

Statement of reasons for the Code of Practice for the Keeping of Racing Greyhounds

Draft Code content (relevant section)	Relevant section/s in final Code	Issues raised in submissions	Submission feedback/suggested change	Department's response/resulting changes
NA	1	There is no grandfather clause for existing establishments	Insert a grandfather clause acknowledging existing establishments	A grandfather clause has been inserted for existing establishments. This allows existing establishments to delay compliance with section 6.7 of the Code (Facilities), as far as the provisions relate to facility construction, where all facilities must be compliant upon replacement, or by a date specified by GRV where any welfare or safety issues are identified.
Handling: grooming, soft patting/stroking, lifting, turning... (2)	2	Human contact while feeding, cleaning etc. should be included	Amend definition to recognise all human contact	Definition amended in the Code to specify "any physical human contact with a greyhound, including..."
Heritable defect: means a physical deformity, disease or disorder that is passed on genetically... (2)	2	Too broad	This definition and associated section needs further clarification.	Definition amended in the Code to clarify types of heritable defects which would be subject to the requirements of the Code. That is, those included in the Schedule to the <i>Prevention of Cruelty to Animals Act 1986</i> <ul style="list-style-type: none"> • Von Willebrand's Disease • Progressive Retinal Atrophy • Neuronal Ceroid Lipofuscinosis • Collie Eye Anamoly • Hereditary Cataract
Hobby establishment: means a property that keeps no more than 2 greyhounds over the age of 16 weeks. (2) Professional establishment: means a property that keeps more than 2 racing greyhounds. (2)	2	These definitions do not reflect tax definitions. A hobby establishment should be more than 2 greyhounds. Code should apply to all equally given it is setting minimum standards	Remove distinction between hobby and professional establishment.	Distinction between hobby and professional establishment removed from the Code. Minimum welfare standards as set out in the Code apply equally to all persons keeping racing greyhounds.
NA	2	No definition for emergency in draft Code.	Should be defined (relevant to euthanasia being carried out in an emergency).	Definitions for emergency (as relevant to emergency euthanasia), and general emergency, have been added to the Code.
Staffing – General (3)	3	Too prescriptive, onerous and costly, particularly for hobby establishments. Who will be able to monitor this and how will they monitor this?		The staffing section of the Code has been simplified to remove sections 3.3 to 3.5 of the original draft, while ensuring accountability for greyhound welfare clearly rests with the 'Person in Charge'.

Draft Code content (relevant section)	Relevant section/s in final Code	Issues raised in submissions	Submission feedback/suggested change	Department's response/resulting changes
Staff ratio 1:25 (3.1)	3.2	Is 1:25 sufficient, particularly regarding care of young animals and requirements around handling, enrichment and socialisation Tying into the staffing the time required to be spent on individual greyhound according to age is unnecessary	Suggested re-wording: Animals must be cared for by a sufficient number of personnel, who collectively possess the ability, knowledge and competence necessary to maintain the health and welfare of the animals in accordance with this Code. Provided that animals housed at a greyhound establishment pass vet and welfare inspections regularly made, there should be no mandated (as opposed to recommended) staff ratio and no requirement for constant presence or overnight staffing (at any level).	The Code has been amended to include a staffing ratio as follows: - 1:50 for greyhounds over the age of 16 weeks; and - 1:25 per 25 greyhounds over 50 greyhounds; and - 1:20 for greyhounds under 16 weeks. This accounts for the critical socialisation period for puppies and the requirements of the Code during that time.
Greyhound equivalents (3.1)	NA	Could have up to 99 greyhounds being cared for by 1 staff member. Disagree that single greyhound is equivalent to a litter of up to 4 greyhounds between the age of 16 weeks and 9 months. Litter of puppies is labour intensive.	Review greyhound equivalents.	Equivalents have been removed from the Code and staff ratio amended as per above.
Overnight presence of staff member if over 25 greyhounds/equivalent (3.1)	3.2	Too costly, onerous	Change to 50 greyhounds/ equivalent, except where greyhounds are whelping or ill. Alternatively, use language such as 'adequate monitoring' that will allow the use of security cameras. OR combination: staff presence at all times if over 50 or the installation of adequate monitoring devices.	Overnight staffing requirements of the Code have been amended to the following: - For establishments with 50 or fewer greyhounds, overnight presence is required where a greyhound is showing signs of whelping, is whelping, or ill. - For establishments with 51 or more greyhounds, at least one suitably qualified or experienced person must monitor greyhounds (whether on-site or remote), plus at least one additional person on call. At least two additional persons are required to be on call for establishments with over 100 greyhounds.
Business hours = 8 hour period between the hours of 5 am and 8 pm on any given day (3.1)	3.2	Does not reflect racing industry practices	Remove reference to specific hours and replace business/non-business hours with 'on site'/ 'off site' requirements	Definition of business hours has been removed from the Code. Hours where staff presence is required are specified in the relevant staff sections of the Code.
Break down of roles and responsibilities for Proprietor, Operations Manager, Greyhound attendants, Vehicle driver (3.2-3.5)	3.1	Too prescriptive, not fit-for-purpose for all establishments (e.g. rearing vs. training)	Change language from 'Proprietor' to 'Person in charge' and remove 3.3-3.5	The Code now includes a role for the Person in Charge, that reflects responsibilities of the proprietor, including overall accountability for the welfare of greyhounds at the establishment. Sections 3.3 to 3.5 of the original draft Code have been removed.

