

Prevention of Adverse Analytical Findings

Trainer Guidance

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Introduction

This document is designed to provide some assistance to trainers in seeking to prevent Adverse Analytical Findings (AAF). Within it you will find suggestions from the British Horseracing Authority (BHA) on what you can do around areas such as medication (equine and human), feed, human food and drink, and recreational drugs, to help avoid horses in your care returning a positive sample.

The document does not negate the need for all trainers to read and understand the <u>Rules of Racing</u> and the additional <u>guidance documents</u> published on the BHA website on this subject, and it should not be taken as an exhaustive list or a replacement for your own procedures and policies to minimise your own risks of breaching the Rules.

If you have any questions, please contact: anti-doping@britishhorseracing.com.

Background

Each year the BHA samples horses both on and off the racecourse to identify any trends in medications used in the training environment, as well as any substances that may impact a horse's performance during a race. Every year thousands of samples are collected, some of which result in Adverse Analytical Findings (AAF).

An AAF, sometimes referred to as a positive sample, triggers a BHA investigation, which will include efforts to try and identify the potential source of the AAF. A trainer will receive no sanction for an AAF only if **they** are able to establish the precise route as to how the Prohibited Substance entered their horse's body **and** that they had taken all reasonable precautions to avoid violating the relevant anti-doping Rules. **The horse will, in all cases, be disqualified from the race.**

Many positive samples are found to be the likely result of contamination or inadequate withdrawal times.

The trainer is the person responsible for the care of each horse they have in training. It is the current, or most recent trainer, as the responsible person, who is usually accountable for any rule breaches surrounding a positive sample. The definition of a responsible person can be found <u>here</u>, within the list of definitions. It is the trainer's responsibility to have protocols and policies in place to try and prevent an AAF and to ensure all staff are aware of relevant policies and receive adequate and regular training on the subject. In the case of an AAF, a trainer should be able to provide documented evidence of your policies, how they are implemented, managed and checked.

Common Causes of AAF

The following guidance highlights some of the most common causes of a positive sample, but this is by no means an exhaustive list. Further guidance can be found on the BHA <u>Equine Anti-Doping</u> pages.

Medication control

Detection time

Many, but not all, routine medications used in the training environment have published detection times. Detection times are defined as the interval between the time at which the drug is administered and the time at which the observed urine (and plasma) concentrations in horses are below the harmonised European (European Horseracing Scientific Liaison Committee) Screening Limit or International Screening Limit.

It is important to consult the BHA list of <u>published</u> detection times and all of the associated notices and policies on the <u>Anti-Doping</u> page of the BHA website, which includes up-to-date detection times for medications given at specific doses. It should be noted that detection times are published based on a specific dose, route, dosing regime and product, and will be subject to variation when alternatives to these are used. These documents are updated periodically, so please make sure you are using the most up-to-date information.

Withdrawal period

Detection times are <u>not</u> the same as withdrawal periods. To establish a withdrawal period, extra time should be added to the detection time to provide an adequate safety margin. This safety margin should be determined by the treating veterinary surgeon, using their professional judgement, and should consider potential biological, pharmaceutical and pharmacological variation. This makes a discussion between a trainer and their veterinary surgeon essential when considering administration of any medication which is a prohibited substance on raceday. Carefully assessed and adequate time, specific to the particular administration, must always be allowed before running a horse that has been administered a prohibited substance. If a published detection time is not available, then such assessment is even more important.

Stand-down period

Please also be aware that a minimum mandatory stand-down period is **<u>not</u>** the same as a detection time. <u>Guidance</u> has been published regarding the use of intra-articular (joint) injections of corticosteroids. This also includes guidance on elective testing, which should be utilised wherever a trainer wishes to establish whether medication given for essential veterinary treatment has cleared from a horse's system before a race.

Equine welfare is of paramount importance and a trainer should assess the need, risk and consequences of administering or not administering any medication.

