



Department
for Environment
Food & Rural Affairs

Consultation on the initial findings of the Review of the Welfare of Racing Greyhounds Regulations 2010

Summary of responses

August 2016



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1. Overview

Introduction

This document provides a summary of responses to Defra's consultation exercise undertaken as part of Defra's review of the Welfare of Racing Greyhounds Regulations 2010. The consultation ran for 8 weeks from 6th November to 31st December 2015. The aim of this document is to provide a summary of the responses received. It does not offer a detailed opinion on the comments received.

Background

The Welfare of Racing Greyhounds Regulations 2010 (the 'Regulations') came into force on 6 April 2010 and have been in force now for over five years. The Government, in line with its commitment to review all new regulations after they have been in force for a period of time, is undertaking a review of their effectiveness.

The aim of the Regulations, as stated in the Explanatory Memorandum published alongside the Regulations, was to ensure that "all greyhound tracks in England are covered by the same minimum welfare standards and there will be improved traceability of greyhounds".

The Regulations therefore require all greyhound racing tracks in England to meet certain minimum welfare standards. These standards are either enforced by a local authority, via a licence from the local authority, or alternatively by a body which has secured UKAS accreditation in respect of the enforcement of these standards. All tracks must:

- have a veterinary surgeon present at all race meetings and trials; with each greyhound examined by the vet prior to racing or trialling and no greyhound being allowed to run if the vet deems it is unfit to race for any reason;
- ensure that the veterinary surgeon has suitable facilities;
- provide an adequate number of suitably ventilated kennels;
- only allow greyhounds which are microchipped and tattooed (with details on an appropriate national database) to race or trial at the track;
- keep records of all greyhounds who race or trial at the track; and
- keep records of any greyhounds injured at the track.

The Regulations do not cover: conditions at trainers' and breeders' kennels or during transportation, or the retirement or euthanasia of greyhounds. It was stated in the Explanatory Memorandum to the Regulations that the Government at the time was "satisfied that there is already welfare regulations in place that provide significant protection in these areas."

Review of the Regulations

The Government is committed to regularly reviewing the effectiveness of all regulations that impact on business. All new regulations introduced through secondary legislation must now contain statutory review provisions. Measures that include a statutory review provision must be formally reviewed within five years of the date the measure came into force, and then regularly on a five year cycle. The Welfare of Racing Greyhounds Regulations 2010 predate the requirement to include a statutory review provision. However, Defra still wish to review the Regulations to establish whether, and to what extent:

- the Regulations have achieved their original objectives;
- the objectives and scope of the Regulations are still valid; and
- regulation is still the best option for achieving those objectives.

Thus the Review is clearly defined and is not reviewing whether greyhound racing should be banned. Neither is it reviewing the performance of the Greyhound Board of Great Britain (GBGB), the main governing body of the sport, in relation to any of its activities that are not directly, or indirectly, covered by the Regulations. Nor is it reviewing the Greyhound Industry as a whole or the funding that underpins its existence.

Evidence collected

Prior to this consultation, Defra had already undertaken and commissioned research to gather evidence on the effectiveness of the Regulations and their impact on greyhound welfare. Evidence was collected, in the form of the experiences of relevant stakeholders from across the industry, from track operators and track vets, to re-homing organisations and welfare groups.

Evidence was collected via two strands of research. The first strand involved recruiting a social research company, GfK, to undertake independent qualitative and quantitative research. As part of this research, GfK interviewed, by telephone, 44 people from a variety of backgrounds but all who have some experience of the operation of the Regulations. This research explored participant's views and opinions on how effectively they felt the Regulations are currently working, particularly in relation to the required conditions. The research also explored wider greyhound welfare issues. This research was, by its very nature, investigatory in its approach but has still provided detailed feedback regarding the Regulations. GfK also sought, on a confidential basis, injury and euthanasia figures from tracks. No information from individual tracks was shared with Defra.

The second strand of the research entailed Defra undertaking an on-line survey of other interested stakeholders likely to have experience of the Regulations. Some 103 responses were received to this exercise. Results of both strands of research have been

collated into one report – which was the main reference document for this consultation – ‘Exploring Effectiveness of Racing Greyhounds Legislation (2010)’. The Report represents the initial findings of the review of the Regulations.

During the course of this Review, the Environment, Food and Rural Affairs Committee also undertook an inquiry into ‘Greyhound welfare’. One of the objectives of the Committee’s inquiry was to contribute to the Defra Review and their report will also be used as evidence in the review process.

Consultation of the initial findings and options for further action

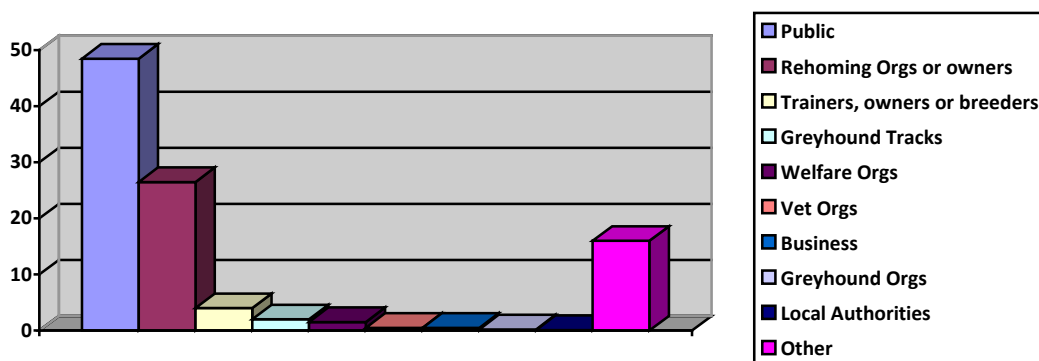
This consultation was an opportunity for all interested parties to scrutinise and comment on the initial findings of the Review so far, offering any other evidence either in support of the findings or by way of challenge to them. The consultation was also an opportunity for all interested parties to comment and, if needed, supply evidence on some of the possible options for further action.

Next steps

Defra will now analyse all the responses, together with the initial findings and the findings of the Environment, Food and Rural Affairs Committee’s report on greyhound welfare, to produce a final Review document. This document will set out how effective we believe the Regulations have been, whether they are still required, and, if so, where we consider there are areas where amendments need to be considered, plus any other proposals we may consider for further action.

2. Summary of statistics

Defra received 1224 written or online responses to the consultation, of which 593 (48.5%) were from members of the public with an interest in this topic, 324 (26.5%) from greyhound rehoming organisations or owners (past or present) of retired greyhounds, 52 (4%) from racing greyhound trainers, breeders or owners (past or present), 25 (2%) from operators or owners (past or present) of greyhound racing tracks – out of some 29 tracks operating in England at the time of the consultation, 20 (1.5%) from welfare organisations, 8 (0.5%) from vets or veterinary groups, 8 (0.5%) from business or industry, 3 (0.2%) from greyhound racing organisations and 1 (0.1%) from local authorities. 190 (16%) of respondents defined themselves as 'other' or did not provide a definition.



Sample size: 1,224

Defra received a number of responses that appear to have been submitted in response to several campaigns or posts initiated by organisations such as animal welfare or racing greyhound organisations. Defra also received a petition, signed by 242,241 supporters, calling for “Irish Greyhound Racing Welfare Regulations in line with the UK & improve UK welfare regulations”. A summary of the issues raised in these responses is provided later in this report.

3. Summary of Responses

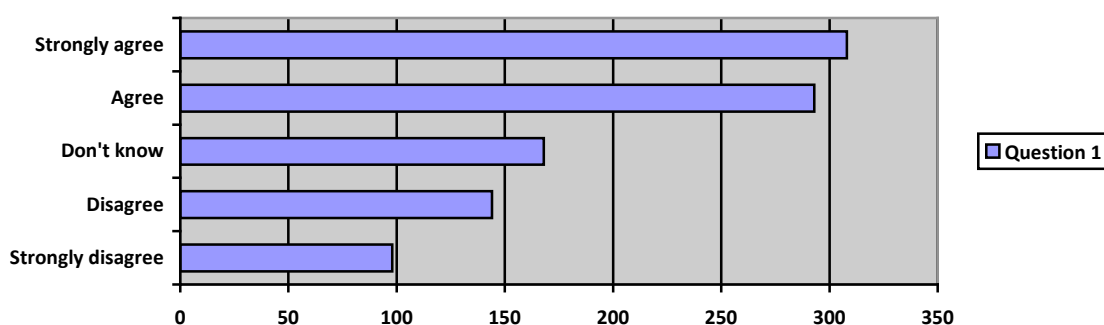
The responses received in relation to the specific questions raised in the consultation paper and in the citizen space survey are summarised below. This summary tries to reflect the general views offered but, inevitably, it is not possible to describe all the responses in detail.

a) Condition 1: Attendance of a veterinary surgeon

Responses to Question 1 - To what extent do you agree with the following statement: ‘veterinary attendance at all race meetings and trials with pre-running checks has, overall, had a positive impact on greyhound welfare’?

Summary: 59.5% of respondents responded positively to this statement, 24% responded negatively and 16.5% did not know. While the majority of respondents agreed veterinary presence has had a positive impact, there were some concerns about veterinary independence. Some respondents also felt unable to make a judgement as injury and euthanasia statistics were not published.

Of the 1011 responses that directly addressed this question: 308 (30.5%) strongly agreed with the statement with 293 (29%) agreeing with the statement. 144 (14%) disagreed with the statement with 98 (10%) strongly disagreeing with the statement. 168 (16.5%) did not know.



