

**Evidence from: Dr Rebekah Humphreys, Senior Lecturer in Philosophy, Co-Chair of University Research Ethics and Integrity Committee, University of Wales Trinity Saint David, Carmarthen, Wales, UK; specialist in Animal Ethics and Environmental Ethics.**

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Senedd Cymru | Welsh Parliament

Pwyllgor Diwylliant, Cyfathrebu, y Gymraeg, Chwaraeon, a Chysylltiadau Rhyngwladol | Culture, Communications, Welsh Language, Sport, and International Relations Committee

Bil Gwahardd Rasio Milgwn (Cymru) | Prohibition of Greyhound Racing (Wales) Bill

## **1. What are your views on the general principles of the Bill, and whether there is a need for legislation to deliver the stated policy intention?**

The general principles of the Bill are welcome and ethically sound, and there is a need for legislation to deliver the stated policy intention regarding the prohibition of Greyhound racing in Wales. The reasons for the Bill being welcome and the need for legislation in its regard are numerous, so I will here endeavour to outline that which I consider to be the main one, which is related to the ethical component of the Bill.

Greyhound racing as a practice and the industry more generally causes significant suffering to the dogs bred and used. The extent of the suffering is well documented as involving physical suffering (pain and injury, for example), mental suffering (in the form of stress, frustration and anxiety), and emotional suffering (such as loneliness). (See Animal Aid's material regarding greyhound racing; for more on sports, ethics and animals, see Humphreys, 2010, 2014, and 2020).

The practice currently fails to protect dogs (for the purposes of this written evidence, 'dogs' should be taken to mean 'greyhounds') from risk of injury, stress, and death, seriously preventing their welfare from being considered adequately. The most recent data indicates that the number of deaths from greyhound racing increased by 47% in 2023 compared to 2022, with 26,500 injuries recorded between 2018 and 2023. It is part and parcel of the practice that it cannot but cause significant injury to dogs, with severe injuries often leading to dogs being euthanised (RSPCA, 2024).

Dogs involved are routinely exposed to stress, frustration, and social isolation. They are trained to exhibit an exceptionally high prey drive, yet are rarely permitted to capture the 'prey,' which can lead to significant frustration. Following races, the dogs are normally returned to their kennels, where interaction with other dogs is usually restricted. Daily life in the kennels is inherently stressful, and, unlike companion animals, these dogs rarely receive the socialisation necessary for their well-being. Research indicates that greyhounds spend the majority of their lives in uncomfortable, often barren kennels with minimal environmental enrichment, resulting in a largely solitary and unstimulating existence.

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Moreover, rescue and rehoming charities are already heavily burdened by the number of animals discarded by the sport. These organisations face significant pressure to take in as many as possible, despite the considerable challenges involved in rehoming them, as the alternative often presented by the industry is euthanasia (as reflected in the Greyhound Board of Great Britain's own statistics, 2024 and 2025). Yet the notion that all dogs can retire from racing is misleading. Their elevated prey drive and limited socialisation skills with other animals often makes them challenging to place in many conventional homes. This contributes to a broader issue of abandoned or un-rehomed dogs, placing additional strain on rehoming organisations and limiting the number of dogs that can be successfully integrated into new households.

While it is difficult to quantify the full extent of suffering caused by injury, the structure of the greyhound racing industry inherently restricts dogs' ability to lead a good life and flourish in relation to their species-specific needs and interests, let alone their individual ones. Their fundamental interests in freedom, natural functioning, and wellbeing are compromised throughout their lives (Humphreys, 2010). The conditions and practices within the industry severely limit the opportunity for dogs to engage in behaviours natural to their species, constituting a significant infringement on their dignity. 'Some characteristic features of actions that violate a subject's dignity seem to be that such actions are carried out without the subject's consent, the subject's mental and/or physical being is manipulated or disrupted in some way or another, the intervention is unwanted, and the actions do not purposefully aim to benefit the subject' (Humphreys, 2016). Accordingly, it is clear, from the practice, that the dogs' dignity is violated, excessive instrumentation being a contributing factor. Dogs, however, do have interests of their own and a good of their own, including vital ones, such as an interests freedom (or in exercising their own agency more specifically), functioning, and wellbeing (Humphreys, 2010, 2023). These are unjustifiably overridden within the industry by the more peripheral interests of the gambling industry in making a profit.

In the light of the Well-being of Future Generations (Wales) Act 2015, which emphasises that wellbeing should not be measured solely by economic indicators such as GDP, there is a further rationale for the Bill. Prohibiting greyhound racing would promote a sustainable and ethical approach to the treatment of animals, recognising them as sentient beings with their own interests and welfare—interests that, as a matter of justice, should not be subordinated to the comparatively peripheral pursuit of profit (Attfield and Humphreys, 2016, 2017, 2025).

