

RSPCA Submission

Amendments to the Customs (Prohibited Exports) Regulations 1958 and Customs (Prohibited Imports) Regulations 1956 to prohibit the export and import of greyhounds for racing, breeding and commercial purposes.

15 August 2023

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Rural and Regional Affairs and Transport Legislation Committee
Parliament House,
Canberra ACT 2600
Via Email: rrat.sen@aph.gov.au

Dear Committee

RE: Amendments to the *Customs (Prohibited Exports) Regulations 1958 and Customs (Prohibited Imports) Regulations 1956* to prohibit the export and import of greyhounds for racing, breeding and commercial purposes.

The RSPCA greatly appreciates the opportunity to provide a submission on this important amendment. It is pleasing this Bill has been proposed given the many ongoing associated risks to the welfare of greyhounds. The RSPCA supports the intent of this Bill. Australia is one of only seven countries which has a commercial greyhound racing industry. The others are New Zealand, Mexico, Ireland, United Kingdom, the United States (five states only) and Vietnam. However, it is also believed that more than 20 countries (mainly in Europe) host greyhound racing which is not governed by laws relating to gambling and racing.

Greyhounds bred and used in the racing industry experience many negative impacts during their life and up until recently, many were discarded as 'wastage' once they were deemed no longer useful. Transportation poses many stressors on animals and should only be undertaken when absolutely necessary. The RSPCA believes that importing greyhounds for racing and breeding is not justified due to associated negative animal welfare impacts.

Today, many greyhounds are a special member of countless families across Australia, largely due to the commitment and efforts of many volunteers who work tirelessly to rehome greyhounds exiting the racing or breeding industry. As such, the status of greyhounds in our community has risen significantly from being viewed as only being a part of a racing industry to now being a beloved pet. Protecting their welfare is paramount and this Bill is an important step in achieving this.

For further information, please contact me at devans@rspca.org.au

Sincerely



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Recommendations

Recommendation 1: The Australian Government must provide independent oversight of the export of greyhounds.

Recommendation 2: If the export of greyhounds for racing, breeding or commercial purposes is permitted to continue then the requirement for such a greyhound to have a passport for export must be legislated and enforced.

Recommendation 3: Australian law should prohibit the export of greyhounds for racing, breeding or commercial purposes.

Recommendation 4: In the interim, Greyhounds Australasia should be required to report on, and publish, information about the number of passports it issues, the value of each greyhound exported, and destination countries.

Recommendation 5: That an investigation be undertaken to ensure that greyhounds being exported as ‘support’ animals is conducted in a manner that safeguards their health and welfare including that they have been assessed as suitable for this role, received appropriate training and that relevant records on their health, welfare and fate are publicly available.

Recommendation 6: The Australian Government should prohibit the import of greyhounds for racing, breeding or commercial purposes, unless the greyhound racing industry resolves key animal welfare issues.

Recommendation 7: The Australian Government should prohibit the importation of genetic material for artificial breeding in greyhounds, unless the greyhound racing industry resolves key animal welfare issues and surgical insemination is prohibited.

Introduction

The RSPCA is pleased that amendments are proposed to the *Customs (Prohibited Exports) Regulations 1958* and *Customs (Prohibited Imports) Regulations 1956* to prohibit the export and import of greyhounds for racing, breeding and commercial purposes, and welcomes the opportunity to provide comments.

In addition to the export of greyhounds, the RSPCA has identified many animal welfare issues associated with greyhound racing including:

- Over breeding and oversupply of greyhounds
- High rate of injuries
- Inadequate socialisation and environmental enrichment
- Administration of banned substances
- Training methods including live baiting
- Lack of mandatory and enforceable animal welfare standards for greyhounds

- Inadequate regulation and enforceable standards
- Lack of industry transparency and accountability

Until all these problems are recognised and effectively resolved, the RSPCA does not support greyhound racing. For more information, see Appendix 1: RSPCA Policy on Greyhound Racing.

