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The RMTC opposes the proposed Model Rules on Environmental Transfer, Medroxyprogesterone, and Cobalt. Below please find our assessment of each.

### **Environmental Transfer**

It is impossible to determine intent (or lack thereof) for, or source of, exposure to a given substance by its concentration in a sample. The assertion that the detection of a concentration of < 100 pg/mL for either betamethasone or dexamethasone is evidence of unintended environmental exposure lacks factual basis. Deliberate administrations of either substance can also result in concentrations < 100 pg/mL. Increasing the actionable concentration for betamethasone to 100 pg/mL would be permissive of a 9 mg intra-articular injection at <72 hours to a race. Likewise for dexamethasone, the increased threshold would be permissive of a 20 mg systemic dose at < 36 hours.

The RMTC supports the consideration of the facts of each case and mitigation of penalties when there is compelling evidence of unintended and unpreventable exposure from a horse's environment; it does not support a more permissive approach to the regulation of these potent corticosteroids.

### **Medroxyprogesterone**

A substance's absence from the ARCI's Uniform Classification of Foreign Substances does not establish as permitted or unregulated; medroxyprogesterone was not recently designated as a prohibited substance. Unclassified substances are assigned a default of 1/A if detected in an official sample. The RMTC determined that 1/A was not appropriate for medroxyprogesterone and therefore recommended a penalty classification of 3/B.

The RMTC recognizes that there is an extended—and unknown—clearance interval for horses treated with medroxyprogesterone. There are no published pharmacokinetic studies for medroxyprogesterone in horses; it is not possible to make a scientifically based threshold determination. As an alternative, regulators could consider a grace period during which horsemen would not be penalized for the detection of medroxyprogesterone in the post-race sample of an intact mare or filly. (A grace period is not warranted for the detection of medroxyprogesterone in a spayed female, colt, horse, ridgling, or gelding.) Horsemen wishing to race treated horses in jurisdictions that do not enact an enforcement grace period are advised to have horses tested prior to entry to ensure compliance with regulations.

### **Cobalt**

The RMTC stands behind its recommendations for the regulation of cobalt; the existing regulations have proved effective in controlling for the use of cobalt salts for which there is no therapeutic indication for use in the horse. One laboratory when queried reported that for 2020, 99.9% of test results were < 25

ppb; .08% were >25<50 ppb, and with no results > 50 ppb. The ARCI rulings database identifies 39 unique horses in the US that had cobalt concentrations in violation of the Model Rule since 2015. Of those, 10 had concentrations >25<50 ppb, which for a first violation is associated with a written warning and the horse's placement on the Vets' List pending testing results with a concentration < 25 ppb. Of the remaining 29 horses, the rulings recorded serum concentrations for 19. Of those, 12 had concentrations > 70 ppb; 7 had concentrations > 50 ppb but < 70 ppb. Considering the tens of thousands of cobalt tests conducted since 2015, testing results demonstrate that cobalt violations are avoidable and horsemen have overwhelmingly learned how to provide vitamin and mineral supplementation to horses in their care without running afoul of existing cobalt regulations.