

Review of Governance of Horse and Greyhound Racing Fund

Final Report

Submitted to

**Department of Agriculture, Food and
the Marine**

Prepared by

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Executive Summary

Introduction and Background

This report is submitted to the Department of Agriculture, Food (DAFM) and the Marine by Indecon International Economic and Strategic Consultants (Indecon). The report concerns an independent review of the governance of the Horse and Greyhound Racing Fund.

The background to this review is that the Horse and Greyhound Racing Division, within DAFM, has governance oversight responsibility for the Horse and Greyhound Fund, and for the two commercial state bodies, Horse Racing Ireland (HRI) and Rásaíocht Con Éireann (RCÉ). DAFM provides financial support to the industries through the Horse and Greyhound Racing Fund, as legislated for under Section 12 of the Horse and Greyhound Racing Act, 2001. The only two direct recipients of support under the Fund are HRI and RCÉ. The Fund is distributed in accordance with Section 12(6) of the Act, with 80% going to HRI and 20% to RCÉ. In turn, HRI is responsible for the governance of the Irish Horse Racing Regulatory Board (IHRB), which is the regulatory body for all thoroughbred horse racing in Ireland. The IHRB receives circa 80-90% of its funding via HRI.

Since it was established in 2001, a total of some €1.73 billion has been paid from the Fund up to 2024. The total allocation to the Fund for 2025 is €99.1 million, of which €79.3 million will go to HRI and €19.8 million to RCÉ.

The socio-economic importance of the horse and greyhound industries has been acknowledged by successive Governments. They are supported through both legislation and policy initiatives, including the provision of financial support from the State via the Horse and Greyhound Racing Fund. The Fund is seen as essential to the survival and continued development of both industries.

Objectives and Terms of Reference for Review

This report provides an independent, external review of its governance of the Horse and Greyhound Racing Fund. The objective of the review is to support DAFM in adopting evidenced-based decision-making to inform and guide future decisions regarding the governance, including financial management, of the Fund. The review addresses the terms of reference set out in Section 1.

Overall Conclusions

Governance of Fund and of Bodies in Receipt of Funding

Indecon's conclusions in relation to DAFM's overall governance and financial management of the Fund and of the bodies in receipt of funding, as well as the governance framework in place between HRI and the IHRB, are as follows:

- The Department's oversight of two bodies is robust and meets the financial management and other requirements of the Code of Practice for the Governance of State Bodies. The liaison and other engagements between the Department and the two bodies are organised around clear, focused agendas.
- There is a good ongoing performance dialogue around the use of Fund resources and other issues between the Department and two bodies.
- The financial management, reporting and governance processes are clearly set out and understood by all parties.
- There would appear to be a good relationship between DAFM and each of the bodies, characterised by good understanding of their respective roles, along with a healthy degree of tension. There is also a good balance as between the autonomy of the bodies and responding to the Department.
- An external review of certain IHRB financial transactions has resulted, *inter alia*, in a revised service level agreement between the HRI and the IHRB. The Department is satisfied with the overall response by HRI and IHRB to the review and the agreement appears robust and provides a comprehensive governance framework that recognises the regulatory independence of the IHRB. It will be important, however, that the Department continues to monitor closely the implementation of the revised SLA.

Utilisation of Fund for Prize Monies and Efficacy of Fund in Ensuring Highest Standards of Animal Welfare

Indecon's conclusions from the review in relation to whether use of the Fund to subsidise prize monies and regarding the efficacy of the Fund in relation to ensuring the highest standards of animal welfare are as follows:

- The Department has placed a strong emphasis on animal welfare issues with the importance of progressing the welfare agenda called out in the Minister's stakeholder expectations letter and the annual parameters letter to the two bodies. Welfare and integrity issues also feature as a standing item on liaison meeting agendas between the Department and the two bodies.
- Both RCÉ and HRI are cognisant of the importance of animal welfare, which is an existential issue, particularly for RCÉ in the case of the greyhound sector.
- However, while welfare is receiving greater focus by HRI, IHRB and RCÉ, more needs to be done. We note the progress made by RCÉ on a range of metrics used to monitor its care and welfare programme, but it would be preferable if targets were set and agreed with the Department in respect of these indicators.
- IHRB (through HRI) has estimated that the cost to implement the outstanding Suann report recommendations would be €1.5 million. It will also be important for the Department to monitor tightly the key performance indicators for equine safety and care set by HRI in its strategic plan and the commitment to increase its annual welfare budget by 70% by 2028.
- Prize money is important for sustaining competitiveness of horse racing sector and supporting investment, but the success of the industry suggests that there could be an element of deadweight in HGRF allocation to prize money allocation.
- The greyhound racing industry is very dependent on the HGRF to fund prize monies, with 83% of the prize money provided by RCÉ via the Fund. This compares with 61.5% of horse racing prize monies supported by the Fund.
- Overall, there is a stronger public policy rationale for funding of welfare and integrity programmes than for prize money, given the public good features of the former and the risk of under-investment in these areas by the sector.

Recommendations for Consideration

On foot of this review, Indecon has identified the following recommendations, with the objective of further enhancing the financial management and governance of the Horse and Greyhound Racing Fund.

Recommendations	
1	IHRB governance issues should be a standing item on agenda for DAFM/HRI liaison meetings.
2	The Department should continue to monitor closely implementation of the revised HRI/IHRB SLA.
3	The share of HGRF ringfenced for welfare and integrity purposes for both RCÉ and HRI should be increased over the medium term and communicated in the annual parameters letter to the bodies.
4	HRI should provide regular the reports to the Department on the equine care and welfare key performance indicators set out in its strategic plan and the Department should monitor these closely.
5	The Department should agree stretch targets with the RCÉ in respect of its care and welfare programme and review these on a regular basis.
Source: Indecon	

1 Introduction and Background

1.1 Introduction

This report is submitted to the Department of Agriculture, Food and the Marine by Indecon International Economic and Strategic Consultants. The report concerns an independent review of the governance of the Horse and Greyhound Racing Fund.

1.2 Background to Review

The overall mission of the Department of Agriculture, Food and the Marine is to serve the government and people of Ireland by leading, developing and regulating the agri-food sector, protecting public health and optimising social, economic, and environmental benefits. In pursuit of this mission, the Department has a number of strategic goals, including to promote and safeguard public, animal and plant health and animal welfare for the benefit of consumers producers and wider society, and to provide income and market supports to underpin the rural economy and the environment.

The Horse and Greyhound Racing Division, within DAFM, has governance oversight responsibility for the Horse and Greyhound Fund, and for the two commercial state bodies, Horse Racing Ireland (HRI) and Rásaíocht Con Éireann (RCÉ). The governance framework applied by the Department is designed to ensure compliance with the Code of Practice for the Governance of State Bodies ('the Governance Code')¹ and the governing legislation for each of the bodies, as well as associated circulars and other relevant legislation. The framework is implemented through the Department's 'Horse and Greyhound Racing Procedures Manual' (see further under Section 1.4 below).

Horse and Greyhound Racing Fund

DAFM provides financial support to horse racing and greyhound racing industries through the Horse and Greyhound Racing Fund (the Fund or HGRF), as legislated for under Section 12 of the Horse and Greyhound Racing Act, 2001 (the Act). The only two direct recipients of support under the Fund are HRI and RCÉ. The Fund is distributed in accordance with Section 12(6) of the Act, with 80% going to HRI and 20% to RCÉ. In turn, HRI is responsible for the governance of the Irish Horse Racing Regulatory Board (IHRB), which is the regulatory body for all thoroughbred horse racing in Ireland. The IHRB receives circa 80-90% of its funding via HRI. The recent pattern of annual allocations from the Fund is shown in Table 1.1. The total allocation to the Fund for 2025 is €99.1 million with €79.3 million to HRI and €19.8 million to RCÉ. Overall, since it was established in 2001, a total of some €1.73 billion has been paid from the Fund up to 2024. The cumulative upper limit on payments from the fund, provided for under the relevant regulations, is reached each year and a new statutory instrument is required.

The socio-economic importance of the horse and greyhound industries has been acknowledged by successive Governments. They are supported through both legislation and policy initiatives, including the provision of financial support from the State via the Horse and Greyhound Racing Fund. The Fund is seen as essential to the survival and continued development of both industries.

¹ Code of Practice for the Governance of State Bodies. See: www.gov.ie/pdf/?file=https://assets.gov.ie/138835/1d213280-29b8-41ec-92c4-ca8974db5224.pdf#page=null

Table 1.1: Recent Developments in Horse and Greyhound Racing Fund Allocation – 2019-2025

Year	HRI (€m)	% of Total	RCÉ (€m)	% of Total	Total (€m)
2025	79.3	80.0%	19.8	20.0%	99.1
2024	76.0	80.0%	19.0	20.0%	95.0
2023	72.8	80.0%	18.2	20.0%	91.0
2022	70.4	80.0%	17.6	20.0%	88.0
2021	76.8	80.0%	19.2	20.0%	96.0
2020	67.2	80.0%	16.8	20.0%	84.0
2019	67.2	80.0%	16.8	20.0%	84.0

Source: DAFM

1.3 Objectives and Terms of Reference for Review

The context for this review of the governance of the HGRF is that the Committee of Public Accounts (PAC), in its January 2023 report on the ‘Examination of the 2019 and 2020 Financial Statements for Horse Racing Ireland, and related financial matters,’ made recommendations in relation DAFM’s governance of the Fund.² The PAC, in its report, brought particular attention to two specific items as follows:

- Whether the use of the Fund to subsidise prize funds represents best value for money; and
- The efficacy of the fund in ensuring the highest levels of animal welfare standards.

