

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

Meeting Venue:	For further information contact:
Remote via Zoom	Richard Thomas
Meeting date: 23 October 2025	Committee Clerk
Meeting time: 09.15	0300 200 6565
	SeneddCulture@senedd.wales

Remote

Private pre-meeting

09:00–09:15

Public

1 Motion to elect a temporary Chair under Standing Order 17.22 for this meeting

09:15

2 Introductions, apologies and substitutions

09:15

3 Prohibition of Greyhound Racing (Wales) Bill – Stakeholder evidence session with Academics

09:15–10:15

(Pages 1 – 65)

Dr Emily Blackwell, Senior Lecturer in Animal Behaviour and Welfare, Bristol University, and Chair of the Welsh Government’s implementation group

Dr Ellie Wigham, Scottish Animal Welfare Commission

Dr Rebekah Humphreys, Animal Ethics Specialist, University of Wales Trinity Saint David

Professor Andrew Knight, University of Winchester

Attached Documents:

Research brief



Written evidence – Dr Rebekah Humphreys

Written evidence – Professor Andrew Knight

Break

10:15–10:25

4 Prohibition of Greyhound Racing (Wales) Bill – Stakeholder evidence session with Greyhound racers

10:25–11:55

(Pages 66 – 99)

Mark Bird, Chief Executive Officer, Greyhound Board of Great Britain

Madeleine Campbell, Board Director, Greyhound Board of Great Britain

Katie Bennison, General Manager, Valley Greyhounds

Simon Franklin, Company Director, Racecourse Promoters Association

Richard Brankley, Head of Greyhound Operations, Sports Information Services

Attached Documents:

Written evidence – Greyhound Board of Great Britain

Written evidence – Racecourse Promoters' Association

Written evidence – Greyhound Board of Great Britain – Following the Committee's meeting on 15 October 2025

5 Motion under Standing Order 17.42 (ix) to resolve to exclude the public from items 6 and 10 of this meeting, and for the start of the meeting on 6 November 2025

11:55

Private

6 Prohibition of Greyhound Racing (Wales) Bill – Consideration of the evidence received

11:55–12:10

Lunch

12:10–12:55

Public

7 Prohibition of Greyhound Racing (Wales) Bill – Stakeholder evidence session with dog trainers

12:55–13:55

Malcolm Tams, Site Manager, Valley Greyhounds

Anna Jeffrey, Greyhound Trainer

Steve Howard, Greyhound Trainer

Mike Burton, Greyhound Trainer

Break

13:55–14:00

8 Prohibition of Greyhound Racing (Wales) Bill – Stakeholder evidence session with local authorities and enforcement

14:00–14:45

(Pages 100 – 109)

Robert Hartshorn, Executive Director for Education and Social Services,

Caerphilly County Borough Council

Zoe Phillips, Project Manager, Animal Licensing Wales

Attached Documents:

Written evidence – WLGA

9 Papers to note

14:45

9.1 Cymraeg for all?

(Pages 110 – 122)

Attached Documents:

Research article by Robert Jones and Gregory Davies on the experiences of Welsh-speakers at HMP Berwyn – 8 October 2025

9.2 Prohibition of Greyhound Racing (Wales) Bill

(Pages 123 – 271)

Attached Documents:

Written Evidence: Greyhound Rescue Wales – 7 October 2025

Copy letter from the Chair of the Finance Committee to the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs:

Requesting evidence on the financial implications of the Prohibition of Greyhound Racing (Wales) Bill – 9 October 2025

Letter from the Llywydd: Requesting written evidence on the practice of publishing pre-introduction versions of Bills – 10 October 2025

Dogs Trust and RSPCA submission to the Scottish Animal Welfare

Commission: Setting out their views on greyhound racing (February 2023) – 15 October 2025

All-party Group for Animal Welfare report: The fate of racing greyhounds and working lurchers in Wales (October 2003) – 15 October 2025

Greyhound Forum for Wales report: A better bet for greyhounds – A submission to the Welsh Assembly Government in view of proposals to introduce regulations and a code of practice for greyhounds racing in Wales (November 2007) – 15 October 2025

Voluntary code of practice: The Welfare of Racing Greyhound (Wales) – 15 October 2025

9.3 Welsh Government international relations

(Page 272)

Attached Documents:

Ministerial inward/outward visits for September 2025 – 10 October 2025

Private

10 Prohibition of Greyhound Racing (Wales) Bill – Consideration of the evidence received

14:45–15:00

Document is Restricted

Evidence from: Dr Rebekah Humphreys, Senior Lecturer in Philosophy, Co-Chair of University Research Ethics and Integrity Committee, University of Wales Trinity Saint David, Carmarthen, Wales, UK; specialist in Animal Ethics and Environmental Ethics.

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

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 general principles of the Bill are welcome and ethically sound, and there is a need for legislation to deliver the stated policy intention regarding the prohibition of Greyhound racing in Wales. The reasons for the Bill being welcome and the need for legislation in its regard are numerous, so I will here endeavour to outline that which I consider to be the main one, which is related to the ethical component of the Bill.

Greyhound racing as a practice and the industry more generally causes significant suffering to the dogs bred and used. The extent of the suffering is well documented as involving physical suffering (pain and injury, for example), mental suffering (in the form of stress, frustration and anxiety), and emotional suffering (such as loneliness). (See Animal Aid's material regarding greyhound racing; for more on sports, ethics and animals, see Humphreys, 2010, 2014, and 2020).

The practice currently fails to protect dogs (for the purposes of this written evidence, 'dogs' should be taken to mean 'greyhounds') from risk of injury, stress, and death, seriously preventing their welfare from being considered adequately. The most recent data indicates that the number of deaths from greyhound racing increased by 47% in 2023 compared to 2022, with 26,500 injuries recorded between 2018 and 2023. It is part and parcel of the practice that it cannot but cause significant injury to dogs, with severe injuries often leading to dogs being euthanised (RSPCA, 2024).

Dogs involved are routinely exposed to stress, frustration, and social isolation. They are trained to exhibit an exceptionally high prey drive, yet are rarely permitted to capture the 'prey,' which can lead to significant frustration. Following races, the dogs are normally returned to their kennels, where interaction with other dogs is usually restricted. Daily life in the kennels is inherently stressful, and, unlike companion animals, these dogs rarely receive the socialisation necessary for their well-being. Research indicates that greyhounds spend the majority of their lives in uncomfortable, often barren kennels with minimal environmental enrichment, resulting in a largely solitary and unstimulating existence.

Moreover, rescue and rehoming charities are already heavily burdened by the number of animals discarded by the sport. These organisations face significant pressure to take in as many as possible, despite the considerable challenges involved in rehoming them, as the alternative often presented by the industry is euthanasia (as reflected in the Greyhound Board of Great Britain’s own statistics, 2024 and 2025). Yet the notion that all dogs can retire from racing is misleading. Their elevated prey drive and limited socialisation skills with other animals often makes them challenging to place in many conventional homes. This contributes to a broader issue of abandoned or un-rehomed dogs, placing additional strain on rehoming organisations and limiting the number of dogs that can be successfully integrated into new households.

While it is difficult to quantify the full extent of suffering caused by injury, the structure of the greyhound racing industry inherently restricts dogs’ ability to lead a good life and flourish in relation to their species-specific needs and interests, let alone their individual ones. Their fundamental interests in freedom, natural functioning, and wellbeing are compromised throughout their lives (Humphreys, 2010). The conditions and practices within the industry severely limit the opportunity for dogs to engage in behaviours natural to their species, constituting a significant infringement on their dignity. ‘Some characteristic features of actions that violate a subject’s dignity seem to be that such actions are carried out without the subject’s consent, the subject’s mental and/or physical being is manipulated or disrupted in some way or another, the intervention is unwanted, and the actions do not purposefully aim to benefit the subject’ (Humphreys, 2016). Accordingly, it is clear, from the practice, that the dogs’ dignity is violated, excessive instrumentation being a contributing factor. Dogs, however, do have interests of their own and a good of their own, including vital ones, such as an interests freedom (or in exercising their own agency more specifically), functioning, and wellbeing (Humphreys, 2010, 2023). These are unjustifiably overridden within the industry by the more peripheral interests of the gambling industry in making a profit.

In the light of the Well-being of Future Generations (Wales) Act 2015, which emphasises that wellbeing should not be measured solely by economic indicators such as GDP, there is a further rationale for the Bill. Prohibiting greyhound racing would promote a sustainable and ethical approach to the treatment of animals, recognising them as sentient beings with their own interests and welfare—interests that, as a matter of justice, should not be subordinated to the comparatively peripheral pursuit of profit (Attfield and Humphreys, 2016, 2017, 2025).

Moreover, much of the suffering associated with greyhound racing lies beyond the direct control of Wales, as the majority of the dogs are bred and imported from Ireland. Consequently, Wales—and the UK more broadly—lacks the regulatory oversight necessary to ensure the welfare of these animals, providing an additional justification for prohibiting the practice.

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?

Having read the Bill thoroughly, I believe the terms of the Bill are workable and effectively deliver the stated policy intention. Importantly, the Bill provides clarity around (all but one of the) key

terms, ensuring that its provisions can be applied consistently in practice and reducing the scope for ambiguity or legal challenge.

For example, the definition of ‘greyhound racing’ 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)’ gives precision to the policy’s intention, avoiding doubt about the activities covered by the prohibition while still capturing the full range of practices the Bill seeks to address.

However, I believe it is important to consider the definition of the term ‘greyhound’ in this context. As far as I can see, the term is not defined in the Bill or explanatory memorandum. A broad definition would help prevent the industry from circumventing the Bill by breeding crossbreeds that are not technically classified as greyhounds but still share significant characteristics. In other areas of legislation, such as breed-specific regulation, challenges have arisen due to ambiguity in how breeds or terms are defined. Ensuring clarity here could therefore be beneficial, as a narrow definition may create a loophole that allows the unjustified use of other sighthounds (such as whippets or salukis) if they fall outside the scope of the Bill.

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?

One of the Bill’s strengths lies in its provisions under section 1, which states that ‘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’. This wording is general enough to ensure that the policy intention can be applied appropriately, while also being sufficiently specific to provide a coherent framework for the sections 2 and 3 to follow.

The subsequent provisions in Schedule 1 build on this foundation in a clear and structured way in relation to ‘commissions of offences’ and ‘proceedings’, setting out the necessary offences in a manner that supports consistency. Together, these elements work towards ensuring that the Bill is both practically enforceable and aligned with its underlying policy goals.

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 provisions set out in section 4 and Schedule 2 on enforcement appear to be both workable and proportionate in delivering the stated policy intention of banning greyhound racing in Wales. By giving enforcement authorities the power to investigate suspected breaches, enter premises (subject to appropriate safeguards), and take necessary enforcement action, the Bill ensures that the ban can

move beyond being a symbolic measure and instead be practically applied. The clarity of Schedule 1, combined with the enforcement framework in section 4 / Schedule 2, allows for a coherent system in which breaches can be identified and acted upon. The powers conferred are sufficiently robust to deter attempts to organise or facilitate greyhound racing covertly, while the procedural safeguards help ensure that enforcement action is proportionate and consistent with broader principles of fairness.

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?

With regards to section 5-6 of the Bill, these provisions for a gradual phase out make the ban enforceable in practice, supporting the intention to eliminate greyhound racing in Wales in a way that is both realistic and legally sound. It will allow time for enforcement authorities to prepare, allocate resources effectively, and engage in public awareness campaigns so that the ban is clearly understood before full enforcement begins.

This measured introduction could therefore reduce resistance, improve compliance, and ultimately ensure that the stated policy intention—bringing an end to greyhound racing in Wales—is achieved in a sustainable and enforceable way.

However, from the point of view of ethics and the lived experiences of dogs currently suffering within the industry, and in relation to the moral defence for this Bill, I would be inclined to recommend a more rapid implementation of the legislation to minimise unnecessary suffering during the interim period before it is fully enforced. But given the significantly reduced scale of the industry in Wales, the practical impact of an accelerated phase-in may be limited.

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

Resistance could be a potential barrier of the Bill by those with vested economic interests in greyhound racing. This is mitigated largely via a phase-in (being no later than 1 April 2030), which gives reasonable time for organisers, landowners, and associated businesses to adapt, reduce reliance on greyhound racing, and make alternative arrangements.

Compliance could present challenges if stakeholders involved in greyhound racing are not sufficiently informed about the scope of the ban. Lack of information may result in intentional breaches. Increasing awareness of the ban would be helpful in mitigating this issue.

There may also be transitional issues related to the need to rehome greyhounds. Whilst I do not think that this would create resistance to the ban from animal charities, it could raise an issue of provision for charities regarding support and funding, particularly in the light of their already strapped resources. The Blue Cross has confirmed that, in collaboration with other organisations, it is preparing to support the rehoming of animals currently used within the industry should the law be

changed. This will help ensure that no animals are unnecessarily euthanised and that a safe and secure route out of the industry is provided for all affected animals.

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)?

This question would need to be answered by a legal specialist.

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

One of the unintended consequences of the Bill relates to the beneficial environmental changes to local areas that a ban on greyhound racing would imply. Environmental costs related to the industry are currently externalised onto local communities. For example, drinking and anti-social behaviour are sometimes associated with the sport, particularly in relation to people's attendance at race sites, as well as littering and noise disturbance, with local people having to bear the burden of these consequences. The ban on greyhound racing would have the beneficial result that such problems, as they relate to attendance at stadiums or other venues, would be resolved.

In addition, these sites could potentially be reclaimed for social housing commitments or converted into wildlife areas—consequences that would be welcomed in relation to the aims of the Well-being of Future Generations (Wales) Act 2015.

Moreover, the Bill would influence public sentiment regarding the use and exploitation of dogs for profit, and could thereby have a positive impact in the future in relation to unregulated breeding more generally. This, in turn, could ease the pressure on animal charities, whose capacity for taking in rescued animals continues to be overwhelmed by the increasing number of animals being abandoned.

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?

No comment. Financial specialist needed here.

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

This Bill sets Wales once again in the lead in terms of animal welfare provisions and sustainable and ethical considerations regarding the future of Wales and its citizens, and will be aspirational for other countries to follow suit. I fully support the Bill and its explanatory memorandum.

I refer, though, finally to the above comment regarding how ‘greyhound’ is being defined. This is something that, I believe, deserves closer consideration should the Bill become law.

Many thanks for your consideration and work on this important Bill.

References

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——— ‘Justice and Non-Human Beings, Part II’, *Bangladesh Journal of Bioethics* (8:1), 2017, 44-77. ISSN 2226-9231 (print); 2078-1458 (online).

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Rebekah Humphreys, *Animals, Ethics and Language: The Philosophy of Meaningful Communication in the Lives of Animals*, Palgrave Animal Ethics Series (Switzerland: Palgrave, 2023).

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——— ‘Dignity and its violation examined within the context of animal ethics’, *Ethics and the Environment* (21:2), Fall 2016, 143-162.

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——— ‘Game Birds: The Ethics of Shooting Birds for Sport’, *Sport, Ethics and Philosophy: Journal of the British Philosophy of Sport Association* (published by Routledge) (4:1), Apr. 2010, 52-65.

RSPCA, ‘Briefing Document: Ending Greyhound Racing in Wales – July 2024’, [Wales Greyhound Briefing - July 2024.docx](#)

13 Oct. 2025

Senedd Cymru's Culture, Communications, Welsh Language, Sport, and International Relations Committee
Via: SeneddCulture@senedd.wales

Dear Committee members,

Re: the Prohibition of Greyhound Racing (Wales) Bill

I'm a Veterinary Professor of Animal Welfare affiliated with the three universities, including Murdoch University veterinary school & Griffith University, in Australia, and the University of Winchester, UK. I'm also an internationally-accredited Veterinary Specialist in Animal Welfare, and a Fellow of the Royal College of Veterinary Surgeons. I'm writing in support of the above Bill. Greyhound racing severely threatens the welfare of the dogs involved, thousands of whom are injured or die annually on UK tracks.

In 2018 I was commissioned to prepare a detailed report into the injuries suffered by racing greyhounds, and factors predisposing to these. I would like to tender this as written evidence, and enclose it. This report, along with a video summary under 4 minutes, is available at <https://www.andrewknight.info/reports/injuries-in-racing-greyhounds/>. I also have a short PowerPoint presentation summarising these concerns, that I'd be willing to present, if helpful. I have thus far been invited to present oral evidence as part of a panel.

Thank you for considering this Bill. Years of attempted reforms have failed to sufficiently protect racing greyhounds, and it is time this sport was banned, to protect the welfare of the dogs involved.

Yours sincerely,



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Enc:

- Knight A (2018). *Injuries in Racing Greyhounds*. <https://www.andrewknight.info/reports/injuries-in-racing-greyhounds/>.

Injuries in racing greyhounds



2018

Andrew Knight

ABOUT THE AUTHOR

Andrew Knight is a Professor of Animal Welfare and Ethics, and Founding Director of the [Centre for Animal Welfare, at the University of Winchester](#); a European and RCVS Veterinary Specialist in Animal Welfare Science, Ethics and Law; an American and New Zealand Veterinary Specialist in Animal Welfare; and a Senior Fellow of the UK Higher Education Academy. He worked in British small animal veterinary practice for many years, treating thousands of dogs with a wide variety of injuries, prior to entering academia. He continues to volunteer at veterinary charities.

ABOUT GREYT EXPLOITATIONS

This report is published by Greyt Exploitations, Cleveland, England. Contents of this report can be reproduced if credited. Please phone +44-(0)7958 729 798 for advice. Greyt Exploitations is a non-profit making organisation formed in 2008 and run entirely by volunteers. It strives to raise awareness of the cruel and inhumane treatment of greyhounds in the UK, and its research and investigation work has repeatedly been published in the national press and submitted to the Government during Public Consultations and Inquiries. This has helped it to effectively campaign for stronger protection laws for racing greyhounds and for gambling on dogs to be outlawed in Britain.

COVER IMAGE

Racing greyhounds struggling to stay upright whilst rounding a bend at Monmore Green race track in England, in 2010. Photographer: Graham Jones.

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1. Industry overview

Greyhound racing has taken place in the UK since the 1920s and the fundamental principles of the activity of greyhound racing, track layout in operational terms, remain largely the same. Although there has been a sustained decline in the sport's popularity in recent decades, it continues to draw crowds and supported a £1.3 billion off-course turnover for bookmakers in 2012-2013 (Deloitte 2014).

There are around around 15,000 active racing greyhounds in the UK today (EFRA 2016). They are raced anti-clockwise over the flat or hurdles around ovoid tracks, over distances of 210 – 1,105 m (Hercock 2010). A maximum of eight greyhounds can be entered into a race on GBGB licensed racecourses (GBGB 2018a). As of October 2018 there were 21 tracks licenced by the Greyhound Board of Great Britain (GBGB) – the industry regulatory body, as well as 5 independent tracks (Anon. n.d.).

The racing lifespan of a greyhound is short. Racing greyhounds start competing once they reach the age of 15 months, and they're usually raced weekly until made redundant due to poor racing performance, being past their prime at around five to six years of age, or after suffering a career-ending injury (Hercock 2010). The average racing greyhound is just two to three years of age.

2. Welfare Concerns

Welfare concerns centre relate to the 'wastage' of greyhounds in the industry, standards within kennelling, husbandry and transportation, and the injuries racing greyhounds sustain.

'Wastage'

Major welfare concerns relate to those dogs who are bred for racing, but never see the race track, and to those dogs that are retired from racing.

From 2018, the GBGB started to publish injury and retirement data online (GBGB 2018b). It reported that in 2017, 6,391 (86.32%) greyhounds were retained or rehomed, and 1,013 (13.68%) were killed or died a sudden death. However, there is no indication whether these figures included dogs that failed to make the grade at a trial, and they only related to GBGB licensed tracks.

Additionally, the House of Commons Environment, Food and Rural Affairs Committee (EFRA) (2016) recently voiced concern that "the fate of retired dogs unable to be rehomed at the end of their careers is unclear." They noted that in evidence supplied to EFRA, the Greyhound Forum¹ (2015) estimated that around 3,700 dogs are unaccounted for each year. This estimate was not dissimilar to that of APGAW (2007), which similarly considered numbers of greyhounds homed or rehomed and calculated that:

... a minimum of 4,728 dogs are unaccounted for each year and we can assume that the majority of these dogs are destroyed. However, this figure does not account for dogs from independent racing or those which are bred for the British racing industry in Ireland. These figures must therefore be regarded as conjectural and are likely to be a significant underestimation of the true scale of the problem of unwanted dogs being destroyed.

Associated concerns are the breeding of greyhound bitches too young, too old, or too frequently (Hansen 2017), and the conditions in which breeding bitches may be kept.

¹ Representing eight greyhound and canine welfare organisations

Kennelling, husbandry and transportation

Significant welfare concerns have been associated with the kennelling and standards of care applied to racing greyhounds. These may relate to space provided in kennels, lighting levels, exercise opportunities, sanitation, and diets, dental and veterinary care, including regular vaccinations and other preventative healthcare treatments (e.g. parasiticides). A three month detailed investigation into the conditions of Greyhound training kennels in the UK published by the Dogs Trust (2015) revealed that breaches of even the minimal standards extant within the GBGB minimum standards Rule 212 and CIEH Guidance on Animal Boarding Establishments Act 1963, were common. These included kennels heavily soiled with excreta and urine that appeared not to have been cleaned for days, thick layers of dust and cobwebs, and absence of any visible signs of cleaning or cleaning materials. Some facilities were in a poor state of repair, with sharp metal and wooden edges posing injury risks to dogs, rot and water damage causing roofing collapse and additional hazards, inadequate lighting, no visible firefighting equipment, filthy food preparation areas, and additional problems. This author has observed very similar conditions in other video footage taken from a British greyhound racing kennel (Appendix). Photographs illustrating the problems are available online².

Concerns also exist about the relative lack of normal socialisation and habituation opportunities for dogs born into the greyhound industry. Socialisation is the learning process whereby an individual pup learns to accept the close proximity of other dogs as well as members of other species. Habituation is the process it becomes accustomed to non-threatening environmental stimuli and learns to ignore them (Hansen 2017). The 2016 Special Commission of Inquiry into the Greyhound Racing Industry in New South Wales (McHugh 2016) concluded that if a greyhound is not sufficiently socialised or habituated it may pass on negative traits such as fear and anxiety to any offspring, which can make it difficult for the greyhound to be rehomed. GBGB statistics reveal that 27 per cent of greyhounds that died or were killed in 2017 were designated unsuitable for rehoming (GBGB 2018b). Accordingly, greyhounds should not be individually housed, and should be exposed to a wide range of socialisation opportunities and normal stimuli from an early age (Hansen 2017).

Racing greyhounds are also regularly transported to racetracks. To help minimise stresses associated with transportation, it is important to ensure that greyhounds are able to stand up at full height and turn around at all times. However, the GBGB (2018a) Rules of Racing only requires that travel cages "... must have the following dimensions: 35.56cm/14in width, 101.6cm/40in length, 76.2cm/30in height" although the GBGB notes these are only minimum permissible sizes. These dimensions do not allow for a greyhound to stand and adopt a natural posture, which contravenes EU regulations.

3. Injuries

As Hansen (2017) observed, "Greyhound racing is inherently dangerous. Greyhounds race at high speeds in conditions which make injuries almost inevitable."

In its report into greyhound welfare, the House of Commons Environment, Food and Rural Affairs Committee (2016) reported that "after prolonged conversations" the industry provided the death and injury statistics in Table 1 for 2012 – 2014. It should be noted that use of the term 'euthanasia' (e.g. in the Retirement form for GBGB-registered greyhounds³ - Fig. 1) is often misleading. By definition, euthanasia refers to killing that is not only humanely conducted, but also in the animal's best interests – typically due to very severe injury or illness when the prognosis for recovery is poor (AVMA 2013). Much killing of greyhounds is conducted for other reasons, e.g. lack of homes when racing careers end, and cannot be accurately termed 'euthanasia.'

² <http://greyexploitations.com/resources-reports/kennel-hand-speaks-out-as-the-greyhounds-voice/>

³ <http://www.gbgb.org.uk/uploads/pdf/GBGB%20Retirement%20Form%20June%202014.pdf>

Table 1: Injury and euthanasia data from GBGB tracks

Reported Numbers	2012		2013		2014	
	% of all raced dogs	Number of raced dogs	% of all raced dogs	Number of raced dogs	% of all raced dogs	Number of raced dogs
Euthanasia	0.12	441	0.13	461	0.13	393
Hock & Wrist injuries	0.19	687	0.19	643	0.21	693

Source: Racecourse Promoters Association

DEATH/EUTHANASIA OF A GREYHOUND
to officially report retirement, death or euthanasia of the above greyhound.

D) The above named greyhound has died or been euthanased

Date of death:

Details of death/euthanasia:

Natural causes / Sudden death (please state cause):

Euthanasia

- Unsuitable as a pet
- Terminal illness
- No home or retirement placement could be found
- On humane grounds due to untreatable injury or to cease suffering
- Injury not treated on economic grounds
- Other (please specify):

Was the greyhound euthanased by a veterinary surgeon?

Yes:

- At a GBGB-licensed racecourse

Name of racecourse:

Not at a GBGB-licensed racecourse

Name and address of veterinary practice:

Figure 1. Misuse of the term 'euthanasia' within the Retirement form for GBGB-registered greyhounds.

With respect to these data from 2012 – 2014, EFRA noted that: “The above data is not comprehensive as it is taken from 22 of 24 GBGB-licensed tracks, it does not cover all types of injuries, and it does not include injuries to dogs that manifest later away from the track.”

EFRA also noted that these data provided by the Racecourse Promoters Association are significantly lower than “an analysis provided by the welfare organisation Greyt Exploitations, in association with the Sunday Times, of incidents at races over a 10 year period [which] reported that 40,151 dogs were injured and 18,410 did not race again.” (Burgess 2015).

From 2017, the GBGB started to publish injury and retirement data online for GBGB licensed tracks. The numbers of injuries and track fatalities are included in Table 2.

Table 2. Injury and fatality data for 2017 on GBGB licensed tracks (GBGB 2018b).

	Total injuries	Injuries as % of 419,385 total runs
Hock injuries	843	0.20
Wrist injuries	707	0.17
Foot injuries	833	0.20
Hind long bone	48	0.01
Fore long bone	100	0.02
Fore limb muscle	540	0.13
Hind limb muscle	1,110	0.26
Other	656	0.16
Total injuries	4,837	1.15
Track fatalities	257	0.06

These rates do not appear to compare favourably with some international data. Sicard et al. (1999), for example, studied injuries sustained by racing greyhounds at five greyhound tracks in Wisconsin, US. In total, 1,887 orthopaedic injuries occurred during a two year period, within 43,260 official races. Eight greyhounds normally run in US races, giving a total of 346,080 greyhound starts – an orthopaedic injury rate of 0.55%. In contrast, the British injury rates reported by the GBGB (Table 2) were approximately double, at 1.15%. However, Sicard et al.’s study was limited to orthopaedic injuries, which may partially account for the discrepancy.

Causes of trackside deaths are indicated by a study of 87 greyhounds (61 male and 26 female) ‘euthanased’ at a GBGB registered track from June 2007 to August 2010 (Hercocock 2010). The three top causes were severe injuries sustained during racing (80), health problems resulting from racing (3) and behavioural problems such as aggression (11) (Fig. 2). Some dogs suffered from more than one of these problems.

3.1. Injuries: predisposing factors

Factors such as speed, race distance and track design (particularly turn radius of curvature, and degree of camber (banking)) can all significantly affect increase risks of musculoskeletal injuries (Sicard et al. 1999). Additional predisposing factors may include region, weather, individual dog behaviour and physical characteristics, and local regulations.

Such predisposing factors may be classified into greyhound factors, and track/environmental factors.

3.1.1. Greyhound factors

The lean, athletic physique of greyhounds, in conjunction with a number of less obvious musculoskeletal and physiological adaptations, have made them ideally suited as sprinters (Williams et al. 2009) (Fig. 3). These characteristics have been enhanced through many decades of selective breeding. Accordingly, greyhounds are able to maintain average running speeds of around 65 km/h, versus 29 km/h for human athletes (Von Boehn 2011). They are the fastest breed of domestic dog, capable of reaching speeds of up to 18 m/s during racing (Hercocck 2010).

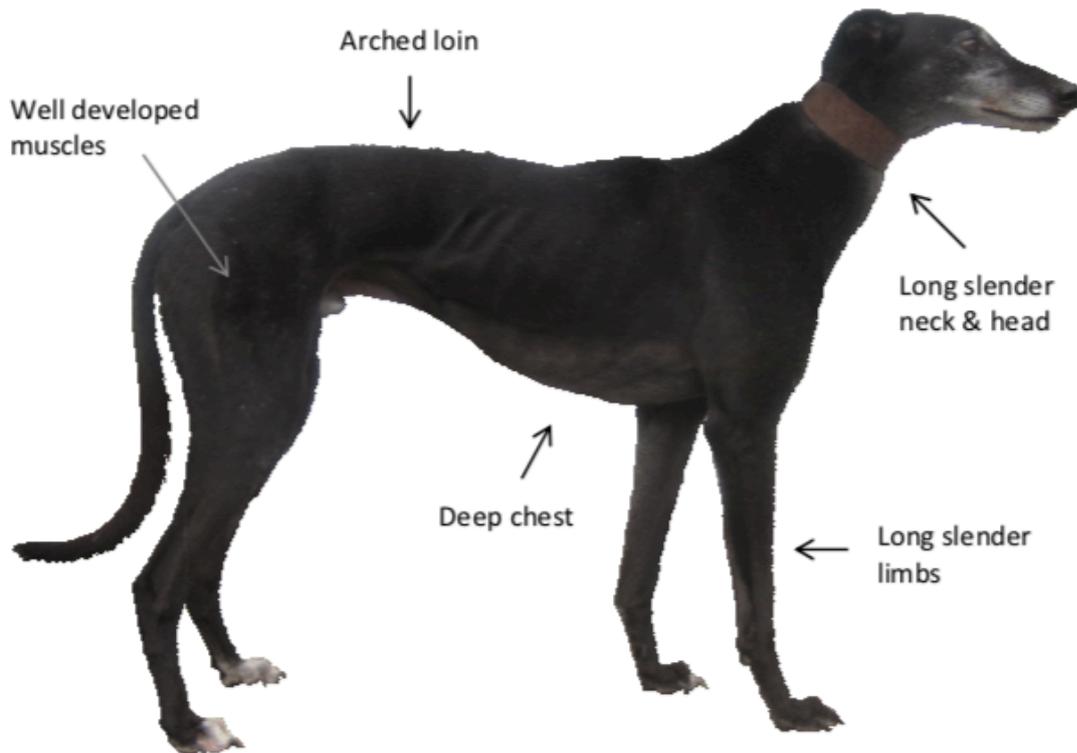


Figure 3. Some greyhound anatomical adaptations for speed (Burton, courtesy of Fay Penrose, in Hercocck 2010).

However, such speeds result in very considerable forces on the greyhounds' limbs. The 'ground reaction force' is comprised of three components: the vertical component supports the body weight, whilst the horizontal (fore-aft) and mediolateral (sideways) components allow the animal to accelerate, decelerate, manoeuvre and balance (Biewener 2003 in Hercocck 2010). Forces are affected by the weight and speed of the greyhound. As

speed increases, ground contact time decreases, and forces generated against the ground increase still further (Hercocock 2010).

Greyhounds have developed anatomical adaptations to these high forces, which include tendons in the distal limbs (ends of limbs) that are stronger and stiffer than in some other breeds. Their muscle-tendon units have a higher capacity for elastic energy storage, and an increased efficiency of energy recovery when compared to the Staffordshire Bull Terrier (Hercocock 2010).

Whilst racing, greyhounds are subjected to high rates of acceleration, speed changes, and – when rounding bends – both centripetal and other ground reaction forces (Bloomberg et al. 1998, Usherwood and Wilson 2005). Forces are affected by greyhound velocity and mass, and track radius of curvature. Bitches normally weigh 23 – 30 kg, and dogs 27 – 37 kg (Hercocock 2010). However effective body weight increases by approximately 71.0 per cent around bends, because body mass is subjected to both gravity and high centripetal acceleration. All four limbs experience an increase in peak force of approximately 64.5 per cent (Usherwood and Wilson 2005). Greyhounds transfer their weight to the left side of their limbs when they corner (Boemo 1998) (Report cover image). Hence their distal limb bones are loaded asymmetrically, with bones, and bony components, nearest to the inside of the track experiencing higher stresses (Fig. 4). As stated by Eager et al. (2017):

As races are run anti-clockwise, most injuries occur in the left foreleg and right hind leg. When negotiating a bend the left foreleg is used as a pivot, with the claws digging into the ground, whilst the right hind leg, moving in an arc, provides the primary propulsive force. The stresses and strains imposed on these two limbs when entering, negotiating and leaving a bend are the most important contributing factors to the specific injuries associated with racing greyhounds [Hickman 1975].



Figure 4. Greyhounds running anticlockwise transfer their weight to the left side of their limbs when they corner.

The asymmetric training and racing greyhounds undergo results in corresponding asymmetric anatomical adaptations, which were examined in detail by Hercocock (2010). Rail-side (inside, i.e. left) leg bones experience the greatest average forces. The skeleton seeks to adapt to these increased forces by resorbing calcium from some regions and depositing it in others (remodelling). The left distal limb bones have significantly increased bone mineral density and markers of bone metabolism. They also have localised changes in bone composition (e.g. trabecular architecture – referring to ‘spongy’ or honeycombed bone). Bones on the right side are conversely depleted of calcium (Hercocock 2010) – but are still subjected to severe stresses, especially during bends. Hercocock (2010) conducted a detailed study of fractures in racing greyhounds. Summarising her examination of fractures of the right central tarsal bone, she stated that:

... the fractured bones showed evidence of being hypomineralised (i.e. low mineral and high collagen content). These changes in the bone matrix and the asymmetries between the left (uninjured) and right (fractured) bones indicate an imbalance in the bone remodelling process has occurred leading to weakening of the bone and structural failure.

Rail-side bones (i.e. those within each limb that are closest to the inside of the track) also appear to undergo bony resorption as part of their remodelling. The likelihood of fracture can increase when bones are temporarily weakened during this process (Hercocock 2010).

Additionally, racing greyhounds have left to right asymmetries in the tensile properties of their pelvic limb (hind limb) tendons, with rail-side tendons being stronger, stiffer and returning more energy than those in the contralateral limb (Hercocock 2010).

Injury rates are also affected by greyhound age and weight. Young greyhounds (6 to 37 months) have a higher prevalence of metacarpal and metatarsal fractures (Bellenger et al. 1981, Ness 1993, Piras 2005), possibly due to lack of skeletal maturity and strength. Males are also more susceptible to these fractures than females (Gannon 1972, Ness 1993, Piras 2005), possibly due to their heavier weights (Hercocock 2010).

3.1.2. Track and environmental factors

The injury risks to greyhounds racing at speeds are significantly affected by track design and composition, and can also be affected by weather and track maintenance.

Track design

Curved tracks are hazardous, because of the uneven forces they create on greyhounds whilst negotiating bends, as described above. This places asymmetrical forces on limbs, increasing the loading of certain limbs.

Additionally, curves also create areas of congestion. When greyhounds round curves, they have two options for dissipating excessive forces acting on their limbs: they may slow down, or seek a larger radius of curvature. Either may result in congestion (Fig. 5).

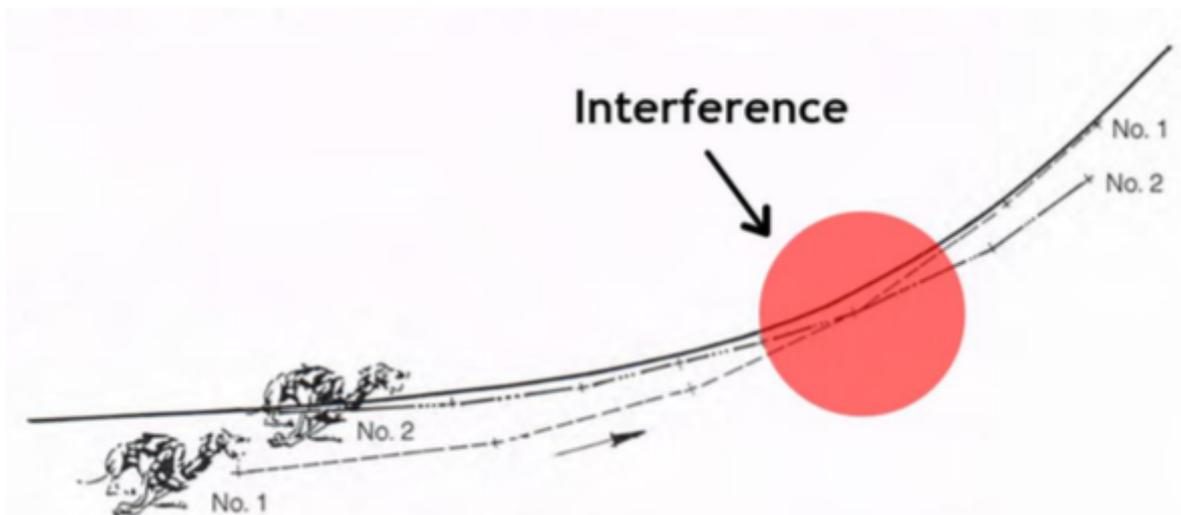


Figure 5: Zone of congestion during cornering (after Bloomberg et al 1998, in Eager et al 2017).

Congestion significantly increases risks of high speed collisions with other greyhounds, the rail or track surface. An inquiry undertaken by New Zealand's Racing Integrity Unit (RIU 2016) concluded that 68 per cent of injuries, and 75 per cent of fatalities, occurred from accidents at or approaching the first bend, when congestion is often at a maximum (Fig. 6).



Figure 6. Bends result in congestion, increasing risks of serious collisions.

Tracks of a larger radius, and steeper banking (camber) of curves, both reduce the degree to which greyhounds need to 'lean' inwards during cornering (Bloomberg et al 1998). This can decrease congestion risks, but results in faster speeds, with greater ground reaction forces. Unfortunately, many British tracks were designed many years ago when greyhounds were generally smaller and slower (APGAW 2007).

Track composition

In order for greyhounds to run with a smooth gait, the track surface should provide sufficient, uniform friction, without being so hard that injury risk is increased (Bloomberg et al 1998). In the US, track materials are a mixture of sand, silt, clay and water, which have varying particle sizes and mechanical properties (Gillette 2016). Their ratio determines impact absorption characteristics. For greyhound racing, the track surface should be resilient and have enough moisture content to dissipate impact forces (Bloomberg et al 1998). Ireland in Bloomberg et al. (1998) asserted that light-colored loam mixed with white sand is ideal. Gillette (2016) advises a 'sandy loam' or 'loamy sand' mix is optimal. Iddon et al. (2014) analysed injury data from a five year period at London's Rye House track, finding that a grass surface decreased injuries compared to a sand surface. Their analysis of data from a four year period at London's Walthamstow track also showed that fast track conditions significantly increased injuries. However, sand has almost completely replaced grass as a running surface on British greyhound tracks (APGAW 2007).

Moisture consistency influences compressive and shear strength. Moisture deficiency results in a hazardously hard track, and its excess decreases surface stability, with the result that sand may be thrown up into the eyes of following greyhounds (Bloomberg et al 1998). Toe injuries also increase (Gillette 2016). High ambient temperatures can evaporate track moisture and make the surface drier and harder. Prole et al. (1976), analysed two British tracks and concluded that in drier months, injuries were increased. They attributed this to the harder surface and associated faster running conditions (Prole 1976). Conversely, a drainage system is essential in controlling the scour and movement of surface material in the presence of heavy rainfall.

Track layers

The racing track is comprised of two layers (Fig. 7). The paw first penetrates the superficial absorptive layer, to briefly grip the deeper traction layer (Gillette 2016). The layer depths should remain even on both straight and bend sections (Figure 7.A) as depth variations are hazardous (Figure 7.B) (Gillette 2016).

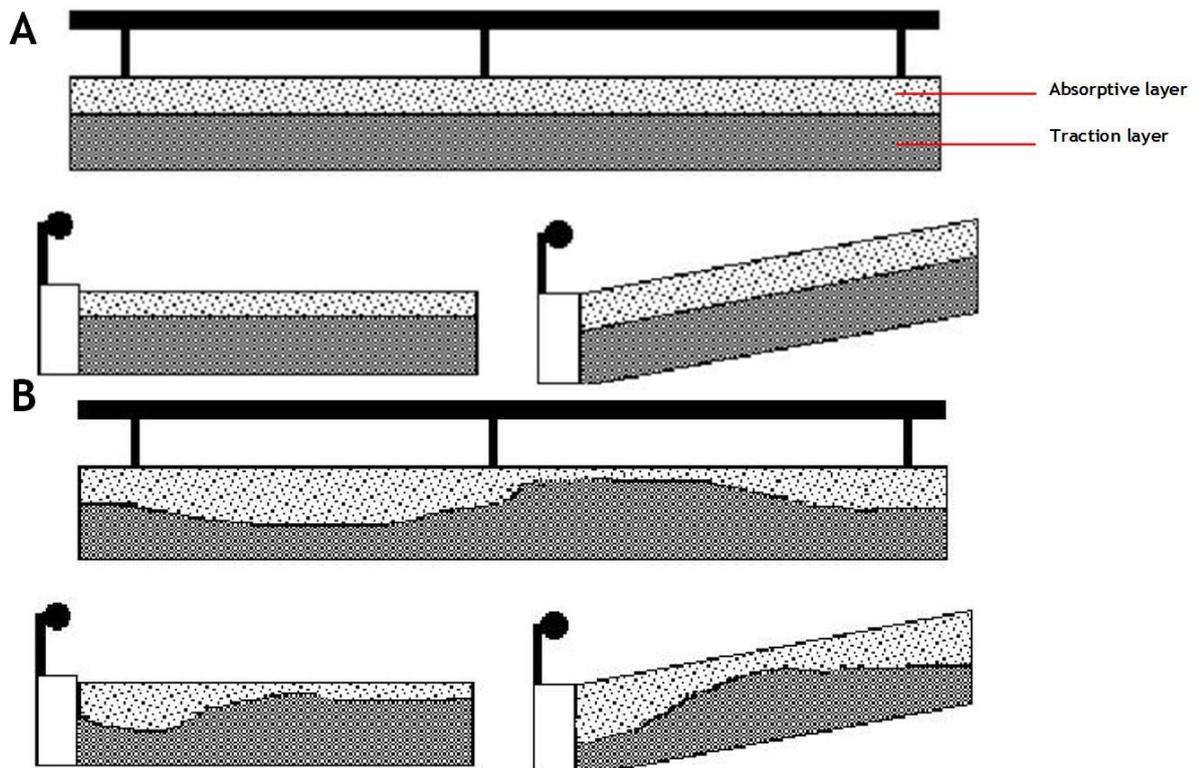


Figure 7: (A) The absorptive and traction layers of track surface. (B) An uneven absorptive and traction layers (Gillette 2016).

To analyse ratios of clay, silt, and sand, samples should be taken from different locations along the track. Two different depths are also recommended (Gillette 2016).

3.2. Injuries sustained

3.2.1. Fractures

Racing greyhounds are prone to fractures. Prole (1976) reported approximately 12.5% of injuries to the distal thoracic limbs (i.e. the front limbs), and 32.0 per cent of injuries to the distal pelvic limbs (the hind limbs), were fractures or dislocations. However, change of composition to sand tracks since then could impact injury rates.

Fractures and other injuries may result from trauma, as a direct and immediate consequence of high speed collisions with other greyhounds, the rail or track, particularly within congestion zones on bends. New Zealand's Racing Integrity Unit (2016) concluded that 45 per cent of fatalities result from dogs being checked while racing (Fig. 6). Of the remainder, most were injured as a result of faltering or simply going amiss during the running of a race for no apparent reason – although undetected injuries or health problems may contribute (Hansen 2017).



Figure 8. New Zealand's Racing Integrity Unit (2016) concluded that 45 per cent of fatalities result from dogs being checked while racing (meaning that the dog's stride has been broken).

Stress or fatigue fractures may also result without any external trauma, when locomotory forces at high speeds exceed biomechanical limits. They are much more common than direct, traumatic fractures (Hercocock 2010). Such stress fractures are rarely seen in companion dogs or other working breeds (Davis 1967, Hickman 1975, Molyneux 2005, Prole 1976), but are very similar to those seen in human athletes and military recruits (Armstrong *et al.* 2004, Beck *et al.* 2000, Brukner *et al.* 1996, Kowal 1980, Matheson *et al.* 1987).

Risks increase when locomotory forces increase, e.g. when rounding bends, or when biomechanical limits are lowered, e.g. in young bones, or following bony remodelling as described previously. Most injuries that occur in racing are minor injuries that may not be recorded, and continued racing with such injuries can also cause major injuries to occur (APGAW 2017).

Fractures may affect different parts of bones. Long bones such as the tibia are comprised of a series of layers (lamella), which make up an outer cortex, surrounding a marrow chamber. Bony fractures may be grouped into lamellar or cortical shaft fractures; avulsion or chip fractures; simple fractures; and compression fractures (Tab. 3) (Gannon 1972).

Table 3: Types of fracture in racing greyhounds (Gannon 1972).

Fracture type	Description
Lamellar or cortical shaft fractures	A true fatigue fracture usually associated radio graphically with evidence of progressive re-modeling of bone
Avulsion or chip fracture	When a small chunk of bone attached to a tendon or ligament gets pulled away from the main part of the bone
Simple fracture	A partial or complete loss of continuity of shaft of the bone
Compression fracture	A collapse of a vertebra. It may be due to trauma or due to a weakening of the vertebra

3.2.2. Muscle injuries

Muscle injuries ranging from sprains to tears are also common in racing greyhounds (Molyneux 2005). The muscles most prone to injury in the thoracic limbs are the triceps brachii muscle, which extends the elbow and flexes the shoulder, and in the pelvic limbs, the gracilis muscle, which adducts the limb (Davis 1973, Prole 1976). In British greyhounds the majority of gracilis injuries occur in the right limb (Prole 1976, Vaughan 1969).

3.2.3. Tendon and ligament injuries

These are also common, and vary from sprains to full disruptions (Molyneux 2005). These were summarised by Hercock (2010):

In the thoracic limb, injuries to the digital flexor tendons account for 69% of all injuries to the metacarpus (Prole 1976). Additionally, the majority of carpal fractures, in particular fracture of the accessory carpal bone, are associated with avulsion of various tendons and/or ligaments (i.e. the tendon/ligament has pulled off a fragment of the bone) (Johnson 1987, Johnson *et al.* 1988, Johnson *et al.* 1989, Whitelock 2001). Other tendon injuries seen in the thoracic limbs of racing Greyhounds include avulsion or rupture of the biceps brachii and brachialis tendons of insertion (Schaaf *et al.* 2009), displacement of the biceps brachii tendon of origin (Goring *et al.* 1984, Boemo and Eaton-Wells 1995), sprain of the flexor carpi ulnaris tendon of insertion (Johnson 1987, Dee *et al.* 1990) and sprain and/or disorders of the attachment sites of the short radial collateral ligaments (Guilliard 1998, Guilliard and Mayo 2000a).

3.3. Common fractures

The tibia is the long bone of the lower hind leg. The metatarsal and metacarpal bones correspond to those of the human foot and hand, respectively, and the tarsal and carpal bones correspond to those of the human ankle and wrist. The canine metacarpals are shown in Figure 9.



Figure 9: Greyhound forelimb with metacarpal bones shown in the middle (purple) (Grill 2016).

Common fatigue fractures sustained by racing greyhounds are those of the central tarsal and adjacent tarsal bones (Devas 1961, Dee *et al.* 1976, Boudrieau *et al.* 1984), metacarpal and metatarsal bones (Gannon 1972, Dee and Dee 1985) and the acetabulum (the socket of the hip bone, into which the head of the femur fits) (Wendelburg *et al.* 1988). Prole (1976) reported that 11 per cent of all injuries involved the carpus, and 6 per cent the tarsus. Sicard *et al.* (1999) reported 13 per cent of injuries involved the carpus, and 25 per cent the tarsus.

Right tarsal and metatarsal fractures

The most common severe injury, often leading to the dog being euthanased, is a fracture of the right tarsus (Hercocock 2010). This injury nearly always involves fracture of the central tarsal bone (CTB) and of one or more of adjacent tarsal bones (Gannon 1972, Hickman 1975, Boudrieau *et al.* 1984, Guilliard 2000, Hercocock 2010). The anatomically important CTB articulates with all six of the remaining tarsal bones (Miller *et al.* 1964). Severe fracture of the CTB accounts for approximately 4 per cent of all racing injuries (Gannon 1972) and is a common career ending injury in racing greyhounds (Hercocock 2010). Fractures of the metatarsals are also common.

These tarsal bone fractures are thought to be fatigue fractures resulting from repetitive loading during training and racing (Johnson *et al.* 2000, Tomlin *et al.* 2000). Propulsive forces during cornering whilst running anticlockwise result in the right hind limb being most affected. The relatively less mobile tarsal joint of the hind limb, when compared to the carpal joint of the front limb, is repetitively subjected to driving and thrusting action conducive to the production of lateral force. This results in simple fractures (Fig. 10) (Gannon 1972).



Figure 10. Metatarsal fractures (Specialists 2017).

Metacarpal fractures

Metacarpal fractures of the left foreleg are also common. The left front limb carries a greater proportion of weight during bends when running anti-clockwise (Gannon 1972). The pivoting action of the left forelimb, coupled with the relatively mobile carpal joint, produces shearing forces resulting in a range of fatigue and torsion fractures, that present as lamellar and compression fractures (Gannon 1972).

Tibial fractures

Tibial fractures are also common. These are most commonly avulsion or spiral stress fractures, due to a torsional moment caused by a rotational shear force (Fig. 11).

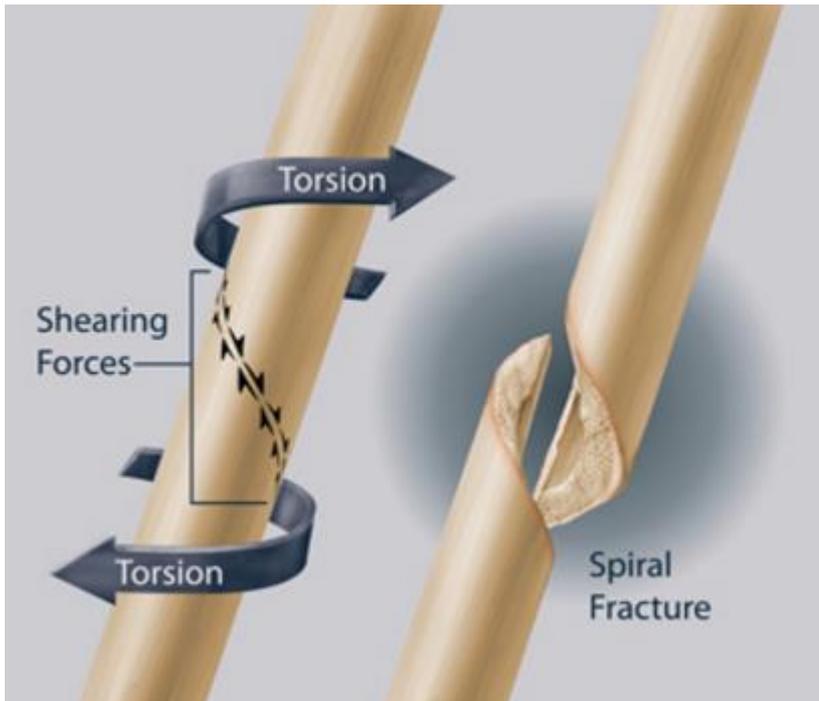


Figure 11: Mechanism of spiral/avulsion fracture (Szilagyi 2013).

Other common fractures

As reported by Hercock (2010), greyhounds are also prone to fracture of the right accessory carpal bone (Bateman 1960, Prole 1976, Dee and Dee 1985, Vaughan 1985, Johnson et al. 1988, Poulter 1991). This is usually associated with avulsion of one or more of the ligaments and/or tendons attached to this bone (Johnson 1987, Johnson et al. 1988, Johnson et al. 1989). This is believed to result from hyperextension of the carpus racing (Dee and Dee 1985). Guilliard and Mayo (2000b) determined that the forces acting on the carpus cause hyperextension of this joint by up to 270°.

4. Recommendations

Multiple factors relating to the design of greyhound racing tracks increase injury risks, but are amendable to modification. Interventions that would significantly lower injury rates include straightened tracks, shortened races, optimised track surfaces, lure extensions to position lures toward the middle of tracks, improvements to starting box design and positioning, delayed box opening, safety pads, and improvements to trackside veterinary facilities and services.

Straightened tracks

Oval tracks were designed in an era prior to high definition videography, to allow spectators equipped, at best, with binoculars, the best possible view of a racing pack. However, the bends within round or oval tracks, and the uniformly anticlockwise passage of greyhounds, create the greatest injury risks these animals are routinely subjected to. These result from areas of congestion within bends, as leading greyhounds slow or widen their radii of curvature. These create risks of high speed collisions and traumatic injuries to bones and soft tissues. Congestion, mostly within bends, results in approximately 80 per cent of catastrophic and major injuries (Eager et al 2017). And as described, stress fracture risks are increased by severe and uneven forces applied to distal limb bones, with characteristic, asymmetric injuries resulting.

These hazards can be greatly decreased or eliminated by the use of straight tracks. Modern technology is now able to provide live, high definition video to viewers, without geographical limitation. And in fact, alignment of moving cameras with the pack is actually likely to result in better visibility than traditional 'naked eye' or binocular viewing around oval tracks.

Shortened races

Races below 300 m in length have injury rates significantly lower than longer races (Hansen 2017). Accordingly, races should be limited to this distance. Beyond this distance, variations may not be statistically significant.

Optimised surfaces

The superficial absorptive and deeper traction layers of tracks should be of uniform depth, with both of an optimal composition, matched to weather conditions which may vary seasonally, e.g. by use of sprinkler and drainage systems. Tracks that are too hard result in higher speeds and greater injury risks. Tracks that are too soft are more likely to result in toe injuries, and sand being flung into eyes of following greyhounds (Gillette 2016).

Lure extensions

Positioning the lure towards the middle of the track may reduce congestion, and increase the useful field of vision for greyhounds. This can be achieved via an overhead track mounted carriageway, a heavy-duty rail mounted hoop arm system, or even, potentially, a drone-based lure system (Eager et al 2017).

Starting box design

Immediately prior to gate opening, greyhounds hear the distinct whirr of the lure and typically lower their heads in an attempt to observe its approach. This awkward pre-start crouching position is a contributing factor within a family of non-congestion related injuries. Racing is from a standing start, and warmup protocols are extremely limited. Accordingly, box gates should be of sufficient height to minimise this (Eager et al 2017).

Delayed opening

Delaying opening to allow the lure to increase from 50 km/h to 70 km/h would result in greyhounds observing it some 40 per cent further along the rail. This would expand their useful visual fields (Eager et al 2017).

Starting box positioning

The position of starting boxes should be examined, and repositioned when judged to be too close to the first corner (Hansen 2017).

Safety pads

In New Zealand, fitted safety pads have been installed on the outside fencing on all racing tracks. Wanganui was also reported in 2014 as is the first NZ club to install a durable PVC safety rail on the inside of the track. Its purpose is to flexibility and absorb impact when greyhounds collide with the rail (Anon. 2014). Such safety measures should be mandatory.

Veterinary presence and inspections

Greyhounds with pre-existing injuries are more likely to sustain fractures. However, GBGB requirements (n.d.) state that a licenced track veterinarian may be provided with only 45-60 minutes to examine multiple relevant bodily systems of 90 greyhounds. As the requirements note, this limits the thoroughness of examination. This is not acceptable. Sufficient time should be allowed to permit a pre-race veterinary examination that is thorough, and includes a comprehensive examination of the musculoskeletal system. Additionally, trackside medical supplies and facilities should be sufficient to ensure prompt and medically appropriate attention to any injuries or other veterinary medical problems that may arise.

5. Conclusions

The speed at which greyhounds race, and multiple aspects of track design, jointly create serious injury risks. However, numerous aspects of racetracks and procedures could be modified to reduce injury risk, including:

- straightened tracks
- shortened races
- optimised track surfaces
- lure extensions to position lures toward the middle of tracks
- improvements to starting box design and positioning
- delayed box opening
- safety pads, and
- improvements to trackside veterinary facilities and services.

It is entirely unacceptable that many thousands of greyhounds continue to be seriously injured whilst racing, and that many of these are killed. Accordingly, such modifications to track design and procedures are immediately warranted to reduce injury risks. These modifications should be deployed at all tracks uniformly, so that standardisation of equipment and procedures provide consistent (rather than confusing) messages to greyhounds, wherever they race. This will result in reinforcement of injury reducing behaviour over time (Eager et al 2017).

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Appendix

Statement evidencing housing and husbandry concerns in a British greyhound kennel in 2008. The kennel name has been redacted.

17 Aug. 2008

To whom it may concern,

██████████ Kennels

...

On 17 Aug. 2008 I viewed the DVD entitled 'Dogs: ██████████ Kennels: May 2008.'

I observed a considerable number (10-20) of kennels, some containing dogs that appeared to be greyhounds, while others were empty of dogs.

In general, the kennels were extremely small. None appeared to have outside runs or access. Very few, if any, had reasonable lighting, which was provided via overhead fluorescent lighting, or extremely small, high windows, some of which were shadowed by trees. Many kennels were in near-total darkness, which appeared likely to continue almost around the clock, because the lighting briefly provided for filming did not reveal any permanent light source for these kennels.

Dogs are highly social animals, with a range of physical and psychological abilities evolved for the purposes of exploring, foraging and interacting with one another and their natural environments, which can be wide-ranging. Greyhounds are particularly athletic dogs, with a particularly high capacity for exercise.

According to the narrator, the exercise provided was a brief daily trip to the 'exercise yard,' whilst the kennels were being cleaned. The yard was also small and barren. The ground was mostly bare dirt, which, in wet conditions, would have quickly become muddy, as described by the narrator. The large number of dogs using this small area would have resulted in a high level of faecal contamination, requiring daily cleaning of the yard to minimise disease transmission. There was no indication that cleaning occurred on any regular basis.

The lack of space, exercise and opportunities for socialisation, and the barren nature of both their kennels and the so-called 'exercise yard,' would have inevitably led to marked stress in these dogs. Over time such stress is likely to worsen, and is known to lead to psychopathologies such as behavioural stereotypies. Evidence of psychopathology was clearly visible, in the form of large holes chewed through wooden walls, which had been crudely covered with wire – through which contact between neighbouring dogs, with consequent risk of disease transmission, remained possible. The dogs revealed by torchlight appeared uniformly frantic for attention. Immunodepression, with resultant increased susceptibility to disease, is a common sequelae of such chronic stress.

