

Agenda – Culture, Communications, Welsh Language, Sport, and International Relations Committee

Meeting Venue:

Committee Room 3, Senedd

Meeting date: 6 November 2025

Meeting time: 09.45

For further information contact:

Richard Thomas

Committee Clerk

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Hybrid

Private pre-meeting

09:30–09:45

At its meeting on 23 October 2025, the Committee agreed a motion under Standing Order 17.42(ix) to exclude the public from the start of today's meeting.

1 Forward work programme for the remainder of autumn term 2025 and spring term 2026

09:45–10:00

(Pages 1 – 6)

Attached Documents:

Forward Work Programme – Autumn 25 – Spring 26

2 Consideration of draft correspondence

10:00–10:05

(Pages 7 – 8)

Attached Documents:

Draft letter to the Department for Culture, Media and Sport on Senedd involvement in the appointment of the Chair of S4C

3 Consideration of letter from the Llywydd seeking views on the practice of publishing pre-introduction versions of Bills

10:05–10:10

(Pages 9 – 10)



Attached Documents:

Letter from the Llywydd seeking views on the practice of publishing pre-introduction versions of Bills

4 Prohibition of Greyhound Racing (Wales) Bill: Citizen engagement survey findings

10:10–10:20

(Pages 11 – 38)

Attached Documents:

Citizen engagement findings report

Break

10:20–10:30

Public

5 Introduction, apologies and substitutions

10:30

6 Prohibition of Greyhound Racing (Wales) Bill: Ministerial evidence session

10:30–12:00

(Pages 39 – 151)

Huw Irranca-Davies, Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

Jackie Price, Head of the Greyhound Team, Welsh Government

Elizabeth Thomas, Lawyer, Welsh Government

Attached Documents:

Research brief and key issues

Written evidence – Greyhound Action Ireland – 27 October 2025

Written evidence – Greyhound Board of Great Britain: Addressing

Misinformation in the Greyhound Racing Debate – 14 October 2025

Written evidence – RSPCA: Responding to the Greyhound Board of Great

Britain's letter of 20 October – 22 October 2025

Consultation Pack

7 Papers to note

12:00

7.1 Reviewing Committee Effectiveness in the Sixth Senedd

(Pages 152 – 153)

Attached Documents:

Letter to the Chairs' Forum: Responding to the consultation on reviewing Committee Effectiveness in the Sixth Senedd – 6 October 2025

7.2 Welsh Government international relations

(Pages 154 – 155)

Attached Documents:

Letter to the First Minister: Providing feedback on the first progress against the International Delivery Plan report – 6 October 2025

7.3 Funding for NoFit State

(Pages 156 – 158)

Attached Documents:

Letter to the Arts Council of Wales: Seeking urgent assurance on NoFit State funding and engagement with the Welsh Government on sector fragility – 17 October 2025

Letter from the Arts Council of Wales: Providing assurance on NoFit State funding and sector fragility engagement – 17 October 2025

7.4 Issues facing grassroots sport in Wales

(Pages 159 – 160)

Attached Documents:

Letter from the Chair of the Petitions Committee: Highlighting the issues facing grassroots sport in Wales, following their consideration of petition P-06-1526 – 22 October 2025

7.5 Welsh Government Draft Budget 2026–27

(Page 161)

Attached Documents:

Letter from the First Minister: Responding to the Committee's invitation to give evidence on the Draft Budget 2026–27 – 24 October 2025

7.6 UK–EU implementation review of the Trade and Cooperation Agreement

(Pages 162 – 181)

Attached Documents:

Welsh Government response to the Committees' report on the UK–EU implementation review of the Trade and Cooperation Agreement – 29 October 2025

7.7 Inter–institutional Relations Agreement

(Pages 182 – 183)

Attached Documents:

Copy letter from the Cabinet Secretary for Economy, Energy and Planning to the Chair of the Legislation, Justice and Constitution Committee: Reporting on the latest meeting of the Tourism Inter–Ministerial Group meeting on 22 July 2025 – 31 October 2025

8 Motion under Standing Order 17.42 (ix) to resolve to exclude the public from the remainder of the meeting

12:00

Private

Break

12:00–12:10

9 Prohibition of Greyhound Racing (Wales) Bill: Consideration of evidence and key issues

12:10–13:30

Document is Restricted

Document is Restricted

Delyth Jewell MS

Chair, Culture, Communications, Welsh Language, Sport and International Relations Committee

Andrew RT Davies MS

Chair, Economy, Trade and Rural Affairs Committee

Peredur Owen Griffiths MS

Chair, Finance Committee

Mike Hedges MS

Chair, Legislation, Justice and Constitution Committee

10 October 2025

Dear Chairs,

Business Committee review of the Public Bill and Member Bill processes: publication of pre-introduction Bills

As you know, the Business Committee is reviewing the Senedd's processes relating to Public Bills. This includes matters relating to Bill timetabling, and, in particular, the Welsh Government's recent practice of publishing pre-introduction versions of Bills introduced during Year 5 of the Sixth Senedd.

As Committees that are involved in the Stage 1 (or Initial Consideration) scrutiny of the Bills that have been published in accordance with this practice, we would welcome your views. For example:

1. Whether the publication of the Bill prior to its formal introduction was useful.
2. Whether it enabled you to take any decisions or carry out any activities that you would otherwise have been unable to.
3. Whether there were any associated disadvantages, limitations or risks.
4. Whether future Welsh Governments should be encouraged to continue the practice of publishing Bills prior to formal introduction.

We would be grateful if you could send your response to SeneddBusiness@senedd.wales by Friday 14 November 2025.

Yours sincerely,

A handwritten signature in blue ink that reads "Elin Jones".

The Rt Hon Elin Jones MS
Chair of the Business Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.



Welsh Parliament
Citizen Engagement Team

Prohibition of Greyhound Racing (Wales) Bill: Engagement Findings

November 2025



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1. Engagement Summary

The following engagement summary provides an overview of the engagement programme's design, facilitation, and findings.

Background

- 1.** The Prohibition of Greyhound Racing (Wales) Bill has been referred to the Culture, Communications, Welsh Language, Sport and International Relations Committee for Stage 1 scrutiny of its general principles.
- 2.** The Committee wished to understand public views on the Bill, the sport of greyhound racing, and related issues such as animal welfare, with particular reference to the following inquiry terms of reference:
 - Whether there is a need for legislation to deliver the Bill's stated policy objective, which is to prohibit greyhound racing in Wales.
 - Whether there are any unintended consequences arising from the Bill.
- 3.** The Citizen Engagement Team facilitated an online survey, shared publicly between 2 and 19 October. This report summarises the responses received.

Objectives

- 4.** The engagement exercise had two main objectives:
 - a. To enrich the Committee's evidence-gathering process, offering a nuanced understanding of public perspectives on the Bill, the sport, and welfare considerations; and
 - b. To provide an accessible way for people in Wales to share their views and experiences relating to the Prohibition of Greyhound Racing (Wales) Bill.
- 5.** The objective of the survey design was to capture the reasoning, attitudes, and feelings of respondents towards greyhound racing and the proposed prohibition, as well as related welfare concerns. By using a survey, open to the general public, the Committee aimed to gain a broad sense of opinion and insight into the social and ethical views of the issue.

Methodology

- 6.** A mixed method research design was adopted to understand public sentiment and the reasoning behind different perspectives. The survey included a number of structured questions alongside open-text responses, allowing respondents to explain the motivations, experiences, and opinions informing their views.
- 7.** This approach was not intended to generate a representative sample or focus on a statistical measure of public opinion. Instead, it aimed to illustrate the diversity of views expressed and provide insight into the values, reasoning, and contextual factors shaping those views.
- 8.** Accordingly, the findings should be interpreted as indicative of the sentiments of those who took part, rather than representative of the wider Welsh population. They provide valuable insight into the reasoning and attitudes of individuals who engaged with the consultation but do not seek to quantify levels of support or opposition within the population as a whole.
- 9.** The survey was disseminated using online platforms and through Senedd engagement activity to maximise accessibility. While every effort was made to encourage participation across Wales, it is recognised that engagement of this nature may be influenced by self-selection effects and by how awareness of the survey spread through interest and community networks. These factors are recognised as part of the natural limitations of open, voluntary participation exercises.
- 10.** The survey design and facilitation followed established Senedd practice for informal citizen engagement. Personal data collection was minimal, optional, and compliant with data protection and GDPR requirements to protect anonymity and encourage open participation.

Participants

- 11.** Given the Bill's focus on banning greyhound racing in Wales, the survey invited only those living in Wales to respond. A total of 815 responses were received, of which 772 stated they were Welsh residents and were invited to complete the remaining questions.
- 12.** Responses were received from all Welsh local authorities and across all adult age categories. Further demographic detail is available in Annex 1.

Summary of Findings

13. The data shows there is a clear division in support for banning greyhound racing in Wales, with responses nearly evenly split between 'Yes' and 'No' to the question of whether the Welsh Government should ban greyhound racing.

14. The following summary reflects the views and experiences of individuals who took part in the survey and is presented qualitatively to illustrate the range of perspectives expressed.

Perspectives in favour of prohibition

15. Respondents who supported prohibition tended to focus on issues of welfare and ethics. Their comments commonly reflected the following themes:

- **Animal welfare concerns** – Respondents frequently described greyhound racing as inherently harmful or exploitative. Many referred to reported injuries, neglect, or poor living conditions for retired dogs. Some respondents expressed the belief that no form of regulation could fully safeguard animal welfare within a profit-driven racing environment.
- **Moral and ethical considerations** – Several respondents viewed greyhound racing as inconsistent with contemporary values around animal rights and wellbeing. For these respondents, prohibiting the sport was framed as a moral obligation and a necessary reflection of societal progress.
- **Perceptions of public image and reputation** – A number of participants noted that ending greyhound racing could enhance Wales's reputation as an ethical and animal-friendly nation.
- **Scepticism about self-regulation** – Some respondents expressed doubts about the effectiveness of existing welfare standards or the ability of the industry to self-regulate. They argued that previous incidents had undermined confidence in voluntary or internal monitoring systems.

Perspectives opposing prohibition

16. Those opposed to prohibition most often emphasised welfare standards, cultural identity, and potential economic consequences. Their reasoning reflected several recurring themes:

- **Confidence in existing welfare standards** – Opponents of prohibition often described current welfare practices as robust, citing veterinary oversight,

regulatory frameworks, and examples of responsible ownership. Some highlighted the positive relationships between owners and dogs as evidence that welfare was prioritised.

- **Cultural and community importance** – Several respondents emphasised the long history of greyhound racing in certain Welsh communities, describing it as a valued local tradition that brings people together. For them, prohibition represented a loss of cultural heritage and community identity.
- **Economic and social impact** – A frequently mentioned concern related to potential job losses, reduced tourism, or the closure of local facilities associated with the sport. Respondents raised the risk of negative consequences for those economically dependent on greyhound racing.
- **Unintended consequences** – A number of participants warned that prohibition could lead to unregulated or underground racing, or to increased abandonment of greyhounds. They suggested that strengthening regulation and enforcement, rather than an outright ban, would be a more effective approach.

The Committee and the Citizen Engagement Team thank everyone who took part in this engagement exercise. Their insights have made an important contribution to the Committee's scrutiny of the Prohibition of Greyhound Racing (Wales) Bill.

2. Engagement Findings

This section provides more detail on the responses received and the views expressed in favour and against the prohibition of greyhound racing.

Perspectives in favour of prohibition

17. 53% of respondents answered 'Yes' to the question 'Do you think the Welsh Government should ban greyhound racing in Wales?'

Your experience with greyhound racing

18. The first group of survey questions established respondents' familiarity or engagement with greyhound racing.

19. Of those in favour of prohibition, some have direct experience, with 17% having attended a greyhound race in the past, though very small numbers (3 respondents) state they would attend in the future. 20% have watched a race remotely, again with small numbers (6 respondents) open to doing so in future. 7% have placed a bet on a race, with very few (2 respondents) willing to bet in future.

Animal welfare

20. The second group of questions explored respondents' attitudes towards the proposed legislative change.

To what extent are you concerned for the welfare of racing greyhounds?

21. Of the respondents who agreed with a ban on greyhound racing, the vast majority (97.5%) answered that they were 'Very concerned' for the welfare of racing greyhounds, with 2% answering that they were 'Somewhat concerned'. 0.5% did not know.

22. Of those responses, a number of themes emerged in the open text box that followed:

Welfare and treatment concerns

23. Respondents expressed significant concern about both the physical and psychological welfare of racing greyhounds. This included frequent mentions of injuries such as broken legs and fatal accidents, trauma, PTSD, and poor living conditions such as unhygienic kennels, lack of comfort and insufficient enrichment (meaning a lack of activities, toys, social interaction, or opportunities for exercise and mental stimulation that are important for a dog's overall well-being).

"I am deeply concerned about the welfare of greyhounds used in racing. These dogs often live in poor conditions, suffer injuries, and face uncertain futures once they can no longer race. Many are abandoned, sent to overcrowded shelters, or put down. Breeding dogs purely for speed and profit is unethical and unfair."

"The sheer number of dogs who are injured or put to sleep through the racing industry is disgusting. Our rescue greyhound was in such a state with broken bones which weren't attended to by his racing owners."

Abandonment, aftercare, and disposal

24. A recurring theme was the fate of greyhounds after their racing careers end. Respondents reported that greyhounds are often abandoned, euthanised, or sent to rescue centres, with insufficient support for rehoming and significant pressure falling on charities.

"The treatment of the animals after they finish racing is of concern. Once they stop earning money what good are they to trainers? Many are abandoned and need rehoming."

"There is a huge discrepancy in the welfare and care that greyhounds receive during and after their time racing. The amount of greyhounds needing rehoming is huge and there is no protocol for the greyhounds that struggle to be rehomed."

25. Overbreeding and the disposal of dogs that fail to meet expectations for racing are also cited as concerns.

"The dogs are just a commodity to make money."

"When they aren't any good to race they just disappear."

"There is significant over breeding by breeders/trainers to find just a few dogs which they think will make the grade. The rest are discarded/killed when no longer required."

Regulation, oversight, and enforcement

26. Some respondents felt current regulations are insufficient or poorly enforced, calling for stricter oversight, more frequent welfare checks, and harsher penalties for mistreatment.

"The welfare standards are not good enough; more oversight is needed."

"Unregulated, unsafe conditions, no regard for animal welfare, unsafe practices, unsustainable management."

"Adopter of 4 ex racing greyhounds, including a disabled dog whose leg was broken on the valley track since it has been licensed by GBGB (Greyhound Board of Great Britain) – regulation does not work."

27. There are also concerns about the risk of unregulated or underground racing if the sport is banned.

Ethical and moral considerations

28. Several responses frame greyhound racing as inherently cruel or outdated, objecting to the use of animals for entertainment or profit, especially where it could lead to suffering.

"I think it's an incredibly cruel and archaic form of sport. Dogs are often at risk of fatal injury and are often discarded by breeders as soon as they hold no racing value."

"This activity is inhumane and Wales needs to join the vast majority of other countries in banning this vile practice."

Personal experiences and observations

29. Many respondents reference personal experiences with rescued or retired greyhounds, describing trauma, injuries, or behavioural issues resulting from racing.

"I have seen first-hand the trauma and PTSD retired greyhounds have experienced, it's absolutely diabolical that it is still happening."

"We have rescued 2 greyhounds from the track. They have both been quite traumatised dogs. One was shut down totally and did not engage very much with us ever. The second younger dog took over a year to settle in, but still flinches. Hates ears touched after tattoos in ears and is nervous of men."

"I have worked as a vet at a greyhound track as part of my first job. I was asked to euthanise healthy young dogs almost every time I attended and some of those that sustained track injuries."

Economic and practical factors

30. Some responses mention euthanasia or killing of greyhounds for economic reasons, especially when they are no longer profitable or are injured. The stress and risks associated with transportation between races are also highlighted as welfare concerns.

31. Some also highlighted the lack of adequate rehoming support and the burden placed on charities.

"Concerned about the racing industry's habit of discarding young dogs, often with injuries that may negatively affect their wellbeing and mobility as pets. The industry expects dog rescues not only to find forever homes for a constant stream of discarded dogs, and also to re-socialise them to get them used to living in a family home, and pay for any long-term vet care to manage mobility issues or chronic pain as a result of old racing injuries."

Your views on banning greyhound racing

Do you think banning greyhound racing could have any unintended consequences?

32. Respondents who supported prohibition expressed a number of perspectives. The main themes were:

Welfare of greyhounds after the ban

33. Many respondents worry that a ban could lead to a sudden influx of unwanted greyhounds, with some being abandoned, euthanised, or sent to shelters that may not have the capacity to cope.

“Without proper planning, many greyhounds could be euthanised or overwhelm dog shelters. Rehoming them is not always easy, as ex-racers can have behavioural issues or special needs that make adoption challenging.”

34. Many highlight that animal charities and rescue centres could be overwhelmed by the sudden increase in greyhounds needing homes, especially in the short term.

35. There are calls for additional funding and planning to support these organisations during the transition.

“My only concern is rehoming, it needs to be planned properly.”

36. There is a strong call for phased implementation and government or charity support to ensure greyhounds are rehomed safely and not left at risk.

“Dogs left over needing rehoming, so the ban must be phased to not overwhelm rehoming centres.”

Potential for illegal or underground racing

37. A significant number of responses mention the risk that banning the sport could drive it underground, making it harder to regulate and potentially increasing cruelty and suffering for the dogs.

“I do have concerns that racing will go underground, become unregulated and create more suffering and pain to greyhounds. Much like dog fighting, I fear money will be made on the 'black market' and greyhounds' suffering will become invisible.”

38. Some suggest that strict laws and effective enforcement will be needed to prevent illegal racing and protect animal welfare.

Economic and employment impacts

39. Several responses note that banning greyhound racing could result in job losses for those employed at tracks and in related industries (e.g. betting, training).

40. Some mention loss of revenue for gambling companies and local economies, but many respondents feel these impacts are outweighed by animal welfare concerns.

“Loss of revenue for gambling companies, plus job losses at the venues. But greyhound racing is not a cultural issue for Wales, so I don’t think the impact on Wales would be noticeable aside from the jobs and betting losses.”

“For those people employed at tracks and any allied activities, yes of course I feel sorry that they will likely lose their jobs, but I’m afraid that this ‘sport’ is unutterably cruel & must be stopped!”

Minimising negative consequences

41. A notable group of respondents believe that any negative consequences are either manageable, short-term, or far outweighed by the benefits to animal welfare.

“No, only good thing will happen for the animals, and they are what matters.”

“Not really. Pro racing people will claim the dogs will suffer, but phased end will be manageable - and think how many dogs will be saved from suffering in the future.”

42. Some mention that charities and the public are already preparing for the change, and that with proper planning, negative impacts can be minimised.

Other notable themes

43. Some worry that dogs may be exported to countries with lower welfare standards.

44. A few see a potential positive impact on gambling addiction.

45. Very few mention loss of tradition or community, and most dismiss the idea that greyhound racing is a significant cultural issue in Wales.

Perspectives against prohibition

46. 46% of respondents answered 'No' to the question 'Do you think the Welsh Government should ban greyhound racing in Wales?'

Your experience with greyhound racing

47. The first group of survey questions established respondents' familiarity or engagement with greyhound racing.

48. Of the respondents who oppose prohibition, 91.5% have attended races in person, 88% have watched remotely, and 83% have placed bets. This indicates direct, repeated involvement with greyhound racing.

49. The numbers who would attend (98%), watch (89%), or bet (85%) in the future are even higher, showing ongoing enthusiasm and a strong likelihood to continue participating.

Animal welfare

50. The second group of questions explored respondents' attitudes towards the proposed legislative change.

To what extent are you concerned for the welfare of racing greyhounds?

51. Of those who are opposed to a ban on greyhound racing, 57% answered that they were 'Not at all concerned' about the welfare of racing greyhounds, with 17.5% answering 'Not very concerned.' 1.5% did not know.

52. A notable number of respondents answered that they were 'Somewhat concerned' (9%) or 'Very concerned' (15%) about the welfare of racing greyhounds. However, their open-text responses clarified that this concern reflected a general commitment to animal welfare, while also expressing satisfaction with the current standards of care provided to racing greyhounds.

"I am concerned for their welfare as a caring animal lover and I am also satisfied with the way owners and trainers care for their dogs."

53. A number of themes emerged in the open text box that followed this question:

General concern for animal welfare

54. Many respondents, including those involved in the racing industry, emphasised that animal welfare should always be a priority.

55. They described current welfare standards for racing greyhounds as high, citing regular veterinary checks, attentive care, and robust governance. Several noted that organizations such as the Greyhound Board of Great Britain (GBGB) enforce strict rules and oversight, contributing to improved welfare in recent years.

"The welfare of the greyhounds is at the forefront of all concerned. There is governance in place to ensure this. There are vets at the tracks and all the dogs are well loved and cared for."

Greyhounds' experience and enjoyment

56. A common perspective is that greyhounds are well cared for and treated like athletes, with good food, exercise, and dedicated trainers or owners.

"Greyhounds are kept in top condition medically and fitness wise to participate in racing. This is the natural instinct of the dog."

57. Many believe that greyhounds enjoy racing and that it is in their nature to run and chase, arguing that dogs would not participate if they did not want to.

"The dogs are well cared for and live to run."

"These dogs are bred for the purpose of chasing something they do of their own according. They are not forced to do it (you can't make a dog do something they do not want to do) they get pleasure and enjoyment from doing it."

Comparisons with other sports

58. Respondents often compared greyhound racing favourably to other animal sports, such as horse racing, and suggested that pet dogs may sometimes experience worse welfare. Injuries, they argued, can occur in any sport or daily life.

"Greyhounds are exactly the same as racehorses they are looked after and cared for better than most people are."

"The facilities available to all dogs and trainers at venues get better treatment than is available to NHS patients."

"Very safe, safer than horse racing."

Personal experience

59. Many shared positive personal experiences as owners, trainers, or visitors to tracks and kennels, reporting that retired greyhounds were healthy, well-socialised, and made excellent pets.

