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Greyhound Racing (Offences) (Scotland) Bill

Summary of Rural Affairs and Islands Committee Targeted Call for Views

This document summarises responses to the Rural Affairs and Islands (RAI) Committee's targeted Call for Views (CfV) on the Greyhound Racing (Offences) (Scotland) Bill. The RAI Committee agreed to issue a targeted CfV to those organisations who had responded to the consultation on the draft Bill proposal.

Links to responses and respondent information

- <u>Dogs Trust</u> UK's largest dog welfare charity, cares for around 11,000 dogs across 21 rehoming centres (two in Scotland) and campaigns on dog welfare.
- <u>GREY2K USA Worldwide</u> non-profit advocating for greyhound protection laws, to end racing and promote the rescue and adoption of greyhounds.
- <u>Greyhound Awareness Cork (Ireland)</u> An advocacy group "campaigning to end the exploitation of Greyhounds in Ireland and across the Globe".
- <u>Greyhound Board of Great Britain (GBGB)</u> industry regulator for greyhound racing.
- The League Against Cruel Sports UK based animal welfare charity.
- OneKind Scottish animal welfare charity.
- Say No To Greyhound Racing in Scotland formed in 2017 to campaign against a new track (East Lothian) and for the abolition of greyhound racing in Scotland.
- <u>Scotland Against Greyhound Exploitation</u> Scottish charity campaigning for a ban on greyhound racing. (Gill Doherty – the petitioner – also submitted <u>an abridged</u> version of the same group's response as an individual).
- Scotland for Animals Scottish animal welfare charity.
- Scottish Greyhound Sanctuary rehomes greyhounds in Scotland.
- Scottish Society for the Prevention of Cruelty to Animals (Scottish SPCA) –
 Scottish animal welfare charity, inspectors authorised to enforce animal welfare laws under the Animal Health and Welfare (Scotland) Act 2006.
- Thornton Greyhound Track only remaining greyhound track in Scotland, "currently not racing due to the totally unacceptable vilification of greyhound racing". The response states that had it not been for this, "the Stadium would have been racing under GBGB rules", and "would have been a thriving business".

Section 1 offence

Q1: The Bill (section 1) would make it an offence for a person who owns or is responsible for a greyhound, to race that greyhound on an oval racetrack or knowingly permit another person to race that greyhound.

Respondents were asked if they agreed with this (Yes/No/Don't Know).

- Responded yes: GREY2K USA Worldwide, OneKind, Dogs Trust, Scottish Greyhound Sanctuary, Scottish SPCA, SAGE, League Against Cruel Sports, Say No to Greyhound Racing in Scotland, Scotland for Animals
- Responded no: Thornton Greyhound Track, GBGB

Those who agreed with section 1:

All of the animal welfare groups who responded to this question agreed with the introduction of the offence proposed in section 1. In support of this view, several responses referred to greyhound racing as inherently cruel or risky, and most responses raised multiple animal welfare concerns related to racing – most frequently the incidence of injuries and fatalities during racing. Several responses referred to GBGB data on injuries and fatalities as demonstrating the extent of the issue.

Injury and fatality risk

The **Scottish SPCA** said greyhound racing is inherently cruel and cannot be reconciled with modern animal welfare standards, "risks of injury and death are unacceptably high", with GBGB data showing suffering is "systemic, not incidental".

Scotland Against Greyhound Exploitation (SAGE) said that injury and fatality risks "cannot be mitigated by enhanced welfare initiatives" as the mechanics of racing will always put greyhounds at unacceptable risk.

OneKind said that GBGB 2024 injury and fatality data showed that 346 dogs died last year at GBGB-tracks, excluding those who died from natural causes or terminal illness. This was an increase in the number of deaths for the first time in two years, despite there being fewer dog runs in 2024 than the previous two years. An additional 3,809 dogs were injured. This means that, since 2017 when GBGB death and injury records have been publicly available, 3,957 greyhounds have died in GBGB-licensed racing, and 35,168 injuries have been recorded.

