perspective to considering animal welfare (see Figure 7). This perspective has led the JWG to seek to understand the regulation, monitoring and related activities undertaken by GRNSW across each stage of the greyhound lifecycle with respect to both greyhounds and their human participants. This work is summarised in Table 1 (greyhounds, p. 29) and Table 2 (participants, p. 35). These tables detail current practice, changes already being progressed to the implementation stage by GRNSW, and proposed changes identified by the JWG to address identified shortcomings.

Figure 7: Greyhound lifecycle: summary of existing and proposed regulation and monitoring

<table>
<thead>
<tr>
<th>Greyhounds</th>
<th>Participants</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Current</strong></td>
<td><strong>Proposed (or underway)</strong></td>
</tr>
<tr>
<td><strong>Owners</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>Breeding</td>
<td></td>
</tr>
<tr>
<td>Registration: Breeding identification card (Pink card)</td>
<td>Annual cap on number of litters</td>
</tr>
<tr>
<td>Breeding approval required in certain circumstances</td>
<td>Pink card for female sires rated for suitability</td>
</tr>
<tr>
<td>Whelping</td>
<td></td>
</tr>
<tr>
<td>No registration required</td>
<td>Registration immediately following whelping</td>
</tr>
<tr>
<td>Rearing</td>
<td></td>
</tr>
<tr>
<td>Litter registration</td>
<td>1st socialisation test by integrity officers</td>
</tr>
<tr>
<td></td>
<td>2nd socialisation clearance test later in rearing period</td>
</tr>
<tr>
<td>Education</td>
<td></td>
</tr>
<tr>
<td>No regulation or monitoring</td>
<td>Lifecycle monitoring 3rd socialisation clearance test</td>
</tr>
<tr>
<td>Oversight only from trialling activity</td>
<td></td>
</tr>
<tr>
<td>Training</td>
<td></td>
</tr>
<tr>
<td>Lifecycle monitoring</td>
<td></td>
</tr>
<tr>
<td>Racing</td>
<td></td>
</tr>
<tr>
<td>Registration</td>
<td>No regulatory changes proposed</td>
</tr>
<tr>
<td>Retirement</td>
<td></td>
</tr>
<tr>
<td>Notification of retirement form</td>
<td>No regulatory changes proposed</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>Re-homing &amp; adoption</td>
<td></td>
</tr>
<tr>
<td>No monitoring</td>
<td>No regulatory changes proposed</td>
</tr>
<tr>
<td>Increasing adoption capacity</td>
<td></td>
</tr>
<tr>
<td>End of life</td>
<td></td>
</tr>
<tr>
<td>As per retirement</td>
<td>No regulatory changes proposed.</td>
</tr>
<tr>
<td>Mandatory reporting in certain circumstances</td>
<td>Increased enforcement activity</td>
</tr>
</tbody>
</table>

Source: Nous Group

Enhancing the monitoring of greyhounds across the lifecycle

The JWG considers that GRNSW should have systems and processes in place to be able to locate each greyhound and be clear who is responsible for the progress of the greyhound and its welfare throughout the entire lifecycle, from breeding through to retirement and end of life. The report refers to this as
lifecycle monitoring. The only exception would be that the GRNSW role ends if a greyhound is adopted, and is subject to the Companion Animals Act 1998.

The JWG notes that there is already extensive regulation and monitoring by GRNSW of greyhounds at key stages in their lifecycle, such as when greyhounds are breeding and racing (see Table 1, p. 29). However, there are notable gaps, most significantly following the commencement of rearing (at 12-14 weeks) to when a greyhound is registered for racing (around 14-16 months). These gaps need to be addressed through the application of appropriate monitoring and owner/participant reporting at these times. This monitoring should include the expansion of socialisation tests undertaken by integrity and compliance officers as part of their routine activities. Addressing these issues is in line with the requirements of the national licensing program, which is to come into effect from 1 July 2016; with each licensee to be accountable for the greyhounds on their property.

Actions related to breeding are discussed in Section 3.4.2, and re-homing and adoption in Section 3.4.4. The JWG also notes that there are currently enforcement gaps with respect to greyhound deaths. It is understood that all deaths are required to be reported to GRNSW (except when a greyhound has already been adopted). However, there is poor compliance with this requirement, which GRNSW is currently seeking to address.

Accompanying the enhanced monitoring and regulation of greyhounds that is already being progressed by GRNSW, and the proposals identified by the JWG, is a need for enhanced reporting of performance across the lifecycle. This enhanced reporting should include, at a minimum:

- number of greyhounds by age
- number of socialisation clearance tests undertaken by lifecycle stage, including details of outcome
- number of pups that die prior to reaching rearing age
- estimated life expectancy of greyhounds at whelping
- number of deaths, by age and gender
- average annual starts per active greyhound racing, with this data potentially also reported as a distribution
- success rates of sires
- injury rates of sires and dams
- average career lifespan of ‘retired’ greyhounds
- average age of ‘retired’ greyhounds.

The above list is indicative, with further development of relevant performance measures required. This data should all be reported publicly, either in the GRNSW Annual Report, or a supporting publication. If required, modifications should be made to the OzChase system to enable collection and subsequent reporting of this performance data. Finally, aspects of these proposed measures, such as estimated greyhound life expectancy, may require the assistance of a veterinary epidemiologist.
Table 1: Regulation and monitoring across the lifecycle: greyhounds

<table>
<thead>
<tr>
<th>Current regulation and programs</th>
<th>Pending introduction</th>
<th>JWG proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Breeding</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Registered</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Breeding Identification Card (Pink card) issued prior to breeding. Only criteria is current C5 vaccination and a DNA fingerprint analysis. Separate approval to breed is required if breeding female is:  
  - eight years or older and/or  
  - has bred three litters.  
  Not permitted to have 2 litters in an 18 month period. Approval of breeding application is dependent on fulfilling criteria related to progeny of breeding female comprising naming rates, racing rates and winning rates. Breeders may apply for an exemption. | | Impose a cap on the number of litters to be bred. Total litter cap would be underpinned by estimates of future race needs (see Section 3.4.2). Issue of Pink card to be conditional on the ‘quality’ of the wins of progeny of breeding female, including race types of wins and prizemoney. Sires to be rated for suitability to breed based on own traits and by measuring their breeding value based on progeny success rates. Undertake research to identify associations with reduced wastage metrics to inform breeding, rearing and training methods that relate to positive outcomes for career longevity. |
<p>| <strong>Whelping (from 0 to 12-14 weeks)</strong> | | |
| <strong>No registration requirement</strong> | Registration should take place immediately following whelping. | |
| <strong>Rearing (from 12-14 weeks, to 14-18 months)</strong> | Socialisation test by integrity officers at ‘littering’ to check milestones are being met (e.g. confidence with humans, handling and novel objects, reactivity/chase interest to moving object, sound stimulus). | Second socialisation clearance test later in rearing period to check for further milestone achievement (e.g. lead walking, confidence at race track, entering kennel). |</p>
<table>
<thead>
<tr>
<th>Current regulation and programs</th>
<th>Pending introduction</th>
<th>JWG proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Education (between 14 to 18 months)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>No regulation or monitoring</strong></td>
<td>Naming may occur from 12 months.</td>
<td><strong>Include in lifecycle monitoring</strong> Third socialisation clearance test in education period to check for further milestone achievement.</td>
</tr>
<tr>
<td><strong>Training (from 14 months)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>No regulation or monitoring.</strong></td>
<td>Monitoring only via trialling activity.</td>
<td><strong>Include in lifecycle monitoring</strong></td>
</tr>
<tr>
<td><strong>Racing (from 16 months to around 4 years)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Registration for racing</strong></td>
<td>As part of registration, greyhounds are typically named at this time. Monitored through racing activity. If greyhound not recorded as racing in a 6 month period, GRNSW contacts owner to determine status.</td>
<td>No changes proposed</td>
</tr>
<tr>
<td><strong>Retirement</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Notification of retirement form</strong></td>
<td>Retirement is required for male or female greyhound to commence breeding, to be adopted, or kept as a pet.</td>
<td></td>
</tr>
<tr>
<td><strong>Re-homing and adoption</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>No monitoring</strong></td>
<td>GRNSW is working with interested agencies to support rehoming. Increased capacity at GAP facility through major renovation, increase in staff. Regional intake points for increased accessibility for trainers.</td>
<td></td>
</tr>
<tr>
<td>Current regulation and programs</td>
<td>Pending introduction</td>
<td>JWG proposal</td>
</tr>
<tr>
<td>--------------------------------</td>
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</tr>
<tr>
<td><strong>End of life</strong></td>
<td></td>
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</tbody>
</table>

Identical reporting requirement to retirement. Mandatory reporting if:
- death is prior to retirement from racing
- greyhound has retired from racing and is now breeding
- greyhound is not adopted out after retirement.

There is currently poor compliance with this reporting requirement.
There is no reporting requirement if a greyhound has retired prior to death.

GRNSW is increasing enforcement of mandatory reporting requirements.

*Source: Advice from GRNSW.*
Progress is being made in the regulation of participants and owners

The JWG considers that there is a need to greatly enhance the licensing requirements, and their associated standards, for the participants involved at the different stages of the greyhound lifecycle. This is an area already identified in the National Greyhound Welfare Strategy, which has an objective of “greyhounds having to be under the care of a Registered Participant at all times during their lifecycle, unless retired as a pet.” Separately, the JWG considers that the responsibilities of owners across the lifecycle should be enhanced – ultimately owners should be held accountable for the welfare of their greyhounds.

As detailed in Table 2 (p. 35), participants and owners are required to be licensed or registered at several points in the lifecycle including breeding, whelping and training. However, there is currently no registration or licensing for those responsible for breaking-in and education. These gaps are to be addressed as part of the GRNSW implementation of the National Greyhound Welfare Strategy.

In those areas where there is already licensing (or registration), the JWG considers there is a need to improve minimum standards. In particular, participants involved with greyhounds at each stage of the lifecycle should possess appropriate educational qualifications. This may require the establishment of new courses, and the identification of approved training providers. The JWG supports a consistent approach being adopted throughout the lifecycle and the preferred model is for all participants to be required to have a licence. Licensing should also be conditional on industry participant’s facilities meeting a minimum standard.

The JWG also considers that participants must meet performance standards to maintain licensing at the various lifecycle stages. For example, the ongoing licensing of a rearer should be based on the success of their greyhounds, measured by the percentage of greyhounds that commence racing and greyhound performance on a socialisation clearance test. Separately, the ongoing licensing of owners should be reviewed periodically (possibly every five years), with factors such as irregular rehoming practices (e.g. low rehoming ratio and high rate of greyhounds passing away from injury) informing the licence renewal decision.

Recommendation 1

The JWG recommends that GRNSW expand greyhound registration and monitoring to cover the entire lifecycle. This is to encompass:

- registration and monitoring of greyhounds, and periodic assessment of greyhounds at key lifecycle stages by integrity and compliance officers
- identification of animal welfare and development performance measures related to key stages of the lifecycle
- collection, analysis and public reporting of performance measures in either the GRNSW Annual Report, or a separate publication.

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Licence fees for industry participants at the various stages of the lifecycle should also be based on the costs of GRNSW monitoring and intervention. For example, individuals responsible for a greater number of greyhounds are expected to generate a higher monitoring cost for GRNSW. These differential costs should be reflected in licensing fees. Likewise there should be separate licence tiers for hobbyists and professionals – reflecting the different standards and requirements.

To minimise the regulatory burden of the new licensing regime, the JWG suggests there should be one licence application process, with participants required to apply for licensing of selected lifecycle stages at the same time. This will remove the need for multiple applications, licences and renewals for individual participants.

Public reporting should accompany the above changes proposed by the JWG to the regulation and licensing of participants and owners. At the present time, only data on the number of trainers, owner/trainers and attendants is documented in the Annual Report. This should be expanded to include the additional coverage proposed by the JWG (e.g. breeders and rearers). Related data should also be collected and reported. This could include:

- number of applicants for a licence at each lifecycle stage, and the number who are licensed. Data on the numbers not approved, and reasons for rejection, should also be reported
- numbers of owners or greyhound industry participants who have not had their licence renewed, including reasons for non-renewal
- number of facility inspections undertaken by integrity and compliance officers, and findings
- number of licensed greyhound industry participants who commence, successfully complete, or do not complete. The requisite educational qualification, as well as the number who obtain recognition of prior learning.

The JWG considers the above list as a starting point only, with further development of specific performance measures required.

Changes to the licensing regime will need to be accompanied by a communications campaign focussed on raising awareness among participants of the rationale for the reforms, and the implications of the new requirements at the different stages of the lifecycle. It will also need to be accompanied by an education campaign that specifies what each participant is required to do under the new regime.
Recommendation 2

The JWG recommends that GRNSW expand the licensing of greyhound handlers to cover the entire lifecycle, including:

- the introduction of minimum standards, together with the completion of an educational qualification (with exemptions available for recognition of prior learning)
- introduction of a single licensing process for greyhound handlers, with handlers approved only for those components of the lifecycle for which they have applied and been approved
- having licensing tiers – for hobbyists and professionals – with their differential requirements reflecting the different standards required
- periodic licence renewal being subject to appropriate greyhound outcomes.

Recommendation 3

The JWG recommends that the development and introduction of the minimum standards required as part of recommendation 1 be:

- informed by further consultation by GRNSW, including with experts from across the lifecycle
- accompanied by an education campaign for greyhound handlers focussed on improving awareness of the reforms and their rationale, particularly during the phase-in period
- accompanied by the development of appropriate educational materials and training programs, providing participants with the requisite knowledge and skills to meet the new standards
- expansion of public reporting related to the regulation and licensing of greyhound handlers.
Table 2: Regulation and monitoring across the lifecycle: participants and owners

<table>
<thead>
<tr>
<th>Current regulation and programs</th>
<th>Pending introduction</th>
<th>JWG proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Owner</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Registered (lifetime)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Only have a limited capacity to be involved with greyhound. Unable to handle greyhounds in any capacity, unless the person holds another appropriate license. Owner is responsible for the lifecycle of the greyhound.</td>
<td>Rule 106 was recently amended to specifically make the owner responsible for reporting retirement outcomes.</td>
<td>As part of the licensing framework introduce a licensing system for owners (which may be similar to the current registration system but will provide for consistency across the whole system). Introduce periodic owner licence renewals (possibly every five years). Conduct audits of owners’ greyhounds to identify irregular rehoming practices (e.g. low rehoming ratio and high rate of greyhounds passing away from injury). Increase responsibilities of owner across the lifecycle.</td>
</tr>
<tr>
<td><strong>Breeding</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Licensed</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Required to complete the Breeders Education Pack, including a questionnaire test, compliance visit and police record check.</td>
<td></td>
<td>In line with National Greyhound Welfare Strategy, enhanced licensing requirement for breeders to complete a qualification skill set in addition to the existing compliance checks. Recognition of prior learning will be available but will involve formal assessment. Breeders to be required to comply with the licence conditions which could include adherence to specific standards or a code of practice. Potentially cap the number of litters (see Section 3.4.2). Number of litters to be subject to license tier, along with tiered licence fee based on monitoring costs (tied to risk).</td>
</tr>
<tr>
<td><strong>Whelping (from 0 to 12-14 weeks)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>As per breeding.</td>
<td>As per breeding.</td>
<td>As per breeding.</td>
</tr>
</tbody>
</table>
### Current regulations and programs

<table>
<thead>
<tr>
<th>Rearing (from 12-14 weeks, to 14-18 months)</th>
<th>Pending introduction</th>
<th>JWG proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>No licence or registration</strong>&lt;br&gt;No licence. The rearer is identified as part of greyhound registration.</td>
<td>Licensing, as per the National Greyhound Welfare Strategy.</td>
<td>Implement rearing standards, including requirement to complete educational competency, and facility standards. Success (wastage and racing metrics) to be monitored to rate/accredit/promote good rearers and intervene/suspend/penalise poor performers. Assessment of success to be informed by socialisation clearance test.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Education (between 14 to 18 months)</th>
<th>Pending introduction</th>
<th>JWG proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>No licence or registration.</td>
<td>Licensing, as per the National Greyhound Welfare Strategy. Facets of standards policy are being drafted.</td>
<td>As per rearing. Also include metrics associated with greyhounds successfully transitioning to racing.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Training (from 14 months)</th>
<th>Pending introduction</th>
<th>JWG proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Trainers - Licensed</strong>&lt;br&gt;Adherence to Code of Practice, including minimum standards of accommodation and management. Three tiers – Attendant, Owner-Trainer and Public Trainer. Owner-Trainers may apply to upgrade to a full Trainer licence only after holding an Owner-Trainer licence for 12 months or longer. Receiving a full Trainer licence requires proving capability and ability, based on results.</td>
<td>Education sessions to participants through workshops which have incorporated animal welfare, chasing and husbandry techniques. National proposals under consideration  Three tiered licensing based on previous performance (wastage metrics), T3 (entry level) trainers limited to 3 greyhounds in training, T2 up to 10 in training, T1 unlimited. Licence fee would also be tiered, based on monitoring costs.</td>
<td>Licensing requiring mandatory education. Recognition of prior learning available through assessment.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Racing (from 16 months to around 4 years)</th>
<th>Pending introduction</th>
<th>JWG proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Trainers - As per training.</strong>&lt;br&gt;Attendants – licence to allow individual to handle, box, catch and generally assist a trainer at a track on race days.</td>
<td>As per training.</td>
<td>As per training.</td>
</tr>
<tr>
<td>Current regulation and programs</td>
<td>Pending introduction</td>
<td>JWG proposal</td>
</tr>
<tr>
<td>--------------------------------</td>
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<td>--------------</td>
</tr>
<tr>
<td><strong>Re-homing and adoption</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Owners responsible for re-homing and adoption, after retirement from racing.</td>
<td></td>
<td>Enhance actions to support re-homing and adoption, additional to regulation and monitoring (see Section 3.4.4).</td>
</tr>
</tbody>
</table>

*Source: Advice from GRNSW.*
3.4.2 Introduce annual breeding volume limits and a quota system

As detailed in Figure 8, the number of greyhounds whelped in NSW has decreased from 8,125 to 7,964 over the period 2011-12 to 2014-15. However, the reduction in 2015 has been much greater – in the 10 months to October 2015, breeding decreased by 17 per cent, compared to the same period in 2014. This reduction is understood to be a consequence of recent regulatory changes introducing a Breeding Identification Card (Pink Card), as well as breeders responding to the ‘live baiting’ scandal. The data presented in Figure 8 indicates that around 65 per cent of greyhounds end up racing, meaning that of those greyhounds born each year, over 2,000 greyhounds will not race under current settings.