Strongly agree or agree

Of the 601 responses strongly agreeing or agreeing with the statement, 316 provided additional supporting comments. Across all the different groups that responded there were some common themes:

- The presence of a vet could be the difference between the life and death of a dog should it get injured, and should reduce suffering where a dog was injured.

Checking the dogs was also seen as a simple way of ensuring only healthy dogs race.

- It was clear or 'common sense' that the requirement to have a vet present at race meetings and trials, with pre-running checks, would contribute to an improvement in greyhound welfare.
- There was agreement with the initial findings that there has been a welfare improvement at independent ('flapping') tracks, where vets were previously not required, but less of an impact at GBGB tracks, where vets were required before the Regulations came into force.
- The requirement to have a vet present has added a degree of transparency and impartiality to the sport.

However, while agreeing that the presence of a vet had, overall, had a positive impact on greyhound welfare, common additional comments from those outside the sport included:

- Concerns about the need for the vet to be financially independent from the track to ensure that they are not put into difficult positions when decisions relating to whether or not racing can take place, or dogs raced, have to be made.
- Concerns about the consistency of checks, the time allotted for them to take place and, in some cases, the qualifications of the vets.

Strongly disagree or disagree

Of the 242 responses strongly disagreeing or disagreeing with statement, 200 provided additional supporting comments. These were mostly from those outside the industry. Common concerns included:

- Concerns about the need for the vet to be financially independent from the track (this was also a concern of some trainers, breeders or owners of racing greyhounds).
- Concerns about insufficient time for a vet to fully examine a greyhound prior to allowing the dog to be passed fit to run (this was also a concern of some trainers, breeders or owners of racing greyhounds).
- Concerns about greyhound welfare away from the track, including breeding and trainers kennels, where greyhounds are kept for longer periods than just at tracks, and where racing injuries, or other conditions – which would not necessarily prevent the dog running (fleas, worms, dental problems, etc), are not being treated.
- Concerns about greyhounds being euthanized at tracks where it is considered to be too expensive to provide treatment.

- Concerns about greyhounds still being injured during races, including concerns about poorly maintained tracks and the frequency of the dogs being raced.
- The lack of injury and euthanasia statistics being published meaning making an assessment of the impact impossible.
- Concerns that vet attendance and veterinary checks do not test if a dog has been given performance altering drugs, or has been interfered with in some other way to affect its performance.

Do not know

Of the 168 who responded 'did not know' to the statement, 74 provided additional supporting comments. These were mostly from those outside the industry. Common responses included:

- Without published injury or euthanasia data, or without knowing the levels of treatment/euthanasia pre regulations and post regulations, it was impossible to assess the impact of the introduction of a veterinary presence on welfare.
- While veterinary attendance should have had a positive impact, there were concerns about the vet being financially dependent of the track or the industry, potentially presenting a conflict of interest.
- Concerns about greyhound welfare away from the track (e.g trainers' and breeders' kennels).
- Concerns about the quality and time allowed for pre-running checks, and injuries still occurring after checks – due to poor track conditions. And the suggestion that vets only seeming to be in attendance to euthanize injured greyhounds.

Responses to Question 2 - Do you agree or disagree that this condition should remain a legal requirement on all greyhound tracks in England?

Summary: 99% of respondents agreed that this condition should remain a legal requirement, 1% of respondents disagreed. The majority agreed that vets were needed to ensure welfare and treat injuries, as well as provide some external scrutiny of the sport.

Of the 1012 responses that directly addressed this question: 1001 (99%) agreed with the statement with 11 (1%) disagreeing with the statement.

Agree

Of the 1001 responses agreeing that veterinary presence at tracks should remain a legal requirement, 493 provided additional supporting comments. Across all the different groups that responded there were two common themes:

- The vet was needed to treat injuries and help ensure the welfare of racing greyhounds
- The vet provided a level of external scrutiny of the sport.

However, as in Question 1, there were some concerns, from those outside the sport, that vets needed to be independent from the tracks.

Disagree

Of the 11 responses disagreeing that veterinary presence at tracks should remain a legal requirement, 7 provided additional supporting comments. The common theme here, from those outside the sport, was a preference for greyhound racing to be banned instead.

Responses to Question 3 - Do you agree or disagree with the suggestion that the Regulations could be amended to better define the content of the veterinary inspection prior to any race, trial or sales trial?

Summary: 95% of respondents agreed that the Regulations should be amended to better define veterinary inspection with 5% of respondents disagreeing. The view of the majority of vets agreeing that the Regulations should be amended suggested that a hands-on examination of each greyhound was needed.

Of the 988 responses that directly addressed this question: 936 (95%) agreed with the suggestion with 52 (5%) disagreeing with the suggestion.

Agree

Of the 936 responses agreeing that the Regulations should be amended to better define veterinary inspection, 490 provided additional supporting comments.

Of the vets that agreed the Regulations should be amended to better define veterinary inspection there was common agreement that the description should include a hands-on examination, rather than an inspection. Some suggested the examination should also include a 5 metre trot-up and return. A full clinical examination was seen as unnecessary. Some trainers also suggested that hands on examinations were required.

Other common suggestions expressed by groups outside the sport were:

- The need for checks on the greyhound's health to be included e.g. checks on teeth, feet, nails, weight (before and after running), ears, skin condition, etc
- Drug testing to be included in the veterinary inspection
- Post racing checks to be undertaken.

There was also a common concern expressed by groups outside the sport, as well as some trainers, breeder or owners, about the independence of vets. Some trainers,

breeders or owners also suggested drug testing be included as well, but only in relation to sales trials.

Disagree

Of the 52 responses disagreeing that the Regulations should be amended to better define veterinary inspection, 43 provided additional supporting comments.

Common themes expressed by tracks and some members of the public was that vets were qualified to ensure the welfare of animals in their care and therefore track vets were qualified to inspect greyhounds before they raced. One veterinary association also suggested that an overly prescriptive approach in the Regulations would not improve welfare.

b) Condition 2: Facilities for the attending veterinary surgeon

Responses to Question 4: Do you agree or disagree with the initial findings that the provision of veterinary facilities has, overall, had a positive impact on greyhound welfare?

Summary: 78% of respondents agreed with the initial findings of the review that the provision of veterinary facilities has had a positive impact on greyhound welfare, with 22% disagreeing. Many agreed with the initial findings of the review that the provision of veterinary facilities has had a positive impact, but this impact was most pronounced at independent tracks.

Of the 976 responses that directly addressed this question: 758 (78%) agreed that the provision of veterinary facilities has had a positive impact on greyhound welfare with 218 (22%) disagreeing.

Agree

Of the 758 responses agreeing that that the provision of veterinary facilities has had a positive impact on greyhound welfare, 320 provided additional supporting comments.

A common theme across sectors was that, as identified in the initial findings of the review, this requirement appears to have had more of an impact at independent tracks, rather than at GBGB tracks, where most of the facilities were required before the Regulations were introduced. Other common themes across most of the sectors were that the provision of veterinary facilities allows for better prompt treatment of any injured greyhounds as well as more general agreement with the initial findings of the review for this area.

Disagree

Of the 218 responses disagreeing that the provision of veterinary facilities has had a positive impact on greyhound welfare, 144 provided additional supporting comments.

Common concerns expressed by groups outside the sport disagreeing that the provision of veterinary facilities has had a positive impact on greyhound welfare included:

- Concerns about greyhounds still being injured during races.
- The lack of published injury and euthanasia statistics meaning an assessment of the impact was impossible.
- Concerns about greyhound welfare away from the track

Responses to Question 5: In your opinion does the description of the facilities to be provided need to be amended in anyway?

Summary: 43.5% of respondents said yes, the description of the veterinary facilities provided needed to be amended, 8.5% said no, while 48% said don't know. The most commonly agreed suggestion was that veterinary facilities should include CCTV to allow the vet to monitor races and trials from the vet's room.

Of the 984 responses that directly addressed this question: 428 (43.5%) said yes to the statement, 85 (8.5%) said no, with 471 (48%) responding don't know.

Of the 428 responses saying yes, the description of veterinary facilities should be amended, 291 provided suggestions for amending the description.

A common response from veterinarians and welfare groups, as well as others from outside the industry was that the Regulations should be amended to require CCTV in the vet's room (with replay facilities) to allow a Video/TV feed of all races and trials. This was seen as vital when the vet was busy with other duties and could not leave the room to watch each race or trial. Some trainers, breeders and owners of racing greyhounds also called for this change.

Another common response from welfare groups (but not vets) and others from outside the industry suggested that the description should be amended to include the requirement for a lockable refrigerator specifically for the storage and safety of prescription only medicines (POMs).

A third common response from just those outside the industry was that there should be a requirement for a second vet to be present.

A common response mainly from trainers, breeders and owners of racing greyhounds was the suggestion that the Regulations should be amended to require the provision of x-ray facilities.

