CALIFORNIA DEPARTMENT OF FOOD & AGRICULTURE

EQUINE MEDICATION MONITORING PROGRAM

Drugs and Medication Guidelines

January 2018

Introduction

The California Equine Medication Monitoring Program (EMMP) is an industry funded program to ensure the integrity of public equine events and sales in California through the control of performance and disposition enhancing drugs and permitting limited therapeutic use of drugs and medications. The EMMP and the industry is dedicated and committed to promote the health, welfare and safety of the equine athlete.

Owners, trainers, exhibitors, veterinarians and consignors of equines to public sales have a responsibility to be familiar with the California EMMP and the California Equine Medication Rule. California law (Food and Agricultural Code Sections 24000-24018) outlines the equine medication rule for public equine events in California. **The owner, trainer and consignor have responsibility to ensure full compliance with all elements of the California Equine Medication Rule.** Owners, trainers, exhibitors, veterinarians and consignors of equines to public sales must comply with both the California Equine Medication Rule and any sponsoring organization drug and medication rule for an event. **The more stringent medication rule applies for the event.** The California Equine Medication Rule is posted on the website: http://www.cdfa.ca.gov/ahfss/Animal_Health/emmp/

The information contained in this document provides advice regarding the California Equine Medication Rule and application of the rule to practical situations. The EMMP recognizes that situations arise where there is an indication for legitimate therapeutic treatment near the time of competition at equine events. The EMMP regulations permit the use of therapeutic medication in certain circumstances to accommodate legitimate therapy in compliance with the requirements of the rule. This document provides information on rules, regulations and general guidance to exhibitors, consignors and veterinarians to help avoid inadvertent violations and to minimize the chances of positive drug detections.

Exempt Events

The following events are **exempt** from EMMP regulations:

- A rodeo-related competition, which is strictly a timed performance, with no subjective judging, held apart from a public equine event. (Includes barrel racing, team penning, ranch sorting, ropings, and gymkhana)
- A sale of solely race horses.
- Competitions under the jurisdiction of the California Horse Racing Board.
- A public equine event for which the class or event entry fee is less than $4.99 per class and other fees do not exceed $19.99. (Other fees include, but are not limited to, grounds fees, stall fees or office fees.)
- A public equine event in which all fees for participation are less than $19.99. (Fees include, but are not limited to, class fees, grounds fees, stall fees or office fees).

Prohibited and Permissible Drugs

The California Equine Medication Rule classifies drugs as prohibited substances and permissible substances. A **prohibited substance** is defined as any drug or medication that is a stimulant, a depressant, a tranquilizer, an anesthetic including local anesthetic, an analgesic, an anabolic steroid, a corticosteroid (excluding dexamethasone) and a soring agent. A prohibited substance administered for therapeutic purposes must be **withdrawn 24 hours before a public competition or 72 hours before a public sale**. The rule requires filing of a Drug Declaration Form (CA Form 76-027 or United States Equestrian Federation (USEF) equivalent form) for any prohibited substance administered to an equine in the three (3) days before public competition or in the five (5) days before a public sale.

A **permissible substance** is a therapeutic drug or medicine **or** a drug or medicine found in a sample within the established maximum detectable plasma or urine levels. There are nine (9) permissible drugs with restriction on the established maximum detectable plasma or urine levels. The nine (9) permissible medications, not to exceed maximum allowable levels, include: dexamethasone (Azium®), diclofenic acid (Surpass®), firocoxib (Equioxx®), flunixin (Banamine®), ketoprofen (Ketofen®), meclofenamic acid (Arquel®), methocarbamol (Robaxin®), naproxen (Naprosyn®), and phenylbutazone (Butazolidin®).
See the table on pages 4-5, *Nine (9) Permissible Medications with Maximum Allowable Limit Restrictions - Dose and Time Recommendations.*

