



## Equine Anti-Doping Rules Online Session Have your say - We Need your Input

*"Updated on 13 August 2020 to include the comments of the USA NF which were inadvertently not included in the first version of the document"*

While some changes to the EADCMR will be mandatory to ensure that the FEI remains WADA compliant, the FEI has scope in some areas to adapt the rules to reflect the specificities of equestrian sport. Have your say and let us know what you think about some of the questions and proposed changes below.

You can send your feedback directly by email to **Áine Power**, FEI Deputy Legal Director and **Mikael Rentsch**, FEI Legal Director.

### CONTAMINATION RELATED QUESTIONS

Refer to the [Contamination section](#) for additional background information on the questions below.

Q	<p><b>In reference to "Other Forms of Contamination":</b></p> <p><b>Do you want to allow more flexibility for contamination cases, if proven, and even if the Athlete bears some Fault/Negligence for the positive case?</b></p> <p><b>Or do you want to keep, as a minimum, one-half of the standard sanction (i.e. 1 year for Banned Substance cases)?</b></p> <p><b>Of course if the Athlete is at No Fault/Negligence, there is <u>no ineligibility period</u> imposed.</b></p>
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### FEEDBACK

<b>USA NF</b>	<p>We would want to see more flexibility.</p> <ul style="list-style-type: none"> <li>• Tracing the source of contamination can be challenging and very time consuming.</li> <li>• It is clear that contaminations are happening – many recent examples.</li> <li>• There are too many areas where contamination may occur even to the most diligent. For example, traveling in Europe it is necessary to layover over at stables on route to a competition. Many times it is late in the evening upon arrival and impossible to ensure that the stables have been properly cleaned and de-contaminated. In addition, it is not practical for an athlete to send their own hay. For example, U.S. athletes are not permitted to take hay to Mexico (for a Nations Cup the U.S. are required to compete at to qualify for the Finals) and must rely on the suppliers at the event with whom there is no relationship and from whom no guarantees can be received.</li> <li>• The reality of traveling with horses especially as the sport globalizes needs to be considered when discussing the actual ability to minimize</li> </ul>
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	<p>contaminations risks. There are too many scenarios where there are risks that are near impossible to control and overcome.</p> <ul style="list-style-type: none"> <li>• Being diligent about supplements is one thing but suggestions that hay can be "batch tested" are completely unrealistic.</li> </ul> <p>We would also like to see discussions relating to when a horse can return to competition once "contamination" is proven.</p> <p>If it is a supplement that is contaminated the nature of the supplement should be taken into context as to whether its use is contrary to or violates the spirit of the rules for fair play; if the supplement is intended to or promoted to 'calm the horse', if the supplement is intended to provide stamina, speed, etc. (endurance).</p>
<b>ITA NF</b>	<p>FISE, as NF, agrees to allow more flexibility for contamination cases, if proven, even if the Athlete bears some Fault/Negligence for the positive case. In suspected cases of contamination it does not seem fair that the temporary suspension is imposed pending trial.</p>
<b>GER NF</b>	<p>According to our understanding, the current rules already do allow for high flexibility (see Art. 10.5.1.2 – contaminated products) in imposing sanctions. As a matter of principle, the rules to act depending on fault/negligence are right. We do not think that we should impose no sanction at all as long as there is fault/negligence.</p> <p>The second question is not clear to us as in our understanding, the sanction can be a reprimand according to EADCMR Article 10.5.1.2</p>
<b>ESP NF</b>	<p>It will be a good idea to allow more flexibility for contamination cases if proven ...</p>
<b>GBR NF</b>	<p>We would support allowing a greater degree of flexibility for contamination cases with the Athlete being subject to sanction where it is proved that he/she bears a degree of Fault or Negligence.</p> <p>In addition, we would support the Dutch Federation's view that imposing a period of ineligibility on both the rider and the horse in proven cases would help protect the welfare of the horse and act as a greater incentive to riders to ensure that they adopt the highest level of care to prevent inadvertent doping.</p>
<b>DEN NF</b>	<p>With regards to this we are in line with Germany : we do find sanctions should be imposed if evidence of fault/negligence is established</p>
<b>BEL NF</b>	<p>As long as there is proven fault/negligence, there needs to be a sanction.</p>
<b>SUI NF</b>	<p>What is the difference between No Fault/Negligence and Significant</p> <p>Yes, we would welcome more flexibility as it is often very difficult to distinguish between Fault/Negligence. This concept should be revisited. A standard sanction does not accommodate the variety of cases.</p>
<b>AUT NF</b>	<p>According to our understanding, the current rules already do allow for high flexibility (see Art. 10.5.1.2 – contaminated products) in imposing sanctions.</p>