Draft Code content (relevant section)	Relevant section/s in final Code	Issues raised in submissions	Submission feedback/suggested change	Department's response/resulting changes
Detailed role of vet (3.6)	4.2	Too costly/onerous, vets with required experience are limited and therefore so is access to them Already a requirement to have a written agreement with an on-call vet May not be possible to have an agreement based on region/availability	Re-frame as more high level role	Role for veterinary practitioner has been slightly simplified in the Code, however the requirement for a written agreement has been retained. The department has consulted extensively and given greyhounds are essentially athletes, therefore subject to injury and requiring specialised care at times, veterinary assistance should be available at short notice (i.e. via an agreement).
Mandatory Training and Education (3.7)	3.3	Duplicates GRV requirements, unnecessary. Mandatory training should be included in the Code.		The Code has been amended to specify mandatory training for <u>new</u> GRV participants to acknowledge experience of existing participants. There is also a recommendation that all GRV participants complete appropriate training to maintain their skills.
Staff Health (3.8)	3.4	Unnecessary to include in the Code		This section has been simplified in the Code to refer to an establishment's induction practices.
Health Management Plans (4.1)	4.1	Too prescriptive, duplicates GRV requirements Annual vet sign off is unnecessary	Change language to Establishment Plan, simplify and include requirements currently at 5.1 of the draft Code Instead of a health management plan; a Business or establishment plan should be implanted which would outline how their kennel property is run with GRV approval	The Code has been amended to include an Establishment and Health Management Plan (EHMP). The EHMP includes overall practices for the establishment, including greyhound welfare and establishment administration. The EHMP has enabled removal of prescription from the Code and provides participants with flexibility to nominate their own tailored protocols for certain activities. The EHMP also aligns with the Health Management Plan in the Code of Practice for the Operation of Breeding and Rearing Businesses (2014). The EHMP must be reviewed annually. It requires initial sign off by a veterinary practitioner and no less than every three years following that.
Ops Manager to euthanase in emergencies (4.2)	4.3	Only vets should euthanase	Remove If remains, define methods considered humane and practicable	Definition for emergency (as relevant to emergency euthanasia) has been added to the Code. EHMP is to include protocols for euthanasia in emergency situations, including approved methods and personnel.
Puppies to be euthanased by intraperitoneal or intravenous injection (4.2)	4.3	Intraperitoneal is highly irritant and would require heavy sedation of puppies	Remove	Intraperitoneal has been removed.
Greyhound transport vehicle to maintain temperature between 10-32°C (4.3)	4.4	Temperature range is too extreme	Consider rather than a range, to stipulate the vehicle must 'protect greyhounds against extremes of temperature' Consider a range of 20-30 °C be adopted (dogs thermoneutral zone)	The Code has been amended to require greyhounds be protected against extremes of temperature, with a recommended range of 16-24°C (a greyhound's thermoneutral zone).
Inspections every 2 hours when transporting greyhounds (4.3)	4.4	Impractical, prohibits interstate travel	Change to inspections every 3 hours with the exception of interstate travel that extends beyond 3 hours?	The Code has been amended to require inspections at least every three hours unless it is unreasonable or unsafe to stop the vehicle. The maximum allowable time spent in airline crates has now been specified as 24 hours.

