



The Alberta Horse Welfare Report

A report on horses as food producing animals aimed at addressing horse welfare and improving communication with the livestock industry and the public.

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Alberta Equine Welfare Group

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Terms Used in this Report:

Euthanasia: This report uses the term euthanasia to refer to all humane forms of death, no matter the end result of the dead animal carcass. The following is taken from the American Veterinary Medical Association’s Euthanasia guidelines:

“The term euthanasia is derived from the Greek terms eu meaning good and thanatos meaning death. A “good death” would be one that occurs with minimal pain and distress. In the context of these guidelines, euthanasia is the act of inducing humane death in an animal.”

Slaughter: This report will, in most cases, only use this term as it relates to laws and regulations or is within a quote. In North America, this word is used to describe ending the life of an animal under strict federal regulations governing that it is humane, and it only used when the carcass is processed at a licensed meat plant for food purposes. In the EU, slaughter is used by authorities to describe humane animal death, no matter the end result of the carcass.

Processed: This report uses this term to describe the handling and killing of an animal and processing of the carcass for food at a meat plant.

Meat Plant/Abattoir: In this report, the two terms are used interchangeably. All references to Canadian meat plants or abattoirs refer only to federally inspected facilities.

Disclaimer

The primary purpose of this Report is to examine horses as food producing animals and is aimed at addressing horse welfare and improving communication with the livestock industry and the public. It is important to note that the authors have made every effort to ensure accuracy and completeness. All information is provided entirely ‘as is’ and the authors make no representations, warranties or conditions, either express or implied, in connection with the use of or reliance upon this information. The information is provided to the recipient entirely at the risk of the recipient and, because the recipient assumes full responsibility, the authors shall not be liable for any claims, damages or losses of any kind based on any theory of liability arising out of the use of or reliance upon this information (including omissions, inaccuracies, typographical errors and infringement of third party rights).

EXECUTIVE SUMMARY

A report on horses as food producing animals has been completed by the **Alberta Equine Welfare Group**. It presents facts on the humane treatment of horses processed in Alberta and Canada for food, identifies areas that need improvement and spells out the impact of the closure of horse meat plants in the US. The aim is to provide a base of information to encourage constructive, open communication on a sensitive issue and address ways to continually improve horse welfare.

The **Alberta Equine Welfare Group** is comprised of representatives from Alberta Equestrian Federation, the Horse Industry Association of Alberta, Alberta Veterinary Medical Association, Alberta SPCA, the RCMP, University of Alberta, meat processors, feedlot owners, horse buyers and Alberta Agriculture and Food. Most are members of Alberta Farm Animal Care (AFAC), the organization providing project management services for the group.

The report includes historical data on horse meat consumption. Over one billion people or 16% of the world population eat horse meat. Consumption of horse meat has increased 27% since 1990. In terms of nutritional value, horse meat has 20% more protein and double the iron of beef. Among others, Asians, Europeans and Canadians eat horse meat.

Humane treatment of horses throughout their lifetime and at death is a priority. The report highlights Canadian legislation that is in place and is enforced to ensure the humane treatment of horses, at the farm, at auctions, while in transport and at all federally inspected meat plants. In addition, the report details the USDA regulation that states US horses transported to Canadian meat plants **must** go on **single deck trailers** and be inspected by USDA and CFIA veterinarians. The reports notes recent gaps in the adherence to this rule and notes Alberta horse industry requests for action to fix this.

Unlike many US states, livestock are **not** exempt from Canada's animal protection laws. Studies done by AFAC and the Alberta SPCA and by Dr. T. Grandin point to original **owner induced neglect** as the core equine welfare concern. The report identifies recommendations to improve this.

The report includes a description of the horse industry in Alberta with respect to horses as food producing animal. Many horses are **purpose-raised for meat production**. The types of horses received at the Alberta horse meat plant and the humane handling practices in place are outlined. Before the US horse plants closed in 2007, 50,000 horses were processed in Canada for human consumption. **By the end of 2007, this number had doubled.** A new plant has opened in Saskatchewan with a capacity equal to the Alberta plant. The number of horses imported into Canada has increased by 40%.

The report describes euthanasia options available to horse owners in Alberta. The associated costs and benefits are discussed.

People tend to view their horse as livestock, as working animals or as companion animals. These **different viewpoints are acknowledged in this report.** What is important is that all horses be treated humanely throughout their lifetime. This must include options for humanely ending the horse's life. This is ultimately the choice of the horse's owner.

It is well known that horse meat plants in the US have been closed as a result of pressure from organizations opposed to horses as a meat producing animal. This report tells of the actions and the **resulting consequences of growing horse neglect, abandonment and starvation.**

The **Alberta Equine Welfare Group** believes that processing horses for food is a humane end to a horse's life. This group is committed, and encourages other horse industry groups, to seek the continuous improvement of equine welfare and develop open communication to increase the awareness of the humane approaches to husbandry, handling, transporting and processing of horses in Canada.

CHAPTER 1

- Introduction

Horses are a food producing animal. In the United States, the pressure to ban killing horses for food because it considered “inhumane and un-American” has gained strong momentum. The resulting horse welfare and economic impact is already significant in the US. This same pressure to implement such restrictive legislation may take a foothold in Canada, with the same resulting consequences.

In December 2006, a diverse group representing the Alberta horse industry, AFAC, enforcement agencies and veterinarians met to discuss a strategy to address the issue in Alberta and manage public pressure related to horse welfare and horses for food in Canada. The **Alberta Equine Welfare Group (AEWG)** was formed to oversee and implement a **plan** to address horse welfare and to improve communication within the livestock industry and with the public.

This group supports the Alberta Equestrian Federation and Equine Canada’s position statement in regards to horses bound for processing that states horses must be:

- Treated humanely and with dignity;
- Transported to the production facility according to current national regulations;
- Euthanized in accordance with the guidelines adopted and published by the Canadian Veterinary Medical Association as of February 2006.
- Processing horses provides a humane alternative to allowing horses to continue a life of discomfort and pain, inadequate care or abandonment.

The **overall objective of the plan** is to improve horse welfare and provide tools to manage any public pressure related to horse welfare and horses processed for food. The first step was to prepare a **situational analysis report**.

The focus of the report is Alberta, but where relevant, other jurisdictions are examined. The report covers:

- The horse industry in Alberta, as it relates to horses as food producing animals
- The players in the humane treatment of horses
- The laws and guidelines for humane care and euthanasia of horses and food safety
- Historical perspective of horse meat consumption
- Current dispatch and disposal options for horses
- The anti-horse slaughter movement in the United States
- The consequences of a ban on horse slaughter
- A description of issues and risk areas that need to be addressed
- Recommendations for action.

The **Alberta Equine Welfare Group** is comprised of representatives from Alberta Equestrian Federation, the Horse Industry Association of Alberta, Alberta Veterinary Medical Association, Alberta SPCA, the RCMP, University of Alberta, meat processors, feedlot owners, horse buyers and Alberta Agriculture and Food. Most are members of Alberta Farm Animal Care (AFAC), the organization providing project management services for the group.

CHAPTER 2 - Historical Perspective of Horse Meat Consumption

Horse Meat Consumption & Trade Worldwide

Over one billion people, or 16% of the world population, eat horse meat. Horse meat is commonly eaten in many European and Asian countries. According to the Food and Agriculture Organization of the United Nations' (FAO) FAOSTAT website (<http://faostat.fao.org>), 959,910 tonnes of equine meat was consumed worldwide in 2005, with total production being 1,040,450 tonnes.¹ **This is an increase of 27.6% in consumption since 1990 (694,930 tonnes) as well as an increase of 22.7% in production (803,910 tonnes).**

In terms of **nutritional value**, a 4 oz piece of horse meat has 20% more protein than high quality beef cuts, 25% less fat, nearly 20% less sodium, double the iron and 1 mg less cholesterol than beef sirloin. When compared to ground beef, horse meat has 55% more protein, 25% less fat, 30% less cholesterol and 27% less sodium.²

According to Dr. Tim Cordes, USDA senior staff veterinarian and National Coordinator Equine Health and Slaughter Horse Transport for USDA, the price of horse meat in Europe is at an all time high. Demand is high in part because of BSE, Avian Flu, and other disease outbreaks in other meat sources. He also notes that the marketplace will find horses for food from other countries, like Mexico or South America, if it is unable to source from the US or Canada.

China consumes more equine meat (421,620 tonnes) than any other country. Table One illustrates the ten-year trend amongst countries with the greatest consumption of equine meat. FAO statistics list Canada and the United States as having zero consumption of equine meat. However, a domestic market does exist for horse meat in Canada, amounting to between 1,000 to 1,200 tonnes per year, according to a recent CFIA report.

Table One: Equine meat consumption quantity (1000 tonnes)

	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005
China	385.27	375.42	369.87	377.31	401.45	413.31	416.79	419.97	420.47	421.62
Mexico	76.77	77.41	78.28	79.04	79.69	80.39	81.23	82.18	83.18	84.17
Russian Federation	61.39	55.07	47.58	45.57	56.31	70.52	81.06	77.07	74.15	76.04
Italy	71.43	70.35	69.74	70.03	70.73	70.87	69.76	67.80	65.51	63.29
Kazakhstan	66.15	63.26	65.59	62.74	55.17	54.09	51.07	54.00	55.88	54.46
Argentina	21.19	22.29	23.61	24.84	25.40	25.57	25.60	25.72	25.99	26.37
Mongolia	30.99	39.51	45.83	48.32	46.09	40.06	33.57	28.62	26.33	25.37
France	32.55	31.39	30.70	30.52	30.82	30.68	29.77	28.26	26.44	24.54
Australia	15.52	15.74	15.94	16.28	16.82	17.41	17.94	18.37	18.75	19.12
Kyrgyzstan	13.36	15.93	18.50	20.74	22.61	24.03	24.03	22.81	20.77	18.83
Ukraine	7.87	9.24	9.47	9.05	8.91	10.38	12.70	14.72	15.83	16.40
Japan	23.72	21.70	20.24	19.53	17.62	15.23	13.61	13.97	14.96	15.84
Belgium	0.00	0.00	0.00	0.00	13.03	12.07	11.79	11.23	10.35	9.47

¹ Food and Agriculture Organization of the United Nations, <http://faostat.fao.org> (visited on Oct. 26, 2007)

² Animal Welfare Council, *The Unintended Consequences on a ban on the humane slaughter (processing) of horses in the United States*, May 2006, available at www.animalwelfarecouncil.org.

In 2005 the top ten *importing* countries for equine meat (highest to lowest per 1000 tonnes) were: France (32.01), Belgium (29.99), Russian Federation (29.48), Italy (23.78), Netherlands (17.40), United States (11.51), Japan (9.51), Mexico (4.80), Canada (4.64), and Switzerland (4.25).

In 2005 the top ten *exporting* countries for equine meat (highest to lowest per 1000 tonnes) were: Argentina (35.08), United States (30.38), Belgium (25.07), Poland (19.85), Brazil (19.14), Canada (18.04), France (15.22), Netherlands (11.25), Mongolia (5.34) and Uruguay (5.29).

Cultural Factors

English-speaking countries such as the United Kingdom and the US do not tend to consume horse meat. Cultural traditions do not include horses as a food source. Yet these countries are often net exporters to non-Anglo countries that do consume horse meat as a protein source.

In the eighth century, Popes Gregory III and Zachary instructed Saint Boniface, missionary to the Germans, to forbid the eating of horse flesh to those he converted, due to its association with Germanic pagan ceremonies. The people of Iceland allegedly expressed reluctance to embrace Christianity for some time, largely over the issue of giving up horse meat.³

Horse meat is forbidden by Jewish dietary laws because horses do not have cloven hooves.

In many Islamic countries horsemeat is forbidden or considered *makruh*, meaning it is not forbidden, but it is better not to eat because side-effects it might cause. However, horse meat is eaten in some Muslim Central Asian countries with a tradition of nomadic pastoralism, e.g. Kazakhstan, Kyrgyzstan and Turkmenistan. In other majority-Muslim countries there have been many instances, especially during wars and famine, when horse meat was eaten.

In countries where horse meat is consumed, each country has preferences regarding the leanness and age of the meat. Italians prefer less lean, Belgians prefer lean, and the French and Quebecois prefer meat with more 'stretch' or meat from older animals.⁴

In Japanese cuisine, horse meat is entrenched in the culture. Raw horse meat is called *sakura* or *sakuraniku*, (*sakura* means cherry blossom and *niku* means meat) because of its pink colour. It can be served raw as very chewy sashimi in thin slices dipped in soy sauce, often with ginger and onions added. In this case, it is called *basashi*. Fat, typically from the neck, is also found as *basashi*, though it is white, not pink. Horse meat is also sometimes found on menus for *yakiniku* (a type of barbecue), where it is called *baniku* or *bagushi* (skewered horse); thin slices of raw horse meat are sometimes served wrapped in a shiso leaf.⁴ The Japanese market demands that horse meat be fresh and less than three days old from processing to plate.

