

Consultation on proposals for welfare of racing greyhounds regulations

Comments by Advocates for Animals July 2009

Advocates for Animals welcomes the opportunity to respond to DEFRA's consultation on proposals for welfare of racing greyhounds regulations. Although we would ultimately like to see an end to this exploitation of animals, until that time we welcome measures to improve the welfare of the animals involved.

We have many concerns surrounding the greyhound racing industry, especially relating to the supply of dogs, their welfare during their racing 'careers', and the thousands of dogs that are retired every year. For a proportion of these dogs, their fate is simply unknown and there have been numerous cases of such dogs being abandoned or killed, sometimes by extremely cruel methods.

We hope that the new regulations will make a real improvement to the welfare of greyhounds and that the racing industry will take responsibility and accountability for caring for all of the dogs bred, trialled, raced and retired.

Q1. Do you agree with introducing regulations setting minimum animal welfare standards for all tracks in England, or could this be achieved through a non-regulatory solution?

We agree with the introduction of regulations setting minimum animal welfare standards for all tracks in England. We would like to see the regulations extended to breeders', trainers' and owners' premises – where most of a greyhound's life is spent.

We do not believe that the setting of minimum animal welfare standards could be achieved through a non-regulatory solution.

Q2. Subject to the exemption for tracks belonging to a body that has obtained UKAS accreditation - do you agree that there should be a licensing scheme for greyhound tracks in England?

We believe that there should be a licensing scheme for *all* greyhound tracks in England. Standards and sanctions should be consistent for all animals and all locations, as discussed in our response to Question 3 below.

Q3. Do you agree that if a body applies, at a minimum, those standards required under these regulations at the tracks which it regulates and is accredited by UKAS then any tracks that are affiliated to it should be exempt from the proposed licensing scheme?

We disagree with any exemption from the proposed licensing scheme.

We believe that there should be one single regulatory authority to establish and enforce welfare regulations, as recommended by Lord Donoughue of Ashton in his 2007 report¹. This authority should be publicly accountable and competent. Having one main body will ensure that standards are the same across the country. Such an authority, we believe, should also hold information records of all greyhounds in the racing industry, from birth to death.

Our main concern with the self regulation of the industry is that to date, it has been extremely ineffective, with unregulated breeding and the illegal disposal of dogs common. In view of the longstanding and serious concerns about the welfare of greyhounds used for reasons, we believe that all tracks require to be licensed, without exception. This would ensure that breaches of animal welfare can be quickly addressed and the sanctions provided by the Animal Welfare Act 2006 can be applied. According to the Explanatory Note for the draft SI, a person who operates a greyhound racing track without a licence commits an offence under s.13(6) of the Act. We assume that this is not intended to apply to a track regulated by a UKAS-accredited body, but we suggest that to make it do so would be simpler, clearer and more likely to ensure consistent animal welfare standards.

Q4. Do you agree that these licensing conditions should only apply where greyhounds are being raced or trialed?

We disagree that these licensing conditions should only apply where greyhounds are being raced or trialed and would like to see the conditions extended to any greyhound activity associated with the industry. We believe this to be imperative in improving welfare conditions for greyhounds.

For instance, a report by the Associate Parliamentary Group for Animal Welfare (APGAW) in 2007ⁱⁱ found that the greyhound racing industry produces a surplus of at least 13,500 dogs per year (this includes dogs bred for racing but fail to make it to the track, and those that retire from the industry). The report stated that around 5,000 of these unwanted dogs are rehomed, 3,000 kept as pets and 750 returned to Ireland, leaving approximately 4,500 dogs unaccounted for – many of which are believed to be killed. This figure however does not take account of the dogs surplus to independent racing and so realistically the figure is likely to be much greater. Greyhounds and their welfare must be accounted for, from birth to death.

In his 2007 report, Lord Donoughue stated that “*those that wish to be involved in the breeding, owning, training and racing of greyhounds must accept ... that the public expects the sport to be accountable, both in terms of the integrity of the racing itself and the welfare of the greyhounds involved*”. To achieve this, we believe that licence conditions must be extended to any activity associated with the industry, in particular the ownership and training of racing greyhounds.

Q5. Are the definitions of racing and trialing appropriate?

We believe the definitions of racing and trialing are appropriate.

Q6. Do you agree that there should be a veterinarian present at all race meetings and trials?

We agree that a veterinarian should be present at all race meetings and trials. Given the nature of the sport, greyhounds are prone to injuries and frequently require immediate veterinary treatment.

We do however believe that this appointment must be independent. In its written submission to the APGAW inquiry into welfare issues surrounding racing greyhounds in England, the Society of Greyhound Veterinarians noted that such independent appointments would permit veterinary work without ‘*fear or favour*’ⁱⁱⁱ.