The risk of disease outbreaks was exacerbated in this case by the very poor sanitation clearly visible within these kennels, and their poor physical condition. Debris was clearly visible on kennel floors and walls. There was no visible evidence that the narrator was incorrect in her assertion that certain areas – such as the area under dog 'beds,' are never cleaned. Dripping holes in kennel roofs were evident. Bedding appeared to be comprised of shredded newspaper, which was sometimes wet.

Very large piles (industrial quantities) of waste – presumably, bedding and other kennel waste – were visible. The narrator stated that these were destined for the local tip. In veterinary clinics such kennel waste is packaged as clinical waste and incinerated, to minimise disease transmission.

In short, the conditions in which these dogs were housed clearly violated their inherent requirements for space, natural light, exercise, environmental stimulation, social contact, and the opportunity to express natural behaviour. The kennels appeared extremely unsanitary, badly designed, and in a state of considerable disrepair. Housing

dogs for any extended period of time in such conditions is blatantly cruel, ethically inexcusable, and violates the duty of care required under the UK Animal Welfare Act 2006.

Yours sincerely,

Andrew Knight
Veterinarian

Agenda Item 4

Please use this template to draft your response and email your response to SeneddCulture@senedd.wales

Evidence from: Greyhound Board of Great Britain

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](#)

You do not need to answer every question, only those on which you wish to share information or have a view.

The following responses are provided by the Greyhound Board of Great Britain (GBGB)

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 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 our investigations team, we explore any concerns regarding welfare and integrity. We 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 our 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. We 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 our 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, we have 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, GBGB 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 our 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. GBGB does not have any comments on Section 3.

Schedule 1 of the Bill relates to Offences by bodies corporate etc. GBGB 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?

GBGB notes that Section 9(h) of Schedule 2 of the Bill prohibits Inspectors exercising a power of entry from seizing a dog. GBGB 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 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/c930gg9xv9no>

<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)?

GBGB 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 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 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 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 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 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 trialed 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>).

Please use this template to draft your response and email your response to SeneddCulture@senedd.wales

Evidence from: Racecourse Promoters' Association

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](#)

You do not need to answer every question, only those on which you wish to share information or have a view.

The following responses are provided by the Greyhound Board of Great Britain (GBGB)

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 of the Bill is to ban greyhound racing in Wales. As the Racecourse Promoters' Association (RCPA), we remain firmly opposed to the stated policy intention and general principles of the Bill on the basis that they will only risk harming greyhound welfare. The Bill focuses wholly on banning greyhound racing, instead of prioritising ways to promote and protect greyhound welfare, which would additionally lead to the unnecessary loss of jobs, livelihoods and other economic, cultural and social value for the community.

For background, the RCPA represents almost all licensed greyhound racecourses in Great Britain. Founded in 1988, the RCPA provides a platform to ensure the voices of racecourses are heard by the industry regulator. Members of the RCPA are all licensed greyhound racecourses, regulated under the Greyhound Board of Great Britain (GBGB), which currently offers a system in which greyhound welfare can be protected and promoted. We refer to GBGB's welfare strategy, '[A Good Life for Every Greyhound](#)', which ensures that under GBGB regulation greyhounds' welfare needs are met, across the Five Domains of animal welfare, across their lifetimes. We assert that effective regulation under GBGB offers the best way to safeguard greyhounds, rather than a ban through this proposed Bill.

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. We do not agree with this nor do we think this Bill provides anything to protect and promote greyhound welfare. As a group of racecourses licensed by the Greyhound Board of Great Britain (GBGB), we have a thorough understanding of the extensive processes in place to ensure the highest standards of greyhound welfare under the robust regulatory system GBGB offers. In contrast, we believe greyhound welfare would be least well protected were the sport to be banned in Wales instead of effectively regulated.

Indeed, the public consultation launched by the Welsh Government prior to the introduction of this Bill, on the Licensing of Animal Activities asked for views on what a licensing system for those involved in greyhound racing – such as trainers and owners of racing greyhounds – could offer. We remain of the opinion that such a licensing approach, rather than a ban, would support greyhound welfare.

Currently, the only greyhound racing track operating in Wales is the Valley Greyhound Stadium, one of our members, which is now licensed by GBGB – having successfully achieved its GBGB licence in August 2023 following considerable investment to upgrade its kennelling and veterinary facilities to meet the required standard. Were a ban to come into place, the protections offered by GBGB regulation would be removed; we have set out below just some examples of the ways GBGB-licensed racecourses, such as the Valley Greyhound Stadium, are currently able to safeguard greyhound welfare.

We do not believe it is in the interests of greyhounds should this Bill proceed and instead it appears to have been driven by the influence of a small but vocal proportion of animal rights activist groups, including those who are known to disseminate misinformation. If the Welsh Government is concerned with animal welfare, instead of ethical arguments about animal ‘rights’, we believe that they should legislate for a licensing scheme such as the one offered by GBGB instead of pursuing this misguided Bill.

Examples of the ways greyhound welfare is optimised under GBGB regulation:

As regulator, GBGB ensures that the welfare of racing greyhounds is of paramount importance within licensed racing. Through its 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. GBGB’s welfare strategy, ‘A Good Life for Every Greyhound’, was led by Independent Director Professor Madeleine Campbell (an EBVS® European Veterinary Specialist and a RCVS Specialist in Animal Welfare Science, Ethics and Law), seeking to further optimise the care and protection that 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.

The strategy makes clear the ways in which, as the sport's regulator, GBGB expects and requires all such stakeholders to fully engage in protecting and optimising the welfare of the greyhounds under their care across all stages of a greyhound's life: breeding, rearing, racing years and retirement.

Implementation of the strategy is well underway. Key elements include:

- Expanding veterinary expertise within the sport through the appointment of an Executive Veterinarian, who plays a pivotal part in directing the implementation of the strategy;
- Introducing a new field force of Regional Regulatory Veterinary Surgeons to work alongside the Executive Veterinarian and who now run the independent kennelling inspections of trainers;
- Providing a comprehensive continuing education programme on greyhound welfare for everyone in the sport, to optimise the care they are able to provide greyhounds;
- Engaging with expert independent academic partners to design, deliver and analyse data gathering and research programmes into areas such as genetics, nutrition and prevention and early detection of injuries;
- Leading an effort by international greyhound regulators to develop harmonised welfare policies and strategies.

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**.

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 its investigations team, GBGB explores any concerns regarding welfare and integrity and follows 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.

Through GBGB's 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 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, we have 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, GBGB 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 our 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 we have already set out in our answers to Question 1 and Question 2 of this consultation, the RCPA believes that these provisions as set out will not improve greyhound welfare and will instead greatly increase the risks to greyhound welfare in Wales. This is because greyhound welfare is currently protected and promoted by the robust regulatory system of GBGB, under which the Valley Greyhound Stadium operates. We would refer to the detailed examples of the ways in which GBGB regulation supports greyhound welfare at the Valley Greyhound Stadium, as set out in our response to Question 2 of this consultation.

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)'.

We are of the same view as GBGB that Section 2 of the Bill would inevitably also risk greyhound welfare because it would mean either that trainers would have to transport their greyhounds longer distances in order to train or race them across the border, or that activity would be driven underground by a ban.

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?

As per our responses to other questions in the consultation, the RCPA does not support the Bill nor the stated policy intention. We believe that greyhound welfare is currently well protected and promoted by the GBGB regulation of the Valley Greyhound Stadium, the only greyhound racing track in operation in Wales at present. To ban the sport would be to remove these protections, which would therefore be detrimental to greyhound welfare.

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?

As per our responses to other questions in the consultation, the RCPA does not support the Bill nor the stated policy intention. We believe that greyhound welfare is currently well protected and promoted by GBGB regulation of the Valley Greyhound Stadium, the only greyhound racing track in operation in Wales at present. To ban the sport would be to remove these protections, which would therefore be detrimental to greyhound welfare.

Section 5 sets out 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’.

We have been clear that a phased ban would be akin to an immediate one, as it would be in almost any sector or area of business. Our regulatory system of assuring and delivering on high standards of greyhound welfare relies on interdependent elements – including the work of veterinary surgeons, trainers and kennel staff, breeders, owners, racing officials, stipendiary stewards and a wider network of suppliers and dependents. Without confidence in its future, individuals and organisations involved in the sport would have no choice but to rapidly cease operations; livelihoods and all associated income would be lost with potentially catastrophic consequences for the lives of racing greyhounds because of the immediate pressures this would cause on homing centres.

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>).

The RCPA, along with GBGB and those within the licensed sector of our sport, share these concerns that the provisions of this Bill, if enacted, would jeopardise greyhound welfare because of the pressures caused by overwhelming homing centres, at a time when they are already struggling and at capacity.

We feel it important to note that under GBGB, there is an existing scheme to support racing greyhounds into their retirement – the Greyhound Retirement Scheme. Likewise, many GBGB-licensed racecourses supplement this with their own retirement support to help address the costs of homing racing greyhounds and safeguard their welfare long after their racing careers.

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

As per our responses to other questions in the consultation, the RCPA does not support the Bill nor the stated policy intention. We believe that greyhound welfare is currently well protected and promoted by GBGB regulation of the Valley Greyhound Stadium, the only greyhound racing track in operation in Wales at present. To ban the sport would be to remove these protections, which would therefore be detrimental to greyhound welfare.

There is no provision for the welfare of racing greyhounds, should this Bill be enacted, nor sufficient consideration of what support would be available to look after greyhounds and appropriately home them, especially given the job and livelihood losses which will result from this Bill for those currently caring for racing greyhounds.

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 RCPA 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 our responses to the previous questions in this consultation, the RCPA does not agree with the Bill nor the stated policy intention and the Bill, which focus exclusively on banning greyhound racing; we are firmly of the believe that this will only be harmful to greyhound welfare.

To ban the sport would be to remove the significant protections currently in place due to the GBGB regulation of the Valley Greyhound Stadium, the only greyhound racing track in operation in Wales at present; this would be greatly detrimental to greyhound welfare to say nothing of the losses to economic, social and cultural value within the local community.

The RCPA share the concerns of GBGB that the provisions of this Bill, if enacted, would also further jeopardise greyhound welfare because of the pressures caused by overwhelming homing centres, at a time when they are already, by their own admission, struggling and at capacity.

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 do not believe that the Welsh Government has carried out the necessary consultation or adequately worked with the RCPA, the Valley Greyhound Stadium or those impacted directly by this Bill. Whilst the Valley Greyhound Stadium has been represented on the Implementation Group, this Group has not yet had a chance to report back and so we question the decision to introduce this Bill at this point in time. We have concerns that the economic impact of this Bill have not yet been sufficiently explored or worked through, despite the Valley Greyhound Stadium providing information to support this work.

On behalf of those directly or indirectly employed by the Valley Greyhound Stadium, we feel it would be wholly inappropriate for this Bill to proceed without this due consideration and due diligence.

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 kennelhands, maintenance, camera and hospitality staff. Moreover, the assessment of SIS Limited, the media rights company with which

the Valley Greyhound Stadium holds its contract, is that the economic loss of a ban would be a minimum of £15 million over the next five years. Further losses can be extrapolated from GBGB's Economic Impact of [Greyhound Racing in the UK \(2022\) report](#). This highlights that UK-wide owners of greyhounds contribute around £24.2 million annually into the sport, which would be circa £1.27 million on an individual track basis.

GBGB regulation is offered at no cost to the Welsh Government and offers evidence-based, robust protections for greyhound welfare. In contrast, the Welsh Government proposes introducing a ban through this Bill which would only be detrimental to greyhound welfare and lead to employment, financial, cultural and social losses in an area of the country where it has been much needed and valued.

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

The RCPA shares the belief of the Greyhound Board of Great Britain (GBGB) that this Bill will be extremely detrimental to greyhound welfare. We wish to join GBGB in urging 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 GBGB.

Introduction

There were a number of highly misleading or wholly inaccurate claims made by the Cut The Chase coalition during their evidence session before the Culture, Communications, Welsh Language, Sport and International Relations Committee on 15th October.

Notably, Valley Greyhound Stadium began licensed racing in November 2023, however the majority of the evidence put forward by the Coalition related to their observations prior to this date.

We have set out below a detailed rebuttal of the inaccuracies we noted from the Coalition and look forward to giving further evidence to the Committee on 23rd October to show the value and impact of GBGB regulation of greyhound racing in Wales.

Injury and Fatality

1. *“Death rates have gone up this year”* – **Chris Burghes (Blue Cross)**

This is not correct. Firstly, data has not yet been published for ‘this year’ (2025). Secondly, the most recent data published for 2024 shows that the fatality rate remained stable from the previous year.

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

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.

3. **Incorrect Analysis of Data and Racecards**

“We then looked at incidents. We looked at what happened during the races—and that was based on the GBGB's own records, which is listed in the comments for each dog after a race—when dogs, for example, fell, and dogs couldn't complete their race with a recorded time. There were two categories. They either managed to reach the finish line after the timer stopped, or they didn't even reach the finish line. These incidents we then took apart. We counted them. There were 267 incidents altogether. We looked at the dogs that fell versus the dogs that couldn't finish the race for another reason. We also identified, in these adverse events or incidents, dogs that appeared to have finished their last race with a time, but were subsequently flagged either in withdrawal data or on the trial cards, and they basically returned after a period of lameness. Then, we basically looked at what the outcome was after these incidents. If the dog then didn't race, how long was the dog off from racing? Because racing is a commercial activity. Greyhounds are pretty much on performance-related pay. If they get put into a race, they earn an income already. So, it is in the trainer's and in the owner's interest that, if the dog's fit enough to race, they would race. [...]

“We then also tried to calculate—. Because our big issue with the GBGB's own injury data is that it's all expressed in 'per runs'. Obviously, we know that the greyhounds at the Valley track race on average 25 times, and what we're really interested in, when we're looking at the dogs, is what is the actual incidence of something inadvertently happening to a dog. So, we worked out, for all dogs that raced at the Valley track, the 367 incidents equated to 44 per cent annual incidence of they are involved in an adverse event. And when we literally looked at all the incidents that happened in the Valley-attached dogs, just in their Valley-attached runs, which is 85 per cent of all the runs, suddenly the incidence of that they are involved in an annual adverse event increased to 74 per cent. Now, the 74 per cent, that is not 74 per cent of dogs, because we certainly had multiple dogs in different injury categories that appear to have experienced an adverse event on several occasions during just that one year.” – **Dr Sibylle Kuonen (Greyhound Rescue Wales)**

There are many inaccuracies in this contribution, as well as a wholly improper analysis of data.

Contrary to Dr Kuonen's comments, racecard notations – upon which this analysis is based – are neither GBGB records nor records of a veterinary incident.

Racecard notations are part of the heritage of greyhound racing, with the wording and abbreviations used having developed over the last century of the sport in Britain. Racecards are *solely* intended to inform punters of how a greyhound performed during a particular race, for example, whether a greyhound ran closer to the rails, ran wide, made contact with another greyhound, or tripped over. Race cards are not used to indicate where an injury has occurred. As such, if a card notes 'fell' or 'knocked over' it should not be assumed that the greyhound has sustained an injury. It is also important to acknowledge that racecard notations are made at the discretion of each track's Racing Manager so, whilst every effort is made to ensure consistency between races, they can be subjective. It is therefore wrong to suggest these provide an evidence base for number, type or severity of any injuries sustained at the Valley.

Furthermore, the appropriate way of measuring the risk of injury or fatality to a greyhound is by assessing the total number of injuries or fatalities sustained compared to the total number of runs, as is presented through GBGB's independently verified annual data. Despite Greyhound Rescue Wales stating they have 'a big issue' with this presentation of data, this is in fact how DEFRA requests that data from greyhound racing be presented and is the most accurate way of assessing the risk to greyhounds.

The injury and fatality rates at the Valley are consistently in line with the national averages of 1.07% of runs leading to injury and 0.03% of runs resulting in a fatality. There is no evidence to suggest that the incidence of injury at the Valley is 74% as is claimed by Greyhound Rescue Wales. There is absolutely no factual basis for this whatsoever.

Finally, it is notable that the figures and statistics referenced by Greyhound Rescue Wales change throughout this evidence session. For example, initially they say they found 267 so called 'incidents' before claiming this number was 367. These figures are clearly untrustworthy and should not be relied upon as a basis for legislation.

4. *"It was only through our Amazing Greys project that we got into the track and we could see first-hand what those welfare issues were. That started in 2018, when we first went in. We were there for two years, then we had lockdown, and we still supported the track for another year after that, and that's when we really saw first-hand what those welfare issues were."* – **Vanessa Waddon (Hope Rescue)**
5. *"At the Valley track, back to the Amazing Greys data, when even I was present at the track, we did see a lot of hock fractures, where the greyhounds tend to break their right back leg, a certain specific bone, the central tarsal bone in the hock."* – **Dr Sibylle Kuonen (Greyhound Rescue Wales)**

The 'Amazing Greys' project which is referenced here, and at various other points throughout the hearing, is not an appropriate evidence base for this legislation. The project was conducted between 2018-2021, ending more than two years before the Valley became a GBGB-licensed stadium. Standards at the Valley have been transformed since then, thanks to over the investment of over £2 million to bring the track up to GBGB standards. These changes included improvements to the sight lines, installing padding at the bends, improving the track's composition, camber and radius, construction of improved kennelling facilities and introduction of veterinary facilities at the track, which is staffed by a veterinary surgeon for all racing and trialling.

6. *“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)**

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.

Regulation

7. *“There’s a lack of transparency regarding the industry practices and enforcement of regulatory standards as well”* – **Billie-Jade Thomas (RSPCA)**

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.

8. *“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)**

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.

9. *“The concerns we have with self-regulation in the licensed racing sector really relate to conflicts of interest, the adequacy of regulatory arrangements and the governance for greyhound welfare”* – **James Fitch (Dogs Trust)**
10. *“In reality, the UKAS certification does not provide an assessment of greyhounds or their welfare. It’s purely a document-auditing certification, which then, obviously, is removed from any assessment of greyhounds or that the document accurately reflects what is occurring or what has occurred at those tracks.”* – **James Fitch (Dogs Trust)**

GBGB’s regulatory scheme for both residential kennels and licensed stadia are accredited by UKAS. GBGB is, in fact, the only sports regulator to be accredited by UKAS for its regulatory scheme. Far from being a ‘document auditing certification’, in order to maintain UKAS accreditation all licensed stadia and residential kennels are subjected to an annual, independent inspection by external auditors.

Separately, it is in the interest of the industry to ensure the highest standards of animal welfare. Ensuring the highest standards of animal welfare not only ensures our greyhounds can enjoy racing, but also that spectators and those working in the sport continue to enjoy and support greyhound racing, confident in the knowledge that the dogs receive the best care both on and off the track.

- 11.** *“If you look at the welfare strategy, it says things like, 'Track design: we'll look at things like the use of salt on the track'. Actually, it's the bends and everything else that causes those pressures, and they're not prepared to do that or address it.”* – **Chris Burghes (Blue Cross)**

This is an incredibly misleading statement which undermines the considerable amount of work being done to improve track design and track maintenance. It is clear that Mr Burghes has not researched or noted any of the programmes which are in place to improve track construction and maintenance. These include:

- 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 employs a national Track Liaison Officer who provides advice and guidance 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 guidance on track construction includes evidence-based guidance on the optimal camber and radius for a track, mitigating the risks of racing at the bends which Mr Burghes raised.

Through this comprehensive programme of track improvement, among other regulatory schemes, the fatality rate has halved since 2018, and the injury rate reached a record low last year. By ignoring these achievements, Mr Burghes not only undermines the work of GBGB, but also his own arguments against the sport.

- 12.** *“I used to sit on the greyhound forum”* – **Chris Burghes (Blue Cross)**

While other representatives of Blue Cross have previously sat on the greyhound forum, Mr Burghes was never one of these representatives.

- 13.** *“We have not inspected the Valley stadium. But I think the important thing to mention here is we don't have statutory enforcement powers as the RSPCA. So, even if we were to go to the stadium, for example, there is no guarantee that we would be provided access.”* – **Billie-Jade Thomas (RSPCA)**

As the RSPCA has said here, they have not been called to inspect the Valley since it has become licensed, indicating that no concerns about the welfare of animals at the track have been reported to their inspectors. The Valley would, however, be more than happy to welcome the RSPCA to the track and show them the wide range of welfare measures in place for the greyhounds which race there.

Breeding

14. *“Estimations based on available data from 2017 to 2021—which was shared by the Irish Coursing Club through the registration system in Ireland and GBGB—suggests that around 10 to 20 per cent of those greyhounds cannot be accounted for after their first year” – Vanessa Waddon (Hope Rescue)*
15. *“The lack of transparency, specifically over the number of dogs being born in or imported into the UK, registered and entering the racing each year, their racing longevity and the clear exit data, is really challenging for us. Without this information, it's really challenging to understand the passage of individual greyhounds and what their welfare experience across the five domains within the UK greyhound racing industry is. So, with most dogs bred, reared and educated on private properties outside of the UK, there is little or no visibility of the whole-life experience of greyhounds in the UK racing on GBGB tracks, and even less for greyhounds racing in the independent sector.” -James Fitch (Dogs Trust)*

Neither GBGB nor the Welsh Government has any jurisdiction over the breeding and rearing of greyhounds in Ireland, despite this being discussed at length during the Committee hearing. Likewise, there is no British national register for the number of dogs of any breed being bred in the UK, marking another unequal standard to which greyhound racing is held.

However, despite this not falling under GBGB's remit, GBGB is undertaking significant work through its long-term welfare strategy to drive up standards in British greyhound breeding. GBGB is of the view that British breeding further optimises greyhound welfare, and has incentivised British breeding over the past several years leading to an increase in the number of registered racing greyhounds bred in Britain. In 2024, 15.5% of the greyhounds registered with GBGB were from British-bred litters (up from 13.1% in 2021). The overall number of Irish greyhounds entering racing in Britain has decreased by 26% since 2021.

For British-bred greyhounds, which fall under the jurisdiction of GBGB and in some cases the Welsh Government, there are a variety of schemes in place to ensure their welfare from birth all the way through to retirement and beyond. This includes free education opportunities for breeders and rearers, and an upcoming 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. GBGB expects to publish this code in the next few months.

To further enhance traceability, 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.

Retirement

16. *“We certainly have concerns about injuries, access to veterinary records, what sort of treatment these dogs have had. There are concerns about dogs that have come off the Valley track with parasites, that were underweight, and were basically not in what we would consider a good condition.” – Vanessa Waddon (Hope Rescue)*

Ms Waddon provides no evidence for her claims here.

Since becoming a GBGB licensed track, all greyhounds which race at the Valley must be registered with GBGB so that their welfare can be monitored throughout their racing careers.

Every racing greyhound is checked before and after they race by the onsite veterinary surgeon. If a greyhound sustains an injury at the track, the track veterinarian will provide any immediate first aid and, if needed, will issue a First Aid Treatment, Written Direction and Transport Certificate. This provides a provisional diagnosis of the nature of the injury, details of treatment given at the time of injury and instruction on the requirement for follow-up treatment within a specified timeframe. GBGB's team of Regional Regulatory Vets will follow up to ensure the required veterinary treatment has been obtained. Failure to obtain the follow-up veterinary treatment within the stated timeframe will result in disciplinary proceedings, as appropriate, being undertaken against the trainer.

When they retire, a retirement 'green' form must be completed for each greyhound indicating their intended retirement location. GBGB conducts regular checks on these greyhounds after their retirements. There are unfortunately rare instances where greyhounds are found not to be in their intended location when GBGB conducts these checks. In these cases, investigations will occur to determine the greyhound's location and whether any disciplinary action should be taken against those responsible for the greyhound.

All retired greyhounds entering approved homing centres must be spayed or neutered, and have any necessary veterinary or dental work undertaken before they can receive GBGB's Greyhound Retirement Scheme (GRS) funding. GBGB also has in place the Homing Information for Retired Greyhounds leaflet which advises trainers both on preparing their greyhounds for homing and sharing the relevant health and behavioural information with a homing centre or new owner. Likewise, GBGB's Welfare Team will liaise directly with homing centres to help access additional veterinary information should the centre have any concerns.

Summary

It is clear that some comments made by those opposed to racing have misled Members, with one member noting during the session that: *"It sounds a pretty grim life for these dogs, and there's a lot of uncertainty as to what happens... So, we don't really have a great deal of information about the kennel environment, or really much information about the conditions at the Valley stadium, or certainly with the dogs that have reached past their racing."*

The conclusions of this Member, based on the arguments of Cut The Chase, could not be further from the truth under GBGB licensing as set out above.

The Valley continues to extend an open invitation to Senedd Members who wish to see the site for themselves and reach their own conclusions. It is clear from anecdotal feedback from MSs who have attended the track have seen something entirely different than what they had been told by anti-racing groups. We hope that more Members will take this opportunity to ensure their decision is based on facts rather than conjecture.

Culture, Communications, Welsh Language, Sport, and International Relations Committee: Welsh Government's Call for Evidence: Prohibition of Greyhound Racing (Wales) Bill

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Welsh Local Government Association - The Voice of Welsh Councils

The Welsh Local Government Association (WLGA) is a politically led cross party organisation that seeks to give local government a strong voice at a national level.

We represent the interests of local government and promote local democracy in Wales.

The 22 councils in Wales are our members and the 3 fire and rescue authorities and 3 national park authorities are associate members.

We believe that the ideas that change people's lives, happen locally.

Communities are at their best when they feel connected to their council through local democracy. By championing, facilitating, and achieving these connections, we can build a vibrant local democracy that allows communities to thrive.

Our ultimate goal is to promote, protect, support and develop democratic local government and the interests of councils in Wales.

We'll achieve our vision by

- Promoting the role and prominence of councillors and council leaders
- Ensuring maximum local discretion in legislation or statutory guidance
- Championing and securing long-term and sustainable funding for councils
- Promoting sector-led improvement
- Encouraging a vibrant local democracy, promoting greater diversity
- Supporting councils to effectively manage their workforce



Overview

1.0 Introduction

- 1.1 The Welsh Local Government Association (WLGA) welcomes the opportunity to respond to the Welsh Government's Call for Evidence on the Prohibition of Greyhound Racing (Wales) Bill and recognises that the introduction of this Bill may have economic implications.
- 1.2 While we acknowledge that the closure of the Valley track will have implications for local employment, community activities, and may indirectly affect rural economies and small businesses connected to racing, we believe that other stakeholders are better positioned to provide detailed evidence on the broader economic impacts. Taking these factors into account, we recommend that transition support be considered for the communities affected. Accordingly, the Association has focused its submission on areas most directly aligned with local government regulatory responsibilities, particularly enforcement and the implementation of the Bill.
- 1.3 The Association supports the Welsh Government's proposal to prohibit greyhound racing in Wales, recognising the animal welfare concerns associated with the activity and the clear public and stakeholder support for such a measure. Nonetheless, local authority regulatory services, in particular trading standards and animal health officers across Wales have highlighted areas where the draft legislation could be strengthened to ensure that it is comprehensive, effective, and capable of being enforced in practice.

2.0 Scope of the Legislation

2.1 Limited Coverage of Associated Activities

- 2.1.1 The Bill focuses on the operation of racing venues and the organisation of races but does not currently address associated activities such as participation. Expanding the scope to include participation would help prevent circumvention or unintended loopholes and ensure the legislation is enforceable if illegal activities arose because of the ban.

2.2 Challenges in Identifying Organisers

- 2.2.1 Enforcement officers have raised concerns about the difficulty of identifying "organisers" in cases of informal or pop-up racing events. Including participation as an offence would improve enforceability and act as a stronger deterrent.

3.0 Enforcement Considerations

3.1 Local Authority Capacity and Support

- 3.1.1 The Bill implies that existing local authority officers, specifically within trading standards services, will have primary responsibility for enforcing offences contained in the Bill, with inspectors granted powers of entry, search, and seizure (though not of the dogs themselves). Effective enforcement will depend on intelligence-led



investigations, consistent collaboration with police, and adequate support for legal processes. However, the practicalities of this are unclear. Regulatory services such as Trading Standards and Animal Health are likely to face challenges in responding to illegal racing without adequate support or resources.

- 3.1.2 It might be beneficial to have national agreements developed with the police and relevant animal welfare organisations to set out clear roles, responsibilities, and processes. This would ensure consistent enforcement across Wales, strengthen inter-agency collaboration, and provide local authorities with the backing needed to act effectively. Alternatively, Animal Licensing Wales could provide a central support and expertise function for local authorities, as historically there is no intelligence to show a history of illegal greyhound racing. This would provide a more efficient enforcement support mechanism and be less onerous on individual local authorities. This would strengthen and compliment the evolving national model of licensing animal related activities.
- 3.1.3 Delivering these duties will place additional pressure on already stretched local government regulatory services. It is therefore essential that the Welsh Government works closely with local authorities to assess the scale and impact of these new responsibilities. A collaborative approach should be taken to identify the most efficient means of providing the necessary funding, training, and resources to ensure enforcement is both practical and effective. We recommend that the implementation plan includes clear guidance, comprehensive training, and appropriate resourcing to support the delivery of enforcement responsibilities.

4.0 Policy Development Context

4.1 Stakeholder Input

- 4.1.1 It is important to clarify that while local authorities contributed to the Welsh Government's targeted call for evidence in 2023 to identify gaps in existing legislation, they did not specifically request a ban on greyhound racing – see attached as **Appendix 1** - the January 2023 Directors of Public Protection Wales (DPPW) submission. The subsequent prioritisation of themes for consultation, including racing dogs, reflected a broader policy development process that drew on multiple sources, including public petitions, stakeholder engagement, and recommendations from the Senedd's Petitions Committee.

4.2 Missed Opportunities for Broader Reform

- 4.2.1 The DPPW response highlighted several gaps in current animal licensing legislation that were not progressed, including:
- a. Unregulated ancillary services linked to dog breeding (e.g. stud services, fertility clinics, semen sales).
 - b. The unlicensed dog grooming sector, where animal welfare concerns persist.
- 4.2.2 These areas remain relevant and warrant further attention in future legislative reviews.



5.0 Recommendations

5.1 The Welsh Local Government Association makes the following recommendations:

5.1.1 Broaden the scope of the Bill and revisit wider gaps in animal welfare licensing

The Bill should be seen as part of a broader strategy to modernise animal welfare legislation. Local authorities have consistently highlighted unregulated stud/fertility services, the dog grooming sector, and outdated licensing frameworks as pressing priorities. Revisiting these issues alongside the Bill would ensure a more comprehensive and effective approach to improving animal welfare in Wales.

5.1.2 Provide additional resources for councils

Local authority regulatory services cannot absorb additional responsibilities within existing budgets. Welsh Government should work with local authorities to assess the scale of need and provide funding for training, legal support, and inspector capacity. Without dedicated resources, the legislation risks being unenforceable and placing unsustainable burdens on already stretched regulatory services. Costed options should be developed to show how different models would operate in practice, including the implications for staffing, legal processes, and partnership working.

5.1.3 Establish national Memoranda of Understanding (MOUs)

National agreements should be developed with the police and relevant animal welfare organisations to set out clear roles, responsibilities, and processes. This would ensure consistent enforcement across Wales, strengthen inter-agency collaboration, and provide local authorities with the backing needed to act effectively.

5.1.4 Ensure local authority representation on the Implementation Group

Local authorities are at the frontline of enforcement and must be represented in the Bill's Implementation Group. Their input will help shape operational guidance that is realistic, proportionate, and enforceable, reflecting the on-the-ground experience of trading standards and animal health officers.

6.0 Conclusion

6.1 The Association supports the intent of the Prohibition of Greyhound Racing (Wales) Bill and welcomes the opportunity to contribute to its development, and local authority regulatory services are committed to supporting the effective implementation of legislation where it is evidence-based and proportionate.

6.2 We ask Welsh Government to work with local authorities to develop a properly resourced and realistic enforcement framework that safeguards both animal welfare and public confidence.

6.3 We also encourage the Welsh Government to consider amendments that will enhance the Bill's effectiveness and ensure it is practical to enforce.



Appendix 1



Welsh Government letter to local authority Chief Executives regarding Animal Related Licensing Overarching response of Directors of Public Protection Wales

Introduction

Directors of Public Protection Wales (DPPW) is the collective organisation of officers leading local authority public health protection services. These services fall into the three professional disciplines of Environmental Health, Trading Standards and Licensing, and together they safeguard the health, safety and economic wellbeing of our communities while at the same time seeking to protect the environment.

DPPW welcomes the recent Welsh Government request to local authority Chief Executives seeking feedback on the current legislative framework for the licensing of animal related activities, as well as on ideas for future improvement.

Animal welfare and animal related licensing are hugely important areas of work for Public Protection services, and all 22 local authorities take pride in the dedication and commitment of their staff working in often challenging conditions to deliver the very best possible outcomes. It is in this context that DPPW adds its endorsement of the animal welfare and licensing work carried out by local authorities in Wales and provides this over-arching response to the Welsh Government request for feedback.

The Welsh Government request

Welsh Government has requested the following information

- 1. What animal welfare licensing legislation your Officers are responsible for enforcing*
- 2. What issues your Animal Welfare Enforcement Officers face, both with the current licensing legislation in force and where existing legislation does not provide sufficient protection for a specific animal activity. Please provide as much evidence as possible to support your answer*

DPPW response to question 1

Animal welfare licensing legislation currently enforced



Depending on the animal related business activities carried out locally, there may be some variation between local authorities in respect of the legislation enforced. Nevertheless, the list below details the broad areas of legislation currently available to authorised officers. In addition to the Acts of Parliament listed, there are a number of pieces of secondary legislation in use.

- ***Animal Welfare Act 2006***

The Animal Welfare (Licensing of Activities Involving Animals) (Wales) Regulations 2021

The Animal Welfare (Breeding of Dogs) (Wales) Regulations 2014

- ***Animal Boarding Establishments Act 1963***
- ***Dangerous and Wild Animals Act 1976***
- ***Performing Animals (Regulation) 1925***
- ***Riding Establishments Act 1964***
- ***Riding Establishments Act 1970***
- ***Zoo Licensing Act 1981***

DPPW response to question 2

'Issues' and 'gaps' associated with the animal licensing legislation currently enforced

It is noticeable from the above list just how long ago the majority of animal licensing law came into force. It should come as no surprise that such aged legislation is often outdated with no account having been taken for developments over time. Using just one example to illustrate, the sixty-year-old Animal Boarding Establishments Act 1963 is based on the very traditional concepts of animals being boarded in kennels and catteries while their owners are away on holiday. In contrast, pet owners of the 21st century often demand home boarding arrangements and even dog day care or dog 'creche' facilities while they are out at work. While this can be a positive development in terms of recognising the welfare needs and demands of pet ownership, the law has not kept up with developments.

Examples of inflexibility arising from long established animal licensing legislation result in rigid calendar year licensing cycles being required. Again, using the Animal Boarding Establishments Act to illustrate, licenses run from January to December with no facility to charge the licence fee pro-rata for part of the year. As well the clear burden that this places upon licence holders, this rigid approach places unnecessary pressure on local authorities to inspect all premises across a very tight timeline in the run up to 31st December each year. In contrast, annual renewals based on the original



date of granting a licence and the ability to become licensed as needed for part of the year would serve to alleviate this pressure. Likewise, some element of risk-based inspection for individuals renewing their licences could allow much smarter targeting of local authority resources than continuing to conduct inspections of all licensed premises each year.

The following specific observations are also made:

1. Riding Establishments Acts 1964 and 1970

Currently this area of law has a narrow focus on standard riding school activity. It is suggested that new legislation could provide a much broader application to other equine related activities to ensure that animal welfare requirements are being met. Examples in this context would be the use of donkeys for rides on beaches or at summer shows and also in the provision of taxi / carriage services.

Diseases such as equine Influenza and strangles pose significant risks within the industry. The law could be updated through screening requirements to better protect horses being taken from or into horse riding establishments.

2. Dog Breeding

A series of high-profile prosecution cases have been taken against illegal dog breeders by local authorities. During the course of some of these investigations it has become apparent that those involved in dog breeding are finding ways to engage in allied activities that currently don't fall within the remit of that which requires a licence.

This 'pushing of the boundaries' includes the provision of stud services, fertility testing, the sale of semen and artificial insemination, none of which fall within the scope of licensable dog breeding activity. A review of this stance would be welcome in order to regulate these novel ways for individuals to benefit from the breeding of dogs without requiring a licence.

Investigations have identified cases where irresponsible breeding, driven by profit, results in the passing on of inherent illness / genetic defects, and there is a school of thought that the issuing of a dog breeder's licence should be contingent on the applicant being able to demonstrate that all bitches and stud dogs are fit to breed.

Unfortunately, the six-month time limit for commencing proceedings under the Animal Welfare Act 2006 poses a significant challenge in the successful progression of cases. This will be so in the more straightforward cases against dog breeders but is

particularly problematic in the context of large or complex investigations and where in addition to offences for unlicensed dog breeding, proceedings are taken under sections 4 and 9 of the Animal Welfare Act 2006 (causing unnecessary suffering and failing to meet welfare needs).



3. Animal Boarding Establishments Act 1963

As previously mentioned, (on page 2 of this response), this legislation is dated, and out of step with the modern pet care sector. A review of the legislation could enable this to be rectified by recognising dog day care and similar services, while at the same time addressing other deficiencies in the licensing of pet care facilities. Of particular concern in this context is the fact that the 1963 legislation makes no provision for the mental stimulation and enrichment for boarded animals.

4. Performing Animals (Registration) Act 1925

This legislation requires only the registration of animals rather than for the licensing of individuals. Nevertheless, it would appear that more and more animals are being used for commercial gain in this context, including for example, making horses, donkeys, llamas, alpacas etc. available to be taken out for a walk.

This area of the law could be strengthened by moving to a scheme of licensing rather than registration, with a requirement for inspections of animals to be carried out in their kept environment and when performing, to ensure that welfare needs are being met.

5. Activities currently falling outside the scope of animal licensing

It is hoped that as part of this area of work, Welsh Government will review all animal related activities to identify those currently falling outside the scope of animal licensing. It is suggested that charities, rescue centres, animal sanctuaries, private collectors, dog walking and dog / cat grooming services should be scrutinised with a view to their being subject to licensing and an associated inspection regime for standards of animal welfare.

6. Zoo Licensing Act 1981

This Act similarly is outdated and enforcing its provisions can be challenging. The UK Government is currently reviewing the Zoo Licensing Act 1981 as part of its Animal Welfare (Kept Animals) Bill but the proposed amendments do not go far enough to improve this piece of legislation.

The welfare of the animals and public safety are the primary objectives of the Act, yet one of the challenges facing a local authority is the ability to effectively enforce conditions and directions, including closure directions, in a timely manner. No local authority takes the decision to issue a closure direction lightly. However, in a case where a Welsh local authority issued conditions as well as directions, including closure directions, to bring a zoo into compliance, the licence holder challenged and appealed these conditions/instructions at every stage resulting in lengthy litigation that spanned several years.



The legislation provides the licence holder with an “opportunity to be heard”, which (unhelpfully) is not defined in the Act, as well as a 28-day period of appeal to challenge any conditions and/or directions made by the local authority. Enforcing the Zoo Licensing Act can therefore result in lengthy litigation especially when the licence holders challenge and appeal the local authority’s decision to issue conditions and/or directions.

As well as being a drawn-out process, appealing through the Magistrates Court can also be an expensive process. UK Parliament is proposing an amendment to the Act that will enable appeals to be heard at first tier tribunals in England. However, no such amendment is currently being proposed for Wales. It is important to note that when local authorities take enforcement action, the financial burden may be great because in some cases, the responsibility for managing the zoo and for the welfare of the animals, transfers to the local authority. It would be useful if additional hardship funding could be made available to local authorities in such exceptional cases.

The Act could also be updated by introducing a “fitness test”. Currently a person applying for a zoo operator’s licence requires no specialist qualifications or prior experience of operating a zoo or handling exotic and/or dangerous wild animals. This poses a risk to both public safety and animal welfare, and it is suggested that having a basic level of competency should be a minimum requirement.

7. Other observations

In any modernisation of animal licensing law, consideration should be given to the introduction of fixed penalty notices as an additional enforcement tool, for example in respect of trading while unlicensed.

As part of its commitment to promoting the highest standards of animal welfare in Wales, Welsh Government may wish to review the appropriateness of individuals being able to give pets (including goldfish) as prizes. A number of Welsh Councils have taken positive steps to prohibit this practice on any local authority owned land, but there is no such restriction in respect of non-council owned land in Wales. In Scotland, the giving of animals as prizes is prohibited by section 31 of the Animal Health and Welfare (Scotland) Act 2006, whereby a person commits an offence if they, other than in a family context, offer or give an animal to another person as a prize.

Conclusion

DPPW is grateful for the opportunity to contribute to this request for feedback and looks forward to playing a key role in taking this agenda forward.

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ORIGINAL ARTICLE OPEN ACCESS

Rights, Pains and Illusions: The Experiences of Welsh-Speakers at Wales' 'Flagship' Prison

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ABSTRACT

This article challenges claims of 'inherent' bilingualism in Wales' largest prison, HMP Berwyn. Drawing on semi-structured interviews and extensive documentary research, we find that Welsh-speaking prisoners at this 'flagship' prison have experienced widespread neglect of their needs and overt interferences with their use of the Welsh language. In light of these findings, we highlight the illusory nature of Welsh language rights and reveal that prisoners endure their own identity-specific 'pains' because of these failures. Our research reinforces the need for criminology to take seriously the UK's multi-national, post-devolution landscape and further underlines the importance of exposing utopian prison agendas to meaningful scrutiny and critique.

1 | Introduction

The Welsh Language Act 1993 is widely regarded a 'landmark enactment' (Watkins 2012, 191). Introduced by the UK Parliament following decades of determined campaigning by activists and communities,¹ it established a principle that public bodies in Wales should treat the Welsh and English languages on the basis of equality. Having been previously banned from official use for four centuries,² neglected and subjected to various forms of 'subtle oppression' (Madoc-Jones and Buchanan 2004, 227),³ this was a significant advance for the Welsh language. For other minority languages across Europe, Welsh thereafter was 'regarded with envy', with legal protections introduced in other territories 'closely modelled' on those set out in the 1993 Act (Huws 2006, 147).⁴

Significantly, the Welsh Language Act 1993 extends to the Welsh prison estate, a system comprising five prisons that currently hold around 5300 prisoners. Since its enactment, the UK Government has unveiled various commitments to deliver upon its legal obligations for Welsh-speaking prisoners. In its first Welsh language

policy for prisons in 2013, it vowed to provide 'bilingual provision and services' and remove 'obstacles ... which inhibit the use of Welsh' (National Offender Management Service 2013, 6, 7). In its most recent scheme, the UK Government refers explicitly to a 'right to use Welsh' for both prisoners and staff (HM Prison and Probation Service 2020, 4). Unsurprisingly, Welsh is now widely perceived to occupy a privileged legal position among non-English languages within UK prisons (Hunter et al. 2022).

The UK Government's Welsh language policies do not apply to the same extent in England, however (HMPPS 2020). Previous research has also consistently drawn attention to the restrictions and difficulties experienced by Welsh-speakers held in English jails (BBC News 2012; Hughes et al. 2012; Madoc-Jones 2007; Welsh Language Commissioner 2018). Combined with further protections for the language introduced by the Welsh Parliament/Senedd Cymru (hereafter 'Senedd'), a consensus has emerged that Welsh-speaking prisoners fare better when held in Wales (House of Commons Welsh Affairs Committee 2007, 2015, 2019a; Welsh Language Commissioner 2018). This was a key justification behind the construction of the UK's largest

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prison—HMP Berwyn, in north Wales (opened in 2017)—and remains prominent in discussions around the ‘need’ for further prison capacity in Wales (Melangell 2024). The effectiveness of Welsh language protections inside Wales’ prisons, however, has received insufficient attention to date. Despite high-profile examples over the years of Welsh-speaking prisoners being denied their basic rights when held in Wales (Daily Post 2012; Shipton 2009; Welsh Language Commissioner 2018; IMB 2020), the ‘better in Wales’ view has remained intact.

In this article, we draw upon multiple data sources to scrutinise and challenge the claims behind the UK Government’s Welsh language policy. In doing so, we seek to provide a more detailed, critical and empirically informed understanding of this issue. While prison research on language issues remains sporadic (Gallez 2018), this does not diminish its importance. Language is not only about communication; it is an expression of personal autonomy, cultural identity and membership of a community (Morales-Gálvez 2022). It is also a critical component of penal power, conditioning every aspect of a prisoner’s daily experience. Therefore, although our focus is a small section of the prison population, this research is neither ‘provincial’ or ‘parochial’. Rather, the experiences of Welsh-speaking prisoners can inform multiple areas of international prison scholarship: the distinct ‘pains’ facing linguistic minorities in prison (Diaz-Cotto 2006), the limitations of prisoner rights (Armstrong 2018), as well as critical research agendas that seek to expose the ‘fiasco’ of the prison when measured against its own stated aims and purposes (Jones et al., 2024; Mathiesen 1990, 141).

The article begins by locating Welsh-speaking prisoners within existing literature on disparate prison experiences, with a particular focus on the ‘pains’ facing minority language-speakers. In the next section, we introduce readers to the relevant legal frameworks applicable to the use of Welsh in the Welsh prison estate. We then make the case for our interview-based methodology, drawing particular attention to the paucity of official Wales-only data, before providing our analysis of documentary sources and interview data drawn from a small sample of Welsh-speaking former prisoners. Finally, we set out the wider implications of this study for future academic research and policy debates.

Our principal finding is that Welsh-speaking prisoners in Wales’ ‘flagship’ prison, HMP Berwyn, have experienced neglect of their language needs and overt interference with their use of the language by prison staff. Despite the protections offered by UK legislation, the Welsh language at Berwyn is evidently not treated on the basis of equality with the English language. Indeed, in light of the interviewees’ accounts, we contend that the language ‘rights’ available to prisoners are often *illusory* in practice. The reality is that these prisoners often experience the same pains as other minority language speakers: the loss of autonomy to live unimpeded through their first or preferred language, feelings of alienation and exclusion, along with the burdens imposed by a criminal justice system often indifferent or hostile to their communication needs.

Our research also points to an additional ‘pain’ rooted in legal rights and reforms that have failed to deliver real improvements to prisoners’ lives. Having been led to believe that Berwyn would be a prison predicated on respect for Welsh language rights,

those we interviewed for this study described feelings of frustration, anger and disappointment at the reality which they had experienced. Welsh-speaking prisoners, in short, have endured their own ‘pains of hope’ (Armstrong 2018; Annison and Condry 2022). The research thus offers a timely reminder that utopian prison agendas need to be exposed to meaningful scrutiny and critique.

2 | Disparate Pains and Prison Experiences

The work of Gresham Sykes (1958) remains *the* authoritative starting point for intellectual excursions into the complex social world of the prison. By far the most significant and enduring contribution made by Sykes is his framing and understanding of ‘pains of imprisonment’. In seeking to capture the ‘infinite power’ of the prison, *The Society of Captives* charts the ways in which relations between prisoners, with staff, or the ‘vast body of rules and commands’ that regulate prison life, expose prisoners to a series of identity-shaping losses, deprivations and pains (Sykes 1958, 75). Not only banished from society and confined *to* the prison, Sykes (1958) helped a generation of scholars to comprehend the ways in which prisoners are simultaneously confined *within* the social arrangements of the prison itself.

In the succeeding decades, a ‘second generation’ of studies has sought to build upon Sykes’ analytical framework. While the infliction of ‘suffering and pain’ remain central features of critical prison scholarship (Moore et al. 2018; Scott 2008, 168), multiple studies have contributed towards a more fine-grained understanding of prison institutions and prisoners’ experiences of imprisonment (Crewe 2009; Warr 2023). This research has challenged the view that prisoners, and their experiences, are homogenous.

Arguably, the most significant body of literature surrounds the experiences of different population sub-groups. In a range of areas, scholars have uncovered a series of identity-specific pains of imprisonment. Studies on racial identity, for example, have highlighted the ways in which prisoners routinely encounter racial harassment, verbal abuse, derogatory comments and bullying (Cheliotis and Liebling 2006; Genders and Player 1989). Research has also uncovered the ‘unequal hardship’ facing Gypsy, Roma and Traveller communities (Gavin 2019, 141; MacGabhann 2011); the ‘subtle’ forms of discrimination experienced by Muslim prisoners (Earle and Phillips 2013; HMI Prisons 2010, 20); and the added isolation and separation experienced by Indigenous populations in jurisdictions worldwide (Atabay 2009; Grant 2016).

Central to this article, studies have also revealed the distinct pains faced by linguistic minorities. In the United States, research by Diaz-Cotto (1996, 130) observed a clear ‘class structure’ between Spanish and English-speaking prisoners. While English-speaking prisoners were housed in an area of the prison with greater access to the most ‘prestigious’ jobs that offered higher wages, Spanish-speaking prisoners were often held in much poorer living conditions (Diaz-Cotto 1996, 129). In a later study, Diaz-Cotto (2006, 191) found that Spanish-speaking prisoners often felt they were ‘more harshly’ treated by prison staff because of their distinct linguistic identity.

An increasing body of research into the experiences of foreign national prisoners has further contributed to our understanding of the problems facing linguistic minorities. These difficulties include experiences of linguistic exclusion, with prisoners regularly unable to communicate effectively with fellow prisoners or staff, which often heightens their sense of frustration and ‘social isolation’ (Brouwer 2020, 709; Ugelvik and Damsa 2018). According to Croux et al. 2023, 253), linguistic exclusion not only ‘exacerbates’ or compounds the more universal or generalised pains facing prisoners but represents a ‘distinct and separate pain’ for foreign national prisoners.

Existing research into the Welsh language and the experiences of Welsh-speaking prisoners lends strong support to the linguistic pains of imprisonment literature. Two decades ago, Madoc-Jones and Buchanan (2004, 365) argued that the criminal justice system in Wales was characterised by ‘the deeply engrained institutionalized discrimination of the Welsh language’, with ‘Welsh-speaking offenders experiencing an inferior justice system than first language English speakers’. In a study on both Welsh-speaking and non-Welsh-speaking (Welsh) prisoners’ experiences in England, Madoc-Jones (2007, 15) found Welsh-speakers often experienced a heightened sense of ‘alienation’ and were more likely to report being ‘looked down upon’ by prison staff when compared to non-Welsh-speaking prisoners. Research on Welsh-speaking young offenders held in England also found that prisoners felt ‘isolated and under threat’ when held in an ‘unfamiliar linguistic environment’, with prisoners often experiencing bullying and forms of intimidation from other non-Welsh-speaking prisoners on the basis of their distinct linguistic identity (Hughes and Madoc-Jones 2005, 378). The unfamiliarity faced by Welsh-speaking prisoners is often caused or compounded by the fact that there is ‘no provision’ for Welsh-speaking prisoners in England. This includes the absence of Welsh-speaking staff (HMI Prisons 2015; Jones 2017), as well as other provisions such as literature, newspapers or religious services—the latter even though such resources are often ‘available in other languages’ (Welsh Language Board 2007, 89).

While the pains described by those researching foreign national prisoners mostly relate to social exclusion and alienation (Brouwer 2020; Croux et al. 2023; Ugelvik and Damsa 2018), a distinct theme surrounding Welsh-speaking prisoners concerns overt staff interference. Examples include cases where Welsh-speaking prisoners in England have been prevented from sending letters in Welsh (Inside Time 2021), speaking Welsh with relatives during prison visits, as well as attempts to stop prisoners using Welsh on the telephone (BBC News 2012; Welsh Language Board 2007).

An inquiry by the House of Commons Welsh Affairs Committee (HCWAC) in 2007 also heard that Welsh-speaking prisoners in England have been prevented from speaking in Welsh by staff. While members of Parliament were told that this is often justified on the grounds of ‘security issues’, the Committee (House of Commons Welsh Affairs Committee 2007, 36) described this practice as ‘nonsensical’ and ‘wholly unacceptable’. In a study by Jones (2017, 204), Welsh prisoners recalled witnessing prison staff in England actively attempting to stop prisoners from speaking Welsh on prison landings on the basis that they were ‘not in a Welsh prison’.

Although limited in size and scope, existing research into the experiences of Welsh-speaking prisoners supports the theory that linguistic minorities experience their own distinct pains of imprisonment. Over the last three decades, these findings have contributed to wider debates over the future of the Welsh prison estate and language rights. With much focus on Welsh prisoner experiences in England, however, this research has tended to encourage the view that Welsh prisoners would receive greater support if they were held in Wales ‘where its cultural significance is understood’ (BBC News 2012; House of Commons Welsh Affairs Committee 2007, 2015, 2019a; Ministry of Justice 2013a, para 7; Madoc-Jones 2007).

3 | The Promise of Language Parity in Welsh Prisons

The protection of the language within Wales’ five prisons is highly complex. One of UK devolution’s most striking anomalies is that Wales remains the only devolved country without its own distinct criminal justice system. Despite having its own government and legislature, it continues to be a part of the single jurisdiction of England and Wales. Unlike Scotland and Northern Ireland where devolved executives and legislatures align with separate legal jurisdictions and justice systems, it is precisely a lack of alignment that defines the situation in Wales (Jones and Wyn Jones 2022).

Under the Government of Wales Act 2006, responsibility for the Welsh language falls under the auspices of the Welsh Government and the Senedd. In 2011, they introduced the Welsh Language (Wales) Measure 2011 to further safeguard and promote the language. The Measure gives Welsh official status alongside English and empowers Welsh ministers to set rules which public and designated private bodies are obliged to follow at the direction and supervision of an independent regulator, the Office of the Welsh Language Commissioner (WLC). Prisons in Wales, however, remain the responsibility of UK ministers in London. HM Prison and Probation Service (HMPPS), the executive agency responsible for operating prisons in Wales, is therefore not subject to the 2011 Measure or the full jurisdiction of the WLC. Instead, it adheres to the terms of the UK Parliament’s Welsh Language Act 1993.

Under the 1993 Act, public bodies are required to publish policies (known as ‘Welsh language schemes’) outlining the steps which they will take with regard to Welsh language provision. The Act stipulates that these schemes should seek to give effect to a qualified principle of language parity: that ‘so far as is both appropriate in the circumstances and reasonably practicable, ... the English and Welsh languages should be treated on a basis of equality’. Crucially, the Act applies primarily to services provided *in Wales*; higher standards are therefore expected of Wales’ five prisons (House of Commons Welsh Affairs Committee 2019a; HMPPS 2020).

Despite its introduction in 1993, no Welsh language scheme for prisons emerged until 2013. While the Home Office adopted its first scheme in 2002, and the Ministry of Justice (MoJ) in 2010, these contained no detailed instructions for prisons as acknowledged in the first scheme for prisons adopted in 2013 (National Offender Management Service 2013). The 2013 scheme made numerous commitments, including ‘bilingual provision

and services whenever they are required to people whose preferred language is Welsh' and the removal of 'obstacles ... which inhibit the use of Welsh' (National Offender Management Service 2013, 6, 7).

These commitments were reaffirmed and extended under HMPPS' 2020–2023 (and most recent) Welsh language scheme, which sets out in detail the standards currently expected of Welsh prisons. This policy acknowledges a 'right to use Welsh' for both prisoners and staff (HMPPS 2020, 4): 'prisoners can communicate with each other and with external contacts in Welsh if they wish' (HMPPS 2020, 4). Further, it sets out numerous positive steps expected of Welsh prisons. For example, individuals should be asked their language ability and preferences upon their reception into prison, with data maintained on HMPPS information systems. Even more ambitiously, there should be a 'bilingual environment' (HMPPS 2020, 9), in which all signs and services are to be either provided or made available in both Welsh and English. Media and literature available in the library are to be kept under review to meet the prison's Welsh language needs. Welsh language classes should be available, and the formation of Welsh groups and the nomination of Welsh language ambassadors is to be encouraged.

Despite not being formally subject to the 2011 Measure, HMPPS' declared intention is the same: Within the Welsh prison estate, Welsh should be treated no less favourably than English, and individuals should be able to live their lives through the medium of Welsh if they choose. The limited evidence available, however, suggests that this promise of language parity remains largely unfulfilled. In a major report on the Welsh language within the prison estate, for example, the Welsh Language Commissioner (2018, 62) observed that Welsh-speakers had 'far better experiences in Wales compared to England' but also found evidence of failings across the prison estate as a whole. Following an inquiry into Welsh prisons, House of Commons Welsh Affairs Committee (2019a, 32) concluded that there were 'inadequacies and inconsistencies in Welsh-language provision' right across the Welsh prison estate.

While recent inspection reports have identified progress towards language parity in some Welsh prisons (e.g., IMB 2023; HMI Prisons 2023), there have been several instances in which key stipulations of the 2020 scheme have been breached. There is evidence, for example, that new arrivals across Wales are not asked consistently about their language preferences (HMI Prisons 2022a). Failures to erect bilingual signs and provide key information and forms in Welsh also continue to be documented (HMI Prisons 2022a; 2024, 2025). At some sites, formal opportunities for speakers and learners to develop their skills have been found lacking and the adherence of some Welsh prisons to their own Welsh language 'action plans' has been questioned following inspections (HMI Prisons 2021, 2024, 2025). Concerns have also been raised that some Welsh prisons are 'too positive' and 'overly complimentary' in their own assessments of their Welsh language provision (HMI Prisons 2021, 12, 43).

Wales' newest prison, HMP Berwyn, was supposed to be different.⁵ The posterchild of the UK Government's prison modernisation and reform agenda when it opened in 2017 (Jones et al. 2024), this 2100 place prison in north Wales was at the forefront

of the MoJ's supposed renewed focus on rehabilitation and purposeful activity (Cameron 2016). At the time, Berwyn was tipped by senior prison officials to become 'the flagship for the rest of the country [and] England to emulate' (O'Connor and O'Murchu 2019, para 11). Berwyn was also the culmination of a long-standing campaign for the construction of a prison in north Wales, seen widely as a 'local solution' to the problems facing those from the Welsh-speaking heartlands in north-west Wales sent to prisons in England (see Figure 1). This was the 'progressive' answer to the Welsh language question: a prison *for* Welsh-speakers that would 'embrace Welsh culture and language' (Prescott 2021, 46).⁶ According to the previous Welsh Secretary of State, it would even 'benefit prisoner welfare by allowing Welsh-speakers more opportunity to speak the language in an environment where its cultural significance is understood' (Ministry of Justice 2013a, para 7).

Significantly, Berwyn was the first Welsh prison to have been constructed in its entirety since Welsh language schemes were introduced in prisons. Alongside Ministry of Justice (2013b, para 8) claims that the prison would be 'especially' important for Welsh-speakers, the prison therefore embodied the 1993 Act's promise of language parity. This is the measure against which current practices at Berwyn are to be judged.

