



THE ASSOCIATE PARLIAMENTARY
GROUP FOR ANIMAL WELFARE

The welfare of greyhounds

**Report of the APGAW inquiry into
the welfare issues surrounding
racing greyhounds in England**

May 2007

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MEMBERSHIP OF THE INQUIRY



Members of the inquiry at College Green with some rescued greyhounds from Battersea Dogs Home. Pictured (from left to right) are: Rt Hon the Lord Bradley, Ali Evans (Battersea Dogs and Cats Home), Dr. Nick Palmer MP, Mr. Eric Martlew MP, Mr. Russell Brown MP, Ellie Richmond (Battersea Dogs and Cats Home), Mr. Harry Cohen MP, Mr. Andrew Rosindell MP and rescued greyhounds Benny and Sonny.

The following MPs and Peers sat on the inquiry:

- The Lord Beaumont of Whitley
- Rt. Hon the Lord Bradley
- Mr. Russell Brown MP
- Mr. Harry Cohen MP
- The Baroness Golding
- The Lord Hoyle
- Mr. Alan Meale MP
- Dr. Nick Palmer MP
- Mr. Andrew Rosindell MP
- Ms. Theresa Villiers MP

Chair: Mr. Eric Martlew MP

All political members of the Associate Parliamentary Group for Animal Welfare (APGAW) were sent a letter inviting them to participate. Although the aim was to ensure a balance of membership from both Houses and from all parties, membership of the inquiry ultimately depended on who volunteered to participate. Finally, three out of the ten members were put forward by the All Party Parliamentary Greyhound Group which is associated with the Greyhound racing industry rather than purely with welfare concerns.

The Chair was concerned that the inquiry's final recommendations should have a fair chance of being implemented. The aim therefore was to ensure that

major stakeholders from both welfare organisations and industry bodies were involved in the process. To this end, two special advisers were appointed, one representing the perspective of a welfare organisation and one representing welfare interests from the perspective of an industry representative. In addition the APGAW Secretariat was asked to provide an impartial service coordinating the process of the inquiry.

Funding for the preparation and publication of this report was received from the Royal Society for the Prevention of Cruelty to Animals (RSPCA) and the British Greyhound Racing Fund (BGRF). The Associate Parliamentary Group for Animal Welfare would like to extend their thanks to the RSPCA, the BGRF and the British Greyhound Racing Board (BGRB) for the financial and technical support which has enabled this report to be produced. The committee would like in particular to acknowledge the tremendous assistance received from Becky Blackmore (RSPCA), Peter Laurie (BGRB) and Cassie Hague (APGAW Secretary).

More details about the Associate Parliamentary Group for Animal welfare can be found in the body of the report. APGAW is not a Select Committee and this report should not be regarded as a Select Committee report.



EXECUTIVE SUMMARY

Membership and methods of the inquiry

- The inquiry was set up in August 2006 following revelations in the *Sunday Times* regarding the untimely death of retired greyhounds in Seaham, County Durham.
- The inquiry is made up of seven MPs and four Peers including the Chair, Eric Martlew MP for Carlisle.

General

- We consider that well-regulated greyhound racing can be entirely consistent with good greyhound welfare
- The events that were uncovered at Seaham represent a major failing for the regulation of the greyhound industry. The industry has, however, responded swiftly to Seaham in terms of both punishing the offenders and accelerating measures to improve welfare within the industry.
- This inquiry was called in the belief that due to the public outcry caused by Seaham and the recent introduction of the Animal Welfare Act, there is currently a unique window of opportunity to improve welfare in greyhound racing.
- Throughout this report, where recommendations are directed at regulation, they refer to a “regulatory body of the greyhound industry.” This should be taken to refer to any body which currently regulates the industry or any body which may regulate the greyhound industry in the future.
- British racing is currently divided into two sectors – one which is regulated by the National Greyhound Racing Club (NGRC) and one which consists of unregulated independent tracks.
- We welcome Defra's Animal Welfare Act 2006 and believe it will bring substantial improvement in the welfare of all animals including greyhounds. Defra has plans to introduce secondary legislation under the Act relating to greyhound racing in England to come into effect in April of 2009 at the latest. We hope that the following recommendations will be useful to Defra, the Welsh Assembly Government and to all those involved in greyhound racing and greyhound welfare.

Number of greyhounds involved in the industry

- It must be a matter of extreme priority for the industry to improve its tracking of dogs.
- At the present time there are enormous gaps in industry records of numbers of dogs and there are varying estimations about the exact numbers of greyhounds currently associated with the greyhound racing industry.
- All figures below can therefore only be regarded as conjecture and can give only an indication of the current situation

Breeding

- Approximately 75 per cent of dogs racing in England were bred in Ireland.
- Figures suggest that between 2002 and 2004, an average of 2,478 British bred dogs were earmarked by the NGRC but never made it to NGRC tracks. There will be a much larger number of dogs that are bred to supply the British market in Ireland but are never registered for NGRC racing.
- A small number of these young dogs may go on to race only on independent tracks and a number may be rehomed. However, in the absence of any evidence to the contrary, we must assume that a significant number of these youngsters are destroyed each year.
- The issue of what happens to young greyhounds who do not make it to the track remains a serious area of concern to members of the inquiry.

Racing

- Recent figures suggest there are approximately 11,000 greyhounds are registered in any given year on licensed (NGRC) tracks.
- A recent study of independent tracks suggested that there were approximately 4,000 dogs racing on such tracks in England and Wales. However since this time several independent tracks have closed down and so the true figure is likely to be much less than this.



- Many dogs, contrary to NGRC rules, may race on both NGRC and independent tracks. One independent track estimated that this may amount to 20 per cent of their dogs. Up to 800 greyhounds therefore may be racing on both NGRC and independent tracks.

Retiring

- According to the NGRC, approximately 11,000 registered greyhounds leave racing each year. There is an additional number of dogs that retire from independent tracks but no reliable figures exist for this.

Returning to Ireland

- We recommend that Defra should investigate the number of dogs that are being transported in both directions between Ireland and England as well as the conditions under which those dogs are being transported.

Unwanted dogs

- The regulated greyhound racing industry produces, at a minimum, a 'surplus' of 13,478 dogs in England and Wales each year. There will be an additional number of unwanted dogs produced by the independent sector.

What happens to Unwanted dogs?

- We know that the Retired Greyhound Trust (RGT) rehomes approximately 3,500 dogs per year and independent charities may rehome an additional 1,500
- We recommend that all rehoming charities should consider reporting the identification numbers of those dogs they rehome so that a better idea could be obtained for the number of dogs the different welfare organisations are rehoming.
- Estimates suggest that up to 3,000 dogs may be retained as pets or kept in kennels
- 759 greyhounds were listed as returned to Ireland on NGRC retirement forms in 2005. However, it is not possible for the NGRC to check this information and it may be that some of these dogs may have been destroyed rather than returned to Ireland.

- Under these figures a minimum of 4,728 dogs are unaccounted for each year and we can assume that the majority of these dogs are destroyed. However, this figure does not account for dogs from independent racing or those which are bred for the British racing industry in Ireland. These figures must therefore be regarded as conjectural and are likely to be a significant underestimation of the true scale of the problem of unwanted dogs being destroyed.

Retirement and euthanasia

- We recommend that euthanasia should only be considered as a last resort where it is in the best welfare interests of the animal because of serious injury or where the dog is unsuitable as a pet.
- We recommend that secondary legislation should make it illegal for a registered greyhound to be put down by anyone other than a vet except in exceptional circumstances where there is an unacceptable level of suffering and a vet is unavailable.
- We recommend that a regulatory body of the greyhound industry is enabled to impose heavy sanctions on greyhound trainers and owners who do not register their greyhounds' retirement and that these sanctions are strictly and consistently imposed.

Measures to reduce number of unwanted dogs

- The single biggest measure that needs to be taken is to find a system which matches the number of dogs allowed into the industry with the numbers that can be rehomed at the end of their racing career.

Increasing re-homing

- We recommend that all greyhound tracks, as a condition of their licence, include an associated rehoming scheme and that, at a minimum, this scheme aims to rehome a large percentage of the dogs principally racing on that track. In the long term, it would be ideal if the associated rehoming scheme were able to rehome all dogs retiring from principally running on its associated track at a high standard and without compromising dog welfare.



- The inquiry recommends that funding to the RGT and to independent rehoming centres is increased.

Breeding

- The inquiry accepts that neither the industry nor the Government may be able to restrict breeding under EU trade laws. However measures need to be taken as a matter of urgency to reduce the demand for greyhound pups.
- We recommend that Defra engage with the Irish authorities over possible joint initiatives to tackle a number of issues arising from this report including over-breeding and transportation of greyhounds
- We recommend that all breeders and their premises should be registered if not licensed by the industry's regulatory body and should be regularly inspected (Commercial dog breeders should already be licensed and inspected under the Breeding and Sale of Dogs (Welfare) Act 1999)

Re-organising the racing calendar and increasing the racing life of greyhounds

- We recommend that the racing calendar is re-organised in order to require fewer dogs. This could result in each individual dog racing less often and having an increased likelihood of enjoying a longer racing career. This could be offset by measures to increase the numbers of veteran and handicapped races and financial incentives should be introduced to ensure the popularity of such races. We would also welcome some industry research into the effect of reducing the frequency of racing on the length of a dog's racing career.
- We recommend that individual greyhounds should not be permitted to race any more than three times in any seven day period.
- We recommend that the registration fee is significantly increased (at least doubled) immediately and that a proportion of this increase is used to boost funds allocated to the Retired Greyhound Trust and other rehoming charities. However, it would need to be clearly understood that payment of an increased registration fee would not allow owners or trainers to relinquish any responsibility for their dog when it retired.

It would also need to be clearly understood that this money would provide an addition to existing welfare monies and not a replacement for those monies.

- The level of the registration fee should be regularly reviewed. In the long term we suggest that the industry investigate the possible effects of introducing a much larger registration fee which could be kept as a dowry and returned to the owner on evidence being received that their dog had been treated humanely at the end of its racing career.

The racing life of a greyhound

Inspections

- We recommend that tracks and trainers' kennels must continue to be regularly inspected to ensure high welfare standards. This inspection should be monitored and should be undertaken by inspectors who are independent and have no commercial interest in the premise under inspection. The body that undertakes and oversees these inspections should be accredited by a national accreditation body such as the United Kingdom Accreditation Service (UKAS)).
- As part of the extended co-operation between industry and welfare groups, we envisage reputable welfare groups having access to tracks and being encouraged to attend race days.
- We recommend that the current regulatory body increase its number of Stipendiary Stewards as a matter of urgency.

Qualifications for trainers/staff

- We recommend that it should be a condition of the licensing of tracks and trainers that a certain standard of training for all staff including kennel hands should be introduced. All training should have a welfare component and, if appropriate to the post, should include assessment of practical skills in the care of greyhounds. The introduction of Centres of Excellence should be considered. These would provide hands-on training and the dissemination of information relating to good practice in greyhound care.



Transportation of greyhounds

- We recommend that all greyhounds should be able to stand up at full height and turn around whenever they are transported.

Track Safety and track design

- Members of the inquiry are concerned that the surface, design and dimension of tracks could have a significant impact on the welfare of dogs racing on that track, would be very interested in the results of the two industry commissioned research projects into track surface and design and would encourage future research projects looking into this important welfare issue. In the mean time it is imperative that tracks are maintained to the best possible standard.

Withdrawing dogs from races

- If, following consultations with the vet and track inspector, the trainer believes that the conditions of the track are unsafe for their dog(s), they should be entitled to withdraw those dog(s). However, any such incident must be reported to the regulatory body of the greyhound industry and should result in an inquiry. If this measure was to be introduced it would need to be clearly understood that trainers and owners could only withdraw their dogs in exceptional circumstances due to welfare and safety concerns.

Publication of injury data

- The inquiry recommends that the greyhound industry should be required by law to record and publish annual injuries to greyhounds on a central database.
- The regulatory body of the greyhound industry should publish an annual report to include three year rolling averages for injury incidence at named tracks. This report should also include information about how the track has attempted to reduce the injury rate. Prompt remedial action must always be taken if a greyhound track appears to have an unusually high number of injuries.

- We recommend that secondary legislation details what injury data should be collected, how it should be collected and who it should be collected by.
- We would support the development of new injury criteria which would ensure that the industry produces a better picture of the scale and frequency of all injuries occurring during greyhound racing, not just major injuries.