"I have adopted retired greyhounds and they were healthy, well-socialised, and made wonderful pets."

Views on regulation and improvement

60. While most respondents expressed satisfaction with current welfare standards, many supported ongoing review and continuous improvement.

61. Suggestions included better rehoming support for retired greyhounds, enhanced safety measures at tracks, and increased transparency.

"The industry has improved greatly and can continue to improve. They have track vets, the best food, are highly regulated and the dogs are happy."

"GBGB greyhound kennels are heavily regulated and dogs are all traced and tracked with spot kennel inspections, veterinary inspections."

62. Some were sceptical about the need for further government regulation, believing the existing framework is sufficient, while others welcomed additional oversight if it led to genuine welfare improvements.

Economic and social value

63. Some responses highlighted the social and economic benefits of greyhound racing, such as job creation, community engagement, and tradition, suggesting these factors should be considered alongside welfare concerns.

Regulation and welfare standards

64. Those who opposed prohibition were invited to answer further questions about their satisfaction with current welfare standards and whether they would like to see any improvements.

If you do not support a ban on greyhound racing, are you content with the current level of regulations for the welfare of racing greyhounds?

65. 85% of respondents answered that they are content with current regulations. A notable number (11.5%) answered that they were 'Not sure' and a small number (3.5%) that they were not content.

Would you like to see an improvement in welfare standards for racing greyhounds?

66. Of those who were content with current regulations, 56% answered 'No' to this question, with the following responses given when asked to expand on this answer:

Satisfaction with current welfare standards

67. Many responses expressed that the welfare standards for racing greyhounds are already high, adequate, or even exemplary.

68. Respondents frequently mention that the dogs are well cared for, with regular veterinary oversight and loving staff.

"The dogs are well cared for with care 24 hours a day by loving staff."

"Welfare standards for racing greyhounds are at present at high standard and are monitored by the greyhound racing board."

"The current racing standards are already brilliant for the greyhounds involved in the sport."

Regulation and oversight

69. There is a strong emphasis on the sport being well regulated, particularly by the GBGB. Respondents highlight that existing rules and regulations are robust and sufficient.

"There is no need as the Valleys already is under GBGB rules and regulations. No need to reinvent the wheel."

“The track at Ystrad Mynach has undergone significant upgrades in recent times to fully meet the required standards.”

“People who work on the tracks are trained and that continues through GBGB courses to ensure the utmost safety of the dogs and vets on site for immediate treatment.”

Opposition to further regulation or government intervention

70. A recurring theme is resistance to additional regulation or government involvement, with some respondents viewing it as unnecessary or politically motivated.

“A Welsh government leader licensing would just be another stealth tax.”

“No evidence to suggest this is needed – government overreach.”

Comparison to other animal sports and pet ownership

71. Several responses compare greyhound racing welfare standards favourably to other sports (like horse racing) or to pet ownership.

“If it were then the Welsh Government would be banning horse racing which has worse death rate in Wales than racing greyhounds.”

“Greyhound racing is already heavily regulated. If you compare the welfare of greyhounds to say the average pet dogs, then you might conclude that pet ownership should be regulated.”

Continuous improvement and self-regulation

72. While most respondents feel standards are high, some acknowledge that improvements are always possible and that the industry is committed to ongoing enhancement.

“Improvements will always happen as owners don't want their dogs hurt, so standards will improve with knowledge and research that is continually happening.”

“The greyhound industry is constantly looking for ways to improve the safety and welfare of greyhounds.”

“The level of welfare has risen over the last several years and is now at a practical level. Risk cannot be eliminated totally.”

Care for retired greyhounds

73. There is mention of the care and rehoming of greyhounds after their racing careers, suggesting a holistic approach to welfare:

“The care for greyhounds, even after they retire from racing, is well catered for and even after they go on from the sport every effort is made to make sure they have a full and rewarding life in their futures outside the sport.”

“Greyhounds are earmarked and microchipped at 12 weeks old. This follows them throughout their career. Once retired they are placed on a rehoming list and validation checks are done on suitable homes during the rehoming process.”

Scepticism toward criticism

74. Some responses question the motives or accuracy of those advocating for change, suggesting that criticisms are unfounded or based on misinformation.

“Welfare standards are more than adequate if only people would go and witness this for themselves and not listen to people who spread untruths about the dogs and the sport.”

“It’s obvious these dogs get better care than the vast majority of people. Let’s start regulating the ‘rescue’ groups who spread misinformation.”

75. 31% of respondents answered that they would like to see improvements in the regulations, along with those who answered *Not sure* (13%), with the following themes arising from both of these groups of respondents:

Continuous improvement

76. The phrase “*there is always room for improvement*” appears repeatedly, reflecting a strong consensus that greyhound racing, like any sport, should continually strive to enhance standards, especially regarding welfare and safety.

Animal welfare and safety

77. Many responses emphasise the importance of welfare checks, safety measures (e.g., providing nets at the finish line, creating wider bends), and regular reviews of regulations to ensure the welfare of greyhounds is paramount.

“Guidelines to welfare of animals should always be reviewed on a regular basis.”

“We can always do more for all animals.”

78. There’s a call for better enforcing current rules and licensing schemes to maintain high welfare standards and accountability.

Regulation and oversight

79. Respondents frequently mention the role of the GBGB in regulating the sport and ensuring safety.

“The GBGB are always striving for more regulation.”

“Licensed racing under GBGB rules.”

80. Some suggest that independent oversight by welfare experts is preferable to an outright ban, and that regulation should be ongoing and responsive to new challenges.

“Well-regulated with independent oversight by welfare experts is preferable to an outright ban.”

“There could always be more regulations to help make it even more safe.”

Track and facility improvements

81. Suggestions include improving track design (e.g. wider or more elongated bends, limiting the number of dogs per race on tight tracks), upgrading facilities, and ensuring that venues are well maintained and staffed.

"I would like to see improvements to the tracks if possible."

"They could make the bends wider or more elongated to help with reducing injury."

Accountability and transparency

82. There are calls from some respondents for greater transparency and accountability for charities who are accused of developing conspiracy theories and bad trainers, who are accused of not caring for dogs properly.

"Identify deficiency and make improvements, don't just ban something because you don't like the idea of it."

"Take action on the trainers that do not look after dogs properly."

Retirement and rehoming

83. Several responses highlight the need for responsible rehoming of greyhounds after their racing careers, with suggestions for more responsibility on owners and support for rehoming efforts.

"I think that more responsibility should be on the owner regarding rehoming."

Funding and investment

84. Some respondents advocate for increased funding, such as a statutory levy on bookmakers, to support welfare improvements, facility upgrades, and rehoming initiatives.

"Welsh Government should implement a compulsory levy on bookmakers to help pay for increased rehoming efforts via GBGB approved centres."

"More investment means better facilities for the dogs and people working in the sport."

Welsh Government's role

85. There are mixed views on the Welsh Government's involvement, with some calling for more funding and legislative support, while others question the effectiveness or necessity of separate Welsh schemes.

"But as it is already regulated by the GBGB there would be no need for a separate Welsh scheme."

"A licensing scheme is a better option. Given there is only 1 track in Wales a ban is just posturing and will make zero difference to welfare."

Your views on banning greyhound racing

Do you think banning greyhound racing could have any unintended consequences?

86. Respondents who oppose prohibition expressed a number of perspectives. The main themes were:

Job losses and economic impact

87. Many responses highlight concerns about significant job losses for trainers, kennel staff, track workers, and those in related industries (e.g. suppliers, hospitality, veterinary services).

88. There is a strong sense that the ban would negatively affect local economies, especially in communities where greyhound racing is a major employer or social hub.

"Yes, a loss of jobs that are vital in a small town and the community and damage the culture of the whole of the UK by preventing people from enjoying a well-established tradition."

Welfare and fate of greyhounds

89. A recurring theme is anxiety over the welfare of the dogs themselves. Respondents fear that, without racing, many greyhounds would be abandoned, euthanised, or struggle to find suitable homes.

"I do worry that the trainers won't be able to afford to keep them, meaning a lot more end up needing rehoming. I don't think there are enough people out there willing to rehome these beautiful animals."

90. There are concerns that rehoming centres would be overwhelmed and unable to cope with a sudden influx of retired racing dogs.

Threat to the greyhound breed

91. Many believe that banning racing could lead to the decline or even extinction of the greyhound breed, as there would be less incentive to breed and maintain them.

92. Some responses argue that greyhounds are "bred to run" and that removing this outlet would be detrimental to their well-being and the breed's future.

Loss of social and community value

93. Responses frequently reference the loss of a valued social activity and community tradition. Greyhound racing is described as a source of social interaction, recreation, and community cohesion.

94. Some respondents mention the impact on mental health and well-being, especially for those whose lives revolve around the sport.

Risk of unregulated or underground racing

95. Several responses warn that banning the sport could drive it underground, leading to unregulated, potentially more dangerous and less humane forms of racing.

96. There is concern that welfare standards would deteriorate without oversight, increasing risks for the dogs.

"Yes, it would go 'underground' and the protection the dogs have now due to the transparency of public tracks would be missing."

"Yes. This is where things go underground and animals will not be treated properly."

"A ban may force it 'underground', and therefore avoid any regulation at all."

Banning other activities

97. Some contributors fear that banning greyhound racing could set a precedent for prohibiting other animal-related sports (e.g., horse racing, fishing, shooting, working dogs).

“You open the floodgates to banning every sport or activity involving animals.”

98. This theme is often linked to broader anxieties about government overreach and loss of personal freedoms.

Scepticism toward the ban’s rationale

99. A number of responses express scepticism about the motivations behind the ban, suggesting it is politically driven or based on misinformation.

100. Some feel that the government has not adequately consulted with those involved in the sport or considered the full consequences.

Impact on animal welfare and regulation

101. There is a belief that current regulation provides important welfare protections for greyhounds, and that a ban would remove these safeguards.

102. Some argue that improving standards within the sport would be preferable to an outright ban.

Unsure about prohibition

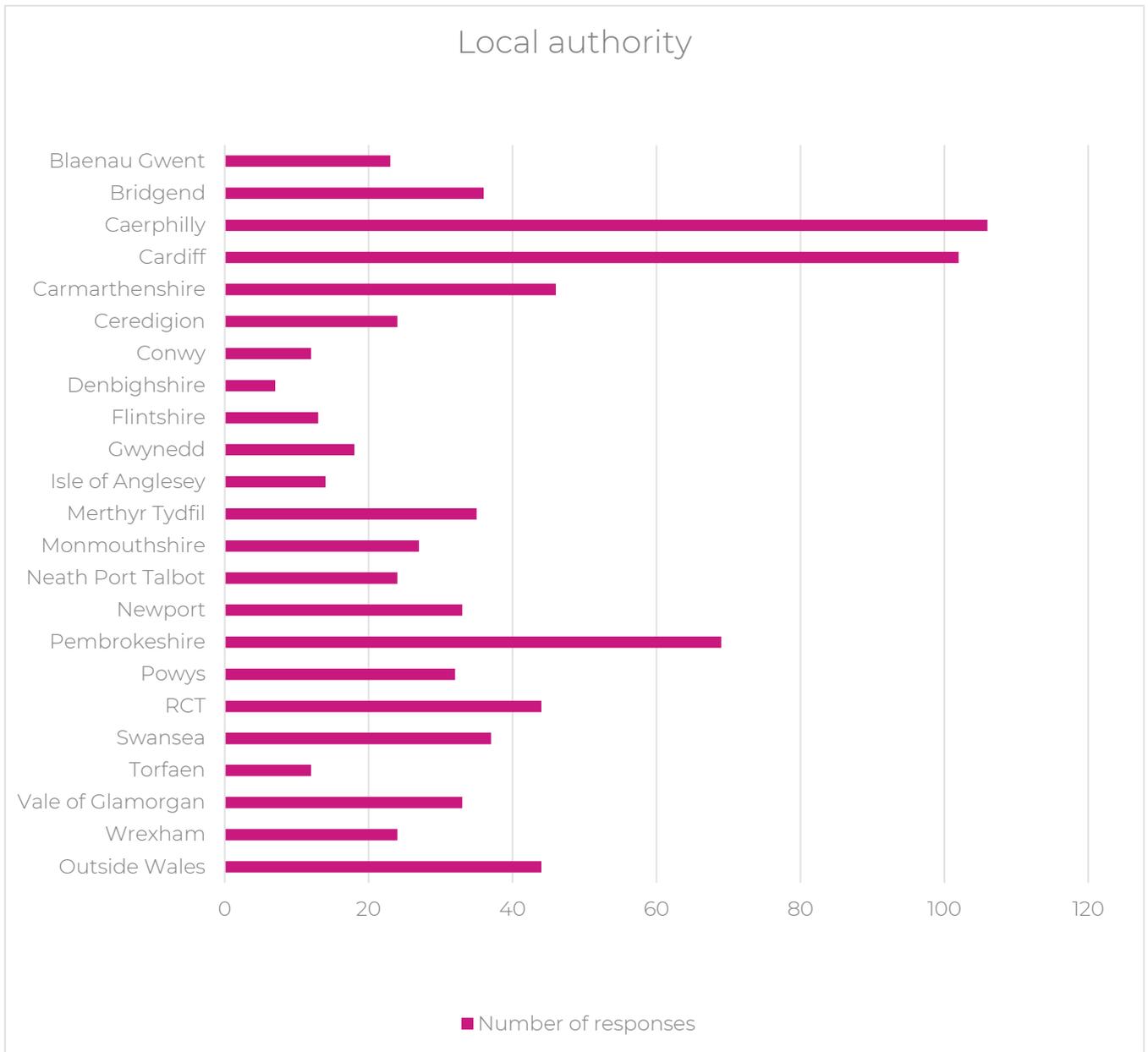
103. A very small number of respondents (1%) were unsure on their stance on prohibition, stating uncertainty about whether existing guidelines are adequate or properly enforced.

104. Their responses in the open-ended questions follow the same themes as those raised in favour or against the ban so have not been detailed separately.

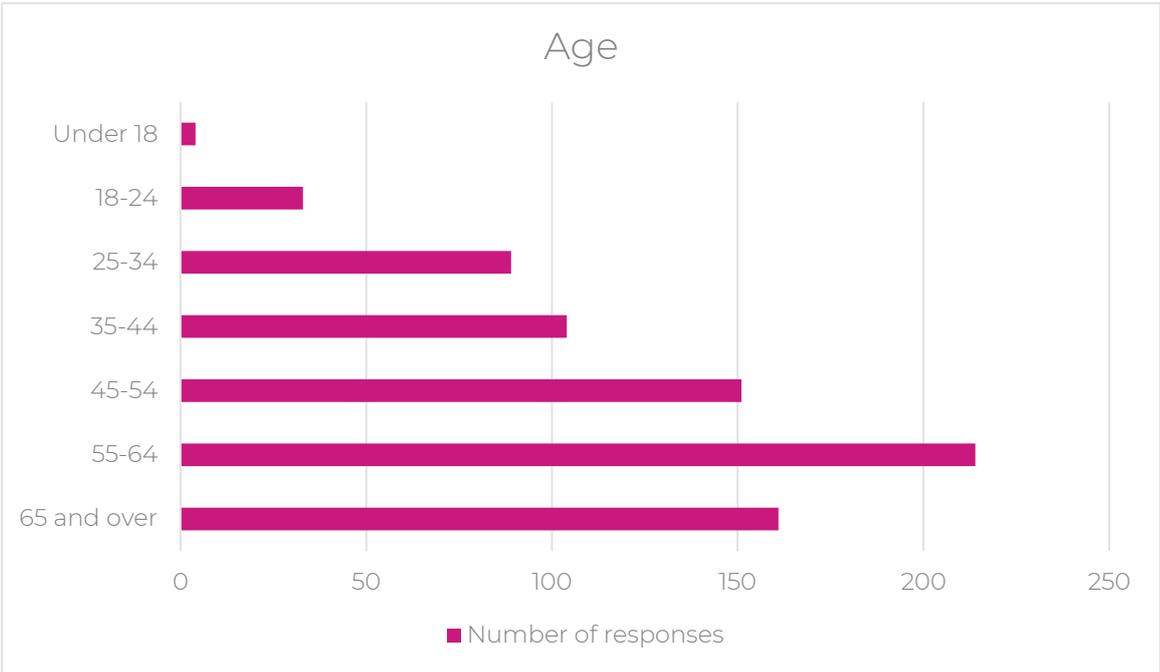
3. Annex 1: Participants' Demographic

Below is a list of all diagnoses presented by participants:

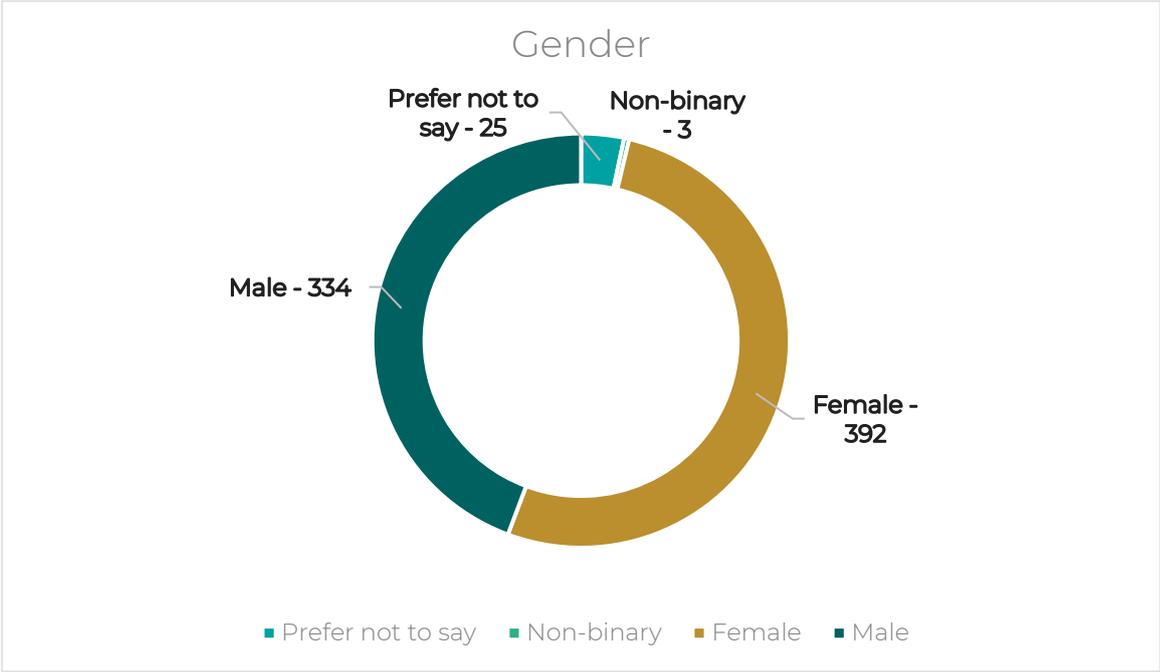
105. In which local authority do you live?



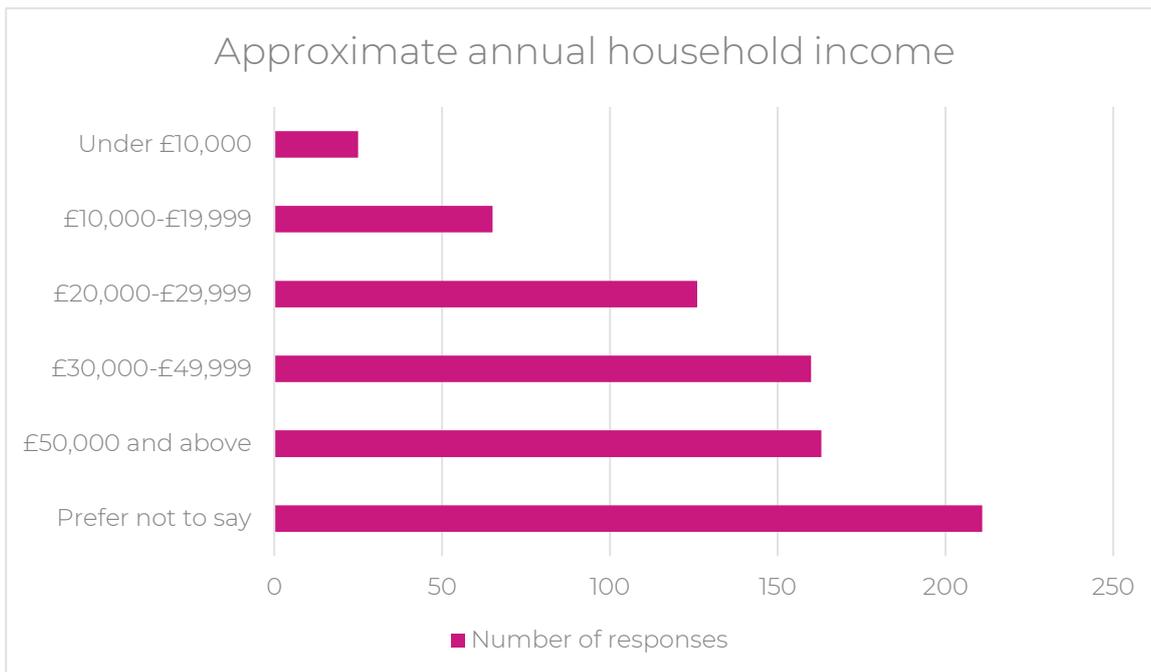
106. What is your age group?



