



A phased end to greyhound racing in the UK

Summary:

- Data pertaining to the remaining Scottish track and the welfare state of greyhounds is particularly lacking as there is no oversight of this track at all. We are therefore reliant on available evidence from other independent and licensed tracks across Great Britain.
- There are a range of concerns associated with the greyhound racing industry including the inherent danger of the sport, welfare challenges associated with every life stage, high wastage and a lack of transparency and traceability.
- It is impossible for each and every greyhound to experience a good life without substantial and widespread reform of the industry. Transforming the industry is severely limited not only by the ongoing lack of consistent and secure funding streams but because of the multinational nature of the industry and inadequate and inconsistent regulatory provisions within each nation.
- GBGB's welfare strategy is ambitious but fails to fully address the welfare issues throughout the sport, is heavily reliant on other stakeholders to ensure its delivery and is severely lacking in the funding to achieve its aims.
- The UK Greyhound Forum is intended to provide a mechanism to improve greyhound welfare. However, industry representation is limited, as well as the ability of GBGB to act on any welfare recommendations. The scale of improvements needed is so great that we don't believe it is possible for the forum to affect the change needed.
- Dogs Trust and the RSPCA have concluded that the only option to prevent racing from being inherently dangerous for dogs is to call for a phased end to greyhound racing.

1. Introduction:

Dogs Trust and the RSPCA are pleased to provide a written submission setting out our views on greyhound racing to aid SAWC's evidence gathering process. As SAWC are aware, we have recently conducted internal policy reviews on the welfare of racing greyhounds. As a result of these reviews, we are calling for greyhound racing to come to a phased end in the UK.

Within this submission we have provided our concerns with the racing industry [section 2], how this and other evidence shaped our policy [section 3], our views on the UK Greyhound Forum [section 4] as well as GBGB's welfare strategy [section 5].

2. Concerns associated with the racing industry

Within this section we have outlined some key concerns associated with the industry. However, it is important to note that for each and every greyhound to experience a good life from birth to death, widespread reform of the industry is needed. For example, this includes a need for independently funded regulatory oversight, a consistent and secure income stream and an industry-wide transition to racing on straight tracks (see Section 3). We do not believe that such wholesale reform is achievable especially given the multinational and disparate nature of the industry. Taking action on any of the below issues alone, or even a combination, would not be sufficient to enable all greyhounds to live a good life at each and every stage of their lives.

a. Greyhound racing is inherently dangerous for dogs

Greyhound racing is inherently dangerous for the dogs involved. Running at speed around oval tracks causes significant injury to many dogs, and in some cases the injuries are so severe that it is necessary to euthanise the dog as evidenced by GBGB's own data (Table 1).

There is sound evidence from research relating to track-related risks for greyhound injury, including how the track shape, surface, camber (slope), maintenance, starting box design and operation, as well as lure design, have been shown to contribute to racing being inherently dangerous for greyhounds.

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

Information around the number of tracks, dogs, race meetings, races, times and frequency that an individual dog is raced as well as identification of the tracks at which injury and deaths occurred and when a dog died or was euthanased relative to the last time raced would greatly increase with understanding the results but this is not provided.

Unlike the licensed sector, there is no requirement for injury or fatality data to be published by unlicensed tracks and so the true impact of racing on dogs racing on independent tracks is unknown. In Wales (where there is only one independent track) between 2018 and 2021, Hope Rescue's Amazing Greys project helped 200 greyhounds; 40 of these dogs endured serious, career ending injuries.

Table 1. GBGB data on racing greyhound injuries and euthanasia for 2018 to 2021.

| Year | Total injuries | Total dog runs | % of total injuries against total runs | Number of dogs PTS on humane grounds trackside | Number of dogs PTS due to treatment costs/poor prognosis | PTS for humane grounds trackside & treatment costs/poor prognosis as % of total deaths |
|----------------------|----------------|----------------|--|--|--|--|
| 2018 | 4963 | 426,139 | 1.16 | 242 | 180 | 45 |
| 2019 | 4970 | 410,607 | 1.21 | 207 | 123 | 46 |
| 2020 | 3505 | 318,346 | 1.12 | 200 | 24 | 55 |
| 2021 | 4422 | 359,083 | 1.23 | 120 | 9 | 36 |

b. Lack of a secure and consistent funding source:

We are also concerned with regard to the financial stability of the greyhound racing industry. Unlike the horse racing industry, there is no statutory levy in place for greyhound racing despite much discussion with UK Government departments including the Department for Culture, Media and

Sports. Bookmakers do have the option of making voluntary contributions to the industry via the British Greyhound Racing Fund (BGRF), but the voluntary nature of these contributions places the industry in a precarious situation. The contribution from the bookmakers has been set at 0.6% for many years, which at the end of March 2020 equated to £8.8m. However, at the end of March 2021, BGRF reported a decrease of £2m a year and stated that they expected this effect to continue for some time. This will have a profound effect on the funding available for existing and newly proposed welfare initiatives.