³ Wikipedia, http://en.wikipedia.org/wiki/Horse_meat, (visited on August 25th, 2007).

⁴ Le Viande de cheval, <http://www.radio-canada.ca/actualite/lepicerie/docArchives/2004/02/19/reportage.shtml>, (Visited on August 20th, 2007).

Horse Consumption in the United States and Canada

Americans have periodically eaten horse as a red meat option. During World War II and post war years, when other red meat was scarce or out of the price range of average Americans, horse meat was eaten. In 1951, *Time* magazine reported on the growing consumption of horse meat. The article even provided tips for cooking equine pot roast and fillets.⁵

Americans also turned to horse meat in the early 1970s when rising inflation left other red meats out of reach for average Americans. *Time* magazine again reported on a shop in Westbrook, Connecticut selling horse meat exclusively, with sales of 6,000 pounds per day. The shop even published a 28-page cookbook. Although not in print anymore, the book can be found catalogued on the internet.⁶

In most of Canada, horse meat is only available in specialty meat shops. In Quebec horse meat is available in restaurants or ‘boucherie chevaline,’ as well as regular grocery stores.⁷

CHAPTER 3

- Laws, Guidelines and Enforcement for the Humane Treatment of Horses and Food Safety

The Laws

Canadian federal and provincial legislation is in place to ensure the humane treatment of horses, including for food use. In addition, the USDA Code of Federation Regulations, Part 88: *Commercial Transportation of Equines for Slaughter* is followed as per a shared enforcement agreement between Canadian Food Inspection Agency (CFIA) and USDA.

Provincial Legislation in Alberta

Alberta’s revised (2006) ***Animal Protection Act (APA)*** and regulations now include duties of care and the *Transportation of Animals Regulations*. The APA states:

No person shall cause or permit an animal of which the person is the owner or the person in charge to be or to continue to be in distress. For the purposes of this Act, an animal is in distress if it is

- (a) deprived of adequate shelter, ventilation, space, food, water or veterinary care or reasonable protection from injurious heat or cold,***
- (b) injured, sick, in pain or suffering, or***
- (c) abused or subjected to undue hardship, privation or neglect.***

The APA animal care duties state:

A person who owns or is in charge of an animal

⁵ The New York Times, ‘*We eat horses, don’t we?*’, March 5, 2007.

⁶ Ibid.

⁷ Le Viande de cheval, <http://www.radio-canada.ca/actualite/lepicerie/docArchives/2004/02/19/reportage.shtml>, (Visited on August 20th, 2007).

- (a) *must ensure that the animal has adequate food and water,*
- (b) *must provide the animal with adequate care when the animal is wounded or ill,*
- (c) *must provide the animal with reasonable protection from injurious heat or cold,*
- (d) *must provide the animal with adequate shelter, ventilation and space.*

Other key features of the APA include:

- The definition of livestock includes horses and **unlike many US state animal protection laws, livestock are not exempt;**
- The regulations can reference external sources for standards of care (e.g., persons using animals in research must adhere to the Canadian Council on Animal Care guidelines). This has the potential to give industry guidelines quasi-judicial status;
- Humane transportation sections are consistent with federal legislation;
- The ability to issue specified penalties as an enforcement tool;
- Fines can be as high as \$20,000 and can include prohibition of ownership of animals.

Federal Legislation in Canada

Cruelty to Animals

The *Criminal Code, Section 446 – Cruelty to Animals* prohibits cruelty to animals that is willful or without lawful excuse. It is enforceable by Police Officers and some provincial SPCA officials. Criminal Code use for animal cruelty offenses is limited, particularly in Alberta where it is easier to proceed under the provincial APA legislation and fines are more of a deterrent.⁸

Health of Animals Act, Transportation of Animals Regulations

These regulations provide:

- Measures to protect animals from undue suffering during loading and transport.
- Rules for the importation and exportation of animals.

The regulations state no one can load or cause to be loaded, transport or unload animals in a way that would cause injury or undue suffering. **The regulations:**

- **prohibit** the transportation of an animal “*that by reason of infirmity, illness, injury, fatigue or any other cause cannot be transported without undue suffering during the expected journey.*”⁹
- **prohibit** overcrowding and the transportation of animals that are unfit to travel;
- **prohibit** the transportation of non-ambulatory animals, for purposes other than veterinary treatment or diagnosis;
- **require** an animal that becomes non-ambulatory or otherwise unfit for transport while en route be taken to the nearest suitable place to receive proper care;
- **state** the requirements for provision of food, water, and rest at specific intervals;
- **state** the requirements for protection from adverse weather; adequate ventilation; use of proper containers and transport vehicles and the segregation of incompatible animals.

⁸ Jackie Wepruk, *Animal Welfare Law in Canada*, for Alberta Farm Animal Care (AFAC) Association, available at: <http://www.afac.ab.ca/lawsregs/awlcanada.pdf>.

⁹ Department of Justice Canada, *Health of Animals Regulations*, <http://laws.justice.gc.ca/en/showtdm/cr/C.R.C.-c.296//?showtoc=&instrumentnumber=C.R.C.-c.296>

CFIA's *Compromised Animal Policy* facilitates interpretation of the regulations. It states a compromised animal is one *with reduced capacity to withstand the stress of transportation due to injury, fatigue, infirmity, poor health, distress, very young or old age, impeding birth, or any other cause.*

Some compromised animals can be transported under certain conditions without being exposed to additional suffering. Others, such as non-ambulatory animals, animals with a body condition score indicating emaciation or weakness, or animals with severe lameness, would endure additional suffering during the transportation process and **must not** be transported except for veterinary treatment or diagnosis. This is true of any condition associated with pain that will be aggravated by transport (e.g., broken leg).¹⁰

Proposed Changes to the Transportation of Animals Regulations

There are several changes proposed by CFIA. The following are relevant to horses:

- **Double-decker trailers (also called pots) would be prohibited for the transport of horses;**
- Horses could be transported for a maximum of 24 hours (currently 36, but Code of Practice says 24 hours) before food, water and rest would be required;
- Specific conditions that render an animal unfit for transport would be clarified.¹¹

The Alberta Equestrian Federation, the Horse Industry Association of Alberta and the Saskatchewan Horse Federation have written CFIA in support of the ban on the use of double decker trailers to transport horses for any reason.

Consultations pertaining to these, and other proposed changes to the animal transport regulations have been ongoing. It is expected that the changes will be Gazetted in 2008.

Importation Rules for Horses (As of Feb.2008)

Under the Health of Animals Regulations Import reference document, section 5, if imported **horses are going directly to slaughter** they must be:

1. Accompanied by a USA-origin health certificate.
2. Inspected by CFIA at the border on entry into Canada. The load is sealed at this point
3. Licensed by CFIA to be taken directly from the border entry point to a federally registered slaughter plant. The transporter must proceed directly to the plant. The horses may only be transported to the plant designated in the license.
4. CFIA inspectors at the plant will open the sealed load upon its arrival.
5. ***The plant operator must slaughter the horses within 4 days of their arrival.***¹²

CFIA inspects imported US horses in **sealed loads** going straight to slaughter to maintain inspectional control regarding the humane transportation provisions of the Health of Animals regulations. CFIA simultaneously screens the horses for disease control purposes. But, **the primary reason for the inspection is to verify transport conditions and fitness for transport.**

¹⁰ CFIA website: <http://www.inspection.gc.ca/english/anima/heasan/transport/indexe.shtml>.

¹¹ CFIA website: <http://www.inspection.gc.ca/english/anima/heasan/transport/indexe.shtml>.

¹² Email communication from Gordon Doonan, CFIA Senior Staff Veterinarian Humane Transportation of Animals, Oct. 17, 2007.

Disease surveillance is not the primary reason for the inspections, because Canadian and US horse populations are deemed to have the same disease status by CFIA.¹³

Horses that are imported into Canada **for declared reasons other than immediate slaughter** must have:

- An approved negative test for Equine Infectious Anemia (EIA);
- An international health certificate from a veterinarian. This health certificate accompanying horses on entry into Canada, whether for immediate slaughter or for other purposes, **must contain a statement of fitness for transport** by a US Accredited Veterinarian. The statement must read, **"These animals have been inspected on (insert date, which must be within 30 days of export to Canada) and found to be healthy and fit for travel."**¹⁴

Canadian Border Services Agency (CBSA) staff collects a GST value, and checks for both a negative EIA test and import health certificate for these horses. CFIA does not inspect loads of horses entering Canada from the US that are not declared for immediate slaughter. These would include loads designated as feeders or riders.

NOTE: As of Dec.21/07 this has changed. CFIA now has the CBSA hold all double decker loads that have horses until they are inspected by CFIA.

The following outlines how the USDA regulations and CFIA inspections work together and where there are deficiencies or differences.

USDA Code of Federal Regulations

In 2001, the USDA instituted a law for the transport of horses for slaughter. It is contained in the USDA Code of Federal Regulations, Part 88: *Commercial Transportation of Equines for Slaughter* and is generally referred to as the 'US Rule.' **The US Rule prohibits the use of double decker trailers called 'pots' for transporting horses destined to slaughter and addresses the condition of horses to be loaded.** Only straight trucks, or single-deck trailers, are allowed to transport horses to slaughter. This enables inspectors to see all the horses and to provide the animals with adequate headroom.

The US Rule **only** addresses loads for slaughter within certain parameters. The regulation is applied to *"any individual, partnership, corporation, or cooperative association that engages in the commercial transportation of more than 20 equines per year to slaughtering facilities, except any individual or other entity who transports equines to slaughtering facilities incidental to his or her principal activity of production agriculture."*¹⁵

This rule does not apply to:

- Those hauling 20 or fewer horse per year to slaughtering facilities;
- Those transporting horses to slaughtering facilities where the activity is incidental to a primary activity of production agriculture (production of food or fiber);
- Loads of horses designated as 'feeders' or 'riders'.

¹³ Email communication with Gordon Doonan, CFIA Senior Staff Veterinarian Humane Transportation of Animals, Oct. 15, 2007.

¹⁴ Personal communication with Gordon Doonan, CFIA, November 29, 2007.

¹⁵ USDA, Federal Register, Part II, Vol. 66, No. 236, December 7, 2001, Rules and Regulations, (9 CFR Parts 70 and 88) *Commercial Transportation of Equines for Slaughter, Final Rule*

In essence, horses transported in accordance with the above three bullets do not have the same humane standard applied to their transportation as those destined for immediate slaughter via commercial transport.

Where the **US Rule does apply** there are several requirements for transport.

- Horses must have food, water and the opportunity to rest for not less than 6 consecutive hours prior to transport;
- Each horse must have a USDA ‘backtag’ applied;
- Complete and sign an owner-shipper certificate, which includes a statement of the horses’ fitness for transport;
- Humane loading, transport and unloading stipulations (includes no pots).

In Nov.2007, USDA stated it has identified a ‘gap’ and is proposing to amend the regulations governing the commercial transportation of equines for slaughter. ***“The proposed changes would extend the regulatory protections provided by the Commercial Transport of Equines to Slaughter Act (the Act) to horses bound for slaughter but delivered first to an assembly point, feedlot, or stockyard.”*** Comments are being accepted on the proposed rule changes until January 7/08.¹⁶ In a January 8/08 release, the American Horse Council stated it has told the USDA it supports the proposal to amend the regulations.

However, the regulations would provide an exception for owners/shippers that present “an official certificate of veterinary inspection and the original copy of a negative EIA test chart or other documents indicating the names and addresses of the consignor, consignee, owner and examining veterinarian for any equine being shipped, as evidence that the equines are not equines for slaughter.” This is the form noted in the Importation section in this chapter.

The USDA has no authority over the transport of non-slaughter horses; hence the USDA rule can only apply to slaughter horses.

According to the United States Animal Health Association’s (USAHA) Committee on Animal Welfare (CAW), the Federal regulation followed from peer-reviewed and published studies documenting that ***“the number of horses injured in double-deck trailers (29%) was greater than straight-deck (8%) trailers.”***¹⁷

NOTE: New York, Pennsylvania, Massachusetts and Vermont have state laws banning the use of double-deckers to transport horses for any reason.

As there are essentially no meat plants processing horses for food in the US, the proposed update to the Federal regulation is aimed at horses being exported to Canada and Mexico. However, the introduction of this proposal begs the question: why do US regulations only exist for the humane transport of horses, destined for slaughter within stipulated commercial conditions? There is still a gap.

