



The Honorable Sonny Perdue
Secretary of USDA
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

May 1st, 2020

Dear Secretary Perdue,

The American Horse Council on behalf of the hundreds of equine associations, small businesses, horse owners, and millions of horse enthusiasts across the country, requests your help with an urgent and persisting issue within the U.S. Department of Agriculture. We specifically request an opportunity to meet with you to discuss the following concerns.

Based on the 2017 Equine Industry Economic Impact Study conducted by the American Horse Council and American Horse Council Foundation, we found that the horse industry contributes \$122 billion a year to the US economy annually on the backs of 7.2 million horses. The value of live horse exports exceeds \$400 million annually, greater than the value of all other live animal exports combined (cattle, pork, sheep and goats). Additionally, the industry employs 1.5 million Americans and a third of all U.S. households has a member that is a horse enthusiast. Horses play a vital role in equine assisted therapies, with programs becoming increasingly popular with physically and emotionally challenged Americans, especially veterans.

Horses are considered livestock by the USDA as the federal code lists horses with traditional food and fiber species. While public perception of horses may have changed since the advent of the automobile, it should be emphasized that the management, care and transportation of horses is similar to that of other livestock species. From the viewpoint of feed, waste disposal, diseases, space considerations and culture, horses are separate from the pet or companion animal sector. The horse industry is comparable fiscally to other species in the livestock sector, equating favorably to the beef industry's \$165 billion a year, the 550,000 jobs within the pork sector, and

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the 5.2 million sheep in production. The number of farms with equids, based on the USDA definition of \$1,000 or more of sales of agricultural products, was 504,795 according to the 2012 USDA Agricultural Census. USDA National Agricultural Statistic Service continues to under report the equine sector in their data collection, and failed to collect farm totals in 2017. This accounts for roughly one-fourth of all American livestock operations at the time, and likely underrepresents the total number of equine operations nationwide. Horses differ from other livestock species in that they live far longer, frequently up to 30 years. This means that the health, welfare and transport roles the USDA have responsibility for will be repeated multiple times per animal throughout a horse's life.

The USDA is primarily responsible for the surveillance, preparedness and response to diseases. That responsibility includes regulating the transportation of horses domestically and internationally. The ability to transport horses is essential to the success of this industry, as nearly every single use of a horse takes place away from its place of birth. The USDA has the responsibility for keeping travel open. Without their active engagement, the processes that serve to protect our industry could not function efficiently and often result in lost opportunities.

Upon your taking office, you announced the principles on which you would base your decisions and direction of the department. You stated your administration "will maximize the ability of America's agriculture and agribusiness sector to create jobs and to reap the earned reward of their labor. It should be the aim of the American government to remove every obstacle and give farmers, ranchers, and producers every opportunity to prosper." Furthermore, you added that you "will prioritize customer service every day for American taxpayers and consumers. They will expect, and have every right to demand, that their government conduct the people's business efficiently, effectively, and with the utmost integrity."

After considerable deliberation, we decided to write to you as the representative voice of the nation's horse industry, to express our concern over the lack of progress on the part of the USDA to take the actions needed to serve the best interests of our industry, interests which are consistent



with your stated principles. The following serve as examples of where the needs of the equine industry have not been met.

The industry has requested an extra 30 days additional to the existing 60-day travel waiver for Contagious Equine Metritis (CEM) testing for U.S. competition animals every year since 2012. This “90-Day waiver” poses no significant health risk, would vastly decrease the health and welfare risks posed by the CEM testing procedure, and would improve America’s competitive advantage in both sport and commerce. Industry leaders, equine health specialists, and USDA staff all agree that this rule change would improve the industry at no risk to national herd health. Every year the USDA has stated that the change is imminent, and yet each year passes without progress being made. Every year at stakeholder meetings, industry leaders are told that “APHIS will look for opportunities to expedite the rule-making process to update the current Contagious Equine Metritis requirements to allow horses to spend up to 90 days overseas before returning to the United States. APHIS is currently in the process of drafting a proposed rule to address this issue.” Eight years have elapsed and this request has still not been resolved. After years of repeated discussion, regretfully, we have come to the conclusion that this lack of action is reflective of general indifference to the state of the industry, and a preference to give other livestock issues greater priority to the detriment of the economic health of the equine industry.

