Greyhound welfare

Second Report of Session 2015–16

Report, together with formal minutes relating to the report

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The Environment, Food and Rural Affairs Committee

The Environment, Food and Rural Affairs Committee is appointed by the House of Commons to examine the expenditure, administration, and policy of the Department of Environment, Food and Rural Affairs and associated public bodies.

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The Committee appointed a Sub-Committee on 14 October 2015 to carry out its work on this inquiry.

* Member of the Environment, Food and Rural Affairs Sub-Committee
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Committee staff

The current staff of the Committee are David Weir (Clerk), Matthew Clay (Second Clerk), Sarah Coe (Senior Committee Specialist), Anwen Rees (Committee Specialist), Ellen Bloss (Senior Committee Assistant), Holly Knowles (Committee Assistant), and Nick Davies (Media Officer).

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# Contents

Summary 3

Introduction 5

1 Effectiveness of the regulatory framework 6
   The regulatory framework 6
   Current structure 6
   Scope of the 2010 Regulations 7
   Impact of the Regulations 7
      Strengths of the 2010 Regulations 8
      Weaknesses of the 2010 Regulations 9
   Areas of concern 9

2 Data and transparency 10
   Transparency 10
   Injury and euthanasia data 10
   Drawing comparisons 11
   Current data 11

3 Kennelling 14
   Kennelling standards away from the track 14
      Kennel hands and husbandry 15
      Improving kennel standards 15

4 Retirement: traceability and rehoming 16
   Traceability 16
   Rehoming 16
   Health and rehoming 17

5 Financing welfare and the role of bookmakers 19
   BAGS racing 19
   Voluntary levy 19
   Improving welfare finance 20
      A statutory levy? 22

   Looking forward 24
<table>
<thead>
<tr>
<th>Topic</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conclusions and recommendations</td>
<td>25</td>
</tr>
<tr>
<td>Sub-Committee Formal Minutes</td>
<td>28</td>
</tr>
<tr>
<td>Committee Formal Minutes</td>
<td>29</td>
</tr>
<tr>
<td>Witnesses</td>
<td>30</td>
</tr>
<tr>
<td>Published written evidence</td>
<td>31</td>
</tr>
<tr>
<td>List of Reports from the Committee during the current Parliament</td>
<td>33</td>
</tr>
</tbody>
</table>
Summary

There are around 15,000 active racing greyhounds in the UK today. Their welfare and the effectiveness of the existing regulatory framework are the focus of this report. New regulations on greyhound welfare were introduced in 2010 and are presently being reviewed by the Department for Environment, Food and Rural Affairs.

Our witnesses agreed that the 2010 Regulations have made improvements in the welfare conditions for greyhounds at the racing track. However, it is not possible to definitively say how much improvement has occurred because of an absence of readily available data concerning key welfare indicators, particularly around injuries incurred while racing. Looking at the broader welfare situation we have identified a number of key findings and corresponding recommendations:

- we recommend that Defra amend the 2010 Regulations to require the publication of essential welfare data relating to injury, euthanasia and rehoming numbers;
- bookmakers profiting from greyhound racing in any format (including online or overseas trade) have a responsibility to support greyhound welfare. We regard a statutory levy as the most effective mechanism to achieve this; and
- the 2010 Regulations should be extended beyond racetracks to cover standards at trainers' kennels and include independent verification of those standards by the United Kingdom Accreditation Service (UKAS) and local authorities.

Further areas for Defra’s regulatory review to consider include:

- new kennelling standards should be developed for Greyhound Board of Great Britain-licensed trainers in collaboration with welfare specialists;
- the industry needs to expand its financial support for welfare and consider alternative ways of increasing its revenue;
- creation of a minimum standard of track maintenance and preparation to be enforced across all racing venues—both those regulated by the Greyhound Board of Great Britain and the independent tracks;
- the GBGB Welfare Committee should proactively analyse UKAS inspection data to identify any trends that raise concern. This should feedback into the development of new standards;
- the introduction of random inspections at trainers’ kennels;
- development of industry-wide husbandry standards and provisions for training kennel staff; and
- initiatives to reduce the incidence of poor dental health in racing greyhounds.
Introduction

1. Greyhound racing has taken place in the UK since the 1920s. Although there has been a sustained decline in the sport’s popularity in recent decades, it continues to draw crowds and supported a £1.3 billion off-course turnover for bookmakers in 2014.  

2. The animal welfare standards expected by the public today are higher than at any time in the past. At the heart of this report are the overlapping but sometimes conflicting perspectives of two groups. The industry supports high welfare and integrity standards during a dogs’ racing career, but principally sees greyhounds as commercial betting assets. Welfare groups, on the other hand, prioritise animal well-being and pay less or little attention to the economic pressures on trainers, promoters, and other actors in the industry.

3. The Welfare of Racing Greyhounds Regulations 2010, which this report assesses, arose in part from publicity surrounding a number of media reports into deaths of retired dogs around 10 years ago. These events prompted two inquiries into greyhound welfare in 2007: an independent review of greyhound racing by Lord Donoughue, a Labour peer with a long association with sports governance; and an Associate Parliamentary Group for Animal Welfare inquiry.

4. Since this time the sport’s economic situation has deteriorated and appears increasingly fragile: although declining revenue has to support increased welfare standards this in no way reduces the sport’s responsibility for the welfare of its dogs. The greyhound industry and bookmaking industry are interdependent and must successfully balance their commercial and welfare responsibilities to legitimise continued self-regulation of the sport.

5. This report assesses the effectiveness of the 2010 Regulations since their introduction and their success in safeguarding racing greyhound welfare standards. It will draw examples from other industries, such as horseracing, to compare and contrast the approaches taken. We received a wide range of written and oral submissions and have made two fact-finding visits to race tracks to provide a detailed insight into the current state of greyhound welfare.

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1 Numbers of licensed race courses have more than halved since 1960 whilst independent tracks have gone from 87 to 5 in the same period.
2 Deloitte, 2014. Economic Impact of the British Greyhound Racing industry
3 The Welfare of Racing Greyhounds Regulations 2010
4 See the case of the Seaham greyhound killings.
1 Effectiveness of the regulatory framework

6. This section addresses the effectiveness of the regulatory framework relating to greyhound welfare, and in particular the Welfare of Racing Greyhounds Regulations 2010 (the 2010 Regulations). It sets out the current structure of the regulatory system, reviews the impact of the 2010 Regulations and assesses how effectively they have met their objectives.

