



February 12, 2007

Dr. Freeda Isaac, Staff Veterinarian
National Center for Import and Export, VS, APHIS
Docket No. APHIS-2006-0013
Regulatory Analysis and Development
PPD, APHIS, Station 3A-03.8
4700 River Road Unit 118
Riverdale, MD 20737-1238

Re: Docket No. APHIS 2006-0013

Dear Dr. Isaac:

The American Horse Council (AHC) appreciates the opportunity to comment on the proposed rules to establish permanent, privately-owned horse quarantine facilities. The AHC is the national association representing all segments of the horse industry in Washington, D.C. The AHC includes over 160 organizations and 1,200 individuals representing every facet of the horse world – from owners, breeders, trainers, veterinarians, farriers, breed registries and horsemen's associations to horse shows, racetracks, rodeos, commercial suppliers and state horse councils.

With a total of 9.2 million horses, the U.S. horse industry is a \$102 billion industry that supports 1.4 million full-time jobs. There are 4.6 million Americans involved in the industry as horse owners, service providers, employees and volunteers; and tens of millions more participate as spectators.

The U.S. horse industry is an international one and increasingly more foreign horses are being brought into the U.S. for racing, showing, sale, breeding and pleasure. Often there are not enough quarantine spaces to accommodate them all. The need for additional quarantine space has increased dramatically and more facilities are needed to handle the additional commerce. The AHC supports the establishment of permanent, privately-owned horse quarantine facilities for permanent entry horses to address the growing need for additional import quarantine facilities.

There are a few items that we would like to strongly emphasize. First, it is imperative that APHIS personnel be present at these privately-owned facilities in order to provide the continuous oversight and technical assistance necessary to ensure the biological security of the facility. The AHC also stresses the importance that the establishment of these permanent privately-owned quarantine facilities would have no affect on the temporary, privately-owned quarantine facilities. These temporary facilities are an important resource to the horse industry and have worked well. We recognize that this is addressed within the proposal, stating that the

proposed rule would not affect the current USDA regulations that allow the approval of temporary, privately-owned quarantine facilities for horses imported for specific events, such as certain races or shows. We simply wish to re-emphasize its importance.

Though the AHC is in favor of the establishment of permanent, privately-owned horse quarantine facilities, we do have some concerns with the proposal as written. One of the major concerns is that of potential locations for such facilities. As written, the guidelines as to where a quarantine facility may be located vis-à-vis the port of entry are vague. Though we recognize the Departments' reasoning for not specifying how far a facility can be located from a port of entry, we are concerned with your decision to leave the approval up to the Administrator without any minimal guidelines on the distance of the facility to the port of entry. We feel that a lack of standards for the location of such a facility could be potentially dangerous and could cause problems for USDA in the future. For example if there is a quarantine facility within a state with no viable airport to ship the horse, and the horse is refused entry at the quarantine facility upon arrival, complications could arise when transporting the horse interstate to have it shipped out of the country. We ask that you re-consider the development of clearer limits for the location of these facilities from the port of entry.

Additionally we are concerned with the distance a quarantine facility may be from any premises holding livestock or horses. We suggest that you re-instate the requirement that a facility must be located at least one-half mile from any premises holding livestock or horses.

Another comment we have is regarding vaccinations. We feel that vaccinations should be permitted during the quarantine period as long as blood has already been taken for import testing. We do not see any risk that this would pose in affecting the diagnostic serology.

The concerns expressed by the horse industry are associated with the ability to ensure the safety and well-being of our horses and the protection from foreign animal diseases, a top priority of the industry. The introduction of an exotic equine disease to our 9.2 million horses would not only have a devastating effect on the equine industry but on the rest of the country as well. This being said, we do appreciate and support the USDA's important effort to respond to the industry's growing need for additional import facilities through privately-operated stations.

Thank you for the opportunity to comment on this proposal and for your careful and serious consideration of these comments. If further information is desired, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads "James J. Hickey, Jr." with a stylized flourish at the end.

James J. Hickey, Jr.
AHC President