



Department  
for Environment  
Food & Rural Affairs

[www.gov.uk/defra](http://www.gov.uk/defra)

# **Consultation on the initial findings of the Review of the Welfare of Racing Greyhounds Regulations 2010**

**November 2015**



© Crown copyright 2015

You may re-use this information (excluding logos) free of charge in any format or medium, under the terms of the Open Government Licence v.3. To view this licence visit [www.nationalarchives.gov.uk/doc/open-government-licence/version/3/](http://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/) or email [PSI@nationalarchives.gsi.gov.uk](mailto:PSI@nationalarchives.gsi.gov.uk)

This publication is available at [www.gov.uk/government/publications](http://www.gov.uk/government/publications)

Any enquiries regarding this publication should be sent to:

**Defra**

Animal Welfare Team

Area 4B

Nobel House

17 Smith Square, London

SW1P 3JR

Email: [AnimalWelfare.Consultations@defra.gsi.gov.uk](mailto:AnimalWelfare.Consultations@defra.gsi.gov.uk)

## Contents

1. Introduction.....	1
The Welfare of Racing Greyhounds Regulations 2010 .....	1
Size and structure of the industry .....	2
Review of the Regulations.....	2
The Government's Principles of Regulation .....	3
Evidence collected .....	3
Consultation of the initial findings and options for further action .....	4
Responding to this Consultation.....	4
What happens next? .....	5
2. Confidentiality and data protection .....	6
3. Initial findings of the Review .....	7
a) Condition 1: Attendance of a veterinary surgeon .....	7
b) Condition 2: Facilities for the attending veterinary surgeon.....	7
c) Condition 3: Kennels .....	8
d) Condition 4: Identification of greyhounds taking part in races or trials .....	10
e) Condition 5: Record of greyhounds taking part in races or trials.....	12
f) Condition 6: Injury records in relation to races, trials, or sales trials .....	12
g) Guidance.....	14
h) Regulation.....	14
4. Consultation Questions.....	16

# 1. Introduction

The Welfare of Racing Greyhounds Regulations 2010 (the 'Regulations') were introduced following public and parliamentary concern about the welfare of greyhounds at racetracks, particularly 'independent' racetracks, and the fate of greyhounds after they had finished racing. These concerns led to the production of two reports: the Associate Parliamentary Group for Animal Welfare (APGAW) May 2007 'Welfare of Greyhounds' Report and the November 2007 Independent Review of the Greyhound Industry in Great Britain Report by Lord Donoughue of Ashton. Both reports recommended that regulations should be introduced that set a minimum welfare standard at all racetracks, with any industry body undertaking inspections being accredited by the United Kingdom Accreditation Service (UKAS) to do so.

The Regulations came into force on 6 April 2010 and have been in force now for five years. The Government, in line with its commitment to review all new regulations after they have been in force for a period of time, is undertaking a review of their effectiveness. Although the Regulations do not contain the now statutory five year review provision found in all new regulations, this review has been conducted along similar lines to other statutory Post Implementation Reviews (PIRs).

## The Welfare of Racing Greyhounds Regulations 2010

The aim of the Regulations, as stated in the Explanatory Memorandum published alongside the Welfare of Racing Regulations 2010, was to ensure that "all greyhound tracks in England are covered by the same minimum welfare standards and there will be improved traceability of greyhounds".

The Regulations therefore require all greyhound racing tracks in England to meet certain minimum welfare standards. These standards are either enforced by a local authority, via a licence from the local authority, or alternatively by a body which has secured UKAS accreditation in respect of the enforcement of these standards. All tracks must:

- have a veterinary surgeon present at all race meetings and trials; with each greyhound examined by the vet prior to racing or trialling and no greyhound being allowed to run if the vet deems it is unfit to race for any reason;
- ensure that the veterinary surgeon has suitable facilities;
- provide an adequate number of suitably ventilated kennels;
- only allow greyhounds which are microchipped and tattooed (with details on an appropriate national database) to race or trial at the track;
- keep records of all greyhounds who race or trial at the track; and
- keep records of any greyhounds injured at the track.

The Regulations do not cover: conditions at trainers' and breeders' kennels or during transportation, or the retirement or euthanasia of greyhounds. It was stated in the

Explanatory Memorandum to the Regulations that the Government at the time was “satisfied that there is already welfare regulations in place that provide significant protection in these areas.”