The regulatory framework

7. Different aspects of greyhound welfare are covered by different pieces of legislation. The primary piece of legislation relating to all animals under human control is the Animal Welfare Act 2006. This Act covers conditions away from the track, including trainers’ kennels, and means it is an offence to be cruel to a greyhound or not provide for its needs. The 2010 Regulations were made under the Animal Welfare Act and specifically cover conditions at the racing track. The enforcement of the Animal Welfare Act is beyond the scope of this inquiry but we would draw the reader’s attention to a recently launched inquiry that will cover some of these issues.


Current structure

9. Greyhound racing tracks operate within a hybrid or two-tier system. The majority of racing tracks, 24, are licensed by the Greyhound Board of Great Britain (GBGB). This means they operate under GBGB’s ‘Rules of Racing’ and are subject to inspections by the organisation. The standards that the GBGB sets at tracks are also independently accredited by the United Kingdom Accreditation Service (UKAS) and supported by the work of track veterinarians. Any track that meets the required standards may apply to be licensed by the GBGB.

10. In England, there are also around five independent or ‘flapper’ tracks that are not licensed by GBGB, but regulated and inspected by Local Authorities. Independent tracks have seen a notable decline in recent years—there were nine when the 2010 Regulations were introduced. These tracks mostly cater for local hobbyist racing as opposed to GBGB tracks which are large-scale, commercially focused and often televised. Although different licensing arrangements exist, tracks under both systems must comply with the 2010 Regulations.

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6 Animal Welfare Act 2006
7 The Environment, Food and Rural Affairs Committee will inquire into Animal Welfare in 2016.
9 Greyhound Board of Great Britain’s ‘Rules of Racing’
Scope of the 2010 Regulations

11. The aim of the 2010 Regulations was to ensure that:

“all greyhound tracks in England are covered by the same minimum welfare standards and there will be improved traceability of greyhounds.”

Impact of the Regulations

12. The 2010 Regulations introduced five minimum standards for all greyhound tracks in England:

- Veterinary presence at all race meetings, race trials and sales trials; with all greyhounds inspected by the veterinarian before being allowed to run;
- Appropriate facilities for the veterinary surgeon to administer first aid to animals at all tracks;
- Adequate kennelling at all tracks (20% of racing or trialling dogs, from April 2013);
- All racing greyhounds to be microchipped and earmarked; and
- All tracks to maintain records of dogs raced or trialled and injuries occurring at the track for 10 years.

13. The introduction of statutory guidelines has brought minimum welfare standards at independent tracks into line with those at GBGB tracks. Experienced greyhound veterinarians have told us that this made significant improvements to greyhound welfare. The 2010 Regulations put into law many pre-existing welfare standards at GBGB tracks: for instance, veterinarians had been present at GBGB tracks since the 1990s, as had 100% provision of kennels at tracks. Prominent animal welfare organisations also agree that the 2010 Regulations have been a positive step for conditions at tracks. Nevertheless, they are critical that the provisions do not go beyond racing tracks.

14. There is general acceptance that the formalisation of welfare standards at GBGB tracks and the extension of minimum welfare standards to independent tracks contained in the 2010 Regulations has improved the welfare of greyhounds at racetracks.

15. It is, however, difficult to make more than a subjective judgment about the level of the improvement since the 2010 Regulations introduction. The 2010 Regulations’ requirement to collect data on, for example, injuries at tracks, has not been accompanied by a willingness to make that data available for public scrutiny or analysis. We shall cover this issue in further detail in the next Chapter, but must emphasise that the lack of transparency and paucity of publicly available data leaves no clear baseline against which to judge the effectiveness or impact of the 2010 Regulations. Similar conclusions were reported in Defra’s review of the Regulations:

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10 Explanatory memorandum to The Welfare of Racing Greyhound Regulations 2010
11 Department for Food, Agriculture and Rural Affairs (GHW 61) para 2.3
12 Q 54 [Dr. Bentall], Q 56 [Dr. Adams]
“The impact of the regulation on welfare is difficult to assess—there is no transparency in relation to data and statistics which allows comparisons of pre and post regulation.”

16. The absence of baseline data regarding issues such as injuries, euthanasia or rehoming makes it difficult to accurately assess the impact of the 2010 Regulations on key welfare issues.

17. Whilst the 2010 Regulations require that the same minimum standards apply at GBGB-regulated and independent tracks, there are still differences between the two systems.

18. A clear example is the approach to anti-doping testing: GBGB tracks take 9,000 independently tested samples a year, whereas independent tracks do not undertake any formal anti-doping activities. Another difference is apparent in the greater frequency of inspections of GBGB-licensed facilities and their accreditation by an independent body, UKAS. GBGB tracks are subject to annual inspections, by contrast, independent tracks need receive only one mandatory inspection by the relevant Local Authority every three years. This suggests that GBGB tracks may be held to higher standards.

19. The extension of minimum statutory guidelines to all greyhound tracks is welcome. However, significant differences remain between the levels of regulatory oversight of the two systems.

20. We recommend that the frequency of Local Authority inspections of independent tracks be increased and include random inspections.

21. Recognising the limitations of the available data, we have identified two key questions relating to the effectiveness of the 2010 Regulations:

a) Whether adequate standards of greyhound welfare are upheld under the current regulatory framework?

b) Does a self-regulated industry see statutory guidelines as a minimum standard to be proactively built on, or, is meeting the minimum requirement the full extent of their ambition?

Strengths of the 2010 Regulations

22. Despite the difficulties in judging their impact, the 2010 Regulations were praised in the evidence we received for introducing a number of positive requirements. The mandatory presence of a veterinarian for all racing or trialling events is an important step forward, especially at independent tracks, which typically tended not to have them previously. Beyond the 2010 Regulations, the introduction of mandatory microchipping of all dogs from April 2016 should eventually go a long way to ensuring greyhounds can be traced from birth to death. We hope this development will put to rest some of the concerns about the fates of retired greyhounds.
Weaknesses of the 2010 Regulations

23. Even where they believe the Regulations have worked “as far as they go”, many animal welfare charities have criticised them for being limited in scope. Clarissa Baldwin of the Greyhound Forum, for example, told us the regulations were misnamed:

“They are not the Welfare of Racing Greyhounds Regulations. They are for racing greyhounds at tracks”.14

24. Particular areas highlighted by critics as requiring attention include: breeding; importation; transportation; training; kennelling; rearing; trialling; racing; rehoming; euthanasia; and retirement.15 Although as previously stated, many of these areas are covered, specifically or in general, by other legislation (whose enforcement lies outside the scope of this inquiry) a number are covered individually in further detail later in the report.

