WELFARE OF RACING GREYHOUNDS REGULATIONS 2010

Response of the Greyhound Board of Great Britain

July 2009
INTRODUCTION

Greyhound Board of Great Britain (GBGB) is grateful for the opportunity to respond to the consultation on the Welfare of Racing Greyhounds Regulations 2010.

GBGB is the governing and regulatory body for licensed greyhound racing in England, Scotland and Wales. It became effective in January 2009 following publication of Lord Donoughue’s Independent Review of the Greyhound Industry in Great Britain and has taken on the functions of the British Greyhound Racing Board (BGRB) and National Greyhound Racing Club (NGRC), both of which have been dissolved.

The GBGB board is independently chaired by Maurice Watkins and comprises two further independent non-executive directors (Sir Gordon Duff and Bob Stott), an independent veterinary director (Simon Gower), the independent chairman of the Greyhound Regulatory Board (Dr Ian Reynolds), the GBGB Chief Executive (Ian Taylor), three representatives of the Racecourse Promoters Association (Rachel Corden, Clive Feltham and Bill Glass) and a “practitioner”, Stuart Locke-Hart, jointly representing the Greyhound Trainers Association, Federation of British Greyhound Owners Association and the Greyhound Breeders Forum. This response to the consultation is submitted by the GBGB board and therefore reflects the views of its directors, who represent a variety of the sport’s stakeholders.

Commitment to welfare

Greyhound welfare is GBGB’s highest priority. Indeed, there has been a recent sea-change of attitude in the sport towards welfare issues, together with the commitment of substantial funds. This has been acknowledged by Defra.

In the last five years the number of greyhounds entering GBGB-licensed racing has fallen significantly, whilst the number being rehomed on retirement has more than doubled. In the same period, approximately £1 million has been spent improving the safety of our track running surfaces, extending the racing careers of our greyhounds, and a new research programme has been launched with the intention that the sport’s welfare policy decisions will increasingly be based on outcomes from scientific investigation rather than on anecdotal evidence. Hundreds of licensed trainers have received grants to help them enhance their facilities for the benefit of the greyhounds in their care, and to ensure greyhounds are transported to and from the tracks in safety and comfort. A training programme with a strong welfare bias is being developed to enhance the knowledge, skills and professionalism of the sport’s staff, including vets and track ground staff.

Currently, greyhound racing turnover, generated from both betting and leisure income streams, is under severe pressures due to the adverse commercial conditions brought about by the depressed economic climate. In late June 2009, Hull Stadium closed, at least in part due to its relative inability to sustain a viable business against the abrupt downturn in attendances and turnover experienced by all GBGB racecourses since mid-2008.

The relative average decline in annual attendances at GBGB tracks was -12.8% in 2006/7 and -13.7% in 2007/8. (No accommodation has been made in these figures for the closure of Walthamstow and Reading stadiums). At the same time, income to the British Greyhound Racing
Fund, via the voluntary levy paid by the off-course bookmaking industry, has dropped in 2009 due to falling levels of off-course betting on greyhound racing during the economic downturn.

Despite these economic pressures on the GBGB budget, welfare still remains the largest single area of GBGB expenditure at £3.6m in 2009 (36% of the total GBGB budget). Funding from GBGB to the Retired Greyhound Trust has been increased still further in 2009 and substantial sums are again being provided towards track safety improvements, support for trainers, welfare research and training for a variety of stakeholders.

Effective self-regulation
GBGB is committed to effective self-regulation of the 27 tracks and several thousand individuals (trainers, kennel staff, vets and local officials) that it licenses. It is currently carrying out a thorough and wide-reaching review of the rule book inherited from the National Greyhound Racing Club and, in so doing, has received input from a wide range of stakeholders, and also from welfare charities. GBGB is setting new and revised standards and conditions of licence and is developing a matrix of penalties to be applied in the event of transgressions. An independent Disciplinary Committee and separate independent Appeal Board are both in place.

In parallel, the roles and functions of the GBGB’s field force are also being changed to ensure inspection, improvements and enforcement of conditions and rules at licensed premises is carried out in a consistent and auditable manner nationwide.

