



September 3, 2014

Docket No. APHIS-2014-0044
Regulatory Analysis and Development
PPD, APHIS, Station 3A-03.8
4700 River Road
Unit 118
Riverdale, MD 20737-1238

**Re: Docket No. APHIS-2014-0044
Notice of Request for Reinstatement of an Information
Collection; National Animal Health Monitoring System;
Equine 2015 Study**

Dear Sir or Madam:

The American Horse Council (AHC) appreciates the opportunity to submit comments to the U.S. Department of Agriculture, Animal and Plant Health Inspection Service, (USDA or Department) in support of its intention to request a three-year reinstatement of an information collection to support the National Animal Health Monitoring System's Equine 2015 Study (Equine Study) to support the equine industry in the United States.

American Horse Council

The AHC is a Washington, DC-based association that represents over 120 equine organizations before Congress and the federal regulatory agencies. AHC member organizations include breed registries, national and state equine associations, state horse councils, recreational associations, and organizations representing race tracks, horsemen, horse shows, veterinarians, farriers, rodeos, and other equine-related stakeholders. The AHC also includes individual horse owners and breeders, veterinarians, farriers, trainers, professional, amateur, and recreational riders, and commercial suppliers. Individually, and through our organizational members, the AHC represents several hundred thousand horse owners and others involved in all sectors of the horse industry.

Economic Size of the Horse Industry

According to the *Economic Impact of the Horse Industry in the United States*, a study done for the American Horse Council by Deloitte Consulting, LLC, the horse industry involves 9.2 million horses. 4.6 million Americans are directly involved in the industry, including nearly 2 million horse owners. The horse industry has an annual \$102 billion impact on the U.S. economy and supports 1.4 million jobs. Forty-five states have more than 20,000 horses; thirty-five states have more than 100,000.

The horse industry is a large industry of national scope that is built on the agri-business of breeding, raising, training, and using horses. It is an important part of the U.S. agriculture industry and an important part of USDA's agricultural responsibilities.

Information Collection - NAHMS Equine 2015 Study

USDA proposes to request a reinstatement of its information collection to support the NAHMS' Equine Study. The AHC fully supports this Equine Study and recognizes how important it is to USDA to accomplish its goal of protecting the health of U.S. horses and the economic viability of the U.S. horse industry. The industry has already participated in formulating the Equine Study and now supports the Department's request to collect the information over three years to complete the Equine Study. The study will collect data on equine diseases, risk factors, trends in equine care and management, infectious diseases, and costs of equine care, among other things. The data will be used to educate the horse industry, improve equine health management practices, identify research needs, and other beneficial goals.

The AHC supports this information gathering for the Equine Study as necessary and important to the Department's functions and responsibilities regarding equine. We support the Department's intent to minimize any burden in the collection process by gathering the information through up-to-date collection processes.

The equine industry is a diverse part of the U.S. economy. USDA plays an important role in safeguarding our industry and the AHC believes the Equine Study will provide additional tools to the Department in that effort.

We look forward to the results of the Equine Study as it will assist the industry, veterinarians and stakeholders by identifying current infection-control practices, including biosecurity and vaccination, equine identification and traceability, and information regarding equine care and welfare management-issues. In addition, the economics of horse ownership continue to be of the utmost importance to the industry and the information coming from this study will assist the industry in its analysis of ownership across the U.S.

Conclusion

The AHC appreciates the opportunity to submit these comments in support of the continued collection of information for the NAHMS 2015 Equine Study. If you have any further questions or would like to meet to discuss these comments, please contact us.

Sincerely,

A handwritten signature in cursive script, reading "James J. Hickey, Jr.", followed by a small flourish.

James J. Hickey, Jr
President