

# SOCIETY OF GREYHOUND VETERINARIANS

A DIVISION OF THE BRITISH VETERINARY ASSOCIATION



## **SUBMISSION TO THE D.E.F.R.A. CONSULTATION ON THE WELFARE OF RACING GREYHOUNDS REGULATIONS 2010**

### **[A.] Introduction: The Society of Greyhound Veterinarians**

The Society of Greyhound Veterinarians [S.G.V.] was founded in 1965 by a group of veterinary surgeons lead by Mr. Victor Perry of Bristol in order to promote knowledge of the racing greyhound and to enhance the status of veterinarians working at greyhound tracks. It became affiliated to the British Veterinary Association as a Specialist Division the following year. Its mission statement remains essentially unchanged to this day: to work within the greyhound industry to promote the veterinary care and welfare of the racing greyhound before, during and after its racing career. While the membership of the Society is drawn primarily from the ranks of licensed track veterinary surgeons, membership is open to any registered veterinary surgeon with an interest in greyhounds. Current members include orthopaedic specialists and veterinary surgeons in academia as well as canine sports medicine practitioners and veterinary surgeons in general practice in addition to licensed track vets. At present the Society is represented on the U.K. Greyhound Forum and the International Greyhound Forum. Individual members sit on the Greyhound Board of Great Britain [GBGB] Track Safety Committee and are trustees of the Retired Greyhound Trust. In 2007 the S.G.V. contributed to the Associate Parliamentary Group for Animal Welfare's "*Parliamentary Enquiry into the Welfare Issues Surrounding Racing Greyhounds in England*" and to Lord Donoughue of Ashton's "*Independent Review of the Greyhound Industry in Great Britain*". The current membership of the Society stands at 94, at a time when there are approximately one hundred track vets licensed by the GBGB.

### **[B.] Executive Summary:**

- The Consultation Document considers only the welfare issues affecting greyhounds at racing stadia and makes no specific mention of the welfare requirements of greyhounds on breeders' premises, on rearing farms, in trainers' kennels or in retirement.
- The Society of Greyhound Veterinarians feels that there is a very real need for regulations covering minimum standards for the construction, management and maintenance of trainer's kennels, breeding kennels & rearing farms, besides regulations covering codes of practice for mandatory kennel inspections and for the training, accreditation and licensing of kennel inspectors.
- The approach to the licensing of greyhound racing stadia follows the "hybrid" model suggested by Lord Donoughue, with the tracks overseen by the Greyhound Board of Great Britain being subject to a United Kingdom

Accreditation Service [UKAS] accreditation scheme while the independent tracks are to be subject to local authority licensing. In Lord Donoughue's words "*the Regulations will, in effect, be the lowest common denominator which spells out the minimum legal standards of welfare which must be maintained in greyhound racing*". At time of writing it is not clear what standards UKAS will apply, if indeed the GBGB application for UKAS accreditation is successful, nor is it clear what standards the Local Authorities Co-ordinators of Regulatory Services will advise should be applied to the independent tracks not regulated by GBGB. The Society of Greyhound Veterinarians would have preferred to see more detailed proposals before offering its opinion. The Society would be reluctant to accept any substantial reduction in the standards currently imposed by the GBGB "*Rules of Racing*" or the standard agreed by the Greyhound Forum as expressed in the "*Charter and Code of Practice for the Racing Greyhound*"..

- It is not clear from reading the consultation document how uniform standards across the two codes, or at very least progress towards uniformity, are to be delivered by a bipartite "hybrid" structure for licensing greyhound racing stadia.
- Consideration is clearly being given to keeping the cost of imposing the Regulations within reasonable bounds so that the independent tracks will largely be able to comply. Inherent in this approach is a very real risk that lowest common denominator may be set too low for reasons more related to financial considerations than to greyhound welfare.
- The Society of Greyhound Veterinarians feels that, although an acceptable compromise can be potentially be reached regarding many of the issues discussed in the Consultation Document, its position differs markedly from that of DEFRA on the need for some post-graduate training and education of licensed track vets, on the minimum number of kennels available at greyhound racing stadia and on the number and location of databases required for satisfactory record keeping.

#### **[C.] Responses to Specific Questions Posed in Part IV of the Consultation Document:**

##### **Q1**

Do you agree with introducing regulations setting minimum animal welfare standards for all tracks in England, or could this be achieved through a non-regulatory solution?

##### **Answer:**

Yes.

