

# A Better Bet for Greyhounds



**A Submission to the Welsh Assembly Government in view of proposals to introduce Regulations and a Code of Practice for greyhounds racing in Wales**





## Contents

<b>Chapter 1: Introduction and historical context of the Forum for Wales</b>	<b>3</b>
Forum membership	4
Facts & figures of greyhound racing in Wales	5
Regulations for greyhounds in Wales	5
Further considerations	8
<b>Chapter 2: Proposals for measures to be included within Regulations &amp; a Code of Practice</b>	<b>9</b>
Acknowledgements	9
Policy Context	9
1. Framework	10
2. Track Licence	13
3. Kennel Licence	15
4. Owner/Trainer Licence	15
5. Transport	17
<b>ANNEX A: Examples of proposed Owner/Trainers Licence and associated traceability forms</b>	<b>19</b>
<b>ANNEX B: Guidelines for Good Practice – Kennels</b>	<b>23</b>
<b>ANNEX C: Guidelines for Good Practice – Transport</b>	<b>28</b>



## Chapter 1

### Introduction and historical context of the Forum for Wales

All Party Groups (otherwise known as cross-party groups) are not part of the legislative process but provide a forum for all political parties and the relevant interest groups to hold regular meetings to debate issues. The All Party Group for Animal Welfare was formed in 2000 and, as one of the first All-Party groups within the National Assembly for Wales, it has raised the profile of this type of forum. As the Group is for Assembly Members, interest groups – numbering over forty – retain an associate role and don't hold office or vote.

The fate of greyhounds' post-racing career was the topic at the inaugural meeting of the National Assembly for Wales in 2000. At that meeting it was decided that a survey should be taken of all local authorities in Wales to assess the number of stray greyhounds being picked up over a one-year period.

Once the survey was completed and returned by 19 local authorities in Wales, APGAW produced a report<sup>1</sup> which detailed the six unacceptable fates for greyhounds post-racing career, including being dumped or abandoned for a local authority to pick up. Then in May 2004 a greyhound, 'Last Hope', was found on Fochriw mountain, Caerphilly, with its ears (and therefore the tattoo identification) cut off and it had been shot in the head. It was still alive, but unfortunately the animal had to be put to sleep a short time later by a vet due to its horrific injuries. The vet who examined the dog concluded that the shot to the head could have had occurred days earlier and the dog had remained on the mountain alive and exposed to the elements for some time. An investigation was immediately commenced by the RSPCA with the invaluable assistance of Greyhound Rescue Wales and the Police. As a result of the shocking nature of this case, the joint working of animal welfare organisations and the publicity it received, the perpetrators were identified by information provided by the racing community. The case went to court and Andrew Gough who had mutilated the dog was convicted under the 1911 Protection of Animals Act and was sentenced to 6 months imprisonment as well as being banned from keeping animals for life. Immediately following this RSPCA prosecution and on the back of a new emphasis on closer working to prevent this from happening again, the Greyhound Forum for Wales was officially formed. Lorraine Barrett AM, as Chair of APGAW, established the Forum, which she also chairs, the other members are listed on the next page. Following the outcome of the Andrew Gough case the Forum unanimously agreed that even one dog killed in this way was one too many. The Forum also agreed on approximately figure of 100 dogs a year meeting a similar fate to 'Last Hope' or being killed by their owner.

Since its inception the Forum has been working on a variety of projects to improve animal welfare in racing. Perhaps one of the most important proposals is for a reliable identification method, which would enable each dog to be immediately traced to its owner. All tracks have signed up to this proposal and agreed that no dog should be allowed to race without this level of traceability through, and post, its racing career. The Forum has worked to develop this idea and the associated forms, which can be found in Annex A. Dogs Trust have a fund of approximately £14,000 reserved for the data entry and to develop the database needed to support this scheme. This programme has not been implemented as yet as the Forum would now like to see the scheme a mandatory part of any regulation and/or code of practice under the Animal Welfare Act.

The Forum has also produced a poster and a leaflet<sup>1</sup> to highlight how greyhounds make good pets. These were widely publicised by all tracks, which is a great example of the Forum's co-operative work. There has also been discussion in the group of turning our future focus to developing a guide on best practice for re-homing a greyhound.

Finally the Forum has been developing the details it wishes to see form part of any regulations and code of practice. These are set out in Chapter 2 of this document.

<sup>1</sup> Copies at <http://www.apgawales.org/reports.asp>

## Submission to the Welsh Assembly Government

### Forum membership

Chair		
Lorraine Barrett AM		
Tracks		
Forum member & contact details	Track location	Additional information
<p>Lynne Short            17 Harlech Drive            Castle Park            Merthyr Tydfil CF84 1JU            01685 370858, 07970 019418            lynnshort1959@yahoo.co.uk</p> 	<p>Swansea Greyhound Stadium            Ystrad Road            Fforestfach            Swansea SA5 4NE            01792 579368</p>	<ul style="list-style-type: none"> <li>This track is currently situated on land leased from the local authority</li> <li>Kennels on site</li> <li>Clubhouse on site</li> </ul>
<p>Malcolm Tams            Vale View            Upper Trelyn            Blackwood            Caerphilly NP12 1PD            01443 821373, 07939 259191            mtamsy@aol.com</p> 	<p>Valley Greyhound Track            Tredomen Athletic Club            Ystrad Mynach            Caerphilly</p>	<ul style="list-style-type: none"> <li>The track is leased from the land owners the Tredomen Social Club</li> <li>No kennels on site</li> <li>Clubhouse nearby run by the social club</li> </ul>
<p>Vera Rees            The Bungalow            Bedwellte Greyhound Track            Bedwellte            Nr Blackwood            Caerphilly NP12 0BD            01433 831072</p>	<p>Bedwellte Greyhound Track            Bedwellte            Nr Blackwood            Caerphilly NP12 0BD</p>	<ul style="list-style-type: none"> <li><b>Currently closed and up for sale</b></li> <li>Track was run by owner who lived on site</li> <li>No kennels or clubhouse</li> </ul>
Welfare organisations		
<p>Claire Lawson            Public Affairs Manager            RSPCA Cymru            (APGAW &amp; Greyhound Forum Secretariats)</p>	<p>RSPCA Cymru            PO Box 27            Cardiff CF15 8WZ            Tel 0870 753 8906 or 07976 854166            Clawson@rspca.org.uk</p>	
<p>Alain Thomas            Founder &amp; Public Relations Officer            Greyhound Rescue Wales</p>	<p>Lawnswood            Sandy Lane            Parkmill            Swansea SA3 2EW            Tel: 01792 371413 or 07971 074922            alain.thomas@btinternet.com</p>	
<p>Sian Edwards            Welsh Campaigns Manager            Dogs Trust</p>	<p>Dogs Trust Rehoming Centre            Court Colman Farm            Court Colman            Pen-y-fai            Bridgend            Mid Glamorgan CF31 4NG            Tel 01656 725345 or 07932 114534            sian.edwards@dogstrust.org.uk</p>	



## A Better Bet for Greyhounds



### Facts & figures of greyhound racing in Wales

by agreement of members of the Greyhound Forum for Wales

Numbers of dogs racing regularly in Wales	Between 300 & 400
Numbers of race meetings a week	4 per week across 2 tracks, 7 races per meeting with 5 or 6 dogs in each race
Estimation from this Forum on number of dogs 'missing' every year	The Forum has agreed that this could be 100
Number of dogs abandoned and entering local authority pounds every year	The APGAW survey <a href="http://www.apgawwales.org">www.apgawwales.org</a> found 139 greyhounds abandoned in Wales in one year but contributing factors may be lowering this

### Regulations for greyhounds in Wales



#### Animal Welfare Act – Wales

The Animal Welfare Act<sup>2</sup> 2006, brought into force in England and Wales in 2007, makes owners and keepers of domestic and companion animals responsible for ensuring that the welfare needs of their animals are met. This places a duty of care on the owner/keeper and is enshrined in the five freedoms.

Animals' needs (the five freedoms) include:

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

The Animal Welfare Act also empowers the National Assembly for Wales to make legislation both in the form of Regulations and Codes of Practice. The Forum welcomes the published plans for such measures with regards Greyhound racing and welfare in 2007/8.

This paper sets out the situation as it is at present and the arguments for proper regulation, as viewed by the Forum.

Chapter (2) is an outline of what is needed from the Forum's perspective. Except with regards the issue of mandatory veterinary presence at race meetings, all proposals contained within this document have been unanimously agreed by the Greyhound Forum. Some of these may form part of a regulation, others perhaps would be better suited to a Code of Practice.

Annex A is a detailed description, including the proposed forms, for a full ID programme for all racing Greyhounds linked to the owner through an Owner/Trainer Licence.

