



November 5, 2010

Dr. Angela Pelzel  
Western Regional Epidemiologist - Poultry, Equine  
USDA APHIS Veterinary Services  
2150 Centre Ave, Bldg B, Mailstop 3E13  
Fort Collins, CO 80526

Re: National Equine Piroplasmiasis Working Group  
Long-Term Recommendations – April 2010

Dear Dr. Pelzel:

### **Introduction**

The American Horse Council (AHC) appreciates the opportunity to submit these comments to the Equine Piroplasmiasis Working Group (EPWG) regarding the April, 2010 Long-Term Recommendations. The horse industry is very concerned with the recent outbreaks of equine Piroplasmiasis (EP) and their effects on the welfare of U.S. horses and the economic viability of the horse industry. It stands ready to support any efforts to prevent, diagnose, control and eradicate this disease from the U.S.

The American Horse Council (AHC) is a Washington-based association that represents the horse industry before Congress and the federal regulatory agencies. The AHC includes individual members and 160 equine organizations representing all horse breeds and virtually every facet of the horse industry, including owners, breeders, veterinarians, race tracks, horse shows, rodeos, farriers, breed registries, horsemen's associations, commercial suppliers, recreational riders and state horse councils.

### **Economic Value of the Equine Industry**

The U.S. horse industry is a \$102 billion industry that involves activities in all regions of the country. It is an important part of the U.S. livestock industry. According to The Economic Impact of the Horse Industry in the United States, a 2005 study done by Deloitte Consulting for the American Horse Council Foundation, the industry has a total economic impact of \$102 billion on the U.S. economy, supports 1.4 million full-time jobs, and involves over 4 million Americans who pay nearly \$2 billion in taxes each year. The study also estimates the horse population in this country has reached 9.2 million horses, with approximately 3.9 million involved in recreation, 2.7 million in showing, 845,000 in racing and the other 1.7 million involved in work and other activities.

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By itself the breeding and training segment of the industry has a total economic impact of \$6 billion on the economy, supports 100,000 jobs and involves 425,000 horses.

Forty-five states have a population of at least 20,000 horses.

The AHC's Government Affairs Advisory Council and Health and Regulatory Committees, along with others in the horse industry, were asked to review the EPWG recommendations. This group includes breed registries, national organizations representing various equine disciplines and activities, veterinarians and equine researchers. The following comments reflect the feedback that we received from them.

### **General Comments**

The AHC recommends that the EPWG include several representatives of the equine industry. We believe that the inclusion of individuals who work within, or are directly employed by, the horse industry would provide the EPWG with important, practical input that could make these excellent recommendations even better. It would also make it likely that there would be more immediate support from the horse industry.

The EPWG recommendations cover many areas and are very detailed. Obviously, a great deal of good work by the EPWG went into preparing these recommendations.

While the recommendations are generally characterized as long-term, it may be helpful to divide them into time categories, such as short-term, mid-term, and long-term, to provide some direction on what actions should be undertaken first. Some actions and investigations should be undertaken initially to deal with short-term problems. Others are important, but less pressing. In addition, it is difficult to be definitive on all the recommendations before definable risks have been determined. For example, we suggest that more research be done on potential tick vectors before undertaking some of these recommendations. But whatever is undertaken must be supported by sound science.

The EPWG may wish to prioritize the recommendations and undertake them in the following order to provide some logical progression through the process. The AHC suggests that the EPWG's recommendations be characterized as short-term, mid-term, and long-term. Short-term recommendations are those which should be initiated within the next six months, and mid-term recommendations are those that should be started anytime after 6 months and before 18 months. Long-Term recommendations are those that should not be undertaken within the next 18 months.

