

Proposed Prohibition of Greyhound Racing (Scotland) Bill - Mark Ruskell MSP

Summary of Consultation Responses

This document summarises and analyses the responses to a consultation exercise carried out on the above proposal.

The background to the proposal is set out in section 1, while section 2 gives an overview of the results. A detailed analysis of the responses to the consultation questions is given in section 3. These three sections have been prepared by the Scottish Parliament's Non-Government Bills Unit (NGBU). Section 4 has been prepared by Mark Ruskell MSP and includes his commentary on the results of the consultation.

Where respondents have requested that certain information be treated as "not for publication", or that the response remain anonymous, these requests have been respected in this summary.

In some places, the summary includes quantitative data about responses, including numbers and proportions of respondents who have indicated support for, or opposition to, the proposal (or particular aspects of it). In interpreting this data, it should be borne in mind that respondents are self-selecting and it should not be assumed that their individual or collective views are representative of wider stakeholder or public opinion. The principal aim of the document is to identify the main points made by respondents, giving weight in particular to those supported by arguments and evidence and those from respondents with relevant experience and expertise. A consultation is not an opinion poll, and the best arguments may not be those that obtain majority support.

Copies of the individual responses are available on the following website: [End Greyhound Racing](#). Responses have been numbered for ease of reference, and the relevant number is included in brackets after the name of the respondent.

A list of organisational respondents is set out in the Annexe.

Section 1: Introduction and Background

Mark Ruskell's draft proposal, lodged on 7 February 2024, is for a Bill to:

“...promote the welfare of greyhounds by introducing an offence of permitting a greyhound to race at racetracks in Scotland.”

The proposal was accompanied by a consultation document, prepared with the assistance of NGBU. This document was published on the Parliament's website, from where it remains accessible:

[Mark Ruskell - Proposed Prohibition of Greyhound Racing \(Scotland\) Bill Consultation Document \(parliament.scot\)](#)

The consultation period ran from 8 February 2024 to 1 May 2024.

Mark Ruskell raised awareness about the consultation on social media and through print and broadcast media to invite responses from individuals and organisations on all sides of the debate. The consultation received extensive coverage, including from national TV and radio. Mark Ruskell did not directly reach out to individuals or organisations to invite responses.

The consultation exercise was run by Mark Ruskell's parliamentary office.

The consultation process is part of the procedure that MSPs must follow in order to obtain the right to introduce a Member's Bill. Further information about the procedure can be found in the Parliament's standing orders (see Rule 9.14) and in the *Guidance on Public Bills*, both of which are available on the Parliament's website:

- Standing orders (Chapter 9): [Standing Orders | Scottish Parliament Website](#)
- Guidance (Part 3): [Guidance on Public Bills | Scottish Parliament Website](#)

Section 2: Overview of Responses

In total, 789 responses were received. 782 were made via Smart Survey, and the remaining 7 were emailed to the Member.

There were 21 responses attributed to organisations, all but one of which identified as third sector (charitable, campaigning, social enterprise, voluntary, non-profit) organisations.

768 responses were made by individuals. They identified as follows:

- 28 (4%) from professionals with experience in a relevant subject;
- 10 (1%) from academics with expertise in a relevant subject; and
- 730 (95%) from members of the public.

566 (72%) respondents were content for their submission to be published and attributed to them. 170 (21.5%) respondents requested that their response be published anonymously, and 53 (6.5%) respondents asked for their response to be considered, but not published.

A significant majority of respondents, 680 - just over 86% - were fully supportive of the proposal to prohibit greyhound racing in Scotland. A further 6 respondents (0.8%) were partially supportive. A small minority, 94 respondents, just under 12%, were fully opposed to the proposal. Four respondents (0.5%) were partially opposed. One respondent was neutral, and four respondents did not wish to express a view.

In general, the responses were polarised, with strong views given both in support and in opposition, with little middle ground. A very small number of respondents were supportive of legislating to impose further regulation and/or a licensing scheme on those wishing to race greyhounds in Scotland.

The main reason given for fully supporting the proposed ban on greyhound racing in Scotland was the view that racing at speed on oval tracks is inherently dangerous for greyhounds, often leading to significant injury, psychological trauma and death. Many accounts were given by organisations and individuals involved in the rehoming of former racing greyhounds of significant difficulties respondents believed greyhounds had experienced as a direct consequence of racing. Relating to this, many respondents highlighted the short racing life of greyhounds and the high level of wastage in the industry. Wastage describes the process by which animals are bred for racing but may be discarded before or after a period of racing. Respondents in support of the proposal also highlighted the resulting burden they believed racing placed on third sector organisations to care for and rehome greyhounds, many of which have complex issues and needs, after they had finished racing.

Other reasons given for supporting a ban included that using and monetising animals for entertainment was an archaic practice which should have no place

in a modern, compassionate Scotland that values animal welfare; that it is a good time to bring in a ban, as there is only one, independent, track currently operating in Scotland; and that banning greyhound racing would remove an avenue of gambling, an activity which some of those supportive of a ban believed can have very serious negative impacts on communities and individuals.

The main reasons given for opposing the proposal to ban greyhound racing in Scotland were that greyhounds enjoy racing, and often need to race, and that organised racing provides a safe and controlled opportunity for them to do so. Many felt that racing was currently appropriately managed and operated with good levels of welfare for greyhounds, which are loved and well cared for.

Many of those opposed noted that there is only one greyhound racing track operating in Scotland, on a small, hobbyist, scale, and that legislating for a ban on greyhound racing was therefore disproportionate and unnecessary. It was also noted by some of those opposed to the proposal that greyhound racing has long standing historic links in some communities, and is of historic, cultural and social importance to those communities. Concern was expressed that if racing was banned, that illegal racing may take place which could prove a greater threat to greyhound welfare, and that a ban may see the decline, or possible extinction, of the breed in Scotland. Another theme amongst those opposed or partially opposed to the proposal was that greater regulation/licensing may represent a proportionate alternative to a ban on racing.

Disclaimer

Note that the inclusion of a claim or argument made by a respondent in this summary should not be interpreted as verification of the claim or as endorsement of the argument by the Non-Government Bills Unit.

Section 3: Responses to Consultation Questions

This section sets out an overview of responses to each question in the consultation document.

Aim and approach

The consultation document outlined the aim of the proposed Bill and what it would involve. Respondents were asked:

Question 1: Which of the following best expresses your view of the aim of the proposed Bill to ban greyhound racing in Scotland?

(Fully supportive / Partially supportive / Neutral / Partially opposed / Fully opposed; Do not wish to express a view).

Please explain the reasons for your response.

All 789 respondents answered this question. 686 respondents (87%) were supportive of the proposal to ban greyhound racing in Scotland, (680 were fully supportive, and 6 respondents were partially supportive). 98 (12%) respondents (13%) were opposed to a ban on greyhound racing in Scotland (94 respondents were fully opposed, and 4 respondents were partially opposed). One respondent was neutral on the proposal and four did not wish to express a view.

Reasons given for supporting a ban on greyhound racing in Scotland

A large majority of respondents, 680, 86%, fully supported a ban on greyhound racing in Scotland, including 20 of the 21 organisations which responded. Reasons for supporting a ban that received most mentions in the responses were:

- racing at speed on oval tracks is inherently dangerous for greyhounds and risks significant injury, trauma and death;
- current legislation is not effective in protecting greyhounds (the Scottish SPCA noted, “the legislation in place to protect racing greyhounds, the Animal Health and Welfare (Scotland) Act 2006, is not effective”);
- the facilitation of greyhound racing has many associated negative impacts on greyhounds, such as high levels of wastage (due to dogs having a very short racing life and being dispensed with if no longer of monetary value) and issues with how dogs are kept, transported and prepared for racing (Dogs Trust called on the ban to cover trials and

- sales trials, and all commercial, non-commercial and recreational racing);
- those responsible for greyhound racing do not provide appropriate funding for the care of dogs no longer racing;
 - the responsibility for the care and rehoming of former racing greyhounds is placed on third sector organisations, and is not sufficiently resourced by the racing industry (including bookmakers);
 - greyhound racing exists only for gambling purposes and therefore both exploits animals for solely monetary gain and encourages gambling, an activity which can have very negative consequences for individuals, their families and communities;
 - the nature of greyhound racing across the UK and Ireland is interlinked but disparate in terms of its management and regulation which makes ensuring appropriate welfare standards across the different nations impossible;
 - greyhound racing is in decline, both in Scotland, the UK and around the world, as it is perceived as archaic and cruel, and it is therefore the perfect time to legislate for a ban. There is only one track operating currently in Scotland, which is an independent track operating on a small scale. In the UK numbers have declined from 277 tracks in total in the 1940s, to 22 tracks in total currently. Greyhound racing also only operates currently in seven countries in the world.

