

08 February 2024

Consultation by Mark Ruskell MSP

Member for Mid Scotland & Fife region

# PROPOSED PROHIBITION OF GREYHOUND RACING (SCOTLAND) BILL

A proposal for a Bill to promote the welfare of greyhounds by introducing an offence of permitting a greyhound to race at racetracks in Scotland.



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## Foreword

Since the Scottish Parliament was established in 1999, many subjects have been highlighted through the public petitions process. Petitions have helped issues get the attention and scrutiny they deserve and in some cases the law has been changed as a result.

The proposal for this bill is inspired by *Petition PE1758: End Greyhound Racing in Scotland*, which has provided a focus for recent parliamentary consideration of the welfare of racing greyhounds.

The concerns are not new. When the Scottish Parliament first discussed the Animal Health and Welfare (Scotland) Bill 2006, I raised questions about whether the provisions of the bill would fully address the needs of greyhounds.



In the years since, it has become clear to me that the welfare of racing greyhounds has not been adequately protected by existing law.

Too many dogs are injured and die as a result of racing on tracks in the UK. The inherent risks of racing greyhounds on tracks at high speed have not gone away. Given the weight of evidence, I believe it is now time to follow many other jurisdictions around the world and to end greyhound racing for good.

This consultation puts forward that proposal and I hope that it will engage people on all sides of the debate.

Mark Ruskell MSP

8<sup>th</sup> February 2024



# How the Consultation Process Works

This consultation relates to a draft proposal I have lodged as the first stage in the process of introducing a Member's Bill in the Scottish Parliament. The process is governed by Chapter 9, Rule 9.14, of the Parliament's Standing Orders which can be found on the Parliament's website at: [Scottish Parliament Standing Orders](#)

At the end of the consultation period, all the responses will be analysed. I then expect to lodge a final proposal in the Parliament along with a summary of those responses. If that final proposal secures the support of at least 18 other MSPs from at least half of the political parties or groups represented in the Parliamentary Bureau, and the Scottish Government does not indicate that it intends to legislate in the area in question, I will then have the right to introduce a Member's Bill. A number of months may be required to finalise the Bill and related documentation. Once introduced, a Member's Bill follows a 3-stage scrutiny process, during which it may be amended or rejected outright. If it is passed at the end of the process, it becomes an Act.

At this stage, therefore, there is no Bill, only a draft proposal for the legislation.

The purpose of this consultation is to gather a range of views on the subject matter of the proposed Bill, highlighting potential problems, suggesting improvements, and generally refining and developing the policy. Consultation, when done well, can play an important part in ensuring that legislation is fit for purpose.

The consultation process is being supported by the Scottish Parliament's Non-Government Bills Unit (NGBU) and will therefore comply with the Unit's good practice criteria. NGBU will also analyse and provide an impartial summary of the responses received.

Details on how to respond to this consultation are provided at the end of the document.

Additional copies of this paper can be requested by contacting me at:

Mark Ruskell MSP  
MG.12  
The Scottish Parliament  
EH99 1SP  
0131 348 6468  
[Mark.Ruskell.MSP@parliament.scot](mailto:Mark.Ruskell.MSP@parliament.scot)

Enquiries about obtaining the consultation document in any language other than English or in alternative formats should also be sent to me.

An online copy is available on the Scottish Parliament's website at: <https://www.parliament.scot/greyhound-racing-ban> under Parliamentary Business / Bills / Proposals for Members' Bills.

# Background

## Introduction

The activity of greyhound racing has been taking place in Scotland since the 1920s, and the fundamental principles of the activity, such as the track design, remain largely unaltered to date<sup>1</sup>. It was once considered the UK's third largest commercial leisure activity, only exceeded by the cinema and football<sup>2</sup>. However, since the 1930s, there has been a sustained decline in the activity's popularity in Scotland, which used to be home to over 20 racetracks<sup>3</sup>. Now, there only remains one unlicensed racetrack operating in Scotland, the Thornton Greyhound Stadium in Fife. Greyhounds used in racing have been selectively bred for speed and the performance traits required for sprinting, with dogs able to maintain average running speeds of 40mph during races<sup>4</sup>. As part of a race, typically 4-6 greyhounds chase a mechanical lure in an anti-clockwise direction around an oval-shaped racetrack of varying distances, including 100yd (91m), 300yd (274m), 500yd (457m), and 680yd (622m).

There is an inherent risk of injury and fatality associated with racing greyhounds anti-clockwise around oval racetracks at speeds of up to 40mph. A total of 22,284 injuries and 868 fatalities were recorded within the five-year period of 2018-2022 at licensed racetracks across Great Britain. While the rate of fatalities as percentage of total runs in 2022 (0.03%) decreased significantly compared to the 2018 rates (1.16%), the rate of injuries as percentage of total runs in 2022 (1.20%) was higher compared to 2018 (1.16%).

Despite progress toward improving welfare standards at licensed racetracks across Great Britain, the statistics available illustrate that as long as greyhounds are used in racing they will continue to suffer from inherent risks of injury and fatality. In the Member's opinion, the Animal Health and Welfare (Scotland) Act 2006 does not adequately protect racing greyhounds from injury and fatality as the activity of using greyhounds in racing is currently lawful. The proposed Prohibition of Greyhound Racing (Scotland) Bill would prohibit the use of greyhounds in racing to protect dogs from the inherent harms associated with racing.

There are further animal welfare concerns associated with greyhounds used for racing from birth to death, beyond injury and fatality – including the conditions under

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<sup>1</sup> Knight, A. (2018) *Injuries in racing greyhounds*, WBI Studies Repository. Available from: <https://www.wellbeingintlstudiesrepository.org/cgi/viewcontent.cgi?article=1004&context=comarac> [Accessed on 22 November 2023].

<sup>2</sup> Huggins, M. (2007) "Everybody's going to the dogs"? *The middle classes and greyhound racing in Britain between the wars*. *Journal of Sport History*, 34 (1): pp. 96-120. Available from: <https://insight.cumbria.ac.uk/id/eprint/2781/> [Accessed on 22 November 2023].

<sup>3</sup> Laybourn, K. (2019) *Going to the dogs : a history of greyhound racing in Britain, 1926-2017*. Manchester University Press, Manchester, UK. Available from: <https://manchesteruniversitypress.co.uk/9781526114518/> [Accessed on 22 November 2023]

<sup>4</sup> Hayati, H., Eager, D., Stephenson, R., Brown, T. & Arnott, E. (2019) *The impact of track related parameters on catastrophic injury rate of racing greyhounds*, Proceedings of the 9th Australasian Congress on Applied Mechanics (ACAM9), Sydney, Australia, 2017. 27-29.

which they are bred, reared, transported, trained, raced and homed. The proposal for the Bill will not seek to legislate on these issues, however it will have consequential effects on these associated welfare concerns across the whole life cycle of greyhounds. The Member seeks respondents' views on the draft legislative proposals to prohibit the use of greyhounds in racing in Scotland.

## The Current Situation

The Greyhound Board of Great Britain (GBGB)<sup>5</sup> is the official body responsible for the governance, regulation, and management of licensed greyhound racetracks in England, Wales, and Scotland. It is currently responsible for 21 licensed tracks from Newcastle to Brighton and Hove<sup>6</sup>. The non-operational GBGB-licensed racetrack in Scotland, Shawfield Stadium in South Lanarkshire, has been closed since March 2020. At the time of writing, there are no licensed racetracks operating in Scotland.

The last remaining unlicensed racetrack in Scotland, the Thornton Greyhound Stadium in Fife, operates without oversight from any regulatory body, including the GBGB, or local authority. Unlicensed racetracks, such as Thornton Greyhound Stadium in Fife, are not required to collect or publish data relating to their activities, such as information on the number of owners, trainers, or greyhounds involved in racing, or data on injuries and fatalities at the track, or information about the care of greyhounds post-racing. There is no requirement to have veterinarians present at unlicensed racetracks to assess the health of dogs prior to a race or provide prompt veterinary care for any injured dogs after a race.

In Scotland, there is no statutory licensing scheme applied to greyhound racing. That means that there is currently no requirement for racetracks to be licensed and to follow licensing conditions, such as the standard of kennel facilities at a track, record keeping and traceability and requirement for a veterinary surgeon to be present. This means that, apart from the general welfare protections offered by the Animal Health and Welfare (Scotland) Act 2006,<sup>7</sup> there is no statutory oversight of unlicensed greyhound racing in Scotland.

The Scottish Government launched a consultation, the *Licensing of activities involving animals*<sup>8</sup>, which sought views on proposals to introduce a statutory licensing scheme for greyhound racing. The Scottish Government is currently analysing and considering responses to the consultation, which opened on 04 July 2023 and closed on 26 September 2023. A consultation summary report will be published which will include

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<sup>5</sup> Greyhound Board of Great Britain (GBGB) (2023). Available from: <https://www.gbgb.org.uk/> [Accessed on 22 November 2023].

<sup>6</sup> GBGB (2023) *Racecourses*. GBGB. Available from: <https://www.gbgb.org.uk/racing/race-courses/> [Accessed on 22 November 2023].

<sup>7</sup> Scottish Government (2006) *Animal Health and Welfare (Scotland) Act 2006*. Scottish Government. Available from: <https://www.legislation.gov.uk/asp/2006/11/contents> [Accessed on 22 November 2023].

<sup>8</sup> Scottish Government (2023) *Licensing of activities involving animals*. Scottish Government. Available at: <https://consult.gov.scot/agriculture-and-rural-economy/licensing-of-activities-involving-animals/> [Accessed on 22 November 2023].

an analysis of the responses received and set out the next steps. In the Member's view, while the introduction of a statutory licensing scheme might improve welfare standards at racetracks in Scotland, it would not eliminate the inherent risk of injury and fatality faced by greyhounds whilst racing.