We agree that regulations setting minimum animal welfare standards should be introduced. Non-regulatory solutions have not been successful in the past.

**Q2**

*Subject to the exemption for tracks belonging to a body that has obtained UKAS accreditation - do you agree that there should be a licensing scheme for greyhound tracks in England?*

**Answer:**

Two questions are being posed here, the first relating to the acceptability of an exemption from licensing for some greyhound tracks that meet criteria set by an independent accrediting body, and the second relating to the desirability of licensing greyhound tracks in England. We intend to answer the two questions separately.

Answering the latter question first, we agree that there should be a licensing scheme for greyhound tracks in England. The welfare of racing greyhounds depends to a degree on the enforcement of minimum standards at greyhound racing stadia. To achieve such standards, stadia must be registered, inspected and licensed by an appropriate regulatory body.

The “hybrid” model for licensing of greyhound racing stadia is being presented here as the only road forward, with no alternatives being discussed or advanced. Should the tracks that come under the governance of the GBGB be exempted from these licensing requirements if the regulator is granted UKAS accreditation? We are concerned that a robust, transparent, verifiable code of welfare standards should apply throughout the greyhound industry. As yet we have not seen the standards by which UKAS accreditation will be measured, although we understand that the process of drafting these has begun. We understand that this is a first venture by UKAS into the arena of sports governance and of animal welfare regulation. Any such new venture must be to a degree experimental and cannot be guaranteed to succeed. In such circumstances might not some consideration of alternatives be wise? What systems are being advanced for the accreditation of welfare standards at those independent tracks that do not operate under GBGB rules and are subject to the proposed local authority licensing scheme? Without some such system there can be no certainty that sufficiently rigorous standards will be applied or that uniform standards can be applied throughout the industry.

To summarise, we welcome a licensing scheme for greyhound tracks but remain to be convinced of the merits of the bipartite model proposed and wish to defer judgement until the criteria to be used by UKAS on the one hand, and those advised by the Local Authorities Co-ordinators of Regulatory Services [LACORS] on the other, are in the public domain.

**Q3**

*Do you agree that if a body applies, at a minimum, those standards required under these regulations at the tracks which it regulates and is accredited by UKAS than any tracks that are affiliated to it should be exempt from the proposed licensing scheme?*

**Answer:**

As the standards on which UKAS accreditation might be based are yet to be published, we cannot unreservedly endorse such accreditation until we have satisfied ourselves as to the adequacy of the standards and the mechanisms for enforcement. We would not therefore wish to answer this question at this time.

**Q4**

*Do you agree that the licensing conditions should only apply where greyhounds are being raced or trialled?*

**Answer:**

No,

Besides our concerns about the definition of trialling used in the Consultation Document expressed in our response to Question 5 below, the Society has one major criticism to make of the proposed Statutory Instrument. Its focus is almost entirely on the welfare of greyhounds while at the track. While DEFRA may have plans to draft further secondary legislation under the Animal Welfare Act 2006 regulating other areas of the greyhound industry, this has not been made clear in the consultation document. We fully accept that there are welfare issues surrounding the racing of greyhounds which warrant regulation by legislation but a greyhound spends but a small part of its life actually at the track. As well as licensing of tracks where racing and trialling take place, we would like to see the laying down of minimum standards for the construction, management and maintenance of trainer's kennels, breeding kennels & rearing farms. We note the comment of Lord Donoughe's review group that *"standards vary widely across the industry and we recommend that minimum standards for kennelling and other built accommodation used for the purpose of keeping or housing greyhounds should be laid down in the Regulations"*. This anomaly needs to be addressed. To this end we should like to see the delineation of codes of practice for mandatory kennel inspections as suggested by Lord Donoughue's review group who stated that *"Provision should.....be included in the Regulations, enabling independent inspections to take place on behalf of the regulatory or local authority as appropriate at any reasonable time without notice"*. Inherent in the establishment of codes of practice for kennel inspections is a requirement for regulation of the training, accreditation and licensing of kennel inspectors, without which a uniform standard for kennel inspections is not achievable.

Apart from the need to provide ventilated kennels for at least 20% of the greyhounds engaged at a particular meeting, no further mention is made of the standards of construction, management and maintenance required. The Society suggests that the provision of ventilation alone is not enough, and that a code of practice for minimum standards for track kennels should be laid down in the proposed Statutory Instrument. .

