

May 26, 2022

Representative Janice D. Schakowsky
Chairwoman
Subcommittee on Consumer Protection and
Commerce
Committee on Energy and Commerce
U.S. House of Representatives
2367 Rayburn House Office Building
Washington, DC 20515

Representative Gus M. Bilirakis
Ranking Member
Subcommittee on Consumer Protection and
Commerce
Committee on Energy and Commerce
U.S. House of Representatives
2354 Rayburn House Office Building
Washington, DC 20515

Dear Chairwoman Schakowsky and Ranking Member Bilirakis,

The American Veterinary Medical Association (AVMA), which represents 95,500 veterinarians nationwide, appreciates the committee holding a hearing to bring attention to the welfare of America's unwanted horse population. The objective of the AVMA is to advance the science and art of veterinary medicine, including its relationship to public health, biological science, and agriculture. The AVMA provides its members a forum for discussion of issues of importance to the veterinary profession and for the development of official positions in related areas. The AVMA is therefore the recognized voice for the profession in presenting its views to government, academia, the agriculture industry, animal owners, the media, and other stakeholders.

While the AVMA appreciates the intent of H.R. 3355, the SAFE Act, is to protect horses, the bill is not consistent with AVMA policy on Transportation and Processing of Equines, which endorses the American Association of Equine Practitioners' (AAEP) policy stating, "The AAEP recognizes that the processing of unwanted horses is currently a necessary aspect of the equine industry, and provides a humane alternative to allowing the horse to continue a life of discomfort and pain, and possibly inadequate care or abandonment."

The AVMA's primary concern is the long-term wellbeing of the horses affected by the proposed legislation. We oppose H.R. 3355 because it does not adequately address the following issues:

- **Animal Welfare:** H.R. 3355 does not address the welfare of horses that will not be slaughtered. Many of these unwanted horses will be donated to horse rescue and retirement facilities, which are not regulated by any governmental body. While many of these facilities are well run, some are not and regulations must be put in place to establish standards of care to ensure the humane treatment of these unwanted horses across all of these facilities.
- **Costs Related to the Care of the Horses:** H.R. 3355 does not address the financial support required for unwanted horses that cannot be slaughtered. Insufficient funding has a huge

potential to create opportunities for inadequate care, which will negatively impact the welfare of the horse.

- **Environmental Concerns Related to Horse Carcass Disposal:** The primary options to dispose of horse carcasses, other than processing at slaughter facilities, include burial, rendering, cremation, placement in a landfill, and composting. However, disposal regulations and methods available for disposal vary by state and, sometimes, county or municipality. Not all options are available to all horse owners, and the inevitable disposal of additional horse carcasses raises environmental concerns, including potential soil contamination and poisoning of wildlife by euthanasia drugs in buried carcasses. The cost of disposal for a horse carcass also varies widely by state, from \$10 to \$1500, depending on the method of disposal.

Please feel free to contact Dr. Cia Johnson (cjohnson@avma.org) or Whitney Tyler (wtyler@avma.org) with any questions or comments as the AVMA is committed to working with you to address the unwanted horse problem in this country.

Respectfully,



Janet D. Donlin, DVM, CAE
Executive Vice President and Chief Executive Officer



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Dear Chairwoman Schakowsky and Ranking Member Bilirakis, and Committee and Subcommittee members,

On behalf of our more than 9,300 members in the field of equine veterinary medicine, I am writing to express our **strong opposition** to the passage of **H.R. 3355 the Save America's Forgotten Equines Act of 2021**, also known as the "SAFE Act of 2021"

Opposition in Congress and in horse industry, veterinary, and other groups

The SAFE Act DOES NOT have broad bipartisan support. In addition, the two largest veterinary associations in the U.S., the American Association of Equine Practitioners and American Veterinary Medical Association, and the largest equine association in the world, the American Quarter Horse Association, along with countless other horse producers, and equine associations, do not support this legislation. Plus, there is no interest by the Senate to support such legislation and there is no similar legislation introduced in the Senate, nor has there been in previous Congresses of late.

How SAFE could harm horses

The Save America's Forgotten Equine (SAFE) Act, H.R.3355, would make it illegal to export horses for processing for human consumption. This legislation, if passed would have immediate and significant unintended consequences for thousands of domestic horses at risk for inadequate care. AAEP has always opposed this legislation because the association does not believe that any horse should suffer from abandonment, neglect, nor starvation.

In 2011, the Government Accountability Office (GAO) submitted a report to Congress which concluded that horse welfare in the U.S. had generally declined since the shuttering of horse processing facilities in the U.S. in 2007. The report clearly linked the 2007 ban with the decline in welfare conditions, discussing the notable increase in horse abandonments and increased incidents of investigation for abuse and neglect. The domestic ban removed a necessary tool for horse owners who may not have other humane options for horses that would otherwise face abandonment or starvation. Should the SAFE Act pass, it would further remove options for humane euthanasia for horse owners with unwanted horses.

Humane treatment of all horses is paramount. AAEP's position is consistent with those of the American Veterinary Medical Association (AVMA):

"The processing of unwanted horses is currently a necessary aspect of the equine industry and provides a humane alternative to otherwise subjecting a horse to a continued life of discomfort, pain and possibly inadequate care or abandonment."

AAEP believes horses, including those destined for a processing facility, should be euthanized humanely with dignity in accordance with AVMA's Euthanasia Guidelines, endorsed by the AAEP as well. Furthermore, transportation to the processing facilities should be in accordance with the robust federal statute, regulation and guidelines passed in the Humane Transportation of Horses to Slaughter Act approved by the United States Department of Agriculture in 2002.

In February 2020, AAEP Past President Dr. Doug Corey from Oregon testified at an Energy and Commerce hearing on this issue. View Dr. Corey's testimony at <https://docs.house.gov/meetings/IF/IF14/20200129/110423/HHRG-116-IF14-Wstate-CoreyD-20200129.pdf>.

The AAEP has long opposed this legislation. The industry continues to work promote owner responsibility, aftercare, adoption and more. We encourage members of the committee to oppose this legislation as well and allow the industry to continue to care for its horses.

Sincerely,



Emma Read, DVM, MVSc, DACVS,
President 2022

American Association of Equine Practitioners