<sup>2</sup> [http://new.wales.gov.uk/topics/environmentcountryside/ahw/animal\\_welfare/animalwelfareact/?lang=en](http://new.wales.gov.uk/topics/environmentcountryside/ahw/animal_welfare/animalwelfareact/?lang=en)

Photo: Chris Montana



## Submission to the Welsh Assembly Government

### Background

In recent years there have been three independent tracks operating in Wales, however Bedwellte track (in Caerphilly County Borough) is currently closed and up for sale. 'Independent' within Greyhound Racing means those tracks that are not governed by the National Greyhound Racing Club (NGRC). They are also sometimes referred to as 'flapping tracks'. The NGRC is a self-regulating system and is mostly centred on governing the fairness and rules of racing, but it does recognise the importance of welfare and has, in recent years, attempted to improve standards. With no NGRC or other forms of regulation, the tracks in Wales have operated as private businesses and have been subject to Gaming Licence requirements only.

### Why a special case for Wales?

The Forum is of the opinion that those concerned with racing and its proposed regulation in England have largely ignored the issues that the independent racing sector presents. In his oral evidence to the EFRA committee scrutinising the Draft Animal Welfare Bill, Lord Lipsey, Chairman of the British Greyhound Racing Board, said "...But that does bring me back to the question of independents which was raised and which we did not tackle directly. My own view, if you look at the nature of most of these independent tracks is that they are disappearing at a rate of knots. They are mostly man and boy and, as time goes by, they go out of business at a rate of knots, as I say. In my view, there are only two courses for them: go out of business or join the NGRC with all the regulation that that implies."<sup>3</sup> Whilst it is possible that new regulations could force independents out of business, this is not true of all. In addition, as NGRC is non-governmental, it is our opinion that independent tracks should not be forced to join. This, by definition, leaves an independent sector in need of regulation. Many feel this is important to the industry as it gives greyhounds a longer career as many start in NGRC tracks but finish their career in the independent sector where owners are more likely to keep their greyhound as a pet after racing. The animal is also more likely to be housed in the family home and perhaps have a less stressing race schedule.

<sup>3</sup> <http://www.publications.parliament.uk/pa/cm200405/cmselect/cmenvfru/52/52ii.pdf> [EV232]



### Proposals for England?

The future of any Regulation or Code of Practice in England for Greyhounds is as yet undetermined. There have been a number of reasons for this. In particular, the media coverage of the Co Durham case, where it is alleged an individual killed 10,000 greyhounds (at the owner's request) when they had no further use, has led to two inquiries. The first was by the Associate Parliamentary Group for Animal Welfare who investigated the general welfare issues faced by greyhounds racing in England, the report can be found at [www.apgaw.org](http://www.apgaw.org). The second inquiry is on-going and is being conducted by Lord Donoughue on behalf of the industry. Many welfare organisations believe the Co Durham case vindicates their long held view that the NGRC should not be ensuring welfare standards and indeed that self-regulation as a principle is inherently flawed.

APGAW Wales has participated in the debate in England, in both the UK Greyhound Forum<sup>4</sup> and the APGAW Westminster inquiry, which led to both written and verbal evidence<sup>5</sup> in the latter case. Both APGAW Wales and the Greyhound Forum for Wales would be happy to share any information with our English counterparts. In particular the Forum for Wales is mapping greyhound fates by surveying vets and animal rescue organisations and, with the Welsh Assembly Government's help, re-surveying the local authorities in the near future.

Wales only has independent tracks. Any policy, regulation or subsequent code of practice must reflect that. There is no political will or public campaign to close greyhound racing down in Wales and it is also not a recommendation of this group. However regulation is desperately needed to ensure the welfare of the greyhounds racing in Wales.

Of course if welfare standards were higher in England as a result of any regulation they introduce and nothing were developed in Wales, we might expect a number of tracks

<sup>4</sup> Contact the Dogs Trust (UK Forum secretariat) on 0207 837 0006

<sup>5</sup> Available at [www.apgawales.org.uk](http://www.apgawales.org.uk) and [www.apgaw.org](http://www.apgaw.org)



## A Better Bet for Greyhounds



moving to Wales. There are currently approximately 9 independent tracks in England (there are also two tracks in Scotland, but like Wales, these come under the jurisdiction of the devolved Government). It is key that neither England nor Wales through design, or negligence, allow for the exportation or importation of cruelty following the introduction of Regulations and/or Codes.

Another key reason for regulation in Wales is that as NGRC has no presence in Wales currently, there would be no industry standard and no umbrella body requiring the Welsh tracks to comply. On the other hand and in any case, this Forum is not prepared to endorse the NGRC as a regulating body for racing in Wales. On closer examination NGRC rules governing welfare cannot be considered nearly sufficient nor are they rigorously enforced.

The reason for this is that welfare rules within NGRC racing are not given a high enough status, instead they are incorporated within other rules, which are much more to do with racing and fairness – the prime reason the NGRC was created. NGRC stipendiary stewards are charged with enforcing all the rules of racing and welfare, which has historically meant that racing has taken precedent.

NGRC Rule 18<sup>6</sup> (see below) is a prime example of a rule that is often ignored and certainly not widely enforced.

There have been some examples of this rule being enforced recently, however there are only a few examples of sanctions actually being imposed. For example, the Forum for Wales is interested to know the outcome of the inquiries following the Co Durham case. The Forum believes that independent regulation of greyhound racing is the best option to assure that proper welfare standards are established imposed and maintained.

Photo: Chris Montana



<sup>6</sup> [http://www.ngrc.org.uk/rule\\_book.asp?rule=34](http://www.ngrc.org.uk/rule_book.asp?rule=34)

### Rule 18 Responsibility of Owner

- (i) The NGRC Stewards shall hold the last registered Owner to be responsible for the welfare of a Greyhound and also for making acceptable arrangements for his/her retired greyhound as follows:
  - a) the Greyhound be retained as a pet, or
  - b) the Greyhound be boarded at a Licensed Kennel, or
  - c) the Greyhound be boarded at a Kennel licensed by the local authority, or
  - d) the Greyhound be found a home through the Retired Greyhound Trust, or
  - e) the Greyhound be sold or found a home, responsibly, or if it is necessary for the Greyhound to be euthanased either on humane grounds or because none of the above options are available, the Owner ensuring, subject to rule 58, that such euthanasia is carried out by a registered veterinary surgeon.
- (ii) A registered owner shall inform the NGRC if there is any change in ownership of a registered Greyhound and whether or not it is intended to enter in any Trial or Race again (see Rule 20). A registered Owner shall also report, or arrange for a licensed Trainer to report on his/her behalf, the retirement of a Greyhound which it is not intended to enter it (sic) in any Trial or Race again, or any subsequent 'Comeback' from a previously-reported retirement, to the Racing Manager of any NGRC Licensed Racecourse and shall be given and retain a receipt in the form of a copy of a Greyhound Detail Report prepared under Rules 195(i) and 194(vii).
- (iii) Failure to give notification under Rule 18(i) within 28 Days of the Change of Ownership shall result in a penalty, being levied and may result in the NGRC Stewards prohibiting an Owner from registering Greyhounds unless the Owner is able to satisfy the Stewards that any future retirement of a Greyhound in his/her charge will be strictly in accordance with Rule 18.

## Submission to the Welsh Assembly Government

### NGRC in Wales?

There are no NGRC tracks currently in Wales; however an existing independent track could convert or a new one could be built. Both situations are currently unlikely at this particular moment in time. Certainly the independent tracks currently operating in Wales would have to invest large sums of money to meet the entry standards required by NGRC. Both tracks are currently on leased land which may be determined as undesirable to the NGRC.

Thus the Forum feels strongly that it would be inappropriate if not impossible to appoint the NGRC as an enforcer in Wales at this stage. Without an NGRC presence in Wales it is crucial that the Welsh Assembly Government establish clear regulations for racing to protect these dogs in Wales and this Forum is happy to take a supportive role.



### Further considerations

The Greyhound Forum for Wales recognises there are a number of issues that are not addressed within this document, however they remain important and the Forum would be happy to participate in finding solutions. These issues are:

#### a) Register of Breeders

There is a great deal of concern about the number of puppies produced each year in the UK and Ireland and the lack of traceability for these animals. A register of breeders would go some way to addressing the problem. Although the Forum have not discussed a policy in this area as yet, there is a suggestion that those intending to trial/race a puppy must ensure it is registered on a puppy register as soon as possible after birth. In addition identification (microchip) must be completed by 3 months of age.

#### b) Cross border issues

The Greyhound Forum for Wales is keen that any Regulations/Code of Practice do not allow for the import or export of cruelty. However different rules in England and Wales do not necessarily have to create an imbalance but can instead complement each other. We are concerned that owner/trainers living in Wales but racing on NGRC and/or independent tracks in England be subject to the same rules as all other owner/trainers in Wales. However we would also not expect owner/trainers residing in England to be subject to lower standards should they wish to race in Wales.





