

PGRWB 27 Arena Racing Company

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: Arena Racing Company

Please note, Arena Racing Company (ARC) is the operator of five greyhound racing stadia, all located in England (Central Park, Dunstall Park, Newcastle, Nottingham and Sunderland). ARC opened Britain's newest greyhound racing stadium, Dunstall Park in Wolverhampton, in September 2025, with greyhound welfare at the heart of the design and development of the racing surface and supporting facilities.

ARC stands behind and supports the responses to this consultation as supplied by the Greyhound Board of Great Britain (GBGB) and Premier Greyhound Racing (PGR), the latter of which ARC is a shareholder. More widely, ARC is proud to fully support GBGB's welfare strategy, '[A Good Life for Every Greyhound](#)'.

ARC takes the welfare of all greyhounds affiliated with, and running or trialling at, our stadia very seriously, and invests in a range of initiatives to increase welfare standards and minimise risk. These include an injury recovery scheme for all greyhounds running or trialling at an ARC Stadium, which covers the costs of veterinary services for any injured dog, with our affiliated veterinary practices.

Each ARC stadium is affiliated with at least two local GBGB accredited rehoming centres and makes significant efforts to promote rehoming across all our 21 venues across the country.

In addition, ARC contributes £100 to each British Bred Greyhound Retirement Scheme bond payment for all stadia affiliated greyhounds. The scheme offers a £420 bond for each British bred greyhound to cover rehoming costs on retirement.

For clarity, ARC does not operate any greyhound racing venues in Wales.

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?

ARC is fully supportive of the GBGB welfare strategy and the strict licencing requirements that are placed on venues such as ours to operate greyhound racing.

The Prohibition of Greyhound Racing (Wales) Bill makes it an offence to operate a stadium or similar venue in Wales and use it, or knowingly permit it to be used, for greyhound racing. The Bill also makes it an offence to be involved in organising greyhound racing in Wales. “Greyhound racing” is defined as setting greyhounds to run around a track in pursuit of a lure activated by mechanical means and includes timing or training a greyhound as it runs around a track.

The stated policy intention of the Bill is simply to ban greyhound racing in Wales. Whilst the proposed legislation may deliver this objective, **Members of the Senedd should be clear that the policy intention and the general principles of the Bill, which focus exclusively on banning greyhound racing, will be detrimental to greyhound welfare.** The Bill offers nothing which will promote meeting greyhounds’ welfare needs across their lifetimes – needs which are met, across the Five Domains of animal welfare, through evidence-based policy making and effective enforcement when greyhound racing is regulated by the GBGB, rather than banned.

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?

The stated policy intention is to ban greyhound racing. The Bill offers nothing which will promote meeting greyhounds’ welfare needs across their lifetimes. **That makes it explicitly clear that the Bill is not a serious piece of animal welfare legislation** but is instead based in animal rights views. Greyhound welfare is best protected when racing occurs in a public space with societal scrutiny and where regulation provides enforceable mechanisms of optimising greyhound welfare for the entirety of the dogs’ lifespan, across the five physical and psychological domains. Greyhound welfare is least well protected when the sport is banned because that runs the risk of greyhound racing occurring illegally, out of public view, with no regulation. Currently, there is only one operational greyhound track in Wales, which is licensed by GBGB. **The Bill to ban greyhound racing will inevitably put greyhound welfare at higher risk than it currently is in Wales because it will result in the cessation of greyhound welfare safeguarding through regulation by the Greyhound Board of Great Britain.** This regulation, through the

GBGB's [Welfare Strategy](#), combined with GBGB [Rules of Racing](#) and evidence-based policies and guidance currently protects the welfare of racing greyhounds for the entirety of their lifespan and across all five physical and psychological Domains of animal welfare.

Some brief examples of the ways in which greyhound welfare is safeguarded through GBGB regulation are provided below at the end of the response to this question. As those examples illustrate, GBGB regulation demands welfare standards which demonstrably provide racing greyhounds with 'good lives', as defined in animal welfare science (please refer to GBGB's [short-](#) and [medium-](#) term reports on its Welfare Strategy). **If the Welsh government is truly committed to improving animal *welfare* (rather than to meeting the demands of animal *rights* organisations) then instead of introducing this Bill to meet a very narrow, animal rights-based policy intention of banning greyhound racing it would legislate instead to safeguard animal welfare by maintaining greyhound racing as a legal activity and insisting that in future all greyhound racing in Wales be regulated by the Greyhound Board of Great Britain.**

Brief examples of the ways in which greyhound welfare is safeguarded through GBGB regulation:

As regulator, GBGB ensures that the welfare of racing greyhounds is of paramount importance within licensed racing. Through their Greyhound Commitment and over 200 [Rules of Racing](#), GBGB seeks to ensure that the health and wellbeing of all registered greyhounds are promoted and protected at all times.