The JWG considers that one lever for reducing the number of greyhounds that do not race is to reduce breeding numbers.

In broad terms, reducing the quantum of breeding first requires the identification of an appropriate annual breeding target – GRNSW has undertaken preliminary estimates identifying around 7,500 pups per year are required to meeting current scheduling requirements. These figures are heavily dependent on assumptions around the percentage of greyhounds that race, how many races they undertake over their career, their career lifespan, and the number of races. Changing key assumptions, such as average career length, changes the estimated breeding requirement. This is an area requiring additional analysis, with a current Greyhounds Australasia research project expected to provide guidance. Indeed, the JWG is concerned that the introduction of a NSW-only target will be problematic in the absence of a national breeding target, such that GRNSW should advocate for a national target with Greyhounds Australasia.
and its member organisations. The need for a national target is due to the significant interstate movement (and, to a lesser extent, international movement) of greyhounds for racing and breeding.

In the meantime, the JWG considers that GRNSW should move forward to establish a state-wide target, which is determined six-monthly. It was not considered practical to implement regional targets. GRNSW should move to identify indicative breeding targets immediately, requiring the development of a robust model to monitor progress and revise breeding targets.

After identifying an appropriate breeding target, which is actually a litter target, there is then a need to implement an appropriate regime. As detailed in Figure 9, there are new controls currently applied by GRNSW to contain breeding. There is currently an uncapped number of breeders, with no targets or quotas used to allocate litter numbers to breeders. The JWG has identified a number of options that can be applied at the different stages of the breeding cycle – breeder licensing, the identification of litter numbers, and the allocation of litters to breeders. As identified in Figure 9 there are a number of dependencies associated with each approach.

![Figure 9: Options for implementing breeding volume limits](image-url)

The options at each stage comprise (JWG preferred option in **bold italics**):
- breeder licensing – *uncapped number*, or a fixed number
- litter number – no target or quota, flexible breeding target, or a *fixed breeding quota*
- litter allocation to breeders – market-based, *centrally determined allocation*, or *auction*.
The litter allocation approaches resulting in either a centrally determined allocation or auction will lead to a fixed number of litters. In contrast, a market-based litter allocation approach will result in an uncapped number. Given the issues facing NSW greyhound racing, the JWG favours the introduction of a fixed breeding quota in conjunction with an uncapped number of breeders. The operation of this new system should be reviewed within two years of commencement.

The JWG notes that the application of a fixed breeding quota may, in the absence of enabling legislation, contravene the Competition and Consumer Act 2010 (Commonwealth). Legislative change of the Greyhound Racing Act (2009) should be focussed on providing GRNSW with the powers to introduce a quota.

Irrespective of this, the JWG note that it would be important for any breeding control to occur on a national basis.

There was not consensus among the JWG on the most appropriate approach to allocating the fixed breeding quota among breeders. However, the JWG did agree that there should be separate allocations and procedures for ‘hobby breeders’ and for ‘professional breeders’. Specific definitions for these breeding types were not identified by the JWG, and will be required to be developed by GRNSW. The JWG felt that differential treatment of hobby and professional breeders could extend to hobby breeders being able to appeal for a quota exemption in extenuating circumstances.

The first option – a centrally determined allocation – would involve potential breeders applying for an allocation. This would be accompanied by a fee tied to the size of the resulting allocation, and whether they were a ‘hobby breeder’ or a ‘professional breeder’. Under this option, the JWG considered that the quota would be allocated based on objective criteria, such as past breeding history, and the success of resulting greyhounds. However, a specific set of metrics was not identified by the JWG.

The second option for allocating the state-wide breeding quota is an auction process. There would be a price floor, and also a cap on how many breeding permits a single breeder can purchase in a year. An auction approach would ensure that the breeding quota is allocated to breeders who place the highest value on it.

The JWG also considered how the auction sale proceeds could be applied. One option was that a proportion of the sale be paid back to greyhound owners at key milestones in their lifecycle, such as first trial, first race, re-homing and so on. This payment would be forfeited if a greyhound does not meet the relevant milestone.

Another issue considered by the JWG was whether breeders were required to use their quota within a set period of it being issued (say 12 months). Options considered by the JWG included that a breeder unable to use all their quota in a single year would be able to roll it over to the following year, or sell it back to GRNSW at the original sale price (minus an administration fee). Alternatively, breeders could be able to sell their quota to another breeder via a secondary market. The JWG also noted that if the quota is implemented under the first option – a centrally determined allocation – it may be appropriate for some of the total breeding allocation to be kept in reserve for exceptional circumstances.

Finally, a hybrid option for allocating the quota amongst breeders was also identified. This would involve a set percentage of the quota (for example, 75 per cent) being allocated on the basis of historical breeding activity (amongst those who apply). The remaining 25 per cent of the quota would be allocated annually via an auction. Those part of the historical allocation could sell (or even lease) their quota to other breeders. These various options highlight how there are numerous possibilities in the very specific design of the allocation mechanism. If GRNSW decides to apply the auction approach, specialist advice will be required to identify the most appropriate design.
Irrespective of the specific quota system introduced by GRNSW, the JWG considers that engagement will be required with industry participants to ensure widespread understanding of the features of the quota system.

**Recommendation 4**

The JWG recommends:

- GRNSW obtains legal advice on the most appropriate process to introduce a quota, including whether a breeding quota is legally enforceable under existing New South Wales and Commonwealth Government legislation, and specific legislative amendments that may be required.

- drawing either from the impending findings of the current Greyhounds Australasia project, or separate analysis, GRNSW should immediately undertake estimation of a state-wide breeding quota. This analysis should also identify an appropriate phase-in period.

- the quota be reviewed every six months, and that the quota system be reviewed two years after commencement to assure its effectiveness.

- GRNSW undertakes further analysis to identify the merits and practicalities of implementing the state-wide breeding quota through either a centrally determined allocation to breeders, or an auction process. Under both approaches there should be separate allocations and procedures for ‘hobby’ and ‘professional’ breeders.

- that GRNSW advocate for the introduction of a national breeding target with Greyhounds Australasia and its member organisations.

**3.4.3 There is a need to increase racing opportunities for greyhounds**

The JWG strongly agreed that increasing the number of opportunities for racing by greyhounds is necessary. There are currently some opportunities open to older greyhounds through masters racing, however, the JWG considers that further opportunities are required. For example, increased opportunities are required not just for older greyhounds, but also weaker and less-competitive greyhounds. This issue is canvassed further in Section 6 as part of proposed changes to grading systems and programming.

The JWG also believe there should be greater application of more inventive efforts locally and interstate to cross fertilise ideas. To enhance the racing opportunities for greyhounds, the JWG see a need for a superior marketing of the greyhound brand.

The JWG notes that meeting this objective will be challenging, due to the current over-supply of greyhounds for current racing requirements. Increasing the number of races undertaken by individual greyhounds will need to be considered in the context of the total number of races and tracks, funds available for prizemoney, and future breeding levels. The number of races each greyhound is expected to participate in over their racing career, will also need to be factored into the considerations for the number of races held and the number of greyhounds bred.
3.4.4 Additional resources should be dedicated to increasing the number of greyhounds adopted through industry re-homing efforts

Currently the number of greyhounds re-homed is a small percentage of the total number of retired greyhounds. Numbers as low as 6 per cent have been cited for re-homing in Australia. The JWG considers that adoptions should be increased, where possible, to reduce euthanasia.

As discussed above in Section 3.4.1, the JWG considers that owners should be held responsible for the re-homing of their greyhounds.

Evidence presented to the JWG indicates that in the United States of America, greyhound re-homing is extensive and successful. The JWG considers that the models applied in the United States, such as greyhounds being adopted by aged care facilities and community groups, should be investigated further for this applicability for the NSW context. The JWG also believes NSW reforms should be informed by the approaches taken in all major international systems.

Advice was provided to the JWG on the services and infrastructure required to support greyhound re-homing. This included appropriate kennel and training facilities, with a strong focus on socialisation. Increased socialisation efforts in the phases of the lifecycle, particularly rearing and education, should reduce the level of post-racing training required in the future. The JWG considered that these services should be part of Centres of Excellence (see Section 4). The JWG noted the need to improve access to re-homing in regional locations, which can be addressed by the introduction of Centres of Excellence.

The JWG considers that a national approach is required to greyhound adoption. This is due to inconsistent rules regarding greyhound adoption across Australia. The JWG considers that a national approach would ensure that greyhounds raced for a certain period in a jurisdiction would then be able to access the relevant greyhound adoption program in that state.

There is also a need to raise public awareness of greyhounds as suitable pets. This effort should be focused on improving perceptions of greyhounds, and awareness of where individuals and families can obtain a greyhound. The JWG notes that the increased focus on the adverse welfare outcomes for dogs bred at ‘puppy farms’ in NSW may reduce the supply of dogs as domestic pets, and create an opportunity for the increased adoption of greyhounds.

A number of options were identified by the JWG for generating the resources required to finance the re-homing phase. The JWG favoured placing a levy on all prize monies paid, unless an owner has already paid a bond guaranteeing re-homing. This bond would be refundable following successful re-homing. Alternatively, a levy could be included in licence or registration fees. The various options and how they could be implemented require further exploration.
Recommendation 5

The JWG recommends:

- GRNSW investigates the success of greyhound re-homing activities undertaken in the United States and other international jurisdictions as well as across Australia, to identify best practices that could be effectively applied in NSW.

- Further investigation be undertaken by GRNSW on options for financing greyhound re-homing, including an optional levy for owners at the naming of greyhounds, application of a prizemoney levy, or an increased registration or licence fee for owners.

- Advocate with Greyhounds Australasia and its member organisations for the introduction of a nationally consistent approach to greyhound adoption.

- GRNSW increase its efforts at enhancing public perceptions of the greyhound breed for adoption, and take action to increase access to greyhound adoption in regional NSW.

- GRNSW support the expansion of greyhound re-homing through identification of suitable locations to provide access to the Greyhounds as Pet program, with a particular focus on regional NSW.
4 Centres of Excellence

4.1 A new Centres of Excellence model is required for the industry to be sustainable

Significant change is required to the current network of 34 tracks if the industry is to be financially sustainable into the future, while also placing a strong emphasis on animal welfare and governance. To this end, NSW greyhound racing tracks need to become Centres of Excellence. As this transition will require significant resources and cultural change, a range of actions will be required, including:

- optimising the number of racing tracks across NSW
- developing high quality racing and non-racing infrastructure and facilities across tracks
- integrating tracks and clubs with local stakeholders within the community.

Centres of Excellence with improved facilities and amenities will provide more diverse offerings to attract a greater audience, grow participation and directly enhance the economic and social contribution of greyhound racing to NSW.

4.1.1 There is an extensive track network across New South Wales

There are currently 34 registered greyhound racing tracks in NSW, 33 of which are funded by GRNSW (see Figure 14). One organisation, the NSW Greyhound Breeders, Owners & Trainers Association (GBOTA) operates 8 tracks, with the remaining 26 tracks operated by individual clubs. There are also a number of registered trial tracks across NSW.

Although there is a state-wide average of 36 meetings per track programmed in 2015-16, this number varies greatly between tracks. In 2015-16, three TAB tracks are programmed to have 100 or more meetings each, whereas one non-TAB track is programmed to have only two meetings (see Table 3).

The tenure of individual tracks sees only 14 tracks on freehold land owned by clubs. The majority of tracks are on leased or trust owned land. All 15 TAB tracks and 4 non-TAB tracks have a loam surface, with 15 non-TAB tracks having a grass surface.
Figure 10: Existing greyhound racing tracks across NSW

Source: Greyhound Racing NSW
## Table 3: Characteristics of the existing greyhound racing tracks in NSW

<table>
<thead>
<tr>
<th>Track</th>
<th>Region</th>
<th>Meets</th>
<th>TAB-status</th>
<th>Grade</th>
<th>Track characteristics</th>
<th>Tenure</th>
<th>Track layout</th>
<th>Veterinary services: consultancy</th>
<th>Hospitality (i.e. bar, and dining)</th>
<th>On-site gaming</th>
</tr>
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<tbody>
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</table>

Notes:\(^a\) Programmed meetings in 2015-16. \(^b\) Straight track is of training only.

Source: GRNSW
4.1.2 The standards and features of Centre of Excellence infrastructure and services will maximise welfare and amenity

The JWG has considered what should be the features of a Centre of Excellence, particularly infrastructure and services.

Large variation exists among racing tracks on the basis of safety standards, track type and length, surface type and quality, kennel infrastructure, lures and available public amenities.

In addition, the JWG has identified the need for improved facilities for all stages of the lifecycle, including training amenities, track services and better use of assets.

Animal welfare concerns have led to minimum safety standards becoming a critical consideration. The design and surface material of a greyhound racing track can have a direct impact on the number and types of injuries caused to greyhounds. This issue is the subject of a study recently commissioned by GRNSW, which will identify optimal race track design to maximise greyhound safety and welfare.\(^7\)

Taking all these factors into account, the JWG has identified a range of characteristics of Centres of Excellence, encompassing both racing facilities and track standards, and non-racing facilities and support services.

Racing facilities and track standards

Building on the operational standards of existing TAB tracks, Centre of Excellence tracks should have the following characteristics:

- best-practice track design, camber and set out, which minimises the risk of greyhound injury. It may be appropriate that tracks be selected to ensure a range of track layouts (i.e. one turn, two turn, straight track).
- application of best-practice maintenance standards, which may require the appointment of a full-time track curator with appropriate qualifications.
- best-practice kennel facilities, with specific standards to be identified. These facilities are to be both for race days, and also available for participants unable to kennel their greyhounds at their residence.
- facilities for trialling, with time set aside outside racing for this purpose.

Finally, the JWG considered that Centre of Excellence tracks should only host TAB racing. This would bring NSW into line with Victoria, where there is no non-TAB racing.

Non-racing facilities

Centres of Excellence should also feature a wide range of non-racing facilities, including:

- facilities to support the delivery of education programs to trainers, owners and other participant
- greyhound education facilities, including socialisation areas and training (e.g. Habitation lessons to teach kennelling), bull pen, hydrotherapy pool, breaking in opportunities, a slipping track, sprint lanes and drag lure coursing facilities.

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on-site veterinary clinic, which is open during business hours, with emergency options. This will include a veterinarian being present during racing, trialling, and for private consultations. The veterinarian would also play a role in the delivery of education programs, and support the Greyhounds As Pets program. The clinic may also be co-located with a greyhound (and pet) supplies facility.

- hospitality facilities, which can be used on race days, as well as for community events and functions. These facilities will provide an opportunity for raising community awareness of greyhound racing.

- change rooms and showers for trainers and other guests, and potentially overnight accommodation (if there is not commercial accommodation available nearby).

- participant portal access, where participants can pay fees, submit documentation, undertake online nominations, and other activities.

- facilities for Greyhounds As Pets, providing access to staff trained in behavioural assessment and providing surrender points for trainers. This facility may provide fostering or rehoming out of the facility (depending on regional adoption demand) or transport to major facility near Sydney to manage adoption. The facility may also provide a base for community engagement focussed on increasing awareness of greyhound adoption as an option in the community.

It is envisaged that up to two Centre of Excellence Hub tracks will be used for used for metropolitan racing. The development of these tracks should be informed by the preparation of a Metropolitan Racing Strategy. This strategy should specify a vision for future metropolitan racing in NSW, and provide clear guidance on future facility requirements.

4.1.3 Optimising the number of tracks is critical for a financially sustainable industry

The JWG is of the view that the required standard of infrastructure and facilities cannot be implemented or sustained across all 34 tracks. By implication, the JWG considers there is a need to optimise the track footprint to achieve a more efficient and effective administration of the sport.

To this end, the JWG considers that there are significant efficiencies, through economies of scale, for racing taking place at individual tracks twice or more per week, and trialling occurring at least once a week. A significant proportion of track operating costs are fixed, including such as the track managers, curator, as well as rates and depreciation. This volume of racing at individual tracks will reduce the number of tracks required for greyhound racing in NSW in the future. Identifying the specific number of tracks required across NSW will need to take into account the total volume of racing, the frequency of racing each week at tracks, as well as the requirement for specific track types (e.g. one-turn, two-turn and straight tracks).

A future track network will also need to take into account where participants reside and their travelling patterns. The JWG considers that a guiding principle for any change is that 80 per cent of participants have access to racing and trial facilities within a 2-hour drive.

Specific options identified by the JWG comprise:

- Centre of Excellence tracks only – these tracks will comprise a single facility, featuring all of the facilities and services necessary

- Racing Hub with trialling spokes – all racing conducted at the Hub, with other tracks (i.e. the spokes) in the local area used for trialling purposes only. These trialling tracks would be operated from the ‘Hub’
- Centre of Excellence Hub with racing spokes – racing would be focused at the Centre of Excellence Hub, with some racing occurring at one (or more) spoke venues. The spoke venue(s) would have a lower level of infrastructure than the Hub but would be required to meet a minimum standard for track design. The racing spoke venues would be operated from the Hub.

The JWG preferred the third option – Centre of Excellence Hub with racing spokes where required to ensure state-wide coverage.

