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Convener
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The Scottish Parliament
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c/o Scottish Animal Welfare Commission Secretariat
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Dear Finlay

In its consideration of the Petition to ban greyhound racing in Scotland (**PETITION PE1758: END GREYHOUND RACING IN SCOTLAND**) on 20th April the Rural Affairs, Islands and Natural Environment Committee agreed to write to the Scottish Animal Welfare Commission for its views on this issue. The letter was received on 29th April 2022. The RAINE Committee specifically asked for:

- further information about the Commission's views about the welfare of greyhound racing in Scotland generally;
- more specifically, the Commission's views on unlicensed greyhound racing tracks operating in Scotland; and
- what consideration the Commission has given to including and/or prioritising this issue within its work programme.

SAWC has previously responded to a query about prioritisation of welfare issues in its work, and why greyhound racing was not planned to be considered at an earlier point in our work. Note we have already stated our intention that we would consider this issue once the Dogs Trust funded piece of work on this area was completed to avoid duplication of effort when there are many other welfare issues that are also very relevant to Scotland. However, in response to the specific questions raised:

1) The welfare of greyhounds used in racing in Scotland

In any industry where animals are involved in financial gain there are risks of exploitation and poor welfare standards. This is true of greyhound racing as with any other species used for commercial purposes, and where properly enforced regulation

can help reduce poor practice. In considering the welfare of racing greyhounds we consider there to be two levels of concern: firstly if there is habitual poor practice that the industry cannot or will not act to mitigate and secondly if there is inherent poor welfare for dogs of being involved in the racing industry.

In the first category of welfare issues, administration of banned substances to dogs, lack of regulation and lack of transparency and enforcement would seem to be important considerations. These issues have been raised by the Petitioners and we agree that these are detrimental to greyhound welfare. In theory, these could be mitigated by more rigorous enforcement to improve the welfare of the dogs involved in the industry.

The more challenging area is the second category of issues, which are those specifically related to greyhound racing where welfare may be inherently poor, and opportunities to mitigate welfare issues may not be possible. There is little scientific literature on welfare of racing greyhounds but a few studies (particularly in Australia) have considered the main welfare issues for these dogs, focusing particularly on lack of regulation of breeding, rearing, training and competition; high risks of injury and deaths in some types of competition; over-breeding and oversupply; and euthanasia of dogs considered to be surplus to requirements (McEwan & Skandakumar, 2011¹; Hampton et al., 2020²).

We have not thoroughly investigated the welfare issues for each of these areas but would consider that these areas would also be points for evaluating the welfare of dogs used in racing in Scotland. With the exception of the supply of dogs to Scotland (where more than 80% of dogs are bred in Ireland, and there is evidence of oversupply³), and the incidence of licensed racetrack injuries and fatalities (approximately 1.15% and 0.06% respectively of dog runs per annum; GBGB figures) there is very little empirical evidence. We are aware of concerns about specific types of injury due to racetrack designs and that some initial work has suggested that differing track designs could reduce race injuries (Hayati et al., 2017⁴, Eager et al., 2021⁵).

2) Views on unlicensed tracks in Scotland

SAWC does not support the continuation of unlicensed (flapper) tracks in Scotland. If greyhound racing is to continue then this should only be under specific regulations to protect dog welfare and with the presence of a veterinarian at the track to inspect fitness to race, to ensure that dogs are not over-raced and welfare regulations have been met, and to administer prompt veterinary care should this be required.

¹ McEwan & Skandakumar, 2011 The welfare of greyhounds in Australian racing: Has the industry run its course. Australian Animal Protection Law Journal, 6 pp53

² Hampton et al 2020 Social license and animal welfare: Developments from the past decade in Australia. Animals 10, 2237

³ <https://stand.ie/greyhound-racing-is-fast-approaching-its-final-lap/>

⁴ Hayati et al 2017 The impact of track related parameters on catastrophic injury rate of racing greyhounds. Proceedings of the 9th Australasian Congress on Applied Mathematics.

⁵ Eager et al., 2021 Analysis of racing greyhound path following dynamics using a tracking system. Animals 11, 2687

3. Consideration of including this topic in our workplan

SAWC is an independent body that provides advice to Ministers. It takes an egalitarian approach to prioritising its work, based on severity of welfare issues affecting all sentient animals in Scotland. We have paid close attention to the progress of concerns and discussions around this topic, in particular the extensive evidence provided to the Committee by advocacy groups, and are aware of the potential welfare issues and numbers of animals involved in racing in Scotland. As stated above, our intention is to respond to this issue following completion of Dogs Trust's report on greyhound racing. However, the Committee may well feel that it has already gathered sufficient information to make a recommendation to the Scottish Government.

I hope that these comments are of interest and we will be pleased to provide more detailed views from the SAWC if required.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Cathy Dwyer', with a stylized, cursive script.

Professor Cathy Dwyer
Chair
Scottish Animal Welfare Commission