Draft Code content (relevant section)	Relevant section/s in final Code	Issues raised in submissions	Submission feedback/suggested change	Department's response/resulting changes
Transport vehicles must have means for greyhounds to be physically restrained/separated or individually enclosed (4.3)	4.4	Unnecessary if travelling with a single greyhound	Allow 1 greyhound to be transported in the back (<u>not</u> boot) of a sedan/station wagon	The Code has been amended to include the following : "If two greyhounds are being transported in the cabin of a transport vehicle without a physical barrier, then the greyhounds must be individually restrained <u>and</u> muzzled, except for puppies under 16 weeks of age."
Visitor facilities (4.4)	NA	Impractical, unnecessary	Remove Establishments to have adequate facilities in place to prevent contamination and spread of infection and/or biosecurity hazards?	Establishment induction practices, as well as outbreak management protocols, are to be included in the EHMP. As such, section 4.4 of the original draft Code (i.e. Visitor facilities) has been removed.
Requirement for two physical barriers between greyhound and escape, including perimeter fencing (4.5)	4.5	Perimeter fencing is onerous and costly	1.5m fencing is unnecessary, 1.2m is sufficient Anecdotal evidence of greyhound scaling a suburban fence and being hit by a car.	The Code has been amended and requires two barriers between greyhounds and escape from property unless supervised.
Records to be kept for 5 years (5)	5 7	Should be 2 years	Rather than stipulate a specific timeframe, could it be that records must be kept 'for the entire racing and/or breeding life of the greyhound'?	The Code has been amended to require that a greyhound record is established for each individual greyhound from birth. An up to date greyhound record must accompany every greyhound that is sold, given away or moved from an establishment. The Code also requires that records are kept for any establishments that cease to operate for no less than two years.
Records (5.1, 5.2)	5.1, 5.2	Duplicative, onerous, level of detail required could impact intellectual property Detailed record keeping is necessary for community confidence in the industry	GRV have offered to develop templates for establishment plans that include a milestone approach for certain behaviours in greyhounds (e.g. able to walk on leash by xx months), that allows each establishment to operate with discretion. Records should be made readily available and enable the tracking of individual greyhounds.	The record requirements in the Code have been simplified to assist with interpretation. Majority of the record requirements have been retained, as they are an integral tool to ensure traceability of greyhounds and their health history.
Tetanus immunisation or exemption certificate required (5.1)	NA	Unnecessary	Remove	Requirement for tetanus vaccine has been removed from the Code.
Individual registration of pups with GRV at 7 days old (5.2.1)	5.2	Cannot identify individual pups at this early stage Should have records for puppies from birth	Change to 12 weeks	To reflect the breeding Code, and again ensure complete traceability, the Code has been amended to require records be maintained for each puppy from birth.
Identification card to be clearly displayed on every kennel (5.2.2)	5.2.1	Security risk	Use 'kennel name' or 'unique kennel identifier' that clearly corresponds to a GRV treatment record book.	The Code has been amended to require a "unique identifier" displayed on every kennel or pen that links back to an individual greyhound record. This can be as simple as a microchip number.
Food to be signed off by vet (6.1.1)	6.1.1	Unnecessary, impractical as food can be changed to accommodate changes in circumstance (e.g. weight, weather)	Remove requirement for vet sign off.	The Code has been amended to require protocols for the provision of an appropriate diet for all greyhounds at the establishment be included in the EHMP. This allows GRV participants the flexibility to include general food provisions, or for special dietary requirements to be listed separately.

Draft Code content (relevant section)	Relevant section/s in final Code	Issues raised in submissions	Submission feedback/suggested change	Department's response/resulting changes
Weaned puppies under 16 weeks and dogs between 4-6 months must not be without food for more than 12 hours (6.1.1)	6.1.1	Misinterpreted to mean puppies <u>must be fed at 12 hour intervals</u> .	Clarify language, may be able to simply state "must be fed twice daily" rather than stipulating a time frame	The Code has been amended to remove the reference to a 12 hour period to state that: <ul style="list-style-type: none"> - puppies under 16 weeks must be fed a minimum of three times daily; and - dogs between four to six months must be fed a minimum of twice daily.
Establishment must hold five days' food supply (6.1.1)	6.1.1	Impractical for fresh meat	Change to three days	The Code has been amended to require the following: <p>"Food supply on site must ensure food is available for the animals in the case of an emergency event such as illness (for the Person in Charge), accident or large scale emergency."</p>
Greyhounds must have access to a sufficient supply of fresh clean water at all times (6.1.2)	6.1.2	There are dogs with water diabetes so water must be removed at times There are times where access to water is not practical (e.g. transport) or possible (e.g. at races)	Change language to state "Except where approved by a veterinary practitioner, water must be..."	The Code has been amended to state that "Greyhounds must have access to a sufficient supply of fresh clean water at all times at the establishment, unless advised otherwise by a veterinary practitioner."
Requirements in relation to supplements and injectable substances (6.1.3)	6.1.3	Does not state how these should be stored Enables people other than qualified vets and vet nurses to inject greyhounds	Include storage requirements Consider personnel requirements	The Code has been amended to require that supplements and injectable substances are: <ul style="list-style-type: none"> - stored according to manufacturer's directions; and - administered under the direction of a veterinary practitioner.
Requirements in relation to vaccination (6.2.1, 6.2.2)	6.2.1, 6.2.2	Misinterpreted to mean annual vaccination is required	Clarify language as there is variation in vaccination requirements.	The Code has been amended to require annual vaccination for Canine Cough and clarify ages at which vaccines are required.
Heartworm vaccination (6.2.2)	6.2.2	There is no vaccination for heartworm	Should refer to prevention for heartworm rather than vaccination	The Code has been amended to recommend that "a preventative program for heartworm is administered to all greyhounds".
Annual general health check by a veterinary practitioner (6.2.3)	6.2.3	Unnecessary, costly, onerous Dogs get checked by vets at the race track on a regular basis	Health checks at kennel cough vaccination (annual). Consider health care sections of either the NSW or WA code.	The Code has retained the requirement for an annual health check, this can occur at the time of the annual Canine Cough vaccination.
Breeding females to have general health check four weeks prior to service (6.2.3)	6.3.3	Not possible to predict four weeks before a female will come into season	Reword to "when a female has been selected to be bred with, a vet check is required to assess the suitability of the female for breeding."	The Code has been amended to remove reference to checks for breeding animals at section 6.2.3, as it is covered in section 6.3.2 (breeding males) and 6.3.3 (breeding females). Section 6.3.2 of the Code requires females to have a health check by a veterinary practitioner prior to first service to ensure they are suitable to breed.
Greyhounds not to be muzzled in housing pens and never for more than 30 mins unless directed by vet (6.2.5)	6.2.5	Impractical, may need muzzles to avoid chewing bedding etc., Restricts walks to less than 30 mins.	Consider allowing use of cage/wire muzzles in housing kennels if required for medical or behavioural purposes Review time restriction for particular activities	Section 6.2.5 of the Code has been amended to remove specific reference to barking muzzles and muzzling in housing pens. This is because the Code now prohibits any muzzles that restrict normal and necessary behaviour such as panting and drinking, and maintains the 30 minute limit (with certain exceptions). The suggested amendments recognise the use of muzzles in racing and training environments.

