Greyhound Board of Great Britain

REPORT

of the

INDEPENDENT ANTI-DOPING AND MEDICATION CONTROL REVIEW

of

Current GBGB Anti-doping and Medication Rules and their Implementation

March 2010

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FOREWORD

By Dr Andrew Higgins

I have pleasure in submitting this Report on behalf of the Anti-doping and Medication Control Review Panel.

The Panel was established by the Chairman of the Greyhound Board of Great Britain and the then Chairman of the Greyhound Regulatory Board following an incident that occurred in August 2009 that had led to a reduction in confidence in the procedures and processes in place to monitor and control the use and misuse of substances in the racing greyhound. This was the catalyst for commissioning a broader evaluation of the industry's anti-doping and medication policy and I was asked if I would chair the Review.

It was stressed to me that this was to be an independent Review, and my request that Dr Peter Webbon, Chief Executive of the Animal Health Trust, was appointed to the Panel was immediately agreed. Dr Webbon has no official association with the greyhound industry but has had considerable practical experience of the sport as well as regulatory involvement with horse racing as former Chief Executive of the Horseracing Regulatory Authority.

The other two members of the Panel are currently involved with greyhound racing. Mr Gordon Bissett is a Racecourse Promoter responsible for two tracks (Monmore Green and Crayford) and is employed by the Bookmaker Ladbrokes. Dr Edward Houghton was an NGRC Steward for two years and is a member of the GBGB Disciplinary Committee. He is a distinguished forensic analyst with many years' experience in the detection and analysis of prohibited substances in racing animals.

My own involvement with greyhounds (other than a very brief spell as a track vet at Slough Stadium in the 1970s) is recent and followed my appointment as Chair of the Retired Greyhound Trust in 2008. I am an independent member of the GBGB UKAS Committee and, like Dr Houghton, I also serve on the Disciplinary Committee. For the duration of this Inquiry Dr Houghton and I exempted ourselves from any hearings involving prohibited substances.

I embarked on this Review with no pre-conceptions, and I believe we all listened to the facts and beliefs and opinions with open minds. We then collectively undertook our analysis and reached our conclusions. We are hugely indebted to the very many people in the industry who wished to give their views to us, most by e-mail, some in writing and a few by telephone. We found all of these exchanges and sources of information to be extremely valuable. A number of our witnesses provided further supplementary evidence in the light of our discussions. We are very grateful to everyone who contributed to our work.

Reference will be made to evidence within this Report. However, we stressed to all interviewees that their contributions would be confidential so, with a few exceptions

relating to executive matters, comments are not attributable other than in very general terms.

The Panel took time to visit Peterborough Stadium in order to view the sampling process as undertaken by Stipendiary Steward Mrs Irene Haselwood. I would like to thank Mrs Haselwood for her patience in demonstrating the selection, collection and despatch process, and for her helpful observations. Thanks also to the Directors of Peterborough Stadium for their hospitality.

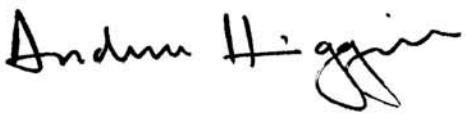
We also visited Quotient BioResearch at Fordham, near Ely. Quotient now incorporates HFL Sport Science, which currently has the contract for laboratory testing with GBGB. I would like to thank Steve Maynard, Laboratory Director, for his help and hospitality. Dr Houghton and I made return visits to HFL to discuss research on oestrus suppression and were always made very welcome.

Together with the Secretary I visited Shelbourne Park Greyhound Stadium, Dublin, and we were fortunate to be able to have some constructive discussions with the Irish Greyhound Board's Chief Executive, Adrian Neilan, and Head of Regulation, Pat Herbert. The exchange was valuable and the hospitality memorable.

Altogether the Panel met on ten occasions and interviewed 28 witnesses. Additional 'homework' was set for the Panel members who put up with my impossible deadlines with remarkable stoicism. We were a harmonious group and I can only thank them for their very hard work, commitment and dedication to the Review.

The administrative workload fell on Peter Laurie, Welfare Manager of GBGB, who undertook his task with great efficiency, never-ending cheerfulness, and with an impressive depth of knowledge of the workings of the industry that was of immense value to our deliberations.

A review of anti-doping and medication policies for greyhound racing in Great Britain is probably long overdue. Much is underway in other sports with the work of the World Anti-Doping Agency (WADA), the European Horseracing Scientific Liaison Committee (EHSLC), the International Equestrian Federation (FEI) and many other international and national sport regulators for humans and animals. It was perhaps none too soon for the industry to take stock and to consider whether the structures presently in place are right for the future and what adjustments need to be made. We were aware of the financial pressures facing the industry and tried to balance these fairly against the non-negotiable necessities of animal welfare and racing integrity. Our hope is that we have provided the Board with a template for policy which can commend itself to the industry.



EXECUTIVE SUMMARY

1. Animal welfare must be paramount in greyhound racing. Moreover, approximately £2 billion is wagered annually on 'the dogs' in Great Britain and the betting public must be protected. Anti-doping and medication control (ADMC) is therefore not to be taken lightly.

2. We find that the ADMC procedures for greyhound racing in Great Britain have been adequate to support both animal welfare and integrity but there are many areas that need to be reviewed, improved and tightened. Rule changes are required.

3. It is our view that there has been insufficient communication both within the GBGB itself and with stakeholders (promoters, trainers, bookmakers, owners, laboratories, veterinarians) with regard to ADMC policy and this must be rectified.

4. We do not believe that doping is a major problem. This is supported by the relatively low number of positive cases reported (0.52% over the last 4 years). However, there is no room for complacency as there remains (and will always remain) a very small minority of individuals who test the system. Constant vigilance and rigorous penalties are needed to deal with people who abuse both the dogs and the sport.

5. In this Report, we make 12 recommendations for addressing what we see as ADMC weaknesses in greyhound racing in Great Britain. Additional resource, better organisational capability, better communication and the wholehearted support and commitment of the GBGB and the industry will be required. We are cognizant of financial constraints but feel there is scope for better cost effectiveness.

6. Suggestions are made to improve the whole process from the establishment of ADMC policy through to the disciplinary hearing. We urge that particular attention be focused on communication, education, training and monitoring.

7. We make a number of proposals for further research and suggest how this should be commissioned. We recommend, for example, better liaison and joint approaches to ADMC issues with the Irish Greyhound Board and Greyhounds Australasia.

8. We recognise that some of our advice may be controversial. However, we hope we have justified each of our recommendations, which are made with a sincere intent to improve the sport.

9. Finally, we suggest that the Board review this Report and recommendations in six months time to examine progress in implementing the findings.

MEMBERSHIP

Chairman

Dr Andrew Higgins BVetMed MSc PhD FSB MRCVS

Editor-in-Chief of *The Veterinary Journal*, Chairman Strata Technology Limited, Honorary Scientific Adviser to the Fédération Equestre International and former adviser to the Stewards of the Jockey Club and the Emirates Racing Association. Formerly Scientific Director and Chief Executive of the Animal Health Trust, Newmarket.

Members

Mr Gordon Bissett

Stadia Operations Controller, Ladbrokes plc. Responsible for the operation of Crayford and Monmore Green greyhound tracks.

Dr Edward Houghton BSc PhD FAORC FRSC CChem

Chair of the Advisory Council on Prohibited Substances and Practices for the International Federation of Horseracing Authorities, Member of the Veterinary Products Committee, Chair of the Standing Committee of the International Conference of Racing Analysts and Veterinarians, and Chair of the Working Party of the European Horserace Scientific Liaison Committee. Former President of the Association of Official Racing Chemists and Visiting Professor at Nottingham Trent University. Formerly Head of R&D and Director, HFL Ltd.

Dr Peter Webbon BVetMed DVR PhD MRCVS

Chief Executive of the Animal Health Trust and FEI veterinarian. Formerly, greyhound track veterinary surgeon for over 20 years, Veterinary Director of the Jockey Club, Chief Executive of the Horseracing Regulatory Authority and Chairman of the European Horserace Scientific Liaison Committee.

Secretary

Mr Peter Laurie MA (Oxon)

Welfare Manager at the Greyhound Board of Great Britain, Secretary to the Welfare Standing Committee, Secretary to the Board of Trustees of the Retired Greyhound Trust. Greyhound owner for more than ten years. Former licensed trainer.

We would like to emphasise that all members of the Panel were appointed by virtue of their individual expertise and that they do not necessarily represent the views of any organisation with which they are associated.

TERMS OF REFERENCE

The Terms of Reference we were given for this Review were as follows:

Background

The Greyhound Board of Great Britain (GBGB) and the Greyhound Regulatory Board (GRB) have announced an independent and external Review of the industry's anti-doping and medication policy. The aim of the Review is to examine the current policy and future options and to make appropriate and enforceable recommendations that will advance the Boards' commitment to the welfare of the greyhound and the integrity of greyhound racing in the United Kingdom.

Scope

To consider whether the current GBGB anti-doping and medication rules and their implementation can be improved, the Review will examine arrangements in other sports relevant to greyhound racing, consider the science of abused substances and their detection, and the practical application of the sampling and detection policies.

HISTORY AND BACKGROUND

1. This Review was commissioned jointly by the Chairmen of the Greyhound Board of Great Britain (GBGB) and the Greyhound Regulatory Board (GRB). It was agreed that there was ambiguity surrounding the sport's current drug sampling strategy and that the Review, which was to be independent, should take evidence and **seek to establish a clear policy** that provided an effective deterrent but took into account the financial pressures within the industry.

2. Dr Andrew Higgins was asked to Chair the Review and the other members were agreed with GBGB and GRB. Mr Peter Laurie, the GBGB Welfare Manager, was appointed Secretary. It was agreed that meetings would be **confidential** to encourage those giving evidence to be frank and open with the Panel. With a few exceptions (on executive or non-contentious issues) comments in this Report are non-attributable. Members were asked to declare any conflicts of interest (none was disclosed).

3. We met as a group on ten occasions, including visits to Peterborough Stadium and HFL Sport Science. Further smaller meetings were convened to discuss particular topics. The Chairman and Secretary had the opportunity of discussing some anti-doping and medication control (ADMC) issues in Dublin with representatives of the Irish Greyhound Board (IGB).

4. A **Call for Evidence Questionnaire** was produced **(Appendix 1**) and widely distributed to trade media and all relevant stakeholder bodies on 4th November 2009. Because we were asked to report early in 2010, completed responses were sought by 30th November 2009. We were very grateful for the publicity given to the Call for Evidence by the greyhound press. Most individuals or organisations wishing to submit written evidence did so within the deadline. A handful of respondents commented that a longer response time would have been better.

5. The Secretary also received **written evidence** by post and by e-mail and took a number of telephone calls from individuals wishing to comment. All evidence was logged and reported to the group. Some individuals asked to give evidence in person. We decided as a group who should be invited to appear before us as witnesses. Two of those interviewed declined to complete the Questionnaire or provide written evidence in advance.

6. In all, we considered 28 pieces of written submitted evidence plus a further 56 additional documents; we interviewed 26 people from across the industry. Lists of the contributors and witnesses are given in **Appendices 2 and 3**.

7. A **Briefing Document** was kindly prepared by the GBGB Security Co-ordinator, Mr Noel Thompson, and provided us with valuable background on the history and operation of the ADMC policy of the National Greyhound Racing Club (NGRC)

to 2008, and GBGB since January 2009. We noted a number of points from this Briefing Document:

7.1. HFL[1] was awarded the contract to analyse samples by NGRC in 1991 following a tender process but it would appear that the contract has not been put out to tender since that time.

7.2. Since 1996, Local Officials at tracks have taken few samples, except where a greyhound's performance causes concern. When a sample is taken by a Local Official a Local Inquiry is triggered. Samples taken by the Sampling Stewards (also known as 'the Flying Squad') and Stipendiary Stewards only lead to an Inquiry if the samples test positive.

7.3. Whilst the number of samples declared void by HFL due to sampling procedures not being adhered to is low, there appears to be no formal training for those involved in the collection process, or education of those in the industry who are subjected to sampling.

7.4. The NGRC Joint Integrity Committee, which had served to bring together NGRC and promoter representatives to guide drug sampling policy, was disbanded on the dissolution of NGRC and no equivalent committee currently meets.

7.5. There is no standard operating procedure (SOP) for the collection of samples or the testing process. There is no direction as to how a Sampling Steward should select greyhounds for testing and there seems to be no evidence of considered intelligence-led sampling activity as part of a coherent drug sampling policy.

8. We were provided with the latest edition of the **GBGB Rules of Racing** (dated March 2009) and were advised that the Rules Review Committee[2] had agreed to await the outcome of the ADMC Review before considering any amendments to the Rules pertaining to drug sampling. We looked at the various forms in use for sample analysis and in reporting results.

9. We were informed that the existing **contract between GBGB and HFL** had expired. We urged the GBGB Acting Chief Executive, Mr Richard Hayler, to postpone signing a new long-term agreement with HFL until we had concluded our Review. We asked to see details of the contract between NGRC/GBGB and HFL, the pricing agreement and recent Annual Reports received from HFL.