## **Size and structure of the industry**

There are currently 29 greyhound racing tracks in England. The sport is divided into two codes – greyhound racing tracks licensed by the industry regulatory body – the Greyhound Board of Great Britain (GBGB), and those tracks which operate outside the industry regulator, commonly referred to as ‘independents’. The majority of tracks in England – 24 – are regulated by the GBGB. The remaining 5 independents are regulated by the local authority in which the track is situated. When the Regulations were introduced in April 2010, there were 33 active greyhound tracks in England, with 26 tracks regulated by the GBGB and 7 independent tracks.

Two of the main functions of the GBGB are to license greyhound tracks, trainers, owners, kennels and officials and to keep a register of owners and all greyhounds racing at tracks licensed by them. No similar body exists that fulfils a similar function for independent tracks.

## **Review of the Regulations**

The Government is committed to regularly reviewing the effectiveness of all regulations that impact on business. All new regulations introduced through secondary legislation must now contain statutory review provisions. Measures that include a statutory review provision must be formally reviewed within five years of the date the measure came into force, and then regularly on a five year cycle. The Welfare of Racing Greyhounds Regulations 2010 predates the requirement to include a statutory review provision. However, Defra still wishes to review the Regulations to establish whether, and to what extent:

- the Regulations have achieved their original objectives;
- the objectives and scope of the Regulations are still valid; and
- regulation is still the best option for achieving those objectives.

This Review is not reviewing whether greyhound racing should be banned. The Government is satisfied that there is nothing inherently cruel about greyhound racing. Neither is this Review a review of the performance of the GBGB in relation to any of its activities that are not directly, or indirectly, covered by the Regulations. Nor is it reviewing the Greyhound Industry as a whole or the funding that underpins its existence.

## The Government's Principles of Regulation

When it comes to introducing new regulations (or extending the scope of existing regulations to cover new areas), the Government has set out its Principles of Regulation. These are:

*The Government will regulate to achieve its policy objectives only:*

- (i) Having demonstrated that satisfactory outcomes cannot be achieved by alternative, self-regulatory, or non-regulatory approaches*
- (ii) Where analysis of the costs and benefits demonstrates that the regulatory approach is superior by a clear margin to alternative, self-regulatory or non-regulatory approaches*
- (iii) Where the regulation and the enforcement framework can be implemented in a fashion which is demonstrably proportionate; accountable; consistent; transparent and targeted.*

*There will be a general presumption that regulation should not impose costs and obligations on business, social enterprises, individuals and community groups unless a robust and compelling case has been made.*

## Evidence collected

To help focus this consultation, Defra has undertaken and commissioned research to gather evidence on the effectiveness of the Regulations and their impact on greyhound welfare. Evidence was collected, in the form of the experiences of relevant stakeholders from across the industry, from track operators and track vets, to re-homing organisations and welfare groups.

Evidence was collected via two strands of research. The first strand involved recruiting a social research company, GfK, to undertake independent qualitative and quantitative research. As part of this research, GfK interviewed, by telephone, 44 people from a variety of backgrounds but all who have some experience of the operation of the Regulations. This research explored participant's views and opinions on how effectively they felt the Regulations are currently working, particularly in relation to the required conditions. The research also explored wider greyhound welfare issues. This research was, by its very nature, investigatory in its approach but has still provided detailed feedback regarding the Regulations. GfK also sought injury and euthanasia figures from tracks.

The second strand of the research entailed Defra undertaking an on-line survey of other interested stakeholders likely to have experience of the Regulations. Some 103 responses were received to this exercise. Results of both strands of research have been collated into one report – which is the main reference document for this consultation –

'Exploring Effectiveness of Racing Greyhounds Legislation (2010)'. The Report represents the initial findings of the review of the Regulations.

While a number of common areas of concern emerged, the report also found that "participants did feel that the regulations positively impacted on the welfare of greyhounds"

## **Consultation of the initial findings and options for further action**

This consultation seeks views on the initial findings of the review as set out in the report.

Based on these findings and subsequent Ministerial discussions with the GBGB, the consultation also sets out possible practicable options for further action to address the issues raised. This consultation stage is an opportunity for anyone to comment on the findings, options and submit any further evidence.