¹⁶ American Horse Council website: http://www.horsecouncil.org/USDA_Proposed_Rules_Nov07.html

¹⁷ United States Animal Health Association, Committee on Animal Welfare, 2006 Report, Resolution 24: <http://www.usaha.org/committees/aw/aw.shtml>

CFIA Efforts and Interagency Cooperation

CFIA and the USDA have a shared enforcement agreement just for horses. The owner-shipper certificates for all imported non-compliant loads are sent to USDA for any required enforcement action. For example, **CFIA has no authority to reject double decker trailers from the US.** This is a US requirement. As long as an import shipment is in compliance with Canadian regulations, it is permitted entry into Canada.

However, CFIA informs USDA of observed non-compliance with their US Rule. USDA may take enforcement action as appropriate. CFIA takes enforcement action as appropriate and in accordance with Canada's Transportation of Animals Regulations. These currently allow the transportation of horses in **double decker trailers, but state that horses must have sufficient head room.**

CFIA visited Canadian horse slaughter establishments in 2006 & 2007, and confirmed that inspection staff is following proper inspection procedures at the plants. However, **CFIA recognizes that the increased volume of horses coming into Canada will provide additional inspection challenges.**

As CFIA does not inspect horses declared for purposes other than immediate slaughter, they are exploring options to improve their surveillance capacity to address humane transportation concerns arising from the increase in imported horses. For example, a new Canada/US/Mexico regulatory cooperation framework has been established. CFIA is seeking to strengthen this arrangement to better deal with the anticipated increased number of horses entering Canada from the US.¹⁸

CFIA only inspects sealed loads of horses (horses imported from the US for immediate slaughter in Canada). **Unless a complaint is made there is no inspection of:**

- US horses imported into Canada for purposes other than slaughter;
- Canadian horses transported within Alberta regardless of destination;
- Interprovincially transported horses regardless of destination.

Concerns have been raised from within the Alberta horse industry that loads of US horses, transported in **double decker trailers and** certified for purposes other than slaughter, are going briefly to a feedlot/assembly point or other location and then going to a meat plant. Some are suspected of going directly to a meat plant with holding yards. It is believed these horses are being transported in unacceptable conditions, and the rules are being circumvented to avoid inspection. The horses are crossing the border with a veterinary certificate and negative EIA test (required for the import of non-slaughter horses).

If the concerns being raised about horses from the US are founded, then this also raises concerns regarding US veterinary inspections for live animal exports.

The Alberta Equestrian Federation recently sent a letter to the federal Minister of Agriculture requesting that CFIA's inspection capacity be augmented to deal with the increased demand to inspect imported horses going directly or indirectly to slaughter.

¹⁸ Email communication from Genevieve Benard, CFIA, to Bill des Barres, Chair, Equine Canada Animal Welfare Committee, et al, October 3, 2007.

The Alberta Equestrian Federation recently sent a letter to the federal Minister of Agriculture requesting that CFIA's inspection capacity be augmented to deal with the increased demand to inspect imported horses going directly or indirectly to slaughter.

NOTE: As of Dec.21/07 this has changed. CFIA now has the CBSA hold all double decker loads that have horses until they are inspected by CFIA, even though these loads are declared for purposes other than slaughter. This is a very significant step.

Non-compliant loads (for humane reasons) are turned back and the USDA is notified. Now, to circumvent CFIA inspection, these US haulers are transporting the horse via double decker trailers to locations close to the Canadian border, unloading the horse onto single deck trailers and declaring them as feeders and riders to yet again avoid inspection and associated costs. CFIA indicates these loads are not going to the Alberta meat plant. This plant is in compliance with the Importation rules. The horses are going into Saskatchewan where the new horse meat plant is operating.

Federal Meat Inspection Act

The Meat Inspection Act and Regulations (Sections 61 – 80) set standards for the humane handling and slaughter of food animals in federally inspected abattoirs. CFIA inspectors, stationed at every federally registered abattoir, monitor the humane handling and slaughter of food animals.¹⁹

The law specifies that:

- Animals must not be handled in a manner that inflicts avoidable distress or pain;
- Sick or injured animals must be segregated and handled properly;
- All animals must undergo an ante mortem examination/inspection;
- All animals must be rendered unconscious prior to being bled with acceptable methods are stipulated;
- Holding pens must have adequate space and ventilation and all animals must have access to potable water and, if held for more than 24 hrs, feed.

Acceptable methods for rendering a horse unconscious include:

- Blow to the head with a penetrating or non-penetrating device;
- Exposure to gas that causes a rapid loss of consciousness;
- Application of an electrical current that causes immediate loss of consciousness.

The Alberta processing plant uses a 22 caliber firearm (a penetrating device) to render horses unconscious.

Food and Drugs Act

CFIA verifies that meat and poultry products leaving a federally inspected establishment are safe and wholesome. CFIA provides a report on and compliance summary for pesticides, agricultural chemicals, veterinary drugs, environmental pollutants and other impurities in Agri-Food

¹⁹ Canada's Farm Animal Welfare Infrastructure, CFIA website:
<http://www.inspection.gc.ca/english/anima/heasan/transport/infrastructuree.shtml>

Commodities of Animal origin. CFIA randomly performs drug testing, but cannot disclose the number of tests done per plant.

CFIA has three general categories for residue testing:

1. Monitoring (random sampling). The number of analysis usually revolves around a maximum of 300, which according to CODEX norms provides a 95% confidence interval for a 1% violation rate.
2. Directed – done when CFIA suspects that an issue may exist (e.g., antibiotics have been used recently).
3. Compliance – done when a violation has occurred, so as to verify whether a corrective action has been effective.

The drug residue tests conducted by the CFIA on horse meat (and other species) can be found at: http://www.inspection.gc.ca/english/fssa/microchem/resid/2004-2005/anima_mvlab.html - lab. Table 2 compares some drug residue test results for both beef and equine.

Table 2: Comparison of Drug Residue Testing for Equine & Beef

Drug Tested	2004/2005				2003/2004			
	Equine		Beef		Equine		Beef	
	N	%OK	N	%OK	N	%OK	N	%OK
Penicillin	149	99.33	162	100	-	-	-	-
Sulfonamides	304	100	377	100	359	100	491	100
Anthelmintics (Endectocides)	326	98.18	369	98.68	261	95.40	257	99.22
Zeranol (hormonal substance)	317	100	372	100	649	100	632	97.29
Pesticides (MRA) & PCB	261	100	262	100	231	99.13	314	100

CFIA found no residue of steroid and non-steroid anti-inflammatory drugs in any of the horses they tested.

75 times more horses are tested for drug residues than cattle (300 of every 100,000 horses compared to 4 of every 100,000 head of beef cattle). These results indicate that there is no significant issue with drug residues in horse meat.

Drug Residues and Withdrawal Requirements

It has been suggested that many horses ending up at a meat plant are ‘pet’ or performance horses, whose drug treatment histories are unknown and who may have been treated with drugs for which there is no established withdrawal time. Questions have been raised as to the food safety risks associated with horses that may have been treated with drugs before the decision was made to dispose of them.

In addition, if a drug residue issue is found to exist in horses, it may have broader implications. The integrity of the Canadian food safety system in general may be challenged.

This is not directly an animal welfare issue, but it may lead to welfare problems if:

- The decision is made to not allow ‘pet’ or performance horses into the human food system due to perceived food safety risks.
- Horses are not treated due to treatment making them ineligible for food use.

The European Union (EU) and CFIA have no standards or requirements in place for drug withdrawal times in horses processed for food. The EU focuses on hormone contamination rather than drug residues.

There is an expectation and assumption that veterinarians who prescribe drug treatments are advising their clients of withdrawal periods, or if a drug's use makes a horse ineligible for human consumption. It is essential for veterinarians to be cognizant of their responsibilities in this area. The labels of most drugs prescribed for horses include a disclaimer. **For example, "Horses treated with this drug must not be slaughtered for human consumption."**

When owners deliver their horses to the Alberta horse plant in Fort McLeod they are questioned about the drugs their horses may have received. The plant keeps a list of drugs that prevent horses from being processed immediately. In some cases the horse's veterinarian will be contacted for information on its drug history.

Marketplace demands dictate drug withdrawal times. Horses are held according to market requirements, type of horse and individual bringing the horse in (can the person's word be trusted). Depending upon the declared drug used, horses will be held between 10 and 45 days. Horses destined for higher end grocery stores in Europe are held for 120 days according to buyer requirements. Other buyers in Europe may require less or no holding time.

Horses arriving from the US that will be declared as 'Canadian' horses must be held in a feedlot for 90 days before they are considered domestic horses (CFIA Chapter 11, Annex A-2 of Solopeds, Section 10-2 pg 28 of the EU Export Regulations for Canada). This regulation only applies to the sale of pharmaceutical by-products, where product origin/nationality is a criteria of the purchasing country. This includes products like tendons for (sewing) and heart sacs for burn treatment.

As of Jan.2008, Canada's Veterinary Drug Directorate is setting up a *Horse as a Food-Producing Animal Advisory Committee* to examine drug withdrawal times for horses used for food.

Guidelines

- Canada's *Code of Practice for the Care and Handling of Farm Animals: Horses*, offers non-legislated guidelines for housing, management, transportation and processing.

The Codes are nationally developed guidelines for the care and handling of different species of farm animals. They are considered voluntary, but some provinces do reference the Codes within their provincial animal welfare legislation.

The equine industry Code of Practice was developed in 1998 and is available on-line through the National Farm Animal Care Council (NFACC) website (<http://www.nfacc.ca/code.aspx>). Equine Canada is discussing an update to the Horse Code.

The Code is publicly available and serves as a resource for all involved in the horse industry. Aside from general management practices, the Horse Code includes recommendations on:

- Feedlots
- Transportation
- Auction markets and sales

- Slaughter
- Euthanasia by firearms guideline.

Regarding transportation, Canada's Code of Practice for horses' states, "*each animal must be able to assume a natural stance standing with four feet on the floor and have a full range of head and neck motion without touching the deck or roof of the vehicle or container. As a guide, it is recommended that there be at least 2.5 cm (1 in.) of clearance for each hand of horse height at the withers.*"

Other items included within the Code's recommendations are:

- Only horses fit for travel should be considered for transportation. A downed animal arriving at a meat plant must be seen by a veterinarian and euthanized on the trailer.
- All horses arriving at auction markets should be inspected. Distressed or injured horses should be held separately and receive veterinary attention.
- Special facilities and segregation must be in place for sick, injured, crippled or disabled horses.

➤ **Humane Handling Guidelines**

AFAC together with its membership organizations, Alberta Pork, Alberta Milk, Alberta Beef Producers and Alberta Sheep and Wool Commission have developed Humane Handling guidelines for livestock. These booklets have been widely distributed and are used by producers, truckers, auction markets and meat plant inspectors and animal protection and transport inspection officers.

A priority for these livestock groups and AFAC is to reduce the number of unfit livestock entering the marketing system. Clear, defined guidelines have been developed by the industry stating what is humanely acceptable to load on a truck and what is not.

These guidelines are endorsed by all respective livestock organizations, the Alberta Veterinary Medical Association and the Alberta SPCA.

A similar guideline for horses is under construction by the Alberta Equine Welfare Group.

Compliance and Enforcement

Enforcement of Provincial Animal Protection Laws

The most important aspect of the animal protection law and regulations in Alberta, as it relates to rural Alberta and thus livestock, is that they are **consistently enforced**. Enforcement personnel (Alberta SPCA officers and RCMP) are funded by the Alberta government and not subject to raising funds from the public.

The Alberta SPCA has 8 officers in 4 locations in the province. Alberta also has 2 RCMP Livestock Investigators. Humane treatment of livestock and criminal action related to theft is a priority for these officers. Other inspection agents, including provincial meat inspectors, CFIA inspectors at auction markets and Livestock Identification Service (LIS) inspectors all are mandated to report any signs of animal neglect and contact the Alberta SPCA or the RCMP. **This interconnected approach to animal care is valuable resource in Alberta.**

A 2004 AFAC report on horse welfare found that most welfare complaints received by the Alberta SPCA pertained to horses.²⁰ This trend continues. Overall most welfare complaints were for horses in rural areas, followed closely by horses on acreages. There are two primary types of horse owners that are the subject of founded complaints:

- **Acreage** (less than ten acres) horse owners who are ignorant of basic horse care requirements, do not search out information on horse care, and require an easy to understand ‘recipe’ on horse care
- **Rural-based long-time horse owners** who have not updated their knowledge on horse care, do not adjust management practices for changing environmental conditions, and do not regularly monitor their horses.

Founded complaints revolve around:

- Fat and foundered horses
- Horses in poor or emaciated body condition
- Long hooves
- Old horses that are losing condition.

Where information is readily available on appropriate horse care, some owners appear to remain uninformed on horse care and unmotivated to learn. This information is consistent with more recent discussions with both RCMP and Alberta SPCA officials. Financial difficulties were also identified as a reason for horse owners to become neglectful.