The proposed Bill seeks to prohibit the export and import of live greyhounds and reproductive material. The following information provides evidence to support the intention of this Bill.

Companion greyhounds

There are concerns that the proposed amendments will place an unreasonable onus on owners of companion greyhounds who wish their greyhounds to leave or enter Australia by having to seek Ministerial approval. The RSPCA believes that owners of companion greyhounds who wish to travel internationally, should be treated the same as owners of all companion dogs. However, if the Ministerial approval requirement was removed, there would need to be procedures in place to prevent unscrupulous operators using this avenue to transfer greyhounds for racing, breeding or commercial purposes. Greyhounds should only be exported as a companion animal, as is the case for other family pets.

Export of greyhounds for racing, breeding or commercial purposes

Transporting any animal internationally poses significant animal welfare risks including stress, dehydration, fear and anxiety. Therefore, export to other countries should not be undertaken unless absolutely necessary.

No independent oversight

There is no independent regulatory oversight of exported greyhounds to other countries in terms of their treatment or fate, including if they are further exported to other countries.

Prior to 2013, approximately 300 greyhounds were exported each year from Australia to Macau (Greyhounds Australasia, 2014). Greyhounds could not be kept as pets in Macau and all imported Australian greyhounds went to the Canidrome greyhound track (Greyhounds Australasia, 2014). The Canidrome was the only greyhound track in Asia and was notorious for poor animal welfare standards and high death rates (England, 2012). In addition, approximately 20 greyhounds were exported each year from Australia to China (Greyhounds Australasia, 2014). At least some of the greyhounds exported to China were sent to the Shanghai Wild Animal Park, where dogs were kept in poor conditions and forced to race African cheetahs for public entertainment (Duff, 2017).

In May 2014, Greyhounds Australasia (is the national greyhound racing body comprising of representatives of jurisdictional greyhound racing authorities in Australia and New Zealand

to support and promote greyhound racing) released a review of Australian greyhound export welfare standards (Greyhounds Australasia, 2014). The Review concluded that Macau was not compliant with Greyhounds Australasia export standards. Management of the Canidrome greyhound track in Macau estimated that almost 50% of their racing greyhounds were euthanased each year (Greyhounds Australasia, 2014). Greyhounds Australasia suspended receipt and processing of passport applications to Macau in March 2013 (Greyhounds Australasia, 2014). The Review also noted that China was an unregulated jurisdiction whose compliance was difficult for Greyhounds Australasia to assess, and that passports were unlikely to be issued for export to this jurisdiction (Greyhounds Australasia, 2014).

In December 2015, the ABC 7.30 Report aired a program revealing that, despite the decision of Greyhounds Australasia to ban export greyhounds to Macau in 2013, greyhounds continued to be exported from Australia to Macau (Meldrum-Hanna, 2015). Between 2013 and 2015, 941 greyhounds, were exported to Macau, China or Hong Kong (Knaus, 2018).

In September 2017, Greyhounds Australasia suspended passports allowing greyhounds to be exported to the United States amid concerns that dogs were making their way from the United States to China or Macau (AAP, 2017). In addition, a number of jurisdictions (Victoria, NSW, WA, QLD) introduced new rules making it an offence for participants to transfer greyhounds to another person when they know or ought to know that the greyhound will be exported without a greyhound passport (GRV, 2019; GWIC, 2018: RWWA, 2008; Racing Qld 2017).

Since 2015, there have been several instances of greyhound industry participants exporting greyhounds to Macau and China. In 2017, GRNSW disqualified two greyhound owners who had profited \$50,000 from exporting 166 greyhounds to Shanghai and Macau (11). The two owners exported 96 dogs to Macau and 70 dogs to Shanghai between 2013 and 2015 (Knaus, 2017). In April 2018, a NSW greyhound breeder was disqualified for 12 months for exporting 10 dogs to China without documentation and in May 2018, a greyhound trainer was charged with exporting 120 dogs to China and Macau (AAP, 2018).