It is GBGB’s intention to complete these many regulatory reforms during 2009, as part of its process to secure UKAS accreditation prior to the expected introduction of the Welfare of Racing Greyhounds Regulations to take effect in April 2010.

GBGB believes that an alternative, imposed system of local authority or central regulation on the GBGB tracks would likely deliver nothing other than a less-effective, more expensive and bureaucratic system.

The need for statutory regulations
GBGB does recognise that, in line with Lord Donoughue’s report, there must be an element of statutory regulation pertaining to greyhounds under the Animal Welfare Act. It therefore strongly supports the introduction of regulations, the effect of which will be to install regulated welfare standards at the “independent” and currently unlicensed greyhound tracks still operational in England.

The GBGB has no influence, control or powers over the independent tracks. Yet, independents exist and when welfare problems emanate from them, they reflect badly on the entire sport. The licensed and independent sectors are tarred with the same brush, as the perception amongst the majority of the population is, understandably, that “greyhound racing” is all one sport.

It is envisaged that the Welfare of Racing Greyhounds Regulations will impose a common, uniform welfare standard across all greyhound racing in England, whether under the aegis of the GBGB or an alternative authority. The regulations will, therefore, in effect, be the lowest common denominators which spell out the minimum legal standards of welfare which must be maintained in greyhound racing.
Whilst GBGB supports the majority of regulations as proposed, in several instances, GBGB is not persuaded that the detail in statutory regulation should be as proposed in the draft statutory instrument. Such instances are highlighted on the following pages.

**GBGB RESPONSE TO SPECIFIC QUESTIONS POSED IN THE CONSULTATION DOCUMENT**

**Q1. Do you agree with introducing regulations setting minimum animal welfare standards for all tracks in England, or could this be achieved through a non-regulatory solution?**

GBGB supports the introduction of regulations setting minimum animal welfare standards for all tracks in England.

GBGB does not consider that non-regulatory approaches would likely deliver the required welfare improvements.

Presently, GBGB tracks observe high and improving standards in accordance with the GBGB Rules of Racing, whilst independent tracks are not subject to such rules. Regulation would therefore be desirable to raise welfare standards at independent tracks.

**Q2. Subject to the exemption for tracks belonging to a body that has obtained UKAS accreditation - do you agree that there should be a licensing scheme for greyhound tracks in England?**

Yes. However determined the GBGB-licensed sport is to further improve its standards, improvements across the whole sport are highly unlikely unless the same minimum standards are applied to the current independent tracks.

GBGB therefore supports parliamentary action that will require any greyhound track not licensed by a UKAS-accredited organisation to be licensed by its local authority, such a licence to be dependent on the track meeting defined minimum welfare standards.

If the “independent” tracks are to be required to meet the same minimum welfare standards as the GBGB-licensed tracks, then a licensing scheme, supported by appropriate levels of inspection and audit, is essential to achieve this.

**Q3. Do you agree that if a body applies, at a minimum, those standards required under these regulations at the tracks which it regulates and is accredited by UKAS then any tracks that are affiliated to it should be exempt from the proposed licensing scheme?**

Yes. GBGB is currently seeking accreditation by the United Kingdom Accreditation Service (UKAS) which would confirm that GBGB is meeting set standards and operating in an effective, consistent and auditable manner, befitting a modern regulatory body.

It would be contrary to the principles of better regulation, disproportionate and expensive for a track regulated by a UKAS-accredited authority to also be required to be licensed and inspected by a further authority.
Q4. Do you agree that the licensing conditions should only apply where greyhounds are being raced or trialled?

Yes. The Animal Welfare Act primary legislation already imposes a duty of care on all those responsible for an animal. Therefore, whilst greyhounds are in residential kennels, the Act provides the requirement for an animal’s owner or keeper to provide a suitable environment and diet, the opportunity for the greyhound to exhibit normal behaviour patterns, be housed with, or apart from, other animals, and to be protected from pain, injury, suffering and disease.

Q5. Are the definitions of racing and trialling appropriate?

The GBGB agrees with the definition of “racing” as proposed. However, it is suggested that the definition of “trialling” be adjusted to read as follows:

“The running of a greyhound on a track for any purpose other than a competitive race.”