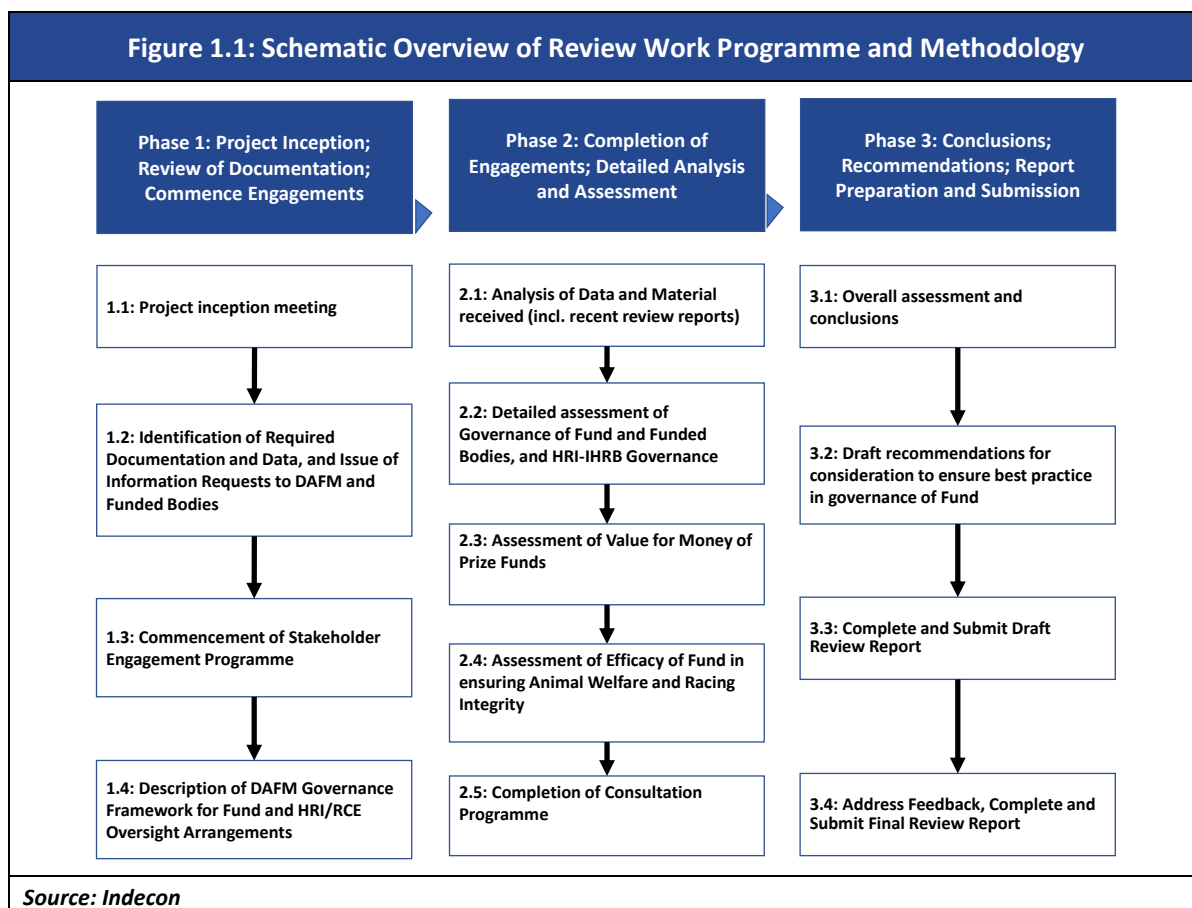
In response, DAFM committed to completing an independent, external review of its governance of the Fund. This review will support DAFM in adopting evidenced-based decision-making to inform and guide future decisions regarding the governance, including financial management, of the Fund. The review addresses the following terms of reference:

- To review of DAFM’s overall governance of the Fund, including the Department’s governance of the bodies in receipt of support from the Fund, having regard to the existing legislative and policy framework;
- To consider:
 - Whether the use of the fund to subsidise prize funds represents best value for money; and
 - The efficacy of the fund in ensuring the highest levels of animal welfare standards;
- To make recommendations for consideration to ensure best practice in financial management and governance of the Fund;
- To review the governance framework in place between HRI and the IHRB within the context of the existing legislative and policy environment and the existing SLA; and
- To take into consideration any available findings from an independent review into certain financial matters relating to the IHRB, which has recently been finalised.

² See: https://data.oireachtas.ie/ie/oireachtas/committee/dail/33/committee_of_public_accounts/reports/2023/2023-01-31_report-on-examination-of-the-2019-and-2020-financial-statements-for-horse-racing-ireland-and-related-financial-matters_en.pdf

1.4 Approach to Review

In carrying out this review, Indecon applied a three-phased work programme and associated methodology to rigorously address each element of the above terms of reference. A schematic overview of the phases and tasks implemented is presented in Figure 1.1.



Documentation and Data Informing Review

To inform the desk-based analysis and assessment, this review drew on a wide range of documentation and data provided by DAFM, and by HRI, IHRB and RCÉ via DAFM. These included in particular:

- The DAFM State Bodies (Horse and Greyhound Racing) section's, 'Horse and Greyhound Racing Procedures Manual' and associated checklists.³ Hereinafter, this is referred to as the (DAFM) Procedures Manual;
- Code of Practice for the Governance of State Bodies (2016 and subsequent updates);
- Annual Report for HRI (latest available/published for 2023);
- Annual Report for RCÉ (latest available/published for 2023);
- Annual Report of IHRB (latest available/published for 2023);

³ 'Horse and Greyhound Racing Procedures Manual.' Department of Agriculture, Food and the Marine, State Bodies section.

- HRI Strategic Plan 2024-2028;
- HRI-Irish Thoroughbred Welfare Council, 'Our Industry, Our Standards: Principles of Animal Welfare in Ireland's Horse Racing Industry';
- IHRB cost projections for implementation of recommendations of Suann Report;
- IHRB Risk Report January 2025;
- HRI report on 'Social and economic impact of Irish thoroughbred Breeding & Racing 2023';
- RCÉ report on the Economic & Financial Significance of the Irish Greyhound Industry (2021);
- IGB/RCÉ Strategic Plan 2028-2022;
- Committee of Public Accounts. Examination of the 2019 and 2020 Financial Statements for Horse Racing Ireland, and related financial matters (January 2023), in addition to Department of Public Expenditure Response to this report; and
- Transcript of Seanad Éireann debate, 29 November 2023, on Horse and Greyhound Racing Fund Regulations 2023 Motion (Houses of the Oireachtas, Volume 297, No. 8).

Consultation programme

In addition to the receipt and review of detailed documentation and data, this review was also informed by a series of detailed interviews with DAFM officials and senior management within the HRI, RCÉ and the IHRB, as follows:

- Review inception meeting with DAFM officials (4 December 2024);
- Meeting with DAFM officials (AP and HEOs) (15 January 2025);
- 2nd Meeting with DAFM officials (ASec and Principal) (11 Feb 2025);
- Meeting with RCÉ senior management (25 February 2025);
- Meeting with HRI senior management (27 February 2025); and
- Meeting with IHRB senior management (24 March 2025).

1.5 Structure of Report

The remainder of this report is structured as follows:

- Section 2 addresses the terms of reference in relation to DAFM's governance of the Horse and Greyhound Racing Fund in respect of Horse Racing Ireland's receipt of support under the Fund;
- Section 3 examines the governance of the Fund from the perspective of oversight of RCÉ's receipt of support under the Fund; and
- Section 4 integrates the detailed analysis and assessment undertaken in the preceding sections, to develop our overall conclusions. The section also presents Indecon's recommendations on foot of the review.

1.6 Acknowledgements and Disclaimer

Indecon would like to acknowledge the inputs and support provided by a range of individuals and organisations during the completion of this review. We would particularly like to thank senior officials within the State Bodies (Horse and Greyhound Racing) section of the Department of Agriculture, Food and the Marine, including Gordon Conroy (Assistant Secretary), Kevin Galligan (Principal), Annamarie McNally (Assistant Principal), Margaret Tully (HEO) and Deirdre McLoughlin (HEO). We would also like to express our gratitude to senior management within the bodies funded directly or indirectly by the HGRF, including: Suzanne Eade (CEO, HRI), Connie Costello (CFO, HRI) and Claire Rudd (Head of Risk & Compliance); Tim Lucey (CEO, RCÉ), Pet Herbert (Director of Regulation, RCÉ), John Tuohey (CFO, RCÉ), Derek Frehill (Director of Racing, RCÉ), Darragh O'Loughlin (CEO, IHRB) and John Murphy (CFO, IHRB).

The usual disclaimer applies and the analysis in this report remains the sole responsibility of Indecon.

2 Review of Governance of HRI Utilisation of Fund

2.1 Introduction

This section addresses the terms of reference in relation to DAFM's governance of the Horse and Greyhound Racing Fund in respect of Horse Racing Ireland's receipt of support under the Fund.

2.2 HRI Role and Funding

Horse Racing Ireland (HRI) is the commercial state body "responsible for the overall administration, governance, development, and promotion of the Irish horseracing industry on an all-island basis."⁴ HRI was established by the Horse and Greyhound Racing Act of 2001 to 2016.⁵ Horse Racing Ireland's mission is to develop and promote Ireland's horse racing and breeding industries, to administer and govern the sport of horse racing in Ireland, to cultivate and promote the highest standards of integrity and welfare

HRI is central to the regulation and development of the horse racing industry, with its key responsibilities including:

- Supplementing prize monies within the horse racing industry;
- Negotiating income from media rights;
- Representing Irish horse racing internationally;
- Financing capital development within the horse racing industry;
- Advertising and marketing on the national and international level; and
- Monitoring and ensuring the wellbeing of racehorses in Ireland.

In addition to its allocation from the Horse and Greyhound Racing Fund (which accounted for 62% of HRI income in 2023), HRI funds its operations through racecourse income, media income and prize money contributions by owners and sponsors, in addition to smaller sources including a foal levy and registration fees.

In terms of the rationale for provision of HGRF support to the industry, a 2023 report into the Social and Economic Impact of Irish Thoroughbred Breeding and Racing, commissioned by HRI, indicated that the total direct and stimulated expenditure of the Irish breeding and racing industry is estimated at €2.46 billion in 2022. In addition, it is estimated that the industry supports the direct and indirect employment of 30,000 people. The thoroughbred industry also brings a high level of international investment into Ireland. The Irish equine breeding and racing industry is extremely competitive at a global level, despite other major racing nations having much larger populations and economies. Ireland is the second largest producer of bloodstock in the world by value sold, after the USA. Ireland also has the world's third highest number of thoroughbreds foaled each year after the USA and Australia. The importance of a strong welfare and integrity foundation to this industry is crucial and this is recognised throughout the breeding and racing industry.

⁴ About Us – Horse Racing Ireland. See: www.hri.ie/corporate/about-us.

⁵ Horse and Greyhound Racing Act, 2001. See: www.irishstatutebook.ie/eli/2001/act/20/section/8/enacted/en/html#sec8.

2.3 DAFM Governance Framework and Arrangements for Oversight of HRI

Horse and Greyhound Racing Procedures Manual

The overarching governance framework for the horse and greyhound racing sector is set out in the Department's 'Horse and Greyhound Racing Procedures Manual.' Indecon would highlight the following aspects from Section 1 of the manual:

"State Bodies Section has oversight responsibilities for two commercial State Bodies, Horse Racing Ireland (HRI) and Rásaíocht Con Éireann (RCÉ). The Section also interacts with the Irish Horse Racing Regulatory Board (IHRB) and the Irish Coursing Club (ICC). The main business of the Section is Corporate Governance and disbursement of the Horse and Greyhound Racing Fund. DAFM has 12 State bodies under its aegis. The Section is led by two APs and consists of two HEOs, two EOs and a CO. In general, one HEO is responsible for matters relating to the thoroughbred sector and one is responsible for matters relating to the greyhound sector. Each HEO is assigned an EO, and the CO provides support to the whole team.

The overarching framework for the Section is provided by the relevant governing legislation listed below, the Code of Practice for the Governance of State Bodies (2016) and periodic circulars as issued from time to time e.g., by DPENDR.

The main areas of responsibility are:

- Monitoring the corporate governance of two commercial State Bodies;
- Disbursing the Horse and Greyhound Racing Fund;
- Managing the annual administrative process in relation to the Fund;
- Laying the accounts of HRI, RCÉ (and their subsidiaries) and the IHRB, before the Houses or the Oireachtas;
- Providing support to the bodies listed above regarding legislative queries and queries relating to circulars;
- Providing support to senior management and Ministerial team regarding the governance of thoroughbred and gracing racing industries; and
- Liaison with the Agriculture Vote section in DPENDR regarding relevant matters relating to the governance of thoroughbred and gracing racing industries."

