



Comments in Response to:  
**Horse Protection Act Modifications**

The Horsemen's Council of Illinois is a statewide organization representing the entire horse industry and all equine in Illinois. HCI is a member of the American Horse Council.

**The Horsemen's Council of Illinois supports ending the unnecessary, cruel and inhumane practice of soring horses.**

In response to the failure to eradicate the practice of soring within some portions of the Tennessee Walking Horse (TWH), Racking Horse (RH) and Spotted Saddle Horse (SSH) breeds, the USDA/APHIS has proposed amendments to the Horse Protection Act of 1970.

Although supporting the concept of tightening regulations in order to finally eliminate soring from these breeds, the Horsemen's Council of Illinois has some reservations concerning the language proposed in several sections of the amendment document. Specifically, HCI is concerned with undefined terms that could negatively impact a number of horse breeds that have not, and actually cannot, sore horses to achieve an animated show gait.

A phrase of specific concern is "...Tennessee Walking Horse, Racking Horse, **or related breed that performs with an accentuated gait...**" No definition of "related breeds" or "accentuated gait" is provided. This phrasing could capture other, trotting, breeds such as the American Saddlebred, Morgan, Arabian, Hackney, Standardbreds, Foxtrotters, Mountain Pleasure Horses, National Show Horses, Pasos, Clydesdales and possibly other breeds within the regulations. Although these breeds do value a high-stepping animated gait, they are trotting breeds that have never had a recorded incident of soring; moreover, due to the mechanics of the gait, soring cannot achieve the enhanced gait objective that it might in Walking breeds. We suggest the definition of targeted breeds as "*breeds that do not also trot*".

Another poorly defined term of concern is "**Substance means any agent applied to a horse's limbs while a horse is shown ...**" This definition is so broad that it would potentially prohibit the use of inert substances such as fly spray, soap, talc and liniment. HCI suggests substitution of the term "*forbidden substance*" with an accompanying definition of a forbidden substance as "*any substance for which the MSDS indicates that irritation of the skin or mucous membranes is likely on contact.*" Again, this prohibition should be *restricted specifically to the TWH, SSH and RH breeds* that have demonstrated a history of soring.

The **prohibition of hoof pads, bands and weighted shoes** in the TWH, SSH and RH breeds is certainly understood and supported. Within these breeds, these devices can be manipulated to create, hide or accentuate soring and a consequent gait change. However, a number of other trotting breeds utilize pads, sometimes bands and weighted shoes without inhumane consequences to their horses. For example, bands are sometimes used in draft horses in order to anchor their large shoes to a weak hoof wall. Pads are used in a number

of trotting breeds, both therapeutically and in order to help accentuate gaits. These uses are not considered abusive. The American Veterinary Medical Association acknowledges that pads in and of themselves are not cruel. We suggest that this prohibition be specifically identified as *“applying only to the TWH, SSH and RH breeds.”*

Changes proposed to the current system of inspection/inspectors include **limiting HPIs to licensed veterinarians and veterinary technicians** plus those who have no personal or familial ties to horse showing, judging or farrier servicing the TWH, SSH or RH breeds. We are concerned that this could severely limit the pool of potential inspectors and negatively impact the ability of a horse show to operate. For example, many farriers service a number of breeds, and the fact that they service some TWH, RH, SSH, but may not specialize in shoeing these breeds, could potentially exclude an otherwise qualified HPI candidate who is related to this farrier. Would a veterinary technician related to a part-time judge working a small open show in which TWH, SSH or RH breeds participate eliminate that potential HPI from the candidate pool?

Currently, show management pays a single DQP approximately \$200/day plus travel expenses. One concern then becomes how many veterinarians and/or veterinary technicians who meet the exclusionary requirements will want to go through the licensing process annually for very little return. There is already a shortage of equine veterinarians in the US; we are concerned that limiting the HPI pool to veterinarians and veterinary technicians would create a shortage and thus affect horse shows.

In anticipation of a critical scarcity of qualified, trained and licensed HPIs, we suggest APHIS **establish an alternate pool from which additional HPIs may be drawn** should a scarcity develop. Dedicated, incorruptible horsemen with a wealth of experience and knowledge of horses, gaits and lameness identification are a valuable resource in fighting soring and are being eliminated from the pool of potential HPI candidates.

The definition of an equine event in which notification of APHIS must occur (30 days in advance) is not made clear. In events and exhibitions where a few gaited breeds perform, but where there is no competition or prize awarded (for example the numerous, multi-breed Horse Fairs, Expos and similar exhibitions) there is no incentive for soring. Under the proposed rules, would these events need to choose between going through the process of notifying APHIS or excluding TWH, SSH and RH breeds from their all-breed exhibition?

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