

Interim Regulatory Impact Statement: Future of New Zealand Greyhound Racing Industry

Coversheet

Purpose of Document	
Decision sought:	An urgent high level Cabinet policy decision on the future of the Greyhound Racing industry
Advising agencies:	Department of Internal Affairs
Proposing Ministers:	Minister for Racing
Date finalised:	27 November 2024
Problem Definition	
<p>The future of the greyhound racing industry in New Zealand has been in question since late 2021 when the industry was put on notice. This was largely because of concerns around animal welfare including injuries and deaths.</p> <p>Clarity is needed to give industry participants; the wider racing industry, stakeholders and the New Zealand public certainty to move forward.</p> <p>A decision needs to be made that provides certainty on the future of the greyhound racing industry in New Zealand. Namely, whether or not the New Zealand Greyhound Racing Industry should continue, and if so, under current or amended legislative settings.</p>	
Executive Summary	
<p>There have been concerns about animal welfare outcomes within New Zealand's greyhound racing industry for some time. The last decade saw three reviews into greyhound racing, all leading to recommendations for change, in addition to two parliamentary petitions seeking to ban the activity</p> <p>In September 2021, the Government publicly put the industry on notice. They commissioned the Racing Integrity Board (RIB) to report back by December 2022 on the industry's progress on the issues identified in a report by Sir Bruce Robertson in July 2021, prior to decisions being made regarding the future of the industry. The Government has yet to make a decision.</p> <p>The problem to be addressed is the urgent need to provide certainty on the future of the greyhound racing industry in New Zealand. The issue is whether the New Zealand Greyhound Racing Industry should continue, and if so, under current or amended legislative settings.</p> <p>Three options have been considered:</p> <ul style="list-style-type: none">• Option One: Counterfactual – Industry Continuation under Status Quo Legislative Settings (i.e. no law changes)	

- **Option Two: Industry continuation with increased oversight and regulation**
- **Option Three: Industry Closure**

Options Two and Three would require legislative change.

The Department's view is that the Counterfactual is not a viable option as it would not address some concerns around outcomes and enforcement of animal welfare standards. It would miss the opportunities for operational improvements to the current arrangements. In addition, it would not allay concerns emphasized by Animal Welfare Organisation (AWOs) that Greyhound Racing New Zealand (GRNZ) quickly retracts from progress and slips back into old ways of operating when it is not under review. Ongoing concerns and suspicion would preclude certainty about the industry's future.

Both Options Two and Three are viable and would give more certainty about the industry's future. The preferred option depends on the weighting given to the criteria – Animal Welfare vs economic impact.

This is a value-based decision which will need to balance the acceptability of current and achievable animal welfare outcomes against the impacts of closure on racing industry participants and the wider economy.

Option Two would allow the industry to continue much as it is currently, with its economic and employment benefits, but with increased oversight and regulation. This option would provide for only slightly better animal welfare outcomes compared to the counterfactual, but the changes to rule making functions in the legislation would improve industry transparency and better address the (real or perceived) risk of the industry going backwards in terms of animal welfare. This would involve increased costs for the RIB's additional responsibilities including licensing application management, making animal welfare rules, and continuation of animal welfare program.

Option Three would have the most positive impacts for animal welfare compared to the status quo. However, this option would have the greatest negative impact by ending the industry that supports 1,054 people and adds \$159M value added to the economy. In addition to the overall economic costs with the loss of the industry, there would be direct costs associated with closing the industry including governance, rehoming, additional investigations, monitoring, veterinary support during closure, and industry participant support.

Option Two would bring certainty to the industry, but is unlikely to satisfy Animal Welfare Organisations (AWOs). Option Three would also bring certainty about the industry, but it would be unwelcome to those who depend on it economically.

Limitations and Constraints on Analysis

Limitations and constraints

This interim RIS is intended to support urgent decisions on the future of the Greyhound Racing industry. Further details on option implementation will be covered in a future RIS if appropriate, depending on Cabinet decisions.

Several limitations and constraints on policy development are outlined below.

Time constraints on analysis – The Government wants to take Cabinet decisions by the end of 2024.

To give certainty to the industry, the Government's direction is to take urgent Cabinet decisions on the future of the greyhound racing industry before 31 December 2024.

This has left limited time to test the details of the proposed options.

Limited engagement and consultation on options – There has not been in-depth engagement on proposals given the sensitive nature of this issue

The Department have been continuing to consult with the Racing Integrity Board (RIB), GRNZ and SPCA on various issues. However, the detailed proposals in this paper have not been discussed with key stakeholders, in part to mitigate immediate risks to animal welfare, depending on the option chosen. In particular, if there is a decision to ban the industry, there is a heightened risk of otherwise healthy dogs being destroyed if they are no longer profitable.

Quality of data and evidence – The Department is reliant on information and reports from other sources

In preparing this report, the Department has relied heavily on data and analysis from RIB, GRNZ as well as Select Committee reports and reviews on the racing industry. We have not independently verified the report contents, however, we are confident that the reports provide sufficient evidence to support the high-level decisions in this RIS.

Assumptions

Implementation options will not affect overall analysis - For the purpose of this RIS, options Two and Three are each being considered as high-level options each featuring a combined package of implementation measures. The Department's best consideration at this time supports the assumption that either option could be implemented without affecting the overall comparative analysis contained in this RIS and that generally later changes to aspects of either of these packages would not affect the overall analysis contained in this RIS.

In addition to above, there are other specific assumptions applying to individual options. These are highlighted in the discussion about those options.

Responsible Manager(s) (completed by relevant manager)

9(2)(g)(ii)

27 November 2024

Quality Assurance (completed by QA panel)

Reviewing Agency:	Department of Internal Affairs Regulatory Impact Analysis (RIA) panel
Panel Assessment & Comment:	<p>The panel considers that the information and analysis summarised in the RIS <i>partially meets</i> the quality assurance criteria for an interim RIS.</p> <p>The Interim RIS usefully describes the background and context for the urgent need for a high-level decision on the future of the Greyhound racing industry. While animal welfare concerns relating to publicity for one of the options have precluded consultation on the options themselves, the views of most stakeholders on the broader issues are known and described. Further consultation will be undertaken on implementing the high-level decision.</p> <p>The Interim RIS has had to be prepared within a constrained timeframe, and this is evident in an uneven and sometimes disjointed narrative, and some repetition of evidence and arguments. On this basis it has been assessed as only partially meeting the clear and concise criterion.</p> <p>While the RIS analysis clearly does not consider that making no regulatory change (the counterfactual) is a viable option, it does not identify a clear preference between the remaining two options. It does, however, identify a number of key questions relevant to comparing the merits of the two options. More time for exploring and analysing these issues may have enabled the Department to arrive at indicative positions on some of these issues. Without that further analysis, the panel felt the conclusions in the Interim RIS failed to fully meet the convincing criterion.</p> <p>Despite this, the panel felt the Interim RIS can provides useful support for Cabinet consideration of the key high-level issue.</p>

Section 1: Diagnosing the policy problem

What is the context behind the policy problem and how is the status quo expected to develop?

1. The future of the greyhound racing industry in New Zealand has been in question since late 2021. It is a contentious issue with a high degree of interest from both the industry and animal welfare stakeholders who advocate banning the industry.

Current Size and Nature of Greyhound industry

2. There are approximately 2,922 greyhounds in the greyhound racing industry.¹ This includes 813 pre-racing; 1,297 racing; 114 retired for breeding; and 698 awaiting rehoming.
3. There are a total of 6 greyhound racing clubs and 6 racing tracks (Auckland, Cambridge, Palmerston North, Whanganui, Christchurch, Southland). In 2023/24 there were approximately 390 race meetings and 4,800 total races.
4. According to the Institute of Economic Research (IER)'s January 2024 report on the Size & Scope of the New Zealand Racing Industry², there are 1,054 total full time equivalent (FTE) jobs supported by the industry.³ The industry contributes over \$159.2M value added to the New Zealand economy.⁴ The regions that see the largest economic contribution include:
 - West Coast /Canterbury (\$49.1M and 355 full time equivalent (FTE) jobs supported by industry);
 - Auckland (\$42.3M and 259 FTEs); and
 - Taranaki/Manawatu-Wanganui (\$18M and 133 FTEs).
5. GRNZ's 2023 Annual Report states that TAB NZ's total turnover from greyhound racing last year was \$361.71M (representing 14.22% of TAB NZ's domestic turnover and 23.29% of its overseas turnover).
6. See **Appendix 1** for further detail on employment and population figures.

New Zealand is one of seven countries where greyhound racing remains legal

7. Globally greyhound racing is in decline with many countries having banned the practice with animal welfare being a key concern. It is now legal only in New Zealand, Australia, the United States (in a small number of states), the United Kingdom, and Ireland.
8. In Mexico and Vietnam, while it is still legal there are no longer operational tracks. In some jurisdictions (e.g. Canada) while amateur racing is legal, betting on it is not.
9. In jurisdictions where commercial greyhound racing remains legal, it is subject to similar criticism and reviews as in New Zealand. In South Australia, an independent review was published in December 2023 following footage of dog abuse and the state Government has given the industry two years to improve or 'lose the broader support of South Australians to continue operating.'⁵ ⁶ In New South Wales, the state Government has launched an independent inquiry into Greyhound Racing New South Wales (GRNSW), following allegations of animal abuse by a former GRNSW

¹ As at 13 June 2024. Data provided from RIB to DIA on 14 June 2024.