Veterinarians at race-courses

- We recommend that statutory regulations are introduced to make a veterinarian presence compulsory at all tracks
- We recommend that the Royal College of Veterinarian Surgeons (RCVS) consider introducing a greyhound specialism for the veterinary profession.

Identification of dogs

- We recommend that microchipping should be carefully considered as a possible alternative or additional method of identification of dogs.

Regulation of the industry

- It has clearly emerged from the inquiry process that there needs to be one broad system of regulation for all and one set of national standards that apply to all greyhound racing (although in some cases graduated rules depending on the income of the track/number of dogs involved may be appropriate).
- We recommend that the industry should be regulated by a broadened independent body. This body should include representatives from independent tracks, greyhound veterinarians and a significant number of representatives from animal welfare organisations as well as the current NGRC. No one group should have overall control of this broadened regulatory body and there should be equal weight of influence from all of the different interest groups involved. This will ensure that this body is not effectively identical to the current NGRC. The body should regulate according to a set of publicly agreed principles.



- A correctly constituted and broadened regulatory body would ensure that all of the greyhound industry is regulated including the independent tracks. The effect of this would mean that regulation by local authorities would not be required. We have seen no evidence and we do not believe that regulation by local authorities would be effective.

Financing of the industry and welfare payments

- Although spending on welfare has increased significantly over recent years, more money is still needed to ensure the welfare of dogs during and after their racing career. In addition, it is essential that if the public spotlight is lifted from the industry in the future, welfare payments continue to be maintained and increased.
- Whist we would like to see legislation introduced that would make welfare contributions from bookmakers compulsory, we have had evidence that this would be contrary to European Law. We suggest that Defra should seek an exemption in this case in order to find a method by which all bookmakers are required, in one form or another, to contribute to greyhound welfare.
- In the absence of a compulsory levy, we recommend that more money should be sought from bookmakers and that the rate of the voluntary welfare contribution should be increased in order to ensure good welfare of dogs.
- We recommend that everything possible should be done to encourage contributions from the 18 per cent of bookmakers who currently do not contribute to the voluntary levy.¹



SECTION A BACKGROUND

1. INTRODUCTION

1.1 The Associate Parliamentary Group for Animal Welfare

The Associate Parliamentary Group for Animal Welfare (APGAW) is a long-standing cross-party Parliamentary Group made up of almost a hundred MPs and Peers and over seventy associate animal welfare organisations. It aims to promote and further the cause of animal welfare by all means available to the Parliaments at Westminster and in Europe. APGAW is chaired by Eric Martlew MP for Carlisle and officers of the Group come from the three major political parties.

The core activity of APGAW is its regular meetings at which the Group hears from a wide range of speakers on many different animal welfare issues. APGAW has also traditionally set up working groups or enquiries to produce reports on subjects that the officers feel are important. Working Groups and enquiries allow APGAW the opportunity to investigate and report on the major animal welfare issues of the day.

The Associate Parliamentary Group for Animal Welfare is not a Select Committee.

1.2 'Seaham' and the Background of the APGAW inquiry

On Sunday the 16th July 2006, an article appeared in the *Sunday Times* alleging that "for the past 15 years David Smith, a builders' merchant, has been killing healthy greyhounds no longer considered by their trainers to be fast enough to race."ⁱⁱⁱ The article suggested that there could be up to 10,000 dogs buried at Smith's house in Seaham, County Durham. It included disturbing photographs; one of two greyhounds being held on a lead by Smith and another of Smith returning with the dogs' bodies in a wheelbarrow.

The events related by this article came to be known by the shorthand 'Seaham' or sometimes 'Seahamgate' and sparked a national outcry prompting much public interest in the question of what happens to ex-racing greyhounds when they retire. This had been a concern of animal welfare organisations for many years, who had consistently estimated that there are many thousands of greyhounds which are unaccounted for each year. Indeed, Seaham was not the first time reports had been uncovered about racing greyhounds suffering an unpleasant fate at the end of their racing careers. The animal welfare groups on the Greyhound Forum point out in a recent briefing that "two years ago a person in South Wales was convicted under the Protection of Animals Act 1911 for causing unnecessary suffering to a greyhound that had been shot by a humane killer and dumped, still alive, on a rubbish tip."ⁱⁱⁱⁱ

Indeed, unfortunately, there may well be other dog disposal operations in existence that are yet to be uncovered. Even the Chairman of the governing body of the sport, the British Greyhound Racing Board (BGRB) believes that "so far as other Seahams are concerned, I think it is very plausible that there are other cases out there. I cannot say confidently that there are not."^v

It should perhaps be noted that it is not illegal to kill healthy dogs as long as it is done in a humane manner and no cruelty is inflicted in the process (The Environmental Agency has since secured a successful prosecution against David Smith concerning breaches of environmental regulations regarding carcass disposal). However the regulatory body of the greyhound industry, the National Greyhound Racing Club (NGRC), strictly forbids the euthanasia of dogs by anyone other than a veterinarian surgeon.



The trainers identified with events uncovered in the article have now been suspended for life from NGRC racing and have been fined. The greyhound racing industry has taken several other measures in response to the Seaham revelations and these are detailed below in Section 1.5.

It is generally agreed, however, that the uncovering of events at Seaham constituted a major failing for the regulation of the industry whilst also being “a watershed for the sport.” As NGRC Chief executive Alistair McLean has said, “Seaham “appears to have galvanised all the stakeholders to accelerate their work in greyhound welfare.” Acknowledging that even before Seaham, the industry was increasing their attention to welfare concerns, champion trainer, Cheryl Miller has stated that:

“In the last year or so welfare has had such a high priority which is marvellous. We have this wonderful window of opportunity now to get things right” – Cheryl Miller

Many members of the Associate Parliamentary Group for Animal Welfare (APGAW) were disgusted by the revelations in the *Sunday Times* and felt that the time was ripe for a parliamentary inquiry into greyhound racing at this critical juncture. It is hoped that this window of opportunity can be used to ensure reforms that prevent large numbers of dogs being ruthlessly disposed of in the future and to improve the welfare of dogs involved in the racing industry at all stages of their lives.

1.3 Objectives and Terms of Reference of the inquiry

The inquiry was set up to investigate the welfare issues surrounding racing greyhounds in England, to identify factors which may improve standards at all stages of dogs' lives, and to advise on measures suitable for secondary legislation concerning the issue under the Animal Welfare Act. Areas of investigation include:

- Numbers of dogs involved
- Structure, regulation and financing of the industry
- Betting levies and other welfare payments
- Greyhound breeding
- Rehoming greyhounds
- Measures to extend the racing life of greyhounds
- Euthanasia of greyhounds
- The greyhound charter and the incoming code of practice
- Incidence of injury related to design of tracks
- Kennel standards
- Provision and Employment of Veterinarians at tracks and veterinary treatment in general
- Identification of dogs
- Transportation of dogs

1.4 Greyhound Racing in the UK

Greyhound racing has existed in Britain on a commercial basis for 80 years. Currently the industry falls into two sectors:- regulated and unregulated. There are 29 racecourses in Great Britain regulated by the National Greyhound Racing Club (NGRC). There are approximately 14 unregulated, independent racecourses in Great Britain.



The National Greyhound Racing Club (NGRC) is the industry's regulatory body. It is a non-profit making organisation and their responsibilities include:

- The implementation and management of the Rules of Racing and evolving and amending these rules in conjunction with the rest of the industry
- Licensing greyhound racecourses, trainers, owners, kennel staff and track officials and setting licensing fees in conjunction with key industry stakeholders to run the administration of the sport.
- Managing and maintaining the "Registry," which is a database of all greyhound owners, trainers and licensed staff and which records the change of ownership of all greyhounds,
- With its six Stipendiary Stewards, three Sampling Stewards and the Security Department, inspecting and maintaining standards.^{vii}

The British Greyhound Racing Board (BGRB) is the sport's governing body and its responsibilities include:

- Producing, implementing and managing the strategic plan, the annual budget and welfare, commercial and racing policy,
- Providing a media and PR service for the sport and a political interface with ministers and ministries
- Representing the sport with external stakeholders such as bookmakers, the Greyhound Forum and the Gambling Commission.

The BGRB is comprised of the BGRB Board (the highest authority in the industry), a Chairman, two independent Directors an Executive Office and the stakeholder associations representing racecourse promoters, greyhound owners, greyhound trainers and greyhound breeders.

More information about the structure of the regulated industry can be found in Appendix B.

We consider that well-regulated greyhound racing can be entirely consistent with good greyhound welfare

1.5 The Greyhound Industry's Response to Seaham

Punishing the offenders

According to the BGRB, the first stage of the industry's response to Seaham "involved a clear recognition that Seaham was unacceptable. NGRC acted swiftly and decisively to deal with offenders from licensed greyhound racing setting up an inquiry into events at Seaham."^{viii} The NGRC stated in their evidence to us that "As a consequence of Seaham, three NGRC licensed officials have been banned from NGRC racing and fined up to £2,000 each for breaches of NGRC rules; although destruction by captive bolt is not illegal, it is contrary to the Rules of Racing and other welfare concerns were also taken into account in dealing with this Inquiry."



Options for Change

The second phase of the industry's response to Seaham, according to the BGRB submission to this inquiry, is a process of "identifying, developing and agreeing the policies that accelerate the improvements of welfare under self-regulation already taking place. Following a welfare summit on 30th August 2006, it was agreed to set up a committee comprising BGRF, BGRB, NGRC, RGT, promoters and bookmakers to make fundamental decisions on policies. An overall committee will be chaired by Lord Lipsey with three sub-committees, headed respectively by the BGRB, the NGRC, and the promoters, working on specific areas. A paper entitled "Options for Change" has been produced as a starting point. This constitutes an industry-wide process to find new ways of improving greyhound welfare."* Some of the recommendations in this report are also being considered by the Options for Change Committees and we hope that they may decide to act upon these recommendations.

The Industry inquiry into Regulation

Finally, the industry has set up its own inquiry into regulation of the industry. This is being Chaired by Lord Donoughue and is likely to report in mid 2007.

1.6 The Need for an APGAW inquiry

It was strongly felt that an *independent* parliamentary inquiry was also required in addition to measures undertaken by the greyhound industry itself, as well as the measures undertaken by Defra.

1.7 The Information Gathering Process

Eric Martlew MP announced the APGAW inquiry at the July 2006 meeting of APGAW. Following that meeting, a general call for written evidence was circulated inviting interested parties to submit written evidence to the inquiry and this was accompanied by a press release and a statement on the APGAW website. All Associate Members were also sent correspondence inviting them to submit written evidence. Several organisations and individuals contacted the Secretariat, many suggesting further contacts to whom the Group should write. The inquiry pursued these suggested courses of investigation in order to gather as much information on the issue as possible. Several organisations and individuals were also invited to give oral evidence and answer the questions of inquiry members. A list of all those who supplied written and oral evidence or information is included in the appendix.

1.8 Limitations of the Information Gathering Process

APGAW could not take responsibility for exhaustively contacting every organization and individual that may have an interest in greyhound racing. Instead the onus was on interested parties to respond to the general call for evidence and to contact APGAW and it was hoped that word of mouth, in conjunction with various promotional methods, would ensure that as many people as possible contacted the inquiry with information relating to greyhound racing in England.

Given the importance attached to this issue, inevitably some of the written and oral evidence was slanted to support a particular take on greyhound racing and on the way it should be regulated in the future. The Group has tried to avoid bias in this report and, where possible, to rely on actual evidence rather than conjecture.



2. THE ANIMAL WELFARE ACT AND SECONDARY LEGISLATION

2.1 The Animal Welfare Act and the Duty of Care

The Animal Welfare Act came into force on 28th March 2007 in Wales and on 6th April 2007 in England. This means that from these dates all those who are responsible for greyhounds will owe a duty of care to take reasonable steps to provide for their welfare needs. **We welcome the introduction of the Animal Welfare Act and believe that it creates unprecedented opportunities to protect the welfare of animals in the UK, including greyhounds.**

2.2 Statutory Regulations and Code of Practice

Under the Animal Welfare Act 2006, Defra have plans to introduce both Regulations and a Code of Practice relating to the welfare of greyhounds. Due to devolution there may be different regulations and Code of Practice passed by governments in England and Wales. In England, Defra have committed to bring the Regulations and Code of Practice forward in draft by the end of 2008, to come into force by April 2009 at the latest. Regulations are made by a Statutory Instrument and are binding; the Code of Practice will be approved by Parliament but will not be legally binding although it will be possible to use it as evidence in a court of law. Defra are facilitating a Greyhound Working Group to provide guidance on these regulations. It is also hoped that this report can provide some guidance on some of the issues to be considered during the process of drafting secondary legislation under the Animal Welfare Act.

