



Irish Greyhound Board

Anti Doping and Medication Control Programme of the Irish Greyhound Board

Overview

Irish greyhound racing is a great sport and one that reaches into all communities - rural and urban alike in Ireland. Our sport presents an opportunity to showcase the Irish greyhound internationally, offers a unique social experience of a night greyhound racing and provides a national and international wagering product which has greyhound racing as its core. This role was recognised in the Indecon Review of the industry. As part of that report Bord na gCon committed to a wide range of regulatory measures to enhance integrity and this work is ongoing. It is timely that as this work continues a specific review was undertaken into anti-doping and medication control measures within Irish greyhound racing. That review is now to hand and its recommendations have been considered by Bord na gCon.

The anti-doping and medication report and the response of Bord na gCon set out in this Anti Doping and Medication Control Programme are published so as to advise stakeholders of the progress achieved to date in improving integrity and also to emphasise its commitment to further measures to safeguard the reputation of the sport.

Progress to date

The review was commissioned in December 2014 and completed in August 2015. In the interim, while the report was being prepared and considered a significant amount of progress has been achieved as follows:

- We are working in close collaboration with the Minister and colleagues in the Department of Agriculture and Food, on all matters to support and develop the greyhound industry
- We have introduced legislation which enables us to
 - Undertake out of competition testing at kennels;
 - Publish all laboratory results where there is an adverse analytical finding;
 - Prohibit a greyhound from racing when an adverse analytical finding has been made until such time as a test for prohibited substances has been carried out and the result of the test is negative;
 - Publish all Control Committee decisions;
 - Establish of a list of laboratories approved for testing the “B” sample in place of the Public Analysts;
- We have used the existing legislative framework to
 - Undertake in competition testing at all high profile events;
 - Undertake testing at greyhound sales and trials;
 - Prosecute under the Welfare of Greyhounds Act 2011;
 - Enhance licensing application screening under the Greyhound Trainers Regulations 1961 and necessary conditions attached;
 - Investigate and successfully conclude cases involving anabolic steroids;

- Revoke licence of trainers found to have committed anti-doping breaches and issued a Disqualification Order of the involved Greyhounds;
- Introduced a list of laboratories for independent analysis of the “B sample on request from owners and trainers;
- We have established a Scientific Committee of national and international experts to advise Bord na gCon generally on matters relating to doping and medication control;
- We have established the National Greyhound Consultative Forum bringing all stakeholders together on a wider variety of greyhound related matters, including anti-doping and medication control;
- We have issued guidance to all Industry Participants on the risks of feeding meat to racing greyhounds that may yield a positive test result when sampled under our rules of racing;
- We have worked with the Minister and colleagues in the Department of Agriculture Food and the Marine to get additional powers for our officials to be appointed by the Minister as authorised officers under the Animal Remedies Act;
- We have and will continue to publish all available policies on our website resource centre¹ as a “one stop shop” for regulatory information;
- We have reviewed all the standard operating procedures within the regulation department, have revised where necessary and internally documented in order to ensure a robust and repeatable operation of Bord na gCon’s regulatory systems under a process that is quality assured by the Bord na gCon Quality Assurance Manager;
- We have established an operational regulatory stakeholder group on the Management of Intelligence and Drugs Action in Sports (MIDAS) to share best practice on rules, research and intelligence in so far as is permitted within existing legislation.
- We are working colleagues in Greyhound Board Great Britain and Australasia in levelling the playing field, for a pure and fair sport.

Future Commitments

Equally though there is a body of work yet to be done and it is this work which will to the forefront of Bord na gCon’s regulatory activity in the immediate future:

- We will further explore the conclusions in the Report in areas of prohibited substances and strict liability.
- We will work with other regulators to further explore the opportunity to combine the laboratory resources of all animal sports bodies into a single national resource so as to underpin our international sporting reputation.
- We will complete an organisational review to consider resource allocation with particular reference to specialist technical expertise in the veterinary/analytical area
- We will work closely with the Minister and officials to further modernise the anti-doping measures in our establishing legislation

¹ <http://www.igb.ie/Resource/>

- We will work closely with the Minister , his officials and the Irish Coursing Club to amend legislation to improve the implementation of Exclusion Orders by either organisation.
- We will publish a booklet on the sanctions which the IGB will suggest to the Control Committee and the Control Appeal Committee as being appropriate for breaches of anti-doping and medication control legislation. It will be a matter for the Control Committee and the Control Appeal Committee to consider the appropriateness of any penalties taking into account the pharmacological aspects of the substances in question, the particular circumstances of each case, and the damage to the integrity of racing.
- We will develop an education programme to cover practical and academic aspects of general greyhound knowledge including aspects of breeding, rearing, training and racing.
- We will hold annual industry briefings to issue advice on findings from the Scientific Committee.

