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REVIEW OF AUSTRALIAN GREYHOUND EXPORT WELFARE STANDARDS

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29 May 2014

Mr Russell Ware
Chairman
Greyhounds Australasia Limited
Sandown Greyhound Racing Complex
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Springvale VIC 3171

Dear Mr Ware,

The Board of Greyhounds Australasia Limited (GA) has asked its Chief Executive Officer (CEO) to undertake a detailed review of welfare standards in host countries where Australian greyhounds are commonly exported to. The Board requested that, as part of this review, required standards would be developed for compliance by jurisdictions seeking to import Australian greyhounds.

The health and wellbeing of Australia's greyhounds remains GA's number one priority. This report aims to benchmark the minimum standards required of host countries in order to support the export of Australian greyhounds to these jurisdictions, while also providing a platform to undertake periodic compliance audits against these standards.

The successful completion of this review has been greatly assisted by the expert advice and informed contributions made by Dr Ray Ferguson, Secretary of Australian Greyhound Veterinarians, officials from the Commonwealth Department of Agriculture and a number of Australian greyhound exporters. Valuable support was also received by members of both GA and its Welfare Committee (GAWC).

The findings of this review demonstrates the industry's commitment to ensuring export welfare standards are met while providing a pathway to improved export welfare outcomes through tighter arrangements between industry and governments.

Please find herein the outcomes and recommendations of GA's review into Australian greyhound export welfare standards for consideration by the GA Board.

Yours sincerely,

Scott Parker
Chief Executive Officer

Executive Summary

In May 2012, the CEO of GA commenced the Board approved review into the animal welfare standards of host countries importing Australian greyhounds. The motivation for the conduct of the review arose from reports that greyhound welfare standards in foreign export jurisdictions may not be acceptable to the Australian greyhound racing industry or community.

As the peak Australian and New Zealand greyhound industry representative body, GA's priority obligation is to ensure the welfare of greyhounds while supporting the integrity, sustainability and growth of the sport. Although the state and territory member bodies are accountable for individual jurisdictional regulation, and the wider industry is tasked with proactively upholding an agreed level of whole-of-life-cycle welfare standards, it is imperative that GA provides the overall strategic leadership necessary to coordinate a collaborative approach to national industry management, policies and practices.

In line with the responsibilities of GA's members, each state and territory control body has a standard of animal welfare, policies and codes of practice in place. These are largely based on GA's National Animal Welfare Policy (GANAWP), which detail the acceptable standards of care and management of greyhounds in race training and retirement, including the promotion of Greyhound Adoption Programs (GAP) and humane euthanasia practices.

Using these as guides, and as the first step in preparation for undertaking this review, GA formulated a set of Required Standards for Countries Seeking to Import Australian Greyhounds, which would be used to inform GA of export host country compliance with Australia's standard of greyhound welfare. They would also guide GA's long term objective of developing universally regulated industry standards for the export of greyhounds from Australia.

While the domestic greyhound export market is relatively small in comparison to the total Australian greyhound population, the main outcome of GA's review was to provide a snapshot of current greyhound racing export host country welfare performance and compliance against the Australian standards. This information would be drawn from a self-assessment questionnaire, devised from the set of standards.

In conducting the review, GA was able to articulate its expectations of host countries; gather, assess and compare current welfare standards in order to identify strategies to increase industry compliance with its National Racing Rules (NRR) and the Greyhound Passport Scheme; further develop reciprocal compliance and reporting relationships to more accurately record the number of greyhounds which are leaving Australia; and establish a framework and accompanying policies to ensure greyhounds are only exported to approved countries.

Input on export host country animal welfare standards was sought from the industry administrators of seven key regulated export jurisdictions with the greatest demand for Australian greyhounds. These countries were identified from the recorded export control process statistics of GA's Greyhound Passport Scheme and the Commonwealth Department of Agriculture's Biosecurity unit . The self-assessment questionnaire was distributed to these countries and comprehensively addressed the welfare standards sought from each country with a view to GA assessing compliance against its required standards in an appropriate, efficient and credible manner. This assessment period took six months, concluding in December 2012.

Following thorough analysis of the questionnaire results, GA concluded that only two of the seven surveyed host jurisdictions were fully compliant with the Required Standards for Countries Seeking to Import Australian Greyhounds; United Kingdom and the Czech Republic. Further, three

jurisdictions were assessed as being close to fully compliant (Ireland, United States, New Zealand), while one country each was considered not fully compliant (Macau) and non-compliant (Vietnam).

While information obtained by fully compliant jurisdictions United Kingdom and the Czech Republic indicate that both industries are highly regulated and operate similarly to Australia, there is room for improvement in jurisdictions that were assessed as below this standard. The countries which are considered close to fully compliant – Ireland, the United States and New Zealand – do all operate within a highly regulated environment and are overseen by an appropriate industry control body to ensure a standard of welfare for all racing greyhounds, however, questionnaires received were lacking some detail.

As New Zealand is also required to comply with Federal Government export processes and is one of GA's member industry control bodies and therefore, subject to GA's governing code of conduct, current welfare issues identified through GA's self-assessment questionnaire process are being considered by Greyhound Racing New Zealand's Greyhound Racing Committee.

No questionnaire results were received from Vietnam as it indicated there is no requirement to import greyhounds from Australia and therefore, they are non-compliant. As a result, passports will not be issued for Vietnam.

Macau is the only jurisdiction which was assessed as "Not fully compliant" at the end of this process which included GA and Macau representatives meeting in both Australia and Macau to thoroughly examine this jurisdiction's greyhound welfare performance. It is GA's view that further regulatory rules, policies and procedures must be put in place to address areas of concern and support the ongoing welfare of greyhounds throughout their life cycle in this jurisdiction.

While GA may likely withhold greyhound passports to jurisdictions such as Macau which are below a standard of "Fully compliant" or "Close to fully compliant", it will continue to work with these jurisdictions on activities and processes designed to reach full compliance. GA will continue to monitor the standards of countries that are close to fully compliant.

GA recommends that passports only be issued to these jurisdictions where formal associations are in place.

While GA acknowledges that it is unable to control the export of all of Australian greyhounds due to a lack of regulatory powers, it will continue to seek full industry compliance with its passport scheme. It is acknowledged that although the review has provided a mechanism for identifying problem export jurisdictions, its impact will be lessened if GA cannot enforce compliance with its Greyhound Passport Scheme.

GA has determined that the apparent policy gap in stopping the export of Australian greyhounds to countries which do not meet minimum welfare standards will need a joint approach from both the wider greyhound racing industry and government in order to effectively regulate the issue of greyhound welfare and provide necessary strength to the system. GA is, therefore, committed to working with the Federal Government to implement a system where only countries sanctioned by GA through its Required Standards for Countries Seeking to Import Australian Greyhounds are legislatively approved to import Australian greyhounds.

GA considers that further support with its passport compliance efforts is needed from host countries and it is suggested that these jurisdictions refuse to accept a greyhound imported from Australia that does not have the appropriate greyhound passport. GA also proposes to continue working with its members to encourage greater transparency on the issue of greyhound exports and recommends tougher sanctions be imposed on offenders of the Greyhound Passport Scheme by control bodies.

All greyhound passport applications received for unregulated countries will continue to be assessed on a case-by-case basis; however, it is extremely unlikely that these applications would be successful unless the applicant can prove that the unregulated country complies with the Australian Greyhound Export Welfare Standards. GA recommends that the NRR be updated to ensure compliance with GA's Greyhound passport scheme as it relates to non-regulated countries.

While the review cannot be considered conclusive as the few discrepancies in responses mean that independent verification may be needed, the results of the self-assessment questionnaire has provided GA with a broad understanding of welfare issues and a first assessment of the level of compliance with GA's required standards among key Australian greyhound export jurisdictions.

Strengthening the export process required the support and assistance of the GA Board and it is proposed that an annual review of the Required Standards be considered to ensure they are contemporary and reflect the current state of the industry. Publishing the final review report and host country export standards on GA's website will also assist with GA's goal of educating industry participants and informing the community about our expectations, processes, challenges and actions.

As part of its proposal for a new compliance regime, GA recommends the Board accept the thirteen recommendations of the review outlined in this report and allocate the appropriate resources needed for both their implementation and for GA to undertake future audit and compliance activities. This will ensure that GA can continue to remain focused on its compliance efforts and that greyhound welfare becomes a regulated, whole-of-industry priority when assessing the suitability of Australian greyhounds for export.

PART A

Introduction

1. Forward

1.1 About GA

GA is a not-for-profit public company responsible for the administration of policies and objectives on behalf of its members and the wider greyhound racing industry. GA's membership base is representative of the nine independent jurisdictional industry control authorities across Australia and New Zealand, including:

- Racing Queensland Limited
- Greyhound Racing Victoria
- Canberra Greyhound Racing Club
- Northern Territory Racing Commission
- Racing and Wagering Western Australia
- Greyhound Racing New South Wales
- Tasmanian Racing Board
- Greyhound Racing SA Limited
- Greyhound Racing New Zealand

Governed by a Board of Directors, GA is the integrated entity providing strategic direction to the Australasian greyhound industry by holistically encouraging the wellbeing of greyhounds throughout their life cycle via collaboration and support of its members. Although a representative from each of these member bodies comprise GA's Board, regulation is something which is performed at the state and territory level, allowing each controlling authority to govern the activities that take place within their own jurisdiction. GA therefore, provides the strategic leadership necessary to promote the integrity of the industry and, where possible, coordinate a national approach to industry management, policies and practices.

Key services that GA undertakes on behalf of its members and the wider greyhound industry include:

- Providing DNA services for participants and its members
- Producing an annual stud book of greyhounds named and litters registered
- Funding national greyhound initiatives, including research and development
- Establishing international alliances with overseas greyhound racing countries
- Assisting with maintaining the integrity and fair conduct of greyhound racing
- Administering a national frozen semen database
- Naming greyhounds on behalf of its members
- Monitoring greyhound welfare through the development of the Greyhound Passport Scheme and associated policies.

GA has established a welfare committee (GAWC) to collaboratively exchange information and encourage a consistent, national application to greyhound welfare and breed development issues, including welfare risk management, life cycle tracking protocols, adoptions, and associated welfare management matters.

The GAWC is also responsible for overseeing and recommending control procedures in respect of animal welfare, setting, reviewing and recommending national policies, overseeing the implementation of welfare compliance matters, and undertaking any other such related matters that are deemed appropriate and are delegated by the GA Board.

1.2 Background to the review

The most emotive and pressing concern the industry has dealt with in recent times is greyhound welfare. In line with other Australian racing codes, animal welfare is a priority for the greyhound racing industry and as a result, all of GA's member bodies are expected to have animal welfare policies and codes in place which meet GA's Australian Greyhound Health and Welfare Standards (refer Attachment A). It is part of the GAWC's role to collaboratively exchange information that encourages a consistent national application to greyhound welfare and breed development.

At the June 2011 meeting of the GAWC, it was agreed between delegates that a brief on animal welfare standards for countries importing Australian greyhounds would be prepared. This course of action was prompted by reports that the welfare standards of one export jurisdiction may not be at an acceptable level.

In August 2011, the GA Board subsequently resolved that the CEO would undertake a review into Australia's greyhound exports following a recommendation by the GAWC. The Committee further suggested that standards be developed for countries that import Australian greyhounds, which would then be assessed against Australia's national health and welfare standards and imposed upon importing countries. Following the establishment of these standards, GA would be able to clearly articulate what is expected of destination countries before, during and after the export process takes place and further develop reciprocal compliance and reporting relationships.

GA is also keen to establish procedures within Australia to more accurately assess foreign jurisdiction compliance against domestic standards. It is envisaged that GA will develop and impose compliance standards on countries importing greyhounds from Australia and, where standards aren't met, develop a suitable plan of action that enables the offending jurisdiction to reach a level of full compliance within an agreed time frame. If this does not occur, a ban – by way of the withdrawal of greyhound passports – could then be placed on the export of greyhounds to the jurisdiction in question until welfare standards are met.

While this is seen as a reasonable course of action, it is clear to GA that even if a ban on the export of greyhounds to non-complaint jurisdictions was put in place, GA has limited regulatory power to fully enforce such a ban without assistance from the Federal Government. Although GA monitors the export of greyhounds to a reasonable extent through its Greyhound Passport Scheme, this application process only covers greyhounds which are part of the racing population or owned by an industry participant. It is stipulated in the Greyhound Australasia Rules (GAR) that any person exporting a greyhound(s) to another country must obtain a greyhound passport prior to meeting the requirements of the Commonwealth's Australian Quarantine and Inspection Service (AQIS) (now Department of Agriculture's Biosecurity Unit). More specifically:

“Any person intending to export a greyhound, being a greyhound the subject of these Rules or to those of a relevant Registration Controlling Body, from Australia or New Zealand to any other country (excluding Australia or New Zealand) must, prior to meeting the quarantine and inspection service requirements of the relevant country, obtain a greyhound passport and certified pedigree issued by Greyhounds Australasia.”¹

¹ Greyhounds Australasia Rule 124 (1), 13 October 2011

Under this rule, a greyhound passport will only be issued upon receipt of a completed application form (refer Attachment B) and mandatory declaration of a compliance clause specifying whether export is for racing, breeding or pet purposes.

While this passport scheme has been in operation for a number of years, its primary focus has been on the tracking of greyhounds to understand the intent of export. It is envisaged that as an outcome of this review GA can also include a mandatory compliance clause relating to the minimum welfare standards of the country to which the greyhound is to be exported. While this would certainly be an improvement on the current passport scheme, GA believes that it will not go far enough to satisfy industry and community concerns.

Acceptance by industry participants of the Greyhound Passport Scheme is widespread, however, the apparent number of greyhounds leaving the country without appropriate paperwork sits uncomfortably with GA members. It is acknowledged that the Greyhound Passport Scheme does not form part of the compulsory quarantine and export regulations required on a national basis and while the Department of Agriculture's Biosecurity Unit is supportive, it cannot enforce GA's Greyhound Passport Scheme without legislative amendment of the Commonwealth *Export Control Act 1982*. Accordingly, while industry has a rule in place, it is not currently enforceable as the Act only requires a companion animal (ie. a greyhound) to be fit for export.

1.3 Review conduct and process

The GA Board determined that the review would focus on identifying strategies to increase industry compliance with the Greyhound Passport Scheme and determined that these strategies would focus on compliance activities that:

- GA and member organisations can undertake
- Require Federal Government assistance

The review also undertook to outline the current export profile for Australian greyhounds to quantify the number of greyhounds exported each year and outline key destination countries.

The final part of the review included an initial analysis of welfare performance in all key export jurisdictions to identify areas of concern and develop a set of agreed export compliance standards against which all foreign export jurisdictions will be assessed. This involved the development and distribution of an export self-assessment questionnaire which was forwarded to each source country administrator for completion. The responses to this questionnaire form the basis of the jurisdictional assessment contained in Part C which also contains recommendations on an effective monitoring regime to assess ongoing compliance against the set standards.

PART B

Establishing Appropriate Welfare Standards

1. Welfare Standards Framework

One of the major objectives of GA's review was to establish a framework and accompanying policies to help ensure that Australian greyhounds are only exported to countries which meet acceptable animal welfare standards. For this to be achieved, a number of separate activities needed to occur. Firstly, the applicability of current GA National Animal Welfare Policy (GANAWP) to export jurisdictions needed to be assessed; secondly, the actual market for the export of Australian greyhounds needed to be assessed; and finally, the Australia Export Standards needed to be developed.

This process was undertaken by GA with assistance from numerous experienced sources and most notably, its members. The jurisdictional assistance was particularly important in the development of the export standards, as matters associated with the management of animal welfare issues in Australia rests with the state and territory greyhound racing bodies.

2. Greyhound Australasia National Animal Welfare Policy

GA first developed its National Animal Welfare Policy (GANAWP) framework in September 2005. The GANAWP is subject to annual review and is overseen by the GAWC and, consequently, the GA CEO and state racing body representatives.

