

STAFF ANALYSIS

DISCUSSION AND ACTION BY THE BOARD REGARDING THE PROPOSED AMENDMENTS TO CHRB RULE 1867, PROHIBITED VETERINARY PRACTICES, TO ADD PIN-FIRING, FREEZE-FIRING OF SHINS, VESICANTS, AND COUNTER-IRRITANT INJECTIONS

Board Meeting
May 13, 2026

ISSUE:

The California Horse Racing Board (CHRB) is proposing amendments to its veterinary-practice regulations (CHRB Rule 1867) to prohibit pin-firing (thermocautery) of any structure, freeze-firing of shins (MCIII/MTIII), the application of vesicants (blistering), and the injection of any substance intended to create inflammation or a counter-irritant effect for any horse under CHRB jurisdiction. These procedures—historically used to treat dorsal cortical stress injuries (“shin soreness”) and other musculoskeletal issues—intentionally cause tissue damage to produce an inflammatory response. Contemporary evidence-based veterinary practice no longer supports these methods.

BACKGROUND:

Techniques like pin-firing, freeze-firing, vesicants (blistering agents), and internal or injectable counter-irritants have been under scrutiny for decades. These approaches were grounded in the early 20th-century belief that inducing intentional, acute inflammation at or near the site of an injury would stimulate the healing process of the underlying injury. What was standard curriculum in the early 20th century is now considered “archaic” and “unethical” and not taught in modern veterinary schools.

Modern diagnostic imaging, rehabilitative protocols, and evidence-based treatments have replaced the need for intentionally inflicting tissue damage to provoke inflammation. Counter-irritation—whether produced by pin-firing, freeze-firing, topical vesicants, or the injection of substances intended to cause localized inflammation—provides no proven therapeutic benefit and carries significant welfare risks, including pain, infection, scarring, and the potential masking of underlying pathology.

The American Association of Equine Practitioners (AAEP), in updated 2025 position statements, formally concluded that there is no scientific evidence supporting the use of pin-firing, vesicants, or internal blistering agents in the management of equine musculoskeletal conditions. The AAEP’s 2025 update is significant because it moved AAEP from a “non-support” stance to a more active opposition

These AAEP findings align with the federal Horseracing Integrity and Safety Authority (HISA) Rule 2271, which prohibits pin-firing of any structure, freeze-firing of the shins,

the use of vesicants as counter-irritants, and the injection of any substance intended to cause inflammation or a counter-irritant effect.

To ensure alignment with federal rules and contemporary veterinary guidance, the CHRB seeks to formalize a prohibition on these practices. The pin-firing and freeze-firing restrictions would begin with the 2026 foal crop.

CONTROLLING LAW:

Business and Professions Code (BPC) section 19440 (in part):

- (a) The board shall have all powers necessary and proper to enable it to carry out fully and effectually the purposes of this chapter. Responsibilities of the board shall include, but not be limited to, all of the following:
 - (1) Adopting rules and regulations that protect and advance the health, safety, welfare, and aftercare of racehorses.

BPC section 19562:

The board may prescribe rules, regulations, and conditions consistent with the provisions of this chapter, under which all horse races with wagering on their results shall be conducted in this State.

BPC section 19580 (in part):

(a) The board shall adopt regulations to establish policies, guidelines, and penalties relating to equine medication in order to preserve and enhance the integrity of horse racing in the state. Those policies, guidelines, and penalties shall include, at a minimum, the provisions set forth in this article.

ANALYSIS:

The proposed amendments to CHRB Rule 1867 are necessary to protect racehorse welfare, provide regulatory clarity, and ensure statewide consistency with contemporary veterinary standards and federal racing regulations.

Modern.Veterinary.Consensus;

The AAEP's 2025 position statements formally state that counter-irritant techniques, including pin-firing, freeze-firing of shins, vesicants, and internal blistering agents, lack scientific justification and are not supported in contemporary equine medical practice. The AAEP's 2025 Position.on.the.Use.of.Vesicants.expressly states that the organization does not support the use of vesicants or internal blistering agents, including injected substances intended to provoke inflammation. The AAEP reaffirmed that there is no scientific evidence that inducing inflammation or creating a counter-irritant effect through these injections provides any therapeutic benefit. These methods are

additionally characterized as posing significant welfare and ethical concerns, particularly when used to mask pain or artificially modify a horse's performance.

While the AAEP's vesicant statement historically focused on topical preparations, the 2025 updates make clear that the same scientific and welfare objections apply to injectable counter-irritants. The AAEP's contemporaneous Position.on.Soring.further underscores the ethical and regulatory problems associated with intentionally causing pain or inflammation through chemical means, reinforcing the broader principle that such practices are incompatible with acceptable veterinary care.

