

**Second submission from Fair Play For Women to British Cycling  
January 2023**

Please read this in conjunction with our submission of April 2021

**1. The failure to keep women's cycling events single-sex is already having a detrimental impact on women.**

Since British Cycling stated that its transgender policy was suspended on April 2022, Fair Play For Women has been contacted by numerous women who have found themselves racing males in unfair competitions run under British Cycling rules, by women who have raced males in other non-BC cycling events, and by women who have found that recreational events billed as being for women only were in fact mixed sex. Males with previously-issued female racing licences were competing in women's events. Males without such licences were competing in non-BC events.

None of these women objects to transgender people in their sport. They object to people who've been through male puberty, with its irreversible advantages, competing in events which are supposed to be for those who lack those advantages, namely females.

They also object to the total loss of single-sex events. Some competition and much recreational cycling can be open to all. There is also a need for female-only competition and recreational rides. This is not in dispute. Breeze rides were created for that reason. But the reality does not match up to the promise. When single-sex is indicated then that is what should be provided. Our previous submission gave examples of women who wanted single-sex recreational cycling events but who could not participate in Breeze rides because of male presence.

**2. The negative impact on women is being suppressed and under-recorded.**

Some of these women have raised their concerns with British Cycling. None has reported a satisfactory outcome, or any resolution of their complaints. There has been and continues to be unfair competition in which males are gaining podium places in women's events.

Some women who have told us of their concerns have not raised it with British Cycling. They are deterred by the Code of Conduct, fearing that they may be disciplined if they do so. They are also fearful of less formal forms of backlash: being called transphobic, or being encouraged to leave their club, for example. This effect is not unique to cycling but is widespread across sport, as documented in the Sports Council Equality Group (SCEG) project report, published in September 2021<sup>1</sup>.

**3. Women and girls cannot turn a blind eye to male presence.**

The issue is not trans identity, it is male presence. There are many reasons why women and girls may want female-only events. The presence of a male, regardless of gender identity, makes those events mixed sex. There are many attributes that indicate a male presence, such as voice, gait, face shape, hair growth patterns, body shape and overall size. Many of these remain unchanged in those with a trans identity. The ability to distinguish between the sexes is acquired early in childhood and appears to be instinctive and highly accurate<sup>2</sup>. It does not rely on sight of birth records or intimate body

---

<sup>1</sup>

<https://equalityinsport.org/docs/300921/Project%20Report%20on%20the%20Review%20of%20the%20Guidance%20for%20Transgender%20Inclusion%20in%20Domestic%20Sport%202021.pdf>

<sup>2</sup> <https://pubmed.ncbi.nlm.nih.gov/8474840/>

parts. It exists even if it is not recorded. The reality or possibility of a male participant makes a “women-only” event pointless and will deter some females from even turning up. This is not a criticism of or suggestion about trans-identifying people of either sex, just as preferring male-free spaces is not a criticism of or suggestion about any particular men.

#### **4. It is now beyond doubt that there is no known way to include males in female competition while protecting fairness for females.**

Since British Cycling’s previous consultation in April 2021, the Sports Council Equality Group (SCEG) has published revised guidance on transgender inclusion in sport (September 2021)<sup>3</sup>. This includes a comprehensive review<sup>4</sup> of the available scientific literature on male-female differences in sport and on the effects of testosterone suppression. The SCEG guidance concluded that:

“the inclusion of transgender people into female sport cannot be balanced regarding transgender inclusion, fairness and safety in gender-affected sport where there is meaningful competition.”

Please note that meaningful competition means competitive sport, governed by rules, in which outcomes are being measured and have some value to the participants and results are not predictable. It does not mean close competition or narrow margins, since this cannot be determined in advance of a competition. Instead, factors likely to influence performance are identified, and competitors grouped accordingly. Sex is one of the most determining factors, hence the norm for single-sex competition in most sports. Allowing both sexes into a competition intended for females makes it visibly unfair at the outset for the female competitors. This is regardless of who wins.

That is why the final page of the primary guidance document says:

“This Guidance concludes that for many sports, the inclusion of transgender people, fairness and safety cannot co-exist in a single competitive model.”

