

An Analysis
of
Irish Greyhound Industry Costings & Dog Pool Numbers
Based on Information and Data
originating from
Greyhound Racing Ireland

Prepared by: Raymond O'Hanlon

Company: Preferred Results Ltd.

May 2022

Table of Contents

1. Executive Summary.....	3
2. Conclusions	4
3. Alignment between the PRL Report & IGB Strategic Plan.....	5
4. High Level Review of the JPe Report	9
5. Analysis of Greyhound Numbers	13
6. Analysis of Costings	23
7. Combined Impact of Distorted Volumes & Costings	26
8. GRI's Breeding Centric Model	27

I. Executive Summary

In September 2017, Preferred Results Ltd. (PRL) submitted a 'Commercially Sensitive' report (hereinafter the 'PRL Report') to the Irish Greyhound Board (IGB), since rebranded as Greyhound Racing Ireland (GRI), which was the final act in a consultancy engagement spanning several months, involving a review of the Business Model of the Organisation. Some time later a copy of the report was leaked to an investigative reporter with the national media organisation, 'RTE', which resulted in a documentary entitled '*Running for their Lives*' being broadcast on the popular show: 'Primetime Investigates', on RTE 1 Television. The subject matter of the programme portrayed the industry in a very unfavourable light and triggered a public outcry which was reflected in the widespread media coverage at the time. The revelation which perhaps attracted most attention was the claim made in the programme that some 6,000 greyhounds were being 'culled' each year because they were not of a sufficient calibre to warrant their retention as racing dogs.

In defending the greyhound industry in the aftermath of the programme, IGB made it clear on numerous occasions, in the media and through other fora, that it rejected the findings of the PRL report. Many statements made by GRI during the course of its defence were considered by PRL to be defamatory, which led to the issuing of a plenary summons against the CEO and the Board of IGB. Despite its rejection of the report, on the night of the airing of the documentary, IGB uploaded the portion of the report dealing with the PRL Dog Pool Analysis, and despite the initiation of legal action for defamation, the report remains on the website to this day. Also on the website is a report commissioned by GRI, undertaken by the prominent economist, Mr. Jim Powers, entitled: '*The Economic & Financial Significance of the Irish Greyhound Industry*' (hereinafter the '*JPe Report*', dated July 2021, which positions the Greyhound Industry as being of critical importance to the Irish economy and heritage of the Irish people.

While the PRL Report is dismissed by GRI, greyhound advocacy groups such as '*Campaign Against Greyhound Exploitation & Death*' (CAGED) have drawn on figures contained in the report to promote their work, which, in the case of CAGED has led to it being pressured by the Greyhound Board of Great Britain (GBGB) to desist from relying on the PRL Report on the grounds that figures contained in the report are unreliable. While PRL rejects all such claims, given that court proceedings against GRI remain pending, PRL is not in a position to enter into a defence of numbers contained in its Report, or to address statements made by GRI. However, it is at liberty to respond to a request from CAGED for assistance in responding to the pressure being applied by GBGB, by undertaking a separate body of work on aspects of the GRI Dog Pool, and other matters of interest, based on information and data produced by, or commissioned and approved by, GRI, which is in the public domain.

The two main sources of information for this report are: the JPe Report, and the 'Irish Greyhound Board Strategic Plan 2018 – 2022'. Drawing on data contained in these reports a different approach is taken to the one taken in the PRL Report for the IGB. Nevertheless, the overall findings are the same, including the finding that under the Breeding Centric Model employed by GRI in the management of the Racing Greyhound Dog Pool, that an annual surplus of some 6,000 greyhound pups is created. Those Pups still can not be accounted for, because, despite legislation having been introduced to make it possible, a system of traceability has still not been implemented to track Pups which have not been entered onto GRI's Race Management System.

In writing this report the author acts as a guide, pointing out facts and figures in the abovementioned reports (primarily), and running them through an analysis process with the underlying logic explained. In that way, they reader does not have to take the author's word for the findings contained herein and he/she can go to the source of the data and check for himself/herself.

2. Conclusions

- In its 'Irish Greyhound Board Strategic Plan 2018 – 2022', the then IGB set out a new strategic goal of adopting a "Racing Centric" Dog Pool Management Model, which would allow it to dramatically reduce the number of greyhounds produced by the industry and to reduce rehoming costs.
- In the same Strategic Plan, the IGB also reaffirmed its commitment to its Breeding Centric Model, which aims to improve the 'quality of racing' by maximising the numbers of pups produced through the offering of breeding incentives.
- Given that the Strategic Plan contained two conflicting goals only one could be acted upon. The figures presented in the JPe report confirm that it was the Breeding Centric Model which won out.
- Drawing on figures taken from the JPe Report and the IGB Strategic Plan 2018 – 2022, it can be demonstrated, based on the 2019 figures provided, that the GRI Breeding Centric Model results in approximately 6,000 Surplus Greyhound Pups each year, which are not accounted for due to a lack of traceability.
- While unaccounted-for pups are included in the costings set out in the JPe Report up to the age of 24 Months, thereafter, no costs are presented for unaccounted-for dogs. It would appear that:
 - They were overlooked in the costings exercise
 - They were all exported without a trace
 - They are considered to have ceased to exist after 24 months
- The export value of some 6,300 Irish Greyhounds which are registered each year with the Greyhound Board of Great Britain (GBGB), is a fraction of the cost of producing those greyhounds.
- The primary beneficiary of the Irish Racing Greyhound Industry appears to be the British Racing Greyhound Industry, which enjoys the benefits of a continuous supply of below-cost greyhounds, without the responsibility or cost of caring for greyhound pups which fail to achieve a level of performance which allows them to race.

3. Alignment between the PRL Report & IGB Strategic Plan 2018 – 2022

As the PRL assignment with IGB was nearing conclusion, the preparation of a new strategic plan by the Board of IGB was already underway. While PRL had no direct involvement with the strategy development process, during the course of IGB Business Model Analysis project, it had worked closely with the Senior Management Team and had made a number of presentations to the Board. In this section the main similarities between the IGB Strategy and the recommendations in the PRL Report are highlighted. Given that both the IGB Strategic Plan 2018 – 2022 and the PRL Dog Pool Analysis are in the public domain, interested parties could undertake the same review for themselves. This section simply saves them time in doing so.

Adoption of a Racing-Centric Dog Pool Model

The most critical conclusion of the Dog Pool analysis undertaken by PRL was that the Model of the Greyhound Industry presided over by IGB, was a *'Breeding-Centric Model'*, as opposed to a *'Racing-Centric Model'*, and that in order to mitigate the risk of the industry being shut down following the anticipated introduction of traceability of greyhounds, that the IGB should immediately move towards a *'Racing-Centric Model'*. The models can be defined as follows:

- A Breeding Centric Model creates value by producing the maximum number of pups possible each year, to increase the 'quality' of the racing product by selecting only the fastest dogs for the Racing Dog Pool. That creates excitement and entertainment for Customers, especially the betting public, and keeps Breeders, Owners and Trainers committed to the sport, as they live in hope of a rags-to-riches transformation in their lives by producing that elusive Derby winner. The downside of the model is that it results in a surplus of greyhounds.
- Racing-Centric Model
A Racing-Centric Model creates value by ensuring closely matched dogs at every grade, producing as many excitement-filled photo-finish races as possible, as is the case of BAGS Racing in the UK. Owners are rewarded for their participation, prizemoney is modestly attractive, and rags-to-riches dreams are a thing of the past. With participation of greyhounds based on qualifying times and not on speed, the careers of greyhounds are greatly extended, which means that far fewer greyhounds are required to sustain the industry.