10. As requested in the Terms of Reference, we sought information on ADMC policies in force by other relevant **regulatory bodies**, including the IGB, Greyhounds Australasia, Greyhound Racing Victoria, the Arizona Racing Commission, the

[1] Horseracing Forensic Laboratory (now known as HFL Sport Science, part of Quotient Bioresearch Ltd.)
[2] Gordon Bissett is a member of the Rules Review Committee

British Horseracing Authority and the international equestrian federation (Fédération Equestre International; FEI). We noted that the FEI was currently undertaking a major review of its own anti-doping policies. We also looked at the International Federation of Sleddog Sports (IFSS) Guidelines for Urine and Blood Sample Collection and the IFSS Rules of Doping Control.

11. The work of the **World Anti-Doping Agency** (WADA)[3] was considered as the FEI and IFSS have both adapted a number of WADA procedures. WADA's mission is to promote, coordinate and monitor the fight against doping in sport. Established in 1999 as an international independent agency funded equally by the sport movement and world governments, its key activities include scientific research, education, development of anti-doping capacities, and monitoring of the World Anti Doping Code harmonizing anti-doping policies in all (human) sports and all countries. WADA works towards a vision of the world that values and fosters a doping-free culture in sport. However, correspondence with WADA's Sciences Director, Dr Olivier Rabin, dated 13th November 2009, made clear that WADA was precluded from medication control in animal sports and is only involved in human testing.

12. With the assistance of GBGB staff we put together an **analysis of sampling trends from 1991-2005**. We wished to look at the number of positive cases detected annually over the last five years, the type of races, the means by which the samples were collected, the tracks and the penalties applied when a positive case reached the Disciplinary Committee. We also analysed sampling data 2006-2009 and reviewed the most recent 200 positive samples and the penalties imposed by the Disciplinary Committee for these cases. We take full responsibility for all of these analyses but particularly wish to acknowledge the cooperation and assistance of the GBGB Security Co-ordinator, Mr Thompson, and the Senior Stipendiary Steward, Mr Paul Illingworth, in providing us with much of the information we sought.

13. We thoroughly reviewed what information is available on **oestrus suppression** in greyhound bitches. It became clear that this is an issue of considerable concern to many stakeholders and has important ethical and welfare implications. We had discussions with HFL on their findings following several years of funded research work. We looked at options for oestrus control adopted by Greyhounds Australasia, examined publications in the scientific literature and discussed the matter with many of our witnesses. We also entered into correspondence with the government's Veterinary Medicines Directorate, which is the Executive Agency responsible for issues concerning the use and manufacture of veterinary medicines in the UK. We also looked at a pilot study sponsored by Dogs Trust to examine the effects of spaying on performance.

[3] See: http://www.wada-ama.org/

14. We sought details and costs of other **research programmes** that had been funded in recent years by NGRC, BGRF[4] and GBGB. Much of this work was done by HFL or contracted by them to other institutes (such as the University of Iowa).

15. We received a Report dated February 2010 by Phoenix Veterinary Services providing an update on the GBGB **Sudden Death Survey** that had been established by NGRC in 2006.

16. Wherever possible, oral evidence was recorded (with the agreement of witnesses) to facilitate record taking.

[4] The British Greyhound Racing Fund

FINDINGS

1. We were pleased to discover that (aside from the events of August 2009, which are touched on below; paragraph 43) there is general confidence in the current system of **collecting samples**[5]. We viewed the collection process ourselves thanks to Stipendiary Steward, Mrs Irene Haselwood, and the co-operation and hospitality of Peterborough Greyhound Stadium. We share the general confidence but believe that there are parts of the collection process that need tightening and these are outlined in the Recommendations.

2. There was also general satisfaction with the **processing of samples by the laboratory** and we received no criticism of (and considerable praise for) the quality and integrity of the work of HFL over the 18 years they have been undertaking sample analysis for NGRC and GBGB. We discuss below commercial aspects of the GBGB laboratory contract and make a number of recommendations for the future. We received no compelling evidence that counteranalysis was necessary or desired.

3. We concluded from our interviews and written evidence that **doping does not appear to be widespread** in the industry. This view is supported by the number of positive cases reported in the last four years (0.52%) and most of these were substances used for medication in greyhounds. However, it is possible that not everything is being detected (and during the course of our investigation we were given several anecdotal examples of undetected substances or practices that may have been or possibly are being used). Although our impression is that the sport in 2010 is relatively clean we would emphasise that this is a gambling industry and there can be **no room for complacency**. The FEI made a 'clean sport' claim before the 2004 Athens Olympic Games where four horses subsequently tested positive (including a gold medal winning horse found to contain two human anti-psychotic drugs).

4. The evidence would suggest that doping does not cause major **welfare concerns** in greyhound racing at the present time. We find that medication leads to most of the positive cases that are seen. However, we are concerned that greyhounds sometimes do not receive the medication they require because of a fear that the dog may subsequently test positive. This could have **welfare implications** and is addressed in our recommendations.

5. In terms of **integrity and the betting industry**, a recent report by Deloitte[6] revealed that in 2008 greyhounds generated £336 million in gross profit (stakes minus payouts) through licensed betting offices, accounting for about 20% of over-the-counter revenue. That figure does not include on-line/telephone or betting

[5] GBGB Rules of Racing Appendix IV, page 79.
[6] *An Economic Impact of the British Betting Industry*. 26 January 2010. Deloitte.

exchange transactions, which might be another 15% or so, thus lifting the figure to about £386 million, suggesting £2 billion as a reasonable estimate of annual turnover. There is therefore a **substantial responsibility** on the regulator to safeguard the betting public from practices that threaten integrity. We were particularly pleased to be able to discuss these issues with representatives from ABB[7] and BAGS[8].

6. A lot of data is generated on ADMC by GBGB but we feel that the way it is currently presented could be improved. This is not a criticism of existing staff but we think that more direction is needed. We undertook our own **analysis of almost 40,000 sample data from 2006-2009** to indicate where the positive samples were coming from, what type of races, which tracks, what substances and what penalties were being awarded. This revealed interesting indicators and the information is referred to throughout the Report (see **Appendices 4 and 5**).

7. We were informed that in 2008 there were approximately 74,000 races run on GBGB tracks, the majority of which involved six greyhounds. There are some 75,000 trials each year which may be run solo or with 1-4 dogs. Data presented to us showed that about 10,000 samples are taken each year from some 600,000 individual greyhound runs. This equates to **a test rate of approximately 1 in 60**. In comparison, information from the IGB indicates that they test around 1 in 20 dogs (5500 samples from18,000 six-dog races in 2009). One respondent advised that 79% of (1154) licensed trainers in Great Britain have at least one dog sampled during the course of a year. We noted that all Category 1 race finalists are sampled, and that greyhounds in high profile races are often tested, not least because such races attract some of the highest betting turnovers.

8. Of the 26 GBGB-licensed tracks, we were advised that 17 currently host BAGS meetings with around 26,700 races annually. The **importance of integrity to BAGS** was powerfully emphasised to us and we were told that major betting coups would be most likely to take place on BAGS races. A case was put forward that GBGB does not put enough ADMC focus on BAGS races. However, one Sampling Steward told us that he visits each of his BAGS tracks twice a month and takes approximately 15 samples on each occasion. We were told that Stipendiary Stewards are each expected to collect 50 samples from the BAGS tracks in their jurisdiction in the course of a year. Our analysis (**Appendix 4**) revealed that about 70% of samples are currently taken from tracks with BAGS contracts, and about half of these samples are from BAGS races, generating around 17% of all positives. We recognise the importance of integrity to BAGS and this is reflected in our recommendations.

9. We acknowledge that **betting exchanges** may have increased the temptation to dope greyhounds. The ability to back a dog to lose a race could present a strong motive for influencing performance using medication or practices that

[7] The Association of British Bookmakers
[8] Bookmakers Afternoon Greyhound Service

have an impact on welfare and integrity. We were told that the betting industry is very conscious of this possibility and carefully monitors trends in off course betting patterns. We discuss below, and make recommendations for Racing Managers to undertake **more post-race testing** of dogs that have underperformed in a race.

10. We learned that **sampling of greyhounds in trials** sometimes presents difficulties since fewer tracks now have dedicated trial meetings. Our analysis (**Appendix 4**) demonstrated that 18% of samples come from trials (including sales trials) but these produce 30% of the total positives. Sampling Stewards took 85% of all trial samples but with wide variance from track to track[9], and one Sampling Steward took very few trials samples in 2009. The evidence suggests that greater emphasis needs to be placed on this sector. We were advised that sampling in trials should be focussed on (1) greyhounds having their second or third trial or (2) trialling back after an absence from racing. We make recommendations about increased sampling at trials.

11. **Sales trials pose a difficulty**, not least as there is a *perception* that many dogs reared in Ireland are given anabolic steroids (particularly stanozolol) to build muscle mass before a sale. This claim needs to be addressed[10]. There is undeniable potential for commercial gain and the incentive to maximise the performance of a greyhound before sale is likely to be high. Currently there are about 15 sales trials each year and perhaps 60 or so dogs trialled at each. We were told that the organisers cover the majority of sampling costs but as they are run at licensed premises GRB provides the Sampling or Stipendiary Steward to collect the samples. Under the principle of strict liability the trainer of a recently purchased dog is responsible for any positive findings from any race or trial (Rule 174(i)) but the Disciplinary Committee frequently hears in mitigation that 'the dog was doped before purchase at a Sales trial'. We make recommendations to address these issues.

12. The **elective tests** currently offered by GBGB are not widely taken up and in order to protect the trainer we make recommendations that **a new system** should be introduced to enable trainers to lodge a sample from a greyhound at the point of registration for GBGB racing. This sample would be stored and analysed only if a subsequent sample taken from the same greyhound returns positive within a six month period.

13. We examined **track security** from the ADMC perspective. Rule 112 states that greyhounds must be kennelled at a track at least 45 minutes before the race or trial in which the dog is due to participate. Rule 114 states that after a greyhound has been kennelled no person shall have access to the Racing Kennel except under the surveillance of the Paddock Steward or Security Officer or Licensed

[9] For example in Sunderland in 2009 only 32 trial samples were taken during the year, compared to 447 samples from races.
[10] There were eight stanozolol positives in 2008/9 that went to the Disciplinary Committee.

Veterinary Surgeon. We were told that kennel standards vary and some promoters will have to make modifications to the kennels following the implementation of new Animal Welfare Act Regulations[11] that come into force on 6th April 2010.

14. With regard to existing track security, there will always be ways and means to dope a greyhound and no security system can be 100% safe, not least because of the human element[12]. Rule 217 is clear in prohibiting the administration of any substance to a greyhound in the paddock. Our opinion, based on our own experience and the information we have been given, is that once a dog is locked up[13], it is relatively difficult to access and dope. With closed circuit television, vigilant Paddock Stewards and Local Officials, and a commonsense approach to security, we believe track integrity should be satisfactory.

15. In terms of **sampling procedure**, GBGB Rule 173(i) clearly states that Stipendiary Stewards, the Local Stewards and the track's Licensed Veterinary Surgeon have the power at any time to take samples from any greyhound which is due to take part or has taken part in any trial or race or which is in any licensed kennels. Rule 173(ii) states that the Local Stewards shall have the power to keep a greyhound under surveillance for as long as necessary in order to collect a sample. Having reviewed the numbers of dogs sampled in trials and races, those that test positive, and the official who collected the samples (**Appendix 4**), we make a number of recommendations for greater use of these powers.

16. We were told that Sampling Stewards take 10-18 samples at each meeting they attend, mostly at random but sometimes targeted and based on intelligence. **Most samples are pre-race**, taken about 15 minutes before a race, primarily by the Sampling Stewards but also by Stipendiary Stewards (who attend approximately 5% of race meetings and take about 25% of race samples; see **Appendix 4**). Only 5% of samples are currently taken by Local Officials. We believe an adjustment is needed with **considerably more post-race sampling** and a greater involvement of Local Officials, particularly when a dog underperforms. Stipendiary Stewards must continue to scrutinise race cards and results and investigate anomalies. Appropriate recommendations are made.

17. If a dog finds time in a race (i.e. its running time is significantly improved) it should be placed back in the track kennel and not given access to any substance (other than clean drinking water) and the kennel door locked until the

[11] *Animal Welfare, England: The Welfare of Racing Greyhounds Regulations* 2010. Effective 6 April 2010. See: http://www.defra.gov.uk/foodfarm/farmanimal/welfare/act/secondary-legis/greyhounds.htm

[12] We heard several anecdotal stories of substances given to a greyhound just before a race. For example, we were told by several witnesses that cocaine was being administered (either as a paste smeared on the gum, or as a powder 'puffer', or in a time release gelatine capsule) in an apparent attempt to create a 'rush' just before the dog enters the trap. There have been ten positives for cocaine metabolites since 2005 but more post-race testing will be required to determine whether there really is a problem.

