

EXPLORING EFFECTIVENESS OF RACING GREYHOUNDS LEGISLATION (2010)

FINAL Report for: Department for Environment,
Food and Rural Affairs

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1 Overview

This report details the findings from two strands of research carried out to support the Department for Environment, Food and Rural Affairs (Defra) review of the Welfare of Racing Greyhounds Regulations 2010.

The **first strand** of this work was carried out by GfK who completed independent qualitative and quantitative research. This research was independently designed and carried out by GfK. The core focus of this GfK research was to explore the five minimum standards to understand:

- To what extent the welfare of racing greyhounds at all tracks has improved as a result of the legislation
- To what extent the regulations have been effective
- To what extent the regulations are considered sufficient in terms of impact and scope to improve welfare across the life of a racing greyhound
- To what extent the legislation is felt to be an appropriate way of achieving the desired outcomes

The **second strand** of work was carried out by Defra who disseminated a survey via the Defra citizen space platform. This survey was designed, administered and answers collated by Defra. This survey was designed to provide further information about specific areas of the regulations, their scope and potential development to ensure that a broader stakeholder audience had opportunity to contribute their opinions and experiences.

Both strands of the research sought to gather views from relevant stakeholders across the industry regarding the regulations, and the impact they have had to greyhound welfare. The stakeholder groups included in each of these strands are shown below.

Defra survey	<ul style="list-style-type: none"> • Animal Welfare Organisations that work with greyhounds • Greyhound trainers, owners and breeders organisations • Industry bodies • Veterinary bodies
GfK research	<ul style="list-style-type: none"> • GBGB regulated tracks • Independent regulated tracks • GBGB • Vets (including track vets and veterinary bodies) • Local authorities • Trainers, owners and breeders • Re-homing organisations

Both evidence gathering strands are reported together to increase the strength of the conclusions as the sample sizes are small and to facilitate comparison across the sector. Feedback gathered across the research was often varied and contradictory reflecting the range of those who participated in the GfK research and the Defra survey. All agreed that the welfare of greyhounds is important with many citing suggestions for further welfare improvements to the regulations and wider industry. The following areas emerged frequently:

Impact of regulations

Across the research many participants noted that most of the requirements of the regulations had already been in place as part of GBGB (previously National Greyhound Racing Club) Rules of Racing prior to the enforcement of the Regulations in 2010. With this in mind, these participants noted that these regulations had seen limited impact on the welfare of greyhounds at GBGB tracks.

Proactive use of regulation data

Whilst the research suggests that the regulations are largely being met across tracks, there was little evidence to suggest that the industry worked with information and data generated by the regulations to identify ways to further improve greyhound welfare. Overall there were very few mentions of any regulatory data being used on an on-going and proactive basis to review and monitor welfare and generate further improvements within the industry. Anecdotally, data was only used reactively when an incident at a track suggested a review would be valuable.

Life course of the greyhound

It was noted that the welfare regulations focus on welfare at the tracks. Many felt that the scope of the regulations should be broadened to encompass more of the life of the greyhound outside of the track (e.g. cover welfare of greyhounds at trainer/ owner kennels) to work towards improved welfare across the life course of the greyhound. Some further suggested that retirement records and data should be clearly covered by any regulations to ensure that steps to improve welfare are considered across the life course of the greyhound and not limited to only their racing career.

Some participants noted that re-homing facilities for greyhounds continue to be at maximum capacity, and sometimes were unable to accommodate more retired greyhounds. However, these participants were unable to say whether this related to implementation of the regulations (in particular the requirement for all racing greyhounds to be permanently identified by microchip) as re-homing facilities were felt to have always been at maximum capacity and without access to data relating to numbers of greyhounds retiring from the sport these participants noted that it was not possible to compare trends over the years.

Independence

Overall, there was feedback regarding the perceived lack of regulatory independence within the industry, with some comments particularly noting concerns regarding self-regulation¹.

Transparency

Lack of transparency across the industry emerged as a key concern, and contributed towards mixed views and perceptions regarding the effectiveness of the regulations. Many noted that without access to data or publication of injury or retirement records, it was difficult to determine the impact the regulations have had on greyhound welfare.

“The impact of the regulation on welfare is difficult to assess - there is no transparency in relation to data and statistics which allows comparisons of pre and post regulation.”

¹ The GBGB are allowed to regulate the standards at GBGB tracks due to their being accredited by UKAS as a regulator of those standards; whereas standards at independent tracks are regulated by the local authority.

Overall, the research gathered a good spread of views from stakeholders across the industry. The diversity of the industry and of the views gathered means that it is difficult to draw strong conclusions. However, overall, participants did feel that the regulations positively impacted on the welfare of greyhounds. Some highlighted ways in which the regulations could be strengthened by providing more detail and therefore greater consistency regarding the management of greyhounds and their environment. Some also suggested ways in which the scope of the regulations could be broadened to further improve the welfare of greyhounds. These are discussed in the relevant sections which contain detailed views regarding each condition of the regulations in the remainder of this report.

2 Introduction

2.1 Background

The main objective of the Welfare of Racing Greyhounds Regulations 2010 was to improve the welfare of racing greyhounds at the track. The industry covered by the regulations consists of 24 tracks regulated by the Greyhound Board of Great Britain (GBGB) and 5 independent tracks spread across England.

The regulations contain five minimum standards that should apply at all greyhound racing tracks in England, they are;

- Veterinary presence at all race meetings, race trials and sales trials; with all greyhounds inspected by the vet before being allowed to run
- Appropriate facilities for the veterinary surgeon to administer first aid to animals at all tracks
- Adequate kennelling at all tracks
- All racing greyhounds to be microchipped and earmarked
- All tracks to maintain records of dogs raced or trialed and injuries occurring at the track for 10 years.

The Welfare of Racing Greyhounds Regulations 2010 has been in force for five years as of 6th April 2015. At the time of introduction the Department for Environment, Food and Rural Affairs (Defra) committed to undertaking a non-statutory review of the policy in 5 years from the commencement of the Regulations.

Defra is carrying out a review which aimed to look at the effectiveness of the legislation, whether the issues that led to the introduction of the Regulations are still valid and relevant; if so, whether regulation is still the best way of tackling those issues; and if regulation is still justified whether there are any areas where the Regulations, or their scope, can be improved.

2.2 This report

This report details findings from two strands of work carried out to support this Defra review.

The **first strand** of this work was carried out by GfK who completed independent qualitative and quantitative research. This research was independently designed and carried out by GfK. The core focus of this GfK research was to explore the five minimum standards to understand:

- To what extent the welfare of racing greyhounds at all tracks has improved as a result of the legislation
- To what extent the regulations have been effective
- To what extent the regulations are considered sufficient in terms of impact and scope to improve welfare across the life of a racing greyhound
- To what extent the legislation is felt to be appropriate way of achieving the desired outcomes

The **second strand** of work was carried out by Defra who developed multiple targeted survey questions to provide a mechanism for a broader range and number of stakeholders who might not be interviewed to provide evidence via the Defra citizen space platform. The questions were designed to address the areas of the legislation relevant to the different stakeholders and to fit the type of information required and size of the stakeholder communities. Where the community is small open qualitative questions were used. Where more people might be expected to respond, closed questions were included. This survey was designed, administered and answers collated by Defra

The qualitative data collected in the Defra survey was included in the analysis of the interviews carried out by GfK. Where possible, some of the quantitative data collected in the Defra survey is included in the report as considerable effort was made by those who contributed, and their input has value. However, the number of responses received was not high and the data should be interpreted with great caution.

Both strands of the research sought to gather views from relevant stakeholders across the industry regarding the regulations, and the impact they have had to greyhound welfare. The stakeholder groups included in each of these strands are shown below.

Defra survey	<ul style="list-style-type: none"> • Animal Welfare Organisations that work with greyhounds • Greyhound trainers, owners and breeders (invited via organisations' mailing lists and websites) • Industry bodies • Veterinary bodies (and individuals)
GfK research	<ul style="list-style-type: none"> • GBGB regulated tracks • Independent regulated tracks • GBGB • Vets (including track vets and veterinary bodies) • Local authorities • Trainers, owners and breeders • Re-homing organisations

The table below shows the different topics explored across both strands of research, and which stakeholders were invited to provide a response on these. It should be noted that in some cases stakeholders may have participated in both the GfK research and Defra survey.

Topic	Research strand	Stakeholders invited to comment
Welfare of Racing Greyhounds Regulations 2010 Condition 1: Attendance of a	GfK research	Regulated tracks, independent tracks, GBGB, vets, local authorities, trainers/owners/breeders
	Defra survey	Trainers/owners, vets



veterinary surgeon		
Welfare of Racing Greyhounds Regulations 2010 Condition 2: Facilities for the attending veterinary surgeon	GfK research	Regulated tracks, independent tracks, GBGB, vets, local authorities
	Defra survey	Vets
Welfare of Racing Greyhounds Regulations 2010 Condition 3: Kennels	GfK research	Regulated tracks, independent tracks, GBGB, vets, local authorities, trainers/owners/breeders
	Defra survey	Trainers/owners, vets
Welfare of Racing Greyhounds Regulations 2010 Condition 4: Identification of greyhounds taking part in races or trials	GfK	Regulated tracks, independent tracks, GBGB, vets, local authorities, trainers/owners/breeders, re-homing organisations
	Defra survey	Welfare organisations, Trainers/owners, vets
Welfare of Racing Greyhounds Regulations 2010 Condition 5: Records of greyhounds taking part in races or trials	GfK research	Regulated tracks, independent tracks, GBGB, vets, local authorities, trainers/owners/breeders, re-homing organisations
	Defra survey	Trainers/owners, vets
Welfare of Racing Greyhounds Regulations 2010 Condition 6: Injury records in relation to races, trials or sales trials	GfK research	Regulated tracks, independent tracks, GBGB, vets, local authorities, trainers/owners/breeders, re-homing organisations
	Defra survey	Vets
Welfare of Racing Greyhounds Regulations 2010 Guidance	GfK research	Independent tracks, local authorities, those associated with independent tracks
Regulation of the Welfare of Racing Greyhounds Regulations 2010	GfK research	Regulated tracks, independent tracks, GBGB, vets, local authorities, trainers/owners/breeders, re-homing organisations
	Defra survey	Welfare organisations, Trainers/owners, vets
Greyhound retirement/life course	Defra survey	Welfare organisations, Trainers/owners
Track pre-race inspections	Defra survey	Trainers/owners

Qualitative analysis of responses received demonstrated clear themes across both the Defra survey and GfK research. Therefore, findings from both the GfK research and Defra survey have been detailed in this report.