Further, the proposed conditions of the licence as in Annex D state: “*It is recommended that the veterinary surgeon is present until the last dog has fully recovered from the last race or trial and it is expected that the veterinary surgeon would not leave the racetrack until the last greyhound that he/she has been attending to has left the racetrack*”. Although we fully

support this condition, it is only a *recommendation* and so we suggest that this should be a *requirement* which would fall in line with the proposed Regulations to set minimum welfare standards for all greyhound racing tracks.

Q7. Do you agree that the veterinarian does not need any specialist qualifications/training other than being a RCVS registered practising vet?

As we understand, the Royal College of Veterinary Surgeons (RCVS) does not currently recognise greyhound practice as a speciality. However, vets who attend horse race courses are required to have postgraduate training as well as mandatory mid-career training. We believe that the RCVS should recognise greyhound practice as a legitimate specialisation and offer specific training in this field. Once this is in place, we would like to see the requirement that veterinarians working at greyhound racing tracks must have such specialist training.

Q8. Is the list of desirable qualifications/additional training contained in the draft guidance attached at Annex D suitable? Are there any other qualifications/training that would be desirable?

We support the list of desirable qualifications/additional training contained in the draft guidance attached at Annex D until a specialisation is provided by the RCVS.

Q9. Do you agree that the veterinarian must examine each greyhound prior to a race or trial?

We firmly support a veterinary examination of each greyhound prior to a race or trial.

We also believe each dog should be examined after a race in order to detect any less obvious injuries or potential health problems.

Injuries to greyhounds can be caused by a number of factors such as the dimensions of the track, the nature of the running surface, the weather and the dogs themselves and so it is vital that such injuries are identified as soon as possible to ensure the health and welfare of a greyhound is not compromised.

We would also like to see drug testing incorporated into veterinary examinations.

Q10. Do you agree that a register of veterinarian attendance must be kept at the track to demonstrate that a veterinarian has been in attendance and that this register must be kept for at least 3 years?

We support the proposal for a register of veterinarian attendance to be kept at the track to demonstrate that a veterinarian has been in attendance and that this register must be kept for at least 3 years. We would also like for these records to be made publicly available.

Q11. Do you agree that a veterinarian should have access to suitable facilities?

We support the conditions for facilities listed in paragraph 2 of Schedule 1.

Q12. Are the facilities as described here and in Schedule 1 – paragraph 2 of the draft Statutory Instrument attached at Annex C suitable?

We believe that the facilities described in paragraph 2 of Schedule 1 are suitable. However, the availability of air conditioning, for use on hot or sunny days or when a greyhound has

become overheated before, during or after a race, we believe should also be included as a condition for the veterinary facility.

Q13. Should any permanent room be for the sole use of the veterinarian – including any time when a race or trial is not being undertaken? If you are replying on behalf of a greyhound track, would this require you to build such a room?

We believe that any permanent room should be for the sole use of the veterinarian.

Q14. Do you agree that tracks should provide ventilated kennelling for at least 20% of greyhounds that race? If a different figure is required what evidence is there to support this figure?

We would like to see ventilated kennelling provided for *all* greyhounds that race, or that are intended to race but may not be able to after a veterinary examination, for example.

DEFRA recognises that dogs should not be kept in vehicles between races, however, if nowhere else is available to house the greyhounds temporarily, irresponsible owners may revert to keeping their dogs in cars. Only this month has the RSPCA again issued pleas not to leave dogs in cars, especially so during the summer months, following the death of two dogs in Nottinghamshire^{iv}.

Q15. Are the standards proposed here and in Schedule 1 – paragraph 3 of the draft Statutory Instrument attached at Annex C for kennels appropriate?

We believe the standards proposed in paragraph 3 of Schedule 1 are appropriate, as far as they go. However it is imperative that dogs are also given access to food and water when in kennels.

Q16. Should there be a 12 month interval before the requirement to provide kennels applies? If you are replying on behalf of a greyhound track, will this condition require you to build such kennels?

We would like to see requirements for providing kennels be acted on as soon as possible but understand that this will involve construction work for those kennels that currently do not have such facilities and that allowing 12 months to do so is appropriate.

Q17. Should identification by both microchip and tattoo be required or is microchipping alone sufficient?

We support DEFRA's proposal to make microchipping compulsory as a means of dog identification as set out in Condition 4, but strongly oppose the proposal for earmark tattooing.

We believe microchipping as a form of identification is sufficient on its own. It is a relatively pain-free and quick procedure, and a much more secure form of identification than tattooing.

Tattooing involves damaging an animal's skin in order to produce a permanent mark on its body. However, abandoned greyhounds are often found with their ears cut off making it impossible to trace the dog to an individual owner. Such a case was reported earlier this year by the BBC; a pregnant female greyhound found in Bristol with her ears cut off to conceal the owners identify^v. A report by APGAW in 2007^{vi} found that nearly 5,000 greyhounds in England are unaccounted for each year. These dogs are presumed to be killed by the age of three or four when they are of no further use in the racing industry.

