



Irish Greyhound Board

Complaints Officer
Broadcasting Authority of Ireland
2 - 5 Warrington Place
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21st August 2019

**RE: COMPLAINT REGARDING RTE INVESTIGATES PROGRAMME –‘RUNNING FOR THEIR LIVES’
26TH JUNE 2019**

A Chara

I am writing on behalf of the Irish Greyhound Board (IGB) to submit a complaint to the Broadcasting Authority of Ireland, in response to the RTE Investigates programme, *Running for their Lives*, broadcast on RTE 1 Television on 26th June 2019. This complaint is submitted following an initial complaint made to RTE on 15th July 2019, regarding its programme and their subsequent response of 13th August 2019. All relevant correspondence is attached with this complaint.

The IGB is firmly of the view that the programme broadcast on 26th June last did not comply with the Broadcasting Act 2009 or the BAI *Code of Fairness, Objectivity and Impartiality in News & Current Affairs in that the programme was biased, selective, imbalanced and unfair*. The IGB notes the presentation on the programme of illegal euthanasia of greyhounds in knackeries and agrees it is in the public interest to show this, which is at the conclusion of the programme. However, the balance of the programme outside of this footage comprised of selective, historic, unbalanced and out of context commentary and footage primarily designed to undermine the Irish greyhound industry. It needs to be noted that much of the content of the programme referred to matters entirely outside of the remit of the IGB, but no effort was made to demonstrate that fact.

A huge amount of disservice has been perpetrated on the overwhelming majority of stakeholders involved in greyhound racing in Ireland, who are involved in the sport in good faith and because of their love of greyhound racing and their greyhounds. A disservice has also been done to those that support greyhound racing in that the inaccurate portrayal of the industry has resulted in sponsors and other parties being targeted based on the content of the programme. The IGB has itself withdrawn sponsorship from the Rose of Tralee Festival 2019 due to those associated with the festival being subject to targeting on social media.

The IGB would make the following comments in relation to the RTE response of 13th August 2019:

The IGB accepts that RTE was correct in highlighting issues arising in relation to knackeries and it was in the public interest that this was done. By way of information, knackeries fall under the remit of the Department of Agriculture, Food and the Marine and not the IGB. The remaining elements of the programme were designed to fit around this centre-piece with the clear pre-determined agenda of undermining the greyhound industry. It is the IGB's view that the tone of the programme was prejudged, and this is demonstrated by the use of archive footage to portray an unfair representation of the Irish greyhound industry



[REDACTED]

[REDACTED]” The IGB sought a copy of all documentation associated with the programme from RTE in order to enable it to follow-up through its investigative processes against any relevant parties in respect of welfare breaches. Regrettably, RTE has refused to provide such footage and has advised that ‘the release of any documentation sought must be pursuant to a Court Order’. Consequently, the IGB cannot conduct any investigations as a result of the programme. This may be impacting on the welfare of greyhounds.

The RTE response outlines a range of measures which have been introduced by the Irish Greyhound Board following the airing of the programme. The IGB, as part of its Strategic Plan 2018 – 2022, published in March 2018, has as a key objective to maintain animal welfare at the centre of the industry. A number of measures and initiatives had already been put in place with a view to progressing this objective. The measures announced following the airing of the programme were necessary to allay significant public concern regarding the Irish greyhound industry following such a biased, unfair and impartial documentary. Many of these proposals were already at an advanced stage of development and some of them were subject to a legislative process in which the IGB was centrally involved. However, they were fast-tracked given the significant adverse public reaction to the presentation of a wide range of issues in the programme.

Regarding the above points, the Irish Greyhound Board has been nothing other than responsible in its management and promotion of the sport in Ireland. It has been a catalyst for and promoter of the Greyhound Racing Act 2019, which has completed its legislative stage and is now awaiting enactment.

The following points correspond with the points in the RTE response of 13th August 2019 and follow the same numerical reference:

1. The reference to the industry breeding 1000% more pups than were required is a misinterpretation and an inaccurate representation of the Preferred Results Ltd. report. The report makes the point that if greyhound racing alone was taken into account 1000% more pups were being produced. The report then goes on to reference the exports to the UK (6,500) and greyhounds for coursing (2,000). The use of the 1000% figure was deliberately intended to portray an industry which was producing 1000% more pups than was required, whereas when activities other than greyhound racing were taken into account, this was not the case. In other words, if there were no exports or coursing activity, the number of pups would not be bred. This was a clear presentation of inaccurate information.