Physical and psychological effect of racing on greyhounds

Several of the responses by organisations set out detailed information about the risks they believed greyhounds are subject to when racing and the types of injuries suffered. Please see the published organisation responses for details. The Scottish SPCA (ID 241402870) stated that racing was inherently dangerous due to the speed dogs reach and the curved tracks. Its response noted that it had called for a ban on unregulated tracks (setting out various concerns about the one existing, independent, track in Scotland due its lack of governing body oversight) over a long period of time and added that there was now a strengthened case for also banning regulated racing. It stated:

“A fundamental problem with Greyhound racing is the design of the track (both GBGB [Greyhound Board of Great Britain] and unregulated tracks) with the anti-clockwise oval track. Studies have shown that the majority of injuries occur around the bends (statistically greater on the first bend). Greyhounds chase by sight of the (prey) lure as such they will “bunch up” on the bends to follow the line of the lure. Even with a well prepared track, 6 dogs “bunching up” at approximately 30MPH around corners can lead to accidents and the statistics provided by GBGB highlight that while unintended, there is a likelihood of accidents occurring. Dogs running and training anti-clockwise around an oval racetrack increases the risk of injury for that greyhound most notably their left forelimb and right hindlimb with more injuries to their hock in the right limb. These are very specific injuries directly as a result of dogs training and running on the type of track that is used for greyhound racing.”

Several respondents commented on the specific issues caused by racing on a curved/oval track. The organisation Blue Cross quoted a report by the Scottish Animal Welfare Commission (SAWC)¹, which stated, "...only by racing on straight tracks would the risks and injuries associated with greyhounds running around bends be eliminated." Blue Cross believed there is no indication that racetracks would be changed from curved to straight tracks by those responsible for racing. However, the organisation One Kind (ID 243498780) held a different view, stating:

"It has been suggested that racing on straight tracks could remove these risks. However, in oral evidence to the Rural Affairs and Islands committee in March this year, a GBGB trainer said:

"Straight tracks could have an adverse effect, because a dog has to run faster in a straight line over 500m than it does when there is a bend. They do not keep up the speed on the bend, although they might get up to a good speed, but, if they were to run flat out for 500m, there would be more chance of injury."

So, it seems that, even if replacing oval tracks with straight ones was feasible, the result would be to perhaps alter the type of injuries dogs suffered, but it would not reduce the number of injuries or deaths and could potentially increase them. As such, it is impossible to race greyhounds in any way that does not create a risk and severity of injuries not experienced by other dogs. (It anyway seems unlikely that the industry would be willing or able to convert to straight tracks.)"

Dogs Trust believed it was important that the proposed Bill sufficiently defined a racetrack to ensure there are no loopholes which would allow racing to continue in any form.

Forever Hounds Trust, stated:

"...there is strong evidence to support the ban of this inherently dangerous activity, which exploits greyhounds by placing them at risk of catastrophic injury and death whilst on the track and fails to make adequate provision for them once their racing "career" has ended."

The response also gave detailed comment on the origins and traceability of racing greyhounds, and on injury statistics and a range of welfare issues (including doping) and outlined cases of specific greyhounds. Please see the response for details.

Many individual respondents fully supportive of a ban on greyhound racing in Scotland gave personal accounts of the negative effects they believed racing had had on greyhounds which were subsequently rehomed. A selection of

¹ [Report on the welfare of greyhounds used for racing in Scotland by the Scottish Animal Welfare Commission \(www.gov.scot\)](http://www.gov.scot).

quotes from some of those who set out their personal experience is set out below by way of an example – there were many more similar responses (please see the published responses for details):

Rebecca Coltart (ID 241366968) – “As a fosterer of greyhounds, I have seen the devastating impact that greyhound racing has. These dogs arrive not as dogs but as traumatised machines. They are scared by the littlest, most common, things and don't know how to function in a normal home. Yet I know these are the privileged dogs that survived their awful past, while countless others were killed or even transported to countries where more cruel treatment is allowed. Within a matter of months, these dogs transform into wonderful pets and yet they are always marked by their pasts. We cannot continue to exploit dogs in this way, it is cruelty in its simplest form. They are locked up almost all day, fed high-protein diets that rot their teeth to keep them at peak muscle mass and then raced until injured.”

Anonymous ID 241289605 – “Through my personal experience of owning three ex-racing rescue greyhounds (two currently, one previously) I recognise the harm that greyhound racing does to the individual dogs. Two of my dogs have had behavioral issues which are related to their time in the racing industry and all three have had medical issues related to their racing history (mainly musculoskeletal problems) and all have had visible physical scars from injuries sustained from racing or their experiences in racing kennels.”

Stephanie Maureen Clark (ID 241378581) – “As a fosterer and adopter of rescue greyhounds I know the damage done to these beautiful gentle giants. They often come with recurrent injuries that may appear to be healed but due to previous damage racing causes they often leave a weakness and reoccur throughout life. These dogs often don't know how to play as they never have the chance to as puppy's. They come covered in scars, have arthritic toes from running round a track at high speeds. They are left nervous and anxious and either freeze from fear or can be reactive as they aren't socialised with other breeds. They are sensitive animals and mine have had worn down front teeth from gnawing at the bars on the kennel cages. They have bald rear ends and parts of the tail from sitting on concrete in kennels. They have little human interaction so can be afraid of new people and have separation anxiety once they find someone they feel safe with. Sleep aggression is another fallout from living alone in racing kennels. They are not used to there being anybody around so when sleeping once rescued, they get a fright when they are woken or sense someone going past them, reacting with fight/flight response which can and does lead to then biting unintentionally. They are not aggressive by nature but left frightened by racing. They panic in small spaces due to be manhandled into small narrow traps at race meets. These gentle creatures deserve so much more than the awful life they have pre rescue, discarded at a young age when they stop making money.”

Craig Sussman (ID 242075597) – “Having adopted and owned retired racing Greyhounds over 23 years, it is apparent how racing, their lives on the track and in some dogs, the results of abuse they have endured clearly highlights the need for dog racing to end. I've owned a female Greyhound who broke a leg racing, who was then forced to raise three litters of puppies over five years resulting in her being eight years old when finally allowed to retire. I currently have a male Greyhound who, when we first adopted him used to yelp every time one of us would touch his ears. This clearly indicated his ears were pulled. Another common characteristic that most of my Greyhounds have had, is major health issues when they get past ten years old. These dogs are not looked after properly, they are expendable 'things'.”

Sara Grahamslaw (ID 242177665) – “This is not a sport, this is the exploitation of the gentlest of dogs, specifically to make money. I have had many years of rehoming these poor, abused, gentle, terrified hounds from the racing industry. They are fearful, unsocialised and affection and care is an alien concept to them. It takes some time to gain their trust and ensure that they adapt to becoming a much loved family pet. Most remain terrified of men particularly, loud noises, have their heads constrained, even in a hug, thunder, cars etc. The awful paradox of the exploitation of these hounds is that they are truly the gentlest, most affectionate of dogs. The concrete floors they sleep on, the cocaine they are occasionally given to speed them up, the injuries sustained whilst racing which are very often not addressed by a trip the vet, the pain of having the owners initials tattoos on their tender soft ears, the lack of any affection, even their death following an awkward fall whilst racing....I could go on.”

Individual respondent Jacqueline Brown (ID 241366092) stated that she has adopted 7 greyhounds and fostered several and her response provides many accounts of the physical and psychological injury and trauma suffered by dogs in her experience. She stated:

“... through my volunteer work I have transported many greyhounds, picked them up from trainers 'kennels' and I've assessed dogs being surrendered to the rescue. EVERY SINGLE GREYHOUND I ENCOUNTERED WAS DAMAGED in some shape or form as a direct result of racing. Even the dogs that were officially registered with industry 'regulator' GBGB. In my opinion this evidences that LICENSING DOES NOT WORK.”

Her response concluded, “This is just a snapshot. I could write pages and pages on this subject. Suffice to say my experience of the racing industry has consistently been one of abuse, neglect and exploitation for financial gain. The public are left to pay for the damage, either that or the dogs are killed.”

After racing care and rehoming issues

In addition to the issues experienced by former racing greyhounds highlighted by individuals, examples of which are provided above, many respondents commented on the burden placed on the third sector to deliver after racing care and rehoming services, and the perceived underfunding by those responsible for greyhound racing. Forever Hounds Trust joined other respondents in commenting on the reliance on the third sector to care for and rehome racing greyhounds, stating:

“Charities are increasingly having to fund the treatment of former racing greyhounds who enter their centres in poor states of health and wellness. Issues such as untreated musculoskeletal injuries and dental disease are hugely costly - coupled with absent vaccination records and un-neutered dogs – resulting in charities paying for mistreatment by those who have profited from them. Despite a mandatory requirement – it is apparent that trainers are not consistently completing the retirement form (aka “the Green Form”) which is supposed to be submitted to the GBGB on relinquishment of a dog once no longer registered to race, meaning there is no oversight or account ability of where these dogs end up.”

The response states that there is scheme which involves the GBGB (Greyhound Board of Great Britain) providing £400 to pay for the rehoming of retiring racing greyhounds, noting “The £400 bond does not even come close to covering the ongoing costs”. This was one of many responses which highlighted the £400 rehoming fee paid by the industry and stated that it was vastly inadequate, with the hundreds or thousands of pounds difference required to properly look after retired greyhounds being picked up by third sector welfare and rehoming centres.

