December 2015

BVA AND BSAVA RESPONSE TO DEFRA CONSULTATION ON THE WELFARE OF RACING GREYHOUNDS REGULATIONS 2010

Introduction and background

1. The British Veterinary Association (BVA) and British Small Animal Veterinary Association (BSAVA) welcome the opportunity to contribute to Defra’s consultation on the initial findings of the review of the Welfare of Racing Greyhounds Regulations 2010.

2. BVA is the national representative body for the veterinary profession in the United Kingdom and has over 15,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

3. BSAVA is the largest specialist division of the BVA and of the veterinary profession. It represents over 10,000 members, the majority of whom are in general practice and have an interest in the health and welfare of small animals, namely dogs and cats.

4. This response was put together with particular input from BVA’s Ethics and Welfare Group.

General comments

5. We recognise the difference made to animal health and welfare delivered by the Welfare of Racing Greyhounds Regulations, such as the requirement for vets to be present during racing. However there are a number of areas which the regulations do not touch and so their ability to impact dog welfare is limited; in particular the gaps associated with breeders and trainers working in the independent sector. While these dogs are protected under the Animal Welfare Act it would be preferable for the regulations to be expanded to oversee the welfare of these dogs too.

6. We therefore consider that there are a number areas where the regulations could be improved. In particular we wish to highlight our key concerns about the racing greyhound regulatory framework from a veterinary perspective. These include ensuring the independence of the track vets, the need for more effective monitoring for injuries, reducing the number of greyhounds euthanased each year, and the need for greyhound welfare controls outside the track environment.

Responses to the consultation questions

- **Questions 1 and 2 - veterinary attendance at all race meetings and trials with pre-running checks**

7. We would suggest that the presence of a veterinary surgeon at all greyhound race meetings and trials can only be beneficial in terms of dog health and welfare. The introduction of this
requirement has had a positive impact on independent greyhound tracks in particular, where prior to the introduction of the Regulations there was no requirement for a veterinarian to be in attendance. Having a vet in situ also means that first aid, pain relief or euthanasia can be promptly provided.

8. We therefore consider that it should remain a legal requirement for a vet to attend all race meetings and trials and for the vet to inspect greyhounds to check they are fit to compete. It may be useful for veterinary inspections to also take place following the race or trial to help identify and treat any injuries.

- **Question 3**: content of the veterinary inspection prior to any race, trial or sales trial

9. The content of the veterinary inspection prior to any race, trial or sales trial should be consistent across all tracks. We would encourage Defra to engage with the veterinary profession to achieve this.

- **Questions 4 and 5**: the provision of veterinary facilities

10. We would expect the provision of veterinary facilities to have had a positive impact on greyhound welfare, given the knowledge and experience veterinary surgeons can offer in terms of protecting and improving animal welfare. We would refer Defra to the relevant organisations representing specialist greyhound vets such as our specialist division the Society of Greyhound Veterinarians, for specific evidence.

11. We consider the description of the veterinary facilities to be provided is satisfactory. Although we would suggest that the vets’ room at each track should be fitted with a closed circuit television system to allow the veterinary surgeon on duty to watch races. This would allow the track vet to identify any greyhound which became injured while competing so that treatment could be provided without delay. It would also help to identify areas of the track where problems tend to recur and indicate where some attention to the track surface might be necessary.

- **Question 6**: do track vets have sufficient authority to ensure any ruling they make, with regard to whether a greyhound is fit to run, is carried out?

12. We note that the existing licence condition requires the track operator to ‘remove from a race, trial or sales trial any greyhound which the attending veterinary surgeon has ruled unfit to run.’

13. According to the RCVS Code of Professional Conduct, veterinary surgeons are required to work ‘within their own area of competence’ and therefore will need appropriate training to undertake this work. When they become a member of RCVS, and in exchange for the right to practise veterinary surgery in the UK, every veterinary surgeon makes the following declaration: “I will pursue the work of my profession with integrity and accept my responsibilities to the public, my clients, the profession and the Royal College of Veterinary Surgeons, and that, ABOVE ALL, my constant endeavour will be to ensure the health and welfare of animals committed to my care.”. Therefore veterinary surgeons are required to commit to protecting the health and welfare of animals as well as accepting their other
responsibilities and are answerable to RCVS should they be judged not to have met these standards.

14. It is essential that the track management respect the authority which RCVS and the Regulation invest in the vet, and that trainers and management must accept that the vet's decision is final, as to whether a dog can run.

15. If this question relates to concerns about veterinary integrity then that would be a matter for RCVS to comment upon.

16. In order to help ensure confidence in the authority of vets and ensure that they are unbiased independent, we consider it’s important for track vets to be financially and contractually independent of the operator of the stadium. The veterinary practice chosen by the operator should be contracted via the regulatory body and paid by it from a central fund, which the operator contributes to. This would then allow the track vet to make decisions that are in the best interests of greyhound welfare.