2.3 GfK research approach

2.3.1 Qualitative depths

The research used a qualitative method, which involved 44 telephone interviews lasting around 45 minutes each. By using telephone interviews, the research was able to include a sample from a wide geographical spread and to ensure greater confidentiality and anonymity for the participants. This latter point was a pertinent issue within the research and is further discussed below in relation to research verbatims.

The research explored participants' views and opinions on how effectively they felt the regulations are currently working, particularly in relation to the five minimum standards. The research also explored wider greyhound welfare issues that are not covered by the five minimum standards.

Fieldwork was carried out between 23rd February and 24th April 2015.

It is important to stress that qualitative research is investigatory in approach and whilst this study has generated detailed feedback regarding the regulations, it has not sought to provide statistically robust data. However, some quantitative data of injury records was gathered by GfK to supplement the qualitative research findings, and this approach is described in section 2.3.2.

Sample

Details of the quotas and achieved sample can be found in the table below;

Sample groups	Quotas	Recruited
Regulated tracks	10	9
Independent tracks	4	3
GBGB	2	2
Vets (including track vets and veterinary organisations)	12	12
Re-homing centres	6	7
Trainers, Owners, Breeders	6	7
Local Authorities	4	4
Total	44	44

The design of the sample included a good spread of those within the greyhound industry to ensure that views and opinions of those were captured from different groups to provide a holistic exploration of the effectiveness of the regulations.

Whilst the sample structure was designed to provide a depth perspective within a small industry it should be noted that the sample universe for trainers, breeders and owners is large and diverse, and the number of telephone interviews included for this audience is small. This was one area where the Defra survey adds value by broadening the evidence base.

Research verbatims

In-line with the Market Research Society code of conduct, verbatim responses made by participants during the qualitative telephone depth interviews have not been quoted in this report to protect the

anonymity of participants. It is particularly important to note that the nature of the industry means that participants were aware that identification of responses may be easily made, which made anonymity of their responses a key concern.

The verbatim quotes within this report are provided by those responding to the Defra survey. In-line with best practice for confidentiality, these verbatim quotes are not attributed to individuals or organisations.

Recruitment

The recruitment for this research employed mainly a list recruitment approach where a list of relevant stakeholders and organisations were provided by Defra to GfK. GfK then independently contacted stakeholders and organisations from this list and recruited a selection of participants in line with the sampling quotas detailed above. Additionally, a snowball recruitment method was used enabling GfK to reach broader and additional participants by asking those taking part in the research to recommend someone else relevant to the research to contact for research purposes.

All recruitment was conducted under the Market Research Society Code of Conduct and the Data Protection Act 1998. All contact details were held securely and were not forwarded on to third parties.

2.3.2 Quantitative analysis of injury records

The Race Course Promoters Association (RCPA) agreed to provide the injury and euthanasia aggregate figures from their 22 members, all of whom are also members of GBGB. Five of these 22 tracks then provided their individual injury and euthanasia records to enable us to check the RCPA figures were accurate. It would have been disproportionate and very difficult to have got this data from all tracks as each track would have needed to provide 5 years of data. Records were also received from two of the independent tracks. The two operators of the independent tracks had only recently taken over the tracks and did not have many years of data to provide. We were also unable to get any data from the 2 GBGB tracks not part of RCPA. Once data was delivered GfK, staff counted the number of serious injuries and cases of euthanasia in each year, to see if anything had changed.

2.4 Defra survey approach

A survey was carried out through Defra's citizen space platform and sent to industry relevant organisations with wide memberships for dissemination to their members. The survey link was sent to:

- Animal Welfare Organisations that work with greyhounds
- Greyhound trainers, owners and breeders organisations
- Industry Bodies
- Veterinary Bodies

103 completed responses were received: 62 from trainers, 27 from welfare organisations, rehoming organisations and individuals, 10 from business organisations and others, 4 from veterinary organisations. The questions were designed to address the areas of the legislation relevant to the different stakeholders and to fit the type of information required and size of the communities. Where the community is small (e.g. welfare organisations) open qualitative questions were used. Where



more people might be expected to respond (e.g. trainers) more closed questions were possible. Open questions were analysed as positive/ negative and then coded by theme within the answer to identify issues. Closed questions were analysed by number of responses to each option – positive, negative and unsure. Where details were provided these were analysed as for open questions to identify any themes.

The full list of questions asked is provided in the annex. There was also an opportunity for organisations to upload files and the rehoming organisations provided their data. This data often cited issues regarding greyhound welfare across the life course which mirrored responses given by participants in the GfK research and responses to the Defra survey. However, this data is not provided in detail within this report.

Respondents were considered, by their own designations as welfare organisations, owners/ breeders/ trainers, Business/ finance, or other, with the exception of one from an 'owner' who never had dogs that raced which was re-designated as welfare. Only one betting industry organisation replied with the rest of the business/ other category responses being largely from individuals.

3 Condition 1: Attendance of a veterinary surgeon

- 1. A veterinary surgeon must be in attendance throughout the duration of a race, trial or sales trial and before a race, trial or sales trial in order to undertake the inspections.**
- 2. Before any race, trial or sales trial:**
 - (a) An attending veterinary surgeon must inspect every greyhound intended to run in that race, trial or sales trial; and**
 - (b) The operator must remove from a race, trial or sales trial any greyhound which the attending veterinary surgeon has ruled unfit to run.**
- 3. An operator must ensure that a register of attendance of veterinary surgeons is kept at the track, recording:**
 - (a) The date of the race, trial, or sales trial; and**
 - (b) The name, Royal College of Veterinary Surgeons membership number and signature of the attending veterinary surgeon.**
- 4. The attending veterinary surgeon must attest in the register that, before each race, trial or sales trial, they inspected every greyhound which took part.**
- 5. The information referred to in sub-paragraphs (3) and (4) must be kept for at least 3 years from the date of the race, trial or sales trial.**

The comments in this section are based on responses to the Defra survey amongst trainers, owners and vets and responses to the GfK research amongst regulated tracks, independent tracks, GBGB, vets, local authorities and trainers/ owners/ breeders.

Veterinary presence was generally considered to have a positive impact on the welfare of racing greyhounds helping to ensure that dogs are fit to race and that any injuries are quickly attended to. Before the regulations came in to force, veterinary presence was already required at GBGB tracks, and therefore participants at GBGB tracks felt that this regulation had resulted in limited impact on greyhound welfare since 2010.

“I have owned greyhounds since [the mid 1990’s] and there has always been veterinary presence at the [GBGB] tracks where my greyhounds have run.”

A small number of participants did comment that the regulations had however ensured that a vet was present at all times during a race, trial or sales trial at GBGB tracks. Whilst vets had been present at these tracks before, the regulation had formalised this requirement, reinforcing that it is an important provision.

Both trainers and owners who race their greyhounds at independent tracks and GBGB tracks were asked the following question as part of the Defra survey:

Which of the following statements best reflects your opinion:

Please select all that apply

- The requirement for veterinary presence associated with the legislation has improved the welfare of the dogs which I breed, own, and/or train.
- The requirement for veterinary presence associated with the legislation has made no difference to the welfare of dogs which I breed, own and/or train.

- The requirement for veterinary presence associated with the legislation has had a negative impact on the welfare of the dogs which I breed, own, and/or train.

62 responses were given in total including 45 responses from trainers and owners who race their greyhounds at GBGB tracks and 17 responses from trainers and owners who race their greyhounds at independent tracks.

The small sample sizes in the quantitative survey mean that data should be treated with some caution as findings may be as much as 10%-15% different to those shown had all trainers taken part in the survey. This calculation is based on sampling error and does not make allowance for possible bias caused by self-selection.

The Defra survey data² showed that trainers and owners who race their greyhounds at GBGB tracks and those who race their greyhounds at independent tracks who responded to the survey felt that the effect of veterinary presence on welfare at GBGB tracks had either improved welfare or this had stayed the same and that veterinary presence at independent tracks had improved welfare.

As discussed above, GfK research participants felt that veterinary presence was important but had previously been in place at tracks. They therefore felt that this inclusion in the regulations whilst important was considered to have had a limited impact.

The GfK research found that for independent tracks, there was an on-going financial cost to meet this regulation and veterinary presence was usually one of their largest financial outlays. However, despite this cost it was agreed across all tracks that veterinary presence was important to the welfare of greyhounds. The key benefits cited focused on helping to ensure that dogs are fit to race and ensuring that any injuries are quickly attended to.

.....
"Having been involved with independent racing and licenced for many, many years I feel that now the vet has to attend at all trail and race sessions vetting the dogs prior to racing, and being on hand to deal with any injuries is beneficial to the welfare of the dogs."
.....

An additional key benefit of veterinary presence at tracks was the role of **pre-race checks**. Those who commented on pre-race checks across the Defra survey and GfK research were trainers, breeders, owners and vets.

Overall, participants felt that pre-race checks had a positive impact on greyhound welfare with veterinary expertise identifying whether a dog is fit to race.

.....
"This pre-race inspection might stop a dog racing that should not run because of a problem the trainer might have missed."
.....

² Please note that these findings from the Defra survey should be treated with caution due to the small sample size (45 responses from trainers and owners who race their greyhounds at GBGB tracks and 17 responses from trainers and owners who race their greyhounds at independent tracks).



“Vets checking dogs before they race can only be a benefit to us all as they are qualified to notice any illness etc. that the average person isn't qualified to find.”

As pre-checks had already been required at GBGB tracks before the introduction of the regulations this again was felt to have had limited impact on the welfare of greyhounds at those tracks. However, some did feel that there had been a positive impact at independent tracks. It should be noted that some participants commented that they would themselves withdraw their dog if they felt it was not fit to race and therefore reflected that in these instances pre-race checks had a limited impact on greyhound welfare.

“(Pre-race inspections have) made no difference as I would not bring any dogs to the track that weren't 100% fit to run.”

Both trainers and owners who race their greyhounds at independent tracks and GBGB tracks were asked the following question as part of the Defra survey:

Which of the following statements best reflects your opinion:

Please select all that apply

- The requirement for pre-race inspection associated with the legislation has improved the welfare of the dogs which I breed, own, and/or train.
- The requirement for pre-race inspection associated with the legislation has made no difference to the welfare of the dogs which I breed, own, and/or train.
- The requirement for pre-race inspections associated with the legislation has had a negative impact to the welfare of the dogs which I breed, own, and/or train.

62 responses were given in total including 45 responses from trainers and owners who race their greyhounds at GBGB tracks and 17 responses from trainers and owners who race their greyhounds at independent tracks.

The Defra survey³ found that many survey participants felt that pre-checks had resulted in no change for the welfare of greyhounds at GBGB tracks but effected improvement to greyhound welfare at independent tracks.

