January 19, 2017

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, Horse Protection; Licensing of Designated Qualified Persons and Other Amendments, Final Rule

Dear Secretary Vilsack:

On behalf of our nation’s veterinarians, who are committed to improving and protecting the health and welfare of all animals, we thank you for tirelessly pursuing development and adoption of a rule that will strengthen the Horse Protection Act (HPA) and safeguard horses from the cruel and inhumane practice of soring. The American Veterinary Medical Association (AVMA) and the American Association of Equine Practitioners (AAEP) have been united for decades in condemning the practice of soring, and gratefully acknowledge the efforts of USDA APHIS to seek reliable scientific evidence, consult with veterinary experts, and remain focused on serving the interests of America’s horses and the equine community.

Most recently, the AVMA and the AAEP have provided input to support strengthening the regulations and enforcement of the Horse Protection Act. We appreciate USDA’s acknowledgement and adoption of many of our suggestions including prohibitions on the use of action devices and non-therapeutic stacks or pads for Tennessee Walking and racking horses. We also noted incorporation of the requirement that inspectors be independent veterinarians and veterinary technicians, with degrees from AVMA Council on Education (COE) and Committee on Veterinary Technician Education and Activities (CVTEA)-accredited schools. We believe this requirement, when combined with APHIS training and licensing, will ensure horses participating in covered activities are inspected thoroughly and appropriately. We look forward to working with your agency to ensure that the new rule is thoughtfully and consistently applied and enforced.

Again, on behalf of the members of the AVMA and AAEP, we are deeply grateful for your persistence and determination to protect the health, welfare and integrity of these horses. It will be our honor to continue to partner with APHIS in all future efforts to protect the health and welfare of our nation’s walking and racking horses.

About the AAEP  
The AAEP, headquartered in Lexington, Ky., was founded in 1954 as a non-profit organization dedicated to the health and welfare of the horse. Currently, the AAEP reaches more than 5 million horse owners through its nearly 9,400 members worldwide (nearly 7,900 in the U.S.) and is actively involved in equine welfare and ethics issues, practice management, research and continuing education in the equine veterinary profession and horse industry.
About the AVMA
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, Animal Welfare Division, at 847-285-6696 or via e-mail to cjohnson@avma.org or Mr. Keith Kleine, AAEP Director of Industry Relations at 859-233-0147 or via e-mail to kkleine@aaep.org.

Sincerely,

Janet Donlin, DVM, MBA
Executive Vice President and CEO
American Veterinary Medical Association

American Association of Equine Practitioners
David Foley, CAE
Executive Director