RTE points out that no empirical evidence was presented by the IGB to elaborate on the suggestion that different practices were employed by ‘the significant vast majority of people involved in the greyhound industry’. The IGB has consistently made the point that there is no empirical evidence in the absence of a traceability system. The Preferred Results report is based on estimates, guesstimates and assumptions and this is clearly set out in the report. The basis of the report was not referenced in the programme.

The use of the reference ‘meagre’ in relation to prize money is also incorrect as prize money levels have significantly increased in recent years and would be well in excess of those applicable in the UK. The use of such a word is designed to undermine and downplay the significance of the industry for those participating in it.

2. By way of information, these issues were discussed on Prime Time (RTE 1 TV), live in studio on the day following the broadcast, i.e. 27th June 2019; however the Irish Greyhound Board was not invited to participate in this discussion.
3. The statement made on the programme that "typically a dog's racing career lasts just seven months" is stated without qualification. It is clear from the RTE response that on its own interpretation of the data available to it, the average age at which greyhounds retired was 3.4 years. On the basis, as RTE indicates, that greyhounds begin racing at 18 months (which is incorrect) this would indicate a racing life of some 2 years. This is a clear example of the selective nature of the programme in that it chose to state that the racing career was seven months when quite clearly its own data analysis suggested a racing career well in excess of that.
4. The programme makes no reference to commercial greyhound racing. The opposite is, in fact, the case with the focus being on 'it's a hobby for enthusiasts. It links into the community....' It is clear that in its comments the programme is dealing with greyhound racing as a community activity. It then chose to limit the number of greyhound tracks worldwide to those that are commercially orientated. RTE now argues that "the programme focussed specifically on commercial greyhound racing..." This clearly is not the case and is another example of information being presented in a misleading manner.
5. RTE indicates that it did not cover the economic impact of the greyhound industry as the report by Power Economic Consultants "was not an independent analysis, it was a report commissioned and paid for by the IGB". The Preferred Results Ltd. report which formed a key element of the overall programme was not an independent analysis, as the analysis of racing pools was based on IGB data. It was a report commissioned and paid for the IGB. It is incomprehensible how RTE can cite reasons for rejecting a report on the economic analysis of the industry but yet on the exact same basis fully accept a report for which all the same reasons apply. Omission of key economic analysis is unfair if dealing with commercial greyhound racing and demonstrates that the programme makers were not impartial. This impartiality is further proven by the fact that RTE Investigates rejected one report because it was commissioned by the IGB, but accepted another IGB report, as it suited its editorial narrative.
6. The IGB is not in any way suggesting that the State earns €50M from betting on the greyhound industry. What the IGB is stating is that the betting levy does provide funding from which the Horse & Greyhound Fund allocation can be supported. No reference was made to income from the betting levy during the programme which is an omission of relevant information with the purpose of again presenting an unfair portrayal of the industry.
7. RTE's own statement that "it would be hard to find differences between a greyhound pup and these pups from a similar breed called lurchers" would suggest that lurchers are included in the programme to confuse the viewing public. It is IGB's view that RTE has an obligation as a broadcaster to make clear what the differences are. None were given on the programme. This confused the situation further for those who would be unaware of a distinction between greyhounds and lurchers. By way of information, the IGB has no remit over lurchers. This item was not presented in a clear and accurate manner.
8. RTE appears to accept that "~~REDACTED~~

[REDACTED]. RTE again clearly misrepresents what is obvious here. The question asked (as per their own account) was "so you don't know how many dogs are bred for racing, the ones that don't make the grade you wouldn't know about them, is that it?" This question was honestly answered and it is not the case as appears to be suggested by RTE that 16,000 dogs were bred for racing. While IGB offered a live interview for the documentary, in the absence of accommodating same RTE was obliged to reflect the views of the absent party (IGB) and to do so fairly. This did not occur in this case.

