



Sam Keenan
Committee Secretariat
Committee of Public Accounts
Leinster House
Dublin 2

By email: PAC@oireachtas.ie

Your ref: S1055 PAC3

28 November 2022

Dear Mr Keenan,

Thank you for your letter of 24 October which summarised questions arising out of the IHRB's appearance before the Public Accounts Committee on September 22nd. I will answer each of the Committee's questions in turn.

1. Whether an exit package was provided for the former CEO of the Irish Horseracing Regulatory Board (IHRB)?

- a. if so, what did the exit package comprise, and
- b. what was the nature of any related non-disclosure agreements entered into?

In 2021, following an independent review of the management and organisational structures in the IHRB, a Voluntary Redundancy and Early Retirement Scheme (HRI/IHRB Scheme) was put in place to facilitate employee turnover and enable the IHRB to make progress in relation to its organisational structure. The former CEO of the IHRB availed of the Early Retirement Scheme and retired from his position in the IHRB in September 2021. The terms of any exit package to be provided were confidential between the parties and are subject to a legally binding non-disclosure agreement.

2. The number of CCTV cameras that have been installed at racecourses across the State.

There are 129 cameras installed and working across six tracks as of today: Naas, Fairyhouse, Limerick, Punchestown, Gowran and Leopardstown, and cameras will be installed in Navan, Dundalk, Down Royal, Sligo and Ballinrobe during the week commencing 28 November. The average number of cameras per racecourse is 21 with a minimum of 16 and maximum of 25. The project manager has indicated that up to 20 tracks will be operational by year-end and the balance will be operational in Q1 2023.

3. A breakdown of full-time, part-time, casual, and voluntary staff employed by IHRB

IHRB staff are employed on full, part-time or casual contracts depending on their roles and the needs of the organisation. Raceday Stewards and members of IHRB disciplinary panels and other committees provide their time and expertise on a voluntary basis. The number of staff and active volunteers is as follows:

Category	Number
Full-time	67
Part-time	58
Casual	19
Total Employees	144
Volunteers	112
Total	256

4. A detailed note on Dr. Suann's report on doping in horse racing, including:

- a. the recommendations in the report yet to be implemented by the IHRB,
- b. what is being done in relation to these recommendations,
- c. the timeline for their implementation, and
- d. the reasons why they have not been implemented.

A comprehensive memorandum setting out the recommendations made by Dr Suann in his report and the current status of their implementation is appended to this letter.

I trust that this letter and its attachments will satisfy the Committee's requirements and thank them for their ongoing interest in the work of the Irish Horseracing Regulatory Board.

Yours sincerely,



Darragh O'Loughlin
Chief Executive Officer

Memorandum

To: Oireachtas Public Accounts Committee
Subject: Equine Anti-Doping (Suann) Report Implementation
Date: 28 November 2022

Introduction:

As the racing regulatory body, the Irish Horseracing Regulatory Board (IHRB) is solely and independently responsible for the making and enforcing of the Rules of Racing and is tasked with assuring the integrity and safeguarding the reputation of Irish Horse Racing and ensuring that confidence in the sport is protected by robust and transparent regulatory practices. The IHRB's integrity functions are funded by Horse Racing Ireland (HRI) under a service level agreement.

In 2021, the Joint Committee on Agriculture, Food and the Marine (the Committee) convened a series of meetings to examine the processes and systems in place around aspects of the integrity of the horse racing industry in Ireland. This followed allegations in the media about the abuse of banned substances in the industry. Arising from their deliberations, the Committee recommended that an independent review be conducted "in relation to the current processes in place by an individual from another horse racing authority internationally."

This review was conducted by Dr Craig Suann and published in April 2022. In addition to reviewing transcripts of the Committee's meetings with stakeholders and its Report, the review was facilitated by the electronic provision of a range of materials and through virtual meetings with IHRB staff and others. Dr Suann reported that the materials were sufficiently comprehensive to gain a thorough insight into the current state of, and the policies and procedures that support, the IHRB's Equine Anti-Doping Programme (EADP). The review concluded that the IHRB EADP does "at least match international best practice in most respects and has made significant advances in recent years." However, a number of recommendations were made that, if adopted, were "capable of enhancing the robustness of the programme's processes, capabilities and capacities." Dr Suann noted that "the implementation of some or all of these recommendations will require the provision of more funding and resources devoted to the EADP, mainly in the form of extra staff". The full report can be accessed [here](#).

This Memo sets out how the IHRB would seek to operationalise the key recommendations of the report, identified by Dr Suann as being of high and medium priority. The attached spreadsheet sets out all 18 of the Suann recommendations. Although the IHRB Veterinary and EADP team is currently working at or beyond capacity, there are some recommendations that can be, and are being, implemented within the IHRB's current resources. Others, however, will require specific additional funding; these are specified below.

We have assessed that the additional resource requirement for 2023, including people, IT development and laboratory testing costs, amounts to approximately €1.5 million. An application for this funding has been made to Horse Racing Ireland and to the Department of Agriculture, Food and the Marine.

