

Report on the welfare of greyhounds used for racing in Scotland

Scottish Animal Welfare Commission

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1. Introduction

The Scottish Animal Welfare Commission (SAWC) was established by the Scottish Animal Welfare Commission Regulations 2020, made under section 36 of the Animal Health and Welfare (Scotland) Act 2006. The function of providing advice on the protection of wildlife under section 23 of the Wildlife and Countryside Act 1981 has been assigned by Ministerial declaration.

Further information on the Commission, including reports and minutes of previous meetings, is published when available on the [SAWC web page](#).

SAWC's terms of reference are to focus on the welfare of wild and companion animals in Scotland while also providing scientific and ethical advice to the Scottish Government. The Commission will only consider areas that are within the normal current remit of the UK Animal Welfare Committee and the UK Zoo Expert Committee where these relate to the overall responsibility to consider the welfare needs of sentient animals in all areas of Scottish Government policy or at the specific request of the Scottish Ministers. The Commission will not consider matters that are reserved to the UK Government, including the welfare of animals used in scientific procedures.

The Commission provides written reports and opinions to Scottish Ministers giving practical recommendations based on scientific evidence and ethical considerations on the welfare of sentient animals in Scotland, and the impact of policy on welfare.

2. Scope

This report considers initially the welfare of greyhounds used in racing in Scotland, where possible considering the whole life of the animals, from birth to death and not restricted to the period of time that greyhounds may be involved in racing. Currently the only greyhound racetrack in use in Scotland is independent of the Greyhound Board of Great Britain (GBGB), and not therefore subject to their regulations and policies. As part of this report SAWC considered whether the welfare of dogs at this track was safeguarded. Although there are no current plans to site a GBGB-regulated racetrack in Scotland, or to bring the current track under their auspices, SAWC also considered whether this would improve the welfare of greyhounds involved in racing and whether, hypothetically, this could be an acceptable future development in Scotland.

3. Background and definition of area of analysis

The Rural Affairs, Islands and Natural Environment (RAINE) Committee of Scottish Parliament wrote to SAWC on 29th April 2022 as part of its consideration of a public petition, [PE1758](#), calling for an end to greyhound racing in Scotland submitted by Scotland Against Greyhound Exploitation (SAGE). The Committee asked SAWC for its views on the welfare of greyhounds racing in Scotland generally, specifically its views on unlicensed greyhound tracks operating in Scotland, and what consideration SAWC had given to including the welfare of racing greyhounds in its workplan. Prior to this letter SAWC had already responded to queries about whether it would consider the welfare of racing greyhounds as part of its workplan. At the time SAWC was aware that Dogs Trust and the Royal Society for the Prevention of Cruelty to Animals (RSPCA), had independently commissioned a report into the welfare of greyhounds and did not wish to repeat work that was already being undertaken in this area. SAWC had not undertaken a detailed investigation of the area at the time of the RAINE letter and responded generally to the request for information, in [a letter](#) on 23rd May 2022. Subsequently, the GBGB racetrack at Shawfield Stadium, Glasgow, which had closed temporarily during the COVID pandemic restrictions, did not reopen and plans to demolish that stadium have been raised. This left a single greyhound racing track, Thornton Stadium, in Fife, as the only location in Scotland where greyhound racing takes place. Following a change in policy by Dogs Trust, RSPCA and Blue Cross to call for a phased end to greyhound racing in the UK, and communicated to SAWC and others in September 2022, the RAINE Committee again wrote to SAWC on 31st October 2022 asking for views on the change in policy. In response to this request and to review the work by Dogs Trust, RSPCA and Blue Cross, SAWC implemented a Working Group to address the issue of the welfare of greyhounds used in racing in Scotland.

The focus of SAWC is on the welfare of greyhounds – during the course of our work other public good or impacts were presented by stakeholders in the context of greyhound racing. In the course of the report we will mention those if relevant, but our remit and focus has been solely on the welfare of the dogs. In the debate around this issue the term ‘cruelty’ has frequently been used, sometimes as a synonym for welfare. It is important to emphasise that these are not the same thing. Cruelty is the deliberate or negligent mistreatment of animals, by commission or omission, which causes an animal unnecessary suffering. Animal welfare considers the balance of

positive and negative experiences an animal may have, and whether actions or activities have the potential, on balance, to cause greater negative welfare states than positive ones. In terms of welfare, sometimes termed Quality of Life, we have used the definition presented by SAWC as its guiding principle for conducting its work, that is: ‘the mental and physical state of an individual as it experiences and engages with its environment’ as published at [this link](#). In our consideration of the various issues, therefore, the impact that each has on both the mental and physical state of a greyhound is relevant.

This work has focused on addressing a number of key areas, similar to those posed originally by the RAINE Committee: 1) to formulate a view on the welfare of racing greyhounds in Scotland generally; 2) specifically to consider the welfare of dogs running on unlicensed greyhound racing tracks operating in Scotland; and 3) to consider whether the welfare of greyhounds would be protected by implementing regulatory mechanisms, such as those suggested by GBGB, but not limited to this body.

Description of the issue

Welfare of greyhounds used in racing in Scotland

Greyhound racing has been in decline since its heyday in the 1930s and Scotland now has only one active greyhound stadium. There are no available figures for the number of dogs currently training and racing in Scotland. Anecdotally, there are often insufficient dogs racing in Scotland to hold races more than once a week, sometimes fewer, but dogs can be trained in Scotland and raced in England (e.g., at Newcastle or Sunderland). GBGB figures suggest that in 2021 there were just more than 18,000 greyhounds eligible to race in the UK¹ on GBGB-licensed tracks, with 6,700 new registrations that year, but the number of these dogs based in Scotland is unclear. GBGB confirms that there are 26 licensed trainers operating in Scotland, with varying numbers of dogs per trainer.²

To properly assess the welfare of greyhounds we need to consider the potential for welfare harms or benefits to be experienced by dogs from birth, through training, racing and into retirement. There is a wide range of issues that can impact on their welfare, including the conditions under which dogs are bred, reared, trained, raced, retired, rehomed (if this occurs), and end-of-life care. Also of relevance are the welfare of the parent animals, the loss (sometimes termed “wastage”) of dogs that might be bred to race but never do so, and transport of dogs between breeders, trainers and to and from races.

In our investigation we have also sought to determine if the welfare challenges to racing greyhounds could be amenable to improvement through improved regulation. Within this framework we consider there are welfare problems that dogs may experience as a result of inadequate care or habitual poor practice, which may have become normalised for the industry if this is common practice, or deliberate mistreatment. Examples of this type of welfare issue include aspects of management, poor handling of dogs and the deliberate administration of banned

¹ DT/RSPCA Joint Report (Appendix III)

² GBGB response via email

substances to greyhounds. This category of welfare problems, whilst they may be severe, could still be mitigated by effective regulation, enforcement and training of industry personnel.

There may also be more pernicious and challenging aspects of the welfare of racing greyhounds where the practice is inherently bad for the quality of life of the dogs. For these issues, if they exist, there appears to be less scope for mitigation, and it is unclear if improved regulation could address the issues.

Welfare of dogs running on independent or ‘flapping’ tracks

There are 20 active greyhound racing stadia in the UK, which are regulated by the Greyhound Board of Great Britain³ and two stadia which are independent (one in Wales and one in Scotland). The Welsh Valley Stadium is now in the process of becoming regulated by GBGB (planned for January 2024), so that Scotland will soon be home to the only independent greyhound stadium in the UK. Independent tracks are not affiliated to any governing body, and there is no requirement to collect or publish information on numbers of owners, trainers or greyhounds involved in racing at these tracks, or data on injuries or fatalities at the track. In Scotland the only GBGB-licensed track, Shawfield stadium, is not active, although still listed on the GBGB website. The only active track is the independent track, Thornton Stadium, in Fife.

We specifically considered whether there were particular risks to welfare for dogs running on independent racetracks compared to regulated tracks and whether welfare risks could be mitigated by implementing changes.

Regulation of the welfare of racing greyhounds

In Scotland all dogs, regardless of whether they are racing or not, are covered by the Animal Health and Welfare (Scotland) Act 2006, which requires owners or keepers to exercise a duty of care to the welfare of their animals. In England, the use of racing greyhounds is also subjected to the Welfare of Racing Greyhounds Regulations, 2010. In Scotland, however, there are no special provisions or legislation to cover the commercial use of animals in racing. A statutory Code of Practice for the Welfare of Dogs⁴ also applies to all dogs in Scotland as part of the Animal Health and Welfare (Scotland) Act 2006.

Greyhounds are also subject to a number of other pieces of legislation, including: Welfare of Animals (Transport) (Scotland) Regulations 2006; Microchipping of Dogs (Scotland) Regulations, 2016; Animal Welfare (Licensing of Activities Involving Animals) (Scotland) Regulations 2021. None of these pieces of legislation specifically covers welfare issues relating to dog racing, but they do provide some protections for dogs in all contexts in Scotland.

There are a number of additional initiatives that have focused on attempts to ensure the welfare of greyhounds in racing. A coalition of animal welfare organisations, industry representatives and other stakeholders, the [Greyhound Forum](#) has been established for many years with the aim of improving greyhound welfare. This is an

³ DT/RSPCA Joint Report (Appendix III)

⁴ [Code of practice for the welfare of dogs](#)

advisory body, without a regulatory function, but has driven several changes to improve greyhound welfare, including the Welfare of Racing Greyhounds Regulations (2010) in England, and development of a Code of Practice for trainers' kennels.