Draft Code content (relevant section)	Relevant section/s in final Code	Issues raised in submissions	Submission feedback/suggested change	Department's response/resulting changes
Barking muzzles for no more than 5 minutes at a time twice per day (6.2.5)	NA	Correct use of a muzzle should not restrict normal and necessary behaviours such as panting and drinking. If used to correct behaviour, need more than 5 minutes.	Barking muzzles should not be allowed, or stipulate they are not to prevent panting or drinking. If greyhounds are barking, require behavioural intervention rather than physical restraint. If Code stipulates that barking muzzles are not to prevent panting or drinking, consider if timeframe could be reviewed.	See comments for changes to section 6.2.5 of the Code (above).
General Breeding (6.3)	<i>Handling and isolation</i> 6.3.9 6.6 Table 1 <i>Whelping area</i> 6.7.12	Handling of pups, the size of housing for pups and the isolation of pups to prevent separation anxiety are impractical.	Review the requirements surrounding handling of pups, the size of housing for pups and the isolation of pups to allow some discretion.	The Code now requires puppies are handled "as appropriate, with at least five minutes of human handling per puppy from no later than three weeks of age." Timing for isolation has been removed from the Code, rather greyhounds must be exposed to multiple opportunities for isolation. The Code now specifies that the whelping area can include adjoining exercise areas or day yards to be incorporated into the overall whelping area. The overall whelping area remains at 15 sqm, as per the previous Code of Practice for the Operation of Greyhound Establishments (the old Code).
Heritable defects (6.3.1)	2 6.3.1	Greyhounds have defects. Some of the great bloodlines have what could be considered heritable defects.	This clause needs more clarification and investigation.	The definition of heritable defect has been clarified in section 2 of the Code.
Breeding males must be at least 24 months of age (6.3.2)	6.3.2	Can determine if a dog is worth breeding at 18 months.	Change to 18 months. Note: breeding Code is 12 months	The Code has been amended to reflect the breeding Code and includes a minimum breeding age of 12 months.
Breeding females must be at least 24 months of age (6.3.3)	6.3.3	Can determine if a dog is worth breeding at 18 months.	Change to 18 months. Note: breeding Code is 12 months	The Code has been amended to reflect the breeding Code and includes a minimum breeding age of 12 months.
Breeding female to have no more than three litters in her lifetime, with an additional two allowed upon vet approval (6.3.3)	6.3.3	No time restraint included	Consider specifying no more than one litter per year	The Code has been amended to state that a female must not have a third litter until the first litter are at least 18 months of age.
Natural mating (6.3.4)	6.3.4	No reference to 'compatible' mating pairs	Consideration should be given to the temperament of mates Should be monitored at all times while together	The Code has been amended to state that "Natural mating pairs must be supervised during mating and physically separated from other greyhounds."
Artificial insemination (AI) may be conducted by a certified technician (6.3.5)	6.3.5	This is a highly invasive procedure and can cause significant pain to the female	AI should only be performed by persons approved by the Frozen Semen Insemination Program	The Code has been amended to require that AI is "conducted by a GRV approved person or a veterinary practitioner."
Pregnant female must go into whelping housing 7 days before due date (6.3.6)	6.3.6	Some females may get agitated if placed in whelping area too early, 14 days considered best practice	Reword – "At least 7 days prior to due date unless likelihood of stress or injury"	The Code has been amended to require a pregnant female move into a whelping area "at least seven days before her due date, unless there is a likelihood of stress or injury."
Continual monitoring required until whelping complete (6.3.6)	6.3.6	Unclear if this means physical presence, some females may not whelp down if a person is present	Adequate and regular monitoring rather than continual	The Code has been amended to require "regular" rather than "continual" monitoring.

