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
November 18, 2026

ISSUE

Following feedback received after the initial discussion to amend California Horse Racing Board (CHRB) Rule 1867 (Prohibited Veterinary Practices), the CHRB is proposing updated amendments to its veterinary-practice regulations to prohibit the use of counter-irritant practices on any racehorse under CHRB jurisdiction, including pin-firing (thermocautery), freeze-firing of shins, the application of vesicants (blistering), and the injection of any substance intended to create inflammation or a counter-irritant effect. Contemporary evidence-based veterinary practice no longer supports these methods.

BACKGROUND

The proposed amendments modernize CHRB Rule 1867 by eliminating outdated veterinary practices historically used to produce counter-irritation. Techniques including pin-firing, freeze-firing, vesicants (blistering agents), and internal or injectable counter-irritants intentionally damage tissue and are no longer supported in current equine medical practice. Guidance from the American Association of Equine Practitioners (AAEP) discourages these practices for lack of scientific evidence, and the proposed amendments bring California rules into consistency with those standards as well as those of HISA, which prohibits such treatments for thoroughbreds.

ANALYSIS

Since the Board reviewed draft language in May, staff has refined and clarified the proposed regulatory text. The updated draft language includes precise definitions for pin-firing, freeze-firing, and counter-irritant techniques; reorganizes these provisions for clarity; and ensures consistent terminology throughout the rule. The changes do not alter the underlying purpose of the proposal but rather enhance the clarity and regulatory consistency. The CHRB will request via the rulemaking process that these restrictions become effective on January 1, 2028.

RECOMMENDATION

Staff recommend that the board approve the proposed amendments as presented.

ATTACHMENTS

Proposed text of Rule 1867 amendments

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 ~~factory~~ factors 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 Trispyprophosphate (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<u>not</u> 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).

<u>(e) Pin-firing of any part of the horse's body. No horse shall participate in a race, as defined in section 1420, or workout, as defined in section 1878, if they have been pin-fired after the effective date of this subsection.</u>

(1) For purposes of this rule, “pin-firing,” also referred to as thermocautery, means the application of extreme heat to a horse’s skin and underlying tissues by use of a heated instrument to burn or cauterize a horse’s skin and underlying tissues, creating localized spots of heat damage intended to trigger an inflammatory response as a counter-irritant.

(f) Freeze-firing of the anterior surface of the third metacarpal/metatarsal bones. No horse shall participate in a race, as defined in section 1420, or workout, as defined in section 1878, if their shins have been freeze-fired after the effective date of this subsection.

(1) For purposes of this rule, “freeze-firing,” also referred to as cryocautery, means the application of extreme cold to a horse’s skin and underlying tissues, producing cryogenic lesions intended to create a counter-irritant effect similar to pin-firing.

(g) Application of any counter-irritant that causes blisters or that damages the outer skin layer or skin surface after the effective date of this subsection.

(1) For the purposes of this rule, “counter-irritant” means the application or injection of internal or external blistering agents to produce a localized inflammatory process often resulting in the formation of scar tissue with a decreased blood supply to the area.