2.3 The Greyhound Forum and the Greyhound Charter

The Greyhound Forum is chaired by the Dogs Trust and made up of both industry members and welfare representatives. According to a September 2006 briefing on the then Animal Welfare Bill, "the Greyhound Forum was formed in 1994 following recognition that greyhounds were forming a large proportion of the stray/abandoned/unwanted dogs in the UK [and] something had to be done...."

The Greyhound Forum have produced a very detailed Charter and Code of practice to which the industry adheres in the main, and aspires to in some areas."^{xi}

The Greyhound Charter is likely to form the basis for Defra's incoming Code of Practice although many welfare groups hope that the new Code of Practice will extend welfare measures beyond the level of the current Charter.

SECTION B FINDINGS



1. NUMBER OF GREYHOUNDS

There are varying estimations about the exact number of greyhounds currently associated with the greyhound racing industry (i.e numbers of dogs bred, racing and retiring). Indeed, the inquiry has served to confirm how few reliable statistics exist about greyhounds and greyhound racing. There are large holes in existing records of:

- The numbers of greyhounds bred
- The numbers failing to ever make the track
- What happens to unwanted greyhounds
- The numbers of dogs being kept as pets or being rehomed.
- The numbers of dogs being destroyed
- Incidence of injury.

The number of dogs involved in the industry is very difficult to establish given these gaps in existing records. Indeed, one of our witnesses suggested that “to overestimate the number by even one dog is to risk being slated by the industry for exaggerating the problem; to underestimate the number by even a single dogs runs the risk of being accused of a cover-up by welfare activists.”

We have collected all of the information currently available to come up with the figures below. Until a reliable and accurate way of tracking greyhounds is developed, the figures below must be regarded as purely conjectural and can provide only an indication of the true picture. It must be a matter of extreme priority for the industry to improve the tracking of dogs.

1.1 Number of Dogs Bred

Most dogs that race in England are bred in Ireland and estimates for this range from 75 to 80 per cent.

It is possible to get a fairly reliable figure for the amount of dogs bred for the NGRC sector by consulting the Stud Book. According to the Greyhound Stud Book, 608 litters were registered in 2006 in Britain and according to the Irish Greyhound Board, 4,481 litters were registered in Ireland. Greyhound litters consist of, on average, approximately six–seven pups suggesting that approximately 31,367 dogs were bred in Ireland whilst 4,256 dogs were bred in Britain in 2006.^{xii}

Additionally, we can get a good idea of the numbers of dogs bred into the industry in Britain that do not make it to the NGRC track by comparing the NGRC’s figures for the number of dogs earmarked (this takes place when the pup is between 10 and 16 weeks) and the numbers of dogs that are later registered for racing (this takes place approximately between 15 and 20 months of age)

According to the NGRC^{xiii}:

2002	5,903 were earmarked and 2,632 were registered to race
2003	6,103 were earmarked and 2,795 were registered to race
2004	4,365 were earmarked and 3,375 were registered to race
2005	4,480 were earmarked and 2,766 were registered to race



This suggests that of 5,903 British-bred pups earmarked in 2002, 2,795 youngsters went on to race on NGRC tracks in 2003. Therefore:

- A minimum of 3,108 British dogs bred in 2002 never made it to NGRC tracks
- A minimum of 2,728 British dogs bred in 2003 never made it to NGRC tracks
- A minimum of 1,599 British dogs bred in 2004 never made it to NGRC tracks

Some of these young dogs may go on to race on independent tracks. However, we have no firm figures for this and estimate that it is not likely to be a very large number. This suggests that, depending on the particular year, between 1,500 and 3,000 British bred dogs do not make it to the NGRC track. This averages out at a figure of 2,478 dogs between 2002 and 2004 who are never registered for NGRC racing (although trends suggest that this figure is gradually going down). If British bred pups represent 25 per cent of all the pups bred to supply the British industry (with the remaining 75 per cent bred in Ireland), and if the same sort of circumstances exist in Ireland, this would suggest that a further 4,500 to 9,000 Irish bred dogs do not make it to the track. This represents a total of 6,000 to 12,000 puppies that are bred to supply the British racing industry (although some of these dogs may also have been produced for the Irish market) that never make it to the racing track and go missing somewhere between the age of 16 weeks and 15 months. The majority of these dogs will be kept in their country of birth until they start training at which point their timidity, their lack of speed or their lack of interest in racing will lead them to be discarded as 'non-chasers.' Some of these non-chasers will be re-homed (young dogs may be easier to rehome than retiring dogs). However, there are no accurate figures in order to establish what happens to these dogs. More information about what happens to 'surplus' dogs can be found below but **in the absence of evidence to the contrary, we must assume that a significant number of these young greyhounds are destroyed. The issue of what happens to young greyhounds who do not make it to the track remains a serious area of concern for the inquiry.**

1.2 Number of Dogs Racing

According to the NGRC the numbers of greyhounds registered to race at NGRC tracks are^{xiv}:

2002	10,722
2003	10,709
2004	11,912
2005	11,412
2006	10,101

This represents an average of 10,971 dogs newly registered for NGRC racing in any given year. These figures do not include the numbers of dogs that will have been registered in the preceding years but are still racing (greyhounds are only registered once for NGRC racing). These figures also do not include the numbers of dogs also racing on independent tracks and many independent tracks do not track the numbers of dogs racing on their tracks.



However, the independent track we spoke to had a registration form for all greyhounds and had a racing strength of approximately 150 in any given year. A survey of independent tracks was done in March of 2006 and the author estimated that there was approximately 4,000 dogs racing, at that time, on the 17 independent tracks around the country although this may have been an over-estimation. Currently there are approximately 14 independent tracks suggesting that there would now be substantially less than 4,000 dogs racing on independent tracks.

In addition, the independent track we spoke to said that up to 20 per cent of their dogs may be racing on both independent and licensed tracks (racing on the licensed track under their studbook name and on the independent track under their pet name). This means that an estimated maximum of 800 out of the estimated maximum of 4,000 dogs racing on independent tracks may also be included in the figures above. However, again these figures are unsubstantiated and are likely to be an over-estimation.

Taken the above into account this means that the total average numbers of dogs racing on both NGRC and Independent tracks can be estimated at approximately 14,000.

1.3 Number of Dogs Retiring

According to the NGRC approximately 11,000 registered greyhounds leave NGRC racing every year. The NGRC's actual figures for the last five years can be found in the table below:

2002	10,301
2003	10,532
2004	10,955
2005	11,401
2006	10,945

As the NGRC point out "this is a consistent figure which mirrors the amount of greyhounds which are registered with the NGRC in the proceeding years. If the number of registrations were to fall this year, the number of greyhound leaving NGRC racing in the next few years would decrease."^{xv} There will also be an additional number of dogs retiring from the independent sector each year. However, we do not have accurate figures for this.

1.4 Number of Unwanted Dogs

This suggests that there are 11,000 dogs that retire from NGRC racing each year plus, in England, an average of 2,478 young dogs who do not make it to the track. (However, it should be remembered that there is a very significant further number of young dogs in Ireland bred ostensibly for British racing that also do not make it to the track). In addition, these figures only relate to regulated racing and no figures are included for the 'surplus' dogs created by approximately 14 independent tracks.

This means that the regulated greyhound racing industry produces, at a minimum, a 'surplus' of 13,478 greyhounds in England and Wales each year.



1.5 What Happens to Unwanted Dogs?

There are a number of things which may happen to unwanted dogs. The NGRC have recently developed a new retirement form which came into effect in November 2006. This retirement form has the potential to represent a substantial improvement in the tracking of dogs, giving detailed information about what happens to dogs that are no longer required for racing. Although this newly developed form has not yet been in use long enough to provide reliable figures, the table below is useful in giving an idea of what can happen to unwanted dogs. Further details about some of these fates can be found below.

Retained (registered owner or trainer)
As pet
Breeding
Unknown
To be homed
Racing Independents
Racing Ireland
Racing world
Schooling
Racing Europe
Racing unknown
Charity
Non-RGT
RGT
Given or sold to a new owner
As pet
Breeding
Unknown
Racing Independents
Racing unknown
Racing NGRC (transfer not completed)
Racing Ireland
Coursing
Schooling
Racing Europe
Racing world
Euthanasia
Humane grounds
Unsuitable as a pet
Natural causes
Injury not treated on economic grounds
Unknown
Terminal illness
No home could be found



1.5.1 Number of Dogs Rehomed

According to the animal welfare groups on the Greyhound Forum, “the Retired Greyhound Trust which is funded largely by the industry, rehomes about 3,500 dogs a year. Other welfare charities probably rehome a further 1,500 dogs a year.”^{xvi} The RGT rehomed 3,443 greyhounds in 2005 and 3,900 dogs in 2006 but we do not have accurate figures for the numbers of greyhounds rehomed by other rehoming charities.

We recommend that all rehoming charities should consider reporting the identification numbers of those dogs they rehome so that a better idea could be obtained for the number of dogs the independent welfare organisations are rehoming.

1.5.2 Number of Dogs Kept as Pets/Kept in Kennels

The Federation of British Greyhound Owner’s Association have suggested that “many owners of ex-racers are content to pay a monthly kennel bill to keep their greyhounds in familiar and secure accommodation for the rest of their lives or until found a home.”^{xvii} Indeed, we know of at least one trainer who has six retired dogs at their kennels and has not informed the NGRC that they are retired. However, it was generally agreed that trainers have a living to make and they cannot support and keep all of their ex-racing dogs for the entirety of their natural life whilst at the same time kennelling new dogs. Greyhounds retire at three or four years old but will live to approximately 14 years of age. A greyhound could therefore have 10 years additional life expectancy post-retirement

The animal welfare groups on the Greyhound Forum state that “Naturally some owners and trainers retain some of their dogs as pets after their careers are over but that number is unknown because of the lack of data from the NGRC registration system and independent racetracks. We consider that it is unlikely to be in excess of 3,000 although that again is speculative.”^{xviii}

1.5.3 Number of Dogs Sent to Ireland/Other Countries

The NGRC claims that 759 greyhounds returned to Ireland in 2005 and 752 returned to Ireland in 2006. (245 for breeding, 226 for racing, 111 as pets, 110 retired to Ireland, 45 sold back to Ireland, 22 miscellaneous.) They also say that they have noted that it is not a requirement of an NGRC licensed trainer to advise the NGRC of all greyhounds returned to Ireland. Following consultation with the Greyhound Trainers Association and other relevant stakeholders in the sport, the NGRC intends to introduce this as a requirement in the trainer’s application process in the near future.^{xix}

According to the Dogs Trust “We have unproven but nevertheless strong anecdotal evidence to suggest that some greyhounds are returned to Ireland following their retirement, in order to be euthanased and giving owners/trainers the ability to relieve themselves of their responsibility as well as the “killings” being carried out, out of the glare of media investigations. As the small group of professional greyhound transporters generally only bring dogs from Ireland to the UK, the vehicles would [sometimes] move empty in the opposite direction. It would therefore make economic sense to return dogs at a minimal cost.”^{xx}



Indeed, we have heard evidence that if a person wanted to secretly dispose of an unwanted greyhound whilst still appearing to remain within NGRC rules, all they would have to do is record on the NGRC form that the dog has returned to Ireland. The NGRC are not always able to check whether the information on the form is correct. It is therefore unclear as to how many of the 759 dogs returned to Ireland in 2005 would, in actual fact, have been destroyed.

In addition some greyhounds may be exported abroad, mainly to Spain. Although the only official track has now closed in Spain, the Dogs Trust has stated “we are aware that greyhound racing continues in Spain on a peripatetic basis and that this disposal route, although reduced in scale, is likely to continue.”^{xxi}

We recommend that Defra should investigate the number of dogs that are being transported in both directions between Ireland and England as well as the conditions under which those dogs are being transported.

1.5.4 Number of Dogs Euthanased

We do not have an exact number for dogs euthanased either by a vet or by methods that contravene NGRC rules.

During interviews with the owners and trainers of Welsh greyhounds, APGAW Wales found that between 100 and 300 greyhounds were being shot in South Wales every year. However, the working party conducting the research agreed that it was difficult to arrive at an exact figure for the number of greyhounds being shot by their owners.