Q6. Do you agree that there should be a veterinarian present at all race meetings and trials?

Yes. It is a GBGB Rule of Racing that a veterinary surgeon is present whenever greyhounds race or trial at any of its 27 licensed tracks.

Occasionally, a greyhound will incur an injury when racing or trialling and may in such cases require emergency or immediate first aid treatment. The availability of such treatment should be a basic tenet of good regulation and animal welfare.

Q7. Do you agree that the veterinarian does not need any specialist qualifications/training other than being a RCVS registered practicing vet?

GBGB considers the two primary duties of a track veterinarian to be: an inspection of each greyhound before it races or trials and the administration of first aid to relieve pain or suffering in the event of a greyhound incurring an injury.

It is the view of GBGB that a veterinary surgeon registered with the Royal College of Veterinary Surgeons (RCVS) is suitably qualified to carry out the above functions and no other qualifications or training should be required by statute.

Q8. Is the list of desirable qualifications/additional training contained in the draft guidance attached at Annex D suitable? Are there any other qualifications/training that would be desirable?

As above, GBGB is not of the view that any additional qualifications or training are required for track veterinary surgeons to carry out the duties of pre-race/trial inspection and the administration of first aid to relieve pain or suffering to an injured greyhound.

GBGB agrees that, whilst there can be elements of advantage in veterinary surgeons attending race and trial meetings having additional experience beyond that required for membership of the RCVS, this is not essential to the maintenance of greyhound welfare requirements at the racetrack.
It is GBGB’s intention to run a series of courses and seminars designed to enhance the knowledge and skills of attending veterinarians. These opportunities for continuous professional development are likely to be organised in conjunction with relevant organisations such as the British Veterinary Association, RCVS, Society of Greyhound Veterinarians and the Association of Greyhound Track vets. GBGB has also funded the development of a training CD, for new vets working at tracks.

Q9. Do you agree that the veterinarian must examine each greyhound prior to a race or trial?

Yes. All greyhounds to be raced or trialled must be examined by the on-duty veterinary surgeon and withdrawn if not considered fit by the veterinary surgeon, before the start of the race or trial.

It is for consideration whether the regulations should stipulate how close to a race or trial this inspection should take place. A pre-race/trial examination is one of the primary duties of track veterinarians under the GBGB Rules of Racing and track owners ensure sufficient time is scheduled between races or trials to enable the examinations to take place. GBGB recommends that the pre-race or pre-trial inspection is carried out within 15 minutes of the race or trial.

Q10. Do you agree that a register of veterinarian attendance must be kept at the track to demonstrate that a veterinarian has been in attendance and that this register must be kept for at least 3 years?

No GBGB race or trial meeting can take place without a veterinary surgeon in attendance. The proposed requirement is not onerous and such a record could be kept if it is considered that evidential record of attendance is needed.

Q11. Do you agree that a veterinarian should have access to suitable facilities?

Yes. The veterinarian attending a race or trial meeting should be provided with appropriate facilities to enable him/her to carry out his/her duties.

Q12. Are the facilities as described here and in Schedule 1 – paragraph 2 of the draft Statutory Instrument attached at Annex C suitable?

Yes. The facilities listed will enable the attending veterinary surgeon to carry out his/her duties. The proposed facilities are in accord with those required at all GBGB tracks by the GBGB Rules of Racing and Conditions of Licence.

Q13. Should any permanent room be for the sole use of the veterinarian – including any time when a race or trial is not being undertaken? If you are replying on behalf of a greyhound track, would this require you to build such a room?

Yes. The veterinary room should be lockable and for the sole use of the veterinarian. All GBGB-licensed tracks provide such a facility.

Permitting the veterinary room to be used for other purposes risks facilities and equipment being damaged, soiled or misused. It is also important that the veterinarian has a dedicated room in
which treatment can be administered without disturbance to either the veterinarian or the greyhound receiving treatment.

Q14. Do you agree that tracks should provide ventilated kennelling for at least 20% of greyhounds that race? If a different figure is required what evidence is there to support this figure?

