

## **Members of the Rural Affairs, Islands and Natural Environment (RAINE) Committee**

Thursday 6<sup>th</sup> April 2023

### **Greyhound Board of Great Britain**

### **Response to the Scottish Animal Welfare Commission's 'Report on the welfare of greyhounds used for racing in Scotland.'**

**April 2023**

#### **Introduction**

The validity and quality of this Scottish Animal Welfare Commission (SAWC) report is undermined by its overreliance on an unpublished report of the RSPCA, Dogs Trust and Blue Cross, and on statements made by those charities (including in Annex III of the SAWC Report).

Point three on page five of the SAWC Report states that SAWC responded to the request from the Rural Affairs and Islands Committee to provide views on the RSPCA, Dogs Trust and Blue Cross' calls for a ban on greyhound racing by forming a working group to 'review the work by Dogs Trust, RSPCA and Blue Cross'. Yet that work, as the SAWC Report states, is not in the public domain despite repeated requests for it to be published. The 'summary of the conclusions of [that] report' included in Annex III of the SAWC Report has been provided by the charities themselves and is not peer reviewed. The statement on page nine of the SAWC Report to the effect that SAWC did not rely on the unpublished report of the RSPCA, Dogs Trust and Blue Cross is not consistent with the unchallenged acceptance throughout the SAWC Report of assertions made in the summary provided at Annex III. Many of those assertions are factually incorrect, as are many of the statements throughout the SAWC Report (see below). The SAWC Report is not objective, and corrections to the inaccuracies within it, as detailed below, should be made in the public domain. It was inappropriate for the SAWC Report to be published without being accompanied by a published version of the entire report of the RSPCA, Dogs Trust and Blue Cross, so that the reader could cross-reference the two reports and evaluate the evidence base behind their findings.

Furthermore, the tone of the SAWC Report is not appropriate for an unbiased, independent piece of work. For example, the statement that 'there may also be more pernicious and challenging aspects of the welfare of racing greyhounds where the practice is inherently bad for the quality of life of the dogs' (p7) is speculative, unsubstantiated and not evidenced. Indeed, the very next sentence questions whether such challenges exist.

#### **Responses to particular points within the SAWC Report**

#### **Section 5 p10: 'GBGB figures are pooled and do not provide stadia-specific evidence for whether participating in some race meets are more hazardous than others'.**

GBGB's annual data is presented as required by the UK Government Department for Environment, Food and Rural Affairs (DEFRA).

GBGB has previously discussed with the Chair of the Greyhound Forum the possibility of providing stadia-specific data. GBGB has also had discussions around this issue with equivalents in the horseracing industry, since the British Horseracing Authority also does not publish track-by-track injury data. The reasons for not currently publishing data on a track-by-track basis include the need to take care when interpreting small data sets and duty of care arguments around potential risks to personnel from 'animal rights' activists.

Within GBGB's published welfare strategy, there is a clear and already-funded commitment to increase the granularity of the GBGB injury database. By the end of April, all track veterinarians will be able to record the name of the greyhound, the type of injury and category of injury on a scale of A-C (A being a minor injury requiring less than 28 days rest period, etc). This will also be supported by the appointment of a data and research analyst, who will be able to appropriately and accurately interpret the data gathered to inform policy development. At the time of writing, the analyst is being recruited.

**Section 5 p10: 'The data are also presented as a proportion of total dog runs and not as a proportion of dogs racing. We are therefore unable to determine accurately the individual risk to each dog of participating in racing'.**

GBGB's annual data is presented as required by the UK Government Department for Environment, Food and Rural Affairs (DEFRA), in the same format as for horseracing.

It is perfectly acceptable to equate injury to race runs, since the run represents the 'risk'. It is not normal to calculate the 'risk' for each racing greyhound, just as there is no sport in which we can model the 'risk' for each individual. To try to do so would require considering data with so much inherent error that the confidence limits would largely be meaningless.

Rather, the models are based on the significant risks, with apparent risks that are too noisy from the data quality aspect being excluded and accepted as unallocated error. This is a known limitation of probabilistic analysis.

**Section 5 p10: 'However, based on the data that 18,302 dogs were eligible to race in 2021, we estimate that (with the assumption that all dogs eligible to race did race, that all dogs raced an equivalent amount, that each dog would only sustain one injury per year and all dogs are equally at risk of injury or fatality in any given race) that any greyhound taking part in GBGB-regulated racing in 2021 had a 24.1% risk of incurring an injury that year, and a 0.66% risk of dying at the track. The actual figures for some dogs may be considerably higher (if they race more frequently, or race on tracks that are inherently more dangerous). There are also no figures for the number of dogs that are injured in training. It should be noted that racing animals are known to sustain unique injuries that are seldom seen in other breeds of dog, particularly hock injuries of the right hindleg. Data from 2715 companion greyhounds collected from 626 primary care veterinary clinics in 2016 suggest that 10% of greyhounds had traumatic injuries that might be equivalent to those presented in Table 1, of which nearly a third were claw injuries (which may be those identified as other above)'.**

There are assumptions here that are not valid and not representative of the racing greyhound population. These assumptions produce unrealistic measures, such as their suggestion of a 24.1% risk of injury which is not matched by the observed rate of 1.1 to 1.2%. Likewise, the risk of dying is over-estimated by a factor of 20.

