

[REDACTED](Defra)

From: [REDACTED](DEFRA)
Sent: 28 October 2015 16:26
To: 'Barry.faulkner[REDACTED]
Cc: 'duncan.gibson[REDACTED]
Subject: Correspondence from Minister Eustice
Attachments: Image.pdf

Barry,

Please see attached correspondence from Minister Eustice.

Please note that a paper copy will not follow.

Kind regards

[REDACTED]

Private Office of George Eustice MP
Minister of State for Farming, Food and Marine Environment

[REDACTED]

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Barry Faulkner
Chief Executive
Greyhound Board of Great Britain
6 New Bridge Street
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23 October 2015

From George Eustice MP
Minister of State

Dear Barry

At our meeting to discuss the initial findings of Defra's review of the Welfare of Racing Greyhounds Regulations 2010, I promised to write to you to confirm the actions we would like the GBGB to agree to undertake to address some of the concerns raised during the initial stages of the review. We want to include that agreement in the consultation we will be publishing in November.

As I mentioned during our meeting, the initial findings of our review suggest that the Regulations have broadly met their original objectives. There is now in place a minimum welfare standard at all tracks in England and the traceability of racing greyhounds also appears to have improved. There was also little reason to suggest UKAS accreditation model used in the Regulations wasn't working. However, other areas of concern were highlighted, which we discussed during our meeting. From those discussions, I believe some of these concerns can best be addressed in the first instance by the GBGB.

Trainers' kennels

The Government's Principles of Regulation dictate that where a satisfactory outcome (in this case, securing animal welfare) can be achieved by a non-regulatory approach, then the non-regulatory approach should be taken. We want to be able to consult on the basis of three options, including a non-regulatory approach.

We recognise the work already undertaken by GBGB in raising standards in trainers' kennels and that, as racing greyhounds are sporting animals, any welfare standards for trainers' kennels need to be tailored accordingly. Building on this, we want to be able to set out an option in the consultation of the GBGB developing through the British Standards Institution (BSI) a Publicly Available Specification (PAS) for trainers' kennels. If you agree, my officials will be able to assist you with this. As part of this option, once a PAS has been agreed, we would then want GBGB to obtain UKAS accreditation as a certification body against those standards. Having discussed this with UKAS, we feel that this should be achievable by the end of 2017.

This non-regulatory option would ensure there would be in place an agreed set of standards for trainers' kennels. Those standards would be enforced by inspectors with an in-depth

knowledge of racing greyhound welfare. There would be independent scrutiny of this enforcement through UKAS. I hope the GBGB will be able to agree to us being able to present this as an option in our consultation.

As part of the consultation, we also want to set out an option of setting trainers' kennels standards in regulation, and regulating in a similar manner to the current Regulations – with an exemption for trainers belonging to a UKAS accredited body. Presenting this option in the consultation will allow Defra to consider any evidence that indicates that such a statutory approach is demonstrably superior to the above non-regulatory option.

Publication of injury and euthanasia statistics

The initial findings of the review showed that many people felt strongly the industry needed to be more transparent. I recognise that GBGB can only be held responsible for statistics collected at GBGB tracks and it is now putting in place a robust system to ensure those statistics are collected in a standardised manner. However, as you agreed during our meeting, once that system is fully in place, there is no reason why GBGB should not be able to annually publish summary figures for greyhounds injured or euthanized at GBGB tracks. As with horseracing, this could be presented as a percentage of the greyhounds run each year. I am not yet convinced legislation is necessary in this area, especially if you can agree to begin annually publishing such figures retrospectively, beginning with figures from 2017. Such a move would help improve the transparency of the sport, as well as hopefully demonstrate how few greyhounds are actually injured or euthanised at tracks. We would also want the GBGB to agree to make anonymised track injury and euthanasia data available to others for bona fide research purposes, again beginning with figures from 2017.