The Scottish Greyhound Sanctuary (ID 241402076) highlighted the toll rehoming can have on people working and volunteering in third sector rescue and rehoming centres, commenting:

“Compassion fatigue is rife. Volunteers regularly experience exhaustion, depression, anxiety, insomnia, detachment. The impact of rescue work affects our relationships, families and workplaces. Yet we continue to do it because someone has to pick up the racing industry’s waste.”

Regulated v unregulated tracks and value of regulation/licensing

Some responses commented on the fact that there is only one greyhound racing track operating in Scotland currently, and it is an independent track (not managed by the GBGB and therefore not subject to any GBGB regulation) that is operated on a small scale. Blue Cross was one of several respondents which highlighted particular concerns about the Thornton racetrack due to it being an independent track, rather than a track managed by the GBGB. As a result, Blue Cross stated that there was no proper regulated oversight, no drug testing or proper gathering of data, and no requirements for a vet to be in

attendance. However, Blue Cross did not believe licensing was an appropriate answer due to the fundamental nature of racing, stating:

“Greyhound racing is dangerous for the dogs involved, whether at licensed or unlicensed tracks. Running at speed around oval tracks causes significant injury to many dogs, and in some cases the injuries are so severe that it is necessary to euthanise the dog.”

The UK Centre for Animal Law (ID 243552927) stated that before the consultation was launched on a proposed ban, it had supported proposals to further regulate and licence greyhound racing, but now supported the proposed ban, explaining its position as follows:

“We felt that a statutory licensing scheme was proportionate in that it would not unfairly penalise the single existing greyhound racing track in Scotland (Thornton), which has been operating lawfully up to now, while it had the potential to improve welfare at the track through the imposition of conditions. We also stated that an independent licensing authority would be preferable to one whose functions include promoting the continued existence of greyhound racing (the Greyhound Board of Great Britain). Given the very limited amount of greyhound racing in Scotland, we would not expect a licensing scheme to impose an excessive enforcement burden on local authorities. That said, our response to the Scottish Government consultation also stated our belief that greyhound racing should be phased out in all administrations of the UK. Our support for a proposed licensing scheme also reflected the desirability of achieving change within a short time frame. The UK Centre for Animal Welfare Law supports the proposed Bill on the basis it has the potential to end the risks to animal welfare inherent in the sport of greyhound racing in a timely manner.”

The organisation Almost Home stressed its belief that no amount of regulation could prevent greyhounds being injured and killed, stating:

“No amount of regulation can prevent this! If we want to put a stop to thousands of innocent dogs being hurt, injured and emotionally and psychologically scarred, with many more hundreds killed, every year – year on year – then the answer can only be a ban.”

Dogs Trust noted that it felt the proposed Bill should, in addition to a ban on racing in Scotland, place welfare regulation on those in Scotland who own, keep and train greyhounds for racing in other jurisdictions.

Impact and effect of gambling activity

Many respondents believed racing to be unethical as it fundamentally places a monetary value of a greyhound's life and that the driving priority to monetise a greyhound as much as possible, comes at the expense of its welfare. Individual respondent Louisa Macdonald (ID 237411780) stated:

“Unlike other working dogs, these dogs have a monetary value placed on them and this increases the chances of abuse, dogs are often fed gruel to keep the internal systems light for extra speed and this causes their teeth to decay leading to them starving ... They deserve to be valued not worked to death for a value. The monetary value is the main problem here compared to all other working dogs, they deserve better, they aren't horses, they are companions and helpers. From sheepdogs helping with food sources, hunting dogs with wildlife control, guard dogs with security, all these dogs support us to live better, greyhounds only support monetary gain and gambling addictions. They are better than this, deserve better, and should be free from degrading practices solely for profit.”

Several respondents were of the view that a ban on greyhound racing would also end an avenue of gambling and help to mitigate the negative effects of gambling addictions felt by many individuals, families and communities across Scotland.

Public support, ethics and societal perception

Other reasons given for fully supporting a ban included a belief that a majority of the public in Scotland supported a ban. Several respondents noted that a petition² in the Scottish Parliament calling for a ban on greyhound racing is the most signed in the history of the Parliament, receiving 28,764 signatures and that a subsequent call for views on the petition by the Parliament's Rural Affairs, Islands and Natural Environment Committee saw almost 92% of respondents in favour of a ban.

Many respondents fully supportive of a ban believed greyhound racing to be outdated – something that was previously acceptable, like many other practices and past times, but that has no place in modern society, which has developed an increased understanding and respect for animal welfare. Many respondents thought greyhound racing should have no place in a modern, compassionate, ethical Scotland.

Many respondents stated that racing greyhounds to support gambling activity was unethical. Many noted that greyhounds love to run, but not to race around oval tracks packed in with other dogs for monetary reasons. The response by the organisation Almost Home commented on issues of ethics and morality, and outlined the societal moral responsibility it believed existed to protect, educate and socialise children, stating:

“Racing websites advertise their activities as “a family fun day out”, encouraging families to attend and depicting children posing under a “betting” sign and at the track side. This exposes children and young people to witnessing distressing scenes such as dogs suffering injuries and possibly being killed. God forbid that they discover the conditions in which some of them are kept, are transported and are ‘disposed of

² [End greyhound racing In Scotland - Petitions \(parliament.scot\)](https://www.parliament.scot/petitions/end-greyhound-racing-in-scotland).

when they are no longer winning those races they have just been watching. These children and young people are learning both that animal cruelty and abuse is acceptable and that betting and gambling is an activity to be encouraged. The links between witnessing or engaging in cruelty to animals as children and aggressive tendencies in adulthood have been well documented. Many studies and pieces of research have been published, identifying the correlation between childhood animal cruelty and the later development of violent traits ... it is MORALLY WRONG to stand by and allow these sentient animals to suffer.”

Reasons for partial support

Reasons given for partial support included a respondent who supported a ban but was concerned about the impact a ban would have on the welfare of current racing greyhounds. They stated that the proposed bill should ensure that such greyhounds are properly looked after.

Concern was also expressed that illegal racing may take place as a result of the ban which would be difficult to manage, while another partially supportive respondent thought increased regulation may help improve welfare issues. Another respondent thought not-for-profit racing could be permitted, rather than a blanket ban, and another thought that lure coursing³ demonstrated that safe greyhound racing may be possible if the circumstances were right.

Reasons given for opposing a ban on greyhound racing in Scotland

A small minority of respondents, 12%, fully opposed a ban on greyhound racing in Scotland. Reasons given by those fully opposed to the proposed ban on greyhound racing in Scotland included:

- greyhounds enjoy racing and it is important for their health and wellbeing;
- managed racing allows greyhounds to run in safe and managed conditions;
- racing greyhounds are well cared for and racing is well managed and subject to appropriate regulations and guidelines;
- there is a lack of impartial evidence (with some suggesting that there is a misunderstanding of greyhound racing by those proposing a ban, with misinformation being spread) to demonstrate a ban is a proportionate response;
- a preferred approach to improving the welfare of racing greyhounds would be improved regulation/licensing rather than an outright ban;
- a ban is not proportionate given there is only one hobbyist track operating in Scotland and no desire to open any new, more

³ It is understood that lure coursing is considered to be involve dogs chasing, rather than racing, on flat, straight fields, rather than oval tracks, and not to involve any betting activity.

- commercial, tracks (one respondent described the proposal as using a sledgehammer to crack a nut);
- it would not be fair to ban greyhound racing and not address other animal sports, such as horse racing;
 - banning would see to a decline, and possible extinction, of the greyhound breed;
 - banning racing could result in racing take place illegally in unsafe and unmanaged conditions, posing greater risk to greyhounds;
 - greyhounds make good pets because of racing;
 - greyhound racing has a long history in some communities and is of historic, social and cultural importance;
 - the proposed Bill would be a waste of the Scottish Parliament's time given the very small number of people it would affect;
 - greyhound racing has made significant improvements in recent years in terms of welfare and should be given more time to continue that work.

Several respondents detailed their personal experience of working/being experienced in greyhound racing and expressed frustration at what they perceived as a lack of understanding by supporters of the proposed ban about the realities of greyhound racing in Scotland. A few respondents called on the Member in charge of the proposal to visit the remaining track at Thornton and meet those involved. Individual respondent Daniel Alcorn (ID 237539305) stated:

“Greyhound racing is a working man’s sport which I have been involved in for 22 years (since I was 8) my passion in life is my racing greyhounds and if this disappears I don’t think there will be a purpose in life for myself”.

And individual respondent David Hendry (ID 237542809) noted:

“I have been running greyhounds at Thornton race track for 40 years what I seen over the years greyhounds are treated as pets by 90 per cent of owners and treated better than any dog running at GBGB tracks”.