## Chapter 2

### Proposals for measures to be included within Regulations & a Code of Practice

The following chapter is the final version of a document that Forum members have worked on for many months with a view to advising the Welsh Assembly Government on the issues surrounding the welfare of racing greyhounds in Wales. A decision was made not to separate recommendations into Regulation and Code, but to present the information in a format that is only concerned with the needs of the Greyhound.

We have attempted, where possible, to adopt models of legislation that already exists for our policy areas. The Forum has debated the need for regulation and has agreed that this is possible, given due consideration, without causing an excess of red tape, if a system similar to what we have proposed is adopted.

### Acknowledgements

These regulations draw extensively on two documents:

- The 'Guide to Best Practice' accompanying the 'Charter for the Racing Greyhound' produced by the UK Greyhound Forum.
- NGRC Rules of Racing.

In the case of the NGRC Rules of Racing, these regulations have sought to incorporate, and in some cases, adapt, the rules that are relevant to welfare.

These regulations have also incorporated elements of the 'Guide to Best Practice' where these enhanced welfare or provided supplementary material to the NGRC rules.

Finally, there is also some new material designed specifically to respond to the Welsh context and to further enhance welfare.

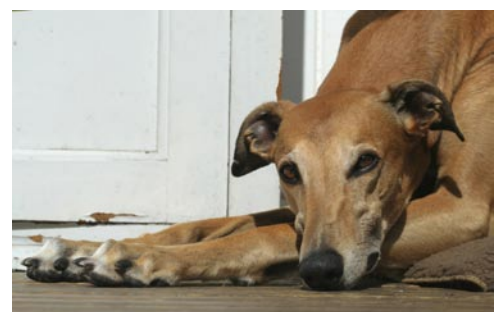
In this way it is hoped that these regulations offer a useful starting point towards the achievement of proper regulation of greyhound racing in Wales.

### Policy Context

A distinctive element in the regulations is that they take a partnership approach to service delivery. There will be two regulatory roles. The licensing role will be fulfilled by a statutory body (a local authority) and a complementary monitoring role will be fulfilled through the Greyhound Forum for Wales that brings together the voluntary sector (welfare organisations), and industry representatives (the Welsh Tracks). The relationship between the two bodies will obviously need to be formalised. However, the principle, of creating synergy to deliver improved services through partnerships between different stakeholders is in line with an important and developing strand of WAG policy. This may be found for example in public service policy (see for example Making the Connections – delivering better services for Wales, WAG 2004) and in community development policy (as for example in the 'three thirds principle' used by the Communities First Programme).



Photo: Greyhound Rescue Wales



### 1. Framework

#### 1.1 Licensing authorities

The Local Authority in whose area the activity takes place to be the licensing authority.

The Local Authority has the power to issue, refuse to issue, suspend or revoke all licences mentioned in this document.

The personnel appointed by the licensing authority to implement these regulations must be free of any vested interest (i.e. they must not be a member of a greyhound welfare organisation nor be engaged in any aspect of greyhound racing).

In determining whether to issue, refuse to issue, suspend or revoke the above licenses and passport the relevant authorities will be bound by the explicit provisions of these regulations.

#### 1.2 Licences

##### a) Track Licence

All Greyhound Stadiums in Wales must have an up to date Track Licence issued by the licensing authority. That licence will be awarded following an initial inspection. Additional risk-based inspections, both planned and spot checks, may be carried out by the licensing authority as they see fit.

The licensing authority will only renew the Track Licence if it is satisfied that the Track has met all the conditions.

There will be a fee for the licence set by the licensing authority (our suggestion is £100 per year – the fee to go towards costs incurred by the licensing authority).

##### b) Kennel Licence

Any premises where five or more racing greyhounds are kept must have a current kennel licence and take into account the accompanying 'Guidelines for Good Practice (Annex B)'. Retired, i.e. pet greyhounds will not be included in this figure.

This licence will be awarded following a successful initial inspection. Additional ad hoc inspections may be carried out by the licensing authority as they see fit.

The licensing authority will only renew the Kennel Licence if it is satisfied that the owner has met all the conditions.

There will be a fee for the licence set by the licensing authority (suggest £20 for capacity of 5 dogs then £5 per extra dog capacity per year the fee to go towards costs incurred by the licensing authority).

##### c) Owner/Trainer Registration

The term owner and/or trainer is used to denote the legal owner of the greyhound who is responsible for the welfare of the dog under these regulations.

All Owners and/or Trainers of greyhounds racing at Welsh Tracks Wales must have an Owner/Trainer's License.

The licence must be renewed every five years.

All greyhounds owned and/or raced must be listed on the licence.

The licence must be updated every time the ownership of a greyhound changes and in the event of a greyhound's physical appearance changing (e.g. amputation of a toe).

There will be a fee for issuing or making changes to the Owner/Trainer's licence details (suggest £5 – the fee to go towards costs of maintaining the database)

##### d) Transport regulations and good practice guidelines

Anyone transporting racing greyhounds to or from races, trials or sales in Wales must abide by the regulations in section 5 of this document and take into account the accompanying guidelines for good practice (Annex C).

It is the responsibility of the owner/trainer of a greyhound to ensure that drivers or other people in charge of a greyhound in transit or in a stationary vehicle adhere to the regulations and guidelines.

#### 1.3. Conditions

The conditions which must be met in order for any of the above to be issued are set out in these regulations.



### 1.4 Inspection and monitoring

#### a) Authorised Inspectors

The appropriate Minister to establish a list of persons authorised to undertake inspections under the regulation 'inspectors'. (This is akin to the model for Zoo Inspectors). No other person to be authorised to inspect. Inspectors to prove their competence either as appropriately experienced veterinary surgeons, experienced owners, trainers, representatives or welfare organisations dealing routinely with racing greyhounds. The Wales Greyhound forum to be consulted prior to the approval of any persons nominated for the role.

#### b) Duties of inspectors

The inspectors will monitor the operation of the Regulation / Code of practice in Wales through:

Inspecting each greyhound track once every year or more frequently if there are welfare concerns.

Inspecting all greyhound kennels in Wales licensed under these regulations once every year, or more frequently if there are welfare concerns.

Inspectors may inspect vehicles used for the transport of greyhounds when possible (for example while carrying out as kennel inspection if vehicles are parked at the same premises), as deemed necessary (for example if there are welfare concerns). Inspectors may make inspections as necessary to verify that the physical location of greyhounds is in accordance with the information held on the database and that their well-being is in accordance with welfare standards.

### 1.5 Welfare monitoring

#### a) Nominated Track Welfare Representative

The Greyhound Forum for Wales will approve Welfare Representatives (nominated by each track) and oversee their role.

#### b) Role of Nominated Track Welfare Representative

Track Welfare representatives nominated by each track will act as a first point of contact for welfare issues at the track.

In addition, all Track Welfare Representatives will be responsible for monitoring the database of owner/trainers and greyhounds in order to ascertain the physical whereabouts of greyhounds and to ensure that regulations are being followed.

The licensing authority, track managers, and owner/trainers will co-operate with Welfare Representatives and allow them access to all relevant databases and other data.

### 1.6 Greyhound Forum for Wales

#### a) Structure

Should future regulations/Code of Practice enshrine the Greyhound Forum for Wales' role, membership may need to be addressed and underwritten by Government. We would suggest further members from within Local Authorities and/or enforcement.

Each track will be entitled to appoint a representative to the Forum

Each greyhound-interested animal welfare group (Dogs Trust, Greyhound Rescue Wales & RSPCA) in Wales, will be entitled to appoint a representative to the Forum.

The Forum will have an independent Chair. This is currently the Chair of APGAW (All Party Group for Animal Welfare, in the National Assembly for Wales).

The Forum will meet a minimum of twice a year.

RSPCA currently provide the secretariat for APGAW Wales and the Greyhound Forum for Wales and may consider continuing this service.

#### b) Complementary responsibilities

The Forum will retain complementary database responsibilities for monitoring the ID & trace-ability schemes

Each year the Forum will nominate a minimum of 2 people (50% must be from the welfare organisations) to take responsibility for monitoring the database. These are additional and separate personnel from the tracks welfare reps. In this case their only responsibility is to monitor the database centrally. These monitoring reps will report to the Forum as demanded by the Forum. The Forum may make recommendations on the basis of such reports; to the Licensing Authority, or to Inspectors to assist and guide the Inspectors in fulfilling their duties for example under 1.4b above.

It may be appropriate for the Minister to confirm appointments to the Forum and the monitoring reps.

### 1.7 Penalties

The Local Authority will impose penalties upon greyhound owners, or trainers or track managers if it is satisfied that any regulations relating to the track licence or the kennel licence, or the transport regulations have been breached.

The Greyhound Forum for Wales may notify the licensing authority if, as a result of its monitoring activities, it believes that the regulations or code of conduct have been breached in particular with regard to the maintaining of accurate records of ownership and transfer of ownership of greyhounds.

The Greyhound Forum for Wales will be consulted by the Local Authority, to give evidence before the Local Authority imposes penalties upon greyhound owners, or trainers or track managers if the Local Authority is satisfied that any regulations relating to the owner/trainers licence or the transfer of ownership requirements have been breached.