Areas of concern

25. We have concerns about a number of welfare issues that do not appear to have been fully addressed by the 2010 Regulations. These issues are presented here and expanded upon in more detail in following chapters:

i) Trainers’ kennels, where racing greyhounds spend approximately 95% of their time, are not covered by the 2010 Regulations. Despite their being covered by the Animal Welfare Act, there was a broad consensus across stakeholders, including GBGB senior management and trainers, that extension of the Regulations to include these kennels and incorporate them in the UKAS inspection regime was necessary;

ii) Secondly, the fate of retired dogs unable to be rehomed at the end of their careers is unclear. The Greyhound Forum believes that somewhere between 1,000 to 3,700 dogs are unaccounted for each year.16 The introduction of microchipping should help illuminate this matter. Improved traceability will also depend to some extent on compatibility between GBGB and public pet databases. We believe that greyhounds bred for racing should be traced from birth to death to remove uncertainty over their fate;

iii) A final concern is anecdotal evidence regarding inconsistency in the standards of welfare, and their enforcement, experienced by greyhounds across the country. Dr Hazel Bentall, for example, told us:

“I have seen no evidence that the regulatory framework is consistent and moderated at its levels across the country”.17
2 Data and transparency

Transparency

26. During this inquiry we have found no sources of reliable data regarding greyhound welfare in the public domain. Much of the relevant data required to judge welfare standards is collected by the industry but not shared. This has two significant consequences for both this inquiry and the sport at large. First, it is difficult to accurately assess the current level of welfare provision or to gauge improvements or deteriorations over time. Secondly, the absence of welfare data raises the suspicions of critics and sustains their negative assumptions. We note that the industry fears the data could be selectively used to discredit the industry.

Injury and euthanasia data

27. The main demand for access to data focuses on information relating to injuries, anti-doping activities, euthanasia and rehoming. The 2010 Regulations made it mandatory for all tracks to keep records of greyhounds injured racing. They did not stipulate that the injury records be published, but we believe that was the clear intention of introducing the need to keep them. We are concerned that although collection of injury data has been mandatory for five years there has been no move to put it to greater use.

28. Amongst stakeholders in the sport there is a clear demand for greater transparency:

- Veterinarians consulted in the inquiry unanimously agreed that epidemiological analysis of injury data would improve greyhound welfare;\(^{18}\)
- Rehoming charities told us they would be better able to forecast and plan their business;\(^ {19}\)
- Owners and trainers have stressed they would prefer to know which track may have a higher rate of injuries and also reduce the external criticism of the sport;\(^ {20}\)
- Groups such as the League Against Cruel Sports and others believe the industry is unaccountable and there are considerable welfare problems hidden behind the lack of information.\(^ {21}\)

29. In response, the industry expressed concerns that full disclosure would lead to the data being used against it by critics and those that wish to see an end to the sport, acting as a: “cudgel for our head”\(^{22}\)

30. The GBGB has stated that it is prepared to share with “responsible organisations”.\(^ {23}\) However, the argument that injury data should not be made publicly available as it would lend weight to organisations that seek to ban racing is not conclusive. If the statistics

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\(^{18}\) Q 69 [Dr. Bentall], Q 83 [Dr. Adams]

\(^{19}\) Retired Greyhound Trust (GHW 56) para 4.4.

\(^{20}\) Greyhound Trainers Association (GHW 69), Stanley Wright (GHW 03) and Miss Maureen Day (GHW 14)

\(^{21}\) League Against Cruel Sports (GHW 09), Greyt Exploitations (GHW 68), para 1.2 and Greyhound Awareness Welfare and Protection UK (GHW 64).

\(^{22}\) Q 148 [Mr Faulkner], Q 150 [Mr Curran]

\(^{23}\) Greyhound Board Of Great Britain (GHW 55) para 3.12
reflect a healthy welfare situation, there should be no public outcry in response to their publication.

31. We accept that some information may need to be published in an anonymised or aggregated format on the grounds of commercial sensitivities. Injury data is currently recorded by track veterinarians and collated by the industry. We believe that in order to underwrite the transparent and open behaviour that stakeholders are requesting there is a case for this data to be independently verified. This would go a long way to eliminate the concerns that some parties hold and support continued self-regulation of the sport.

32. We are concerned and surprised that the industry has decided not to publish injury statistics after the 2010 Regulations made their collection mandatory. Data collection was introduced to identify the scale of injuries sustained racing but also to provide a source of information that could be analysed to support prevention in the future. The industry’s reluctance to go beyond the letter of what was required by the regulations in this respect does not inspire confidence in its ability to self-regulate.

**Drawing comparisons**

33. With regard to using data and its potential for improving welfare, useful lessons can be taken from horseracing. The British Horseracing Authority (BHA) is recognised around the world as having implemented a high standard in equine care. In a contrasting approach to that taken by the greyhound industry, injury data for horseracing is made publicly available.

34. Over the last 15 years, the equine fatality rate in British Racing has fallen by a third. The reduction has been achieved, in part, through the electronic collection of injury data and post-race analysis. This data is widely shared with epidemiological specialists who look at tracks or jumps linked with high incidences of injury and proactively recommend remedial action based on the analysis.

35. We believe this is a very positive example of self-regulation supporting high welfare standards and hope it can be emulated within greyhound racing. On this point we welcome the recent appointment by GBGB of Peter Webbon as Chairman of the Welfare Committee, who was previously CEO of the BHA.

**Current data**

36. Injury data is currently collected by tracks and owned by the Racecourse Promoters Association who report this information to the GBGB Welfare Committee and Greyhound Forum (twice a year). For some people the death of even one greyhound resulting from racing is too many, but we recognise that any animal under human control is vulnerable to this fate.

37. Our focus is the scale of injuries and whether all reasonable efforts are being made to avoid preventable deaths. After prolonged conversations the industry has provided the statistics below on injuries and euthanasia.

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24 British Horseracing Authority (GHW 59) para 3.2
25 Q 144 [Mr Curran]
Table 1: Injury and euthanasia data from GBGB tracks

<table>
<thead>
<tr>
<th>Reported Numbers</th>
<th>2012</th>
<th>2013</th>
<th>2014</th>
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<tr>
<td></td>
<td>% of all raced dogs</td>
<td>Number of raced dogs</td>
<td>% of all raced dogs</td>
</tr>
<tr>
<td>Euthanasia</td>
<td>0.12</td>
<td>441</td>
<td>0.13</td>
</tr>
<tr>
<td>Hock &amp; Wrist injuries</td>
<td>0.19</td>
<td>687</td>
<td>0.19</td>
</tr>
</tbody>
</table>

Source: Racecourse Promoters Association

38. The category of ‘Hock and Wrist Injuries’ refers to the most serious and common types of injuries. This category of injury is what the Racecourse Promoter Association records and reports as injury figures to wider stakeholders. The above data is not comprehensive as it is taken from 22 of 24 GBGB-licensed tracks, it does not cover all types of injuries, and it does not include injuries to dogs that manifest later away from the track.