Medications must be used, stored and recorded in accordance with veterinary guidance and the <u>Rules of Racing</u>. These include all medication administrations and treatments when using anything that could contain a substance prohibited on raceday (termed "Treatment" in the Rules).

For the avoidance of doubt, any substance that is capable at any time of having an action and/or effect on one or more of the mammalian body systems is considered a Category B Prohibited Substance. The Prohibited List Code can be found <u>here</u>.

It is important that any treatment also complies with the regulations set out in law under the Veterinary Surgeons Act 1966 and guidance provided by the Royal College of Veterinary Surgeons (RCVS), particularly regarding the restriction of unqualified laypersons administering intravenous



injections or intramuscular injections. These are considered complex procedures that must only be carried out by a qualified veterinary surgeon or under their direct supervision by a veterinary nurse or veterinary student.

Reducing the risk of contamination

Contamination from medications should be controlled with yard medication management and policies, applicable to all staff on the yard, to reduce the risk of cross-contamination. Areas to consider are not limited to, but could include:

- Contamination from treated horses to untreated horses through the use of communal bridles and bits
- Contamination from treated horses to untreated horses via physical contact. For example, through stable bars or shared facilities such as horse walkers and horseboxes
- Contamination from staff handling treated and untreated horses in succession, e.g. when tacking up or medicating the horses
- Storage or preparation of medications near feed stuffs e.g. feed room and tack room including racing tack
- Sharing of feed mangers or non-effective cleaning of feed mangers post medication
- Administration of medication in the stabling environment particularly with medications in powder form
- Medication residue contaminating other medications in storage or administration syringes
- Medications being excreted in urine and faeces. This is particularly important with horses sharing turn out or any communal loose boxes/pens.

The following is a non-exhaustive list of examples of things you could consider:

- Using a dedicated area for administration of medication
- Ensuring the medication storage cabinet or room is always locked with only appointed members of staff having access
- Emptying and thoroughly decontaminating stabling, troughs and mangers following a course of medication or when a horse moves box
- Ensuring that the cleaning of stables is sufficiently thorough to remove anything that could contain a prohibited substance
- Ensuring that all staff are aware of the standards expected on the yard and are regularly reminded of such standards
- Displaying signage reminding staff and visitors of the standards expected and policies in place
- Implementing a checking procedure to ensure that the expected standards are being met
- Obtaining the veterinary histories of new equine arrivals into the yard.



Human medication, recreational drugs and feed stuffs

It is not just equine medication that can cause a positive sample. Substances that could trigger an AAF can be found in many everyday items of human food, drinks, over the counter treatments and medications as well as prescription medications from a GP.

There is also a risk of contamination due to staff (or even visitors') use of recreational drugs. It is imperative you ensure your staff are fully aware of such risks and what your policies are on the yard to reduce them.

The BHA <u>Table of Penalties</u> provides that the **lowest** sanction available (absent exceptional circumstances) for an AAF involving a substance such as cocaine, is a 2-year suspension of the Trainer's Licence, or a 2-year disqualification, suspended for 24 months, and a fine of £1,000.

Contamination from staff or visitor medication, and the consumption of food, drink and drugs should be controlled by a yard policy applicable to all staff on, and visitors to, the yard to reduce the risk of cross-contamination. Areas to consider include, but are not limited to:

- Implementing a policy to manage these risks and ensuring staff and visitors are aware of it and reminded of its importance regularly
- Being aware of potential contaminants being brought onto the yard e.g. staff prescription medication and over the counter medications such as topical treatments, tablets, powders, creams, aerosols and gels
- Ensuring any medication brought onto the yard is kept in a designated area, away from the stables and in a suitably secure manner
- Ensuring staff, wherever possible, take any medications or apply topical treatments **after** close contact with horses such as at the end of the day to reduce the risk of contamination. If this is not possible, ensuring all staff thoroughly wash their hands and/or wear gloves to ensure there is no trace of the medication present
- Restricting the consumption of food and drink on the yard with associated signage. This is particularly important regarding the consumption of food and drinks containing prohibited substances such as caffeine, which could trigger an AAF
- Implementing a hand washing procedure particularly on first entry to the yard, before and after eating and administration of medications and when handling new equine arrivals into the yard
- Implementing a suitable recreational drugs and alcohol testing and education policy. Staff should be regularly reminded that medications and or recreational drugs all have pharmacological effects and can be easily transferred from staff to equines, for example from hands, under fingernails or metabolites of substances excreted from sweat through skin or urine. An industry pilot of a drug and alcohol testing and education scheme is currently available to all trainers. The pilot is being led by the National Trainers Federation, National Association of Racing Staff and Thoroughbred Breeders' Association. For more information on this, please contact r.sage@racehorsetrainers.org.
- Ensuring food intended for human consumption isn't given to horses or stored close to equine feed stuffs or tack
- Providing single use disposable gloves that can be used by staff using medications or administering equine medications to horses on the yard
- Ensuring staff do not urinate outside of designated toilet facilities and never in a horse's stable



- Implementing checking procedures to ensure staff comply with the yard policies and procedures
- Displaying signage reminding staff and visitors of the standards expected and policies in place
- Ensuring staff and visitors understand the reasons for such policies and procedures and how important they are.

Equine Feed provision, suitability and storage

It is strongly recommended to purchase feed from reputable feed merchants, or direct from the manufacturer, to ensure the feed has been stored and transported in a suitable manner to prevent feed degrading or being contaminated in transit.

Feed compounds, straight feeds and supplements are supplied by many manufacturers across the world. You should ensure that you are aware of the ingredients of the feed/supplement prior to feeding and be sure that any combinations of feed/supplements do not contain levels of trace elements such as cobalt and arsenic, or nutraceuticals such as methylsulfonylmethane (MSM) that together could trigger an AAF, including through accumulation.

It is strongly recommended to use a feed or supplements supplied by a manufacturer accredited by the <u>BETA</u> NOPS Code. This provides assurances from the British Equestrian Trade Association to reduce the risk of naturally occurring prohibited substances found in the feed compounds and supplements and the raw / straight feeds.

BETA NOPS assured feed will carry the BETA NOPS logo (see below) as well as featuring on the <u>BETA</u> NOPS website. Feed with this assurance doesn't guarantee a complete removal of prohibited substances through either intentional or unintentional contamination, but there are rigorous processes to reduce this risk.



Contamination from feed / supplements should be managed by a yard policy applicable to all staff on the yard to reduce the risk of cross-contamination. Areas to consider include, but are not limited to:

- Securing of the feed storage for both bulk and preparation feed when not in use
- Regular thorough cleaning of feed mangers, feed barrows and scoops
- Appointing a member of staff to take responsibility for the storage and distribution of feed
- Ensuring no human or equine medication is stored, prepared or administered in or near to the feed storage / preparation area
- Washing hands thoroughly prior to preparing or distributing feed and/or wearing of suitable gloves
- Using a transparent chain of supply from growth, harvest, manufacture and delivery to ascertain the origin of the product
- Logging feed batch numbers and a small sample that can be used for follow up testing



- Not mixing feed containing medications with non-medication mixers
- Using a designated trough for medications
- Ensuring all staff are made fully aware of the yard policies, the reasons behind them, and are regularly reminded of them
- Displaying signage reminding staff and visitors of the standards expected and policies in place
- Implementing checking procedures to ensure policies and procedures are being adhered to.

Farmland and grazing

It is recommended that the trainer makes enquiries as to whether any sustainable farming incentives such as conservation headlands, conservation strips and buffer strips are being implemented on farmland adjacent to land used for grazing or hay production, where seed mixes may have been planted that potentially contain naturally occurring Prohibited Substances.

Contact

If you have any questions on anything discussed in this document, please contact: <u>anti-doping@britishhorseracing.com</u>.