The GANAWP works in conjunction with GA's Racing Rules (GAR), which provides for greater uniformity throughout the greyhound racing industry across Australia and New Zealand and minimises the need for local rules. In this regard, industry integrity is dependent on the GAR to ensure consistency for both participants and control bodies. A review of the GAR also occurs each year, with any appropriate consequent recommendations adopted by the GA Board. The last review of the GAR occurred in August 2013, with its revised form coming into effect on 1 January 2014. Implementation of the GAR and the GANAWP is the responsibility of all GA members.

The GANAWP and the GAR combined are crucial to the development of rules which cover animal welfare at all stages of a racing greyhound's life cycle. The key areas which these rules need to address are:

- Race meetings, including official race meetings and trials
- Greyhound ownership and breeding, including reporting on greyhound location, disease management, general care and control of greyhounds in public places
- Greyhound export and retirement, including registration, transfer of ownership, passports and certificates of pedigree.

The initial development of the GANAWP was in recognition of the critical issue of animal welfare affecting GA and its ability to achieve its organisational aims. While GA recognises that animal welfare is a complex issue, with science and ethics at its core, it also understands that if community expectations on welfare standards are not met, then support for the industry will be significantly eroded.

GA and other industry stakeholders make moral and ethical judgments on greyhound welfare based on sound research. At the same time, there is recognition that decisions, opinions and perceptions about welfare are also influenced by cultural, social, economic and occupational health and safety considerations. In addition, GA emphasises the importance of the necessary skills and responsibilities of animal carers and their role in good husbandry as well as the delivery of acceptable animal welfare outcomes.

GA will maintain its strong role in promoting high welfare standards and will continue to assist its members to ensure that all carers have access to the necessary animal welfare information and appropriate training. It is the responsibility of GA's state and territory member organisations to ensure that agreed welfare standards are met by owners, breeders and other industry participants in their jurisdiction.

GA's member organisations have done much to regulate and promote good animal welfare practices throughout Australia and New Zealand. For example, Greyhound Racing Victoria (GRV) brought together industry leaders with the RSPCA and respected veterinarians in 2006 to form the Responsible Breeding Taskforce (RBTF). This taskforce looked at all aspects of greyhound racing breeding and put forward a number of recommendations aimed at addressing the major issues identified within the sport. Consultation with industry participants through a discussion paper was also undertaken, as well as face-to-face sessions at a number of race meetings.

The outcome of this review process saw 17 recommendations put forward to GA to address a variety of important issues, including better industry education, increased levels of enforcement and expanded racing opportunities, as well as suggested rule changes. Each recommendation was designed to optimise the likelihood of each greyhound bred going on to race. These recommendations were considered nationally and in 2008, GA adopted 10 of the 17 proposed recommendations (refer Attachment C).

In 2011, Greyhound Racing NSW (GRNSW) established a Greyhound Welfare and Veterinary Services Unit, which now employs three full time veterinary surgeons and a qualified animal behaviourist to oversee the welfare of greyhounds throughout their racing life and transition to pet. In July of the same year, GRNSW introduced a mandatory Code of Practice for greyhounds in race training, which defines the standards required for the treatment of and facilities required for the kenneling of racing greyhounds in NSW. The Code emphasises the importance of good management practices as well as the legal liability and requirements under the *NSW Prevention of Cruelty to Animals Act 1979* and Clause 20 of the *Prevention of Cruelty to Animals Regulation 2006*.

GRNSW has been proactive in ensuring continual improvement in greyhound welfare and is committed to driving the cultural change needed to ensure greyhound racing in NSW meets community expectations through:

- Improved education of breeders and trainers
- Improved track preparation
- Race programming that maximises the racing life of greyhounds
- Increased re-homing
- Introduction of race day and club welfare policies (including veterinarians at ALL meetings)
- Encouraging responsible breeding practices
- Continued promotion of the greyhound breed and greyhounds as pets through the funding and management of the Greyhounds as Pets initiative and the development and management of the NSW Muzzle Exemption Program, Greenhounds.

Both the GRV Responsible Breeding Taskforce and the GRNSW Greyhound Welfare and Veterinary Services Unit and Code of Practice are a result of the practical application of the GANAWP.

The GANAWP principles are articulated as follows:

*GA acknowledges that the greyhound racing industry, its promoters and regulators are collectively accountable for the welfare of all animals involved in greyhound racing in Australasia. GA believes that this accountability covers the whole life cycle of the greyhound.*²

GA has identified the basic needs of greyhounds as being:

- Readily accessible food and water in sufficient quantities to maintain health and vigor
- Freedom of movement to stand, stretch and lie down
- Regular exercise
- Shelter and accommodation that provides protection from the elements
- Protection from disease and regular inspections to assess the need for attention to feet, teeth, and internal and external parasite control
- Rapid identification and treatment of injury and disease.

In identifying these basic needs, GA has relied upon research and the vast collective wealth of experience among Australian breeders, trainers and animal carers.

GA and its member organisations are aware of cases of mistreatment within the industry and acknowledges that a minority of individuals have not followed GA's best practice standards. The industry is working diligently to identify these individuals and ensure poor practice is stopped immediately.

GA condemns:

- Any form of cruelty and neglect of greyhounds and other animals – appropriate action must be taken where such cruelty or neglect is identified, including consulting with the RSPCA or other relevant authorities that are in a position to take action against an offender
- The use of any live animal in the training or racing of greyhounds
- The use of greyhounds for unauthorised or unjustifiable medical or other experiments
- The export of greyhounds to countries without a properly managed greyhound racing industry, or where such an industry is not sufficiently regulated to ensure the welfare of greyhounds.

These principles have guided the development of the standards outlined in the GANAWP, which have been drafted in a way that can both directly inform GA's GAR as well as members' own animal welfare policies and initiatives. The standards have been developed to ensure the responsible care and humane treatment of all racing greyhounds. They do not apply to greyhounds which are outside of the racing population such as pets and kennel club animals.

GA expects all industry participants to abide by these standards to ensure that:

- All greyhounds shall be housed in comfortable, clean, safe and well ventilated kennels
- All greyhounds shall receive nutritious food and plenty of water
- All greyhounds shall be provided appropriate exercise in clean and safe areas
- All greyhounds shall receive prompt veterinary care

² Greyhounds Australasia National Animal Welfare Policy (GANAWP), 2 July 2012

- All greyhounds shall be trained and cared for by qualified, competent and responsible personnel according to established animal welfare guidelines.

GA is also concerned with the complex issues associated with retired greyhounds and as such, will actively promote greyhound adoption programs in all states and territories.

Much of the responsibility for maintaining animal welfare rests with greyhound racing clubs. GA supports and promotes policies and regulatory proposals that require greyhound racing clubs and associated organisations to:

- Provide and maintain a safe racing environment to minimise the risk of injury to greyhounds before, during and after a race, including at trial tracks
- Make clubs accountable for greyhound welfare issues associated with the club's facilities and activities
- Provide first aid resources and facilities at all trial and race meetings
- Ensure prompt access to veterinary services for injured greyhounds at all races and trials.

To help enforce appropriate accountability for animal welfare amongst all key stakeholders, GA supports the development of:

- Lifetime 'tracking' of all greyhounds
- Policies and initiatives to extend the racing life of greyhounds where this does not adversely affect the welfare of the greyhound
- Industry approved greyhound adoption or re-homing programs
- Responsible Breeding policies that support the principles of animal welfare.

The GANAWP also contains best practice guidelines for standards of care. These guidelines are designed to provide direction to owners and articulate what is expected of them in the areas of:

- Standards of care from conception, whelping and rearing of pups to twelve weeks
- Kennels
- Hygiene
- Transport
- Race training care
- Health, veterinary care, disease and ill health
- Retirement
- Euthanasia.

In May 2014, the industry adopted a national approach to greyhound welfare to ensure the best possible strategies were adopted across the country and to ensure standards of greyhound care are not impacted by greyhound movement between states and territories. Industry wide strategies are now in place to optimise breeding, career and retirement outcomes for greyhounds, participants and the community.

3. Australian Export Standards

The development of GA's Required Standards for Countries Seeking to Import Australian Greyhounds (refer Attachment D) was undertaken with regard to both the GANAWP as well as the current passport arrangements as outlined in the GAR. Throughout this process, GA had to ensure that the expectations of its members and the wider community in regard to appropriate standards

would be met while making the export standards effective and implementable, especially given the differences in culture and government regulation in host countries.

The direct application of GANAWP upon export countries is considered impractical as it would fail to take into account the regulatory structure and rules under which racing organisations operate in these jurisdictions as well as the legislative welfare standards already imposed by these countries.

The GANAWP is designed specifically for application to the Australian greyhound racing context and assumes a level of advancement on animal welfare issues and industry structure which may not exist in certain export destinations. For example, GANAWP relies on the GAR and local jurisdictional policies to effectively implement welfare standards – something which may not be the case in other countries. It also relies on government legislation to cover general issues of animal welfare beyond those specific to the greyhound racing industry.

In resolving this trade-off between the insistence of high standards versus ensuring the standards are effective, GA has consciously erred on the side of maintaining the standards. GA envisages that as these standards are disseminated to export jurisdictions, racing body issues relating to the ability to comply will arise. These issues could be borne from direct conflicts between the GA Australian Export Standards and the jurisdiction-specific regulations under which these racing organisations operate. They could also arise where the methods of meeting compliance are not aligned with GA's standards but the outcome in terms of animal welfare is equally favourable. As such, GA has decided to address this through its compliance regime (refer Part C), dealing with each jurisdiction on a case-by-case basis.

The key difference between the GANAWP and the Australian Export Standards is that the guiding principles outlined in the GANAWP are required standards. This ensures that GA's position is clear and not open to interpretation. They also focus on providing the export host countries with the appropriate operational structures to effectively manage welfare issues.

To recognise differences in culture and legislation and ensure that the Australian standards are able to be enforced, it is expected that any host countries seeking to import Australian greyhounds will also need to carry out the following compliance activities:

- Maintain accurate record keeping to ensure that the owner of a greyhound (and hence, the person directly responsible for the animal's welfare) is known at all times
- Undertake permanent identification of greyhounds
- Adhere to minimum husbandry requirements relating to nutrition, health and veterinary care, housing, hygiene, exercise, transport and security
- Participate in applicable licensing and education activities
- Monitor and report on breeding and rearing practices (where necessary)
- Clearly document and make accessible:
 - Training and education material for local participants in support of the international standards to ensure the ongoing welfare of the greyhound
 - Policies for post-racing welfare requirements, including an outline on retirement, rehoming opportunities and acceptable method(s) of euthanasia
 - Race day procedures, including the requirement for a registered veterinarian to be accessible for all race meetings – overall assessment of track safety is also paramount
 - Formal rules of racing, including drug testing protocols.

The Required Standards for Countries Seeking to Import Australian Greyhounds are not to be viewed as a substitute to broader animal welfare regulation. This policy is only designed to set minimum standards for greyhounds in the racing industry and recognises that GA has no ability to influence the standard of treatment of animals, including greyhounds, which have been exported as pets or for other non-racing purposes.

Also, GA does not have the ability to stop greyhounds being exported to countries which do not meet minimum welfare standards. Although discussed further in this report, this apparent policy gap will require a joint approach from both the greyhound racing industry and various levels of government in order to be effectively resolved. GA is extremely keen to do all it can to ensure that both minimum welfare standards are met by export countries as well as restrict the supply of Australia greyhounds to non-compliant countries.

The Australian Export Standards contain explicit standards relating to the care and management of greyhounds in training (i.e. in the racing population). It does, however, also seek to deal with the treatment of greyhounds once they are retired and promotes greyhound adoption schemes and the strong regulation of euthanasia practices. While these standards are not negotiable, GA will work with countries on how they meet the standards to improve welfare outcomes. As with the Australian principles, these standards cover:

- Greyhound housing: kennel sizes, location and construction
- Health and veterinary Care: health checks, veterinary care and euthanasia
- General welfare: exercise, hygiene, pest control, waste disposal, food and water, etc
- Clubs, tracks and racing: safety, venue upkeep
- Life cycle accountability: rules, record keeping, retirement.

These standards were then used to generate a self-assessment questionnaire for each key export jurisdiction.

A copy of the Host Country Greyhound Export Self-assessment Questionnaire is contained in Attachment E, and a summary of results follows at Attachment F.

4. Industry development and profile

Like many other pedigree dogs and racing animals, Australia's greyhounds have for many years been exported to foreign jurisdictions for the purposes of breeding, introduction to the racing population, or housed as domestic pets. Reports on the statistics of such often circulate within the public domain and suggest that thousands of greyhounds are exported from Australian shores each year.

However, the actual number of greyhounds exported from Australia each year is compiled by the Department of Agriculture's Biosecurity Unit, who records much lower numbers than those indicated in the press. In 2010, Biosecurity recorded 777 greyhounds exported to international destinations, with a decrease in this figure to 703 in 2011. Nevertheless, these numbers are not truly representative of racing greyhounds, as they do not distinguish between a registered racing greyhound, a (non-racing) kennel club registered greyhound, or non-racing breeds of greyhound..

Regardless of purpose, every greyhound exported from Australia must meet the Department's Biosecurity regulation in addition to any specific laws which exist in the host export country. The issue of what control Australia has over exported greyhounds, and the awareness of what animal welfare standards exist in host countries, has been difficult to assess. This in turn has proved a

challenge when comparing foreign standards with those expected – and adhered to – in Australia in order to formulate a sound position on the need for universal industry regulation.

In July 2004, all GA member bodies agreed to the development of a Greyhound Passport Scheme. A relevant clause was appropriately introduced into the GAR with the purpose of allowing GA jurisdictional members to better oversee the export of greyhounds and provide a process for the appropriate tracking of exports. Ultimate responsibility for declaring the purpose of export rests with greyhound owners.

It is GA's expectation that greyhounds will currently only be issued a passport if they are being exported by licenced persons for the purpose of:

- Racing
- Breeding
- As a pet.

Notably, GA's greyhound passport does not form part of the compulsory quarantine and export regulation requirements of the Federal Government. While supportive of GA's efforts to enforce an industry-wide culture of compliance, the Department of Agriculture's Biosecurity Unit cannot enforce GA's passport scheme as greyhounds are regulated under the *Export Control Act 1982* which would require amendment to allow the Scheme to have legislative affect.

PART C

Undertaking the Export Standards Review

1. Purpose of the Review

The export standards review was undertaken to provide a snapshot of current compliance standards against GA's Required Standards for Countries Seeking to Import Australian Greyhounds. While this review is by no means conclusive, it has provided GA with a high-level understanding of problems associated with export destinations which will then be used to focus GA's compliance efforts over the short to medium term.

While the compliance statistics themselves will be of interest, it should be noted that they have been provided to GA on a self-assessment basis. Results may need to be independently verified to gain a comprehensive understanding of the statistics provided, and will also need to be matched against export numbers so the size of the current export market and, indeed, the market for Australian greyhounds in each host country, can be determined.

This section provides an overview of the:

- Export market for Australian greyhounds
- Process for assessing current levels of compliance with the required standards
- Current compliance levels against the standards
- Short to medium term approach to exporting greyhounds to each host country.

1.1 The overseas market for Australian greyhounds

It is GA's understanding that the export of Australian greyhounds dates back at least 40 years and has predominantly focused on racing, with the vast majority of greyhounds introduced to the host country's racing population. It is mandatory that every greyhound exported from Australia must meet the Department of Agriculture's Biosecurity Unit regulations as well as the requirements of local laws that may exist in the host country. The Department makes available information on these requirements via its website and also provides country-specific information upon request.