	<p>As a matter of principle, the rules to act depending on fault/negligence are right. We do not think that we should impose no sanction at all as long as there is fault/negligence.</p> <p>The second question is not clear to us as in our understanding, the sanction can be a reprimand according to EADCMR Article 10.5.1.2</p>
<b>IRI NF</b>	We believe one half of the standard sanction should remain
<b>NED NF</b>	<p>We advocate to allow more flexibility for contamination cases and integrate such concept in the Equine Anti-Doping Rules.</p> <p>In any proven case we suggest that the horse always gets suspended. This is not only good for the welfare of the horse (well-needed rest) but it also forces the person(s) responsible to keep a good horse medication logbook (and report the use of medication that is prohibited out of competition).</p>
<b>EST NF</b>	We think that more flexibility could be allowed.
<b>MEX NF</b>	Allow more flexibility for contamination cases.
<b>RUS NF</b>	In case of proven contamination, the responsibility of the athlete should be removed, however, the practice of accumulating cases could be introduced. Sanctions could be applied if 3 cases of detection of contamination with prohibited substances would occur.
<b>SWE NF</b>	Yes we would like to allow more flexibility for contamination cases if proven, and even if the Athlete bears some Fault/Negligence for the positive case?
<b>IRL NF</b>	Keep, as a minimum one-half of the standard sanction.
<b>IJRC</b>	<p>1A Yes, if it is not performance enhancing contamination should have flexibility. The riders feels that there is a high risk of accidental contamination on the way to and at many competitions. However the IJRC would like to underline that it stands firmly against doping.</p> <p>We do agree there should be standardised operating procedures that the equine community and the FEI can employ to risk mitigate.</p> <p>In the case of contamination, a clearer definition of what is meant by contamination would be much appreciated– not only based on detection techniques and theoretical procedures as shown. In any case, we would appreciate if the FEI were to determine more screening limits for more molecules. It is also necessary to set these screening limits for molecules classified as banned substances. Experience has shown that in many cases of contamination, banned substances are present. The classic case is poppy contamination.</p> <p>WADA CODE &amp; INTERNATIONAL STANDARDS 2021; SUMMARY OF SIGNIFICANT CHANGES page 12 , point 29 states:          “Rather than modify the rule in the current Code related to contaminated products, a better approach is to consider raising the reporting limits for those prohibited substances which are known contaminants”.</p> <p>Thus we think is only logical to apply that same principle on horses, considering that horse cannot be guarded 24/7 and interrogated on everything they ate.</p>

	<p>As above we support the changes in the new in the WADA code 2021. The introduction of a reprimand in case of non significant faults/negligence from the Athlete (art.10.6). We would like to see this reflected in our rules.</p> <p>In the case of inadvertent doping (Banned Substance, i.e. Sparteine/Lupinus; Synefrine; Colchicine /autumn crocus) due to contamination, when a court recognises the athlete's innocence, and when the quantity of the substance detected has not enhanced performance (in fact in some cases substances can be damaging: Oripavine), the athlete should not suffer any negative consequences: neither ineligibility, nor monetary sanctions, nor loss of prizes. The norm could be limited to FEI events and exclude the Olympics.</p> <p>We would like to underline that the concept of proportionality of the sanction accepted by CAS (CAS sentence 2010/A/2268) and EU law is an important consideration especially when talking about ineligibility. This notion also need be defined and understood in the context of person responsible (PR) as defined by the FEI and especially when these person are minors. It will be highly appreciated to have a definition with examples.</p> <p>At the present time the athletes feel insecure, in that anti-doping rules are highly demanding and not in line with current stable security at FEI events , there is a high risk of accidental contamination and we do agree that the equine community and FEI can improve how to mitigate the risk. Reference to cases available.</p>
<b>Yuri Yagi (JPN)</b>	<p>I don't feel more flexibility is necessary in contamination cases. Contamination cases should be dealt with as an issue of No (significant) Fault/Negligence as ruled in the current EADCMR and WADA code 2021. If contamination was occurred and there is no fault/negligence of PR, ineligibility period can be eliminated (less than one-half). The one-half rule distinguishes No significant Fault/Negligence and No Fault/Negligence.</p>
<b>Dr Teigen Bond</b>	<p>No, no extra flexibility – keep the ½ minimum standard sanction. As athletes working with animals who have no say over their feeding regimen, all athletes must be responsible for what happens to and around their equine partners.</p>
<b>British Equestrian Trade Association</b>	<p>No Feedback</p>

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**In reference to new measures in the WADA Code 2021:**

- Supplements can be **contaminated** and may be the cause of inadvertent doping.
- New reporting limits for **prohibited substances often** found in supplements will be shared with Labs.
- This means Athletes who cannot say which supplement caused the positive test are better protected **but** they must still prove they mitigated the risk and undertook **thorough research of any supplement product before use.**

**Do you want to expand this concept in the Equine Anti-Doping Rules (to review the reporting limits for prohibited substances often found in supplements and to establish more Threshold Substances for naturally occurring substances)?\***

*\*Note: The FEI had already worked on reporting limits but also liaises with WADA to share best practices/experience.*