#### **Short-term Recommendations:**

- 1.1.1
- 1.4.1
- 1.5.1
- 2.2.1

2.2.2  
2.2.3  
4.1.1

Mid-term Recommendations:

1.2.1  
1.6.1  
2.2.4  
2.3.1  
3.1  
4.2.1  
5.1.1  
5.3.1  
6.1  
7.1  
7.2

Long-term Recommendations:

1.3.1  
2.1.1  
4.3.1  
4.3.2  
4.4.1  
4.4.2  
4.4.3  
5.2.1  
5.2.2  
5.2.3  
6.2  
6.3

**Specific Comments**

1.2 Recommendation – Official Identification of Confirmed EP-Positive Horses

The EPWG recommends that APHIS-VS and state authorities require the official identification of confirmed EP-positive horses using both ISO-compliant Radio Frequency Identification Devices and visual ID, including lip tattoo or freeze/hot brand on the left neck or shoulder of the horse.

The AHC supports the identification of confirmed EP-positive horses with an ISO-compliant RFID. The AHC feels the recommendation to officially ID EP-positive horses

should be mandatory. The industry has a need and desire to identify and control EP-positive horses until future recommendations addressing long-term management of EP-positive horses are in place.

The microchip is the most effective medical process for identifying EP-positive horses because it minimizes the potential for further iatrogenic transmission. We would like to note, however, some questions regarding microchipping. For example, if a positive horse has previously been microchipped, but the chip is not ISO compliant, must it receive another that is? In addition, efforts are underway to develop other identification methods, particularly the Iris scan, to identify horses. The EPWG might consider future technological advancements as alternative means for ID.

Additionally, limiting official ID methods to microchips alleviates the concern of permanently marking EP-positive horses with visual identification and reduces the potential for permanent loss of value, should a way be found to permanently clean up these infected horses in the future. As a practical matter the ISO compliant microchip is likely the appropriate form of permanent ID for EP purposes at this time. The AHC supports it.

But the AHC opposes permanent visual ID, either lip tattoo or brand, to identify EP-positive horses. The AHC appreciates the EPWG's sensitivity to the various positions on permanently marking EP-positive horses with visual identification. But a visual ID, such as the lip tattoo or freeze/hot brand lends itself to the spread of the disease itself to other horses because it can be transmitted through contaminated instruments. Indeed, evidence generated in the various investigations undertaken by federal and state authorities suggests that one of the ways the disease was spread was through the use of contaminated instruments and tools. Why require a process that could spread the disease?

### 1.3.1 Recommendation - Movement of EP-Positive Horses

This recommendation advises against intra-state movement of EP positive horses, but suggests intra-state movement be permitted under state control and only under a compliance agreement signed by the horse owner, state animal health authority, destination premises owner, and equine event organizer, if movement is to an event. The AHC is not opposed to this recommendation in principle but suggests that the requirements and conditions in any "compliance agreement" be spelled out with more specificity. For example, the AHC recommends that such a compliance agreement include a specific protocol that outlines the restrictions on movement, containment, biosecurity safeguards, and conditions of use of the horse at the facility or event.

If the event involves both horses coming intrastate and interstate then all of the participants should be informed along with the State Veterinarian of any other states from which horses come. Everyone involved must be advised of the participation of EP-positive horses so they can make informed decisions and take appropriate precautions.

Current federal regulations prohibit the interstate movement of EP positive horses, except for the current three exemptions that specifically permit it. The AHC supports

maintaining that federal prohibition on interstate movement

#### 1.5.1 Recommendation - Other Guidance for Investigation and Management of EP-Positive Horses

The AHC supports the preparation and distribution of guidance for the management of EP-positive horses for the states and others in the horse industry, including procedures to mitigate spread, standard operating procedures and other guidance on inspection and control, and guidance on the breeding of EP-positive horses. With respect to providing such guidance for the industry, the AHC recommends that a communication plan be drafted, with the assistance of industry organizations, to ensure the broadest and most efficient methods of education are used. Without the specific involvement of industry organizations, any such education and communication will be difficult.

The AHC supports the EPWG's guidance and recommended protocols for the breeding of EP-positive horses. EP-positive stallions should be bred to EP-negative mares only by artificial insemination. EP-positive mares should only be bred by artificial insemination. The mare owner should be fully informed of the transmission risk of EP to the foal, and foals born to EP-positive mares should be tested. For interstate transport of semen from an EP-positive stallion, the State animal health official in the receiving State should be notified of the shipment. Pre-breeding and post-breeding EP-testing of the mare is also recommended.