In the winter of 2006/2007, the Alberta SPCA issued 10 warrants that resulted in 5 seizures totaling 70 horses and found 48 dead horses on private individual premises. The #1 problem associated with the seizures was absentee owners or caretakers (4 out of 7 serious cases). One case was related to financial distress, one case was lack of knowledge and one case was classified as disregard for the welfare of animals.

Horse owners have been identified as the primary source of welfare problems associated with horses arriving at abattoirs. Dr. Temple Grandin noted from an observational study, “77% of the horses with welfare problems were a direct result of owner neglect prior to shipment for slaughter.”²¹

Horse owners have been identified as the primary source of welfare problems associated with horses arriving at abattoirs.

Enforcement of Federal Laws

CFIA is the enforcement agency responsible for regulations pertaining to **humane transportation**, meat inspection, food and drug and importation regulations.

CFIA inspectors and veterinarians enforce the animal transport regulations through routine inspections, unannounced site inspections and response to reports of non-compliance.²² The regulations apply to all animals transported to any destination, including all federally inspected meat plant.

²⁰ Jackie Wepruk, *A Report on Horse Welfare in Alberta*, for Alberta Farm Animal Care Association, June 2004.

²¹ Temple Grandin, *A Perspective on Equine Slaughter from the Field*, summary of videoconference remarks, April 29, 2005.

²² CFIA website: <http://www.inspection.gc.ca/english/anima/heasan/transport/infrastructuree.shtml>

Recent infractions of the Health of Animals Transportation of Animals Regulations include inadequate headroom, inadequate ventilation, unfit horses on vehicles, more horses on a load than what is certified, and a lack of segregation.²³ The consequences imposed for these infractions of the law are unknown, but information from previous livestock fines indicates a fine level of \$500 to \$3,000 for overcrowding or causing undue suffering.

Enforcement Consistency and Capacity

Federal and provincial legislation provide the tools for addressing concerns relating to the humane treatment of horses. However, some, interviewed for this report, believe improvements are needed in how laws are enforced, including:

- Improved interagency communication and consistency
- Ensuring compliance through prosecution
- Improved/increased inspection capacity
- Improved clarity on standards of care.

Interagency and industry sharing of information (RCMP-SPCA-LIS-CFIA) needs to be strengthened. Agencies need to discuss welfare issues and develop a consistent approach for addressing them. Each agency has information that, if shared, would provide for more effective enforcement of existing legislation.

Effective enforcement requires clear standards. Changes to the Health of Animals Regulations were proposed, in part, due to challenges in securing convictions in the absence of clear standards.

Interagency sharing of information (RCMP-SPCA-LIS-CFIA) needs to be strengthened. Agencies need to discuss welfare issues and develop a consistent approach for addressing them. Each agency has information that, if shared, would provide for more effective enforcement of existing legislation.

The Alberta SPCA continues to advocate for clearer horse industry standards on snow as a water source in winter, and shelter requirements. The clarification of horse welfare standards was a recommendation from AFAC's 2004 *Horse Welfare in Alberta* report, along with providing the Alberta SPCA with additional enforcement tools, like specified penalties.

Summary

Canadian laws regarding animal welfare are in place. Livestock is not exempt. The laws are enforced with consistency and with sufficient funds in place to conduct daily inspections, carry out investigations of infractions and respond when crisis situations arise.

In Alberta, the government provides excellent funding to ensure the animal welfare is properly monitored and action is taken when animals are in distress. A very important aspect is not only one agency is involved. All inspectors with livestock related functions have a mandate to take action if they see an animal in distress and assist with emergencies involving livestock. This network, with its strong cohesive approach to animal welfare, is one of the horse industry's assets, that is often overlooked. Very few jurisdictions in North America have this.

²³ Communications between Gordon Doonan, CFIA, and Susan Church, AFAC, October, 2007.

The common denominator amongst all the players involved in the humane treatment of horses is the horse owner. Owner induced neglect is the core welfare issue facing horses. Horse owners choose (whether they are cognizant of it or not) the ultimate path for their horses. Without negligent horse owners there would not be neglected horses bought by dealers or arriving at auctions, feedlots and abattoirs.

Federal and provincial legislation, along with Codes of Practice, focus on the humane treatment of horses.

The **effective enforcement** of legislation deters wrongdoing, seeks compliance and upholds societal standards. Consistent, risk-based enforcement of

existing animal protection laws is vital. Where it is weak, which is the case being made in the US, those few who choose to, will not comply.

The common denominator amongst all the players involved in the humane treatment of horses is the horse owner. Owner induced neglect is the core welfare issue facing horses.

The actions of those who do not adhere to Canada's guidelines, laws and regulations for the humane care and treatment of horses, put the entire industry at risk.

CHAPTER 4

- A Description of the Horse Industry: Focus on Alberta

General Information

In 2003, the Alberta horse herd numbered approximately 300,000 animals. This is nearly one-third of the national herd (950,000) and more than any other province or territory.²⁴

Horses are owned and used for a variety of reasons, including breeding, sports, recreation, therapy, companionship, meat production and ranch work. According to a 2003 Alberta horse industry survey, in which respondents could make more than one selection as to how they use their horse, the **top five uses** for horses are:

- Sport-recreational riding (68.2%)
- Breeding (42.2%)
- Trail rides (40.9%)
- Companionship (31.6%)
- Ranch/farm work (24.9%)

According to this survey, 1% of horses were identified for primary use in meat production. The most popular breeds are quarter horses, Arabians, Thoroughbreds, Paints and Canadian Warm bloods.²⁵

The average horse owner is a female, 36-65 years old. The majority (76%) are interested in the sport/recreation aspect of the industry, rather than the business side.²⁶ The business end (24%) is

²⁴ Equine Canada, '2003 Canadian Equine Industry Profile Study', Vel Evans, Strategic Equine Marketing

²⁵ Horse Industry Association of Alberta: Industry Profile and Economic Impact Survey 2003, Research Division, Weststar Inc., <http://www.albertahorseindustry.ca/indsurvprof.html>.

²⁶ Ibid.

made up of breeders, feedlot owners, and dealers that make a living selling horses where markets are present. Note: these results do not necessarily represent a true breakdown of horse owners, but a breakdown of horse owners who answered this survey.

Horses in Alberta are generally sold for one of three reasons:

- dissatisfaction with the horse,
- the horse was bred to be sold,
- the owner is downsizing the number of horses owned.

There are a variety of sub-industries that support the horse owner by providing many services. These include veterinarians, feed stores, hay producers, processing plants, farriers, livestock transportation companies, real estate agents, auction markets and equipment/vehicle dealerships.

Feedlots

There are four primary feedlots for horses in Alberta. The main focus for two feedlots and a secondary focus for another lot, is live shipments of horses to the Japanese market. Two lots primarily channel horses through the federal abattoir in Alberta that exports boxed meat to the European market. Smaller feedlots are maintained by dealers/buyers who supply the larger feedlots and abattoirs. It is estimated that there are 20,000 horses in feedlots at any one time in Alberta.

Generally, feeders are kept for 60 to 80 days prior to going to the abattoir. Some horses are kept from 90 to 120 days depending on the customer/market demands for drug withdrawal requirements.

Feedlots owners that provide horses to the federally inspected abattoir may source their horses from:

- Buyers/dealers who access horses through auctions or direct referrals
- Owners directly bringing unwanted horses,
- First nations reserves
- PMU farms in Manitoba and Saskatchewan
- Purpose bred meat horses.

Raising horses for feedlots is part of production agriculture in Alberta, Saskatchewan, BC and Manitoba.

At the main horse feedlot in Alberta, pen checkers inspect the horses every day. A goose-neck trailer is used to take any lame or weaker horses directly to the abattoir, as soon as any problems are noticed. The feedlot is supervised by a local veterinarian who also oversees staff training regarding horse care.

One of the feedlots shipping to Japan was originally based in the US. Most of the operation was moved to Canada a few years ago, but mares and foals remain in the US. Approximately 30 loads of horses are shipped to the Canadian feedlot for finishing from its US location each year. A recent roll over in the US of a double decker trailer with horses was destined to this lot.

The feedlots shipping horses to Japan are dealing with a high value animal with strict market requirements. ***These horses are purpose bred and strictly raised for meat production.*** They have never been someone's riding pony, sport animal or draft horse.

These horses are free fed a high quality ration of hay and grain. Multiple feeders through out the pens allow horses' easy access to feed. The maximum density at one feedlot was measured at 1383 sq/ft per horse.

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Horses being flown to Japan are transported to the Calgary airport on a single deck trailer, with stocking densities well within those recommended by the Codes of Practice. The Calgary airport has specially designed facilities for handling horses and all horses and the loading is inspected by **CFIA**. Once at the airport, 3 - 4 horses are placed in a standard 10' x 12' crate, which is the same method used for sport horse transport purposes. The maximum number of horses on a flight would be 114, but usually the number is 83 – 103. There is one groom per flight to care for the horses. The horses are flown direct to Japan with one stop for fuel. In the past few years, approximately 5000 to 6000 horses/year are shipped from Alberta to Japan.

Once in Japan there is a 5 to 1 ratio of horses to caregivers. A captive bolt gun is used for stunning. No more horses are killed than can be consumed in 3 days, as the meat is eaten raw and thus highly perishable. By the time horses reach the dinner plate in Japan they are worth close to \$20,000 per horse.²⁷

Buyers/Dealers

It is difficult to ascertain how many horse buyers/dealers there are in Canada, but one abattoir uses six individuals for all of North America. All in Alberta are provincially licensed livestock dealers.

Two Alberta horse buyers/dealers provided information for this report. While each uses different sources for buying horses, both deal with horses that are no longer wanted by their owners. The owners have made the decision to dispose of their horse either through an auction or directly with a buyer/dealer. The feedback is illustrated in Table 3.

Horse dealer #1 primarily uses referrals (individuals call him directly), with auctions used as a secondary option. Horse dealer #2 primarily uses the auction system to acquire horses.

The aim was to assess if horses destined for the meat plant in Alberta, or now Saskatchewan, are fit animals, or animals with welfare problems. There was little consistency between the experiences of each horse dealer, which may reflect different methods for sourcing animals. In discussing the humane treatment of horses it is important to note that neglect or abuse can include *overfeeding* (i.e., hence the fat/founder category). The obese horse may not be seen as a welfare concern by some, but obesity can lead to significant health and welfare concerns.

It seems that horses bought through the auction system are more likely to have welfare problems. The dealer, who frequents auction markets, noted that in his experience horses are often in worse care in the hands of their prior owners than in feedlots.

²⁷ Interview with Glen Flewelling, June 5, 2007

Table 3: Condition of Horses Sold to Horse Dealers

Condition of Horse	Horse Dealer #1 % of horses dealt with	Horse Dealer #2 % of horses dealt with
Normal – no issues, just unwanted by their owners	60%	20%
Fat/Foundered	5%	20%
Skinny	1%	20%
Injured/Deformed	13%	20%
Wild	0%	20%
Behaviour Problems	5%	0%
Older animals, otherwise healthy, but perhaps an old injury makes them unusable for riding	16%	0%
Other	5%	0%

Alberta SPCA and RCMP Livestock Investigators have received a few welfare complaints regarding individual buyers/dealers, but evidence to support further investigation has generally been lacking. The issue is focused on dealers attempting to make financial gains from unfit horses.

Horses may arrive at the private feedlot of a buyer/dealer in poor condition. The buyer will aim to improve the animals' condition, and hence value. However, horses deprived of adequate food and water by their original owners, may still deteriorate even when offered quality rations and proper care. Approximately 20% of severely malnourished horses can be expected to die in spite of reintroduction to feed. In addition it may take six to ten months of care for severely malnourished horses to reach average body condition.²⁸

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The buyer/dealer uses his discretion to accept horses that he believes will yield a profit.

'Adopt-a-Horse' Facilities

A quick internet survey shows seven locations in Alberta claiming to rescue horses and adopt them out. Only one has been toured by a member of the Report Committee. There are no guidelines, codes or inspections of these facilities. There are of course, subject to the Animal Protection Act. Money to operate comes from public donations and the sale of horses. Horse owners choosing to either leave their horse with one of these facilities or someone who chooses to buy/adopt a horse is encouraged to investigate the owners and the facilities.

Auction Markets

Auction markets have been identified by some as a key entry point for unfit (weak, injured and lame) horses.

²⁸ Whiting, Terry et al, Chronically Starved Horses: predicting survival, economic and ethical considerations, Canadian Veterinary Journal, 2005: 46: 320-321.

Some auction markets in Alberta have specialized horse only sales. Sometimes horses are sold at regular auction that includes other livestock. **Alberta Livestock Identification Inspectors (formerly called Brand Inspectors) attend every sale.** Not only do they check for ownership verification but they are expected to adhere to policy protocols to reporting any animal neglect or the transport of unfit livestock. All auction markets are public and are thus subject to random inspections by the Alberta SPCA.