Even if our discussion were to be confined to consideration of places where greyhounds are raced or trialled, it should not be overlooked that, as well as racing and trialling greyhounds at recognised racing stadia, many trainers also use schooling tracks and trials tracks when preparing greyhounds for racing. Some schooling tracks include kennels in which

greyhounds may be housed for days or weeks while being introduced to greyhound racing. The provision of such facilities for schooling may be of considerable economic importance to some independent greyhound tracks. The preference of the SGV would be for some form of licensing for all tracks of all kinds that are used for training, trialling or racing greyhounds, although the Society concedes that in practice such facilities are of such disparate nature and so widely dispersed that to do so presents considerable practical difficulties. At a minimum the Society would suggest, however, that where a schooling track is run as a commercial operation levying fees from greyhound owners and trainers for the services it offers, it should be subject to licensing under the proposed secondary legislation in the same manner as a conventional greyhound racing track. There should be some requirement for the provision of emergency veterinary care at such tracks, although we concede that an arrangement whereby a veterinary surgeon undertakes to be "on call". and in a position to attend the track promptly if required, might suffice, rather than a necessity for a veterinary surgeon to be present on site during trials. The SGV would suggest that, where a trial track or gallop comprises an integral part of a trainer's premises, an inspection of it should be included in the mandatory annual inspection of the trainer's kennels.

**Q5**

*Are the definitions of racing and trialling appropriate?*

**Answer:**

No.

For the purposes of these regulations the definition of racing is adequate but the definition of trialling should be broadened to include sales trials, which are conducted to ascertain the ability of the dogs in question rather than to qualify them or grade them for racing. The S.G.V. has some concerns about welfare standards at Sales Trials Meetings and feels that the definition of a trial used throughout the Consultation Document should be amended so as to include sales trials as a step towards the proper regulation of such trials meetings. The Society would like to suggest that the proposed Statutory Instrument should include a code of practice laying down minimum health care standards for all greyhounds offered for sale at public auction, including imported greyhound saplings, This should include verifiable veterinary certification of vaccinations and, in the case of imported dogs, treatments for endo- and ectoparasites.. A rest period for every dog after transport to the track and before trialling is commenced should be made obligatory. Transparent verifiable arrangements made for the care of unsold greyhounds at the end of the Meeting

**Q6**

*Do you agree that there should be a veterinarian present at all race meetings and trials?*

**Answer:**

Yes, subject to the concession that at tracks used solely for schooling purposes a veterinary surgeon "on call" and available to attend promptly at short notice, may suffice.

**Q7**

*Do you agree the veterinarian does not need any specialist qualifications/training other than being a RCVS registered practising vet?*

**Answer:**

No.

As the management of greyhounds differs very substantially from that of pet dogs and as the nature of the racing greyhound and the nature of greyhound sport combine to produce a range of health and welfare problems found in few other circumstances, clearly there is a need for greyhound track vets to receive some specialist training.

Veterinary surgeons engaged in the certification of animals for export, in tuberculin testing, in meat hygiene work, in the supervision of laboratory animal welfare, in the inspection of riding establishments and in the treatment of horses injured at race meetings all require some degree of further post graduate training. It seems logical to the SGV that veterinary surgeons should also be licensed to carry out greyhound track work only on completion of suitable training, although it may be acceptable for newly-licensed track veterinary surgeons to complete their post graduate training in the early weeks after their initial licensing.

To attempt to attract more veterinary surgeons into the greyhound industry by lowering standards of training and education, or to licence inadequately-trained track veterinary surgeons as an economy measure, is to risk lowering welfare standards below an acceptable minimum.

**Q8**

*Is the list of desirable qualifications/additional training contained in the draft guidance attached to Annex D suitable? Are there any other qualifications/training that would be desirable?*

**Answer:**

The list of desirable qualifications/additional training contained in the draft guidance attached to Annex D is not in our opinion entirely suitable. Other qualifications and /training are desirable.

Attendance at three greyhound races or trials, or even three race or trial meetings, which is perhaps what is intended, is inadequate, a far longer period of perhaps at least six meetings being necessary. Greyhound track work is significantly different from general small animal practice so time spent actively experiencing track work is equally as important as the thorough grounding in general small animal practice implied by the successful completion of a PDP the majority of which is related to small animals. While it is clearly desirable that trainee or aspiring track vets should attend greyhound race meetings under the supervision of an experienced mentor, Annex D

nowhere specifies what qualifications and experience this mentor should have.