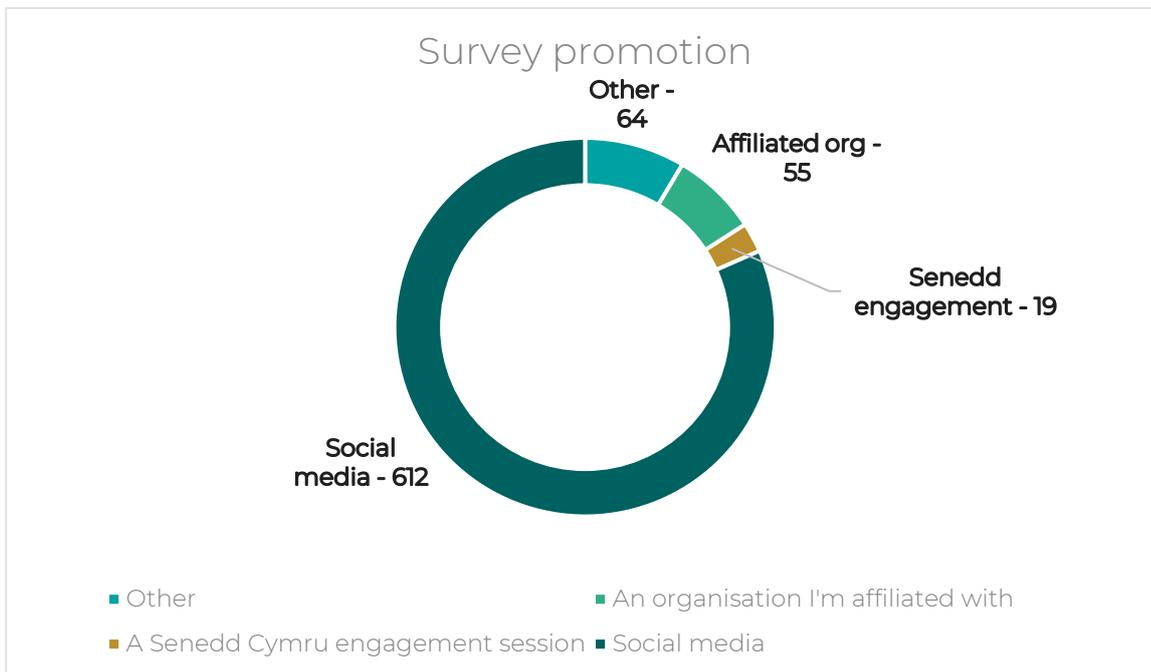
107. What is your gender?



108. What is your approximate annual household income?



109. How did you hear about this survey



Document is Restricted

Dear Haidee

RE: Evidence in relation to wastage and traceability of greyhounds in Ireland

Following comments made by Mark Bird of GBGB with respect to “wastage” and the traceability of Irish greyhounds in the Committee’s evidence session of the 23 October, I am writing on behalf of Greyhound Action Ireland to set the record straight.

Mr Bird claimed that “*Since 2021, Greyhound Racing Ireland, the semi state run regulator has a full traceability system in place to make sure all of their dogs from birth to when they finish racing are accounted for*”.

However, this simply is not true. Analysis of the data produced from Greyhound Racing Ireland’s own, Rásaíocht Con Éireann Traceability System (RCETS) shows that of the racing greyhounds born in 2021, the first year this system was operational, 5,150 (41%) are already dead or unaccounted for. The oldest of those dogs would not yet be five! In percentage terms, the number of dead and unaccounted for dogs remains the same as was revealed in the 2019 RTE documentary *Running For Their Lives*.

Please note the 41% figure does not include greyhounds that are exported to the UK. These remain on the RCÉTS with an inactive status, specifically marked as "exported".

This information is taken from a soon to be published report by Preferred Results Ltd on behalf of Greyhound Action Ireland analysing RCETS - Greyhound Racing Ireland's traceability system. Preferred Result Ltd is the business consultancy company which carried out a business analysis for the Irish Greyhound Board (since re-named Greyhound Racing Ireland) in 2017. Details of the report prepared following that analysis were subsequently leaked to RTE, the national broadcaster. The documentary *Running for Their Lives* broadcast on national TV in 2019 was based on the findings of that report – namely that the Irish greyhound industry was breeding 1,000% more dogs than it needed, resulting in 6,000 plus racing greyhounds being killed every year because they had become surplus to requirement.

If you require any further clarification on this point, please do not hesitate to get in touch.

Yours

Nuala Donlon

Spokesperson

Greyhound Action Ireland

Email: greyhoundactionireland@yahoo.com

#ActionGrey1

Introduction

Following the recent Ministerial Statement, the discussion held in the Siambr on 30th September and the Culture Committee hearing on 2nd October, we would like to provide a response to Members' contributions which demonstrated a lack of awareness of both the current regulatory environment and the realities of the licensed greyhound racing.

As regulator of the greyhound industry, the Greyhound Board of Great Britain believes that all those in a position to make a decision on the future of the sport in Wales must be fully aware of the facts of the matter, rather than relying on hearsay or outdated arguments.

We continue to ask Members to engage with all sides of the arguments; despite differing opinions we believe that the voices of the communities affected should be given a fair hearing and are grateful to those who have visited the Valley to see first-hand the positive impacts of regulation on greyhound welfare and the local economy. The Valley Stadium continues to extend an open invite to Senedd Members to visit the track as the legislation moves through the Senedd.

Misrepresentation of Public Opinion and Consultation Data

- **Claims that “35,000 people across Wales” called for an end to greyhound racing are misleading.**
 - The Petition Committee data confirms that only 53% of the 35,101 signatories were actually in Wales, and the petition itself predates the licensing of the Valley Stadium. It is therefore not a reflection of current standards or public sentiment regarding regulated greyhound racing in Wales.
 - A counter-petition supporting greyhound racing received over 10,000 signatures but was not considered until after the Minister had already proposed a ban, demonstrating a lack of balance in how public opinion has been presented.
- **The consultation cited as evidence of “strong public concern” cannot credibly be described as overwhelming support for a ban.**
 - This consultation involved just over 1,100 responses—less than 0.04% of the Welsh population, and at no point on the Welsh Government’s website page for the consultation, was it made clear that this was consulting on a ban ([see here](#)).
 - Notably, in the Welsh Government’s own analysis of the responses to the consultation they made clear that 40% of those supporting a ban (28.32% of all responses) were in fact duplicates of the same campaign response submitted by different people, yet these were still used to justify the policy shift.
 - Excluding these duplicate responses, 36% of respondents supported a phased ban and 35% opposed a ban or were undecided.
 - The voices of those directly involved in the sport, as well as the communities and businesses that rely on it, have been consistently sidelined in favour of campaign-led narratives.

Outdated and Unevidenced Welfare Claims

- **Assertions of “a lot of wastage” in the industry are based on outdated myths.**

- All British-bred greyhound litters are registered and tracked, and robust schemes are in place to ensure the welfare and retirement of every racing greyhound.
- **Injury statistics are frequently misrepresented.**
 - GBGB's data records the number of injuries, not the number of individual greyhounds injured.
 - Minor injuries (such as scrapes or split webs) are counted separately and most dogs return to racing within 28 days. Serious injuries are managed with veterinary oversight and supported by dedicated retirement schemes.
 - The injury rate reached a record low in 2024 of just 1.07% against total runs.
 - Contrary to claims made in the Senedd there is no evidence to suggest that an increase in racing correlates with an increase in the '*propensity*', for an injury to occur.

Failure to Recognise Regulatory Improvements

- **Welfare concerns highlighted in the Senedd stem from a time period before licensing**
 - GBGB agrees that standards in unlicensed greyhound racing are often far below acceptable which is why we have worked tirelessly to implement consistent and effective regulation.
 - Many of the welfare concerns cited by campaigners and referenced in Senedd debates relate to a period before the Valley Stadium was licensed and regulated by the GBGB.
 - Since licensing, there have been significant improvements in welfare standards, veterinary oversight, and transparency. The Valley Stadium now operates under a comprehensive regulatory regime, with regular independent inspections, strict veterinary oversight and ongoing investment in track safety and greyhound care.

Economic and Community Impact Overlooked

- **The economic and social value of the Valley Stadium as a community asset has been ignored in the rush to legislate.**
 - The track provides employment, supports local businesses and serves as a social hub in the area.
 - The Welsh Government made little effort to assess the important role the track plays, both socially and economically, before pursuing this legislation and the Minister has never visited the stadium. Despite the Valley submitting evidence on job numbers, the economic impact assessment for the Bill has ignored this and stated: "*The prohibition of greyhound racing would result in a direct financial loss to the Valley Stadium business, which currently profits from greyhound racing. The financial impact on the owners is not known, due to the lack of available data on its financial activities linked to greyhound racing.*"

Summary

The debates on the proposed Bill have so far been dominated by outdated perceptions, selective and often misinterpreted data, and a failure to engage with or acknowledge the realities of a now-regulated industry. Any decision on the future of greyhound racing in Wales must be based on *current* evidence, balanced consultation, and a genuine understanding of the improvements made since regulation. We urge all stakeholders to engage with the facts, visit the Valley Stadium, and ensure that the voices of those most affected are heard.

Culture, Communications, Welsh Language, Sport, and International Relations
Committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN

22nd of October 2025

Dear Culture, Communications, Welsh Language, Sport and International Relations
Committee,

I hope this letter finds you well. I am writing to respond to the written evidence submitted by the Greyhound Board of Great Britain (GBGB) which accuses myself, and others, of making [‘highly misleading or wholly inaccurate claims’](#) during last week’s oral evidence session. I am writing to elaborate on, and clarify, comments made about my particular contribution.

1. And then we still don't have trackside statistics now” – Billie-Jade Thomas (RSPCA)

GBGB: This is not correct. Statistics for track injuries and fatalities are published in GBGB’s annual, independently audited data as required by DEFRA. This data has been published each year since 2018.

Here I was explicitly and specifically referring to the lack of statistics relevant to individual tracks, hence the use of the word ‘trackside’ which can be [defined as](#) ‘of, relating to, or situated in the area immediately adjacent to a track’. Within this definition the word ‘track’ is singular as opposed to plural. It is entirely correct that GBGB does not provide any injury, fatality or retirement data broken down by individual tracks, despite its claims relevant to transparency.

2. “But what this Bill is to achieve is to remove the risks, the welfare risks, the injuries, deaths, to dogs while they are racing, which is inherently dangerous.” – Billie-Jade Thomas (RSPCA)

GBGB: It is impossible to 'remove the risks' to any animal, whether this be a pet, a working animal or a farm animal. Risks can however be minimised, and that can only be achieved through proper regulation. GBGB has in fact done significant work to minimise risks through its long-term welfare strategy, A Good Life For Every Greyhound. By advocating for an unevidenced ban, the Cut The Chase coalition is in fact increasing the risks of poor welfare for greyhounds which may continue to be raced in conditions which are not under any scrutiny.

I specifically state that the risks I am referring to here are relevant to 'to dogs while they are racing', as noted above. This evidence session - and the Bill it is relevant to - are both specifically focused around racing greyhounds - not pets, working animals or farm animals. As such, any rhetoric around any other type of animal is both irrelevant and deflective. It is undeniable that stopping greyhounds from racing would remove the risks associated with them racing. There are also other ways of minimising risks that have not been explored by GBGB such as researching the impact of running dogs in different directions or on tracks of designs and shapes that would be inherently less dangerous. The transfer of the Valley Greyhound Stadium from an independent track offered a clear opportunity for them to do so, but this was not taken, as mentioned by myself last week. Meanwhile, the remainder of the comment above beginning from 'By advocating...' is entirely hypothetical as there is no evidence to suggest that illegal greyhound racing may happen if a ban comes into force. As experts in the field of animal welfare, it is the RSPCA's firm view that a ban on greyhound racing will enhance animal welfare as banning greyhound racing will remove the risk of injury and fatality for a significant number of dogs each year.

3. "There's a lack of transparency regarding the industry practices and enforcement of regulatory standards as well" – Billie-Jade Thomas (RSPCA)

GBGB: This is inaccurate. GBGB publishes a fortnightly report, the GBGB Calendar, which details any disciplinary action which has taken place due to breaches of GBGB's Rules of Racing. This details both the reasons for disciplinary action, and the outcomes which can range from fines and licence suspensions to permanent warning off from the sport. Likewise, all standards underpinning GBGB regulation are publicly available, including GBGB's Rules of Racing, the Code of Practice for Residential Kennels and the British Standards' Institute's (BSI) Publicly Available Specification (PAS) for greyhound trainers' residential kennels – PAS 251: 2017 – which underpins GBGB's UKAS accreditation.

Here I am referring to the fact that there is a lack of transparency regarding industry practices and enforcement of regulatory standards, such as records of racetrack injuries to greyhounds and checks for banned substances. With most dogs bred, reared and educated on private properties outside of the UK - with the import of these dogs equating to an industry practice - there is little or no visibility of the whole life experience of greyhounds in the UK racing on GBGB tracks. Neither GBGB or UKAS publicly display injury data by racetrack (as outlined above), outcomes of

licensing inspections or residential kennel audits. Additionally, no evidence is provided to demonstrate how such information is collated and informs industry development to ensure meaningful changes are made. If collated, reviewed and actioned, such information could help to identify systemic trends across different jurisdictions and be used to take the steps necessary to improve the welfare of greyhounds.

4. "Those regulations were actually introduced in 2010. They don't actually cover trainers' kennels, where greyhounds spend 95 per cent of their lives" – Billie-Jade Thomas (RSPCA)

GBGB: This highlights a clear misunderstanding of the levels of regulation in place to protect and promote the welfare of racing greyhounds. While the Government's Welfare of Racing Greyhound Regulations 2010 do not extend to trainers' kennels, GBGB's regulatory regime for trainers' kennels is accredited by the United Kingdom Accreditation Service – a Government body. As part of this accreditation, all kennels must have an annual inspection from independent auditors SCI as well as an annual veterinary inspection to ensure the welfare of the greyhounds. This is in addition to GBGB's UKAS accredited regulatory scheme for licensed stadia, which again is based on annual, independent inspections

There is absolutely no misunderstanding here. I clearly state that the 2010 regulations relevant to England do not apply to trainers' kennels which, by GBGBs own admission as noted above, is entirely correct. It is important to note here there is no rebuttal from GBGB against me stating that some greyhounds spend 95% of their lives in trainers' kennels...

5. GBGB: '...by anti-racing groups' (as featured in the conclusion)

The RSPCA is not an anti-racing group. The RSPCA is the world's oldest and largest animal welfare charity.

I hope that the above helps clarify any concerns around my contribution, all of which was given in good faith, as well as being correct and factual, as demonstrated above. I urge the committee to recognise this clear attempt at undermining myself and my fellow panellists who were invited by the committee to give oral evidence as part of a democratic process.

Yours sincerely,

Billie-Jade Thomas
Senior Public Affairs Manager - Wales

Prohibition of Greyhound Racing (Wales) Bill: Responses to the Consultation

This document contains the responses to the public consultation on the Prohibition of Greyhound Racing (Wales) Bill, which was open from 29 September to 17 October 2025.



Contents

The following consultees provided written evidence to the Committee. All consultation responses can be viewed on the [Committee's website](#).

* Saesneg yn unig | English only

** Cymraeg yn unig | Welsh only

Rhif Number	Sefydliad	Organisation
PGRWB01*	Premier Greyhound Racing	Premier Greyhound Racing
PGRWB02*	Y Gynghair Cefn Gwlad Cymru	Countryside Alliance Wales
PGRWB03*	GREY2K USA Worldwide	GREY2K USA Worldwide
PGRWB04*	Alison Littlejohn	Alison Littlejohn
PGRWB05*	Les Penry	Les Penry
PGRWB06*	Dianne Lewis	Dianne Lewis
PGRWB07*	Robert Williams	Robert Williams
PGRWB08*	Christine Evans	Christine Evans
PGRWB09*	Jane Hurley	Jane Hurley
PGRWB10*	Dr Huw Jones Jenkins	Dr Huw Jones Jenkins
PGRWB11*	Cut the Chase Coalition	Cut the Chase Coalition
PGRWB12*	Manuela Vogler	Manuela Vogler
PGRWB13*	Y Cyngor Betio a Hapchwarae	Betting and Gaming Council
PGRWB14*	Unigolyn	Individual
PGRWB15*	Lorraine Czaja	Lorraine Czaja
PGRWB16*	Ken Needham	Ken Needham
PGRWB17*	Ruth Joseph	Ruth Joseph

PGRWB18*	Alain Thomas	Alain Thomas
PGRWB19*	Jenny Lloyd	Jenny Lloyd
PGRWB20*	Y Kennel Club	The Kennel Club
PGRWB21*	Angela Shearing	Angela Shearing
PGRWB22*	Mike Doughty	Mike Doughty
PGRWB23*	Melanie Jenkins	Melanie Jenkins
PGRWB24*	Linda Leeves	Linda Leeves
PGRWB25*	Sheila Andersen	Sheila Andersen
PGRWB26*	SPCA Seland Newydd	SPCA New Zealand
PGRWB27*	Arena Racing Company	Arena Racing Company
PGRWB28*	Battersea Dogs & Cats Home	Battersea Dogs & Cats Home
PGRWB29*	Y Gynghrair yn Erbyn Chwaraeon Creulon	League Against Cruel Sports

PGRWB 01 Premier Greyhound Racing

Ymateb gan | Response from: Premier Greyhound Racing

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?

Premier Greyhound Racing (PGR) manages media rights for Greyhound Racing in the United Kingdom. PGR and its 12 affiliated tracks, operate under Greyhound Board of Great Britain rules and licensing.

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 Greyhound Board of Great Britain (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 our 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 our 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 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 our 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, 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 be publishing 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 racecourses 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.
- 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 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. It is important to note that, according to the [British Horseracing Authority's](#) own data, the fatality rate in British horseracing (including flat and jump racing) is noticeably higher at 0.25%.
- 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. Many stadia also offer their own injury retirement schemes to ensure all greyhounds receive whatever veterinary treatment they require and this will shortly become a requirement for all stadia under the Rules of Racing. 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, PGR 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 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.
- 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 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.
- 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 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. PGR does not have any comments on Section 3.

Schedule 1 of the Bill relates to Offences by bodies corporate etc. PGR 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. PGR 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 PGR shares 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)?

We have 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 our 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 PGR that the Welsh Government have not carried out the necessary collaborative working with the members of their Implementation

Group for the Bill. Valley Greyhound Stadium and Sports Information Services (SIS), both of which are represented on the Implementation Group, would have been able to articulate their respective costs implications of the Bill had they been effectively consulted on this matter.

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.

SIS Limited alone, assess the economic loss of a minimum of £15 million over the next five years.

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 PGR 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?

GBGB and PGR 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. 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.

Whilst the GBGB and PGR 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>.

PGRWB 02 Countryside Alliance Wales

Ymateb gan: Y Gynghrair Cefn Gwlad Cymru | Response from: Countryside Alliance 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?

The stated policy intention is to prohibit greyhound racing in Wales which can only be achieved through primary legislation. We would note that the offences created by the Bill would not only prohibit the racing of greyhounds around a track but would also seem to restrict the way in which greyhounds can be trained in Wales to race elsewhere.

We do not believe that a ban is the best way to ensure the future of racing greyhounds and is based more on an ethical argument than evidence that properly regulated greyhound racing cannot be conducted in a way which minimises welfare concerns. Clearly, the risk of injury where animals are involved cannot be entirely excluded. This is also true for pet owners exercising dogs or working dogs in connection with farming, shooting or pest control. The arguments advance here in favour of banning instead of regulation would apply equally to horse racing, dog racing, catch and release angling etc.

We would also note that wider welfare concerns raised around greyhounds such as kennelling, breeding etc are already covered by extensive law as the documents accompanying the Bill acknowledge. This includes the five freedoms set out in the Animal Welfare Act 2006, which include an animal's "need to be able to exhibit normal behaviour patterns". As the Scottish Animal Welfare Commission's report on the welfare of greyhounds used for racing in Scotland points out: the pursuit phase of the race is associated with positive emotional states in dogs, and many dogs engage in chase and pursuit of moving objects suggesting it is a highly motivated behaviour for dogs. They also noted that the anticipation shown by greyhounds before a race suggests "that greyhounds do enjoy running and chasing 'prey' (the lure)". Simply to ban the activity in Wales not only prevents activities where there are positive welfare benefits for greyhounds, recognising that risk of injury should always be minimised, but in doing so is actually detrimental to welfare. We do not ban sporting activities because a person risks injury, we ensure that the activity is undertaken to minimise risk of harm, recognising a balance is struck between risk and benefit to the individual.

Ironically, the ban will do little beyond increasing the distances greyhounds will have to travel to train and compete. The fundamental problem is that the policy objective is a ban based on ideological/questionable ethical arguments and not the welfare of greyhounds properly understood.

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?

If the purpose is to ban greyhound racing in Wales, then the Bill will achieve that. However, it will also make unlawful aspects of training greyhounds. It is stated that a ban will protect the welfare of racing greyhounds, but it goes without saying that if there are no racing greyhounds then there are no racing greyhounds to protect. Once again there is extensive welfare legislation covering all aspects of dog welfare that already apply at every stage of life and these apply to greyhounds used for racing as they do to any other domestic dog. It is surprising, given the extent of the claims of poor welfare made by those opposed to greyhound racing that they do not appear to have used any of the existing laws against those who fail to ensure the welfare of their dogs and that the Welsh Government has not brought in a statutory code which it can do under existing legislation. It is also worth noting that for those who do race greyhounds, it is in their interests to ensure dogs are as well cared for and as fit as possible.

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?

There seems to be a lack of clarity regarding the scope of the offence and what it prohibits. The impact assessment etc all seem predicated on an understanding that the ban in fact only impacts the Valley stadium and those owners/trainers and businesses involved with it. This view seems supported by the fact that licensing of owners, keepers and trainers in Wales is still being considered. The Explanatory memorandum states:

8.11. The option of licensing current owners, keepers and trainers of greyhounds is not being disregarded as the prohibition does not apply to the owning, keeping or owning for the purposes of training racing greyhounds. It is being considered as part of the broader work on the national model for the licensing of animal establishments. The Implementation Group may provide further advice on this matter. However, as this option does not align with the policy objective of the Bill, to prohibit greyhound racing in Wales, it falls outside the scope of this specific assessment.

This seems to be contradicted in the Explanatory Notes to the Bill which states:

Section 2 – Interpretation

The terms 'greyhound racing' and 'operator' are defined in section 2.

