



Queensland Division

Garden City Office Park

Building 3, 2404 Logan Road, Eight Mile Plains QLD 4113

Telephone: (07) 3422 5300 Facsimile: (07) 3423 1505

Email: avaqld@ava.com.au Website: www.ava.com.au/qld

17 June 2015

The Honourable Anastacia Palaszczuk MP
Premier and Minister for the Arts
PO Box 15185
City East
Queensland 4002

Dear Premier,

Response to the Queensland Greyhound Racing Industry Commission of Inquiry final report

The Australian Veterinary Association (AVA) is the professional organisation representing the full diversity of veterinarians working in Australia. Members of the AVA manage the majority of veterinary practices in Australia and the AVA has members within the pharmaceutical, rural and educational sectors delivering animal health, biosecurity and welfare outcomes for the community.

The AVA congratulates the government on acting speedily in establishing the Commission of Inquiry on 10 April, 2015. We are supportive of many of the recommendations made in the final report, but are also concerned about some opportunities that have been missed.

Recommendation to establish an independent statutory authority, the Queensland Racing Integrity Commission (QIRC)

The AVA supports independent regulation of racing as detailed in the AVA's submission into the inquiry. However, animal welfare and particularly the role of veterinarians need to have a stronger emphasis here. This comment applies to regulation across all racing codes.

As animal welfare was at the forefront of the genesis of this inquiry, the success of this independent authority would need to have this as a key priority for its functions. The report's model for this commission refers to intelligence and investigations and a number of other functions but linkages between functions are not clear. In particular, relationship to disciplinary proceedings and outcomes of investigations and who does the prosecutions appears to be absent from the model.

The AVA encourages the government to further explore the practicalities of establishing this commission. The final form of the commission, its role and powers should be developed in



Queensland Division

Garden City Office Park

Building 3, 2404 Logan Road, Eight Mile Plains QLD 4113

Telephone: (07) 3422 5300 Facsimile: (07) 3423 1505

Email: avaqld@ava.com.au Website: www.ava.com.au/qld

consultation with the community and industries. In particular, there needs to be a designated role for veterinarians in the commission, and in the greyhound industry itself.

The vital role of veterinarians

Veterinarians bring credibility, trust, independence, accountability and expertise to their work. They undertake professional responsibility to put the welfare of animals first, and both the regulatory and industry bodies need to be seen to be taking this seriously. This role is so important to the future credibility of the racing industries, that designated roles for veterinarians should be included in the statutory structure of these industries in the future.

For example, the recommended All Codes control body must include four independent members from accounting, law, business, commercial and marketing development fields. This structure does not allow for any expertise on animal welfare, the very issue that has caused such a massive upheaval in the industries. A fifth independent member who is a registered veterinarian should be added to the All Codes control body. Similarly, the QIRC would benefit from veterinarians being in strategic policy and intelligence roles at senior levels.

Confusion of animal welfare legislation (recommendation 3)

The AVA supports a review of the *Racing Act*, *Animal Care and Protection Act* and *Criminal Code*. At the point of submission of a complaint, it is confusing to the public who to complain to and more confusing for government authorities to know which Act to use in proceeding.

This is further complicated by the ACPA expressly stating that it does not affect the application of the *Racing Act* (section 7) and this statement is interpreted by government staff as any animal welfare issues in the racing industry to be dealt with by the *Racing Act*. However, the *Racing Act* and the rules of racing are greatly inadequate to deal with animal welfare offences. There are no definitions, no specific offences and no custodial penalties, just “warning off” and potential loss of licences. Animal welfare is referred to in a general sense in only a few places.

The AVA supports consolidation of animal welfare offences in a single act with appropriate penalties commensurate with the Criminal Code. The AVA understands that the Criminal Code is used for serious cruelty in order to be able to apply higher penalties.

Self-regulation and effective change

The structural changes in Racing Queensland will only be successful if self-regulation is kept to a minimum. Self-regulation works when a mature industry has demonstrated compliance

The Australian Veterinary Association Limited

ABN 63 008 522 852



Queensland Division

Garden City Office Park

Building 3, 2404 Logan Road, Eight Mile Plains QLD 4113

Telephone: (07) 3422 5300 Facsimile: (07) 3423 1505

Email: avaqld@ava.com.au Website: www.ava.com.au/qld

over a long period of time. The greyhound industry has not done this. There needs to be a comprehensive auditing role paid for by the industry, a no tolerance policy on any form of cruelty and a rapid response to all complaints.

The AVA recognises the value of the greyhound industry but it is critical to demonstrate and rebuild community trust in a transparent manner.

Thank you for considering our comments. We would be happy to discuss these responses and participate in ongoing strategic policy discussions with the government in this very difficult issue.

Yours sincerely

Michael O'Donoghue
President

Cc The Honourable William (Bill) Byrne MP
Qld Minister for Agriculture and Fisheries and Minister for Sport and Racing
GPO Box 46
BRISBANE QLD 4001