4 | Methodology

One of the major impediments to researching criminal justice in Wales is the paucity of disaggregated, Wales-only data within 'England and Wales' datasets (Commission on Justice in Wales 2019). Although the UK Government has pledged repeatedly to address this problem (e.g., House of Commons Welsh Affairs Committee 2019b; Ministry of Justice 2017), many data sources on Welsh prisons and prisoners remain publicly inaccessible, including information relating to both the total number of Welsh people in prison and the number of those who identify as Welsh-speaking. In 2019, the Commission on Justice in Wales (2019, 427), the first review of the operation of the criminal justice system in Wales in over 200 years, concluded that the lack of available Wales-only data had 'inevitably contributed' to a 'major deficiency in Wales specific research' on criminal justice.

We therefore adopted a mixed methods approach. First, original data were obtained using multiple requests for information under the Freedom of Information (FOI) Act 2000. FOI legislation provides researchers with the means to go beyond official discourses and explore under-researched topics and groups (Bows 2017; Savage and Hyde 2014, 303). Requests on the number of Welsh-speaking prisoners and prison staff in England and Wales were sent to the MoJ and helped to gain access to previously unseen or unpublished data. FOI requests were also vital in informing other stages of data collection. Data relating to the total number of Welsh-speaking prisoners held in each prison (see Table 1), for example, informed our semi-structured interview questions and requests were used to help corroborate the accounts given by former prisoners. The information gleaned from our use of FOI supported the triangulation of data and added depth and further originality to our research (Walby and Larsen 2011, 39).⁷

Second, we conducted eight in-depth semi-structured interviews with Welsh-speaking former prisoners who had previously been

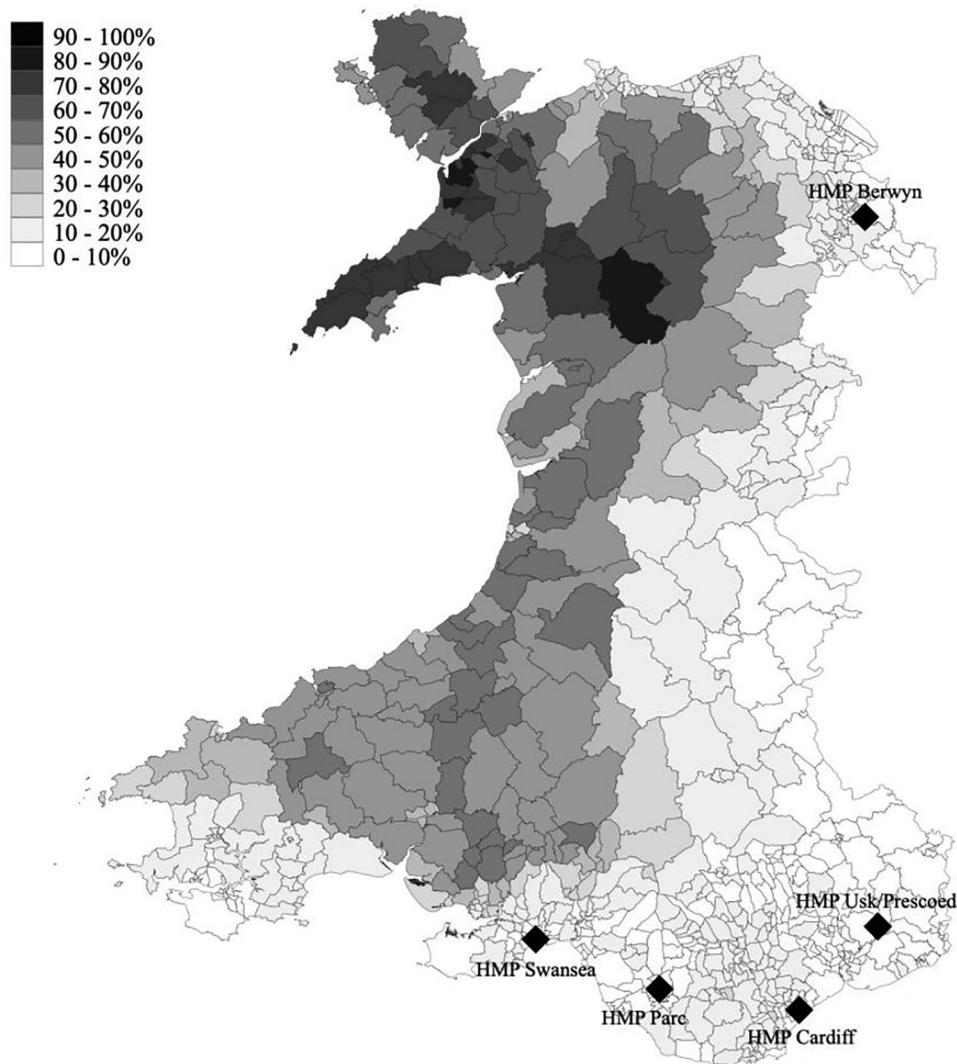


FIGURE 1 | Prisons in Wales overlaid on the proportion of Welsh-speakers in Wales by ward (Office for National Statistics 2022).

TABLE 1 | Welsh-speaking prisoners in Wales by establishment, 2018 to 2024 (Ministry of Justice 2025a).

	2018	2019	2020	2021	2022	2023	2024
Berwyn	14	40	65	74	82	88	84
Cardiff	16	15	17	12	11	16	18
Parc	31	28	31	35	33	38	46
Prescoed	3	1	3	6	9	6	6
Swansea	29	27	23	21	21	24	18
Usk ⁷	4	4	3	2	3	4	21
Total	97	115	142	150	159	176	193

held in Berwyn between 2018 and 2022. We decided to approach individuals who were no longer under post-release probation supervision in the community, and therefore outside the remit of HMPPS’ National Research Committee (NRC). The NRC was unreceptive to one of the researchers’ previous attempts to study this topic (Jones 2017),⁸ and stakeholder advice during a research scoping exercise underlined the growing reluctance of official gatekeepers to support research agendas on/about Wales amidst the ongoing political dispute over justice devolution. Interviewing

those in the community therefore helped us to avoid the many access challenges widely associated with prison research (Martel 2004; Stevens 2020; Watson and van der Meulen 2019), particularly when seeking to identify and access hard-to-reach minority populations.⁹

Locating and recruiting Welsh-speaking former prisoners in the community, however, presented its own challenges. Data on Welsh-speaking prisoners by establishment, and the input

received during our research scoping exercise, informed our decision to focus on Berwyn, where the largest number of Welsh-speaking prisoners are held (see Table 1). Multiple gatekeepers in north Wales were used to help identify and 'facilitate' access to eight participants who met the narrowly defined inclusion criteria (Kristensen and Ravn 2015, 725). Interviewing in the community meant that participants were spread across a wide geographic area, often in hard-to-reach rural areas, which added to the access challenges we faced. To maximise the number of participants included in the study, the research team based themselves in north Wales over a period of weeks to ensure that as many eligible participants were reached as possible. Although a sample of eight participants might be considered small in the context of studies looking at larger-sized population groups, our sample is sufficient given our interest in a subsection of a minority population. Further, the 'deep exploration' offered in this article speaks to the value of the case study in qualitative research and is a testament to the powerful voices of the few (Maruna and Matravets 2007, 437).

All interviewees were given the choice of conducting the interview in either Welsh or English. Providing this option ensured that interviewees could participate in the language they were most comfortable.¹⁰ The use of in-depth semi-structured interviews allowed us to gather detailed and authentic accounts from Welsh-speakers with lived experience at Berwyn. The adoption of an interview guide added a degree of consistency to our questioning and allowed comparability between interviews (Belina 2023). Once data collection was complete, interview findings were analysed thematically to provide 'an overall story' about Welsh-speaking prisoners' experiences (Nowell et al. 2017, 1–11).

Finally, our FOI data and interview findings were buttressed by a documentary analysis of existing qualitative evidence on the Welsh language across the entire Welsh prison estate. This included academic research, government documents, all HM Inspectorate of Prisons (HMI Prisons) and Independent Monitoring Board (IMB) reports on Welsh prisons since 2007, parliamentary committee reports (including all oral evidence and written evidence), the Senedd Record of Proceedings, Hansard and media stories. The data gathered helped to further corroborate some of our interview data and acted as the basis on which to widen our search for data through FOI. Combining these methods, we were able to generate detailed and original empirical insights with which to examine Welsh language rights at Wales' newest prison.

5 | HMP Berwyn: A Case Study

Official assessments of Berwyn's Welsh language provision have varied. The first IMB report was effusive in its praise, describing bilingualism as 'inherent' to the prison (IMB 2018, 9, 15). HMI Prisons (2019, 15), on the other hand, observed 'no effective strategy to promote the Welsh language' following its first visit, but later found that provisions were 'developing appropriately' (HMI Prisons 2022b, 49). Our interviews and survey of the wider evidence, however, conveyed a different picture: neither one of inherent bilingualism or even a work-in-progress. Instead, we found that the needs of Welsh-speakers have been neglected at

the prison and that the use of Welsh has been overtly policed by prison staff.

5.1 | Esgeuluso | Neglect

Several symptoms of neglect were identified during the course of this research: a lack of opportunities to speak Welsh with other prisoners and staff, inconsistent access to bilingual forms and information, delayed correspondence and inadequate educational provision. Taken together, there was no sense that Welsh-speaking prisoners were able to live their lives through the medium of Welsh at Berwyn.

Despite being held in a 'flagship' Welsh prison, opportunities to speak Welsh on a day-to-day basis are often few and far between. Official data from the Ministry of Justice (2025a) indicate that a very small fraction (4%) of Berwyn's prison population is Welsh-speaking. Given the low numbers, this means that individuals may encounter few or even no other Welsh-speakers during their sentence and therefore miss out on the 'practical and psychological support' made available by other Welsh-speaking prisoners (Martynowicz 2018, 11). This problem is compounded by the fact that, according to several interviewees, Berwyn has no policy of placing Welsh-speakers in cells or prison wings together. As remarked by Hefin: 'Six to seven months I was on that wing, and I was the only Welsh-speaker'.

A lack of Welsh-speaking staff at Berwyn also presents serious challenges. Even before it opened, HMPPS faced significant criticism over its approach to staffing at the prison. In 2016, the Welsh Language Commissioner (2018) found that the agency had breached its own Welsh language scheme after it omitted any mention of Welsh language ability on job advertisements for prison staff. The prison's Deputy Director later claimed that there were 25 Welsh-speaking staff and that prisoners had 'direct access' to them through the prison's intranet (Dann 2018, Q317). The Welsh Language Commissioner's 2018 report also noted that prisoners at Berwyn had encountered Welsh-speaking staff in 'the gym, the college and the health service' and even in certain senior roles (Welsh Language Commissioner 2018, 67).

Our interviewees, however, gave mixed accounts. Some suggested that there were 'a lot more staff who understood the Welsh language', compared to English prisons (Aled) and recounted some positive experiences. Others had encountered few Welsh-speaking staff. Carwyn recalled meeting 'one Welsh-speaking officer the whole time I was there for a year'. Another, Emyr, recalled 'maybe three, four Welsh-speaking screws' on his wing. Others said that 'none of them [staff] could speak Welsh' (Gwilym) and that 'there was no Welsh staff in there at all' (Hefin). New data obtained from the Ministry of Justice (2024) through FOI support these accounts: As of June 2024, there were just 13 declared Welsh-speaking officers at the prison, the equivalent of 2% of all operational staff.

This environment, where the majority of staff and prisoners are non-Welsh-speakers, often discouraged prisoners from using the language.¹¹

Because we know most of the staff would speak English, we'd speak English. But if it was just us lads in a little group, we'd chat in Welsh and that. (Aled)

Say there was a group somewhere, and there was only one Welsh-speaker among them, I wouldn't have gone automatically into Welsh then, because in a place like that ... you're going to get somebody's back up. So I would've stuck to English. (Francis)

The distinct pains facing minority prisoners often include experiencing amplified feelings of anxiety and isolation (Atabay 2009; Earle and Phillips 2013; Grant 2016). While studies have previously identified that Welsh-speaking prisoners feel a heightened sense of isolation when held in England (Hughes and Madoc-Jones 2005), Hefin described how the environment in Berwyn—a Welsh prison—contributed to his own feelings of isolation:

You need someone Welsh to speak to if you're Welsh. ... You feel more at home, basically. That's all it was in my eyes, that I felt awkward and left out... (Hefin)

A related problem for prisoners was that, even if staff could speak Welsh, identifying Welsh-speakers was often difficult. Although HMPPS' 2020–2023 strategy to deliver language parity states that both staff and prisoners should be offered lanyards or badges to clearly communicate their Welsh language ability, HMI Prison's 2022 inspection found that '[s]taff and peer workers did not routinely wear badges to identify Welsh speakers' (HMI Prisons 2022b, 19). This problem was also raised by Francis:

[W]hat surprised me was, if there were any Welsh-speaking officers, I don't remember anybody—you see it with teachers, the police, the NHS, they'll have a lanyard or something which says, 'Siaradwr Cymraeg'. I didn't see any of that. ... [B]eing a Welsh-speaker, the type of person I am, if I saw someone with, you know, 'Siaradwr Cymraeg', chances are I would have spoken Welsh with them. (Francis)

In its most recent inspection, published since our interview data were collected, HMI Prisons (2025, 30) again found that prisoners at Berwyn 'could not easily identify staff who could speak Welsh'.

Prison reports and interviewee accounts suggest that various other aspects of the 2013 and 2020 Welsh Language Schemes have not been observed at Berwyn. For instance, while prisons are expected to establish new arrivals' language preferences at reception, several interviewees claimed that this never took place. This account is corroborated by HMI Prison's 2022 inspection (2022b, 19), which found that prisoners were not 'routinely' asked about their language preferences at reception. Even in those instances where prisoners were asked, interviewees suggested that this often made no difference to the services offered: 'Like, they say, "Right, you're Welsh," and that was it. They wrote it down and that was it' (Ieuan).

Our interviewees also cast doubt over the extent to which prison officials at Berwyn issue forms, information and correspondence in Welsh. Gwilym, for example, remarked that 'everything [at the prison] was in English', while Francis said that information on the intranet was only available in English and that only some things were provided bilingually, such as forms and communications from the governor. Problems have also arisen in relation to correspondence with those outside of the prison. HMI Prison's (2019) first inspection noted delays in the translation of Welsh telephone calls at Berwyn, which it flagged as a potential security and public safety concern. These issues have been documented previously in English prisons (e.g., Welsh Language Board 2007), but not in relation to prisons in Wales. Even accounting for problems elsewhere in the Welsh prison estate, Berwyn appears to be an outlier. Additionally, several interviewees had experienced significant delays when correspondence was written in Welsh, whether sent via letter or email:

[M]y pad mate, he sent a letter [in English], and it arrived within two, three days. My letter [in Welsh] takes two weeks, three weeks, and if not, [it will] go missing. ... It was pathetic. I stopped writing letters in the end just because of the fact of they never received some of them. (Hefin)

Yeah, this was to my solicitor. I wrote to him in English. And I got a reply back off him straight away. I wrote to [my probation officer, in Welsh], and it took a week. And I was like... thinking, 'Why is it taking so long?' I thought he was being funny with me; do you know what I mean? (Ieuan)

[W]hen I send an email it's yellow, once it's gone green, it means it's sent. So I remember writing emails in Welsh, it would still be there six days later. (Gwilym)

Although HMPPS' Welsh Language Scheme contains a commitment to offer Welsh language classes, interviewees raised further concerns over Berwyn's Welsh language educational and library provision. Two interviewees claimed that there was no Welsh language education at all at Berwyn. Others acknowledged that there was some, albeit limited, provision for Welsh-speaking prisoners. According to Carwyn, 'You can go to Welsh speaking lessons and education and stuff, but it's not like there's lots of it or anything'. This corresponds to the Welsh Language Commissioner's (2018, 63) previous observation that 'fluent Welsh speakers' at Berwyn were attending classes targeted at Welsh learners. In response to an FOI request, the prison education provider confirmed that just one Welsh language course, aimed at learners, is offered at Berwyn (LTE Group 2024). For fluent Welsh-speaking prisoners, this was a source of considerable frustration. Francis, for instance, said it was 'pointless' to him as a first-language speaker.

... the only course I saw with Welsh was somebody wanting to begin learning Welsh. Which [was] pointless for me, really. But apart from that, I don't remember being offered a course in Welsh. (Francis)

The absence of any advanced educational provision in Welsh means that English language programmes dominate the curriculum. This issue was raised following HMI Prison's (2025) most recent inspection, which concluded that 'there was not enough emphasis on promoting the use of Welsh and supporting Welsh first-language speakers' within educational provision. For prisoners educated and raised through the medium of Welsh, often with limited experience of learning in English, this is a significant impediment. As Ieuan explained:

I can speak better in Welsh, like express myself better and things like that. Sometimes when I speak English, I stutter... because it's not my first language. I went to a Welsh [medium] school. We were taught in primary school to speak it [English] a bit, but we only had one lesson in English. ... I'm from a little village in rural north west Wales. It's only Welsh we speak. It was only really when I left [the village] and I got put into care at 11 that I started speaking English, you know?

When asked to attend an English course as part of the prison's general education programme, Ieuan refused, resulting in an official reprimand and the temporary removal of his 'privileges' under the Incentives and Earned Privileges (IEP) scheme.

'You should be asking the English lads', I said, 'to go on a Welsh course, not asking me to go on a fucking English course'. Do you know what I mean? I said, 'I'm not doing it'. I said, 'I'm not leaving my pad'. And she wrote back and said, 'If you don't come to education and do English', she said, 'then obviously, you'll get a nicking'. And I lost privileges for twenty-eight days. (Ieuan)

Ieuan's account underlines the failure to deliver parity between the Welsh and English languages in educational provision at Berwyn. It also provides a clear sense of the frustration and unfairness felt by prisoners confronted with the absence of meaningful language rights. In place of parity, it seems, individuals like Ieuan face the pains of social exclusion typical for other minority language prisoners (Brouwer 2020; Croux et al. 2023; Ugelvik and Damsa 2018). The fact that such pains are inflicted in a *Welsh* prison, however, only deepens them.

5.2 | Ymyraethau | Interferences

While interferences with the use of Welsh by prison staff have been documented previously in England (Inside Time 2021; Jones 2017), historically there has been less evidence of such treatment within Welsh prisons. Despite this, the policing of Welsh by staff at Berwyn emerged as a consistent theme throughout our interviews and documentary analysis. Once again, the pains experienced by other linguistic minorities in prison—suspicion, hostility and feelings of exclusion—were also evident here.

In 2020, Berwyn's IMB observed that multiple prisoners had submitted Discrimination Incident Reporting Forms alleging threats

to their IEP status for communicating in Welsh (IMB 2020). The issue attracted significant political and media attention, with the Welsh Government's (2021) Welsh Language Minister writing to the UK Government to demand an explanation. While the Ministry of Justice (2021) denied the allegations, HMPPS' 2020 Welsh language scheme placed considerably greater emphasis on prisoners' freedom to communicate in Welsh without interference.

Allegations have continued to surface, however. In January 2021, a prisoner at Berwyn, Rhodri ab Eilian, claimed that Welsh-speakers were subject to suspicion, frequent threats to their IEP status, segregation and even physical violence. ab Eilian revealed to a local media outlet that he had been physically assaulted after making public criticisms of Berwyn's treatment of Welsh-speakers (Mills 2021).

During the interviews, we were given a variety of examples of staff interfering with the use of Welsh by prisoners. Several individuals described being confronted by prison officers when speaking Welsh with fellow prisoners on prison landings and association spaces. In some instances, they had been asked to convey what had been said. On other occasions, prisoners were instructed by staff to switch to English. According to Gwilym, such interventions occurred on a 'daily basis'.

Some also described outright hostility toward the language from staff. Emyr, for example, said that the officers 'hated it'. Ieuan, similarly, recalled frequent hostility from staff on the prison landings:

[L]ike, you've got all the lads from Caernarfon and Bangor. So they all meet and they all start speaking Welsh. And you've got the lead officer telling them not to, do you know what I mean? They [staff] obviously swear at them and everything, you know? 'Either fuck off onto the yard or get back onto your wing', and all this... 'Standing there and fucking speaking that fucking language', and that. What do you mean, 'That fucking language?' That's our language. (Ieuan)

As Ieuan's reference to 'our language' makes clear, such interactions represented an acute lack of respect from staff towards the individual and cultural identities of Welsh-speakers at Berwyn, exacerbating their sense of exclusion and alienation. There were also more extreme examples. Emyr described losing his job while working at the prison after speaking Welsh to a customer on the telephone:

One of the jobs was telemarketing. So you've got your computer in front of you and a phone, and it would just automatically dial numbers, and then you would give these questionnaires. ... And one day, the phone—just a random number. This lady answers... you could tell from the off, massive Welsh accent. So I started speaking Welsh to her. I explained everything in Welsh and got the questionnaire done and everything, but two minutes later, the officers come with the woman that's

running the place and told me never to do that again, to speak Welsh. And when I sort of confronted her, I got sacked. (Emyr)

When you confronted her about it, what did you say to her? (Interviewer)

‘Well, I’m in Wales. I’m using my language.’ You know? (Emyr)

This was not the only example of overreach by prison staff. One interviewee, Ieuan, recounted how he had been told not to speak Welsh with his solicitor during a supposedly private and confidential meeting:

I was on video link with my solicitor and I was speaking Welsh with him, and the officer come in and told me to stop speaking Welsh, or else I’d get done for it. I’d get a nicking for it. And I was like, ‘What do you mean? What? I am Welsh’, I said, ‘and he’s Welsh’. And it was nothing to do with them anyway. I was on video link with my solicitor, in a room—it should have been private. And, yeah, he walked in and told me to stop speaking Welsh. And I was like shocked and even my solicitor was. ... So obviously we had to speak English then. (Ieuan)

Despite being encouraged by his solicitor to continue speaking Welsh, Ieuan was inhibited by the potential consequences. Although he raised the issue with other prison officers, they were unreceptive, despite his insistence that ‘it’s a Welsh right to speak my language’. Other interviewees also expressed their concern about the consequences of speaking Welsh at Berwyn. If not asked to translate or switch to English, or if they continued to speak Welsh, they suggested that a Welsh-speaking officer would arrive and stand within earshot. Several interviewees also indicated that they had been threatened personally with reduced IEP status, with direct consequences for their income, food provision, visits, gym access and other amenities:

...the officers in Berwyn, they actually threatened to give you a nicking unless you change, unless you speak what they can understand. (Gwilym)

They would just ask, you know, ‘I can’t understand what you’re saying. You have to speak English to me’. And then if you carry on with it, right, if you don’t stop, they put you in the box, which means, you know, you lose your status as an enhanced prisoner. (Emyr)

In this context, some prisoners circumscribed their use of Welsh under a clear sense of duress. Put simply, they did not want to risk incurring punishments or making their situation more difficult. Aled, for example, described how he and other Welsh-speakers would always speak English around staff to assure them that ‘we weren’t trying to cause mischief’. Here, several interviewees

referred to a tacit threat of sanctions, which is ever-present in the prison setting:

I wouldn’t risk it [protesting] because I didn’t want my enhanced [status] taken off me. (Gwilym)

You don’t kick up a fuss in jail, because you’ve got no rights, you know? The harder you make an officer’s work, the more your life is going to suffer. (Emyr)

These insights vividly demonstrate the potential of the IEP regime to inflict additional pains upon prisoners (Crewe 2011), specifically by inhibiting their language use and self-expression. In this way, the interviewees also lent support to the view that the IEP regime has been used to subordinate prisoners’ rights to the status of revocable privileges (Hutton 2017), with the exercise of language rights in Berwyn seemingly conditioned by the threat of IEP sanctions.

During the interviews, the pattern of interferences was attributed to a lack of Welsh-speaking staff, as well as the wider culture within the prison, in which even Welsh-speaking officers ‘talked back in English to you, and they’d tell you to stop speaking Welsh’ (Ieuan). Previous research shows that the ‘pains’ experienced by minority group prisoners often include feelings that they are treated with greater suspicion and distrust by staff (Genders and Player 1989; HMI Prison 2010). Similarly, interviewees identified a climate of suspicion around the language at Berwyn centred on order and security considerations, particularly among the staff who could not speak Welsh.

They’d just be like, ‘I don’t know what you’re saying, or you could be up to something’. Or... just stuff like that. (Carwyn)

They’re saying, ‘You could be talking about us, ... or you could be planning something in that language’. (Ieuan)

While officers discouraging Welsh on security grounds has been documented previously in English prisons (House of Commons Welsh Affairs Committee 2007), it was suggested that this atmosphere of suspicion was particularly severe at Berwyn. Since opening in 2017, the prison has been widely criticised for high levels of violence and assault, including attacks on prison staff (Jones 2020). According to some interviewees, it was a ‘volatile environment’ and a ‘free-for-all’, where officers were likely to be ‘intimidated’ by ‘seeing people speaking Welsh’ together (Carwyn). Several interviewees even remarked that they had experienced greater tolerance of the language in English prisons. Conditions at HMP Altcourse in Liverpool, once widely regarded as north Wales’ local prison, for example, were described as ‘much more relaxed’, with officers generally unphased by prisoners having ‘a moider in Welsh’ (Ieuan).

Prisoners’ experiences of Berwyn also carried a deeper emotional and personal significance. There was an acute, shared awareness among those that we spoke to that Berwyn was built to be a *Welsh* prison: a more supportive and understanding environment for people from north Wales, particularly Welsh-speakers. In

Gwilym's words, it was supposed to be 'our jail'. The suspicion, neglect and mistreatment that several interviewees experienced had dashed these hopes, leading some to characterise Berwyn as an *English* prison that had failed comprehensively in its stated purpose.

It was the lack of that Welshness, if you like. It was very English. (Francis)

To me, it's an English jail. That's how I feel about it. It was an English jail. (Hefin)

It's sold as a Welsh prison for Welsh [people], you know? A local prison stopping us going into Liverpool and things. It's no different. (Emyr)

Berwyn is meant to be a Welsh-speaking jail. And it's far from that. It's one hundred percent not a Welsh-speaking jail. (Ieuan)

For Welsh-speaking prisoners sold the promise of a more supportive environment, this was clearly a distinct pain of imprisonment in itself. Their dismissal of Berwyn as an 'English prison' stands as a damning indictment of the protections conferred by the 1993 Act.

6 | Discussion and Conclusion

The experiences of the small sample of Welsh-speaking prisoners documented in this article cast serious doubt on claims about the 'inherent' bilingualism of Wales' 'flagship' prison. What is more, they suggest that the Welsh language protections available to prisoners have often been *illusory* in practice. Despite their supposedly privileged legal position under the 1993 Act (Hunter et al. 2022), Welsh-speaking prisoners at Berwyn have experienced 'distinct and separate' pains similar to those endured by minority language-speakers elsewhere (Brouwer 2020; Croux et al. 2023, 253; Diaz-Cotto 2006; Sykes 1958; Ugelvik and Damsa 2018): the loss of linguistic autonomy, feelings of exclusion and alienation and the emotional and psychological challenges of navigating a criminal justice system unsympathetic or even hostile to their language. Their description of Berwyn as an 'English' prison powerfully captures their feelings of being outsiders, even in a Welsh prison.

To some extent, these pains were linked to immediate environmental and institutional factors at Berwyn, such as the placement of Welsh-speaking prisoners, the proportion of Welsh-speaking staff and the attitudes of staff towards the language. However, they were also systemically rooted. The experiences of interferences, in particular, flowed in part from the coercive, 'psychological power' of the IEP regime and its potential to inflict additional pains and deprivations in the name of order and discipline (Crewe 2011, 456; Hutton 2017). More fundamentally, the findings underline the primacy of order and security as the governing logic of the prison system. In the context of wider operational failures at Berwyn, it appears that Welsh has often been regarded either as a potential security concern or an administrative inconvenience.

More broadly, our research contributes to wider critical research agendas by capturing the distinct pains deriving from legal rights and reforms that have failed to deliver real improvements to prisoners' lives. Armstrong (2020, 85) argues cogently that rights are not always tools of salvation; they are also mechanisms of control that can inflict 'material and psychic burdens' on prisoners, 'creating both hope and the basis of destroying it'. In an environment where hope is often integral to survival (Laursen 2023), the constant pledge of prison reform is therefore not something which simply goes unnoticed.

Echoing Armstrong (2018), Annison and Condry (2022, 1266) have discussed the 'pains of hope', or 'the pains of penal politics as experienced ... "from below"'. 'Hope...', they note, 'is both central to the possibility of change, but also acutely painful' (Annison and Condry 2022, 1266). Repeated government pledges that promise or even hint that a prisoner's situation will improve thus have the effect of raising the expectations of those affected, while a 'lack of alignment between supportive talk and substantive action' in turn corrodes that hope (Annison and Condry 2022, 1253, 1258). Wherever pledged improvements fail to materialise or the prison fails against its own explicitly stated purposes (Mathiesen 1990), pains of hope are likely to follow, exacerbating prisoners' feelings of loss, mistrust and alienation (Sykes 1958). In contexts where the discourse of 'prison modernisation' is deeply embedded (Jones et al. 2024), the pains of hope are likely to be as widespread as they are diverse. The experiences of Welsh-speakers at HMP Berwyn testify powerfully to the 'cruel optimism' engendered by this process (Kemp and Tomczak 2024, 1706).

The analysis presented here also has several important implications for ongoing and future debates. Recent prison population figures point to a concerted effort by HMPPS to keep more Welsh prisoners in Wales. In 2024, 70% of Welsh prisoners were held in Wales, compared to just 54% in 2013 (Ministry of Justice 2025b). To the extent that this enables individuals to remain closer to their homes and families, it is a welcome shift in prisoner placement policy. In light of this study, however, it cannot be assumed that this trend necessarily represents progress for Welsh-speakers. As the case study of Berwyn makes all too clear, Welsh-speakers can experience neglect and interferences on both sides of the border. For the same reason, any future attempt to justify further expansion of the Welsh prison estate on Welsh language grounds warrants the utmost scepticism.

Finally, the glaring weaknesses of prisoners' Welsh language rights also demand fresh consideration of the anomalous constitutional arrangements governing prisons in Wales. The only common law country in the world to have its own legislature and executive without its own justice system (Welsh Government 2018), our findings further illustrate the difficulties of enhancing devolved rights in areas that remain reserved to the UK Parliament (Davies and Jones 2023). This reinforces, once more, the need to take seriously the UK's multi-national, post-devolution landscape and thereby challenge dominant characterisations of 'UK' or 'British' criminology, which have long overlooked Wales's distinct problems and arrangements (Jones and Wyn Jones 2022). Without this, criminological debates are more likely to distort than clarify the realities of law and justice within the United Kingdom.

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Endnotes

- ¹Welsh-speakers in Wales constitute 'the largest historically situated, territorially bound, linguistic minority group' in the United Kingdom (Madoc-Jones and Buchanan 2004, 354). It is estimated that around 17% (538,000) of people currently living in Wales are Welsh-speakers (Office for National Statistics 2022).
- ²Laws in Wales Acts 1536–1542.
- ³In 1847, three non-Welsh speaking commissioners published the Report of the Commissioners of Inquiry into the State of Education in Wales. The report described the Welsh language as a 'manifold barrier to ... moral progress' and warned that its 'evil effects' should not be underestimated (1847, 66). Despite the widespread upset the Report caused, it reinforced the idea throughout the 19th and 20th centuries that the Welsh language was irrelevant, inferior and subordinate to English (Roberts 1998; Johns 2024).
- ⁴The Identity and Language (Northern Ireland) Act 2022 is testament to the legislation's continuing influence.
- ⁵HMP Berwyn is an adult male category C training prison.
- ⁶Although one of the prison's six stated core values when it opened in 2017 was to 'embrace Welsh culture and language' (Prescott 2021, 46), few specific details were ever provided to explain what this vision would mean in practice, or how it would be achieved.
- ⁷There was a 425% increase in the number of Welsh-speaking prisoners at HMP Usk in 2024. According to HMPPS, this sharp rise is due to an 'improvement to local recording practices' at the prison.
- ⁸An official application to research this topic was previously turned down by the NRC. Although the 'official' reason given was that the project was hampered by 'methodological' issues, justice officials later informally disclosed that the study was rejected due to fears that it was 'nationalist' in nature.
- ⁹The project received approval from both of the researchers' University Research Ethics Committees in 2023.
- ¹⁰A handful of participants opted to take part in the interviews in Welsh, and others opted for English. In many cases, however, both languages were used during different stages of the interviews.
- ¹¹For a more detailed analysis and discussion of the circumstances surrounding language choice among Welsh-speakers in the criminal justice system, see Madoc-Jones and Parry (2013).

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Greyhound Rescue Wales Evidence to the Culture, Communications, Welsh Language, Sport, and International Relations Committee on The Prohibition of Greyhound Racing (Wales) Bill

1. Summary

- I. Greyhound racing in Wales should cease no later than 1 April 2027, due to the inherent risk of injury to dogs and the short career duration of racing greyhounds at the Valley track.**
- II. Approximately 300 greyhounds are needed sustain the Valley track's current level of racing activity (10,000 gambling opportunities (runs) per year).**
- III. The Valley track discards approximately 120 young greyhounds per year: 1 dog every 3 days. The average age of greyhounds at the time of their last race or trial is just 3 years and 4 months.**
- IV. Median career length of greyhounds at the Valley is just 15 months: this means 150 new dogs are brought to the Valley track in every 15-month period to replenish dogs that are no longer fit to race.**
- V. Therefore, with every month that the ban is delayed, 10 more dogs are subjected to the inherent risk of racing around the Valley track**
- VI. Given the rate of injuries, short racing careers and annual turnover of Valley-attached dogs, an implementation date of 2030 could result in an additional 480 greyhounds, many of which will have suffered significant injuries, needing to be rehomed by animal rescue charities, over and above the approximately 200-250 dogs which will need to be rehomed immediately following a ban.**
- VII. In the first year of GBGB racing, 601 individual dogs ran at the Valley track (in 9610 runs). Of these, 322 dogs were trained by [REDACTED] [REDACTED] Data shows these 322 Valley-attached dogs accrued 85% of individual runs**

- VIII. During this first year 267 adverse events and injuries were identified from GBGB and the Valley track's own published material. Outcomes after these adverse events were categorised according to their calculated stand-down time (period of incapacitation): 127 categorised as Transient (stand-down time from racing 21 days or less); 105 Serious (stand-down time 22 days or more); and 35 Career-ending (never raced again).
- IX. For all 601 dogs the annual incidence of adverse events (such as falls, documented lameness etc) was 44.4%, rising to 73.9% for Valley-attached dogs.
- X. A further 66 Valley-attached dogs were identified that appear to have stopped racing before 31st October 2024, for reasons unknown.
- XI. Analysis of GBGB published disciplinary records clearly demonstrates industry self-regulation has failed to eliminate widespread doping and misuse of human and veterinary medicines, as well as systemic welfare failures within trainee's kennels, including cases of serious neglect and abuse, failure to provide veterinary treatment, greyhounds being starved, etc.
- XII. GBGB's Responsible Rehoming Policy has not been complied with by [REDACTED] [REDACTED] Inappropriate and reckless "rehoming practices" have resulted in cases of seriously neglected and injured dogs being found stray.
- XIII. Photos published [REDACTED] clearly shows dogs were seriously neglected and underweight whilst kennelled at the track. These dogs belonged to the track owner's family.
- XIV. GBGB issued a licence [REDACTED] they had previously banned for life for doping and race fixing, specifically so that they could help train dogs to race at the Valley track.

2. The Prohibition of Greyhound Racing (Wales) Bill

- I. Greyhound Rescue Wales (GRW) along with our *Cut The Chase Coalition* partners – Dogs Trust, Blue Cross, RSPCA and Hope Rescue - are enormously encouraged by the Welsh Government's commitment to ban greyhound racing in Wales. This policy is in line with current developments in New Zealand where a 20 month phase out period will see greyhound racing banned as of 1st August 2026 and Tasmania where in August 2025 the State government also announced a withdrawal of public subsidies and a phased end to greyhound racing.
- II. With the introduction of the Prohibition of Greyhound Racing (Wales) Bill, Senedd now stands on the brink of a historic decision to end this outdated and unsustainable practice in Wales once and for all. Indeed, a vote in favour of the

Bill is the only way in which the welfare of greyhounds in Wales can be meaningfully protected, and the serious ongoing risk of injury and death of greyhounds at Wales last remaining greyhound track removed.

*

- III. The Explanatory Memorandum accompanying the Bill clearly shows that: both the WG and Senedd itself have consulted extensively on this issue; greyhound racing no longer has a social licence to operate in Wales; and, the social costs of introducing a ban are minimal, particularly in comparison to future injuries, deaths, and loss of welfare to very significant numbers of dogs if racing was to continue.
- IV. GRW believes the draft Bill is proportionate, well drafted and will achieve its objective. However, we support limited minor amendments to address the following concerns.
- V. Implementation Period: GRW believes that an implementation period of up to 4 years from the passage of the legislation is significantly too long. Indeed, it is far longer than the career of a racing greyhound, so will do nothing to protect the welfare of those dogs currently racing at the Valley track. Indeed, an implementation date as late as 2030 will result in:
 - a. No incentive for the owners of the Valley Stadium, or the trainers attached to the track, to promptly scale back racing activities.
 - b. Many hundreds of additional injuries and a significant number of further greyhound deaths at the Valley track.
 - c. Approximately 120 additional new dogs each year being brought in to race at the Valley track to replace those unfit and injured dogs no longer able to continue racing.ⁱ
 - d. Approximately 120 additional dogs would need each year that racing is allowed to continue.
- VI. The rescue charities, including GRW, represented in the **Welsh Greyhound Partnership** are confident that they can jointly provide medical care and provide rescue spaces for 200-250 greyhoundsⁱⁱ that may leave the industry as a result of the cessation of racing at the Valley track, as a one-off operation (see below). However, the rescue sector is currently in crisis not just in Wales but across the UK. A four-year delay in implementation could easily add another 480 dogs to the total number of greyhounds needing to be rehomed, many of which will have suffered significant injuries. GBGB does not contribute to the, often substantial, ongoing veterinary care costs of these dogs.
- VII. **This costs of lifelong support for dogs rehomed with old racing injuries is a significant financial burden for animal rescues and ultimately to members of the Welsh public who adopt and care for greyhounds that sustained serious racing injuries. These ongoing costs continue until the end of the greyhounds' natural lives. In many cases these costs significantly exceed the run money "earnt" by the trainers/owners of these dogs during their racing career.**
- VIII. Essentially, every injured greyhound that receives treatment under the GBGB's Injury Recovery Scheme and is then surrendered to rescue, will have to be

rehomed to adopters with a pre-existing musculoskeletal condition that will be excluded from any standard pet insurance policy taken out by adopters. Longterm veterinary cost to manage osteoarthritis, chronic pain, mobility impairment or late implant-related complications after fracture repairs can be substantial. Based on VetCompass data on greyhounds under veterinary care in 2016, the median longevity for greyhounds was 11.4 years. 'Musculoskeletal disorder' was found to be the third most common cause of death (euthanasia), in 7.8% of greyhounds (after neoplasia, 21.5% and collapse, 14.3%).ⁱⁱⁱ

- IX. **GRW therefore believes that greyhound racing should be banned at the earliest practical opportunity, and no later than 1 April 2027.**
- X. Trainers and Owners: GRW believes that it should unambiguously be an offence for both the trainer and the owner of a greyhound to allow it to take part in racing activities in Wales.
- XI. **It is our view that Section 1(1)(b) of the draft Bill should be amended to specifically include the TRAINER and OWNER(S) of any greyhound participating in illegal racing in the category of individuals who would be guilty of the offence of “organising greyhound racing in Wales”.**

3. Welfare and Rehoming of Dogs Following a Ban: The Welsh Greyhound Partnership

- I. The Welsh Greyhound Partnership (WGP) is a collective of nine organisations committed to protecting the welfare of each and every greyhound that leaves the racing industry as a result of a ban on greyhound racing in Wales. It held its inaugural meeting on 24th February 2025. Member organisations are: Almost Home Dog Rescue, Battersea Dogs and Cats Home, Blue Cross, Dogs Trust, Forever Hounds Trust, Greyhound Rescue Wales, Greyhound Trust South West Wales, Hope Rescue and the RSPCA. Member organisations have committed as a collective to the following objectives:
 - a. Ensuring that there is a rescue space for every single greyhound leaving racing in Wales as a result of the implementation of a ban.
 - b. Providing a central point of contact for owners and trainers wanting to relinquish their dogs.
 - c. Ensuring that all dogs are provided with veterinary and behavioural support in accordance with their individual needs while in the care of rescue organisations and in preparation for rehoming, regardless of which organisation they are helped by.
 - d. Coordinating the allocation of dogs to each of our organisations, to make the best use of our collective resources.
- II. WGP members estimate they will jointly be able to find homes for between 200 and 250 greyhounds in the two months following the implementation of a ban. This would be as a result of a time-limited concerted effort. Between 1 March 2025 and 31 September 2025 WGP member organisations took 75 greyhounds into their care which had trialled or raced at the Valley track.

- III. However, following Welsh Government's announcement of the timeframe for the implementation of the ban (between April 2027 – April 2030) the Partnership is now temporarily suspended its operations. This is because prioritising Welsh based greyhounds would not be sustainable over a long period of time and would in fact facilitate the renewal of the racing stock at the remaining Welsh track. Operations will resume ahead of the date for the ban, once this is finalised.

4. The Failure of GBGB Regulation to Protect Greyhounds

- I. The Greyhound Board of Great Britain (GBGB) frequently claims that its regulation, particularly its rules of racing and welfare strategy, protects greyhounds. At the same time GBGB refuses to disclose track level injury and death data, or allow meaningful independent scrutiny of the welfare outcomes for greyhounds exploited by the industry. Moreover, the limited annual aggregate injury and death statistics it does publish are deliberately opaque and at times actively misleading.
- II. GBGB's injury data relates only to numbers of race-day injuries, that is the number of injuries picked up by their vets immediately a dog completes its race. However, as the WHK and Hanson Reports in New Zealand made clear, this approach significantly underestimates the true number of injuries as many, particularly muscular injuries, only become apparent after the dog has cooled down and left the track. Indeed, in 2018 Greyhound Racing New Zealand (GRNZ) introduced a rule requiring licensed persons to report injuries outside of race days. This has proved difficult to enforce as a result of non-compliance by trainers within the industry.^{iv}
- III. GBGB does not publish any veterinary diagnoses or even rough breakdown of types of injuries suffered by greyhounds at its tracks, or breakdown of injury severity (categorised by stand-down times). This is in sharp contrast to the situation in Australia and New Zealand where Stewards Reports for each race meeting provide details of individual injuries.
- IV. In its most recent data for 2024 GBGB states that its "*track fatality rate continues to be 0.03%*".^v This claim has been repeated in the Senedd. However, it is misleading as it does not relate to the percentage of dogs which die each year: With the Valley track providing 10'000 runs per year, this statistic equates to 3 dogs estimated to die annually, directly as a result of racing activities in Wales, or 12 dogs in next 4 years if implementation of the ban was delayed until 2030. Those racing-related deaths are entirely preventable with prompt implementation of the ban in April 2027.
- V. Elsewhere GBGB published statistics actually state 2.1% of its "registered racing greyhound population" were "*Put to Sleep on Humane Grounds at Track*" and that 6.7% died in 2024.^{vi} However, it should be noted that GBGB does not actually disclose the number of dogs in its "total registered racing greyhound population" each year, or make clear whether all of these dogs actively race in any given year. Based on our calculation of a population of 300 racing

greyhounds at the Valley track, applications of this statistic would translate to 6 greyhounds that may be put to sleep on humane grounds in Wales, annually.

- VI. GBGB do state that the mean number of dogs put to sleep per track in 2024 was 6. However, they concede that for some tracks this number is certainly higher and that one track was placed in special measures in 2024 as a result of its “abnormal fatality rate”. We do not know if this was the Valley as the identity of this track has not been disclosed.
- VII. Moreover, analysis of 10 years of published GBGB disciplinary records, undertaken by GRW^{vii}, clearly demonstrates a persistent and ongoing failure to stamp out:
 - a. Deliberate doping and the illegal importation and misuse of human medicines (only approximately 2% of runners at tested trackside)
 - b. Failures to seek veterinary assistance or follow veterinary advice for injured dogs
 - c. Significant welfare issues in trainer’s kennels (including cases of serious neglect, greyhounds being starved, etc)
 - d. Inappropriate and reckless “rehoming practices” including advertising dogs for sale online for as little as £50, supposedly selling dogs directly to members of public, and falsifying adoption records (GBGB Green Forms) which led to cases of often sick and injured dogs being found stray.

5. Welfare failures [REDACTED] under GBGB

- I. GBGB issued a [REDACTED] who they had previously banned for life for doping and race fixing, specifically so that they could help train dogs to race at the track.^{viii}
- II. An investigation by GRW uncovered [REDACTED] dogs being “rehomed” direct from the track with no home checks, and which were underweight, had open wounds and ticks, and had not been neutered.^{ix} GBGB has failed to respond to, or even acknowledge, a formal complaint over these breaches of its responsible rehoming policy.
- III. Other dogs from [REDACTED] have turned up stray, seriously underweight and in the case of [REDACTED] with serious untreated injuries (see figure 1 below).^x
- IV. Photos posted online [REDACTED] show that two dogs [REDACTED] and [REDACTED] were seriously under-weight and neglected whilst housed at the Valley’s kennels (see figure 2 below).
- V. These dogs [REDACTED] It has been alleged that their licence was revoked by GBGB. However, no disciplinary case relating to this individual has yet been published.
- VI. In August 2025 the Valley Stadium was cautioned by GBGB for the “*temporary housing of excess greyhounds from XXXX XXXXXX’s kennel in the racecourse*”

kennels^{xi} In addition to the residential kennels on site, Valley also has a separate section of racing kennels solely designed to hold dogs for a few hours during race meetings. These are in effect small cages. GBGB Rule 109 specifies these must be at a minimum 136cm long, 87cm wide and 110cm high internally, which equate to 1.18m² floor area. These “kennels” are utterly unsuited for housing any dog, and fall well below the required minimal standards for boarding kennels (sleeping area of minimal 1.9m² floor area, height of 1.8m and constant access to an exercise run during daytime, or dogs to be removed from kennel unit at least 4 times per day for exercise and toileting.^{xii} No fine was issued by GBGB. GRW believes this incident was also a breach of the Valley Stadium’s planning consent.

Figure 1: Photos showing [REDACTED] after being found as a stray in West Wales (February 2025)

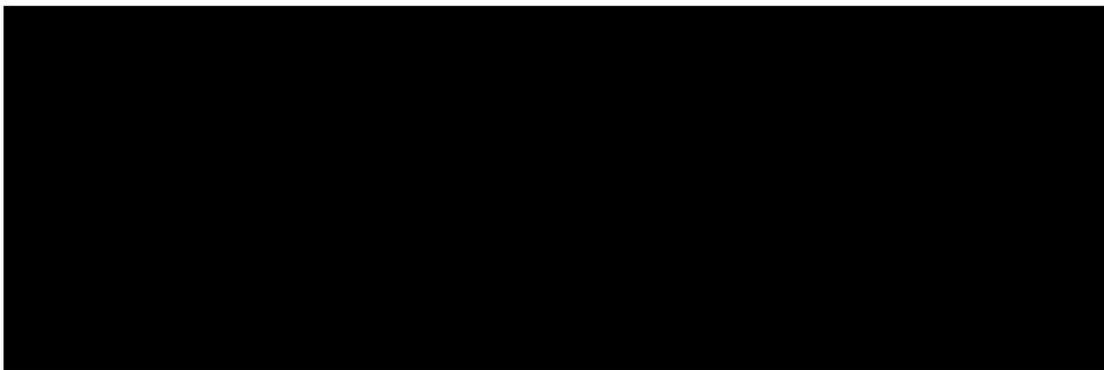
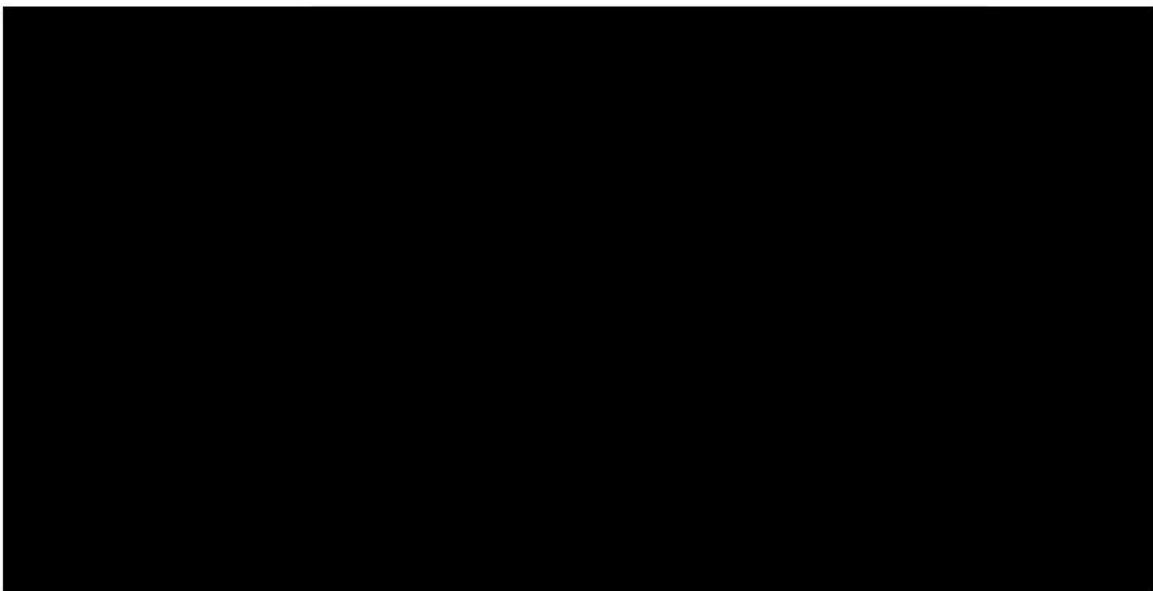


Figure 2: [REDACTED] (left) and [REDACTED] (right) at the Valley Stadium. Photos taken from [REDACTED] advertising dogs for rehoming direct from the track. [REDACTED] was subsequently found as a stray.

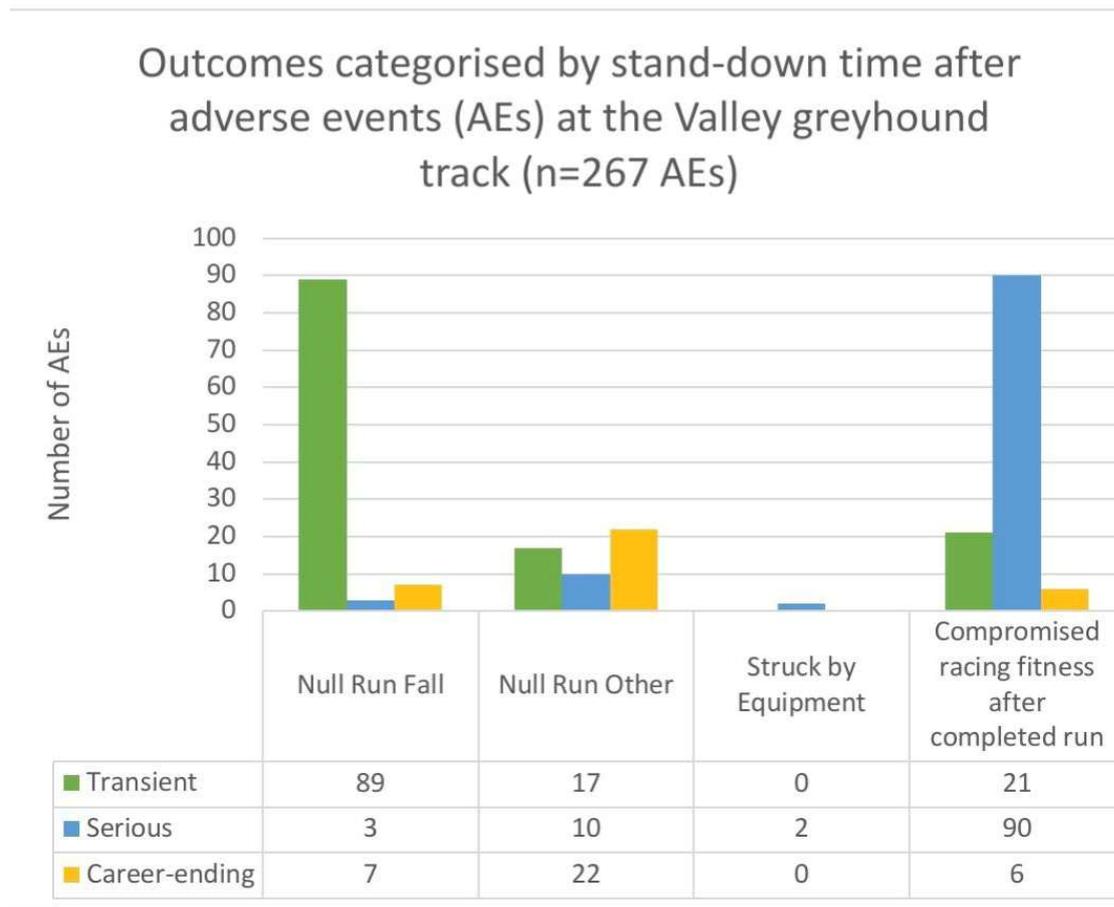


6. Adverse Events & Injuries at Valley Stadium under GBGB

- I. Whilst GBGB refuses to disclose track level injury and death data, detailed monitoring and analysis of GBGB results data livestream video and crucially partial injury data published by the Valley track itself (in its trial & race cards) means that GRW has been able to piece together a robust picture of the current scale of greyhound racing in Wales, and the frequency of adverse welfare events (falls, inability to finish race, struck by equipment, etc) and injuries suffered by dogs during the first year of GBGB racing in Wales (1st Nov 2023 - 31st Oct 2024). GRW's previous GWW Briefing (No.2) provides an initial summary and analysis of this data. Unsurprisingly, the Valley track no longer publishes any injury related data in its trial cards.
- II. The GRW's volunteer team of academics and a veterinary surgeon have since completed a further rigorous analysis of this data using time away from racing (stand-down times) to categorise the welfare outcomes for the dogs involved. To do this the New Zealand Racing Integrity Board's (RIB) framework which uses "standdown times" to classify the severity of adverse incidents and injuries, was adapted.
- III. It should be noted that the RIB concluded that this outcomes-based approach provides a more accurate account of what constitutes a serious race day injury, than initial track side veterinary diagnosis.^{xiii}
- IV. This analysis identified 601 individual dogs which ran at the Valley in 8484 race runs and 1126 trials runs (9610 total runs). Of these, 322 dogs were trained by [REDACTED]. Data shows these 322 Valley-attached dogs (53.6% of all dogs) accrued 85% (8183 of 9610) of individual runs. For this population of 601 dogs:
 - a. The annual incidence of adverse events and injuries was 44.4%, rising to 73.9% for 322 dogs in the Valley-attached subgroup.
 - b. A total of 267 adverse events and injuries were identified: Documented. Outcomes: 127 were categorised as Transient; 105 Significant; and, 35 Career-ending.

(See Table 1 below)
- V. A further 66 Valley-attached dogs were identified that appear to have stopped racing, for reasons unknown, before 31st October 2024 (20.5% of the Valley-attached subgroup).
- VI. Most adverse incidents in the Transient category were the result of dogs falling and hitting the surface of the sand track. The estimated average racing speed of greyhounds at Valley is approximately 35mph^{xiv}. It is therefore highly likely that greyhounds landing on the sand track surface sustain impact-related injuries (abrasions, bruising, swelling, pain, stiffness). Whilst some of these injuries will not be recorded as race-day injuries, they will nevertheless negatively affect the welfare of dogs.

Figure 3: Transient, Serious & Career-ending outcomes after adverse events (AEs) and documented compromised racing fitness after completed run (CRF-CR)



- VII. Documented lameness after a completed run most commonly resulted in breaks of 22 days or more (serious outcome). Injuries in this category are likely to include more severe lacerations, muscle tears and some fractures, tendon and ligament issues.
- VIII. “Career-ending injuries” likely include both more severe muscular skeletal, and other catastrophic, injuries. As noted above the number of dogs killed at the Valley track is not disclosed, however such fatalities would likely be included within this category.
- IX. 7% of falls were career-ending events. Several dogs hit a wall and were immediately incapacitated, did not finish (DNF) and never raced again.
- X. Career-ending outcomes were frequently noted after a null run without fall: e.g. the dog did not finish, or finished but was not given a time, but did not fall (22 dogs, 44.9% of null runs without fall). Injuries associated with strain and cyclic

loading from repetitive racing around oval tracks in counter-clockwise direction are commonly reported in racing greyhounds, particularly central tarsal bone fractures (Gibson 2024).

- XI. Our study design may capture dogs that became incapacitated during their race as a result of sustaining a stress fracture in the subgroup of dogs with career-ending outcomes after recording a null run without fall (of the 22 dogs in this subgroup, 19 were Valley-attached, 5.9% of all Valley-attached dogs). However, observations from livestreamed races indicated that dogs which showed abrupt changes in gait pattern or sudden loss of performance mid-race would often still finish the race with a recorded time. Therefore, analysis of Null run data may underestimate stress/fatigue injuries across all three outcome categories.

- XII. Since the WG announcement of its intention to ban greyhound racing in Wales we have noted a sharp decline in non-Valley-attached trainers racing their dogs at the track. GBGB data for the 3 months period, mid-May to mid-Aug 2025, recorded 309 active dogs. 283 were trained by [REDACTED] 4 were trained by [REDACTED] and no trainer was listed for 22 dogs (mostly recently imported Irish dogs not yet registered to [REDACTED]).

- XIII. As of mid August 2025, GBGB results data has recorded a total of 825 individual dogs as having raced or trialled at the Valley track since August 2023.^{xv} To date (4th Oct 2024) we have been able to identify 103 of these 825 greyhounds as having to been surrendered to rescue organisations.