**Section 5 p10: *'Whilst not directly comparable it does suggest that the risk of injury is significantly higher in the racing greyhound population'*.**

It is unsurprising that the risk of athletic injuries is higher in athletic dogs than it is in non-athletic dogs – the same would be true of equine athletes and non-athletes, and of human athletes and non-athletes.

**Section 5 p10: *'The GBGB report highlights that although the injury rate of 1.23% in 2021 is up from 1.12% in 2020 (an increase of 23.7% when considering the increase in the number of dog runs)'*.**

The year 2020 included the non-racing period during Covid, due to the national lockdown. This is likely to have had an influence on the injury rate being slightly lower than other years. In fact, the 2021 injury rate is not significantly different from 2018 and 2019, it is just that the 2020 rate is not representative of the mean.

Low percentages are very misleading since the error term can easily be of the same magnitude as the value you are trying to model. Likewise, comparing small numbers leads to inaccurate ratios. This will always be the problem of the statistics of small numbers in large populations.

**Section 5 p10: *'Early detection may help to identify dogs that are at risk of sustaining a racing injury, but this may require more thorough diagnostic tools to allow for detection, which are currently not commonly available at racetracks'*.**

The reason that such diagnostic tools are not currently commonly available is that they have not been validated for use in racing greyhounds. The paper to which the SAWC Report refers (Palmer, A. L., Rogers, C. W., Stafford, K. J., Gal, A. & Bolwell, C. F. 2021. Risk-Factors for Soft-Tissue Injuries, Lacerations and Fractures During Racing in Greyhounds in New Zealand. Front Vet Sci, 8, 737146.) states only that *'more thorough diagnostic tools are required'* but did not specify what those might be, nor study the use of any such tool.

The importance of early detection of injuries is mentioned five times within GBGB's welfare strategy 'A Good Life for Every Greyhound'. GBGB agrees that new technologies or diagnostic tools may facilitate early detection. GBGB also pursues an evidence-based approach to welfare. New technologies *may* have a role to facilitate in such early detection, but that needs to be established. Therefore, within GBGB's welfare strategy (p74) it is written: *'GBGB will facilitate research guided by Dr Richard Payne assessing whether the adoption of technologies to detect early injury could help prevent greyhound injuries'*. Funding for this research is available. It is expected to start during the current year, with co-supervision from a veterinary surgeon who is an expert in using such technologies to detect early injuries in horses.

**Section 5 p13: *'We did not observe the dogs in these conditions, although research in Australia suggests that time spent in the kennels at the racetrack can contribute to stress at race meets'*.**

It is inappropriate for SAWC to be making such statements based on one paper from a country in which the environmental and specific conditions at racetrack kennels may be very different from those in the UK, particularly when SAWC did not observe any greyhounds in racetrack kennels themselves.

The inspection and licencing of GBGB racecourses have been UKAS accredited since 2010. Track kennels are inspected as part of the annual UKAS-accredited racecourse inspection. Stipendiary Stewards additionally visit each of their designated racecourses twice monthly to ensure continuing compliance with the certification inspection. Each visit is recorded on the GBGB registry database, and areas of noncompliance are identified and brought to the attention of the management for corrective action. Failure to make the corrective actions can result in disciplinary findings.

Whilst in racetrack kennels, greyhounds are under the care of the designated track veterinary surgeon, who also inspects each greyhound before kennelling, before running and after running. Around 90% of all stadia kennels are air conditioned. Water in kennels has been a requirement since 2014, and details/recommendations around this have been regularly updated by GBGB's Welfare and Veterinary Standing Committee (WVSC). The maintenance of track kennels is the responsibility of the track management and a condition of licensing.

**Section 5 p14: *'Approximately 4-5 dogs had visible areas of coat loss, on the haunches and tail, which in some cases looked possibly consistent with rubbing on wire'*.**

This is conjecture and inappropriate. It is not clear who undertook any examination, nor what their qualifications were for assessing the greyhounds' condition.

**Section 5 p15: *'Studies in other dog breeds also exist and together suggest that the biggest impact on the welfare of kennelled dogs is lack of social contact'*.**

In fact, it is very common at GBGB licensed trainers' residential kennels for greyhounds to be kennelled in pairs. However, greyhounds shall be appropriately housed according to the specific needs of the individual greyhound, which may necessitate either pair housing or single housing.

They are lead walked in pairs, or singly, or as part of a larger group, and should have access to secure, free-roaming areas – such as paddocks – together with their kennelmate when housed in compatible pairs. Regular positive contact and appropriate positive social interactions with their human carers should also take place, for example via massage.

**Section 5 p16: *'The lack of any data preclude us from reaching any firm conclusions about the welfare of dogs in early life before they embark on a racing career, or their parents'* .**

GBGB's welfare strategy has an entire chapter about welfare during the early years of a greyhound's life. GBGB has partnered with the Kennel Club (KC), a member of the Greyhound Forum, to develop and implement a high-welfare-standard 'Assured Breeders Scheme' (with UKAS accreditation) specifically for greyhounds. This is a currently funded action. The scheme is currently under development, and we expect to pilot it later in 2023.