Such penalties will include:

- Issuing a written warning
- Financial penalty (to be determined)
- Suspension of a licence for a period of time
- Permanently revoking a licence
- Banning a person from attending a greyhound track.

If an owner/trainer breaches any of the regulations below the Local Authority will be bound to temporarily suspend or permanently revoke the Owner/Trainers licence, depending on the circumstances in each case. In the event of repeated breaches of any of these regulations the Local Authority will be bound to permanently revoke the owner/trainers licence:

4.1 (Owner/Trainer must have up to date licence)

4.2 (Owner/Trainer must comply with veterinary advice)

4.3 (Owner/Trainer must co-operate with inspectors)

4.4 (Greyhounds must be micro-chipped and owner/trainer must transfer registration)

4.5 (Owner/Trainer must record transfer of ownership if greyhound sold or re-homed)

4.6 (Owner/Trainer responsible for welfare of greyhound and for making acceptable arrangements on retirement).

The Local authority will also be bound to permanently revoke a licence if the holder is found to have caused unnecessary suffering to a greyhound or to have failed in their duty of care to a greyhound.

### 1.8 Appeals

The Local Authority may at any time suspend, revoke or refuse to renew a licence; no such suspension or refusal to be unreasonably withheld. Any person aggrieved by such action may appeal within 30 days to a Magistrates Court and the action to be suspended until the appeal has been determined.



## 2. Track Licence

The Forum formally recommends a nominal charge of £100 per annum for the track licence payable to the licensing body – the Local Authority.

A track licence to hold greyhound races in Wales will be granted if the following conditions are met:

### 2.1 General condition of the track

The track will be well maintained so that nothing such as sharp edges, damaged or rough surfaces or loose fittings shall present any risk of injury to the greyhounds.

### 2.2 Measurements

The minimum circumference of the track, measured one metre from the inside fence, should be no less than 400 metres. Measurements are only acceptable when made by a qualified surveyor. The track width should be no less than 5.5 metres on the straights or 7.5 metres round the bends. The bends should be slightly banked from the inside to the outside – recommended rake 45cm. The curve of the bends should be as gradual as the width of the area between the two straights allows and must be able to accommodate the galloping action of a greyhound. An ideal radius for the bends is approximately 36 metres.

### 2.3 Gradient

The track shall be level with no significant gradient. A significant gradient is one that increases the risk of injury to racing greyhounds.

### 2.4 Surfaces

An appropriate surface such as sand must be used as a track surface on bends. Grass or sand may be used on straights. The sand should be laid to a minimum recommended depth of 175mm and, when bedded down, should provide a compact and safe surface giving good purchase. Good watering facilities and good drainage are essential. Sand type is most important. It must be free of all foreign matter – stones, flints, gravel etc and able to absorb the right amount of water. When sand is used as a surface this will be mechanically or manually smoothed after every three races.

### 2.5 Starting traps

Starting traps, both level and handicap, must be to a design and standard similar to NGRC standards and with provision for automatic starting. Where the traps are permanently fixed, there must be ample rear access so that it is easy to place the greyhounds in their compartments.

### 2.6 Muzzles

All dogs will wear suitable muzzles when racing, or trialling when there is more than one dog racing, when kennelled or in transport with another dog.

### 2.7 Veterinary presence at tracks

The Greyhound Forum for Wales remains unanimous in their view that veterinary presence at tracks is a positive step forward for both welfare and practical reasons. However both track representatives reserve the opinion that mandatory veterinary presence is prohibitively costly and will jeopardise business long term. Whilst the welfare reps of the Forum remain convinced that legislation is essential to ensure a veterinary presence at all race meetings, the tracks would ask that a trial period, or phase-in time period be considered if they can demonstrate that there is a suitable existing contract with an on-call vet within reasonable travelling distance to the track.

A qualified veterinary surgeon must be present at all greyhound races and at trials whenever there is more than one greyhound running on the track at the same time.

An 'on call arrangement' is not acceptable.

Any costs associated with assuring a veterinary presence will be met by the track.

### 2.8 The role of the veterinary surgeon

The veterinary surgeon will attend race meetings to attend to any dogs suffering injury or that he/she deems to be in need of veterinary attention.

The final decision on whether an individual dog is fit to race will reside with the veterinary surgeon.

The veterinary surgeon will keep a record of all injuries to greyhounds at the track. This will include details of the nature of the injury, where it occurred on the track, the time it occurred and any circumstances which in his/her opinion may have contributed to the injury. The record will contain details of the greyhound and its owner/trainer.

The veterinary surgeon will keep a record of any other treatment he/she administers to greyhounds at the track, the reason for the treatment and the details of the greyhound and the owner/trainer.

The veterinary surgeon will be empowered to stop the race meeting at any time if in his professional opinion continuing with the meeting would lead to an unacceptably high risk of injury for the dogs.

He/she will be empowered to inspect owner/trainers licences.

He/she will be empowered to inspect any greyhound attending the meeting as he/she sees fit (including those kept in owner/trainer's vehicles at or near the track before or after racing), and to recommend appropriate treatment and/or to stop the greyhound from racing.

If, in the opinion of any veterinary surgeon, the destruction of, or an urgent operation on, a greyhound in the charge of a licensed owner/trainer is necessary, the veterinary surgeon shall be entitled to proceed with such destruction or operation without the permission of the owner.

The cost of any treatment administered to greyhounds by the veterinary surgeon will be met by the owner/trainer.

The track owner will co-operate with the veterinary surgeon to enable him/her to fulfil his/her role.

If any person refuses to allow the veterinary surgeon to treat a greyhound or in any way obstructs him/her in carrying out his/her role the veterinary surgeon will report this immediately to the track owner or manager and as soon as possible to the licensing authority.

### 2.9 Veterinary facilities

There must be an adequate, lockable first aid room, if possible out of sight and sound of the public, for the track vet to inspect greyhounds or to attend injured greyhounds. Alternatively, a mobile surgery may be used so long as it meets the specifications in this section.

The facility should contain an examination table large enough to take a recumbent greyhound and with a non slip surface that is easily cleanable. Good lighting is essential above this table. A sink and drainer must be provided with hot and cold running water. Heating must be provided in the room.

Drugs must not be kept on track premises when the veterinary surgeon is not in attendance. The veterinary surgeon is responsible for the safe keeping of all drugs and medications.

The Track owner will be responsible for keeping a permanent room clean and tidy and maintaining all fittings, furniture and equipment in suitable working order.

The veterinary surgeon will be responsible for keeping a mobile facility clean and tidy and maintaining all fittings, furniture and equipment in suitable working order, unless the mobile facility is owned by the track in which case the Track owner will be responsible.

The Veterinary surgeon will be responsible for providing all instruments, medication, dressings etc necessary for the treatment of greyhounds. The track will be responsible for paying for these.

The veterinary surgeon will be responsible for the disposal of all sharps and surgical waste.

#### Further guidelines:

It is advisable for the track to provide in the treatment room:

- A small fridge in which to store certain medications and dressings (during racing only)
- A telephone or radio link with race officials
- A speaker connected to the public address system.
- A monitor linked to the track's closed circuit system (where there is one) so that the Veterinary Surgeon is able to view replays to help assess the cause of and treatment for an injury.

### 2.10 Access for inspection

Each track shall allow free access to racecourse premises to inspectors appointed by the licensing authority for Wales, and co-operate fully with them to monitor and help assure the implementation of these regulations



### 3. Kennel Licence

Any premises where five or more racing greyhounds are kept must have a current kennel licence that must be renewed annually. For the purposes of these regulations a racing greyhound is a greyhound that is entered in the database as a racing greyhound.

The licensing authority will only grant or renew the kennel licence if it is satisfied that the kennels provide suitable accommodation for the racing greyhounds kept there.

The Greyhound Forum for Wales welcomes situations where owners of racing greyhounds keep their dogs in their own home and such accommodation will in most cases be deemed suitable.

The licensing authority may require that certain works are carried out over a reasonable period of time to bring existing premises up to the desired standard. In such cases a license may be granted subject to these works being completed by the agreed date. This should be termed a Conditional Licence and only remain applicable if the time scale for improvements is met.

In determining whether accommodation is suitable the licensing authority will take into account the 'Best practice guidelines for kennels', set out in the 'Charter for the Racing Greyhound' produced by the UK Greyhound Forum and appended to this document as Annex B, with the following provisos:

#### Provisos

- Paragraph 21 (changes underlined) to read: "During daylight hours natural light must be provided to exercise and sleeping areas so that all parts are clearly visible".
- Paragraph 25 (changes underlined) to read: "No animals other than greyhounds are to be boarded within the facilities without written approval of the licensing authority".
- In addition, some parts of the code of practice may be felt to be appropriate only to larger kennels such as those housing say 10 dogs or more, while others may require interpretation or adaptation. Examples of such areas are:
  - Paragraphs 43-46 (kitchen facilities): In the case of smaller kennels of 9 or less dogs where these kennels are located within the garden or yard of the owner/trainer's homes, storage and refrigeration facilities should still be available but it may be felt acceptable that these could be within the owner/trainer's home. In the case of larger kennels of 10 or more dogs and where smaller kennels are more than 30 metres from the owner/trainer's home however, it might be felt necessary that suitable storage, cooking and refrigeration facilities should be provided at the kennels.
  - Paragraph 49 (marking of kennels): the numbering or marking of kennels may be felt not to be necessary in the case of kennels housing fewer than 10 dogs.

