

## 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, you may avoid a fine or fall into the low category of penalty, if you can show that you had no knowledge of administration and reasonable precautions were taken. It is more nuanced than that but key points are the procedures you have in place, how you oversee that they are followed and in the case of therapeutic doses that veterinary advice has been followed. Particular care needs to be taken when feeding of supplements, knowing what those products contain and if they could give rise to a positive test.

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](mailto:equine@britishhorseracing.com)

This guidance is divided into three main sections dealing with contaminated feedstuffs, cross contamination and medication management.

The NTF has template policies :

- Reducing the risk of contamination from feedstuffs
- Reducing the risk of cross contamination – human medication and drugs
- Reducing the risk of cross contamination - equine medication policy

all of which can be found on the website and can be amended to suit your own business needs.

## **NTT Sporting Investigations yard assessment**

NTF members can access a discounted service from NTT Sporting Investigations. This is provided by Nathan Taylor, previously of the Police Counter Terrorism Command and BHA Integrity Team. For an all-inclusive price, Nathan provides:

A full survey of your training premises identifying areas of potential compromise in relation to cross contamination and biosecurity.

An on site consultation with key staff members in respect of best practice enabling you to improve onsite processes immediately.

Within five days of conducting the survey he will provide the yard with a comprehensive report highlighting any identified areas of potential compromise and a bespoke user friendly, anti - contamination positive sample prevention strategy.

Nathan has agreed to offer a 15% discount to NTF members which will be matched by the NTF, meaning a total discount of 30% (correct as at August 2023)

For more information visit [www.nttsportinginvestigations.com](http://www.nttsportinginvestigations.com)

Alternatively, contact:

Nathan Taylor

Email [Info@nttsportinginvestigations.com](mailto:Info@nttsportinginvestigations.com)

Phone 07462 530846

## 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 consider 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 choose a company accredited to the **BETA NOPS Code**. See [www.beta-uk.org](http://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 or 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 assessment 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**

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).

Where practicable the staff member(s) who travel the horses should inspect the allocated stables prior to the horse entering. There have been instances of stables being found to contain potential contaminants after the horse has gone into the stable. Once the horse has entered the stable, even for a minimal amount of time, it can become a difficult point to defend. The employees should request a clean stable be provided and if this happens, make sure your raceday staff report it back to you.

## **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.

### **Issues to discuss with your staff**

Put in place a "reducing the risk of cross contamination policy" – the NTF template is on our website and ensure your staff are trained on this.

Key areas are:

- 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.

Washing hands with soap and water is the most effective method of preventing incidents of cross contamination but there will be occasions when due to accessibility, it may not always be practicable. As a backup procedure, having hand wash available at stations around the yard would be beneficial.

- Considering putting up instruction posters on handwashing available from the Health and Safety Executive ([www.hse.gov.uk](http://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.
- 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.**

As trainer, you should find out the medication and treatment history of a horse to ascertain what treatment or medication it has had prior to arrival and keep records of that information.

### **Employees on medication**

Medication includes substances such as transdermal patches, syrups, injectable medications, all form of topical medications and inhalers (which can be excreted in the urine within 72 hours after use).

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](http://www.ico.org.uk) or the NTF.

### **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**

Put in place an “**Equine Medication Policy**” – the NTF template is on our website.

It is essential that all medication is recorded in accordance with BHA rules – this includes treatments such as joint injections, sedations, local anaesthetics

It is 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. For instance, a treatment such as corticosteroids to joints the withdrawal time will take into account the amount of treatment being given, any other medication may be being given at the same time and 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](mailto:d.bacchus@racehorsetrainers.org)

##### **British Horseracing Authority**

Equine Health and Welfare Department

020 7152 0000

Email – [equine@britishhorseracing.com](mailto:equine@britishhorseracing.com)

##### **British Equestrian Trade Association – BETA NOPS standard**

[www.beta-uk.org](http://www.beta-uk.org)

##### **Health and Safety Executive**

[www.hse.gov.uk](http://www.hse.gov.uk)