PRL Critique of Breeding-Centric Model

Page 48 of the PRL Report provides a summary of the downside of the Breeding-Centric Model:

- Prize Money and other incentives stimulate over-breeding, and the resulting culling could close the industry down
- Dog Pool size and culling of dogs out of control and blanket rehoming of culled dogs impossible
- Regulation focused on Racing, leaving Breeding pretty much to its own devices
- The Industry is failing from both a commercial and a Regulatory point of view

PRL Review of the Racing-Centric Model

Pages 51 to 65 of the PRL Project Report set out:

- Reasons why a Racing-Centric model is the only sustainable model for the industry
- And, Proposed Changes

Essence of the proposed changes:

- Minimize the size of the Dog Pool
- Stop the below cost dumping of dogs into the UK
- Embrace traceability and look after every dog

IGB Commitment to Adopt a Racing-Centric Model

The decision by the IGB Board to accept the PRL proposal to adopt a racing-centric model is captured in the executive summary of the Strategic Plan (page 5):

*'The Plan has a key focus on the organization being a **racing-centric organization** with integrity and welfare considerations at its core '*

Having made the critical decision to change the industry model, the strategy development team followed up with a series of proposed changes in support of the new model which coincide with proposals put forward by PRL:

- i. Extend the 'racing life' of dogs
- ii. Race Card Rebalancing
- iii. Whole of life approach
- iv. Creation of a Racing Stud Book
- v. Other Proposals

i. Extend the racing life of dogs

On page 33 of the Strategic Plan, under the heading 'Extended Lifetime', the text reads:

*'Historically, there has been a focus on dogs in the 18-48 months categories [average = 33 months] i.e. the age when Greyhounds typically hit peak speeds. **By extending the 'racing life' of dogs to circa 72 months we will ensure that (a) less dogs are required (b) that the post-racing career of dogs is shorter.** To make this happen (c) all race cards would have at least one event for 'senior' dogs (and one even for bitches) – ensuring that slightly older dogs become a recognized part of the dog racing fraternity. These proposals will be further examined, in conjunction with the industry, and progressed during the lifetime of this strategic plan'.*

PRL's version of the same proposal is set out on page 57 of its Project Report under the heading of: 'Minimize the size of the Dog Pool'

- Dogs should race A10 to A10 so long as the Dog is not negatively impacted
- Dogs should be retired based on not holding qualifying times, or based on Health
- Dogs with Qualifying Times and in Good Health, should not be permitted to be put to sleep
- IGB should work with Breeders, Owners and Trainers to improve the level of care, health and schooling of Dogs in order to qualify more dogs and to maximise their retention as Racing Dogs

ii) Race Card Rebalancing

A decision to extend the racing life of Greyhounds cannot work without a rebalancing of the Racing Card and a redistribution of prizemoney to financially support Greyhounds racing in the lower grades.

That point is recognized on page 34 of the Strategic Plan under the heading of ‘Card Rebalancing’, where it is stated:

‘At the present time (for historical reasons), prize money is weighted in favour of dogs that compete in the fastest possible times. During the lifetime of this strategic plan, we will assess prize money schemes to incentivize greyhounds ranked at the A4-A10 categories in order to extend their racing career and improve the economic viability of them remaining in the greyhound industry’.

The rebalancing of Race Cards and Prizemoney is covered by PRL on page 63 of the Project report where it is stated:

- Appearance Payments
 - An appearance payment should be made for each Dog entered in a race and for Reserves
 - Appearance fees should be based on Standard cost Calculations for the maintenance of an A10 Dog
- Races
 - Manage the mix of Races to give each qualifying dog a minimum chance of racing 60% of the weeks in a year
 - Manage the grading of races to create equal opportunities for dogs in the race
- Prizemoney
 - Rebalance the rewarding of Prizemoney to reflect the normal performance curve of dogs over their racing lives
 - Decouple Trainer payments from prizemoney and leave the negotiation of Trainer Fees to market forces.

iii) Whole of Life Approach

Under the heading of ‘whole of life approach’ set out on page 33 of the Strategic Plan, it states:

‘We will develop a whole of life approach to greyhounds and communicate this to the general public. IGB own the responsibility for the welfare of all racing greyhounds. Every Greyhound is valued - regardless of on-track performance – a message that has to be sent loud and clear across the industry’.

The PRL version of the ‘Whole-of-Life’ approach, was ‘No-Dog-Left-Behind’, which is presented on page 58 of the Project Report, where it is stated:

- Embrace Traceability and use to promote the industry in a positive light
- Pups failing to achieve qualifying times should be rehomed
- As soon as a Dog is Retired, the Owner should be paid a re-homing fee until such time as the Dog is rehomed
- Only retired dogs should be used for breeding in order to minimise the Dog Pool
- Breeding Stock should be rehomed when retired from breeding

iv) Creation of a Racing Stud Book

On page 32 of the Strategic Plan, Under Pillar 4, IGB sets out a medium-term objective for the creation of a 'Racing Stud Book':

'Given the specific requirements of the greyhound racing sector, the industry will seek to move towards a position where the racing greyhound is recognised as a distinct breed. A medium objective of this plan is to create a 'Racing Stud Book' to cater for the racing greyhound'

The PRL proposal for the creation of a separate Racing Stud Book is set out on page 65 of the Project Report:

'Decouple IGB from ICC [Irish Coursing Club] by establishing an 'Irish Greyhound Racing Stud Book'

v) Other Proposals

While other proposals put forward in the PRL Report were incorporated in the IGB Strategic Plan the sections of the report covering those proposals have not been published by Greyhound Racing Ireland on its Website and will not be discussed at this time for legal reasons.

Conclusion of the IGB Strategic Plan

In announcing that it would move to adopt a Racing Centric Model to reduce the number of greyhounds, IGB was recognising that the level of surplus pups produced by its Breeding Centric Model was unsustainable and needed to be addressed.

4. High Level Review of the JPe Report

In July 2021, a report which had been commissioned by GRI to show the industry in a positive light was completed by Jim Power economics. The report was titled: *'The Economic & Financial Significance of The Irish Greyhound Industry'*, was completed and submitted to GRI. The opening sentence of the Executive Summary on page 2 reads: *'The greyhound industry is an important part of the social and economic fabric of rural Ireland. It supports considerable employment directly and indirectly down through the supply chain, and it is an important 'way of life' for greyhound owners around the country. For stakeholders in the sector, it is an important economic and social activity'*. That statement establishes the tone of the report.

