

Written Comments – Safety and Health in the Horse Racing Industry NIOSH Docket: NIOSH 104

Concerning on site emergency medical services (EMS):

The issue of whether or not on site EMS should be at the ALS (ACLS / Paramedic) level is just one aspect that should be considered when evaluating medical care available at race tracks. In order to assess whether or not jockeys (and/or exercise rider, etc.) have access to quality medical care in the event of a traumatic injury, you need to look at the full spectrum of care. The level of care necessary at the track should be based upon, among other things, average response times and level of 911 EMS, proximity to local hospitals, and access to trauma care at a recognized trauma center. Regardless of the level and quality of care available on site, if the availability and quality of in hospital care (e.g. a trauma center) is lacking the outcome of a traumatic injury may be less than desirable. A paramedic may be able to stabilize a critical trauma patient, but they cannot provide the definitive care (e.g. surgery) necessary to that patient's life. A severely injured jockey may be better off with a basic life support (BLS) ambulance on site and a trauma center nearby than with an ALS ambulance on site with a long transport to a trauma center or no trauma center at all.

It is not appropriate to set a blanket standard of ALS ambulance service at race tracks. The overall system of (emergency) medical care should be evaluated to meet the needs of jockeys. Based on this evaluation, the appropriate level of on site medical care can be determined.

Concerning increasing jockey weights:

Shifting jockeys weights up so that current jockeys will (may) not have to take drastic measures (e.g. purging, sweat box) to make weight is not the answer to the jockey weight issue. If the weight range is just shifted upwards, a new group of slightly heavier jockeys, who currently weigh too much to be a jockey, will struggle to make weight and in turn take drastic measures to make their weight. Regardless of the weight standards, someone who wants to be a jockey, who naturally weighs more than the allowable weight, will try anything to lose weight in order to ride. Some other method of ensuring that jockeys maintain a "healthy weight" (e.g. percent body fat) needs to be considered.

Concerning various environmental health issues:

Allegations have been made concerning environmental health hazards from water used to irrigate tracks, dust generated from dirt tracks, and lead weights. Before time and money are spent to develop "solutions" to correct the alleged hazards, a factual determination as to whether or not any of these hazards actually exist should be made. Regulations and standards should not be promulgated and enforced based on anecdotal information and

pure speculation. How about some reliable research based facts before we give any credence to biased and unscientifically based opinions.

General Comment:

A legitimate review/evaluation of health and safety in the horse racing industry cannot be driven and/or controlled by a private organization with an agenda. The horse racing industry is comprised of a variety of individuals and entities (e.g. track owners and operators, jockeys, trainers, and horse breeders and owners, etc.). Any outcomes / changes generated from this process need to be based on fact, not opinion, and must result from equal input from all interested parties, not just one.