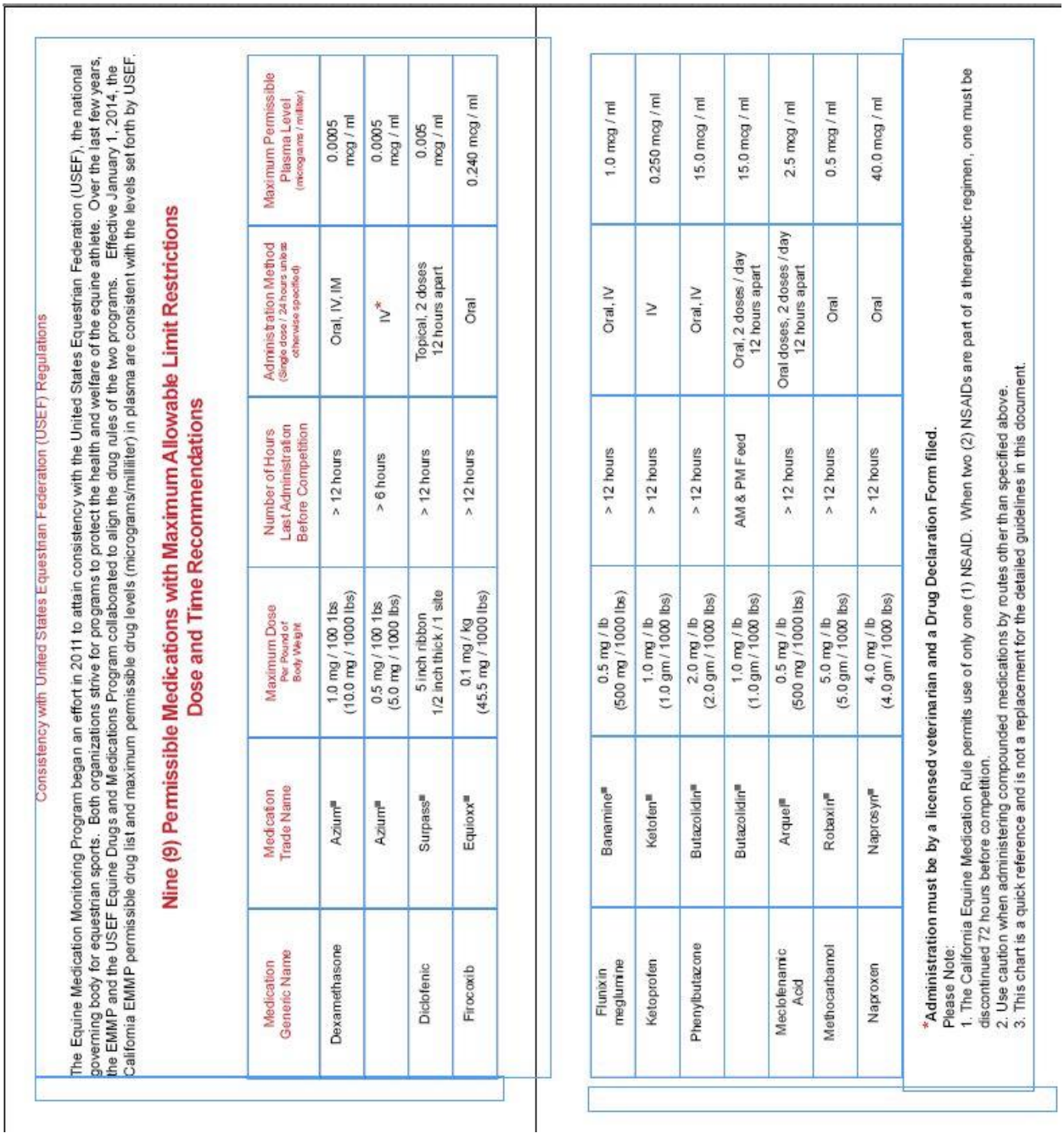
Therapeutic Use

The California Equine Medication Rule defines a **therapeutic drug or medicine** as a drug or medicine prescribed by a licensed veterinarian for the treatment of a diagnosed illness or injury. All drug and medication use must be for legitimate therapeutic purposes only. Administration of a prohibited substance for non-therapeutic purposes including but not limited to, clipping, shipping, shoeing, or training, requires that the animal be kept out of competition until the prohibited substance is no longer detectable in equine blood or urine samples. See Page 9 for the list *Estimated Drug Detection Times*.
The California Equine Medication Rule allows use of modern therapeutic pharmacologic treatments for illness or injury, unless the treatment 1) involves use of a prohibited substance and the animal is not withdrawn from competition or sale following treatment, 2) results in the presence of more than one non-steroidal anti-inflammatory drug (NSAID) in the urine or plasma, or 3) results in the presence of the substance exceeding the maximum allowable level in blood or urine. The EMMP advises owners and trainers to contact the EMMP veterinarian to confirm if intended drug use for a particular purpose is therapeutic.

Herbal/Natural Products

Herbal and natural products have the potential to contain prohibited substances. Food and Drug Administration (FDA) approval is not necessary for manufacturers to produce commercial herbal products; therefore, herbal products are not scientifically tested or regulated as modern

medications. When administering a product with an herbal or natural label to an equine, be aware that specific ingredients and quantitative analyses are not known for these products. Contrary to a manufacturer claim, detection of a prohibited substance (positive drug test) may occur after use of herbal products, such as valerian root, kava, chamomile, capsaicin, and devils claw.



Consistency with United States Equestrian Federation (USEF) Regulations

The Equine Medication Monitoring Program began an effort in 2011 to attain consistency with the United States Equestrian Federation (USEF), the national governing body for equestrian sports. Both organizations strive for programs to protect the health and welfare of the equine athlete. Over the last few years, the EMMP and the USEF Equine Drugs and Medications Program collaborated to align the drug rules of the two programs. Effective January 1, 2014, the California EMMP permissible drug list and maximum permissible drug levels (micrograms/milliliter) in plasma are consistent with the levels set forth by USEF.