€117.79 million Greyhound Pipeline

Of most relevance to PRL in terms of analysing the Racing Greyhound Dog Pool, is Section 4 of the JPe Report, which deals with the 'Economic Contribution of the Industry', in particular, the section entitled: *'Cost of Rearing and Racing Greyhounds'*.

Based on Greyhound Numbers and Costs for the year 2019 provided by GRI, Mr. Power concluded that: *'The total cost to greyhound owners each year of keeping the 'greyhound pipeline' in operation is around €117.79 million. This is a significant amount of expenditure, and much of it is injected into local economies and supports thousands of local jobs'*. The makeup of that figure, which is presented in Table 4, on page 21 of the Report, is reproduced below.

Table 4: Cost of Preparing & Racing Greyhounds

ACTIVITY (2019)	COST
BREEDING (3,500 GREYHOUND BITCHES)	
Stud Fees	€3.38m
Keeping Brood Bitch	€7.28m
LITTER TO 12 WEEKS (15,600 PUPS)	
Rearing, Including veterinary costs	€3.90m
Registration with ICC	€0.43m
LITTER 12 WEEKS-52 WEEKS	
Rearing Programme, Including veterinary costs	€18.7m
TRAINING 12 MONTHS-24 MONTHS (14,000 PUPS)	
Registration & Naming with ICC	€0.35m
Training Costs	€25.00m
Travel	€10.00m
Trial Fees	€1.00m
Race Entry Fees	€0.55m
Transfer Fees effected at ICC	€0.25m
Veterinary Care	€11.00m
24 MONTHS-RETIREMENT - 48 MONTHS (4,500 GREYHOUNDS)	
Training Costs	€16.4m
Travel	€8.00m
Trial Fees	€1.00m
Race Entry Fees	€0.55m
Veterinary Care	€10.00m
TOTAL OUTLAYS	€117.79m

Source: Rásaíocht Con Éireann

Reworking of the Numbers

The numbers as presented in the table are not easy to follow, because only total values are presented, as opposed to a cost per greyhound, and because the number of greyhounds involved vary by stage of the pipeline. With the objective of facilitating an easy-to-follow analysis of the numbers, the same values are presented in a revised layout in Table A below, with an additional column showing the Euro Cost per pup.

Costings to 24 months

The costings in the '€m' column are exactly the same as in Table 4 of the JPe Report. The values in the additional column of 'Euro X Pup to 24 mths', are calculated by dividing the values in the '€m' column, by 14,000, which gives the average cost per pup. The total average cost per pup works out to be €5,864.

Stage	No. of Pups	Age (Months)		Cost Item	€m	Euro x Pup to 24 mths
		From	To			
Breeding	-	-	-	Stud Fees	3.38	241
				Keeping Brood Bitch	7.28	520
Rearing	15,600	0	3	Rearing, Including veterinary costs	3.9	279
				Registration with ICC	0.43	31
Rearing	15,000	3	12	Rearing Programme, Including veterinary costs	18.7	1,336
Training	14,000	12	24	Registration & Naming with ICC	0.35	25
				Training Costs	25	1,786
				Travel	10	714
				Trial Fees	1	71
				Race Entry Fees	0.55	39
				Transfer Fees effected at ICC	0.25	18
				Veterinary Care	11	786
Total Outlay					81.84	5,846

In practice, it is not the cost per pup which is most relevant to the owner, but rather, it is the cost of rearing the Litter. Applying the ICC Standard of 6 pups per litter and allowing for 10% mortality, the cost to an owner of rearing a litter to 24 months of age, works out at €31,568.

Costings from 24 to 48 Months

Table B was constructed by applying the same approach as above, but this time the 'Euro per Pup' is calculated by dividing each of the '€m' values taken from Table 4 and dividing them by the 4,500 pups deemed to have entered the racing pool.

Stage	No. of Pups	Age (Months)		Cost Item	€m	Euro x Pup to 24 mths
		From	To			
Racing	4,500	24	48	Training Costs	16.4	3,644
				Travel	8	1,778
				Trial Fees	1	222
				Race Entry Fees	0.55	122
				Veterinary Care	10	2,222
Total Outlay					35.95	7,989

Cost of ownership of s Racing Greyhounds to 48 Months

Table C combines Tables A and B, in order to determine the average cost of ownership of a single Racing Greyhound to 48 months. Based on the figures in the JPe Report, the average pipeline cost of a racing greyhound to 48 months, works out at €18,187.

Stage	No. of Pups	Age (Months)		Cost Item	€m	Euro x Racing Greyhound
		From	To			
Breeding	-	-	-	Stud Fees	3.38	751
				Keeping Brood Bitch	7.28	1,618
Rearing	15,600	0	3	Rearing, Including veterinary costs	3.9	867
				Registration with ICC	0.43	96
Rearing	15,000	3	12	Rearing Programme, Including veterinary costs	18.7	4,156
Training	14,000	12	24	Registration & Naming with ICC	0.35	78
				Training Costs	25	5,556
				Travel	10	2,222
				Trial Fees	1	222
				Race Entry Fees	0.55	122
				Transfer Fees effected at ICC	0.25	56
				Veterinary Care	11	2,444
Racing	4,500	24	48	Training Costs	16.4	3,644
				Travel	8	1,778
				Trial Fees	1	222
				Race Entry Fees	0.55	122
				Veterinary Care	10	2,222
Total Outlay					117.79	18,187

Initial Conclusions

One does not need to be an expert in the rearing or greyhounds to know that it is simply not credible to claim that it costs €31,568 to rear a litter of pups to 24 months, or that, on average, owners spend €18,000 on just a single racing greyhound from their initial breeding to their retirement at 48 months. There are three possibilities with respect to the numbers:

- The numbers for greyhounds are incorrect
- The costings are incorrect
- Both the number of greyhounds and the costings are incorrect

5. Analysis of Greyhound Numbers

A review of the greyhound numbers reveals that the volume data relating to the Racing Greyhound Pipeline are distorted in three significant ways:

- The size of the Dog Pool is overstated
- The Average length of a 'racing career' in the Irish Racing Greyhound Dog Pool is overstated
- The commencement of racing careers has been delayed

While each of these distortions have the effect of justifying more of the dogs passing through the pipeline, the inevitable consequence is that the costings provided are grossly inflated.

Overstatement of the Racing Greyhound Dog Pool

Using figures provided in Table 4 and the supporting notes contained in the same section of the Report, Table D has been constructed to take a first look at how the numbers provided for the Racing Greyhound Pipeline balance.

Table D Greyhound Numbers as Given	
Brood Bitches	3,500
Mated Bitches	2,619
Active Bitches	75%
No of Litters	2,600
Pups per Litter	6
Pups @ 12 Weeks	15,600
Mortality %	10%
Mortality Pups	1,600
Pups at 24 Months	14,000
Entry into Dog Pool	4,500
Not explained	9,500

The only indication of what happens to the 14,000 pups which are reared to 24 months of age, is that 4,500 of them are deemed to have entered into the Racing Dog Pool in Ireland and remain as part of the pool until they retire at the age of 48 Months.