Greyhound racing on most racetracks in the UK, with the exception of the independent tracks mentioned above, is self-regulated under the policies and regulation of GBGB. In 2018 this body published [The Greyhound Commitment](#), which introduced initiatives such as the Greyhound Retirement Scheme, Injury Recovery Scheme, and independent kennel inspections. In 2022, GBGB also published a welfare strategy '[A Good Life for Every Greyhound](#)' with a number of recommendations and actions written within the framework of the Five Domains model of animal welfare.⁵

In this area of work we considered the ability of these mechanisms to meet the welfare needs of racing greyhounds and to ensure a good quality of life for greyhounds, considering also the enforcement and powers that any of the non-legislative routes may have in improving the welfare of greyhounds.

4. SAWC evidence gathering and analysis

In gathering evidence to evaluate the welfare of greyhounds used in racing in Scotland SAWC initially conducted a literature search for relevant peer-reviewed publications. In general, there is a paucity of published information on greyhound welfare, and no publications specifically relating to racing in Scotland. A significant percentage of the literature on welfare of racing greyhounds considers Australian racing, which may not be exactly similar to racing in the UK, but we have made use of this literature where general physical or biological principles are explored, or where conditions appear to be similar to those in the UK. The published literature on welfare at racing is almost exclusively focused on welfare of animals in racing and at the track, particularly focusing on track design and injuries, and we were unable to find scientific literature focusing on pre-racing lives of greyhounds, their welfare during training or welfare of retired greyhounds.

To supplement the review of the scientific literature, SAWC also visited the Thornton Stadium in November 2022, where we observed six races, and spoke to the owners of the stadium, owners/trainers of greyhounds taking part in races, members of the public attending, but not with dogs, and the single bookmaker present at the track. Following this visit we received a significant correspondence from attendees or proponents of the activity, who provided their testimony of the role of greyhound racing in their lives, and in some cases evidence for the living conditions of some of the dogs involved (e.g., photographs of greyhounds in the family home and kennelling). In addition, we have met with and taken evidence from a number of bodies involved in the industry of greyhound racing and interested charities or NGOs. The full list of the organisations who gave verbal evidence to SAWC is provided in Appendix II.

⁵ Mellor, DJ, Beausoleil, NJ, Littlewood, KE, McLean, AN, McGreevy, PD, Jones, B, Wilkins, C (2020) The 2020 Five Domains Model: including human-animal interactions in assessments of animal welfare. *Animals*, 10, 1870.

In addition to verbal evidence, SAWC also considered the GBGB documents that are publicly available (particularly the newly published Welfare Strategy) and had access to the independent report produced for Dogs Trust and RSPCA. As this document is not in the public domain we used it for background information only; we have neither directly quoted from it, nor relied on it in formulating our opinions. A summary of the conclusions of this report is given in Appendix III.

5. Outcomes of evidence gathering

Welfare of greyhounds used in racing in GB

Welfare during racing/at the Stadium

Racing greyhounds have been selectively bred for speed and the performance traits required for sprinting, with dogs able to maintain constant average running speeds of 65km/h during races.⁶ Typically, five or six greyhounds race on a purpose-built oval track with a mechanical lure system that the greyhounds chase in an anti-clockwise direction. Racing is conducted over a range of different distances including 100yd (91m), 300yd (274m), 500yd (457m) and 680yd (622m).

Injury and fatalities during racing

Published scientific literature regarding the welfare of greyhounds during races predominantly focuses on injury rate, causes and preventions of injuries. Each year GBGB publishes injury and retirement data from licensed stadia across the UK (Table 1). Currently all racing in Scotland is independent of GBGB and is not required to provide mandatory recording and classification of injuries sustained during racing. Therefore, data from the Scottish track is not included in Table 1.

Table 1 2021 GBGB Injury Data

| GBGB Injury Data 2021 | 2021 – Total Dog Runs 359,083 | |
|-------------------------|-------------------------------|------------------------------------------------|
| | <u>Total Injuries</u> | <u>% of injuries against total runs</u> |
| Hock Injuries | 811 | 0.23 |
| Wrist Injuries | 752 | 0.12 |
| Foot Injuries | 876 | 0.24 |
| Hind Long Bone | 26 | 0.01 |
| Fore Long Bone | 106 | 0.03 |
| Fore Limb Muscle | 414 | 0.12 |
| Hind Limb Muscle | 1,012 | 0.28 |
| Other | 425 | 0.12 |
| | | |
| Total Injuries | 4,422 | 1.23 |
| Track Fatalities | 120 | 0.03 |

(GBGB, 2022b)

⁶ Hayati, H., Eager, D., Stephenson, R., Brown, T. & Arnott, E. (2019) The impact of track related parameters on catastrophic injury rate of racing greyhounds. Proceedings of the 9th Australasian Congress on Applied Mechanics (ACAM9), Sydney, Australia, 2017. 27-29.

GBGB figures are pooled and do not provide stadia-specific evidence for whether participating in some race meets are more hazardous than others. The data are also presented as a proportion of total dog runs and not as a proportion of dogs racing. We are therefore unable to determine accurately the individual risk to each dog of participating in racing, nor to compare these figures to the risk of injury in the companion greyhound population as there is no sensible denominator to allow comparison. However, based on the data that 18,302 dogs were eligible to race in 2021, we estimate that (with the assumption that all dogs eligible to race did race, that all dogs raced an equivalent amount, that each dog would only sustain one injury per year and all dogs are equally at risk of injury or fatality in any given race) that any greyhound taking part in GBGB-regulated racing in 2021 had a 24.1% risk of incurring an injury that year, and a 0.66% risk of dying at the track. The actual figures for some dogs may be considerably higher (if they race more frequently, or race on tracks that are inherently more dangerous). There are also no figures for the number of dogs that are injured in training. It should be noted that racing animals are known to sustain unique injuries that are seldom seen in other breeds of dog, particularly hock injuries of the right hindleg.⁷ Data from 2715 companion greyhounds collected from 626 primary care veterinary clinics in 2016 suggest that 10% of greyhounds had traumatic injuries that might be equivalent to those presented in Table 1, of which nearly a third were claw injuries⁸ (which may be those identified as other above). Whilst not directly comparable it does suggest that the risk of injury is significantly higher in the racing greyhound population.

The GBGB report⁹ highlights that although the injury rate of 1.23% in 2021 is up from 1.12% in 2020 (an increase of 23.7% when considering the increase in the number of dog runs), the number of dogs euthanased on humane grounds at tracks has reduced by 40%, from 200 in 2018 to 120 in 2021.⁹ In some cases, following an injury at the track and an initial examination by the track veterinarian, a greyhound will be taken home by its owner or trainer to be examined by another veterinarian who will either advise further treatment or for the greyhound to be euthanased. The data for 2021 shows that the number of cases where euthanasia is prescribed, following a poor prognosis by an external veterinarian away from the racecourse, has fallen from 144 in 2018 to 74 in 2021.⁹ It should be noted that the severity of the injuries is not included in the data. There are also some reports which describe that most injuries that occur during racing are minor injuries that may not be recorded, and continued racing with such injuries may subsequently result in major injuries.¹⁰ Early detection may help to identify dogs that are at risk of sustaining a racing injury,¹¹ but this may require more thorough diagnostic tools to allow for detection, which are currently not commonly available at racetracks.

⁷ Hayati, H, Eager, D and Walker, P (2019). "The effects of surface compliance on greyhound galloping dynamics." Proceedings of the Institution of Mechanical Engineers, Part K: Journal of Multi-body Dynamics 233, no. 4 (2019): 1033-1043.

⁸ O'Neill, D.G., Rooney, NJ, Brock, C., Church, DB, Brodbelt, DC, Pegram, C. (2019) Greyhounds under general veterinary care in the UK during 2016: demography and common disorders. Canine Genetics and Epidemiology 6, 4.

⁹ [GBGB. 2022b. Independently verified track injury and retirement data for 2021](#)

¹⁰ [APGAW. 2007. The welfare of greyhounds](#)

¹¹ Palmer, A. L., Rogers, C. W., Stafford, K. J., Gal, A. & Bolwell, C. F. 2021. Risk-Factors for Soft-Tissue Injuries, Lacerations and Fractures During Racing in Greyhounds in New Zealand. Front Vet Sci, 8, 737146.

As injuries and fatalities associated with racing in Scotland are not captured in these data, we have only limited evidence of the situation here, and our understanding of this issue is based on verbal reports and several assumptions. Whilst at Thornton Stadium, and confirmed by letter later, we were told that two serious injuries had occurred in that previous year, with one fatality. With 20-30 dogs running per race meet at Thornton (based on 4-6 dogs per race, five races per meet – as observed by SAWC and confirmed in correspondence from Thornton) and one night of racing typically per week, this suggests a broadly comparable figure to those presented in Table 1 (from Thornton's own figures shared with SAWC: 569 dog runs, two serious injuries, one fatality: 0.35% injury risk per dog per run; 0.176% fatality risk per dog per run. Note with such a small sample size, these percentage figures should be interpreted with care). In discussions with owners of dogs at the race meeting it was apparent that at least one dog was recovering from injury and not able to race, but the severity of this injury (believed to musculoskeletal) was not clear.

Numerous factors influence the risk of injuries during racing and include dog genetics, weight, age, sex, speed, weather, month of the year, track design and surface, race distance and starting position.¹² Among the most widely studied risks associated with greyhound racing injuries are those related to running on the bends of an oval track. This is due to a number of reasons including:

- Asymmetric training and racing: as the dogs usually only run in an anti-clockwise direction around bends, they experience greatest force on their left forelimb and right hindlimb, which can cause long-term anatomical adaptations, creating imbalance and weakening of the bone¹³ and leading to increased injuries.¹⁴
- Centrifugal force: which tends to pull greyhounds to the outside of the track, therefore if a greyhound falls. it can easily slam into the outside fence.¹⁵
- Congestion: greyhounds slow down entering the bends, which can result in collisions and falls. An Australian report calculated that approximately 80% of all catastrophic and major injuries were caused by congestion and incidents such as check, collision and galloping.¹⁴
- As sighthounds, greyhounds attempt to keep the lure in view as they enter a bend. This leads to bunching together in the corners (as the lure moves out of sight around the bend), increasing the risk of physical contact between dogs. Dogs then spreads out again on the straight as the lure can be seen by all dogs at this point in the race.

