

8th February 2022

To Hon Dr Steven Miles

Deputy Premier

Minister for State Development, Infrastructure, Local Government and Planning

**ANIMAL WELFARE LEAGUE QUEENSLAND SUBMISSION REGARDING
Ministerial Infrastructure Development Request
MID-1021-0543 - Greater Brisbane Greyhound Centre in Ipswich**

**This is a submission in objection to the Ministerial Infrastructure
Development Request MID-1021-0543 - Greater Brisbane Greyhound Centre.**

AWLQ strongly objects to this proposal for the reasons outlined below.

Racing Queensland is seeking a Ministerial infrastructure designation (MID). An MID is for the delivery of **essential community infrastructure**, for example, **hospitals, schools, police/ambulance/fire stations, power lines, water supply infrastructure and sewerage treatment plans.**

It is shameful that the Queensland Government would choose to use this designation for a greyhound racing track whose primary purpose is gambling. The provision of a small community space for a dog park and the options for future development of an athletics track are not the primary purpose of the development. **A greyhound racing track is clearly not essential community infrastructure.**

Greyhound racing creates suffering for both people and animals.

1. Racing Qld claim this Greyhound Racing Centre has animal care at the centre of its design and construction. **However, the greyhound racing industry still has, and will continue to have, thousands of dogs suffering and dying each year.** This is because:

A. There will always be many surplus greyhounds. Only the fastest are needed and the others are surplus to be disposed of. **It is already impossible to adopt all of the greyhounds discarded** so that the industry can maintain its purpose to generate the most profit from prize money and gambling. **If the industry expands, which is the intention of the new centre, it will be catastrophic.**

- **Racing Queensland's Greyhound Adoption Program only saves a very small proportion of racing greyhounds.** In 2020/21, of the 817 racing greyhounds reported by owners to the Queensland Racing Integrity Commission (QRIC) as retired, only 173 went to the Greyhound Adoption Program (and 30 were euthanized by the Greyhound Adoption Program due to health or behavioural issues).

- **Only 90 greyhounds went to other adoption programs in 2020/21.**

B. Racing greyhounds live impoverished lives. They are difficult to rehome, having been kept in kennels for their whole lives. **They usually take many months of rehabilitation.**

- The lack of socialisation of a racing greyhound is heartbreaking. All greyhounds that come into Animal Welfare League Qld's (AWLQ) care have to be sent out to specific foster carers trained in how to look after a greyhound while transitioning from racing life to pet life. Some of these dogs are so malnourished they need an extra high protein diet to help build up their weight. They need to learn about living in a home, meeting dogs other than greyhounds, socialising with children and different people. This can take months depending on how underweight, mentally distressed, or abused a greyhound is when they come into AWLQ's care.
- Some dogs are given away by their owners to new owners who have no idea what is needed to rehabilitate a racing greyhound e.g. Opal, a very timid dog who was very unsure about the outside world was first adopted to a family by a trainer who was giving his dogs away free on Gumtree. Sadly, her new owners kept her outside in the backyard with little interaction with the family and no vet care. She was eventually surrendered to AWLQ where she spent a long time in foster care with a family who understood her needs as they had another rescue greyhound. After such a long period with them they decided to adopt her permanently. She has come such a long way but still is uncomfortable in some situations when in public.
- Greyhound rehabilitation is costly and labour intensive. The industry does not contribute to the costs for community groups trying to save the lives of these greyhounds.

C. The injury rate for greyhounds is high and injury will still occur despite a new track design and facilities.

In Queensland greyhound racing, in 2020/21, on-track veterinarians reported **1308 injury incidents for the 1690 greyhounds who raced. 53 greyhounds had catastrophic injuries resulting in death or euthanasia.** There were **213 major injuries** (16% of all injuries) involving significant muscle tears, bone fractures or other injuries resulting in greyhounds being off racing for up to 90 days or never racing again. **A further 266 injuries (20% of injuries) including lacerations, sprains and muscle strains** required up to 21 days off racing.