While it is quite possible that out of a population of 14,000 Pups from a given year that 4,500 of them would have entered the Dog Pool over a period of two years, as illustrated in Table E, it is not possible for those greyhounds to remain in the Dog Pool until they are 'retired' at 48 Months, without grossly overstating the size of the Racing Greyhound Dog Pool.

Table E Dog Pool Size based on GRI Figures			
Age (Months)	Year		
	0	1	2
24 - 36		4,500	4,500
36 - 48			4,500
Total Dog Pool		4,500	9,000

For the purpose of simplifying the explanation of the figures, it is assumed that there are no greyhounds in the Dog Pool at the outset of running the GRI numbers through the model. That assumption has absolutely no impact on the conclusions of the analysis.

- Year 1
4,500 Pups born in Year X, enter the Dog Pool at which point there are only Year 1 dogs in the Dog Pool.
- Year 2
A new wave of 4,500 pups born in the following year, Year Y, enter the Dog Pool, joining the 4,500 dogs from Year 1, resulting in a total Dog Pool figure of 9,000 dogs.
- Year 3
In Year 3 another batch of 4,500 pups enter the Dog Pool, but with the retirement of the 4,500 greyhounds from Year 1, the Dog Pool remains constant at 9,000 greyhounds

The difficulty with a figure of 9,000 for the size of the Dog Pool, is that the actual size of the Dog Pool is less than 50% of that figure.

The figures for the number of Greyhounds in the Dog Pool at any given time are not calculated by third parties based on estimates, guesstimates, or assumptions. They are established through the Race Management System managed by GRI Staff who are tasked with providing those figures to the members of the Bord of the organisation in advance of board meetings. While the size of the Dog Pool fluctuates somewhat from one measurement point to the next throughout a given year, and it also fluctuates between one year and the next, as can be observed on page 14 of the PRL Report, it fluctuates within a relatively narrow range of a few hundred dogs. For the three years 2013, 2014, 2015, the average size of the Dog Pool was 3,650, with a maximum value of 3,894, and a minimum value of 3,445. With numbers trending downwards over the years in line with the reduction in the number of stadia, it would appear most unlikely that the figure could have reached even 4,000 greyhounds at the time the JPe Report was published. However, that is a figure which could be readily checked.

For the purposes of this analysis, the figure for the size of the Dog Pool will be rounded up to 4,000 greyhounds. That means that, on average, only 2,000 greyhounds per year could enter the Dog Pool were they to remain there for an average of 48 months. That means that the figure of 4,500 for the number of greyhounds entering the Dog Pool each year, is overstated by 2,500 greyhounds, which, at this point, cannot be accounted for.

Overstatement of Racing Career Duration

Assuming the figure of 4,500 for greyhounds entering the Dog Pool is correct, it means that 4,500 greyhounds are rotated through the Dog Pool of 2,000 Greyhounds in size, in 48 months. If all of those greyhounds were rotated in just 1 year, they would be in the pool for an average of 5.33 months ($2,000 \div 4,500 = 0.44$ of a year, or 5.33 months). Therefore, in a two-year interval, the average length of stay of a greyhound in the Irish Racing Greyhound Dog Pool is 10.66 months, as opposed to the 24 months indicated in Table 4.

One way to view the extent of the distortion of the numbers, is to multiply the number of dogs by the number of months, to calculate the number of 'Dog-Months', for the data presented in Table 4 ('As is' calculation), and to repeat the calculation using the actual average number of months in the Dog Pool.

As is calculation: $4,500 \times 24 \text{ months} = 108,000 \text{ Dog-Months}$

Corrected Calculation $4,500 \times 10.66 \text{ months} = 47,970$

% Inflation of volumes 225%

Delayed Commencement of Racing Careers

On page 33 of the IGB Strategic Plan 2018 – 2022, under the heading ‘Extended Lifetime’, it is stated that:

‘Historically, there has been a focus on dogs in the 18-48 months categories i.e. the age when Greyhounds typically hit peak speeds.

In keeping with that statement, the pipeline period 12 to 24 months presented in Table 4, Race Entry Fees are shown as costing €0.55m, confirming that pups in this category do in fact compete in races. However, pups are not recognised as having entered the Dog Pool until the next Pipeline Period of 24 to 48 Months.

Setting the cut-off point at 24 months as opposed to 18 months provides cover for applying the figure of 14,000 pups to the section. However, in practice, between 18 and 24 months many pups will have already been exported to the UK, and many more which have not joined the Irish Racing Greyhound Dog Pool, and have not been exported, will have joined the pool of Surplus Dogs, which, without a system of traceability in place, can not be accounted for. Therefore, to apply the figure of 14,000 pups to this section is a complete overstatement of the number of greyhounds. Just how big an overstatement it is can not be calculated until the Net Requirement for Pups, and the number of surplus pups has been calculated.

Determining the Net Pup Requirements and Surplus Pups using GRI Data

In order to determine the number of surplus pups in the pipeline the ‘net’ greyhound requirements must be established for:

- i. Dog Pool Replenishment
- ii. Exports
- iii. Breeding Stock Replenishment

‘Net’ requirements mean the number of dogs required when each dog is used to its potential within all animal welfare regulations. Once the Net Requirements have been established, the ‘Surplus’ of pups is calculated by subtracting that Net Value from the 14,000 Pups registered in the system.

i. Dog Pool Replenishment

The turnover of the Racing Greyhound Dog Pool is driven by a range of causes, which include:

- Replacement in cases of illness/injury/death
- Slower Dogs are displaced by faster dogs starting out on their careers
- Dogs are exported to the UK
- Dogs are removed for Breeding
- Other infrequent reasons

It is a mix of these causes which see the 4,500 greyhounds referred to above rotate through the Racing Greyhound Dog Pool between 18 and 48 months of age.

In order for the Dog Pool to remain at a certain size, on average, according as one greyhound from the Dog Pool exits, it is replaced, in the vast majority of cases, by another greyhound starting out on its racing career. One exception which occurs is when greyhounds which were being used for breeding are returned to racing.

The replacement of a greyhound in the Racing Greyhound Dog Pool is not as simple as a one-for-one swap. In order to replace a single greyhound, more than one greyhound must be bred so as to allow for an omnipresent percentage of underperforming/unsuitable greyhounds.

How the Breeding Centric Dog Pool Works

The minimum entry requirement for a Dog to be permitted to race is that it should hold what is referred to as a 'Qualifying Time', which is indicated by the red line in the Table F below. To the left of that line is the 'NG' (No Grade) column (a term applied for the purposes of this explanation). It is observed in the example that, Pups 3 and 7, have failed to produce Qualifying Times and as a result, will join the pool of Surplus Greyhounds.