For the record, the IGB was not suggesting there was any edit between the question and the answer from the original interview, but rather that the interview itself was edited in that the entire of the interview was not shown. The manner in which the interview was presented was an attempt to distort the meaning of the original interview.

9. RTE quotes extensively from a letter written by me on 25th June 2018. A copy of same is attached for the information of the BAI. For the avoidance of doubt, the contents of the letter are accurate and the IGB fully stands over same. The letter makes it clear that the approach of Preferred Results Ltd. was rigorous, thorough and professional but points out also that "not all the recommendations are accepted". In a significant omission, RTE fails throughout the programme to point out that Preferred Results Ltd was commissioned to do a business model analysis and by Preferred Results own statement in the Executive Summary of the report that a dog pool analysis was not part of the brief. (see Exec Summary in report (part) of Preferred Results Ltd attached) The documentary portrays a narrative that indicates Preferred Result's main remit was dog pools and breeding when this is not factually correct and is again misleading to the viewer.

In relation to the requests from the Department of Agriculture on 23rd May 2019, it is clear from the correspondence that the Department requested reports relating to 2018. The Preferred Results report was prepared in 2017 but was in any event furnished to the Department for completeness of information. It is factually incorrect to state that the report was only forwarded to the Department when requested.

10. The IGB stands over its position in relation to this item. The RTE response indicated that [REDACTED]. Pups that are engaged in coursing or that are exported directly to the UK do not need to be registered on the Race Management System. It is only when pups are being presented for greyhound racing that they need to be registered on the Race Management System. The presentation of information in this instance is clearly inaccurate.

11. The IGB views this item as very serious. The reference is clearly in the present tense and there is no doubt that the viewer would be presented with the clear impression that the veterinary practitioner was speaking about dogs "who come in". The opening segment on the programme omitted the first part of the sentence and consequently stated "they have so much blood pumped into them that their blood is like treacle" incorrectly conveying to the viewer, in advance of the programme, that the issue is a current issue.

The last recorded instance of EPO by the IGB was in 2005 and if following the programme makers' assertion that the racing life of a greyhound is seven months, clearly no greyhound should be appearing at any veterinary practice in 2019 showing the effects of EPO. By way of further information, the IGB has conducted over 70,000 tests since that time and has invested in state of the art laboratory equipment costing €400,000, capable of detecting

substances at 'parts per trillion'. Given the nature of the specific veterinary evidence outlined in the programme, a check was made with the Veterinary Council of Ireland regarding recorded cases of EPO, whose last such report relates to 2006. The views and content put forward in this case are extremely misleading.

12. The RTE response in this regard indicates that 'the Chairman of the Irish Greyhound Owners & Breeders Federation (IGOBF).... [REDACTED]'. The programme makes no reference to the ongoing dispute between different groupings claiming to be the Irish Greyhound Owners & Breeders Federation. The matter has been adjudicated on by the Seanad Returning Officer and subsequently the issue was referred to the Seanad Appeals Board. This was a material item and should have been disclosed as part of the programme. [REDACTED] attributes a status which is not reflected by the current situation within the IGOBF. This is a clear misrepresentation of facts, is inaccurate and is designed to unfairly impact on the greyhound industry.
13. This issue was explained to RTE in our letter of 15th July. The change in regulations introduced by the IGB in 2015 did not require a trainer to be pursued as an automatic disqualification of the greyhound applied. Again omitting this material information was a demonstration of bias.
14. The IGB would argue that notwithstanding the fact that no charges had been brought against the individual involved at the time of broadcast, the naming of the individual is likely to jeopardise any future prosecution and prejudice related legal proceedings should they occur.
15. The IGB would stand over its assertion that a very selective and flippant reporting of the situation at Mullingar was evident in the programme. The programme implicitly sought to understate the important works undertaken at the Mullingar track and failed to reference the improvement in injury statistics which were known to the programme makers.
16. RTE accepts that the cases relate to either 2011, 2013 or 2015. All such cases were in advance of the micro-chipping regulations coming into effect. One would expect if RTE was aware of "other cases that were not on these logs which have come through rescues..." that these would have been demonstrated in the programme.
17. The IGB does not understand the RTE response in this regard as it does not appear to address the issue raised in our complaint.
18. The treatment of this particular item was again intended to undermine and minimise the efforts of the IGB in relation to welfare. The extent of IGB activity on the specific case was not referenced and the organisation was not treated fairly.
19. The position set out by the IGB is factual and demonstrates the inaccuracy of the statement made on the programme. Furthermore the omission of the funding provided by the IGB to [REDACTED] again undermines the contribution of the IGB to wider greyhound welfare.
20. RTE references an interview on [REDACTED]. It is correct to say that the attendance of the general public at early morning meetings is generally "nil". The meetings are industry meetings and are not marketed to the general public. On the morning of filming at Kilcohan Park Greyhound Stadium there were in excess of 60 people in the main stand watching and

