



For Immediate Release:

Lexington, KY –

The National Walking Horse Association (NWA), a leading advocate against abusive and inhumane treatment, is a USDA certified Horse Industry Organization (HIO). NWA has been committed to protecting the welfare of the Tennessee Walking Horse and providing an equitable flat-shod horse show affiliation program in which they may be exhibited, judged and showcased in full compliance with the Federal Horse Protection Act of 1970.

NWA is the only walking horse association to be recognized as an alliance partner of the United States Equestrian Federation (USEF). Our rules are and have always been structured and strictly enforced to protect the welfare of the horse. NWA also promotes educational and recreational activities while preserving the unique qualities of the Tennessee Walking Horse – based on sound principles and sound horses. The NWA members are proud and dedicated to showcasing the flat-shod, naturally-gaited walking horse at its very best. Member horses are humanely trained and exhibited.

As a flat-shod organization, the National Walking Horse Association is in full support of the elimination of pads and chains, with the end goal of eliminating soring as a whole for our industry. We fully support the spirit and intent of the Proposed 9 CFR 11 Ruling, with a focus on the naturally-gaited flat-shod horse. We have given great consideration and thought to every component of the Proposed Ruling.

With that in mind, the NWA presents the following comments, concerns and proposals based on the Proposed Ruling. We encourage our members and the sound horse industry supporters to review the following comments and share your thoughts during the comment period.

Proposed paragraph	Verbiage	Comment	Proposed Change
11.1 & 11.2 (b)	"Substance means any agent applied to a horse's limbs while a horse is shown, exhibited, or offered for sale, or otherwise present on the grounds at any horse show, horse exhibition, or horse sale or auction. This definition also includes any agent applied to a horse's limbs before or after a horse is shown, exhibited, or offered for sale, or otherwise present on the grounds at any horse show, horse exhibition, or horse	The term "any agent" is quite broad in definition; which could include items such as fly spray.	Suggest renaming to "any numbing or caustic agent...."



	sale or auction."		
11.2 (a), etc.	"...is specifically prohibited with respect to any Tennessee Walking Horse, Racking Horse, or related breed that performs with an accentuated gait..."	The terminology "accentuated gait" in combination with "related breed" is used repeatedly throughout the Proposed Ruling document, and can incorporate other breeds besides Tennessee Walking or Racking horses.	Change language to read "non-trotting breeds that perform an accentuated gait"
11.2 (a)(3)	"The use of any weight on horses, except a keg or similar conventional horseshoe, is prohibited."	<p>The NWHHA is extremely disappointed in this arbitrary "clarification" for several reasons. First, the Horse Protection Act was established to end soring. We have not been provided, nor are we aware of, any scientific evidence that a conventional steel shoe weighing more than 16 ounces causes a horse to be "sore". We do not understand what problem set this clarification is attempting to address and strongly believe that it is out of the scope and responsibility parameters of the Horse Protection Act. The last minute addition of this requirement in addition to the lack of justification and evidence provided by APHIS leads us to question the motivation and purpose for this requirement.</p> <p>Second, the NWHHA</p>	Completely remove this new "clarification" and revert back to the original proposal of "up to 2 years old."



		<p>allows weighted shoes of various size with the largest being a 1/2 x 1 1/2 inch conventional steel shoe. Our exhibitors successfully show these horses with sound training practices. Our DQPs are expertly trained to inspect locomotion and both physical and visual signs of pain. The NWHAs record of compliance speaks for its ability to protect its horse.</p> <p>Third, weighted shoes make up 4 of the 6 walking horse divisions the NWA promotes. Removing half of our divisions would effectively cut our membership in half. We are one of the strongest sound horse HIOs in existence. Is it truly APHIS' intent to slash our membership base and potentially put one of the strongest sound horse associations out of business?</p>	
11.2 (4)	"Artificial extension of the toe length is prohibited."	The intent of artificial extension of the toe length is an important area to consider, however, even flat-shod, naturally-gaited horses can have foot issues or lose a shoe, in which material is necessary to balance the hoof and soundness of the horse.	Change language to "Artificial extension of the toe length on more than one foot is prohibited." Add five inch toe limit.



		NWHA has been successful in limiting the use of an artificial toe extension to one foot only. NWHA also limits toe length to five inches in order to further discourage unnaturally long toes that may need artificial bolstering.	
11.3	"The scar rule applies to all horses born on or after October 1, 1975."	Any horse born prior to 1975 would not be able-bodied to participate in any type of event. We suggest removal of this line.	Delete line and start with "Horses that do not meet the following scar rule criteria shall be considered "sore"..."
11.5 (c)	"No tack other than a halter and lead rope may be on the horse during inspection."	This a major safety concern for attendees, exhibitors and other horses in attendance at an event of any type. Presenting a horse during inspection in simply a halter and then requiring it be bridled in an active warm up ring will cause accidents for exhibitors, attendees and horses alike. This IS A HUGE safety issue. Depending on the facility and show, there are a number of activities taking place and can be chaotic often. This proposal would require an exhibitor to remove or drop the halter to bridle the horse in an active warm-up area, with a number of other horses in the process of warm up and saddling. Saddling in the warm-up ring has created enough issues in many cases, and in fact, diminished and	Strong consideration given to modifying this language and requirement and changing wording to: "A horse will be presented in a bridle only."



