

Rt Hon Elin Jones MS
Llywydd
Senedd Cymru

14 November 2025

Dear Llywydd,

Business Committee Review of the Public Bill and Member Bill Process; Publication of Pre-introduction Bills

Thank you for your letter dated 10 October 2025.

Our Committee has direct experience of the Welsh Government's recent practice of publishing pre-introduction versions of Bills, specifically the Prohibition of Greyhound Racing (Wales) Bill.

The Bill was formally introduced on 29 September 2025. Ahead of formal introduction, the Welsh Government published a pre-introduction, draft version of the Bill on 28 August 2025.

Please find below our responses to your questions:

Whether the publication of the Bill prior to its formal introduction was useful.

The publication of the Bill prior to its formal introduction was useful, to an extent. The Committee's experience of scrutinising this Bill, however, demonstrates that such early publication is not an adequate substitute for either a shortened scrutiny timetable or a robust policy development process ahead of introduction.

Whether it enabled you to take any decisions or carry out any activities that you would otherwise have been unable to.

The early publication of a draft of the Bill enabled the Committee to share information with key stakeholders ahead of formal introduction. Advanced sight of the text and scope of the Bill allowed stakeholders to begin the preparation of their evidence in anticipation of the shortened timetable for Stage 1 scrutiny of eight weeks.

Whilst this early access was beneficial in facilitating some preparatory work, both for stakeholders and officials, this did not fully compensate for the impact of the shortened timetable (which undoubtedly had a negative effect). Several stakeholders were not able to engage with the scrutiny process as fully as they would have wished. Some respondents told us they had not had sufficient time to form a considered position on the Bill, and others were unable to attend evidence sessions or submit written evidence within the time available.

Whether there were any associated disadvantages, limitations, or risks.

A clear risk and limitation of this approach is that work on a draft Bill may still be ongoing at the time of early publication, meaning the text might be subject to change before formal introduction. This could lead to confusion or misinterpretation among stakeholders who engage with a version of a bill that is not final.

Any changes to the draft might also result in wasted time and effort for those preparing to scrutinise a Bill that is significantly altered. Preparations can only be made so far in advance, and uncertainty around the final content limits the effectiveness of early engagement.

What is more, early exposure of the draft Bill in this case (that is, the bill we have been scrutinising) attracted complaints from stakeholders about the scrutiny process before it had formally begun and could be robustly defended. This created challenges in managing expectations and maintaining confidence in the integrity of the process.

Whether future Welsh Governments should be encouraged to continue the practice of publishing Bills prior to formal introduction.

As a general principle, our Members expressed a preference for having as much information as possible, as early as possible, particularly for larger Bills that require a longer lead-in time, and more time for stakeholders to engage with the process. That is, we believe that the early publication of draft Bills would be most useful when dealing with large and complicated pieces of legislation, where early engagement can support more effective scrutiny and preparation. For smaller or less complex Bills, though, we think the benefits are more limited.

In our view, the effectiveness of legislation depends on the quality of the underlying policy work. Early publication of draft Bills cannot compensate for inadequate policy foundations. Robust and well-considered policy work remains the cornerstone of good legislation.

In summary, we believe that it is useful to see as much information as possible as early as possible. The pre-introduction process does therefore have some merit, most especially with large, complicated Bills. However, its use should not be used as a justification either for inadequate policy development or for shortened Senedd scrutiny.

I trust that the Committee's views will be useful to your consideration.

Yours sincerely,

Delyth Jewell

Delyth Jewell MS
Committee Chair

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.



Senedd Cymru
Welsh Parliament