Pre-race checks were not a core part of the GfK research discussion topics but were spontaneously raised by GfK research participants (which included regulated tracks, independent tracks, GBGB, vets, local authorities and trainers/ owners/ breeders) when discussing attendance of a veterinary surgeon. The comments below are drawn from both Defra survey responses and GfK research responses.

³ Please note that these findings from the Defra survey should be treated with caution due to the small sample size (45 responses from trainers and owners who race their greyhounds at GBGB tracks and 17 responses from trainers and owners who race their greyhounds at independent tracks).

Whilst it was agreed that pre-race checks were important it was noted that the quality of these was not consistent across all tracks. It was suggested that this was something that regulation should seek to address.

.....
"Pre-race inspection is a must but must be done properly at all tracks, some are better than others."
.....

Additionally, some participants felt that pre-race checks were too brief with very limited time for the vet to inspect each dog before being kennelled and raced. They felt that this could lead to smaller health problems not being identified.

.....
"The amount of time that the vet has to inspect runners before kennelling and before a race is very limited and they have no time to properly check whether a greyhound is sound or not."
.....

A small number of participants commented that by double kennelling (discussed in section 5), not all dogs would have to be inspected at the same time, allowing more time for pre-race checks to be conducted.

Views regarding efficacy of the track vet in carrying out pre-race checks was varied. A small number of participants commented that they felt that pre-race checks did not have an overall positive impact on greyhound welfare where they felt track vets were not sufficiently qualified to inspect a racing animal. This raised concerns that some minor health problems could be missed. A couple of participants cited anecdotal examples of greyhounds racing when their physical condition suggested that this should not be the case due to insufficient vet qualifications/ experience with racing animals and/ or lack of time for pre-race checks.

.....
"Pre-race inspection should improve welfare... I have seen dogs that are clearly lame being overlooked and allowed to run."
.....

These participants felt that greater clarification within the regulations of what should be examined at pre-race checks would contribute towards standardised thorough checks across all tracks.

All participants commented that a register of veterinary attendance is signed and kept across all tracks although some were unclear how often this was checked and monitored and therefore to what extent it contributed towards the monitoring of greyhound welfare.

Condition 1 Summary

The comments regarding Condition 1 are based on responses to the Defra survey amongst trainers, owners and vets and responses to the GfK research amongst regulated tracks, independent tracks, GBGB, vets, local authorities and trainers/ owners/ breeders.

- **Many participants from across the stakeholder responses from both the Defra survey and GfK research felt that veterinary attendance at the race track and pre-race checks has a positive impact on greyhound welfare** with veterinary expertise identifying whether a dog is fit to race.
- **Veterinary presence was already required at GBGB tracks;** therefore it was felt to have a limited impact since the regulations. Whilst vets had been present at these tracks before, the regulation had formalised this requirement, reinforcing that it is an important provision. A small number commented that the regulations now ensured a vet was present at all times during a race, trial or sales trial.



- **Independent tracks typically did not employ a vet before the regulations;** and this is usually one of their largest and most regular financial outlays to meet the regulations.
- **Some participants from across the stakeholder responses from both the Defra survey and GfK research felt that the quality of pre-race checks was not consistent across all tracks.** Additionally, some participants felt that pre-race checks were too brief with very limited time for the vet to inspect each dog and a small number felt track vets were not sufficiently qualified to inspect a racing animal.
- **It was reported that all tracks (GBGB and independent) keep and sign a register of vet attendance;** however there was uncertainty of how often this register was monitored and therefore to what extent it contributed towards the monitoring of greyhound welfare.

4 Condition 2: Facilities for the attending veterinary surgeon

1. The attending veterinary surgeon must have access to:

A. either a room or a mobile facility which—

- (i) is clean and has walls and floors with an impervious and easily cleanable surface;
- (ii) is lockable;
- (iii) is well lit;
- (iv) has heating and ventilation;
- (v) has hot and cold running water;
- (vi) has an examination table suitable for examining greyhounds;
- (vii) has a lockable cupboard suitable for the storage of veterinary medicines;
- (viii) has a fridge suitable for the storage of veterinary medicines; and
- (ix) is located close enough to the area where a race or trial or sales trial is being undertaken to allow quick access in the case of an emergency;

B. a freezer suitable for the storage of a greyhound carcass; and

C. a kennel, which complies with the operator's requirements in relation to kennels and which is within reasonable proximity to the room or mobile facility used for emergency veterinary cases.

2. The facilities described in sub-paragraph (1) must be for the sole use of the attending veterinary surgeon:

A. at all times, in the case of a room; or

B. whenever the veterinary surgeon's attendance is required under condition 1, in the case of a mobile facility, freezer and kennel.

The comments in this section are based on responses to the Defra survey amongst vets and responses to the GfK research amongst regulated tracks, independent tracks, GBGB, vets and local authorities.

Overall, many participants across the Defra survey and the GfK research considered veterinary facilities provided at the track to have had a positive impact on greyhound welfare allowing the vet to treat greyhounds accordingly. It was noted that most GBGB tracks had provided veterinary facilities before the regulations came into force – but most of these tracks had made some changes to ensure that the facilities met the required 2010 regulations and standards.

Independent tracks usually did not have veterinary facilities before the regulations came in to force. These had typically been built around the same time as the kennel facilities to comply with regulations.

Participants considered most veterinary facilities across GBGB and independent tracks to be 'first aid' facilities rather than full veterinary clinics; this was felt to be appropriate by many. A couple of participants cited positive anecdotal examples where tracks were perceived to have gone beyond the regulations in providing additional veterinary facilities, equipment and monitoring these facilities to contribute further towards the welfare of greyhounds.

However, some commented that veterinary facilities were not always well maintained, noting that the standard of cleanliness was not consistent across all tracks.

.....
"The facilities [at the track] do 'tick all the boxes' but are barely adequate. The room is too small, it is used by far too many...it is not cleaned or kept in good repair – everything is done on the cheap."
.....

Some felt that the regulations should detail specific minimum hygiene standards of these facilities.

4.1 Veterinary independence

During the original public consultation on the regulations there was a suggestion that the required vet should be financially independent from the track (or even from the industry.)

Veterinary independence from the race track was spontaneously mentioned by some participants who felt that it would be beneficial to the welfare of racing greyhounds. It was suggested that if vets were financially independent from the track, it could reduce the potential for their decision making to be influenced and negate the potential for conflict of interests.

Although not a common occurrence, there was some anecdotal evidence suggesting that the vet decision was not always treated as final, and was sometimes overridden by others at the track. These few anecdotal examples focused on decisions regarding whether a dog was fit to race or the condition of the track. Based on these circumstances, it was felt that if the vet was independent from the race track, it would provide greater confidence when making decisions.

“Because vets are not independent [paid by the track], their judgement is not always what it should be.”

For some, financial independence was also considered to be a good way to contribute towards an overall expert independent viewpoint for the industry. This comment was raised by some participants across all of the sample groups included in the research.

4.2 Veterinary expertise and knowledge

Issues raised outside of the regulations: maximising vet expertise and knowledge and greyhound specific qualifications

Participants from the GfK research were specifically asked about veterinary qualifications and additionally spontaneously mentioned factors relating to vet expertise and knowledge. This included feedback from regulated tracks, independent tracks, GBGB, vets and local authorities to comment on this particular topic. These issues were also mentioned by vets in the Defra survey. The comments in this section are therefore based on responses from these stakeholder groups.

Views regarding vet expertise and knowledge were mixed. Positive responses were provided by participants from across stakeholder groups. Where particularly positive about this, some participants felt that track vets' expertise and knowledge should be utilised more often, noting that this was a valuable resource available to the industry that could help contribute further towards the welfare of greyhounds. For example, it was suggested that vets be consulted and a key part of the decision making process regarding track safety and kennel standards. It was agreed that this type of involvement could lead to a positive impact on issues such as injury rates, and kennel conditions. Some further noted that veterinary expertise and knowledge would be valuable in reviewing and

monitoring the condition of the track itself with these participants noting that condition of the track plays a large role in greyhound welfare yet is not covered by the 2010 welfare regulations.

“It is obviously important to have a vet present, but I also believe they should be more involved with the track, the running surface and the grading of the dogs.”

There were also mixed comments regarding the extent to which vet decisions are upheld. Some noted that vet decisions were always upheld whilst a small number cited direct experience of vet decisions being over-ruled by others at the track.

“Unfortunately a lot of track vets get over ridden by promoters. They should have more power to stop/cancel racing if running surfaces are not adequate/weather conditions, etc.”

Those who were more negative regarding vet expertise and knowledge queried the extent of vet expertise and knowledge with regards to racing animals, and focussing specifically on greyhounds suggesting that this could be improved in some cases.

There were mixed views regarding the role that greyhound specific veterinary qualifications could play.

Some felt it would be a good idea for the vet to have specific qualifications for three reasons. Firstly, they felt that the qualification would make the vet seem more credible in conducting their work with greyhounds, and knowledgeable when making decisions. Secondly, they noted that it could provide vets with greater expertise and knowledge in greyhounds, particularly as racing animals' health needs and injuries are different to domestic animals. Thirdly, it was suggested that qualifications may particularly benefit new vets entering the veterinary industry, as they would usually possess less experience in their new role.

However, other participants felt that due to the nature of the job, such as unsociable hours, it was difficult for tracks to recruit vets, and requiring further qualifications could make recruitment even more challenging.

Some participants felt that the required skill set to work with racing greyhounds would be better acquired through experience and 'learning on the job', as some valued experience more than a qualification. This was mentioned in relation to learning about a racing animal and learning in a race track environment, which was noted to be considerably different to a veterinary practice environment.

“The veterinary presence is only as good as the knowledge of the individual vet on duty. Most track vets are 'pet vets' and do not have an in depth knowledge of racing greyhounds.”

“Some track vets are just cheap hire and not suitably qualified to advise on treating greyhounds. All track vets should be used to treating racing/working dogs; know about muscles, bone structure, rehydration, and basic track maintenance.”

It was suggested by a small number of participants that funding be provided enabling vets to attend 'refresher sessions' to attain up-to-date information relating to their role as a track vet.

Condition 2 Summary

The comments regarding Condition 2 are based on responses to the Defra survey amongst vets and



responses to the GfK research amongst regulated tracks, independent tracks, GBGB, vets and local authorities.