The Department of Agriculture's Biosecurity Unit does not assess host countries for compliance against greyhound welfare standards through its regulatory process, nor does it have different procedures in place to cover the different reasons for export (racing purposes, breeding purposes or as a pet). A lack of government information on the welfare standards of overseas jurisdictions has made it difficult for GA to control welfare outcomes and made it important that the industry to undertake its best endeavours to ensure exporters notify GA of their intention to export, for exporters to obtain GA's approval for export, and for GA to assess the suitability of jurisdictions for export..

As a first step in attempting to regulate the export of racing greyhounds, all member bodies of GA implemented a Greyhound Passport Scheme under GAR 124 in July 2004.³ The purpose of this rule was to allow GA jurisdictional members to better oversee the exportation of greyhounds and provide a process for the appropriate tracking of exports, with ultimate responsibility for declaring the purpose for export resting with owners. While providing GA with extremely useful data on greyhound export numbers, this rule has not been as effective in regulating greyhound exports as GA had expected because:

- Any greyhound can be legally exported without a GA passport
- The suitability of potential export destinations had not been adequately assessed from an greyhound welfare perspective.

³ Greyhound Australasia Rules (GAR), effective 1 January 2013, <http://www.galtd.org.au/greyhoundsaustralasia/files/GA%20Rules%202013.pdf>

While the first two points will be further addressed in Part E, this section aims to assess the animal welfare report card of each current export destination.

Based on available statistics from the Department of Agriculture's Biosecurity Unit, GA believes Australian greyhounds have been exported to the following countries between the years 2010 to 2011:

Host Country	2010	2011
Argentina	5	13
Austria	1	1
Belgium	-	1
Canada	-	1
China	24	19
Czech Republic	-	5
Fiji	-	1
Finland	1	-
Germany	-	1
Hawaii	-	2
Hong Kong	135	65
India	-	1
Italy	3	-
Macau	280	309
New Caledonia	1	-
New Zealand	330	272
Pakistan	1	1
Russia	4	1
Singapore	2	-
Thailand	2	-
United Kingdom	6	3
United States	2	7
TOTAL	797	703

While the Department has advised Australian greyhounds have been exported to over 20 countries since 2010, the vast majority of greyhounds go to two host jurisdictions: New Zealand and Macau (special administrative region of the People's Republic of China).

Although New Zealand is a member of GA, greyhounds exported to this country are still required to comply with Biosecurity processes. Prior to 1 January 2010, New Zealand importers were also required to obtain a greyhound passport prior to export under GAR 124. This rule was changed because New Zealand was a member of GA, however, it is a recommendation of this review that New Zealand again be required to comply with this rule to ensure consistency with GA's Required Standards for Countries Seeking to Import Australian Greyhounds.

Summary of Export Numbers via GA’s Passport System

Year	New Zealand	Macau	Other Countries	Total (GA Passport)	Total (Department)
2008	491	244	86	821	N/A
2009	355	376	75	806	N/A
2010	306 ⁴	269	26	601	777
2011	247	348	27	622	703
2012	198	369	4	571	N/A
2013	272	29	6	307	N/A

2. Source Country Analysis

2.1 Consultation plan and process

The review consultation process was undertaken by GA’s CEO between May and December 2012 following the initial stage of development which involved the formulation of GA’s Required Standards for Countries Seeking to Import Australian Greyhounds. The export country self-assessment questionnaire was then drawn directly from the standards and was designed to assess jurisdictional compliance in an efficient and credible manner.

Despite the reasonable number of recorded jurisdictions where Australian greyhounds are exported, GA consulted initially only with those countries that had a body responsible for the regulation of greyhound racing and that it had established a direct relationship with, this provided credibility to the self-assessment questionnaire. All other jurisdictions were then dealt with prospectively on a case-by-case basis, with a welfare standard review occurring once an application for a greyhound passport is received.

It was determined in the early planning stages of the review that the only way to effectively assess current compliance rates against the standards was via self-assessment. Whilst GA fully acknowledges that these responses may need to be independently verified over time, the questionnaire was an extremely effective way of identifying potential compliance issues and determining GA’s response. The reliability of responses was supported by withholding GA’s Required Standards for Countries Seeking to Import Australian Greyhounds from respondents, ensuring they were unaware of the expected levels of compliance.

The GA questionnaire covered all areas of both on and off-track welfare standards, providing GA with a good benchmark of compliance across the entire export market. Specifically, the questionnaire covered:

- Housing
 - Location of kennels
 - Construction and general requirements of kennels
 - Kennel size
- Health and Veterinary Care
 - Health checks
 - Veterinary care
 - Euthanasia

⁴ Data on all exports from 1 January 2010 is provided by New Zealand Greyhound Racing Association (Inc.); unnamed greyhounds are not recorded, which affects the accuracy of results from New Zealand.

- General Welfare
 - Identification
 - Exercise
 - Hygiene, cleaning and disinfection
 - Pest control
 - Waste disposal
 - Transport
 - Food and water
 - Feeding
- Clubs/Tracks/Racing
 - Track maintenance
 - First aid resources and facilities
 - Injury treatment
 - Live animal baiting for training
 - Race rules, policies and operating standards
 - Race training care
 - Licensing and education
- Accountability/Responsibility
 - Life cycle tracking
 - Extension of racing life
 - Greyhound adoption programs
 - Record keeping
 - Greyhound retirement
 - Responsible breeding initiatives

The questionnaire was sent out to export host country industry administrators in June 2012 for initial response within six weeks. As was anticipated, most jurisdictions required more time to submit responses and requested further advice on what information was sought by GA. Once the responses were received, GA then followed up on items which were either incomplete or not addressed. Further information was also sought by GA as evidence of standard compliance where necessary. The questionnaire and response process was finalised in early December 2012.

Overall, the receptiveness and response rate to GA's request for information was positive. It did however, alert GA to some cultural differences between countries which will assist in the process of tailoring future questionnaires to ensure they are meaningful to all jurisdictions surveyed.

2.2 Export Self-Assessment Questionnaire Summary

For the purposes of GA's review, a regulated country is that which has a central body that supports regulation of the industry and its participants. This body can either be government owned or regulated, or in some cases, a private organisation.

An unregulated country is one where greyhound racing is an amateur sport, illegal, non-existent, or where GA is unable to communicate with a governing body about the host country's standard of animal welfare. For the purposes of the review, an unregulated country is also a foreign destination where Australian exporters have applied for a greyhound passport within the last 12 months.

Regulated Countries

1. United Kingdom

The Greyhound Board of Great Britain (GBGB) is the governing body of licensed greyhound racing sport in England, Scotland and Wales. Upon its recent establishment in January 2009, GBGB was tasked with the combined functions of the British Greyhound Racing Board and the National Greyhound Racing Club and has responsibility for greyhound racing industry welfare, regulation, finance, administration and management. While the industry sector remains self-regulated, the creation of this single body arose as a result of the Independent Review of the Greyhound Industry in Great Britain undertaken in 2007. The outcome of this review was the result of a raft of recommendations aimed at improving the efficiency and effectiveness of sectoral regulation, and raising welfare standards within Britain's greyhound industry.

While the GBGB's structure enables ultimate authority over the sport, support is given by an independent Greyhound Regulatory Board and several committees which assist with issues in the areas of welfare, racing, finance, disciplinary matters, and industry appeals.

According to the GBGB, annual attendance at Britain's 26 racing tracks is more than 2 million, with approximately £2.5 billion wagered both on and off the track⁵. Although one of the UK's most popular spectator sports, the Department of Agriculture Biosecurity Unit's export data indicates that only six greyhounds were exported to the region in 2010 and three in 2011, while GA's passport scheme shows that no greyhounds were exported to this jurisdiction in either of these years.

The GBGB's self-regulatory framework, Rules of Racing and support by government regulation ensures participants in the sport adhere to stringent welfare and integrity standards. Millions of dollars are said to be spent by the GBGB on greyhound welfare each year.

The UK's completed self-assessment questionnaire indicates that the industry operates similarly to Australia, with a mix of hobby and professional trainers. The wellbeing of all greyhounds is the intended priority in each process and practice undertaken by the GBGB, and the questionnaire results indicate full compliance with GA's export welfare standards.

2. Ireland

The Irish Greyhound Board (IGB) is a commercial semi-state body with responsibility under the *Greyhound Industry Act 1958* for the regulation and development of the greyhound industry in the Republic of Ireland. This includes matters relating to track licensing, official, trainer and bookmaker permits, and the implementation of the racing rules.

⁵ Greyhound Board of Great Britain, <http://www.thedogs.co.uk/Default.aspx>

The IGB owns and manages nine out of the 17 licensed greyhound stadia located in the Republic of Ireland, with the remaining operating under private ownership. Two further privately owned stadia also exist in Northern Ireland.

The Irish Coursing Club (ICC) was established in 1916 and chartered with responsibility for greyhounds under the *Greyhound Industry Act 1958*. The ICC is a recognised controlling authority over matters relating to the breeding of racing greyhounds and greyhound coursing (including registration and identification), and has operative functions relating to greyhound racing and training for reward in accordance with local laws.

The primary objectives of the ICC is the promotion of responsible greyhound breeding (including maintaining the Irish Greyhound Stud Book), encouragement and regulation of greyhound coursing (including provision for ICC affiliation of local coursing clubs), contribution to the regulation of greyhound racing and training for reward, and the provision of input into the development of Ireland's greyhound industry (including providing for ICC affiliation to persons owning or exercising control over greyhound race tracks).

Notably, coursing operates within a highly regulated environment in Ireland under a licence administered by the Minister for Arts, Heritage and the Gaeltacht. The ICC's comprehensive industry rules are directly applied in parallel to government regulation.

Owners, trainers and breeders in Ireland are governed by the *Welfare of Greyhounds Act 2011*, which sets out clear provisions relating to the welfare of greyhounds. The IGB and ICC, together with local authorities, are responsible for enforcement of this Act. Further, the IGB is also obliged to publish a Code of Practice as part of the Act's compliance measures.

Despite the results of Ireland's self-assessment questionnaire indicating a vigorously regulated industry that operates similarly to Australia, as well as a high standard of compliance to ensure the welfare of greyhounds, GA is unable to fully endorse the host country due, primarily, to a lack of detail particularly around the practical application of their Greyhound Code of Practice's minimum dimensions for greyhound kennel sizes.

The Department of Agriculture Biosecurity Unit's export data indicates that for the calendar years 2010 and 2011, no Australian greyhounds were exported to Ireland and therefore, full compliance with the Australian Export Standards is not a priority concern. However, GA will continue to work with IGB to resolve areas of potential non-compliance and is hopeful that full compliance with the Australian Export Standards will be achieved in the short to medium term.

3. United States

The National Greyhound Association (NGA) is the racing greyhound registry body for track operators and individual racing jurisdictions on the North American continent. A not-for-profit association, the NGA's aim is to uphold the sport's credible reputation and promote the wellbeing of greyhounds. In assisting to meet this purpose, the NGA together with the Greyhound Track Operators Association (AGTOA) established the American Greyhound Council (AGC) to *develop, fund and oversee programs to ensure the welfare of racing greyhounds on the farm, at the track and upon retirement.*⁶

While close to fully compliant with GA's export standards, it is clear from the self-assessment questionnaire results that the industry in the US operates slightly differently to Australia. Most significantly, any greyhound that is kenneled at a track is regulated by state legislation and the

⁶ The National Greyhound Association, <http://ngagreyhounds.com/page/welfare>

NGA is only responsible for setting and enforcing guidelines for greyhound farms. As an industry driven for commercial profit, a larger percentage of kennels are aligned to racing tracks. It is worth noting however, that greyhound farms in all US states fall under the regulation of animal welfare laws and requirements. A few states additionally need to adhere to guidelines set by the state racing commission or the state department of agriculture.

While highly regulated, GA will follow up this jurisdiction on several compliance issues including kennel sizes.

The Department of Agriculture Biosecurity Unit's export data indicates that two greyhounds were exported to the region in 2010 and seven in 2011, while GA's Greyhound Passport Scheme did not record that any greyhounds were exported to the region during either year.

4. Czech Republic

Although only a small industry which operates with approximately 50-100 competing greyhounds, the Czech Greyhound Racing Federation (CGRF) is the principal regulatory body for racing greyhounds in the Czech Republic.

An extremely professional and fully compliant jurisdiction, the welfare of racing greyhounds is of upmost importance to the CGRF, which is reflected in an industry guided by mandated rules that are largely based on Australia's code of conduct.

5. Vietnam

A 25 year licence was granted to Sports and Entertainment Services Ltd (SES) to operate greyhound racing in Vietnam in 1999, which included the rights to conduct totalisator betting.

SES originally imported greyhounds from Australia but as it now has its own breeding program, has not imported Australian greyhounds since 2009.

Vietnam did not complete GA's self-assessment questionnaire and is therefore, a non-compliant jurisdiction. Vietnam indicated that it has no future need to import greyhounds from Australia.

6. Macau

The Macau Canidrome is managed by an independent board of directors who are regulated by the Macau Government's Gaming Inspections and Coordination Bureau based on site at the Canidrome.

Macau is currently not fully compliant with GA's export standards based on the results of its self-assessment questionnaire. Appropriate regulatory rules, policies and procedures must be put in place to support the ongoing welfare of all greyhounds in Macau during and post-racing career. Particular areas of concern to GA include:

- Track maintenance processes and procedures
- Provision and maintenance of a safe racing environment to minimise the risk of injury
- Injury rates and seriousness to minimise the need for euthanasia
- Kennels
- Policies and initiatives to extend the racing life of a greyhound

A comprehensive in depth analysis into Macau can be found in Part D - Macau Site Visit.

7. New Zealand

The New Zealand Greyhound Racing Association (NZGRA) is one of GA's nine independent industry control bodies and is hence, subject to GA's governing code of conduct.

The results of NZ's self-assessment questionnaire indicate that it is close to fully compliant and the following welfare issues are currently being considered by the NZGRA's racing committee:

- Policies and initiatives to extend the racing life of a greyhound
- Kennels
- Euthanasia.

Unregulated Countries

Australian exporters have applied for greyhound passports during the past six months for the following four unregulated countries:

1. China
2. United Arab Emirates
3. Japan
4. South Africa

Until the review is finalised and recommendations are endorsed by the GA Board, it has been agreed that a process of assessment to best manage the export of greyhounds to these countries will occur on a case-by-case basis. Specifically, when a greyhound passport application for an unregulated country is received, GA issues the Australian exporter with a standard letter outlining further required information to assist with determining approval or not. Provision of a passport is then subject to the comfort derived from the exporter's response.

Of the four countries listed above, only one passport has been issued in response to a request to export a greyhound to Japan during this period. In stating this, it must be noted that anecdotally the information provided by the exporters requesting passports for the other three countries – which included pictures – exhibited good welfare standards. Without direct connection to a regulatory body or government department however, it makes validation by GA for compliance purposes difficult.

3. Industry Compliance Requirements

A number of important export host countries remain non-compliant. While GA is likely to withhold passports for greyhounds destined for these countries, it acknowledges that this alone will not ensure that greyhound exports are suspended to these jurisdictions. While GA continues to work with the Federal Government to strengthen compliance with the Greyhound Passport Scheme, it will also work with non-compliant countries on achieving acceptable welfare standards.

Part of the problem with the compliance rates in a number of jurisdictions stems from the inadequate regulatory status of racing in those countries. Generally, countries which possess a centrally regulated industry have a higher compliance rate than those that do not. GA has more confidence that agreed welfare standards will be effectively enforced in countries where greyhound racing is regulated. In countries where this framework does not exist, the onus will be firmly on the racing institutions within the country to prove to GA that compliance standards are being met. Such

compliance will need to be rigorously assessed on a case-by-case basis and may involve reassessment for each passport application.

Given the lack of a centrally organised industry in the presently unregulated jurisdictions of China, United Arab Emirates, South Africa and Japan, GA has found reviewing their compliance levels against required export standards challenging. Although anecdotal evidence shows that some of the major racing facilities in these unregulated countries are well maintained and still operate in the absence of an effective program of compliance, passports are not likely to be issued by GA for Australian greyhounds targeted for export to these jurisdictions.