Table 1: Summary of adverse events (AEs) and incidents of compromised racing fitness (CRF), categorised by outcome (stand-down time)

OUTCOME CATEGORY - STAND-DOWN TIME (days)	Compromised racing fitness Description	NULL RUN - FALL		NULL RUN - OTHER		STRUCK - DURING COMPLETED RUN		COMPROMISED RACING FITNESS AFTER COMPLETED RUN		TOTAL ADVERSE EVENTS		TOTAL OUTCOME CATEGORY (by stand-down time)		ANNUAL INCIDENCE OF ADVERSE EVENTS (calculated by outcome category)	
		All	Valley-att	All	Valley-att	All	Valley-att	All	Valley-att	All	Valley-att	All	Valley-att	All dogs (601)	Valley-att dogs (322)
TRANSIENT (stand-down 21 days or less)	Lame	1	1	9	9	0	0	16	15	26	25	127	110	21.1%	34.2%
	Cramped	1	1	2	2	0	0	3	3	6	6				
	Bitten	0	0	0	0	0	0	2	2	2	2				
	Unknown	87	71	6	6	0	0			93	77				
SERIOUS (stand-down 22 days or more)	Lame	1	1	7	6	0	0	88	83	96	90	105	97	17.5%	30.1%
	Cramped	0	0	1	0	0	0	0	0	1	0				
	Bitten	0	0	0	0	0	0	2	2	2	2				
	Unknown	2	2	2	2	2	1			6	5				
CAREER-ENDING (dog did not race again)	Lame	0	0	1	1	0	0	6	6	7	7	35	31	5.8%	9.6%
	Cramped	0	0	0	0	0	0	0	0	0	0				
	Bitten	0	0	0	0	0	0	0	0	0	0				
	Unknown	7	6	21	18	0	0			28	24				
Total adverse events	99	82	49	44	2	1	117	111	267	238	267	238	44.4%	73.9%	
Annual rate of adverse events %runs	per total runs *	1.03%	1.00%	0.51%	0.54%	0.02%	0.01%	1.22%	1.36%	2.78%	2.91%	2.78%	2.91%	44.4%	73.9%
Annual incidence of adverse events	per total dogs **	16.5%	25.5%	8.2%	13.7%	0.3%	0.3%	19.5%	34.5%						

* Total number of runs: 9610 runs, of which 8183 V-A runs

** Total number of dogs: 601 dogs, of which 322 V-A dogs

7. Economic Impacts of Banning Greyhound Racing in Wales

- I. As set out in the Explanatory Memorandum the economic impact from ending greyhound racing in Wales will be minor. The Valley Stadium is a small business, with limited supply chains, employing a small number of mostly part time employees. Local breeding is insignificant. Over 85% of the dogs raced at the Valley are imported from Ireland. For the period May-August 2025 there were [REDACTED] are based in Wales. However, many of these are hobby trainers with only a small number of dogs each, for whom greyhound racing is unlikely to be a primary source of their income.
- II. As noted above (Section 2, para VII), the lifelong support costs for dogs rehomed with old racing injuries is a significant financial burden for animal rescues and members of the Welsh public, who care for greyhounds that sustained serious racing injuries at the Valley track. These ongoing costs are in effect a direct subsidy paid by members of the public to care for dogs treated as wastage by the racing industry. In many cases these costs significantly exceed the run money “earned” by trainers/owners during the dog’s racing career. These costs should be explicitly recognised within the economic and social impact assessment of the draft Bill.
- III. It has been claimed in the Senedd that the Valley Stadium “...only became fully licensed by GBGB in 2023 after a £2 million upgrade to meet the standards set by the Greyhound Board of Great Britain.”^{xvi} This claim is not supported by the published accounts of Valley Greyhounds Ltd, for the period 20 September 2022 to 31 December 2023. These show a total of just £167,681 spent on improvements (to property, plant and machinery, fixtures and fittings and computer equipment) for the period this work was supposed to have taken place.
- IV. With respect the macro-economic impact of the UK greyhound industry as a whole, the GBGB’s 2023 report *The Economic Impact of Greyhound Racing in the UK* claims that the industry makes an annual contribution to the UK economy of £166m. However, the report also show that the industry takes £237.9m out of the pockets of UK consumers.^{xvii} Much of this from the pockets of low income and vulnerable families and individuals. This is not an industry which benefits the economic and social wellbeing of either the UK or Welsh populations as a whole.

[REDACTED]

6th October 2025

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- ⁱ From detailed monitoring GRW estimates the median career length of dogs leaving the track is 15 months (mean 16 months) and that approximately one third of the Valley-attached stock of greyhounds are replaced each year.
- ⁱⁱ This number is slightly lower than the current stock of Valley-attached greyhounds, as we believe perhaps up to a third, of the mainly younger dogs, will be sold of to trainers at English tracks.
- ⁱⁱⁱ <https://cgejournal.biomedcentral.com/articles/10.1186/s40575-019-0072-5>
- ^{iv} Racing Integrity Board, Greyhound Review Final Report, 12 December 2022, Section 6.2, PP 53-54
- ^v Licensed Greyhound Racing: Independently Verified Track Injury and Retirement Data for 2024, Published 26 June 2025, P. 6: <https://gbgb-prod-assets.s3.eu-west-1.amazonaws.com/wp-content/uploads/2025/06/26104723/Licensed-Racing-Track-Injury-and-Retirement-Data-2024-Commentary.pdf>
- ^{vi} Licensed Greyhound Racing: Independently Verified Track Injury and Retirement Data for 2024, Published 26 June 2025, P. 4 (Table: Fatalities across the registered racing greyhound population)
- ^{vii} Response from Greyhound Rescue Wales to: Licensing of animal welfare establishments, activities and exhibits, GRW, 2024 (available on request from GRW)
- ^{viii} GBGB Calendar: [REDACTED]
- ^{ix} Case Study of Adoption from the Valley Greyhound Stadium, Ystrad Mynach, Greyhound Rescue Wales, 2025, (available from GRW)
- ^x Case Study of Valley Greyhounds Found As Strays, Greyhound Rescue Wales, 2025, (available from GRW)
- ^{xi} GBGB Calendar, [REDACTED]
- ^{xii} <https://www.gov.uk/government/publications/animal-activities-licensing-guidance-for-local-authorities/dog-kennel-boarding-licensing-statutory-guidance-for-local-authorities#part-b--specific-conditions-providing-boarding-in-kennels-for-dogs-schedule-4-part-2-of-the-regulations>.
- ^{xiii} Racing Integrity Board, Greyhound Review Final Report, 12 December 2022, Section 6.2, P. 58, para 6.2.58
- ^{xiv} Calculated from racing distances and finish times
- ^{xv} Of these, 465 were most recently listed as trained by [REDACTED] (Please note, some dogs that were counted as Valley-attached dogs in the analysis of first year had subsequently moved to trainers that are not attached to the Valley track. Also, some trainers had changed their attachment to/from the Valley and other GBGB tracks, which further complicates categorisation of their dogs)
- ^{xvi} Samuel Kurtz MS (para 130) responding to Statement by the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs: The Prohibition of Greyhound Racing (Wales) Bill. <https://record.senedd.wales/Plenary/15365#A100013>
- ^{xvii} <https://gbgb-prod-assets.s3.eu-west-1.amazonaws.com/wp-content/uploads/2025/02/04091651/OO-GBGB-Report.pdf>

Huw Irranca-Davies MS
Deputy First Minister and Cabinet Secretary
for Climate Change and Rural Affairs
By email

9 October 2025

Dear Huw,

Financial implications of the Prohibition of Greyhound Racing (Wales) Bill

The Committee considered the financial implications of the Prohibition of Greyhound Racing (Wales) Bill (the Bill) at its meeting on 1 October 2025.

We note that the Regulatory Impact Assessment (RIA) estimates that the Bill would result in a net administrative saving of £11,000 over the five-year appraisal period from 2027-28 to 2031-32. To assist its scrutiny of the financial implications of the Bill, the Committee asks you to provide further information in response to the questions outlined in the annex. We would be grateful for a response by 14 November 2025.

I am copying this letter to the Culture, Communications, Welsh Language, Sport, and International Relations Committee.

Yours sincerely,



Peredur Owen Griffiths MS, Chair of the Finance Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg. | We welcome correspondence in Welsh or English.

Establishing the costs and benefits of the Bill

1. The Bill and Explanatory Memorandum were laid before the Senedd ahead of the Greyhound Racing Ban Implementation Group's Report and workplan, which is due this Autumn. Why have you taken this approach and how might the Implementation Group's Report impact on financial implications of the Bill?
2. What role has the Greyhound Racing Ban Implementation Group played in the preparation and review of the Regulatory Impact Assessment?
3. What specific evidence have you used to estimate the financial implications of the Bill and how have you engaged with stakeholders in deriving your estimates?
4. Why have you adopted a five-year appraisal period for the financial implications of the Bill?
5. What are the current annual costs incurred by relevant public bodies in Wales—including law enforcement, regulatory agencies, and any other stakeholders—in monitoring, investigating, and responding to issues relating to greyhound racing activities?

Specific costs associated with the policy proposals

6. The RIA notes nearly two-thirds of respondents to a public consultation supported a phased ban. How has this been reflected in the Bill and your estimate of its financial implications?
7. All quantified costs in the RIA relate to staff time to prepare bilingual guidance and for communicating the ban, but these do not include senior officials' oversight of the guidance or publicity material prior to their publication, or any non-staff costs. How confident are you that your estimates of the financial implications of the Bill are complete and accurate; how have you tested the reasonableness of your approach and the assumptions you have adopted in the calculations?
8. What is the estimated cost of the Greyhound Racing Ban Implementation Group and why has this not been included in the RIA?
9. The RIA does not quantify the financial loss to the only greyhound racecourse in Wales, Valley Greyhound Stadium. You note Valley does not publish full accounts but what steps have you taken to obtain financial information about its operation, including the consequences for its contract with Sports Information Services for live streaming of racing?
10. Will the owner of Valley Stadium be entitled to any compensation following the ban?

11. What assessment have you made of the impact of the ban on those directly or indirectly employed in the industry, as well as on the wider economy?
12. What consideration have you made of the approach taken to estimate the financial implications of the Bill in Scotland?
13. While noting the Bills differ, the Financial Memorandum for the Bill in Scotland includes a range of costs for rehoming retired greyhounds (an estimate of which you say would be “speculative”) and for prosecuting the small number of cases expected each year (you assume the cost of enforcement would be zero). On the basis of what evidence have you made different assumptions for these costs?

Methodology and approach to quantifying the benefits of the change

14. You say the “prohibition is expected to deliver a range of social, cultural, and animal welfare benefits” but you quantify only the cost-saving from a reduction in correspondence from individuals and stakeholders calling for a ban on greyhound racing. What benefits are likely to arise from the Bill and why have you not quantified them?
15. What methodology have you used to support the stated environmental benefits arising from the Bill?
16. What engagement have you had with Valley Greyhounds Limited about the future use of the stadium or land for alternative uses?

Post-implementation review

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

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.





A phased end to greyhound racing in the UK

Summary:

- Data pertaining to the remaining Scottish track and the welfare state of greyhounds is particularly lacking as there is no oversight of this track at all. We are therefore reliant on available evidence from other independent and licensed tracks across Great Britain.
- There are a range of concerns associated with the greyhound racing industry including the inherent danger of the sport, welfare challenges associated with every life stage, high wastage and a lack of transparency and traceability.
- It is impossible for each and every greyhound to experience a good life without substantial and widespread reform of the industry. Transforming the industry is severely limited not only by the ongoing lack of consistent and secure funding streams but because of the multinational nature of the industry and inadequate and inconsistent regulatory provisions within each nation.
- GBGB's welfare strategy is ambitious but fails to fully address the welfare issues throughout the sport, is heavily reliant on other stakeholders to ensure its delivery and is severely lacking in the funding to achieve its aims.
- The UK Greyhound Forum is intended to provide a mechanism to improve greyhound welfare. However, industry representation is limited, as well as the ability of GBGB to act on any welfare recommendations. The scale of improvements needed is so great that we don't believe it is possible for the forum to affect the change needed.
- Dogs Trust and the RSPCA have concluded that the only option to prevent racing from being inherently dangerous for dogs is to call for a phased end to greyhound racing.

1. Introduction:

Dogs Trust and the RSPCA are pleased to provide a written submission setting out our views on greyhound racing to aid SAWC's evidence gathering process. As SAWC are aware, we have recently conducted internal policy reviews on the welfare of racing greyhounds. As a result of these reviews, we are calling for greyhound racing to come to a phased end in the UK.

Within this submission we have provided our concerns with the racing industry [section 2], how this and other evidence shaped our policy [section 3], our views on the UK Greyhound Forum [section 4] as well as GBGB's welfare strategy [section 5].

2. Concerns associated with the racing industry

Within this section we have outlined some key concerns associated with the industry. However, it is important to note that for each and every greyhound to experience a good life from birth to death, widespread reform of the industry is needed. For example, this includes a need for independently funded regulatory oversight, a consistent and secure income stream and an industry-wide transition to racing on straight tracks (see Section 3). We do not believe that such wholesale reform is achievable especially given the multinational and disparate nature of the industry. Taking action on any of the below issues alone, or even a combination, would not be sufficient to enable all greyhounds to live a good life at each and every stage of their lives.

a. Greyhound racing is inherently dangerous for dogs

Greyhound racing is inherently dangerous for the dogs involved. Running at speed around oval tracks causes significant injury to many dogs, and in some cases the injuries are so severe that it is necessary to euthanise the dog as evidenced by GBGB's own data (Table 1).

There is sound evidence from research relating to track-related risks for greyhound injury, including how the track shape, surface, camber (slope), maintenance, starting box design and operation, as well as lure design, have been shown to contribute to racing being inherently dangerous for greyhounds.

Since 2018, following a non-regulatory agreement with Defra, the Greyhound Board of Great Britain has published annual data on injuries, euthanasia and rehoming. This data has shown that significant numbers of greyhounds are injured and euthanased every year (Table 1). However, there is a lack of clarity around these categories making comparisons of change or progress over multiple years very challenging and raising questions around the transparency of the regulated industry. Furthermore, citing the percentage of injuries and deaths as a proportion of dog runs, which is a very large number, means that the percentage results will be very small and therefore the result will always be a low percentage.

Information around the number of tracks, dogs, race meetings, races, times and frequency that an individual dog is raced as well as identification of the tracks at which injury and deaths occurred and when a dog died or was euthanased relative to the last time raced would greatly increase with understanding the results but this is not provided.

Unlike the licensed sector, there is no requirement for injury or fatality data to be published by unlicensed tracks and so the true impact of racing on dogs racing on independent tracks is unknown. In Wales (where there is only one independent track) between 2018 and 2021, Hope Rescue's Amazing Greys project helped 200 greyhounds; 40 of these dogs endured serious, career ending injuries.

Table 1. GBGB data on racing greyhound injuries and euthanasia for 2018 to 2021.

Year	Total injuries	Total dog runs	% of total injuries against total runs	Number of dogs PTS on humane grounds trackside	Number of dogs PTS due to treatment costs/poor prognosis	PTS for humane grounds trackside & treatment costs/poor prognosis as % of total deaths
2018	4963	426,139	1.16	242	180	45
2019	4970	410,607	1.21	207	123	46
2020	3505	318,346	1.12	200	24	55
2021	4422	359,083	1.23	120	9	36

b. Lack of a secure and consistent funding source:

We are also concerned with regard to the financial stability of the greyhound racing industry. Unlike the horse racing industry, there is no statutory levy in place for greyhound racing despite much discussion with UK Government departments including the Department for Culture, Media and

Sports. Bookmakers do have the option of making voluntary contributions to the industry via the British Greyhound Racing Fund (BGRF), but the voluntary nature of these contributions places the industry in a precarious situation. The contribution from the bookmakers has been set at 0.6% for many years, which at the end of March 2020 equated to £8.8m. However, at the end of March 2021, BGRF reported a decrease of £2m a year and stated that they expected this effect to continue for some time. This will have a profound effect on the funding available for existing and newly proposed welfare initiatives.

Indeed, at the time of the Dogs Trust and RSPCA review, many actions within the GBGB's welfare strategy were unfunded: 46% of short term, 53% of mid term and 80% of long term actions. The absence of funding to realise these goals is concerning and questions the ability for the industry to attain more acceptable welfare standards than currently exist in this current climate and without a significant change in their income source. However, even if the actions were fully funded, the ability for the strategy to achieve a good life for each and every greyhound remains highly doubtful (see Section 5).

A further example of the impact of the lack of funding availability is the Greyhound Retirement Scheme. This scheme releases £400 to rehoming organisations for each greyhound rehomed. However, Dogs Trust data on the veterinary costs to treat 14 injured greyhounds between November 2018 and April 2021 shows that veterinary treatment alone ranged from £690 to £4800. For injured dogs leaving the industry in particular, the £400 is significantly lower than the likely cost required to treat and rehome them.

c. The presence of welfare issues at every stage of the greyhound's life cycle:

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

d. Inconsistencies in requirements and provisions to protect greyhound welfare:

The greyhound industry is spread across five different nations: the Republic of Ireland, Northern Ireland, Wales, Scotland and England. The regulatory oversight across these nations does not provide a minimum standard for greyhounds that assures a life worth living and there are inconsistencies throughout the different nations. For example, the Welfare of Racing Greyhound Regulations (2010)¹ only apply to England and only to the time greyhounds spend at the race track; not to the other stages of their lives, in particular the trainers' kennels where they spend most of their time. Within nations, there are also inconsistencies. For example, in Scotland the existing track isn't covered by the English regulations, it isn't regulated by GBGB and there is no licensing necessary by the Local Authority meaning that there is no oversight at all.

Despite these types of issues being identified as part of Defra's Post Implementation Review of the Regulations in 2015, the legislation in England has yet to be amended - 8 years after the Post-Implementation Review and 13 years after the legislation was first introduced.

The disparate nature of the industry also limits any impact GBGB can have in making improvements to aspects of a greyhound's life outside the racing stages. For example, within GBGB's welfare

¹ <http://www.legislation.gov.uk/ukdsi/2010/9780111489727/contents>

strategy, the importance of breeding decisions and early years husbandry to lifetime welfare is acknowledged and is one of the reasons that the strategy extends across greyhound's lifetimes rather than focusing exclusively on the dog's racing career. However, it is also stated that the GBGB is only able to implement the substantial proposals in the document within GBGB's jurisdiction which is Great Britain and the licensed sector. With 85% of greyhounds typically born and raised to a year old in the Republic of Ireland, GBGB's ability to ensure a good standard of welfare across all life stages is very limited.

e. Lack of regulations to cover trainers' kennels:

Regulations in England and GBGB's rules of racing require that kennels must be provided for at least 20% of the total number of greyhounds present at the track at any one time for racing or trialling and that the kennels must meet the requirements set out in the conditions. As the track in Scotland falls outside both these sets of regulations there are no standards to regulate trackside kennels.

Regulations in England do not ensure the welfare of greyhounds outside of tracks, despite greyhounds spending the majority of their time in trainers' kennels, and instead guidance is issued within the Greyhound Board of Great Britain's voluntary code of practice. The extent to which training is provided to aid compliance with the code is unknown as well as how it is enforced. Again, Scotland's track is not governed by GBGB and so there is no regulatory protection for trackside or trainer's kennels. Given that many greyhounds spend the vast majority of their time in trainers' kennels, this is critical, especially as a Dogs Trust investigation in 2015 provided stark evidence that the current regulations are insufficient to address the welfare concerns associated with trainers' kennels.

f. Lack of transparency and traceability:

Without full transparency relating to the number of dogs being born in, or imported to the UK, registered, and entering the racing industry each year, their subsequent racing longevity and clear exit data (i.e., in clearly defined, explainable and stable categories over time) it is challenging to understand the passage of individual greyhounds and their welfare experience. With most dogs bred, reared and educated on private properties outside of the UK, there is little or no visibility of the whole life experience of greyhounds in the UK racing on GBGB tracks, and even less for greyhounds racing in the independent sector. There is no UK-wide (compatible with Ireland) database for greyhounds; other countries are undertaking national traceability programs (e.g. The [National Horse Traceability Working Group](#) in Australia).

There is no data available about the track in Scotland and even those tracks governed by GBGB do not publicly display or release injury data by racetrack, 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.

g. High levels of wastage:

The issue of oversupply and wastage has long been a concern within the greyhound racing industry. There is no data available about the independent industry although data from GBGB highlights the need to eliminate oversupply and wastage. Data from the last five years shared by GBGB, excluding the dogs that are euthanased or die, shows that by the age of 3.5yo, 50% of greyhounds registered to race have left the licensed racing industry and by the time greyhounds are 4yo only 30% remain. The greyhound lifespan is between 10 and 14 years, however, around 65% of greyhounds leave the

licensed racing industry between the ages of 2-4yo and 90% of greyhounds are no longer racing by 5 years of age.

In 2021, there were 12,960 Irish bred puppies registered at the time of whelping yet approximately 10% were not registered at 12 months of age meaning over a 1000 puppies were unaccounted for. In Great Britain similar patterns were seen with around 13% less dogs being registered to race under GBGB compared with numbers of puppies registered on the Greyhound stud book.

h. Reliance on the charity sector for rehoming:

There has been a steadily growing role of rescue and rehoming agencies in finding homes for greyhounds exiting GBGB-licensed racing, which is around 5,000 dogs annually (range 4,297-5,484 per year observed over the last five years). Charities have rehomed over 70% of these greyhounds, with The Greyhound Trust responsible for the majority (3,761 in 2020, plus an additional 157 greyhounds transported from Ireland by Greyhound Racing Ireland for rehoming within the UK).

i. A declining industry:

In the 1940s, there were 77 licensed tracks and more than 200 independent tracks in the UK. The numbers have steadily declined to 23 active regulated and three independent tracks on which greyhounds race in 2022. The industry has also witnessed a significant long term decline in attendance which has accelerated in recent years. Attendances dropped from 2 million in 2010 to 1.4 million in 2018. Globally, greyhound racing is in decline and only exists legally in seven locations: the UK, Ireland, Australia, New Zealand, the United States of America, Mexico and Vietnam.

3. The development of Dogs Trust and RSPCA policy on Greyhound Racing

As part of our independent review, the following changes were identified which would be necessary to help racing greyhounds experience and be assured of a life worth living:

- ★ Compulsory and independently enforced five domains model-based animal welfare standards for all greyhounds
- ★ One UK wide, Republic of Ireland compatible, microchip based identification and fully transparent database allowing real time data to be accessed online and publicly accessible across all life stages.
- ★ Transparent collection and independent verification of birth, death and injury data.
- ★ Accountability for dogs exiting racing
- ★ Independently funded regulatory oversight and enforcement
- ★ Unannounced animal welfare checks and enforcement
- ★ Address oversupply and wastage of greyhounds
- ★ Mandatory education and background animal welfare checks for all participants
- ★ Disciplinary matters to operate independently from commercial and oversight bodies
- ★ Independent regulatory body to proactively address the use of banned substances
- ★ Public reporting of enforcement outcomes
- ★ Action on racetrack safety to eliminate the danger of injury and death. The evidence base indicates an industry-wide transition to racing on straight tracks is required.
- ★ Export of greyhounds outside of the UK to be banned
- ★ Funding security for greyhound welfare assurance

Recognising that significant changes are necessary to provide a good life for racing greyhounds, a range of options for future action were identified. The options ranged from continuing to work with industry toward the goal of transparently enforced high welfare standards through to calling for an

immediate ban on greyhound racing. As well as identifying the welfare impact of the options and those which could guarantee racing greyhounds a good life, each was also considered with the following in mind:

- ★ the provision of sufficient financial resources for greyhounds at all stages of their life to ensure they experience a life worth living
- ★ impact on employment and alternative careers
- ★ political appetite and
- ★ public attitudes and calls for change.

The outcome of similar options in other geographies were also considered. ***The only options presented within the review that could prevent racing from being inherently dangerous for dogs were those involving a phased end to, or immediate ban on greyhound racing.***

Dogs Trust and RSPCA subsequently separately reviewed and changed their policy positions to call for a phased end to greyhound racing across the UK. We are specifically calling for a phased end to racing rather than an immediate ban so that we can carefully plan and coordinate the care of the many dogs who will be affected. Based on the current rehoming rates and channels, it is expected that an end is feasible within five years given the number of dogs in the industry.

4. The UK Greyhound Forum:

The Greyhound Forum comprises animal welfare organisations and industry bodies working together to improve racing greyhound welfare. Dogs Trust and the RSPCA have been working with the greyhound racing industry for many years to try to improve conditions for the dogs involved in the sport. While this has led to some improvements, the charities believe there are still significant welfare issues for racing greyhounds which have not been resolved and cannot be resolved.

Examples of improvements to welfare which have been achieved via the Forum include the banning of anti-bark muzzles in trainers' kennels. A further example is the development of the GBGB fireworks policy. However, despite the introduction of welfare based policies marking some progress to improve welfare, robust provisions provided by the welfare members are typically rejected by GBGB. Despite being the regulator of the sport it appears their ability to act is limited. For example, when considering the fireworks provisions, they stated that they are unable to stop racing, they can only advise that racing is scheduled sympathetically. Furthermore, although improvements made by the forum have the potential to safeguard greyhound welfare, overall their welfare impact is fairly limited. Issues which have the potential to improve the welfare of all dogs within the industry and to an acceptable standard, for example, changing the shape of the racetrack or ensuring transparent data collection, have not sufficiently progressed and we do not believe that sufficient progress can be made by the Forum in its current form.

We are unconvinced that the current structure of the Forum is sufficient to achieve the significant change needed to resolve these serious welfare concerns. As one example, the industry representation on the Forum is limited to the GB regulated sector only and does not include representatives from RoI or independent tracks (including the independent track in Scotland).

Following a change in policy, there has been much discussion about whether or not Dogs Trust and the RSPCA should remain members of the forum. It has been agreed that both organisations can

remain members with the terms of reference revised accordingly although Dogs Trust and RSPCA will not be able to attend parts of the forum meeting where confidential information is being shared which does suggest that the two organisations are not full members unlike others, and will therefore have limited welfare influence. This arrangement will be revisited once the new approach has been tested over a number of meetings.

5. The GBGB's welfare strategy:

Dogs Trust and the RSPCA have several concerns around the GBGB's welfare strategy. While it is stated that GBGB sought, received and listened to a wide range of views and comments on current and aspirational welfare through engagement with stakeholders including canine welfare charities (members of the Greyhound Forum), our input was very limited and extended to a paper based exercise which invited us to identify welfare issues associated with each stage of the greyhound's life using the five domains welfare framework.

Unfortunately the welfare members of the Forum were not invited to comment on any early drafts of the strategy and were unaware about its publication until its release was imminent. Furthermore, there were no discussions held with Dogs Trust or RSPCA about the need for partnership working to ensure the delivery of the strategy. This reliance on partnership working calls into question the likelihood of, and ability for, the strategy being fulfilled. As such, we are particularly concerned that should the strategy fail to deliver, it would not only be GBGB who are held to account but other stakeholders too.

Having reviewed the strategy and understanding its intention to provide a good life for greyhounds, we are concerned about its failure to consider all the factors likely to affect the welfare state and quality of life of racing greyhounds. For example, actions which would provide behavioural opportunities and improve the dog's emotional state are lacking in comparison to the focus on health and nutrition. Furthermore the need for greyhounds to be psychologically (adaptable to new environments and stressful situations) and physically resilient (breed for resilience rather than speed) suggests that the dog needs to adapt to the industry rather than changing the industry to ensure it is welfare compatible.

There are also very clear omissions from the strategy which, if included, could better protect the welfare of the dogs involved. Greyhound racing is inherently dangerous for the dogs involved and running at speed around oval tracks causes significant injury to many dogs, and in some cases death. The failure to look at changing the shape of the racetrack and in the absence of radical change leaves greyhound racing open to injuries to dogs and unnecessary deaths.

ENDS.

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COVER PHOTO: ROBIN CULLEY/RSPCA PHOTOLIBRARY

The fate of racing greyhounds and working lurchers in Wales



All Party Group for Animal Welfare

A survey of greyhounds and lurchers entering local authority pounds in Wales



In association with
Greyhound Rescue Wales
Registered charity no. 1059733

Pack Page 143



It is feared that many greyhounds will be killed by their owners once they retire from the track.



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Introduction

Lorraine Barrett AM,
Chair of the All Party Group for Animal Welfare
in the National Assembly for Wales

The All Party Group for Animal Welfare was the first All Party Group to be set up in the Assembly and I have been privileged to have chaired it from its inception. I would like to record my thanks here to members of the other political parties who have given me support over the past four years as officers of the group.



Lorraine Barrett AM, chair and Geraint Davies AM, vice-chair, with Annette Crosbie and members of Greyhound Rescue Wales at the launch.

All Party Groups have a long history in Westminster and exist both there and in the Assembly to allow members of all political parties to discuss issues that are usually not specifically covered by statutory committees. The RSPCA has supplied the administration and secretariat for both Groups and we have the support of many AMs across the four political parties and an associate membership of over 40 animal welfare charities and organisations, and the list is growing.

We decided to use the official launch of the All Party Group for Animal Welfare in February 2001 to highlight the fate of greyhounds once they were no longer wanted for racing. Annette Crosbie, known for her highly popular acting portrayal of Mrs Meldrew in the BBC's *One Foot in the Grave*, has long been an active and enthusiastic campaigner for greyhounds and she agreed to attend the launch. It was her presentation at our meeting and the information provided by Greyhound Rescue Wales, an associate member of the Group, that prompted us to find out more information and produce a report that could provide us with the hard facts. You will see those hard facts when you read this report. We all want the information contained in the report to be the foundation for cooperation between all interested parties to work together to improve the welfare of greyhounds in Wales.

Lorraine Barrett AM

Many racing greyhounds and working lurchers are successfully rehomed.



GEOFF DU FEU/RSPCA PHOTOLIBRARY

Executive summary

The 'nine fates' of the racing greyhound and working lurcher. A racing greyhound or a working lurcher can expect to meet one of nine fates at the end of its working life, some of these are acceptable others are unacceptable.

The 'nine fates' of racing greyhounds and working lurchers

Unacceptable

- 1 Abandoned and taken to local authority pound.
- 2 Abandoned and die without being found.
- 3 Euthanased by vet.
- 4 Killed by racing/working owner.
- 5 Abandoned, then found and kept by a member of the public.
- 6 Abandoned, then taken and rehomed directly by a rescue organisation.

Acceptable

- 7 Kept by racing/working owner as a pet.
- 8 Handed to rescue organisation by racing/working owner, then rehomed successfully by rescue.
- 9 Rehomed successfully to a good home by racing/working owner.

Hard facts. This survey of local authority pounds allows an absolute score to be put on the first of these nine fates. It is the first time that research has been carried out on this issue in a rigorous way, by a near-complete survey of local authority pounds in a discrete geographical area.

A major animal welfare problem exists. The study shows that large numbers of greyhounds and lurchers are abandoned once they are no longer useful and proves beyond doubt that a major animal welfare problem exists. The study shows that the argument that most are kept as pets by their owners cannot be sustained.

140 greyhounds are abandoned in Wales, and 2,800 in Britain, every year. 140 greyhounds are abandoned and collected by local authority pounds in Wales each year. This suggests that about 2,800 greyhounds are abandoned and taken in to local authority pounds in Britain. The numbers of greyhounds taken into local authority pounds alone therefore shows that abandonment of former racing greyhounds constitutes a major animal welfare problem.

Many more die in other ways but more research is needed. Many more greyhounds will meet other unacceptable fates such as being abandoned and dying without being found or being killed by their owners. This makes it likely that the total number of greyhounds killed, or discarded in other ways at the end of their racing career in Wales is closer to 400 to 600 per year. This suggests that between 8,000 and 12,000 are probably killed or discarded in other ways in Britain as a whole. More research is needed to verify these estimates.



The abandonment of greyhounds and lurchers costs local authorities in Wales almost £100,000 a year.



ROBIN CULLEY/RSPCA PHOTOLIBRARY

The research shows that the Swansea area is Wales' hotspot for abandoned greyhounds.

The research shows that Swansea is by far the worst area for abandoned greyhounds in Wales. Wrexham, Flintshire, Merthyr Tydfil and Neath Port Talbot have the next highest figures for abandoned greyhounds.

The greyhound racing industry is inextricably linked to the plight of these animals. There is an independent greyhound track in, or adjacent to, each of the worst areas for abandoned greyhounds. This indicates a clear relationship between the existence of a greyhound track and the abandonment of greyhounds.

The abandonment of these animals costs local authorities in Wales more than £30,000 a year, and local authorities in Britain more than half a million pounds a year. The greyhounds taken into pounds in Wales will cost local authorities about £32,000 per year. Transposed to Britain as a whole this amounts to a total cost of £600,000. This cost falls to local authorities because the racing industry, and in particular the independent sector, fails to make proper provision for greyhounds when they retire.

New controls are needed on independent greyhound racing. The report calls upon the Department for Environment, Food and Rural Affairs (DEFRA) and the National Assembly for Wales to control the independent greyhound racing sector through new legislation in the forthcoming Animal Welfare Bill. It specifically calls for all independent tracks to be licensed by local authorities.

The independent racing industry must take full responsibility for the costs of racing. The report calls upon the independent greyhound racing industry to take full responsibility for the welfare of greyhounds through helping to raise funds to care for retired dogs and by taking effective action to stamp out abuse.

Almost 300 lurchers are abandoned in Wales each year. 290 lurchers are abandoned and collected by local authority pounds in Wales each year. There is therefore an even bigger problem with abandoned lurchers than with abandoned greyhounds.

The research shows that the Merthyr Tydfil area is Wales' hotspot for abandoned lurchers. Merthyr Tydfil has about three times as many lurchers per head of population being taken into the local pound as the next highest placed authority. Wrexham, Pembrokeshire, Powys and Blaenau Gwent have the next highest figures.

Abandoned lurchers cost local authorities in Wales almost £70,000 a year, and local authorities in Britain well over a million pounds a year. The lurchers taken into pounds in Wales will cost local authorities about £67,000. Transposed to Britain as a whole this amounts to £1,350,000. This cost falls to local authorities, largely because of the widespread abandonment of working lurchers once they are no longer able to hunt successfully.

Action is needed to help lurchers. The report also highlights the need to address the problem of abandoned lurchers. It calls upon established greyhound rescue organisations to take in lurchers as well as greyhounds and identifies the need for a dedicated 'lurcher rescue' organisation in Wales.

The study

The study was carried out through the All Party Group for Animal Welfare at the National Assembly for Wales in association with Greyhound Rescue Wales.

This report of a survey of local authority pounds in Wales fills an important gap in our knowledge of the scale of the problem of abandoned greyhounds by presenting the total numbers of greyhounds taken in by local authority pounds in Wales over a 12-month period. The survey also asked about numbers of lurchers (greyhound cross-breeds) taken in by local authority pounds. These figures are shown separately.

The total numbers of greyhounds entering and leaving the greyhound racing industry in Britain has been estimated. However, until now, there have been no figures available for greyhounds meeting different fates once their racing career was over. This absence of hard figures has allowed some people to claim that only very small numbers of greyhounds were not properly cared for once their racing career ended.

However, Greyhound Rescue Wales' (GRW) experience since the organisation began in 1993, is that large numbers of greyhounds are abandoned once they finish racing, and that large numbers are also destroyed. Other greyhound rescue organisations have made similar arguments. However, in the absence of hard figures, neither the industry's nor the rescue organisation's claims could be substantiated. The need for credible research has therefore been clear for a long time.

This study is based on a questionnaire (appendix one). This was administered by post and follow-up telephone calls were made to maximise response. Nineteen out of the 22 Welsh local authorities responded, a response rate of 86 per cent. The figures are for a full 12-month period over 2000-2001. The study is based on Wales but findings are extrapolated to Britain as a whole where appropriate.





Many greyhounds and lurchers are abandoned and are then rehomed by a rescue organisation.

CHERYL A ERTEL/KSPCA PHOTOLIBRARY

The context of the study



A racing greyhound or working lurcher will meet one of nine fates at the end of its working life.

DAVID DALTON/RSFCA PHOTOLIBRARY

The nine 'fates' of the racing greyhound and working lurcher

Greyhounds, once they finish racing (and lurchers when they finish working) can expect to meet one of nine 'fates'. Some of these are acceptable, some are not. However some unacceptable fates, through good luck, have positive outcomes, for example, an abandoned greyhound may be taken into a local authority pound or a rescue organisation's kennels and eventually be found a home as a pet.

This study identifies how many greyhounds and lurchers are abandoned and subsequently go through local authority pounds in Wales each year (fate number one). However this is only part of the problem of abandoned and unwanted greyhounds and lurchers. Many will meet other fates which can be even worse.

Figure one summarises these fates.

Fig one

The 'nine fates' of racing greyhounds and working lurchers

Unacceptable

- 1 Abandoned and taken to local authority pound.
- 2 Abandoned and die without being found.
- 3 Euthanased by vet.
- 4 Killed by racing/working owner.
- 5 Abandoned, then found and kept by a member of the public.
- 6 Abandoned, then taken and rehomed directly by a rescue organisation.

Acceptable

- 7 Kept by racing/working owner as a pet.
- 8 Handed to rescue organisation by racing/working owner, then rehomed successfully by rescue.
- 9 Rehomed successfully to a good home by racing/working owner.

The experience of GRW since 1993 has allowed the charity to gather a good deal of information, and to arrive at some tentative conclusions about the numbers of greyhounds meeting each fate.

Many greyhounds will be abandoned and die without being found. However, it is very difficult to estimate how many will meet this end (fate number two).

Some owners are also known to take unwanted greyhounds to the vet's to be euthanased (fate number three), although a common complaint among some owners is that this costs too much (about £40).

It is the fear of greyhound rescue organisations, that as many greyhounds will be killed by their owners once they 'retire' as are taken to local authority pounds. There has been information handed to rescue organisations about regular shootings of unsuccessful greyhounds after race nights in Wales (fate number four).

Local authorities have a statutory responsibility towards stray dogs. Many larger, longer-established animal welfare organisations will therefore allow stray dogs to spend a seven-day period in a local authority pound before taking them into their care. This is because the local authority may, after seven days, legally transfer ownership of the animal to a third party such as a welfare organisation. This avoids future complications as legal ownership of the animal is clearly established (if a dog does not go through a local authority pound a minimum period of 28 days is required before a member of the public or welfare organisation can claim ownership). However, many people are not aware of the legal situation. Consequently members of the public will frequently rescue a stray dog and keep it themselves and many smaller welfare organisations will take in strays directly and rehome them themselves without the dog ever entering a pound (fates five and six). Again there are clear indications that large numbers of greyhounds and lurchers meet

these fates, which although they may have a positive outcome, remain unacceptable because the dog is initially abandoned.

Greyhound Rescue Wales is also increasingly being asked to take retired dogs by their racing owners (fate number eight). The charity currently takes into its care about as many dogs directly from owners as are accepted from local authority pounds. The charity welcomes such requests and gladly takes the dogs when possible, but its ability to respond to this need is limited by resources.

Of course, some racing owners take responsibility for their dogs and either keep them as family pets or take care to find them a good home as a family pet when they retire. However these are just two out of the nine fates that will befall a racing greyhound when it retires.

This survey of local authority pounds then allows an absolute score to be put on one of these nine fates. It is the first time that such research has been carried out in a rigorous way by a near complete survey of local authority pounds in a distinct geographical area. Previous surveys have used large-scale postal surveys which resulted in a low response rate¹.

Further research will be necessary to fill more of the remaining gaps. Nevertheless the findings of this survey mean that for the first time it is possible to prove beyond doubt that a major animal welfare problem exists.

The structure and scale of the greyhound racing industry

Greyhound racing in Britain is divided into the registered sector and the independent (or unregistered) sector. Dogs racing in the registered sector

receive some protection from regulations designed to reduce the risk of injury while racing and to achieve acceptable kennelling standards. Many are also found homes on retirement by the Greyhound Trust which receives substantial funding to find homes for ex-registered sector dogs.

The independent sector is completely unregulated and standards are entirely dependent on the track manager. The independent sector makes no organised provision for the welfare of the dogs on retirement and their fate is entirely dependent on their owner. In its defence the independent sector has argued that most dogs are kept as family pets by their owners when they retire. However, the findings of this study will show that this argument cannot be sustained.

There are 31 registered greyhound tracks in Britain², and 21 unregistered tracks³. Of these, four of the independent tracks are either in Wales or very close to Wales. They are: Bedwellte (near Tredegar), Ellesmere Port, Swansea, and Valley Stadium (near Caerffili). There are no registered tracks in or adjacent to Wales. The nearest registered tracks to Wales are in Manchester, Birmingham and Swindon.

Estimates about the total number of greyhounds leaving the industry each year vary between about 20,000 and about 30,000. For example, Greyhounds UK, using figures provided by the registered racing industry say that 9,000 greyhounds leave the registered sector each year and about the same number probably leave the independent sector⁴. Another group, Greyhound Action, estimate that about 30,000 greyhounds leave both sectors of the industry each year⁵. Historically, Greyhound Rescue Wales has used the more conservative estimate of 20,000

Findings – greyhounds

Overview

Figure two lists all the Welsh local authorities and the total number of greyhounds abandoned in each area over a 12-month period.

The local authorities are listed in ranked order according to the number of greyhounds abandoned each year in relation to the total population. So Swansea, ranked at number one has more abandoned greyhounds in relation to population than Flintshire ranked at number two. For example Swansea has a population of 223,300 and 32 abandoned greyhounds giving a ratio of one abandoned greyhound for every 6,978 people while Flintshire has a population of 148,600 and 12 abandoned greyhounds giving a ratio of one abandoned greyhound for every 12,383 people. Merthyr Tydfil which has a relatively small population is ranked in fourth place, above Neath Port Talbot even though more greyhounds in total were abandoned in Neath Port Talbot, because Neath Port Talbot has a much larger population.

Fig two: Greyhounds taken into local authority pounds in Wales

Local authority	Total no of greyhounds	Rank
Swansea	32	1
Flintshire	12	2
Wrexham	10	3
Merthyr Tydfil	4	4
Neath Port Talbot	9	5
Monmouthshire	5	6
Gwynedd	6*	7*
Ceredigion	4*	7*
Torfaen	4*	7*
Powys	6	10
Denbighshire	4	11
Carmarthenshire	7	12
Conwy	4	13
Pembrokeshire	4	14
Bridgend	4	15
Anglesey/Ynys Mon	2	16
Caerffili	5	17
Cardiff	9	18
Rhondda Cynon Taff	6	19
Blaenau Gwent	1	20
Vale of Glamorgan	1	21
Newport	0	22
TOTAL	139	

*Estimates for non-respondent local authorities.

The three non-respondent authorities of Ceredigion, Gwynedd and Torfaen are assigned the average rate of abandonment in relation to population and are ranked accordingly. The full population figures and ratios upon which this table is based are shown in appendix two.

The scale of the problem

- n About 140 greyhounds are abandoned and collected by local authority pounds in Wales in a one-year period.
- n Given that Wales has about five per cent of the population of Britain, it is therefore likely that about 2,800 greyhounds are abandoned and taken into local authority pounds in Britain. The number of greyhounds taken into local authority pounds alone therefore shows that abandonment of former racing greyhounds constitutes a major animal welfare problem.
- n However, these figures do not include all the greyhounds meeting other unacceptable fates ie those that are abandoned and die without being found, those euthanased by vets and those killed by their owners. If these fates were included the total number of dogs killed, or discarded at the end of their racing career in Wales would probably be several times the 140 figure quoted. This suggests that a total figure of between 400 and 600 greyhounds meeting unacceptable fates in Wales each year and between 8,000 and 12,000 in Britain as a whole would be a conservative estimate.

The location of the problem – five hotspots for abandoned greyhounds

- n Swansea stands out as a hotspot as it is by far the worst area for abandoned greyhounds in Wales. Swansea has one of the three greyhound tracks in Wales.
- n Flintshire and Wrexham come second and third indicating a real problem in north-east Wales close to the independent greyhound track at Ellesmere Port, Cheshire, just over the border in England.

- n Other areas where there is a significant problem are Merthyr Tydfil in fourth place, which is close to the two other Welsh greyhound tracks in Ystrad Mynach and Bedwellte, and Neath Port Talbot in fifth, which is close to the Swansea track.

- n This pattern suggests a direct relationship between proximity to a greyhound track and the numbers of greyhounds being taken into pounds.

- n Questions remain about the outcomes regarding Caerffili and Blaenau Gwent (close to two of the three Welsh tracks) which have an apparently low ratio of abandonment. However Greyhound Rescue Wales is aware that these are areas where the shooting of unsuccessful dogs could be commonplace. Responsible owners repeatedly provide information to Greyhound Rescue Wales about greyhounds being taken to isolated rural properties in this area, often immediately after failing in a race, where they are later shot and disposed of in return for a small cash payment.

The financial cost

Local authorities in Britain spend a total of £27 million on stray dogs each year. This is the equivalent of £230 for every stray dog¹.

- n The greyhounds taken into pounds in Wales will cost local authorities about £32,000 per year.

- n Transposed to Britain as a whole this amounts to a total cost of £600,000.

- n This cost falls to local authorities because the racing industry, and in particular the independent sector, is failing to make proper provision for all greyhounds when they retire.



RSPCA

Findings – lurchers

Overview

Although the majority of dogs rescued by Greyhound Rescue Wales are pure-breed greyhounds, Greyhound Rescue Wales also aims to rescue greyhound cross-breeds (lurchers) whenever possible. Lurchers are traditionally bred and kept for hunting rabbits and also have a limited ‘useful working life’.

The survey therefore also enquired about the numbers of lurchers going through local authority pounds.

Figure three lists all the Welsh local authorities and the total number of lurchers abandoned in each area over a 12-month period.

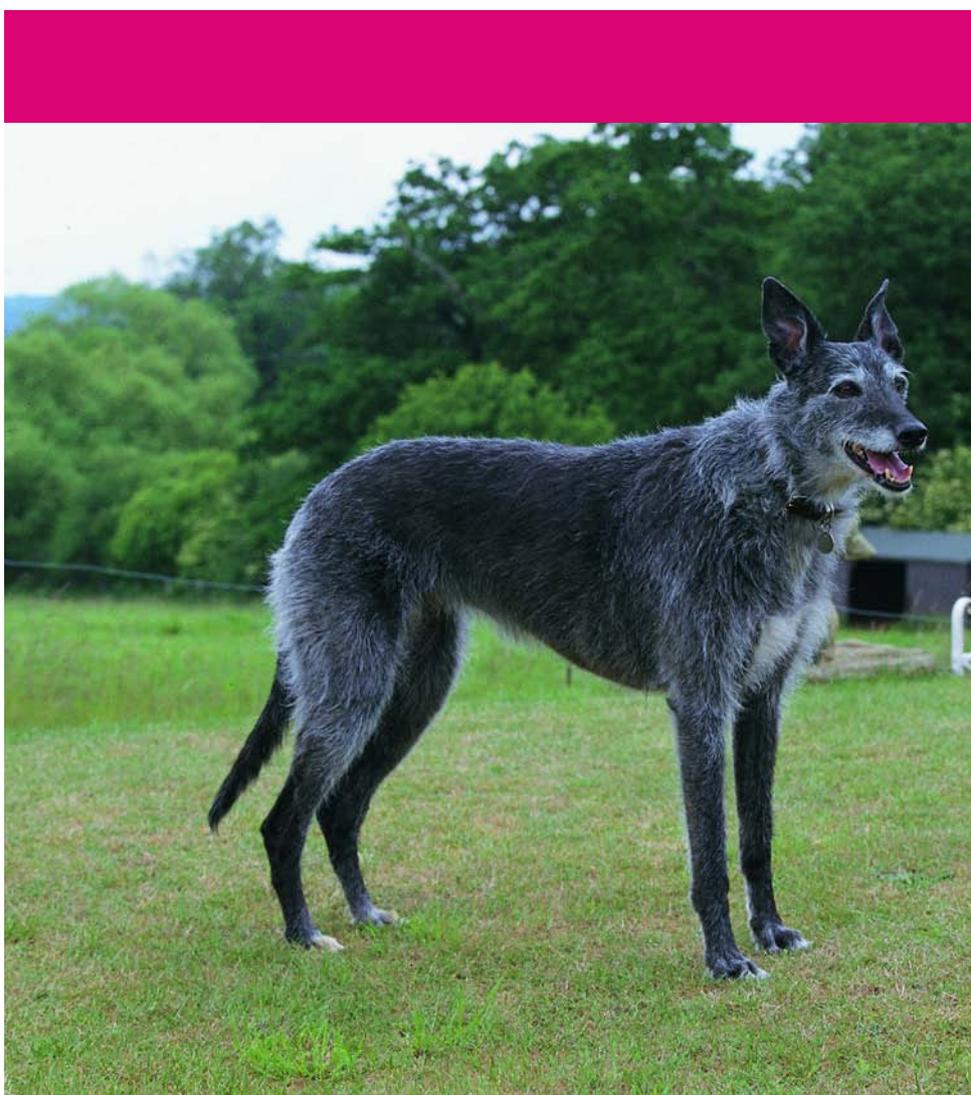
As with figure two (greyhounds), the local authorities are listed in ranked order according to the number of lurchers abandoned each year in relation to the total population (full population figures etc are listed in appendix three).

Fig three

Lurchers taken into local authority pounds in Wales

Local authority	Total no. of lurchers	Rank
Merthyr Tydfil	39	1
Wrexham	30	2
Pembrokeshire	24	3
Powys	17	4
Blaenau Gwent	9	5
Caerffili	20	6
Carmarthenshire	20	7
Bridgend	14	8
Gwynedd	12*	9*
Torfaen	9*	9*
Ceredigion	8*	9*
Neath Port Talbot	13	12
Newport	12	13
Cardiff	25	14
Denbighshire	6	15
Monmouthshire	5	16
Conwy	6	17
Vale of Glamorgan	6	18
Flintshire	7	19
Swansea	8	20
Anglesey/Ynys Mon	2	21
Rhondda Cynon Taff	1	22
Totals	293	

*Estimates for non-respondent local authorities.



Greyhound Rescue Wales aims to rescue cross-breeds (lurchers) as well as pure-bred greyhounds.



E A JANES/RSPCA PHOTOLIBRARY

The scale of the problem

- n More than twice as many lurchers as greyhounds are taken into local authority pounds in Wales.

Number of greyhounds going through local authority pounds	139
Number of lurchers going through local authority pounds	293

- n The abandonment of lurchers also constitutes a major animal welfare problem in Wales. GRW suspected there was a significant problem in relation to lurchers being abandoned once they were no longer useful for working (hunting). However, the number of lurchers being taken into pounds was much larger than expected. This does not diminish the seriousness of the numbers of greyhounds being abandoned, but it actually means that there is an even bigger problem in relation to lurchers.
- n There is a need for a dedicated Welsh lurcher rescue organisation. GRW takes in lurchers as well as greyhounds but many other greyhound rescue charities only accept pure-bred greyhounds. However, the sheer number of lurchers entering local authority pounds calls for a dedicated organisation to address the problem.

The location of the problem – five hotspots for abandoned lurchers

- n Merthyr Tydfil stands out as a hotspot with about three times as many lurchers per head of population being taken into the local pound as the next highest placed authority. Blaenau Gwent is also in the top five local authority areas for abandoned lurchers suggesting a major problem in the Heads of the Valleys area where ‘lamping’ (hunting rabbits at night with lurchers) is a well-established activity.
- n Wrexham is ranked second and obviously also has a serious problem. Given that Wrexham was ranked third for abandoned greyhounds (Flint, also in north-east Wales was ranked second), this indicates a major problem with the abandonment of both greyhounds and lurchers in the north-east Wales region.
- n Two rural local authority areas, Pembrokeshire and Powys, are ranked third and fourth indicating a major problem in rural areas where hunting with lurchers is also well established.

The financial cost

- n The lurchers taken into pounds in Wales will cost local authorities about £67,000.
- n Transposed to Britain as a whole this amounts to £1,350,000.
- n This cost falls to local authorities, largely because of the widespread abandonment of working lurchers once they are no longer able to hunt successfully.

Main conclusions

- 1) **The fate of former racing greyhounds constitutes a major animal welfare problem because of the large numbers that are discarded by the racing industry and the suffering that results. Although many dogs will die, local authorities, together with animal rescue charities and organisations, bear the cost of rescuing as many as possible of these dogs. Both should not be expected to cope with a problem of this scale created by unregulated commercial interests.**
 - n About 140 greyhounds are abandoned and collected by local authority pounds in Wales in a one-year period.
 - n Across Britain as a whole, it is likely that about 2,800 greyhounds are abandoned and taken in to local authority pounds.
 - n The number of greyhounds discarded without proper provision by the industry each year is likely to be several times these figures, a conservative estimate being 400 to 600 in Wales and 8,000 to 12,000 in Britain. This is because these figures do not include all the greyhounds meeting other unacceptable fates eg those that are abandoned and die without being found, euthanased by vets, and killed by owners.
- 2) **In Wales there are particularly high numbers of abandoned greyhounds in south-west Wales, in north-east Wales and in the south Wales valleys – this suggests a link between abandoned greyhounds and the proximity of an unregistered greyhound track.**
 - n The worst five areas for abandoned greyhounds are all close to unregistered tracks: Swansea and Neath Port Talbot (Swansea), Flintshire and Wrexham (Ellesmere Port), and Merthyr Tydfil (Ystrad Mynach and Bedwellte).
 - n There are reasons to be concerned that large numbers of greyhounds are also being shot once they retire in some parts of Wales.
- 3) **Local authorities bear the cost of abandoned greyhounds.**
 - n The greyhounds taken into pounds in Wales will cost local authorities about £32,000. Transposed to Britain as a whole this amounts to £600,000.
 - n These costs fall to local authorities because the racing industry, and in particular the independent sector, is failing to make proper provision for all greyhounds when they retire.
- 4) **The fate of former working lurchers also constitutes a major animal welfare problem.**
 - n Twice as many lurchers as greyhounds are taken into local authority pounds in Wales.
 - n There is a need for a dedicated Welsh Lurcher Rescue organisation to address this problem.
- 5) **In Wales there are particularly high numbers of abandoned lurchers in the heads of the valleys, in rural areas and in north-east Wales where hunting with lurchers is a well established activity.**
- 6) **Local authorities bear the cost of abandoned lurchers.**
 - n The lurchers taken into pounds in Wales will cost local authorities about £67,000. Transposed to Britain as a whole this amounts to £1,350,000. Many of these dogs will be working lurchers abandoned when they are no longer able to hunt successfully.





GREYHOUND RESCUE WALES



ANDREW FORSYTH/RSPCA PHOTOLIBRARY

The fate of former racing greyhounds and working lurchers constitutes a major animal welfare problem.

Recommendations

This report calls upon:

The National Assembly for Wales and the Department for Environment, Food and Rural Affairs (DEFRA)

- 1) To include the independent or unregistered greyhound racing sector within the scope of the forthcoming Animal Welfare Bill, or to apply appropriate measures through specifically designed legislation to promote the welfare of racing greyhounds and retired greyhounds from the independent sector.
- 2) Specifically to require that independent greyhound tracks obtain a licence to operate from their local authority and that the granting of such a licence be conditional to the track meeting specific requirements including:
 - n that the track satisfies the local authority that it is taking appropriate measures to enable proper provision to be made for greyhounds on retirement eg operating an adequate system of fundraising to meet the costs of rehoming greyhounds when they retire
 - n that regulations to prevent injury to dogs in force in the registered sector also apply to the independent sector
 - n that any kennels at independent greyhound tracks meet the standards applied to other commercial boarding kennels
 - n that an independent veterinary surgeon, appointed by the local authority in which the greyhound track is located, is present throughout the duration of the greyhound races, to ensure all dogs receive any necessary veterinary treatment and to prevent any undue suffering
 - n that a proper system (for example microchipping) is in place at the track to record ownership of greyhounds in order to allow abandoned or maltreated dogs to be traced to their most recent owner
 - n that tracks cooperate in placing appropriate sanctions on greyhound owners found to have failed to make proper provision for their dogs (eg abandonment) on retirement.

The independent greyhound racing industry

- 4) To take full responsibility for the welfare of greyhounds when they retire after racing on independent tracks. Specifically:
 - n that independent tracks put in place an adequate system of funding to pay for the rehoming costs of retired greyhounds, for example through introducing an additional levy on entrance fees to race meetings
 - n that independent tracks cooperate fully with statutory authorities and voluntary greyhound rescue organisations to prevent the abandonment and ill-treatment of greyhounds and to make proper provision for them on retirement.

Established greyhound rescue organisations

- 5) To extend their remit to rescue and rehome greyhound cross-breeds as well as pure-bred greyhounds if they do not already do so.

Any interested person or organisation in a position to help

- 6) To take steps to establish a dedicated lurcher rescue organisation in Wales.
- 7) To provide resources to enable further research to be carried out to investigate the numbers of greyhounds meeting fates two, three, four, five and six (abandoned and die before being found, euthanased, killed by owners, abandoned and taken in by members of the public or animal welfare organisations).

Anyone who cares about the fate of greyhounds and lurchers

- 8) To consider adopting a former racing greyhound or lurcher and to become involved with a greyhound and lurcher rescue organisation.
- 9) To publicly express support for these recommendations.



Anyone who cares about the fate of greyhounds and lurchers should consider adopting one.

ANDREW FORSYTH/RSPCA PHOTOLIBRARY

Appendix one – survey questions

Please complete the following questions. If you are unable to complete a question for any reason please answer as many as you can.

1) Name of local authority _____

2) Name and contact details of local authority officer dealing with this questionnaire _____

3) Name and address of local authority pound and/or other kennels used by the local authority _____

4) Name and position of person completing this questionnaire (if different to question two above) _____

5) Date on which the questionnaire is being completed _____

6) What is the last complete 12-month period for which you have a record of dogs entering and leaving you local authority pound kennels?
Start date _____ End date _____

7) During this 12-month period how many greyhounds in total came into your local authority pound kennels? Total number _____

8) During this 12-month period how many greyhound cross-breeds (lurchers) in total came into your local authority pound kennels? Total number _____

9) How many greyhounds (if any) are in your local authority pound kennels today? Total number _____

10) Please give the following information for each greyhound in your local authority pound kennels today: _____

NB – we appreciate that some pounds will keep dogs at their own expense for longer than the minimum number of days required by the local authority. The "due out" date in questions 10 & 11 may therefore be earlier than today's date.

	Male/female	Date in	Date due out
GH 1	_____	_____	_____
GH 2	_____	_____	_____
GH 3	_____	_____	_____
GH 4	_____	_____	_____
GH 5	_____	_____	_____
GH 6	_____	_____	_____

Continue if necessary

11) How many greyhound cross-breeds (lurchers) if any, are in your local authority pound kennels today? _____

12) Please give the following information for each greyhound in your local authority pound kennels today:

	Male/female	Date in	Date due out
GHX 1	_____	_____	_____
GHX 2	_____	_____	_____
GHX 3	_____	_____	_____
GHX 4	_____	_____	_____
GHX 5	_____	_____	_____
GHX 6	_____	_____	_____

Continue if necessary

Appendix two – abandoned greyhounds in relation to population

Figure one lists the Welsh local authorities and the total number of greyhounds abandoned in each area over a 12-month period. The population of each local authority area is shown and the local authorities are ranked according to the number of greyhounds taken into local authority pounds in relation to the total population. The local authority with the highest abandoned greyhound to population ratio is therefore listed first.