There are no available figures for the number of dogs currently training and racing in Scotland, but the Scottish Animal Welfare Commission ("SAWC") reported that there are 26 licensed trainers in Scotland, with a varying number of dogs per trainer<sup>9</sup>. Licensed trainers in Scotland may race their dogs at other racetracks across Great Britain.

There are currently only seven countries globally where greyhound racing operates commercially: United Kingdom, Republic of Ireland; Australia; Mexico; New Zealand; United States; and Vietnam<sup>10</sup>. However, it is noted that greyhound racing is broadcast in several other countries for gambling purposes. Non-commercial greyhound racing is also operational in other countries, where races may take place without betting involved<sup>11</sup>.

## Racetrack Design

There are numerous factors influencing the risk of injury while racing, including racetrack design and surface, race distance, and starting position<sup>12</sup>. There is widespread evidence that demonstrates the risk of injury on the bends of oval-shaped racetracks experienced by dogs used for racing<sup>13</sup>. This is due to several reasons, including:

- The dogs usually race in an anti-clockwise direction around bends, which leads to pressures on their left forelimb and right hindlimb. These pressures on the limbs can cause long-term anatomical adaptations, creating imbalance, and weakening of the bone, which ultimately lead to a higher risk of injury<sup>14,15</sup>.

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<sup>9</sup> Scottish Animal Welfare Commission (SAWC) (2023) *Report on the welfare of greyhounds used for racing in Scotland*. Scottish Parliament. Available from: <https://www.parliament.scot/-/media/files/committees/rural-affairs-and-islands-committee/correspondence/2023/report-on-the-welfare-of-greyhounds-used-for-racing-in-scotland-sawc-february-2023.pdf> [Accessed on 22 November 2023].

<sup>10</sup> GREY2K USA Worldwide (2023) *Greyhound Racing Around the World*. GREY2K USA Worldwide. Available from: <https://www.grey2kusa.org/about/worldwide.php> [Accessed on 22 November 2023].

<sup>11</sup> GREY2K USA Worldwide (2022) *S6M-05949: Greyhound Racing in Scotland*. Scottish Parliament. Available at: <https://www.parliament.scot/-/media/files/committees/rural-affairs-islands-and-natural-environment-committee/correspondence/2022/petition-pe1758-grey2k-usa-worldwide-submission-of-11-april-2022.pdf>. [Accessed on 22 November 2023].

<sup>12</sup> Knight, A. (2018) *Injuries in racing greyhounds*, WBI Studies Repository. Available from: <https://www.wellbeingintlstudiesrepository.org/cgi/viewcontent.cgi?article=1004&context=comarac> [Accessed on 22 November 2023].

<sup>13</sup> Mahdavi, F., Hossain, M. I., Hayati, H., Eager, D. & Kennedy, P. (2018) *Track Shape, Resulting Dynamics and Injury Rates of Greyhounds*. ASME, International Mechanical Engineering Congress and Exposition.

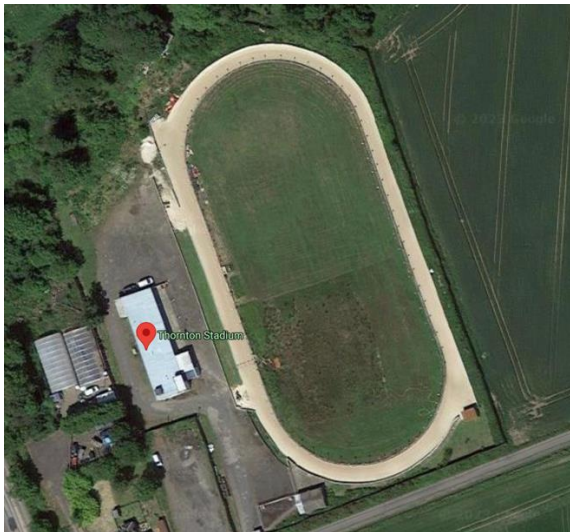
<sup>14</sup> Hercock, C. A. (2010) *Specialisation for fast locomotion: performance, cost and risk*. PhD Thesis, University of Liverpool.

<sup>15</sup> Eager, D., Hayati, H. & Hossain, M. (2017) *Identifying optimal greyhound track design for greyhound safety and welfare*. University of Technology Sydney (UTS).

- The centrifugal force of oval-shaped racetracks pulls dogs to the outside of the track, which leads to a risk of collision with the outside fence<sup>16</sup>.
- Dogs slow down when reaching bends on oval-shaped racetracks, which causes congestion and increases the risk of collision with other dogs and fence. At the same time, as sighthounds, greyhounds attempt to keep the lure in view as they reach bends, which increases the risk of collision with other dogs and fences.

The degree of curvature of racetracks may vary between stadia across the UK, however the majority of racetracks are designed similarly to Thornton Greyhound Stadium in Fife (Figure 1).

**Figure 1. Racetrack Design in the UK**



Note: Thornton Greyhound Stadium in Fife. This picture was retrieved from Google Maps.

## Animal Welfare Concerns

There are widespread animal welfare concerns associated with the welfare of greyhounds used for racing – including the conditions under which dogs are bred, reared, transported, trained, raced and homed, as well as end-of-life care<sup>17</sup>. This proposal for a Bill is focused on the primary animal welfare concern of the inherent risks of injury and fatality associated with using greyhounds in racing.

<sup>16</sup> Eager, D., Zhou, S., Hossain, I., Ishac, K. & Halkon, B. (2022) *Research on Impact Attenuation Characteristics of Greyhound Racing Track Padding for Injury Prevention*. *Vibration*, 5, 497-512.

<sup>17</sup> Scottish Animal Welfare Commission (SAWC) (2023) *Report on the welfare of greyhounds used for racing in Scotland* (2023). Scottish Government. Available at: <https://www.gov.scot/publications/report-welfare-greyhounds-used-racing-scotland-scottish-animal-welfare-commission/> [Accessed on 22 November 2023].



## Injuries and Fatalities

In 2018, following recommendations from the Greyhound Forum<sup>18,19</sup> attended by animal welfare charities, the GBGB launched the Greyhound Commitment<sup>20</sup>. This aimed to improve welfare standards at racetracks and reduce the number of injuries and fatalities in dogs. In 2022, the GBGB launched a long-term strategy, A Good Life for Every Greyhound<sup>21</sup>, building on the Greyhound Commitment, which focused on promoting the welfare of greyhounds used for racing across different stages, including breeding, rearing, racing, and post-racing lives. Despite these commitments from GBGB, data from the tables below (Table 1) illustrate an increase in the rate of injuries sustained by greyhounds in 2022 compared to 2018. The table shows the recorded numbers of injuries and fatalities over the period of 2018–2022 for licensed racetracks across Great Britain operating with oversight by GBGB<sup>22</sup>.

**Table 1. Number of Injuries and Fatalities at GBGB Racetracks between 2018-2022**

	2018	2019	2020	2021	2022
<b>Total No. of Races</b>	426,139	410,607	318,346	359,083	362,427
<b>Total No. of Injuries</b>	4,963	4,970	3,575	4,422	4,354
<b>Injuries as % of Total No. of Races</b>	1.16	1.21	1.12	1.23	1.20
<b>Total No. of Track Fatalities</b>	242	207	200	120	99
<b>Track Fatalities as % of Total No. of Races</b>	0.06	0.05	0.06	0.03	0.03

*Note: The injury data refers to individual injuries, not the number of dogs injured. The data is presented as a proportion of total dog races, not as the proportion of dogs racing. According to the GBGB, there*

<sup>18</sup> The Greyhound Forum consists of a coalition of animal welfare organisations, industry representatives, and other stakeholders with the purpose of improving greyhound welfare. The animal welfare organisations currently involved in the forum, include: Battersea Dogs & Cats Home, Greyhounds in Need, Greyhound Trust, and The Kennel Club. The industry members involved in the forum, include: Greyhound Board of Great Britain, and the Racecourse Promoters Association. In 2023, a range of animal welfare organisations, including Dogs Trust and RSPCA, resigned from the forum due to what they saw as inadequate action and interest from the industry to improve welfare standards at licensed racetracks.

<sup>19</sup> The Greyhound Forum (2023) *The Greyhound Forum*. Available from: <https://www.thegreyhoundforum.com/> [Accessed on 22 November 2023].

<sup>20</sup> GBGB (2018) *The Greyhound Commitment*. GBGB. Available from: <https://www.gbgb.org.uk/about/the-greyhound-commitment/> [Accessed on 22 November 2023].

<sup>21</sup> GBGB (2022) *A Good Life for Every Greyhound*. GBGB. Available from: <https://www.gbgb.org.uk/welfare-care/commitment-to-care/> [Accessed on 22 November 2023].

<sup>22</sup> GBGB (2023) *Annual Injury and Retirement Data*. GBGB. Available from: <https://www.gbgb.org.uk/welfare-care/injury-and-retirement-data/> [Accessed on 22 November 2023].

are currently 21 licensed racetracks in England and Wales<sup>23</sup>. The table includes injuries and fatalities from non-operational stadia that used to be active and hosted races during that period, including Shawfield Stadium in South Lanarkshire which has been closed since March 2020. For the period of 2021 and 2022, the table only includes injuries and fatalities only at licensed stadia in England and Wales, as no other licensed racetracks were operating in Scotland during that period. This table excludes data from unlicensed racetracks, which are not required to publish their injury and fatalities statistics, including Thornton Greyhound Stadium in Fife.