Greyhound track practice differs substantially from small animal emergency work and it is not clear that mandatory attendance at a small animal emergency management course would be of great benefit to the novice or aspiring track vet.

Applicants for licensing as track vets should have:

- Some general experience of basic canine medicine and surgery
- Some experience of greyhound track practice gained under the direct supervision of a suitably-qualified experienced track vet
- Recent attendance at CPD courses devoted to greyhound track practice, canine sports medicine, orthopaedics or similar relevant fields. The SGV has for some time organised such training events on an annual basis and in 2008 staged a training course for novice or aspiring track vets in conjunction with the then British Greyhound Racing Board.

It might be argued that, by demanding a substantial degree of post graduate training from intending track vets a shortage of licensed track vets might arise and that licensed track vets might then demand levels of remuneration beyond the pockets of some of the smaller independent tracks. This is not the intention of the Society, which simply wishes to offer a competent, standardised and accredited veterinary service to all tracks. Conceivably, a lower standard of training might be deemed acceptable for veterinary surgeons who do very little track work, only covering for colleagues absent on holiday, on study leave or on sick or maternity leave. At present the GBGB may licence a registered veterinary surgeon with no background of greyhound practice for the duration of one or two race meetings when colleagues are unable to attend at short notice through some emergency.

### **Q9**

*Do you agree the veterinarian must examine each greyhound prior to a race or trial?*

### **Answer:**

Yes.

Hands-on examination of all greyhounds on arrival, backed up by an inspection immediately pre-race, following protocols agreed by representatives of the regulatory bodies, of the greyhound racing promoters and of the veterinary profession, is essential.

### **Q10**

*Do you agree that a register of veterinarian attendance must be kept at the track to demonstrate that a veterinarian has been in attendance and that this register must be kept for at least 3 years?*

### **Answer:**

Yes.

The keeping over a period of years of some form of written record of veterinary attendance would be a transparent way of validating the requisite degree of veterinary attendance. .

**Q11**

*Do you agree that a veterinarian should have access to suitable facilities?*

**Answer:**

Yes.

**Q12**

*Are the facilities as described here and in Schedule 1 – paragraph 2 of the draft Statutory Instrument attached at Annex C suitable?*

**Answer:**

Yes.

The facilities as described constitute an acceptable minimum,

**Q13**

*Should any permanent room be for the sole use of the veterinarian – including any time when a race or trial is not being undertaken?*

**Answer:**

Yes.

Presumably underlying this question is the thought that the cost of providing facilities for veterinary use could be offset if these facilities could also be put to other use when not required by the track veterinarians. However well intentioned this might be, the SGV would question its practicality and indeed its advisability.

Biosecurity considerations mean that the number of persons visiting the vets' room should be kept as small as is practicable.

The storage in the vets' room of veterinary medicines, contaminated sharps, possibly cadavers and other items that may pose health, safety and security problems means that the number of persons using the vet's room should be kept to a minimum.

Within these constraints, there can be no great objection to the vets' room being used for other purposes at times when racing or trials are not taking place, if this is necessary for economic reasons. It has to be said, however, that the size and nature of many vets' rooms and their fixtures and fittings are not such as to make them very readily adaptable to any other purpose at short notice

**Q14**

*Do you agree that tracks should provide ventilated kennelling for at least 20% of greyhounds that race? If a different figure is required, what evidence is there to support this figure?*

**Answer:**

No.

Greyhounds arriving at the track for a race meeting or trial session may in general either be housed in suitable premises at the track, housed in the

trainer's vehicle or walked around in a suitably sheltered area that meets with the requirements of biosecurity and the integrity of the sport.

Stationary cars and vans are not satisfactory places in which to house greyhounds more than briefly, even when environmental temperatures are not extreme. The standard and quality of such vehicles varies greatly and effective heating and ventilation may only occur when the engine is running and perhaps when the vehicle is in motion. For these reasons greyhounds cannot be left unattended in vehicles. Clearly holding greyhounds in trainer's vehicles is a poor second to proper kennelling and cannot be acceptable as other than the most temporary of expedients.

While walking greyhounds back and forth may help to warm them up for racing or cool off after running, the practice cannot be adopted as more than a temporary measure for biosecurity, integrity and animal welfare reasons,

Dogs at the track waiting their turn to race, or waiting to go home after racing should be kennelled. The other options are poor substitutes and completely unacceptable.

