

Ref, Memo	NF	NF Comment
B.11	ARG	we don't agree with this proposal. It is a very complex system to implement. It does not contribute to the growth of sport, on the contrary, it will become almost impossible, especially in countries where there are not enough Fei races.
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B.11	ARG	We propose the following: Horse must have completed two CEI1* to be able to compete in CEI2* Horses must have completed two CEI2* to be able to compete in CEI3*. We believe that increasing the rest times as we proposed above gives the horse more time for its evolution
B.11	ARG	For Regional Championships, we agree, for Young Horse Championships we propose: Only two events CEI2* or below one of which must have been in combination with the nominated Athlete/Horse completed no more than two years prior to (and no later than) the deadline for Nominated Entries for the Championship or 60 days prior to the Championship (whichever comes first).
B.11	ARG	We propose the following:for the Young Rider/Junior and Championships: Three CEI2* events or higher, one event must have been as a combination with the nominated Athlete/Horse completed no more than two years prior to (and no later than) the deadline for Nominated Entries for the Championship or 60 days prior to the Championship (whichever comes first) and for the Senior Championships:  Five CEI 2* Events or higher (including a minimum of one CEI 3* for Senior 3* Championships) which must have been (i) the same or greater distance as the Championship (in a single-day event), and (ii) completed no more than two years prior to (and no later than) the deadline for Nominated Entries for the Championship or 60 days prior to the Championship (whichever comes first).
B.11	ARG	We don't agree with this proposal. Maintain the current rule.
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B.11	ARG	We agree with this rule, although the Elite rider must be recognized in some way, to encourage the sport and reward those who are professionals.
B.11	AUS	Agree with the principle that successful completions should be rewarded
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B.11	AUS	EA recommend maintaining the current rule as: Horses & Athletes who have accumulated a minimum of 240 km in a maximum of three events of 80km or higher in a 36 months period, can be granted an exemption. EA believe that this is a suitable novice qualification system, as has been in operation in Australia for some decades. However, EA are pleased to have exemptions retained in the rules.
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B.11	AUS	<p>EA cannot agree to the qualification rules, which we believe will seriously limit or stop FEI competition in Australia. The majority of endurance rides conducted in Australia are conducted under national rules, and the costs and distance in the country make it very difficult to conduct multiple FEI events.</p> <p>Therefore there are insufficient opportunities for athletes and horses to progress through the star rating, in the time allowed. The inclusion of these new qualifying rules will make it virtually impossible for Australia to retain any engagement with the FEI endurance competition.</p> <p>These rules therefore incentivise people to fly to other countries and ride leased horses with which they do not have strong connections or knowledge of. Any rule that disincentivises riders to ride their own horse that they train and know will result in a significant horse welfare risk. This is less the case in other equestrian disciplines but in endurance intimate knowledge of, and emotional connection with your horse is paramount to achieve good horsemanship and animal welfare outcomes.</p> <p>EA propose that either:</p> <p>A) national rides also be included in the main rules, while ensuring that athletes and horses are experienced</p> <p>OR</p> <p>B) countries with strong national endurance competitions but few FEI rides be allowed additional exemptions and dispensations, as per those exemptions provided for novice qualifying under 839.2</p> <p>For example:</p> <p>840.4.2 (a) Athletes and Horses must successfully complete five competitions of distance from 80-119km including a minimum of one CEI 1* Competition at a maximum speed of 18 km/hour or at the speed linked to their Completion Rate, whichever is lower.</p> <p>EA also propose that continued successful performance rides of 80-119 km (national and CEI 1*) be allowed in combination with CEI2* completion to qualify a rider to compete at the 3* level:</p> <p>840.6.1 Qualifying to compete at CEI 3*:</p> <p>Horses and Athletes must successfully complete a minimum of two CEI 2* Competitions within a rolling three-year period, the first at a speed cap that complies with Article 840.5.2(a), and the second at a speed cap that complies with Article 840.5.2(b). OR a minimum of one CEI 2* and three competitions of distance 80-119 km (CEI1* or CEN), complying with the speed cap.</p>
B.11	AUS	<p>EA disagree with the requirement for 2 combination qualifying rides, due to the difficulty and expense for Australian riders to take their own horses to other countries to compete. With the removal of elite status, this proposal decreases the options for our riders, and makes it much more difficult especially for young riders who may not have the funds for repeated international trips or to send their own horse overseas.</p>

Ref, Memo	NF	NF Comment
B.11	AUT	<p>As we already stated at previous steps of the consultation process, we are opposed to the proposed concept : completion rate, cap speed, CEI events qualification. We do not support it as it is far from the conception of the endurance sport from European and many other stakeholders perspectives.</p> <p>Endurance may be a real sport like it is practised in most cases, in the only possible way : fair, progressive from the access level to the highest standard (sport value must not be decrease),</p> <p>with a key combination of an educated rider and a well trained horse. The sport must be fair, simple to understand/control, having in mind that the competition may be practiced in most parts of the world.</p> <p>The proposed system is excessive, complicated, non realistic. Even within the memo and the rules it is complicated to understand, so it would be very difficult/impossible to apply, not respected and so not fair and ineffective. It would place endurance in a counter productive situation, forcing the ones (large majority) who are currently respecting the rules to change due to incorrect behaviours of the few who are not respecting the rules... Again, to tackle the drifts we may first apply strongly the sport regulation (based on the current one + some updates) and apply stronger sanctions for any case of cheating/doping/corruption.</p> <p>Any other changes would be useless as the core of the problem may not be reached.</p> <p>We believe that Endurance is a competition and should remain a competitive sport. Horse discipline with the biggest amount of veterinary controls and in most cases high level of horse caring, which is where focus should be stressed on making sure Officials are properly trained and can work in conditions allowing them to be effective. The number of kilometers asked for the qualification process of a horse is excessive and damageable in terms of horse welfare. The proposal of 3 CEI1* after the novice qualification is an example of the failures of the proposal. Please refer to our proposal much more progressive from the novice qualification to the highest levels.</p> <p>Speed cap concept would be inadequate. It is not taking in account the location, terrain, weather which from one show to another may evolve critically. A same speed may be the winner's speed by one hilly event and really low for a more flat one.</p> <p>As it is average speed cap it will not tackle the excessive speeds and horses stopping or walking just before to cross the line in order to decrease their speed data. It is also forgetting that with a worldwide approach most of CEI organizers do not have automatic timekeeping systems to help elaborate the result. It would marginalize the practice of Endurance in different areas with a negative effect either on development and on top sport. Completion rate proposal, cannot be implemented at this stage. It does not differentiate the</p> <p>type of eliminations which would be required in case of potential use of this tool in the future. compulsory. Using athlete examples as Jean Philippe Frances or Alex Luque, any system like this that when applied would limit their participations even if they are respected athletes by their results and behaviors. By consequence we suggest to study more into details in the coming seasons how it could be positive asset, if it can be ... In order to settle a more progressive competition pathway which is with the correct application of the rules and a stronger sanctions system the only way to build a sustainable future for the discipline of endurance, we recommend to put in place the following concept :By proposing this we are aware of the need to adjust the qualification system to help the worldwide balance and growth of the discipline. By no means the FEI ETC proposal for qualification referring : cap speed, completion rate, competition levels, number of rides... will find our support</p>
B.11	AUT	<p>EEF WG position:</p> <p>We support the riders qualification proposal, the combination ride but not the horses qualification proposal.</p> <p>New Elite status as extra championships requirement.</p> <p>Reasoning :</p> <p>We are aware that the current elite status may evolve, nevertheless as we discussed from last winter, we would be in favor of modifying it but not to make it honorary.</p> <p>We suggest to use it as an additional requirement to participate to the championships, for all riders willing to compete in a championship. Taking in account that depending of the part of Europe and of the world, the access to the international competition may be +/- challenging we recommend to decrease from 10 to 5 the number of successful 160km rides. Horse qualification proposal is inadequate and excessive.</p>
B.11	AUT	<p>Young Horse Championships requiring five 1* events to be completed makes it unrealistic that any Horse will be available to compete in this Championship.</p> <p>Timing and heart rate system In order to stop discussions and suspicions, we insist that FEI may :</p> <ul style="list-style-type: none"> <li>- label and closely control timing and heart rate systems used on international events.</li> <li>- control itself all championships with an FEI system, totally independent from any involved endurance stakeholders.</li> </ul>
B.11	BEL	<p>Belgium wants to maintain the current rule.</p> <p>"Horses &amp; Athletes who have accumulated a minimum of 240 km in a maximum of three events of 80km or higher in a 36 months period, can be granted an exemption".</p>