Indeed, at the time of the Dogs Trust and RSPCA review, many actions within the GBGB's welfare strategy were unfunded: 46% of short term, 53% of mid term and 80% of long term actions. The absence of funding to realise these goals is concerning and questions the ability for the industry to attain more acceptable welfare standards than currently exist in this current climate and without a significant change in their income source. However, even if the actions were fully funded, the ability for the strategy to achieve a good life for each and every greyhound remains highly doubtful (see Section 5).

A further example of the impact of the lack of funding availability is the Greyhound Retirement Scheme. This scheme releases £400 to rehoming organisations for each greyhound rehomed. However, Dogs Trust data on the veterinary costs to treat 14 injured greyhounds between November 2018 and April 2021 shows that veterinary treatment alone ranged from £690 to £4800. For injured dogs leaving the industry in particular, the £400 is significantly lower than the likely cost required to treat and rehome them.

c. The presence of welfare issues at every stage of the greyhound's life cycle:

There are a myriad of welfare issues reported to affect greyhounds at every stage of their life cycle. To give just some examples, these include the use of artificial insemination for breeding, inadequate socialisation and habituation of puppies as well as tattooing of puppies for identification during rearing, poor environments during schooling, trialling and racing, the use of oestrus suppressants to enable racing, inappropriate transportation at all stages, presence of dental disease and impacts of extreme weather.

d. Inconsistencies in requirements and provisions to protect greyhound welfare:

The greyhound industry is spread across five different nations: the Republic of Ireland, Northern Ireland, Wales, Scotland and England. The regulatory oversight across these nations does not provide a minimum standard for greyhounds that assures a life worth living and there are inconsistencies throughout the different nations. For example, the Welfare of Racing Greyhound Regulations (2010)¹ only apply to England and only to the time greyhounds spend at the race track; not to the other stages of their lives, in particular the trainers' kennels where they spend most of their time. Within nations, there are also inconsistencies. For example, in Scotland the existing track isn't covered by the English regulations, it isn't regulated by GBGB and there is no licensing necessary by the Local Authority meaning that there is no oversight at all.

Despite these types of issues being identified as part of Defra's Post Implementation Review of the Regulations in 2015, the legislation in England has yet to be amended - 8 years after the Post-Implementation Review and 13 years after the legislation was first introduced.

The disparate nature of the industry also limits any impact GBGB can have in making improvements to aspects of a greyhound's life outside the racing stages. For example, within GBGB's welfare

¹ <http://www.legislation.gov.uk/ukdsi/2010/9780111489727/contents>

strategy, the importance of breeding decisions and early years husbandry to lifetime welfare is acknowledged and is one of the reasons that the strategy extends across greyhound's lifetimes rather than focusing exclusively on the dog's racing career. However, it is also stated that the GBGB is only able to implement the substantial proposals in the document within GBGB's jurisdiction which is Great Britain and the licensed sector. With 85% of greyhounds typically born and raised to a year old in the Republic of Ireland, GBGB's ability to ensure a good standard of welfare across all life stages is very limited.

e. Lack of regulations to cover trainers' kennels:

Regulations in England and GBGB's rules of racing require that kennels must be provided for at least 20% of the total number of greyhounds present at the track at any one time for racing or trialling and that the kennels must meet the requirements set out in the conditions. As the track in Scotland falls outside both these sets of regulations there are no standards to regulate trackside kennels.