² https://nztr.co.nz/sites/nztrindustry/files/2024-05/Size%20and%20Scope%20of%20NZ%20Racing%2022-23_Draft%20Report%202024%20%28HR%29_0.pdf

³ This includes directly and indirectly employed people and represents the employment sustained within the industry, as well as the employment that is sustained in supply industries who meet the demand created by racing industry activity

⁴ Value-added contribution is defined as the value of sales less the value of inputs used in production, i.e. it is equal to the income (wages, salaries and profits) generated in production

⁵ <https://www.premier.sa.gov.au/media-releases/news-items/major-reform-recommended-for-greyhound-racing>

⁶ <https://www.rspcasa.org.au/greyhound-racing-inquiry-update/>

vet. The inquiry is expected to report back on 30 April 2025.⁷ Recent petitions seeking closure also have been delivered to the Parliaments of Wales and Scotland.⁸

Industry Animal Welfare Regulatory Setup

10. The Racing Industry Act 2020 (the Racing Act) is predicated on the racing codes largely being self-governing and therefore provides only limited levers for the Minister, or the RIB, to intervene in racing operations and rulemaking, including those relating to animal welfare. The RIB's role in making rules of racing (including those relating to animal welfare) is constrained by current legislative settings. While the RIB enforces the rules of racing, these are set by the codes (i.e. effectively the regulated party, not the regulator; makes rules it is regulated by).
11. Under the Racing Act, codes are required to develop animal welfare policies and initiatives. Codes are also responsible for setting racing rules, including those relating to animal welfare.
12. These rules and policies are enforced by the RIB. The RIB issues fines and penalties for breaches of the racing rules, investigates / enforces race day incidents and conducts kennel audits, visits, and inspections. The RIB's role however in making racing rules is constrained. The RIB does not set any rules and while it can make recommendations to the codes for new rules and rule changes; the codes do not have to accept these. Similarly, the codes set their own key performance indicators (KPIs) with no need to consult other organisations. The lack of animal welfare input into these further leads to transparency & trust concerns.
13. The Ministry for Primary Industries (MPI) and the SPCA also have roles under the Animal Welfare Act 1999 (AW Act) in monitoring and enforcing animal welfare requirements and have a Memorandum of Understanding with the RIB. MPI is primarily interested in animal welfare incidents relating to race days (and may choose to investigate race day incidents notified by RIB). The SPCA is primarily interested in animal welfare incidents relating to non-race days and may choose to investigate non-race day incidents. Each organisation commits to advise the others of significant animal welfare concerns they are aware of and/or are investigating to determine primacy or whether dual investigations are appropriate.

Successive reviews have found animal welfare concerns about the greyhound racing industry

14. There have been concerns about animal welfare practices within New Zealand's greyhound racing industry for some time. The last decade saw three reviews into greyhound racing⁹, all leading to recommendations for change, in addition to two parliamentary petitions¹⁰ to ban the activity.
15. The general reason the overall social licence¹¹ and future of the greyhound racing industry is in question is as a result of its perceived poor animal welfare outcomes which are no longer considered by many to be in line with Government or societal expectations.
16. The most recent report by Sir Bruce Robertson, published in July 2021, highlighted three main areas of concern to be addressed for the social licence of the industry to continue. These were data recording (traceability of dogs), transparency of all activities¹², and animal welfare generally (injuries, euthanasia, kennel conditions, socialisation of dogs and rehoming waiting lists).

⁷<https://www.nsw.gov.au/departments-and-agencies/office-of-racing/inquiry-into-greyhound-racing-nsw>

⁸ These had 35,000 and 130,000 signatures respectively. The Welsh Parliament recently debated a petition committee adjacent report which supported banning the industry. In Scotland a Green Party members bill seeks to ban the industry.

⁹ New Zealand Greyhound Racing Association Independent Welfare Review - WHK (2013), Report to New Zealand Racing Board on Welfare Issues Affecting Greyhound Racing in New Zealand – Hon Rodney Hansen (2017) & Review into Greyhound Racing in New Zealand - Hon Sir Bruce Robertson (2021)

¹⁰ Both petitions from Aaron Cross - spokesperson for the Greyhound Protection League

¹¹ The general public's acceptance of the practices and operating procedures of a given activity or industry.

¹² The Robertson Report noted that "GRNZ has made its job harder by unnecessarily obfuscating information and pushing back against those with an interest. All information should be recorded, and it should be available. Arguably GRNZ has data to support its stances on the issues raised in this report but is seen as unwilling to share this".

17. Groups advocating the closure of the industry have also voiced:
 - a. concerns about the industry's historic track record of poor animal welfare outcomes and the inadequacy of current animal welfare outcomes/practices
 - b. concerns that the industry has had enough opportunities to improve to a more satisfactory level
 - c. a lack of trust in the industry's willingness and ability to improve animal welfare in the long term and concerns that once the industry is no longer under review it will revert to type and lose focus on animal welfare (as has occurred in past)
 - d. concerns about the adequacy of current legislative and regulatory settings under the Racing Act to ensure long term animal welfare improvements can be made.
18. As part of their submission to the 2021 petition, the SPCA said that the greyhound industry "has a history of being unwilling or unable to address its significant animal welfare problems".
19. In September 2021, the Government publicly put the industry on notice and commissioned the Racing Integrity Board (RIB) to report back on the industry's progress on the issues identified by the Robertson review by December 2022.
20. The RIB reported back in December 2022 on whether sufficient improvements had been made. Overall, they assessed that progress was mixed. At the time, of the 15 focus areas, five have been assessed as slow progress, five as adequate and five as good. Specifically, they noted that the injury reduction strategy had delivered improved outcomes. The RIB also noted that it was beyond the scope of the review to "offer opinion or draw conclusions on the social licence of greyhound racing, or to comment on whether the greyhound industry should continue".
21. Further information about the prospect of industry closure was requested from the RIB and a second report was provided in March 2023 to ensure any future decisions were fully informed.¹³

Recent RIB and GRNZ progress reports

22. Since the December 2022 report, GRNZ has continued to work with the RIB to make further progress.
23. The latest quarterly progress reports received from GRNZ and the RIB covering the 2023/24 racing year are generally consistent and agree on the evaluations of progress made. Both of these reports are online¹⁴ and a summary on aspects of these reports is attached as **Appendix 2**.
24. In September 2024 the RIB changed its reporting approach to better differentiate factors which GRNZ has direct control over ('controls') and measurements that may be influenced by factors outside of GRNZ's control ('measurements'). The RIB reported improved performance against the 15 focus areas since the December 2022 final report, noting that GRNZ's controls and compliance were now substantively adequate and align/exceed industry norms for all areas. The updated dashboard is attached as **Appendix 3**.
25. In the 2023/24 season:
 - a. Category D injury rates have improved compared with the 2020/21 season and Category F injury rates have increased. However, neither category met their target. GRNZ's injury rates against comparative Australian data continue to suggest results are within industry norms.
 - b. A total of 673 greyhounds were adopted in the 2023/24 season, an increase of 40% on the 481 adopted in 2022/23 and exceeding the target of 525.

¹³ <https://racingintegrityboard.org.nz/about-us/publications/>

¹⁴ <https://www.grnz.co.nz/Files/Quarterly%20Reports/GRNZ%20July%202024%20Quarterly%20Report%20-%20Final.pdf>; <https://racingintegrityboard.org.nz/wp-content/uploads/2024/09/202409-RIB-QUARTER-4-MINISTERIAL-BRIEFING-Greyhound-Review-FINAL.pdf>

- c. The number of greyhounds that died or were euthanised in the 2023/24 season was 145 (81 euthanised and 64 died) down from 146 in 2022/23 (92 euthanised and 54 died) and 236 in 2021/22 (157 euthanised and 79 deaths).¹⁵ Additionally, RIB reports that there has been a significant reduction the reliance on euthanasia when dealing with injured dogs, or dogs that are difficult to rehome. During the review period GRNZ has implemented a Euthanasia Policy to restrict unnecessary euthanasia, by requiring veterinary approval for euthanasia of greyhounds.¹⁶

26. The RIB noted that **while there has been considerable effort and focus on reducing those injuries that are avoidable, some level of injury is unavoidable.** It also noted that while up from last year, Category D injury rates (serious injuries requiring a 22+ day standdown from racing) have decreased compared to the 2020/21 season; however, Category F injury rates (the most serious injuries requiring a 43+ day standdown) have increased. It also noted these results were comparable to Australian states suggesting injury rates were within industry norms.

Table: - Comparison of injury rates (per 1000 starters) across the last four seasons (Source Racing Integrity Board & Greyhound Racing New Zealand)

	2020/21 (Benchmark)	2022/23	2023/24
Category D Injuries with stand downs of 22 days or more per 1,000 starts	7.02 injuries per 1,000 starts	6.33 injuries per 1,000 starts (9.8% reduction on benchmark against at 10% target reduction)	6.57 injuries per 1,000 starts (6.4% reduction on benchmark against a 15% target reduction)
Category F catastrophic & injuries with 43+ days stand down per 1,000 starts	2.44 injuries per 1,000 starts	2.00 injuries per 1,000 starts Category was not split out as KPI at this time. (19.6% reduction on benchmark)	2.83 injuries per 1,000 starts (16% increase on benchmark against a 15% target reduction)

Note: A comparison with the 2021/22 season is not included as this data has not been reviewed by the RIB for consistency. At this stage, reporting did not split out categories D & F.

Welfare Targets going forward

27. In July 2024 GRNZ updated its welfare targets, The full list of updated welfare targets with commentary on change from previous KPIs is available as **Appendix 4**.

Extract of GRNZ 2024/25 Welfare Targets (version 13 August 2024) with RIB commentary on change from previous KPIs.

	Category	Description	2024/25 Target	2025/26 Target	2026/27 Target	Change from 2023/24 KPI target
1	Euthanasia	Euthanasias outside of GRNZ's Euthanasia Policy	<2% of total euthanasias	<2% of total euthanasias	<2% of total euthanasias	No change.

¹⁵ <https://www.grnz.co.nz/Files/Quarterly%20Reports/GRNZ%20July%202024%20Quarterly%20Report%20-%20Final.pdf>

¹⁶ GRNZ Greyhound Euthanasia Policy Version 2 (December 2024) <https://www.grnz.co.nz/Files/Rules%20and%20Policies/GRNZ%20Greyhound%20Euthanasia%20Policy%20Version%20%201%20December%202024.pdf>

2	Safety	Reduce the number of Category D injuries as per Greyhounds Australasia (GA) classifications (22+ days). Measured as rate per 1,000 starters against a 2020/21 Benchmark of 7.02	10% reduction (6.32 per 1,000 starters)	12.5% reduction (6.14 per 1,000 starters)	15% reduction (5.97 per 1,000 starters)	Target percentage reduction reduced. The RIB recommends reporting injury rates as a 12month rolling average.
3	Safety	Reduce the number of Category F injuries as per GA classifications (43+ days). Measured as rate per 1,000 starters against a 2020/21 Benchmark of 2.25	5% reduction (2.14 per 1,000 starters)	7.5% reduction (2.08 per 1,000 starters)	10% reduction (2.02 per 1,000 starters)	Target percentage reduction reduced. The RIB recommends reporting injury rates as a 12month rolling average.