We are not consulting on whether greyhound racing should be banned. The Government does not believe that the problems identified in the initial findings are insurmountable. The Government has no plans to ban greyhound racing. Neither has the government any plans to set up its own statutory regulatory body. Introducing a new body may well require primary legislation and certainly public funding. Due to the relatively small number of tracks and the steps that have already been, and are being, taken by the industry we do not believe that it would be proportionate to introduce a new statutory body and we are not consulting on that as an option in this consultation.

## **Responding to this Consultation**

Reflecting the evidence gathering work that had already been undertaken, this consultation will run for 8 weeks from 6 November 2015 to 31 December 2015

Please respond to this consultation using the Citizen Space consultation system <https://consult.defra.gov.uk/animal-health-and-welfare/consultation-on-the-racing-greyhounds-review>

Our preferred method of receiving responses is online because it is the fastest and most cost-effective way for us to collate and analyse responses. However, if you wish to respond to the consultation by email or in writing, please send responses to:

By email – [AnimalWelfare.Consultations@defra.gsi.gov.uk](mailto:AnimalWelfare.Consultations@defra.gsi.gov.uk)

Or

Animal Welfare Team  
Area 4B  
Nobel House

17 Smith Square,  
London  
SW1P 3JR

Please make sure your responses reach us by 31 December 2015.

## **What happens next?**

This consultation is an opportunity for all interested parties to scrutinise and comment on the initial findings of the Review so far, offering any other evidence either in support of the findings or by way of challenge to them. The consultation is also an opportunity for all interested parties to comment and, if needed, supply evidence on some of the possible options for further action.

After the consultation has concluded we will publish a summary of the responses received (see below). We will also analyse all the responses, together with the initial findings, to produce a final Post Implementation Review document. This document will set out how effective we believe the Regulations have been, whether they are still required, and, if so, if there is need for any amendments plus any other proposals for further action.



## 2. Confidentiality and data protection

- 2.1 A summary of the responses to this consultation will be published and placed on the Government website at [www.gov.uk/defra](http://www.gov.uk/defra)
- 2.2 The summary will include a list of names and organisations that responded but not personal names, addresses or other contact details. Information provided in response to this consultation, including personal information, may be subject to publication or release to other parties or to disclosure in accordance with the access to information regimes e.g. Freedom of Information Act 2000 (FOIA) and the Data Protection Act 1998.
- 2.3 If you want information, including personal data, that you provide to be treated as confidential, please say so clearly in writing when you send your response to the consultation why you need to keep these details confidential. If we receive a request for disclosure under the FOIA, we will take account of your explanation, but we cannot provide an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, if itself, be regarded as a confidentiality request.
- 2.4 This consultation is being conducted in line with the “Consultation Principles” as set out in the Better Regulation Executive guidance which can be found at <https://www.gov.uk/government/publications/consultation-principles-guidance>

If you have any comments or complaints about the consultation process, please address them to:

Consultation Co-ordinator  
Room 629  
9 Millbank  
17 Smith Square  
London  
SW1P 3JR

Or email: [consultation.coordinator@defra.gsi.gov.uk](mailto:consultation.coordinator@defra.gsi.gov.uk)

### 3. Initial findings of the Review

It is recommended that those wishing to respond to this consultation should read the accompanying 'Exploring Effectiveness of Racing Greyhound Legislation (2010)' Report before seeking to answer the questions set out below.

#### a) Condition 1: Attendance of a veterinary surgeon

The initial findings were that compulsory veterinary attendance at all race meetings and trials, with pre-running checks, has had a positive impact on greyhound welfare. This impact has been more pronounced at independent tracks, as veterinary attendance and checks were already at requirement at GBGB tracks before the Regulations were introduced.

**Question 1: To what extent do you agree with the following statement: 'veterinary attendance at all race meetings and trials with pre-running checks has, overall, had a positive impact on greyhound welfare'? Please provide any comments or evidence to support your answer.**

**Question 2: Do you agree or disagree that this condition should remain a legal requirement on all greyhound tracks in England? Please provide any comments or evidence to support your answer.**

**Question 3: Do you agree or disagree with the suggestion that the Regulations could be amended to better define the content of the veterinary inspection prior to any race, trial or sales trial? Please comment on what content would be useful.**

#### b) Condition 2: Facilities for the attending veterinary surgeon

The initial findings were the requirement to provide specified veterinary facilities has had an overall positive impact on greyhound welfare, allowing the vet to treat greyhounds if necessary. Again, this impact has been more pronounced at independent tracks, given veterinary facilities were already a requirement at GBGB tracks before the Regulations were introduced.