Regulations in England do not ensure the welfare of greyhounds outside of tracks, despite greyhounds spending the majority of their time in trainers' kennels, and instead guidance is issued within the Greyhound Board of Great Britain's voluntary code of practice. The extent to which training is provided to aid compliance with the code is unknown as well as how it is enforced. Again, Scotland's track is not governed by GBGB and so there is no regulatory protection for trackside or trainer's kennels. Given that many greyhounds spend the vast majority of their time in trainers' kennels, this is critical, especially as a Dogs Trust investigation in 2015 provided stark evidence that the current regulations are insufficient to address the welfare concerns associated with trainers' kennels.

f. Lack of transparency and traceability:

Without full transparency relating to the number of dogs being born in, or imported to the UK, registered, and entering the racing industry each year, their subsequent racing longevity and clear exit data (i.e., in clearly defined, explainable and stable categories over time) it is challenging to understand the passage of individual greyhounds and their welfare experience. With most dogs bred, reared and educated on private properties outside of the UK, there is little or no visibility of the whole life experience of greyhounds in the UK racing on GBGB tracks, and even less for greyhounds racing in the independent sector. There is no UK-wide (compatible with Ireland) database for greyhounds; other countries are undertaking national traceability programs (e.g. The [National Horse Traceability Working Group](#) in Australia).

There is no data available about the track in Scotland and even those tracks governed by GBGB do not publicly display or release injury data by racetrack, outcomes of licensing inspections or residential kennel audits. Additionally, no evidence is provided to demonstrate how such information is collated and informs industry development to ensure meaningful changes are made.

g. High levels of wastage:

The issue of oversupply and wastage has long been a concern within the greyhound racing industry. There is no data available about the independent industry although data from GBGB highlights the need to eliminate oversupply and wastage. Data from the last five years shared by GBGB, excluding the dogs that are euthanased or die, shows that by the age of 3.5yo, 50% of greyhounds registered to race have left the licensed racing industry and by the time greyhounds are 4yo only 30% remain. The greyhound lifespan is between 10 and 14 years, however, around 65% of greyhounds leave the

licensed racing industry between the ages of 2-4yo and 90% of greyhounds are no longer racing by 5 years of age.

In 2021, there were 12,960 Irish bred puppies registered at the time of whelping yet approximately 10% were not registered at 12 months of age meaning over a 1000 puppies were unaccounted for. In Great Britain similar patterns were seen with around 13% less dogs being registered to race under GBGB compared with numbers of puppies registered on the Greyhound stud book.

h. Reliance on the charity sector for rehoming:

There has been a steadily growing role of rescue and rehoming agencies in finding homes for greyhounds exiting GBGB-licensed racing, which is around 5,000 dogs annually (range 4,297-5,484 per year observed over the last five years). Charities have rehomed over 70% of these greyhounds, with The Greyhound Trust responsible for the majority (3,761 in 2020, plus an additional 157 greyhounds transported from Ireland by Greyhound Racing Ireland for rehoming within the UK).

i. A declining industry:

In the 1940s, there were 77 licensed tracks and more than 200 independent tracks in the UK. The numbers have steadily declined to 23 active regulated and three independent tracks on which greyhounds race in 2022. The industry has also witnessed a significant long term decline in attendance which has accelerated in recent years. Attendances dropped from 2 million in 2010 to 1.4 million in 2018. Globally, greyhound racing is in decline and only exists legally in seven locations: the UK, Ireland, Australia, New Zealand, the United States of America, Mexico and Vietnam.

3. The development of Dogs Trust and RSPCA policy on Greyhound Racing

As part of our independent review, the following changes were identified which would be necessary to help racing greyhounds experience and be assured of a life worth living:

- ★ Compulsory and independently enforced five domains model-based animal welfare standards for all greyhounds
- ★ One UK wide, Republic of Ireland compatible, microchip based identification and fully transparent database allowing real time data to be accessed online and publicly accessible across all life stages.
- ★ Transparent collection and independent verification of birth, death and injury data.
- ★ Accountability for dogs exiting racing
- ★ Independently funded regulatory oversight and enforcement
- ★ Unannounced animal welfare checks and enforcement
- ★ Address oversupply and wastage of greyhounds
- ★ Mandatory education and background animal welfare checks for all participants
- ★ Disciplinary matters to operate independently from commercial and oversight bodies
- ★ Independent regulatory body to proactively address the use of banned substances
- ★ Public reporting of enforcement outcomes
- ★ Action on racetrack safety to eliminate the danger of injury and death. The evidence base indicates an industry-wide transition to racing on straight tracks is required.
- ★ Export of greyhounds outside of the UK to be banned
- ★ Funding security for greyhound welfare assurance

Recognising that significant changes are necessary to provide a good life for racing greyhounds, a range of options for future action were identified. The options ranged from continuing to work with industry toward the goal of transparently enforced high welfare standards through to calling for an

immediate ban on greyhound racing. As well as identifying the welfare impact of the options and those which could guarantee racing greyhounds a good life, each was also considered with the following in mind:

- ★ the provision of sufficient financial resources for greyhounds at all stages of their life to ensure they experience a life worth living
- ★ impact on employment and alternative careers
- ★ political appetite and
- ★ public attitudes and calls for change.