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B.11	BEL	Belgium ok with concerning athletes. Concerning horses, the current rule is enough.
B.11	BEL	Belgium recommends decreasing the number of CEI3* to obtain the Elite Status (10>7 by example) and to oblige all participants for a World Championship (not continental) to be Elite. But the definition of an elite athlete needs to be clarified!
B.11	BEL	Belgium disagrees completely. This ETC proposal has been already rejected by the participating NF during the 2019 Sport forum (April, Lausanne). This ETC proposal has been massively rejected (70%) by the Endurance Community in a questioner conducted by Tarek Taher (rider representative in the ETC).  Belgium proposes: Novice Qualification - 2 x CEN 40 k - 2 x CEN 60 k - 2 x CEN 80 k CEI to Championship - CEI 1* = 100 k (1 x) - CEI 2* = 120 k (1 x) - CEI3* = 140 k (1 x) - CEI4* = 160 k (1 x)  These proposals have a constant progression of 20 k steps. These proposals are simple and increase the level of experience of horses and riders. These proposals don't increase costs for riders, owners and organizers
B.11	BRA	Qualification though we agree on a stricter qualification for WCHs we believe that qualifying through the different categories should be 2 x CEI 1* instead of 3 x 1*competitions and not be linked to the newly suggested speed cap system. The Speedcap system is confusing for both riders and Organizers and only gives room for confusion. On top of it the riders don't have a clue against who they are competing.
B.11	BRN	<ul style="list-style-type: none"> <li>▪ We disagree this proposal and recommend maintaining the Current Endurance Rules for Novice Qualification to Championships.</li> <li>▪ We disagree with the latest rules proposed for Qualifications from CEI 1* to Championships as it goes against the competitive spirit of Endurance events.</li> <li>▪ We recommend modifying the current rule for Novice Qualification and Exemption of Novice Qualification with the following suggestions, <ul style="list-style-type: none"> <li>✓ The Athlete will be granted the exemption only if he has successfully completed a minimum of 240 km in Competitions over 80 km or more in the three years prior to the request.</li> <li>✓ FEI ER Art. 816.1.4 For 8 years old Horses and older, dispensation of art. 816.1.2 and 816.1.3 can be granted the exemption only if (i) it is eight years or older at the time of the request, and (ii) in the three years prior to the request it has successfully completed a minimum of 240 km in Competitions over distances of 80 km, including at least one competition of 80km or more at the age of eight or older.</li> </ul> </li> <li>▪ We also recommend to cancel the Young Horse Championships for 7 years old Horses. The welfare of the young horse is put under distress in an open speed environment.</li> </ul>
B.11	BRN	Elite Athlete Status will not result in automatic qualification for any Championships, we recommend keeping the current rule because the Elite Athlete Status is considered as a reward of excellence for FEI Endurance riders. Rules are meant to nurture rather than destroy motivation. Hence, the Elite Athlete Status should result in automatic qualification for any championships.

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B.11	BUL	<p>Bulgarian Equestrian Federation would like to make one comment about Qualification System for Championships.</p> <p>We agree that the "fast track" which allows athletes and horses to compete at Championship is not acceptable any more. But our understanding is that most of the problems are coming from the "big" nations with a lot of horses and athletes.</p> <p>The immediate implementation of the new qualification system will reflect on the small nations with limited horses and athletes.</p> <p>Theoretically the new qualification system could limit participation of a horse who has completed European Championship in 2019 from participation at World championship in 2020, which is not acceptable.</p> <p>..</p> <p>Our proposal is the Qualification system for Championships to be approved with Endurance rules 2020, but to be implemented in 2021.</p> <p>This will give to the athletes, trainer and national federations period of one year to adapt their strategies for qualification for championships.</p> <p>We believe that our proposal is fair enough as it serves the interest of our sport globally.</p>
B.11	CAN	<p>We agree with the proposal, except;</p> <p>That the two 40-79 km novice events be allowed to be done as 4 year old.</p> <p>And that "80-90 km (in one day)" be changed to "80-90 km (in one day, or two day)".</p> <p>And for National event we recommend that the rest period start at the end of the event to allow horses to compete in back to back 40 km, 80 km and other combinations not to exceed 160 km over the event.</p> <p>Is the FEI going to provide excel spread sheets for organizers and official to monitor the speeds during the events? And will the FEI Entry system provide speed cap information?</p>
B.11	CHI	<p>Speed regulation for racehorses finished according to the following table for each lap:</p> <p>Lower average of completion at 25% 14 km / hr  Average higher completion at 25%, but less than 50% 16 km / hr  Average higher completion at 50%, but less than 66% 18 km / hr  Average higher than or equal to 66% No speed limit</p> <p>If the established speed limit is exceeded, the binomial is rated FTQ-SP (Speed).</p> <p>Is difficult to implement and control administratively. We consider it appropriate, as long as the same protocols are formulated for all by the Fei regarding control and administration.</p>
B.11	CHI	<p>The elite rider classification no longer serves to directly classify championships. Rider and horse must classify together.</p> <p>We agree.</p>
B.11	CRC	<p>We agree that completion rates are a clear picture of the history of a rider and horse. For those of us who have such few FEI rides we would like for national events to count only if: these events are approved by the NF, have less than 25 horses and where there is at least 1 FEI official and 1 FEI Vet on the panel and where results are public and transparent.</p>
B.11	CRC	<p>We agree that horse welfare is paramount in our sport and will accept proposals that will help in the process. The rule as written is just too difficult to understand. We understand the concept but only because it has been explained in person to us. Some of the questions we have are: does this statement refer to national rides as well? Who is responsible for managing the completion rates of horses and riders. Where will this information be available? Will FEI be proving OCs with a timing system that will allow OCs to control this information at every event, after completion of every phase? Will speed caps be enforced at Championships.</p>
B.11	CRC	<p>We believe the qualification process to qualify for CEI events is too much. To pass from CEI 1* to CEI 2* - since novice is still in place this means that horses and riders have already done 2. Two successfully completed CEI 1* should be enough to meet criteria to advance to CEI2*.</p>