Arrangements for Oversight of HRI

The Department operates a range of procedures and processes to ensure that HRI complies with its governing legislation, the Governance Code, as well as associated circulars and any other relevant legislation. This governance framework for HRI comprises formal oversight documentation, full consideration of financial statements, maintenance of communication at all levels and Ministerial appointments to the Board. Some of the key governance documents (additional to the procedures manual referred to above) and processes include the following:

- Shareholder Letter of Expectation issued at various intervals by the Minister to HRI;
- Formal annual letter issued by the Department setting out parameters and conditions relating to the HRI annual allocation under the Fund ('Parameters Letter');
- The provision of a corporate governance report by the HRI Chair to the Minister on an annual basis;
- Annual checklist used to assess the body's compliance with relevant provisions of the Code of Practice for the Governance of State Bodies;

- Formal meetings, including biannual liaison meetings between officials in the Department’s Horse and Greyhound Racing Division and HRI officials, as well as an annual meeting between the HRI Chair and Chief Executive with the DAFM Secretary General;
- Regular ongoing contact between DAFM officials and HRI executives;
- The requirement of reports on certain matters, including periodic updates to HRI welfare initiatives;
- Clearly defined processes for the consideration of Fund drawdown requests; and
- Clearly defined processes for the consideration of annual reports and audited financial statements, culminating in the laying of these documents in the Oireachtas library.

Indecon has examined the key governance documents and processes based on the documentation provided by the Department and informed by consultations with DAFM officials. Our assessment is set out below.

Shareholder Expectation Letter

The most recent shareholder expectation letter (SEL) - from the Minister to the HRI Chair - was issued on 4th March 2025. The purpose of the letter is to provide guidance to the HRI Board with respect to the Government’s current objectives for HRI over the short and medium terms. These objectives relate to governance arrangements (including roles and responsibilities of the Board, Chairperson, and CEO of HRI), dividends policy, return on capital, animal welfare, sectoral policy objectives, and adherence to several specific circulars and guidance issued by the Department of Public Expenditure NDP Delivery and Reform, among others.

The SEL is detailed and comprehensive in nature. The letter noted the importance of a strong welfare and integrity foundation to the horse racing/thoroughbred industry and the Minister’s expectation that the HRI “continues to focus and develop this area, which includes working with the IHRB and other relevant stakeholders to ensure the highest standards of integrity and welfare are maintained.”

The appendices to the SEL provide specific additional guidance on a range of topics, as follows:

- Appendix 1: Financial Performance Measures;
- Appendix 2: Role of the Board;
- Appendix 3: Roles of the Chairperson;
- Appendix 4: Roles and Responsibilities of the Chief Executive Officer of a State Body under the aegis of the Department of Agriculture, Food and the Marine; and
- Appendix 5: Roles and Responsibilities of Accounting Officer.

DAFM Parameters Letter

The most recent annual parameters letter from the Department to the CEO of HRI was issued on 4 February 2025. The letter confirmed the 2025 allocation from HGRF to HRI (€79,282,000). This allocation from the Fund is “for the purpose of providing support to the horse and greyhound racing industries,” and to assist HRI “in discharging its statutory functions.” The letter confirmed the distribution of the allocation between capital and current expenditure. It also stipulates that a minimum of 20% of funding is to be spent on integrity services, and not more than 80% on prize monies. The Department’s communication highlights the importance of thoroughbred welfare, as

well as the need for HRI to continue its work in this area, of which the Department should be kept apprised. Specifically, DAFM requires that HRI continue to work with the Department and other stakeholders in relation to whole-of-life traceability and to support organisations involved in the rehoming and retraining of horses.

The parameters letter also sets out several conditions relating to the provision of funding. These include requirements that HRI must meet regarding compliance with legal obligations, submission requirements, annual progress reports, and maintenance of an up-to-date SLA with the IHRB. The letter lays out various additional requirements on HRI, relating to the Curragh Racecourse, financial reporting requirements, and certificates of assurance.

In terms of financial management, the letter sets out an extensive list of financial documentation that HRI must provide to the Department including documentation in support of requests for drawdowns from the Fund, quarterly balance sheet and cash flow statements, and annual progress reports on the HRI Strategic Plan as part of the final drawdown request for 2025.

HRI Chair's Corporate Governance Report to Minister

The most recent version of this annual reporting requirement (October 2024) took the form of a three-page letter from the HRI Chair to the Minister. The report is comprehensive in nature covering financial performance, codes of conduct, compliance with corporate governance requirements, compliance with tax laws, compliance with Public Spending Code requirements, and procurement.

DAFM Governance Code Checklist

The Department also uses a checklist to assess the body's compliance with relevant provisions of the Code of Practice for the Governance of State Bodies. The checklist takes the form of a listing of all the compliance requirements of the Code in the form of questions, followed by an indication of whether each requirement has been complied with or not (or whether it does not apply), explanatory text and the initials of the official checking the requirement and the date of verification. Indecon has reviewed the most recent iteration of this checklist in respect of HRI, which was signed off at assistant principal level in the Horse and Greyhound Racing Division in November 2024. The checklist runs to some twenty-three pages and is organised around some ten headings taken from the Code broken down into more detailed sub-headings in some cases. The checklist is completed by the Division following receipt and examination of HRI's audited financial statements and associated documents. The structure of this checklist is set out in the table presented in Annex 1.

Indecon's examination of the checklist and documentation supplied by DAFM indicates that HRI has been substantively in compliance with the requirements of the Governance Code, except in five instances, where HRI has provided explanations for why this is not the case. These are as follows:

- Under the business and financial reporting heading, in two instances the checklist indicates that the HRI's interim unaudited financial statements (for 2023 and H1 2024) were not submitted by the end of the second and eighth month of the financial year respectively. This is explained by HRI's request of an extension to the deadlines, and the subsequent submission of the statements to DAFM on 28 March and 4 October 2024, respectively, with copies subsequently forwarded to DPENDR.
- Again, under the business and financial reporting heading, the checklist indicates that the HRI's annual report and financial statements (commercial) for 2023 were not published by the end of the fourth month of the subsequent financial year. This is explained by HRI's publication of these documents being delayed by its auditing by the C&AG. HRI requested an extension to this deadline (which was granted by DAFM).

- Under the relations with the Oireachtas, Minister and parent department heading, the checklist indicates that the HRI's shareholder expectations letter is not reviewed annually. It is explained that going forward it is the division's intention to review it annually. A revised letter was recently issued, as discussed above.
- Under the remuneration and superannuation heading, the checklist indicates that the HRI has not implemented Government policy in relation to the total remuneration package, etc. of the CEOs/Managing Directors of State bodies. It is explained that the current CEO was appointed in November 2021, with a remuneration package that exceeds DPER guidelines but that this salary was proposed by HRI and consented to by DAFM and DPER.

CEO confirmation of compliance

This confirmation takes the form of a letter signed by the CEO and CFO of HRI to the Department in line with the conditions of HGRF support set out in the DAFM parameters letter (discussed above). The most recent iteration reviewed by Indecon was dated January 2024 and provides various financial assurances for 2023 based on draft management accounts for that year.

DAFM/HRI liaison meetings and other engagements

Officials from the Horse and Greyhound Racing Division in the Department meet formally twice a year with the HRI executive team in liaison meetings. These meetings are organised based on an agreed agenda, and we reviewed the agenda and meeting note for the two engagements held in 2024. Based on our desk-based review, the agendas and discussion appear to have been comprehensive and covered a range of standing issues including corporate governance, legal issues, financial performance, horse welfare, and Fund management. Looking at the November 2024 meeting, we note that some 13 separate agenda items were discussed, exclusive of the report of the previous meeting and any other business.

Under the corporate governance items, the minutes of both meetings indicate that HRI was asked to confirm its compliance with the Code of Governance. At the November meeting, under the welfare and integrity items, there was specific discussion of four separate sub-items - an update on end-of-life initiatives, discussion that end of life of racehorses is the responsibility of horse owners, progress on the rehoming and retraining of thoroughbreds by Treo Eile, and the implementation of recommendations in the Suann report on the IHRB's anti-doping programme (examined below in section 2.5). As regards the latter, we note that HRI indicated that while the IHRB has implemented most of the Suann report recommendations, the implementation of the remaining recommendations will not be possible due to the financial resources available to HRI.

Based on the note of the November 2024 meeting, there was an extensive discussion of a range of issues under the "financial" item. This included three issues concerning the finances of the IHRB which we consider later in section 2.6.

In our discussions with officials in the Horse and Greyhound Division, we probed the value and utility of the liaison meetings. The Department is satisfied with the bi-annual meetings and finds them to be very useful and effective in maintaining the ongoing connection between the Division and HRI. We also understand from our discussions that there is substantial regular and more informal liaison between officials in the Division and HRI. While officials are broadly satisfied with their interactions with HRI, it was noted that HRI could perhaps be a little faster in responding to information requests from the Department on occasion.

In addition to the biannual liaison meetings, there is a weekly call between the Department and HRI at assistant secretary/CEO level. The HRI Chair and CEO also meet once a year with the Secretary General of the Department and HRI meet the Minister annually to discuss their estimates/budget request for the following year.

In our discussions with HRI senior executives, HRI were of the view that the liaison meetings serve as a good checking-in and formal catchup process and that DAFM are responsive to issues raised by it. This responsiveness is important to HRI as it operates in a competitive environment. HRI find that the annual meetings with the Secretary General are very effective from a strategic perspective with a focused agenda where only key issues are discussed.

2.4 Fund Utilisation to Subsidise Prize Monies

Funding and Role of Prize Monies

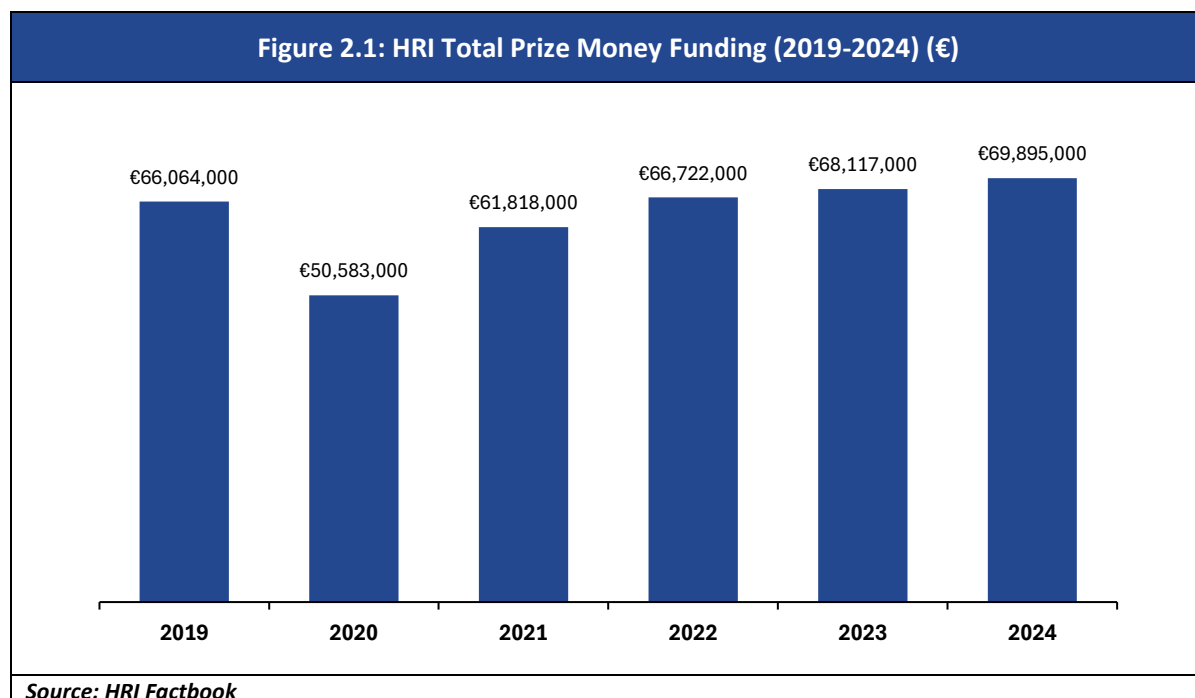
As noted earlier, HRI can only allocate a maximum of 80% of its HGRF current allocation to prize monies. Based on the data available at the time of preparation of this report, in 2023, HRI received €72.8m from the HGRF, of which €58.2m was to be allocated to current expenditure. Of this €58.2m, HRI allocated €42.7m (73%) to prize monies and €15.5m (26.6%) to welfare, as shown in Table 2.1 below.

