

International Carriage Drivers Association

To: Károly Fugli, Chairman FEI Technical Committee Driving Manuel Bandeira de Melo, FEI Director of Driving

Copy: Committee members ICDA Competitors CAIO Aachen 2023

Subject: Proposed changes to the FEI Driving Rules

August 16, 2023

Dear Manuel & Károly,

The ICDA Committee has met to consider the proposed changes to the FEI Driving Rules and would like to provide you with a summary of the conclusions reached. Although ICDA is not yet an FEI stakeholder, the views do represent a cross section of the driving athlete community and we hope, therefore, are a valuable contribution to the discussions taking place. Committee members have followed up with their respective National Federations to ensure that these views are reflected in their feedback which is due by 16th August.

Article 911 – Principles: 10. Horse Welfare

ICDA is very supportive of the work of the EEWB Commission to bring greater focus to the issue of the need for increase standards of horse welfare and the importance of Social Licence in terms of the way in which driving sport is governed. The proposal to allow the President of the Ground Jury to eliminate a turn out at any point in competition if it were contrary to the principles of horse welfare is nonetheless a very significant increase in the powers vested in Officials. We note that the Proposed Wording has been adapted to refer to "the best interest of the wellbeing and/or safety of the Horse and/or Athlete". ICDA believes that the proposals from other disciplines which refer to elimination "if this would be in the best interests of the safety of the horse and/or athlete " provides a more objective means of determining elimination. ICDA also believes that these powers should not be delegated to anyone other than the PoJ, whom we believe should consult other members of the Ground Jury before eliminating a turnout.

2. Article 911.2 - Driving Recorded Warning

ICDA is very concerned at the simultaneous introduction of both the Horse Welfare provisions and the Driving Recorded Warning. It is not clear that in driving, there have been incidents which could not have been dealt with under the current rules and which therefore explain the significant changes in the sanctions regime. ICDA has consulted with Officials who share the view of ICDA members; namely that , as proposed, the new regime will be very difficult to implement. There is firstly no discretion for Officials to issue such Driving Warning Cards and the definitions of the offences are in many cases very subjective. "Driving too fast", "Electing to take dangerous or wild routes" "Repeatedly being late for proper cuing in upcoming turns" require much greater specificity given the very significant implications for athletes reputations and their future participation in the sport. Less experienced athletes will be discouraged from participating given that accidental actions are treated as severely as other offences. ICDA believes that Annex 10 needs to be withdrawn and redrafted as it does not provide the clarity to Athletes that it is claimed to do.

The powers, as proposed put a very significant amount of pressure on the President of the Jury. We believe it would only be fair to give the PoJ discretion with regard to the issuance of a Driving Recorded warning to enable a proportionate response to individual incidents.



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There is reference in several of the paragraphs to "stronger sanctions".ICDA believes that the Driving Technical Committee should spell out up front what those sanctions are.

3. Article 911.2 - Yellow Warning Cards

ICDA recommends that the TD should consult with and seek the agreement of the PoJ or Chief Steward before issuing a yellow Card

4. Article 933.2.4 - Welfare of the Horse

The proposed Horse Fall Rule (paragraph2.4) may well add to horse welfare concerns. Under the current rules the groom(s) dismount immediately, keep the horse(s) down until such time as they have been released from the carriage. Under the proposed rules athletes may encourage the horse(s) to stand up without assistance from the groom(s). This may cause an increased risk of an accident and will be perceived very negatively by spectators.

5. Article 927 - Additional Entries for Championships and CAIOs

ICDA believes that the decision to defer any decision on the entries for Pony World Championships until the rules review in 2025 will mean a whole generation of athletes will miss out on the opportunity to compete at the highest level. As the entries for the 2023 PWCs confirm there are a limited number of nations that can with any confidence field a team given the shortage of pony pair and pony team drivers. ICDA believes there is a strategic case to support the proposal from DEN to allow nations to field the same number of athletes in each class. We are aware that a number of other nations are submitting similar proposals and we hope the Technical Committee will recognise the strategic case for this proposal.

6. Article 961.5 - Dislodgeable Elements

It is a great pity that the proposed rule on dislodgeable elements has met with hostility since it was introduced as a Clarification in August 2022. ICDA recognises that the use of mobile obstacles provides OCs with much greater flexibility. The use of dislodgeable elements also provides an important argument to justify the social licence for driving sport. The pair and horse team athletes in particular feel that it would have been much preferable to consider this rule change in the context of the periodic rule review given the impact that the number of dislodgeable elements has on the scoring of the marathon. It would also have enabled some of the unforeseen consequences to be considered carefully. For example the increase in the number of mobile elements has increased speeds through the obstacles given the requirement for 3.5m gaps. This is not necessarily promoting safety. Most importantly the use of dislodgeable elements on every element is causing an increase in the number of errors which is hardly surprising given that there may be 25-30 balls on some obstacles. Athletes are being unfairly penalised and this is bring this rule into disrepute. ICDA supports the original proposal from NL to give the TD some discretion with regard to numbers as an interim measure pending further review when the periodic rules revision takes place.

ICDA hopes the above is a helpful contribution to the rules review for 2024 and would be happy to discuss the contents with you at your convenience.

Best regards. ICDA committee