Moreover, much of the suffering associated with greyhound racing lies beyond the direct control of Wales, as the majority of the dogs are bred and imported from Ireland. Consequently, Wales—and the UK more broadly—lacks the regulatory oversight necessary to ensure the welfare of these animals, providing an additional justification for prohibiting the practice.

## **2. What are your views on the terms used in the Bill, whether defined or not? In particular, are they workable and will they deliver the stated policy intention?**

Having read the Bill thoroughly, I believe the terms of the Bill are workable and effectively deliver the stated policy intention. Importantly, the Bill provides clarity around (all but one of the) key

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terms, ensuring that its provisions can be applied consistently in practice and reducing the scope for ambiguity or legal challenge.

For example, the definition of ‘greyhound racing’ as ‘setting greyhounds to run around a track in pursuit of a lure activated by mechanical means (and this includes timing or training a greyhound as it runs around a track)’ gives precision to the policy’s intention, avoiding doubt about the activities covered by the prohibition while still capturing the full range of practices the Bill seeks to address.

However, I believe it is important to consider the definition of the term ‘greyhound’ in this context. As far as I can see, the term is not defined in the Bill or explanatory memorandum. A broad definition would help prevent the industry from circumventing the Bill by breeding crossbreeds that are not technically classified as greyhounds but still share significant characteristics. In other areas of legislation, such as breed-specific regulation, challenges have arisen due to ambiguity in how breeds or terms are defined. Ensuring clarity here could therefore be beneficial, as a narrow definition may create a loophole that allows the unjustified use of other sighthounds (such as whippets or salukis) if they fall outside the scope of the Bill.

### **3. What are your views on the provisions set out in sections 1 – 3 and Schedule 1 of the Bill -Prohibition of Greyhound Racing? In particular, are the provisions workable and will they deliver the stated policy intention?**

One of the Bill’s strengths lies in its provisions under section 1, which states that ‘A person commits an offence if a person — (a) is an operator of a stadium or similar venue in Wales and uses it, or knowingly permits it to be used, for greyhound racing, or (b) is involved in organising greyhound racing in Wales’. This wording is general enough to ensure that the policy intention can be applied appropriately, while also being sufficiently specific to provide a coherent framework for the sections 2 and 3 to follow.

The subsequent provisions in Schedule 1 build on this foundation in a clear and structured way in relation to ‘commissions of offences’ and ‘proceedings’, setting out the necessary offences in a manner that supports consistency. Together, these elements work towards ensuring that the Bill is both practically enforceable and aligned with its underlying policy goals.

### **4. What are your views on the provisions set out in section 4 and Schedule 2 of the Bill - Enforcement? In particular, are the provisions workable and will they deliver the stated policy intention?**

The provisions set out in section 4 and Schedule 2 on enforcement appear to be both workable and proportionate in delivering the stated policy intention of banning greyhound racing in Wales. By giving enforcement authorities the power to investigate suspected breaches, enter premises (subject to appropriate safeguards), and take necessary enforcement action, the Bill ensures that the ban can

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move beyond being a symbolic measure and instead be practically applied. The clarity of Schedule 1, combined with the enforcement framework in section 4 / Schedule 2, allows for a coherent system in which breaches can be identified and acted upon. The powers conferred are sufficiently robust to deter attempts to organise or facilitate greyhound racing covertly, while the procedural safeguards help ensure that enforcement action is proportionate and consistent with broader principles of fairness.

## **5. What are your views on the provisions set out in sections 5- 6 of the Bill – General? In particular, are the provisions workable and will they deliver the stated policy intention?**

With regards to section 5-6 of the Bill, these provisions for a gradual phase out make the ban enforceable in practice, supporting the intention to eliminate greyhound racing in Wales in a way that is both realistic and legally sound. It will allow time for enforcement authorities to prepare, allocate resources effectively, and engage in public awareness campaigns so that the ban is clearly understood before full enforcement begins.

This measured introduction could therefore reduce resistance, improve compliance, and ultimately ensure that the stated policy intention—bringing an end to greyhound racing in Wales—is achieved in a sustainable and enforceable way.

However, from the point of view of ethics and the lived experiences of dogs currently suffering within the industry, and in relation to the moral defence for this Bill, I would be inclined to recommend a more rapid implementation of the legislation to minimise unnecessary suffering during the interim period before it is fully enforced. But given the significantly reduced scale of the industry in Wales, the practical impact of an accelerated phase-in may be limited.

## **6. What are the potential barriers to the implementation of the Bill’s provisions and how does the Bill take account of them?**

Resistance could be a potential barrier of the Bill by those with vested economic interests in greyhound racing. This is mitigated largely via a phase-in (being no later than 1 April 2030), which gives reasonable time for organisers, landowners, and associated businesses to adapt, reduce reliance on greyhound racing, and make alternative arrangements.

