

Code of Practice for the Keeping of Racing Greyhounds Draft

**DRAFT ONLY – 21
JULY 2017 – NOT
FOR SEPARATE
SUBMISSION**

**MARKED VERSION
– APPENDIX A to
Submissions of the
Greyhound Owners,
Trainers, Breeders
Association of
Victoria Incorporated**

**This mark-up MUST be
read with GOTBA Vic's
written submissions.**

**The non-mark-up of
matters in this Code is not
endorsement of them, and**

**those matters may be the
subject to separate
discussion in our
submissions.**



If you would like to receive this information/publication in an accessible format (such as large print or audio) please call the Customer Service Centre on 136 186, TTY 1800 122 969, or email customer.service@ecodev.vic.gov.au.

Published by the Department of Economic Development, Jobs, Transport and Resources

© The State of Victoria, 2017

This publication is copyright. No part may be reproduced by any process except in accordance with the provisions of the *Copyright Act 1968*.

Authorised by the Department of Economic Development, Jobs, Transport and Resources. 1 Spring Street, Melbourne 3000.

ISBN 978-1-925629-47-7 (print)

ISBN 978-1-925629-48-4 (pdf/online)

Disclaimer

This publication may be of assistance to you but the State of Victoria and its employees do not guarantee that the publication is without flaw of any kind or is wholly appropriate for your particular purposes and therefore disclaims all liability for any error, loss or other consequence which may arise from you relying on any information in this publication.

For more information about DEDJTR go to www.agriculture.vic.gov.au or phone the Customer Service Centre on 136 186.

Contents

1.	Introduction	1
2.	Definitions	2
3.	Staffing	10
3.1	Staff ratio	10
3.2	Proprietor	12
3.3	Operations manager	14
3.4	Greyhound attendants	16
3.5	Vehicle driver	18
3.6	Veterinary practitioner	19
3.7	Mandatory training and education	20
3.8	Staff health	20
4.	Establishment operation	21
4.1	Health management plan	21
4.2	Euthanasia	22
4.3	Greyhound transport vehicle	24
4.4	Visitor facilities	25
4.5	Security	25
5.	Records	26
5.1	Establishment records	26
5.2	GRV treatment record book	27
5.2.1	Greyhound record files	27
5.2.2	Individual greyhound identification	29
6.	Husbandry – Management of Greyhounds	30
6.1	Nutrition	30
6.1.1	Food	30
6.1.2	Water	31
6.1.3	Supplements and injectable substances	32
6.2	Health care	32
6.2.1	Vaccination and parasite prevention - under 12 weeks of age	32
6.2.2	Vaccination and parasite prevention - 12 weeks of age or older	33
6.2.3	Health checks and treatment plans	34
6.2.4	Grooming and other requirements	34
6.2.5	Muzzling	34

6.3	Breeding	35
6.3.1	Heritable defects	35
6.3.2	Breeding males	35
6.3.3	Breeding females	36
6.3.4	Natural Mating	37
6.3.5	Artificial Insemination	37
6.3.6	Whelping	37
6.3.7	Caesarean section	38
6.3.8	Lactating Greyhounds	38
6.3.9	Rearing	39
6.3.10	Education and pre-training	41
6.3.11	Training and Racing	43
6.3.12	Preparing a greyhound for retirement or rehoming	44
6.3.13	Retirement and rehoming of greyhounds	45
6.4	Exercise, training and enrichment	46
6.5	Socialisation and handling	50
6.6	Facilities	52
6.6.1	Disinfection and hygiene	53
6.6.2	Isolation housing	54
6.6.3	Tethering	55
6.6.4	Perimeter property fencing	55
6.6.5	Construction of housing pens and yards	56
6.6.6	Construction of indoor kennel facilities	57
6.6.7	Minimum housing requirements	58
6.6.8	Toileting yards	64
6.6.9	Exercise yards	65
6.6.10	Day yards	66
6.6.11	Mating areas	67
6.6.12	Whelping/lactating areas	67
6.6.13	Circular training facilities	69
6.6.14	Slipping tracks and galloping runs	69
6.6.15	Trial tracks	70
7.	Transfer and Sale of greyhounds	73
7.1	Sale or transfer of greyhounds out of the industry	74
7.2	Guarantee for sale or transfer of greyhounds out of the industry	75
8.	Hobby Establishments	76
	Appendix 1	77
	Appendix 2	79

1. Introduction

The purpose of the Code of Practice for the Keeping of Racing Greyhounds (Code) is to specify the minimum standards of staffing, accommodation, management, breeding and care required for the physical and behavioural needs of a racing greyhound throughout its lifecycle.

This Code is made under Section 63AC of Part 4AA of the *Domestic Animals Act 1994* (Vic) and applies to the keeping of all racing greyhounds registered with Greyhound Racing Victoria.

Compliance with this Code and its provisions is mandatory for any person who keeps a racing greyhound.

All Establishments used to keep racing greyhounds must also comply with state and local government legislation, and permits and guidelines issued or made under such law (such as GRV Rules).

2. Definitions

These definitions are provided solely for the purpose of interpreting this Code.

Act: means the *Domestic Animals Act 1994* (Vic).

Adolescent greyhound: means a greyhound between 16 weeks and 9 months of age.

Artificial insemination: means insemination of a female greyhound by any means other than natural mating.

Authorised officer: means a person appointed as an authorised officer under section 71, 71A, 72 or 72A of the Act.

Bed: means an impervious structure, raised off the level of the floor, that is sufficiently large enough to allow the greyhound to comfortably lie down when housed. The main component of a bed must not be constructed from concrete or metal.

Bedding material: means the material used to line a greyhound's bed to provide comfort and warmth.

Boarding: means the taking of custody or possession of the greyhound for keeping, accommodation, care, training or feeding for fee or reward.

Bullring: see Circular Training Facility.

Business hours: means an 8 hour period between the hours of 5 am and 8 pm on any given day, including weekends during which an establishment is in operation. Staffing during the business hours may be staggered in shifts over a 24 hour period to ensure that greyhounds can be fed at 12 hourly intervals where required.

Cage: means a structure designed for temporary containment of greyhounds.

Circular Training Facility: means a circular area used for greyhound education, training or fitness and includes a Bullring.

Code: means this Code of Practice.

Day yards: means those areas described in Section 6.6.10 of this Code.

DEDJTR: means Department of Economic Development, Jobs, Transport and Resources.

Disinfectant: means a chemical used on an inanimate object or surface to destroy micro-organisms that may cause harm to greyhounds.

Educator: means a person who educates or re-educates a greyhound to chase a lure or compete in a race and familiarises it with the race track environment before it progresses to racing with a trainer.

Enclosure: means an area fully secured by fences or barriers designed to prevent the escape of greyhounds from within and entry of animals from outside the area.

Enrichment: means practices that provide situations or activities for greyhounds that are designed to meet their physical and psychological needs, including any enrichment requirements outlined in this Code.

Establishment: means a property used to keep racing greyhounds.

Euthanasia Certificate: means a certificate provided by a veterinary practitioner setting out the matters listed at Section 4.2 of this Code.

Exercise: means practices and activities involving the physical activity and movement of greyhounds as appropriate to meet their behavioural and physical needs, including any exercise requirements outlined in this Code.

Experience: means the actual observation of or practical acquaintance with facts or events. [For the purposes of this Code, experience includes an accumulation of knowledge equivalent to or in excess of any training provided by DEDJTR.] **[GOTBA VIC: The last sentence is too imprecise.]**

First aid: means immediate care and treatment administered to a greyhound with an injury or illness. first aid does not include veterinary attention.

Full-time staff member: means staff members working 8 hours of work, such 8 hours being made up of either one staff member working a continuous 8 hour shift, or multiple staff members working divided shifts to the equivalent of 8 hours.

GAP: means the Greyhound Adoption Program operated by GRV.

General health check: means physical examination to assess the health of a greyhound, including but not limited to assessments for:

- medical conditions;
- musculoskeletal injuries;
- infectious and zoonotic diseases;
- internal and external parasites;
- dental, eye, skin and ear issues;

- [breed specific conditions and genetic abnormalities including heritable defects;]
- [age related conditions and ailments;]
- body condition scoring; and
- behavioural health issues including signs of stress, aggression, and stereotypies.

Greyhound: means a GRV greyhound.

Greyhound housing area: means all pens, kennels, cages and enclosures used to house greyhounds at the establishment, including areas where the greyhounds sleep, eat and spend the majority of their time. A greyhound housing area includes any isolation housing, whelping and lactating areas at the establishment.

GRV: means Greyhound Racing Victoria.

GRV greyhound: means a greyhound registered with GRV, including offspring of a greyhound under 7 days of age, except for a greyhound which has been retired outside of the industry through the GAP, or retired outside of the industry as a pet that is or should be registered with the local municipal council in which it resides. **[GOTBA Vic: See later: greyhounds are not registered with GRV by 7 days of age.]**

GRV registered greyhound owner: means the person who, for race winnings purposes, owns the greyhound.

GRV rule: means a rule made by GRV under or pursuant to the *Racing Act 1958* (Vic).

GRV participant: means a person that is registered with GRV, including a person registered as an owner, greyhound attendant, catcher, handler, educator, trainer, rearer or breeder of greyhounds.

GRV policy: means a policy developed by GRV.

GRV treatment record book: means a document under GRV Policies and/or Rules in which a GRV participant records all veterinary attention, health and behavioural requirements, including medical treatments, of a greyhound. ~~A GRV Treatment Record Book incorporates a health management plan which sets out any injectable administered from~~

~~any person, vaccinations and parasitic control, and will need to comply with any other GRV requirement within the GRV Policies and/or Rules.~~

Handling: means activities including grooming, soft patting/stroking, lifting the greyhound, ~~turning the greyhound over~~, providing exercise, enrichment and human socialisation for the greyhound and carrying out a physical health examination by inspecting the greyhound's paws, ears and teeth.

Heritable defect: means a physical deformity, disease or disorder that is passed on genetically from one generation to the next. [GOTBA VIC: See section 6.3 – we do not think this definition is appropriate for Code purposes.]

Hobby establishment: means a property that keeps no more than 2 greyhounds over the age of 16 weeks. [GOTBA VIC: See submissions: The code's conception of the hobby establishment is misguided.]

Housing acclimatisation program: means a program to acclimatise the greyhound to racing kennels as described in Section 6.3.9 of this Code. [GOTBA VIC: See later sections – we do not think this definition is appropriate for Code purposes.]

Humane euthanasia: means euthanasia where the greyhound is rendered immediately unconscious and does not regain consciousness prior to death.

Husbandry: means the care, management and breeding of greyhounds.

Impervious: means materials or sealed materials that prevent the penetration or absorption of water, urine or any other liquids.

Independent veterinary practitioner: means a veterinary practitioner who is not related by blood, marriage, or de facto relationship to the proprietor (or family member of the proprietor) of the establishment and has no commercial interest in the establishment.

Isolation housing: means kept in a separate area to general greyhound housing and exercise areas, used specifically to house greyhounds diagnosed with or suspected of having an infectious disease.

Kennel: means a series of pens designed to house multiple greyhounds or puppies.

Keep or Keeping or Kept: includes any one or more of the following activities in respect of a GRV greyhound:

- breeding;
- whelping;
- rearing;
- education (also referred to as breaking);
- training;
- racing;

- boarding; and
- any other activity that involves the care of a GRV greyhound.

Litter: means all offspring born dead or alive from a single whelping.

Material Safety Data Sheets: means a document that provides information on the properties of hazardous chemicals and how they affect health and safety in the establishment. [GOTBA VIC: See later sections – we do not think the later requirement for this is not appropriate.]

Mating: means the physical act of copulation between a male and female greyhound.

Mating period: means the period of time during which the series of mating events occur to achieve a pregnancy.

Monitoring or Monitored: means observation and assessment of greyhounds on a regular basis, including but not limited to, during routine management activities.

Muzzle: means a piece of equipment that is used to cover the nose and jaw area of a greyhound, which can include a wire cage muzzle, plastic muzzle, barking muzzle, basket muzzle or racing muzzle. The different varieties of muzzle are used for the following purposes:

- Barking muzzle - used to prevent barking in the greyhound.
- Basket muzzle - used to prevent biting and injury of the greyhound.
- Plastic muzzle - used to prevent biting and injury of the greyhound and made from plastic materials.
- Racing muzzle - used in the education, training and racing of greyhounds.
- Wire cage muzzle - used to prevent biting and injury of the greyhound and made from light weight metal materials.

Notice of Intent to Euthanase: means a notice submitted to GRV before the euthanasia of a greyhound in accordance with the requirements set out in Section 4.2 of this Code.

Operations manager: means a person responsible for the day to day operation of a greyhound establishment.

Overnight: means a continuous period of time outside of business hours.

Owner: includes a person who keeps or harbours the greyhound or has the greyhound in his or her care for the time being whether the greyhound is at large or in confinement. [GOTBA VIC: This is a misleading and inappropriate use and definition of 'owner' – in reality it will deem all other persons having care or custody of the greyhound at a point in time as the 'owner'.]

Pen: means a structure designed to house greyhounds or puppies.

Professional establishment: means a property that keeps more than 2 racing greyhounds. [GOTBA VIC: See submissions: The code's conception of the hobby establishment / professional establishment distinction is misguided.]

Proprietor: means a person who legally registers the establishment. [GOTBA VIC: The meaning of this is not clear at all – registers with who? How? Does not it mean the person who registers a property as a greyhound training property with GRV?]

Puppy: means a greyhound aged less than 16 weeks.

Qualifications: means a minimum formal qualification provided by a registered training organisation in the management, training, educating (including breaking) or breeding of Greyhounds. Completion of the GRV/ Animal Welfare Science Centre Training Course will be viewed as a 'Qualification' for the purposes of this definition. [GOTBA VIC: This has no presently known meaning.]

Racing: means to run swiftly or to compete in a race event.

Racing greyhound: see GRV greyhound.

Rearer: means a person who raises, socialises or commences the early education of greyhounds.

Rearing: means to raise a greyhound to maturity.

Slipping Track: means a straight yard area along which greyhounds can run.

Sell: means to barter or exchange and includes agreeing to sell, offering or exposing for sale, keeping or having in possession for sale, sending, forwarding, delivering or receiving for or on sale or authorising, directing, causing, suffering, permitting or attempting any such acts or things, in accordance with the definition of "sell" in section 3(1) of the *Wildlife Act 1975* (Vic) and as that definition is amended from time to time.

Service: means physical mating or artificial insemination of a greyhound.

Socialisation: means interaction between an individual greyhound and other animals (including greyhounds) and humans with the objective of making the individual greyhound fit for a life in companionship with others. Socialisation includes the requirements set out in this Code. _

Spelling: means a period of rest.

Staff: includes the owner, proprietor, operations manager, greyhound attendants, volunteers, whelpers, educators and/or rearers of greyhounds.

Training: means to teach, educate, instruct, and/or discipline a greyhound for a fee or reward.

Transfer or Transferred: means the change in location of a Greyhound including transfers related to the hiring out or leasing of a Greyhound. Applicable changes in location exclude ~~short distance~~ movements of a Greyhound associated with activities such as race or trial track attendance or attendance at a Veterinary Practitioner, among other things. **[GOTBA VIC: Greyhounds travel across the State (even for vet checks in some cases) and interstate for racing and training purposes.]**

Veterinary attention: means the examination and provision of appropriate treatment of a greyhound by a veterinary practitioner in accordance with the *Veterinary Practice Act 1997* (Vic).

Veterinary practitioner: means a veterinary practitioner registered under the *Veterinary Practice Act 1997* (Vic).

Weaned: means a greyhound puppy that no longer receives a milk diet provided by its mother or an artificial source.

Washable: means an impervious surface that is capable of being cleaned with liquids.

Weatherproof: means protection from the wind, rain and extreme temperatures to safeguard the welfare of greyhounds housed in an establishment.

Whelping: means the process of giving birth to greyhound puppies or “whelps”. The term “whelp” refers to a newborn greyhound puppy which lacks the ability to see, hear, or regulate its body temperature. Whelps need to be nursed by their mother until they start weaning.

Whelping Kennels: means housing for a whelping greyhound and her puppies up to sixteen weeks of age.

Whelping Pens: means pens designed to protect greyhound puppies during whelping and early life by keeping them safely contained, protected from cold, and safe from the danger of crushing or smothering by the mother.

Zoonoses: means diseases of animals transmissible to humans.

Greyhound classifications:

- adult female - 9 months of age or older;
- adult male - 9 months of age or older;
- retired and de-sexed female/male;
- pregnant female greyhound;
- whelping female greyhound;
- lactating female greyhound;

- pre-weaned puppy - less than 8 weeks of age
- orphaned puppy - less than 8 weeks of age, that is being provided milk or formula from an artificial source;
- weaned puppy - 8 to 16 weeks of age; and
- adolescent entire greyhound - between 16 weeks and 9 months of age.

Interpretation

In this Code:

- Where there are different or differently expressed obligations on a person at different places in this Code, those obligations are cumulative and all must be complied with. **[GOTBA VIC: The Code – to say the least – is no paragon of clear drafting. That a person needs to comply with related but different or differently expressed obligations in different places, under pain of conviction and fines of up to \$38,000 (individuals) and \$93,000 (bodies corporate), is highly inappropriate and is very poor regulation.]**
- A reference to legislation refers to that legislation as amended from time to time.
- A reference to a code, guidelines or another document issued by an industry or standard-setting body refers to that document as made at the date of this Code.

3. Staffing

[GOTBA VIC: See submissions. This is a bad re-write of clause 2 of the existing Code of Practice for the Operation of Greyhound Establishments. It introduces terribly unclear requirements and attempts to be unnecessarily prescriptive – including the need for employees and on-call staff – in doing so.]

~~All properties where greyhounds are kept must be compliant with the minimum staffing requirements set out in this Code.~~ Whether the property functions as a professional or hobby establishment, there must be a competent person responsible for the day-to-day management and care of the greyhounds. For large professional establishments, individual staff or competent persons may take on the roles or duties described below. For hobby establishments, the individual in charge of the greyhound is responsible for all the activities outlined below under Sections 3.2 (*Proprietor*), 3.3 (*Operations Manager*) and 3.4 (*Greyhound attendants*).

3.1 Staff ratio

[GOTBA VIC: See submissions.]

All establishments must employ the minimum number of staff suitably qualified or experienced to fulfil their obligations under this Code.

A minimum of one full-time staff member must be present onsite at the establishment during business hours for every 25 greyhounds (or equivalent) housed in the establishment. The staffing ratio must be maintained seven days per week.

A single (1) greyhound is equivalent to:

- one (1) greyhound over the age of 16 weeks that is individually housed; or
- a litter of puppies under the age of 8 weeks and their mother that are housed together; or
- a litter of up to ten (10) puppies over the age of 8 weeks housed together in a rearing pen; or
- a litter of up to four (4) adolescent greyhounds between the age of 16 weeks and 9 months housed together in a rearing pen.

For example, 25 greyhound equivalents may comprise of the following:

- fourteen female greyhounds, each without a litter (14);
- three male greyhounds (3);
- six separate litters under the age of 8 weeks residing with their mothers (6); plus
- two, six month old litters, each litter housed together in rearing pens (2).

This is equivalent to 25 greyhounds and therefore requires one full-time staff member during business hours.

A minimum of one staff member must be present onsite at the establishment during non-business hours where the establishment has 25 or more greyhounds (or equivalents) housed in the establishment.

Additional staff at ratio of 1 staff member for every 50 greyhounds (or equivalent) housed in the establishment during non-business hours must be available 'on call' to attend the establishment in the case of an emergency. On call staff must be able to travel to the establishment within 30 minutes of being contacted.

