

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros
Newid Hinsawdd a Materion Gwledig
Deputy First Minister and Cabinet Secretary for Climate
Change and Rural Affairs



Llywodraeth Cymru
Welsh Government

Peredur Owen Griffiths MS
Chair of the Finance Committee

SeneddFinance@senedd.wales

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Dear Peredur,

Thank you for your letter of 9 October regarding the Prohibition of the Greyhound Racing (Wales) Bill.

I am grateful for the opportunity to assist the Committee in its scrutiny of the financial implications of the Bill. The attached document provides the further information the Committee has requested.

As your letter to me was copied to the Culture, Communications, Welsh Language, Sport, and International Relations Committee, I am doing the same.

Yours sincerely,

Huw Irranca-Davies AS/MS

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a Materion Gwledig
Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1SN

Gohebiaeth.Huw.Irranca-Davies@llyw.cymru
Correspondence.Huw.Irranca-Davies@gov.wales

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Establishing the Costs and Benefits of the Bill

1. The Bill and Explanatory Memorandum were laid before the Senedd ahead of the Greyhound Racing Ban Implementation Group's Report and workplan, which is due this Autumn. Why have you taken this approach and how might the Implementation Group's Report impact on financial implications of the Bill?

The decision to introduce the Bill ahead of the Implementation Group's first report reflects the Welsh Government's commitment to move to a ban as soon as practicably possible, to act decisively in response to strong public and cross-party support, as evidenced in consultation responses and Senedd debate for a ban on greyhound racing.

The Bill's introduction allows for full Senedd scrutiny, while the implementation window, between April 2027 and April 2030, provides ample time for the Implementation Group to continue its work and inform the transition.

A Regulatory Impact Assessment (RIA) has been carried out and published, based on the information available to us. Through the Implementation Group and ongoing engagement with stakeholders, we continue to gather further evidence to support the ongoing assessment of the policy's impact throughout the Bill process.

Any further information made available will be assessed and will inform the potential financial impact of the ban. Both the RIA and the Integrated Impact Assessment (IIA) will be reviewed and further developed as necessary throughout the Bill's scrutiny to its passage, ensuring that any emerging considerations are appropriately addressed and reflected.

2. What role has the Greyhound Racing Ban Implementation Group played in the preparation and review of the Regulatory Impact Assessment?

A Regulatory Impact Assessment (RIA) has been carried out and published, based on the information available to us. The Implementation Group provides strategic guidance and practical advice, including on financial and socio-economic impacts. Their input will inform revisions to the RIA as the Bill progresses. Caerphilly County Borough Council and the Welsh Local Government Association (WLGA) are represented on the Implementation Group, and officials have engaged with local authority representatives in Caerphilly during the preparation of the RIA.

At present as stated in the published RIA the extent of some impacts is unknown, including on employment, the local economy and communities and industries associated to Valley. As the legislative process progresses, we hope that more detailed evidence is made available via the group, and we will continue to assess the impact of the ban.

Due to the absence of published financial accounts and limited disclosure from Valley, the full economic impact of the Bill on the business and its associates remains uncertain. However, we continue to pursue this information through the Implementation Group, direct engagement and other available sources.

Representation from Valley and SIS Media on the Implementation Group ensures that the perspectives of those directly involved in the industry are heard, and that practical insights inform the development of mitigation measures and support mechanisms.

The impact of the ban remains a key consideration, and we are actively undertaking work to seek information relating to its financial and socio-economic implications as part of our ongoing work.

3. What specific evidence have you used to estimate the financial implications of the Bill and how have you engaged with stakeholders in deriving your estimates?

To inform the initial assessment of financial implications and to set out the best estimates officials have made direct information requests to organisations, reviewed publicly available records, such as Companies House, and engaged with members of the Implementation Group to explore any relevant insights or data.

Officials have engaged directly with the local authority in Caerphilly as well as through the Implementation Group to provide indicative costs associated with any anticipated enforcement activity. This engagement was facilitated through the Local Government Partnership Scheme, which enabled early dialogue with relevant stakeholders and helped establish a baseline understanding of potential resource requirements.

The Welsh Government's cost estimates were informed by precedent from similar legislative exercises. Existing rates and resource requirements used for previous recent legislation were applied to calculate the level of staffing and materials likely to be required. This included consideration of the time and expertise needed to produce guidance, communication materials, and other supporting documentation necessary for implementation.

At present as stated in the published RIA the extent of some impacts is unknown, due to a lack of available information including on employment, the local economy and communities and industries associated to Valley.