The greyhound industry claims this centre will set new standards for pre-race preparation and post-race recovery and different track designs. **However, injuries are inherent in greyhound racing due to a range of factors.** One of the consultants for the new project, David Eager, states: "In the greyhound racing sports industry, injuries to dogs are highly prevalent." (Hossain, I., Eager, D & Walker, P. 2020, p. 1) In order to show trends in track path renovation changes, he assumes minimal differences in "other contributing factors to injury rates such as variations in weather, track maintaining conditions, different greyhound breeds and training patterns, race operating conditions" (Hossain, I., Eager, D & Walker, P. 2020, *Greyhound racing ideal trajectory path generation for straight to bend based on jerk rate minimization*. Nature Research Scientific Reports p.10). Current changes in track curvature elsewhere in Australia only reduced catastrophic or major injury from 4.58 per 1000 race starts to 4.22 (8% reduction) The reduction in all types of injuries was 45 to 27 per 1000 race starts, a 40% reduction. (Hossain, I., Eager, D & Walker, P. 2020, p.11).

D. **Racing greyhounds are often drugged** with a range of banned substances which can have serious psychological and physical effects. The Sydney Morning Herald reported in 2018 that greyhounds test positive for drugs 10 times more than horses at races.

E. **Racing greyhounds are exported to other countries** that have poor or no animal welfare protections and are also vulnerable to entering the dog meat trade. Racing Qld are proposing this as an international venue. Greyhounds from countries with poor welfare will likely be raced, and the trade in greyhounds is likely to increase.

F. **The greyhound racing industry is still not fully transparent**, despite the Queensland Racing Integrity Commission being created to monitor and track greyhounds, following the 2015 exposure of the widespread live baiting (using live animals e.g. rabbits, possums and piglets), along with mass graves, animal cruelty, drug use, and other serious animal welfare issues. The QRIC Annual Report does not state clearly how many greyhounds there are at different stages of their racing career in Queensland, along with their fate, so progress can be determined. Separate quarterly reports provide some figures which are not all tallied for the year, which makes analysis difficult.

The recommendation in the Queensland MacSporran Report that when a greyhound pup is registered the required registration fee should include a component for the future welfare of the dog has not been implemented six years after the inquiry. <https://qric.qld.gov.au/wp-content/uploads/2020/03/Implementation-status-of-MacSporran-recommendations.pdf>

2. Wildlife will suffer due to the location of this proposed Racing Centre

The Environmental Assessment Report stated that the proposed location contains **Matter of National Environmental Significance Koala habitat** that is considered to be critical to the survival of the Koala. While Racing Qld claims its vegetation clearing will be minimised, it is not just the removal of these trees that will impact on the survival of the koala and other native species.

The site is mainly located in the terrestrial state biodiversity corridor which is **connected via remnant and regrowth vegetation to the largest remaining continuous stretch of open eucalypt forest in SE Qld** (DE 2021). Koalas depend on such corridors to find sufficient food and roam safely sometimes many kilometres to find a mate. Racing dogs, loudspeakers, cars, noisy people, and bright track lights seven days a week will severely impact on the capacity for koalas and other native wildlife in this corridor to survive.

The site will also have potential direct impacts in the vicinity of a potential Threatened Ecological Community Swamp Tea Tree Forest of SE Queensland, listed as Critically Endangered under the *Environment Protection and Biodiversity Conservation Act*.

It is also close to culturally significant areas and artifacts that are sacred to First Nations people.

3. Humans suffer from greyhound racing

More than a billion dollars was spent gambling on greyhound racing in Queensland in 2018 19. The majority of this betting occurred in Brisbane and Ipswich. (IER Pty Ltd, Size and Scope of the Qld Racing Industry Report, July 2000 pp 54,55).

The Qld Government Queensland Household Gambling Survey 2016-17 revealed that **about 18 per cent of Queensland adults had bet on horse, harness or greyhound races.**

The impacts of gambling are enormous on the individuals who gamble, their families and the whole community whose taxes fund the health system. The survey found that:

- Almost all problem gamblers (over 90 per cent) had experienced gambling-related health problems, and about three quarters of them had experienced financial problems associated with their gambling during the previous year.
- About 19 per cent of low-risk gamblers, 22 per cent of moderate risk gamblers and 52 per cent of problem gamblers had felt seriously depressed in the last 12 months.
- Almost half of all low risk, moderate risk and problem gamblers had gambled while under the influence of alcohol or other drugs.
- Overall, about 7 per cent of Queensland adults had experienced emotional problems because of someone else's gambling, 6 per cent had experienced financial problems and 5 per cent had experienced relationship problems.
- About 14% of problem gamblers had experienced each of these kinds of problems because of someone else's gambling.

