

**Statement for USDA Meeting to Discuss Revisions to the Horse Protection Act
Lexington, KY.- August 09, 2016**

Statement:

As the oldest and largest national association serving the farrier industry and the only one in the US with an internationally recognized Certification program which sets a standard for excellence in hoof care, the American Farrier's Association commends the USDA for its current proposed efforts to eradicate soring, however, we also have serious concerns about at least two of the current provisions recommended for revision.

Specifically, citing statements included in references # 1 and # 2 below, the "Retitling of section 11.2 as "Prohibited actions, practices, devices, and substances" to prohibiting **all** (AFA emphasis) action devices, pads, and substances applied to a horse's limbs. AFA leadership feels strongly that without specific qualifying language for the prohibited devices this proposed revision would be much too broad and vague. For example, a horseshoe could be considered an action device, since a shod horse moves differently from a horse that is barefoot and various shoes have a greater influence on movement than others. And a pad can be applied with good reason to protect an unusually sensitive solar surface with the end result being a more comfortable horse rather than one previously in distress.

Regarding paragraph #3 in references cited below calling to remove the current provision in section 11.7(a)(2) which permits farriers meeting the requirements currently contained within section 11.7 (a)(2) to serve as DQPs(to be renamed HPI's) and state, instead, in paragraph (a) of revised 11.6 that only veterinarians and veterinary technicians may be licensed as HPIs :

AFA leadership feels strongly that due to the wide variance of expertise in equine podiatry amongst veterinarians, as opposed to farriers for whom this is their focus of training, it would be deeply concerning not to have an APHIS licensed farrier accompany a veterinarian at equine events where monitoring is indicated. Seeking the primary expert hoof care opinion from a veterinarian or veterinary technician who does not make hoof care their primary focus of practice is akin to asking a general practitioner in human medicine to evaluate a complex surgical procedure. It would be unthinkable. A highly competent farrier has extensive knowledge in equine anatomy, biomechanics, and kinesiology. Their focus is on hoof care that contributes to and maintains the wellbeing of the horse. And their working knowledge of the factors that contribute or detract from this wellbeing is unparalleled.

References from USDA Documents: 1.Retitling § 11.2 as "Prohibited actions, practices, devices, and substances" to prohibiting all action devices, pads, and substances applied to a horse's limbs. 2. From the summary of major provisions:" Changes we are proposing to the regulations include amending the regulations to prohibit use of pads, substances, and action devices on horses at horse shows, exhibitions, sales, and auctions"3. "We would also remove the provision in current § 11.7(a)(2) that farriers, horse trainers, and other knowledgeable horsemen can be qualified as DQPs if their past experience and training qualifies them for positions as horse industry organization or association stewards or judges (or their equivalent) and if they have been formally trained and licensed as DQPs by a horse industry organization or association. **Instead, we would state in paragraph (a) of revised § 11.6 that only veterinarians and veterinary technicians may be licensed as HPIs.** We are making this change to ensure that inspectors have the professional education, working knowledge, technical and practical experience, and training necessary to inspect horses properly under the Act and regulations.

