

EXHIBIT 1

BANNED AND DANGEROUS SUBSTANCES COMMONLY GIVEN TO HORSES SENT TO SLAUGHTER

	Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
1.	Acepromazine	Anti-anxiety/tranquilizer Previously used in humans, but use discontinued	See also Citak A, Soysal DD, Uçsel R, Karaböçüoğlu M, Uzel N., <i>Seizures associated with poisoning in children: tricyclic antidepressant intoxication</i> , PEDIATR INT. 48(6):582-585 (2006) (Two children suffered cardiac arrest from intoxication from acepromazine and died.).
2.	Acetazolamide	Diuretic for horses. Used to treat epilepsy and benign intracranial hypertension in children and adults.	Acetazolamide (sulfonamide) induces metabolic alkalosis and is contraindicated in patients with hyperchloremic acidosis, angle-closure glaucoma, kidney and liver disease, and in patients with Addison's disease. Fatalities have occurred (rare) due to Stevens-Johnson syndrome (diffuse rash that sloughs), toxic epidermal necrolysis, fulminant hepatic necrosis, agranulocytosis, aplastic anemia, and other blood dyscrasias. Sensitizations may recur when a sulfonamide is readministered irrespective of the route of administration. If signs of hypersensitivity or other serious reactions occur, discontinue use of this drug. Caution is advised for patients receiving concomitant high-dose aspirin and Acetazolamide, as anorexia, tachypnea, lethargy, coma and death have been reported. http://www.drugs.com/pro/acetazolamide.html
3.	Acriflavine	Blue-Kote (topical ointment, antiseptic, protective wound dressing) http://www.drugs.com/vet/dr-naylor-blue-kote.html Not for use on animals intended for food. http://www.horsesuppliesplus.com/antiseptics.html	Acriflavine is an ingredient found in Blue-Kote, which is itself labeled "not for use on animals intended for food." The dangers for humans who ingest this substance are unknown.
4.	Altrenogest	Regu-Mate (altrenogest/oral progestin) (growth promoter) 21 CFR § 520.48: - "Do not use in horses intended for human consumption." "Do Not Use In Horses Intended For Human Consumption." http://www.drugs.com/vet/regu-mate-solution.html	<u>Active harmful ingredients (residue):</u> <u>Progestin</u> . Progestin is used in the mini-pill to prevent contraception so progestin could result in an aborted fetus in a pregnant woman. Progestin along with estrogens are pro-thrombotic meaning that they cause deep blood clots, including venous thrombosis and cerebral thrombosis. http://www.nejm.org/doi/full/10.1056/NEJM200105173442007 Combined with estrogens, progestin increases the risk of breast cancer and cardiovascular problems.

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			http://www.whi.org/findings/ht/eplusp_3yr.php Increased stroke risk. http://www.whi.org/findings/ht/ealone_stroke.php HUMAN WARNINGS Skin contact must be avoided as Regu-mate® (altrenogest) Solution 0.22% is readily absorbed through unbroken skin. Protective gloves must be worn by all persons handling this product. Pregnant women or women who suspect they are pregnant should not handle Regu-mate® (altrenogest) Solution 0.22%. Women of child bearing age should exercise extreme caution when handling this product. Accidental absorption could lead to a disruption of the menstrual cycle or prolongation of pregnancy. Direct contact with the skin should therefore be avoided. Accidental spillage on the skin should be washed off immediately with soap and water. http://www.drugs.com/vet/regu-mate-solution.html
5.	Aluminum hydroxide	Strepvax II (component in equine vaccine) Used in humans for gastrointestinal problems, ulcers. http://www.drugs.com/vet/strepvax-ii.html	WARNINGS/PRECAUTIONS May cause constipation. Caution with renal failure; prolonged use may result in or worsen dialysis osteomalacia. Elevated tissue aluminum levels contribute to the development of dialysis encephalopathy and osteomalacia syndromes. Caution with normophosphatemic patients; prolonged use may result in hypophosphatemia if phosphate intake is inadequate. ADVERSE REACTIONS Constipation, dialysis osteomalacia, hypophosphatemia. http://www.pdr.net/drugpages/concise/monograph.aspx?concise=1544 Can cause constipation, confusion, loss of appetite, and muscle weakness. http://www.ncbi.nlm.nih.gov/pubmedhealth/PMH0001056/
6.	Amikacin	Antibiotic 21 CFR § 529.56 - “Do not use in horses intended for human consumption”	Antibiotics are potentially dangerous to humans who either have allergies or sensitivities to them. Additionally, the use of antibiotics in food animals, and the subsequent ingestion by humans of those animals, has the potential to create antibiotic resistance in humans, which can cause significant problems for humans upon subsequent illness.
7.	Amoxicillin	Antibiotic	Infections and Infestations: Mucocutaneous candidiasis. Gastrointestinal: Nausea, vomiting, diarrhea, black hairy tongue, and hemorrhagic/pseudomembranous colitis. Onset of pseudomembranous colitis symptoms may occur during or after antibiotic treatment. Hypersensitivity Reactions: Anaphylaxis Serum sickness-like reactions, erythematous maculopapular rashes, erythema multiforme, Stevens-Johnson syndrome, exfoliative dermatitis, toxic epidermal necrolysis, acute generalized exanthematous pustulosis, hypersensitivity vasculitis and urticaria have been reported. Liver: A moderate rise in AST (SGOT) and/or ALT (SGPT) has been noted, but the significance of this finding is unknown. Hepatic dysfunction including cholestatic

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			jaundice, hepatic cholestasis and acute cytolytic hepatitis have been reported. <u>Hemic and Lymphatic Systems</u>: Anemia, including hemolytic anemia, thrombocytopenia, thrombocytopenic purpura, eosinophilia, leukopenia, and agranulocytosis have been reported during therapy with penicillins. These reactions are usually reversible on discontinuation of therapy and are believed to be hypersensitivity phenomena. <u>Central Nervous System</u>: Reversible hyperactivity, agitation, anxiety, insomnia, confusion, convulsions, behavioral changes, and/or dizziness have been reported rarely. Miscellaneous: Tooth discoloration (brown, yellow, or gray staining) has been rarely reported. Most reports occurred in pediatric patients. Discoloration was reduced or eliminated with brushing or dental cleaning in most cases. http://www.drugs.com/sfx/amoxicillin-side-effects.html
8.	Ampicillin sodium	Antibiotic for treatment of respiratory tract infections (pneumonia and strangles) and skin and soft tissue infections (abscesses and wounds), when caused by susceptible organisms. 21 CFR § 522.90c - "Do not use in horses intended for human consumption."	COMMON SIDE EFFECTS Inflammation and redness of the tongue; irritation of mouth or throat; mild diarrhea; nausea; second infection; vomiting. SEVERE SIDE EFFECTS Severe allergic reactions (rash; hives; itching; difficulty breathing; tightness in the chest; swelling of the mouth, face, lips, or tongue); bloody stools; severe diarrhea; stomach pain/cramps; vaginal irritation or discharge. http://www.drugs.com/sfx/ampicillin-side-effects.html See also side effects for ampicillin injection: •upset stomach, diarrhea, vomiting, mild skin rash More severe: •severe skin rash, itching, hives, difficulty breathing or swallowing, wheezing, unusual bleeding or bruising, headache, dizziness, seizures, sore mouth or throat http://www.nlm.nih.gov/medlineplus/druginfo/meds/a601133.html Material Safety Data Sheet ("MSDS") for ampicillin sodium salt: Toxic Effects on Humans: Hazardous in case of ingestion, of inhalation. http://www.sciencelab.com/msds.php?msdsId=9925610
9.	Aspirin	Aspirin-paste http://www.dr.fostersmith.com/1/1/10913-aspirin-paste-by-oral-x.html Reduces joint, muscle, and lameness pain.	WARNINGS/PRECAUTIONS Avoid in children or teenagers for chickenpox or flu symptoms; Reye's syndrome may occur. May cause severe allergic reaction (hives, facial swelling, asthma, shock) and stomach bleeding. Avoid in asthma, stomach problems that persist or recur, ulcers, or bleeding problems. ADVERSE REACTIONS Allergic reaction, hives, facial swelling, asthma, shock. http://www.pdr.net/drugpages/concisemonograph.aspx?concise=195

