



American Horse Council  
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## AHC submits another formal request to USDA on HPA regulations

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Honorable Brooke Rollins	Dr. Michael Watson	Dr. Sarah Helming
Secretary of Agriculture	Administrator	Deputy Administrator
USDA	USDA-APHIS	USDA-Animal Care
1400 Independence Avenue, S.W.	4700 River Road Riverdale, MD 20737	4700 River Road Riverdale, MD 20737
Washington, DC 20250		

February 27, 2025

Dear Secretary Rollins, Dr.Watson, and Dr. Helming,

The American Horse Council (AHC) requests that the United States Department of Agriculture (USDA) take the following actions regarding the Horse Protection Act (HPA) Amendments (FR Docket No. APHIS-2022-0004) in support of a fair, open, and comprehensive rule-making process.

- **Reopen a minimum 60-day comment period** for the Horse Protection Act (HPA) Amendments (FR Docket No. APHIS-2022-0004) as per Executive Order: Regulatory Freeze Pending Review: item #3.
- **Convene a listening session for stakeholders** prior to the drafting and publication of any amendments or new proposed rule.

- **Delay the implementation** of any final or amended rule by **180 days** after publication.

*If these requirements cannot be met, the American Horse Council demands the complete rescission of Horse Protection Act (HPA) Amendments (FR Docket No. APHIS-2022-0004).*

The AHC represents all aspects of the horse industry. The overwhelming majority of breeds and disciplines do not engage in the illegal and inhumane practice of soring. The amendments in their current form are a duplication of efforts as most equestrian disciplines self-regulate through strict rules, fines, and disqualifications to uphold the highest standards of horse care and welfare both during and outside of competition.

In its current format, the HPA updated rule impacts an estimated 50,000 equine events across the country annually. However, less than 1% of all events are at risk of having sored horses compete (per USDA Animal Care research). Moving forward with the amendments as they stand will cause irreparable harm to the entire industry.

**The horse industry universally supports ending the practice of intentional soring and improving equine welfare.**

The proposed rule fundamentally alters and extensively broadens the enforcement of preventing the *intentional* injury of a horse's limb and hooves to produce an exaggerated gait. Unfortunately, too much is left to USDA Animal Care interpretation and a lack of written protocols and clear instruction has put the horse industry in a position where compliance is currently impossible.

Given the lawsuits that have partially vacated the updated rule and the ongoing industry communications with the USDA Animal Care team since May 2024 (leaving stakeholders with *dozens* of unanswered questions regarding policies and procedures related to the rule), it is critical that USDA reopens the regulations for comment.

Postponing implementation of any amendments or newly published rules are critical. Stakeholders need adequate notice before enforcement efforts move forward.

If implemented, to truly be effective regulations require both clear USDA guidance and stakeholder input. Vague aspects of the amendments combined with a lack of USDA staff knowledge of functionality or appreciation for the nuances of differing disciplines has created a perfect storm for inconsistent policy guidance. A listening session would be a step in the right direction to educate USDA Animal Care on the operational considerations that must be made for a functional rule.

The published amendments are untenable in their current form. Extending the comment period, providing listening session(s), and delaying implementation should produce a clear and functional rule that addresses the intent of Congress in adopting the Horse Protection Act and the equine community and industry's desire to eliminate the intentional and illegal practice of soring.

If this is not possible, then the amendments must be rescinded.

The US horse industry contributes \$177 billion in value to the US economy, involves at least 7.2 million horses, and over 2 million horse owners in the US. On top of that, it provides 2.2 million jobs to Americans.

Thank you for your time. A response to our request within 30 days of receipt of this letter is essential for the industry to understand how it must proceed.

We look forward to your response.

Sincerely,

Julie Broadway

Julie M. Broadway, CAE®

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*The American Horse Council (AHC) is a U.S. advocacy organization based in Washington, D.C., that represents individual members, small businesses, and more than 130 equine organizations before Congress and the federal regulatory agencies. AHC member organizations include breed registries, national and state equine associations, state horse councils, recreational associations, and organizations representing racetracks, equestrians, horse shows, veterinarians, farriers, rodeos, and other equine-related stakeholders.*