3.1 Macau

The regulated region with the lowest adherence to compliance is Macau which has been assessed by GA as not fully compliant against its export welfare standards. GA suspended the receiving and processing of passport applications to Macau in March 2013 after an assessment of Macau's responses to GA's self assessment questionnaire. GA intends to work with Macau administrators on a program aimed at reaching full compliance.

Macau visit to Australia

The Macau Canidrome's General Manager and Chief Veterinarian visited Australia in July 2012 to share information with GA's CEO and GRV's Animal Welfare Manager regarding the establishment of a Greyhound Adoption Program (GAP) for retired racing greyhounds. Macau delegates wanted to demonstrate to GA what processes and financial commitment the Canidrome and Macau Government had in place to progress such a program.

GA took the opportunity to discuss Macau's response to GA's self-assessment questionnaire in detail. The Canidrome representatives indicated they were committed to enhancing its animal welfare standards with both parties agreeing to a program of rectification measures with the aim of bringing the Canidrome up to an acceptable level of compliance.

Macau delegates also took part in a tour of Victoria's GAP facility in Seymour where they spent several hours discussing adoption policy and practices with the State Program Coordinator - knowledge that would assist in the development of an external adoption program in Macau.

Australia visit to Macau

Following the Macau Canidrome personnel visit to Australia, a delegation of industry experts from Australia visited the Canidrome during October 2013. The delegation included GA's CEO and the Animal Welfare Manager of GRV.

The purpose of the visit was to validate the welfare standards enforced at the Canidrome against Australia's documented standards for countries seeking to import Australian greyhounds, as well as to authenticate Macau's responses to GA's export self-assessment questionnaire.

GA believes that a system of allowing Macau to reach near full compliance before allowing passports to be issued is the most appropriate way forward. This would involve Macau demonstrating close to full compliance and implementing a credible program of activities to reach full compliance before passports would be issued. Such compliance will also need to be independently verified at that jurisdiction's cost.

3.2 New Zealand, Ireland, United States

For countries which are assessed as being close to fully compliant, GA will continue to issue passports to owners seeking to export greyhounds to these host countries. GA does however, reserve the right to withdraw passports should the meeting of full compliance appear problematic.

For these jurisdictions, GA does not believe it is appropriate or necessary to perform site visits at this time in order to verify compliance but will continue to monitor their compliance by way of an annual self-assessment questionnaire.

3.3 Vietnam

Vietnam remains non-compliant as it has refused to engage in the self-assessment questionnaire process. GA will not be investing resources in assisting Vietnam to reach a state of compliance, as it has indicated it will not be sourcing any greyhounds from Australia. Passports will therefore, not be issued for greyhounds destined for Vietnam.

PART D

Macau Site Visit

1. Background

Following GA's August 2013 meeting it was agreed that the CEO and GRV Animal Welfare Manager would undertake a site visit of the Macau Canidrome. The delegation's brief was to:

- *Discuss with the Canidrome Management the reasons for an interim ban on the issuing of greyhound passports to Macau taken in March 2013 as a result of GA's desk top assessment of Macau as not fully compliant .*
- *Validate the GA desk top analysis including viewing the Macau Canidrome Adoption Program, auction of newly arriving race dogs, racing, track surface and its preparation, on-site veterinary facilities, housing and kennels as well as obtaining a greater understanding of the Canidrome operations.*
- *Agree on process and timing to rectify current deficiencies.*
- *Physically assess, inspect, report and further recommend a position to the GA Board based on a further assessment of GA's standards for countries seeking to import Australian greyhounds.*
- *Assess if rectification of deficiencies is realistically possible, and if so, in what time frame.*

The purpose of this visit was to validate the animal welfare standards provided to Australian greyhounds at the Macau Canidrome against Australia's documented standards for countries seeking to import Australian greyhounds. The visit would also clarify and authenticate the responses given by the management of the Macau Canidrome to GA's export self-assessment questionnaire.

Through GA's desktop analysis, completed in December 2012, Macau was identified as currently not fully compliant with GA's export standards. Particular areas of concern were:

- *Track maintenance processes and procedures*
- *Provision and maintenance of a safe racing environment to minimise the risk of injury*
- *Injury rates and seriousness to minimise the need for euthanasia*
- *Kennels*
- *Policies and initiatives to extend the racing life of a greyhound*
- *Long-term strategy and commitment towards advancement of an external GAP program*
- *Isolation of sick or injured greyhounds from healthy greyhounds*

2. Observations

2.1 General

Macau is two small islands that are very densely populated. Most of the main island is built up with high-rise apartment blocks – there are no single storey homes or houses. Housing is quite expensive, even in the older areas of town (further away from the newer casino areas). Macau residents live in multi-storey apartment blocks (of varying age and condition) with most coveting a small wire/metal balcony attached to the outside of their unit. Even in the newer and more affluent areas, the apartment blocks are closely sited to each other and there is very little open space or public land anywhere in Macau. Most apartments are small two bedroom apartments, which house an entire family, so space is at a premium.

The Cotai Strip, an area of reclaimed land to the south of the main island, is home to a number of very large, modern casinos, and Macau's population is swelled each day with visitors coming specifically to gamble at the casinos. Macau has a population of around 600,000, but it is estimated

that around 500,000 tourists visit every day - mostly from mainland China where gambling is illegal. Macau is a 24 hour a day city, with most shops not opening until 10am or 11am, but staying open through to midnight.

Dog ownership appears to be similar to places such as Hong Kong where smaller breeds of dog are kept as pets, housed within the apartments. In Macau you see a number of poodles, miniature schnauzers, and maltese/shih tzu type dogs but very few medium to large breed dogs, and those you do see are street dogs (un-owned, un-neutered, roaming the streets). Macau has a number of 'shelters' and rescue groups that handle unwanted pet dogs, and from the information we were given these shelters are quite full.

The weather in Macau is tropical with temperatures varying very little from day to night. During the wet season there are regular monsoonal rains, and this combined with the humidity leads to deterioration of the building facades with cracking, mildew, rust and peeling paint being seen on buildings across the city.

2.2 Political

The Canidrome's Chairman is one of the richest and most powerful men in Macau, Dr Stanley Ho. Dr Ho has multiple interests in the many casinos across Macau and in other countries and has estimated net assets of around 400 billion.

The General Manager of the Canidrome, Mr. Stanley Lei, also has strong government connections. Mr Lei led the political campaign for one of his directors who was recently re-elected to government.

Macau, whilst looking old and poor, has a government that is extremely wealthy. They have an unemployment rate of about 2 per cent, the economy is billions of dollars in surplus, government provides free medical treatment and education, and over the past 10 years has given a monetary bonus to every Macau resident regardless of how old, rich or poor they are.

The Macau Government fully supports greyhound racing and the operation of the Canidrome, despite its contribution to the Government income being very small in comparison to casinos. The Government owns and operates the sports field that is located within the centre of the track (the Canidrome does not own this land) and there are a number of Government buildings located within the same block around the edge of the Canidrome track.

There are very tight rules in relation to the operation of the race meetings with Government officials present on site during the kenneling process and the conducting of the race meeting. Government Veterinarians are also involved if a greyhound requires euthanasia. The Canidrome vets must gain government approval before euthanising.

2.3 Cultural

The Canidrome facility is one of the few open spaces in Macau and the area inside the track contains a soccer pitch and an athletics track. There is also a sports facility located at the beginning of the home turn. The facility is used for major football events and all of the local schools use the facility as their sporting ground. The sports facility is in almost constant use.

The Canidrome celebrated 50 years of operation in September 2013. When the Canidrome was built it was sited at the end of the urban area and photos from 50 years ago show very few buildings located anywhere near the facility. Today, the Canidrome is located amongst dozens of high rise

apartment blocks located around approximately two thirds of its perimeter with a large hill located at the back of the track being the only side not built up. Urbanisation has meant changes to how the Canidrome operates. For example, there is no on-course announcements or race calls due to noise.

The Canidrome is a major employer with around 130 full time staff, many having worked there for their entire working life. There is very clear demarcation of duties with each employee having a specific role. They have trainers responsible for each kennel block, kennel staff who undertake the day to day care of the greyhounds, track staff, veterinary staff, as well as the staff involved during race meetings. Kennel staff work a split shift doing morning kennel duties, returning for afternoon kennel duties and the race meetings at night.

2.4 Racing

The Canidrome races five nights each week with each meeting having 18 races. Each race consists of six dogs, and races are timed at 15 minute intervals. They race 52 weeks of the year and racing is only cancelled during high category typhoons where all of Macau is shut down. Off course wagering provides the majority of the betting pools although there is still on-course wagering for those who come to watch the races. Any changes to the programming must be authorised by the Government.

The track has three distances. Two have roll-on/roll-off starting boxes and one has fixed starting boxes. The track has two parallel straights with quite tight turns at either end. The catching pen is located on the first corner. Despite the apparently tight corners, the greyhounds appear to handle them well, although it was not uncommon for greyhounds to race very wide on the home straight. There is no possibility of the track shape being able to be modified due to the other land uses both inside and outside the track.

Track preparation is largely a manual process, with staff hand hosing the surface, and hand-smoothing the surface. The Canidrome does use a tractor to prepare the track prior to the race meeting but due to the very tight inter-race intervals, there does not appear to be time for the tractor to be used in between races as it is used in Australia. When the track sand gets 'hard' it is harrowed to break the surface and then watered again just prior to the race meeting.

Kenneling is very similar to in Australia with dogs weighed and vet checked prior to being locked into the racing kennel block. Government officials are involved in kenneling, both checking ear brands and in controlling the race kennels. Kenneling takes place about 4pm for a 7.30pm race meeting so dogs are kenneled for much longer than in Australia. The race kennels are air-conditioned. Due to government controls, GA delegates did not have the opportunity to inspect the race kennels.

Prior to each race the handlers collect their greyhounds and they are once again checked by both the government official (ear brands) and vet. Tapes and bandages are applied by the trainer. Dogs then enter the parade ring, before being escorted by a steward as they parade down the home straight. They stop a number of times during the parade and are 'introduced' prior to heading to the boxes. After the race, they are collected and paraded back past the grandstand (winners at the front) before heading back to be hosed down.

Swabbing occurs in the same manner as Australia, with samples being processed by Racing Analytical Services Limited (RASL). Trainers returning a positive swab are reported to the Government and are liable for criminal charges (not just suspension).

The GA delegates saw one serious injury during their visit, with a greyhound suffering a compound fracture of the foreleg at the first turn. Track staff were quick to immobilise the dog and it was then stretchered immediately to the vet room for assessment. Given the nature of the injury, the

greyhound was euthanised, but this could only take place after x-rays and photos were taken and sent with a written report to both the owner and the government vet.

Security is very tight at the meetings with Government officials working on the concourse, in the kennel area, and in the Stewards tower.

2.5 Day to Day Management of Greyhounds

The Canidrome has all of its greyhounds housed on-site in kennel blocks. Each trainer has control of a kennel block and these are separated from each other by solid walls. Each kennel block has 80-100 kennels. The kennels are arranged around the four sides of a central courtyard area. The blocks are all two storey, with ramps leading from the ground floor to the upper floor on either side of the courtyard. Construction of the kennels is almost entirely concrete and metal. Each individual kennel is numbered and has a raised bed with some bedding (most had a hessian sack). The entire facility can house up to 900 greyhounds. At the time of GA's visit, there were approximately 700 greyhounds on site.

There are eight kennel blocks in total with one larger block being assigned to newly arrived dogs, dogs in pre-training and the adoption program dogs. This block had a number of kennels that had been enclosed with plastic sheeting to create an air-conditioned kennel area for dogs that were unwell or who were not coping with the heat. These air-conditioned kennels were also used for dogs coming back from racing to assist with cooling.

There is one greyhound housed in each kennel, with a wire/mesh kennel door allowing for both air and light to enter. Each kennel had a bed and a water dish. The kennels are 50 years old and appear dark and uninviting but were clean and cool. From information provided by the Canidrome and viewing these kennels, two thirds would fail to meet the minimum size for a racing kennel in Australia. Canidrome kennels are 2.6m² compared with Australian minimum standard of 3m². There were no 'runs' or outdoor yards for exercise. Each kennel block has a sprinkler system installed where trainers can activate the water spray to cool the kennels down. The affect of direct sunlight on the upstairs kennels was mitigated by additional shade provided by overhanging eaves and shade sails. Many of the greyhounds chose to lie on the concrete floor of their kennels (probably as this was cooler than the bed).

Each trainer employs a number of kennel hands. The staffing ratio is one kennel boy to approximately five or six greyhounds which is superior to the GA Code of Practice requirement of 1 to 25 in Australia). Kennel hands are responsible for cleaning the kennels and exercising and caring for the greyhounds. Each day, greyhounds are walked on the track (being the only place on the property where the dogs can be exercised) in the morning and at night. Greyhounds get one or two laps of the track depending on the directions of the trainer and, while most 'empty out' on the track, there was not an overpowering smell of excrement. GA delegates were told that all solid matter is removed and the watering of the track assists with dispersing the urine. Once a week a disinfectant spray is used on the track to keep it clean.

Each kennel block had a food preparation area, bathing facilities, and space for treating animals. All of the Canidrome greyhounds are fed a premium dry food imported from England. The feed store is separate to the kennel blocks and is temperature and humidity controlled to prevent spoilage of the food. Each trainer is given a day's worth of food at a time to prevent wastage. In addition to the dry food, the Canidrome also has chicken meat, eggs and milk powder which are added when needed.

Veterinary services at the Canidrome are located in a clinic on site. The Veterinary Clinic has three full time staff and has recently been upgraded. The facility is air conditioned, bright and clean with plenty of natural light. Onsite facilities allow taking of radiographs (x-rays), surgeries, and general

examination of the greyhounds with a variety of equipment. Treatment books are kept for each greyhound with written examination and treatment instructions clearly recorded. Instruction sheets are given to the trainer when the greyhound requires ongoing treatments and include pictures, diagrams and written instructions. There is no 'cost' to the trainer for visiting the vet, so injured dogs are all taken to be examined.

Dogs requiring ongoing therapy for injuries are required to come to the veterinary area during race meetings for booked sessions where the veterinary staff monitor and ensure that treatments are being applied properly. There is a room dedicated for this purpose with a variety of equipment and space for greyhounds to be treated. The concept of compulsory treatment sessions is aimed at ensuring that all injuries are treated as well as they can be so that dogs can recover and return to racing, rather than being removed from the racing population or being euthanised. There is also a swimming pool that is used for exercise and recovering greyhound treatment.

Greyhounds new to the Canidrome first enter the pre-training kennels for assessment. Once they have settled in, they undertake timed/recorded trials prior to going to auction. During the auctions, owners can purchase a greyhound with the prices varying based on the trial times and the breeding of the dogs – the owner will then assign the dog to one of the trainers. Dogs not purchased remain owned by the Canidrome itself, and are placed with trainers who have less dogs than the others. The ongoing cost of owning a greyhound is relatively cheap – with the weekly training fee (includes food, veterinary treatments, board and training) being around AU\$15.

Greyhounds generally race once a week. If they don't race, they will be trialed to maintain their fitness. Similar to Australia, there are a variety of grades and distances and there is a limit to the number of dogs each individual trainer or owner can have in one race. Generally the standard of greyhounds sent to Macau is not very high and many look to have had prior injuries despite being currently sound. The Canidrome management cannot add extra tiers of racing or grades without government approval but utilise a system where their lowest grades have sub-grades to allow slower dogs the chance to continue to race.

2.6 Post Racing

The Canidrome has recently started an Adoption program loosely based on the Australian GAP program. Greyhounds are imported under a 'working dog' license, and as such are not allowed to be pets in Macau. The Canidrome has lobbied their government to allow greyhounds to be tested for a 'pet license' to allow them to then be placed as pets within the community.

