

8 April 2019

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Dear Mr Potter

Code of Practice for Keeping and Breeding Racing Greyhounds in the ACT 2018

Thank you for the opportunity to comment on the review of the *Code of Practice for Keeping and Breeding Racing Greyhounds in the ACT 2018*. We would like to express our strong support for the Code and its contents. The Code is a clear example of the ACT Government's commitment to animal welfare and makes the Territory a leader in greyhound welfare nationally.

We were pleased to see many positive features included in the Code when it was developed last year. These include the recognition of greyhounds as sentient beings, the focus on retirement, rehoming and the prevention of euthanasia of unwanted racing greyhounds and the banning of barking muzzles.

We do however have a number of comments to help strengthen certain features of the Code relating to enclosure sizes, preparation and re-homing requirements, and prerequisites to euthanasia.

We hope to see the ACT Government maintain and build on the strength of the Code to ensure the lives and welfare of greyhounds continue to be protected. We trust our submission will be of assistance and look forward to any further opportunities for input.

Yours sincerely,



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1. Housing and environment

The RSPCA recommends increasing the minimum enclosure size for singly housed greyhounds, for example a provision of 10m² for a singly housed greyhound. We also recommend providing a minimum enclosure size for group housed greyhounds in the Standards, such as “The minimum enclosure size for a single adult greyhound is 10m², with a minimum width of 1.5m. If greyhounds are housed in pairs, the minimum enclosure size is 20m², with a minimum width of 2m.”

We also question whether Part 3, which deals with housing and environment, is the appropriate location for requirements relating to exercise and behaviour set out in standards 3.4, 3.6, and 3.7. We recommend the review consider whether these standards would be better located in Part 4 dealing with exercise, socialisation and enrichment.

2. Preparation for retirement and re-homing

The RSPCA is strongly supportive of the inclusion of this Part in the Code, as it is an essential component of preventing the euthanasia of unwanted greyhounds. However, we feel that this Part requires greater clarity and information about the obligations for greyhound owners in preparing their greyhounds for re-homing to prevent euthanasia.

Standard 9.1 states that greyhound owners “must make all reasonable efforts” to rehome their greyhounds, whereas standard 9.2 relating to preparing a greyhound for re-homing states that greyhound owners are “responsible for taking all reasonable efforts”. We question whether the phrase “responsible for” gives rise to the same mandatory obligation generated by the words “must make”. For clarity and consistency, we recommend the words “is responsible for taking” within standard 9.2 be replaced with the words “must make”. We also recommend further clarity in standard 9.2 around what is meant by a “certified, suitably qualified, trainer.” We recommend the word “trainer” be replaced by “dog behaviour specialist” or similar.

We believe the seven-week program of preparation should be a mandatory requirement rather than simply outlined in the Additional Information section.

Information about the greyhound’s health and behaviour, and attempts to prepare the dog for re-homing is important regardless of whether the dog has completed a preparation program or not. Therefore the requirement to provide this information to the greyhound’s new owner set out in Standard 9.3 should still apply to the re-homing of dogs who have completed a preparation program. We would recommend deleting the words “If a greyhound is re-homed before completing a preparation program”.

3. Euthanasia and death of greyhounds

If the purpose of Part 9 of the Code is to better prepare greyhounds for re-homing so as to avoid euthanasia, Part 10 of the Code must be better integrated with the preparation and re-homing obligations. Specifically, the prerequisites for euthanasing a greyhound outlined in Part 10 must be linked to the requirements for preparation and re-homing in standards 9.1 and 9.2. This could be effected by adding the words “the registered owner has complied with their preparation and re-homing obligations set out in 9.1 and 9.2, and...” to the start of paragraph (c). We would also recommend consistency between the wording used to describe the certified and suitably qualified “trainer” in standard 9.2 and the suitably qualified and trained “assessor” in standard 10.1.C. In practice, this could be the same dog behaviour specialist.