Further consideration is needed as to how the kennelling guidelines should be applied to kennels of different sizes.

### 4. Owner/Trainer Licence

#### 4.1 Conditions of licence

Every owner/trainer of a greyhound racing in Wales must have a current owner/trainers licence.

At the start of the regulatory system applications for owner/trainers licences will be made retrospectively i.e. by owner/trainers who already own racing greyhounds. Once the regulatory system is established it will be advisable for new owner/trainers to apply for a licence in advance of owning a racing greyhound.

The owner/trainer's licence must be produced each time the owner/trainer races a greyhound at a Welsh Track.

The owner/trainer of a greyhound shall provide his true name and address, together with fixed telephone line\*, mobile telephone line\* and email\* details (\*where these exist). The name and address of the owner/trainer must be verified by a passport, photo driving licence, or two recent utility bills/bank statements.

The owner/trainer must provide two recent passport size photographs one of which will be fixed to the licence and one of which will be sent to the Greyhound Forum for Wales.

The licence will be updated each time an owner/trainer acquires a new greyhound (from their first appearance at a track for trialling or racing) or disposes of an existing greyhound, or if a greyhound's appearance changes. The licence will be renewed every 5 years unless it is suspended or revoked by the licensing authority or unless the owner/trainer relinquishes it.

The owner/trainer of a greyhound is responsible for keeping this information up to date by informing a Welsh Track Manager or the Licensing Authority for Wales of any changes.

### 4.2 Compliance with veterinary advice

The owner or trainer will comply with any advice given by a qualified veterinary surgeon present at a race meeting or carrying out an inspection at their premises.

### 4.3 Co-operation with inspectors

The owner or trainer will co-operate fully with welfare officers and inspectors and provide them with reasonable access to their property, vehicles or records to enable them to fulfil their duties under these regulations.

The owner/trainer will not withhold any information requested by a welfare officer or inspector.

### 4.4 Details of Greyhounds owned/trained

Every greyhound racing, or trialling owned or trained must be listed, including microchip number on the owner/trainer licence. The licence must be produced by the owner/trainer every time the greyhound races.

The owner/trainer of the greyhound is responsible for informing the licensing authority for Wales (either directly or through a Track Manager) by completing and returning a change of ownership/adoption form, if they sell or dispose of a greyhound.

### 4.5 Transfer of ownership

If an owner/trainer sells or disposes of a greyhound to another person resident in or outside of Wales with the intention that the greyhound will continue to race, the owner/trainer must complete a transfer of ownership form. When a greyhound retires from racing an owner/trainer must complete a 'final fate' form detailing which of the acceptable arrangements have been made for the greyhound. The owner/trainer will be responsible for ensuring that all details, including the name, address and contact details of the details of the new owner are accurate.

### 4.6 Responsibility of owner/trainer

The owner/trainer of a greyhound is responsible for the welfare of a greyhound and also for making acceptable arrangements for his retired greyhound as follows.

- (i) The greyhound be retained as a pet. In this case the owner/trainer will complete an adoption form approved or issued by the Greyhound Forum for Wales and return this to the Greyhound Forum for Wales.
- (ii) The greyhound be handed to a reputable welfare organisation approved by the Greyhound Forum for Wales. In this case the owner/trainer will complete a transfer of ownership form approved or issued by the Wales Greyhound forum and return this to the Greyhound Forum for Wales.
- (iii) The greyhound shall be found a home as a pet by the owner/trainer. In this case the owner/trainer will need to show that they have followed such good practice guidelines as may be issued by the Greyhound Forum for Wales. They will also ensure that the new owner completes an adoption form approved or issued by the Greyhound Forum for Wales and they will be responsible for returning the form to the Forum and ensuring that the details provided by the new owner are accurate.
- (iv) The greyhound shall be euthanased by a qualified veterinary surgeon. In this case the owner/trainer will need to show that they have attempted to follow a, b or c above and give reasons why it has not been possible to do so by completing the appropriate form issued by the Greyhound Forum for Wales. This form must also be verified and signed by the veterinary surgeon carrying out the euthanasia. The completed form signed by the owner/trainer and the veterinary surgeon must be returned to the Greyhound Forum for Wales by the owner/trainer.

### 5. Transport

#### 5.1 Greyhounds kept in vehicles at race events

These regulations do not require tracks to provide kennels for greyhounds attending race meetings. Most greyhounds will therefore be kept in owner/trainers vehicles for some time at race events. It is therefore particularly important that these regulations are adhered to when greyhounds are in stationary vehicles as well as during transport.

#### 5.2 Cooling down after racing

Greyhounds will not be loaded into vehicles until suitably cooled down and will be offered water before being loaded.

#### 5.3 Reasonable Temperature

Whilst the Greyhound is being contained/transported, the vehicle temperature should be maintained between 10°C and 22°C.

#### 5.4 Adequate space in a vehicle

A cage to contain a greyhound should be of adequate size to protect the greyhound's welfare.

**The welfare groups on the Forum also believe that the cage should allow the greyhound to stand fully and lie comfortably, and be constructed so as not to cause any harm to the dog.**

#### 5.5 Restraint during transport

Greyhounds must be restrained during transport. This may either be by a properly secured harness if travelling in the back of a car, by using a secure dog guard in an estate car, or in cages secured to the vehicle, or in a purpose built trailer or vehicle.

#### 5.6 Checking on stationary vehicles

It is the owner/trainer's responsibility to ensure that checks are made sufficiently frequently on greyhounds that are kept in vehicles at race meetings to ensure that all the above regulations are met.

#### 5.7 Checking on dogs in transit

It is the owner/trainer's responsibility to ensure that checks are made sufficiently frequently on greyhounds that are in transit but not in the same space as the driver of the vehicle.





## ANNEX A

### Examples of proposed Owner/Trainers Licence and associated traceability forms

Note: The Greyhound Forum for Wales is aware of research being carried out by the Society of Greyhound Veterinarians into the merits of different methods to assure the traceability of greyhounds. The findings of this research may suggest changes to the system and the forms as set out in this annex.

Owner/Trainer Licence no .....

**Owner/Trainer Licence Registration  
Welsh Greyhound Tracks**

**ALL DETAILS MUST BE COMPLETED IN FULL**

1st name ..... Surname.....

Home address .....

..... Post Code.....

Address where dogs are kennelled/kept (if different from above) .....

..... Post Code.....

Home Tel No (Inc code)..... Mobile or 2nd No.....

**Declaration by owner:** I confirm that I am the person named above and all details about me are correct. I accept full responsibility of the greyhounds in my care in accordance with the Regulations. I confirm that I have been given a copy of the Regulations and I understand and agree to abide by all that is contained within it. I agree to update these records with a Welsh track manager if any changes occur.

Signed ..... Date.....

**Declaration by registrar:** I confirm that the 2 photographs provided give a true likeness to the person named above. I have been given the following items for identification (tick one):

Drivers licence (photo card and paper copy). Licence number .....

Valid UK passport. Passport number .....

2 utility bills showing above name and address.  
Please complete here what bills/company they are from .....

And reference numbers/account numbers associated with these bills .....

Signed – Registrar..... Name ..... Date.....

Greyhounds in the care of the above named owner trainer at date:

Racing name	Pet name	Sex	D.O.B./Age on registration	Microchip No	Earmarks	Description

Owner/Trainer Licence no.....

### Greyhound Change of Ownership Welsh Greyhound Tracks

ALL DETAILS MUST BE COMPLETED IN FULL

**THIS SECTION IS TO BE COMPLETED BY CURRENT OWNER**

Owner's 1st name..... Owner's Surname .....

Owner's Address.....

..... Post Code.....

Home Tel No (inc code)..... Mobile or 2nd No.....

Greyhound's Earmarks ..... Greyhound's Microchip Number .....

Racing Name..... Pet Name .....

Sex of Greyhound ..... D.O.B. or Approx age at registration.....

Colour..... Distinguishing features .....

.....

*(Note – in the final version of the form this part may be a description or a diagram – details to be decided in light of research into greyhound identification being carried out by the Society of Greyhound Veterinarians.)*

**Declaration by current owner:** I confirm that I am the current owner of the greyhound described above and all details are correct. I understand that full ownership and responsibility of the greyhound has now passed to the new owner.

Signed ..... Date.....

Signed – Registrar ..... Name ..... Date.....