[13] i.e. the greyhound has been identified, weighed in, examined by the Licensed Veterinary Surgeon and placed into a track kennel under the surveillance of the Paddock Steward, Security Officer or other Licensed Official, and then locked.

greyhound is taken out and sampled. It is our view that there are very few substances that actually improve performance, although drugs can restore a dog's potential capability (e.g. by the use of pain killers) or build up muscle mass (e.g. anabolic steroids). Several witnesses were concerned about dealing more effectively with poor performers. We accept that there are many ways to 'slow down' a dog in addition to doping it, but we feel that Local Officials must call for **more post-race samples** when a dog loses time.

18. We were told that one of the reasons a Racing Manager may be reluctant to post-race test a dog is that the request automatically launches a **Local Inquiry**, whether or not the dog subsequently tests positive. Rule 155 states that whenever the Local Stewards are not satisfied with the greyhound's performance they shall hold a Preliminary Investigation. If there may have been a breach of the Rules a Local Inquiry must be convened (Rule 156). We considered this and have recommended that if either the Racing Manager or the track's Licensed Veterinary Surgeon is concerned about a dog's performance in a race or trial they should be able to sample that dog immediately, but unless there are other non-ADMC reasons, a Local Inquiry need only be initiated if the animal subsequently tests positive.

19. A further concern about post-race testing is an apparent reluctance (particularly in evening race meetings) to sample dogs from **races later on the card**. This will require a culture change and an appreciation that post-race sampling is a very important part of maintaining integrity. Dogs that have raced sometimes give a urine sample on return to the kennel area, but if not, they must be given time to rest and rehydrate with fresh drinking water only, and then sampled again after 30-60 minutes. If a urine sample is still not produced, then the Licensed Veterinary Surgeon should collect a blood sample[14] under Rule 173(ii).

20. We were advised that the IGB employs full time Control Stewards to select and carry out the sampling procedure. At each meeting two greyhounds are selected for sampling by means of a random draw carried out in public before racing[15]. This is an interesting concept but we felt it would be too demanding on GBGB's limited resources to become a routine procedure in Great Britain at the present time.

21. Several of our respondents commented on the need for **out-of-competition testing**. We support this idea. It seems that, although permitted under Rule 173(i) this option has rarely been used, probably as a matter of resource and the tight schedules of the Stipendiary Stewards. One experienced witness when asked if he could make one change to the drug sampling strategy replied at once that it would be the sampling of greyhounds out of competition, including between

[14] Figures from HFL confirm that in 2009 there were 9487 urine samples analysed and 145 (1.5%) blood samples.
[15] In addition, IGB Stipendiary Stewards target various race meetings and carry out more extensive testing.

rounds of a competition. Other respondents said there should be **more inspections of kennels** by Stipendiary Stewards. We have therefore made recommendations for out-of-competition testing and believe that this should be primarily the responsibility of the Sampling Stewards under the direction of the Director of Regulation and the Senior Stipendiary Steward.

22. It became increasingly obvious to us that the existing **Treatment Books** are not being completed properly by many trainers (in breach of Rule 216) and that they are not being properly monitored by Stipendiary Stewards. **This renders any ADMC strategy ineffective**. Failure to complete Treatment Books is sometimes used as an excuse by a trainer who has returned a positive. One respondent said that a change in the mindset of trainers is required with regard to Treatment Books. We believe that trainers must be instructed in the need to have accurate treatment records and should be penalised when they do not do so. We make recommendations to deal with this.

23. We were told by some respondents that it would be impractical to have **individual medical records** for greyhounds but others commended the idea enthusiastically as workable and indeed essential. We therefore make recommendations for developing a new system for keeping records of all veterinary treatments. In the meantime, we suggest that the Stipendiary Stewards start to issue **Improvement Notices** for first offenders and then report repeat offenders to the Director of Regulation for breaches of Rules 216 and 217.

24. We have sympathy with trainers and their veterinary surgeons who are confused about what substances may or may not be given to a greyhound close to a race. We have looked critically at Rules 217 and 218 and believe they require redrafting. Having examined approaches used in other animal sports we have concluded that for greyhound racing in Great Britain the **7-day rule** should remain as it is a useful rule-of-thumb. Reference to 'tonics' should be removed and clarification given on what constitutes a 'liniment'. We believe Rule 215 (on the feeding of bread containing poppy seeds) and Rule 218 (on anti-bacterial agents and the feeding of meat) should not be Rules of Racing but contained in an Annex or supplementary Code or Guide.

25. **Any dog requiring veterinary care must always receive it**. As such, we can see no reason why simple first aid medicaments should not be given at any time to a racing greyhound *as long as such treatments do not affect performance*. We therefore propose creating a '**First Aid Box**' of medications that can be used for minor ailments within 7-days of a race. The list must be published and is likely to include substances such as potassium permanganate, ferric iodide, Friar's balsam, Vaseline and certain specified antiseptic creams, but will not include any substances that might influence performance such as non-steroidal anti-inflammatory drugs, anabolic steroids etc. Recommendations are made accordingly.

26. Occasionally, for welfare reasons, there may be a need for a registered veterinary surgeon to administer a prohibited substance to a dog within 7 days of a race or trial. For example, a local anaesthetic may be required to suture a small wound; antibiotic cover for a bite; treatment for insect allergy etc. Under certain circumstances we believe the dog could be allowed to run if evidence can be presented, signed and dated by the trainer's registered veterinarian, to explain what substances were given, for what purpose, when they were given, the doses and the route of administration. We suggest this information is provided on a new form, to be called a **Therapeutic Use Exemption (TUE)**. A model can be found in Medication Form 1 used by the FEI[16]. The TUE would be presented to the Licensed Veterinary Surgeon when the greyhound is examined at the track (Rule 113(iii)) and **the Licensed Veterinary Surgeon will decide whether the drug could affect performance**. He will countersign the TUE and advise the Racing Manager of his decision. If the dog is allowed to race, the TUE will be forwarded to the Director of Regulation by the Racing Manager. *It should be emphasised that if a sample is collected from the dog and is positive for a prohibited substance, it will be treated in exactly the same way as any other positive sample*. We intend that the TUE will be used rarely and would stress that all abusers of the TUE system should be rigorously sanctioned.

27. Some respondents felt that the number of dogs tested by GBGB each year was about right, others that too few greyhounds were tested, and some that GBGB tested too many dogs. This variation in opinion was probably inevitable. There is however dissatisfaction that **the number of dogs tested** appears to have been driven by the laboratory contract, leading to an apparent need to 'catch up' if the number is not met at year end.

28. We were told that there was a proposal in mid-2009 that sampling should be drastically reduced. Such a decision at that stage would have been wrong, not least because of the integrity and animal health and welfare implications. We believe that any adjustment in sampling numbers and strategy demands careful analysis, consultation and debate.

29. We received conflicting views about the **coordination and direction** provided to Sampling and Stipendiary Stewards. We concluded that there is some dialogue among the Stipendiary and Sampling Stewards themselves, but nothing formal, and ADMC policy and implementation discussions between field staff and GBGB Headquarters appear to be very limited.

30. We recognise that responsibility for implementing ADMC policies is (or should be) shared to a greater or lesser extent between the Director of Regulation, the Senior Stipendiary Steward and the Security Co-ordinator, with appropriate input from the Independent Veterinary Director. At present, accountability is diluted and ADMC policy is not joined-up. We are of the view that the **Director of Regulation** is the correct position to take overall responsibility for ADMC policy

[16] See: http://www.horsesport.org/sites/default/files/Medication%20Form%20I_0.pdf

and its implementation, working closely with the Senior Stipendiary Steward and the Security Co-ordinator. We make recommendations accordingly.

31. We listened to many witnesses' opinions on **the need for a strategy** and agree that there is too little co-ordination and discussion both within GBGB and between the regulator and the industry generally. One witness told us that dope testing represents an *undirected use* of about £1 million annually. Moreover, liaison with HFL (which is critical) has become minimal. The NGRC Joint Integrity Committee, which served a role in debating and discussing ADMC issues, was not re-created following the formation of GBGB in January 2009. We were advised that a Drug Sampling Committee had been proposed and indeed held an inaugural meeting in early 2009, but there were no Minutes produced, the committee did not meet again, the membership was not confirmed, and there are no terms of reference. As such there is a void. Many executive staff members have worked commendably to maintain a working system but we find that the ship has been rudderless.

32. We suggest that a fresh start be made with the creation of a new, independent and robust expert group to assist the Board and executive with ADMC issues and we make specific recommendations for the composition of this group, which we have called the **Doping and Medication Advisory Panel (DMAP)**. We believe the Panel should be advisory, with no delegated powers or executive role, but its responsibilities will be to inform the Board, and to advise the executive, Stewards and stakeholders on doping and medication issues. It should also guide the appointment and define and monitor the standards required of the laboratory. We feel the DMAP should also help with the preparation of an annual ADMC sampling strategy. We outline our recommendations for a Year 1 strategy in **Appendix 6**.

33. As a point of principle we believe that **all positive results must be submitted to an identical process, without any exceptions**. We make recommendations for the independent DMAP to review all positive laboratory reports. These would be signed off by the Chairman or other independent member of DMAP before the case can be processed by the Director of Regulation. This would ensure there is an independent review of the laboratory report (at this stage there must be no reference to the name of the trainer, dog or race). The Director of Regulation would be informed that the technical data were in order, and the nature of the prohibited substance(s) detected and an indication of the possible significance of the finding would be given. This **Medication Report** would form part of the evidence bundle.

34. We believe that through the Director of Regulation the DMAP must make the most of the **considerable expertise** that already exists at GBGB, both within the executive (Senior Stipendiary Steward, Security Co-ordinator, the Investigating Officer, Stipendiary and Sampling Stewards etc.) and on the Board. The DMAP would also liaise with the Veterinary Sub-committee of the Welfare Standing

Committee as appropriate. In our Recommendations we outline what we see as the various duties of the DMAP.

35. Some substances are not easily detected. We learned of rumours that **erythropoietin (EPO)** was in use and 'widely available'. To detect substances such as EPO it will be necessary to plan ahead with the laboratory and to undertake targeted and random sampling. Such approaches should be considered when defining the annual ADMC strategy.

36. Until August 2009, when a full-time Sampling Steward resigned, GBGB employed one part-time and two full-time **Sampling Stewards**. At one of our early meetings we were told of a plan to change the job descriptions of the Sampling Stewards. On 16th November 2009, we sought clarification from the Acting Chief Executive, Mr Richard Hayler, as we felt it would be pointless to continue with our Review if GRB had already decided to implement a new sampling strategy.

37. In his written reply dated 27th November 2009, Mr Hayler explained that since February 2009, the GRB had been reviewing the titles and job descriptions of all field staff. The focus was the role of the Stipendiary Stewards and how their existing varied responsibilities affected GBGB's application for UKAS accreditation. As part of that review the roles of the Sampling Stewards and the Investigation Officer were also considered.

38. Mr Hayler added in his response that there were two other significant and related issues. Firstly, following the resignation of the Sampling Steward (who had not been replaced pending the staff structure review) GBGB was some way short of delivering to HFL the minimum number of samples agreed under contract. Secondly, there was a backlog in the number of identified possible breaches of the Rules of Racing requiring investigation. Faced with these issues, the GRB discussed a solution whereby the part-time Sampling Steward would be promoted to a full-time role, and both Sampling Stewards would receive on-the-job training in the work of Stipendiary Stewarding. The aim, wrote Mr Hayler, was to increase the flexibility of field-based resource without significantly increasing costs, both to tackle the specific concerns and to deliver a system of local inspection and regulation which would satisfy UKAS ahead of the 6th April 2010 deadline.

39. Mr Hayler stressed that there was no suggestion that the arrangement defined future strategy for collecting samples for drug testing. There was no intent to pre-empt the findings of the ADMC Review and he stated that he had no reason to believe that our considered recommendations would not form the basis for the sport's medium to long term approach to drug testing. We were grateful for this clarification.

40. In a further face-to-face meeting on 12th February 2010, Mr Hayler explained to us that the two Sampling Stewards were expecting to be made trainee

Stipendiary Stewards. He said that no contracts had been signed but training was due to start on 1st March 2010. Mr Hayler said he believed that the cumulative sampling load would be the same as at present allowing training to proceed.

41. During the course of our Inquiry many witnesses made it clear that they would be concerned if the Sampling Stewards were to be removed. We agree with this concern. Having listened to the evidence and examined alternative approaches, we consider that **random sampling is critical to the success of any GBGB anti-doping policy** and we feel that this would be severely compromised by the lack of dedicated Sampling Stewards. One experienced Stipendiary Steward told us frankly that random testing 'is the only way forward'. Another told us that there are two deterrents to drug abuse (1) the contract a trainer has with a track, and (2) the random sampling routine. We were told that a full-time Sampling Steward takes 3000 samples per year. Clearly, with all their other responsibilities, a Stipendiary Steward could only take a fraction of this number.

