



American Association of Equine Practitioners  
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May 20, 2025

Dr. Louis DiVincenti  
Acting Animal Welfare Operations Director  
Regulatory Analysis and Development, PPD, APHIS, Station 2C-10.16  
4700 River Road, Unit 25  
Riverdale, MD 20737

**Re: Docket No. APHIS-2022-0004, Horse Protection Amendments; Further Delay of Effective Date, and Request for Comment**

Dear Dr. DiVincenti:

On behalf of the American Association of Equine Practitioners (AAEP), I want to thank the U.S. Department of Agriculture and the Animal and Plant Health Inspection Service (APHIS) for your commitment to ending the inhumane and illegal practice of intentional horse soring. We appreciate the strengthened Horse Protection Act (HPA) regulations announced last year and the agency's responsiveness to stakeholder feedback, including incorporating key changes that reflect input from the veterinary community.

While we are disappointed by the decision to delay the implementation of these long-overdue reforms, we understand the challenges and support APHIS's decision to delay implementation of the Horse Protection Amendments until they are able to issue a rule that can be truly impactful.

We remain steadfast in our support for an effective and enforceable rule and urge the USDA to move forward without weakening any of its key provisions that address the illegal practice of intentional horse soring. Most of the strengthened regulations announced in 2024 represented a critical and meaningful step toward protecting the welfare of Tennessee Walking Horses and related breeds. We commend the agency for taking this action and encourage you to maintain the parts of the rule that truly address intentional horse soring.

We are especially supportive of the following provisions announced in 2024:

- **Eliminating industry self-regulation**, including the removal of Designated Qualified Persons (DQPs), and requiring inspections only by APHIS inspectors and independent, non-APHIS-employed inspectors who are screened, trained, and authorized by the agency.
- **Prohibiting devices, methods, practices, and substances** that cause or are associated with intentional soring, including the use of action devices, non-therapeutic pads and wedges, artificial toe extensions, and any substances applied to the extremities above the hoof.
- **Replacing the outdated scar rule** with a more accurate and scientifically supported standard for identifying visible dermatological evidence of soring.

These reforms are grounded in sound veterinary science and reflect the experience and insight of those working every day to protect equine welfare. As veterinarians, we have seen firsthand the suffering inflicted by intentional soring, and we applaud the USDA for taking strong action to finally end this cruel and unnecessary practice.

As USDA considers any further amendments, we urge the Agency to maintain a clear and consistent focus on intentional soring—the deliberate infliction of pain to alter a horse’s gait for competitive advantage. It is essential that enforcement mechanisms and regulatory language distinguish intentional soring from soreness related to routine physical exercise or activity or legitimate veterinary care. Preserving this distinction is critical to ensure that enforcement and resources target actual violators.

Another point of concern is that, in its current format, the amended HPA rule affects an estimated 50,000+ equine events nationwide each year while USDA Animal Care research shows that less than 1% of those events are at risk of having sore horses compete. It is critical that reporting requirements remain tailored and proportional ensuring that disciplines in which soring offers no competitive advantage are not unnecessarily burdened and that valuable and limited resources by the Agency are used to help the horses being intentionally sored. This approach is essential to protecting horse welfare while also safeguarding the health and sustainability of the broader equine industry.

The AAEP remains committed to working with the USDA to ensure the successful implementation of these reforms and to support a smooth transition to

the new inspection and enforcement framework. We thank you again for your leadership on this critical issue and urge you to retain the integrity of the final rule as implementation moves forward. For questions regarding the AAEP's comments, please contact Dr. Ashley Morgan at 703-517-1196 or [amorgan@aaep.org](mailto:amorgan@aaep.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Tracy A. Turner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Tracy A. Turner, DMV, DACVS, DACVSMR  
2025 AAEP President