**Question 4: Do you agree or disagree with the initial findings that the provision of veterinary facilities has, overall, had a positive impact on greyhound welfare? Please provide any evidence to support your answer.**

**Question 5: In your opinion does the description of the facilities to be provided need to be amended in anyway? Please provide any suggestions.**

## **Veterinary independence**

The Review found that some participants spontaneously mentioned that greyhound welfare would be improved if the vet was financially independent from the track, with some anecdotal evidence suggesting that the vet's decision was not always final. However, all veterinary surgeons registered to practice in the UK undertake an oath to Royal College of Veterinary Surgeons (RCVS) to uphold the welfare of animals committed to their care.

**Question 6: To what extent do you agree with the following statement: 'the track vet has sufficient authority to ensure any ruling they make, with regard to whether a greyhound is fit to run, is carried out'? Please provide any comments or evidence to support your answer.**

## **Veterinary expertise and knowledge**

The Review found mixed views regarding the knowledge and expertise of vets, and whether this should be prescribed in Regulations. Some participants cited that the vets' knowledge and expertise was a 'valuable resource' which should be used more, while others suggested knowledge could be improved. Overall, there was no convincing argument put forward that track vets should be required by regulation to have a specialist qualification, especially where this requirement may restrict the number of vets available to tracks. Additionally veterinary surgeons practicing in England have a responsibility to ensure that they maintain and develop the knowledge and skills relevant to their professional practice and competence, as part of their professional responsibilities. This is monitored by the RCVS as the veterinary profession regulator.

**Question 7: To what extent do you agree with the following statement: 'the track vet does not need to obtain specialist racing greyhound training in order for them to operate as a track vet for the purpose of the Regulations'? Please provide any comments or evidence to support your answer.**

## **c) Condition 3: Kennels**

As above, the Review found the requirement to provide kennels had limited welfare impact at GBGB tracks, with a larger impact at independent tracks. However, people racing their dogs at independent tracks did not always use the kennels. Reasons given for this included a lack of supervision of the dogs at independent tracks whilst in the kennels. Further, there were comments on the length of time dogs were kennelled (although it should be noted there is no requirement in the Regulations to kennel greyhounds at the track), and a lack of clarity in the description of some of the characteristics of acceptable kennels in the Regulations e.g. comfortable area to lie, and ambient temperature where described as terms that could be clearer. No comments were received on whether the requirement for tracks to provide kennels for at least 20% of the total number of greyhounds present at the track to take part in a race or trials was still appropriate.

**Question 8: To what extent do you agree with the following statement: ‘it is important for welfare purposes that it remains a legal requirement for tracks to provide kennelling for dogs that race or trial at the track’? Please provide any comments or evidence to support your answer.**

**Question 9: Do you agree or disagree with the statement: ‘the requirement for tracks to provide kennels for at least 20% of the total number of greyhounds taking part in a race or trials is still appropriate’? Please provide any comments or evidence to support your answer.**

**Question 10: In your opinion do the requirements for adequate kennelling need amending to add clarity? Please provide any comments on which terms and why.**

## **Kennelling outside of the tracks**

Participants across all groups contributing to the initial findings have suggested that there should be regulation to cover kennels outside of the tracks; i.e. trainers’ and owners’ kennels. Separately, during the evidence gathering stage of the initial findings, the Dogs Trust published in June the report ‘The Greyhound Industry: Don't bet on fair treatment’. The report looked exclusively at conditions at trainers’ kennels, highlighting conditions it had found through undercover footage taken at five kennels in the UK. The Dogs Trust also recommended that “clear guidelines [for trainer’s kennels] need to be laid down in the form of regulation”.

As part of this Review the Government wishes to consider three practicable options for securing welfare standards at trainers’ kennels. These are listed below. Please remember that the Government’s ‘Principles of Regulation’, set out in the introduction to this Consultation document, require that regulation should not impose costs and obligations on business or individuals unless a **robust and compelling case has been made**.