28. The RIB considers GRNZs revised welfare targets, including decreases to injury targets, are more realistic based on GRNZ's 2023/24 results. On advice from Tara Science's Dr Stephen Grice, the RIB recommends reporting injury rates as a 12-month rolling average to provide a more meaningful measure.
29. The RIB has undertaken some initial work at looking at how the rolling mean measure would have been reported since 2020/21 Quarter 4. This indicates that Category D injury rates during the 2023/24 season were within the typical range of the preceding years (6-7 per 1,000 starters), but Category F injuries recently increased above the typical range of the preceding years (2.0-2.5 per 1,000 starters). The RIB's analysis of these figures to see if these variations are of statistical significance is to be undertaken at the time of drafting this Regulatory Impact Assessment as part of its liaison with GRNZ in support of adopting the new measurement. The RIB will provide the Department with the resulting analysis once it is known.
30. It is possible that GRNZ meets their set injury targets and these rates reduce, but greyhound racing is dangerous. While injuries can be prevented and reduced to some degree, it is unlikely that they would ever be eliminated. However, RIB has also noted that even if GRNZ do everything they can, there will still be injuries.
31. As noted by Rodney Hansen in his 2017 report, *"Greyhound racing is inherently dangerous. Greyhounds race at high speeds in conditions which make injuries almost inevitable"*.
32. If GRNZ continues with their current progress, it would be possible for GRNZ to achieve the recording and transparency objectives of the Robertson Report under current set up. However, negative public perceptions and real difficulties will always remain with this industry. This is the same as for any other animal racing industry.

Other Stakeholder views

33. A number of animal welfare stakeholders are advocating for the closure of the industry and view the industry as unable or unwilling to truly address its problems, and that not enough progress has been made over the years.

34. SPCA officials consider that the industry quickly retracts from progress and slips back into old ways of operating when it is not under review. ¹⁷ Save Animals From Exploitation (SAFE) supports only closure and has no comment to provide on industry continuation.
35. However, while the SPCA's position is that the industry should be closed, in the event of a continuation, SPCA would recommend the following interventions at minimum:
- **Regulation:** ensuring any animal welfare specific rules are drafted independently of the industry, ¹⁸ setting clear examples of breaches under the AW Act, introducing a mechanism to hold the RIB to account, and strengthening kennel audits further.
 - **Breeding and Rehoming:** Flipping the breeding focus so it is linked to rehoming rather than the number of dogs required for racing, and tracking dogs assessed as 'red' ¹⁹ within the rehoming system in order to identify which kennels they are coming from.
 - **Racing:** only racing on straight tracks, pre-race screening, and tightening race day monitoring.
36. Greyhounds As Pets (a rehoming advocacy group) remain neutral on the continuation and are only concerned with rehoming.
37. The New Zealand Veterinary Association (NZVA) is the only membership organisation specifically representing veterinarians in New Zealand. NZVA does not state a preference for continuation or closure. The NZVA believes that the greyhound racing industry in New Zealand should meet both the high standards of animal welfare as prescribed under the AW Act and its supporting regulations and endorses the greyhound racing industry's stated commitment to the proper care and welfare of greyhounds in line with the Five Domains Model of animal welfare.
38. In a briefing to the Minister for Racing in March 2024, NZVA wrote:
- The government's decision on the future of the greyhound industry may depend on factors beyond varying perspectives on the progress that has or must yet be made regarding provisions for improved greyhound welfare. These additional factors include the industry's contribution to the economy and employment, the influences of public sentiment and the economic cost to the industry of close oversight and other necessary welfare initiatives. Whether the industry may continue or must close, the minimisation of adverse welfare impacts on greyhounds must be a principal consideration.*
39. In 2022 the SPCA commissioned an independent survey by Camorra Research which found only 6% of respondents support the continuation of greyhound racing in its current form, 61% support a ban on racing with a transition period (while 74% would vote for a ban in a referendum). Support drops significantly for alternatives e.g. a ban on gambling on greyhound racing (42%), or a requirement for straight tracks (36%).²⁰

What is the policy problem or opportunity?

40. When a previous Minister for Racing, Hon Grant Robertson announced the Government was putting the industry on notice in September 2021, he gave the industry until the end of 2022 to address concerns prior to decisions being made regarding the future of the industry. The following Minister did not make a decision, however declared that the status quo was not an

¹⁷ SPCA point to GRNZ's decision in 2020 to stop reporting progress against the Hansen Report's recommendation to the Government, declaring all recommendations had been "successfully implemented," while National Animal Welfare Advisory Committee (NAWAC) expressed concerns that GRNZ had provided insufficient information to support this, as an example of this.

¹⁸ Note that SPCA was removed from the industry's animal health and welfare committee in March 2022.

¹⁹ Dogs in the rehoming system are assessed as 'red' when they need extra behaviour training before being rehomed. According to GRNZ, 5.49% (30) dogs have been assessed as red in the 2022/23 season.

²⁰ <https://pmc.ncbi.nlm.nih.gov/articles/PMC10812617/pdf/animals-14-00207.pdf>

option, “we are faced with two options: continue under strict conditions or closure.”²¹ ²² A decision has not been made. In June 2024, the Minister for Racing, Rt Hon Winston Peters told the Governance and Administration Select Committee he was still waiting on all the facts to make a decision on the future of the greyhound racing industry.²³

41. The problem to be addressed is to make a decision that provides certainty on the future of the greyhound racing industry in New Zealand. Namely, whether or not the New Zealand greyhound racing industry should continue, and if so, under current or amended legislative settings.
42. Clarity is needed to give industry participants; the wider racing industry, stakeholders and the New Zealand public certainty to move forward.
43. As noted by GRNZ in an October 2024 media release, “*The uncertainty of being under review for the last three years has undermined industry confidence, adversely affected the mental well being of our participants and impacted on investment decisions required across all areas of the sport*”.
44. In their July 2024 quarterly report, they stated that “*GRNZ and the wider greyhound industry have made significant changes since the 2021 Robertson Review, and have put animal welfare at the forefront of all of our activities. Concerns raised in previous reports have been addressed, with greyhound racing leading the way in the racing industry in New Zealand with many of its welfare programmes*”.²⁴
45. The SPCA has also been public in their need for a decision: “*The time for a decision on the future of the industry is now. We cannot continue with the repeated cycle of exposes and damning industry reviews. Greyhounds deserve better.*”²⁵
46. The greyhound industry is the direct source of employment for 1,054 people and is responsible for over \$159.2M in value-added contribution to the New Zealand economy.²⁶ GRNZ’s 2023 Annual Report states that TAB NZ’s total turnover from greyhound racing last year was \$361M (representing 14.2% of its domestic turnover and 23.3% of its overseas turnover).

Assumptions, risks and uncertainties and constraints

Assumptions

47. Our assumptions are:
 - **Implementation options will not affect overall analysis** - For the purpose of this RIS, Options Two and Three are each being considered as high-level options each featuring a combined package of implementation measures. The Department’s best consideration at this time supports the assumption that either option could be implemented without affecting the overall comparative analysis contained in this RIS and that generally later changes to aspects of either of these packages would not affect the overall analysis contained in this RIS.
48. In addition to the above, there are other specific assumptions applying to individual options. These are highlighted in the discussion about those options.

Risks and uncertainties

²¹ <https://www.beehive.govt.nz/release/tab-partnership-helps-secure-future-racing-industry>

²² The following Minister for Racing, Hon Kieran McAnulty, received a report from the RIB in December 2022, and a supplementary report in March 2023, these were publicly released in May 2023. The Minister delayed stakeholder engagement for greyhound racing, and the release of these reports, citing his role as the Minister for Emergency Management in responding to the extreme weather events earlier in the year, as delaying actions on greyhound racing. The Minister stated due to this delay, he had run out of time to bring a decision before Cabinet before the election.

²³ <https://www.nz.co.nz/news/political/519856/dogs-love-racing-winston-peters-won-t-rush-decision-on-greyhound-racing-ban>

²⁴ <https://www.grnz.co.nz/Files/Quarterly%20Reports/GRNZ%20July%202024%20Quarterly%20Report%20-%20Final.pdf>

²⁵ <https://www.sPCA.nz/news-and-events/news-article/greyhounds-open-letter>

²⁶ Size and Scope of the New Zealand Racing Industry, IER https://nztr.co.nz/sites/nztrindustry/files/2024-05/Size%20and%20Scope%20of%20NZ%20Racing%2022-23_Draft%20Report%202024%20%28HR%29_0.pdf

49. Specific risks and uncertainties applying to individual options are highlighted in the discussion about those options.

Constraints

50. To give certainty to the industry, the Government's direction is to take urgent Cabinet decisions on the future of the greyhound racing industry before 31 December 2024.
51. There has not been in-depth engagement on the details of any hypothetical implementation packages for these options given the sensitive nature of this issue. This is in part to mitigate immediate risks to animal welfare, depending on the option chosen. In particular, if there is a decision to ban the industry, there is a heightened risk of otherwise healthy dogs being destroyed if they are no longer profitable. However, the issues have been actively discussed for many years after the industry was put "on notice". We anticipate there are likely to be a range of views on the options.

What objectives are sought in relation to the policy problem?

52. Overall, the objectives sought are:
- **Long term certainty about the future of the industry is provided:** all parties, especially industry participants, but also AWOs and the general public, have certainty about the long future of the greyhound racing industry.
 - **Negative animal welfare outcomes are minimised:** negative greyhound welfare outcomes (eg greyhound deaths and injuries) minimised.
 - **Neutral or positive economic impacts:** supports economic benefits (employment and revenue) for Aotearoa/New Zealand including regional economies and minimises negative economic impacts on industry participants, and the wider racing industry.
53. These objectives in some respects may not align and as outlined later, involve balancing and trade-offs.