Its response provided a number of 'case studies' of ex-racing dogs which it said demonstrate the range of injuries, including hock injuries frequently seen in raced greyhounds and rarely in other breeds; other leg fractures; soft tissue injuries; amputation as a result of injury; osteoarthritis, head injuries; poor dental health, digestive problems; organ damage; separation and other forms of anxiety.

Dogs Trust said that injuries caused through running at speed around oval tracks are well documented and seldom seen in other breeds of dog¹, and in some cases lead to euthanising the dog (also referencing <u>GBGB's 2024 statistics</u>).

It said that ex-racing greyhounds have entered Dogs Trust care with injuries and the cost of managing these is significant (over £4000 in some cases). It said that the funding provided by GBGB via its Greyhound Retirement Scheme (£420) is often significantly lower than what is required, and also that following the change in Dogs Trust's position on greyhound racing it was removed from the Scheme, which "calls into question GBGB's claim that welfare is at the heart of their strategy".

Burden on rescue and rehoming sector

Several respondents said that greyhound racing creates a burden for rehoming charities and organisations.

The **Scottish SPCA** said that "Although the number of racing greyhounds in Scotland is smaller than in the rest of the UK, dogs that retire or are injured often require specialist care and support before they can be rehomed. Charities, including the Scottish SPCA, are regularly involved in providing this care. The welfare needs of these dogs can be complex, reflecting both the physical strain of racing and the challenges of adapting to domestic life after time in kennels."

Scottish Greyhound Sanctuary said there was a "rehoming crisis". It said that since 2008 it has rescued around 1700 greyhounds, "surrendered due to injuries sustained on the track or because they were simply surplus to requirements" and that "Many were signed over to vets to be euthanised, when sympathetic vets were able to convince owners to surrender to SGS instead".

Its response said that "Racing in Scotland began to dwindle after Armadale flapping track closed in 2016, leaving only Shawfield in Glasgow and Thornton in Fife. The pandemic saw Shawfield close its doors for good in March 2020. Thornton flapping tracked limped along with occasional races until February 2025 when the bookmaker resigned. Although presented as a "hobbyist sport" no racing ever took place without a bookmaker present. The last 3 dogs to race at Thornton were surrendered to our care earlier this year".

However, the **Scottish Greyhound Sanctuary** further set out that "The lack of racing in Scotland since then has NOT reduced the number of greyhounds we are asked to rescue. It said that "the churn of greyhounds from Ireland into England means there is a never ending waiting list". Our kennels are continually full, as are our foster homes, and we have a waiting list. We turn dogs away on a weekly basis." It gave examples of "common injuries" of ex-racing greyhounds - including orthopaedic injuries (torn ligaments, dislocation and fractures, injured tendons, toe amputation), arthritis and muscle injuries. Other health implications were raised

Engineers, Part K: Journal of Multi-body Dynamics. 2019;233(4):1033-1043.

¹ References provided: Knight A. Injuries in racing greyhounds. Cleveland, UK; 2018. Stafford, K. (2006) The Welfare of the Athletes; Greyhounds and Sled Dogs. In Stafford, K. (Eds) The Welfare of Dogs. Springer. The Netherlands. pp 144-152 and Hayati H, Eager D, Walker P. The effects of surface compliance on greyhound galloping dynamics. Proceedings of the Institution of Mechanical

including dental, digestive, skin and heart problems, and behavioural issues due to "lack of exposure to the outside world".

Previous petition evidence and Scottish Animal Welfare Commission (SAWC) report

Some respondents highlighted that evidence already provided to the RAI Committee in relation to the petition (<u>PE1758: End Greyhound Racing in Scotland</u>), and in the 2023 SAWC report, supports the need to ban greyhound racing for welfare reasons.

OneKind for example said that the risks to the health and welfare of raced greyhounds have been well documented, including in the evidence relating to PE1758, SAWC report, and responses to the Member's consultation.