Dog Type	Dog No	Unaccounted-for					Racing Dog Pool										New	Retired	
		NG	A10	A9	A8	A7	A6	A5	A4	A3	A2	A1	A0	A1	A0	AA0			
Greyhound Pups	1								1									1	
	2						1											1	
	3	1																0	
	4				1													0	
	5								1									1	
	6										1							1	
	7	1																0	
	8			1														0	
	9											1						1	
	10									1								1	
Racing Greyhounds	1						1												1
	2						1												1
	3						1												1
	4						1												1
	5						1												1
	6						1												1
Total Change																	6	6	
Net Change																	0		

Under the Breeding Centric Model operated by GRI, just because a greyhound produces a qualifying time, it does not mean that it will be used for racing. It all depends on how fast a time it holds, versus owner-defined requirements. In Table F, the threshold grade set by the owner is shown in Orange, which, for the purposes of the illustration, has been set at an A6 Grade. Some owners may be satisfied with an even lower grade, while others will be even more demanding. Based on the threshold grade shown in the Table F, Pups 4 and 8 will not enter the Racing Greyhound Dog Pool, despite them holding qualifying times. Instead, they will join the pool of surplus greyhounds, or they could possibly be exported.

Pups 1,2,5,6,9,10 meet or exceed the minimum threshold set by the owner and will enter the Racing Greyhound Dog Pool, displacing 'Racing Greyhounds' 1,2,3,4,5,6, which are 'retired', while still holding grades which exceed the minimum Qualifying Time (equivalent to an A10 grade). While some of these retiring greyhounds may never race again, many more will be exported to the UK where they will be raced for several more years. The greyhounds which are not exported will either be used for Breeding or will join the pool of surplus greyhounds.

Complicating matters further, in terms of determining the number of greyhounds which are surplus to requirements, some greyhounds may be exported to the UK without ever passing through the Irish Racing Greyhound Dog Pool.

What drives the level of surplus greyhounds is the rate of replacement of greyhounds already in the Racing Greyhound Dog Pool. The faster the rotation of dogs through the Dog Pool, the greater the resulting surplus created. In the analysis above it was established that the average period of time a greyhound spends in the Dog Pool is 10.66 months, which means that the pool is being turned over 1.13 times per year.

Without a system of traceability in place it is impossible to know which dogs were exported to the UK without entering the Irish Racing Greyhound Dog Pool, which ones were exported to the UK following their retirement from the Irish Racing Greyhound Dog Pool, which ones joined the Breeding Dog Pool following their retirement, and which ones became surplus to requirements. The question to be answered, however, is not *which* dogs became surplus to requirements, but rather, *how many* of them became surplus to requirements.

How the Racing Centric Dog Pool Works

In order to determine the surplus of greyhounds generated through the Pipeline, one needs to start by establishing the number of Greyhounds required to sustain the Dog Pool when greyhounds are used to their potential, in compliance with animal welfare regulations. What that would look like is illustrated in the table below.

Table G																		
Illustration of the Racing Centric Model																		
Dog Type	Dog No	NG	A10	A9	A8	A7	A6	A5	A4	A3	A2	A1	A0	A1	A0	AA0	New	Retired
Greyhound Pups	1								1								1	
	2						1										1	
	3	1															0	
	4			1													1	
	5							1									1	
	6									1							1	
	7	1															0	
	8		1														1	
	9											1					1	
	10								1								1	
Racing Greyhounds	1	1																1
	2	1																1
	3	1																1
	4	1																1
	5	1																1
	6	1																1
	7	1																1
	8	1																1
Total Change																	8	8
Net Change																	0	

In Table G, the Orange Line has been removed, and the cut-off point for greyhounds entering and leaving the Racing Greyhound Dog Pool is a *Qualifying Time (A10)*, marked by the red line. That means that Dogs 4 and 8 now have a 'racing career', and Racing Greyhounds 1,2,3,4,5,6 would not be retired for another number of years, whenever they dropped below a *Qualifying/A10 Time*. The impact which that would have on the length of the racing career of a greyhound is captured on page 33 of the IGB Strategic Plan 2018 – 2022, under the heading 'Extended Lifetime':

‘Historically, there has been a focus on dogs in the 18-48 months categories i.e. the age when Greyhounds typically hit peak speeds. By extending the ‘racing life’ of dogs to circa 72 months we will ensure that (a) less dogs are required (b) that the post-racing career of dogs is shorter.

Calculation of Net Requirements for Dog Pool Replenishment

For the purposes of this analysis, using a racing greyhound to its potential is taken as racing the greyhound to 72 months of age as proposed by IGB, and which typically happens in the racing industry in the UK. Leaving the number of stadia, the number of races, and the size of the Dog Pool unchanged so as to not impact on the current level of animal welfare, if GRI were to act on its commitment to migrate to a Racing Centric Model, Table H shows how that change would reduce the number of greyhounds required to sustain the Dog Pool of 4,000 greyhounds, to approximately 1,000 greyhounds per year.

Age (Months)	Year				
	0	1	2	3	4
24 - 36	-	1,000	1,000	1,000	1,000
36 - 48	-	-	1,000	1,000	1,000
48 - 60				1,000	1,000
60 - 72					1,000
Total Dog Pool	-	1,000	2,000	3,000	4,000

Guided once again by the statement in the IGB Strategic Plan that: *‘Historically, there has been a focus on dogs in the 18-48 months categories’*, the Dog Pool numbers are adjusted in the table below to reflect that fact that greyhounds typically commence their racing careers at 18 months and not at 24 months as implied in the JPe Report. That reduces the number of greyhounds required per year to replenish the Dog Pool to 889 pups.

Age (Months)	Year					
	0	1	2	3	4	5
18 - 30	-	889	889	889	889	889
30 - 42	-	-	889	889	889	889
42 - 54	-	-	-	889	889	889
54 - 66	-	-	-	-	889	889
66 - 72	-	-	-	-	-	444
Total Dog Pool	-	889	1,778	2,667	3,556	4,000

ii Exports

Page 16 of the PRL Report cites data provided by GBGB for the number of Irish Dogs which it registered in the UK for the years 2014, 2015, 2016 and from January to May 2017. The yearly average for the period works out at 6,295. In the absence of figures for the number of greyhounds exported in the JPe Report, for the purposes of this analysis, a figure of 6,300 is applied.

iii Breeding Stock Replenishment

While Table 4 shows a figure of 3,500 for Brood Bitches and 2,619 Mated Bitches, no information is provided with respect to:

- For how many years on average are Brood Bitches retained?
- How many of the 'inactive' Brood Bitches are running races and actually form part of the Dog Pool?
- How many of them are returned to racing when they have completed their role as Brood Bitches?

While there are many unknowns with respect to what the data provided actually means for the supply of greyhounds through the Racing Greyhound Dog Pool to replenish the Breeding Stock, what is clear is that the requirements are a fraction of the headline numbers for Brood Bitches/Mated Bitches, because, on average, Brood Bitches are bred from more than once. It is also clear that with a reduction in the number of pups required in response to the extension of the racing careers of greyhounds to 72 months, significantly fewer greyhounds would be required as breeding stock.