Individual respondent Paul Koller (ID 237548941) stated:

“I get very frustrated by the misinformation put around by the anti racing brigade, often using information which is incorrect or out of date, who quite clearly have no knowledge about how greyhounds are looked after, trained, fed and treated. We have a kennel full of happy dogs. Sadly the ignorance of the anti racing brigade, spread by the media looking for a controversial story, has been seized upon by politicians who have failed to actually go out themselves and visit a racing kennels to actually get the facts for themselves. Thankfully in Westminster there is an all party group of MPs who have made the effort to find out the facts for themselves and actually support the sport. Sadly it seems that Scottish politicians have not taken the opportunity

to do so and are prepared to make a decision based merely on here say.”

Many respondents who were opposed to the proposed ban believed (while acknowledging that there is an element of risk in most activities) that greyhounds liked to race and that racing provided them with a safe and well managed environment in which to do so. Individual respondent Ryan Conneely (ID 237547234) stated:

“Greyhounds love to race and enjoy the stimulation it gives them. It is healthy for them. They are kept and looked after better than your average pet with regular exercise, dental treatment and fed good quality food. Yes there are a small number of bad apples within the sport but there’s are becoming fewer and fewer and should not let them tarnish the good work the majority of people within in the sport do. Do we ban people from owning pets next because some people mistreat their pets?”

An anonymous respondent (ID 237549574) suggested that the focus of proposed change should be on those who do not properly care for racing greyhounds, rather than preventing responsible owners and racers who care for their greyhounds from being involved and denying greyhounds the opportunity to race, stating:

“Of course, any industry related to animal husbandry, contains a small number of individual people who do not provide the care that these fantastic animals deserve. That is where the focus of the Scottish Government's attention should be. Greyhounds love to run and chase more than anything else. As someone with a retired greyhound at home, I know just how much my dog wants to be let loose. Unfortunately, I have lost a dog to a very serious injury when alone simply running and jinking in a field. I have never seen such an injury in the thousands of greyhound races I have watched over the past 50 years or so. Whilst traumatic, that accident will not stop me from letting my current dog off the leash occasionally. The enjoyment he gets from these runs has to take precedent over the relatively small risk of injury. And that is not to say injuries on the track do not happen. Of course they do. But the real issue is not the track or even racing, it is simply that greyhounds free running off the leash are, because of their speed and agility, more prone than slower dogs to injury. Flat, well maintained sand surfaces are, in my opinion, much safer than grass fields or parks - with uneven surfaces and a myriad of hidden dangers. Banning racing greyhounds on tracks, on welfare grounds, makes no sense whatsoever unless it is also made unlawful to let greyhounds off the leash in any outdoor setting.”

A few respondents who were fully opposed to the proposed ban acknowledged and accepted that there are welfare issues which need to be addressed but believed that should be done by means other than a ban. Individual respondent Katharine Mackay (ID 237907251) commented that:

“The welfare concerns underlying the proposals are genuine but to be effective, the root causes need to be addressed. The principal root cause is failure of the big bookmakers, who profit most from greyhound racing, to make a fair contribution to track safety and welfare over many years, except under duress. That needs to be addressed. The regulation of greyhound racing is relatively recent and while it has made significant progress, particularly in the last 10 years, a great deal more needs to be done. An underground, unregulated industry has the potential to exacerbate welfare issues.”

Reasons given by respondents who indicated they were partially opposed to the proposed ban, neutral, or who indicated that they did not wish to express a view, included that the outcome of the Scottish Government’s recent consultation on licensing of activities involving animals, which included a proposal to extend the 2021 statutory animal licensing framework to include greyhound racing, should be seen and considered first. Other reasons for partial opposition included that greater regulation should be considered rather than a ban, that greyhounds enjoy racing, and many involved look after the greyhounds well and a ban may therefore be disproportionate. A similar view was expressed by the only respondent who expressed a neutral view on the proposal - David Williams (ID 242083762) – who stated:

“I know nothing about racing or how the dogs are treated. I assume some will live with owners but others in kennels. If racing is banned will greyhounds still be bred? It would be a great shame if they were not because our experience of them is so rewarding.”

Question 2: Do you think legislation is required, or are there 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

783 respondents answered this question. 657 respondents (84% of those who answered this question) thought legislation was required to achieve the proposed bill’s aims. 98 respondents (13% of those who answered this question) thought legislation was not required, and 27 respondents (3.5%) did not wish to express a view.

Analysis of the responses to this question highlighted that a number of respondents had misunderstood the meaning of the question. For example, it was clear that some respondents who opposed the proposal in general interpreted this question as asking if other regulation (such as licensing) was required rather than legislating for a ban. In the paragraphs that follow we

have quoted respondents in accordance with support or opposition indicated by the content of their written response rather than the box ticked.

Legislation required

A large majority of respondents (84%) thought legislation was required to deliver a ban on greyhound racing. The vast majority of those who believed legislation was required, restated their support, and reasons for, banning greyhound racing in Scotland. They stated their belief that only an outright ban and the creation of an offence of racing a greyhound in Scotland would deliver the policy aims of the proposal, and protect greyhounds from potential injury, trauma and death. Many such respondents believed that self-regulation by the greyhound industry and/or track owners had failed and been proved as ineffective. Some also stated the view that legislating in ways other than a ban, such as by introducing a licensing scheme, would continue the current situation and would fail to properly protect greyhounds.

The Scottish SPCA was one of many respondents which outlined opposition to licensing as an alternate to banning greyhound racing, stating:

“It is the belief of the Scottish SPCA that the licensing of greyhound racing in Scotland will not tackle the welfare issues caused to greyhounds through racing. Shawfield was a licensed premises, and the number of injuries and deaths at Shawfield was unjustifiable ... If you licensed the activity of Greyhound Racing in Scotland then we as a nation are stating that this sport is acceptable despite knowledge of the animal welfare risks involved and there would be nothing to stop other tracks being opened up in Scotland in the future.”

Dogs Trust had a similar view, stating:

“Dogs Trust believes that legislation is necessary to end greyhound racing in Scotland ... We are clear that licensing of the industry is not the answer whether that is by the GBGB or local authorities. It does not solve the issue at the heart of the industry and cannot protect dogs from the inherent risk of racing ... it is important to note that for each and every greyhound to experience a *good* life from birth to death, widespread reform of the industry would be needed. Such reform includes independently funded regulatory oversight, a consistent and secure income stream and an industry-wide transition to racing on straight tracks. We do not believe that such wholesale reform is achievable, given the multinational and disparate nature of the industry.”

One anonymous individual (ID 243563285) stated that regulation and self-governance had been proven to be ineffective in preventing harm to greyhounds, and that there is no evidence or reason to believe that further regulation, including a licensing scheme, would be any more effective. The anonymous respondent (ID 243563285) stated:

“Legislation to license trainers or tracks will not impact excessive numbers of greyhounds bred, nor will it sufficiently address the hazards caused to greyhounds through oval track racing ... Licensing trainers and/or tracks will neither address nor resolve the systemic harms caused by the institution of greyhound racing.”

Legislation not required

A small minority of respondents (13%) did not think legislation was required.

A number of respondents who were opposed to the overall proposal, thought legislation to ban racing was not required as a consequence, and restated views in opposition to the proposal to ban greyhound racing (see question 1) when answering this question. Common themes were that greyhounds enjoy racing and that greyhound racing is safe and well managed (essentially self-regulating by experienced people) and already sufficiently and appropriately regulated and managed. Some of these respondents stated that the GBGB ensured appropriate regulation and governance was in place⁴.

Some respondents thought legislating to end greyhound racing in Scotland was not necessary or proportionate as there is currently only one, independent track currently operating in Scotland, on a small, hobbyistscale. Some thought that legislating was therefore disproportionate and one individual respondent, Alistair Barr, (ID 237546749) believed that greyhound racing was naturally ending in Scotland in any case due to a lack of interest amongst younger people and changing views on animal welfare.

Some respondents thought that any issues could be dealt with by further regulations, such as the introduction of a licensing scheme, rather than by legislating for a ban on racing. Individual respondent Graham Wells (ID 238397559) commented that, “Licensing and greater controls would be a much better option”, and one anonymous respondent (ID 238376671) stated:

“Anything to do with animals should be monitored and controlled. Licensing will ensure that there is a register of all people or organisations involved.”

A vet, Mark Johnston (ID 240946016), stated:

“Better regulation of tracks, trainers and advances in track design could undoubtedly improve conditions for racing dogs and reduce injury rates but this blunt instrument, which makes it illegal to race a dog, is not the way to go.”

⁴ Note that the one greyhound racing track currently operating in Scotland is an independent track and is not managed by the GBGB.

However, the organisation SHG (ID 243124169), which was opposed to the overall proposal, also set out why licensing (as an alternate to a ban, which it did not support) was not required, stating:

“If animals are transported or kept in unsuitable conditions or trained in welfare unfriendly manners then the people responsible can be prosecuted. How will licensing improve or alter this? Occasional inspections will not do any more to highlight these issues. Keeping any racing greyhound in sub-standard conditions or failing to cater for its welfare needs is certainly not conducive to a successful racing career.”

Question 3: 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 / Partially opposed / Fully opposed; Do not wish to express a view).