¹² [KNIGHT, A. 2018. Injuries in racing greyhounds](#)

¹³ Hercock, C. A. 2010. Specialisation for fast locomotion: performance, cost and risk. PhD Thesis, University of Liverpool.

¹⁴ [EAGER, D., HAYATI, H. & HOSSAIN, M. 2017. Identifying optimal greyhound track design for greyhound safety and welfare](#)

¹⁵ Eager, D., Zhou, S., Hossain, I., Ishac, K. & Halkon, B. 2022. Research on Impact Attenuation Characteristics of Greyhound Racing Track Padding for Injury Prevention. *Vibration*, 5, 497-512.

It is clear that track design has a significant impact on injury rate,¹⁶ but only by racing on straight tracks would the risks and injuries associated with greyhounds running around bends be eliminated. We are aware that there is at least one commercial straight track in Spain (e.g. [video on YouTube](#)), but none of the tracks in Scotland or the rest of the UK is straight, and inspection of overhead images of racetracks suggest that the degree of curvature of racetracks varies between stadia (Figure 1).

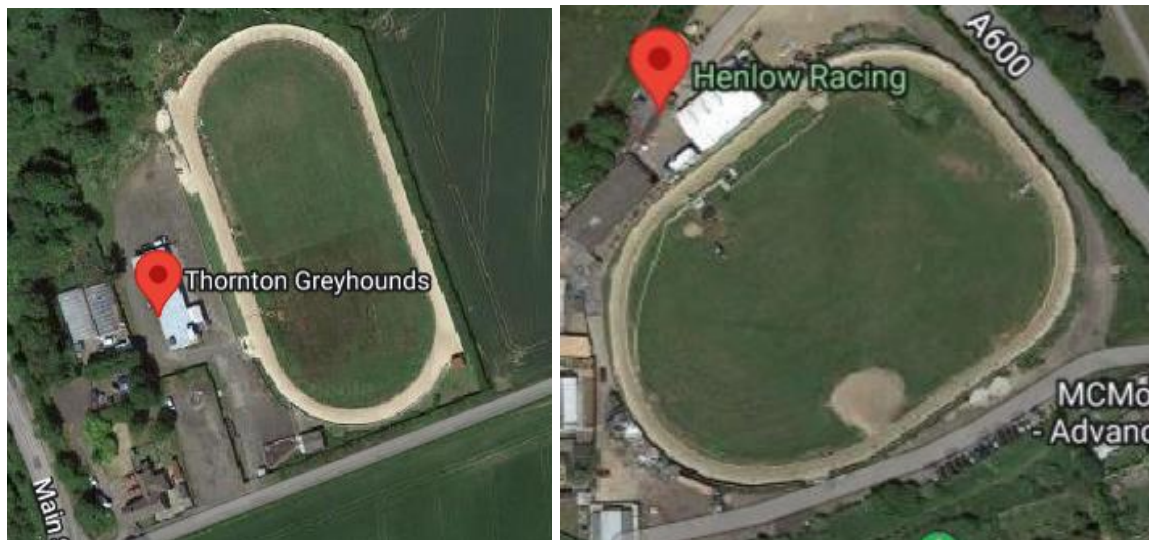


Figure 1. Representative images of two greyhound stadia in the UK, showing the differences in layout and bend curvature, although both require dogs to run anti-clockwise. (source: Google Maps). First image is an aerial shot of Thornton Race Track; Second image is an aerial shot of Henlow Race Track.

Other injuries/diseases reported to be linked to greyhound racing include exercise-induced trauma to the iliopsoas muscle, causing bleeding into the abdomen and retroperitoneal space and leading to sudden death,¹⁷ reports of loose sand from the track being thrown into eyes of following dogs,¹⁴ and exertional rhabdomyopathy ('acidosis' or 'tying up').¹⁸

Mental state of greyhounds when racing

Anecdotal evidence from owners of greyhounds (also expressed to us at Thornton Stadium), veterinarians and the scientific literature¹⁹ depict the greyhounds' love of running. As sight hounds, greyhounds have been bred to specialise in pursuing prey following visual cues (rather than scent) and being able to overcome prey animals through their speed and agility. Modern greyhound racing exploits these adaptations by using a mechanical lure to attract greyhounds to run around the track in pursuit of this simulated prey. It is reasonable to assume that the pursuit phase of the race is

¹⁶ Mahdavi, F., Hossain, M. I., Hayati, H., Eager, D. & Kennedy, P. Track Shape, Resulting Dynamics and Injury Rates of Greyhounds. ASME 2018 International Mechanical Engineering Congress and Exposition, 2018. V013T05A018.

¹⁷ Morey-Matamalas, A., Corbetta, D., Waine, K., Payne, R., Grau-Roma, L. & Baiker, K. 2020. Exercise-induced Acute Abdominal Haemorrhage due to Iliopsoas Trauma in Racing Greyhounds. *Journal of Comparative Pathology*, 177, 42-46.

¹⁸ Molyneux, J. 2005. Vets on track: working as a greyhound vet. *In Practice*, 27, 277-279.

¹⁹ Eager, D., Zhou, S., Hossain, I., Ishac, K. & Halkon, B. 2022. Research on Impact Attenuation Characteristics of Greyhound Racing Track Padding for Injury Prevention. *Vibration*, 5, 497-512.

associated with positive emotional states in dogs, and many dogs engage in chase and pursuit of moving objects suggesting it is a highly motivated behaviour for dogs. Greyhounds have been observed showing signs of anticipation prior to chasing a lure.²⁰ Anticipation is normally associated with positive events, suggesting that greyhounds do enjoy running and chasing 'prey' (the lure).²¹ Some evidence from physiological data collected in greyhounds before and after a high intensity sprint suggested significant elevations in salivary cortisol and heart rate in dogs, when compared to their pre-exercise values.²² Salivary cortisol is a measure of the activation of the hypothalamic-pituitary-adrenal axis, sometimes called a stress axis. Although this is sometimes interpreted as being indicative of a stress response and poor welfare, both measures are typically also elevated in animals following exercise and conditions associated with positive anticipation. Therefore, we consider this cannot provide any useful information regarding the emotional state of the greyhound involved in racing.

Our observation of dogs prior to racing at Thornton did not suggest a high degree of anticipation and motivation to race during the parade phase, although the weather was cold and damp and this may have led to the dogs' subdued demeanour. However, we observed that all dogs were willing to enter the start boxes, requiring little or no persuasion, and no dogs refused to take part in racing. At the end of the race all dogs were able to access the lure and this was associated with the greatest enthusiasm observed in the dogs. It has been suggested²³ that an inability to access the lure at the end of the race can lead to frustration, a negative emotional state, in racing greyhounds, but this was not observed at Thornton. We also observed that a small number of dogs left the lure and ran back to greet their owners/trainers with enthusiasm after the race, indicative of a positive human-animal relationship.

In general, we did not observe any negative contacts between handlers and greyhounds at the racetrack, and some positive or affiliative interactions as described above. We also saw no aggression between dogs or other outcomes indicative of poor welfare. Some dogs spent time in the stadium area with their owners before or after a race, and others were kept in vehicles before and after racing. We did not observe the dogs in these conditions, although research in Australia suggests that time spent in the kennels at the racetrack can contribute to stress at race meets.²³

Other observations of dogs at Thornton Stadium

Dogs appeared fit and in good body condition (although many wore coats so it was not always easy to tell), most seemed quiet and subdued, with low tail posture (which might reflect the damp and cold weather), although none appeared reluctant to race or to enter the boxes ahead of the races. All dogs wore wire-basket muzzles

²⁰ Gillette, R. L., Angle, T. C., Sanders, J. S. & Degraives, F. J. 2011. An evaluation of the physiological affects of anticipation, activity arousal and recovery in sprinting Greyhounds. *Applied Animal Behaviour Science*, 130, 101-106.

²¹ Coppinger, R. & Schneider, R. 1995. Evolution of working dogs. In: SERPELL, J. (ed.) *The domestic dog: Its evolution, behaviour and interactions with people*. Cambridge, England.

²² Dockerty, R.J. (2016) *A multifactoral approach to improving welfare in the racing greyhound*. PhD Thesis, University of Liverpool.

²³ Starling, M., Spurrett, A. & Mcgreevy, P. 2020. A Pilot Study of Methods for Evaluating the Effects of Arousal and Emotional Valence on Performance of Racing Greyhounds. *Animals*, 10, 1037.

for racing, but only a few during the parading phase. A small number of dogs pawed at the muzzle, but most did not appear to show altered behaviour when the muzzle was applied. Approximately 4-5 dogs had visible areas of coat loss, on the haunches and tail, which in some cases looked possibly consistent with rubbing on wire mesh either in kennels or during transport (evenly spaced stripes of hair loss). On GBGB-regulated tracks, random tests for banned substances take place. We did not see this activity at Thornton, and as there is no requirement for publication of data from this track we cannot comment on the incidence of these events or whether any checking takes place. We also did not see any evidence that the fitness to race of the dogs was assessed and instead apparently the owners of the dogs made this decision.