Introduction.

Irish greyhound racing is a great sport and one that reaches into all communities - rural and urban alike in Ireland. Our sport presents an opportunity to showcase the Irish greyhound internationally, offers a unique social experience of a night greyhound racing and provides a national and international wagering product which has greyhound racing as its core.

The welfare of greyhounds is fundamental to Bord na gCon and is enshrined in the Welfare of Greyhounds Act 2011 and the Welfare Code of Practice which is designed to help people achieve good welfare practices. Medication abuse and doping present integrity issues for the sport and may also be a welfare issue for greyhounds. This statement is an opportunity for Bord na gCon to confirm its commitment to ensuring that the welfare of the greyhound is protected and the integrity of the Irish Greyhound Industry derived from a level playing field. In growing and developing the industry Bord na gCon must pursue both strategies simultaneously. There will be times when both welfare and anti-doping will present together; equally there will be instances of either welfare abuse or doping abuse, existing in isolation. No matter how the manifestation of the latter materialises, abuse or administration of any medication or drugs will not be tolerated and there are strategies in place to deal with these eventualities depending on the intelligence and evidence presented.

Equally, the abuse and/or inadvertent use of medication control and doping will never be completely eliminated because it is in some people's nature to fail to administer therapeutic drugs with professional advice or strive to win by cheating. Thus, a minority involved in greyhound racing threaten to undermine the future welfare and integrity of the sport for all. For this minority, the development and deployment of new methods of abuse of substances to influence the performance of dogs is a constant source of risk to the industry. This will not be tolerated. There is no place for those who take advantage of therapeutic medication or more seriously engage in intentional doping to cheat in this sport. While advancements in science and technology create challenges for any Sports Governing Body, Bord na gCon is determined to ensure a level playing field is maintained and continuously enhanced for Irish greyhound racing.

In its response to the Indecon report Bord na gCon committed to a broad range of measures to enhance the current knowledge perspective on the science and policy of anti doping and medication control across animal sports, veterinary medicine and animal welfare. The objective is to use this knowledge to progress and implement improvements in racing integrity. A review was carried out by Professor Tim Morris, who is currently the Independent Scientific Adviser to the Greyhound Board of Great Britain on Anti-doping and Medication Control. The Report which is now to hand, has facilitated Bord na gCon in further developing its communication practices and assessing additional improvements to current structures ensuring that Bord na gCon is at forefront of the industry, in line with the best international standards.

Bord na gCon Anti Doping and Medication Control Programme

It is essential for the successful growth and sustainability of the industry that the minority who view the misuse of medication to animals under their care and/or the use of illegal substances as acceptable practices are not permitted to take part in greyhound racing.

Bord na gCon views its response to the Morris recommendations as an opportunity to elaborate on the many intertwined and at times competing issues at play in the anti-doping and medication control arena. Similar to the Indecon Report of 2014 which issued recommendations in relation to the Industry as a whole, Bord na gCon will consider the above mentioned recommendations in its overall approach to policy setting as part of its programme for anti-doping and medication control. A number of recommendations have already been implemented in the course of our Indecon reforms while some others require further consideration. Those to be further considered, must be reviewed in the context of best international practice as identified in this Report and appropriateness under Irish statutory law. Continuing the commitments made in the response to the Indecon report, Bord na gCon has prioritised the measures within its control to ensure that the momentum and progress already commenced under the Indecon report is maintained and brought to a conclusion.

Bord na gCon will focus its resources on the minority who threaten to undermine this sport. Science will constantly evolve; there will always be newer substances and newer doping schemes to challenge the laboratories. Bord na gCon's anti doping and medication control programme will use a combination of communication, education , legislation, revised resource allocation and revised operational procedures to itself constantly evolve its response mechanisms to these challenges and the wider education of industry stakeholders.

Actions

The following paragraphs detail the actions in respect of the recommendations in the Irish Greyhound Board Anti Doping and Medication Review.

Communication

Bord na gCon together with the Minister and colleagues in the DAFM, are in on-going dialogue on all matters to support and develop the greyhound industry. Bord na gCon welcomes the recent enactment of amending legislation which will, inter alia, enable Bord na gCon officials be appointed by the Minister as authorised officers under the Animal Remedies Act. This practical co-operation is a cornerstone in the Bord na gCon's on-going anti-doping and medication control programme in maximising the benefit of interagency co-operation.