4. The MID Environmental Assessment Report has almost nothing to report in the Summary of Public Benefit. It mentions only:

- a. better facilities and tracks which set new standards for the greyhound racing industry.
However, injuries to greyhounds are inherent in racing and new facilities cannot prevent injury (See evidence in 2C. above from the industries' own consultant). As well, the surplus of greyhounds is inevitable with inherent difficulties and huge costs in finding homes for greyhounds (see 1A & B above).
- b. Construction is expected to support 1000 full-time jobs during construction and long term employment opportunities to support operations
Racing Qld's claim that this new racing track will create and generate huge benefits for the region's economy **are not substantiated.**

There are so many more positive construction projects which the Qld Government could spend \$40 million on, which would benefit the whole community – people and animals – providing jobs at time of construction and into the future.

\$40 million could provide an Ipswich Wildlife and Conservation Centre on this site, with more jobs for the Ipswich community to develop and maintain it – and enjoy it, whilst preventing harm to greyhounds and enhancing the well-being of native wildlife.

It could include:

- **Managed koala habitat and forest regeneration**
- **Aboriginal culture and heritage preservation**
- **Observation walks**
- **Hospitality – café and restaurant**
- **Education Programs**

The greyhound racing industry claims long term employment opportunities. However, the greyhound industry only directly provides **about 216 fulltime equivalent jobs** in the Ipswich region (approx. one third of the 650 fulltime equivalent jobs created by horse, harness, and greyhound racing in the region). There are only 1000 people who participate in the industry in the Ipswich region, including all employees, trainers, breeders, owners, jockeys, drivers, stable hands and volunteers, **from occasional to full-time.**

The overwhelming majority of Queenslanders are not interested in attending greyhound racing. Less than 2% of the Brisbane and Ipswich regions population attended greyhound races in 2018/19. Only 216 people (less than .008% of these populations) were members of

the Ipswich and Brisbane Greyhound Racing Clubs. (IER Pty Ltd, Size and Scope of the Qld Racing Industry Report, July 2000 p.47/48; 84/85).

The Qld Government Queensland Household Gambling Survey 2016-17 also revealed that **gamblers were overall more likely to have placed bets on horse, harness or greyhound races at a club or hotel (37.7 per cent), a stand-alone TAB (31.0 per cent) and the internet, using a website or mobile app (28.2 per cent) in the previous year.**

A \$40 million racetrack in Ipswich will be **an expensive filming studio to televise racing greyhounds for mainly online gamblers.**

c. the repurposing of existing greyhound racing sites i.e. Albion for an Olympic Venue in 2032 and Ipswich for other uses more commensurate with the showground's location.

In 2015, governments across Australia put the racing industry on notice due to its horrific record of cruelty and inability to address concerns. It was found that **the industry cannot protect greyhounds from death, injury, and stress.** It also creates hardship for families from gambling.

This is an ideal opportunity for greyhound racing to be phased out, providing several years during the design of Olympic facilities and before construction starts for the industry to wind down and the small number of participants to find less harmful activities.

To put \$40 million of gambling revenue back into prolonging the greyhound racing industry that results in more misery, and health costs, to the whole community shows a lack of concern for the well-being of Queenslanders. It is hypocritical to be shifting such an outdated and harmful industry to a new facility in Ipswich which has many struggling low socio-economic areas, whilst supporting the Olympic Games which inspires healthy sporting activities, positive entertainment, and friendly international relations. A positive project such as an **Ipswich Wildlife and Conservation Centre** would enhance the reputation of the area and the Queensland Government.

In Summary

- **A Ministerial Infrastructure Designation normally used for essential services that enhance safety and well-being is entirely inappropriate for this primarily gambling facility.**
- **Creating a new facility will only prolong a harmful industry causing unavoidable suffering of animals, and people through gambling.**
- **Less than 2% of the region's population attend greyhound races.**
- **Governments should be funding facilities which support the health and well-being of people and animals.**

AWLQ therefore urges you to reject this proposal.

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