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November 1, 2024

Ministry of Culture, Sports, and Tourism Minister NGUYEN Van Hung 51 Ngo Quyen Street Hoan Kiem District, Hanoi Vietnam

RE: Concerns over the Thien Ma Horse Racing – Madagui Project and greyhound safety and well-being in Vietnam

Dear Minister NGUYEN Van Hung,

My name is Christine Ann Dorchak, and I am one of the founders of <u>GREY2K USA Worldwide</u> (GREY2K). Based in the United States, we are the largest greyhound protection organization in the world. As a non-profit entity, we work to pass stronger greyhound protection laws and end the cruelty of dog racing on both national and international levels. GREY2K also promotes the rescue and adoption of sighthounds across the globe.

I am writing to express our concern over the potential resurgence of greyhound racing projects in Vietnam. More specifically, we understand that local authorities in Vietnam may have issued licenses for the Thien Ma Horse Racing – Madagui Project (in Lam Dong), which would permit the construction of greyhound racing facilities. This decision, if left to stand, would put at risk countless greyhound lives and significantly damage Vietnam's reputation in the international community. It will also likely harm those living in the Lam Dong region given that commercial dog racing provides negligible economic benefit to host communities and is closely linked to criminal activity, including money laundering and illegal gambling. In fact, as a matter of history, greyhound racing was invented by American mobsters who joined with greyhound breeders in the 1920s to create a form of low-level gambling based on the exploitation of dogs.

We are contacting you now as we understand that the Ministry of Culture, Sports, and Tourism may be in a position to regulate the granting of licenses for gambling activities at dog tracks, and as such may be able to reverse any initial decision concerning the Thien Ma Horse Racing – Madagui Project.

Here are some key factors to consider:

• Vietnam is one of nine countries in the world that still legalizes greyhound racing, despite closing its last operational greyhound track last year. In March of 2023, local authorities refused to renew the licensing agreement authorizing commercial greyhound racing in Ba Ria-Vung Tau, which had been operational since 2000, because it did not form part of their socio-economic vision or plan for 2021-2030. Decision makers recognized that the promotion of greyhound gambling would not serve to strengthen Vietnam's general economic welfare, and that it would be best to invest in other projects (e.g., shopping malls, offices, hotels, and so forth). We certainly applaud this forward-thinking analysis.

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- The Thien Ma Horse Racing Madagui Project, in particular, has drawn much criticism from multiple stakeholders, and we believe that there are several warning signs associated with this proposal. For example, multiple Vietnamese newspapers have reported that the individuals associated with the Project previously have breached legal restrictions placed on their use of property (i.e., using agricultural land for other purposes without permission), refused to pay taxes and fines levied upon them by Vietnamese authorities, and engaged in suspect business practices. It would be inappropriate, we feel, to grant these individuals a license to conduct greyhound racing, as violations of animal welfare and safety requirements are almost certain.
- More generally, it is not in Vietnam's broader economic interests to grant licenses that permit greyhound racing and associated betting. Across the globe, commercial greyhound racing is in steep decline. For example, your neighbor China has recently closed its only legal greyhound track. In 2018, the Special Administrative Region of Macau was ordered to cancel the concession of the Canidrome, ending the deaths of 400 imported Australian greyhounds per year and opening up acres of land for more profitable public use. Authorities observed that tax revenue from casinos and other establishments far surpassed government revenue from dog racing and agreed to release all surviving greyhounds to safety in our network. In other countries like the United States, industry records show that between 2001 and 2014 (the last year in which records have been made available), the total amount gambled on American greyhound racing plummeted by 70%; and this downswing has only continued. In fact, the number of US tracks has been reduced from fifty to just two since 2001.
- With respect to the United Kingdom, all of the London dog tracks have closed and are in the process of being repurposed for mixed housing, open space and retail operations. Several countries, including Jamaica in 2009 and South Africa in 2010, refused to legalize dog racing, citing both the poor economics and ethical problems associated with the activity. The global trend is definitely with the greyhounds and follows a love of dogs which truly transcends all cultures.
- It is worth noting that commercial greyhound racing has long been associated with animal cruelty and neglect. Greyhounds are kept confined in small, barren cages and fed a diet based on raw, diseased meat. When brought out to race several times each month, they face the risk of serious injury and death. The most common injuries are broken legs, broken necks, paralysis and seizures. Some greyhounds are even electrocuted when they make contact with the mechanical lure. Those greyhounds that survive are often put down once they are no longer able to race. Drugging greyhounds with cocaine and other illegal substances as a form of race fixing is also commonplace across all jurisdictions. None of this comports with globally accepted principles for the ethical and humane treatment of animals, nor with Vietnam's Law on Animal Health, which explicitly prohibits ill-treatment of animals.

In light of the above, GREY2K respectfully asks that the Ministry of Culture, Sports, and Tourism reconsider its decision to permit commercial dog racing at the Thien Ma Racing – Madagui Project. Certainly, the end of dog racing in Ba Ria-Vung Tau was a positive development, and any relocation or reauthorization would run contrary to the best interests of the Lam Dong region and Vietnam more broadly.

We would be happy to provide more information and appreciate your attention to this timely issue.

Sincerely,

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Christine A. Dorchak, Esq. President and General Counsel