My officials have on several occasions, requested detailed information from Valley and SIS Ltd, both via the Implementation Group and through direct engagement. This includes commercial, contractual, employment and financial data, as well as social and attendance figures, to support further assessment of the Bill's social, economic and financial impacts.

The information provided to date regarding Valley Stadium's operations, commercial arrangements and staffing remains high level.

Engagement with Valley Stadium and the Implementation group is ongoing and any information provided will inform future updates to the RIA and wider integrated impact assessments.

4. Why have you adopted a five-year appraisal period for the financial implications of the Bill?

A five-year appraisal period was adopted as it reflects the expected lifecycle of financial impact following the Bill's implementation. The primary costs associated with the Bill are one-off in nature, relating to initial setup, enforcement preparation, and the development of supporting materials. Once these systems are in place, there is no anticipated ongoing need for review of the financial implications nor significant additional expenditure.

Given that future years beyond implementation are expected to incur minimal or no costs, a five-year period was considered proportionate and sufficient to capture the relevant financial implications.

5. What are the current annual costs incurred by relevant public bodies in Wales—including law enforcement, regulatory agencies, and any other stakeholders—in monitoring, investigating, and responding to issues relating to greyhound racing activities?

There are currently no specific regulations governing greyhound racing in Wales, and as such, no direct annual costs are incurred by public bodies in monitoring or enforcing greyhound racing activities.

However, costs do arise in relation to broader animal welfare issues directly associated with greyhound racing activities, which are addressed and enforced under existing legislation such as the Animal Welfare Act 2006.

Caerphilly County Borough Council is the only authority identified to date as having incurred costs, specifically in relation to enforcing animal welfare provisions in relation to greyhound racing activities at Valley. We remain in close communication with Caerphilly through both the Welsh Local Government Association (WLGA), contact within the Implementation Group and through direct engagement between officials and local authority representatives.

We continue to engage with local authorities via the Implementation Group to gather any anticipated enforcement-related expenditure. At present, these costs are estimated to be negligible as set out in the published RIA.

The Bill is designed to be cost-neutral for enforcement bodies. No new systems are created, and existing local authority inspectors will enforce the ban.

Specific Costs Associated with the Policy Proposals

6. The RIA notes nearly two-thirds of respondents to a public consultation supported a phased ban. How has this been reflected in the Bill and your estimate of its financial implications?

A phased ban was considered in response to the recommendations made by the Final Bend report by the Petitions Committee, which highlighted the need for a

transitional approach. The majority of stakeholders in favour of greyhound racing acknowledged the need for a transition period to allow for appropriate preparation and mitigation for both the industry and to protect the welfare of greyhounds.

This has been reflected in the Bill through the proposed coming-into-force date, which provides a clear window for the industry to prepare for the ban. This transitional period also allows rehoming charities, local communities, and the Welsh Government to plan and implement measures to mitigate any potential socio-economic impacts.

In terms of financial implications, the RIA has accounted for the transitional phase. While any costs incurred during this window are expected to be minimal and one off, they will be monitored and, if necessary, mitigated through engagement with the Implementation Group and relevant stakeholders.

7. All quantified costs in the RIA relate to staff time to prepare bilingual guidance and for communicating the ban, but these do not include senior officials' oversight of the guidance or publicity material prior to their publication, or any non-staff costs. How confident are you that your estimates of the financial implications of the Bill are complete and accurate; how have you tested the reasonableness of your approach and the assumptions you have adopted in the calculations?

The RIA includes staff time for bilingual guidance and communications. While senior oversight time has not been separately quantified, it is expected to be absorbed within existing workloads and is not anticipated to materially affect the overall cost profile and is considered proportionate.

We have benchmarked our assumptions against similar activities, such as the development of guidance and communications for other Bills, to ensure our estimates are proportionate.

Given the limited scale of greyhound racing in Wales, ongoing costs are expected to be minimal. We are confident that our approach reasonably reflects the costs associated with developing guidance and communications. As no new systems or processes are required to implement the ban, the overall costs are minimal.

8. What is the estimated cost of the Greyhound Racing Ban Implementation Group and why has this not been included in the RIA?

£100k has been set aside for the establishment and administration of the Implementation Group in 2025/26.

The Implementation Group has been established to provide practical advice and guidance up to the point at which the ban comes into force. We expect the Group to remain active until that time, or until it reports that the implications of the Bill have been sufficiently mitigated to allow commencement.

While the costs incurred to date are considered sunk and are therefore correctly excluded from the current RIA, if the lead-in period extends into future years up to

2030, any additional costs will be factored into future revisions of the RIA as our understanding develops.