enjoying the racing. The statement that "racing in front of 9 people – 2 of them bookies" is factually incorrect. Greyhound owners and trainers of the 60 dogs racing as part of the race programme would comprise a significant number of people watching racing. Furthermore SIS racing cannot be conducted without a minimum of three bookies being present, which was the case on the morning at Kilcohan Park Greyhound Stadium. This demonstrates further bias, this time in terms of the success of early morning meetings.

21. It is noted that RTE accepts that the item raised was reported as the opinion of a contributor to the programme. RTE made no effort to correct this contribution and at no stage is context provided that the early morning meetings are not extra meetings.

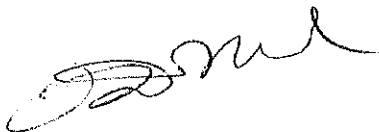
22. It is noted that RTE accepts that "other breeds were involved in the meat trade" in China but clearly the programme deliberately approached the issue on the basis of focussing on greyhounds which was unbalanced and unfair. As regards the contention that "the programme makers are unaware of any involvement of Irish dogs from other breeds in the breeding industry in China" this would seem to be a loose statement as a quick desk top search of breeds other than greyhounds being involved in China is readily available as referenced in the links below.

- <https://www.irishcentral.com/news/dublin-man-admits-to-selling-pugs-as-part-of-asian-dog-meat-trade>
- <https://www.belfasttelegraph.co.uk/news/northern-ireland/45-dogs-rescued-from-chinese-meat-market-by-northern-ireland-couple-charity-37688466.html>
- <https://www.belfasttelegraph.co.uk/news/northern-ireland/northern-ireland-pair-on-mission-to-rescue-dogs-from-chinas-meat-trade-37468247.html>

Overall, the broadcaster failed to comply with the provisions of Section 39 of the Broadcasting Act 2009 and both the spirit and the letter of the BAI *Code of Fairness, Objectivity and Impartiality in News & Current Affairs*. In presenting the documentary 'Running for their Lives' the broadcaster failed to demonstrate fairness, objectivity, impartiality and accuracy to such an extent that the programme constituted a biased and inaccurate portrayal of the Irish greyhound industry.

If any further clarification is required, please do not hesitate to revert at your convenience.

Yours sincerely



Gerard Dollard
Chief Executive Officer

Enc.

Sent by email: complaints@rte.ie
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Irish Greyhound Board

Complaints Office
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RTÉ
Donnybrook
Dublin 4

15th July 2019

RE: RTÉ INVESTIGATES PROGRAMME BROADCAST ON 26TH JUNE 2019

Dear Sirs

I refer to the above programme and wish to formally submit a complaint in relation to the broadcast of the programme on 26th June 2019.

Bord na gCon/The Irish Greyhound Board (IGB) is the statutory body responsible for the management, regulation and development of the Irish greyhound industry. The IGB is extremely concerned regarding the inaccurate portrayal of the industry in the above mentioned programme and is compelled to make this complaint following engagement from various interests within the greyhound industry and community across Ireland.

RTÉ is obliged to comply with the provisions of the Broadcasting Act 2009 and it is the position of the IGB that RTÉ has failed to comply with the overall requirements of the Act and in particular Section 39(1) which requires that "the broadcast treatment of current affairs, including matters which are either of public controversy or the subject of current public debate is fair to all interests concerned, the broadcast matter is presented in an objective and impartial manner...". We are of the strong view that the RTÉ Investigates programme as broadcast on 26th June 2019, failed to comply with the Broadcasting Act 2009.