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B.11	CRC	<p>CRC Comments and questions: Requirement of 3 events for a 1* Regional Championship is too many. One is enough for the 1* level. How will the qualification process for WEC 2020 be affected with the implementation of the proposal? Some people will qualify with the old rules and some people with the new rules? We believe the current qualification process should be maintained for WEC 2020 qualification in order to make it fair to all.</p>
B.11	CRC	<p>What records are being referred to in this article. If it is National records that the NFs will have to upload then our point of allowing national rides with less than 25 horses and with some FEI officials count for qualifications and to break negative streaks makes even more sense.</p>

Ref, Memo	NF	NF Comment
B.11	CRO	<p>NF Croatia is not in favour of the proposal to change Art. 840 regarding qualification for CEI 2*, namely successful completion of three CEI1* Competitions. This change would disqualify less wealthy and less developed federations to even attempt to achieve all FEI qualifications due to high costs. Also, having 3 CEI1* Competitions as precondition to reaching the next level would invalidate the national qualification level, where the riders and horses gain first and most important experience and knowledge. NF Croatia does not agree with the qualification criteria for Championship for young horses. Namely, according to this proposal, considering when the young horse can start competing at specific level of the Competition, it would mean that the young horse is expected to achieve 7 (5 FEI + 2 national) CEI1* competitions in one year + CEI2* competition (the Championship). We do not consider that this helps the welfare of the horse and would suggest qualification to change to not more than 3 CEI1* qualification Competitions.</p> <p>Regarding the Completion Rate system and Speed linked to Completion Rate we would propose that FEI provides to NFs software that would enable national competitions to be included as well into Completion Rate System and designated speed cap. Also, how will speed cap be determined for the athletes and horses competing for the first time at FEI competition, if there is no link to completion rate at national levels.</p> <p>NF Croatia also supports proposition that qualification at national level are 2x 40, 60 and 80 km, so slower increase of distance is again introduced at national level, which would benefit the horses as well as prepare the athletes better for international level competitions.</p> <p>As a general note NF Croatia would like to point out that next year we have World Championship and Athletes and Horses are preparing for long period for this event. Therefore, we find that it would not be in line with rules to apply possible changes of the Qualification for Championship to the World Championship in 2020. Our suggestion is that, in case the new rules are passed and applicable as of 1 January 2020, qualification criteria according to the current rules applies to World Championship 2020.</p>
B.11	ECU	<ul style="list-style-type: none"> <li><input type="checkbox"/> This rule detracts from the competition.</li> <li><input type="checkbox"/> Limits the speed of participation by groups, which makes competing less interesting. Before the start, there are couples that because of the maximum speed, they have limited winning options. This turns an Endurance race into an organized parade of horses and riders, in which if a couple speeds up is removed from the competition.</li> </ul>
B.11	ECU	<ul style="list-style-type: none"> <li><input type="checkbox"/> This rule extends the process of running FEI 1 * to 2 *, making it more expensive to move forward, longer and less motivating.</li> <li><input type="checkbox"/> Instead of being only one race of 80 km race, with the new rules has to be three races. This requires 3 times more effort than the current process.</li> <li><input type="checkbox"/> In countries with few FEI races like ours, this reduces the few possibilities we have of competing outside our country. In addition to the fact that horses must run more, which can also be harmful.</li> </ul>

Ref, Memo	NF	NF Comment
B.11	EEF	<p>As we already stated at previous steps of the consultation process, we are opposed to the proposed concept : completion rate, cap speed, CEI events qualification. We do not support it as it is far from the conception of the endurance sport from European and many other stakeholders perspectives.</p> <p>Endurance may be a real sport like it is practised in most cases, in the only possible way : fair, progressive from the access level to the highest standard (sport value must not decrease), with a key combination of an educated rider and a well trained horse. The sport must be fair, simple to understand/control, having in mind that the competition may be practiced in most parts of the world.</p> <p>The proposed system is excessive, complicated, non realistic. Even within the memo and the rules it is complicated to understand, so it would be very difficult/impossible to apply, not respected and so not fair and ineffective. It would place endurance in a counter productive situation, forcing the ones (large majority) who are currently respecting the rules to change due to incorrect behaviours of the few who are not respecting the rules... Again, to tackle the drifts we may first apply strongly the sport regulation (based on the current one + some updates) and apply stronger sanctions for any case of cheating/doping/corruption.</p> <p>Any other changes would be useless as the core of the problem may not be reached.</p> <p>We believe that Endurance is a competition and should remain a competitive sport. Horse discipline with the biggest amount of veterinary controls and in most cases high level of horse caring, which is where focus should be stressed on making sure Officials are properly trained and can work in conditions allowing them to be effective. The number of kilometers asked for the qualification process of a horse is excessive and damageable in terms of horse welfare. The proposal of 3 CEI1* after the novice qualification is an example of the failures of the proposal. Please refer to our proposal much more progressive from the novice qualification to the highest levels.</p> <p>Speed cap concept would be inadequate. It is not taking in account the location, terrain, weather which from one show to another may evolve critically. A same speed may be the winner's speed by one hilly event and really low for a more flat one.</p> <p>As it is average speed cap it will not tackle the excessive speeds and horses stopping or walking just before to cross the line in order to decrease their speed data. It is also forgetting that with a worldwide approach most of CEI organizers do not have automatic timekeeping systems to help elaborate the result. It would marginalize the practice of Endurance in different areas with a negative effect either on development and on top sport. Completion rate proposal, cannot be implemented at this stage. It does not differentiate the type of eliminations which would be required in case of potential use of this tool in the future. compulsory. Using athlete examples as Jean Philippe Frances or Alex Luque, any system like this that when applied would limit their participations even if they are respected athletes by their results and behaviors. By consequence we suggest to study more into details in the coming seasons how it could be positive asset, if it can be ... In order to settle a more progressive competition pathway which is with the correct application of the rules and a stronger sanctions system the only way to build a sustainable future for the discipline of endurance, we recommend to put in place the following concept :By proposing this we are aware of the need to adjust the qualification system to help the worldwide balance and growth of the discipline. By no means the FEI ETC proposal for qualification referring : cap speed, completion rate, competition levels, number of rides... will find our support</p>
B.11	EEF	<p>EEF WG position:</p> <p>We support the riders qualification proposal, the combination ride but not the horses qualification proposal.</p> <p>New Elite status as extra championships requirement.</p> <p>Reasoning :</p> <p>We are aware that the current elite status may evolve, nevertheless as we discussed from last winter, we would be in favor of modifying it but not to make it honorary.</p> <p>We suggest to use it as an additional requirement to participate to the championships, for all riders willing to compete in a championship. Taking in account that depending of the part of Europe and of the world, the access to the international competition may be +/- challenging we recommend to decrease from 10 to 5 the number of successful 160km rides. Horse qualification proposal is inadequate and excessive.</p>
B.11	EEF	<p>Young Horse Championships requiring five 1* events to be completed makes it unrealistic that any Horse will be available to compete in this Championship.</p> <p>Timing and heart rate system In order to stop discussions and suspicions, we insist that FEI may :</p> <ul style="list-style-type: none"> <li>- label and closely control timing and heart rate systems used on international events.</li> <li>- control itself all championships with an FEI system, totally independent from any involved endurance stakeholders.</li> </ul>