Once finalised, GBGB will promote high-standard British breeding through this KC Assured Breeders Scheme, including encouraging owners and trainers to purchase greyhounds from British breeders who are members of that scheme. GBGB will incentivise early joining of the KC Assured Breeders Scheme by funding application fees for the first two years of the scheme being available to breeders of greyhounds for racing. GBGB will also aim to use the KC Assured Breeders Scheme and the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 as a basis for working with Greyhound Racing Ireland and the Irish Coursing Club to encourage them to support a harmonised set of standards and code of practice of breeders in the UK, Northern Ireland and the Republic of Ireland (ROI).

As indicated in the welfare strategy, GBGB is already working with the Greyhound Stud Book to identify breeders of racing greyhounds who fall and do not fall under the scope of the Breeding of Dogs Regulations (for example, those breeding three or more litters per year) and/or the Selling Animals as Pets Regulations, as well as to ensure that breeders within that scope are compliant with legal requirements. GBGB is also collaborating with the Greyhound Forum, in particular calling on the expertise of Battersea Dogs and Cats Home, to consider and make recommendations around how traceability of greyhounds bred for racing but not entering racing can be improved.

**Section 5 p17: *'Some injuries are not disclosed and are found upon examination after rescue, again suggesting inadequate veterinary care for injuries'* .**

For greyhounds racing at GBGB-licensed tracks, all injuries are recorded by the designated track veterinary surgeon, who is in attendance throughout any racing or trialling session. Each racing greyhound is checked by a vet both before and after any racing and will not race if the vet says it should not. Immediate first aid, if necessary, is provided by the track vets, with onward referral where appropriate.

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GBGB's Executive Veterinarian (appointed in July 2022, in line with the welfare strategy as published) is conducting an ongoing audit of presentation for further treatment at a local or



referral veterinary surgeon of greyhounds who were issued with a veterinary certificate to travel following an injury at a track. This is to ensure that the trainer has sought the recommended veterinary follow-up care or treatment. If it is found that a trainer has not complied with the instructions provided on the transport certificate, they will be instructed that the greyhound should be promptly taken for a veterinary check-up, which needs to be evidenced. Non-compliance will also be treated as a disciplinary matter. The recruitment of GBGB's new Regional Regulatory Veterinary Surgeons further enhances this follow-up procedure.

GBGB is completely clear that it is the responsibility of trainers and ultimately, legally, of the owners, to ensure that greyhounds receive prompt veterinary care. Failure to provide such care or receipt of reports to GBGB from a homing centre that a greyhound had been presented for homing with an untreated injury would result in disciplinary proceedings.

**Section 5 p18 '*...we are strongly of the view that independent regulation or oversight of these activities is required to safeguard the welfare of the animals*'.**

We disagree. The Board of GBGB includes four Independent Directors, one of whom is the Chair. It additionally includes a Veterinary Director.

The Chair of GBGB was previously Chief Executive of the RSPCA and a Director at Dogs Trust. Among the Independent Directors: one is a RCVS and European Veterinary Specialist in Animal Welfare Science, Ethics and Law; one has a strong background in animal welfare, having served as Shadow Environment Minister and as a Senior Member of EFRACOM; one is a partner in a solicitors' firm with decades of experience in regulatory and disciplinary law and a particular specialism in sports law and governance.

The Greyhound Regulatory Board, which has status independent of GBGB, is charged with implementing and managing the Rules of Racing. This includes investigating any alleged breaches; the licensing of racecourses, trainers, kennel staff and track officials; the registration of owners and their racing greyhounds; managing GBGB's drug sampling programme and setting standards to safeguard the sport's integrity. Breaches of GBGB's Rules of Racing are brought before GBGB's Disciplinary Committee, which is made up of independent members, which include lawyers, a veterinary surgeon and an experienced sport stakeholder (an ex-racing officer). GBGB, under UKAS accreditation requirements, additionally has an Impartiality Committee. This Committee is made up of a lawyer, veterinary surgeon, Greyhound Forum member and a senior Animal Licensing Officer. The Impartiality Committee have oversight of the licensing processes and procedures of GBGB-registered Stadia, including oversight of non-conformities.

The combination of regulatory structure and independent expertise across the GBGB Board, the Greyhound Regulatory Board, the Disciplinary Panel and the Impartiality Committee ensures robust safeguarding of animal welfare.

GBGB also notes that British horseracing, like GBGB-licensed greyhound racing, is self-regulated.

**Section 5 p19. *'There is no.....evidence that track design might be modified to reduce risk....'***

This statement is factually incorrect. Within GBGB's welfare strategy there are eight mentions of track design, and a clear commitment to a well-directed programme of research and international information-sharing which informs track design.

This programme is already under way, with track design having been a key topic of discussion at the First Welfare Meeting of International Greyhound Regulators, convened by the GBGB in March 2023. A welfare portal has been established and hosted by GBGB on which international regulators can share research into track design. GBGB will commission Dr Richard Payne, Associate Professor of Veterinary Anatomy, School of Veterinary Medicine and Science, University of Nottingham, and scientific and veterinary advisor to GBGB's Welfare and Veterinary Standing Committee to undertake a review of where an evidence base already exists and where further research is needed around track design. This will inform GBGB's commissioning of research and development of policy and practice going forward.

