



Code of Practice for the Keeping of Racing Greyhounds Draft

**Submission from the Australian Veterinary
Association (Victorian Division)**



The AVA

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 9700 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, livestock and wildlife. Government veterinarians work with animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We also have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association. The AVA also has a range of special interest groups (SIGs), allowing members with shared interests or expertise to develop their practice and skills in a specific area. For the purposes of reviewing the *Code of Practice for the Keeping of Racing Greyhounds Draft* (the Draft), two of these special interest groups – the Greyhound SIG and the Animal Welfare and Ethics SIG – have been consulted for their invaluable expertise and knowledge to produce this submission.

The Draft

The AVA is extremely supportive of the Draft, which aims to improve the welfare of racing greyhounds throughout all stages of their life. The AVA commends the Victorian State Government for the clear and well-written content contained within the Draft. We are pleased with the emphasis on health management plans that will see proprietors of greyhound establishments working closely with veterinarians to achieve improved animal welfare outcomes. To enhance compliance with the final *Code of Practice for the Keeping of Racing Greyhounds*, the AVA will be proactively pursuing and offering training opportunities for AVA members in greyhound behaviour assessment and treatment, in addition to developing resources for AVA members to assist them with compliance. The AVA fully endorses the Draft with a few amendments identified in this submission.

Greyhound Racing Victoria

Although we are aware that Greyhound Racing Victoria will be responsible for enforcing compliance of the final *Code of Practice for the Keeping of Racing Greyhounds*, we would like to see a section stating that this includes the provision that greyhound establishments will be inspected by Greyhound Racing Victoria's Animal Welfare Inspectors on an ongoing basis. We recommend these inspections should occur annually.



Section 3.1 Staff ratio

Throughout this section it states an absolute number of staff that must be present onsite to care for greyhounds at an establishment. Feed time and socialisation of pups is far more intensive than other times so we recommend that the words **"at least"** be inserted before each staff requirement number.

Section 3.2 Proprietor

Our view is that all euthanasia should be carried out by a veterinarian. The health management plan states that a vet should be available to attend within 30 minutes so this should alleviate the need for a lay person needing to administer euthanasia. Access to euthanasia drugs by a lay person is illegal.

If, however, emergency euthanasia is required to be available, we recommend an expansion to the paragraph that addresses euthanasia by a proprietor. This paragraph states that *"Euthanasia must only be carried out by a veterinary practitioner, except in emergency situations where the operations manager may carry out humane euthanasia under the direction of a veterinary practitioner."* We suggest that the wording should be **"extreme emergency situations"** and that conditions such as fractured spines, severe head trauma and the inability to move the dog due to extreme pain be listed as those conditions. Without legal access to euthanasia drugs, a gunshot to the head by a trained/accredited handler is the preferred method. We further suggest that if a proprietor performs euthanasia under the direction of a veterinary practitioner, that the cadaver must be presented to a veterinary practitioner and an autopsy performed and documented.

Section 3.3 Operations manager

Disease outbreak can be extremely serious and must be treated as a high priority. This should be reflected in the Draft. The third bullet point states *"reporting to the proprietor on matters of compliance and disease outbreaks within 24 hours of first observation."* We recommend it be amended to ***"reporting to the proprietor on matters of compliance and disease outbreaks as soon as possible and no longer than 24 hours of first observation."***



Section 3.5 Vehicle driver

The vehicle driver should also monitor the ventilation in addition to the temperature of the vehicle. We recommend an amendment to the bullet point *“monitor the temperature within the transport vehicle to ensure it does not exceed a level that may compromise the health or wellbeing of any greyhound being transported.”* The suggested amendment is ***“monitor the temperature and ventilation within the transport vehicle to ensure it does not exceed a level that may compromise the health or wellbeing of any greyhound being transported.”***

Section 3.6 Veterinary practitioner

Annual vaccinations for all greyhounds should be mandatory and included in the written agreement between a proprietor and veterinary practitioner. Boarding kennels require this of all dogs. Kennel cough can be prevalent within the greyhound industry and annual vaccinations would improve this situation.