At the end of a greyhound's career, its owner decides on what will happen to the greyhound. Some continue to pay their kennel fees and the dogs are simply housed at the Canidrome until old age – GA delegates met a number of these elderly residents during our visit. If the dog has chronic injuries, the owner may apply to have the greyhound euthanised, but this is subject to a Government veterinary examination and approval. The government vet has to perform the euthanasia.

With the development of the Adoption program, there is now the option to assess the greyhound's temperament and reaction to other dogs and people, and subsequently have it tested by a Government official for the granting of a 'pet dog' license. The Canidrome has a number of greyhounds currently undergoing this process. They have also purchased two testing dogs (a Boston terrier and a mid-sized mixed breed dog).

So far two dogs have undergone government assessment, and four more are in training – but no dogs have actually been adopted by the public. This may be due to the lack of clear information about the opportunity available on the Canidrome website at the time of GA's visit, or may be due to the fact that owning a greyhound in Macau would not be very easy given the living conditions.

Delegates asked about the ‘advertising’ of the program and although there has been some local press, there have only been a few enquiries.

We also discussed other adoption options – such as adoption into mainland China (where there is more space for ownership of a dog). The Canidrome Management is aware that the lack of program size is an issue for them and have discussed purchasing land in mainland China for a retirement kennel.

3. Conclusion

The GA delegates that visited Macau find it extremely difficult to be overly critical of the greyhound racing operations in Macau. Thanks to the dedication of their head vet, who has a passion to do the best he can for their animals, the Canidrome has made many improvements to their practices, processes and procedures over many years which have directly contributed to better facility management and greyhound welfare outcomes.

Although GA acknowledges those significant improvements and note that this jurisdiction is compliant with their own Government regulation and oversight, there are still a number of deficiencies when assessed against the GA “Standards for Countries seeking to import Australian Greyhounds”.

In determining the appropriate resource allocation to ongoing Canidrome support, the GA Board will need to decide what level of improved compliance should be expected and in what reasonable timeframe.

The GA delegates recommended that major improvements could be made in the following areas:

- **Track Preparation and Maintenance**

The maintenance and preparation of the race surface can improve. The track surface appears to be too dry and too hard most of the time and the manual methods of preparing the racing surface is likely to lead to inconsistent race surfaces. The purchase of a modern tractor to maintain the surface before, during and after races, rather than using manual labor would improve surface consistency.

It is not possible for the track shape to be altered.

Two copies of the GRV Track Maintenance manual were provided to Canidrome management during GA’s visit but they would benefit greatly from some consultation sessions with an experienced and practical track expert who could assist them with developing track preparation protocols that takes into account Macau’s unique weather and race day schedule requirements. The expert could also advise on the correct equipment required to achieve a consistent race surface. Canidrome staff were open to this suggestion.

- **Housing & Kenneling**

GA recommends that the Canidrome commit to a programmed upgrade of their kennel blocks – similar to the upgrading of the veterinary clinic that has already taken place.

The housing conditions, although practical and clean, are dated and worn. Many of the kennels are smaller than required under Australian Codes of Practice and although GA cannot impose regulations on another country, we would encourage the Canidrome management to schedule a program that would see each kennel block upgraded over a set time frame with improvements to ventilation, climate control, increased natural light and space for each greyhound.

- **Information Availability**

Many of the claims about the Canidrome are inconsistent with the evidence drawn from GA's visit. Although the Canidrome management is not concerned about answering to these claims (they feel they only have to answer to their own government), they may benefit by declaring their improved welfare practices on their website.

Information about their adoption program, the dogs available, information about the veterinary care the dogs receive, and information about other initiatives relating to the welfare of the greyhounds could be made available via their website – in both Chinese and English.

Currently the Canidrome, via the Government, publish injury, euthanasia and importation data but these could also be better explained or presented so that someone with little knowledge of racing, but interested in greyhound welfare, could be better informed. For example, it has been reported in the press that Hong Kong's Department of Agriculture, Fisheries and Conservations advised that 110 greyhounds have been imported to Macau as at the end of August 2013, compared with 248 in the same period to last year, and 228 in the first eight months of 2011. Macau management confirmed that this was accurate and that the reduction was due to improved injury management practices, leading to reduced euthanasia numbers.

- **Control**

If Macau approached full compliance and GA was to resume the issuing of passports to Macau, GA may seek agreement with the Canidrome management that all greyhounds travelling to Macau MUST have a valid GA passport prior to export and that the Canidrome will not accept any greyhound that does not have a valid passport. This would help GA improve lifetime tracking of greyhounds - an important contributor to improved greyhound welfare outcomes in Australia.

- **Injury Rates**

In July 2012 Macau management confirmed that close to 50 per cent of their racing stock were euthanised each year due to serious injury. Based on Department of Agriculture import data, this is likely to be closer to 30 to 40 per cent in 2013. This figure is still alarmingly high and GA will be very keen to see this number decrease substantially further with the introduction of improved track protocols.

- **Exercise**

Macau does provide alternative forms of exercise such as swimming, but from observations, GA does not believe the amount of daily exercise provided is sufficient for optimal welfare outcomes. Greyhounds could be exercised via swimming, grooming, massage or other means like using the bull ring or walk around other sections of the facility.

- **GAP Program**

GA delegates observed the development of a good adoption program but were concerned about the extremely low number of greyhounds likely to be adopted. A well resourced campaign to educate and promote greyhound ownership would help the program achieve its quality aims. In the first instance, information about their adoption program and the dogs available, should be made available via their website – in both Chinese and English.

Before GA considers the removal of the current passport ban, the Canidrome would need to demonstrate close to full compliance and provide documented timeframes for longer-term projects. Any decisions or determinations made by the GA Board need to be communicated clearly with the Canidrome Management, allowing them time to discuss plans to address or rectify the issues, and providing them with the opportunity to consult with people who can assist them with real solutions.

PART E

Industry Export Roles

1. Government's Role in the Export of Australian Greyhounds

The export of Australian greyhounds is governed by the Commonwealth *Export Control Act 1982*. This Act is governed by the Department of Agriculture and is administered by the Biosecurity Unit located within the Department. The greyhound racing industry operates within the framework of this legislation to aid efforts to further regulate the export of greyhounds.

Under the Act, an Export Permit and a Health Certificate are required for the export of all live animals from Australia, which for this purpose, is defined under section 3.02 of the *Export Control (Animals) Order 2004*:

3.02 Definitions for this Part

In this Part:

live animal means:

- (a) a warm-blooded animal intended to be exported alive; and
- (b) if an importing country requires certification by a government agency of the exporting country in relation to any matter about an animal proposed to be exported — the animal intended to be exported alive.

port includes an airport.

voyage includes a flight.⁷

The process for exporting live animals by sea or by air differs slightly. Normally, live stock are exported by sea and companion animals by air, which is due to the fact that companion animals are often of high value and are therefore usually exported in small numbers. Common examples of companion animals as listed by the Department of Agriculture include:

- Cats and dogs
- Race horses being exported either for competition or breeding
- Native animals being exported for zoological purposes.

The administrative steps in the process of live animal export, that is, of animals which are not considered live stock are as follows:

- The exporter gives the Secretary (or an authorised Department of Agriculture Biosecurity officer) a Notice of Intention (NOI) to export the live animal (if the importing country requirements require the animal to be held at registered premises before export, the NOI also acts as a request to approve, as registered premises, the premises at which the animal will be prepared for export)
- The animal is treated and tested in accordance with the importing country's requirements
- The animal is held in pre-export quarantine or isolation at the premises in the way that, and for as long as, the importing country requires
- A Department of Agriculture Biosecurity authorised officer prepares a health certificate for the animal if the importing country requires one
- The animal is loaded and the health certificate and export permit are issued to the exporter.

Each step in this process is conditional upon all of the previous steps having been properly carried out. The export of live animals is prohibited unless an export permit is issued, as required under the *Export Control (Animals) Order 2004* (see section 3.02 above).

⁷ *Export Control (Animals) Order 2004*, Part 3, section 3.02, p 32

Dependent upon the animal that is being exported, permission may also be required under other Commonwealth laws. For example, in the case of a native animal, a permit may be required under the *Environment Protection and Biodiversity Conservation Act 1999*. Many countries also require that animals receive treatment/testing/vaccination in Australia before they are eligible for export to the destination country; all countries require that live animals receive a final veterinary inspection before export. Department of Agriculture Biosecurity provides a useful checklist (refer Attachment G) for all potential Australian animal exporters which outlines what is required to progress the export of the live animal.

The main focus of this process is to ensure that the animal is 'fit for export' and that all destination county quarantine and import requirements are met. Beyond the immediate health of the companion animal, the process has no regard for the future welfare of the animal, including once it arrives at its destination.

2. GA's Role in the Export of Australian Greyhounds

GA monitors the export of greyhounds on behalf of its members through its Garr's mandated by the GA Board. As outlined in Part A above, GAR 124 stipulates that any person exporting a greyhound(s) to another country must obtain a greyhound passport prior to meeting the requirements of Department of Agriculture Biosecurity.

GA initially introduced the Greyhound Passport Scheme to support its national animal welfare initiatives. The passport provides GA with valuable information on the number of greyhounds being exported, the reason for export, and the destination country.

If a registered industry participant exports a greyhound without applying for a passport through GA, state and territory control bodies have the power to subject the participant to inquiry and potential sanction. Beyond this measure, GA members currently have no other power to ensure compliance with its export passport scheme.

While the passport scheme provides a solid framework for the reasonable control of exports, it does not have the ability to sufficiently assess the welfare standards adhered to by host countries and lacks a policy position from GA on how it will manage exports to such jurisdictions. Most importantly, however, it lacks regulatory backing meaning that even if GA withholds a passport, there is no guarantee that the animal will not be exported.

A list of potential risks and mitigation strategies associated with greyhounds exported from Australia can be found at Attachment H.

3. Current Gaps in the Australian Greyhound Export Process

Both the Federal Government process for companion animal export and GA's passport system fall short in terms of limiting the export of greyhounds to countries with inappropriate welfare standards. While the current government regulatory system is sound in regard to ensuring that only healthy greyhounds are exported and meet the import standards of the host country, they do nothing to guarantee these jurisdictions comply with minimum welfare standards. Equally, while the GA Greyhound Passport Scheme ensures that passports can be obtained for sanctioned exports, the Scheme currently does nothing to ensure host countries uphold minimum welfare standards, nor does it have total population coverage. In summary, anyone can currently export a greyhound without a GA passport.

While GA is in discussions with the Federal Government regarding the problem of exporting greyhounds to unsuitable countries, it has limited ability to influence the development of necessary regulatory backing for its Greyhound Passport Scheme. Ideally GA would like to move towards a system where only countries officially sanctioned by GA are approved for the import of Australian greyhounds; however it understands that this is not an easy regulatory change. GA is therefore, committed to working with government to achieve this outcome while continuing to do all it can from a self-regulatory standpoint to increase passport compliance.

This review has provided GA with an initial assessment of the level of compliance with welfare standards by Australia's key greyhound export jurisdictions. As a further result of undertaking the review, it also provides recommendations on how ongoing compliance against these standards can be adequately assessed, as well as options for non-compliant countries to meet the standards over time. While this is an important step in the identification of problem export jurisdictions, it will have little impact if compliance with the Greyhound Export Passport Scheme cannot be effectively enforced. To that end, this report makes a number of recommendations to the GA Board that will assist with the strengthening of the passport system.

While it is true that GA is unable to control the export of all greyhounds, it is reasonable to expect its members to be able to regulate the export of greyhounds by industry participants. At present, the only avenue for GA members to enforce GAR 124 is by way of a steward's inquiry and potential sanction for non-compliance. Given that the price offered for Australian greyhounds overseas is increasing, it is important that GA members impose sufficient sanctions under their regulatory powers to act as an effective deterrent. It may well be the case however, that sanctions will not be sufficient to ensure compliance with the GA passport scheme. This is because it is impossible for GA and its members to adequately police the export of greyhounds without passports. By way of example, greyhounds could simply be exported by individuals who are not licensed by industry.

CONCLUSION

1. Summary

This review of greyhound export welfare standards has been an extremely useful exercise for the Australian greyhound racing industry. It has provided the industry with new insight into Australian greyhound exportation and, in particular, where improvement is required both here and in host countries, to optimise welfare outcomes. For the first time the size of the export industry has been quantified, and the main destination countries identified. On the back of the first official review of welfare standards in key destination countries, a new compliance regime has been proposed.

The problem of monitoring and regulating the export of Australian greyhounds was reviewed and the roles of the various industry and government stakeholders identified. This has enabled GA to begin a process it hopes will allow better management of the export market for Australian greyhounds and improved control and reporting of greyhound export information, including movements overseas.

The export market for Australian greyhounds is relatively small. Based on available data from Department of Agriculture Biosecurity, there were 703 greyhounds exported in 2011. Nonetheless community concern surrounding welfare standards in certain export host countries remains one of the most significant issues facing the Australian and wider greyhound racing industry. According to the Department of Agriculture, in 2011, the vast majority of exported greyhounds went to either New Zealand (272) or Macau (309). While New Zealand was assessed in this process as being close to fully compliant with the Required Standards for Countries Seeking to Import Australian Greyhounds, Macau was assessed as being non-compliant across a number of key areas.

Macau was a particular focus of this review and warranted a site visit by Australian industry representatives to view, first hand, the Canidrome's greyhound welfare performance. While significant improvements had been found to have improved welfare outcomes over several years, GA recommends further major improvements to track preparation and maintenance, kennelling, information availability, control (via a mandatory GA passport for import purposes), exercise rates and the knowledge and promotion of the local GAP. Many of these should lead directly to reduced race injuries and reduced rates of euthanasia. Any future lifting of the current ban on issuing passports to Macau will be based on the Canidrome's demonstration that they were close to full compliance with GA's standards.

The future assessment of compliance against greyhound welfare standards in export host countries is a core focus of this report's recommendations. Key to this is how GA and the greyhound racing industry can increase compliance rates against the welfare standards as well as accurately assess such compliance.

This report makes recommendations in the area of exportation to unregulated jurisdictions, particularly related to compliance with GA's standards. The aim is to ensure that only greyhounds with a suitable passport are exported to these countries and that these are only issued when compliance can be fully assessed and accurately verified.

Finally, the report has reviewed the roles of industry participants, state greyhound associations, peak bodies and government in better regulating greyhound exports. The report concludes that the greyhound racing industry can only go so far in better regulating greyhound exports and that support of the Federal Government is required. GA therefore recommends a partnership approach be adopted by industry and government to ensure that greyhound welfare becomes a core criteria when assessing the suitability of all Australian greyhounds for export.

2. Detailed Recommendations

DOCUMENT PUBLICATION

Recommendation 1

GA recommends that, once endorsed by the GA Board, the final report into the Review of Australian Greyhound Export Welfare Standards be publicly available on its website.

While a comprehensive review and report, the GA Board's endorsement of it is insufficient to generate wide stakeholder acceptance of its findings and recommendations. The report should be widely available to industry stakeholders to encourage discussion and debate. It is also important to have the report widely available to continue educating industry participants about the industry's expectations of them.

Recommendation 2

GA recommends that GA's "Required Standards for Countries Seeking to Import Australian Greyhounds" be made publicly available on its website.

The development of GA's Required Standards is a core outcome of this review, are referred to liberally throughout the report, and it is important that they are widely publicised.

GREYHOUND PASSPORTS

Recommendation 3

Where the export host country is close to fully compliant with GA's Required Standards for Countries Seeking to Import Australian Greyhounds, GA recommends that passports continue to be issued for greyhounds that are to be exported by licensed persons for racing, breeding or pet purposes.

