



Greyhound Owners Trainers & Breeders Association of Victoria, Inc.

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The Greyhound Owners Trainers & Breeders Association of Victoria, Inc. (GOTBA Vic) is a Victorian body representing greyhound racing participants. Members work every day in the greyhound racing industry, and have significant knowledge of all aspects of the industry and the care of the greyhound.

GOTBA Vic has been asked to provide initial comments on proposed changes to the Greyhounds Australasia Rules, by April 19, 2021. We are aware these rules changes have been in preparation for 18 months – we are given a small window to review.

This is unsatisfactory and participant groups should have been involved in the re-write itself.

GOTBA Vic's overriding concern in the making or amendment of rules generally is that they are evidence-based, fair, necessary and are considered from a cost-benefit perspective. We dislike those that are merely about making administrator jobs easier at the expense of everyday participants or that have no apparent evidence for their insertion.

Our comments are made from this perspective.

FEEDBACK on GA Rules amendments

We have reviewed:

1. GREYHOUNDS AUSTRALASIA LIMITED - GREYHOUNDS AUSTRALASIA RULES - FEBRUARY 2021 – CONSULTATION DRAFT;
2. GA document 'TABLE 1 - NEW AND/OR SUBSTANTIALLY AMENDED DRAFT RULES' (version 10 February 2021).

Comments are made by exception only.

After consultation stage 1, we understand that Greyhounds Australasia will release the draft amendments more generally for comment. We intend to provide a FURTHER set of comments in that consultation.



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GA RULE NO.	TOPIC OF RULE	PROPOSED CHANGE - summary	GOTBA comment
Aims	Aims of the Greyhounds Australasia Rules	New aims	<p>The concept of ‘social licence’/‘social responsibility’ should not be included on the face of the rules. This introduces an amorphous concept into interpretation – which can go as far as ‘an opponent’s licence’ - that does not benefit consistency or clarity in every day use of the rules.</p> <p>We note that no other racing codes have an equivalent in their rules – for good reason.</p> <p>REMOVE: (e) remove ‘and the conduct of it...Zealand’.</p> <p>If rules are to have aims, then the rule being for benefit of those who must obey them MUST be one such aim.</p> <p>INSERT new (a) – <u>promote efficient, consistent operation of rules across greyhound racing jurisdictions for the benefit of registered persons and their greyhounds.</u></p>
<p>PART 1 NOTE: <u>WE REQUIRE A TRACKED DOCUMENT SHOWING CHANGES TO DEFINITIONS TO COMPLETE OUR COMMENTS ON THIS PART</u></p>			
Definitions			NOTE: We require a tracked document showing changes to definitions.



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	<i>Greyhound</i> definition		<p>This should not include a retired greyhound, whether under the control of a registered person or not.</p> <p>A separate definition should be used where it is needed to refer to a 'retired greyhound'.</p>
PART 2: The Powers and Functions of Controlling Bodies			
<p><u>General</u>: Controlling Body powers must always be constrained by due process and fairness. We have real concerns that several proposed changes are just power grabs that detract from basic rights.</p>			
13(1)(h)	New power to require information from certain 'persons associated with greyhound racing'	Requiring information from non-participants	<p>Delete - This is not a proper rule. Rules apply to registered persons.</p> <p>In Victoria any power to obtain information related to welfare etc from non-registered persons resides in standard animal welfare legislation.</p> <p>That is where it MUST remain.</p>
16(4)(a)	Taking possession of a greyhound.	Detention of greyhounds for any 'reasonable period ...[thought] fit'	<p>Firmly opposed.</p> <p>A Controlling Body must not take a greyhound – which is property of a registered person (often unconnected with the person from whom the greyhound is taken) – other than for a defined period or as permitted by relevant legislation (WHICHEVER is SHORTER).</p>



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			<p>We are not aware of any practical rationale for this proposed change. Please provide if there is one.</p> <p>The rule MUST remain 72 hours.</p> <p>Animal welfare legislation in Victoria, for example, has strict controls on seizure and retention that apply an appropriate balance – GARs do not.</p>
16(5)	New offence – failure to provide access to information, records etc		<p>‘Registered person’ not ‘person’.</p> <p>Insert ‘written’ before ‘request’ – the request for personal or other information should be in writing. That is consistent with equivalent other legislation.</p> <p>Stewards must certify in the request that the access is sought for the purposes of a current investigation under the rules.</p> <p>There needs to be a balance between privacy and hair trigger offences under the rules.</p>

PART 3: The Powers and Functions of Stewards

General: Workable rules require a balance between ease of administration and burden and risk on those who must follow them. These rule changes do not meet these standards and the powers are far too onerous and open to abuse.