Nine (9) Permissible Medications with Maximum Allowable Limit Restrictions
Dose and Time Recommendations

Medication Generic Name	Medication Trade Name	Maximum Dose Per Pound of Body Weight	Number of Hours Last Administration Before Competition	Administration Method (Single dose / 24 hours unless otherwise specified)	Maximum Permissible Plasma Level (micrograms / milliter)
Dexamethasone	Azium®	1.0 mg / 100 lbs (10.0 mg / 1000 lbs)	> 12 hours	Oral, IV, IM	0.0005 mcg / ml
	Azium®	0.5 mg / 100 lbs (5.0 mg / 1000 lbs)	> 6 hours	IV*	0.0005 mcg / ml
Diclofenic	Surpass®	5 inch ribbon 1/2 inch thick / 1 site	> 12 hours	Topical, 2 doses 12 hours apart	0.005 mcg / ml
Firocoxib	Equioxx®	0.1 mg / kg (45.5 mg / 1000 lbs)	> 12 hours	Oral	0.240 mcg / ml
Flunixin meglumine	Banamine®	0.5 mg / lb (500 mg / 1000 lbs)	> 12 hours	Oral, IV	1.0 mcg / ml
Ketoprofen	Ketofen®	1.0 mg / lb (1.0 gm / 1000 lbs)	> 12 hours	IV	0.250 mcg / ml
Phenylbutazone	Butazolidin®	2.0 mg / lb (2.0 gm / 1000 lbs)	> 12 hours	Oral, IV	15.0 mcg / ml
	Butazolidin®	1.0 mg / lb (1.0 gm / 1000 lbs)	AM & PM Feed	Oral, 2 doses / day 12 hours apart	15.0 mcg / ml
Meclofenamic Acid	Arquel®	0.5 mg / lb (500 mg / 1000 lbs)	> 12 hours	Oral doses, 2 doses / day 12 hours apart	2.5 mcg / ml
Methocarbamol	Robaxin®	5.0 mg / lb (5.0 gm / 1000 lbs)	> 12 hours	Oral	0.5 mcg / ml
Naproxen	Naprosyn®	4.0 mg / lb (4.0 gm / 1000 lbs)	> 12 hours	Oral	40.0 mcg / ml

*Administration must be by a licensed veterinarian and a Drug Declaration Form filed.

Please Note:

1. The California Equine Medication Rule permits use of only one (1) NSAID. When two (2) NSAIDs are part of a therapeutic regimen, one must be discontinued 72 hours before competition.
2. Use caution when administering compounded medications by routes other than specified above.
3. This chart is a quick reference and is not a replacement for the detailed guidelines in this document.

12 Hour Injectable Rule

The California Equine Medication Rule prohibits the administration of any injectable substance to an equine within twelve (12) hours of competition, **except for a veterinarian administering the following:**

1. A minimum of 1 liter of polyionic fluids per 100 pounds of body weight administered within 6-12 hours of competition. (NOTE: Fluids supplemented with concentrated electrolytes, such as magnesium, are prohibited.)
2. Antibiotics (NOTE: Procaine Penicillin is prohibited).
3. Dexamethasone injection, not to exceed 0.5 milligrams per 100 pounds, exclusively for the treatment of acute urticaria (hives) within 6-12 hours of competition.

The veterinarian must file a Drug Declaration Form (CA Form 76-027 or USEF Form) within 1 hour of administration of these injectable substances.

Therapeutic Administration of Dexamethasone

The California Equine Medication Rule provides for the use of dexamethasone in equines only for therapeutic purposes, such as the treatment of an existing inflammatory condition related to illness or injury. Administration of products or preparations that contain dexamethasone as an active ingredient (i.e., Naquasone® bolus contains 5.0 milligrams of dexamethasone), should take into account the actual weight of the equine with the dosing guidelines on Page 4-5. See Page 9, *Estimated Detectable Timelines For Drugs.*

The rule establishes a maximum detectable permissible level for dexamethasone in blood and urine. The maximum permissible plasma concentration of dexamethasone is 0.0005 micrograms per milliliter; the maximum permissible urine concentration is 0.09 micrograms per milliliter. The dose of dexamethasone should be accurately calculated for the actual weight of the animal before administration. The maximum allowable daily dose of dexamethasone is 10.0 milligrams. No more than 1.0 milligrams/100 pounds of body weight of Dexamethasone injectable solution or oral powder should be administered to the equine in a 24 hour period. Dexamethasone should not be administered for more than five (5) consecutive days.

Guidance for Administration of Dexamethasone:

1. 12 Hour Injectable Administration: A dose of dexamethasone 1.0 mg (or less) per 100 pounds IV or IM is permitted 12 hours or MORE before competition.
2. 12 Hour Oral Administration: A dose of dexamethasone 1.0 mg (or less) per 100 pounds orally is permitted 12 hours or more before competition.
3. Emergency Use for Treatment of Hives (Urticaria): A dose of dexamethasone 0.5 mg (or less) per 100 pounds administered by a licensed veterinarian is permitted at 6 or more hours before competition for the treatment of hives (urticaria).

Note:

*Corticosteroids, including but not limited to, prednisolone (i.e., Solu-Delta-Cortef®) are prohibited substances. Prohibited substances used for the therapeutic treatment of illness or injury must be withdrawn 24 hours before competition. A written Drug Declaration Form

must be filed for the administration of a prohibited substance administered within the three (3) days before competition and within the five (5) days before public sale. The rule does not permit the use of corticosteroids for non-therapeutic purposes, such as to affect mood or enhance performance. The animal receiving the corticosteroid for non-therapeutic purposes must be kept out of competition until the substance is no longer detectable in the animal's blood or urine sample.