The racetrack at Thornton, like most others, is run anticlockwise around an oval track with the first bend occurring about 100 m into the race. Research into the race and speed profiles of greyhounds suggests that dogs take 80-100 m to accelerate to their maximum speed.²⁴ This means that dogs have achieved their top speed before being subjected to the centrifugal forces of the bend, which is considered to be protective of greyhound welfare as they are only subjected to centrifugal force and not the additional force associated with forward acceleration. However, it does mean that dogs are at maximum speed when they may sustain any collisions. Eager et al (2022)²⁴ advised siting impact pads at the curves to minimise the impact of collision with racetrack fixtures, but these were not observed at Thornton. Racetrack surface is an important contributor to the risk of injury in greyhounds, affecting the impact forces a running dog will experience and its ability to provide traction, while uneven surfaces affect the likelihood of falls.²⁵ In common with all greyhound stadia in the UK, Thornton has a sand track, which is known to provide a better running surface than grass, and we observed that the track was maintained between all the races by dragging a mat over the surface in an attempt to disperse standing water. We were told that salt is sometimes used in winter to prevent the track freezing, which can affect greyhound footpads, but also that the track closed during the worst of the winter weather as the owners could not afford to salt the track. Our observations of the track suggested frequent activity to maintain the track surface when racing was going on, although we are unable to judge whether these effectively mitigated risks for the dogs.

Section summary

In summary, our main concerns for the welfare of greyhounds, when racing, is the risk of serious injury, which in some cases results in euthanasia. This is particularly exacerbated by the way racing is undertaken, around a curved track, which increases the risk of collision and stress damage particularly at the first bend in the track. We have no robust data on injuries from racing in Scotland, but equally have no reason to believe that the risks are any different/lesser in Scotland from elsewhere in the UK. Other aspects of dog welfare, such as condition, general fitness and behaviour, appeared good on observation of dogs at the racetrack. This would be consistent with racing dogs being at their peak in terms of physical health, so as to be able to compete effectively.

²⁴ Eager, D., Zhou, S., Hossain, I., Ishac, K. & Halkon, B. 2022. Research on Impact Attenuation Characteristics of Greyhound Racing Track Padding for Injury Prevention. *Vibration*, 5, 497-512.

²⁵ Hayati, H., Mahdavi, F., Eager, D. (2019) Analysis of agile canine gait characteristics using accelerometry. *Sensors*, 19, 4379

Welfare during training

We were unable to find any scientific literature that looked specifically at welfare issues associated with training greyhounds. The main welfare risks for dogs during this phase of their life is likely to be their living conditions, opportunities for exercise and positive welfare, and methods used in training. However, racing greyhounds reportedly spend as much as 95% of their lives at kennels,²⁶ thus this aspect of their welfare is clearly very important. There are no empirical data on any of these aspects of the life of a greyhound in Scotland, although a single paper has investigated impacts of kennelling in racing greyhounds in Australia.²⁷ Studies in other dog breeds also exist and together suggest that the biggest impact on the welfare of kennelled dogs is lack of social contact, rather than kennel space/exercise, although these aspects are often confounded.

Training for racing greyhounds usually begins at 12 months of age, and typically dogs may race until 48 months old, with some anecdotal evidence that this can be shorter for bitches compared to dogs. Average race performance declines from around 36 months old, suggesting that trainers replace these dogs with younger faster animals. GBGB-regulated tracks typically require dogs eligible for racing to be held in kennels, with 573 licensed residential kennels in the UK in 2022.²⁸ Although there are no active GBGB-licensed racetracks in Scotland, there are a small number of licensed trainers who race their dogs in England. This is also supported by evidence from the Greyhound Awareness League (GAL), which rehomes dogs that are usually given up voluntarily by trainers at or after retirement from racing. They report around 120 Scottish ex-racing greyhounds are rehomed each year, which appears well in excess of the number of dogs in Scottish racing annually.

Anecdotal evidence of the living conditions of Scottish greyhounds was presented to us verbally and by photographs of greyhounds away from the track. For several trainers this represented owning a small number of dogs (generally <5), which were presented to us largely as family pets, which also happened to race, i.e., a dog serving an apparently dual function of companion animal and racing greyhound. Other evidence showed a larger number of dogs (>10) living in kennels, in some cases housed in pairs, although these dogs were also shown interacting positively with family members outside the kennels. In these images the kennels appeared clean, although barren (containing only shavings as a bedding, and no evidence of toys or other enrichments), and dogs appeared relaxed, clean and in good body condition.

Evidence from Scottish SPCA suggests that complaints are received from the public about conditions in some racing greyhound kennels from time to time. Over a five-year period, 21 complaints have been received relating to kennels and nine other complaints in relation to racing greyhounds (some of which refer to Shawfield, which is no longer in operation). To date these complaints have not been upheld, as the conditions, whilst not ideal, have met the minimum standards of the Animal Health and Welfare (Scotland) Act, 2006. However, this may suggest that, although kennels

²⁶ [Hansard - Greyhound Welfare debate on 15 December 2016](#)

²⁷ Jongman, Butler and Hemsworth, (2018), the effect of kennel size and exercise on behaviour and stress physiology of individually housed greyhounds. AABS 199, 29-34.

²⁸ GBGB response via email

in some cases might be providing adequate care, they do not appear compatible with giving dogs a good quality of life.

Welfare at birth and rearing

Racing greyhounds in Scotland and elsewhere in the UK are increasingly sourced from Ireland, with 86.7% of the population being Irish bred in 2021.²⁹ In our conversations with owners/trainers at Thornton all those we spoke to had dogs that had been bred and purchased from Ireland. The greyhound racing industry in Ireland is supported by the Government and there is a perception that the fastest dogs are those produced in Ireland. The registration of greyhound puppies in Ireland is through self-report via the Irish Coursing Club (ICC), when an ear mark and microchip are allocated to each puppy. There is no independent verification of the number of live births and the number of puppies in each litter. Although the Animal Welfare (Licensing of Activities Involving Animals) (Scotland) Regulations 2019 require anyone breeding three or more litters of puppies in Scotland to be registered, these do not apply to breeders in Ireland, and thus there is no regulation of the age at which a breeding bitch is bred, the number of litters per year or in a lifetime, or other constraints on breeding a dog to protect her welfare (Sch 2, para 8(3)).

Calculations based on ICC and GBGB figures suggest that about 10-20% of greyhound puppies bred in Ireland and transferred to the UK (calculated to be about 1894 dogs in 2021) are not licensed with GBGB³⁰, and so are not eligible to race at GBGB racetracks. These dogs may be those then racing on independent tracks, dogs that have not engaged in racing and are being kept as companion animals, and dogs that have been 'lost' in other ways (death, euthanasia, breeding, rehoming, etc.). The lack of any data preclude us from reaching any firm conclusions about the welfare of dogs in early life before they embark on a racing career, or their parents. However, lack of data should not be taken to imply there are no welfare concerns, only that we have insufficient evidence to reach a decision one way or another.

Welfare of dogs after their racing careers are over

As with most aspects of greyhound welfare, except for racing, there is no scientific evidence of the welfare of these dogs that we could find. The Greyhound Awareness League (GAL, the oldest greyhound rehoming charity in Scotland) report that, alongside the other registered charities in Scotland which rehome retired greyhounds, approximately 150 ex-racing dogs are presented for rehoming each year, of which approximately 120 are currently living in Scotland (according to those relinquishing dogs, not independently verified). Dogs may be retired voluntarily from racing (a voluntary decision by a trainer that the dog is no longer running sufficiently competitively), or involuntarily (if a dog receives a career-ending injury). Some dogs, particularly those that (as described above) may be one of only a small number of racing dogs in a home setting, may continue to live as a pet with their owners, once their racing careers are over. However, other dogs are relinquished for rehoming by trainers either immediately when their racing careers end, or after a period of time either as a pet or a non-racing member of a kennel. Evidence from GAL suggests a

²⁹ [2014 independent study by Indecon International Consultants commissioned by the Department of Agriculture, Food and the Marine of the Government of Ireland](#)

³⁰ DT/RSPCA Joint Report (Appendix III)

minority of dogs is rehomed from 'hobby' trainers, with the majority coming from more 'professional' kennels with larger numbers of dogs, which supports this view. GAL commented that dogs commonly arrive for rehoming in poor condition (underweight), with poor dentition, poor coat condition and with high worm and flea burdens. In their opinion, dogs that have been maintained as a 'pet' for a period of time, and those arriving for rehoming from independent rather than regulated tracks, tended to be in poorer condition. In addition, GAL reported that dogs relinquished due to injuries often do not have veterinary records for treatment of injury, which could suggest inadequate or non-treatment. Some injuries are not disclosed and are found upon examination after rescue, again suggesting inadequate veterinary care for injuries.

This evidence suggests that, at least for some professional kennels, once a dog's racing career has ended there is little attention paid to nutrition, health and general care.

Section summary

Overall, and particularly for dogs in Scotland, there are very few data on the welfare of racing greyhounds outside their time at a racetrack. There are significant concerns about the welfare risks to dogs from excessive breeding, which is largely 'invisible' to regulation in the UK as it occurs in Ireland, and in the provision of end-of-racing care. Whilst hobby trainers may provide a good standard of care to their dogs throughout their lives, at least 120 Scottish ex-racing dogs require rehoming each year and may undergo a period of poor welfare before relinquishment.

Are there specific welfare risks for dogs running on independent tracks?

The only active greyhound stadium in Scotland is independent and is not subjected to any regulatory procedures for the welfare of greyhounds other than the laws that apply to all owners/keepers of sentient animals in Scotland. In this section we considered whether this presented specific welfare risks, was neutral or beneficial for the welfare of greyhounds, compared to regulated racing.