GBGB considers it imperative for welfare reasons that all tracks provide kennels, on site, for all greyhounds due to race or trial at an individual meeting. All GBGB tracks already provide sufficient kennelling to ensure every greyhound due to trial or race can be kennelled in a supervised and secure environment, prior to and following its race or trial. Whilst GBGB is not suggesting that current GBGB rules pertaining to kennelling times be enshrined in regulation since these rules exist for reasons of both integrity and welfare, we do consider it very important that kennels are available to accommodate greyhounds so that, in hot weather for example, greyhounds can rest and cool down after a race in a supervised environment prior to being placed back on a transport vehicle. There are likely to be other circumstances when the availability of track kennels is conducive to good greyhound welfare.

Whilst we therefore welcome the proposal that tracks be required to provide kennelling, we do not agree that, and are not clear of the basis on which, it should be only for a minimum of 20% of greyhounds that are due to race or trial at a meeting.

It is the view of GBGB that, since the provision of kennelling is conducive to good welfare (since it provides greyhounds with a secure area in which to rest, and prevents greyhounds being left unsupervised in vehicles on car parks where they may be prone to heat exhaustion, theft or abuse) then it should be a requirement for all tracks to provide sufficient kennelling for all greyhounds due to trial or race at a meeting.

There is a clear risk that, if kennelling is not sufficient for all greyhounds, some will have no option but to be kept in a higher risk environment.

Q15. Are the standards proposed here and in Schedule 1 – paragraph 3 of the draft Statutory Instrument attached at Annex C for kennels appropriate?

The impact assessment accompanying the consultation document states:

“All GBGB tracks already have adequate kennelling”.

If “adequate” is defined by the standards proposed in paragraph 3, this statement is incorrect.

A recent survey conducted by the GBGB confirms that the majority of GBGB tracks do not have kennels meeting all the requirements proposed in paragraph 3 of the draft Statutory Instrument. However, in our view this is largely because the relevant standards are themselves inappropriate and could be considered to be based in aspiration rather than in statistic and experience garnered from the kennelling systems currently in place at GBGB tracks.

Comments are provided on each of the proposed requirements:
a) be at a minimum 136cm long, 87cm wide and 110cm high

The results of GBGB’s survey confirm that of the 27 GBGB-licensed tracks, 24 have at least one kennel that does not meet these proposed dimensions, albeit by a very small margin in the majority of cases. Seven GBGB tracks (26%) have kennels that do not meet the proposed minimum length dimension. Fourteen GBGB tracks (52%) have kennels that do not meet the proposed minimum width dimension. Nineteen GBGB tracks (70%) have kennels that do not meet the proposed minimum height dimension.

In 2008, there were 431,777 greyhound race runs on GBGB licensed tracks and a further 130,849 greyhound trial runs. In every single case, the individual greyhound due to race or trial was kennelled at the track for a period before and after its run. There is no evidence that the welfare of any greyhound was compromised as a result. Indeed, it would not be unreasonable to suggest that the licensed sector has done an excellent job ensuring that its track kennels provide a secure, supervised and appropriately-maintained environment for greyhounds to rest before and after their race or trial.

GBGB is not aware of any evidence that track kennels need to be of the proposed minimum dimensions. The International Air Transport Association (IATA), for example, stipulates within its regulations on container sizes for the transport of dogs a minimum length of 122cm, a minimum width of 81cm and a minimum height of 89cm. These containers are used for the transport of greyhounds on long-haul flights of considerable duration. There is surely no need for a track kennel, in which a greyhound will spend no more than five hours (and in most cases less), to be constructed to even larger dimensions.

It is also important to make clear that, should the proposed minimum dimensions be enshrined in statute, very significant and disproportionate costs will be imposed on 24 GBGB-licensed tracks that will need to rebuild or significantly modify their existing kennels. In recent years a number of tracks have completely rebuilt their kennels, and at great cost (some in excess of half a million pounds). Some of those built as recently as five years ago do not meet the minimum sizes proposed. Please refer to our response to Q.27 for our views on the cost of kennel construction that also take into account the other requirements proposed within Schedule 1 – paragraph 3 of the Draft Statutory Instrument.