Importantly, GBGB has a zero-tolerance approach to any mistreatment of greyhounds and does not hesitate to take the strongest action against any form of animal mistreatment. Through their investigations team, they explore any concerns regarding welfare and integrity. They follow a strict disciplinary process to address any breaches of the Rules of Racing, which is overseen by an independent disciplinary panel. GBGB is prepared to impose the necessary sanctions including a lifetime ban from the sport.

As an indication of their high welfare standards, GBGB is the only UK sports regulator to be accredited by [UKAS](#). This UKAS standard, which covers both licensed tracks (included all operated by ARC) and greyhound trainers' residential kennels, exists alongside the BSI PAS 251:2017 technical specification and GBGB's [Code of Practice for Residential Kennels](#).

In 2022, GBGB launched its long-term welfare strategy, [A Good Life for Every Greyhound](#), which seeks to enhance the welfare standards across the sport. Developed under the leadership of Professor Madeleine Campbell, who is an EBVS® European Veterinary Specialist and RCVS Specialist in Animal Welfare Science, Ethics and Law, this comprehensive and wide-ranging strategy seeks to further optimise the care and protection registered racing greyhounds receive throughout their lives – not just the period they are racing. The strategy has been externally peer-reviewed by respected veterinarians in the field of animal welfare. They provide regular updates on progress to the Greyhound Forum which includes representatives from key animal welfare charities such as Battersea Cats and Dogs Home, The Kennel Club and the Greyhound Trust.

Through their Rules of Racing and welfare strategy, welfare standards and protections afforded to racing greyhounds far exceed those that exist for the pet dog population, where there is no monitoring in place to demonstrate welfare standards.

In practice, this means:

Breeding

- Whilst GBGB's regulatory remit does not extend to the breeding and rearing of greyhound pups in Britain, GBGB believes it shares responsibility to ensure that all racing greyhounds have the best possible start to their lives. Through the welfare strategy, GBGB committed to furthering its support of high-welfare British breeding.
 - In 2024, 15.5% of the greyhounds registered with GBGB were from British-bred litters (up from 13.1% in 2021), with the remainder originating from either Northern Ireland or the Republic of Ireland. The overall number of Irish greyhounds entering racing in Britain has decreased by 26% since 2021. These changes are in alignment with GBGB's welfare strategy which sought to increase the number of British-bred greyhounds and minimise the potential welfare and biosecurity risks associated with international transportation of greyhounds. GBGB continues to work closely with Greyhound Racing Ireland (GRI) to ensure the traceability of greyhounds entering GBGB racing from Ireland or returning to Ireland for racing or breeding.
 - In August 2025, GBGB announced that it is developing a registration system for British-bred greyhounds. This move is intended to streamline the process,
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support British breeding and ensure greater oversight by GBGB from a greyhound's birth.

- GBGB provides education opportunities on breeding and rearing, including a recent live webinar series delivered by Professor Gary England, a leading expert in canine reproduction.
- GBGB will shortly publish a new comprehensive Code of Practice for Breeders and Rearers of Racing Greyhounds, informed by research field visits to established greyhound breeders and rearers and developed with expert welfare and veterinary input. This will provide advice and guidance for raising healthy and well-socialised greyhounds and will be shared with our international regulator colleagues to promote best practice.

