

The British Equine Veterinary Association
The Veterinary Schools Council
The Association of Racecourse Veterinary Surgeons
World Horse Welfare
c/o Mulberry House
Market Street
Fordham CB75LQ

12th February 2018

The Rt Hon Matt Hancock MP
Secretary of State for Digital, Culture, Media and Sport
Gambling & Lotteries Policy Team
Department for Digital, Culture, Media and Sport
100 Parliament Street
London
SW1A 2BQ

Dear Mr Hancock,

RE: Consultation on the use of a Legislative Reform Order to reform the administration of the Horserace Betting Levy

We write, in response to the above consultation, to express our concern that the proposals omit any obligation to invest in the racehorse and its health and thereby remove a necessary and important element of welfare protection for the animals at the heart of the sport.

This is a combined response to the consultation from the UK's equine veterinary profession. It has been prepared by the British Equine Veterinary Association, the body representing British equine veterinary practitioners, the Association of Racecourse Veterinary Surgeons, the body representing equine vets engaged on UK racecourses, and the Veterinary Schools Council, the body representing the UK's veterinary schools/primary research establishments. The response is co-signed by World Horse Welfare, the respected international organisation which engages with racehorse welfare.

"The advancement or encouragement of veterinary science or veterinary education" was a statutory obligation in the Betting, Gaming and Lotteries Act 1963. We support the current imperative to modernise the Levy but we are concerned that Government has not legislated for continuation of the existing statutory benefit to the Thoroughbred horse through investment in veterinary research and training.

British Horseracing has three distinct strands of veterinary expenditure:

1. **Independent Veterinary Care.** Vets engaged by individual owners, trainers, and racecourses for the treatment of individual animals.
2. **Ensuring Integrity.** The industry regulator, the BHA, employs a team of veterinary and welfare officers to supervise standards of horse-care on racedays and in training establishments, and to oversee aspects of horseracing integrity (e.g. anti-doping) .
3. **Veterinary Research & Training.** Investment in research relating to Thoroughbred health is currently administered by HBLB and supported by a Veterinary Advisory Committee. The fruits of this investment provide demonstrable health and welfare benefits to the racehorse and to the industry which the horse supports.

We urge Government to ensure that regulation and research/training remain as entirely distinct and separate strands of veterinary expenditure.

The restructuring of the industry offers an excellent opportunity to modernise the mechanisms underpinning Thoroughbred research funding and thereby add value to British Racing's investment. Efficiency and impact can be increased by adopting the model that the UK Government applies to the Research Councils in line with the Haldane principle. This model promotes transparency, agility and responsiveness to the strategic needs of industry stakeholders and facilitates collaboration nationally and internationally.

In addition to the general comments, above, our response will address questions 2, 5 and 6 in the Consultation document:

***Question 2:** Do you have any views regarding the expected benefits of the proposals as identified in Chapter 3 and 4 of this consultation document and addressed in the de minimis assessment*

We have no specific view on the issue of whether the levy should be calculated on actual or estimated gambling operator profit. However, we would point out that the decline in levy income, which has occurred over the last 10-15 years coupled with the current uncertainties over funding are already contributing to a significant loss of veterinary research capacity within the UK. We seek reassurance that the new system will continue or increase the level of investment in Thoroughbred health research and education. For the last 15 years the investment has been between 2 - 2.5% of the total levy income.

We note, in point 3.55 that Government is minded to include a requirement for the Racing Authority to consult with industry stakeholders on its strategy for disbursement of Levy funds. We urge Government to include a requirement to specifically consult with the equine veterinary industry, in particular the groups represented in this collective response.

We welcome the Transparency requirements (points 3.57-3.60) proposed by Government, and believe that a Thoroughbred Research Council, modelled on the UK research councils, is an ideal solution to this need.

Question 5. Do the proposals taken as a whole strike a fair balance between the public interest and any person adversely affected by it?

We note that the interests of the Thoroughbred horse are not highlighted in these proposals. We believe that the British public expects horseracing to invest in activities to reduce injury and disease in the horses at the heart of the sport and to continue to improve veterinary science for the benefit of Thoroughbred health.

Question 6. Do the proposals remove any necessary protection?

We are concerned that these proposals remove a necessary and important element of protection for the horse, namely the obligation to invest in its health through veterinary research and education. The British Public cares deeply about animal welfare and any real or perceived compromise to racehorse welfare has the potential to substantially reduce public support.

Yours sincerely,

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