For example:

- For 25 greyhounds housed during non-business hours (overnight), there must be 1 onsite staff member present at the establishment;
- for 50 greyhounds housed during non-business hours (overnight), there must be 1 onsite staff member present at the establishment and 1 staff member on call and able to attend the establishment within 30 minutes of being contacted in the event of an emergency;
- for 100 greyhounds housed overnight, there must be 1 onsite staff member present at the establishment and 2 staff members on call and able to attend the establishment within 30 minutes of being contacted in the event of an emergency; or
- for 150 greyhounds housed overnight, there must be 1 onsite staff member present at the establishment and 3 staff members on call and able to attend the establishment within 30 minutes of being contacted in the event of an emergency.

The onsite, overnight staff must be available to care for whelping, sick or injured greyhounds and to undertake emergency activities if necessary.

For establishments with fewer than 25 greyhounds (or equivalent), there is no requirement for a full-time staff member, however, female greyhounds showing signs of labour or in labour must be monitored as per the requirements detailed in this Code, including as set out in Section 6.3.6 (Whelping).

Note

The overnight staffing ratio assumes that all exercise, enrichment, socialisation, handling, feeding, cleaning and general care activities are undertaken during business hours. Overnight staff are available only to care for whelping, sick or injured greyhounds that may need attention overnight and to undertake emergency activities should the need arise.

The staffing ratio during business hours assumes that staff may need to work in shifts to maintain feeding and cleaning routines throughout the day. Shift length for staff during business hours does not need to be a minimum of 8 hours, however the establishment must have the minimum Staff ratio for a period of 8 hours during business hours.

For example, an establishment with 80 greyhounds (or equivalent) may set up the following staff roster during business hours of 7.30 am–3.30 pm:

Monday to Friday

- 7.00 am–1.30 pm — Proprietor or Owner
- 7.00 am–3.30 pm — Operations manager
- 7.30 am–1.30 pm — Greyhound attendant 1
- 7.30 am–1.30 pm — Greyhound attendant 2
- 1.30 pm–7.00 pm — Greyhound attendant 3
- 1.30 pm–7.00 pm — Greyhound attendant 4
- 1.00 pm–3.30 pm — Greyhound attendant 5

Weekend

- 7.00 am–1.30 pm – Saturday —Operations manager
- 7.00 am–1.30 pm – Sunday — Proprietor or Owner
- 7.00 am–1.30 pm – Saturday & Sunday — Greyhound attendant 5
- 7.30 am–1.30 pm —Saturday — Greyhound attendant 3
- 7.30 am–1.30 pm – Sunday — Greyhound attendant 4
- 7.30 am–1.30 pm – Saturday & Sunday — Greyhound attendant 6
- 1.30 pm–7.00 pm —Saturday — Greyhound attendant 1
- 1.30 pm–7.00 pm – Sunday — Greyhound attendant 2
- 1.30 pm–7.00 pm – Saturday & Sunday —Greyhound attendant 7

Overnight the establishment may have the following staff roster:

- 3.30 pm–7.00 am —Proprietor or Owner

Operations manager or greyhound attendant 5, 6 or 7 to be available ‘on call’.

3.2 Proprietor

The proprietor of a greyhound establishment, who may or may not also be the owner, **GOTBA VIC: Use of owner does not match current definition in section 2.1** of the greyhounds at the establishment, is responsible for:

- the health and wellbeing of all greyhounds housed at the establishment;
- the overall management of the establishment;
- ensuring compliance with any relevant state or local legislation and codes of practice, including planning requirements or guidelines;

- ~~ensuring greyhounds are registered with GRV within seven days of birth and obtaining a GRV registration number and GRV treatment record book for each puppy;~~ **[GOTBA VIC: Not consistent with how or when greyhounds are registered.]**
- the overall level of hygiene in the establishment, including the disposal of waste materials;
- promoting and supporting relevant formal and informal training for staff;
- supervision of daily feeding, watering and inspection of all greyhounds;
- having a written agreement with sufficient veterinary practitioners to provide prompt veterinary attention for greyhounds other than first aid, and if necessary, euthanasia; and
- ~~the protection of staff health at the establishment;~~
- ~~the development and maintenance of an emergency management plan;~~
- ~~acting on reports from staff of any issues that affect the operation and management of the establishment; and~~
- ensuring the maintenance and retention of records; and ensuring that persons carrying out duties at the establishment (whether employed or otherwise) consequent upon these responsibilities are trained to and do carry them out. **[GOTBA VIC: See section 2.2 of the existing Code of Practice for the Operation of Greyhound Establishments]**

The proprietor must enter into a written agreement with one or more veterinary practitioners to undertake the veterinary ~~and health management planning~~ activities for the establishment. ~~The proprietor of an establishment must~~

~~have, and adhere to, a written health management plan that has been formulated in consultation with a veterinary practitioner and is reviewed on an annual basis and/or whenever a change in veterinary practitioners~~

~~occurs, whichever is more frequent.~~ Euthanasia must only be carried out at the greyhound establishment by a veterinary practitioner, except in emergency situations ~~where the operations manager may carry out humane euthanasia under the direction of a veterinary practitioner.~~ ~~All establishments must have an emergency euthanasia plan developed in conjunction with their veterinary practitioner set out in their health management plan.~~ **[GOTBA VIC: See submissions: section 4.]**

~~Where planning permission is not required under a Planning Scheme or the establishment is operating under the Planning Guidelines for Racing Dog Keeping and Training Facilities, the proprietor must notify their local council of the location of their establishment and number of greyhounds being kept.~~ **[GOTBA VIC: This code is NOT the place for any such requirement - bear in mind that greyhounds are tracked under the rules of greyhound racing. The Code should not prescribe requirements that are, if they exist, under other**

legislation, and thereby create additional penalties over and above what is contemplated in that other legislation/regulation.]

~~The proprietor may act as the operations manager or appoint a person to that role. If the proprietor does not have experience and qualifications in the management and breeding of greyhounds, they must employ an operations manager with appropriate experience and qualifications. If the proprietor is not registered under GRV rules to carry out the duties undertaken at the establishment, he/she must ensure a person or persons are so registered for the establishment to carry out those duties.~~

~~In circumstances where staff are not employed by the establishment, the proprietor must undertake all the duties of the operations manager and greyhound attendants as well as their own duties, as outlined in this Code.~~

Note

~~At any given establishment, the proprietor (who may also be the owner) can act as the operations manager and greyhound attendant. Similarly, the operations manager can act as a greyhound attendant at any time. That is, they can undertake the duties of another type of staff member.~~

3.3 Operations manager

[GOTBA VIC: There is no need to split roles out as per the below for the purposes of this Code (as opposed to GRV rules) – does the Code intend to make employees or persons undertaking these roles under direction of a proprietor directly responsible under the DAA for their breach?]

The section should be deleted – BUT for present purposes, adjustment has been made only to those items that are unnecessary or superfluous if a form of separate section was to remain.

The operations manager reports to the proprietor and is responsible for the day to day operation of the establishment which includes the following tasks:

- ensuring the health and wellbeing of all greyhounds in the establishment;
- reporting to the proprietor on matters of compliance and disease outbreaks within 24 hours of first observation;
- carrying out the directions of the veterinary practitioner;
- ~~identifying and monitoring pregnant greyhounds;~~
- (if applicable) supervision of the movement of pregnant greyhounds to whelping/lactating accommodation;
- supervision of staff and the provision of training;
- ~~maintenance and collation of records and statistics;~~
- supervision of daily feeding, watering, and inspection of all greyhounds;
- ~~supervision of daily environmental enrichment, exercising, handling, and training activities;~~
- maintaining the overall level of hygiene in the establishment, including the disposal of waste materials;

- ~~• implementing and maintaining the establishment's insect (e.g. flies, mosquitos), ectoparasite (e.g. fleas, lice, ticks) and vertebrate (e.g. rats, mice) pest management program;~~
- provision of prompt first aid and veterinary attention for greyhounds when required;

- ~~• responding to emergency situations applicable to both humans and greyhounds including the implementation of evacuation procedures;~~
- ~~• contributing to the development of and carrying out of the Establishment emergency management action plan in the event of an emergency;~~
- ~~• monitoring the physical and psychological health of greyhounds; [GOTBA VIC: See above inspection.]~~
- ~~• seeking relevant expert advice for adverse behavioural change in a greyhound; [GOTBA VIC: Mandating a need to obtain 'expert advice for adverse behavioural change' is inappropriate.]~~
- ~~• removal or disposal of greyhounds from the establishment;~~
- ~~• meeting the requirements to transfer or sell greyhounds;~~
- ~~• (if applicable) enacting retirement plans for retiring or retired greyhounds; and~~
- ~~• acting upon reports by staff about their responsibilities; and~~
- ~~• ensuring the greyhound transport vehicle meets the minimum standards set out in this Code.~~

~~To operate a greyhound establishment, an operations manager must have either the requisite experience or qualifications as those terms are defined in this Code and also show current competency in greyhound husbandry. Operations managers must be equipped with the necessary skills to meet the physical and behavioural needs of greyhounds in relation to mating, whelping, feeding, watering and general health and wellbeing. [GOTBA VIC: No. This should simply be a requirement to have/maintain registration under GRV Rules relevant for the tasks completed. Registration will have prescribed requirements.]~~

~~The operations manager of a greyhound establishment with fertile breeding greyhounds must provide evidence upon request by an Authorised Officer that they are competent in the husbandry and breeding of greyhounds. [GOTBA VIC: Registration under the rules of greyhound racing only.]~~

~~If an operations manager is in training and has not yet attained the necessary qualifications and/or experience required by this Code, they must operate under the direction of a veterinary practitioner. [GOTBA VIC: Not realistic or appropriate.]~~

~~The operations manager may also act in the role of greyhound attendant or appoint persons to that role.~~

3.4 Greyhound attendants

GOTBA VIC: There is no need to split roles out as per the below for the purposes of this Code (as opposed to GRV rules) – does the Code intend to make employees or persons undertaking these roles under direction of a proprietor directly responsible under the DAA for their breach?

Greyhound attendants working at the establishment must be registered with GRV or otherwise trained, experienced and competent in the management of greyhounds or animals generally **GOTBA VIC: There is no reason why an attendant working at an establishment needs greyhound specific knowledge per se. Many properties are in rural areas where animal expertise is more general.**

If greyhound attendants are not trained, experienced or competent, they must work under the direct supervision of the operations manager a person so competent or experienced, who remains responsible for their conduct. All trainee or volunteer greyhound attendants must work under the care and supervision of the operations manager.

6.6.7 Duties

Greyhound attendants are responsible for carrying out the following duties ~~and must report to the operations manager:~~

- daily feeding, watering and inspection of all greyhounds (including reporting physical injury, abnormality or significant behavioural changes in a greyhound to his/her supervisor as soon as practicable);
- ~~any dead greyhounds and the removal of bodies from the greyhound housing area;~~ **GOTBA VIC: This is not appropriate as a specific item and is offensive. Surely it is covered by overall establishment hygiene requirements**
- daily cleaning of greyhound housing areas by removing all faeces and soiled food, hosing out with water, replacing soiled bedding material and cleaning all feeding and drinking utensils;
- administering medication and treatment as prescribed by veterinary practitioner directed;
- routine disinfection of greyhound housing areas and equipment;
- exercising, socialising, handling and training of greyhounds as required by the operations manager;
- ~~provision of environmental enrichment for the greyhounds; and~~
- record keeping.

~~6.6.8 When immediate action must be taken by the greyhound attendant~~

~~The greyhound attendant must immediately take action as follows:~~

- ~~1) report to the operations manager any greyhound showing signs of pregnancy or whelping;~~

~~2) report to the operations manager any greyhound showing signs of any of the following injuries or illnesses:~~

~~— physical abnormality;~~

~~— change in normal behaviour indicative of an animal health or welfare concern;~~

[GOTBA VIC: Unnecessary – see minor changes above to overall duties.]

- signs of swelling, including apparent pain, heat, redness or loss of function;
- bleeding of body parts;
- tail injuries;
- ear or eye swelling, discharge and/or discomfort;
- bloating of the abdomen;
- difficulty or inability to urinate or defecate;
- red or brown coloured urine;
- symptoms of gum or dental disease including red, swollen or receding gums, yellow or brown crust near the gum line, or loose, missing or broken teeth;
- unusual gait, lameness, fits or staggering;
- inability to stand or walk;
- lack of appetite;
- increased thirst or urination;
- weight loss;
- patchy hair loss;
- mastitis;
- scratching of coat or ears;
- parasites or indicators of parasites; or
- any other signs that the health or wellbeing of the greyhound is compromised.

3) ~~isolate any greyhound showing signs of infectious disease or potentially infectious disease by moving the greyhound to isolation housing. Symptoms of infectious disease may include the following:~~ **[GOTBA VIC: See separate comments on isolation housing.]**

- coughing;
- vomiting;
- diarrhoea, especially if blood-stained;
- repeated sneezing;
- runny nose; or
- runny or inflamed eyes;

4) ~~after moving a greyhound to isolation housing as above, disinfect that greyhound's housing, bedding material and feeding and drinking utensils. Greyhound attendants must take precautions to avoid the spread of infection from one pen to another via their hands, clothing or footwear.~~ **[GOTBA VIC: See separate comments on isolation housing.]**

3.5 Vehicle driver

~~[GOTBA VIC: This should be removed – GRV Greyhounds are transported in accordance with transport policies under GRV rules.]~~

The driver is responsible for the welfare of greyhounds in the vehicle during transportation.

Any driver for the establishment must be experienced or adequately trained to carry out the following tasks:

- assessment, handling, and care of the greyhounds being transported;
- ensure the transport vehicle and related equipment is designed to meet the requirements under this Code ~~or GRV rules and policies~~;
- ensure the hygiene and cleanliness of the vehicle and the cages and equipment used within the transport vehicle is maintained, including routine cleaning and disinfection;
- ~~• clean and disinfect the cargo area of the transport vehicle according to infectious disease protocol after a greyhound showing signs of infectious disease has been removed, before the next greyhound is placed in the cargo area;~~
- ~~• inspect greyhounds at least every two hours during transportation, or more frequently on the advice of a veterinary practitioner and provide water at each interval; [GOTBA VIC: This mandating is not appropriate and takes no account of other factors, such as ability to stop, appropriateness of stopping in weather conditions etc. Bear in mind also, that greyhounds who travel to a track for racing are subsequently vet inspected.]~~
- clean cages used within the transport vehicle when necessary;
- ensure cages are secured within the transport vehicle; and
- 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.

~~Vehicle drivers must keep the transportation time of Greyhounds to a minimum, taking into consideration the most direct route available to the driver between the location of collection of the Greyhound and the ultimate destination.~~

The vehicle driver is responsible for maintaining a trip log book for all journeys longer than two hours. ~~[GOTBA VIC: Why? Note, again, that the natural incentive for greyhounds to be appropriately transported and that, in a majority of greyhound vehicle movements, the end point will involve a vet inspection. Adding a record keeping requirement has zero impact on the welfare of the greyhound.]~~

3.6 Veterinary practitioner

[GOTBA VIC: See submissions. Participants are required to have vet access agreements under GRV rules/policies for emergency treatment and access. However, the detail of the below is not appropriate, particularly noting that many relevant regional areas (Geelong, Bendigo) do not have (or have very limited) access to vets with experience in greyhound health or management or who will agree to come out to rural properties effectively on call.]

A written agreement must be entered into between a proprietor and veterinary practitioner who has relevant experience in greyhound health and management. This agreement must include arrangements for:

- the use of the veterinary practitioner's facilities for the treatment of greyhounds;
- the supervision of greyhounds in isolation housing at the establishment or the provision of isolation housing at the veterinary practitioner's facilities if the establishment does not have separate isolation housing;
- [GOTBA VIC: See submissions. A facility health management plan signed off by a vet is not a necessary or appropriate requirement in the context of an industry otherwise regulated by detailed rules and policies and whose animals are subject to regular welfare inspection.] ~~advice and development of the health management plan for the establishment;~~
- providing vaccination certificates and up to date health details for the GRV treatment record book of each greyhound ~~prior to that greyhound being transferred or sold;~~
- humane euthanasia in accordance with the requirements of Section 4.2 of this Code;
- ~~providing veterinary assistance for the establishment at all times and being able to provide veterinary attention to greyhounds at the establishment within six hours of notification that veterinary attention is required; and~~
- 24 hour contact or treatment or provision of services through an alternative 24 hour emergency practice.

Where the veterinary practitioner is also the proprietor or owner of the establishment, the establishment must undergo an annual inspection by an independent veterinary practitioner specialising in small animals. [GOTBA VIC: This is not appropriate – why must a vet appoint an independent vet, particularly if a vet contravening welfare obligations may also become subject to professional disciplinary action.] The inspection must review the health management plan for the establishment and the vaccination and health status of each greyhound at the establishment. - The outcome of the review must be signed by both the proprietor or owner of the establishment and the independent veterinary practitioner and submitted promptly to GRV.

Greyhounds housed for veterinary attention or isolation at a veterinary practice and under direct veterinary supervision may be housed in pens or cages contrary to this Code.

3.7 Mandatory training and education

All GRV participants in charge of and owners of racing greyhounds must complete minimum mandatory training and education as required for registration with GRV. Evidence that formal training has been completed must be available upon request by an authorised officer. **[GOTBA VIC: This should not be in this Code – its effect is to cause a breach of racing rules on this topic to be a matter for possible conviction and \$38,000 fine. In addition, the fact of qualification will be available on FastTrack (GRV online records) – production of records is unnecessary.]**

3.8 Staff health

Potential health risks for humans exist when working with animals. Greyhounds can harbour disease-causing organisms, which can be transmitted to humans (zoonoses).

To protect staff health, a list of common zoonoses including hydatids must be prominently displayed throughout the establishment and staff must be educated in the prevention of zoonoses.

Staff health must be protected through the provision of, or access to:

- an establishment induction session upon commencing work which provides information and training on health, hygiene and safety;
- tetanus immunisation;
- personal protective clothing and equipment (such as boots, coats, overalls, disposable gloves etc.);
- hot and cold hand washing facilities with soap; and
- hand disinfectant positioned at various locations around the establishment to allow staff to disinfect their hands between attending to different greyhounds.

4. Establishment operation

4.1 Health management plan

[GOTBA VIC: See submissions. Participants are already required to keep treatment records for their greyhounds, and certain details of greyhound health are kept on a greyhound's online records.]

A further facility wide health management plan, particularly one signed off by a vet (and changed/updated regularly) and containing the level of administrative detail referred to below, is not an appropriate allocation of resources and applies a burden to participants not commensurate with the adequate addressing of health or welfare of greyhounds in a person's custody, in light of the other record keeping obligations and welfare and other inspections occurring for GRV Greyhounds.]

Every establishment must have a health management plan in place which is reviewed annually. Health management plans must be formulated in consultation with a veterinary practitioner. Health management plans must be signed by a veterinary practitioner on an annual basis [or whenever there is a change in the veterinary practitioner supporting the establishment] [GOTBA VIC: This is not appropriate in the slightest.], whichever is more frequent.