At present those tracks which stage greyhound racing under the GBGB "Rules of Racing" generally have individual kennels for every dog down to race or trial at a particular meeting, although this is not strictly obligatory under Rule 112. However this Rule also effectively requires greyhounds to be kennelled prior to the commencement of racing and consequently dogs due to run in the last race of a thirteen-race card may be kennelled for in excess of four hours, which we consider to be undesirable. The GBGB "Rules of Racing" are under review at time of writing.

Investigations by SGV members indicate that at least some independent tracks have no kennels, good bad or indifferent, available for race dogs. Can a middle ground be found between these extremes? It is suggested in the Consultation document that the provision of kennels for 20% of the competing dogs might prove sufficient, although no evidence to support this figure of 20% has been advanced. If this were to be the case, a track staging ten-race cards without reserves would require a minimum of twelve kennels. With races typically starting at 15-minute intervals, this implies that each kennel would be emptied and filled again within 30 minutes. Bearing in mind that each kennel should be disinfected and allowed to dry after one dog has vacated it and before the next dog enters it, this allows very little time to cleanse and disinfect kennels between occupants, which cannot be acceptable on biosecurity grounds. That apart, the logistics of keeping a constant stream of dogs moving out of kennels after having raced to make room for the runners in the later races to come in would be complex for the Racing Manager and his staff. If dogs engaged in the later races on the card are allowed to arrive after the meeting has started, then the track vet must make time to carry out their pre-race inspections at a time when he is already likely to be very busy, unless the program for the night's racing has been drawn up with sufficient time allocated for a second tranche of pre-race inspections midway through the meeting. If the runners in the early races on the card are encouraged to go home early to free up kennel space for those running later in the day, where does that leave the trainer with two runners, one in the first race and the other in the last?

It is hard to escape the conclusion that the provision of a separate individual kennel of appropriate design for each dog competing at every greyhound race meeting or trial session is the gold standard. We note however, that those tracks that are regulated by the GBGB have access to assistance with funding for infrastructure projects through the voluntary levy paid by most bookmakers channelled through the British Greyhound Racing Fund [BGRF]. Many of the owners and trainers who are licensed by the GBGB regularly use the facilities provided by independent tracks and, in many cases place significant reliance on them. These last cannot apply to the BGRF for financial assistance with building projects and are thus at a very considerable disadvantage. The Society appreciates that compelling them to embark on extensive programs of kennel construction might place a very considerable financial burden upon them. Nonetheless the opinion of the S.G.V. is that kennelling rates of substantially less than 100% are unsustainable for animal welfare, and animal health considerations.

**Q15**

*Are the standards proposed here and in Schedule 1 –paragraph 3 of the draft Statutory Instrument attached at Annex C for kennels appropriate?*

**Answer:**

Yes.

They are a reasonable minimum, a starting point

**Q16**

*Should there be a twelve-month interval before the requirement to provide kennels applies?*

**Answer:**

Yes.

Clearly however necessary the provision of track kennels may be, their construction may take some considerable time. It therefore seems not unreasonable to allow tracks a derogation of at least twelve months in which to erect kennels before the requirement to provide kennels comes into force.

**Q17**

*Should identification by both microchip and tattoo be required or is microchipping alone sufficient?*

**Answer:**

At present microchipping alone is unlikely to suffice.

When the current microchipping procedure is followed a small number of microchips become lost or unreadable. It is therefore necessary to have a second means of identification.

To date few microchipped greyhounds have raced on independent tracks and it is unlikely that facilities for reading microchips are available at most independent tracks.

In practice most greyhounds racing in England are imported from the Republic of Ireland where they will have been tattooed and registered in the Irish Greyhound Stud Book [IGSB]. Thus, even if the GBGB were to cease ear-marking greyhounds, most of the young greyhounds starting to trial and race in England would still be ear-marked.

**Q18**

*Do you agree that only databases which reach the standards set in Schedule 1, Part 2 of the draft Statutory Instrument attached at Annex C are appropriate databases for racing greyhounds to be registered on?*

**Answer:**

Yes.

The database which is used to record details of the identity of racing greyhounds should clearly reach the suggested standard. However the Society suggests that details of all racing greyhounds could be collected on a new dedicated central database which could also be used to record details of race and trial performance, injuries [See Condition 6 Questions 22-25 in the Consultation document] and other information, rather than including some greyhound data on the existing databases used to record details of pets, while other data relating to greyhounds is recorded elsewhere.