In summary, GBGB cannot identify any potential welfare benefit to 24 GBGB tracks being required to rebuild or modify their kennels, at great cost, to meet the proposed minimum dimensions.

GBGB proposes that the regulations require all kennels at tracks to be of sufficient size to enable a greyhound to exhibit normal behaviour: to comfortably enter, stand up, lie down in a natural position and turn around easily. It is suggested that the guidance document accompanying the regulations sets out recommended dimensions for tracks wishing to construct new kennels.

b) be occupied by no more than one greyhound

GBGB supports this proposal.
c) have walls and floors with a cleanable surface

GBGB supports this proposal although guidance on what constitutes a cleanable surface might usefully be provided.

d) be cleaned and dried between use

GBGB supports the proposal that each track kennel be cleaned between uses. However, it would be helpful for the regulations or guidance to define what constitutes “cleaned”.

In the event that “deep” cleaning is the intent of the recommendation, to include use of a disinfectant solution etc, GBGB would be concerned that there are occasions when it is not practically possible to completely dry a kennel before it is next occupied, particularly at those GBGB-licensed tracks that host two race meetings on the same day with an interval of only a couple of hours.

e) have a comfortable area for greyhounds to lie

GBGB supports this proposal although guidance on how this requirement can be met might usefully be provided.

f) be adequately lit to allow the safe examination and handling of greyhounds

GBGB supports this proposal.

g) allow the greyhound to be observed when inside

GBGB supports this proposal.

h) be constructed so as to minimise any risk of injury to the greyhound

GBGB supports this proposal.

i) have a regular flow of clean air, whether by natural or artificial means, to allow sufficient ventilation for the greyhound

GBGB supports this proposal.

j) have an ambient temperature between 10°C and 26°C when occupied by a greyhound

Such a stringent temperature range is, in the view of GBGB, unnecessary and indeed will be extremely difficult to maintain in many cases. GBGB is not aware of any scientific evidence relating to greyhounds that support the introduction of the proposed absolute temperature range in either the upper or lower parameters.

In 2003, licensed racing lost a greyhound to heat exhaustion whilst in its kennel at a licensed track. This terrible incident was a watershed in the sport’s history and over £1 million was spent in the period that immediately followed to ensure every licensed track had kennels equipped with air management, insulation and extra ventilation or air conditioning systems as appropriate. Since
2003, an estimated three million greyhounds have been successfully and safely kennelled at our licensed tracks.

At the low end of the scale, ambient temperatures of below 10°C are commonplace throughout the winter months and as far into the year as early April, and are mitigated yearly without incident through, for example, provision of coats and bedding in kennels.

Should the specific and stringent temperature range proposed be required by statute, the majority of GBGB tracks will need to reconstruct their kennels and install expensive and sophisticated air conditioning systems with no apparent welfare benefit.

We recommend instead that the regulations require that temperatures in occupied kennels be maintained within a range that is physiologically acceptable to a greyhound and as monitored by the local stewards and veterinary surgeon.

It is important to point out that at every track, when greyhounds are kennelled, a veterinary surgeon will be on duty and, as stated under proposal (g), GBGB supports the introduction of a requirement for a greyhound to be observable when inside a track kennel.

**Q16. Should there be a 12 month interval before the requirement to provide kennels applies? If you are replying on behalf of a greyhound track, will this condition require you to build such kennels?**

Yes. The construction of kennels is a significant undertaking, likely to require planning permission and considerable capital expenditure. In some cases it is likely that 12 months will be insufficient for such a project to be completed, particularly if disruption to a track’s business (i.e. racing schedule) is to be avoided. GBGB considers it entirely reasonable to allow tracks a 36 month period in which to complete such work.

**Q17. Should identification by both microchip and tattoo be required or is microchipping alone sufficient?**

GBGB supports the introduction of regulations, the effect of which will be to require all greyhounds that race or trial in England to be identifiable.

GBGB does not consider microchipping alone to be a sufficient method of identification. Whilst GBGB is making rapid progress to evaluate the potential benefits that microchipping can offer, and is committed to its introduction as the primary method of identification for greyhounds that race on its tracks (on the assumption that its ongoing pilot projects continues to prove successful), earmarking will remain a secondary method of identification for the foreseeable future.