- **Many considered the provision of vet facilities to have had a positive impact on greyhound welfare** as it ensures that greyhounds can be treated accordingly at the track.
- **Many GBGB tracks provided veterinary facilities before the regulations came into force**, but a lot had to make some changes when the regulations came in to ensure that these were met.
- **Typically independent tracks had to provide veterinary facilities when the regulations came in to force**, as these were not provided beforehand.
- **Anecdotal evidence suggested that hygiene standards of vet facilities at some tracks were not always maintained**, there is a perceived lack of consistency across tracks.
- **For some, veterinary independence from the race track was spontaneously mentioned as it could reduce the potential for influence on vet decisions**, and also provide an independent standpoint and expertise for the industry.
- **There were mixed views regarding the role of greyhound specific veterinary qualifications efficacy**; some participants felt that these qualifications would make the vet seem more credible in conducting their work and knowledgeable when making decisions. However, some participants felt that due to the nature of the job it is already difficult for tracks to recruit vets, **and requiring further qualifications could make recruitment even more challenging**.
- **Some felt that track vets' expertise and knowledge should be utilised more often**, as this would contribute further towards greyhound welfare, such as being **part of the decision making process regarding track safety and kennel conditions**.

5 Condition 3: Kennels

On and after 6th April 2013 kennels must be provided for at least 20% of the total number of greyhounds which are present at the track at any one time for the purpose of taking part in a race or trial.

The comments in this section are based on responses to the Defra survey amongst trainers, owners and vets and responses to the GfK research amongst regulated tracks, independent tracks, GBGB, vets, local authorities and trainers/ owners/ breeders.

Before the regulations came into force, kennelling was already provided for all dogs at GBGB tracks, and therefore participants felt there was limited impact on greyhound welfare for these tracks since 2010. However, it was noted that most GBGB tracks had made some changes when the regulations came into force to ensure kennelling facilities met the required standards for example, installing viewing panels.

For independent tracks, the introduction of the regulations typically had a larger impact as kennelling was not always provided prior to the 2010 regulations. Consequently independent tracks had to finance the construction of kennels, which they found to be a large financial outlay for which there had been no financial support from the industry.

At GBGB tracks, it was found that all kennels were used in-line with the requirement in GBGB guidelines. However, it was found that at independent tracks, kennels were not always used, and sometimes greyhounds were kept in a car/ van instead. A range of reasons were cited for this decision including lack of stewards/ kennel hands and therefore lack of supervision of dogs whilst in kennels. Some also commented that kennelling dogs at the tracks did not benefit their welfare, as they could become stressed or agitated in the kennel environment and therefore preferred not to use the kennels provided.

.....
"Some of the dogs I have owned do not kennel well at tracks, therefore I personally do not need or use the kennels."
.....

As part of GBGB guidelines, all dogs at the racetrack should be kept in the kennels for a minimum of 30 minutes prior and 15 minutes after racing⁴; and this was generally felt to have a positive impact on greyhound welfare. Participants stated that some injuries were not apparent immediately before or after a dog has raced, and minimum kennelling time requirements helped to ensure that injuries were found and treated accordingly.

However, some felt that greyhounds are kennelled for too long at the track. Anecdotal examples were given where dogs were kennelled prior to the commencement of any racing but competed in the last race of the evening which could be some hours later. It was also noted that there was sometimes lack of space or time to warm up before racing which could increase the likelihood of injury. With this in mind, some suggested double kennelling, where dogs in early races are kennelled

⁴ The GBGB requirement to kennel prior to racing is primarily for integrity purposes



first, and dogs in later races are kennelled later on. It was felt that this would have a positive impact on greyhound welfare as dogs would not be kept in kennels for an unnecessary length of time.

“I believe that dogs’ being kennelled is far too long. To have to kennel a dog at 6pm that might not be racing till 10pm...results in dogs picking up pulled muscles etc.”

“ALL greyhounds should be kennelled in secure, safe, comfortable, and clean kennels. I would go a step further by having a maximum time kennelled, plus at least 2 separate blocks - 1 for early races, and 1 for later races so as to ensure that the dogs are not disturbed and get excited and stressed.”

Each kennel must:

- (a) if installed after the date on which these Regulations come into force, be at a minimum 136cm long, 87cm wide and 110cm high internally;**
- (b) be occupied by no more one than one greyhound;**
- (c) have walls and floors with a cleanable surface;**
- (d) be cleaned between use by individual dogs;**
- (e) have a comfortable area for a greyhound to lie;**
- (f) be adequately lit to allow the safe examination and handling of a greyhound;**
- (g) allow a greyhound to be observed when inside;**
- (h) be constructed so as to minimise any risk of injury to a greyhound;**
- (i) have a regular flow of clean air, whether by natural or artificial means, to allow sufficient ventilation for a greyhound;**
- (j) have an ambient temperature suitable for dogs just raced; and**
- (k) be disinfected and dried between days on which races, trials or sales trials take place.**

Overall views towards the kennelling standards at tracks were mixed, and many focussed on the quality of the facilities provided. Some commented that kennels were not always cleaned properly between races, and there were mixed personal preferences and views regarding the bedding provided and the provision of water in kennels.

“‘Comfortable area to lie in’ is also too woolly. A firm rubber mat may be more comfortable than a hard floor but when the hounds have to be kennelled for up to 6 hours without the opportunity to urinate and end up lying in urine, because there is no way they can avoid do so, good welfare standards are not being practiced.”

Both trainers and owners who race their greyhounds at independent tracks and GBGB tracks were asked the following question as part of the Defra survey:

Condition 3 of the Licensing Conditions sets out the standards for the kennels. Please see the extract from the guidance provided below. Do you agree that these standards are suitable?

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

61 responses were given in total including 45 responses from trainers and owners who race their greyhounds at GBGB tracks and 16 responses from trainers and owners who race their greyhounds at independent tracks.

The Defra survey⁵ found that attitudes towards the suitability of kennelling as defined in the legislation were mixed with a small minority strongly disagreeing that standards are suitable.

Some participants from across the Defra Survey and the GfK research felt that the regulations regarding the standards of track kennels should be clearer and more specific with a desire for further detail regarding air ventilation. Of particular note was a suggestion for recommended temperature ranges and ventilation guidance to ensure safe ambience control of the kennels throughout the year. This was regarded as very important to the welfare of greyhounds.

“Kennel matting in some tracks is very poor. During summer, lack of air conditioning has also been encountered likewise in winter month’s damp, unhealthy atmosphere in kennels. Resulting in dogs catching kennel cough.”

“‘Have a temperature suitable for greyhounds which have raced’ is far too woolly.”

5.1 Kennelling outside of the tracks

Many were keen to note that the 2010 welfare regulations only covered kennelling at the track and not outside of it. It was strongly suggested across all participant groups that the regulations should encompass trainer/ owner kennels and that these should be regulated to ensure compliance.

“We want to see the regulations extended to cover trainer’s kennels, where greyhounds spend the significant majority of their time.”

“We would propose that the Regulations be extended to set down specific, minimum standards applicable to all kennelling and related facilities at which greyhounds are kept and trained. These facilities should be inspected and licensed, either by a trainer’s Local Authority, or by a body, accredited by UKAS in relation to the regulation of greyhound training kennels. The improved kennelling regulation must include welfare provision at its heart and cover not only the fabrication of kennels and related facilities but also the competence of staff engaged in the care of the greyhounds and the husbandry standards.”

Condition 3 Summary:

The comments regarding Condition 3 are based on responses to the Defra survey amongst trainers, owners and vets and responses to the GfK research amongst regulated tracks, independent tracks, GBGB, vets, local authorities and trainers/ owners/ breeders.

^{5 5} Please note that these findings from the Defra survey should be treated with caution due to the small sample size (45 responses from trainers and owners who race their greyhounds at GBGB tracks and 16 responses from trainers and owners who race their greyhounds at independent tracks).



- **GBGB tracks already had kennelling in place**, but some made some changes to existing kennel blocks to meet the regulations.
- **Independent tracks typically did not have kennelling before the regulations**; this was a large financial expenditure to put kennelling in place to meet the requirements.
- **Kennels at independent tracks are not always used**, and dogs are sometimes held in a car / van before racing / trialling.
- As part of GBGB guidelines, **kennelling dogs a minimum of 30 minutes prior and 15 minutes after a race was seen as beneficial** to ensure that the greyhound does not have an injury before or after a race, as it is not always immediately apparent.
- **Some felt that greyhounds are kennelled for too long at race tracks**, which could be detrimental to their welfare. Some suggested **double kennelling** as a way of ensuring that dogs are not kennelled for an unnecessary amount of time.
- **Views towards the standards and quality of kennels at tracks were mixed**, with some commenting that the standards were not always upheld or consistent across tracks.
- **Some felt that the regulations regarding the standards of kennels needs to be clearer and more specific**, particularly in relation to air ventilation as temperature control is very important to the welfare of greyhounds.
- **There is strong suggestion across all participant groups for regulation to be extended to cover kennelling outside of tracks** to include trainer/ owner kennels.

6 Condition 4: Identification of greyhounds taking part in races or trials

- 1. An operator may only permit a greyhound to enter a race or a trial if it has been checked to ensure that:**
 - (a) if the greyhound was born on or after the date on which these Regulations come into force, it is identified with an earmark in accordance with this paragraph; and**
 - (b) it is identified with a microchip in accordance with this paragraph.**

- 2. The earmark referred to in sub-paragraph (1a) must:**
 - (a) be a tattoo of a unique number located on the inside of the ear pinnae; and**
 - (b) be registered on a database which the operator reasonably believes meets the requirements set out in Part 2 of this Schedule.**

- 3. The microchip referred to in sub-paragraph (1b) must:**
 - (a) have a unique number;**
 - (b) comply with either ISO standard 11784:1996 or Annex A to ISO standard 11785:1996 of the International Standards Organisation's standards for microchips (a); and**
 - (c) be registered on a database in relation to which the operator reasonably believes the requirements set out in Part 2 of this Schedule are met.**

The comments in this section are based on responses to the Defra survey amongst trainers, owners and vets and responses to the GfK research amongst regulated tracks, independent tracks, GBGB, vets, local authorities, re-homing organisations and trainers/ owners/ breeders.

Overall, views were positive towards permanent identification of greyhounds and resultant improvements to traceability with some citing that this regulation had resulted in the biggest and most positive impact on greyhound welfare. Many commented that most greyhounds in the industry are permanently identified, although there were a few occasions when participants had found this not to be the case.

The research indicated mixed levels of knowledge and awareness regarding the types of information stored on microchips and tattoos, and how this information is recorded and used on databases. A small number of participants believed that the regulations only covered greyhounds at GBGB tracks and not independent tracks suggesting that there is scope to increase awareness of this regulation.

.....
"Microchipping currently only covers dogs that trial or race on GBGB tracks. They are not required for dogs that do not make it to trial or are bred for flapping⁶, therefore these dogs remain under the radar and untraceable."