Alignment.with.HISA.Regulations;

HISA Rule 2271 prohibits pin-firing of any structure, freeze-firing of the shins, application of vesicants, and the injection of any substance intended to cause inflammation or a counter-irritant effect for thoroughbreds. The CHRB's proposed amendments mirror these federal prohibitions and apply them across all breeds racing in California. This ensures uniform standards for veterinarians, owners, and trainers and eliminates variation between state and federal requirements.

RECOMMENDATION:

This item is presented to the Board for discussion and action.

CALIFORNIA CODE OF REGULATIONS
TITLE 4. BUSINESS REGULATIONS
DIVISION 4. CALIFORNIA HORSE RACING BOARD
ARTICLE 15. VETERINARY PRACTICES PROPOSED AMENDMENT OF RULE 1867,
PROHIBITED VETERINARY PRACTICES

For purposes of this division, the following are prohibited veterinary practices means:

(a) The possession and/or use on the premises of a facility under the jurisdiction of the Board of any drug, substance, doping agent, or medication specified below for which a recognized analytical method has not been developed to detect and confirm its administration; or the use of which may endanger the health and welfare of the horse, or the safety of the rider or driver, or alter equine performance.

(1) Erythropoietin (EPO) and analogs;

(2) Darbepoietin and analogs;

(3) Venoms or derivatives thereof;

(4) Growth hormone and analogs and growth hormone releasing factor including growth hormone releasing hormone GHRH, and its analogs, except platelet rich plasma and autologous conditioned plasma, are permitted provided such treatment is pursuant to a valid veterinary prescription made in accordance with all rules and regulations in this division, and the treatment is reported to the Official Veterinarian on form CHRB-60 (Rev. 7/15) (Trainer Medication Report), regardless of whether or not the horse is treated within or outside of a licensed inclosure;

(5) Ractopamine and ractopamine metabolites or analogs;

(6) Zilpaterol and zilpaterol metabolites or analogs;

(7) Aminoimidazole carboxamide ribonucleotide (AICAR);

(8) Hemopure;

(9) Myo-Inositol Trispyrophosphate (ITPP);

(10) Oxyglobin;

(11) Thymosin beta;

(b) The possession and/or use on the premises of a facility under the jurisdiction of the Board of any drug, substance or medication that has not been approved by the United States Food and Drug Administration (FDA) for use in the United States.

(1) Possession or use of any compounded drug, substance, or medication shall not be considered a prohibited veterinary practice if:

(A) There are no other human or animal drugs approved by the FDA and available to satisfy the need for the compounded drug;

(B) The drug is compounded by a California licensed veterinarian or California licensed pharmacy in compliance with State and Federal laws and regulations;

(C) The drug is compounded for an individual animal patient and not used as office stock, unless the compounded drug is listed for use on horses on the FDA List of Bulk Drug Substances for Compounding Office Stock Drugs for Use in Nonfood Producing Animals; and

(D) The compounded drug is not a copy of a marketed FDA-approved or indexed drug, unless the compounder has documented the reason(s) why a marketed FDA-approved or indexed drug can be used as the source(s) of the active ingredients.

(c) A drug compounded pursuant to subsection (b) shall only be dispensed as follows:

(1) By the pharmacy, after receipt of a prescription for an individual animal patient from a veterinarian who has established a veterinarian-client-patient relationship, directly to the prescribing veterinarian or the animal patient owner or designee of the owner.

(2) By the veterinarian to the animal patient owner or designee of the owner.

(d) The presence of any drug, substance or medication described in subsections (a)(1) through (a)(11), and subsection (b) of this regulation in any test sample obtained consistent with Rules 1858, 1859, 1859.1, and 1859.25 of this article, and the provisions of this article, shall apply to such sample in the same manner as if the horse were entered to race (See Title 4, California Code of Regulations, section 1843.3).

(e) Pin-firing and freeze-firing of the shins (dorsal surface of the third metacarpal/metatarsal bones). Horses within the foaling year of 2026 or later shall not be allowed to participate in a race or a timed workout if their shins have been pin-fired or freeze-fired.

(f) Pin-firing of any structure. Horses within the foaling year of 2026 or later shall not be allowed to participate in a race or a timed workout if any structure on their body has been pin-fired.

(g) Application of any substance to cause vesiculation, blistering, or any physical disruption of the epidermis or surface of the skin.

(h) Injection of any substance to cause inflammation or a counter-irritant effect.