August 26, 2016

The Honorable Tom Vilsack
Secretary of Agriculture
United States Department of Agriculture
1400 Independence Ave. SW
Washington, D.C. 20250

Re: Docket No. APHIS–2011–0009, Regulatory Information No. 0579–AE19; Horse Protection; Licensing of Designated Qualified Persons and Other Amendments, Proposed Rule

Dear Secretary Vilsack:

The American Veterinary Medical Association (AVMA) and the American Association of Equine Practitioners (AAEP) condemn the practice of soring to accentuate a horse’s gait for training or show purposes, and support the Animal and Plant Health Inspection Service’s ongoing efforts to enforce the Horse Protection Act (HPA). We applaud the U.S. Department of Agriculture moving forward with the Proposed Rule to amend the HPA regulations in ways that are necessary to protect the welfare of horses. However, it is our understanding that factions within the affected industries are requesting an extension to the comment period for the proposed rule. The AVMA and AAEP do not believe that there is reason to extend the comment period as it will only lead to unnecessary delays in the implementation of long-overdue changes and cause diminished welfare of more horses.

We are certain that these requests from the industry are intended only to stall implementation of the rule; a 60 day delay would ensure that the rule would not be implemented during the current Administration. Given the length of time that the current team at USDA has spent developing and proposing the rule, further delay is highly undesirable. The AVMA and AAEP are strongly committed to ending the practice of soring. After 40 plus years of effort - by us, other like-minded organizations, and the USDA - it’s past time for that to happen.

As one of the oldest and largest veterinary medical organizations, with more than 88,000 member veterinarians worldwide engaged in a wide variety of professional activities and dedicated to the art and science of veterinary medicine, the mission of the AVMA is to lead the profession by advocating for its members and advancing the science and practice of veterinary medicine to improve animal and human health. The Association has a long-term concern for, and commitment to, the welfare and humane treatment of animals. If you have any questions or require additional information, please do not hesitate to contact Dr. Cia Johnson, Director, AVMA Animal Welfare Division, at 847-285-6696 or via e-mail to cjohnson@avma.org.

Sincerely,

W. Ron DeHaven, DVM, MBA
Executive Vice President and CEO
American Veterinary Medical Association

David Foley, CAE
Executive Director
American Association of Equine Practitioners