'Greyhound racing' is defined as "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)". As well as covering racing greyhounds against each other, this will include the following activities (provided they involve setting one or more greyhounds to run around a track after a mechanically activated lure):

a. "trials" (where a greyhound is timed for the purpose of determining its position, or race category, either in relation to a subsequent race, or for the purpose of selling it);

b. training a greyhound to run after a mechanically activated lure.

It would seem that the provisions go beyond the stated policy intention of achieving a ban on racing, as the offence is framed such that it would also prohibit much of the training of greyhounds in Wales where these dogs are to be raced outside Wales. We would suggest the Bill is amended accordingly and also that "around a track" is defined so that training a greyhound around a field at home falls outside the offence. At the moment it is not entirely clear whether it is training in a circular (as opposed to linear) way that is prohibited and how a track might be understood.

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?

The enforcement provisions seem similar to other legislation regarding animals. The Alliance has no further comments. Enforcement is a prerequisite of enforcing a ban which is the stated policy intention.

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?

These sections are not directly related to delivering the policy intention. We believe that it is vital to minimise the harm that this legislation will do and as such ministers only commence provisions at a time when there is least impact on greyhounds, and those whose livelihoods will be impacted.

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

It rather depends whether this Bill is concerned with greyhound welfare or the product of an ideological position which, as noted above, would logically result in a ban on a significant number of other activities involving animals in Wales.

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)?

As these are technical commencement arrangements we have no comments. However, given that this is purported to be about welfare, it would seem appropriate to allow Senedd members an opportunity to approve commencement so they can be assured that the welfare of greyhounds has indeed been taken into account during the transition period.

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

As noted above the offence as currently drafted would not simply close the Valley stadium but also make unlawful aspects of training greyhounds in Wales. This does not seem to have been fully understood or reflected in the assessment made of impact or cost of enforcement nor welfare consequences for greyhounds.

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?

As above, we do not think the scope of the offence and therefore the Bill's impacts and costs have been adequately reflected. We are also surprised that no attempt appears to have been made to obtain the relevant financial data from Valley, not least in respect of its contractual arrangements with Sports Information Services (SIS) despite both being represented on the Implementation Group. Welsh Government has failed to establish basic data of individuals affected or the current and future losses resulting from this proposal. We understand that SIS assess the loss at £15 million over the next five years. This failure to obtain the data necessary to conduct a robust impact assessment is extraordinary.

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

The Bill is unprincipled, sets a dangerous precedent and seems more concerned with achieving a ban rather than improving welfare. It fails to balance the evidence which is strongly in favour of statutory regulation. We would refer to GBGB's submission about what has been done, is being done and can be done to ensure welfare of greyhounds when racing. We would therefore suggest that opting for a ban and failing to consider regulation makes the legislation disproportionate and that inadequate consideration has been given to a more measured and evidence-led solution where greyhound welfare is considered across a dog's lifetime.

Given that the Bill will effectively end a viable business and interferes with a contractual arrangement and future earnings without any compensation it would seem to infringe rights under the ECHR, in particular Article 1 (Protocol 1). The Bill amounts to a deprivation and not a control of property rights. It goes beyond what is necessary to achieve a legitimate objective (animal welfare) and is therefore a disproportionate interference. It is our understanding that legislation passed by the Senedd must be compatible with Convention rights. We would note that the prohibition on fur farming in 2000 paid compensation even though as a sovereign body the United Kingdom Parliament can in principle set aside ECHR/Human Rights Act requirements. Such is not the case for the devolved parliaments. Any interference with ECHR protected rights must be the minimum necessary to achieve a legitimate objective. Having reviewed the evidence and the options between status quo, statutory regulation and a ban, we do not believe a ban can be justified but there is a strong case for regulation.

We would also note that a public petition representing only about 1% of the Welsh population, even assuming all signatories were Welsh residents, coupled with a spurious ethical argument are not an adequate basis for legislation as proposed. We would urge the Welsh Government to reconsider this proposal starting from animal welfare, not ideology and party-political necessity.

PGRWB 03 GREY2K USA Worldwide

Ymateb gan | Response from: GREY2K USA Worldwide

1. What are your views on the general principles of the Bill, and whether there is a need for legislation to deliver the stated policy intention?

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

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

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

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

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

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

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

2. What are your views on the terms used in the Bill, whether defined or not? In particular, are they workable and will they deliver the stated policy intention?

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

3. What are your views on the provisions set out in sections 1 – 3 and Schedule 1 of the Bill - Prohibition of Greyhound Racing? In particular, are the provisions workable and will they deliver the stated policy intention?

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

4. What are your views on the provisions set out in section 4 and Schedule 2 of the Bill - Enforcement? In particular, are the provisions workable and will they deliver the stated policy intention?

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

5. What are your views on the provisions set out in sections 5- 6 of the Bill – General? In particular, are the provisions workable and will they deliver the stated policy intention?

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

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

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

7. How appropriate are the powers in the Bill for Welsh Ministers to make subordinate legislation, as set out in Chapter 5 of Part 1 of the Explanatory Memorandum?

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

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

The consequence which of course must be given the utmost consideration is to the welfare of racing greyhounds, and while advocates for racing will argue that an end to greyhound racing could impact negatively on their welfare, we know from experience that suitable transitional arrangements, together with engagement with welfare

organisations can mitigate any risks. We believe that the timescale outlined in the Bill will ensure there are no unintended consequences from an animal welfare perspective.

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

9. What are your views on the Welsh Government's assessment of the financial implications of the Bill, as set out in Part 2 of the Explanatory Memorandum?

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

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

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

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

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

PGRWB 04 Alison Littlejohn

Ymateb gan | Response from: Alison Littlejohn

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?

I strongly support the **Prohibition of Greyhound Racing (Wales) Bill** and believe the ban should take effect **within 12 months of the legislation coming into force**.

I fully agree with the following points that have been put forward by the League Against Cruel Sports.

The welfare sector is ready: The Wales Greyhound Partnership (WGP), made up of nine animal welfare charities, have demonstrated they have the capacity to safely rehabilitate and rehome all affected dogs within a year.

- The WGP has the capacity to rehabilitate and rehome up to 258 dogs. With an average rehoming time of just two months, and 120 greyhounds successfully rehomed since its formation, the partnership has clearly demonstrated that it is highly possible to rehome dogs affected by the ban in a significantly shorter timeframe than that currently proposed in the legislation.
- In New Zealand, in the penultimate year of racing (2024/2025) before the country's own ban takes effect, [injuries to greyhounds rose sharply](#): more than 800 dogs were injured, including 114 broken bones, and 17 deaths, making it the deadliest year for greyhounds since the industry was placed on notice. This demonstrates that racing can often intensify when under threat, and Wales must work to prevent the same.
- A clear, firm end date gives both the industry and rescue groups time to prepare responsibly while protecting dogs from further harm.
- It is important that the penalties under the legislation act as a strong deterrent to prevent racing from continuing illegally, and that the law is flexible to apply to individuals involved – including trainers and owners of any greyhound raced or trialed in Wales, as well as track operators and organisers.

Please take part to help ensure the ban is fully implemented within 12 months of the Act coming into force, so Wales can protect dogs from further suffering and lead the way as the first UK nation to end greyhound racing for good.

PGRWB 05 Les Penry

Ymateb gan | Response from: Les Penry

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?

I am writing to express my strong support for the Prohibition of Greyhound Racing (Wales) Bill and to urge that the ban takes effect within 12 months of the legislation coming into force. Allowing greyhound racing to continue until 2030 is far too long. Each additional year means more dogs will be bred, raced, injured, or killed, placing greater pressure on rescue and rehoming organisations.

The welfare sector is ready. The Wales Greyhound Partnership (WGP), comprised of nine animal welfare charities, has shown they have the capacity to safely rehabilitate and rehome all affected dogs within a year. The WGP can rehabilitate and rehome up to 258 dogs, with an average rehoming time of just two months. Since its formation, the partnership has successfully rehomed 120 greyhounds, clearly demonstrating the feasibility of rehoming dogs affected by the ban in a significantly shorter timeframe than currently proposed in the legislation.

Looking at New Zealand as an example, in the penultimate year of racing (2024/2025) before the country's own ban takes effect, injuries to greyhounds rose sharply: over 800 dogs were injured, including 114 broken bones and 17 deaths, making it the deadliest year for greyhounds since the industry was placed on notice. This demonstrates that racing can often intensify when under threat, and Wales must work to prevent the same situation.

A clear, firm end date gives both the industry and rescue groups time to prepare responsibly while protecting dogs from further harm. It is important that the penalties under the legislation act as a strong deterrent to prevent racing from continuing illegally and that the law is flexible to apply to individuals involved, including trainers and owners of any greyhound raced or trialled in Wales, as well as track operators and organisers.

Please take part to help ensure the ban is fully implemented within 12 months of the Act coming into force, so Wales can protect dogs from further suffering and lead the way as the first UK nation to end greyhound racing for good.

Thank you for your attention and consideration.

PGRWB 06 Diane Lewis

Ymateb gan | Response from: Diane Lewis

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?

I really hope greyhound racing will finally be prohibited in Wales.

These beautiful gentle creatures have no place in a racing track.

Please make sure the ban comes into effect as soon as such legislation comes into law.

PGRWB 07 Robert Williams

Ymateb gan | Response from: Robert Williams

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?

I strongly support the **Prohibition of Greyhound Racing (Wales) Bill** and believe the ban should take effect **within 12 months of the legislation coming into force**.

Allowing racing to continue until 2030 is far too long. Each extra year means more dogs will be bred, raced, injured, or killed, and put greater pressure on rescue and rehoming organisations.

PGRWB 08 Christine Evans

Ymateb gan | Response from: Christine Evans

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?

- Wales has been the trendsetter in various environmental issues in recent years. Regarding the greyhound racing ban, this is another example of how Wales could shine. Please consider the fact that using animals for human entertainment and money is morally wrong.
- I strongly support the **Prohibition of Greyhound Racing (Wales) Bill** and believe the ban should take effect **within 12 months of the legislation coming into force**.
- Allowing racing to continue until 2030 is far too long. Each extra year means more dogs will be bred, raced, injured, or killed, and put greater pressure on rescue and rehoming organisations.
- The welfare sector is ready: The Wales Greyhound Partnership (WGP), made up of nine animal welfare charities, have demonstrated they have the capacity to safely rehabilitate and rehome all affected dogs within a year.
- The WGP has the capacity to rehabilitate and rehome up to 258 dogs. With an average rehoming time of just two months, and 120 greyhounds successfully rehomed since its formation, the partnership has clearly demonstrated that it is highly possible to rehome dogs affected by the ban in a significantly shorter timeframe than that currently proposed in the legislation.
- In New Zealand, in the penultimate year of racing (2024/2025) before the country's own ban takes effect, injuries to greyhounds rose sharply: more than 800 dogs were injured, including 114 broken bones, and 17 deaths, making it the deadliest year for greyhounds since the industry was placed on notice. This demonstrates that racing can often intensify when under threat, and Wales must work to prevent the same.
- A clear, firm end date gives both the industry and rescue groups time to prepare responsibly while protecting dogs from further harm.
- It is important that the penalties under the legislation act as a strong deterrent to prevent racing from continuing illegally, and that the law is flexible to apply to individuals involved – including trainers and owners of any greyhound raced or trialled in Wales, as well as track operators and organisers.

Thank you for considering my views.

PGRWB 09 Jane Hurley

Ymateb gan | Response from: Jane Hurley

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?

I entirely support the Bill for Prohibition of grey hound racing.

It ought to come into force asap and definitely within a twelve month.

Another five years is unthinkable for yet more suffering of animals.

It's unethical.

Please ensure the ban comes in as soon as possible, and is able to be enforced using penalties.

PGRWB 10 Dr Huw Jones Jenkins

Ymateb gan | Response from: Dr Huw Jones Jenkins

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?

- Greyhound racing is, quite simply, cruel. I strongly support the **Prohibition of Greyhound Racing (Wales) Bill** and believe the ban should take effect **within 12 months of the legislation coming into force**.
- Allowing racing to continue until 2030 is far too long. Each extra year means more dogs will be bred, raced, injured, or killed, and put greater pressure on rescue and rehoming organisations.
- The welfare sector is ready: The Wales Greyhound Partnership (WGP), made up of nine animal welfare charities, have demonstrated they have the capacity to safely rehabilitate and rehome all affected dogs within a year.
- The WGP has the capacity to rehabilitate and rehome up to 258 dogs. With an average rehoming time of just two months, and 120 greyhounds successfully rehomed since its formation, the partnership has clearly demonstrated that it is highly possible to rehome dogs affected by the ban in a significantly shorter timeframe than that currently proposed in the legislation.
- In New Zealand, in the penultimate year of racing (2024/2025) before the country's own ban takes effect, [injuries to greyhounds rose sharply](#): more than 800 dogs were injured, including 114 broken bones, and 17 deaths, making it the deadliest year for greyhounds since the industry was placed on notice. This demonstrates that racing can often intensify when under threat, and Wales must work to prevent the same.
- A clear, firm end date gives both the industry and rescue groups time to prepare responsibly while protecting dogs from further harm.
- It is important that the penalties under the legislation act as a strong deterrent to prevent racing from continuing illegally, and that the law is flexible to apply to individuals involved – including trainers and owners of any greyhound raced or trialled in Wales, as well as track operators and organisers.

PGRWB 11 Cut the Chase Coalition

Ymateb gan | Response from: Cut the Chase Coalition

About Cut the Chase

The Cut the Chase Coalition comprises Blue Cross, Dogs Trust, Greyhound Rescue Wales, Hope Rescue and the RSPCA. Our coalition has been working towards an end to greyhound racing in Wales since 2022 to protect the relevant dogs from injury and death. However, as individual members, we have been working for many years to improve the welfare of racing greyhounds in Wales.

As a coalition, we very much welcome the legislation as it brings us ever closer to ending greyhound racing in Wales. In its current form, the Bill will prohibit the commercial racing of greyhounds while also preventing the training and trialling of greyhounds for racing purposes at stadiums and other similar venues. This is particularly positive as it prevents greyhounds from being schooled in Wales.

We also welcome the opportunity to submit evidence to the Culture, Communications, Welsh Language, Sport, and International Relations Committee's consultation on the prohibition of greyhound racing in Wales. The information enclosed in this response provides an overview of the changes that we would like to see to the proposed legislation ensuring the welfare of greyhounds in Wales is safeguarded.

The general principles of the Prohibition of Greyhound Racing (Wales) Bill and whether there is a need for legislation to deliver the Bill's stated policy objective, which is to prohibit greyhound racing in Wales.

The Cut the Chase Coalition agrees with the general principles of the Bill and that there is a clear need for legislation to deliver the Bill's stated policy objective to prohibit greyhound racing in Wales. We have significant welfare concerns for racing greyhounds throughout their lives and when their racing career ends.

There are a myriad of welfare issues reported to affect greyhounds at every stage of their life cycle. To give some examples, these include inadequate socialisation and habituation of puppies as well as tattooing of puppies for identification during rearing, poor environments during schooling, trialling and racing, inappropriate transportation at all stages, presence of dental disease and impacts of extreme weather.

While the proposed legislation is focused on greyhound racing in Wales where dogs are typically racing or leaving the industry, it will also impact upon trialling and schooling which also pose welfare issues which cannot be ignored.

The inherent danger to the dogs by participating in greyhound racing GBGB's own figures show that over 4,000 greyhounds died and over 35,000 injuries were recorded as a result of licensed greyhound racing between 2018 and 2024, with additional dogs injured on independent tracks.

- Significant welfare challenges for greyhounds at all stages of the dogs' lives, including during their racing career and once their career is over.

- Some of the dogs used in racing are kept in poor, barren conditions, with little if any enrichment and fed a poor diet.
- The general health of dogs including the number and severity of injuries sustained during racing.
- Disjointed and ineffective regulation within the sector and across the different nations within which racing takes place
- A lack of transparency regarding industry practices and enforcement of regulatory standards, including records of racetrack injuries to greyhounds and checks for banned substances.
- An inconsistent and inadequate funding stream

Focusing on racing itself, the industry's own statistics provide the most reliable evidence as to the inherent risk of injury and death posed and why an end to greyhound racing is the only way to safeguard their welfare. According to the latest statistics from GBGB, published in June 2025, 346 dogs involved in racing died for reasons other than natural causes/illness in 2024, while 3,809 injuries were also recorded.¹ For the first time since the publication of these statistics began, the number of track fatalities increased, with 123 dogs having died at tracks licensed by GBGB - up from 109 the previous year.² While this data covers tracks in both Wales and England - with GBGB regulating 19 at present - they are the first set of statistics that cover a full year of racing at the Valley Greyhound Stadium in Ystrad Mynach which became regulated by GBGB in 2023.³⁴ Although it is worth noting that where data is provided by the industry, e.g. injury, death and rehoming figures, there has been a change in the categories used to compile annual statistics which makes comparisons of change or progress over multiple years very challenging. This clearly demonstrates a lack of transparency from the industry when it comes to the publication of these statistics.

We also know from Hope Rescue's Amazing Greys report prior to the Valley Stadium being licensed by GBGB, between 2018 and 2021, that the Amazing Greys project helped over 200 racing greyhounds whose owners and/or trainers had links with the Valley racetrack. Of these dogs, 40 endured serious, career ending injuries such as severe fractures needing significant veterinary treatment, amputation or orthopaedic repair.⁵ There also was significant evidence gathered by organisations submitting evidence to the Senedd's Petitions Committee in 2022 following its consultation seeking views on a ban on greyhound racing in Wales. The petition and the respective consultation collated data

¹ Greyhound Board of Great Britain (2025) Injury and Retirement data. Available at: <https://www.gbgb.org.uk/welfare-care/injury-and-retirement-data/> Accessed 6th October 2025.

² Greyhound Board of Great Britain (2025) Injury and Retirement data. Available at: <https://www.gbgb.org.uk/welfare-care/injury-and-retirement-data/> Accessed 6th October 2025.

³ Greyhound Board of Great Britain (2025) Our Racecourses. Available at: <https://www.gbgb.org.uk/racing/race-courses/> Accessed 6th October 2025.

⁴ Greyhound Star. (2023) Wales's Valley Stadium Granted GBGB Licence. Available at: Wales's Valley Stadium Granted GBGB Licence - Greyhound Star | News from the Greyhound Industry. Accessed 6th October 2025

⁵ Hope Rescue (2022) Amazing Greys. Available upon request.

and evidence of poor welfare within greyhound racing.⁶ These different sources of evidence and case studies within Amazing Greys provide irrefutable evidence of poor welfare within greyhound racing and that racing around oval tracks at speeds of around 40mph is inherently dangerous, with serious consequences for dog welfare.

The terms used in the Bill, whether defined or not. In particular, are they workable and will they deliver the stated policy intention.

The Cut the Chase Coalition believes in its current form, the Bill will prohibit the commercial racing of greyhounds around tracks at stadiums and similar venues while, by definition, also outlawing training and trialling of greyhounds around tracks for racing purposes as this is also classed as 'greyhound racing'.

This is particularly positive as the schooling of greyhounds around tracks for racing purposes carries the same inherent risks as racing on a commercial basis. The proposed legislation currently covers the operator or track/similar venue and any persons involved in organising greyhound racing. To mitigate any unintended consequences that could arise such as the facilitation of illegal racing, it is highly important that the legislation is applicable to individuals as well as track operators/owners and that this is specified in the Explanatory Memorandum. This would help ensure that the offence is a deterrent to everyone involved, not just the organisers.

Positively, the passing of this Bill in 2026 could see racing end in Wales by the 1st of April 2027 and our coalition is highly supportive of such action. However, in its current form, its provisions may also see greyhound racing continue here until April 2030. We do not believe that such a long timeframe is necessary as demonstrated through the work of the Wales Greyhound Partnership (WGP).

The WGP comprises nine animal welfare organisations - including our coalition's members - and at this current time has the capacity to rehome up to 258 dogs, over an average of a two month period.⁷ As we are actively preparing to rehome the dogs affected, we question whether such a long timeframe will be necessary and look forward to working with the Implementation Group to deliver an end to greyhound racing sooner rather than later.

With an average length of time for rehoming of about two months and 120 dogs rehomed since its conception this year, the Partnership has clearly demonstrated that it is highly possible to rehome dogs affected by the ban in a much shorter time period than the legislation would allow for.⁸ Furthermore, this window is much greater than that provided for other tracks closed by the industry. For example, the closure of Swindon was announced in March 2025, with racing to cease at the end of December 2025.⁹

⁶ Petitions Committee (2022) Ban on Greyhound Racing in Wales. Available at <https://business.senedd.wales/mglIssueHistoryHome.aspx?lId=38716&Opt=0>. Accessed 6th October 2025

⁷ Wales Greyhound Partnership (2025) Internal Rehoming Data.

⁸ Wales Greyhound Partnership (2025) Internal Rehoming Data.

⁹ BBC News (2025) No more greyhound racing for town stadium. Available at: <https://www.bbc.co.uk/news/articles/c3w13ggvq5d0>. Accessed 6th October 2025

Any potential barriers to the implementation of the Bill's provisions, and whether the Bill and accompanying Explanatory Memorandum and Regulatory Impact Assessment take adequate account of them.

We believe there are no barriers to the implementation within the Bill's provisions or other documents outlined in the questions. The only concern the Coalition has is that the Bill only makes organisers and operators liable for offences under the Bill which could prove difficult to determine. A possible solution, as is the case for hare coursing, could be to extend the offence to participants, attendees or facilitators which would include owners and trainers.

Whether there are any unintended consequences arising from the Bill.

The Cut the Chase Coalition believes that this Bill will prohibit greyhound racing and deliver positive changes to the welfare of racing greyhounds. We are proud that Wales will be the first UK nation to prohibit greyhound racing. We believe it is too early to be able to judge whether this Bill has unintended consequences but we have a unique opportunity to review the legislation, as set out in the Explanatory Memorandum, no later than five years after it is implemented, this will provide the opportunity to tweak the legislation if needed to fix any unintended consequences. However, it is important that any review conducted has means of collecting data on the impacts of the legislation, such as number of dogs rehomed, and the number of convictions under the new legislation - between the implementation date and review.

