Reg No: A0017661V

ABN: 67 306 599 068

**Submissions: Greyhound Owners Trainers Breeders Association of Victoria Inc.**

***Hot Weather and Transportation of Greyhounds Policies***

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# Introduction and GOTBA Vic’s approach to rule and policy changes

* 1. These submissions are made by the committee of the Greyhound Owners, Trainers and Breeders Association of Victoria Inc. (Reg No: A0017661V) (ABN: 67 306 599 068) (**GOTBA Vic**) for and on behalf of GOTBA Vic.
	2. GOTBA Vic represents a large number of Victoria’s registered greyhound racing participants across a range of roles. As an organisation, we are committed to serving the interests of our members and advancing the sport of greyhound racing. This includes recognising that the welfare of the greyhound is at the centre of any robust greyhound racing industry, and participation in it.
	3. Submissions are made in this document in respect of:
		+ the (draft, amended) Transportation of Greyhounds Policy dated 17 September 2018 (**Transport Policy**); and
		+ the (draft, amended) Hot Weather Policy dated 3 June 2018 (**Hot Weather Policy**),

in each case published for consultation by the GRV.

* 1. GOTBA Vic representatives have seen and provided some comment on versions of each of the above through GRV’s Industry Consultation Group. These submissions put our position on the consultation drafts.

## Our general approach to rule and policy changes

* 1. GOTBA Vic is not opposed to new or changing rules or policies. However each must be (1) truly necessary based on evidence or need that is disclosed to participants (2) clear and (3) fair in form and application.
	2. **Unnecessary or unnecessarily onerous rules or policies neither advance regulatory aims nor the general interests of the greyhound racing industry**. It is upon the proponent of rules or rule changes (usually GRV as regulator, but not always) to justify them. Each new rule or new regulation should not simply be assumed to be of benefit to the sport or to the greyhound itself. Each new rule or policy must be tested against how participants actually participate (eg do transport rules cater for coursing meetings too)?
	3. With that in mind, our comments on the Transport Policy and Hot Weather Policy follow.

# Transport Policy

## Interaction with the Code of Practice for the Keeping of Racing Greyhounds (**Code**)

* 1. The Code contains a transport policy. GOTBA Vic recognises that the Code is a baseline document, but it is one with detailed input from various persons (even if participants do not always agree with its terms).
	2. **However**, GRV’s policies should **only** look different from a position in the Code if:
		+ the Code does not deal with a particular issue at all; or
		+ GRV has a substantial reason for imposing an additional or varied obligation,

in each case provided GRV gives an evidenced, justification of necessity for doing so, particularly if the rule imposes administrative burden or cost on participants who have to follow it. To do less than that is not responsible regulation.

* 1. It is insufficient justification for a rule or policy change that the rule looks better to an external interest group.
	2. As an example: if GRV wishes to impose an additional timing restriction on stopping during transport over and above the Code, participants are entitled to expect clear, published justification as to why that is necessary.
		+ What **examples** does GRV have of the need for its version, as opposed to the Code version?
		+ Why does the nature of the departure justify any additional costs of compliance?
		+ Does the proposal actually fit with the various needs of participants (eg re coursing)?

## Transport Policy - comments

* 1. At a high level, there are no industry wide or even localised issues with unsafe transportation of greyhounds. By and large, the transport policy is appropriate, if only a reflection of basic common sense.

### Item 21 – Stopping on hot weather affected journeys

* 1. **Item 21 of the Transport Policy** says:

*On hot weather affected journeys, greyhounds must be inspected every two (2) hours during the journey, and if required provided with the opportunity for exercise, toileting and water/fluid consumption. On all other journeys (i.e. if clause 15 does not apply), greyhounds must be inspected every three (3) hours during the journey, and if required provided with the opportunity for exercise, toileting and water/fluid consumption. Where it is necessary to stop the vehicle to inspect the greyhounds, stops must be preplanned to identify safe locations.*

* 1. The Code (at Section 4.5) requires stopping every 3 hours unless unsafe:

*(During transportation, greyhounds must be inspected at least every three hours unless it is unsafe to stop the vehicle. Inspections must occur more frequently if advised by a veterinary practitioner).*

* 1. The Code position has not been shown to be inappropriate in hot weather by GRV by reference to any evidence. Cars and trailers used on hot weather affected journeys are air-conditioned.
	2. **POSITION: Item 21 should only require inspection every 3 hours.**

### Item 22 – Unattended vehicles

* 1. **Item 22 of the Transport Policy** says:

*Greyhounds must not be left unattended in a stationary vehicle or trailer for any period exceeding 20 minutes, except on a hot weather affected day (as specified in the GRV Hot Weather Policy) where greyhounds must not be left unattended for more than 5 minutes. Unattended is defined as the greyhound not being visually checked to ascertain its physical state.*

* 1. A timeframe for *non-*hot weather days is completely inappropriate. Again it has not been shown to be necessary. General obligations about ensuring welfare of animals are appropriate coverage for this.
	2. Greyhounds may often be unattended in a stationary vehicle for more than 20 minutes - eg in a carpark at a greyhound track while kennelling occurs, while a participant stops for lunch, at a coursing track while a participant is attending to other greyhounds. That a vehicle is stopped does NOT necessarily mean that a greyhound is locked inside with no ventilation or that the greyhound is at some additional risk.
	3. On hot weather days, the position is different, however 5 minutes is **not** a feasible timeframe as an absolute, particularly where a participant might (1) leave air conditioning on (2) open a vehicle (with cages etc locked) (3) park a vehicle in a shaded area.
	4. **POSITION: Item 22 should not set a timeframe for non-hot weather days at all. Any hot weather day timeframe should be increased to at least 20 minutes, provided that the vehicle is ventilated or air conditioned.**

### Item 23 – Overnight housing

* 1. **Item 23 of the Transport Policy** says:

*Vehicles and trailers must not be used as overnight housing for greyhounds except in exceptional circumstances as notified to, and approved by, a GRV Steward, GRV Veterinarian or GRV Authorised Officer.*

* 1. The Code says:

*Greyhounds must not be housed in a transport vehicle or transport cage for more than 48 hours, unless approved by GRV for the purposes of a race-meeting (as defined by the Racing Act 1958 (Vic)). Where a greyhound is being housed in a transport vehicle or transport cage for up to 48 hours, greyhounds must be removed from the cage every three hours during daylight hours to exercise and toilet.*

* 1. The Code position is an eminently sensible one. The Transport Policy position is not.
	2. This particular drafting in the Code was addressed and discussed **in detail** in extensive liaison with and consultation by DEDJTR, including between vets, participants (including GOTBA Vic) **and** animal activist groups. Express regard was had to the needs of the industry and safety of the greyhound. **ALL** stakeholders agreed that the Code version was an appropriate position based on sport and animal needs.
	3. Frankly, we do not know why GRV would see fit to depart from its terms. No reason has been provided.
	4. **POSITION: Item 23 should be deleted or replaced in its entirety with the Code position noted above. The Code position was designed with, among other things, coursing meetings in mind.**

### Other – interaction with Hot Weather Policy – transport to morning trials

* 1. See below regarding transport and morning trial sessions on the morning of days that are designated hot weather affected.

# Hot Weather Policy

## Hot Weather Policy – comment - interaction with Transport Policy

* 1. The Hot Weather Policy must be both practical and welfare-based. Greyhounds may be raced, trialled or exercised from before dawn to well after dusk. The Hot Weather Policy should not be unduly rigid.
	2. It is quite possible that morning trial sessions (including transport to and from them) on hot weather affected days may be, in reality, completely unaffected by hot weather.
	3. In so far as a participant has greyhounds engaged in a morning trial session, and the temperature before the participant returns to her/his greyhound training property is less than 32 degrees, that transportation should not be considered hot-weather affected for the purposes of the transportation policy. Either or both the Transport and Hot Weather Policy should be amended accordingly.