Fig one: Greyhounds taken into local authority pounds in Wales (respondent authorities only)

Rank	Local authority	Population	No of greyhounds	Ratio: pop' to gh
1	Swansea	223,309	32	6,978
2	Flintshire	148,594	12	12,380
3	Wrexham	128,476	10	12,848
4	Merthyr Tydfil	55,981	4	13,995
5	Neath Port Talbot	134,468	9	14,940
6	Monmouthshire	84,885	5	16,977
10	Powys	126,354	6	21,059
11	Denbighshire	93,065	4	23,266
12	Carmarthenshire	172,842	7	24,692
13	Conwy	109,596	4	27,399
14	Pembrokeshire	114,131	4	28,532
15	Bridgend	128,645	4	32,161
16	Anglesey/Ynys Mon	66,829	2	33,414
17	Caerffili	169,519	5	33,904
18	Cardiff	305,553	9	33,950
19	Rhondda Cynon Taff	231,146	6	38,524
20	Blaenau Gwent	70,064	1	70,064
21	Vale of Glamorgan	119,292	1	119,292
22	Newport	128,645	0	---
Totals		2,611,394	125	20,891

Figure two lists the three non-respondent local authorities and estimates the numbers of greyhounds taken in to the local authority pounds in each case using the average figure of one greyhound per 20,891 population from the respondent local authorities.

Fig two: Estimated number of greyhounds taken into local authority pounds in non-respondent local authorities in Wales.

Rank	Local authority	Population	Estimated number of greyhounds	Ratio pop' to gh
=7	Ceredigion	74,941	4*	20,891
=7	Gwynedd	116,843	6*	20,891
=7	Torfaen	90,949	4*	20,891
Totals:		282,733	14	20,891

*Calculation for non-respondent local authorities based on one greyhound abandoned for an average of 20,891 people.

Appendix three – abandoned lurchers in relation to population

Figure three lists the Welsh local authorities and the total number of lurchers abandoned in each area over a 12-month period. The population of each local authority area is shown and the local authorities are ranked according to the number of lurchers taken into local authority pounds in relation to the total population. The local authority with the highest abandoned lurcher to population ratio is therefore listed first.

Fig three: Lurchers taken into local authority pounds in Wales (respondent authorities only)

Rank	Local authority	Population	No of lurchers	Ratio: pop' to lchr
1	Merthyr Tydfil	55,981	39	1,435
2	Wrexham	128,476	30	4,282
3	Pembrokeshire	114,131	24	4,755
4	Powys	126,354	17	7,433
5	Blaenau Gwent	70,064	9	7,785
6	Caerffili	169,519	20	8,476
7	Carmarthenshire	172,842	20	8,642
8	Bridgend	128,645	14	9,189
12	Neath Port Talbot	134,468	13	10,344
13	Newport	128,645	12	10,720
14	Cardiff	305,553	25	12,222
15	Denbighshire	93,065	6	15,511
16	Monmouthshire	84,885	5	16,977
17	Conwy	109,596	6	18,266
18	Vale of Glamorgan	119,292	6	19,882
19	Flintshire	148,594	7	21,227
20	Swansea	223,309	8	27,914
21	Anglesey/Ynys Mon	66,829	2	33,415
22	Rhondda Cynon Taff	231,146	1	231,146
Totals		2611,394	264	9,892

Figure four lists the three non-respondent local authorities and estimates the numbers of lurchers taken in to the local authority pounds in each case using the average figure of one lurcher per 9,892 population from the respondent local authorities.

Fig four: Estimated number of lurchers taken into local authority pounds in non respondent local authorities in Wales.

Rank	Local authority	Population	Estimated number of lurchers	Ratio pop' to lurcher
=9	Ceredigion	74,941	8*	9,892
=9	Gwynedd	116,843	12*	9,892
=9	Torfaen	90,949	9*	98,992
Totals:		282,733	29	9,892

* Calculation for non-respondent local authorities based on 1 lurcher abandoned for an average of 9,892 people.

References

The context of the study

- 1) See for example Greyhounds UK Monitoring Survey 1999. This was a survey of greyhounds taken into rescue centres in the UK between August 1998 and July 1999. 177 rescue centres and 52 dog wardens (out of 432 local authorities in the UK) took part. Participants reported a total of 1,546 greyhounds taken into their care, but the survey concluded that because not all organisations that take greyhounds participated, these data underestimated the true figures.
- 2) www.thedogs.co.uk (British Greyhound Racing Board website).
- 3) www.pelawgrange.co.uk/trackguide (a guide to independent tracks in England, Scotland and Wales).
- 4) Greyhounds UK, The Greyhound Business – Fat Cats and Dead Dogs – Response to UK government consultation on animal welfare bill, 2001.
- 5) www.connectotel.com/greyhoundaction
- 6) Greyhound Rescue Wales, Briefing Notes, Greyhound Racing and Greyhound Rescue in Wales, 2000.

Findings – greyhounds

- 1) National Canine Defence League/National Dog Wardens Association, Stray Dogs Survey, 2002.

A Better Bet for Greyhounds



A Submission to the Welsh Assembly Government in view of proposals to introduce Regulations and a Code of Practice for greyhounds racing in Wales



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Chapter 1

Introduction and historical context of the Forum for Wales

All Party Groups (otherwise known as cross-party groups) are not part of the legislative process but provide a forum for all political parties and the relevant interest groups to hold regular meetings to debate issues. The All Party Group for Animal Welfare was formed in 2000 and, as one of the first All-Party groups within the National Assembly for Wales, it has raised the profile of this type of forum. As the Group is for Assembly Members, interest groups – numbering over forty – retain an associate role and don't hold office or vote.

The fate of greyhounds' post-racing career was the topic at the inaugural meeting of the National Assembly for Wales in 2000. At that meeting it was decided that a survey should be taken of all local authorities in Wales to assess the number of stray greyhounds being picked up over a one-year period.

Once the survey was completed and returned by 19 local authorities in Wales, APGAW produced a report¹ which detailed the six unacceptable fates for greyhounds post-racing career, including being dumped or abandoned for a local authority to pick up. Then in May 2004 a greyhound, 'Last Hope', was found on Fochriw mountain, Caerphilly, with its ears (and therefore the tattoo identification) cut off and it had been shot in the head. It was still alive, but unfortunately the animal had to be put to sleep a short time later by a vet due to its horrific injuries. The vet who examined the dog concluded that the shot to the head could have had occurred days earlier and the dog had remained on the mountain alive and exposed to the elements for some time. An investigation was immediately commenced by the RSPCA with the invaluable assistance of Greyhound Rescue Wales and the Police. As a result of the shocking nature of this case, the joint working of animal welfare organisations and the publicity it received, the perpetrators were identified by information provided by the racing community. The case went to court and Andrew Gough who had mutilated the dog was convicted under the 1911 Protection of Animals Act and was sentenced to 6 months imprisonment as well as being banned from keeping animals for life. Immediately following this RSPCA prosecution and on the back of a new emphasis on closer working to prevent this from happening again, the Greyhound Forum for Wales was officially formed. Lorraine Barrett AM, as Chair of APGAW, established the Forum, which she also chairs, the other members are listed on the next page. Following the outcome of the Andrew Gough case the Forum unanimously agreed that even one dog killed in this way was one too many. The Forum also agreed on approximately figure of 100 dogs a year meeting a similar fate to 'Last Hope' or being killed by their owner.

Since its inception the Forum has been working on a variety of projects to improve animal welfare in racing. Perhaps one of the most important proposals is for a reliable identification method, which would enable each dog to be immediately traced to its owner. All tracks have signed up to this proposal and agreed that no dog should be allowed to race without this level of traceability through, and post, its racing career. The Forum has worked to develop this idea and the associated forms, which can be found in Annex A. Dogs Trust have a fund of approximately £14,000 reserved for the data entry and to develop the database needed to support this scheme. This programme has not been implemented as yet as the Forum would now like to see the scheme a mandatory part of any regulation and/or code of practice under the Animal Welfare Act.

The Forum has also produced a poster and a leaflet¹ to highlight how greyhounds make good pets. These were widely publicised by all tracks, which is a great example of the Forum's co-operative work. There has also been discussion in the group of turning our future focus to developing a guide on best practice for re-homing a greyhound.

Finally the Forum has been developing the details it wishes to see form part of any regulations and code of practice. These are set out in Chapter 2 of this document.

¹ Copies at www.apgaw.org.uk/11668.asp

Forum membership

Chair		Lorraine Barrett AM
Tracks		
Forum member & contact details	Track location	Additional information
<p>Lynne Short 17 Harlech Drive Castle Park Merthyr Tydfil CF84 1JU 01685 370858, 07970 019418 lynnshort1959@yahoo.co.uk</p> 	<p>Swansea Greyhound Stadium Ystrad Road Fforestfach Swansea SA5 4NE 01792 579368</p>	<ul style="list-style-type: none"> • This track is currently situated on land leased from the local authority • Kennels on site • Clubhouse on site
<p>Malcolm Tams Vale View Upper Trelyn Blackwood Caerphilly NP12 1PD 01443 821373, 07939 259191 mtamsy@aol.com</p> 	<p>Valley Greyhound Track Tredomen Athletic Club Ystrad Mynach Caerphilly</p>	<ul style="list-style-type: none"> • The track is leased from the land owners the Tredomen Social Club • No kennels on site • Clubhouse nearby run by the social club
<p>Vera Rees The Bungalow Bedwellte Greyhound Track Bedwellte Nr Blackwood Caerphilly NP12 0BD 01433 831072</p>	<p>Bedwellte Greyhound Track Bedwellte Nr Blackwood Caerphilly NP12 0BD</p>	<ul style="list-style-type: none"> • Currently closed and up for sale • Track was run by owner who lived on site • No kennels or clubhouse
Welfare organisations		
<p>Claire Lawson Public Affairs Manager RSPCA Cymru (APGAW & Greyhound Forum Secretariats)</p>	<p>RSPCA Cymru PO Box 27 Cardiff CF15 8WZ Tel 0870 753 8906 or 07976 854166 Clawson@rspca.org.uk</p>	
<p>Alain Thomas Founder & Public Relations Officer Greyhound Rescue Wales</p>	<p>Lawnswood Sandy Lane Parkmill Swansea SA3 2EW Tel: 01792 371413 or 07971 074922 alain.thomas@btinternet.com</p>	
<p>Sian Edwards Welsh Campaigns Manager Dogs Trust</p>	<p>Dogs Trust Rehoming Centre Court Colman Farm Court Colman Pen-y-fai Bridgend Mid Glamorgan CF31 4NG Tel 01656 725345 or 07932 114534 sian.edwards@dogstrust.org.uk</p>	

A Better Bet for Greyhounds



Facts & figures of greyhound racing in Wales

by agreement of members of the Greyhound Forum for Wales

Numbers of dogs racing regularly in Wales	Between 300 & 400
Numbers of race meetings a week	4 per week across 2 tracks, 7 races per meeting with 5 or 6 dogs in each race
Estimation from this Forum on number of dogs 'missing' every year	The Forum has agreed that this could be 100
Number of dogs abandoned and entering local authority pounds every year	The APGAW survey www.apgawwales.org found 139 greyhounds abandoned in Wales in one year but contributing factors may be lowering this

Regulations for greyhounds in Wales



Animal Welfare Act – Wales

The Animal Welfare Act² 2006, brought into force in England and Wales in 2007, makes owners and keepers of domestic and companion animals responsible for ensuring that the welfare needs of their animals are met. This places a duty of care on the owner/keeper and is enshrined in the five freedoms.

Animals' needs (the five freedoms) include:

- A need for a suitable environment
- A need for a suitable diet
- A need to be able to exhibit normal behaviour patterns
- Any need to be housed with, or apart from, other animals, and
- A need to be protected from pain, suffering, injury and disease.

The Animal Welfare Act also empowers the National Assembly for Wales to make legislation both in the form of Regulations and Codes of Practice. The Forum welcomes the published plans for such measures with regards Greyhound racing and welfare in 2007/8.

This paper sets out the situation as it is at present and the arguments for proper regulation, as viewed by the Forum.

Chapter (2) is an outline of what is needed from the Forum's perspective. Except with regards the issue of mandatory veterinary presence at race meetings, all proposals contained within this document have been unanimously agreed by the Greyhound Forum. Some of these may form part of a regulation, others perhaps would be better suited to a Code of Practice.

Annex A is a detailed description, including the proposed forms, for a full ID programme for all racing Greyhounds linked to the owner through an Owner/Trainer Licence.

Photo: Chris Montana



Submission to the Welsh Assembly Government

Background

In recent years there have been three independent tracks operating in Wales, however Bedwellte track (in Caerphilly County Borough) is currently closed and up for sale. 'Independent' within Greyhound Racing means those tracks that are not governed by the National Greyhound Racing Club (NGRC). They are also sometimes referred to as 'flapping tracks'. The NGRC is a self-regulating system and is mostly centred on governing the fairness and rules of racing, but it does recognise the importance of welfare and has, in recent years, attempted to improve standards. With no NGRC or other forms of regulation, the tracks in Wales have operated as private businesses and have been subject to Gaming Licence requirements only.

Why a special case for Wales?

The Forum is of the opinion that those concerned with racing and its proposed regulation in England have largely ignored the issues that the independent racing sector presents. In his oral evidence to the EFRA committee scrutinising the Draft Animal Welfare Bill, Lord Lipsey, Chairman of the British Greyhound Racing Board, said "...But that does bring me back to the question of independents which was raised and which we did not tackle directly. My own view, if you look at the nature of most of these independent tracks is that they are disappearing at a rate of knots. They are mostly man and boy and, as time goes by, they go out of business at a rate of knots, as I say. In my view, there are only two courses for them: go out of business or join the NGRC with all the regulation that that implies."³ Whilst it is possible that new regulations could force independents out of business, this is not true of all. In addition, as NGRC is non-governmental, it is our opinion that independent tracks should not be forced to join. This, by definition, leaves an independent sector in need of regulation. Many feel this is important to the industry as it gives greyhounds a longer career as many start in NGRC tracks but finish their career in the independent sector where owners are more likely to keep their greyhound as a pet after racing. The animal is also more likely to be housed in the family home and perhaps have a less stressing race schedule.

³ <http://www.publications.parliament.uk/pa/cm200405/cmselect/cmenvfru/52/52ii.pdf> [EV232]



Proposals for England?

The future of any Regulation or Code of Practice in England for Greyhounds is as yet undetermined. There have been a number of reasons for this. In particular, the media coverage of the Co Durham case, where it is alleged an individual killed 10,000 greyhounds (at the owner's request) when they had no further use, has led to two inquiries. The first was by the Associate Parliamentary Group for Animal Welfare who investigated the general welfare issues faced by greyhounds racing in England, the report can be found at www.apgaw.org. The second inquiry is on-going and is being conducted by Lord Donoughue on behalf of the industry. Many welfare organisations believe the Co Durham case vindicates their long held view that the NGRC should not be ensuring welfare standards and indeed that self-regulation as a principle is inherently flawed.

APGAW Wales has participated in the debate in England, in both the UK Greyhound Forum⁴ and the APGAW Westminster inquiry, which led to both written and verbal evidence⁵ in the latter case. Both APGAW Wales and the Greyhound Forum for Wales would be happy to share any information with our English counterparts. In particular the Forum for Wales is mapping greyhound fates by surveying vets and animal rescue organisations and, with the Welsh Assembly Government's help, re-surveying the local authorities in the near future.

Wales only has independent tracks. Any policy, regulation or subsequent code of practice must reflect that. There is no political will or public campaign to close greyhound racing down in Wales and it is also not a recommendation of this group. However regulation is desperately needed to ensure the welfare of the greyhounds racing in Wales.

Of course if welfare standards were higher in England as a result of any regulation they introduce and nothing were developed in Wales, we might expect a number of tracks

⁴ Contact the Dogs Trust (UK Forum secretariat) on 0207 837 0006

⁵ www.apgaw.wales.org.uk and www.apgaw.org

A Better Bet for Greyhounds



moving to Wales. There are currently approximately 9 independent tracks in England (there are also two tracks in Scotland, but like Wales, these come under the jurisdiction of the devolved Government). It is key that neither England nor Wales through design, or negligence, allow for the exportation or importation of cruelty following the introduction of Regulations and/or Codes.

Another key reason for regulation in Wales is that as NGRC has no presence in Wales currently, there would be no industry standard and no umbrella body requiring the Welsh tracks to comply. On the other hand and in any case, this Forum is not prepared to endorse the NGRC as a regulating body for racing in Wales. On closer examination NGRC rules governing welfare cannot be considered nearly sufficient nor are they rigorously enforced.

The reason for this is that welfare rules within NGRC racing are not given a high enough status, instead they are incorporated within other rules, which are much more to do with racing and fairness – the prime reason the NGRC was created. NGRC stipendiary stewards are charged with enforcing all the rules of racing and welfare, which has historically meant that racing has taken precedent.

NGRC Rule 18⁶ (see below) is a prime example of a rule that is often ignored and certainly not widely enforced.

There have been some examples of this rule being enforced recently, however there are only a few examples of sanctions actually being imposed. For example, the Forum for Wales is interested to know the outcome of the inquiries following the Co Durham case. The Forum believes that independent regulation of greyhound racing is the best option to assure that proper welfare standards are established imposed and maintained.

Photo: Chris Montana



⁶ http://www.ngrc.org.uk/rule_book.asp?rule=34

Rule 18 Responsibility of Owner

- (i) The NGRC Stewards shall hold the last registered Owner to be responsible for the welfare of a Greyhound and also for making acceptable arrangements for his/her retired greyhound as follows:
 - a) the Greyhound be retained as a pet, or
 - b) the Greyhound be boarded at a Licensed Kennel, or
 - c) the Greyhound be boarded at a Kennel licensed by the local authority, or
 - d) the Greyhound be found a home through the Retired Greyhound Trust, or
 - e) the Greyhound be sold or found a home, responsibly, or if it is necessary for the Greyhound to be euthanased either on humane grounds or because none of the above options are available, the Owner ensuring, subject to rule 58, that such euthanasia is carried out by a registered veterinary surgeon.
- (ii) A registered owner shall inform the NGRC if there is any change in ownership of a registered Greyhound and whether or not it is intended to enter in any Trial or Race again (see Rule 20). A registered Owner shall also report, or arrange for a licensed Trainer to report on his/her behalf, the retirement of a Greyhound which it is not intended to enter it (sic) in any Trial or Race again, or any subsequent 'Comeback' from a previously-reported retirement, to the Racing Manager of any NGRC Licensed Racecourse and shall be given and retain a receipt in the form of a copy of a Greyhound Detail Report prepared under Rules 195(i) and 194(vii).
- (iii) Failure to give notification under Rule 18(i) within 28 Days of the Change of Ownership shall result in a penalty, being levied and may result in the NGRC Stewards prohibiting an Owner from registering Greyhounds unless the Owner is able to satisfy the Stewards that any future retirement of a Greyhound in his/her charge will be strictly in accordance with Rule 18.

Submission to the Welsh Assembly Government

NGRC in Wales?

There are no NGRC tracks currently in Wales; however an existing independent track could convert or a new one could be built. Both situations are currently unlikely at this particular moment in time. Certainly the independent tracks currently operating in Wales would have to invest large sums of money to meet the entry standards required by NGRC. Both tracks are currently on leased land which may be determined as undesirable to the NGRC.

Thus the Forum feels strongly that it would be inappropriate if not impossible to appoint the NGRC as an enforcer in Wales at this stage. Without an NGRC presence in Wales it is crucial that the Welsh Assembly Government establish clear regulations for racing to protect these dogs in Wales and this Forum is happy to take a supportive role.



Further considerations

The Greyhound Forum for Wales recognises there are a number of issues that are not addressed within this document, however they remain important and the Forum would be happy to participate in finding solutions. These issues are:

a) Register of Breeders

There is a great deal of concern about the number of puppies produced each year in the UK and Ireland and the lack of traceability for these animals. A register of breeders would go some way to addressing the problem. Although the Forum have not discussed a policy in this area as yet, there is a suggestion that those intending to trial/race a puppy must ensure it is registered on a puppy register as soon as possible after birth. In addition identification (microchip) must be completed by 3 months of age.

b) Cross border issues

The Greyhound Forum for Wales is keen that any Regulations/Code of Practice do not allow for the import or export of cruelty. However different rules in England and Wales do not necessarily have to create an imbalance but can instead complement each other. We are concerned that owner/trainers living in Wales but racing on NGRC and/or independent tracks in England be subject to the same rules as all other owner/trainers in Wales. However we would also not expect owner/trainers residing in England to be subject to lower standards should they wish to race in Wales.



Chapter 2

Proposals for measures to be included within Regulations & a Code of Practice

The following chapter is the final version of a document that Forum members have worked on for many months with a view to advising the Welsh Assembly Government on the issues surrounding the welfare of racing greyhounds in Wales. A decision was made not to separate recommendations into Regulation and Code, but to present the information in a format that is only concerned with the needs of the Greyhound.

We have attempted, where possible, to adopt models of legislation that already exists for our policy areas. The Forum has debated the need for regulation and has agreed that this is possible, given due consideration, without causing an excess of red tape, if a system similar to what we have proposed is adopted.

Acknowledgements

These regulations draw extensively on two documents:

- The 'Guide to Best Practice' accompanying the 'Charter for the Racing Greyhound' produced by the UK Greyhound Forum.
- NGRC Rules of Racing.

In the case of the NGRC Rules of Racing, these regulations have sought to incorporate, and in some cases, adapt, the rules that are relevant to welfare.

These regulations have also incorporated elements of the 'Guide to Best Practice' where these enhanced welfare or provided supplementary material to the NGRC rules.

Finally, there is also some new material designed specifically to respond to the Welsh context and to further enhance welfare.

In this way it is hoped that these regulations offer a useful starting point towards the achievement of proper regulation of greyhound racing in Wales.

Policy Context

A distinctive element in the regulations is that they take a partnership approach to service delivery. There will be two regulatory roles. The licensing role will be fulfilled by a statutory body (a local authority) and a complementary monitoring role will be fulfilled through the Greyhound Forum for Wales that brings together the voluntary sector (welfare organisations), and industry representatives (the Welsh Tracks). The relationship between the two bodies will obviously need to be formalised. However, the principle, of creating synergy to deliver improved services through partnerships between different stakeholders is in line with an important and developing strand of WAG policy. This may be found for example in public service policy (see for example Making the Connections – delivering better services for Wales, WAG 2004) and in community development policy (as for example in the 'three thirds principle' used by the Communities First Programme).



Photo: Greyhound Rescue Wales



1. Framework

1.1 Licensing authorities

The Local Authority in whose area the activity takes place to be the licensing authority.

The Local Authority has the power to issue, refuse to issue, suspend or revoke all licences mentioned in this document.

The personnel appointed by the licensing authority to implement these regulations must be free of any vested interest (i.e. they must not be a member of a greyhound welfare organisation nor be engaged in any aspect of greyhound racing).

In determining whether to issue, refuse to issue, suspend or revoke the above licenses and passport the relevant authorities will be bound by the explicit provisions of these regulations.

1.2 Licences

a) Track Licence

All Greyhound Stadiums in Wales must have an up to date Track Licence issued by the licensing authority. That licence will be awarded following an initial inspection. Additional risk-based inspections, both planned and spot checks, may be carried out by the licensing authority as they see fit.

The licensing authority will only renew the Track Licence if it is satisfied that the Track has met all the conditions.

There will be a fee for the licence set by the licensing authority (our suggestion is £100 per year – the fee to go towards costs incurred by the licensing authority).

b) Kennel Licence

Any premises where five or more racing greyhounds are kept must have a current kennel licence and take into account the accompanying 'Guidelines for Good Practice (Annex B)'. Retired, i.e. pet greyhounds will not be included in this figure.

This licence will be awarded following a successful initial inspection. Additional ad hoc inspections may be carried out by the licensing authority as they see fit.

The licensing authority will only renew the Kennel Licence if it is satisfied that the owner has met all the conditions.

There will be a fee for the licence set by the licensing authority (suggest £20 for capacity of 5 dogs then £5 per extra dog capacity per year the fee to go towards costs incurred by the licensing authority).

c) Owner/Trainer Registration

The term owner and/or trainer is used to denote the legal owner of the greyhound who is responsible for the welfare of the dog under these regulations.

All Owners and/or Trainers of greyhounds racing at Welsh Tracks Wales must have an Owner/Trainer's License.

The licence must be renewed every five years.

All greyhounds owned and/or raced must be listed on the licence.

The licence must be updated every time the ownership of a greyhound changes and in the event of a greyhound's physical appearance changing (e.g. amputation of a toe).

There will be a fee for issuing or making changes to the Owner/Trainer's licence details (suggest £5 – the fee to go towards costs of maintaining the database)

d) Transport regulations and good practice guidelines

Anyone transporting racing greyhounds to or from races, trials or sales in Wales must abide by the regulations in section 5 of this document and take into account the accompanying guidelines for good practice (Annex C).

It is the responsibility of the owner/trainer of a greyhound to ensure that drivers or other people in charge of a greyhound in transit or in a stationary vehicle adhere to the regulations and guidelines.

1.3. Conditions

The conditions which must be met in order for any of the above to be issued are set out in these regulations.

1.4 Inspection and monitoring

a) Authorised Inspectors

The appropriate Minister to establish a list of persons authorised to undertake inspections under the regulation 'inspectors'. (This is akin to the model for Zoo Inspectors). No other person to be authorised to inspect. Inspectors to prove their competence either as appropriately experienced veterinary surgeons, experienced owners, trainers, representatives or welfare organisations dealing routinely with racing greyhounds. The Wales Greyhound forum to be consulted prior to the approval of any persons nominated for the role.

b) Duties of inspectors

The inspectors will monitor the operation of the Regulation / Code of practice in Wales through:

Inspecting each greyhound track once every year or more frequently if there are welfare concerns.

Inspecting all greyhound kennels in Wales licensed under these regulations once every year, or more frequently if there are welfare concerns.

Inspectors may inspect vehicles used for the transport of greyhounds when possible (for example while carrying out as kennel inspection if vehicles are parked at the same premises), as deemed necessary (for example if there are welfare concerns). Inspectors may make inspections as necessary to verify that the physical location of greyhounds is in accordance with the information held on the database and that their well-being is in accordance with welfare standards.

1.5 Welfare monitoring

a) Nominated Track Welfare Representative

The Greyhound Forum for Wales will approve Welfare Representatives (nominated by each track) and oversee their role.

b) Role of Nominated Track Welfare Representative

Track Welfare representatives nominated by each track will act as a first point of contact for welfare issues at the track.

In addition, all Track Welfare Representatives will be responsible for monitoring the database of owner/trainers and greyhounds in order to ascertain the physical whereabouts of greyhounds and to ensure that regulations are being followed.

The licensing authority, track managers, and owner/trainers will co-operate with Welfare Representatives and allow them access to all relevant databases and other data.

1.6 Greyhound Forum for Wales

a) Structure

Should future regulations/Code of Practice enshrine the Greyhound Forum for Wales' role, membership may need to be addressed and underwritten by Government. We would suggest further members from within Local Authorities and/or enforcement.

Each track will be entitled to appoint a representative to the Forum

Each greyhound-interested animal welfare group (Dogs Trust, Greyhound Rescue Wales & RSPCA) in Wales, will be entitled to appoint a representative to the Forum.

The Forum will have an independent Chair. This is currently the Chair of APGAW (All Party Group for Animal Welfare, in the National Assembly for Wales).

The Forum will meet a minimum of twice a year.

RSPCA currently provide the secretariat for APGAW Wales and the Greyhound Forum for Wales and may consider continuing this service.

b) Complementary responsibilities

The Forum will retain complementary database responsibilities for monitoring the ID & trace-ability schemes

Each year the Forum will nominate a minimum of 2 people (50% must be from the welfare organisations) to take responsibility for monitoring the database. These are additional and separate personnel from the tracks welfare reps. In this case their only responsibility is to monitor the database centrally. These monitoring reps will report to the Forum as demanded by the Forum. The Forum may make recommendations on the basis of such reports; to the Licensing Authority, or to Inspectors to assist and guide the Inspectors in fulfilling their duties for example under 1.4b above.

It may be appropriate for the Minister to confirm appointments to the Forum and the monitoring reps.

1.7 Penalties

The Local Authority will impose penalties upon greyhound owners, or trainers or track managers if it is satisfied that any regulations relating to the track licence or the kennel licence, or the transport regulations have been breached.

The Greyhound Forum for Wales may notify the licensing authority if, as a result of its monitoring activities, it believes that the regulations or code of conduct have been breached in particular with regard to the maintaining of accurate records of ownership and transfer of ownership of greyhounds.

The Greyhound Forum for Wales will be consulted by the Local Authority, to give evidence before the Local Authority imposes penalties upon greyhound owners, or trainers or track managers if the Local Authority is satisfied that any regulations relating to the owner/trainers licence or the transfer of ownership requirements have been breached.

Such penalties will include:

- Issuing a written warning
- Financial penalty (to be determined)
- Suspension of a licence for a period of time
- Permanently revoking a licence
- Banning a person from attending a greyhound track.

If an owner/trainer breaches any of the regulations below the Local Authority will be bound to temporarily suspend or permanently revoke the Owner/Trainers licence, depending on the circumstances in each case. In the event of repeated breaches of any of these regulations the Local Authority will be bound to permanently revoke the owner/trainers licence:

4.1 (Owner/Trainer must have up to date licence)

4.2 (Owner/Trainer must comply with veterinary advice)

4.3 (Owner/Trainer must co-operate with inspectors)

4.4 (Greyhounds must be micro-chipped and owner/trainer must transfer registration)

4.5 (Owner/Trainer must record transfer of ownership if greyhound sold or re-homed)

4.6 (Owner/Trainer responsible for welfare of greyhound and for making acceptable arrangements on retirement).

The Local authority will also be bound to permanently revoke a licence if the holder is found to have caused unnecessary suffering to a greyhound or to have failed in their duty of care to a greyhound.

1.8 Appeals

The Local Authority may at any time suspend, revoke or refuse to renew a licence; no such suspension or refusal to be unreasonably withheld. Any person aggrieved by such action may appeal within 30 days to a Magistrates Court and the action to be suspended until the appeal has been determined.

2. Track Licence

The Forum formally recommends a nominal charge of £100 per annum for the track licence payable to the licensing body – the Local Authority.

A track licence to hold greyhound races in Wales will be granted if the following conditions are met:

2.1 General condition of the track

The track will be well maintained so that nothing such as sharp edges, damaged or rough surfaces or loose fittings shall present any risk of injury to the greyhounds.

2.2 Measurements

The minimum circumference of the track, measured one metre from the inside fence, should be no less than 400 metres. Measurements are only acceptable when made by a qualified surveyor. The track width should be no less than 5.5 metres on the straights or 7.5 metres round the bends. The bends should be slightly banked from the inside to the outside – recommended rake 45cm. The curve of the bends should be as gradual as the width of the area between the two straights allows and must be able to accommodate the galloping action of a greyhound. An ideal radius for the bends is approximately 36 metres.

2.3 Gradient

The track shall be level with no significant gradient. A significant gradient is one that increases the risk of injury to racing greyhounds.

2.4 Surfaces

An appropriate surface such as sand must be used as a track surface on bends. Grass or sand may be used on straights. The sand should be laid to a minimum recommended depth of 175mm and, when bedded down, should provide a compact and safe surface giving good purchase. Good watering facilities and good drainage are essential. Sand type is most important. It must be free of all foreign matter – stones, flints, gravel etc and able to absorb the right amount of water. When sand is used as a surface this will be mechanically or manually smoothed after every three races.

2.5 Starting traps

Starting traps, both level and handicap, must be to a design and standard similar to NGRC standards and with provision for automatic starting. Where the traps are permanently fixed, there must be ample rear access so that it is easy to place the greyhounds in their compartments.

2.6 Muzzles

All dogs will wear suitable muzzles when racing, or trialling when there is more than one dog racing, when kennelled or in transport with another dog.

2.7 Veterinary presence at tracks

The Greyhound Forum for Wales remains unanimous in their view that veterinary presence at tracks is a positive step forward for both welfare and practical reasons. However both track representatives reserve the opinion that mandatory veterinary presence is prohibitively costly and will jeopardise business long term. Whilst the welfare reps of the Forum remain convinced that legislation is essential to ensure a veterinary presence at all race meetings, the tracks would ask that a trial period, or phase-in time period be considered if they can demonstrate that there is a suitable existing contract with an on-call vet within reasonable travelling distance to the track.

A qualified veterinary surgeon must be present at all greyhound races and at trials whenever there is more than one greyhound running on the track at the same time.

An 'on call arrangement' is not acceptable.

Any costs associated with assuring a veterinary presence will be met by the track.

2.8 The role of the veterinary surgeon

The veterinary surgeon will attend race meetings to attend to any dogs suffering injury or that he/she deems to be in need of veterinary attention.

The final decision on whether an individual dog is fit to race will reside with the veterinary surgeon.

The veterinary surgeon will keep a record of all injuries to greyhounds at the track. This will include details of the nature of the injury, where it occurred on the track, the time it occurred and any circumstances which in his/her opinion may have contributed to the injury. The record will contain details of the greyhound and its owner/trainer.

The veterinary surgeon will keep a record of any other treatment he/she administers to greyhounds at the track, the reason for the treatment and the details of the greyhound and the owner/trainer.

The veterinary surgeon will be empowered to stop the race meeting at any time if in his professional opinion continuing with the meeting would lead to an unacceptably high risk of injury for the dogs.

He/she will be empowered to inspect owner/trainers licences.

He/she will be empowered to inspect any greyhound attending the meeting as he/she sees fit (including those kept in owner/trainer's vehicles at or near the track before or after racing), and to recommend appropriate treatment and/or to stop the greyhound from racing.

If, in the opinion of any veterinary surgeon, the destruction of, or an urgent operation on, a greyhound in the charge of a licensed owner/trainer is necessary, the veterinary surgeon shall be entitled to proceed with such destruction or operation without the permission of the owner.

The cost of any treatment administered to greyhounds by the veterinary surgeon will be met by the owner/trainer.

The track owner will co-operate with the veterinary surgeon to enable him/her to fulfil his/her role.

If any person refuses to allow the veterinary surgeon to treat a greyhound or in any way obstructs him/her in carrying out his/her role the veterinary surgeon will report this immediately to the track owner or manager and as soon as possible to the licensing authority.

2.9 Veterinary facilities

There must be an adequate, lockable first aid room, if possible out of sight and sound of the public, for the track vet to inspect greyhounds or to attend injured greyhounds. Alternatively, a mobile surgery may be used so long as it meets the specifications in this section.

The facility should contain an examination table large enough to take a recumbent greyhound and with a non slip surface that is easily cleanable. Good lighting is essential above this table. A sink and drainer must be provided with hot and cold running water. Heating must be provided in the room.

Drugs must not be kept on track premises when the veterinary surgeon is not in attendance. The veterinary surgeon is responsible for the safe keeping of all drugs and medications.

The Track owner will be responsible for keeping a permanent room clean and tidy and maintaining all fittings, furniture and equipment in suitable working order.

The veterinary surgeon will be responsible for keeping a mobile facility clean and tidy and maintaining all fittings, furniture and equipment in suitable working order, unless the mobile facility is owned by the track in which case the Track owner will be responsible.

The Veterinary surgeon will be responsible for providing all instruments, medication, dressings etc necessary for the treatment of greyhounds. The track will be responsible for paying for these.

The veterinary surgeon will be responsible for the disposal of all sharps and surgical waste.

Further guidelines:

It is advisable for the track to provide in the treatment room:

- A small fridge in which to store certain medications and dressings (during racing only)
- A telephone or radio link with race officials
- A speaker connected to the public address system.
- A monitor linked to the track's closed circuit system (where there is one) so that the Veterinary Surgeon is able to view replays to help assess the cause of and treatment for an injury.

2.10 Access for inspection

Each track shall allow free access to racecourse premises to inspectors appointed by the licensing authority for Wales, and co-operate fully with them to monitor and help assure the implementation of these regulations

3. Kennel Licence

Any premises where five or more racing greyhounds are kept must have a current kennel licence that must be renewed annually. For the purposes of these regulations a racing greyhound is a greyhound that is entered in the database as a racing greyhound.

The licensing authority will only grant or renew the kennel licence if it is satisfied that the kennels provide suitable accommodation for the racing greyhounds kept there.

The Greyhound Forum for Wales welcomes situations where owners of racing greyhounds keep their dogs in their own home and such accommodation will in most cases be deemed suitable.

The licensing authority may require that certain works are carried out over a reasonable period of time to bring existing premises up to the desired standard. In such cases a license may be granted subject to these works being completed by the agreed date. This should be termed a Conditional Licence and only remain applicable if the time scale for improvements is met.

In determining whether accommodation is suitable the licensing authority will take into account the 'Best practice guidelines for kennels', set out in the 'Charter for the Racing Greyhound' produced by the UK Greyhound Forum and appended to this document as Annex B, with the following provisos:

Provisos

- Paragraph 21 (changes underlined) to read: "During daylight hours natural light must be provided to exercise and sleeping areas so that all parts are clearly visible".
- Paragraph 25 (changes underlined) to read: "No animals other than greyhounds are to be boarded within the facilities without written approval of the licensing authority".
- In addition, some parts of the code of practice may be felt to be appropriate only to larger kennels such as those housing say 10 dogs or more, while others may require interpretation or adaptation. Examples of such areas are:
 - Paragraphs 43-46 (kitchen facilities): In the case of smaller kennels of 9 or less dogs where these kennels are located within the garden or yard of the owner/trainer's homes, storage and refrigeration facilities should still be available but it may be felt acceptable that these could be within the owner/trainer's home. In the case of larger kennels of 10 or more dogs and where smaller kennels are more than 30 metres from the owner/trainer's home however, it might be felt necessary that suitable storage, cooking and refrigeration facilities should be provided at the kennels.
 - Paragraph 49 (marking of kennels): the numbering or marking of kennels may be felt not to be necessary in the case of kennels housing fewer than 10 dogs.

Further consideration is needed as to how the kennelling guidelines should be applied to kennels of different sizes.

4. Owner/Trainer Licence

4.1 Conditions of licence

Every owner/trainer of a greyhound racing in Wales must have a current owner/trainers licence.

At the start of the regulatory system applications for owner/trainers licences will be made retrospectively i.e. by owner/trainers who already own racing greyhounds. Once the regulatory system is established it will be advisable for new owner/trainers to apply for a licence in advance of owning a racing greyhound.

The owner/trainer's licence must be produced each time the owner/trainer races a greyhound at a Welsh Track.

The owner/trainer of a greyhound shall provide his true name and address, together with fixed telephone line*, mobile telephone line* and email* details (*where these exist). The name and address of the owner/trainer must be verified by a passport, photo driving licence, or two recent utility bills/bank statements.

The owner/trainer must provide two recent passport size photographs one of which will be fixed to the licence and one of which will be sent to the Greyhound Forum for Wales.

The licence will be updated each time an owner/trainer acquires a new greyhound (from their first appearance at a track for trialling or racing) or disposes of an existing greyhound, or if a greyhound's appearance changes. The licence will be renewed every 5 years unless it is suspended or revoked by the licensing authority or unless the owner/trainer relinquishes it.

The owner/trainer of a greyhound is responsible for keeping this information up to date by informing a Welsh Track Manager or the Licensing Authority for Wales of any changes.

4.2 Compliance with veterinary advice

The owner or trainer will comply with any advice given by a qualified veterinary surgeon present at a race meeting or carrying out an inspection at their premises.

4.3 Co-operation with inspectors

The owner or trainer will co-operate fully with welfare officers and inspectors and provide them with reasonable access to their property, vehicles or records to enable them to fulfil their duties under these regulations.

The owner/trainer will not withhold any information requested by a welfare officer or inspector.

4.4 Details of Greyhounds owned/trained

Every greyhound racing, or trialling owned or trained must be listed, including microchip number on the owner/trainer licence. The licence must be produced by the owner/trainer every time the greyhound races.

The owner/trainer of the greyhound is responsible for informing the licensing authority for Wales (either directly or through a Track Manager) by completing and returning a change of ownership/adoption form, if they sell or dispose of a greyhound.

4.5 Transfer of ownership

If an owner/trainer sells or disposes of a greyhound to another person resident in or outside of Wales with the intention that the greyhound will continue to race, the owner/trainer must complete a transfer of ownership form. When a greyhound retires from racing an owner/trainer must complete a 'final fate' form detailing which of the acceptable arrangements have been made for the greyhound. The owner/trainer will be responsible for ensuring that all details, including the name, address and contact details of the details of the new owner are accurate.

4.6 Responsibility of owner/trainer

The owner/trainer of a greyhound is responsible for the welfare of a greyhound and also for making acceptable arrangements for his retired greyhound as follows.

- (i) The greyhound be retained as a pet. In this case the owner/trainer will complete an adoption form approved or issued by the Greyhound Forum for Wales and return this to the Greyhound Forum for Wales.
- (ii) The greyhound be handed to a reputable welfare organisation approved by the Greyhound Forum for Wales. In this case the owner/trainer will complete a transfer of ownership form approved or issued by the Wales Greyhound forum and return this to the Greyhound Forum for Wales.
- (iii) The greyhound shall be found a home as a pet by the owner/trainer. In this case the owner/trainer will need to show that they have followed such good practice guidelines as may be issued by the Greyhound Forum for Wales. They will also ensure that the new owner completes an adoption form approved or issued by the Greyhound Forum for Wales and they will be responsible for returning the form to the Forum and ensuring that the details provided by the new owner are accurate.
- (iv) The greyhound shall be euthanased by a qualified veterinary surgeon. In this case the owner/trainer will need to show that they have attempted to follow a, b or c above and give reasons why it has not been possible to do so by completing the appropriate form issued by the Greyhound Forum for Wales. This form must also be verified and signed by the veterinary surgeon carrying out the euthanasia. The completed form signed by the owner/trainer and the veterinary surgeon must be returned to the Greyhound Forum for Wales by the owner/trainer.

5. Transport

5.1 Greyhounds kept in vehicles at race events

These regulations do not require tracks to provide kennels for greyhounds attending race meetings. Most greyhounds will therefore be kept in owner/trainers vehicles for some time at race events. It is therefore particularly important that these regulations are adhered to when greyhounds are in stationary vehicles as well as during transport.

5.2 Cooling down after racing

Greyhounds will not be loaded into vehicles until suitably cooled down and will be offered water before being loaded.

5.3 Reasonable Temperature

Whilst the Greyhound is being contained/transported, the vehicle temperature should be maintained between 10°C and 22°C.

5.4 Adequate space in a vehicle

A cage to contain a greyhound should be of adequate size to protect the greyhound's welfare.

The welfare groups on the Forum also believe that the cage should allow the greyhound to stand fully and lie comfortably, and be constructed so as not to cause any harm to the dog.

5.5 Restraint during transport

Greyhounds must be restrained during transport. This may either be by a properly secured harness if travelling in the back of a car, by using a secure dog guard in an estate car, or in cages secured to the vehicle, or in a purpose built trailer or vehicle.

5.6 Checking on stationary vehicles

It is the owner/trainer's responsibility to ensure that checks are made sufficiently frequently on greyhounds that are kept in vehicles at race meetings to ensure that all the above regulations are met.

5.7 Checking on dogs in transit

It is the owner/trainer's responsibility to ensure that checks are made sufficiently frequently on greyhounds that are in transit but not in the same space as the driver of the vehicle.

ANNEX A

Examples of proposed Owner/Trainers Licence and associated traceability forms

Note: The Greyhound Forum for Wales is aware of research being carried out by the Society of Greyhound Veterinarians into the merits of different methods to assure the traceability of greyhounds. The findings of this research may suggest changes to the system and the forms as set out in this annex.

Owner/Trainer Licence no

**Owner/Trainer Licence Registration
Welsh Greyhound Tracks**

ALL DETAILS MUST BE COMPLETED IN FULL

1st name Surname.....

Home address

..... Post Code.....

Address where dogs are kennelled/kept (if different from above)

..... Post Code.....

Home Tel No (Inc code)..... Mobile or 2nd No.....

Declaration by owner: I confirm that I am the person named above and all details about me are correct. I accept full responsibility of the greyhounds in my care in accordance with the Regulations. I confirm that I have been given a copy of the Regulations and I understand and agree to abide by all that is contained within it. I agree to update these records with a Welsh track manager if any changes occur.

Signed Date.....

Declaration by registrar: I confirm that the 2 photographs provided give a true likeness to the person named above. I have been given the following items for identification (tick one):

Drivers licence (photo card and paper copy). Licence number

Valid UK passport. Passport number

2 utility bills showing above name and address.
Please complete here what bills/company they are from

And reference numbers/account numbers associated with these bills

Signed – Registrar..... Name Date.....

Greyhounds in the care of the above named owner trainer at date:

Racing name	Pet name	Sex	D.O.B./Age on registration	Microchip No	Earmarks	Description

Owner/Trainer Licence no.....

**Greyhound Change of Ownership
Welsh Greyhound Tracks**

ALL DETAILS MUST BE COMPLETED IN FULL

THIS SECTION IS TO BE COMPLETED BY CURRENT OWNER

Owner's 1st name..... Owner's Surname

Owner's Address.....

..... Post Code.....

Home Tel No (inc code)..... Mobile or 2nd No.....

Greyhound's Earmarks Greyhound's Microchip Number

Racing Name..... Pet Name

Sex of Greyhound D.O.B. or Approx age at registration.....

Colour..... Distinguishing features

.....

(Note – in the final version of the form this part may be a description or a diagram – details to be decided in light of research into greyhound identification being carried out by the Society of Greyhound Veterinarians.)

Declaration by current owner: I confirm that I am the current owner of the greyhound described above and all details are correct. I understand that full ownership and responsibility of the greyhound has now passed to the new owner.

Signed Date.....

Signed – Registrar Name Date.....

THIS SECTION IS TO BE COMPLETED BY NEW OWNER

Owner's 1st name..... Owner's Surname

Owner's Address.....

..... Post Code.....

Home Tel No (inc code)..... Mobile or 2nd No.....

Declaration by new owner: I confirm that I am the new owner of the greyhound described above and all details are correct. I understand that full ownership and responsibility of the greyhound has now passed to me as from this day of declaration. I agree to update these records with a Welsh track manager or the licensing authority for Wales if any changes occur in accordance with the Regulations. I agree to complete 'change of ownership' record if/when the ownership greyhound described above changes. I have been given the Regulations and I understand and agree to abide by all that is contained within.

Signed Date.....

Signed – Registrar Name Date.....

Owner/Trainer Licence no.....

Final Fate Welsh Greyhound Tracks

ALL DETAILS MUST BE COMPLETED IN FULL

Owner's 1st name..... Owner's Surname

Owner's Address.....

..... Post Code.....

Home Tel No (inc code)..... Mobile or 2nd No.....

Greyhound's Earmarks..... Greyhound's Microchip Number

Racing Name..... Pet Name

Sex of Greyhound..... D.O.B or Approx age at registration.....

Colour..... Distinguishing features

.....

(Note in the final version of the form this may be a description or a diagram – details to be decided in the light of research into greyhound identification being carried out by the Society of Greyhound Veterinarians.)

Final Fate – please tick A, B, C, D or E, and complete the details in that section

A) Dog kept as a pet by owner (if rehomed to someone else then 'change of ownership form is required)

I understand that the dog's welfare remains my full and total responsibility (as per the Regulations). I understand that I may be called upon at any time to present the dog and I am obliged to do so immediately. I agree to update the registrar if this situation changes and complete relevant paperwork in accordance with the Regulations.

B) Dog rehomed to a rescue organisation

Name of rescue organisation

Name of rescue organisation rep dog was handed to.....

Date dog was handed over

RESCUE ORGANISATION OFFICIAL HANDOVER RECEIPT MUST BE ATTACHED TO VALIDATE THIS OPTION – MUST INCLUDE DETAILED DESCRIPTION OF DOG INC. MICROCHIP NUMBER/EARMARKS.

C) Dog re-homed to a third party as a pet by owner

I have followed Greyhound Forum for Wales guidelines of good practice in re-homing a greyhound and I am satisfied that the owner will offer a good home as a pet to the greyhound. I attach a completed adoption form approved by the Greyhound Forum for Wales and I certify that the details on this form are correct to the best of my knowledge. (cont)

D) Euthanasia by a vet

Declaration by owner that at least 5 rescue organisations were contacted but unable to take the dog at any time.

- 1) Name of organisation Person contacted Date call made
- 2) Name of organisation Person contacted Date call made
- 3) Name of organisation Person contacted Date call made
- 4) Name of organisation Person contacted Date call made
- 5) Name of organisation Person contacted Date call made

VET STAMPED RECEIPT OF EUTHANASIA PROCEDURE MUST BE ATTACHED TO VALIDATE THIS OPTION – MUST INCLUDE DETAILED DESCRIPTION OF DOG INCLUDING MICROCHIP NUMBER/EARMARKS.

E) Sudden Death

VET STAMPED RECEIPT OF POST DEATH EXAMINATION MUST BE ATTACHED TO VALIDATE THIS OPTION – MUST INCLUDE DETAILED DESCRIPTION OF DOG INCLUDING MICROCHIP NUMBER/EARMARKS.

Declaration by owner

I confirm that I am the owner of the greyhound and fate described above and all details are correct.

Signed Date.....

Registrar – all receipts attached are correct according to the rule book.

Signed – Registrar Name Date.....

ANNEX B

Guidelines for Good Practice – Kennels

Please note that we have taken these guidelines from the **UK Greyhound Forum** (and amended them slightly) – as such they represent a comprehensive, but perhaps not complete, perspective on kennelling.

Construction

General

1. The establishment must, at all times, be laid out and operated in accordance with an approved plan, and plans must be submitted to an approved by the licensing officer.
2. Where wood has been used in existing construction it must be smooth and treated to render it impervious. Wood should not be used in exposed construction of walls, floors, partitions, door frames or doors in the dog kennelling area. There must be no projections liable to cause injury.
3. Fencing material must be secure and safe.
4. Sleeping areas of kennels must be so insulated as to prevent extremes of temperature.
5. The construction must be such that the security of the dog is ensured.
6. All exterior wood must be properly treated against wood rot, eg Tanalised.
7. All internal surfaces used in the construction of walls, floors, partitions, doors and door frames to be durable, smooth and impervious. There must be no projections or rough edges liable to cause injury.

Some existing premises may not comply with these requirements. In such circumstances improvements to do so should be a condition of licensing with clear timescales for implementation.

The point of these standards is to provide good welfare conditions for dogs. To do so the kennels must be properly maintained and in a clean state and the conditions are to ensure this is so.

Wood is generally to be avoided because it can be difficult to clean adequately and has a high maintenance burden. Worn or splintered wood can also present a hazard to dogs as well as being difficult to clean.

Where galvanised wire mesh is used for fencing the wire diameter must not be less than 2.0mm (14SWG) excluding any covering and the mesh size must not exceed 50mm (2”).

The conditions should be backed up with a hygienic and safe scheme of work to protect both the welfare of the dogs and to provide a safe working environment for staff.

Walls and Partitions

8. Walls with which dogs may come into contact must be smooth impervious materials, capable of being easily cleansed. Where concrete or other building blocks or bricks are used in such walls, they must be sealed so as to be smooth and impervious, and resealed as necessary.
9. Junctions between vertical and horizontal sections should be covered. If impractical in existing premises, all joints must be sealed.
10. Partitions between dogs should allow some social contact while preventing any injury from possible aggression and this may best be achieved using a wire mesh construction.

Suitable materials for the construction of walls would be concrete block, brick, moulded plastic, glass reinforced plastic and pre-formed plastic surfaced board. Where block or brick is used the surface must be made impervious using a proprietary water proofing agent for sealing the wall against damp penetration. Under some circumstances this can be achieved by rendering prior to sealing.

Floors

11. Floors of all buildings, individual exercise areas and kennels must be of smooth, impervious materials, capable of being easily cleansed and in new kennels must incorporate a damp proof membrane.

Floors of kennels and related exercise areas should be constructed in impervious material and be capable of cleansing while providing sufficient grip for the dog to walk and run without sustaining injury.

Submission to the Welsh Assembly Government

12. All floors of kennels and individual exercise areas must be constructed and maintained in such a condition as to prevent ponding of liquids.
13. In new construction floors must be laid to a minimum fall of 1 in 80 leading to a shallow drainage channel or effectively covered deep drainage channel.
14. Communal exercise areas must be suitably drained but need not comply with conditions 11 and 12.

Drainage channels should be provided near to the kennel edge so that urine is not allowed to pass over walk areas in corridors and communal exercise areas. It is reasonable to drain a bedding area in the opposite direction to the exercise area if separate drainage channels are provided.

Ceilings

15. Ceilings must be capable of being easily cleansed.

Doors

16. Kennel doors must be strong enough to resist impact and scratching and must be fitted to be capable of being effectively secured.
17. Where metal bars and frames are used, they must be of suitable gauge (approximately 10-14 SWG) with spacing adequate to prevent dogs escaping or becoming entrapped. Where metal edging is used, this must not present a risk of injury to the dog.
18. Door openings must be constructed such that the passage of water/waste is not impeded, or allowed to gather due to inaccessibility.

Where galvanised wire mesh is used for doors the wire diameter must not be less than 2.0 mm (14SWG) excluding any covering and the mesh size must not exceed 50mm (2").

When designing kennel doors regard should be paid to the health and safety of persons working in the kennel. It may be easier for staff to gain access and egress by having the door opening inwards.

Windows

19. All windows, which pose a security risk, must be escape proof at all times.

Windows must either be constructed of reinforced (toughened) glass or polycarbonate or suitably protected by welded mesh to prevent breakage.

Drainage

20. The establishment must be connected to main drainage or an approved, localised sewage disposal system.

Lighting

21. During daylight hours light must be provided to exercise and sleeping areas so that all parts are clearly visible. Where practicable this must be natural light.
22. Adequate supplementary lighting must be provided through the establishment.

Natural and artificial lighting must be of sufficient standard to allow proper observation of dogs and cleaning of the establishment at all times.

Ventilation

23. Ventilation must be provided to all interior areas without the creation of excessive, localised draughts in the bedding area.

Dogs should be maintained in a draught free area with temperature and humidity controlled. Careful siting of the dog's bed is an important consideration as is the design of the bed itself (such as raised sides and lifting above ground level).

Maintenance

24. Maintenance and repair of the whole establishment must be carried out regularly.

Dogs permitted

25. No animals other than greyhounds are to be boarded within the facilities.

Kennel Size, Layout and Exercise Facilities

26. For new kennels each kennel must be provided with a sleeping area of at least 1.9sq m (20sq ft.)
27. Suitable bedding equipment must be provided which allows the dog to be comfortable and which is capable of being easily and adequately cleaned and sanitised. Such equipment must be sited out of draughts. All bedding material must be maintained in a clean, parasite-free and dry condition.
28. For new kennels, each kennel must be provided with an exercise area of at least 3.34 sq m (36 sq ft) for dogs, which is separate from the bedding area and exclusive to that kennel, for free use by the dog at all times except at night.
29. Kennels must have minimum height of 1.8m (6ft) to facilitate adequate access by kennel staff for cleaning.
30. Exercise areas must not be used as bedding areas.

In existing kennels it may be impossible to comply with the size standards. In such cases an agreed Action Plan should be put in place to ensure compliance over a few years.

It is a requirement of the Animal Welfare Act 2006 that an animal be allowed to display normal behaviour and as such dogs must have regular and appropriate exercise in addition to races and walks on the lead.

An Action Plan should be agreed as detailed in the notes on para 26. The exercise area should be roofed to a minimum of half the area, sufficient to give the dog protection against the weather. Some of this should be translucent material capable of filtering ultraviolet light and providing shade.

Management

Training

31. A written policy for training staff must be provided and must be demonstrated to have been carried out.

Staff training is an essential part of the management of a kennel and must be applied to all staff, permanent and temporary. Subjects which are covered should include cleanliness and hygiene, feeding and food preparation, recognition and treatment of sick animals, animal welfare, Health & Safety and emergency procedures.

Temperature in Kennels

32. Heating facilities must be available in the kennels and used according to the requirements of the individual dog.
33. There must be some part of the dog's sleeping area where the dog is able to enjoy a minimum temperature of at least 10°C (50°F) and a maximum of 22°C (79°F).

Many kennels have been built without proper regard for the welfare of the dogs. The materials on the kennel exterior may not offer adequate thermal protection against temperature variations throughout the majority of the year. While it is accepted that ambient temperatures may exceed the suggested maximum, measures must be in place to provide adequate ventilation to compensate.

It is not adequate for temperatures to fall above or below the suggested range because of inadequate design and attention should be given to insulation and orientation of the building to assist in thermal regulation. Kennels which face south will inevitably suffer more from high temperatures than those facing north. Adequate insulation will assist both in increasing temperatures in winter (and thereby reducing heating bills) and controlling temperatures in hot weather.

Adequate heating must be provided to maintain a minimum temperature. Exposed cables and naked flames are to be avoided. Heat lamps may provide adequate heat in cold weather.

Cleanliness

34. All kennels, corridors, common areas, kitchens etc must be kept clean and free from accumulations of dirt and dust and must be kept in such a manner as to be conducive to maintenance of disease control and dog comfort.
35. Each occupied kennel must be cleansed daily. All excreta and soiled material must be removed from all areas used by dogs at least daily and more often if necessary

A cleaning regime should be instituted to include the removal of solids, washing, disinfection and drying. The physical collection of faeces (bucket and shovel) is usual followed by washing with water and detergent although a pressure hose or steam cleaner is more effective. Simple disinfection is no alternative for thorough cleaning.

Where any disinfectant is used COSHH data sheets should be available in case of accidental spillage or injury to staff.

Submission to the Welsh Assembly Government

36. All bedding areas must be kept clean and dry.
37. Facilities must be provided for the proper reception, storage and disposal of all waste. Particular care should be taken to segregate clinical waste arising from the treatment and handling of dogs with infectious disease. The final disposal route for all waste must be incineration.
38. Measures must be taken to minimise the risks from rodents, insects and other pests within the establishment.

Arrangements must be made with the Waste Collection Authority or waste management contractor authorised for the purposes of the duty of care for removal of other wastes from the establishment under the Environment Protection Act 1990. Foul waste water must be discharged to the approved drainage system.

Food and Water Supplies

39. All dogs must be adequately supplied with suitable food. Wholesome water must be available at all times and changed daily.
40. Eating and drinking vessels must be capable of being easily cleansed and disinfected to prevent cross-contamination. They must be maintained in a clean condition.
41. Eating vessels must be cleansed after each meal.
42. Drinking vessels must be cleansed at least once a day.

Dogs should be fed to a standard compatible with the maintenance of health in a physically fit dog. Inspectors will assess the nutritional status of the dogs and the type and quality of food in store and in the process of preparation.

Food should not be left for excessive periods within the kennel to avoid smells and flies. More food and water may be required for young dogs. No food should be left out overnight.

Kitchen facilities

43. Kitchen facilities, hygienically constructed and maintained, must be provided for the storage and preparation of food for dogs.
44. Where fresh and cooked meats are stored, refrigeration facilities must be provided, and potential food contamination must be avoided.
45. A sink with hot and cold water must be provided for the washing of food equipment and eating and drinking vessels. If staff are employed, a separate wash-hand basin with hot and cold water must be provided for use.
46. Containers must be provided for the storage of food and shall be so constructed and kept in such good order, repair and condition as to be proof against insects and other pests.