42. We have recommended therefore that the Sampling Steward posts be retained but with a wider remit for education and training, strategy discussion, communication on ADMC issues with the industry, and for out-of-competition testing. To send out a strong message, we feel that the title of the Sampling Stewards should be changed to **Drug Control Stewards**. We believe there should be three Drug Control Stewards, under the leadership of the Senior Stipendiary Steward and the Director of Regulation. Specific guidance, training and preparation must be provided. It is axiomatic that the timing of visits to tracks by Drug Control Stewards must be totally unpredictable.

43. A number of respondents had very deeply held views about the **crisis in August 2009** that led to the setting up of this Review. We do not feel it is constructive to dwell on this event, which we feel was ill-considered and arose due to bad judgement, a lack of consultation, and a complete misunderstanding about the principles of anti-doping controls including the analytical process. We were told HFL advised against the idea. As far as we could deduce, the aim was to identify what prohibited substances were in circulation. In doing so, it was decided on economic grounds to waive the identification of the samples. The idea seems to have been that samples would be mixed at the track and screened in batches of up to 36 so as to link positive findings to a racecourse and to give an indication of the scale of drug use (to '*see what's out there*'). Even if the intention was not to prosecute any trainer, the perception that bona fide samples were being opened and pooled at the track was disastrous and broke the inviolate requirement for a secure chain of custody.

44. We have considered very carefully the **policy of compositing samples**. Compositing is not an unusual practice in an analytical laboratory but must not impact unacceptably on standards of integrity. It must take place *only* at the

laboratory, once each individual sample has been logged into a highly secure database and the samples opened by an employee of the laboratory.

45. As agreed with NGRC in the 1990s and continued with GBGB, the agreed policy is that HFL takes *part* of each of four samples (from dogs of the same gender) and screens the mixture. If the screen produces a result indicating that one or more prohibited substance(s) might be present then all four samples are screened *individually* to see which contained the substance(s) of interest. However, there has to be a balance. By pooling four samples, the chances of detection are reduced by a simple dilution effect. Fortunately, the high sensitivity of the equipment in use in laboratories means that very low concentrations of many drugs can be detected and a judgement was made by NGRC in consultation with HFL that a x4 dilution was justified. We accept this decision, with two caveats. The first is that for intelligence-driven sampling, out-of-competition testing or in targeting specific animals or substances, the sample must be tested *individually* with no pooling. The second caveat is that there is in place a **negative sample screening programme** to ensure that potentially positive results are not being missed.

46. **Further research** is needed to see whether x6 or x8 (or more) compositing is possible (**Appendix 7**). This must be a cost-benefit analysis because as soon as a composite tests positive, the cost saving from pooling is reduced by the necessity to screen all of the component samples (x4, x6, x8 etc.). If the decision is taken to pool more than the current 4 samples, it becomes even more imperative that a robust negative sample screening programme is in place.

47. We were surprised that the **laboratory contract** with HFL has been in place and renewed regularly since 1992 without testing the market. We would strongly recommend that the laboratory requirements of GBGB be exposed at least every five years to a **tender process** and that the DMAP be consulted in drafting the tender document and assessing the bids. In our judgement it is perfectly reasonable that a laboratory is given an indication of the number of routine samples likely to be forthcoming in any given year (in order to budget for staff and time), but we believe the terms of the GBGB contract should be more flexible and negotiable, possibly given as a range e.g. 8-10,000, 10-12,000 etc. We are uneasy with the present arrangements whereby the GBGB is liable to pay for 10,000 samples whether or not the full number is collected.

48. Some witnesses were concerned that there was **insufficient research** into new substances that may be in use. We were advised that the contracted support for research at HFL (£7,000 per month) was stopped by the former GBGB Chief Executive in June 2009 with a decision that research funding would only be granted on a per-project basis following receipt of costed research proposals commissioned by the Board. The Independent Veterinary Director was responsible for the research but the Chief Executive dealt with the negotiations with the laboratory and the finance. We agree that the research budget should

be separate from the routine analytical work so that competitive work can be commissioned from either the laboratory or from any other institute where it could be undertaken satisfactorily.

49. HFL provided us with the **threshold levels** that were agreed with NGRC for methylxanthines (caffeine, theobromine and theophylline). We see no reason to change these but it should be for the DMAP to discuss with the laboratory what other threshold levels are required (for example, testosterone or testosterone esters, procaine etc.), at what level they should be set, and how best to agree screening limits of detection for certain therapeutic medicinal substances. We also feel it would be helpful to commission excretion studies (**Appendix 7**) for those substances used as medications in racing greyhounds but whose detection time may be close to 7-days. GBGB could then publish detection times for these specific substances. This approach has been adopted (using only a small number of dogs) by Greyhounds Australasia[17] and used successfully in horseracing[18] and by the FEI. We were told that some work on detection times has already been undertaken by HFL at the request of NGRC.

50. We make a number of other recommendations about research that we feel should be commissioned (**Appendix 7**). They include a test to differentiate **morphine** (an opiate pain-killer that can be given to affect performance) from possible feed contamination. Bread containing poppy seeds (Rule 215) and some other feed sources can lead to a positive test. We recommend studies be commissioned to establish a screen that will differentiate food-sourced morphine from deliberate administration of the opiate. We urge that **all positive morphine cases** are dealt with by the Disciplinary Committee and considered by the DMAP so that, if necessary, a proper investigation of the sources of the drug can be determined. Strict liability must apply and more effort put into educating trainers about the need to be careful about sourcing feed.

51. We also looked in some detail at **oestrus suppression**. Rule 56 states that a bitch may not run in any race or trial after coming into season for a minimum period of 21 days (nor until, in the opinion of the Racecourse Veterinary Surgeon, it is fit to do so subsequently). Rule 57 adds that the Racing Manager must be informed within 7 days when a bitch comes in season, has a false heat, is spayed, whelps a litter or is treated with medication that could alter the normal oestrus cycle. Rule 57 also requires that the trainer is given and retains a receipt in the form of a copy of a Greyhound Detail Report. We gained the impression that these Rules are not being followed or enforced. We make a number of recommendations to assist the Board in reaching a policy for oestrus control.

52. Oestrus suppression can be desirable because it is difficult to own a bitch that breaks into season frequently and needs at least 10 weeks layoff each time (one trainer said bitches need up to 17 weeks' rest when they come into season). We

[17] See: http://www.galtd.org.au/GreyhoundsAustralasia/index.php?q=node/53
[18] See: http://www.ehslc.com/detection/how.html

were told by many respondents that the 21 days referred to in Rule 56 is unrealistic.

53. Rule 217(i) permits medicinal products which have been authorised by the Veterinary Medicines Directorate (VMD)[19] for the suppression of a bitch's season, and prescribed by a veterinary surgeon. One of these substances is **testosterone** (Durateston). We can see no justification, on ethical or welfare grounds, for the use of an androgenic ('masculinising') drug in a racing bitch and urge that the use of testosterone be prohibited as soon as possible. Several respondents told us testosterone is not a good suppressant.

54. There was general agreement that the other approved oestrus suppression products are unreliable or cause problems; these are megoestrol acetate (Ovarid), proligestone (Delvosteron) and medroxyprogesterone acetate (Promone E). Two alternative substances were suggested to us, namely, **ethyloestrenol** (Nandoral), which was previously licensed for use in UK but is no longer marketed in this country for veterinary use, and **norethisterone** (Primolut-N), a human contraceptive that we understand has not been marketed for animal use but is said to be popular with some trainers. More research will be required (**Appendix 7**) and ongoing discussions with VMD and the manufacturers are now needed to ascertain what data must be generated to allow one or both of these currently unlicensed products to be made available. This is likely to have a significant cost implication.

55. The alternative is to encourage the **racing of spayed bitches**. One respondent told us that only 5% of trainers spay bitches. Others pointed out that when greyhounds retire (through the Retired Greyhound Trust, RGT) they must be spayed so why not at 6 months of age (or once it is known that the bitch is not good enough for breeding)? The resistance probably reflects (1) cost, and (2) the possibility that the bitch will win well and be in demand for breeding.

56. We were told of a pilot study, commissioned by Dogs Trust, to determine whether spaying reduces performance in racing greyhound bitches, but the results were not made available to us. If these data show that spaying has no effect (or perhaps a beneficial effect) on a racing bitch, we would suggest a larger study should be undertaken to confirm the results (**Appendix 7**).

57. We received an update from Phoenix Veterinary Services on the findings of the **GBGB Sudden Death Survey**. We would suggest that in considering this report the Veterinary Sub-Committee assesses whether any unexplained deaths are attributable to doping or drug abuse. In any case, we suggest Rule 173(iv) is modified so that following a sudden death of a greyhound at a GBGB racecourse not only should a post mortem examination be arranged but also

[19] An Executive Agency of the Department for Environment, Food and Rural Affairs; see http://www.vmd.gov.uk/

that samples (most likely blood and/or urine) are taken for forensic analysis and forwarded to the laboratory in the usual way.

58. Adequate **communication and education** on ADMC matters is currently lacking. There is no forum within the industry for compulsory education and there was considerable feeling that the Board should do more to require licence holders across the sport to demonstrate competency. We believe a minimum standard must be established to demonstrate knowledge of the GBGB ADMC policy and its enforcement. This should apply not only to trainers but also to tracks and Local Officials. We feel the **Drug Control Stewards** can play a major role in education and training and monitoring, and enforcement should be the responsibility of the Stipendiary Stewards. We listened carefully to the advice we were given and have made specific recommendations on how we feel the ADMC education policy should be developed by GBGB in collaboration with the Racecourse Promoters' Association (RCPA) and the Greyhound Trainers' Association (GTA) (**Appendix 8**).

59. A **Testing Manual** should be produced, and referred to within the Rules, providing a standard to follow when samples are collected by a Stipendiary or Sampling Steward, or a Local Official or Licensed Veterinary Surgeon.

60. The **Disciplinary Committee** was criticised by many respondents for *perceived* inconsistencies in penalties given to trainers whose dogs tested positive. Perhaps surprisingly, there is a clear wish within the industry for penalties to be much more severe for doping offenders. A suggestion was made that the Disciplinary Committee should be encouraged to include the costs of processing the samples with a penalty fine. In Ireland, we were told that 'under the Greyhound Industry Regulations 2007, the Independent Control Committee is empowered to direct any person to pay any cost or expenses which have been incurred partly or wholly by the actions of such person, including the costs of the Control Committee in conducting any investigation or hearing'.

61. Several examples of **inconsistent penalties** were given to us, so we *decided* to conduct our own analysis (**Appendix 5**). We must point out that it is impossible to comment objectively on any penalty awarded by the Disciplinary Committee without knowing the circumstances of each case. We were told that it was helpful in previous years when the Calendar carried more detailed information about each Inquiry. We agree and have made recommendations accordingly. We also suggest the introduction of **penalty guidelines** for use by the Disciplinary Committee. Penalties should be considerably influenced by previous breaches of the Rules, or a long, clean record, as well as by mitigating or aggravating factors. We suggest the perception of inconsistency is reviewed again in 12 months.

62. **Rules changes** will be required to address many of our recommendations and it would be advisable to seek the advice of the DMAP in revising those relating to ADMC.

63. Finally, we have been persuaded throughout the Review, that there is a very real need for more **consultation and discussion** across the industry. We would strongly urge the Board to develop mechanisms for wider consultation in further revision of ADMC policies.

RECOMMENDATIONS

Recommendation 1: Organisational Focus

1.1 Our investigation has indicated that there is inadequate cohesion, integration and co-ordination within the Greyhound Board of Great Britain (GBGB) structure in connection with anti-doping and medication control (ADMC) issues. We have concluded that there is a need for better ADMC policy making, strategic thinking and forward planning. Moreover, we do not believe that the necessary expertise and experience is currently available amongst the existing GBGB senior staff. We therefore recommend the establishment of a **Doping and Medication Advisory Panel (DMAP)** to be appointed by the GBGB Board ('the Board'), and chaired by an independent scientist familiar with the field. The DMAP would report direct to the Board on policy, strategy and funding, and to the Greyhound Regulatory Board (GRB) on rules, regulations and implementation of the strategy.

1.2 In addition to the Chairman, the **membership of the DMAP** should comprise an independent veterinarian experienced in medication issues[20], an independent analyst (who must be unconnected with the laboratory appointed by GBGB for testing services), a representative of the greyhound industry who is fully familiar with medication issues, and the Director of Regulation whom we recommend should be the **executive responsible** for ADMC policy implementation. The Panel should be serviced by a member of the GBGB executive.

1.3 The DMAP should be advisory. Its tasks, which should be reviewed annually, would include: (1) to draft a strategy for ADMC measures for consideration by the Board; (2) to monitor the implementation of the Board's ADMC policy; (3) to oversee the appointment of and liaison with the contracted laboratory, and to agree laboratory standards and procedures; (4) to review the components of the sampling kit; (5) to consider, propose and monitor ADMC research programmes; (6) to participate in meetings with officials and stakeholders to ensure intelligence is pooled, discussed and acted upon (see 4.1).