#### **5. Testosterone suppression does not remove male performance advantage.**

The SCEG project included a comprehensive review of the available scientific literature on the effects of testosterone suppression, concluding that it does not remove male performance advantage since many of the effects of male puberty are irreversible. These are fuelled by testosterone at puberty but not maintained by circulating testosterone in adulthood, therefore the reduction or removal of testosterone after puberty has only a limited impact.

Since the SCEG report was published, further studies have confirmed its conclusions, including one in which male subjects had been on testosterone suppression measures for up to fourteen years<sup>5</sup>. Furthermore, exercise reduces the loss of muscle mass among males suppressing testosterone<sup>6</sup>.

It is clear that it is not a question of finding the right testosterone limit, or the right length of time to require it. The performance advantages of male puberty are not reversible.

---

<sup>3</sup>

<https://equalityinsport.org/docs/300921/Guidance%20for%20Transgender%20Inclusion%20in%20Domestic%20Sport%202021.pdf>

<sup>4</sup>

<https://equalityinsport.org/docs/300921/Transgender%20International%20Research%20Literature%20Review%202021.pdf>

<sup>5</sup> <https://bjsm.bmj.com/content/56/22/1292>

<sup>6</sup> <https://pubmed.ncbi.nlm.nih.gov/36534950/>

## **6. Testosterone suppression policies cannot be administered below elite sport.**

Testosterone-suppressing medication has very short-term effects. A male who misses or skips it will experience the return of normal testosterone within days. Thus, occasional verification, even quarterly, is far from ensuring compliance. Like anti-doping measures, only random testing could do this. Yet grass roots sport has no such processes. It is entirely inappropriate to pass on a policy from elite sport that cannot be implemented in grassroots sport. Testosterone suppression does not remove male advantage, and cannot even be monitored effectively.

### **6. In practice, policies requiring registration or medical oversight can become self-identification.**

There are practical problems with testosterone suppression and registration of those subject to it, any one of which is enough to render the process hopelessly flawed. These apply in cycling, in some disciplines and events.

First, as outlined in 6. above, compliance is far from certain, since there is no mechanism to ensure it. A routine blood test arranged by the licence holder a few times a year is insufficient.

Second, the code of conduct acts as a deterrent to questioning or challenging any participant who might be thought to be trans. This means other participants are in effect gagged or may feel they are. A competitor can register for the first time as female and obtain a female licence, this avoiding the notional requirement of testosterone suppression.

Third, in some disciplines, below national level it is not the norm to ask to see race licences. As far as we know, training of officials has generally not included what to do if they see a competitor who looks as if they may be subject to some restriction such as testosterone suppression. To do so could be called transphobic. In those disciplines and events where licences are not routinely required, asking one competitor on these grounds would be difficult unless officials are trained, authorised and encouraged to do so by British Cycling. Clearly, the code of conduct encourages quite the opposite.

Thus, in some disciplines in cycling, outside of national events, the approach becomes self-identification, since neither officials nor competitors can draw attention to a trans competitor when this is not the norm for other competitors.

### **About Fair Play For Women**

Fair Play For Women Ltd is a campaigning and consultancy organisation which raises awareness, provides evidence and analysis and works to protect the sex-based rights of women and girls in the UK. Founded in 2017, our work is focused on those areas where gender-and sex-based rights conflict in law and policy making. Our aim is to ensure everyone's needs are fairly balanced and women and girls are not overlooked in good policy-making.

We believe in compassion and fairness for all. We support the rights of trans people to live in safety and to be treated fairly. We also support the rights of women and girls, and this is our focus. Protecting these rights in law requires that sex is not conflated with gender identity.

We are experienced policy stakeholder representatives acting on behalf of women and girls. To date we have been invited to engage in transgender sport policy meetings held by, inter alia, the IOC, World Athletics, World Rugby, Sport England, UK Sport, and by several national governing bodies in the UK. We have also been consulted on non-sport policy issues by MOJ, IPSO, EHRC, GEO, ONS and numerous private organisations.