

Peter Hall
Animal Welfare Act Implementation Team
DEFRA
Area 8B
9 Millbank
c/o 17 Smith Square
London
SW1P 3JR

20th July 2009.

Dear Mr Hall,

DEFRA consultation on proposals for Welfare of Racing Greyhounds Regulations 2010

We are writing to voice our concerns about animal welfare issues relating to the racing greyhound industry.

The principal activity of this charity is directed towards rescuing greyhounds in Spain but we also rehome greyhounds in the UK and are founder members of the Greyhound Forum

The UK gambling industry is supported by 30,000 racing greyhounds plus at least as many again being prepared for racing. In an industry whose objects are the entertainment of racegoers and the promotion of gambling, the welfare of the animals they use must take precedence. The regulations as currently drafted will not meet this requirement and will not prevent the unauthorised and unnecessary destruction of healthy dogs.

We believe that regulations must be introduced to ensure better protection for greyhounds and that this should cover them throughout their entire life – from cradle to grave, not just whilst at race tracks or trials. All aspects of welfare within the greyhound industry, from breeding and transportation to handling, racing and retirement, and final euthanasia need to be comprehensively improved.

Any licensing system should not just cover tracks where races and trials are held but also **trainers' and breeders' kennels** where racing greyhounds spend the majority of their lives.

It is important that animal welfare is given proper consideration and an **independent properly trained vet should always be present** at all race meetings and trials and have the proper facilities and expertise to assess and treat greyhounds effectively. In this connection, "independent" means that they should not rely on race tracks and trainers for their livelihoods.

It is also essential that **proper records of injuries** to greyhounds are kept and that these records are made available for public scrutiny on an annual basis in a format that will allow them to be compared and used to improve welfare.

It is absolutely unacceptable that greyhounds should be transported over long distances in **cages too small** to allow them to stand up or turn around. This must be the criterion, rather than an arbitrary minimum size of cage since greyhounds vary considerably in stature.

The report by the Associate Parliamentary Group for Animal Welfare (APGAW) in 2007 found that "*the racing industry produces, at a minimum, a 'surplus' of 13,478 dogs in England and Wales each year [plus] an additional number of unwanted dogs produced by the independent sector*". And "*.. a minimum of 4,728 dogs are unaccounted for each year*" – these are presumed killed by the age of three or four – when their racing days are over. The average life span of a healthy greyhound is around 14 years.

Despite decades of ear marking the industry still fails to track their dogs reliably. So we consider it vital that **all greyhounds should be permanently identified** at 4-6 weeks, and a single central record kept of them through to retirement so that numbers entering and leaving the industry can be more accurately recorded and also made publicly available.

We are convinced that many greyhounds are put down unnecessarily. These regulations should require that **greyhounds only be euthanased by a vet if an injury is untreatable or rehoming is not possible.**

There is a rising tide of public unease about this issue and increasing pressure on the industry to improve its ways and not regard dogs as disposable commodities. Self-regulation by a portion of the industry will not work – it will not stop another Seaham. I urge ministers to apply **statutory regulation by an accountable independent body** to all the greyhound industry as a matter of urgency.

Please find attached our formal response to the consultation questions

Yours sincerely

Martin Humphery
Chairman
Greyhounds in Need

Response to consultation questions on The Welfare of Racing Greyhounds Regulations 2010

Proposal for minimum standards and a licensing scheme

Q1. Do you agree with introducing regulations setting minimum animal welfare standards for all tracks in England, or could this be achieved through a non-regulatory solution?

A1. We agree that regulations should be introduced to set minimum animal welfare standards. The scope of the statutory minimum standards should include not only tracks but also all facilities serving greyhound racing including trainers' and breeders' kennels and transport from the point of import and to/from tracks.

We do not agree that this could be achieved through self-regulation of any portion of the greyhound racing industry. This requires statutory regulation by an accountable independent body.

Q2. Subject to the exemption for tracks belonging to a body that has obtained UKAS accreditation - do you agree that there should be a licensing scheme for greyhound tracks in England?

A2. There should be no exemptions from the requirement set out in A1 above. We do not accept that UKAS accreditation will be of material benefit to the welfare of the dogs.

Exemption for tracks belonging to a UKAS accredited organisation

Q3. Do you agree that if a body applies, at a minimum, those standards required under these regulations at the tracks which it regulates and is accredited by UKAS then any tracks that are affiliated to it should be exempt from the proposed licensing scheme?