CFIA inspectors attend beef cattle sales at the auction markets and they too, are responsible for taking action on any livestock, including horses that may arrive in an unfit condition.

If horses do arrive at a sale in poor condition and are not fit to go through the ring, they are tagged by the auction market staff and must go direct to the abattoir. It is the owner's responsibility to deliver the animal to the abattoir. For severe cases, the SPCA and or RCMP are notified.

Owners who bring horses to auction markets have options for how their horses go through the auction ring. Loose horses are run through the ring and usually have no training. Meat buyers usually purchase loose horses. Horses can be led through an auction by a person and are considered 'halter broke'.

Individuals consulted for this report suggested that gate people at the auctions need training to ensure unfit horses are not unloaded and sold at the auction. A province wide training course has been suggested to ensure that standards are upheld and appropriate measures are taken when horse welfare is compromised. **Humane handling guidelines**, like those for other species, would be useful in this situation.

Transporters

There is a continuum of horse transporters from commercial haulers to individuals with smaller horse trailer. Some commercial horse transporters only haul horses. Others also haul other livestock species and are not horse specific haulers. A significant concern in horse transport is the use of two-tier (double-decker) trailers or 'pots.'

According to the CFIA, about **250,000 horses are trucked across the US/Canada border each year.** Alberta only numbers are not available. The total number includes performance horses that can make multiple crossings, feedlot horses, and import purchases of recreational/sport horses. Horses are also imported from other international regions (Europe) for sport/recreational purposes.

In 2006, 24,866 horses were imported direct to Canadian abattoirs (sealed loads) from the U.S See Table 4 for more details. This number does not include horses that may have been imported to Canadian feedlots for finishing prior to processing. **New information as of January 8/08, says the number of horses shipped from the US to Canada has increased by 40% (over 2006 totals) just from October to December 2007.**

In Alberta, anyone who hauls livestock must have a manifest. The benefit of a manifest from a livestock welfare perspective is to identify the responsible party at the time the animals are in transport and as a theft prevention initiative.

The new Certified Livestock Transporters (CLT) training course, offered by AFAC, includes a horse module. Bouvry Exporters have trained staff to deliver this course. This module is compatible with the USDA horse transporters training manual.

Meat Processors/Abattoirs

In Canada, there are 6 federally inspected meat plants authorized to kill horses. Of these, 2 are in Quebec, one is in Saskatchewan, 2 are in Alberta but one does not kill any horses as yet, and one in BC that kills only a few per week.

Table 4: Horses arriving at Canadian federally registered slaughter plants (source CFIA)

YEAR	TOTAL ARRIVING	USA-ORIGIN* (direct to slaughter-sealed loads)	# DEAD ON ARRIVAL	% DEAD ON ARRIVAL (DOA)
2001	66,255	22,326	53	0.08
2002	65,029	23,796	54	0.08
2003	59,853	21,269	24	0.04
2004	51,610	17,535	24	0.05
2005**	48,715	15,672	13	0.03
2006**	50,242	24,866	9	0.02

*Data does not include USA-origin horses imported to Canadian feedlots

**Approximate numbers as not all data may be entered into CFIA's database

The Alberta federally inspected and EU approved facility has the capacity to handle 240 horses/day and has averaged 50,000 head per year for the last 5 years; a major portion of the horses processed for food in Canada, up until now.

Horses arriving at the **Alberta abattoir** come from the plant owner's feedlots in Alberta and in Shelby Montana, from other feedlots, from individual horse owners and buyers/dealers. All US imported horses come declared as slaughter only and are in sealed straight trailers that are inspected at the border by CFIA.

Dr. Temple Grandin has conducted a private audit at this plant in 2005, paying particular attention to **handling facilities and handler practices and stunning insensibility scores**. She noted 100% insensibility. And, senior CFIA veterinarians have toured this plant as recently as 2007 to ensure all humane standards are met or exceeded.

The owner of the Alberta abattoir **offers a direct delivery to plant service**. Often, owners feel more comfortable taking their horse themselves to ensure careful transport for their horse. This especially applies for aged or lame animals that, under CFIA regulations, need to be shipped directly to a meat plant. The horse owner can call the plant, asks for a delivery time and delivers his/her horse and supervises its handling and immediate euthanasia.

A horse may be sent directly to the abattoir if its owner deems it as a risk to other horses or humans with respect to behavioural problems.

All horses, including those delivered directly, are inspected by a CFIA veterinarian before being off-loaded. If the horse is considered unfit, it is euthanized on the truck and the owner must stay until after the horse is dead. At this time, the owner is not charged for this expense.

As of February 2008, estimates for total horses processed at meat plants in Canada now exceed **100,000 for 2007**. The horse plant in SK is processing 240 horses/day and of these, 80 to 100 are from AB and 140 are from the US.

Since starting this Report, the abattoir in Saskatchewan originally built for cattle, is now operating as a horse only facility. It is federally inspected. Cavel International, the company with horse slaughter plants in the US that have been closed, controls the operations at this SK plant. It is assumed that the 40% increase in horses coming into Canada is going to this facility, as the Alberta plant is running at capacity.

In an effort to reduce unfit animals in the marketing system, AFAC conducted a study that investigated the number of downers (i.e., an animal that cannot rise, remain standing or walk without assistance – including DOA's) arriving at processing plants in Alberta from 2003 – 2005. In 2003, downers were .14% of the total horses processed in Alberta. In both 2004 and 2005 downers were .05% of horses processed. The report noted that issues around fitness for transport had been addressed by CFIA inspectors, likely leading to the reduced downer numbers.²⁹

The Alberta horse herd is in excess of 300,000. The actual number of horses in Alberta that are shipped to meat plants, die of natural causes or are euthanized each year is unknown. HoClaude Bouvry, the owner of the Alberta abattoir, estimates that he receives about 25% of the total horses culled in Alberta at his meat plant. The 2003 Alberta horse industry survey indicated at 35.2% of horse owners delivered or shipped their horses to the meat plant, 25.7% euthanized their horses, while 22.8% sold their horses through auctions, some of which would then go to a meat plant.

Of the 50,000 horses processed at the Alberta plant, approximately 25,000 originate from US, 15,000 come from Manitoba, Saskatchewan and BC and 10,000 are Alberta horses. One third of all the horse processed at this plant are purpose raised horses, not culls or unwanted horses.

Horse Meat Exports

Alberta's exports of horse meat have remained relatively consistent over the last ten years. The table below documents Alberta's horsemeat exports in tonnes and dollar value from 1996 – 2006.³⁰ These numbers do not include purpose raised meat horses for live export shipment, a value of \$16.9 million/year.

Table 66: Alberta Horse Meat Exports by Destination, 1997-2006

	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006
Quantity - tonnes										
Europe.....	7,246	7,323	6,121	5,504	7,180	5,989	5,410	5,300	4,793	4,175
Japan.....	5,110	5,081	4,846	3,947	3,595	2,222	2,283	3,041	3,245	3,163
United States.....	23	0	0	40	86	18	21	0	0	0
Other Countries.....	254	106	0	377	383	356	1,413	1,522	1,728	1,454
Total.....	12,633	12,510	10,967	9,867	11,244	8,585	9,127	9,863	9,766	8,792
Value - \$'000										
Europe.....	41,492	42,744	39,076	33,829	47,421	38,043	31,307	31,366	28,488	25,880
Japan.....	17,466	19,452	19,347	17,192	17,095	12,952	11,347	13,825	16,752	15,817
United States.....	23	0	0	44	189	18	19	0	0	0
Other Countries.....	407	305	0	612	744	626	1,895	2,675	3,067	2,372
Total.....	59,388	62,501	58,422	51,677	65,460	51,639	44,568	47,866	48,307	44,069

Source: Statistics Canada; and Alberta Agriculture and Food, Statistics and Data Development Unit

²⁹ Faunus Consulting, Downer Benchmarking Study Final Report, for Alberta Farm Animal Care (AFAC) Association, October 2006.

³⁰ Alberta Government website: [http://www1.agric.gov.ab.ca/\\$department/deptdocs.nsf/all/sdd10294](http://www1.agric.gov.ab.ca/$department/deptdocs.nsf/all/sdd10294), (visited on Oct. 26, 2007)

Economic Contributions of the Horse Industry (Canada & Alberta)

The following are some examples of the economic contributions of the horse industry.

- Total direct expenditures on horse care in Canada is **\$2.9 billion/year**.³¹
- 120,000+ adults and children participate in equine activities in Canada.³²
- Horse activities and horse care generate **35,000 full time jobs** in Canada.³³
- Estimated dollar amount to keep one horse per year in Alberta = **\$3,522**. This includes bedding, farrier, feed, grooming, shelter, tack & equipment, and vet care.³⁴
- In 2006, Alberta's meat exports to the EU were primarily horse at 60%, pork at 24% and bison at 14%.
- In Alberta, horses processed for human consumption generate at least \$50 million/year.
- In 2006, Alberta's total horse meat exports amounted to **\$44.1 million**: \$25.8 m to Europe, \$15.8 m to Japan and \$2.3 m to other countries.³⁵
- Alberta's annual exports of live horses to Japan is approximately **\$16.9 million**.
- There are no government support subsidies or supplied managed controls for the marketing of horse meat.
- To compare economic drivers, rodeo events in Edmonton generate \$100 million, the Oilers hockey team reportedly generates \$135,000,000 for the city of Edmonton.

CHAPTER 5

- Current Dispatch & Disposal Options

Dispatch Options

There are currently three common methods for humanely ending the life of a horse:

1. **Veterinary Euthanasia:** In Alberta the average cost to euthanize a horse using a veterinarian is approximately \$100 - 200 depending on the mileage. This includes professional fees and the cost of drugs. It does not include the added cost of disposal.
2. **Euthanasia at an Abattoir:** Horses may be taken to a federally inspected plant. There are no provincial plants that accept horses for slaughter in Alberta. Horses are inspected, and a price per pound is established based on body condition. An average 1,000 lb Quarter horse type light horse in good condition will bring between 35-40 cents per pound live weight or \$350 to \$400 dollars. As noted, at the Alberta abattoir, horses may be euthanized immediately at the owner's request.
3. **Euthanasia by firearms:** The Code of Practice for the care and handling of horses provides a guideline for using firearms to dispatch horses. The use of firearms is qualified: *"Shooting a horse should only be done by persons well versed in handling firearms and licensed to use firearms and only in jurisdictions that allow for firearm use."*³⁶

³¹ Equine Canada, '2003 Canadian Equine Industry Profile Study,' Vel Evans, Strategic Equine Marketing

³² Ibid.

³³ Ibid.

³⁴ Horse Industry Association of Alberta: Industry Profile and Economic Impact Survey 2003, Research Division, Weststar Inc. (<http://www.albertahorseindustry.ca/indsurvprof.html>)

³⁵ Alberta Government website: [http://www1.agric.gov.ab.ca/\\$department/deptdocs.nsf/all/sdd11871](http://www1.agric.gov.ab.ca/$department/deptdocs.nsf/all/sdd11871), (visited on Feb. 4, 2008)

³⁶ Code of Practice for the care and handling of farm animals – horses, available at: <http://www.nfacc.ca/code.aspx>.

Disposal Options

Disposal options in Alberta include:

- natural disposal
- burial
- rendering
- composting
- incineration.

On-farm carcass disposal options (natural disposal & burial) are controlled through the Destruction and Disposal of Dead Animals Act in Alberta. Both options must meet several environmental conditions in order to be acceptable.

Natural disposal means disposing of a dead animal to allow for scavenging. If a horse has been chemically euthanized by a veterinarian, the carcass poses a significant poisoning risk to scavengers. The carcass may also be a risk to contaminate drinking water depending on the proximity of the water table or watershed.

The on-farm burial option requires the use of large earth moving machines. The cost of burial is dependant on location and the availability of machines and operators. It is reasonable to expect a minimum \$200 burial fee.

Any animal that is confirmed or suspected of dying from an infectious or reportable disease must be disposed of in accordance with the federal Health of Animals Act or Alberta's Livestock Diseases Act.³⁷

West Coast Reduction Services (WCRS) Ltd in Alberta offers carcass pickup services. This company then renders the dead animal. Deadstock removal currently costs 6.5 cents per pound or \$65 plus GST for an average 1000 pound horse. Deadstock is not always removed in a timely fashion and owners may be forced to deal with a carcass for several days. For example, WCRS only picks up from the west side of Highway #2 on Mondays and Thursdays. It does not pick up on weekends.

Rendering is the industrial process of cooking down raw materials (carcasses) and turning them into finished products such as protein and fat meal for livestock feed additives, fertilizers, pet food and other industrial applications. Inedible horse material is mixed in with other ruminant inedible material that is sold as fat or protein.

On-farm **composting** may not be used for animals weighing more than 100 kg each. Horse carcasses may be taken to a Class 1 compost facility. Landfills that accept carcasses have a drop off charge.