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19(1)	Length of meeting	'Meeting' goes from 7.30am on day of Event until midnight that day.	This seems a nonsense – it bears no relation to the word defined, and often does not make sense where subsequently used given the new breadth. So a race meeting goes from 10am to 1pm, and the 'meeting' ends at midnight? Why has this change been made?
PART 4: Animal welfare			
<p><u>General:</u> Animal welfare is not means through which unbalanced prescription should be imposed nationally.</p> <p>Where more burdensome rules have been introduced, we ask, where is the evidence of their necessity? GARs should keep to rules for registered persons, and key animal welfare obligations must remain upon those who own the property (ie greyhounds) – owners.</p> <p>We are particularly concerned about rules imposing obligations on 'the last registered person in control of a greyhound'. Realistically this imposes obligations on persons (usually trainers) who are not able to make relevant decisions, which remain in the remit of the owner of the (greyhound) property.</p> <p>We are also concerned about rules that impose silly notification timeframes – 'immediately'.</p>			
21	Care for and welfare of greyhounds		The rules are rules for <i>registered persons</i> and should apply only to them. Non-registered persons are bound by relevant animal welfare legislation. It is bad drafting and



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21(2)		Additional words - , or from anything which is likely to lead to unnecessary pain or suffering'	Remove additional words. The additional words are not necessary, are vague, and create an uncertain form of offence / rule. What is the justification for them – real world examples, please.
21(3)	Condition of premises	See comments	GRV Local Rule 42.2 is a bad rule that is badly drafted, and is duplicative, where it matters, of what will be GAR 21(1). Here, in Victoria, participants are for example told things such as to cut grass in areas that do not house greyhounds. 'A person shall not cause or permit, on any premises owned or occupied by that person, any condition that is likely to be dangerous to the health or safety of that greyhound or which is otherwise offensive' Inappropriate in form. What does 'a condition... which is otherwise offensive' mean? Do not duplicate bad rules.
22	Notification by 'last registered person in control of greyhound' of, retirement, euthanasia, or other death of a greyhound /	Increased notification requirements	This is a poorly thought through rule change.



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	return to racing after retirement		<p>First, the rule should oblige owners of greyhounds only. In Victoria, only OWNERS are responsible for like notifications – see LR 42.3. This would effect a MASSIVE, inappropriate change.</p> <p>Chapeau – ‘At any time after the notification of service pursuant to rule 71’ – sense?</p> <p>22(1)(c) – ‘immediately’ is never an appropriate timeframe – noting that Controlling Bodies are not often ‘immediately’ contactable, and an offence can arise. This must be at least 48 hours.</p> <p>22(2) – why is this further information power – to require information – required? It is present in Victoria – LR 42.3B – but is unfair – bad rules should not be followed.</p> <p>22(5) – this is opposed. Delete. There should be no such power of suspension pending provision of information, which may or may not exist. Any offence – at all – under the rules should be prosecuted under ordinary rules and procedures. Interim suspension provisions ARE FIRMLY OPPOSED – their use in racing is anachronous..</p> <p>False or misleading – offence should occur only if false or misleading info knowingly provided.</p>
23	Notification - breeding		See above re ‘last registered person in control of a greyhound’