The health management plan must include protocols for:

- ~~• assessment of new greyhounds before admission to the establishment;~~
- ~~• the quarantine and movement of greyhounds, including for new greyhounds introduced to the establishment;~~
- response to an outbreak of infectious disease at the establishment;
- management of isolation housing (where isolation housing is constructed at the establishment);
- hygiene, disinfection and disease prevention;
- vaccination programs;
- external parasite prevention and treatment programs including screening for fleas, ear mites, ticks, and ringworm;
- internal parasite prevention and treatment programs;
- ~~• dental management, including gum disease and plaque management;~~
- oral supplements and injectable substances regimes;
- ~~• grooming requirements;~~
- ~~• pest management protocols;~~
- ~~• housing acclimatisation program;~~
- the provision of an appropriate diet for all greyhounds at the establishment;
- exercise, ~~environmental enrichment~~ and socialisation programs;
- exposure to race day housing, pens or cages;

- ~~• intervention and management plans for greyhounds showing signs of stress and/or the development of behavioural stereotypes;~~
- processes for determining the suitability of breeding greyhounds to continue breeding within the establishment; GOTBA VIC: There are separate requirements to be met under GRV Rules – this should not be included.;
- (if applicable to the establishment) whelping greyhounds;

- ~~assessment programs for the health and welfare of greyhounds being reared for sale or as replacement breeding greyhounds;~~
- ~~health assessment of greyhounds for sale;~~
- ~~behavioural and welfare assessments of greyhounds on a daily basis;~~
- ~~processes for preparing a greyhound for retirement at any stage of its lifecycle;~~
- ~~processes for long term management of retired greyhounds, including protocols for assessing suitability for rehoming and desexing or euthanasia;~~
- ~~risk assessments of housing and exercise areas and risk management plans;~~
- ~~development and display of emergency management plans for both humans and greyhounds including evacuation procedures for the establishment;~~
 - ~~approved methods of euthanasia in emergency situations;~~
 - ~~identifying staff capable of carrying out humane euthanasia in emergency situations in circumstances where the operations manager is unavailable; and~~
 - ~~appropriate disposal of carcasses.~~

Note

Proprietors and operations managers should draft their health management plan prior to consulting their veterinary practitioner. This will reduce the time and cost associated with having the plan approved by a veterinary practitioner.

~~A checklist for the health management plan and guides for developing standard operating procedures (SOPs) can be found at www.vic.gov.au/pets.~~

4.2 Euthanasia

Euthanasia must be performed by barbiturate overdose carried out by a veterinary practitioner, except in emergency situations under the direction of a veterinary practitioner. Veterinary practitioners must provide the establishment with a Euthanasia Certificate once a greyhound has been euthanased.

~~In emergency situations, the operations manager or the staff member identified in the health management plan (if the operations manager is unavailable) may carry out humane euthanasia but only under the direction of a veterinary practitioner.~~

The veterinary practitioner providing approval to carry out euthanasia in an emergency situation must include a statement in the Euthanasia Certificate that permission was given, who permission was given to, when permission was given, why permission was given, and the approved form of euthanasia.

Any method of emergency euthanasia must be humane. **[GOTBA VIC: The section only contemplates barbiturate euthanasia or euthanasia under the direction of a vet – reference to blunt force trauma is unnecessary, and offensive.]** ~~Blunt force trauma is not considered a humane form of euthanasia for greyhounds.~~

~~Euthanasia must be performed in an area that is separate from any greyhound housing area at the establishment and must not be carried out in view of any other greyhounds.~~

~~Euthanasia must not be performed in view of the general public.~~

GRV must be notified of an intention to euthanase any GRV greyhound where euthanasia is not on medical grounds, at least 14 days prior to carrying out the euthanasia by providing a Notice of Intent to Euthanase to GRV

All owners must provide the Euthanasia Certificate (as outlined above) to GRV once euthanasia has been carried out.

~~Puppies 8 weeks and under requiring euthanasia must be euthanased by intraperitoneal (into the body cavity) or intravenous injection overdose of barbiturate by a veterinary practitioner as per the American Veterinary Medical Association (AVMA) Guidelines for the Euthanasia of Animals.;~~ **[GOTBA VIC: See above re euthanasia being by a vet or under vet direction. The Code should not tell vets how to do their job.]**

Note

~~In an emergency situation, the establishment proprietor, owner, operations manager or greyhound attendant must attempt to contact the veterinary practitioner by phone and request advice. If the veterinary practitioner is unable to provide veterinary attention within a reasonable amount of time, or provide suggestions with respect to alternative care and both the veterinary practitioner and proprietor/owner/operations manager/greyhound attendant agree that immediate euthanasia is required, the operations manager or the staff member identified in the health management plan may carry out that euthanasia in a manner agreed to by the veterinary practitioner. A template euthanasia certificate and a template notice of intent to euthanase is available at www.vic.gov.au/pets.~~

4.3 Greyhound transport vehicle

[GOTBA VIC: See submissions. Participants are subject to GRV transport policy requirements. There is no reason to repeat – and/or vary – the same here. This should be deleted.]

All transport vehicles or trailers used to transport greyhounds must;

- be maintained at a temperature of between 10°C and 32°C at all times;
- be constructed of materials and a design that allows for effective cleaning and disinfection; and
- transport trailers must have a secure means of attaching to a vehicle so as to prevent separation during travelling.

Where one or more greyhounds are being transported, vehicles or trailers used for transport must have provision for the greyhound/s to be physically separated and restrained or individually enclosed by compartment or cage that is:

- of a design that is escape-proof, prevents the protrusion of head and/or limbs of any greyhound and prevents the risk of entanglement of collars and leads;
- the compartments or cages should be securely fixed to the vehicle and allow enough space for greyhounds to sit, lie down and stand in a natural position without making contact with overhead structures;
- weatherproof with adequate ventilation, both when the vehicle is stationary and in motion; and
- constructed of materials and a design that allows for effective cleaning and disinfection.

Other than in cases of exceptional circumstances or emergency, greyhounds must be physically separated and individually restrained during transport or transported in separate compartments or cages.

Greyhounds must not be transported in the cabin of transport vehicles or in a transport trailer unless restrained or enclosed in a compartment or cage that complies with the provisions outlined above. [GOTBA VIC: Single greyhounds must be able to be transported in ordinary vehicles, without separate cages.] A greyhound MUST NOT be transported in the boot of a sedan. [GOTBA VIC: This is offensive but it is understood that the requirement appears in other dog codes.]

Greyhounds must not be left unattended in a vehicle or trailer for any extended period. [During transportation, greyhounds must be inspected at least every two hours or more frequently on the advice of a veterinary practitioner, and provided with water at each inspection]. [GOTBA VIC: This requirement is not appropriate for mandating. See above 3.5] Greyhounds must not be able to distract the driver or cause injury to other greyhounds or occupants in the vehicle in the event of an accident.

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.

[All greyhounds housed in transport cages must be removed from the cage every two hours during daylight hours to exercise and toilet. All greyhounds housed in transport cages must be exercised at least four times within a 12 hour period during daylight hours for at least 20 minutes at each exercise interval.] [GOTBA VIC: This would make interstate transport of greyhounds unfeasible – including by commercial airline transport from, say, Melbourne to Brisbane - and is in any event unnecessary for welfare purposes. It should simply be deleted]

Confinement in a transport cage under any other circumstances must only be at the direction of a veterinary practitioner.

4.4 Visitor facilities

Visitors to the establishment must be provided with access to hot and cold water hand washing facilities with soap or hand sanitising stations.

~~Biosecurity policies within any establishment should be adhered to. This includes the provision of foot baths and/or boot covers for visitors entering the establishment who have been in contact with other animals.~~

4.5 Security

Establishments must securely confine all greyhounds within the property, preventing their escape. [Establishments must also be protected from entry of unwanted animals by the construction of suitable perimeter fencing as outlined in this Code]. [GOTBA VIC: This is not a known problem (if the Department has information suggesting it is, please publish it) and creates significant cost issues for participants – particularly regional ones.]

Kennel areas must be able to be securely locked.

Each individual kennel, cage, or pen must be fitted with a secure closing device that can only be opened by humans.

All security methods must allow for ready access to greyhounds and exit of staff and greyhounds from the establishment in the event of an emergency.

~~There must be a minimum of two physical barriers between greyhounds and escape. Where greyhounds are housed in kennels, the door of a greyhound's pen is considered the first barrier to escape.~~

All designs and materials must ensure the security of the establishment. Greyhounds must be safe from attack, stress or injury from other greyhounds, animals or people. [GOTBA VIC: This is a truly nonsensical provision in a Code carrying prospect of conviction and penalties for its breach. We understand that this is in section 3.6 of the existing Code of Practice for the Operation of Greyhound Establishments. In this instance, it does not matter.]

5. Records

[GOTBA VIC: See submissions. This Code creates a pea soup of record-keeping in respect of the GRV Greyhound, considering the record keeping requirements under the GRV Rules. Other than those requirements, any further Code records should be minimal, and capable of being kept within the bounds of the GRV required records.]

Again, provided an establishment when inspected has healthy greyhounds with evidence of compliance with GRV record keeping requirements, then further facility wide records, particularly containing the level of administrative detail referred to below, is not an appropriate allocation of resources and applies a burden to participants not commensurate with the health or welfare of greyhounds in a person's custody, in light of the other record keeping obligations and the welfare and other inspections to which the participant is subject.]

The proprietor of the establishment must ensure that the records detailed below are collected and kept for a period of no less than 12 months after a greyhound has left the establishment. [GOTBA VIC: Why?]

If the establishment ceases to operate, all greyhound health and sale records must be retained by the proprietor for no less than five years. [GOTBA VIC: Why this long?]

All records must be kept at the establishment in a location that allows for physical inspection by an authorised officer immediately upon request.

All records must be produced for physical inspection by an authorised officer immediately upon request, either electronically or in hard copy.

5.1 Establishment records

Greyhound establishment records must include the following:

- GRV participant registration number (where applicable);
- copies of all standard operating procedures for the establishment;
- ~~• emergency management and evacuation plans for the establishment including site maps;~~
- ~~• the establishment's insect, ectoparasite and vertebrate pest management program and evidence that the program is being maintained and adhered to;~~
- ~~• a complete and up to date list of staff working at the establishment including the following details for each individual staff member—contact details, experience and/or qualifications, training history and tetanus immunisation status or exemption certificate where appropriate;~~
- ~~• a complete copy of all records relating to staffing on a daily basis, for example a daily staff roster (where appropriate);~~
- ~~• the current health management plan for the establishment;~~
- the written agreement/s with the veterinary practitioner and complete

contact details of both the general veterinary practitioner and emergency veterinary practitioner (where different);

- ~~• other contracts and contact details of external greyhound service providers. For example, feed suppliers, meat suppliers, pest controllers, physiotherapists, chiropractors etc.;~~
- all records related to selling, transferring (both temporary and permanent) and/or giving away of greyhounds to and from the establishment;

- ~~a complete copy of the sale and transfer health and management statement by the operations manager (within the GRV treatment record book);~~
- a copy of the veterinary practitioner's general health certificate for greyhounds sold, transferred or given away to a new owner; and
- ~~a copy of literature provided to a new owner regarding the care of a greyhound where sold, Transferred or given away to a member of the public that is not a GRV participant;~~
- all records relating to the purchase, acquisition or transfer of greyhounds into the establishment, including the contact details of the previous owner and operations manager, the greyhound's previous location, microchip number, copies of transfer of ownership papers (where applicable) and up to date GRV treatment record book at time of transfer to the establishment; and
- ~~[a copy of the transport vehicle/s log book.~~

Where staff are employed by the establishment, a complete set of daily staffing rosters must be kept for a period of no less than 12 months. [GOTBA VIC: Why?]

5.2 GRV treatment record book

All treatment records of any type must include the date and time of the treatment administered, person prescribing the treatment, dosage and details of treatment, and any relevant observation of the greyhound during and post treatment. The name and signature of the person administering the treatment must also be recorded.

~~Records of daily observations, inspections and exercise, in accordance with the requirements of this Code, must be kept for a period of no less than 12 months.~~

5.2.1 Greyhound record files

A Greyhound record file must be established for each individual greyhound at birth and maintained according to the following requirements until the ownership of the greyhound changes or the greyhound is deceased. [GOTBA VIC: This cannot be done from birth – it could only be done after individual identification (earbrand/microchip).]

All greyhounds must be registered with GRV by seven [GOTBA VIC: Not correct] days of age and allocated a GRV treatment record book, which must be kept up to date at all times and maintained at the establishment where the greyhound is kept. Copies of records of greyhounds sold by or retained by the establishment must be kept for a period of no less than 5 years. [GOTBA VIC: Why? We note that elements – but not all – of this are in the current Code of Practice for the Operation of Greyhound Establishments (at section 4), but the extent of this broader requirement is not appropriate.]

[GOTBA VIC: This is a matter for the GRV Rules – it should not then also be dealt with in a Code with criminal consequences and penalties. The below should be deleted.] The proprietor of the establishment must ensure that the following details are recorded in the GRV treatment record book and with GRV for each greyhound:

- name of dam, registration details, date of birth and any other relevant details including earbrands;
- name of sire, registration details, date of birth and any other relevant details including earbrands;
- birth date;
- sex and reproductive status (entire or desexed);
- colour;
- earbrands and other distinguishing features;
- service/insemination dates (where applicable);
- whelpings (where applicable);
- litters born (dead or alive, or combination);
- number of puppies per litter and their GRV registration numbers;
- a complete health care and veterinary history including:
 - vaccination records and matching vaccination certificates;
 - internal and external parasite control;
 - heartworm records;
 - oral supplements and injected substances records; and
 - administration of any Schedule 2, 3, 4 or 8 drugs (by date, time, dose, route of administration, drug name and name of person giving the drug).
 - name and address of new owner or new care giver (in the case of a transfer);
- date of rehoming to a pound, shelter or member of the public and/or date of euthanasia and disposal;
- health and management statements for all transfers of the greyhound between establishments and owners; and
- disposal, euthanasia and death records including date and method of disposal, cause of death and a copy of the Notice of Intent to Euthanase and Euthanasia Certificate submitted to GRV.

An up to date GRV treatment record book containing current vaccination certificates must be provided for each greyhound before admission for boarding, rearing and/or education and training.

In addition to the records kept in the GRV treatment record book [GOTBA VIC: Why?], the following information must be recorded relating to each greyhound admitted for boarding, rearing and/or education and training:

- the name of the owner;
- contact telephone number, address and GRV registration number of the owner or the owner's authorised representative;
- a description of the greyhound including:
 - and microchip details;
 - details of condition on arrival which is to include weight and photo as evidence;
 - date of admission;
 - expected date of collection;
 - details of medical, dietary, bathing and grooming requirements and physical condition;
 - exercise, enrichment, socialisation and handling history and management statement for that greyhound;
 - any collars, leads or belongings brought in with the greyhound;
 - name and contact telephone number of the owner's veterinary practitioner; and
- any behaviour changes.

Written permission of owner/s must be obtained before housing two or more greyhounds together in a pen during boarding. [GOTBA VIC: This should be left to the discretion of the rearer/boarder (or if such a restriction was to apply, it is a private matter between owner and boarder). Housing more than 2 greyhounds together may be perfectly acceptable animal husbandry practice.]

5.2.2 Individual greyhound identification

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. [GOTBA VIC: This is wholly inappropriate and is a SIGNIFICANT security and integrity risk. Usual practice is to display only the kennel name without other identifying features. This mitigates the risk of tampering with the greyhound. An inspector can check the greyhound's microchip (cross-checking against GRV records) to confirm identity.]

Each identification card must also indicate whether the greyhounds are receiving additional care and the type of care. For female greyhounds, this includes the number, birthdate, sex and details of offspring in her current litter. [GOTBA VIC: Why not simply in other records - FastTrack.]

Kennel or pen cards are not required if the greyhound is being housed in a residential premises (a home). [GOTBA VIC: See hobby establishment section – the entire Code betrays a total lack of understanding of the hobby/professional distinction. Very, very few hobbyist greyhound establishments would have a racing greyhound reside in the home.]

6. Husbandry

– Management of Greyhounds

This section outlines minimum standards for husbandry management of greyhounds. [GOTBA VIC: See submissions. The Code does not do what this sentence says. Instead, it outlines prescriptive activity requirements with little regard to the realities of rearing or training a greyhound, some of which are positively dangerous to the welfare of individual greyhounds.]

6.1 Nutrition

6.1.1 Food

[GOTBA VIC: See submissions: Note that section 3.1 of the existing Code of Practice for the Operation of Greyhound Establishments states the requirements for food and water in 3 short paragraphs.]

All greyhounds must be fed at least once daily. Food must be provided in sufficient quantity and nutritional quality. Food must be canine appropriate and scientifically balanced to meet the daily requirements for the condition, age and size of the greyhound. [GOTBA VIC: This paragraph is an excellent general description and is appropriate as is.]

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. [GOTBA VIC: This is unrealistic and quite frankly ridiculous. Greyhounds, like people, have varying requirements – even varying minimum requirements – depending on size, gender, activity level and even metabolism. Why one would need to record this in a signed off health management plan – again when greyhounds are regularly inspected and, for racing greyhounds, weight is measured and recorded at each start?]

[Food must be provided in a food receptacle that has been cleaned of all previously uneaten food except where providing food as enrichment in a treat ball or kong, or when providing bones.

Food receptacles must be made of a material that can be cleaned and disinfected and must be designed to prevent food being spilled onto the ground.

Food receptacles must not cause injury to the greyhounds. [GOTBA VIC: Why should a Code state such things? Is there any evidence of such risks in the Victorian greyhound industry?]

Pregnant and lactating greyhounds must be fed from a food receptacle at least twice daily, or fed under the direction of a veterinary practitioner.

Puppies from three weeks of age to weaning must be provided with appropriate food in a shallow food receptacle [according to the establishment's health management plan]. [GOTBA VIC: As above.]

Fully weaned puppies less than 16 weeks of age must be fed from a food

receptacle a minimum of three times daily with a nutritionally balanced diet and must not be without food for a period of more than 12 hours. [GOTBA VIC: This is a matter of animal management.]

Puppies may share a food receptacle.

Orphaned and pre-weaned puppies must be fed under the direction of a veterinary practitioner.

Greyhounds between four and six months of age must be fed a minimum of twice daily with a nutritionally balanced diet from a food receptacle and must not be without food for a period of more than 12 hours. [GOTBA VIC: This is a matter of animal management. It should be noted that the reality of greyhound establishments – particularly those where the hobbyist may attend, say a twilight race meeting with a greyhound from their property – is that greyhounds may be fed at wider than 12 hour intervals. A prescriptive requirement such as this is not prudent or appropriate.]

Greyhounds over the age of 16 weeks must be provided with their own food receptacle. [GOTBA VIC: Why? It is perfectly acceptable to feed together – subject to the establishment operator being satisfied that the relevant greyhounds are receiving adequate nutrition.]

Feeding raw offal to greyhounds is not recommended, as it is a zoonotic risk to humans. If greyhounds are fed raw offal, it must be part of the establishment's health management plan and be in conjunction with a complete worming program.

Food must be stored appropriately in sealed containers, which must be vermin proof and refrigerated at less than 4°C where required. Food storage equipment and areas must be regularly cleaned and disinfected.

Food, bones or treats must not be allowed to become rancid, decayed or insect-infested.

The preparation of food must be conducted in hygienic areas that are cleaned and disinfected after food is prepared.

At any time the establishment must hold a minimum of five days' food supply that is sufficient to feed all greyhounds housed in the establishment and to ensure food is available for the animals in the case of an emergency event such as illness, accident or large scale emergency. **[GOTBA VIC: Why? This is a matter of animal management. It does not reflect the way that participants may organize their own affairs. We have been unable to identify any examples of establishments at which lack of back-up food supply has represented a welfare issue.]**

6.1.2 Water

Greyhounds must have access to a sufficient supply of fresh clean water at all times. **[GOTBA VIC: Greyhounds (appropriately) do not have this while kennelled at a race track in Victoria, for example.]** The recommended volume of water required daily is approximately 50 millilitres of water per one kilogram of body weight (for example 1.5 litres per day for a 30 kg greyhound).

This amount may vary depending on a number of factors including health status, environmental temperature, amount of exercise, lactation status, water content of diet, age, etc.

Young puppies, from three weeks of age, must be provided with access to water in a suitable receptacle.

Water receptacles:

- must be non-spillable, made of a material that can be cleaned and disinfected, **[and of a design that does not cause injury to the greyhounds]; [GOTBA VIC: ?.]**
- must hold sufficient water for all greyhounds;
- must be large enough to hold sufficient water for all greyhounds to be able to drink at any one time; and **[GOTBA VIC: Contrast to the separate food receptacle requirement.]**
- for young puppies, must be shallow enough to prevent injury or drowning. **[GOTBA VIC: Really?]**

6.1.3 Supplements and injectable substances

All supplements and injectable substance regimes, including dosing, must be detailed in the ~~health management plan and~~ GRV treatment record book for each greyhound according to greyhound age and stage of life cycle. ~~The health management plan must be approved annually by a veterinary practitioner.~~

Any supplements and injectable substances must be individually labelled and kept in their original container or packaging. All supplements and injectable substances must be able to be easily identified.

