

September 1, 2023

Mr Simon Stout  
Chief Executive Officer  
Greyhounds Australasia



Cc: Troy Iwanyk – GCA Executive Officer  
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Dear Simon,

Greyhound Clubs NSW as part of the recent consultation process on NRR amendments made submission via the NSW Greyhound Welfare and Integrity Commission. Copy of the submission has been supplied for your information.

After this submission and the recent Nationals forums, GCNSW is concerned that GA have not received sufficient industry feedback to highlight the serious implications we believe exist on:

**Draft amendment GAR 146 (6)(g):**

**146 Therapeutic substances and screening limits**

...

(6) The following screening limits apply:

(g) ketoprofen at a mass concentration of 5 nanograms per milliliter in a sample of plasma or 10 nanograms per milliliter in a sample of urine.

Or

**GAR 147 (6)(d) Residue substances and residue limits – Procaine**

Draft amendment GAR 147 (6)(d):

**147 Residue substances and residue limits**

...

(6) The following residue limits apply:

(d) procaine at a mass concentration of 5 nanograms per milliliter in a sample of plasma or 200 nanograms per milliliter in a sample of urine.

In NSW, LR138A will continue to apply where procaine is an exempted substance at concentrations equal to or less than 1000ng/ml.

Given our read on the National landscape, GCNSW felt it imperative that further correspondence was submitted to GA with our concerns on the aforementioned proposed rule amendments.

GCNSW holds serious concerns with regards to the setting of threshold limits for substances which can occur via food sources. These concerns are based upon:

- Animals sourced for meat production work to a self reporting system with regards to treatments. Therefore, there is no independent or control measures in place which protect a greyhound participant when purchasing already butchered meat at either pet grade or human grade levels. Even participants which source and butcher their own meat rely on self reporting / trusted relationships to manage the risk which comes with potentially contaminated meat. For commercially sourced meat these risks are increased given mincing by nature will mix multiple animals and therefore increase the initial source risks.
- The impacts of participants seeking out more reliable meat sources (eg Human Grade) would place such significant cost impost on participants, the industry would no longer be sustainable. In preparation for this submission, GCNSW contacted a range of participants to understand estimated meat consumption per week, current costs and projected costs if human grade meat was sourced:

Kennel Size	Kgs per week	Cost p/wk at current average rate \$6.50 p/kg	Cost p/wk at human consumption average rate \$15 p/kg	Per annum variance
Small - 5 greyhounds	21	\$136.50	\$315	\$9,282
Medium - 15 greyhounds	63	\$409.50	\$945	\$27,846
Large – 30 greyhounds	126	\$819	\$1,890	\$55,692

- GCNSW has not be able to access or been provided with evidence which outlines the health or performance impact Ketoprofen may have on a racing greyhound. Given it's anti inflammatory properties, it is assumed that Ketoprofen is prohibited on the premise should it be administered a greyhound may be able to increase it's pain threshold and enhance performance. GCNSW questions the methodology behind the need for thresholds as a result.

Subsequent to GCNSW's submission to GWIC on August 2, 2023, further research found that non reportable accepted limits of procaine in human consumption meat is 0.05mg/kg for chicken thigh, 0.01mg/kg red meat, 0.0025mg/litter Milk. (sourced from [Food Standards Australia](#)) for Ketoprofen 0.05mg/kg red meat and milk (sourced from [Food Standards Australia](#)). While we understand that even higher levels will exist in knackery sourced meats, information obtained via Food Standards Australia's website demonstrate a high threshold in human grade meats. With no way for participants to test prior to meat use and the nature of the strict liability rules, a lowering of these thresholds nationally, in our view will only hurt the industry due to the likely increase in positive samples.

It is GCNSW's position that sufficient measures exist in treatment record requirements, kennel inspections, race day veterinary inspections and increasing industry data systems which can capture and monitor information around treatment of greyhounds where products containing ketoprofen or procaine are used. Utilising these methods to ensure overall greyhound welfare and provision of care is being provided would be a better industry outcome than the proposed threshold amendments.

In addition, as already highlighted within the August 2 submission to GWIC, for amendment GAR 147 (6)(d): variations in rules between jurisdictions enhance the risk to participants when:

- There is movement of greyhound to compete in feature events
- In the event of transfer/sale – what is required withholding time which must be considered by accepting trainer
- When participants race between jurisdictions when residing in close proximity to two or more states.

The proposed amendments include 2 variations where there will be a significant rule position between NSW and other states. The further flow on of this is where there is a significant personnel change Local Rules may easily be removed, further compounding the impact of each rule. GCNSW therefore believes all possible attempts should be made to ensure there is well informed rule decisions made, which thoroughly consider the impact to participants, and where possible offer national uniformity.

GCNSW recently compiled and tabled with GWIC a document which captured in GCNSW's view the challenges participants face in eliminating or reducing risk relative to returning a positive sample. These have been resupplied with this submission in order to provide greater levels of industry context to GA and VAC. GCNSW believes strongly that variation in rules, specifically those relative to permanently prohibited substances, prohibited substances and thresholds further complicates these matters and enhances the risks faced by participants in our view. While GCNSW respects the professional opinion of GA including its members and informing committees such as VAC, GCNSW joins participant advocacy bodies in holding grave concerns on the impact many of the rules place on participants, against the perceived industry integrity gain. As we have elaborated below, in our view some of the proposed amendments significantly increase these imposts.

Finally, all racing rules (National and Local) must also be considered in conjunction with associated penalty structures / guidelines. It is in GCNSW's view, that it is unreasonable to lower thresholds Nationally but then maintain significant variations in how penalties are considered and issued around Australia.

Yours sincerely,



Shayne Stiff  
GCNSW President