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24	Mandatory sterilisation of greyhounds retired as pets	Mandatory sterilisation of retired greyhounds before leaving custody	<p>GOTBA Vic does support mandatory sterilisation of non-breeding retired greyhounds. It is not however required absolutely under the Code of Practice in Victoria, and to some extent this rule is inconsistent with it.</p> <p>However, this GAR should NOT place this responsibility on anyone other than the OWNER of a greyhound, who will make that decision.</p> <p>Trainers, for example, who would not be authorised to have this carried out, cannot be made responsible under the rules to ensure that this occurs.</p> <p><i>FYI – GOTBA Vic considers that a uniform Australia wide funding system for rehoming (including potentially costs of sterilisation) has merit.</i></p>
25	Vaccination requirements		<p>25(3)(d) - delete.</p> <p>Annual C5 vaccinations have not been shown to be necessary.</p>
30	Barking muzzles	BAN proposed	<p>This is completely inappropriate as a national rule. It must be deleted.</p> <p>Barking muzzles are permitted in Victoria, including under the Code of Practice – in consultation the relevant department was satisfied by</p>



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			<p>submissions of greyhound participants that barking muzzles are not cruel and can be appropriately used.</p> <p>They are a legitimate, albeit less commonly used, animal management tool. Used appropriately, particularly in larger kennels, they can result in a significantly lower stress kennel environment for greyhounds – ie they can be welfare positive.</p> <p>GOTBA Vic can provide further information on uses etc of barking muzzles.</p>
32		'ear brand' becomes 'ear tattoo'	A marketing change, why?
34	Requirements in relation to notification of control and location of a greyhound	Change in notification time to 'immediately'	<p>'Immediately' is NEVER an appropriate timeframe in rules.</p> <p>The change has no effect on integrity of racing – we note that Controlling Bodies are not open for 'immediate' notification at all times.</p> <p>48 hours is sufficient.</p>



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35	Use of unauthorised training venue		<p>Need to insert 'knowingly' before takes. Remove 'opinion of the Stewards' – that is inappropriate (and usually is in these rules).</p> <p>What if, for example, a venue's authorisation lapses unknown to those who use it?</p>
36	Offence of allowing a greyhound to be off its lead in a public place		<p>REMOVE.</p> <p>Why is this necessary? Just because it is a WA local rule, or may apply in other regulations, is nowhere near enough reason for a national rule.</p> <p>Note that there is a reasonable chance that in Victoria the off-leash regulation may be abolished altogether for retired greyhounds.</p> <p>According to the definition of 'greyhound' as used, a registered person who has a retired greyhound would also be caught by this rule.</p>
40	Reportable disease	Listing of diseases and restrictions	<p>Kennel cough should not be treated in the same way as other GAR 40(2) listed diseases, in particular as to GAR 40(3)(c) any obligation to seek veterinary attention. It is an ordinary (though of course highly spreadable) disease that can be treated by those experienced in animal husbandry.</p>



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			<p>The rule should also cater more clearly for <i>part</i> of a premises to be declared infected – for example the Code of Practice allows for quarantining of animals within a property.</p> <p>GAR 40(5) – this cannot extend to bringing food and ordinary care items onto a property that has a reportable disease (ie providing ordinary care to greyhounds). That is not a welfare positive rule and needs to be changed.</p>
41	Standdowns for 'conditions'	Vets at tracks able to issue stand downs for 'conditions' (not just injuries), which cannot be revoked.	<p>The words 'Despite subrule (3), those orders (i.e. in relation to a condition or an illness) are not able to be revoked.' ARE COMPLETELY INAPPROPRIATE.</p> <p>Why / how could anyone think this rule change is ever appropriate?</p> <p>Good faith misdiagnoses by vets at racetracks are regular occurrences (inexperience, lack of diagnostic material etc)..</p> <p>Stand-downs – which could be for any period of time - MUST be able to be revoked on further analysis. Remember, this rule could prevent a perfectly healthy greyhound from racing for significant prizemoney.</p>
PART 5 Registration requirements for persons and greyhounds			



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General: NIL			
PART 6 Breeding and identity			
<u>General:</u> Why does 'female greyhound' replace 'bitch'? Explain.			
64(2)	Registration of litter	Official may refuse registration if they are of the view a greyhound appears unwell	DELETE. Why is an official's view on health or condition of a greyhound a reason not to record registration of it (as opposed to direct it to be checked or treated)?
PART 7 Events and meetings			
<u>General:</u> We note that many definitional changes – eg 'meeting' – have flow on effect here.			
95	Offence of not being in a condition to handle a greyhound	An offence is committed if a person handles, or attempts to handle, a greyhound when	Is this really necessary as a national rule? Where is the evidence of a problem?