**THIS SECTION IS TO BE COMPLETED BY NEW OWNER**

Owner's 1st name..... Owner's Surname .....

Owner's Address.....

..... Post Code.....

Home Tel No (inc code)..... Mobile or 2nd No.....

**Declaration by new owner:** I confirm that I am the new owner of the greyhound described above and all details are correct. I understand that full ownership and responsibility of the greyhound has now passed to me as from this day of declaration. I agree to update these records with a Welsh track manager or the licensing authority for Wales if any changes occur in accordance with the Regulations. I agree to complete 'change of ownership' record if/when the ownership greyhound described above changes. I have been given the Regulations and I understand and agree to abide by all that is contained within.

Signed ..... Date.....

Signed – Registrar ..... Name ..... Date.....



Owner/Trainer Licence no.....

**Final Fate  
Welsh Greyhound Tracks**

**ALL DETAILS MUST BE COMPLETED IN FULL**

Owner's 1st name..... Owner's Surname .....

Owner's Address.....

..... Post Code.....

Home Tel No (inc code)..... Mobile or 2nd No.....

Greyhound's Earmarks ..... Greyhound's Microchip Number .....

Racing Name..... Pet Name .....

Sex of Greyhound ..... D.O.B or Approx age at registration.....

Colour..... Distinguishing features .....

.....

*(Note in the final version of the form this may be a description or a diagram – details to be decided in the light of research into greyhound identification being carried out by the Society of Greyhound Veterinarians.)*

**Final Fate – please tick A, B, C, D or E, and complete the details in that section**

**A) Dog kept as a pet by owner (if rehomed to someone else then 'change of ownership form is required)**

I understand that the dog's welfare remains my full and total responsibility (as per the Regulations). I understand that I may be called upon at any time to present the dog and I am obliged to do so immediately. I agree to update the registrar if this situation changes and complete relevant paperwork in accordance with the Regulations.

**B) Dog rehomed to a rescue organisation**

Name of rescue organisation .....

Name of rescue organisation rep dog was handed to.....

Date dog was handed over .....

RESCUE ORGANISATION OFFICIAL HANDOVER RECEIPT MUST BE ATTACHED TO VALIDATE THIS OPTION – MUST INCLUDE DETAILED DESCRIPTION OF DOG INC. MICROCHIP NUMBER/EARMARKS.

**C) Dog re-homed to a third party as a pet by owner**

I have followed Greyhound Forum for Wales guidelines of good practice in re-homing a greyhound and I am satisfied that the owner will offer a good home as a pet to the greyhound. I attach a completed adoption form approved by the Greyhound Forum for Wales and I certify that the details on this form are correct to the best of my knowledge. (cont)

**D) Euthanasia by a vet**

Declaration by owner that at least 5 rescue organisations were contacted but unable to take the dog at any time.

- 1) Name of organisation ..... Person contacted ..... Date call made .....
- 2) Name of organisation ..... Person contacted ..... Date call made .....
- 3) Name of organisation ..... Person contacted ..... Date call made .....
- 4) Name of organisation ..... Person contacted ..... Date call made .....
- 5) Name of organisation ..... Person contacted ..... Date call made .....

VET STAMPED RECEIPT OF EUTHANASIA PROCEDURE MUST BE ATTACHED TO VALIDATE THIS OPTION – MUST INCLUDE DETAILED DESCRIPTION OF DOG INCLUDING MICROCHIP NUMBER/EARMARKS.

**E) Sudden Death**

VET STAMPED RECEIPT OF POST DEATH EXAMINATION MUST BE ATTACHED TO VALIDATE THIS OPTION – MUST INCLUDE DETAILED DESCRIPTION OF DOG INCLUDING MICROCHIP NUMBER/EARMARKS.

**Declaration by owner**

I confirm that I am the owner of the greyhound and fate described above and all details are correct.

Signed ..... Date.....

**Registrar** – all receipts attached are correct according to the rule book.

Signed – Registrar ..... Name ..... Date.....

## **ANNEX B**

### **Guidelines for Good Practice – Kennels**

*Please note that we have taken these guidelines from the **UK Greyhound Forum** (and amended them slightly) – as such they represent a comprehensive, but perhaps not complete, perspective on kennelling.*

#### **Construction**

##### **General**

1. The establishment must, at all times, be laid out and operated in accordance with an approved plan, and plans must be submitted to an approved by the licensing officer.
2. Where wood has been used in existing construction it must be smooth and treated to render it impervious. Wood should not be used in exposed construction of walls, floors, partitions, door frames or doors in the dog kennelling area. There must be no projections liable to cause injury.
3. Fencing material must be secure and safe.
4. Sleeping areas of kennels must be so insulated as to prevent extremes of temperature.
5. The construction must be such that the security of the dog is ensured.
6. All exterior wood must be properly treated against wood rot, eg Tanalised.
7. All internal surfaces used in the construction of walls, floors, partitions, doors and door frames to be durable, smooth and impervious. There must be no projections or rough edges liable to cause injury.

*Some existing premises may not comply with these requirements. In such circumstances improvements to do so should be a condition of licensing with clear timescales for implementation.*

*The point of these standards is to provide good welfare conditions for dogs. To do so the kennels must be properly maintained and in a clean state and the conditions are to ensure this is so.*

*Wood is generally to be avoided because it can be difficult to clean adequately and has a high maintenance burden. Worn or splintered wood can also present a hazard to dogs as well as being difficult to clean.*

*Where galvanised wire mesh is used for fencing the wire diameter must not be less than 2.0mm (14SWG) excluding any covering and the mesh size must not exceed 50mm (2”).*

*The conditions should be backed up with a hygienic and safe scheme of work to protect both the welfare of the dogs and to provide a safe working environment for staff.*

##### **Walls and Partitions**

8. Walls with which dogs may come into contact must be smooth impervious materials, capable of being easily cleansed. Where concrete or other building blocks or bricks are used in such walls, they must be sealed so as to be smooth and impervious, and resealed as necessary.
9. Junctions between vertical and horizontal sections should be covered. If impractical in existing premises, all joints must be sealed.
10. Partitions between dogs should allow some social contact while preventing any injury from possible aggression and this may best be achieved using a wire mesh construction.

*Suitable materials for the construction of walls would be concrete block, brick, moulded plastic, glass reinforced plastic and pre-formed plastic surfaced board. Where block or brick is used the surface must be made impervious using a proprietary water proofing agent for sealing the wall against damp penetration. Under some circumstances this can be achieved by rendering prior to sealing.*

##### **Floors**

11. Floors of all buildings, individual exercise areas and kennels must be of smooth, impervious materials, capable of being easily cleansed and in new kennels must incorporate a damp proof membrane.

*Floors of kennels and related exercise areas should be constructed in impervious material and be capable of cleansing while providing sufficient grip for the dog to walk and run without sustaining injury.*



## Submission to the Welsh Assembly Government

12. All floors of kennels and individual exercise areas must be constructed and maintained in such a condition as to prevent ponding of liquids.
13. In new construction floors must be laid to a minimum fall of 1 in 80 leading to a shallow drainage channel or effectively covered deep drainage channel.
14. Communal exercise areas must be suitably drained but need not comply with conditions 11 and 12.

### Ceilings

15. Ceilings must be capable of being easily cleansed.

### Doors

16. Kennel doors must be strong enough to resist impact and scratching and must be fitted to be capable of being effectively secured.
17. Where metal bars and frames are used, they must be of suitable gauge (approximately 10-14 SWG) with spacing adequate to prevent dogs escaping or becoming entrapped. Where metal edging is used, this must not present a risk of injury to the dog.
18. Door openings must be constructed such that the passage of water/waste is not impeded, or allowed to gather due to inaccessibility.

### Windows

19. All windows, which pose a security risk, must be escape proof at all times.

### Drainage

20. The establishment must be connected to main drainage or an approved, localised sewage disposal system.

### Lighting

21. During daylight hours light must be provided to exercise and sleeping areas so that all parts are clearly visible. Where practicable this must be natural light.
22. Adequate supplementary lighting must be provided through the establishment.

### Ventilation

23. Ventilation must be provided to all interior areas without the creation of excessive, localised draughts in the bedding area.