During their racing career – at the track

- Under the Rules of Racing, the vehicles trainers use to transport their greyhounds to and from the track must be adequately air-conditioned; since June 2021, when it became a requirement for vehicles to be air-conditioned, over £2 million has been spent within the industry on replacement vehicles or upgrading existing air-conditioning units.
 - There must be at least one veterinary surgeon in attendance at GBGB-licensed racecourses for any races or trials. Their role is to check each greyhound before, during and after they race, monitor disease control and administer emergency care in the event that this becomes necessary.
 - GBGB-licensed stadia benefit from GBGB's multi-year collaboration with internationally recognised experts [STRI](#). Each stadium receives four STRI inspections a year which allows experts to assess the track in all seasons. Through these regular visits, STRI consultants make recommendations designed to optimise the safety of the running surface. In 2024, STRI conducted 80 visits to GBGB-licensed racecourses. ARC is proud to work closely with STRI across all of our five stadia, and in the recent development of the new track at Dunstall Park.
 - GBGB also has a national Track Liaison Officer who provides assistance to track staff and makes regular visits to stadia during the year.
 - Track staff have access to a regular programme of continuing professional development which covers track preparation and maintenance as well as how to care for greyhounds whilst at the track.
 - In 2024, GBGB published its [Track Maintenance Guide](#) – a substantial resource developed through a collaboration between Dr Christian Spring, Group Principal Scientist for STRI, GBGB's Track Liaison Officer and the GBGB
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Track sub-committee. The Guide provides an invaluable continuing education and reference resource for all racecourse stakeholders. Importantly, it not only provides clear guidance on all stages of the track maintenance process – construction and layout, infrastructure, preparation and troubleshooting – but also provides information on where stakeholders can seek expert help and emphasises the need for an evidence-based, scientifically informed and flexible, proactive approach.

- The continuous improvements in track safety and the provision of veterinary treatment at the track have led to significant improvements in the track injury and fatality rates. Most notably, between 2018 and 2024, the track fatality rate decreased by 50%, from 0.06% to 0.03% and in 2024, licensed racing saw its lowest ever injury rate of 1.07% – down from 1.21% in 2021.
 - GBGB meticulously and accurately records all injuries sustained at licensed tracks – going beyond what has been requested by Defra. Not only does this show GBGB’s commitment to transparency and accountability it also allows our Track Liaison Officer and Track Safety Committee to identify any concerning trends and take immediate action to prevent any further injuries.
 - If a greyhound sustains a career-ending injury on a licensed track, they are eligible for financial assistance through our Injury Retirement Scheme (IRS). Through the IRS, funding is provided towards corrective veterinary treatment for orthopaedic injuries so that, wherever possible, greyhounds can go on to enjoy a full and active life in retirement. Since the scheme was introduced in 2018, GBGB has paid out over £1.4 million to support the veterinary treatment of registered greyhounds. ARC operates such an injury recovery scheme for all greyhounds either running or trialling at an ARC stadium, which covers the costs of treatment in the event of an injury taking place during racing or trialling.
 - As a result of the IRS, GBGB has seen a dramatic fall in the number of greyhounds put to sleep for economic reasons following an injury sustained while racing. This figure has fallen from 175 in 2018 to just three in 2024 – a decrease of 98%. GBGB believes that it is unacceptable for a dog to sleep for economic reasons and remains committed to reducing this number to zero.
 - To see further improvements in this area, Premier Greyhound Racing (PGR), of which ARC is a shareholder, is currently funding two academic research projects at the University of Nottingham specifically looking at injury prevention. These projects are looking at the causes of injuries in racing
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greyhounds and how modern technologies could be used to help detect sub-clinical injuries and inform decisions about early treatment and rest.

- Each GBGB-licensed racecourse is subject to annual inspections as part of GBGB's wider regulatory programme. Stadia also receive regular visits throughout the year from GBGB's Stipendiary Stewards.
- Each racecourse has access to GBGB's Track Safety Committee Fund which funds investments into track equipment and safety infrastructure. In 2024, grants totalling £168,000 were issued for equipment and infrastructure improvements.
- Tracks must adhere to GBGB's Hot and Cold Weather Policies, which seek to optimise the comfort and wellbeing of greyhounds during periods of very hot or very cold weather. Within the policies, which are reviewed annually, GBGB has set out at which temperatures racing must be cancelled. These limits are based on the latest veterinary advice on maintaining a greyhound's thermo-neutral zone of between 10°C and 26°C. The policies also set out the measures that must be taken to keep greyhounds comfortable at the track (e.g. cooling baths, reducing parade times) and when travelling to and from it.
- To safeguard greyhound welfare and the integrity of the sport, thousands of regulatory samples are taken each year to ensure that greyhound racing is a drug-free sport. Working alongside LGC, a world-leading independent drug surveillance laboratory, and other international regulators, GBGB has developed an effective and modern testing and intelligence programme which acts as a deterrent against the use of prohibited substances.
- Since 2017, all greyhounds registered by GBGB must have a 'Point of Registration' sample to ensure that each greyhound begins its GBGB career free of any long-acting prohibited substances, whilst a mixture of random or intelligence-led race day samples are taken throughout the year across all racecourses.