Scotland Against Greyhound Exploitation (SAGE) said that the RAI petition remains the most-signed petition in Scottish parliamentary history with 29,749 signatures to date which speaks to the "level of public appetite for an end to greyhound racing". It referred to its <u>oral evidence to the RAI Committee in April 2022</u> which set out its concerns, and said that evidence had been provided through the petition and SAWC report of the harms racing greyhounds experience relating to: overbreeding, "wastage" (where dogs "do not make the grade for racing" and are destroyed or missing), poor transport conditions, kennelling quality of life, doping, the rehoming burden (on average at age 3) and injuries and deaths.

GREY2K USA Worldwide also wished to refer the Committee back to its earlier responses in support of PE1758 (<u>June 2023</u> and <u>to 2023 RAI call for views</u>).

Alternatives to a ban e.g. regulation/licensing

Several responses said that a full ban on greyhound racing was the only way to address the animal welfare issues associated with it, and alternatives such as increasing regulation via licensing would not be sufficient.

For example, **Dogs Trust** said that licensing or industry reform is "not the answer" and will not address inherent issues associated with the industry, and that regulation has not been effective in protecting greyhound welfare in England. Similarly, the **Scottish SPCA** said that the layout of oval tracks makes them inherently unsafe, and that these risks cannot be effectively mitigated through regulation or licensing.

Developments in other countries since RAI inquiry

A few respondents highlighted developments in other countries since the RAI inquiry: New Zealand has announced an intention to end greyhound racing, and the Welsh Government has recently introduced a Bill to ban greyhound racing. The Australian state of Tasmania has also recently committed to phasing it out. The **Scottish SPCA** said that "Scotland now has the opportunity to join progressive nations in protecting dogs from unnecessary harm".

Other comments

SAGE noted that the Bill goes a "step further" than the Bill in Wales as it introduces penalties for both track operators and individual owners. It said this is "very positive" as it means that all parties involved in racing would be committing an offence.

Regarding the need for the Bill given there is only one track: **GREY2K USA Worldwide** said that "this should not deter policy makers from opting for a legislative route. Without legislation there is nothing to stop this track becoming a regulated track, or further tracks, regulated or unregulated, opening in the future. Wales was in a similar situation with only one unregulated track which became regulated in January 2024."

Those who did not agree with the section 1 offence:

Thornton Greyhound Track and GBGB did not agree with the section 1 offence (or the principle of a ban on greyhound racing in general).

Key points made in **Thornton Greyhound Track's** response:

- Data "included in" the Bill refers to greyhound racing in England and Wales, which "bears no resemblance to greyhound racing in Scotland".
- Regarding injury data greyhound racing is the only sport that has to report
 every injury when a greyhound comes off the track lame, whereas e.g. horse
 racing only reports injuries that result in a fatality.
- Greyhound racing is not illegal in any country, it is just not a commercial activity.
 It takes part all over the world on a hobby basis and Scotland would be the only country to threaten to put people in prison for racing a greyhound around a track.
- Animal activists are largely the only people to have responded to consultations.
- "A greyhound loves to race" and "they are not forced to do it".
- The response suggests the Scottish Government decision to support the Bill was for political reasons rather than animal welfare concerns.

Key points made in **GBGB's** response:

- The Bill "will not improve greyhound welfare" as it does not "promote meeting greyhounds' welfare needs across their lifetimes" (across the Five Domains of animal welfare) through evidence-based policy making and enforcement. A ban would take up "valuable legislative time".
- It states that "If the Scottish Parliament is serious about optimising greyhound welfare" then it should not support the Bill but should "instead support legislation to bring greyhound racing in Scotland under the regulation of GBGB", as welfare is "best protected when racing occurs in a public space and where regulation provides enforceable mechanisms" and that were a ban to be introduced, there is a "risk that the activity would be driven underground".
- The UK Government has "confirmed its support for licensed greyhound racing" referencing statements made on 27 February 2025 and on 9 October 2024.
- A ban would "remove future opportunities for positive economic impacts" citing economic impacts of GBGB-tracks e.g. revenue for bookmakers (£213 million in 2022), tax revenue (£52 million annually), and total annual economic contribution of £166 million (£96 million direct, £70 million indirect in 2022).
- "There are a number of GBGB-licensed, Scotland-based greyhound trainers who travel across the border to race at a regulated track in England. There does not