**Q19**

*Do you agree that track managers should be responsible for ensuring that only greyhounds that are appropriately identified and registered are racing or trialling at their track?*

**Answer:**

Yes.

**Q20**

*Are the details to be recorded - as described in paragraph 5 of Schedule 1 of the draft Statutory Instrument and above – appropriate? Are there any other details that should be recorded?*

**Answer:**

Yes.

Again the Society would suggest that, rather than several types of data being recorded separately, whether electronically or on paper, all could be entered on a single central database which would include not only details of the greyhounds identity but also records of race performance, injury data and so forth.

The S.G.V. would like to suggest that consideration be given to instituting a system of greyhound passports. We note that thoroughbred racehorses all have passports which travel with them at all times and which, besides serving as an identity document for integrity purposes, contains details of changes of ownership, retirement to stud, and of the administration of vaccinations and other medication. In our opinion there is merit in a comparable system for greyhounds, where a document detailing the date of

birth, breeding and markings of the dog, changes of ownership, retirement, vaccinations and other veterinary treatment, and heat periods, matings and pregnancies in the case of bitches, might be retained by the owner or trainer and accompany the greyhound to the track.

**Q21**

*Do you agree that 5 years is an appropriate length of time for records to be kept?*

**Answer:**

Yes.

As the racing career of a greyhound is seldom as long as five years, a five-year mandatory record storage period seems not unreasonable.

**Q22**

*Should both the owner and the trainer of a greyhound be required to produce identification the first time a greyhound runs at a track?*

**Answer:**

The Society feels that it is vital for the integrity of the sport and the welfare of the competing greyhounds that proper records of ownership be kept and all transfers of ownership properly documented, with the regulator imposing meaningful sanctions on individuals who fail to comply. While the S.G.V. is in favour of properly identifying the owners and trainers of racing greyhounds, we do have some reservations as to the practicality of the suggested procedures.

**Q23**

*Do you agree that tracks should be required to keep injury records?*

**Answer:**

Yes.

Epidemiological analysis of injury data may be of value in identifying the cause of some injuries and thus in identifying measures which may be taken to reduce the incidence of injury.

The licensed track veterinarian is the only appropriate person to collect injury data. The data collected at each track should be entered in a standardised format on a single central database.

**Q24**

*Are the details to be recorded – as described in paragraph 6 of Schedule 1 of the draft Statutory Instrument and above – appropriate? Are there any other details that should be recorded.*

**Answer:**

The details to be recorded are to a large extent appropriate but are not sufficient. Many other details could usefully be recorded in addition.

The exact nature of the injury may be difficult to determine in the hot dog soon after the injury has been sustained. The licensed track vet can only make a diagnosis based on a clinical examination, without the benefit of X-rays or other diagnostic aids, and so sometimes only an approximate diagnosis can be made at the track.

The ear-mark [tattoo] of any injured greyhound should be recorded, and its microchip number if applicable.

Recording treatments given may not be of great value. As stated above, a precise diagnosis may not have been made at this stage. Also, in most cases only first aid treatment will be given at the track, and the licensed track vet may not be informed of subsequent treatment so the validity and efficacy of the treatment given at the track may be hard to determine.

Recording the length of the race in which a dog is injured as the sole epidemiological parameter may not be particularly helpful. Some form of record of the circumstances under which the injury was sustained may be more useful – the going allowance, the stage in the race at which injury occurred, whether the dog was balked or knocked over, whether the dog pulled up early or finished the race and similar information. While some of this information may be available from other sources, if it is that injury data is best recorded on a separate database, then some duplication of data is necessary for the sake of completeness.

Ideally details of injuries should be recorded using a standard format throughout the entire industry to aid statistical analysis.

**Q25**

*Do you agree that 10 years is an appropriate length of time for injury records to be kept?*

**Answer:**

Yes.

In general the Society feels that the more data that can be collected over the longest possible period the better, from an epidemiological perspective. A mandatory ten-year retention period for injury records is a start.

**Questions 26-28 Inclusive**

*Questions 26 to 28 deal with an Impact Assessment of the proposed changes, particularly the suggested costs and benefits. As such they deal with matters on which the SGV feels it is not qualified to comment.*

**Q.29**

*Further to any questions on the draft Statutory Instrument already asked in this consultation, do you have any further comments on the draft Statutory Instrument attached at Annex C?*

**Answer:**

No

**Q.30**

*Do you have any comments on the draft guidance attached at Annex D? Is the guidance detailed enough or would it be helpful if the guidance provided a more detailed explanation of all the requirements contained in the regulations?*

**Answer:**

No.

