

## PGRWB 03 GREY2K USA Worldwide

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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](#)

Ymateb gan | Response from: GREY2K USA Worldwide

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### **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?**

GREY2K USA Worldwide exists to end the cruelty of greyhound racing. It is our strong belief that an industry built on cruelty to dogs has no place in modern society, and therefore we are grateful to have the opportunity to share our views with the Committee.

We wholeheartedly support the general principles of the Bill, and specifically the intention to use legislation to end greyhound racing in Wales, as opposed to regulations or licensing. We believe that legislation is the only route to deliver the stated policy intention within the draft Bill.

Our position is very clear that we do not think licensing is an appropriate response to this problem, and only a full ban on greyhound racing, implemented through legislation, will end the cruelty and suffering caused by this gambling-led industry, and prevent a resurgence in the future.

A report by the Scottish Animal Welfare Commission (SAWC), referenced in your explanatory memorandum, concluded that welfare for dogs would be improved if they were not involved in racing, something which can only be enforced with legislation.

The SAWC report found all racing greyhounds face inherent risk of injury or fatality and other welfare harms. It also noted that GBGB's Welfare Strategy attempts to modify the greyhound to meet human demands, over-interprets preliminary data and is unlikely to have a significant impact on reducing injury rates in racing greyhounds in the foreseeable future. SAWC was also sceptical that GBGB could enforce changes in the industry, as its jurisdiction is limited to the time

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greyhounds spend at the racetrack and it is reliant upon voluntary contributions from stakeholders.

Ultimately SAWC was left unconvinced the GBGB could ensure a good quality of life for greyhounds. SAWC did not see a strong desire in the industry to make the radical changes necessary to mitigate welfare risks and allow for good welfare to be maximised. No licensing scheme could achieve good welfare when the industry itself is unprepared to adopt substantive changes.

Despite the SDAWC report being commissioned by the Scottish Parliament, it is entirely relevant to the debate in Wales also, and for all the reasons outlined above, illustrates why we are very strongly in favour of legislation to end greyhound racing in Wales, over any other approach.

**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?**

Yes, it is our view that the Bill clearly states what the policy intent is, and the terms and language used within the Bill are clearly defined, well-targeted and sufficiently strong to prohibit greyhound racing as the Bill intends.

**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?**

The provisions set out in sections 1-3, and in Schedule 1 of the Bill are more than sufficient in our view to deliver the policy intention of the Bill. Complex legislation is not required for this issue, and the aim of ending greyhound racing will be delivered through prohibiting the activity as is clearly set out in the Bill.

**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?**

Again, it is our view that the provisions set out in section 4 and Schedule 2 are well tailored to deliver the policy intention of ending greyhound racing in Wales. The offences are clearly defined along with the enforcement powers in relation to these. In particular, the detail of Schedule 2 is sufficient, leaving no doubt that enforcement will be undertaken, and will not open loopholes which can be exploited.

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**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?**

Yes, we think the provisions in sections 5 and 6 of the Bill are workable and will support delivery of the policy intent of the Bill. In particular, we think the timescale for the Bill coming into force is reasonable to allow for suitable homes to be found for greyhounds requiring adoption, and takes into account the responsibility this will place on animal welfare charities tasked with homing these dogs.

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

There are potential barriers around welfare, logistics and enforcement but it is our view the Welsh Government has recognised where these potential issues lie, and given careful consideration to mitigating them. In particular, by creating an implementation group, bringing together experts and key stakeholders in such a way, potential barriers can be addressed and overcome as the legislation progresses.

**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?**

It is appropriate for Welsh Ministers to have the power to make subordinate legislation by Order to commence specified sections of the Act relating to greyhound racing. Commencement Orders are a standard and suitable mechanism to ensure that provisions come into force only when the necessary delivery, administrative, and enforcement arrangements are in place. The power is procedural, limited in scope, and aligns with normal devolved and legislative practice.

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

The consequence which of course must be given the utmost consideration is to the welfare of racing greyhounds, and while advocates for racing will argue that an end to greyhound racing could impact negatively on their welfare, we know from experience that suitable transitional arrangements, together with engagement with welfare organisations can mitigate any risks. We believe that the timescale outlined in the Bill will ensure there are no unintended consequences from an animal welfare perspective.

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However, we do believe that an unintended consequence which could arise is the increase in individuals transporting greyhounds across the border to race in England, where greyhound racing remains legal. This has the potential to undermine the welfare benefits as is the policy intention of the Bill.

**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?**

We are satisfied that the Welsh Government's assessment of the financial implications of the Bill is adequate.

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

We would like to reiterate our support for this Bill, and the leadership shown by the Welsh Government on this issue.

GREY2K has over two decades of experience working in multiple jurisdictions to end greyhound racing and has been pivotal in ending the cruelty of dog racing worldwide. In the USA dog racing is illegal in 44 states, with racing only taking place now in West Virginia. In our 23 year history we have closed down more than fifty tracks in the United States, the only legal dog tracks in China and Vietnam and also prevented the legalisation of greyhound gambling to countries such as South Africa, Jamaica, and the Philippines.

We would welcome the opportunity to share the extensive experience we have of being involved in bringing forward legislation to end greyhound racing with the Committee, and would welcome the opportunity to give oral evidence should that be required.

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