Required Standards for Countries Seeking to Import Australian Greyhounds may conflict with the local laws, regulation or rules governing the operations within the host country's greyhound racing industry. Therefore, GA needs to apply appropriate discretion as full compliance may not be possible in some cases. An important consideration is whether the country is achieving the greyhound welfare outcomes GA is seeking, albeit not in strict compliance with the required export standards.

Recommendation 4

GA recommends that national guidelines be established regarding potential sanctions for industry participants who do not adhere to the Greyhound Passport Scheme.

Compliance with GAR124 is mandatory. Further guidance to Controlling Bodies on appropriate type and range of sanction for non compliance is appropriate to ensure the sanction achieves acceptable deterrence and punishment objectives. The range of sanctions would include:

- Monetary fines, suspensions or disqualifications for industry participants who export greyhounds without complying with GAR 124; and/or
- Warning off for industry participants who continue to export greyhounds without complying with GAR 124.

Recommendation 5

GA recommends continuing the suspension of receiving and processing of passports to Macau until that jurisdiction is assessed as close to fully compliant or fully compliant with GA's Required Standards for Countries Seeking to Import Australian Greyhounds.

GA suspended the receiving and processing of passport applications to Macau in March 2013 after an assessment of Macau's responses to GA's self assessment questionnaire and after verification of those responses during the Macau representatives' visit to Australia. Macau is currently not fully compliant and the suspension of passports should be retained until welfare outcomes improve in line with GA's Required Standards and as a result of GA's support of Macau to reach those standards.

This recommendation confirms that the suspension of receiving and processing of passports to Macau should remain in place until that jurisdiction makes significant, measurable welfare improvements.

UNREGULATED COUNTRIES

Recommendation 6

As a default position, GA recommends that no greyhound passports be issued for greyhounds which are to be exported for racing, breeding or pet purposes to countries where GA has no formal association with a recognised central regulatory authority.

These countries are considered by GA as unregulated jurisdictions and the lack of formal ties is predominantly due to there being no formally sanctioned greyhound racing industry.

Recommendation 7

GA recommends that issuing greyhound passports for greyhounds which are to be exported for racing, breeding or pet purposes to countries where it has no formal association with a recognised central regulatory authority should be considered on a case-by-case basis; and only issued when the passport applicant can satisfactorily prove that the unregulated country complies with GA's Required Standards for Countries Seeking to Import Australian Greyhounds. GA further recommends that the NRR be updated to ensure greater compliance with GA's Greyhound passport scheme as it relates to unregulated countries.

As a first step, the export agent in all host countries must complete GA's self-assessment questionnaire with the purpose of providing satisfactory information to assist the GA Board in determining whether or not they support the export of Australian greyhounds to the applying jurisdiction. Until this information is supplied and GA is satisfied that animal welfare concerns are satisfactorily addressed, GA will not issue a greyhound passport for the export of a greyhound to this country.

It is also envisaged that further verification activities will need to be undertaken in order to validate country compliance. These activities will likely include independent verification of responses to the questionnaire as well as all potential work plans.

GOVERNMENT ENGAGEMENT

Recommendation 8

GA recommends continuing its work with the Federal Government, including the Department of Agriculture Biosecurity, in order to foster international government relationships with export countries.

GA's Greyhound Passport Scheme is an industry regime and does not have the regulatory backing of law in Australia, or the official sanction of the Federal Government, to support it. As such, GA cannot enforce export countries to comply with its Required Standards for Countries Seeking to Import Australian Greyhounds, nor can it make the completion of an export standards self-assessment questionnaire or other compliance activities mandatory. This is an acute problem with host countries that do not have formally sanctioned greyhound racing programs or where sufficient information is not available to make the assessment. International government regulation that made it mandatory for Australian exporters to comply with GA's passport scheme would close much of the gap between the scheme and current national and international regulation.

Recommendation 9

GA recommends continuing its work with the Federal Government, including Department of Agriculture Biosecurity, in order to explore the option of it providing regulatory support for GA's Greyhound Passport Scheme.

GA acknowledges the process of legislating the Greyhound Passport Scheme is not a simple one. It also understands that the powers provided to Department of Agriculture Biosecurity are currently insufficient to enable enforcement of the Scheme. However, GA believes that the only way greyhound exports can be effectively controlled is by applying population-wide rules and sanctions.

As this report highlights, the GA Greyhound Passport Scheme cannot be enforced outside of the Australian greyhound racing industry, leaving the way open for non-compliant exports. GA believes that in order to maintain community support for greyhound exports, welfare standards need to be applied to all greyhound export processes, not just those which are facilitated through the greyhound racing industry. GA is therefore keen to continue to work with government to explore regulatory options to increase compliance with the industry's export passport scheme.

Such communications will further ensure GA receives up-to-date data on actual greyhound exports as recorded by Department of Agriculture Biosecurity for use in monitoring compliance with its Greyhound Passport Scheme.

COMPLIANCE

Recommendation 10

GA recommends that the GA Board review the agreed Required Standards for Countries Seeking to Import Australian Greyhounds annually to ensure they continue to meet the expectations of both industry and the community.

Ongoing annual reporting is an important step in maintaining compliance against export animal welfare standards. Not only does it ensure host countries continue to be monitored, it also

reinforces GA's commitment to the issue of animal welfare. This program will also include host country reporting on any make-good compliance programs agreed to.

Recommendation 11

GA recommends that further support is sought from host countries that meet GA's export welfare standards to protect greyhound welfare by encouraging these countries to refuse to register any greyhound which is imported from Australia for racing or breeding purposes that has not been issued a greyhound passport.

If countries are prepared to support GA by way of enforcing its welfare standards and a Memorandum of Understanding (MOU) can be reached, GA should reduce the applicable passport fee.

The MOU will need to involve a letter of reply to GA indicating that the export host country is prepared to observe GA's Greyhound Passport Scheme requirements and supports responsible greyhound welfare initiatives.

Recommendation 12

GA recommends that all Australian greyhounds exported to New Zealand be subject to compliance with GAR 124, given the time lag and loop hole with the non-tracking of unnamed greyhounds to this country.

Greyhound Racing New Zealand is a member of GA however it is recommended that dispensation be given for payment of the passport fee for greyhounds being exported to this country. Notwithstanding the dispensation recommendation, the actual fee will be agreed jointly by GA and Greyhound Racing New Zealand.

3. Review Outcomes and Next Steps

The GA CEO is seeking approval of the 12 recommendations contained in this report by the GA Board and that appropriate resources to implement the recommendations and undertake further audit and compliance activities be allocated. GA is also seeking approval to further discuss the results of the review outlined in this report with the Department of Agriculture's Biosecurity Unit.

Once board approval is attained, GA will prioritise further work with Macau to progress a plan for Macau to reach full compliance. This will involve undertaking the assessments made in Part D of this report.

GA will assess the export host countries not covered in this review for compliance with GA's Required Standards for Countries Seeking to Import Australian Greyhounds when it receives a passport application for one of these jurisdictions.

REFERENCES

Attachment A: Australian Greyhound Health and Welfare Standards

INTRODUCTION

Greyhounds Australasia (GA) is the national body for the greyhound racing industry in Australia and New Zealand. GA comprises representatives from the controlling bodies in all Australian states and territories as well as New Zealand (the GA Directors). The role of GA is to promote a holistic approach to the Australian greyhound racing industry and many of the challenges it faces. GA's aims are to support industry integrity, maximise returns and ensure a sustainable future.

One of the critical issues affecting GA and its ability to achieve its organisational aims is that of animal welfare. GA recognises that animal welfare is a complex issue, with science and ethics at its core. However, GA also understands that if community expectations on welfare standards are not met, then support for the industry will be significantly eroded.

GA and other industry stakeholders make moral and ethical judgments on greyhound welfare based on sound research. At the same time, it is recognised that decisions about welfare are influenced by cultural, social, economic and occupational health and safety considerations. In addition, GA emphasises the importance of the necessary skills and responsibilities of animal carers and their role in good husbandry and the delivery of acceptable animal welfare outcomes.

GA will continue to play a strong role in promoting high welfare standards and will continue to assist its members in ensuring that all animal carers have access to the necessary animal welfare information and appropriate training. GA's state and territory member organisations are responsible for ensuring that agreed welfare standards are met by owners, breeders and other industry participants.

PRINCIPLES

GA acknowledges that the greyhound racing industry, its promoters and regulators are collectively accountable for the welfare of all animals involved in greyhound racing in Australia. GA believes that this accountability covers the whole life cycle of the greyhound.

GA has identified the basic needs of greyhounds as:

- Readily accessible food and water in sufficient quantities to maintain health and vigor
- Freedom of movement to stand, stretch and lie down
- Regular exercise
- Shelter and accommodation that provides protection from the elements
- Protection from disease, and regular inspections to assess the need for attention to feet, teeth, and internal and external parasite control
- Rapid identification and treatment of injury and disease.

In identifying these basic needs, GA has relied upon research and the vast wealth of experience held amongst Australian breeders, trainers and animal carers.

GA and its member organisations are also aware of certain cases of neglect and animal mistreatment. GA understands that as an industry there are individuals who do not follow GA's best practice standards, and others who do not hold the welfare of the animal as a central concern.

GA condemns:

- Any form of cruelty and neglect of greyhounds and other animals – appropriate action must be taken where such cruelty or neglect is identified, including consulting with the RSPCA or other relevant authorities that are in a position to take action against an offender.
- The use of any live animal in the training or racing of greyhounds.

- The use of greyhounds for unauthorised or unjustifiable medical or other experiments.
- *The export of greyhounds to countries without a properly managed greyhound racing industry, or where such an industry is not sufficiently regulated to ensure the welfare of greyhounds.*

GA Standards

The following standards are in place to ensure the responsible care and humane treatment of all racing greyhounds. GA expects all industry participants to abide by these standards and will work with the RSPCA and relevant authorities to ensure action is taken against offenders. GA expects that:

- All greyhounds shall be housed in comfortable, clean, safe and well ventilated kennels
- All greyhounds shall receive healthy food and plenty of water
- All greyhounds shall be provided appropriate exercise in clean and safe areas
- All greyhounds shall receive prompt veterinary care
- All greyhounds shall be trained and cared for by qualified, competent and responsible personnel according to established animal welfare guidelines.

GA is also concerned with the complex issues associated with retired greyhounds and as such, will actively promote the Greyhound Adoption Programs in all states and territories.

GA understands that much of the responsibility for animal welfare issues rests with greyhound racing clubs and as such, supports and promotes policies and regulatory proposals that require greyhound racing clubs and associated organisations to:

- Provide and maintain a safe racing environment to minimise the risk of injury to greyhounds before, during or after their race, including at trial tracks
- Make clubs accountable for greyhound welfare issues associated with the club's facilities and activities
- Provide first aid resources and facilities at all trial and race meetings
- Ensure prompt access to veterinary services for injured dogs at all races and trials.

GA also understands that shared responsibility for welfare issues across the industry leads to the need for direct accountability for their maintenance. To help enforce appropriate accountability for animal welfare amongst all key stakeholders, GA supports the development of:

- Lifetime 'tracking' of all registered greyhounds to ensure industry accountability for the welfare of all greyhounds bred in Australia
- Policies and initiatives to extend the racing life of greyhounds where this does not adversely affect the welfare of the dog
- Responsible breeding policies that support the principles of animal welfare.

GA recommends that state and territory authorities work in consultation with the industry to develop best practice guidelines for standards of care that address greyhound and animal welfare issues covering all stages and aspects of a dog's life cycle and racing-related activities. Such best practice guidelines and standards could be advanced through a combination of animal and greyhound welfare policies and regulations, as well as the introduction of information, education and enforcement programs.

Best Practice Guidelines for Standards of Care

GA recommends that state and territory authorities work in consultation with the industry to develop best practice guidelines for standards of care that address greyhound and animal welfare issues covering all stages and aspects of a greyhound's life cycle and activities. Such best practice guidelines and standards on the one hand could be advanced by a combination of animal and greyhound welfare policies and regulations, and information, education and enforcement programs on the other. The following is provided as a starting point:

STANDARDS OF CARE AND MANAGEMENT FOR EACH STAGE IN THE LIFE CYCLE OF A GREYHOUND

- From conception, whelping and rearing of pups to 12 weeks
- Pups from 12 weeks to pre-training
- Pre-training (from 14 months)
- Race training (18 months to retirement)
- Racing
- Sale and export of greyhounds
- Retirement
- General management of greyhounds
 - Care of greyhounds
 - Record keeping
 - Staff involved in the care of greyhounds
 - Food and water
 - Feeding
 - Containers
 - Pups and young greyhounds
- Kennels
 - Construction of kennels
 - Kennel size
- Hygiene
 - Cleaning and disinfection
 - Pest control
 - Waste disposal
- Transport
 - Methods of transport
 - Provision of water for duration of transport
 - Breaks during the trip
 - Mode of transport sanitary conditions
- Race training care
- Health, veterinary care, disease and ill health
 - Health checks
 - Veterinary care
 - Disease and ill health
 - Euthanasia
 - Environment
 - Security standards
 - Exercise

- Rules of greyhound racing
 - Offences
 - Proper care (welfare) of greyhounds

Attachment B: Greyhound Australasia Application for Greyhound Passport



APPLICATION FOR GREYHOUND PASSPORT

By Exporter

I/We
(NAME/S IN BLOCK LETTERS)

of
(BLOCK LETTERS)

.....
STATE POSTCODE PHONE

I/We hereby apply to Greyhounds Australasia for a Greyhound Passport and Export Pedigree for the following greyhound:

NAME OF GREYHOUND:

EARBRANDS:

BREEDING: X
(Sire) (Dam)

WHELPED:

CERTIFICATE NO:
(Certificate to be enclosed with application)

The following question must be answered to meet compliance regulations

COUNTRY OF DESTINATION:

REASON FOR EXPORT:

<input type="checkbox"/>	Racing
<input type="checkbox"/>	Breeding
<input type="checkbox"/>	Pet

(Tick Relevant box)

SIGNATURE/S:

DATE:

IS THERE A TRANSFER OF OWNERSHIP? YES NO

If there is a change of ownership the signed transfer of ownership form must be enclosed.

NEW OWNER / TRAINER DETAILS:

NAME:

ADDRESS:

IMPORTANT INFORMATION – PLEASE READ:

The original greyhound registration certificate and/or puppy papers (if unnamed) must be lodged with the application.

Under Greyhounds Australasia (GA) rules any person exporting a greyhound(s) to another country must prior to meeting the requirements of the Australian Quarantine and Inspection Service (AQIS) obtain a Greyhound Passport.

Specifically Greyhounds Australasia Rule 124 (1) states that,
“Any person intending to export a greyhound, being a greyhound the subject of these Rules or to those of a relevant Registration Controlling Body, from Australia or New Zealand to any other country (excluding Australia or New Zealand) must, prior to meeting the quarantine and inspection service requirements of the relevant country, obtain a greyhound passport and certified pedigree issued by Greyhounds Australasia.”

FEE: \$210.00 for all countries (excluding NZ)

Please lodge your application, certificate of greyhound and fee direct to:

**Greyhounds Australasia
P.O. Box 239 Springvale Vic 3171**

Phone: (03) 9548 3500

Fax: (03) 9548 3488

Email: admin@galtd.org.au

Attachment C: Responsible Breeding Taskforce Review Recommendations

Nationally Endorsed Responsible Breeding Objectives

REGISTRATION

Recommendation 1

Effective 1 July 2008, all breeders (including stud masters) and commercial (to be defined) rearers be registered for a nominal fee (\$25p.a.) with the provision of 'The Adviser'.

EDUCATION: DECISION TO BREED – MAKING THE RESPONSIBLE CHOICE

Recommendation 2

Provide participants with information in relation to success rates for categories of both sires and brood bitches, including analytical data in relation to breeding with a bitch that was unsuccessful on the racetrack or unsuccessful in her first two litters.

Recommendation 3

Provide educational material about making the right decision to breed a litter.