Draft Code content (relevant section)	Relevant section/s in final Code	Issues raised in submissions	Submission feedback/suggested change	Department's response/resulting changes
Exercise, socialisation, enrichment and handling of a pregnant female greyhound must remain the same throughout their pregnancy where their health and physical condition allow (6.3.6)	6.6	Dangerous and detrimental to the welfare of the female	Should not require same amount of exercise throughout the pregnancy.	This statement has been removed from section 6.3.6 of the Code as exercise, socialisation and enrichment requirements are covered in Table 1.
Oxytocin must only be administered by a veterinary practitioner (6.3.6)	6.3.6	Dangerous and detrimental to the welfare of the female if a vet is not available to attend the premises.	Oxytocin must only be administered by, or under the direction of, a veterinary practitioner.	The Code has been amended to state that "Oxytocin must only be administered by, <u>or under the direction of</u> , a veterinary practitioner."
Mother should not be separated from pups until they are 8 weeks old (6.3.9)	6.3.9	May need to separate earlier if female is showing signs of stress etc.	Allow discretionary element, e.g. not before 8 weeks unless health of puppies is at risk or female is showing signs of stress. Consider breeding and rearing clauses in the NSW and/or WA code.	The Code has been amended to state that puppies must "not be permanently separated from their mother before 8 weeks of age <u>unless the health of puppies is at risk or the female is showing signs of stress.</u> " The Code also requires veterinary advice be sought if there are concerns for the welfare of the mother or her puppies.
Exposure to different environments and/or changes to environment weekly (6.3.9)	6.3.9 6.6	Frequency may be difficult to implement	Consider frequency	The Code has been amended to include a definition for environmental stimuli and surface. Table 1 of the Code stipulates minimum exercise, socialisation and enrichment for greyhounds, and recognises that these can be achieved cumulatively.
Between 8-16 weeks must be taught to wear a collar and walk on lead (6.3.9)	6.3.9	Can sometimes be done later than 16 weeks	Allow this behaviour to be taught later	From three to sixteen weeks of age is the critical socialisation period for puppies. As such, the Code continues to require that they are taught to wear a collar and walk on a lead during this period.
From 16 weeks, a greyhound must be given at least five hours access per day to an exercise area of at least 20 sqm (6.3.9)	6.6	No discretionary element.	Allow discretionary element.	Table 1 of the Code stipulates minimum exercise, socialisation and enrichment for greyhounds, and recognises that these can be achieved cumulatively. The EHMP provides flexibility for the inclusion of alternative exercise, socialisation and enrichment regimes that must be approved.
From 16 weeks, 10-15 mins of isolation twice a week (6.3.9)	6.3.9	Isolation requirements should not be mandated.	Allow discretionary element.	The Code has been amended to remove specific time frames, but includes the requirement to have "have multiple opportunities for isolation".
Weather permitting, monthly bathing of dogs 16 weeks+ (6.3.9)	6.3.9	Too frequent, can be detrimental to skin health.	Bathing should be "as required"	Code has been amended to require greyhounds 3 to 16 weeks of age "be <u>brushed or bathed</u> in warm water and towel dried once a month (or more frequently as required)." More general bathing/grooming requirements are at section 6.2.4.
Limits on number of greyhounds to be housed together (6.3.9)	6.7.2	Should be a decision for the trainer/rearer. Greyhounds benefit from being housed together.	Allow discretionary element, noting pen/yard size should be adequate.	The Code has been amended to remove housing requirements from section 6.3.9 and include them in section 6.7.2 (minimum housing requirements). Section 6.7.2 states that "Compatible greyhounds may be housed together where pen sizes meet the minimum space allowance in accordance with Table 2 of this Code." There is no need to limit numbers as long as area requirements are met. Note use of the word 'compatible'.

Draft Code content (relevant section)	Relevant section/s in final Code	Issues raised in submissions	Submission feedback/suggested change	Department's response/resulting changes
30-60 mins of isolation twice a week (6.3.10)	6.3.9 4.1	Isolation requirements should not be mandated, particularly for such long periods of time.	Allow discretionary element.	The Code has been amended to remove explicit isolation time frames to allow flexibility for each participant to include this detail in the EHMP. The department has received advice to allow discretion as a minority of greyhounds would experience undue stress if isolation was forced. As such, the Code also recognises isolation requirements may not apply if the greyhound displays signs of stress during isolation.
Exposure to race tracks twice per week, plus exposure to starting boxes, tracks, lures etc. (6.3.10)	6.4 6.6	Should not be mandated in the Code.	Remove reference to track-specific or training specific practices, these should allow discretion.	The Code has been amended and requires that education, pre-training and training practices (as relevant to socialisation and enrichment) must be outlined in the EHMP and include regular exposure to racing facilities.
Must be monitored 5 times per day for signs of stress etc. (6.3.10)	6.4 4.1	Unnecessary	Remove requirement for 5 times and simplify to "monitored for signs of stress, ..."	The Code has been amended to require greyhounds "be monitored for signs of stress." Protocols for daily visual assessments of greyhounds and actions to manage stress must be outlined in the EHMP.
Observations must be recorded daily (6.3.10)	5.2 6.4	Too onerous		The Code has been amended to state that: "Observations of any signs of stress, poor acclimatisation, or development of behavioural stereotypies must be recorded and used as a management tool for assessing the acclimatisation of the greyhound to new housing or changes to daily routine."
Requirements during training (6.3.11)	6.4 6.6	Too prescriptive, does not recognise experience of participants.	Introduce discretionary elements to allow for different approaches.	The Code has been amended to require that education, pre-training and training routines (as relevant to socialisation and enrichment) are specified in the EHMP.
Requirements for retirement and re-homing (6.3.12, 6.3.13)	6.5, 6.5.1	Too prescriptive. Support shifting responsibility to the owner for preparing greyhounds to transition to pet life.	Introduce discretionary elements to allow for different approaches. Consider providing incentives for owners to rehome retired greyhounds.	The Code provides flexibility for participants to outline protocols for retirement and rehoming that differ from those specified in the Code. These protocols must be detailed and approved in the EHMP, or otherwise documented if the person does not have an EHMP. Rehoming without a retirement and rehoming program is allowed, providing appropriate documentation is provided to prospective owners of relevant greyhounds.
Dogs must be walked for minimum of 20 minutes per day in public (6.3.12)	6.5	Difficult for those in regional areas.	Remove 'must'	Where an establishment's protocols differ from those specified in sections 6.5 and 6.5.1, participants have the flexibility to outline these in their approved EHMP.
May surrender to pound or shelter (6.3.13)	6.5.1	Extremely concerned that surrendering at a pound or shelter is considered acceptable way to "rehome"	Review/Remove	The Code has been amended to remove the ability to surrender greyhounds to a pound.
Use of treadmills is to be supervised (6.4)	6.6	Concern that using a treadmill will reduce the dogs' real life experiences and further compromise their adjustment to life after racing	Place limit on use of treadmills (no more than xx mins per day?)	The Code has been amended to state that: "When being used by greyhounds, treadmills must be supervised at all times by a staff member. Use of treadmills must not exceed 20 per cent of the greyhound's total weekly exercise time."