The programme fell significantly below professional broadcasting standards and contained a large number of factual inaccuracies and mistruths. The IGB believes that it is right the RTÉ would highlight illegal behaviour and the sometimes appalling and egregious treatment of animals as a matter of public interest. The Irish Greyhound Board fully subscribes to and supports such an approach. However, it is incumbent on the national broadcaster to provide factual and properly contextualised information in a manner that is fair, objective and impartial. In no circumstance, can the programme be seen in that light.

A glaring omission from the programme is the good practice and behaviour adopted by the significant vast majority of people involved in greyhound racing in Ireland and the stringent legislative and regulatory framework in place to ensure general compliance and more importantly animal welfare.

It is important to acknowledge RTÉ's invitation to provide an interview for the programme. However, based on the thrust of the questions provided and editorial approach that was being pursued, we took the correct decision for Greyhound racing in Ireland not to participate. We would have been put into a defensive position which in the context of the significant and considerable work we do for greyhound welfare, would have been unfair to us and the industry as a whole. We did offer a live interview, which was declined. We do acknowledge that this did not suit the programme format. However, it underpins that we were not hiding anything. This latter point is further backed-up by the fully open, transparent and co-operative manner of our responses to the reporter's numerous questions.



The programme also showed scant regard for, or reference to, the statutory regulation of the industry and in particular the reforms introduced in the last decade.

I set out below a detailed synopsis of areas where the programme failed to provide any level of balance in relation to the subject matter being discussed and where it presented the material in such a way so as to create a narrative which misrepresented the greyhound industry and which is not true.

I have presented, for ease of reference, the items in the order they appear on the programme with the time associated with each item referenced in brackets.

I would highlight the following:

- A statement is made that 'typically a dog's racing career lasts just 7 months' (1.05). This is entirely incorrect. Racing greyhounds have a typical racing career of 3 years and some greyhounds will race up to 5 and 6 years. This demonstrates a fundamental lack of understanding of the sport by the programme makers, which is a significant cause of concern. RTÉ used the findings of a report by Preferred Results Ltd. as the source of information for this and other points on the programme. This report, while commissioned by the IGB, was not adopted by the Board on the basis it was fundamentally deficient. The above inaccuracy is such an example. The IGB questions the use of a report that has not been adopted, as a basis of research for the programme.
- The programme states that 'Ireland is one of only eight countries where you still find greyhound racing'. (1.50). This is factually incorrect. A simple search of Wikipedia and further basic desk-top research would indicate: 'in addition to the eight countries where commercial greyhound racing exists, in at least twenty-one countries dog racing occurs, but has not yet reached a commercial stage'. https://en.wikipedia.org/wiki/Greyhound_racing. The statement made was inaccurate and purported to minimise the scale of the greyhound industry worldwide.
- The programme accepts that greyhound racing is an industry (1.14) but does not, at any stage, reference the economic impact of the Irish greyhound industry despite being aware of, and in possession of, the report prepared by Power Economic Consultants Ltd. in November 2017, which indicated that the industry provided economic benefit to 12,371 people in Ireland and had an estimated overall annual economic impact of €302m. The omission underlines the impartial nature of the programme and is designed to misrepresent the industry.
- The programme references funding for the industry being 'ring-fenced and coming from the Department of Agriculture' (3.30). No reference is made to the source of funding from the Betting Levy which generated in excess of €50m in 2018 at a rate of 1%. In 2019 the levy has been increased to 2% which should provide an increase in the overall funding pot in 2019. This material omission is another demonstration of a lack of balance and an intention to misrepresent the funding arrangements for the industry.
- Lurchers feature during the programme (initially at 4.29), but at no stage is any distinction drawn between a greyhound and a lurcher. A lurcher is a cross-breed between a sighthound and another breed and is not a registered greyhound. The programme indicates that 'it would be hard to find a difference between a greyhound pup and a lurcher...' The intent clearly is to portray in the public's mind that any dog that looks like a greyhound falls within the responsibility of the Irish Greyhound Board or other bodies. This is a factually incorrect presentation and is designed to misrepresent the position.