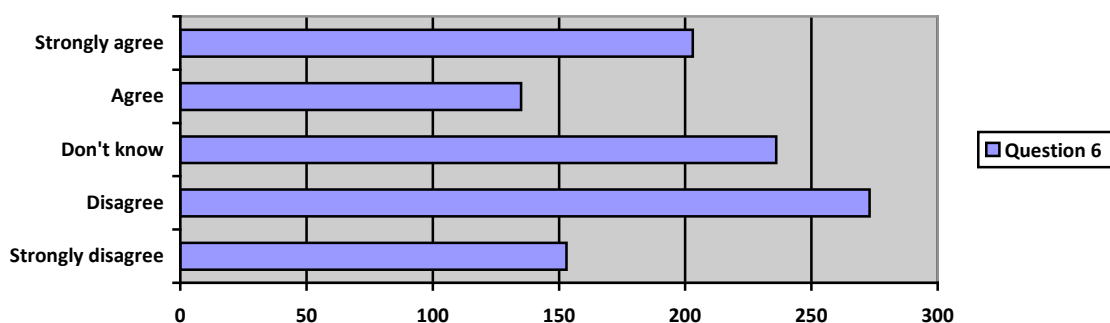
Of the 471 responses saying don't know, 52 provided additional supporting comments. The most common themes here, from those outside the industry, were that Defra should consult independent veterinary groups on this matter or that the respondent themselves was not aware of what the current requirements were¹.

Veterinary independence

Responses to Question 6: To what extent do you agree with the following statement: 'the track vet has sufficient authority to ensure any ruling they make, with regard to whether a greyhound is fit to run, is carried out'?

Summary: 34% of respondents responded positively to this statement, 42.5% responded negatively and 23.5% did not know. The main concern expressed, even by those agreeing vets had sufficient authority, was over the independence of track vets.

Of the 1000 responses that directly addressed this question: 203 (20.5%) strongly agreed with the statement with 135 (13.5%) agreeing with the statement. 273 (27.5%) disagreed with the statement with 153 (15%) strongly disagreeing with the statement. 236 (23.5%) did not know.



Strongly agree or agree

Of the 338 responses strongly agreeing or agreeing with the statement, 158 provided additional supporting comments.

Most vets responding to the survey agreed they had sufficient authority to ensure any rulings they made were carried out. In common with the initial findings of the review, the vets that responded to the survey felt that in most cases the track vet did have the final say. However, there were concerns by some vets about veterinary independence. It was suggested that having vets financially independent from tracks would be preferable. However, it was also suggested by one veterinary association that introducing a robust

¹ The Defra on-line survey did provide an extract from the 2012 Regulations setting out the requirements.

arbitration procedure, to settle any disputes between tracks and track vets, could help uphold veterinary independence.

Across other groups, including those outside the industry as well as some trainers, breeders and owners, whilst recognising that vets were trained and qualified for the role and undertook the RCVS oath to act in the best interests of the animals, there were still concerns about track vets not being financially independent of the track potentially presented a conflict of interest.

Strongly disagree or disagree

Of the 426 responses strongly disagreeing or disagreeing with statement, 321 provided additional supporting comments. These were mostly from those outside the industry. Common themes included:

- Concerns about the need for the vet to be financially independent from the track (this was also a concern of some trainers, breeders or owners of racing greyhounds).
- Concerns about vets being pressurised by trainers or owners to run dogs that were unfit, or to euthanize injured dogs on economic grounds.

Do not know

Of the 236 who responded 'did not know' to the statement, 91 provided additional supporting comments. Nearly all of these were from those outside the industry. Common themes included:

- Again, concerns about the financial independence of track vets.
- A lack of transparency in the sport meaning making such a judgment was difficult.

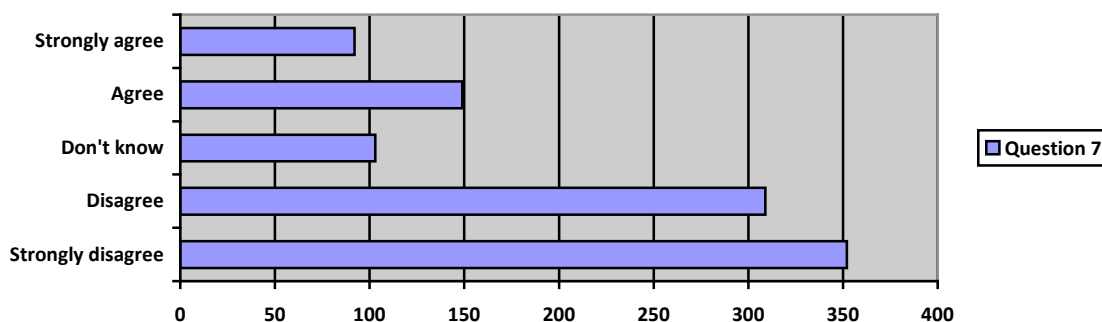
Veterinary expertise and knowledge

Responses to Question 7: To what extent do you agree with the following statement: 'the track vet does not need to obtain specialist racing greyhound training in order for them to operate as a track vet for the purpose of the Regulations'?

Summary: 24% of respondents responded positively to this statement, 66% responded negatively and 10% did not know. The main view expressed by those responding negatively to the statement was that racing greyhounds were different from other dogs, and the situation in which they were used, and the injuries and ailments sustained, meant the specialist training was needed to operate as an effective track vet.

Of the 1005 responses that directly addressed this question: 92 (9%) strongly agreed with the statement with 149 (15%) agreeing with the statement. 309 (31%) disagreed with the

statement with 352 (35%) strongly disagreeing with the statement. 103 (10%) did not know.



Strongly agree or agree

Of the 241 responses strongly agreeing or agreeing with the statement, 104 provided additional supporting comments.

A common theme amongst those outside the sport as well as some trainers, owners and breeders, as well as the tracks themselves was that vets registered with the RCVS are competent to treat and administer first aid to racing greyhounds without any additional specialist training. And that vets, having to abide by the RCVS Code of Professional Conduct, have to keep their skills and knowledge up to date, by means of continuing professional development. There was a concern from members of the public, that requiring further specialist training may limit the number of available vets. Amongst these respondents, the presence of a vet was seen as more important than the need for specialist training.

The GBGB, in their response, stated that they provided annual training for all licensed and prospective track vets, in addition to providing detailed information in their 'The Duties of Track Vet' document. GBGB also indicated that they are considering making attendance at an annual Track Vet Training Conference a condition of a license for a GBGB track vet.

Strongly disagree or disagree

Of the 661 responses strongly disagreeing or disagreeing with statement, 432 provided additional supporting comments.

A common view amongst veterinary groups that disagreed with the statement was that greyhounds have significant differences to the general dog population to mean that specialist knowledge of or an interest in the breed and sport is beneficial both to the dog and the owners/trainers. Injuries and ailments seen in these animals would not be seen in general practice. This was also the predominant view amongst those outside the industry as well as a number of trainers, breeders and owners of racing greyhounds.

The BVA/BSAVA in their response suggested that, while any veterinary surgeon should be capable of assessing the fitness of a dog to compete "we recognise that a knowledge of

injuries commonly found in racing greyhounds would enhance the service a veterinary surgeon may provide. Whilst we acknowledge that regulation may not be essential here, the government and the greyhound racing industry should encourage vets working at greyhound tracks to enhance their knowledge of the physiology of the greyhound via Continuing Professional Development etc”.

Do not know

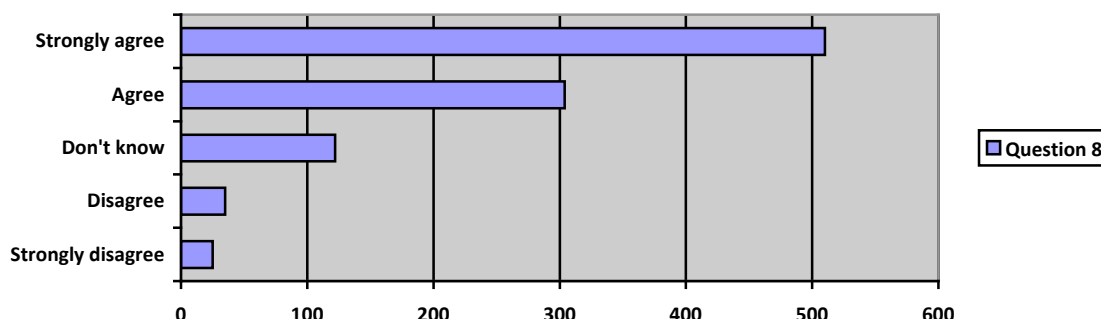
Of the 103 who responded ‘did not know’ to the statement, 36 provided additional supporting comments. Most of these comments came from those outside the industry. Common themes were concerns that requiring further specialist training may limit the number of available vets. There was also a concern that vets trained in greyhound racing matters may become too close to the industry.

c) Condition 3: Kennels

Responses to Question 8: To what extent do you agree with the following statement: ‘it is important for welfare purposes that it remains a legal requirement for tracks to provide kennelling for dogs that race or trial at the track’?

Summary: 81.5% of respondents responded positively to this statement, 6.5% responded negatively and 12% did not know. The main views expressed were that track kennels were needed to provide somewhere for dogs to rest after a journey or a race, and that kennels were preferable to keeping a greyhound in another environment (such as a car or van) that might not be suitable.

Of the 996 responses that directly addressed this question: 510 (51%) strongly agreed with the statement with 304 (30.5%) agreeing with the statement. 35 (3.5%) disagreed with the statement with 25 (3%) strongly disagreeing with the statement. 122 (12%) did not know.



Strongly agree or agree

Of the 814 responses strongly agreeing or agreeing with the statement, 428 provided additional supporting comments. Across all the different groups that responded there were some common themes:

- Track kennelling was needed to provide a safe place for greyhounds to be kept during a race meeting (e.g. not in a van or a car).
- Kennelling provides a quiet place for dogs to rest or cool down before or after a journey or race.

Outside of the industry, it was also felt that the kennels provided another area where the welfare of the dogs could be monitored.