**Section 5 p19: *'...the Welfare Strategy cites work with the Kennel Club to produce an 'Assured Breeders Scheme' for greyhounds (although this scheme covers all breeds and predates the Welfare Strategy)'***

This statement is factually incorrect. SAWC appears to have misunderstood GBGB's welfare strategy. The *existing* Kennel Club Assured Breeders Scheme is not being applied to the breeding of greyhounds. Rather, the Kennel Club, as a member of the Greyhound Forum, has kindly agreed to help GBGB develop a bespoke assured breeding scheme specifically for racing greyhounds. This work is already funded and already under way. The scheme will be UKAS accredited.

**Section 5 p20: *'Although the strategy does express a desire to work with the ICC on this matter, whether this will achieve an impact is yet to be seen. In our discussions with dog owners there appeared to be no incentive to buy British-bred dogs and it was considered routine to import greyhounds for racing from Ireland, even for those who might identify as 'hobby' breeders.'***

GBGB's welfare strategy was published less than a year ago. The Irish Coursing Club (ICC) participated in the First Welfare Meeting of International Greyhound Regulators, convened by the GBGB in March 2023. A team from GBGB will also be visiting Ireland during 2023 specifically to work on breeding matters with the ICC, including the development of a harmonised set of welfare standards for breeding.

As set out already, the Kennel Club (KC) Assured Breeders Scheme will be used by GBGB to encourage owners and trainers to purchase high-welfare greyhounds from British breeders. GBGB will incentivise early joining of the KC Assured Breeders Scheme by funding application

fees for the first two years of the scheme being available to breeders of greyhounds for racing. Additionally, GBGB's Commercial Director is working with racecourses and owners to continue to develop incentives for breeding and owning British Bred greyhounds.

The anecdotal statements quoted by the SAWC Report above suggest a lack of understanding of licensed greyhound racing and the strides already made to support British breeding. In 2022, more British-bred greyhounds reached the finals of Category One competitions than ever before. Most notably, the 2022 English Greyhound Derby was won by the British-bred Romeo Magico.

**Section 5 p20: '.....by the report from Dogs Trust that GBGB have, since Dogs Trust called for a phased end of greyhound racing in September 2022, stopped providing £400 per rehomed dog to the charity'.**

The GBGB policy has, since September 2020, been not to provide financial support for homing organisations which support a ban on greyhound racing. The Dogs Trust and RSPCA were well aware of this when they called for a ban on greyhound racing.

Half of the funding for the Greyhound Retirement Scheme (GRS) is generated by greyhound owners within the sport, who pay into the GRS on registering any racing greyhound with GBGB. Consideration has been taken on their views when setting the policy not to allow funding to be allocated to charities who are actively campaigning against the sport.

GBGB's commitment to homing of greyhounds after their retirement from racing is unwavering. Since the GRS launch in September 2020, GBGB has paid out over £3 million, for circa 8,000 individual greyhounds, to support our growing network of over 100 approved homing centres.

In 2022, the Dogs Trust took in 90 greyhounds for homing. The RSPCA took 24 and the Blue Cross 9 greyhounds. The total of these numbers represents just 2.78% of the total number of 4,420 greyhounds that went for homing that year.

GBGB is working directly with the Greyhound Trust, a canine charity member of the Greyhound Forum, on a series of promotional activities to encourage retired greyhound ownership, and on learning materials to support the owners of retired greyhounds. This work is already funded and underway.

**Section 5 p20: 'However, there is rather less attention given to behavioural issues and the mental state of dogs, even though these are equally important domains in the Five Domains model of welfare'.**

This is factually incorrect. There are 41 mentions of behaviour within the welfare strategy. GBGB is currently drawing on the kindly offered expertise within the Greyhound Trust and Battersea Dogs and Cats Home – both charity members of the Greyhound Forum – to provide educational materials for owners of retired greyhounds about greyhounds behavioural needs.



GBGB is also working both with the Greyhound Trust and with an external specialist in Canine Behaviour to develop (i) a programme for breeders, rearers and trainers focused on managing the racing greyhounds whilst under their care in such a way so as to smooth the greyhounds' transition to domestic life at the point of retirement and (ii) a standardised behavioural assessment for greyhounds which can be used by all homing centres.

GBGB is further working with The Greyhound Trust on developing (i) a network of recommended canine behaviourists on whom individual homing centres can call for advice, and (ii) a nationalised system for referring those few greyhounds who have presented with challenging behaviours at the time of retirement to one centre of excellence in greyhound behaviour so that those greyhounds can be given the best possible specialist care. All this work is currently funded and under way.

***Section 5 p20: The Welfare Strategy (Chapter 2, pp 29) suggests that the AWAG will be used by owners, breeders and trainers, as well as veterinarians and stewards. Although we agree this can help with welfare engagement when used by owners or trainers, it does also risk unconscious or deliberate bias in the assessment of welfare improvements (for example, if a change is made, a trainer might expect to see an improvement and will be biased towards assessing this as improving welfare).***

This is factually incorrect. Professor Sarah Wolfensohn's Animal Welfare Assessment Grid (AWAG) is an objective, not a subjective tool. It has been validated through original research published in peer-reviewed journals. Regular monitoring provides users with an overview of the key factors that may influence greyhound wellbeing and encourages the users to consider the animal's psychological as well as physical health, the environment, and husbandry procedures.