"Tattooing is useful for ascertaining where the dog has run on licensed tracks, but not unregulated tracks."

.....
When considering the use of microchips and tattoos there were mixed views regarding whether the regulations should require both. For some, having both the microchip and tattoo provided greater

⁶ This refers to licensed independent greyhound tracks

reassurance and reliability of being able to trace a dog. For example, some cited that microchips can de-polarise or move in the dog and that in these situations a tattoo would ensure identification was still possible.

“The more ways there are to keep track of dogs the better. Tattooing identifies the individual dog and its origins; microchipping is following it through its life.”

Indeed some participants noted that the tattoo was often used more frequently than the microchip citing anecdotal instances of difficulties in accessing a scanner outside of the track environment, and problems in accessing information from the microchip database. These two issues make it difficult for organisations and individuals to track and identify dogs outside of the race track.

“The tattoo allows us [welfare organisation] to trace the owner and the dog’s history and age from the central database - most of our dogs come to us from the dog pound with no history. The chip would not give us this information.”

“Greyhounds with earmarking tattoos are more easily identifiable if for instance I was purchasing a dog. Without the earmark I wouldn’t have any knowledge of who the greyhound was as I haven’t got the equipment to read the microchip.”

Whilst it was acknowledged that tattooing did not benefit the welfare of greyhounds as they are painful to administer, some felt that the benefit of the tattoo outweighed this drawback.

“Tattooing is a momentary unpleasant experience for Greyhound pups. However chips can fail like anything else. Not every owner, when selling the dog on, contacts the microchip base.”

A small minority felt that tattooing was not necessary especially in light of the process of marking the dogs. They suggested that microchip technology had improved since its’ introduction, and it should be relatively straight forward to update information on a microchip that would be traditionally assigned to a tattoo therefore negating the need for tattoos.

The key benefit of microchipping cited across the research was easier identification of dogs when attending the track to race and ease of tracing any missing/ lost dogs. However, many felt that the requirement for permanent identification only improved the traceability of a racing greyhound during its career, and not for the retired greyhound or those who never raced. This was typically because this data was not kept up to date and/ or respondents did not have access to the microchip database. With this in mind, participants reflected that the regulation only had limited impact on greyhound welfare.

“There needs to be a full cradle to grave registration system. At present it does seem that once their racing career is over, the dogs drop off the system and their well-being is no longer monitored by the industry.”

A key concern raised by participants was the extent to which microchip databases were kept up to date and provided accessible information. This was a particular concern where a greyhound frequently changed ownership, residence or had retired; many felt that microchip details were not updated with this information. This made it increasingly difficult to trace the current or previous owner or residence, as it was sometimes found that the registered information on the microchip and/or tattoo was outdated or missing. Some suggested the current regulations did not go far

enough to address this issue, and felt that more could be done to ensure data was kept up to date particularly for retired greyhounds.

“Microchipping works as long as owners/adopters update the records when a change occurs. There is no requirement to do this - in fact it costs money - so a lost dog's chip may be recorded to a previous owner and this is useless. The same applies to the tattoos - as long as the records are up to date, then perfect, but whilst there is no incentive to keep them up to date, gaps will occur.”

“Dogs coming into the care of charities are microchipped, however frequently when charities try and change the chip details they find there aren't any details registered to the chip.”

“Failure to update the chip owner details is commonplace, so they (microchips) cannot be relied upon as a means of tracing an owner.”

“It is essential that the microchip details are recorded on a database compliant with the new micro-chipping regulations and those new owners keep their details up to date. We would like the regulations to include a statutory requirement for the owner of a racing greyhound to report its retirement.”

Related to this, those seeking to trace greyhound details via a microchip noted that they had sometimes experienced problems in accessing this information. These participants stated that based on their experience, a racing greyhound's identification details when registered on the GBGB database was not accessible to the public⁷. In some circumstances, participants provided anecdotal examples of approaching GBGB to request microchip details of a retired greyhound to trace the registered keeper/ residence but access was denied due to the Data Protection Act. Others noted that a microchip would be registered to GBGB and not an individual owner/ trainer. By not being able to access these databases publicly, or access owner/ trainer details, participants felt that the use of permanent identification was limited.

“There has undoubtedly been an improvement in identification of greyhounds under the regulations, with micro-chipping of greyhounds a welcome contribution to improving traceability and visibility. It should be supported by a clear, publicly accessible database to identify all dogs. This should be in line with the databases for all dogs that will be registered under the Micro-chipping Regulations in England (and soon in Scotland and Wales). However, there are limits to what micro-chipping will achieve; it is the best identification tool that we have, however it is not a welfare enforcement tool for the individual dog.”

“The microchips are superfluous as they are not registered on any openly accessible database. “

“Many GBGB chips are registered to the GBGB and not an owner/trainer. If we request details of the owner from the GBGB, we are denied access to these details, due to the Data Protection Act.”

⁷ The 2010 Regulations, for purposes of data protection, only require information to be provided by databases to 'authorised third parties'. This is typically the police or a local authority.



Participants noted that linking microchips to a central, public database would be a way to move forward in making information more accessible and preparing for the introduction of dog microchipping laws in 2016⁸.

Overall there was lack of clarity amongst participants regarding what happens to microchip information once a greyhound is retired. Some participants commented that moving details from the GBGB database to a central database was not always done and suggested that one centralised database would contribute towards maintaining up to date identification information in one place.

.....
"We have registered our home kept retired greyhound with the pet databases, but I understand this is not done automatically. It would be better if the databases could share information, so that dogs that are re-homed elsewhere are automatically registered, even if only to the last racing owner."
.....

Those expressing concern regarding the efficacy of the microchip database raised queries regarding the extent to which the database was monitored. It was agreed that further information about checks, especially those to follow-up retired dogs would provide reassurance that welfare of greyhounds when they finish racing was being addressed by the industry. This was of particular importance to participants who felt that the industry lacked transparency for what happened to greyhounds at retirement, and their fate.

.....
"The regulations provide for the establishment of a database recording details of dogs and linking these to their owners. This provision aims to assure traceability which in turn should incentivise owners to make proper provision for their dogs on retirement."
.....

Checks were also seen as a good way of bringing wider accountability and responsibility to the greyhound owners. It was felt that if the regulations stipulated that up to date information was kept and follow up checks were conducted, this would contribute towards the welfare of retired greyhounds in particular, to check their whereabouts once they have left the sport.

.....
"Micro chipping will never be a robust system until the last registered owner on the microchip database is made responsible for the dog."
.....

Condition 4 Summary

The comments regarding Condition 4 are based on responses to the Defra survey amongst trainers, owners and vets and responses to the GfK research amongst regulated tracks, independent tracks, GBGB, vets, local authorities, re-homing organisations and trainers/ owners/ breeders.

- **Views were positive towards the permanent identification of greyhounds**, and many found that greyhounds within the industry are permanently marked, most with a microchip.
- **There were mixed levels of knowledge and awareness regarding permanent identification**; this included aspects such as the types of information stored on micro-chips and tattoos, and how this information is recorded and used on databases.
- **There were mixed views regarding whether the regulations should require both a micro-**

⁸ The Microchipping of Dogs (England) Regulations 2015 do not provide for a central publically accessible database. The 2015 Regulations only typically provide for the police or local authorities to access personal details from compliant databases.



chip and tattoo; although both methods were regarded by some as providing greater reliability in traceability.

- **For some, it was felt that tattooing was no longer necessary as they are painful to administer, and micro-chipping allowed for easier identification of greyhounds** when they attend the race rack and ease of tracing missing / lost dogs.
- **For others, the tattoo was still greatly relied upon** as anecdotal instances of difficulties were cited such as accessing a scanner outside of the track environment and problems in accessing information from the microchip database.
- **The research interviews suggested that many participants felt that permanent identification of greyhounds currently has a limited impact on their welfare;** it was felt that this aspect of the regulations did not address welfare and traceability of retired greyhounds or those who never raced. This was due to the perception that the identification databases and processes only track racing greyhounds throughout their career.
- **One of the key barriers cited across the research of tracing a greyhound relates to database information not being updated;** this makes it increasingly difficult to trace the current / previous owner of a greyhound. Some participants felt that the regulation needs to address the updating of this information
- **Some participants had experienced problems in accessing identification databases,** and therefore felt the use of permanent identification is limited as it impacts on the traceability of greyhounds. Some participants felt that the regulations should address how this information is stored and accessed and expect that the new laws for micro-chipping of dogs in 2016 will impact this.
- **There was concern amongst some regarding the monitoring of database information to ensure the information is correct,** this would provide reassurances regarding the welfare of greyhounds once they have left the sport and to provide accountability and responsibility to greyhound owners



7 Condition 5: Record of greyhounds taking part in races or trials

- 1. An operator must ensure that the following details are recorded in relation to all greyhounds entering a race or a trial at the track:**
 - (a) the name and address of the owner;**
 - (b) the name and address of the trainer;**
 - (c) number on the tattoo if any and microchip; and**
 - (d) the database on which the greyhound's details are recorded.**
- 2. Unless the greyhound is entered for a race or trial by a person carrying photographic identity issued to owners or trainers and their employees by a body meeting the conditions set out in regulation 3 (2), the operator must require owners to produce:**
 - (a) a photographic means of identification as proof of their name and address each time a greyhound belonging to them is entered in a race or trial at that track for the first time under their ownership, and a copy of the means of identification for the operator's records, and**
 - (b) proof that they are registered as owner of that greyhound on a database which the operator reasonably believes meets the requirements set out in Part 2 of this Schedule, and must require trainers to produce a photographic means of identification as proof of their name and address each time a greyhound which is currently trained by them is entered in a race or trial at that track for the first time, and a copy of the means of identification for the operator's records.**
- 3. The details referred to in sub-paragraph (1) must be kept by the operator for at least 10 years from the date of the race.**
- 4. The copies of means of identification referred to in sub-paragraph (2) must be kept for at least the duration of the operator's licence.**

The comments in this section are based on responses to the Defra survey amongst trainers, owners and vets and responses to the GfK research amongst regulated tracks, independent tracks, GBGB, vets, local authorities, re-homing organisations and trainers/ owners/ breeders.

Participants commented that the information stipulated by this regulation is kept across all tracks. However, many participants felt uncertain as to how these records contribute towards greyhound welfare. This was because they lacked information regarding how this data was used and how these records are monitored.

No summary is provided given the short length of this section.