During their racing career – at their trainers' kennels

- Each year, licensed trainers' residential kennels must receive:
 - A veterinary inspection which examines all aspects of the greyhounds' care, health and wellbeing;
 - An audit by independent auditors SCI to ensure they meet the standards required by the British Standards Institute's (BSI) Publicly Available Specification (PAS) for greyhound trainers' residential kennels – PAS 251: 2017.
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- All trainers also receive separate visits to their residential kennels during the year from GBGB Stipendiary Stewards and GBGB Regional Regulatory Vets (RRVs).
 - In January 2025, GBGB's team of RRVs began conducting their trainers' Annual Veterinary Kennel Inspection, which was previously carried out by either a veterinarian from the trainer's local practice or a track veterinarian. The new RRV annual veterinary kennel inspections are in a more thorough format than previously used and include, for example, an inspection of every greyhound accommodated within the kennels – whether or not they are actively racing.
 - Since the launch of the welfare strategy in 2022, there has been a 73.2% increase in the total number of routine GBGB visits to residential kennels. In 2024, on average, each licensed trainer received three visits to their kennels by GBGB field staff as well as an audit inspection by SCI and an external veterinary kennel inspection. In addition to routine visits, GBGB carries out risk-led more frequent monitoring visits of specific kennels if it is deemed necessary.
 - Any failures of compliance with the UKAS accredited standards result in improvement notices, and failure to make required improvements means that a trainer does not have their GBGB licence renewed.
 - Licensed trainers have access to the Trainers' Assistance Fund, which provides grants for trainers to upgrade and improve their residential kennel facilities. In 2024, £503,910 was awarded via the Trainers' Assistance Fund for trainers to upgrade their kennel and paddock facilities.
 - In 2020, GBGB introduced – in consultation with animal welfare charities and veterinary professionals – a comprehensive [Code of Practice for Residential Kennels](#) which sets out clear rules and guidelines on how greyhounds should be looked after at their trainer's kennels. This includes specific requirements around diet, bedding, kennel construction and size, dental care, environmental enrichment as well as daily exercise routines.
 - Licensed trainers have access to continuous professional development, which leverages the latest in scientific research and innovations, in the form of a regular programme of workshops and webinars involving leading veterinarians and academics, including on nutrition and understanding kennel sickness. To maximise engagement, these courses are delivered free of charge. Trainers also benefit from the support and expertise of GBGB's
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Executive Veterinarian and a team of RRVs who are available to give advice and guidance on any aspect of greyhound welfare as required.

Into Retirement

- GBGB has full traceability of every racing greyhound throughout their careers. Upon a greyhound's eventual retirement, all greyhound owners must adhere to GBGB's [Responsible Homing Policy](#) and inform GBGB of the retirement destination of their greyhound. The microchip of retired greyhounds is registered in a pet canine database, ensuring that traceability is maintained after greyhounds retire from racing.
 - Through the Greyhound Retirement Scheme (GRS), GBGB ensures that the financial costs associated with a greyhound's eventual retirement are secure before their racing career even begins. At the point of a racing greyhound's registration with GBGB, the owner must pay £210 towards the GRS Bond. This sum is kept and then matched by GBGB when the greyhound enters an approved homing centre. This creates a £420 bond which will help to cover the costs of a greyhound's stay in a homing centre whilst they await their forever home.
 - As previously stated, ARC also contributes into this fund for all ARC stadia affiliated greyhounds.
 - Since the launch of the GRS in 2020, almost £6 million has been paid in matched funding to GBGB's network of over 100 approved homing centres.
 - In 2024, GBGB strengthened its follow-up procedures to check that retired greyhounds are settling well into their new placements. All greyhounds homed privately now receive multiple follow-up communications from GBGB at two, six and twelve months after welcoming their greyhound into their home.
 - To enhance the welfare of those greyhounds remaining at their trainers' residential kennels while they await homing, with input from the Greyhound Forum, GBGB developed a [Guide to Enhancing the Welfare of Retired Greyhounds in Residential Kennels](#). These greyhounds also receive visits from GBGB's Regional Regulatory Vets who have a specific responsibility to check on their welfare.
 - GBGB's regulatory remit means it has no legal powers to stop a greyhound being exported once they have retired. Nonetheless, GBGB has worked to strengthen the systems and enforcement which it is able to use to safeguard the welfare of greyhounds during exportation. In January 2025, new stakeholder guidance around the export of retired greyhounds outside of
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Great Britain was issued. This was accompanied by the introduction of a new procedure whereby owners must inform GBGB before the greyhound's movement abroad using a newly developed form and review system to ensure the necessary due diligence has been carried out regarding the ongoing care of their greyhound. Since the process began, the majority of applications have been submitted for greyhounds to retire with an existing racing owner, or a new private owner who lives abroad and GBGB has been satisfied that the required due diligence has been carried out.