Equine disease prevention, surveillance, and response is the focus of a shrinking group of USDA employees. Notwithstanding this lack of coverage, the USDA has ceased providing financial support of the Equine Disease Communication Center (EDCC), which fulfills a very important function of protecting horses and the horse industry from the threat of infectious diseases in North America. The communication system’s function is to receive and report real-time information about disease events similar to how the CDC alerts the human population about disease outbreaks in people. Arguably, a program well within the mission, funding capacity and scope of the USDA, it has fallen to the industry to fund and operate the EDCC. This has proven to be difficult to maintain without federal support. Each year at the USDA-APHIS stakeholders meeting, armed with U.S. Animal Health Association resolutions, industry stakeholders and state



animal health officials have requested partial funding to enable continued operation of the Center, each time to no avail.

Equine import agents and state animal health officials have raised numerous health and welfare concerns regarding the USDA's animal handling protocols at various points of entry into the USA. These have been ignored, posing a substantial threat to the industry from particular animal rights interests looking to exploit public's goodwill to stop the recreational use and transport of horses. Notable cases over the last three years of animals euthanized or barely escaping euthanization because of outdated testing systems mandated by the USDA alone have caused a great deal of concern and turmoil for our business leaders.

Inadvertent USDA roadblocks stand in the way of American athletes being able to compete abroad and represent our country at major events such as the Olympic and Paralympic Games, Pan Am Games, World Equestrian Games and competitions that are part of the selection process for athletes. This is contrary to the U.S. Olympic and Paralympic Committee and affiliated National Governing Body's responsibilities as well as the Ted Stevens Amateur Sports Act. These problems are creating significant mistrust of horse owners, athletes and coaches in the ability of USDA to protect the safety and welfare of these top equine athletes during USDA controlled import and export quarantine.

The federal government does not support research efforts to a proportional degree considering the economic and employment impacts that our industry contributes to the national economy. The equine sector continues to suffer from a lack of adequate funding to undertake important equine research. Unlike other livestock species, there is no national checkoff program to support marketing and research initiatives. Research on equine health related issues that lacks the necessary support cannot proceed despite its prioritization by horse owners according to recent surveys by the American Association of Equine Practitioners, American Veterinary Medicine Association and American Horse Council. At a time when livestock health and welfare concerns are front and center, limited ability to fund, implement, and promote equine research has a direct



negative impact on the health and welfare of horses and thus on the equine industry in general.

In 2019, USDA leadership chose to decline permission for some of their key and most active staff to attend critical equine health meetings hosted by the American Association of Equine Practitioners and the United States Animal Health Association. We have also been advised that USDA participation in the American Horse Council annual meeting is unlikely to be supported in 2020.

Most recently and perhaps most telling, the USDA disregarded the equine industry entirely when appointing representatives on the Consultation Board to assist with implementing the National Animal Disease Preparedness and Response Program. This occurred despite our request and submission of names of appropriate persons to fill such a role. All other species have representation on the Consultation Board.

The organizations represented by the American Horse Council appreciate the need for the USDA to take seriously the state of food, fiber and fuel production domestically and the inspections and approval of all food and animal products that are imported into the United States. The horse industry is proud to be a part of the American agricultural tradition and we expect to be given appropriate recognition for our role in today's modern agricultural system.

As such, we would like to increase stakeholder engagement with the USDA and create a pathway for more immediate action on problems affecting the health and economic well-being of the industry. While outreach by the USDA certainly exists, impacted stakeholders are regularly told that the decision-making process lies outside the realm of those officials participating in the conversation. Is it not appropriate for the equine industry to be represented on any advisory panels dealing with the totality of the livestock industry? More representation would promote industry engagement with the USDA in problem-solving partnerships to the benefit of horses and the equine industry, accomplishing the goals you enunciated upon taking office.

In light of the COVID-19 pandemic and the major economic downturn that is facing the



agricultural community, it is more crucial now than ever before for the equine community at large and the USDA to work collaboratively together. The equine industry is ready to welcome and provide guidance to the millions of Americans who will be looking for new and exciting recreational opportunities once current restrictions are lifted and they are free to leave their homes. We can only be as successful as the USDA will enable us to be; we sincerely hope you will take the opportunity to meet with us and help find that path forward in developing a more responsive and effective working relationship with the USDA.

Sincerely,

Julie M. Broadway, CAE®

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The following organizations urgently request your attention to address these issues.

American Association of Equine Practitioners

American Horse Council, Inc.

American Paint Horse Association

American Quarter Horse Association

Coalition of State Horse Councils

National Thoroughbred Racing Association

The Jockey Club, Inc.

United States Equestrian Federation

United States Trotting Association