### Maintenance

24. Maintenance and repair of the whole establishment must be carried out regularly.

### Dogs permitted

25. No animals other than greyhounds are to be boarded within the facilities.

*Drainage channels should be provided near to the kennel edge so that urine is not allowed to pass over walk areas in corridors and communal exercise areas. It is reasonable to drain a bedding area in the opposite direction to the exercise area if separate drainage channels are provided.*

*Where galvanised wire mesh is used for doors the wire diameter must not be less than 2.0 mm (14SWG) excluding any covering and the mesh size must not exceed 50mm (2").*

*When designing kennel doors regard should be paid to the health and safety of persons working in the kennel. It may be easier for staff to gain access and egress by having the door opening inwards.*

*Windows must either be constructed of reinforced (toughened) glass or polycarbonate or suitably protected by welded mesh to prevent breakage.*

*Natural and artificial lighting must be of sufficient standard to allow proper observation of dogs and cleaning of the establishment at all times.*

*Dogs should be maintained in a draught free area with temperature and humidity controlled. Careful siting of the dog's bed is an important consideration as is the design of the bed itself (such as raised sides and lifting above ground level).*

### Kennel Size, Layout and Exercise Facilities

26. For new kennels each kennel must be provided with a sleeping area of at least 1.9sq m (20sq ft.)
27. Suitable bedding equipment must be provided which allows the dog to be comfortable and which is capable of being easily and adequately cleaned and sanitised. Such equipment must be sited out of draughts. All bedding material must be maintained in a clean, parasite-free and dry condition.
28. For new kennels, each kennel must be provided with an exercise area of at least 3.34 sq m (36 sq ft) for dogs, which is separate from the bedding area and exclusive to that kennel, for free use by the dog at all times except at night.
29. Kennels must have minimum height of 1.8m (6ft) to facilitate adequate access by kennel staff for cleaning.
30. Exercise areas must not be used as bedding areas.

*In existing kennels it may be impossible to comply with the size standards. In such cases an agreed Action Plan should be put in place to ensure compliance over a few years.*

*It is a requirement of the Animal Welfare Act 2006 that an animal be allowed to display normal behaviour and as such dogs must have regular and appropriate exercise in addition to races and walks on the lead.*

*An Action Plan should be agreed as detailed in the notes on para 26. The exercise area should be roofed to a minimum of half the area, sufficient to give the dog protection against the weather. Some of this should be translucent material capable of filtering ultraviolet light and providing shade.*

### Management

#### Training

31. A written policy for training staff must be provided and must be demonstrated to have been carried out.

*Staff training is an essential part of the management of a kennel and must be applied to all staff, permanent and temporary. Subjects which are covered should include cleanliness and hygiene, feeding and food preparation, recognition and treatment of sick animals, animal welfare, Health & Safety and emergency procedures.*

#### Temperature in Kennels

32. Heating facilities must be available in the kennels and used according to the requirements of the individual dog.
33. There must be some part of the dog's sleeping area where the dog is able to enjoy a minimum temperature of at least 10°C (50°F) and a maximum of 22°C (79°F).

*Many kennels have been built without proper regard for the welfare of the dogs. The materials on the kennel exterior may not offer adequate thermal protection against temperature variations throughout the majority of the year. While it is accepted that ambient temperatures may exceed the suggested maximum, measures must be in place to provide adequate ventilation to compensate.*

*It is not adequate for temperatures to fall above or below the suggested range because of inadequate design and attention should be given to insulation and orientation of the building to assist in thermal regulation. Kennels which face south will inevitably suffer more from high temperatures than those facing north. Adequate insulation will assist both in increasing temperatures in winter (and thereby reducing heating bills) and controlling temperatures in hot weather.*

*Adequate heating must be provided to maintain a minimum temperature. Exposed cables and naked flames are to be avoided. Heat lamps may provide adequate heat in cold weather.*

#### Cleanliness

34. All kennels, corridors, common areas, kitchens etc must be kept clean and free from accumulations of dirt and dust and must be kept in such a manner as to be conducive to maintenance of disease control and dog comfort.
35. Each occupied kennel must be cleansed daily. All excreta and soiled material must be removed from all areas used by dogs at least daily and more often if necessary

*A cleaning regime should be instituted to include the removal of solids, washing, disinfection and drying. The physical collection of faeces (bucket and shovel) is usual followed by washing with water and detergent although a pressure hose or steam cleaner is more effective. Simple disinfection is no alternative for thorough cleaning.*

*Where any disinfectant is used COSHH data sheets should be available in case of accidental spillage or injury to staff.*

## Submission to the Welsh Assembly Government

36. All bedding areas must be kept clean and dry.
37. Facilities must be provided for the proper reception, storage and disposal of all waste. Particular care should be taken to segregate clinical waste arising from the treatment and handling of dogs with infectious disease. The final disposal route for all waste must be incineration.
38. Measures must be taken to minimise the risks from rodents, insects and other pests within the establishment.

*Arrangements must be made with the Waste Collection Authority or waste management contractor authorised for the purposes of the duty of care for removal of other wastes from the establishment under the Environment Protection Act 1990. Foul waste water must be discharged to the approved drainage system.*

### Food and Water Supplies

39. All dogs must be adequately supplied with suitable food. Wholesome water must be available at all times and changed daily.
40. Eating and drinking vessels must be capable of being easily cleansed and disinfected to prevent cross-contamination. They must be maintained in a clean condition.
41. Eating vessels must be cleansed after each meal.
42. Drinking vessels must be cleansed at least once a day.

*Dogs should be fed to a standard compatible with the maintenance of health in a physically fit dog. Inspectors will assess the nutritional status of the dogs and the type and quality of food in store and in the process of preparation.*

*Food should not be left for excessive periods within the kennel to avoid smells and flies. More food and water may be required for young dogs. No food should be left out overnight.*

### Kitchen facilities

43. Kitchen facilities, hygienically constructed and maintained, must be provided for the storage and preparation of food for dogs.
44. Where fresh and cooked meats are stored, refrigeration facilities must be provided, and potential food contamination must be avoided.
45. A sink with hot and cold water must be provided for the washing of food equipment and eating and drinking vessels. If staff are employed, a separate wash-hand basin with hot and cold water must be provided for use.
46. Containers must be provided for the storage of food and shall be so constructed and kept in such good order, repair and condition as to be proof against insects and other pests.

### Disease Control and Vaccination

47. All dogs should be vaccinated as puppies. Regular booster vaccination should be administered as advised by the veterinary surgeon. Advice should also be sought on other suitable preventative treatments.
48. A well stocked first-aid kit suitable for use on dogs must be available and accessible on site.

*Where there is evidence of parasite infestation suitable treatment must be administered on the advice of a veterinary surgeon.*

*The first aid kit must be well stocked at all times with contents as advised by the veterinary surgeon.*

*A veterinary practice must be appointed to provide health care for the dogs. The telephone number for emergency contact must be readily available to staff.*

### Records and Identification of Kennels

49. Each kennel must be clearly marked (e.g. numbered), and a system in place which ensures that relevant information about the dog in that kennel is readily available.

*Every dog's clinical records should be readily available for examination by staff and the veterinary surgeon. Clear marking of kennels and identification of the occupant is an essential part of this.*

### Supervision

50. A fit and proper person must always be present to exercise supervision and deal with emergencies whenever there are dogs at the premises.
51. Dogs must be visited at regular intervals as necessary for their health, safety and welfare.

*Suitable intervals for visiting means intervals of not less than four hours between 08.00 and 18.00. A later visit may be appropriate but this should be balanced against the disturbance caused to the dogs and neighbours.*

### Fire Precautions

52. Appropriate steps must be taken for the protection of the dogs in case of fire or other emergencies.
53. A proper emergency evacuation plan and fire warning procedure must be drawn up and posted on the premises. This must include instructions on where dogs are to be evacuated to in the event of a fire or other emergency.
54. Fire fighting equipment must be provided in accordance with advice given by the Fire Prevention Officer or other suitably qualified person.
55. All electrical installations and appliances must be maintained in a safe condition. There must be a residual current circuit breaker system on each block of kennels.
56. Heating appliances must not be sited in a location or manner where they may present a risk of fire, or risk to dogs.
57. Precautions must be taken to prevent any accumulation which may present a risk of fire.
58. There must be adequate means of raising an alarm in the event of a fire or other emergency.

*It is recommended that plans and details of the establishment are logged with the police and fire service. Fire protection advice should be sought from a suitably qualified person regarding appropriate fire extinguishers and their correct siting, fire drills and fire escapes, are implemented. A record of such events as extinguisher service and fire drills should be kept. The general principle of people first in the event of fire is good advice.*

*Where new buildings or rebuilding is being undertaken the fire prevention officer will give advice on fireproofing requirements.*

*Advice from a suitably qualified person should be in writing. Particular regard should be given to the storage of inflammable substances. Staff should have been trained to use fire extinguishers. It is advisable to install smoke detectors.*

*Dogs must not have access to open flame heating devices.*



## ANNEX C

### Guidelines for Good Practice – Transport

Please note that we have taken these guidelines from the **NGRC Rules of Racing Appendix 2 – Guidelines for Transportation of Greyhounds**<sup>7</sup> (and amended/updated them slightly) – as such they represent a comprehensive, but perhaps not complete, perspective on transportation.

#### Introduction

The transport of greyhounds is an intrinsic element of the greyhound racing industry; dogs rarely live and race at a single location. Furthermore the frequency of transport is likely to be greater than for most other dogs and takes place when the animal is likely to be subject to significant physiological stress resulting from racing or trialling. It is therefore important that transport conditions are optimal. In addition, Greyhounds are one of the few non-farmed species where there is significant national and international trade. This results in some long distance transport when it is also important that adequate conditions are provided for the dogs.