Table 2.1: HRI Allocation of HGRF Funding (2023)		
Allocation	2023 - €	2023 - %
Prize Monies	42,700,000	73.4%
Welfare	15,500,000	26.6%
Total	58,200,000	100%
<i>Source: HRI Conditions of Compliance with Grant, 2023</i>		

The funding of prize monies by HRI is laid out in Table 2.2 below. The total prize money fund for horse racing in 2024 was €69,895,000. Of this, 24.7% (€17,259,000) was provided by owners, 9.7% (€6,779,000) came from commercial sponsors, 0.6% (€399,000) came from Northern Irish funding, 4.2% (€2,937,000) came from EBF, and 60.8% (€42,521,000) came from HRI (via the HGRF and other income).

Table 2.2: HRI Prize Money Funding (2024)		
Funding Source	2024 - Gross	2024 - %
Owners	17,259,000	24.7%
Commercial	6,779,000	9.7%
NI Funding	399,000	0.6%
EBF	2,937,000	4.2%
HRI	42,521,000	60.8%
Total	69,895,000	100%
<i>Source: HRI Factbook, 2024</i>		

Figure 2.1 shows how total prize money funding has evolved over the 2019-2024 period. After a significant dip in 2019 and 2020, the latter largely resulting from the impacts of the Covid-19 pandemic, prize money totals recovered in 2022, with 2023 and 2024 prize monies surpassing 2019 totals.



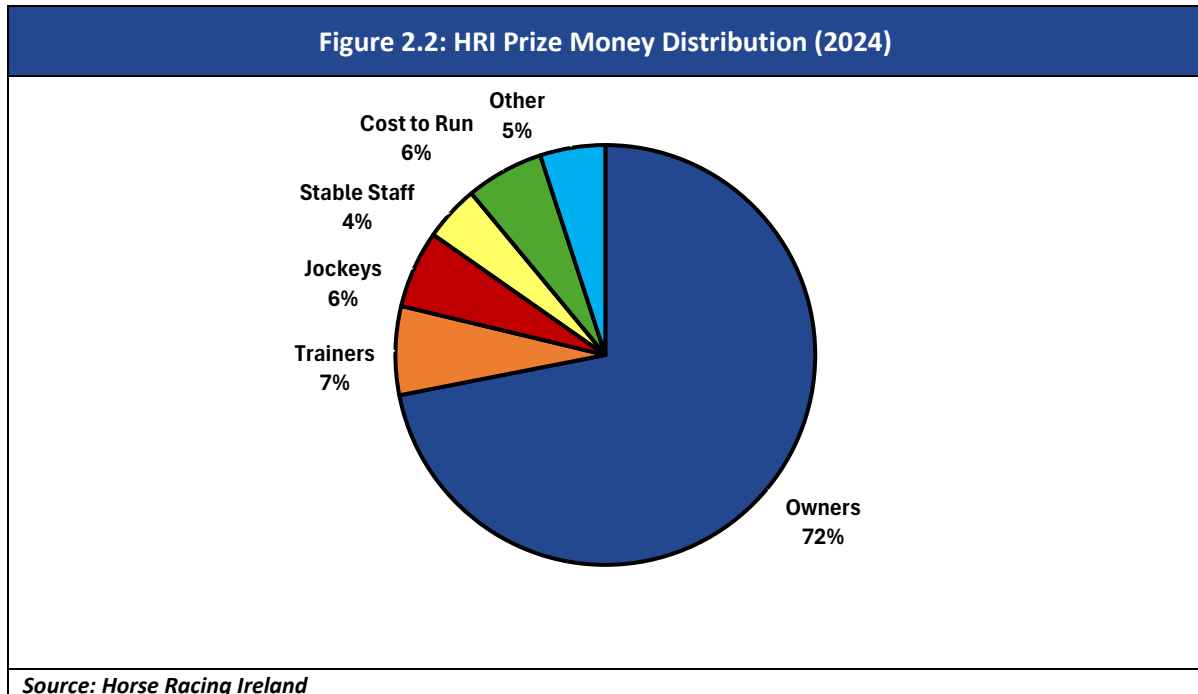
Various arguments have been advanced by the HRI and other industry stakeholders as to the importance of prize monies, and its subsidisation by the Fund, to the sector. These include:

- Prize money and HGRF support is important to the competitiveness of the racing industry which competes for foreign direct investment with the sector in other jurisdictions including Britain, France, Australia, the US, and Hong Kong, which enjoy direct or indirect (generally through state owned tote monopoly revenues) government support. Foreign direct investment (whereby foreign based owners locate their bloodstock investment in Ireland) “ultimately fuels horses in training, and therefore employment;”⁶
- Business viability in the sector is supported through a structure that includes the extension of prize money to sixth place and thus a wide distribution of prize money. For example, in 2023 72% of all owners and 87% of trainers won some prize money;
- Prize monies, and the associated racing programme, are seen as creating a platform for breeders to race their progeny in Ireland. Where successful, breeders can recoup their investment through an increase in the value of their stock and realise this through the sales rings. Through these channels, prize money is seen as an important trade stimulus to owners and breeders. In turn, the prize money stimulus is linked to the overall socio-economic impact of the sector, as demonstrated in the 2023 research conducted for HRI.

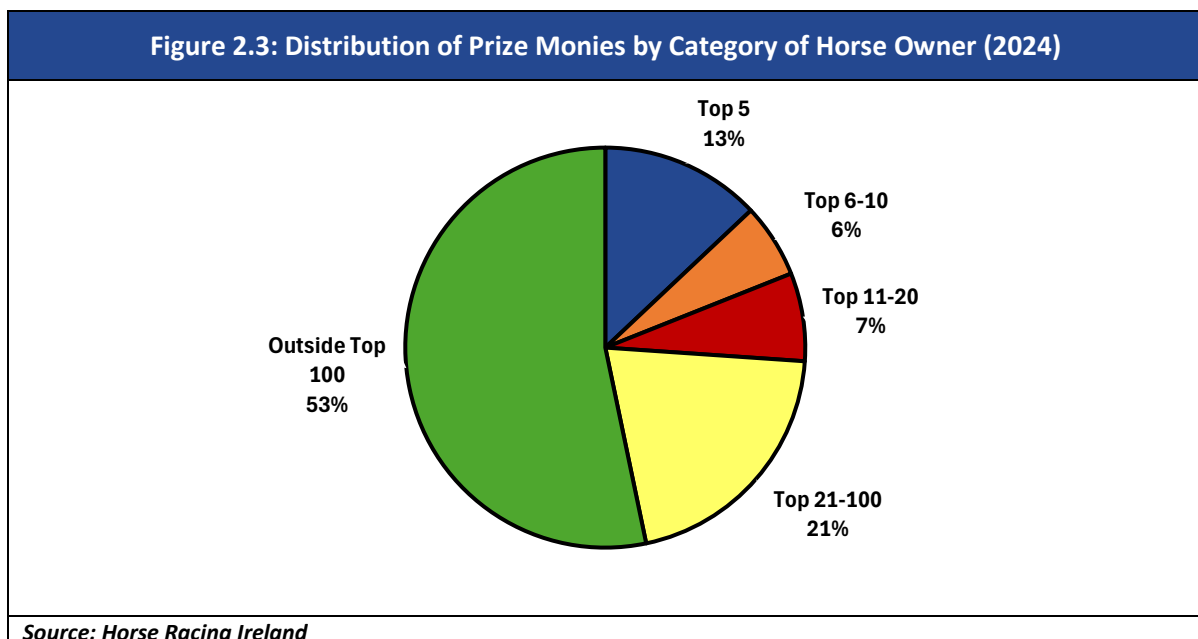
⁶ DAFM briefing note ‘Prizemoney in Horse Racing,’ May 2023.

Distribution of prize monies

The main beneficiaries of prize monies are horse owners, with over 70% accruing to this group in 2024 as shown in Figure 2.2 below although other industry participants also benefit including trainers and jockeys.



Looking at the distribution by category of horse owner, the breakdown of 2024 allocations (Figure 2.3), suggests a reasonably wide distribution of prize monies. While 13% of prize monies accrued to the top 5 owners in 2024, over half accrued to owners in the 100 plus top owner bracket. This suggests that prize monies are more likely to be benefitting owners who might not otherwise participate in racing due to the smaller scale of their operations and possible associated financial constraints.



2.5 Fund Efficacy in Ensuring Highest Animal Welfare Standards

Expenditure on animal welfare

Table 2.3 examines the recent historical trends in HRI spending on equine welfare and integrity-related services. HRI forecasts that expenditure on annual animal welfare-related expenditure is likely to reach €4.4 million in 2024 after €3.5 million in 2023. Spend on racing integrity-related services (which includes spend on activities such as anti-doping measures) reached €11.4 million or 77% of total spend in 2023. When taken together, HRI's overall spend on equine welfare and racing integrity totalled €14.9 million in 2023, representing just over 13% of total HRI expenditure.

Table 2.3: HRI Spending – Equine Welfare and Integrity Services 2014-2024 (€'000)											
	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024 (Est.)
Welfare Spend	1,500	1,700	2,100	2,100	2,300	2,300	3,100	3,300	3,300	3,500	4,400
% of Total	20.0%	20.8%	22.3%	20.5%	21.3%	20.3%	27.2%	25.0%	20.7%	23.4%	
Integrity Services Spend	5,982	6,492	7,318	8,168	8,511	9,053	8,305	9,906	12,664	11,434	-
% of Total	80.0%	79.2%	77.7%	79.5%	78.7%	79.7%	72.8%	75.0%	79.3%	76.6%	
Total Welfare and Integrity Services Spend	7,482	8,192	9,418	10,268	10,811	11,353	11,405	13,206	15,964	14,934	-
% of Total HRI Expenditure	10.3%	10.2%	10.5%	9.9%	10.4%	11.0%	13.1%	13.3%	13.8%	13.2%	-
<i>Source: HRI Welfare Queries, HRI Annual Reports.</i>											
Note: 2024 figures for animal welfare spend are forecasted. Data for total expenditure and spend on integrity services in 2024 was not available at the time of completion of this report.											