Whilst trainers and/or their allocated kennel-hands will be set up as "Users" and able to enter data and record welfare assessments for each racing greyhound within their residential kennels, GBGB Stipendiary Stewards and GBGB Regional Regulatory Veterinary Surgeons will also be set up as "Users" and hence will be able to use the Greyhound AWAG tool to quantify and objectively score greyhound welfare during their respective kennel visits which will further facilitate regular and objective welfare monitoring. The same greyhound will be evaluated over multiple occasions not only by the trainer but also by Regional Regulatory Vets and Stipendiary Stewards. Within the AWAG tool each of the scores from 1-10 are defined and the published validation of the AWAG and its use has shown that the between observer variation is minimal (Malkani R, Paramasivam S and Wolfensohn S (2022) Preliminary validation of a novel tool to assess dog welfare: The Animal Welfare Assessment Grid. Front. Vet. Sci. 9:940017. doi: 10.3389/fvets.2022.940017).

***Section 5 p22, paragraphs on the work which Professor Emmeline Hill will be commissioned by GBGB to undertake on breeding for resilience:***

Far from relying on the results of one PhD as the SAWC Report suggests, GBGB is drawing on the internationally acclaimed independent expertise of Professor Hill to help understand the

genetic basis of predisposition to injury in order to select against it. This workstream is in no way an *alternative* to management methods of optimising welfare, but an addition to them.

Whilst accepting and indeed indicating within GBGB's welfare strategy that the impacts of such research will take some time to be realised, GBGB believes that it would be irresponsible not to make use of modern technologies *alongside* existing methods of management to optimise welfare as fully as possible.

**Section 5 p21: *'GBGB has since confirmed that the involvement of some bookmakers has been agreed, with discussions still ongoing'*.**

The short-term workstream specified within the welfare strategy is currently on-going, on-target and fully funded.

**Section 5 p21: *'We also have some concerns about the ability of GBGB to enforce changes in the industry. Although it is the regulator, representations from RSPCA suggested that it had only limited powers to compel greyhound stadia to make changes'*.**

The inspection and licensing of racecourses have been UKAS accredited since 2010. Track kennels are inspected as part of the annual UKAS-accredited racecourse inspection. Stipendiary Stewards visit each of their designated racecourses twice monthly to ensure continuing compliance with the certification inspection. Each visit is recorded on the GBGB registry database, and areas of noncompliance are identified and brought to the attention of the management for corrective action. Failure to make the corrective actions can result in disciplinary findings.

**Section 5 p21: *(GBGB's) jurisdiction is also limited to the time that greyhounds spend at the racetrack, and does not cover the bulk of the life of the greyhound .....away from the track'*.**

This is factually incorrect. Whilst it is true that The Welfare of Racing Greyhound Regulations 2010 do not cover trainers' residential kennels, GBGB has stringent oversight of the welfare of greyhounds away from the racetrack. All licensed trainers are required to be compliant with PAS 251: 2017 'Specification of greyhound trainers' residential kennels', and GBGB Rule of Racing 212 (Minimum requirements for all residential Licensed Kennels and Transportation of Greyhounds).

GBGB-licensed residential kennels are visited by an external, independent kennel auditor once a year, which is a condition of licensing, and the audit is undertaken to ensure PAS 251:2017 compliance. GBGB is working to gain UKAS accreditation for the licensing of trainers' residential kennels; the undertaking of external kennel audits is a part of the UKAS accreditation process. All licensed trainers' residential kennel facilities are additionally inspected by the local Stipendiary Steward on a random basis, at least twice annually. Additional kennel inspections are carried out by Stipendiary Stewards on a risk-assessment. The welfare strategy also introduced inspections of residential kennels by the new Regional Regulatory Vets, and those inspections are funded and already being undertaken.

Every routine kennel inspection is carried out to verify that standards and facilities are being maintained in accordance with the Rules of Racing and the directions of the Director of Regulation, and that trainers and kennel staff are correctly licensed. Where kennel standards are not being maintained to the GBGB requirements as determined by the Stipendiary Steward or Regional Regulatory Vet, through the use of inspection forms and other appropriate means, this is notified to the applicant through a 'GBGB Improvement Notice' from the Stipendiary Steward or other means as deemed by the Director of Regulation.

All licensed trainers are additionally required to have an Annual Veterinary Kennel Inspection to be compliant with PAS 251: 'Specification of greyhound trainers' residential kennels', and GBGB Rule of Racing 212 (Minimum requirements for all residential Licensed Kennels and Transportation of Greyhounds). The Regional Regulatory Vets will shortly take over responsibility for conducting the annual veterinary kennel inspections at trainers' residential kennels, involving the hands-on inspection of all greyhounds being accommodated within GBGB licensed residential kennels, including retired greyhounds.