However, amongst some members of the public, those who have rehomed retired greyhounds and trainers, breeders and owners of racing greyhounds, there was some common concerns expressed about the length of time dogs were required to be kennelled while at the tracks. A common further concern by vets was ensuring there was sufficient time between uses to ensure each kennel was clean and dry before being used again.

Strongly disagree or disagree

Of the 60 responses strongly disagreeing or disagreeing with statement, 41 provided additional supporting comments.

Amongst members of the public as well as those who have rehomed retired greyhounds, there was a concern about the necessity of kennelling dogs in small spaces for lengthy periods of times. Some also believed that kennelling was not required for welfare reasons (kennelling being needed primarily to ensure the integrity of a race). Amongst some trainers, breeders and owners of racing greyhounds there was a concern about the length of time greyhounds were required to be kennelled at the track.

Do not know

Of the 122 who responded 'do not know' to the statement, 54 provided additional supporting comments.

Amongst members of the public as well as those who have rehomed retired greyhounds, common issues cited here included:

- A lack of transparency meaning they felt unable to answer this question (or they felt they were unable to answer due to a lack of knowledge of track kennels).
- It was dependent on the quality of the track kennels being provided.

Responses to Question 9: Do you agree or disagree with the statement: ‘the requirement for tracks to provide kennels for at least 20% of the total number of greyhounds taking part in a race or trials is still appropriate’?

Summary: 32% of respondents agreed with the statement ‘the requirement for tracks to provide kennels for at least 20% of the total number of greyhounds taking part in a race or trials is still appropriate’ with 68% of respondents disagreeing. The most common suggestion was that kennelling should be provided for all dogs taking part in a race or trial, although no evidence was submitted that all the kennels would be used.

Of the 928 responses that directly addressed this question: 297 (32%) agreed with the statement with 631 (68%) disagreeing with the statement.

Agree

Of the 297 responses agreeing that the requirement for tracks to provide kennels for at least 20% of the total number of greyhounds taking part in a race or trials was still appropriate, 87 provided additional supporting comments.

Amongst members of the public as well as those who have rehomed retired greyhounds, a common theme was that it was an acceptable minimum provision, as long as the kennels provided were clean and secure. A common theme from respondents from within the industry was a recognition that the operation of independent tracks was different to tracks operating within the industry’s Rules of Racing, and therefore kennelling for all dogs was not necessary.

Disagree

Of the 631 responses disagreeing that the requirement for tracks to provide kennels for at least 20% of the total number of greyhounds taking part in a race or trials was still appropriate, 441 provided additional supporting comments.

A common response from all sectors was that there should be kennels for all dogs taking part in a race or trial. Another common response was that the figure should be higher than 20%, but no specific figure was provided. A common reason for the 100% or ‘higher than 20%’ figure was that kennels were needed to avoid greyhounds being kept in a vehicle at the track. However, no evidence was submitted that this was a common occurrence at independent greyhound tracks (which would be the only tracks impacted by any change to this requirement). Also, there was no evidence provided that the number of kennels being provided at independent tracks was insufficient for the number of dogs using them.

There was a common suggestion from vets that the 20% figures were included as an interim measure in the 2010 Regulations to allow independent tracks time to build kennels (and that, after 5 years, they should now be expected to provide kennels for all dogs).

This is incorrect. Given the Regulations do not require all dogs to be kennelled prior to racing, a requirement to provide kennels for all dogs that race was never considered as a long term objective.

Responses to Question 10: In your opinion do the requirements for adequate kennelling need amending to add clarity?

Summary: 80% of respondents said yes, the requirement for adequate kennelling needed amending to add clarity, 6% said no, while 14% said don't know. The most commonly agreed suggestion was that the provision of water should be included in the requirements for adequate track kennelling.

Of the 989 responses that directly addressed this question: 789 (80%) said yes to the statement, 59 (6%) said no, with 141 (14%) responding don't know.

Of the 789 responses saying yes, the requirements for adequate kennelling should be amended, 434 provided suggestions for amending the description.

A common response from veterinarians and welfare groups, as well as trainers, breeders and owners of racing greyhounds and respondents from outside the industry was that the Regulations should be amended to require the provision of water in track kennels.

Further common responses from vets included the requirement for there to be some sort of climate control or air-conditioning in track kennels, as well as ensuring that all track kennels were cleaned and fully dried between uses. One veterinarian suggested that they 'would like it to become a legal requirement that air temperature and relative humidity should be recorded at least once during the course of each race meeting or trial session'.

Trainers, breeders and owners of racing greyhounds also commonly cited the need for climate control or air conditioning in the track kennels. This group also commonly cited the need for maximum kennelling times for dogs to be kept in track kennels.

Respondents from outside the industry also commonly cited the need for maximum kennelling times to be added to the requirements. A common response from this group was also the required kennel sizes should be larger and that there needed to be a clearly defined acceptable temperature range.

Of the 141 responses saying don't know, 14 provided additional supporting comments. The two most common themes here, from those outside the industry, were a lack of transparency in the sport meaning making such a judgment was difficult or that the respondent themselves was not aware of what the current requirements were².

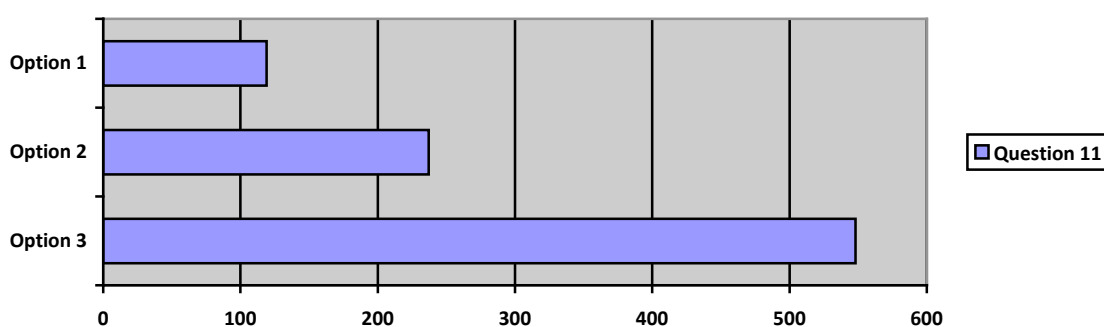
² The Defra on-line survey did provide an extract from the 2012 Regulations setting out the requirements for track kennels.

Kennelling outside of the tracks

Responses to Question 11: Which of three options highlighted in this consultation for addressing welfare standards at trainer's kennels do you believe will best secure acceptable welfare standards?

Summary: 13% of respondents supported Option 1 (Animal Welfare Act offences), 26% of respondents supported Option 2 (GBGB UKAS accreditation) and 61% of respondents supported Option 3 (Regulation). However, no analyses of the likely costs and benefits of any of the options were submitted.

Of the 904 responses that directly addressed this question: 119 (13%) said Option 1, 237 (26%) said Option 2 and 548 (61%) said Option 3.



Option 1 – Animal Welfare Act 2006 offences

Of the 119 respondents supporting Option 1, 49 provided additional supporting comments

The most common theme for those supporting Option 1 was that the current offences, powers and penalties in the Animal Welfare Act 2006 should be sufficient to tackle conditions at trainers' kennels. This view was common amongst those outside the industry who supported this option, as well as some trainers, owner and breeders of racing greyhounds, as well as some welfare groups. For all the above groups, a common theme why Option 1 was seen as superior to Options 2 and 3 was that this option provided the more immediate solution (the legislation already being in place) and that enforcement of this option was more independent, with some respondents expressing concerns about the enforcement of conditions at trainers' kennels by the main industry body, the Greyhound Board of Great Britain.

No additional supporting evidence, including an analysis of the likely costs and benefits of this option, was submitted by those supporting this option.

Option 2 – UKAS accreditation of GBGB trainers' licensing scheme

Of the 237 respondents supporting Option 2, 98 provided additional supporting comments

The most common theme from all those supporting Option 2, both from within and outside of the industry, was that it made sense to involve industry and other experts together in setting independent, transparent standards for trainers' kennels. For members of the public and those rehoming retired greyhounds, a further common view expressed was that Option 1 was already in place and on its own clearly wasn't currently enough. Higher, more specific standards were needed. Option 2 provided higher standards than Option 1 but it was perceived to be a less expensive, more practicable solution than Option 3.

Amongst responses from the industry, including trainers, breeders and owners of racing greyhounds and greyhound tracks, Option 2 was seen as preferable as it would entail enforcement of independently agreed standards at GBGB trainers' kennels by the GBGB, who themselves would be independently assessed to do so by UKAS.

No additional supporting evidence, including an analysis of the likely costs and benefits of this option, was submitted by those supporting this option.

Option 3 – Regulation (with exemption for UKAS accredited bodies)

Of the 548 respondents supporting Option 3, 285 provided additional supporting comments

The most common theme from those supporting Option 3, mainly from those outside of the sport, but also expressed by vets and some trainers, owners or breeders of racing greyhounds was that the more regulatory approach offered by this option was preferred, as it ensured regulation was more independent and based less on a self-regulatory model. For members of the public and those rehoming retired greyhounds, a further common view expressed was that Option 1 was already in place and on its own clearly wasn't currently enough. Further, Option 2 would only ensure standards were monitored at GBGB licensed trainers' kennels, with conditions at kennels of trainers operating solely at independent tracks not being sufficiently monitored. No responses offered any evidence as to the actual number of such kennels, or what the typical standards at these kennels were, but a number of responses did suggest that many greyhounds racing on independent tracks are in fact registered GBGB greyhounds and therefore trainers' kennels would be covered.