1.4 We recommend that **all positive reports** are sent to the DMAP directly from the laboratory as soon as they are available. There should be no reference to the name of the greyhound, trainer or track so the report is anonymous to the DMAP. The Chairman or other non-executive designated member of the DMAP would then consult and within 48 hours advise the Director of Regulation via a signed **Medication Report**: (1) whether or not technically[21] the case may proceed; (2) if it is in order to proceed, the nature of the prohibited substance(s) detected, and (3) an indication of the significance of the prohibited substance(s). The

[20] This could be the GBGB independent Veterinary Director depending on perceived conflicts of interest.
[21] i.e. the procedures have been followed correctly, the Certificate of Analysis is accurate etc.

Medication Report should be devised by the DMAP and will form part of the evidence bundle.

1.5 We recommend that the advice of the DMAP be **routinely sought** by the Director of Regulation on all medication issues, including possible cases of accidental positives (e.g. from feed etc.; see 8.2). The DMAP should provide specific guidance on treatments and practices that fall outside the Rules relating to ADMC policy (see 6.6) and all matters of **risk analysis** (e.g. the choice of analytical methods used by the contracted laboratory) in connection with ADMC policy.

1.6 We recommend that a **Standard Operating Procedure** (SOP) is produced, in conjunction with appropriate legal advice, to ensure all subsequent stages in the investigative and judicial process are rigorously followed when a positive finding is reported by the laboratory. A model has been provided as used by the Legal Department of the FEI[22].

Recommendation 2: Sampling Policy

2.1 Notwithstanding the controversy surrounding the sample collection initiative that occurred in August 2009 (and led to this Review), we have concluded that the mechanics of the procedures currently in place for the collection of samples and their delivery to the laboratory are essentially sound. Specific recommendations for **tightening the security** and ensuring a consistent standard of the sample collection process are made (2.5, 2.6) and we recommend that these are addressed immediately.

2.2 Sampling at race meetings must be three-pronged: (1) **routine** (e.g. sampling all finalists in Category 1 competitions); (2) **random** (where the dog is selected at random by the Stipendiary Steward or Drug Control Steward [see 5.3] or Local Official), and (3) **targeted** (intelligence led or selected by Local Officials following unusual performance before, during or after a race). We wish to emphasise that we consider random sampling to be the single most **highly effective deterrent** (see 5.2).

2.3 The evidence we have received indicates that **Local Officials** seldom test dogs that underperform or otherwise do not run according to form. We believe this is (1) because a Local Inquiry must be called if a Local Official calls for a dog to be sampled post-race, and (2) there is little appetite for testing a dog after a late race on the card. We recommend that the Rules are changed so that a Racing Manager or a track's Licensed Veterinary Surgeon may order a post-race sample to be taken **without automatically triggering a Local Inquiry**. If the sample tests positive, notification would be in the usual way (see 1.4) and the Director of

[22] Available as Annex 23 of the Inquiry papers.

Regulation would advise the Local Officials of the result. Collection of this sample should be the responsibility of the **Licensed Veterinary Surgeon.**

2.4 We recommend that as a trial for 12 months, 50% of samples collected at all races and trials are **post-race** and that the Board should review the findings after the trial period. Thereafter, the number of post-race samples will be decided in accordance with the agreed sampling strategy (see 3.2). We appreciate that a culture shift may be needed to facilitate post-race sampling, but believe that this objective must be pursued. Clearly greyhounds require time to rehydrate and recover from a race and, where necessary, the Licensed Veterinary Surgeon should wait to collect a blood sample if urine is not excreted after a reasonable rehydration period (say, 30-60 minutes).

2.5 **Specific Guidelines** should be produced for all officials who collect samples. We believe the standard Testing Manual provided by the FEI for its Medication Control Programme sampling veterinarians offers a good model[23].

2.6 To prevent **dangers of contamination** of a sample, we urge that all personnel collecting urine from dogs must wear disposable latex gloves[24] and that this requirement (1) must be enforced, and (2) is clearly stated in the Manual (see 2.5). At present the collector is offered gloves but it seems that most decline. The need to use gloves will require explanation and education (see 10.3 and 10.4).

2.7 We recommend the introduction and use of **Out-of-competition testing** at licensed premises. Such operations are likely to be infrequent but sufficient annual targets should be set so that it does act as a deterrent. Out-of-competition testing must be unannounced and carefully planned (see 4.1); it should be undertaken by a Stipendiary Steward or a Drug Control Steward. Any greyhound on licensed premises may be sampled and the Treatment Records examined, copied or seized. Rules may need to be modified to allow reports of the analysis to be forwarded to the DMAP, and for the trainer to be summoned to appear before the Disciplinary Committee if any dogs test positive and/or if there are any inconsistencies with a dog's Treatment Record (see 6.2 and 6.3).

2.8 We find there is no compelling requirement for **counteranalysis** and we recommend that cases continue to be considered solely on single sample analysis.

[23] FEI Testing Manual; see: http://www.fei.org/sites/default/files/file/VETERINARY/Manual%20H4%2019.06.08%20def%20web.pdf

[24] Many respondents advised us that the present gloves offered when a greyhound is selected for sampling are simply not fit for purpose. More suitable alternatives are readily available and should be introduced as soon as practicable.

Recommendation 3: Future Strategy

3.1 Our analysis of the sampling undertaken during the last five years is given in **Appendix 4**. We note that 70% of all samples taken have been from tracks with BAGS contracts and that just over half of these samples (36%) were from BAGS races. It should be noted that this large number (more than one-third of all samples taken) generated just 17% of the total number of positives. We recognise that this level of testing reflects concern that BAGS tracks are most likely to be targeted for any fraudulent betting activity involving doping of dogs. Conversely, 18% of the samples came from trials and generated 30% of the total number of positives. Only 5% of samples were collected by Local Stewards. Samples taken by Stipendiary and Sampling Stewards accounted for most samples and those collected by the Sampling Stewards generated more positives (see 5.2). The number of trials sampled varied widely across the regions.

3.2 We recommend that the DMAP establish a **Sampling Strategy** on a year by year basis and that this is rigorously monitored during the year. We recommend that the Director of Regulation and Senior Stipendiary Steward are responsible (as part of their job descriptions) for implementing the strategy and for co-ordination and liaison. The Board should approve the general outline of the Sampling Strategy to enable a budget to be set for the policy on an annual basis.

3.3 Our recommendation for a Sampling Strategy for **Year 1** is given at **Appendix 6**. This is based on an examination of the evidence presented to us and we believe offers a good opportunity to test the proposal allowing modifications to be discussed and recommended by the DMAP for subsequent years. The Year 1 strategy requires 67% of the samples to be analysed are taken in a random fashion (see 5.2).

3.4 We recommend markedly increasing the numbers of dogs tested at **trials and Sales Trials** (see **Appendix 6**). We believe this is an important area where integrity and welfare may be currently compromised (see 3.1).

3.5 To protect trainers acquiring a dog that may have been treated with a sustained release preparation prior to purchase, or where a substance may have been given to modify the performance of a trial dog, our Year 1 Sampling Strategy recommends **sampling every greyhound presented for registration** and storing these samples for up to six months or until such a time as the greyhound is first tested at a race or trial (whichever is the sooner). Only if the dog tests positive will the stored sample be analysed to determine whether the substance was present at the time of registration. The results of both analyses would be included in the evidence bundle.

3.6 Where dogs are tested at sales trials, we recommend sales organisers **withhold payments** to vendors until the results of the analysis are returned. GBGB should do all it reasonably can to expedite the laboratory and notification process.

Recommendation 4: Improving Access to Information

4.1 We recommend that the Director of Regulation and Senior Stipendiary Steward work closely with the Stipendiary and Sampling Stewards, the Investigation Officer(s) and the Security Co-ordinator to **pool intelligence** and to establish an effective means for discussing and disseminating it. This may involve, for example, a routine weekly conference call of all parties, the establishment of an ADMC Hotline (where information may be left anonymously or where information can be made available on ADMC issues), the creation of Regular Bulletins to Stipendiary and Sampling Stewards.

4.2 The Security Co-ordinator currently records or has access to considerable data on ADMC cases and we believe that for future decision making this is an important potential source of information and intelligence that should be **regularly analysed and updated**. We suggest that the methods we used may be appropriate. The data will be essential in the efficient creation of a worthwhile Sampling Strategy.

4.3 We recommend that GBGB works in the longer term to improve and utilise central database sources of intelligence.

Recommendation 5: Effective Use of Resources

5.1 It is our recommendation that **three dedicated Sampling Stewards** are required for effective ADMC implementation in Great Britain. Over the last four years, the data indicate that Sampling Stewards took 71% of samples overall, generating 76% of the positives. They also took 85% of all trial samples, reflecting just 18% of samples taken overall yet these generated 30% of all positives. This implies that there is a need to increase sampling at trials.

5.2 We do not believe that the work can be effectively conducted by Stipendiary Stewards as their duties are different and sometimes conflicting. The **random element** of testing that we believe is critical as a deterrent (see 2.2) will be lost at the track unless samples can be taken independent of the Stipendiary Steward.

5.3 We further recommend that the position of Sampling Steward be re-named **Drug Control Steward** and that individuals appointed to this role receive appropriate training and that their job descriptions encompass training and education of others in the industry (see 10.3).

5.4 We recommend that the **Director of Regulation**, working closely with the Senior Stipendiary Steward, is responsible for directing the Drug Control Stewards so as to ensure sampling is random and visits cannot be predicted.

Recommendation 6: Medication and Greyhound Welfare

6.1 **It is fundamental that any greyhound requiring veterinary care must receive it**. This statement is unequivocal and animal welfare commonsense. However, we find that considerable confusion seems to arise, possibly due to poor wording and implementation of Rule 217. We have spent much time debating the veterinary aspects of the statement and our recommendations will require consultation, discussion and, we believe, Rule changes.

6.2 A key requirement for medication control is the proper and effective use of treatment records. We find that the current system of Treatment Books is ineffective. We recommend that each registered greyhound has its own **individual Treatment Record** following a strict proforma devised by the Veterinary Sub-committee. All dogs receiving veterinary attention must have the following details recorded: (1) the reasons for the treatment; (2) the name of any product used, the dosage and the route by which it was administered; (3) who gave the treatment. If a drug is a Prescription Only Medicine (POM), the name and address of the prescribing veterinary surgeon must also be given. The Treatment Record must be available for inspection at all times.

6.3 We appreciate that the introduction of individual treatment records may be logistically difficult to implement immediately and we therefore recommend that the **system be trialled** with 20 trainers and gradually introduced over a period of two years in discussion with trainers and veterinarians. In the meantime, we recommend that with immediate effect the Senior Stipendiary Steward be instructed to notify trainers: (1) that all Treatment Books must be properly completed in a timely, comprehensive and mature manner in accordance with the Rules; (2) that the Treatment Books are regularly checked by the Stipendiary Stewards, and (3) that **severe penalties** may be imposed by the Disciplinary Committee if they are not compliant or current.

6.4 We recommend retention of the **7-day Rule** as a useful rule of thumb to assist trainers and their veterinarians. However, the 7-day Rule must never be used to deny or delay veterinary treatment. Any greyhound requiring treatment on veterinary grounds must receive that treatment and the information recorded. The Treatment Book (or Treatment Record) can be presented at any Disciplinary Committee Inquiry and, where appropriate, the signing veterinary surgeon invited to give evidence in support of his/her decision.

6.5 We recommend that a **Therapeutic Use Exemption** (TUE) form be created to be used when a veterinarian recommends specified prohibited substances within 7 days of a race (examples might be for the use of a local anaesthetic to suture a minor laceration, or to provide antibiotic cover following a bite). The TUE would be presented to the **Licensed Veterinary Surgeon** at the track at the time of inspection. The Licensed Veterinary surgeon will examine the dog and decide whether the treatment was likely to influence the dog's performance in the race.

If he/she decides the treatment will not affect performance, he/she will sign the form and the dog may compete. The form will then be forwarded to the Director of Regulation. The TUE Form could be based on Medication Form-1 used by the FEI[25]. *For the avoidance of doubt, even when a TUE is issued, a positive result must be dealt with in the usual way if the dog is sampled*.

6.6 We further recommend that the DMAP be invited to consult with the Veterinary Sub-committee of the GBGB Welfare Standing Committee and that the DMAP then define a '**First Aid Box**' of treatments and practices that fall outside the Rules relating to ADMC. This list will be published and may be modified from time to time. Substances in the 'First Aid Box' might include, for example, potassium permanganate, ferric iodide, Vaseline, certain antiseptic creams etc. Substances that could affect performance, such as non-steroidal anti-inflammatory drugs, anabolic steroids, corticosteroids, thyroid hormone etc. would not be included in a 'First Aid Box' listing.