8 Condition 6: Injury records in relation to races, trials, or sales trials

1. When a greyhound is injured when participating in a race, trial or sales trial the attending veterinary surgeon must make a record which the operator must keep at the track, setting out:

- (a) the nature of the injury sustained;**
- (b) either the microchip number or tattoo number of the greyhound if the greyhound is microchipped or tattooed;**
- (c) details of any treatment administered to the greyhound;**
- (d) the distance of the race, trial or sales trial in which the injury occurred; and**
- (e) the date of the injury.**

2. The information referred to in sub-paragraph (1) must be kept for at least 10 years from the date of the injury.

The comments in this section are based on responses to the Defra survey amongst trainers, owners and vets and responses to the GfK research amongst regulated tracks, independent tracks, GBGB, vets, local authorities, re-homings organisations and trainers/ owners/ breeders.

Participants across the research commented that the regulation regarding injury records has had a very limited impact on greyhound welfare and felt that this regulation in particular had the most room for improvement. Many participants commented that although these records are retained across all tracks, there is a discrepancy in how these records are kept. For example, collection of injury data was dependent on the interpretation of 'injury' and some anecdotal evidence indicated that some tracks only record what they regard as 'serious' or 'career-threatening' injuries.

There were also a very small number of examples based on direct experience cited that tracks aimed to manipulate their injury/ euthanasia records – for example, by sending severely injured dogs home.

“They often send badly injured dogs home so injuries don't get recorded correctly”

The research indicated that some would welcome clear guidelines in the regulations to define a standardised method of keeping these records, and what information should be recorded to drive greater consistency in the interpretation of 'injury'. It was agreed that a way forward would be providing further clarification and specific guidance for when to record injury data. This would in turn enable easier cross comparisons across races etc., and therefore data that is more reliable and meaningful when analysed and monitored. It was also noted that improvements to how records are kept (e.g. electronically, with data management functions that would enable tracks to query their injury data over time) would be useful.

“Tracks keeping records of injuries incurred is also welcome but it is meaningless if the information is not standardised or more importantly, acted on to ensure improvements are made.”

Many participants raised concerns relating to the use of injury records, as they believed that this data was not reviewed or monitored in a meaningful way. For many participants, their knowledge and awareness of how this data is reviewed was low, leading to some speculation that this data was not monitored or used to influence track decisions. However, there were a couple of anecdotal

examples from both GBGB and independent tracks where injury records had been monitored and reviewed, and had influenced decisions and changes to factors at the race track. These instances had sometimes been in response to a particular issue, for example, high number of similar injuries, or injury records had been proactively reviewed. There were some suggestions that the regulations should outline how the injury records should be monitored and analysed with a view to having a positive impact on overall injury rates.

“I am not privy to these stats so have no idea if there has been an increase/decrease in injury levels or if there are a significant/negligible number of injuries. I haven't seen any recommendations made to any tracks, based on these stats, by the GBGB.”

One of the key issues raised by many participants across the research related to the lack of published injury records; due to this many found it difficult to determine whether the 2010 welfare regulations overall had led to improved welfare of greyhounds. There was appetite for this data from those involved in both the racing career of greyhounds, and those dealing with retirement. There was a feeling amongst some participants that this lack of transparency within the industry was a core issue with some expressing scepticism for why this might be the case.

“Collating injury stats is an important way of raising welfare and monitoring the impact of the regulations, but because there is no transparency around the statistics or requirement to follow up and address issues raised by the data, then the impact is hard to assess.”

Across the stakeholder groups, many participants noted that they had not previously seen injury data and that in general, many within the industry were unable to access this information. Some were particularly keen to see this data noting that it could help inform their decision on which tracks to attend which could in turn result in industry-generated improvements and competition between tracks to strive for low injury rates.

“No one knows the injury statistics because the GBGB⁹ will not publish them so owners and trainers do not know which tracks are safer.”

“This is one of the most important changes that needs to be made within the industry, if such statistics are available then they need to be made public, to enable people to have a choice where to run there [sic] dogs etc, and it would also force tracks with high rates of injury to make improvements.”

“Currently there is a requirement to collect injury data and hold it for a statutory time which is good, but there is no requirement to use this data to monitor injury rates at tracks and intervene where appropriate.”

However, other participants stated that although the publication of injury figures would be beneficial in order to create transparency in the industry and refuting accusations of ‘sensationalised’ claims, there were potential drawbacks to consider. It was felt that all race tracks would have to record and use their data in a holistic, collective way, otherwise there could be discrepancies in the data, which

⁹ Neither GBGB or independent tracks are required to publish injury statistics under the current regulations.

would therefore become unreliable. Some participants also felt that the requirement to publish data could result in the injury records being manipulated in some way, either in the way they are recorded or the way they are used.

The quantitative review of injury records produced the following result from the 22 RCPA tracks. This data is based on the percentage of dogs raced.

RCPA aggregated data return %					
	2010	2011	2012	2013	2014
Serious injuries	0.17	0.17	0.19	0.19	0.21
Euthanasia	0.13	0.15	0.12	0.13	0.13

As you can see in the table above, the GfK analysis did not record any difference in the proportion of injuries and euthanasias due to serious injury from before the regulations were in place to five years later. This is no doubt because the regulated tracks had vets in place prior to the regulation. There were not sufficient records provided for the research across the years to tell if the regulation had made any difference to the injury statistics of the independent tracks. The two we had data from produced the following limited results.

Independent tracks data return %					
	2010	2011	2012	2013	2014
Serious injuries	No data	No data	0.06%	0.10%	0.16%
Euthanasia	No data	No data	0.48%	0.64%	0.42%

We cannot be certain of data for independent tracks as a whole with only partial information from two operators received. In the interests of completeness and transparency we have included the results here but, given the incomplete nature of the data, have not attempted to draw any conclusions.

8.1 Retirement records

In addition to injury records, some participants expressed desire for publication of retirement records noting that regulations did not cover data collected by greyhound retirement forms. Some participants felt that publication of these records would help support transparency of the welfare of greyhounds across the life course.

.....
 "The statutory requirements do not include retirement provisions or the requirement to track greyhounds from birth to death."



“Without statistical transparency it is hard to assess what happens to greyhounds when they retire from racing.”

“In order to accurately monitor and improve the welfare conditions for greyhounds it is essential that rescue and welfare organisations along with Government bodies have access to correct and current data. Without access to this information, welfare organisations must currently resort to educated guess work in order to ascertain the number of greyhounds currently leaving the industry and their retirement fates.”

Condition 6 Summary

The comments regarding Condition 6 are based on responses to the Defra survey amongst trainers, owners and vets and responses to the GfK research amongst regulated tracks, independent tracks, GBGB, vets, local authorities, re-homings organisations and trainers/ owners/ breeders.

- **Overall, many participants felt that the regulation regarding injury records has had a very limited impact on greyhound welfare and had the most room for improvement.** This was due to reported discrepancies in how the records are kept, with anecdotal examples indicating that the interpretation of an ‘injury’ - and therefore whether an injury was recorded - was **open to interpretation** and therefore could be varied.
- **Many participants believed that injury data was not reviewed or monitored**, this was mainly due to many feeling that changes and improvements had not been made to the race track as a result.
- **A key issue amongst many participants related to the perceived lack of published injury records** and as many had not seen injury data they felt unable to comment on the true extent of the impact on greyhound welfare or felt that data was not published as the industry had ‘something to hide’.
- **Some participants would particularly like to have access to injury data** as they felt that publishable data would help to create competition amongst tracks to strive for low injury rates.
- **However, some felt that the publication of injury data could have some potential disadvantages such as the records being manipulated**, such as the way they are recorded or used.
- **Some participants expressed desire for publication of retirement records** as they felt this would help support transparency of the welfare of greyhounds across the life course.



9 Guidance

Guidance for Independent Track Operators was published in February 2010 to assist independent greyhound tracks in meeting the standards required by the regulations

The comments in this section are based responses to the GfK research amongst independent tracks, local authorities and those associated with independent tracks.

For independent track operators, there was mixed awareness and use of this guidance. For those with higher levels of awareness and knowledge of this guidance, they felt it was valuable and was used. For those with lower levels of awareness, this was usually due to factors such as not being within the job role for very long. These participants therefor could not comment on how valuable they felt the guidance was.

No summary is provided given the short length of this section.

10 Regulation

The GBGB are allowed to regulate the standards at GBGB tracks due to their UKAS accreditation; whereas standards at independent tracks are regulated by the local authority.

The comments in this section are based on responses to the Defra survey amongst trainers, owners and vets and responses to the GfK research amongst regulated tracks, independent tracks, GBGB, vets, local authorities, re-homing organisations and trainers/ owners/ breeders.

Overall there were mixed views regarding the role of GBGB and local authorities in regulating the industry. It was noted that GBGB have expert industry knowledge whereas local authorities typically do not. This was because local authority officers tended to have been in the job role for a short period of time, and were not dedicated greyhound experts. This raised some concerns regarding regulation of independent tracks and some further suggested that they are inspected less frequently than GBGB regulated tracks.

“Our experience has been that the tracks regulated and inspected by GBGB are generally monitored more regularly and more effectively than those under Local Authority control. There is no specific training given to Local Authority inspectors, who traditionally only monitor tracks roughly once every three years. We would like these inspectors to perform to the same standard as the UKAS-accredited inspections carried out by GBGB.”

Many participants expressed desire for consistent regulation across both GBGB regulated tracks, and Local Authority regulated tracks suggesting that this would promote greater consistency of welfare for greyhounds.

“It is imperative to have the same standard of welfare for all greyhounds therefore one regulator should be in place for both GBGB and Independent tracks to ensure consistent industry-wide inspection and licensing.”

“Regulation of welfare standards for GBGB and independent tracks should be the same. Standards for the welfare of a greyhound should not differ between a regulated and non-regulated track.”

Some further raised queries regarding the independence of GBGB regulation. With this in mind, some reflected that local authorities have the potential to be more independent from the industry when compared to GBGB.

Key issues regarding the independence of GBGB regulation often focused on concerns regarding self-regulation; many queried whether the self-regulating industry could be regulated as stringently as an independent regulator.

“As long as GBGB, for instance, are self-regulating, they will always be striving to protect their own interests.”

“Welfare can only improve if the self-regulated status of the sport is removed and responsibility put into the hands of independent bodies who do not have a vested interest in the sport.”

UKAS accreditation was valued as a core regulatory tool with many commenting positively on the frequency of inspections. However, not all participants felt that UKAS accreditation went far enough to support the welfare of greyhounds. Participants did not offer tangible examples of criticism regarding UKAS accreditation. However, some noted that whilst UKAS accreditation did provide independent review of GBGB processes and standards, it did not go far enough in setting the content of the regulations to inform welfare improvements. These participants noted that UKAS accreditation could only go as far as ensuring GBGB enforced the standards in the regulations without providing a review of the data actually gathered¹⁰; many felt meant that the record keeping requirements of the regulations were therefore met, but the records were not reviewed or used to ensure consistency or welfare, or make further improvements to welfare.