Please explain the reasons for your response

784 respondents answered this question. A significant majority of respondents (607, 77% of those who answered) were fully supportive of the proposed penalties for committing an offence of using or permitting the use of greyhounds for racing in Scotland, with a further 63 respondents (8%) partially supportive. A small minority of respondents (89, 11%) were fully opposed to the proposed penalties, with a further six respondents (0.8%) partially opposed. Nine respondents (1%) were neutral and eight (1%) did not wish to express a view.

Supportive of the proposed penalties

Many of the reasons given restated views given in support of the proposal as a whole under questions 1 and 2. These included support for the proposed penalties due to the perceived threat racing poses to the welfare of greyhounds and therefore the need for an offence of racing greyhounds which carries sufficient deterrents to ensure that people are not tempted to break the law.

Many of those supportive stated that the creation of an offence of racing greyhounds in Scotland would be ineffective without sufficient and appropriate penalties being in place to support it. One individual, Morag Jane Weir (ID 237462574) captured the views of many in stating, “Unless there are strict consequences, nothing will change”. Another individual, Michael Rozdoba (ID 240632708), stated:

“Penalties must be proportionate & consistent. The state cannot be seen to be unreasonably punitive without harming the society it is meant to represent, but equally, inadequate penalties which commercial industry can simply budget for are no deterrent; rather they become a taxation on abuse, which is tantamount to endorsement & profiting from said abuse. Your proposals appear to reflect what our society considers reasonable as disincentive to the abuse of sentient animals.”

Greyhound Rescue Wales (ID 243113051), which was fully supportive of the proposed penalties, stated:

“... the proposed penalties set out in this draft legislation, will in GRW view properly reflect the intensity of society’s repugnance [of illegal greyhound racing] and will hence provide an appropriate level of deterrence. Making the costs of offending too high for the majority of existing law-abiding racing dog owners and race goers. The proposed ban and penalties, alongside existing legislation, will then provide the tools necessary to suppress and punish those who might choose to engage in illegal greyhound racing.”

Another common theme among respondents fully supportive of the proposed penalties was a concern that, if illegal, greyhound racing would continue in Scotland in an “underground” capacity, i.e. via secret/covert, privately organised races which would pose an even greater risk to the welfare of racing greyhounds. The proposed penalties, allowing for maximum statutory fines and up to 5 years in prison, were deemed necessary by many respondents to prevent people from organising “underground” races as the risk would be too high given the extent of the penalties if a person was caught, charged and convicted.

Several of those fully supportive of the proposed penalties, including some of the organisations which responded, were supportive of the proposal to align the penalties with those in relevant parts of the Animal Health and Welfare (Scotland) Act 2006 relating to preventing unnecessary harm and to animal welfare. Several respondents noted that they believed the offences in the 2006 Act and the offence of racing a greyhound in Scotland, once prohibited, were comparable in terms of the negative impacts of the activity on the animal and the seriousness of the offence and proportionate penalties.

Varying the proposed penalties

Many respondents suggested changes to the proposed penalties. This included respondents who indicated they were fully supportive, partially supportive, neutral, partially opposed, and fully opposed to the proposed penalties, and some of those who indicated that they did not wish to give a view.

Sixty-three respondents (8%) were partially supportive of the proposed penalties, many of whom supported the creation of an offence but disagreed with aspects of the proposed level of penalties and/or suggested further/alternate penalties and/or courses of action. A small proportion of those who indicated they were fully or partially opposed to the proposed penalties were supportive of the overall proposal to prohibit greyhound racing in Scotland (and therefore the creation of an offence).

Comments/suggestions made regarding the proposed penalties included that:

- the penalties should include being able to prohibit a person from keeping or breeding a greyhound/any dog;
- a prison sentence should be mandatory for every conviction under the offence;
- a prison sentence was not appropriate for the offence;
- the penalties (maximum fines and/or prison sentence) proposed should be higher and/or considered as a minimum, rather than a maximum penalty;
- other alternatives should be considered for those convicted, such as community service and education programmes;
- the offence should be widened to include other breeds of dog, such as whippets.

GREY2K USA Worldwide⁵ (ID 242032845) indicated partial support, stating that it supported the penalties, but adding:

“We believe penalties for committing a crime must act as a deterrent to prevent offending, however in the case of greyhound racing we believe restrictions on owning, breeding and training dogs for offenders would indeed be the best deterrent, and believe this should also be considered alongside imprisonment and fines.”

Scotland for Animals (ID 243650774) stated:

“Penalties are inadequate. There must also be an overhaul of attitudes towards enforcement, enthusiasm for which appears to be lacking on the part of authorities with regards to existing relevant legislation.”

Some respondents were supportive of fines being imposed but either thought that a maximum term of 5 years imprisonment was too long, or that no prison sentences should be given at all.

Several respondents thought that, rather than a prison sentence, a more appropriate response would be a form of education and/or community service. One anonymous individual (ID 243672776) stated:

⁵ In its submission GREY2K USA Worldwide⁵ (ID 242032845) described itself as the “largest greyhound protection organisation in the world”.

“I do not support the prison system. Fines amongst other penalties, education classes, mandatory service at animal shelters, could bring long lasting solutions and potentially be more impactful. Which may also contribute to educating offenders, that may lead to less or ideally no future repeat offenses.”

One anonymous respondent (ID 237441037) thought prison sentences were inappropriate and recommended mandatory education, such as working in greyhound rescue centres, as an appropriate course of action for a person committing the offence. Another individual, Lesley Halm (ID 240973387) stated:

“I agree that grave penalties should be put in place for such antisocial and harmful, cruel behaviour, but I don't support imprisonment except in the most necessary situations. I think that people who are caught causing animals harm should be made to pay a fine, which should be then put towards paying for animal shelters, and these offenders should then, instead of imprisonment, have to work in animal shelters or animal rescue programs for the term proposed for their imprisonment, rather than taking up taxpayers' money to intern them. These offenders should be educated, and should atone for their wrongdoing, not forced into situations where they are likely to learn to be worse human beings than they already are. This is the only way that we will create a better society. By educating people -- by giving them opportunities to better themselves -- not by traumatising them further and pushing them socially and politically further away from the possibility of becoming a better and more stable member of society.”

And James Todd (ID 237801097) stated:

“Sanctions and fines would be most appropriate. Recent news items suggest that prisons are overpopulated so further incarceration would not help anyone. Checks, monitoring and suitable fines, confiscation of assets and paraphernalia related to racing would help reduce opportunities for reoffending.”

In contrast, some other respondents thought that prison sentences should be longer, and/or should be given for every conviction. One individual, Michelle Hayward (ID 241368658) stated:

“I would like to see the 5-year term and maximum financial penalties given for all offences. We know that many people involved in the greyhound industry are unscrupulous and likely to be involved in illegal activities such as hare coursing, and other wildlife crimes and persecution ... They must be made an example of from the start.”

Julia Macbeth (ID 237378276) stated, “I feel that imprisonment is a more suitable deterrent for crime than a fine in an industry that profits from gambling”, and Zoe Louise Doyle, a zoologist, explained the reason for her partial support as follows:

“I don't think there should be a cap on the maximum time served. Time served should be judged on a case by case, and increased when evidenced suggest offender is part of a more organised scheme or has repeatedly broken law.”

Opposed to the proposed penalties

Eighty nine respondents (11% of the total number of respondents who responded to this question) were fully opposed to the proposed penalties, with a further six respondents (0.7%) partially opposed. A small number of these were supportive of the proposal overall but did not agree with aspects of the proposed penalties.

A large majority of those fully opposed to the proposed penalties were opposed to the overall proposal and stated that as they were opposed to the proposed prohibition of greyhound racing, they therefore did not think any offence should be created at all, and that there should be no penalties.

There was an overlap of the reasons given in response to this question by those opposed and those given to questions 1 and 2 – such as questioning why greyhound racing would be prohibited and horse racing would not, stating their belief that greyhound racing was not cruel, was enjoyed by the dogs, was safe and well regulated, and that a prohibition would lead to dogs still being raced, but in an “underground” way – i.e. in a hidden, secret, and therefore less regulated and less safe way.

Many of those opposed to the proposal as a whole, and also opposed to the proposed penalties, stated that the penalties were draconian and unjustifiable and that potentially imprisoning a person for racing a greyhound was disproportionate and would increase overcrowding in prisons.

An individual respondent James McGee (ID:237448456) stated in relation to the proposed offences:

“An overreaction response for something that has been not only popular, embedded in culture and legal for 100 years. A community service order would be more appropriate. No fines, no prison terms.”

Another individual respondent, Stefan Wells highlighted that the proposed penalties would result in different treatment for horse racing and greyhound racing which he equated:

“This is a joke. Racing dogs is a perfectly legal. How come no proposal to penalise people racing horses? There is no difference. Complete hypocrisy.”

A number of respondents opposed to the penalties on the basis that they were excessive contrasted greyhound racing with violent crimes which they thought had a similar level of sanction. William Watson (ID 238439725) stated:

“What a piece of nonsense this is and a total waste of taxpayers’ money. You’d be better going out and catching real criminals not people who are only participating in a hobby.”