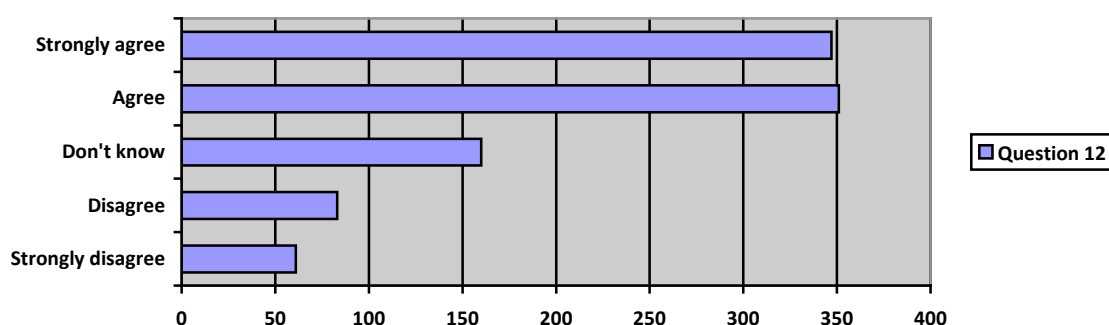
Some respondents to this question submitted reports by the Dogs Trust and the League Against Cruel Sports that highlighted conditions at some trainers' kennels. However, no other additional supporting evidence, including an analysis of the likely costs and benefits of this option, was submitted by those supporting this option.

d) Condition 4: Identification of greyhounds taking part in races or trials

Responses to Question 12: To what extent do you agree with the statement: ‘the requirement that all greyhounds entering a race or trial must be permanently identified appears to have had a positive impact on greyhound welfare’?

Summary: 70% of respondents responded positively to this statement, 14% responded negatively and 16% did not know. The main view expressed was that the requirement to permanently identify greyhounds had improved the traceability of the dogs. However, views were more divided as to whether the requirement to tattoo greyhounds, alongside the requirement to microchip them, should continue.

Of the 1002 responses that directly addressed this question: 347 (35%) strongly agreed with the statement with 351 (35%) agreeing with the statement. 83 (8%) disagreed with the statement with 61 (6%) strongly disagreeing with the statement. 160 (16%) did not know.



Strongly agree or agree

Of the 698 responses strongly agreeing or agreeing with the statement, 294 provided additional supporting comments.

A common theme amongst those outside the sport as well as some trainers, owners and breeders, was that tattooing and microchipping in tandem had improved traceability. However, there was also a common view expressed by those outside the sport that, while microchipping had worked, the requirement to tattoo dogs as well should end. Other common views expressed by this group were that the requirement to permanently identify dogs had improved traceability, or had led to improved welfare through greater accountability of the owners.

A common view from welfare groups was that microchipping had had a beneficial impact – with one welfare group commenting that ‘microchipping appears to have had a huge and beneficial effect in identifying all dogs and accept that this will be the case in the racing’.

There was also a common view that the benefits of microchipping were greater than the benefits of tattooing.

A common response from within the industry was that the industry themselves had introduced microchipping in advance of the Regulations coming into force, as it believed it would positively impact on welfare.

Strongly disagree or disagree

Of the 144 responses strongly disagreeing or disagreeing with statement, 102 provided additional supporting comments.

Responses here were mainly from those outside the industry. Common issues cited were:

- Microchips were easily swapped between dogs (many responses attributed this to a League Against Cruel Sports report which filmed a conversation with a greyhound trainer claiming that microchips were being easily and routinely swapped).
- The requirement to permanently identify greyhounds had led to greyhounds being harmed (by having the identification removed).
- The requirement to permanently identify greyhounds hasn't prevented greyhound from continuing to be unaccounted for every year.
- Microchipping was seen as an acceptable method of permanent identification but tattooing was not.

Do not know

Of the 160 who responded 'did not know' to the statement, 68 provided additional supporting comments.

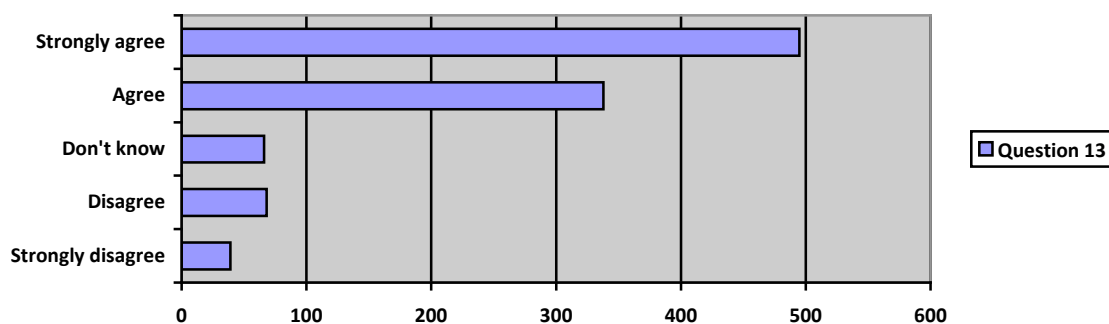
Again, responses here were mainly from outside the industry. Common issues cited were:

- Microchips were easily swapped between dogs (again, many responses attributed this to the League Against Cruel Sports report mentioned above).
- A dislike of tattooing as a method of permanent identification.
- A lack of transparency by the industry meaning they felt unable to answer.

Responses to Question 13: From 6 April 2016, all dogs in England will be required to be microchipped from 8 weeks of age, with a legal requirement for the details of any new keeper of a dog to be updated on an acceptable microchip database. To what extent do you agree with the statement: ‘the requirement for all dogs to be microchipped from 8 weeks of age will help further improve the traceability of greyhounds, including any greyhound that has left the sport’?

Summary: 82.5% of respondents responded positively to this statement, 11% responded negatively and 6.5% did not know. The most common view expressed was that the new requirement for all dogs to be microchipped from 8 weeks of age (with the keeper’s details updated) should improve the traceability of greyhounds before and after their racing lives.

Of the 1006 responses that directly addressed this question: 495 (49%) strongly agreed with the statement with 338 (33.5%) agreeing with the statement. 68 (7%) disagreed with the statement with 39 (4%) strongly disagreeing with the statement. 66 (6.5%) did not know.



Strongly agree or agree

Of the 833 responses strongly agreeing or agreeing with the statement, 302 provided additional supporting comments.

A common response across most groups was that the requirement to microchip all dogs from April 20016 will help improve the traceability of greyhounds outside of the racing environment, that is before and after a greyhound’s racing career. Further common responses from those outside the sport included that any improvement in traceability will be of benefit and the requirement should help improve the chance of holding owners of greyhounds to account should they harm or abandon a greyhound.

Strongly disagree or disagree

Of the 107 responses strongly disagreeing or disagreeing with statement, 96 provided additional supporting comments.

Responses here were mainly from those outside the industry. Common issues cited were:

- Microchips were easily swapped between dogs (again many responses attributed this to a League Against Cruel Sports report).
- Microchips can be removed from a greyhound.
- The new requirement will not be sufficiently policed or enforced, and there is no compulsory scanning.

Do not know

Of the 66 who responded 'did not know' to the statement, 43 provided additional supporting comments.

Again, responses here were mainly from those outside the industry. Common issues cited were that microchips can be removed from a greyhound or that the new requirement will not be sufficiently policed or enforced.

Responses to Question 14: Given the Microchipping of Dogs (England) Regulations 2015 require microchips and microchip databases to meet specific standards, do you think the 2010 Greyhound Regulations still need to detail acceptable microchip and microchip database standards?

Summary: 76% of respondents said yes, the 2010 Greyhound Regulations still need to detail acceptable microchip and microchip database standards, 8% said no, while 16% said don't know. The most commonly agreed suggestion was that the Greyhound Regulations should be amended to be compatible with the 2015 Regulations.

Of the 988 responses that directly addressed this question: 752 (76%) said yes to the statement, 80 (8%) said no, with 156 (16%) responding don't know.

Of the 752 responses saying yes, the the 2010 Greyhound Regulations still need to detail acceptable microchip and microchip database standards, 236 provided additional supporting comments.

The most common response from those outside the industry was that the Greyhound Regulations should be amended to be compatible with the 2015 Regulations. Other common responses amongst this group included: the more standards that were in place, the better it would be, and that racing greyhounds required their own specific microchip and database standards.

Of the 80 responses saying no, 52 provided additional supporting comments.

Across all groups a common response was that the microchipping requirements should be the same for all dogs. Many of these responses suggested that the Greyhound Regulations should be amended to include a cross-reference to the 2015 Regulations, rather than have separate standards. Another common response across all groups was that the standards in the 2015 Regulations should be sufficient. Responses from the industry highlighted that having duplicate standards would be overly bureaucratic.

Of the 156 responses saying don't know, 15 provided additional supporting comments. Beyond those stating they did not understand the detail of the question, there were no common responses from those responding don't know.

Responses to Question 15: Do you think it should remain a legal requirement, for welfare purposes, for all racing greyhounds to be tattooed as well as microchipped?

Summary: 43.5% of respondents said yes, it should remain a legal requirement for racing greyhounds to be tattooed as well as microchipped, 38.5% said no it should no longer be a legal requirement, while 18% said don't know. The most commonly agreed suggestions why tattooing should remain a legal requirement were that the tattooing database holds more information than microchip databases, and having a second form of identification was seen as a more secure way of identifying greyhounds. The most commonly agreed suggestions as to why tattooing should be removed as a legal requirement was that it was a painful procedure and the microchipping alone was a sufficient form of identification.