In regard to the greyhound establishment requiring annual inspections by an *“independent veterinary practitioner specialising in small animals,”* this is interpreted as a veterinary specialist which is not required and we believe this should be amended to ***“an independent small animal veterinary practitioner with greyhound experience.”***

Section 3.8 Staff health

We fully support a list of common zoonoses including hydatids be displayed throughout the greyhound establishment for staff education and we would appreciate the AVA being consulted to establish this list.

Section 4.1 Health management plan

We strongly support a health management plan formulated in consultation with a veterinary practitioner for each establishment and reviewed annually. To make it clear that a veterinary practitioner must review the health management plan, we suggest that the first sentence of this section is amended. The current sentence states *“Every establishment must have a health management plan in place which is reviewed annually.”* We recommend it be amended to ***“Every establishment must have a health management plan in place which is reviewed annually by a veterinary practitioner.”***



The mandatory annual health checks for each greyhound should include dental examinations and vaccinations. We would therefore like the following bullet points in the health management plan to be amended to reflect this:

- *vaccination programs; amended to **vaccination programs which include annual vaccinations for each greyhound at the establishment;***
- *dental management, including gum disease and plaque treatment programs; amended to **dental management, including annual dental examinations for each greyhound at the establishment, as well as gum disease and plaque treatment programs;***

A further bullet point should also be added:

- ***individual greyhounds that have had a testicle or testicles removed***

Section 4.2 Euthanasia

This section states that “*Euthanasia must not be performed in view of the general public.*” The AVA supports this view. Currently, not all greyhound racetracks have screens available for veterinarians to utilise so we request that Greyhound Racing Victoria (GRV) ensures that it is mandatory that each racetrack is equipped with a screen.

The paragraph that requires that “*GRV must be notified of an intention to euthanase any GRV greyhound where euthanasia is not on medical grounds*” either needs to define the term “*medical*” in the Definitions section as meaning both ***physical and behavioural conditions*** or alternatively rephrase the sentence as “***GRV must be notified of an intention to euthanase any GRV greyhound where euthanasia is not on medical or behavioural grounds.***”

Also in this section, it states that puppies 8 weeks and under requiring euthanasia must be euthanased by intraperitoneal (into the body cavity) or intravenous injection overdose of barbiturate. We have reservations about the use of intraperitoneal as it is very irritant and this is prohibited in many current guidelines for euthanasia. If this method is to remain in the Draft, it must be stated that pups must be deeply sedated prior to this method being employed.



Section 4.3 Greyhound transport vehicle

The paragraph states that *“Greyhounds must not be housed in a transport vehicle or at an event in a transport cage for more than 24 hours, except in exceptional circumstances where they may be housed for up to 48 hours.”* The size of the transport cage precludes the ability for the greyhound to turn around. Although the Draft states that the dog must be taken out every two hours, 48 hours of confinement in a transport cage is excessive and concerning. We cannot identify a circumstance where this is unavoidable. We recommend this sentence be amended to ***“Greyhounds must not be housed in a transport vehicle or at an event in a transport cage for more than 24 hours.”***

Section 5.2.1 Greyhound record files

In our opinion, earbrands and tattoos are usually applied without analgesia or anaesthesia and are unnecessary now that microchipping has superseded the need for this form of identification. We recommend a ban on this use of earbrands be incorporated in the final *Code of Practice for the Keeping of Racing Greyhounds*. We recommend the bullet point *“earbrands and other distinguishing features”* be amended to ***“distinguishing features.”***

GRV should be notified and it should be included in health management plans if a greyhound has had a testicle or testicles removed. Therefore, a further bullet point should be inserted:

- ***if a greyhound has had a testicle or testicles removed.***

Section 5.2.2 Individual greyhound identification

Currently the Draft requires that *“The name, description, sex, and microchip number of each greyhound in the establishment must be displayed clearly on every kennel or pen in the form of an identification card.”* For integrity purposes, we suggest an alternative identification system. For greyhounds not to be easily identifiable to those persons of a criminal nature, we would recommend a system where an identification number on the pen correlates to records of identification of each greyhound - with those identification records being kept elsewhere on the premises of the establishment.