Alistair Barr (ID:237546749) held a similar view, stating:

“There are 99 out of 100 crimes which are far worse in this day and age than performing a hobby of greyhound racing and is a prime example of people who know nothing about greyhound racing, owning and training getting involved in something in which has been over exaggerated for their own circumstances.”

Resource implications

Question 4: Taking into account all those likely to be affected (including public sector bodies, businesses and individuals etc), 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 the 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

766 respondents answered this question. Almost half of those (356 respondents, 46%) selected the option to skip to the next question, and a further 20 respondents did not give any response to the question at all. Of those who selected a substantive option, the most selected response was that the proposed bill would lead to no overall change in costs (167 respondents, 22%). 125 respondents (16%) thought there would be some increase in costs, with a further 48 respondents (6%) thought there would be a significant increase in costs. 34 respondents (4%) thought there would be a significant reduction in costs, with a further 36 respondents (5%) believing there would be some reduction in costs.

No overall change in costs

22% (167 respondents) of those who answered this question thought the proposed bill would lead to no overall changes in costs for anyone likely to be affected. Reasons given included that:

- there is only one greyhound racetrack is operating in Scotland, and on a small 'hobbyist' scale, so prohibiting greyhound racing will not have a significant financial impact;
- any costs incurred by ending racing in Scotland (such as loss of employment, revenue etc.) will be balanced by costs involved in rehoming and caring for ex-racing greyhounds, and savings such as a reduction in vet's expenses and any investigations and prosecutions relating to racing activities;
- once existing racing greyhounds are rehomed there will be no need for future care/rehoming for racing dogs, as no dogs will be racing;
- given the small scale of greyhound racing in Scotland, and the unlikely occurrence of illegal racing, prosecution levels for the offence created are likely to be low.

Scotland Against Greyhound Exploitation (SAGE) (ID 243332422) stated:

“The timing of this bill is such that the financial impact of its implementation is at the lowest possible level. There is only one track left operating in Scotland and is a self-described “hobby track”, operating on average twice per month. The track owner advised the Rural Affairs and Islands committee in 2023 that those attending the track are only people directly involved in racing (trainers, owners, bookmaker) – i.e. it does not attract the general public as an entertainment venue. With no full time employees, it is positive to note that the closure of this last remaining track would not impact on any individual's livelihood. There would also therefore be no financial impact felt by the local economy by the loss of racing at this track. The implementation of the proposed legislation would fall to the SSPCA and Police Scotland and their existing resources. We would anticipate however that there is an extremely low likelihood of there being any meaningful attempts to carry out illegal racing should the legislation pass ... As such, we assert that little or no resources will likely be expended on the enforcement of this legislation, and instead we anticipate that should the bill pass, greyhound racing will cease all together.”

Many other individual respondents made similar points to those expressed by SAGE, such as:

“Greyhound racing has all but phased itself out in Scotland, that's why this is the perfect time to implement legislation to prevent it returning. As I understand it Thornton is said to be a hobby track with no financial incentive to either facilitate or participate in the races. Dogs are described as family pets, if this is so then there should not be any rehoming needs. There are very few people left in Scotland who race greyhounds and the only ones doing it professionally race at tracks in

England. There is no economic reason i can see for continuing racing.” (Individual respondent Jacqueline Brown (ID 241366092)).

And:

“I think that given there is only one self professed “hobby track” left in Scotland now, the financial impact of this bill will be negligible. There are no individuals full time employed in greyhound racing in Scotland, therefore no livelihoods will be lost. Additionally, the cost to the public of implementing this legislation will be low, and any subsequent instances of illegal racing would be dealt with by the SSPCA or police Scotland under their existing powers. Bringing this legislation now, at a time where commercial greyhound racing has already ceased in Scotland means the impact will be as low as possible to the public.” (Anonymous individual ID 243304104).

The Dogs Trust predicted no overall change in costs in the long term but noted that costs would increase initially due to the need for current racing dogs to be rehomed. The Dogs Trust noted that there was a spike in in the number of greyhounds which came into its care following the closure of the last remaining licensed track in Scotland in 2020 and thought that may happen again should the currently operating track close as a result of the proposed ban.

Greyhound Racing Wales gave a detailed analysis of the economic contribution/impact of greyhound racing, both in the UK, and in parts of the UK, and compared the situation in Scotland with that in Wales, in terms of the scale of racing activity. It concluded that, “a ban will have little if any real impact on the Scottish economy”. More detail can be found in the full response by Greyhound Racing Wales.

Significant/some increase in costs

One hundred and seventy three respondents (23% of those who answered this question) thought there would be an increase in costs as a result of greyhound racing being prohibited in Scotland. 48, 6% of those who answered this question, thought there would be a significant increase, and 125, 16% of those who answered this question, thought there would be some increase.

A proportion who thought there would be an increase in costs were opposed to the proposed ban on racing, and set out losses that would be incurred as a result of the proposed bill, such as losses incurred by the existing greyhound track in Scotland (in terms of loss of employment and any revenue), and losses involved in a reduction in gambling including losses for bookmakers which would potentially result in bookmakers paying less tax.

Others who predicted an increase in costs believed that costs would increase for the police, other investigators (such as the SSPCA) and the criminal justice system more generally as a result of policing the new offence and the cost of resulting prosecutions and convictions. Some also predicted that costs

would increase for organisations required to provide welfare for greyhounds rather than by the owners and managers of greyhound tracks.

One individual respondent, Katharine Mackay (ID 237907251) stated:

“Welfare costs are currently borne at part by trainers, owners, tracks and bookmakers. Welfare costs may or may not be reduced by driving the industry underground, but they will fall wholly to the public and charitable sectors at that point”.

Another anonymous individual (ID 241738408) also commented on this issue:

“Financial support should be given to rehoming charities who will be left to deal with the increase in dogs requiring rehoming - it is important that trainers are required to rehome through charities to ensure no dog is abandoned or destroyed illegally.”

The SSPCA (ID 241402870) predicted some increase in costs overall, noting that there would be savings for those who keep greyhounds currently only for racing (due to no longer having to feed, kennel, transport or provide medical care for the greyhound) but an increase in costs for organisations who seek to rehome racing greyhounds. The SSPCA also noted that a local authority licensing scheme has been mooted as an alternative to a ban, and that such a scheme would result in increased costs to relevant local authorities.

Significant/some reduction in costs

Seventy-two respondents thought there would be a reduction in costs as a result of banning greyhound racing in Scotland. 36 respondents, 5% of those who answered this question, thought there would be a significant reduction in costs, and 34, 4% of those who answered this question, thought there would be some reduction in costs.

A majority of those who predicted a reduction in costs believed that a ban on racing would mean costs associated with racing would end – including costs of training and transporting greyhounds and facilitating rehoming, and managing venues (including staffing and vets costs).

Individual respondent Prasad Pattnaik (ID 241374852) stated:

“A complete ban on greyhound racing would simply lead to greyhounds being treated just like other dogs (i.e. household pets). Public sector bodies and businesses currently have to deal with everything associated with the transport of greyhounds, policing/stewarding of stadia, emergency veterinary care, etc. These costs would no longer be there. As a result, there would be an overall reduction in costs.”

Individual respondent Fiona McGregor Nicholson (ID 241825970) focused on the reduced costs for public sector bodies, commenting:

“There should be no increased costs for public sector bodies and organisations as the enforcement of this legislation is nothing more than these bodies should have been carrying out under current welfare laws had they observed due diligence over the many decades that this corrupt industry has been permitted to operate under 'self-regulation'. Indeed, the wasteful cost of providing welfare inspectors who never did anything to improve the situation or to send the abuse, will no longer be incurred. Nor will the costs of police picking up abandoned greyhounds or investigating any cases of reported cruelty linked to the industry be incurred, another public sector saving.”

Many focused on reduced costs for third sector organisations and individuals involved in caring for and rehoming racing greyhounds. Individual respondent, Georgina Cairns (ID 242601357) set out the potential for welfare savings, particularly for third sector organisations, in detail, stating:

“As someone who has been involved in greyhound rescue and rehoming in Scotland for many years I foresee major cost savings associated with ending racing in Scotland. Ex-racing greyhounds come into rescue with significant health issues. The most frequent are dental issues, but racing-related musculoskeletal are also very common. I have also fostered a number of dogs with chronic disease issues such as blood clotting disorders. All prior injuries and illnesses required to be identified, investigated and treated before the dog can be adopted into a permanent home. All dogs are also routinely neutered, given prophylactic treatment for worms, ticks and fleas when they come into rescue. Funds also need to be found to cover the costs of food, warm and rainproof coats and transport. Volunteers give their time to collect dogs, look after dogs, home check potential adopters, introduce the dogs to life in a home and of course fundraising for free. The donations made by the racing owner and the adopter only partially cover these costs. The average cost of a rehome has been estimated to be around £1000/dog. The racing industry does not seem to recognise their responsibility to cover these costs whilst simultaneously claiming that homing as a companion animal is the natural route for most of the greyhounds raced when they are deemed to be no longer suitable for racing. So I see a significant saving in charitable income when greyhounds are bred and kept as companion animals from the outset instead of being used as racing commodities for the first short period of their life when so much of the (avoidable) illness, injury, and social isolation occurs.”