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B.11	ESP	<p>We oppose this proposal and concept entirely. o We oppose to the application of such a complicated system that will make the entire competition and rules extremely difficult to understand not only for experts and Officials who will have to control them, but to all Athletes and those interested in Endurance. This system is poorly explained even in the MEMO and we see extreme difficulty in it's application worldwide, even more so taking into account that the majority of CEI events in the world do not have automatic timekeeping systems to help elaborate the results and stay on top of the competition. These speed caps simply do not take into account different type of terrains and regions and risk in marginalizing the practice of Endurance in different areas. We believe that Endurance is a competition and should remain a competitive sport, the Horse discipline with the highest amount of veterinary control and care for the Horse, which is where focus should be stressed on making sure Officials are properly trained and can work in conditions allowing them to be effective.</p> <p>Any system that when applied would limit the participation of top recognized Athletes such as Jean-Philippe Frances or Alex Luque is a system that has not been properly studied and thought of from theory to implementation. We believe the application of this system is dangerous for the discipline and it's growth and should be scratched.</p> <p>We believe that the objective of increasing the education of horsemanship for Athletes is good and further scaling the system will be good for the discipline, while remaining conscious of making sure the competition can be practiced everywhere and by anyone while having fun and enjoying the practice of horse riding, which this system clearly does not allow. As an example of scaling, we believe Athletes should add more rides under their belt at the lower level by adding two 60km rides to the national Qualification (and 2x 40km and 2x 80km) and increasing the 1* length from 80 to 90-100km.</p> <p>We believe that the amount of rides and competitions Horses have to do in order to reach a Championship and maintain itself at Championship "ready" status is enormous, which is very much contrary to the concepts that the ETC and FEI have been explaining they were after in protecting horse welfare or the MOOCP system. The reality of this system and the elimination of Elite status is that Horses, in the real world, will do a lot more rides, be under a lot more stress, and rest a lot less, with all the increased risk factors the FEI has already told us about. We do not think this whole system has been carefully thought and studied because of this and feels like a last minute drop-in.</p> <p>After taking a look the use of Elite status in the last few Championships, we note that it is rare for a Horse to have issues with Elite riders that have not ridden that Horse before, and generally injuries are related to Horses that had done already combination rides with the Rider, especially Horses that were pushed during a season to do many rides to qualify with many different riders (as mentioned above). We think that the Elite status should be reinforced instead of removed, as it does not cause welfare issues and may in fact be preventing them.</p> <p>Finally we are concerned about the amount of rides (5 1*) required to participate in a YH Championship. It seems like it will reduce the number of participants to 0, and if that's the intention, should remove the Championship itself.</p>
B.11	GBR	<ul style="list-style-type: none"> <li><input type="checkbox"/> National 80kms should be able to be used instead of FEI 1*s – this would give more options to qualify</li> <li><input type="checkbox"/> Too many 1*s required</li> <li><input type="checkbox"/> Too complicated to understand and enforce</li> <li><input type="checkbox"/> Should be more national rides required before reaching FEI level in the first place – it is too easy to get to advanced</li> <li><input type="checkbox"/> Will make FEI only a sport for rich owners of multiple horses, and may mean the UK will not be able to field a team</li> <li><input type="checkbox"/> Speed caps are a good idea, but should be relative to the course. Some feel all rides should have a speed cap</li> </ul>
B.11	GER	Blinkers and visors should not be allowed at all
B.11	GER	<p>Leave the Novice Qualifications as they are, they are working.</p> <p>Star Qualification: as proposed or based on the proposals suggested by TEIRA with the following additional comments:</p> <p>2 consecutive CEI* to qualify for CEI**. This is a good idea and is equivalent to 66 % or more. In addition, the first of the two consecutive rides for a rider and/or horse should have a capped speed of maximum 18 kph</p> <p>2 consecutive CEI **. In addition, the first of the two consecutive rides for a rider and/or horse should have a capped speed of maximum 18 kph</p> <p>First CEI*** with a maximum speed of up to 18 kph</p> <p>The present proposal with Ride Caps and percentage completion rates means that the horses have to do too many rides to qualify. This is not in the interest of horse welfare and is too costly for the participants. This proposal is difficult for the OCs, NFs and FEI to manage. The proposals from TEIRA are much simpler and can be managed much more easily, especially for smaller countries with fewer rides per annum. It would mean the horses and riders would not have to travel so far to qualify.</p>