The number of injuries and fatalities in dogs on licensed racetracks across Great Britain within the period of 2018-2022 totals 22,284 injuries and 868 fatalities. The rate of fatalities, as percentage of total runs, in 2022 (0.03%) decreased by 50% since 2018 (0.06%). However, the rate of injuries, as percentage of total runs, in 2022 (1.20%) was higher compared to 2018 (1.16%). It is noted that greyhounds used for racing sustain injuries that are rarely sustained by other dog breeds, particularly injuries on the left forelimb and right hindlimb<sup>24,25</sup>. This is due to greyhounds pushing off with the left forelimb and right hindlimb on the first bend causing higher stress on those bones. The injuries sustained by greyhounds used in racing are outlined in the table below (Table 2).

**Table 2. Types of Injuries at GBGB Racetracks in 2022**

	<b>Total No. of Injuries</b>	<b>No. of Injuries as % to Total No. of Races (362,427)</b>
<b>Hock</b>	817	0.22
<b>Wrist Injuries</b>	706	0.19
<b>Foot Injuries</b>	864	0.24
<b>Hind Long Bone</b>	38	0.01
<b>Fore Long Bone</b>	95	0.03
<b>Fore Limb Muscle</b>	400	0.11
<b>Hind Limb Muscle</b>	944	0.26
<b>Other Injuries</b>	490	0.14
<b>Total Injuries</b>	4,354	1.20

<sup>23</sup> GBGB (2023) *Racecourses*. GBGB. Available from: <https://www.gbgb.org.uk/racing/race-courses/> [Accessed on 22 November 2023].

<sup>24</sup> Hayati, H, Eager, D and Walker, P (2019) *The effects of surface compliance on greyhound galloping dynamics*. Proceedings of the Institution of Mechanical Engineers, Part K: Journal of Multibody Dynamics 233, no. 4: pp. 1033-1043.

<sup>25</sup> O'Neill, D.G., Rooney, NJ, Brock, C., Church, DB, Brodbelt, DC, Pegram, C. (2019) *Greyhounds under general veterinary care in the UK during 2016: demography and common disorders*. Canine Genetics and Epidemiology 6, 4.

Note: The data is available in more detail on the GBGB website<sup>26</sup>.

### Injuries and Fatalities in Scotland

In 2018-2020, the previously operational GBGB-licensed Shawfield Stadium reported a total of 197 injuries and 15 fatalities (see Table 3)<sup>27</sup>.

**Table 3. Number of Injuries and Fatalities at Shawfield Stadium**

	2018	2019	2020
Total Number of Runs	5,620	5,597	813
Total Number of Injuries	45	70	12
Injuries as % of total runs	0.80	1.25	1.48
Total Number of Fatalities	2	5	0
Fatalities as % of total runs	0.04	0.09	0.00

Note: The significant reduction in the total number of runs, injuries, and fatalities in 2020 was due to the closure of the racetrack in March 2020 as a result of the pandemic.

The rate of injuries, as percentage of total runs, at Shawfield Stadium nearly doubled in 2020 (1.48%) compared to 2018 (0.80%). In 2018, the rate of injuries at Shawfield Stadium (0.80%) was lower than the average rate of injuries at licensed racetracks in Great Britain (1.16%). However, the rate of injuries in 2019 (1.25%) and 2020 (1.48%) was higher than the average rate of injuries in Great Britain for those years (1.21% and 1.12% respectively) (see Table 1).

The number of fatalities at Shawfield Stadium saw an increase in 2019 and a decrease to zero in 2020. The rate of fatalities, as percentage of total runs, at Shawfield Stadium in 2018 (0.04%) and 2020 (0%) was lower than the average rate of fatalities at licensed racetracks in Great Britain for those years (0.06% and 0.06% respectively). However, in 2019 the rate of fatalities, as percentage of total runs, at Shawfield Stadium (0.09%) was higher than the average rate of fatalities at licensed racetracks in Great Britain for that year (0.05%) (see Table 1).

There is no requirement for unlicensed racetracks to record injuries and fatalities and report these to a licensed authority or governing body, and subsequently there are no available data on the number of injuries and fatalities at the unlicensed Thornton Greyhound Stadium in Fife. However, in its investigative report, the SAWC

<sup>26</sup> GBGB (2023) *Annual Injury and Retirement Data*. GBGB. Available from: <https://www.gbgb.org.uk/welfare-care/injury-and-retirement-data/> [Accessed on 22 November 2023].

<sup>27</sup> OneKind (2023) *Submission in support of petition PE 01758*. Scottish Parliament. Available from: <https://www.parliament.scot/-/media/files/committees/rural-affairs-islands-and-natural-environment-committee/correspondence/2022/petition-pe1758-onekind-submission-in-support-of-petition.pdf> [Accessed on 22 November 2023].

concluded that it had “no reason to believe that the risks [of injury and fatality] are any different/lesser [at the unlicensed racetrack] in Scotland from elsewhere in the UK” (p. 14)<sup>28</sup>. That is because all racetracks in the UK, whether licensed or unlicensed, have a similar racetrack design which leads to a high risk of collision and stress damage in dogs (see *Section 1.2.1. Racetracks* for more information).

## Other Animal Welfare Concerns

The Member recognises that there are broader animal welfare concerns relating to the use of greyhounds in racing concerning their whole life cycle, beyond injuries and fatalities at racetracks. The proposal for a Bill will have consequential effects on these associated welfare concerns across the life cycle of greyhounds.

A number of these animal welfare concerns are listed here for information:

- Euthanasia – By definition, euthanasia is described as “painless killing to relieve suffering”<sup>29</sup>, however the table below (Table 4) illustrates that a total number of 675 ex-racing dogs were euthanised due to reasons outwith suffering including “treatment costs”, “no home found”, and “designated unsuitable for homing” within the five-year period of 2018-2022.

**Table 4. Number of Registered Racing Dogs Euthanised at GBGB Racetracks between 2018-2022**

	2018	2019	2020	2021	2022
<b>Total Number of Ex-racing Dogs</b>	7,705	7,170	7,500	6,373	5,395
<b>Total Number of Euthanised Ex-racing Dogs</b>	370	206	47	22	30
<b>Euthanised Ex-racing Dogs as % of Total Number of Ex-racing Dogs</b>	4.9	2.8	0.6	0.3	0.6

<sup>28</sup> Scottish Animal Welfare Commission (SAWC) (2023) *Report on the welfare of greyhounds used for racing in Scotland* (2023). Scottish Government. Available at: <https://www.gov.scot/publications/report-welfare-greyhounds-used-racing-scotland-scottish-animal-welfare-commission/> [Accessed on 22 November 2023].

<sup>29</sup> Royal College of Veterinary Surgeons (2023) *Euthanasia of animals*. Royal College of Veterinary Surgeons. Available from: <https://www.rcvs.org.uk/setting-standards/advice-and-guidance/code-of-professional-conduct-for-veterinary-surgeons/supporting-guidance/euthanasia-of-animals/> [Accessed 22 November 2023].



Note: The data excludes dogs that experienced “sudden death”, “put to sleep on veterinary advice” or “terminal illness, natural causes, other”. The data is available in more detail on the GBGB website<sup>30</sup>.

- The rate of euthanised ex-racing dogs, as percentage of total number of ex-racing dogs, in 2022 (0.06%) decreased significantly since 2018 (4.9%). In 2019, the GBGB made a commitment to halve the number of dogs euthanised due to “treatment costs” or “no home found” within three years. However, it should be noted that despite the overall decrease in the five-year period, the rate of euthanised dogs due to the reasons noted doubled between 2021 (0.03%) and 2022 (0.06%). According to GBGB, no greyhounds were euthanised because no home could be found for them between 2019 and 2022<sup>31</sup>.
- Overbreeding – The report by SAWC estimated that more than 85% of greyhounds in the UK are bred in Ireland, with a lack of information regarding the conditions in which puppies are bred, reared, and transported to Great Britain. The registration of greyhound puppies in Ireland is through voluntary self-reporting via the Irish Coursing Club. There is a significant discrepancy between the number of dogs bred and registered in Ireland, and the number of dogs used in racing in Ireland and the UK. In 2021, there were 12,960 Irish-bred puppies registered at the time of birth, yet approximately 10% were not registered at 12 months of age – meaning that over 1,000 puppies were unaccounted for. In Great Britain similar patterns were seen with around 13% fewer dogs being registered to race under GBGB compared with numbers of puppies registered on the Greyhound Stud Book.
- Doping – There have been reports of performance-enhancing banned substances found in dogs used in racing at racetracks in Scotland and the UK<sup>32,33</sup>. The GBGB has an anti-doping policy in place and the availability of data relies either on random sampling or on trainers and owners self-reporting<sup>34</sup>. The total number of doping samples collected (7,182) as percentage of the total number of races completed (359,083) at GBGB racetracks was only 2% in 2021<sup>35</sup>. The testing for substances in greyhounds

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<sup>30</sup> GBGB (2023) *Annual Injury and Retirement Data*. GBGB. Available from: <https://www.gbgb.org.uk/welfare-care/injury-and-retirement-data/> [Accessed on 22 November 2023].

<sup>31</sup> GBGB (2023) *Annual Injury and Retirement Data*. GBGB. Available from: <https://www.gbgb.org.uk/welfare-care/injury-and-retirement-data/> [Accessed on 22 November 2023].

<sup>32</sup> Scottish SPCA (2022) *Scottish SPCA submission relating to petition PE1758: End greyhound racing in Scotland*. Scottish Parliament. Available from: <https://www.parliament.scot/-/media/files/committees/rural-affairs-islands-and-natural-environment-committee/correspondence/2022/petition-pe1758-submission-from-scottish-sPCA-13-april-2022.pdf> [Accessed 23 November 2023].

<sup>33</sup> The Ferret (2019) *Dozens of greyhounds racing in Scotland test positive for banned substances such as cocaine*. The Ferret. Available from: <https://theferret.scot/greyhounds-racing-shawfield-cocaine/> [Accessed on 22 November 2023].