GBGB also has a Code of Practice for licensed trainers' residential greyhound kennels. A 'Code of Practice', in general, provides animal keepers with information on how to meet their animal charges health and welfare needs, as required under the AWA (2006). A Code of Practice helps animal keepers to understand how they can comply with statutory Regulations and aims to encourage animal keepers to adopt the highest standards of animal husbandry and care. A Code of Practice may also be used as evidence in cases where poor welfare standards are alleged. Hence, if there was a GBGB Disciplinary Committee (DC) hearing involving a welfare case, the trainer's compliance with the relevant recommendations in the GBGB Code of Practice could potentially be used/cited as evidence at the DC hearing. Regular welfare updates are already being issued to trainers that act to re-enforce various sections of advice in the GBGB Code of Practice – e.g. on 6 February 2023 a welfare update titled "Parasite treatment and control" was issued and aimed to remind trainers that they should be aware of the source of infection, prevention, symptoms and treatment of common internal parasites including roundworms, hookworms, lungworms and tapeworms and external parasites such as lice, mites, ticks and fleas. This update also covered key topics including biosecurity and quarantine of new kennel arrivals and advice on purchasing safe and effective anti-parasitic treatments.

Other 'Welfare updates' to trainers have included fireworks advice, antimicrobial stewardship, the GBGB hot weather and GBGB cold weather policies, and most recently, greyhound vaccinations, with the overall purpose of these updates being to support trainers with their kennel husbandry and management.

***Section 5 p 21-22: 'A considerable part of the planned actions to improve greyhound welfare presented by GBGB relies on education and other activities from external collaborators, which are chiefly the charities involved in the Greyhound Forum, Dogs Trust and RSPCA. Representatives from these organisations told us that their involvement in the Welfare Strategy was limited to an initial consultation'.***

The involvement of external collaborators in the drafting and delivery of the GBGB welfare strategy, far from being a weakness, is a strength which evidences the GBGB's determination to make use of national and international expertise in animal welfare to deliver 'A Good Life for Every Greyhound'.

Currently funded collaborations with the University of Nottingham, University of Surrey, and Dr Theresa Hollands as specified in the strategy are already under way. The collaboration with Prof Emmeline Hill is funded and about to start. Whilst GBGB regrets the RSPCA and Dogs Trust's change of policy and call for a ban on greyhound racing, GBGB has actively continued to work with those charities through the Greyhound Forum.

GBGB and other members of the Greyhound Forum have, through the Chair, formally asked the RSPCA and Dogs Trust to share the report on which they have based their call for a ban with the Forum, in order that we might all understand what those charities think is lacking from the GBGB welfare strategy and address that. The RSPCA and Dogs Trust have so far failed to answer that request.

Meanwhile, GBGB is continuing to actively work with members of the Greyhound Forum, as already detailed and in following sections, to action welfare strategy objectives.

***Section 5 p22. 'Whether these will now go ahead, given the change in policy at these organisations, was not clear to us from our conversations with all parties involved'.***

None of the actions specified within GBGB's welfare strategy which involve collaborations with the Greyhound Forum are affected by the RSPCA and Dogs Trust's change of policy to call for a ban, and all will be completed as planned. Many of these actions are already underway.

For example, GBGB is currently working with Greyhound Forum members on education about behaviour (Battersea Dogs and Cats Home and Greyhound Trust); good welfare around breeding (The Kennel Club); provision of expertise in canine behaviour and of programmes designed to manage greyhounds in early life in ways consistent with facilitating an easy behavioural transition to domestic life after retirement (Greyhound Trust), promotion of ownership of retired greyhounds (Greyhound Trust) and traceability (Battersea Dogs and Cats Home). This work is all funded.

***Appendix III p27 '... is heavily reliant on other stakeholders to ensure its delivery and is severely lacking in the funding to achieve its aims'.***

The involvement of external collaborators in the drafting and delivery of the GBGB welfare strategy, far from being a weakness, is a strength which evidences the GBGB's determination to make use of national and international expertise in animal welfare to deliver 'A Good Life for Every Greyhound'.

The preceding paragraphs provide multiple examples of where the work being undertaken through such collaborations is already underway, and funded. Far from 'severely lacking' funding, the entirety of the short term (first 18 months) of the work within GBGB's welfare strategy has funding in place, meaning that the strategy is being delivered according to the stated timetable. Funding for the medium to long term is currently being finalised.

**Appendix III p27. 'The UK Greyhound Forum is intended to provide a mechanism to improve greyhound welfare. However, industry representation is limited, as well as the ability of GBGB to act on any welfare recommendations'.**

GBGB has recently agreed with the Greyhound Forum that a representative from the greyhound racecourse promoters (RCPA) should join the forum, which will increase industry representation. We do not understand this statement by the RSPCA since there are no limitations that we are aware of on GBGB's ability to act on any welfare recommendations.

**Appendix III p 28: 'Since 2018, following a non-regulatory agreement with Defra, the Greyhound Board of Great Britain has published annual data on injuries, euthanasia and rehoming. This data has shown that significant numbers of greyhounds are injured and euthanised every year (Table 1). However, there is a lack of clarity around these categories making comparisons of change or progress over multiple years very challenging and raising questions around the transparency of the regulated industry. Furthermore, citing the percentage of injuries and deaths as a proportion of dog runs, which is a very large number, means that the percentage results will be very small and therefore the result will always be a low percentage.'**

We would challenge what is meant by 'significant numbers' in this statement. Figures on injuries and retirements for GBGB-licensed greyhound racing are in line with that of British horseracing. Likewise, the suggestion of a lack of clarity around comparisons of change are unexplained.