- **Option 1:** Continue to rely on the existing animal welfare and cruelty offences provided in the Animal Welfare Act 2006. The Act covers all kennels (independent and GBGB) in England and Wales, and already provides power of entry and search which would allow inspectors (typically local authority inspectors) to investigate any concerns about the welfare of the greyhounds being kept at the kennels. Any trainer found to have neglected or been cruel to their greyhounds would be liable to criminal prosecution. Anyone who is found guilty of animal cruelty offences, or of offences of failing to provide for an animal’s welfare needs, may be banned from owning or keeping animals, fined an unlimited amount and/or sent to prison for up to six months.
- **Option 2:** In discussion with the Defra Minister, the GBGB has agreed to work through the British Standards Institute (BSI) and with relevant stakeholders to develop a Publicly Available Specification (PAS) for trainers’ kennels. The GBGB already operate their own trainers’ licensing scheme, with a comprehensive set of guidelines for greyhound kennels. Defra would expect GBGB to work with BSI and

a group of relevant stakeholders to develop these guidelines into consensus standards for trainers' kennels. We understand that this process can take up to 6 to 9 months. Once this PAS for trainers' kennels is agreed, we would expect the GBGB then to gain UKAS accreditation – by the end of 2017 - as a regulator of those standards. This would ensure that all trainers' kennels in Great Britain affiliated to the GBGB would be subject to those standards. Any trainers racing only on independent tracks would still be subject to the requirements of the Animal Welfare Act 2006, but there would also be, in the form of the PAS, a publically available, generally accepted set of standards for trainers' kennels for them to follow, that may be referred to in any court proceedings to demonstrate failures to meet the requirements of the Animal Welfare Act.

- **Option 3:** Amend the scope of the current Welfare of Racing Greyhounds Regulations 2010 to include trainers' kennels. New licensing conditions could be developed and either incorporated into a new draft set of regulations or alternatively the detailed conditions could be written into a PAS, adherence to which would form the main licensing condition of the new regulations. The regulations would need to be consulted upon before being laid before Parliament. The earliest these could come into force is by October 2017. As with the current Regulations, the standards would apply to all trainers in England, but there would be the same exemption from the need to obtain a local authority licence for any trainer licensed by a body accredited by UKAS in relation to the regulation of those standards (likely the GBGB). All other trainers would need a local authority licence.

**Question 11: Which of three options highlighted in this consultation for addressing welfare standards at trainer's kennels do you believe will best secure acceptable welfare standards? Please provide an explanation or comments on your choice: include demonstrating why this approach is superior to the alternative two options. You can also include, if possible, an analysis of the likely costs and benefits.**

#### **d) Condition 4: Identification of greyhounds taking part in races or trials**

Of all the licensing conditions, the requirement for all greyhounds taking part in a race or trial to be permanently identified by microchip and tattoo was cited as having 'the biggest and most positive impact on greyhound welfare'. There were some comments that greyhounds were not required to be microchipped to race at independent tracks. This is incorrect. All racing greyhounds in England must be microchipped before they can race or trial. Some respondents to the initial findings also suggested that traceability was only improved during the racing career of a greyhound, as the requirement to keep owner's or keeper's details up-to-date did not apply to greyhounds that no longer, or never, raced. Both points will be addressed from 6 April 2016, when The Microchipping of Dogs (England) Regulations 2015, will require all dogs in England to be microchipped from 8

weeks of age, with it being a legal requirement for the current keeper's details to be recorded on a database (that is compliant with those regulations) for the life of the dog.

There were some comments from participants about being unable to access details of owners of greyhounds from databases. Data Protection laws prevent personal details of anyone on a microchip database being given out to anyone who is not authorised to receive that information. Both The Welfare of Racing Greyhounds Regulations 2010 and The Microchipping of Dogs (England) Regulations 2015 authorise local authority officers and police officers as people able to access the personal details of people on microchip databases. The Government is satisfied that that strikes the right balance between protecting people's data protection rights and allowing personal data to be accessed appropriately in connection with regulatory activities.

Views were mixed as to whether the Regulations should still require greyhounds to be tattooed and microchipped. Some commented that tattooing was an unpleasant procedure, but this was outweighed by other benefits, such as being able to be read the greyhound's number without a scanner, and the tattoo database containing more details about the greyhound than the microchip database.