The outcome of similar options in other geographies were also considered. ***The only options presented within the review that could prevent racing from being inherently dangerous for dogs were those involving a phased end to, or immediate ban on greyhound racing.***

Dogs Trust and RSPCA subsequently separately reviewed and changed their policy positions to call for a phased end to greyhound racing across the UK. We are specifically calling for a phased end to racing rather than an immediate ban so that we can carefully plan and coordinate the care of the many dogs who will be affected. Based on the current rehoming rates and channels, it is expected that an end is feasible within five years given the number of dogs in the industry.

4. The UK Greyhound Forum:

The Greyhound Forum comprises animal welfare organisations and industry bodies working together to improve racing greyhound welfare. Dogs Trust and the RSPCA have been working with the greyhound racing industry for many years to try to improve conditions for the dogs involved in the sport. While this has led to some improvements, the charities believe there are still significant welfare issues for racing greyhounds which have not been resolved and cannot be resolved.

Examples of improvements to welfare which have been achieved via the Forum include the banning of anti-bark muzzles in trainers' kennels. A further example is the development of the GBGB fireworks policy. However, despite the introduction of welfare based policies marking some progress to improve welfare, robust provisions provided by the welfare members are typically rejected by GBGB. Despite being the regulator of the sport it appears their ability to act is limited. For example, when considering the fireworks provisions, they stated that they are unable to stop racing, they can only advise that racing is scheduled sympathetically. Furthermore, although improvements made by the forum have the potential to safeguard greyhound welfare, overall their welfare impact is fairly limited. Issues which have the potential to improve the welfare of all dogs within the industry and to an acceptable standard, for example, changing the shape of the racetrack or ensuring transparent data collection, have not sufficiently progressed and we do not believe that sufficient progress can be made by the Forum in its current form.

We are unconvinced that the current structure of the Forum is sufficient to achieve the significant change needed to resolve these serious welfare concerns. As one example, the industry representation on the Forum is limited to the GB regulated sector only and does not include representatives from RoI or independent tracks (including the independent track in Scotland).

Following a change in policy, there has been much discussion about whether or not Dogs Trust and the RSPCA should remain members of the forum. It has been agreed that both organisations can

remain members with the terms of reference revised accordingly although Dogs Trust and RSPCA will not be able to attend parts of the forum meeting where confidential information is being shared which does suggest that the two organisations are not full members unlike others, and will therefore have limited welfare influence. This arrangement will be revisited once the new approach has been tested over a number of meetings.

5. The GBGB's welfare strategy:

Dogs Trust and the RSPCA have several concerns around the GBGB's welfare strategy. While it is stated that GBGB sought, received and listened to a wide range of views and comments on current and aspirational welfare through engagement with stakeholders including canine welfare charities (members of the Greyhound Forum), our input was very limited and extended to a paper based exercise which invited us to identify welfare issues associated with each stage of the greyhound's life using the five domains welfare framework.

Unfortunately the welfare members of the Forum were not invited to comment on any early drafts of the strategy and were unaware about its publication until its release was imminent. Furthermore, there were no discussions held with Dogs Trust or RSPCA about the need for partnership working to ensure the delivery of the strategy. This reliance on partnership working calls into question the likelihood of, and ability for, the strategy being fulfilled. As such, we are particularly concerned that should the strategy fail to deliver, it would not only be GBGB who are held to account but other stakeholders too.

Having reviewed the strategy and understanding its intention to provide a good life for greyhounds, we are concerned about its failure to consider all the factors likely to affect the welfare state and quality of life of racing greyhounds. For example, actions which would provide behavioural opportunities and improve the dog's emotional state are lacking in comparison to the focus on health and nutrition. Furthermore the need for greyhounds to be psychologically (adaptable to new environments and stressful situations) and physically resilient (breed for resilience rather than speed) suggests that the dog needs to adapt to the industry rather than changing the industry to ensure it is welfare compatible.

There are also very clear omissions from the strategy which, if included, could better protect the welfare of the dogs involved. Greyhound racing is inherently dangerous for the dogs involved and running at speed around oval tracks causes significant injury to many dogs, and in some cases death. The failure to look at changing the shape of the racetrack and in the absence of radical change leaves greyhound racing open to injuries to dogs and unnecessary deaths.

ENDS.

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