The figures in the sections above suggest that approximately 5,000 dogs are rehomed, 3,000 dogs may be retained as a pet, and 750 dogs may return to Ireland each year. This comes to a total of 8,750 dogs out of at least 13,478 unwanted dogs each year. **Under these figures a minimum of 4,728 dogs are unaccounted for each year and we can assume that the majority of these dogs are destroyed. However, this figure does not account for dogs from independent racing or those which are bred for the British racing industry in Ireland. These figures must therefore be regarded as conjectural and are likely to be a significant underestimation of the true scale of the problem of unwanted dogs being destroyed.**

The inquiry recommends that euthanasia should only be considered as a last resort where it is in the best welfare interests of the animal because of serious injury or where the dog is unsuitable as a pet. Many of the recommendations in this report are directed at reducing the number of healthy dogs that are euthanased when they become ‘surplus’ to the needs to the racing industry.

The inquiry recommends that secondary legislation should make it illegal for a registered greyhound to be put down by anyone other than a vet except in exceptional circumstances where there is an unacceptable level of suffering and a vet is not available.



Under current NGRC Rules, Rule 18 requires that a dog be euthanased only if the following options are unavailable:

- retained as a pet
- boarded at a licensed kennel
- found a home through the Retired Greyhound Trust
- sold or found a home responsibly

However, as one of these options is always available, we would suggest that Rule 18 should be amended to remove any ambiguity and to state a clear policy towards euthanasia.

1.6 Tracking of Dogs

It has clearly emerged from the inquiry process that even the NGRC's current improved system of tracking dogs is substantially less rigorous than what needs to be in place. By its own admission, the industry does not have sufficient information to be able to produce accurate figures regarding what happens to 'surplus' dogs. This is a very bad reflection on the industry and indeed, some witnesses have pointed out that the greyhound industry would not be allowed to keep their financial records as they have traditionally kept their records of racing and retired dogs.

However the situation is improving. In 2005 the NGRC created its Retired Greyhound Department. This involved the recruitment of a Retired Greyhound Coordinator. The NGRC have, since 2005, had one person working full time on issues relating to the retirement of dogs. However, as of February 2007, a new part time member of staff has been appointed to assist in this work. In addition the Retired Greyhound Coordinator works alongside the NGRC's Registry Department (made up of 4 people), to ensure that owners are not allowed to register further greyhounds if they have previous un-registered greyhound retirements. This is an improvement on the old situation when Rule 18 was rarely enforced.

However, the system remains inadequate. **The greyhound industry must improve its tracking of dogs as a matter of urgency.** The team which is responsible for tracking dogs and producing figures for retired dogs needs to be substantially strengthened. Sanctions for not registering the fate of a retired greyhound must be strictly and consistently imposed and must carry substantial penalty. In addition, any new system of tracking greyhounds should make all possible attempts to remain compatible with already existing data.



2. MEASURES TO REDUCE NUMBER OF UNWANTED DOGS

2.1 Increasing Rehoming

It is generally agreed that most greyhounds will make very good pets. They need little grooming and only a moderate amount of exercise (the RGT suggest that two 20-minute walks per day is sufficient).

There may, however, be a small number of greyhounds that are unsuitable for rehoming due to their temperament. The RGT estimates that this may be four to five per cent of all greyhounds and that this adds up to approximately 140 of the dogs they see each year. In addition there is a limited amount of households who are willing and/or suitable to rehome a greyhound.

Rehoming charities have great success with the number of dogs they rehome. The Dogs Trust will rehome approximately 14,000 dogs and the RSPCA will rehome about 18,000 dogs in any given year. However, these figures illustrate that there are thousands of dogs of other breeds which need to be re-homed every year and it would not be helpful to increase the re-homing of greyhounds at the expense of other breeds.

The average cost of rehoming a dog is £700 according to the Dogs Trust. The cost may be more for a greyhound who may need special attention either because of the injury which has led to the dog's retirement or because of the extra rehabilitation needed for an animal who has never lived in a home environment before.

The RGT has dramatically increased the numbers of dogs it rehomes in recent years and this has coincided with increased funding being provided by the industry. There is no reason to doubt that if rehoming groups were provided with more funds, they may be successful in rehoming more dogs each year. However, based on estimates of the numbers of dogs presently involved in the industry, it is highly unlikely that a situation will ever be reached in which all dogs currently involved in the industry can be re-homed. The number of dogs required by the industry should therefore be substantially decreased so that it is possible to rehome all 'surplus' dogs.

We recommend that all greyhound tracks, as a condition of their licence, include an associated rehoming scheme and that, at a minimum, this scheme aims to rehome a large percentage of the dogs principally racing on that track. In the long term, it would be ideal if the associated rehoming scheme were able to rehome all dogs retiring from running principally on its associated track at a high standard and without compromising dog welfare.

We recommend that funding to the RGT and to independent re-homing centres is increased.

2.2 Decreasing Numbers Bred and Increasing Quality and Welfare in breeding

We have seen that approximately 1,500 to 3,000 British young dogs do not make it to NGRC tracks and may be killed each year. In addition to this approximately 75 per cent of dogs racing in England originate in Ireland. There will be a much higher number of puppies who never make it to the track in Ireland. Therefore **measures need to be taken as a matter of urgency to reduce the demand for greyhound pups.**



It is very difficult to restrict the number of greyhounds bred and the numbers of dogs coming over from Ireland. Restricting the numbers of dogs that are bred is likely to contravene EU trade regulations. However, it may be possible for Defra and their counterparts in Ireland to investigate the instigation of joint initiatives aimed at tackling this problem, for example by introducing spot-checks at Holyhead to ensure transporters comply with EU transport regulations. Indeed this is an issue that can only be addressed in its entirety in collaboration with Irish authorities. **We recommend that Defra engage with the Irish authorities over possible joint initiatives to tackle a number of issues arising from this report including over-breeding and transportation of greyhounds**

In addition, it would be possible to introduce a licensing system for breeding and **we recommend that all breeders and their premises should be registered if not licensed by the industry's regulatory body and should be regularly inspected (commercial dog breeders should already be licensed and inspected under the Breeding and Sale of Dogs (Welfare) Act 1999)**

It is possible that the cost of a licensing system could be self-financing in the form of a registration fee. This would mean that the cost would be born by the breeders themselves. However, it is important that the British breeding sector, already suffering, is not put under further burdensome restriction and this would need to be carefully considered.

Currently the greyhound industry claims that the welfare issues surrounding breeding fall outside of their remit. The inquiry believes that the greyhound industry should accept that the breeding of large numbers of dogs to supply their industry should be of major concern to that industry and that they should take steps to register and inspect breeders, and to keep records of the numbers of dogs being bred from licensed breeders.

Attention also needs to be paid to standards of breeding and to the traits for which dogs are currently bred. It is important to note that the genetic make-up of a greyhound can have an affect on the racing life of that greyhound. Some breeding lines, for example, have more propensity to certain (e.g. hock) injuries than others. Some are bred for speed rather than longevity and endurance. The conditions in which a greyhound is bred, and the knowledge and actions of the breeder, can also impact on the welfare of the dog later in life. For example the nutrition that a greyhound receives in its early years affects the condition of that dog's bones and the likelihood that the dog will experience injury later in life. Measures therefore need to be taken to ensure good standards in greyhound breeding.

2.3 Re-organizing the Racing Calendar

Many of our witnesses commented that they believe there are currently too many races taking place and that these races require too many dogs. They point out that high racing demand can increase injury rates, can mean that ground staff do not have sufficient time between race meetings to prepare the racing surface to optimum safety standards, that trainers have insufficient time to diagnose and treat injuries and greyhounds may not have sufficient rest periods between races.



We recommend that the racing calendar is re-organised in order to require fewer dogs. This could result in each individual dog racing less often and having an increased likelihood of enjoying a longer racing career. This could be offset by measures to increase the numbers of veteran and handicapped races and financial incentives should be introduced to ensure the popularity of such races. We would also welcome some industry research into the effect of reducing the frequency of racing on the length of a dog's racing career. Indeed, if a re-organised racing calendar were combined with such measures to extend the racing life of greyhounds, this could significantly impact the numbers of dogs retiring and potentially being destroyed each year.

2.3.1 Bookmakers Afternoon Greyhound Service (BAGS)

BAGS was set up in 1967 in order to provide greyhound racing in the afternoon during the (then) opening hours of betting shops. BAGS racing involves few on-course spectators and the dogs run solely for the off-course bookmakers.

Greyhounds' Voice give figures for a typical racing week suggesting that "in the week beginning 20 August 2006 there were a total of 1,444 races requiring 8,664 greyhounds. Of this figure 487 of the races were BAGS or BEGS requiring 2,922 greyhounds meaning that over a third of racing in that week was for BAGS/BEGS"^{xxii}

According to evidence from the Association of British Bookmakers, "BAGS now purchases rights to 1,650 greyhound meetings and 21,000 races per annum. BAGS is responsible for 26 per cent of meetings run under NGRC rules. In the current year, BAGS will pay a total of some £15 million to the 16 tracks that participate in the BAGS service."^{xxiii}

The suggestion that BAGS racing should be reduced would have a significant negative effect on the income of the industry. As one witness suggested, "the simple answer to the problem is that often racing is both a lot of the problem and a lot of the solution. It does cause a lot of extra pressure on the industry but it is undeniably where the money comes from..." We would suggest that efforts should be made to ensure that the level of BAGS racing does not serve to negatively impact the welfare of dogs involved.

2.3.2 Contractual Arrangements Between Trainers and Tracks

We have heard that trainers are often under substantial pressure from promoters to keep their racing strengths up. Those with contracts at major tracks have to guarantee that they will supply a certain number of dogs to the track at all times. One witness told us that "trainers are often threatened with dismissal if their racing strength drops. This compromises the welfare of the greyhounds as injuries may not be detected or some trainers may feel obliged to run dogs with minor knocks for fear of losing their job. Minor knocks can lead to serious injury if raced."

We recommend that individual greyhounds should not be permitted to race any more than three times in any given seven day period. Although it is currently highly unusual for any dog to race more often than three times a week on NGRC tracks, this should be built into regulations.



2.4 Extending the Racing Life of Greyhounds

The Society of Greyhound Veterinarians state that “As greyhound racing is staged largely as a gambling medium, what is important is that races should be made competitive by pitting dogs of comparable ability against one another; it is not necessary for any of the dogs involved to possess great pace against the clock. Probably, the single factor that most significantly influences the duration of the racing career of a greyhound is the frequency and severity of any injuries received during training and racing.”^{xxiv} Some of the measures below could contribute to the extending the racing life of greyhounds involved in the British industry.

2.4.1 Handicapped Races

We recommend that the industry should increase numbers of handicapped races. This means that instead of starting on the level, greyhounds start one behind the other and as a dog gets older and slower it can be given a better handicap meaning that it can continue racing for longer. It also means that as a result of the staggered start there may be fewer injuries sustained on the first bend.

2.4.2 Veteran Racing

We recommend that the industry should continue introducing more senior greyhound races with a minimum age for a dog to participate. Veteran races and a veterans’ derby already take place but these initiatives need to be extended to enable more dogs to retire at a later age. This would also introduce new events for the industry and income generated by veteran and handicapped races could offset any loss of revenue caused by the re-organisation of the racing calendar suggested above.

It would be necessary to ensure that this did not impact negatively on the welfare of older dogs. However, as one ex-Trainer told us, “some dogs love to race. Dogs will not race unless they enjoy it, they will just stop, and you cannot force a greyhound to race. Greyhounds run because they do enjoy it. That does not give us the right to put them on surfaces that are not safe for them to run on. But if surfaces were safe for them to race on then they could increase their racing life, some of them would run quite happily until six or seven.”

2.5 Increasing the Registration Fee

Currently it costs £25 to register a greyhound for racing with the NGRC. There has been considerable debate within the industry and amongst welfare groups about the possibility of increasing the registration fee and about what may constitute an appropriate increase. Welfare groups have suggested that a fee in the region of £300-£500 would ensure that dogs are no longer viewed purely as a cheap commodity that can be easily discarded. There has been concern expressed by the industry that a significantly increased fee (even a fee in the region of £100) would mean that small-scale owners would no longer be able to afford dogs and dog ownership would become restricted to professional trainers. There has also been some concerns expressed that the additional expense at registration would mean that trainers may no longer be able to pay for other essential welfare measures.