The JWG recommends that the location of the Centre of Excellence Hubs and racing spokes, be developed through the following analysis:

- determine the minimum standard for Centre of Excellence Hubs and Racing spokes, and agree the appropriate facilities and amenity as a pre-requisite for the conduct of race meetings.
- review current participant location and flows so that 80 percent of participants have access to racing within a 2-hour drive. This characteristic will mean that a track can support at least two race meetings per week. The number of race meetings at a Centre of Excellence track will be determined by the total number of centre of excellence tracks.
- assess the current club/track network using these criteria to determine where racing can be continued now, and where racing could take place with appropriate investment.
- at the same time undertake detailed analysis using current data and information to assess how many tracks can be financially sustained. Limited funds will be available for land acquisition, and the development and operation of Centres of Excellence. It may be appropriate that the location of Centres of Excellence be limited to industry owned or controlled land.
- establish an implementation plan for transitioning from the current arrangements to the new arrangements – setting an agreed transition timeframe.

Other factors that should potentially be considered in the selection of Centre of Excellence locations include having long-term tenure over the location of a track (either ownership or a 99 year or longer lease), and scope for future development and expansion.

### 4.2 Providing Centres of Excellence across New South Wales

#### 4.2.1 Potential locations across the state

Based on the above principles, and data and other information made available, the JWG has undertaken preliminary analysis to identify the regional location of Centre of Excellence Hub tracks. These tracks would be located so that 80 per cent of trainers are within two hours of a track.

This analysis is documented in Figure 11, identifying that 81 per cent of trainers and meetings, and 77 per cent of greyhounds, are located in five regions:

- Greater Sydney
- Hunter/Central Coast
- Illawarra, South Coast and Tablelands
- Far North Coast
- Central West.
As a consequence, this analysis suggests that Centre of Excellence Hub tracks should be located in these five regions. However, the JWG considers that further geospatial analysis should be undertaken to validate this finding. The specific number of Centre of Excellence Hub tracks in each region will need to be informed by cost analysis of what can be financially sustained.

In conjunction with the Centre of Excellence Hubs, the specific location and number of spoke racing tracks needs to be determined. These tracks will need to meet agreed standards, and be able to support at least weekly racing as a baseline for financial viability.

The JWG envisages that a single club would be responsible for both a Hub and corresponding spoke track (where relevant), with the Manager of the Hub track also responsible for the operation of the spoke.

**Figure 11: Regional location of tracks, trainers, meetings and greyhounds**

![Figure 11](image_url)

*Source: Nous Group analysis of GRNSW data, and analysis by SGS Economics and Planning, 2013-14 data*

### 4.2.2 Implementation requirements

Before the concept of Centres of Excellence can be further developed, specific financial parameters need to be established. In particular, it is necessary to identify what funding will be available to finance the development and operation of Centres of Excellence over the following twenty years. Related to this
issue is also identifying the estimated number of meetings required per year across NSW, and the number of meetings held at each track. These two parameters will provide guidance on what can be realistically afforded, and thus the number and standard of the Centres of Excellence Hub and Spoke tracks.

A separate issue that may influence the identification of tracks as Centres of Excellence is track type. For example, it is considered that at least one facility should comprise a straight track, which can be used for Masters and Juvenile racing, minimising the risk of injury. A related issue is zoning requirements for any track and facility re-development.

As part of this process is it also necessary to identify opportunities for obtaining additional funding from the NSW and Commonwealth Governments in support of infrastructure development.

Information has been collated by GRNSW to inform the JWG on the indicative capital expenditure associated with establishing a Centre of Excellence facility. This information is based on the recent experience in other Australian states of re-developing tracks, as well as costs incurred by NSW clubs in the course of developing new track facilities. Two sets of costings have been prepared – one based on a one-turn track, the other on a two-track facility. The non-track facilities in both costings are identical. In these indicative costings, the capital expenditure associated with a one-turn track is $2.8 million for the track facilities, and a further $5.7 million for the non-track facilities. In contrast a two-track facility is estimated to cost $5.0 million. These costs exclude land acquisition and car park facilities. It is envisaged that between 10 and 14 acres of land is required for a Centre of Excellence facility.

| Table 4: Indicative capital costs of establishing a Centre of Excellence |
|-------------------------------------------------|-----------------|-----------------|
| **Track facilities**                             | One-turn track  | Two track facility |
| Design                                          | $100,000        | $140,000        |
| Civil works                                     | $1,910,000      | $2,210,000      |
| Racing facilities                               | $430,000        | $780,000        |
| Other                                          | $330,000        | $1,840,000      |
| **Subtotal**                                    | $2,770,000      | $4,970,000      |
| **Non-track facilities**                        |                 |                 |
| Race day kennels                                | $893,000        | $893,000        |
| Grandstand and hospitality facilities           | $2,500,000      | $2,500,000      |
| Slipping track                                  | $275,000        | $275,000        |
| GAP including Vet clinic                        | $1,925,000      | $1,925,000      |
| Television broadcast infrastructure             | $150,000        | $150,000        |
| **Subtotal**                                    | $5,743,000      | $5,743,000      |
| **Total**                                       | **$8,513,000**  | **$10,713,000** |
Finally, the JWG considered who would own the Centres of Excellence facilities. Due to the quantum of envisaged GRNSW investment, the JWG favours ownership residing with GRNSW, with clubs required to lease facilities. To facilitate full financial transparency, GRNSW should seek a commercial return on its facilities, which may likely be financed, in large part, from payments to clubs.

4.2.3 Performance measurement and reporting

The JWG considers that an extensive range of performance measurement and reporting must accompany the implementation of Centres of Excellence. This issue is discussed in Section 5.5.2, where the need for a new club reporting framework is identified. A specific area where track-level reporting should be enhanced is that associated with track quality, greyhound injuries and welfare. Specific measures that should be considered include:

- number of injuries by track, and type injury
- number of deaths by track, and cause of death
- measures of track quality.

Recommendation 6

The JWG recommends that GRNSW undertake further specification and analysis of the Centre of Excellence concept. This further work should identify:

- the optimum number of race meetings, and type, required to be supported by the track network
- the specific features of a Centre of Excellence including facilities to support education programs, greyhound education facilities, onsite veterinary clinic, hospitality and Greyhounds As Pets facilities
- the locations of Centre of Excellence Hub and Spoke tracks
- indicative costs of establishing and operating a Centre of Excellence facility
- the financial and other resources potentially available to finance the development and operation of Centres of Excellence.

Recommendation 7

The JWG recommends that GRNSW prepare a Metropolitan Racing Strategy, detailing the vision for future metropolitan racing, and identifying facilities and other infrastructure.
5 Regulatory and governance reform

The regulation of the industry by GRNSW has been inadequate. It has failed the wider community, it has failed greyhounds and it has failed the industry too.\(^8\)

The failure of GRNSW to properly discharge its regulatory functions has been acknowledged. This failure by GRNSW has been attributed to poor governance. In response there is a need to implement a new governance model that addresses the changing environment, the changing industry structure and positions GRNSW as an effective regulator controlling the greyhound racing industry with a view to its long term sustainability. It is widely accepted that there is a need to strengthen governance – of both GRNSW and individual clubs.

5.1 Governance reform is required for the long term sustainability of the industry

The JWG is to provide the interim Chief Executive of GRNSW advice on:

...the implementation of a new governance model, including (but not limited to) the appropriate structure of industry administration, particularly the operation and control of race clubs and meetings.

This advice is to be in the form of an implementation plan, specifying the actions required to achieve the following governance strategic objective:

Implement a new governance model to address the changing industry structure, ensuring that the governance structure is appropriate to achieve the long-term objectives of the sport and GRNSW.

5.2 Governance reform is guided by overarching governance principles

The JWG has agreed that consideration of the appropriate governance framework for GRNSW should be guided by the following principles or pillars for effective governance:

- setting direction and providing strong leadership in overseeing reform
- role clarity and governance structure
- accountability and transparency
- engaging with industry and the community
- maintaining governance integrity and putting welfare at the centre.

Each of these principles is explained in more detail in Table 5.

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\(^8\) Opening address of Stephen Rushton SC, Counsel Assisting the Special Commission of Inquiry into the Greyhound Racing Industry in NSW – 28 September 2015, as reported in GRNSW Annual Report 2015 p.2.
Table 5: Principles for effective governance

<table>
<thead>
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<td>The role of the Board in setting direction and overseeing reforms needs to be clearly articulated and understood. The organisation and its structure needs to be aligned with the direction. The culture of the organisation and the industry needs to reflect the animal welfare and integrity objectives of the reform agenda. The organisation and the industry reform requires strong leadership.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Role clarity and governance structures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Certainty about the role of GRNSW is provided by the Act. The role of the Board and its decision making accountability and how this is delegated and exercised by the Chief Executive and staff of GRNSW needs to be clear. There needs to be clarity about how the dual role of the GRNSW as regulator and controller of the industry is managed and ensures any conflict is avoided. The form of the governance structure and board membership needs to reflect the skill and capability required to provide strategic direction to the organisation.</td>
</tr>
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<table>
<thead>
<tr>
<th>Accountability and transparency</th>
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<tbody>
<tr>
<td>Create certainty regarding the accountability of leaders within the organisation and of Board members. Ensure comprehensive reporting is undertaken and that obligations are met. Publish information and policies to enable the industry to be clear on how the functions of the regulator are being undertaken.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Engaging with industry and the community</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensure a governance culture and maintain relationships that feature trust, openness, robustness, candour, accountability and innovation. Ensure there are sound policies for board renewal. Effective engagement mechanisms are in place and are followed, with relevant and timely governance information being made available to stakeholders.</td>
</tr>
</tbody>
</table>

5.3 GRNSW is a statutory agency with regulatory and industry control functions

5.3.1 GRNSW is an independent statutory agency

GRNSW is a body corporate independent of Government, established under the Greyhound Racing Act 2009 (the Act). It is charged with providing strategic direction and leadership in the development, integrity and welfare of greyhound racing in NSW, ensuring its competitiveness and long-term commercial viability for the benefit of members of the sport.

The Greyhound Racing Act 2009 led to GRNSW taking responsibility of regulatory affairs and commercial oversight. At the same time, GRNSW’s industry representative board was replaced by an independent board.

The GRNSW board comprises five members recommended for appointment by a Selection Panel (which is established by the Minister under Section 7 of the Act) and appointed by the Minister to give effect to the recommendations of the Selection Panel. The Act provides that a person is not eligible to be a member of the board if they are associated with greyhound racing as an employee, a registered person or licence holder, have a relevant criminal conviction, are an undischarged bankrupt, or are mentally incapacitated.
The Selection Panel is required to recommend candidates based on merit, abilities, qualifications, experience and personal qualities.

GRNSW may employ a chief executive who is responsible for the day-to-day management of GRNSW.

GRNSW is required to prepare an annual report that includes copies of the financial statements and this report is to be tabled in Parliament.

GRNSW is required under the Act to prepare strategic plans and to undertake formal consultation on a regular basis with the GRICG and other stakeholders in connection with the initiation, development and implementation of policies for the promotion, strategic development and welfare of the greyhound industry.

5.3.2 GRNSW has both regulatory and commercial functions

Similar to other industry regulators GRNSW has a wide range of functions and powers that include education, licensing and registration, inspection and investigation of conduct by individuals and by racing clubs.

GRNSW also has responsibility for distributing money from commercial arrangements and allocating greyhound race meeting dates to greyhound racing clubs. GRNSW is the central controlling body for the conduct of greyhound racing in NSW.

The current functions of GRNSW include:

- control, supervise and regulate greyhound racing in NSW
- register greyhound racing clubs, greyhound trial tracks, greyhounds, owners and trainers of greyhounds, bookmakers for greyhound racing and other persons associated with greyhound racing
- initiate, develop and implement policies considered conducive to the promotion, strategic development and welfare of the greyhound racing industry in NSW
- distribute money received as a result of commercial arrangements required by the Totalizator Act 1997 and via Race Field Information Use Fees
- allocate to greyhound racing clubs the dates on which greyhound races may be conducted.

GRNSW has wide ranging powers under the Act to:

- investigate and report on proposals for the construction of new tracks and inspect new and renovated tracks
- supervise the activities of greyhound racing clubs, registered persons and others engaged or associated with greyhound racing
- inquire into, and deal with, any matter relating to greyhound racing and refer matters to stewards
- direct and supervise the dissolution of greyhound racing clubs that cease to be registered
- appoint an administrator to conduct the affairs of a greyhound racing club
- order an audit of the books of a club
- scrutinise the constitution of a club
- disqualify a greyhound
• exclude an unregistered greyhound
• prohibit a person from attending or taking part in a greyhound racing meeting
• impose a penalty on a registered person or an owner
• publish information to inform the public about greyhound racing
• undertake research and investigation into all aspects of the breeding of greyhounds and of greyhound racing generally.

It does not have power to conduct greyhound racing on its own behalf.

GRNSW also has the power to set minimum standards for conduct of races and greyhound race meetings. GRNSW may set minimum standards in connection with:
• racecourse design and construction
• racecourse facilities and amenities
• greyhound training facilities
• financial management of greyhound racing meetings including the management of the costs
• fees and charges imposed
• prizemoney paid
• starters, appearance and other fees paid.

These standards may be set by a direction in writing to clubs, as a condition of the registration of clubs and as a condition of the allocation of dates for racing meetings. GRNSW is required to consult with clubs in relation to any proposal to set minimum standards and must give clubs the opportunity to be heard.

5.3.3 The structure of the GRNSW has been realigned to improve its effectiveness

GRNSW has undergone an organisational refresh and has appointed a new leadership team. GRNSW is divided into four core areas of racing operations, compliance and integrity, welfare and wagering and media.

Figure 12 details the current GRNSW structure.
5.4 There is a range of suitable models to ensure effective regulation and control of the industry

The JWG has considered the options for the appropriate institutional arrangements for the oversight of the greyhound racing industry. The central question that has been addressed by the JWG is whether it is appropriate for GRNSW to be responsible for both the regulatory and commercial functions of the industry.

There are two broad views on this question. On the one hand it is considered that a single organisation with responsibility for regulating the industry (the regulatory function) and for the operational management and control of racing (the commercial function) means there are divergent objectives that place GRNSW in a constant state of conflict. The JWG was cognisant that this is likely the dominant perspective in the community. On the other hand, there is a view that regulating the industry and controlling the commercial operations enable GRNSW to develop a sustainable industry and to drive a positive culture of compliance that can put animal welfare at the centre. The JWG deliberated on these divergent views, and concluded that there is some middle ground.

In considering the options relating to the structure of GRNSW the JWG also raised a number of other factors that are critical for the future sustainability of the industry.

5.4.1 There needs to be a demonstrable change to current organisational arrangements

The JWG considered the question of whether it is appropriate for GRNSW to be responsible for both the regulatory function and the commercial function. The issues were well understood and the JWG used the principles to guide its consideration of the options. This lead to a discussion about the imperative for change; not only that there is a need to maintain the momentum currently evident within GRNSW but that there needs to be a demonstrable shift from the current arrangements. In that regard the status quo was not considered to be a suitable option.

Option 1 GRNSW continues with current arrangements

The JWG recognised that there have been significant changes in the current management and structure of GRNSW. However the JWG was not satisfied that continuing the current structure would provide sufficient indication of commitment to change and demonstrate a level of credible industry willingness to commit to change if no tangible and visible structural changes were made. In this regard the JWG did not consider it was credible to recommend continuation of the current arrangements.

Option 2 GRNSW continues as both the regulator and controller of the racing function (the commercial function)

The JWG considered the current role and functions of GRNSW are appropriate to be undertaken within a single organisation, with the current organisational structure providing sufficiently clear separation of the regulatory functions and the commercial functions. The view was formed that while there is separation in the current structure with the Racing Operations group separated from the Compliance group, this should be more explicit and be reflected in separate board subcommittees addressing these distinct functions. In this model the corporate functions and legal and policy functions would be provided to both the Commercial and the Regulatory Divisions of the GRNSW.

The JWG considered this the preferred option.
Option 2 is illustrated at a high level in Figure 13. The proposed detailed structure under Commercial and Regulatory is indicative only based on the current structure elements. It includes specific functions relating to welfare, integrity and club services and governance. The Compliance area is proposed to include the additional licensing functions across the greyhound lifecycle. The new regulatory model will require additional resources. A key feature of this model is that while the Commercial subcommittee comprises selected members of GRNSW Board, the Regulatory subcommittee comprises selected Board members and additional members with strong regulatory experience. This could include retired judicial officers or regulatory officials. The Regulatory subcommittee would specifically exclude industry representatives on the GRNSW Board. This approach is similar to that of the Greyhound Racing Victoria (GRV) Integrity Council, with a total of five members. This membership comprises two GRV Board members, and three independent members.

GRNSW would be a statutory entity within the Justice cluster of the NSW Government, and would be responsible and accountable to the Department in accordance with the statutory agency accountability framework applicable in NSW. Appropriate ongoing engagement with the Department and the Minister would be established under this model. Engagement with the Department on policy and legislative changes arising as part of the reform agenda will be required.

To address community concerns regarding the maintenance of commercial and regulatory functions within GRNSW, it will be necessary for GRNSW to indicate publicly that animal welfare and industry regulation will be the first priority of GRNSW, and that commercial consideration will be secondary.

Figure 13: Proposed new structure of GRNSW
Option 3 New structure with GRNSW being the industry controlling body responsible for the commercial development of the industry and a separate regulatory agency

The JWG considered whether a new structure for industry commercial functions separate from regulatory functions was a more appropriate structure and more likely to meet community and government expectations. The JWG did not prefer this model.

If GRNSW is to take central responsibility for race meetings under a new industry model and be responsible for the management of Centres of Excellence and the conduct of race meetings, there is a stronger argument for a clear separation of the commercial and regulatory functions in the industry. This is further reinforced where the regulatory framework is proposed to be considerably wider in scope and more stringent.

The separated regulatory agency model is illustrated in Figure 14 below. The model illustrated shows GRNSW continuing as a separate Board with a Chief Executive responsible for the Commercial functions identified in Figure 13 above. It maintains a dotted line separation from government and the Minister. The separate Greyhound Racing Regulator (which would be established with an appropriate name in the current Act or in new legislation) has a solid line report to the Department and the Minister and would have similar relationships to government as other independent statutory agency regulators. The structure illustrated suggests efficiencies would be gained by continuing with a shared services model for corporate support. This model also includes the addition of the Integrity Commissioner which is discussed below.