9. The RIA does not quantify the financial loss to the only greyhound racecourse in Wales, Valley Greyhound Stadium. You note Valley does not publish full accounts but what steps have you taken to obtain financial information about its operation, including the consequences for its contract with Sports Information Services for live streaming of racing?

My officials have, on several occasions, requested detailed information from Valley, both via the Implementation Group and through direct engagement. This includes commercial, contractual, employment and financial data, as well as social and attendance figures, to support a more comprehensive assessment of the Bill's social, economic, and financial impacts.

Engagement with Valley is ongoing and any information provided will inform future updates to the RIA and wider integrated impact assessments.

To inform the initial assessment of financial implications and to set out the best estimates officials have made direct information requests to organisations, reviewed publicly available records and data sets, such as Companies House, and engaged with members of the Implementation Group to explore any relevant insights or data,

10. Will the owner of Valley Stadium be entitled to any compensation following the ban?

Our view on the facts as we understand them is that the Bill achieves a fair and proportionate balance between the protection of the rights of those affected by the Bill and the effectiveness of the proposed ban without the need for compensation. There is no provision for compensation in the Bill.

11. What assessment have you made of the impact of the ban on those directly or indirectly employed in the industry, as well as on the wider economy?

There is currently one greyhound racing stadium in Wales, Valley. We recognise that the closure of this stadium will have economic consequences. The Bill currently includes provision for a lead in time before coming into force, no earlier than April 2027, and no later than April 2030, to help the business and the local community adjust. We're committed to working with stakeholders to manage this transition.

The RIA accompanying the draft legislation outlines our current understanding of the potential impacts of the proposed ban. It acknowledges the limitations of existing data and identifies areas where further analysis will be undertaken if additional information becomes available.

As the legislative process progresses, we are actively seeking more detailed evidence to support a robust assessment of these socio-economic implications. Understanding the impact of the ban is a key priority.

Through the Implementation Group and ongoing engagement with stakeholders, we continue to seek further evidence to support the ongoing assessment of the impact throughout the Bill process.

12. What consideration have you made of the approach taken to estimate the financial implications of the Bill in Scotland?

The Scottish Animal Welfare Committee's report and the Scottish Bill have informed Wales's approach. Differences in assumptions reflect Wales evidence base, stakeholder engagement and recent legislative exercises.

There are key contextual differences, which mean that direct comparisons in enforcement costs or legal processes are not always applicable. Scotland's justice and enforcement systems also differ from those in Wales, including their approach to penalties and enforcement, which further limits comparability. The scale of greyhound racing in Wales is different to that in Scotland. Wales has an active commercial greyhound track, whereas Scotland has only one independent track that is not currently operating. In Wales, the anticipated financial and operational impacts, particularly in terms of enforcement, are proportionately lower. Our estimates reflect this context, and our costs are expected to be minimal.

13. While noting the Bills differ, the Financial Memorandum for the Bill in Scotland includes a range of costs for rehoming retired greyhounds (an estimate of which you say would be "speculative") and for prosecuting the small number of cases expected each year (you assume the cost of enforcement would be zero). On the basis of what evidence have you made different assumptions for these costs?

It is recognised that there may be some short-term costs associated with rehoming retired greyhounds as a direct consequence of the ban. Welfare groups are actively involved in planning to mitigate these impacts independently and through their representation on the Implementation Group. We will work with animal welfare charities through the Implementation Group to minimise negative impacts.

The Bill is expected to come into force between April 2027 and 2030. The implementation of the prohibition on greyhound racing will be carefully managed to ensure a smooth transition and to mitigate the impact on those affected including rehoming organisations.

We expect breaches of the provisions of the Bill to be rare. The sole active track in Wales is licensed by the Greyhound Board of Great Britain (GBGB), and the industry operates to professional standards. Compliance with the prohibition is likely to be high, particularly given the reputational risks associated with non-compliance.

On this basis and in our discussions with the local authority, we have expected that the cost of enforcement will be minimal and are proportionate to the limited scale of greyhound racing in Wales.

The impact on the justice system has been considered, and a Justice System Impact Identification Form was submitted to the Ministry of Justice. The Lady Chief Justice's Department has also been consulted on the anticipated impact the Bill will have on the justice system. The estimated impact on the justice system is expected to be minimal.

Engagement with the Ministry of Justice is ongoing. Once this is complete, I intend to publish the JSII, and I will reflect the updated position in the Explanatory Memorandum ahead of Stage 3.

Methodology and approach to quantifying the benefits of the change.

14. You say the “prohibition is expected to deliver a range of social, cultural, and animal welfare benefits” but you quantify only the cost-saving from a reduction in correspondence from individuals and stakeholders calling for a ban on greyhound racing. What benefits are likely to arise from the Bill and why have you not quantified them?