While it is important the fee does not increase to such an extent to be completely prohibitive, one witness has pointed out that currently the licence to register a dog costs substantially less than the licence for an inanimate television. In addition, the cost of the registration fee has remained relatively constant over a number of years and has not risen even at the rate of inflation. It is hoped that by increasing the registration fee, greyhounds will be viewed as more valuable and this may increase responsible ownership and improve the calibre of owners and trainers. If an owner or trainer cannot afford to pay any more than £25 to register their greyhound, it is already unlikely that they can afford to pay the much greater costs associated with keeping a dog to high animal welfare standards. **We recommend that the registration fee is significantly increased (at least doubled) immediately and that a proportion of this increase is used to boost the funds allocated to the Retired Greyhound Trust and other rehoming charities. However, it would need to be clearly understood that payment of an increased registration fee would not allow owners or trainers to relinquish any responsibility for their dog when it retired. It would also need to be clearly understood that this money would provide an *addition* to existing welfare monies and not a replacement for those monies.**

The level of the registration fee should be regularly reviewed. In the long term we suggest that the industry investigate the possible effects of introducing a much larger registration fee which could be kept as a dowry and returned to the owner on evidence being received that their dog had met an acceptable fate at the end of its racing career.

2.6 Decreasing Injuries

Injuries often cause the termination of a dog's career. The Society of Greyhound Veterinarians state that "even those with a nodding acquaintance with the greyhound racing industry will probably have an intuitive idea that the incidence of injury in racing greyhounds might depend on the interactions of many complex factors, principally factors relating to the design and maintenance of the track and factors relating to the age, nutrition, experience and fitness of the competing greyhounds."^{xxv} There are many measures which could be taken to try to reduce the incidence of injury and some of the information in section 3 relates to this.



3. THE RACING LIFE OF A GREYHOUND

3.1 Kennelling and Kennel Standards

Currently the NGRC outline specifications for kennel standards under Rules 212 and 213 and the Society for Greyhound Veterinarians have said that they are happy to endorse those standards. The RSPCA adds that “all kennels and other built accommodation must be constructed and maintained to the standards provided by the ‘Model Licence Conditions and Guidance for Dog Boarding Establishments which have been drawn up by the Chartered Institute of Environment Health.”^{xxvi}

Owners and trainers that currently race on the independent tracks often do not keep their dogs in kennels, instead keeping them as pets at home. We recognise that being kept in a home environment can be an advantage to the welfare of the dog. If one system of regulation should come into effect for all tracks (both independent and NGRC tracks), we believe that keeping a small number of dogs in the home environment should not be prohibited (it is not currently allowed under NGRC rules). We therefore recommend that where an owner has a small number of dogs they should be permitted to keep these dogs in the home environment. However, in order for these dogs to be registered for racing, the owner must allow entry into their premises so that standards can be inspected.

3.2 Inspections

Currently tracks and trainers’ kennels are inspected by NGRC Stipendiary Stewards. Tracks are also inspected by their own vet prior to each days racing with the vet having the final say as to whether racing should be allowed to go ahead on that day.

According to the Society for Greyhound Veterinarians, “Riding establishments and Boarding Establishments are subject to inspection and licensing by inspectors appointed by the Local Authority. In the case of Riding Establishments, this is invariably by a veterinary surgeon experienced in equine matters. In the case of Boarding Establishments, a less qualified inspector is often nominated. In the case of greyhound kennel inspections the trainer appoints and pays any veterinary surgeon of his or her choice for the annual inspection. This can lead to conflict of interests. Further the selected veterinary surgeon may have little knowledge of greyhounds or the relevant greyhound regulations.”^{xxvii}

We believe that inspectors should be independent of influence from tracks or trainers.. There may be a possibility that the industry could investigate alternative methods of employment of veterinarians whereby the vet was employed directly by the regulatory body rather than by the track. It would be preferable if tracks and trainers were not inspected by their own veterinary surgeon.

We recommend that tracks and trainers’ kennels must continue to be regularly inspected to ensure high welfare standards. This inspection must be monitored and should be undertaken by inspectors who are independent and have no commercial interest in the premise under inspection. The body that undertakes and oversees these inspections should be accredited by a national accreditation body such as the United Kingdom Accreditation Service (UKAS)).



As part of the extended co-operation between industry and welfare groups, we envisage reputable welfare groups having access to tracks and being encouraged to attend race days.

We recommend that the current regulatory body should increase its number of Stipendiary Stewards as a matter of urgency.

3.3 Qualifications for Trainers, Kennel and Track Staff

The inquiry heard evidence that it may be possible for people to be employed in the industry who have little knowledge about caring for greyhounds. It has been regularly asserted that it is too easy to get a trainer's licence with one witness asserting that "Nowadays if you can afford a trainer's licence fee you can become a greyhound trainer with no experience whatsoever." We asked the NGRC to detail how many applications for a trainer's licence were rejected. They quote that in 2006 of the 167 trainers applications, 35 applicants failed to get past the first stage of a formal application and a further 13 were rejected at a later stage.^{xxviii}

The BGRB hired a training consultant in October 2005 to do a training needs analysis. In response to this two NVQs have been developed for track maintenance and kennel hands. These NVQs were piloted in 2006 and due to their success will be rolled out during 2007 on a voluntary basis. The introduction of these NVQs was a significant step forward for the industry. However, there is more that needs to be done.

There have, for example, been doubts raised as to the extent that the NVQ can test the practical skills involved in looking after dogs. One witness told us that "skills should be displayed and ultimately proven by way of recognised qualification with the emphasis on practical ability, rather than written or academic skills. There should also be an agreed 'time served' stipulation (e.g. kennel hand working with a licensed trainer before he or she can become one in his/her own right) before the licence is granted so that enough practical experience is gained."

There have also been suggestions that a small number of centres of excellence are set up around the country where kennel hands and other staff or potential staff could obtain hands-on training under knowledgeable and experienced people. These centres of excellence could also be a hub for research relating to greyhound welfare and for the dissemination of information relating to good practice.

We recommend that it should be a condition of the licensing of tracks and trainers that a certain standard of training for all staff including kennel hands should be introduced. All training should have a welfare component and, if appropriate to the post, should include assessment of practical skills in the care of greyhounds. The introduction of Centres of Excellence should be considered by the industry. These would provide hands-on training and the dissemination of information relating to good practice in greyhound care.

3.4 Transportation of Greyhounds

Greyhound racing involves a large number of journeys for individual dogs sometimes over large distances. Professional transporters have vehicles fitted with cages for substantial numbers of dogs, sometimes up to 30, which are often stacked two-high.



Cages can be very small and restrict the movement of dogs. According to the Dogs Trust, “the conditions in which dogs are transported over these long distances has been a concern for many years. We are aware that one transporter has been prosecuted in Spain and another was convicted in the UK in September 2006. The apparently poor conditions often encountered during transport from Ireland to the UK and vice versa, plus the transport into Europe could be rectified by more scrupulous inspection of animal transportation and adherence to current national legislation,”^{xxix} for example the Welfare of Animals (Transport) (England) and (Wales) Orders 2006 implement EU Regulation 1/2005.

However, **we also recommend that all greyhounds should be able to stand up at full height and turn around whenever they are transported.** Welfare groups have suggested that International Air Transport Association (IATA) regulations should be in place when dogs are transported. These regulations cover cage sizes and relate to materials and principles of design, ventilation, and so on. If IATA regulations were introduced, they may need to be phased in over a number of years.

In addition the Animal Welfare Act imposes a duty of care on anyone who is responsible for a greyhound (including professional transporters) to take reasonable steps to provide for that dog’s welfare needs.

3.5 Track Safety

3.5.1 Surface, Design and Dimension of Tracks

The Society for Greyhound Veterinarians state that “in the absence of hard evidence, experienced greyhound vets suspect intuitively that the incidence of injury in race dogs probably depends on such factors as the dimensions of the track, the nature of the running surface, the weather and the dogs themselves.”^{xxx}

In terms of surface, sand has now almost completely replaced grass as a running surface on greyhound tracks. Greyhounds’ Voice is a committee of expert people involved in the industry at grassroots levels as trainers, owners, promoters, journalists, vets and charity representatives. They tell us that “the racing surface itself is of paramount importance when considering the greyhound welfare issue. Poor surfaces or badly maintained surfaces will cause career ending injury to greyhounds thus prematurely placing each greyhound within the re-homing structure. Many of the tracks were designed many years ago when greyhounds were generally smaller and slower.”^{xxxi}

Greyhounds’ Voice has particular problems with sand as a surface, suggesting that injuries can occur both when sand is very compacted and also when sand is too loose. They suggest Starmat as an alternative track surface and suggest that although Starmat freezes at extremely low temperatures (between -6 and -10), any difficulties caused by freezing can be resolved by an undersoil heating/cooling system which has been tested with Starmat and proven to work very well. Greyhounds’ Voice therefore believe that a practical experiment should be undertaken into Starmat as an alternative surface. Leading veterinary surgeons in the greyhound industry support such an experiment



The industry is implementing a research programme into track surface led by the Sports Turf Research Institute at Bingley in West Yorkshire. Phase one of this three phase research project has been completed and the industry have implemented the recommendations from this phase. The BGRB have also funded a three year project by the University of Liverpool in order, among other things, to gather further information about how the design of the greyhound track may affect racing on that track. This may include some information about the relationship between design of track and incidence of injury as well as information about the effects of various weather conditions on injury rates. **Members of the inquiry are concerned that the surface, design and dimension of tracks could have a significant impact on the welfare of dogs racing on that track, would be very interested in the results of the two industry commissioned research projects into track surface and design and would encourage future research projects looking into this important welfare issue. In the meantime it is imperative that tracks are maintained to the best possible standard.**

3.5.2 Withdrawing Dogs from Races

Due to the existence of off-course betting, NGRC tracks do not allow owners or trainers to withdraw their dogs if they feel that the track is unsafe to race on. The track veterinarian inspects the track before racing begins and once they declare that the track is safe there is no opportunity for trainers to withdraw their dogs. Welfare groups point out, however, that the vet can be put in a compromising position and circumstances could arise where a vet does not want to displease and anger their employer by declaring the track unsafe and losing the promoter a large amount of money. **If, following consultations with the vet and track inspector, the trainer believes that the conditions of the track are unsafe for their dog(s), they should be entitled to withdraw those dog(s). However, any such incident must be reported to the regulatory body of the greyhound industry and should result in an inquiry.**

There have been some concerns expressed, however, that if withdrawal of dogs is allowed, this could lead to people withdrawing for reasons other than welfare (whilst still claiming a safety problem) and that this would affect the integrity of the sport. **If this measure was to be introduced therefore it would need to be clearly understood that trainers and owners could *only* withdraw their dogs in exceptional circumstances due to welfare and safety concerns.**

3.6 Publication of Injury Data

The industry has had an extremely poor record at recording, collating and reporting injury data. Although this is beginning to improve, the publication of injury data needs substantial further improvement as a matter of urgency.

The NGRC tell us that “there are a number of different injury databases being kept by a number of different stakeholders and many of these databases make use of different criteria.”^{xxxiii} Currently, however, the main organisation collecting injury data is the Racecourse Promoters Association (RCPA). This organisation has a financial interest in ensuring that public confidence in the track is maintained.



According to the BGRB “in late November last year the RCPA provided their most recent report from six months of data from the middle of 2006 (comprising 123,000 trials and races). This yielded a percentage incidence of injury of 0.45 per cent of which the relative figure for hock and wrist injuries was 0.23 per cent.”^{xxxiii} It should be noted, however, that this figure is for *serious* injuries that result in a dog being unable to race for more than six weeks. There is some debate about what scale of injury should be reported and recorded by the industry with many believing that minor injuries should also be recorded. Most injuries that occur in racing are unrecorded minor injuries and continued racing with minor injuries can often cause major injuries to occur. **The inquiry would support the development of new injury criteria which would ensure that the industry provides a better picture of the scale and frequency of *all* injuries occurring during greyhound racing, not just major injuries.**

If the categories are changed, however, it is very important that some kind of continuity with the old system is retained. The inquiry has heard that data collection within the industry has never been in a steady state and has been evolving over a number of years. This effectively means that the data that does exist is not comparable. We therefore suggest that injury statistics could be collected on a graduated scale. Figures should continue to be collected for serious injuries that preclude a greyhound from racing for six weeks or more. However, statistics should also be produced for less serious injuries (whilst ensuring that such injuries are not counted twice).

The Society of Greyhound Veterinarians have stated that they would like to see a central database of injury statistics which would record dog identity, sex, age, pedigree and weight as well as information about the precise nature of the dogs' injuries, at what stage in the race its injuries occurred, the environmental conditions of the track at the time of injury, and so on. The industry has had discussions with the Horseracing Regulatory Authority regarding the database used in horseracing and this is to be welcomed.