Disease Control and Vaccination

47. All dogs should be vaccinated as puppies. Regular booster vaccination should be administered as advised by the veterinary surgeon. Advice should also be sought on other suitable preventative treatments.
48. A well stocked first-aid kit suitable for use on dogs must be available and accessible on site.

Where there is evidence of parasite infestation suitable treatment must be administered on the advice of a veterinary surgeon.

The first aid kit must be well stocked at all times with contents as advised by the veterinary surgeon.

A veterinary practice must be appointed to provide health care for the dogs. The telephone number for emergency contact must be readily available to staff.

Records and Identification of Kennels

49. Each kennel must be clearly marked (e.g. numbered), and a system in place which ensures that relevant information about the dog in that kennel is readily available.

Every dog's clinical records should be readily available for examination by staff and the veterinary surgeon. Clear marking of kennels and identification of the occupant is an essential part of this.

Supervision

50. A fit and proper person must always be present to exercise supervision and deal with emergencies whenever there are dogs at the premises.
51. Dogs must be visited at regular intervals as necessary for their health, safety and welfare.

Suitable intervals for visiting means intervals of not less than four hours between 08.00 and 18.00. A later visit may be appropriate but this should be balanced against the disturbance caused to the dogs and neighbours.

Fire Precautions

52. Appropriate steps must be taken for the protection of the dogs in case of fire or other emergencies.
53. A proper emergency evacuation plan and fire warning procedure must be drawn up and posted on the premises. This must include instructions on where dogs are to be evacuated to in the event of a fire or other emergency.
54. Fire fighting equipment must be provided in accordance with advice given by the Fire Prevention Officer or other suitably qualified person.
55. All electrical installations and appliances must be maintained in a safe condition. There must be a residual current circuit breaker system on each block of kennels.
56. Heating appliances must not be sited in a location or manner where they may present a risk of fire, or risk to dogs.
57. Precautions must be taken to prevent any accumulation which may present a risk of fire.
58. There must be adequate means of raising an alarm in the event of a fire or other emergency.

It is recommended that plans and details of the establishment are logged with the police and fire service. Fire protection advice should be sought from a suitably qualified person regarding appropriate fire extinguishers and their correct siting, fire drills and fire escapes, are implemented. A record of such events as extinguisher service and fire drills should be kept. The general principle of people first in the event of fire is good advice.

Where new buildings or rebuilding is being undertaken the fire prevention officer will give advice on fireproofing requirements.

Advice from a suitably qualified person should be in writing. Particular regard should be given to the storage of inflammable substances. Staff should have been trained to use fire extinguishers. It is advisable to install smoke detectors.

Dogs must not have access to open flame heating devices.

ANNEX C

Guidelines for Good Practice – Transport

Please note that we have taken these guidelines from the **NGRC Rules of Racing Appendix 2 – Guidelines for Transportation of Greyhounds**⁷ (and amended/updated them slightly) – as such they represent a comprehensive, but perhaps not complete, perspective on transportation.

Introduction

The transport of greyhounds is an intrinsic element of the greyhound racing industry; dogs rarely live and race at a single location. Furthermore the frequency of transport is likely to be greater than for most other dogs and takes place when the animal is likely to be subject to significant physiological stress resulting from racing or trialling. It is therefore important that transport conditions are optimal. In addition, Greyhounds are one of the few non-farmed species where there is significant national and international trade. This results in some long distance transport when it is also important that adequate conditions are provided for the dogs.

These guidelines are intended to assist persons transporting Greyhounds to provide those conditions. They are not prescriptive except in a small number of areas such as cage sizes.

Legislation

The main section of these guidelines is intended to provide information to people transporting healthy Greyhounds. In most instances in the racing industry it is likely that the law will regard such transport as 'commercial' and consequently subject to Council Regulation (EC) 1/2005 on the protection of animals during transport⁸ and The Welfare of Animals (Transport) (Wales) Order 2007, otherwise known as WATO. The conditions suggested in these guidelines should help transporters comply with WATO but the full document can be found at:

http://www.opsi.gov.uk/legislation/wales/wsi2007/wsi_20071047_mi.pdf

Further guidance can be found at:

http://new.wales.gov.uk/topics/environmentcountryside/ahw/animal_welfare/animalsintransport/?lang=en

See endnote for further guidance for when it is necessary to transport sick or injured Greyhounds.

WATO requires that, where any journey is greater than 65km an Animal Transporter Authorisation must be granted and carried by the driver of the vehicle. The Regulation applies to all those involved with the transport of vertebrate animals in connection with an economic activity. For example, livestock and equine hauliers, farmers, animal breeders, transporters of performing animals and those working at markets assembly centres and slaughterhouses. It does not apply to individuals who ride for pleasure who transport their own horse or to individuals taking their own pets on holiday. It also doesn't apply to a farmer transporting a single animal.

Further information including guidance and the relevant forms can be found at:

http://new.wales.gov.uk/topics/environmentcountryside/ahw/animal_welfare/animalsintransport/?lang=en

Of course all other animal welfare legislation is also applicable. The Animal Welfare Act 2006⁹ imposes a general 'duty of care' on all owners and keepers to provide good conditions for their dogs at all times.

General conditions

During any transport by road the driver must be conscious of the fact that he or she is transporting sentient animals and has a duty of care to ensure that the standard of driving and care is commensurate with their comfort (i.e. drive sensibly). Keepers of Greyhounds should ensure that drivers have been trained and shown themselves to be competent in the care of the dogs.

The expected journey time from trainer's kennels to the attached track for racing should be less than four hours.

Greyhounds should not be loaded for transport for at least thirty minutes after racing to allow them to cool.

Planning

Habituation is vital to reduce transport stress. This should be achieved before fourteen weeks of age if possible so that the greyhound is used to being transported. It will also help to introduce a sapling to the wider world at the same age and well before initial trials at about eleven months of age.

⁷ http://www.ngrc.org.uk/rule_book.asp?rule=223

⁸ http://eur-lex.europa.eu/LexUriServ/site/en/oj/2005/l_003/l_00320050105en00010044.pdf

⁹ http://new.wales.gov.uk/topics/environmentcountryside/ahw/animal_welfare/animalwelfareact2006/

The conditions provided should partly be related to the length of the journey. All journeys should be properly planned and this should include planning in the event that the expected journey time is exceeded as well as locations of stops for watering, feeding or emptying. Such detail should be included in the ATC.

Other factors to be taken into account are the mode of travel e.g. car, sea or air and the opportunity to rest.

No segment of a journey should exceed twenty-four hours and there must be a twelve hour rest period before any subsequent journey. If any part of the journey includes a sea passage this must be included in the journey time.

Greyhounds must be restrained during transport. This may either be by a properly secured harness if travelling in the back of a car, by using a secure dog guard in an estate car or in cages secured to the vehicle. The dogs should be completely contained inside the vehicle and the driver should consider other potential hazards such as gaps between seats in cars and door handles.

Greyhounds may travel in pairs in a car providing the cages are large enough and both dogs are muzzled. Cages in purpose-built vehicles should be designed for one dog.

If it is necessary to move a litter of puppies before weaning they should travel together. If they travel with their dam this should be in a double cage.

It may be useful to have a checklist to ensure that nothing has been forgotten.

Cages

Although the Greyhound Forum for Wales has agreed not to recommend a specific cage size, we do believe a cage to contain a greyhound should be of adequate size to protect its welfare. The individual members of the Greyhound Forum for Wales are likely to respond to a public consultation recommending their own beliefs with regards specific sizes.

The welfare groups on the Forum also believe that the cage should allow the greyhound to stand fully and lie comfortably, and be constructed so as not to cause any harm to the dog.

For travel by air, IATA rules on cage sizes must be followed. The current IATA Live Animals Regulations are obtainable from The Stationery Office, Tel: 020 7838 8400.

Cages should be constructed of impervious materials such as uPVC, rustproof (stainless) steel mesh or painted timber. They must have suitable slip-resistant flooring which may be easily cleaned to provide comfort for the greyhound. This may be provided by carpet, a mat or purpose designed material such as veterinary fleece bedding. The cage should be leak proof to prevent any urine leakage. The door must be adequately secured but able to be opened easily without tools in the event of an emergency.

All cages must be thoroughly cleaned between use. Where there is a possibility of cross-infection suitable disinfectant must be used after cleaning.

Vehicle

The vehicle temperature should be maintained between 10°C and 22°C at all times during transport. When the driver is not in the same space as the Greyhounds a remote monitoring device must display the temperature in the greyhound cabin and be visible from the driver's seat. If the temperature rises above 22°C it is important that dogs are regularly examined for signs of distress and removed from the vehicle to cool down if necessary. Temperature must be monitored and records kept.

Dogs keep themselves cool by evaporating water from their tongues by panting. In conditions of high temperature and high humidity this becomes ineffective and the dog will consequently suffer from heat stroke. It is therefore important that both temperature and humidity are controlled. Consequently wetting a dog to cool it may be counter-productive.

As a rough guide, if there is condensation inside a vehicle it is an indication that the humidity is too high and ventilation must be increased to prevent it.

The vehicle should be designed to provide a minimum of twelve air changes per hour at all times during transport. Cages in vehicles must have at least 40% of the wall area open to allow adequate air flow. This is best provided by a rust-proof (stainless) steel mesh door and back to the cage as well as additional open areas on its sides to allow ventilation through the cage.

Maintenance of temperature control and ventilation must be possible when the vehicle is stationary. This is best provided by full air conditioning. There must be a procedure for the provision of ventilation in an emergency; this may be as simple as opening all vehicle doors.

All vehicles carrying dogs must be equipped with a functioning and regularly serviced fire extinguisher. It may be advisable to provide an indication on the outside of the vehicle that live animals are being carried to alert the emergency services.

Care during the journey

For any journey over four hours adequate rest stops for watering, feeding and emptying must be included. Water must be provided every four hours, or frequently enough to prevent dehydration. Emptying must be provided every eight hours and food twenty-four hours.

Greyhounds should have free access to water until loaded for a journey. No food should be given for two hours before travelling and an opportunity to empty should be provided immediately before loading.

Additional Guidelines for the transport of sick or injured greyhounds

- A. A sick or injured dog may only be transported to enable it to be treated. A dog which is unable to fully stand on all four legs or is very close (before and after) to whelping is specifically excluded by WATO from routine transport. Similarly, puppies with unhealed navels are considered unsuitable for transport.
- B. The journey time for transport should be the minimum necessary to provide veterinary care for the greyhound. It is accepted that orthopaedic injuries may require a relatively lengthy journey to a specialist surgeon.
- C. When a greyhound is in severe pain appropriate pain relief must be provided by a veterinary surgeon. Where the pain is a result of a fracture consideration should be given to some form of temporary immobilisation of the fracture to reduce pain during transport. It may also be advisable to provide sedation in addition to pain relief. The veterinary surgeon in whose care the greyhound is at the commencement of the journey should be able to ensure that the pain relief and/or sedation provided will last for at least the proposed length of the journey. If this is not possible arrangements must be made for additional medication to be administered en route.
- D. An injured greyhound should preferably be transported in a vehicle where a person can at all times be with the dog to assist in restraint. A car is ideal.
- E. Because an injured dog is likely to be suffering from shock the vehicle temperature should be maintained at a minimum of 20°C and additional bedding should be supplied.



VOLUNTARY CODE OF PRACTICE:
THE WELFARE OF RACING
GREYHOUNDS (WALES)
Pack Page 196

PREFACE

The purpose of this Code is to explain what those responsible for the welfare of racing greyhounds in Wales need to do in order to meet the minimum standard of care the law requires, as well as encouraging the adoption of higher standards. In order to provide clear guidance, the Code has been written in such a way as to differentiate clearly between requirements which already exist in current legislation (indicated as “musts”), and voluntary standards of best practice (indicated as “shoulds”).

The Code is intended to cover every stage of a greyhound’s life cycle i.e. from birth to death. Hence the Code is relevant throughout a dog’s life and particularly when leaving the industry.

Those requirements indicated as a **must**, although not lifted verbatim, are those the Animal Welfare Network for Wales (AWNW) consider important in order to meet legislative provisions including the:

- 1 Animal Welfare Act 2006¹.
- 2 Welsh Government Code of Practice for the Welfare of Dogs².
- 3 Animal Welfare (Electronic Collars) (Wales) Regulation 2010³.
- 4 Microchipping of Dogs (Wales) Regulations (2015)⁴ and Animal Welfare (Breeding of Dogs) (Wales) Regulations 2014⁵.
- 5 Control of Dogs Order 1992⁶.
- 6 Welfare of Racing Greyhounds Regulations 2010⁷.

It is strongly recommended that persons responsible for racing greyhounds check the legislation for themselves to ensure they are familiar with the requirements.

The use of *should* indicates requirements relating to racing greyhounds that are based on provisions in legislation and mandatory codes outside of Wales and good practice guides including:

- 1 The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018⁸.
- 2 Animal Welfare (Keeping and Breeding of Racing Greyhounds in the Australian Capital Territory) Mandatory Code of Practice 2018⁹.
- 3 Greyhound Board of Great Britain (GBGB) Rules of Racing 2018¹⁰.
- 4 PAS 251:2017 Specification for greyhound trainers’ residential kennels¹¹.
- 5 RSPCA good practice guide for the welfare of seized dogs¹².

In addition, there are requirements and findings from recent research, that are particularly relevant to the greyhound industry, and which the authors and working group agree illustrate good practice.

Throughout the Code, there are also recommendations of best practice which encourage those working with racing greyhounds to adopt the highest standard of care. These are identified by requirements starting with ‘It is recommended that...’.

¹ <https://www.legislation.gov.uk/ukpga/2006/45/contents>

² <https://gov.wales/code-of-practice-for-the-welfare-of-dogs>

³ <https://www.legislation.gov.uk/wsi/2010/943/contents/made>

⁴ <http://www.legislation.gov.uk/wsi/2015/1990/contents/made>

⁵ <http://www.legislation.gov.uk/wsi/2014/3266/contents/made> N.B. whether a person is required to comply with the breeding regulations is dependent upon whether or not they are required to hold a breeding licence. It is strongly recommended that persons responsible for racing greyhounds check the legislation for themselves to ensure they are familiar with the requirements.

⁶ <https://www.legislation.gov.uk/ukxi/1992/901/contents/made>

⁷ <https://www.legislation.gov.uk/ukxi/2010/543/contents>

⁸ <https://www.legislation.gov.uk/ukdsi/2018/9780111165485/schedule/1?view=plain>

⁹ https://www.act.gov.au/_data/assets/word_doc/0006/1194306/Code-of-Practice-2018-Racing-Greyhounds.docx This code, although written primarily for greyhounds racing in the Australian Capital Territory, has been used predominantly throughout this code as it is evidence-based in approach.

¹⁰ <https://www.gbgb.org.uk/rules-regulation/rules-of-racing/>

¹¹ <https://www.bsigroup.com/en-GB/about-bsi/media-centre/press-releases/2017/January/New-specification-for-care-of-racing-greyhounds-launched/>

¹² <http://politicalanimal.org.uk/wp-content/uploads/2015/04/RSPCA-Guide-The-welfare-of-seized-dogs-in-kennels.compressed.pdf>

You should be aware that the legislation cited in the Code and its Appendices is correct at the date of issue, but may be subject to subsequent change. This preface is not part of the Code, but is intended to explain the Code's purpose and broad aims. Similarly, the Appendices which highlight the relevant legal requirements are not part of the Code.

The Code of Practice is intended to ensure that those with responsibility for the welfare of racing greyhounds meet the minimum legislative standard and are encouraged to adopt the highest standards of care.

DEFINITIONS

For the purpose of this document, a racing greyhound is defined as a dog which is being bred from, reared for, kept, and/or used for the purposes of the racing industry.



Image: Nerys Royal



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PART 1: GENERAL GUIDANCE

- 1 **Small animals (such as rabbits, hares, mice, guinea pigs, cats etc.) must not be housed in areas to which racing greyhounds have physical, visual or olfactory access.**
- 2 *All establishments breeding, rearing, racing or housing greyhounds should have a Welfare and Management Plan (WMP) in place for general operational matters and greyhound management, welfare, socialisation, enrichment and education (as appropriate).*
- 3 *The WMP should outline any protocols that differ from the requirements outlined in this Code and should be reviewed annually. Where protocols are not specified, the requirements outlined in this Code apply.*
- 4 *If an establishment has multiple Persons in Charge, then the WMP should identify the Person in Charge (PIC) responsible for each area of the establishment or component of the WMP, including shared/common areas.*
- 5 *WMPs should be approved by a veterinary surgeon initially, and every three years thereafter. If there is a change in the veterinary surgeon supporting the establishment, the new veterinary surgeon should be provided with the WMP as soon as possible.*
- 6 *Smoke alarms should be installed and fire-fighting equipment available, well maintained and staff trained to use it.*
- 7 *All housing establishments should be inspected by a veterinary surgeon at least annually.*
- 8 *For all sites at which dogs are kept away from their carer's or owner's place of residence, an emergency contact number should be displayed at the external entrance. The establishment should have a clearly displayed emergency evacuation plan and a fire warning procedure.*
- 9 *The contact information and location of the veterinary practice should be displayed for access by all staff. This should include out of hours provisions.*
- 10 *There should be a working telephone on the premises whenever staff are present, available for making contact with emergency services.*

PART 2: BREEDING

a. Selection of dogs for breeding

- 1 *Breeding mates should not be closely related, for example, father and daughter; brother and sister; mother and son. First degree matings should not occur nor should second degree matings (for example, grandfather and granddaughter).*
- 2 *No greyhound should be kept for breeding if it can be reasonably expected (on the basis of its genotype, phenotype or state of health) that breeding from it could have a detrimental effect on its own health or welfare, or that of its offspring. As well as consideration of physical health, dogs who exhibit high levels of fearful behaviours should not be kept for the purposes of breeding.*
- 3 *It is strongly recommended that all breeding greyhounds are genetically tested for any heritable defects before being bred from, where an effective and reliable test is commercially available. If carers are unsure of which tests are applicable, they should consult with a veterinary surgeon. Any greyhounds in the establishment who carry recessive genes for any heritable defect that causes disease or disorder should not be bred from.*
- 4 *If any offspring have a heritable defect, then the Person in Charge of those offspring should develop a health and neutering plan in conjunction with a veterinary surgeon, and all details about the heritable disorder and likely outcomes for the greyhounds should be fully disclosed to their registered owners and any prospective purchasers.*
- 5 *If a Person in Charge is notified that a greyhound sold by them has been diagnosed by a veterinary surgeon as having a heritable defect, they should stop breeding from that greyhound's parents until:
 - i) *at least one of the parents has been tested for the heritable defect, if that parent is still used for breeding and an acceptable test is available. If an acceptable test is not available, a veterinary surgeon should assess at least one of the parents for the heritable defect;*
 - ii) *other offspring of those parents still residing at the establishment have been tested for the heritable defect, where an acceptable test is available.**
- 6 **Male and female greyhounds must be at least 12 months of age and should be at least 18 months old, prior to their first service.**
- 7 *Any dog intended for breeding should have a general health check by a veterinary surgeon prior to its first service to determine whether it is physically mature and suitable for breeding purposes.*
- 8 *The health of the greyhound brood bitch should be assessed no more than four weeks prior to mating.*
- 9 *The Person in Charge should obtain a certificate from the veterinary surgeon to state that the greyhound, at the time of examination, was suitable to breed.*
- 10 **A female greyhound must not have more than six litters in her lifetime and should have no more than four.** *Unless she has been examined by a veterinary surgeon who is of the opinion that producing further litters will not be detrimental to her health or welfare.*
- 11 **A female greyhound must not give birth to more than one litter of puppies in a 12 month period (and should not give birth to more than one per 18 months).**
- 12 *A female dog should not be bred from if over six years of age.*
- 13 **All breeding greyhounds must have daily access to a safe and secure outdoor area where they can exercise, play, interact and explore their surroundings. This should be for a minimum of 30 minutes per day.**
- 14 *Female greyhounds near or in oestrus should not be housed with or within olfactory contact with entire male greyhounds nine months or older.*

b. Mating (including artificial insemination)

- 1 *Natural mating pairs should be physically separated from other animals and supervised during mating.*
- 2 *A male greyhound should not be put with more than one female at any one time for natural mating purposes.*
- 3 *Dog breeding or mating stands (which restrict the bitch's ability to move or turn and thereby resist being mated) should not be used.*
- 4 *If the female greyhound is being unduly harassed by the male greyhound, she should be removed, and the advice of a veterinary surgeon sought.*
- 5 *After mating, both greyhounds should be physically separated, assessed for signs of injury, and treatment provided where necessary.*
- 6 *A male greyhound should not be used for service more than 14 times per month, including natural mating, insemination and semen extraction.*
- 7 *A female greyhound should wait an appropriate time after a previous mating, as guided by a veterinary surgeon.*
- 8 **Transcervical artificial insemination must only be performed by a veterinary surgeon.**
- 9 **If transvaginal insemination is carried out, it must be carried out by a suitably trained person, but it is recommended that it is only carried out by a veterinary surgeon.**

c. Whelping

- 1 *At least seven days before her due date (unless there is a likelihood of stress or injury), a pregnant greyhound should be moved to a whelping housing area, which is sufficiently*

large to allow her to exhibit her natural behaviours and to rest away from the litter.

- 2 *The whelping area should not isolate the bitch and litter from the sight, sound and smell of other familiar bitches and daily contact with humans.*
- 3 *An area should be provided within the whelping area, where a bitch can rest away from her puppies.*
- 4 *As soon as the greyhound shows signs of whelping, fresh bedding material should be provided and the bitch and neonatal puppies should be monitored at all times by someone with experience of the normal whelping process and the ability to recognise any abnormal course of events immediately and seek veterinary advice.*
- 5 *No prescription medicines should be administered to a whelping bitch unless under the direction of a veterinary surgeon.*
- 6 *If there are any abnormalities observed or concerns for the welfare of the female greyhound or puppies during the whelping process, the advice of a veterinary surgeon should be immediately sought.*
- 7 **If required, a caesarean section must be performed by a veterinary surgeon and must include appropriate anaesthesia and pain relief.**
- 8 *Post operative care, following caesarean section, should include adequate pain relief and be carried out according to the exact instructions of the veterinary surgeon.*
- 9 *The Person in Charge should obtain written veterinary advice regarding greyhound caesarean section after-care including exercise protocols.*
- 10 **Greyhound keepers must seek veterinary advice if post-operative complications arise.**
- 11 *After whelping is complete, the Person in Charge or other staff should:*

- i) *monitor the female greyhound and her puppies at least every three hours for the first 48 hours, and six-hourly thereafter until the puppies are feeding and maternal acceptance has been firmly established; conduct a puppy health check within 12 hours of whelping;*
 - ii) *clean the whelping area and change all bedding material, within 24 hours.*
- 12** *Bedding should be safe for the puppies and not create a risk of suffocation, or of puppies becoming squashed under multiple layers.*
- 13** **Puppies must be handled regularly from shortly (within a week) after birth, for short periods to habituate them to human contact and to examine them for any signs of injury, illness or disease and to ensure they are gaining weight (also see Part 5: Rearing).**
- 14** *Pregnant and lactating greyhounds should be fed at least twice daily, with food of appropriate nutritional quality, and in sufficient quantity, to satisfy their needs or fed under the direction of a veterinary surgeon.*
- 15** *A female greyhound should have a general health check by a veterinary surgeon within eight weeks of whelping.*
- 16** *A female should not participate in trialling or racing for at least ten weeks after whelping. The Person in Charge should obtain a certificate from a veterinary surgeon to state that the female is healthy after whelping, before it returns to racing.*
- 17** *Females should only have a maximum of two, and it is recommended only one caesarean section, after which they should not be mated and ideally be spayed.*



Image: Debra Allen

PART 3: IDENTIFICATION AND TRACEABILITY

The working group strongly believe that the requirements for mandatory identification of racing greyhounds and recording of relevant details on a database are critical to ensure the traceability of racing greyhounds throughout their career. Without this, it is impossible to know the numbers and future of those dogs deemed unsuitable for racing pre-trialling, after injury or at the end of their racing career.

Provisions for the identification and traceability of racing greyhounds in England are laid out in 'The Welfare of Racing Greyhounds Regulations 2010'¹³ and these have been adopted in this Code.

1 All dogs over eight weeks of age must be microchipped¹⁴ and the keeper's details registered on an approved database.

2 Greyhounds, when in a public place (except at the racetrack) must wear a collar with the name and address of the owner inscribed on it or on a plate or badge attached to it.

- i) it is recommended that dogs are not tattooed as this could cause unnecessary pain. *However, if it this does occur it should be done with appropriate analgesia;*
- ii) *all live-born puppies in each litter should be registered within a recognised greyhound studbook within seven days of birth;*
- iii) *the track operator should ensure that every greyhound that is raced or trialed at their track has their details recorded on*

a database. These should include: their name; microchip and tattoo (if appropriate) number; sex; date of birth; a record that the breed is a greyhound; the name and address of the owner(s) and trainer(s); a contact telephone number for each owner and trainer and a reference to any other greyhounds registered under the owner and trainer's name on the database. This information should be kept in accordance with data protection legislation.

3 *the track operator should request owners or trainers to produce photographic identification with proof of their name and address before a greyhound is entered into a race or trial at the track for the first time. The operator should keep these records in accordance with data protection legislation.*

¹³ <https://www.legislation.gov.uk/ukdsi/2010/9780111489727/contents>

¹⁴ Republic of Ireland - <http://www.irishstatutebook.ie/eli/2011/0624/ise/en/pdf>; Northern Ireland - <https://www.nidirect.gov.uk/articles/dog-licensing-and-microchipping>; Scotland - <https://www.legislation.gov.uk/sdsi/2016/9780111030127>; England - <http://www.legislation.gov.uk/ukdsi/2015/108/contents/made>; Wales - <http://www.legislation.gov.uk/wsi/2015/1990/contents/made>

PART 4: LACTATION

- 1 *Monitoring of lactating greyhounds should include regular observations at least every four hours of:*
 - i) *puppies feeding;*
 - ii) *the greyhound lactating;*
 - iii) *if applicable, monitoring of caesarean wounds for redness, swelling and discharge.*
- 2 *Soiled bedding material should be removed, and clean bedding material provided daily during lactation.*
- 3 *For the first week post-whelp, bitches should be examined twice daily for mastitis and veterinary attention provided immediately if this is suspected.*
- 4 *Lactating bitches should be allowed a minimum of four periods a day for toileting and exercise away from their puppies.*
- 5 **Newborn puppies must be provided with additional local heating (such as a heat lamp with a 25 watt globe) within the whelping enclosure for the first 10 days after birth and should always have access to an area between 26°C and 28°C.**
- 6 *When weather is hot, they should also have access to an alternative cooler area, so that an appropriate body temperature can be maintained by the mother.*
- 7 *Puppies from three weeks of age to the end of weaning should be provided with appropriate food for their age of development in a shallow food receptacle.*
- 8 *Fully weaned puppies less than 16 weeks of age should be fed at least three times daily with a nutritionally balanced, age appropriate diet.*
- 9 *Orphaned and pre-weaned puppies should be fed under the direction of a veterinary surgeon or in accordance with the WMP.*
- 10 *If puppies do not gain weight, the Person in Charge should seek the advice of a veterinary surgeon and act as directed by them. Puppies should be provided with continual access to clean water, from three weeks of age.*
- 11 *It is recommended that greyhounds over the age of 16 weeks are each provided with their own food receptacle.*
- 12 **Puppies must have a preventative health plan, devised in conjunction with the veterinary surgeon. This should be recorded in the individual dog's health record and should include vaccinations against:**
 - i) *Canine Distemper;*
 - ii) *Infectious Canine Hepatitis (adenovirus);*
 - iii) *Leptospirosis;*
 - iv) *Canine Parvovirus;*
 - v) *Canine Cough (parainfluenza (Type II)) and;*
 - vi) *Bordetella Bronchiseptica.*
- 13 **A control program for internal and external parasites must be carried out at regular intervals from two weeks of age as agreed by the veterinary surgeon in the written health plan.**
- 14 **If detected, puppies must be treated promptly for any internal and external parasites (e.g. worms, fleas and ticks) and this recorded in their individual health record.**
- 15 *All vaccinations should be administered and certified by the veterinary surgeon.*



PART 5: REARING

- 1 *If it is necessary to transport a litter of puppies before weaning they should travel together.*
- 2 *The rearing regime should aim for greyhounds to become successful racing greyhounds, but also prepare them for the transition to companion animals, following appropriate preparation for retirement and rehoming as outlined in this Code.*
- 3 **From three weeks old, puppies must be carefully and positively introduced to events likely to be encountered throughout their adult lives, in racing kennels and tracks and post-retirement.** *These should include different surfaces, wearing a collar and a muzzle and walking on a lead; separation from their litter (in the company of a handler); standard racing and training facilities including starting boxes; different environments (e.g. reserves, parks, shopping areas, local sporting grounds); travelling in cars and vans; grooming and teeth brushing; people other than their usual handlers, other dogs and breeds. These should all be introduced gradually and slowly, at a pace suited to the individual puppy.*
- 4 *Puppies should never be exposed to stimuli at such a level that they exhibit fear and anxiety.*
- 5 *Puppies should not be muzzled at any time, except as part of a habituation programme or as part of a housing acclimatisation program as detailed in the establishment's WMP.*
- 6 **Greyhounds must not be permanently separated from their mother before seven weeks** and should not be before eight weeks of age unless the health of the puppies is at risk or the female is showing signs of stress. *Advice from a veterinary surgeon should be sought if there are any concerns for the welfare of the puppies or mother.*
- 7 *If puppies are to be reared on the same site, it is recommended those from the same litter are housed together with their mother until they are 12 weeks of age.*
- 8 *Puppies should be frequently and closely monitored, at least every four hours, when housed together and if fighting, bullying or other adverse welfare outcomes are identified, they should be separated.*
- 9 **Rearing accommodation must always provide protection from adverse weather: sun, cold and rain.**
- 10 **Puppies must be provided with toys and games and opportunities for mental stimulation.**
- 11 **Puppies must be given access to areas to run and play off leash every day.** *Until puppies are of an appropriate age to be lead walked, they should have at least four opportunities to engage in play and human interaction during the day.*
- 12 **Puppies must also be provided with opportunities for socialisation with dogs, a variety of people and other animals, so they can develop into well adjusted and happy dogs.** *They should be introduced to a wide variety of people including different ages, sexes and ethnicities as well as people wearing a variety of clothing e.g. helmets, glasses and hats.*
- 13 *From 12 weeks, greyhounds should be provided with gradually increasing exposure to housing similar to where they will later live, including if appropriate, separation from other dogs.*
- 14 *When in indoor housing, greyhounds should be provided with toilet breaks every two to three hours to build familiarity with race kennel routine.*
- 15 *Gradual habituation to vehicles is vital to reduce transport stress. This should be commenced by 14 weeks of age and continued so that the greyhound is used to being transported by the time it is first schooled or exported.*
- 16 *If during rearing, any offspring are found to have a heritable defect, a neutering and sale*

or rehoming plan should be developed in conjunction with a veterinary surgeon and all details about the heritable defect and likely outcomes for the greyhounds fully disclosed to their owners and any prospective purchasers.

17 *Greyhounds between four and six months of age should be fed a minimum of twice daily with a nutritionally balanced diet.*



PART 6: TRAINING AND SCHOOLING

- 1 All reasonable steps must be taken to ensure that greyhounds do not pursue or attack any live animals.**
- 2 Live animals must never be used in the training of racing greyhounds.**
- 3 Deceased animal parts should not be used in the training of racing greyhounds.*
- 4 Lures used to train greyhounds should be made of a synthetic material only and should not be animal-derived.*



Image: AWWN

PART 7: SALE OF GREYHOUNDS

- 1** *Buyers should be provided with all registration details.*
- 2** *Greyhounds should only be sold when both parties have each other's full addresses and contact details.*
- 3** *If to be sold at a sales trial, dogs should be checked by a veterinary surgeon both pre- and post-trial and declared fit for sale.*
- 4** *If imported prior to sale (e.g. from Ireland), it is recommended that dogs are examined and declared fit by a veterinary surgeon prior to sale.*



Image: AWWN

PART 8: TRANSPORTATION

For dogs used in the racing industry, it is likely that the law will regard most transport journeys as 'commercial' and consequently subject to the Welfare of Animals Transport Order (WATO) (Wales) 2007¹⁵ - and also to EU legislation number 1/2005¹⁶. The conditions suggested in these guidelines should help transporters comply with WATO and 1/2005 but more information can be found at: <https://gov.wales/welfare-animals-during-transport>

Anyone transporting more than two greyhounds on journeys in excess of 65km (40 miles) should complete and return an Animal Transporter Authorisation form. Copies can be obtained directly from the Welsh Government website.

- 1 *Before dogs are transported, they should be confirmed to be fit and healthy for the intended journey, by someone suitably trained and competent.*
- 2 **Greyhounds must be transported in a way that does not cause injury or unnecessary suffering.**
- 3 *Transport methods should prevent escape and undue stress, and allow transportation in the shortest practicable time.*
- 4 *The transport of distressed dogs, i.e. those showing signs of intense or prolonged fear and anxiety should be avoided whenever possible.*
- 5 **Persons handling greyhounds must be competent and must not use punitive methods e.g. shouting, hitting or other methods likely to cause fear, injury or suffering.**
- 6 **Greyhounds must be transported in a way which prevents distraction of the driver and minimises risk of injury to themselves, to other greyhounds or occupants in the vehicle.**
- 7 **Dogs must be securely and comfortably confined during a journey.** *If transporting in the main body of a vehicle, dogs should be restrained with a suitable belt or harness.*
- 8 *Dogs which are injured and/or diseased should not be transported (except for minor illness or injury as determined by trained and competent staff), unless to a veterinary surgery or under veterinary advice.*
- 9 *Transport vehicles should allow injured animals to lie fully stretched out safely.*
- 10 **Long journeys must be planned so they have minimal impact on a dog's feeding regime. Dogs must not be fed immediately before travelling.**
- 11 *Whenever possible, dogs should be fed two to four hours before a journey and should be exercised to stimulate elimination immediately before loading, and after unloading.*
- 12 **Water and opportunities to toilet must be provided on a regular basis.** *Road journeys should incorporate breaks at least every three*

¹⁵ <https://gov.wales/welfare-animals-during-transport>

¹⁶ <https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32005R0001>

hours, to allow the dogs to be inspected, to offer them water and should only recommence after 30 minutes, to allow water to be absorbed. Inspections should occur more frequently if advised by a veterinary surgeon.

- 13 If placing a dog in a cage or crate this must allow the dogs to sit erect, lie down in a natural position, stand and turn around in a natural position without contacting overhead structures.**
- 14 Cages or crates should be large enough to transport an injured greyhound.
- 15 Dogs should always have bedding (blankets, duvets or vet bedding) if transported in a crate or cage.
- 16 All transport vehicles, cages or trailers used to transport greyhounds should be constructed

of materials and be of a design that minimises the risk of injury to the dog, e.g. with no sharp edges or abrasive surfaces.

- 17 Dogs must not be left in a vehicle where the temperature may pose a risk to them.**
- 18 Any vehicle used for transportation should have the correct ventilation and temperature control so that temperature remains between 10°C and 26°C and the dogs remain comfortable during the journey whatever the outside temperature.
- 19 Greyhounds should not be loaded after racing, schooling or trialling, for at least 15 minutes, to allow them to cool.
- 20 If dogs are to be transported by air, IATA rules must be followed¹⁷.**



PART 9: TRAINER'S RESIDENTIAL KENNELS OR OTHER LIVING ACCOMMODATION

a. Living accommodation and environment

- 1 **Living accommodation must be of substantial construction and must provide protection from the weather. It must be safe, secure and free from hazards.**
- 2 *All accommodation and places where dogs are left unattended should be free from potential choking hazards.*
- 3 **Travel crates or cages must not be used as living accommodation.**

Accommodation design

- 4 **The living accommodation must consist of a separate sleeping area and activity area.**
- 5 *The design and layout of accommodation should allow dogs to be able to control their*

own visual access to their surroundings and other dogs. This can be achieved in two ways; (i) providing areas that the dog can move into to avoid visual contact with other dogs, and (ii) providing raised areas, e.g. a platform to enable visual contact.

- 6 *The layout of accommodation should minimise the number of dogs which staff disturb when removing any one individual and should ensure the safety of staff when passing other dogs with a dog on a leash. For example, staff can minimise disturbance by choosing a route which passes the fewest dogs.*
- 7 *Electrical appliances (e.g. heaters and lamps) should be well maintained and always be out of reach of the dogs.*

Accommodation size

- 8 **As a minimum, the size of the accommodation used to house greyhounds must be:**

Number of adult dogs	If dogs have continual access during daylight hours to an adjacent exercise area	If dogs do not have continual access during daylight hours to an exercise area
1	4.5sqm	6.5sqm
2	6.0sqm	8.5sqm

- 9 **As well as meeting the minimum size, the living accommodation must be sufficiently large to allow each dog to be able to walk, turn around and wag its tail without touching the sides of the kennel, to stretch, and to lie out flat.**
- 10 *Roof height (outside a sleeping area) should allow greyhounds to stand on their hind legs with their front paws raised above their heads.*
- 11 **When housing multiple dogs in a single unit, the accommodation must be large enough to allow adequate resources to avoid competition and monopolisation in the kennel, e.g. this includes sufficient hiding places, platforms, beds, toys, etc for each dog.**

Bedding/furniture

- 12 **Dogs must always have access to a safe hiding place where they can escape to if they feel afraid.** This can be the sleeping area within a kennel, an open crate or under a sleeping platform.
- 13 **Every dog must be provided with their own comfortable space with clean bedding where they can go rest and sleep and which must be in a quiet place. The rest/sleeping area must be large enough for the greyhound to lie down completely stretched out.**
- 14 **Bedding must be provided to all dogs and should be in sufficient volume to make the surface warm and soft to be non-irritant and to provide thermal and musculoskeletal comfort.**
- 15 **Bedding must be regularly cleaned so that it is kept clean, dry and parasite free and should be made of a material that is easily washable or disposable.**
- 16 *When bedding is destroyed it should be replaced.*

Lighting

- 17 **There must be adequate light in the living accommodation, so that all parts are clearly visible to the carers.**

- 18 *All accommodation should provide the greyhounds with continuous access to natural light during the day. Where this isn't possible, dogs should be provided with a predictable light/dark cycle which corresponds to external day and night.*

Temperature

- 19 **At all times, there must be some part of the living space where the dog can experience temperatures above 10°C (50°F) and below 26°C (79°F). Insulation, heating and/or automatic cooling/ventilation must be provided if necessary, to attain this.**
- 20 **Dogs must not be restricted to areas when climatic conditions may cause them distress.**
- 21 *Dogs should be monitored to check if they are too hot or too cold. If an individual dog is showing signs of heat or cold intolerance, steps need to be taken to ensure their welfare.*

Noise

- 22 *Measures to avoid high levels of noise should be explored and implemented. For example, the avoidance of metal bowls, minimising the disturbance of other dogs.*

- 23 *If there is a lot of ambient noise, then buildings or kennels should be sound insulated.*
- 24 *Loud music may be stressful and so should be avoided but soothing background music e.g. classical can be beneficial and so it is recommended that this is provided.*

Ventilation/humidity

- 25 *Ventilation in indoor accommodation of all dogs should provide sufficient fresh air of an appropriate quality and to keep down the levels and spread of odours, noxious gases (for example ammonia should not exceed 5ppm), dust and infectious agents of any kind, and to provide for the removal of excess heat and humidity.*
- 26 *Where greyhounds are housed in a totally enclosed area, and forced ventilation is the only form of air movement, there should be a minimum of eight changes per hour.*
- 27 *The ventilation system should be designed to minimise harmful draughts and noise disturbance.*

Outdoor areas

- 28 **Outdoor areas must be safe and secure, free from hazards and** *should be away from their main accommodation.*
- 29 **Fencing for outdoor areas must be sufficiently high and well maintained to prevent greyhound escape, injury and** *should prevent unsafe contact between greyhounds in adjoining areas.*
- 30 **Outdoor areas must be cleaned of all faeces at least daily and** *should be cleaned immediately after the removal of a greyhound(s) and before new greyhounds are introduced to the area.*
- 31 *Outdoor areas should be suitably drained to prevent pooling of liquids.*

- 32 *Whenever possible, trained and competent staff and other dogs should be present when dogs have access to an outdoor area, as this will encourage dogs to explore, interact and play.*

- 33 **Animals must not be restricted to outdoor areas under climatic conditions which may cause them distress. They need constant access to shade and shelter so they can avoid rain, wind or direct sunlight and need constant access to fresh, clean water.**

- 34 *Grassed sections should form part of large outdoor runs, but should be adequately maintained to reduce the risk of disease and parasites and not allowed to deteriorate into bare earth. Sand runs are acceptable, in particular for winter. Where artificial turf is used, it should be well maintained to ensure it does not pose a hazard.*

b. Diet

Food and water

- 1 **All greyhounds must be fed once a day and** *should be fed twice a day unless advised otherwise.*
- 2 **Food must be provided in sufficient quantity and of nutritional quality, appropriate to meet the daily requirements for the condition, health, reproductive status, weight, level of activity, age and size of the greyhound.**
- 3 **Feed intake must be monitored daily** *and any change in eating habits should be recorded. Advice should be sought from a veterinary surgeon if an unexplained increase or loss of appetite persists.*
- 4 *Where dogs are in-appetent for longer than 24 hours they should be monitored and if there is concern(s) veterinary advice sought.*
- 5 **The body condition/weight of the dogs must be monitored regularly** *(this should*

be at least weekly) and food supplied in sufficient amounts to achieve and maintain an appropriate body condition as per the Body Condition Score Chart in Appendix A to this Code. If uncertain about quantities and types of food to feed, veterinary advice should be sought.

- 6 Dogs which display significant weight loss or gain must be seen by a veterinary surgeon and treated as appropriate.**
- 7 Greyhounds must have continuous access to a sufficient supply of fresh clean water unless advised otherwise by a veterinary surgeon. This must be from a clean and suitable container.**
- 8 Water intake must be checked daily and advice from a veterinary surgeon should be sought if there is excessive or a lack of drinking.**
- 9 Food should be provided in a clean food receptacle, except where providing food as enrichment in a treat ball or chew/food toy, or when providing bones.*
- 10 Feeding and drinking receptacles should be capable of being cleaned and disinfected, and this done regularly.*
- 11 Dogs should not be fed raw offal unless it is with the knowledge of a veterinary surgeon, recorded in the WMP and in conjunction with a complete worming program.*
- 12 All food should be removed before the next feed.*
- 13 Food should be stored appropriately in sealed containers, which are vermin proof, cool and dry or refrigerated if appropriate according to the manufacturer's directions.*
- 14 There must be suitable and hygienic facilities for the storage and preparation of food.**
- 15 Hot and cold water must be available for washing utensils and eating and drinking vessels.**

16 Where fresh and cooked meat is stored, refrigeration facilities must be used.

17 An onsite food supply, sufficient for five days, should be available in the case of an emergency event such as illness (for the Person in Charge), accident or large-scale emergency.

Feeding regime

18 Dogs must not be fed food stuffs known to be toxic such as grapes, raisins and onions.

19 Dogs should not be fed milk as a regular part of their diet.

20 Diets should be planned to avoid foods with high salt or tannins, for example, tea and gravy.

21 Greyhounds are reported to be susceptible to bloat (gastro-dilatation-volvulus). Feeding smaller, more frequent meals is believed to reduce this risk, as is feeding from a raised food receptacle and not be exercised immediately after eating. These feeding practices are recommended.

22 Any new food should be introduced gradually, over at least a week, to allow the dog to adjust to it.

Supplements and substances

23 Dogs should never be given substances intended to have short term effects on their racing ability.

24 Supplements and substances aimed to improve health and ensure a balanced diet should only be administered as directed by a veterinary surgeon and detailed in WMP.

25 Any supplements and substances should be clearly and individually labelled and kept in their original container or packaging. Any damaged containers and/or labels should be retained and kept with decanted or re-stored product.

- 26 All expired supplements and substances should be stored and disposed of according to relevant legislative requirements.
- 27 The Person in Charge should keep records of all supplements and substances provided to each greyhound, and these records should be signed off at least annually by a veterinary surgeon.
- 28 Dogs should be given access to suitable objects to chew to aid their dental health.
- 29 Oestrus suppression should be achieved only by veterinary approved products and under the advice of a veterinary surgeon and protocols should be detailed in the WMP.

c. Behaviour

Exercise

- 1 **Dogs must be provided with an opportunity to exercise away from their home accommodation at least once a day.** *This should be for a total of at least half an hour and an hour is recommended. This can be off lead in an outdoor area or on lead.*
- 2 **If keeping dogs indoors, they must have access to an appropriate outside place, away from their resting and feeding area, which they can use as a toilet regularly and this should be at least every four hours.**

Toy and feeding enrichment

- 3 **Dogs must be provided with appropriate toy and/or feeding enrichment unless veterinary advice states otherwise.**
- 4 **Items must be checked daily to ensure they are clean, safe and replaced when necessary.**
- 5 *Enrichment should be provided daily and should encourage natural behaviour and prevent the development of abnormal behaviours.*

Monitoring of behaviour

- 6 **Staff must be familiar with, and able to recognise, signs of stress, fear and anxiety and to determine whether the dog is experiencing good or poor welfare.**
- 7 **The behaviour of all dogs must be monitored daily.** *Changes in behaviour which suggest suffering, stress, fear, anxiety and aggression (see below) should be recorded and acted upon. These behaviours when repeated or prolonged can indicate that a dog's welfare is compromised.*
- 8 **The behaviours listed below can also be signs of stress, pain or illness. In such cases veterinary advice must be sought and if advised the advice of a suitably qualified clinical animal behaviourist.**
- i) cowering – crouching down with low body posture;
 - ii) shaking/shivering/trembling- rapid uncontrollable muscular tremors, as if cold;
 - iii) tucked tail – tail placed low between legs;
 - iv) ears back – pinnae of ears flat to sides of head;
 - v) avoidance – dog retreat from stimuli;
 - vi) disengaging/ loss of focus – unresponsive to usually rewarding stimuli;
 - vii) freezing in response to stimulus – becomes suddenly motionless in response to event, object or person;
 - viii) hypervigilance – extremely watchful and responsive to potential danger;
 - ix) muscle tension – appears rigid and not relaxed;
 - x) panting when it's not hot – rapid open mouth breathing with tongue hanging out of mouth;

- xi) yawning – fully opening mouth with ears back while inhaling and closing while exhaling;
- xii) teeth chattering – mouth opens and closes rapidly with upper and lower jaw making contact with one another;
- xiii) lip smacking – audibly making contact between upper and lower lips;
- xiv) lip licking – protruding of tongue from mouth, to lick nose or side of mouth;
- xv) cheek puffing – dog blows air in to the pouches in the side of its face;
- xvi) unresponsive dilated pupils – black centre of eye is larger than usual and fails to change size;
- xvii) salivation – drooling heavily so that saliva is visible around mouth;
- xviii) paw lifting – raising one fore-leg above the ground;
- xix) coprophagy – eating own faeces;
- xx) chewing the housing – using teeth to grind an object (e.g. bedding or bars).

- 9 *If a dog develops repetitive behaviours (e.g. over-grooming, pacing, circling, licking the walls, prolonged barking or howling) efforts should be made to change its environment to add interest and reduce the behaviours.*
- 10 *Where multiple dogs within an establishment show signs of stress, for example repetitive behaviours, the housing and husbandry routines of the establishment should be reviewed to try to ameliorate this.*

Handling, training and training devices

- 11 **All people responsible for greyhounds must interact with them in a kind, gentle and**

consistent way. People must not be allowed to frighten, scare or worry dogs.

- 12 **Electric shock devices are illegal in Wales and must not be used.**
- 13 **Training methods and equipment must protect dogs from pain, suffering and injury.**
- 14 **Methods based on the application of something unpleasant including choke chains and spray collars must be avoided when training and reward-based methods used instead.**
- 15 **Equipment for handling and training must fit comfortably and not cause irritation or pain.**

Husbandry

- 16 **Dogs must always have access to a dry, clean area, and should be able to avoid wet floors after cleaning. Heating and air flow should be adequate to allow floors to dry rapidly.**
- 17 *Dogs should be removed from their kennels for thorough cleaning that involves hosing.*

d. Companionship

Group or separate housing

- 1 *Whenever possible dogs should be housed in pairs or small groups.*
- 2 **When dogs are kept together they must be compatible. Some minor and temporary signs of fear and/or aggression may occur during initial mixing. Dogs which display severe or persistent signs of aggression towards (e.g. biting, chasing, pinning down or blocking movement), avoid and/or are fearful of other dogs must not be housed together.**
- 3 *Decisions on which dogs can be pair or group housed should be made by suitably competent staff.*

- 4 *New pairs should be gradually introduced under the supervision of competent staff in a neutral environment where they can avoid one another if they so choose.*
- 5 **Pair and group housed dogs must have sufficient space and adequate resources to minimise competition and monopolisation and to be able to move away from one another if they chose.**
- 6 **While unsupervised, greyhounds must be safe from attack, stress or injury from other greyhounds, animals or people.**
- 7 *As a general principle, dogs should not be muzzled in kennels to facilitate pair or group housing. There may be specific circumstances where it is necessary for them to be muzzled when unsupervised for a limited period e.g. overnight. This should not exceed three days. Under no circumstances should muzzling be used as a long-term strategy to keep dogs together.*
- 8 **Dogs who cannot be housed with other dogs due to behavioural concerns and are kept individually must have alternative means of enrichment including (if appropriate) additional appropriate human contact above that stated in human company.**
- 9 **For dogs who value each other's company, but where accommodation is unsuitable for pair- or group-housing, regular opportunities to interact and exercise with other dogs must be provided.**
- 10 *Female greyhounds in, or near to oestrus, should not be housed with or within olfactory contact with entire male greyhounds nine months or older.*
- 11 **Basket muzzles are acceptable, but other types must not be used as they prevent drinking and panting which are essential for hydration and temperature regulation.**
- 12 *Muzzles should be introduced in a gradual and positive way and ideally as part of habituation during rearing (see Part 5).*
- 13 *Greyhounds should not be muzzled for more than 30 minutes at a time unless:*
- i) *under strict, documented, direction by a veterinary surgeon;*
 - ii) *as part of a housing acclimatisation program as detailed in the establishment's WMP.*
- 14 *Any veterinary direction for muzzle use on a specific dog should be reviewed at least annually.*
- 15 **Human company**
- 16 **Dogs must have adequate opportunities for contact with people and at least daily. This can include grooming, exercise, playing, petting and training but at a level suitable for the individual dog.**
- 17 **All staff must strive for a positive relationship with all dogs and avoid negative interactions.**
- 18 **Dogs must be handled in a kind, gentle and positive way. They should not be shouted at, pushed or hit.**
- 19 **Staff must be able to identify dogs that are fearful and anxious as well as those that are relaxed and calm.**

Muzzling

- 11 *Muzzling protocols should be stipulated in the WMP.*
- 12 *Any muzzle used should be a secure and comfortable fit and allow dogs to pant, drink and vomit.*

Staff training/competency

- 21 **There must be sufficient personnel available every day to ensure that the daily welfare needs of the greyhounds are provided for.**

22 *All staff responsible for the care of greyhounds should complete appropriate training and education to be competent when handling greyhounds and to maintain the skills and/or experience necessary to comply with this Code.*

23 *Until the required training is complete, establishment staff should work under the direct supervision of person(s) with suitable experience and/or qualifications.*

e. Healthcare

1 **All staff must be familiar with, and able to recognise signs of illness, injury and disease.**

2 **Veterinary advice must be promptly sought if a dog is showing signs of ill health, including (but not exhaustive of) lethargy, a change of behaviour, signs of pain, repeated sneezing or coughing, breathlessness, loose faeces (if prolonged), constipation or difficulty passing urine, vomiting or diarrhoea, lameness or inability to stand or walk, bleeding or swelling of body parts, significant weight change over a short period, lack of appetite, drinking more or less than usual, unusual swellings, apparent pain, fits or staggering, wounds, discharge from ears or eyes, irritation or inflammation, significant or unusual hair loss, or repeated scratching and shaking of the head.**

3 **Greyhounds diagnosed with clinical dental disease must receive dental treatment as directed by a veterinary surgeon.**

4 *Any health issues identified should be recorded and evidence provided to the inspecting officer that a treatment plan was devised in conjunction with a veterinary surgeon and implemented.*

Monitoring of health

5 **All dogs must have, at the very least, a daily visual inspection to check for signs of illness and should be a physical inspection.**

6 **If any signs of significant health issues or unusual behaviour are detected, advice must be sought from a veterinary surgeon without delay. This should be recorded in the dog's health record.**

7 *It should be checked daily that dogs are eating and drinking, are able to defecate and urinate normally, are able to move about freely and without pain, and that their skin, teeth and coat are in a normal condition.*

8 *Health checks should take place weekly that include weighing, assessing body condition, inspecting teeth and coat condition.*

9 *All individual health records should be kept for at least a year.*

10 *Faecal consistency should be monitored daily and if loose faeces are detected, the diet gradually changed, and potential irritants sequentially removed to try to ameliorate this, and if unsuccessful, veterinary attention sought.*

Preventative healthcare

11 **A preventative healthcare plan must be agreed and should be written in consultation with a veterinary surgeon and form part of the WMP. It should include vaccination, internal and external parasite control, monitoring of weight and body condition scores. This should be recorded in the establishment's WMP.**

12 **Each establishment must be registered with a veterinary practice.**

13 *All greyhounds should receive an annual general health check (including dental check) by a veterinary surgeon (or more frequently as required).*

14 **A comprehensive vaccination programme, including vaccination against canine distemper, adenovirus, leptospirosis and parvovirus, and ideally kennel cough must be put in place and must be given in accordance with veterinary advice and manufacturer's instructions.**

- 15 It is recommended that greyhounds receive an annual vaccination for Canine Cough (ideally a combined (parainfluenza (Type II) and Bordetella bronchiseptica (intra-nasal vaccine)) that could occur at the time of their annual health check.
- 16 **Vaccination records must be kept for each dog and puppies and be up to date.** *The Person in Charge should ensure that vaccination certificates, including dates of next treatment, details of the treatment required and a record of who administered the treatment, are signed by a veterinary surgeon at each vaccination, and kept for a minimum of five years.*
- 17 **A control program for internal and external parasites must be carried out at regular intervals, as recommended by a veterinary surgeon, and in accordance with the manufacturer's instructions.**
- 18 **If detected, dogs must be treated promptly for any internal and external parasites (e.g. worms, fleas and ticks) and this recorded in their individual health record.**
- 19 **Preventative and curative healthcare provided to individual dogs, must be documented in their individual health record.**
- 20 **All greyhounds must be groomed regularly by brushing or bathing, whichever is necessary.** *This should be at least weekly and more if required to ensure the coats are kept in good, clean condition.*
- 21 *All greyhounds should have their toenails checked at least once a month and trimmed as required to prevent overgrowth.*
- 22 **Care of greyhound's teeth must be part of their management schedule.** *All dogs should have their teeth brushed with a dog specific toothbrush and paste, at least weekly and ideally daily.*

Treatment

- 23 **Prescription medications must be prescribed for the individual dog and used according to the veterinary advice;** *their use should be recorded in the dog's individual record.*
- 24 **Non-prescription medications must be used in accordance with the WMP and as agreed by a veterinary surgeon.**
- 25 *Medicines should be stored safely at the correct temperature and securely to safeguard against unauthorised access.*
- 26 *All courses should be completed in accordance with veterinary direction.*
- 27 **A greyhound's keeper is legally responsible to seek prompt veterinary treatment for any ill or injured dog.**
- 28 *If greyhounds are kept in an establishment away from their owners, the owner(s) should authorise the provision of necessary emergency veterinary treatment in their absence and it is recommended they sign an agreement for each greyhound.*

Hygiene

- 29 **All places dogs have access to must be kept clean and free from accumulated dirt and dust to minimise disease transmission and to ensure dogs are comfortable.**
- 30 **Cleaning schedules must be adequate for the purpose of disease control and protecting the well-being of the dogs and should be implemented and displayed outlining daily, weekly, monthly cleaning and disinfection duties.**
- 31 **Cleaning must incorporate a recognised formulation which is safe, suitable and effective against pathogens responsible for dog diseases. Disinfectants must be virucidal as well as bacteriocidal and should be Government approved¹⁸.**

- 32 *Cleaning and disinfection products should be used as per the manufacturer's instructions and people using these products should be competent in their safe use.*
- 33 *Cleaning products should be kept out of reach of animals.*
- 34 *The programme of cleaning should be included in the WMP developed with veterinary advice.*
- 35 *Where dogs are kept in kennels or pens, each should be inspected at least daily and kept in a clean condition.*
- 36 *Faeces should be removed at least twice daily from accommodation which houses adult greyhounds – in the case of housing puppies, faeces should be removed more frequently and at least four times a day.*
- 37 *Kennels should be disinfected at least once a week and when a dog permanently leaves the kennel.*
- 38 *Disinfection of living areas using Defra approved disinfectants, should be carried out:*
- i) *after an outbreak of an infectious disease;*
 - ii) *prior to the introduction of a new greyhound;*
 - iii) *prior to whelping; and*
 - iv) *upon the removal of puppies.*

Isolation facilities

- 39 **Appropriate isolation in self-contained facilities must be available for the care of sick, injured or potentially infectious dogs (separated by an impervious barrier and/or at least 10m).**
- 40 **Dogs in the isolation facility must be checked regularly** and unless other staff are available need to be visited after all other dogs.
- 41 *The establishment should make provision for the isolation of sick/injured/infectious animals as well as those that might be expected to be*

carrying serious infectious diseases. These provisions should be detailed in the WMP.

- 42 *Where the isolation facility is provided by the establishment's veterinary practice, a letter should be provided stating that they are agreeable to providing such facilities.*
- 43 *Dogs showing signs of infectious disease should not be allowed in shared outdoor spaces.*
- 44 *When handling dogs in isolation facilities, protective clothing and footwear should be worn and sanitation protocols followed.*
- 45 *Separate feeding and water receptacles, bedding and cleaning utensils should be stored in the facility.*

Biosecurity

- 46 *Establishments should have a biosecurity plan in place.*

This plan should include as a minimum:

- *Isolation;*
 - i) *use of isolation facilities*
 - ii) *daily disinfection*
 - iii) *use of separate cleaning equipment*
 - iv) *disposal of bedding and excreta*
 - v) *use of separate food and water bowls*
 - vi) *use of foot baths*
 - vii) *environmental enrichment*
- *Paddocks;*
 - i) *use of separate paddocks*
 - ii) *restricted contact with other greyhounds and animals*
 - iii) *restricted access to other paddocks*
 - iv) *restricted access to the public and non-kennel staff*
 - v) *cleaning, disinfection and excreta removal*
- *Transport;*

- Staffing;
 - i) allocated staffing
 - ii) use of personal protective equipment including foot covers and gloves and gowns
 - iii) animal handling
 - iv) staff hygiene
 - v) frequency of observations
- Disposal of Carcasses.
 - iv) details of the dog's diet and related requirements;
 - v) consent forms;
 - vi) a record of the date or dates of each dog's most recent vaccination, worming and flea treatments;
 - vii) details of any medical treatment each dog is receiving.