The need for a separate Breeding Pool

When Breeding Stock is replenished out to the Racing Greyhound Dog Pool during the 24-to-48-month period shown in Table 4, the Dog Pool in turn is replenished from the 4,500 pups entering the Racing Greyhound Dog Pool each year. Were it safe to do so, Brood Bitches could continue to be selected at the end of their racing careers at 72 months and a separate Breeding Dog Pool for breeding stock under 72 months would not be required. However, canine reproduction experts warn against the use of older dogs for breeding. The following is a transcript of an online seminar by Dr. Robert Van Hutchison given by the Veterinary Information Network's Pet Care Forum (<http://www.vin.com/PetCare/>).

'When a bitch ovulates, whether we breed her, don't breed her, or pretend she's not in season, the progesterone HAMMERS the uterine lining for sixty-plus days. The progesterone level is NOT affected by pregnancy... Even though the bitch's body produces the progesterone, the progesterone is inflammatory to the uterine lining, so that after a heat cycle, the bitch's uterus is never as healthy as it was before the heat cycle. So, we go from a normal uterus... and this start's with the first cycle of her life...to an endometritis to endometrial hyperplasia ...this is when the uterus starts to thicken and we start to get bubbles in the lining of the uterus – these changes affect the uterine lining so much so that eventually the uterus cannot control the bacteria, and the ultimate end stage is pyometritis [a uterine infection]. So, breeding back-to-back... or even back to back to back to back...[is the recommendation]'

That being the case a separate breeding pool is required which would draw on greyhounds retired early from the Racing Greyhound Dog Pool.

Calculation of Pups required each year to replenish Breeding Stock

The WELFARE OF GREYHOUNDS ACT 2011, Part 3, places limits on the age of brood bitches which can be used for breeding and the number of litters they may have:

11.—(1) A person who causes or permits a greyhound bitch to be mated, inseminated or otherwise used for breeding purposes unless the bitch has reached the age of 15 months commits an offence.

(2) A person who causes or permits a greyhound bitch to give birth to more than 6 litters during her lifetime or, if subsection (3) applies, 8 litters, commits an offence.

(3) A person may permit a greyhound bitch to give birth to no more than two additional litters to the 6 litters referred to in subsection (1) if, prior to a mating or insemination leading to such birth—

(a) a veterinary practitioner certifies that the pregnancy and birth do not present a risk to the health or welfare of the bitch, and

(b) the certificate is lodged with the Club.

For the purposes of this analysis the following assumptions are made:

- Pups are at least 18 months of age before they are mated/inseminated
- The average Brood Bitch will produce 4 litters
- The average period for which a Brood Bitch is retained is 42 months

Table J Brood Bitches per Year to Support Exports & Racing	
Racing Greyhound Dog Pool Replenishment	900
UK Exports	6,300
Net Pups to Support Racing per year	7,200
Interval between Litters (mths)	9
Average No. of Litters per Greyhound	4
Average Pups per Litter	6
Pup Mortality	10%
Live Pups per Litter	5.4
Live Pups per Year per Bitch	7.2
Net Racing Litters Required per year	1,000
% of Pups with Qualifying Times	0.75
Gross Litters Required per Year	1,333
Average Breeding Life Span	3.5
Net Brood Bitches x Yr to Support Exports & Racing	381

Table J shows the first step taken in calculating the number of Brood Bitches per year which would be required to provide 900 pups to replenish the Racing Greyhound Dog Pool, and 6,300 for export, giving a total of 7,200 pups.

As discussed previously, not all greyhound pups will produce a Qualifying time to allow them to race. That means that an allowance has to be made for these pups if the figure of 7,200 is to be delivered on.

For the purposes of this analysis it is assumed that 25% of pups fail to deliver a qualifying time. That means that an additional 333 Litters per year would need to be produced each year to ensure an adequate supply of pups with qualifying times. Table K shows what the replenishment flow of Brood Bitches would look like.

Table K Brood Bitches per year to Support Exports & Racing					
Age (Months)	Year				
	0	1	2	3	4
24 - 36	-	381	381	381	381
36 - 48	-	-	381	381	381
48 - 60	-	-	-	381	381
60 - 66					190
Net Brood Bitches	-	381	762	1,143	1,333

In order to ensure that 1,333 Litters are supplied each year, a buffer of Brood Bitches will be required to allow for bitches which fail to become pregnant, lose a litter, become ill/die, are retired early, or do not produce a litter for other reasons. In making the required adjustments the same adjustments as applied in Table 4 of the JPe Report are applied in the following table.

Table L Total Brood Bitches Required in Breeding Pool		
Item	JPe Report Table 4	PRL Calculation
Total Brood Bitches	3,500	1,795
Mated Bitches	2,619	1,343
Active Bitches	75%	75%
Successful Matings	99%	99%
No of Litters	2,600	1,333

Applying the adjustments as in Table 4 of the JPe Report, the Total Number of Brood Bitches required by the Breeding Pool works out to be 1,795 at any one time.

Table M Supply of Pups Required to Replenish the Breeding Pool					
Age (Months)	Year				
	0	1	2	3	4
24 - 36	-	513	513	513	513
36 - 48	-	-	513	513	513
48 - 60	-	-	-	513	513
60 - 66					256
Total Dog Pool	-	513	1,026	1,538	1,795

In order to replenish the Brood Bitches of 1,795, a supply of 513 bitches from the Racing Greyhound Dog Pool would be required.

Pups Required to be born to supply Brood Bitches	
Replenishment of Brood Bitches	513
% of Pups with Qualifying Times	0.75
Pups per year to support Breeding	684

In order to replenish the 513 bitches each year joining the Breeding Pool, some 684 Pups would need to be available for Trials, to allow for 25% of Pups not producing a Qualifying time.

Final Calculation of Surplus Pups based on Net Requirements

Table O Final Calculation of Surplus Pups	
Pups at 24 Months	14,000
Entry into Dog Pool	900
GBGB Registrations	6,300
Brood Bitches	513
Stud Dogs	200
Surplus Pups	6,087

Table O shows the final calculation for Surplus Pups uses the same figure of 14,000 'Pups at 24 Months' as shown in Table 4 of the JPe Report, and subtracts from it the figures for:

- Dog Pool Replenishment
- Exports
- Brood Bitches
- Stud Dogs

That results in a final figure for Surplus Pups of some 6,000 pups.

Due to the small numbers involved and the lack of clarity around the length of time a Stud Dog spends in a Breeding Pool, a token estimate of 200 Stud Dogs has been applied. That compares to the average figure for Stud Dog Registrations by the ICC of 319 for the three years, 2013 to 2015. In practice, Stud Dogs could be taken from greyhounds retiring from racing at 72 months, which would obviate the need for a separate allocation of pups to replenish the pool of Stud Dogs.

Conclusion on Surplus Dogs

There is no mystery regarding the existence of a surplus of Pups when it comes to Racing Greyhounds. To begin with, it is a fact that a percentage of Pups will not produce a qualifying time, and that will continue to be the case, no matter how tightly the numbers in the overall dog pool are controlled. If, on top of that, one raises the bar with respect to the entry times and proceeds to retire greyhounds from the Racing Greyhound Dog Pool at an average of 29 months, when they still have another 43 months to race, it can only be that a significant surplus is created. In turn, that surplus drives an additional requirement for breeding stock, which further fuels the surplus of pups.