The Welsh Government's assessment of the financial and other impacts of the Bill as set out in Part 2 of the Explanatory Memorandum.

The Coalition agrees with the Welsh Government's assessment of the Financial and other impacts of the Bill as set out in Part two of the Explanatory Memorandum. We do not see any long term implications on the Welsh Government and Local Authorities who will be enforcing the legislation, as Wales only has one track based in Caerphilly County Borough Council. No other venue will have the appropriate facilities or equipment to host and organise an event.

We also agree with the Welsh Government's assessment, given during the Ministerial evidence session to the Committee in October 2025, that it would be very obvious if someone was organising an illicit race. This is because of the size of greyhound racing tracks ranging between 300-1,000 yards, the infrastructure needed to facilitate a similar experience would be highly difficult to replicate on an illegal basis. We also know that the Greyhound racing industry depends on income generated through live streaming for the purposes of gambling, which they will be unable to do, when the "sport" is prohibited. This means it would not be feasible to put in place the infrastructure required for live streaming for illicit racing which removes the commercial incentive racing - making it unviable and not worth the risk.

The appropriateness of the power in the Bill for Welsh Ministers to make subordinate legislation (as set out in Part 1: Chapter 5 of the Explanatory Memorandum).

Matters relating to the competence of the Senedd including compatibility with the European Convention on Human Rights.

Cut the Chase is focused on animal welfare and we do not take a view on this question.

The balance between the information contained on the face of the Bill and what is left to subordinate legislation.

Cut the Chase is focused on animal welfare and we do not take a view on this question.

Any matter related to the quality of the legislation.

We believe that this legislation will deliver its stated aim of ending greyhound racing in Wales, which is hugely welcome as a positive step forward for the welfare of racing greyhounds. As a Coalition we are very happy with the quality of this legislation. It is obvious to us that the Bill's drafting team has consulted with other nations within the UK, namely Scotland, and has built upon this piece of legislation to deliver an effective end to greyhound racing in Wales as outlined by the Deputy First Minister for Wales and Civil Servants in Wales in the Ministerial evidence session held by the Committee in October 2025.

Also if we look internationally, we can see that there are other pieces of legislation that are trying to achieve the same outcome, namely in Tasmania and New Zealand. New Zealand announced its plans to ban greyhound racing shortly before the Welsh Government, with its government having recently confirmed that it will legislate on the closure of the greyhound racing industry by July 31st 2026.¹⁰ In August 2025, Tasmania also confirmed its intention to phase out the activity, with its premier having recently vowed to end greyhound racing in the state by 2029.¹¹

This demonstrates that Wales and the Welsh Government are moving in lockstep with public opinion, and the international movement towards protecting the welfare of racing greyhounds.^{12,13} The social licence once afforded to greyhound racing has eroded and the public do not want it to continue. For example, in the run up to the deadline for this licensing consultation, more than 19,400 people signed the RSPCA's latest open letter calling for an end to greyhound racing in Wales. The most recent polling undertaken by RSPCA Cymru in 2024 also shows that 77% of people either fully support (52%) or somewhat support (25%) the Cut the Chase coalition's calls for such action from the Welsh Government.

Any other matter related to the constitutional or other implications of the Bill.

Although the Cut the Chase Coalition is focused on animal welfare we do welcome the Welsh Government's plan to engage with workers impacted by this legislation and its commitment to engage with the Local Authority and owners of the track as part of the

¹⁰ Radio New Zealand (2025) Finishing line in sight for greyhound racing. Available at: <https://www.rnz.co.nz/news/political/570512/finishing-line-in-sight-for-greyhound-racing>. Accessed 6th October 2025

¹¹ Guardian (2025) Tasmanian premier vows to end greyhound racing as he woos crossbench to back minority government. Available at: <https://www.theguardian.com/news/2025/aug/10/tasmanian-premier-vows-to-end-greyhound-racing-as-he-woos-crossbench-to-back-minority-government>. Accessed 6th October 2025

¹² 65% of respondents agreed that the Welsh Government should introduce a phased ban on greyhound racing within the Licensing of animal welfare establishments, activities and exhibits Consultation.

¹³ Welsh Government (2025) Licensing of animal welfare establishments, activities and exhibits. Available at: <https://www.gov.wales/licensing-animal-welfare-establishments-activities-and-exhibits>. Accessed 6th October 2025

Implementation Group to talk about how the land can be repurposed after the implementation of this legislation.

PGRWB 12 Manuela Vogler

Ymateb gan | Response from: Manuela Vogler

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?

I am aware that a ban on greyhound racing is being considered and I am writing to express my support for banning this cruel practice. I strongly oppose any cruel “sports” of which greyhound racing is certainly one. As a society we should ask ourselves whom this is benefiting most. The answers we will find are sobering: bookies and the whole shady betting industry, and dog breeders who know fine well that these dogs will be abused. The term “sport” is not appropriate. This activity is based on animal cruelty and gambling. This has no place in a civilised society. It's a disgusting activity and should be banned. This must stop now and not in 5 years.

I strongly support the Prohibition of Greyhound Racing (Wales) Bill.

PGRWB 13 Betting and Gaming Council

Ymateb gan: Y Cyngor Betio a Hapchwarae | Response from: Betting and Gaming Council

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?

The Betting and Gaming Council (BGC) represents over 90% of the UK's regulated betting and gaming sector (excluding lotteries). Our sector supports 109,000 jobs, contributes £6.8 billion in economic value, and delivers £4 billion in tax revenue to the Exchequer annually. Our mission is to set world class standards to ensure an enjoyable, fair and safe betting experience for all of our customers.

As part of our mission, the BGC has introduced 20 Codes and 100 measures which our members abide by as a condition of membership to drive up standards and to support a sustainable and safer gaming environment for all. It is in this vein, the BGC believes that robust regulation and not prohibition is the most effective safeguard to welfare which also considers economic and social benefits. The BGC notes that the Greyhound Board of Great Britain (GBGB) provides an extremely robust framework to ensure the welfare and integrity of the sport.

Whilst we acknowledge and respect the Welsh Government's autonomy in this area, we note that banning of greyhound racing is fundamentally opposed to UK government policy. 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."

We support these comments by the Secretary of State, in that greyhound racing is a significant net contributor to the UK, not just in terms of economics but also the enjoyment it brings to fans of the sport, and the many people employed around the UK. The GBGB have a robust welfare system in place, ensuring that every greyhound participating within the sport receives the highest levels of care, both during their career and in retirement. The fact is, that banning greyhound racing will have a negative impact on welfare, not a positive one.

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 policy intention of the Bill is to prohibit greyhound racing in Wales, which will make it an offence to:

- a) Operate a stadium or similar venue in Wales and use it, or knowingly permit it to be used, for greyhound racing; and
- b) Be involved in organising greyhound racing in Wales.

If enacted, this Bill will deliver the stated policy intention. However, the BGC makes the following observation:

The Bill does not fully address the welfare of greyhounds nor the material threat that unregulated, illegal racing may be allowed to flourish in the absence of a regulated body presiding over the sport.

In progressing with this regulation, the Senedd must be confident that it has fully understood the welfare implications for greyhounds currently involved in racing within Wales and the wider impacts relating to a blanket ban. We defer to the GBGB for their detailed analysis of this.

3. What are your views on the provisions set out in sections 1 – 3 and Schedule 1 of the Bill -Prohibition of Greyhound Racing? In particular, are the provisions workable and will they deliver the stated policy intention?

The provisions set out in sections 1-3 are:

Prohibition of greyhound racing

(1) A person commits an offence if a person—

(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.

(2) A person guilty of an offence under subsection (1) is liable on summary conviction to a fine.

Interpretation

In this Act—

(a) “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);

(b) “operator” (in relation to a stadium or similar venue) means—

(i) the owner of the stadium or venue;

(ii) the person, other than the owner, with overall responsibility for the operation of the stadium or venue or, if that person is not present in the United Kingdom, the person in the United Kingdom responsible for the operation of the stadium or venue. Offences by bodies corporate etc.

Schedule 1 makes provision about offences under section 1 committed by bodies corporate, partnerships and unincorporated associations other than partnerships.

Schedule 1 of the Bill relates to Offences by Corporate Bodies detailing the commission of offences and proceedings.

The policy intention is to ban greyhound racing. Should the Bill be enacted sections 1-3 and Schedule 1 of the Bill will deliver the stated policy intention. However, the BGC makes the following observations:

Section 1 of the Bill will likely jeopardise the welfare of greyhounds in Wales as the regulated body of Greyhound racing will no longer be able to provide resources, care and support to Greyhounds during their lifetime.

Section 2 of the Bill includes the training of greyhounds which will likely result in Welsh based Greyhounds travelling intercountry in order to train and compete, significantly impacting the greyhounds and increasing their risk of injury.

The BGC has no comments on Section 3.

The BGC has no 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?

Section 4 relates to enforcement of prohibition of greyhound racing. Section 2 details these powers.

The policy intention is to ban greyhound racing. Should the Bill be enacted Schedule 2 will deliver the stated policy intention. The BGC again reiterates that robust regulation over prohibition is the best course of action and in the best interest for the welfare of greyhounds.

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?

The provisions set out in sections 5-6 are:

Coming into force

(1) This section and section 6 come into force on the day after the day on which this Act receives Royal Assent.

(2) The remaining provisions of this Act 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.

Title

This Act may be referred to as—

(a) the Prohibition of Greyhound Racing (Wales) Act 2026, or

(b) Deddf Gwahardd Rasio Milgwn (Cymru) 2026.

The policy intention is to ban greyhound racing. Should the Bill be enacted Schedule 2 will deliver the stated policy intention no sooner than 1st April 2027 and no later than 1 April 2030. However, the BGC makes the following observations: Should this Bill be enacted, there must sufficient resources available to rehome the inevitably large number of greyhounds who will no longer continue racing. Under the current regulated system, the GBGB is working towards a sustainable scheme where the amount of greyhounds

entering racing is equal to those being rehomed once retiring from the sport. This Bill will undoubtedly disrupt this progress and unduly impact the welfare of greyhounds.

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

Sufficient care, resources and planning must be taken into account with regards to the welfare of the greyhounds if this bill is enacted.

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)?

The BGC has no comments on Chapter 5 of Part 1 of the Explanatory Memorandum.

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

As previously set out, there is a material and significant risk towards the welfare of greyhounds. There is uncertainty of rehoming and sufficient care towards greyhounds who will no longer be under the protection of the GBGB. There is also a risk of unlicensed, illegal greyhound racing which will primarily negatively affect greyhounds, but will also undermine the regulated market, put consumers at risk, as well as incur financial and time resources to police and enforce against.

The Senedd must also take into account the impact on the local economy due to the closing of the track. We defer to submissions by the track, GBGB and others with regard the financial detail of this.

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?

The financial impacts on the owners of the Valley Stadium is not fully detailed in the Explanatory Memorandum. The Memorandum states that employment would be adversely affected both on the track and through trainers. All negative employment impacts are stated to be small in the context of the general labour market churn in Wales.

It is the view of the BGC that more thorough and conclusive analysis should have been carried out to provide an accurate depiction of the true impact on employment losses to the track and local community. Furthermore, those who are trainers are highly skilled and have specialised knowledge, by removing this sector, these people cannot simply transfer jobs in the local community. This would force many to relocate or learn new skills, the cost of which is significant and not accounted for in the memorandum.

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

The BGC would respectfully urge Welsh Government to reconsider this Bill. The improvement of Greyhound welfare can be achieved through sensible and robust regulation with no undue impact on the welfare of greyhounds, local employment, the economy and the sport itself (which is enjoyed responsibly by many). If the Government believes that the sport is currently contrary to the public interest or the welfare of greyhounds; the starting point should be to raise standards and not to put a blanket ban on the sports.

PGRWB 14 Individual

Ymateb gan: Unigolyn | Response from: Individual

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?

I strongly support the Prohibition of Greyhound Racing (Wales) Bill. This ban should take effect within 12 months of the legislation coming into force. Waiting for another five years is far too long. The Wales Greyhound Partnership are able to rehome all affected dogs within a year. Dog racing is a cruel practice a society shouldn't engage in. It's time to stop this now rather than procrastinating things for years on end.

PGRWB 15 Lorraine Czaja

Ymateb gan | Response from: Lorraine Czaja

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?

- I strongly support the Prohibition of Greyhound Racing (Wales) Bill and believe the ban should take effect within 12 months of the legislation coming into force.
- Allowing racing to continue until 2030 is far too long. Each extra year means more dogs will be bred, raced, injured, or killed, and put greater pressure on rescue and rehoming organisations.
- The welfare sector is ready: The Wales Greyhound Partnership (WGP), made up of nine animal welfare charities, have demonstrated they have the capacity to safely rehabilitate and rehome all affected dogs within a year.
- The WGP has the capacity to rehabilitate and rehome up to 258 dogs. With an average rehoming time of just two months, and 120 greyhounds successfully rehomed since its formation, the partnership has clearly demonstrated that it is highly possible to rehome dogs affected by the ban in a significantly shorter timeframe than that currently proposed in the legislation.
- In New Zealand, in the penultimate year of racing (2024/2025) before the country's own ban takes effect, injuries to greyhounds rose sharply: more than 800 dogs were injured, including 114 broken bones, and 17 deaths, making it the deadliest year for greyhounds since the industry was placed on notice. This demonstrates that racing can often intensify when under threat, and Wales must work to prevent the same.
- A clear, firm end date gives both the industry and rescue groups time to prepare responsibly while protecting dogs from further harm.
- It is important that the penalties under the legislation act as a strong deterrent to prevent racing from continuing illegally, and that the law is flexible to apply to individuals involved – including trainers and owners of any greyhound raced or trialled in Wales, as well as track operators and organisers.

Please take part to help ensure the ban is fully implemented within 12 months of the Act coming into force, so Wales can protect dogs from further suffering and lead the way as the first UK nation to end greyhound racing for good.

PGRWB 16 Ken Needham

Ymateb gan | Response from: Ken Needham

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?

I would like to declare my support in the banning of Greyhound racing.

I believe that these animals are treated as commodities to make money, serious injury is common during races, cruelty is rife, and when the dogs are either not performing or passed performing, discarded in some inhuman way.

Please ensure this ends as soon as possible.

PGRWB 17 Ruth Joseph

Ymateb gan | Response from: Ruth Joseph

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?

I'm disgusted that in these enlightened times that greyhounds are still being used for cheap entertainment and profit for some as a so called industry!! These poor animals are horribly treated, their nutrition is appalling and so many fracture bones and are emotionally disturbed.

While most end up being killed or are maimed at the end of a very short life. This cannot be right and needs to stop.

You have the power in your hands to change the lives of so many dogs who deserve a life of love and contentment with owners who care for them not numbers on a track.

Please use your powers and stop this ghastly industry once and for all.

PGRWB 18 Alain Thomas, Trustee, Greyhound Rescue Wales

Ymateb gan: Alain Thomas, Ymddiriedolwr, Achub Milgwn Cymru | Response from: Alain Thomas, Trustee, Greyhound Rescue Wales

Working to secure voluntary improvements and statutory regulation to protect the welfare of greyhounds in Wales – a timeline.

Context

In a hearing of the committee on 14.10.25, a committee member said they were not aware of efforts by welfare organisations to work with the industry and Welsh Government in Wales to secure welfare improvements through voluntary initiatives or regulation. I have been involved in this work since 2001 and this document summarises a timeline of the key events. The pause in efforts between 2009 and 2018 explains why the member concerned may not have been aware of this work as that time period includes his term of tenure as the Minister responsible for Animal Welfare.

2001 The start of work to improve greyhound welfare in Wales.

Greyhound Rescue Wales started work in 1993. In its early years the organisation took into its care many greyhounds who were literally being thrown onto the streets once their racing days were over. Some were handed over by members of the public who had found them, others were taken into local authority pounds and came to GRW from there.

GRW knew the abandonment of greyhounds was a serious welfare problem but needed to evidence it. The opportunity came with the establishment of the National Assembly for Wales.

In 2001, GRW was invited to make a presentation at the first meeting of the All-Party Group for Animal Welfare, at the recently established National Assembly for Wales.

This presentation led to the establishment of the Wales Greyhound Forum which brought together Dogs Trust, RSPCA Cymru, and GRW. The Forum was chaired by Assembly Member Lorraine Barret and conducted crucial research which found that 139 abandoned greyhounds had been handed in to local authority pounds in Wales in a single year. The findings were published by the National Assembly for Wales All Party Group for Animal Welfare and Greyhound Rescue Wales in a report: “The fates of former racing greyhounds and working lurchers in Wales¹⁴”. This report estimated that hundreds of greyhounds would meet what it called “unacceptable fates” in Wales each year at the end of their racing career. These fates included abandonment or death.

¹⁴ The fate of former racing greyhounds and working lurchers in Wales, the National Assembly for Wales All Party Group for Animal Welfare in association with Greyhound Rescue Wales, 2001.

2002 -2004 Attempts to engage with the Welsh Tracks

There were three independent tracks in Wales at this time: Bedwellty, Swansea and Valley. Because the industry was small in scale Wales Greyhound Forum members believed welfare improvements could be achieved by engaging directly with the three tracks. The tracks were therefore invited to send representatives to meet with the Forum members to work for welfare improvements. Only the Swansea track sent a representative, it therefore proved impossible to make any progress.

2004 The tragedy of Last Hope.

On May 2nd 2004, a black greyhound called “Last Hope” was found on a mountainside near Caerphilly. He had been shot in the head by a bolt gun and both his ears had been cut off to prevent him being identified through his ear tattoos. This event sent shock waves through people involved in animal welfare and in greyhound racing in Wales. GRW worked with the RSPCA, Gwent Police, and people involved in greyhound racing to identify all the people involved in Last Hope’s death and successfully prosecuted the man who killed him.

Last Hope’s death had many consequences.

- For many years after Last Hope’s death greyhound owners and trainers would come to GRW to ask us to rehome their dogs, few had done so previously
- As a tribute to Last Hope and to help other dogs whose life was at immediate risk GRW set up the “Last Hope Fund” which has since paid for life saving treatment for many injured greyhounds.
- The death of Last Hope also moved Vanessa Waddon to become actively involved in dog welfare and the charity she set up is named after him.
- Another consequence of direct relevance to the issue of working with the Welsh tracks is that following Last Hope’s death they finally engaged with the Wales Greyhound Forum.

Within 24 hours of Last Hope’s death GRW representatives had visited all three tracks in person and all three all three had signed a pledge to work with welfare organisations to make sure nothing like this happened again.

2004-2007 The first greyhound welfare code of practice for Wales

Track and welfare representatives worked together for several years under the chairmanship of Lorraine Barrett AM. This work culminated in the production of a set of draft regulations to protect greyhounds in Wales; “A better bet for greyhounds”¹⁵, which was launched at what is now the Senedd on 21.11.2007.

¹⁵ A Better Bet for Greyhounds, a submission to Welsh Assembly Government in view of proposals to introduce regulations and a code of practice for greyhounds racing in Wales, Wales Greyhound Forum 2008.

Discussions then began with Welsh Government about implementation of the regulations. At first these were promising and because of this and the fact that draft Welsh regulations were more comprehensive than the Welfare of Greyhounds legislation being developed in England¹⁶, welfare organisations focused on securing the implementation of “A Better Bet for Greyhounds” rather than pressing for Wales to adopt the English legislation.

2007-2009 Track closures

By 2007 one of the three tracks (Bedwellty) had closed for economic reasons and in November 2009, Swansea, which was widely considered to be Wales’ leading track at the time, closed following the prosecution under the Animal Welfare Act, of an individual working at the track. The offence related to the conditions in the kennels where the greyhounds were kept.

GRW had anticipated the closure of Swansea and meticulously planned a concerted effort involving partner organisation including Dogs Trust and RSPCA Cymru to offer every greyhound who raced at Swansea an immediate rescue place. Over 40 greyhounds were taken in by the partners in the days following the last race.

The experience of taking in greyhounds following the closure of Swansea have informed the work of the current Welsh Greyhound Partnership, established in anticipation of the closure of Valley.

2009 – the end of the first phase of pressing for regulation

The closure of Swansea left only one operational track in Wales, the Valley Stadium at Ystrad Mynach. The reduction in the number of tracks led Welsh Government to decide that the scale of the problem no longer merited legislation and the decision was taken not to turn the draft regulations into law. The timeline of these events also meant that the opportunity to adopt the English regulations was also lost.

Although the remaining track had signed up to the provisions of “A Better Bet for Greyhounds”, it did nothing to implement any of them on a voluntary basis. Nevertheless, GRW and the other welfare organisations decided that it was likely the remaining track would also close soon. For this reason, and because the number of greyhounds needing help had reduced and was therefore more manageable, the welfare organisations decided to suspend efforts to secure regulation.

2018 The start of the second phase: Amazing Greys and the Greyhound Welfare Working Group

¹⁶ Now the “Welfare of Racing Greyhounds Regulations 2010”.

By 2018 it was clear that Valley was unlikely to close in the near future so Greyhound Rescue Wales and Hope Rescue jointly decided to restart efforts to secure welfare improvements in Wales.

2018 – 2021 Amazing Greys.

Hope Rescue set up the Amazing Greys project. The project offered an immediate rescue place to every greyhound leaving the Valley stadium. Its work is well documented in other evidence submitted to the Committee.

2018 – 2022 The Greyhound Working Group

Greyhound Rescue Wales initiated and led Animal Welfare Network Wales' Greyhound Welfare Working Group which included Hope Rescue, RSPCA Cymru, Battersea Dogs and Cats Homes, and the British Veterinary Association to try, once again, to improve the welfare of greyhounds in Wales. The group drew up a "Road Map" which began with efforts to engage with the track and secure voluntary improvements while also working towards statutory regulation. Should these efforts fail, the road map suggested the next step should be to press for a ban.