Option 4 A new structure that separates the regulatory function for the three racing codes into a separate independent regulator responsible for all regulatory functions

The JWG considered this option in its deliberations but formed the view that it did not address the current demand for reform of the greyhound racing industry and that it was not an option that should be considered in the immediate term.
5.4.2 A new Board composition will improve governance and industry engagement

Eligibility to be extended to industry participants
As noted above the GRNSW consists of five members recommended for appointment by the Selection Panel to the Minister. The Act provides that a person is not eligible to be a member of GRNSW if they are associated with greyhound racing as an employee or as a registered person or licence holder.

The JWG is of the view that the current board structure is not appropriate, with the following two options identified:

1. increase board composition to seven members selected on merit based on appropriate skill sets. Board members would be selected by an independent selection committee making recommendations to the Minister without limiting industry representatives being on the board

2. increase board composition to seven members, with five independents and two representatives from the industry selected by an independent selection committee (assisted by a recruitment agency) making recommendations to the Minister.

The JWG recommends a new board composition that includes representatives with industry experience and appropriate skills and qualifications. A skills matrix for the GRNSW Board should include: Finance and audit, risk and compliance, governance and other board experience, government and policy, community relations, marketing, legal and regulatory skills. Further the Board should meet agreed diversity criteria including gender, age and represent a cross section of the community.

The JWG considered the Board composition would be enhanced with the addition of membership by suitably qualified and skilled people with industry experience and with the addition of people with experience of animal welfare. The JWG took the view this would enhance industry engagement and contribute to buy-in of industry participants.

Board members must be suitably qualified
The JWG also recommends that to be eligible for appointment to the Board, appointees must have a suitable qualification or experience as a Board member such as an Australian Institute of Company Directors (AICD) course and preferably the company director qualification that demonstrates a high standard of knowledge. The JWG is strongly of the view that all GRNSW board members should have appropriate skills and experience. It is also acknowledged that board members should be appropriately remunerated to attract the best possible candidates.

A strong focus on conflicts of interest is required
As part of the ongoing operation of the board, it will be necessary to ensure conflicts of interest are identified and appropriately managed. While the selection process will likely identify potential board members with conflicts, conflicts may nevertheless arise in relation to specific board deliberations. This is particularly likely if the Board is to include members with industry expertise. It will be important for Board members to identify any such conflicts as they arise.
The selection panel approach is appropriate

The JWG reviewed the current arrangement whereby a selection panel makes recommendations to the Minister and it was agreed this arrangement provides the right balance of independence and transparency and should be continued. However, stricter adherence to selection criteria is required. The JWG also emphasised the need for diversity of Board membership including factors such as including gender, age, skills and experience and represent a cross section of the community.

Recommendation 9

The JWG recommends:

- a new board structure that includes five independent and two independently selected industry representatives
- a skills matrix for the Board that includes specific finance, risk, governance, community relations, marketing, legal and regulatory skills and animal welfare experience
- that only those with suitable qualifications be eligible for board appointment
- the continuation of the current board selection arrangements with a focus on diversity.

5.4.3 Increased transparency and accountability is required to avoid the mistakes of the past

The JWG is cognisant of the need to maintain integrity and transparency in the industry into the future. This is required to avoid repeating mistakes of the past.

The Act currently requires preparation of an annual report that includes financial statements and this report is tabled in Parliament. Table 6 provides an outline of the performance metrics currently reported publicly by GRNSW.

Table 6: Performance metrics currently reported by GRNSW in its 2015 annual report

<table>
<thead>
<tr>
<th>Performance topic</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Finances</td>
<td></td>
</tr>
<tr>
<td>GRNSW financial performance</td>
<td>• Statement of profit or loss and other comprehensive income for the financial year.</td>
</tr>
<tr>
<td></td>
<td>• Statement of Financial Position.</td>
</tr>
<tr>
<td></td>
<td>• Statement of Changes in Equity.</td>
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<tr>
<td></td>
<td>• Statement of Cash Flow.</td>
</tr>
<tr>
<td></td>
<td>• Notes to the Financial Statements.</td>
</tr>
<tr>
<td>Funding of clubs</td>
<td>• List of funding (Safety, Racing &amp; Welfare Maintenance Fund, administrative and other) provided to each club/entity.</td>
</tr>
<tr>
<td>Capital developments</td>
<td>• List of infrastructure projects with location, value and description of work.</td>
</tr>
<tr>
<td>Wagering activity</td>
<td></td>
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</tbody>
</table>
Performance topic | Description
--- | ---
Wagering turnover NSW greyhound racing | • Wagering turn over growth –totalisator, corporate and total.  
• Racing activity by metro, TAB and non-TAB – number of race meetings, races. and starters.  
• Total NSW TAB turnover and corporate wagering turnover on NSW greyhound meetings.  
• Market share of NSW greyhound product with TAB.
Return to participants | • Participants returns – prizemoney and travel subsidies paid.
Racing integrity | • Number of investigations undertaken across year and outcome (closed, referral to integrity department and still active).  
• Number of disciplinary actions undertaken across year and outcome.  
• Number of appeals to a disciplinary action across year and outcome.  
• Number of calls to the welfare and integrity hotline.  
GRNSW compliance activity | • Number of swabs conducted by year and percentage of positive swabs.
Swabbing statistics | • Changes to racing rules and protocols (e.g. grading policies).
Racing sector protocols | • Greyhound statistics over 5 years including litters registered, greyhounds whelped, average per litter, natural services, FSI services and greyhounds named.  
• Lifecycle tracking statistics over 5 years starting with greyhounds whelped and then proportion of those: named, which have raced, now deceased, now retired.
Sector profile | • Participants over 5 years including trainers, owners/trainers and attendants.
Welfare of greyhounds | • Greyhound statistics over 5 years including litters registered, greyhounds whelped, average per litter, natural services, FSI services and greyhounds named.  
• Lifecycle tracking statistics over 5 years starting with greyhounds whelped and then proportion of those: named, which have raced, now deceased, now retired.
Participant engagement | • Participants over 5 years including trainers, owners/trainers and attendants.

GRNSW has proposed that the current accountability requirements be supplemented with quarterly reports to the Minister and GRICG (or its replacement). These reports will evaluate the success of consultation activities as well as reporting on actions taken by GRNSW in respect of animal welfare and integrity, including policy development and implementation and specific regulatory action.

In addition to the current public reporting, a number of additional performance measures and data are considered by the Board. The available information that is reported to the Board is shown in Table 7 below. This information is provided for consideration of what, if any, should be considered for reporting to government, what additional information can be reported publicly and to the industry on a more regular basis than annually. The JWG considers that those measures italicised below might be appropriate to report publicly.
Table 7: Performance metrics currently reported to the GRNSW Board

<table>
<thead>
<tr>
<th>Performance topic</th>
<th>Description</th>
</tr>
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<tbody>
<tr>
<td><strong>Finances</strong></td>
<td></td>
</tr>
<tr>
<td><strong>GRNSW financial performance</strong></td>
<td>‡ Profit and Loss summary statement for last financial year.</td>
</tr>
<tr>
<td></td>
<td>‡ Balance sheet summary for last financial year.</td>
</tr>
<tr>
<td></td>
<td>‡ Profit and loss summary statement for last two months.</td>
</tr>
<tr>
<td><strong>Clubs financial data</strong></td>
<td>‡ Financial statements</td>
</tr>
<tr>
<td></td>
<td>‡ Financial performance (TAB and Non-TAB clubs) encompassing expenditure, profit margin, solvency, working capital and entrepreneurship ratios.</td>
</tr>
<tr>
<td><strong>Capital developments</strong></td>
<td>‡ List of capital applications that have been approved, by club, project description, total cost and funding type.</td>
</tr>
<tr>
<td><strong>Wagering activity</strong></td>
<td></td>
</tr>
<tr>
<td>Comparison of wagering turnover across events</td>
<td>‡ TAB turnover for all events.</td>
</tr>
<tr>
<td></td>
<td>‡ Greyhound/harness/thoroughbred share of TAB turnover.</td>
</tr>
<tr>
<td></td>
<td>‡ NSW TAB turnover on NSW Greyhound/harness/thoroughbred events.</td>
</tr>
<tr>
<td>Wagering turnover for each event – greyhound,</td>
<td>‡ Monthly and year to date figures, segmented by Parimutel, Fixed Odds, Pari-mutuel &amp; Fixed Odds.</td>
</tr>
<tr>
<td>harness, thoroughbred</td>
<td>‡ Monthly revenue and growth of wagering sales on NSW Greys in NSW and nationally.</td>
</tr>
<tr>
<td>Wagering sales by source</td>
<td>‡ Total turnover and growth by wagering sector (totalisators, corporate bookmakers, betting exchanges).</td>
</tr>
<tr>
<td></td>
<td>‡ Market share of turnover, by controlling entity (e.g. Sportsbet).</td>
</tr>
<tr>
<td></td>
<td>‡ Sales growth on NSW Greys by state TABs, corporate bookmakers, betting exchange sales.</td>
</tr>
<tr>
<td>Wagering sales by time/location</td>
<td>‡ Average NSW TAB sales by track, day of week and time slot.</td>
</tr>
<tr>
<td><strong>Racing integrity</strong></td>
<td></td>
</tr>
<tr>
<td>Swabbing statistics</td>
<td>‡ Swab data by track, including reason for swab and outcome if not negative.</td>
</tr>
<tr>
<td></td>
<td>‡ List of positive swab offences to be followed up including details of participant, track, delay reason and substance concerned.</td>
</tr>
<tr>
<td></td>
<td>‡ Associated appeals and inquiries.</td>
</tr>
<tr>
<td><strong>Other</strong></td>
<td></td>
</tr>
<tr>
<td>Community information and education</td>
<td>‡ Mentions of GRNSW in the media across print, radio, TV and online.</td>
</tr>
<tr>
<td></td>
<td>‡ Website statistics (e.g. unique visits, page views) for a number of sites.</td>
</tr>
<tr>
<td></td>
<td>‡ Membership numbers of thedogs.com.au, Dogs TV, email newsletters.</td>
</tr>
<tr>
<td></td>
<td>‡ Social media statistics (e.g. Twitter, YouTube).</td>
</tr>
</tbody>
</table>

*Note: Italicised text identifies measures the JWG considers might be appropriate to report publicly*
The JWG recommends increased accountability and transparency through increased reporting to government and to the public.

In addition to the current reporting the JWG believes there should be ongoing public reporting against progress on implementing the strategic action plan for reform of the industry to effectively demonstrate improvements in the conduct of the industry.

In this regard the JWG agreed there should be specific animal welfare and integrity measures developed to assess the outcomes achieved. These recommendations align with the current proposals being considered by GRNSW. These current proposals are set out in Table 8.

Table 8 Additional performance metrics being considered

<table>
<thead>
<tr>
<th>Performance topic</th>
<th>Description</th>
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</table>
| Injury, fatality and euthanasia | • Establish an additional Racing Greyhound Welfare Monitoring Report, to monitor greyhound racing injury, fatality, and related euthanasia including a summary of reporting on greyhound racing injury and fatality.  
  • Report on greyhound racing injury and fatality occurring in all race meetings in the GRNSW Annual Report.  
  • Draw on relevant information from veterinary surgeon reports.  
  • Veterinary Examination Details Report template is amended to make reporting on injury, fatality and euthanasia clearer. |
| Stewards reports       | • Steward Reports continue to include reporting of greyhound racing injury and fatality and also adopt reporting of related greyhound euthanasia. |

The JWG also considered the performance measurement and reporting framework relating to the additional regulatory functions proposed for monitoring and compliance across the lifecycle. It was identified that information should be made publicly available relating to each stage of the cycle including, for example, education, compliance, monitoring and enforcement, and public information about registration and licensing activity. Ideally the measurement and reporting framework would include output and outcome measures to demonstrate effectiveness and provide a baseline against which to assess improvement. Examples of suggested reporting are in Section 3.4.1. The JWG recognised the complexity of this task and suggested that in the first instance the focus be on developing some risk based targeting for activity levels.

The JWG also considered that increased accountability and transparency is required to restore community trust and to ensure GRNSW and the industry maintains the momentum for reform. The JWG felt this was a critical element of the required industry culture change.
5.4.4 A new approach to integrity should be introduced

Currently the role of integrity auditor of GRNSW is defined in the Act and includes the following functions:

- the primary oversight of and providing advice on those aspects of the functions of GRNSW that relate to stewards, drug testing, and control and registration
- accepting complaints in relation to the exercise of functions by a greyhound racing official and a requirement to investigate those complaints.

The JWG considered the role of the Integrity Auditor was too limited and that a wider concept of integrity oversight that was not part of GRNSW is required.

The JWG recommends a new approach to integrity be introduced with the appointment of an **Integrity Commissioner** who is able to investigate complaints about integrity and welfare issues at arm’s length from GRNSW and whose oversight is not limited to GRNSW but is able to consider all complaints about integrity in the industry, including the conduct of participants. Further, the Integrity Commissioner should be able to undertake own-motion (self-initiated) investigations, and special inquiries referred by the Minister.

The JWG considered this improvement would enhance the overall governance and regulation of the industry and would complement the institutional arrangements. The group was of the view that it was important to have a separate complaints body where the GRNSW is recommended to continue as a single organisation responsible for both commercial and regulatory functions.

**Recommendation 11**

The JWG recommends the appointment of a greyhound racing Integrity Commissioner.
5.4.5 Industry consultation and engagement should be enhanced with a new approach

Enhanced engagement and communication with industry and the community was a theme that came through a number of the discussions of the JWG.

The Greyhound Racing Industry Consultation Group (GRICG) is established under the Act and has the function of consulting with and making recommendations to GRNSW on matters concerning greyhound racing in NSW. The GRICG is required to meet at least six times a year.

The JWG considered how best to establish effective industry consultation mechanisms. It considered two options:

- **Option 1** – Maintain current industry engagement functions such as the GRICG and ensure industry participants are aware of the range of consultations and issues, with this function appropriately resourced.
- **Option 2** – Enhance industry and community engagement functions to increase the formality of references by the Board for strategic industry, governance or regulatory advice. Members would be formally appointed to the Committee, and will include particular industry, consumer, animal welfare and other interests.

The JWG does not consider the GRICG is appropriate in its current form. The JWG believes a new committee with a clearer role in advice, with members formally appointed, would improve the engagement arrangements. The JWG recommends consideration is given to a formal industry advisory committee structure that could provide independent advice to the Board and provide advice and assistance to GRNSW and, in particular, gain industry support and commitment to change.

The focus of the new committee would be on strategic issues, with a potential title the ‘Greyhound Racing Strategy Advisory Committee’. This new committee would not consider the minutiae currently considered by the GRICG, but instead consider policy and strategic issues. It could be provided with specific policy tasks by reference from the Board where an alternative and independent source of advice is sought on a particular issue. Eligibility for appointment to the Greyhound Racing Strategy Advisory Committee would be the same as eligibility for appointment to the Board, with appropriate gender, age and community representation as well as skills, experience and knowledge qualifications.

The Greyhound Racing Strategy Advisory Committee would need to be provided with adequate secretariat support by GRNSW, with members appropriately remunerated for their time.

**Recommendation 12**

The JWG recommends the establishment of a new Advisory Committee, potentially called the Greyhound Racing Strategy Advisory Committee.
5.5 A move to establishing Centres of Excellence requires improved club governance

NSW greyhound racing clubs are responsible for the provision of greyhound racing on the dates allocated by GRNSW.

The functions of NSW greyhound racing clubs include:

- preparation for, and conduct of, greyhound trials and race meetings
- provision of all applicable greyhound racing related information to GRNSW in a timely fashion (e.g. Race fields, results)
- administration of all club business activities
- diligence in maintaining and improving the facilities at the venue to provide a safe and enjoyable experience for greyhounds, registered participants and spectators
- promotion of greyhound racing to the broader community.

Greyhound racing clubs are independent entities. Some are corporations under the Corporations Act (Cth), with the majority incorporated associations under the Associations Incorporation Act 2009 (NSW).

5.5.1 Greyhound racing club boards must all meet higher standards

GRNSW has established operating standards and guidelines for greyhound racing clubs which were introduced to improve corporate governance, including financial management. The standards set out the minimum requirements that new greyhound racing clubs must achieve to obtain registration. The requirements include:

- the board structure is to include both a mix of independent and member elected representatives. The board structure is to include a total of 5 to 7 directors, with the majority of the board elected by club members. At least 2 to 3 board members should be independent directors appointed by a selection panel that includes a representative from GRNSW, with a recruitment firm potentially used to identify candidates.
- the board members should have a mix of skills and qualifications including law, accounting, construction, marketing, event management or other qualifications or experience the selection panel considers appropriate. As per the proposed requirements for GRNSW Board members, racing club board members should also possess a suitable qualification or experience as a board member, including attendance at an AICD course.

The JWG considers that there is a need for improvements in club governance. There is currently significant variability in the governance (and operating) practices of greyhound clubs across NSW. It may be necessary for board members to be remunerated for their activities, with a view to attracting the most suitable candidates. This will be a significant change from current arrangements, whereby club board members are typically volunteers. There is added impetus for improvement if there is a move towards the proposed Centres of Excellence, with clubs to be responsible for the operation and maintenance of significant, and costly, track and non-track infrastructure.

In addition to improved Board representation and skills and qualifications, the JWG recognises that there needs to be improved club management with skilled and experienced administrators and managers. At present, a representative of GRNSW is to be invited or given an opportunity to be on the selection panel for the club manage of new clubs. The JWG considers this should be the case for the selection of all club managers, particularly following the move to the Centres of Excellence model.
5.5.2 The control and oversight of clubs by GRNSW should be increased

NSW greyhound racing clubs currently operate as entities independent of GRNSW. This means that each club has its own board and management.