Section 2: Deciding upon an option to address the policy problem

54. Relating the objectives, the assessment criteria that will be used to compare are listed below.

Criteria	Specific Aspects / Description
Long term certainty about the future of the industry is provided	Option provides long term certainty about the future of the industry and minimises the risk of future or ongoing Government intervention being needed. Industry participants can make informed decisions about future investment. The public and other key stakeholders have a clear understanding of the future of the industry. Transparency and data recording requirements for industry practices and welfare outcomes can continue*.
Negative animal welfare outcomes are minimised	Option is likely to lead to long term, sustainable overall improvement in animal welfare generally, and specifically: injury and death reductions; healthy kennel conditions; and high rates of rehoming. These are broadly aligned with the six key Greyhound Review focus areas.
Neutral or positive economic impacts	Option supports economic benefits (employment and revenue) for Aotearoa/New Zealand including regional economies. Option minimises negative economic impacts on industry participants, and the wider racing industry.
Implementation can be effective and efficient	Option allows for a smooth transition for any new requirements and/or regulation. Implementation of the proposed option is feasible. Option allows compliance requirements & costs to be minimised/ proportionate to the expected overall benefits. Implementation risks (e.g. capability and capacity issues, animal welfare impacts, and litigation risks) can be mitigated.

*In addition to Animal Welfare these were the two other major areas the Roberston report noted.

55. As noted earlier, greyhound racing has inherent risk, and some level of injury is unavoidable. This demonstrates there is an inherent trade-off between the animal welfare criteria and the economic impact criteria. We also acknowledge that the weighting put on criteria will depend on an individual's values. For example, we recognise for some stakeholders any injury / death rates are unacceptable, regardless of any other considerations.

What scope will options be considered within?

56. This RIS is limited to the wider decision about the future of the greyhound industry. As noted below, options two and three are each being considered as combined package of initiatives based on the Department's best consideration at this time and Ministerial preferences. Each of these have some scope assumptions which are listed against them.

What options are being considered?

57. Three options have been considered:

- **Option One: Counterfactual – Industry Continuation under Status Quo Legislative Settings (i.e. no law changes)**
- **Option Two: Industry continuation with increased oversight and regulation**
- **Option Three: Industry Closure**

58. For the purpose of this RIS, Options Two and Three are each being considered as high-level options. The Department's best consideration at this time supports the assumption that either option could be implemented without affecting the overall comparative analysis contained in this RIS.

59. Legislative change would be required should Cabinet choose to close the industry. Continuing the industry under more oversight would also require changes to the Racing Act. The expectation is that there will be specific RISs at that time.

Stakeholder Views

60. The public and stakeholders were not consulted on the options. However, the issue of the greyhound racing industry's social licence has been actively discussed by government and stakeholders for many years.
61. We anticipate from conversations with stakeholders, there are likely to be a range of views on the options. AWOs are likely to support the closure option, or the increased oversight and regulation option. GRNZ and industry participants would likely support the status quo.

Option One – Counterfactual - Industry Continuation under Status Quo Legislative Settings (i.e. no law changes)

62. With this option, the Department would look at whether any improvements can be made without amending the current racing laws. However, as noted, the Racing Act is predicated on the racing codes largely being self-governing and therefore provides very limited levers for the Minister. Our initial assessment is that regulation making powers will not extend to further regulation opportunities for animal welfare outcomes²⁷.
63. Another initiative would be to publicly keep the industry 'on notice'. This would involve another assessment of progress before a decision is made in coming years. However, this would only perpetuate the ongoing uncertainty, so it is not recommended.

Stakeholder Views

64. This option would likely be unpopular with AWOs who have continued to publicly call for a ban on greyhound racing, and are of the view that sufficient meaningful improvement across the areas of concern has not occurred. The SPCA have also expressed concerns that there is no oversight of RIB role in this area.
65. Keeping the industry on notice, is also likely to be unpopular with AWOs, who see the industry as already having had enough chances. It would also be unpopular with GRNZ and industry participants as the continued uncertainty would continue to have negative effects (e.g. lack of investment in tracks, members leaving the industry, adverse mental wellbeing).
66. A number of AWOs are of the view that the experience from earlier reviews on greyhound racing has shown that GRNZ quickly retracts from progress and slips back into old ways of operating when it is not under review.²⁸

Assessment against objective

67. Under this option, we would expect GRNZ and RIB to continue working as they have been. This includes continued reporting against welfare target KPIs aimed at reducing injuries and deaths. The RIB noted GRNZ met three of its ten KPI targets for the 2023/24 racing season and have substantively achieved another three.
68. Under the counterfactual, we have made the assumption that GRNZ would meet their recently revised injury reduction targets, thereby decreasing injuries. It is RIB's opinion that the revised targets are more realistic and achievable.

²⁷ Should the Status Quo be preferred, we would also work with Ministry for Primary industries (MPI) to provide further advice about any possibilities under AW Act (e.g if a Code of Welfare could be developed specific to greyhounds).

²⁸ The SPCA have pointed to GRNZ's 2020 decision to stop reporting against the Hansen Report to the Government, declaring all recommendations had been "successfully implemented", while the National Animal Welfare Advisory Committee expressed concerns that GRNZ had provided insufficient information to support this, as evidence of this.

69. Even if there are changes in approach and improvements to KPIs, there will always be some level of injuries in greyhound racing. The level of injuries/deaths which are deemed to be socially 'acceptable' would vary from stakeholder to stakeholder. This is the same as for any other animal racing industry.
70. Under the counterfactual, GRNZ would still be responsible for making its own animal welfare rules. This would not be satisfactory to AWOs who want greater independent oversight of GRNZ. AWOs have the view that embedding change has not always been effective, with past instances of poor patterns of behaviour returning to the industry as soon as oversight has been reduced when review periods have concluded.
71. The counterfactual is unlikely to address all concerns hence the long-term future of the industry would remain uncertain. The following quote from Bruce Robertson's 2021 report reflects how this option is likely to play out:

If the decision is made to continue the industry as it currently stands, stakeholder pressure would remain and likely to grow in frustration from both animal welfare organisations who believe the industry has been given enough chances to prove they care about animal welfare outcomes as well as greyhound racing participants who feel that their social license should be secured to enable them to better their investment into infrastructure that aids their animal welfare efforts.

Option Two – Industry continuation with increased oversight and regulation

High level approach

72. The industry continuation with increased oversight and regulation option, could include the following as possible legislative interventions:
- a 'minimum intervention package': changes to racing rule-making and strengthened legal requirements; and
 - putting 'backstop' powers in the Racing Act if stronger interventions are needed at a later date. (for example, changes to GRNZ governance, or requiring greater use of straight tracks)
73. Many specific animal welfare requirements are most appropriately dealt with by giving greater rule-making powers to a regulator rather than being specifically put in the Racing Act. Giving another body greater powers to set rules would help address AWO concerns that the industry will revert back to type and lose focus on animal welfare once the industry has less public attention.

Assumptions for Option Two

74. Depending upon the direction chosen, there would be differing objectives for consideration in future RIAs. **In an industry continuation scenario:** the objective would be that the animal welfare of racing industry greyhounds improves, that these improvements are sustained in the long-term, and overall trust in the industry improves.
75. We have made the following assumptions in our analysis:
- **Interventions are to be within the Racing Act²⁹:** The 2020 reforms have been successful, and it is preferable to keep any interventions minimal enough to address concerns while not risking the overall benefits of the devolved industry governance approach the reforms are based on. In addition, as this issue needs racing specific interventions, any interactions with

²⁹ Means devolved approach maintained as much as possible; creation of new organisations limited. Ministerial involvement limited -regulatory powers are to be used as backstop only

the AW Act are best be done under its general framework, not via bespoke legislation.³⁰ This would also potentially allow for quicker implementation.

- **Any costs for additional regulation are to be paid by industry:** Currently all the RIB's regulatory costs are paid for by the industry via TAB NZ. Our expectation is that the Government would want the industry self-funding approach (including costs for additional regulation or closure) to continue.
- **Wider racing impacts are to be minimised:** We assume that at this stage any changes will only be applied to greyhounds. Should there be any consideration of extended to changes to the equine codes this would be subject to further regulatory impact analysis.
- **Continued animal welfare improvements:** For the purposes of this analysis we are assuming that GRNZ and RIB will continue reporting against welfare KPIs aimed at reducing injuries and deaths, and that they would continue to improve and meet KPI targets.

Stakeholder Views

76. We have not consulted stakeholders on this specific option. We note generally that GRNZ has indicated it would support increased regulation, and it has a preference that RIB should not be given enhanced regulatory powers. The RIB has indicated it wishes to have a greater rule making ability.
77. As outlined, AWOs have concerns about GRNZ making its own rule so would likely be supportive of this, however, some AWOs would likely be of the opinion that this option does not go far enough to address animal welfare and/or the RIB is still too close to the racing industry.

Assessment against objective

78. A Government decision for Option Two would bring certainty to the industry, but would likely be unwelcomed by AWOs.
79. Broadly, this option would provide for only slightly better 'tangible' animal welfare outcomes to the counterfactual, but the changes to regulatory oversight in the legislation would improve industry transparency and better address the (real or perceived) risk of the industry going backwards in terms of animal welfare compared to the counterfactual.
80. RIB's opinion provided to the Department states that "*greyhound injury rates would be unlikely to significantly reduce because of a change in the responsibilities for governance or regulation of animal welfare, integrity and participant licensing for the sport of greyhound racing, were that to occur.*" This is largely based on the fact that injury rates in New Zealand are currently comparable to those in Australian jurisdictions who have more regulatory oversight similar to what is being proposed.
81. As with the counterfactual option, even if there are changes in approach and improvements to KPIs, there will always be some level of injuries in greyhound racing. The level of injuries/deaths which are deemed to be socially 'acceptable' would vary from stakeholder to stakeholder. This is the same as for any other animal racing industry.
82. This option would address some AWO concerns about wanting greater transparency and independent oversight of GRNZ and that poor patterns of behaviour will return to the industry as soon as oversight has been reduced. Giving the RIB greater powers would strengthen its primary regulator function and allow for more racing rule specialisation. It could be done via changes to the Racing Act without needing substantive changes to AW Act and would also clearly allow for costs to be borne by the industry.

