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Dear Mr Alegria

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

Thank you for the opportunity to comment on the *Code of Practice for Keeping and Breeding Racing Greyhounds in the ACT 2018*. Our enclosed submission is made on behalf of RSPCA Australia and draws on our extensive experience in greyhound welfare reforms throughout the country. This submission is complementary to RSPCA ACT's submission on this Code.

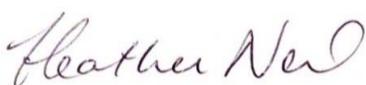
We are pleased to see many positive features proposed in the Code. These include the recognition of greyhounds as sentient beings, the focus on retirement, rehoming and the prevention of euthanasia of unwanted racing greyhounds and the banning of barking muzzles.

We do however hold serious concerns about certain features of the Code, particularly how the risks to animal welfare involved in the export of greyhounds from Australia are not mentioned, the lack of information about behavioural assessments and the approved trainers who will be involved in this process, as well as the undefined use of the term 'minimum' in the Standards section of Chapters 3 and 4.

Importantly, these and other issues identified in the Code can be rectified with relatively simple amendments, which our submission covers in detail.

We trust our submission will be of assistance to the Transition Taskforce in its deliberations and we are thankful of the opportunity to provide this feedback.

Yours sincerely,



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General comments

On Page 2 of the document, in the Contents chapter, there is reference to a section titled 'Greyhounds intended for export' which does not appear in the text of the document. RSPCA Australia does not support the export of greyhounds from Australia because of the significant risks for poor animal welfare outcomes. A lack of formal tracking system for dogs exported to other countries means the fate of Australian greyhounds is currently unknown.

As the overall objective of the Code of Practice for Keeping and Breeding Racing Greyhounds in the ACT 2018 is to ensure that "racing greyhounds that are kept in the ACT are provided with care that maximises their long term health and well-being; and protected from pain, distress, danger, illness and injury", RSPCA Australia believes the Code should not allow for the export of greyhounds from the ACT.

RSPCA Australia believes it would be prudent to develop an information sheet or simple summary for greyhound trainers which outlines their legal obligations, to encourage compliance with the Code.

Introduction

RSPCA Australia is supportive of the inclusion of the statement "any greyhound in the ACT that is over the age of six months is presumed to be a racing greyhound, unless the registered owner of the greyhound declares to the Registrar of Domestic Animals that the greyhound will not be involved in racing", however we think it is important this statement is supported by an education and public awareness campaign to ensure unwitting dog owners are not caught out by this new requirement.

Suggest including 'are' before "...protected from pain, distress, danger"

It is positive to see the recognition of animals as sentient beings in this Code, as it establishes the basis for the duty of care towards animals undertaken by carers.

Legal obligations specific to racing greyhounds in the ACT

RSPCA Australia notes the requirement to "notify the Registrar of Domestic Animals the details of any greyhound litters within seven days of their birth". This is an important factor in securing the welfare of very young greyhounds, however it could be difficult to regulate. We suggest requesting additional information when registering racing greyhounds at 6 months of age to include details of the greyhound's parentage, allowing trace back of litters.

It is not clear if the holder of a 'racing greyhound controller licence' is different from a 'keeper of racing greyhounds' or a 'registered keeper'. If there is a difference, this should be further defined and clarified. If not, consideration should be given to the consolidation of these two terms.

1. Nutrition

Suggest change Standard 2 which states "Food must be canine appropriate and of sufficient quantity and quality to meet the daily requirements for the condition, age and size of the greyhound" to 'Food must be a scientifically validated and nutritionally complete diet in a quantity which results in ideal body condition for the age and size of the greyhound'.

2. Health management

RSPCA Australia commends the stringent health requirements outlined in this chapter, including the need for worming and flea preventatives to be “safe and proven effective”. However we strongly recommend moving the following line “Dogs with clinical dental disease as diagnosed by a veterinary surgeon during a general health check should receive dental treatment as directed by the veterinary surgeon” in the Additional Information to the Standards to ensure it is compulsory.

This is because dental disease is painful and detrimental to the long term health and welfare of greyhounds. Additionally, it might be seen as a breach of the primary legislation, the AW Act which states “A person in charge of an animal commits an offence if the person fails to take reasonable steps to provide the animal with appropriate... treatment for illness, disease, and injury”.

3. Housing and environment

RSPCA Australia 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.”

The statement in Point 3 of the ‘Space Requirements’ that “...it must have sufficient time and space outside this enclosure” requires further clarification. Although extra detail is provided in the ‘Additional information’ section, as this section is not mandatory, it is important to either define or clarify the word ‘sufficient’ to ensure greyhounds receive appropriate amounts of time outside of their kennels each day.

RSPCA Australia feels it is important to include requirements for bedding in the standards. Suggest rephrasing Point 9 to “Sleeping areas must include a raised bed or wooden pallet so that the dog is not forced to sleep on concrete or the ground. Bedding material in sufficient volumes should be provided to ensure thermal and musculoskeletal comfort.”

In Point 17, we suggest after “...must be housed” to include ‘apart from other adult greyhounds’.