- The programme used footage from the Claire Byrne Live interview with the Chief Executive Officer of the Irish Greyhound Board in September 2017 (5.00). The footage is prefaced by a statement that 'the IGB has not confirmed breeding numbers'. The edited footage was used to portray that the IGB was deliberately concealing what the breeding figures were. It was pointed out in correspondence to RTÉ prior to the programme (letter of 21st June 2019 attached as document ref. A) that they were misinterpreting the interview and at no stage was comment made in relation to breeding figures on the Claire Byrne Live programme. Comment was made in relation to the matter of 'unaccounted for dogs' but not in relation to breeding. Another factual inaccuracy.

Later in the segment a question was posed 'so you don't know how many dogs are bred for racing....' The response was that the IGB becomes aware of a dog for racing when it is presented for racing. Greyhounds are bred for other purposes including coursing, export, breeding etc. The programme then went on to indicate that 'there should be no mystery about it' i.e. breeding figures. However, it then states that the responsibility for the Stud Book lies with the Irish Coursing Club who maintain the records for breeding. The segment deliberately misrepresented the interview despite RTÉ being fully aware in advance that that same was being misrepresented.

- The programme refers extensively to a report prepared by Preferred Results Ltd which the programme makers were advised was not accepted by the IGB. The report is based on estimates/guesstimates and assumptions (as clearly set out in the report). In referencing the data (8.52), the context is never outlined or that the findings are disputed. At 10.32 on programme it is indicated that the IGB provided a copy of the report to the Department 'when requested'. This is factually incorrect and was outlined to the programme makers in correspondence of 21st June 2019 (attached as document ref A). The IGB was never requested to provide this report to the Department.
- The CEO of the ISPCA indicates 'thousands of puppies that are born are never registered – simply disappear'' (10.44) All matings of greyhounds and litters are required to be registered with the Irish Coursing Club as Keeper of the Stud Book. Furthermore every greyhound must be microchipped upon it reaching the age of 12 weeks. The statement made is without balance and is left open ended to portray a situation which does not represent the facts. Further contributions by the ISPCA throughout the programme also lack balance and fail to mention the ISPCA's contribution at a meeting of the Joint Committee on Agriculture Food & the Marine on 9th May 2017 where the ISPCA stated 'the number of calls received about registered greyhounds is negligible. We must acknowledge that the majority of dogs kept for racing are looked after in an appropriate fashion' https://www.oireachtas.ie/en/debates/debate/joint_committee_on_agriculture_food_and_the_marine/2017-05-09/4/. This demonstrates a further lack of balance in unfairly presenting relevant information and a deliberate attempt to be biased in approach.
- The veterinary practitioner engaged in the programme is [REDACTED] staff member in RTÉ, which staff member has previously undertaken a Prime Time investigative report on the greyhound industry. This represents a conflict of interest of which the programme makers would have been aware. The veterinary practitioner referenced a 'long term legacy' and then went on to state 'we see dogs who come in and they have so much EPO pumped into them, their blood is like treacle' (11.13)

EPO has not been detected by the IGB since 2005 despite undertaking over 70,000 tests since that time. The statement in the programme to present an historic situation as current practice is grossly misleading and inaccurate and is designed to portray a most negative impression of the industry. It should be further noted, that that Veterinary Council of Ireland has had no recorded case of EPO by any of its members since 2006.

The subject of Doping and Medication forms a significant part of the programme. Nowhere is the level of activity undertaken as part of the IGB testing regime referenced anywhere in the programme. In 2018, 5,288 samples were taken at race events, out of competition testing and unannounced testing at kennels. 22 of these test returned an adverse analytical finding (0.4%). None of the adverse analytical findings identified EPO as a substance. The failure to balance the commentary with relevant data points to the bias inherent in the programme.