## FEEDBACK

<p><b>USA NF</b></p>	<p><b>US Team Veterinarian Comments</b></p> <ul style="list-style-type: none"> <li>• More thresholds would definitely be appreciated.</li> <li>• I am interested in the “incidence” of ATF’s in Equestrian sport. This should be tracked and the statistics shared before this is pursued.</li> <li>• Realistically, it would be very challenging - both from a logistical and budgetary standpoint - to successfully execute analyzing each sample, particularly without having our own lab.</li> </ul> <p><b>USEF DRUGS &amp; MEDICATION DEPARTMENT COMMENT</b></p> <p>The use of Atypical Findings (ATF) is problematic for a laboratory as it includes an additional designation for a finding. The action level should be what the action level is and laboratories should not be required to identify different levels associated with potentially different sources of administration. However, the determination of a potential violation should rest with the FEI.</p> <p>The FEI has previously relied on a small group of experts to review findings generated by the laboratories prior to the determination of whether to allege a positive finding. This group consisted of a pharmacologist, a treating veterinarian, an analytical chemist, and a regulatory veterinarian. Previously known as the Medication Advisory Group (MAG), this group obviously had various perspectives and was very effective in reviewing positive findings, especially those that were less than straightforward.</p> <p>We encourage the FEI to reconstitute the MAG which could appropriately deal with the topic of Atypical Findings.</p>
<p><b>ITA NF</b></p>	<p>FISE agrees that the FEI collaborates with the Laboratories and the FEI Group of Lists to identify the relevant stakeholders in order to identify the appropriate reporting levels.</p> <p>The above to ensure that the contaminants of the supplements have threshold levels, substantially as is the case for acetyl salicylic. Furthermore, the Thresholds must be established so as to avoid positivity for contaminations whose levels of the molecules found correspond to dosages that in fact would have no clinical and, therefore, sporting effect.</p>
<p><b>GER NF</b></p>	<p>In principle: Yes, this concept should be expanded in the EADRs, but if a substance is found, the Person Responsible must be informed even if the concentration of the substance is below the threshold. For the welfare of the horse, the PR must be enabled to stop the contamination.</p> <p>In addition to protecting the athletes from inadvertent doping, ensuring the welfare of the horse and a level playing field has to stay paramount when reporting limits / thresholds are implemented.</p>
<p><b>ESP NF</b></p>	<p>Yes, we understand that it would be better to expand this concept t EADR</p>
<p><b>GBR NF</b></p>	<p>Yes we would support the expansion of thresholds for naturally occurring substances.</p>

<b>DEN NF</b>	Yes, the measures should be implementing. However, minding the challenges with lack of research/evidence of minimum blood concentrations to influence the performance of a horse of a number of substances, the welfare of the horse and a level playing field should always be paramount in deciding on thresholds/measures.
<b>BEL NF</b>	Yes, we support the fact to expand this concept in the EADR's
<b>SUI NF</b>	Yes
<b>AUT NF</b>	<p>Our opinion is: Yes, this concept should be expanded in the EADRs, but if a substance is found, the Person Responsible must be informed even if the concentration of the substance is below the threshold. For the welfare of the horse, the PR must be enabled to stop the contamination.</p> <p>In addition to protecting the athletes from inadvertent doping, ensuring the welfare of the horse and a level playing field has to stay paramount when reporting limits / thresholds are implemented.</p>
<b>IRI NF</b>	Yes, we do. We believe this measure could substantially help our athletes
<b>NED NF</b>	<p>We think it is still difficult to determine the screening limit for concentration of substances due to lack of good scientific research. We only know of a small number of substances where the minimum of blood concentration that is needed to be effective is established. With unnatural substances it is easier to determine. Also the fact remains that it is still possible that contamination was caused through no fault or action of the persons responsible. In that case always take in account at the history of the rider. We encourage to do more research to find threshold values for contaminants that are often found.</p> <p>We agree with the suggestion to expand the Elective Testing Substances List, this provides the persons responsible for the horse with more clarity and allows them to take preventive measures.</p> <p>We encourage the FEI to expand their Out-of-Competition Testing program for banned. With hair testing the FEI should include the hair root to determine DNA and a to specify the timeframe of administration (in case of use of medication).</p>
<b>EST NF</b>	Yes, this concept should be expanded in the EADRs.
<b>MEX NF</b>	Yes, expand the concept in the EAD Rules. The establishing of more Threshold is imperative.
<b>RUS NF</b>	The use of supplements is becoming more and more popular. The responsibility for their purity lies with the manufacturer, who should more honestly and in detail declare the content of their product. We support the idea of expanding the number and quality of thresholds.
<b>SWE NF</b>	Yes, Apply "Feed Residue Limits" like international racing (IFHA).
<b>IRL NF</b>	Yes, this concept should be expanded, reviewing the limits and establishing more Threshold Substances.

<p><b>IJRC</b></p>	<p>Yes. It would be good to look for performance enhancing substances and have the threshold close to where they are performance enhancing.</p> <p>The IJRC support raising the reporting limits for those prohibited substances which are known contaminants.</p> <p>The IJRC feels that the FEI should extend the recommendation for the risk of contamination to FEI Event organizers. Many of the contamination cases occurs at the show ground or during travel. For the athletes is really difficult and unfair to prove were the contamination came from when the show's hay or boxes are not his own nor handled with the same care and attention. The IJRC would much appreciate if FEI Event organizers are held to the same standard and rules as the riders, provide NOPS certificate or else riders cannot be held responsible and have to have the options to opt out of buy hay from shows.</p> <p>As we said above: an athlete who is not only innocent, but whose horse has been contaminated with a quantity of a substance that is not performance enhancing, and in certain cases is actually damaging to the horse (Oripavine), must not suffer any consequences whatsoever – neither of ineligibility, nor financial nor or loss of earnings.</p>
<p><b>Yuri Yagi (JPN)</b></p>	<p>I think the concept can be applied to the EADCMR, because sometimes it's too heavy burden for individual athletes (PRs) to prove the connection between supplements they used and positive finding of doping test.</p> <p>Even if the concept is applied, the athletes must still prove they mitigated the risk by themselves. Therefore, application of this concept doesn't mean facilitation of supplement usage.</p>
<p><b>Dr Teigen Bond</b></p>	<p>Yes, I think the concept should be expanded into the Equine Anti-Doping rules. This allows a bit more flexibility for athletes to not be at fault for a labelled ad regulated supplement having unlabelled ingredients.</p>
<p><b>British Equestrian Trade Association</b></p>	<p>Further to the submission already made on the EPSL revisions, BETA (the British Equestrian Trade Association) has always lobbied for the use of reporting limits for certain prohibited substances found in equine feeding stuffs, including forages, complete and complementary feeds (which also includes so-called supplements). We would therefore support the expansion of the principle of establishing more threshold substances for naturally occurring prohibited substances found in feed as a result of accidental contamination.</p> <p>In addition we would support all equine feeding stuffs being the treated in the same way due to the risk of contamination occurring from both feeds and supplements. The paper presented at the 9th edition of the European Equine Health and Nutrition Congress in 2019 by Dr Ludovic Bailly-Chourberry, Director of LCH France "Nutritional causes of positive doping testing" clearly illustrates this point. In a total of 3590 samples tested (2112 Feed and 1470 Supplements) roughly 4 times more positives resulted from feed compared to supplements.</p> <p>Feed stuffs for horses whether they be feeds or supplements often share the same ingredient supply chains, making the risk of contamination arguably similar. To single out "supplements" therefore sets a risky precedent of focusing rider and responsible individuals' attention on a part of the feed chain which is actually of lower risk of contamination.</p>