- **Question 7:** should the track vet obtain specialist racing greyhound training in order for them to operate as a track vet?

17. Care should be taken with the use of the term “specialist” as this has a very specific meaning in terms of veterinary qualifications and experience.

18. Any veterinary surgeon should be capable of assessing the fitness of a dog to compete. However we recognise that a knowledge of injuries commonly found in racing greyhounds would enhance the service a veterinary surgeon may provide. Whilst we acknowledge that regulation may not be essential here, the government and the greyhound racing industry should encourage vets working at greyhound tracks to enhance their knowledge of the physiology of the greyhound via Continuing Professional Development etc.

19. As part of this, we would like to see a requirement for vets to attend training within a set timeframe and complete refresher training on a regular and specified basis thereafter. Training for greyhound vets should aim to enhance their knowledge of the breed, greyhound physiology and the range of conditions and injuries that it may sustain as a racing animal. It would also be helpful for vets to have some knowledge of the rules, regulations and procedures around the greyhound racing industry, so they are aware of how to take samples for dope testing and what would disqualify a dog from running, as well as the correct procedure to follow. This would help ensure a minimum standard of knowledge across all vets and better equip vets with the knowledge to safeguard greyhound welfare.

20. Lord Donoughue’s [Independent Review of the Greyhound Industry in Great Britain](#) (2007) made a number of proposals in relation to the role of veterinary surgeons at greyhound tracks, including training and proven experience of working at greyhound races. It is understood that a number of these proposals have yet to be implemented.
Questions 8-10: Provision of kennelling for dogs that race or trial at the track

21. As a transition measure, the Regulations require the provision of kennels for at least 20% of the total number of greyhounds present at the track for racing or trialling, to allow independent tracks to spread the cost of building kennels over a number of years. However now the Regulations have been in place for five years, tracks should be obliged to provide a kennel for every greyhound at the track within a reasonable timescale.

22. We are not in a position to comment in detail on the general quality of the kennelling provided at the tracks, though we are not aware of significant concerns about the standards set out in the regulation. We would simply state that kennels at both tracks and trainers' premises should be independently inspected to ensure they meet the standards set out in the regulation and comply with the Animal Welfare Act.

Question 11: Which of three options highlighted in this consultation for addressing welfare standards at trainer’s kennels do you believe will best secure acceptable welfare standards?

a. Option 1: Continue to rely on the existing animal welfare and cruelty offences provided in the Animal Welfare Act 2006
b. Option 2: GBGB to work through the British Standards Institute (BSI) and with relevant stakeholders to develop a Publicly Available Specification (PAS) for trainers’ kennels
c. Option 3: Amend the scope of the current Welfare of Racing Greyhounds Regulations 2010 to include trainers’ kennels. New licensing conditions could be developed

23. We support option 3, since it is likely to deliver the highest welfare standards, which, in line with our response to Questions 8 – 10 and the paragraph below, should apply to all types of premises. Government could then work with veterinary, animal welfare organisations and industry to develop valid welfare standards.

24. The Welfare of Racing Greyhounds Regulations 2010 cover the welfare of greyhounds while they are in kennels at the track and the Greyhound Board of Great Britain inspects trainer’s residential kennels. However the kennels of greyhound trainers who only race in the independent sector and of greyhound breeders remain unregulated. Since a racing greyhound spends much of its life in and around its trainer’s kennels, the terms of the Regulations should be expanded to include kennels of these types.

Questions 12-15 – Identification of greyhounds

25. As stated in the consultation document, the Microchipping of Dogs (England) Regulations 2015 will require all dogs in England to be permanently microchipped from 6 April 2016, so this will address the issue of traceability of greyhounds. We would agree that compulsory microchipping should help to improve greyhound welfare, since it allows accurate records to be kept to keep track of each dog’s racing history and any injuries.

26. We suggest that it would make sense that the greyhound regulations should reflect – and require compliance with - the microchip and microchip database requirements set out in the Microchipping of Dogs (England) Regulations 2015.
27. However, we note that microchipping regulations and current databases were not developed specifically for the purpose of improving the traceability of greyhounds (including retired greyhounds), but primarily to identify a dog and to return it to its owner.

28. We do not consider it is really necessary for racing greyhounds to be tattooed as well as microchipped. We note that the AWF/FRAME/RSPCA/UFAW working group report on refining dog husbandry and care (2004) stated that ‘since it is impossible to tattoo painlessly, and because tattoos can be difficult to read on pigmented skin, tattooing is being phased out in preference to microchipping’.

29. To aid the enforcement of the microchipping and traceability requirements, there should be easy access available for regulators at each greyhound track to microchip readers and the microchip database.