In our evidence gathering racing at the independent track in Scotland was represented to us as 'grassroots' racing, or a hobby that allowed owners to have the pleasure of seeing their dogs run, and thus not subjected to the same pressures and welfare issues that have been identified above in more competitive racing. There was, for example, no prize money paid to the winners of races, and the main 'reward' was the satisfaction of having the fastest dog in the field. Whilst we accept that, for some greyhounds racing at independent races, they did have a dual existence as a companion animal and may have a better quality of life at home compared to dogs kept in professional kennels, it was also evident that some dogs had come from larger kennels. Other aspects of the racing environment also argued against this being solely a 'hobby' track; for example, the presence of a bookmaker at the track (and indeed that a race day was cancelled when the on-site bookmaker was ill and unable to attend), handicapping of dogs to increase competitiveness, and the fact that a number of trainers had travelled considerable distances to race their dogs. We are also aware that the owners of Thornton Stadium had applied to GBGB to become regulated, and this had been refused. Therefore, it is of necessity that the track is running as an independent track rather than as a desire to provide opportunity for grassroots racing for the local community. In addition, all dogs

engaged in racing were running anti-clockwise on oval tracks with an inherent risk of injury or fatality, regardless of whether this was independent or regulated.

In the opinion of SAWC, any activity that involves commercial use of animals, carries a risk of exploitation or where the welfare of the animal involved is not the foremost consideration. Therefore, we are strongly of the view that independent regulation or oversight of these activities is required to safeguard the welfare of the animals. For racing greyhounds in Scotland, we have been hampered in making an evaluation of the welfare of dogs through a lack of good quality data, or indeed any data in some areas. In particular, evidence is poor or lacking for the numbers of dogs engaged in racing, their living and training conditions, the circumstances in which they were bred and reared, and their end-of-racing care. Independent regulation of this activity could provide greater transparency and allow a more considered evaluation of greyhound welfare, and whether racing does provide a good quality of care for dogs.

The one area of greyhound welfare where there is some minimal evidence, is the incidence of injury during racing. There is no requirement for independent tracks to collect or publish these data, but we were provided with some, unverified, information about this from the independent track. We are unable to determine with any accuracy if this is greater or lesser than the GBGB figures, and whether this is increasing or decreasing during independent racing. However, the fact that dogs do incur serious injuries, sometimes resulting in euthanasia, at both regulated and independent tracks argues for consideration of track design and whether dogs at an independent track, with no requirement for a veterinarian present, are at risk of unnecessary suffering when injured as prompt veterinary care is not available. We were told that dogs could be taken to a veterinary surgery within five minutes of the track, and there are a number of veterinary surgeries within 5-10 minutes' drive of the stadium, but this could require movement and transport of a seriously injured dog, which would be avoided if a veterinarian were present. In addition, if races typically take place in the evening, all veterinary practices would be closed and the owner of an injured dog would be reliant on the availability of the on-call duty vet to attend the dog, which would inevitably result in a further delay to treatment. It is possible that the increased cost of veterinary call-out charges might also prevent or delay veterinary treatment.

In our discussions with veterinarians, both proponents of greyhound racing and those opposed to it, the overwhelming consensus supported the presence of an experienced, independent veterinarian at trackside during racing. In addition to their ability to provide immediate veterinary care, if required, other important functions were described, including ensuring good biosecurity when dogs from diverse areas come together at the track, ensuring an independent inspection of fitness of dogs to race and empowerment to prevent a dog racing if it was deemed unfit, and oversight of the use of any banned or other substances detrimental to dog welfare. The detail and complexity of the veterinarian role is outlined in the literature, including weight inspection, fitness to race and fit of muzzles and jackets, examination of all injuries and assessments of up-to-date inoculations.³¹ We did not see any evidence that any

³¹ Molyneux, J. 2005. Vets on track: working as a greyhound vet. *In Practice*, 27, 277-279.

of these functions took place by any personnel during our visit to Thornton Stadium, although we were told that the fitness to race was determined by the owners.

Can welfare of racing greyhounds be safeguarded by improved regulation?

In this section we consider more broadly whether greyhound racing can provide good welfare for dogs, and whether, in the future, Scotland might consider having other racetracks, regulated or independent. In this section we particularly reviewed the GBGB Welfare Strategy and Greyhound Commitment as the main evidence for the potential that regulated greyhound racing may occur. However, we do note that the main function of GBGB is to promote the continued existence of greyhound racing, and our preference, as stated above, would be for **independent** oversight and regulation of all activities involved in the commercial use of animals. We also met with GBGB directors, and Dogs Trust and RSPCA as part of our evidence gathering.

Greyhound Welfare Strategy

In response to concerns about the welfare of greyhounds GBGB have made significant changes to attempt to address these issues. In this regard the [Welfare Strategy](#), published in 2022, is the most substantial evidence of the approaches they wish to take in protecting greyhound welfare. This document used the Five Welfare Domains³² Model as the framework for assessing welfare, and set out short-, medium- and longer-term goals for improving greyhound welfare. A number of these activities and potential improvements are very welcome, particularly the desire to increase education and training for those involved in racing, to improve traceability and to improve and increase data collection and the evidence base around greyhound welfare. As we have repeatedly described in this document, there is very limited scientific evidence around greyhound welfare. Any actions to improve this would be very welcome to help ensure that decisions around greyhound welfare are evidence-based.

In terms of the specific areas of greyhound welfare we have reviewed above, it is less clear in our view whether the Welfare Strategy, however well intentioned, is able to achieve significant impact. In terms of the risks of injury received at the track, the Welfare Strategy prioritises increased inspections and veterinary decision-making and will commission new research to address the incidence of injuries. However, as we describe above, one of the key factors in greyhound injury risk is the design of tracks, especially the curvature of tracks where dogs only run in one direction. There is no consideration of whether it is acceptable to continue to expose dogs to this known risk, as acknowledged in the Welfare Strategy, or any evidence that track design might be modified to reduce risk.

In addressing the risks to greyhound welfare of unregulated and indiscriminate overbreeding of greyhound puppies and the unknown conditions under which greyhound puppies are bred and transported to the UK, the Welfare Strategy cites work with the Kennel Club to produce an 'Assured Breeders Scheme' for greyhounds (although this scheme covers all breeds and predates the Welfare Strategy), and that UK greyhound breeding and transport is regulated under the Animal Welfare

³² Mellor, DJ, Beausoleil, NJ, Littlewood, KE, McLean, AN, McGreevy, PD, Jones, B, Wilkins, C (2020) The 2020 Five Domains Model: including human-animal interactions in assessments of animal welfare. *Animals*, 10, 1870.

(Licensing of Activities Involving Animals) (Scotland) Regulations 2021 and Welfare of Animals (Transport) (Scotland) Regulations 2006 (or their English, Welfare and Northern Ireland equivalents). However, as we describe above, the vast majority of dogs arrive in the UK from Irish breeders where none of these measures will have an impact. Although the strategy does express a desire to work with the ICC on this matter, whether this will achieve an impact is yet to be seen. In our discussions with dog owners there appeared to be no incentive to buy British-bred dogs and it was considered routine to import greyhounds for racing from Ireland, even for those who might identify as 'hobby' breeders.

The Welfare Strategy does take seriously the issue of retirement and post-racing-life care of greyhounds and makes a series of welcome recommendations around data collection, rehabilitation and support for owners rehoming greyhounds, as well as provisions for greyhounds that do not engage in racing. However, this commitment was rather undermined by the report from Dogs Trust that GBGB have, since Dogs Trust called for a phased end of greyhound racing in September 2022, stopped providing £400 per rehomed dog to the charity to partially defray the expenses associated with rehabilitation of ex-racing greyhounds. If the welfare of ex-racing dogs at the end of their careers was truly important to GBGB, we would have expected that this commitment to support dogs would continue regardless of where dogs were going to be rehomed.

The Welfare Strategy has a major focus on veterinary care, stakeholder education and nutrition of dogs. However, there is rather less attention given to behavioural issues and the mental state of dogs, even though these are equally important domains in the Five Domains model of welfare. There is a commitment to develop a dog Animal Welfare Assessment Grid ([AWAG](#)) that would allow some data to be collected, which includes the psychological health of the dog. It will be useful to see whether this can indicate an improvement in dog welfare over time, although we note that a common feature of this tool is that data are usually collected by the animal keeper and there is a risk of bias unless this is only to be used by independent assessors of dog welfare. The Welfare Strategy (Chapter 2, pp 29) suggests that the AWAG will be used by owners, breeders and trainers, as well as veterinarians and stewards. Although we agree this can help with welfare engagement when used by owners or trainers, it does also risk unconscious or deliberate bias in the assessment of welfare improvements (for example, if a change is made, a trainer might expect to see an improvement and will be biased towards assessing this as improving welfare).

A significant area of the Welfare Strategy deals with dog resilience, both physical and psychological, and this appears to be the main approach considered for dog behavioural welfare. Although there is a brief mention of working with external experts on providing training in ensuring positive experiences for greyhounds (p.38), much of the planned work in this section focuses on opportunities for genetic selection and using genomic breeding approaches for improved resilience (mostly physical resilience to injuries). A PhD thesis has addressed the issue of genetic selection for race performance in greyhounds, as an approach to reduce the over-

supply of greyhound puppies to the racing industry.³³ This work focused mostly on race performance, which shows high and moderate heritabilities³⁴ for race time and speed, but low for race rank (relative performance relative to other dogs in a race). This suggests that genetic selection can increase running speed in dogs, but the study specifically warns that this may also increase injury rates for dogs, particularly stress fractures. Although the study went on to conduct some preliminary investigations of genomic associations of specific gene regions (SNPs) with the risk of stress fractures, this was a small and underpowered study (as acknowledged by the author) and further work is required to understand if these genomic markers are really associated with the risk of injury or not. Therefore, we have three concerns with this main approach to improving injury rates and resilience in racing greyhounds: 1) the thrust of this work attempts to modify the dog to meet human demands and the environmental stressors placed upon them rather than to address the environmental factors that lead to high levels of stress and injury. In animal welfare science the driver is always the opposite, i.e., to improve the environment to improve animal welfare; 2) the existing data are over-interpreted in the Welfare Strategy, which takes very preliminary data and extrapolates these to suggest that genomic selection is imminently able to make significant impacts on the breeding of racing greyhounds, when the strongest genetic associations are with racing speed, which is likely to have detrimental impacts on welfare and injury rates; and 3) the structure of the breeding of racing greyhounds, and the time taken to bring about genetic changes suggest that this is, at best, a very long-term strategy and unlikely to have a significant impact on injury rates in dogs in the foreseeable future.