The engagement with stakeholders during the consultative stages of the report highlighted a need for greater clarity of communication with our stakeholders. There was evidence from the consultation of a variety of misunderstandings in terms of IGB medication and anti-doping policy. As an illustrative example there were those, during the consultation, who

thought that by announcing the names of greyhounds selected for testing, Bord na gCon's policy was fundamentally flawed as there was a perception that such greyhounds could be withdrawn from racing in advance of testing. That, was not the case, as all greyhounds had been kennelled at the time the announcement had been made.

The IGB proposes to provide increased communication and marketing of its anti-doping and medication policy once it has been researched adequately and a proposal is in place. In its response to Indecon and its first step developing an anti-doping and medication control policy Bord na gCon established in September 2015 a Scientific Committee of national and international experts to advise Bord na gCon generally on matters relating to doping and medication control, and in particular to review the current list of substances which are controlled and, where applicable, their associated thresholds / screening limits / decision limits, and advise on any changes necessary.. While in the past Bord na gCon has sought the advice of various veterinary experts, this was on an ad hoc basis as specific issues arose, rather than on an ongoing formalised basis. This new group brings a unique set of national and international experts together to advise on the many competing issues in shaping an anti-doping and medication control policy in a sporting environment. The Group will work on various aspects of this Review and on an ongoing basis assess the complexity of doping and medication issues which threaten the reputation, welfare and integrity of the Irish Greyhound Industry. The work of this group will be central to future decisions on lists of prohibited substances and controlled therapeutic substances. The outcomes of the work of this group will be communicated on an ongoing basis to all stakeholders.

Industry stakeholders

Bord na gCon recently established the National Greyhound Consultative Forum bringing all stakeholders together on a wider variety of greyhound related matters, including anti-doping and Medication Control. It is intended that this group will be catalysts in directing how future education initiatives will be structured. Running in parallel with the National Forum, is Bord na gCon's commitment to consult on all aspects of its regulatory reform programme. This consultation is in addition to the consultation conducted as part of the Morris Report.

In addition Bord na gCon are publishing all available policies in its resource centre² as a "one stop shop" for regulatory information. This is a live resource centre for industry participants to access available information. Since 2014 and on a continual basis, all operating procedures within the regulation department are revised and internally documented in order to ensure a robust and repeatable operation of Bord na gCon's regulatory systems under a process that is quality assured by the Bord na gCon Quality Assurance Manager.

Having taken the Morris recommendations into account, Bord na gCon issued guidance to all Industry Participants on the risks of feeding meat to racing greyhounds that may yield a positive test result when sampled under our rules of racing. The reason for these findings is

² <http://www.igb.ie/Resource/>

that some categories of meats used to feed greyhounds may contain residues of the various drugs that were used to treat the animals from which the meat was derived. Racing greyhounds in this context is defined as any greyhound which is likely to be presented for a Trial, Sales Trial or Race at Licensed Stadia. In a change to the previous position, contaminated meats are not considered normal or ordinary feeding within the Bord na gCon's definition of a prohibited substance under the 2007 Racing Regulations. The feeding of such contaminated products will no longer be a defence to the detection of an adverse analytical finding in any proceedings brought under the Greyhound Industry Act 1958.

Regulatory Policy Stakeholders

The report also recognised the importance of communication between all stakeholders connected to the regulatory aspects of the Bord na gCon's work. Bord na gCon values these relationships and sees its relationships with the Irish Coursing Club and wider greyhound bodies as fundamental to the successful implementation of anti doping policy. It welcomes that these relationships and the contributions of each stakeholder are also independently recognised and valued by the report. Bord na gCon will continue to prioritise relationships with our key regulatory partners, recognising our differences in the pursuit of anti-doping policies to benefit the industry at large. Bord na gCon, as per its response to Indecon, would welcome amending legislation to improve the implementation of Exclusion Orders by either organisation.

Control Committee

Bord na gCon recognises the critical role of the Control Committee in the defence of its anti-doping and medication control policy. It is important that the integrity of the Control Committee is supported. In October 2015, amendments were made to the Greyhound Industry Control Committee Regulations and Control Appeal Regulations, to enable the Control Committee give greater information on its decision making. The new regulations also facilitate the Control Committee publishing its findings on any decision made, regardless of the decision, where previously the Committee could only publish decisions found in favour of Bord na gCon.