Incineration (burning of the dead animal) may occur if done in accordance with the *Substance Release Regulation* (AR 124/93) or the Code of Practice for Small Incinerators. This is generally not a viable option for horse owners in Alberta.

Regardless of the disposal method, the owner of a dead animal must dispose of the animal within 48 hours of its death. If this is not feasible, storage conditions are stipulated under provincial and federal legislation.³⁸

³⁷ Government of Alberta website: [http://www1.agric.gov.ab.ca/\\$department/deptdocs.nsf/all/rsb10366](http://www1.agric.gov.ab.ca/$department/deptdocs.nsf/all/rsb10366)

Aside from euthanasia at an abattoir that pays a horse owner, all other methods of dispatch and disposal have associated costs and limitations – particularly related to carcass disposal. The availability of economic and environmentally sound disposal options is limited.

- **The fees associated with chemical euthanasia by a vet and burial on-farm (hiring a backhoe) is approximately \$300 - 400.**
- **A horse euthanized by a vet and disposed of through rendering, may cost the owner \$169 - 269.**
- **Dispatch by firearm and on-farm burial using one's own equipment is the only option with minimal expense.**

CHAPTER 6

- US Action Opposing Horses as Food Producing Animals

The push to stop processing horses for food in the US essentially began in the late 1990's. It has been very successful in raising the profile of this practice as inhumane and un-American. The advancement of the American movement is having an impact in Canada. It is expected to escalate especially as activists accomplish their goals in the US.

The US activists opposing horses as food animals state:

1. Horses helped to build this nation; therefore their place within our culture is special and they cannot be categorized as food animals. It is un-American.
2. Horses are companion animals, not livestock (they may be seen as more intelligent than 'regular' animals raised for food).
3. The processing of horses for food is inherently inhumane from transport to dispatch at the plant.³⁹

The US Players Opposing Horses as a Food Source

The Humane Society of the United States (HSUS) is a key horses as a food opponent in the United States. HSUS has launched several major publicity campaigns and lawsuits against the horse meat industry. It is also very active in responding to any media reports supporting processing horses as a humane disposal method.

There are several other major activist players including 'The National Horse Protection Coalition' and 'Equine Advocates'. For a more complete list of opponents to horses being processed for food in the United States go to www.endhorseslaughtering.com/supporters.asp.

Other activist groups, including People for the Ethical Treatment of Animals (PETA) and Animal Angels, actively oppose horses being processed for food. Animal Angels recently issued a report based on tracking the movements of horses trucked from the US into Canada.⁴⁰ CFIA has

³⁸ Ibid.

³⁹ Animal Welfare Institute, Animals in Agriculture, http://www.awionline.org/othercampaigns/horse_slaughter.htm, (visited Aug. 5, 2007)

⁴⁰ Animals' Angels USA, *Investigation into the transport of American horses to Canada for slaughter – External Report*, January – March, 2007

countered its claims against the Canadian industry and there is evidence that parts of the Canadian video footage was spliced in.

Support for banning horse going to meat plants also comes from within the horse industry (www.horse-protection.org/about/friends). There is a strong equine rescue and retirement faction that supports a complete ban on horses going to meat plants along with many owners, trainers and associations in the Thoroughbred and Standardbred racing industries.

Comparatively, Canada has fewer high profile activist groups opposing horses going to meat plants than the US. Some include the *Canadian Horse Defense Coalition* (defendhorsescanada.com) and *Help Horses* (helphorses.com). However, a ban in the US will likely have major opponents in the US turn their focus towards Canada and push for a Canadian version of the **American Horse Slaughter Prevention Act**.

History of US Opposition to Horses as a Food Source

The opposition began when two high-profile horses had their lives ended by being killed at a meat plant.

First was Exceller, who won \$1.64 million in stakes races across Europe and North America, including the 1978 defeat of Triple Crown winner Seattle Slew in the Jockey Gold Cup. Exceller was sent to an abattoir in Sweden in 1997 after his retirement from the racetrack. When reports of his demise hit mainstream media outlets, outraged horse lovers called for the shutdown of US horse meat plants and for the establishment of rescue agencies for unwanted horses.

In 1998 California became the first North American jurisdiction to make it illegal not just to kill a horse for human consumption, but also to transport that horse elsewhere to be killed at a meat plant.

In 2003, Ferdinand, the winner of the 1986 Kentucky Derby, was killed at a meat plant in Japan. This resulted in a new wave of appeals to ban horse meat plants in the US and to establish horse rescue agencies.⁴¹

Both federal and state initiatives have now been introduced to ban horse meat plants. It is the State legislative initiatives that have been successful to date, essentially leading to the closure of horse meat plants in the US.

In 2007, local lawmakers in Texas (in January/07) and Illinois (in March/07), wrote new ordinances and began enforcing old laws in an attempt to shut down plants in those states.⁴² The January 2007 Texas ban reaffirmed a 1949 ban on the consumption of horse meat. Both the Texas and Illinois plants have made repeated appeals at state and federal levels to no avail.

The last plant, in Illinois, has been opened and closed based on appeals since March 2007. As of October 1st, 2007 the Illinois plant is closed. The plant has two legal appeal options left: 1) an

⁴¹ International Fund for Horses website: <http://www.fund4horses.org/info.php?id=847>, (visited on Aug. 15, 2007)

⁴² HSUS, http://www.hsus.org/press_and_publications/press_releases/federal_court_usda_inspection_horse_slaughter.html, (visited Aug. 15, 2007)

en banc review with all judges of the Seven circuit hearing the appeal or, 2) the plant owners may appeal directly to the supreme court of the US (www.thehorse.com Article #10439).

Federal Bills have also been introduced.⁴³ A federal spending bill passed by the US Congress in 2005 ceased funding for the inspectors required by law to supervise the slaughter of horses in the US. Without inspectors, supporters of the bill believed horse abattoirs in the US would have to close. However, the three remaining abattoirs (at that time) did remain open for 2006. USDA inspectors were paid for with private funds in a 'fee for service' rule.

In September 2006, the 109th sitting of congress closed without passing the American Horse Slaughter Prevention Act. In January 2007, federal legislation to ban the slaughter of American horses was reintroduced in the 110th sitting of congress. As of October 1, 2007 both bills are still in committee.

Those opposed to the regulated and inspected humane killing of horses at a meat plant have been successful in reducing the number of federally licensed horse meat plants in the US from a high of twenty to zero.

These groups have focused most of their energy on horses that served another purpose before being killed for meat. Some potential reasons for this include:

- Horse welfare complaints and problems are primarily associated with horses not raised for their meat. Welfare issues start with horse owners, but neglected horses may be carried through the system until they reach a meat plant.
- Feedlots for purpose bred meat horses have not been the source of welfare issues. These feedlots cater to export markets, meeting specific criteria that require good animal husbandry;
- Purpose bred meat horses do not have names, nor have they served humans in another role.

Those supporting horse meat plants as a humane alternative say there are not enough homes for unwanted horses and that banning horse meat plants as a humane alternative to end a horse's life will increase the number of neglected horses. However, the following excerpts are rebuttals of the American Veterinary Medical Association's (AVMA) policy on horses as a food producing animal. These rebuttals illustrate the view of horses as companion animals, along with providing possible insights into why in the US the ban has gained traction.

- *"While we agree that some horses need to be put down because they are ill or dangerous, we don't believe they should be killed so that their owner may eliminate a financial burden or recoup part of a loss through the sale of the horse for its meat."*
- *"Over breeding results in many good, healthy horses being sold at prices that are low enough to attract the killer buyers..."*
- *"The market for slaughter horses is set by the international demand for their meat...and not by the number of 'unwanted horses'."*
- *"...the supposition that slaughter relieves abuse and neglect is not supported by the historical record..."*
- *"...they [AVMA] support a very real and documented torture of our horses [exported to Mexican and Canadian plants] on the basis that they might otherwise be abandoned and neglected..."*

⁴³ GovTrack.us – tracking the 110th United States Congress, www.govtrack.us, (visited on Aug. 15, 2007)

- “...this year the Texas legislature toughened its laws on animal cruelty but left in place an exemption for livestock. An attempt to get horses included under the enhanced protection was defeated by the agricultural interests with support from the AVMA”
- “In a recent FOIA request for humane violations at the Cavel plant, the USDA states that they could find no record of violations for the past two years.” Examples of allegedly known and publicized violations were given.
- “...take away the financial incentive that slaughter provides and then...back rigid enforcement of existing cruelty laws. We cannot wish our way out of abuse and neglect any more than we can slaughter our way out of it.”⁴⁴

To summarize those in the US opposing horses going to meat plants say:

- Horses are companion animals;
- Making money from excess horses that are the result of over production by breeders is unacceptable;
- Neglected horses already exist, but animal welfare rules are not being enforced;
- Industry and AVMA have stood against any proposed improvements;
- Slaughter offers a financial incentive that does not deter neglect;
- Horses as having an elevated status compared to other livestock.

Current Situation

Horses are no longer being processed for food in the United States. However, they are being transported in higher numbers to meat plants Mexico and Canada. As a result, there has been renewed pressure in the US to pass federal legislation that would ban both the horse meat plants and the transportation of horses to meat plants. The aim is to eliminate the export of horses to other countries where horses processed for food purposes remains legal.

CHAPTER 7

- Consequences of the Ban Closure of Horse Meat Plants

The United States

A 2006 US report by the Animal Welfare Council on ‘*The Unintended Consequences of a Ban on the Humane Slaughter (Processing) of Horses in the United States*’ provides key insights that are likely relevant to Canada.

The report outlines potential impacts on horses, the horse industry and the economy as a result of a ban on horse slaughter. They are:

1. Increased numbers of abandoned or unwanted horses, leading to increased welfare problems;
2. Increased expenses associated with maintaining unwanted horses by rescue facilities and individuals. No funding has been allocated to care for unwanted horses as a result of bans.

⁴⁴John Holland, Horse Talk on-line magazine, *Frequently asked questions about unwanted horses and the AVMA's policy on horse slaughter*, www.horsetalk.co.nz/features/horseslaughter-132.shtml (visited Nov. 20, 2007)

3. Environmental impact of horse euthanasia and carcass disposal;
4. Revenue loss from the sale and export of horsemeat.⁴⁵

The report states that many horses at processing plants are in poor condition, indicating a general state of owner neglect. This does not correspond with Dr. Temple Grandin's 1999 report. She studied 1,000 horses at slaughter facilities in the United States and found that 92% were in acceptable condition. "Eight percent of these horses had some sort of significant welfare problem, including trauma, or emaciation. 77% of the horses with welfare problems were a direct result of owner neglect prior to shipment to slaughter."⁴⁶

Examples of owner induced welfare problems include severely foundered feet, emaciated, skinny, weak horses, non-ambulatory animals, and injuries to the legs such as bowed tendons.⁴⁷

The report says processing plants assist in maintaining horse welfare by providing a euthanasia choice. By providing owners with financial compensation for poor quality and neglected horses, the meat plants are likely preventing horses from continuing to suffer from neglect. Removing the financial compensation provided to owners by closing horse slaughter plants will contribute to the continued neglect of privately owned horses.

The Unwanted Horse in the United States

In 2004, Dr. Nat T. Messer described the plight of the unwanted horse at the American Association of Equine Practitioners' annual convention and within the proceedings.⁴⁸ Messer described unwanted horses in the United States as ranging "from being essentially normal, healthy horses of varying ages and breeds to horses with some type of disability or infirmity." This includes horses that are unattractive, or fail to meet their owner's expectations, and horses with non-life threatening diseases, or behavioral problems. Feral horses were also considered unwanted/unadoptable.

According to Messer, nearly 100 horses either die or are euthanized in the US for every 50 horses that go to slaughter. Various equine organizations and individuals provide care, or new homes, for unwanted horses. However, the carrying capacity of these rescue efforts cannot accommodate the numbers of unwanted horses in existence. "Whenever there are large numbers of unwanted horses, there is always concern for the welfare of these horses."

Messer outlines several potential causes of horse neglect:

- Increasing numbers of uninformed horse owners unfamiliar with proper horse care;
- Economic constraints created by the downturn in the economy since 9/11;
- Lack of affordable ways to responsibly dispose of unwanted horses.

The conclusion was that eliminating horse meat plants as a disposal option is likely to increase the number of unwanted horses, and hence the number of neglected horses. Animal welfare problems can reasonably be expected to increase under these circumstances.

⁴⁵ Animal Welfare Council, *The Unintended Consequences on a ban on the humane slaughter (processing) of horses in the United States*, May 2006, available at www.animalwelfarecouncil.org.

⁴⁶ Temple Grandin, *A Perspective on Equine Slaughter from the Field*, summary of videoconference presentation, April 19, 2005.