		<p>discouraged older exhibitors from participating at all. There is simply too much congestion and activity swirling around to require the halter and lead rope presentation. Exhibitors and spectators, as well as the horses, will experience great risk. The NWHHA is adamantly opposed to this section of the proposed ruling.</p>	
<p>11.6 (a)</p>	<p>“Persons licensed as HPis under this part shall be veterinarians or veterinary technicians.”</p>	<p>There are a number of underlying issues with this section. First, currently DQPs are fully trained to detect practices of soring and pressure shoeing through hands on training and a thorough apprentice program. The suggestion that HPis could be trained via Computer-based training is unwise and frankly foolish – and will allow soring techniques to once again flourish. Pure knowledge and hands-on experience rule in this category. Holding a veterinarian license of any type does not qualify a person to be able to detect and determine whether a horse is sore or pressure shod. Proper training and hands on technique must be considered here.</p> <p>Secondly, the financial impact to current events</p>	<p>Reconsider the proposal of HPis; requirement for veterinarians or veterinary technicians. Or set a standard, not to exceed fee based on true and real industry data and figures. This must include availability of an HPI within 200 miles of affiliated events and shows. Absolute re-evaluation of requirement on training; must be hands on; conducted by knowledgeable industry experts. Little consideration has been given to the compliance track record demonstrated by the National Walking Horse Association, as a</p>



		<p>and horse shows must be carefully considered. Today, current NWA DQPs are paid \$200/day, plus mileage and rooming. Requiring a veterinarian or vet tech to conduct inspections has the high potential to significantly increase costs to a show. Extensive and true data and evaluation must be gathered and analyzed to ensure not only the daily rates, but also the reasonable availability of these selected and/or approved HPis. Without proper consideration and evaluation, this proposed section could very possibly keep the majority of shows from being held. Today, show managers can demonstrate and provide data on the rising costs to hold a show; this includes increasing facility rentals, decreased participation and other associated costs. Many of the NWA affiliated events are run by local clubs or individuals, on shoestring budgets, with little profit margins to spare.</p>	<p>sound and naturally-gaited HIO. And frankly this is one the greatest disappointment in the entire proposed ruling; with this proposed language, the ruling has intentionally or unintentionally lumped the NWA sound HIO in with every other organization/HIO with pads and chains or without. Since 1998, the NWA has been in compliance with the HPA and CLEARLY demonstrated our ability to hold and maintain a sound and compliant record. This must be reconsidered.</p>
<p>11.6 (b)(2)</p>	<p>“APHIS will not license any person as a HPI if that person, any member of that person's immediate family, or that person's employer participates in the showing of horses or acts as a judge</p>	<p>As stated above, the NWA has legitimate concern with the HPI approach. This requirement effectively limits the pool of available HPis even</p>	<p>Suggest a complete re-evaluation of this proposed section. Requirements must include a full review of the NWA compliance track</p>



	<p>or farrier, or is an agent of show management involving any Tennessee Walking Horses, Racking Horses, or related breeds.”</p>	<p>further. Many people have become DQPs under the current program, not for the \$200 a day, but because they believe in the program, have a vested interest in the sound horse and want to stop soring atrocities. Again, the NWAHA has maintained an outstanding compliant track record. APHIS will have a difficult time finding a large enough cadre of HPIs to fulfill the needs of horse shows at a reasonable cost to the show.</p>	<p>record and a possible consideration of the NWAHA processes. At a very minimum, this requirement must allow for a broader scope of qualifications for HPIs, a solid and true cost evaluation, supported by relevant data and analysis as well as a documented list of available and properly trained pool of HPIs across a broad range of regional areas.</p>
<p>11.6 (c)(2)</p>	<p>“After a HPI candidate successfully completes the formal training program in paragraph (c)(1) of this section and passes a written examination, a license will be granted to that candidate for 1 year. Licenses terminate after 1 year and all HPIs must submit a new application each year if they wish to be considered for licensing for another year.”</p>	<p>As mentioned above, computer-based training and a written exam are simply paper exercises. There is no mention of additional training requirements, hands-on learning, and apprenticeship under an approved/licensed HPI or licensed NWAHA DQP. The classroom licensing is simply unacceptable; and will promote a surge of soring and pressure shoeing techniques. This is an extraordinarily dangerous section of the proposal with great potential detriment to our entire breed.</p>	<p>Suggest a complete reconsideration of this section and requirement for training and licensing.</p>