GBGB recommends that the introduction of this requirement be accompanied by an appropriate lead-in time. It is questionable whether it is reasonable and in accord with veterinary best practice to expect owners of adult greyhounds currently racing to earmark them if they do not already carry such a method of permanent identification.
Q18. Do you agree that only databases which reach the standards set in Schedule 1, Part 2 of the draft Statutory Instrument attached at Annex C are appropriate databases for racing greyhounds to be registered on?

GBGB agrees with the majority of the proposed standards set in Schedule 1, Part 2 but is concerned with the proposals relating to “Access to information” under 9.(3).

Specifically, it is the view of GBGB that the definition of “authorised third parties” should be amended or defined. It is important that GBGB is not required by statute to provide access to information to “any representative of the Secretary of State” or “any representative of the local authority” but instead should be provided to authorised representatives of the Secretary of State or local authority. It would be helpful for either the statutory instrument, or guidance document, to list those authorised representatives, who might reasonably include local authority dog wardens and animal welfare officers, police officers, practicing veterinary surgeons and representatives of bona fide welfare organisations that have signed a memorandum of understanding with the database operator.

Q19. Do you agree that track managers should be responsible for ensuring that only greyhounds that are appropriately identified and registered are racing or trialling at their track?

The draft statutory instrument proposes that the operator of a track (i.e. the person responsible for managing a track) be licensed. Therefore it is entirely appropriate that the operator of a track be responsible for ensuring that the licence conditions are met, one of which should be that greyhounds running at the track are appropriately identified and registered on a database.

Under the GBGB Rules of Racing, the identity of a greyhound is confirmed every time it races or trials at a GBGB-licensed track with all such greyhounds registered on the central GBGB database.

Q20. Are the details to be recorded – as described in paragraph 5 of Schedule 1 of the draft Statutory Instrument and above - appropriate? Are there any other details that should be recorded?

GBGB supports the proposals set out in paragraph 5(1), specifying the details that must be recorded in relation to all greyhounds entering a race or trial at a track. In the case of GBGB-licensed racing, this information is recorded on the GBGB database and provided to each track as relevant.

Q21. Do you agree that 5 years is an appropriate length of time for records to be kept?

The GBGB database already records this information ad infinitum and it is arguable that the regulations require records to be maintained by all operators for a longer period than five years to enable a greyhound to be identified throughout its life. At worst the requirement should be for records to be kept for a minimum of five years.
Q22. Should both the owner and the trainer of a greyhound be required to produce identification the first time a greyhound runs at a track?

GBGB does not support this recommendation. At all GBGB-licensed tracks, greyhounds are presented for a race or trial by their licensed trainer or trainer's authorised representative (e.g. kennel hand). Unless the trainer or representative is also the owner of the greyhound, the owner is not certain to be present since many owners live many miles from the track at which their greyhound races or trials.

All trainers and kennel hands racing or trialling greyhounds on GBGB-licensed tracks are themselves licensed and provided with a licence bearing a photograph that must be produced on request. No individual can present a greyhound for a race or trial unless they are in possession of a licence.

Therefore, GBGB supports only the requirement that the trainer or his/her representative be required to produce a photographic means of identification the first time a greyhound runs at a track.

Q23. Do you agree that tracks should be required to keep injury records?

Yes. GBGB supports this proposal.

Q24. Are the details to be recorded – as described in paragraph 6 of Schedule 1 of the draft Statutory Instrument and above - appropriate? Are there any other details that should be recorded?

GBGB supports the proposal that records include the nature of the injury sustained and details of any treatment administered to the greyhound.

GBGB suggests that instead of the proposals stipulating the microchip number of the greyhound be recorded, that the identity of the greyhound be recorded, to be determined by either microchip and/or earmark.

It is not clear why it is proposed that the distance of the race or trial in which the injury occurred also be recorded. In many cases, such a record is likely to be irrelevant, since race or trial length has not been identified as an injury risk factor and an injury can occur at any point during a race or trial.

Q25. Do you agree that 10 years is an appropriate length of time for injury records to be kept?