“UKAS accreditation is a formal, third party recognition of competence to perform specific tasks. However it is the specified tasks that are important, if these tasks do not relate to greyhound welfare or address greyhound welfare issues then UKAS accreditation cannot be said to be effective in terms of protecting and improving greyhound welfare. For example while UKAS accreditation can check that records are being kept of racing greyhound injuries on the track, it does not review that data to identify potential issues or ensure that the industry is reviewing the data and addressing issues, it is merely a tick box to say that procedures/tasks are being followed correctly. Therefore UKAS Accreditation is not the answer in terms of improving greyhound welfare.”

It was clear across the research that lack of transparency regarding regulation data and outcomes was a key driver of lack of trust in GBGB independence. With this in mind participants suggested further information and reassurances regarding how regulation is carried out. Publication of data was seen as a core way to provide this information and enable people to track the impact of the regulations and how they are enforced.

Some participants also raised concerns regarding the outcomes for tracks found not to be adequately following or meeting regulations regarding the welfare of the dogs racing. Some cited anecdotal examples of punitive measures not being fully enforced or minor reprimands or penalties being put in place for major misconducts such as breaching track regulation for dog fitness to race. This reinforced perceptions that GBGB regulation lacked independence.

10.1 Wider regulatory reach

Some participants – from across stakeholder groups - felt that the current scope of the Regulations did not go far enough, and should encompass trainer/ owner kennels. These participants sought greater transparency regarding the current checks carried out and the outcomes for those found to be in violation of regulations.

It was also suggested that a joined up approach to regulation across UK and Ireland could focus on breeding as an additional area where some felt the welfare of greyhounds could be improved.

¹⁰ UKAS standards reflect those set out in the 2010 Regulations, which do not require activities such as reviewing data.



Regulation Summary

The comments regarding regulation are based on responses to the Defra survey amongst trainers, owners and vets and responses to the GfK research amongst regulated tracks, independent tracks, GBGB, vets, local authorities, re-homing organisations and trainers/ owners/ breeders.

- **Overall, views were mixed regarding the role of GBGB and local authorities in regulating the industry.** It was noted that **GBGB have industry knowledge** whereas local authorities typically do not. This was because local authority officers tended to have been in the job role for a short period of time, and were not dedicate greyhound experts.
- **Many expressed a desire for consistent regulation** across GBGB regulated and local authority regulated tracks to promote greater consistency of welfare for greyhounds.
- **Some concerns were raised regarding the independence of GBGB regulation** and many queried whether the self-regulating industry could be regulated as stringently as an independent regulator.
- **UKAS accreditation was valued as a core regulatory tool** with many commenting positively on the frequency of inspections. However, some participants felt it **did not go far enough to support the welfare of greyhounds.**
- **The lack of transparency regarding regulation data and outcomes was a key driver of lack of trust in GBGB independence** and the publication of data was seen as a core way to provide further information and reassurances regarding how regulation is carried out.
- **Some also raised concerns regarding the outcomes for tracks found not to be adequately following or meeting regulations** which reinforced perceptions that GBGB regulation lacked independence.
- **Some felt that the regulatory reach should encompass trainer / owner kennels** and sought greater transparency regarding the current checks carried out and outcomes for those found to be in violation of the regulations.
- **It was suggested that a joined up approach to regulation across UK and Ireland could focus on breeding** as an additional area where some felt the welfare of greyhounds could be improved.

11 Summaries

Condition 1: Attendance of a veterinary surgeon

- Many participants from across the stakeholder responses from both the Defra survey and GfK research felt that veterinary attendance at the race track and pre-race checks has a positive impact on greyhound welfare with veterinary expertise identifying whether a dog is fit to race.
- Veterinary presence was already required at GBGB tracks, therefore it was felt to have a limited impact since the regulations. Whilst vets had been present at these tracks before, the regulation had formalised this requirement, reinforcing that it is an important provision. A small number commented that the regulations now ensured a vet was present at all times during a race, trial or sales trial.
- Independent tracks typically did not employ a vet before the regulations; and this is usually one of their largest and most regular financial outlays to meet the regulations
- Some participants from across the stakeholder responses from both the Defra survey and GfK research felt that the quality of pre-race checks was not consistent across all tracks. Additionally, some participants felt that pre-race checks were too brief with very limited time for the vet to inspect each dog and a small number felt track vets were not sufficiently qualified to inspect a racing animal.
- It was reported that all tracks (GBGB and independent) keep and sign a register of vet attendance; however there was uncertainty of how often this register was monitored and therefore to what extent it contributed towards the monitoring of greyhound welfare.

Condition 2: Facilities for the attending veterinary surgeon

- Many considered the provision of vet facilities to have had a positive impact on greyhound welfare as it ensures that greyhounds can be treated accordingly at the track.
- Many GBGB tracks provided veterinary facilities before the regulations came into force, but a lot had to make some changes when the regulations came in to ensure that these were met.
- Typically independent tracks had to provide veterinary facilities when the regulations came in to force, as these were not provided beforehand
- Anecdotal evidence suggested that hygiene standards of vet facilities at some tracks were not always maintained, there is a perceived lack of consistency across tracks.
- For some, veterinary independence from the race track was spontaneously mentioned as it could reduce the potential for influence on vet decisions, and also provide an independent standpoint and expertise for the industry.
- There were mixed views regarding the role of greyhound specific veterinary qualifications efficacy; some participants felt that these qualifications would make the vet seem more credible in conducting their work and knowledgeable when making decisions. However, some participants felt that due to the nature of the job it is already difficult for tracks to recruit vets, and requiring further qualifications could make recruitment even more challenging.
- Some felt that track vets' expertise and knowledge should be utilised more often, as this would contribute further towards greyhound welfare, such as being part of the decision making process regarding track safety and kennel conditions

Condition 3: Kennels

- GBGB tracks already had kennelling in place, but some made some changes to existing kennel blocks to meet the regulations.
- Independent tracks typically did not have kennelling before the regulations; this was a large financial expenditure to put kennelling in place to meet the requirements.



- Kennels at independent tracks are not always used, and dogs are sometimes held in a car / van before racing / trialling.
- As part of GBGB guidelines, kennelling dogs a minimum of 30 minutes prior and 15 minutes after a race was seen as beneficial to ensure that the greyhound does not have an injury before or after a race, as it is not always immediately apparent.
- Some felt that greyhounds are kennelled for too long at race tracks, which could be detrimental to their welfare. Some suggested double kennelling as a way of ensuring that dogs are not kennelled for an unnecessary amount of time.
- Views towards the standards and quality of kennels at tracks were mixed, with some commenting that the standards were not always upheld or consistent across tracks.
- Some felt that the regulations regarding the standards of kennels needs to be clearer and more specific, particularly in relation to air ventilation as temperature control is very important to the welfare of greyhounds.
- There is strong suggestion across all participant groups for regulation to be extended to cover kennelling outside of tracks to include trainer/ owner kennels.

Condition 4: Identification of greyhounds taking part in races or trials

- Views were positive towards the permanent identification of greyhounds, and many found that greyhounds within the industry are permanently marked, most with a microchip
- There were mixed levels of knowledge and awareness regarding permanent identification; this included aspects such as the types of information stored on micro-chips and tattoos, and how this information is recorded and used on databases.
- There were mixed views regarding whether the regulations should require both a micro-chip and tattoo; although both methods were regarded by some as providing greater reliability in traceability.
- For some, it was felt that tattooing was no longer necessary as they are painful to administer, and micro-chipping allowed for easier identification of greyhounds when they attend the race rack and ease of tracing missing / lost dogs.
- For others, the tattoo was still greatly relied upon as anecdotal instances of difficulties were cited such as accessing a scanner outside of the track environment and problems in accessing information from the microchip database.
- The research interviews suggested that many participants felt that permanent identification of greyhounds currently has a limited impact on their welfare; it was felt that this aspect of the regulations did not address welfare and traceability of retired greyhounds or those who never raced. This was due to the perception that the identification databases and processes only track racing greyhounds throughout their career.
- One of the key barriers cited across the research of tracing a greyhound relates to database information not being updated; this makes it increasingly difficult to trace the current / previous owner of a greyhound. Some participants felt that the regulation needs to address the updating of this information
- Some participants had experienced problems in accessing identification databases, and therefore felt the use of permanent identification is limited as it impacts on the traceability of greyhounds. Some participants felt that the regulations should address how this information is stored and accessed and expect that the new laws for micro-chipping of dogs in 2016 will impact this.
- There was concern amongst some regarding the monitoring of database information to ensure the information is correct, this would provide reassurances regarding the welfare of greyhounds once they have left the sport and to provide accountability and responsibility to greyhound owners



Condition 5: Record of greyhounds taking part in races or trials

- Participants commented that these records are kept across all tracks
- Many felt uncertain as to how these records contribute towards greyhound welfare, this was due to participants not knowing how or if these records are monitored

Condition 6: Injury records in relation to races, trials, or sales trials

- Overall, many participants felt that the regulation regarding injury records has had a very limited impact on greyhound welfare and had the most room for improvement. This was due to reported discrepancies in how the records are kept, with anecdotal examples indicating that the interpretation of an 'injury' - and therefore whether an injury was recorded - was open to interpretation and therefore could be varied.
- Many participants believed that injury data was not reviewed or monitored, this was mainly due to many feeling that changes and improvements had not been made to the race track as a result.
- A key issue amongst many participants related to the perceived lack of published injury records and as many had not seen injury data they felt unable to comment on the true extent of the impact on greyhound welfare or felt that data was not published as the industry had 'something to hide'.
- Some participants would particularly like to have access to injury data as they felt that publishable data would help to create competition amongst tracks to strive for low injury rates.
- However, some felt that the publication of injury data could have some potential disadvantages such as the records being manipulated, such as the way they are recorded or used.
- Some participants expressed desire for publication of retirement records as they felt this would help support transparency of the welfare of greyhounds across the life course.