**In reference to new measures in the WADA Code 2021 and specifically Atypical Findings (ATF) Beyond Endogenous Substances:**

- When a laboratory reports a sample as an ATF, it sends a message to the Anti-Doping Organisation (ADO) that the Sample may or may not contain a prohibited substance.
- It is then the ADO's responsibility to conduct an investigation to determine whether the sample should be treated as an Adverse Analytical Finding (AAF) (i.e. a positive test) or not.
- The 2021 Code permits WADA to develop a list of other prohibited substances which may be reported as ATF and thereby trigger investigations.
- This approach is particularly helpful, for example, when trace levels of clenbuterol are detected in a sample. It is well known that meat contamination in Mexico and China can cause trace levels of clenbuterol to appear in an athlete's urine.

**Do you want to integrate such concept in the Equine Anti-Doping Rules (to have Atypical Findings (ATF) Beyond Endogenous Substances)?**

## FEEDBACK

<b>USA NF</b>	<p><b>US Team Veterinarian Comments</b></p> <ul style="list-style-type: none"> <li>• I think that is a good idea if possible and is economically reasonable.</li> <li>• Yes, in concept if there is sufficient incidences of ATF in Equestrian sport to pursue this.</li> <li>• This is more common in human athletes, but it could be helpful to have a list of prohibited substances that may be reported as ATF instead of having a new category.</li> </ul> <p><b>USEF DRUGS &amp; MEDICATION DEPARTMENT COMMENT</b></p> <p>We are not convinced that incorporating ATF's into the FEI rules would be a good idea. Since 2010 and the initial EADCM rules, it has become increasingly difficult to understand the rules as they become more complicated with additional carve-outs. If the MAG was reintroduced to the process for determination of alleged violations, several of these issues could be addressed with the intended flexibility as posted in the first question.</p>
<b>ITA NF</b>	<p>FISE is of the opinion that the FEI can collaborate with the Laboratories and the FEI Group of Lists to identify the relevant issues that should be reported as ATF, depending on the levels found. The above to obtain clear limit levels and therefore obtain the result of providing clear indications to the riders and their support staff and avoiding negligent or unwitting positivity.</p>
<b>GER NF</b>	<p>We are not sure if we understand the question correctly because under the current rules, it is already possible to close a case under certain circumstances if it becomes clear that there is no fault. Please give an example what kind of substances are meant.</p>
<b>ESP NF</b>	<p>Yes, it will offer better information</p>
<b>GBR NF</b>	<p>We can see the merit in introducing such an approach and would agree with the introduction of such a concept but would have concerns over the cost implications of undertaking appropriate investigations at a national level</p>



<b>DEN NF</b>	The given example with clenbuterol is out of scope for equine anti-doping (as it is obviously a herbivore species). As no relevant examples for equines is presented, we suggest abstaining from implementing this measure. Additionally we find the ability to cover atypical cases is already implemented in the current rules.
<b>BEL NF</b>	Yes, this could be useful
<b>SUI NF</b>	<p>Yes</p> <p>First of all, we need a precise, pragmatic, easily understandable, applicable definition of "CONTAMINATION" = evidence/detection of any prohibited substance, metabolite, preservative, ... which was not voluntarily incorporated into a equine ?</p> <p>Definition must consider show-conditions where FEI horses spend a large part of their lives and where horse control by RP is much more difficult / less performant. Environmental cleanliness is more or less out of his control... Hay/straw are provided par organization committee...</p> <p>Strict liability : if contamination can occur because of a lack of disinfection, cleaning, food (hay, straw, carrots,...), doping control boxes, medication boxes, security, through simple exposure, the organizer of a show might take a part of responsibility ( as a commercial contractant : riders pay for these services)... Same sharing of responsibility for commercial complement containing substances hidden on label.</p> <p>So that contamination is not only quantitative, but also qualitative, environmental, chemical (therapeutics).</p> <p>RP cannot afford (pay) for all investigations able to diminish/free his liability. So that a major work according PROPORTIONALITY must be done. If elective testing was performed before, proportionality of liability can get applicable. If contamination is evident, sanctions should be adaptive : proportionality to effective possible control of RP. Logbook of horse medication and supplementation throughout the year might be a good help. Hairroot analysis might also helpful to bring some timeframe in use of contaminants.</p> <p>A catalogue of TRESHOLD values and/or SCREENING limits(active/inactive on equine performances ) for all prohibited substances and generics must be completed, so that unnecessary processes might be avoided. The environmental dimension must be considered : botanics, water network, cleaning substances, aerosols, topics, washing areas...).</p> <p>FEI releases liability on stable, team, discipline, NF veterinarians. Unfair, because nobody is nowadays able to know these limits. FEI has to disclose these informations.</p> <p>OUT OF COMPETITION and ELECTIVE testing : must become reachable (not only affordable) for any doubt or question in upstream. Again : test of hay in sensible stables, test of drinkwater at shows, ... Neighbour horse(s) or a sick one. Stable staff eating/massaging on themselves with painkillers, and so on, drugs.</p> <p>Upstream, because keeping remains or leftoverfoods in case of later investigation would be very risky : conservation, labelling, spoilage... Now FEI has to agree with elective testing.</p> <p>FEI has to remain as close as possible to WADA's regulation, so that national Courts and TAS might be able to work on commune basis, with fairness and</p>