<sup>34</sup> GBGB (2023) *Rules of Racing*. GBGB. Available from: <https://rules.gbgb.org.uk/section-8-inquiries-tests-samples-disciplinary-powers-consequences/rule-173-examinations-tests-samples-procedure/> [Accessed on 22 November 2023].

<sup>35</sup> GBGB (2022) *Annual Report & Accounts 2021*. GBGB. Available from: [https://gbgb-prod-assets.s3.eu-west-1.amazonaws.com/wp-content/uploads/2023/03/20123715/22224\\_GBGB-2021-Report-web-update.pdf](https://gbgb-prod-assets.s3.eu-west-1.amazonaws.com/wp-content/uploads/2023/03/20123715/22224_GBGB-2021-Report-web-update.pdf) [Accessed on 22 November 2023].

used in racing only occurs at licensed racetracks, with no requirement for unlicensed racetracks to perform doping tests.

- Kennelling – Dogs used in racing spend up to 95% of their times in kennels, which impacts on their quality of life<sup>36</sup>. While GBGB guidance is in place to ensure that the physical needs of dogs are met, an investigative report into licensed trainers' kennels by the Dogs Trust discovered that in some cases these standards have not sufficiently been met<sup>37</sup>. There is less information available regarding how dogs racing at unlicensed tracks are kept, as some dogs may live with their owners or trainers.

There are further animal welfare concerns relating specifically to unlicensed racetracks, including the lack of on-site veterinary presence, which puts dogs at risk of unnecessary suffering when injured as prompt veterinary care is not available<sup>38</sup>.

## Recent Parliamentary Activity in Scotland

Scotland Against Greyhound Exploitation (SAGE) lodged petition PE1758: End Greyhound Racing in Scotland<sup>39</sup> currently being considered by the Rural Affairs and Islands Committee (RAIC) of the Scottish Parliament. In January 2024, the petition is the most signed in the history of the Scottish Parliament with over 28,450 signatures. There were two similar petitions lodged at UK Parliament and Senedd Cymru calling for a ban on greyhound racing:

- e-petition 554073: Ban greyhound racing to end unnecessary deaths & suffering of racing dogs<sup>40</sup> (England), which surpassed its target (100,000 signatures) with a total of 104,886 signatures.
- P-06-1253: Ban greyhound racing in Wales<sup>41</sup> (Wales), which surpassed its target (10,000 signatures) with a total of 35,101 signatures.

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<sup>36</sup> Environment, Food and Rural Affairs Committee (2016) *Second Report of the Environment, Food and Rural Affairs Committee of Session 2015-16: Greyhound Welfare*. House of Commons, London, UK. Available from: <https://parliament.uk/globalassets/documents/commons-committees/environment-food-rural-affairs/2nd-Report-Greyhound-welfare.pdf> [Accessed 22 November 2023].

<sup>37</sup> Dogs Trust (2015) Report available upon request.

<sup>38</sup> Scottish Animal Welfare Commission (SAWC) (2023) *Report on the welfare of greyhounds used for racing in Scotland* (2023). Scottish Government. Available at: <https://www.gov.scot/publications/report-welfare-greyhounds-used-racing-scotland-scottish-animal-welfare-commission/> [Accessed on 22 November 2023].

<sup>39</sup> Scottish Parliament (2023) *PE1758: End Greyhound Racing in Scotland*. Scottish Parliament. Available from: <https://www.parliament.scot/get-involved/petitions/view-petitions/pe1758-end-greyhound-racing-in-scotland> [Accessed on 22 November 2023].

<sup>40</sup> UK Parliament (2023) *e-petition 554073: Ban greyhound racing to end unnecessary deaths & suffering of racing dogs*. UK Parliament. Available from: <https://petition.parliament.uk/petitions/554073> [Accessed on 22 November 2023].

<sup>41</sup> Senedd Cymru (2023) *P-06-1253: Ban greyhound racing in Wales* (2023). Senedd Cymru. Available at: <https://petitions.senedd.wales/petitions/244932> [Accessed on 22 November 2023].

The Member lodged motion S6M-05949 on Greyhound Racing in Scotland<sup>42</sup>, which achieved cross-party support from MSPs and was debated on 06 October 2022<sup>43</sup>. During the Members' Business Debate, the Scottish Government committed to including the licensing of greyhound racing in its consultation on the *Licensing of activities involving animals*<sup>44</sup>.

The publication of the Scottish Animal Welfare Commission's (SAWC) report on the welfare of greyhounds used for racing<sup>45</sup> published on 28 February 2023, prompted an inquiry by the Rural Affairs and Islands Committee (RAIC) in the Scottish Parliament seeking further evidence from key stakeholders to determine next steps with the petition PE1758. The committee held three evidence sessions:

- SAWC on 29 March 2023<sup>46</sup>
- GBGB and Thornton Greyhound Stadium on 26 April 2023<sup>47</sup>
- Dogs Trust, RSPCA, ND Scottish SPCA on 03 May 2023<sup>48</sup>

The RAIC also opened a public Call for Views<sup>49</sup>, which opened on 17 March 2023 and closed on 07 April 2023. The evidence sessions and written evidence is available at the petition's page on the Scottish Parliament website<sup>50</sup>. Several written and oral parliamentary questions have been asked about greyhound racing, which are available to view on the Questions and Answers page of the Scottish Parliament website<sup>51</sup>.

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<sup>42</sup> Scottish Parliament (2022) S6M-05949: *Greyhound Racing in Scotland*. Available at: <https://www.parliament.scot/chamber-and-committees/votes-and-motions/S6M-05949>. [Accessed on 22 November 2023].

<sup>43</sup> Scottish Parliament (2022) *Members' Business – S6M-05949 Mark Ruskell: Greyhound Racing in Scotland*. Scottish Parliament TV. Available at: <https://www.scottishparliament.tv/meeting/members-business-s6m-05949-mark-ruskell-greyhound-racing-in-scotland-october-6-2022>. [Accessed on 22 November 2023]

<sup>44</sup> Scottish Government (2023) *Licensing of activities involving animals*. Scottish Government. Available at: <https://consult.gov.scot/agriculture-and-rural-economy/licensing-of-activities-involving-animals/> Accessed on 22 November 2023].

<sup>45</sup> Scottish Animal Welfare Commission (SAWC) (2023) *Report on the welfare of greyhounds used for racing in Scotland* (2023). Scottish Government. Available at: <https://www.gov.scot/publications/report-welfare-greyhounds-used-racing-scotland-scottish-animal-welfare-commission/> [Accessed on 22 November 2023].

<sup>46</sup> Scottish Parliament (2023) *Rural Affairs and Islands Committee: 10<sup>th</sup> Meeting*. Scottish Parliament. Available at: <https://www.parliament.scot/chamber-and-committees/committees/current-and-previous-committees/session-6-rural-affairs-and-islands-committee/meetings/2023/rais62310> [Accessed on 22 November 2023].

<sup>47</sup> Scottish Parliament (2023) *Rural Affairs and Islands Committee: 12<sup>th</sup> Meeting*. Scottish Parliament. Available at: <https://www.parliament.scot/chamber-and-committees/committees/current-and-previous-committees/session-6-rural-affairs-and-islands-committee/meetings/2023/rais62312> [Accessed on 22 November 2023].

<sup>48</sup> Scottish Parliament (2023) *Rural Affairs and Islands Committee: 13<sup>th</sup> Meeting*. Scottish Parliament. Available at: <https://www.parliament.scot/chamber-and-committees/committees/current-and-previous-committees/session-6-rural-affairs-and-islands-committee/meetings/2023/rais62313> [Accessed on 22 November 2023].

<sup>49</sup> Scottish Parliament (2023) *Call for Views: Petition PE1758: End greyhound racing in Scotland*. Scottish Parliament. Available at: <https://yourviews.parliament.scot/raine/petition-pe1758/> [Accessed on 22 November 2023].

<sup>50</sup> Scottish Parliament (2023) *PE1758: End greyhound racing in Scotland*. Scottish Parliament. Available at: <https://www.parliament.scot/get-involved/petitions/view-petitions/pe1758-end-greyhound-racing-in-scotland> [Accessed on 22 November 2023].

<sup>51</sup> Scottish Parliament (2023) *Questions and Answers*. Scottish Parliament. Available at: <https://www.parliament.scot/chamber-and-committees/questions-and-answers> [Accessed on 22 November 2023].

## Views on greyhound racing

This section summarises the views of animal welfare organisations, the industry, and general public on the use of greyhounds in racing.

## Views of animal welfare organisations

The key animal welfare organisations in Scotland, the rest of the UK, and internationally, have shared their positions on greyhound racing.

- In written evidence to the RAIC, the SAWC called for an end to unlicensed racetracks in Scotland on 23 May 2022<sup>52</sup>. In their report, published on 28 February 2023, the commission noted that an end to greyhound racing would be “desirable” and listed recommendations for the Scottish Government<sup>53</sup>.
- The Scottish SPCA called for a phase out of both licensed and unlicensed racetracks in Scotland. In written evidence to the RAIC, the organisation committed to care for any stud, breeding female, pregnant mum or mum and suckling pups until they are ready to be homed<sup>54</sup>.
- The Dogs Trust, RSPCA, and Blue Cross published a news release in September 2022 calling for a phased end to greyhound racing in Wales.<sup>55</sup> These organisations later launched the #CutTheChase campaign for England and Wales. These organisations previously worked with GBGB through the Greyhound Forum to bring forward improvements in the welfare of racing greyhounds. However, they resigned from the forum in May 2023 due to what they saw as inadequate action and commitment from the industry to improve welfare standards at licensed racetracks.
- In June 2023, nine animal welfare organisations joined together to launch the Unbound the Greyhound coalition campaign, calling for a phase out of dog racing in Scotland. Their open letter to the Scottish Government has gathered more than 22,500 signatures<sup>56</sup>. The coalition consists of OneKind, All-Party Parliamentary Dog Advisory Welfare Group (APDAWG), Animal Concern, Edinburgh Dog and Cat Home, GREY2K USA Worldwide, Hope Rescue, League Against Cruel Sports Scotland, Say No to Greyhound Racing in Scotland, and Scotland Against Greyhound Exploitation (SAGE).