The Macau Canidrome closed in July 2018 but failed to rehome 533 dogs remaining in its kennels, 481 of whom were still in the facility being cared for by the Anima-Society for the Protection of Animals, Macau as of November 2018 (Blennerhassett, 2018: Commonwealth of Aust 2019); the last of the dogs were rehomed in June 2019 (Macau Daily Times, 2019). The dogs were re-homed by 39 organisations from around the world including Hong Kong, Macau, Italy, the United Kingdom, the United States, Germany, France and others, including seven organisations in Australia (Commonwealth of Australia, 2019; Macau Daily Times, 2019; Forever Hounds Trust 2019). The dogs rehomed included 497 Australian greyhounds (Commonwealth of Australia, 2019).

Due to the lack of independent ongoing oversight, the horrific incidences involving Australian greyhounds relating to the Macau Canidrome can still occur today in overseas locations. There are no legal provisions to prevent this from recurring except to prohibit the export of Australian greyhounds to any country. There is a collective responsibility to do better for Australian greyhounds.

Recommendation 1: The Australian Government must provide independent oversight of the export of greyhounds.

Failure of the Greyhounds Australasia passport system

The passport system introduced by Greyhounds Australasia to prevent greyhounds from being exported to countries deemed to have lower animal welfare standards is not mandatory under law.

Greyhounds Australasia Rules require any person intending to export a racing greyhound to obtain a greyhound passport and certified pedigree issued by Greyhounds Australasia (GAR124) (Greyhounds Australia, 2021). Greyhounds Australasia policy mandates that passports will not be issued to greyhounds where the intended destination is unregulated (Greyhounds Australasia, 2018). However, there is no federal law prohibiting export of greyhounds without a passport and the lack of a passport does not preclude a greyhound from being exported (GRNSW 2019). This means that it is currently not possible to enforce the requirement for a racing greyhound to have Greyhounds Australasia issued passport for export.

Recommendation 2: If the export of greyhounds for racing, breeding or commercial purposes is permitted to continue then the requirement for such a greyhound to have a passport for export must be legislated and enforced.

Greyhounds Australasia does not publicly release information about the number of passports it issues and for which countries.

This demonstrates that members of the industry are not selective in terms of where their greyhounds are exported to and that they are not compliant with their own industry requirements. Furthermore, the penalties for these offences appear to be insufficient to act as a deterrent. For example, one industry participant found guilty of misconduct in facilitating the export of a greyhound without appropriate documentation was fined only \$1000 (GRNSW, 2019).

Unfortunately, it appears that breaches of the passport system are only discovered after greyhounds have been exported, which leads to uncertainty and concerns regarding their care and treatment. One would assume that the passport system is not used by unscrupulous operators on the basis the end destination would not be acceptable under the system.

Unless a country has high animal welfare standards, annual independent audits are conducted on the treatment and condition of each exported greyhound and a 'no export' policy, then the health, welfare and fate of Australian greyhounds cannot be safeguarded. Hence, the only solution is to prohibit racing Australian greyhounds being exported.

Recommendation 3: Australian law should prohibit the export of greyhounds for racing, breeding or commercial purposes.

Recommendation 4: In the interim, Greyhounds Australasia should be required to report on, and publish, information about the number of passports it issues, the value of each greyhound exported, and destination countries.

Animal welfare standards of destination country

Despite other countries having similar welfare standards to Australia, this is not sufficient assurance that the welfare of exported greyhounds will be safeguarded. For example, New Zealand may be considered to have equivalent animal welfare standards to Australia ([World Animal Protection Index](#)) but due to serious and inherent animal welfare risks, the future of the greyhound racing industry is currently under question (Hansen, 2017).

Similarly, the UK has comparatively high animal welfare standards and yet the 2016 Greyhound Welfare Report (DEFRA 2016) highlighted many issues which the industry had not addressed including transparency regarding lack of publication of data relating to injuries, euthanasia and rehoming rates and a need for robust kennelling standards etc.