<p>11.10(a)(1)</p>	<p>“(1) Notify the Administrator of the event at least 30 days before it begins...”</p>	<p>Today, no requirement exists for show management to notify APHIS of any horse show or event. This is currently handled by the DQP Director. This requirement places additional burden on shows; with any gaited classes, whether at a national, regional or local level – 30 days in advance. For those with knowledge and experience managing or planning an event – this is yet another deterrent for current or future shows or events.</p>	<p>Suggest removal of this requirement.</p>
<p>11.10(c) (1)</p>	<p>“The management of any horse show, horse exhibition, horse sale or auction that designates and appoints APHIS-licensed HPIs to inspect horses must designate and appoint a minimum of 2 HPIs if 150 horses or fewer are entered in the event.”</p>	<p>A range of 0 to 150 horses is quite large. Most one-day shows have approximately 30 horses and two-day shows don't usually see more than 50-60 horses. Requiring two HPIs for the majority of NWAHA shows is not only excessive, but it is cost-prohibitive for the shows that are barely covering their costs. In many cases, requiring two HPIs will put the show in the red and most managers will opt to not hold the show at all. We don't believe the intent of this proposed section is to eliminate the showing and participation in the NWAHA events, however if not carefully reviewed and appropriately</p>	<p>Suggested rewording: "appoint a minimum of 2 HPIs if 75 horses or more are entered in the event."</p>



		handled, the potential is quite high.	
11.10(c) (1)	“The management must also make a farrier available to assist in inspections at every horse show....”	<p>This requirement has severe impacts as well – both cost, availability and knowledge. Farriers receive anywhere from \$80 to \$180 to reset shoes on one horse, depending on the region. Committing to an all-day or multiple-day horse show or event, causes the farrier to lose a lucrative day of work where they could shoe 5 – 8 horses. In many cases, farriers are not willing commit to an event unless they are well compensated for it to make up for their loss of income.</p> <p>In addition, similar to veterinarians or vet techs, many farriers outside of the walking horse industry, have little to no knowledge in detecting or understanding soring or pressure shoeing. Some regions may have an abundance of knowledgeable gaited horse experience; however this is a small grouping of specific regions. Similar to the</p>	<p>A solid review of this proposed section is required – backed by cost, availability and a knowledge assessment or training is strongly recommended. Suggested at a minimum rewording: “The show management must also make a farrier available to assist in inspections at horse shows with 100 or more horses.”</p>



		HPIs, an in-depth analysis of cost, availability and knowledge or training must be considered in this section.	
11.11 (a)	“The show management shall maintain for a period of at least 6 years following the closing date of the show, exhibition, or sale or auction, all pertinent records containing..”	This is a function that the current HIOs conduct and are equipped to maintain. The NWAHA currently maintains a large space and numerous cabinets for this type of activity and requirement. Requiring show managers to maintain this data for 6 years is excessive and cumbersome. It is important to understand the typical show manager – usually a small local club or in many cases the show manager is a single individual.	This proposed ruling outlines a number of areas that increases the responsibility on show management to execute and financially support events across the country. Again, we suggest a true understanding and analysis of show managers, their processes and the willingness and ability to execute and maintain these new requirements. And although we believe the intent is not to discourage sound, naturally gaited events; implementing requirements like this could have enormous detriment to our breed and participation. At a very minimum, Suggest changing the requirement to 2 years.
11.12(2)	“Whether a horse is presented for inspection, its custodian shall present the HPI with a record or entry card that includes identifying information about the horse...”	This requirement needs some additional consideration. As mentioned many times, this proposed ruling burdens show management unnecessarily throughout	Strong consideration to removal or re-evaluation of this requirement.



		the proposed requirements. Has there been consideration to who is responsible for making, maintaining or distributing this card and information? How is this information collected, housed and stored? Is there a process outlined to determine whether the HPI has reviewed the information being presented? Additional knowledge, processes and consideration must be given if a requirement like this is put into place.	
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To reiterate, the National Walking Horse Association is in full support of the elimination of pads and chains, with the end goal of eliminating soring as a whole for our industry, but the above listed issues are of concern and could have devastating impacts on our sound organization and the ability of most shows and events to continue to operate.

In addition, for the NWHHA, our profits are generated primarily from events and shows. If there is a reduction in our profit-generating events and margins, this affects far beyond our shows. We utilize our profits to grow and generate other areas of our organization; our gaited dressage program, versatility events; competitive trail riding programs, educational grants and sponsorships and so much more.

We certainly understand and applaud the efforts to eliminate soring from our industry – our mission statement is based upon these tenets. However, this ruling must take into consideration the other requirements and impacts on our industry and organizations like the National Walking Horse Association who have raised the bar in sound horse compliance.

We urge our members, the industry, the USDA and all other relevant parties to truly understand the full scope and implications of every proposal and requirement outlined as a part of the Proposed Ruling.