The statement in Additional information which reads “Pens and kennels should be cleaned out at least once per day, or more often as required, by hosing or other appropriate means” is strongly recommended to be moved into the Standards section, as keeping kennels clean is a minimum requirement and important for the ongoing health of greyhounds.

In Additional information before “...disease or internal parasite infection” suggest adding ‘and’.

The inclusion of a reference to “...the establishment’s health management plan” in the Additional information section is confusing, as this is the first reference to this document in the plan and no further detail is provided on the document in the plan. Suggest removing reference if this is not a mandatory requirement.

4. Exercise, socialisation and enrichment

The use of the term “minimum amount” in the Standards when describing exercise, socialisation and enrichment requirements is not appropriate, as it is too ambiguous and would facilitate substandard provision of these requirements. We suggest changing the wording of this Standard to along the lines of “Greyhounds must be provided with sufficient daily exercise, socialisation and enrichment to provide optimal physical and mental health”, or alternatively provide minimum levels of each requirement in descriptive terms, for example “30 minutes of exercise daily”.

5. Breeding

Suggest inserting 'second-degree relationships such as' after "...mother-son, brother-sister or" to appropriately describe grandfather-granddaughter relationships.

Suggest changing "time" to 'times' after "...service more than 14" in the Additional information section.

Suggest changing "15m2" to '15m²' after "...should be no less than" in the Additional information section.

Suggest changing "32oC" to '32°C' after "...an ambient temperature of" in the Additional information section.

6. Education and training

RSPCA Australia commends the effective banning of barking muzzles. These muzzles are cruel and prohibit an animal from drinking and panting, as well as frustrating a natural urge (e.g. barking) without solving the underlying cause (e.g. inadequate enrichment).

Suggest changing "pre-education" in the Additional information section to 'pre-training' to provide consistent terminology in this chapter.

7. Transport

As mentioned in the General Comments segment of this submission, RSPCA Australia objects to the export of greyhounds from Australia for purposes other than to be kept as a pet. Suggest adding a line in the Additional information section which states 'The export of greyhounds to countries with poor or non-existent animal welfare laws should not occur' after "...relating to the export of greyhounds."

8. Temporary suspension of participation in racing

No additional comments on this chapter.

9. Preparation for retirement and re-homing

RSPCA Australia is strongly supportive of the inclusion of this chapter in the Code, as it is an essential component of preventing the euthanasia of unwanted greyhounds. However, RSPCA Australia feels that this chapter requires more information and guidance to greyhound owners to prevent the euthanasia of unwanted greyhounds.

Firstly, the statement in the Standards that a seven-week preparation program must be undertaken "...unless a behavioural assessment by a trainer approved by the Register [sic] of Domestic Animals advises otherwise" requires clarification. What does the behavioural assessment contain? How do approved trainers receive their accreditation? Who will be these approved trainers and how will they be delivering these behavioural assessments? It is vitally important to get any behavioural assessment process correct, as dogs entering RSPCA shelters in Australia are euthanased for behavioural reasons more often than any other¹. This process requires significant consideration prior to implementation, and we strongly recommend TCCS works closely with RSPCA ACT in this area, as RSPCA ACT have extensive experience behaviourally assessing dogs prior to adoption.

Additionally, RSPCA Australia would like more information on the process which leads to the "health and temperament of the greyhound have been assessed as suitable for rehoming". Is a veterinarian undertaking the health assessment prior to rehoming? Does a veterinarian prepare a "health and management statement" as outlined in the Standards? If so, this requires detailing.

Suggest changing "Register" to 'Registrar' after "...approved by the" in the Standards.

Suggest inserting “the” after “...rehomed to a suitable home - where” in the Standards.

10. Euthanasia and death of greyhounds

Suggest removing “seek” after “...for that greyhound must” in the Standards.

RSPCA Australia strongly recommends moving the sentences in the Additional information section which read “Euthanasia should only be performed on the advice of a veterinary surgeon, and only when the greyhound’s pain, distress or suffering is likely to exceed management levels, or when the health or welfare of the greyhound is irredeemably compromised” to the Standards. If this phrase remains in the Additional information section there is no mandatory standards around *when* euthanasia should be performed, which fails to support the intentions of Chapter 9 - Preparation of retirement and re-homing or the stated objective of the Code on page 3 which is to prevent the euthanasia of unwanted racing greyhounds.

Dictionary

Suggest deleting “that” after “...of this Code, a greyhound” in the definition of Greyhound.

Suggest changing “design” to ‘designed’ after “...a structure” in the definition of Kennel.

Suggest including “Also known as a pen” after “...house greyhounds or puppies” in the definition of Kennel. Suggest deleting the definition of Pen, as the two are interchangeable.

Suggest changing the definition of Socialisation from “Interaction between an individual greyhound and other animals (including greyhounds) and humans with the objective of making the individual greyhound fit for a life in companionship with others” to “Preparing a greyhound to enjoy and be comfortable with other animals, people, places and activities. Socialisation should start during the sensitive period between 3 and 17 weeks of age, and continue to be reinforced throughout life.” This definition provides a more accurate and useful description of the socialisation process.

References

1. RSPCA Annual Statistics 2016-2017, <https://www.rspca.org.au/facts/annual-statistics-2016-17>