Many people feel, however, that injury statistics should be accessible and that currently what statistics there are (which relate only to the NGRC sector) cannot be validated and are not usually available, even on an anonymised basis, to anyone but a very few individuals within the RCPA, BGRB and NGRC.

In a letter to Eric Martlew MP on 17th January 2007 the Chairman of the BGRB, Lord Lipsey stated that:

“The Society of Greyhound Veterinarians (SGV) play an important role, liaising with track vets to help ensure that the input of data is fully standardised across all racecourses. A standard reporting form, developed with the SGV, is used by all vets at all participating racecourses and, once completed, these are sent to the RCPA General Secretary. The data is subsequently entered on a database and aggregated. Periodically the aggregated data is returned to all tracks in an anonymous form together with the summary details for each of the particular tracks so that they can check and verify their own data as to accuracy. The RCPA also provides reports to Greyhound Forum meetings. For reasons I explained



during the evidence session, we cannot and will not contemplate publishing data for named individual tracks. To do so would be to risk extremist attacks on tracks and those that work on them.”^{xxxiv}

The inquiry had doubts about the validity of the argument that injury data cannot be publicly related to particular tracks because of the risk of extremist attacks. Animal extremists would be against greyhound racing per se and would be unlikely to target a particular track based on their injury data. This is especially true if prompt and public action is taken to rectify any problems which may be leading to a high level of injury.

We recommend that the greyhound industry should be required by law under statutory regulations to record and publish annual injuries to greyhounds on a central database. The regulatory body of the greyhound industry should publish an annual report to include three year rolling averages for injury incidence at named tracks. This report should also include information about how the track has attempted to reduce the injury rate. Prompt remedial action must always be taken if a greyhound track appears to have an unusually high number of injuries. We recommend that secondary legislation details what injury data should be collected, how it should be collected and who it should be collected by.

3.7 Vets at Racecourses

The Society for Greyhound Veterinarians explain that “the role of the veterinary surgeon at a greyhound racing meeting is twofold: (1) to provide first aid and, if necessary, euthanasia, to dogs injured during the course of the meeting and (2) to enhance the integrity of the sport as a betting medium by pre-race inspection of greyhounds and, where requested by the Stewards of the National Greyhound Racing Club, the collection of samples for drug-testing.”^{xxxv}

The NGRC rules make it compulsory to have veterinary attendance on site during both racing and trials and there are around 100 veterinarians involved in NGRC track work (besides those who treat greyhounds as part of their private practice). There is no such provision for independent tracks although some ten out of the approximate 14 existing tracks do claim to provide veterinarians.

The Committee recommends that statutory regulations are introduced to make veterinarian presence compulsory at all tracks.

3.7.1 Provision and Facilities

The RSPCA believes that at each track “a treatment room must be provided which must be capable of being heated, lit and kept clean to a high standard. It must be secure and away from public access.”^{xxxvi} Greyhounds’ Voice add that treatment rooms should include observation cages.



3.7.2 Independence

The Society of Greyhound Veterinarians suggest that “those track vets who are licensed by the NGRC are independently appointed in a process overseen by the British Greyhound Racing Board. The SGV favours this approach, recognising that independent appointment permits track vets to work without fear or favour and ensures their impartiality, enhancing the welfare of the competing dogs and the integrity of the sport as a gambling medium”^{xxxvii} There is a possibility that a track could withdraw from using the services of a particular vet who raises a welfare concern. The Society of Greyhound Veterinarians therefore suggest that complaints against certain vets should always be referred to the Royal College of Veterinary Surgeons (RCVS) rather than the regulatory body having any direct governance over track vets. Recommendations of the inquiry relating to the independence of vets and other people who inspect premises can be found in section 3.2.

3.7.3 Training

Currently the RCVS does not recognise greyhound practice as a specialty although they have stated that there is no reason why this could not change in the future “if someone active in the field was able to satisfy the criteria for recognition.” Vets who attend horse race courses have postgraduate training as well as mandatory mid-career training. Although, the NGRC provides some training for vets that it licenses, the Society for Greyhound Veterinarians point out that until the RCVS officially recognises greyhound practice as a legitimate specialisation and offers some sort of postgraduate qualification in this sphere, it will not be possible for the NGRC or any other regulatory body to insist that track vets have some sort of specialist training.^{xxxviii}

The inquiry recommends that the RCVS consider introducing a greyhound specialism for the veterinary profession.

3.8 Identification of Greyhounds

Dogs have traditionally been identified by ear tattooing. Irish bred dogs are identified by having a tattoo in both ears whilst those bred in the UK have only one ear marking. However, the current system of tattooing is open to some error and there have been widely-publicised cases of mutilated dogs being found with their ears cut off so that they can not be identified with a particular owner or trainer. Many witnesses have suggested that microchipping, a practice which is now widespread and relatively cheap, may be a better way of identifying dogs. The inquiry did, however, hear some evidence about incidences of microchips being dug out of dogs leaving the dog with a large and open wound. The industry is currently considering the introduction of microchipping and this is to be welcomed. **We recommend that microchipping should be carefully considered as a possible alternative or additional method of identification of dogs.**



4. REGULATION OF THE INDUSTRY

4.1 Current Regulation and the Role of the NGRC

As stated in section 1.4, the industry is currently regulated by the National Greyhound Racing Club (NGRC). In addition the British Greyhound Racing Board (BGRB) is the sport's governing body. More information about the NGRC and BGRB can be found in Appendix B.

4.2 Defra's Current Plans for Regulation: Statutory Regulations, the Greyhound Charter and the Incoming Code of Practice

Under the Animal Welfare Act 2006, Defra have plans to introduce both Regulations and a Code of Practice relating to the welfare of greyhounds. Regulations are made by a Statutory Instrument and are binding; the Code of Practice will be approved by Parliament but will not be legally binding although it will be possible to use it as evidence in a court of law. The Code is also likely to be connected to the rules of the regulatory body of the industry so that a breach of the Code could result in, for example, the suspension of a licence (breaching the Regulations on the other hand, will be a breach of the law). Defra have committed to having these measures in place by the end of 2008 and we feel that the Animal Welfare Act and its secondary legislation will substantially improve the welfare of greyhounds. We understand the Welsh Assembly Government will also be introducing regulations and a Code of Practice.

Defra have stated that the current Greyhound Charter will be the starting point for the content of the incoming Code of Practice. However we would suggest that the Code of Practice should be substantially more robust and more detailed than the current Greyhound Charter.

Welfare groups have been campaigning for many years for Defra to introduce statutory regulation of the greyhound racing industry. They claim that the industry cannot be trusted to regulate itself and does not have sufficient commercial independence to be able to ensure welfare standards are maintained. This will be discussed further below.

Defra have repeatedly stated that they are not in favour of introducing statutory regulation. However, they have accepted that the industry needs to "clean up its act" and put its "house in order." Defra Minister Ben Bradshaw has stated that the industry is drinking in the "last chance saloon" and that if they do not make significant changes, then Government will step in to regulate using measures under the Animal Welfare Act. Defra have asked the NGRC at a minimum to change its name, employ more Stipendiary Stewards, and to put UK accreditation in place. They also expect the industry and welfare groups to work together in setting up a national register of racing greyhounds that would provide a record of individual dogs right up to their retirement.

4.3 Independent Tracks

There is also a sector of the greyhound racing industry that remains unregulated and unlicensed either by the NGRC or by Government. There are currently approximately 14 independent tracks in the UK. According to independent track Bolton and Westhoughton Greyhounds, the ratio of licensed tracks to independents is approximately 2:1 and one million people attend independent tracks every year.



Standards at independent tracks vary widely and we think it is likely that early investment may need to be made to bring all independent tracks up to the standard required by the Animal Welfare Act.

Representatives from the NGRC regulated sector point out that the existence of an independent sector makes it difficult to enforce NGRC rules. If trainers are found to be contravening NGRC rules and their licence revoked, they always have the option of continuing to race on independent tracks. The existence of an independent sector also makes it harder to track dogs as some dogs who retire from NGRC tracks may go on to race on independent tracks and indeed some dogs may be racing on both NGRC tracks and independent tracks under different names (although this is against NGRC rules)

However, many independents feel that they are being used as a scapegoat by the regulated industry. Indeed, whenever Seaham is mentioned to licensed persons, reference is often made to the independent sector despite the fact that NGRC dogs were featured in the *Sunday Times*. Clearly there has been a great deal of conflict or bad blood between the two sectors in the past.

There is a tendency in the NGRC sector as well as amongst some welfare representatives and Government officials to assume that independents have lower welfare standards and this may be the case at some tracks. However, the inquiry heard about the differences between the two sectors and there are pros and cons to each:

Benefits of NGRC

- Drug Testing (Integrity)
- Vet always in attendance
- Dogs have to race under stud name
- Tracks and trainer premises inspected and must be to certain standard

Benefits of Independents

- Provides a training facility for saplings which will go on to race under NGRC
- Provides an outlet for NGRC dogs which retire at a young age
- Handicapped races result in less injuries
- Owners tend to have fewer dogs so greater emotional attachment (more like pets)
- Owners can withdraw dogs from races if they are unhappy with standard of track

Indeed, we have been told that the independent tracks have at least one advantage over licensed tracks and that is that it is possible for there to be a much closer relationship between the owner of a greyhound and the greyhound itself. Dogs are often kept as family pets (although not always). A dog that is living in a well-kept home environment may be better cared for than a dog living in a kennel environment, even a well-kept kennel. The Dogs Trust agree stating that "In the independent sector the majority of dogs live with their owner/trainer in comparatively small numbers. Because of the closer relationship it seems likely that their welfare may be better protected."^{xxix}



Defra is in the process of setting up a sub-group to the main greyhound working group to look specifically at the issue of independent racing. The independent track we spoke to had substantial concerns about being regulated by the NGRC. They would be more happy to be regulated by a local authority but expressed concerns about the cost of this solution and about whether local authorities would have the necessary expertise. It seems very unlikely that, given the historical relationship between the NGRC and independent tracks, it will be possible for the NGRC as it is currently constituted to regulate the independent sector harmoniously.

It is generally agreed that many independent tracks are in decline and are rapidly closing down. Some have suggested that the cost of measures that would be required under NGRC rules (such as having vets on site) may lead to the closure of further independent tracks. There has been some suggestion that changes under secondary legislation of the Animal Welfare Act may lead to the independent sector as a whole becoming unviable.

As the Dogs Trust suggests, “any regulation should find a balance between being over prescriptive and being so lax as to be ineffective.”⁴ There are some welfare measures which should be obligatory whether this leads to a track becoming commercially unviable or not. However, there are some measures (such as the requirement for dogs to be kennelled) which may be able to be implemented in a graduated manner.

4.4 A Potential Model for Future Regulation

It has clearly emerged from the inquiry process that there needs to be one broad system of regulation for all and one set of national standards that apply to all greyhound racing (although in some cases graduated rules depending on the income of the track/number of dogs involved would be appropriate).

We recommend that the industry should be regulated by a broadened independent body. This body should include representatives from independent tracks, greyhound veterinarians and a significant number of representatives from animal welfare organisations as well as the current NGRC. No one group should have overall control of this broadened regulatory body and there should be equal weight of influence from all of the different interest groups involved. This will ensure that this body is not effectively identical to the current NGRC. The body should regulate according to a set of publicly agreed principles.

A correctly constituted and broadened regulatory body would ensure that all of the greyhound industry is regulated including the independent tracks. The effect of this would mean that regulation by local authorities will not be required. We have seen no evidence and we do not believe that regulation by local authorities would be effective.

We believe it is possible to create an accepted regulatory body which would have the confidence of *all* the tracks *and* welfare groups, as well as others involved in the industry such as owners and trainers. This would give the independent tracks fair representation, whilst the substantial involvement of welfare representatives would ensure that welfare is protected. The body would be able to draw on the expertise of the NGRC and welfare organisations as well as grass roots expertise from both



industry and welfare sides to ensure that lessons are learnt from previous experience. It would be expected that the broadened regulatory body would build on the reforms that are currently in process in the industry.

The details, structure and role of this broadened organisation would need to be carefully considered and there have been many suggestions relating to aspects of this structure. One suggestion is that the broadened regulatory body would contract with an independent welfare advisory board which would hold an agreed list of experts who could act as inspectors for the industry. This would ensure that inspectors are never directly employed by the premises which they inspect.