After some evidence gathering the GWWG's early efforts focused on working with the remaining track to improve welfare. One initiative involved contacting all veterinary practices within a reasonable distance of the track to try and recruit vets willing to attend the track for £100 per race-night. This is much lower than the commercial rate and it was made clear to the vets that the prime motivation of any practice or individual choosing to participate in the project had to be to improve the welfare of the dogs. Sufficient vets were identified who were willing to attend on a rota basis and this offer was made to the track who turned it down as being unaffordable. This response made it clear to GRW that the track had no interest in improving welfare on a voluntary basis.

The Greyhound Welfare Working Group then focused its efforts on producing a new set of welfare regulations for greyhounds in Wales, at the request of Welsh Government, to set out some clear and up to date standards to which the track could be held accountable.

The resultant voluntary code of practice "The welfare of racing greyhounds (Wales)" was published on 29.10.2019¹⁷. It is a detailed document setting out standards covering all aspects of the life of the racing greyhound throughout the greyhound's life cycle.

This code was widely disseminated within the greyhound industry in Wales. Efforts included Amazing Greys volunteers giving to hard copies of the Code personally to the trainers and owners they met while attending race nights.

An addition to the code of practice covering track surfaces was then produced later in 2021.

Despite the extensive dissemination of the code of practice and addendum there was no discernible change in welfare practices affecting greyhounds in Wales.

¹⁷ Voluntary Code of Practice, the Welfare of Racing Greyhounds (Wales), Animal Welfare Network Wales, 2021.

2022 Changes of position and a new alliance. GRW had adopted a neutral position on greyhound racing and tried to work with the racing industry for over 20 years to secure welfare improvements, but nothing had changed. A proposal was therefore submitted to and approved by a Special General Meeting of members in March 2022 to “support the movement to end greyhound racing in Wales”. This marked a fundamental shift in GRW’s position and allowed the organisation to join once more with Hope Rescue who had been leading a campaign to ban greyhound racing in Wales since the end of the Amazing Greys project. Later that year Dogs Trust, the RSPCA and Blue Cross also changed their position and called for a phased end to greyhound racing.

Alain Thomas

Founder and trustee Greyhound Rescue Wales, Former Chair of the AWWNW Greyhound Welfare Working Group, Chair of the Welsh Greyhound Partnership

PGRWB 19 Jenny Lloyd

Ymateb gan | Response from: Jenny Lloyd

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?

Please find below bullet points outlining the great importance of acting as quickly as possible to end the cruel sport of Greyhound racing in Wales. Anyone who truly cares about the welfare of dogs will fully understand that there is no excuse to continue such a barbaric sport for the sole aim of gambling (an activity in itself that causes enormous harm to those involved)

Let Wales be a leader in compassion and help to work towards a kinder world for all animals!

- I strongly support the **Prohibition of Greyhound Racing (Wales) Bill** and believe the ban should take effect **within 12 months of the legislation coming into force**.
- Allowing racing to continue until 2030 is far too long. Each extra year means more dogs will be bred, raced, injured, or killed, and put greater pressure on rescue and rehoming organisations.
- The welfare sector is ready: The Wales Greyhound Partnership (WGP), made up of nine animal welfare charities, have demonstrated they have the capacity to safely rehabilitate and rehome all affected dogs within a year.
- The WGP has the capacity to rehabilitate and rehome up to 258 dogs. With an average rehoming time of just two months, and 120 greyhounds successfully rehomed since its formation, the partnership has clearly demonstrated that it is highly possible to rehome dogs affected by the ban in a significantly shorter timeframe than that currently proposed in the legislation.
- In New Zealand, in the penultimate year of racing (2024/2025) before the country's own ban takes effect, injuries to greyhounds rose sharply: more than 800 dogs were injured, including 114 broken bones, and 17 deaths, making it the deadliest year for greyhounds since the industry was placed on notice. This demonstrates that racing can often intensify when under threat, and Wales must work to prevent the same.
- A clear, firm end date gives both the industry and rescue groups time to prepare responsibly while protecting dogs from further harm

PGRWB 20 The Kennel Club

Ymateb gan | Response from: The Kennel Club

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?

The Kennel Club is an active member of the Greyhound Forum, working in conjunction with other animal welfare organisations and the industry to improve welfare standards throughout the whole life of racing greyhounds, both at and away from the track.

In response to the Welsh Government's 2024 consultation - "Licensing of animal welfare establishments, activities and exhibits" - we supported the introduction of a licensing scheme to regulate greyhound racing in Wales. We believe it would've been appropriate to try a regulatory solution first, before an outright ban.

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?

We believe the Bill as drafted will deliver the stated policy intention.

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?

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?

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?

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

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)?

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

The Bill will ban greyhound racing in Wales, which has the potential to result in negative outcomes for the dogs currently racing in Wales. We are pleased that the Welsh Government has established an expert implementation group. It’s of paramount importance that the welfare of racing greyhounds is given primary consideration in relation to the implementation of the proposed legislation.

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?

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

PGRWB 21 Angela Shearing

Ymateb gan | Response from: Angela Shearing

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?

I strongly support the Prohibition of Greyhound Racing (Wales) Bill and believe the ban should take effect within 12 months of the legislation coming into force.

Allowing racing to continue until 2030 is far too long. Each extra year means more dogs will be bred, raced, injured, or killed, and put greater pressure on rescue and rehoming organisations.

The welfare sector is ready: The Wales Greyhound Partnership (WGP), made up of nine animal welfare charities, have demonstrated they have the capacity to safely rehabilitate and rehome all affected dogs within a year.

The WGP has the capacity to rehabilitate and rehome up to 258 dogs. With an average rehoming time of just two months, and 120 greyhounds successfully rehomed since its formation, the partnership has clearly demonstrated that it is highly possible to rehome dogs affected by the ban in a significantly shorter timeframe than that currently proposed in the legislation.

In New Zealand, in the penultimate year of racing (2024/2025) before the country's own ban takes effect, injuries to greyhounds rose sharply: more than 800 dogs were injured, including 114 broken bones, and 17 deaths, making it the deadliest year for greyhounds since the industry was placed on notice. This demonstrates that racing can often intensify when under threat, and Wales must work to prevent the same.

A clear, firm end date gives both the industry and rescue groups time to prepare responsibly while protecting dogs from further harm.

It is important that the penalties under the legislation act as a strong deterrent to prevent racing from continuing illegally, and that the law is flexible to apply to individuals involved – including trainers and owners of any greyhound raced or trialed in Wales, as well as track operators and organisers.

PGRWB 22 Mike Doughty

Ymateb gan | Response from: Mike Doughty

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?

I write to voice my strong support the upcoming Prohibition of Greyhound Racing (Wales) Bill.

It is to the Senedd's credit that this bill has been brought forward and it needs to pass into law.

The ban should take effect within 12 months of the legislation coming into force.

I look forward to its successful passing.

PGRWB 23 Melanie Jenkins

Ymateb gan | Response from: Melanie Jenkins

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?

I write to voice my strong support the upcoming Prohibition of Greyhound Racing (Wales) Bill.

It is to the Senedd's credit that this bill has been brought forward and it needs to pass into law.

The ban should take effect within 12 months of the legislation coming into force.

I look forward to its successful passing.

PGRWB 24 Linda Leeves

Ymateb gan | Response from: Linda Leeves

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?

I strongly support the ban on greyhound racing. The ban should proceed immediately as delay will cost lives and further injury to greyhounds. I cannot understand why people can support the sport knowing that these greyhound run such a high risk of injury. Wales can be a leader in banning this so called sport.

PGRWB 25 Sheila Andersen

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: Sheila Andersen

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?

I strongly support the above noted bill and believe the ban should take effect within 12 months of the legislation coming into force.

Allowing racing to continue 2030 means that more dogs will be bred, raced, injured, or killed, and put greater pressure on rescue and rehoming organisations.

A clear, firm end date gives both the industry and rescue groups time to prepare responsibly while protecting dogs from further harm.

PGRWB 26 SPCA New Zealand

Ymateb gan: SPCA Seland Newydd | Response from: SPCA New Zealand

Tēnā koutou,

Letter of Support: Prohibition of Greyhound Racing (Wales) Bill

The Royal Society for the Prevention of Cruelty to Animals New Zealand (SPCA NZ) strongly supports the Prohibition of Greyhound Racing (Wales) Bill and stands alongside the RSPCA UK in calling for an end to this industry.

As New Zealand's oldest and largest animal welfare organisation, we have closely monitored the welfare impacts of commercial greyhound racing both here and overseas. In New Zealand, the industry has long been associated with high injury rates, inadequate socialisation, oversupply of dogs, and poor transparency. These are not isolated problems; they are systemic issues inherent to commercial greyhound racing.

After decades of attempted reform, the New Zealand Government concluded that these harms could not be eliminated through regulation alone. In 2024, Cabinet announced that greyhound racing in New Zealand will be phased out entirely by 31 July 2026. This decision reflects strong public sentiment, robust scientific evidence, and multiple independent reviews that found the welfare risks to be intrinsic to the industry's operations.

SPCA NZ commends the Welsh Government for taking steps to end greyhound racing. Our experience shows that regulatory changes cannot address the fundamental welfare harms of the industry, and prohibition is the only effective way to prevent further suffering. We support a managed wind-down period to ensure greyhounds are responsibly rehomed and to enable a fair, just transition for those employed in the sector.

We stand in solidarity with the RSPCA UK and other animal protection organisations advocating for this Bill. Prohibiting greyhound racing in Wales will prevent avoidable injuries and deaths, reduce the burden on rescue and rehoming organisations, and align legislation with contemporary community values on animal welfare.

Nāku noa, nā

Dr Arnja Dale

Chief Scientific Officer, SPCA New Zealand

PGRWB 27 Arena Racing Company

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, 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 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 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.
- 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 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 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>).

PGRWB 28 Battersea Dogs & Cats Home

Ymateb gan | Response from: Battersea Dogs & Cats Home

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?

The stated intent of the policy was to ban the act of Greyhound racing in Wales, this would require legislative change, as highlighted in the Welsh Government's Explanatory Memorandum. However as highlighted in our responses to further questions we have several concerns and questions on specific aspects of the Bill. The intention of the Bill is clear, and Battersea's sole concern remains the welfare of the Greyhounds involved in racing as the legislation prior to, during and after implementation.

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?

Battersea would welcome further clarity on how the Bill intends to stop all types of Greyhound racing. For example the Bill interprets Greyhound racing as "...running around a track in pursuit of a lure activated by mechanical means...". Whilst this will stop organised racing, it would not necessarily stop impromptu racing in a field around a temporary track with a different type of lure. If the intention is to stop all Greyhound racing, then we would suggest the Bill looks beyond that which is currently undertaken in Wales, and looks to consider preventing lower welfare alternative forms of racing.

Similarly, clarity would be welcome as to why the Bill is targeted at operators of a stadium or organisers of events, and does not include participants. If the aim is to disincentivise the activity, then everyone who undertakes the activity should be prohibited from doing so. For example, after the ban there may be cases of greyhound racing taking place under the guise of exercising the dogs. If this does not take place at a stadium, it will potentially be difficult for enforcers to identify who organised the event, and therefore no available enforcement for a prohibited activity. It is further hard to argue after all that it should be legal to attend or gamble on an activity that is illegal to carry out in Wales.

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?

3. As highlighted in our response to question 2, Battersea would welcome clarity as to why individuals undertaking greyhound racing are not included in Paragraph 1 (1) of persons committing an offence. Whilst it is important under the Animal Welfare Act that Greyhounds are properly exercised, there needs to be a distinction between what constitutes exercise and a race meet, to ensure that this does not create a loophole in the legislation.

Whilst the potential use of an unlimited fine is welcome, Battersea is concerned that no mention of links to other enforcement provisions are not mentioned. For example, in cases where animal welfare has been compromised a fine may not be appropriate, instead the enforcer should instead consider if prosecution through the Animal Welfare

(Sentencing) Act 2021¹⁸ and Animal Welfare Act 2006.¹⁹ Similarly, there will need to be robust guidance on the use of the unlimited fines.

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?

The Bill itself provides in Battersea's view a robust description of enforcers' powers of enforcement. However, there is no mention of burden of proof for prosecution, or what is considered suitable evidence. Whilst this shouldn't be on the face of the Bill, there is little information provided in the Explanatory Memorandum. Battersea is similarly concerned that there does not appear to be any planned provisions for training of enforcers on their new powers under the Bill. This will be important, and potentially carry financial cost.

In the Explanatory Memorandum in chapter 8, the impact on Local Authorities, it only appears to discuss impacts to Caerphilly County Borough Council, where the current Valley track is located. This does not guarantee that all trainers working and racing at the track are based in that Council area. However, the ban would extend to all of Wales, therefore there will be an impact on all Local Authorities as they will have a duty to take any action against illegal activity, either at a stadium or not.

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?

Battersea is concerned over the significant timescale in Section 5. With only one track, and an implementation group already working, it is unclear why a maximum of three years will be needed for the Bill to come into force. It will be critical once the Bill is enacted for a clear timeline for the ban to be brought into force. To ensure that the welfare of Greyhounds is safeguarded through the process it is critical to have a clear timetable, to ensure the safe rehoming of Greyhounds from the track.

There is sufficient rehoming capacity to rehome all of the Greyhound currently racing, through the Welsh Greyhound Rehoming Partnership, of which Battersea is a member. This partnership was set up following the announcement of a ban, to ensure capacity. Since the announcement and the beginning of August this year members of this partnership have facilitated the rehoming of 52 Greyhounds who had their last race at or were located at Valley stadium, however, the true number who have raced at Valley may be higher. It is also likely that without a timetable these dogs have been replaced, and other dogs may now have been recruited into racing.

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

As highlighted in the previous question, clear timelines for the implementation of the Bill are needed to ensure Greyhound welfare. From the rehoming perspective this is to ensure that organisations such as Battersea can allocate rehoming provisions to Greyhounds, which will potentially not all be rehomed to owners in Wales.

¹⁸ [Animal Welfare \(Sentencing\) Act 2021](#)

¹⁹ [Animal Welfare Act 2006](#)

In Chapter 8 of the Explanatory Memorandum (8.56) it is highlighted that not all rehoming organisations are able to receive the bond from the Greyhound Retirement Scheme, if they are in favour of a ban. Although this is technically out of scope of the Bill, Battersea would advocate that the bond is made available to all organisations that are aiding in the rehoming of Greyhounds from the GBGB track, as this will help them with the associated increase in costs.

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)?

Battersea does not take a view on this question.

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

Battersea does not take a view on this question.

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?

Battersea does not take a view on the economic impacts of the Bill.

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

Battersea would highlight point 8.47 in the Explanatory Memorandum, where it is raised that with the prohibition of Greyhound racing in Wales there would be a gradual decline in the requirement for Greyhound rehoming. This is unlikely to happen given Greyhound racing will continue in England with an estimate 10,000 dogs involved in the sport.²⁰ Indeed, with no sister legislation planned in England it is possible that the overall amount of racing will hardly diminish if more racing takes place in England. This is coupled with the fact that for the last two years, over 1,500 dogs per year²¹ have been retained by the owner, potentially awaiting a rehoming place.

²⁰ [Greyhound Forum 160625 Summary.pdf](#)

²¹ [2018-2024 Injury Retirement Summary FINAL.pdf](#)

PGRWB 29 League Against Cruel Sports

Ymateb gan: Y Gynghrair yn Erbyn Chwaraeon Creulon | Response from: League Against Cruel Sports

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?

The League Against Cruel Sports welcomes the opportunity to submit written evidence to the Culture, Communications, Welsh Language, Sport and International Relations Committee consultation on the Prohibition of Greyhound Racing (Wales) Bill.

The League has long campaigned for a ban on greyhound racing and consistently highlighted the harm inflicted on greyhounds by the industry. As early as 2014, our report "*The State of Greyhound Racing in Great Britain: A Mandate for Change*" uncovered deeply concerning issues, including poorly maintained tracks, excessive racing schedules leading to serious injuries such as broken backs and limbs, the abandonment of unwanted dogs, and, tragically, cases of greyhounds being killed.

In addition, the Welsh Government's consultation on the licensing of animal welfare establishments, activities and exhibits, including greyhound racing, demonstrated strong public support for ending the practice. Almost two-thirds (64.69%) of respondents favoured either a phased or an immediate ban on greyhound racing. Of the **1,180 total responses**, **292** came from League Against Cruel Sports supporters, with **234** of those responses originating from people in Wales. This clearly highlights how strongly the Welsh public cares about preventing needless suffering, injuries, and deaths of greyhounds.

The League fully supports the Prohibition of Greyhound Racing (Wales) Bill and its overall intent to prohibit the commercial racing, training, and trialling of greyhounds at stadiums and similar venues in Wales. This is a particularly positive step, as it not only addresses commercial racing but also prevents dogs from being schooled or trialled in Wales for use in races elsewhere.

There are several key areas where we believe the legislation should go further to ensure it achieves its aims effectively and without unintended consequences.

Timescale for Implementation

The League strongly supports the position of the *Cut the Chase* Coalition and other animal welfare organisations preparing to rehome affected dogs, in calling for greyhound racing in Wales to be ended **within 12 months of the legislation coming into force**.

In its current form, the Bill could allow greyhound racing to continue until 2030, which is far too long. Each additional year that racing remains legal will result in more dogs being bred, raced, injured, and killed. A drawn-out transition period of up to four years would also enable the replenishment of racing stocks, putting even more animals at risk and placing further strain on rescue and rehoming organisations.

Evidence from both Wales and abroad shows that the longer a phase-out period is allowed, the greater the welfare risks become:

Alarming, the Royal Society for the Prevention of Cruelty to Animals New Zealand (SPCA) expressed concern that in the penultimate year of racing (2024 – 2025) before the ban takes effect, injuries to greyhounds rose sharply: more than 800 dogs were injured, including 114 broken bones, and 17 deaths. This demonstrates that racing can often intensify when under threat, and swift implementation is therefore important to prevent similar outcomes.

To illustrate this point, Wales's last remaining track, Valley Greyhound Stadium, has already indicated plans to increase the number of race days. This could heighten risks to greyhounds as the volume of races and betting opportunities rise in the lead-up to the end of racing.

By contrast, experience shows that track closures can be delivered effectively within shorter periods. For example, the Swindon Abbey Stadium closure in England is set to complete a full wind-down within nine months of its closure announcement in March 2025.

The Wales Greyhound Partnership (WGP) was established shortly after the ban was announced in February and brings together nine animal welfare organisations, including members of the *Cut the Chase* Coalition. The partnership currently has the capacity to rehabilitate and rehome up to 258 dogs, with an average rehoming time of just two months. Since its formation, 120 greyhounds have already been successfully rehomed, clearly demonstrating that it is both realistic and achievable to rehome dogs affected by the ban within a much shorter timeframe than that currently provided for in the legislation.

The passing of the Bill in 2026 could see racing end in Wales by 1 of April 2027. A clear and firm end date would give both the industry and the rehoming sector the certainty they need to prepare for rehoming responsibly, while ensuring dogs are not exposed to further harm.

Strengthening Enforcement and Preventing Unintended Consequences

The League welcomes the Bill's proposal for unlimited fines, which would give magistrates the appropriate and necessary flexibility to impose meaningful penalties that act as a genuine deterrent against illegal racing and minimise the risk of repeat offences.

The proposed legislation currently covers the operator or track/similar venue and any persons involved in organising greyhound racing. This risks leaving key individuals who are responsible for greyhounds taking part in racing, outside the scope of enforcement. To mitigate any unintended consequences that could arise such as the facilitation of illegal/underground racing, we feel it is important that the legislation is applicable to individuals, including trainers and owners, of any greyhound raced or trialed in Wales, as well as track operators/owners.

As currently drafted, the Bill defines greyhound racing as dogs running around a track in pursuit of a mechanical lure. However, the meaning of "track" is not defined. Whilst it is understandable that the Welsh Government wishes to avoid inadvertently capturing everyday dog exercise or activities such as fun runs at agricultural shows, the lack of a clear definition creates the potential for loopholes. For example, it could allow straight-track racing to continue legally.

Running around oval-shaped tracks and negotiating bends at speeds of up to 40 miles per hour is inherently dangerous for greyhounds. However, other factors such as the starting box, the lure mechanism, and the quality of track preparation and maintenance also all contribute to the likelihood of serious injury. This is why clear definitions are essential to prevent loopholes that allow dangerous commercial racing to continue.

Clear definitions, appropriate enforcement, and robust penalties are all crucial to ensure that this legislation achieves its purpose and that no opportunities remain for greyhound racing to continue in a way that puts greyhounds at risk of injury.

Conclusion

The Prohibition of Greyhound Racing (Wales) Bill marks a pivotal moment for animal welfare in Wales. By ensuring the ban is fully implemented within 12 months of the Act coming into force, Wales can lead the UK in ending this outdated and inhumane industry. As seen in New Zealand, when change is needed, people and organisations come together to make it happen – Wales can do the same. We urge the Committee to recommend strengthening the Bill to ensure a swift and effective transition away from greyhound racing that prioritises the welfare, safety, and future of every greyhound affected.

Rt Hon Elin Jones MS
Presiding Officer
Chair of Chairs' Forum

06 October 2025

Consultation: Reviewing Committee Effectiveness in the Sixth Senedd

Dear Llywydd,

Thank you for your letter of 8 July 2025, seeking the Committees' views on committee effectiveness in the Sixth Senedd, which we considered at our meeting on 17 September 2025.

Although our Committee has not scrutinised a bill during this Senedd term, we were invited by the Children, Young People, and Education Committee to contribute to Stage One scrutiny of the Welsh Language and Education (Wales) Bill ("the Bill") in the Autumn Term of 2024. We undertook this work using a rapporteur model. The following observations are based on our experience with that model and on individual Members' reflections on the Bill process.

We are grateful to the Children, Young People, and Education Committee for enabling our involvement. However, as a Committee, we felt strongly that this Bill required thorough scrutiny from both education and Welsh language perspectives. We found the rapporteur model to be less effective due to scheduling conflicts, as both committees involved meet during the same time slot. This made it difficult for the rapporteurs to fully engage with the Bill's examination while managing ongoing committee responsibilities. They were also unable to provide meaningful feedback to our Committee, limiting its overall contribution. As a result, we believe Welsh language considerations did not receive the attention they merited.

