

National Walking Horse Association

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October 19, 2023

The National Walking Horse Association has been in existence since 1998. We promote and increase public awareness of the true and inherent abilities of the Walking Horse and provide an equitable event affiliation program for Walking Horses, Spotted Saddle Horses, and Racking horses to be exhibited, judged, and showcased in full compliance with the Horse Protection Act. As a USDA certified HIO, we affiliate and sanction events such as horse shows, clinics, expositions, trail rides, obstacle challenges and more, and are proud to boast a 99% compliance rate with the USDA. Our DQPs are trained yearly as directed by the USDA and our DQP coordinator. In regard to the USDA APHIS rule 2022-0004, we have highlighted a number of crucial concerns that must be addressed before any action or implementation is taken.

NWHA affiliates up to 20 horse shows and events yearly with assigned DQP's from our HIO. If the HIO's are dissolved and the industry is forced to use HPI's, there is great concern over the cost and availability of HPIs to support the shows that affiliate with NWHA and other HIOs. The majority of these shows pay \$275-\$400 per day for their DQP and based on the estimates the cost may be significantly higher, eliminating the ability for shows and organizations to hold these events. Furthermore, with the HPI's, the Tier 1 are "mostly veterinarians". Today, we are facing a shortage of equine veterinarians to maintain the standard equine needs, and this rule is suggesting that there will be additional veterinarians that will be willing or have the resources to participate as an HPI. Simple facts show that of all U.S. veterinary school graduates, only 1.3% enter equine practice directly. Another 4.5% go through an internship program, so that only gets us over 5% of all veterinary school graduates tracking the equine path. The miserable statistic is that of those few (5%) choosing equine practice as a career more than half will leave the profession within the first five years. ¹ The American Association of Equine Practitioners (AAEP) took the lead on this matter a couple of years ago. By the year 2030 it is estimated the U.S. market will require 5,300 equine veterinarians to just stay even. Remember, we only have about 3,700-4,000 currently with a near-negative rate of replacement, while 30% of the current AAEP membership is 59 years of age or older. The simple truth is trying to hire a local Equine Veterinarian for any show or event, will not only be nearly impossible to secure but if available, will price the show or event out of feasibility.

There is also concern that these horse shows must advise of their need for an HPI at least 30 days prior to the horse show, yet it is outlined that there is a 15-day period of which to respond. If after 15 days, the event or show manager is informed and HPI is unavailable, said event will only have 15 days to secure another option for inspection, such as a local Veterinarian. This short time frame will either result in cancellation of the event or very costly fees at the last-minute request. Either option appears to be an unacceptable situation. Furthermore, if the show is cancelled due to weather/other issues, and an HPI has been issued, are there any repercussions for cancelling the show? No information is given to answer this question.

Further the requirement to have a farrier on call for shows that have less than 100 horses is cost prohibitive. Farriers, like Veterinarians, are hard to come by. They are in high demand and their prices have increased 46% over the average yearly inflation rate of 2.55%, sourced by: American Farriers Journal Survey. The annual wage for farriers is \$98,000. The daily monetary compensation to obtain a farrier or have a farrier on call, far outweighs what a one-day or two-day events is able to compensate. The expense for the majority of horse events and shows would be outrageous and make it impossible to balance with any sort of profit from the event or to make any charitable donations, should they choose to.

While we believe our horses should be exhibited, judged, and showcased in full compliance with the Horse Protection Act, there are a number of concerns as noted above that will directly and adversely affect the communities of Tennessee Walking Horse. The proposed regulations need to be thought out, researched, and edited to be made more affordable and with the ability to properly implement for the groups that choose to affiliate these shows. The National Walking Horse Association has always been transparent and compliant with the HPA and for those reasons, we believe the regulations need far more additional thought and discussion.

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Board of Directors