39. We include these figures to encourage the industry to release welfare figures more widely. They are significantly lower and less concerning than the suggested figures welfare groups provided to us. Analysis provided by the welfare organisation Greyt Exploitations, in association with the Sunday Times, of incidents at races over a 10 year period reported that 40,151 dogs were injured and 18,410 did not race again.  

40. GBGB told us it is developing a new centralised database for injury data, to be rolled out during 2016–17. The move to a centralised electronic system will provide a possible source of raw data for sports science and epidemiological studies proposed by many of our witnesses.

41. The development of a centralised database is welcome but should have happened earlier. It will need to be operated in an open and transparent fashion to rebuild trust between the industry and interest groups. Independent validation of injury data would go some way to alleviating the current climate of distrust.

42. There is concern within the industry that the data may be misused. However, the horseracing industry publishes its injury data, and there seems little reason why the greyhound industry should be more at risk of misrepresentation of its data, and unable to refute inaccurate misuse of that data. As one of our witnesses, Dr Hazel Bentall, an independent veterinary surgeon put it: “At no cost to the industry, it could be made available for independent epidemiological research by specialist researchers—not particularly by welfare organisations, but by people whose whole job is looking at anonymised data and drawing conclusions from it. Horseracing has been shown that it can be done and it can be done safely.”

26 ‘40,000 racing greyhounds hurt’
27 Q 69 [Dr. Hazel Bentall]
43. We support the view that the data should be made available for independent research so that any specific injury risk arising from particular tracks or any other identifiable reason may be accurately assessed and dealt with.

44. We recommend that Defra amend the 2010 Regulations to require the publication of essential welfare data relating to injury, euthanasia and rehoming numbers.
3 Kennelling

45. During our inquiry we visited two greyhound tracks: Crayford in South-East London, a GBGB licensed track; and Askern near Doncaster, an independent track. Although kennelling conditions differ at the two types of track we were reassured to find the conditions were of an appropriate standard and overseen by veterinarians at both tracks.

46. Currently GBGB tracks provide 100% kennelling for all racing and trialling dogs whilst independents need provide only ‘adequate kennelling’ (for at least 20% of the dogs present for trialling or racing). Our initial concerns that this was insufficient were allayed by our visit to the Askern track. We found that, in line with Defra Minister Eustice’s understanding, the majority of owners do not use the kennels at independent tracks and the 20% quota is therefore sufficient.28

47. In our view the more pressing welfare issues facing the industry are away from the track. This section will focus on kennelling whilst later sections will address the post-racing life of greyhounds and financial state of the industry.

Kennelling standards away from the track

48. Racing greyhounds spend approximately 95% of their time at trainers’ kennels. These kennels are not covered by the 2010 Regulations or the Boarding Establishments Act 1963 but do come under the remit of the Animal Welfare Act.

49. We have heard kennelling arrangements away from the track differ substantially between the two systems, reflecting their different focuses:

- Independent tracks are predominantly for hobbyists who in our experience may own a small number of dogs they keep at home or at nearby premises. There is no inspection regime for trainers’ and owners’ kennels linked to independent tracks;

- GBGB tracks contract to a number of trainers who provide all the dogs that race there (except at open events). In the case of Crayford, 11 trainers supplied around 350 dogs per week. The commercial focus and scale of these operations means the kennels must be equally extensive, sometimes housing in excess of 100 greyhounds.29 There are 789 GBGB-licensed kennels in the UK, which receive one formal annual licensing inspection by the local Stipendiary Steward and veterinarian, and which may also receive additional inspections as required.30 According to GBGB data, since 2009 each premise has received an average of two visits a year.31

50. We advise Defra to encourage Local Authorities to take a more active role in inspecting private commercial kennel conditions away from the track. It seems appropriate to have the same levels of oversight of private kennels across both systems.

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28 Q 184 [Mr Eustice]
29 Interviews with trainers at the Crayford track visit provided these numbers
30 Greyhound Board Of Great Britain (GHW 55) para 3.5
31 ibid
Kennel hands and husbandry

51. According to a 2014 Deloitte report, trainers make a net loss of £3 million per year. The Greyhound Trainers Association has linked this financial environment to kennel staff and owners working long hours at less than minimum wage and poor kennel conditions. This was echoed by the Race Course Promoters Association:

“We are very close, as an industry, to not being viable and, in particular, not meeting our commitments to our employees, who are trainers and kennel hands”.

52. It is important that greyhound welfare is protected away from the track, that kennel conditions meet an agreed welfare standard, that the training facilities are adequate and that kennel hands receive proper pay and training to carry out their duties.

Improving kennel standards

53. The frequency of GBGB inspections appears robust but welfare groups have expressed worries about the conditions at private kennels, providing us with examples of undercover investigations of kennels that did not appear to meet the current standards set by GBGB.

54. Given reports of poor conditions at some kennels and current financial strain on trainers and owners, we welcome the industry’s acceptance that kennel standards should be independently verified.

55. We support GBGB’s stated aim to raise standards at kennels and intention to work with the British Standards Institute to develop a common standard. We emphasise the need for independent welfare specialists to be included in the drafting of these requirements.

56. We recommend that Defra consider extending the 2010 Regulations to cover trainers’ kennels, that common welfare standards be developed for all kennels, and that an independent body verify those standards.

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32 Economic Impact of the British Greyhound Racing Industry 2014, p.6
33 Greyhound Trainers Association (GHW 69)
34 Q 163 [Mr Curran]
35 Dogs Trust, The Greyhound industry: don’t bet on fair treatment 20 October 2015, League Against Cruel Sports (GHW 09), Greyt Exploitations (GHW 68) para 2, Caged North West (GHW 66)
36 Q 128 [Mr Kelly]
4 Retirement: traceability and rehoming

57. From the outset of the inquiry we have wanted to shed light on what happens to retired greyhounds that are not recorded as being rehomed by charities. In the absence of conclusive evidence, we cannot confirm there is a significant problem. Neither though, can we demonstrate there is not. The Society of Greyhound Veterinarians identified this issue as their key welfare worry:

“... by far the greatest single welfare issue of concern in the U.K. greyhound industry is the euthanasia of healthy greyhounds no longer required for racing.”