According to HRI, the body has taken a range of steps to ensure the welfare of racehorses in recent years. In 2024, HRI was forecasted to spend €4.4 million on equine welfare. The activities undertaken as part of this investment include:

- Supporting Treo Eile, a not-for-profit organisation that assists in the rehoming and retraining of retired racehorses;
- Supporting the Irish Horse Welfare Trust (IHWT), which seeks to rehabilitate, retrain and rehome retired thoroughbreds;
- Providing integrity funding to IHRB, which supports its anti-doping programme, as well as inspections;
- Providing funding to the Irish Equine Centre, which supports equine welfare through laboratory services related to the diagnosis, management, and prevention of diseases in horses;
- Launching a new Equine Care Racecourse Capital Development Scheme which aims to further enhance racecourse safety measures in Ireland;
- Supporting whole-of-life traceability initiatives for thoroughbreds;

- Supporting Racehorse to Riding Horse Ireland, which rehabilitates and retrain retired racehorses; and
- Supporting education and training initiatives related to equine welfare.⁷

HRI has indicated that it plans to continue to improve welfare standards, in line with the strategic goal in its 2024 – 2028 strategic plan to: “Provide consistent and responsible care of our people, our horses, and our environment”.⁸ Strategic priority 1.2 within HRI’s Strategic Plan is to “cultivate a culture of zero compromise in equine safety and care standards.”⁹ In the plan, HRI outlined its intentions to increase its annual welfare budget by 70% by 2028, as well as to increase its annual investment in integrity and welfare by €3.7 million through to 2028.⁸ A series of KPIs designed to measure performance under this priority are also outlined, including the following metrics (as these are new KPIs, no data was available at the time of completion of the Indecon review):

- To achieve annual improvements in the perception of equine welfare in nationally representative surveys;
- Traceability functionality to report on the last recorded responsible person by 2025;
- Support Treo Eile to connect with 800 horses per year (100% increase) by 2028; and
- Reduction in the number of racecourse fatalities on an annual basis.

Suann Review of IHRB Anti-Doping Programme

An independent review of the IHRB’s antidoping programme – which is funded by HRI - carried out by the international equine antidoping expert, Dr. Craig Suann, concluded that the programme at least matches international practice in most respects.¹⁰ It also found that the IHRB has made significant advances in recent years.” The report made 18 recommendations, that were “capable of enhancing the robustness of the programme’s processes, capabilities and capacities”. However, we note that in a discussion on Horse Welfare and Integrity and Anti-Doping issues at the most recent (November 2024) liaison meeting between DAFM and HRI, the HRI indicated that while the IHRB has implemented many of the Suann report recommendations, the implementation of the remaining recommendations would not be possible due to the financial resources available to HRI. In our discussions with the IHRB, it indicated that its estimate of the cost of full implementation of the Suann sampling and veterinary restructure recommendations by 2028 amounted to an additional €1.46 million over 2024 levels. An independent validation of this estimate was outside the scope of Indecon’s review.

⁷ HRI Welfare Queries, 2024.

⁸ HRI Strategic Plan, 2024-2028.

⁹ Ibid.

¹⁰ Dr. Craig Suann, Independent Review of the IHRB Equine Anti-Doping Programme, April 2022

2.6 Review of HRI-IHRB Governance Framework

Introduction and Background

The IHRB is the regulatory body for all horseracing in Ireland. Section 2 of the Horse Racing Ireland Act 2016 provided for a limited company to be established in accordance with the Companies Act 2014 to regulate horse racing. The Horse Racing Ireland Act 2016 provides for the IHRB as the regulatory body for all horseracing in Ireland. Section 11 of the 2016 Act provides for a funding mechanism to be in place under which the costs of integrity services provided by the IHRB are guaranteed by HRI based on an agreed annual budget. Importantly, section 42 also provides for an arbitration procedure in relation to any disagreement regarding funding for integrity services. Section 12 39A (2) of the HRI Act 2016, which became operational on 1 January 2019, requires the annual financial statements of the IHRB to be audited by the C&AG. HRI provides a significant proportion of the IHRB's annual funding (circa 80-90%) to perform its role as the regulator of horse racing and formal oversight of the IHRB rests with HRI. This oversight is underpinned by a Service Level Agreement (SLA).

Review of IHRB Financial Transactions

In June 2023, the IHRB Board was made aware of a financial accounting transaction that was in breach of governance requirements. Subsequently, Forvis Mazars were jointly appointed by the HRI and IHRB to carry out an investigation into two sets of transactions (IHRB early retirement and severance payments and transfers to and from funds of charities administered by IHRB).

The Forvis Mazars report *Financial Governance Review of Certain Transactions of the Irish Horseracing Regulatory Board* finds that while the voluntary redundancy payments fell within the rules and criteria of the scheme in question, they were paid without prior approval of HRI. A compulsory redundancy payment was found not to be covered under the scheme and again was paid without prior HRI approval. It also found that the use of public funds provided by HRI to IHRB for the purpose of a retirement payment to the former CEO was not specifically sanctioned in writing by HRI and they concluded that such a formal/written sanction would have been required under the governance arrangements for retirement and redundancy payments established by HRI.

As regards the transfers to and from the funds of charities, the IHRB has long-standing arrangements whereby its finance team provides administrative support to certain named charities and benevolent funds. Forvis Mazars concluded that a transfer of funds from/to one of these charities to/from IHRB was not in line with the governing rules, operational procedures, and constitution of the charity, and was not in compliance with the Charities Act, 2009 requirement to use these funds for charitable purposes only. On foot of these conclusions, recommendations are made concerning the documentation and approval of voluntary and compulsory redundancy and early retirement payments. Forvis Mazars also recommended that IHRB should consider whether the arrangements whereby its staff provide support for the (financial) administration activities of the named charities and benevolent funds could continue based on a lack of adequate segregation between the statutory function of IHRB and that of the charities and benevolent funds. Recommendations are also included in the event of any decision to continue support for charities and benevolent funds.

Revised HRI/IHRB SLA

The report was submitted to the Department in early November 2024. At a meeting between the Department and HRI and IHRB in mid-November, the Department was advised by IHRB of measures implemented or in progress to address the financial matters raised in the report in the form of an

implementation/action plan. At the request of the Department, HRI has recently provided the Department with an update on this plan.

One of the main actions taken by HRI and IHRB in response to the report was the conclusion of a revised Service Level Agreement (SLA) between the two bodies in late December 2024. We have reviewed this SLA.

The SLA sets out in an initial section the role of each organisation, the relationship between them and emphasises the importance of collaboration, while recognising the IHRB independent role “as regulator of the sport.” It provides for at least biannual meetings between HRI and IHRB CEOs to review IHRB performance and “governance arrangements”, with the IHRB required “at each quarterly review meeting provide formal confirmation and details of progress in the implementation of the recommendations within the Financial Governance Review of Certain Transactions of the IHRB (October 2024) prepared by Forvis Mazars.”

Section 6 (Integrity Budget and Funding) sets out arrangements for preparation and approval by HRI Board of the IHRB integrity budget. Inter alia, IHRB is required to provide share monthly management accounts and to report monthly to HRI on financial performance against budget. This section also includes detailed provisions in relation to severance payments proposals, including that these must be submitted to HRI for approval prior to circulation to staff or representatives and that any decisions by IHRB Board can only be made after funding sources have been agreed in writing by HRI. Payments can be made only after funding received and, if HRI funding used for these purposes, HRI written approval is required.

Equine Welfare is stated to be a high priority for both organisations, who commit “to work closely together and with key stakeholders to protect equine health.”

A very detailed appendix sets out a set of detailed procedures for the provision of integrity services. This includes provisions for the determination and agreement of the IHRB annual integrity budget, provisions in relation to capital projects – with additional requirements specified for projects with a cost exceeding €250,000 (where a project plan must be put in place), and projects over €1 million (where a formal agreement is required to “outline the timelines, deliverables, reporting lines and reporting requirements for the project”). It also includes provisions around the monthly payment to IHRB, monthly management accounts, as well as procurement (where compliance with public procurement policy is required and IHRB must develop and maintain an annual corporate procurement plan and a contracts database).

There are also detailed sections in this appendix dealing with the collection of licenses and fees which HRI collect on behalf of IHRB, client operations (concerning accounts for jockeys, trainers, and other participants, that HRI open at the request of IHRB), race planning, racing operations, entries and declarations, race day operations, consultation on HRI industry funding schemes, publications, IT operations, and industry training and education.

Section 12 of this appendix headed ‘Commitment to Working Together’, provides that the two organisations “commit to increased operational collaboration on efficient and cost-effective delivery of shared objectives, including a joint IT strategy and a shared services approach to key support functions which is aimed at bringing gains in capacity, effectiveness and resilience, and eliminate key person dependencies.” Four areas of collaboration where a shared services model will be used are listed (HR services, GDPR, a financial shared services centre scoping exercise, and compliance and risk services). Finally, two schedules specify an agreed data set to be transferred from IHRB to HRI and the data transfer procedures.

The SLA also indicates that the effectiveness of the agreement will be reviewed after one year.

IHRB Implementation/Action Plan

As mentioned above, HRI has recently (February 2025) provided an update to the Department on the IHRB response to the Forvis Mazars review and recommendations. Most of the recommendations and commitments made by IHRB in response are captured in the revised SLA discussed above. In response to the Forvis Mazars recommendation, the IHRB has also decided that it will cease providing financial accounting and administrative support to the supported charities and benevolent funds with effect from 30 September 2025 and has recently communicated this decision to the organisations concerned. The IHRB has also taken steps to embed risk management within the organisation in an approach aligned to that used by HRI which is stated as having received the full support of the IHRB Audit and Risk Committee. HRI has provided the IHRB risk register to the Department and has stated that the key risks are reviewed at each quarterly meeting with the IHRB in addition to reviews of financial performance and compliance with the code of practice.

2.7 Assessment and Issues Arising

DAFM Governance and Oversight Arrangements

Based on our detailed desk-based assessment of the processes and reporting documentation in respect of HRI, and our consultations with the Department, HRI and IHRB, Indecon is the overall view that the Department's financial management and governance framework for the HGRF, including its oversight arrangements governing HRI, are robust and substantively meet the requirements of the Code of Practice for the Governance of State Bodies. In support of this assessment, we would highlight the following points:

- The annual parameters letter from the Department and the Minister's stakeholder expectations letter are clear as to the Department's/Minister's expectations of HRI as regards both the Government's sectoral policy objectives for the sector and financial management and governance requirements for HRI compliance with the Code.
- For its part, the HRI Chair's corporate governance report to Minister and the CEO's confirmation of compliance indicate that the organisation is substantively in compliance with the financial management and corporate governance requirements of the Code and the conditions of financial support under the Fund.
- The Department's checklist for implementation of the requirements of the Code is comprehensive in scope and suggests that most of the requirements of the Code are being met by HRI, with valid explanations provided in the small number of exceptions.
- The Department enjoys a good relationship with HRI. There appears to be a strong performance-based dialogue between the Department and HRI, with the Department prepared to push back and challenge HRI when necessary.
- The arrangement whereby the IHRB, the independent racing regulator, is funded by the HRI which is responsible for the development of the horse racing sector, is at first sight perhaps somewhat unusual from a perspective of demonstrating and achieving regulatory independence. However, this 'arm's length' approach is designed to ensure distance between IHRB and the political system. As noted above, the HRI/IHRB SLA recognises the IHRB's independent regulatory role and, in our discussions, IHRB indicated that it was satisfied that the independence of regulatory decision making was not compromised by the

arrangement. In addition, the legislation provides for an arbitration procedure if agreement is not reached between the parties on IHRB's integrity services budget.