	<p>proportionality in judgements. A burden of proof must be balanced between accusation and defence.</p> <p>for Trainers in endurance : elective testing is a solution.</p>
<b>AUT NF</b>	We are not sure if we understand the question correctly because under the current rules, it is already possible to close a case under certain circumstances if it becomes clear that there is no fault. Please give an example what kind of substances are meant.
<b>IRI NF</b>	Yes, we do
<b>NED NF</b>	The FEI could integrate Adverse Analytical Findings in the Equine Anti-Doping Rules but the FEI has to realise that it might lead to more suspicions and it is very costly. On the other hand it might prevent cases like the capsaicin case. Therefore transparency about the deliberate and unintentional use with 'new' substances is required.
<b>EST NF</b>	Yes, it could be integrated.
<b>MEX NF</b>	Yes, integrate the concept.
<b>RUS NF</b>	Expanding the list of endogenous substances is welcomed. However, the proposal regarding the analysis of the origin of the substance in the horse is significantly difficult and not unambiguous. Analytical errors are possible . It is necessary to make sufficiently high standards or, in controversial cases, to waive sanctions until more detailed scientific research is carried out.
<b>SWE NF</b>	Yes, for substances such as Specified Substances.
<b>IRL NF</b>	Yes, this concept should be integrated in the EAD Rules.
<b>IJRC</b>	<p>The creation by the FEI of a "specified substances" category since 2016 demonstrates that cases of contamination require a particular approach. A definition, approach, categorization and legal treatment are needed. The definition must be pragmatic and easily usable. However, it must go beyond the simple quantitative aspect. Qualitative, geographical aspects and possible therapeutic effects must also be analyzed. As regards sanctions, the regime must also be revised downwards. Cases of contamination must be specifically addressed in a new regulation and must no longer give rise to analyses and expert reports that cost the person responsible (PR) a fortune as the PR in general does not have a pharmaceutical /analytical or toxicological background therefore outside the scope of their knowledge .</p> <p>ATF should be trended analysed periodically within the FEI and grouped to see if it is an emerging real issue or a contamination aspect and route cause analysis of the situation investigated for the occurrence and appropriate remedial action then taken on a periodic basis consistent with occurrence.</p>
<b>Yuri Yagi (JPN)</b>	This kind of concept seems to be acceptable in the Equine Anti-doping rules.
<b>Dr Teigen Bond</b>	Yes
<b>British Equestrian</b>	No feedback

<b>Trade Association</b>	
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## SANCTIONS RELATED QUESTIONS

Refer to the [Sanctions section](#) for more background on the specific questions below.

<b>Q</b>	<b>Do you want to increase the standard level for Banned Substance cases from 2 years to 4 years to align with the WADA Code and the FEI Anti-Doping Rules for Human Athletes?</b>
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## FEEDBACK

<b>USA NF</b>	The U.S. does not support an increase to 4 years and supports a 2 year standard across all disciplines. A human athlete has far greater control over what they put into their own body than the control that can be exercised over equine athletes. A 4 year ban could mean the horse / athlete partnership never returns to competition.
<b>ITA NF</b>	<p>FISE is not in favour of increasing the standard minimum penalty for banned substances for various reasons.</p> <p>1) The alignment with the WADA code makes sense for human athletes who still have a role and a part in the phenomenon of taking prohibited drugs, but this assumption is not at all clear in the case of the administration of substances to horses, where many different figures, with different roles, may be involved in addition to the rider, such as e.g.: owners, coaches, instructors, veterinarians, groom, farriers, truck drivers, etc.</p> <p>2) In consideration of what is indicated in point 1, the athletes of Equestrian Sports would have double responsibilities, compared to those of athletes of other sports, having the responsibility of 4 years, as an athlete (like all other athletes of other sports) and, more over, the risk in addition to this, of another 4 full years for the horse.</p> <p>3) The recent economic crisis, following the COVID-19 pandemic diseases, will certainly also be felt for Equestrian Sports and an increase in sanctions for cases of positivity of horses, given the current regulations, would affect all FEI events and therefore also for numerous competitions of lower levels, normally carried out by amateurs, who in most cases, can have positive horses for negligent and involuntary reasons, often for real ignorance of the withdrawal times to allow a complete elimination of the lawfully given pharmacological treatments.</p>
<b>GER NF</b>	No
<b>ESP NF</b>	We think that it is far enough with the sanction of 2 years
<b>GBR NF</b>	Yes