Therapeutic Administration of Methocarbamol

The California Equine Medication Rule provides for the use of methocarbamol in equines only for legitimate therapeutic purposes. Before administration, the dose of methocarbamol should be accurately calculated for the actual weight of the animal. Methocarbamol administration should be no more than 5.0 mg per pound of body weight in twelve (12) hours. For a 1,000 pound animal, the maximum dose is 5 grams each 12 hours, which equals ten (10) 500 milligram tablets or 50 cc of methocarbamol injectable (100 milligrams per milliliter). No part of a methocarbamol dose should be administered during the 12 hours before competition. Feed medicated with methocarbamol must be consumed and/or removed from access 12 hours before competition. Methocarbamol should not be administered for more than five (5) consecutive days.

Therapeutic Use of Non-Steroidal Anti-Inflammatory Drugs (NSAIDs)

The California Equine Medication Rule permits the use of non-steroidal anti-inflammatory drugs for the therapeutic treatment of equine illness or injury. Permitted NSAIDs include: diclofenac acid, firocoxib, phenylbutazone, flunixin, ketoprofen, meclofenamic acid and naproxen. The California Equine Medication Rule allows use of only one (1) NSAID. Detection of more than one NSAID in a plasma or urine sample collected from an equine in show or competition is a violation. When two NSAIDs are part of a therapeutic regimen, one NSAID must be discontinued at least 72 hours before competition.

The dose for any NSAID should be accurately calculated for the actual weight of the animal before administration. No part of any NSAID dose should be administered during the 12 hours before competition. Feed medicated with an NSAID must be consumed and/or removed from access at least 12 hours before competition.

Guidance for the Administration of NSAIDs:

1. **Diclofenic Acid (Surpass®):** The maximum dose of diclofenic acid cream is not more than 73 mg (1/2 inch wide 5 inch ribbon) every 12 hours to not more than one site. Application of diclofenic acid cream should not be in combination with any other topical preparations, including but not limited to, dimethyl sulfoxide (DMSO), nitrofurazone or liniments. Administration of diclofenic acid cream should not be for more than ten (10) consecutive days.
2. **Firocoxib (Equioxx®):** The maximum daily dose of firocoxib for a 1,000 pound equine is 45.5 mg, which equals four (4) marks on the medication dosing syringe supplied by the

manufacturer. Firocoxib should not be administered for more than fourteen (14) consecutive days.

3. **Phenylbutazone (Butazolidin®):** The maximum daily dose of phenylbutazone is 2.0 grams for a 1,000 pound equine, which equals two (2) 1.0 gram tablets or two (2) 1.0 gram units of paste or 10.0 cc of 200 mg / ml injectable solution. Half of the maximum daily dose (1.0 gm/1000 lbs) can be administered orally every 12 hours during a five (5) day treatment program. Phenylbutazone should not be administered for more than five (5) consecutive days.
4. **Flunixin (Banamine®):** The maximum daily dose of flunixin is 500 milligrams for a 1,000 pound equine, which equals two (2) 250 milligram packets of granules ***or*** 500 milligrams of the oral paste ***or*** 10 cc of 50 mg/ml injectable solution. Flunixin should not be administered for more than five (5) consecutive days.
    a. Emergency administration of flunixin (Banamine®) by a veterinarian is allowable for the treatment of colic or an opthalmic emergency provided there is a 24 hour withdrawal of the equine from competition after administration. The veterinarian must file a Drug Declaration Form (CA Form 76-027 or USEF equivalent form) with an event manager within 1 hour of drug administration. A finding of flunixin (Banamine®) and any other NSAID in the same plasma or urine sample collected 24 hours or more after documented emergency treatment of an equine is not a violation.

5. **Ketoprofen (Ketofen®):** The maximum daily dose of ketoprofen is 1.0 gram for a 1,000 pound equine, which equals 10.0 cc of the 100 mg / ml of injectable solution. Ketoprofen should not be administered for more than five (5) consecutive days.
6. **Meclofenamic Acid (Arquel®):** The maximum daily dose of meclofenamic acid is 0.5 gram for a 1,000 pound equine, which equals one (1) 500 milligram packet of granules. Meclofenamic acid should not be administered for more than five (5) consecutive days.
7. **Naproxen (Naprosyn®):** The maximum daily dose of naproxen is 4.0 grams for a 1,000 pound equine, which equals eight (8) 500 milligram tablets. Naproxen should not be administered for more than five (5) consecutive days.

Withdrawal of Equine from Event after Administration of Therapeutic Medication

An equine must be **withdrawn from competition** for a minimum of:

- 24 hours after therapeutic administration of a prohibited substance
- 45 days after the administration of reserpine and fluphenazine
- 90 days after the administration of an anabolic steroid.

An equine must be **withdrawn from a public sale** for a minimum of:

- 72 hours after therapeutic administration of a prohibited substance
- 72 hours after the administration of a therapeutic NSAID.

