

APGAW response to Defra consultation on proposals for the welfare of racing greyhounds

The Associate Parliamentary Group for Animal Welfare (APGAW) is pleased to be given the opportunity to respond to this consultation and welcomes the fact that some of the recommendations from our report¹ on the welfare of greyhounds have been taken forward.

APGAW hopes that this response will assist in the further refinement of the proposals and that the final draft will protect greyhound welfare. Please see answers to the questions below:

Q1. APGAW believes that regulations should set minimum animal welfare standards for all tracks. Well-regulated greyhound racing can be entirely consistent with good greyhound welfare. As per the report's recommendation we believe there should 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)².

Q2. APGAW agrees that all tracks should be licensed.

Q3. APGAW believes that all tracks should be regulated to the same standard to ensure a consistent approach across the board regardless of whether tracks belong to the GBGB or are independent. If all tracks are accredited to UKAS then APGAW would accept this but not if some were and some were not which could lead to inconsistent standards being applied.

Q4. APGAW is extremely concerned that the proposed draft regulations could be a missed opportunity. Any regulations should provide protection for greyhounds throughout their lives and not just while they are racing at tracks. Incidentally greyhounds spend only a small amount of their time racing at tracks and a significant amount of time in trainers' kennels.

¹ Report of the APGAW inquiry into the welfare issues surrounding racing greyhounds in England, May 2007

² p.36

APGAW believes that tracks and trainers' kennels must be regularly inspected to ensure high welfare standards. These inspections should be monitored and undertaken by those who are independent and have no commercial interest in the premise under inspection³.

Q5. APGAW has no comments on this and believes that welfare organisations and industry may be better placed to comment on this.

Q6. APGAW strongly recommended that it should be compulsory for veterinary attendance at all tracks⁴. As previously mentioned it is also important that vets attending tracks should have financial independence from those tracks.

Q7. APGAW believes that it would be beneficial for the RCVS to introduce a greyhound specialism for the veterinary profession to develop knowledge and skills. It should be noted that vets who attend horse races have postgraduate training as well as mandatory mid-career training and we believe the same should be for greyhound racing.

Q8. APGAW has no comments on this and believes that welfare organisations and industry may be better placed to comment on this.

Q9. Although the inquiry did not get into this level of detail APGAW agrees that a veterinarian must examine each dog before it races or trials. It would be also be beneficial to examine the dog afterwards to ensure no injury has occurred. This information should be recorded so that vets and tracks can use the data to monitor track conditions and the impacts on greyhound welfare as well as developing a better understanding of greyhound physiology.

Q10. APGAW agrees that a record must be kept of all veterinary attendance at any track (and preferably trainers' kennels) and that information must be kept for at least three years.

Q11. APGAW agrees very strongly that a veterinarian should have access to suitable permanent facilities for treating and monitoring greyhounds.

Q12. APGAW has no comments on this and believes that welfare and veterinary organisations are better placed to comment on this.

³ p.27

Q13. Although APGAW believes veterinary and welfare organisations are best placed to comment on this we believe that permanent facilities for a vet should be for their sole use.

Q14. APGAW would agree that all kennels at tracks should be ventilated and does not understand why Defra believes this should only apply to 20 per cent of the greyhounds racing?

Q15. APGAW is not in a position to comment on the specifics of the standards listed and believes that welfare organisations are best placed to comment on the specifics listed. However it should be noted that we recommended that when travelling all greyhounds should be able to stand up at full height and turn around whenever transported⁵ – this should apply equally for kennelling.

Q16. APGAW has no specific comments either way on this.

Q17. APGAW believes it is essential that greyhounds are properly and permanently identified. Following developments in the technology of microchipping we are pleased that the industry is considering the introduction of microchipping. We therefore believe that microchipping should be carefully considered as a possible alternative or additional method of identification of dogs⁶.

Q18. APGAW believes that data should be recorded centrally on one database and such information should be published annually. With regards to what information should be recorded on that database we believe that welfare organisations and industry are better placed to comment on the specifics. For basic information the information listed in schedule 1, part 2 is fine, however if the data is to assist with effective monitoring of greyhounds then injury data should be recorded.

Q19. APGAW agrees that track managers should be responsible for ensuring that only greyhounds that are properly identified and registered are racing or trialing at their track.

Q20. Welfare organisations and industry are best placed to comment on the specific details to be recorded as they have experience of recording such data in a useful manner.

⁴ p.32

⁵ p.29

⁶ p.33

Q21. Although APGAW has no firm views on how long such data should be kept it would seem strange not to keep the data for the greyhound's entire life. If such data was not kept for that long it may be possible for unscrupulous trainers or owners to abuse the system.

Q22. APGAW believes that both the owner and the trainer should be required to produce identification the first time a greyhound runs at any track. But it would be better if this applied every time a greyhound runs at any track.

Q23. APGAW agrees that tracks should be required to keep injury records. APGAW supports the idea of 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 injuries⁷. Furthermore regulations should require the data to be published annually and show three-year rolling averages for injury incidence at named tracks. This should 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 injuries⁸.

Q24. APGAW believes that veterinary and welfare organisations may be best placed to comment on the detail concerning injury data to be recorded.

Q25. APGAW does not hold any strong views either way on this.

Q26. APGAW believes that welfare organisations and industry may be better placed to answer this question.

Q27. APGAW believes that welfare organisations and industry may be better placed to answer this question.

Q28. APGAW believes that if a broad independent regulatory body is set up that includes welfare organisations, industry, veterinarians, etc then it may not be necessary to require local authority involvement in the licensing⁹. That said the GBGB has since been set up and current proposals include local authorities in this process. APGAW has no specific comments on the costings of the proposed system.

⁷ p.31

⁸ p.32

⁹ p.36

Q29. APGAW believes that although the proposed regulations go some way to address the welfare concerns about racing greyhounds whilst at tracks they do not address the following issues:

- ***Numbers of dogs euthanased*** – it should be 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 available¹⁰. This is an important issue and is not addressed in either the draft regulations or guidance.
- ***Licensing of breeders and their premises*** – all greyhound breeders and their premises should be registered if not licensed by the national regulatory body and regularly inspected¹¹. This is important to ensure better protection for greyhounds throughout their lives.
- ***Reorganisation of racing calendar*** – the racing calendar should be reorganised 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 races¹². This may not be suitable for regulations but should be included in guidance to encourage a better and more sustainable approach to greyhound use by the industry.
- ***Increasing the registration fee*** – again another issue that may be best addressed by guidance but we believe that the level of the registration fee should be regularly reviewed and significantly increased¹³.
- ***Regulations should apply to all premises not just tracks*** - as mentioned before we believe that any regulations should apply to all premises where greyhounds are kept and not just when they are racing or trialing.

Q30. APGAW believes that any guidance should provide sufficient information to ensure the welfare of racing greyhounds. At present the document appears to provide very little information and we are concerned this too could be a missed opportunity. It could provide more information and good practice concerning a number of different areas including transport, trainers' kennels, etc which are not currently covered by the regulations.

¹⁰ p.20

¹¹ p.23

¹² p.24

¹³ p.26