<b>DEN NF</b>	It seems reasonable from a logical point of view to align the standard levels of both humans and horses, as one benefits from the other with regards to performance. Apart from that it signals awareness of securing the welfare of the horse with regards to the increasing debate of social license for horse sport.
<b>BEL NF</b>	No
<b>SUI NF</b>	No, the FEI Tribunal should be given as much flexibility as possible to take into account the very wide variety of cases. The Sanction Commission of the Swiss Equestrian Federation, while based on ESPL, is free at national level to sanction according to their ruling of the case. We think this is appropriate for an independent sanction unit.
<b>AUT NF</b>	No
<b>IRI NF</b>	Yes, we do
<b>NED NF</b>	No. The same sanctions should apply to all Athletes, regardless of their Discipline or level but the FEI should always take the history of the horse and rider in account. If Banned Substances are found the horse should always be suspended, it punishes the rider, the horse can use the rest and it might trigger the persons responsible to be more aware of whom should treat their horses.
<b>EST NF</b>	No
<b>MEX NF</b>	No, in horses, the PR is always the athlete even though more people could be involved, therefore finding a substance in the horses body should not impact the athlete ´s careear more than 2 years. We agree with banned substances in the Athlete ´s body should carry a 4 year suspension, but with horses, sometimes the Athlete is in a gray area.
<b>RUS NF</b>	No
<b>SWE NF</b>	No
<b>IRL NF</b>	No, there are too many variables with equestrian sports (several persons involved with the horse; more opportunities for intentional/accidental administration or contamination) unlike sport for humans only where the athlete alone is responsible for his/her actions.
<b>IJRC</b>	No increase is necessary for EADCMR
<b>Yuri Yagi (JPN)</b>	No I don't. It's much more difficult for the PRs to keep their horses completely clean in terms of doping than to keep human beings (themselves) completely clean. Therefore it makes sense there is a gap in the sanctions between for human doping violation cases and for horse doping violation cases.
<b>Dr Teigen Bond</b>	Yes
<b>British Equestrian Trade Association</b>	No Feedback

<b>Q</b>	<b>Shall the same standard level (be it 2 years or 4 years) apply across all FEI Disciplines?</b>
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## FEEDBACK

<b>ITA NF</b>	FISE agrees that the sanctions are the same for all disciplines. This also because the economic interests and popularity of these are different in the different countries that make up the FEI.
<b>GER NF</b>	Yes. Special procedures for minors do exist, however we recognise that a different treatment of members of a vaulting squad is difficult and are open for a solution to address this.
<b>ESP NF</b>	It is better to have the same standard level for all disciplines
<b>GBR NF</b>	Yes, we need to be united for transparency and fairness across all FEI disciplines.
<b>DEN NF</b>	Yes, although vaulting might present as a different case overall
<b>BEL NF</b>	Yes
<b>SUI NF</b>	Yes, if there is a standard level it must apply to all disciplines.
<b>AUT NF</b>	Yes
<b>IRI NF</b>	Yes, please
<b>NED NF</b>	Yes
<b>EST NF</b>	No
<b>MEX NF</b>	No, see above. All FEI Disciplines should be treated the same in Anti-Doping Cases.
<b>RUS NF</b>	Yes
<b>SWE NF</b>	Yes
<b>IRL NF</b>	Yes, the same standard should be applied, regardless of discipline.
<b>IJRC</b>	Yes especially for the Olympic discipline. Doping is doping. Riders should be athletes and role models. We feel strongly that if drugs are above the therapeutic index, that drug reservoir would be very unlikely to be picked up via accidental measures then the full measure of the FEI sanctions should be employed.
<b>Yuri Yagi (JPN)</b>	No feedback

<b>Dr Teigen Bond</b>	Yes, I think that is fair.
<b>British Equestrian Trade Association</b>	No Feedback

Q	<b>Further increase the Sanctions? If so, how?</b>
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## FEEDBACK

<b>USA NF</b>	<p>The U.S. does not support the extension of automatic disqualification to Nations Cups:</p> <ul style="list-style-type: none"> <li>• At a Games, the environment in the lead up to the event is far more controlled and elective testing is available. In addition, the stables and venues are of the highest standards and there are many more biosecurity controls put in place surrounding Games to help minimize the potential for a positive. For normal Nations Cups this not always the case and it is far more difficult to control the environment during the build up to a Nations Cup.</li> <li>• Equestrian is not, by nature, a sport that exists week in week out in a team environment with stability of team members (athletes). So widening the "collective blame" mantra is not balanced against the ability of athletes to morally influence other athletes on a regular basis.</li> <li>• Chefs in Jumping in some countries already struggle to fill Teams – if athletes feel the actions of others will impact on them (loss of Ranking points / risking their horses etc) then it will further lessen the appeal of Nations Cups.</li> <li>• Perhaps clarification is needed on the Olympic Regs, Art 623.2. Athletes are disqualified from the Team competition but NOT from the Individual competition.</li> <li>• In reality it is a moot point for the Olympics as it is now Teams of three with three to count. However, it is understood why the Article still exists.</li> </ul> <p>We encourage the FEI to seek ways to further expedite the test results, especially in Team scenarios.</p>
<b>ITA NF</b>	<p>FISE does not think it is right to increase sanctions. However, with regard to Endurance Trainers, FISE agrees to maintaining the current sanction mechanism envisaged for Trainers in Endurance.</p>
<b>GER NF</b>	The current rules provide for sufficient sanctions, no increase is necessary.
<b>ESP NF</b>	No feedback
<b>GBR NF</b>	No
<b>DEN NF</b>	No, however, it would be interesting to run a survey of how athletes respond to sanctions across disciplines and regions to ensure the current