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B.11	GER	<p>Junior Championships: 3 CEI** or higher for horses and athletes Senior Championships: 3 CEI** and 2 CEI*** for horses and athletes (2 of these rides as a combination for Seniors and Juniors)</p> <p>Qualification Young Horse Championship: 2 consecutive CEI* and one CEI** (as a combination!) The proposed suggestion means that a 7 y.o. horse has to do too many rides in one season to qualify too much for a young horse</p>
B.11	IRL	<p>This proposal has been dismissed out of hand. It is proposed that the old rule be retained with the rider having to do one additional ride in combination for Championships.</p>
B.11	IRL	As above comments.
B.11	IRL	Entries will not be accepted after the close of the definite entry list. Substitute horses must be on the definite entry list.
B.11	ITA	<p>In line with the EEF Endurance WG, and as they already stated at previous steps of the consultation process, we are opposed to the proposed concept: completion rate, cap speed, CEI events qualification. We do not support it as it is far from the concept of the Endurance sport from European and many other stakeholders perspectives. Endurance may be a real sport like it is practised in most cases, in the only possible way: fair, progressive from the access level to the highest standard (sport value must not decrease), with a key combination of an educated rider and a well-trained horse. The sport must be fair, simple to understand/control, taking in mind that the competition may be practiced in most parts of the world.</p> <p>The proposed system is excessive, complicated and non-realistic. Even within the memo and the rules it is complicated to understand, so it would be very difficult/impossible to apply, not respected and so not fair and ineffective.</p> <p>It would place Endurance in a counterproductive situation, forcing the ones (large majority) who are currently respecting the rules to change due to the incorrect behaviour of the few who are not respecting the rules ... Again, to tackle the drifts we may first apply strongly the sport regulation (based on the current one + some updates) and apply stronger sanctions for any case of cheating/doping/corruption.</p> <p>Any other changes would be useless as the core of the problem may not be reached.</p> <p>We believe that Endurance is a competition and should remain a competitive sport. Horse discipline with the biggest number of veterinary controls and, in most cases, high level of horse caring, which is where focus should be stressed on making sure Officials are properly trained and can work in conditions allowing them to be effective.</p> <p>The speed cap concept would be inadequate. It is not taking in account the location, terrain, weather which from one show to another may evolve critically. A same speed may be the winner's speed by one hilly event and really low for a flatter one. As it is average speed cap it will not tackle the excessive speeds and horses stopping or walking just before to cross the line in order to decrease their speed data. It is also forgetting that with a worldwide approach most of CEI organizers do not have automatic timekeeping systems to help elaborate the result. It would marginalise the practice of Endurance in different areas with a negative effect either on development and on top sport.</p> <p>The Completion rate proposal, cannot be implemented at this stage. It does not differentiate the type of eliminations which would be required in case of potential use of this tool in the future. compulsory. Using athlete examples as Jean Philippe Frances or Alex Luque, any system like this that when applied would limit their participations even if they are respected athletes by their results and behaviour. By consequence we suggest studying more in detail in the coming seasons how it could become a positive asset, if this can be the case ...</p> <p>In order to settle a more progressive competition pathway which is with the correct application of the rules and a stronger sanctions system the only way to build a sustainable future for the discipline of endurance, we recommend to put in place the following concept. this proposal is coming from a large consultation process of all groups of endurance stakeholders in Europe which are aware of the need to evolve to help the worldwide balance and growth of their discipline. By no means the FEI ETC proposal for qualification referring: cap speed, completion rate, competition levels, number of rides..</p>
B.11	ITA	<p>We are aware that the current elite status may evolve, nevertheless as we discussed from last winter, we would be in favour of modifying it but not to make it honorary. We suggest using it as an additional requirement to participate in the championships, for all riders willing to compete in a championship. Taking in account that depending on the part of Europe and of the world, the access to the international competition may be +/- challenging we recommend decreasing from 10 to 5 the number of successful 160km rides.</p> <p>We support the rider's qualification proposal, the combination ride but not the horses qualification proposal which is inadequate and excessive.</p>
B.11	ITA	Young Horse Championships requiring five 1 * events to be completed makes it highly unrealistic that any Horse will be available to compete in this Championship.
B.11	JPN	should be "entered" in order to be legit.

Ref, Memo	NF	NF Comment
B.11	JPN	We basically recommend and support this proposal. However, it is concerned in losing competitiveness of the sport if adapting this new system.
B.11	JPN	What happens if a combination earns Certificate of Capability for World Endurance Championship, scheduled in 2020, by 31 December 2019? Would that CoC be retained?
B.11	KSA	We recommend maintaining the current rule as: Horses & Athletes who have accumulated a minimum of 240 km in a maximum of three events of 80km or higher in a 36 months period, can be granted an exemption
B.11	KSA	We recommend maintaining the current rule
B.11	KSA	We recommend keeping the current rule because - There must be a rewarding system for the Elite riders compare to other disciplines, for example, in showjumping Elite rider receive a special invitation to big events even with a free entry and travel costs - Rewarding Elite riders will encourage another rider to reach this status which we believe it will promote the horse welfare. - It can't be that most of the proposed rules are just restriction and sanction but has to be rewarding as well.
B.11	KSA	<p>We don't agree with this proposal because:</p> <ol style="list-style-type: none"> <li>1. It does not serve sports and does not contribute to its development, rather it will hinder the current development and growth in the Endurance discipline.</li> <li>2. it has been rejected by the endurance community (70% of the society) Where it proved through the questioner conduct By Mr. Tareq Taher (Rider representative in Endurance technical committee)</li> <li>3. was rejected by the practicing countries during 2019 FEI Sport forum.</li> <li>4. Increase the time for the riders and horses to qualify that can be extended for years, especially in countries where there are not enough FEI events</li> <li>5. This system will be very expensive for the riders, owners and organizing committees as they have to do many events to finish the qualification.</li> <li>6. Too short a notice to implement in the field as a proper system needs to be devised including all the required changes&gt; (example: IT system to do all the calculations).</li> <li>7. In many countries, they don't have Electronic Timing System but they used the Manual system which will be more difficult to record the speed of the combination, and more difficult for the official to control it.</li> <li>8. This system requires Advance Electronic Timing System which will increase the cost for NF/OC</li> <li>9. The proposed system is quite ambiguous as it allows the riders/horses compete with 16/h in Novice qualifications and at the same time preventing it to do a higher level of competitions with a lesser speed( in case of horse/rider with less than 25% completion rate where the speed limit is 14/h)</li> </ol> <p>We recommend keeping the current rule until proper system is studied and tested including the endurance community.</p>
B.11	LBN	We recommend maintaining the current rule as: Horses & Athletes who have accumulated a minimum of 240 km in a maximum of three events of 80km or higher in a 36 months period, can be granted an exemption
B.11	LBN	We recommend maintaining the current rule
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B.11	LBY	We recommend maintaining the current rule as: Horses & Athletes who have accumulated a minimum of 240 km in a maximum of three events of 80km or higher in a 36 months period, can be granted an exemption
B.11	LBY	We recommend maintaining the current rule
B.11	LBY	We recommend keeping the current rule because - There must be a rewarding system for the Elite riders compare to other disciplines, for example, in showjumping Elite rider receive a special invitation to big events even with a free entry and travel costs - Rewarding Elite riders will encourage another rider to reach this status which we believe it will promote the horse welfare. - It can't be that most of the proposed rules are just restriction and sanction but has to be rewarding as well.