All expired supplements and injectable substances must be disposed of according to relevant legislative requirements.

6.2 Health care

6.2.1 Vaccination and parasite prevention

- under 12-16 weeks of age -

[GOTBA VIC: initial inoculations may occur up to 16 weeks (generally by 14 weeks, not 12).]

[GOTBA VIC: See submissions: Note that section 3.2 of the existing *Code of Practice for the Operation of Greyhound Establishments* states the requirements for vaccination in 4 short paragraphs.]

Except where a veterinary practitioner advises and records that treatment would prejudice the greyhound's health, puppies must be vaccinated against and treated for the following:

- Canine Distemper;
- Infectious Canine Hepatitis;
- Canine Parvovirus;
- Canine Cough (parainfluenza (Type II) and *Bordetella bronchiseptica*); and
- Internal and external parasites (for example worms, fleas and ticks).

All vaccinations must be given in accordance with the manufacturer's recommendations.

First treatment/vaccine must not be given before 10 days of age.

Vaccination certificates, including dates of next treatment, details of the treatment required and a record of who administered the treatment, must be signed by a veterinary practitioner at each vaccination and recorded in the greyhound's GRV treatment record book.

6.2.2 Vaccination and parasite prevention

- 12-16 weeks of age or older

Except where a veterinary practitioner advises and records that treatment would prejudice the greyhound's health, all greyhounds 16 weeks of age or older must have current vaccination against and treatment for the following:

- Canine Distemper;
- Infectious Canine Hepatitis;
- Canine Parvovirus;
- Canine Cough (parainfluenza (Type II) and *Bordetella bronchiseptica*);
- Heartworm; and
- Internal and external parasites (for example worms, fleas and ticks).

All vaccinations must be given in accordance with the manufacturer's recommendations.

Any off-label vaccination use must be in accordance with the Australian Small Animal Veterinary Association (ASAVA) guidelines.

Vaccination certificates, including dates of next treatment, details of the treatment required and a record of who administered the treatment, must be signed by a veterinary practitioner at each vaccination and recorded in the greyhound's GRV treatment record book.

An up to date GRV treatment record book containing current vaccination certificates must be produced for each greyhound being kept ~~before admission-~~test an establishment. Vaccination against and testing for heartworm infection is recommended prior to admission or mating.

Greyhounds must be placed on a safe and proven effective worming prevention and flea program with records of such programs kept in the greyhound's GRV treatment record book.

Isolation housing for isolation of greyhounds suspected of having or diagnosed with an infectious disease must be available either at the establishment where the greyhounds are kept or at veterinary premises. [GOTBA VIC: This is a matter of animal management. It may be that neither vets nor participants have isolation housing.]

Greyhounds with illnesses that are not infectious or injuries must be separated, but not necessarily isolated, from other greyhounds where separation will reduce stress in the greyhound.

6.2.3 Health checks and treatment plans

All greyhounds, regardless of breeding status, must have a general health check by a veterinary practitioner at least annually, or more frequently as directed by a veterinary practitioner. [GOTBA VIC: See submissions. This is a matter of animal management – an obligation to go to a veterinary practitioner should be solely based upon observation or need identified by the relevant participant.]

All greyhounds must have a general health check by a veterinary practitioner prior to their first service. Veterinary practitioners must provide a certificate to state that, at the time of examination, the greyhound was suitable to breed. [GOTBA VIC: This is dealt with in the GRV Rules (pink card requirements for breeding females).]

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 more frequent. [GOTBA VIC: See above. In addition, the timeframe does not work – one does not know when a bitch will come on season.]

Any health issues identified must be recorded in the greyhound's GRV treatment record book and evidence provided that a treatment plan was devised in conjunction with a veterinary practitioner and implemented and recorded in the greyhound's GRV treatment record book.

All establishments must have an internal and external parasite control program and screen regularly as per the establishment health management plan. [GOTBA VIC: Why duplicate this here?]

6.2.4 Grooming and other requirements

All greyhounds must be groomed by brushing or bathing, whichever is necessary, at a frequency that ensures coats are kept in good, clean condition.

All greyhounds must have their toenails checked and trimmed at a frequency that prevents overgrowth.

6.2.5 Muzzling

Greyhounds are not to be muzzled in housing pens. [GOTBA VIC: Not appropriate: there may be perfectly reasonable (and welfare positive) reasons why muzzling (other than bark muzzling) may be appropriate in housing pens, including as part of educating a puppy or new greyhound to kennels not to chew (and/or eat) bedding. Such muzzling under control of the participant is not cruel (the greyhound can pant and drink).] Basket muzzling during toileting, socialisation and group exercise is acceptable as a means of acclimatising greyhounds to muzzles for racing. However, greyhounds must not be muzzled for more than 30 minutes at a time during these activities. [GOTBA VIC: This makes no sense – greyhounds wear muzzles (albeit usually wire cage muzzles, it is unclear whether these are also 'basket muzzles' as used in the Code) for more than 30 minutes very often (for example, at a race track a greyhound will wear one for at least this long when being taken from kennels, vetted, toileted, raced, washed and re-kenned), without any issue.]

Barking muzzles must not be used except under strict, documented, direction by a veterinary practitioner. Barking muzzles must not be used for a period of more than five minutes at a time and no more than twice per day. **[GOTBA VIC: If use is under vet direction, then imposing other requirements makes no sense and may impede the directed treatment.]** Barking muzzles prevent drinking and panting which are essential for hydration and temperature regulation.

6.3 Breeding

Breeding mates must not be closely related to one another, such as father-daughter, mother-son, brother-sister, grandfather-granddaughter etc.

[GOTBA VIC: Breeding occurs in accordance with GRV Rules and Policies. This Code should not deal with breeding restrictions over and above this, or if it does, then on the basis that compliance with those GRV Rules is deemed compliance with the Code.]

6.3.1 Heritable defects

All breeders must comply with the *Prevention of Cruelty to Animals Act 1986* (Vic), particularly with respect to the *Code of Practice for the Responsible Breeding of Animals with Heritable Defects that Cause Disease*.

[GOTBA VIC: The definition of 'heritable defects' is far too broad. By and large, greyhounds as a breed are free from serious heritable diseases. There is an obvious market imperative not to breed or continue to breed with greyhounds who might throw such diseases.]

However, there are significant breeding lines in Australia – producing numerous champion racing greyhounds – from greyhounds who have or produce offspring with, for example, one testicle or undershot jaws, which likely meets the definition of 'heritable defect' in this Code (a physical deformity passed genetically from one generation to the next). It is absolutely inappropriate to prevent this.

The proprietor or owner of any establishment notified that a greyhound sold by the establishment has been diagnosed by a veterinary practitioner as having a heritable disease or defect, or provided with reasonable evidence of a heritable disease or defect in the greyhound, must stop breeding from the parents of the greyhound until the following have been completed: [GOTBA VIC: Absolutely unacceptable that a single notification can stop breeding. This drafting also assumes – presumably because of where this Code has come from – that the establishment owner owns both the male and female. This will very rarely be true and leads to great difficulty in the completion of the below.]

- the parents have been tested for the heritable disease or defect, if they are still used for breeding and an acceptable test is available. If an acceptable test is not available, the parents must be assessed by a veterinary practitioner for the heritable disease or defect; and
- existing offspring of those parents still currently residing at the establishment have been tested for the heritable disease or defect, where an acceptable test is available.

If one or both of the parents have the heritable defect, genetic counselling must be obtained from a veterinary practitioner prior to continuing to breed with those greyhounds. [GOTBA VIC: Absolutely unacceptable, not to mention imprecise as to what 'genetic counselling' is.]

If any offspring have the heritable defect, a sale or euthanasia plan must be developed in conjunction with a veterinary practitioner and all details about the

heritable defect and likely outcomes for the greyhounds must be fully disclosed to their owners and any prospective purchasers. **[GOTBA VIC: Delete.]**

Any greyhounds in the establishment who carry recessive genes for any heritable defect that causes a disease or defect must not be bred together. **[GOTBA VIC: See above.]**

6.3.2 Breeding males

Male greyhounds must be at least 24 months of age prior to their first service.

A male greyhound must have a general health check by a veterinary practitioner prior to first service to assess whether the greyhound is suitable for breeding purposes. Veterinary practitioners must provide a certificate to state that, at the time of examination, the greyhound was suitable to breed.

Male greyhounds must have a general health check by a veterinary practitioner at least annually.

If evidence of a heritable defect that causes disease is found in puppies produced by a male greyhound, the male must not continue to breed unless continued breeding is approved by a veterinary practitioner. **[GOTBA VIC: Absolutely unacceptable, see above.]**

Note

A male must not be put with more than one female at any one time for natural mating purposes. **[GOTBA VIC: This is extremely unlikely to occur given the value of the greyhounds involved.]**

6.3.3 Breeding females

Female greyhounds must be at least 24 months of age prior to their first service. **[GOTBA VIC: The age restriction is not appropriate. We note that it is 12 months on other dog codes (although it is exceedingly unlikely that a greyhound bitch would be bred at or near 12 months of age).]**

[If a bitch passes a vet check for breeding purposes, this Code (as opposed to any GRV Rules) should not have a separate age restriction.)]

A female greyhound must have a general health check by a veterinary practitioner prior to first service to assess whether the greyhound is physically mature enough to be bred with. Veterinary practitioners must provide a certificate to state that, at the time of examination, the greyhound is suitable to breed. **[GOTBA VIC: This is covered in a female obtaining a 'pink card' to breed under GRV Rules.]**

A veterinary practitioner must provide a general health check:

- within 4 weeks prior to all subsequent seasons in which the owner intends to service the female and within 8 weeks of giving birth; or **[GOTBA VIC: Timing makes no sense.]**
- at least annually, _

whichever is more

frequent. _

A female greyhound must have no more than three litters in her lifetime. **[GOTBA VIC: Poor drafting (absolute prohibition, followed below by apparent qualification not linked to the prohibition). This is covered in a female obtaining a 'pink card' to breed under GRV Rules. If a bitch passes a vet check for breeding purposes, this Code (as opposed to any GRV Rules) should not prevent breeding.]** If a breeder wishes to continue breeding from a female greyhound, the breeder must obtain a recommendation from a veterinary practitioner that the greyhound is suitable to continue to breed beyond three litters and obtain formal approval from GRV. **[In any event, no more than two additional breeding approvals per female greyhound are permitted under this Code.]** **[GOTBA VIC: See above.]**

If evidence of a heritable defect is found in puppies produced by a female

greyhound, the female must not continue to breed unless continued breeding is approved by a veterinary practitioner. [GOTBA VIC: Absolutely not, see previous comments on 'heritable defects'.]

6.3.4 Natural Mating

Natural mating pairs must be physically separated from other greyhounds.

Natural mating pairs must be monitored during mating.

Dog breeding stands must not be used.

If the female greyhound is being unduly harassed by the male greyhound, she must be removed and the advice of a veterinary practitioner sought:

- if there is a risk of injury to either greyhound; or
- for any other concern.

A male and female greyhound may be housed in a suitably sized pen together for a period of time during mating. **[GOTBA VIC: This should not remain – or should be qualified as being under direct supervision. It is unlikely that breeders would, or should, allow housing of a male and female together for mating for anything other than a minimal amount of time. Most mating in the Victorian industry occurs via AI.]** After mating, both greyhounds must be physically separated (that is, placed back in their home pens or other accommodation), assessed for signs of injury, and treatment provided where necessary. Both greyhounds must be returned to their home pens every evening even if mating has not yet occurred.

6.3.5 Artificial Insemination

Artificial insemination must be conducted by an artificial insemination technician who is registered in accordance with GRV Rules or by a veterinary practitioner.

Surgical artificial insemination must be conducted by a veterinary practitioner under a general anaesthetic and include appropriate pain relief during and post-surgery. **[GOTBA VIC: Why does this Code seek to tell vets how to do their job (presumably also under pain of a conviction and a \$38,000 or greater fine)?]** A veterinary practitioner must provide written advice regarding greyhound after-care including exercise post-surgery and during pregnancy.

6.3.6 Whelping

By seven days of her due date **[GOTBA VIC: This is an example of a set date that may not work to the best interests of the pregnant bitch – timing should be a matter of animal management. Our members provided examples where a later move was appropriate for their pregnant females, given the stress that the female exhibited when moved prior to whelping. Mandating inappropriately raises the risk of adverse welfare outcomes.]**, a pregnant greyhound must be moved to a specific whelping housing area and/or provided with private accommodation containing a whelping box that complies with this Code.

Exercise, socialisation, enrichment and handling of a pregnant female greyhound during late pregnancy must remain the same as during earlier stages of pregnancy where their health and physical condition allow. **[GOTBA VIC: See general submissions.]**

As soon as the greyhound shows signs of whelping, fresh bedding material

must be provided and the female greyhound continually monitored until whelping is complete.

If there are any abnormalities observed or concerns for the welfare of the female greyhound or puppies during the whelping process, the advice of a veterinary practitioner must be immediately sought.

After whelping is complete, the female greyhound and her puppies must be monitored six hourly until the puppies are feeding and maternal acceptance has been firmly established.

The whelping area must be completely cleaned and all bedding material changed within 24 hours of the completion of whelping.

[Oxytocin must only be administered by a veterinary practitioner]. [GOTBA VIC: This is a positively dangerous requirement. Oxytocin often (usually) forms part of the whelping pack provided by vets to participants for their administration. Its prompt administration to the bitch if required during whelping can be A VITAL, LIFESAVING NECESSITY for either or both bitches or puppies.]

6.3.7 Caesarean section

Caesarean section must only be performed by a veterinary practitioner. [GOTBA VIC: This is insulting if, as it would seem, there is an underlying assumption that participants perform them.] Greyhounds undergoing caesarean section must have the procedure performed under general anaesthetic and include appropriate pain relief during and post- surgery.

Appropriate wound care, as directed by a veterinary practitioner, must be provided for greyhounds post-surgery. [GOTBA VIC: Why does this Code seek to tell vets how to do their job (presumably also under pain of a conviction and a \$38,000 or greater fine)?]

A veterinary practitioner must provide written advice regarding greyhound after care including exercise post-surgery. [GOTBA VIC: Why does this Code seek to tell vets how to do their job (presumably also under pain of a conviction and a \$38,000 or greater fine)?]

6.3.8 Lactating Greyhounds

Monitoring of lactating greyhounds must include observation of:

- all puppies feeding;
- the greyhound lactating; and
- if applicable, monitoring of caesarean wounds for redness, swelling and discharge.

If puppies do not gain weight, the proprietor must seek the advice of a veterinary practitioner and action taken as directed by the veterinary practitioner. [GOTBA VIC: Standard animal husbandry - this should not be a directive to go to the vet.]

For the first week post-whelp, greyhounds must be examined twice daily for mastitis and veterinary attention provided immediately upon diagnosis.

Soiled bedding material must be removed and clean bedding material must be

provided on a daily basis during lactation.

Lactating greyhounds must:

- be exercised as per Table 1 under Section 6.4 of this Code; and **[GOTBA VIC: See submissions generally. Note that certain of the exercise requirements are considered dangerous to the puppies of the lactating bitch.]**
- have a post-partum health check within eight weeks of whelping.

Puppies must have a health check by a staff member within 12 hours of whelping. Daily handling of puppies must begin within seven days of whelping.

6.3.9 Rearing

[GOTBA VIC: See submissions generally, particular in relation to cost implications and the adverse welfare outcomes associated with certain of these requirements.]

[Note that the exercise requirements of the existing Code of Practice for the Operation of Greyhound Establishments are set out in 2 paragraphs (section 3.5 of that document).]

During rearing, greyhounds must:

- not be permanently separated from their mother before 8 weeks of age, the only exception being when a veterinary practitioner determines that the health of the puppies would be significantly compromised if kept with their mother;
- be registered with GRV before seven days of age and microchipped before three months of age except where microchipping is deemed by a veterinary practitioner to be prejudicial to the health of the greyhound; **[GOTBA VIC: See previous comments on time of registration.]**
- be housed in accordance with Table 3 of this Code; **[GOTBA VIC: There is no appropriate reason to mandate such requirements in the fashion that the Code does, particularly given the regular inspection of the welfare of the greyhound and the particular purpose for which greyhounds are bred, reared and trained. Some of the housing requirements also endanger the health of the greyhound – see Table 3.]**
- be handled, exercised, socialised and trained in accordance with Table 1 and 2 under Sections 6.4 and 6.5 of this Code; **[GOTBA VIC: There is no appropriate reason to mandate such requirements in the fashion that the Code does. In many cases, the requirements – taken from other codes – are manifestly inappropriate to the lifecycle stage of the greyhound and neither assist the general welfare nor the re-homing potential of the greyhound.]**
- be exposed to different environments and/or changes to their environment (for example, changes in toys and obstacle items in pens, starting boxes, walking in new environments and introduction to new people) on a weekly basis; **[GOTBA VIC: There is little evidence that these things – or mandating these things at the levels stated – for greyhounds, has any relevant effect.]**
- be provided with exercise options that encourage chasing behaviour such as chasing games;

- be handled at least 30 minutes per day, during the course of normal management;
- be actively monitored when housed together and if fighting, bullying or other adverse welfare outcomes are identified, they must be separated; and_
- not be muzzled at any time, except as part of the education process or when in public or under the direction of a veterinary practitioner during treatment for an injury or illness.

From **eight to sixteen weeks of age**, greyhounds must:

- be provided with access to at least 3 different surfaces in their pen or kennel environment (for example, bed and bedding material, concrete, grass, carpet etc.); and **[GOTBA VIC: Why?]**
- be taught to wear a collar, walk on a lead and walk by their collar. **[GOTBA VIC: This should be a later date, it being acknowledged that, as a matter of best practice, such education should ideally occur during this timeframe.]**

From **sixteen weeks of age**, greyhounds must:

- be given at least five hours access per day to an exercise area of at least 20 sqm per greyhound; **[GOTBA VIC: Why mandate this particular figure? It is in the best interests of the participant to ensure that a juvenile greyhound has sufficient access to exercise but that is an entirely insufficient reason to impose such a requirement under pain of conviction and a fine.]**
- be walked on a lead at least 4 times per week; **[GOTBA VIC: This is not appropriate or reasonably cost effective.]**
- be walked by their collar twice weekly; **[GOTBA VIC: This is not appropriate or reasonably cost effective.]**
- have 2 opportunities per week for ten to fifteen minutes of time isolated from their littermates (in the company of a handler) or complete isolation to acclimatise them to periods of separation from their littermates; **[GOTBA VIC: This should be left entirely to the discretion of the rearer – such isolation may be thoroughly inappropriate for the greyhound concerned and can lead to fighting/adverse activity on re-introduction.]**
- be given exposure to standard racing housing pens of 3 sqm and race-day cages regularly; and
- be bathed in warm water and towel dried once per month where weather allows. **[GOTBA VIC: Why on earth would this be mandated, as opposed to simply having the requirement set out at 6.2.4 (Grooming and other requirements)?]**

Puppies under sixteen weeks of age may be housed as a litter where pen sizes meet the minimum space allowance in accordance with Table 3 of this Code.

No more than four compatible greyhounds sixteen weeks to nine months of age can be housed together. **[GOTBA VIC: This should be left to the discretion of the rearer and the monitoring of welfare as part of usual animal management. Pack raising of greyhounds is a known technique that certain successful rearers do use (bearing in mind that the racing greyhound races with 7 others).]**

No more than two compatible greyhounds nine months or older can be housed together. **[GOTBA VIC: See above.]**

Female greyhounds nine months or older who are showing signs of coming into or are in season must not be housed with male greyhounds nine months or older.