- In most cases, greyhounds retiring from the sport go on to make excellent pets and can transition successfully from a kennel environment to life in a domestic setting. As part of the strategy, Dr Sarah Heath FRCVS, an RCVS and European Veterinary Specialist in Behavioural Medicine, has been providing educational opportunities about how this can best be done for national and international stakeholders within the sport of greyhound racing. GBGB already supports trainers to enlist the assistance of specialist homing centres who can offer help with these individual greyhounds, but to further this, GBGB is working with Dr Heath to develop a standardised behavioural assessment for racing greyhounds to ensure these greyhounds are given the correct support.
- As a result of these measures, licensed racing has seen the successful retirement rate improve from 88% in 2018 to 94% in 2024. This is a significant improvement particularly in the context of the current rehoming crisis affected all breeds of dog.

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 Bill is intended to prohibit greyhound racing in Wales. Under Section (1) of the Bill a person commits an offence if he/she/they '(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'.

As detailed in our answers to Q1 and Q2, the provisions of Section 1 of the Bill will inevitably put greyhound welfare at higher risk than it currently is in Wales, because it will result in the cessation of greyhound welfare safeguarding currently provided for the entirety of a greyhound's lifetime through regulation by the Greyhound Board of Great Britain.

Under Section 2 of the Bill, “Greyhound racing” means 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)’.

Section 2 of the Bill will be detrimental to greyhound welfare by increasing the distances which greyhounds have to be transported for training and racing and/or increasing the risk of injury for greyhounds.

There are currently 21 greyhound trainers licensed by GBGB based in Wales. Should the Bill be passed and greyhound racing be banned in Wales those trainers will likely maintain their premises in Wales and continue training but have to take their dogs to England to compete. This will inevitably increase the distances which greyhounds need to travel to race. Since any transportation of animals always results in some stress, however optimal the conditions under which they are transported, this will have a detrimental effect on greyhound welfare.

Training racing greyhounds on a track is an important part of teaching them to navigate a race as safely as possible and thus reduce the risk of injury. Since Section 2 not only bans greyhound racing but also bans timing or training a greyhound around a track, it will either (i) have a detrimental, transport-stress related effect on greyhound welfare by making it necessary for trainers to transport their dogs to England to reduce the risk of injury through familiarising them with running on a track before they race, and / or (ii) have a detrimental effect on greyhound welfare by increasing the risk of injury if Welsh greyhound trainers do not wish to increase the stress on their greyhounds by transporting their greyhounds for training, and are unable to train them on a track in Wales.

Section 3 of the Bill relates to Offences by bodies corporate etc. ARC does not have any comments on Section 3.

Schedule 1 of the Bill relates to Offences by bodies corporate etc. ARC does not have any comments on Schedule 1.

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?

We note that Section 9(h) of Schedule 2 of the Bill prohibits Inspectors exercising a power of entry from seizing a dog. ARC does not support the Bill and believes that the Bill will be detrimental to greyhound welfare for the reasons explained in our responses to Q1-3. However, this prohibition on Inspectors seizing a dog is to be commended in relation to protecting greyhound welfare should the Bill

(unfortunately) become law and in a situation where enforcement of the Bill were being attempted.

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?

Section 5 determines that ‘the [...] provisions of this Act (other than Sections 5 and 6) come into force on a day appointed by the Welsh Ministers in an order made by Welsh statutory instrument, but they must be brought into force on a day that is— (a) no sooner than 1 April 2027, and (b) no later than 1 April 2030’.