Section A:

Recommendations which can be implemented within current budgetary parameters:

- Recommendation 1:
(High Priority)
CCTV should be installed in the Sampling Units of each racecourse

Recommendation 1 is currently being implemented as part of the ongoing CCTV installation across all Irish racecourses. The CCTV system includes a camera within the Sampling Unit.
- Recommendation 4:
(Medium priority)
Enhancing the security oversight of the arrival and storage at, and the despatch from, the IHRB office of the STBs and OOC kits.

Recommendation 4 has been implemented.
- Recommendation 5:
(Low priority)
Continue to scan the horizon for further electronic options to enhance the entry & transmission of data relating to sample chain of custody & submission.

Recommendation 5 is being followed on a continuous basis with nothing specific arising at present.
- Recommendation 6:
(High priority)
Consider overhauling the Rules regarding the referee analysis of the B sample.

Recommendation 6 is currently in the process of being implemented, in the context of a full review and revision of the Rules of Racing which is underway.
- Recommendation 7:
(Low priority)
Consider the long-term storage of selected blood and urine samples.

Recommendation 7 is currently being scoped having regard to best international practice.
- Recommendation 8:
(High priority)
In collaboration with LGC, the IHRB should keep a close watching brief on novel approaches to anti-doping control.

Recommendation 8 is followed on a continuous basis, including through IHRB membership of the International Federation of Horseracing Authorities and the Chief Veterinary Officer's involvement in the International Group of Specialist Racing Veterinarians (IGSRV), an association which advises authorities involved in international regulation and control of horseracing integrity and encourages research on drugs, health and welfare of the horse.



- Recommendation 9:
(Medium priority)
Continue to publish sampling statistics, but improve usefulness by correlating with the total number of runners.

Recommendation 9 is implemented with the publication every six months of the IHRB Equine Anti-Doping Report. The presentation of the operational statistics is refined on an ongoing basis.

- Recommendation 12:
(High priority)
Develop a system of full traceability of Thoroughbreds through all stages of life – HRI, IHRB & Weatherbys Ireland working with DAFM.

Implementation of recommendation 12 is not a matter solely for the IHRB. Rather, it involves a multi-agency approach which is currently underway, being led by the Department of Agriculture, Food and the Marine.

- Recommendation 14:
(Medium priority)
IHRB should regularly review its recruitment and human resources procedures to ensure the highest level of probity of staff associated with the EAD programme.

IHRB staffing and recruitment are kept under constant review to ensure that we have a team which is positioned to meet the needs of the IHRB and the expectations of horseracing stakeholders, in particular the standards that must apply to a best in class EAD programme.

- Recommendation 16:
(Medium priority)
Consider executing a Memorandum of Understanding with the Veterinary Council of Ireland

We have been in correspondence with the Veterinary Council and have agreed in principle to the execution of a Memorandum of Understanding between the two organisations in the New Year.

- Recommendation 18:
(Medium priority)
Review of penalties issued for AAF cases

This recommendation will be implemented in the context of the review and revision of the Rules of Racing that is currently underway. Penalties imposed in individual cases are a matter for the Referrals Committee and/or Appeals Body.



Section B:

Recommendations with cost implications; implementation will be dependent on resources:

- Recommendation 2 and Recommendation 3:

(Medium priority)

The IHRB should consider enhancements to the cross-checking and reconciliation of the STB contents on race day.

The IHRB should consider enhancements to the cross-checking and reconciliation of the contents of the out of competition testing (OOCT) kits during OOCT operations.

Recommendations 2 and 3 can be implemented by development of the IHRB digitised Eventlog system. This development will be delivered in 2023, subject to availability of budget.

- Recommendation 10:

(High priority)

The IHRB should review its race day sampling strategies and racecourse facilities used for sampling with the view to increasing total in-competition samples collected, including the adoption of routine pre-race blood sampling.

The IHRB is committed to further increasing the quantity and quality of raceday testing whilst maintaining its current level of out of competition sampling (c.28%). A number of measures are proposed:

- Instigate on-arrival urine testing and pre-race blood testing as standard across all race meetings, which will require the addition of a third Veterinary Assistant to the current team of two;
- Increase such samples from 300 to 500 to allow intelligence and risk led approaches be used across all meetings;
- Increase stable inspections from 50 to 75 days so that each yard is inspected on average every three years, which will allow better understanding of available intelligence and assessment of risk to feed back into testing strategy;
- Increase out of competition testing from 24 to 50 days on licensed yards and from 5 to 25 on unlicensed yards, 50 samples being taken on each of these days, so as to increase the deterrent effect of inspection and improve intelligence gathering and risk analysis;
- Both on track and off, ensure that a proportion of samples are target screened for major doping agents, in particular biological and short-acting substances.

Such an increase in sampling and testing activity will necessitate a significant increase in funding beyond the resources currently available for people, operational and laboratory costs.

- Recommendation 11:

(High priority)

The IHRB should review its OOCT strategies to increase the focus on high profile/high strike rate training yards and their pre-training and other related establishments.

This links with the solutions proposed for Recommendation 10. Increasing the depth and scope of our current intelligence and risk-based approaches, in particular our testing on unlicensed



yards and our overall surveillance via increased inspections, will allow us to make more effective use of our testing and other resources.