During rearing, it is recommended that greyhounds older than sixteen weeks of age receive exposure to the following as often as possible: **[GOTBA VIC:**

These are matters of ordinary animal management, noting that they are only recommendations.

- starting boxes;
- travelling in cars and trailers;
- circular training facilities; and
- race track environments.

From three months before a greyhound moves to pre-education, greyhounds must be provided with a 'Housing Acclimatisation' program. [GOTBA VIC: These are matters of ordinary animal management and should not be mandated.] The program must:

- provide increased exposure to housing equivalent in size and design to common racing kennels of between 3 sqm and 9 sqm; [GOTBA VIC: These are matters of ordinary animal management – we note that there is no requirement to actually have kennels this size.]
- include daily exposure to a racing kennel, for periods of time which increase gradually from zero to six hours per day by the end of the three month period; and
- ~~be incorporated into the health management plan for the establishment.~~

During the Housing Acclimatisation program each greyhound must be: [GOTBA VIC: These are matters of ordinary animal management and should not be mandated.]

- provided with positive reinforcement and enrichment such as toys, bones or other activities; and
- provided with toilet breaks every two to three hours to help build familiarity with race kennel routine.

Note

Education and training should be conducted in such a way to promote a positive experience for the greyhound. [GOTBA VIC: Motherhood statements are not appropriate subject matter for a Code with conviction and fines as proposed consequences.]

6.3.10 Education and pre-training

Education is the period of management during which a greyhound transitions to training within the industry. This period is sometimes referred to as 'breaking- in'. Pre-training is the period of training before the greyhound progresses to full time training.

[GOTBA VIC: It should not be assumed that education occurs over a defined period – elements of 'breaking' may occur over many months, particularly if a participant does not send a greyhound away for breaking in.]

During education and pre-training, greyhounds must:

- be handled, exercised, socialised and trained in accordance with Tables 1 and 2 of this Code; [GOTBA VIC: There is no appropriate reason to mandate such requirements in the fashion that the Code does. In many cases, the requirements – taken from other codes – are manifestly inappropriate to the lifecycle stage of the greyhound and neither assist the general welfare nor the re-homing potential of the greyhound.]
- be housed in accordance with Table 3 of this Code; [GOTBA VIC: There is no appropriate reason to mandate such requirements in the fashion that the Code does. In many cases, the requirements – taken from other codes – are manifestly inappropriate to the lifecycle stage of the greyhound and neither assist the general welfare nor the re-homing potential of the greyhound.]

- be exercised, toileted, handled, socialised and enriched according to the kennel size in which they are kept (see Table 3 of this Code); **[GOTBA VIC: There is no appropriate reason to mandate such requirements in the fashion that the Code does. In many cases, the requirements – taken from other codes – are manifestly inappropriate to the lifecycle stage of the greyhound and neither assist the general welfare nor the rehoming potential of the greyhound.]**
- receive a minimum of twice weekly exposure to 30 to 60 minutes of isolation from other greyhounds and humans. This can be part of race crate training or other training activities; **[GOTBA VIC: This should simply not be mandated. We note that even in race kennels, a greyhound is not isolated per se from other greyhounds (at the very least it can hear, and can usually see, other greyhounds).]**
- be provided with exposure to race track environments at least twice prior to moving into training; **[GOTBA VIC: This should simply not be mandated.]**

- be monitored at least five times per day for signs of stress, poor acclimatisation, and the development of behavioural stereotypes. **[GOTBA VIC: This should simply not be mandated, but left to ordinary animal management.]** Appendix 2 of this Code provides a list of common signs of stress and behavioural stereotypes in greyhounds and possible intervention options; and
- not be muzzled in their housing environment except under the direction of a veterinary practitioner. **[GOTBA VIC: See previous comments at Section 6.2.5 Muzzling.]**

Observations must be recorded daily and used as a management tool for assessing the acclimatisation of the greyhound to its new housing and its readiness for training and racing. **[GOTBA VIC: Far too over-burdensome.]**

Management of stress in Greyhounds

[GOTBA VIC: These are matters of ordinary animal management. Much of the below is in any event either repetitive or contradictory to previous parts of the Code.]

If signs of stress, poor acclimatisation or development of behavioural stereotypes are recorded for more than two consecutive days, the possible source of stress must be identified and action taken to alleviate the stress and reduce the risk of the development of long term behavioural stereotypes. Appendix 2 of this Code provides a list of common signs of stress and behavioural stereotypes and possible intervention options.

If signs of stress identified are related to small race kennel housing (3-9 sqm), the greyhound must be:

- moved to a pen of a minimum of 20 sqm; and
- continually monitored.

If the greyhound shows signs of reduced stress, the greyhound may begin a program of gradual introduction to small pen sizes commencing at a size of 15 sqm, moving to 10 sqm, then 6 sqm and so on. If the greyhound does not show obvious signs of improvement over a period of 2-3 days, a veterinary practitioner must be consulted.

The establishment's health management plan must include intervention points and management plans for greyhounds showing signs of poor acclimatisation, stress and/or the development of behavioural stereotypes. **[GOTBA VIC: Unnecessarily overburdensome.]**

Greyhounds during education and pre-training may be housed in kennels, in accordance with Table 3 of this Code.

Greyhounds in education and pre-training may be housed individually or in pairs in appropriately sized pens.

Female greyhounds showing signs of coming into or in season must not be housed, toileted or exercised with male greyhounds nine months or older.

During education and pre-training, greyhounds must receive a minimum of once weekly exposure to: **[GOTBA VIC: This absolutely should not be mandated and is entirely up to the participant (again, there is a natural incentive to acclimatize and train the greyhound on the below but it is absolutely inappropriate to mandate weekly exposure to each under pain of conviction and fine).]**

[There may be perfectly reasonable reasons why a responsible participant may not wish to expose greyhounds to one or more of the below in any given week – eg circular training facilities may pose a greater risk of re-injury for a greyhound returning to pre-training after a post break-in spell and a trainer may wish to follow a different education and fitness program adapted to the welfare of the greyhound to maximise performance.]

- starting boxes;
- travelling in cars and trailers;
- circular training facilities;
- straight tracks; and
- lures.

6.3.11 Training and Racing

[GOTBA VIC: See submissions and previous comments in relation to rearing. The housing, exercise, toileting and socializing and enrichment provisions, in particular, are very poorly adapted to the practical or welfare appropriate needs of a greyhound in race training and performance.]

During training and racing, greyhounds must:

- not be housed in kennels of less than 3 sqm in size, in accordance with Table 3 of this Code; **[GOTBA VIC: See Table 3.]**
- be handled, exercised, socialised and trained in accordance with Tables 1 and 2 and housed in accordance with Table 3 of this Code;
- not be muzzled in their housing environment except under the direction of a veterinary practitioner;
- be exercised, toileted, handled, socialised and enriched according to the kennel size in which they are kept (see Table 3 of this Code); and
- be monitored at least five times per day for signs of stress and the development of behavioural stereotypies (see Appendix 2 of this Code).

The establishment's health management plan must include intervention points and management plans for greyhounds showing signs of stress and/or the development of behavioural stereotypies. **[GOTBA VIC: Unnecessarily overburdensome.]**

Where greyhounds are being housed in kennels which are the minimum size allowable under this Code and are showing signs of ongoing stress or the development of behavioural stereotypies, they must be assessed by a veterinary practitioner in accordance with the establishment's health management

plan. This may include returning the greyhound to pre-training or moving the greyhound to a larger kennel. **GOTBA VIC: Unnecessarily overburdensome – this ought be a matter of ordinary animal management.** Muzzling or other physical restriction of these behaviours is not considered an acceptable long term management tool.

6.3.12 Preparing a greyhound for retirement or rehoming

[GOTBA VIC: See submissions. These should not be mandated requirements – as opposed to recommended practice - noting that GRV Rules separately require that every effort, with evidence, is made to find a suitable long term home for a greyhound to avoid euthanasia (LR 42.6). Spelling and other pre-preparation for re-homing – successfully – takes a number of different forms by participants, from at racing kennels (not preferred) to entirely different properties unconnected with racing.]

Mandating specific requirements will take establishments out of the pool of possible preparatory establishments, to the detriment of broader re-homing prospects. It will also drive-up the cost of re-homing activities, far more than that proposed in the Regulatory Impact Statement.]

Preparation Weeks 1 to 4

Once a greyhound has been deemed unsuitable for racing or breeding, whether this is during education (breaking-in) or at a later stage in the greyhound's racing career, the greyhound must be spelled for at least four weeks unless otherwise approved by GRV. During this four week period:

- diet must be adjusted, in accordance with the health management plan, to increase weight;
- exercise regime must be slowly decreased; and
- the greyhound must be transitioned to housing of at least 15 sqm in area.

If a greyhound is deemed unsuitable for racing or breeding prior to education and pre-training, they are not required to complete the spelling period.

Minimum socialisation, handling, and enrichment requirements must be met during this time (see Tables 1 and 2 at Sections 6.4 and 6.5 of this Code).

[GOTBA VIC: See previous comments.]

Preparation Weeks 5 and 6

Once the four week spelling has concluded, greyhounds must be moved to an outdoor pen or to within a home. Preferably, greyhounds should be housed in a family environment and kept in the backyard; however this may not be possible due to inadequate fencing and or the presence of small dogs and children.

During preparation weeks 5 and 6, greyhounds must be:

- walked for 20 minutes per day in public, muzzled and on a lead at all times; [GOTBA VIC: Why is this mandated? It is noted that this is significantly more difficult matter to achieve at from a regional establishment.]
- provided with exposure to different flooring surfaces and people in a non-training or racing setting daily; and [GOTBA VIC: This should not be mandated but should be a best practice guideline.]
- provided with daily periods of isolation from other greyhounds and humans, starting with 30 minutes and gradually increasing to three to four hours in duration. [GOTBA VIC: Why is this mandated in this

way?]

During Week 6, greyhounds may be given exposure to larger dogs (not greyhounds) on a lead in a public setting. [GOTBA VIC: It is noted that this is significantly more difficult matter to achieve at from a regional establishment. Query whether this is something, for example, that any re-homing facility (greyhound or non-greyhound (ie a shelter)) would comply with.]

Preparation Week 7 and onwards

Greyhounds must be walked for 20 minutes per day in public, muzzled and on a lead. [GOTBA VIC: Why is this mandated? It is noted that this is significantly more difficult matter to achieve at from a regional establishment. This imposes a requirement that is simply not put upon any other animal owner in society, again, here under pain of conviction and a \$38,000 or up to \$93,000 penalty.] Opportunities for socialisation of the greyhound with other breeds is encouraged.

Behaviour of greyhounds being introduced to new environments, people, and animals must **[GOTBA VIC: Why is this mandated?]** be monitored and the interaction immediately ceased if the greyhound shows signs of fear, predatory or aggressive behaviour including barking, lunging, growling, snapping, stalking, shaking, cowering and freezing.

Professional veterinary support or support from GRV must **[GOTBA VIC: Why is this mandated?]** be sought if the greyhound continues to show excessive fear behaviours, aggressive, or predatory behaviours towards small dogs and/or other animals. _

Rehoming without preparation

Where a new home has been found for a greyhound, but the greyhound has not completed the minimum seven week preparation period, the greyhound may be rehomed if accompanied by a greyhound rehoming statement outlining the housing, feeding and exercise regime of the greyhound for the previous three months. A statement from the trainer **[GOTBA VIC: It should not be assumed that the relevant person is the trainer by this stage.]** -about the health and behaviour of the greyhound at the time of adoption is also required.

The new owner must also sign a greyhound adoption declaration that states they understand that preparation for rehoming has not been completed, the greyhound may require a period of retraining, and that the greyhound must be muzzled and on a lead at all times when in public. **[GOTBA VIC: How is control exercised over the new owner under this Code?]**

Both the new owner and previous carer must sign the rehoming statement and a copy of the statement and the greyhound adoption declaration must be provided to GRV within four days. **[GOTBA VIC: By whom?]**

6.3.13 Retirement and rehoming of greyhounds

When a greyhound is no longer considered suitable for racing or breeding and is suitable for rehoming, every effort must be made to rehome that greyhound to an appropriate home. Retirement and rehoming may occur at any stage during the greyhound's life – from puppy to adult greyhound.

All retired greyhounds must be:

- rehomed to a suitable home — where health and temperament of the greyhound have been assessed as suitable for rehoming; or
- surrendered to a registered pound or shelter or a rescue group or community foster care network; or
- kept as a pet; or
- when dictated by health or behaviour problems or when an acceptable home is unable to be found, euthanased by a veterinary practitioner [in accordance with the acceptable procedures set out in Section 4.2, that is by injection of barbiturate overdose]. **[GOTBA VIC: Surplusage – these code should not tell vets how to do their jobs.]**

Greyhounds being rehomed to a member of the public or a rescue organisation/ community foster care network, must be desexed prior to moving to their new home. GRV must be notified of the name, address, local government area, phone number and any other relevant contact details of the new owner (including pound or shelter) in the format approved by GRV [GOTBA VIC: This is a matter for GRV Rules but also raises issues of privacy etc for the new owner]. GRV is required to notify the appropriate local council that a greyhound has been retired into the community [GOTBA VIC: That should be a matter entirely for the new owner, not GRV]. The new owner must be provided with information about their legal obligations under the *Domestic Animals Act 1994* (Vic).

GRV must be notified of an intention to euthanase a greyhound at least 14 days prior to carrying out the euthanasia, where it is not being undertaken on medical grounds (Notice of Intent to Euthanase).

6.4 Exercise, training and enrichment

[GOTBA VIC: See submissions. These are not matters for mandating of specific requirements under this Code.]

Note that section 3.5 of the existing *Code of Practice for the Operation of Greyhound Establishments* states the exercise requirements in 2 short paragraphs.

There is a natural incentive for participants to raise a fit, well-adjusted greyhound, used to noise, isolation and public places, for the purposes of the maximizing the opportunity of a racing career, which flows into a greyhound also being adjusted, or adjustable with minor routine changes, for re-homing purposes.

Greyhound health is regularly inspected by regulators or third parties. Health on inspection is the determining factor for the appropriateness of husbandry practice from a general welfare perspective.

Mandating imposes enormous potential costs for little discernible welfare or re-homing benefit. The mandating – particularly, but not exclusively, for lactating bitches and race dogs – more importantly also raises significant risk of adverse welfare outcomes and/or adverse racing outcomes.

This section – taken in large part from the *Code of Practice for the Operation of Breeding and Rearing Businesses 2014* (July 2015 version) and simply dropped in this code - should not be included in anything like this form.

All greyhounds must be provided with a minimum amount of daily exercise and enrichment.

When being used by greyhounds, treadmills must be supervised at all times by a staff member.

Greyhounds must not be exercised in any way attached to a motorised vehicle.

Exercise within the housing area may only occur where the housing area has an

additional 20 sqm of area per greyhound. For litters under 16 weeks of age, an additional in-pen exercise area must be a minimum size of 20 sqm.

Table 1. Exercise and enrichment for greyhounds

Category	Exercise and training requirements	Environmental enrichment requirements
Puppies 0–4 weeks	Normal movement within the whelping box and mother’s pen area.	<p>Must be provided with a variety of different surfaces within the enclosure that expose the puppies to different textures (for example, hard floors, soft bedding, newspaper, artificial grass, turf, etc.).</p> <p>[GOTBA VIC: This should not be mandated.]</p>
Puppies 4–8 weeks	<p>Normal movement and play within the mother’s pen area.</p> <p>Can include playing with toys and interaction with humans.</p> <p>[GOTBA VIC: This implies that toys for puppies be included in the mother’s play area. That is not a wise idea and greatly increases the risk of the mother injuring or inadvertently killing the puppies.]</p>	<p>Must be provided with at least three different surfaces within the enclosure that expose the puppies to different textures (for example, hard floors, soft bedding, newspaper, artificial grass, turf etc.).</p> <p>Must provide a variety of toys within the enclosure to develop motor skills and play behaviour.</p> <p>Must rotate the toys on a weekly basis.</p> <p>[GOTBA VIC: This should not be mandated.]</p>
Puppies 8–16 weeks	<p>Must provide a minimum 20 minutes run or play time daily within a secure area outside of the primary greyhound housing area.</p> <p>Exercise and training includes being taught to:</p> <ul style="list-style-type: none"> • wear a collar; • walk on a lead; • walk by their collar; and • play chasing games. <p>[GOTBA VIC: This should not be mandated (as opposed to recommended practice).]</p>	<p>Must be provided with at least three different surfaces within the enclosure that expose the puppies to different textures (for example, hard floors, soft bedding, newspaper, artificial grass, turf, crate training etc.).</p> <p>Must provide a variety of toys within the enclosure to develop motor skills and play behaviour. [GOTBA VIC: This should not be mandated.]</p> <p>Must rotate the toys on a weekly basis. [GOTBA VIC: This should not be mandated.]</p> <p>Must be exposed to different environments and/or changes to their environment (for example, changes in toys and obstacle items in pens, starting boxes, walking in new environments, introduction to new people or environments) on a weekly basis. [GOTBA VIC: This should not be mandated.]</p>

Category	Exercise and training requirements	Environmental enrichment requirements
<p>Rearing (16 weeks +)</p> <p>[GOTBA VIC: See also previous comments in rearing section on these matters.]</p>	<p>Must have access to a minimum of five hours of exercise in an area of a minimum size of 20 sqm per greyhound.</p> <p>Must have daily exposure to 15 minutes of training per day. [GOTBA VIC: This should not be mandated.]</p> <p>Training includes:</p> <ul style="list-style-type: none"> • walked on a lead at least four times per week; • walked by their collar twice weekly; • run or free play in an exercise pen or area outside of normal housing; and • playing chasing games with balls or other suitable objects. 	<p>Must provide toys (for example, rope toys, squeaky toys, rubber toys etc.) and rotate toys weekly.</p> <p>Must have two opportunities per week for 10-15 minutes of time isolated from their littermates (in the company of a human) to acclimatise them to periods of separation from their littermates.</p> <p>Must be given exposure to standard racing housing pens and race-day cages regularly.</p> <p>Must be bathed in warm water and well dried once per month where weather allows. [GOTBA VIC: This should not be mandated. See above 6.2.4]</p> <p>May also provide food dispensing toys that encourage foraging. Examples include: rot balls, stuffed kongs, frozen food, bones.</p>
<p>Pre-training, training and racing</p> <p>[GOTBA VIC: See also previous comments in education, pre-training and training sections on these matters.]</p>	<p>Must have a minimum of 15 minutes exercise twice daily in the form of training, free play exercise, walking on a lead or racing.</p> <p>[GOTBA VIC: This should not be mandated and impedes ordinary animal management. See below.]</p> <p>Free play exercise must occur off lead and in an area of a minimum of 20 sqm per greyhound.</p> <p>Note: race-day and post-race day exercise is not required if the greyhound requires resting. [GOTBA VIC: Training usually extends to carefully considering and adjusting exercise in the extended lead-up to racing for events]</p>	<p>Must provide chew toys (for example, rope toys, squeaky toys, rubber toys, kong, bones etc.) rotated weekly. [GOTBA VIC: This should not be mandated. See also immediately below.]</p> <p>Must receive a minimum of once weekly exposure to starting boxes, travelling in cars and trailers, circular training facilities, straight tracks, and lures or race-day cages. [GOTBA VIC: It is absolutely inappropriate to mandate this in any way – see comments at 6.3.10 re education and pre-training - but it is especially and even more so inappropriate in the training phase. Is the intent REALLY to tell participants how to train their greyhounds in this way?]</p> <p>Must be toileted in accordance with Table 3 under Section 6.6.7 of this Code. [GOTBA VIC: See comments in toileting section and re toileting yard sizes.]</p>

worth up to **half a million dollars**. Mandating an exercise regime or a training regime such as this is absolutely inappropriate and may very foreseeably result in injury or adverse racing performance.]