³⁰ This rules out for instance giving additional powers for Minister of Animal Welfare under the AW Act to issue greyhound racing specific regulations via an omnibus bill

83. However, it would not fully address some concerns of some AWOS around transparency and lack of input from AWOs in rule making and that a new governance structure should include independent animal welfare representation.
84. This option would however still allow the industry to continue with the associated economic benefits it brings.

Option Three – Industry Closure

High level approach

85. The high-level suggested approach to industry closure would be establishing a Ministerial Advisory Committee (MAC) to ensure an appropriate level of oversight for the closure is in place, and a two phase legislative approach consisting of:
- **Phase one:** an urgent first Bill is progressed to make it an offence to euthanise a racing dog without veterinary agreement that it is required for genuine purposes (i.e. not just because they are no longer racing); and
 - **Phase two:** a second substantive Bill following a considered, MAC informed, policy process and a longer more robust legislative process to formally close the industry, supported by industry transition planning.
86. Following the second Bill passing, the actual operational closure would occur, although realistically the industry will start to wind down when a public announcement is made.

Assumptions for Option Three – Industry Closure

87. If Cabinet decides the industry should be closed, the implications for dogs, industry participants, the wider racing industry, and potentially some local economies will need to be carefully considered. The RIB's March 2023 supplementary report (the March Report) noted the overarching objectives in any closure are to:
- minimise any negative impact on the welfare of greyhounds and
 - to support licenced persons and stakeholders through the closure process.
88. It also provides an outline for a proposed business strategy should the industry be closed. The report identifies nine areas, which are: Governance and Leadership; Legal/law changes; Animal Welfare; People; Racing; Facilities/tracks; Finance; Monitoring; and Engagement. It is assumed that any planning by the MAC, Department or industry would build upon these objectives and plan.
89. In addition, there are some other assumptions built into this closure scenario:
- *Timing* - It is assumed the closure would occur over a 18-20 month period.
 - *Scope* - We anticipate that, in principle, the Government's preferred approach in a closure scenario would be to limit any wider economic impacts to greyhound racing. On this basis, we assume a closure would encompass domestic New Zealand commercial greyhound racing activity itself (and not wider activities e.g. betting on overseas races)³¹. Breeding would still be legal but likely to reduce significantly off over time. Australia would continue to breed themselves to support their own industry. However, exports are already extremely low. According to GRNZ's 2023 annual report, between 2020/21 and 2022/23, no greyhounds born in those seasons were exported from New Zealand.³²

³¹ This would allow TAB NZ to still receive the proceeds from on overseas greyhound races, which we understand is worth 9(2)(f)(iv) Without a domestic greyhound industry, this money could be otherwise channelled into the other racing codes, initiatives such as harm reduction and animal welfare, and as outlined above, costs associated with industry closure. Amateur racing would still remain legal but these events are limited and not the core cause of animal welfare concerns.

³² <https://www.grnz.co.nz/Files/Advisories/GRNZ%20Annual%20Report%202023%20FINAL.pdf>

- *Costs/Funding* - We assume that the Government's preferred funding approach would be that any impacts to the Crown are minimised and that the industry pays most of these costs during a transition period³³ via redirecting of TAB NZ profits from betting on overseas greyhound. We would expect the MAC to provide advice on matters that would influence overall costs and how this money is most appropriately spent in a closure scenario.

Stakeholder Views

90. Overall, this option would likely be most favourable to AWOs, some of which have been calling for the closure of the greyhound racing industry for many years. They are likely to have specific comments on the detailed aspects of the proposal specific to animal welfare and rehoming.
91. A poll commissioned by the SPCA in 2022 showed that 74% of New Zealanders would vote to ban greyhound racing in a referendum.³⁴ There have also been three major petitions from Aaron Cross - spokesperson for the Greyhound Protection League in 2013, 2018 and 2022 calling for a ban, with the most recent receiving 38,631 signatures.
92. Of course, those in the greyhound racing industry would strongly oppose this option which would have an impact on the livelihoods of those involved. By nature, there will be job losses and loss of income streams.

Assessment against objective

93. A Government decision for Option Three would bring certainty (first criterion) to the industry, but it is likely to be an unwelcome certainty for the industry.
94. Ultimately, there will always be injuries in greyhound racing given its inherent risk. By virtue of this, closing the industry would lead to long term, sustainable overall improvement in animal welfare generally, and specifically: injury and death reduced to zero. This is the same as for any other animal racing industry.
95. However, the impacts of closing this industry would be significant. The industry supports 1,054 people and adds \$159M value added to the economy. A closure of the industry would have a dramatic impact, not only on individual's livelihoods, but their mental health as well. Some individuals may be more resilient than others, so it is difficult to say what the real impacts would be.

³³ Other options include working with and/or requiring GRNZ to use its funds to support closure

³⁴ Cross-Sectional Survey of Public Perception of Commercial Greyhound Racing in New Zealand <https://www.mdpi.com/2076-2615/14/2/207>

How do the overall options compare to the status quo/counterfactual?

	Option One – <i>Counterfactual</i> – Industry Continuation under Status Quo Legislative Settings (i.e. no law changes)	Option Two - Industry continuation with increased oversight and regulation	Option Three – Industry Closure
Long term certainty about the future of the industry is provided	0 Questions about the long-term future of industry would likely remain in light of no changes to regulatory oversight. Disincentives for investment in tracks/facilities would likely remain.	+ (+) Active Government announcement followed by reforms would give certainty to the long term future of the industry. Increased RIB oversight and rulemaking would address stakeholder concerns about the industry 'making their own rules' etc Assurance would provide incentive for investments.	++ A Government decision for closure would bring certainty to the industry (but it would be unwelcomed by it).
Negative animal welfare outcomes are minimised	0 Welfare improvements likely to be along lines of GRNZs current and or projected KPI levels.	0/+ Increased oversight and regulation likely to result in similar or slightly better animal welfare KPIs (but as noted, would address other related transparency and governance concerns).	++ The best long-term option for animal outcomes because without racing, there will be no adverse animal impact (as is true of other racing activities). Provisions in transition period to support immediate animal welfare concerns and rehoming. Increased oversight during closure via additional monitoring by the RIB and MAC.
Neutral or positive economic impacts	0 Would provide industry with some assurance that they will continue by no longer being 'on notice' but, as noted above, questions would likely remain which may hinder benefits realised.	++ Industry would continue with the economic benefits it brings. Long term assurance would allow for more investment and potentially bigger impact. Some additional costs of RIB to be borne by industry.	-- Long term loss of economic impact on the industry. Licensed persons would be supported through the process, but impacts would still be significant for those affected.
Implementation can be effective and efficient	0 No addition implementation necessarily required.	+ Would require legislation. Likely to be higher compliance costs but more effective oversight by the RIB of the industry.	+ Would require legislation. Oversight of closure undertaken by MAC accompanied by additional monitoring by the RIB.
Overall assessment	0	+ (+) Refer to discussion in next section.	+ (+) Refer to discussion in next section.

Key for qualitative judgements:	
++	much better than doing nothing/the status quo/counterfactual
+	better than doing nothing/the status quo/counterfactual
0	about the same as doing nothing/the status quo/counterfactual
-	worse than doing nothing/the status quo/counterfactual
--	much worse than doing nothing/the status quo/counterfactual

What option is likely to best address the problem, meet the policy objectives and deliver the highest net benefits?

The Counterfactual is not a viable option

96. We do not consider the counterfactual to be a viable option as it would not address concerns around the animal welfare oversight of the industry. It would miss the opportunities for operational improvements to current arrangements, and not allay concerns emphasised by AWOs that the industry will not continue to progress once the oversight of the review period has concluded.³⁵ The counterfactual is unlikely to address all concerns, hence the long term future of the industry would remain uncertain.

Both Options Two and Three are viable, however, the preferred option depends on the weighting given to the criteria – animal welfare versus economic impact

97. As noted, both Options Two and Three are viable and they would give certainty to the industry. A Government decision for Option Two would bring certainty to the industry, but would likely be unwelcomed by AWOs. A decision for Option Three would also bring certainty to the industry, but it would be unwelcomed by it.
98. This is a finely balanced decision which will depend on the weight that the decision maker places on different elements involved, including animal welfare and wider economic impact of the greyhound racing industry.

Option Two - Industry continuation with increased oversight and regulation

99. Option Two is preferred if greater weighting is given to the economic contribution of the industry. As noted broadly, this option would provide for slightly better ‘tangible’ animal welfare outcomes to the counterfactual, but the changes to rule making functions in the legislation would improve industry transparency and better address the (real or perceived) risk of the industry going backwards in terms of animal welfare compared to the counterfactual.
100. While other changes to legal requirements outlined in section 3 of this RIS would effectively be codifying current practice, they would address some AWO concerns around enforcement, mismatches between requirements under the AW Act and the Racing Act and that there is no external oversight of RIB. They may also present opportunities for operational improvements to the current arrangements. This option would also help to address concerns raised on transparency, oversight and independence.
101. While any of the additional interventions in this option outlined in section 3 will likely result in slightly improved animal welfare outcomes, we have not undertaken detailed analysis of the specific impacts on each of them. This means that there is a risk of unintentional disproportional impacts. Each measure would also be a significant departure from current arrangements and the underlying rationale of the Racing Act, which is based on devolution. In addition:
- any governance interventions would be a significant departure from current arrangements as racing codes are effectively private organisations; and
 - requiring greater use of straight tracks and/or the use of a population management in setting the meetings for a year could result in a significant reduction of the industry racing profile with potentially big financial impacts which would lead to industry rationalisation/downsizing.
102. Placing these measures as reserve backstop power in the Racing Act is the most appropriate course of action. This would allow a phased approach of first establishing the rule making changes then assessing if any additional further measures are needed at a later stage. This

³⁵ The SPCA point to GRNZ’s 2020 decision to stop reporting progress against the Hansen Report to the Government, declaring all recommendations had been “successfully implemented”, while National Animal Welfare Advisory Committee (NAWAC) expressed concerns that GRNZ had provided insufficient information to support this, as evidence of this.

would provide the industry incentive to continue to improve. It is assumed there would be a test or threshold in the legislation to ensure these powers were only used if needed and are proportional. Having a backstop reserve power is consistent with the general approach throughout the Racing Act and would remove the need for a later Bill.