While only administrative savings are quantified, the Bill is expected to deliver broader social, cultural, and animal welfare benefits.

Currently, there is no available evidence to support a robust, quantified assessment of the societal benefits of improving animal welfare, and obtaining such evidence would be disproportionately costly. However, it is widely recognised that society places a positive value on animal welfare, as reflected in public support for animal welfare charities, demand for high-welfare food products, and preference for cruelty-free goods.

Greyhound racing is seen by many as an outdated practice, prohibiting greyhound racing can instil values of kindness and responsibility in young people, shaping a future where animals are treated with dignity, setting a positive example for future generations.

The [Animal Welfare Plan for Wales 2021-26](#) sets out our ambition for animal welfare in Wales to be recognised for its exemplary standards, its adoption and sharing of best practice, its engagement with key stakeholders, its development of effective, supportive and sustainable mechanisms for enforcement, its contribution to research, and its championing of education and responsible ownership for the benefit of our own and future generations.

A fundamental consideration of our plan is to promote education and awareness amongst everyone involved in keeping animals. This will not only help provide a good quality of life for animals in Wales, but also do much to ensure future generations of animal keepers will understand how applying best practice makes a positive difference.

There has been increasing public concern over the ethical treatment of animals, demonstrating that government policy is responsive to evolving societal values. These are difficult to monetise but are central to the policy rationale.

15. What methodology have you used to support the stated environmental benefits arising from the Bill?

Environmental benefits are not quantified but are expected to arise from reduced activity at the stadium and potential repurposing of the site.

Our assessment that informed the RIA published alongside the Bill including the assessment of environmental benefits, this considered the potential reduction in travel for greyhound trainers, the implications of increased travel distances if racing were relocated, the current and potential future use of the land on which the site is located, and comparative analysis of the repurposing of other recently closed stadiums, including any limitations encountered in those transitions.

The Bill does not propose or prescribe the future use of any track or stadia, decisions regarding their use rest with the owner and the local planning authority. However, the future of the Valley remains a consideration, noting that its use as a greyhound racing track will no longer be feasible.

The Implementation Group will offer practical advice and guidance, ensuring that the impacts of the ban are fully considered, including the welfare of greyhounds, and the effects on local communities and the local economy.

We have undertaken a [biodiversity impact assessment](#) which has been published.

16. What engagement have you had with Valley Greyhounds Limited about the future use of the stadium or land for alternative uses?

Valley is represented on the Implementation Group. While the Bill does not prescribe future use, repurposing options may be considered in collaboration with local authorities. Any planning considerations rest with the owner and local planning authority.

Relevant advice and repurposing options may be explored by the Implementation Group, on which the Valley and local authority are represented.

Post-Implementation Review

17. Your post-implementation review says the Bill will be reviewed no later than five years after it has come into force. However, the RIA notes some benefits may be long-term in nature. What factors will you use to determine whether the Bill has been successful?

While the Bill does not include a statutory requirement for post-implementation review and does not establish new systems or reporting duties that would necessitate such a provision, the Welsh Government is committed to good practice in policy evaluation. A review will be undertaken within five years of commencement, with evaluation activity beginning from 12 months after the Bill comes into force.

The review will aim to measure whether the policy objectives are being met and to identify any unintended consequences in line with the Welsh Government's principles for research and evaluation.

Success and impact will be measured through a combination of qualitative and quantitative indicators, including enforcement activities and outcomes, stakeholder feedback, welfare outcomes and the reduction in harm to greyhounds, and socio-economic impacts.

The implementation of the Bill will form part of the Welsh Government's wider programme of work on animal welfare and supports the Animal Welfare Plan for Wales 2021–26. As these plans are evaluated and renewed, the implementation and impact of the Bill will be considered within that broader context too, ensuring that success is measured not only in isolation but as part of a wider assessment of animal welfare regulation and outcomes further strengthening evaluation's scope and potential to deliver meaningful, long-term insights.

18. How has the cost of the post implementation review been reflected in the RIA?

The cost of the post-implementation review has not been separately quantified, as it is expected to be minimal. This reflects the limited scale of the current greyhound racing industry in Wales and the concentrated nature of the Bill's impacts. As such, the review will be proportionate and delivered within existing Welsh Government resources. Furthermore, the review will align with and contribute to the broader evaluation of ongoing animal welfare work, as set out in the Animal Welfare Plan for Wales 2021–26. As that plan is renewed and revised, the implementation of the Bill will be considered within this wider context, ensuring the Bill's evaluation contributes meaningfully to a broader understanding of animal welfare outcomes and strengthens the overall evidence base for future policy development.