Draft Code content (relevant section)	Relevant section/s in final Code	Issues raised in submissions	Submission feedback/suggested change	Department's response/resulting changes
Table 1 outlines the exercise and enrichment requirements for greyhounds of differing ages and stages	6.6	<p>Too prescriptive.</p> <p>Requirements surrounding exercise, socialisation and enrichment are a crucial aspect of the draft Code and must be retained.</p> <p>Exercise requirements are inadequate, currently allows racing dogs to be kept in kennels for 23.5 hours per day.</p>	<p>Introduce discretionary elements to allow for different approaches.</p> <p>Review time per day of exercise.</p> <p>Exercise should also include other practices in line with athletes e.g. remedial therapies.</p> <p>Reducing exercise requirements from 5 hours per day (rearing) to two 15 minute intervals (pre-training) will cause severe distress.</p>	<p>Table 1 of the Code stipulates minimum exercise, socialisation and enrichment for greyhounds, and recognises that these can be achieved cumulatively. It also recognises that lactating females should not be walked on a lead if they are exhibiting signs of stress.</p> <p>The EHMP could also include alternative exercise regimes that must be approved.</p> <p>Note there is also a requirement for breaks from kennels in section 6.7.2 of the Code.</p>
Must provide toys at all stages/ages (Table 1)	6.6	Toys should not be required for racing dogs.	Change language to enrichment tools? (e.g. could include rope, bones, etc.)??	<p>Table 1 of the Code stipulates minimum exercise, socialisation and enrichment for greyhounds, and recognises that these can be achieved cumulatively.</p> <p>For pre-training, training and racing greyhounds, it requires exposure to different environmental stimuli. This could include toys, or other stimuli as stipulated in the EHMP.</p>
Lactating greyhounds required to be walked 20 mins per day from 7 days within whelping (Table 1)	6.6	Detrimental to the welfare of the female and puppies, should not take female away from pups.	Require female to be exercised daily without specification of time period.	<p>Table 1 of the Code stipulates minimum exercise, socialisation and enrichment for greyhounds, and recognises that these can be achieved cumulatively. It also recognises that lactating females should not be walked on a lead if they are exhibiting signs of stress.</p> <p>The EHMP could also include alternative exercise regimes that must be approved.</p>
Table 2 outlines the socialisation and handling requirements for greyhounds of differing ages and stages	6.6	<p>Too prescriptive.</p> <p>Fails to adequately draw attention to the critical socialisation period for puppies (three weeks through to three months of age).</p>	<p>Introduce discretionary elements to allow for different approaches.</p> <p>Combine with Table 1, include elements that will assist with the transition to retirement and rehoming.</p> <p>Review requirements during critical socialisation period</p>	<p>Table 1 of the Code stipulates minimum exercise, socialisation and enrichment for greyhounds, and recognises that these can be achieved cumulatively.</p> <p>Section 6.3.9 of the Code now explicitly refers to the critical socialisation period, as does the staffing ratio at section 3.2.</p> <p>The EHMP could also include alternative exercise regimes that must be approved.</p>
Five minutes of handling per puppy from 7 days old (Table 2)	6.6	Could be stressful for mother and puppy	Increase age	Table 1 of the Code has been amended to require "five minutes of human handling per puppy daily from no later than three weeks of age." This reflects the critical socialisation period, however allows participants to handle puppies earlier if they wish.
Disinfection and hygiene requirements (6.6.1)	6.7.1	Too prescriptive	Lift up the level of detail	The Code has been amended to simplify disinfection and hygiene requirements.