- Certain IHRB financial transactions were the subject of investigation and were examined through an independent external review. An implementation/action plan has been put in place by IHRB in response to the recommendations of this review and this is subject to quarterly monitoring by the HRI. Most of the recommendations are captured in a revised service level agreement between the two bodies which appears robust and comprehensive and which the Department is satisfied with.

Efficacy and Value for Money in Utilisation of HGRF Funding

In relation to utilisation of HGRF funding by the HRI, Indecon would highlight the following:

- While acknowledging the arguments around the importance of prize money for the international competitiveness of the sector and in acting as a trade stimulus, we would observe that some of the benefits associated with or linked to prize monies are essentially private in nature, including increased bloodstock values.
- In addition, the success of the sector – which is now recognised as a world leader in attracting foreign direct investment – is such that the rationale for a continuing high rate of prize money subsidisation may not be as strong going forward.
- On the other hand, there is a stronger public policy rationale for investment in animal welfare and racing integrity, given the 'public good' nature of the benefits associated with these investments and the risk that the sector might otherwise under-invest in these areas.
- The HRI (and IHRB) has an ambitious welfare agenda, but IHRB has indicated that more resources (an estimated €1.5 million by 2028) are needed to fully implement the outstanding Suann report recommendations.

3 Review of Governance of RCÉ Utilisation of Fund

3.1 Introduction

This section examines the governance of the Fund from the perspective of oversight of RCÉ's receipt of support under the Fund. We also assess RCÉ's utilisation of the Fund to subsidise prize monies, and consider the efficacy of the Fund in ensuring attainment of the highest standards of greyhound welfare.

3.2 RCÉ Role and Funding

Rásaíocht Con Éireann (RCÉ) is a commercial state body responsible for the control and development of the greyhound industry. RCÉ (previously Bord na gCon) was established under the Greyhound Racing Acts 1958 to 2019, which "gave the organisation wide powers to regulate all aspects of greyhound racing in the Republic of Ireland including the licensing of the different tracks, the issuing of permits to officials, bookmakers, trainers and the implementation of the rules of racing."¹¹ The organisation's mission statement is to "deliver a commercial, well-regulated Greyhound Racing and Breeding Industry whilst enabling the delivery of a customer centred, highly exciting and value led entertainment experience."

RCÉ is central to the regulation and development of the Irish greyhound industry, with its key responsibilities including:

- Supplementing prize money within the greyhound racing industry;
- Providing development loans and grants to greyhound tracks to support infrastructural development;
- Advertising and marketing on the national and international level;
- Developing and improving greyhound racing stadia nationwide; and
- Monitoring and ensuring the wellbeing of greyhounds in Ireland.

RCÉ's main source of income is through the Fund (which accounted for over 90% of its income in 2023) supplemented by other income sources, including contributions from owners and sponsors and income from racing and media activity.

In terms of the rationale for provision of HGRF support to the industry, a 2021 report for RCÉ estimated that the greyhound racing industry in Ireland had a total economic impact of over €132 million in 2019, and that over 4,000 jobs full and part-time jobs in Ireland were supported by the greyhound industry, with many of these jobs in rural communities.¹² According to DAFM, the funding provided to the greyhound racing sector helps sustain a long-standing tradition as the industry is part of the social fabric of this country. This funding is seen as underpinning economic activity across the country and as playing a particular importance in rural Ireland. The Department also notes that the future of the industry is dependent on a strong governance platform and on the industry having the highest standards of integrity and welfare founded on a strong regulatory system.

¹¹ About GRI. See: www.grireland.ie/About-GRI/about-gri/.

¹² The Economic & Financial Significance of the Irish Greyhound Industry, July 2021. See: www.grireland.ie/globalassets/report-pdfs/jim-power-2021/the-economic-financial-significance-of-the-irish-greyhound-industry-jim-power-report-july-2021-gri.pdf.

3.3 DAFM Governance Framework and Arrangements for Oversight of RCÉ

Horse and Greyhound Racing Procedures Manual

As noted in Section 2.3, the governance framework for the horse and greyhound racing sector, including for the oversight of RCÉ, is set out in the Department's 'Horse and Greyhound Racing Procedures Manual.'

As a State Body under the aegis of the Department, RCÉ is bound in its procedures and practices to have regard both to the provisions of the Greyhound Racing Acts under which it was established and to the Code of Practice for the Governance of State Bodies. The DAFM has a role in guiding policy via-á-vis RCÉ and in seeking assurance in relation to its compliance with the provisions of the Code.

Arrangements for Oversight of RCÉ

The Department operates a range of procedures and processes to ensure that RCÉ complies with its governing legislation, the Code, as well as associated circulars and any other relevant legislation. This governance framework for RCÉ comprises formal oversight documentation, full consideration of financial statements, maintenance of communication at all levels and Ministerial appointments to the Board. Some of the key governance documents and processes include the following:

- a Shareholder Letter of Expectation issued at various intervals by the Minister to RCÉ;
- a formal annual letter issued by the Department setting out parameters and conditions relating to the RCÉ annual allocation under the Fund;
- the provision of a corporate governance report by the RCÉ Chair to the Minister on an annual basis;
- the completion of an annual checklist to assess compliance with the Governance Code;
- formal meetings, including biannual liaison meetings between officials in the Department's Horse and Greyhound Racing Division and RCÉ officials, as well as an annual meeting between the RCÉ Chair and Chief Executive with the DAFM Secretary General;
- regular ongoing contact between DAFM officials and RCÉ executives;
- the requirement of reports on certain matters, including a quarterly report on RCÉ's care and welfare programme and expenditure;
- clearly defined processes for the consideration of Fund drawdown requests; and
- clearly defined processes for the consideration of annual reports and audited financial statements, culminating in the laying of these documents in the Oireachtas library.

Indecon has examined the key governance documents and processes listed above and captured in the Governance Code checklist, based on the documentation provided by the Department, and informed by consultations with DAFM officials.

Shareholder Expectation Letter

The most recent shareholder expectation letter (SEL) - from the Minister to the RCÉ Chair - was issued on 4th March 2025. The purpose of the letter is to provide guidance to the RCÉ Board with respect to the Government's current objectives for RCÉ. These objectives relate to governance arrangements (including roles and responsibilities of the Board, Chairperson, and CEO of RCÉ), dividends policy, return on capital, animal welfare, sectoral policy objectives, and adherence to several specific circulars and guidance issued by the Department of Public Expenditure NDP Delivery and Reform, among others.

The SEL is detailed and comprehensive in nature. The letter noted the importance of a strong welfare and integrity foundation to the greyhound industry and the Minister's expectation that the RCÉ "continue[s] to focus and develop this area in conjunction with industry stakeholders, to ensure the highest standards of integrity and welfare are maintained." The letter also reaffirms that 10% of the RCÉ current allocation from the Fund must be ringfenced for these integrity and welfare purposes.

Five appendices provide specific additional guidance on various topics, as follows:

- Appendix 1: Financial Performance Measures;
- Appendix 2: Role of the Board;
- Appendix 3: Roles of the Chairperson;
- Appendix 4: Roles and Responsibilities of the Chief Executive Officer of a State Body under the aegis of the Department of Agriculture, Food and the Marine; and
- Appendix 5: Roles and Responsibilities of Accounting Officer.

DAFM Parameters letter

The most recent annual parameters letter from the Department to the RCÉ CEO was issued on 4 February 2025. The letter confirmed the 2025 allocation from HGRF to RCÉ (€19,820,500). This allocation from the Fund was stated as being "necessary to support the solvency of both RCÉ itself and the wider industry during 2025" with the Department affirming that RCÉ would need to continue to structurally support the industry during 2025 "to ensure its long-term viability."

The letter confirmed the distribution of the allocation as between capital and current expenditure. It also stipulates that a minimum of 10% of current funding is to be spent on welfare, and not more than 60% on prize money. The Department's communication refers to the commitment in the Programme for Government to improved animal welfare in the greyhound sector and makes clear that HGRF funding is contingent on the implementation of animal welfare measures. The Department stipulates that RCÉ must provide quarterly reports on the continued implementation of its care and welfare programme, and the RCÉTS traceability system, to enable the Department to monitor progress in this area.

In terms of financial management, the parameters letter also sets out specific conditions relating to the provision of funding. These include requirements for RCÉ to comply with, inter alia, its governing legislation, the provisions of Code of Practice for the Governance of State Bodies and various circulars and guidelines issued by the Department of Public Expenditure, Infrastructure, Public Services, Reform and Digitalisation. RCÉ is also required to provide the Department with information and briefing as required over the course of the year. The letter sets out an extensive list of financial documentation that RCÉ must provide to the Department including annual accounts, breakdowns of RCÉ expenditure allocations in line with the parameters outlined in the letter and the provision of a certificate of assurance (to be signed by RCÉ Chair and CEO) to the effect that funding was allocated in line with the conditions set out in the letter (once the 2025 HGRF allocation has been expended).

Chair's corporate governance report to Minister

The most recent iteration of this annual reporting requirement (May 2024) took the form of a 6-page letter from the RCÉ Chair to the Minister. The report is comprehensive in nature covering, inter alia, financial performance, compliance with corporate governance requirements, risk management, and procurement. The Chair also provides an update on progress with welfare and integrity issues provided under an "industry commentary" section, including on the RCÉ traceability programme.

DAFM Governance Code Checklist

As is the case in relation to HRI, DAFM also uses a checklist to assess RCÉ compliance with relevant provisions of the Code of Practice for the Governance of State Bodies. Indecon's review of the checklist has indicated substantive compliance by RCÉ with the requirements of the Governance Code, except in three instances, where DAFM has provided explanations, as follows:

- Under the business and financial reporting heading, the checklist indicates that the RCÉ's annual reports and accounts for 2023 which were not published within four months of end of the financial year as required under the Code. This is explained by reference to the Comptroller and Auditor General's audit not being completed until 15 May 2024.
- Under the section dealing with the role of the Board, it is indicated that the Board has not complied with the Code requirement to agree the body's strategic aims with the Minister and parent Department to the extent relevant, but this is explained on the basis that the Board was at the time of writing finalising its strategic plan.
- Under relations with the Oireachtas, Minister and parent department, the section dealing with the stakeholder expectation letter (see discussion below), explains the absence of an up-to-date letter by stating that the previous letter dated 15th September 2022 is "now under revision". The revised letter is discussed above.

CEO confirmation of compliance

The confirmation takes the form of a letter signed by the CEO and CFO of RCÉ to the Department and is one of the conditions of HGRF support provided for in the DAFM parameters letter (discussed above). The most recent iteration which we reviewed is dated January 2024 which provides a series of financial assurances for 2023 based on draft management accounts for that year.

DAFM/RCÉ liaison meetings and other engagements

Officials from the Horse and Greyhound Racing Division in the Department meet formally twice a year with the RCÉ executive team in a liaison meeting. These meetings are organised on the basis of an agreed agenda, and we reviewed the agenda and meeting note for the two engagements held in 2024. Our desk-based review found that the agendas and discussion appear to have been comprehensive and covered a range of standing issues including corporate governance, legal issues, financial performance, and welfare and integrity, with several specific sub-issues covered under each of these items. For example, focusing on the September meeting, a total of 10 items (excluding any other business) were the subject of discussion.