- The programme at 13.10 makes reference to a report prepared by ██████████ in 2015 on doping and medication. This was a report specifically commissioned by the IGB. The programme makes no reference to the changes in statutory regulation and other improvements made in 2015 and subsequently on foot of the report. In this regard the programme was biased and sought to present a situation as current without balancing that position with reforms that had taken place. Again neither fair, objective or impartial.
- Reference was made on the programme to a single case of a licence being revoked since 2015 (13.57). In responding to queries from RTÉ prior to the programme the IGB pointed out that a Disqualification Order related to the greyhound and an Exclusion Order to the person. We further pointed out that pursuant to the 2015 regulations a greyhound is automatically disqualified from racing when an adverse analytical finding is declared and it remains disqualified until a clear test, free from prohibited substances, is returned. It is therefore an automatic disqualification process since 2015, so no Disqualification Order requires to be issued. The programme failed to provide the relevant information, despite being in possession of same, on this point.
- The IGB welcomes the statistic outlined in the programme, if it is the case that 80% of animal remedies seized by the Department of Agriculture, Food and the Marine relate to the greyhound industry. This is a result of the regulatory and integrity framework that we have worked hard to achieve and implement. However, a case featured in the programme (17.44) where an individual was specifically identified has yet to be dealt with through the court system; and the highlighting of such specific information could well compromise a successful prosecution in this case. The RTÉ programme was negligent in this regard.
- The programme showed considerable footage of racing at Mullingar Greyhound Stadium (19.10). It referenced official statistics since 2014 and that the highest number of fatalities occurred at Mullingar Greyhound Track. The information provided to RTÉ, email reference 21st June 2019 (attached as document ref.B), stated *'A number of improvements have been made to enhance safety standards at Mullingar track, including the installation of a new hare rail in February 2018. The position of the hare rail was altered around the 2nd bend and back straight, in an attempt to improve the running line the dogs take when entering this area of the track. Mullingar Greyhound Stadium purchased a new tractor with the intention of enhancing track maintenance at the end of April 2018.'*

The programme failed to report the situation in Mullingar in a balanced way but in a somewhat flippant way stated that the IGB had addressed the matter by "installing a new hare

rail and bought a new tractor". It was indicated to RTE that the number of injuries had reduced by 63% since the measures were put in place. But this material fact was ignored.

- The programme featured evidence of ear tampering of greyhounds (20.00 on programme). Footage from BBC Newline in 2013 was used to illustrate the practice. The Board is aware of the historic cases featured in the programme, one from over a decade ago and one from 2013. In 2016, the IGB made it a regulatory requirement and a condition of entry to racing that all greyhounds competing at licenced stadia were microchipped. This ensures that all greyhounds are identifiable and more importantly, linked to an owner. The images of ear tampering were presented as a way of preventing an owner being traced.

The programme failed to make any reference to the national microchipping regulations of 2015 and the IGB regulations of 2016 which had addressed this issue. In failing to do so, the programme neglected to indicate that measures had been introduced through reform of the sector to combat such a practice. The segment then went on to feature further historic footage regarding killing of animals from 2007 (BBC) and from RTE in 2012 and 2014.

- The programme refers to a case in Clonakilty which has been the subject of action by the IGB and other agencies (25.33). In relation to IGB's involvement, the programme states 'later in 2016 the IGB served him with a Welfare Notice because of the condition of his kennels. The IGB said recent welfare inspections have not raised concerns'. The position with regard to this case was clearly set out in correspondence of 21st June 2019 (attached as document ref A).

The statement by the IGB indicated *'The IGB is aware of the specific GBGB decision mentioned here. The IGB inspected the particular premises on 6 occasions in 2016, 2 occasions in 2017, in April 2018 and in February 2019. Apart from an inspection on 1st June 2016 on foot of which a Welfare Notice was issued, no welfare issues were identified on any of the other inspections. On the most recent inspection in February 2019, there were no greyhounds on the premises'*. The attempt on the programme to minimise and deliberately downplay the successful enforcement approach in this case was designed to present a weak approach by the IGB towards welfare breaches. This is unfair reporting.

- The statement that 'The IGB spends just over €100k from the €16.8m it gets from the State on its Irish Retired Greyhound Trust' (34.00) is factually incorrect. The €100,000 reference is a specific contribution that the IGB makes to the special entity that was established to focus on the re-homing of Irish greyhounds – The Irish Retired Greyhound Trust. The contribution is additionally matched by a 2% contribution of winning owners' prize money which in itself derives from the Horse & Greyhound Fund. In 2018 the total income of the Irish Retired Greyhound Trust was €242,000. The statement made was deliberately intended to create the impression that €100k was the amount spent on welfare. This is an unfair and unbalanced representation. The programme makers were advised that the reference to €100k was entirely incorrect (email of 25th June 2019 attached as document ref C). The overall spend of IGB on regulation and welfare matters will be of the order of €2m. in 2019.
- An input on the programme from [REDACTED] fails to make any reference to the fact that the IGB provides funding from its welfare budget to this organisation and other welfare organisations.