**Question 12: To what extent do you agree with the statement: 'the requirement that all greyhounds entering a race or trial must be permanently identified appears to have had a positive impact on greyhound welfare'? Please provide any comments or evidence to support your answer.**

**Question 13: From 6 April 2016, all dogs in England will be required to be microchipped from 8 weeks of age, with a legal requirement for the details of any new keeper of a dog to be updated on an acceptable microchip database. To what extent do you agree with the statement: 'the requirement for all dogs to be microchipped from 8 weeks of age will help further improve the traceability of greyhounds, including any greyhound that has left the sport'? Please provide any comments or evidence to support your answer.**

**Question 14: Given the Microchipping of Dogs (England) Regulations 2015 require microchips and microchip databases to meet specific standards, do you think the 2010 Greyhound Regulations still need to detail acceptable microchip and microchip database standards? Please provide any comments or evidence to support your answer.**

**Question 15: Do you think it should remain a legal requirement, for welfare purposes, for all racing greyhounds to be tattooed as well as microchipped? Please provide any comments or evidence to support your answer.**

## **e) Condition 5: Record of greyhounds taking part in races or trials**

Very little specific comment on this condition was submitted by participants contributing to the initial findings of the Review. Of those that did comment, many noted that the required information was being recorded but many felt uncertain as to how these records contribute towards greyhound welfare.

**Question 16: To what extent do you agree with the statement ‘it is important for welfare purposes for it to remain a legal requirement for tracks to keep records of dogs that race or trial at the track’? Do you have any comments or evidence to support your answer?**

## **f) Condition 6: Injury records in relation to races, trials, or sales trials**

The Review found that this licensing condition had a very limited impact on greyhound welfare. Many participants commented that, although the records were being kept as required, there was a discrepancy in the interpretation of an ‘injury’, with the suggestion that some minor injuries are not recorded by some tracks. Some participants suggested that there should be clear guidelines as to how injuries are interpreted and recorded, with greater use of electronic data recording. Many participants also raised concerns that injury data was not reviewed in a meaningful way, although for many participants their knowledge of whether the data was used was low. The initial findings did report examples from both independent and GBGB tracks where injury records had influenced decisions and changes to factors at a track.

A small number of examples were provided claiming that injury and euthanasia records were being manipulated by sending severely injured dogs home. Without any further information, Defra is unable to comment on this. However, as there is no legal requirement to publish injury statistics there does not appear to be any incentive to manipulate the data. Also, the injury data supplied as part of the quantitative part of the initial figures do not suggest manipulation of the injuries data over the five years that the Regulations have been in force.

Many participants contributing to the initial findings of the Review commented on the need for published injury records. Many cited this as a matter of transparency, although others believed that, if published on a track by track basis, it could lead to welfare improvements by encouraging competition between tracks to lower injury rates. Defra understands that the GBGB is currently rolling out new software to all its tracks which will enable track vets to input all injury records direct to a GBGB injury database. The GBGB injury database would record injury by type and enable each track to monitor its own injury records over time. The database would produce aggregate injury statistics for all GBGB tracks. Further, Defra understands that the GBGB plan to input historic injury records into the

database which will allow for comparisons to be made with previous years. The Government welcomes this work by the GBGB, and in discussion with the Defra Minister the GBGB has committed to annually publish aggregate injury and euthanasia statistics from its injury database, beginning with figures for the year 2017. The GBGB have also agreed to make anonymised track injury and euthanasia data available to others for bona fide research purposes.

Given this voluntary agreement from GBGB, and in line with the Government's approach to regulation (set out above) that self-regulatory or non-regulatory solutions are preferable where satisfactory outcomes can be achieved, the Government remains to be convinced that there is a robust and compelling case that legislation is needed to secure greater transparency. In addition, any legislative requirement to publish injury statistics would have to apply to both independent and GBGB tracks. As there is no central regulatory body for independent tracks, this would likely mean that all tracks would have to publish their statistics separately which the Government hasn't been convinced is necessary.