Category	Exercise and training requirements	Environmental enrichment requirements
Pregnant females	<p>Must be walked on a lead or exercised for a minimum of 30 minutes or two 15 minute sessions daily or must have access to 20 sqm of exercise space for a minimum of four hours a day.</p> <p>[GOTBA VIC: This should not be mandated and, as a matter of experience, many pregnant greyhounds, particularly late term, have minimal to zero interest in any more than fleeting 'exercise'.]</p> <p>Exercise may include on-lead exercise or off-leash in a secure fenced area being directly monitored and supervised.</p> <p>Exercise modifications must be under the direction of a veterinary practitioner.</p>	<p>Must provide chew toys (for example, rope toys, squeaky toys, rubber toys, kong, bones etc.) rotated weekly. [GOTBA VIC: This should not be mandated.]</p> <p>Must be toileted in accordance with Table 3 under Section 6.6.7 of this Code. [GOTBA VIC: This should not be mandated.]</p>
Lactating females	<p>Must be walked on a lead for a minimum of 20 minutes from seven days post-whelping.</p> <p>[GOTBA VIC: This should not be mandated and, as a matter of experience, many lactating greyhounds, have minimal to zero interest in any more than fleeting 'exercise'.]</p> <p>Exercise may include on-lead exercise or off-leash in a secure fenced area being directly monitored or supervised.</p> <p>Exercise modifications must be under the direction of a veterinary practitioner.</p>	<p>Must provide chew toys (for example, rope toys, squeaky toys, rubber toys, kong, bones etc.) rotated weekly. [GOTBA VIC: This is positively dangerous if near the puppies, and in many cases even if not. It is not in the interests of the puppies for the lactating bitch to become excited in any way around them (including by being put in an excited state prior to being placed with the puppies).]</p> <p>Must be toileted in accordance with Table 3 under Section 6.6.7 of this Code. [GOTBA VIC: This should not be mandated.]</p>

Spelling

Must provide gentle exercise for a minimum 15 minutes twice daily in an area containing natural daylight. [GOTBA VIC: This should not be mandated.]

Must provide chew toys (for example, rope toys, squeaky toys, rubber toys, kong, bones etc.) rotated weekly.

Must be toileted in accordance with Table 3 under Section 6.6.7 of this Code. [GOTBA VIC: This should not be mandated.]

Category	Exercise and training requirements	Environmental enrichment requirements
Retirement [GOTBA VIC: See previous comments in retirement and re-homing section.]	Must provide gentle exercise for a minimum 15 minutes twice daily in an area containing natural daylight. Must be walked on a lead for a minimum of 20 minutes daily. [GOTBA VIC: This should not be mandated.]	Must provide chew toys (for example, rope toys, squeaky toys, rubber toys, kong, bones etc.) rotated weekly. Must be toileted in accordance with Table 3 under Section 6.6.7 of this Code.
Dogs and puppies who are injured, ill, or recovering from ailment or surgery	Under guidance of veterinary practitioner.	Under guidance of veterinary practitioner.

6.5 Socialisation and handling

[GOTBA VIC: See submissions. These are not matters for mandating of specific requirements under this Code (as opposed to best practice guidelines).]

There is a natural incentive for participants to raise a fit, well-adjusted greyhound, used to noise, isolation and public places, for the purposes of the maximizing the opportunity of a racing career, which flows into a greyhound also being adjusted, or adjustable with minor routine changes, for re-homing purposes.

Greyhound health is regularly inspected by regulators or third parties. Health on inspection is the determining factor for the appropriateness of husbandry practice from a general welfare perspective.

Mandating imposes enormous potential costs for little discernible welfare or re-homing benefit.

This section – taken in large part from the Code of Practice for the Operation of Breeding and Rearing Businesses 2014 (July 2015 version) and simply dropped in this code should not be included in anything like this form.]

The health management plan for the establishment must detail socialisation and handling programs for all greyhounds at all stages in the establishment. Table 2 below provides minimum requirements for those socialisation and handling programs.

Socialisation can be accomplished during exercise, training and handling periods.

Minimum handling time periods are considered cumulative during the day and include normal handling as a result of cleaning, feeding, exercise and training regimes.

Table 2. Socialisation and handling for greyhounds

Category	Socialisation	Handling
Puppies 0–4 weeks	<p>Must include exposure to humans through daily handling.</p> <p>Must remain with mother and other littermates unless under advice of a veterinary practitioner.</p>	<p>Must include five minutes of human handling per puppy daily from seven days of age.</p>
Orphaned puppies 0–4 weeks	<p>Must include exposure to humans through daily handling.</p> <p>Must remain with other littermates where possible, unless under advice of a veterinary practitioner.</p>	<p>Handling of orphaned puppies outside of normal feeding and cleaning must be conducted under the direction of a veterinary practitioner.</p>
Puppies 4–8 weeks	<p>Must include exposure to humans through daily handling and interactive play using toys.</p> <p>Must not be permanently removed from mother and other littermates until eight weeks of age unless under advice of a veterinary practitioner.</p> <p>Where female greyhounds are exhibiting signs of intolerance towards their puppies, prior to eight weeks of age, the litter and mother must be moved to pen at least 20 sqm greater in area. [GOTBA VIC: Mandating this is most unwise. The mother, having sufficient space to move around quickly and become excited, but still within an enclosed area, is at a far greater risk of (inadvertently) badly injuring or killing one or more of her puppies. Again, a decision to do this – or instead take other measures - must be left to ordinary animal management.]</p>	<p>Must consist of a minimum of 30 minutes human handling per litter daily including handling of all members of the litter.</p>

Category	Socialisation	Handling
Puppies 8–16 weeks	<p>Must include exposure to humans through daily handling and interactive play using toys.</p> <p>May include exposure to a variety of other vaccinated dogs that are socially compatible where practical and microchipped.</p>	<p>Must consist of a minimum of 30 minutes human handling per puppy daily. [GOTBA VIC: This should not be mandated and should in any event be by litter at this stage.]</p>
Greyhounds (16 weeks +)	<p>Must include exposure to humans through daily handling and positive interactions (such as play time, training, exercise) outside of daily cleaning and feeding routine.</p> <p>Must include play, exercise, training, toileting time with a variety of other vaccinated greyhounds that are socially compatible. [GOTBA VIC: This should not be mandated.]</p>	<p>Must consist of a minimum of 30 minutes human handling per greyhound daily. [GOTBA VIC: This should not be mandated.]</p>
Greyhounds and puppies who are injured, ill, or recovering from ailment or surgery	<p>Under guidance of a veterinary practitioner.</p>	<p>Under guidance of veterinary practitioner.</p>

6.6 Facilities

[GOTBA VIC: See submissions.]

Note that sections 3.7 and 3.8 of the existing *Code of Practice for the Operation of Greyhound Establishments* states the requirements for housing and enclosures over a few pages. We recognize that in certain cases that code attempts to prescribe things such as wire mesh hole sizes (see section 3.7.5 fencing of that code). We nonetheless disagree, for reasons that follow.

The overriding principle for suitability of facilities is whether greyhounds in them, on inspection, are healthy on ordinary principles. Nothing else matters.

Particularly from 6.6.4 onwards, this section is an unnecessary and likely cost

prohibitive part of the Code, all the more so without grandfathering of existing facilities where no welfare issues have been identified when greyhounds on or greyhounds from that property have been identified to date.

Participants should not be told what size fences to have, what they should be made out of etc.]

This section outlines the minimum housing requirements for keeping greyhounds.

Emergency evacuation procedures must be displayed in multiple locations in and near greyhound housing areas. For hobby establishments, this may be near the front door of a place of residence or near the kennel areas.

Facilities must have appropriate fire extinguishers or other fire protection.

6.6.1 Disinfection and hygiene

[GOTBA VIC: The level of needless minutiae in this section is extraordinary. Note that section 3.4 of the existing *Code of Practice for the Operation of Greyhound Establishments* states the requirements for hygiene in 6 short paragraphs.]

Maintenance of hygiene in a greyhound establishment will prevent build-up of disease-causing organisms including bacteria, viruses and parasitic worm eggs.

The greyhound establishment must be clean and hygienic at all times.

[All pens and kennels used to house greyhounds must be cleaned out at least once per day (or more often as required) by hosing or other appropriate means.]
[GOTBA VIC: Why mandate, after the previous paragraph?]

All faeces, used bedding material and uneaten food must be removed prior to cleaning.

Uneaten food must be placed in a waste disposal device.

Where hosing is the preferred method of cleaning, greyhounds must be removed from the housing prior to hosing and then returned to the housing once cleaning is complete.

Disinfection of pens, using hospital or veterinary grade disinfectants, must be carried out once every seven days and: [GOTBA VIC: Why mandate – the greater majority of greyhounds are clean and do not soil their kennels or bedding?]

- prior to the introduction of a new greyhound
- prior to whelping; and
- upon the removal of puppies.

[Manufacturer's instructions for the use of these agents must be followed.]
[GOTBA VIC: Is this appropriate subject matter in a Code whose breach may result in significant fines and conviction?]

All equipment, gear and appliances must be cleaned and disinfected weekly, including hydrobaths and leads. [GOTBA VIC: This is not appropriate. Cleaning and disinfecting leads?]

All coats, blankets and bedding material must be washed weekly or when a greyhound is moved to a new pen, whichever is more frequent.
[GOTBA VIC: Why mandate? This should simply be a matter of ordinary animal and facility management. These things should be washed when they need to be.]

All watering, feeding receptacles and utensils must be rinsed daily and washed in hot soapy water or in a dishwasher at least once per week to ensure bowls are clean and free of food, mould, etc. Watering and feeding utensils must be disinfected if the greyhound using them is diagnosed with a disease or internal parasite infection before being used to feed or water another greyhound.

Enrichment toys must be washed in hot soapy water at least once per week or more often if soiled and disinfected when moved between litters. [GOTBA VIC: So a participant may be guilty of an offence if toys are not cleaned?]

Dishwashers are suitable for disinfection of water and feeding utensils, toys and washable enrichment items at a temperature of 65°C or above using the appropriate dishwashing detergent in accordance with the manufacturer's instructions. [GOTBA VIC: Is this appropriate subject matter in a Code?]

Utensils must be rinsed after disinfection to avoid poisoning.

The bedding areas must be completely dry prior to returning greyhounds.

Disposable bedding material, food containers, and general waste from the establishment must be placed in a waste disposal device.

Waste disposal must be in accordance with the requirements of the appropriate statutory authority.

Use of a trade waste service for collection and disposal of wastes is preferable.

Wastes must not be incinerated unless the incinerator is registered with the appropriate authority.

Establishments must have an adequate water supply and must be sewered, on a septic system, or have some other adequate method of disposing of faeces approved by the appropriate authority.

Open pits for collecting run off from drains must not be used.

Pests including fleas, ticks, flies, mosquitoes and rodents must be effectively controlled at the establishment. **[GOTBA VIC: What does this mean (again, bearing in mind the consequences of failure to comply with the Code – fine and/or conviction)? Why is this requirement focused on the pests and not their effect on the greyhound?]**

Protocols to effectively manage these pests must be included in the establishment's health management plan. **[GOTBA VIC: Repetitive and unnecessary.]**

Chemicals used for pest control must be commercially available and registered by the Australian Pesticides and Veterinary Medicines Authority and must be used in accordance with the manufacturer's instructions. Pest traps used must be in accordance with the *Prevention of Cruelty to Animals Act 1986* (Vic) and Regulations.

Material Safety Data Sheets for all chemicals used at the establishment, as noted in the establishment's health management plan, must be kept on site and made available to an authorised officer on request. **[GOTBA VIC: Burdensome – why is such a requirement necessary, particularly if, on inspection, (1) there is no issue with condition of greyhounds (2) there is no evidence of any infectious disease or other pest issue at the establishment?]**

6.6.2 Isolation housing

[GOTBA VIC: This is not practical – neither many vets nor participants will usually have this. Even if vets did have isolation housing, access to them – particularly in regional areas, may be an issue.]

[Again, is there any evidence at all to suggest the necessity for such a requirement in the greyhound industry?]

All establishments must provide an area for isolation of greyhounds suspected of having an infectious disease or must have a written agreement with a

veterinary practitioner to provide isolation housing off site at a veterinary practice. _

Isolation housing within the establishment must be physically separated by an impervious barrier or a distance of at least ten metres from other greyhound housing areas at the establishment.

Pen items, such as bedding materials, food and water utensils, enrichment items etc. from isolation areas must remain solely for use in isolation areas and not be used in other areas of the establishment.

Drainage must not run from isolation areas to or through other greyhound housing areas.

Greyhounds in isolation must be:

- maintained in an area approved in the greyhound health management plan with particular reference to the area's airflow, workflow and pen design; and
- under the supervision of a veterinary practitioner and their [fate] regularly reviewed in consultation with a veterinary practitioner.

6.6.3 Tethering

Greyhounds may only be tethered for temporary, short-term restraint under supervision. Greyhounds must not be permanently tethered or tethered as a form of long-term containment or housing at any time.

6.6.4 Perimeter property fencing

[GOTBA VIC: See submissions. This is absolutely unnecessary.]

It is likely to be prohibitively expensive (estimates we have been advised on range between \$40-\$64 per metre), particularly on larger properties (usually regional areas). It is understood that this does not necessarily require fencing of the required type around the outer perimeter of properties, but nonetheless the fencing requirement would be very significant.

There is no evidence of which we are aware of either escape of greyhounds from properties or *harmful* incursion of other animals onto properties (noting, of course, that is an ordinary, natural function of rural or semi-rural existence that animals venture onto properties).

It should be noted that properties in regional areas will often use standard agricultural perimeter fencing (often 1200mm in height and of differing hole sizes) and there is no evidence of harm to greyhounds from use of the same by participants.]

Perimeter fencing must be constructed around the housing and exercise areas at the establishment. **[GOTBA VIC: Such a requirement, even around exercise areas, will give rise to enormous costs.]**

Perimeter fences must provide a second barrier for escape from the establishment but must also provide protection from the entry of unwanted people or animals.

There must be a minimum of two barriers between greyhound and escape.

Perimeter fences must:

- be constructed in a manner to prevent greyhounds escaping from the establishment;
- be a minimum height of 1.5 metres except where 1.8 meters is required

under planning requirements; and

- must be constructed of:
 - brick, concrete, timber, iron or similar solid material; or
 - chain mesh manufactured from 3.15 mm wire to form a uniform 50 mm mesh or 4 mm weld mesh wire with a maximum mesh spacing of 50 mm; or
 - dog wire; and
- must be maintained in a manner which prevents a greyhound from being able to dig out.

6.6.5 Construction of housing pens and yards

[GOTBA VIC: See submissions.]

Greyhound pens and yards must be designed, constructed, serviced and maintained in a way that ensures the good health and well-being of the greyhounds, while preventing escape of greyhounds or injury to humans. [GOTBA VIC: This is an excellent way of expressing the requirement - further mandating is not necessary.]

Fencing for pens and yards must be a minimum height of 1.5 m and maintained in an escape proof condition, with wire mesh hole size not exceeding 75 mm x 50 mm. [GOTBA VIC: Our members are not convinced that such sizing is correct and we are aware of several properties where fencing does not meet these requirements, but nonetheless greyhounds there situated have been inspected as healthy, without known escape or incursion of animals.]

Fencing for puppy yards or pens (puppies less than eight weeks of age) should not exceed a wire mesh hole size of 50 mm x 50 mm. [GOTBA VIC: Our members are not convinced that such sizing is correct and we are aware of several properties where fencing does not meet these requirements, but nonetheless greyhounds there situated have been inspected as healthy, without known escape or incursion of animals.]

Fencing must not allow for contact between greyhounds in adjoining pens or yards, or over the top of the fence. [GOTBA VIC: This is not well expressed. It would seem to suggest that the fencing requirements just mentioned are still inappropriate, as greyhounds can still be in contact.]

[Contact is a part of socialization of the greyhound and safe contact should be encouraged. This should be deleted]

Fencing must be maintained in a manner which prevents a greyhound from being able to dig out [and must have self-locking gates or doors]. [GOTBA VIC: Why on earth should there be this requirement for self-locking gates and doors? It would impose significant further cost just of itself – again for no known benefit. Note that at section 4.5: 'Each individual kennel, cage, or pen must be fitted with a secure closing device that can only be opened by humans.' should be sufficient.]

]

Weatherproof area

All outdoor housing pens and yards must provide 3 sqm of weather proof area (referred to as an outdoor kennel area) per greyhound housed over 16 weeks of age which contains raised sleeping areas.

The flooring of this area must:

- be impervious to liquids to assist cleaning, disinfection and drainage;
- have solid walls; and
- not be constructed of wire.

Materials should be selected for ease of maintenance and cleaning, durability and

non-toxicity.

Where impervious materials capable of conducting heat are utilised, adequate insulation or approved heating or cooling must be incorporated in the ceiling and north and west facing walls to minimise heat conduction. GOTBA VIC: Is this in relation to outdoor housing areas? This doesn't make sense, let alone being appropriate a matter to mandate.

Each greyhound older than 16 weeks of age must be provided with a separate bed or sufficient bedding material so that all animals can sleep comfortably at the same time.

Sleeping areas must contain:

- beds protected from the weather (wind, rain, sun and extremes of climate), vermin [and an area safe from harassment by other animals] [GOTBA VIC: Is this an appropriately expressed in a Code with significant fines/conviction?];
- beds that are not predominantly made of concrete or metal;
- beds that are raised off the ground; and
- soft, warm bedding material that is changed weekly or more often if required. [GOTBA VIC: Changing should not be mandated as a weekly requirement.]

Bedding material must be able to be kept dry at all times and housing must be cleaned daily and disinfected weekly. [GOTBA VIC: Changing should not be mandated as a daily / weekly requirement. It will be unnecessary and imposes an enormous cost.]

The floor of the remaining pen or yard area may be made from any material (except wire), but must be easily cleaned of faeces, old food, etc. This area must not be allowed to become infested with parasites.

The entire pen or yard floor must not be allowed to remain muddy or so dusty that the greyhounds are likely to suffer, or are suffering, from respiratory or eye conditions.

This area must be drained to prevent pooling of liquids. [GOTBA VIC: Again, is this really appropriate in a Code with significant fines/conviction? If it rains, and water pooling develops, will persons face possible conviction, even if the greyhounds in that pen or yard are in perfectly normal condition?]

6.6.6 Construction of indoor kennel facilities

[GOTBA VIC: See submissions.]

All indoor pens must provide the greyhounds with continuous access to natural daylight during the day. Temperature, humidity and ventilation must be managed.

Pen gates must be self-locking [GOTBA VIC: See above. This is absolutely unnecessary] and constructed in a manner to prevent greyhounds escaping.

Sleeping areas must have solid partitions to a height of 1.5 m on three sides. [GOTBA VIC: This should not be mandated – bearing in mind the Code imperative for socialization and contact.] Sleeping areas may have a roof [but the roof height must be a minimum of 1.5 m off the floor]. [GOTBA VIC: We note that this is in the current Code of Practice for the Operation of Greyhound Establishments (at section 3.7.6) but it is not appropriate to mandate this. Many participants have said that some racing greyhounds positively need kennels with lower heights as a health management matter (ie sensitive hocks on greyhounds who make a habit of jumping up and down in their sleeping area – it is not that unusual). This is an example where mandating prevents proper management of the animal in its best interests.]

Pens may be separated by solid partitions, galvanised chain wire or weld mesh

wire dividers with hole size not exceeding 50 mm x 75 mm to prevent contact between greyhounds in neighbouring pens. [GOTBA VIC: See previous submissions in relation to mandating wire size and 'preventing contact'.]

The pens and flooring of the pens must be of a design that will not cause injury to the greyhound. [GOTBA VIC: Well, yes, but is that not a matter to determine by inspection of the greyhound at the property, rather than imposing opinions – which may differ – on what will or will not cause injury in future? We note – again – that there is a natural incentive to do everything possible to minimize the risk of injury to a GRV Greyhound]

The internal surfaces of the external walls of kennel buildings must be constructed of impervious, solid, washable materials to facilitate cleaning and disinfection.