Record Keeping

47 The establishment should keep a register of all dogs and individual information about each of them. It should include the following information although this list is not considered exhaustive:

- i) the dates of each dog's arrival;
- ii) each dog's name, age, sex, neuter status, microchip number and description;
- iii) details of each dog's relevant medical and behavioural history, including details

Identification (see also Part 3)

48 All dogs must be microchipped and should be easily identifiable, for example using a collar and name tag.

49 There should be a system in place to ensure the correct identification of the dogs kept at the establishment.

50 Accommodation should be clearly and permanently numbered and needs to carry a notice that details relevant information.



Image: Nerys Royal

PART 10: RACE AND TRIALLING MEETINGS

The following conditions are based on ‘The Welfare of Racing Greyhound Regulations (England) 2010¹⁹ which are intended to safeguard the welfare of racing greyhounds while present at the race track. They include provisions for veterinary attendance and facilities, kennels, identification and recording of racing greyhounds and injuries.

a. Veterinary attendance at the track

- 1 *An appropriately trained veterinary surgeon should be in attendance at the track and at sales trials prior to the start of racing (and in good time to perform the duties set out in this Code), throughout racing and until 15 minutes after the last race has finished.*
- 2 *The veterinary surgeon and track officials should meet prior to the first race and racing should only take place if all agree that the track is in suitable conditions and hazard free.*
- 3 *If there is any unusual accident or adverse climatic conditions during a meeting, the veterinary surgeon and officials should liaise and ensure all agree before racing continues. It is recommended that either has the right to insist that racing stops on climatic and/or welfare grounds.*
- 4 *The veterinary surgeon should physically examine every dog prior to racing, checking that body condition is appropriate, the dog is not lame, inspecting their teeth and females for oestrus.*
- 5 *The veterinary surgeon should observe every race.*
- 6 *The veterinary surgeon should observe every dog leaving the track after racing.*
- 7 *The veterinary surgeon should carry out post-race physical inspection on any dog involved in a collision, or other incident or suspected to be lame on leaving the track.*

b. Facilities for veterinary surgeon

- 1 *The attending veterinary surgeon should have access to either a room or a mobile facility which:*
 - i) *is clean and has walls and floors with an impervious and easily cleanable surface;*
 - ii) *is lockable;*
 - iii) *is well-lit;*
 - iv) *has heating and ventilation;*
 - v) *has hot and cold running water;*
 - vi) *has an examination table suitable for examining greyhounds;*
 - vii) *has a lockable cupboard suitable for the storage of veterinary medicines;*
 - viii) *has a fridge suitable for the storage of veterinary medicines;*
 - ix) *is located close enough to the area where a race or trial or sales trial is being undertaken to allow quick access in the case of an emergency;*
 - x) *has a freezer suitable for the storage of greyhound carcasses;*
 - xi) *contains a crate or kennel, for use in emergency veterinary cases.*
- 2 *It is strongly recommended that the veterinary surgeon should have sufficient supplies to carry out emergency treatment and euthanasia of multiple dogs at the meeting should this be required.*

c. Management of the dogs at the track

- 1 Owners must not enter dogs that are not fit or healthy to race.**
- 2 Racing should not take place in temperatures of 28°C and above unless:**
 - i) greyhounds attending the track are transported in air-conditioned vehicles; and*
 - ii) accommodated in an area of the track where temperatures can be kept at between 10°C and 26°C; and*
 - iii) the track has in place rapid cooling mechanisms to cool greyhounds after a race such as air conditioned cooling rooms.*
- 3 Greyhounds under the age of 15 months should not run in any race or trial. The age of a greyhound is as the first day of the month in which they were whelped.**
- 4 Female greyhounds in or close to oestrus should not be trialled or raced, as this can cause frustration to surrounding males.**
- 5 Each dog should be warmed up pre-race, and warmed down after racing.**
- 6 Each dog should have their feet (and muzzle if needed) cleaned for removal of sand post-racing.**
- 7 If a greyhound has not raced for six months, or was involved in an incident in their last race, they should undergo trialling and be confirmed to be fit by the veterinary surgeon and track officials prior to racing competitively.**
- 8 If a greyhound has not raced for six months or more for any reason, it should be checked by a veterinary surgeon before participating in a trial or race.**
- 9 It is recommended that dogs are placed in the traps in which they are deemed comfortable running and they are not moved more than one trap position since their last race.**

d. Identification

- 1 Only greyhounds identified with a microchip and registered on the track database should be permitted to race.**
- 2 Every greyhound entered into a trial or race should be checked by the track official and/ or veterinary surgeon to ensure that they are identifiable with a microchip.**

e. Record keeping

- 1 Any injuries or lameness sustained at the track, and any treatments received should be recorded on the track database and records kept in accordance with GDPR legislation.**
- 2 The record should include: identification of the greyhound, the nature of the injury sustained, details of any treatment administered, the distance of the race or sales trial in which the injury occurred and the date of the injury. This information must be kept by the track operator in accordance with data protection legislation.**
- 3 It is recommended that the records are analysed at least monthly and trends in injury occurrence identified and used to inform decisions about track management to minimise future incidents.**

f. Track kennelling

- 1 Where kennels are provided, they must be:**
 - **sufficiently large to allow dogs to move and lie down without touching the sides or roof, and to be able to avoid any urine or faeces;**
 - **secure** so that no substances can be given to the dogs;
 - **naturally lit and well-ventilated.**
- 2 If dogs are to remain in transport vehicles pre-or post-race, the area in which the dog**

stays, must be large enough to allow the dog to turn around and lie stretched out.

- 3 The temperature where the dogs stay must remain within 10°C and 26°C.
- 4 Water must be continually available to all dogs.

g. Treatment of illness and injuries sustained during racing

- 1 When a greyhound becomes ill or is injured in a racing event, veterinary advice must be sought immediately.
- 2 *If a veterinary surgeon or other racing official has previously imposed a period of incapacitation (following injury), a dog should only race again once that period has passed, or*

it has been declared fit by a veterinary surgeon and completed a trial.

- 3 *The injury should be recorded (see Part 10e).*

h. Track management

- 1 All materials integral to the race track including barriers, traps, surfaces and the hare must be designed and maintained in such a way to prevent injury and/or harm to racing greyhounds.
- 2 If record analysis suggests that trends in injury occurrence may be associated with aspects of track management, it is recommended that management protocols should be amended in an effort to minimise future incidents, and the effects monitored closely.



PART 11: LEAVING THE INDUSTRY

1 When a greyhound leaves the industry by any route, the reason, route of exit and name of rehoming centre or private owner and cause of death, if appropriate, should be recorded in the track database.

a. Retirement

1 It is the joint responsibility of the breeder, owner and trainer to ensure that, when a greyhound leaves the industry, each and every dog has the best opportunity of being rehomed and is able to enjoy a happy and healthy life. This includes undertaking all reasonable efforts to prepare the greyhound for rehoming as well as appropriate socialisation and behavioural training with a certified, suitably qualified, trainer.

2 It is strongly recommended that rehoming is undertaken using a reputable organisation, which is a member of the Association of Dogs and Cats Homes²⁰ and plans and preparation for the dog's retirement start as early as possible.

3 If a greyhound is rehomed before completing a preparation program, the registered owner should provide information to the greyhound's new owner or temporary carer about the health and behaviour of the greyhound at the time of adoption and details of the attempts made to prepare the dog for rehoming.

b. Rehabilitation/Behavioural modification

1 During their racing career, dogs should gradually be introduced to new places, to ease the later transition post-retirement.

2 Prior to rehoming, greyhounds should be taught to spend time calmly alone, as this can prevent the development of separation-related problems, they should gradually be exposed to increasing periods alone which can be part of race crate training or other training activities.

3 Any time dogs spend alone, should be experienced as positive for example, by providing a preferred long-lasting food item or toy. If the greyhound is stressed and doesn't settle then the carer should end the session and in the next session, the greyhound should be left alone for a shorter time, so they do not become distressed.

4 Before being rehomed to a member of the public, greyhounds should each be exposed to a pre-planned process of graduation including introduction to sights, sounds and experiences they are likely to encounter in the home and shown to be relaxed in their presence.

5 This should include:

- i) walking on a lead;
- ii) quiet and busy streets;
- iii) a variety of people including children;
- iv) household appliances.

6 Exposure should be gradual, and calm behaviours rewarded.

7 If dogs fail to habituate to specific stimuli and continue to exhibit fear, they should be referred to a qualified clinical animal behaviourist. (www.abtcouncil.org.uk).

c. Rehoming

1 All retired greyhounds whose health and temperament has been assessed as suitable for rehoming (by the trainer, owner, veterinary surgeon and a rehoming charity representative should be rehomed to a suitable home) or given to a shelter or rehoming charity or kept as a pet. The ADCH can provide information about local rehoming charities.

2 It is accepted that muzzles may sometimes need to be used for retired greyhounds, especially shortly after retirement. If used correctly, these can be useful tools to allow safe exercise, whilst training is ongoing.

- 3 It is recommended that any organisations and individuals rehoming greyhound to members of the public should fully brief and provide educational materials on the individual's welfare needs including advice on managing behaviour and easing the transition into a domestic environment.
- 4 *All greyhounds should be neutered prior to being rehomed.*
- 5 *All retired racing greyhounds being sold, given away or transferred should be accompanied with a health, welfare and management statement. Details of any known physical abnormality (including injury) at the time of sale or transfer, any treatment the greyhound is receiving or requires, how that abnormality may affect the short and long-term health and welfare of the greyhound, and their vaccination certificates should be included.*
- 6 *The racing authorities should be informed of the change of ownership and the microchip company.*
- 7 *Whenever possible, it is recommended that compatible kennel pairs are rehomed together.*
- iii) *the greyhound is found to be unsuitable for rehoming (by the trainer, owner, veterinary surgeon and a rehoming charity representative) and confirmed following temperament and behavioural testing conducted by a clinical animal behaviourist.*
- 3 *Veterinary surgeons should provide the registered owner with a Euthanasia Certificate once a greyhound has been euthanised.*
- 4 *Whenever possible, euthanasia should be performed in an area that is separate from any greyhound housing area and out of view and olfactory contact with other greyhounds, and view of the general public.*
- 5 *If a racing greyhound dies other than through euthanasia, the person responsible should obtain an opinion from a veterinary surgeon to determine the cause of death, whether through examination or post mortem.*

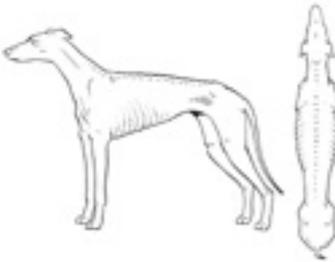
d. Euthanasia

- 1 *If greyhounds are kept in an establishment away from their owners, the owner(s) should pre-authorise the provision of emergency euthanasia in their absence and it is recommended they sign an agreement for each greyhound.*
- 2 *Euthanasia should be performed on the advice of, and by a veterinary surgeon, and when:*
 - i) *the greyhound's pain, distress or suffering cannot be adequately controlled;*
 - ii) *the health or welfare of the greyhound is compromised to such an extent that the likelihood of achieving an enjoyable life is low; or*

This code was developed using a legacy bequeathed to the RSPCA to improve the welfare of racing greyhounds. The funding secured the services of Dr Nicola Rooney who co-wrote this code with Dr Samantha Gaines, Head of Companion Animal Science and Policy, RSPCA on behalf of the Greyhound welfare working group, a sub-group of the Animal Welfare Network for Wales (AWNW).

APPENDIX A: BODY CONDITION SCORE CHART

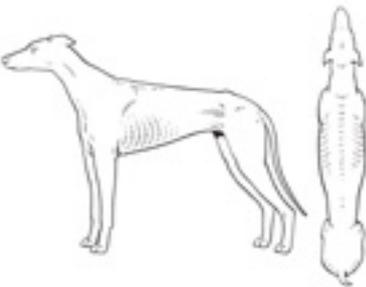
1. Emaciated



- i) Individual ribs, spine and pelvis prominent and evident from a distance.
- ii) Lack of muscle mass.
- iii) Little or no body fat.
- iv) Rump hollow.
- v) Waist prominent when viewed from above.
- vi) Abdomen obviously tucked up.
- vii) Neck thin.
- viii) No fat on tail.

Veterinary advice must be sought.

2. Thin



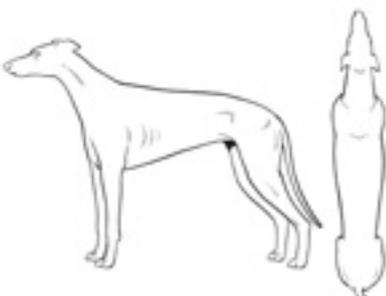
- i) Ribs, spine and pelvis bones visible and easily felt.
- ii) Little body fat.
- iii) Neck thin.
- iv) Abdomen tucked up.
- v) Little fat on tail.

Obvious waist when viewed from above. Increase feeding and worm dog if not wormed recently (ensure all-wormer used – some products do not cover all worms).

Seek veterinary advice if dog remains underweight or unsure of feeding or worming regime.

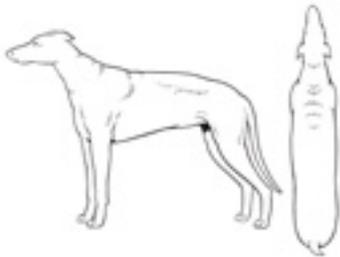
Racing greyhounds have a condition score halfway between thin and ideal.

3. Ideal



- i) Ribs and spine can be felt, last few ribs may be visible.
- ii) Dog should have a waist when viewed from above.
- iii) Belly is tucked up when viewed from side.
- iv) Good muscle mass.
- v) Rump well-muscled.

4. Overweight

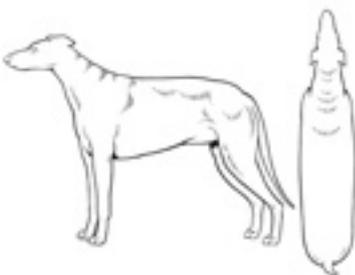


- i) Ribs and spine not visible but can be felt.
- ii) Fat deposit on tail.
- iii) Little or no waist when viewed from above, rounded appearance, back appears broadened.
- iv) Dog squarish along back line when viewed from side.
- v) Abdomen not tucked up, may appear rounded underneath.

Reduce feed intake or provide lower calorie feed. Increase exercise.

Seek veterinary advice if unsure of appropriate diet or concerns over exercise regime.

5. Obese



- i) Ribs and spine not visible and difficult to feel.
- ii) Tail has obvious fat deposit.
- iii) No waist and back broadened when viewed from above.
- iv) Belly obviously rounded and possibly distended.
- v) Dog square or rounded up along back line when viewed from side.

Seek veterinary advice on diet and exercise regime.



COD YMARFER GWIRFODDOL:
LLES MILGWN
SY'N RASIO (CYMRU)
Pack Page 231

RHAGAIR

Pwrpas y Cod hwn yw egluro'r hyn y mae angen i'r rheiny sy'n gyfrifol am les milgwn rasio yng Nghymru ei wneud er mwyn cyrraedd y safon gofal sy'n ofynnol yn ôl y gyfraith, yn ogystal ag annog mabwysiadu safonau uwch. Er mwyn cynnig arweiniad clir, ysgrifennwyd y cod mewn modd sy'n gwahaniaethu'n glir rhwng gofynion sydd eisoes yn bodoli yn y ddeddfwriaeth gyfredol (wedi'u nodi fel "rhaid") a safonau arfer gorau gwirfoddol (wedi'u nodi fel "dylid").

Bwriad y Cod yw ymdrin â phob cam yng nghylch bywyd milgi, h.y. o'i eni hyd at ei farwolaeth. O'r herwydd, mae'r Cod yn berthnasol trwy gydol oes ei ac yn enwedig wrth adael y diwydiant.

Y gofynion hynny a nodwyd yn **rhaid**, er nad ydynt wedi'u codi air am air, yw'r rhai y mae Rhwydwaith Lles Anifeiliaid Cymru (AWNW) yn eu hystyried yn bwysig er mwyn cydymffurfio â darpariaethau deddfwriaethol sy'n cynnwys:

- 1 Deddf Lles Anifeiliaid 2006¹.
- 2 Cod Ymarfer Llywodraeth Cymru er Lles Cŵn².
- 3 Rheoliadau Lles Anifeiliaid (Coleri Electronig) (Cymru) 2010³.
- 4 Rheoliadau Microsglodynnu Cŵn (Cymru) 2015⁴ a Rheoliadau Lles Anifeiliaid (Bridio Cŵn) (Cymru) 2014⁵.
- 5 Deddf Rheoli Cŵn 1992⁶.
- 6 Deddf Lles Milgwn 2010⁷.

Argymhellir yn gryf bod unigolion sy'n gyfrifol am filgwn sy'n rasio yn gwirio'r ddeddfwriaeth

drostynt eu hunain i sicrhau eu bod yn gyfarwydd â'r gofynion.

Mae defnyddio *dylid* yn dangos gofynion yn ymwneud â milgwn rasio sy'n seiliedig ar ddarpariaethau mewn deddfwriaeth a chodau gorfodol y tu hwnt i Gymru a chanllawiau arfer da sy'n cynnwys:

- 1 Rheoliadau Lles Anifeiliaid (Trwyddedu Gweithgarwch sy'n cynnwys Anifeiliaid) (Lloegr) 2018⁸.
- 2 Cod Ymarfer Gorfodol ar gyfer Lles Anifeiliaid (Cadw a Bridio Milgwn Rasio yn Nhiriogaeth Prifddinas Awstralia) 2018⁹.
- 3 Rheoliadau Rasio Bwrdd Milgwn Prydain Fawr (GBGB) 2018¹⁰.
- 4 PAS 251:2017 Manyleb ar gyfer cytiau cenel i hyfforddwy milgwn¹¹.
- 5 Canllawiau arfer da yr RSPCA ar gyfer lles cŵn wedi'u hatafael¹².

Yn ogystal, ceir gofynion a chanfyddiadau ymchwil diweddar sy'n arbennig o berthnasol i'r diwydiant milgwn, ac mae'r awduron a'r gweithgor yn cytuno eu bod yn dangos arfer da.

Trwy gydol y Cod, ceir argymhellion ynghylch arfer gorau i annog y rheiny sy'n gweithio gyda milgwn rasio i fabwysiadu'r safon gofal uchaf posibl. Nodir y rhain gan ofynion sy'n dechrau gydag 'Argymhellir bod...'

¹ <https://www.legislation.gov.uk/cy/ukpga/2006/45/contents>

² <https://llyw.cymru/y-cod-ymarfer-er-lles-cwn>

³ <https://www.legislation.gov.uk/cy/wsi/2010/943/contents/made>

⁴ <http://www.legislation.gov.uk/cy/wsi/2015/1990/contents/made>

⁵ <http://www.legislation.gov.uk/cy/wsi/2014/3266/contents/made> Sylwer: mae'r mater a yw'n ofynnol i berson gydymffurfio â'r rheoliadau bridio ai peidio yn dibynnu a yw'n ofynnol iddynt feddu ar drwydded fridio ai peidio. Argymhellir yn gryf bod unigolion sy'n gyfrifol am filgwn sy'n rasio yn gwirio'r ddeddfwriaeth drostynt eu hunain i sicrhau eu bod yn gyfarwydd â'r gofynion.

⁶ <https://www.legislation.gov.uk/ukdsi/2018/9780111165485/schedule/1?view=plain>

⁷ <https://www.legislation.gov.uk/ukdsi/2010/543/contents>

⁸ <https://www.legislation.gov.uk/ukdsi/2018/9780111165485/schedule/1?view=plain>

⁹ https://www.act.gov.au/_data/assets/word_doc/0006/1194306/Code-of-Practice-2018-Racing-Greyhounds.docx Er bod y cod hwn wedi'i lunio ar gyfer rasio milgwn yn Nhiriogaeth Prifddinas Awstralia, caiff ei ddefnyddio trwy'r cod hwn gan ei fod yn seiliedig ar dystiolaeth.

¹⁰ <https://www.gbgb.org.uk/rules-regulation/rules-of-racing/>

¹¹ <https://www.bsigroup.com/en-GB/about-bsti/news-and-press-releases/2018/january/New-specification-for-care-of-racing-greyhounds-launched/>

¹² <http://politicalanimal.org.uk/wp-content/uploads/2015/04/RSPCA-Guide-The-welfare-of-seized-dogs-in-kennels.compressed.pdf>

Dylech fod yn ymwybodol bod y ddeddfwriaeth a ddyfynnir yn y Cod a'i Atodiadau yn gywir ar y dyddiad cyhoeddi, ond gall newid wedi hynny. Nid yw'r rhagair hwn yn rhan o'r Cod, ond bwriedir iddo egluro pwrpas ac amcanion cyffredinol y Cod. Yn yr un modd, nid yw'r Atodiadau sy'n rhoi sylw i'r gofynion cyfreithiol perthnasol ychwaith yn rhan o'r Cod.

Bwriad y Cod Ymarfer yw sicrhau bod y rheiny sy'n gyfrifol am les milgwn rasio yn cyrraedd y safon ofynnol yn ôl deddfwriaeth a'u bod yn cael eu hannog i fabwysiadu'r safonau gofal uchaf posibl.

DIFFINIADAU

At ddibenion y ddogfen hon, diffinnir milgi rasio fel ci sy'n cael ei fridio, ei fagu, ei gadw, ac/neu ei ddefnyddio at ddibenion y diwydiant rasio.



Llun: Nerys Royal



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RHAN 1: CANLLAWIAU CYFFREDINOL

- 1 **Rhaid peidio â chadw anifeiliaid bychain (megis cwningod, ysgyfarnogod, llygod, moch cwta, cathod ac ati) mewn ardaloedd lle mae gan filgwn rasio fynediad corfforol, gweledol neu arogleuol iddynt.**
- 2 *Dylai pob sefydliad sy'n bridio, magu, rasio neu'n lletya milgwn fod â Chynllun Lles a Rheoli (WMP) ar gyfer materion gweithredol cyffredinol ac ar gyfer rheoli milgwn, eu lles, eu cymdeithasoli, eu cyfoethogi a'u haddysg (fel y bo'n briodol).*
- 3 *Dylai'r Cynllun amlinellu unrhyw brotocolau sy'n wahanol i'r gofynion a amlinellir yn y Cod hwn a dylid eu hadolygu'n flynyddol. Pan na chaiff protocolau eu nodi, mae'r gofynion a amlinellir yn y Cod hwn yn berthnasol.*
- 4 *Os oes gan sefydliad sawl Person â Chyfrifoldeb, yna dylai'r Cynllun nodi'r Person â Chyfrifoldeb sy'n gyfrifol am bob ardal o'r sefydliad neu ran o'r Cynllun, gan gynnwys ardaloedd a rennir / cyffredin.*
- 5 *Dylai milfeddyg gymeradwyo'r Cynllun i ddechrau arni, ac yna bob tair blynedd wedi hynny. Os bydd y milfeddyg sy'n cefnogi'r sefydliad yn newid, dylid rhoi copi o'r Cynllun i'r milfeddyg newydd cyn gynted â phosibl.*
- 6 *Dylid gosod larymau tân a darparu offer ymladd tân, gan eu cynnal a'u cadw yn dda a hyfforddi staff sut i'w defnyddio.*
- 7 *Dylai milfeddyg wneud archwiliad o bob sefydliad sy'n cadw milgwn o leiaf unwaith y flwyddyn.*
- 8 *Ar gyfer pob safle lle caiff cŵn eu cadw i ffwrdd o fan preswyl eu gofalwr neu eu perchennog, dylid arddangos rhif cyswllt brys wrth y fynedfa allanol. Dylid arddangos yn glir y cynllun gwacáu brys ynghyd â gweithdrefn petai tân.*
- 9 *Dylid arddangos manylion cysylltu â'r filfeddygfa ynghyd â'i lleoliad er mwyn i'r holl staff fedru gweld y wybodaeth. Dylai hyn gynnwys darpariaethau y tu allan i oriau swyddfa arferol.*
- 10 *Dylid cael ffôn waith yn yr adeilad pryd bynnag y bydd staff yno, a'i bod ar gael i gysylltu â'r gwasanaethau brys.*

RHAN 2: BRIDIO

a. Dewis cŵn ar gyfer bridio

- 1 Ni ddylai pâr bridio fod yn perthyn yn agos, er enghraifft, tad a merch; brawd a chwaer; mam a mab. Ni ddylai paru perthynas ar yr ach agosaf nac ychwaith paru ar yr ail ach (er enghraifft, taid ac wyres).
- 2 Ni ddylid cadw milgwn ar gyfer bridio os gellir disgwyl yn rhesymol (ar sail eu genoteip, ffenoteip neu gyflwr iechyd) y gallai bridio ohonynt gael effaith niweidiol ar eu hiechyd neu eu lles eu hun, neu iechyd yr epil. Yn ogystal ag ystyried iechyd corfforol, ni ddylid cadw cŵn at ddibenion bridio os ydynt yn ymddwyn yn ofnus tu hwnt.
- 3 Argymhellir yn gryf bod pob milgi bridio yn cael eu profi'n enetig am unrhyw ddiffygion etifeddol cyn eu defnyddio i fridio, os yw prawf effeithiol a dibynadwy ar gael yn fasnachol. Os yw gofawr yn ansicr pa brofion sy'n berthnasol, dylent ymgynghori â milfeddyg. Ni ddylid bridio o unrhyw filgwn yn y sefydliad sy'n cario genynnau ymgiliol ar gyfer unrhyw nam etifeddol sy'n achosi afiechyd neu anhwylder.
- 4 Os oes gan unrhyw epil ddiffyg etifeddol, yna dylai'r Person sydd â Chyfrifoldeb am yr epil hwnnw ddatblygu cynllun iechyd ac ysbaddu ar y cyd â milfeddyg, a dylid datgelu'n llawn yr holl fanylion am yr anhwylder etifeddol ac unrhyw effeithiau tebygol ar y milgi i'w perchnogion cofrestredig ac unrhyw ddarpar brynwyr.
- 5 Os hysbysir Person â Chyfrifoldeb bod milgi a werthwyd ganddo wedi cael diagnosis gan filfeddyg fel un sydd â nam etifeddol, dylent roi'r gorau i fridio o rieni'r milgi hwnnw hyd nes:
 - i) bod o leiaf un o'r rhieni wedi cael eu profi am y nam etifeddol, os yw'r rhiant hwnnw'n dal i gael ei ddefnyddio ar gyfer bridio a bod prawf derbyniol ar gael. Os nad oes prawf derbyniol ar gael, dylai milfeddyg asesu o leiaf un o'r rhieni am y nam etifeddol;
 - ii) bod epil eraill y rhieni hynny sy'n dal yn y sefydliad yn cael eu profi am y nam etifeddol, os yw prawf derbyniol ar gael.

- 6 Rhaid i filgi a miliast fod yn 12 mis oed o leiaf, a dylent fod yn 18 mis oed o leiaf, cyn eu gwasanaeth cyntaf.
- 7 Dylai unrhyw gi y bwriedir ei fridio gael archwiliad iechyd cyffredinol gan filfeddyg cyn ei wasanaeth cyntaf i benderfynu a yw'n aeddfed yn gorfforol ac yn addas at ddibenion bridio.
- 8 Dylid asesu iechyd miliast fagu o fewn pedair wythnos cyn ei pharu.
- 9 Dylai'r Person â Chyfrifoldeb gael tystysgrif gan y milfeddyg i nodi bod y milgi, ar adeg yr archwiliad, yn iawn i'w fridio.
- 10 Rhaid i filiast beidio â chael mwy na chwe thorllwyth/torraid yn ystod ei hoes ac ni ddylai gael mwy na phedwar oni bai iddi gael ei harchwilio gan filfeddyg sydd o'r farn na fydd cynhyrchu torllwyth arall yn niweidiol i'w hiechyd neu ei lles.
- 11 Rhaid i filiast beidio â rhoi genedigaeth i fwy nag un dorllwyth o gŵn bach mewn cyfnod o 12 mis (ac ni ddylai esgor ar fwy nag un bob 18 mis).
- 12 Ni ddylid bridio o ast os yw dros chwe blwydd oed.
- 13 Rhaid i bob milgi bridio gael mynediad dyddiol i ardal awyr agored ddiogel lle gallant wneud ymarfer corff, chwarae, ymwneud â chŵn eraill ac archwilio eu hamgylchedd. Dylai hyn fod am o leiaf 30 munud y dydd.
- 14 Ni ddylid cadw miliast sydd yn cwana neu sy'n agos at y cyfnod hwnnw mewn cyswllt arogleuol â milgwn gwrywaidd naw mis neu'n hŷn.

b. Cyplu (gan gynnwys ffrwythloni artiffisial)

- 1 Dylai parau sy'n paru'n naturiol gael eu gwahanu oddi wrth anifeiliaid eraill a'u goruchwyllo wrth iddynt baru.
- 2 Ni ddylid rhoi milgi gyda mwy nag un ast ar unrhyw adeg at ddibenion paru naturiol.

- 3 Ni ddylid defnyddio stand bridio neu baru cŵn (sy'n cyfyngu ar allu'r ast i symud neu droi a thrwy hynny wrthwynebu gael ei chyplu).
- 4 Os yw'r milgi yn aflonyddu'n ormodol ar y filiast, dylid ei symud hi a gofyn am gyngor milfeddyg.
- 5 Ar ôl y cyplu, dylai'r ddau filgi gael eu gwahanu, eu hasesu am arwyddion anaf, a chael triniaeth lle bo angen.
- 6 Ni ddylid defnyddio milgi fwy na 14 gwaith y mis, gan gynnwys paru naturiol, ffrwythloni ac echdynnu semen.
- 7 Dylai miliast aros amser priodol ar ôl paru blaenorol, yn ôl cyfarwyddyd milfeddyg.
- 8 **Milfeddyg yn unig sydd i wneud unrhyw ffrwythloni artiffisial traws-serfigol.**
- 9 **Os ffrwythlonir drwy'r wain, rhaid i berson sydd wedi'i hyfforddi'n briodol wneud hyn, ond argymhellir mai milfeddyg yn unig sy'n ei wneud.**
- 5 Ni ddylid rhoi unrhyw feddyginiaethau presgripsiwn i ast sy'n esgor oni bai bod hynny o dan gyfarwyddyd milfeddyg.
- 6 Os sylwir ar unrhyw beth anarferol neu os oes pryderon am les y filiast neu'r cŵn bach yn ystod y broses esgor, dylid holi am gyngor milfeddyg ar unwaith.
- 7 **Os oes angen, rhaid i filfeddyg berfformio toriad Cesaraidd a rhaid rhoi anesthesia priodol a lleddfu'r boen.**
- 8 Dylai gofal ar ôl llawdriniaeth toriad Cesaraidd gynnwys lleddfu poen yn ddigonol a'i wneud yn unol ag union gyfarwyddiadau'r milfeddyg.
- 9 Dylai'r Person â Chyfrifoldeb gael cyngor milfeddygol ysgrifenedig ynghylch gofal i filiast ar ôl toriad Cesaraidd gan gynnwys protocolau ymarfer corff.
- 10 **Rhaid i ofalwyr milgwn ofyn am gyngor milfeddygol os bydd cymhlethdodau yn codi ar ôl llawdriniaeth.**

c. Geni cŵn bach

- 1 O leiaf saith diwrnod cyn ei dyddiad esgor (oni bai bod tebygolrwydd o roi straen arni neu ei hanafu), dylid symud miliast feichiog i ardal esgor, sef man sy'n ddigon mawr i roi modd iddi ymddwyn yn naturiol ac i orffwys oddi wrth y dorllwyth.
- 2 Ni ddylai'r ardal esgor ynysu'r ast a'r dorllwyth o olwg, sŵn nac arogl geist cyfarwydd eraill a chysylltiad dyddiol â phobl.
- 3 Dylid darparu ardal o fewn yr ardal esgor lle gall yr ast orffwys i fwrdd oddi wrth ei chŵn bach.
- 4 Cyn gynted ag y bydd y filiast yn dangos arwyddion esgor, dylid darparu deunydd gwely ffres iddi a dylid monitro'r ast a'r cŵn bach newydd-anedig drwy'r adeg gan rywun sydd â phrofiad o broses esgor normal ac sydd â'r gallu i adnabod unrhyw ddigwyddiadau annormal ar unwaith ac i fynd ar ofyn cyngor milfeddyg.
- 11 Ar ôl i'r esgor ddod i ben, dylai'r Person â Chyfrifoldeb neu staff eraill wneud y canlynol:
 - i) monitro'r filiast a'i chŵn bach o leiaf bob tair awr am y 48 awr gyntaf, a phob chwe awr wedi hynny nes bod y cŵn bach yn bwydo'n iawn a bod y fam yn gadarn wedi'u derbyn; cynnal archwiliad o iechyd y cŵn bach cyn pen 12 awr ar ôl yr esgor;
 - ii) glanhau'r man esgor a newid yr holl ddeunydd gwely, cyn pen 24 awr.
- 12 Dylai'r deunydd gwely fod yn ddiogel i'r cŵn bach heb greu perygl o'u mygu, neu o wasgu'r cŵn bach o dan haenau lluosog.
- 13 **Rhaid gafael mewn cŵn bach yn rheolaidd ychydig ar ôl eu geni (o fewn wythnos), am gyfnodau byr i'w cael i arfer â chyswllt dynol ac i'w harchwilio am unrhyw arwyddion o anaf, salwch neu afiechyd ac i sicrhau eu bod yn magu pwysau (gweler hefyd Rhan 5: Magu).**

14 Dylid bwydo milieist sy'n feichiog ac yn llaetha o leiaf ddwywaith y dydd, a hynny â bwyd o ansawdd maeth priodol, ac mewn maint digonol, i ddiwallu eu hanghenion neu eu bwydo o dan gyfarwyddyd milfeddyg.

15 Dylai miliast gael archwiliad iechyd cyffredinol gan filfeddyg o fewn 8 wythnos ar ôl esgor.

16 Ni ddylai miliast gymryd rhan mewn treialu na rasio am o leiaf ddeg wythnos ar ôl esgor.

Dylai'r Person â Chyfrifoldeb gael tystysgrif gan filfeddyg i nodi bod y filiast yn iach ar ôl esgor, cyn iddi ddychwelyd i rasio.

17 Ni ddylai milieist gael mwy na dau doriad Cesaraidd, ond argymhellir un toriad Cesaraidd yn unig, ac ar ôl hynny ni ddylid eu paru ac yn ddelfrydol dylid eu hysbaddu.



Llun: Debra Allen

RHAN 4: CYFNOD LLAETHA

- 1 Dylai'r monitro ar filieist sy'n llaetha gynnwys cadw golwg yn rheolaidd ar y canlynol o leiaf bob pedair awr:
 - i) y cŵn bach yn bwydo;
 - ii) llaetha'r filiast;
 - iii) os yw'n berthnasol, monitro clwyfau Cesaraidd am gochni, chwyddo a rhedlif.
- 2 Dylid gwaredu'r deunydd gwely budr, a rhoi deunydd gwely glân bob dydd yn ystod y cyfnod llaetha.
- 3 Yn ystod yr wythnos gyntaf ar ôl yr esgor, dylid archwilio geist ddwywaith y dydd am fastitis a chael sylw milfeddygol ar unwaith os amheuir hyn.
- 4 Dylid sicrhau fod geist sy'n llaetha yn cael o leiaf bedwar cyfnod y dydd ar gyfer toiled ac ymarfer corff i ffwrdd o'u cŵn bach.
- 5 **Rhaid darparu gwres ychwanegol i gŵn bach newydd-anedig (megis lamp gwres sydd â 25 wat) yn yr ardal esgor am y 10 diwrnod cyntaf ar ôl genedigaeth a dylent bob amser gael mynediad i ardal sydd rhwng 26 a 28 gradd Celsius.**
- 6 Pan fydd y tywydd yn boeth, dylent hefyd gael mynediad i ardal arall oerach, er mwyn i'r fam fedru cadw tymheredd corff priodol.
- 7 Dylid darparu bwyd i gŵn bach o dair wythnos oed hyd at ddiwedd y cyfnod diddyfnu, sef y bwyd priodol i'w hoedran datblygu a hwnnw mewn cynhwysydd bwyd isel.
- 8 Dylai cŵn bach sydd wedi'u diddyfnu'n llawn sydd o dan 16 wythnos oed gael eu bwydo o leiaf dair gwaith y dydd gyda diet cytbwys o ran maeth ac sy'n briodol i'w hoedran.
- 9 Dylid bwydo cŵn bach amddifad a chyn eu diddyfnu o dan gyfarwyddyd milfeddyg neu yn unol â'r Cynllun Lles a Rheoli.
- 10 Os na fydd cŵn bach yn magu pwysau, dylai'r Person â Chyfrifoldeb ofyn am gyngor milfeddyg a gweithredu yn unol â'u cyfarwyddyd. Dylai cŵn bach gael mynediad di-dor at ddŵr glân, o dair wythnos oed.
- 11 Argymhellir bod milgwn dros 16 wythnos oed yn cael eu cynhwysydd bwyd eu hunain.
- 12 **Rhaid i gŵn bach gael cynllun iechyd ataliol, wedi'i lunio ar y cyd â'r milfeddyg. Dylid cofnodi hyn yng nghofnod iechyd pob ci unigol a dylai gynnwys brechiadau yn erbyn:**
 - i) Clefyd y Cŵn;
 - ii) Hepatitis Heintus mewn Cŵn (adenofirws);
 - iii) Leptospirosis;
 - iv) Parfofeirws y Cŵn;
 - v) Peswch Cŵn (paraffliw [Math II]) a;
 - vi) Bordetella bronchiseptica.
- 13 **Rhaid cael rhaglen reoli ar gyfer parasitiaid mewnol ac allanol yn rheolaidd o'r adeg pan fo'r cŵn yn bythefnos oed fel y cytunwyd gan y milfeddyg yn y cynllun iechyd ysgrifenedig.**
- 14 **O ganfod unrhyw barasitiaid mewnol neu allanol (e.e. llyngyr, chwain a throgod), rhaid trin cŵn bach yn syth a chofnodi hyn yn eu cofnod iechyd unigol.**
- 15 Dylai'r milfeddyg roi pob brechiad ac ardystio hynny.



RHAN 5: MAGU

- 1 Os oes angen cludo torllwyth o gŵn bach cyn eu diddychu dylent deithio gyda'i gilydd.
- 2 Dylai'r magu fod â'r nod o'u cael yn filgwn rasio llwyddiannus, ond hefyd eu paratoi ar gyfer trosglwyddo i fod yn anifeiliaid anwes, ar ôl eu paratoi'n briodol ar gyfer ymddeol ac ailgartrefu fel yr amlinellir yn y Cod hwn.
- 3 **O dair wythnos oed ymlaen, rhaid cyflwyno cŵn bach yn ofalus ac yn gadarnhaol i ddiwyddiadau y maent yn debygol o ddod ar eu traws yn ystod eu bywydau fel oedolion, mewn cenel rasio a thraciaiau ac ar ôl ymddeol.** Dylai'r rhain gynnwys gwahanol arwynebau, gwisgo coler a safnffrwyng a cherdded ar dennyn; cael eu gwahanu oddi wrth eu torllwyth (yng nghwmni hyfforddwr); cyfleusterau rasio a hyfforddi safonol gan gynnwys blychau cychwyn; gwahanol amgylcheddau (e.e. parciau, ardaloedd siopa, meysydd chwaraeon lleol); teithio mewn ceir a faniau; brwsio eu cotiau a thrin eu cyrff, brwsio dannedd; pobl eraill heblaw am eu hyfforddwr arferol, cŵn a bridiau eraill. Dylid cyflwyno'r rhain oll yn raddol ac yn araf, ar gyflymder sy'n addas i'r ci bach unigol.
- 4 Ni ddylid byth roi profiadau i gŵn bach i'r fath raddau eu bod yn dangos ofn a phryder.
- 5 Ni ddylid byth roi cŵn bach mewn safnffrwyng ar unrhyw adeg, ac eithrio fel rhan o raglen ymgyfarwyddo neu ymgynefino â llety fel y manylir yng Nghynllun Lles a Rheoli'r sefydliad.
- 6 **Rhaid peidio â gwahanu milgwn yn barhaol oddi wrth eu mam cyn eu bod yn saith wythnos oed ac ni ddylid gwneud hyn cyn wyth wythnos oed oni bai bod iechyd y cŵn bach mewn perygl neu fod y filiast yn dangos arwyddion o straen.** Dylid gofyn am gyngor gan filfeddyg os oes unrhyw bryderon am les y cŵn bach neu'r fam.
- 7 Os yw cŵn bach i gael eu magu ar yr un safle, argymhellir bod y rhai o'r un dorllwyth yn cael eu cadw gyda'i gilydd gyda'u mam nes eu bod yn 12 wythnos oed.
- 8 Dylid monitro cŵn bach yn aml ac yn fanwl, o leiaf bob pedair awr, os cânt eu cadw gyda'i gilydd ac os sylwir ar unrhyw ymladd, bwlio neu ganlyniadau lles niweidiol eraill, dylid eu gwahanu.
- 9 **Rhaid i'r man magu bob amser amddiffyn rhag tywydd garw, rhag yr haul, oerfel a glaw.**
- 10 **Rhaid darparu tegan a gemau i gŵn bach a chyfleoedd i'w hysgogi'n feddyliol.**
- 11 **Rhaid i gŵn bach gael mynediad i fannau lle gallant redeg a chwarae oddi ar dennyn bob dydd.** Hyd nes y bydd cŵn bach o oedran priodol i gerdded ar dennyn, dylent gael o leiaf bedwar cyfle i gymryd rhan mewn chwarae ac ymwneud â phobl yn ystod y dydd.
- 12 **Rhaid darparu cyfleoedd hefyd i gŵn bach gymdeithasu â chŵn eraill yn ogystal ag amrywiaeth o bobl ac anifeiliaid eraill, er mwyn iddynt ddatblygu'n gŵn hapus sy'n addasu'n dda.** Dylid eu cyflwyno i amrywiaeth eang o bobl gan gynnwys gwahanol oedrannau, rhywiau ac ethnigrwydd yn ogystal â phobl yn gwisgo amrywiaeth o ddillad e.e. helmedau, sbectol a hetiau.
- 13 O 12 wythnos oed ymlaen, dylid cyflwyno milgwn fwyfwy yn raddol i lety tebyg i ble y byddant yn byw yn ddiweddarach, gan gynnwys os yw'n briodol, eu gwahanu oddi wrth gŵn eraill.
- 14 Os ydynt mewn llety dan do, dylid rhoi amser toiled i filgwn bob dwy i dair awr er mwyn magu cynefindra â threfn cenel rasio.
- 15 Mae ymgynefino yn raddol â cherbydau yn hanfodol i leihau straen eu cludo maes o law. Dylid dechrau hyn erbyn 14 wythnos oed a'i barhau fel bod y milgi wedi arfer cael ei gludo erbyn yr amser y bydd yn mynd i'w ysgol gyntaf neu'n cael ei allforio.
- 16 Os canfyddir wrth ei fagu fod gan unrhyw gi bach ddiffyg neu nam etifeddol, dylid datblygu cynllun ysbaddu a gwerthu neu ailgartrefu ar

y cyd â milfeddyg a dylai'r perchnogion ac unrhyw ddarpar brynwyr gael gwybod yn llawn am holl fanylion y nam etifeddol a'r effeithiau tebygol ar y milgi.

17 *Dylid bwydo milgwn rhwng pedwar a chwe mis oed o leiaf ddwywaith y dydd â diet sy'n gytbwys o ran maeth.*



RHAN 6: HYFFORDDI A DYSGU

- 1 Rhaid cymryd pob cam rhesymol i sicrhau nad yw milgwn yn erlid nac yn ymosod ar unrhyw anifeiliaid byw.**
- 2 Rhaid peidio byth â defnyddio anifeiliaid byw wrth hyfforddi milgwn rasio.**
- 3 Ni ddylid defnyddio rhannau anifeiliaid sydd wedi marw wrth hyfforddi milgwn rasio.*
- 4 Dylai abwyd a ddefnyddir i hyfforddi milgwn gael ei wneud o ddeunydd synthetig yn unig ac ni ddylai ddeillio o anifeiliaid.*



Llun: AWWW

RHAN 7: GWERTHU MILGWN

- 1 Dylid rhoi'r holl fanylion cofrestru i brynwyr.*
- 2 Ni ddylid gwerthu milgwn oni bai fod gan y ddwy ochr gyfeiriadau llawn a manylion cyswllt ei gilydd.*
- 3 Os ydynt i'w gwerthu mewn treial gwerthu, dylai milfeddyg roi archwiliad i gŵn cyn ac ar ôl y treial a datgan eu bod yn ffit i'w gwerthu.*
- 4 Os cânt eu mewnforio cyn eu gwerthu (e.e. o lwerddon), argymhellir bod cŵn yn cael eu harchwilio a'u datgan yn ffit gan filfeddyg cyn eu prynu.*



Llun: AWWW

RHAN 8: CLUDO MILGWN

O ran cŵn a ddefnyddir yn y diwydiant rasio, mae'n debygol y bydd y gyfraith yn ystyried y rhan fwyaf o'u teithiau cludo yn rhai 'masnachol' ac o ganlyniad yn ddarostyngedig i Orchymyn Lles Anifeiliaid (Cludo) (Cymru) 2007¹⁵ - yn ogystal ag i ddeddfwriaeth yr UE rhif 1/2005¹⁶. Dylai'r amodau a awgrymir yn y canllawiau hyn helpu cludwyr i gydymffurfio â'r Gorchymyn uchod ac 1/2005 ond gellir dod o hyd i ragor o wybodaeth yn: <https://llyw.cymru/lles-anifeiliaid-wrth-gludo>

Dylai unrhyw un sy'n cludo mwy na dau filgi ar deithiau dros 65km (40 milltir) lenwi a dychwelyd ffurflen Awdurdodaeth Cludwyr Anifeiliaid. Gellir cael copïau yn uniongyrchol o wefan Llywodraeth Cymru.

- 1 Cyn cludo cŵn, dylid cadarnhau eu bod yn ffit ac yn iach ar gyfer y siwrnai a fwriadwyd, gan berson perthnasol sydd wedi'i hyfforddi'n gymwys.*
- 2 Rhaid cludo milgwn mewn ffordd nad yw'n achosi anaf na dioddefaint diangen iddynt.**
- 3 Dylai'r dulliau cludo atal y ci rhag dianc ac atal rhoi gormod o straen arno, yn ogystal â rhoi modd ei gludo yn yr amser byrraf yn ymarferol.*
- 4 Dylid osgoi cludo cŵn sydd mewn trallod, h.y. y rhai sy'n dangos arwyddion o ofn a phryder dwys neu hirfaith, pryd bynnag y bo hynny'n bosibl.*
- 5 Rhaid i'r bobl sy'n trin ac yn gafael yn y milgwn fod yn gymwys a rhaid iddynt beidio â defnyddio dulliau cosbi e.e. gweiddi, taro neu ddulliau eraill sy'n debygol o achosi ofn, anaf neu ddioddefaint.**
- 6 Rhaid cludo milgwn mewn ffordd sy'n atal tynnu sylw'r gyrrwr ac yn lleihau'r risg o anaf iddo'i hun, i'r milgwn neu eraill yn y cerbyd.**
- 7 Rhaid i gŵn fod wedi'u cau i mewn yn ddiogel ac yn gyfforddus yn ystod taith.** Os cânt eu cludo ym mhrif gorff cerbyd, dylid cael gwregys neu harnais addas ar y cŵn.
- 8 Ni ddylid cludo cŵn sydd wedi'u hanafu ac/neu eu heintio (ac eithrio mân salwch neu anaf fel y'u pennir gan staff cymwys a hyfforddedig), heblaw am eu cludo i filfeddygfa neu o dan gyngor milfeddyg.*
- 9 Dylai cerbydau cludo fedru gadael i anifeiliaid sydd wedi'u hanafu orwedd yn ddiogel.*
- 10 Rhaid cynllunio siwrneiau hir i gael yr effaith leiaf bosibl ar drefn bwydo cŵn. Rhaid peidio â bwydo cŵn yn union cyn teithio.**
- 11 Pryd bynnag y bo hynny'n bosibl, dylid bwydo cŵn 2-4 awr cyn siwrnai a dylid rhoi ymarfer corff iddynt i'w hysgogi i'w ysgarthu ychydig cyn eu llwytho, ac ar ôl eu dadlwytho.*
- 12 Rhaid darparu dŵr a chyfleoedd toiled yn rheolaidd.** Dylai teithiau ar y ffordd gynnwys seibiannau o leiaf bob tair awr, er mwyn rhoi modd archwilio'r cŵn, cynnig dŵr iddynt ac ni ddylid ailgychwyn am 30 munud wedyn, er mwyn caniatáu amser i amsugno'r dŵr. Dylid eu harchwilio'n amlach os cynghorir hynny gan filfeddyg.

¹⁵ <https://llyw.cymru/lles-anifeiliaid-wrth-gludo>

¹⁶ <https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32005R0001>

- 13** Os rhoddir ci mewn crât neu gawell, rhaid i hwn fod o faint digonol i adael i'r cŵn eistedd yn syth, gorwedd mewn ystum naturiol, sefyll a throï o gwmpas mewn ffordd naturiol heb gyffwrdd â'r strwythurau uwchben.
- 14** Dylai cratiau neu gewyll fod yn ddigon mawr i gludo milgi wedi'i anafu.
- 15** Dylai cŵn bob amser gael deunydd gwely (blancedi, dwfe neu ddeunydd gwely milfeddyg) os cânt eu cludo mewn crât neu gawell.
- 16** Dylid pob cerbyd cludo, cewyll neu ôl-gerbyd a ddefnyddir i gludo milgwn fod wedi'u dylunio a'u hadeiladu o ddefnyddiau sy'n lleihau'r perygl o anafu'r ci, e.e. dim ymylon miniog nac arwynebau sgraffellog.
- 17** Rhaid peidio â gadael cŵn mewn cerbyd lle gall y tymheredd fod yn beryglus iddynt.
- 18** Dylai unrhyw gerbyd a ddefnyddir i gludo cŵn fod â'r rheolaeth tymheredd a'r awyru cywir i sicrhau fod y tymheredd yn aros rhwng 10°C a 26°C a bod y cŵn yn parhau'n gyfforddus yn ystod y daith beth bynnag yw'r tymheredd y tu allan.
- 19** Ni ddylid llwytho milgwn ar ôl rasio, hyfforddi neu dreialu am o leiaf 15 munud, er mwyn gadael iddynt oeri.
- 20** Os cludir cŵn yn yr awyr, rhaid dilyn rheolau IATA¹⁷.



RHAN 9: Y CENEL Y BYDD MILGWN YN BYW YNDDO WRTH HYFFORDDI NEU LETY ARALL IDDYNT FYW YNDDO

a. Llety ac amgylchedd byw

- 1 Rhaid i'r llety byw fod yn gadarn ei strwythur a rhaid iddo amddiffyn rhag y tywydd. Rhaid iddo fod yn ddiogel, yn gadarn a heb beryglon.
- 2 Dylid sicrhau nad oes unrhyw beryglon tagu posibl ym mhob cenel/llety ac mewn mannau lle caiff cŵn eu gadael heb oruchwyliaeth.
- 3 Rhaid peidio â defnyddio cewyll neu gratiau teithio fel mannau i'r cŵn fyw ynddynt.

Cynllun y llety

- 4 Rhaid i'r man y mae'r milgi yn byw ynddo gynnwys ardal gysgu ar wahân ac ardal weithgarwch.
- 5 Dylai dyluniad a chynllun y llety adael i'r cŵn eu hunain reoli faint maent yn ei weld o'u

hamgylchedd a'u cysylltiad gweledol â chŵn eraill. Gellir cyflawni hyn mewn dwy ffordd: (i) darparu ardaloedd y gall y ci symud iddynt er mwyn osgoi cyswllt gweledol â chŵn eraill, a (ii) darparu mannau uchel, e.e. plafform i alluogi cyswllt gweledol.

- 6 Dylai cynllun llety'r cŵn sicrhau tarfu ar y nifer lleiaf â phosibl o gŵn pan fo staff yn symud unrhyw un ohonynt a dylai sicrhau diogelwch staff wrth fynd heibio i gŵn eraill gyda chi ar dennyn. Er enghraifft, gall staff geisio tarfu cyn lleied â phosibl ar y cŵn eraill trwy ddewis llwybr sy'n mynd heibio'r nifer lleiaf o gŵn.
- 7 Dylai offer trydanol (e.e. gwresogyddion a lampau) gael eu cynnal a'u cadw'n dda a dylent bob amser fod allan o gyrraedd y cŵn.

Maint y llety

- 8 Ar y lleiaf, dylai maint y mannau a ddefnyddir i gadw milgwn fod fel a ganlyn:

Nifer y cŵn sy'n oedolion	Os oes gan gŵn fynediad di-dor yn ystod oriau golau dydd i ardal ymarfer corff gyfagos	Os nad oes gan gŵn fynediad di-dor yn ystod oriau golau dydd i ardal ymarfer corff gyfagos
1	4.5 m ²	6.5 m ²
2	6.0 m ²	8.5 m ²

- 9 Yn ogystal â bod y maint lleiaf, rhaid i'r man byw fod yn ddigon mawr i ganiatáu i bob ci allu cerdded, troi o gwmpas ac ysgwyd ei gynffon heb gyffwrdd yr ochrau, gallu ymestyn, a gorwedd lawr ar ei hyd.
- 10 *Dylai uchder y to (y tu allan i'r man cysgu) ganiatáu i filgwn sefyll ar eu coesau ôl gyda'u pawennau blaen wedi'u codi uwch eu pennau.*
- 11 Wrth gartrefu mwy nag un ci mewn un uned, rhaid i'r llety fod yn ddigon mawr i ganiatáu digon o adnoddau i osgoi cystadlu a chreu monopoli yn y cenel, e.e. mae hyn yn cynnwys digon o guddfannau, llwyfannau, gwelyau, teganau ac ati ar gyfer pob ci.

Deunydd gwely/dodrefn

- 12 Rhaid i gŵn bob amser gael mynediad i guddfafan ddiogel lle gallant ddianc iddo os ydynt yn teimlo'n ofnus. Gallai hyn fod yr ardal gysgu mewn cenel, crât agored neu o dan blatfform cysgu.
- 13 Rhaid i bob ci gael ei le cyfforddus ei hun sydd â deunydd gwely glân lle gallant fynd iddo i orffwys a chysgu ac mae'n rhaid iddo fod mewn man tawel. Rhaid i'r man gorffwys a chysgu fod yn ddigon mawr i'r milgi orwedd lawr ac ymestyn ar ei hyd.
- 14 Rhaid darparu deunydd gwely i bob ci a dylai fod digon ohono i wneud yr arwyneb yn gynnes ac yn feddal heb fod yn annifyr a rhoi cysuron cyhyrysgerberbydol a gwres.
- 15 Rhaid glanhau'r deunydd gwely yn rheolaidd i'w gadw'n lân, yn sych a heb barasitiaid a dylai fod yn ddeunydd sy'n hawdd ei olchi neu ei daflu.
- 16 *Pan gaiff y deunydd gwely ei ddinistrio dylid rhoi un newydd yn ei le.*

Golau

- 17 Rhaid bod digon o olau yn y lle byw, i sicrhau bod y gofalywyr yn gallu gweld pob man.

- 18 *Dylai'r holl lety roi modd i'r milgwn gael mynediad di-dor i olau naturiol yn ystod y dydd. Os nad yw hyn yn bosibl, dylid trefnu system cylch golau/tywyllwch rhagweladwy i gŵn sy'n cyfateb i ddydd a nos ar y tu allan.*

Tymheredd

- 19 Ar bob adeg, rhaid bod rhyw ran o'r man byw y mae modd i'r ci deimlo tymhereddau uwch na 10°C (50°F) ac islaw 26°C (79°F). Os oes angen rhaid darparu inswleiddio, gwresogi ac/neu system awyru/oeri awtomatig er mwyn cyflawni hyn.
- 20 Rhaid peidio â chaethiwo cŵn i ardaloedd lle gall amodau'r hinsawdd beri gofid iddynt.
- 21 *Dylid monitro cŵn i weld a ydynt yn rhy boeth neu'n rhy oer. Os yw ci unigol yn dangos arwyddion o fethu dioddef gwres neu oerfel, mae angen cymryd camau i sicrhau eu lles.*

Sŵn

- 22 *Dylid ystyried a gweithredu mesurau i osgoi lefelau sŵn uchel. Er enghraifft, osgoi defnyddio powlenni metel, lleihau cymaint ag y bod modd cŵn eraill yn aflonyddu.*
- 23 *Os oes llawer o sŵn amgylchynol, yna dylai'r adeilad neu'r cenel gael ei inswleiddio ar gyfer sŵn.*

24 Gall cerddoriaeth uchel beri straen ac felly dylid ei hosgoi ond gall cerddoriaeth gefndir fwyn, e.e. cerddoriaeth glasurol, fod yn fuddiol ac felly argymhellir darparu hyn.

Awyru/lleithder

25 Dylai'r awyru sydd ym mhob cenel dan do i gŵn ddarparu digon o awyr iach o ansawdd priodol a dylai'r awyru hefyd gostwng lefelau a lledaeniad arogleuon, nwyon gwenwynig (er enghraifft ni ddylai amonia fod yn fwy na 5ppm), llwch a chyfryngau heintus o unrhyw fath, yn ogystal â chael gwared â gwres a gormod o leithder.

26 Pan gaiff milgwn eu cartrefu mewn man cwbl gaeëdig, ac awyru gwthiedig yw'r unig fath o symudiad aer, dylid cael o leiaf wyth newid bob awr.

27 Dylai'r system awyru gael ei dylunio i leihau drafftiau niweidiol ac aflonyddwch sŵn.

Ardaloedd tu allan

28 Rhaid i ardaloedd yn yr awyr agored fod yn ddiogel, heb beryglon ynddynt a dylent fod i ffwrdd o'u prif lety.

29 Rhaid i'r ffensys yr ardaloedd yn yr awyr agored fod yn ddigon uchel ac wedi'u cynnal a'u cadw'n dda i atal milgwn rhag dianc nac anafu eu hunain a dylai atal cyswllt anniogel rhwng milgwn mewn ardaloedd cyffiniol.

30 Rhaid glanhau'r ardaloedd awyr agored o'r holl faw cŵn o leiaf unwaith y dydd a dylid eu glanhau yn syth ar ôl symud y milgi(milgwn) a chyn gadael milgwn newydd i'r rhan honno.