Estimated Detectable Timelines for Drugs

The California Medication Rule allows for the therapeutic administration of drugs and medications. The California Equine Medication Rule does not permit use of a permissible or prohibited substance for other than therapeutic treatment of illness or injury. If a prohibited substance is administered for any other purpose, including but not limited to, clipping, shipping, or training, the animal must be kept out of competition until the prohibited substance is no longer detectable in the animal's blood or urine sample. To assist in determining an appropriate withdrawal time of an equine from competition after drug administration see *Estimated Drug Detection Times* (Page 9). Reliance upon this guidance does not guarantee compliance with the rules since individual equine response to drugs may vary. Depending upon the drug administration scenario (i.e., the formulation of the drug, the dose or doses of drug administered, the frequency of administration, the route of administration, animal weight, and health status of the animal), it is possible that substances and their metabolites may remain detectable in the blood or urine of the animal for a number of days following the last administration. At the time of this printing, this EMMP guidance is consistent with USEF guidance. Please note, implementation of improved testing procedures occur as more sensitive tests develop; therefore, reliance on this guidance information is not acceptable as a defense to a violation of the rule in the event of positive drug test.

Exhibitors, owners and trainers should consult the drug manufacturer, knowledgeable veterinarians or the Kenneth L. Maddy Equine Analytical Chemistry Laboratory for more specific advice on the administration of medications for non-therapeutic purposes.

Estimated Drug Detection Times

Anabolic Steroids	
Bolderone	82 days
Nandrolone	35 days
Stanozolol	47 days
Testosterone	30 days
Long Acting Tranquilizers and Psychotropics	
Fluphenazine and Reserpine	90 days
Shorter- Acting Tranquilizers and Sedatives	
Acepromazine, Detomidine, Xylazine	7 days
Procaine and Procaine Penicillin	14 days
Local Anesthetics (other than procaine)	
Lidocaine, Mepivicaine	7 days
Methylprednisolone	14 days
Corticosteroids (Other than Methylprednisolone)	
Triamcinolone and betamethasone	7 days
Antihistamines	
Cyproheptadine and Pyrilamine	7 days
Albuterol	7 days

For additional guidelines on other drugs or medications, call 916-900-5039

Drug Declarations Forms

A **Drug Declaration Form** (CDFA Form 76-027 or USEF equivalent form) is a legal document that an exhibitor or consignor must complete and file with an event manager for any equine at an event that has received a prohibited substance deemed by a licensed veterinarian as therapeutically necessary for the treatment of an illness or injury. An **owner/exhibitor/trainer** must complete and file a Drug Declaration Form for any equine that has received a **prohibited substance within the three (3) days before the day being shown**. A consignor must complete and file a Drug Declaration Form for any equine that has received a **prohibited substance or NSAID within the five (5) days before the day of the sale.**

The owner/exhibitor/trainer is to submit the completed Drug Declaration Form to the event manager within one (1) hour of administration of the product(s) at the event. If the product administration occurs at a time other than during equine event or sale hours, the owner/exhibitor/trainer is to submit the completed form within one (1) hour after an event manager returns to duty. An event manager must sign and date the Drug Declaration Forms and submit them to the EMMP or USEF. Properly filed drug declarations, along with other relevant evidence, are given consideration when the chemical analysis of a sample obtained from an equine at an equine event or sale indicates the presence of a prohibited substance ***or*** more than one (1) NSAID ***or*** presence of a substance exceeding maximum allowable limits. EMMP will consider the information on the Drug Declaration Form and any other relevant evidence in determining if there is a rule violation.

Sample Collection

EMMP field personnel receive assignments to randomly select equines competing in or consigned to a registered event for sample collection. At public shows and competitions, selection often focuses on animals that have placed in a class; **however any equine on an event premises is subject to random selection for sampling and testing.** Selections will be made as the horse exits the competition arena. The California Equine Medication Rule **does not** require collection of both blood and urine samples. Trained EMMP field personnel will collect urine samples from selected equines when an EMMP-approved California licensed veterinarian is not assigned to the event. When an EMMP-approved California licensed veterinarian is assigned to work with EMMP field staff at an event, **only** blood samples will be collected from selected equines. The field representative will notify selected individual of the type of sample to be collected. No other sample type will be permitted.

When an equine is selected, the owner, trainer, or designee must maintain control of the selected animal and take it to a location designated by the EMMP representative for sample collection. The EMMP field representative is not responsible for following or locating the selected horse. **It is the responsibility of the custodial agent of the selected horse to submit the horse for sample collection**. Failure to submit a selected equine to EMMP representative for sampling is a violation of the California law and will result in a notice of violation and a civil penalty of not less than $100 and not more than $10,000.

Once in the designated location, the individual must remove themselves from the immediate proximity of the animal and avoid any activities distractive to the animal. Any activity causing delay of sample collection, including but not limited to, schooling or training, lengthy cooling out period, or bandaging, shall be considered “non-cooperative.” Failure to cooperate with EMMP staff is a violation of the California law and subject to civil penalty of not less than $100 and not more than $10,000.

An EMMP priority is the safety of the public, the equine and EMMP representatives. An EMMP representative may officially release a selected equine without sample collection if the animal poses a safety risk. If a reasonable attempt to collect a sample is made without successful collection of a sufficient sample volume, EMMP field personnel will document the sample collection attempt and may officially release the selected equine.