Export of greyhounds for non-commercial purposes

There has been an increase in the number of greyhounds exported to the USA under an adoption program arranged by GRNSW where dogs are placed with owners to assist with reducing anxiety and depression (see [‘Ethical conundrum’: sending retired Australian greyhounds to US rescues some – but at what cost? | Greyhound racing | The Guardian](#))

It is unclear as to how this program operates in terms of who receives the dogs upon arrival, how are they selected/allocated and who monitors their care and treatment as well as their fate. There are concerns that without a robust monitoring system, some of these dogs could be further transferred to other owners thereby creating a situation that their further care and fate is not safeguarded.

Recommendation 5: That an investigation be undertaken to ensure that greyhounds being exported as ‘support’ animals is conducted in a manner that safeguards their health and welfare including that they have been assessed as suitable for this role, received appropriate training and that relevant records on their health, welfare and fate are publicly available.

Import of greyhounds for racing, breeding or commercial purposes

Based on the RSPCA policies C6.1 and C6.2, the RSPCA does not support greyhound racing until all key animal welfare issues are resolved. On this basis, it is incongruous to permit more greyhounds to enter Australia to be exposed to these significant animal welfare risks.

Furthermore, there are significant risks associated with transportation of greyhounds from overseas.

The transport risks include;

- Handling by unfamiliar people
- Unfamiliar environment including excessive noise, temperature extremes
- Motion sickness
- Extended confinement
- No access to food or water for an extended period which can lead to dehydration
- No access to 'toilet' in safe and familiar place

These risks can cause stress, fear, anxiety and discomfort. Importing greyhounds for commercial purposes would not be deemed to be in their best interests.

Furthermore, there is no central repository of the number of imported greyhounds and due to the saturation of the adopted homes for greyhounds leaving the industry, it would seem incongruous to allow more greyhounds to be imported. The greyhound industry is not addressing the issue of excess breeding which continues to be a major welfare issue particularly in relation to over supply compounding the difficulty in finding homes for greyhounds exiting the industry.

Recommendation 6: The Australian Government should prohibit the import of greyhounds for racing, breeding or commercial purposes, unless the greyhound racing industry resolves key animal welfare issues.

Import of genetic material for commercial purposes

Utilising genetic material (whether imported or obtained domestically) requires artificial breeding procedures. It is reported that 80% of greyhound breeding in NSW is done using surgical artificial insemination (Pollard-Williams, 2022). This procedure poses many animal welfare risks including pain and suffering and is not considered necessary by many veterinarians as there is a safer and more humane alternative technique which can be used.

Surgical artificial insemination (SAI) is a highly invasive procedure involving general anaesthesia and abdominal surgery where semen is injected directly into the uterus, with or without post-operative pain relief (the use of pain relief is controversial due to the unknown effect on fertility). The use of SAI is ethically questionable given that transcervical artificial insemination (TAI) which does not require general anaesthetic, no incisions and is a very quick procedure which can be repeated with minimal risk to the bitch is a more humane alternative.

Manual restraint is generally sufficient for the TCI procedure which usually takes less than 10 minutes. TCI can be a technically challenging procedure so is best carried out by a suitably qualified and competent veterinarian with sedation and analgesia as required. Pregnancy rates for TCI are superior to those associated with SAI and complications for SAI are significantly higher compared to TCI (Mason & Rous, 2014). There are no valid

commercial constraints or economic reasons why SAI should be performed given that TCI has been proven to be effective and humane (Mason & Rous, 2014; Gunn et al 2021).

Until surgical artificial insemination is prohibited across Australia, the RSPCA supports a prohibition on the importation of genetic material for artificial breeding in greyhounds. SAI was banned in the UK in 2019 with Norway, Sweden and the Netherlands also imposing a ban.

Currently, there is no evidence to indicate that the current Australian population of racing and breeding greyhounds is under threat in terms of genetic diversity due to inherited conditions which pose animal welfare risks. However, if the industry can demonstrate in the future that there is a need to import genetic material to resolve inherited disorders which compromise animal welfare, then the importation of genetic material should be reviewed (assuming that the proposed prohibition is implemented).