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B.11	LBY	<p>We don't agree with this proposal because:</p> <ol style="list-style-type: none"> <li>1. It does not serve sports and does not contribute to its development, rather it will hinder the current development and growth in the Endurance discipline.</li> <li>2. it has been rejected by the endurance community (70% of the society) Where it proved through the questioner conduct By Mr. Tareq Taher (Rider representative in Endurance technical committee)</li> <li>3. was rejected by the practicing countries during 2019 FEI Sport forum.</li> <li>4. Increase the time for the riders and horses to qualify that can be extended for years, especially in countries where there are not enough FEI events</li> <li>5. This system will be very expensive for the riders, owners and organizing committees as they have to do many events to finish the qualification.</li> <li>6. Too short a notice to implement in the field as a proper system needs to be devised including all the required changes&gt; (example: IT system to do all the calculations).</li> <li>7. In many countries, they don't have Electronic Timing System but they used the Manual system which will be more difficult to record the speed of the combination, and more difficult for the official to control it.</li> <li>8. This system requires Advance Electronic Timing System which will increase the cost for NF/OC</li> <li>9. The proposed system is quite ambiguous as it allows the riders/horses compete with 16/h in Novice qualifications and at the same time preventing it to do a higher level of competitions with a lesser speed( in case of horse/rider with less than 25% completion rate where the speed limit is 14/h)</li> </ol> <p>We recommend keeping the current rule until proper system is studied and tested including the endurance community.</p>
B.11	NAM	agree
B.11	NAM	agree
B.11	NAM	however countries with less rides then will not be able to meet the bar.
B.11	NAM	• Don't agree – suggestion to consider 15 rides, as Elite status shows that you are a good rider. What motivation will there be to achieve Elite status? • This is a more achievable goal than it is to pay for three or more times to go overseas and ride rides to qualify. This gives Group IX also a chance to qualify.
B.11	NAM	<p>We don't agree with this proposal because:</p> <ol style="list-style-type: none"> <li>1. Regions/countries with very little events will take ages to qualify. Resting periods have been increased.</li> <li>2. We must find a way to ensure the delicate situation in our smaller NF's – whilst the sport needed to have a good review, it will be unfortunate to completely stop the sport for us.</li> <li>3. 120 is only one loop more than 80.</li> <li>4. Suggest that you consider adding rides to the Novice Phase.</li> <li>5. Rule making should be in such a way to still encourage growth in smaller NF's.</li> </ol>
B.11	NED	<p>We don't agree with this rule. During the EEF meeting there have been made several proposals for qualification from CEI1* to Championships. We go for proposal number two from the EEF meeting: 2x CEN 40km, 2x CEN 60km, 2x CEN 80km, 1x CEI1* 100km, 1x CEI2* 120km, 1x CEI3* 160km.</p>
B.11	NED	We don't support this rule. We go for the proposal from the EEF meeting.
B.11	NOR	<p>In principle, we do not disagree with the rule change, in terms of controlled speed and more experience before climbing up different levels, it is good horse welfare. However, for Norway and many other small countries, with few if any FEI rides a year and with a long / expensive travel to Europe (where the FEI rides go) only to qualify for next level will be very expensive and time consuming.</p> <p>Our proposal is: From CEI 1* to CEI 2* - 2 x CEI 1*, the first ride with speed cap of max 18 km/h From CEI 2* to CEI 3* - 2 x CEI 2*, the first ride with speed cap of max 18 km/h</p> <p>Regarding the Completion Rate, we don't want this now, mostly since we don't know how this should be handled / controlled. Especially since this is to be used on national rides as well. (if we have understood this correctly).</p> <p>We assume that the FEI will have a database where all data will be recorded and calculated, but what about the national rides, who will record and calculate those, will that be the National Federation's responsibility, and how will FEI be able to control that?</p> <p>Our recommendation is that the controlled speed as proposed above regarding qualification from one lever to another are fine, however no completion rate now. We believe that it must be clarified who will register / keep track of national rides and how can FEI be sure that this is done correctly before we change the rule.</p>

Ref, Memo	NF	NF Comment
B.11	NOR	We agree that FEI elite status should be removed, and that the rider/horse must have several rides as a combination. But for Senior there is a significant increase in the number of rides for the horse and it will be much more difficult to qualify. Our proposal; Horse - 1 x CEI 3* plus 3 x CEI 2* or higher Athlests - 2 x CEI 3* plus 3 x CEI 2* or higher Cominations - 1 x CEI2* and 1 x CEI3*
B.11	NZL	Whilst we are comfortable with the proposed speed caps during the qualifying stages, the requirement to qualify multiple rides at each level before progressing will make CEI events untenable in New Zealand and a number of other countries. The costs involved in putting on CEI events, particularly in a country like New Zealand with a small base of competitors and long travel times for people to get to competitions (and particularly the difficulty in getting between the North and South Island) means that there may be only two to three events at 1* or 2* each year that you could attend and only one or two at 3*. Alternative proposals (TEIRC) requiring consecutive completions are also untenable when the opportunities to compete are so few and we have completion rates in the range of 40-85% at most events. Nearly all current CEI competitors in New Zealand would return to riding just CEN and it would not be feasible to continue with CEI competitions for the couple of riders who may wish to remain FEI registered in the hopes of representing New Zealand at international level. If the costs of putting on CEI event (the fees paid to FEI, the costs of having the number of veterinarians required, and the requirement for foreign vets and officials at certain levels) were significantly reduced, or were subsidised in some instances – then it may be possible to move part-way towards what is proposed. Alternatively, if CEN rides of 80 km or longer were able to count towards qualification (for example if the vet(s) and judges at the event were FEI qualified) then that may make the proposed criteria feasible. As the proposed rules stand, we would not vote for them. We strongly recommend splitting this rule change out from the others so that some or most of the others have a better chance of being agreed upon in November.
B.11	NZL	We strongly support the transition provisions if the new qualifying criteria are introduced.
B.11	OMA	NF support to maintain the current rule
B.11	OMA	We are supporting to keep the current rule. Compare to other discipline, there should be rewarding system for Elite riders and it will encourage another rider to attain this dream level and it will definitely improve the horse welfare.
B.11	OMA	We are not agreeing with this proposal 1. It does not support sports and does not improve its development and it will drawing back the current development and growth in the Endurance . 2. it has been rejected by the endurance community. 3. Already rejected by the practicing countries during 2019 FEI Sport forum. 4. It will increase more time for the riders and horses to qualify that can be extended for years, especially in countries where there are not enough FEI events 5. It will be very expensive for the riders, owners and organizing committees as they have to do many events to finish the qualification. 6. Very short notice to implement in the field 8. This system is quite uncertain as it allows the riders/horses compete with 16/h in Novice qualifications and at the same time preventing it to do a higher level of competitions with a lesser speed( in case of horse/rider with less than 25% completion rate where the speed limit is 14/h) We are supporting to keep the current rule until an adequate system is studied and tested with endurance community.
B.11	POR	No, we don't agree. Doesn't make sense and we don't understand how this will improve this sport
B.11	POR	AGREE
B.11	POR	No, we don't agree. Doesn't make sense and we don't understand how this will improve this sport
B.11	POR	AGREE