In fact, the Surplus may be even greater than calculated if the *actual* number of Pups per litter were to be used as opposed to the 'rule of thumb' of 6 pups per litter applied by the Irish Coursing Club. The reason for highlighting that issue is because on Page 5 of the Breeder Handbook produced by the Greyhound Welfare & Integrity Commission of Australia, it is stated that: '*While the average greyhound litter size is 6.7 pups, litters may range in size from 1 pup to 13 pups, and there is no guarantee that a particular pregnancy will result in more pups*'. That is a difference of 10% between the Australian value and the ICC value.

Were the Australian value of 6.7 pups per litter to be applied it would give a starting figure of pups born in Table 4 of the JPe Report of 17,420 pups, as opposed to the figure presented of 15,678. Adjusting the 17,420 figure for 10% Mortality would give 15,678 pups compared to the figure of 14,000 Pups cited in the table. That would leave an additional surplus of 1,678 Pups to be explained.

Greyhound Traceability

In the Executive Summary of the JPe Report it is stated that: '*The Greyhound Racing Act (2019) was signed into law on 28th May 2019. This Act strengthened the legal basis for regulation of the integrity of the greyhound racing industry. It made provision for the introduction of a greyhound traceability system, to enable greyhounds to be traced throughout their lives. In early 2021, the Rásaíocht Con Éireann Traceability System (RCÉTS) was launched by GRI*'. What is not explained in the JPe Report is why GRI chose to implement traceability in the case of Retiring Racing Greyhounds, while excluding pups comprising the Greyhound Pipeline.

6. Analysis of Costings

Just because a pup does not produce a qualifying time, or cannot master the skill of running around bends, or is simply not fast enough, or is deemed not capable of competing for some other reason; it does not mean that its life expectancy should be shorter than its peers in the racing dog pool. On that basis, the subset of 6,000 surplus, unaccounted-for greyhounds, should also be recognised in the JPe Report for making a major contribution to the Irish economy.

Costings for Unaccounted-for Dogs from 12 to 24 Months

As established in the previous section, by the time a greyhound reaches 24 months, the vast majority (if not all of them), will have found their way into one of three categories:

- Racing in the Irish Dog Pool
- Racing in the UK
- Unaccounted-for Pups

That being the case, the costings provided for the 12-to-24-months period of the pipeline, based on 14,000 pups, includes greyhounds from all three categories, which means that the costs relating unaccounted-for dogs are included.

Stage	No. of Pups	Age (Months)		Cost Item	€m	Euro x Pup to 24 mths
		From	To			
Training	14,000	12	24	Registration & Naming with ICC	0.35	25
				Training Costs	25	1,786
				Travel	10	714
				Trial Fees	1	71
				Race Entry Fees	0.55	39
				Transfer Fees effected at ICC	0.25	18
				Veterinary Care	11	786
Total Outlay					48.15	3,439
Cost per Litter allowing for 10% Mortality						18,572

In Table P, the cost items for which actual records are available (shaded in grey), come to just €2.15m or 4.5% of the Total Outlay. All of the other costings are based on estimates. Given the inclusion of Unaccounted-for Pups in the Costings, it is understandable that accurate costings would be difficult to arrive at, however, anybody with the slightest knowledge of greyhounds will be aware that to claim that, on average, €1,786 was spent on training each one of 14,000 pups, or that on average, each pup incurred veterinary costs of €786, are simply not credible. For those who are not familiar with the greyhound industry, but who are familiar with the cost of travel, the following illustration is provided:

- In Table P above, 'Race Entry Fees', are shown to be €39 per greyhound, which, at €10 for SIS Races and €15 for non-SIS Races, corresponds to fewer than 4 races per pup. Using a value of 4 races per pup, and assuming that no more than one pup is brought to a track by its owner for a given race meeting, the average round trip cost of taking a pup to a race is: $714 \div 4 = €178$. Were a figure of greater than one greyhound per journey to be applied, the total number of journeys would be reduced and the average cost of a round trip to the greyhound track would be increased beyond €178. Even to someone who knows nothing about greyhounds, such numbers are not credible.

In practice, dogs which fall into the unaccounted-for category are not being Trained, are highly unlikely to incur Travel costs, and will not be incurring veterinary costs of €786. By including them in the costings as if they were part of the Racing Greyhound Dog Pool, the costings provided are inflated.

Further distorting the figures in the 12 to 24-months category, is the fact that many greyhounds which are exported to the UK will be exported before they reach 24 months, and thereafter incur no costs in Ireland. Once again, the costings are inflated.

Costings for Unaccounted-for Dogs, 24 Months to end of Life

While Unaccounted-for dogs are included in the 12-to-24-month section of the pipeline, there are no costings provided in the *JPe* Report for unaccounted-for dogs, from 24 months to their end of life. That can only mean one of two things:

- The *JPe* Report understates the contribution of the greyhound industry to the Irish economy
- The Unaccounted-for dogs no longer incurring costs
 - They no longer exist
 - They have been exported

Potential Understatement of the Contribution of the Greyhound Industry

The *JPe* report bases the value of the pipeline of racing greyhounds to the economy on the expenditure triggered by the greyhounds which make the industry possible in its current format. In order to be consistent in valuing the contribution of the industry, a value should be placed on those greyhounds which cannot be accounted-for due to a lack of traceability, but which are known to be an inherent part of the pipeline, as they were once registered as pups, and are accounted for in the costings up to 24 months of age. There would appear to be no justification for not continuing to assign costs to them from their twenty fifth month, to end of life.

In order to calculate that value of unaccounted-for dogs, one needs to determine two figures:

- An estimate of the average life expectancy of a greyhound
- An estimate of the cost of maintaining an unaccounted-for greyhound

As it is clearly difficult to estimate what expenses might be incurred by unaccounted-for dogs, a conservative estimate of €50 per week has been used to arrive at an indicative value of what unaccounted-for dogs could be worth to the economy. That €50 per week includes a mix of Feed, Veterinary, Rehoming, and 'other' costs.

Table Q below shows that a surplus of 6,000 greyhounds each year builds to a total population of surplus greyhounds needing to be cared for, when an average lifespan of 9 years is applied. The cost of doing so based on €50 per week, works out at more than €100,000,000.

Table Q							
Estimated Value of Unaccounted-for Dogs to the Economy							
Item	Age of Dogs in Years						
	3	4	5	6	7	8	9
Year 1	6,000	6,000	6,000	6,000	6,000	6,000	6,000
Year 2		6,000	6,000	6,000	6,000	6,000	6,000
Year 3			6,000	6,000	6,000	6,000	6,000
Year 4				6,000	6,000	6,000	6,000
Year 5					6,000	6,000	6,000
Year 6						6,000	6,000
Year 7							6,000
Unaccounted-for Dog Population							42,000
Annual Cost per Dog @ €50 per week							2,600
Total Annual cost of Unaccounted-for Dogs							109,200,000

With a potential contribution in the region of €100m per year being made to the Irish economy by Unaccounted-for dogs, it is difficult to conclude that their exclusion from the *JPe* Report was an oversight.