Traceability

58. At the moment it is very difficult to track greyhounds bred for racing from birth to death. Recent legislative changes should enable greater certainty over the destiny of dogs in the future. As of April 2016, all dogs in England over the age of eight weeks will have to be microchipped under The Microchipping of Dogs (England) Regulations 2015. Microchipping involves inserting a chip into the dog that contains the owner’s details and a description of the dog’s characteristics. This should improve the traceability of greyhounds.

59. At retirement greyhounds stop being racing animals and transfer to the general pet population. It is key at this point that GBGB verifies the data held on the microchip is accurate. GBGB database information must be compatible with general pet databases, such as the Kennel Club’s, to ensure greyhounds can be accurately tracked in the post racing life. The tracking of greyhounds throughout their lives will provide greater clarity on the question of the ‘unaccounted for dogs’.

60. The introduction of microchipping should significantly improve the tracking of greyhounds bred for racing from birth to death. However, we are conscious that this will require the GBGB database to be compatible with general pet databases.

61. We recommend that GBGB verify the accuracy of the information held on retiring greyhounds’ microchips at the point they exit the industry to support improved traceability throughout their lives.

Rehoming

62. According to GBGB figures there were 14,095 active greyhounds in 2014. The Greyhound Forum, which represents eight major dog charities, estimates that 3,700 of a total 9,000 retired greyhounds go ‘unaccounted’ for each year. The Retired Greyhound Trust (RGT) expects to home over 4,000 greyhounds in 2015 and is by far the largest actor
in the market, with other charities accounting for around 1,500.\textsuperscript{40} We do not have official data on the numbers of greyhounds rehomed each year.

63. Possible destinations at retirement include: rehoming via the RGT; rehoming by other animal charities; adoption into private homes; export to other countries; and euthanasia if the dogs cannot be rehomed owing to temperament or unavailability of places. We accept euthanasia is a possible fate for any animal under human control but believe this must be the last option.

64. Under Rule 18 of the GBGB guidelines, owners are solely responsible for greyhounds at the point of retirement. The decoupling of industry responsibility for greyhound’s post-racing welfare means that industry demand for greyhounds does not take into consideration the cost and number of rehoming placements available in the market. We are not convinced that the current contributions of the industry and the bookmaking sector do enough to support greyhounds. We have been told only one in four rehomed greyhounds is funded by the industry.\textsuperscript{41}

65. \textit{We accept that some ‘unaccounted’ for dogs will have been euthanised if they are unable to be rehomed because of their temperament, and some will have stayed with their owners, but we recommend that healthy dogs should wherever possible be found homes at the end of their racing careers.}

\section*{Health and rehoming}

66. Evidence from voluntary rehoming charities shows a marked increase in expense for rehoming greyhounds in recent years. This has been linked to contraction in the homing market and increased veterinary bills owing to the number of dogs arriving with health problems.\textsuperscript{42} These problems include partial or absent vaccination records or poor dental conditions. Dental health problems appear to be particularly prevalent in all greyhounds. According to one witness, 14\% of the total welfare payments from the industry to the Retired Greyhound Trust is spent on repair of dental disease.\textsuperscript{43}

67. We were told by track veterinarians that the industry was not seen as a desirable area to work in and that there were limited opportunities for training and development. We believe the industry should consider funding professional development courses for track veterinarians to ensure best practice is updated and disseminated.\textsuperscript{44}

68. \textit{The industry should investigate whether poor dental health is prevalent in greyhounds and assess whether there are any measures that could be introduced to improve dental hygiene.}

69. A contracting homing market combined with static industry demand for dogs means more greyhounds are unable to be rehomed and may face being destroyed. A radical approach to the issue of rehoming and oversupply of dogs has been suggested by the League Against Cruel Sports:
“A statutory requirement for tracks, trainers and owners to rehome all greyhounds … the mandatory rehoming of dogs should be a requirement of track licences.”

70. We agree with the underlying premise of this statement, that tracks should make greater financial contributions to rehoming dogs, but recognise that privately owned dogs are the responsibility of their owners.

71. Given improvements at the track linked to recent regulation, the fate of retiring greyhounds that cannot be rehomed is our greatest area of welfare concern. The industry must be transparent about the destiny of retired racers. If the data shows healthy dogs are being put down on a large scale, greater financial support for rehoming activities must be provided.

72. We recommend that data on rehoming is made available and that GBGB consider linking track licences to the operation of effective rehoming schemes or financial provisions to rehoming charities of an equal value.
5 Financing welfare and the role of bookmakers

73. This section identifies a number of pressing issues relating to the financing of greyhound welfare and the role of bookmakers. Greyhounds are bred for the sole purpose of racing, that is, to provide a betting product. In our eyes this means bookmakers have a degree of responsibility to support their post-racing welfare particularly, as the previous chapter identified, in the area of rehoming.

74. The bookmaking industry made a net profit of £237 million from greyhound racing in 2014, at a margin of 18%, significantly higher and less volatile than for a number of other sports. It paid back around £33 million into the greyhound industry. This is divided into two payments: fees for rights to televise races and a voluntary contribution for greyhound welfare.

BAGS racing

75. In 2014, the Bookmakers Afternoon Greyhound Service (BAGS) paid £26 million to tracks for the rights to televise daytime races put on for bookmakers. BAGS currently contracts with 20 tracks to broadcast approximately 29,000 greyhound races a year into UK betting shops. This represents about 55% of the total number of greyhound races run in the UK. The 2007 Lord Donoghue Report into the industry found that:

“If were it not for BAGS, there would no longer be a sustainable licensed greyhound racing industry in Great Britain.”

76. We find no reason to disagree with this statement today. The all-day racing schedules of BAGS requires large numbers of dogs. As seen in the previous chapter, the quantity of dogs entering the industry a year does not appear to correspond with the number of available rehoming places. Another consequence of high demand, as identified by the Donoghue report, is the wastage of those bred for racing but that do not make the grade as racers.

77. BAGS racing supports the majority of all betting income and sustains the continued viability of the sport. However, it also drives high demand for dogs with potentially negative consequences for overbreeding and post-racing welfare.

