

Reducing the risk

Contaminated Feedstuffs * Cross Contamination * Medication Management

Introduction

Under the BHA Rules of Racing, the Responsible Person – in most cases the trainer – **is strictly liable for any positive test**. Therefore, it is vital that you take all reasonable precautions to avoid any Adverse Analytical Finding (“positive test”).

In the event of a positive test, a trainer may avoid a fine if,

- the Prohibited Substance was not intentionally administered by the trainer or by any other person whether connected with the trainer in any way or not; and
- the Trainer had taken all reasonable precautions to avoid contravening the rule.

If you are unsure about whether the use of a product is permitted under the BHA Rules of Racing or you require further advice please contact the BHA Equine Health and Welfare Department at equine@britishhorseracing.com

This guidance is divided into three main sections dealing with contaminated feedstuffs, cross contamination and medication management. There are best practices which relate to all three areas and specific guidance on each area.

Part 1 : Contaminated Feedstuffs – Reducing the risk through reasonable precautions

Following the precautions set out below cannot guarantee that there will not be a positive test from a feed contamination because many of the substances which could cause a positive finding occur naturally in plants increasingly grown on a commercial basis.

Similarly, following these steps will not guarantee no fine being levied at an enquiry, particularly if the source of the prohibited substance is not established or the Disciplinary Panel believe there were other steps which could have been taken by the trainer.

However, following good practice should **reduce the risk** of a positive test and **form the basis of a defence at a BHA enquiry**.

Feed Management

Whether using a compound or a straight feed or a supplement chose a company accredited to the **BETA NOPS Code**. See www.beta-uk.org and search “BETA NOPS” for detailed information.

The British Equestrian Trade Association (BETA) has two assurance schemes designed to reduce the risk of naturally occurring prohibited substances (NOPS) in equine feeds. One is designed for manufacturers of compound feeds and the other is a sister scheme for raw materials and straight feeds. The principle risks are caffeine, theobromine and morphine.

The BETA NOPS logo that may be seen on the bags is:



Remember this is not just for feeds. It is also for supplements.

It should be noted that the use of the logo is optional but most feed supplied to trainers by companies who are BETA NOPS assured will carry the logo. It is wise to check the BETA website or with the company. The BETA NOPS scheme applies to a company, not individual products. Therefore if the company has any feed displaying the logo then, as long as there is no statement saying the feed is NOT suitable for competing horses/racehorses, the rest of their feed will be made to the NOPS standard. The list of contents should still be checked **and it does not mean that the product will not contain any prohibited substances**, either intentionally or through contamination, but indicates good practice by the trainer in using BETA NOPS assured products.

Trainers need to be aware that the BETA NOPS program does not screen for other prohibited on a raceday substances or prohibited at all times substances.

Feed management does not end with sourcing the feedstuff – it continues with yard practices – See below “Cross Contamination – Reducing the Risk”

Unaccredited feed and supplements

If using a feed or supplement which does not come from a BETA NOPS accredited company then as a minimum you should undertake a risk assess to reduce the risk of a positive test:

- Find out the chain of supply – what are the origins of the product?
- Ask if it is supplied by a grower or company which grows or has previously grown morphine poppies
- Ask what, if any, testing is carried out on the raw materials and finished batches
- What accreditation does the laboratory analysing the product have?
- Ask what other products, if any, are made on the production line
- Ask if the manufacturer also manufactures products containing prohibited at all times substances under BHA rules
- Ask how it is transported – again what is the risk of contamination from other crops
- Ask if the product is intended for racehorses
- What assurances can the grower, manufacturer, transporter or retailer give as to the processes involved?

Consider if there is an **alternative supply of the feed or supplement** which is accredited.

Supplements

Ensure that the provenance and ingredients of supplements is known and give consideration as to whether a batch of it can be tested.

On a risk management basis, a key theme in human sports person anti-doping practices is to assess the need and assess the risk, so in horseracing to assess if the horse needs the supplement, for instance, is it on veterinary advice? If the assessment indicates a need, then go on to assess the risk of using any particular product as above.