Other Animal Sports Regulators

The report also recognises at an operational level the role of operational regulators in sharing best practice on rules, research and intelligence in so far as is permitted within existing legislation. Bord na gCon fully agree with sharing information and intelligence both nationally and internationally within the constraints of legislation as already demonstrated via

the establishment of a stakeholder group on the Management of Intelligence and Drugs Action in Sports (MIDAS).

International Stakeholders

Bord na gCon recognises the need for partnership with other international greyhound regulators so as to exchange best practice on anti-doping and ensure a level playing field for all racing greyhounds. Bord na gCon is working with colleagues in Greyhound Board Great Britain and Australasia in levelling the playing field, for a pure and fair sport.

Our international contacts point to problems being similar in different jurisdictions. The solutions adopted can vary depending on culture, legal frameworks, and industry norms. Such comparisons provide a useful yardstick by which to measure Bord na gCon performances nationally and internationally as greyhound regulators in discharging responsibilities for the benefit of the industry.

Education

If Bord na gCon is to be successful in its anti-doping programme, all stakeholders must be aware of the consequences of doping on greyhounds from both a welfare and regulatory perspective and also from the integrity of the sport and its international reputation. The education work of Bord na gCon will have a twin track approach. In the first instance our objective will be to inform and assist greyhound owners and trainers achieve compliance with medication control guidelines and anti-doping rules. We will publish a booklet on the sanctions which the IGB will suggest to the Control Committee and the Control Appeal Committee as being appropriate for breaches of anti-doping and medication control legislation. It will be a matter for the Control Committee and the Control Appeal Committee to consider the appropriateness of any penalties taking into account the pharmacological aspects of the substances in question, the particular circumstances of each case, and the damage to the integrity of racing. This will further streamline Bord na gCon's submissions on penalties at future disciplinary hearings.

Additionally Bord na gCon has recently announced funding for the development of an education programme to cover practical and academic aspects of general greyhound knowledge including aspects of breeding, rearing, training and racing. It is also intended that this programme will include a module on anti-doping and medication control. The programme will be developed in conjunction with industry stakeholders and the intention is to introduce a formal educational qualification for those in the industry, which will be recognised both nationally and internationally. It would also be the objective of the programme that those already working in the industry would be eligible to receive the award on submission of evidence of this prior learning.

Following from its scientific findings, Bord na gCon plan to hold annual industry briefings on emerging drugs.

Legislation

As a Sports Governing Body, Bord na gCon is one of a minority whose regulatory and oversight role is grounded in statute. From an industry stakeholder perspective, this means that rules are clearly specified, and that individual rights are respected and protected by law. In comparing Bord na gCon to other Sports Governing Bodies, the additional requirements of statute law must also be taken into account both in terms of the ease of introducing new regulations and also the restrictions on the type of rule changes possible. The advantages of this regulatory regime lie in the protection afforded to the citizen in requirement of fairness, proportionality and transparency underpinned by access to the Courts by way of judicial review.

While the Bord na gCon is in a minority of Sports Governing Bodies, it is working closely with the Minister and officials to review and enact amending primary and secondary legislation. In this regard the Bord na gCon welcomes the aforementioned enactment of amending legislation which inter alia, will permit its officials to act as authorised officers under the Animal Remedies Act and the new requirement of greyhound owners and trainers maintain records of medicines administered to greyhound in their care. Bord na gCon looks forward to the continued joint efforts to modernise the Greyhound Industry Act 1958 so as to provide the strongest possible statutory regulatory response, in particular in response to medication control and anti-doping.

Since its response to the Indecon report, Bord na gCon has already made considerable progress in the area of legislative reform. Protecting the integrity of greyhound racing has always been at the core of the regulation and welfare department and legislation is the most powerful tool available to us. While some may consider there was a cautious use of legislation, the past 18 months has demonstrated that Bord na gCon will not shirk its statutory responsibilities and will continuously strive to strengthen its integrity measures. Since it issued its response to the Indecon Report, the following legislative initiatives have been introduced:

- Out of competition testing at kennels;
- Publication of laboratory results where there is an adverse analytical finding,
- Prohibition of a greyhound from racing when an adverse analytical finding has been made until such time as a test for prohibited substances has been carried out and the result of the test is negative;
- Establishment of a list of laboratories approved for testing the “B” sample in place of the Public Analysts;
- Publication of Control Committee decisions;

In addition the existing legislative framework has been utilised to

- Ensure in competition testing at all high profile events;
- Successful prosecution under the Welfare of Greyhounds Act 2011 and collaboration with the Irish Coursing Club in issuing fixed penalty notices;
- Enhance licensing application screening under the Greyhound Trainers Regulations 1961 and necessary conditions attached;
- Successful investigation of cases involving anabolic steroids ;
- Revocation of the Trainers Licence of trainers found to have committed anti-doping breaches and a Disqualification Order of the involved Greyhounds;
- Introduction of a list of laboratories for independent analysis of the “B sample on request from owners and trainers.