Veterinary surgeons are required to retain veterinary records for a period of six years. It is the view of GBGB that the same time frame be stipulated as a minimum by the regulations in respect of injury records.
Q26. Do you agree that the suggested costs and benefits set out in the Impact Assessment are a reasonable estimate of the likely costs and benefits? If not, can you provide evidence of what any likely costs and benefits should be?

With the exception of the estimated costs of constructing kennels at tracks (please see our response to Q27, below), GBGB believes that the Impact Assessment provides a reasonable estimate of the likely costs to tracks of meeting the statutory regulations, as proposed.

It should be noted that, for microchipping to be introduced as a comprehensive method of identification across greyhound racing, it is likely that the costs of the chips themselves and the supporting scanners and other hardware will be shared between track operators and greyhound owners and trainers.

In the case of GBGB-licensed racing, GBGB is providing each track with screens and hardware to enable a range of data, specific to each individual scanned greyhound, to be displayed.

Q27. Does the estimated cost of building a new set of kennels seem reasonable? If not, can you provide evidence of what any likely costs and benefits should be?

The impact assessment (p.11) quotes:

“The NGRC has estimated that it would cost about £82,000 to construct 72 kennels of a standard to meet their requirements.”

GBGB is aware that in 2008 the BGRB submitted to Defra an estimate from a recognised construction firm that quoted £22,000 to construct just 12 air managed kennels (equivalent to £132,000 for 72 kennels).

GBGB’s view, having considered the matter in more depth, is that both quotations considerably underestimate the cost of constructing kennels capable of meeting the proposed standards stipulated in Schedule 1 – paragraph 3 of the draft Statutory Instrument.

Firstly, it should also be noted that the majority of GBGB tracks require more than 72 kennels, to accommodate greyhounds in additional races and trials. GBGB tracks typically have 100 – 120 individual kennels. Secondly, and with greyhound racing a year-round activity, there will be occasions when an air management system alone is insufficient to maintain the proposed ambient temperature range of 10 – 25°C in an occupied kennel. A full air conditioning system is likely to be required and the estimated costs must be raised accordingly.

Based on a quotation submitted by a bona fide building contractor, and the costs incurred by existing GBGB tracks that have recently constructed new kennels, we estimate the cost of constructing 100 new kennels to Defra’s proposed specifications at between £350,000 and £750,000 per track, depending on the level of fitting, planning and legal costs. On top of this there will be, in cases of limited land footprint, alternate structure or location, the further significant impact to turnover and continuity of closure of operations during the building or remedial work, that could extend to many weeks, since it would not be possible to hold meetings without kennelling provision. In the current economic climate, a forced closure could have dire consequences to the stadium.
It is important to point out that kennels fitted with air conditioning must be located within an outer shell building; it is not possible to install effective air conditioning to “outdoor” kennels and, therefore, in the majority of cases a complete rebuild is likely to be required.

Please also see our response to Q15, above.

**Q28. Does the estimated cost of a local authority licence seem reasonable? If not, can you provide evidence of what the likely costs would be?**

GBGB is not in a position to comment on the likely costs of a local authority licence. However, and by comparison, the current GBGB track licence fee is £1,920 per annum, to include the costs of all inspections. This licence fee is currently under review.

**Q29. Further to any questions on the draft Statutory Instrument already asked in this consultation, do you have any further comments on the draft Statutory Instrument attached at Annex C?**

No.

**Q30. Do you have any comments on the draft guidance attached at Annex D? Is the guidance detailed enough or would it be helpful if the guidance provided a more detailed explanation of all the requirements contained in the regulations?**

The Draft Guidance states:

“It is also recommended that the veterinary surgeon be provided with a flat area on which to examine dogs prior to running. This area should be close enough to the track to allow the veterinary surgeon to continue to monitor racing or trialling.”

GBGB assumes that the “flat area” refers to a floor area on which greyhounds can be trotted up in front of the veterinary surgeon.

It should be possible for a race or trial meeting to be organised in such a way that the vet is able to examine greyhounds without at the same time having to monitor racing or trialling. The examination of a greyhound is a very important duty and the vet should not be distracted from so doing.

Please also refer to additional comments related to the draft guidance elsewhere in this response document.

ENDS