	level is adequate to secure horse welfare and level playing field across all sectors.
<b>BEL NF</b>	No
<b>SUI NF</b>	No
<b>AUT NF</b>	Not necessary
<b>IRI NF</b>	We agree with increasing the sanctions. One way to do so is to impose a period of ineligibility for first-time offenders of controlled medication substances.
<b>NED NF</b>	No
<b>EST NF</b>	No
<b>MEX NF</b>	No
<b>RUS NF</b>	No
<b>SWE NF</b>	8 years or lifetime if the doping violation leads to that the horse died or have to be put down (esp. Endurance)
<b>IRL NF</b>	No
<b>IJRC</b>	No increase is necessary
<b>Yuri Yagi (JPN)</b>	I don't think so for the same reason for Q4.
<b>Dr Teigen Bond</b>	No, no need to further increase the sanctions
<b>British Equestrian Trade Association</b>	No Feedback

<b>Q</b>	<b>Do you want to keep a different team disqualification system depending on the Event (where the doping violation takes place?)</b>
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## FEEDBACK

<b>USA NF</b>	<p>The U.S. does not support the extension of automatic disqualification to Nations Cups:</p> <ul style="list-style-type: none"> <li>• At a Games, the environment in the lead up to the event is far more controlled and elective testing is available. In addition, the stables and venues are of the highest standards and there are many more biosecurity controls put in place surrounding Games to help minimize the potential for a positive. For normal Nations Cups this not always the case and it is far</li> </ul>
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	<p>more difficult to control the environment during the build up to a Nations Cup.</p> <ul style="list-style-type: none"> <li>• Equestrian is not, by nature, a sport that exists week in week out in a team environment with stability of team members (athletes). So widening the “collective blame” mantra is not balanced against the ability of athletes to morally influence other athletes on a regular basis.</li> <li>• Chefs in Jumping in some countries already struggle to fill Teams – if athletes feel the actions of others will impact on them (loss of Ranking points / risking their horses etc) then it will further lessen the appeal of Nations Cups.</li> <li>• Perhaps clarification is needed on the Olympic Regs, Art 623.2. Athletes are disqualified from the Team competition but NOT from the Individual competition.</li> <li>• In reality it is a moot point for the Olympics as it is now Teams of three with three to count. However, it is understood why the Article still exists.</li> <li>• We encourage the FEI to seek ways to further expedite the test results, especially in Team scenarios.</li> </ul>
<b>ITA NF</b>	<p>FISE believes that in all competitions, where it is possible to <u>discard a result</u>, the principle of individual responsibility should be adopted and, therefore, that there is <u>no automatic disqualification</u> of the whole team</p>
<b>GER NF</b>	<p>This question is of such importance that we cannot give an answer within the short time frame until 15 May. We have to discuss it with our relevant bodies.</p> <p>If you are going to provide proposals for modifications, please word them in a way that we can choose from clear options (A – B – C).</p>
<b>ESP NF</b>	<p>We think that the system must be the same for all events</p>
<b>GBR NF</b>	<p>No</p>
<b>DEN NF</b>	<p>We agree with the Netherlands (please review the Dutch reply)</p>
<b>BEL NF</b>	<p>What is the exact question? Do we want to keep it as it is now? Do we want all team competitions to follow the rules as now for the Olympic games? Do we want all team competitions to follow the rules as now for all other events?</p>
<b>SUI NF</b>	<p>No, we think the disqualification system should be the same for all events.</p>
<b>AUT NF</b>	<p>This is a question with great implications and cannot be answered in a nutshell. A decision by our management board and all sports departments is required here.</p>
<b>IRI NF</b>	<p>No, we do not think this is necessary.</p>
<b>NED NF</b>	<p>If we have to choose between the two options mentioned we choose to keep a different team disqualification system depending on the Event where the doping violation takes place.</p>



	We prefer that, apart from Olympic- Paralympic Games and World Equestrian Games, at all events the results of the Person Responsible may be disqualified in all Competitions and will be subtracted from the team result, to be replaced with the results of the next applicable team member.
<b>EST NF</b>	When choosing the answer from two mentioned options, then yes, we choose to keep a different team disqualification system depending on the event.
<b>MEX NF</b>	We don't think that disqualification should depend on the event. Every event must be treated equally.
<b>RUS NF</b>	Yes
<b>SWE NF</b>	Yes
<b>IRL NF</b>	<p>Yes retain the current system but extend to it so as to include the World Equestrian Games &amp; Paralympic Games, i.e. if a member of a team is found to have committed a violation of the ECM Rules during an event where a team ranking is based on the addition of individual results, the results of the Person Responsible may be disqualified in all competitions and subtracted from the team result, to be replaced with results of the next applicable team member.</p> <p>We suggest changing "may be" to "will be" in the following paragraph, referred to in the advisory notes, as follows:</p> <p>"At all other Events, the results of the Person Responsible will be disqualified in all Competitions and will be subtracted from the team result, to be replaced with the results of the next applicable team member. So, this means that at all other Events the disqualification of the Athlete's results in all other competitions at the Event is not automatic."</p>
<b>IJRC</b>	Yes. We feel comfortable with the actual rule.
<b>Yuri Yagi (JPN)</b>	No feedback
<b>Dr Teigen Bond</b>	No. I think it is unfair to disqualify a whole team because one team member did something wrong. I understand the principle of team consequences to individual actions, but people only have so much control and influence over other team members. If one team member really wants to drug themselves or their horse, their other team members will not be able to stop them. It is unfair to punish the entire team for a mistake (or intentional action) by one member of the team.
<b>British Equestrian Trade Association</b>	No Feedback