While welfare and anti-doping are complementary and at times overlapping objectives, each one must be separately provided in the construction of the legislative response. The requirement to keep medical records is an example of one such parallel but separate approach, in that for the welfare of the greyhound the Minister has made regulations under the Welfare of Greyhound Act 2011 and separately, Bord na gCon has included the requirement to keep medical records as part of racing regulations. This ensures that Bord na gCon has access to medical records whether the investigation is welfare or doping driven. If a medication is subsequently reported as an adverse analytical finding and there is no corresponding medical record this fact will be presented to the Control Committee as a serious aggravating factor in cases where the use of prohibited substances is alleged.

Following the introduction of new regulations, Bord na gCon is also about to launch out of competition testing. Out of competition testing is aimed at the detection of prohibited substances which although not detected at the track, continue to influence the performance of dogs at racing. . Equally, stakeholders must understand that a greyhound that have tested positive will be prohibited from racing until such time as it returns a clear test for any substance detected. In the longer term Bord na gCon will consider more severe sanctions for prohibited substances. ,.

The next phase in the public consultation (phase 3) is to further explore the conclusions in the Report in areas of prohibited substances and strict liability. Whilst Bord na gCon aspires to implementing strict liability, it recognises the challenges this model generates, for all stakeholders These issues are complex to address as the definition of prohibited substances and the application of strict liability are at the heart of statutory regulation of the industry. The findings in the report will be evaluated against the backdrop of Irish statutory framework taking into account international best practice and experience. In addition as part of its engagement with Industry stakeholders, Bord na gCon will seek views from greyhound industry participants on the concept of strict liability and its impact on Bord na gCon’s anti doping and medication control policy. Following from this consultation and taking into

account the statutory framework, Bord na gCon will ensure that a science based anti-doping and medication control policy, aligned with best international practice, and informed by the advice of the Scientific Committee, is implemented.

Revised Resource allocation

One of the key recommendations endorsed by Bord na gCon in its response to Indecon and tasked in detail in the Morris report is a review of its laboratory services. Bord na gCon agree with this recommendation however we are equally conscious of the increasing complexities inherent in, and capabilities required of, a modern testing regime given advances in technology and science. Such is the speed of change that substantial and continuous investment is necessary for any analytical laboratory service to keep abreast of changes. With that being the case and the challenges we face in order to maintain an effective service at present the Bord na gCon has a drugs surveillance service which avails of the best combination of outsourced and in-house testing, based on the cost of the testing required and the capability of the laboratories involved to deliver results to the best international standards. However at a high level this is a recommendation the Bord na gCon is currently researching to ensure its long term anti doping and medication control programme is based on greater economies of scale are achieved. In considering how best to achieve economies of scale the priority must be to secure a laboratory facility capable of responding to the increasing sophistication of doping methodologies in greyhound racing and other animal sports together with the analytical challenges posed by such developments. Building on the current interagency cooperation, there is an opportunity to combine the laboratory resources of all animal sports bodies into a single national resource so as to underpin our international sporting reputation.

The Report also offers an alternate organisation structure for the regulatory function of Bord na gCon. This advocates greater separation of roles as between regulation, investigation and case presentation. These recommendations will be considered in the context of the overall organisational review which is examining functionality, structures and available resources. The review will also inform the need for specialist technical expertise in the veterinary/analytical area embedded at a decision making level within Bord na gCon to address some of the more detailed technical issues raised on a ongoing basis and to keep the IGB at the forefront of developments

Summary

Clean racing is everyone's responsibility. Bord na gCon in line with its statutory mandate is committed to consistently implementing rigorous procedures and controls. No one has exclusive rights to solving the problems. Bord na gCon, as the overseeing Sports Governing Body will regulate the sport and through strategic intelligence led testing target the minority who deny others a level playing field. Medication Control and anti-doping measures though

are only as successful as the partnership foundations with stakeholders, particularly owners and trainers. This is your sport, it's also your responsibility, do not let drug cheats steal your glory. Speak out, don't lose out.