If a trainer cannot show that detailed investigations were carried out and that due diligence has been taken in ascertaining the suitability of a feed or supplement for horses subject to the BHA rules, then the trainer may be found not to have taken reasonable precautions in any disciplinary enquiry relating to a positive test.

Misleading Manufacturer Claims

There are often claims made on packaging that a feed or a supplement “does not contain any prohibited substances in accordance with Jockey Club Rules”. The Jockey Club no longer regulates British Horseracing and such references to approval by the Jockey Club or similar or indeed approval by racing authorities have no meaning. Just because a product states that it does not contain any prohibited substances this does not necessarily mean that this is the case.

Record keeping

It is best practice to keep the labels or delivery notes which state the batch numbers of the feed delivery, suppliers being under obligation to keep samples of the batches. This assists traceability if there is a positive test.

If possible keep samples of the feed upon delivery and keep for two months after the feed has been consumed in case of any future investigations. This may not always be practical in a yard with a lot of feed being used – **it is far more important to keep the batch numbers and a record of when the feed was fed (date to and from) and to which horses if the diet across the yard differs.**

Keep details of any correspondence with feed companies or other parties in relation to feed/ supplements where the investigation has been undertaken into the provenance of the product.

Race day

Rule (B) Schedule 7.1 of the Rules of Racing state that to be qualified to run a “horse must not have received any substance on the day of the race (whether by injection, orally or by any other method) other than normal feed and water offered by mouth until it has left racecourse property”. (This does not apply where the racecourse Veterinary Officer has given a special dispensation).

If the horse’s allocated racecourse stable appears dirty, ensure that the racecourse officials are alerted immediately and the stable not used.

Pasture land

Ensure that any turn out paddocks are checked for unknown plants or unfamiliar plants – if in doubt then be cautious and remove it.

PART 2 : CROSS CONTAMINATION – REDUCING THE RISK

As a first step you should inform and educate all staff on readily identifiable possible sources of cross contamination and give instruction on the yard's standards and procedures and ensure that staff with feeding or medication responsibilities are aware of your specific requirements relating to those duties.

Consider having a yard policy in relation to minimising/reducing the risk of cross-contamination.

The following points could form the basis of the policy alongside the **NTF's Reducing the Risk Poster**

- Do not allow the consumption of foods and drinks meant for human consumption in the feed room or stables.
- In particular ensure all staff are aware that coffee, chocolate and energy drinks contain prohibited substances.
- Require staff **to wash their hands thoroughly with soap and water immediately after treatment, and/or use single wear disposable gloves** whilst carrying out any treatment on themselves or a horse – make sure that there are suitable washing facilities and gloves available.
- Considering putting up instruction posters on handwashing available from the Health and Safety Executive (www.hse.gov.uk)
- **Advise staff not to urinate in stables at the yard or raceday stables** – highlight the very real risk of cross contamination this poses
- Empty and decontaminate stables, mangers and water troughs prior to the arrival of a new horse or a horse being moved from one box to another or at the end of a course of veterinary treatment. This should include removing all bedding.
- Find out the medication and treatment history of a horse to ascertain what treatment or medication it has had prior to arrival
- Ensure that any cleaning of stables, mangers and troughs removes encrusted dirt/food that may be a source of ongoing exposure to a contaminated substance. Ensure staff know the standards the yard expects as to thoroughness of cleaning.
- Never place the first aid box, materials or grooming kit in the feed store.
- Keep the feed store closed when not in use.
- Have feed containers with lids which are closed at all times when not in use.
- Clean feed mixing tools and use different mixing tools if medication is in a feed.
- Finish one bag of feed before starting another – do not mix bags of feed.

- If mixing feeds – such as preparing a mash – ensure that all the ingredients are either accredited or that investigations have been made of the suppliers as set out above.
- **Have checks in place so that someone is responsible for ensuring the best practice is being met.**
- Consider asking staff to declare any medications they are taking. Staff should be told this can be done in confidence and who they should advise (see below)

Employees on medication

If you gather information about prescribed medication being taken by staff the General Data Protection Regulations will apply as this is sensitive personal data. There are strict rules surrounding this and the grounds upon which data can be collected.