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<sup>52</sup> SAWC (2022) *Letter to the Convener of RAIC*. Scottish Parliament. Available from:

<https://www.parliament.scot/chamber-and-committees/committees/current-and-previous-committees/session-6-rural-affairs-and-islands-committee/correspondence/2022/petition-pe1758--scottish-animal-welfare-commission-to-the-convener-23-may-2022> [Accessed 23 November 2023].

<sup>53</sup> Scottish Animal Welfare Commission (SAWC) (2023) *Report on the welfare of greyhounds used for racing in Scotland* (2023). Scottish Government. Available at: <https://www.gov.scot/publications/report-welfare-greyhounds-used-racing-scotland-scottish-animal-welfare-commission/> [Accessed on 22 November 2023].

<sup>54</sup> Scottish SPCA (2022) *Scottish SPCA submission relating to petition PE1758: End greyhound racing in Scotland*. Scottish Parliament. Available from: <https://www.parliament.scot/-/media/files/committees/rural-affairs-islands-and-natural-environment-committee/correspondence/2022/petition-pe1758-submission-from-scottish-sPCA-13-april-2022.pdf> [Accessed 23 November 2023].

<sup>55</sup> Dogs Trust, RSPCA, and Blue Cross (2022) *Cut the chase: We can end Greyhound racing for good*. Dogs Trust. Available from: <https://www.dogstrust.org.uk/about-us/what-we-do/our-views/cut-the-chase> [Accessed 22 November 2023].

<sup>56</sup> Unbound the Greyhound (2023) *Open Letter*. OneKind. Available from: <https://secure.onekind.org/page/128339/petition/1> [Accessed 23 November 2023].



There are some organisations with a membership at The Greyhound Forum without a clear public position on this issue, including The Kennel Club and The Greyhound Trust.

## Views of the industry

The GBGB believes that “through the Greyhound Commitment, significant improvements have been achieved in recent years” and that its long-term strategy, *A Good Life for Every Greyhound*<sup>57</sup>, would “drive welfare standards forward and safeguard the health and wellbeing of greyhounds at every stage of their lives”<sup>58</sup>. In written evidence to RAIC, the GBGB shared that “the highest welfare standards underpin our sport [greyhound racing] and independently verified data shows transformative improvements over the past few years”<sup>59</sup> and it responded to animal welfare concerns raised by SAWC in its report<sup>60</sup>.

## Views of the general public

A survey commissioned by the non-profit organisation GREY2K USA Worldwide<sup>61</sup> conducted by an independent polling organisation, PanelBase, surveyed members of the general public in Scotland on their views on greyhound racing. The key findings from the survey include that 63% of those surveyed have an unfavourable view of greyhound racing and 58% of Scots believe greyhounds bred for racing have a poor quality of life. In addition, more than twice as many people said they would vote in favour of ending greyhound racing than opposed it. The evidence suggests that, although greyhound racing is highly valued by a small segment of the population (7% of respondents were very positive about greyhound racing), there is little wider public appeal.

The outcome of the RAIC’s Call for View<sup>62</sup>, also illustrated widespread public support for an end to greyhound racing in Scotland. The Committee received 1,314 responses in total: 32 from organisations and 1,284 from individuals. A total of 530

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<sup>57</sup> GBGB (2022) *A Good Life for Every Greyhound*. GBGB. Available from: <https://www.gbgb.org.uk/welfare-care/commitment-to-care/> [Accessed on 22 November 2023].

<sup>58</sup> GBGB (2022) *A Good Life for Every Greyhound: GBGB Launches New Long-term Welfare Strategy*. GBGB. Available from: <https://www.gbgb.org.uk/agoodlifeforeverygreyhound/> [Accessed on 22 November 2023].

<sup>59</sup> GBGB (2022) *Greyhound Racing in Scotland: RAINE Committee*. Scottish Parliament. Available from: <https://www.parliament.scot/-/media/files/committees/rural-affairs-islands-and-natural-environment-committee/correspondence/2022/petition-greyhound-racing-in-scotland-3-november-2022.pdf> [Accessed on 22 November 2023].

<sup>60</sup> GBGB (2023) *Response to the Scottish Animal Welfare Commission’s ‘Report on the welfare of greyhounds used for racing in Scotland. Scottish Parliament’*. Available from: <https://www.parliament.scot/-/media/files/committees/rural-affairs-and-islands-committee/correspondence/2023/petition-pe1758-gbgb-response-6-april-2023.pdf> [Accessed on 22 November 2023].

<sup>61</sup> GREY2K USA Worldwide (2023) *Letter from GREY2K USA Worldwide to the Convener*. Rural Affairs and Islands Committee, Scottish Parliament. Available at: <https://www.parliament.scot/-/media/files/committees/rural-affairs-islands-and-natural-environment-committee/correspondence/2023/petition-pe1758-grey-2k-usa-worldwide-letter-16-january-2023.pdf> [Accessed 23 November 2023].

<sup>62</sup> Scottish Parliament (2023) *Call for Views: Petition PE1758: End greyhound racing in Scotland*. Scottish Parliament. Available at: <https://yourviews.parliament.scot/raine/petition-pe1758/> [Accessed on 22 November 2023].

responses were from respondents based in Scotland, and 91.7% of respondents were in favour of a ban on greyhound racing<sup>63</sup>.

## Existing Law

This section sets out the current law in relation to the welfare of greyhounds used for racing in Scotland, the rest of the UK, and internationally. The section also sets out reasons why the current legislative frameworks are insufficient in tackling the inherent risks of injury and fatality associated with using greyhounds in racing and highlights the case for new legislation.

## Law in Scotland

There is no specific regulation in place for the welfare of greyhounds used for racing in Scotland, but their welfare falls under the scope of the following, wider legislation: The provisions of Part 2 of the Animal Health and Welfare (Scotland) Act 2006<sup>64</sup> apply to all people responsible for animals, including breeders, trainers, and owners of racing greyhounds and those in charge of animals for rescue or re-homing. For example:

- Under section 19(2) it is an offence if the person responsible causes an animal unnecessary suffering by an act or omission **and** the person knew, or ought to reasonably have known that the act or omission would have caused the suffering or be likely to do so (i.e. suggests intent). The commission of the offence requires both (a) and (b) to be satisfied.
- Section 19(3) makes it an offence if a person permits another person to cause an animal unnecessary suffering by an act or omission and the person permitting that to happen failed to take such steps as are reasonable in the circumstances to prevent that happening
- Section 22 makes it an offence to, without lawful authority or reasonable excuse, administer a poisonous or injurious drug or substance to a protected animal, or to cause such a drug or substance to be taken by a protected animal. The offence requires that the accused have known the drug or substance to be poisonous or injurious. It is also an offence for a person responsible for a protected animal to permit another person to administer such a drug or substance to the animal, or to cause it to be taken by the animal. For a person responsible for an animal to administer a poisonous or injurious drug or substance to the animal, or to cause such a drug or substance to be taken by the animal.

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<sup>63</sup> Scottish Parliament (2023) *Summary of Call for Views: Petition PE1758: End greyhound racing in Scotland*. Scottish Parliament. Available at: <https://www.parliament.scot/~media/committ/5677> [Accessed on 22 November 2023].

<sup>64</sup> Scottish Government (2006) *Animal Health and Welfare (Scotland) Act 2006*. Scottish Government. Available from: <https://www.legislation.gov.uk/asp/2006/11/contents> [Accessed on 22 November 2023].

- Section 24 makes it an offence if the person responsible for animals does not take such reasonable steps in the circumstances to ensure that the needs of these animals are met to the extent required by good practice. These needs include<sup>65</sup>:
  - The need for a suitable environment;
  - The need for a suitable diet;
  - The need for the animals to exhibit normal behavioural patterns;
  - Any need for the animals to be housed with, or apart from, other animals;
  - The need for protection from suffering, injury and disease.

A person convicted under section 19 may be imprisoned for a maximum period of 5 years 12 months and/or fined. A person convicted under sections 22 or 24 can be imprisoned for up to 6 months and fined up to level 5 on the standard scale- the maximum is currently £5,000<sup>66</sup>.

The Scottish Government issued a **Code of Practice for the Welfare of Dogs**<sup>67</sup>, which shares best practice guidance focused on Section 24 of the Animal Health and Welfare (Scotland) Act 2006.

The Scottish Government launched a consultation into the **Licensing of activities involving animals**<sup>68</sup>, which sought views on proposals to licence greyhound racing in Scotland. Whilst not exhaustive the Scottish Government proposed that a future licensing scheme covering greyhound racing would —

- Require the operator of a greyhound track to be licensed by the licensing authority (this would likely be the relevant local authority).
- Allow inspectors appointed by the licensing authority to inspect licensed premises or to enter premises suspected of operating without a licence.
- Require any licence holder to comply with the conditions of any licence granted by the licensing authority. As is already the case for animal related activities subject to licensing in Scotland, the conditions that would need to be complied with would be set out in legislation. The licensing authority would have powers to add additional conditions of licence, but only where it considers it necessary to ensure the welfare of animals. Licence conditions could include:
  - Requiring licence holders to ensure the presence of a veterinary surgeon during racing to allow racing greyhounds to be health checked by the vet before and after racing.

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<sup>65</sup> [Animal Health and Welfare \(Scotland\) Act 2006 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

<sup>66</sup> Scottish Government (2006) *Animal Health and Welfare (Scotland) Act 2006*. Scottish Government. Available from: <https://www.legislation.gov.uk/asp/2006/11/contents> [Accessed on 22 November 2023].