Voluntary levy

78. The second payment, and primary source of income for GBGB, is the voluntary levy paid by some bookmakers. The levy is collected and managed by the British Greyhound Racing Fund (BGRF) under direction from GBGB. The BGRF estimates that over 90% of licensed bookmaker offices (LBOs) contribute to the fund but states that not all payments

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46 Economic Impact of the British Greyhound Racing Industry 2014, p.6
47 ibid
48 Bookmakers Afternoon Greyhound Service Limited (GHW 57)
51 GBGB make up half of its executive board which is completed by representatives from the bookmaking industry.
from bookmakers include online or overseas trading.\textsuperscript{52} The levy currently stands at 0.6\% of turnover but evidence we received identified a worrying decline in this income stream: in 2015 contributions totalled £6.9 million, down from over £14 million in real terms almost a decade ago.\textsuperscript{53}

\textbf{Graph 1. Declining BGRF Income}

![Graph showing declining BGRF income](image)

Source: Data taken from BGRF written submission to the inquiry\textsuperscript{54}

79. Given the voluntary nature of the levy, there is an inherent risk that the funds provided—the main source of welfare funding—may reduce, or even dry up, at any point. A well-publicised example occurred in 2013 when Betfair, a major online betting exchange, decided to stop making contributions.

80. High welfare standards require financing. We are worried by the decade-long trend of declining income from the voluntary levy paid by bookmakers. We are also concerned that this revenue stream is threatened by the growth of online and overseas betting operations, which do not tend to make the voluntary contribution.

81. \textit{We recommend that changes in the betting consumer market, such as online, mobile and overseas trading, must be better reflected in the regulatory regime. Bookmakers profiting from greyhound racing have a responsibility to support greyhound welfare whether they trade from the High Street or trade online.}

\section*{Improving welfare finance}

82. All welfare activity is dependent on adequate finance. We recognise that the GBGB has tried to protect its welfare budget in a difficult financial climate, even though it has fallen in real terms. In 2015 the welfare allocation by the BGRF was approximately

\textsuperscript{52} British Greyhound Racing Fund (\textit{GHW 27}) para 2.03 - 2.04
\textsuperscript{53} British Greyhound Racing Fund (\textit{GHW 27}) para 2.06
\textsuperscript{54} British Greyhound Racing Fund (\textit{GHW 27})
£2.9 million of a total £6.9 million collected. Numerous submissions to the inquiry questioned why this amount was not greater and why expenditure on areas such as stadia improvements should be prioritised over direct welfare payments.\textsuperscript{35} The graph below sets out the allocation of levy money for the past three years.

**Graph 2. Distribution of BGRF expenditure 2013–2015**

<table>
<thead>
<tr>
<th>£ Millions</th>
<th>2013</th>
<th>2014</th>
<th>2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Commercial</td>
<td>1,152,000</td>
<td>1,008,000</td>
<td>684,480</td>
</tr>
<tr>
<td>Welfare</td>
<td>3,263,000</td>
<td>2,887,300</td>
<td>2,909,190</td>
</tr>
<tr>
<td>Prize money</td>
<td>2,290,000</td>
<td>2,251,700</td>
<td>2,066,200</td>
</tr>
<tr>
<td>Regulatory</td>
<td>1,345,000</td>
<td>1,253,000</td>
<td>1,240,130</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>£8,050,000</strong></td>
<td><strong>£7,400,000</strong></td>
<td><strong>£6,900,000</strong></td>
</tr>
</tbody>
</table>

Source: Data taken from British Greyhound Racing Fund Annual Report 2015\textsuperscript{56}

83. The majority of total rehoming costs are covered independently by charities. The current level of BGRF core funding meets the cost of homing approximately 33% of the number of greyhounds homed by the RGT each year.\textsuperscript{57} It is commendable that charities manage to raise so much from private giving, but we suggest the estimated annual £230 million net profit for bookmakers is sufficient to cater for a more generous contribution.

\textsuperscript{55} Q 69 [Dr. Bentall], Q 72 [Dr Adams] and Greyhound Trainers Association (GHW 69)
\textsuperscript{56} Taken from British Greyhound Racing Fund’s ‘Annual Report and Accounts 2014–15’.
\textsuperscript{57} Retired Greyhound Trust (GHW 56) para 6.7
84. **We recommend that GBGB considers the following options for increasing revenue:**

- **an increase in BAGS payments, which are considerably larger than the voluntary levy, with part of this payment going to welfare not just track owners; and**

- **ensuring more levy monies is spent directly on welfare.**

**A statutory levy?**

85. A strong welfare system requires commensurate financing. A more permanent solution to the issue of welfare finance may be found in the form of a statutory levy. Again, horseracing provides an interesting comparison. The statutory levy paid by bookmakers in horseracing raised around £70 million in 2015 and supports infrastructure improvements, a reduction in injuries, better data and higher prize money.\(^5^9\)

86. Greyhound racing is currently at the whim of bookmakers who may choose to contribute or not. The voluntary system allows bookmakers, like Betfair, to walk away from their responsibilities if the industry tries to increase the levy. It also has the perverse consequence of making those that do contribute less competitive against those that do not. A statutory levy would provide both a more stable income stream for animal welfare activities as well as creating an even playing field between contributing bookmakers.

87. We initially heard from Defra Minister George Eustice that there was a possible case for introducing a statutory levy but that it may contravene European state aid laws.\(^6^0\) Since speaking with colleagues at the Department for Culture, Media and Sport (DCMS) he stated the government has: “no plans to introduce a statutory Levy for the greyhound

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58 [British Greyhound Racing Fund (SHW 27)]


60 Q 196 [Mr Eustice, Defra Minister]
industry”. DCMS Minister Tracy Crouch has contacted the bookmaking industry to raise concerns about the declining contributions and restate the principle that betting operators should make a fair contribution to a sport from which they profit. It is unclear what response these conversations have elicited.

88. We believe government should apply greater pressure to bookmakers to pay a fair reflection of all the profits they make. If a voluntary agreement cannot be struck we recommend that government introduce a statutory levy of 1% of gross turnover. This will ensure the welfare of greyhounds is adequately funded in the future.

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61 Letter received by the Committee, Department of Environment, Food and Rural Affairs (GHW 75)
62 Department for Culture, Media and Sport (GHW 28) para 5.1 In September 2015 the Minister for Sport, Tourism and Heritage, Tracey Crouch MP, wrote to the two main trade bodies representing bookmakers who take bets on British greyhound racing.
6 Self-regulation: a success?

89. The core question this inquiry has faced is whether the current system of significant self-regulation is successfully upholding greyhound welfare. The appropriate level of regulation needs to balance the demands and interests of a commercially viable sport, the hobbyist enthusiast and high welfare standards.

90. At the start of the report we identified two key questions relating to the current legislation: whether it was fully comprehensive and whether the industry could go beyond minimum statutory guidelines.