According to a group of grassroots industry representatives, the Greyhounds Voice: “we would recommend the formation of a new greyhound welfare body, distinct from both the NGRC and the BGRB, whose role it to agree and administer reform, to monitor and stringently police all aspects of greyhound welfare from the birth of the greyhound to their becoming pets. All tracks, owners and trainers must adhere to their welfare rules and regulations. This body would be transparent both in terms of policy and funding with annual financial accounts clearly displayed in the racing press.... [It] would include representation from parties such as the NGRC, BGRB, Greyhounds' Voice, the Dogs Trust, RSPCA and other recognised greyhound charities, each with a voice but with no party having overall control. This body would have overall control of all areas of greyhound welfare to ensure that the greyhounds' welfare is paramount. It would assume various roles including the employment of vets... and to monitor and police many of the proposals contained in this report.”^{xii}

As Greyhounds' Voice point out, a broadened regulatory body of the greyhound industry should be regulated, monitored and audited with a high level of accountability and transparency. It is hoped that potentially a newly broadened regulatory body could reinvigorate the industry and boost public confidence so improving attendance and revenue at greyhound races.

The cost of setting up the structures required for a broadened independent regulator is unclear although there is no doubt there would be a small additional cost involved. Perhaps the initial outlay could be covered by contributions from all those involved in the broadened regulatory body as well as a contribution being made from the bookmakers. It may be that the Government could also make some funds available. The inquiry would also suggest that Defra should take a lead in deciding upon the structure of the broadened regulatory body in order to ensure that it has equal representation from all stake-holders and that the regulator is not effectively identical to the NGRC as it is presently constructed.



4.5 The Case for a Broadened Regulator

The inquiry accepts that the NGRC, in their own words, “is a small organisation punching way above its weight in terms of what it does for the greyhound industry.” The NGRC do a good job of ensuring the integrity of the sport and in recent years, and especially since the appointment of Alistair MacLean as Chief Executive, the NGRC have made many improvements in the way they run and in the way they regulate welfare within the industry. Many of the individuals employed by the NGRC are competently carrying out important work and have accomplished much in the last few years under difficult circumstances. The broadened regulator would therefore need to include the current NGRC.

However, the work of some good individuals with good will cannot be enough to overcome the historical, institutional and structural problems of the NGRC and the inquiry believes it is time for a broadened regulator that will not be burdened by a flawed legacy and that can maintain high levels of confidence and bring a renewed vigour to the industry as a whole.

The case for a broadened independent regulator is laid out in the five points below:

1. There is a lack of trust between the NGRC and both the independent sector and welfare groups

Even if the NGRC as it is presently constructed wins the trust and confidence of Government, it is highly unlikely it will ever win the trust of either welfare groups or the independent tracks. The ability of all of these groups to work together is vital to the improvement of welfare within the industry. Although currently some of these groups appear to be working together through measures such as the Greyhound Forum, on a more practical and day to day level, serious problems exist. For example, one independent track suggested that though they were more than happy to be independently inspected, they did not want to be inspected by the NGRC as they would be concerned that they were not impartial. If independent tracks and animal welfare bodies had equal representation in the governance of a broadened regulatory body, this would ensure that all stakeholders would have confidence in the regulatory body.

2. The NGRC has consistently failed to provide reliable data about the numbers of dogs involved in the industry, about what happens to dogs at the end of their racing career and about incidence and frequency of injury.

If the current NGRC and independent sectors were regulated by the same commonly respected authoritative body, then it would be much easier to enforce rules and to keep track of all dogs involved in the industry.

3. In many respects the NGRC continue to suffer from a lack of adequate systems and structure

Although this is beginning to change, many required improvements continue to be instigated by bodies outside of the NGRC. For example Defra have stated that, at a minimum, the NGRC must increase the number of Stipendiary Stewards that they employ. We have heard that the NGRC currently employs six Stipendiary Stewards and three Sampling Stewards. According to their own figures, the NGRC regulates 927 trainers (training anything above four dogs) plus 493 professional trainers (who may have large numbers of dogs at their kennels, perhaps up to 70 or 80). Some of these



trainers are visited twice a year. If all of these trainers were visited just once this would involve 1420 visits per year (if they were visited twice it would involve 2840 visits). It should be self-evident that the NGRC need more than six Stipendiary Stewards to carry out this function effectively. A similar situation exists with the Retired Greyhound Co-ordinator who it seems even with the best will in the world (and even with part time help) cannot collect, analyse and report the data relating to 11,000 retired dogs each year. According to the Dogs Trust “The NGRC has been in existence for decades and suffers from a lack of openness, accountability and audibility, largely as a result of a lack of, or poorly managed systems”^{xiii} The existence of these inadequate systems only seems to come to light when public attention is focussed on the NGRC and the NGRC has been historically extremely resistant to change.

4. Seaham, along with the continued existence of large numbers of unaccounted for dogs, show that historically the NGRC have been unable to effectively enforce their rules

Seaham suggests that an unidentified number of greyhound trainers disobeyed NGRC rules obviously expecting that there would be little consequence to their actions. This is not surprising as the NGRC, until recently, appears to have done little to police or enforce Rule 18 (the NGRC rule which states the owner's responsibility for the welfare of their greyhound, their responsibility for making suitable arrangements for that greyhound when it retires and their responsibility to inform the NGRC of the retirement of any greyhound). Indeed if it were not for the *Sunday Times* article, the evidence suggests that the actions of the trainers would not have been discovered. Although it is not confirmed, the numbers of dogs that go unaccounted for each year suggests that Seaham is not an isolated incidence. This suggests that there is an institutional problem within greyhound racing of people disregarding NGRC rules regarding the retirement of greyhounds with little respect for the authority of the organisation. A broadened regulatory body would be in a much better position to garner the respect of all those involved in the greyhound racing industry and, from the start, to establish that rules must be abided by, that if rules are contravened, this will be brought to light and heavy sanctions will always be applied in consequence.

5. Financial considerations can override welfare needs within the current structure.

The NGRC has consistently been open to the charge that it is more accountable to commercial interests than to welfare considerations. A newly broadened regulatory body could be structured from the outset in such a way as to minimise the possibility of this charge being applied in the future.



5. FINANCING OF THE INDUSTRY AND WELFARE PAYMENTS

In the long term, the welfare of dogs depends largely on the wealth of the industry

5.1 The British Greyhound Racing Fund

The British Greyhound Racing Fund is the official funding body for NGRC licensed greyhound racing in Britain. The BGRF collects and distributes money within the regulated greyhound racing industry. Each year the BGRB and the BGRF go through a budgeting process in which they invite bids from various industry committees, including a welfare committee. The independent Directors of the BGRB then consider what is appropriate and produce a budget which is later approved by the BGRB Board and then the BGRF Board as a whole.

5.2 Industry Expenditure on Welfare and Industry Payments to Welfare Organisations

Out of a total of £11,775,000 spent by the BGRF in 2006, £2,760,000 was spent on welfare. Of this “£2,760,000 £1,300,000 was spent on retired greyhounds, £970,000 was spent on the category of ‘welfare attendance – racecourses’, £150,000 on training and education and £340,000 was spent on Welfare and track safety R&D”^{xliii}

Although, spending on welfare has increased significantly over recent years (by 62 per cent in the last three years), rehoming organisations continue to need more money from the industry. One welfare group have said that they receive £3 per day per dog from the industry and that this is “a drop in the ocean compared to what our costs are.” When asked whether additional money would solve the problem of rehoming greyhounds, the Director of the Retired Greyhound Trust, Ivor Stocker, stated that “we have never had sufficient monies to test [this].” When asked to recommend one thing which could improve greyhound welfare he added “the biggest single thing which would help would be to have more funds available to educate the general public, the dog-owning public, about what great pets greyhounds make.” The BGRB agrees saying “the more money the RGT has the greater the scope to extend its effective advertising campaign for new owners.”^{xliv}

In addition there has been some concern expressed amongst welfare groups that some of the spending under the welfare budget would be more appropriately classed under other budget lines.

Although spending on welfare has increased significantly over recent years, more money is still needed to ensure the welfare of dogs during and after their racing career. In addition, it is essential that if the public spotlight is lifted from the industry in the future, welfare payments continue to be maintained and increased.

5.3 The Financial Position of the Industry

Although it is essential that the welfare budget is maintained and increased in the coming years, it must also be acknowledged that 2005 was financially the worst year for the greyhound racing industry for many years. Although greyhound racing is Britain's third largest spectator sport, the BGRF in their annual report state that “the difficult trading conditions experienced in 2004 have continued during 2005 with on average a small decline in both attendances and tote turnover.”^{xlv} This has the potential to place a significant strain on the greyhound industry.



5.4 The Betting Industry and Bookmakers' Voluntary Contributions

27 per cent of the betting which bookmakers take is on greyhound racing and this equates to about £1.74 billion a year. The Greyhound racing industry receives approximately £11.5 million from the bookmakers through a voluntary contribution of 0.6 per cent of turnover. This voluntary welfare levy has gone up from 0.4 to 0.6 in the last three years and according to the British Greyhound Racing Fund in 2005, "the percentage of contributors on a shops basis rose to about 82 per cent"^{xlvi}

However, we have seen that more money is required in order to improve the welfare of dogs both during and after their racing career. Chief Executive of the Association of British Bookmakers has stated that "If it should emerge from these enquiries that more money is needed for welfare I believe, and my colleagues on the bookmakers' side of the fund believe, that more money could be made available from within the Fund's existing resources."^{xlvi} However, the inquiry also believes that it is important that the bookmakers themselves increase their contribution to the welfare of greyhound racing.

Whist we would like to see legislation introduced that would make welfare contributions from bookmakers compulsory, we have had evidence that this would be contrary to EU regulations. We suggest that Defra should seek an exemption in this case in order to find a method by which all bookmakers are required, in one form or another, to contribute to greyhound welfare.

In the absence of a compulsory levy, we recommend that more money should be sought from bookmakers and that the rate of the voluntary welfare contribution should be increased in order to ensure good welfare of dogs both during and after their racing career. We also believe that everything possible should be done to encourage contributions from the 18 per cent of bookmakers (approx 1,407 betting shops) who currently do not contribute to the voluntary levy.^{xlvi}



APPENDIX A

Organisations and individuals submitting written or oral evidence and further information

APGAW Wales
Association of British Bookmakers Ltd
Tom Kelly
Blue Cross
Bolton and Westhoughton Greyhounds
Rod Eccles
Louise Eccles
British Greyhound Racing Board
Lord David Lipsey
John Petrie
British Greyhound Racing Fund
Charles Lenox-Conyngham
British Veterinarian Association Animal Welfare Foundation
Bronwen Gradwell
Cheryl Miller (ex-NGRC Greyhound trainer and local RGT)
Dogs Trust
Chris Lawrence
Dumfrishire Greyhound Rescue
FAITH Animal Rescue
Leigh Assinder
Federation of British Greyhound Owners' Association
Gary Beggs (Greyhound trainer) Rosewood Kennels
Gary Honeywood
Greyhound Action
Greyhound Breeders Association
Bob Gilling
Greyhound Compassion
Greyhound Forum
Greyhound Rescue Wales
Alain Thomas
Greyhounds in Need
Anne Finch
Greyhounds UK
Maureen Purvis
Greyhounds' Voice
Barrie Clegg
Linda Jones (Greyhound trainer and Greyhounds Voice)
Helene Nowell
Henry Bull
Horseracing Regulatory Authority
Irish Greyhound Board
John J. Sherry
Kennel Club



League Against Cruel Sports

Mike Hobday

Minister for Sport, DCMS, Richard Caborn MP

Minister of State (Local Environment, Marine and Animal Welfare), Defra, Ben Bradshaw MP

Mrs A. Hare

Mrs J. McCombe (NGRC trainer)

Mrs Lindsay Fairhurst

Mrs Sue North

National Greyhound Racing Club

Alistair McLean

Luke Taylor

Hazel Bentall

Pro Animal Greyhound Sanctuary, Limerick, Ireland

Marion Fitzgibbon

Racecourse Promoters Association

Clarke Osborne

Simon Levingston

Retired Greyhound Trust

Ivor Stocker

Romford Greyhound Owners Association

Royal College of Veterinary Surgeons

RSPCA

David McDowell

Claire Robinson

Sheila Iremonger

Sighthound Welfare Trust

Society of Greyhound Veterinarians

Michael Watts

Susan Breininger, Honolulu USA

The Sunday Times

Daniel Foggo

Veterinary Greyhound Welfare Group

Lord Christopher CBE

Simon Adams MRCVS



APPENDIX B

Current Structure of the Regulated Industry (from the BGRB Submission to the APGAW inquiry)^{xlix}:

The sport is divided into two groupings namely:

- Licensed greyhound racing
- Independent greyhound racing (sometimes referred to as 'flapping')

Licensed Greyhound Racing

The licensed greyhound industry has 29 racecourses licensed by the National Greyhound Racing Club (NGRC) to conduct racing under the Rules of Racing. These 29 racecourses are collectively referred to as the licensed racecourses.