<sup>67</sup> Scottish Government (2010) *Welfare of dogs: code of practice*. Scottish Government. Available from: <https://www.gov.scot/publications/code-practice-welfare-dogs/> [Accessed on 22 November 2023].

<sup>68</sup> Scottish Government (2023) *Licensing of activities involving animals*. Scottish Government. Available from: <https://consult.gov.scot/agriculture-and-rural-economy/licensing-of-activities-involving-animals/> [Accessed on 22 November 2023].

- Requiring the provision of a suitably equipped examination room to be used by veterinarians for the inspection, testing and emergency treatment of racing dogs.
  - Requiring licence holders to ensure the provision of adequate kennelling at the licensed premises that protects racing dogs from temperature extremes and weather.
  - Requiring licence holders to record and publish key data linked to fatalities and injuries attributed to racing.
- Require the licensing authority to be satisfied that the licence conditions are likely to be met and that grant of a licence is otherwise appropriate before issuing a licence. This would involve considering the applicant's conduct, whether the applicant is a fit and proper person and other relevant circumstances. This is already a requirement for licensable activities under the existing licensing framework.
  - Require licence holders to refuse entry to greyhound owners/trainers that have failed to transport dogs in a manner that ensures their safety, or, where it is clear that the dogs are not fit to race, refuse to permit any such dog to race.
  - Require licence holders to put in place protocols to deter the administration of performance enhancing substances and to undertake random testing of racing dogs for such substances.
  - Allow the licensing authority to charge a fee for the consideration of a licence application and grant of licence.
  - Allow the licensing authority to vary, suspend or revoke a licence as appropriate due to the actions or conduct of a licence holder.
  - Require the licensing authority to publish online a register of licence holders. This is to allow the public to quickly check whether an operator of a track is properly licensed.
  - Provide an appeals mechanism for applicants or licence holders aggrieved by a decision by the licensing authority.

The Scottish Government is currently analysing and considering responses to the consultation. The consultation paper proposes the introduction of a statutory licensing scheme for greyhound racing in Scotland to improve the welfare standards of unlicensed racetracks, including requiring the recording and reporting of key data and ensuring accountability for compromises to welfare. A consultation summary report will be published which will include an anonymised analysis of the responses received and set out the next steps.

At present, the activity of racing greyhounds continues to take place without a statutory licensing framework. It is anticipated that any new licensing requirements would be



introduced through the same framework as used in the **Animal Welfare (Licensing of Activities Involving Animals) (Scotland) Regulations 2021**<sup>69</sup>.

Other wider legislation that applies to greyhounds used for racing includes: The Welfare of Animals (Transport) (Scotland) Regulations 2006<sup>70</sup> to ensure the welfare for transported animals, and The Microchipping of Dogs (Scotland) Regulations 2016<sup>71</sup> to ensure that all dogs in Scotland are microchipped. The proposed Welfare of Dogs (Scotland) Bill<sup>72</sup> introduced by Christine Grahame MSP to improve the health and wellbeing of dogs throughout their lives, including by regulating the selling or transferring of puppies from unlicensed litters, would apply to all dogs, including greyhounds.

## Law in the rest of the UK

The Welfare of Racing Greyhounds Regulations 2010 (“the 2010 Regulations”)<sup>73</sup> apply in England. These require greyhound racetracks to be licensed and impose various licence conditions on the operators of greyhound tracks. The licence conditions require a veterinary surgeon to be present at tracks before and during racing with the responsibility of inspecting all the dogs that are intended to race. The licence conditions also cover the standard of kennel facilities at a track, record keeping, and traceability.

Under the 2010 Regulations greyhound tracks can be licensed by the local authorities or by a UKAS accredited body. As a UKAS accredited body, the GBGB is responsible for the licensing of greyhound racetracks in England that operate to the standards required under the 2010 Regulations and that meet the higher standards set under the GBGB’s Rules of Racing<sup>74</sup>. Independent tracks that do not meet the standards set by the GBGB are licensed by the local authority.

## The case for new legislation

The Animal Health and Welfare (Scotland) Act 2006 contains provisions which protect all dogs across their whole lifecycle. As previously mentioned, the Act protects dogs from a range of welfare issues, including: unnecessary suffering, failure to seek veterinary treatment, and the administration of poisonous or injurious

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<sup>69</sup> Scottish Government (2021) *The Animal Welfare (Licensing of Activities Involving Animals) (Scotland) Regulations 2021*. Scottish Government. Available at: <https://www.legislation.gov.uk/ssi/2021/84/contents/made> [Accessed on 22 November 2023].

<sup>70</sup> Scottish Government (2006) *The Welfare of Animals (Transport) (Scotland) Regulations 2006*. Scottish Government. Available at: <https://www.legislation.gov.uk/ssi/2006/606/contents/made> [Accessed on 22 November 2023].

<sup>71</sup> Scottish Government (2015) *The Microchipping of Dogs (Scotland) Regulations 2016*. Scottish Government. Available at: <https://www.legislation.gov.uk/sdsi/2016/9780111030127> [Accessed on 22 November 2023].

<sup>72</sup> Scottish Parliament (2023) *Proposed Welfare of Dogs (Scotland) Bill*. Scottish Parliament. Available at: <https://www.legislation.gov.uk/ssi/2021/84/contents/made> [Accessed on 22 November 2023].

<sup>73</sup> UK Government (2021) *The Welfare of Racing Greyhounds Regulations 2010* (2010). UK Government. Available at: <https://www.legislation.gov.uk/ukdsi/2010/9780111489727> [Accessed on 22 November 2023].

<sup>74</sup> GBGB (2023) *Rules of Racing*. GBGB. Available from: <https://www.gbgb.org.uk/rules-regulation/rules-of-racing/> [Accessed 22 November 2023].

drugs. The legislation places responsibility on the person caring for a dog, and in the case of a dog used for racing, this would be the trainer or owner.

In Scotland, greyhound racing (licensed and unlicensed) is lawful, and injuries and fatalities are accepted as a consequence of this activity. For this reason, it becomes challenging to establish beyond reasonable doubt that any suffering (i.e., injury and fatality) experienced by a greyhound while lawfully racing was "unnecessary" under the Animal Health & Welfare (Scotland) Act 2006 <sup>75</sup>.

Whilst the Animal Health and Welfare (Scotland) Act 2006 affords protection to all dogs across a number of welfare concerns, it does not include specific provisions for greyhounds used in racing. Accordingly, the provisions of the Act do not address the specific risk of injury and fatality which arise as a result of greyhound racing.

Despite progress toward improving welfare standards at licensed racetracks across Great Britain, the statistics available illustrate that as long as greyhounds are used in racing they will continue to suffer from inherent risks of injury and fatality associated with racing. The proposed Prohibition of Greyhound Racing (Scotland) Bill would prohibit the use of greyhounds in racing in order to protect greyhounds from these inherent harms.

## Detail of the Proposed Bill

### Aim of the Bill

To tackle the inherent risks of injury and fatality experienced by greyhounds used for racing in Scotland, the proposed Prohibition of Greyhound Racing (Scotland) Bill aims to prohibit the use of greyhounds in racing. The proposed Bill aims to achieve this through the following legislative measure:

- The creation of a criminal offence for a person to use or permit the usage of greyhounds in racing at (licensed and unlicensed) racetracks for commercial and non-commercial purposes in Scotland, and the creation of provisions for enforcement of that offence.

Further information on the proposed above mentioned offence and penalties is available below. The Member seeks respondents' views on all aspects of the proposed Bill.

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<sup>75</sup> Scottish Parliament (2023) Rural Affairs and Islands Committee: 13th Meeting. Scottish Parliament. Available at: [Rural Affairs and Islands Committee 13th Meeting, 2023 | Scottish Parliament Website](#)

## Offences and penalties

As set out above, there is in existing statute a criminal offence under Section 19 of the Animal Health and Welfare (Scotland) Act 2006<sup>76</sup>, which considers a person committing an offence if:

- a) the person causes a protected animal unnecessary suffering by an act, and
- b) the person knew, or ought reasonably to have known, that the act would have caused the suffering or be likely to do so.

The penalties for offences under Section 19 are set out in Section 46 of the Act, as follows:

- a) on summary conviction, to imprisonment for a term not exceeding 12 months or a fine not exceeding £20,000 (or both),
- b) on conviction on indictment, to imprisonment for a term not exceeding 5 years or a fine (or both).

The Member considers that penalties for a person committing an offence under the proposal for this Bill should be analogous in the level of seriousness to the penalties for a person committing an offence under Sections 19 and Section 24 of the Animal Health and Welfare (Scotland) Act 2006. Therefore, the proposal for the Bill recommends the following offences and penalties:

- That there be a criminal offence for using greyhounds for racing in Scotland.
- That the penalties for this criminal offence correspond with those in Part 2 of the Animal Health and Welfare (Scotland) Act 2006 as follows:
  - on summary conviction, to imprisonment of a term not exceeding 12 months or to a fine not exceeding the statutory maximum, or to both such imprisonment and such fine;
  - on conviction on indictment, to imprisonment for a term not exceeding 5 years or to a fine, or both such imprisonment and such fine.

## Implementation

It is proposed that the Bill, if passed, will come into force after a period of 12 months. During this period, it is envisaged that operators would produce a plan for winding down all activities relating to the usage of greyhounds in racing, and proactively inform owners and trainers using dogs in racing at their racetracks, as well as the public, of these plans. This period would also allow any owners and trainers who decide not to keep dogs in their care as companion animals to support the efforts of rescue and rehoming charities that are willing to care for and find suitable homes for greyhounds previously used in racing.