Implementation and enforcement of the Welfare Strategy

Our concerns about some aspects of the Welfare Strategy notwithstanding, the value of this document is only achieved if the actions can be realised. We are aware from our discussions with GBGB that funding for more than half of the actions is not in place, and that this is to be sourced from voluntary contributions from bookmakers. GBGB was clear that, if this source of funding was not forthcoming, then the Welfare Strategy could not be implemented. GBGB has since confirmed that the involvement of some bookmakers has been agreed, with discussions still ongoing.

We also have some concerns about the ability of GBGB to enforce changes in the industry. Although it is the regulator, representations from RSPCA suggested that it had only limited powers to compel greyhound stadia to make changes.³⁵ Its jurisdiction is also limited to the time that greyhounds spend at the racetrack, and does not cover the bulk of the life of the greyhound before it arrives at the track, during racing activities away from the track, and at the end of its racing career. Although the Welfare Strategy does have aspirational goals to improve the whole life of the greyhound, we are concerned that there is little power to enforce changes and this will rely on voluntary contributions from stakeholders.

A considerable part of the planned actions to improve greyhound welfare presented by GBGB relies on education and other activities from external collaborators, which are chiefly the charities involved in the Greyhound Forum, Dogs Trust and RSPCA.

³³ Dockerty, R.J. (2016) A multifactoral approach to improving welfare in the racing greyhound. PhD Thesis, University of Liverpool.

³⁴ Heritability = Proportion of an observed trait that is due to genetic effects rather than environmental

³⁵ DT/RSPCA Joint Report (Appendix III)

Representatives from these organisations told us that their involvement in the Welfare Strategy was limited to an initial consultation, and they were not consulted about their educational inputs to deliver the strategy before it was published.³⁵ Whether these will now go ahead, given the change in policy at these organisations, was not clear to us from our conversations with all parties involved.

Section summary

In summary, whilst we were clear that the GBGB directors and the Welfare Strategy were motivated by a desire to improve greyhound welfare, albeit to allow continued racing, we are not convinced that this is sufficient to ensure a good quality of life for greyhounds. We were pleased to see a desire to improve education of those involved, to support future research, data collection and traceability. However, there are some significant gaps, both in funding and support as well as approaches, that we consider have left open the opportunity for greyhound racing to continue much as it does now with no material improvement in greyhound welfare. In particular, there is no mention of track design and how this could improve greyhound safety and reduce injury risk, and the behavioural and psychological health of dogs is given considerably less weight than veterinary matters and physical health.

6. Ethical Analysis and Critical Issues

The summary of our evidence gathering on greyhound welfare suggests there are significant risks of welfare harms to dogs engaging in racing. The most evidence is provided for the risks to injury when racing on the types of tracks that are present in the UK, whilst other risks relate to breeding, life in kennels and retirement/rehoming. Administration of banned substances, whilst also a risk for welfare, is already governed by legislation and we have not considered it here. We also consider that there are opportunities for racing greyhounds to have a good quality of life and agree that dogs can have pleasure from taking part in racing. We consider that all these issues **could** be improved by significantly better independent regulation, traceability and joined-up approaches across countries, as well as radical changes in track design. However, we do not see that there is a strong desire in the industry to make the types of very significant changes that would be needed to mitigate most of the welfare risks and allow for the opportunities for good welfare to be maximised. Therefore, an ethical analysis of dog welfare would conclude that a greyhound would have at least equivalent opportunities for good welfare by not engaging in racing, and fewer risks of poor welfare, so on balance welfare for dogs would be improved, if they were not involved in racing.

A utilitarian ethical approach does allow for welfare harms to occur to animals if the benefits achieved in so doing are sufficiently large to offset the impacts. As a sporting endeavour it is not clear that the benefits of allowing racing to continue do in fact offset the welfare risks. A number of correspondents, who wrote to us, cited improvements in their own mental health in attending greyhound racing at Thornton Stadium, and some mentioned the reduction in other forms of recreation available. Whilst we are sympathetic to this argument, we could not clearly separate if the benefits accrued from having an opportunity to meet with and engage with others with similar interests, rather than deriving directly from seeing dogs racing, or being able to bet on the outcomes. This is also beyond our remit, which is to focus only on the welfare of the dogs, but we mention it here as something worth considering.

An important consideration also in this discussion is whether there is a public desire for greyhound racing to continue in Scotland. Almost everyone present during our visit to Thornton Stadium was either running a dog, and/or had been a trainer/raced dogs or were family members of people racing dogs. There did not appear to be anyone attending without a direct connection to dog racing. A letter received from a supporter of the stadium also cited the decline in public interest and the increasing age of those still attending, suggesting that the industry was already undergoing a sort of voluntary phased end to racing. A survey commissioned by Grey2K, conducted by an independent polling organisation, PanelBase, surveyed members of the general public in Scotland on their views on greyhound racing. The evidence suggests that 63% of Scots have an unfavourable view of greyhound racing and 58% believe greyhounds bred for racing have a poor quality of life. In addition, more than twice as many people said they would vote in favour of ending greyhound racing than opposed it, if a referendum on the matter were to be held (in favour=53%, against=20%, don't know=26%). The evidence suggests that, although greyhound racing is highly valued by a small segment of the population (e.g., 7% of respondents were very positive about greyhound racing), there is little wider public appeal.

7. Conclusions and Recommendations

From the available evidence we consider that the welfare of greyhounds bred for racing is likely to be similar to greyhounds elsewhere in the UK, particularly where greyhounds trained in Scotland actually race in England. The data suggest there are several causes of welfare concern, particularly the risk of injury or death at the track, the oversupply of puppies and the conditions under which they are reared, a significant part of a dog's life that may be spent in kennels with restricted social contacts, and risks of neglect and poor veterinary care once their racing careers are over. This is balanced against the evidence that dogs enjoy the opportunity to run and find the act of chasing a lure rewarding. Although the negative welfare aspects of racing are not insurmountable and could be mitigated through changes in the design of tracks, and greater independent regulation, when dogs are used for commercial gain and gambling, it seems likely that there are some inherent risks where there is the opportunity to make money. We also did not find any evidence that the industry was prepared to make the radical changes that would be required to achieve improved dog welfare.

It is moot whether the current single active greyhound stadium in Scotland could be considered as a commercial endeavour, although some of the conditions described above argue for this, whether it in fact makes an income or not. We accept that some of the dogs running at this track with 'hobby' trainers may have a good quality of life in terms of their normal management and the opportunity to run, although other dogs are likely to have a more restricted home life in kennels and are vulnerable to welfare harms at the end of their racing careers. We also consider that there are still significant risks of unnecessary suffering from injuries sustained whilst racing regardless of other considerations. As a **minimum** requirement, we suggest that an experienced, independent veterinarian should be present when dogs are racing to assess fitness to race (and empowered with the ability to stop a dog racing if necessary), provide immediate care if that should be needed and to provide

independent oversight of dog welfare. We would also suggest that this would allow verifiable metrics to be collected on the numbers of dogs racing, the injury risks and the welfare of those dogs.

If Thornton were to close, Scotland would be in the position of having no organised greyhound racing taking place, which on balance we consider desirable. Although we are unclear if this is likely in the near future, should a phased end to greyhound racing be imposed in England and Wales, it has been argued that this might cause an increased interest in developing new racetracks in Scotland. We strongly recommend against any such future development. There is no evidence that there is popular interest in this occurring in Scotland, and any such move would lead to a reduction in the overall quality of life for dogs in Scotland.

In summary we make the following recommendations:

- 1) Although there are some positive welfare aspects of racing for dogs, where gambling and other commercial activities are present, the risks of poor welfare outweigh the likely positive aspects. Thus, on average, a dog bred for racing in Scotland currently has poorer welfare than the average of other dogs in the population.
- 2) Independent tracks, although they may provide some social benefit, do impose some specific risks on dog welfare through the lack of immediate veterinary care to injured dogs and general veterinary oversight of dog welfare. We consider that a veterinarian **must** always be present when dogs are racing to minimise unnecessary suffering in the event of an injury and should have the power to prevent a dog racing if deemed unfit. The presence of a veterinarian also ensures that there is independent oversight of dog welfare, and we further recommend that this function includes the collection of independent data on injuries and fatalities at stadia. We suggest reviewing these metrics, and whether racing should continue, within the next 3-5 years, to provide the independent evidence that is currently lacking on the impact of racing on dog welfare.
- 3) We recommend that no further new greyhound tracks are permitted in Scotland. We are not convinced that any of the current proposed measures can safeguard greyhound welfare appropriately and believe that this will help to reduce suffering in Scotland.
- 4) Even if there were no racing opportunities available in Scotland, it would remain possible to own, breed, train, and kennel racing greyhounds in the country, notwithstanding that the dogs would have to be taken elsewhere to race. As greyhounds may spend a large amount of their racing lives in kennels, and consistent with our view that independent oversight and regulation is required when there is potential commercial gain, we consider that a scheme independent of GBGB is required to ensure the welfare of these animals, possibly through Local Authority regulation or under the auspices of the new Scottish Veterinary Service.