The licensed industry has three key bodies responsible for the governance, financing and regulation of the industry. These bodies are:

a. British Greyhound Racing Board (BGRB). This is the sports governing body that has responsibility for all aspects of the industry and representation of stakeholders.

b. British Greyhound Racing Fund (BGRF). This is the body responsible for collecting voluntary contributions from bookmakers and providing management and oversight of the BGRB budget.

c. National Greyhound Racing Club (NGRC). The NGRC is the body responsible for regulating the industry in accordance with the Rules of Racing. The Senior Steward of the NGRC is appointed as a director of the BGRB. In essence, the role of the NGRC is:

- To act as the judicial body for the discipline and conduct of the licensed industry and to administer a code of conduct through the rules of racing.
- To frame and amend the Rules of Racing after consultation with the BGRB.
- To license greyhound racecourses, trainers, owners, kennels and officials and after consultation with the BGRB determine and collect fees relating to such licenses.
- To keep a register of owners and all greyhounds racing at greyhound racecourses licensed by the NGRC.

d. Racecourse Promoters Association (RCPA). This is a trade association representing the 29 x licensed racecourses. Some racecourses are individually owned, others by groups including bookmakers. The association works closely with the BGRB and elects five directors to the BGRB. It also provides representation and support to all of the BGRB's standing committees (Executive, Welfare, Racing and Commercial)

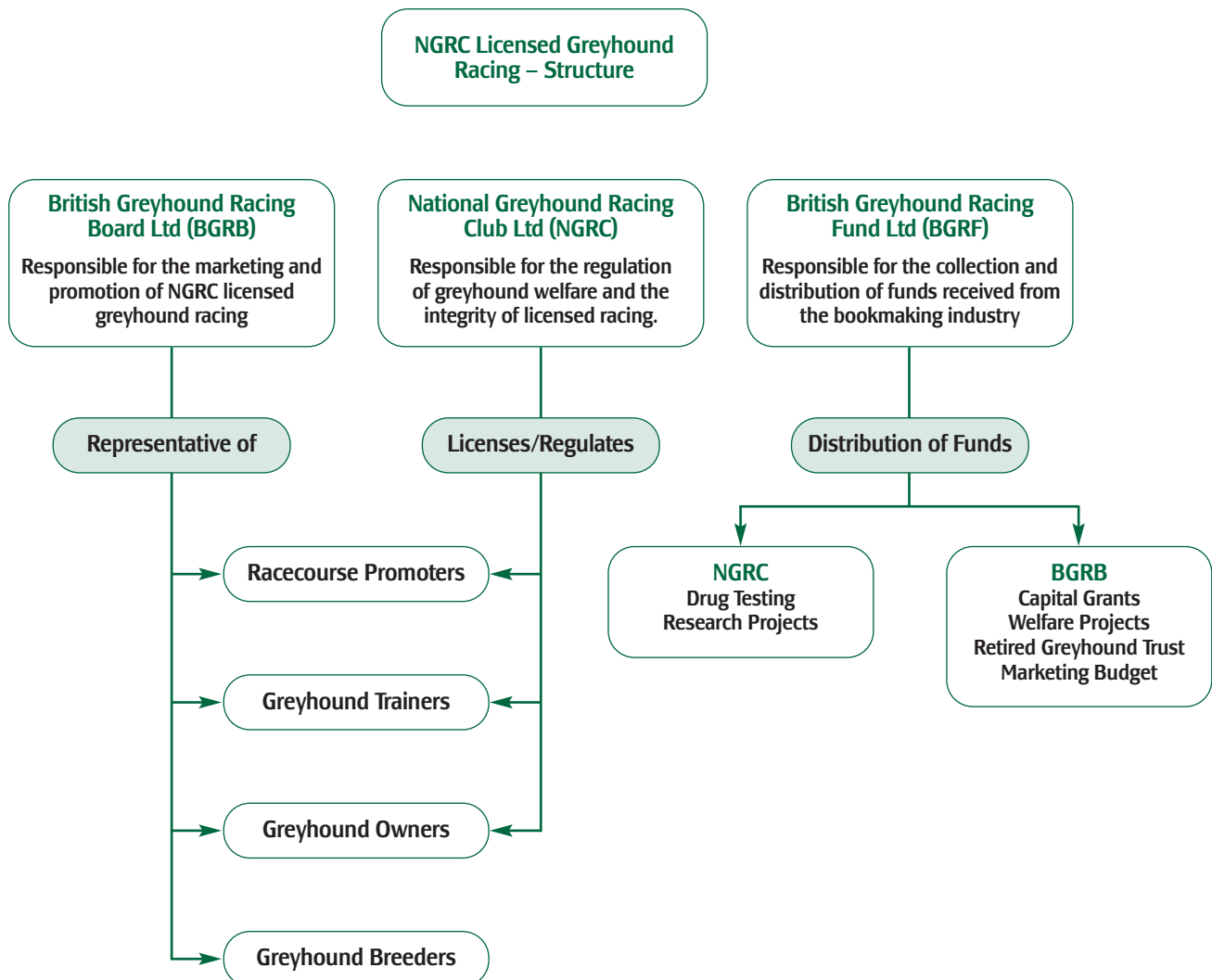
e. Federation of British Greyhound Owners Association (FBGOA). This association represents those greyhound owners that are affiliated to racecourse owners associations. The FBGOA has two directors on the BGRB Board elected to that office by members of the FBGOA.

f. Greyhound Breeders Forum (GBF). This association represents British breeders of racing greyhounds. It promotes responsible breeding and organises competitions solely for British bred greyhounds. The GBF has one director on the BGRB Board, elected to that office by members of the GBF.

g. Greyhound Trainers Association (GTA). This association represents the Professional Greyhound Trainers that have been licensed as such by the NGRC. Its role includes allocation of funds from the Trainers Assistance Fund. It does not represent the non-professional trainers that are termed "greyhound trainers." The GTA has one director on the BGRB Board elected to that office by members of the GTA.



Summary of structure (from the NGRC submission to the APGAW inquiry)¹





- ⁱ Figures from 2005 (cited in BGRF Annual Review 2005)
- ⁱⁱ Foggo, D., "Revealed: the man who killed 10,000 dogs" *The Sunday Times*. Sunday 16th July 2006
- ⁱⁱⁱ The Animal Welfare Groups on the Greyhound Forum. "Animal Welfare Bill Greyhound Welfare Brief" September 2006
- ^{iv} Lord David Lipsey, Chairman of the British Greyhound Racing Board. Statement given during oral evidence to this inquiry. 11th January 2007
- ^v Alistair McLean, Chief Executive of the National Greyhound Racing Club. Statement given during oral evidence to this inquiry. 11th January 2007.
- ^{vi} Cheryl Miller. Statement given during oral evidence to this inquiry. 7th December 2006
- ^{vii} National Greyhound Racing Club Ltd "Submission to the APGAW inquiry into Welfare of Racing Greyhounds in England" p. 4
- ^{viii} British Greyhound Racing Board "Evidence for the APGAW inquiry into the Welfare of Racing Greyhounds in England" p. 5
- ^{ix} National Greyhound Racing Club Ltd "Submission to the APGAW inquiry into Welfare of Racing Greyhounds in England" p. 2
- ^x British Greyhound Racing Board "Evidence for the APGAW inquiry into the Welfare of Racing Greyhounds in England" p. 5
- ^{xi} The Animal Welfare Groups on the Greyhound Forum. "Animal Welfare Bill Greyhound Welfare Brief" September 2006
- ^{xii} Society of Greyhound Veterinarians. Written submission to APGAW inquiry into welfare issues surrounding racing greyhounds in England
- ^{xiii} National Greyhound Racing Club Ltd "Submission to the APGAW inquiry into Welfare of Racing Greyhounds in England" p. 7
- ^{xiv} Ibid, p. 8
- ^{xv} Alistair McLean, Chief Executive of the National Greyhound Racing Club. Letter to Eric Martlew. April 2007
- ^{xvi} The Animal Welfare Groups on the Greyhound Forum. "Animal Welfare Bill Greyhound Welfare Brief" September 2006
- ^{xvii} Federation of British Greyhound Owners' Association. Written submission to the APGAW inquiry into the welfare issues surrounding racing greyhounds. October 2006
- ^{xviii} The Animal Welfare Groups on the Greyhound Forum. "Animal Welfare Bill Greyhound Welfare Brief" September 2006
- ^{xix} Alistair McLean, Chief Executive of the National Greyhound Racing Club. Letter to Eric Martlew. 5th February 2007
- ^{xx} Dogs Trust. Written submission to the APGAW inquiry into the welfare issues surrounding racing greyhounds
- ^{xxi} Ibid
- ^{xxii} The Greyhounds' Voice "Report to APGAW for their inquiry into welfare of racing greyhounds in England" 9th October 2006 Section 4.1.1.
- ^{xxiii} Association of British Bookmakers Ltd. Submission to APGAW inquiry into the welfare issues surrounding racing greyhounds in England
- ^{xxiv} Society of Greyhound Veterinarians. Written submission to APGAW inquiry into welfare issues surrounding racing greyhounds in England
- ^{xxv} Ibid
- ^{xxvi} RSPCA "Response to APGAW inquiry into the welfare of racing greyhounds" Annex A
- ^{xxvii} Society of Greyhound Veterinarians. Written submission to APGAW inquiry into welfare issues surrounding racing greyhounds in England
- ^{xxviii} Alistair McLean, Chief Executive of the National Greyhound Racing Club. Letter to Eric Martlew. 5th February 2007
- ^{xxix} Dogs Trust. Written submission to the APGAW inquiry into the welfare issues surrounding racing greyhounds

- ^{xxx} Society of Greyhound Veterinarians. Written submission to APGAW inquiry into welfare issues surrounding racing greyhounds in England
- ^{xxxi} The Greyhounds' Voice "Report to APGAW for their inquiry into welfare of racing greyhounds in England" 9th October 2006 Section 4.2
- ^{xxxii} Alistair McLean, Chief Executive of the National Greyhound Racing Club. Statement given during oral evidence to this inquiry. 11th January 2007.
- ^{xxxiii} Lord David Lipsey. Letter to Eric Martlew MP 17th January 2007
- ^{xxxiv} Ibid
- ^{xxxv} Society of Greyhound Veterinarians. Written submission to APGAW inquiry into welfare issues surrounding racing greyhounds in England
- ^{xxxvi} RSPCA "Response to APGAW inquiry into the welfare of racing greyhounds"
- ^{xxxvii} Society of Greyhound Veterinarians. Written submission to APGAW inquiry into welfare issues surrounding racing greyhounds in England
- ^{xxxviii} Ibid
- ^{xxxix} Dogs Trust. Written submission to the APGAW inquiry into the welfare issues surrounding racing greyhounds
- ^{xl} Ibid
- ^{xli} The Greyhounds' Voice "Report to APGAW for their inquiry into welfare of racing greyhounds in England" 9th October 2006 Section 2.1
- ^{lii} Dogs Trust. Written submission to the APGAW inquiry into the welfare issues surrounding racing greyhounds
- ^{liiii} Figures given to the inquiry by the BGRF
- ^{liiv} Ivor Stocker, Director, Retired Greyhound Trust. Statement given during oral evidence to this inquiry 25th January 2007.
- ^{liv} British Greyhound Racing Fund. Annual Report 2005. p. 2
- ^{lv} Ibid.
- ^{lvii} Tom Kelly, Chief Executive, Association of British Bookmakers. Statement given in oral evidence to this inquiry. 25th January 2007
- ^{lviii} 2005 Figures from BGRF Annual Review 2005
- ^{lix} British Greyhound Racing Board "Evidence for the APGAW inquiry into the Welfare of Racing Greyhounds in England" pp. A-1-A-2.
- ¹ National Greyhound Racing Club Ltd "Submission to the APGAW inquiry into Welfare of Racing Greyhounds in England" p. 4

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