As already set out, GBGB's annual data is presented as required by the UK Government Department for Environment, Food and Rural Affairs (DEFRA), in the same format as for horseracing. It is perfectly acceptable to equate injury to race runs, since the run represents the 'risk'. It is not normal to calculate the 'risk' for each racing greyhound, just as there is no sport in which we can model the 'risk' for each individual.

Calculations can be made in many different ways in order to see patterns within the data. It is difficult to present both detail and an overview in the same discourse, and by its nature an overview calculation will be resistant to change due to regression towards the mean. Expressing overall rates as a percentage of dog runs, therefore, is a reasonable way of creating an overview of trends across the licensed sport.



**Appendix III p29 ‘at the time of the Dogs Trust and RSPCA review, many actions within the GBGB’s welfare strategy were unfunded: 46% of short term, 53% of mid-term and 80% of long term actions’.**

The entirety of the short term (first 18 months) of the work within GBGB’s welfare strategy has funding in place, meaning that the strategy is being delivered according to the stated timetable. Funding for the medium to long term is currently being finalised.

**Appendix III p30: ‘There are a myriad of welfare issues reported to affect greyhounds at every stage of their life cycle. To give just some examples, these include the use of artificial insemination for breeding...’**

It is far from clear that artificial breeding (unless being used on brachycephalic dogs) is detrimental to canine welfare. Indeed it offers some positive welfare advantages, including the removal of the need to transport bitches and dogs and the possibility of using semen from international sources to maintain genetic diversity.

**Appendix III p30. ‘Inappropriate transportation’**

GBGB has specific rules relating to the transportation of greyhounds as set out in Appendix II of its Rules of Racing which references both UK and retained EU legislation on the welfare of transporting animal for economic activity. Furthermore, all GBGB trainers are registered with the Animal, Plant and Health Agency (APHA) and are issued with either a Type 1 or Type 2 Transporter Authorisation Certificate. From 01 April 2023, all vehicles used to transport greyhounds must be air conditioned and capable of maintaining that vehicle temperature within a greyhound’s thermo- neutral zone of 10-26°C. Since June 2021, in excess of £2 million has been spent within the industry on replacement vehicles or upgrading existing air conditioning units to meet these new requirements.

**Appendix III p 30 ‘Impacts of extreme weather’.**

GBGB’s evidence-based policies on racing in hot and cold weather extremes have been a key component of its Greyhound Commitment for years. The policies are reviewed annually to ensure that they are based on the latest veterinary and scientific research. Provision under these policies includes, for example, cooling baths at racetrack kennels and reduced parade times and guidance to tracks about when racing can continue and should be abandoned in hot environmental conditions.

**Appendix III p30: ‘For example, the Welfare of Racing Greyhound Regulations (2010) only apply to England and only to the time greyhounds spend at the race track; not to the other stages of their lives, in particular the trainers’ kennels where they spend most of their time’ and ‘Given that many greyhounds spend the vast majority of their time in trainers’ kennels, this is critical, especially as a Dogs Trust investigation in 2015 provided stark evidence that the current regulations are insufficient to address the welfare concerns associated with trainers’ kennels’.**

This statement has a very outdated basis. The investigation referenced well predates recent years in which regulations and kennel welfare standards have been strengthened and improved. Indeed, it illustrates the progress which the regulated sector of the sport has made and continues to make to promote and protect greyhound welfare.

Whilst it is true that The Welfare of Racing Greyhound Regulations 2010 do not cover trainers' residential kennels, GBGB has stringent oversight of the welfare of greyhounds away from the racetrack. All licensed trainers are required to be compliant with PAS 251: 2017 'Specification of greyhound trainers' residential kennels', and GBGB Rule of Racing 212 (Minimum requirements for all residential Licensed Kennels and Transportation of Greyhounds).

GBGB-licensed residential kennels are visited by an external, independent kennel auditor once a year, which is a condition of licensing, and the audit is undertaken to ensure PAS 251:2017 compliance. GBGB is working to gain UKAS accreditation for the licensing of trainers' residential kennels; the undertaking of external kennel audits is a part of the UKAS accreditation process. All licensed trainers' residential kennel facilities are additionally inspected by the local Stipendiary Steward on a random basis, at least twice annually. Additional kennel inspections are carried out by Stipendiary Stewards on a risk-assessment. The welfare strategy also introduced inspections of residential kennels by the new Regional Regulatory Vets, and those inspections are funded and already being undertaken.

Every routine kennel inspection is carried out to verify that standards and facilities are being maintained in accordance with the Rules of Racing and the directions of the Director of Regulation, and that trainers and kennel staff are correctly licensed. Where kennel standards are not being maintained to the GBGB requirements as determined by the Stipendiary Steward or Regional Regulatory Vet, through the use of inspection forms and other appropriate means, this is notified to the applicant through a 'GBGB Improvement Notice' from the Stipendiary Steward or other means as deemed by the Director of Regulation.