#### 1.6.1 Recommendation - Treatment Research Program Enrollment Package

USDA currently allows EP-positive horses to be enrolled in an approved treatment research program. The AHC supports the EPWG recommendation expanding this program and creating an enrollment package which will include treatment costs, potential side effects, and other information to facilitate an informed decision by a horse owner regarding whether he/she would want to enroll his/her horse(s) in the program.

#### 2.1.1 Recommendation – National Surveillance of EP

The EPWG recommends that a national surveillance effort not be undertaken at this time. Rather APHIS-VS should continue to support the states in their efforts to find EP-positive horses and any new surveillance initiated by the states, equine events, and the industry. But a national surveillance effort should be re-evaluated as the situation evolves.

The AHC strongly supports this recommendation. It is too soon to undertake a national surveillance effort. Other than the EP outbreak that occurred in 1962 in Florida, it is only in the last year that the prevalence of EP has been really questioned and even this outbreak, which has prompted the concerns, is somewhat localized. Neither the industry, federal authorities nor state authorities are prepared to undertake a national surveillance effort at this time.

While it is important to fully understand the depth and prevalence of EP within the US

horse population, the AHC supports the EPWG's recommendation not to pursue a national surveillance at this time. Before such a program is undertaken, it is important to explore and expand the options currently available for EP-positive horses. Currently, USDA-APHIS, state animal health authorities, and the industry do not have the infrastructure in place to manage and address the potential number of EP-positive horses that may be detected under a national EP surveillance plan. In addition, the AHC believes that it is better to use the funding that would be required to undertake such surveillance for other purposes, such as additional research into national tick surveillance, eradicating the disease, or cleaning up EP-positive horses so they may reenter the general equine population.

The AHC is also concerned that there is still a lack of industry-wide understanding of this disease and the industry buy-in that would be required to support any national surveillance plan at this time. Without a high percentage of participation, the findings of the surveillance plan would likely not be a good representation of the presence of EP in the U.S. horse population, and the surveillance plan would not justify the significant investment of funds, resources, or personnel.

This surveillance is an effort that should be initiated at some point, but we have not yet reached it. Such surveillance is better deferred until other steps are initiated and completed.

#### 2.2.2 Recommendation – Standardized Testing Form for EP

The AHC supports the EPWG recommendation that USDA-APHIS should work with the National Assembly of State Animal Health Officials to approve a standardized testing form for EP. This would expedite the implementation period. The AHC appreciates the need for a standardized test chart, similar to an EIA test chart. We recognize that this would also benefit events and facilities checking the identity of a horse to corroborate the negative status of a horse being presented at the event or facility and minimize the impact on business continuity and interstate and international movement of horses.

#### 2.2.4 Recommendation - Surveillance

As the EPWG recommendations point out, various states, events and industry organizations are currently considering whether to require EP testing. Indeed at least one equine organization is fairly far along in this process. The AHC supports the EPWG recommendation that calls on USDA-APHIS to develop guidance on available EP tests, sample collection and submission, along with a list of laboratories approved to do the tests. The more accurate information available, the more likely that the equine industry can effectively handle, control and hopefully eradicate this disease.

#### 3.1 Recommendation - Education and Outreach

The EPWG recommends an aggressive education and outreach program directed at owners, trainers, veterinarians, the industry, and state and federal regulatory officials. The EPWG suggested that specific targets include the Quarter Horse racing industry and

owners of imported sport and show horses.

The AHC supports this recommendation. The knowledge within the equine community regarding this disease, its management, and prevention and research findings must be expanded through the distribution of present and new materials. Indeed, some literature is older and out-of-date. Only the latest data should be used to educate the horse industry.

While USDA-APHIS may have the primary responsibility to lead this education effort, the horse industry, particularly equine veterinarians, must be involved from the beginning. Horse owners, breeders, events and facilities, service providers and particularly national organizations must be directly involved.

#### 4.1 Recommendation - Research on Treatment of EP

The AHC supports the recommended collaboration between APHIS-VS and ARS in Pullman, WA to research and develop a chemotherapeutic regimen for T. equi-positive horses, similar to the prior research conducted in successfully clearing various strains of B. caballi.