Appendix I – Membership of the Scottish Animal Welfare Commission

The Scottish Animal Welfare Commission Members are:

- Professor Cathy Dwyer from Scotland's Rural College and the University of Edinburgh (Chair)
- Dr Harvey Carruthers, veterinary surgeon
- Mike Radford, lawyer specialising in Animal Welfare
- Paula Boyden, Veterinary Director at Dogs Trust
- Professor Marie Haskell, Professor in Animal Welfare Science at Scotland's Rural College
- Dr James Yeates, Chief Executive Officer of the World Federation for Animals
- Libby Anderson, Animal Welfare Policy Advisor
- Dr Simon Girling, Head of Veterinary Services, Royal Zoological Society of Scotland
- Mike Flynn, Chief Superintendent at the Scottish SPCA
- Dr Pete Goddard, veterinary surgeon
- Dr Andrew Kitchener, Principal Curator of Vertebrates at the National Museum of Scotland
- Dr Ellie Wigham, Lecturer in Veterinary Public Health, University of Glasgow

Full biographies can be found [here](#).

Appendix II – Acknowledgements

The following organisations and individuals gave verbal evidence to SAWC in the preparation of this report.

Owner of Thornton Stadium, Fife
Greyhound Board of Great Britain (including CEO, and the Veterinary Director)
Independent Director of GBGB with responsibility for welfare (author of the Welfare Strategy)
Dogs Trust
RSPCA
Scottish SPCA
Greyhound Awareness League
Grey2K

We are also grateful to Dr Dan O'Neill of VetCompass at the Royal Veterinary College, London for making data on injuries available to us from the VetCompass database.

Appendix III – Dog’s Trust/RSPCA Joint Report (prepared for SAWC based on the wider report developed for use by Dogs Trust/RSPCA)

A phased end to greyhound racing in the UK

Summary:

- Data pertaining to the remaining Scottish track and the welfare state of greyhounds is particularly lacking as there is no oversight of this track at all. We are therefore reliant on available evidence from other independent and licensed tracks across Great Britain.
- There are a range of concerns associated with the greyhound racing industry including the inherent danger of the sport, welfare challenges associated with every life stage, high wastage and a lack of transparency and traceability.
- It is impossible for each and every greyhound to experience a good life without substantial and widespread reform of the industry. Transforming the industry is severely limited not only by the ongoing lack of consistent and secure funding streams but because of the multinational nature of the industry and inadequate and inconsistent regulatory provisions within each nation.
- GBGB’s welfare strategy is ambitious but fails to fully address the welfare issues throughout the sport, is heavily reliant on other stakeholders to ensure its delivery and is severely lacking in the funding to achieve its aims.
- The UK Greyhound Forum is intended to provide a mechanism to improve greyhound welfare. However, industry representation is limited, as well as the ability of GBGB to act on any welfare recommendations. The scale of improvements needed is so great that we don’t believe it is possible for the forum to affect the change needed.
- Dogs Trust and the RSPCA have concluded that the only option to prevent racing from being inherently dangerous for dogs is to call for a phased end to greyhound racing.

1. Introduction

Dogs Trust and the RSPCA are pleased to provide a written submission setting out our views on greyhound racing to aid SAWC’s evidence gathering process. As SAWC are aware, we have recently conducted internal policy reviews on the welfare of racing greyhounds. As a result of these reviews, we are calling for greyhound racing to come to a phased end in the UK.

Within this submission we have provided our concerns with the racing industry [section 2], how this and other evidence shaped our policy [section 3], our views on the UK Greyhound Forum [section 4] as well as GBGB’s welfare strategy [section 5].

2. Concerns associated with the racing industry

Within this section we have outlined some key concerns associated with the industry. However, it is important to note that for each and every greyhound to experience a good life from birth to death, widespread reform of the industry is needed. For example, this includes a need for independently funded regulatory oversight, a consistent and secure income stream and an industry-wide transition to racing on straight tracks (see Section 3). We do not believe that such wholesale reform is

achievable especially given the multinational and disparate nature of the industry. Taking action on any of the below issues alone, or even a combination, would not be sufficient to enable all greyhounds to live a good life at each and every stage of their lives.

a. Greyhound racing is inherently dangerous for dogs

Greyhound racing is inherently dangerous for the dogs involved. Running at speed around oval tracks causes significant injury to many dogs, and in some cases the injuries are so severe that it is necessary to euthanise the dog as evidenced by GBGB's own data (Table 1).

There is sound evidence from research relating to track-related risks for greyhound injury, including how the track shape, surface, camber (slope), maintenance, starting box design and operation, as well as lure design, have been shown to contribute to racing being inherently dangerous for greyhounds.

Since 2018, following a non-regulatory agreement with Defra, the Greyhound Board of Great Britain has published annual data on injuries, euthanasia and rehoming. This data has shown that significant numbers of greyhounds are injured and euthanased every year (Table 1). However, there is a lack of clarity around these categories making comparisons of change or progress over multiple years very challenging and raising questions around the transparency of the regulated industry. Furthermore, citing the percentage of injuries and deaths as a proportion of dog runs, which is a very large number, means that the percentage results will be very small and therefore the result will always be a low percentage.

Information around the number of tracks, dogs, race meetings, races, times and frequency that an individual dog is raced as well as identification of the tracks at which injury and deaths occurred and when a dog died or was euthanased relative to the last time raced would greatly increase with understanding the results but this is not provided.

Unlike the licensed sector, there is no requirement for injury or fatality data to be published by unlicensed tracks and so the true impact of racing on dogs racing on independent tracks is unknown. In Wales (where there is only one independent track) between 2018 and 2021, Hope Rescue's Amazing Greys project helped 200 greyhounds; 40 of these dogs endured serious, career ending injuries.

Table 1. GBGB data on racing greyhound injuries and euthanasia for 2018 to 2021.

| Year | Total injuries | Total dog runs | % of total injuries against total runs | Number of dogs PTS on humane grounds trackside | Number of dogs PTS due to poor treatment costs/poor prognosis | PTS for humane grounds trackside & treatment costs/poor prognosis as % of total deaths |
|----------------------|----------------|----------------|----------------------------------------|------------------------------------------------|---------------------------------------------------------------|----------------------------------------------------------------------------------------|
| 2018 | 4963 | 426,139 | 1.16 | 242 | 180 | 45 |
| 2019 | 4970 | 410,607 | 1.21 | 207 | 123 | 46 |
| 2020 | 3505 | 318,346 | 1.12 | 200 | 24 | 55 |
| 2021 | 4422 | 359,083 | 1.23 | 120 | 9 | 36 |

b. Lack of a secure and consistent funding source:

We are also concerned with regard to the financial stability of the greyhound racing industry. Unlike the horse racing industry, there is no statutory levy in place for greyhound racing despite much discussion with UK Government departments including the Department for Culture, Media and Sports. Bookmakers do have the option of making voluntary contributions to the industry via the British Greyhound Racing Fund (BGRF), but the voluntary nature of these contributions places the industry in a precarious situation. The contribution from the bookmakers has been set at 0.6% for many years, which at the end of March 2020 equated to £8.8m. However, at the end of March 2021, BGRF reported a decrease of £2m a year and stated that they expected this effect to continue for some time. This will have a profound effect on the funding available for existing and newly proposed welfare initiatives.

Indeed, at the time of the Dogs Trust and RSPCA review, many actions within the GBGB's welfare strategy were unfunded: 46% of short term, 53% of mid term and 80% of long term actions. The absence of funding to realise these goals is concerning and questions the ability for the industry to attain more acceptable welfare standards than currently exist in this current climate and without a significant change in their income source. However, even if the actions were fully funded, the ability for the strategy to achieve a good life for each and every greyhound remains highly doubtful (see Section 5).

A further example of the impact of the lack of funding availability is the Greyhound Retirement Scheme. This scheme releases £400 to rehoming organisations for each greyhound rehomed. However, Dogs Trust data on the veterinary costs to treat 14 injured greyhounds between November 2018 and April 2021 shows that veterinary treatment alone ranged from £690 to £4800. For injured dogs leaving the industry in particular, the £400 is significantly lower than the likely cost required to treat and rehome them.

c. The presence of welfare issues at every stage of the greyhound's life cycle:

There are a myriad of welfare issues reported to affect greyhounds at every stage of their life cycle. To give just some examples, these include the use of artificial insemination for breeding, inadequate socialisation and habituation of puppies as well as tattooing of puppies for identification during rearing, poor environments during schooling, trialling and racing, the use of oestrus suppressants to enable racing, inappropriate transportation at all stages, presence of dental disease and impacts of extreme weather.

d. Inconsistencies in requirements and provisions to protect greyhound welfare:

The greyhound industry is spread across five different nations: the Republic of Ireland, Northern Ireland, Wales, Scotland and England. The regulatory oversight across these nations does not provide a minimum standard for greyhounds that assures a life worth living and there are inconsistencies throughout the different nations. For example, the [Welfare of Racing Greyhound Regulations \(2010\)](#) only apply to England and only to the time greyhounds spend at the race track; not to the other stages of their lives, in particular the trainers' kennels where they spend most of their time. Within nations, there are also inconsistencies. For example, in Scotland the existing track isn't covered by the English regulations, it isn't regulated by GBGB and there is no licensing necessary by the Local Authority meaning that there is no oversight at all.

Despite these types of issues being identified as part of Defra's Post Implementation Review of the Regulations in 2015, the legislation in England has yet to be amended - 8 years after the Post-Implementation Review and 13 years after the legislation was first introduced.