All licensed trainers are additionally required to have an Annual Veterinary Kennel Inspection to be compliant with PAS 251: 'Specification of greyhound trainers' residential kennels', and GBGB Rule of Racing 212 (Minimum requirements for all residential Licensed Kennels and Transportation of Greyhounds). The Regional Regulatory Vets will shortly take over responsibility for conducting the annual veterinary kennel inspections at trainers' residential kennels, involving the hands-on inspection of all greyhounds being accommodated within GBGB licensed residential kennels, including retired greyhounds.

GBGB also has a Code of Practice for licensed trainers' residential greyhound kennels. A 'Code of Practice', in general, provides animal keepers with information on how to meet their animal charges health and welfare needs, as required under the AWA (2006). A Code of Practice helps animal keepers to understand how they can comply with statutory Regulations and aims to encourage animal keepers to adopt the highest standards of animal husbandry and care. A Code of Practice may also be used as evidence in cases where poor welfare standards are alleged. Hence, if there was a GBGB DC hearing involving a welfare case, the trainer's compliance with the relevant recommendations in the GBGB Code of Practice could

potentially be used/cited as evidence at the DC hearing. Regular welfare updates are already being issued to trainers that act to re-enforce various sections of advice in the GBGB Code of Practice – e.g. on 6<sup>th</sup> Feb 2023 a welfare update titled “Parasite treatment and control” was issued and aimed to remind trainers that they should be aware of the source of infection, prevention, symptoms and treatment of common internal parasites including roundworms, hookworms, lungworms and tapeworms and external parasites such as lice, mites, ticks and fleas. This update also covered key topics including biosecurity and quarantine of new kennel arrivals and advice on purchasing safe and effective anti-parasitic treatments.

Other ‘Welfare updates’ to trainers have included fireworks advice, antimicrobial stewardship, the GBGB hot weather and GBGB cold weather policies, and most recently, greyhound vaccinations, with the overall purpose of these updates being to support trainers with their kennel husbandry and management.

### **Appendix III p 31, *traceability***

GBGB’s welfare strategy contains twenty-one mentions of traceability and a section on that subject. The strategy includes workstreams to reduce the risk of greyhounds exiting the tracing system and to improve methods of identification, and GBGB is collaborating with the Greyhound Stud Book, The Greyhound Forum and Irish counterparts on that work. A recent example of international collaboration to improve both traceability and biosecurity is the agreement reached that from 01 March 2023, GBGB would only accept greyhounds imported from Ireland either directly or via Sales meetings that come with a valid Pet Passport ( as a requirement under the EU Pet Travel Scheme and as a condition of Balai (commercial movements)), in addition to a record of the core vaccinations. This has the full support of the Irish greyhound authorities with the ambition to digitalise the process through the GRI and GBGB digitalisation arrangements when we simultaneously move away from paper records.

### **Appendix III p 32 *‘robust provisions provided by the welfare members (of the greyhound forum) are typically rejected by GBGB.’***

This is an unsubstantiated statement which we reject. GBGB asked all members of the Greyhound Forum for their detailed views as we started to draft the welfare strategy, and every suggestion received was considered within the strategy. As evidence in the preceding pages, GBGB is working actively and constructively with the Greyhound Forum on a large number of projects within the welfare strategy.

### **Appendix III p34: *‘This reliance on partnership working calls into question the likelihood of, and ability for, the strategy being fulfilled.’***

The involvement of external collaborators in the drafting and delivery of the GBGB welfare strategy, far from being a weakness, is a strength which evidences the GBGB’s determination to make use of national and international expertise in animal welfare to deliver ‘A Good Life for Every Greyhound’.

Currently funded collaborations with the University of Nottingham, University of Surrey, and Dr Theresa Hollands as specified in the strategy are already under way. The collaboration with Prof Emmeline Hill is funded and about to start. None of the actions specified within the GBGB's welfare strategy which involved collaborations with the Greyhound Forum are affected by the RSPCA and Dogs Trust's change of policy to call for a ban, and all will be completed as planned. Many of these actions are already underway.

For example, GBGB is currently working with Greyhound Forum members on education about behaviour (Battersea Dogs and Cats Home and Greyhound Trust); good welfare around breeding (The Kennel Club); provision of expertise in canine behaviour and of programmes designed to manage greyhounds in early life in ways consistent with facilitating an easy behavioural transition to domestic life after retirement (Greyhound Trust), promotion of ownership of retired greyhounds (Greyhound Trust) and traceability (Battersea Dogs and Cats Home). This work is all funded.

***Appendix III p34 'Furthermore the need for greyhounds to be psychologically (adaptable to new environments and stressful situations) and physically resilient (breed for resilience rather than speed) suggests that the dog needs to adapt to the industry rather than changing the industry to ensure it is welfare compatible'.***

This is incorrect. GBGB's welfare strategy provides a comprehensive and holistic approach to optimising greyhound welfare, which incorporates both modern understanding of behavioural science and modern technologies whilst also paying very detailed attention to management.

In conclusion, the GBGB will look forward to discussing the contents of this response with the RAINE Committee later this month. All our Directors and Staff are committed to putting greyhound welfare at the heart of everything that we do and consider ourselves to be first, and foremost, greyhound welfarists.

Yours sincerely,

Jeremy Cooper  
GBGB Chair

Mark Bird  
GBGB Chief Executive