Individual respondent Luke Ito (ID: 242863770) also highlighted that costs may be reduced as a result of the proposed ban:

“The cost of greyhound racing is being borne by individuals and organisations who take care of the dogs after they are rescued from the sport. This would be significantly reduced with a ban on greyhound racing by eliminating the costs of rehoming, rehabilitation and

treatment of injuries incurred on the track”. (Response no, SS ID: 242863770, Luke Ito)

A joint response by Professor Marie Fox and Dr Sarah Singh, University of Liverpool Law School (ID 243673265) predicted some reduction in costs overall, acknowledging there would likely be “... some impact on operators, trainers, attendees, and bookmakers of any operating racetrack involved if it is forced to close in consequence of a ban”, adding that “... since only one unlicensed greyhound racetrack in Scotland is currently operational, such impact is likely to be small.” The response also notes a marginal increase in policing and prosecution costs may occur. In terms of gambling, the respondents note that gambling is now less localised, and is increasingly global and online, and that therefore, from a gambling perspective, virtual animated racing was a suitable replacement for greyhound racing. Professor Fox and Dr Singh conclude by stating that any minor increased costs will be significantly offset by the relief of the burden on rescue centres.

Equalities

Question 5: 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? If you do not have a view skip to next question.

(Positive / slightly positive / neutral (neither positive nor negative) / slightly negative / negative / do not wish to express a view).

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

714 respondents answered this question. 229 respondents (32%) thought that the proposed bill would have a neutral impact on anyone with a protected characteristic; 212 respondents (30%) thought it would have a positive impact, with a further 10 respondents (1%) indicating it would have a slightly positive impact; 65 respondents (9%) thought it would have a negative impact, with a further 12 respondents (2%) believing there would be a slightly negative impact. 186 respondents indicated that they did not wish to express a view.

Positive impact

A significant majority of those who thought the Bill would have a positive impact on equalities and some of those with protected characteristics outlined expected positive impacts on greyhounds (by reducing injury, trauma and potential fatality), and on wider society, including by helping to reduce avenues for gambling and helping to tackle instances of gambling addiction.

Some of those who thought there would be a positive impact on equalities believed the proposed bill could have a meaningful consequential symbolic effect on those with protected characteristics. One individual respondent, Elaine Le Geyt (ID 237567239) stated:

“I think that ALL cruelty in society has a knock-on effect. All minority & marginalised groups in society will recognise, in the passing of this Bill, that cruelty & disrespectful behaviours will not be tolerated in Scotland.”

Another individual, Natasha Susan York (ID 240632628) stated:

“The underlying values of justice, equality, inclusion and compassion which led to the equality act and the protected characteristics should apply to all aspects of our society. By banning a cruel and exploitative industry, we would send a message to everyone, but particularly people with protected characteristics, that we truly care about those values and are not just paying lip service to them.”

Two respondents predicted a positive impact on younger people in particular as a result of demonstrating that cruelty to animals would not be tolerated. Anonymous respondent ID 243677430 stated:

“I also believe the proposal could have a positive impact on the wellbeing of young people and children, as they will no longer be exposed to any negative impacts on their wellbeing as a result of seeing an animal suffering an injury or fatality during a public racing event.”

One individual respondent, Georgina Lyng (ID 242054488) noted a potential positive impact on a person with autism, stating:

“Autistic people in particular are traumatised by animal cruelty and exploitation, so a ban would provide huge mental health benefits to those individuals. (I am autistic myself and I find all kinds of greyhound and horseracing on TV very emotionally traumatic, especially when we see or read about horses and greyhounds that have been killed or injured on the tracks. It’s really not acceptable. We live in 2024, we should know better and can DO better !”

Neutral impact (neither positive nor negative)

229 respondents (32% of those who answered this question) thought there would neither be a positive or negative on equalities – the most selected of all the available options. Many respondents noted that the proposed bill would mostly effect greyhounds rather than particular groups of people, and that the proposal would not impact on anyone because of a protected characteristic in a particular way.

Others who selected this option indicated support or opposition to the overall proposal in explaining their answer.

Negative impact

Many who indicated there would be a negative impact on equalities and some of those with a protected characteristic were opposed to the proposal as a whole and outlined the negative impact on either the industry (in economic terms) or on themselves personally (in terms of being deprived from participating in an activity they enjoy, use as a social outlet, and consider good for their own wellbeing/mental health).

Some respondents stated that the proposed bill would disproportionality impact more on working class people.

One respondent, Alistair Barr (ID 237546749) suggested a negative impact would be felt by those aged 60 and over in particular as greyhound racing is mostly enjoyed by older people.

Sustainability

Question 6: 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? (If you do not have a view then skip to next question)

(Yes / No / Do not wish to express a view).

730 respondents answered this question. A majority of respondents, 387 (53%), believed the proposed bill could impact on work to protect and enhance the environment, achieve a sustainable economy, and create a strong, healthy, and just society for future generations. 163 respondents (22%) believed the bill would not have a positive impact on those areas. 180 respondents did not wish to express a view.

Some of those who thought there could be an impact on sustainability issues, be that environmental, economic or societal, repeated views, in support or opposition of the proposed bill, given when answering other questions in the consultation, particularly questions 1 and 2.

Positive environmental impact

Many respondents predicted the proposed bill would have a positive impact on work to protect and enhance the environment, both in practical and in more symbolic terms. Practically, some thought that ending greyhound racing would reduce associated emissions and improve the carbon footprint of those involved in the activity, including in the operation of racetracks, and in

breeding, keeping and transporting greyhounds for the purposes of racing. Some respondents also suggested that the proposed bill would contribute positively to protecting and enhancing the environment by taking better care of greyhounds and demonstrating an increased respect and care for animals. Individual respondent Prasad Pattnaik (ID 24137485) set out a range of perceived positive environmental benefits of prohibiting greyhound racing, stating:

“Current negative environmental factors of greyhound racing include overbreeding of greyhounds, increases veterinary care due to overbreeding and injuries, transport of dogs, noise at tracks, littering in/around stadia, policing/stewarding (including their own transport) at tracks, etc. A ban would positively impact the environment.”

Positive economic impact

Some respondents believed the proposed bill would have a positive economic impact and help to create a more sustainable economy. The organisation GREY2K USA Worldwide (ID 242032845) set out perceived positive economic and societal impacts:

“GREY2K has existed for over two decades to end the cruelty of dog racing. In that time, major news outlets have continued to report on the rebirth of closed greyhound tracks for the benefit of local communities ... closed dog tracks ... have been redeveloped for housing and hotels, as well as community centres, shopping malls, sports and concert arenas, and even ice rinks.”

An individual respondent Vera Johansson (ID 242059166) stated:

“The farms that produce these hounds will no longer be taking up space with their slaughter farms. These big pieces of land could now be used for agriculture or actual farming hence benefiting the Scottish economy.”

Several responses stated that they believed there would be no negative economic impact (in terms of loss of revenue and employment) due to there only being one greyhound track operating in Scotland, and on a small scale.

Positive societal impact

Many respondents believed the proposed bill would have a positive impact in helping ensure Scotland has a strong, healthy, and just society for future generations. Many noted that the proposed bill would make Scotland a more compassionate and caring society, and set a good example, and send a strong message, to young people that animals are respected and treated with care and compassion. Some believed that the proposed bill would demonstrate an enhanced sense of human responsibility and accountability, while others noted that the proposed bill would see justice for greyhounds.

Individual respondent Georgina Barrett (ID 242092510) stated:

“A new law banning greyhound racing would help to create a strong, healthy and particularly just society for future generations, where greyhounds are no longer viewed as a commodity to overbred, used/abused and discarded simply due to their breed. This would help to create a society that treats all breeds of dog equally and stands up against the abuse of animals for greed and profit.”

Some respondents highlighted their belief that greyhound racing encourages and helps to sustain gambling activity and therefore contributes to the problem of gambling addiction. Some noted that gambling addictions can have severe negative consequence for addicts and their families (economic and health consequences), as well as for wider society, as it was suggested that gambling addiction can lead to crime and link to other societal problems such as drug and alcohol addiction.

Greyhound Rescue Wales stated:

“A ban on greyhound racing in Scotland may contribute [to] reducing problem gambling and the wide range of social dis-benefits this entails e.g. crime, child poverty, domestic violence, etc.”

Negative impacts

In terms of negative environmental impacts, a few respondents thought the proposed bill would negatively impact on the greyhound breed, leading to a decline in greyhound ownership, and possibly even to the breed disappearing. It was also suggested that the proposed bill may see greyhound racing continue in an “underground” capacity, i.e. covertly and without any regulation, which could lead to a decline in the welfare of racing greyhounds.