If The Prohibition of Greyhound Racing (Wales) Bill becomes law then as soon as it became known that the sport of greyhound racing had no future, promoters, stadia, owners, trainers and breeders would immediately exit the sport. This would cause a huge number of greyhounds to simultaneously need homing. As the British Veterinary Association (BVA) stated in its response to the Welsh Government’s consultation on the licensing of animal welfare establishments (page 63) this would have negative impacts on the welfare of huge numbers of animals. Since the announcement of the intention to ban greyhound racing in Wales the BVA has reiterated its concern about the lack of planning by Welsh Government for homing of greyhounds who will exit racing as a result of the ban (for example, <https://www.vettimes.com/news/vets/small-animal-vets/greyhound-race-ban-needs-robust-transition-bva-says-after-bill-draft>). GBGB and ARC share the concerns of the BVA and believes that the bringing into force of the provisions of this Bill, should it be enacted, will be detrimental to the welfare of greyhounds and of the wider canine population by flooding rehoming centres at a time when the number of homes being offered to dogs of all breeds in such centres is **already significantly reduced** due to the cost of living crisis. Those charities who are supporting a ban on greyhound racing in Wales and currently insisting that they will assist with homing the large number of greyhounds who would abruptly exit racing should this Bill become law are simultaneously reporting that their homing centres are already at full capacity in Wales and England (for example, <https://www.deeside.com/rspca-warns-of-dog-rehoming-crisis-in-wales/> <https://nation.cymru/feature/adopt-dont-shop-welsh-rescue-centres-facing-unprecedented-number-of-dogs-waiting-for-homes/>

<https://www.bbc.co.uk/news/articles/c930qg9xv9no>

<https://www.whtimes.co.uk/news/25442589.rspca-hertfordshire-dealing-record-number-dogs/>

In contrast to this situation at homing centres run by charities, adoptions from GBGB Greyhound Retirement Scheme centres in the first 6 months of 2025 were increased by 37% compared to the same period in 2024. At the same time, the number of greyhounds being registered with the GBGB is at an all-time low, reflecting the sport's determination to continue moving to a sustainable position where the number of greyhounds entering racing is no greater than the number to whom homes are offered upon retirement. **The Prohibition of Greyhound Racing (Wales) Bill and Section 5 in particular will be detrimental to greyhound welfare since it will disrupt the move towards a racing:homing equilibrium by dramatically and suddenly increasing the numbers of greyhounds needing homes. In so doing will cause a very large number of greyhounds to have to wait prolonged periods to find a retirement home, and possibly even to enter homing centres to begin with.** It might also reduce the number of places in rehoming centres and of private homes being offered to dogs of non-greyhound breeds.

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

The Bill completely fails to account in any way for meeting the welfare needs of greyhounds across their lifetimes, and specifically fails to account for how the welfare of the very many greyhounds who would abruptly exit racing should this Bill become law will be protected.

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)?

ARC has no view on Chapter 5 of Part 1 of the Explanatory Memorandum.

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

As explained in the answers to Q1-3 and 5, the policy intention and the Bill, which focus exclusively on banning greyhound racing, will be detrimental to greyhound welfare. Banning greyhound racing in Wales will result in the loss of the comprehensive protection of greyhound welfare across greyhounds' lifetimes which is currently provided through regulation (including effective enforcement) by the GBGB (and detailed in our responses to Q1-3).

The Bill, should it be enacted, will have an additional and significant adverse effect on greyhound welfare by flooding canine rehoming centres which (by their own admission) are already at full capacity in Wales and England with a very large number of greyhounds who would all exit racing simultaneously. This will cause a very large number of greyhounds to have to wait prolonged periods to find a retirement home and possibly even to enter homing centres to begin with. It

might also reduce the number of places in rehoming centres and of private homes being offered to dogs of non-greyhound breeds.

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?

It is the view of GBGB and ARC that the Welsh Government have not carried out the necessary collaborative working with the members of their Implementation Group for the Bill.

85 individuals are directly or indirectly employed as a result of the Valley, with the majority looking to lose their source of employment and income. These include the trainers, of which there are 21 GBGB-licence-holders based in Wales, as well as kennel hands, maintenance, camera and hospitality staff.

Detailed in the Economic Impact of [Greyhound Racing in the UK \(2022\) report](#), UK-wide owners of greyhounds contributed £24.2 million annually into the sport, which would be circa £1.27 million on an individual track basis.

This is to say nothing of the cultural, social and community benefits brought by the Valley Stadium, nor of the historic role that greyhound racing has played as a rural activity in traditionally underserved areas.