Owners, trainers or designees have the option to serve as a witness during the time of sample collection, labeling, and sealing. The witness may sign the record of sample collection acknowledging observation of the collection procedure. A decision to not observe sample collection or to not sign the sample collection document, constitutes a waiver of any objections to the identification of the equine selected and the manner of sample collection, labeling and sealing. Failure to witness the collection procedure is not an acceptable defense for challenging the identity of the equine or sample collection procedures.

Drug Detection Investigations and Violations

EMMP personnel seal collected samples, maintain chain of custody and submit the samples for chemical analysis to the Kenneth L. Maddy Equine Analytical Chemistry Laboratory, Davis, CA. Laboratory reports detections of any substance in the sample. The chemical analysis of blood or urine is positive when a prohibited substance is found to be present in the sample or when a permissible substance is detected above the maximum allowable level. A positive chemical analysis shall be prima facie evidence that the substance was administered in some manner to the equine, whether intentionally or unintentionally, which caused it to be present in the sample at the time of competition or sale. According to the California Equine Medication Rule, the owner, trainer and consignor are responsible and accountable for the equine’s condition at the time of sampling.

When the chemical analysis of a blood or urine specimen is positive for detection of a drug or medicine, an EMMP investigation begins. Under the rule, the EMMP staff may take into account relevant factors to determine an appropriate penalty, including but not limited to, the pharmacology of the prohibited substance, past violations of the responsible party, previous penalties in similar cases and reliance on the professional advice of a licensed veterinarian. A letter and Notice of Violation (NOV) and civil penalty assessment is sent to the owner/exhibitor/trainer or consignor of the equine with the positive sample. Relevant evidence or information about the detected substance may be submitted to the EMMP within a designated timeframe. Submitted information is given consideration by EMMP in determining if the violation should be rescinded.

Individuals may request an Informal Hearing to contest a Notice of Violation within thirty (30) days of issuance of the Notice of Violation (NOV). Informal Hearing requests must be submitted directly to the California Department of Food and Agriculture Legal Department, Office of Hearings and Appeals located at 1220 N Street Suite 400, Sacramento, CA 95814. CDFA Legal Counsel assigns a Hearing Officer to the case and coordinates the hearing. The Hearing Officer provides the EMMP and the owner, trainer or consignor the opportunity to present their case. The Hearing Officer has fourteen (14) days to render a decision to release the case, to hold the violation in abeyance or to support the issuance of violation and civil penalty.

The type of drug detection and the background case investigation information are given consideration in the assessment of the civil penalty for violations.

- Civil penalties, of not less than $100 and not more than $10,000 for each offense, will apply to the owner, the trainer, or both the owner and trainer of an equine found to have a chemical analysis with a prohibited substance, more than one NSAID, or detection of a substance above the maximum permissible level in violation of the rule.
- The owner, trainer, or both owner and trainer may receive a suspension from all public shows and competitions for a period of not less than 90 days or more than one year for each violation.
- The owner of an equine found in violation of the rule may have to pay a penalty fee of $50.00 to the public show or competition, where the animal was sampled.
- If an equine sample is found in violation of the rule, the event manager of the public show or competition where the animal was sampled, may require owner forfeiture of all prize money, sweepstakes, trophies, ribbons and points won, in accordance with event organization by-laws.
- The contract of sale on an equine may be declared void at the buyer's discretion, if a sample obtained from the animal at a registered public sale is found in violation of the California Equine Medication Rule.

Drug Detection Civil Penalty Matrix

Minor ($100-500)	Moderate ($500-$2,000)	Severe ($2,000- $10,00)*
1st Offense Permissible Overage	1st Offense Prohibited Drug Detection	1st Offense Non Therapeutic Prohibited Substance
1st Offense Dual NSAID Detection	1st Offense Failure to Comply	2nd Offense Prohibited Drug Detection
	2nd Offense Permissible Overage	2nd Offense Failure to Comply
	2nd Offense Dual NSAID Detection	3rd Offense Permissible Overage
		3rd Offense Dual NSAID Detection

* Note: Additionally, suspension of owner, trainer or both from competition for 90 days to 1 year may be applied.

Veterinarian Responsibilities

When dealing with illness or injury of an equine at a public event in California, the veterinarian should administer or prescribe whatever is indicated for therapeutic treatment. The veterinarian administering or prescribing a prohibited substance should provide the owner, trainer or exhibitor guidance for withdrawal of the animal from competition to comply with the California Equine Medication Rule. Compliance with the California Equine Medication Rule is the responsibility of the owner and the trainer, who are thereby subject to the appropriate fines and penalties for violations.

Regulatory Authority

California Code of Regulations: Title 3 Division 2. Chapter 6. Sections 1280- 1280.10
§ 1280. Definitions.
(a) The following definitions are supplemental to the definitions specified in Food and Agricultural Code section 24001 and are used specific to this chapter:

(1) “Therapeutic drugs or medicines” means drugs or medicines prescribed for use by a licensed veterinarian for the treatment of a diagnosed illness or injury.

(2) “Permissible drugs or medicines” means therapeutic drugs or medicines or drugs and medicines found in a sample within the established maximum detectable plasma or urine levels.