These guidelines are intended to assist persons transporting Greyhounds to provide those conditions. They are not prescriptive except in a small number of areas such as cage sizes.

#### Legislation

The main section of these guidelines is intended to provide information to people transporting healthy Greyhounds. In most instances in the racing industry it is likely that the law will regard such transport as 'commercial' and consequently subject to Council Regulation (EC) 1/2005 on the protection of animals during transport<sup>8</sup> and The Welfare of Animals (Transport) (Wales) Order 2007, otherwise known as WATO. The conditions suggested in these guidelines should help transporters comply with WATO but the full document can be found at:

[http://www.opsi.gov.uk/legislation/wales/wsi2007/wsi\\_20071047\\_mi.pdf](http://www.opsi.gov.uk/legislation/wales/wsi2007/wsi_20071047_mi.pdf)

Further guidance can be found at:

[http://new.wales.gov.uk/topics/environmentcountryside/ahw/animal\\_welfare/animalsintransport/?lang=en](http://new.wales.gov.uk/topics/environmentcountryside/ahw/animal_welfare/animalsintransport/?lang=en)

See endnote for further guidance for when it is necessary to transport sick or injured Greyhounds.

WATO requires that, where any journey is greater than 65km an Animal Transporter Authorisation must be granted and carried by the driver of the vehicle. The Regulation applies to all those involved with the transport of vertebrate animals in connection with an economic activity. For example, livestock and equine hauliers, farmers, animal breeders, transporters of performing animals and those working at markets assembly centres and slaughterhouses. It does not apply to individuals who ride for pleasure who transport their own horse or to individuals taking their own pets on holiday. It also doesn't apply to a farmer transporting a single animal.

Further information including guidance and the relevant forms can be found at:

[http://new.wales.gov.uk/topics/environmentcountryside/ahw/animal\\_welfare/animalsintransport/?lang=en](http://new.wales.gov.uk/topics/environmentcountryside/ahw/animal_welfare/animalsintransport/?lang=en)

Of course all other animal welfare legislation is also applicable. The Animal Welfare Act 2006<sup>9</sup> imposes a general 'duty of care' on all owners and keepers to provide good conditions for their dogs at all times.

#### General conditions

During any transport by road the driver must be conscious of the fact that he or she is transporting sentient animals and has a duty of care to ensure that the standard of driving and care is commensurate with their comfort (i.e. drive sensibly). Keepers of Greyhounds should ensure that drivers have been trained and shown themselves to be competent in the care of the dogs.

The expected journey time from trainer's kennels to the attached track for racing should be less than four hours.

Greyhounds should not be loaded for transport for at least thirty minutes after racing to allow them to cool.

#### Planning

Habituation is vital to reduce transport stress. This should be achieved before fourteen weeks of age if possible so that the greyhound is used to being transported. It will also help to introduce a sapling to the wider world at the same age and well before initial trials at about eleven months of age.

<sup>7</sup> [http://www.ngrc.org.uk/rule\\_book.asp?rule=223](http://www.ngrc.org.uk/rule_book.asp?rule=223)

<sup>8</sup> [http://eur-lex.europa.eu/LexUriServ/site/en/oj/2005/l\\_003/l\\_00320050105en00010044.pdf](http://eur-lex.europa.eu/LexUriServ/site/en/oj/2005/l_003/l_00320050105en00010044.pdf)

<sup>9</sup> [http://new.wales.gov.uk/topics/environmentcountryside/ahw/animal\\_welfare/animalwelfareact/?lang=en](http://new.wales.gov.uk/topics/environmentcountryside/ahw/animal_welfare/animalwelfareact/?lang=en)

## A Better Bet for Greyhounds



The conditions provided should partly be related to the length of the journey. All journeys should be properly planned and this should include planning in the event that the expected journey time is exceeded as well as locations of stops for watering, feeding or emptying. Such detail should be included in the ATC.

Other factors to be taken into account are the mode of travel e.g. car, sea or air and the opportunity to rest.

No segment of a journey should exceed twenty-four hours and there must be a twelve hour rest period before any subsequent journey. If any part of the journey includes a sea passage this must be included in the journey time.

Greyhounds must be restrained during transport. This may either be by a properly secured harness if travelling in the back of a car, by using a secure dog guard in an estate car or in cages secured to the vehicle. The dogs should be completely contained inside the vehicle and the driver should consider other potential hazards such as gaps between seats in cars and door handles.

Greyhounds may travel in pairs in a car providing the cages are large enough and both dogs are muzzled. Cages in purpose-built vehicles should be designed for one dog.

If it is necessary to move a litter of puppies before weaning they should travel together. If they travel with their dam this should be in a double cage.

It may be useful to have a checklist to ensure that nothing has been forgotten.

### Cages

Although the Greyhound Forum for Wales has agreed not to recommend a specific cage size, we do believe a cage to contain a greyhound should be of adequate size to protect its welfare. The individual members of the Greyhound Forum for Wales are likely to respond to a public consultation recommending their own beliefs with regards specific sizes.

**The welfare groups on the Forum also believe that the cage should allow the greyhound to stand fully and lie comfortably, and be constructed so as not to cause any harm to the dog.**

For travel by air, IATA rules on cage sizes must be followed. The current IATA Live Animals Regulations are obtainable from The Stationery Office, Tel: 020 7838 8400.

Cages should be constructed of impervious materials such as uPVC, rustproof (stainless) steel mesh or painted timber. They must have suitable slip-resistant flooring which may be easily cleaned to provide comfort for the greyhound. This may be provided by carpet, a mat or purpose designed material such as veterinary fleece bedding. The cage should be leak proof to prevent any urine leakage. The door must be adequately secured but able to be opened easily without tools in the event of an emergency.

All cages must be thoroughly cleaned between use. Where there is a possibility of cross-infection suitable disinfectant must be used after cleaning.

### Vehicle

The vehicle temperature should be maintained between 10°C and 22°C at all times during transport. When the driver is not in the same space as the Greyhounds a remote monitoring device must display the temperature in the greyhound cabin and be visible from the driver's seat. If the temperature rises above 22°C it is important that dogs are regularly examined for signs of distress and removed from the vehicle to cool down if necessary. Temperature must be monitored and records kept.

Dogs keep themselves cool by evaporating water from their tongues by panting. In conditions of high temperature and high humidity this becomes ineffective and the dog will consequently suffer from heat stroke. It is therefore important that both temperature and humidity are controlled. Consequently wetting a dog to cool it may be counter-productive.

As a rough guide, if there is condensation inside a vehicle it is an indication that the humidity is too high and ventilation must be increased to prevent it.

The vehicle should be designed to provide a minimum of twelve air changes per hour at all times during transport. Cages in vehicles must have at least 40% of the wall area open to allow adequate air flow. This is best provided by a rust-proof (stainless) steel mesh door and back to the cage as well as additional open areas on its sides to allow ventilation through the cage.

Maintenance of temperature control and ventilation must be possible when the vehicle is stationary. This is best provided by full air conditioning. There must be a procedure for the provision of ventilation in an emergency; this may be as simple as opening all vehicle doors.

All vehicles carrying dogs must be equipped with a functioning and regularly serviced fire extinguisher. It may be advisable to provide an indication on the outside of the vehicle that live animals are being carried to alert the emergency services.

### Care during the journey

For any journey over four hours adequate rest stops for watering, feeding and emptying must be included. Water must be provided every four hours, or frequently enough to prevent dehydration. Emptying must be provided every eight hours and food twenty-four hours.

Greyhounds should have free access to water until loaded for a journey. No food should be given for two hours before travelling and an opportunity to empty should be provided immediately before loading.

#### **Additional Guidelines for the transport of sick or injured greyhounds**

- A. A sick or injured dog may only be transported to enable it to be treated. A dog which is unable to fully stand on all four legs or is very close (before and after) to whelping is specifically excluded by WATO from routine transport. Similarly, puppies with unhealed navels are considered unsuitable for transport.
- B. The journey time for transport should be the minimum necessary to provide veterinary care for the greyhound. It is accepted that orthopaedic injuries may require a relatively lengthy journey to a specialist surgeon.
- C. When a greyhound is in severe pain appropriate pain relief must be provided by a veterinary surgeon. Where the pain is a result of a fracture consideration should be given to some form of temporary immobilisation of the fracture to reduce pain during transport. It may also be advisable to provide sedation in addition to pain relief. The veterinary surgeon in whose care the greyhound is at the commencement of the journey should be able to ensure that the pain relief and/or sedation provided will last for at least the proposed length of the journey. If this is not possible arrangements must be made for additional medication to be administered en route.
- D. An injured greyhound should preferably be transported in a vehicle where a person can at all times be with the dog to assist in restraint. A car is ideal.
- E. Because an injured dog is likely to be suffering from shock the vehicle temperature should be maintained at a minimum of 20°C and additional bedding should be supplied.