Under the corporate governance items, the minutes of both meetings indicate that the RCÉ was asked to confirm its compliance with the Code. At the September meeting, under the welfare and integrity item, there was specific discussion of three separate sub-items - an update on current initiatives, the latest phase and functionality of the RCÉ traceability system, and the RCÉ quarterly welfare reports. The minutes of both this (virtual) meeting and the earlier March meeting (which was held in person at RCÉ headquarters) suggest that the discussions are characterised by an open dialogue with the Department officials raising questions and appearing to "push back" on some issues.

In our discussions with officials in the Horse and Greyhound Division, we probed the value and utility of the liaison meetings. The Department is satisfied with the bi-annual meetings and finds them to be very useful and effective in keeping the connection going between the Division and RCÉ. We also understand from our discussions that there is substantial regular and more informal liaison between officials in the Division and RCÉ throughout the year, with officials and RCÉ executives in touch on ongoing issues on a weekly basis. The officials are satisfied with their interactions with RCÉ and were complementary of the responsiveness of RCÉ in dealing with issues raised by the Department in these ongoing interactions.

In addition to the biannual liaison meetings, the RCÉ Chair and CEO also meet once a year with the Secretary General of the Department and RCÉ meet the Minister annually to discuss their estimates/budget request for the following year.

For its part, RCÉ executives were of the view that the current level of engagement with the Department is at an appropriate strategic level. They noted that the bi-annual liaison meetings follow an agenda determined at the Department level and were of the view that two meetings per year is adequate, and that a greater frequency was unnecessary and would risk agenda and strategic slide.

3.4 Fund Utilisation to Subsidise Prize Monies

As noted earlier, the HGRF accounts for the bulk (over 90%) of RCÉ income. We consider in this section the use of the Fund in supporting prize money and animal welfare in the sector.

Funding and Role of Prize Monies

As noted earlier, RCÉ can only allocate a maximum of 60% of its HGRF current allocation to prize monies, and must allocate at least 10% to Welfare & Integrity. Based on data available for 2023, when it received €18.2m from the HGRF, RCÉ allocated 40.7% of this funding to prize monies and 17.4% to welfare and integrity, as shown in Table 3.1 below.

Table 3.1: RCÉ Allocation of HGRF Funding (2023)		
Allocation	€	%
Prize Monies	7,408,802	40.7%
Welfare & Integrity	3,150,000	17.4%
Other	7,631,198	41.9%
Total	18,200,000	100%
<i>Source: RCÉ Annual Report, 2023</i>		

The funding of prize money by RCÉ is laid out in Table 3.2. The total prize money for greyhound racing meetings in 2023 was €8,968,388. Of this, 83% of the prize money (€7,408,802) was provided by the RCÉ (via the Horse and Greyhound Racing Fund), while the remaining 17% (€1,559,586) was sourced through contributions by greyhound owners (race entry fees) and sponsors (direct contributions). This split has been consistent over time, as RCÉ contributed 82% in 2019, 81% in 2020, 77% in 2021, and 82% in 2022, with the remainder coming from entry fees and sponsorships.

Table 3.2: RCÉ Prize Money Funding 2023

Source	€	%
RCÉ (via Fund)	7,408,802	83%
Contributions from Owners/Sponsors	1,559,586	17%
Total	8,968,388	

Source: RCÉ Annual Report 2023

Distribution of Prize Money

Table 3.3 below displays the distribution of Greyhound racing prize money across recipient categories in 2024. Prize money is primarily distributed to owners of Greyhounds (91%), followed by trainers (6%), and breeders (1%), while other prize money recipients include the Retired Greyhounds Trust, the Mullingar Injury Fund, and redistribution to tracks (combined 2%).

Table 3.3: RCÉ Prize Money Distribution 2024

Recipient	Prize Monies - €	%	No. of Recipients	%
Owners	8,747,153	91.3%	3,617	92.8%
Trainers	557,019	5.8%	126	3.2%
Breeders	134,778	1.4%	138	3.5%
All Other Payments	144,497	1.5%	16	0.4%
Total	9,583,446	100%	3,897	100%

Source: RCÉ

Table 3.4 below displays the distribution of Greyhound racing prize money across owners in 2024. The prize money is distributed very broadly across owners with the top five owners only receiving 5% of prize money. The wide distribution and absence of concentration among top owners suggests that prize monies are more likely to be benefitting owners who might not otherwise participate in racing due to the smaller scale of their operations and possible associated financial constraints.

Table 3.4: RCÉ Prize Money Distribution to Owners 2024

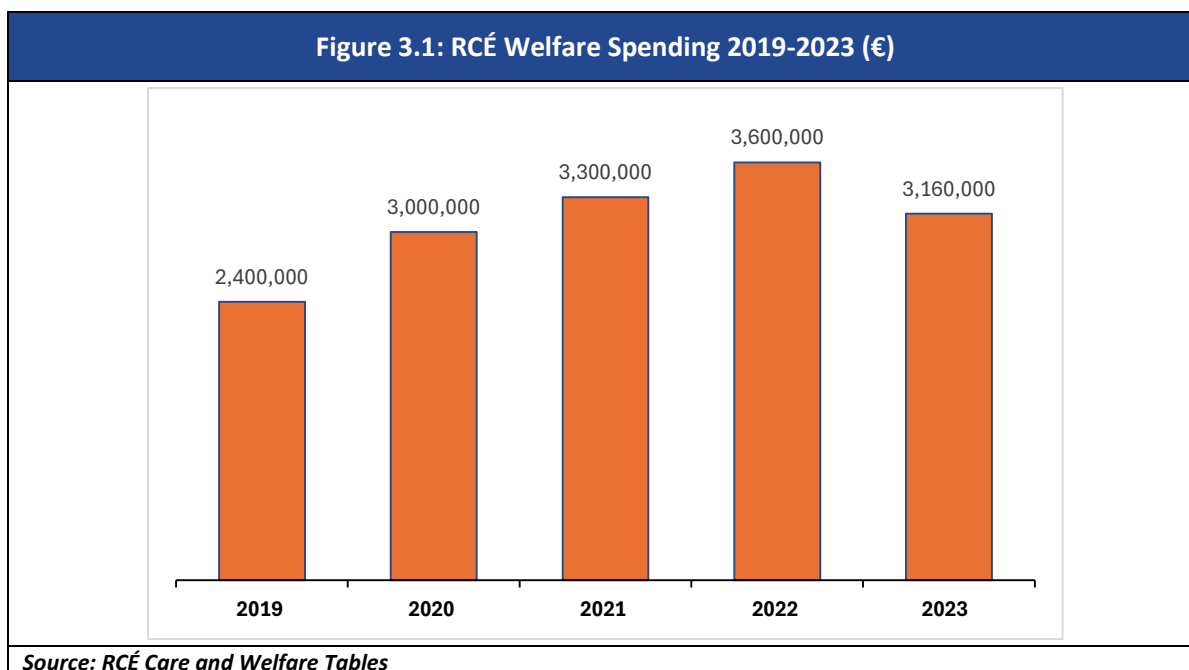
Owners	€	%
Top 5 Owners	423,957.05	5%
Top 10 Owners	621,912.80	7%
Top 20 Owners	954,369.25	11%
21 st -100 th Owners	1,489,856.12	17%
101 st + Owners	6,302,927.28	72%
Total Paid to Owners	8,747,152.65	100%

Source: RCÉ

3.5 Fund Efficacy in Ensuring Highest Animal Welfare Standards

Expenditure on animal welfare-related activities

RCÉ has taken range of steps in recent years to address the issue of greyhound welfare. Through to 2023, RCÉ allocated €3.16 million to Traceability, Care, and Welfare matters with the objective of moving “towards the implementation of the highest possible welfare standards at kennels and racing facilities”. Figure 3.1 below shows how RCÉ’s total welfare spending from 2019 to 2023.



Welfare activities undertaken as part of this investment include:

- The Greyhound Care Fund, which is “dedicated to funding a variety of initiatives for the care and welfare of the greyhound, including rehoming initiatives, greyhound injury support scheme, greyhound care centres, foster care centre, a new traceability system and other actions all designed to support the care and welfare of the racing greyhound.” This Fund’s goals have been supported by RCÉ, as “50% of all existing sponsorships is assigned to the fund, while retaining prize money at current levels. Additionally, 10% of all admissions and restaurant packages have been assigned to the Care Fund from September 2019, with 5% of net Tote income assigned to the Care Fund from November 2019”;¹³
- The ongoing implementation of the RCÉ traceability system, to monitor the location and lifecycle of racing greyhounds, with over 50,000 greyhounds on the system as of Q3 2024;
- The preparation of greyhounds for rehoming;
- The construction and running of Greyhound Care Centres that provide high quality accommodation for greyhounds;
- The construction and running of Greyhound Foster Care Centres;

¹³ RCÉ Care and Welfare Programme 2024.

- Financially incentivising the rehoming of greyhounds in Ireland via the Irish Retired Greyhound Trust;
- Providing financial supports for rehoming agencies;
- Introducing and implementing a greyhound injury support scheme to financially assist in the provision of aid to injured greyhounds;
- The establishment of a confidential phone line to report greyhound welfare breaches;
- The improvement and intensifying of the RCÉ inspection regime of greyhound establishments;
- The rehoming of retired greyhounds in the USA;
- The provision of dog utility ambulances;
- Supporting the Kennel Improvement Scheme, which assists in the improvement and modernisation of greyhound kennel facilities in Ireland; and
- The provision of care and welfare resources.

Table 3.5 provides a breakdown of RCÉ spending on welfare between 2019 and 2023. Overall expenditure on greyhound welfare increased by 32% over this period, with activities including Greyhound Care Centres, Foster Care Centres, and the Kennel Improvement Scheme recording significant increases.

Table 3.5: RCÉ Welfare Spending 2019-2023 (€)					
	2019	2020	2021	2022	2023
Greyhound Care Fund	247,000	223,000	238,000	818,000	1,270,000
Greyhound Care Centres	N/A	N/A	61,000	65,000	197,000
Foster Care Centres	-	178,000	272,000	452,000	554,000
Greyhound Injury Support Scheme	600	2,500	4,000	12,000	10,000
Financial Supports for Rehoming Agencies	-	23,000	38,000	28,000	-
Provision of Dog Utility Ambulances	N/A	24,000	24,000	36,000	-
Kennel Improvement Scheme	N/A	N/A	N/A	27,000	72,000
Financially Incentivising Rehoming of Greyhounds Through IRGT	-	29,000	42,500	14,000	7,900
Other Traceability and Welfare Matters	2,152,400	2,520,500	2,620,500	2,148,000	1,049,100
Total Allocation to Traceability, Care, and Welfare Matters	2,400,000	3,000,000	3,300,000	3,600,000	3,160,000
% of Total RCÉ Expenditure	13.5%	21.6%	20.9%	20.9%	16.6%
Source: RCÉ Care and Welfare Tables, RCÉ Annual Reports.					

Table 3.6 below shows the progress that has been made across different greyhound welfare-related metrics as a result of the increased welfare funding in recent years. The number of retired greyhounds rehomed in America has increased from 37 in 2019 to over 540 in 2023. The number of inspections carried out by welfare officers have increased significantly since 2019, as have welfare investigations. Perhaps most notably, the greyhound traceability system has rapidly grown, with over 45,000 greyhounds being subject to the traceability system in 2023 (this exceeded 50,000 by Q3 2024).