(3) “Prohibited substance” means:

(A) Permissible drugs or medicines that exceed established maximum detectable plasma or urine levels;

(B) Therapeutic drugs or medicines used without a prescription for use by a licensed veterinarian for treatment of illness or injury; or

(C) Any stimulant, depressant, tranquilizer, anesthetic, including local anesthetic, sedative, analgesic, corticosteroid excluding dexamethasone, anabolic steroid, or masking agent administered within 24 hours before competition or 72 hours before public sale.

(D) Any anabolic steroid administered within 90 days before competition or sale.

(E) Fluphenazine or reserpine administered within 45 days before competition or sale.

§ 1280.1. Registration.
(a) Every public equine event or public horse sale shall be registered with the Department pursuant to sections 24001, 24012 and 24015 of the Food and Agricultural Code.
(b) The event manager is the “person in charge of an event”, including the person responsible for registering the event with the Department and the person responsible for the assessment, collection, and remittance fees, and is personally liable for fees and penalties, if any, owed to the Department.
(c) The following forms, which are incorporated by reference, are required to be completed and sent to the Department according to the instructions contained on the forms:

(1) Application to Register Equine Event/Assessment Report For Registered Event/Event Copy for Managers, Form 76-024A (Rev. 01/08), is required at least 60 days in advance of the event. A fee of $5.00 per horse entered per public show or sale must be assessed in accordance with section 1280.2 of these regulations. The assessment report must be submitted to the Department and fees remitted within fifteen (15) days after the final day of the event. Event managers are responsible for notifying the Department of Food and Agriculture of event changes or cancellations.
(2) Law Prohibiting the Drugging of Horses/Saleyard Assessment Report, Form 76-025 (Rev. 11/2013), must be filed by the sale manager within fifteen (15) days of the end of the month being reported. The assessment fee is $5.00 for each horse consigned for public sale pursuant to section 1280.2 of these regulations.
(3) Official Form For Declaration Of Drugs Administered, Form 76-027 (Rev. 11/13) or compatible document of the event-sanctioning organization, must be completed by a registered event exhibitor or consignor and filed with the event manager for any horse that has received a prohibited substance for therapeutic reasons within three (3) days before a show/competition or five (5) days before a sale.

(A) The owner/exhibitor/trainer is to submit the completed Form 76-027 (Rev. 11/13) or compatible document of the event-sanctioning organization to the event manager within one (1) hour if administration of the product(s) occurs at the event. If the product administration occurs at a time other than during show or sale hours, the owner or trainer should submit the completed form within one (1) hour after an event manager returns to duty.

§ 1280.2. Fees.

Beginning January 1, 2005, the applicable fee is $5.00 per horse entered per event, except where a horse is entered in simultaneous multiple events held as single performances, the total applicable fee per horse shall be $5.00.

§ 1280.7. Random Testing.

The Department will require random testing of horses exhibited or entered in any public horse show, horse competition, or public horse sale and shall designate the frequency and method of such testing by providing instructions to department personnel, approved California licensed veterinarians, and to laboratories performing analyses.
(b) An owner, trainer, both owner and trainer, or any person designated by the owner or trainer to maintain control of a horse randomly selected for examination by Department personnel shall:

(1) Take the selected horse without delay to a location determined by Department personnel for collection of the sample. Any activity causing delay of sample collection, including, but not limited to, schooling or training, lengthy cooling out period, or bandaging shall be considered “non-cooperative.”
(2) Remove equipment from the horse.
(3) Remove himself or herself from the immediate proximity of the horse.
(4) Avoid activities distractive to the horse.

§ 1280.8. Therapeutic Drugs and Medicines.

(a) Therapeutic drugs or medicines administered for purposes other than under veterinary

prescription for a diagnosed illness or injury are considered prohibited substances, and their use is a violation of this section.

(b) Horses administered therapeutic drugs or medicines for purposes other than under veterinary prescription for a diagnosed illness or injury shall not compete or be available for sale until the prohibited substance is no longer detectable in the urine or blood sample.

(c) A therapeutic drug or medicine is permitted when:

(1) A prohibited substance is administered more than 24 hours before competition or more than 72 hours before a public sale.

(2) The therapeutic drug or medicine, or metabolite of the therapeutic drug or medicine, does not interfere with the quantification of any permitted substance or detection of any prohibited substances as defined by Food and Agricultural Code section 24001(h).

(3) Only one (1) nonsteroidal anti-inflammatory drug (NSAID) is given. When two NSAIDs are in a therapeutic regime, one must be discontinued at least 72 hours before competition.

(A) When administered by a licensed veterinarian for the emergency treatment of colic or an ophthalmic emergency, flunixin, in addition to one (1) other NSAID, may be acceptable if found in the plasma or urine sample of a horse provided:

(i) The licensed veterinarian who administered the substances properly signs and files a drug declaration with the event manager or designee within one (1) hour after administration of the substances or one (1) hour after the event manager or designee returns to duty if the administration occurs at a time outside competition hours; and

(ii) The horse is withdrawn from competition for 24 hours or from public sale for 72 hours.

