

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.