Table 3.6: RCÉ Welfare Progress 2019-2023					
	2019	2020	2021	2022	2023
Retired Greyhounds Rehomed in USA	37	44	137	569	542
Phone Line Reports	143	122	94	62	40
Welfare Officer Inspections	615	455	1,221	2,674	1,882
Welfare Investigations	190 (combined)		235	583	421
Convictions	-	1	2	2	1
Greyhounds Subject to Traceability System	-	-	23,760	35,701	45,401
<i>Source: RCÉ Care and Welfare Tables.</i>					

3.6 Assessment and Issues Arising

Based on our desk-based assessment of the processes and reporting documentation in respect of RCÉ, and our consultations with the Department and RCÉ, we are of the view that the oversight arrangements governing RCÉ are robust and meet the financial management and governance requirements of the Code. In support of this assessment, we would make the following points:

- The annual parameter's letter from the Department and the Minister's stakeholder expectations letter are clear as to the Department's/Minister's expectations of RCÉ as regards both the Government's policy objectives for the sector and financial management and governance requirements for RCÉ compliance with the Code;
- On the RCÉ side, the Chair's corporate governance report to Minister and the CEO's confirmation of compliance indicate that the organisation is substantively in compliance with its financial management and corporate governance requirements under the Code and the conditions of financial support under the Fund;
- The Department's Code of Governance checklist is comprehensive in scope and indicates that the requirements of the Code are being met and checked;
- The Department enjoys a good relationship with RCÉ; and
- There appears to be a strong performance dialogue between the Department and RCÉ, with the Department prepared to push back and challenge the RCÉ when necessary.

In relation to the utilisation of the Fund by RCÉ, Indecon would highlight the following findings from our review:

- RCÉ and the greyhound sector generally is very dependent on the financial support provided by the HGRF, particularly as regards prize money;
- While acknowledging the wide distribution of prize money across owners, the public policy rationale for supporting care and welfare investment by the RCÉ is stronger than for prize money given the public good nature of the benefits associated with the former and the probability that the industry might otherwise under-invest in welfare; and
- While RCÉ has made some progress on the welfare agenda with a welfare programme being implemented and associated metrics in place to measure progress, more needs to be done and it would be desirable that targets are set for the various elements of the RCÉ care and welfare programme.

4 Overall Conclusions and Recommendations

4.1 Introduction

In this section, we integrate the detailed analysis and assessment undertaken in the preceding sections, to develop our overall conclusions regarding DAFM's governance of the Fund and of the bodies in receipt of support from the Fund, and in relation to the specific issues of utilisation of the Fund to subsidise prize monies, and the efficacy of the Fund in ensuring the highest level of animal welfare standards. We then present recommendations on foot of the review.

4.2 Overall Conclusions

Overall Financial Management and Governance of Fund and Supported Bodies

Our overall conclusions in relation to the Department's overall governance of the Fund and of the bodies in receipt of funding, as well as the governance framework in place between HRI and the IHRB, are as follows:

- The Department's oversight of two bodies is robust and meets the requirements of the Code. The liaison and other engagements between the Department and the two bodies are organised around clear, focused agendas.
- There is a good ongoing performance dialogue around the use of Fund resources and other issues between the Department and two bodies.
- The financial management, reporting and governance processes are clearly set out and understood by all parties.
- There would appear to be a good relationship between the Department and each of the two bodies, characterised by good understanding of their respective roles, along with a good balance between ensuring the autonomy of the bodies, on the one hand, and their engagement with the Department's governance/oversight role, on the other.
- An external review of certain IHRB financial transactions has resulted, *inter alia*, in a revised service level agreement between the HRI and the IHRB. The Department is satisfied with the overall response by HRI and IHRB to the review and the agreement appears robust and provides a comprehensive governance framework that recognises the regulatory independence of the IHRB. It will be important, however, that the Department continues to monitor closely the implementation of the revised SLA.

Utilisation of Fund for Prize Monies and Efficacy of Fund in Ensuring Animal Welfare

The HGRF allocations of current monies to the HRI and RCÉ are subject to the allocation of minimum shares to welfare/integrity purposes (20% and 10%, respectively) and maximum proportions to prize money (80% and 60%, respectively). Our conclusions in relation to the relative effectiveness and value for money of the Fund in respect of these two areas are as follows:

- The Department has placed a strong emphasis on animal welfare issues with the importance of progressing the welfare agenda called out in the Minister's stakeholder expectations letter and the annual parameters letter to the two bodies. Welfare and integrity issues also feature as a standing item on liaison meeting agendas between the Department and the two bodies.

- Both RCÉ and HRI are cognisant of the importance of animal welfare, which is an existential issue, particularly for RCÉ in the case of the greyhound sector.
- However, while welfare is receiving greater focus by HRI, IHRB and RCÉ, more needs to be done. We note the progress made by RCÉ on a range of metrics used to monitor its care and welfare programme, but it would be preferable if targets were set and agreed with the Department in respect of these indicators.
- The IHRB (through HRI) has estimated that the cost to implement outstanding Suann report recommendations would be €1.5 million. It will also be important for the Department to monitor tightly the key performance indicators for equine safety and care set by HRI in its strategic plan and the commitment to increase its annual welfare budget by 70% by 2028.
- Prize money is important for sustaining competitiveness of horse racing sector and supporting investment, but the success of the industry suggests that there could be an element of deadweight in HGRF allocation to prize money allocation.
- The greyhound racing industry is very dependent on the HGRF to fund prize monies, with 83% of the prize money provided by RCÉ via the Fund. This compares with 61.5% of horse racing prize monies supported by the Fund.
- Overall, there is a stronger public policy rationale for funding of welfare and integrity programmes than for prize money, given the public good features of the former and the risk of under-investment in these areas by the sector.

4.3 Recommendations

On foot of this review, Indecon has identified the following recommendations, with the objective of further enhancing the financial management and governance of the Horse and Greyhound Racing Fund.

Table 4.1: Recommendations	
1	IHRB governance issues should be a standing item on agenda for DAFM/HRI liaison meetings.
2	The Department should continue to monitor closely implementation of the revised HRI/IHRB SLA.
3	The share of HGRF ringfenced for welfare and integrity purposes for both RCÉ and HRI should be increased over the medium term and communicated in the annual parameters letter to the bodies.
4	HRI should provide regular the reports to the Department on the equine care and welfare key performance indicators set out in its strategic plan and the Department should monitor these closely.
5	The Department should agree stretch targets with the RCÉ in respect of its care and welfare programme and review these on a regular basis.
<i>Source: Indecon</i>	

Annex 1 DAFM Governance Code Checklist

DAFM Checklist Issued to HRI and RCÉ re Code of Practice for the Governance of State Bodies		
Item No.	Checklist Heading	Subsections
1.	Role of the Board	Role of the Board
		Statement of Strategy
2.	Role of the Chairperson	Role of the Chairperson
3.	Role of Board Members	Role of Board Members
4.	Board Effectiveness	Board Effectiveness
5.	Code of Conduct, Ethics in Public Office, Additional Disclosure of Interests by Board Members and Protected Disclosures	Code of Conduct, Ethics in Public Office, Additional Disclosure of Interests by Board Members and Protected Disclosures
6.	Business and Financial Reporting	Business and Financial Reporting
		Additional Reporting Requirements
7.	Risk Management, Internal Control, Internal Audit and Audit and Risk Committees	Risk Management, Internal Control, Internal Audit and Audit and Risk Committees
8.	Relations with the Oireachtas, Minister and Parent Department	Relations with the Oireachtas, Minister and Parent Department
		Parent Department Oversight Role
		Roles and Responsibilities
		Performance Delivery Agreements: Non-Commercial State Bodies
		Shareholder Expectation Letter: Commercial State Bodies
		Periodic Critical Review: Non-Commercial State Bodies
		Procedures for Procurement
		Property Acquisition and Disposal of Surplus Property
		Tax Compliance
9.	Remuneration and Superannuation	Remuneration and Superannuation
		Commercial State Bodies
		Non-Commercial State Bodies
		Fees to Board Members
		Travel and Official Entertainment
10.	Quality Customer Service	Quality Customer Service
Source: DAFM		

Annex 2 Overview of Approaches to Horse Welfare in Selected Countries

United Kingdom

The British Horseracing Authority (BHA) is responsible for the administration, regulation, and governance of the horseracing industry in Britain.¹⁴ The BHA is primarily funded via the Horserace Betting Levy (via fees from racecourses). Through this role, it oversees:

- The regulation and governance of the sport;
- The health, development, and growth of the sport;
- The health and welfare of the sport's horses and people; and
- A number of other administrative items (licensing, racing administration, etc.).

Regarding animal welfare, “the BHA aims to prioritise the health and welfare of racehorses and sets standards to ensure they receive first-class care and attention.” The BHA's *Retraining of Racehorses* charity aims to retrain and rehome retired racehorses. In addition to this, a £3 million grant to drive forward equine welfare projects across Britain was announced in 2022.

The Horse Welfare Board was established as an independently chaired organisation to produce a cohesive and comprehensive welfare strategy to serve as a guideline for the entire horseracing industry. The Horse Welfare Board is chaired by Dr. Barry Johnson, former President of the Royal College of Veterinary Surgeons. In its most recent strategic plan, the Horse Welfare Board notes that the Horserace Betting Levy Board has allocated over £35 million to veterinary research.¹⁵

France

France Galop is responsible for overseeing and controlling the thoroughbred horse racing industry in France.¹⁶ France Galop is primarily funded via a levy on horse racing betting in France. Through this role, France Galop's primary responsibilities include:

- Anti-doping regulation;
- Regulating racing;
- Ensuring the health of its professionals;
- Rewarding stable staff;
- Animal rights;
- Financing the equine industry; and
- Responsibility for the environment.

France Galop places a great deal of importance on animal welfare. Welfare is considered throughout the French Racing Code, and France Galop takes great measures to prevent doping, allocating €10 million annually to this endeavour. Additionally, France Galop participates in a number of welfare initiatives, including retraining and rehoming retired racehorses.

¹⁴ British Horseracing Authority – What we do. See: www.britishhorseracing.com/about/the-bha/what-we-do/.

¹⁵ A life well lived – Horse Welfare Board Strategic Plan 2020-2024. See: media.britishhorseracing.com/bha/Welfare/HWB/WELFARE_STRATEGY.pdf.

¹⁶ France Galop – Our Responsibilities. See: www.france-galop.com/en/our-responsibilities?.

Australia

Racing Australia is responsible for overseeing and governing the thoroughbred horse racing industry in Australia.¹⁷ Racing Australia is largely funded via commercial services and Australian Stud Book fees. Through this role, Racing Australia's primary areas of jurisdiction include:

- National rules;
- National integrity;
- National and international advocacy;
- Research and analysis;
- Identifying and maximising best practice;
- Recognising and rewarding excellence in the industry; and
- Seeking to identify emerging issues including animal welfare and provide leadership via a common policy approach including minimum standards.

Racing Australia places a great deal of importance on animal welfare. Welfare is considered throughout the Australian Rules of Racing and the Australian Stud Book. Additionally, Racing Australia invests into traceability and other welfare measures, as well as assisting in the rehoming of retired racehorses.

¹⁷ Racing Australia – Our Role. See: www.racingaustralia.horse/Aboutus/Role-and-Services.aspx.