Ref, Memo	NF	NF Comment
B.11	POR	<p>Competing at CEI1* once qualified for that level</p> <p>a) Athletes and horses must successfully complete three CEI1* competitions at a maximum speed of 18Km/hour or at a speed linked to their Completion Rate, whichever is lower.</p> <p>We don't agree. It adds nothing to animal welfare, rather on the contrary once it increases the number of Kms that the horse has to run, to get to the next stage. There is no longer competition in CEI1* which, in small countries like Portugal can take to the lack of interest in this sport and contributes to the end of the endurance discipline. This qualification process is very expensive. The beginning of the qualification process must be carried out by the NF's</p> <p>b) The speed cap for any subsequent CEI1* will be determined by the Completion Rate of the Athlete/Horse</p> <p>We do not agree. It's absurd</p> <p>Competing at CEI2* once qualified for that level:</p> <p>a) Athletes and horses must successfully complete one CEI2* at a maximum speed of 18Km/hour or at a speed linked to their Completion Rate, whichever is lower.</p> <p>We don't agree for the same reasons than mention previously.</p> <p>b) The speed cap for any subsequent CEI2* will be determined by the Completion Rate of the Athlete/Horse</p> <p>We do not agree. It's absurd</p> <p>Competing at CEI3* once qualified for that level:</p> <p>a) If the Athlete and horse have not successfully complete a CEI2* together as a combination within three years of the date of the CEI3 competition they wish to participate in:</p> <p>(i) They must successfully complete one CEI3 at a maximum speed of 18Km/hour or at a speed linked to their Completion Rate, whichever is lower; and</p> <p>(ii) Any subsequent CEI3* will be subject to a speed cap based on the Completion Rate of the Athlete/Horse.</p> <p>Following what was mention previous we don't agree. A horse to do a CEI3* (160 kms) must have done already 600 Kms of competitions which doesn't fit with the horse's welfare.</p>
B.11	POR	AGREE
B.11	RSA	<p>Elite Riders:</p> <p>What is the use of Elite riders if they are not exempt from qualifying for World Champs</p> <p>Athletes from SA will be unable to particiapte in WC if they have to qualify overseas.</p> <p>The funding is not there.</p>
B.11	RSA	<p>Qualification from 1* to Championships:</p> <p>The extra requirements to qualify a horse are going to make the costs of riding very expensive and take longer than is needed.</p> <p>Keep requirements as they are.</p>
B.11	RUS	WE RECOMMEND KEEPING THE CURRENT RULE
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Ref, Memo	NF	NF Comment
B.11	RUS	<p>WE ARE NOT AGREE WITH THIS PROPOSAL BECAUSE:</p> <ol style="list-style-type: none"> <li>1. IT DOES NOT SERVE SPORTS AND DOES NOT CONTRIBUTE TO ITS DEVELOPMENT, RATHER IT WILL HINDER THE CURRENT DEVELOPMENT AND GROWTH IN THE ENDURANCE DISCIPLINE.</li> <li>2. IT HAS BEEN REJECTED BY THE ENDURANCE COMMUNITY (70% OF THE SOCIETY) WHERE IT PROVED THROUGH THE QUESTIONER CONDUCT BY MR. TAREQ TAHER (RIDER REPRESENTATIVE IN ENDURANCE TECHNICAL COMMITTEE)</li> <li>3. was rejected by the practicing countries during 2019 FEI Sport forum.</li> <li>4. Increase the time for the riders and horses to qualify that can be extended for years, especially in countries where there are not enough FEI events</li> <li>5. This system will be very expensive for the riders, owners and organizing committees as they have to do many events to finish the qualification.</li> <li>6. Too short a notice to implement in the field as a proper system needs to be devised including all the required changes&gt; (example: IT system to do all the calculations).</li> <li>7. In many countries, they don't have Electronic Timing System but they used the Manual system which will be more difficult to record the speed of the combination, and more difficult for the official to control it.</li> <li>8. This system requires Advance Electronic Timing System which will increase the cost for NF/OC</li> <li>9. The proposed system is quite ambiguous as it allows the riders/horses compete with 16/h in Novice qualifications and at the same time preventing it to do a higher level of competitions with a lesser speed( in case of horse/rider with less than 25% completion rate where the speed limit is 14/h)</li> </ol> <p>We recommend keeping the current rule until proper system is studied and tested including the endurance community.</p>
B.11	SLO	Maintaining the current rule.
B.11	SLO	Maintaining the current rule. EWith change you will just stop normal riders and give profesional riders more power!
B.11	SLO	Again, why should be profesional riders granted? All riders should be the same.
B.11	SLO	To complicated, again you will punish normal (non profesional) riders!
B.11	SUD	<p>We recommend maintaining the current rule as:</p> <p>Horses &amp; Athletes who have accumulated a minimum of 240 km in a maximum of three events of 80km or higher in a 36 months period, can be granted an exemption</p>
B.11	SUD	We recommend maintaining the current rule
B.11	SUD	<p>We recommend keeping the current rule because</p> <ul style="list-style-type: none"> <li>- There must be a rewarding system for the Elite riders compare to other disciplines, for example, in showjumping Elite rider receive a special invitation to big events even with a free entry and travel costs</li> <li>- Rewarding Elite riders will encourage another rider to reach this status which we believe it will promote the horse welfare.</li> <li>- It can't be that most of the proposed rules are just restriction and sanction but has to be rewarding as well.</li> </ul>
B.11	SUD	<p>We don't agree with this proposal because:</p> <ol style="list-style-type: none"> <li>1. It does not serve sports and does not contribute to its development, rather it will hinder the current development and growth in the Endurance discipline.</li> <li>2. it has been rejected by the endurance community (70% of the society) Where it proved through the questioner conduct By Mr. Tareq Taher (Rider representative in Endurance technical committee)</li> <li>3. was rejected by the practicing countries during 2019 FEI Sport forum.</li> <li>4. Increase the time for the riders and horses to qualify that can be extended for years, especially in countries where there are not enough FEI events</li> <li>5. This system will be very expensive for the riders, owners and organizing committees as they have to do many events to finish the qualification.</li> <li>6. Too short a notice to implement in the field as a proper system needs to be devised including all the required changes&gt; (example: IT system to do all the calculations).</li> <li>7. In many countries, they don't have Electronic Timing System but they used the Manual system which will be more difficult to record the speed of the combination, and more difficult for the official to control it.</li> <li>8. This system requires Advance Electronic Timing System which will increase the cost for NF/OC</li> <li>9. The proposed system is quite ambiguous as it allows the riders/horses compete with 16/h in Novice qualifications and at the same time preventing it to do a higher level of competitions with a lesser speed( in case of horse/rider with less than 25% completion rate where the speed limit is 14/h)</li> </ol> <p>We recommend keeping the current rule until proper system is studied and tested including the endurance community.</p>

