

September 6, 2016

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Dr. Kay Carter-Corker
Assistant Deputy Administrator, Animal Care, APHIS
4700 River Road Unit 84
Riverdale, MD 20737

Re: Docket No. APHIS-2011-0009, Horse Protection: Licensing of Designated Qualified Persons and Other Amendments

Dear Dr. Carter-Corker,

I am commenting on behalf of the Humane Society Veterinary Medical Association (HSVMA), which represents approximately 9,000 veterinary professionals nationwide, in support of the above-referenced proposed rule. USDA has an obligation to effectuate the humane purposes of the Horse Protection Act, yet current regulations allow the ongoing use of cruel devices and techniques that perpetuate soring. The proposed rule bans the use of pads, stacks, wedges, hoof bands, action devices, and substances on the limbs of any Tennessee Walking Horse, and Racking Horse, or related breeds. This is a long-awaited change that we, as veterinary professionals, whole-heartedly support.

The Big Lick is a pain-based gait: it cannot be produced without soring. Chains, stacks, pads, bands, and heavy shoes are all integral to the soring process; without them, soring can't be accomplished and until they are prohibited, soring will continue. Equine lameness expert Dr. Tracy Turner, who the USDA commissioned to provide guidance on soring, has stated that devices like chains, pads, and hoof bands currently permissible under the regulations are commonly used to cause debilitating pain and suffering in walking horses. The final rule should contain a limit on the weight of the shoes that are allowed to be used on a Tennessee Walking Horse, Racking Horse or related breed.

Trainers use these devices -- chains, stacks, pads, heavy shoes, and bands -- to create and exacerbate inflammation in horses' limbs: this inflammation is the source of the pain that creates the Big Lick. Tall, heavy stacked shoes change the natural balance of the horse, causing structural changes that can be difficult, if not impossible, to reverse.

APHIS notes in the proposed rule that "[a]bout 90 percent of the alleged violations documented at shows from FY 2010 through 2015 involved horses wearing pads." APHIS also noted that research has shown that raising a horse's heel alone (as is done with pads and wedges used in performance packages), even with no other soring techniques, results in inflammation in a horse's tendons. Additionally, the chains used in the show ring would be entirely purposeless on a horse that had not already been subjected to pain caused by other training techniques or caustic chemicals that cause

pain/inflammation. Without having caused pain or inflammation, these devices would not cause the dramatic gait exaggeration we see in Big Lick horses.

There are a multitude of “performance” animals and associated competitions. The Big Lick is the only example where the goal is to render the animal less sound. From runners to jumpers to dressage to cutting to endurance, soundness of the horse is key. Forcing a horse to unnaturally support more of its weight on its rear limbs while walking holds no benefit for the horse. I question what we are really measuring when people seek to do this – what quality is being honored with ribbons at horse shows that celebrate this gait?

The HSVMA applauds and encourages the proposed rule as a step towards more humane horsemanship.

Walking horse industry organizations have had ample opportunity over the past forty years to propose and implement changes that would eliminate soring, but have failed to do so. The current sixty day public comment period is more than enough time for stakeholders to submit input on the rule. We strongly urge you not to extend the comment period on this long-overdue rule, and to move quickly upon its closure on September 26th to finalize the rule during this Administration.

Sincerely,

A handwritten signature in dark ink, appearing to read 'm. blackwell', with a stylized flourish at the end.

Michael Blackwell, DVM, MPH
HSVMA Board of Directors