(4) The detected level in the sample does not exceed the established maximum detectable plasma levels for the following drug or medicine:

(A) 15.0 micrograms per milliliter of phenylbutazone.

(B) 1.0 micrograms per milliliter of flunixin.

(C) 2.5 micrograms per milliliter of meclofenamic acid.

(D) 40 micrograms per milliliter of naproxen.

(E) 0.240 micrograms per milliliter of firocoxib.

(F) 0.005 micrograms per milliliter of diclofenac.

(G) 0.250 micrograms per milliliter of ketoprofen.

(H) 0.0005 micrograms per milliliter of dexamethasone.

(I) 0.5 micrograms per milliliter of methocarbamol.

(5) The detected level in the sample does not exceed the established maximum detectable urine levels for the following drug or medicine:

(A) 0.09 micrograms per milliliter of dexamethasone.

(B) 350 micrograms per milliliter of methocarbamol.

(d) No injectable substance shall be given to a horse within 12 hours of competition except:

(1) A minimum of 1 liter of polyionic fluids per 100 pounds of body weight given therapeutically by a licensed veterinarian between 6-12 hours of competition. Therapeutic fluids with concentrated electrolytes, such as magnesium, are prohibited.

(2) Antibiotics, except procaine penicillin G, administered by a licensed veterinarian between 6-12 hours of competition.

(3) Dexamethasone, not to exceed 0.5 milligram per 100 pounds, administered by a licensed veterinarian between 6-12 hours of competition exclusively for the treatment of acute urticaria (hives). The total dose of dexamethasone administered within 24 hours shall not exceed 1.0 mg per 100lbs.
(4) The licensed veterinarian who administered the injectable substances in (d)(1) through (3) above shall sign and file a drug declaration [Form 76-027(Rev. 11/13)] with the event manager or designee within one (1) hour after the administration of the injectable substance or one (1) hour after the event manager or designee returns to duty if the administration occurs at a time outside competition hours.

§ 1280.9. Fines and Penalties

(a) Failure to comply with the provisions of this Chapter or Chapter 8 (commencing with section 24000) of Division 11 of the Food and Agricultural Code, constitutes a violation punishable by a fine of not less than one hundred dollars ($100) or more than ten thousand dollars ($10,000). The Department shall use the provisions of this section to determine the violation class and amount of the penalty.
(b) For the purposes of this section, violation classes are designated as “serious,” “moderate,” and “minor” to establish maximum penalty amounts. Repeat violations may result in an escalation of violation class. Serious and moderate violations may be downgraded based upon the evidence, the factual circumstances, mitigating factors and the cooperation of the violator.

(1) “Serious.” Violations that cause significant performance enhancement of the equine or deceptive business practices that involve the non-therapeutic use of a prohibited substance, repetitive use of therapeutic prohibited substances and repetitive failure to comply actions. Serious violations are punishable by a civil penalty of up to ten thousand dollars ($10,000) or suspension of a period not less than 90 days or no more than one year for each violation. The suspended individual is not permitted entry to event grounds of any registered event in the state of California during the suspension period. Event managers may not permit participation of a suspended individual in the registered event and event managers must immediately notify department of suspended individual’s presence of the event grounds.
(2) “Moderate.” Violations in which there is a potential for intermediate level of competitive harm or repeated violations of permissible level of detection and initial prohibited therapeutic substance detection. Moderate violations are punishable by a civil penalty of up to two thousand dollars ($2,000).
(3) “Minor.” Violations that are unintentional and have minimal performance enhancing action or equitable competition in the competition. Minor violations are punishable by a civil penalty of up to five hundred dollars ($500). In lieu of civil penalty, the Department may issue a notice of warning for minor violations.

(c) Table “A” Equine Medication Monitoring Program Violations Matrix is to be used to establish the level of severity of a particular violation and the corresponding penalty range for “serious,” “moderate,” and “minor” violation classes. (Email EMMP@cdfa.ca.gov or call 916-900-5039 to request Table “A” EMMP Violation Matrix)

§ 1280.10. Violations.

(a) Failure to comply with the provisions of this Chapter or Chapter 8 (commencing with section 24000) of Division 11 of the Food and Agricultural Code constitutes a violation punishable by a fine of not less than one hundred dollars ($100) or more than ten thousand dollars ($10,000).

(b) The Department may act consistent with any other existing enforcement authority concurrently or at a later date unless otherwise prohibited. Existing remedies include, but are not limited to, the following:

(1) Denial, suspension, or revocation of a registration or other indicia of authority issued by the Department;

(2) Suspension of the owner, trainer and/or exhibitor from all competitions at any public horse show or competition for a period of not less than 90 days or more than one year for each violation; and

(3) Suspension of the event manager from the management of any public horse show or competition for a period of not less than 90 days or more than one year for each violation.

(c) The Department may impose civil or administrative penalties, including, but not limited to, the following:

(1) Referral to the appropriate Office of the Attorney General for criminal prosecution or other appropriate remedy; and

(2) Reimbursement to the Department for any costs incurred due to any violation of this Chapter or Chapter 8 (commencing with section 24000) of Division 11 of the Food and Agricultural Code.

For Drugs and Medications Information:

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