Publication of retirement records

Whilst there is no legislative requirement on the industry to keep or publish statistics on the numbers of greyhounds that leave the sport every year, concerns about their fate continue to be voiced. An agreement by GBGB to publish annually summary statistics for the number of dogs that leave the sport each year (and by what method) would again, we believe, demonstrate that the industry can be transparent and that regulation in this area is not required. You said it would take a little time to ensure reporting and collating arrangements are standardised but I hope you could agree to aim to publish the first set of annual figures in the first half of 2018.

I hope that the GBGB can agree to this package of measures, enabling us to consult on the basis of your agreement. In the event that we do amend the Regulations, to reflect the new Microchipping of Dogs Regulations or as a result of the consultation exercise for example, we will need to add to the Regulations a statutory review clause. This means that these issues will be looked at again in five years.

I am aiming to launch the public consultation on the initial findings of the Review of the Regulations early in November and we are drafting the document on the basis that you will agree to this package. I am content for my officials to share the relevant sections of the consultation document with you, prior to publication, to ensure that Defra and GBGB are agreed on the precise wording.



GEORGE EUSTICE MP

[REDACTED] (Defra)

From: Duncan Gibson <[REDACTED]>
Sent: 02 November 2015 13:32
To: [REDACTED](Defra)
Cc: [REDACTED](Defra)
Subject: GBGB response to Minister's letter
Attachments: 2811_001.pdf

Importance: High

Dear [REDACTED]

Please find attached GBGB's reply to the Minister's letter dated 23 October.

I'm working from home today but will call you in the morning to discuss.

A hard copy will not be sent.

Kind regards

Duncan Gibson
Manager of Welfare & Integrity Services



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Greyhound Board of Great Britain

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George Eustice MP
Minister of State
Department for Environment
Food & Rural Affairs
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2nd November 2015

Dear Minister

Thank you for your letter of 23rd October addressed to Barry Faulkner, our Chief Executive. As Barry is abroad, I write to thank you for confirming the actions you would like the Greyhound Board of Great Britain (GBGB) to undertake following concerns raised during the initial stages of the review of the Welfare of Racing Greyhounds Regulations 2010. I am encouraged to learn that the initial findings from the review suggest that the Regulations have, in the main, met their original objectives and that the model of self-regulation combined with Government review and external accreditation has worked.

I am pleased to inform you that I have been authorised by the GBGB Board of Directors to agree to your proposals and for this agreement to be presented as the non-regulatory option in the consultation process. For clarity, I set out the areas of agreement below:

Trainer's kennels

GBGB will put in place an agreed set of standards for trainers' kennels and these standards will be enforced by GBGB inspectors with in-depth knowledge of racing greyhound welfare. In addition, GBGB will ensure that through the British Standards Institution (BSI) a Publicly Available Specification (PAS) is developed for trainer's kennels.

Once a PAS has been agreed, GBGB will obtain an extension to its current scope of UKAS accreditation to include trainer's kennels by December 2017.

Publication of injury and euthanasia statistics

GBGB undertakes to annually publish summary figures for greyhounds injured or euthanised at racecourses licensed by GBGB and for these figures to be presented as a percentage of total greyhound runs each year. GBGB will commence with publishing 2017 figures in the first part of 2018.

GBGB will make available anonymised track injury and euthanasia data available for bona fide* research purposes, beginning with figures from 2017.

Greyhound Board of Great Britain

6 New Bridge Street, London EC4V 6AB

Publication of retirement records

GBGB will annually publish summary statistics for the number of GBGB registered greyhounds that leave the sport each year (and by what method). GBGB will commence with publishing 2017 figures in the first half of 2018.

I am grateful to have received from your officials the relevant extracts from the consultation document and I have asked my Manager of Welfare & Integrity Services, Duncan Gibson, to agree the precise wording with your officials by 3rd November 2015.

Yours sincerely

[REDACTED]

Tom Kelly
Chairman

* Bona fide research purposes as agreed by GBGB Welfare Standing Committee and DEFRA.