STNE

Equine Nutrition Technical Platform

Certification reference for the marketing of feed for horses liable to be subject to a search for feed contaminants during anti-doping controls.

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1. General considerations

1.1 Scope of application

Equestrian sport meets current regulations.

Article L241-2 of the Sports Code stipulates that “It is prohibited to administer or apply to animals, during sporting events organised by approved federations or authorised by a delegated federation or specialist commission (…), or in view of participation in these events, substances or procedures that may artificially modify their capabilities or mask the use of substances or procedures with this property.

The list of substances or procedures indicated in this article is set by the joint ruling of the Ministers responsible for Sport, Health and Agriculture. "

Article L241-6 of the Sports Code stipulates that “An approved sports federation or the French Anti-Doping Agency may provisionally, temporarily or definitively prohibit, according to the modalities provided in section 4 of chapter II of title III of this book, owners or trainers of an animal to which a prohibited substance has been administered or a prohibited procedure applied from entering the animal in the competitions and events indicated in Article L. 241-2. "

The ruling of 2 May 2011 on the substances and procedures indicated in Article L. 241-2 of the Sports Code lists the substances liable to artificially modify the capabilities of animals involved in sporting activities.

The *Fédération Équestre Internationale* (F.E.I) and the Race Codes govern the world of horse racing. Within the framework of the F.E.I., anti-doping controls of horses are governed by several documents including the Prohibited Substances List. This list is divided into two sections: controlled medication substances and banned substances. If a substance has a similar chemical structure or biological effect to a substance on the list, it is also prohibited.

In France, the Race Codes (gallop racing code and trotting racing code) take precedence for horse racing. They prohibit all presence of “doping” substances during racing or training. They may go beyond the F.I.E.’s regulatory requirements or demands.

However, contaminants that are naturally present in certain inputs may be found in horse feed. These contaminants are Naturally Occurring Prohibited Substances (NOPS).

In parallel, the creation of the French Anti-Doping Agency (*Agence Française de Lutte contre le Dopage* - AFLD) led to an extension of controls to all sporting activities. Set up on 23 March 2006, the AFLD has competency in terms of animal doping to intensify controls of horses taking part in competitions in all disciplines and at all levels, in addition to racing.

The Race Codes define the conditions under which biological samples are taken and analysed.

The “Equine Nutrition” Technical Platform concerns the horse feed manufacturing activity, and notably the specific constraints related to the manufacturing of feed for horses liable to be subject to the search for feed contaminants during anti-doping controls.

The “Equine Nutrition” TP aims to define the specific requirements for the management, checking and monitoring of the manufacturing of horse feed in order to reduce this risk of feed contamination as far as possible.

The audit for STNE certification is an additional audit to OQUALIM's "Animal Nutrition Certification Reference" (RCNA) certification audit on the health safety and quality of animal feed or other references recognised as equivalent by OQUALIM.

The RCNA's requirements that have a direct impact on managing NOPS are explicitly repeated in this document.

1.2 Terms and Definitions

Inputs: Inputs in the text of this guide refer to all products entering into the composition of animal feed whatever its finality in the company - manufacturing, distribution or trading, i.e.:

- animal feed materials,
- additives,
- additive premixtures,
- processing aids,
- medical premixtures (V.4 of the RCNA)
- compound feed.

Sensitive input: An input liable to be contaminated by a NOPS.

Feed materials: products of vegetable or animal origin, whose principal purpose is to meet animals' nutritional needs, in their natural state, fresh or preserved, and products derived from the industrial processing thereof, and organic or inorganic substances, whether or not containing feed additives, which are intended for use in oral animal-feeding either directly as such, or after processing, or in the preparation of compound feed, or as carrier of premixtures (Regulation 767/2009).

Prohibited input: Input prohibited in horse feed as it naturally contains a NOPS in accordance the rules indicated previously.

Naturally Occurring Prohibited Substance: Substance prohibited by the Race Codes and known to be present in certain inputs or that occurs as a result of inadvertent cross contamination during harvest, storage or transport before arriving at the feed manufacturer's facility. These substances are listed in appendix 1.

2 Management of the risk related to NOPS

The feed quality/safety policy must include the commitment to meet the STNE.