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			Can cause excessive bleeding in those taking warfarin; http://stroke.ahajournals.org/content/40/5/1944.full Severe allergic reactions (rash; hives; itching; difficulty breathing; tightness in the chest; swelling of the mouth, face, lips, or tongue); black or bloody stools; confusion; diarrhea; dizziness; drowsiness; hearing loss; ringing in the ears; severe or persistent stomach pain; unusual bruising; vomiting. http://www.drugs.com/sfx/aspirin-side-effects.html
10.	Avermectin A1a, 5-O-demethyl-25-de(1-methylpropyl)-22,23-dihydro-25-(1-methylethyl)-	Farnam Ivercare (dewormer) http://msds.farnam.com/m001116.htm Ivercare Paste is labeled “Do not use in horses intended for food purposes.” http://www.drugs.com/vet/ivercare-paste-1-87.html	A hazardous component of the Farnam Ivercare dewormer product. http://msds.farnam.com/m001116.htm Links to the toxicological literature here: http://pubchem.ncbi.nlm.nih.gov/summary/summary.cgi?sid=14145#x50 http://toxnet.nlm.nih.gov/cgi-bin/sis/search/r?dbs+toxline:@term+@m+65195-51-9+@OR+@all
11.	Benzyl alcohol	Equipoise Equipoise Injectable http://www.drugs.com/vet/equipoise-injectable-can.html	ADVERSE REACTIONS Pruritis, erythema, pyoderma, ocular irritation. http://www.pdr.net/search/searchResult.aspx?searchCriteria=Benzyl+alcohol
12.	Boldenone undecylenate	Equipoise injectable 21 CFR § 522.204 - “Do not administer to horses intended for human consumption.” Equipoise injectable (boldenone undecylenate injection) is recommended as an aid for treating debilitated horses when an improvement in weight, haircoat or general physical condition is desired. http://www.drugs.com/vet/equipoise-injectable-can.html	Boldenone undecylenate is a steroid ingredient in Equipose (for horses). It is not indicated for use in humans but appears to have off-label uses as a bodybuilding steroid. Known side effects consist of: nausea, leukopenia, symptoms resembling a peptic ulcer, acne, excitation (commonly referred to as roid rage), sleeplessness, chills, vomiting, diarrhea, hypertension, prolonged blood clotting time, increase in libido. Females had reported menstrual irregularities, post-menopausal bleeding, increased sex drive, swelling of the breasts, hoarseness or deepening of the voice, and enlargement of the clitoris. Men had reported acne, gynecomastia, and increased aggression. http://www.anabolicsmall.com/equipoise.html Steroids should be taken under a doctor’s supervision and have multiple significant adverse affects including severe allergic reactions, hormonal changes, changes in menstrual functions, mental and mood changes, respiratory problems, nausea and vomiting, joint swelling, vision changes, and unusual weight gain.
13.	Butorphanol	For the relief of pain associated with colic and postpartum pain in adult horses and yearlings.	COMMON SIDE EFFECTS Dizziness; drowsiness; dry mouth; light-headedness; nasal irritation; nausea; runny nose; sore throat; stuffy nose; trouble sleeping; unpleasant taste; vomiting.

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		21 CFR § 522.246 - “Do not use in horses intended for human consumption.”	SEVERE SIDE EFFECTS Severe allergic reactions (rash; hives; itching; difficulty breathing; tightness in the chest; swelling of the mouth, face, lips, or tongue); blurred vision; burning, numbness, or tingling; change in the amount of urine produced; chest pain; confusion; ear pain; fainting; fast, slow, or irregular heartbeat; flushing; hallucinations; mental or mood changes (agitation, anxiety, depression); restlessness; ringing in the ears; seizures; severe or persistent dizziness, drowsiness, or light-headedness; severe or persistent headache or trouble sleeping; shortness of breath; slow, shallow, or difficult breathing; tremors; unusual swelling. http://www.drugs.com/sfx/butorphanol-side-effects.html
14.	Butoxy Polypropylene Glycol	Farnam Bronco Gold (fly spray) http://msds.farnam.com/m001650.htm Farnam Endure Fly Spray http://msds.farnam.com/m000080.htm Farnam Endure Sweat-Resistant http://msds.farnam.com/m001046.htm Farnam Tri-Tec 14 http://msds.farnam.com/m000490.htm Farnam Wipe (fly control)	In 2002, a woman in Oklahoma was hospitalized after using Pyranha fly spray on horses. Her face was distorted, and her words slurred. She reportedly had leg problems, tremors, memory problems. The medical toxicologist's conclusion was that the patient, a professional horse trainer, developed a complex neurotoxic movement disorder following sensitization to a product that contained 33% /butoxypolypropylene glycol/ BPG. Adverse reactions and side effects of ingestion are unknown.
15.	Carbadox	Antibiotic used for growth promotion purposes (generic)	Not permitted for use in food-producing animals in Australia (http://www.apvma.gov.au/registration/not_permitted.php) Or in Canada, or the European Union. (http://www.hc-sc.gc.ca/dhp-mps/vet/faq/faq_mrl-lmr-eng.php#a6) Not for human use. http://www.drugs.com/pro/mecadox.html Chronic health effects, including cancer, mutagenic effect, changes in lung function. Accidental ingestion may cause serious harm or be fatal. MSDS SUPPLIER http://datasheets.scbt.com/sc-204668.pdf
16.	Ceftiofur Crystalline Free Acid	Excede (antibiotic) For the treatment of lower respiratory tract infections in horses. 21 CFR § 522.313a	Intended for use in horses which are non-food animals. Because this indication for this new animal drug is not intended for use in food producing animals, there is no data pertaining to drug residues in food (i.e., human food safety). WARNINGS