Our experience highlights the importance of examining all draft legislation holistically to ensure comprehensive and balanced scrutiny of all policy aspects. The Senedd Commission may wish to revisit the model of Bill Committees, introducing flexible membership determined on a bill-by-bill basis to ensure the inclusion of Members with appropriate subject matter expertise.



More broadly, we observed that committees face considerable disruption when attempting to balance the scrutiny of bills with their wider responsibilities. The burden of legislative scrutiny has also not fallen evenly across committees, often resulting in extended periods for some during which little policy scrutiny can be undertaken.

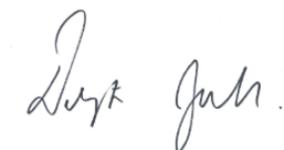
The Committee reflected on the frequent changes in Committee Membership during the Sixth Senedd. This has an impact on continuity and the development of in-depth subject knowledge, which is vital for effective scrutiny and to support follow-up work. We hope that in future Senedd terms, with more Members sitting on fewer committees, it will be easier to maintain continuity and build expertise.

The challenge of Members serving on multiple committees, combined with timetabling constraints, has meant that we have not had the flexibility to meet as frequently or for as long as we would have liked. This has limited our ability to cover the full breadth of subjects within our wide remit, and to do so in the level of detail we would have preferred. In practical terms, maintaining quorum has been a challenge, and scheduling of business has often been difficult, particularly on Wednesdays, when the Committee is only able to meet until 12.30. We suggest that consideration is given to how committee timetables can be managed more strategically in the Seventh Senedd to make the best use of the time available for scrutiny with fewer membership clashes and competing demands.

At the beginning of the Sixth Senedd, the Committee undertook training to establish how we wanted to work together and approach scrutiny. We found this to be a valuable exercise and would welcome the opportunity to be able to do this annually and whenever there are changes to committee membership. Unfortunately, the current timetable has not allowed for that kind of strategic planning, which would have been beneficial to our work.

I hope our reflections are useful to the Chairs' Forum in undertaking your review.

Yours sincerely,



Delyth Jewell MS
Committee Chair

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.

Eluned Morgan MS
First Minister of Wales
Welsh Government

06 October 2025

Update on progress against the International Delivery Plan

Dear Eluned,

Thank you for your letter of 21 July 2025, and for sharing the first quarterly update on progress against the International Delivery Plan (IDP). The Committee welcomes the opportunity to review the progress update, which we discussed at our meeting on 17 September 2025.

Report structure and accessibility

Members acknowledge the pressures which are on the International Relations team, as well as the finite resources available. With that in mind, the Committee is keen to ensure that any feedback is constructive and proportionate. In reviewing the progress update, Members have identified a number of practical suggestions which might help to improve clarity and accessibility for stakeholders. In particular, the Committee recommends that future reports should be structured to align with the numbered actions set out in the IDP, which would support easier cross-referencing and tracking of progress against specific commitments. The Committee notes that information on some events is repeated in several places within the document. Whilst activities may deliver across multiple actions, cross-referencing would make the report more concise and easier to read. Case studies should also clearly set out which actions within the action they are delivering.

Content and updates

The Committee was disappointed not to receive an update on the International Investment Summit, given its status as one of the Welsh Government's top priorities for delivery before the end of this year. The Committee would appreciate a dedicated update on this in the next quarterly report, along

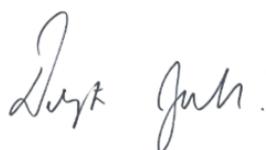
with the Welsh Government's analysis of progress against all actions in the International Strategy and associated plans, as committed to in your letter of 9 June 2025.

Monitoring and evaluation

In addition to these formatting considerations, the Committee wishes to highlight our broader, longstanding concerns about the provision of evidence to demonstrate "outputs, outcomes, and impacts". These issues have been a consistent theme in the Committee's work and are currently being explored in depth through our inquiry into the Welsh Government's International Strategy. We intend to address the matter of monitoring and evaluation in further detail in our forthcoming inquiry report, which we anticipate will include reflections on how the Welsh Government's work in this area could be strengthened to ensure greater transparency and accountability.

We hope these comments are helpful, and look forward to continued dialogue on these important issues.

Yours sincerely,



Delyth Jewell MS
Committee Chair

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.

**Culture, Communications, Welsh Language,
Sport, and International Relations
Committee**

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17 October 2025

Dear Dafydd,

NoFit State

We have been made aware of the critical and urgent financial situation facing the NoFit State circus company. They have told us that they have applied for additional Arts Council funding, and that if this bid fails, they will need to make substantial redundancies from 1 November.

We would be very grateful if you could please:

Provide assurances that the Arts Council is expediting this funding decision, is mindful of the critical and urgent nature of the situation, and is aware of how the uncertainty is affecting staff; and

Provide details about how you are making the Welsh Government aware of the critical situation facing arts organisations.

You recently described the fragility of the arts sector when giving evidence to the Committee, saying that there are a high number of arts organisations that are “at risk”, and that there is “no slack” in the system. We are looking for assurances that the Arts Council is doing all it can to support the sector, including communicating the scale of the problems facing the sector to the Welsh Government.



I would be grateful for an answer as soon as possible, owing to the urgency of this situation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Delyth Jewell'.

Delyth Jewell MS
Committee Chair

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.

17 October 2025

Delyth Jewell MS

Chair of the Senedd's Culture, Communications, Welsh Language, Sport and International Affairs Committee

Dear Delyth

NoFit State

Thank you for your very timely correspondence.

In relation to NoFit State, we have been engaged in discussions with the company for several weeks, and this situation has been a priority for us for some time. Both we and Arts Council England, which co-funds NoFit State, have been part of these discussions. As it happens, a meeting has been arranged this afternoon, in the hope that we can agree on a short-term solution that will allow the company to continue, without any change, for a period of time. This will give everyone time to plan, assess the situation and agree on a business plan and programme that will provide a long-term solution. That is the hope.

In terms of how we communicate information regarding these kinds of needs and situations to the Government, this is an ongoing process. However, the Government also receives our Council papers, including our monitoring reports, which outline the situation facing companies that we fund through multi-year agreements. The Council's next meeting will be held next Friday. I meet with the Government either monthly or fortnightly, as required, while formal meetings are held quarterly to assess our wide-ranging work. The last such meeting was held on the morning after our appearance before the Committee, and we discussed the evidence that we provided to you at that meeting.

The Chair and I hold formal biannual meetings with the Minister. I hope that this response eases some of your concerns regarding NoFit State and our response to the situation. I would be happy to provide further information when appropriate.

Sincerely



Dafydd Rhys
Chief Executive

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Rhif Elusen Gofrestredig/Registered Charity Number: 1034245

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Rydym yn croesawu gohebiaeth yn y Gymraeg a'r Saesneg, ni fydd gohebu drwy gyfrwng y Gymraeg yn arwain at oedi.
We welcome correspondences in Welsh and English, corresponding in Welsh will not lead to a delay.

Delyth Jewell MS, Chair, Culture, Communications, Welsh Language, Sport, and International Relations Committee

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22 October 2025

Dear Delyth,

Petition P-06-1526 Save Grassroots Sports – Welsh Government Must Step In!

The Petitions Committee met on 6 October and considered the above petition, submitted by Craig Roch.

The petitioner was congratulated on the success of their petition following the reversal of Caerphilly Council's decision on pitch fees. It was agreed to close the petition, but in doing so, the wider issues facing grassroots sport in Wales were noted, and so it was also agreed to write to you to highlight those. The Committee also agreed it would highlight the wider issues raised by the petition with the Minister for Culture, Skills and Social Partnership.

The full details of the Committee's consideration of the petition, including the correspondence and the actions agreed by the Committee can be found here: [P-06-1526 Save Grassroots Sports – Welsh Government Must Step In!](#)

I would be grateful if you could send any response by e-mail to the clerking team at petitions@senedd.wales.

Yours sincerely



Carolyn Thomas MS
Chair

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.

**P-06-1526 Save Grassroots Sports – Welsh Government Must Step In! -
Correspondence from the Petitioner to the Committee, 22 September 2025**

Further Commentary on Petition 246573: Save Grassroots Sports – Welsh Government Must Step In

The minister's response fails to acknowledge the real-world impact of the proposed 75% increase in pitch fees on grassroots sport. Community clubs operate on tight budgets, and such a hike would inevitably be passed on to players and families — increasing household costs and risking a decline in participation. This is not hypothetical; it's already happening.

While the minister points to Sports Wales funding, this is not a reliable safety net. Our club applied for a Sports Wales Facilities Grant this year and was refused. The process lacks transparency and consistency, and many clubs are left without support. The system is arbitrary and does not reflect the urgent cost pressures we face.

Beyond pitch fees, clubs are grappling with rising energy bills, maintenance costs, staffing, and the collapse of traditional income streams from social clubs and trading arms. These financial pressures are cumulative and unsustainable. The minister's response does not address this broader context.

Grassroots sport is not a luxury — it's a vital part of community life, public health, and youth development. If local authorities cannot afford to maintain facilities without passing on unaffordable costs, then the Welsh Government must intervene. Emergency funding and a long-term strategy are essential to protect the future of community sport.

Ein cyf/Our ref: PO/FM/00511/25

Delyth Jewell MS
Chair
Culture, Communication, Welsh Language, Sport and International Relations Committee
Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

24 October 2025

Dear Delyth,

I am writing in response to your letter of 21 August inviting me to provide evidence to the Committee as part of its scrutiny of the Welsh Government's Draft Budget 2026-27.

As is customary, I attend the Committee once each year and was pleased to do so in June. I remain committed to supporting the Committee's scrutiny work and will provide a written response to the questions by 3 November, as requested.

The Welsh Government's Outline Draft Budget for 2026-27 has now been published and is currently subject to scrutiny and allocation work. I am working with officials on the allocation of funding for individual activities. I am also happy to continue answering any further questions by correspondence. The final budget will be considered and agreed by the Senedd in January.

Yours sincerely,



Eluned Morgan

Bae Caerdydd • Cardiff Bay
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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.



Welsh Government Response to the UK-EU implementation review of the Trade and Cooperation Agreement

I would like to thank all four committees for the work they have undertaken to produce these recommendations.

The European Union is our closest and largest trading partner, and the Trade and Cooperation Agreement (TCA) governs the relationship between the UK and the EU.

However, the agreement is not a like-for-like replacement for the market access that the UK had as an EU member, and it has created barriers for Welsh businesses.

The Welsh Government has always advocated for a closer association with the EU. The announcement of a Common Understanding between the UK and EU in May 2025 provides opportunities to open negotiations, reset the relationship between the UK and the EU and reduce barriers for Welsh businesses.

Both these negotiations, and the TCA review, are upcoming negotiations and what can be set out and discussed publicly is necessarily limited due to sensitivities around international negotiations.

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Responses to the Culture, Communications, Welsh Language, Sport, and International Relations Committee Recommendations

Recommendation 1.

The Welsh Government should continue to regularly review and update its EU priorities, closely monitoring developments for their potential impact on Wales.

Response: Accept

The Welsh Government actively updates and reviews its priorities as negotiations develop and circumstances change. We will continue to review and update EU priorities and consider any potential impact on Wales as part of this ongoing work.

Financial Implications: None

Recommendation 2.

The Welsh Government should work to strengthen its relationships with EU institutions in order to advance Welsh interests and gain deeper insight into the EU's position and develop a dedicated EU Strategy.

Response: Accept in Principle

The Welsh Government already has active relationships with many EU institutions, and we will continue to strengthen these as our work progresses. These relationships have developed through the work undertaken by our Brussels office and our dedicated Representative for Europe as part of the delivery remit for our International Strategy, which includes our relationship with Europe and the EU. The focus and foundation of any developments of the relationship with the EU should be around recreating a relationship that works for both sides and this is already happening. As the current International Strategy draws to a close, and we move into a new phase of Wales' relationship with the EU, consideration will be given to whether a dedicated EU Strategy is required as part of our wider work on our approach to international relations.

Financial Implications: None

Recommendation 3.

The Welsh Government should, in its response to this report, confirm whether it is:

- actively pursuing full participation rights at UK-EU meetings where it has observer status.
- requesting to attend UK-EU meetings that fall outside the TCA institutional framework.

Response: Accept

The Welsh Government can confirm that it is not actively pursuing full participation rights at UK-EU meetings where it has observer status. The EU does not allow devolved governments to have participation rights. This is comparable to individual EU Member States also having observer status. However, we can confirm that we continue to engage with the UK Government on the committees that fall within the TCA institutional framework, to ensure that our interests are represented at these meetings. The Welsh Government will request attendance at any relevant UK-EU meetings that fall outside of the TCA institutional framework, where we believe this is appropriate.

Financial Implications: None

Recommendation 4.

The Welsh Government should update its review priorities to reflect its stated position, outlined by the Cabinet Secretary in response to the Culture shock report, of fully supporting the PPA's recommendation for a comprehensive solution for touring artists, covering both the movement of people and goods.

Response: Accept

Our International Delivery Plan 2025 reaffirmed our commitment to European engagement and the priority that the Welsh Government places on working with the UK Government on its ambitions to reset the UK-EU relationship. We continue to use all available levers to encourage the UK Government and the EU to ease the difficulties faced by creative sector workers. At the UK-EU relations Inter-Ministerial Group (IMG) meeting on 23 September 2025, the Cabinet Secretary for Economy, Energy and Planning raised the issue of touring artists and the importance of coming to a solution for them.

We welcome the recent re-set in relations between the UK and the EU and the announcement of the UK-EU Common Understanding Agreement. We

particularly welcome the announcement made by the UK and EU governments at the summit on 19 May to establish a mutual commitment to negotiating a youth experience scheme. We believe such a scheme could potentially benefit young artists, as it is generally younger, less-established artists who face the greatest challenges when touring with increased costs, time limits, and bureaucracy resulting from EU exit.

Financial Implications: None

Recommendation 5.

The Welsh Government should make representations to the UK and the EU to ensure that the issue of touring artists remains a priority. This should include calling for the UK and EU to articulate plans for improvements.

Response 5: Accept

The Welsh Government are using all available levers to encourage the UK Government and the EU to ease the difficulties being faced by creative sector workers, particularly touring artists. This includes actively engaging with the UK Government and the EU, to ensure that the interests of Welsh creative workers are represented and advanced. We recognise that further discussions are needed about supporting touring artists and we will continue to raise this matter with the UK Government. At the UK-EU relations Inter-Ministerial Group meeting on 23 September 2025, the Cabinet Secretary for Economy, Energy and Planning raised the issue of touring artists and the importance of coming to a solution for them.

Financial Implications: None

Recommendation 6.

The Welsh Government should provide a comprehensive list of EU programmes that it would like to participate in and indicate the extent to which there is agreement between the four UK governments on participation.

Response: Accept

The written Statement¹ published by the Cabinet Secretary for Economy, Energy and Planning following the EU summit in May, set out our ambition for Wales to participate in a broader range of EU programmes, including Erasmus+ as well as accessing other EU programmes such as Creative Europe and European Territorial Cooperation.

¹ [Written Statement: EU- UK Summit \(19 May 2025\) | GOV.WALES](#)

Financial Implications: None

Recommendation 7.

The Welsh Government should share its understanding of why UK association to additional EU programmes, including Creative Europe, was not agreed in Common Understanding, and whether association to other programmes is still being pursued by the UK Government.

Response: Accept

Access to additional EU programmes such as Erasmus+ and Creative Europe is a priority that we regularly emphasised with the UK Government ahead of the May summit. The Welsh Government is pleased that the UK and EU agreed to work towards association of the Erasmus+ programme and are working intensively with the UK Government to ensure that Welsh interests are represented in these negotiations and the other areas of cooperation agreed as part of the Common Understanding.

We cannot comment on the negotiations that took place between the UK and EU ahead of the May Summit. We note and welcome the commitments in the Summit Joint Political Statement for regular meetings to consider joint strategic interests and ensure opportunities for future cooperation are maximised. In this context, we will continue to press the UK Government to include access to additional EU programmes, such as Creative Europe, as a priority for future EU-UK discussions.

Financial Implications: None

Recommendation 8.

The Welsh Government should clarify whether changes to the TCA are required to facilitate UK participation in additional EU programmes.

Response: Accept

The written evidence refers to the implementation review of the TCA, the text relating to the review is standard text commonly used by the EU in its trade agreements. Reviews conducted under these agreements have not led to significant changes to the respective agreements in the past.

The Common Understanding Agreement, agreed in May 2025, is a framework agreement which set out areas where the UK and the EU are seeking closer cooperation. The negotiations for this work are currently underway and are separate to the review of the TCA. As negotiations are currently active, we

cannot comment on what may be included in any finalised agreement and if this finalised agreement may lead to amendments to the TCA.

Financial Implications: None

Recommendation 9.

The Welsh Government should confirm whether it has calculated the cost of participation in Erasmus+ and Creative Europe using the formula set out in the TCA, or whether it has been part of joint UK-wide exercise to do so.

Response: Accept

The decision to rejoin EU programmes such as Erasmus+ and Creative Europe is a reserved matter for the UK Government. The Welsh Government has not undertaken its own cost calculations for rejoining these programmes, nor has it participated in any UK-wide exercise to do so.

However, the UK Government has committed—through the Common Understanding with the EU—to work towards rejoining Erasmus+, and Welsh Government officials have been actively collaborating with the Department for Education (DfE) on this effort.

Additionally, the Welsh Government has clearly communicated to the UK Government its desire to participate in a broader range of EU programmes, including Creative Europe.

Financial Implications: None

Responses to the Economy, Trade, and Rural Affairs Committee Recommendations

Recommendation 10.

The Welsh Government should produce a perspectives document on the Trade and Cooperation Agreement in line with its approach to other international trade agreements as a matter of urgency.

Response: Reject

The Welsh Government published '*The new relationship with the EU: What it means for Wales*' in 2021². The 'perspective' documents have been published for newly signed trade agreements to provide an overview of potential impacts on Wales. The TCA has been in operation for several years and analysis on its impacts is already available. It should also be noted that the potential outcomes of any new arrangements with the EU as part of upcoming negotiations will render any immediate report out of date almost immediately. Should new arrangements be agreed with the EU, we will publish our views on these at that time.

Financial Implications: None

Recommendation 11.

The Welsh Government should report to the committees on the extent to which the Welsh and UK Governments' implementation review priorities align on trade and what the implications are for Wales. Where the UK and Welsh governments' priorities do not align, the Welsh Government should outline how it is going to support the affected sectors.

Response: Reject

I published a Written Statement responding to announcements made at the UK-EU Summit in May, including where the announcements represented the Welsh Government's high-level priorities, for example on seeking an SPS Agreement, cooperation on energy, alignment of Emission Trading Schemes, Youth Mobility and Erasmus+. However, our more detailed priorities on these areas form part of ongoing discussions between the UK and the EU and we cannot comment on upcoming negotiations. The Welsh Government meets regularly with the UK Government and continues to set out its priorities.

Financial Implications: None

² [The new relationship with the EU: What it means for Wales | GOV.WALES](#)

Recommendation 12.

The Welsh Government should continue to call on the UK and EU to prioritise practical steps to address trade friction and should provide this Committee with quarterly updates on progress in the areas listed in this chapter.

Response: Accept

The Welsh Government has always called on the UK and the EU to improve its trading relationship. The EU is our most important trading partner and any steps to reduce trade frictions are welcome. Updates are provided during the Cabinet Secretary's regular appearances before the Committees.

Financial Implications: None

Recommendation 13.

The Committee expects the Welsh Government to raise at intergovernmental meetings, practical steps to address trade barriers. It should provide detailed reports to this Committee on progress in its written statements and meeting notifications.

Response: Accept in principle

Intergovernmental meetings are forums for discussing the active trade negotiations. We follow the process of informing committees when meetings will take place and what is discussed. Whilst we are limited in including sensitive information, this includes the key points discussed at the meetings.

The various committees established under the Trade and Cooperation Agreement are often a better forum to discuss existing trade barriers and the Welsh Government makes representations to these committees on trade barriers. Minutes of committees are published by the UK and the EU accordingly.

Financial Implications: None

Recommendation 14.

The Welsh Government should ensure its business support for sectors are tailored to reflect the impacts the different treatment of goods and services are having on companies and sectors.

Response: Accept in Principle

The Welsh Government accepts that support needs to be updated and specific; however, the review of the TCA, which is due to take place in 2026, and the active negotiations for the common understanding which are currently underway are both variables which may influence how the treatment of goods and services will be considered, therefore it is prudent to actively monitor these negotiations and tailor support and guidance when information becomes available.

Financial Implications: None

Recommendation 15.

The Welsh Government should confirm if Common Understanding could require renegotiation of non-EU trade agreements.

Response: Accept

As the negotiation of elements of the Common Understanding, such as a potential SPS agreement, are not yet completed, it is impossible for us to say whether any final agreements will require re-negotiation of non-EU trade deals.

Financial Implications: None

Recommendation 16.

The Welsh Government should set out how it will ensure that Wales's unique position in post-Brexit trade flows is taken into account in discussions with the UK Government on a UK-EU SPS agreement.

Response: Accept

The Welsh Government recognises the strategic importance of the SPS agreement and is committed to ensuring that Wales's distinct trade profile, and devolved responsibilities, are fully reflected in ongoing discussions with the UK Government. We continue to support the UK Government's position in seeking an SPS agreement with the EU.

The Welsh Government will continue its active engagement with UK Government departments to ensure Welsh priorities are embedded in SPS negotiations. This includes continuing the frequent official level engagement we already have in place

and ensuring that Ministerial engagement takes place in a way that reflects the pace of any negotiations.

Financial Implications: None

Recommendation 17.

The Welsh Government should ascertain its role in the early consultation mechanism with the EU as part of an SPS agreement and inform the committees as soon as possible.