31 Dylid draenio ardaloedd yn yr awyr agored yn briodol er mwyn atal hylif rhag cronni.

32 Pryd bynnag y bo modd, dylai staff hyfforddedig a chymwys yn ogystal â chŵn eraill fod yn bresennol pan fydd cŵn yn cael mynd allan i ardal awyr agored, gan y bydd hyn yn annog cŵn i archwilio, rhyngweithio a chwarae.

33 Rhaid peidio â chaethiwo anifeiliaid i ardaloedd yn yr awyr agored o dan amodau hinsoddol a allai beri gofid iddynt. Mae angen iddynt gael mynediad cyson at gysgod a lloches er mwyn iddynt fedru osgoi glaw, gwynt neu olau haul cryf ac mae angen mynediad cyson at ddŵr glân, ffres.

34 Dylai darnau â glaswellt fod yn rhan o ardal awyr agored mawr, ond dylid eu cynnal yn ddigonol i leihau'r risg o glefyd a pharasitiaid ac ni ddylid caniatáu iddynt ddirywio yn bridd noeth. Mae darnau sydd â thywod yn dderbyniol, yn enwedig ar gyfer y gaeaf. Os defnyddir glaswellt artiffisial, dylid ei gynnal a'i gadw'n dda i sicrhau nad yw'n mynd yn berygl.

b. Diet

Bwyd a dŵr

1 Rhaid bwydo pob milgi unwaith y dydd a dylid ei fwydo ddwywaith y dydd oni cheir cyngor gwahanol.

2 Rhaid darparu digon o fwyd sydd o ansawdd maeth digonol, sy'n briodol i fodloni'r gofynion dyddiol ar gyfer cyflwr, iechyd, statws atgenhedlu, pwysau, lefel gweithgarwch, oedran a maint y milgi.

3 Rhaid monitro'n ddyddiol faint o fwyd y mae'r cŵn yn ei fwyta a dylid cofnodi unrhyw newid mewn arferion bwyta. Dylid gofyn am gyngor gan filfeddyg os yw cynnydd neu leihad mewn archwaeth am fwyd yn parhau.

4 Pan fo cŵn yn awchu'n fawr am fwyd am gyfnod sy'n hirach na 24 awr dylid eu monitro ac os oes pryder(on) dylid gofyn am gyngor milfeddyg.

5 Rhaid monitro cyflwr/pwysau corff y cŵn yn rheolaidd (dylid gwneud hyn bob wythnos ar y lleiaf) a chyflenwi bwyd mewn symiau digonol i gynnal cyflwr corff priodol yn unol â Siart Sgôr Cyflwr y Corff sydd yn Atodiad A y Cod hwn. Os oes ansicrwydd ynghylch

meintiau a mathau o fwyd i'w fwydo, dylid gofyn am gyngor milfeddyg.

brys megis salwch (i'r Person â Chyfrifoldeb), damwain neu argyfwng ar raddfa fawr.

- 6 **Rhaid i filfeddyg weld ci sy'n colli neu'n ennill pwysau yn sylweddol a'u trin fel y bo'n briodol.**
- 7 **Rhaid i filgwn gael mynediad parhaus at gyflenwad digonol o ddŵr glân ffres oni bai bod milfeddyg yn cynghori fel arall. Rhaid i hwn fod mewn cynhwysydd glân ac addas.**
- 8 **Rhaid gwirio bob dydd faint o ddŵr mae'r cŵn yn ei yfed** *a dylid cael cyngor gan filfeddyg os yw'n yfed gormod neu ddim digon.*
- 9 *Dylid darparu bwyd mewn cynhwysydd bwyd glân, ac eithrio wrth ddarparu bwyd fel elfen gyfoethogi mewn pêl ddanteithion neu degan cnoi/bwyd, neu wrth roi esgyrn.*
- 10 *Dylid gallu glanhau a diheintio cynwysyddion bwyd ac yfed, a dylid gwneud hyn yn rheolaidd.*
- 11 *Ni ddylid bwydo offal amrwd i gŵn oni bai fod y milfeddyg yn gwybod am hynny, ei fod wedi'i gofnodi yn y Cynllun Lles a Rheoli a'i fod yn digwydd ar y cyd â rhaglen gyflawn i gael gwared â llyngyr.*
- 12 *Dylid symud yr holl fwyd cyn y sesiwn bwydo nesaf.*
- 13 *Dylid storio bwyd yn briodol mewn cynwysyddion wedi'u selio, yn ddiogel rhag fermin, yn oer ac yn sych neu wedi'u cadw mewn oergell os yw'n briodol yn ôl cyfarwyddiadau'r gwneuthurwr.*
- 14 **Rhaid bod cyfleusterau addas a hylan ar gyfer storio a pharatoi bwyd.**
- 15 **Rhaid bod dŵr poeth ac oer ar gael ar gyfer golchi offer a chynwysyddion bwyta ac yfed.**
- 16 **Os yw cig ffres a chig wedi'i goginio yn cael eu storio, rhaid defnyddio cyfleusterau oergell.**
- 17 *Dylid cael digon o gyflenwad bwyd ar y safle i bara am bum niwrnod, rhag ofn y ceir digwyddiad*

Trefn fwydo

- 18 **Rhaid peidio â bwydo cŵn â bwydydd y gwyddys eu bod yn wenwynig megis grawnwin, rhesins a nionod.**
- 19 *Ni ddylid rhoi llaeth i gŵn fel rhan reolaidd o'u diet.*
- 20 *Dylid cynllunio eu diet i osgoi bwydydd sydd yn llawn tannin neu halen, er enghraifft, te a greffi.*
- 21 *Adroddir bod milgwn yn tueddu i ddiodesbol bol chwyddedig (gastro dilatation-volvulus). Credir bod bwydo prydau llai, yn amlach yn lleihau'r risg hon, yn ogystal â bwydo o gynhwysydd bwyd sydd wedi'i godi o'r llawr ac ni ddylai'r ci wneud ymarfer corff yn syth ar ôl bwyta. Argymhellir yr arferion bwydo hyn.*
- 22 *Dylid cyflwyno unrhyw fwyd newydd yn raddol, dros wythnos o leiaf, er mwyn rhoi modd i'r ci addasu iddo.*

Ychwanegiadau a sylweddau

- 23 *Ni ddylid byth roi sylweddau i gŵn gyda'r bwriad iddynt gael effeithiau tymor byr ar eu gallu i rasio.*
- 24 *Dim ond yn ôl cyfarwyddyd milfeddyg y dylid rhoi ychwanegiadau a sylweddau sydd â'r nod o wella iechyd a sicrhau diet cytbwys, a dylid rhoi manylion y rhain yn y Cynllun Lles a Rheoli.*
- 25 *Dylai unrhyw ychwanegiadau a sylweddau gael eu labelu'n glir ac yn unigol a'u cadw yn eu cynhwysydd neu eu pecynnau gwreiddiol. Dylid cadw unrhyw gynwysyddion sydd wedi'u difrodi, ac/neu eu labeli, a'u cadw gyda'r cynnyrch sydd wedi tywallt neu ei ailstorio.*
- 26 *Dylid storio a chael gwared ar yr holl ychwanegiadau a sylweddau sydd wedi dod i ddiwedd eu hoes yn unol â gofynion deddfwriaethol perthnasol.*

27 Dylai'r Person â Chyfrifoldeb gadw cofnodion o'r holl ychwanegiadau a sylweddau a roddir i bob milgi, a dylai milfeddyg lofnodi'r cofnodion hyn o leiaf unwaith y flwyddyn.

28 Dylai cŵn gael mynediad at wrthrychau addas i'w cnoi i gynorthwyo iechyd eu dannedd.

29 Dim ond yn sgil cyngor milfeddyg a thrwy gynhyrchion a gymeradwyir gan filfeddyg y dylid atal gast rhag mynd i wres/cwna, a dylid manylu ar brocololau yn y Cynllun Lles a Rheoli.

c. Ymddygiad

Ymarfer Corff

- 1 **Rhaid rhoi cyfle i gŵn gael ymarfer corff i ffwrdd o'r man maent yn byw ynddo o leiaf unwaith y dydd.** Dylai hyn fod am gyfanswm o hanner awr ar y lleiaf ac argymhellir awr. Gall hyn fod oddi ar dennyn mewn ardal awyr agored neu ar dennyn.
- 2 **Os yw cŵn yn cael eu cadw tu mewn, rhaid iddynt gael mynediad i le priodol y tu allan, i ffwrdd o'u man gorffwyso a bwydo, man y gallant ei ddefnyddio fel toiled yn rheolaidd a dylai hyn fod o leiaf bob pedair awr.**

Teganau a bwyd cyfoethogi

- 3 **Rhaid rhoi teganau ac/neu fwyd cyfoethogi priodol i gŵn oni bai bod cyngor milfeddyg yn nodi fel arall.**
- 4 **Rhaid gwirio'r eitemau bob dydd i sicrhau eu bod yn lân, yn ddiogel a'u newid pan fo angen.**
- 5 *Dylid sicrhau eitemau cyfoethogi bob dydd a dylai annog ymddygiad naturiol ac atal ymddygiad annormal rhag datblygu.*

Monitro ymddygiad

- 6 **Rhaid i staff fod yn gyfarwydd ag arwyddion o straen, ofn a phryder, ac yn gallu eu**

hadnabod, a phenderfynu a yw lles ci yn dda neu'n wael.

- 7 **Rhaid monitro ymddygiad pob ci yn ddyddiol.** Dylid cofnodi a gweithredu ar newidiadau mewn ymddygiad sy'n awgrymu dioddefaint, straen, ofn, pryder ac ymddygiad ymosodol (gweler isod). Os caiff yr ymddygiadau hyn eu hailadrodd neu os ydynt yn digwydd dros gyfnod, gallant awgrymu bod perygl i les y ci.
- 8 **Gall yr ymddygiadau a restrir isod hefyd fod yn arwyddion o straen, poen neu salwch. Mewn achosion fel y rhain mae'n rhaid gofyn am gyngor milfeddyg ac os cyngorir hynny rhaid cael cyngor arbenigwr clinigol ar ymddygiad anifeiliaid sydd â chymwysterau addas.**
 - i) cyrcydu /swatio – y corff yn crymu ac yn plygu'n isel;
 - ii) ysgwyd / crynu / ysgrytian – y cyhyrau'n crynu'n gyflym heb reolaeth, fel petai'n oer;
 - iii) cynffon wedi'i chuddio – y gynffon wedi'i thynnu'n isel rhwng y coesau;
 - iv) clustiau'n ôl – adain y clustiau yn fflat wrth ochrau'r pen;
 - v) osgoi – ci yn cilio o ysgogiadau a chynryfiadau;
 - vi) ymddieithrio / colli ffocws – ddim yn ymateb i ysgogiadau sydd fel arfer yn rhoi boddhad;
 - vii) rhewi mewn ymateb i ysgogiad – yn sydyn yn peidio â symud wrth ymateb i ddigwyddiad, gwrthrych neu berson;
 - viii) gor-wyliadwriaeth – yn hynod wylidwrus ac yn barod i ymateb i berygl posibl;
 - ix) tensiwn yn y cyhyrau – i'w weld fel petai'n dynn a methu ymlacio;
 - x) ei dafod allan ac yn anadlu'n drwm pan nad yw'n boeth – anadlu'n gyflym â cheg

agored gyda'r tafod yn hongian allan o'r geg;

xi) dylyfu gen – agor y geg yn llawn gyda'r clustiau yn ôl wrth anadlu i mewn a chau'r geg wrth anadlu allan;

xii) rhincian dannedd – y geg yn agor ac yn cau'n gyflym gyda'r ên uchaf ac isaf yn cysylltu â'i gilydd;

xiii) clecian gwefusau – gallwch glywed y gwefusau uchaf ac isaf yn cysylltu;

xiv) llyfu gwefusau – gwthio'r tafod allan o'r geg i lyfu'r trwyn neu ochr y geg;

xv) chwyddo'r bochau – y ci yn chwythu aer i ochr ei wyneb i wneud ei fochau'n dew;

xvi) kannwyll y llygaid yn fawr a ddim yn ymateb – canol du y llygad yn fwy na'r arfer ac yn methu â newid maint;

xvii) glafoerio – driblan yn drwm nes bod y poer yn weladwy o amgylch y geg;

xviii) codi pawen – codi un o'i goesau blaen o'r ddaear;

xix) bwyta carthion – bwyta ei faw ei hun;

xx) cnoi'r cw b a'r adeilad – defnyddio'i ddannedd i hogi/malu gwrthrych (e.e. deunydd gwely neu fariau).

9 Os yw ci yn datblygu ymddygiadau ailadroddus (e.e. twtio a llyfu ei hun yn ormodol, cerdded yn ôl ymlaen, yn mynd rownd a rownd mewn cylchoedd, llyfu'r waliau, cyfarth neu swian am hir), yna dylid ymdrechu i newid ei amgylchedd i ychwanegu diddordeb a lleihau'r ymddygiad.

10 Pan fydd sawl ci mewn sefydliad yn dangos arwyddion o straen, er enghraifft ymddygiadau ailadroddus, dylid adolygu trefn ac arferion y llety a hwsmonaeth y sefydliad i geisio lliniaru hyn.

Trin, hyfforddi a dyfeisiau hyfforddi

11 Rhaid i bawb sy'n gyfrifol am filgwn ymwneud â nhw yn garedig, yn dyner a chyson. Rhaid peidio â gadael i bobl ddychryn, codi ofn na phoeni cŵn.

12 Mae dyfeisiau sioc drydanol yn anghyfreithlon yng Nghymru ac ni ddylid eu defnyddio.

13 Rhaid i ddulliau ac offer hyfforddi amddiffyn cŵn rhag poen, dioddefaint ac anaf.

14 Wrth hyfforddi rhaid osgoi dulliau sy'n seiliedig ar rywbeth annymunol gan gynnwys cadwyni tagu a choleri chwistrellu, gan yn hytrach ddefnyddio dulliau sy'n seiliedig ar wobrwyo.

15 Rhaid i offer ar gyfer trin a hyfforddi'r ci ei ffitio'n gyfforddus a pheidio â rhwbio neu achosi poen.

Hwsmonaeth

16 Rhaid i gŵn bob amser gael mynediad i ardal sych, glân a dylent allu osgoi lloriau gwlyb ar ôl eu glanhau. Dylai'r gwresogi a'r llif aer fod yn ddigonol i roi modd i loriau sychu'n gyflym.

17 Dylid symud cŵn o'u cenedl er mwyn glanhau'r lle yn drylwyr a hynny'n cynnwys chwistrellu dŵr drosto.

d. Cwmnïaeth

Cadw cŵn mewn grŵp neu ar wahân

1 Pryd bynnag y bo modd, dylid cadw cŵn mewn parau neu grwpiau bychain.

2 Pan gedwir cŵn gyda'i gilydd rhaid iddynt gyd-dynnu. Bydd rhai mân arwyddion dros dro o ofn ac/neu ymddygiad ymosodol yn digwydd wrth eu rhoi gyda'i gilydd ar y dechrau. Rhaid peidio â chartrefu cŵn gyda'i gilydd os ydynt yn dangos arwyddion difrifol neu barhaus o ymddygiad ymosodol

tuag at gŵn eraill (e.e. brathu, erlid, eu gwthio a'u dal i lawr, neu eu rhwystro rhag symud), neu rai sy'n osgoi ac/neu yn ofni cŵn eraill.

- 3 *Dylai penderfyniadau ynghylch pa gŵn y gellid eu cartrefu fel pâr neu grŵp gael eu gwneud gan staff cymwys addas.*
- 4 *Dylid cyflwyno parau newydd yn raddol o dan oruchwyliaeth staff cymwys mewn amgylchedd niwtral lle gallant osgoi ei gilydd os ydynt yn dewis.*
- 5 **Rhaid i gŵn a gedwir mewn pâr ac mewn grŵp gael digon o le ac adnoddau digonol i leihau cystadleuaeth a monopoli ac i allu symud oddi wrth ei gilydd os byddent yn dewis hynny.**
- 6 **Yn ystod cyfnodau heb oruchwyliaeth, rhaid i'r milgwn fod yn ddiogel rhag ymosodiad, straen neu anaf gan filgwn eraill, anifeiliaid neu bobl.**
- 7 *Fel egwyddor gyffredinol, ni ddylid rhoi cŵn mewn safnffrwyd mewn cenel er mwyn hwyluso cadw ci mewn pâr neu grŵp. Efallai y bydd amgylchiadau penodol lle mae angen iddynt fod mewn safnffrwyd pan fyddant heb oruchwyliaeth am gyfnod cyfyngedig e.e. dros nos. Ni ddylai hyn fod yn fwy na thridiau. Ni ddylid defnyddio safnffrwyd o dan unrhyw amgylchiadau fel strategaeth hirdymor i gadw cŵn gyda'i gilydd.*
- 8 **Rhaid i gŵn na ellir eu cartrefu â chŵn eraill oherwydd pryderon ymddygiad ac sy'n cael eu cadw ar eu pennau eu hunain fod â dulliau cyfoethogi amgen gan gynnwys (os yw'n briodol) cyswllt dynol priodol ychwanegol uwchlaw'r hyn a nodwyd yn y paragraff ar gwmni dynol.**
- 9 **Ar gyfer cŵn sy'n gwerthfawrogi cwmni ei gilydd, ond pan fo'r llety'n anaddas ar gyfer eu cadw mewn pâr neu grŵp, rhaid darparu cyfleoedd rheolaidd i ymwneud ac ymarfer â chŵn eraill.**

10 *Ni ddylid cadw milieist sydd yn cwana neu'n agos at y cyfnod hwnnw, mewn cyswllt arogleuol â milgwn gwrywaidd sy'n naw mis neu hŷn.*

Defnyddio safnffrwyd (muzzle)

- 11 *Dylid nodi protocolau defnyddio safnffrwyd yn y Cynllun Lles a Rheoli.*
- 12 *Dylai unrhyw safnffrwyd a ddefnyddir fod yn ffitio'n ddiogel a chyfforddus ac yn gadael i gŵn yfed, chwydu ac anadlu â'i dafod allan.*
- 13 **Mae safnffrwyd basged yn dderbyniol, ond rhaid peidio â defnyddio mathau eraill gan eu bod yn atal yfed ac anadlu â'u tafod allan sy'n hanfodol ar gyfer hydradiad a rheoleiddio tymheredd.**
- 14 *Dylid cyflwyno safnffrwyd mewn ffordd raddol a chadarnhaol ac yn ddelfrydol fel rhan o gynefino yn ystod y magu (gweler Rhan 5).*
- 15 *Ni ddylid gosod safnffrwyd ar filgwn am fwy na 30 munud ar y tro heblaw:*
 - i) *o dan gyfarwyddyd llym, ysgrifenedig, milfeddyg;*
 - ii) *fel rhan o raglen ymgyfarwyddo â llety fel y manylir yng Nghynllun Lles a Rheoli'r sefydliad.*
- 16 *Dylid adolygu unrhyw gyfarwyddyd gan filfeddyg ynghylch defnyddio safnffrwyd ar gi penodol o leiaf unwaith y flwyddyn.*

Cwmni pobl

- 17 **Rhaid i gŵn gael digon o gyfleoedd i gael cysylltiad â phobl a hynny yn ddyddiol ar y lleiaf. Gall hyn gynnwys brwsio a gofalu, ymarfer corff, chwarae, mwytho a hyfforddi ond ar lefel sy'n addas i'r ci unigol.**
- 18 **Rhaid i'r holl staff ymdrechu i gael perthynas gadarnhaol â phob ci ac osgoi ymwneud yn negyddol â nhw.**

- 19 Rhaid trin cŵn mewn ffordd garedig, yn dyner a chadarnhaol. *Ni ddylid gweiddi arnynt, eu gwthio na'u taro.*
- 20 Rhaid i staff fedru adnabod arwyddion cŵn sy'n ofnus ac yn bryderus yn ogystal â'r rhai sy'n hamddenol ac yn ddigynnwrf.

Hyfforddiant/cymhwysedd staff

- 21 Rhaid bod digon o bersonél ar gael bob dydd i sicrhau y darperir ar gyfer anghenion lles beunyddiol y milgwn.
- 22 *Dylai'r holl staff sy'n gyfrifol am ofalu am filgwn gwblhau hyfforddiant ac addysg briodol i fod yn gymwys wrth drin milgwn ac i feithrin y sgiliau ac/neu'r profiad sy'n angenrheidiol i gydymffurfio â'r Cod hwn.*
- 23 *Hyd nes y bydd yr hyfforddiant gofynnol wedi'i gwblhau, dylai staff y sefydliad weithio dan oruchwyliaeth uniongyrchol unigolyn (unigolion) sydd â phrofiad ac/neu gymwysterau addas.*

e. Gofal iechyd

- 1 Rhaid i'r holl staff allu adnabod arwyddion a bod yn gyfarwydd â salwch, anaf ac afiechyd.
- 2 Rhaid cael cyngor milfeddyg yn syth os yw ci yn dangos arwyddion o afiechyd, gan gynnwys (ond heb ei gyfyngu i'r rhain) syrthni, newid ymddygiad, arwyddion poen, tisian neu beswch drosodd a throsodd, methu anadlu, carthion rhydd (sy'n parhau am hir), rhwymedd neu anhawster pasio dŵr/wrin, chwydu neu ddolur rhydd, cloffni neu anallu i sefyll neu gerdded, rhannau'r corff yn gwaedu neu'n chwyddo, magu neu golli pwysau sylweddol mewn cyfnod byr, diffyg archwaeth bwyd, yfed yn fwy neu'n llai na'r arfer, chwyddo anarferol, edrych fel petai mewn poen, ffitiau neu'n cael trafferth sefyll, clwyfau, rhediad o'r clustiau neu'r llygaid, cosi neu lid, colli blew yn sylweddol neu'n anarferol, neu grafu ac ysgwyd y pen

drosodd a throsodd.

- 3 Rhaid i filgwn sydd wedi'u diagnosio â chlefyd deintyddol clinigol gael triniaeth ddeintyddol yn unol â chyfarwyddyd milfeddyg.
- 4 *Dylid cofnodi unrhyw broblemau iechyd a darparu tystiolaeth i'r swyddog arolygu bod cynllun triniaeth wedi'i lunio ar y cyd â milfeddyg a'i weithredu.*

Monitro iechyd

- 5 Rhaid i bob ci, ar y lleiaf, gael archwiliad gweledol bob dydd i chwilio am arwyddion salwch (gweler adran e. Gofal iechyd uchod) a dylid cael archwiliad corfforol.
- 6 Os canfyddir unrhyw arwyddion o broblemau iechyd sylweddol neu ymddygiad anarferol, rhaid cael cyngor gan filfeddyg yn syth. *Dylid cofnodi hyn yng nghofnod iechyd y ci.*
- 7 *Dylid gwirio bob dydd bod cŵn yn bwyta ac yn yfed, yn gallu ymgarthu a gwneud dŵr yn normal, yn gallu symud o gwmpas yn rhydd a heb boen, a bod eu croen, eu dannedd a'u côt mewn cyflwr normal.*
- 8 *Dylid cynnal archwiliadau iechyd bob wythnos a hynny'n cynnwys eu pwysu, asesu cyflwr y corff, archwilio cyflwr y dannedd a'r gôt.*
- 9 *Dylid cadw pob cofnod iechyd unigol am o leiaf blwyddyn.*
- 10 *Dylid monitro cysondeb ysgarthol yn ddyddiol ac os canfyddir ysgarthion rhydd, dylid newid y diet yn raddol, a dylid tynnu llidwyr posibl bob yn un i geisio lliniaru hyn, ac os bydd hynny'n aflwyddiannus, dylid holi milfeddyg.*

Gofal iechyd ataliol

- 11 Rhaid cytuno ar gynllun gofal iechyd ataliol a dylid ei ysgrifennu mewn ymgynghoriad â milfeddyg a dylai fod yn rhan o'r Cynllun Lles a Rheoli. *Dylai gynnwys brechu, rheoli parasitiaid mewnlol ac allanol, monitro pwysau a sgoriau*

cyflwr y corff. Dylid cofnodi hyn yng Nghynllun Lles a Rheoli'r sefydliad.

- 12 Rhaid i bob sefydliad fod wedi'i gofrestru gyda milfeddygfa.
- 13 Dylai pob milgi gael archwiliad iechyd cyffredinol bob blwyddyn (gan gynnwys archwiliad deintyddol) gan filfeddyg (neu'n amlach yn ôl yr angen).
- 14 Rhaid cael rhaglen frechu gynhwysfawr, gan gynnwys brechu yn erbyn clefyd y cŵn (*canine distemper*), adenofirws, leptosbriosis a pharfofirws, ac yn ddefnyddol peswch cenel, a rhaid rhoi'r brechiadau yn unol â chynghor milfeddyg a chyfarwyddiadau'r gwneuthurwr.
- 15 Argymhellir bod milgwn yn cael brechiad blynyddol ar gyfer Peswch Cŵn (yn ddefnyddol paraffliw [Math II] ar y cyd â Bordetella bronchiseptica fel brechlyn yn y trwyn) a gellid rhoi hwn ar adeg eu harchwiliad iechyd blynyddol.
- 16 Rhaid cadw cofnodion brechu ar gyfer pob ci a chi bach a rhaid eu diweddarau'n rheolaidd. Dylai'r Person â Chyfrifoldeb sicrhau bod tystysgrifau brechu, gan gynnwys dyddiadau'r driniaeth nesaf, manylion y driniaeth sy'n ofynnol a chofnod o bwy a roddodd y driniaeth, yn cael eu llofnodi gan filfeddyg ar adeg pob brechiad, a'u cadw am o leiaf bum mlynedd.
- 17 Rhaid cael rhaglen i reoli parasitiaid mewdol ac allanol yn rheolaidd, fel yr argymhellir gan filfeddyg, ac yn unol â chyfarwyddiadau'r gwneuthurwr.
- 18 Os canfyddir hwy, rhaid trin cŵn yn syth am unrhyw barasitiaid mewdol ac allanol (e.e. llyngyr, chwain a throgod) a chofnodi hyn yn eu cofnod iechyd unigol.
- 19 Rhaid cofnodi'r gofal iechyd ataliol ac iachael a roddir i gŵn unigol yn eu cofnod iechyd unigol.

- 20 Rhaid twtio pob milgwn yn rheolaidd trwy eu brwsio neu ymolchi, pa un bynnag sy'n angenrheidiol. Dylai hyn fod o leiaf bob wythnos ac yn amlach os oes angen i sicrhau bod y cotiau'n cael eu cadw mewn cyflwr da a glân.
- 21 Dylai ewinedd traed milgwn gael eu harchwilio o leiaf unwaith y mis a'u torri yn ôl yr angen i atal gordyfiant.
- 22 Rhaid i ofal am ddannedd milgwn fod yn rhan o'u hamserlen reoli. Dylai dannedd pob ci gael eu brwsio â brws a phast dannedd sy'n benodol i gŵn, o leiaf bob wythnos ac yn ddefnyddol bob dydd.

Triniaeth

- 23 Rhaid rhagnodi meddyginiaethau presgripsiwn ar gyfer ci unigol a'u defnyddio yn unol â chynghor milfeddyg; dylid cofnodi eu defnyddio yng nghofnod unigol y ci.
- 24 Rhaid defnyddio meddyginiaethau heb bresgripsiwn yn unol â'r Cynllun Lles a Rheoli ac fel y cytunwyd â milfeddyg.
- 25 Dylid storio meddyginiaethau yn ddiogel ar y tymheredd cywir a hynny mewn man diogel i sicrhau na cheir mynediad heb awdurdod.
- 26 Dylid cwblhau pob cwrs yn unol â chyfarwyddyd milfeddyg.
- 27 Mae'r person sy'n gofalu am filgi yn gyfreithiol gyfrifol am fynd i chwilio am driniaeth filfeddygol yn syth ar gyfer unrhyw gi sy'n sâl neu wedi'i anafu.
- 28 Os cedwir milgwn mewn sefydliad i ffwrdd oddi wrth eu perchnogion, dylai'r perchennog/perchnogion awdurdodi rhoi triniaeth filfeddygol frys angenrheidiol yn eu habsenoldeb ac argymhellir eu bod yn llofnodi cytundeb ar gyfer pob milgi.

Glanweithdra

- 29 Rhaid cadw pob man y mae gan gŵn fynediad iddo yn lân a heb faw a llwch

wedi cronni er mwyn lleihau trosglwyddo afiechyd ac i sicrhau bod cŵn yn gyfforddus.

- 30 Rhaid i'r trefniadau glanhau fod yn ddigonol at ddibenion rheoli clefydau a diogelu lles y cŵn. *Dylid arddangos amserlenni a'r dyletswyddau glanhau a diheintio dyddiol, wythnosol, a misol.*
- 31 Rhaid i'r glanhau gynnwys fformiwleiddiad cydnabyddedig sy'n ddiogel, yn addas ac yn effeithiol yn erbyn pathogenau sy'n gyfrifol am glefydau cŵn. Rhaid i ddiheintyddion fedru lladd firws yn ogystal â bacteria a dylent gael eu cymeradwyo gan y Llywodraeth¹⁸.
- 32 *Dylid defnyddio cynnyrch glanhau a diheintio yn unol â chyfarwyddyd y gwneuthurwr a dylai'r bobl sy'n defnyddio'r cynnyrch wybod sut i'w defnyddio'n ddiogel.*
- 33 *Dylid cadw cynnyrch glanhau allan o gyrraedd anifeiliaid.*
- 34 *Dylid cynnwys y rhaglen lanhau yn y Cynllun Lles a Rheoli a ddatblygwyd gyda chynghor milfeddygol.*
- 35 *Pan gaiff cŵn eu cadw mewn cenel neu ffald/lloc, dylid archwilio pob un bob dydd ar y lleiaf a'i gadw mewn cyflwr glân.*
- 36 *Dylid carthu y man y mae milgwn sy'n oedolion yn byw ynddo o leiaf ddwywaith y dydd – yn achos cŵn bach, dylid carthu'n amlach ac o leiaf bedair gwaith y dydd.*
- 37 *Dylid diheintio o leiaf unwaith yr wythnos a phan fydd ci yn gadael y cenel yn barhaol.*
- 38 *Dylid diheintio ardaloedd byw drwy ddefnyddio diheintyddion wedi'u cymeradwyo gan Defra, a hynny:*
- i) ar ôl achos o glefyd heintus;
 - ii) cyn cyflwyno milgi newydd;
 - iii) cyn esgor ar gŵn bach; ac
 - iv) ar ôl symud y cŵn bach.

Cyfleusterau i gadw cŵn ar wahân

- 39 Rhaid cael cyfleusterau hunangynhwysol er mwyn cadw a gofalu am gŵn sy'n sâl, wedi'u hanafu neu a allai fod yn heintus (wedi'u gwahanu gan rwystr anhydraidd ac/ neu o leiaf 10m).
- 40 Rhaid mynd i edrych ar y cŵn yn y cyfleuster gwahanu yn rheolaidd ac oni bai bod staff eraill ar gael dylid ymweld â nhw ar ôl bod gyda phob ci arall.
- 41 *Dylai'r sefydliad ddarparu ar gyfer cadw anifeiliaid sâl / anafedig / heintus ar wahân, yn ogystal â'r rhai y tybir eu bod wedi dal clefydau heintus difrifol. Dylid manylu am y darpariaethau hyn yn fanwl yn y Cynllun Lles a Rheoli.*
- 42 *Pan fo'r cyfleuster i gadw cŵn ar wahân wedi'i ddarparu gan filfeddygfa'r sefydliad, dylid darparu llythyr yn nodi eu bod yn cytuno i ddarparu cyfleusterau o'r fath.*
- 43 *Ni ddylid caniatáu cŵn sy'n dangos arwyddion o glefyd heintus fynd i fannau yn yr awyr agored sy'n cael eu rhannu â chŵn ac anifeiliaid eraill.*
- 44 *Wrth drin cŵn mewn cyfleusterau o'r fath, dylid gwisgo dillad ac esgidiau amddiffynnol a dilyn protocolau glanweithdra.*
- 45 *Dylid storio cynwysyddion bwyd a dŵr, offer gwely a glanhau'r cyfleuster hwnnw ar wahân i rai gweddill y sefydliad.*

Bioddiogelwch

- 46 *Dylai sefydliadau gael cynllun bioddiogelwch.*

Ar y lleiaf dylai'r cynllun hwn gynnwys:

- Cadw ar wahân;
 - i) Defnyddio cyfleusterau arwahanu/cadw ar wahân
 - ii) Diheintio bob dydd
 - iii) Defnyddio offer glanhau gwahanol
 - iv) Cael gwared â deunydd gwely a charthion

- v) Defnyddio powlenni bwyd a dŵr gwahanol
- vi) Defnyddio baddonau traed
- vii) Cyfoethogi'r amgylchedd
- Padogau/llociau;
 - i) Defnyddio padogau gwahanol
 - ii) Cyswllt cyfyngedig â milgwn ac anifeiliaid eraill
 - iii) Mynediad cyfyngedig i badogau/caeau eraill
 - iv) Mynediad cyfyngedig i'r cyhoedd a staff nad ydynt yn gweithio yn y cenel
 - v) Glanhau, diheintio a charthu
- Cludiant;
- Staffio;
 - i) Neilltuo staff penodol
 - ii) Defnyddio offer amddiffynnol personol gan gynnwys gorchuddion traed a menig a throswisg
 - iii) Trin anifeiliaid
 - iv) Hylendid staff
 - v) Pa mor aml y dylid arsylwi
- Cael gwared ar garcas/cyrff marw.

Cadw cofnodion

47 Dylai'r sefydliad gadw cofrestr o'r holl gŵn ynghyd â gwybodaeth unigol am bob un

ohonynt. Dylai gynnwys y wybodaeth ganlynol er nad ystyrir bod y rhestr hon yn gynhwysfawr:

- i) y dyddiad y mae pob ci wedi cyrraedd;
- ii) enw pob ci, ei oedran, rhyw, statws ysbaddu, rhif microsglodyn a disgrifiad ohono;
- iii) manylion hanes meddygol ac ymddygiadol perthnasol pob ci, gan gynnwys manylion unrhyw driniaeth a roddwyd yn erbyn parasitiaid a chyfyngiadau ar ymarfer corff;
- iv) manylion am ddietydd y ci ac anghenion cysylltiedig;
- v) ffurflenni caniatâd;
- vi) cofnod o ddyddiad/dyddiadau brechiadau diweddaraf pob ci, ynghyd â'u triniaeth llyngyr a chwain diweddaraf;
- vii) manylion unrhyw driniaeth feddygol y mae pob ci yn ei chael.

Adnabod cŵn (gweler hefyd Rhan 3)

48 Rhaid i bob ci gael microsglodyn arno a dylid cael modd rhwydd o'i adnabod, er enghraifft defnyddio coler a llabed enw.

49 Dylid cael system i sicrhau adnabod cywir ar y cŵn sy'n cael eu cadw yn y sefydliad.

50 Dylid cael rhif clir a pharhaol ar lociau unigol yn y cenel a dylid rhoi'r manylion gwybodaeth berthnasol arno.



Llun: Nerys Royal

RHAN 10: CYFARFODYDD RASIO A THREIALU

Mae'r amodau canlynol yn seiliedig ar 'Rheoliadau Lles Milgwn sy'n Rasio (Lloegr) 2010¹⁹ y bwriedir iddynt ddiogelu lles milgwn yn y trac rasio. Maent yn cynnwys darpariaethau ar gyfer presenoldeb a chyfleusterau milfeddygol, cenel, adnabod a chofnodi milgwn sy'n rasio ac anafiadau.

a. Presenoldeb milfeddyg yn y trac

- 1 *Dylai milfeddyg sydd wedi'i hyfforddi'n briodol fod yn bresennol ar y trac, ac mewn treialon gwerthu cyn dechrau rasio (ac mewn da bryd i gyflawni'r dyletswyddau a nodir yn y cod hwn), gan aros yno trwy gydol y rasio a hyd at 15 munud ar ôl i'r ras ddiwethaf orffen.*
- 2 *Dylai'r milfeddyg a swyddogion y trac gwrdd cyn y ras gyntaf ac ni ddylid rasio oni bai fod pawb yn cytuno bod y trac mewn amodau addas a heb beryglon.*
- 3 *Os bydd unrhyw ddamwain anarferol neu amodau hinsoddol niweidiol yn ystod cyfarfod, dylai'r milfeddyg a'r swyddogion gydlynw â'i gilydd a sicrhau bod pawb yn cytuno cyn y gall y rasio barhau. Argymhellir bod gan y naill neu'r llall yr hawl i fynnu bod rasio yn stopio ar sail y tywydd ac/neu les.*
- 4 *Dylai'r milfeddyg gynnal archwiliad corfforol ar bob ci cyn iddynt rasio, gan wneud yn siŵr fod cyflwr y corff yn briodol, nad yw'r ci yn gloff, gan archwilio ei ddannedd a gwirio nad yw milieist yn cwna.*
- 5 *Dylai'r milfeddyg edrych ar bob ras.*
- 6 *Dylai'r milfeddyg edrych ar bob ci sy'n gadael y trac ar ôl rasio.*
- 7 *Dylai'r milfeddyg gynnal archwiliad corfforol ar ôl y ras ar unrhyw gi sydd wedi bod yn rhan o wrthdrawiad, neu ddigwyddiad arall neu yr amheuir ei fod yn gloff wrth adael y trac.*

b. Cyfleusterau ar gyfer y milfeddyg

- 1 *Dylai'r milfeddyg sy'n bresennol fedru defnyddio ystafell neu gyfleuster symudol:*
 - i) *sydd yn lân ac sydd â waliau a lloriau sydd ag arwyneb anhydraidd sy'n rhwydd ei lanhau;*
 - ii) *y mae modd ei gloi;*
 - iii) *sydd â golau da;*
 - iv) *sydd â gwres ac awyru;*
 - v) *sydd â dŵr tap oer a phoeth;*
 - vi) *sydd â bwrdd archwilio sy'n addas ar gyfer archwilio milgwn;*
 - vii) *sydd â chwprdd sy'n cloi sy'n addas ar gyfer storio meddyginiaeth i anifeiliaid;*
 - viii) *sydd ag oergell sy'n addas ar gyfer storio meddyginiaeth i anifeiliaid;*
 - ix) *wedi'i leoli yn ddigon agos at yr ardal lle cynhelir y ras neu dreial neu dreial gwerthu i fedru cael mynediad cyflym iddo petai argyfwng;*
 - x) *sydd â rhewgell yn addas ar gyfer storio carcass milgwn;*
 - xi) *yn cynnwys crât neu genel, i'w ddefnyddio mewn achosion milfeddygol brys*
- 2 *Argymhellir yn gryf y dylai'r milfeddyg gael digon o gyflenwadau i gynnal triniaeth frys ac ewthanasia ar nifer o gŵn yn y cyfarfod rasio pe bai angen hynny.*

c. Rheoli cŵn ar y trac

- 1 Rhaid i berchnogion beidio â rasio cŵn nad ydynt yn ffit neu'n iach i rasio.**
- Ni ddylai rasio ddigwydd os yw'r tymheredd yn 28°C ac uwch oni bai:*
 - bod y milgwn sy'n mynychu'r trac yn cael eu cludo yno mewn cerbydau sydd ag aerdymheru; ac,*
 - maent wedi'u cadw mewn rhan o'r trac lle gellir cadw tymereddau rhwng 10°C a 26°C; ac,*
 - mae gan y trac fecanweithiau oeri cyflym i oeri milgwn ar ôl ras megis ystafelloedd ag aerdymheru oeri.*
- Ni ddylai milgwn o dan 15 mis oed redeg mewn unrhyw ras neu dreial. Oedran milgi yw diwrnod cyntaf y mis y cawsant eu geni.*
- Ni ddylid treialu na rasio milieist sydd yn cwna neu'n agos at y cyfnod hwnnw, oherwydd gall hyn achosi rhwystredigaeth i'r milgwn gwrywaidd cyfagos.*
- Dylid cynhesu pob ci cyn y ras, a'i oeri ar ôl rasio.*
- Dylid glanhau traed pob ci (a'i safnffrwyng os oes angen hwnnw) i gael gwared â thywod ar ôl rasio.*
- Os nad yw milgi wedi rasio ers chwe mis, neu os oedd wedi bod mewn digwyddiad yn eu ras ddiwethaf, dylent wneud treial a chael eu cadarnhau i fod yn ffit gan y milfeddyg a swyddogion y trac cyn rasio yn gystadleuol.*
- Os nad yw milgi wedi rasio ers chwe mis neu fwy am unrhyw reswm, dylai milfeddyg edrych arno cyn iddo gymryd rhan mewn treial neu ras.*
- Argymhellir rhoi cŵn yn y trapiau y bernir eu bod yn gyfforddus yn rhedeg ynddynt ac na chânt eu symud fwy nag un safle trap ers eu ras ddiwethaf.*

d. Adnabod milgi

- Dim ond milgwn sydd wedi'u hadnabod drwy ficrosglodyn ac sydd wedi'u cofrestru ar gronfa ddata'r trac y dylid caniatáu iddynt rasio.*
- Dylai swyddog y trac ac/neu filfeddyg wirio pob milgi sy'n mynd i dreial neu ras i sicrhau eu bod yn gallu hadnabod y milgi drwy ficrosglodyn.*

e. Cadw cofnodion

- Dylai unrhyw anafiadau neu gloffni a gafwyd ar y trac, ac unrhyw driniaethau a roddwyd, gael eu cofnodi ar gronfa ddata'r trac a dylid cadw'r cofnodion yn unol â deddfwriaeth GDPR.*
- Dylai'r cofnod gynnwys: dull hadnabod y milgwn, natur yr anaf a gafwyd, manylion unrhyw driniaeth a roddwyd, pellter y ras neu'r treial gwerthu y digwyddodd yr anaf ynddo a dyddiad yr anaf. Rhaid i weithredwr y trac gadw'r wybodaeth hon yn unol â Deddfwriaeth Diogelu Data.*
- Argymhellir dadansoddi'r cofnodion bob mis o leiaf a bod tueddiadau mewn anafiadau yn cael eu nodi a'u defnyddio i lywio penderfyniadau ynghylch rheoli trac er mwyn lleihau digwyddiadau yn y dyfodol.*

f. Cenedl y trac

- Pan ddarperir cenedl/cwt, rhaid iddynt fod:**
 - **yn ddigon mawr i adael i gŵn symud a gorwedd i lawr ynddynt heb gyffwrdd â'r ochrau na'r to, ac i allu osgoi unrhyw wrin a baw;**
 - **yn ddiogel** fel na ellir rhoi unrhyw sylweddau i'r cŵn;
 - **â golau naturiol ac wedi'u hawyru'n dda.**
- Rhaid i ddŵr fod ar gael drwy'r amser i bob ci.**

- 3 Os yw'r cŵn yn mynd i aros yn eu cerbydau cludo cyn neu ar ôl y ras, rhaid i'r ardal lle mae'r ci ynddo fod yn ddigon mawr i adael i'r ci droi o gwmpas a gorwedd gan ymestyn yn llawn.
- 4 Rhaid i'r tymheredd yn y man ble mae'r cŵn yn aros fod yn gyson rhwng 10 a 26°C.

g. Trin salwch ac anafiadau a gafwyd wrth rasio

- 1 Pan fydd milgi yn mynd yn sâl neu'n cael ei anafu mewn digwyddiad rasio, rhaid cael cyngor milfeddyg ar unwaith.
- 2 Os yw milfeddyg neu swyddog rasio arall wedi pennu cyfnod 'anallu' (incapacitation) yn flaenorol (yn dilyn anaf), dim ond ar ôl i'r cyfnod hwnnw fynd heibio y dylai ci rasio, neu pan fydd

milfeddyg wedi datgan ei fod yn ffit ac wedi cwblhau treial.

- 3 Dylid cofnodi'r anaf (gweler adran 10e).

h. Rheoli trac

- 1 Rhaid i'r holl ddeunyddiau sy'n rhan annatod o'r trac rasio gan gynnwys rhwystrau, trapiau, arwynebau a'r ysgyfarnog gael eu dylunio a'u cynnal yn y fath fodd i atal anaf ac/neu niwed i filgwn rasio.
- 2 Os yw dadansoddi cofnodion yn awgrymu y gallai tueddiadau mewn anafiadau fod yn gysylltiedig ag agweddau ar reoli trac, argymhellir y dylid diwygio protocolau rheoli mewn ymdrech i leihau digwyddiadau o'r fath yn y dyfodol, a dylid monitro'r effeithiau'n fanwl.



RHAN 11: GADAEI Y DIWYDIANT

1 Pan fydd milgi yn gadael y diwydiant drwy unrhyw lwybr, dylid cofnodi yng nghronfa ddata'r trac y rheswm dros hynny, y llwybr ymadael ac enw'r ganolfan ailgartrefu neu berchennog preifat neu achos y farwolaeth, os yw'n briodol.

a. Ymddeol

1 Mae'n gyfrifoldeb ar y cyd rhwng y bridiwr, y perchennog a'r hyfforddwr i sicrhau, pan fydd milgi yn gadael y diwydiant, bod gan bob ci y cyfle gorau i gael ei ailgartrefu a'i fod yn gallu mwynhau bywyd hapus ac iach. Mae hyn yn cynnwys gwneud pob ymdrech resymol i baratoi'r milgi at gael ei ailgartrefu yn ogystal â rhoi hyfforddiant cymdeithasoli ac ymddygiad priodol iddo gyda hyfforddwr ardstyiedig sydd â chymwysterau addas.

2 Argymhellir yn gryf y dylid ailgartrefu drwy ddefnyddio mudiad ag enw da, sy'n aelod o Gymdeithas Cartrefi Cŵn a Chathod²⁰ a bod cynlluniau a pharatoi at ymddeoliad y ci yn digwydd mor gynnar â phosibl.

3 Os caiff milgi ei ailgartrefu cyn cwblhau rhaglen baratoi, dylai'r perchennog cofrestredig roi gwybodaeth i berchennog newydd y milgi neu ei ofalwr dros dro am iechyd ac ymddygiad y milgi ar adeg ei fabwysiadu ynghyd â manylion yr ymdrechion a wnaed i baratoi'r ci ar gyfer ailgartrefu.

b. Adsefydlu / Addasu Ymddygiad

1 Yn ystod eu gyrfa rasio, dylid cyflwyno cŵn yn raddol i leoedd newydd, er mwyn hwyluso'r cyfnod pontio diweddarach ar ôl ymddeol.

2 Cyn ailgartrefu, dylid dysgu milgwn i dreulio amser yn dawel ar eu pennau eu hunain, oherwydd gall hyn atal datblygu problemau sy'n gysylltiedig â gwahanu, dylent gael eu cyflwyni'n raddol i gyfnodau sy'n gynyddol hirach o fod ar eu pennau eu hunain a gall hyn fod yn rhan o hyfforddiant crât rasio neu weithgareddau hyfforddi eraill.

3 Dylai unrhyw amser y mae cŵn yn ei dreulio ar ei ben ei hun fod yn brofiad positif, er enghraifft, trwy ddarparu eitem bwyd neu degan hirhoedlog a ffefrir ganddynt. Os yw'r milgi dan straen ac nad yw'n setlo yna dylai'r gofalwr ddod â'r sesiwn i ben ac yn y sesiwn nesaf dylid gadael y milgi ar ei ben ei hun am gyfnod byrrach, fel nad ydynt yn mynd yn ofidus.

4 Cyn cael eu hailgartrefu gydag aelod o'r cyhoedd, dylid cyflwyno pob milgi i broses raddio a gynlluniwyd ymlaen llaw gan gynnwys eu cyflwyno i olygfeydd, synau a phrofiadau y maent yn debygol o ddod ar eu traws mewn cartref a dylai'r ci ddangos ei fod yn ddigyffro yn eu presenoldeb.

5 Dylai hyn gynnwys:

- i) cerdded ar dennyn;
- ii) strydoedd distaw a rhai prysur;
- iii) amrywiaeth o bobl gan gynnwys plant;
- iv) peiriannau a dyfeisiau mewn tai.

6 Dylai'r cyflwyniad iddynt fod yn raddol, a dylid gwobrwyo ymddygiadau digynnwrf.

7 Os yw cŵn yn methu â chynefino ag ysgogiadau penodol ac yn parhau i ddangos ofn, dylid eu cyfeirio at arbenigwyr clinigol cymwys mewn ymddygiad anifeiliaid. (www.abtcouncil.org.uk)

c. Ailgartrefu

1 Dylid ceisio canfod cartref newydd i bob milgi sydd wedi ymddeol yr aseswyd bod ei iechyd a'i anian yn addas i'w ailgartrefu (gan yr hyfforddwr, y perchennog, y milfeddyg a chynrychiolydd elusen sy'n ailgartrefu i gartref addas) neu ei roi i loches neu elusen sy'n ailgartrefu neu ei gadw fel anifail anwes. Gall y Gymdeithas Cartref i Gŵn a Chathod (ADCH) roi gwybodaeth am elusennau sy'n ailgartrefu yn lleol.

2 Derbynnir y bydd angen defnyddio safnffrwyng ar adegau ar filgwn wedi ymddeol, yn

enwedig yn syth ar ôl ymddeol. O'u defnyddio'n gywir, gall y rhain fod yn offer defnyddiol i ganiatáu ymarfer corff yn ddiogel, tra bo hyfforddiant yn parhau.

- 3 Argymhellir y dylai unrhyw sefydliadau ac unigolion sy'n ailgartrefu milgwn i aelodau'r cyhoedd roi gwybodaeth frifio llawn a darparu deunyddiau addysgol ar anghenion lles y ci gan gynnwys cyngor ar reoli ymddygiad a hwyluso'r trawsnewid i amgylchedd domestig.
- 4 Dylid ysbaddu pob milgi cyn ei ailgartrefu.
- 5 Dylid rhoi datganiad iechyd, lles a rheoli gyda phob milgi rasio sydd wedi ymddeol ac sy'n cael ei werthu, ei roi i ffwrdd neu ei drosglwyddo. Dylid cynnwys manylion unrhyw annormaledd corfforol hysbys (gan gynnwys anaf) ar adeg ei werthu neu ei drosglwyddo, unrhyw driniaeth y mae'r milgi yn ei derbyn neu ei hangen, a sut y gall yr annormaledd hwnnw effeithio ar iechyd a lles tymor byr a thymor hir y milgwn, ynghyd â chynnwys eu tystysgrifau brechu.
- 6 Dylid hysbysu'r awdurdodau rasio am y newid perchnogaeth yn ogystal â chwmmi'r microsglodyn.
- 7 Pryd bynnag y bo hynny'n bosibl, argymhellir ailgartrefu parau cydnaws o'r un cenedl gyda'i gilydd.

d. Ewthanasia

- 1 Os cedwir milgwn mewn lleoliad i ffwrdd oddi wrth eu perchnogion, dylai'r perchennog/perchnogion rag-awdurdodi darparu ewthanasia brys yn eu habsenoldeb ac argymhellir eu bod yn llofnodi cytundeb ar gyfer pob milgi.
- 2 Dylid cynnal ewthanasia ar gyngor milfeddyg a chan filfeddyg, a hynny pan:
 - i) *na ellir rheoli poen, trallod neu ddioddefaint y milgi yn ddigonol;*

ii) *mae iechyd neu les y milgi wedi'i beryglu i'r fath raddau nes bod y tebygolrwydd o gael bywyd pleserus yn isel; neu*

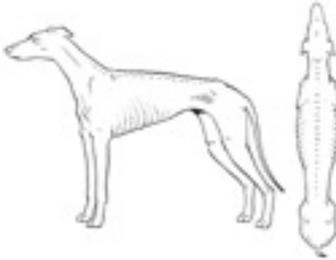
iii) *sylweddolir bod y milgi yn anaddas i'w ailgartrefu (gan yr hyfforddwr, perchennog, milfeddyg a chynrychiolydd elusen sy'n ailgartrefu) a bod hyn wedi'i gadarnhau gan brofion anian ac ymddygiad a gynhaliwyd gan arbenigwr clinigol ymddygiad anifeiliaid.*

- 3 Dylai'r milfeddyg roi Tystysgrif Ewthanasia i'r perchennog cofrestredig ar ôl cynnal yr ewthanasia ar y milgi.
- 4 Pryd bynnag y bo hynny'n bosibl, dylid cynnal yr ewthanasia mewn ardal sydd ar wahân i unrhyw ardal lletya milgwn ac allan o olwg ac arogl milgwn eraill, ac allan o olwg y cyhoedd.
- 5 Os bydd milgi rasio yn marw drwy ffordd heblaw trwy ewthanasia, dylai'r person sy'n gyfrifol gael barn milfeddyg i bennu achos y farwolaeth, p'un ai trwy archwiliad neu bost mortem.

Datblygwyd y cod hwn gan ddefnyddio cymynrodd a adawyd i'r RSPCA i wella lles milgwn rasio. Roedd yr arian wedi golygu gallu sicrhau gwasanaethau Dr Nicola Rooney a gyd-ysgrifennodd y cod hwn gyda Dr Samantha Gaines, Pennaeth Gwyddor a Pholisi Anifeiliaid Anwes yr RSPCA ar ran Gweithgor Lles Milgwn, sef is-grŵp o Rwydwaith Lles Anifeiliaid Cymru (AWNW).

ATODIAD A: SIART SGÔR CYFLWR Y CORFF

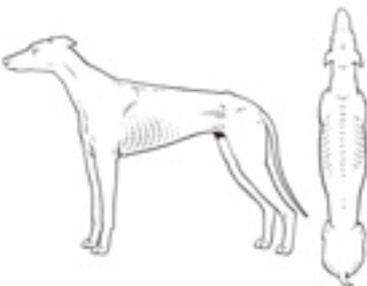
1. Esgyrnog



- i) Asennau unigol, asgwrn y cefn a'r pelfis yn amlwg ac yn weladwy o bell.
- ii) Dim màs o gyhyrau.
- iii) Ychydig neu ddim bloneg ar y corff.
- iv) Bôn y gynffon yn bantiog.
- v) Siâp y wasg/canol yn weladwy iawn o edrych lawr ar y ci.
- vi) Y bol yn amlwg ynghudd.
- vii) Y gwddf yn denau.
- viii) Dim bloneg ar y gynffon.

Rhaid cael cyngor milfeddyg.

2. Tenau



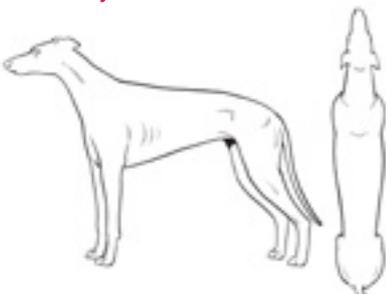
- i) Yr asennau, asgwrn y cefn ac esgyrn y pelfis yn weladwy ac yn hawdd eu teimlo.
- ii) Ychydig iawn o floneg ar y corff.
- iii) Y gwddf yn denau.
- iv) Y bol ynghudd.
- v) Ychydig iawn o floneg ar y cynffon.
- vi) Siâp y wasg/canol yn amlwg wrth edrych lawr ar y ci.

Rhowch fwy o fwyd i'r ci a rhowch driniaeth cael gwared â llyngyr os na wnaed hynny'n ddiweddar (gwnewch yn siŵr eich bod y defnyddio triniaeth gyflawn – nid yw rhai triniaethau yn cael gwared â phob llyngyr).

Gofynnwch am gyngor milfeddyg os yw'r pwysau'r ci yn dal i fod yn rhy isel neu os ydych yn ansicr ynghylch y bwydo neu'r driniaeth cael gwared â llyngyr.

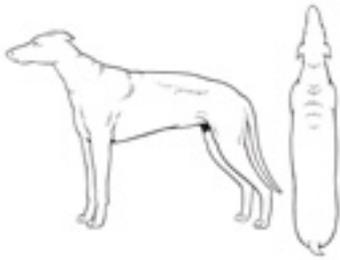
Mae gan filgwn rasio sgôr cyflwr y corff sydd hanner ffordd rhwng tenau a delfrydol.

3. Delfrydol



- i) Gellir teimlo'r asennau ac asgwrn y cefn, efallai y bydd rhai o'r asennau diwethaf yn weladwy.
- ii) Dylai'r ci fod â gwasg wrth edrych lawr arno.
- iii) Y bol ynghudd wrth edrych arno o'r ochr.
- iv) Màs da o gyhyrau.
- v) Bôn y gynffon yn gyhyrog.

4. Rhy drwm

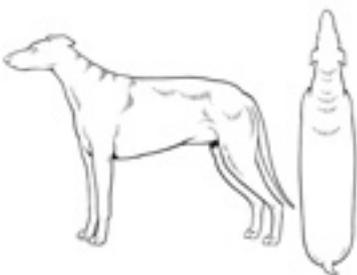


- i) Yr asennau ac asgwrn y cefn ddim yn weladwy ond gellir eu teimlo.
- ii) Bloneg ar y gynffon.
- iii) Ychydig neu ddim gwasg wrth edrych lawr ar y ci, mae ei siâp yn grwn, y cefn fel petai'n mynd yn lletach.
- iv) Y ci yn sgwâr ar hyd llinell y cefn wrth edrych arno o'r ochr.
- v) Y bol heb ei guddio, gall ymddangos yn grwn oddi tano.

Dylid rhoi llai o fwyd neu roi bwyd sydd â llai o galoriau. Dylid cynyddu ymarfer corff.

Gofynnwch am gyngor milfeddyg os ydych yn ansicr ynghylch y diet priodol neu os oes pryderon ynghylch yr ymarfer corff.

5. Gordew



- i) Yr asennau ac asgwrn y cefn ddim yn weladwy ac yn anodd eu teimlo.
- ii) Mae bloneg yn amlwg ar y gynffon.
- iii) Dim gwasg a'r cefn yn mynd yn lletach wrth edrych lawr ar y ci.
- iv) Y bol yn amlwg yn grwn ac o bosibl wedi ymestyn.
- v) Y ci yn sgwâr neu'n grwn ar hyd y llinell gefn wrth edrych arno o'r ochr.

Gofynnwch am gyngor milfeddyg i gael cyngor ar ddiet ac ymarfer corff.

Agenda Item 9.3

MINISTERIAL INTERNATIONAL ENGAGEMENT

September 2025

INWARD VISITS	
25 Sept	Visit to Wales by the Ambassador of Timor Leste to the UK The Cabinet Secretary for Social Justice, Trefnydd and Chief Whip met with the Ambassador of Timor Leste on his visit to mark the occasion of the opening of a new honorary consulate in Wales. Later in the day the Cabinet Secretary attending a private flag raising ceremony.
OUTWARD VISITS	
06 Sept	Cabinet Secretary for Finance and Welsh Language meeting with the Deputy First Minister of Scotland The Cabinet Secretary met with the Deputy First Minister of Scotland in the margins of the British Irish Association Conference. The main focus of the meeting was an exchange on language policy and promotion.