In terms of negative economic impacts, several respondents highlighted their belief that the proposed bill would lead to a loss of employment, as the current track in Scotland would close, and there would be no opportunity for other tracks to open. Several respondents thought this would impact negatively on the livelihood of breeders, kennels, trainers and racetracks.

With regard to societal impacts, several respondents believed the proposed bill would impact negatively on future generations by depriving them of participation in, or access to, a hobby/activity which had been enjoyed by their family and friends before them, therefore ending a way of life enjoyed by some people. A few respondents thought the proposed bill would not contribute to making Scotland a just society as it demonstrated a restriction of freedom and was a demonstration of people in power forcing their own views onto others. A number of respondents thought the proposed bill targeted working-class people, as they associated greyhound racing with working-class people.

Individual respondent Paul Koller (ID 23754894) stated:

“A ban would basically take away this sport for future generations. Greyhound racing is part of the history of the working classes in particular and it is, it seems the desire of the middle and upper middle classes to impose their views on the rest of society.”

No impact

180 respondents, a quarter of all those who answered this question, believed there would be no impact on environmental, economic and/or societal sustainability. Most such respondents did not give any further reasons for their response. Of those who did, some restated their views in support or opposition of the overall proposal. Some stated their belief that there would be no impact due to greyhound racing in Scotland being at a very low level – involving only one track operating with a very small number of workers/attendees. A small number answered “no” to this question meaning “no negative impact” and restated reasons for positive impacts covered in the summary above of reasons for perceived positive environmental, economic and societal benefits.

General

Question 7: Do you have any other additional comments or views on the proposed Bill, beyond those already covered in response to earlier questions? If so, please share here.

321 respondents answered this question (41% of the total responses received). Many of the views expressed repeated comments made previously in answering other questions, particularly questions 1 to 3. This included repeating views on why the respondent was in favour or opposed to the proposal to prohibit greyhound racing in Scotland.

Other comments made included that:

- the proposal should apply to other breeds of dog, not just greyhounds;
- the proposed Bill would not be a good use of the Scottish Parliament’s time;
- the consultation document was full of misinformation;
- that the proposal afforded Scotland an opportunity to lead the way in the UK and perhaps encourage other parts of the UK to also ban greyhound racing;
- consideration needs to be given to potential consequences of the proposed bill, including how greyhounds will be suitably cared for and rehomed.

The responses to this question contained a significant number of further personal accounts by people who own, or have owned, rehomed and/or retired racing greyhounds. Examples include:

Anonymous individual (ID 241799362): “I rescued and I mean rescued 2 greyhounds. One from Greyhound Rescue Fife and one from Dogs Trust. Both were emotionally scarred their whole lives.Scared of people, particularly men with walking sticks funnily enough. Not housetrained, difficult with other breeds due to lack of early exposure, eating like every meal is their last for the first several years before realising they were home and safe for ever. Terrible teeth random research would indicate that this is a common concern and based on poor feeding and nutrition as puppies.Scotland must take the lead on this dying practice and allow those involved in rescuing and rehabilitating these dogs to help other dogs, as there are way too many dogs in general and this just feeds this problem.”

Individual respondent Kathleen Doggett (ID 242607854): “It is very clear to me that greyhound racing should be made illegal. As an owner of several retired ex racing greyhounds it is clear that their racing years have had detrimental effects and have impacted significantly on their subsequent lives. The high speeds and stress while racing around a track produces very high pressure on all parts of the anatomy. This is particularly true on the muscles and joints of the legs in particular. Apart from the time they are racing , greyhounds have no experience of the outside world or of a normal dog life. Several of my dogs have been extremely nervous and frightened of men in particular. They are also unused to other dog breeds as they have been kept only with other greyhounds in kennels.”

The organisation OneKind responded to this question by setting out information relating to the ‘Unbound the Greyhound’ coalition and a pledge of support for the proposed bill established by the coalition:

“In June 2023 the Unbound the Greyhound coalition was formed. 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). The Unbound the Greyhound coalition gathered signatures of people who pledged their support for this Bill. The wording of the pledge was:

“I am fully supportive of the aim of the Proposed Prohibition of Greyhound Racing (Scotland) Bill to prohibit the use of greyhounds in racing, through 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. I think that legislation is necessary to achieve that aim and am fully supportive of the proposed penalties.”

9,505 people signed this pledge.”

Section 4: Member's Commentary

I would like to thank all those who dedicated time to respond to the consultation into the proposed *Prohibition of Greyhound Racing (Scotland) Bill*. All views from all sides of the debate have been noted and will be carefully considered as part of the next steps in introducing the proposed Bill.

A significant majority of respondents were in full support of the proposed Bill, with a further 9,651 individuals indicating their support through a public pledge lodged by *Unbound the Greyhound* coalition. The outcome of the consultation underlines the widespread evidence that demonstrates the risk of injury on the bends of oval-shaped racetracks experienced by racing greyhounds at high speeds, regardless of whether these racetracks operate under a licensing scheme or independently.

The level of public concern for the welfare of greyhounds used in racing builds on pre-existing support indicated through the 29,148 individuals who signed the public petition *PE1758: End greyhound racing in Scotland*, which remains the most signed petition in the Scottish Parliament, as well as other public engagement measures such as the Rural Affairs and Islands Committee's *Call for Views* on PE1758 and the *Unbound the Greyhound* coalition's open letter to the Scottish Government which all achieved significant numbers of public support for an end to greyhound racing in Scotland.

The significant majority of respondents who were supportive of the proposed Bill, including key animal welfare organisations, highlighted the inherent risk of injury and fatality, noting that 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. A number of respondents noted the barriers with existing animal welfare legislation and licensing proposals to address the inherent risk of injury and fatality. The respondents acknowledged that despite progress toward improving welfare standards at licensed racetracks across Great Britain, the statistics available illustrate that as long as greyhounds are used for racing they will continue to suffer from the inherent risks of injury and fatality.

I note that a significant number of responses provided noteworthy evidence on the long-term health and behavioural challenges greyhounds used in racing experience long after being re-homed. I also recognise that several responses highlighted the broader animal welfare concerns relating to the use of greyhounds in racing concerning their whole life cycle, beyond injuries and fatalities at racetracks, such as welfare issues associated with the breeding, transportation, and kennelling of greyhounds. The proposal for the Bill will have consequential effects on these associated welfare concerns.

A small minority of individuals, many of whom have long-standing experience in working within the racing industry, were fully opposed to all aspects of the proposed Bill. I acknowledge that a number of respondents noted the social

benefit greyhound racing offers to individuals engaged in the racing industry, as well as the level of care some individuals personally provide to greyhounds used in racing under their care. However, respondents opposed to the proposal did not adequately address the welfare concerns associated with greyhound racing and did not recommend measures that could tackle the reported volume of injuries and fatalities. Therefore, I remain sceptical of the potential to achieve meaningful reform within the racing industry in a way that protects greyhounds used in racing from the inherent risk of injury, trauma, and fatality.

A significant majority of respondents supported the proposed penalties for committing an offence of using or permitting the use of greyhounds for racing, which would match the penalties for a person committing other offences under the Animal Health and Welfare (Scotland) Act 2006. The small proportion of respondents who were opposed to the proposed Bill were consequentially opposed to the proposed penalties and restated views in opposition of the proposal to legislate for an end to greyhound racing as a whole

I am still firmly of the view that introducing an offence of permitting a greyhound to race at racetracks in Scotland is necessary in order to promote the welfare of these dogs. I have now lodged a final proposal and subject to receiving the required cross-party support from Members of the Scottish Parliament (MSPs) I intend to proceed with introducing a Bill on this issue in the Scottish Parliament.

I would like to take this opportunity to thank the staff members from my parliamentary office for their tireless work in making the introduction of this proposed Bill possible. I would also like to thank the Non-Governmental Bills Unit (NGBU) for producing this consultation analysis document and for supporting my team and I through the parliamentary process of introducing a Member's Bill.

Mark Ruskell MSP

Annex

List of organisations

21 organisations responded to the consultation as set out below. They can be found online, along with the publishable individual response, here: [End Greyhound Racing](#)

1. Scottish SPCA
2. GREY2K USA Worldwide
3. Forget-me-not Environmental, Wildlife, Animal Protection - registered charity
4. Scottish Greyhound Sanctuary
5. Say No to Greyhound Racing in Scotland
6. Greyhound Rescue Wales
7. Irish Council Against Blood Sports
8. Greyhound Action Ireland
9. Greyhound Awareness Cork - located in Republic of Ireland.
10. OneKind
11. The League Against Cruel Sports (Scotland)
12. UK Centre for Animal Law Scottish Committee
13. Scotland Against Greyhound Exploitation (SAGE)
14. Scotland for Animals (Charity SC039109)
15. The Self Help Group for Farmers, Pet Owners and Others experiencing difficulties with the RSPCA (The SHG)
16. Almost Home
17. Forever Hounds Trust
18. Scottish Courts and Tribunal Service
19. Dogs Trust
20. Hope Rescue
21. Blue Cross