

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,

A handwritten signature in black ink that reads "Janet D. Donlin DVM". The signature is fluid and cursive, with the last name "Donlin" being more prominent.

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