Beds must be raised off the floor and of sufficient size to allow the greyhound to lay down completely stretched out.

Bedding materials must be selected for ease of maintenance and cleaning, durability and non-toxicity.

Ventilation must be adequate to keep housing areas free of dampness, noxious odours and draughts. [GOTBA VIC: Not necessary.]

Fully enclosed kennel areas must:

- have an air change rate of 8-12 changes per hour to prevent the build-up of foul odours; and [GOTBA VIC: What does this mean and why is it mandated?]
- have ventilation devices that avoid draughts and distribute fresh air evenly to all of the housing areas. [GOTBA VIC: Not necessary. Again, the imprecision in a Code that threatens fine and conviction is extraordinary.]

Where forced ventilation is the only form of air, all of the following are required: [GOTBA VIC: Imprecise – save for the last below, which is not necessary as far as the lower temperature is concerned – this should not be included.]

- air recirculation units incorporating effective air cleaning and filtration to ensure the removal of infectious organisms and chemicals;
- a back-up and alarm system must be maintained in case of power failures or breakdown of ventilation and temperature control mechanisms; and
- temperature must be maintained in the range of 10-32°C.

6.6.96.6.8 Minimum housing requirements

A litter may be housed together until the puppies are 16 weeks of age.

A maximum of four adolescent greyhounds between the ages of 16 weeks to 9 months may be housed together, however the proprietor is responsible for ensuring greyhounds are [protected from] harassment or injury by others in the pen. [GOTBA VIC: Not an appropriate expression in a Code with significant fine or conviction – ordinary animal management may mean that absolute 'protection' is neither possible nor appropriate.]

Puppies housed together must be the same age. [GOTBA VIC: GOTBA VIC: We note that this is in the current Code of Practice for the Operation of Greyhound Establishments (at section 3.8) but what does it mean? It is not appropriate to mandate this ('must') anyway – it is ordinary animal management. For example, a forceful 4 month old puppy who dominates her littermates may benefit from being housed with slightly older puppies instead (the littermates who were dominated would also benefit...)]

Establishments may house a maximum of two greyhounds, nine months or older, together. [GOTBA VIC: Not appropriate. Participants may have perfectly good reasons to justify housing more than 2 greyhounds together. 'Pack raising' while not predominant, is used to great effect – this is a matter of animal husbandry, again subject to greyhounds on inspection being in good health.]

Female greyhounds near or in season must not be housed with entire male

greyhounds.

All housing and exercise areas must be kept in a clean and hygienic condition and must be cleaned of faeces, uneaten food and soiled bedding material daily.

Female greyhounds within [seven]-days of whelping and female greyhounds with litters under eight weeks of age must be housed in pens with a minimum area of 15 sqm. [GOTBA VIC: See previous comments on the seven day prior requirement at section 6.3.6. See also comments on lactating greyhound pen sizes – this MUST be left up to participants. Mandating the 15 sqm in **all** cases can be positively dangerous to the greyhound puppies – see 6.3.8 and Table 3 below.]

–

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 when they may be housed for up to 48 hours. All greyhounds housed in transport cages must be removed from the cage every two hours during daylight hours to exercise and toilet. All greyhounds housed in transport cages must be exercised at least four times within a 12 hour period during daylight hours for at least 20 minutes at each exercise interval. **[GOTBA VIC: See previous comments on this at section 4.3.]**

Confinement in a transport cage under any other circumstances must be under the direction of a veterinary practitioner.

Exercise areas may be incorporated into housing where each greyhound 16 weeks or older is provided with a minimum of an additional 20 sqm per greyhound to the minimum housing requirement. **[GOTBA VIC: Delete.]**

The identification card of each greyhound housed in each pen must be clearly displayed on the pen. **[GOTBA VIC: Delete. See previous comments on this at section 5.2.2]**

Table 3. Minimum pen sizes for indoor and outdoor housing

Enclosure area for the first greyhound in square metres (sqm)	Minimum width in metres (m)	Additional dimensions for second greyhound in square metres (sqm)	Conditions of housing
<p>3 sqm up to 9 sqm</p> <p>[GOTBA VIC: This minimum pen size is probably too big. It is less in other codes.]</p> <p>[Kennel size should be up to participants – subject to the health of the greyhound being appropriate on inspection.]</p> <p>[We note that the present</p>	<p>1.2 m if greyhound is equal to or less than 70 cm tall at the shoulder.</p> <p>1.5 m if greyhound is greater than 70 cm tall at the shoulder.</p> <p>[GOTBA VIC: Width requirement should not change. It does not change in the current Code.]</p>	<p>Single greyhound housing only.</p> <p>Retired greyhounds must not be housed in this kennel size. [GOTBA VIC: Absolute prohibition not appropriate but we agree this should not usually occur or should be temporary only.]</p> <p>Greyhounds less than 12 months of age must not be housed in less than 10 sqm kennel for more than three hours per day.</p>	<p>Greyhounds must have a minimum of:</p> <ul style="list-style-type: none"> • five breaks per day consisting of toilet and exercise. Each break from the pen must be a minimum of 15 minutes in duration; and • 30 minutes exercise daily – can be split into 2 x 15 minute sessions. <p>Note: on days when the greyhound is racing and the day following a race, there are no requirements to exercise the greyhound.</p> <p>[GOTBA VIC: See comments above in sections 6.3.9 -10 and Table 1. It is just not appropriate to mandate the above in the context of an animal whose exercise is carefully calibrated for a particular purpose, let alone</p>

Code of Practice for the Operation of Greyhound Establishments (at section 3.8) has a minimum 3 sqm requirement.]

welfare beneficial or cost appropriate. Exercise will be carefully managed by participants who have a direct financial incentive to produce fit, healthy greyhounds.]

Enclosure area for the first greyhound in square metres (sqm)	Minimum width in metres (m)	Additional dimensions for second greyhound in square metres (sqm)	Conditions of housing
			<p>Exercise areas incorporated into or made adjacent to housing pens must have a minimum additional area of 20 sqm per greyhound.</p> <p>Breeding greyhounds must have access to 20 sqm exercise area for a minimum of five hours per day. <u>GOTBA VIC: See previous comments on this issue.</u></p> <p>Where greyhounds are being housed in minimum kennel sizes and showing signs of ongoing stress or behavioural stereotypies, they must be assessed by a veterinary practitioner. <u>GOTBA VIC: Why is this not a matter for ordinary animal management by the participant? There should not be mandated need to obtain vet assessment.</u> and management plans implemented, which consider returning the greyhound to pre-training or moving the greyhound to a larger kennel. Muzzling or other physical restrictions of these behaviours are not to be used. <u>GOTBA VIC: Why not, if part of ordinary animal management?</u></p> <p>Greyhounds must be monitored at least five times per day for signs of stress and the development of behavioural stereotypies. <u>GOTBA VIC: This is ridiculous and would impose a significant further cost. Participants manage stressed greyhounds as part of ordinary duties, they should not be told how many times to monitor them per day.</u></p> <p>The establishment's health management plan must include intervention points and management plans for animals showing signs of stress and or development of behavioural</p>

stereotypes. **GOTBA VIC:**
Burdensome overkill.

|

Enclosure area for the first greyhound in square metres (sqm)	Minimum width in metres (m)	Additional dimensions for second greyhound in square metres (sqm)	Conditions of housing
---	-----------------------------	---	-----------------------

If sign of stress are identified, the greyhound must be moved back to a minimum 20 sqm kennel. If improvement is achieved, the greyhound may be gradually introduced to kennels the size of 15 sqm, then 10 sqm then 6 sqm then 3 sqm.

If the greyhound does not improve, an Animal Behaviourist or Veterinary Behaviourist is to be consulted.

GOTBA VIC: See above – just not appropriate to mandate this. Bear in mind that many participants to whom such a requirement would apply would have 20, 30, 40 or even 50 years of greyhound experience and knowledge.

From 9 sqm up to 2.4 m
15 sqm

**GOTBA VIC:
See comments
in previous
section.**

10 sqm per
greyhound
(maximum of 2
greyhounds).

Retired
greyhounds
must not be
housed in this
kennel size.

If housing two
greyhounds,
minimum of 20
sqm is
required.

Greyhounds must have a minimum
of:

- five breaks per day consisting of toilet and exercise. Each break from the pen must be a minimum of 15 minutes in duration; and
- 30 minutes exercise daily – can be split into 2 x 15 minute sessions.

Note: on days when the greyhound is racing and the day following a race, there are no requirements to exercise the greyhound.

Exercise areas incorporated into or made adjacent to housing pens must have a minimum additional area of 20 sqm per greyhound.

Breeding greyhounds must have access to 20 sqm exercise area for a minimum of five hours per day.

Enclosure area for the first greyhound in square metres (sqm)	Minimum width in metres (m)	Additional dimensions for second greyhound in square metres (sqm)	Conditions of housing
---	-----------------------------	---	-----------------------

Greyhounds must be monitored at least five times per day for signs of stress and the development of behavioural stereotypies.

The establishment's health management plan must include intervention points and management plans for animals showing signs of stress and or development of behavioural stereotypies.

If sign of stress are identified, the greyhound must be moved back to a minimum 20 sqm kennel. If improvement is achieved, the greyhound may be gradually introduced to kennels the size of 15 sqm, then 10 sqm then 6 sqm then

3 sqm. If the greyhound does not improve, an Animal Behaviourist or Veterinary Behaviourist is to be consulted.

Enclosure area for the first greyhound in square metres (sqm)	Minimum width in metres (m)	Additional dimensions for second greyhound in square metres (sqm)	Conditions of housing
<p>From 15 sqm up to 20 sqm</p> <p>GOTBA VIC: See comments in previous section.</p>	2.4 m	<p>10 sqm per greyhound (maximum of two greyhounds).</p> <p>If housing two greyhounds a minimum of 25 sqm is required, if three greyhounds the minimum is 35 sqm.</p> <p>Housing one female greyhound and her litter up to eight weeks of age requires no additional space.</p> <p>Housing one female greyhound and her litter 8-16 weeks of age requires additional 15 sqm of space.</p> <p>Housing of a litter of less than 10 puppies at 8-16 weeks of age requires no additional space. For every additional four puppies, an additional 15 sqm is required.</p>	<p>Greyhounds must have a minimum of:</p> <ul style="list-style-type: none"> • four breaks per day consisting of toilet and exercise. Each break from the pen must be a minimum of 15 minutes in duration; and • be exercised in accordance with Table 1 under Section 6.4 of this Code. <p>Note: on days when the greyhound is racing and the day following a race, there are no requirements to exercise the greyhound.</p> <p>Exercise areas incorporated into or made adjacent to housing pens must have a minimum additional area of 20 sqm per greyhound.</p> <p>Greyhounds must be monitored at least five times per day for signs of stress and the development of behavioural stereotypes.</p> <p>The establishment's health management plan must include intervention points and management plans for animals showing signs of stress and or development of behavioural stereotypes.</p> <p>If signs of stress are identified, the greyhound must be moved to larger accommodation and an animal behaviourist or veterinary behaviourist consulted.</p>

Enclosure area for the first greyhound in square metres (sqm)	Minimum width in metres (m)	Additional dimensions for second greyhound in square metres (sqm)	Conditions of housing
20 sqm or more [GOTBA VIC: See comments in previous section.]	5 m	20 sqm per additional greyhound (maximum of four greyhounds). That is, one greyhound would require 20 sqm, two greyhounds would require 40 sqm etc.	Greyhounds must receive minimum handling, socialisation, exercise, training and enrichment as set out in Tables 1 and 2 under Sections 6.4 and 6.5 of this Code. Exercise areas incorporated into or made adjacent to housing pens must have a minimum additional area of 20 sqm per greyhound.

6.6.106.6.9 Toileting yards

[GOTBA VIC: This section is an excellent example of mandating size that has almost no regard to the keeping of racing greyhounds. Any toileting yard that is of a size big enough to allow fast movement is likely to be absolutely inappropriate in a pre-training or training context, risking injury or simply not being consistent with the tailored exercise regimen necessary in the lead-up to pre-racing trialling or racing]

Toileting yards (also called empty out yards) must:

- be a minimum area of 15 sqm with a minimum width of 1.5 m; **[GOTBA VIC: See above.]**
- be constructed of materials that will not cause injury to greyhounds; and
- be constructed in a manner to prevent greyhounds from escaping or jumping out [with a minimum fence height of 1.5 m]. **[GOTBA VIC: Bracketed words not necessary or cost effective.]**

Fences may be constructed from: **[GOTBA VIC: See comments in previous section on the lack of need or appropriateness in mandating construction.]**

- wire mesh with a hole size not exceeding 50 mm x 75 mm; or
- solid partitions.

Fencing must:

- be kept in good repair with no holes or inward facing sharp edges, nails etc; and

- not allow greyhounds in neighbouring pens to make contact over the top of the fence.

No more than 4 compatible greyhounds may be toileted together at any one time.

No more than two greyhounds may be toileted in a 15 sqm yard. Each additional greyhound requires an addition 5 sqm of area for toileting. **[GOTBA VIC: Misconceived – see above.]**

The floor of the toileting yard must:

- not be made from wire, but can be made from any other material;
- be easily cleaned of faeces;
- not be allowed to become infested with parasites; and
- not be allowed to remain muddy or sufficiently dusty that the greyhounds are likely to suffer, or are suffering, from respiratory or eye conditions. _

Toileting yards must:

- be drained to prevent pooling of liquids; and **[GOTBA VIC: See comments in previous sections about this in Code of this type.]**
- be cleaned of all faeces immediately after the removal of a greyhound/s from the area and before new greyhounds are introduced to the area.

6.6.116.6.10 Exercise yards

Exercise yards include any areas that contain a greyhound for a period of time, outside normal housing.

An exercise yard is an area of a minimum of 20 sqm with a minimum width of 5 m. An exercise yard is external to the greyhound's normal housing (pen) environment. [Establishments must have separate exercise facilities from normal housing, except where housing pens incorporate additional space for exercise (see section 6.6.7 (*Housing*) of this Code).] **[GOTBA VIC: Delete.]**

[GOTBA VIC: See comments in previous sections about mandating construction types and size.] Exercise yards must be constructed in a manner to prevent greyhounds from escaping or jumping out with a minimum fence height of 1.5 m. Fences may be constructed of:

- wire mesh with a hole size not exceeding 50 mm x 75 mm; or
- solid partitions.

Fencing must:

- be kept in good repair with no holes or inward facing sharp edges, nails etc; and
- not allow greyhounds in neighbouring pens to make contact over the top of the fence. **[GOTBA VIC: See comments in previous sections about contact.]**

The floor of the exercise yard must:

- not be made from wire, but can be made from any other material;
- be easily cleaned of faeces;

- not be allowed to become infested with parasites; and
- not be allowed to remain muddy or sufficiently dusty that the greyhounds are likely to suffer, or are suffering, from respiratory or eye conditions.

Exercise yards must:

- be drained to prevent pooling of liquids; and **[GOTBA VIC: See comments in previous section.]**
- be cleaned of all faeces immediately after the removal of a greyhound/s from the area and before new greyhounds are introduced to the area.

Each greyhound being exercised in an exercise yard must have access to a minimum area of 20 sqm. **[GOTBA VIC: This should not be mandated.]** Up to eight greyhounds may be exercised together in an exercise yard of sufficient size. For example, to exercise two greyhounds, the yard must be a minimum area of 40 sqm with a minimum width of 5 m. To exercise four greyhounds, the yard must be a minimum area of 80 sqm with a minimum width of 5 m and to exercise eight greyhounds, the yard must be a minimum of 160 sqm with a minimum width of 5 m.

Exercise yards, other than day yards that are not attached to normal housing areas must be fully supervised at all times. One staff member can supervise up to 16 greyhounds in exercise yards at one time.

~~6.6.12~~6.6.11 Day yards

[GOTBA VIC: See comments in previous sections about mandating construction types and size.]

Day yards may be used as exercise yards for extended unsupervised exercise (greater than one hour).

Day yards must:

- have an area of at least 3 sqm that offers protection from the weather (sun, wind, rain and other extremes of weather);
- contain a raised bed;
- be a minimum of 20 sqm with a minimum width of 5 m;
- be constructed in a manner that prevents greyhounds from escaping or jumping out with a minimum fence height of 1.5 m;
- be drained to prevent pooling of liquids; and
- be cleaned of all faeces immediately after the removal of a greyhound/s from the area and before new greyhounds are introduced to the area.

A day yard is external to the greyhounds normal housing (pen) environment.

Fences may be constructed of:

- wire mesh with a hole size not exceeding 50 mm x 75 mm; or
- solid partitions.

Fencing must:

- be kept in good repair with no holes or inward facing sharp edges, nails etc; and
- not allow greyhounds in neighbouring yards to make contact over the top of the fence.

The floor of the day yard must:

- not be made from wire, but can be made from any other material;
- be easily cleaned of faeces;
- not be allowed to become infested with parasites; and
- not be allowed to remain muddy or sufficiently dusty that the greyhounds are likely to suffer, or are suffering, from respiratory or eye conditions.

Each greyhound being exercised in a day yard must have access to a minimum area of 20 sqm. Up to 2 greyhounds may be exercised together in a day yard of sufficient size (40 sqm with a minimum width of 5 m).

6.6.136.6.12 Mating areas

When greyhounds are mating naturally, they must be provided with an area physically isolated from all other greyhounds at the establishment. Naturally mating greyhounds must be provided an area of no less than 15 square metres. Naturally mating greyhounds must not be housed together overnight.

6.6.146.6.13 Whelping/lactating areas

Separate whelping areas must be provided for each female greyhound/mother and her puppies containing a whelping box.

The whelping box must be large enough for the female greyhound/mother to lie comfortably while whelping and to accommodate the female greyhound/mother and her puppies for the first 4 weeks after whelping.

The whelping box must have solid sides that can be easily disinfected, and must be of a height that will allow the female greyhound/mother to exit readily but will prevent puppies under 4 weeks from falling out.

Whelping areas must be physically separated from all other greyhounds.

Lactating areas must contain a fully screened bedding area to allow the female greyhound/mother physical separation from all other greyhounds._

Whelping and lactating housing must be maintained at a temperature between 10 and 32°C at all times.

Note

Newborn puppies prefer an ambient temperature of 32°C up until about 4 days of age. After 4 days, the temperature can be gradually reduced over a period of 2–3 weeks. However, during this period of time, the female greyhound/mother may not be comfortable in an environment at a constant 32°C. Breeders should consider installing lamps over bedding areas (25 watt globe is sufficient) for puppies, however it is important to provide an alternative cooler area for the bitch.

It is important to provide a heat source for the puppies, particularly during colder weather, to ensure they can maintain their body temperature as their internal temperature regulation systems are not working at this age._

Sleeping areas must be raised off the floor to prevent draughts, but not be of such a height that puppies could fall out and become injured or stranded.

Lactating/whelping areas must contain bedding that is soft, absorbent and easily disposed of or cleaned and disinfected when soiled.

Note

Bedding material should be chosen very carefully. Deep, thick bedding material can result in adverse outcomes for puppies, such as suffocation or squashing if the puppies get themselves under layers of bedding.

Lactating areas must have a divider to allow the female greyhound/mother access to an area where she cannot be reached by her puppies to allow her to rest.

Whelping and lactating areas must have access to natural daylight._

Construction materials must be selected for ease of maintenance, disinfection and cleaning, durability and non-toxicity.

The identification number of each dog housed in each pen must be clearly displayed on the pen, along with notification if a greyhound in the pen is under veterinary care. **[GOTBA VIC: This seems to be randomly placed in this section. In any event. It is not appropriate for security reasons.]**

6.6.156.6.14 Circular training facilities

A bullring is an example of an enclosed circular training facility. **[GOTBA VIC: So is a race track used for trialling. It does not meet some of the below requirements.]**

Where an enclosed circular training facility is used for general exercise it must meet the minimum exercise area requirements, that is, an area of 20 sqm. Training in a circular training facility must be fully supervised at all times. Circular training facilities must be fully enclosed and constructed of materials that will not cause injury to greyhounds.