Draft Code content (relevant section)	Relevant section/s in final Code	Issues raised in submissions	Submission feedback/suggested change	Department's response/resulting changes
<p>Coats, blankets and bedding to be washed weekly (6.6.1)</p> <p>Disinfection of pens once a week (6.6.1)</p>	6.7.1	Onerous, unnecessary	Change to as required and no less than four times per year or when soiled?	<p>The Code has been amended to require that bedding, coats and blankets be cleaned no less than four times per year or more frequently if soiled, or upon being transferred to another dog.</p> <p>The Code has been amended to require that pens are disinfected no less than four times per year (or more often as required) and:</p> <ul style="list-style-type: none"> - prior to the introduction of a new greyhound - prior to whelping; and - upon the removal of puppies.
All establishments to provide isolation area or have agreement with vet to do so (6.6.2)	6.7.3	Costly, may not be possible at smaller establishments		<p>Isolation areas are important for the prevention of spreading of infectious disease. This is also consistent with the breeding Code.</p> <p>All vet practices are required to have isolation housing.</p>
1.5m perimeter property fencing (6.6.4)	6.7.5	Escape is not currently an issue, too costly to implement.	Refer to fences that are primary and secondary barriers to escape. Height of 1.2m is sufficient.	The Code has been amended to require a minimum height of 1.2 meters for barriers to escape.
1.5m fencing and wire mesh hole size not exceeding 75 x 50 mm (several references)	6.7.5	Escape is not currently an issue, too costly to implement.	<p>Fencing height of no less than 1.2m for both primary and secondary barrier fences.</p> <p>Mesh hole size adequate to prevent injury and escape.</p>	The Code has been amended to require barriers or fences are constructed in a manner to prevent greyhounds injuring themselves, escaping from the establishment or digging out. A mesh size is no longer stipulated.
Fencing must not allow for contact of greyhounds in adjoining pens (6.6.5)	6.7.6	Safe contact should be encouraged	Reword to not allow for 'unsafe' contact?	The Code has been amended to ensure barriers or fences do not allow 'unsafe' contact between greyhounds.
Self-locking gates (several references)	NA	Unsafe, can cause injuries to dogs	Remove for housing kennels but could remain for outer gates	The Code has been amended to remove reference to self-locking gates.
3 sqm of weather proof area per greyhound (6.6.5)	6.7.6	Too large	Consider reducing weather proof area required	<p>The Code retains the requirement for 3sqm of weatherproof area, as greyhounds should have shade from sun or protection from rain. However, the Code includes clarification that this is not 3 sqm per greyhound as below:</p> <ul style="list-style-type: none"> - For each additional greyhound housed between 16 weeks and 12 months of age, an additional 1 sqm of weather proof area is required. - For each additional greyhound housed over 12 months of age, an additional 1.5 sqm of weather proof area is required.
Roof height of indoor kennels to be a minimum of 1.5m high (6.6.6)	6.7.7	Lower may be required in instances where greyhounds have sensitive hocks from excessive jumping.	Any roof height generally (outside a specific sleeping area) should allow greyhounds to stand on their hind legs with their front paws raised above their heads, which is a common stance for an excited greyhound.	<p>The Code has been amended to state that:</p> <p>"Roof height (outside a specific sleeping area) must allow greyhounds to stand on their hind legs with their front paws raised above their heads (a common stance for an excited greyhound). Should there be a welfare concern regarding roof height, veterinary practitioner advice may be sought."</p>
Ventilation requirements (6.6.6)	6.7.7	Difficult to understand/interpret	Review necessity	The Code has been amended to simplify ventilation requirements, however retains those requirements for fully enclosed areas in line with the Code of Practice for the operation of Shelters and Pounds.
Whelping areas of 15 sqm (6.6.7)	6.7.2	Too large	5-6 sqm is sufficient	The Code has been amended to allow adjoining exercise areas or day yards to be incorporated into the overall whelping area. The overall whelping area remains at 15 sqm, as per the previous Code of Practice for the Operation of Greyhound Establishments (the old Code).