The Unaccounted-for dogs do longer exist

If the *JPe* Report is correct in not assigning any costings to Unaccounted-for greyhounds from 24 Months to end-of-life, then those greyhounds are either dead, or they have been exported to some other economy where they continue to drive economic activity. Without a system of traceability in place, one can never be certain of the answer. However, the author is not aware of any evidence which would suggest that they could have been exported.

7. Combined Impact of Distorted Volumes & Costings

The combined impact of distorted volumes and costings in the previous sections, resulting from an apparent attempt to maximise the number of greyhounds which can be justify in the racing greyhound pipeline, is the production of a set of costings which are clearly lacking in credibility. It would appear that the magnitude of the distortion made it necessary to exclude exports from the evaluation of the contribution made by the greyhound industry to the economy.

Exclusion of Exports

Despite noting on page 16 of the JPe Report that *'Ireland has a very strong reputation for greyhound breeding and as a consequence, there is a considerable export industry'*, no data is provided for exports. Given that some 6,250 greyhounds from Ireland are registered with GBGB each year, it is rather remarkable that the value of these exports are not recognised as a further contribution by the Greyhound Industry to the Irish Economy. The most likely reason for not presenting data is that when it comes to exports, the numbers appear to make very little sense.

Item		Sales Value (€)					
		1,000	2,000	3,000	4,000	5,000	5,846
Number of dogs exported	#	6,250	6,250	6,250	6,250	6,250	6,250
Total Sales Value	€	6,250,000	12,500,000	18,750,000	25,000,000	31,250,000	36,537,500
Cost of dog to 24 months	€	5,846	5,846	5,846	5,846	5,846	5,846
Cost of Dogs Exported	€	36,535,714	36,535,714	36,535,714	36,535,714	36,535,714	36,535,714
Margin	-	30,285,714	-24,035,714	-17,785,714	-11,535,714	-5,285,714	1,786
Total Government funding to GRI	€	16,800,000	16,800,000	16,800,000	16,800,000	16,800,000	16,800,000
Shortfall	€ -	13,485,714	-7,235,714	-985,714	5,264,286	11,514,286	16,801,786
Funding consumed by Exports		100%	100%	100%	69%	31%	0%

In 2019 and 2020, the Department of Agriculture, Fund and the Marine paid €16.8 million to the greyhound industry through the Horse and Greyhound Racing Fund, and it increased the allocation to €19.2 million in 2021 to provide general support to the industry and to enable it deal with COVID-19.

What the figures in the table show is that until an average sales price in excess of €3,000 per greyhound is reached, the entire allocation of government funding is consumed by the losses incurred in the below-cost selling of greyhounds to the UK.

Table R shows levels of government funding consumed by loss-making exports for a range of greyhound sales values. The average sales value would have to be €5,846 per greyhound to reach a point where government funding was no longer being used to subsidize exports. That is without taking into account the cost of those pups which fail to make the grade and join the pool of surplus greyhounds.

An analysis of the data for the Cork Sales of Greyhounds on 17 July 2021 (month the JPe report was published) shows that the average fetched by the 39 greyhounds sold on that day averaged €1,078. That compares to the estimated value of €900 contained on page 32 of the PRL Report.

8. GRI's Breeding Centric Model

Despite the statement in the Executive Summary of the IGB Strategic Plan 2018 – 2022, that: *'The Plan has a key focus on the organization being a racing-centric organization with integrity and welfare considerations at its core'*, the numbers contained in the JPe Report, particularly the assertion that the racing career of Greyhounds typically end at 48 months, confirm that the change away from the Breeding Centric Model never happened. That is not surprising, given that in the same strategic plan, the Board of IGB also reaffirmed its commitment to its Breeding Centric Model. That commitment is contained in Pillar 1, on Page 24 of the IGB Strategic Plan, which is titled:

"Incentivise greyhound ownership, breeding and training to ensure a continuous supply of high quality Greyhounds".

Also on page 24, under the heading of 'Export potential' it is stated that:

'Part of the success and popularity of Irish Greyhound racing is based on the quality of the bloodstock - the dogs being produced are world-class. As an example, the British Afternoon Greyhound Service (BAGS) has benefitted from the export of Irish greyhounds at relatively low cost. IGB will enter into discussions with the Greyhound Breeders to maximise such export opportunities at economic cost'.

Further down the same page under the heading of 'Greyhound Grading' it is stated that:

'It is mostly greyhounds in the A5/A6 categories that are currently exported'.

BAGS racing does not require 'world-class' dogs. It happily absorbs the A5/A6 dogs exported from Ireland which are far from being 'world class'.

Exports Supply Chain Management

Through its Breeding Centric Model, GRI incentivises the production of a continuous supply of surplus greyhounds for the Racing Greyhound Dog Pool in Ireland from which lower performing greyhounds suitable for the GBGB Racing Centric Model, are siphoned off, usually after proving their ability in Ireland at some point between 18 and 48 months.

Prizemoney GRI	€m	7.89
Prizemoney Sponsors	€m	1.69
Total Prizemoney	€m	9.58
Race Meetings 2019	#	1,606
No of Races	#	16,691
Races per Meeting	#	10.39
Prizemoney per Individual Race	€	574
Dog Pool Pipeline Costs	€m	117.79
Individual Races Required to breakeven on Pipeline Costs	#	205,223
No. of years required to recover costs @ 2019 level of races	#	12.30
% of costs recovered in 2-year Racing Career	%	16%

Greyhounds are exported because there are not enough races on Race Cards to cater for lower grade dogs, and the prize money is insufficient to justify their retention. It is better to take a cheque and try again.

GRI as a Critical Supplier to GBGB

An article by the Sunday Express Deputy Political Editor, Mr. David Williamson published Online on Saturday March 26, 2022 in advance of a debate on the Greyhound Industry in the British Parliament includes the following statement:

'The board [GBGB] says the British greyhound industry has an estimated turnover of £2.6 billion and employs more than 7,000 people across the country'.

On page 20 of the JPe report it is stated that:

'It is estimated that 85 per cent of the greyhounds that race in the UK are bred in Ireland and hence the export market to the UK has provided a significant outlet for the greyhound breeder'.

Those two statements make it very clear that the Irish Greyhound Industry is a critical supplier to the British Greyhound. It would be most unusual for such a critical relationship to be left to chance alone.

Winners & Losers

Based on the numbers provided in the JPe Report, it would appear that the true winner in relation to the Irish Racing Greyhound Industry, is the British Racing Greyhound Industry. It receives a continuous supply of below cost greyhounds subsidised by the Irish Tax Payer and Greyhound Owners, while at the same time wiping its hands of all responsibility for caring for the unavoidable cohort of pups which fail to make the grade.