Recommendation 4

Ensure participants are kept up to date with society's changing values in relation to animal welfare and the impact this will have on the future direction of the industry.

EDUCATION – WHELPING AND REARING

Recommendation 5

Introduce biannual seminars for participants at leading rearing establishments, as well as produce an educational video in relation to whelping and rearing for participants with footage of rearing properties.

Recommendation 6

Develop a Competency Package for whelping and rearing.

EDUCATION – COSTS

Recommendation 7

Provide participants and potential owners with material in relation to the total costs involved in owning a greyhound and breeding a litter of pups.

Recommendation 8

Provide participants with educational material which explains that owning more greyhounds doesn't always mean a greater chance of success if breeders/owners are 'cutting corners' to cater for more greyhounds.

TRACKING OF GREYHOUNDS

Recommendation 9

Implementation of a system whereby every greyhound is tracked for its entire life by the relevant controlling authority through a system which records details of an owner against the ear brand of a greyhound. It would be mandatory that when a greyhound's ownership changes, an Ownership Return must be lodged within 48 hours to the authority.

OTHER – INDUSTRY FEEDBACK

Recommendation 10

Stewards Departments to take a firmer approach to kennel inspections – spot checks and more general inspections.

Attachment D: Required Standards for Countries Seeking to Import Australian Greyhounds

HOST COUNTRY EXPORT WELFARE STANDARDS

To recognise differences in culture and legislation, and to ensure that the Australian standards are enforced, it is expected that any countries seeking to import Australian greyhounds will also undertake the following compliance activities:

- Keep accurate records to ensure that the owner of a greyhound (and hence, the person directly responsible for the animal's welfare) is known at all times
- Undertake permanent identification of greyhounds
- Maintain minimum husbandry requirements, including nutrition, health and veterinary care, housing, hygiene, exercise, transport and security
- Participate in licensing and education activities
- Monitor and report on breeding and rearing practices for participants
- Clearly document and make accessible:
 - Training and education material for local participants in support of the international standards to ensure the ongoing welfare of the greyhound
 - Policies for post-racing welfare requirements, including an outline on retirement, re-homing opportunities and acceptable method(s) of euthanasia
 - Race day procedures, including the requirement for a registered veterinarian to be accessible for all race meetings – overall assessment of track safety is also paramount
 - Formal rules of racing, including drug testing protocols.

In addition to these standards, Australia also supports the development of:

- Lifetime 'tracking' of all greyhounds to ensure industry accountability for the welfare of all dogs
- Policies and initiatives to extend the racing life of greyhounds where this does not adversely affect the welfare of the greyhound
- Greyhound adoption or re-homing programs
- Breeding policies that support the principles of animal welfare.

Australia also supports policies and regulatory procedures that require greyhound racing providers and associated organisations to:

- Provide and maintain a safe racing environment to minimise the risk of injury to greyhounds before, during and after their race/trial
- Make providers accountable for greyhound welfare issues associated with the club's facilities and activities
- Provide first aid resources and facilities at all race/trial meetings
- Ensure prompt access to veterinary services for injured dogs at all races/trials.

General Care and Management of Greyhounds in Training

1. HOUSING

All greyhounds shall be housed in comfortable, clean, safe, well ventilated and well insulated kennels.

Location of kennels

- Greyhound kennels should be located away from sources of excessive noise or pollution that could stress or injure the dogs, and if external, be positioned in a shaded area to minimise excessive heat where possible.

Construction and general requirements of kennels

- Designated kennels must be designed and constructed, serviced and maintained in a way that provides for the good health and wellbeing of greyhounds, prevents the transmission of infectious diseases, escape of dogs, and does not cause risk of injury to greyhounds or humans.
- Kennels (sleeping areas and run) must provide adequate protection from rain and wind and protection from extremes of temperature. Adequate shade and ventilation must be provided to maintain the health of greyhounds while minimising undue draughts, odours and moisture condensation. Kennels must be constructed to ensure that there is no risk of physical harm to the greyhound or trainer.
- Greyhound enclosures should prevent interference of the dogs by unauthorised people.
- Greyhound enclosures must be designed for ease of cleaning, feeding, watering and regular inspection.
- All solid surfaces of greyhound enclosures must be impervious or painted to facilitate cleaning and disinfection – only non-toxic paint should be used in greyhound enclosures.
- Outdoor kennels must be partially enclosed to provide sheltered sleeping areas.
- Where kennels are indoors, the environment should be controlled to ensure the comfort of the greyhound, inclusive of indoors temperature, humidity and appropriate ventilation.
- Lighting should be as close as possible in duration and intensity to natural conditions.
- All greyhounds should be provided with raised wooden sleeping boards, dog houses or trampoline-style beds.
- Kennels should be easily cleaned and well drained.
- All sleeping areas for greyhounds must have clean, hygienic, dry bedding sufficient to insulate them from the floor.
- Adequate fencing must exist to prevent escape of greyhounds and provide a secure environment for their accommodation and training, whilst minimising the impact on surrounding properties.
- The location of kennels should be away from sources of noise or pollution that could cause injury or stress to the greyhound.
- Kennels should be connected to a sewer or on a septic system in accordance with the requirement of the local government or relevant authority, or have some other adequate and acceptable method for the disposal of faeces and liquid waste.

Kennel size

- Kennel areas should provide at least enough space for each animal to feed, sleep, sit, stand and lie with limbs extended, stretch and move about.
- Kennels for adult dogs, including sleeping quarters and runs, should meet the following requirements:

Racing kennel – minimum size = 3 sqm (e.g. 2m x 1.5m)

- A kennel enclosure for housing a single greyhound in race training generally situated within a secure building and designed to encourage the greyhound to rest.

- Fencing should be appropriately constructed with well maintained fencing mesh standing 1.8m high on a concrete or fixed base.
- Posts may be steel and/or wood and fencing should be strained as appropriate to ensure the security of the greyhound.

Day/spelling yard – minimum size not less than 6 sqm

- Wire mesh enclosed space often with an associated kennel where a single greyhound may spend short periods of time recuperating outdoors.
- Fencing should be a minimum of 1.7m high and a further 0.1m should be buried into the ground to prevent digging and escape.
- Provision for shade – either a natural or permanent structure must be provided.

Exercise yard

- A series of two or more fenced enclosures used to exercise greyhounds adjacent to each other – each yard is generally 30 to 50m in length and 3 to 4 m wide, but may vary in shape dependent on site characteristics.
- Fencing should be a minimum of 1.2m high – consideration should be given to the provision of shading if greyhounds are to be exposed for an extended period of time.

2. HEALTH AND VETERINARY CARE

All greyhounds shall receive healthy food and a continuous supply of fresh of water.

Health checks

- All greyhounds should be inspected at least once daily to monitor their health and wellbeing.
- Any changes in health status must be promptly reported to the person responsible for appropriate action.
- Health checks and treatment should be recorded, with treatment and medication records maintained for each greyhound.

Veterinary care

- The responsible owner/trainer must liaise with a veterinary surgeon that is able to attend to greyhounds in his or her care and advise on disease prevention measures.
- The responsible owner/trainer/staff should be familiar with the signs of common disease and injury in their greyhound.
- When signs of disease or injury are observed, action must be promptly taken to protect the wellbeing of individual greyhounds and prevent the spread of disease.
- Appropriate veterinary care must be provided for sick greyhounds.
- Greyhounds suspected of being injured or diseased should not be allowed to race, be overworked or offered for sale.
- Sick or injured greyhounds should be kept isolated from healthy greyhounds.
- Veterinary advice should be obtained in the event of unexplained illness or deaths.
- Internal and external parasites should be controlled in accordance with veterinary advice.

Euthanasia

- As the result of injury, sickness or age, or where treatment to restore the health/physical wellbeing of a dog is impractical or unsuccessful, greyhounds must have the benefit of humane euthanasia
- Euthanasia should only be performed by a veterinarian.

3. GENERAL WELFARE

Exercise

- Dogs must have the opportunity to exercise once or twice a day to:
- Allow them to be checked over;
- Allow them to stretch their limbs; and
- Give them contact with humans.
- Exercise can be provided by walking dogs on a lead for a minimum of 30 minutes once daily, or 15 minutes twice daily. Very active, very old or injured dogs may require more or less exercise than indicated above.
- Swimming may also provide an optional exercise regime.
- If the dog is not being raced, it should be given an opportunity to be exercised in a suitable training area.
- A walking machine can be used to assist in exercising greyhounds, but should not be seen as a replacement for external walking and environmental stimulation.

Hygiene

Cleaning and disinfection

- Greyhound enclosures, their surrounds and enclosed equipment must be kept clean to assist with disease prevention and ensure the wellbeing of greyhounds.
- Greyhound enclosures should be managed to minimise the risk of cross-infection.
- All internal greyhound enclosures should be treated with appropriate disinfectants once a week or more frequently as necessary.
- Cleaning and disinfectant chemicals and materials should be chosen on the basis of their suitability, safety and effectiveness and must only be used in accordance with manufacturers' instructions.

Pest control

- Pests, including fleas, flies, lice, mosquitoes and wild rodents, must be controlled.
- Specialist advice should be sought before pest control operations are conducted in order to protect the health and safety of the staff and greyhounds.
- Chemicals used for pest control should be registered under the *Pesticides Act* and only used in accordance with manufacturers' instructions.

Waste disposal

- Droppings, bedding and food wastes must be disposed of promptly and hygienically in accordance with the requirements of the local government authority.

Transport

- Transport should only be in containers, trailers or motor vehicles designed for the purpose of transporting animals of greyhound size, including:
- Enclosed trailer – insulated and ventilated
- In car with owner or handler
- In rear compartment of a station wagon, SUV or appropriately fitted van.
- Modes of transport that are not suitable include:
- Wire cages in trailers or utilities etc. which are open to the elements
- Non-ventilated or non-insulated trailers.
- All greyhounds transported in motor vehicles should be suitably restrained to ensure security and protection for the driver and passengers of the vehicle, as well as the greyhound, in order to avoid injury or discomfort.
- Vehicle transport must ensure that the greyhound has enough room to adequately stretch in a standing position, as well lie down comfortably, in order to avoid trauma during transport.
- Greyhounds must be protected from extremes of temperature during transport and provided with adequate light and ventilation.
- Greyhounds should be provided with food and water and must be given regular opportunity to relieve themselves outside the vehicle during long periods of transportation.
- Good quality water should be provided to greyhounds at least every six hours or more frequently on hot or humid days.
- Transport by air should be conducted in accordance with International Air Transport Association (IATA) standards.
- A greyhound should not be kept in a mode of transport for more than six hours without breaks provided – a break should consist of being let out of the mode of transport for at least ten minutes.

Food and water

- Greyhounds must receive appropriate and sufficient food and water at all times to maintain good health and growth and which recognise the special needs of differing ages.
- Food must be stored in a manner that best prevents its deterioration.

Feeding

- Healthy mature greyhounds in race training must be fed at least once each day to gain adequate nutrition for their race training needs.
- Puppies should be fed at least twice each day, or more frequently, as required.
- All healthy greyhounds should be fed at least once each day, or more frequently if pregnant or nursing puppies.
- Sick greyhounds should be fed in accordance with veterinary advice.
- Food should be presented in appropriate containers (i.e. non-chewable and non-spillable) and cleaned at least once a day.

Containers

- Food and water containers must be stable, non-toxic and easily cleaned. Containers should be readily accessible to greyhounds and be positioned in such a way to avoid spillage or contamination by urine or faeces.
- Spoiled food must be removed.
- Fresh water must be available at all times from ceramic, glass, plastic, aluminium, stainless steel or galvanised iron containers, as appropriate.

4. CLUBS/TRACKS/RACING (VENUE OPERATORS)

- Venue operators/clubs/tracks provide and maintain a safe racing environment to minimise the risk of injury to greyhounds before, during and after their race/trial.

- Venue operators/clubs/tracks provide first aid resources and facilities at all trial/race meetings.
- Venue operators/clubs/tracks ensure prompt access to veterinary services for injured dogs at all races/trials.
- Venue operators/clubs/tracks not use any live animal in the training or racing of greyhounds.

Race rules and operating standards should be reviewed by venue operators/clubs/tracks to minimise the risk of greyhound injury or distress and ensure prompt attention to injured dogs, including:

- Standards for race/trial track kennels, including ventilation and sound proofing
- Rules and policies for pre-race kenneling consistent with greyhound welfare
- Hot weather policy, including triggers for abandoning race meetings
- Standards for canine first aid skills and facilities at all trial/race tracks, including canine first aid kits, stretchers and canine first aid room
- Venue operators/clubs/tracks to ensure appropriate access to veterinary services at all races.

Race training care

- Exercise designed to prepare the greyhound for racing should be regular and incremental and not excessive.
- A competent person should carefully examine greyhounds after fast exercise for any signs of injury or physical stress.
- Race trialing should only be carried out at tracks licensed for the purpose.
- Greyhounds found to be injured must not be exercised or galloped in a manner that may aggravate such injury.
- Injury sustained through exercise shall be treated in accordance with accepted veterinary practice, which may include resting or spelling in order to facilitate recovery.
- Prohibited substances as defined by the rules shall not be administered to a greyhound for any purpose unless by, or under the instruction of, a vet and only in accordance with regulations relevant to racing.

5. LIFE CYCLE – ACCOUNTABILITY/RESPONSIBILITY

- Australia supports the development of lifetime tracking of all registered greyhounds to ensure industry accountability for the welfare of all greyhounds bred in Australia.
- Australia supports the development of policies and initiatives to extend the racing life of greyhounds where this does not adversely affect the welfare of the dog.
- Australia supports the development of appropriate breeding policies that support the principles of animal welfare.
- DAFF Biosecurity regulates the export of greyhounds and certifies whether the animals are fit for export and verifies that all of the importing country's health requirements have been met.
- Once the animals reach their destination, welfare concerns are difficult for Australia to pursue because the animals are outside Australia's legal jurisdiction. Australia supports the efforts of governments in other countries to improve animal welfare in many ways, including through the provision of information on animal welfare standards and systems used in Australia.
- Australia is a member of the World Organisation for Animal Health, as well as the Regional Commission for Asia, the Far East and Oceania (OIE). Through this Commission and Australian agriculture counselors in Asian countries, the Australian Government continues to raise awareness of animal welfare issues and provide information and technical cooperation to help improve animal health and welfare within the region.

Standards of care and management are to be exercised during each stage in the life cycle of a greyhound:

- a) From conception, whelping and rearing of pups to 12 weeks
- b) Pups from 12 weeks to pre-training
- c) Pre-training (from 14 months)

- d) Race training (18 months to retirement)
- e) Racing
- f) Sale of greyhounds
- g) Retirement:
 - Policies to be reviewed to investigate means of extending the racing life of a greyhound
 - Increase in the proportion of 'retired' greyhounds adopted through the GAP program
 - Minimise need for euthanasia of 'retired' racing greyhounds wherever possible.

Record keeping

Appropriate records, in accordance with regulatory requirements, must be kept for:

- a) The acquisition and disposal of greyhounds
- b) Illness and death of greyhounds
- c) Veterinary treatment
- d) Trading in greyhounds subject to regulatory control.

Retirement

- Race programming should provide a means for extending the racing life of a greyhound.
- Standards to be developed for the appropriate management and care to ensure the welfare of non-racing greyhounds.
- Increase in the proportion of retired greyhounds adopted through a GAP program.
- Minimise need for euthanasia of retired racing greyhounds wherever possible.
- Encourage the responsible breeding of greyhounds.
- What occurs when greyhounds are deemed unsuitable for racing or have finished racing, including an outline on retirement, re-homing opportunities and acceptable method(s) of euthanasia.

Rules of greyhound racing

Appropriate regulatory rules and policies must be in place to support the ongoing welfare of all greyhounds.