Section 6.1.1 Food

The Draft states that *“The minimum quantity and nutritional quality of food must be detailed within the health management plan developed in conjunction with, and signed off by, a veterinary practitioner for each greyhound.”* We believe that a generalised food plan for the greyhound establishment is sufficient and only greyhounds that have special dietary requirements need be listed individually with their specialised food plan. A suggested amendment to the sentence is *“The minimum quantity and nutritional quality of food that the establishment would feed to all greyhounds must be detailed within the health management plan developed in conjunction with, and signed off by, a veterinary practitioner. Greyhounds that have special dietary requirements must be listed individually within the health management plan.”*

Section 6.2.1 Vaccination and parasite prevention – under 12 weeks of age

We suggest that a sentence be added to the last paragraph stating that *“Annual vaccinations are mandatory for each greyhound.”*

Section 6.2.2 Vaccination and parasite prevention – 12 weeks of age or older

A sentence in this section reads *“Vaccination against and testing for heartworm infection is recommended prior to admission or mating.”* There is no vaccination against heartworm. A correct restructure of this sentence is *“Medication to prevent against and testing for heartworm infection is recommended prior to admission or mating.”*

Section 6.2.3 Health checks and treatment plans

The section states that *“All breeding females must have a general health check by a veterinary practitioner within four weeks prior to each service period and within eight weeks of giving birth, or annually, whichever is the more frequent.”* As it is not possible to predict four weeks before a female may come into season, we believe it sufficient for the female to be assessed for breeding at each annual general health check. We suggest the following amendment: *“All breeding females must have a breeding assessment performed at each annual general health check by a veterinary practitioner and must also have a general health check within eight weeks of giving birth.”*



Section 6.2.5 Muzzling

There may be circumstances when basket muzzling may be required in housing pens for medical or behavioural purposes, i.e. to eliminate a greyhound removing bandaging or to stop a particular behaviour that could be detrimental to the greyhound. We suggest the first sentence “Greyhounds are not to be muzzled in housing pens” be amended to ***“Greyhounds are not to be muzzled in housing pens except under strict, documented, direction by a veterinary practitioner.”***

Section 6.3.1 Heritable defects

We concur with this section that safeguards against heritable breeding defects but we note that there is no inclusion on requirements on how to safeguard against heritable breeding defects when dealing with frozen semen. Frozen semen is commonly used for breeding within the greyhound industry and often procured from not only within Victoria but from interstate and overseas locations. We believe this area needs to be addressed.

Section 6.3.2 Breeding males

For health reasons, we believe that only males with two normal testes that are descended and present in the scrotum should be bred from. A sentence should be added to this section stating ***“To be assessed suitable for breeding, two normal testes that are descended and in the scrotum must be present.”***

Another suggestion for both this section and the following section on breeding females is that focus be given to the temperament of the greyhound when being assessed for breeding suitability. Speed, health and temperament should be the main considerations. An important purpose of this Draft is to ensure the welfare of racing greyhounds for their whole lives - not only whilst they are racing. It is critical to assess the temperament of breeding greyhounds to achieve the best chance of re-homing the greyhound after its racing career has concluded.

Section 6.3.5 Artificial Insemination

It is our view that only registered veterinary practitioners that are approved persons under the Frozen Semen Insemination (FSI) Program (administered by Greyhounds Australasia) be permitted to perform artificial insemination on greyhounds, whether via transcervical or surgical procedure. Any procedure that involves the insertion of anything in the nasal passage, nasal



sinuses, thoracic cavity, abdominal cavity, pelvic cavity, cranial cavity, spinal cavity, tooth alveolar cavity, eye, orbital cavity, tympanic cavity, joint spaces or any other synovial cavity of any animal, should only be performed by a veterinary practitioner.

Section 6.3.7 Caesarean section

We would like an extra paragraph added to this section after the first paragraph as we believe it is extremely important that it is adhered to. We suggest the following:

“Oxytocin must only be administered by or under directions from a veterinary practitioner and must not be used unless at least one pup has been delivered.”

Section 6.3.9 Rearing

We would like a paragraph inserted in this section that ensures that racetracks open and make available facilities that enable greyhounds to become conditioned for race day procedures, i.e. enclosures, kennels, scales, surfaces and ramps. Currently this is not occurring. This may need to be a directive from GRV to racetracks.