Recommendation 7: Improving Cost Effectiveness

7.1 Currently, between 9,000 and 10,000 racing greyhounds are tested in Great Britain each year from some 600,000 combined race and trial starts. This means that about 1 in 60 dogs starting in a race or trial are tested. In accordance with the **Sampling Strategy**, as outlined in 3.2 above, we recommend an increase of around 30% in the number of samples collected in Year 1 (**Appendix 6**) and that numbers tested in subsequent years should reflect the findings and analysis of data generated in this initial first year's investigation.

7.2 The Panel is mindful of the cost implications of testing and has looked critically at the arrangements in place with the currently contracted analytical laboratory, HFL Sport Science. We recommend that the GBGB contract for laboratory services should be subject to a **tender process** at least every five years. The tender document would be drafted with advice from the DMAP to address service requirements, laboratory standards, storage capability, reporting systems and support required. We recommend that at least three laboratories are invited to tender for the GBGB contract on each occasion and that the DMAP be invited to consider these and make recommendations to the Board.

7.3 Medication research will always be needed. This is true for all sports and reflects the doper's constant endeavour to find new approaches to influence athletic performance. Sometimes the research will be required urgently (e.g. to work up a laboratory screen for a new substance) but other work can be planned ahead (e.g. excretion data or establishment of a threshold). A realistic budget needs to be set annually by the Board following recommendations from the DMAP. We further recommend that the ADMC **research budget** be separate from the laboratory contract to encourage competitive applications. Commissioned

[25] FEI Medication Form 1; see: http://www.fei.org/sites/default/files/Medication%20Form%20I_0.pdf

research should be negotiated as and when required either with the contracted laboratory or with other research centres. Our discussions with IGB indicated that there may be willingness to pool knowledge and resources on ADMC issues and we recommend that this should be explored further. Research that we believe should be given priority is given in **Appendix 7**.

7.4 We have examined the policy of 'pooling' samples for **composite analysis** and we are persuaded that the impact of the current arrangements on detection of most prohibited substances is acceptable. At present four samples are pooled by the laboratory once they have been individually identified and logged into the laboratory's highly secure database. The composite is then screened. If a prohibited substance is identified then all four samples are individually analysed.

7.5 To monitor the effect of pooling samples, an appropriate **negative sample screening programme** must be in place. This could be achieved in part by subjecting all of the samples from a pool to a full screening analysis when a suspicious finding is obtained from the composite. When this occurs, we recommend that a certificate of analysis on all four samples must be provided by the laboratory.

7.6 Certain samples (e.g. those that are intelligence-led or out-of-competition) may need to be sent to the laboratory with a clear indication that they are not to be pooled prior to analysis. This would be a decision for the Director of Regulation in consultation with the DMAP.

7.7 We recommend that a commissioned study (**Appendix 7**) be undertaken to determine what would be the effects of **further pooling** (for example, x6 or x8) on detection capability so that the DMAP can advise the Board whether this would be cost effective. If further pooling should be an option, then it is essential that the recommendation in 7.5 applies.

7.8 We found that there was no demand from stakeholders to modify the elective system. This probably reflects the cost of the service. It was noted that a recommendation that all greyhounds provide a sample at the point of registration may reduce the demand for **elective tests** but we recommend that consideration should be given as to whether the existing elective system might be revised and even extended to include other long-acting or sustained release substances.

7.9 We believe that the laboratory thresholds for caffeine, theobromine and theophylline should be published and that additional thresholds, for example for testosterone, testosterone esters (see 9.1) and procaine, should be defined and published (see **Appendix 7**).

7.10 We recommend that whenever possible samples are collected by the Licensed Veterinary surgeon from all **dogs that die on a track** and that these samples are processed through the laboratory in the usual way.

Recommendation 8: Food Related Issues

8.1 We have examined **positive cases arising from feed** and believe that the Rules (e.g., 214, 215, 218) need to be revised (see 12.1 and 12.2). We recommend that Rule 215 (on the feeding of bread containing poppy seeds) and Rule 218 (on anti-bacterial agents and the feeding of meat) should not be Rules of Racing but contained in an Annex or supplementary Code or Guide.

8.2 We are persuaded that there is no justification for moving from the principle of **strict liability** and recommend that the trainer remains fully liable for any positive result arising from feed. Thus, dogs that test positive for a putative feed contaminant (e.g., morphine) must be dealt with by the Disciplinary Committee and be disqualified in accordance with Rule 173(ii). Where positive results appear likely to have been derived from feed, the Director of Regulation should seek the advice of the DMAP which will provide guidance and may recommend that an investigation be undertaken, the results of which would be presented to any subsequent Disciplinary Committee hearing.

8.3 In the specific case of **morphine** we recommend that research be commissioned (see **Appendix 7**) to seek a means of detecting through morphine metabolites in the urine whether the source is feed contamination or exogenous administration with a view to influencing performance.

8.4 We recommend that **all cases of possible feed contamination** must be dealt with by the Disciplinary Committee.

Recommendation 9: Improving Oestrus Suppression Options

9.1 It is not possible ethically to justify the administration of androgenic (masculinising) agents (such as testosterone [Durateston]) to racing bitches and we recommend that **testosterone should be prohibited**. We recommend that research be commissioned (**Appendix 7**), building on existing data, to establish a threshold level for testosterone in the greyhound bitch and/or a method to develop a screen for testosterone esters in plasma. This will allow a distinction to be made between a healthy cycling bitch (which demonstrates a testosterone peak at one stage in her cycle) and those bitches that have received testosterone injections to affect performance.

9.2 We recognise that there are potential welfare hazards should testosterone be withdrawn before suitable alternatives are in place. Equally, we understand the reluctance of some trainers and veterinarians to use the other licensed products that are currently permitted, namely megoestrol acetate (Ovarid), proligestone (Delvosteron) and medroxyprogesterone acetate (Promone E). Two alternative

substances have been suggested. These are (1) **ethyloestrenol** (Nandoral), which was previously licensed for use in UK but is no longer marketed in this country for veterinary use; (2) **norethisterone** (Primolut-N), a human contraceptive that we understand has not been marketed for animal use.

9.3 Greyhounds Australasia under their Rules of racing only allows ethyloestrenol for oestrus suppression. Specifically, it is listed as an exempted substance 'when administered orally to a greyhound bitch and where it has been prescribed by a veterinary surgeon for the sole purpose of regulating or preventing oestrus in a bitch.' This Rule is currently under review. We suggest exploring joint international research opportunities in respect of oestrus suppression with Greyhounds Australasia and the IGB.

9.4 We recommend that GBGB continue negotiations with VMD to explore how to facilitate use of ethyloestrenol[26] and/or norethisterone. Registration data may need to be generated and we recommend that discussions are opened with the IGB and product manufacturers to consider how best to commission and fund such studies (**Appendix 7**).

9.5 We were advised that a **pilot study** to see whether the spaying of bitches affected racing performance by Ms Jacqui Molyneux, a veterinarian, and funded by Dogs Trust, has been recently concluded but that the data have not been published and were not made available to us. We recommend that discussions are opened with Ms Molyneux and/or Dogs Trust to examine the results of this study which may assist in formulating recommendations on oestrus suppression. It should be noted that this was a very small study and further research is likely to be necessary to test the findings (see **Appendix 7**).

9.6 Oestrus suppression at best is always going to be a compromise. It is our recommendation that, ideally, bitches should be spayed or allowed to cycle normally. Until this is possible, we recommend that the use of an alternative suppressant, such as norethisterone, is explored.

Recommendation 10: Improving Understanding

10.1 It became apparent during our deliberations that there is a worrying amount of ignorance within the industry on aspects of the current ADMC policy as implemented by the Board. There is also uncertainly among some officials and regulators. We believe that the establishment of the DMAP (see 1.1) will assist the regulatory team and we recommend a strong emphasis should be given to **communication, training and education** within the industry (see **Appendix 8**).

[26] In Australia, permission to allow supply of an unregistered veterinary chemical product is granted by the Australian Pesticides and Veterinary Medicines Authority. The permit states that it is only valid while there is no suitable registered product available for the purpose.

10.2 There are no structured minimum standards of competency and knowledge for greyhound trainers and their employees. With regard to ADMC policy we recommend that this is provided not only for trainers and kennel hands but also for all appropriate staff employed by promoters (such as Racing Managers, Licensed Veterinary Surgeons, Paddock Stewards etc.).

10.3 We recommend a **compulsory training programme** consisting of a single short (1-2 hours maximum) annual meeting at each track at which ADMC policy can be explained, new Rules discussed and questions answered. Attendance at such training session should be a condition of licence.

10.4 We further recommend the publication (on line and in hard copy) of a short, simple and clear **Guide to GBGB's ADMC policies** that describes the procedures and processes and explains how these operate. We consider the *FEI Competitor Guide to Doping and Medication Control in Horses*[27] should be viewed as a possible model.

10.5 We advise that regular Notices and Warnings prepared by the Director of Regulation and the Senior Steward are posted in paddock areas and on the **Notice Board** of each track's Licensed Veterinary Surgeon. If such Notice Boards do not exist, we recommend each track be required to position one outside the Veterinary Office.

10.6 We recommend that as part of a trainer's licence renewal, he/she is required to complete a short **multiple-choice questionnaire on ADMC issues** to confirm basic understanding of GBGB's Rules and regulations in this area (see **Appendix 8.2**). The questions would also be discussed with the trainer's Stipendiary Steward during annual inspections or at any other time, or with the Drug Control Stewards.

10.7 We recommend that a dedicated place on the **GBGB website** be identified for ADMC issues and that the Director of Regulation is responsible for overseeing the updating and maintenance of the site.

10.8 **Education policy** on ADMC issues should be agreed by the Board and implemented by the Senior Stipendiary Steward. We envisage the Drug Control Stewards (see 5.3) playing a major role in education and training.

Recommendation 11: The Judicial Process

11.1 Much of the evidence we received included reference to perceived inconsistencies in the decisions of the **Disciplinary Committee** when sanctioning trainers found to be in breach of the Rules relating to ADMC policy. Our own analysis revealed that there is wide variation in penalties (**Appendix 5**).

[27] See: http://www.fei.org/sites/default/files/Anglais_0.pdf

11.2 We recommend that **penalty guidelines** be established for different degrees of offence to assist the Disciplinary Committee in dealing with cases involving positive samples. Moreover, we suggest that, subject to mitigation, the trainer will be liable for a proportion (to be fixed by the Board) of the costs of analysis and subsequent disciplinary process when a dog tests positive.

11.3 We further recommend that when a decision is reached on an ADMC case, the Chairman of the Disciplinary Committee Hearing should qualify the decision (in no more than a few lines) explaining any mitigating circumstances that were taken into account or cautions or warnings that were given in the light of that case. These **qualifying notes** should be included in the Press Release that is issued by GBGB following a positive case and published in the Calendar. We recommend that this proposal should be implemented immediately by the Director of Regulation.

11.4 In accordance with Rule 173(ii), when a trainer is found to be in breach of an ADMC Rule the Disciplinary Committee must **automatically disqualify** the dog from the race in question and this should be clearly stated in the judgement.

11.5 We recommend that **all samples** that test positive are dealt with by the Disciplinary Committee.

Recommendation 12: The Rules

12.1 It is apparent that many of our recommendations will require revision of the Rules of Racing. This offers a good opportunity to streamline the Rules relating to ADMC (173, 174, 214, 215, 216, 217 and 218) and to consider the use of Annexes for details.

12.2 We recommend that revision of all Rules relating to ADMC should be undertaken with representatives of the DMAP and, where necessary, specialist legal advice.

Post script

We recommend that this **Report should be reviewed by the Board in 6 months' time** to examine progress in implementing the findings.

ACKNOWLEDGEMENTS

We are very grateful to all who took the trouble to provide written evidence and to those who came before us to discuss their views in person. Their candid comments were of inestimable help to the Inquiry.

GBGB and GRB honoured the independence of the Inquiry and we in turn endeavoured to meet their request for a Report within the first quarter of 2010. The GBGB staff members were invariably courteous and helpful in providing information and responding to specific questions that we asked throughout the Review. We would like to express our appreciation to them. Peter Laurie's work as Secretary has been outstanding.

We would also like to thank those representatives of organisations outside GBGB who have kindly provided some comments and opinions. These include the Irish Greyhound Board, Greyhounds Australasia, the Veterinary Medicines Directorate, the Fédération Equestre International, World Anti-Doping Agency and others. A special vote of thanks must go to HFL Sport Science for welcoming us to their laboratories and for several useful and frank discussions.

Finally, we offer our thanks to the Directors of Peterborough Greyhound Stadium for their generous hospitality and assistance when we met there on 4th December 2009.