One issue considered by JWG is whether the club based industry structure remains appropriate in the current environment or whether a new industry structure that centralises the control of greyhound racing to GRNSW is preferred. This would make GRNSW responsible for all aspects of club and track operation. Two distinct options were considered by the JWG. Resolution of this issue is given added impetus by the proposed move to Centres of Excellence, where clubs may be responsible for the operation and maintenance of significant capital infrastructure.

Option 1 – Enhance the current approach and provide for increased oversight by GRNSW

The current approach to greyhound club governance is that clubs are registered with GRNSW. Clubs are required to submit reports detailing performance against 16 operating standards throughout the financial year. The operating standards are designed to facilitate standards of best practice governance, particularly in the areas of risk management, racing programs, racecourse facilities and financial management. The operating standards outline the minimum requirements for club registration. In addition to the current operating standards, the GRNSW should develop a risk and control standard to be adopted by all clubs to address potential theft and allegations of fraud. The opportunity to introduce standardised systems for all clubs should also be explored. Establishing an industry audit function either within GRNSW or appointing an external audit firm is required to improve governance and to provide assurance that clubs are appropriately managing risk.

The JWG agreed that GRNSW should increase its oversight role, and control over clubs and how they operate by imposing higher standards in respect of club registration and eligibility for registration. In doing so, it may be appropriate to vary standards in response to the circumstances of individual clubs.

Each of the clubs is a separate entity and is required to have a constitution that accurately reflects how the club operates in practice. The JWG considered that renewal of club constitutions should be on the basis of a standard constitutional model that will underpin enhanced club board membership structures and enhanced club management arrangements. To enhance community participation in greyhound racing, the JWG also considered that all clubs should have an open membership model, with their possible tiers including full and social members.

The JWG is concerned that a move away from the clubs model will affect the willingness of volunteers to continue to contribute as they currently do and that the local community involvement and engagement would be adversely affected.

In addition, the JWG considered that it was important that GRNSW is given the power to take control of a club and is permitted to be responsible for conducting race meetings if a club fails. Separately, it is
appropriate for clubs to be permitted to enter into joint ventures from time to time. This could be between clubs, or clubs and other entities.

The enhanced model of governance and its relevant elements are set out in Figure 15. The features of the enhanced model include that each club remains as a separate entity (noting that under the Centres of Excellence there will be fewer clubs), that each club has a consistent constitution based on a model constitution, that the Board membership includes 5-7 members who meet a specified skills mix, and that GRNSW is included as part of the selection panel for board and general manager appointments. Club staff would continue to be employed by the clubs themselves.

The JWG prefers this option.

**Figure 15: Enhanced oversight of club governance**

**Option 2 – A new industry model with GRNSW having central control**

The JWG has mixed views as to whether the move to Centres of Excellence should also include a major structural change to the industry by moving away from a clubs model to a centralised model in which the GRNSW Commercial Division (as illustrated in Figure 13, p. 60) is responsible for all aspects of club and track operation.

There were some views that GRNSW should have more central control of break-in and education centres and have central responsibility for trialling of greyhounds. These measures were also seen as part of improving the lifecycle management of greyhounds which is important for addressing overproduction.

The alternative model for club governance is illustrated at Figure 16 below.

This proposed model includes the GRNSW Commercial Division being responsible for centralised control of the tracks and race meetings and employer of all staff at the tracks and responsible for the condition and maintenance of the tracks, capital investment, facilities, and overall management of race meetings. This model could be implemented through a regional management model that is common in other organisations and includes a regional operations manager who would be responsible for the Centre of Excellence in the region.
This approach could give rise to the perception that there is a conflict of interest for GRNSW in being accountable for the commercial operation and for the regulatory functions.

Figure 16: New industry central management model

The JWG noted that the club governance issue is linked to the structural/governance changes recommended for GRNSW and is part of implementing the new Centres of Excellence model.

The alternative industry transformation option that emerges for consideration from this analysis of possible industry governance and structure is creating a separate organisation called GRNSW Commercial. This body would have central responsibility and management and control of a small number of Centres of Excellence, grading, programming, and the safe conduct of race meetings, with animal welfare at the centre.

And the creation of a separate regulatory agency with significantly expanded regulatory responsibilities across the whole of the lifecycle with expanded powers and resources.

The JWG does not support this option.
**Recommendation 14**

The JWG recommends:

- an enhanced club governance model be adopted with clubs required to introduce a standard constitution
- GRNSW develop a new club reporting framework to increase accountability of clubs which could include risk management plans and financial accounts
- GRNSW play a role in the selection of the club Board and Manager
- the legislation be changed to enable GRNSW to conduct race meetings in the event that a club has failed, or is unable to meet its obligations.

### 5.6 A proposed overall reporting framework

Based on Sections 3.4, 4.2.3 and 5.4.3, Table 9 documents the overall reporting framework proposed by the JWG. This list is indicative, and should be subject to further discussion and refinement. The content of Table 9 encompasses existing GRNSW reporting that the JWG considered should be continued, as well as new items that should be reported into the future. In some cases, items that have previously been reported to the GRNSW board should now be publicly reported.

**Table 9: A proposed overall reporting framework**

<table>
<thead>
<tr>
<th>Report Section</th>
<th>Reporting</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Clubs</strong> (Section 4)</td>
<td>Existing</td>
</tr>
<tr>
<td></td>
<td>• Reporting to government and to the public; particularly reporting against progress on implementing the Strategic Plan.</td>
</tr>
<tr>
<td></td>
<td><strong>Required</strong></td>
</tr>
<tr>
<td></td>
<td>• A more complete performance measurement and reporting framework is required that demonstrates the new regulatory activities and reports the activities of clubs.</td>
</tr>
<tr>
<td><strong>Welfare: Greyhounds</strong> (Section 3)</td>
<td>Existing</td>
</tr>
<tr>
<td></td>
<td>• Greyhound statistics over 5 years including litters registered, greyhounds whelped, average per litter, natural services, FSI services and greyhounds named</td>
</tr>
<tr>
<td></td>
<td>• Lifecycle tracking statistics over 5 years starting with greyhounds whelped and then proportion of those: named, which have raced, now deceased, now retired.</td>
</tr>
<tr>
<td></td>
<td><strong>Currently under consideration by GRNSW</strong></td>
</tr>
<tr>
<td></td>
<td>• Report on greyhound racing injury and fatality occurring at all race meetings.</td>
</tr>
<tr>
<td>Report Section</td>
<td>Reporting</td>
</tr>
<tr>
<td>----------------</td>
<td>-----------</td>
</tr>
<tr>
<td><strong>Welfare: Participants (Section 3)</strong></td>
<td><strong>Required</strong></td>
</tr>
<tr>
<td></td>
<td>Enhanced monitoring and owner/participant reporting at key stages in their lifecycle, including:</td>
</tr>
<tr>
<td></td>
<td>• number of greyhounds by age</td>
</tr>
<tr>
<td></td>
<td>• number of socialisation clearance tests undertaken by lifecycle stage, including details of outcome</td>
</tr>
<tr>
<td></td>
<td>• number of pups that die prior to reaching rearing age</td>
</tr>
<tr>
<td></td>
<td>• estimated life expectancy of greyhounds at whelping</td>
</tr>
<tr>
<td></td>
<td>• number of deaths, by age and gender</td>
</tr>
<tr>
<td></td>
<td>• average annual starts per active greyhound racing, with this data potentially also reported as a distribution</td>
</tr>
<tr>
<td></td>
<td>• injury rates of sires and dams</td>
</tr>
<tr>
<td></td>
<td>• average career lifespan of ‘retired’ greyhounds</td>
</tr>
<tr>
<td></td>
<td>• average age of ‘retired’ greyhounds.</td>
</tr>
<tr>
<td><strong>Centres of Excellence (Section 4)</strong></td>
<td><strong>Required</strong></td>
</tr>
<tr>
<td></td>
<td>A new club oversight and reporting framework.</td>
</tr>
<tr>
<td></td>
<td>Track-level reporting encompassing track quality and greyhound injuries. Specific measures that should be considered include:</td>
</tr>
<tr>
<td></td>
<td>• number of injuries by track, and type injury</td>
</tr>
<tr>
<td></td>
<td>• number of deaths by track, and cause of death</td>
</tr>
<tr>
<td></td>
<td>• measures of track quality.</td>
</tr>
<tr>
<td>Report Section</td>
<td>Reporting</td>
</tr>
<tr>
<td>----------------</td>
<td>-----------</td>
</tr>
</tbody>
</table>
| **Existing**   | • Performance metrics currently reported by GRNSW in its 2015 annual report  
|                |   ◦ GRNSW financial performance  
|                |   ◦ funding of clubs  
|                |   ◦ capital developments  
|                |   ◦ wagering activity  
|                |   ◦ wagering turnover NSW greyhound racing  
|                |   ◦ return to participants  
|                |   ◦ racing integrity  
|                |   ◦ GRNSW compliance activity  
|                |   ◦ swabbing statistics  
|                |   ◦ racing sector protocols  
|                |   ◦ sector profile  
|                |   ◦ welfare of greyhounds  
|                |   ◦ participant engagement  
| **Required**   | • Information and policies to enable the industry to be clear on how the functions of the regulator are being undertaken.  
|                | • Quarterly reports to the Minister and GRICG (or its replacement) with such reports to evaluate the success of consultation activities as well as reporting on actions taken by GRNSW in respect of animal welfare and integrity including policy development and implementation and specific regulatory action.  
|                | • Reporting against progress on implementing the strategic action plan for industry reform. |
6 Using grading systems and race programming to improve animal welfare

6.1 Best practice grading and programming will enhance animal welfare

It is necessary to ensure that the GRNSW grading and programming policy supports the overarching reform process. This requirement means that the NSW grading policy must support improved animal welfare outcomes in the industry including but not limited to improved access, incentives and increased career longevity for greyhounds. In addition to providing an opportunity for increased career longevity, there is also a need to ensure that less-competitive greyhounds are able to get a race. This is a key theme that has been identified in discussions within the JWG, and in discussions with the industry, which can be addressed, in part, through changes to both grading and programming policy.

Earlier in 2015, GRNSW commenced a review of the current grading policy. However, this review was placed on hold to enable the JWG to discuss these issues, and develop recommendations.

6.2 Various grading approaches are applied around Australia and the world

To inform the deliberations of the JWG, information was collected on the approach to greyhound grading in other Australian states, as well as New Zealand, Ireland, England and the United States of America. Information was also collected on the approach to grading for thoroughbred racing in NSW. The findings of this comparative assessment are provided in Appendix B.

The focus of this comparative assessment was on identifying the grading approaches. It was not possible within the timelines of the JWG, and with the available data, to assess the effectiveness of the grading approaches. At a minimum, this would involve assessing whether races are ‘well matched’, with their little difference in the race times between the winning and last greyhound. Separately, analysis would be required to identify the extent to which the objective of increasing racing among less-competitive and older greyhounds is being achieved.

A number of themes emerged from the comparative assessment, informing the reform of grading policy in NSW.

- the number of grades ranges between six and nine, with NSW currently having five grades, plus Maiden and Masters
- a greyhounds’ win record is the dominant factor influencing movement between grades. However, in jurisdictions where track layouts are more homogenous (England and Ireland), time standards are used
- there is only limited explicit focus in grading systems in the overseas jurisdictions on animal welfare, particularly through providing opportunities for less-competitive greyhounds. Within Australia, reforms taken in Victoria to provide an additional two grades have been focussed on less-competitive greyhounds
the NSW grading approach is made more complicated than several other jurisdictions by grade movement in NSW being tied to performance at specific tracks

- the application of subjective and objective elements varies greatly between jurisdictions. There are no subjective elements in NSW. In contrast, there is much subjectivity among graders in England, Ireland and NSW thoroughbreds.

Greyhounds Australasia has commenced work to develop a uniform national approach to grading. The themes and principles emerging from this work include that a national grading system will:

- be focused on animal welfare considerations and will consider all potential ramifications for welfare
- have the objective of improving opportunities for all greyhounds to race
- ensure race fields are competitive
- encourage quality by establishing a pathway from entry to elite
- provide for a single ranking system for all Australian greyhounds
- be objective and transparent.

The criteria for determining ranking could include: prizemoney, points allocated for wins and places and deducted for no place, race times and distances. A separate maiden points system could be applied. GRNSW is actively participating in this national work program.

6.3 Fifth grade is dominant in New South Wales

Every greyhound that races in NSW is required to be graded. A greyhounds’ grading determines the races it is eligible to enter, with grading changes dependent on win performance.

There are currently five greyhound grades in NSW (first to fifth). GRNSW estimates 60-70% of greyhounds are fifth grade and around 50 per cent of races are fifth grade.

A greyhound must win a Maiden race before it can be classified as fifth grade. There are also separate races for Maiden and Masters (aged 45 months or older) greyhounds, as well as non-graded (NG) and free-for-all (FFA) races. Within NSW, GRNSW estimates 60-70 per cent of greyhounds are classified as fifth grade. In contrast, in November 2015, 50 per cent of races and 52 per cent of prizemoney were for fifth grade (see Figure 17 below).
The available information indicates that there is clearly a mismatch between the distribution of greyhounds and races by grade. The fact GRNSW estimates 60-70 per cent of greyhounds are in a single grade, was identified by the JWG as being of particular concern.

In contrast, there are seven grades in Victoria. Victoria introduced sixth and seventh grades in January 2015, with the objective of allowing greyhounds to gain more experience before entering fifth grade.

There have been several discussions regarding grading in recent years. Most recently, GRNSW commenced a review of grading policy in 2015, with the review recently expanded due to the broader industry reform process.

### 6.4 Clear aims of the grading policy are needed to guide changes to the system

The aim of the current GRNSW grading policy is to:

- create a fair, equitable and transparent system for participants to compete that ensures greyhounds with the most appropriate form secure starts and are grouped with greyhounds of like ability
• ensure the viability of the industry by promoting the highest standard of racing possible that maximizes the racing career of greyhounds in NSW.

The JWG considers that animal welfare objectives should be explicitly stated within the aims of the GRNSW grading policy. This could be achieved by adding the following objective ‘Provides the opportunity for the greatest possible number of greyhounds to participate in racing, irrespective of their age or experience’.

Recommendation 15

The JWG recommends that GRNSW amend the aims of the grading policy to include the objective: ‘Provides the opportunity for the greatest possible number of greyhounds to participate in racing, irrespective of their racing capability, age or experience.’

6.4.1 A best practice grading system will address animal welfare issues

As noted above, the JWG considers that the application of the current grading policy does not place sufficient consideration on animal welfare concerns, specifically:

• juvenile greyhounds, with the current grading rules, in combination with race programming, often placing young and inexperienced greyhounds into fifth grade before they are ready. A consequence is that greyhounds of proximate ability are not always matched within races

• older greyhounds, with the current grading system not supporting the extension of greyhound racing careers

• weaker and less competitive greyhounds, that often are unable to get a start.

Some of these issues are best addressed through race programming and prizemoney allocations. However, it is considered by the JWG that changes to grading policy have an important contribution to make.

6.4.2 A best practice grading system has a number of features

The JWG considers that that any changes to NSW grading policy should be underpinned by the following features:

• simple and objective

• provides for separate grading of juvenile, older and other weaker and less-competitive greyhounds

• ensures races are a relatively equal playing field.

A positive feature of the current approach is that there is no need for an appeals process, as all decisions are based on an objective assessment of a greyhound’s performance.

6.4.3 Identifying a best practice grading regime for New South Wales

The JWG considered a wide range of options for reform of the current grading approach. Much of the JWG discussions benefited from the insights of members on ‘loopholes’ within the current grading
system. For example, a particular concern was raised about the current masters grading approach, with ‘strong’ older greyhounds able to race in both masters and standard races. It was considered that the masters grade should be removed entirely, with the racing requirements of older greyhounds instead addressed through programming, where both age and recent racing performance are taken into account. However, an overwhelming consideration of the JWG was ensuring that there is appropriate opportunity for younger and less experienced greyhounds, as well as less competitive greyhounds, to race.

**Recommendation 16**

The JWG recommends that GRNSW, as a matter of priority, finalise the NSW grading policy review, giving consideration to the following:

- Integrate the masters guideline into the grading policy, with the racing requirements of older greyhounds primarily considered through programming initiatives
- Consider the introduction of additional grades, such that younger and less experienced greyhounds, as well as less competitive greyhounds, are protected and compete against greyhounds of their own age and ability longer
- Undertake further analysis to determine eligibility requirements for all grades.

### 6.4.4 Programming must support changes to grading systems

The JWG considers that changes to grading policy cannot be considered independently of race programming. Although not a specific element of the terms of reference for the JWG, programming must support the achievement of the aims of the grading policy, and animal welfare objectives more generally. In particular, it is important that programming better reflect the characteristics of *all* greyhounds, and not just the better performers. This issue is highlighted by GRNSW estimating 60–70 per cent of greyhounds are currently racing in fifth grade, but only 50 per cent of the races being for this grade.

As a way of ensuring that races are evenly matched, the JWG considers that options such as preferential box draws and six starter races should be explored. Preferential box draws provide the ability to further refine the placement of a greyhound in races. Such an approach would be suitable for greyhounds that tend to move toward the rail as soon as a race commences, placing itself and other greyhounds at risk of injury. Such a greyhound would be placed in a box adjacent to the rail, alleviating this risk.

Separately, the JWG considers that six starter races should also be considered as a way of enabling younger or less competitive greyhounds to get a race, obtain increased race experience, and to reduce the risk of injury. The JWG does not advice from Tabcorp that races with less than eight starters attract less wagering. However, this issue needs to be considered in the context of the benefits of six starter races, both for maidens and even high value races. Further analysis is required of the overall industry revenue implications of six starter races. Given the nature of the ICA, it may be that setting aside a certain proportion of race programming for six starter races may have an immaterial impact on industry revenues, but have a significant impact on greyhound welfare.