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		incapable of doing so by reason of intoxication, illness or any other cause.	NOTE: Query whether illness is fairly included, particularly in the offence provision. Subs (1) and (3) are sufficient.
122(1)	Obligation to report a matter affecting performance or health or welfare	Additional requirement to notify stewards of any other matter related to health of greyhound.	This obligation backs off what Stewards 'noted...during or immediately after an Event'. If the rule is to work – the reasons for it are fair – there needs to be an obligation for Stewards to tell the trainer or person in charge what they have noted. Please insert.
127	Marring/failing to pursue	Change – 1 st offence 28 days same track, 2 nd offence 28 days all tracks, 3 rd offence 3 months and 2 x sat trials	This is a good rule change, save that we are unable to see a rationale in punishing a greyhound - and participant - if a greyhound fails to chase <u>by reason of injury (IRRESPECTIVE of the number of times this occurs)</u> . If a greyhound fails to chase or mars, it should be 'pulled in' by stewards. If it is found injured, whether for the first OR a subsequent time, it should not be penalised for this and there needs to be this explicit inclusion in the rules (whether in GAR 125 or otherwise). This is basic fairness.



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			<p><i>INSERT (whether by amending GAR 125 or in 127): A greyhound is not guilty of marring or failing to pursue for the purpose of this rule if on inspection by an officiating veterinarian the greyhound is found to have an injury that in the opinion of the officiating veterinarian reasonably contributed to the marring or failure to pursue.</i></p>
<p>PART 8 Prohibited substances</p>			
<p><u>General:</u> These are obtuse rules that are inconsistent with the growing body of sports prohibited substance rules that focus on thresholds reflective of actual performance enhancement. It should be recalled that, in form, everything is first prohibited. Many of the rules are ridiculous in breadth – see R139(6)- attempt to suggest that any person who owns a greyhound located at the premises of a person who possesses a permanently banned prohibited substance also possesses it. That is so obscene as to be arbitrary and capricious, and unenforceable.</p> <p>GA should take this opportunity to reassess whether these rules are proper in a modern regulatory environment, which it may have done at least in part with GARs 146 and 147.</p> <p>Greyhound racing is damaged by rules, and prosecutions of them, that persist in punishing obvious contamination presence, that no-one seriously could consider affects performance, as if it did affect performance, by suspensions or DQs. Many changes seem made to make prosecution easier. It causes real damage to the sport and people in it.</p> <p>These rules should contemplate a ‘warning’ system for contaminations (with race DQs), ahead of a subsequent punishment.</p>			
139(3)(c)		[Not new rule]	This should not be a matter of a steward opinion, as opposed to a vet or other professional.



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140	Prohibited Substances subject to a threshold		<p>There should be far more of these.</p> <p>This is NOT about ‘cheating’, but about fair and responsible prohibited substance prevention – to avoid penalising irrelevancies or contaminations that do not affect performance.</p> <p>We refer also to GAR 146 and 147.</p>
142 And 143(1)(b)	Administration of a prohibited substance	<p>New – attempt to administer; ‘aid or abet’ attempt.</p> <p>‘prior knowledge of attempt or administration’</p>	<p>Rejected.</p> <p>We have seen no evidence this is necessary.</p> <p>Concepts of accessory guilt for an offence are well established at law, and should not be further qualified – particularly as to the ‘prior knowledge’ offence, which seems an attempt to ‘criminalise’ at a lower level than ‘aid/abet/concern’.</p> <p>This would be out of step with ordinary offence provisions elsewhere in the law.</p> <p>INFORMATION REQUEST: Where has this come from, other than an attempt to ‘make things easier’ for stewards?</p> <p>Unbalanced law is bad law.</p>