- appear to be any consideration given to what would happen to these individuals' livelihoods if a ban were to be implemented, nor to the complications of their need to travel or to exercise their greyhounds on the border".
- The response said there is no legislation proposed to ban other working or recreational activities involving dogs e.g. competitive field-trials, whippet racing.
- Detailed information was provided about GBGB-standards, including its Greyhound Commitment, Rules of Racing, and welfare strategy 'A Good Life for Every Greyhound'², through which "GBGB seeks to ensure that the health and wellbeing of all registered greyhounds are promoted and protected at all times":
 - Breeding: Whilst GBGB's remit does not extend to breeding, it aims to support high-welfare breeding. In 2024, 15.5% of greyhounds registered were British-bred (up from 13.1% in 2021), with the remainder originating from Northern Ireland or the Republic of Ireland. GBGB works with Greyhound Racing Ireland to ensure the traceability of greyhounds entering GBGB racing from Ireland. It is also developing a registration system for British-bred greyhounds and plans to publish a Code of Practice for Breeders.
 - During their racing career (at track): GBGB standards cover transportation, vet attendance, inspections, anti-doping rules, track maintenance and recording of injuries and fatalities. It said that between 2018 and 2024, the fatality rate decreased by 50% and in 2024, licensed racing saw its lowest ever injury rate of 1.07%. GBGB is currently funding two academic research projects looking at injury prevention, and has implemented a 'Four Day Rule' which states that a greyhound shall not run more than once in a four-day period with a maximum six runs in 28-days, aiming to ensure recovery time.
 - During their racing career (at kennels): Standards cover inspections of kennels and a Code of Practice for Residential Kennels is provided.
 - Into Retirement: Through its Greyhound Retirement Scheme, a £420 bond is made available to certain rehoming centres. In Scotland it states there are seven homing centres which use the Scheme.

Section 2 offence

Q2: The Bill (section 2) would also make it illegal for someone who owns or is responsible for an oval racetrack, to allow people to race greyhounds on that racetrack.

Respondents were asked if they agreed with this (Yes/No/Don't Know).

- Responded yes (agree): GREY2K USA Worldwide, OneKind, Dogs Trust, Scottish Greyhound Sanctuary, Scottish SPCA, SAGE, League Against Cruel Sports, Say No to Greyhound Racing in Scotland, Scotland for Animals
- Responded no (do not agree): Thornton Greyhound Track, GBGB

Those who agreed with section 2:

² References provided for progress reports on the welfare strategy: October 2025 progress report and December 2024 progress report on 'A Good Life for Every Greyhound

All animal welfare organisations who responded agreed with introducing the section 2 offence, which targets the track owner or operator.

SAGE said that this was "an important aspect" of the Bill which would deter the last tracks in Scotland reopening and prevent other tracks being proposed in the future.

GREY2K USA Worldwide said it is "equally as important to create an offence that prevents track owners or organisers from enabling greyhound racing, as it is to prevent greyhound owners or the person responsible for that dog being able to race the animal". **OneKind** said that "Together with the first offence, this will have the effect of entirely prohibiting greyhound racing in Scotland".

Scottish SPCA said this would be a "vital step" in "closing the loophole that currently allows unlicensed tracks to operate without any regulatory oversight". It said that between 2017 and 2020, 15 greyhounds died and 197 sustained injuries at Shawfield, and "At unlicensed venues like Thornton, the absence of oversight means the true extent of harm remains unknown". It said that given Thornton is unlicensed, the "lack of veterinary support, absence of drug testing, and the likelihood of older, ex-registered racing dogs being sold on to race at Thornton, despite age-related vulnerabilities, further compound the welfare risks".

The Scottish SPCA also said it had "carried out investigations into greyhound trainers suspected of administering illegal substances to dogs" but "due to limitations in testing procedures at the time, the Procurator Fiscal was unable to pursue prosecutions. This gap in accountability underscores the urgent need for a legislative ban on greyhound racing in Scotland".