Of the 996 responses that directly addressed this question: 435 (43.5%) said yes to the statement, 383 (38.5%) said no, with 178 (18%) responding don't know.

Of the 435 responses saying yes, it should remain a legal requirement for racing greyhounds to be tattooed as well as microchipped, 237 provided additional supporting comments.

A common response from amongst those outside the sport as well as trainers, owners and breeders, was that tattooing was still required as the tattoo database contained more detail about each greyhound than was required by microchip databases. A further common view from members of the public, those rehoming retired greyhounds and some welfare groups was that microchips alone can be removed or swapped. A common view of those rehoming retired greyhounds and trainers, breeders and owners of retired greyhounds was that tattoos were more visible and allowed dogs to be identified without need of a scanner.

A common response from both the industry and those outside the sport was that having two methods of identification was seen as more secure way of identifying greyhounds.

By their own admission veterinary views on this matter were divided. One veterinary body suggested that while it was a painful procedure, it should be left as an interim measure (for a three further years) while an 'assessment can be made of the incidence of loss and migration of microchips inserted when pups are eight weeks old or younger.'

Of the 383 responses saying no, it should no longer be a legal requirement to tattoo racing greyhounds, 199 provided additional supporting comments.

A common response from amongst those outside the sport as well as trainers, owners and breeders and some vets, was that tattooing is unnecessary and the procedure itself is painful. Another common response from this group was that microchipping on its own was

a sufficient form of identification. A further common response from those outside the sport was that tattooing encourages ears to be cut off when a greyhound leaves the sport (to avoid it being traced back to its owner). Tattooing was also viewed by some within the industry as an outdated practice.

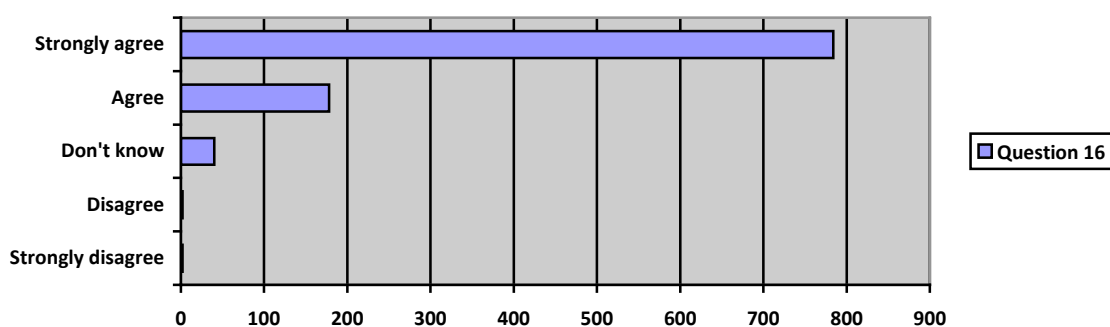
Of the 178 responses saying don't know, 51 provided additional supporting comments. The main common response, mainly from members of the public, was that they did not know enough about tattooing (either the procedure or the benefits) to enable them to answer this question.

e) Condition 5: Record of greyhounds taking part in races or trials

Responses to Question 16: To what extent do you agree with the statement 'it is important for welfare purposes for it to remain a legal requirement for tracks to keep records of dogs that race or trial at the track

Summary: 95.6% of respondents responded positively to this statement, 0.4% responded negatively and 4% did not know. The main views expressed were that these records should help ensure that no greyhound was run too frequently, and that the records should generally help improve the traceability of greyhounds.

Of the 1006 responses that directly addressed this question: 784 (78%) strongly agreed with the statement with 178 (17.6%) agreeing with the statement. 2 (0.2%) disagreed with the statement with 2 (0.2%) strongly disagreeing with the statement. 40 (4%) did not know.



Strongly agree or agree

Of the 962 responses strongly agreeing or agreeing with the statement, 433 provided additional supporting comments.

Common responses from amongst those outside the sport as well as trainers, owners and breeders included:

- Records of dogs raced or trialled at the track should help ensure a dog is not run too frequently at a track.
- These records should help in tracing greyhounds back to owners and trainers, and generally help improve the traceability of greyhounds.
- The records should help tackle the issue of dogs that are unaccounted for when they leave racing.

A further common response from some veterinary groups was that the records were needed as they could be used in conjunction with the required injury records to help improve welfare.

Strongly disagree or disagree

Of the 4 responses strongly disagreeing or disagreeing with statement, 2 provided additional supporting comments. Both responses, from outside the sport, suggested that the information was not being used so it did not contribute towards welfare.

Do not know

Of the 40 who responded 'did not know' to the statement, 8 provided additional supporting comments. Amongst members of the public as well as those who have rehomed retired greyhounds, the most common issue cited here was that a lack of transparency by the sport meant they felt unable to answer this question.

f) Condition 6: Injury records in relation to races, trials, or sales trials

Responses to Question 17: Do you agree or disagree with the statement 'it is important for welfare purposes for it to remain a legal requirement for tracks to keep records of dogs injured during a race, trial or sales trial'?

Summary: 99% of respondents agreed with the statement 'it is important for welfare purposes for it to remain a legal requirement for tracks to keep records of dogs injured during a race, trial or sales trial' with 1% of respondents disagreeing. The most common response was that injury records should remain a legal requirement but that they should be publically available and monitored (with action taken where necessary).

Of the 1002 responses that directly addressed this question: 995 (99%) agreed with the statement, with 7 (1%) disagreeing.

Agree

Of the 995 responses agreeing that the requirement for tracks to keep records of dogs injured during a race, trial or sales trial should remain, 518 provided additional supporting comments.

Common responses from amongst those outside the sport as well as trainers, owners and breeders included:

- Injury records were needed to help reduce racing injuries and improve welfare; but
- injury records should be made publically available; and
- Injury records should be proactively monitored and action taken where any trends were identified.

Common responses from within the industry also recognised that the keeping of injury records was important to help reduce injuries. A common response from track operators was that injury records allow for improvements in welfare by allowing tracks to share anonymised comparative data so that operators can easily see relative differences to help improve track structure and maintenance to minimise greyhound injuries.

Disagree

Of the 7 responses disagreeing that the requirement for tracks to keep records of dogs injured during a race, trial or sales trial should remain, 5 provided additional supporting comments. The one common theme was that injury records should be collected independently of the track.

Responses to Question 18: Do you agree or disagree that the injury details to be recorded, as required in Condition 6 of the Regulations, are still appropriate?

Summary: 78% of respondents agreed with the statement, with 22% of respondents disagreeing. The most common responses were that while the details were still appropriate they needed to be more effectively monitored and better used to improve welfare. Also, the records should be publically available. There were few specific suggestions as to what further details should be included.

Of the 959 responses that directly addressed this question: 752 (78%) agreed that the injury details to be recorded, as required in Condition 6 of the Regulations, are still appropriate, with 207 (22%) disagreeing.

Agree

Of the 752 responses agreeing that the injury details to be recorded were still appropriate, 285 provided additional supporting comments.

Common comments from those outside the sport, as well as some trainers, owners and breeders, who thought the details to be recorded were adequate, were that euthanasia should be clarified as a treatment if a dog had been euthanized. The records should also be more effectively scrutinised and used to improve welfare. A further common comment from members of the public was that the records should be publically available.

Responses from the industry reiterated that the tracks and the GBGB have been developing a real time injury reporting system which will provide tracks with immediate data regarding their own injury prevalence together with average industry figures.

Disagree

Of the 207 responses disagreeing that the injury details to be recorded were still appropriate, 145 provided additional supporting comments

Amongst those suggesting that the injury details needed changing there were very few specific suggestions. A small number of responses suggested that: location on the track where the injury occurred; the weather conditions; and the age of the dog should also be recorded. Some other responses suggested that a date should be included as to when a dog could return to racing.

Common comments from those outside the sport, as well as some trainers, owners and breeders, suggested that all injuries should be recorded (both minor and major), or that the word 'injury' needed to be defined. A common response was that the details should be more comprehensive (but without any suggestions as to what further details would be useful). There were also common suggestions for the records to be compiled independently and, again, made publically available. A further common suggestion by those outside the sport was that guidelines should be produced to better ensure recording of injuries is standardised.

Responses to Question 19: Should the Regulations be amended to require routine monitoring of the injury records by each track?

Summary: 94% of respondents said yes, the Regulations should be amended to require routine monitoring of injury records by each track, 1.5% said no, while 4.5% said don't know. The most common responses were that this should help tracks identify problems and improve welfare, but that the information must be reviewed independently and published.

Of the 996 responses that directly addressed this question: 935 (94%) said yes to the statement, 15 (1.5%) said no, with 46 (4.5%) responding don't know.

Of the 935 responses saying yes, the Regulations should be amended to require routine monitoring of injury records by each track, 360 provided additional supporting comments.

Common comments from those outside the sport, as well as some trainers, owners and breeders, was that such a requirement would improve welfare and help any problems

specific to a track. However, it was commonly suggested that the information should be published and/or reviewed independently of the track. Some responses from vets also suggested that the information would be better monitored centrally, by the GBGB for example, (with expert veterinary advice when need) with the tracks then informed of any adverse patterns.

Of the 15 responses saying no, the Regulations should not be amended to require routine monitoring of injury records by each track, 12 provided additional supporting comments.