- The programme featured footage of the early morning meeting at Kilcohan Park Greyhound Stadium and stated 'racing in front of 9 people – two of them bookies' (35.30). The footage showed a small number of people track-side watching the racing. Three bookmakers were in attendance that morning and an additional 60+ people were in the stadium viewing the race meeting. This was a deliberate attempt to mislead the viewing public in relation to attendance at early morning meetings.
- The statement that 'morning racing virtually guarantees that over breeding will continue' (36.33) is inaccurate and is again provided without any context. It is based on the false premise that 'new meetings' will generate additional demand for greyhounds. This is incorrect. The programme failed to state that early morning meetings have replaced other meetings. Killkenny now schedules racing on a Wednesday morning in lieu of Wednesday night and Kilcohan Park schedules racing for Thursday morning in lieu of the previously scheduled race meeting on a Friday night. No reference was made to this fact on the programme. This is further erroneous and factually incorrect information.
- The programme outlined some appalling practices regarding the treatment of animals allegedly in China. The footage in this case first appeared on the internet in 2015 and the practice was further reported in the Irish national media in 2016. The footage shown in the programme also displayed other breeds of dog but the total concentration in the broadcast related to the treatment of greyhounds. The footage shown was shocking and outlined appalling practices in relation to live animals. Footage at 40.13, 41.22, 42.30 and 43.40 all featured other breeds of dogs as well as greyhounds.

The programme deliberately tries to attribute all poor animal welfare practices to greyhounds and failed to make it clear that this appeared to be a general practice relating to the treatment of live animals and gave no credence to the fact that the IGB or any Irish regulator cannot be responsible for the appalling attitude to wider animal welfare that may be evident in other countries. This was a very unfair misrepresentation on the programme.

There is no reference made on the programme to IGB's clearly stated position regarding exports which was outlined to the programme makers and which has been extensively promoted by the IGB. In its letter of response dated 21st June 2019 (document ref A) the *'The IGB's stated position (statement referenced by you) makes it clear that the Irish Greyhound Board only supports the export of greyhounds to countries that have a strong animal welfare code. The IGB has been involved in ongoing discussions through the International Greyhound Welfare Forum and in other fora regarding the means by which exports can be formally controlled'*. The exclusion of this statement is a further indicative that the programme makers were impartial and lacked objectivity and balance.


In summary, it is clear that the programme makers had a pre-determined agenda in relation to the greyhound industry. Shocking and abhorrent footage obtained at knackereries in 2019 (these facilities fall outside the remit of the IGB) was used as a crescendo for a programme to target the greyhound industry. To generate a programme from one shocking example of animal abuse, the programme makers trawled for historic footage as far back as 2007 and 2013, misrepresented data as fact when clearly it was not, utilised contributors whose contributions in most cases are highly questionable; ignored obvious regulatory reforms in recent years and thus formed a damning indictment of the Irish greyhound industry which does not reflect the reality of the greyhound industry of 2019.

The IGB is convinced that any independent assessment of the programme would clearly indicate that a narrative was constructed to suit a particular outcome. That outcome was to be severely damaging to the Irish greyhound industry by painting a very negative picture based on historic, inaccurate and unbalanced data and coverage. On that basis the programme failed in presenting information in an objective manner and impartial manner; was not fair to all interests concerned and patently failed to meet the minimum standards required under the Broadcasting Act.

The IGB would call on RTÉ to withdraw the programme on the basis of the above failures and put in place suitable redress measures to ameliorate the severe impact on the industry, the greyhound community and the IGB.

I would be obliged to hear from you at your soonest convenience but not later than close of business on Monday 22nd July 2019.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Gerard Dollard', written in a cursive style.

Gerard Dollard
Chief Executive Officer

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