Guidance for independent track operators

- There was mixed awareness and use of independent track operator guidance.
- For those with higher levels of awareness and usage, this guidance was felt to be valuable
- For those with lower levels of awareness and usage, this was usually due to factors such as not being within the job role for very long

Regulation

- Overall, views were mixed regarding the role of GBGB and local authorities in regulating the industry. It was noted that GBGB have industry knowledge whereas local authorities typically do not. This was because local authority officers tended to have been in the job role for a short period of time, and were not dedicated greyhound experts.
- Many expressed a desire for consistent regulation across GBGB regulated and local authority regulated tracks to promote greater consistency of welfare for greyhounds.
- Some concerns were raised regarding the independence of GBGB regulation and many queried whether the self-regulating industry could be regulated as stringently as an independent regulator.
- UKAS accreditation was valued as a core regulatory tool with many commenting positively on the frequency of inspections. However, some participants felt it did not go far enough to support the welfare of greyhounds.
- The lack of transparency regarding regulation data and outcomes was a key driver of lack of trust in GBGB independence and the publication of data was seen as a core way to provide further information and reassurances regarding how regulation is carried out.



- Some also raised concerns regarding the outcomes for tracks found not to be adequately following or meeting regulations which reinforced perceptions that GBGB regulation lacked independence.
- Some felt that the regulatory reach should encompass trainer / owner kennels and sought greater transparency regarding the current checks carried out and outcomes for those found to be in violation of the regulations.
- It was suggested that a joined up approach to regulation across UK and Ireland could focus on breeding as an additional area where some felt the welfare of greyhounds could be improved.

Annex: Defra Survey Questions

Review of the Racing Greyhounds Legislation

Welfare organisations:

Please detail any changes to the welfare of racing greyhounds observed by you or your organisation which could be attributed to the regulations? (e.g. changes in the number of greyhounds being rehomed or abandoned). If you have not observed any changes then please note this here

Based on your experience, to what extent has the requirement to permanently identify racing greyhounds (i.e. through microchipping as well as tattooing) improved the welfare of racing greyhounds?). Please give examples to support your response.

Based on your experience is there a rationale for maintaining the tattooing requirement as well as the microchipping requirement? Please give examples to support your response.
microchipping and tattooing

Taken collectively, to what extent do you think that the racing greyhounds regulations introduced in 2010 have improved the welfare of racing greyhounds.

- A. At tracks
- B. When not at the track (but still active racers)
- C. After they have left racing (Please provide details to support your response).

Based on your experience, to what extent do you consider the exemption from local authority licensing for tracks regulated by a body with UKAS accreditation for the standards contained in the Regulations (i.e. the GBGB) been effective? Please provide examples to support your response.

Would you support further action to improve the welfare of racing greyhounds? Please provide detail to support your answer

If you have any Evidence you feel should be included in the review (for example, the number of animals rehomed by your organisation before and after the regulations or the number of substantiated complaints you have received) Please upload it here

Greyhound Trainers and Owners

Which of the following apply to you (tick all that apply)
Multiple choice checkboxes (Required)

Please select all that apply

- Racing greyhound owner
- Racing greyhound trainer
- Racing greyhound breeder

At which of the following types of track do the dog(s) you own or train usually race?
(Required)

Please select only one item

- GBGB track
- Independent track
- Both

Trainers and Owners Veterinary Presence and Kennelling - Independent Tracks

Which of the following statements best reflects your opinion:

Multiple choice checkboxes (Required)

Please select all that apply

- The requirement for veterinary presence associated with the legislation has improved the welfare of the dogs which I breed, own, and/or train.
- The requirement for veterinary presence associated with the legislation has made no difference to the welfare of dogs which I breed, own and/or train.
- The requirement for veterinary presence associated with the legislation has had a negative impact on the welfare of the dogs which I breed, own, and/or train.

Please provide detail to support your answer

Which of the following statements best reflects your opinion:

Multiple choice checkboxes (Required)

Please select all that apply

- The requirement for pre-race inspection associated with the legislation has improved the welfare of the dogs which I breed, own, and/or train.
- The requirement for pre-race inspection associated with the legislation has made no difference to the welfare of the dogs which I breed, own, and/or train.
- The requirement for pre-race inspections associated with the legislation has had a negative impact to the welfare of the dogs which I breed, own, and/or train.

Please provide detail to support your answer

Condition 3 of the Licensing Conditions sets out the standards for the kennels. Please see the extract from the guidance provided below. Do you agree that these standards are suitable?

Extract from The Welfare of Racing Greyhounds 2010 guidance

Condition 3: Kennels

This condition is applicable to race meetings and trials. It is not applicable to sales trials.

Providing Kennels

From 6 April 2013, there should be enough kennels provided to ensure there are kennels available for at least every 1 in 5 greyhounds that are present at the track for a race or trial. For example – where 56 greyhounds are present then 12 kennels must be provided. Where 61 greyhounds are present, 13 kennels must be provided.

Track operators will need to be able to demonstrate to their local authority that they are providing sufficient kennels for the number of greyhounds that run at the track. This can be done by reference to the records kept to fulfil Condition 5 (below) that requires records of all greyhounds running at the track to be kept. For example, if a track provides 15 kennels then the records kept to meet Condition 5 should confirm that no more than 75 greyhounds took part in any one race meeting or trial. Similarly, race cards can be used to confirm the number of greyhounds that took part in a race meeting.

From 6 April 2013 kennels must:



- be internally at least 136cm long, 87 cm wide and 110 cm high (although any kennels installed before 6 April 2010 will not have to meet this size requirement.)
- be occupied by no more than one greyhound at a time;
- have floors and walls with a cleanable surface;
- be cleaned between individual greyhounds (i.e. any waste removed);
- be disinfected and dried between race meetings, trials and sales trials;
- have a comfortable area for a greyhound to lie;
- have adequate lighting within the paddock area;
- allow a greyhound to be observed when inside;
- be constructed to minimise risk of injury to a greyhound;
- have a regular flow of clean air to allow sufficient ventilation;
- have a temperature suitable for greyhounds just raced

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree.

Please provide details to support your answer

I use the kennelling provided at independent tracks:

Please select only one item

- At every race
- Regularly
- Occasionally
- Never
- There is no kennelling currently provided on at the track(s) where I race.

To what extent do you agree or disagree with the following statement? In general, the requirement to provide kennelling for 20% of dogs at all tracks (including independent tracks) has improved the welfare of greyhounds at tracks.

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree.

Please provide details to support your answer

Trainers and Owners Veterinary Presence and Kennelling - GBGB tracks

Which of the following statements best reflects your opinion:

Multiple choice checkboxes (Required)

Please select all that apply

- The requirement for veterinary presence associated with the legislation has improved the welfare of the dogs which I breed, own, and/or train.
- The requirement for veterinary presence associated with the legislation has made no difference to the welfare of dogs which I breed, own and/or train.
- The requirement for veterinary presence associated with the legislation has had a negative impact on the welfare of the dogs which I breed, own, and/or train.

Please provide detail to support your answer

Which of the following statements best reflects your opinion:
Multiple choice checkboxes (Required)

Please select all that apply

- The requirement for pre-race inspection associated with the legislation has improved the welfare of the dogs which I breed, own, and/or train.
- The requirement for pre-race inspection associated with the legislation has made no difference to the welfare of the dogs which I breed, own, and/or train.
- The requirement for pre-race inspections associated with the legislation has had a negative impact on the welfare of the dogs which I breed, own, and/or train

Please provide detail to support your answer

Condition 3 of the Licensing Conditions sets out the standards for the kennels. Please see the extract from the guidance provided below. Do you agree that these standards are suitable?

Extract from Guidance to The Welfare of Racing Greyhounds Regulations 2010

Condition 3: Kennels

This condition is applicable to race meetings and trials. It is not applicable to sales trials.

Providing Kennels

From 6 April 2013, there should be enough kennels provided to ensure there are kennels available for at least every 1 in 5 greyhounds that are present at the track for a race or trial. For example – where 56 greyhounds are present then 12 kennels must be provided. Where 61 greyhounds are present, 13 kennels must be provided.

Track operators will need to be able to demonstrate to their local authority that they are providing sufficient kennels for the number of greyhounds that run at the track. This can be done by reference to the records kept to fulfil Condition 5 (below) that requires records of all greyhounds running at the track to be kept. For example, if a track provides 15 kennels then the records kept to meet Condition 5 should confirm that no more than 75 greyhounds took part in any one race meeting or trial. Similarly, race cards can be used to confirm the number of greyhounds that took part in a race meeting.

From 6 April 2013 kennels must:

- be internally at least 136cm long, 87 cm wide and 110 cm high (although any kennels installed before 6 April 2010 will not have to meet this size requirement.)
- be occupied by no more than one greyhound at a time;
- have floors and walls with a cleanable surface;



- be cleaned between individual greyhounds (i.e. any waste removed);
- be disinfected and dried between race meetings, trials and sales trials;
- have a comfortable area for a greyhound to lie;
- have adequate lighting within the paddock area;
- allow a greyhound to be observed when inside;
- be constructed to minimise risk of injury to a greyhound;
- have a regular flow of clean air to allow sufficient ventilation;
- have a temperature suitable for greyhounds just raced.
- Single choice radio buttons (Required)

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

Please provide details to support your answer

Trainers and owners -all

Which of the following statements best reflects your opinion. Please consider the whole life-course of greyhounds, including after they have left racing :

Please select all that apply

- The requirement to micro-chip all dogs has led to an improvement in the welfare of racing greyhounds throughout the life-course
- On balance, the requirement to micro-chip all dogs has made no difference to the welfare of racing greyhounds throughout the life-course
- The requirement to micro-chip all dogs has had a negative impact on the welfare of racing greyhounds throughout the life-course

Please provide details to support your answer

To what extent do you agree or disagree with the following statement? The requirement to keep records of greyhounds that race or trial has led to improvements in the welfare of greyhounds throughout their whole life-course, including after they have left racing .

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree.

To what extent do you agree or disagree with the following statement? The requirement to keep records of greyhounds injured during a race, trial or sales trial has led to welfare improvements at the tracks where you race.

Single choice radio buttons (Required)

Please select only one item

- Strongly agree

- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree.

Please provide details to support your response

To what extent do you agree or disagree with the following statement? Given the requirement to microchip, there is no longer a need for a separate requirement to tattoo racing greyhounds.

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree.

Please provide detail to support your response

Taken collectively, how much, if at all, do you think that the racing greyhounds regulations introduced in 2010 have improved the welfare of racing greyhounds throughout and after their racing career?

Please select only one item

- Improved a lot
- Improved a little
- Made no difference
- Made it worse

Would you support further action to improve the welfare of racing greyhounds? Please provide detail to support your answer.

Impacts of the regulations (business organisations and others)

What, if any, impacts have the regulations had on your business or that of your members (please provide detail of both positive and/or negative impacts observed).

To what extent do you think that the regulations have improved the welfare of racing greyhounds:

- At tracks
- B. When not at the track (but still active racers)
- C. After they have left racing (Please provide detail to support your response).

Do you believe any further action to improve the welfare of racing greyhounds is required? Please provide details to support your answer.