Draft Code content (relevant section)	Relevant section/s in final Code	Issues raised in submissions	Submission feedback/suggested change	Department's response/resulting changes
Table 3 outlines minimum pen sizes for indoor and outdoor housing	6.7.2	Too prescriptive. Fails to adequately draw attention to the critical socialisation period for puppies (three weeks through to three months of age).	Introduce discretionary elements to allow for different approaches. Recommend mesh divisions between pens when greyhounds are housed individually. Combine with Table 1, include elements that will assist with the transition to retirement and rehoming.	Minimum pen sizes for indoor and outdoor housing are now stipulated in Table 2 of the Code. The general rule is 10 sqm per greyhound as per the old Code. This allows compatible pair housing as long as the enclosure is the required minimum area. Conditions of housing have been removed from Table 2 as they duplicate exercise requirements (now listed in Table 1), and stress monitoring is also referred to in an earlier section (section 6.4). Removed duplication for ease of interpretation.
Five breaks per day (Table 3)	6.7.2	Excessive	Allow discretionary element.	The Code now requires greyhounds have "at least four 15 minute breaks per day."
Kennel width of 1.5m for greyhounds greater than 70cm tall (Table 3)	6.7.2	Unnecessary	Remove distinction between sizes of greyhounds, keep sizing consistent overall.	The Code has been amended to keep width consistent at 1.2 meters.
Retired greyhounds not to be housed in kennels/pens less than 15 sqm (Table 3)	6.7.2 Table 2	Very limiting	Review size	The Code has been amended to allow greyhounds undergoing preparations for retirement and rehoming to be housed in smaller kennel sizes overnight.
Toileting yards to be 15 sqm (6.6.8)	6.7.8	Too big	Minimum of 5 sqm is sufficient	The Code has been amended to require toileting yards be a minimum of 5 sqm. Exercise requirements and requirements for breaks from housing pens are included in relevant sections of the Code.
Exercise yards to be 5m wide (6.6.9)	6.7.9 Table 2		4m is sufficient	The Code has been amended to require a minimum width of 4 meters for exercise yards.
Day yards to be 5m wide (6.6.10)	6.7.10		4m is sufficient	The Code has been amended to require day yards "be of a minimum size that is adequate for the number of greyhounds being housed, as per Table 2 of this Code."
Puppies to be kept at 32 degrees for first four days (6.6.12)	6.7.12	Too warm	Remove note and leave temperature range	The Code has been amended to require that whelping areas are "temperature controlled to protect greyhounds from extremes of temperature at all times (recommended temperature range is between 16°C and 24°C)." There is also a note in relation to extra warming for puppies as required.
Surface of circular training facilities to be level (6.6.14)	6.7.13	Need flooring to be cambered so water runs off	Change language to be safety focused, e.g. free of holes and/or obstacles	The Code includes a consolidated section on training facilities and requires that training facilities must "not have large dips or holes that may cause injury to the greyhound when running."
Sizing of slipping tracks and galloping runs (6.6.14)	6.7.13	Incorrect		The Code includes a consolidated section on training facilities and no longer includes specific sizing for training facilities.
Sizing of trial tracks (6.6.15)	6.7.13	Race track is used for trialling and does not meet the requirements listed	Consider requirements surrounding audio devices attached to lures.	The Code includes a consolidated section on training facilities and no longer includes specific sizing for training facilities.

Draft Code content (relevant section)	Relevant section/s in final Code	Issues raised in submissions	Submission feedback/suggested change	Department's response/resulting changes
Requirements for transfer and sale of greyhounds (7)	7	Too prescriptive There should be requirements in relation to export	Remove some of the detail, e.g. requirements when selling should not apply to short-term transfers. Introduce requirement for application and approval for export of greyhounds from Australia	The Code has been amended to state that "With the exception of providing an up to date greyhound record for each greyhound, these requirements do not apply for short-term transfers (i.e. four weeks or less)." Export is not within scope of the Code.
Requirement for transfer of ownership form (7)	7	Obsolete as this is done online	Remove	The Code has been amended to state that greyhounds being sold, given away or transferred must "be transferred or sold in compliance with the GRV Rules in relation to the transfer or sale of dogs."
Greyhounds must be desexed if being sold, transferred or given away outside of GRV (7.1)	7.1	Should be a matter for the new owner		The Code has been amended to state that "Greyhounds sold, given away or transferred to a person or moved to an establishment (including a registered shelter) that is not registered with GRV must be desexed prior to leaving the greyhound establishment, except if the receiving party have provided written agreement to desex the greyhound."
Guarantee of Sale (7.2)		Not reasonable to give a guarantee when you no longer have control of the animal.	Remove, or state it is only acceptable to refund if the greyhound is returned in the same condition as it was when it was sold.	The Code has been amended to include the following statements: "This guarantee applies only to GRV registered owners rehoming greyhounds to independent community members who are not registered with GRV. It does not apply to a greyhound rehomed to GAP or any other adoption agency, rescue group or shelter." "This guarantee applies only if the greyhound is: <ul style="list-style-type: none"> • returned in the state at which it was sold, or • accompanied by a statement from a veterinary practitioner that the greyhound is unacceptable for health or behavioural reasons that are likely to have been known at the time of sale."

Additional changes as a result of submission feedback and further consultation

1. Commencement date of 1 January 2020 has been included. This allows for implementation planning and training of both participants and authorised officers. This date also allows Animal Welfare Victoria, Greyhound Racing Victoria and industry participants to work on developing the required templates and record keeping capabilities.
2. Definitions have been added/removed to reflect changes made to the Code.
3. The Code includes a requirement for records on unsuccessful attempts to suitably rehome a greyhound, including agencies contacted. This allows transparent tracking of re-homing success and could lead to improvements in greyhound rehoming programs.

Other key issues raised – not related to Code or out of scope

1. The Regulatory Impact Statement (RIS) developed for the Code and released for public comment is inaccurate (e.g. GRC16-001069, GRC16-001224).
Department response: DEDJTR notes and accepts that stakeholders have raised concerns in relation to the accuracy of estimates included in the RIS. Based on extensive further consultation and engagement with key stakeholders to revise the draft Code, revising the existing RIS would not change the content of the final Code. The final Code's development follows engagement with experts, including animal welfare groups and greyhound racing industry participants, to achieve a balance between practicality and flexibility for industry participants and ongoing welfare of racing greyhounds.
2. The Code should explicitly prohibit the use of greyhounds in medical research. In excess of 400 submissions were received on this topic.
Department response: There is a national framework regulating the use of animals for scientific purposes. The National Health and Medical Research Council lead and maintain the *Australian code for the care and use of animals for scientific purposes* (Australian Code). Compliance with the Australian Code is mandated via Victoria's *Prevention of Cruelty to Animals Act 1986*.