## **[D.] Conclusion:**

The Animal Welfare Act 2006 is perhaps the most significant new piece of animal welfare legislation in the United Kingdom since the passing into law of the Protection of Animals Act 1911. The framing of secondary legislation under the Act should therefore offer an almost unprecedented opportunity for a very extensive review of welfare issues in the greyhound industry and the welfare needs of racing greyhounds. The Society of Greyhound Veterinarians regretfully cannot avoid the conclusion that the current DEFRA Consultation on the Welfare of Greyhounds Regulations 2010 represents a squandered opportunity. Although the Charter for the Racing Greyhound, agreed among industry representatives and welfare groups and launched in May 2002, represents a template for greyhound welfare legislation, the consultation document prefers to confine its attention almost exclusively to discussions of the welfare of greyhounds at racing stadia and pays scant attention to the welfare of greyhounds on breeders' premises, on rearing farms, in trainers' kennels, at schooling and trials tracks, at public greyhound sales or in retirement. In our opinion this is a very significant omission which needs addressed as a matter of urgency before the proposed Statutory Instrument passes into law.

The Society of Greyhound Veterinarians is disappointed that the consultation document offers only one model of greyhound track licensing, the "hybrid" solution first proposed in Lord Donoghue's Independent Review of the Greyhound Industry in Great Britain. We have serious concerns about the ability of this bipartite approach to deliver uniform welfare standards of an acceptable degree across the greyhound racing industry as a whole. Great significance has been laid on the involvement of UKAS in the accreditation of compliance with the proposed Regulations yet it is not clear what standards UKAS will apply, nor is it clear how standards will be monitored at the independent tracks not regulated by GBGB. At a time of rapidly shrinking financial returns in the greyhound industry, a widespread perception that standards were not uniform and that one track licensing arrangement offered a less expensive and lower standard of greyhound welfare that still complied with the law of the land, might there not be an exodus of tracks from one code to the other with a concomitant lowering of welfare standards? We at the Society of Greyhound Veterinarians feel that DEFRA is seeking the endorsement of a plan so far presented only in outline and we would have preferred to see more detailed proposals before having to offer our opinion.

Accordingly, In summary the Society of Greyhound Veterinarians takes this opportunity to press DEFRA to re-open its consultation on the Welfare of Racing Greyhounds Regulations 2010, this time with a far wider remit..

Requests for further information should be directed to Michael Watts MVB MSc MRCVS, Honorary Secretary, Society of Greyhound Veterinarians, Michael Watts MVB MSc MRCVS 38 Manse Road, Glastry, Kircubbin BT22 1DR. Telephone 079 687 924 66 or e-Mail:

[editorsgvnewsletter@googlemail.com](mailto:editorsgvnewsletter@googlemail.com)

Yours in Sport,

The Society of Greyhound Veterinarians Working Group on the DEFRA  
Consultation on the Welfare of Racing Greyhounds Regulations 2010

Frances D. Allen BVMS MRCVS [*SGV Senior Vice-President*]

Hare & Hounds Veterinary Clinic, Sunderland Road,  
Gilesgate, DurhamDH1 1LG

e-Mail: [frances.allen@virgin.net](mailto:frances.allen@virgin.net)

Harry Coulthard BVMS MRCVS

36 Theodore Road, Askern, Doncaster, South Yorkshire DN6 0QG

e-Mail: [handecoulthard@aol.com](mailto:handecoulthard@aol.com)

Diana Hodson BVSc MRCVS

Clegg Hall Farmhouse, Clegg Hall Road, Littelborough,  
near Rochdale, Lancashire OL15 0AA

e-Mail: [tomjowett@aol.com](mailto:tomjowett@aol.com)

Richard Lockyer BVM&S MRCVS [*SGV Junior Vice President*]

Hillside Kennels, 3 Claverhambury Road,  
Waltham Abbey Essex EN9 2BL

e-Mail: [richard@lockyer30.freemove.co.uk](mailto:richard@lockyer30.freemove.co.uk)

Michael Watts MVB MSc MRCVS [*SGV Hon. Secretary*]

38 Manse Road, Glastry, Kircubbin BT22 1DR.

e-Mail: [editorsgvnewsletter@goolemail.com](mailto:editorsgvnewsletter@goolemail.com)

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