A3. There should be no exemptions from the requirement set out in A1 above. We do not accept that UKAS accreditation currently only covering greyhounds at tracks and with no specific welfare standards stipulated will be of material benefit to the welfare of the dogs.

Definitions of racing and trialing

Q4. Do you agree that these licensing conditions should only apply where greyhounds are being raced or trialed?

A4. No. Trials prior to sales (being different from trialing to grade at a track) should also be included.

Q5. Are the definitions of racing and trialing appropriate?

A5. No. Racing must include BAGS and BEGS meetings (where no audience may be present) and trials prior to sales (being different from trialing to grade at a track).

Minimum standards / Licensing conditions

Condition 1: Attendance of a veterinary surgeon

Q6. Do you agree that there should be a veterinarian present at all race meetings and trials?

A6. Yes.

Q7. Do you agree that the veterinarian does not need any specialist qualifications/training other than being a RCVS registered practicing vet?

A7. No. The veterinarian will often have very little time to inspect dogs and pass judgement in the face of experienced trainers. Therefore it is essential that the veterinarian has specialist training and experience of greyhounds and racing injuries.

Also it is vital that the veterinarian is clearly independent – in particular not financially dependent on income from the track(s) and kennels they are inspecting.

Q8. Is the list of desirable qualifications/additional training contained in the draft guidance attached at Annex D suitable? Are there any other qualifications/training that would be desirable?

A8. No. The qualifications listed in Annex D are not adequate and are only "guidance". We support the specific recommendations of the Dogs Trust and RSPCA on this matter.

Q9. Do you agree that the veterinarian must examine each greyhound prior to a race or trial?

A9. Yes. The veterinarian must examine each greyhound before and after each race or trial.

Q10. Do you agree that a register of veterinarian attendance must be kept at the track to demonstrate that a veterinarian has been in attendance and that this register must be kept for at least 3 years?

A10. Yes.

Condition 2: Facilities for the attending veterinary surgeon

Q11. Do you agree that a veterinarian should have access to suitable facilities?

A11. Yes.

Q12. Are the facilities as described here and in Schedule 1 – paragraph 2 of the draft Statutory Instrument attached at Annex C suitable?

A12. Yes.

Q13. Should any permanent room be for the sole use of the veterinarian – including any time when a race or trial is not being undertaken? If you are replying on behalf of a greyhound track, would this require you to build such a room?

A13. Yes.

Condition 3: Kennels

Q14. Do you agree that tracks should provide ventilated kennelling for at least 20% of greyhounds that race? If a different figure is required what evidence is there to support this figure?

A14. Where professional trainers are bringing dogs there should be 100% provision of kennels at tracks. The temperature should be controlled to 10-26 deg C.

Q15. Are the standards proposed here and in Schedule 1 – paragraph 3 of the draft Statutory Instrument attached at Annex C for kennels appropriate?

A15. No. The kennels should have a minimum floor area of 1.9 m² as per the CIEH guidance for Dog Boarding Establishments.

Q16. Should there be a 12 month interval before the requirement to provide kennels applies? If you are replying on behalf of a greyhound track, will this condition require you to build such kennels?

A16. Yes.

Condition 4: Identification of greyhounds

Q17. Should identification by both microchip and tattoo be required or is microchipping alone sufficient?

A17. Both microchipping and tattoo are required. However microchipping, while welcomed, will not on its own enable the tracking of dogs or provide clarity of the numbers involved – for this a proper database is required (refer A18 below). Also, to reduce the number of dogs that disappear between import and first trial, it is desirable that all greyhounds are microchipped and tattooed before any transfer of ownership to a UK buyer.

Q18. Do you agree that only databases which reach the standards set in Schedule 1, Part 2 of the draft Statutory Instrument are appropriate databases for racing greyhounds to be registered on?

A18. No. The onus for accuracy should be placed on the owner of the dog (as per the precedent of vehicle ownership). Also there should be one database covering all greyhounds and including the ownership of the dog and its racing and welfare history from Stud Book entry through to 6 months after retirement. The bulk of this information already exists in the GBGB's publicly accessible central database which, to meet this requirement, needs to be enhanced only to include independent tracks data and stud book entries from the National Coursing Club.