Response: Accept in Principle

The Welsh Government's role in the early consultation mechanism is a subject for negotiation in the forthcoming UK-EU Common Understanding negotiations and we are unable to comment on live negotiations; we will inform the committee of such a role as soon as possible.

Financial Implications: None

Recommendation 18.

The Welsh Government should keep the implications of an SPS agreement on border control posts under review and provide the Committee with an update in its response to this report and on a quarterly basis thereafter.

Response: Accept in Principle

The Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs set out the Welsh Government's position on Border Control Posts (BCPs) in Wales and this statement (highlighted under paragraph 154) remains the current position. The decision to pause the implementation of the Border Target Operating Model (BTOM) arrangements was made by the UK Government which has indicated that this will remain subject to review. Working with colleagues in the UK and Scottish governments, the Welsh Government will keep the implications of an SPS agreement on border control posts under review. We will update the Committee as appropriate but, while negotiations are still live, a quarterly review would not be appropriate.

Financial Implications: None

Recommendation 19.

In line with recommendations 12 and 13 of this chapter, the Welsh Government should provide the Committee with regular updates on the progress of UK-EU discussions, and discussions with the UK Government on the provision of services and the subsequent implications for Wales.

Response: Accept

The Welsh Government will, within the limits of what is possible to report during live negotiations, update the committee on the progress of UK-EU discussions during the Cabinet Secretary's regular appearances before the committee.

Financial Implications: None

Recommendation 20.

In its response to this report the Welsh Government should set out:

- why further improvements to MRAs on conformity assessments were not pursued in Common Understanding;
- confirm if this issue is still being pursued with the EU; and
- if it will form part of the implementation review.

Response: Accept

Currently the EU does not believe that there is reciprocal value in negotiating a Mutual Recognition Agreement (MRA) on conformity assessment with the UK and, as such, it was not included as part of the Common Understanding. The Welsh Government will continue to pursue both the UK and the EU in the value of a MRA to be included in future UK-EU Summit announcements.

Financial Implications: None

Recommendation 21.

The Welsh Government should provide an update and analysis of the historic and potential future effects of this issue on the shellfish farming sector and Welsh trade.

Response: Accept:

Due to lack of granular trade data for Wales, it is not currently possible to determine the value of trade in shellfish between Wales and the EU. However, published HMRC data shows, in the year ending June 2025 there was £9.3m worth of seafood exports (of which shellfish is a part of) from Wales to the EU. This is considerably lower than the £23.5m exported the year ending June 2015.

Statistics on Welsh aquaculture production from 2012 to 2023 are currently being developed as part of the UK Data Collection Framework. As these are Official Statistics in development we are unable to share until they are published. When the data is available Welsh Government will provide the committee with an analysis as requested.

Financial Implications: None

Recommendation 22.

In its discussions with UK Government on its priorities for the implementation review, the Welsh Government should emphasise the importance of addressing issues related to rules of origin.

Response: Accept

The Welsh Government has regular dialogues with the UK Government on rules of origin issues. We believe that the UK should seek to open negotiations to join the Pan European Mediterranean (PEM) Convention and have made this view clear to the UK Government.

Financial Implications: None

Recommendation 23.

In line with recommendations 12 and 13 of this chapter, the Welsh Government should provide the Committee with regular updates on progress relating to rules of origin.

Response: Reject

We are unable to provide detailed regular updates due to industry sensitivities and/or impact on live negotiations. We can continue to provide high-level updates.

Financial Implications: None

Recommendation 24.

In its response to this report, the Welsh Government should set out what its priorities are for addressing animal welfare issues through both the implementation review and the UK-EU reset and set out how it will balance the benefits of both alignment and divergence in this area.

Response: Accept

Welsh Government has always made clear that we will seek the inclusion of firm commitments within trade agreements to help improve animal welfare standards. This remains the case for both the implementation review and the negotiations for the UK-EU reset. We are working closely with the UK Government and other Devolved Governments to ensure that they are aware of our priority to maintain and enhance our high standards and ambitions for animal health and welfare and biosecurity in all UK Government Free Trade Agreement (FTA) negotiations. The UK and the EU both share commitments to improving Animal Welfare standards. We are proud of the high standards we have in Wales, including for animal health and welfare, traceability, and food safety.

Financial Implications: None

Recommendation 25.

In line with recommendations 12 and 13 of this chapter the Welsh Government should provide regular updates to the committees on this matter, including on the animal welfare dimensions of an SPS agreement.

Response: Accept in Principle

The Welsh Government will not be able to provide detailed updates on live negotiations but will comment on the provisions included in the final agreement.

Financial Implications: None

Recommendation 26.

The Welsh Government should explore with the other UK governments the development of a UK-wide mechanism to monitor alignment and divergence with the EU.

Response: Accept

The Welsh Government will explore with the UK Government, Scottish Government and Northern Ireland Executive, including through the Inter-Ministerial Group on UK-EU Relations, the potential to develop a UK-wide mechanism to monitor alignment with, and divergence from, the EU.

Financial Implications: None

Recommendation 27.

The Welsh Government should:

- set out how it feeds in Welsh assessments of alignment and divergence into UK intergovernmental discussions;
- clarify what discussions take place currently on alignment and divergence within the Welsh Government and its Trade Policy Advisory Group; and
- set out how it works with other stakeholders to seek their input on the effects of alignment and divergence.

Response: Accept

The Welsh Government meets frequently with the UK Government, Scottish Government and Northern Ireland Executive, including through the Inter-Ministerial Group on UK-EU Relations and the IMG EFRA to discuss a range of topics. This including discussions on alignment and divergence, where it is relevant to upcoming EU negotiations. In addition, the Welsh Government works with stakeholders through the Trade Policy Advisory Group to discuss alignment and divergence and its view on

EU reset work more broadly. We also engage with specific industry bodies when specific discussions on issues are needed.

Financial Implications: None

Responses to the Climate Change, Environment, and Infrastructure Committee Recommendations

Recommendation 28.

The Welsh Government should set out its position on whether the TCA meets the environment-related tests outlined in its 2024 approach to trade policy document.

Response: Accept

The Welsh Government's Approach to Trade Policy does not set out formal "environment-related tests." Instead, it outlines a series of policy expectations that trade agreements should meet to support Wales's environmental objectives and legal duties under the Well-being of Future Generations Act.

The expectation is for environmental provisions to be a key part of any trade agreement and that there should be no impact on our ability to meet our existing commitments both domestically or internationally or prevent us from making ambitious commitments in the future. This reflects the importance that the Welsh Government places on the environment, both in terms of addressing climate change and ensuring high levels of environmental protection.

The TCA generally aligns with these expectations, with shared commitments to non-regression, high levels of environmental protection and seeking to improve upon these standards. The environmental scope of the TCA is broad, including detailed provisions related to climate action and nature and biodiversity conservation, which are key Welsh Government priorities, in addition to several other areas related to environmental protection.

Financial Implications: None

Recommendation 29.

The Welsh Government should clarify whether it supports enhanced or additional UK-EU cooperation and/or agreements beyond the current provisions in the TCA.

Response: Accept

We accept and welcome the importance of enhanced cooperation in the areas identified under the common understanding, whilst recognising that the TCA does not replace the cooperation framework that existed across EU members prior to EU exit. However, the existing TCA does provide several routes for the exchange of views, for sharing information on areas of environmental policy and to identify areas of mutual interest and topics which would benefit from further discussion. For example, at the Level Playing Field -Trade Specialised Committee, the UK and the EU are able

to discuss core policy areas where further discussion may be beneficial. Welsh Government officials engage with counterparts on relevant agenda items.

Financial Implications: None

Recommendation 30.

The Welsh Government should clarify the Cabinet Secretary's comments, that closer alignment with the EU could lead to "a potential reduction in some of our standards or values around the environment", including examples of where this may be a concern.

Response: Accept

Whilst closer alignment may realise potential benefits, these need to be assessed on a case-by-case basis depending on the specific details of what that alignment might look like, to ensure any changes would support Wales's policy goals. Whilst there are a very small number of environmental regulations in scope of the common understanding, such as around the Emission Trading Schemes (ETS) provisions, the majority are out of scope. The EU and the Welsh Government both have high ambitions for environmental protection and, importantly, the TCA allows the UK and Devolved Governments to develop and implement policies appropriate for our domestic circumstances, including improving on existing levels of protection. However, the Welsh Government does not, and cannot know, what legislation the EU may introduce in the future. Thus, a situation could exist in the future where the EU could introduce legislation that runs counter to some of our environmental standards and values.

Financial Implications: None

Recommendation 31.

The Welsh Government should publish and share its views on the list of sectors that will be covered as a minimum by a future UK-EU ETS linking agreement, as set out in Common Understanding,

Response: Reject

ETS linkage is a subject for negotiation in the forthcoming UK-EU Common Understanding negotiations, and we are unable to comment in detail on upcoming live negotiations. However, the only sectors that can be covered by a linking agreement are those currently within the UK ETS and the EU ETS.

Financial Implications: None

Recommendation 32.

The Welsh Government should finalise a clear position on ETS linkage as a matter of priority.

Response: Accept in Principle

ETS linkage is subject to negotiation in the forthcoming UK-EU Common Understanding negotiations. There are potential benefits in linking which come with being part of a larger market. However, our view on ETS linkage will be informed by those negotiations, and we are unable to comment on live negotiations.

Financial Implications: None

Recommendation 33.

The Welsh Government should provide its view on the environmental and climate implications of the ETS linkage and CBAM exemptions envisaged by Common Understanding.

Response: Accept in Principle

The Welsh Government will take a view on the environmental and climate implications of ETS linkage and Carbon Border Adjustment Mechanism (CBAM) exemptions, once the forthcoming UK-EU Common Understanding negotiations have progressed. We will provide these views once negotiations have been completed.

Financial Implications: None

Recommendation 34.

The Welsh Government should explain how it is promoting the importance of UK-EU cooperation on energy infrastructure in Wales-adjacent seas, including in the Irish and Celtic seas.

Response: Accept

The Welsh Government is actively engaged on the energy portfolio between Wales and Ireland. The Welsh Government's Ireland team is an active member and participant in the UK-Ireland MoU meetings, supporting our energy policy officials on active projects.

The Welsh Government's team in Ireland works directly with Irish Government officials in the departments of Foreign Affairs, Transport and Energy on joint opportunities and

this has ensured that the Ireland-Wales 2030 Shared Statement³, which the First Minister signed in July 2025, had a key theme of collaborative working on energy.

The Welsh Government is also working with Celtic Sea developers on active projects to explore ways in which the Welsh ports and supply chain can maximise the benefits on offshore energy projects in the Celtic Sea. The Welsh Government are also working the Irish Maritime Area Regulatory Authority and undertaking collaborative working with Welsh counterparts. The Welsh Government is also active in exploratory discussions with the UK Government on possible UK access to the single EU electricity market as part of the Common Understanding between the European Commission and the United Kingdom.

Financial Implications: None

Recommendation 35.

The Welsh Government should confirm whether the mechanisms being considered for the resumption of shellfish trade include the UK's dynamic alignment to EU rules on water quality.

Response: Accept

The Welsh Government will monitor ongoing negotiations but will be unable to report on these until the final agreement is reached.

Financial Implications: None

³ [Ireland-Wales shared statement 2030 \[HTML\]](#) | GOV.WALES

Responses to the Legislation, Justice and Constitution Committee Recommendations

Recommendation 36.

The Welsh Government should provide information on discussions between the UK and the EU and between the UK's governments with the aim of reducing complexity arising from current arrangements.

Response: Accept in Principle

While discussions between the UK and the EU are sensitive, and not something the Welsh Government would be able to provide information on without the consent of both the UK and the EU. The Welsh Government does write to the committee to highlight discussions and minutes of IMG meetings. TCA committee meetings are published online.

Financial Implications: None

Recommendation 37.

The Welsh Government should set out the steps it is taking to simplify its own advice and guidance in respect of current UK-EU arrangements

Response: Accept in Principle

The Welsh Government is regularly reviewing its advice and guidance and, with the negotiations ongoing for the common understanding, this may amend the current trading arrangements. The Welsh Government will develop guidance when these negotiations have concluded.

Financial Implications: None

Recommendation 38.

The Welsh Government should develop its own guide to UK-EU arrangements, similar to that produced around the time of the UK's exit from the EU.

Response: Accept

As the review of the TCA is due to take place in 2026 and with negotiations ongoing for the common understanding, both of which may amend the current trading arrangements, the Welsh Government will develop guidance when negotiations for both have concluded.

Financial Implications: None

Recommendation 39.

The Welsh Government should call on the UK Government to outline its specific priorities for the implementation review and the scope of the review as a matter of urgency.

Response: Accept in Principle

The Welsh Government has regular discussions with the UK Government on the upcoming review, including where its priorities lie. The UK Government has currently not publicly outlined its specific positions for upcoming negotiations.

Financial Implications: None

Recommendation 40.

The Welsh Government should keep its priorities under review, monitor developments to understand their implications for Wales, and should notify the four committees if or when changes are made.

Response: Accept in Principle

As set out in recommendation 1, the Welsh Government will continue to review and update EU priorities and consider any potential impact on Wales as part of this ongoing work. Whilst we will notify the committee should changes be made to our high-level priorities, such as seeking an SPS Agreement, we will be unable to notify the committees of detailed negotiation positions during the negotiation period.

Financial Implications: None

Recommendation 41.

As we have previously recommended, the Welsh Government should make representations to the UK Government for the Inter-Ministerial Group on UK-EU Relations to take place sufficiently in advance of Trade and Cooperation Agreement meetings and UK-EU negotiations.

Response: Agree

The Welsh Government has made representations to the UK Government for IMG to take place in advance of negotiations.

Financial Implications: None

Recommendation 42.

The Welsh Government should call for the terms of reference of the Inter-Ministerial Group on UK-EU relations to be updated to take into account arrangements emanating from the reset, such as Common Understanding and the implementation review. This will make sure they remain fit for purpose for the next phase of UK-EU relations.

Response: Accept

The Welsh Government will ask for the terms of reference to be updated.

Financial Implications: None

Recommendation 43.

As we have previously recommended, the Welsh Government should call for a new memorandum of understanding on UK-EU relations to be agreed between the UK Government and the devolved governments.

Response: Accept in Principle

The Welsh Government is working with the UK and the other Devolved Governments on updating some of the four nations agreements that are currently in place. These discussions may be a route by which to explore cooperation around the UK and Devolved Governments' relationship with the EU.

Financial Implications: None

Recommendation 44.

The Welsh Government should ascertain how it will be involved in the early stage consultation mechanisms described in Common Understanding and should encourage the UK Government to reach an agreed position with the devolved governments.

Response: Accept in Principle

The role of the Welsh Government in early consultation mechanisms is a subject for negotiation in the forthcoming UK-EU Common Understanding negotiations and we are unable to comment on live negotiations. We will inform the committee of such a role as soon as possible.

Financial Implications: None

Recommendation 45.

The Welsh Government, in its response to this report, should provide an updated view on the compliance of border control arrangements with World Trade Organisation rules.

Response: Accept

World Trade Organisation (WTO) rules are applicable in situations where trading partners do not have a full scale free-trade agreement in place. As the UK and EU have a trade agreement in place, in the form of the Trade and Cooperation Agreement, preferential treatment on goods between the UK and the EU is permitted.

Financial Implications: None

Recommendation 46.

The Welsh Government should provide its view, in its response to this report, on whether the arrangements to be negotiated as part of Common Understanding could raise compliance issues with Wales's existing international obligations, including non-EU trade agreements.

Response: Accept

We are currently unable to comment on compliance of what may be included in the final arrangements that are part of the Common Understanding, as these have not yet been negotiated. However, we can be clear that the Welsh Government takes its international obligations seriously and would immediately raise with the UK Government if it thought that an arrangement being negotiated would lead to non-compliance. Once a final negotiated position has been reached, the Welsh Government will be able to set out its perspectives on any agreed position.

Financial Implications: None

Recommendation 47.

Welsh Government should provide its assessment of the operation of the European Union (Future Relationship) Act 2020, and of its implications for the devolution settlement, in the context of concerns raised with Senedd committees. This should include specific commentary on section 29.

Response: Reject

The Welsh Government's positions on the implementation of post-EU legislation has been stated on numerous occasions. The UK Government has committed to not normally legislate in areas of devolved competence without our consent and never without consultation. The Welsh Government will continue to monitor the operation

of the Act and section 29 but does not consider a specific assessment to be required at this time.

Financial Implications: None

Recommendation 48.

The Welsh Government should provide an update on discussions with the UK Government on the provision of financial support for UK Domestic Advisory Group participants.

Response: Accept

This issue has been discussed directly with the UK Government and it has confirmed that no funding is available and that all UK Domestic Advisory Group (UK DAG) meetings have a hybrid option for attending.

Financial Implications: None

Recommendation 49.

The Welsh Government should set out how it engaged with the UK Government's 2024 review of the membership of the UK DAG, and should explain the steps it took to raise awareness amongst Welsh organisations of the UK Government's expressions of interest campaign.

Response: Accept

The standard process we follow when membership of groups such as the UK DAG are being recruited for, or reviewed, is to use our existing networks, such as our Trade Policy Advisory Group, to raise awareness of these opportunities. However, in the specific case of the 2024 DAG review we do not have a record of whether this process was followed.

Financial Implications: None

Recommendation 50.

The Welsh Government should clarify the link, if any, between the Welsh Government's Trade Policy Advisory Group and the TCA's civil society forums.

Response: Accept

There is no formal link between the Trade Policy Advisory Group (TPAG) and the TCA's Civil Society Forum (CSF). The Trade Policy Advisory Group was set up provide the Welsh Government with advice on matters relating to Trade Policy, with its remit increasingly focusing on the EU Trade in 2024. Membership of both TPAG and the CSF is broad, including business bodies and a range of other organisations. Although,

some members of TPAG may also attend CSFs, there is no deliberate effort to ensure that CSF attendees are also TPAG members.

Financial Implications: None

Recommendation 51.

The Welsh Government should clarify how it monitors and engages with the work of the UK Domestic Advisory Group and the Civil Society Forum.

Response: Accept

While it is the responsibility of the UK Government to monitor the work the UK Domestic Advisory Group (DAG), some members of the Welsh Government's Trade Policy Advisory Group (TPAG) are also members of the UK DAG and as such we are able to hear their views directly. We also actively engage with other DAG members such as APBI, BSI, SMMT and UKAS⁴ to understand their views on key matters and identify opportunities to collaborate.

Financial Implications: None

Recommendation 52.

The Welsh Government should confirm if the governments of the UK are developing a central mechanism to monitor changes to EU law for the purposes of monitoring alignment and divergence.

Response: Accept

The Welsh Government will explore with the UK Government, Scottish Government and Northern Ireland Executive, including through the Inter-Ministerial Group on UK-EU Relations, the potential to develop a UK-wide mechanism to monitor alignment with, and divergence from, the EU.

Financial Implications: None

Recommendation 53.

The Welsh Government should set out how it has ascertained whether alignment and divergence has occurred between the UK and the EU, and between Wales and the EU, since the UK's exit from the EU.

Response: Accept in principle

This work is already underway in the areas that are currently being negotiated.

⁴ APBI - Association of the British Pharmaceutical Industry, BSI - British Standards Institution, SMMT - Society of Motor Manufacturers and Traders, UKAS - United Kingdom Accreditation Service

Financial Implications: None

Recommendation 54.

The Welsh Government should seek clarity on how EU law will apply in the UK if it is to dynamically align to the EU. It should ensure this process respects the role of the devolved governments and legislatures.

Response: Accept

We are currently engaging with the UK Government on how it intends to take forward legislation to implement any future agreements with the EU, including on the role that devolved legislatures will need to take to implement agreements in devolved areas. We have been clear that any legislative process must respect the devolution settlement and existing processes in the devolved governments.

Financial Implications: None

Recommendation 55.

The Welsh Government should clarify what role common frameworks will play in decision-making about UK alignment to the EU.

Response: Accept

Common Frameworks are an important mechanism for discussion and cooperation between the four governments in policy areas previously governed by EU law. They provide a forum to share evidence and explore the impacts of regulatory alignment and divergence, helping governments to make informed decisions on EU alignment. Each government retains the right to decide on EU alignment within its own competence. Frameworks help ensure those decisions are transparent and can support coordinated approaches where appropriate, while respecting each government's ability to diverge.

Financial Implications: None

Agenda Item 7.7

Rebecca Evans MS
Cabinet Secretary for Economy, Energy and Planning
Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio



Llywodraeth Cymru
Welsh Government

Mike Hedges MS
Chair
Legislation, Justice and Constitution Committee

SeneddLJC@senedd.wales

31 October 2025

Dear Mike,

I am writing in accordance with the inter-institutional relations agreement and further to my letter of 25 June to draw your attention to the [communiqué](#) which was published by DCMS on 17 October, following the Tourism Inter-Ministerial Group which met on 22 July 2025.

The meeting was chaired by the Minister for Creative Industries, Arts and Tourism, Chris Bryant MP, and I represented the Welsh Government.

The agenda enabled discussions on the current state of the tourism sector in their respective jurisdictions. As part of these discussions, I was pleased to be able to highlight the success of:

- the use of the Welsh language in the Hwyl marketing campaign to attract visitors to Wales;
- Visit Wales' weatherproofing fund for visitor attractions;
- the Welcome to Wrexham documentary which has been a significant benefit to Welsh tourism; and
- our focus on promoting business conferences.

I highlighted the introduction in Wales of the bill which gives local authorities the power to raise a visitor levy (which has since been passed into law). I also discussed challenges impacting the tourism sector, including a drop in domestic visitors due to the cost of living, rising National Insurance costs and high energy bills.

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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.

Rebecca Evans AS/MS
Cabinet Secretary for Economy, Energy and Planning
Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio



Llywodraeth Cymru
Welsh Government

I have copied this letter to the Chairs of the Finance Committee; Economy, Trade and Rural Affairs Committee, and the Culture Communications, Welsh Language, Sport, and International Relations Committee.

Yours sincerely,

Rebecca Evans.

Rebecca Evans AS/MS
Cabinet Secretary for Economy, Energy and Planning
Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio

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