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		- “Do not use in horses intended for human consumption.” http://www.excede.com/Excede.aspx?country=US&drug=XT&sec=100&species=EQ	Not for use in humans. For use in animals only. Consult a physician in case of accidental human exposure. Do not use in horses intended for human consumption. http://animalhealth.pfizer.com/sites/pahweb/US/EN/Products/Documents/Combined%20Full%20PI%20(8_5x11)%20-%20EXEQ0110014.pdf
17.	Ceftiofur Sodium	Ceftiflex powder For treatment of respiratory infections in horses. 21 CFR § 522.313c - “Do not use in horses intended for human consumption.” http://www.drugs.com/vet/ceftiflex.html	Penicillins and cephalosporins can cause allergic reactions in sensitized individuals. Topical exposure to such antimicrobials, including ceftiofur, may elicit mild to severe allergic reactions in some individuals. Repeated or prolonged exposure may lead to sensitization. Avoid direct contact of the product with the skin, eyes, mouth, and clothing. http://www.drugs.com/vet/ceftiflex.html
18.	Chloramphenicol	Chlor-500 Chlor-1000 Chloramphenicol 1% Ointment “Not for use in animals that are raised for food production. Must not be used in meat, egg, or milk-producing animals. 21 CFR § 520.390a; 520.390c; 522.390; 524.390. http://www.drugs.com/vet/chlor-500-can.html http://www.drugs.com/vet/chlor-1000-can.html http://www.drugs.com/cdi/chloramphenicol.html http://www.drugs.com/vet/chloramphenicol-l-ophthalmic-ointment-can.html	Some medicines may interact with Chloramphenicol: •Anticoagulants (e.g., warfarin) because side effects, including risk of bleeding, may be increased. •Hydantoins (e.g., phenytoin) or sulfonyleureas (e.g., glyburide) because the actions and side effects of these medicines may be increased. •Medicines that may decrease your bone marrow (e.g., cancer chemotherapy) because the risk of serious side effects, such as low blood platelet levels and low white blood cell counts, may be increased. Chloramphenicol has caused severe and sometimes fatal blood problems (e.g., anemia, low blood platelets, low white blood cell counts). Leukemia has also been reported after use of Chloramphenicol. Blood problems have occurred after both short-term and long-term use of Chloramphenicol. Do not use chloramphenicol if safer, effective medicines can be used. http://www.drugs.com/cdi/chloramphenicol.html Prohibited for use in food-producing animals in the European Union.
19.	Chloroform	Anesthetic	The IARC (International Agency for Research on Cancer) classifies chloroform as possibly carcinogenic to humans. http://monographs.iarc.fr/ENG/Monographs/vol73/mono73.pdf
20.	Cimetidine	Prevention and prophylaxis of	ADVERSE REACTIONS

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		gastrointestinal irritation and ulcers	Diarrhea, headache, dizziness, somnolence, reversible confusional states, reversible impotence, increased serum transaminases, rash, gynecomastia, blood dyscrasias. WARNINGS/PRECAUTIONS Reversible confusional states reported, especially in severely ill patients. Increased risk of developing confusional states with advancing age (≥50 yrs), renal and/or hepatic impairment. Risk of hyperinfection of strongly/oidiasis in immunocompromised patients. http://www.pdr.net/drugpages/concise/monograph.aspx?concise=1440
21.	Clenbuterol	Beta-agonists used for growth promotion purposes Prohibited from any use in any food-producing animal. http://www.farad.org/eldu/prohibit.asp	Not approved for human use. http://www.deadiversion.usdoj.gov/drugs_concern/clenbuterol.htm
22.	Copper Naphthenate	Kopertox Treatment of thrush. 21 CFR § 524.463 - “Do not use in horses intended for human consumption.” http://www.drugs.com/vet/kopertox.html http://www.sciencelab.com/msds.php?msdsId=9923553	Toxic to central nervous system, blood, and kidneys. May produce vomiting, headache, shock, jaundice, kidney damage, nervous system damage, liver damage.
23.	Crude Liver Extract	Liver 7 injection http://www.drugs.com/vet/liver-7-injection.html	FDA cautions against the use by humans of any animal organ extract. http://www.healthline.com/natstandardcontent/liver-extract
24.	Cupric Sulfate	Proudsoff (ointment for control and removal of proud flesh) Not for use on animals intended for food. http://www.drugs.com/vet/proudsoff.html	Harmful if swallowed. May cause gastrointestinal tract irritation with nausea, vomiting, diarrhea, metallic taste, burning sensation in the stomach or epigastrium, abdominal pain, and possible gastrointestinal tract bleeding. May affect metabolism, liver (liver damage, jaundice), blood, urinary system (kidney damage, hematuria, hemoglobinuria, albuminuria), behavior/nervous systems (somnolence, tremor, psychosis, muscle weakness, coma), cardiovascular system (lowering of blood pressure, dysrhythmia).
25.	Cypermethrin	Farnam Endure Sweat-Resistant (fly spray) http://msds.farnam.com/m0000080.htm	“Pyrethroid ingestion gives rise within minutes to a sore throat, nausea, vomiting and abdominal pain. There may be mouth ulceration, increased secretions and/or dysphagia. Systemic effects occur 4-48 hours after exposure. Dizziness, headache and fatigue are common, and palpitations, chest tightness and blurred vision less

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		m	frequent. Coma and convulsions are the principal life-threatening features. Most patients recover within 6 days. . .” S.M. Bradberry <i>et al.</i>, <i>Poisoning Due to Pyrethroids</i>, Toxicol Rev. 24(2):93-106 (2005) (quoting abstract). Potential organ damage. http://pmep.cce.cornell.edu/profiles/extoxnet/carbaryl-dicrotophos/cypermet-ext.html
26.	Dapsone	Dermatitis skin problems in horses. Acne treatment in humans.	Adverse effects include agranulocytosis, aplastic anemia, leucopenia, thrombocytopenia, hemolysis, and other blood dyscrasias have been reported after treatment. It may cause significant reduction in leukocytes, platelets, or hemopoiesis. Caution with glucose-6-phosphate dehydrogenase (G6PD) deficiency, methemoglobin reductase deficiency, or hemoglobin M, and those who are exposed to other agents or conditions such as infection or diabetic ketosis capable of producing hemolysis. Toxic hepatitis and cholestatic jaundice reported after use. Liver function tests must be monitored if there are any abnormalities. Can cause muscle weakness. Peripheral neuropathy, nausea and vomiting, abdominal pain, and pancreatitis may occur. http://www.pdr.net/search/searchResult.aspx?searchCriteria=Dapsone
27.	Deodorized Kerosene	Component in Farnam Repel Xp (fly spray). http://msds.farnam.com/m000031.htm	Ingestion may cause aspiration hazard, nausea, fatigue, pulmonary edema, central nervous system depression, convulsions and loss of consciousness. http://www.sciencestuff.com/msds/CI1955.html
28.	Deslorelin	Used for inducing ovulation within 48 hours in ovulating mares. 21 CFR § 522.533 - “Do not use in horses intended for human consumption.”	Deslorelin stops the production of certain sex hormones in horses, and has never been approved for use on humans. If it was approved, it would be for a small targeted complement of the human population with identified diseases related to the production of too much of certain sex hormones, but could otherwise produce unwanted hormonal effects and responses.
29.	Detomidine Hydrochloride	Dormosedan Pain relief and sedative for minor surgery. Also used in humans for sedation in intensive care and surgery conditions. 21 CFR § 522.536; 529.536 - Not for use in horses intended for food.” - “Do not use in horses intended for human consumption.” http://www.dormosedan.com/	Can cause hypotension, hypertension, bradycardia, dry mouth, respiratory depression, tachycardia, nausea and vomiting, atrial fibrillation, fever, hyperglycemia, anemia, hypovolemia, hypoxia, atelectasis. http://www.pdr.net/drugpages/concise/monograph.aspx?concise=2848