Q19. Do you agree that track managers should be responsible for ensuring that only greyhounds that are appropriately identified and registered are racing or trialling at their track?

A19. Yes.

Condition 5: Record of greyhounds racing

Q20. Are the details to be recorded – as described in paragraph 5 of Schedule 1 of the draft Statutory Instrument and above - appropriate? Are there any other details that should be recorded?

A20. No. The record should also include the name of the inspecting veterinarian and whether an injury has been recorded as described in paragraph 6 of Schedule 1.

Q21. Do you agree that 5 years is an appropriate length of time for records to be kept?

A21. The records should be kept for the duration of the life of the greyhound.

Q22. Should both the owner and the trainer of a greyhound be required to produce identification the first time a greyhound runs at a track?

A22. Yes.

Condition 6: Injury records

Q23. Do you agree that tracks should be required to keep injury records?

A23. No. There should be a single injury database covering all dogs and all tracks and this data should be available for public scrutiny in a format that will allow then to be compared and used to improve welfare. We consider this essential because dogs run at different tracks, analyses to reduce generic track hazards could not be done without a single database, when tracks close the data may be lost, and public scrutiny is essential and can be achieved without breaching the rights of individuals in the

industry. This requirement would be a minor enhancement to the database in A18 above.

Q24. Are the details to be recorded – as described in paragraph 6 of Schedule 1 of the draft Statutory Instrument and above - appropriate? Are there any other details that should be recorded?

A24. No. The location, date and time of the incident should also be recorded.

Q25. Do you agree that 10 years is an appropriate length of time for injury records to be kept?

A25. No. The record should be kept for the lifetime of the dog – typically 13-14 years.

Impact Assessment

Q26. Do you agree that the suggested costs and benefits set out in the Impact Assessment are a reasonable estimate of the likely costs and benefits? If not, can you provide evidence of what any likely costs and benefits should be?

A26. No. The costs of independent inspections of tracks and kennels are overstated as they do not include the use of Authorised Welfare Partners (A29 below refers); the costs relating to databases are overstated given that they already exist for the bulk of the dogs and the industry; the benefits of improved traceability are understated as the Impact Assessment does not include the dogs that disappear each year in the UK between earmarking and registration; and the costs of bringing kennels to an appropriate standard are incorrect (A15 above refers).

Q27. Does the estimated cost of building a new set of kennels seem reasonable? If not, can you provide evidence of what any likely costs and benefits should be?

A27. We have nothing to add to what the Dogs Trust and the RSPCA say on this matter.

Q28. Does the estimated cost of a local authority licence seem reasonable? If not, can you provide evidence of what the likely costs would be?

A28. No. The costs of independent inspections of tracks and kennels are overstated as they do not include the use of Authorised Welfare Partners (A29 below refers).

Draft Statutory Instrument and guidance

Q29. Further to any questions on the draft Statutory Instrument already asked in this consultation, do you have any further comments on the draft Statutory Instrument attached at Annex C?

A29.

First, we consider it essential that the Statutory Instrument contains the requirement for regular inspections of all trainers' and breeders' kennels. Furthermore, the inspectors must be completely independent of the greyhound racing industry. This could be achieved simply with no burden on the tax payer via "Authorised Welfare Partners", such bodies being drawn from an approved list as per the precedent of zoo inspectors.

Second, we consider it essential that the Statutory Instrument contains the requirement for the transport of greyhounds to occur only in cages that enable them to stand up and turn around as per the precedent set by IATA requirements.

Third, we consider it essential that the Statutory Instrument contains the requirement that no greyhound be euthanased except by a vet with documented independent verification that recovery from injury or rehoming are not possible.

Q30. Do you have any comments on the draft guidance attached at Annex D? Is the guidance detailed enough or would it be helpful if the guidance provided a more detailed explanation of all the requirements contained in the regulations?

A30. The draft guidance should be revised to take into account the points we have made above, and should be requirements not guidance.

Glossary

BAGS: Bookmakers Afternoon Greyhound Series

BEGS: Bookmakers Evening Greyhound Series

CIEH: Chartered Institute of Environmental Health

GBGB: Greyhound Board of Great Britain

IATA: International Air Transport Association

RSPCA: Royal Society for the Protection of Cruelty to Animals

UKAS: United Kingdom Accreditation Service