Moving forward, it is imperative that programming is used to enable the less-competitive and younger greyhounds to race. This will likely require GRNSW indicating to clubs its expectations of future race.
programming. It may be necessary for GRNSW to intervene with club programming to ensure the necessary changes are made.

Finally, as part of the programming process, it may be appropriate to ensure certain types of races are focussed on the most suitable tracks. For example, to minimise the risk of injury, Masters racing should potentially be focussed on straight tracks.

**Recommendation 17**

The JWG recommends that GRNSW:

- develop specific objectives for race programming, to be applied by clubs in future programming decisions
- if necessary, proactively influence club programming in the future to ensure the objectives underpinning grading policy changes can be achieved
- examine the feasibility, financial implications and outcomes of introducing preferential box draws and six starter races.
7  Wagering and Financial Reward Landscape

7.1  The future sustainability of the industry depends on improving the wagering and financial rewards landscape

To ensure the future sustainability of the NSW greyhound racing industry, it is necessary to improve the wagering and financial reward landscape. This includes developing the wagering product on offer to appeal to wagerers and attendees alike, and potentially changing how prizemoney is allocated to both attract greater participants and make the sport more sustainable.

7.2  A number of relatively simple actions could improve financial incentives in the industry

The JWG considers that it is necessary for actions to be identified that:

- optimise reward and prizemoney allocations to generate maximum impact in terms of supporting the achievement of animal welfare and financial sustainability objectives
- improve the wagering product
- increase accessibility to bet and view greyhound racing, particularly among younger people.

7.2.1  A review of prizemoney is required

The JWG is cognisant that for many industry participants a major challenge for greyhound racing in NSW is that prizemoney lags that of other states. Most notably, in 2014-15, the average prizemoney per race in NSW was $1,854, compared to $3,289 in Victoria.

Prizemoney levels in NSW are detailed in the Club Funding Policy, with GRNSW allocating funds to TAB clubs to provide for a minimum prizemoney amount for TAB race meetings. These funds provide between $60 (for a third place in Maiden Category C TAB Race meeting) and $5,700 (for a first place in a third/FFA grade Category A TAB Race meeting). Clubs are able to ‘top up’ the funding provided by GRNSW from their own sources (e.g. sponsorship). The distribution of this prizemoney across grades is summarised in Figure 18 below, detailing how 52 per cent of the prizemoney in November 2015 was paid for fifth grade races.

The JWG is of the view that the current allocation of prizemoney by GRNSW to clubs and races is not adequately focused on attracting greater participants, attendees and media coverage, and raising the overall interest in greyhound racing. The JWG is also concerned that the prizemoney allocation is not used to support the achievement of welfare objectives, such as providing an incentive to keep greyhounds racing longer.

Prior to specific changes in prizemoney policy being made by GRNSW, the JWG considers that a detailed review of prizemoney is required, seeking to identify the most appropriate ways to increase average prizemoney levels. The JWG notes that this could be achieved through a combination of reducing the overall number of races and increasing the size of the overall prizemoney pool. However, the JWG acknowledges that this issue cannot be considered in isolation to the other elements of the reform.
process, such as seeking to increase racing opportunities for less competitive greyhounds, and potentially consolidating the number of tracks.

Figure 18: GRNSW prizemoney allocation in November 2015 for TAB racing

The prizemoney review should carefully consider the way prizemoney is allocated across grades. In particular, it is considered that there should be a flattening of prizemoney levels, and that an overarching target should be that the minimum prizemoney for 1st place is $1,000. Consideration should also be given to making constant the prizemoney allocation between places, with the JWG identifying that a distribution of 60 per cent for first, 25 per cent for second and 15 per cent for third place could be the target.

The prizemoney review, in conjunction with the recommended development of a Metropolitan Racing Strategy, should also consider prizemoney levels for metropolitan racing. Finally, a long-term objective should be to move NSW prizemoney levels towards that in other jurisdictions.
Recommendation 18

The JWG recommends that GRNSW:

- undertake a review of prizemoney with a view to increasing average prizemoney per race, while being consistent with other elements of the reform package
- considers application of a flatter prizemoney schedule with a minimum prizemoney target of $1,000 to the winner of TAB races, alongside fixed proportions for prizemoney distribution for places
- as part of the preparation of the Metropolitan Racing Strategy (see Recommendation 7), that the metropolitan prizemoney distribution model be reviewed. This should identify the best and most appropriate format, alongside consideration of grading approaches and how metropolitan racing might be best showcased.

7.2.2 Understanding the optimal number and mix of races will improve safety

The JWG has considered ways to improve the quality of racing from a number of perspectives. This includes reducing track-related interference, increasing average field sizes, and increasing the quantum of distance racing.

Track-related interference needs to be minimised

The JWG is concerned that track-related interference, which often leads to injuries, reduces the quality of the greyhound racing offer and affects the community view of greyhound racing. It is understood that the risk of track-related interference often increases when there are corner starts. One option that has been mentioned is using preferential box allocations to reduce the risk of injury among certain greyhounds. Preferential box allocation may also be used to improve the ‘matching’ of fields, based on past performance. The JWG considers that this option should be explored further.

More distance racing would add variety

Separately, the JWG considers that there is scope to improve race quality by increasing the quantum of distance racing, which will also provide an incentive for changes in breeding lines. The timeframes for the JWG did not allow this issue to be examined in depth. However, it does warrant further examination.

The optimal number and mix of races will inform race programming

The JWG also believes that greater consideration needs to be given to improving the offer by undertaking analysis on the optimum number and mix of races. The findings of this analysis would then be used to inform race programming. The JWG did discuss whether non-TAB racing should be removed entirely, and whether the total number of races should be reduced from around 1,250 per annum, to 1,000.

Having smaller and increased fields, may balance safety and wagering levels

Industry experts indicate that a consistent greyhound race of a full-field and minimal track-related interference is correlated with strong wagering turnover. High level analysis undertaken by Tabcorp provides a guide to the impact of a smaller race field, detailing how wagering turnover drops with field size (see Table 10 below).
Table 10: Field size and wagering turnover

<table>
<thead>
<tr>
<th>Field size</th>
<th>Wagering turnover</th>
</tr>
</thead>
<tbody>
<tr>
<td>8 greyhounds</td>
<td>100.0%</td>
</tr>
<tr>
<td>7 greyhounds</td>
<td>95.5%</td>
</tr>
<tr>
<td>6 greyhounds</td>
<td>93.0%</td>
</tr>
<tr>
<td>5 greyhounds</td>
<td>80.8%</td>
</tr>
<tr>
<td>&lt; 5 greyhounds</td>
<td>64.5%</td>
</tr>
</tbody>
</table>

Source: Tabcorp analysis, undated.

Analysis undertaken by GRNSW indicates that 27 per cent of TAB greyhound races had less than eight starters (average of 7.6 starters per race).

Despite the concern in NSW over the number of races with less than 8 starters, it is noteworthy that six greyhound fields are commonplace in England.

The JWG considers that smaller field sizes may be appropriate for races targeting younger or less competitive greyhounds. Further, the value of wagering may be maintained in six starter races provided there is a high quality field, or for distance races. This is an area requiring further analysis, with the JWG cognisant of not proposing actions that may reduce overall wagering levels.

At the same time, the JWG considers that 10 starter races for straight track racing should be trialled as a priority. Such a move may offset any reduction in wagering levels due to six starter racing, while also providing a safer racing environment for participating greyhounds.

Recommendation 19

The JWG recommends that GRNSW undertake, or commission, further analysis to:

- identify specific proposals to reduce track-related interference
- identify actions required to support increased distance racing across the greyhound lifecycle, programming and other industry elements
- identify an optimum number and mix of races
- identify the feasibility of introducing straight track racing, including for 10 starter races.

7.2.3 Increasing opportunities to bet and view will produce dividends

The JWG considers there is much scope to increase the attractiveness of greyhound racing. Recent analysis by Roy Morgan Research indicates that among greyhound wagerers, the largest age group is 25-34 year olds (34.2 per cent), compared to the largest age group wagering on horse racing being 35-49
Given that the income of 25-34 year olds is yet to peak, it is important for GRNSW to seek to encourage this group to continue and expand their involvement in greyhound racing.

At present, wagerers can bet on greyhound racing through a number of mediums:

- TAB – at betting shops or online
- on-course bookmakers
- corporate bookmakers.

All TAB meets are covered on both radio and television (913 meets in FY15). There were a further 340 non-TAB races that were not covered.

The JWG is of the view that there needs to be an increase in access to wagering on greyhound racing, alongside video streaming of races. This means ensuring that wagerers have the ability to bet on races via various channels including online and digital. Furthermore, existing partnerships with the TAB and corporate bookmakers need to be strengthened, focussing on areas where GRNSW will obtain a financial return via Race Field Information Use Fees and other revenues.

In response, the JWG is identified the following potential actions:

- improve ‘The Dogs’ product (both smartphone application and website) to facilitate wagering. This could comprise tendering wagering access to ‘The Dogs’ product, or even using the site as an open market place for all wagering operators.
- work in conjunction with Sky channel and their affiliates for broader coverage among the various wagering operators across Australia and globally.

The JWG is cognisant that some of these actions will require a national approach, and the co-operation of interstate greyhound racing bodies.

### 7.3 GRNSW needs to balance the competing financial demands

Soon after commencing deliberations, it became apparent to the JWG that there were many inter-dependencies between many of the issues under consideration. While improving greyhound welfare outcomes was the dominant focus of the JWG, the JWG was conscious that financial considerations underpinned the ability for many of its recommendations to be acted on. In many cases, there are trade-offs that require examination. For example, reducing the number of tracks may reduce operating expenditure, but it may reduce access for some industry participants. Similarly, reducing the number of races and race meetings may reduce operating expenditure, as well as affect industry revenues.

To better understand these trade-offs, the JWG considers that GRNSW should develop or commission a financial model that allows identification of an optimum structure where financial returns are maximised. For example, this model should be able to identify the overall financial impact of having fewer tracks while having the associated operating and capital expenditure required for Centres of Excellence. If feasible, it may be appropriate to incorporate animal welfare issues into the model, providing the ability to examine the impact of a reduction in races for breeding requirements, alongside the impact on prizemoney levels.

In the absence of the financial model described above, it is not feasible to assess whether GRNSW has the financial resources required to implement the suite of recommendations identified in this report, as

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well as meeting community expectations of significant improvements in animal welfare, and industry participant expectations of increased prizemoney. However, the sense of the JWG is that current industry revenues are inadequate to finance all aspects of reform in line with expectations. As a consequence, it is likely that GRNSW will need to look at options to increase revenues. One area to consider is seeking NSW Government variation to the terms of the Inter Code Agreement (ICA) whereby wagering revenues are allocated on the basis of each codes share of wagering. In 2014-15, GRNSW received 13.9 per cent of the ICA distribution, whereas greyhound racing wagering accounted for 21.7 per cent of Tabcorp turnover in NSW on NSW racing. GRNSW would have received an additional $19 million in 2014-15, if its share of the ICA distribution was in line with the greyhound racing share of wagering turnover.

Recommendation 20

The JWG recommends that GRNSW undertake, or commission, the development of a financial model that allows for detailed examination of the following issues:

- financial resources required for greyhound welfare and regulation, and resources available for other initiatives
- sensitivity of industry revenues to changes in race numbers and programming
- identification of the optimal number of tracks, and the number of meetings at each track
- financial impact of different standards of Centres of Excellence
- changes to prizemoney allocation.
Appendix A  Terms of Reference

Request for recommendations

1. Greyhound Racing NSW (GRNSW) is to establish a Joint Working Group (the Group) to investigate, develop and provide recommendations to the GRNSW Chief Executive on the strategic direction for greyhound racing in New South Wales.

2. GRNSW requires the recommendations referred to in paragraph 1 to:
   a. Speak to, and further develop, the high level strategic plan developed by GRNSW in conjunction with KPMG. Included within this task is a requirement that the Group consider and provide advice to the GRNSW Chief Executive on the options available to it to implement the strategies articulated in the Strategic Plan, namely:
      i. the development of New South Wales greyhound clubs as Centres of Excellence
      ii. the improvement of wagering and financial reward landscape in New South Wales
      iii. the implementation of a new governance model, including (but not limited to) the appropriate structure of industry administration, particularly the operation and control of race clubs and meetings.
   b. In addition to the matters at paragraph 2(a) above:
      i. conduct a comparative assessment of grading systems within (A) Australian states and territories outside of New South Wales and (B) international jurisdictions
      ii. identify and provide recommendations as to best practice grading systems aimed at improving animal welfare outcomes in the industry, including but not limited to improved access, incentives and increased career longevity for greyhounds
      iii. develop practical steps, actions and/or initiatives which can actively be taken to abolish (or otherwise lessen substantially) the overproduction, and unnecessary euthanasia, of greyhounds in the New South Wales industry.

The participants and independent consultant advice

3. In order to ensure that stakeholders have an opportunity to contribute to the strategic direction for greyhound racing in NSW and what may be perceived as necessary reforms, the Group is to consist of representatives from GRNSW and selected stakeholder representatives.

4. The Group will also be assisted by independent consultant advice to be sourced at GRNSW’s discretion.

Dates for draft and final recommendations

5. Draft recommendations are to be reported to the GRNSW Chief Executive by 18 December 2015. Final recommendations are then due by 29 January 2016 following any suggested amendments to the draft recommendations by the GRNSW Chief Executive.
## Appendix B Comparative information on grading systems

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<tr>
<th>NSW greyhounds</th>
<th>Vic greyhounds</th>
<th>Qld greyhounds</th>
<th>WA greyhounds</th>
<th>NZ greyhounds</th>
<th>Ireland greyhounds</th>
<th>England greyhounds</th>
<th>USA greyhounds</th>
<th>NSW thoroughbreds</th>
<th>SA greyhounds</th>
<th>TAS greyhounds</th>
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</thead>
<tbody>
<tr>
<td><strong>Overarching features</strong></td>
<td>Grading races based on division wins and total wins for each greyhound, providing greyhounds are of the same grade. Pointscore based on last 5 starts determines Order Of Entry. Draw the highest grade of race possible based on available nominations.</td>
<td>Grading races based on division wins and total wins for each greyhound, providing greyhounds are of the same grade. Draw the highest grade of race possible based on available nominations.</td>
<td>Grading races based on division wins and total wins for each greyhound, providing greyhounds are of the same grade. Draw the highest grade of race possible based on available nominations.</td>
<td>Grading races based on division wins and total wins for each greyhound, providing greyhounds are of the same grade. Draw the highest grade of race possible based on available nominations.</td>
<td>Greyhounds are graded on time standards and these are used to formulate the grading process. Race bands are from SS0 – S10, effectively 12 grades for sprints and 10 for distance events 6 greyhounds in a race.</td>
<td>Greyhounds are graded on time standards and these are used to formulate the grading process.</td>
<td>Greyhounds are graded on division wins and total wins for each greyhound, providing greyhounds are of the same grade. Draw the highest grade of race possible based on available nominations.</td>
<td>Step grading, once they win a race they advance a grade.</td>
<td>Grading races based on division wins and total wins for each greyhound, providing greyhounds are of the same grade. Draw a variety of race grades based on available nominations.</td>
<td>Order of Choice ranking based on last 3 starts at track and distance and then last 3 starts anywhere over the same distance category. Step grading, once they win a race they advance a grade. After 3 unplaced runs at a track and distance they drop a grade. Draw a variety of race grades based on available nominations.</td>
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<td>Maiden Grades 1 to 7 Masters</td>
<td>Maiden Grades 1 to 5 includes 1 Novice event</td>
<td>Maiden Grades 1-5 Masters</td>
<td>Maiden Grades 1-5</td>
<td>SS0 – S10</td>
<td>Times: must complete 3 trials then rated according to times.</td>
<td>Maiden to A-D, J and M</td>
<td>Maiden Grades 1 to 6</td>
<td>Maiden Grades 1 to 6</td>
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</table>
#### Definitions

**Maiden**
- Greyhounds that have not won a single race across TAB or Non TAB.
- Greyhounds that have not won a single race across TAB or Non TAB.
- Greyhounds that have not won a single race across TAB or Non TAB.
- Greyhounds that have not won a single race across TAB or Non TAB.
- Classed as Novice
- Greyhounds that have not won a single race across TAB or Non TAB.
- Greyhounds that have not won a single race across TAB or Non TAB.
- Greyhounds that have not won a single race across TAB or Non TAB.
- Horses that have not won a single race across TAB or Non TAB.
- Greyhounds that have not won a single race across TAB or Non TAB.

**Objective vs. Subjective**

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<th>NSW thoroughbreds</th>
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<td>Up – wins in the form of a specific track/distance combination or successfully meeting a threshold (regrade). Down – unplaced performances of a specific track/distance combination.</td>
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<td>Preferences / Order Of Entry</td>
<td>Point score (based on place and race category)</td>
<td>Grade of greyhound</td>
<td>Eligibility</td>
<td>Preferences / Order Of Entry</td>
<td>Very much subjective with club graders having a heavy influence over the makeup of races.</td>
<td>Grade of greyhound</td>
<td>Eligibility</td>
<td>Graders have the sole discretion to determine grade.</td>
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**NSW greyhounds**

- Greyhounds that have not won a single race across TAB or Non TAB.

**Vic greyhounds**

- Grading of races based on division wins and wins for each greyhound. They also have a prizemoney restriction clause. A pointscore system is also in place.

**Qld greyhounds**

- Up – wins in the form of a specific track/distance combination or successfully meeting a threshold (regrade). Down – unplaced performances of a specific track/distance combination.

**WA greyhounds**

- Grading of races based on division wins and wins for each greyhound. They also have prizemoney restrictions. They have discretion over the inclusion of a greyhound in an event.

**NZ greyhounds**

- Objective elements include: Grade of greyhound, Eligibility, Preferences / Order Of Entry.

**Ireland greyhounds**

- Based on time principles.

**England greyhounds**

- Based on time principles.

**USA greyhounds**

- Based on wins. To drop back must have finished fourth or worse in 3 official starts in same grade or more than 1 third place in four starts.