A key recommendation from Advocates for Animals' 2006 report: 'Painful Reality: Why painful mutilations of animals must be reviewed' was the prohibition of tattooing and its replacement with microchipping^{vii}.

Q18. Do you agree that only databases which reach the standards set in Schedule 1, Part 2 of the draft Statutory Instrument attached at Annex C are appropriate databases for racing greyhounds to be registered on?

We believe that the standards set in Schedule 1, Part 2 of the draft Statutory Instrument could be improved to allow the tracking of greyhounds from birth to death.

Q19. Do you agree that track managers should be responsible for ensuring that only greyhounds that are appropriately identified and registered are racing or trialling at their track?

We agree that it is the responsibility of track managers to ensure that only greyhounds that are appropriately identified, with a microchip, and registered are racing or trialling at their track.

Q20. Are the details to be recorded – as described in paragraph 5 of Schedule 1 of the draft Statutory Instrument and above - appropriate? Are there any other details that should be recorded?

We agree that the details to be recorded, as described in paragraph 5 of Schedule 1 of the draft Statutory Instrument, are generally appropriate but wish to see the 'number on the tattoo' omitted and microchipping the sole form of identification permitted, as detailed in our response to question 17.

Q21. Do you agree that 5 years is an appropriate length of time for records to be kept?

We agree that 5 years is an appropriate length of time for records to be kept.

Q22. Should both the owner and the trainer of a greyhound be required to produce identification the first time a greyhound runs at a track?

We believe that both the owner and the trainer of a greyhound be required to produce identification the first time a greyhound runs at a track.

Q23. Do you agree that tracks should be required to keep injury records?

We strongly support the requirement for tracks to keep injury records.

The proposed guidance notes at Annex D include a recommendation for injury records to be regularly reviewed and for action to be taken by the veterinary surgeon and the track manager if injury rates should increase. We recommend that this should be included as part of Condition 6.

Q24. Are the details to be recorded – as described in paragraph 6 of Schedule 1 of the draft Statutory Instrument and above - appropriate? Are there any other details that should be recorded?

We believe the details to be recorded listed in Condition 6 are appropriate. However, the date and time of injury should also be recorded. In order to increase the transparency of the industry, such information should also be made publicly available.

Q25. Do you agree that 10 years is an appropriate length of time for injury records to be kept?

We agree that 10 years is an appropriate length of time for injury records to be kept.

Q26. Do you agree that the suggested costs and benefits set out in the Impact Assessment are a reasonable estimate of the likely costs and benefits? If not, can you provide evidence of what any likely costs and benefits should be?

No comment.

Q27. Does the estimated cost of building a new set of kennels seem reasonable? If not, can you provide evidence of what any likely costs and benefits should be?

No comment.

Q28. Does the estimated cost of a local authority licence seem reasonable? If not, can you provide evidence of what the likely costs would be?

No comment.

Q29. Further to any questions on the draft Statutory Instrument already asked in this consultation, do you have any further comments on the draft Statutory Instrument attached at Annex C?

We believe that the scope of the draft Statutory Instrument does not cover a wide enough arena that relates to greyhounds and their welfare during their racing career.

A greyhound spends only 10% of its life at a racing track and 90% of its time away from the track. Responsibility and accountability must be taken for the greyhounds that pass through the hands of breeders, owners and trainers, and when greyhounds retire, not just when they race. If the traceability of all greyhounds, from birth to death, could be addressed this should improve many of the current welfare concerns surrounding the industry.

Q30. Do you have any comments on the draft guidance attached at Annex D? Is the guidance detailed enough or would it be helpful if the guidance provided a more detailed explanation of all the requirements contained in the regulations?

We would like the guidance provided to be more detailed, as suggested in our answers to previous questions.

Advocates for Animals

10 Queensferry Street, Edinburgh, EH2 4PG, Scotland, UK

Tel: +44 (0) 131 225 6039

Fax: +44 (0) 131 220 6377

www.advocatesforanimals.org

22 July 2009

ⁱ Independent review of the greyhound industry in Great Britain. Lord Donoughue. 2007

ⁱⁱ The welfare of greyhounds. The Associate Parliamentary Group for Animal Welfare (APGAW). 2007

ⁱⁱⁱ Written submission to APGAW inquiry into welfare issues surrounding racing greyhounds in England. Society of Greyhound Veterinarians. 2007

^{iv} <http://www.guardian.co.uk/uk/2009/jul/02/police-dogs-killed-heatwave>

^v <http://news.bbc.co.uk/1/hi/england/bristol/7937809.stm>

^{vi} The welfare of greyhounds. The Associate Parliamentary Group for Animal Welfare (APGAW). 2007

^{vii} Painful Reality: Why painful mutilations of animals must be reviewed. Advocates for Animals. 2006