103. This option would allow the industry, with its economic and employment benefits, to continue.

Option Three – Closure

104. Option Three is preferred if greater weighting is given to animal welfare compared to the economic contribution of the industry. Despite GRNZ results in improving animal welfare outcomes, as evidenced by the RIB's latest reports (especially relating to the factors within GRNZ's control), animal welfare outcomes are currently not acceptable and will not improve enough under the counterfactual or a new regulatory system to retain a social licence.
105. In terms of animal welfare, this option would have in the long term the most positive impacts compared to the status quo by virtue of the fact that if there is no greyhound racing industry, there would be no negative impacts on greyhounds as a result of racing. This is the same as for any other animal racing industry. To support animal welfare in the transition period, the urgent bill proposed under phase one of this option would make it an offence to euthanise a greyhound without veterinary approval if it is for genuine purposes (i.e. not just because they are no longer racing).
106. However, this option would have the greatest negative impact on the industry. The industry supports 1,054 people and adds \$159M value added to the economy. The closure of the industry will have an impact on the livelihoods of those involved. By nature, there will be job losses and losses of income streams. A closure of the industry would have a dramatic impact, not only on individuals' livelihoods, but their mental health as well. Some individuals may be more resilient than others, so it is difficult to say what the real impacts would be. Under this option it is envisaged the MAC would have a role in providing advice around required support for licenced persons and stakeholders through the closure process.

What are the marginal costs and benefits of the option?

107. As outlined earlier we consider that depending on the weighting of the different objective/criteria both continuation with greater oversight and regulation (Option Two) and closure (Option Three) could be viable options. As such we have outlined marginal costs and benefits of both options below. Also note that costs will vary according to implementation details yet to be decided.

Continuation with greater oversight and regulation (Option Two)

Affected groups	Comment	Impact	Evidence Certainty
Additional costs of the option compared to taking no action			
GRNZ NZ	Additional scrutiny/rules/audits on industry via RIB	Low/Medium – will be more than status quo.	Medium
Industry participants	Additional scrutiny/rules/audits on industry via RIB	Low/Medium – will be more than status quo.	Medium
Wider industry/TAB NZ	RIB costs (paid for by industry via TAB)	<p>Figures from RIB showing costs above current budget for additional responsibilities/powers.</p> <p>9(2)(f)(v)</p> <p>[REDACTED]</p> <p>9(2)(f)(iv)</p> <p>[REDACTED]</p>	Medium/ High
RIB	Note – costs paid by industry above. Increased work program compared to status quo.	Medium – Increased work program compared to status quo (licensing application process, review of animal welfare standards).	Medium/ High
Total monetised costs	RIB costs	<p>9(2)(f)(iv)</p> <p>[REDACTED]</p> <p>[REDACTED]</p>	Medium

Non-monetised costs		Increased workload/scrutiny for industry and RIB.	Medium
Additional benefits of the option compared to taking no action			
GRNZ NZ	<p>More certainty provided on the future of the industry.</p> <p>Assurance would provide incentive for investments in tracks, infrastructure, etc.</p>	<p>Medium – would provide certainty and relief. Financial benefits likely to continue at a similar level. Economic benefits of the industry include 1,054 total full time equivalent (FTE) jobs supported by the industry. The industry contributes over \$159.2M to the New Zealand economy.</p> <p>Medium – continuation/strengthening of social elements of industry community.</p>	Medium
Industry participants	<p>More certainty provided on the future of the industry. Industry would continue.</p>	<p>Medium – would provide certainty and relief. Financial benefits likely to continue at a similar level.</p>	Medium
Wider industry/TAB NZ	<p>More certainty provided on the future of the industry.</p>	<p>Medium – would provide certainty and relief. Financial benefits likely to continue at a similar level.</p> <p>GRNZ's 2023 Annual Report states that TAB NZ's total turnover from greyhound racing was \$361M (representing 14.2% of its domestic turnover and 23.3% of its overseas turnover).</p>	Medium
Greyhound organisations/SPCA/A WOs	<p>More certainty provided on the future of the industry.</p> <p>Additional assurance by having independent animal welfare representation/rules/policy/standards, continuation of animal</p>	<p>Low/Medium – assurance, but some wider concerns on animal welfare likely to remain.</p>	Medium

	welfare audit program as well as addressing concerns around transparency and lack of input from AWOs.		
Total monetised benefits	Economic benefits of the industry continue.	The industry contributes over \$159.2M to the New Zealand economy.	Medium
Non-monetised benefits	More certainty provided on the future of the industry.	1,054 total full time equivalent (FTE) jobs supported by the industry.	Medium

Closure (Option Three)

Affected groups	Comment	Impact	Evidence Certainty
Additional costs of the option compared to taking no action			
GRNZ NZ	Closure – eventual wind-down of industry	High – job and revenue loss.	High
Industry participants	Closure – eventual wind-down of industry	High – overall economic costs with the loss of the industry and cost to participants. 1,054 total full time equivalent (FTE) jobs supported by the industry. The industry contributes over \$159.2M to the New Zealand economy.	High
Wider Racing industry/TAB NZ	Rehoming costs	9(2)(f)(iv) [REDACTED]	Medium
	RIB costs (paid for by industry via TAB)	9(2)(f)(iv) [REDACTED]	High
Greyhound organisations/ SPCA/AWOs	Rehoming costs	High – paid by industry (see above).	High
RIB	RIB costs (paid for by industry via TAB)	Note – costs paid by industry above.	High

³⁶ If the closure is limited to domestic greyhound racing, TAB NZ would still receive the proceeds from overseas greyhound races which we understand is worth 9(2)(f)(iv) [REDACTED]. This could be channelled into the industry costs associated with closure.

9 [REDACTED]
 ([REDACTED]
 2 [REDACTED]
) [REDACTED]

Crown	MAC	9(2)(f)(iv)	High
	Loss of tax	High – loss of tax collected from greyhound racing.	Low/Medium
	Industry support	High – industry participants will likely require/request varying degrees of financial compensation or support for earning and employment loss.	Medium
Racing industry (and sporting codes)	Reduced distributions	High – GRNZ’s 2023 Annual Report states that TAB NZ’s total turnover from greyhound racing was \$361M (representing 14.2% of its domestic turnover and 23.3% of its overseas turnover).	High
		However, TAB NZ would be able to continue taking bets on offshore greyhound races 9(2)(f)(iv)	Medium
Total monetised costs		9(2)(f)(iv) Loss in industry contribution – about \$159.2M to the New Zealand economy per annum. Loss of tax collected.	High
Non-monetised costs		Negative impacts on industry participants (mental wellbeing and loss of social elements of industry community)	Medium
Additional benefits of the option compared to taking no action			
GRNZ NZ		n/a	High
Industry Participants		n/a	High
Wider Industry /TAB NZ		n/a	High
Greyhound organisations/ SPCA/AWOs		High – benefits to animal welfare under this option.	High
Total monetised benefits		No monetary benefits	High
Non-monetised benefits		Animal welfare	High

Section 3: Delivering an option

How will the new arrangements be implemented?

If continuation with greater oversight and regulation (Option Two) is the preferred option

108. Should the preferred approach be industry continuation with increased oversight and regulation, then we anticipate the following as possible legislative interventions:
- a 'minimum intervention package': changes to racing rule-making and strengthened legal requirements; and
 - putting 'backstop' powers in the Racing Act if stronger interventions are needed at a later date.
109. Implementation details would be covered in primary and secondary regulations. More detail on the implementation will be included in a subsequent RIS.

Minimum interventions - racing rule-making improvements and strengthened legal requirements

110. Many specific animal welfare requirements are most appropriately dealt with by giving greater rule-making powers to a regulator rather than being specifically put in the Racing Act. Giving another body greater powers to set rules would help address AWO concerns that the industry will revert back and lose focus on animal welfare once the industry has less public attention.
111. While there are different options for a new rule-making structure/entity, on balance we consider that the RIB is preferable. The RIB would retain its powers under the Racing Act to enforce the racing rules. The specific new powers RIB could have include:
- setting KPIs– including a process for which groups (e.g. SPCA) should be involved;
 - specifying greyhound welfare rules requirements;
 - specifying the animal welfare strategies and policies that GRNZ must comply with; and
 - a backstop power to be able to close a track on animal welfare grounds and require an improvement plan before it reopens.
112. In addition, a number of new requirements could be placed in the Racing Act to reinforce the importance of animal welfare.
- requiring that Codes must consider animal welfare when exercising their functions;
 - requiring that any animal welfare racing rules are comparable to/at least as stringent as any rules or codes of practice under the AW Act; and
 - codifying the monitoring/enforcement roles of RIB/MPI/SPCA based on the current Memorandum of Understanding between them.

Other additional interventions that as backup powers

113. 'Backstop' powers could be included in the Racing Act. These could include:³⁸
- wider regulation making powers for animal welfare requirements;
 - changes to the current code/GRNZ operating model: establishing a new oversight committee involving AWOs and the transfer of participant licencing functions to the RIB;
 - changes to GRNZ governance: including more specification about the required GRNZ Board makeup (e.g. more independent representatives and/or animal welfare expertise), and/or having some direct Ministerial appointments on the Board;

³⁸ Other discounted options included replacing the GRNZ board with a fully appointed board and GRNZ being issued (revokable) licence to operate by the Minister based on achievement of animal welfare outcomes.

- imposing specific constraints: requiring use of straight tracks³⁹, and/or the use of a population management model/rehoming projections in setting the meetings for a year.
114. This would allow a phased approach of establishing the rule-making changes, then assessing if further measures are needed at a later stage. Having ‘backstop’ powers is consistent with the general approach of the Racing Act and would remove the need for later legislative change. Backstop powers would provide potential incentive effects for industry continued improvement and compliance with “minimum intervention” requirements.
115. Backstop powers would impose additional costs on industry and potentially enforcement.

