



# 2024 Horse Protection Act Amendments

## How to Submit Comments on Delayed Implementation

Implementation of the 2024 Horse Protection Act Amendments is delayed until February 1st, 2026. This is an extension of the original delay that was set to end on April 2, 2025.

**The USDA is currently soliciting comments from the public until May 20th, 2025** regarding “this extension provides a sufficient period of time, or whether the delay should be extended for a second season...[and] solicit any supplemental information regarding Horse Protection Act authorities, standards, recordkeeping, or other matters that may help inform a decision regarding an appropriate length of postponement.”

The American Horse Council (AHC) has put together recommendations for submitting your own comments. **As always, we're here to help and are happy to answer any questions you have.**

### So what does this mean?

In simple terms, the USDA is asking the public if delaying the updated Horse Protection Act regulations until February 1, 2026 is enough time to resolve any outstanding issues.

**If you have concerns or suggestions for USDA regarding the delay of the updated regulations you need to submit comments no later than May 20th, 2025.**

USDA is only accepting comments on the delay and not accepting comments on the entire HPA regulation.

### What should your organization do if you would like to submit comments?

It's important when submitting comments **quality** of comments is more important than the **quantity** of comments. The AHC recommends that you write comments that include personal experiences related to yourself or your organization instead of copying and pasting from form letters circulated by other organizations. Multiple copies of identical form letters may only be counted as a single comment/opinion and do not allow for nuanced discussion of the issues.

*Your comments become part of the public record and are available for anyone to read.*

**Tone of the letter is key.** While you or your organization may not agree with every aspect or decision made by USDA-APHIS regarding the rule, it's important to be respectful and professional in your feedback. Abusive language or messaging directed at agency staff will not benefit anyone.

#### To Submit comments and View the Announcement:

<https://bit.ly/HPACommentOpportunity>

You can view the full 2024 Horse Protection Act Amendments here:

<https://bit.ly/HPAAmendments>

#### The format of a comment is a letter addressed to the agency and should include the following:

- If you support the current delay time period or request an extension
- Background of your organization and how amendments impact you and your horses/members
- What actions your organization currently takes to protect the health and welfare of horses at your horse shows
- If there are other aspects related to the amended rules that you would like to see updated or changed *before implementation*.
  - This includes issues related to policies/protocols, record keeping and reporting requirements, and other issues specifically related to the language in the rule
- Additional requests of the agency to better facilitate rule implementation
- Anecdotes or other personal experiences to demonstrate why the feedback your providing is relative to the issue

## Suggestions for Topics to Include in Comments

The AHC conducted numerous interviews and solicited feedback from dozens of disciplines and breed associations across the industry and has the following recommendations for specific topics to include in your comments:



### Regarding the Delay of Implementation and Stakeholder Feedback

- Reopening the comment period on the 2024 Horse Protection Amendments (not just the implementation delay)
  - AHC is requesting this to allow the public to comment on the full regulation instead of the specific areas solicited in this current call for comments. This would allow stakeholders such as yourself to provide feedback on all aspects of the amended rule.
- Further delay implementation of the 2024 Horse Protection Amendments until February 1, 2027 to allow discussion groups and listening sessions with industry stakeholders
  - The AHC understands that USDA-APHIS needs significant time to update the rule as a result of lawsuits determining parts of the rule to be unconstitutional. Asking for a further extension to the delay and requesting USDA-APHIS schedule stakeholder listening sessions and discussion groups to gather further feedback is an important step to making sure industry needs are considered when rewriting the vacated sections of the amendments.
- We recommend providing specific dates you would like to see listening sessions and discussion groups, AHC requested these activities happen at least once before September 1, 2025 and at least once before January 1, 2026.



### Regarding the Definition of "Soring"

Refocus the rule to prevent the act of *intentional* soring via modernizing the definition of "Soring" in Section 11.1

AHC is requesting that the term "*intentional*" be added to the definition of soring, specifically worded in red as:

1. An irritating or blistering agent has been applied, internally or externally, by a person to any limb of a horse;
2. Any burn, cut, or laceration has been intentionally inflicted by a person on any limb of a horse;
3. Any tack, nail, screw, or chemical agent has been injected by a person into or used on any limb of a horse; or
4. Any other performance enhancing substance or irritant or device has been used by a person on any limb of a horse or a person has engaged in a practice involving a horse, with the intention that such application, infliction, injection, use, or practice, would knowingly cause the horse to suffer physical pain or distress, inflammation, or lameness when walking, trotting, or otherwise moving, except that such term does not include such an application, infliction, injection, use, or practice in connection with the therapeutic treatment of a horse by or under the supervision of a person licensed to practice veterinary medicine in the State in which such treatment was given.

With a new segment (5) to be added:

5. Sored/Soring does not include unintentional lameness as a result of routine physical activity or exercise.



## Regarding Reporting, Inspections, and HPI Licensing

- Any requirement for events notification shall be restricted to events which an altered gait due to hypersensitivity would be advantageous.
  - *AHC is requesting this to ease the burden on horse show organizers that are not running classes where horses are at risk of being sored.*
- Inspection shall be restricted to detection of hypersensitivity of a limb causing an altered gait and use of devices which result in a hypersensitivity altered gait.
  - *AHC is requesting this to ensure the enforcement of HPA is in line with the intent of the original law and focuses on the act of soring specifically, not unrelated lameness.*
- HPI licensing should require completion of a science-based course reviewed by subject matter experts, along with mandatory in-person, onsite training, prior to approval by APHIS.
  - *AHC is requesting this as the industry feels hands on learning to detect soring is the most effective teaching tool to protect the welfare of horses and prevent soring of the limbs.*

## Regarding USDA-APHIS Policy and Procedure Development

AHC is recommending the following be realized before implementing the 2024 Horse Protection Amendments to best ensure a smooth implementation of the rule:

- All HPA protocols and procedures shall be based on current research, scientific peer reviewed publication and subject matter experts.
- All protocols and guidance shall be made publicly available on the USDA-APHIS HPA website.
- USDA-APHIS-Animal Care have trained USDA HPA staff with equine knowledge and expertise.
- USDA communications must be adequate to answer any and all industry questions prior to implementation. Failure to provide adequate answers based on industry feedback, shall result in USDA official notification of further delayed implementation of any rule.



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