Dogs Trust also commented on standards at unlicensed tracks. It noted that the SAWC report had set out that whilst there is no robust data on injuries at unlicensed tracks (as there is no requirement for disclosure), equally there is "no reason to believe that the risks are any different/lesser in Scotland from elsewhere in the UK". It said that while Thornton refers to itself as a 'hobbyist' track, the lack of a bookmaker has resulted in the cancellation of races which suggests that racing at Thornton is not solely to take part in the activity without commercial gain. It also said that (in relation to the potential impact of the Bill), implications to employees at Thornton should be minimal, as three employees were registered on the Company House website (2023-24), and as Thornton self-refers as a 'hobbyist' track, it is not expected that anyone racing their dogs there would lose substantial income.

Those who did not agree with the section 2 offence:

Thornton Greyhound Track and GBGB did not agree with the section 2 offence (or the principle of a ban on greyhound racing in general).

Thornton Greyhound Track challenged the view of the Member in charge of the Bill that greyhound racing is inherently dangerous. It said that "Thornton Greyhound track when it was racing was one of the safest tracks in the UK, in the last 5 years there have been very few serious injuries".

GBGB set out in disagreeing with this proposed offence (which bans operating an oval racetrack specifically, via the definition of racetrack) that "an exclusive focus on

the shape of the track is unlikely to have any meaningful impact upon greyhound welfare". It said that the causes of injuries include track design and surface but also a multitude of other factors e.g. gender, genetics, fitness, diet, exercise and frequency of racing. It said that this is demonstrated by the fact that GBGB track injury and fatality rates have fallen significantly whilst oval tracks remain the norm.

Definition of racetrack

Q3: The Bill defines 'racetrack' as one that is oval in shape, but it allows the Scottish Government to amend this through secondary legislation so that racing could be banned on other types of tracks in the future.

Respondents were asked if they agreed with this (Yes/No/Don't Know).

- Responded yes: GREY2K USA Worldwide, OneKind, Scottish Greyhound Sanctuary, Scottish SPCA, SAGE, Say No to Greyhound Racing in Scotland.
- Responded no: Dogs Trust, GBGB, Thornton, Scotland for Animals

Whilst every animal welfare organisation agreed with banning racing on oval tracks, **there were different views** on whether defining racetrack as "oval", or more generally, limiting the ban to this type of racetrack, was appropriate.

Whilst it was generally recognised that - given all tracks in Scotland and across the UK are thought to be oval - the effect of the Bill is to ban greyhound racing, there were also concerns that this could be a "loophole" enabling racing to continue in future e.g. on straight tracks. On the other hand, some respondents considered the approach in the Bill to be 'pragmatic' or 'evidenced-based' given data on injuries is generally from oval tracks.

OneKind, the Scottish SPCA, SAGE and the League Against Cruel Sports agreed with the approach in the Bill:

OneKind said that the evidence-base that greyhound racing poses an inherent risk of injury and death is from oval tracks, as that is how almost all racing is conducted. Racing at speed around an oval track increases risk of injury because:

- Dogs are raced anti-clockwise, putting strain on their left foreleg/right hindleg;
- Centrifugal force pulls greyhounds towards the outside of the track so if they fall, they often crash into the fence; and
- Greyhounds slow as they enter bends and bunch together to keep the lure in sight. The resulting congestion frequently leads to collisions and falls.

One Kind said that "Thus, to have clear, evidence-based legislation, this is the right approach". It did however agree that including the powers for Ministers to amend the legislation to include other tracks was "an important safeguard", also noting that in oral evidence to the RAI committee in March 2024, a GBGB trainer said that "Straight tracks could have an adverse effect, because a dog has to run faster in a straight line over 500m than it does when there is a bend. They do not keep up the speed on the bend, although they might get up to a good speed, but, if they were to

run flat out for 500m, there would be more chance of injury." Therefore, different track designs could potentially alter the type of injuries but not reduce them.