ABBREVIATIONS

ABB	The Association of British Bookmakers
ADMC	Anti-doping and medication control
AGTV	Association of Greyhound Track Vets
BAGS	Bookmakers Afternoon Greyhound Service
BGRB	British Greyhound Racing Board
BGRF	British Greyhound Racing Fund
DMAP	Doping and Medication Advisory Panel
FBGOA	Federation of British Greyhound Owners Association
FEI	Fédération Equestre International (the International Equestrian Federation)
GBGB	Greyhound Board of Great Britain
GOBOTA	Greyhound Owners Breeders and Trainers Association
GRB	Greyhound Regulatory Board
GTA	Greyhound Trainers' Association
HFL	Horseracing Forensic Laboratory (now known as HFL Sport Science, part of Quotient Bioresearch Ltd.)
IFSS	International Federation of Sleddog Sports
IGB	Irish Greyhound Board
NGRC	National Greyhound Racing Club
POM	Prescription Only Medicine
RCPA	Racecourse Promoters' Association
RGT	Retired Greyhound Trust
SGV	Society of Greyhound Veterinarians
SOP	Standard Operating Procedure
TUE	Therapeutic Use Exemption
UKAS	United Kingdom Accreditation Scheme
VMD	Veterinary Medicines Directorate
WADA	World Anti-Doping Agency

APPENDICES

Appendix 1: Call for Written Evidence

Appendix 2: List of those providing Written Evidence

Appendix 3: List of those giving Evidence in Person

Appendix 4: Analysis of Sampling Data 2006-2009

Appendix 5: Analysis of Penalties for the 200 most recent positive cases

Appendix 6: A proposed Year 1 Sampling Strategy

Appendix 7: Research Requirements

Appendix 8: Training and Education

Appendix 1

GREYHOUND BOARD OF GREAT BRITAIN & GREYHOUND REGULATORY BOARD

Independent Inquiry

ANTI-DOPING AND MEDICATION CONTROL REVIEW PANEL

Background

The Greyhound Board of Great Britain (GBGB) and the Greyhound Regulatory Board (GRB) have announced an independent and external Review of the industry's anti-doping and medication policy. The aim of the Review is to examine the current policy and future options and to make appropriate and enforceable recommendations that will advance the Boards' commitment to the welfare of the greyhound and the integrity of greyhound racing in the United Kingdom.

Scope

To consider whether the current GBGB anti-doping and medication rules and their implementation can be improved, the Review will examine arrangements in other sports relevant to greyhound racing, consider the science of abused substances and their detection, and the practical application of the sampling and detection policies.

CALL FOR WRITTEN EVIDENCE – 4th November 2009

Introduction from the Independent Panel Chairman, Dr Andrew Higgins:

Thank you for your interest in contributing to the Panel's independent inquiry. We are keen to hear from those directly involved in greyhound racing who have relevant opinions on anti-doping and medication control processes and practices as part of racing's commitment to integrity and the welfare of the racing greyhound.

The Panel invites your responses under the 12 questions listed below in five sections. You may add further comments that you feel may be of assistance to us. However, please keep your answers factual and evidence based although ideas for future policy will also be welcome.

The Panel will invite some responders to meet them for further discussions but clearly the numbers giving oral evidence will be limited so please try to be as specific as possible in your written submission.

Please ensure your submission reaches the Panel Secretary, Peter Laurie, before 30 November 2010. Submissions should be marked and will be treated as 'Private & Confidential' by the Review Panel and may be sent by e-mail, fax or post We will not accept anonymous submissions.

QUESTIONS TO BE ADDRESSED

Please be factual and not anecdotal. We are looking to the future not to the past. Points that you feel are not covered by the questions may be added on a separate sheet. PLEASE TYPE YOUR RESPONSES.

Section A

Rule 217 of the GBGB Rules of Racing states that '*a greyhound when taking part in a race or trial must at that time be free from medicines, tonics or substances that could affect its performance or well being, the origin of which could not be traced to normal and ordinary feeding*'.

1. Do stakeholders fully understand this rule? In some sports the terms 'prohibited substance', 'doping agent' and 'medication substance' are used.
2. Do stakeholders understand the term 'prohibited substance' and the distinction between a 'doping agent' (that has no justification for use in a racing greyhound) and a 'medication substance' that may be used to treat a dog *in training* for a medical condition? Some substances (e.g. feed contaminants) may potentially cause an inadvertent violation of the rules.
3. As some feed contaminants may affect performance, what should be the approach for addressing inadvertent violations that may arise through the consumption of contaminated feed? If you are a trainer, do you check all foodstuff labelling? Have you devised a feeding regime to prevent accidental contamination of your greyhounds?

Section B

Rule 217 of the GBGB Rules of Racing states that '*any tonics, medicaments or other substances administered or applied to a greyhound by a trainer or veterinary surgeon shall be duly recorded in the trainer's Treatment Book*'.

4. Are Treatment Books routinely completed to confirm all medication given? If not, why not?
5. Are the rules on the use of season suppressants and permitted medications appropriate and understood (rule 174i)?
6. Do you fully understand the Elective Testing Service that is currently offered by GBGB and, if so, do you feel it is effective? (Elective testing is not part of racing but provides a system whereby a licence holder can request the Laboratory to test for certain specified prohibited substances in a dog's urine. The results are unofficial, reported confidentially by the Laboratory to the licence holder, and are for the sole use of the license holder. Currently a trainer can request an elective test for two prohibited substances: nandrolone and methylprednisolone).

Section C

Rule 173 of the GBGB Rules of Racing states that '*The local stewards or the licensed veterinary surgeon or the GBGB Stipendiary Steward shall have power at any time to order any examination of and/or test and the taking of samples for test and/or analysis from, any greyhound which is due to take part in or has taken part in any trial or race at, or which is in any licensed kennels. Samples shall only be taken when so ordered.*'

7. How should greyhounds be selected for testing?
8. Do stakeholders understand why and how a greyhound is selected for sampling at a track, what samples are collected and who collects the samples?
9. Is the environment in which, and the process by which, samples are collected on a track secure? Do stakeholders understand the security and confidentiality process that is in place to guard against interference between collection from the greyhound and laboratory analysis?
10. Could the number of samples and the selection of meetings and greyhounds for testing be changed for the better? If so, how?

Section D

Rules 160 and 161 of the GBGB Rules of Racing describe the process and procedures by which the GRB shall hold an inquiry. Persons liable to disciplinary action are listed in Rules 152 and 174.

11. Is the disciplinary process dealing with breaches of rules on prohibited substances understood, fair and consistent? Are the penalties handed down by the disciplinary process for breaches of rules relating to prohibited substances appropriate?

Section E

12. Do you have any other relevant comments to make based on the Scope of the Inquiry above?

Appendix 2

ADMC REVIEW: LIST OF WRITTEN EVIDENCE RECEIVED

E1	Paul Illingworth	Senior Stipendiary Steward, GBGB
E2	Declan Donnelly	Director of Regulation, GBGB
E3	Noel Thompson	Security Co-ordinator, GBGB
E4	Jim Cremin	Journalist, *Racing Post*
E5	Richard Hayler	Acting Chief Executive, GBGB
E6	Simon Gower	Veterinary Director, GBGB
E7	Irene Haselwood	Stipendiary Steward, GBGB
E8	Floyd Amphlett	Journalist and Editor, *Greyhound Star*
E9	Arthur Hammond	Owner
E10	Michael Harvey	Sampling Officer, GBGB
E11	Darrell Hicken	Breeder
E12	Patrick McDermott	Earmarking Steward, GBGB
E13	James Rowe	Licensed trainer
E14	Gordon Strickland	Licensed trainer
E15	Ian Tungatt	Head Kennel hand
E16	John Waldron	Owner
E17	William Hill plc	
E18	Association of Greyhound Track Vets	
E19	Dogs Trust	
E20	Federation of British Greyhound Owners Associations	
E21	National Association of Bookmakers	
E22	Society of Greyhound Veterinarians	
E23	Welfare charities on the UK Greyhound Forum	
E24	Martin White	Assistant Trainer
E25	Racecourse Promoters Association	
E26	Paul Evans	Veterinary surgeon
E27	Bruce Prole	Retired veterinary surgeon
E28	Elaine Parker	Licensed trainer

Appendix 3

ADMC REVIEW: LIST OF THOSE INVITED TO GIVE EVIDENCE IN PERSON

(in order of hearing)

Noel Thompson	Security Co-ordinator, GBGB
Jim Snowden	Security Assistant, GBGB
Paul Illingworth	Senior Stipendiary Steward, GBGB
Declan Donnelly	Director of Regulation, GBGB
Richard Hayler	Director of Policy and Acting CEO, GBGB
Jim Cremin	Journalist, *Racing Post*
Simon Gower	Independent Veterinary Director GBGB and GRB; Licensed Veterinary Surgeon; Veterinary practitioner
Floyd Amphlett	Journalist and Editor, *Greyhound Star*
Nick Savva	Professional trainer
Irene Haselwood	Stipendiary Steward, GBGB
Steve Maynard	Laboratory Director, HFL Sport Science
Hazel Bentall	Former Veterinary and Senior Steward, NGRC
Tom Kelly	Chairman, BAGS
Barry Faulkner	General Manager and Company Secretary ABB
Martin White	Assistant Trainer; Representative of GOBATA
Mick Harvey	Sampling Steward, GBGB
John Haynes	Acting Chairman, FBGOA
Arthur Hammond	President, FBGOA
John Waldron	Secretary, FBGOA
Simon Adams	Chairman AGTV, Licensed Veterinary Surgeon, Veterinary practitioner
Norah McEllistrim	Professional trainer; Chair GTA; Director GBGB
Frances Allen	Vice-President SGV; Licensed Veterinary Surgeon; Veterinary practitioner
Duncan Gibson	Stipendiary Steward, GBGB

Bill Glass	Operations Director, Gaming International; RCPA Director; Director GBGB
John Curran	Director Kinsley Greyhound Stadium; RCPA Director
Simon Levingston	General Secretary, RCPA

Appendix 4

ADMC REVIEW: ANAYSIS OF SAMPLING DATA 2006-2009

	Race Type Sample taken				
	BAGS	Group 1	Trial	Other	Total
2006	3154	350	1689	4824	10017
2007	3412	414	1787	4243	9856
2008	3345	376	1683	3436	8840
2009	3686	430	1616	3430	9162
Totals	13597	1570	6775	15933	37875
Proportions	**36%**	**4%**	**18%**	**42%**	

	Race Type Positives				
	BAGS	Group 1	Trial	Other	Total
	5	3	20	28	56
	14	0	23	43	80
	13	1	8	20	42
	3	2	10	9	24
	35	6	61	100	202
	17%	**3%**	**30%**	**50%**	

	Race Type Sample taken			
	Stipendiary	Sampling Steward	Local	
	2487	6996	534	
	2425	6928	503	
	1959	6506	375	
	2458	6377	327	
	9329	26807	1739	
	25%	**71%**	**5%**	

	Positives detected		
	Stipendiary	Sampling Steward	Local
	16	38	2
	14	65	1
	4	34	4
	5	17	2
	39	154	9
	19%	**76%**	**4%**

Track types	Samples	% Total
BAGS	26490	70%
non-BAGS	11385	30%

Trial samples	Number	Proportion
Stipendiary Stewards	989	15%
Sampling Stewards	5766	85%
Local Stewards	20	0%

Trial Positives		Proportion
2006	20	36%
2007	23	29%
2008	8	19%
2009	10	42%

KEY POINTS TO NOTE:

- **70% of the samples taken are from tracks with BAGS contracts, and about half of these samples are from BAGS races.**
  This confirms the wish to target BAGS races, even though they generate only 17% of the positives.

- **18% of the samples are from trials (including sales trials), but these generate 30% of the positives.**
  This suggests that there should be more samples taken from trials. The number of trial samples taken varies widely from track to track. For example at one track in 2009 there were only 32 trial samples taken, from a total of 479 samples.

- **Although 25% of the samples are taken by the Stipendiary Stewards, these account for only 19% of the positives. The Sampling Stewards have taken the lion's share of the samples and generated more positives than the average.**
  Given the effectiveness of the Sampling Stewards there is solid ground for retaining their role in the future.

- **The Local Stewards took just 5% of the samples, but found 4% of the positives.**
  This suggests that post-race sampling is effective.

- **The proportion of trial samples taken by Sampling Stewards is some 85% of the total.**
  This suggests that the Stipendiary Stewards are not attending enough trial sessions, or are not targeting sufficient trial runners at the tracks. This is despite the evidence that trialists are producing a greater proportion of positives than either BAGS races or Category One finals.

Appendix 5

ADMC REVIEW: ANALYSIS OF PENALTIES FOR THE 200 MOST RECENT POSITIVE CASES

An analysis of the last 200 positive samples has been carried out to try to assess the degree of consistency surrounding the penalties levied by the Disciplinary Committee and previously the NGRC Stewards.

The analysis focuses on the substances that have appeared as positives on at least two occasions and the 155 hearings that had enough commonality to analyse. The maximum, minimum and average fines levied for each substance were then studied. This gave the total range per positive substance.

Highly inconsistent: the range from maximum to average was greater than or approximately equal to 50%.

Inconsistent: the range from maximum to average was less than 50%, but still significant.

Consistent: all others.