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146 & 147	Therapeutic substances and screening limits Residue substances and residue limits		<p>This appears to be an EXCELLENT development if its intent is to provide a threshold under which ordinary treatments may be seen in samples that are ever more sensitive.</p> <p>INFORMATION REQUEST: Participants should have the rationale – analysis – behind the substances and thresholds released – eg those at R 146(6) and R 147(6) – and available publicly.</p> <p>Can we please have the proposed operation of GAR 146 and 147 explained in further detail.</p>
148	Possession of a prohibited substance	'The provisions in rule 148 as they relate to possession are more detailed than the currently existing provisions in relation to possession.'	The rule should apply to registered persons.
150	Prohibited methods of treatment of greyhounds		The rule should apply to registered persons.
152	Evidentiary provisions	Various changes	What is the need to insert new provisions to 'clarify and assist in the process of proving offences in relation to prohibited substances.'?



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			<p>Where is the evidence of necessity?</p> <p>Might it not be appropriate simply for controlling bodies to prove the things that ought be proven?</p> <p>New R152(3)(c) is perverse and should be deleted - <i>the person or body bringing the charge does not need to prove that a prohibited substance has a particular effect on a greyhound, such as a particular performance or behaviour effect: rule 152(3)(c); and</i></p> <p>Why not? What is the purpose of these rules then?</p> <p>New 152(3)(d) - the person or body bringing a charge does not need to prove that a substance has been scientifically proven to enhance the performance of either a greyhound or other mammal: rule 152(3)(d)</p> <p>Why not? What is the purpose of these rules then?</p>
154	Testing procedures, and the evidentiary value of certificates of analysis	Conclusive evidence	<p>Retain the rule as is.</p> <p>A 'more streamlined way to establish the presence of a prohibited substance' is merely code for 'making our job easier at the expense of an important right of a person affected by the allegation we are making.'</p>



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PART 9: Misconduct/offences			
<p><u>General:</u> The changes proposed are various but have a common theme of removing ordinary proof requirements, or increasing burdens, on the apparent basis of the importance of the subject matter. Animal welfare is obviously important. But so too are the rights of individuals whose livelihoods and reputations may be affected by the application of public powers. There is a balance, and these changes often are unbalanced.</p>			
156(w)	Additional offence – breaching a Code of Practice	Making a Code breach a breach of the rules.	<p>No. Delete the offence altogether.</p> <p>This sort of cross-pollination is completely inappropriate in the GARs, and the rule also has the effect of causing controlling body <i>policies</i> into rules outside the construct of local rules and national rules.</p>
159(2)	Offences relating to luring and baiting	Penalty – future registration	<p>This rule should not attempt to override or fetter the discretion of independent disciplinary bodies as to appropriate penalties by purporting to ‘future proof’ against return of persons found guilty.</p> <p>That is inconsistent with basic rule of law.</p>
159(5)			



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	Offences relating to luring and baiting	Absolute liability offences	Rejected. Usually the more serious an offence, particularly in terms of potential penalty, the LESS likely it is to be an absolute liability offence (or have elements that are absolute liability), which is contrary to what is happening here. The more serious the consequence, the more fairness and rigour should be applied to the proof etc of the offence.
162(a) and (e)	Other animal welfare offences		<p>162(a) – this should not say ‘pleads guilty or is’. A charge can still be found not proven despite a person’s plea.</p> <p>162(d) / (e) - Re-insert ‘undue’ – with respect, some gear - putting on a bandage - etc inflict pain for a short period. “Undue” reflects common sense.</p> <p>162(e) – remove ‘in the opinion of Stewards’. This should not be a matter of opinion, but one of proof in the appropriate tribunal.</p>
164(b)	Offences in relation to investigations and inquiries	Attendance (b)	<p>It should not be an offence to fail to attend an hearing or appeal proceeding. It may not be wise to do so, but that does not mean it should be an offence.</p> <p>See also GAR 170(6).</p>



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168	Obligations of registered persons to report certain offences and circumstances	Obligation to notify CB of offences etc	(a) Should be removed –WHY is it necessary? It is of no concern to Controlling Bodies whether a registered person commits any offence. We understand the ‘fit and proper person’ point, but there is no real reason for irrelevant convictions to be reported.