The AHC applauds ARS for prior and current success in researching and developing treatments for B. caballi. The AHC feels the increased number of T. equi-positive horses identified under the current outbreak calls for continued and enhanced research within ARS.

Irrespective of the welfare and economic issues incurred by horse owners, current resources allocated by State and Federal animal health authorities solely for response and management of T. equi-positive horses justifies enhanced research within ARS in Pullman, WA. The AHC supports the EPWG's recommendation and encourages APHIS-VS to work with ARS to continue and enhance current research relating to B. caballi and T. equi.

#### 4.2 Recommendation - Research on Transmission and Epidemiology of EP

The AHC supports continued and enhanced research collaboration between APHIS-VS and ARS on the transmission and epidemiology of EP in the U.S. As a foreign animal disease, EP has not traditionally been a focus of equine diseases in the U.S., and as a result, prior research undertaken by ARS has been conducted with minimal resources and modest inter-agency and industry collaboration.

The current outbreak of EP, beginning in October 2009, has altered the landscape and perspective of EP in the U.S., and requires a multi-faceted response by state, Federal, and industry personnel to control and mitigate the welfare and economic implications of the current EP outbreak.

The AHC considers enhanced research on the transmission and epidemiology of EP to be a cornerstone in any multi-faceted response and a prerequisite to implementing any

economically viable management tactic or effective disease mitigation strategy.

#### 4.3 Recommendation - Research on Prevention Strategies

The AHC supports enhanced collaboration between APHIS-VS and ARS Pullman, WA and ARS Kerrville, TX to undertake further research and development of tick vaccines and longer-acting acaricides for use on horses.

The industry acknowledges additional and continued education and outreach is an important component in implementing any advances such research may produce. The industry is prepared to undertake a considerable role in this process and stands ready to assist in whatever capacity is needed to ensure valuable research is incorporated into best-management practices.

#### 4.4 Recommendation - Research Continuation and Funding

The AHC supports increasing, or at the very least maintaining, current research capabilities and funding for the ARS research projects involving EP conducted in Pullman, WA.

The AHC recognizes the importance and magnitude previous EP research has provided in arming the industry, state, and Federal animal health officials in responding and managing the current EP outbreak. The industry further acknowledges the impact on the welfare and economic viability of the U.S. horse industry would be much more severe without the prior EP research conducted by ARS.

It is essential that the ARS is afforded future additional resources to continue researching and developing additional tools and capabilities to protect the welfare and economic viability for the U.S. horse industry. The AHC is currently involved in discussions to identify current and future industry resources and implement industry cooperative action on funding future EP research.

The AHC also supports additional funding come in the form of competitive research in order to maximize each aspect of national research funding. Supporting research through a competitive process will encourage collaboration and partnerships between USDA, academia and industry, and it will enable a more coordinated and integrated support of high-impact inter-disciplinary research as more resources can be allocated to fund a number of related projects.

##### 5.1.1 Recommendation - Entry of Horses from Canada

Under current U.S. and Canadian regulations, horses may enter Canada, complete an EP complement fixation test and an immunofluorescent antibody test (IFA) then after 60 days enter the U.S. without any additional test for EP. That same horse, if entered directly into the U.S. would have to undergo cELISA testing, which the U.S. began using in 2005. This is a much more accurate test.

The identification of an EP-positive horse imported from Canada has highlighted the different diagnostic testing requirements of the U.S. and Canada with respect to import requirements for EP. The AHC is concerned the complement fixation test (CFT) and immunofluorescent antibody test (IFA), which Canada is currently using for EP import testing, produces a greater range of error and results in increased false-negatives and false-positives than the cELISA test.

The AHC also sees strong epidemiological and economical justifications for encouraging uniformity in EP import and export testing between the U.S. and Canada to maintain an EP-free status in the two countries.

The AHC supports the EPWG recommendation that USDA discuss this difference in testing with the Canadian Food Inspection Agency in order to have Canada adopt the newer test to maintain EP-free status of the two countries. As long as Canada continues to use this old and less accurate test, U.S. horses are at risk because horse owners are allowed to do indirectly what they cannot do directly.