This simple analysis (left column, below) shows that of the 155 total positives analysed 59% were either 'highly inconsistent' or 'inconsistent' and 35% were 'highly inconsistent'. This latter group includes cocaine and its metabolite benzoylecgonine, dexamethasone, flunixin, nandrolone and caffeine. The second table (right column, below) lists substances by the average penalty levied.

	Financial Penalty				Additional Penalty		Cases heard
Substance	Max	Min	Average	Variation	Max	Min	
19 Norepiandrosterone	£850	£0	£332	Hugely inconsistent	Severe reprimand	Explanation accepted	14
Caffeine / Theobromine	£1,250	£0	£459	Hugely inconsistent	Severe reprimand	No order	11
Cocaine / Benzoylecgonine	£1,000	£0	£505	Hugely inconsistent	Disqualified	Cautioned	10
Dexamethasone	£750	£0	£371	Hugely inconsistent	Severe reprimand	No order	7
Nandrolone	£1,000	£0	£480	Hugely inconsistent	Warned off	No further penalty	5
Norethindrone	£1,500	£300	£750	Hugely inconsistent	Severe reprimand	Reprimanded	7
Flunixin	£1,000	£250	£655	Inconsistent	Severe reprimand	No further penalty	11
Methylprednisolone	£1,000	£0	£568	Inconsistent	Disqualified	Explanation accepted	11
Morphine	£600	£0	£316	Inconsistent	Severe reprimand	Cautioned	16
Atenolol	£750	£0	£375	Consistent	Licence withdrawn	Severe reprimand	2
Cyclizine	£850	£500	£729	Consistent	Licence withdrawn	Reprimanded	7
Ibuprofen	£600	£400	£514	Consistent	Severe reprimand	Reprimanded	7
Meloxicam	£850	£750	£813	Consistent	Severe reprimand	Reprimanded	4
Pholcodine	£400	£350	£367	Consistent	Reprimanded	Reprimanded	3
Piroxicam	£750	£500	£663	Consistent	Severe reprimand	Reprimanded	4
Stanozolol	£850	£500	£663	Consistent	Severe reprimand	Reprimanded	8
Theobromine	£400	£0	£16	Consistent	Reprimanded	No order	25
Timolol	£750	£750	£750	Consistent	Licence withdrawn	Severe reprimand	3

Substance	Average fine
Meloxicam	£813
Norethindrone	£750
Timolol	£750
Cyclizine	£729
Piroxicam	£663
Stanozolol	£663
Flunixin	£655
Methylprednisolone	£568
Ibuprofen	£514
Cocaine / Benzoylecgonine	£505
Nandrolone	£480
Caffeine / Theobromine	£459
Atenolol	£375
Dexamethasone	£371
Pholcodine	£367
19 Norepiandrosterone	£332
Morphine	£316
Theobromine	£16

Appendix 6

ADMC REVIEW: A PROPOSED YEAR 1 SAMPLING STRATEGY

Sample type	Methodology	Assumption	Strategy	Samples taken	Samples tested
Irish Sales trials	Every greyhound presented for sale	15 meetings, 60 dogs at each	Targetted	900	900
See recommendation 3.4					
Preliminary	Every greyhound presented for registration	Annual number of new dogs	Targetted	10,000	10
See recommendation 3.5. Number of samples tested based on historical data and number of newly-registered greyhounds typically testing positive					
Trials	An agreed number of trials per track	10 per track per month	Random	3,120	3,120
See recommendations 2.2 and 3.4. Based on 26 tracks					
BAGS tracks	Taken from any type of race meeting	20 per track per month	Random	4,080	4,080
See recommendation 2.2 and 3.1. Based on 17 BAGS tracks					
Non-BAGS tracks	Taken from any type of race meeting	10 per track per month	Random	1,080	1,080
See recommendation 2.2. Based on 9 non-BAGS tracks					
Out of competition	Greyhounds tested at trainers' kennels	Probably aimed at Open races	Targetted	720	720
See recommendation 2.7.					
Category 1	All finalists in Category 1 events	36 Category 1 finals each year	Targetted	216	216
See recommendation 2.2					
SKY meetings	Testing at supporting opens on SKY TV	30 meetings, 10 samples at each	Targetted	300	300
See recommendation 2.2.					
Stipendiary	Provision of samples for past offenders	100 samples for seven Stipendiaries	Targetted	700	700
See recommendation 2.2.					
Racing Office	Provision of samples for dogs out of form	50 samples for each Racing Office	Targetted	1,300	1,300
See recommendation 2.2.					
			Totals	**22,416**	**12,426**

		Assumptions	**Cost**		
Current cost	£71.50 per sample of four pooled samples	10,000 samples taken	£715,000		
	£90.50 per sample for single examination	200 pooled samples given flag	£18,100		
	£ 465 per confirmation of positives	50 positives	£23,250		
	£565 for pack of 200 components	8,000 sets of components	£22,600		
	£975 for 200 assembled packs	2,000 assembled packs	£9,750		
			£788,700		
Future costs	£71.50 per sample of four pooled samples	12,426 samples analysed	£887,744		
	£90.50 per sample for single examination	260 pooled samples given flag	£23,530		
	£ 465 per confirmation of positives	65 positives (based on 0.52% rate)	£30,225		
	£565 for pack of 200 components	21,000 sets of components	£59,325		
	£975 for 200 assembled packs	2,000 assembled packs	£9,750		
			£1,010,574	£909,517 (10% discount)	£788,248 22% discount)

Appendix 7

ADMC REVIEW: PRIORITY RESEARCH REQUIREMENTS

1. **Compositing**. To determine whether x4 pooling is appropriate for testing greyhound urine samples or whether this can be increased to x6 or x8 (or more) without losing sensitivity through the dilution effect. A cost-benefit analysis will be required as whenever a positive sample is found in a composite all individual samples then must be screened. A negative sample screening programme must be in place. (Recommendation 7.7).

2. **Thresholds.** To determine what additional thresholds may be required and to arrange for these to be determined. To consider screening limits of detection for certain therapeutic agents. To review already completed studies and discuss prioritisation for establishing excretion data for specified medication, particularly those with detection times close to 7 days. (Recommendation 7.9).

3. **Morphine.** To establish a screening test that distinguishes between morphine originating from administration of the opioid to influence performance and feed contamination. (Recommendation 8.3).

4. **Oestrus suppression.** Following discussions with VMD and the manufacturers, to determine what data must be generated to grant a licence for the use of alternative products, specifically norethisterone and ethyloestrenol. (Recommendations 9.1, 9.4).

5. **Spayed bitches.** In the light of pilot work sponsored by Dogs Trust but not yet reported, to consider the need for further studies to examine whether spaying has an effect on the performance of racing bitches. (Recommendation 9.5).

Appendix 8

ADMC REVIEW: TRAINING AND EDUCATION

The greyhound industry has no minimum standards of competency and knowledge for greyhound trainers. In part this may be because many of the established trainers have years of experience behind them and take the view that there is nothing new for the 'old hands' to learn, and in part it may be because no basic or rudimentary knowledge is required to obtain a greyhound trainer licence.

There is therefore an opportunity to establish minimum criteria for the granting of a GBGB trainer's licence, but GBGB will need to set out and implement a plan of action in order to achieve this objective.

The current training and educational activities of the GBGB are set out on the industry website[28]. The training programmes on offer are voluntary, and figures for the number of trainers, or would-be trainers, receiving such training are unknown. What is known is that the ongoing education of greyhound handlers is not mandatory, and that the annual issue of trainers' licences is not conditional on any proof of training or education in greyhound husbandry. Given this current position, it is difficult to envisage a wholesale embracing of prescribed education on greyhound medication by those most affected by minimum criteria, i.e. the greyhound trainers.

Nevertheless, the opportunity to educate the greyhound trainers, handlers and future trainers in matters of greyhound medication and substances harmful to greyhound welfare should be undertaken as a matter of priority.

Potential distribution of educational materials

The distribution of educational and training materials is unlikely to be a great concern, since currently there are less than 500 professional, and less than 1000 non-professional trainers. The vast majority of these individuals are attached to greyhound tracks.

Each trainer has to subscribe to the GBGB Calendar as part of his/her licence payment, so written articles and papers within the Calendar are a cheap and obvious way to set out the background to this subject. It is also possible to provide written papers, articles or leaflets to the known names and addresses of all trainers and the same mailing list could be used to distribute CDs, DVDs or videos.

The GBGB could run a road show around the 26 tracks. Such a road show could be track by track, or presented in regional centres, depending on the number of trainers and greyhound handlers required to attend.

Each racing paddock at greyhound tracks has the ability to display posters or leaflets, and there is the added opportunity to provide discussion and debate either

[28] See: wwmw.thedogs.co.uk/trainingeducation.aspx

within the paddocks or at the attached greyhound tracks. The benefit of this route is the presence of a Licensed Veterinary Surgeon at every trial and race meeting, thus providing an informed source of information and practical assistance.

The GBGB staff could distribute information and advice, not just at the tracks, but also at kennel visits and inspections. This valuable industry-sponsored source could be backed up by the GBGB website, where information and advice could be provided in more detail.

Lastly, there are the trade press opportunities through the *Racing Post* and the *Greyhound Star*. These newspapers have been very important in the past in distributing information, and their pages already have a wide readership.

Testing understanding of training and education

The current range of understanding of medication and materials, both beneficial and harmful to the greyhound, indicates that there exists a lack of minimum knowledge levels that may damage the industry. The absence of minimum educational criteria as part of the licensing regime is not insurmountable. It would be fairly easy for the GBGB to commission an annual résumé of information provided to the trainers, and to devise a multiple-choice questionnaire to allow the trainer to test his or her understanding of the subject.

To provide a source of reference for information on ADMC, it would be relatively straightforward to maintain an on-line library of papers, materials and information sent to trainers, with a computer-based training course attached. In this way any trainer, or would-be trainer, could refresh their knowledge easily and quickly on a regular basis.

The issue is one of desire by the trainer to add to his or her knowledge and understanding, together with the willingness of the GBGB to introduce minimum standards for this group of licensees.

Probable educational targets

Several groups of individuals are clear targets as GBGB begins to disseminate any new ADMC strategy. The trainers, paddock staff, racing offices, Stipendiary and Sampling Stewards and Licensed Veterinary Surgeons will all need to be aware of the changes, and how they will affect those involved. A simple grid to control the information flow would help to ensure that the right information is in the right place for the right person. An example of this is attached as **Appendix 8.1**.

One individual should be the control point for the information distribution, so that each channel can be properly considered and to prevent unnecessary duplication.

Following the successful distribution of a new strategy, a simple multiple-choice questionnaire should be distributed, to test the knowledge of licence holders who have been given the information. An example is attached as **Appendix 8.2**. Again this should be controlled by one individual, both to prevent the loss of learning points

fed back to the GBGB, and to help design subsequent questionnaires for the follow-up training and education process.

Appendix 8.1 Possible distribution method for information flow.

Group	Methodology	Testing method
All licensed personnel	GBGB Calendar	
All licensed personnel	GBGB Website	CBT
All licensed personnel	Leaflets and posters	
Professional Trainers	GTA	Multiple choice questionnaire
Professional Trainers	Kennel inspections	
Kennel-hands	Track-based meetings	
Licensed Veterinary Surgeons	Specialist publications	
Stipendiary Stewards	In-house meetings	
Racing Office personnel	Track-based meetings	
Paddock staff	Track-based meetings	
Specific licensed groups	Application process	On application form

All licensed personnel would preferably have the opportunity to access the information via the GBGB website, and clearly with such access it would be a simple matter to devise and implement CBT (computer based testing) programmes, whereby the respondent could move from the learning role straight to the testing part at his or her own pace. Currently it is unlikely that all trainers would have computer access.

Appendix 8.2 Example of multiple choice questionnaire.

Anti-drug and medication control questionnaire.

Name …….....

Home address …….....

Kennel address …….....

Licence number …….....

Date …….....

	True	False	Unsure
1. All greyhounds that are entered for a Sales Trial are sampled and tested	☐	☐	☐
2. All greyhounds being registered for the first time must also provide a urine sample	☐	☐	☐
3. The samples taken at the time of registration are securely stored until required for an Inquiry	☐	☐	☐
4. A greyhound testing positive within 3 months of commencing its racing career is compared to its sample taken at time of registration	☐	☐	☐
5. Dogs that test positive within 3 months of commencing their career are not made subject of an inquiry	☐	☐	☐
6. Dogs that test positive within 3 months of commencing their career have the analysis of the			

sample taken at registration taken into consideration when a penalty is determined at an inquiry ☐ ☐ ☐

7. All greyhounds that are positive for a drug or medication in their system are disqualified following the outcome of the inquiry ☐ ☐ ☐

8. Trainers with a second or subsequent positive for a drug or medication will face a substantially increased penalty ☐ ☐ ☐

9. All fines that are levied for drugs or medications found in a greyhound may also take into account the cost of obtaining a confirmatory laboratory test on top of any financial penalty ☐ ☐ ☐

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