Recommendation 7: The Australian Government should prohibit the importation of genetic material for artificial breeding in greyhounds, unless the greyhound racing industry resolves key animal welfare issues and surgical insemination is prohibited.

Export of genetic material for commercial purposes

Although the export of genetic material negates the need for transporting a live greyhound internationally, it is not possible to monitor nor ensure the care and welfare of any progeny derived from the exported genetic material in the destination country. Furthermore, as there is no independent oversight, it is not possible to ensure that the progeny of Australian greyhounds derived from exported genetic material are not exported to other countries.

In addition, given that surgical artificial insemination is not banned in most countries, bitches being inseminated with exported genetic material from Australian greyhounds may be subjected to surgical artificial insemination, which poses unnecessary animal welfare risks.

The RSPCA supports a prohibition on the export of genetic material for commercial purposes.

Recommendation 7: The Australian Government should prohibit the export of genetic material for commercial purposes.

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APPENDIX 1: RSPCA Policy on greyhound racing

The [RSPCA's policy on greyhound racing](#) is as follows:

RSPCA Policy C06 Greyhound Racing

6.1	RSPCA Australia considers that there are significant and entrenched animal welfare problems inherent in the greyhound racing industry. These include problems with over-supply, injuries, physical overexertion, inadequate housing, lack of socialisation and environmental enrichment, training, illegal live baiting, administration of banned or unregistered substances, export and the fate of unwanted greyhounds (high wastage and high euthanasia rates).
6.2	Until all of these problems are recognised and effectively resolved, RSPCA Australia does not support greyhound racing.
6.3	<p>Where greyhound racing continues to be conducted, RSPCA Australia advocates the following:</p> <ul style="list-style-type: none">• The comprehensive regulation of greyhound racing by an independent body with a formal and complete separation of the integrity and regulatory functions from the commercial functions.• The adoption of compulsory and enforced animal welfare standards for greyhounds at all life stages to eliminate practices that cause injury, pain, suffering or distress and ensure all greyhounds have a good quality of life.• The adoption of formal processes to address over-supply and wastage rates. There should be an expectation and formal processes in place within the industry that greyhounds will be rehomed as a companion animal on retirement and provisions made to ensure their welfare.• The mandatory collection and publication of comprehensive lifecycle (birth to death records) and injury statistics and the development of a national identification and traceability system for all greyhounds to ensure each greyhound born is accounted for. <p>See also RSPCA Policy F4 Export of live animals for purposes other than slaughter</p>
6.4	Hurdle races RSPCA Australia is opposed to hurdle races for greyhounds because of the high risk of injury associated with this activity.
6.5	Live Baiting
6.5.1	RSPCA Australia is opposed to the use of live animals or animal carcasses or any part of an animal as a bait or lure for the purpose of training, baiting and blooding of greyhounds or other racing dogs. Only non-animal devices and products should be used for training purposes.
6.5.2	RSPCA Australia supports legislation that effectively prevents the use of live animals or any part of an animal as bait or a lure. Legislation to prevent live baiting or the use of animal material must be rigorously enforced.

6.6	Devices and Equipment Any device or equipment used to control or modify behaviour or performance in greyhound racing or associated training must be humane and must not cause injury, pain, suffering or distress to the animal. See also <u>RSPCA policy A7.4 and A7.5</u>
6.7	Blood collection
6.7.1	Ex-racing greyhounds destined for euthanasia are regularly used as a source of blood for veterinary transfusions and other purposes. This practice has arisen due to the demand for blood and high numbers of unwanted greyhounds.
6.7.2	Blood collection must not be regarded as a justification for the euthanasia of greyhounds. To reduce euthanasia rates of greyhounds, the underlying causes of greyhound wastage must be addressed.
6.7.3	RSPCA Australia supports the expansion of alternative blood collection (that does not involve euthanasia) such as the collection of blood from suitable, healthy owned 'donor' dogs under close supervision and at appropriate intervals to ensure the welfare of the dogs.