Compliance could present challenges if stakeholders involved in greyhound racing are not sufficiently informed about the scope of the ban. Lack of information may result in intentional breaches. Increasing awareness of the ban would be helpful in mitigating this issue.

There may also be transitional issues related to the need to rehome greyhounds. Whilst I do not think that this would create resistance to the ban from animal charities, it could raise an issue of provision for charities regarding support and funding, particularly in the light of their already strapped resources. The Blue Cross has confirmed that, in collaboration with other organisations, it is preparing to support the rehoming of animals currently used within the industry should the law be

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changed. This will help ensure that no animals are unnecessarily euthanised and that a safe and secure route out of the industry is provided for all affected animals.

### **7. How appropriate are the powers in the Bill for Welsh Ministers to make subordinate legislation, as set out in Chapter 5 of Part 1 of the Explanatory Memorandum)?**

This question would need to be answered by a legal specialist.

### **8. Are there any unintended consequences likely to arise from the Bill?**

One of the unintended consequences of the Bill relates to the beneficial environmental changes to local areas that a ban on greyhound racing would imply. Environmental costs related to the industry are currently externalised onto local communities. For example, drinking and anti-social behaviour are sometimes associated with the sport, particularly in relation to people's attendance at race sites, as well as littering and noise disturbance, with local people having to bear the burden of these consequences. The ban on greyhound racing would have the beneficial result that such problems, as they relate to attendance at stadiums or other venues, would be resolved.

In addition, these sites could potentially be reclaimed for social housing commitments or converted into wildlife areas—consequences that would be welcomed in relation to the aims of the Well-being of Future Generations (Wales) Act 2015.

Moreover, the Bill would influence public sentiment regarding the use and exploitation of dogs for profit, and could thereby have a positive impact in the future in relation to unregulated breeding more generally. This, in turn, could ease the pressure on animal charities, whose capacity for taking in rescued animals continues to be overwhelmed by the increasing number of animals being abandoned.

### **9. What are your views on the Welsh Government's assessment of the financial implications of the Bill, as set out in Part 2 of the Explanatory Memorandum?**

No comment. Financial specialist needed here.

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## **10. Are there any other issues you would like to raise about the Bill and the Explanatory Memorandum or any related matters?**

This Bill sets Wales once again in the lead in terms of animal welfare provisions and sustainable and ethical considerations regarding the future of Wales and its citizens, and will be aspirational for other countries to follow suit. I fully support the Bill and its explanatory memorandum.

I refer, though, finally to the above comment regarding how ‘greyhound’ is being defined. This is something that, I believe, deserves closer consideration should the Bill become law.

Many thanks for your consideration and work on this important Bill.

### **References**

Animal Aid, [Animal Aid](#), 2025.

Greyhound Board of Great Britain, [Licensed-Racing-Track-Injury-and-Retirement-Data-2024-Commentary.pdf](#), 2024, and [Injury and Retirement Data | Greyhound Board of Great Britain](#), 2025 [both reports accessed 3 Oct. 2025].

Robin Attfield and Rebekah Humphreys, ‘Nonhuman Animals and the Scope of Justice’, *Journal of Value Inquiry*, 11 Feb. 2025. <https://doi.org/10.1007/s10790-024-10022-9>.

——— ‘Justice and Non-Human Beings, Part II’, *Bangladesh Journal of Bioethics* (8:1), 2017, 44-77. ISSN 2226-9231 (print); 2078-1458 (online).

——— ‘Justice and Non-Human Beings, Part I’, *Bangladesh Journal of Bioethics* (7:3), 2016, 1-11. ISSN 2226-9231 (print); 2078-1458 (online)

Rebekah Humphreys, *Animals, Ethics and Language: The Philosophy of Meaningful Communication in the Lives of Animals*, Palgrave Animal Ethics Series (Switzerland: Palgrave, 2023).

——— ‘Games, Fair-Play and a Sporting-Chance: A Conceptual Analysis of Blood-Sports’, in *Yearbook of the Irish Philosophical Society*, 2017/18: Special Edition: ‘Humans and Other Animals’ (2020). Published by Irish Philosophical Society, ed. Noel Kavanagh, <http://www.fletcherism.co.uk/IPS/yearbook/>.

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——— ‘Dignity and its violation examined within the context of animal ethics’, *Ethics and the Environment* (21:2), Fall 2016, 143-162.

——— ‘The Argument from Existence, Blood-Sports, and ‘Sport-Slaves’’, *Journal of Agricultural and Environmental Ethics* (published by Springer) (27:2), 2014, 331-345.

——— ‘Game Birds: The Ethics of Shooting Birds for Sport’, *Sport, Ethics and Philosophy: Journal of the British Philosophy of Sport Association* (published by Routledge) (4:1), Apr. 2010, 52-65.

RSPCA, ‘Briefing Document: Ending Greyhound Racing in Wales – July 2024’, [Wales Greyhound Briefing - July 2024.docx](#)

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