Circular training facilities must have a fence of a minimum of 1.2 m and no more than 1.8 m in height. Fences may be constructed of:

- wire mesh with a hole size not exceeding 50 mm x 75 mm; or
- solid partitions (up to 1 m only).

Fencing must be kept in good repair with no holes or inward facing sharp edges, nails etc.

The surface of the circular training facility must:

- be level with no large dips or holes that may cause injury to the greyhound when running;
- not be made of concrete or other materials that could cause injury to the greyhound, such as wood, wire or rough scoria;
- not be allowed to remain muddy or sufficiently dusty that the greyhounds are likely to suffer, or are suffering, from respiratory or eye conditions;
- be cleaned of any faeces after each greyhound is removed from the area;
- be clear of any debris and large weeds; and
- be drained to prevent pooling of liquids.

6.6.166.6.15 Slipping tracks and galloping runs

Slipping tracks and galloping runs are narrow, straight exercise areas, with or without lures, used to gallop greyhounds.

Slipping track and galloping runs must:

- have a minimum width of 2.4 m; and
- have a minimum fence height of 1.2 m. **[GOTBA VIC: These sizes are correct.]**

All exercise in slipping tracks and galloping runs must be fully supervised.

Only one greyhound should be exercised at any given time in a slipping track or galloping run. Slipping tracks and galloping runs used to train two greyhounds simultaneously must have a minimum width of 3.6 m. **[GOTBA VIC: We agree.]**

Fence posts and pickets must be constructed on the outside of the wire and wall partitions to prevent greyhounds from coming into contact with and injuring themselves on the posts and pickets while running.

Slipping tracks and galloping runs constructed alongside of one another must have a minimum fence height of 1.2 m and the adjoining fence must be constructed of solid partitions or wire mesh with a hole size not exceeding 50 mm x 75 mm. **[GOTBA VIC: See previous comments regarding mandating construction types/materials.]**

Fencing must be kept in good repair with no holes or inward facing sharp edges, nails, barbed wire etc.

The surface of the slipping track or galloping run must:

- be level with no large dips or holes that may cause injury to the greyhound when running;
- not be made of concrete or other materials that could cause injury to the greyhound, such as wood, wire or rough scoria;
- not be allowed to remain muddy or sufficiently dusty that the greyhounds are likely to suffer, or are suffering, from respiratory or eye conditions;
- be cleaned of any faeces after each greyhound is removed from the area;
- be clear of any debris and large weeds; and
- be drained to prevent pooling of liquids.

6.6.176.6.16 Trial tracks

A trial track is an area of land used for the purpose of training a greyhound with a mechanical lure. **[GOTBA VIC: A race track is used for trialling. It does not meet some of the below requirements.]**

A trial track includes greyhound trial tracks within the meaning of the *Racing Act 1958* (Vic) and privately owned and used trial tracks.

Trial tracks must:

- be fully supervised at all times when being used by greyhounds;
- have 1.5 m perimeter fence around the area of land containing the trial track to prevent escape of greyhounds or entry of unwanted humans or animals;
- be fully enclosed and constructed of materials that will not cause injury to greyhounds;

- have the outer fencing of the trial track constructed in a manner that prevents injury to greyhounds while running;
- have the outer fencing of the trial tracks constructed in a manner that prevents escape of the greyhound from the trial track; and
- have guidance rails for the inside of the trial track constructed at a height and manner that allows for greyhounds to be visible at all points of the track.

Fence posts and pickets must be constructed on the outside of the wall partitions and rails to prevent greyhounds from coming into contact and injuring themselves on the posts and pickets while running.

Fencing must be kept in good repair with no holes or inward facing sharp edges, nails etc.

The surface of the trial track must:

- be level with no large dips or holes that may cause injury to the greyhound when running;
- not be made of concrete or other materials that could cause injury to the greyhound, such as wood, wire or rough scoria;
- not be allowed to remain muddy or sufficiently dusty that the greyhounds are likely to suffer, or are suffering, from respiratory or eye conditions;
- be cleaned of any faeces after each greyhound is removed from the area;
- be clear of any debris and large weeds; and
- be drained to prevent pooling of liquids.

The mechanical lure must be kept in good working condition at all times.

[GOTBA VIC: Why is this something in the Code – if a mechanical lure breaks down, is the person responsible in breach of this Code? That is ridiculously inappropriate.]

Lure cables must be kept in good repair at all times.

Animals or animal products must not be placed on the lure.

Greyhounds must not have more than one track run per day and no more than three track runs per week. **[GOTBA VIC: This would prevent coursing from occurring at all (3 to 4 runs over a day). This has occurred for 100 years. It must be deleted and betrays a fundamental lack of knowledge of the sport of greyhound racing.]**

Greyhounds known to be incompatible with other greyhounds must be muzzled at all times during trialling.

Starting boxes

Starting boxes must:

- be constructed of materials that can be easily cleaned and disinfected;
- be constructed of materials that will not cause injury to the greyhound;

- have a floor surface made from materials that will offer grip to the greyhound when pushing off, but must not be of a material likely to cause injury to the greyhound's pads;
- have lids and doors that close securely; and
- be kept in good working order at all times.

Greyhounds showing signs of distress must be removed from the starting box.

Starting boxes must be cleaned and disinfected each day when used. **[GOTBA**

VIC: Not appropriate to mandate each day.]

Viewing cages

Viewing cages must:

- be a minimum of 1.2 m in height and a minimum width of 1 m and length of 1.2 m;
- not have a floor made of wire;
- have a roof and be located in an area with appropriate shade and/or protection from the weather (sun, wind, rain and extremes of heat or cold);
- have doors which are self-locking; **[GOTBA VIC: Why?]**
- be cleaned of faeces and urine after the removal of each greyhound from the cage; and
- be disinfected daily. **[GOTBA VIC: Not appropriate – does this occur even when not used?]**

Greyhounds must:

- not spend more than 2 hours at any one time in a viewing cage;
- have access to water at all times while in the viewing cage; **[GOTBA VIC: No. Greyhounds are in the viewing cage for a purpose. They should of course be monitored re need for water but it is not appropriate that they have continuous access.]**
- be continuously monitored for signs of distress while in the viewing cage; and
- be removed from the viewing cage if they are showing any signs of distress. **[GOTBA VIC: A greyhound ought get excited, in some form, in a viewing cage.]**

Race day cages

Race-day cages must:

- be constructed of materials that can be easily cleaned and disinfected;
- be constructed of materials that will not cause injury to the greyhound;
- be cleaned of faeces and urine after the removal of each greyhound; and
- be disinfected after use.

Greyhounds in race-day cages must: **[GOTBA VIC: This shows a lack of understanding of what occurs with greyhounds on a race day. First, a greyhound in a late race on a race programme and kenneled before the first race is highly**

likely to spend more than 4 hours in a race day cage. Second, it will be in that (air-conditioned) cage without access to water and with no person (steward or participant) permitted to open the greyhound's kennel before collection of the dog for a race. The greyhound will be vetted before entry into that kennel and after exit from it, including having its hydration checked. Access to water could unduly affect race performance. As can be seen, the mandating below – typically for this Code – is not necessary.]

- not spend more than 4 hours without the opportunity to toilet; and
- have access to water as needed.

7. Transfer and Sale of greyhounds

All greyhounds being sold, given away or transferred from [GOTBA VIC: This requirement should NOT apply to greyhounds merely transferred for short periods for a specific purpose. See definition of 'transferred'.] the establishment must be accompanied with [a health and management statement and] an up to date GRV treatment record book. [GOTBA VIC: The GRV treatment record – or an extract of it or a FastTrack record – should alone be sufficient.]

Details of any known physical abnormality (including injury) at the time of sale or transfer, any treatment the greyhound is receiving or requires, and how that abnormality may affect the short and long term health and welfare of the greyhound must be included. [GOTBA VIC: No. The Code is asking participants to crystal ball what may or may not happen and is an unnecessary transaction risk – it is for the reasonably informed buyer to make their own calls on this.]

The GRV treatment record book must include vaccination certificates stating the date of the last vaccinations and the due date of the next vaccinations. All greyhounds being sold, given away or transferred to a new owner must have current vaccinations in accordance with the Australian Small Animal Veterinary Association guidelines and their GRV treatment record book must be up to date and provided to the new owner.

All greyhounds being sold, given away or transferred to a new owner must be accompanied by a signed transfer of ownership form which is provided to the new owner upon collection of the greyhound. [GOTBA VIC: Delete – no longer applicable – transfers are made online (FastTrack).]

Purchasers of greyhounds, desexed prior to sale, must be provided with a copy of the desexing certificate. [GOTBA VIC: No greyhounds are sold within the industry de-sexed. Delete.]

Greyhound puppies may be sold, given away or transferred to a new owner at any time but must not permanently leave the establishment before eight weeks of age. They may be transported away from the establishment for short periods of time for the purposes of grooming, training and veterinary attention.

All greyhounds must be sold in compliance with the GRV Rules in relation to the sale of dogs. [GOTBA VIC: This should not be in the Code – it is double handling – and would result in a breach of rules being punishable by conviction and a \$38,000 fine.]

Note

It is recommended that owners obtain a signature on the microchip transfer form from the purchaser and submit the form on behalf of themselves and the purchaser [GOTBA VIC: Delete – see above.]. This will ensure that microchips

are transferred into the new owner's name promptly. A photocopy of the signed form should be provided to the purchaser.

7.1 Sale or transfer of greyhounds out of the industry

Greyhounds sold, given away or transferred to a person or establishment that is not a member of GRV or registered with GRV must be desexed prior to leaving the greyhound establishment, except where the greyhound is surrendered to a council registered pound or shelter. _

[GOTBA VIC: Why for example should a person who might choose to temporarily place their greyhounds with an ordinary commercial boarding facility (say, for a weekend holiday) be forced to de-sex their greyhound?]

[GOTBA VIC appreciates that there are sound policy reasons why it is appropriate that greyhounds permanently transferred out of the industry are de-sexed, but that should be a matter for the new owner / transferee to decide. It would not be possible for the greyhound transferred to be bred to create greyhounds that could then be raced, due to various breeding and registration protocols that could not be met.]

GRV must be notified of the name, address, local government area, phone number and any other relevant contact details of the new owner (including a pound or shelter) in the format approved by GRV. GRV must be provided with a copy of the desexing certificate for the greyhound where appropriate. _

[GOTBA VIC: We understand why this is appropriate from a greyhound tracking point of view but have concerns about the appropriateness and privacy implications for the new owner, who is not a greyhound racing participant.]

Greyhounds retired from training or racing that have not completed the retirement preparation must be accompanied by a signed greyhound adoption declaration and a greyhound rehoming statement (see Section 6.3.12 of this Code).

Note

Pounds and shelters generally charge a surrender fee and this surrender fee may be more if a greyhound is entire when surrendered.

New owners must be provided with literature about:

- appropriate feeding;
- exercise;
- parasite control;
- housing;
- responsible pet ownership, including current legislation covering the registration of pet greyhounds with local council and any available training opportunities;
- importance of training and socialisation of dogs;
- vaccination; and

- the greyhound's GRV treatment record book including a Health and Management Statement.

Literature is available free of charge on the DEDJTR website, through local councils, or on the GRV website.

7.2 Guarantee for sale or transfer of greyhounds out of the industry

Where a greyhound is returned to the former owner within 21 days of sale accompanied by a statement from a veterinary practitioner that the greyhound is unacceptable for health or behavioural reasons, the former owner must take back the greyhound and refund 100% of the purchase price.

[GOTBA VIC: The body of the text (over and above the heading) needs to refer to transfers or sales out of the industry.]

[This is nonetheless not an appropriate requirement – PARTICULARLY if the participant has disclosed all matters to the transferee. While such transfers are usually made for no consideration (ie often a participant, if the dog is de-sexed, will bear those costs), the return of the dog may not be appropriate or practicable.]

Note

The payment of refunds should be made upon presentation of the greyhound and a signed certificate from a veterinary practitioner for the 21-day return clause.

The purchaser cannot keep the greyhound and request a refund.

8. Hobby Establishments

[GOTBA VIC: See submissions.]

The below does not reflect what the industry considers to be a hobby establishment, which is generally characterized by the principal registered person in charge being in full-time work outside greyhound racing or keeping. Such hobbyist may have a small team or greyhounds or maybe breed one or two litters. There is no set number.

The vast majority of greyhound participants are hobbyists – and the vast majority of greyhounds by number are under the control of these hobbyists. It is these hobbyists who keep greyhound racing viable, especially clubs etc in regional areas of the State.

This Code effectively applies the administrative burden of a full-time business to hobbyists – on top of their other full-time obligation – not to mention the vast majority of the cost implications of that burden.

The Code is unachievable to the extent it does this.

This is particularly disappointing in that the hobbyist is the one most likely to pay particular individual care and attention to their greyhounds and make every effort possible.

A Code that is based on outcomes – rather than prescription – backed by inspection of greyhounds and establishments (the latter predicated on the health of greyhounds at the establishment) can apply to hobbyists without the deleterious effects of the currently proposed Code.]

Hobby establishments are defined in this Code as establishments with no more than two greyhounds over the age of 16 weeks.

Hobby establishments may house up to two compatible adult greyhounds and one litter (under 16 weeks of age) together in their home **[GOTBA VIC: This shows a lack of understanding – a participant is most unlikely to have racing greyhounds actually living inside a home and will almost certainly have some form of pen or facility on the property.]** without the requirement to build housing pens or yards.

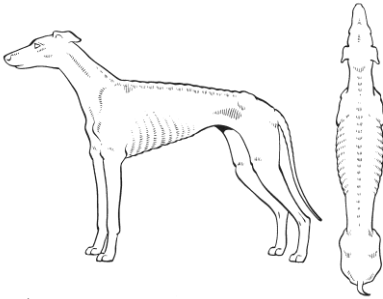
All other requirements of this Code must be adhered to.

Should pens or yards be constructed, they must meet the minimum standards provided for in this Code. **[GOTBA VIC: See above.]**

9. Appendix 1

6.6.186.6.17 Body Conditions Score Chart – Greyhounds

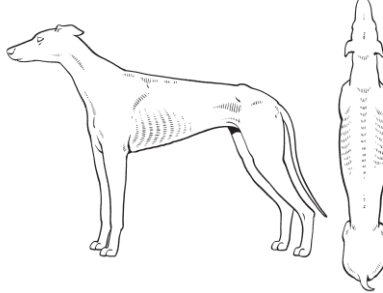
Emaciated



- Individual ribs, spine and pelvis prominent and evident from a distance.
- Lack of muscle mass.
- Little or no body fat.
- Rump hollow.
- Waist prominent when viewed from above.
- Abdomen obviously tucked up.
- Neck thin.
- No fat on tail.

Veterinary advice must be sought.

Thin



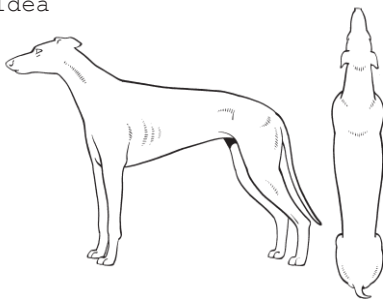
- Ribs, spine and pelvis bones visible and easily felt.
- Little body fat.
- Neck thin.
- Abdomen tucked up.
- Little fat on tail.

Obvious waist when viewed from above. Increase feeding and worm dog if not wormed recently (ensure all-wormer used – some products do not cover all worms).

Seek veterinary advice if dog remains underweight or unsure of feeding or worming regime.

Racing greyhounds have a condition score half way between thin and ideal.

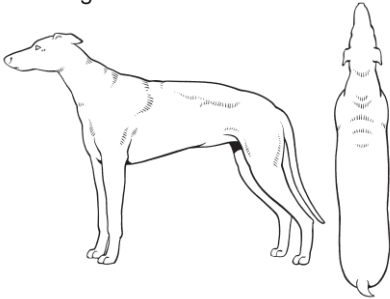
Ideal



- Ribs and spine can be felt, last few ribs may be visible.
- Dog should have a waist when viewed from above.
- Belly is tucked up when viewed from side.
- Good muscle mass.
- Rump well muscled.

6.6.196.6.18 Body Conditions Score Chart – Greyhounds (continued)

Overweight

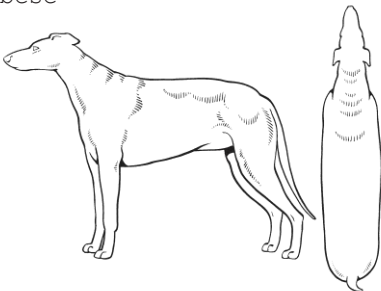


- Ribs and spine not visible but can be felt.
- Fat deposit on tail.
- Little or no waist when viewed from above, rounded appearance, back appears broadened.
- Dog squarish along back line when viewed from side.
- Abdomen not tucked up, may appear rounded underneath.

Reduce feed intake or provide lower calorie feed. Increase exercise.

Seek veterinary advice if unsure of appropriate diet or concerns over exercise regime.

Obese



- Ribs and spine not visible and difficult to feel.
- Tail has obvious fat deposit.
- No waist and back broadened when viewed from above.
- Belly obviously rounded and possibly distended.
- Dog square or rounded up along back line when viewed from side.

Seek veterinary advice on diet and exercise regime.

Source: www.vic.gov.au/pets

10. Appendix 2

10.1 Identifying stress and anxiety in greyhounds

The behaviours listed below may indicate that a greyhound is stressed or anxious.

If these signs occur and do not resolve quickly (within a few minutes) then intervention is required.

First identify the trigger or cause of the stress or anxiety, then either remove the greyhound from the situation or remove the trigger or cause.

Stress or anxious behaviour

- Cowering/shaking/shivering/trembling
- Tucked tail
- Ears back
- Avoidance
- Disengaging/ loss of focus
- Freezing in response to stimulus
- Hypervigilance
- Muscle tension
- Panting – excessive (no heat or exercise)
- Yawning
- Teeth chattering
- Lip smacking
- Lip licking
- Cheek puffing
- Unresponsive dilated pupils
- Pacing
- Salivation

Development of Behavioural Stereotypies

Behaviours that occur out of a normal context and/or become abnormal in frequency, duration or intensity, indicate that the greyhound is suffering from a stereotypical or compulsive behaviour, and may develop stereotypic behaviour. Stereotypies are indicative of poor welfare. If you notice any serious signs of suffering or welfare problems seek veterinary help.

Early intervention is the key to preventing the development of stereotypies.

Examples of common stereotypical behaviours

Repetitive behaviour such as

- excessive licking (environment, self, other greyhounds)

Bopping

Pacing / circling / spinning (worn pads)

Weaving

Destructive behaviour such as

- chewing wire, beds or bowls

Barking – persistent (howling)

Preventing Separation anxiety

Helping greyhounds learn to spend time alone can be useful in preventing the development of separation anxiety. Any time they spend alone must be experienced as positive and relaxing to make this successful. When separating the greyhound from companions and people, ensure the experience is positive and rewarding by providing a desirable long lasting food item or toy. If the greyhound is stressed and doesn't settle within five minutes then you should end the session and next time leave them alone for a shorter time, so they do not become anxious.

Age	Indicators	Intervention Options
8-16 Weeks	Prevention of separation anxiety	Isolation in novel area – isolation from humans and other greyhounds with a kong or other reward. Two times weekly. 5 minutes building to 30 minutes.
16 Weeks + Ongoing	Prevention of separation anxiety	Two times per month. 30 minutes to an hour (vary length of time).
Retirement Training	Prevention of separation anxiety	Three times weekly build to 2-3 hours. Isolation from greyhounds and humans.

*At any stage if the greyhound is showing signs of stress then stop and seek help.



VICTORIA

State
Government

vic.gov.au/pets