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B.11	SWE	We refer to, and fully support the proposal written by the EEF Endurance working group (B.11)
B.11	SWE	We refer to, and fully support the proposal written by the EEF Endurance working group
B.11	UAE	We recommend maintaining the current rule as: Horses & Athletes who have accumulated a minimum of 240 km in a maximum of three events of 80km or higher in a 36 months period, can be granted an exemption
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B.11	UAE	We recommend keeping the current rule because - There must be a rewarding system for the Elite riders compare to other disciplines, for example, in showjumping Elite rider receive a special invitation to big events even with a free entry and travel costs - Rewarding Elite riders will encourage another rider to reach this status which we believe it will promote the horse welfare. - It can't be that most of the proposed rules are just restriction and sanction but has to be rewarding as well.

Ref, Memo	NF	NF Comment
B.11	UAE	<p>We don't agree with this proposal because:</p> <ol style="list-style-type: none"> <li>1. It does not serve sports and does not contribute to its development, rather it will hinder the current development and growth in the Endurance discipline.</li> <li>2. it has been rejected by the endurance community (70% of the society) Where it proved through the questioner conduct By Mr. Tareq Taher (Rider representative in Endurance technical committee)</li> <li>3. was rejected by the practicing countries during 2019 FEI Sport forum.</li> <li>4. Increase the time for the riders and horses to qualify that can be extended for years, especially in countries where there are not enough FEI events</li> <li>5. This system will be very expensive for the riders, owners and organizing committees as they have to do many events to finish the qualification.</li> <li>6. Too short a notice to implement in the field as a proper system needs to be devised including all the required changes&gt; (example: IT system to do all the calculations).</li> <li>7. In many countries, they don't have Electronic Timing System but they used the Manual system which will be more difficult to record the speed of the combination, and more difficult for the official to control it.</li> <li>8. This system requires Advance Electronic Timing System which will increase the cost for NF/OC</li> <li>9. The proposed system is quite ambiguous as it allows the riders/horses compete with 16/h in Novice qualifications and at the same time preventing it to do a higher level of competitions with a lesser speed( in case of horse/rider with less than 25% completion rate where the speed limit is 14/h)</li> </ol> <p>We recommend keeping the current rule until proper system is studied and tested including the endurance community.</p>
B.11	URU	<p>In line with what we expressed in the previous paragraph - that we do not agree with the speed caps- we neither agree with this article. We believe that starting a competition with a certain number of starters and with different speed caps, apart from being confusing does not contribute at all to the interest of the competition itself.</p>
B.11	URU	<p>We think that the proposed system is very long and cumbersome and that in the end, it will end up threatening the welfare of the horse, which is what we want to preserve. Currently, most of the trainers and the riders do not compete with their horses immediately after the rest period ends in order to preserve their welfare but they compete every two or three months to give them the appropriate rest. With this proposed system that would require three (3) CEIs 1 * to be able to move to 2 * level it would only promote that a rider or a trainer would make his/her horses compete as many times as possible in order to reach the next category. For example, if nowadays the average for a horse is to compete three or four times per year, this change would encourage the participation in at least twice the number of competitions in order to move to the next category.</p>
B.11	URU	<p>The same opinion as for the previous article applies.</p>
B.11	URU	<p>In addition to all of the above, we consider that this extremely long qualification system will limit or restrict the possibilities of many countries to attend to the Championships. Worth to mention that many countries do not have enough FEI events in a year in order to be able to fulfil these requirements. In fact, reaching a Seniors Championship it would imply at least, and in the best case, to participate in eight (8) events (CEIs) while in the present the participation is in four (4) events. We believe that this measure seriously undermines the development and the growth of the sport. Hereunder we present a list of the countries that due to the low number of events they usually organize, we think that could have difficulties: Austria, Belgium, Czech Republic, The Netherlands, Sweden, Denmark, Costa Rica, Guatemala, Ecuador, Australia, New Zealand.</p>
B.11	USA	<p>USEF Comments:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Levels of Competition. Approve in concept however both rules refer to either "all levels of competition" or "at any level of competition." Clarification is needed as to whether the completion rate and speed cap proposals must also be calculated for FEI athletes or horses competing at the CN level. If CNs are not used to determine a completion rate or speed cap, it is recommended that "Star" be added to both rules to clearly state that all calculations are based on FEI competitions only.</li> <li><input type="checkbox"/> Practicality of Implementation. Additionally, it will be very difficult and prohibitively expensive for many OCs and / or NFs to provide timing systems to ensure real time electronic tracking of speeds during a competition or event. It is requested for the FEI to provide assistance with obtaining timing systems and further information on how to implement the speed caps for competition purposes if a timing system is unavailable. Maybe as an alternative the FEI only require this to be implemented at Events that have recorded average speeds in excess of a stated KPH.</li> </ul>

Ref, Memo	NF	NF Comment
B.11	USA	<p>USEF Comments:</p> <p>Approve in concept however the USEF has two concerns, specifically around qualification for 2*, and recommend what is seen as simple solutions.</p> <ol style="list-style-type: none"> <li>1. The financial constraints placed upon athletes and owners to meet the additional star level requirements and</li> <li>2. The fiscal and human resource constraints placed on OCs due to the proposed requirements for the number and level of officials required.</li> </ol> <p>The proposed solution for the FEI to consider would be additional options for qualifying at the Novice and 1* levels. It is recommended to allow the option for athletes or horses to compete in back to back 40km competitions. It is also recommended for athletes or horses to have the option of competing back to back 1* competitions during the same event. To ensure horse welfare, the horse would be required to present for a second horse inspection prior to being allowed to start the second 1* competition. It would be up to the NFs to determine the parameters for allowing a horse to compete in back to back 40km competitions at the novice level.</p>
B.11	USA	<p>USEF Comment:</p> <p>Approve as presented however clarification is needed on how the proposed qualifications will affect the 2020 Championship. The reason being is there are many athletes and horses who have met the qualifications based upon the current Rules. It would be wrong, and in some parts of the world easily challenged (legally) to change the Qualification system half way through the Qualification Period.</p>