⁴⁷ Temple Grandin, K. McGee, and J. Lanier, *Survey of trucking practices and injury to slaughter horses*, 1998 <http://www.grandin.com/references/horse.transport.html> (visited on Nov. 30, 2007)

⁴⁸ Nat T. Messer, *The Plight of the Unwanted Horse*, AAEP Proceedings, Vol. 50, 2004.

The closure of US horse meat plants has resulted in horses being transported further distances to meat plants. Horses are being transported to Canada and Mexico.

According to a Jan/08 communiqué from the American Veterinary Medical Association (AVMA) the USDA reports **44,475** US horses have been exported for slaughter to Mexico as of December 20, 2007. In 2006, only 10,783 horses were exported for direct to meat plants for the entire year. **This is a 312% increase.**

Attention has focused on inhumane and unregulated practices in some Mexican abattoirs.⁴⁹ The killing practice is described as one where horses are paralyzed with knife stabs to the spinal cord, followed by being hoisted (still conscious) with chains attached to a hind leg, before having their throats slit. The media has focused its attention on this small segment of the horse meat industry and represented it as reflective of North American standard practices. The extent to which this is representative of the situation in Mexico is unknown.

This type of killing practice is illegal in Canada (and the United States), as animals must be rendered insensible prior to bleeding. Dr. Cordes, National Coordinator Equine Health and Slaughter Horse Transport for USDA, says the plants in Mexico that have been the focus of activists are small, un-inspected local plants. These are not the EU approved federal plants in Mexico.

Some other impacts are being realized now that horse meat plants are closed in the US. A recent media article from Texas, dated Nov. 19th, quotes Gary Conway of the Texas American Quarter Horse Association saying “We are hearing stories from all over of people abandoning horses” at livestock sale yards and ranches.

Canada

The ban on horse meat plants in the US has resulted in an increased number of US horses being exported to Canada, presumably to meat plants. One new horse plant has opened in Canada (in Saskatchewan) in 2007 and is reportedly processing 240 horses/day. The existing Alberta plant is already operating near capacity so is not accommodating more US horses.

The same AVMA communiqué says that 35,000 horses were sent to Canada for slaughter in 2007, a 41 % increase from 2006.

However, it is difficult to assess the numbers as CFIA only inspects sealed loads of horses entering Canada from the US. Horses can enter Canada with an approved negative test for Equine Infectious Anemia (EIA) and an international health certificate. These horses enter Canada for declared purposes other than immediate slaughter, and hence avoid CFIA inspection (see Chapter 3, Laws and Guidelines). **The welfare status of these horses is unknown and unverified through inspection by CFIA. These horses are being channeled through feedlots and subsequently end up Canadian plants.**

Dr. Cordes has confirmed in October 2006 that veterinarians in the northern states are reporting an increase in the number of requests for EIA testing of large loads going to Canada for purposes other than slaughter. He also states that major haulers of horses for slaughter to Canada that

⁴⁹ The Horse.com, www.thehorse.com/ViewArticle.aspx?ID=10559, (visited on Oct. 18, 2007)

consistently use straight trucks or single-deck trailers have reported seeing more trucks with two tier decks (pots) at horse assembly points in the US.

Horses are entering Canada under false pretences and in unacceptable conditions. See chapter 3 for a full description of this problem.

The length of time in transit (from US locations to Canadian unloading) is unknown and is an issue. CFIA can only account for time in transit while in Canada

A ban on horse meat plants in the US puts the spotlight on the Canadian industry. Deviations from acceptable practices are likely to increase the pressure for a similar ban here.

A ban on horse slaughter in the US has resulted in an increased number of horses entering Canada for slaughter and puts the spotlight on the Canadian industry. Deviations from acceptable practices are likely to increase the pressure for a similar ban on horse slaughter here.

A Canadian ban on horse meat plants would likely exacerbate the potential impacts identified in the US Animal Welfare Council report.

A drop in the economic value of horses would likely aggravate owner neglect issues already identified. Economic constraints are often identified as the primary reason surrounding neglect.⁵⁰

The dispatch and disposal of unwanted horses also has an associated cost. There is a risk that neglectful owners who are unwilling to bear the resulting expense may not humanely euthanize their horse in a timely manner. Enforcement agencies would be ill equipped to address the anticipated increase in welfare complaints. Efforts would be required to ensure horses are properly euthanized with appropriate carcass disposal.

There is no national plan or budget in Canada or the United States to humanely manage excess numbers of horses or to provide rescue agencies with financial support. It has been estimated that 2700 rescue facilities would be needed in the US to handle unwanted horses.

Media reports on the inhumane treatment of horses at abattoirs in Mexico have, by default, included Canadian plants. Canadian plants follow federal legislation that requires an instant and humane death, using approved euthanasia methods. However, the uninformed reader may believe that the unacceptable conditions at some Mexican plants exist in Canada as well. The media has not made distinctions between the two countries, hence leaving Canadian plants vulnerable to inaccurate perceptions about practices here.

The loss of revenue from the sale and export of horse meat and live horses in Alberta would on average be over \$65 million per year. The loss of the meat horse industry in Alberta would likely result in job losses and a down turn in a local town (Fort MacLeod) economy.

Activists will try to stop the transportation of horses to meat plants, particularly if US horses continue to cross the border and go to Canadian meat plants. Those against horse meat plants will continue to highlight any animal welfare failings of the industry in an attempt to rally public support for a ban on horse for food use in Canada.

⁵⁰ T. Whiting, R. Salmon, G. Wruck, *Chronically starved horses: predicting survival, economic, and ethical considerations*, Can Vet J 2005;46, 320-324.

The ‘horses for food’ issue has yet to escalate in Canada to become a political issue. However, the actions of those who do not adhere to Canada’s guidelines, laws and regulations for the humane care and treatment of horses, put the entire horse industry at risk.

CHAPTER 8 – Issues & Recommended Action

The objective of this report is to provide factual information on the horse as a food producing animal. Opposition to the practice is stated as well. The perspective of this paper is that in Canada, and under Canadian regulations, humanely euthanizing horses for food is acceptable. The risks identified and recommendations put forth relate to the potential for horse meat plants to be banned in Canada as a negative outcome.

Six risk areas have been identified:

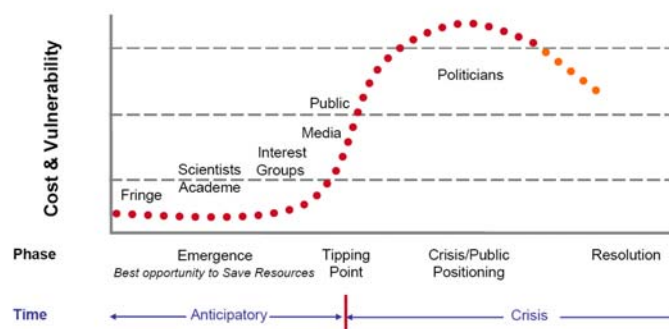
1. The issue is here and now and must be addressed.
2. The emerging view that horses are companion animals.
3. Inadequate attention to and consequences for situations of horse neglect.
4. Drug residues and withdrawal times
5. Consequences of a ban on horse meat plants in Canada – what if it does happen here?

Issue Life Cycle

In the US, the build-up to ban horse meat plants and horses as a food source reached a ‘tipping point’. In other words, the cumulative impact of the activists lobby triggered a situation of low public trust that led to prohibition and bureaucratic control. What was once a situation of having an ability to operate with autonomy/ social trust, ended in a state of control and public outrage.

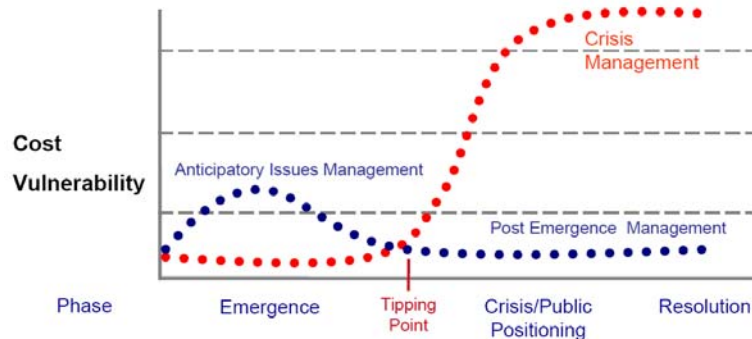
All issues have a life cycle. **Anticipating** the issue before it becomes a crisis **reduces costs and vulnerability**. The horse industry in Canada, the supporting regulatory agencies and politicians have a small window of opportunity to act now with an anticipatory issue management approach versus in a crisis management reactive way.

Issue Life Cycle



Source: Corporate Environmental Strategy, Autumn, 1997, Deborah Anderson, Procter & Gamble

Anticipatory Issues Vs. Crisis



Different Societal Views on Horses for Food

In Canada, horses are generally not considered as food animals. However, horses are humanely euthanized in Canada for human consumption abroad and for small domestic markets. While horses may be humanely euthanized for both human and non-human (i.e., pet food, zoo animals) consumption, **it is the human consumption of horse meat** that has drawn the most criticism mainly by animal activist groups in the US.

In Canada horses are generally categorized as **livestock**. Alberta's Animal Protection Regulations include horses within the definition of livestock.⁵¹ Other provinces define horses similarly, as does the federal Health of Animals Regulations.⁵²

Those who view horses as livestock believe that the option of humanely ending a horse's life at a meat plant is imperative to horse welfare and the horse industry. A horse meat plant is seen as a viable alternative for unwanted or excess horses. Some have noted that millions of unwanted cats and dogs are euthanized each year, but no similar ban is being sought in this instance.

Those supporting the ability to process horses for food believe:

- Many people throughout the world choose to eat horse meat as a healthy protein and should continue to have this option.
- Euthanasia at a meat plant is humane option for ending a horse's life.
- An owner has the right to make this choice.
- The treatment of horses transported to and handled at a federally inspected meat plant is well regulated and we have tools, training and will to ensure humane handling and euthanasia.

⁵¹ Department of Justice Canada, *Health of Animals Regulations*, http://laws.justice.gc.ca/en/showdoc/cr/C.R.C.-c.296/bo-ga:s_2/en (visited Nov. 27, 2007)

⁵² Alberta Queen's Printer, *Alberta Regulation 203/205, Animal Protection Regulation* http://www.qp.gov.ab.ca/documents/Regs/2005_203.cfm?frm_isbn=0779741455 (visited Nov. 27, 2007)

Whether an individual accepts that euthanizing horses and processing the meat for human consumption is considered acceptable, generally revolves around how the individual designates horses or even a particular horse: as ‘livestock’ or as ‘companion animals’.

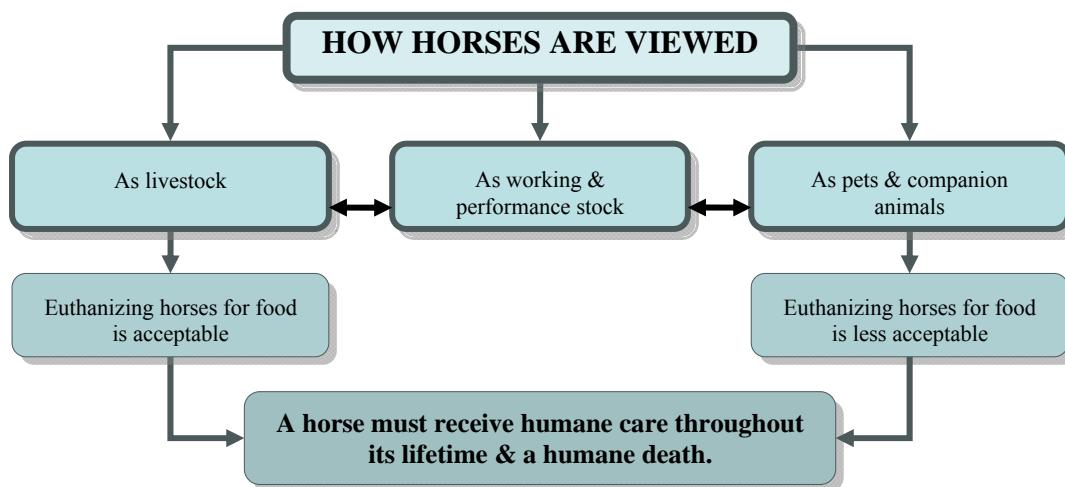
Many people, including some active within the horse industry, see horses as companion animals – and consider it to be repugnant to send ‘companion animals’ to a meat plant to be euthanized for food. **That same person, however, may consider it acceptable to send a bad tempered or cull horse to an auction knowing the end result will be that the horse goes to a meat plant.** Others always categorize horses as livestock, even raise horses for meat purposes.

Acknowledging the different viewpoints is key for future communication efforts.