<b>Q</b>	<b>Or would you prefer to have the same principle that the whole team shall be disqualified if one team member breached the FEI Anti-Doping Rules regardless of the Event? For example, if a member of a Nations Cup team tests positive, should the whole team be automatically disqualified?</b>
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## FEEDBACK

<b>ITA NF</b>	No answer provided
<b>GER NF</b>	This question is of such importance that we cannot give an answer within the short time frame until 15 May. We have to discuss it with our relevant bodies. If you are going to provide proposals for modifications, please word them in a way that we can choose from clear options (A – B – C).
<b>ESP NF</b>	No answer provided
<b>GBR NF</b>	Yes. With a drop score system, teams may take chances knowing that, as a team, they have little to lose in some cases.
<b>DEN NF</b>	We agree with the Netherlands (please review the Dutch reply)
<b>BEL NF</b>	What is the exact question? Do we want to keep it as it is now? Do we want all team competitions to follow the rules as now for the Olympic games? Do we want all team competitions to follow the rules as now for all other events?
<b>SUI NF</b>	Yes, if tested positive in team event.
<b>AUT NF</b>	This is a question with great implications and cannot be answered in a nutshell. A decision by our management board and all sports departments is required here.
<b>IRI NF</b>	No, we do not agree with disqualifying the whole team. We prefer individual disqualification.
<b>NED NF</b>	If we have to choose between the two options mentioned we choose to keep a different team disqualification system depending on the Event where the doping violation takes place. We prefer that, apart from Olympic- Paralympic Games and World Equestrian Games, at all events the results of the Person Responsible may be disqualified in all Competitions and will be subtracted from the team result, to be replaced with the results of the next applicable team member.
<b>EST NF</b>	No, only the athlete tested positive should be disqualified.
<b>MEX NF</b>	No. We don't think that the whole team should be disqualified. One team member breaching the Anti-Doping Rules shouldn't affect the entire team. That will look like there is more than one person responsible.

<b>RUS NF</b>	No
<b>SWE NF</b>	No
<b>IRL NF</b>	No
<b>IJRC</b>	No. We feel comfortable with the actual rule.  1.If there is testing done in Between rounds and the horse is clear in the first round but not after second, only disallow the score from the second round. If testing is only done after all competitions, disallow the score throughout. 2.Absolutely not. At many shows it is too easy for contamination to occur, even as riders we cannot be in control of the horse 24hours a day. For one tiny contamination of one horse to disqualify a whole team is not fair. 3.Only the positive athlete should be disqualified.
<b>Yuri Yagi (JPN)</b>	No feedback
<b>Dr Teigen Bond</b>	No. I think it is unfair to disqualify a whole team because one team member did something wrong. I understand the principle of team consequences to individual actions, but people only have so much control and influence over other team members. If one team member really wants to drug themselves or their horse, their other team members will not be able to stop them. It is unfair to punish the entire team for a mistake (or intentional action) by one member of the team.
<b>British Equestrian Trade Association</b>	No Feedback

## OTHER MISCELLANEOUS COMMENTS:

### From a rider who wished to remain anonymous:

Stable security can be very very lax in many shows , specially the smaller ones like 1 & 2 \* & in some cases non-existent ! And I tell you this from first-hand experience . Sometimes no wrist bands given to those allowed to access the stables , no gate , no security control , etc ...However even in such a case you ( FEI ) still holds the rider 100% responsible . That cannot be fair .

Another issue to consider is when a rider competes with a horse he does not own & not based at his own stables , that he maybe rides occasionally for training then at the show.

The persons having access to the horse can be a groom , that is not the rider's groom , the owner , vet ... Still , you hold the rider 100% responsible , not very fair ...If I as a rider am not told that the horse is given any prohibited substance , what am I supposed to do ? Test any horse that is not totally under my supervision ?

### From Eddie Moloney

Regarding Pony Measuring

1. Should a pony FEI measuring be treated as in-competition? Should the full list of drugs apply as this is not a competition? Should it not be just substances which influence the size of a pony i.e sedation tranquilizer?
2. As a measuring is not in-competition is 1,500.00 CHF fine plus 1,000.00 CHF costs a very severe sanction plus 4 years violation? Use of a controlled substance

Triamcinolone Acetonide outside of competition is to look after a pony's welfare, this does not influence the height of a pony.

3. Why should a senior athlete suffer the same sanction as an owner when they are the same person, should the sanction only be applied to the owner's licence not the athlete's licence when it is the one person?
4. Should it be the NF's obligation to ensure a pony's ownership corresponds with the legally registered owner before accepting an FEI registration?
5. Where does it state in your rules for pony measuring that a senior riders licence should be affected with a violation for 4 years while only acting as an owner?
6. If a pony's measuring is null and void is this not enough punishment without a very severe fine the same as if the pony was in-competition plus the violation?

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