## 5.2 Recommendation - Entry of Horses from Other Countries

The EPWG recommends that USDA consider the need to require microchips in all imported horses at the time of entry for future traceability purposes, such as in the case of trace back for EP, CEM, or other foreign animal diseases. As the AHC reads this recommendation it would apply to all horses imported into the U.S.

While the AHC recognizes the importance and value of microchipping horses, we believe that requiring all horses entering the U.S. be microchipped is too strict at this time and would have a chilling effect on individuals who might wish to bring horses into the U.S. Tens of thousands of horses are brought into the U.S. each year, permanently and temporarily, for sale, breeding, racing, showing, exhibition, competition and trail riding. While many of the horses from the European Union may be microchipped, horses from Canada and Mexico are not. Moreover, there is no present requirement that U.S. horses be microchipped. Until there is, we suggest that this may be too strict a requirement and would lead to fewer horses entering the U.S.

In addition, other ID methods are being considered by various horse organizations to identify horses, including Iris scans. They are less invasive and may be more accurate and inexpensive. The AHC does not believe it is appropriate at this time to request USDA-APHIS to consider requiring the microchipping of all horses entering the U.S.

### 5.2.3 Recommendation - Records of Port Personnel

The EPWG recommendations point out what the AHC considers a flaw in one of the first lines of defense protecting U.S. horses from disease, the various ports of entry to the U.S. Horses denied entry at one port have gone “port shopping” and entered at another because personnel at the various ports currently have no way of identifying horses denied entry elsewhere. This is a serious breach of the important protections port inspectors provide.

The AHC supports the EPWG recommendation that USDA consider the need for port personnel to record official identification (digital photos, RFID) on all horses presented for import and have that information available to all agency port personnel in a standardized database.

### 5.3.1 Recommendation - Illegal Movement of Horses from Mexico

The EPWG recommendations note that investigations of EP outbreaks since 2009 have suggested evidence of illegal movements of horses from Mexico to the U.S. that were subsequently connected to EP-positive findings or outbreaks. EP is endemic in Mexico, and the illegal movement of horses from Mexico poses a significant threat of EP transmission to U.S. horses.

The EPWG recommends USDA discuss this concern with other Federal agencies that are responsible for activities along the U.S.-Mexico border and what actions might be undertaken to reduce the illegal movement of horses from Mexico. The AHC supports this recommendation.

### 7.1 Recommendation - National Perspective and Disease Status of the U.S.

The recommendations note that although unprecedented numbers of EP-positive horses have been found in the U.S. since the current outbreak in October 2009, the outbreak is neither widespread nor endemic in the general U.S. equine population. For this reason the AHC urges that the response to these EP findings focus on maintaining the EP-free status of the U.S. The EPWG recommends that EP continue to be responded to as a foreign animal disease in the U.S.

Clearly, the current EP outbreak is far more significant than originally anticipated. However, due to the comprehensive pre-outbreak research conducted by ARS in Pullman, WA and the extensive response and control measures taken by State and Federal animal health officials, the current EP outbreak has been limited to only three equine sub-populations. Those sub-populations include the index premises, horses imported prior to August 2005, when the CFT was the official import test, and a subpopulation of the Quarter Horse racing industry. On-going investigations and epidemiological evidence continues to demonstrate the current EP infection is neither widespread nor endemic in the general U.S. equine population.

The AHC strongly supports this recommendation that APHIS-VS and the states continue to respond to domestic EP findings as incursions of a foreign animal disease (FAD). And that EP continue to be classified as a FAD and the U.S. retain its EP-free status. It would be detrimental to the industry to lose this EP-free status and would negatively impact our position with many of our trading partners. It would make it substantially more difficult for horses to move internationally for sale, breeding, competition and recreation. This loss of movement would have an adverse effect on the viability of the U.S. industry. Before any change is made to the EP-free status of the U.S., the AHC recommends that further information be documented regarding the level and area(s) of natural tick vectors and the prevalence of EP-positive horses in the U.S.

The AHC appreciates the opportunity to submit these comments to the EPWG. If you have any questions about them or need additional information, please contact us.

Sincerely,

James J. Hickey, Jr.  
President