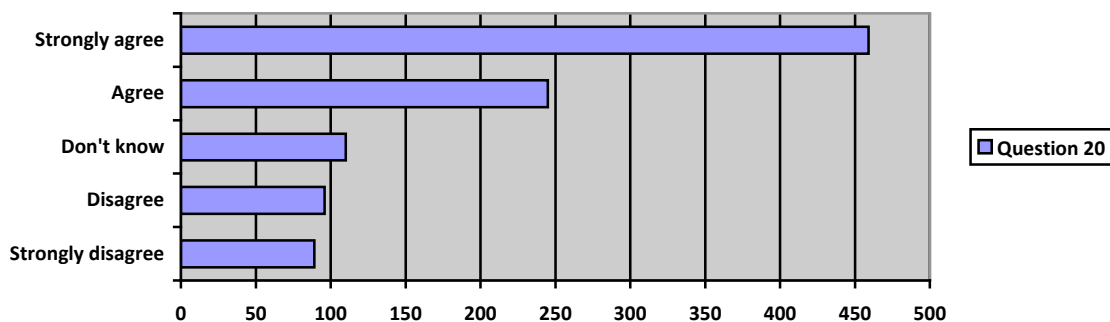
A common comment from those outside the sport, as well as some trainers, owners and breeders, was that injury records should be monitored independently of the track. A common response from within the industry was that injury records were already monitored by the tracks and the GBGB (although some tracks did question whether there was an accepted standard to be measured against by which such data would be compared).

Of the 46 responses saying don't know, 25 provided additional supporting comments. Amongst members of the public, the most common issue cited here was that a lack of transparency by the sport meant they felt unable to answer this question.

Responses to Question 20: To what extent do you agree or disagree with the following statement ‘the non-regulatory agreement by the GBGB to publish, from 2018, aggregate injury and euthanasia figures from GBGB tracks will improve transparency in the sport’?

Summary: 70.5% of respondents responded positively to this statement, 18.5% responded negatively and 11% did not know. The most common responses were that greater transparency was generally seen as a positive, which would raise public awareness of the actual amount of injuries and euthanasia in the sport and improve welfare. A preference for regulation was also often cited, as was a preference for the figures to be published before 2018.

Of the 999 responses that directly addressed this question: 459 (46%) strongly agreed with the statement with 245 (24.5%) agreeing with the statement. 96 (9.5%) disagreed with the statement with 89 (9%) strongly disagreeing with the statement. 110 (11%) did not know.



Strongly agree or agree

Of the 704 responses strongly agreeing or agreeing with the statement, 278 provided additional supporting comments.

A common response from amongst those outside the sport as well as some trainers, owners and breeders was that greater transparency was generally seen as a positive, as it would raise public awareness of the actual amount of injuries and euthanasia that occur, as well as leading to fewer injuries and improved welfare. Other responses from this group, while agreeing with the statement, also felt that the information should be published earlier than 2018. Another common response was that, while the non-regulatory agreement was generally welcomed, some commented that it should be a regulatory requirement. However, no additional supporting evidence, including – in line with the Government's Principles of Regulation - an analysis of the likely costs and benefits (demonstrating that the regulatory approach would be superior by a clear margin to the proposed non-regulatory approach), were suggested.

From within the sport, there was a common view that the agreement will lead to greater transparency, something that some within this group argued the industry urgently needed to address; in order to re-build confidence, transparency and trust with the public.

Strongly disagree or disagree

Of the 185 responses strongly disagreeing or disagreeing with statement, 156 provided additional supporting comments.

A common response from amongst those outside the sport was that the requirement to publish injury and euthanasia figures should be regulated for. Common reasons cited for this were that self-regulation doesn't work, the figures would need to be recorded and monitored independently or that the figures recorded by the GBGB were unlikely to be accurate. A further common response amongst this group was that the figures should be published earlier than 2018. A common response amongst trainers, breeders and owners disagreeing with the statement was that the figures needed to be recorded and monitored independently of the GBGB.

Do not know

Of the 110 who responded 'did not know' to the statement, 39 provided additional supporting comments.

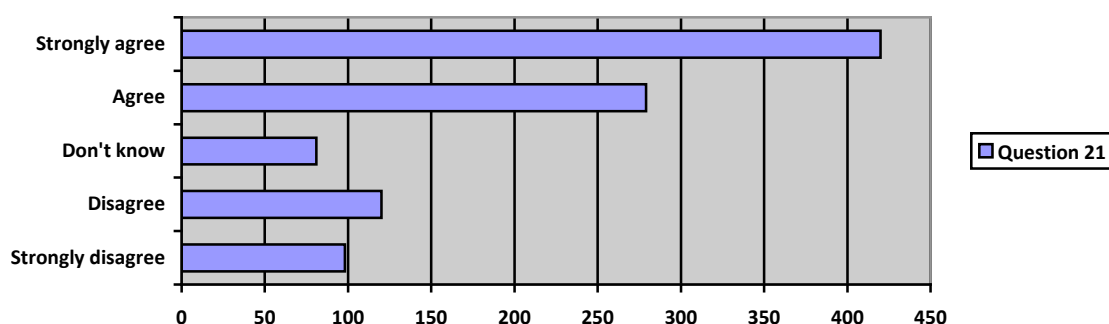
A common response from amongst those outside the sport was that they would prefer that the requirement to publish injury and euthanasia figures should be regulated for. Other common responses were that respondents wanted to see the figures published earlier than 2018 or that they were unsure the agreement would improve transparency or unsure whether the figures would be accurate.

Retirement records

Responses to Question 21: To what extent do you agree or disagree with the following statement ‘the non-regulatory agreement by the GBGB to publish, from 2018, summary statistics for the number of dogs that leave the sport each year will improve transparency in the sport’?

Summary: 70% of respondents responded positively to this statement, 22% responded negatively and 8% did not know. The most common responses were that greater transparency was generally seen as a positive, which would raise public awareness of the number of greyhounds which leave greyhound racing and improve the numbers of greyhounds rehomed. A preference for regulation was also often cited, as was a preference for the figures to be published before 2018.

Of the 998 responses that directly addressed this question: 420 (42%) strongly agreed with the statement with 279 (28%) agreeing with the statement. 120 (12%) disagreed with the statement with 98 (10%) strongly disagreeing with the statement. 81 (8%) did not know.



Strongly agree or agree

Of the 699 responses strongly agreeing or agreeing with the statement, 296 provided additional supporting comments.

A common response from amongst those outside the sport as well as some trainers, owners and breeders was that greater transparency was generally seen as a positive that would raise public awareness of the actual numbers of dogs leaving the sport and their destination, as well as leading to more greyhounds rehomed and improved welfare. Other responses from this group, while agreeing with the statement, also felt that the information should be published earlier than 2018. Another common response was that, while the non-regulatory agreement was generally welcomed, some commented that it should be a regulatory requirement. However, as with similar responses to question 20, no additional supporting evidence, including an analysis of the likely costs and benefits (demonstrating that the regulatory approach would be superior by a clear margin to the proposed non-regulatory approach), were suggested.

From within the sport, there was a common view that the agreement will lead to greater transparency.

Strongly disagree or disagree

Of the 218 responses strongly disagreeing or disagreeing with statement, 178 provided additional supporting comments.

A common response from amongst those outside the sport was that the requirement to publish summary statistics for the number of dogs that leave the sport each year should be included in regulation. Common reasons cited for this were that self-regulation doesn't work, the figures would need to be recorded and monitored independently or that the figures recorded by the GBGB were unlikely to be accurate. Further common responses amongst this group were that the figures should be published earlier than 2018 and that summary statistics alone would not provide sufficient detail of greyhounds leaving the sport. A common response amongst trainers, breeders and owners disagreeing with the statement was that the figures recorded by the GBGB were unlikely to be accurate and this requirement needed to be in regulation.

Do not know

Of the 81 who responded 'did not know' to the statement, 26 provided additional supporting comments.

A common response from amongst those outside the sport was that they would prefer that the requirement to publish injury and euthanasia figures should be regulated for. Other common responses were that respondents wanted to see the figures published earlier than 2018 or they were unsure that the figures would be accurate.

g) Guidance

Responses to Question 22: Do you have any comments on whether it is worthwhile for Defra to retain, updating if necessary, the Guidance for Independent Track Operators?

Summary: In general, most respondents commented that the Guidance of Independent Track Operators should be retained and updated.

There were 588 comments in response to this question.

The most common view expressed by those outside the sport as well as some trainers, owners and breeders was that Guidance for Independent Track Operators should be retained and updated, and that Defra should remain involved in the sport's independent sector. Further common responses also suggested that more should be done to raise awareness of the guidance (including making it a requirement for tracks to keep copies of the guidance). A local authority response added that, alongside the Guidance, they would

like to see a point of contact or knowledge group set up for the small number of local authorities who have an independent track in their area. This contact could help deal with any queries in relation to licensing issues and help promote consistency.

Most of the industry responses came from the GBGB regulated sector and therefore there was little or no comment from the independent sector on the merits of the current guidance.

h) Regulation

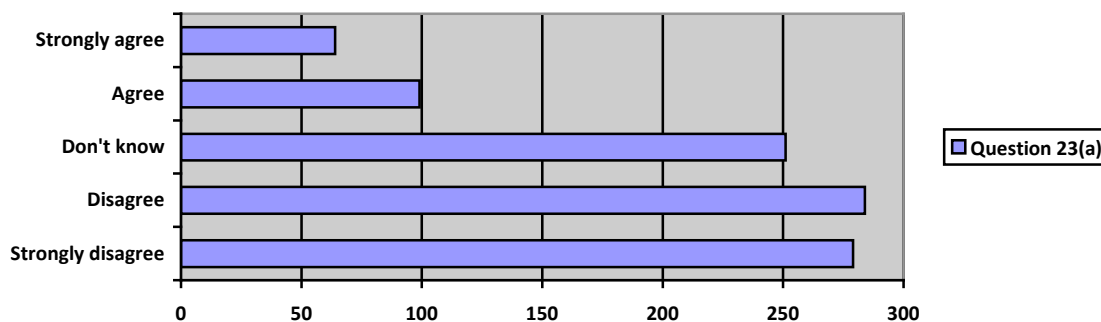
Responses to Question 23: Based on the initial findings of the Review to what extent, do you agree or disagree that the enforcement of welfare standards required by the Regulations is satisfactory at (a) GBGB regulated tracks and (b) local authority licensed tracks?