If closure (Option Three) is preferred

116. As noted to manage a closure period carefully, it is envisaged the Government would establish, appoint and fund a MAC and temporarily ban the killing of greyhounds connected to the greyhound racing industry without authorised veterinary permission. This would be followed by a second more substantive Bill.
117. A MAC would be established to ensure an appropriate level of independent oversight for the closure. The MAC would:
- advise on the animal welfare implications and the transition period through to closure;
 - advise on necessary support for licenced persons and stakeholders through the closure process;
 - work alongside the industry to finalise a transition plan towards closure; and
 - feed into the content of the second Bill that would legislate the details of the closure.
118. A supplementary report was provided by the RIB in March 2023 that provided an outline for a proposed business strategy should the industry be closed.⁴⁰ It is expected that the MAC would use this as a basis for its work.
119. To best protect animal welfare and support affected persons, it is proposed that the temporary ban on unjustified killing of racing dogs be introduced under urgency. Without this urgent legislation, there is a heightened risk of otherwise healthy dogs being destroyed upon announcement of the intention to ban the industry. This is because an incoming ban puts greyhounds at risk of unnecessary euthanasia as they will no longer be viewed as profitable by owners, and penalties under the existing racing rules will no longer be an effective deterrent. While many in the industry will act in good faith in keeping or rehoming, a Bill will ensure the safety of greyhounds in less secure environments
120. Further policy decisions for a second more substantive Bill would be informed by advice from the MAC and would cover the operational closure of greyhound racing, including closure timeframe and scope, rehoming of greyhounds, redirection of TAB NZ funds, any establish any necessary governance group or powers, and identifying a pool of money to facilitate the closure.

How will the new arrangements be monitored, evaluated and reviewed?

If continuation with greater oversight and regulation (Option Two) is preferred

³⁹ **Evidence on effectiveness of straight tracks in minimising injuries is mixed.** Straight tracks are one option that has been suggested to reduce injuries. While there is some logic to this as large number of injuries occur during turns, the potential impacts are still unknown in the New Zealand context as there is only one track in New Zealand and it has only been in place for less than a year. In November 2024, RIB advised that “there is as yet insufficient New Zealand straight track racing data to quantify the welfare benefit through reduced injury rates”. Requiring greater of sole use of straight tracks would also change the nature of the industry by consolidating venues and racing to sprinting dogs and be costly to the industry. This and other additional interventions covered under a continuation scenario would be subject to a further RIS.

⁴⁰ The report identified nine areas, which were governance and leadership, legal/law changes, animal welfare, people, racing, facilities/tracks, finance, monitoring and engagement.

121. RIB and GRNZ would continue to evaluate, monitor and report on progress made. Additional policy work would be conducted to determine if the current KPIs and reporting are adequate, or if additional detail is required.
122. Implementation details would be covered in primary and secondary regulations. More detail on the implementation will be included in a subsequent RIS.

If closure (Option Three) is preferred

123. A MAC is recommended to ensure an appropriate level of oversight for the closure is in place. The MAC would be established to undertake detailed analysis on operational aspects of the closure plan drafted by the Department of Internal Affairs (the Department) and informed by work undertaken by the Racing Integrity Board (RIB) and the SPCA. In carrying out its role of providing oversight of the closure on behalf of the Minister, the Committee will monitor and report on the outcomes of the transition plan. The Committee also will:
 - engage with industry and animal welfare stakeholders and, in particular, work with animal welfare agencies;
 - provide oversight of GRNZ as the closure programme proceeds, as well as other operation matters such as clubs' racing closure activities and track closure decisions/timeframes;
 - provide oversight of the rehoming/adoption pipeline; including ensuring additional adoption and rehoming opportunities are identified and implemented; and
 - ensure processes/practices are established to enable traceability of all greyhounds throughout the closure period.
124. The MAC would monitor and report on the outcomes of the transition plan. This would include a separate closure report once the industry has ceased on the facilitation of the closure and outline any outstanding steps required. They would also provide advice on lessons learned from the process.
125. RIB would require costs above current budget for additional investigations, monitoring and veterinary support during closure.
126. Implementation details would be covered in primary and secondary regulations. More detail on the implementation will be included in a subsequent RIS.

Appendix 1: Further Information on the size and scale of the industry

Dogs	
There are approximately 2,922 greyhounds in the greyhound racing industry. This includes 813 pre-racing; 1,297 racing; 114 retired for breeding; and 698 awaiting rehoming	
A total of 673 greyhounds were adopted from GRNZ in the 2023/24 season, this was an increase of 40% on the 481 adopted in 2022/23, some of this increase due to USA rehoming programme.	
Racing Activity	
<ul style="list-style-type: none"> • 6 Racing clubs • 6 Racetracks • 390 Race meetings • 4800 Total races • 36,487 Total race starts (2022/23 data, no 2023/24 data on starts) 	There are a total of 6 greyhound racing clubs and 6 racing tracks (Auckland, Cambridge, Palmerston North, Whanganui, Christchurch, Southland). In 2023/24 there were approximately 390 race meetings and 4,800 total races.
Participants	
Total FTE workers: 1054 ⁴¹	
<ul style="list-style-type: none"> • Northland – 13 • Auckland – 259 • Bay of Plenty – 26 • Waikato – 85 • Gisborne/Hawkes Bay – 17 • Taranaki/Manawatu-Wanganui – 133 • Wellington – 101 	<ul style="list-style-type: none"> • Tasman-Nelson/Marlborough – 13 • West Coast and Canterbury – 355 • Otago and Southland – 53
<p><u>People directly and indirectly involved:</u></p> <p>Of the 13,632 FTE jobs sustained by the New Zealand racing industry as a whole (greyhound, harness, thoroughbred) around 39% are the direct result of the racing industry activity whilst the remainder are in down-the-line industries that produce and supply goods and services to support racing in New Zealand</p>	<p><u>Greyhound directly involved (not all are FTEs)</u></p> <ul style="list-style-type: none"> • Breeders: 37 • Breeders staff: 11 • Owners: 738 • Trainers :131 • Staff employed by trainers: 79 • Racing club and industry staff: 194 • Staff employed by participants: 90
GRNZ economic contributions	
% of value added to industry	\$159.2M, 8.5%
Wagering	
GRNZ's 2023 Annual Report states that TAB NZ's total turnover from greyhound racing last year was \$361.71M (representing 14.22% of its domestic turnover and 23.29% of its overseas turnover).	

⁴¹ https://nztr.co.nz/sites/nztrindustry/files/2024-05/Size%20and%20Scope%20of%20NZ%20Racing%2022-23_Draft%20Report%202024%20%28HR%29_0.pdf

Appendix 2: Further Information on the RIB and GRNZ YE 2023-24 (Q4) Greyhound Reports

The latest quarterly progress reports received from GRNZ and the RIB covering the 2023/24 racing year are generally consistent and agree on the evaluations of progress made.

GRNZ has reemphasised the need for certainty *'the mental toll that it is taking on everyone involved in the industry is significant. This uncertainty is also undermining industry confidence and impacting investment decisions across all areas of the sport'*.

Overall progress and reporting changes

The RIB notes that in its last May briefing, it reported improved performance against the 15 focus areas since the December 2022 final report, and that 28 of the 75 RIB recommendations were being implemented, and a further 41 were embedded, evaluated or closed.

The RIB has consequently revised its approach to the Greyhound Review monitoring programme and has changed how it reports which includes a new 'dashboard' (Appendix 1 to its report). The new approach continues to review the programme's 15 focus areas, but focuses on 6 key animal welfare areas and the adequacy of GRNZ controls (rules, policies, etc), as well as performance reporting and assessment. We consider this approach will likely be more helpful going forward.

The RIB has informed us that a major reason for this change is to better separate out the factors which GRNZ has direct control over (i.e. the 'controls' such as developing euthanasia rules and enforcing those rules) and the measurements of the outcomes that may be influenced by other factors outside of direct GRNZ control (e.g. a person breaching euthanasia rules, even if they are punished later).

Regarding the factors inside GRNZ's control, the RIBs dashboard indicates that for all 15 work programme areas GRNZ's controls are substantively adequate and align or exceed industry norms and (as relevant) GRNZ is substantively complying with its own rules, policies and standards.

The RIB noted GRNZ met three of its ten KPI targets for the 2023/24 racing season and have substantively achieved another three.

GRNZ has revised its KPIs for the 2024/25 season and updated welfare targets were published in GRNZ's Statement of Intent in July. The RIB has reviewed these and is generally of the view they are more realistic based on GRNZ's performance against KPIs last season. This Statement of Intent includes changes to the injury targets which have decreased from a 17.5% reduction in injuries to a 10% reduction for Category D injuries (injuries incurring stand downs of 22+ days)⁴² and a 17.5% reduction in injuries to a 5% reduction for Category F injuries (stand downs of 43+ days).

Injuries

The RIB notes while there has been considerable effort and focus on identifying and reducing those injuries that are avoidable through veterinary inspections and active management factors such as track preparation, some level of injury is unavoidable with dogs racing together competitively.

The RIB considers that GRNZ's injury controls are adequate, that the level of adherence with established controls is satisfactory, and notes GRNZ has strengthened these controls with the introduction of a Safe Return to Racing Policy in August 2024.

⁴² The previous statement of intent did not single out Category D and Category F KPI's, the previous KPI ahead of the new Statement of Intent was from an October 2023 Quarterly Report

<https://www.grnz.co.nz/Files/Quarterly%20Reports/Final%20GRNZ%20Quarterly%20Report%2031%20July%202023.pdf>

	2020/21 Benchmark	2022/23	KPI Target 2023/24	Final 2023/24
Category D (standdowns of 22 days or more)	7.02 per 1000 starters.	6.33 per 1000 starters 9.8% reduction on benchmark	5.97 per 1000 starters	6.57 per 1000 starters. 6.4% decrease on benchmark
Category F (catastrophic & injuries with 43+ days stand down)	2.40 per 1000 starters.	Category was not split out as KPI at this time*	2.07 per 1000 starters	2.83 per 1000 starters 17.1% above benchmark**

*GRNZ Report notes 'There were 102 such injuries in the benchmark year ... a rate of 2.44 per 1000 starters. In the 2023/24 season, there were 103 such injuries - a rate of 2.86... in the 2022/23 season, there were 73 Category F injuries, at a rate of 2.00.'