Looking forward

91. On balance the five years since the introduction of the 2010 Regulations have not witnessed the proactive approach to welfare that would instil confidence. We are disappointed that in general there is little evidence of GBGB going beyond the mandatory requirements to drive up standards in welfare. Aside from the new injury database, to be rolled out throughout 2016–17, there are few other examples of the introduction of higher standards.

92. Without open and transparent data it is difficult to assess how well different aspects of greyhound welfare are being met. In today’s world data is more freely available than any time in the past. The industry’s reluctance to share data is not itself evidence of failings, but its absence has allowed deep-rooted suspicions to flourish. The industry could demonstrate its own commitment in this regard by adopting a more open attitude towards publication of the welfare-related data that it already records, thus encouraging trust in its continued self-regulation.

93. The 2010 Regulations applied the same minimum welfare standards to both GBGB and independent tracks but there remain significant inconsistencies in the welfare standards experienced by greyhounds racing in either of the two track systems. An independent regulator could conceivably enforce consistent and high welfare standards across both track systems, but this would come at significant cost.

94. We have not seen evidence of critical failings that warrant the creation of an independent regulator at this point. We invite the industry to exhibit its ability to respond positively to our recommendations in the interests of both greyhounds and continued self-regulation.

95. We recommend a probationary period of two years continued self-regulation to allow the industry to respond to our proposals. It is vital that the industry demonstrates capacity to initiate welfare reform without legislative compulsion if it wants to stay self-regulated.
Conclusions and recommendations

Impact of the Regulations

1. There is general acceptance that the formalisation of welfare standards at GBGB tracks and the extension of minimum welfare standards to independent tracks contained in the 2010 Regulations has improved the welfare of greyhounds at racetracks. (Paragraph 14)

2. The absence of baseline data regarding issues such as injuries, euthanasia or rehoming makes it difficult to accurately assess the impact of the 2010 Regulations on key welfare issues. (Paragraph 16)

3. The extension of minimum statutory guidelines to all greyhound tracks is welcome. However, significant differences remain between the levels of regulatory oversight of the two systems. (Paragraph 19)

4. We recommend that the frequency of Local Authority inspections of independent tracks be increased and include random inspections. (Paragraph 20)

Injury and euthanasia data

5. We are concerned and surprised that the industry has decided not to publish injury statistics after the 2010 Regulations made their collection mandatory. Data collection was introduced to identify the scale of injuries sustained racing but also to provide a source of information that could be analysed to support prevention in the future. The industry’s reluctance to go beyond the letter of what was required by the regulations in this respect does not inspire confidence in its ability to self-regulate. (Paragraph 32)

Current data

6. The development of a centralised database is welcome but should have happened earlier. It will need to be operated in an open and transparent fashion to rebuild trust between the industry and interest groups. Independent validation of injury data would go some way to alleviating the current climate of distrust. (Paragraph 41)

7. We support the view that the data should be made available for independent research so that any specific injury risk arising from particular tracks or any other identifiable reason may be accurately assessed and dealt with. (Paragraph 43)

8. We recommend that Defra amend the 2010 Regulations to require the publication of essential welfare data relating to injury, euthanasia and rehoming numbers. (Paragraph 44)
Kennelling standards away from the track

9. We advise Defra to encourage Local Authorities to take a more active role in inspecting private commercial kennel conditions away from the track. It seems appropriate to have the same levels of oversight of private kennels across both systems. (Paragraph 50)

10. It is important that greyhound welfare is protected away from the track, that kennel conditions meet an agreed welfare standard, that the training facilities are adequate and that kennel hands receive proper pay and training to carry out their duties. (Paragraph 52)

11. Given reports of poor conditions at some kennels and current financial strain on trainers and owners, we welcome the industry’s acceptance that kennel standards should be independently verified. (Paragraph 54)

12. We recommend that Defra consider extending the 2010 Regulations to cover trainers’ kennels, that common welfare standards be developed for all kennels, and that an independent body verify those standards. (Paragraph 56)

Traceability

13. The introduction of microchipping should significantly improve the tracking of greyhounds bred for racing from birth to death. However, we are conscious that this will require the GBGB database to be compatible with general pet databases. (Paragraph 60)

14. We recommend that GBGB verify the accuracy of the information held on retiring greyhounds’ microchips at the point they exit the industry to support improved traceability throughout their lives. (Paragraph 61)

Rehoming

15. We accept that some ‘unaccounted’ for dogs will have been euthanised if they are unable to be rehomed because of their temperament, and some will have stayed with their owners, but we recommend that healthy dogs should wherever possible be found homes at the end of their racing careers. (Paragraph 65)

Health and rehoming

16. The industry should investigate whether poor dental health is prevalent in greyhounds and assess whether there are any measures that could be introduced to improve dental hygiene. (Paragraph 68)

17. Given improvements at the track linked to recent regulation, the fate of retiring greyhounds that cannot be rehomed is our greatest area of welfare concern. The industry must be transparent about the destiny of retired racers. If the data shows healthy dogs are being put down on a large scale, greater financial support for rehoming activities must be provided. (Paragraph 71)
18. **We recommend that data on rehoming is made available and that GBGB consider linking track licences to the operation of effective rehoming schemes or financial provisions to rehoming charities of an equal value.** (Paragraph 72)

**BAGS racing**

19. **BAGS racing supports the majority of all betting income and sustains the continued viability of the sport. However, it also drives high demand for dogs with potentially negative consequences for overbreeding and post-racing welfare.** (Paragraph 77)

**Voluntary levy**

20. **High welfare standards require financing. We are worried by the decade-long trend of declining income from the voluntary levy paid by bookmakers. We are also concerned that this revenue stream is threatened by the growth of online and overseas betting operations, which do not tend to make the voluntary contribution.** (Paragraph 80)

21. **We recommend that changes in the betting consumer market, such as online, mobile and overseas trading, must be better reflected in the regulatory regime. Bookmakers profiting from greyhound racing have a responsibility to support greyhound welfare whether they trade from the High Street or trade online.** (Paragraph 81)

**Improving welfare finance**

22. **We recommend that GBGB considers the following options for increasing revenue:**

   - an increase in BAGS payments, which are considerably larger than the voluntary levy, with part of this payment going to welfare not just track owners; and
   - ensuring more levy monies is spent directly on welfare. (Paragraph 84)

23. **We believe government should apply greater pressure to bookmakers to pay a fair reflection of all the profits they make. If a voluntary agreement cannot be struck we recommend that government introduce a statutory levy of 1% of gross turnover. This will ensure the welfare of greyhounds is adequately funded in the future.** (Paragraph 88)

**Looking forward**

24. **We have not seen evidence of critical failings that warrant the creation of an independent regulator at this point. We invite the industry to exhibit its ability to respond positively to our recommendations in the interests of both greyhounds and continued self-regulation.** (Paragraph 94)

25. **We recommend a probationary period of two years continued self-regulation to allow the industry to respond to our proposals. It is vital that the industry demonstrates capacity to initiate welfare reform without legislative compulsion if it wants to stay self-regulated.** (Paragraph 95)
Sub-Committee Formal Minutes

Tuesday 9 February 2016

Members present:

Neil Parish, in the Chair

Jim Fitzpatrick
Dr Paul Monaghan
Simon Hart

Draft Report (Greyhound Welfare), proposed by the Chair, brought up and read.