**Attachment E: Host Country Greyhound Export
Self-Assessment Questionnaire**

HOST COUNTRY GREYHOUND EXPORT SELF-ASSESSMENT QUESTIONNAIRE

1. HOUSING

Location of kennels

- 1.1 General location of kennels (i.e. on track or off-site)
- 1.2 Please advise how many kennels/trainers are located on track or off-site

Construction and general requirements of kennels

- 1.3 What materials are your kennels designed and constructed with?
- 1.4 How often are your kennels inspected, serviced and maintained?
- 1.5 What environmental protection is offered within your kennels?
- 1.6 What security measures are in place to prevent interference to greyhounds by unauthorised people?
- 1.7 Please provide general comments on the following components within your kennels:

Lighting:

Shade:

Heating/cooling:

Bedding:

Noise/pollution:

Kennel size

- 1.8 Please advise of your kennel sizes for the following:

- 1.8.1 Kennel at the track (i.e. prior to racing):

- 1.8.2 Kennel for a racing greyhound:

- 1.8.3 Kennel for a greyhound spelling/resting:

- 1.8.4 Area where a greyhound may be exercised freely:

2. HEALTH AND VETERINARY CARE

Health checks

- 2.1 Please advise how often greyhounds are inspected at your kennels/track to monitor health and wellbeing

Veterinary care

2.2 What arrangements/access is in place for veterinary care for the responsible owner/trainer when they have concerns over the health of their greyhounds?

2.3 How familiar are the responsible owners/trainers in diagnosing the signs of common diseases and injury in their greyhounds? What training/education have they received?

Euthanasia

2.4 As the result of injury, sickness or age, or where treatment to restore the health or physical wellbeing of a greyhound is impractical or unsuccessful, what process is involved to undertake humane euthanasia?

2.5 Who performs euthanasia in this instance?

2.6 What record keeping is available regarding your euthanasia processes?

3. GENERAL WELFARE

Identification

3.1 What permanent identification methods do your greyhounds have?

Exercise

3.2 Please comment on the amount of daily exercise greyhounds in your care receive.

3.3 Please advise what forms of exercise they receive (i.e. free galloping, on leads, walking machine, swimming etc.).

Hygiene, cleaning and disinfection

3.4 How often are internal greyhound enclosures treated with disinfectants and what type of products do you use?

Pest control

3.5 How do you monitor and control pests, including fleas, flies, lice, mosquitoes and rodents?

Waste disposal

3.6 How often do you remove droppings, food wastes etc. from kennels and yards, and how is it disposed of?

Transport

3.7 What forms of transport do you use to move the greyhounds (i.e. containers, trailers or motor vehicles)?

3.8 What comforts are provided with this transport?

Enclosed trailer – insulated and ventilated

In car

3.9 Does your transport offer the greyhound enough room to stretch in a standing position as well as lie down comfortably to avoid injury/discomfort?

Food and water

3.10 Please advise what access your greyhounds have to fresh water.

Feeding

3.11 Can you confirm how often and what products your greyhounds in race training are fed to ensure adequate nutrition?

4. CLUBS/TRACKS/RACING

4.1 What maintenance procedures are in place to ensure your tracks provide and maintain a safe racing environment to minimise the risk of injury to greyhounds?

4.2 What first aid resources and facilities are provided by your track at all trials/race meetings?

4.3 What access to veterinary services for injured dogs is offered at all races/trials?

4.4 Do you allow the use of any live animal in the training or racing of greyhounds?

4.5 Can you advise of any specific rules and/or policies relating to racing that assist with managing the health and welfare of your greyhounds?

4.6 What rules do you have in place to restrict the use of prohibited substances?

4.7 On average, how often do your greyhounds race per week and over what distances?

4.8 What licensing and education procedures exist for your owner/trainers/breeders etc?

5. ACCOUNTABILITY/RESPONSIBILITY

5.1 Does your jurisdiction support lifetime tracking of all registered greyhounds? If so, how is it currently managed?

5.2 What policies and initiatives do you have in place to extend the racing life of greyhounds where this does not adversely affect the welfare of the dogs?

5.3 Do you have a greyhound adoption program? If so, please provide information regarding your program.

5.4 What record keeping, in accordance with your regulatory requirements, must be kept?

- (a) The acquisition and disposal of greyhounds
- (b) Illness and death of greyhounds
- (c) Veterinary treatment
- (d) Injury management

5.5 Does your race programming provide a means for extending the racing life of a greyhound? If so, please explain.

5.6 What occurs when greyhounds are deemed unsuitable for racing or have finished racing, including retirement, re-homing opportunities, and method(s) of euthanasia?

5.7 Do you encourage the responsible breeding of greyhounds?

5.8 What regulatory rules and policies do you have in place to support the ongoing welfare of all greyhounds?

Attachment F: Export Self-Assessment Questionnaire Results Summary

**ANALYSIS OF STANDARDS FOR THE EXPORT OF AUSTRALIAN GREYHOUNDS
TO REGULATED HOST COUNTRIES**

EXPORT STANDARD	UNITED KINGDOM	IRELAND	UNITED STATES	CZECH REPUBLIC	VIETNAM	MACAU	NEW ZEALAND
Housing							
o Location of kennels	YES	YES	YES	YES	N/A	YES	YES
o Construction and general requirements of kennels	YES	YES	YES	YES	N/A	YES	YES
o Kennel size	YES	NO	NO	YES	N/A	NO	NO
Health and Veterinary Care							
o Health checks	YES	YES	YES	YES	N/A	YES	YES
o Veterinary care	YES	YES	YES	YES	N/A	YES	YES
o Euthanasia	YES	YES	YES	YES	N/A	NO	YES
General Welfare							
o Identification	YES	YES	YES	YES	N/A	YES	YES
o Exercise	YES	NO	NO	YES	N/A	YES	YES
o Hygiene, cleaning and disinfection	YES	YES	YES	YES	N/A	YES	YES
o Pest control	YES	YES	YES	YES	N/A	YES	YES
o Waste disposal	YES	YES	YES	YES	N/A	YES	YES
o Transport	YES	YES	NO	YES	N/A	YES	YES
o Food and water	YES	YES	YES	YES	N/A	YES	YES
o Feeding	YES	YES	YES	YES	N/A	YES	YES

Clubs/Tracks/Racing							
○ Track maintenance	YES	YES	YES	YES	N/A	NO	YES
○ First aid resources and facilities	YES	YES	YES	YES	N/A	YES	YES
○ Injury management / treatment	YES	YES	YES	YES	N/A	NO	YES
○ Live animal baiting for training	YES	YES	YES	YES	N/A	YES	YES
○ Race rules, policies and operating standards	YES	YES	YES	YES	N/A	YES	YES
○ Race training care	YES	YES	YES	YES	N/A	YES	YES
○ Licensing and education	YES	YES	YES	YES	N/A	YES	YES
Accountability/Responsibility							
○ Life cycle tracking	YES	YES	YES	YES	N/A	YES	YES
○ Extension of racing opportunities	YES	YES	YES	YES	N/A	NO	NO
○ Greyhound adoption programs	YES	YES	YES	YES	N/A	NO	YES
○ Record keeping	YES	YES	YES	YES	N/A	YES	YES
○ Greyhound retirement	YES	YES	YES	YES	N/A	YES	YES
○ Responsible breeding initiatives	YES	YES	YES	YES	N/A	N/A	YES
COMPLIANCE RATING	FULLY COMPLIANT	CLOSE TO FULLY COMPLIANT	CLOSE TO FULLY COMPLIANT	FULLY COMPLIANT	NON COMPLIANT	NOT FULLY COMPLIANT	CLOSE TO FULLY COMPLIANT

Companion Animals

Under Australia's *Export Control Act 1982*, an Export Permit and a Health Certificate are required for export of all live animals from Australia. Live animals for this purpose are defined under section 3.02 of the Export Control (Animals) Order 2004. Many countries require that animals receive treatment/testing/vaccination in Australia before they are eligible for import, and all countries require that live animals receive a final veterinary inspection before export.

The steps below outline the process involved in preparing your animal(s) for export:

1. Pre-export preparation
2. Complying with the importing country's requirements
3. Forward to AQIS a 'Notice of Intention to Export form'
4. Make an appointment with AQIS to collect official documentation
5. Organise transport of the animal
6. AQIS Animal Quarantine Offices.

1. Pre-export preparation

AQIS accredited veterinarians (AAV) who are familiar with the export process:

Contact an AAV to discuss the export process, the importing country's requirements and arrange for the relevant treatments, inspections and documentation to be completed. This initial contact must be made well in advance of the intended date of export as some countries require that animals receive a rabies vaccination at least 30 days before the date of departure. Import Permits may be required for entry of animals into some countries.

If there is any likelihood that your pet will be returning to Australia, it is imperative that you discuss this with AQIS as early as possible. Animals cannot be imported (or returned) directly to Australia from some countries, so appropriate advice is essential before your animal leaves Australia. If you wish to re-import your pet within six months of export, preparations must be made prior to leaving Australia.

- Pre-export preparations for dogs and cats potentially returning to Australia

2. Complying with the importing country's requirements

The exporter is responsible for ensuring that the animal(s) will comply with the importing country's requirements at the time of export.

To obtain information on the preparation and health requirements for the species of animal being exported it may be necessary to:

- Visit the official website of the relevant government authority for the destination country
- Directly contact the relevant government authority by phone, post or email to obtain the latest import requirements in writing. The country's embassy may also be able to assist.

If the importing country requires an import permit this may also detail the specific preparation and health requirements that need to be met.

Only official documentation published or issued by the relevant government authority in the importing country is acceptable to AQIS as the basis for the preparation and health status of the animal(s) intended for export. Health certificates will not be issued based on information from other sources such as pet

transport companies or websites other than the official website of the responsible government authority in the importing country.

Additional information regarding the Export of pets to Europe: *available on Department of Agriculture website.*

3. Forward to AQIS a 'Notice of Intention to Export'

Complete a 'Notice of Intention to Export Live Animals (Other Than Live-stock) or Animal Reproductive Material' (NOI) form and return, by fax or mail, to the AQIS office in the region from which you will be exporting. If you require an import permit from the importing country please provide a copy with the NOI. If the import permit is not in English you will need to supply a certified translated copy. The *Export Control Act* requires that the NOI and any other supporting documentation is received **at least 10 days before** the scheduled date of departure. Contact should be made with the relevant AQIS regional office well in advance of the intended date of export.

Notice of Intention to Export Live Animals (Other Than Live-stock) or Animal Reproductive Material: *forms available on Department of Agriculture website.*

Upon receipt of the NOI, AQIS will assess the application to determine if all information has been provided and the exporter's plans are sufficient to meet the relevant importing country's pre-export preparation requirements. If all the required information has been provided and the preparation plans are acceptable the exporter will be advised that their NOI has been approved. If the NOI is not approved the exporter will be advised of the reasons why and what additional information and/or conditions are required for them to obtain approval.

Approval of the NOI does not necessarily mean that AQIS will issue the export permit and health certificate. The export permit and health certificate will only be issued once AQIS is satisfied that the animal(s) **have** been prepared in accordance with the importing country's requirements.

4. Make an appointment with AQIS to collect the official documentation

Once the NOI has been approved by AQIS the exporter will be contacted to arrange an appointment for the issuing of the export permit and health certificate. The appointment will be after the final inspection by the AAV and within 72 hours of the scheduled time of departure.

At this appointment, present all documentation that has been completed by the AAV together with any other relevant documents (e.g. Import Permits if required, vaccination certificates). Based on this documentation the AQIS Certifying Veterinary Officer will determine whether the animals have qualified for export. If all the necessary pre-export preparations have been completed as required by the importing country and in compliance with AQIS legislation, AQIS will issue the relevant export documentation.

It is not usually a requirement for animals to be presented at the AQIS office. Please check with your regional AQIS office.

The fee for issue of an Export Permit and Official Health Certificate is a time based fee for service charged per quarter hour or part thereof.

Credit Card Payment Form: **available on Department of Agriculture website.**

Please Note: If you are exporting a greyhound(s) from Australia please complete the following form for each greyhound and bring it with you to your AQIS appointment. For more information regarding this form please refer to the information fact sheet from Greyhounds Australasia.

Greyhound Export Declaration Form: *available on Department of Agriculture website.*
 Greyhounds Australasia Information flyer: *available on Department of Agriculture website.*

5. Organise transport of the animal

AQIS does not organise transport or any post-entry quarantine that may be required by the importing country. Separate arrangements must be made with the airline for carriage of the animals well in advance. The scheduled departure date determines the timing of the preparation activities and final inspection by the AAV as well as the appointment time for the issuing of the official export documentation. Some airlines require lodgment of animals by known agents such as animal transport companies. Please check with the airline.

Animal transport containers must comply with the specifications of the International Air Transport Association, which defines container design, construction and size. The container must be of sufficient size to allow each animal enough space to turn about normally while standing, to stand and sit erect, and to lie in a natural position. Your accredited veterinarian, the airline or a pet transport company (check the Yellow Pages telephone directory for companies) can provide further details. Most pet transport companies also sell crates for the international carriage of animals.

For further assistance please contact the AQIS regional office during office hours in the state from which you intend to depart, or email the Live Animal Exports Program at AQIS Exports.

6. AQIS Animal Quarantine Offices

AQIS offices are open Monday to Friday (excluding Public Holidays).

REGION	ADDRESS	PHONE	FAX	APPOINTMENT TIMES
Sydney—NSW	1 Crewe Place, Rosebery, 2018	02 8334 7432	02 8334 7430	8 am to 12 pm & 1 to 3 pm
Melbourne — South East region (incorporates VIC & TAS)	SE Region Animal Program 1st floor 255 Melrose Drive Tullamarine VIC 3043	03 8308 5070 03 8308 5072 03 8308 5076 03 8308 5077	03 8308 5071	Mon – Fri 8.30 am to 12.30 pm. Other times by prior arrangement
Cairns—Nth Qld	Airport Administration Centre, Cairns International Airport 4870	07 4030 7800	07 4035 9578	By prior arrangement
Brisbane—Qld	42-44 Qantas Drive Eagle Farm QLD 4009	07 3246 8731	07 3246 8798	8.30 am to 12 pm
Adelaide—SA	Adelaide International Airport Sir Donald Bradman Drive Export Park SA 5950	08 8201 6000	08 8305 9820	2 pm
Perth—WA	9 Fricker Road Perth Airport 6105	08 9334 1555	08 9334 1668	10.30 am to 12 pm
Darwin—NT	1 Pederson Road	08 8920 7000	08 8920 7011	8 am to 4.20 pm

	(cnr Henry Wigley Road) Marrara 0812			
Canberra—ACT	18 Marcus Clarke Street CANBERRA CITY 2601	02 6272 4581	02 6272 5423	10 am to 12 pm & 2 pm to 4 pm

Attachment H: Risk Management Associated with Greyhounds Exported from Australia

Potential Risks and Mitigation Strategies

Risks that may materialise in the event that passports are not issued and some countries cease importing greyhounds from Australia:

1. Excess supply of greyhounds to be re-homed
2. More greyhounds being euthanised
3. Harm international relationships
4. Loss of income for GA to support welfare initiatives

Risk mitigation strategies that address the above:

1. Offer cheaper rates to enter greyhounds in GAP – throughout the transition period, potentially give greyhounds that were listed for overseas export priority GAP assessment testing.
2. Encourage utilisation of GAP – offer an initial subsidy if greyhounds are entered into GAP.
3. Highlight and encourage GAP, responsible breeding and human euthanasia practices, communicate with government and look for support of GA's standards.
4. Communicate openly and transparently with export agents throughout GA's investigative processes and highlight deficiencies in standards where host countries cease importing Australian greyhounds.
5. Offer discounted passport fees for compliant countries.
6. Consult with international greyhound regulatory bodies – share GA's experiences and information and offer potential assistance to countries who do not meet the standards imposed. For countries that don't comply, communicate GA's position with their respective government.