Temple Grandin notes that it is important to consider the cultural disconnect between people who live in cities and those who live in rural areas. Individuals who formulate opinions about controversial issues, like processing animals for food at meat plants, often lack first hand exposure to the reality of the situation in the field. The more insulated individuals are from field experience, the more extreme their opinions become either for or against an issue.⁵³

The pressure to ban horse meat plants comes from **within the industry itself**. The list of ban supporters in the US includes national horse industry organizations, horse industry leaders, Thoroughbred horse racing owners, jockeys and trainers, and rescue organizations (www.horse-protection.org/about/friends). The challenges are greater when the industry itself is not unified on the issue.

The following chart outlines the diverging views on horses and horses as a food source. Reconciling different views on horses may be impossible. However, the belief that horses deserve humane care and euthanasia is held in common between those for or against the processing of horses for food.



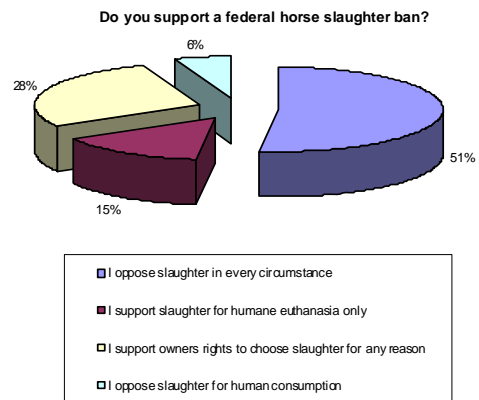
⁵³ Temple Grandin, *A Perspective on Equine Slaughter from the Field*, summary of videoconference presentation, April 19, 2005.

Respondents to a 2003 Alberta horse industry survey suggested that the primary reason they were involved with the horse industry was because ‘I love my horse’ and ‘my horse is my companion’.⁵⁴ The perception of horses as companions or pets contributes to the public concern over horses going to a meat plant to be killed for food.

For some the issue is about the human consumption of animals that some deem as companions. Those who view horses this way see the consumption of horse meat by humans as equally repugnant to the human consumption of cats or dogs. North American society does not accept unwanted cats or dogs being killed for food, regardless of any potential possibility of an overseas market for their meat. This reflects a moral principle that horses are distinguishable from ‘regular’ food animals. They have an elevated status. Moral beliefs tend to be strongly held, and are unlikely to change.

This chart, from the July/07 *The Horse*, a Kentucky publication, illustrates the response of readers to the question; “Do you support a federal horse slaughter ban?” Less than 30% of respondents support the right of owners to choose slaughter for any reason as a disposal option. The range of horse owners/users encompassed within this survey is unknown.

It is notable that 6% of respondents did not oppose slaughter in every circumstance - only for humane euthanasia only.



Recommendation:

1. **Recognize the urgency of the issue and the need to act now.**
2. **Develop a risk communication plan targeted to different segments of the horse industry and the public, including politicians.**
3. **Identify who is going to take the lead on this in Canada. This is not just an Alberta concern. We must be aware of the divide and conquer strategies of activists opposing horses for food. We must ‘control our own destiny’. Key spokespeople must be available to respond and speak positively and consistently for the industry.**
4. **The eyes, ears and voices of the animal activists are focused on the horse industry. Claims of neglect, cruelty and callous handlers and truckers are being made to build an emotional case against legitimate, humane practices. All communication must acknowledge the emotions, not belittle them and provide consistent, calm ‘urban’ sensitive facts.**
5. **Gather testimonials from those who appreciate the service offered by a meat plant and Canadians who eat horse meat.**

⁵⁴ Weststar Inc., Horse Industry Association of Alberta, *Industry Profile and Economic Impact Survey*, 2003.

Horse Welfare

Inhumane treatment of horses destined for processing is a common allegation and argument used against horses being processed for food. Instances of neglect/cruelty caught on film are used to indicate a generalized theme of inhumane treatment for horses destined for meat plants.

Regardless of the designation as companion animal or livestock, the **humane treatment of horses has been identified as an issue. Incidences of owner neglect, which may only be apparent once a horse is presented at a meat plant, have spurred the push to ban horse meat plants. Neglected horses that are accumulated and collectively brought to a processing plant reflect negatively upon the meat processing industry, not upon the owners of the animals.**

Those in support of being able to take horses to a meat plant for a humane death raise the concern that an end to this will lead to increased numbers of neglected and abandoned horses. Ultimately, those responsible and the reasons for neglect need to be identified and addressed.

The common denominator amongst all the players involved in **the humane treatment of horses is the horse owner.** Owner induced neglect is the core welfare issue facing horses regardless of the availability of horse meat plants. Without negligent horse owners there would not be neglected horses bought by dealers or arriving at auctions, feedlots and meat plants. Horse owners choose if their horse will be made available as a food animal, or not (regardless of their cognizance of this choice).

Horse owners have been identified as the primary source of welfare problems associated with horses arriving at meat plants. Temple Grandin noted from an observational study, *“77% of the horses with welfare problems were a direct result of owner neglect prior to shipment for slaughter.”*⁵⁵

However, others along the chain also share in the responsibility. If there is a market for horses, regardless of condition, neglected horses will continue to be sold for cash recovery. All components of the industry (auctions, buyers/dealers, feedlots and meat plants) are responsible for what passes as acceptable. Anyone who accepts an unfit horse, believing a profit can be made, is contributing to the problem. The temptation may be to rationalize that the horse will be better off, but the behaviour of the negligent owner is reinforced by the actions of those further down the chain.

Horse welfare risk areas, associated with horse going to a meat plant exist and need attention.

1. **Horse owners:** Some remain uninformed on horse care and unmotivated to learn in spite of an abundance of horse care information available.
2. **Feedlots:** While there has been few welfare concerns associated with horse feedlots some animals arriving at feedlots may not be sound. This relates back to owner induced welfare issues that are being passed on to feedlots. However, if feedlots are accepting horses with welfare issues (and paying owners for these animals), there is little incentive for horse owners to change their behaviour. Depending upon the condition of the horse, there is a risk that financial gain may take precedence over addressing welfare concerns.

⁵⁵ Temple Grandin, A Perspective on Equine Slaughter from the Field, summary of videoconference remarks, April 29, 2005.

- Best management practices at horse feedlots, including density, shelter and segregation have been challenged by those outside the industry.
3. **Buyers & Dealers:** The risks are the same as with feedlots, and most buyers/dealers operate feedlots. Horses may arrive at the buyer/dealer feedlot in poor condition with the aim of improving the animals' condition, and hence value. However, horses deprived of adequate food and water by their owners, may still deteriorate even when offered quality rations and proper care.
 4. **Adopt-a-Horse Facilities:** These operations have no guidelines and are particularly vulnerable to the costs and lack of expertise needed to deal with severe cases of malnutrition.
 5. **Auctions:** Identified by some as a key entry point for unfit horses.
 6. **Transportation:** The most recognized issue in horse transport is the use of double decker trailers or 'pots.' It is impossible to ship large breed, mature horses in a double decker trailers without contravening the Code of Practice for horses. Concerns have also been raised that loads of US horses, are being transported in unacceptable conditions into Canada, and the rules are being circumvented to avoid inspection.
 7. **Abattoirs:** There have been no concerns raised regarding the humane killing of horses at any of the federally inspected plants in Canada by enforcement officials. However, some horses waiting to be killed may be in poor shape (assuming however, they are fit enough for transport or the shipper, trucker and the receiver are breaking the transportation regulations). It will be these horses that may be used as examples by activists. As well, plants may be providing economic incentive to individuals to deliver unfit animals rather than using on-site euthanasia.
 8. **Enforcement:** The effective enforcement of legislation deters wrongdoing and upholds societal standards. If enforcement of existing animal cruelty laws is seen to be weak then the argument against horse slaughter may be strengthened in the minds of the public.
 9. **Horse industry and breed organizations:** All horse groups must be more aware of the need to improve horse welfare.

A ban on horse meat plants in the US has resulted in **an increased number of horses entering Canada and puts the spotlight on the Canadian industry.** Deviations from acceptable practices are likely to increase the pressure for a similar ban on horse meat plants here. It is in industry's best interests to work with legislators to develop regulations that ensure sound minimum standards are in place and that their enforcement is above reproach.

As well, we have to deal with **guilt by association.** Activist attention has focused on inhumane and unregulated practices in Mexican meat plants. The media has focused its attention on this small segment of the horse meat industry and represented it as reflective of North American standard practices. Media reports on the inhumane treatment of horses in Mexico have, by default, included Canadian plants.

Canadian plants follow strict federal legislation regarding humane handling and humane death. All animals must be rendered insensible prior to bleeding out. However, the uninformed reader may believe that the unacceptable conditions at some Mexican plants exist in Canada as well.

Recommendations:

- **Take action on the recommendations from AFAC's 2004 report, "Horse Welfare in Alberta," particularly:**
 - **Efforts to educate uninformed horse owners**
 - **Clarification of horse welfare standards**
- **Develop a humane handling guideline for horses, including unfit horses. Set an industry standard, a 'line in the sand', that all will be expected to adhere to. The guideline should include a decision-tree that can be distributed or displayed at auction markets and other venues where horses are collected.**
- **Institute third party animal welfare audits, immediately at all federally inspected horsemeat plants, as is done for other meat plants. Due diligence evidence is needed.**
- **Put in place mandatory training for all commercial horse haulers delivery to Canadian horsemeat plants. Due diligence evidence is needed.**
- **Have Best Management Practice (BMP) documents and due diligence evidence in place for all feedlots.**
- **Immediately do benchmark research on humane handling practices, identifying negative horse welfare incidents; on farm, in transit, arrivals at plants and other critical control points.**
- **Support a ban on transporting horses in double-decker trailers, as proposed by the Canadian Food Inspection Agency (CFIA) for changes to the Health of Animals Regulations. Push for laws to reflect the Code regarding time in transit.**
- **Develop training courses (or promote existing courses) for the humane handling of horses at auctions, during transport and at slaughter facilities.**
- **Call for enhanced surveillance by CFIA to ensure that horses are transported in accordance with Canada's humane transportation regulations.**
- **Call for interagency sharing of information (RCMP-SPCA-CFIA-LIS). Agencies need to discuss horse welfare issues and develop a consistent approach for addressing them.**
- **Document the rigorous Canadian humane laws, the positive attitude of the industry players and inter agency action.**

Drug Residues and Withdrawal Times

The European Union (EU) and CFIA have no standards or requirements in place for drug withdrawal times in horses used as food animals. CFIA staff performs random drug tests, following food safety protocols at all federally inspected meat plants. However, if a drug residue or traceability issue is found to exist in horses the integrity of the Canadian food safety system in general may be challenged.

There are also export market risks if horses are entering Canada for declared purposes other than immediate slaughter but in fact are going to meat plants.

Recommendations:

- **Ensure veterinarians are advising clients with horses of any drug withdrawal periods or if a drug's use makes a horse ineligible for slaughter.**
- **Have the Veterinary Drug Directorate look into this.**

Consequences of a Ban in Canada

The closure of US horse meat plants has resulted in horses being transported further distances and into Canada and Mexico.

A Canadian ban on horse meat plants would likely exacerbate the potential impacts identified in the US Animal Welfare Council report and:

- Even more horses may go to Mexico where animal welfare laws are lacking.
- A drop in the economic value of horses would likely aggravate owner neglect issues already identified.⁵⁶ Economic constraints are often identified as the primary reason surrounding neglect.
- The dispatch and disposal of unwanted horses also has an associated cost. There is a risk that neglectful owners who are unwilling to bear the resulting expense may not humanely euthanize their horse in a timely manner.
- Enforcement agencies would be ill equipped to address the anticipated increase in welfare complaints. Efforts would be required to ensure horses are properly euthanized with appropriate carcass disposal.
- There is no national plan in Canada or the United States to manage excess numbers of horses or to provide rescue agencies with financial support. The cost of maintaining unwanted horses in Canada is unknown, but an Alberta survey of horse owners suggests that one horse can cost \$3,522 annually to maintain.
- The loss of revenue from the sale and export of horse meat and live horses in Alberta would on average be over \$65 million per year. The loss of the horse meat plant in Alberta would likely result in job losses and a down turn in the local Fort MacLeod economy.
- What do we do with unwanted or excess horses in general? Many are normal, healthy animals. Who is responsible for these animals if a horse meat plants are closed?
- **All horses destined for meat plants are not unwanted by their previous owner. There is a segment of the horse industry that breeds and raises horses solely for human food consumption.** It is estimated that 1/3 of the horses processed in Alberta are purpose raised for meat. These animals are wanted, but their purpose is solely as a food animal – no different than cattle, sheep, pigs or chickens that are raised for their meat. This segment of the horse industry has generally not been a focus of the activists.
- The choice to consume horse meat or any other food is a democratic choice in a democratic country.

⁵⁶ 'Chronically starved horses: predicting survival, economic and ethical considerations,' T. Whiting, R. Salmon, and G. Wruck, Can Vet J 2005: 46:230-324.