Ordered, That the Draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 95 agreed to.

Summary agreed to.

Resolved, That the Report be the First Report of the Sub-Committee to the Committee.

Ordered, That the Chair make the Report to the Committee

[Adjourned till a date to be confirmed]
Committee Formal Minutes

Wednesday 10 February 2016

Members present:

Neil Parish, in the Chair

Chris Davies  Ms Margaret Ritchie
Jim Fitzpatrick  David Simpson
Simon Hart  Angela Smith
Dr Paul Monaghan  Rishi Sunak

Draft Report (Greyhound Welfare), proposed by the Chair, brought up and read.

Ordered, That the Draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 95 agreed to.

Summary agreed to.

Resolved, That the Report be the Second Report of the Committee to the House.

Ordered, That the Chair make the Report to the House.

Ordered, That embargoed copies of the Report be made available (Standing Order No. 134).

[Adjourned till a date to be confirmed]
Witnesses

The following witnesses gave evidence. Transcripts can be viewed on the Committee’s inquiry page at www.parliament.uk/efracom.

Tuesday 24 November 2015

Clarissa Baldwin, Chief Executive Officer, Greyhound Forum,
Dr Toni Shephard, Head of Policy and Research, League Against Cruel Sports,
Professor Steven Dean, Chairman, Retired Greyhound Trust, and
Emily Burns-Sweeney, Director of Homing, Kennelling and Welfare,
Greyhound Rescue West of England

Dr Simon Adams, Chairman, Association of Greyhound Track Veterinarians, Dr
Andrew Bartholomew, Society of Greyhound Veterinarians and
Dr Hazel Bentall, Veterinarian

Tuesday 8 December 2015

Barry Faulkner, Chief Executive Officer and Tom Kelly, Chairman, Greyhound
Board of Great Britain, Dominic Ford, Chairman, Bookmakers Afternoon
Greyhound Service and John Curran, Director, Racecourse Promoters
Association

George Eustice MP, Minister of State for Farming, Food and Rural Affairs and
Sue Ellis, Deputy Director and Head of the Animal Welfare Team, Defra
Published written evidence

The following written evidence was received and can be viewed on the Committee’s website at [www.parliament.uk/efracom](http://www.parliament.uk/efracom). GHW numbers are generated by the evidence processing system and so may not be complete.

1. Aileen Ward (GHW0048)
2. Association of Greyhound Track Vets (AGTV) (GHW0044)
3. Association of Track Veterinarians (GHW0070)
4. Battersea Dogs & Cats Home (GHW0025)
5. Betty & Butch Ltd (GHW0021)
6. Beverley Harper (GHW0041)
7. Blue Cross (GHW0032)
8. Bookmakers Afternoon Greyhound Service Limited (GHW0057)
9. Bridget Graham (GHW0060)
10. British Greyhound Racing Fund (GHW0027)
11. British Greyhound Racing Fund (GHW0071)
12. British Horseracing Authority (GHW0059)
13. Caged North West (GHW0066)
14. Catherine Lowe (GHW0023)
15. Christopher Cronin (GHW0037)
16. Christopher Snoop (GHW0050)
17. Department for Culture, Media and Sport (GHW0028)
18. Department for Environment, Food and Rural Affairs (GHW0061)
19. Department for Environment, Food and Rural Affairs (GHW0075)
20. Dogs Trust (GHW0029)
21. Dr Damian Allcock (GHW0036)
22. Dr Hazel Bentall (GHW0067)
23. Dr M D (GHW0046)
24. Grey2k USA Worldwide (GHW0001)
25. Greyhound Awareness Welfare and Protection UK (GHW0064)
26. Greyhound Board of Great Britain (GHW0055)
27. Greyhound Compassion (GHW0016)
28. Greyhound Crusaders (GHW0015)
29. Greyhound Forum (GHW0024)
30. Greyhound Rescue West of England (GHW0026)
31. Greyhound Rescue West of England (GHW0072)
32. Greyhound Trainers Association (GHW0069)
33. Greyt Exploitations (GHW0068)
34. Inclusive Lifestyle Fitness (GHW0018)
J S (GHW0038)
Katharine Bird (GHW0062)
League Against Cruel Sports (GHW0009)
Miss J Allcock (GHW0019)
Miss Jenny Yu (GHW0022)
Miss L W (GHW0013)
Miss Laura Slade (GHW0051)
Miss Maureen Day (GHW0014)
Mr Alan Stopford (GHW0065)
Mr Christopher Robertson (GHW0039)
Mr Derek Sheppard (GHW0020)
Mr Ian Moran (GHW0008)
Mr Julian Asher (GHW0035)
Mr Kevin McClements (GHW0043)
Mrs Kay Race (GHW0033)
Mrs Lorraine Baker (GHW0063)
Mrs Maria Lockley (GHW0011)
Ms Lisa Clarke (GHW0006)
Ms Liz Carlton (GHW0002)
Ms Liz Reid (GHW0042)
Ms Lorraine Cannock (GHW0007)
Ms Philippa Jones (GHW0004)
Retired Greyhound Trust (GHW0056)
RSPCA (GHW0030)
Society of Greyhound Veterinarians (GHW0049)
Stanley Wright (GHW0003)
The Association of British Bookmakers (GHW0058)
Tia Greyhound Rescue (GHW0073)
Tia Greyhound Rescue (GHW0074)
Vicki Fowkes (GHW0010)
Wimbledon Greyhound Welfare (GHW0054)
List of Reports from the Committee during the current Parliament

All publications from the Committee are available on the Committee’s website at www.parliament.uk/efracom.

Session 2015–16

First Report  Defra performance in 2014–15  HC 443