Similarly, the **Scottish SPCA** said "This is a pragmatic, future-proof approach. While oval tracks present the greatest welfare risks, international evidence shows that straight tracks, while safer, still carry injury risk. Data from Queensland, Victoria, and South Australia show injury rates were significantly higher on oval tracks, with all recorded fatalities occurring on oval tracks" Therefore, allowing the definition to be amended by secondary legislation will ensure the law can adapt.

The Scottish SPCA however also suggested there was a need for **clarity on other forms of racing**. It said that while this Bill "rightly focuses on oval greyhound racetracks", it is important to recognise that other types of racing, such as straight-track events, whippet racing, or unregulated forms of racing, can also raise welfare concerns. It recommended that the Scottish Government continues to gather evidence on all racing activities involving dogs in Scotland, to identify whether additional safeguards or regulation may be needed in future.

The League Against Cruel Sports said that there is clear evidence that greyhound racing carries an inherent risk, particularly because it takes place on oval tracks", and that "Since all former operating tracks in Scotland and ones across the UK are oval, introducing clear, evidenced-based legislation is the right approach". Similarly, SAGE said that racing has typically been carried out on oval tracks (primarily for viewing enjoyment) which present the greatest risk, therefore targeting oval tracks is logical, however it is "vitally important that there will be the ability to amend the bill at a later stage" should there be industry attempts to change the configuration.

However, **Dogs Trust, Say No To Greyhound Racing in Scotland, Scottish Greyhound Sanctuary** and **GREY2K USA Worldwide** considered that the Bill should seek to ban all greyhound racing.

Dogs Trust said it "would urge for all designs and shape of racetrack to be included on the face of the Bill" as "This would stop a loophole that would allow greyhound racing to continue on another design or shape of racetrack until secondary legislation could be introduced". It said that this would align with the recommendation of SAWC in its report that no further new greyhound tracks should be permitted in Scotland. It suggested amending the definition of "track" to: 'Any racetrack or venue that involves the racing of greyhounds for commercial or non-commercial gain; this includes premises or land where a race trial or sales trial occurs.' It also suggested amending the term "race" to ensure that commercial, non-commercial, or recreational activity of racing greyhounds and associated activities are covered.

GREY2K USA Worldwide also considered the definition of racetrack to be a loophole in the Bill. It said that "while we understand the reason for explicitly defining a track as being oval in this Bill", and while it supports the powers enabling racing to be banned on other types of track in future, its "preference at this stage would be to amend the Bill as early as possible to remove the definition of a track as being oval", as "this could potentially open up a loophole for greyhound racing to continue in Scotland in the future".

Say No To Greyhound Racing in Scotland said that "all racing should be banned whether taking place on oval or straight tracks", citing a 2021 report by the Australian group Coalition for the Protection of Greyhounds, 'The Case for Straight Tracks', which showed that serious injuries still occur on straight tracks.

Scottish Greyhound Sanctuary said that oval tracks are just one of many issues that impact on greyhound welfare and that all greyhound racing should be banned.

GBGB said that it does not consider that an exclusive focus on track shape or type is an effective way of having a meaningful positive impact on greyhound welfare (see its views on the section 2 offence for context).

Further views or suggestions on the Bill

Q4: Is there anything missing from the Bill that you expected or wanted to see included?

Q5: Do you have any other comments on the Bill?

Comments on provisions on the Bill:

GBGB raised concerns about how deprivation orders (section 5) or seizure orders (section 7) would work in practice, stating that they "present a serious threat to greyhound welfare". It said that whilst those provisions require the court to have 'considered the need to ensure the welfare of the greyhound', no details are given as to how that would be assessed, and how welfare would be safeguarded in the case of court-ordered 'sale' or 'another disposal' of a greyhound.

What is not in the Bill/comments about wider issues:

Several respondents raised issues about greyhound welfare 'beyond the track' including concerns about kennelling standards (including where GBGB-kennels are based in Scotland) and movement of dogs for racing outwith Scotland.

The **Scottish SPCA** said that "the welfare of greyhounds must be considered across their entire lives" including how they are bred, reared, trained, transported and retired. It said that the welfare of parent animals, and the fate of dogs bred to race but who never compete, are also key areas of concern and it "would support a wider review of these issues" to ensure a consistent standard of welfare.