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30.	Dexamethasone	Dexium injection Anti-inflammatory drug. 21 CFR § 522.540 - (d)(4) (sterile aqueous solution). “Not for use in horses intended for food.” - (e)(5) (sterile aqueous solution). “Not for use in horses intended for food.” 21 CFR § 522.542 - “Not for use in horses intended for food.” http://www.drugs.com/vet/dexium-injection.html Steroid for humans.	Adverse reactions include fluid/electrolyte disturbances, muscle weakness, osteoporosis, peptic ulcer, pancreatitis, ulcerative esophagitis, impaired wound healing, headache, psychic disturbances, growth suppression (pediatrics), glaucoma, hyperglycemia, weight gain, nausea, malaise. http://www.pdr.net/drugpages/concise/monograph.aspx?concise=798 Steroids should be taken under a doctor's supervision and have multiple significant adverse effects including severe allergic reactions, hormonal changes, changes in menstrual functions, mental and mood changes, respiratory problems, nausea and vomiting, joint swelling, vision changes, and unusual weight gain.
31.	Dichloromethane	Furall Antibacterial http://msds.farnam.com/m000394.htm	If eaten, this drug can cause gastrointestinal irritation with nausea, vomiting and diarrhea. May cause kidney damage. May cause central nervous system depression, characterized by excitement, followed by headache, dizziness, drowsiness, and nausea. Advanced stages may cause collapse, unconsciousness, coma and possible death due to respiratory failure. May cause carboxyhemoglobinemia. Dichloromethane has been treated as a carcinogen in California since 1988 and it may also have adverse reproductive effects. http://www.sciencelab.com/msds.php?msdsId=9948&code=SLM2677
32.	Diclazuril	Clinacox Antiprotozoal Used to treat infections leading to myoencephalitis. 21 CFR § 520.606 - “Do not use in horses intended for human consumption.”	Administered to some AIDS patients, but effects in humans largely unknown.
33.	Diclofenac Sodium	Surpass (topical) Arthritis treatment in humans and horses. 21 CFR § 524.590 - “Do not use for horses intended for human consumption.” http://www.drugs.com/vet/surpass-	May cause hypertension, edema, or heart failure. Some individuals with prior gastrointestinal disease may be hypersensitive to the drug's effects. Potential kidney failure and danger for patients with renal disease. May cause anaphylactic reactions; may harm fetus in utero. May cause liver problems. May cause anemia and affect blood. May cause abdominal pain, constipation, diarrhea, dyspepsia, flatulence, gross bleeding/perforation, heartburn, nausea and vomiting, gastrointestinal ulcers, renal function abnormalities, anemia, dizziness, edema, elevated liver enzymes. http://www.pdr.net/search/searchResult.aspx?searchCriteria=Diclofenac+Sodium

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		topical-cream.html	
34.	Diflubenzuron	Equitrol II Fly control http://www.drugs.com/vet/equitrol-ii-feed-thru-fly-control.html	May cause anemia.
35.	Dimethylsulfoxide	Topical application for sprains, soreness; may also be injected or combined with other drugs for administration. Limited treatment use in humans -- used as a topical application to reduce acute swelling due to trauma. 21 CFR § 524.660a - Dimethyl sulfoxide solution - “Not for use in horses and dogs intended for breeding purposes nor in horses slaughtered for food.” 21 CFR § 524.660b - Dimethyl sulfoxide gel - “Do not use in horses and dogs intended for breeding purposes or in horses slaughtered for food.” http://www.webmd.com/vitamins-supplements/ingredientmono-874-DMSO%20(DIMETHYLSULFOXIDE).aspx?activeIngredientId=874&activeIngredientName=DMSO%20(DIMETHYLSULFOXIDE) MSDS available here: http://www.sciencelab.com/msds.php?msdsId=9927347	May cause headache, dizziness, drowsiness, nausea, vomiting, diarrhea, constipation, breathing problems, vision problems, blood problems, and allergic reactions. Also may harm the liver and kidneys. http://www.webmd.com/vitamins-supplements/ingredientmono-874-DMSO%20(DIMETHYLSULFOXIDE).aspx?activeIngredientId=874&activeIngredientName=DMSO%20(DIMETHYLSULFOXIDE) MSDS available here: http://www.sciencelab.com/msds.php?msdsId=9927347
36.	Dimetridazole (generic)	Bactericidal Antibacterial	Withdrawn from European market because of dangers of gastrointestinal problems, potential for cancer. http://www.bioagrimix.com/msds/36/36280/3628007.pdf
37.	Di-n-propyl isocinchomeronate	Fly control products:	High toxicity – classified as a carcinogenic Pesticide Action Network (PAN) “Bad Actor”. ¹

¹ “PAN Bad Actor pesticides” belong to a “most toxic” set of pesticides identified by the Pesticide Action Network and Californians for Pesticide Reform (CPR). These pesticides are at least one of the following: known or probable carcinogens, as designated by the International Agency for Research on Cancer (IARC), U.S. EPA, U.S. National Toxicology Program, and the state of California’s Proposition 65 list; reproductive or developmental toxicants, as designated by the state of

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		Flysect Super-7 repellent spray Flysect Super-C Mosquito Halt http://www.drugs.com/vet/flysect-super-7.html http://msds.farnam.com/m000811.htm http://www.drugs.com/vet/flysect-super-c.html http://www.drugs.com/vet/mosquito-halt-repellent-spray-for-horses.html	www.pesticideinfo.org/Detail_Chemical.jsp?Rec_id=PC2798
38.	Dipropyl isocinchomeronate	Farnam Roll-On Repellent (fly spray) http://msds.farnam.com/m000018.htm	High toxicity – PAN Bad Actor. Carcinogenic. www.pesticideinfo.org/Detail_Chemical.jsp?Rec_id=PC2798
39.	Domperidone	In horses, used for treatment of toxicity from fescue grass that affects pregnancies. In humans, used to increase bowel contractions and combat nausea and vomiting caused by other drugs. 21 CFR § 520.766 - “Do not use in horses intended for human consumption.” http://www.fda.gov/AnimalVeterinary/SafetyHealth/ProductSafetyInformation/ucm235691.htm	FDA has warned that this drug passes into breast milk and should not be used in nursing human mothers. Side effects include dizziness, dry mouth, nervousness, flushing, irritability, insomnia, stomach cramps, hot flashes and leg cramps, chest pain, slow/fast/irregular heartbeat, swelling of the feet or ankles, difficulty urinating, swelling of the breasts or discharge from the nipple in men or women, menstrual changes, sexual difficulties. May affect absorption and action of other drugs, and interact with other drugs. http://www.medicinenet.com/domperidone-oral/article.htm
40.	Doxycycline	Antibiotic for horses and humans. http://www.drugs.com/cdi/doxycycline-capsules.html	Dangerous for pregnant women; may cause tooth problems, gastrointestinal symptoms, autoimmune syndrome, renal problems.

California’s Proposition 65 list; neurotoxic cholinesterase inhibitors, as designated by California Department of Pesticide Regulation, the Materials Safety Data Sheet for the particular chemical, or PAN staff evaluation of chemical structure (for organophosphorus compounds); known groundwater contaminants, as designated by the state of California (for actively registered pesticides) or from historic groundwater monitoring records (for banned pesticides); pesticides with high acute toxicity, as designated by the World Health Organization (WHO), the U.S. EPA, or the U.S. National Toxicology Program.