The disparate nature of the industry also limits any impact GBGB can have in making improvements to aspects of a greyhound's life outside the racing stages. For example, within GBGB's welfare strategy, the importance of breeding decisions and early years husbandry to lifetime welfare is acknowledged and is one of the reasons that the strategy extends across greyhound's lifetimes rather than focusing exclusively on the dog's racing career. However, it is also stated that the GBGB is only able to implement the substantial proposals in the document within GBGB's jurisdiction which is Great Britain and the licensed sector. With 85% of greyhounds typically born and raised to a year old in the Republic of Ireland, GBGB's ability to ensure a good standard of welfare across all life stages is very limited.

e. Lack of regulations to cover trainers' kennels:

Regulations in England and GBGB's rules of racing require that kennels must be provided for at least 20% of the total number of greyhounds present at the track at any one time for racing or trialling and that the kennels must meet the requirements set out in the conditions. As the track in Scotland falls outside both these sets of regulations there are no standards to regulate trackside kennels.

Regulations in England do not ensure the welfare of greyhounds outside of tracks, despite greyhounds spending the majority of their time in trainers' kennels, and instead guidance is issued within the Greyhound Board of Great Britain's voluntary code of practice. The extent to which training is provided to aid compliance with the code is unknown as well as how it is enforced. Again, Scotland's track is not

governed by GBGB and so there is no regulatory protection for trackside or trainer's kennels. Given that many greyhounds spend the vast majority of their time in trainers' kennels, this is critical, especially as a Dogs Trust investigation in 2015 provided stark evidence that the current regulations are insufficient to address the welfare concerns associated with trainers' kennels.

f. Lack of transparency and traceability:

Without full transparency relating to the number of dogs being born in, or imported to the UK, registered, and entering the racing industry each year, their subsequent racing longevity and clear exit data (i.e., in clearly defined, explainable and stable categories over time) it is challenging to understand the passage of individual greyhounds and their welfare experience. With most dogs bred, reared and educated on private properties outside of the UK, there is little or no visibility of the whole life experience of greyhounds in the UK racing on GBGB tracks, and even less for greyhounds racing in the independent sector. There is no UK-wide (compatible with Ireland) database for greyhounds; other countries are undertaking national traceability programs (e.g. [The National Horse Traceability Working Group in Australia](#)).

There is no data available about the track in Scotland and even those tracks governed by GBGB do not publicly display or release injury data by racetrack, outcomes of licensing inspections or residential kennel audits. Additionally, no evidence is provided to demonstrate how such information is collated and informs industry development to ensure meaningful changes are made.

g. High levels of wastage:

The issue of oversupply and wastage has long been a concern within the greyhound racing industry. There is no data available about the independent industry although data from GBGB highlights the need to eliminate oversupply and wastage. Data from the last five years shared by GBGB, excluding the dogs that are euthanased or die, shows that by the age of 3.5yo, 50% of greyhounds registered to race have left the licensed racing industry and by the time greyhounds are 4yo only 30% remain. The greyhound lifespan is between 10 and 14 years, however, around 65% of greyhounds leave the licensed racing industry between the ages of 2-4yo and 90% of greyhounds are no longer racing by 5 years of age.

In 2021, there were 12,960 Irish bred puppies registered at the time of whelping yet approximately 10% were not registered at 12 months of age meaning over a 1000 puppies were unaccounted for. In Great Britain similar patterns were seen with around 13% less dogs being registered to race under GBGB compared with numbers of puppies registered on the Greyhound stud book.

h. Reliance on the charity sector for rehoming:

There has been a steadily growing role of rescue and rehoming agencies in finding homes for greyhounds exiting GBGB-licensed racing, which is around 5,000 dogs annually (range 4,297-5,484 per year observed over the last five years). Charities have rehomed over 70% of these greyhounds, with The Greyhound Trust responsible for the majority (3,761 in 2020, plus an additional 157 greyhounds transported from Ireland by Greyhound Racing Ireland for rehoming within the UK).

i. A declining industry:

In the 1940s, there were 77 licensed tracks and more than 200 independent tracks in the UK. The numbers have steadily declined to 23 active regulated and three independent tracks on which greyhounds race in 2022 . The industry has also witnessed a significant long term decline in attendance which has accelerated in recent years. Attendances dropped from 2 million in 2010 to 1.4 million in 2018. Globally, greyhound racing is in decline and only exists legally in seven locations: the UK, Ireland, Australia, New Zealand, the United States of America, Mexico and Vietnam.

3. The development of Dogs Trust and RSPCA policy on Greyhound Racing

As part of our independent review, the following changes were identified which would be necessary to help racing greyhounds experience and be assured of a life worth living:

- Compulsory and independently enforced five domains model-based animal welfare standards for all greyhounds
- One UK wide, Republic of Ireland compatible, microchip based identification and fully
- transparent database allowing real time data to be accessed online and publicly accessible across all life stages.
- Transparent collection and independent verification of birth, death and injury data.
- Accountability for dogs exiting racing
- Independently funded regulatory oversight and enforcement
- Unannounced animal welfare checks and enforcement
- Address oversupply and wastage of greyhounds
- Mandatory education and background animal welfare checks for all participants
- Disciplinary matters to operate independently from commercial and oversight bodies
- Independent regulatory body to proactively address the use of banned substances
- Public reporting of enforcement outcomes
- Action on racetrack safety to eliminate the danger of injury and death. The evidence base
- indicates an industry-wide transition to racing on straight tracks is required.
- Export of greyhounds outside of the UK to be banned
- Funding security for greyhound welfare assurance

Recognising that significant changes are necessary to provide a good life for racing greyhounds, a range of options for future action were identified. The options ranged from continuing to work with industry toward the goal of transparently enforced high welfare standards through to calling for an immediate ban on greyhound racing. As well as identifying the welfare impact of the options and those which could guarantee racing greyhounds a good life, each was also considered with the following in mind:

- the provision of sufficient financial resources for greyhounds at all stages of their life to ensure they experience a life worth living

- impact on employment and alternative careers
- political appetite and
- public attitudes and calls for change.

The outcome of similar options in other geographies were also considered. ***The only options presented within the review that could prevent racing from being inherently dangerous for dogs were those involving a phased end to, or immediate ban on greyhound racing.***

Dogs Trust and RSPCA subsequently separately reviewed and changed their policy positions to call for a phased end to greyhound racing across the UK. We are specifically calling for a phased end to racing rather than an immediate ban so that we can carefully plan and coordinate the care of the many dogs who will be affected. Based on the current rehoming rates and channels, it is expected that an end is feasible within five years given the number of dogs in the industry.

4. The UK Greyhound Forum:

The Greyhound Forum comprises animal welfare organisations and industry bodies working together to improve racing greyhound welfare. Dogs Trust and the RSPCA have been working with the greyhound racing industry for many years to try to improve conditions for the dogs involved in the sport. While this has led to some improvements, the charities believe there are still significant welfare issues for racing greyhounds which have not been resolved and cannot be resolved.

Examples of improvements to welfare which have been achieved via the Forum include the banning of anti-bark muzzles in trainers' kennels. A further example is the development of the GBGB fireworks policy. However, despite the introduction of welfare based policies marking some progress to improve welfare, robust provisions provided by the welfare members are typically rejected by GBGB. Despite being the regulator of the sport it appears their ability to act is limited. For example, when considering the fireworks provisions, they stated that they are unable to stop racing, they can only advise that racing is scheduled sympathetically. Furthermore, although improvements made by the forum have the potential to safeguard greyhound welfare, overall their welfare impact is fairly limited. Issues which have the potential to improve the welfare of all dogs within the industry and to an acceptable standard, for example, changing the shape of the racetrack or ensuring transparent data collection, have not sufficiently progressed and we do not believe that sufficient progress can be made by the Forum in its current form.

We are unconvinced that the current structure of the Forum is sufficient to achieve the significant change needed to resolve these serious welfare concerns. As one example, the industry representation on the Forum is limited to the GB regulated sector only and does not include representatives from RoI or independent tracks (including the independent track in Scotland).

Following a change in policy, there has been much discussion about whether or not Dogs Trust and the RSPCA should remain members of the forum. It has been agreed that both organisations can remain members with the terms of reference revised accordingly although Dogs Trust and RSPCA will not be able to attend parts of the forum meeting where confidential information is being shared which does

suggest that the two organisations are not full members unlike others, and will therefore have limited welfare influence. This arrangement will be revisited once the new approach has been tested over a number of meetings.

5. The GBGB's welfare strategy:

Dogs Trust and the RSPCA have several concerns around the GBGB's welfare strategy. While it is stated that GBGB sought, received and listened to a wide range of views and comments on current and aspirational welfare through engagement with stakeholders including canine welfare charities (members of the Greyhound Forum), our input was very limited and extended to a paper based exercise which invited us to identify welfare issues associated with each stage of the greyhound's life using the five domains welfare framework.

Unfortunately the welfare members of the Forum were not invited to comment on any early drafts of the strategy and were unaware about its publication until its release was imminent. Furthermore, there were no discussions held with Dogs Trust or RSPCA about the need for partnership working to ensure the delivery of the strategy. This reliance on partnership working calls into question the likelihood of, and ability for, the strategy being fulfilled. As such, we are particularly concerned that should the strategy fail to deliver, it would not only be GBGB who are held to account but other stakeholders too.

Having reviewed the strategy and understanding its intention to provide a good life for greyhounds, we are concerned about its failure to consider all the factors likely to affect the welfare state and quality of life of racing greyhounds. For example, actions which would provide behavioural opportunities and improve the dog's emotional state are lacking in comparison to the focus on health and nutrition. Furthermore the need for greyhounds to be psychologically (adaptable to new environments and stressful situations) and physically resilient (breed for resilience rather than speed) suggests that the dog needs to adapt to the industry rather than changing the industry to ensure it is welfare compatible.

There are also very clear omissions from the strategy which, if included, could better protect the welfare of the dogs involved. Greyhound racing is inherently dangerous for the dogs involved and running at speed around oval tracks causes significant injury to many dogs, and in some cases death. The failure to look at changing the shape of the racetrack and in the absence of radical change leaves greyhound racing open to injuries to dogs and unnecessary deaths.

ENDS.

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