**NSW thoroughbreds**

- Up – wins in the form of a specific track/distance combination or successfully meeting a threshold (regrade).

**SA greyhounds**

- Down – 3 unplaced performances of a specific track/distance combination.

**TAS greyhounds**

- Down – 3 unplaced performances of a specific track/distance combination.
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<td>from oldest to youngest.</td>
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<td>aged 42 months or over.</td>
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Report to the interim Chief Executive of Greyhound Racing NSW from the Joint Working Group
Implementing reform in the New South Wales greyhound racing industry  |  29 January 2016

<table>
<thead>
<tr>
<th>NSW greyhounds</th>
<th>Vic greyhounds</th>
<th>Qld greyhounds</th>
<th>WA greyhounds</th>
<th>NZ greyhounds</th>
<th>Ireland greyhounds</th>
<th>England greyhounds</th>
<th>USA greyhounds</th>
<th>NSW thoroughbreds</th>
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<tr>
<td><strong>Less-competitive</strong></td>
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<tr>
<td>Maiden – after a few starts are unable to gain a preference and are relying solely on point score.</td>
<td>Grades 6 &amp; 7 implemented to provide access to racing for non competitive greyhounds.</td>
<td>Drop back grade; 3 consecutive unplaced performances within a distance and class category can be eligible to drop back 1 grade.</td>
<td>Drop back grade; 3 consecutive unplaced performances within a distance and class category can be eligible to drop back 1 grade.</td>
<td>Drop back grade; 3 consecutive unplaced performances within a distance and class category can be eligible to drop back 1 grade.</td>
<td>Drop back grade; 3 consecutive unplaced performances within a distance and class category can be eligible to drop back 1 grade.</td>
<td>Put into races with greyhounds and similar times.</td>
<td>No specifics, they continue to drop in grade until they find their appropriate level.</td>
<td>Rating and handicapping system</td>
<td>2 consecutive unplaced performances within a distance and class category can be eligible to drop back 1 grade</td>
<td>Drop back in grade; 3 consecutive unplaced performances within a distance and grade category can be eligible to drop back 1 grade. Reverse order of choice non penalty heats into a full stakes penalty bearing final. Reverse order of choice Masters races for older greyhounds.</td>
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<tr>
<td>Any grade – potentially in twilight of career are dropping in grade and struggle to be competitive, but are drawn high due to historical career wins.</td>
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<td>Top grade – commonly third grade and above who cannot gain a start unless multiple other top grade greyhounds nominate at the same track and distance.</td>
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<td><strong>Distance</strong></td>
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<tr>
<td>Greyhounds competing in the distance category of 565m or above.</td>
<td>570m +</td>
<td>Middle distance 531m – 650m and distance 651m+.</td>
<td>Middle distance 561m -650m and distance 651m+.</td>
<td>Middle distance 400m- 599 and distance 600m+.</td>
<td>620 + (yards).</td>
<td>This can vary from track to track.</td>
<td>No reference to change in policy in regards to distance.</td>
<td>No reference to change in policy in regards to distance.</td>
<td>Middle distance 590m – 680m and distance 680m+.</td>
<td>Any race of 680 metres or more. Middle Distance is any race of 570 metres or more but less than 680 metres.</td>
</tr>
<tr>
<td>NSW greyhounds</td>
<td>Vic greyhounds</td>
<td>Qld greyhounds</td>
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<td><strong>Grading application</strong></td>
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<tr>
<td><strong>Maiden</strong></td>
<td>Various preferences given to greyhounds to order them for grading purposes. Always a couple of Maiden races drawn at every meeting.</td>
<td>Various preferences given to greyhounds to order them for grading purposes. Always a couple of Maiden races drawn at every meeting.</td>
<td>Various preferences given to greyhounds to order them for grading purposes. Always a couple of Maiden races drawn at every meeting.</td>
<td>Various preferences given to greyhounds to order them for grading purposes. Always a couple of Maiden races drawn at every meeting.</td>
<td>On time standards, must complete at least 2 trials.</td>
<td>On time standards, must complete at least 3 trials.</td>
<td>Nothing mentioned.</td>
<td>Open to all Maiden Horses in both Thoroughbreds and Harness.</td>
<td>Various preferences given to greyhounds to order them for grading purposes. Always a couple of Maiden races drawn at every meeting.</td>
<td>Maiden races are programmed once a month at each or the three tracks where possible. Maiden greyhounds are also permitted to race in Grade 5 events.</td>
</tr>
<tr>
<td><strong>Juvenile/Novice</strong></td>
<td>Rely on programming to filter appropriate races.</td>
<td>Novice from highest ranked grade 7 greyhounds.</td>
<td>Rely on programming to filter appropriate races.</td>
<td>Where possible have specified juvenile events.</td>
<td>Nil</td>
<td>Nil</td>
<td>Nil</td>
<td>Rely on programming to filter appropriate races.</td>
<td>Yes, have age restricted events for juveniles, also races for colts, geldings, mares &amp; fillies.</td>
<td>A juvenile race is considered every meeting if enough greyhounds eligible (Maidens must nominate) or programmed. No Novice Events.</td>
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<td>Where possible have specified Juvenile events based on the number of nominations.</td>
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<td><strong>Masters</strong></td>
<td>3 grades (M1/M2/M3) – 2 Masters wins to go up a grade and 2 Masters unplaced runs to go down a grade.</td>
<td>Masters Racing</td>
<td>Masters Racing</td>
<td>Nil</td>
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<td>Nil</td>
<td>Yes, have events for horses 5YO and above as an example.</td>
<td>A Masters Grade 5 race is considered every meeting if enough greyhounds eligible or programmed.</td>
<td>Free To All Masters programmed fortnightly rotating around the 3 Tasmanian tracks.</td>
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<tr>
<td>NSW greyhounds</td>
<td>Vic greyhounds</td>
<td>Qld greyhounds</td>
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<td><strong>Less-competitive</strong></td>
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<td>Maidens – drawn last if at all, relying on the club programming multiple events and hopeful of a reserve spot as a minimum.</td>
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<td>Any grade – a relatively high number of division wins or total wins means the greyhound is one of the first picked, equating to placement in the hardest division of an event.</td>
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<td>Top grade – often left out of a race due to lack of similar nominations; programming can attract like greyhounds together.</td>
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<td>For maidens they have a system at certain meetings that they be allocated a race by e.g. 4 unsuccessful nominations. For graded greyhounds have introduced grades 6 &amp; 7 to accommodate these greyhounds as well as introducing specific tier 3 meetings where nominations are encouraged for less competitive greyhounds. They also conduct events.</td>
<td>Maidens – drawn last if at all, relying on the club programming multiple events and hopeful of a reserve spot as a minimum.</td>
<td>Any grade – a relatively high number of division wins or total wins means the greyhound is one of the first picked, equating to placement in the hardest division of an event.</td>
<td>No specific details provided in regards to this, however the balance of the grading principles is based on states such as NSW, Vic &amp; Qld.</td>
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<td>Pathway Racing has been introduced to assist less competitive greyhounds.</td>
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<td>Times</td>
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<td>Use handicapping and rating system to grade horses in 'like for like' events</td>
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<td>Maidens drawn according to order of choice unless race conditions state otherwise. Are permitted to race in Grade 5 races so as to gain more opportunities. Any grade – Selected on Order of Choice or depending on race conditions. Greyhounds with a poor order of choice often miss selection. Non penalty Heats into a Penalty bearing Final programmed to cater for these less competitive greyhounds.</td>
<td>Invitation races including Grades 1, 2 &amp; 3 conducted to avoid top grade greyhounds being left out.</td>
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<td>Distance</td>
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<td></td>
<td>Will draw a distance race wherever possible, to the point of drawing a shorter field just to encourage these greyhounds and improve future events.</td>
<td>Will draw a distance race wherever possible, to the point of drawing a shorter field just to encourage these greyhounds and improve future events, but must have a minimum of 6.</td>
<td>Will draw a distance race wherever possible, to the point of drawing a shorter field just to encourage these greyhounds and improve future events.</td>
<td>Will draw a distance race wherever possible, to the point of drawing a shorter field just to encourage these greyhounds and improve future events.</td>
<td>Will draw a distance race wherever possible, to the point of drawing a shorter field just to encourage these greyhounds and improve future events, but must have a minimum of 6 for Middle Distance and 5 for a Distance event. Non Penalty events.</td>
<td>Will draw a distance race wherever possible, to the point of drawing a shorter field just to encourage these greyhounds and improve future events, but must have a minimum of 7. It is permissible for a race with less nominations to be scheduled if, after extending nominations it is required to provide 10 races at a meeting.</td>
<td>Will draw a distance race wherever possible, to the point of drawing a shorter field just to encourage these greyhounds and improve future events.</td>
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*Source: Prepared by GRNSW 2015.*
Appendix C  Joint Working Group members

Greyhound Racing NSW participants
Patrick Hallinan, Executive General Manager, Operations (Chairman)
Wayne Billett, Manager, Industry Reform
Dr Elizabeth Arnott, Chief Veterinary Officer
Max Carveth, Strategic Communications Manager

Stakeholder representatives
Mark Duclos, Sky Racing
Michael Eberand, Industry participant
Kat Ernst, Industry participant
Dr Ray Ferguson, Member Australian Veterinary Association – Greyhound specialist
Ryan Freedman, Industry participant
Douglas Freeman, Tabcorp
Dale Monteith, Consultant and former racing executive
Scott Parker, Greyhounds Australasia
Michael Phillips, Industry participant
Brenton Scott, Executive Officer GBOTA
Appendix D  Stakeholder consultation

D.1  Submissions in response to JWG discussion paper

D.1.1  Written submissions

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<tr>
<th>Name</th>
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<tr>
<td>Bob Whitelaw</td>
<td>Ray Ferguson</td>
<td>Bruce Knight</td>
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<tr>
<td>Jeff Holland</td>
<td>Chris Carl</td>
<td>Shoalhaven GRC</td>
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<tr>
<td>Joyce Alamango</td>
<td>John Gatty</td>
<td>Dr. Nathan Absalom</td>
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<tr>
<td>Joyce Alamango</td>
<td>Gary Smith</td>
<td>Kelley Covey Pty Ltd</td>
</tr>
<tr>
<td>Ross Davidson</td>
<td>Terry Marsh</td>
<td>Sandro Bechini</td>
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<tr>
<td>Chris van Veghel</td>
<td>Brooke Sweeney</td>
<td>Vicki Prest</td>
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<tr>
<td>Noeline Holloway</td>
<td>Kyle Maher</td>
<td>Unknown</td>
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<tr>
<td>Verna Tallon</td>
<td>Craig Townsend</td>
<td>NSW GBOTA</td>
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<tr>
<td>David Brewster</td>
<td>Colin Williams</td>
<td>Sue Absalom</td>
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<tr>
<td>Mark Donohue</td>
<td>Laurie Arnott</td>
<td>Richard Bligh</td>
</tr>
<tr>
<td>Bob Whitelaw</td>
<td>Steriline</td>
<td>Gary Brown</td>
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<tr>
<td>Rod Hampton</td>
<td>Gayle Masterton</td>
<td>Bruce Teague</td>
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<tr>
<td>Kevin Gordon</td>
<td>Carly Absalom</td>
<td>Shoalhaven GRC (2)</td>
</tr>
<tr>
<td>Simon Lyne</td>
<td>Chris Priestly</td>
<td>Michael Murphy</td>
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<tr>
<td>Roselyn &amp; Barry Evans</td>
<td>Ashley Dwyer</td>
<td>Peter Massa</td>
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D.1.2  Verbal submissions

<table>
<thead>
<tr>
<th>Name</th>
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<tbody>
<tr>
<td>Paul Wheeler</td>
<td>Pat Groizard</td>
<td>Jamie Saunders</td>
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D.1.3  Presentations to JWG representatives

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<th>Name</th>
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<tr>
<td>NSW GBOTA</td>
<td>Gary Brown &amp; Jeff Jaeger</td>
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<tr>
<td>Tamworth GRC</td>
<td>Cessnock GRC</td>
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<td>GRICG</td>
<td>Sandro Bechini – Participant</td>
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</table>
D.2 Submissions in response to draft JWG report

D.2.1 Written submissions

Paul Wheeler  
Robert Bray  
Bruce Knight  
NSW GBOTA  
Bob Glover  
Susan Absalom  
Joyce Alamango  
Vincent Cassar  
Bruce Knight  
John Tracey  
Matt Murphy  
Laurie Arnott  
Lori McKern  
Peter Brown  
Allan Proctor (verbal)

D.2.2 Summary of submissions

Breeding Quotas – life cycle of greyhounds
- Mixed reactions to breeding quotas and how the system would work. Concerns that quotas will be purchased by ‘animal liberationists’.
- Comments that this is a restriction of trade
- Clear definitions of professionals and hobby
- NSW major exporter of greyhounds- how does this affect the system?
- Still need a sunset clause to allow for ‘extreme circumstances’
- GAP issues and the re-homing of greyhounds that race interstate
- Quality of bitch – examples provided that not necessary the quality of a racing bitch is carried over into the breeding barn
- Acceptance of visual inspections for general health and hygiene, mixed reactions over the socialization component
- Widespread support for the tracking of life cycle of greyhounds
- Re-homing initiatives increased/improved
- Financing – trust fund held from prizemoney until greyhound completed racing and satisfactory placed
- Incentives to owners/trainers for successfully re-homing a greyhound
- Should there be incentives for participants that desex their greyhounds whilst racing, making it easier to re-home at the end of racing career?
- Training programs available to participants

Governance
- Separation of Regulatory and Commercial units with both served by a mutual CEO and staffing unit
- Support for a new racing Commissioner
- Support for a well-placed advisory group
Support for reduction in club board sizes and independent skill sets. This would be seen as a transition process.

Where independents are appointed to either GRNSW or club boards, this should be conducted via a recruitment company for transparency

Can we get a board to listen to the participants concerns?

Government should provide financial support for industry reform

Mixed response to GRNSW conducting racing

Reform process should provide definitive time lines

Centres of Excellence

Acceptance of the model/regions – each region to be treated on an individual basis. One size does not fit all.

Should still have a presence in Metropolitan Sydney? How is Metro determined?

Regional areas/facilities have long been neglected

Investment in appropriate track designs/facilities

Outlaw transition turns. Parklands in Queensland was rated as the best two-turn venue in the country until the clubs demise.

Clubs need to operate more than once a week. We cannot justify opening venues for 3 hours a week

Grading

Race programming needs to be a major consideration moving forward

Programming still requires a co-operation approach between GRNSW and clubs

Agreement review of Masters racing policy

Preferential box draws – trial period

Protection of limited winners against higher performed greyhounds

Wagering and Financial reward

Decrease taxation rate from take out to acceptable levels to encourage investment from high turnover punters

Mixed response to prizemoney levels. An agreed position was a minimum of $1000 winner

Less starters does not necessarily mean less turn over

D.3 Summary of regional tour feedback – January 2016

GRNSW Interim Chief Executive Mr. Paul Newson established the Joint Working Group (JWG) in November 2015 to investigate a range of options for reform for the greyhound industry. Mr. Newson provided the JWG with a Terms of Reference, which provided the platform for reform across a number of key areas of the greyhound industry.
JWG members met on four occasions and have provided the industry with two papers for consideration. The industry (and affiliates) have had the opportunity to provide written submissions on the work conducted by the JWG thus far.

To complement the JWG work, Manager of Industry reform Mr. Wayne Billett and GRSW grading colleague Mr. Nick Shurmer conducted a series of forums across regional NSW from the 4-8 January 2016. The forums were specific to the second paper issued by the JWG and the detail it contained.

The forums attracted strong numbers with over 200 attendees engaging in the process and providing their opinions and thoughts on the future direction of the industry. The regional forums were a direct initial target as in many of these areas there is either limited or no TAB racing opportunities. It was an important and considered approach to obtain feedback in these areas.

The forum’s approach was clearly articulated to all in attendance that reform across our industry needs to take place to meet the expectations of Community, Government and GRNSW moving forward.

Listed is a summary of feedback from each forum; however there was some disparity of opinions in zones from participants on the range of issues. Also listed are recommendations for the JWG to consider as part of the ongoing process of establishing a framework for industry reform:

D.3.1 Feedback on recommendations from forums

**Breeding quotas and life tracking of greyhounds:**

- Further detailed information is provided on the quotas system approach. Concern that this may be a restriction of trade and that considerations be given to NSW being an ‘exporter of greyhounds’ as well as protection for hobby breeders.
- That GRNSW implement an improved registration/licensing system which provides oversight across all stages of a greyhound’s life cycle.
- JWG recommends that GRNSW offer education programs to support/supplement any licensing/registration change.
- The JWG supports re-homing initiatives (GAP) with an enlarged footprint across the state. This footprint could include the expansion of the use of correctional centre’s (currently we use Dillwynia Correctional Centre) in regional areas. Recently the NSW Government announced a new correctional facility to be built at Grafton. Can the industry work with the government in establishing a facility within this new complex. There are also correctional facilities at Lithgow, Bathurst, Shoalhaven, Broken Hill, Tamworth, Wellington and Kempsey.
- The JWG supports re-homing initiatives with other potential organizations.
- JWG consider appropriate re-homing levy or scheme to be included in registration or racing process.
- JWG consider the effect that other states have the rule that where a greyhound is bred is responsible for the re-homing (unless owned by registered persons in that state) of that greyhound regardless of where its racing is conducted. Currently we adopt any greyhound.
- JWG recommends that the current registered owner is the person responsible for the greyhound at the end of racing career.
Governance Model

- JWG recommend that future GRNSW Board have appropriate industry representation and be structured to reflect both commercial and regulatory requirements.
- JWG recommend that if future industry boards are to have industry representation that a ‘voting’ system approach be applied.
- JWG recommend that the independent members of GRNSW board have appropriate skill sets (expertise) in defined areas i.e. welfare, finance, wagering, legal, marketing.
- JWG recommend that the Chair of GRNSW board be independent of industry and appointed by the Minister.
- JWG recommend that Greyhound Clubs boards/committee also have appropriate members (the number could vary here) with appropriate skills. This would be balanced by having board representation from the Volunteer base.
- JWG recommends that clubs have an open membership model.
- JWG recommends that current club constitutions align with modern expectations and community standards.
- JWG recommends that GRNSW instigate legislative change to have the power to run race clubs (racing) if required.
- Comment: GRNSW has recently undertaken an approach with clubs in regards to real and apprehended conflicts of interest for staff. This approach is to ascertain what levels and to manage any COI. If this approach has been adopted wouldn’t it be reasonable that GRNSW staff work under the same auspices?
- Comment: GRNSW currently provides funding (CITY & TAB) for race club managers and curators. Should GRNSW have greater input in to the appointment/training of these positions?
- Comment: are there too many layers of administration in our industry? What cost is this to the industry across all sectors?