**GRNZ Report has figure as 2.86 per 1000 starters and % increase is taken from GRNZ report.

While KPI injury rates increased in the second and third quarters of 2023/24, GRNZ notes the final quarter saw a decrease in injury rates. The RIB acknowledges there will be volatility in injury rates over time and notes GRNZ's results versus comparative Australian states suggest its injury rates are within industry norms.

GRNZ notes while the Category D injuries figure represents a 4.3% increase on the previous season and did not meet its aspirational KPI, it is still 6.4% below benchmark. Regarding Category F injuries, GRNZ note that 'while disappointing, to put GRNZ's results into perspective, our statistics compare favourably in this area to those of some major Australian jurisdictions.'

GRNZ closely monitored injury levels throughout the year and took steps to mitigate these where possible. The Injury Reduction Task Force initiated the Manukau and Addington track closures and created a 'Plan on a Page' of other potential mitigations, including changing the default vacant box for fields of less than eight, (now in place). GRNZ also outlines it made significant investments and changes in 2034/24 including GRNZ taking over employing track curators, replacing lure systems and opening the Wanganui Straight Track.

The RIB has advised that while GRNZ should be doing all they can to reduce injuries, KPI targets are somewhat arbitrary, due to the random nature of injuries and that many causal factors of injury are outside GRNZ's control (e.g. racing interference). The RIB considers it more important that GRNZ report in a statistically meaningful manner using a 12-month rolling mean, benchmark performance against suitable international jurisdictions and ensure they have robust procedures to investigate injuries when they occur, with a particular emphasis on outlier events (i.e. meetings with a higher injury rate than expected).

Following work with Tara Science to identify opportunities to enhance the statistical analysis of injury reporting, the RIB is recommending reporting injury rates as a 12-month rolling average as it will provide a better more sophisticated and meaningful measure (it smooths the variation in previous reporting, and avoids over or underrepresenting underlying performance as a result of short-term variation).

The RIB has undertaken some initial work at looking at how the rolling mean measure would have been reported since 2020/21 Quarter 4. This indicates that Category D injury rates during the 2023/24 season were within the typical range of the preceding years (6-7 per 1,000 starters), but Category F injuries recently increased above the typical range of the preceding years (2.0-2.5 per 1,000 starters). The RIB's analysis of these figures to see if these variations are of statistical significance is to be

undertaken this month as part of its liaison with GRNZ in support of adopting the new measurement. The RIB will provide the Department with the resulting analysis once it is known.

Euthanasia/deaths

The RIB considers that GRNZ's euthanasia controls are adequate and align with or exceed industry norms. The RIB acknowledges the level of adherence with established controls to be satisfactory.

GRNZ's KPI results for the 2023/24 season: one greyhound (1.23%) was euthanised in breach of GRNZ's Euthanasia Policy, achieving the target of < 4%. GRNZ took action against the trainer. During quarter four, there were two race day euthanasias and two greyhounds died following racing (both are included in Category F injuries). There was a total of 13 race day euthanasias and deaths in the 2023/24 season [9 euthanasias and 4 deaths; 0.36 per 1000 starters] - an increase on the 7 euthanasias in 2022/23.

GRNZ notes raceday euthanasias have exponentially decreased in recent years due to a combination of measures it has introduced (e.g. rehoming pathways, Return to Racing support for injured dogs and a new euthanasia policy). GRNZ understands its results compare favourably to other racing jurisdictions across Australia and New Zealand (domestically this would mean compared to the equine codes).

Rehoming

GRNZ notes a record 673 greyhounds were adopted in 2023/24 (an average of 56 per month) which exceeded the KPI target of 525. This is an increase of 40% on the 481 adopted in 2022/23, and while this includes greyhounds rehomed in America (102), the domestic total is also up by 18.7% on last season.

GRNZ's other 2023/24 rehoming KPI results: 43% of greyhounds on the waiting list have been waiting less than 90 days (target 70%) and Great Mates rehoming kennel capacity of 208 (target 210). The RIB considers that GRNZ's rehoming controls are adequate and acknowledges the level of adherence with established controls to be satisfactory at this time.

Appendix 3: Dashboard - status of controls and measures for the 15 Greyhound Review focus areas

Performance Criteria	Controls			Measurements			
	Adequacy	Compliance	Notes	Performance	Validation	Assessment	
Key focus areas	1. Injuries	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	New policy compliance to be advised	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	In line with industry benchmarks
	2. Rehoming	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Policy amendments pending	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Adoptions up 40%, focus needed on waiting list. RIB to begin new validation audit next quarter
	3. Licenced persons and greyhound registrations	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	New focus on location data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Check in rates 99.9% last 6 months. Vax rates 91% (up from 85%)
	4. Standards, rules and policies	<input checked="" type="checkbox"/>	N/A	-	N/A	N/A	Ongoing work to agree and approve Tranche 2 Rules
	5. Euthanasia and deaths	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Policy amendments pending	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Achieved KPI target
	6. Track standards	<input checked="" type="checkbox"/>	N/A	-	<input checked="" type="checkbox"/>	N/A	Straight track racing commenced. Significant remediation projects ongoing
Other focus areas	7. Population management	<input checked="" type="checkbox"/>	N/A	-	N/A	<input type="checkbox"/>	-
	8. Inform and educate the industry	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	LPs required to complete CPD for re-licensing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Achieved KPI target 98.13% CPD
	9. GRNZ information systems	<input checked="" type="checkbox"/>	N/A	-	N/A	N/A	-
	10. Governance	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Governance committees established	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Committees have met as intended
	11. Kennel standards	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Standards in place	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	RIB audit program review underway
	12. Investigate/adjudicate on animal welfare breaches	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	RIB responsibility	N/A	N/A	-
	13. Information management	<input checked="" type="checkbox"/>	N/A	-	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	RIB continues to review and verify data as necessary
	14. GRNZ/RIB engagement	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	-	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Constructive and regular engagement with RIB
	15. Stakeholder engagement	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	-	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	GRNZ provides quarterly public reports and annual accountability documents

Legend

- Adequacy = the RIB considers that GRNZ's rules, policies and standards are substantively adequate and align or exceed industry norms.

- Adequacy** = the RIB considers that GRNZ's rules, policies and standards are substantively inadequate or fail to meet industry norms.
- Compliance** = the RIB considers that GRNZ is substantively complying with its own rules, policies and standards.
- Compliance** = the RIB considers that GRNZ is substantively failing to comply with its own rules, policies and standards.
- Performance** = the RIB considers that GRNZ's performance measurements align with KPIs, industry norms or acceptable practice.
- Performance** = the RIB considers that GRNZ's performance measurements consistently fail to meet with KPIs, industry norms or acceptable practice.
- Validation** = where the RIB has undertaken validation of GRNZ's reported performance metrics.
- Validation** = where the RIB has not undertaken its own validation, but instead relied on GRNZ's performance metrics.

Note: The RIB will not be validating all of GRNZ's reported performance metrics every quarter, but will select samples for validation.

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Appendix 4: GRNZ 2024/25 Welfare Targets (version 13 August 2024) with RIB commentary on change from previous KPIs

Source: <https://racingintegrityboard.org.nz/wp-content/uploads/2024/09/202409-RIB-QUARTER-4-MINISTERIAL-BRIEFING-Greyhound-Review-FINAL.pdf>

Note: The Department understands that GRNZ and RIB were going to discuss modifications to these targets in light of the RIB's suggestions, eg The RIB recommendation that injury rates should be reported as a 12-month rolling average. At the time of writing, the Department does not have copies of any modified KPIs as a result of this work.

	Category	Description	2024/25 Target	2025/26 Target	2026/27 Target	Change from 2023/24 KPI target
1	Euthanasia	Euthanasias outside of GRNZ's Euthanasia Policy	<2% of total euthanasias	<2% of total euthanasias	<2% of total euthanasias	No change.
2	Safety	Reduce the number of Category D injuries as per GA classifications (22+ days). Measured as rate per 1,000 starters against a 2020/21 Benchmark of 7.02	10% reduction (6.32 per 1,000 starters)	12.5% reduction (6.14 per 1,000 starters)	15% reduction (5.97 per 1,000 starters)	Target percentage reduction reduced. The RIB recommends reporting injury rates as a 12month rolling average.
3	Safety	Reduce the number of Category F injuries as per GA classifications (43+ days). Measured as rate per 1,000 starters against a 2020/21 Benchmark of 2.25	5% reduction (2.14 per 1,000 starters)	7.5% reduction (2.08 per 1,000 starters)	10% reduction (2.02 per 1,000 starters)	Target percentage reduction reduced. The RIB recommends reporting injury rates as a 12month rolling average.
4	Safety	Number of races on straight tracks	260	300	350	Target number of races has been decreased.
5	Safety	Percent of total races conducted as Preferred Box Draws (PBD)	65%	70%	70%	No change.
6	Education	Registered persons participate in GRNZ continuous professional development and animal welfare training as a condition of their licence renewal	100%	100%	100%	No change.
7	Traceability	All greyhounds within the industry are subject to at least an annual independent "check-in"	Racing dogs 100% Non racing 98%	Racing dogs 100% Non racing 99%	Racing dogs 100% Non racing 100%	Target number of greyhounds accounted for (annual basis) reduced for non-racing greyhounds. The RIB recommends focus is aimed towards improving compliance

						with the existing traceability rules - ensuring records are accurately maintained regarding a greyhound's location.
8	Rehoming	Retired greyhounds have access to enter the Great Mates rehoming programme in a timely fashion (as measured when they are adopted and leave the GM scheme)	60% within 90 days	70% within 90 days	80% within 90 days	Reduction in the percentage of greyhounds having access to rehoming within 90 days of being placed on the waiting list. Method of assessing this KPI has changed. Previously measured the percentage of greyhounds on the waiting list for <90 days. New measurement assesses access to GM for greyhounds that have been adopted.
9	Rehoming	Increase greyhound adoptions	650	675	700	Target number of adoptions increased.

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