## Implications of the proposed Bill

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<sup>76</sup> Animal Health and Welfare (Scotland) Act 2006 (2006) Scottish Government. Available at: <https://www.legislation.gov.uk/asp/2006/11/contents> [Accessed on 22 November 2023]

## Impact on greyhound racing industry

The proposed Bill will impact the operators, trainers, attendees, and bookmakers of any operating racetrack involved in the use of greyhounds in racing for commercial or non-commercial purposes (e.g., loss of revenue and income). At present, there is only one greyhound racetrack in Scotland, which operates unlicensed. It was not possible to calculate the types of earnings and spending associated with operators, trainers, and owners of greyhounds used for racing in Scotland. However, potential sources of spending and income could include the following: stadium rental, dog feed, kennelling, bookmaker, local advertising, hiring of labour, food and drink, parking, and entry fees.

The proposed Bill may also impact trainers and operators across Great Britain who may have an interest in the use of greyhounds in racing in Scotland. For example, an interest in using their greyhounds for racing in operational racetracks, or an interest in developing and operating new racetracks for the purposes of greyhound racing.

The SAWC's *Report on the welfare of greyhounds used for racing in Scotland* acknowledged that some correspondents wrote to them about improvements in their mental health as a result of attending races at the unlicensed racetrack in Fife<sup>77</sup>. In its report, the SAWC noted that it "*could not clearly separate if the benefits accrued from having an opportunity to meet with and engage with others with similar interests, rather than deriving directly from seeing dogs racing, or being able to bet on the outcomes*" (p. 22). The SAWC further noted that "*almost everyone present during our visit to Thornton Stadium was either running a dog, and/or had been a trainer/raced dogs or were family members of people racing dogs. There did not appear to be anyone attending without a direct connection to dog racing*" (p. 23). The Member welcomes stakeholders' views on the ways the proposed Bill may affect those directly involved in using greyhounds in racing in Scotland.

## Impact on rescue and rehoming centres

The proposed Bill could impact rescue and rehoming centres tasked with finding suitable homes for greyhounds previously used in racing at operating racetracks in Scotland.

A number of rescue and rehoming centres based in Scotland, including the Dogs Trust<sup>78</sup> and Scottish SPCA<sup>79</sup>, have already indicated their willingness to care for and find suitable homes for greyhounds previously used in racing. There are also centres

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<sup>77</sup> Scottish Animal Welfare Commission (SAWC) (2023) *Report on the welfare of greyhounds used for racing in Scotland* (2023). Scottish Government. Available at: <https://www.gov.scot/publications/report-welfare-greyhounds-used-racing-scotland-scottish-animal-welfare-commission/> [Accessed on 22 November 2023].

<sup>78</sup> Dogs Trust, RSPCA, and Blue Cross (2022) *Petition PE1758: End greyhound racing in Scotland*. Scottish Parliament. Available at: <https://www.parliament.scot/chamber-and-committees/committees/current-and-previous-committees/session-6-rural-affairs-and-islands-committee/correspondence/2022/petition-pe1758--dogs-trust-rspca-and-blue-cross-27-sept-22> [Accessed 22 November 2023].

<sup>79</sup> Scottish SPCA (2022) *Petition PE1758: End greyhound racing in Scotland*. Scottish Parliament. Available at: <https://www.parliament.scot/chamber-and-committees/committees/current-and-previous-committees/session-6-rural-affairs-and-islands-committee/correspondence/2022/petition-pe1758-end-greyhound-racing-in-scotland-scottish-sPCA-submission-of-13-april-2022> [Accessed 22 November 2023].

dedicated to caring, fostering, and homing greyhounds previously used in racing, including Greyhound Trust, Scottish Greyhound Sanctuary, Tia Greyhound and Lurcher Rescue, Greyhound Rescue Fife, and others.

The Dogs Trust documented that in the period 2018-2022, it received 64 greyhounds previously used in racing in Scotland, and a total of 1,541 greyhounds across the UK and the Republic of Ireland<sup>80</sup>. The number of greyhounds received, broken down by country and handover type (i.e., received from greyhound trainer, another organisation, or individual), is illustrated in Table 5. The Dogs Trust also highlighted that greyhounds have been amongst their top 12 intake of dog breeds. In 2022, greyhounds used in racing made up 88% of total greyhound handovers.

**Table 5. Number of Greyhounds Received by Dogs Trust between 2018-2022**

	2018	2019	2020	2021	2022
<b>England</b>	210	172	274	171	147
<b>Scotland</b>	14	10	30	9	7
<b>Wales</b>	17	10	3	8	11
<b>N. Ireland</b>	50	57	86	150	92
<b>ROI</b>	4	1	7	0	1
<b>Total</b>	<b>295</b>	<b>250</b>	<b>400</b>	<b>338</b>	<b>258</b>
<b>Greyhound Trainer</b>	149	111	203	120	67
<b>Other Organisation</b>	98	92	173	183	132
<b>Individual Handover</b>	48	47	24	35	59

The GBGB offers funding to partnered rescue and rehoming centres through its Greyhound Retirement Scheme to support with costs associated with greyhounds used in racing at licensed racetracks in Great Britain<sup>81</sup>. The scheme provides £400 to partnered rescue and rehoming centres for each greyhound that finds a home. However, the Dogs Trust highlighted that veterinary costs to treat 14 injured greyhounds between November 2018 and April 2021 shows that veterinary treatment alone ranged between £690 – £4,800<sup>82</sup>. For injured dogs leaving the industry, the £400 is significantly lower than the likely cost required to treat and find homes for them.

<sup>80</sup> Scottish SPCA, Dogs Trust, and RSPCA (2023) *Petition PE1758: End greyhound racing in Scotland*. Scottish Parliament. Available at: <https://www.parliament.scot/chamber-and-committees/committees/current-and-previous-committees/session-6-rural-affairs-and-islands-committee/correspondence/2023/petition-pe1758-end-greyhound-racing-in-scotland-joint-letter-25-may-2023> [Accessed 22 November 2023].

<sup>81</sup> GBGB (2023) *Greyhound Retirement Scheme*. GBGB. Available from: <https://www.gbgb.org.uk/greyhound-retirement-scheme/> [Accessed on 30 November 2023].

<sup>82</sup> RAIC (2023) Official Report: Wednesday 03 May 2023. Scottish Parliament. Available from: <https://www.parliament.scot/api/sitecore/CustomMedia/OfficialReport?meetingId=15289> [Accessed on 30 November 2023].



## **Impact on investigatory and enforcement bodies**

The proposed Bill involves engagement from public bodies, including Scottish SPCA and Police Scotland, who would be investigating and reporting any alleged offences. Offences may be reported to the Crown Office and Procurator Fiscal Service (COPFS) which will consider the evidence and decide next steps, including whether to proceed with a case through the appropriate criminal court.

## **Resource Implications**

The proposed Bill would introduce a new criminal offence. Scotland already has a large number of existing animal welfare offences. This means that structures are in place for the investigation and prosecution of crime relating to animal welfare.

Depending on the approach taken to investigating the criminal offence there may be resource implications for Scottish SPCA, Police Scotland, and the COPFS. There may also be costs associated with the hearing of cases by Scottish Courts and Tribunals Service and the costs of implementing custodial sentences. Taking into consideration that greyhound racing is not widespread as there is currently only one operational greyhound racetrack in Scotland numbers of prosecutions are predicted to be relatively low.

Should the Scottish Government and related services provide resources and public information to raise awareness of the legislation, as would be expected, there would be cost implications.

Additional training and support for SSPCA officers, lawyers, and others may also require additional resources to help support the implementation of the proposed Bill and transition to any new arrangements.

As outlined above it is expected that a short-term impact, of the proposal would be an increase in the number of greyhounds requiring to be rescued and/or rehomed by animal welfare organisations. These services are primarily provided by third sector organisations/charities who may have an increase in costs as a result of the proposal.

## **Equalities Implications**

The Bill is not expected to affect characteristics protected in law by the [Equality Act 2010](#).

## **Sustainability**

In making an initial assessment of the sustainable development elements of the draft proposal, a number of relevant principles have been considered, including:

- living within environmental limits
- ensuring a strong, healthy and just society
- achieving a sustainable economy

- promoting effective, participative systems of governance
- ensuring policy is developed on the basis of strong scientific evidence

Greyhound racing has been in decline across Scotland for some time. The proposal reflects the views of many in Scottish society.

The proposal for a new offence prohibiting greyhound racing in Scotland could have a positive impact on people and contribute towards a strong, healthy and just society by promoting the welfare of greyhounds and preventing the negative impact of racing on greyhounds. The proposal seeks to build on existing animal welfare legislation to address the specific issues arising in greyhound racing.

The proposal seeks to ensure that a person committing an offence receives an appropriate penalty to help address the concerns regarding greyhound racing that are prevalent among the public in Scotland. The proposal follows a petition which achieved 28,468 signatures calling for an end to greyhound racing in Scotland<sup>83</sup>. The proposal may promote mental health as it would remove the distress felt by some in society arising from the treatment of greyhounds in racing. Alternatively, there may be a negative impact on those who are currently engaged in the use of greyhounds in racing, particularly for those who value social interaction as a result of engaging in this activity.

The Member will seek to ensure that the welfare of greyhounds currently used in racing is taken into account in the timeline for legislation coming into force to ensure that they can find suitable homes if necessary.

The basis for the proposal is grounded in research referred to throughout the consultation document which demonstrates the risk posed to greyhounds by racing.

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<sup>83</sup> Scottish Parliament (2023) *PE1758: End Greyhound Racing in Scotland*. Scottish Parliament. Available from: <https://www.parliament.scot/get-involved/petitions/view-petitions/pe1758-end-greyhound-racing-in-scotland> [Accessed on 22 November 2023].

## Section 3: Questions

### About You

Note: Information entered in this “About You” section may be published with your response (unless it is “not for publication”), except where it is indicated in **bold**.

