

## **Industry Recommendations regarding the Introduction of New Technologies for Enforcement of the Horse Protection Act**

The Tennessee Walking Horse (TWH) industry is committed to promoting and protecting the welfare of the Tennessee Walking Horse, and preserving the TWH industry for future generations. Since the enactment of the Horse Protection Act (HPA) in the early 1970's, there has been significant improvement in the handling and presentation of the Tennessee Walking Horse. In order to continue this progress, the TWH industry would like to work collaboratively with USDA to further increase compliance with the HPA, and supports the appropriate use of technology to do so. The Walking Horse Trainers Association has previously expressed to USDA their willingness to collaborate on evaluating new technology, including providing horses that can be used in the evaluation of such technology.

To ensure that any new technology that is introduced is effective and functions as it should, the industry makes the following recommendations;

- 1) Before new technology is introduced, it needs to be validated for use in a horse show environment, and for the purpose intended. This is true whether it is completely new technology or technology that is being adapted from another use, such as human medicine or forensics. This validation data, and any conclusions or plans for implementation should be offered for public comment. This will ensure that the proposed technology is well reviewed, and will ensure transparency and trust in the new technology.

Information that should be provided should include at least:

- Any time the new technology is being evaluated on privately owned horses, those test results should be provided directly to the owners and/or trainers of those horses. This will help in the evaluation process as owners or trainers can identify any discrepancies between test results and known status of the horse.
  - Data showing how the technology was validated for use in the horse show environment.
    - How many positive tests were correlated back to known substance use on horses (positive reference)?
    - How many negative tests were correlated back to horses known to be free of all substances (negative reference)?
  - What is the sensitivity and specificity of the test in a horse show environment? (i.e. expected level of false positive and false negative results?)
  - What are the cut-off thresholds for positive and negative results?
  - How many labs were involved in the validation study and how closely did results correlate from those labs?
  - What will the protocol for sampling be and how will samples be collected and handled?
- 2) The proposed technology, associated validation data, and protocols for use should also be reviewed by an independent, scientifically based third-party to help ensure that the science is sound and proposed application of the technology is appropriate. An example of such a

committee would be the United States Animal Health Association (USAHA) Committee on Animal Welfare. The membership of the USAHA is crosscutting and includes state and federal regulatory animal health officials as well as industry. The stated mission of the USAHA Committee on Animal Welfare is: “explores animal welfare concerns and seeks to present data in an honest, unbiased, science-based manner for USAHA membership to evaluate. In this capacity, the committee serves as a forum for promoting dialogue between the various animal welfare groups and industry and for promoting the development of broad-based animal welfare solutions”. This type of scientifically based external review will help protect the integrity of the program, and is general practice for other USDA animal health related programs.

- 3) To help ensure that the new technology functions as it should without causing false positive results, guidelines on its use must be provided to the industry. For example;
  - a. If gas chromatography/mass spectrometry technology (GC/MS) is used, how long before a show does a handler need to be sure to not use any non-injurious salves in order to avoid having the GC/MS register a positive response?
  - b. If trainers/handlers have hand cream or over-the-counter antibiotic cream on their own hands, can enough get transferred by handling horses to cause a positive test?
- 4) The industry needs to be notified well in advance of the introduction of new technologies or procedures, so that productive discussion can occur and a level of trust in the system can be developed. Also, it is critical that policy changes be introduced in such a way that the industry has adequate time to respond. Ideally, any proposed changes should initially be introduced in the fall, well prior to the start of the show season, so that the industry has time to become educated on any new technologies or procedures.