**Question 17: Do you agree or disagree with the statement 'it is important for welfare purposes for it to remain a legal requirement for tracks to keep records of dogs injured during a race, trial or sales trial'? Do you have any comments or evidence to support your answer?**

**Question 18: Do you agree or disagree that the injury details to be recorded, as required in Condition 6 of the Regulations, are still appropriate? Do you have any comments or evidence to support your answer, or suggestions for amendments?**

**Question 19: Should the Regulations be amended to require routine monitoring of the injury records by each track? Do you have any comments or evidence to support your answer?**

**Question 20: To what extent do you agree or disagree with the following statement 'the non-regulatory agreement by the GBGB to publish, from 2018, aggregate injury and euthanasia figures from GBGB tracks will improve transparency in the sport'? Do you have any comments or evidence to support your answer?**

## **Retirement records**

Some participants contributing to the initial findings of the Review suggested there should be a requirement to publish retirement records. It was also noted though that there is currently no statutory requirement to collect such records. As stated above, the Government remains to be convinced that there is a robust and compelling case that legislation is needed to require injury records to be published. This applies equally to the publication of retirement records, which – unlike injury records – are not already legally required to be kept. The Government believes, as stated above, that the introduction of the Microchipping of Dogs (England) Regulations 2015 should improve the traceability of all dogs, including greyhounds that have left the sport, by ensuring the details of new keepers must be kept up to date. Further, in discussion with the Defra Minister the GBGB



has agreed, from the first half of 2018, to annually publish summary statistics for the number of dogs that leave the sport each year (retired, rehomed, sold or euthanized).

**Question 21: To what extent do you agree or disagree with the following statement ‘the non-regulatory agreement by the GBGB to publish, from 2018, summary statistics for the number of dogs that leave the sport each year will improve transparency in the sport’? Do you have any comments or evidence to support your answer?**

## **g) Guidance**

The Review found mixed awareness and use of the guidance that was published in February 2010 for independent track operators. Those that were aware of the guidance found it valuable.

**Question 22: Do you have any comments on whether it is worthwhile for Defra to retain, updating if necessary, the Guidance for Independent Track Operators?**

## **h) Regulation**

There were mixed views from participants contributing to the initial findings of the Review on the roles played by UKAS, GBGB and local authorities in terms of enforcing the six licensing conditions discussed above. Participants commented that there appeared to be different standards of welfare, although the standards in the Regulations apply at all tracks in England. Evaluating the effectiveness of the standards in the Regulations is a key part of this Review, and the standards are discussed in detail above. What Defra wish to evaluate here is the effectiveness of how these standards are enforced. In general, the initial findings of the Review suggest that GBGB regulation of the standards in the Regulations was more robust than local authority licensing; inspections being undertaken more frequently by inspectors with a better knowledge of greyhound racing.

UKAS accreditation was recognised as a core regulatory tool and there was little criticism of the actual concept of an independent body such as UKAS, scrutinising the certification work of another body – in this case the GBGB. A number of comments were received suggesting that UKAS accreditation was unable to secure acceptable welfare standards. However, comments here appeared to focus on the standards required by the Regulations, rather than how the standards were enforced. If Defra opts to amend the standards in the Regulations then the standards that UKAS would require GBGB to regulate would be amended as well. There were some criticisms of the independence of GBGB’s regulatory work. However, these did not seem to recognise that, as part of its UKAS accreditation, GBGB’s certification work must be independent from its other functions (to maintain UKAS accreditation, there is within GBGB an independent Greyhound Regulatory Board, chaired by a QC as well as a separate Impartiality Committee). There was no evidence presented that this system, independently

scrutinised by UKAS, was not ensuring GBGB tracks were being adequately or independently regulated.

Participants contributing to the initial findings of the Review also reiterated concerns about a lack of transparency by the GBGB, as well as the regulatory scope of the Regulations (i.e. it should be extended to trainers' kennels). These have already been discussed above.

**Question 23: Based on the initial findings of the Review to what extent, do you agree or disagree that the enforcement of welfare standards required by the Regulations is satisfactory at (a) GBGB regulated tracks and (b) local authority licensed tracks? Do you have any comments or evidence to support your answers?**

## 4. Consultation Questions

Question 1: To what extent do you agree with the following statement: 'veterinary attendance at all race meetings and trials with pre-running checks has, overall, had a positive impact on greyhound welfare'? Please provide any comments or evidence to support your answer.

Question 2: Do you agree or disagree that this condition should remain a legal requirement on all greyhound tracks in England? Please provide any comments or evidence to support your answer.

Question 3: Do you agree or disagree with the suggestion that the Regulations could be amended to better define the content of the veterinary inspection prior to any race, trial or sales trial? Please comment on what content would be useful.