Under Cost Savings, the Welsh Government details that by banning greyhound racing, there would be a cost saving of £11,000 per year by not having to correspond with persons calling for a ban. It would be ARC and GBGB's strong contention that increased correspondence for bans on other sports and activities involving animals would likely follow a ban on greyhound racing, as animal rights groups adjusted the focus of their demands.

In contrast, if the Welsh Government were to decide that all greyhound racing in Wales in future had to be regulated by GBGB, implementing those higher welfare standards would be at no cost to the Government. As regulator for British licensed greyhound racing, GBGB has put in place and enforces a regulatory system that goes far beyond what is required under the Welfare of Racing Greyhounds Regulations 2010 which apply in England. Our regulatory and licensing regime offers a proven option for safeguarding the welfare of racing greyhounds in Wales, without any need for additional legislation or extra resource from Welsh public services.

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

ARC believes that this Bill will be extremely detrimental to greyhound welfare.

We urge the Welsh Government and Senedd to demonstrate a genuine commitment to animal welfare rather than to animal rights and to withdraw this Bill and legislate instead to safeguard animal welfare by maintaining greyhound racing as a legal activity and insisting that in future all greyhound racing in Wales be regulated by the GBGB.

Implementing higher welfare standards through such legislation would (unlike the proposed legislation to ban greyhound racing, which will anyway be detrimental to greyhound welfare) be at no cost to the Government. As regulator for British licensed greyhound racing, GBGB has put in place and enforces a regulatory system that goes far beyond what is required under the Welfare of Racing Greyhounds Regulations 2010 which apply in England. This regulatory and licensing regime offers a proven option for safeguarding the welfare of racing greyhounds in Wales, without any need for additional legislation or extra resource from Welsh public services.

Whilst the GBGB and ARC fully respects the devolved nature of animal welfare policy and legislation and the autonomy of the Welsh Government, we respectfully note here the support for optimising greyhound welfare through regulation rather than through banning greyhound racing being shown by the Westminster Government. That Government has confirmed its support for licensed greyhound racing and indicated its satisfaction with the current regulations that are in place. On 27 February 2025, the Secretary of State of Culture, Media and Sport told the House of Commons:

“We have absolutely no plans whatsoever to ban greyhound racing. We appreciate the joy it brings to many, many people in our country and the economic contribution it makes.”

This followed a statement by Daniel Zeichner MP, the then Minister of State at the Department for Environment, Food and Rural Affairs, on 9 October 2024:

“The welfare of greyhounds in England is protected by the Animal Welfare Act 2006. The 2006 Act allows action to be taken where there is evidence of cruelty to an animal or a failure to provide for that animal’s welfare needs. This includes where greyhounds are raced at greyhound racing tracks, kept at trainers’ kennels, or kept elsewhere as pets, for example.

“Further to these general provisions, specific welfare standards at all greyhound racing tracks in England are laid out in the Welfare of Racing Greyhounds Regulations 2010. Requirements in the 2010 Regulations include having a veterinary surgeon in attendance while dogs are running (with all greyhounds inspected by the vet before being allowed to run); requiring all greyhounds to be microchipped and earmarked before they can race or trial; and requiring records to be kept by the track of all dogs run or trialled at the track and any dogs injured.

“Standards in the 2010 Regulations are enforced by either the track’s local authority or the Greyhound Board of Great Britain (GBGB). The role of the GBGB as a regulator of these standards is independently scrutinised by the United Kingdom Accreditation Service (UKAS).

“In addition to its role as an industry regulator, GBGB has also undertaken a number of welfare reforms, including publishing a long term, national welfare strategy in May 2022 – ‘A Good Life for Every Greyhound’. The strategy focuses not only on reducing risks of injury but also developing and implementing new management practices to improve the welfare of greyhounds throughout their lives, including after they have finished racing. The Government is monitoring GBGB’s progress in delivering the strategy and should further measures and protections be required the Government will, of course, consider options which are targeted, effective, and proportionate.”

Reports against the short- and medium-term objectives of the GBGB’s Welfare Strategy can be found **here:** <https://gbgb-prod-assets.s3.eu-west-1.amazonaws.com/wp-content/uploads/2025/10/08140710/A-Good-Life-for-Every-Greyhound-Progress-Report-October-2025.pdf> and **here:** <https://gbgb-prod-assets.s3.eu-west-1.amazonaws.com/wp-content/uploads/2024/12/10101528/Delivering-A-Good-Life-for-Every-Greyhound-Progress-Report-Dec-2024.pdf>).