- Recommendation 13:

(Medium priority)

The IHRB should develop a comprehensive sampling history data base for each horse.

This will require further additional development of the Eventlog app, which has been scoped and costed for delivery in 2023.

- Recommendation 15:

(Medium priority)

The IHRB should regularly review, update and formalise EAD programme SOPs, have them readily accessible by the relevant staff, and conduct regular staff training seminars.

The IHRB Equine Anti-Doping Programme processes and procedures operate under approved SOPs. However, processes in this area have undergone significant change, particularly in the last year as the Authorised Officer (AO) team took shape. Reviewing and updating our SOPs is an important contributor to quality assuring the EADP and ensuring it aligns with international standards. A plan for provision of appropriate additional training for the veterinary and AO teams and management of performance has been developed and will require investment.

- Recommendation 17:

(High priority)

The IHRB should examine the resources and staffing levels and structures that are required to ensure the timely hearing of matters relating to adverse analytical findings.

The IHRB Equine Anti-Doping team has undergone significant change in the last five years as our EAD Programme has developed. Bottlenecks have emerged with key man dependencies slowing outputs, such as the timely hearing of matters relating to adverse analytical findings. We have taken steps to optimise operations and streamline processes and will continue to prioritise these through 2023. However, additional resources are required to recruit key skills and enable department restructuring to deliver sustainable performance and achievement of objectives.

Conclusion:

The IHRB is committed to working efficiently and effectively to fulfil our statutory role and also to working closely with the DAFM and HRI where appropriate to secure better outcomes and improved value in the use of resources. Effective collaborations as Authorised Officers under both equine antidoping and welfare legislation evidence this, as do plans to expand our future role as an Approved Body to facilitate horse movement to mainland Europe. Additional resources have been sought from DAFM to enable us to deliver on the recommendations set out in the Suann report. Their implementation will further safeguard the integrity and reputation of Irish horseracing and would support our wider responsibility to protect the horses at the heart of an industry which contributes in excess of €2 billion in total expenditure annually, supports approximately 29,000 jobs and adds considerably to Irish cultural life.



Summary of Suann Report Recommendations:

Recommendation	Priority	Status	
1 CCTV should be installed in the Sampling Units of each racecourse	High	In train - budgeted separately	
2 Enhancements to the cross-checking and reconciliation of the Sample Transport Box contents on race day	Medium	Scoped for inclusion in 2023 Budget	
3 Enhancements to the cross-checking and reconciliation of the contents of the OOCT kits during OOCT operations	Medium	Scoped for inclusion in 2023 Budget	Eventlog App development
4 Enhancing the security oversight of the arrival and storage at, and the despatch from, the IHRB office of the STBs and OOCT kits	Medium	Done	
5 Continue to scan the horizon for further electronic options to enhance the entry & transmission of data relating to sample chain of custody & submission	Low	Done on a continuous basis; nothing specific at present	
6 Consider overhauling the Rules regarding the referee analysis of the B sample	High	In train	
7 Consider the long-term storage of selected blood and urine samples	Low	In train (being scoped, best practice considered)	
8 In collaboration with LGC, the IHRB should keep a close watching brief on novel approaches to anti-doping control	High	Done on a continuous basis but research needed	
9 Continue to publish sampling statistics, but improve usefulness by correlating with the total number of runners	Medium	In train	
10 Increasing total in-competition samples, including adoption of routine pre-race blood sampling	High	Scoped for inclusion in 2023 Budget	Increase PRT 300 to 500; third Veterinary Assistant
(Increases OOCT sampling to keep % of OOCT correct and increases inspections for system to work)			Increase (lic) OOCT 24 to 50 with sample increase
			Increase (unl) OOCT 5 to 25 with sample increase
			Increase Stable Inspections from 50 to 75
11 Increase the focus on high profile/high strike rate training yards and their pre-training and other related establishments	High	Scoped for inclusion in 2023 Budget	increase AFF 5 to 10 days, with sample increase
12 Develop a system of full traceability of Thoroughbreds through all stages of life - HRI, IHRB & Weatherbys Ireland working with DAFM	High	Multi-Agency approach, DAFM lead	
13 Comprehensive sampling history data base for each horse.	Medium	Scoped for inclusion in 2023 Budget	Eventlog App development
14 IHRB should regularly review its recruitment and human resources procedures to ensure the highest level of probity of staff associated with the EAD programme	Medium	In train	
15 Review, update and formalise EAD programme SOPs, have them readily accessible by the relevant staff, and conduct regular staff training seminars	Medium	Scoped for inclusion in 2023 Budget	4 days training/year AOs & 4 days/year VO and VAs
16 Consider executing a Memorandum of Understanding with the Veterinary Council of Ireland	Medium	In train	
17 Examine resources and staffing levels and structures that are required to ensure the timely hearing of matters relating to adverse analytical findings	High	Scoped for inclusion in 2023 Budget	Deputy Head of Vet Ops and Eventlog development
18 Review of penalties issued for AAF cases	Medium	In train	