Centres of Excellence

- JWG recommends that a level of TAB racing be conducted in the eight identified regions.
- JWG recognises that the COE approach would be a transitional process over ...identified years.
- JWG recognises that the tenure of Metro racing is uncertain beyond 2027 and GRNSW commence investigations for alternative sites/options.
- JWG recommends that GRNSW undertakes further analysis and costing of the COE concept.
- JWG recognises that not all regions COE will have the same blue print (opportunity) and that consideration be given to cover COE expectations may be across a number of venues in regions.
- JWG recommends that GRNSW work with Government/Councils to source potential opportunities for funding considerations.
- JWG that consideration be given that there are equal (where appropriate) number of both one turn and two turn race tracks.
- JWG recommends that GRNSW look at options for straight track racing with potential for 10 greyhounds.
• JWG recommends that the two hour paradigm for access to TAB racing be adopted where practical
• That COE have the optimum track facility/s available
• That COE be developed at industry owned/controlled venues where possible and practical.
• That Trial track locations are considered in conjunction with COE locations
• Comment: Can there be consolidation of clubs/venues is some areas?

**Grading**

• JWG recommends that the current grading policy be realigned to cater for the ‘protection’ of young greyhounds (i.e. number of wins), provision for greyhounds dropping in class and review masters policy to include ‘what happens when they get to M1 nowhere to race at all’ (as per recommendation 14)

• JWG recommendation number 15 be adopted:
  o develop specific objectives for race programming, to be applied by clubs in future programming decisions
  o if necessary, proactively influence club programming in the future to ensure the objectives

• Consistent Recommendations following forums:
  o Additional grades to protect young/juvenile greyhounds as well as greyhounds of less ability.
  o Masters revamp
  o Better programming
  o Guarding
  o underpinning grading policy changes can be achieved

**Wagering and financial reward-attract new participants**

• JWG recommends that reference is made that the current disparity of the Inter-Code Agreement funding arrangements and the cost to our industry and the potential impact it may provide the industry to invest in welfare, facilities etc.

• JWG recommends that prizemoney across the TAB racing platform is equalized

• JWG recommends a review if the benefits of Super Saturday (1 city meeting) prizemoney to the current system of two city meetings and also Group racing

• JWG recommends that GRNSW review the thoroughbred syndication model to encourage new participants

• JWG recommends that GRNSW pursue (new)options for alternative media rights i.e. streaming

• GRNSW review current race date allocation numbers and only provide what is affordable.

*Please note these recommendations run parallel to the JWG 2nd issues paper*
D.3.2 Wauchope forum

32 attendees, including club representatives from Wauchope and Taree.

Breeding quotas and life tracking of greyhounds:
- Didn’t fully digest the quota option; felt that more information was required to give a firm view.
- Fully supported the tracking of greyhounds’ life through the registration process. However didn’t want the registration process to be onerous and further financial burden on participants.

Governance Model
- Consensus on 7 members, 4 non industry and 3 industry through a voting system (i.e. Ozchase id number). Other option was that the 8 identified regions have a representative and have a regional board. Also agreement that industry representatives could be then selected from this group
- Supported GRNSW to run venues in conjunction with club Committees to keep that volunteer/local base and knowledge

Centres of Excellence
- Appreciated the fact that there region would/should be considered for TAB racing. If this is the model then the hub and spoke was the preferred option. Mixed reaction when asked if they received 1 TAB meeting per week, do we need the other venues in that region?
- Access to industry associated veterinarians that could provide not only race day but ancillary services.
- Better access to GAP program
- Felt it would be ideal to have both a one and two turn track racing in there region. The ‘spoke’ could also be used as a breaking in centre.
- Agreed with the two hour travel time

Grading
- Protection for young greyhounds
- Masters redraft – no racing for grade M1
- Guarding of greyhounds for participants with multiple starters
- Winning at TAB tracks then out-grading greyhounds when returning to Non-TAB
- Decreasing the number of fifth grade greyhounds that can range from 1 win to 40+ wins
- Better race programming (also access and communication of this)
- Go back to policy where it was maiden, 4 x 5th grades etc.
- Sick of talking about grading changes – let’s do it

Wagering and financial reward-attract new participants
- Rectify the Inter-code agreement (ICA)
- Tax parity – why are GRNSW not considering putting resources into regional areas to help lift the economic contribution to the state. Felt that this would provide greater benefits than currently exist
• Better lead up time on Sky to show the market fluctuations and pool sizes
• Continue Group racing, however reduction to be considered
• Agreed on the level prizemoney approach across all TAB racing (except City)
• Support the continuation of two city meetings provided they are on both one and two turn tracks. All City racing should be at Richmond (already industry owned) and develop this site as the pinnacle and then upgrade Regional venues to acceptable levels
• Appropriate syndication model to attract new participants
• Tap into new media opportunities i.e. streaming...keep our options open here
• Straight track racing with 10 greyhounds

Other
• Country Cup carnival should be reinstated
• Consideration for straight track racing
• Trial tracks consideration, how do they fit into the long term plan?
• If a greyhound is put down on track and is signed off, why do the owners then still have to fill paperwork out?

D.3.3 Tamworth
43 attendees, including club representatives from Tamworth, Armidale and Gunnedah

Breeding quotas and life tracking of greyhounds
• Participants felt that the new range of rules were introduced to ‘drive’ people out of the industry
• Happy to have the life cycle of greyhound tracked through registration process
• Breeding – numbers already heavily reduced in past months
• Even if the responsibility is designated to owners what happens if owner flatly refuses to take responsibility?

Governance Model
• Consensus that we should have representation on board. Number of board 5/7.
• Happy for Minister to appoint the Chairman
• Transparent approach to board appointments
• Clubs – no GRNSW control. For regions liked the approach of hub and spoke being conducted under a regional manager model
• How are clubs funded and to what level. Too much money in administration.
• Industry balance
• One body to run the industry
Centres of Excellence

- Appreciated the fact that the region would/should be considered for TAB racing. If this is the model then the hub and spoke was the preferred option. Mixed reaction when asked if they received 1 TAB meeting per week, do we need the other venues in that region?
- Access to industry associated veterinarians that could provide not only race day but ancillary services.
- Better access to GAP program
- Would be ideal to have both a one and two turn track racing in that region. The ‘spoke’ could also be used as a breaking in centre.
- Agreed with the two hour travel time
- Happy to race on Sundays to facilitate TAB racing
- 2 hour travel time acceptable
- Straight track racing opportunities

Grading

- Guarding
- Protection of your greyhounds coming through the grades
- Masters revamp
- No roll over from NON TAB – TAB in the nomination process
- Should NON TAB be drawn first?
- Better race programming

Wagering and financial reward-attract new participants

- Equal prizemoney across TAB racing, travel subsidy increase
- Inter code agreement
- Breeders incentive scheme, i.e. based on the BOBIS (Inglis) model
- Syndication
- School programs
- Asian wagering market which could incorporate streaming
- Streaming of products to corporate eg Victorian thoroughbred racing

Other

- Poor communication from GRNSW to participants. Heavily reliance on the internet and website (however like the chaser, could it be introduced monthly?). Should provide more information at clubs i.e. notice boards. Issues such as ‘cobalt’ that are important should have been advised in other communication channels. Also facilitate with clubs to have forms available.
- RSPCA attitude to greyhounds in regional NSW
- Better relationship with clubs and GRNSW
- Work hand in hand – GRNSW and participants
• Finish on lure trial – when and where?
• Access to GAP network
• Local RSPCA only holding greyhounds for one day and not the seven as per the Act.

D.3.4 Gunnedah
21 attendees, including club representative from Gunnedah

Breeding quotas and life tracking of greyhounds
• Acceptance that the tracking of greyhounds should be complimented by people being registered across all cycles of a greyhound’s life
• When participant’s license is due for renewal should GRNSW send a list of the current greyhounds in the care on the system as another audit process?

Governance Model
• Industry representation on Board with appropriate skill sets
• Minister appoint the Board Chairperson
• No GRNSW control of clubs

Centres of Excellence
• Fairfield as an alternative to Wentworth Park as a Metropolitan venue due to running costs at WP of $2.1M
• Access to industry Veterinarians
• TAB racing in the New England area would be well received
• 2 hours travel time frame acceptable

Grading
• Protect young greyhounds
• Guarding

Wagering and financial reward – attract new participants
• TAB prizemoney would be well received in their region

Other
• Would like to see GRNSW have a better coverage for non-TAB racing with stewards and compliance
• Regional trip supported and feel that GRNSW should get out more to these areas
• Dress regulations enforced at NON TAB meetings as well for presentation purposes
D.3.5 Coonabarabran

23 attendees, including club representatives from Coonamble, Moree and Coonabarabran.

Breeding quotas and life tracking of greyhounds
- Mostly give away greyhounds in their region
- Tracking of greyhounds life cycle important. Issues in rural NSW is access to GAP

Governance Model
- Concern if participant vote that the GBOTA would have too many members for a ‘block’ vote
- Industry should have some form of representation

Centres of Excellence
- Not feasible, too costly
- TAB racing would be beneficial to their region
- Do not change the current racing pattern of either Coonabarabran, Coonamble, Moree
- Coonabarabran and Coonamble complement each other
- Access to industry Veterinarians
- 2 hour travel time acceptable

Grading
- Grading policy should be step grading
- Drop back easier
- Mixed grades to be drawn i.e. 0-1 wins if nominations available

Wagering and financial reward – attract new participants
- Inter code agreement and tax parity need to be changed
- Country clubs run on the smell of an oily rag now
- Drop one group race and this funds our clubs (Coonabarabran) operations and prizemoney for the year
- Equalization of prizemoney not supported, felt that if we follow GRV approach racing in rural NSW will decline (this has happened in Vic)

Other
- Need further support from GRNSW. A firm commitment needs to be forthcoming to regional NSW in relation to continuing greyhound racing
D.3.6 Cowra

78 attendees, including club representatives from Cowra, Young, Temora, as well as participants from Wagga Wagga, Forbes, Orange and Bathurst.

Breeding quotas and life tracking of greyhounds

- Quotas hard to enforce and what are the finer details
- Consideration that NSW is an ‘exporter’ of greyhounds to other racing jurisdictions not only overseas but also nationally
- Acceptance of tracking for life cycle of greyhound
- Work with the grass roots people of our industry to facilitate this

Governance Model

- Need industry represented with appropriate skill sets
- Could the board balance be in favour of the industry? i.e. 3-4 not 4-3
- Independent Chair person
- Supported model for participants to have a vote on at least one person as representative

Centres of Excellence

- Both Non-TAB and TAB racing in their region
- Hub and Spoke
- Even suggestion that only two tracks with both TAB racing and non-TAB racing i.e. Wagga Wagga and Temora, other venues possible trial track
- Look at developing industry owned assets where possible or where there are long term lease in place with greyhounds having control of this venue
- Richmond should be the City venue, build a one turn track there to complement the existing track
- Straight track racing opportunities
- 1 ½ - 2 hour travel time acceptable
- There should be a transition period for this approach
- All participants should have reasonable access to both B,C,D meetings
- Feature events at Regional/TAB Clubs still important

Grading

- Allow programming for mixed grades i.e. 0-1
- If nominations extended those that nominate first should get first preference.
- Guarding. Regional participants at time have more than one greyhound nominated for City/Tab meetings and they can fall in the same race. This denies them the opportunity of winning more than the one race.
- Wentworth Park sprint policy is flawed. i.e. must have won over 400m before it can be drawn at WP, yet we ask for 280m greyhounds.
• Masters grading needs to be reviewed.
• Anomaly – greyhound winning maiden series i.e. heat and final is classified as one win and is not eligible for Wentworth Park racing, yet the same greyhound is not eligible for a 1 win race or series
• Prizemoney used to assist drawing fields
• Times used to assist drawing fields

**Wagering and financial reward – attract new participants**
• Inter-code agreement. GRNSW should challenge the existing agreement
• Mixed response to Super Saturday and one stand-alone City meeting.
• Equal prizemoney across all TAB venues
• Mixed response to Group racing...carnival approach with events
• Can we really afford the level of TAB racing that we provide. Contracted for 600 meetings, providing 900. What is the saving to the industry and what impact would this have?

**Other**
• Members of clubs (Committee) should be registered participants
• We have a human duty of care to consider as well with travel
• Maidens should be drawn in the first four races where appropriate
Appendix E Recommendations summary

Reduce ‘wastage’ by placing animal welfare at the centre

**Recommendation 1: Expand greyhound registration and monitoring to cover the entire lifecycle**
- Register and monitor greyhounds across lifecycle, including integrity and compliance officer assessment
- Introduce animal welfare and development performance measures across the lifecycle
- Collect, analyse and publicly report identified performance measures

**Recommendation 2: Expand licensing of greyhound handlers to cover the entire lifecycle**
- Introduce minimum standards including an educational qualification
- Introduce a single licensing process, with approval given for lifecycle stages
- Licensing tiers – hobbyists and professionals
- Make periodic licence renewal subject to appropriate greyhound outcomes

**Recommendation 3: Supporting the introduction of minimum standards**
- Consult with experts on standards
- Undertake education campaign to raise awareness of reforms
- Develop educational materials and training programs
- Expand public reporting related to regulation and licensing of handlers

**Recommendation 4: Introduce a state-wide breeding quota**
- Obtain legal advice on whether a quota is legally enforceable
- Identify a state-wide breeding quota and appropriate phase-in period
- Assess feasibility of options for quota, with separate allocations for ‘hobby breeders’ and ‘professional breeders’

**Recommendation 5: Expand greyhound re-homing in NSW**
- Identify best-practice in greyhound re-homing from approaches taken across Australia and internationally
- Identify options for financing re-homing
- Advocate for nationally consistent approach to greyhound adoption
- Increase efforts to enhance public perception of adoption, and to identify locations for re-homing program
- Expand access to Greyhounds as Pets

Centres of Excellence

**Recommendation 6: Undertake further specification and analysis of the Centre of Excellence concept**
- Identify optimum number of race meetings, and type, to be supported by track network
- Specify features and facilities of a Centre of Excellence, including how features should vary between Centre of Excellence tiers
- Identify the locations of Centre of Excellence Hub and Spoke tracks
- Undertake analysis to identify indicative costs of establishing and operating a Centre of Excellence facility
- Identify the financial and other resources potentially available to finance development and operation of Centres of Excellence

**Recommendation 7: Undertake further specification and analysis of the Centre of Excellence concept**
- GRNSW prepare a Metropolitan Racing Strategy

Regulatory and governance reform

**Recommendation 8: Introduce new organisational structure**
- Introduce organisational structure for GRNSW that maintains regulatory and commercial functions with more definite separation

**Recommendation 9: Implement a new board structure**
- Introduce a board structure that includes five independent and two independently selected industry representatives
- Implement a skills and qualification matrix for the GRNSW board which is used to select new members
- Only select board members with suitable qualifications
- Continue a focus on diversity in board selection arrangements

**Recommendation 10: Enhancements to transparency and accountability of GRNSW**
- Develop a reporting framework that addresses regulation throughout the lifecycle, and is used to report to government, the public and industry
- Publicly report on animal welfare including, injury, fatalities and injury related euthanasia
- Publicly report on progress against the strategic plan

**Recommendation 11: Appoint a greyhound racing Integrity Commissioner**

**Recommendation 12: Establish a new Advisory Committee to replace the GRICG**

**Recommendation 13: Reform minimum club board membership requirements**
- Revise minimum club board requirements, selection criteria and process, and member numbers

**Recommendation 14: Enhance club governance and reporting model**
- Enhance governance model, with clubs continuing as separate entities with a consistent constitution
- Enhance reporting by clubs to GRNSW
- GRNSW to play role in selection of club Boards and Managers
- Amend legislation to enable GRNSW to conduct race meetings

Using grading systems and race programming to improve animal welfare

**Recommendation 15: Amend the aims of the grading policy**
- Integrate masters guidelines
- Consider introduction of additional grades, so that younger and less experienced dogs, as well as less competitive dogs, are protected and compete against greyhounds of their own age and ability
- Undertake further analysis to determine eligibility requirements for the two recommended additional grades

**Recommendation 16: Targeted changes to grading policy**
- Develop specific objectives for race programming focussed upon animal welfare, to be applied by clubs in future programming decisions
- Proactively influence club programming to ensure the objectives underpinning grading policy changes can be achieved
- Examine the feasibility, financial implications and appropriateness of introducing preferential box draws and six starter races

Wagering and Financial Reward Landscape

**Recommendation 18: Targeted changes to prizemoney allocation**
- Undertake a review of prizemoney
- GRNSW consider application of a flatter prizemoney schedule, with minimum target of $1,000 paid for first place with fixed proportions for places
- Review the metropolitan prizemoney distribution model

**Recommendation 19: Undertake analysis to identify how best to improve race quality**
- Identify options for reducing track-related interference
- Identify actions to support increased distance racing
- Identify an optimum number and mix of races
- Identify the feasibility of introducing straight track racing, including for 10 starter races

**Recommendation 20: Develop a financial model to examine strategic issues**
- Undertake further analysis to determine appropriate greyhound outcomes for quota, with separate allocations for ‘hobby breeders’ and ‘professional breeders’