If any trainer is considering collecting such data then they should contact the NTF or other adviser to discuss the GDPR implications and requirements for processing sensitive personal data. One point to bear in mind is that in addition to needing a legitimate business interest which has to be balanced against the rights and freedoms of the individual employee, the business would need explicit informed consent from the employee which can be withdrawn at any time.

Further advice on handling sensitive personal data is available from the Information Commissioner's Office at www.ico.org.uk or the NTF.

It would be good practice to **have a policy in place with regard to human medication** and ensure that your employees are aware of cross contamination risks and best practices if they are on medication. The following bullet points could form the basis of a yard policy

- Human medication should be kept away from the stable yard and any other areas/items the horse may come into contact with. If it is essential that it is carried on the person for emergency purposes then it should be kept in its original packaging and in a zip lock bag or sealed Tupperware type box.
- Wherever possible human medication should be taken after any close contact with the horse rather than immediately before, e.g. at the end of the day rather than at the start of the day.
- If anyone is using topical medication, such as those containing ibuprofen or diclofenac (Voltoral gel) then particular care should be taken especially if they are used on part of the body that may come into contact with the horse, such as a bare arm.
- Require staff to wash their hands thoroughly with soap and water after taking any medication to ensure there is no residue left on their hands before handling horses or equipment

Visitors to the yard

You should ensure that visitors to the yard such as farriers, physios, vets, owners and other third parties are informed as to the yard's policies on minimising the risk of cross contamination and abide by them.

PART 3 : MEDICATION MANAGEMENT

In addition to the procedures for minimising the risk of cross-contamination, you should have in place a policy for medication management and ensure staff are instructed on the yard policies. The following may form the basis of a yard policy:

- Ensure all medication is recorded in accordance with BHA rules – this includes treatments such as joint injections, sedations, local anaesthetics
- Record the administration of all medication to all animals on the yard as required by the BHA Rules
- Have a procedure in place for confirming the identity of the horse being treated (this includes where the vet is treating a horse)
- Check withdrawal periods with the vet – check the withdrawal period for every treatment with each horse and discuss with the vet the various factors such might differ from horse to horse even if the treatment is the same
- Keep medications locked away – have a strict policy for logging out medicines and ensure excess medicines are not left on the yard
- Ensure staff take particular care when using powder forms of medication
- Keep the medicine cabinet clean – residue powder may contaminate other drugs
- If administering a medication orally, use a clean towel or cloth to wipe away any residue product from the horses lips
- Dispose of unused or expired medicines
- Dispose of used syringes and needles into sharps containers/biological waste as appropriate
- Be aware that some drugs can be recycled in urine or faeces (such as flunixin)*.
- Do not use homemade remedies.
- Consider if it is safe and practical to administer medication administered as an oral paste out of the stable, or in a separate treatment box
- Consider marking the stable door for any horse which is on medication to alert staff and visitors

As an example, Flunixin excreted in the urine may be ingested with bedding, risking prolonging the time taken to clear the drug away from the body thus increasing the risk of a positive test. You should discuss with your vet whether a drug presents a risk of recycling and seek advice either from

your vet or the BHA Equine Health and Welfare department as to best practice to reduce the risk in individual cases.

As noted in the bullet points above, it is also particularly important to discuss withdrawal times for a specific treatment to an individual horse since the advice may vary for particular horses even when the treatment is the same and, for instance, for treatment such as corticosteroids to joints the withdrawal time will take into account the amount of treatment being given, what other medication may be being given at the same time and any other factors individual to that horse

General

Yard Policies and Procedures

As part of your induction for new employees ensure they have explained to them the yard policy on avoiding contamination, cross contamination and medication management and that they are given any training necessary.

Depending on the size of the yard, the trainer and/or senior employees should oversee and check from time to time that the policies and procedures are being followed and if not, take appropriate action by way of education, improvement notices to staff or disciplinary warnings as appropriate.

Sources of further help and information:

National Trainers Federation

01488 71719 Dawn Bacchus

Email – d.bacchus@racehorsetrainers.org

British Horseracing Authority

Equine Health and Welfare Department

020 7152 0000 Amanda Piggot

Email – equine@britishhorseracing.com

British Equestrian Trade Association – BETA NOPS standard

www.beta-uk.org

Health and Safety Executive

www.hse.gov.uk