- **Question 16:** Importance for welfare purposes for tracks to keep records of dogs that race or trial at the track?

30. We agree that it is important that it should remain a legal requirement for tracks to keep records of dogs because accurate records underpin measures to improve greyhound welfare and reduce injuries.

- **Questions 17-20:** Recording, monitoring and publishing injury records

31. The Regulations currently require the attending veterinary surgeon to keep detailed records of every incident in which a greyhound is injured during racing. The GBGB has accumulated a substantial database of greyhound injuries and there are concerns that this data is not easily accessible and that too little use is made of it, in part because of issues surrounding the commercial confidentiality of data pertaining to individual tracks. Proper statistical analysis of this information would help to identify factors contributing to the occurrence of different types of injuries.

32. Therefore we would suggest that the regulations should:

- Require the attending veterinary surgeon to add injury data to a central database within 24 hours of when the injury occurred - this would allow patterns of related injuries track to be swiftly identified, remedial action to be promptly taken and bring greyhound racing in line with horseracing
- Protect all racing greyhounds more effectively whilst they are off the track – a key part of that is central recording of injuries *between* competitions and during training
- Specify that meaningful use by independent analysts should be made of the injury data collected by the attending veterinary surgeon, so that comparisons can be made between tracks each year to monitor the effectiveness of measures designed to reduce injury
- Make provision for the veterinary surgeon on duty to be able to watch races in detail via Closed Circuit Television - this would help to quickly identify any injured greyhound and problem areas of the track where track surface may need attention

33. We consider it is essential for such records to be kept. Without them it would be very difficult for a track to identify injury trends and introduce appropriate and effective remedial actions.
34. Regarding question 20 and GBGB publishing injury and euthanasia figures, we view this as a positive step that should improve transparency. However we are concerned the agreement would not cover the non-GBGB regulated sector of the industry, nor would it be binding and the resulting data would not be independently audited.

35. When focusing on injuries, we would suggest that the design and maintenance of the running surface on which the greyhounds compete also has a significant impact on the incidence of injury during racing and this should be recognised in the Regulations. Therefore the track operator should be required to monitor the condition of the track surface and carry out routine maintenance of the surface before racing begins and between races.

36. Recording, collation and meaningful assessment of data about the effect of track surfaces and design (e.g. circular vs straight) is very important to improving greyhound welfare and deciding whether to use different more welfare friendly surfaces. The Regulations should also include recommendations regarding the training of track maintenance staff.

37. **Question 21**: GBGB to publish, from 2018, summary statistics for the number of dogs that leave the sport each year

38. The publication of annual statistics about the number of dogs leaving racing would be useful to help identify trends and problems within the industry. We would suggest that in order to make these statistics more effective and useful, they should include the reason each dog left racing.

39. We would also like to highlight that the euthanasia of healthy greyhounds no longer required for racing is currently a significant ethical issue within the UK greyhound industry. Despite the work of greyhound charities there are too many greyhounds still being euthanased at the end of their racing careers. Euthanasia may of course be the only option for a small number of greyhounds with certain types of chronic injuries or behaviour problems.

40. Humane euthanasia properly carried out by a vet is not a welfare issue from the animal’s point of view. Unfortunately in some cases, humane euthanasia might be better for the greyhounds from a welfare point of view than less welfare friendly alternatives. However, sometimes euthanasia is used as a convenient means of dealing with greyhounds that are considered too old or too slow to continue racing.

41. There are interesting analogies here with the problems that horse welfare charities have recently been facing, when the horse abandonment crisis has meant that rescue centres have been full, leading to concerns that the charities will be forced into the position of euthanasing healthy or treatable animals.

42. We are therefore calling for an improvement in re-homing rates for retired greyhounds, and indeed those numerous dogs which never actually race to start with.
Question 22: Retaining and updating Defra’s Guidance for Independent Track Operators

43. The Gfk research illustrated the value placed on Defra’s guidance, which helps track operators to meet the legally requirements. So we believe it should be updated and then promoted.

Question 23: Enforcement of welfare standards required by the Regulations at (a) GBGB regulated tracks and (b) local authority licensed tracks

44. GBGB’s retention of its UKAS accreditation indicates its enforcement has reached a satisfactory standard but there is always room for improvement.

45. We are not in a position to be able to comment in detail on the enforcement of welfare standards at local authority licensed tracks. However, since local authorities regulate such a small number of tracks, there is a risk that local authorities may not have staff with experience of regulating greyhound tracks, plus cuts to local authority budgets present another challenge for this service.

46. The proposals set out in our responses above, including calls for more and better kennelling, consistent veterinary pre and post-race checks and analysis of centrally recorded injury data, should all help to raise welfare standards.