Dogs Trust said that it would urge consideration to be given to regulation of greyhound kennels, as racing greyhounds can spend 95% of their time in kennels and there is no oversight of this. It said that a Dogs Trust investigation in 2015³ (which focused on GBGB-trainers) found kennels to be in a poor state of repair which posed a risk of injury, some were covered in faeces and urine, some had inadequate lighting and there was no evidence of socialisation. It said that for dogs

³ The Greyhound Industry: Don't Bet on Fair Treatment, Dogs Trust 2015 (the respondent said this report was "available on request")

racing at unlicensed tracks, there is even less oversight, and that general animal welfare legislation is not sufficient here as what constitutes a welfare concern for a greyhound compared to a domestic family pet can be challenging for an enforcement agency to assess, especially as greyhound racing remains a legal activity.

Dogs Trust said it would also support regulation for greyhound trainers that reside in Scotland whose dogs are raced in other jurisdictions, stating that the SAWC report set out that the Greyhound Awareness League rehomed around 120 ex racing greyhounds in Scotland each year which is much higher than the number of dogs racing in Scotland each year.

SAGE said that while the bill remit is "understandably narrow as it tackles the fundamental mechanics of racing and the risk of injury and death that greyhounds face", there are still potential risks for greyhounds kennelled in Scotland (stating "there are several professional greyhound racing kennels in Scotland") but raced in England or elsewhere, in relation to quality of life, kennelling standards, transport conditions, breeding concerns, doping, and life after racing.

Say No To Greyhound Racing in Scotland said that "it is clear that the danger of oval tracks is not the only welfare issue" but that kennelling, long journeys and lack of socialisation are further issues, and said that it is "aware of many welfare issues related to English racing which involves Scottish trainers".

Greyhound Awareness Cork said: "Greyhound deaths and injuries are not accidental but a predictable outcome in the industry. But deaths are not just confined to the racing tracks, research using statistics received from Greyhound Racing Ireland via the Irish Department of Agriculture shows that of the 2021 born greyhounds remaining in Ireland, one fifth are already dead. These would be four year old dogs when their natural lifespan would be 13 to 14 years old".

It also raised that surgical artificial insemination is a procedure that is banned in many countries including the UK due to it being considered unethical and invasive, and is now banned for all dogs in Ireland, with the exception of greyhounds. It said that even though surgical artificial insemination for dogs "is banned in Scotland, the greyhound industry profits from it and there have been instances where greyhounds have been sent to Ireland to be bred from and returned while in pup". It said that the greyhound racing industry also has issues with export of dogs to countries such as China, Pakistan and Spain which all have little or no animal welfare protection, and that "Dogs are still testing positive for substances such as cocaine. Greyhounds regularly test positive for pain medication which would indicate that injured dogs are still forced to run".

Transition and rehoming i.e. implementation of the Bill

The **Scottish SPCA** said that rehoming support should be explicitly considered, as thousands of greyhounds are displaced by the racing industry each year across the UK, and while numbers in Scotland are much smaller, care will still fall on animal welfare charities and volunteers. It said that the Scottish SPCA and Dogs Trust have committed to taking in and rehabilitating any dogs that come from the track.

Regarding the timeframe for implementation, **Say No to Greyhound Racing in Scotland** said that whilst other countries may need to introduce a phased ban because of the numbers of greyhounds who will require rescue, Scotland should be able to facilitate an immediate ban due to the far fewer number of dogs needing homed (due to Shawfield closing down and the lack of racing at Thornton).

Post-legislative review

OneKind said that the impact of the ban should be monitored and the next Scottish Government should act swiftly to alter the legislation if it appears that racing is being displaced onto other track designs or dog welfare otherwise compromised. Similarly, **Dogs Trust** suggested a review should be undertaken after an adequate timeframe (after 2 years/no more than 5 years), including consideration of whether there has been a rise in other breeds used in racing or evidence of illegal underground activity.