Question 4: Do you agree or disagree with the initial findings that the provision of veterinary facilities has, overall, had a positive impact on greyhound welfare? Please provide any evidence to support your answer.

Question 5: In your opinion does the description of the facilities to be provided need to be amended in anyway? Please provide any suggestions.

Question 6: To what extent do you agree with the following statement: 'the track vet has sufficient authority to ensure any ruling they make, with regard to whether a greyhound is fit to run, is carried out'? Please provide any comments or evidence to support your answer.

Question 7: To what extent do you agree with the following statement: 'the track vet does not need to obtain specialist racing greyhound training in order for them to operate as a track vet for the purpose of the Regulations'? Please provide any comments or evidence to support your answer.

Question 8: To what extent do you agree with the following statement: 'it is important for welfare purposes that it remains a legal requirement for tracks to provide kennelling for dogs that race or trial at the track'? Please provide any comments or evidence to support your answer.

Question 9: Do you agree or disagree with the statement: 'the requirement for tracks to provide kennels for at least 20% of the total number of greyhounds taking part in a race or trials is still appropriate'? Please provide any comments or evidence to support your answer.

Question 10: In your opinion do the requirements for adequate kennelling need amending to add clarity? Please provide any comments on which terms and why.

Question 11: Which of three options highlighted in this consultation for addressing welfare standards at trainer's kennels do you believe will best secure acceptable welfare standards? Please provide an explanation or comments on your choice: include demonstrating why this approach is superior to the alternative two options. You can also include, if possible, an analysis of the likely costs and benefits.

Question 12: To what extent do you agree with the statement: 'the requirement that all greyhounds entering a race or trial must be permanently identified appears to have had a positive impact on greyhound welfare'? Please provide any comments or evidence to support your answer.

Question 13: From 6 April 2016, all dogs in England will be required to be microchipped from 8 weeks of age, with a legal requirement for the details of any new keeper of a dog to be updated on an acceptable microchip database. To what extent do you agree with the statement: 'the requirement for all dogs to be microchipped from 8 weeks of age will help further improve the traceability of greyhounds, including any greyhound that has left the sport'? Please provide any comments or evidence to support your answer.

Question 14: Given the Microchipping of Dogs (England) Regulations 2015 require microchips and microchip databases to meet specific standards, do you think the 2010 Greyhound Regulations still need to detail acceptable microchip and microchip database standards? Please provide any comments or evidence to support your answer.

Question 15: Do you think it should remain a legal requirement, for welfare purposes, for all racing greyhounds to be tattooed as well as microchipped? Please provide any comments or evidence to support your answer.

Question 16: To what extent do you agree with the statement 'it is important for welfare purposes for it to remain a legal requirement for tracks to keep records of dogs that race or trial at the track'? Do you have any comments or evidence to support your answer?

Question 17: Do you agree or disagree with the statement 'it is important for welfare purposes for it to remain a legal requirement for tracks to keep records of dogs injured during a race, trial or sales trial'? Do you have any comments or evidence to support your answer?

Question 18: Do you agree or disagree that the injury details to be recorded, as required in Condition 6 of the Regulations, are still appropriate? Do you have any comments or evidence to support your answer, or suggestions for amendments?

Question 19: Should the Regulations be amended to require routine monitoring of the injury records by each track? Do you have any comments or evidence to support your answer?

Question 20: To what extent do you agree or disagree with the following statement 'the non-regulatory agreement by the GBGB to publish, from 2018, aggregate injury and

euthanasia figures from GBGB tracks will improve transparency in the sport'? Do you have any comments or evidence to support your answer?

Question 21: To what extent do you agree or disagree with the following statement 'the non-regulatory agreement by the GBGB to publish, from 2018, summary statistics for the number of dogs that leave the sport each year will improve transparency in the sport'? Do you have any comments or evidence to support your answer?

Question 22: Do you have any comments on whether it is worthwhile for Defra to retain, updating if necessary, the Guidance for Independent Track Operators?

Question 23: Based on the initial findings of the Review to what extent, do you agree or disagree that the enforcement of welfare standards required by the Regulations is satisfactory at (a) GBGB regulated tracks and (b) local authority licensed tracks? Do you have any comments or evidence to support your answers?