2.1 Analysis of input risks

2.1.1 Risk analysis to identify sensitive inputs

The manufacturer must carry out a risk analysis on inputs used taking into account their origin, when this information is available, taking into account the NOPS and, if applicable, identifying sensitive inputs.
For information, a list of sensitive inputs, i.e. those liable to be contaminated by one or several NOPS can be found online at https://www.oqualim.com/fr/expertise/dossiers-thematiques/substances-dopantes-nutrition-equine.
If a risk is identified, the company must implement appropriate means for example, specific horse specifications, technical sheet, reinforced control plan, audits...

2.1.2 Sampling of feed materials

The samples of the feed materials entering into the horse feed must be stored for a minimum duration corresponding to the Best Before Date (DLUO) of the horse feed + 2 months.

2.1.3 Self-monitoring plan for inputs

The analytical monitoring procedures must take into account the monitoring of the absence of natural contaminants in the inputs destined for equine feed.
Based on an input risk analysis, the manufacturer determines the inputs on which they will carry out at least one analysis per year unless, to date, the search for the NOPS is technically impossible on the matrix.
In the case of multi-site companies, the self-monitoring plan can be pooled for feed material inputs common to the sites.

2.2 Analysis of process risks

2.2.1 Analysis of TIL risks

The identification of carry-over risks and the definition of the means to be implemented in order to limit them are specific to each production and storage tool for animal feed (feed materials and/or compound feed).
Succession incompatibilities must take into account that it is prohibited to manufacture a horse feed directly after feed containing a prohibited input, at all stages of manufacturing.

2.2.2 Managing TIL

a) When the feed is produced on a manufacturing site that uses prohibited inputs, horse feed must be considered as a sensitive species under the meaning of the TIL appendix.
b) Specific rules must be defined from the reception to the delivery/shipping of the finished products to prevent direct successions of inputs or horse feed after a prohibited input or feed containing a prohibited input.

2.2.4 Reprocessed/recycled products

In horse feed, only recycling from the manufacturing of horse feed is authorised. The traceability of the recycling must enable this requirement to be verified.

2.2.3 Identification and traceability

The operator implements an identification and traceability system that notably:

- Ensures traceability of successions of batches;
- Enables identification of each batch.

2.3 Analysis of finished product risks

2.3.1 Internal analytical monitoring for output animal feed

The procedures for analytical control must take into account the control of the absence of natural contaminants in the finished products destined for horse nutrition.

2.3.2 Sampling of finished products

a) Each batch of bulk feed delivered must be sampled, identified and stored for Best Before Date (DLUO) + 2 months.
b) The samples of each packaging batch of horse feed must be stored for Best Before Date (DLUO) + 2 months.

2.3.3 Verification

The internal audit procedures must take into account the additional requirements of the STNE.

2.3.4 Management of non-compliant products and customer claims

a) The procedures for managing non-compliant products and processing customer claims must include the specificities related to horse feed, including contaminants.

b) The withdrawal/recall procedures apply to horse feed containing natural contaminants beyond the defined thresholds.

3 Good practices

3.1 Competency of personnel

All of the concerned personnel must be trained in the specificities related to horse feed and to the management of the specific dangers in their position in order to ensure the safety of the horse feed.

3.2 Management of purchasing

a) A check of natural contaminants must be carried out prior to the referencing of a new supplier of a SENSITIVE input under the meaning of the risk analysis carried out by the feed manufacturer and/or prior to the incorporation of a new SENSITIVE input under the meaning of the risk analysis carried out by the feed manufacturer.

b) When the merchandise prior to an input for horse feed corresponds to a prohibited input, then level B of the Qualimat Transport cleaning specification must be the minimum requirement.

This requirement is in addition to the Qualimat Transport specification and must be specified in feed material supplier contracts or in an appendix transmitted to and accepted by the supplier.

3.3 Formulation

The specific constraints for equine nutrition (absence of prohibited inputs) and related to the risk analysis must be integrated into the formulation software.

For example: Constraints of maximum thresholds taking into account the risk analysis for the concerned sensitive inputs (threshold to be defined according to its risk analysis).

3.4 Delivery

In bulk horse feed, the transporters must be aware of the prohibited inputs for horse feed.

4 Management of the analyses

4.1 Interpretation of the results

The interpretation of positive results for NOPS must follow the calculation method presented in appendix 2 “Procedure for managing a positive result as part of the internal analytical plan framework”. Positive results are processed according to this management procedure.

4.2 Declaration of cases of non-compliance

The quantification beyond the admissible NOPS thresholds on inputs will be subject to reporting to OQUALIM according to the procedures described in appendix 3.