Q1. Are you responding as:

- an individual – in which case go to Q2A
- on behalf of an organisation – in which case go to Q2B

Q2A. Which of the following best describes you? (If you are a professional or academic, but not in a subject relevant to the consultation, please choose “Member of the public”.)

- Politician (MSP/MP/peer/MEP/Councillor)
- Professional with experience in a relevant subject
- Academic with expertise in a relevant subject
- Member of the public

Optional: You may wish to explain briefly what expertise or experience you have that is relevant to the subject-matter of the consultation:

Q2B. Please select the category which best describes your organisation:

- Public sector body (Scottish/UK Government or agency, local authority, NDPB)
- Commercial organisation (company, business)
- Representative organisation (trade union, professional association)
- Third sector (charitable, campaigning, social enterprise, voluntary, non-profit)
- Other (e.g. clubs, local groups, groups of individuals, etc.)

Optional: You may wish to explain briefly what the organisation does, its experience and expertise in the subject-matter of the consultation, and how the view expressed in the response was arrived at (e.g. whether it is the view

of particular office-holders or has been approved by the membership as a whole).

Q3. Please choose one of the following:

- I am content for this response to be published and attributed to me or my organisation
- I would like this response to be published anonymously
- I would like this response to be considered, but not published (“not for publication”)

If you have requested anonymity or asked for your response not to be published, please give a reason. **(Note: your reason will not be published.)**

Q4. Please provide your name or the name of your organisation: **(Note: The name will not be published if you have asked for the response to be anonymous or “not for publication”)**

Name:

Please provide a way in which we can contact you if there are queries regarding your response. Email is preferred but you can also provide a postal address or phone number. **(Note: We will not publish these contact details.)**

Contact details:

Q5. **Data protection declaration**

- I confirm that I have read and understood the [Privacy Notice](#) to this consultation which explains how my personal data will be used.

If you are under 12 and making a submission, we will need to contact you to ask your parent or guardian to confirm to us that they are happy for you to send us your views.

- Please ONLY tick this box if you are UNDER 12 years of age.

## Your Views on the Proposal

Note: All answers to the questions in this section may be published unless your response is “not for publication”.

Q6. Which of the following best expresses your view of the aim of the proposed Bill to ban greyhound racing in Scotland. **Please note that this question is compulsory.**

- Fully supportive
- Partially supportive
- Neutral (neither support nor oppose)
- Partially opposed
- Fully opposed
- Do not wish to express a view

Please explain the reasons for your response:

Q7. Do you think legislation is required, or are there are other ways in which the proposed Bill's aims could be achieved more effectively for example, compulsory/stricter licensing conditions on greyhound tracks?

- Yes, legislation is required
- No, legislation is not required
- Do not wish to express a view

Please explain the reasons for your response:

Q8. Do you support the proposed penalties as a result of committing an offence of using or permitting the use of greyhounds for racing in Scotland? The proposed penalties are:

- on summary conviction imprisonment for a term not exceeding 12 months or to a fine not exceeding the statutory maximum, or to both such imprisonment and such fine;
- on conviction on indictment imprisonment for a term not exceeding 5 years or to a fine, or both such imprisonment and such fine.



- Fully supportive
- Partially supportive
- Neutral (neither support nor oppose)
- Partially opposed
- Fully opposed
- Do not wish to express a view

Please explain the reasons for your response:

Q9. Taking into account all those likely to be affected (including public sector bodies, businesses, and individuals), is the proposed Bill likely to lead to:

- A significant increase in costs
- Some increase in costs
- No overall change in costs
- Some reduction in costs
- A significant reduction in costs
- Skip to next question

Please indicate where you would expect the impact identified to fall (including public sector bodies, businesses, and individuals). You may also wish to suggest ways in which the aims of the Bill could be delivered more cost-effectively.

Q10. Any new law can have an impact on different individuals in society, for example as a result of their age, disability, gender re-assignment, marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

What impact could this proposal have on particular people if it became law?

- Positive
- Slightly positive

- Neutral (neither positive nor negative)
- Slightly negative
- Negative
- Do not wish to express a view

Please explain the reasons for your answer and if there are any ways you think the proposal could avoid negative impacts on particular people:

Q11. Any new law can impact on work to protect and enhance the environment, achieve a sustainable economy, and create a strong, healthy, and just society for future generations.

Do you think the proposal could impact in any of these areas?

- Yes
- No
- Do not wish to express a view

Please explain the reasons for your answer, including what you think the impact of the proposal could be, and if there are any ways you think the proposal could avoid negative impacts:

Q12. Do you have any additional comments or views on the proposed Bill, beyond those already covered in response to earlier questions? If so, please share here:

# How to respond to this consultation

You are invited to respond to this consultation by answering the questions in the consultation and by adding any other comments that you consider appropriate.

## Format of responses

You are encouraged to submit your response via an online survey (Smart Survey) if possible, as this is quicker and more efficient both for you and the Parliament. However, if you do not have online access, or prefer not to use Smart Survey, you may also respond by e-mail or in hard copy.

### *Online survey*

To respond via online survey, please follow this link:  
<https://www.smartsurvey.co.uk/s/GreyhoundRacing/>

The platform for the online survey is Smart Survey, a third party online survey system enabling the SPCB to collect responses to MSP consultations. Smart Survey is based in the UK and is subject to the requirements of the General Data Protection Regulation (GDPR) and any other applicable data protection legislation. Any information you send in response to this consultation (including personal data) will be seen by the MSP progressing the Bill and by staff in NGBU.

Further information on the handling of your data can be found in the Privacy Notice, which is available either via the Smart Survey link above or here: [Privacy Notice](#)

Smart Survey's privacy policy is available here:  
<https://www.smartsurvey.co.uk/privacy-policy>

### **Electronic or hard copy submissions**

Responses not made via Smart Survey should, if possible, be prepared electronically (preferably in MS Word). Please keep formatting of this document to a minimum. Please send the document by e-mail (as an attachment, rather than in the body of the e-mail) to:

[Mark.Ruskell.MSP@parliament.scot](mailto:Mark.Ruskell.MSP@parliament.scot)

Responses prepared in hard copy should either be scanned and sent as an attachment to the above e-mail address or sent by post to:

Mark Ruskell MSP  
MG.12  
The Scottish Parliament  
EH99 1SP

Responses submitted by e-mail or hard copy may be entered into Smart Survey by my office or by NGBU.

If submitting a response by e-mail or hard copy, please include written confirmation that you have read and understood the [Privacy Notice](#).

You may also contact my office by telephone on (0131) 348 6468.

### *Deadline for responses*

All responses should be received no later than **Wednesday, 01 May 2024**. Please let me know in advance of this deadline if you anticipate difficulties meeting it. Responses received after the consultation has closed will not be included in any summary of responses that is prepared.

## How responses are handled

To help inform debate on the matters covered by this consultation and in the interests of openness, please be aware that I would normally expect to publish all responses received (other than “not for publication” responses) on my website : [www.endgreyhoundracing.co.uk](http://www.endgreyhoundracing.co.uk)

Published responses (other than anonymous responses) will include the name of the respondent, but other personal data sent with the response (including signatures, addresses and contact details) will not be published.

Where responses include content considered to be offensive, defamatory or irrelevant, my office may contact you to agree changes to the content, or may edit the content itself and publish a redacted version.

Copies of all responses will be provided to the Scottish Parliament’s Non-Government Bills Unit (NGBU), so it can prepare a summary that I may then lodge with a final proposal (the next stage in the process of securing the right to introduce a Member’s Bill). The [Privacy Notice](#) explains more about how the Parliament will handle your response.

If I lodge a final proposal, I will be obliged to provide copies of responses (other than “not for publication” responses) to the Scottish Parliament’s Information Centre (SPICe). SPICe may make responses available to MSPs or staff on request.

### Requests for anonymity or for responses not to be published

If you wish your response to be treated as anonymous or “not for publication”, please indicate this clearly. The [Privacy Notice](#) explains how such responses will be handled.

## Other exceptions to publication

Where a large number of submissions is received, particularly if they are in very similar terms, it may not be practical or appropriate to publish them all individually.

One option may be to publish the text only once, together with a list of the names of those making that response.

There may also be legal reasons for not publishing some or all of a response – for example, if it contains irrelevant, offensive or defamatory content. If I think your response contains such content, it may be returned to you with an invitation to provide a justification for the content or to edit or remove it. Alternatively, I may publish it with the content edited or removed, or I may disregard the response and destroy it.

## Data Protection

As an MSP, I must comply with the requirements of the General Data Protection Regulation (GDPR) and other data protection legislation which places certain obligations on me when I process personal data. As stated above, I will normally publish your response in full, together with your name, unless you request anonymity or ask for it not to be published. I will not publish your signature or personal contact information.

Information on how I process your personal data is set out in my [Privacy Notice](#).

I may also edit any part of your response which I think could identify a third party, unless that person has provided consent for me to publish it. If you wish me to publish information that could identify a third party, you should obtain that person's consent in writing and include it with your submission.

If you consider that your response may raise any other issues under the GDPR or other data protection legislation and wish to discuss this further, please contact me before you submit your response. Further information about data protection can be found at: [www.ico.gov.uk](http://www.ico.gov.uk).

## Freedom of Information (Scotland) Act 2002

As indicated above, NGBU may have access to information included in, or provided with, your response that I would not normally publish (such as confidential content, or your contact details). Any such information held by the Parliament is subject to the requirements of the FOISA. So, if the information is requested by third parties the Scottish Parliament must consider the request and may have to provide the information unless the information falls within one of the exemptions set out in the Act. I cannot therefore guarantee that any such information you send me will not be made public should it be requested under FOISA.

Further information about Freedom of Information can be found at: [www.itspublicknowledge.info](http://www.itspublicknowledge.info).