Section 6.3.12 Preparing a greyhound for retirement or rehoming

In the section of Preparation Weeks 5 and 6 we suggest that an extra bullet point be added to the current three listed to ensure appropriate behavioural learnings can be achieved:

- *acclimatised with environmental landscapes such as visiting dog parks, visiting busy shopping strips and being socialised with other dogs.*

Section 6.3.13 Retirement and rehoming of greyhounds

Before a veterinary practitioner makes an assessment and concludes that a greyhound cannot be rehomed, it is advisable that the history of rehoming attempts is considered if present. A further sentence is recommended after the first paragraph that reads *“Records on unsuccessful attempts to suitably rehome a greyhound, including agencies contacted must be retained by the proprietor and shared with a veterinary practitioner if requested.”*



Section 6.4 Exercise, training and enrichment

This section should include additional guidelines for socialisation of puppies from 8-16 weeks of age. This must include exposure to other animals, i.e. dogs of different breeds and ages, cats where feasible, children, adults and varied environments. This exposure can prepare them for a life outside racing where inevitably many will be destined. Whilst Section 6.3.12 is commendable, this transition would be easier if the greyhound had been exposed to such situations and interactions when younger. Successful adoptions will be increased if proper attention is paid to interactions during the socialisation period of puppies.

Section 6.4 Exercise, training and enrichment Table 1

We suggest that *The Environmental enrichment* requirement of *Rearing (16 weeks +)* that reads “*Must be bathed in warm water and towel dried once per month where weather allows*” be amended to “*Must be either groomed by being brushed or bathed in warm water and towel dried at least once per month.*” We consider this to be sufficient to achieve a healthy grooming regime.

In the *Lactating females Exercise requirement* of the table, we believe the requirement that “*Must be walked on a lead for a minimum of 20 minutes from seven days post-whelping*” should be amended to “*Must be walked on a lead for a minimum of 10 minutes daily from seven days post-whelping.*” Our concern is that the lactating female may fret and become anxious for her pups before the 20-minute minimum. The current statement also does not mention that this should be a daily requirement.

Further in the *Lactating females Environmental enrichment requirements* it states that the lactating female “*Must provide chew toys (for example, rope toys, squeaky toys, rubber toys, kong, bones etc.) rotated weekly.*” This is not realistic as she will be occupied with her pups. We recommend this requirement be deleted.

Section 6.6.7 Minimum housing requirements

As per our comment in Section 4.3, we cannot identify a circumstance where it would be unavoidable for a greyhound to remain in a transport cage for up to 48 hours. We recommend the same sentiment of deleting this reference as we did in Section 4.3.



Section 6.6.7 Table 3 Minimum pen sizes for indoor and outdoor housing

On page 63 it states: “*Note: on days when the greyhound is racing and the day following a race, there are no requirements to exercise the greyhound.*” We disagree with this statement and believe that the greyhound would benefit by gentle exercise the day after a race. This will improve the mental wellbeing of the greyhound and may aid in recovery from extreme exertion. We recommend the following amendment to this sentence: “***Note: on days when the greyhound is racing there is no requirement to exercise the greyhound. The day following a race, gentle exercise is recommended unless the greyhound requires resting.***”

Section 6.6.12 Whelping/lactating areas

We strongly disagree that the whelping and lactating housing must be maintained at a temperature between 10 and 32 degrees Celsius at all times. The lower temperature is far too cold and risks health issues. We recommend that the temperature at all times should be between **20 and 32 degrees Celsius**.

Appendix 2 – Preventing separation anxiety table

We don't think the column labelled *Indicators* makes sense. *Prevention of separation anxiety* is not an indicator. As there is a paragraph above the table that explains the purpose of the table, this column should be deleted.

AVA Contacts

- Dr Paul Martin - President, AVA Victorian Division
M: 0408 379 488 E: president.vicdiv@ava.com.au
- Ms Susan Chandler - Executive Officer, AVA Victorian Division
P: (03) 9600 2930 M: 0418 990 338 E: execvic@ava.com.au