

Licensing of Animal Welfare Establishments, Activities and Exhibits

Q1. Your information	
Name:	Christine Dorchak
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Country of Residence:	USA

Q2. Please indicate which of these best represent you
Charity

Q3. Question 1: Do you agree that Animal Welfare Establishments (animal sanctuaries and animal rescue and rehabilitation centres) should be subject to licensing?
No Response

Q4. Question 2: Do you agree that Animal Activities (human engagement services, doggy day care, dog walking, home boarding, livery services etc) should be subject to licensing?
No Response

Q5. Question 3: Do you agree that a licensing scheme be introduced to strengthen existing legislation re animal exhibits i.e. people who take animals to parties such as reptiles, birds of prey centres or other travelling and static animal exhibits?
No Response

Q6. Question 4: Do you agree that owners and/or keepers or trainers of racing dogs (including greyhounds) should be subject to licensing?
No

Q7. Question 5: We are aware of significant public interest in the welfare of racing greyhounds. Further to the above question on the licensing of owners, keepers, or trainers of racing dogs, we seek evidence to justify or negate consideration of a phased ban in future. Please tick the box which most appropriately reflects your opinion on whether a phased ban should be given consideration.
For a phased ban
Please provide your submission and reasoning in the box below and indicate whether your submission is either for or against consideration of a future phased ban Supporting a phased ban. GREY2K USA Worldwide exists to end the cruelty of dog racing. It is our strong belief that the Welsh Government should be working towards ending this gambling-led industry, through a phased ban, rather than licensing it. Licensing dog racing would simply be licensing cruelty. In March 2023, the Scottish Animal Welfare Commission (SAWC) published an independent report into the welfare of greyhounds used for racing in Scotland. This is the most comprehensive review of its kind, and we believe the findings are relevant to this consultation for two reasons. Firstly because the

activity of racing a greyhound around an oval track at speeds of up to 40mph is no different in Wales as it is in Scotland, and secondly because much of the report findings relate to the Greyhound Board of Great Britain (GBGB), the regulatory body which regulates the one remaining track in Wales.

The SAWC report found all racing greyhounds face inherent risk of injury or fatality and other welfare harms, regardless of whether a track is independent or regulated. This inherent risk would remain with no licensing scheme or under any licensing scheme whether it be the GBGB or independent of GBGB through Local Authority or another governing body.

Tracks which are regulated by the GBGB illustrate clearly why licensing does not eradicate the suffering of a racing dog. GBGB figures show that 22,284 injuries were recorded, and 2,718 greyhounds died between 2018-2022. Of the 2,718 dogs that died, 675 of those were destroyed not for medical reasons, but because their treatment was deemed too expensive, they were homeless, designated 'unsuitable for homing', or, effectively, surplus to requirements. Figures collated by Hope Rescue, show Wales' only operational track in Ystrad Mynach, Hengoed surrendered over two hundred dogs to local rescuers between 2018 and 2023.

In 2018, the GBGB made its commitment to 'further protect and promote welfare'. Despite this, in all years since, except 2020 when tracks were temporarily shut due to the Covid-19 pandemic, the injury rate has been higher.

SAWC also noted that GBGB's Welfare Strategy attempts to modify the greyhound to meet human demands, over-interprets preliminary data and is unlikely to have a significant impact on reducing injury rates in racing greyhounds in the foreseeable future. SAWC was also sceptical that GBGB could enforce changes in the industry, as their jurisdiction is limited to the time greyhounds spend at the racetrack and they are reliant upon voluntary contributions from stakeholders.

For 2021, SAWC estimated that any greyhound taking part in GBGB-regulated racing had a 24.1% risk of incurring an injury that year. SAWC also found that racing greyhounds are known to sustain unique injuries that are seldom seen in other dog breeds, and that the risk of injury is significantly higher in the racing greyhound population.

Aside from injuries and fatalities, GBGB's limited jurisdiction means that it cannot effectively regulate the oversupply of puppies and the conditions in which they are reared nor the risks of neglect and poor veterinary care in a post-racing setting. GBGB is incapable of adopting whole-of-life tracking, meaning that greyhounds are left exposed before their racing careers as well as after.

Ultimately SAWC was left unconvinced the GBGB could ensure a good quality of life for greyhounds. SAWC did not see a strong desire in the industry to make the radical changes necessary to mitigate welfare risks and allow for good welfare to be maximised. No licensing scheme could achieve good welfare when the industry itself is unprepared to adopt substantive changes. Thus, SAWC concluded welfare for dogs would be improved if they were not involved in racing.

Based on this evidence, and our extensive experience working to end the greyhound racing industry nationally and internationally, our position is clear - we wish to see a phased end to greyhound racing in Wales.

Our position is also supported by a wealth of public opinion which favours an end to greyhound racing. Recent polling commissioned by GREY2K and conducted by Panelbase shows that 57% of Welsh people think the Welsh Senedd should vote to phase out greyhound racing, while a 2022 petition calling for a ban on greyhound racing in Wales received over 35,000 signatures.

Finally, we wish to make clear that although we answered 'no' to Q4, this is because we do not support licensing but do not want this to be misinterpreted as thinking no action is required. We very much want to see action taken to end greyhound racing.

Q8. Question 6: We would value your view on the effects that any of these proposed changes would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

No Response

Q9. Question 7: Please also explain how you believe any of these changes could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

No Response

Q10. Question 8: We have outlined the issues we are considering with regard to licensing animal establishments, activities and exhibits and considering future regulation of dog racing and have asked you to give specific answers to our questions above. If you have any further comments you would like to make on these issues, please enter in the text box below:

Greyhound racing is cruel and inhumane and clearly out of step with the humane values we all share and for this reason we believe it should be phased out. The life of a racing greyhound is dominated by confinement, limited socialisation, injury and death, drugging, and overbreeding. The second strategic outcome in the Animal Welfare Plan for Wales 2021-2026 states that 'animals should have a good quality of life', it also outlines the five welfare needs of all kept animals:

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

It is clear from the evidence we have provided that greyhounds bred for racing are not afforded these basic welfare needs, and sadly their quality of life is far below the standard of most other companion dogs.

We cannot stress strongly enough the need to consider a phased end over licensing. Opting for licensing over a phased end to greyhound racing provides the opportunity for new tracks to open in Wales at a time when the industry is dwindling. The focus should be on phasing out dog racing in Wales, not creating opportunities for it to be revived which has the potential to allow more dogs to suffer.

While licensing may improve the current situation slightly it will not mitigate the known problems associated with dog racing. Licensing will not put an end to the injuries and deaths that are inherent with the industry. It is unlikely that local authorities will have the capacity to ensure licensing is sufficient in tackling all the animal welfare issues associated with greyhound racing such as doping, inadequate kennel conditions, overbreeding and the possible long-term impact on the dogs involved.

For all these reasons, we believe a phased end to greyhound racing is the only option.

Submit your response

Q11. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

If you want to receive a receipt of your response, please provide an email address.

Email address

christine@grey2kusa.org

Q12. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

