

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros
Newid Hinsawdd a Materion Gwledig
Deputy First Minister and Cabinet Secretary for Climate
Change and Rural Affairs



Llywodraeth Cymru
Welsh Government

Mike Hedges MS
Chair, Legislation, Justice and
Constitution Committee

SeneddLJCC@senedd.wales

5 January 2026

Dear Mike,

Thank you for the Legislation, Justice and Constitution Committee's report in relation to the Prohibition of Greyhound Racing (Wales) Bill, published on 5 December 2025.

I welcome the Committee's recommendations and considerations of the Bill. I have set out the Government's response in the annex to this letter. I am pleased to have accepted or accepted in part three recommendations.

I am copying this letter to the Chair of the Finance Committee and the Chair of the Culture, Communications, Welsh Language, Sport and International Relations Committee for information.

Yours sincerely,

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd
a Materion Gwledig
Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Prohibition of Greyhound Racing (Wales) Bill

Government response to the recommendations from the Legislation, Justice and Constitution Committee

Recommendation 1: Prior to the Stage 1 debate on the general principles of the Bill, the Cabinet Secretary should publish a written statement explaining:

- **how the Bill is compatible with Article 8 of and Article 1 of Protocol 1 to the European Convention on Human Rights**
- **how he reached that view given that relevant impact assessments do not appear to have been fully completed prior to the Bill's introduction and are subject to ongoing review**
- **why he believes that the completion of the impact assessments will not affect his view that the Bill is compatible with the European Convention on Human Rights.**

Response: Reject.

Bill provisions are always subject to a thorough assessment of legislative competence, including Convention rights, before they are introduced.

The outcome of the Welsh Government's assessment of the Bill's compatibility with Convention rights, at introduction, is included in the Explanatory Memorandum which accompanies the Bill. Ministers also note that the Llywydd has determined that the provisions of the Bill would be within the legislative competence of the Senedd.

Where additional information is received during the Bill's scrutiny by the Senedd, the Welsh Government will re-assess the Bill's provisions for compatibility with Convention Rights in light of that information and, as set out in my letter dated 4 November, I have committed to updating the equality, diversity, inclusion and human rights assessment which will be reflected in the Regulatory Impact Assessment ahead of Stage 3.

Recommendation 2: If the general principles of the Bill are agreed at Stage 1, the Cabinet Secretary should lay Written Statements in good time before tabling deadlines for Stage 2 and Stage 3 proceedings, detailing any updates to impact assessments and clearly identifying any impact on the provisions in the Bill.

Response: Accept in part.

In my letter dated 4 November I committed to updating the equality, diversity, inclusion and human rights assessment which will be reflected in the Regulatory Impact Assessment ahead of Stage 3.

Otherwise, the impact assessments will be updated should new information become available. In line with Welsh Government's commitment to write to Committees responsible for scrutinising the Bill, I will write to Committee Chairs to set out changes made to the Regulatory Impact Assessment, and whether these effect the provisions in the Bill.

Recommendation 3: The Cabinet Secretary should confirm which persons are liable for offences committed under section 1 of the Bill and paragraph 12 of Schedule 2 to the Bill, and, if appropriate, update the Explanatory Memorandum accordingly.

Response: Accept

Section 1 of the Bill creates two offences. A person commits an offence if they are an operator of a stadium or similar venue in Wales and they use it, or knowingly permit it to be used, for greyhound racing. A person also commits an offence if they are involved in organising greyhound racing in Wales.

Schedule 2 of the Bill creates two offences. A person commits an offence if they fail without reasonable excuse to comply with a requirement for assistance reasonably made under paragraph 9(c) of Schedule 2 or if they intentionally obstruct another in the exercise of a function under Schedule 2.

Chapter 3 of the Explanatory Memorandum sets out the offences under the Bill. I will revisit this content and ensure it is clarified. A revised Explanatory Memorandum will be laid ahead of Stage 3.

Recommendation 4: Should it be necessary, the Cabinet Secretary should table an amendment to the Bill to replace the word “section” in paragraph 12(2) of Schedule 2 with the word “paragraph”.

Response: Accept

I accept this recommendation and will table a government amendment to replace the reference.

Recommendation 5: The Cabinet Secretary should table an amendment to the Bill to provide for a post-implementation review of the legislation.

Response: Reject

While the Bill does not introduce new systems or reporting duties that would require a statutory post-implementation review, the Welsh Government remains committed to good practice in policy evaluation.

The Explanatory Memorandum sets out how the legislation will be subject to a post-implementation review no later than five years after it has come into force. A review will monitor the effects and impacts of the ban, in particular the effectiveness of enforcement, unintended consequences, and the broader impact of the legislation. This was reinforced by the Deputy First Minister in his 4 November response to the Committee.

As this work forms part of the wider Animal Welfare Plan for Wales, which is scheduled for review in 2026, a commitment to assess the effects of the legislation can also be incorporated there. This would help ensure that future governments have a clear responsibility to review its impact.

Conclusions

Conclusion 1: We consider that the Welsh Government's approach to legislating for a ban on greyhound racing has, in several respects, fallen short of the standard of good legislative practice that we would normally expect.

On 18 February 2025 I decided to pursue a ban on greyhound racing and subsequently determined that the policy should be implemented through primary legislation. I made this decision after considering Senedd debates, public petitions, campaign activity, and evidence gathered during the Animal Welfare consultation. The purpose of the Animal Welfare consultation was to seek views on the licensing of certain activities which were not subject to regulation. The Animal Welfare consultation included two questions on the regulation of greyhound racing, by way of evidence gathering only. This included a question on a phased ban, but it was not formal consultation on the policy as there were no extant proposals to ban at the time of this consultation. Nevertheless, my assessment of the information available, and the weight of feeling in favour of a ban, was that this was the time to move forward with a ban.

The Bill, Explanatory Memorandum and Regulatory Impact Assessment were submitted to the Llywydd for Determination on 28 August in line with Standing Orders. Following the Llywydd's Determination that the provisions of the Bill would be within the legislative competence of the Senedd, it was laid at introduction alongside the Explanatory Memorandum and Regulatory Impact Assessment, in line with Standing Orders.

Conclusion 2: As a general matter of principle, we consider it good practice that a Bill should normally not be introduced into the Senedd until all relevant impact assessments are, so far as practicable, sufficiently advanced for their key findings to be included in the Explanatory Memorandum that must accompany a Bill in accordance with Standing Order 26.6. In this case, that principle does not appear to have been fully observed, which we regard as regrettable.

The Explanatory Memorandum and Regulatory Impact Assessment laid alongside the Bill at introduction included an assessment of impact and shortly after introduction a number of impact assessments were published, including biodiversity, children's rights, data protection, equality, diversity, inclusion and human rights and the Welsh language.

In my letter to the Committee dated 4 November I noted that the impact assessments published alongside the Bill are subject to ongoing review, and I committed to updating the equality, diversity, inclusion and human rights impact assessment to reflect the assessment undertaken in respect of Article 8 of the European Convention on Human Rights. I will also seek to provide further information to Members of the Senedd where requested.