Summary: 16.5% of respondents responded positively to statement (a), 57.5% responded negatively and 26% did not know. 11.5% of respondents responded positively to statement (b), 55.25% responded negatively and 33.25% did not know. Common responses to statement (a) were that, while some saw GBGB enforcement as effective (as tracks were inspected more often, by knowledgeable inspectors, with UKAS providing independent oversight), others argued that there was still a lack of transparency in the sport, and the standards in the Regulations themselves did not go far enough.

Common responses to statement (b) were respondents did not know enough about what happened at independent tracks, or were concerned that local authorities did not know enough about greyhound racing to be effective enforcers of the Regulations.

(a) GBGB regulated tracks

Of the 977 responses that directly addressed this question: 64 (6.5%) strongly agreed with the statement with 99 (10%) agreeing with the statement. 284 (29%) disagreed with the statement with 279 (28.5%) strongly disagreeing with the statement. 251 (26%) did not know.



Strongly agree or agree

Of the 163 responses strongly agreeing or agreeing with the statement, 47 provided additional supporting comments.

A common response from within the sport and by some vets was that GBGB enforcement was effective as the tracks were inspected more often, by inspectors knowledgeable about greyhound racing, and GBGB's UKAS accreditation provided independent, external monitoring of the process. A further common response by some of those rehoming retired greyhounds, some trainers, breeders and owners of racing greyhounds, and some vets, was that – while enforcement of the standards appeared satisfactory - the standards themselves needed amending or widening (to cover, for example, publication of injury statistics or trainers' kennels).

Strongly disagree or disagree

Of the 563 responses strongly disagreeing or disagreeing with statement, 321 provided additional supporting comments.

The most common responses from amongst those outside the sport as well as trainers, owners and breeders included:

- There was still a lack of transparency by the sport.
- The Regulations themselves did not cover enough areas of the sport (e.g trainers' kennels) or the standards within them were not high enough (i.e. injury statistics were not required to be published). This response was also the common response of most welfare groups.
- Concerns about independence: either the GBGB itself wasn't seen independent enough of the industry to regulate; self-regulation was regarded as not working; or respondents suggesting there should be an independent regulatory body instead.

However, of those responding negatively to the statement, there was no common view (indeed there were very few comments) expressed on the effectiveness of the UKAS accreditation model used in the Regulations (which allows GBGB to regulate standards at GBGB tracks).

Do not know

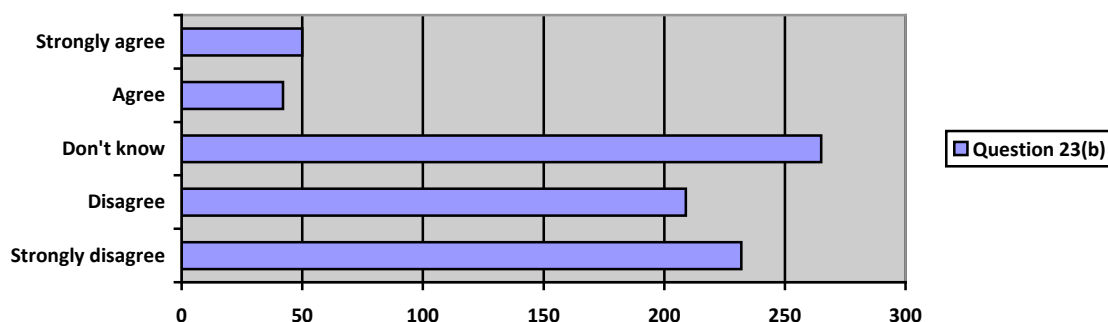
Of the 251 who responded 'did not know' to the statement, 51 provided additional supporting comments.

Common responses from those outside the sport included: a lack of transparency by the sport meant they felt unable to answer this question; and a lack of knowledge of the standards required and how there were enforced also meant they felt unable to comment. A further common response from members of the public with an interest in this topic was that there was always room for improvement. One common view by some trainers,

breeders and owners of racing greyhounds was that, while enforcement of the standards appeared satisfactory - the standards themselves needed strengthening.

(b) Local authority licensed tracks

Of the 798 responses that directly addressed this question: 50 (6.25%) strongly agreed with the statement with 42 (5.25%) agreeing with the statement. 209 (26.25%) disagreed with the statement with 232 (29%) strongly disagreeing with the statement. 265 (33.25%) did not know.



Strongly agree or agree

Of the 92 responses strongly agreeing or agreeing with the statement, 15 provided additional supporting comments.

There was no common response from amongst those outside the sport. From within the sport, although no responses were received from independent tracks, a common response was that independent tracks (licensed by local authorities) were meeting the conditions of the Regulations.

Strongly disagree or disagree

Of the 441 responses strongly disagreeing or disagreeing with statement, 189 provided additional supporting comments.

The most common responses from amongst those outside the sport included:

- There were concerns over how much local authority inspectors knew about greyhounds and greyhound racing; and how much of a priority enforcement of the Regulations was for local authorities.
- The Regulations themselves did not cover enough areas of the sport (e.g. trainers' kennels).
- There were again concerns (but not from welfare groups) about independence, with respondents suggesting there should be an independent regulatory body enforcing standards.

Do not know

Of the 265 who responded 'did not know' to the statement, 60 provided additional supporting comments.

Common responses from those outside the sport included: a lack of transparency by the sport meant they felt unable to answer this question; and a lack of knowledge of the standards required and how they were enforced also meant they felt unable to comment. A common response from those within the sport was that, as they had no experience of independent racing, they felt unable to comment. One response common to some trainers, breeders and owners of racing greyhound and veterinarian was to question how much local authorities knew about greyhounds and greyhound racing.

Additional issues raised in consultation responses

A number of those who responded to the consultation chose not to respond to the specific questions raised, instead providing comments on issues related to greyhound racing. The key issues raised are briefly summarised below.

123 responses were received by email from respondents who either identified themselves as from greyhound rehoming organisations or owners (past or present) of retired greyhounds (23), or otherwise did not provide a definition.

Common concerns and suggestions from this group were:

- Concerns about a lack of transparency in greyhound racing, with calls for legislation to make the industry publish injury, euthanasia and retirement statistics.
- Concerns about conditions at trainers' kennels, with calls for them to be licensed (by the local authority or an independent body).
- Concerns about the independence of track vets, with calls for them to be financially independent of tracks.
- Concerns about self-regulation, with calls for a new independent body to be established to regulate greyhound racing.
- Concerns about finance, with calls for the betting industry to increase its financial contribution to the sport.
- Concerns about the euthanasia of greyhounds, with calls for no greyhounds to be euthanized for economic reasons.

A further 54 responses were received (by email or survey) which just called for greyhound racing to be banned. Sixteen responses were received by email which expressed a very brief (usually negative) view on greyhound racing. Three responses were also received calling for a ban on the use of captive bolt guns on greyhounds.

Finally, a petition was submitted from the Care2 website (a petition website) calling for “Irish Greyhound Racing Welfare Regulations in line with the UK & improve UK welfare regulations”. While the petition looked primarily at greyhound breeding issues in the Republic of Ireland, it also suggested welfare improvements covering breeders’ and trainers’ kennels in the United Kingdom.

Annex: List of organisations who responded to the consultation

Action for Greyhounds

Animal Helpline

Association of British Bookmakers (ABB)

Association of Greyhound Track Vets

Battersea Dogs & Cats Home

Black and Orange Cat Foundation

Blue Cross

Bridge rescue

British Greyhound Racing Fund (BGRF)

British Veterinary Association / British Small Animal Veterinary Association

Burwood retired greyhound kennels

Caged North West

Canine and Feline Sector Group

Care2 (Petition Website)

Catholic Action for Animals

Colorado Greyhound Adoption

Communicate31 Pty Limited

Dogs Trust

EGLR

Federation of British Greyhound Owners Association

Four Paws

GALS greyhound and Lurcher rescue

GRA Limited

Greyhound Adoptions of Florida, Inc
Greyhound Board of Great Britain
Greyhound Compassion
Greyhound Forum
Greyhound Friends UK
Greyhound Rescue Group South Africa
Greyhound Rescue South West
Greyhound Rescue Wales
Greyhound Rescue West of England
Greyhound Trainers Association
Greyhound Star
Greyhounds in Need
Greyt Exploitations
Grey2KUSA
Horse and Hound School
KC Rescue
Kent Greyhound Rescue
KerryGreyhounds UK
League Against Cruel Sports
Lurcher and greyhound rescue
National Companion Animal Focus Group
PET LEVRIERI
Racecourse Promoters Association (RCPA)
Royal College of Veterinary Surgeons
The Greyhound Protection League of New Zealand
Tia Greyhound Rescue

Society of Greyhound Veterinarians

Scottish greyhound sanctuary

United Kingdom Accreditation Service (UKAS)

23 Greyhound racetracks