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41.	Doxylamine succinate	Antihistamine Anticholinergic 21 CFR 520.784 - “Not for use in horses intended for food.”	Not to be combined with other antihistamines. Can cause multiple adverse side effects.
42.	Equine Influenza vaccine	Killed virus vaccine	Not intended for human use and no testing on human ingestion of this vaccine.
43.	Equine Rhinopneumonitis – Influenza vaccine	Killed virus vaccine Prestige II with Havlogen (vaccine) http://intervetusa.com/product_view&id=1047348	Not intended for human use and no testing on human ingestion of this vaccine.
44.	Estradiol	Female hormone for management of reproductive functions in horses, and for relief of menopausal symptoms in humans Estradiol Cypionate in Oil Estradiol enanthate; Estradiol benzoate	Risk of cancer is among the multiple potential negative side effects related to the unapproved and uncontrolled use of this synthetic female hormone. Other side effects include headaches, dizziness, breast pain, increased risk for yeast infections, flu-like symptoms, arthritic pain, hair loss, gastrointestinal problems including nausea or vomiting, and incidences of spotting in between periods or other menstrual irregularities. May be unsafe for people with blood disorders, heart disease, obesity, seizure disorders or certain allergies.
45.	Eucalyptus Oil	Scarlet Oil Wound Dressing http://www.drugs.com/vet/scarlet-oil.html Labeled “Not for use on animals intended for food.”	Potential side effects include seizures, poisoning, drowsiness, morbidity in children, central nervous system, depression.
46.	Fenbendazole	Dewormer (Panacur) Equi-bits Panacur Paste Panacur Power Pac Panacur Suspension Safe-Guard Safe-Guard Power-Dose 21 CFR § 520.905a - “Do not use in horses intended	No human formulation, and adverse effects on humans who eat this dewormer, that directly affects the gastrointestinal tract, are unknown.

	Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
		for human consumption.”	
47.	Firocoxib	Equioxx Non-steroidal anti-inflammatory drug (NSAID). 21 CFR § 520.930; 522.930 - Firocoxib paste. - “Do not use in horses intended for human consumption.” http://www.equioxx.com/	There is no approved use of this drug for humans and so any adverse effects on humans who ingest this drug are completely unknown. Firocoxib is one of the NSAIDs, all of which have extensive potential adverse side effects in humans including cardiovascular, gastrointestinal, kidney and eye problems. The NSAIDs can be dangerous for individuals with blood disorders. They are also contraindicated during pregnancy. They also present significant risk for people with a history of ulcers or gastrointestinal bleeding. Can cause nausea, abdominal pain, diarrhea, headaches, excitability, and nervous system problems.
48.	Flunixin	<u>NSAID:</u> Banamine (solution or paste) (pain killer) Flunazine injectable Flu-nix D injection Flunixamine 21 CFR § 520.970 - Granules - “Do not use in horses intended for human consumption.” 21 CFR § 522.970 - Injectable - “Do not use in horses intended for human consumption.”	Flunixin is one of the NSAIDs, all of which have extensive potential adverse side effects in humans including cardiovascular, gastrointestinal, kidney and eye problems. The NSAIDs can be dangerous for individuals with blood disorders. They are also contraindicated during pregnancy. They also present significant risk for people with a history of ulcers or gastrointestinal bleeding. Can cause nausea, abdominal pain, diarrhea, headaches, excitability, and nervous system problems.
49.	Flunixin Meglumine	<u>NSAID:</u> Flunazine injectable Flu-nix D injection Flunixamine Labeled: Not for use in horses intended for food. http://www.drugs.com/vet/flunixin-meglumine-injection.html http://www.drugs.com/vet/flunazine-injectable-solution.html http://www.drugs.com/vet/flu-nix-d-	This is also one of the NSAIDs, all of which have extensive potential adverse side effects in humans including cardiovascular, gastrointestinal, kidney and eye problems. The NSAIDs can be dangerous for individuals with blood disorders. They are also contraindicated during pregnancy. They also present significant risk for people with a history of ulcers or gastrointestinal bleeding. Can cause nausea, abdominal pain, diarrhea, headaches, excitability, and nervous system problems.

	Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
		ivx.html http://www.drugs.com/vet/flunixinamini.html	
50.	Furaltadone	<u>Antibacterial</u> http://www.chemblink.com/MSDS/MSDSFiles/139-91-3_Sigma-Aldrich.pdf	May cause cancer in humans, but very little known about effect on humans because the drug has not been tested on humans and the potential side effects upon ingestion are unknown.
51.	Furazolidone	<u>Antibacterial:</u> Furall Furox Aerosol Powder Used in humans as an anti-diarrheal 21 CFR § 524.1005 - “Not for use in horses intended for food.” http://msds.farnam.com/m000394.htm http://www.drugs.com/vet/furazolidone-aerosol-powder.html Federal law prohibits the use of this product in food-producing animals.	Contains chemicals known to the state of California to cause cancer. Should only be taken under strict medical oversight; dangerous if taken with alcohol, when pregnant, or for individuals with certain blood disorders. Adverse effects include headache, stomach upset, nausea, vomiting, dizziness or weakness, fever, skin rash, itching, muscle aches, flushing, breathing trouble. This medication may cause the urine to turn brown in color.
52.	Furosemide	<u>Diuretic:</u> Lasix Used in humans and horses	May cause pancreatitis, jaundice, anorexia, paresthesias, ototoxicity, blood dyscrasias, dizziness, rash, urticaria, photosensitivity, fever, thrombophlebitis, restlessness. http://www.pdr.net/search/searchResult.aspx?searchCriteria=Furosemide
53.	Gentamicin sulfate solution	<u>Antibiotic:</u> Gentamicin solution Do not use for horses intended for human consumption. http://www.drugs.com/vet/gentamicin-sulfate-solution.html 21 CFR § 529.1044a - “Do not use in horses intended for human consumption.”	Can cause severe hearing and kidney problems. May cause dizziness, vertigo, ringing in the ears, hearing loss, numbness, muscle twitching or weakness, difficulty breathing, decreased urination, rash, itching, or sore throat. Interaction and potential harm with other drugs can cause adverse reactions.
54.	Gentian violet	Blue-Kote	Usually used topically on humans. Unknown side effects upon ingestion.

	Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
		Topical ointment, antiseptic, protective wound dressing. Not for use on food producing animals. http://www.drugs.com/vet/dr-naylor-blu-kote.html http://www.drugmaylor.com/index.php?option=com_content&task=blogcategory&id=20&Itemid=47 “Not for use on animals intended for food.” http://www.horsesuppliesplus.com/antiseptics.html	
55.	HCl	Component of Dexium injection http://www.drugs.com/vet/dexium-injection.html	Very hazardous if touched; not fully tested on humans; may be fatal if inhaled or swallowed. Causes irritation and burning, ulceration, or perforation of the gastrointestinal tract and resultant peritonitis, gastric hemorrhage and infection. Can also cause nausea, vomiting (with “coffee ground” emesis), diarrhea, thirst, difficulty swallowing, salivation, chills, fever, uneasiness, shock, strictures and stenosis (esophageal, gastric, pyloric). May affect behavior (excitement), the cardiovascular system (weak rapid pulse, tachycardia), respiration (shallow respiration), and urinary system (kidneys- renal failure, nephritis). Acute exposure via inhalation or ingestion can also cause erosion of tooth enamel.
56.	Hyaluronate sodium	Arthritis treatment Legend Legend injectable 21 CFR § 522.1145 - “Do not use in horses intended for human consumption.” - “Not for use in horses intended for food.” http://www.bayerdvm.com/products/legend/legend.cfm http://www.drugs.com/vet/legend-multi-dose-hyaluronate-sodium-injectable-solution.html	May cause gastrointestinal tract information with nausea and vomiting. It may affect blood (normocytic anemia, change in leukocyte count), metabolism, behavior (ataxia, convulsions), respiration (respiratory stimulation), and urinary system. The toxicological properties of this substance have not been fully investigated. http://www.sciencelab.com/msds.php?msdsId=9924276
57.	Hyaluronic acid sodium salt	Polyglycan	May cause gastrointestinal irritation, affect blood, metabolism and behavior. The dangers upon ingestion by humans has not been fully investigated.

	Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
		For use only as a surgical lavage in animals not intended for food use. http://www.medi-vet.com/Polyglycan.aspx Also used in race horses prior to a race.	
58.	Hydroxyzine Pamoate	Anti-anxiety in humans and preoperative sedation. Antihistamine, anti-itching and sedative in animals. http://www.drsofstersmith.com/product/prod_display.cfm?pcatid=20678	May impair mental and physical abilities in elderly, may potentiate other medications, and not for use by pregnant or nursing mothers. http://www.pdr.net/drugpages/concise/monograph.aspx?concise=1096
59.	Hyoscine butylbromide	Buscopan Scopolamine Antispasmodic; colic pain relief. http://www.drugs.com/vet/buscopan-sterile-solution-can.html	Potential adverse effects include blurred vision, severe allergic reactions, confusion, urinary problems, and mood changes. www.drugs.com/sfx/scopolamine-side-effects.html
60.	Isoflurane	Surgical anesthetic 21 CFR § 529.1186 - “Do not use in horses intended for human consumption.”	MSDS reports no information on toxicity upon ingestion.
61.	Isoparaffinic Petroleum Solvent	Fly Control: Farnam Bronco Gold (spray) Farnam Wipe http://msds.farnam.com/m001650.htm http://msds.farnam.com/m000490.htm	Unknown human toxicity and side effects after ingestion.
62.	Ivermectin	Dewormers: Agri-mectin Paste Bimectin Paste Equell Paste	Can act for up to twelve months; carcinogenicity not studied; not recommended for pregnant women; distributes into breast milk. Adverse reactions include pruritus, edema, papular/pustular/frank urticarial rash, fever, axillary/cervical/inguinal lymphadenopathy, arthralgia/synovitis, limbitis, tachycardia, peripheral edema, leukopenia, eosinophilia

	Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
		Equimax Farnam Ivercare Horse Health Ivermectin Ivercare paste ProMetin E™ Paste Zimecterin Gold Zimecterin Paste Also found in human anthelmintic compounds 21 CFR § 520.1192 - Paste - “Do not use in horses intended for human consumption.” 21 CFR § 1194 - Meal - “Do not use in horses intended for human consumption.” 21 CFR § 1195 - Liquid - “Do not use in horses intended for human consumption.” 21 CFR §1198 - Ivermectin and praziquantel paste - “Do not use in horses intended for human consumption.” http://www.drugs.com/vet/agri-mectin-paste-1-87.html http://www.drugs.com/vet/agri-mectin-paste-1-87.html http://www.davisandlawrence.com/1-x-6-08-g.html http://www.horsehealthusa.com/details/Equell-Paste/37-105.html http://www.equimaxhorse.com/	http://www.pdr.net/search/searchResult.aspx?searchCriteria=ivermectin

	Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
63.	Ketoprofen	NSAID: Ketofen Used as NSAID in horses and humans. 21 CFR § 522.1225 - “Not for use in horses intended for food.” http://www.drugs.com/vet/ketofen.html	Ketoprofen is one of the NSAIDs, all of which have extensive potential adverse side effects in humans including cardiovascular, gastrointestinal, kidney and eye problems. The NSAIDs can be dangerous for individuals with blood disorders. They are also contraindicated during pregnancy. They also present significant risk for people with a history of ulcers or gastrointestinal bleeding. Can cause nausea, abdominal pain, diarrhea, headaches, excitability, and nervous system problems.
64.	Levothyroxine Sodium	Thyro-L Thyroid replacement hormone. http://www.drugs.com/vet/thyro-l.html	This artificial thyroid hormone can exacerbate thyroid and hypertension problems in susceptible individuals. http://www.pdr.net/search/searchResult.aspx?searchCriteria=Levothyroxine+Sodium
65.	Luprostiol	For control of reproductive cycles and inducing termination of pregnancy. 21 USC § 522.1290 - solution - “Do not use in horses intended for human consumption.” - “Labeling shall bear the following statements: Warning: Women of child-bearing age, asthmatics, and persons with bronchial and other respiratory problems should exercise extreme caution when handling this product. In the early states, women may be unaware of their pregnancies...”	Dangerous for children, pregnant and lactating mothers, individuals with respiratory problems. Can cause hormonal effects when taken.
66.	Mepivacaine	Anesthetic 21 CFR § 522.1372 - “Not for use in horses intended for human consumption.”	Because this is an injectable drug, studies have not been done on the dangers of ingestion.
67.	Methocarbamol	Robaxin Muscle relaxant in animals and humans.	Potential adverse reactions include lightheadedness, dizziness, drowsiness, nausea, urticaria, pruritus, rash, conjunctivitis, nasal congestion, blurred vision, headache, fever, seizures, syncope, flushing. http://www.pdr.net/search/searchResult.aspx?searchCriteria=Methocarbamol

	Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
68.	Methyl Salicylate	http://www.petplace.com/drug-library/methocarbamol-robaxin-in-v/page1.aspx Scarlet Oil Wound dressing for horses. Muscle and joint pain relief in humans. Not for use on animals intended for food. http://www.drugs.com/vet/scarlet-oil.html	“When ingested, the highly concentrated liquid methyl salicylate in the form of wintergreen oil, as with other volatile oils, can induce vomiting and is a notorious source for severe, often fatal poisonings.” http://www.drugs.com/npp/wintergreen.html Dangerous if used in conjunction with other analgesics, anticoagulants, steroids, NSAIDs, alcohol, and diuretics. http://www.pdr.net/search/searchResult.aspx?searchCriteria=Methyl+Salicylate
69.	Methylandrostenediol	Methandriol Anabolic steroid Used as growth stimulator and steroid in horses and humans. http://www.drugs.com/international/methandriol.html	Can cause estrogenic (female hormone) and androgenic (male hormone) effects. Steroids should be taken under a doctor’s supervision and have multiple significant adverse affects including severe allergic reactions, hormonal changes, changes in menstrual functions, mental and mood changes, respiratory problems, nausea and vomiting, joint swelling, vision changes, and unusual weight gain.
70.	Methylprednisolone	Human and horse steroid 21 CFR § 522.1410 - “Do not use in horses intended for human consumption.”	Steroids should be taken under a doctor’s supervision and have multiple significant adverse affects including severe allergic reactions, hormonal changes, changes in menstrual functions, mental and mood changes, respiratory problems, nausea and vomiting, joint swelling, vision changes, and unusual weight gain.
71.	Metronidazole	Antibiotic in humans and horses (Flagyl) http://www.wedgewoodpetrx.com/learning-center/professional-monographs/metronidazole-for-veterinary-use-ab.html	This drug can cause gastrointestinal problems, serious allergic reactions in sensitive individuals, flu-like symptoms, seizures, encephalopathy, aseptic meningitis, peripheral neuropathy, nausea and vomiting, headache, anorexia and neutropenia. http://www.pdr.net/search/searchResult.aspx?searchCriteria=Metronidazole
72.	Moxidectin	Quest Gel Quest Plus Antiparasitic (dewormers) Not for horses or ponies intended for human consumption. http://www.fda.gov/AnimalVeterinary/GuidanceComplianceEnforcement/	Very limited testing on humans – potential adverse effects still unknown.

	Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
		ComplianceEnforcement/ucm168782.htm 21 CFR § 520.1452; 520.1463 - Gel - “Not for use in horses and ponies intended for food.” http://www.drugs.com/vet/question-plus-equine-oral-gel.html	
73.	N-(2-Ethylhexyl)-5-norbornene-2,3-dicarboximide	Bug Block (fly control) http://absorbine.org/products/flycontrol/bug-block-insecticide-repellent http://www.statelinetack.com/ContentFiles/Associated_Content/absorbinebugblockMSTDS.pdf	“Harmful if ingested.” Bug Block fly control has multiple adverse effects if swallowed by humans. http://www.statelinetack.com/ContentFiles/Associated_Content/absorbinebugblockMSTDS.pdf
74.	N-acetyl-D-glucosamine 10%	Polyglycan Post-surgical lavage of joint compartments. “Do not administer to animals that are to be slaughtered for food.” www.arthrodynamic.com/polyglycan/	Ingredient in Polyglycan, which includes warning: “For use only as a surgical lavage in animals not intended for food use.” http://www.medi-vet.com/Polyglycan.aspx
75.	Neomycin Sulfate	Animax ointment Human and animal antimicrobial, anti-fungal steroid drug	May cause nausea and vomiting, diarrhea, malabsorption syndrome, nephrotoxicity, ototoxicity, neuromuscular blockade, neurotoxicity, fetal harm. Especially dangerous for individuals with certain diseases of the muscles. http://www.pdr.net/drugpages/concise/monograph.aspx?concise=3174
76.	Nitrofurantoin	Equifur Antibacterial for urinary tract infections in horses and humans. This drug is not to be administered to horses that are to be slaughtered for use in food. http://www.drugs.com/vet/equifur-can.html	Adverse effects include hypersensitivity reactions, pulmonary/hepatic/psychotic reactions, peripheral neuropathy, nausea and vomiting, anorexia, dizziness, exfoliative dermatitis, anaphylaxis, hematologic abnormalities, cyanosis, angioedema, asthenia. http://www.pdr.net/drugpages/concise/monograph.aspx?concise=383

	Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
77.	Nitrofurazone	Niderm Ointment Antibacterial ointment, burns, skin grafts. 21 CFR § 524.1580b - “Do not use in horses intended for human consumption.” - “Federal law prohibits the use of this product in food-producing animals.” Federal law prohibits the administration of this preparation to animals that produce food or that are intended for consumption as food. http://www.drugs.com/vet/niderm-ointment-can.html	Very toxic to humans. http://www.sciencelab.com/msds.php?msdsId=9926271
78.	N-Octyl Bicycloheptene Dicarboximide	Farnam Roll-On Repellent Fly spray http://msds.farnam.com/m000018.htm	According to the manufacturer, Farnam Roll-On Repellent is “harmful if swallowed.”
79.	Nystatin	Antimicrobial, antifungal and steroid Animax ointment Mycostatin Bio-Statin For use in humans and horses with thrush.	Adverse reactions include oral irritation, sensitization, diarrhea, nausea and vomiting, gastrointestinal disturbances, rash, urticaria, Stevens-Johnson syndrome. http://www.pdr.net/search/searchResult.aspx?searchCriteria=Nystatin See also: http://www.ncbi.nlm.nih.gov/pubmedhealth/PMH0000767/ http://www.nlm.nih.gov/medlineplus/druginfo/meds/a682758.html
80.	Omeprazole	Treatment for ulcers in horses and humans. Gastrogard 21 CFR § 520.1615 - “Do not use in horses intended for human consumption.” http://gastrogard.us.merial.com/faq.shtml	Adverse reactions include headache, diarrhea, abdominal pain, nausea and vomiting, fever, respiratory disorders, severe allergic reactions, irregular heartbeat, bruising and bleeding. http://www.pdr.net/search/searchResult.aspx?searchCriteria=Omeprazole
81.	Oxibendazole	Anthelmicide dewormer	“Do not allow product to enter drinking water supplies, waste water or soil.”

	Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
		21 CFR § 520.1638 - paste - “Not for use in horses intended for human consumption.” 21 CFR § 520.1638 - Suspension - “Not for use in horses intended for human consumption.” Not for use in horses intended for human consumption. http://www.drugs.com/vet/anthelcide-eq-equine-wormer-paste.html	http://www.seqchem.com/safetysheet.php?SQIndex=SRP0124910
82.	Parachlorometaxylenol	Scarlet Oil Not for use on animals intended for food. http://www.drugs.com/vet/scarlet-oil.html	May cause burning of mouth, throat and stomach, if ingested. http://surfactantsinc.com/pdf/Surcide%20PCMX-USP%20MSDS.pdf
83.	Phenol	Red-Kote Not for use on animals intended for food. http://www.drugs.com/vet/dr-naylor-red-kote.html	Phenol is considered to be quite toxic to humans via oral exposure. Anorexia, progressive weight loss, diarrhea, vertigo, salivation, a dark coloration of the urine, and blood and liver effects have been reported in chronically (long-term) exposed humans. Animal studies have reported reduced fetal body weights, growth retardation, and abnormal development in the offspring of animals exposed to phenol by the oral route. http://www.epa.gov/ttn/atw/hlthef/phenol.html
84.	Phenylbutazone	NSAID: Butazone 400 Butazone 1000 Butazone Concentrate Bute paste Butequine 21 USC §520.1770a - Tablets and boluses - Dogs and horses - “Do not use in horses intended for human consumption..” 21 USC § 522.1720	Serious and fatal adverse effects have been reported from ingestion of Phenylbutazone, including bone marrow suppression and aplastic anemia. Banned in America for human use. Nicholas Dodman, Nicolas Blondell, Ann M. Marini, “Association of phenylbutazone usage with horses bought for slaughter: A public health risk”, FOOD AND CHEMICAL TOXICOLOGY 48 (2010) 1270–74. “Phenylbutazone is known to induce blood dyscrasias, including aplastic anemia, leukopenia, agranulocytosis, thrombocytopenia and deaths. Hypersensitivity reactions of the serum-sickness type have also been reported. In addition, phenylbutazone is a carcinogen, as determined by the National Toxicology Program.” http://www.fda.gov/AnimalVeterinary/NewsEvents/CVMUpdates/ucm124078.htm Phenylbutazone is especially problematic for patients with a history of asthma attacks, hives, or other allergic reactions to aspirin or other NSAIDs. It also should be avoided by patients with peptic ulcer disease or poor kidney function, since this medication

	Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
		- Injection - Dogs and horses - “Not for use in animals intended for food.” http://horsebackmagazine.com/hb/arc-hives/13184 http://www.farmvet.com/pc-1500-163-bute-paste-12-gm.aspx http://www.drugs.com/vet/butequine-can.html http://tuesdayshorse.wordpress.com/tag/cfia/	can aggravate both conditions. Phenylbutazone is generally used with caution in patients taking blood thinning medications (anticoagulants), such as warfarin (Coumadin), because of an increased risk of bleeding. Patients taking lithium can develop toxic blood lithium levels. Additionally, patients taking cyclosporine (Sandimmune) can develop kidney toxicity.
85.	Piperonyl Butoxide	Repel-XP Fly control Do not use on horses intended for human consumption. http://www.drugs.com/vet/repel-xp-emulsifiable-fly-spray.html	Potential dangers to humans are unknown: “Data are not available from accidental poisonings, occupational exposures, or epidemiological studies regarding the reproductive and developmental toxicity of piperonyl butoxide.” npic.orst.edu/factsheets/pbotech.pdf Ingestion can cause vomiting and diarrhea. Pesticide Action Network North America. Piperonyl Butoxide, http://www.pesticideinfo.org/Detail_Chemical.jsp?Rec_Id=PC33240 The EPA classifies piperonyl butoxide as a group C carcinogen, a possible human carcinogen. Environmental Protection Agency. Reregistration Eligibility Decision for Piperonyl Butoxide. (June 2006). http://www.epa.gov/opp00001/reregistration/REDs/piperonyl_red.pdf
86.	Polysulfated Glycosaminoglycan	Adequan Joint treatment. 21 USC § 522.1850 - “Do not use in horses intended for human consumption.”	Data on human safety, pertaining to consumption of drug residues in food, were not required for approval of this supplemental new animal drug. The drug is approved for use only in horses that are not to be used for food and is to be labeled “Not for use in horses intended for food.” http://www.fda.gov/AnimalVeterinary/Products/ApprovedAnimalDrugProducts/FOIADDrugSummaries/ucm054846.htm Based on the formulation of the drug, humans could develop anaphylaxis or excessive bleeding as the sulfated proteoglycans are anticoagulants.
87.	Ponazuril	Antiprotozoal Marquis paste; Marquis 21 CFR § 520.1855 - Horses only - “Not for use in horses intended	Unknown side effects and adverse reactions in humans ingesting Ponazuril. “Data on human safety, pertaining to consumption of drug residues in food, were not required for approval of this supplemental new animal drug. The drug is approved for use only in horses that are not to be used for food and is to be labeled ‘Not for use in horses intended for food.’” Freedom of Information Summary, Original New Animal Drug Application, NADA

	Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
		for food.” “Not for use in horses intended for food.” http://www.drugs.com/vet/marquis-15-w-w-ponazuril-antiprotozoal-oral-paste.html	141-188 (Marquis), www.fda.gov/downloads/AnimalVeterinary/.../ucm117581.pdf
88.	Prallethrin	Insecticide Mosquito Halt Fly spray http://www.drugs.com/vet/mosquito-halt-repellent-spray-for-horses.html	Potential poisoning, headache, dizziness, nausea, and seizure. http://www.pesticideinfo.org/Detail_Chemical.jsp?Rec_Id=PC35755 “Pyrethroid ingestion gives rise within minutes to a sore throat, nausea, vomiting and abdominal pain. There may be mouth ulceration, increased secretions and/or dysphagia. Systemic effects occur 4-48 hours after exposure. Dizziness, headache and fatigue are common, and palpitations, chest tightness and blurred vision less frequent. Coma and convulsions are the principal life-threatening features. Most patients recover within 6 days. . . .” S.M. Bradberry <i>et al.</i> , <i>Poisoning Due to Pyrethroids</i> , Toxicol Rev. 24(2):93-106 (2005) (quoting abstract).
89.	Praziquantel	Dewormer For horses and humans Equimax Quest Plus Zimecterin Gold http://www.equimaxhorse.com/ http://www.drugs.com/vet/quest-plus-equine-oral-gel.html “Not for use in humans.” (Zimecterin) http://www.zimecterin.com/ZimecterinGold/index.html?#50	Available by prescription only and to be taken only under the monitoring of a physician. Contraindicated for people with pre-existing conditions involving the liver, kidney, or heart. Praziquantel may cause side effects including headache, dizziness, stomach pain, nausea, fever, itching, hives (especially serious). http://www.ncbi.nlm.nih.gov/pubmedhealth/PMH00000474/ http://www.rxlist.com/biltricide-drug/patient-images-side-effects.htm
90.	Prednisone	Human and horse steroid 21 USC § 522.1890 - Horses, dogs and cats - “Not for use in horses intended for human consumption.”	Steroids should be taken under a doctor’s supervision and have multiple significant adverse affects including severe allergic reactions, hormonal changes, changes in menstrual functions, mental and mood changes, respiratory problems, nausea and vomiting, joint swelling, vision changes, and unusual weight gain.
91.	Prostaglandin	Lutalyse solution Horse and human use – regulation of	Can cause unknown and unwanted hormonal effects, including termination of pregnancy, to individuals who ingest without knowing.

	Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
		female reproduction and other uses. This drug is not to be administered to horses that are to be slaughtered for use in food. http://www.drugs.com/vet/lutalyse-sterile-solution-can.html	
92.	Pseudoephedrine HCl	Tri-Hist Granules Not for use in horses intended for food. http://www.drugs.com/vet/tri-hist-granules.html	Can cause central nervous stimulation, insomnia, anxiety, dizziness, blurred vision, colitis, and psychosis when combined with other drugs.
93.	Pyrantel Pamoate	Exodus Paste Dewormer 21 CFR § 520.2044 - Horses and ponies - “Do not use in horses intended for human consumption.” 21 CFR § 520.2043 - Horses and ponies - “Do not use in horses intended for human consumption.” http://www.drugs.com/vet/exodus-paste.html	Adverse reactions include abdominal cramps, nausea and vomiting, diarrhea, headache, dizziness. http://www.pdr.net/drugpages/concisenonograph.aspx?concise=2985
94.	Pyridoxine HCl	Liver 7 injection	Potential health effects after ingestion unknown. http://www.sciencelab.com/msds.php?msdsId=9924765
95.	Pyrilamine Maleate USP	Tri-Hist Granules Antihistamine (human and horse use) 21 CFR § 522.2063 - “Do not use in horses intended for food purposes.” Not for use in horses intended for food. http://www.drugs.com/vet/tri-hist-granules.html	Many individuals with identified health conditions have hypersensitivities to antihistamines and the use of antihistamines is contraindicated in that portion of the population. http://www.drugs.com/pro/poly-hist-pd.html

	Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
96.	Rabies vaccination	Imovax Rabies Vaccine	The dangers of human ingestion are unknown.
97.	Ractopamine hydrochloride	Optaflexx 100 Premix Beta-agonist used for growth promotion purposes	A January 2012 article reported that ractopamine hydrochloride is “[f]led to an estimated 60 to 80 percent of pigs in the United States, [and has] has sickened or killed more of them than any other livestock drug on the market.” While the FDA has approved the drug for use in cows and pigs, many countries have banned it from food-producing animals, and the drug has never been tested on horses intended for human consumption. http://bottomline.msnbc.msn.com/_news/2012/01/25/10220221-dispute-over-drug-in-feed-limiting-us-meat-exports
98.	Rhinopneumonitis vaccine	5-way (vaccination) http://www.alpineanimal.net/page6263a3c5.html?inc=na	Unknown consequences for humans.
99.	Ronidazole	Antiprotozoal agent http://www.wedgewoodpetrx.com/ite/ms/ronidazole-capsule.html	Does not appear to have any human applications. Dangerous side effects in animals. Toxicity information and potential health effects are unknown. https://www.reagentworld.com/products/msds2.asp?prod_2=23072
100.	Selenium	Trace mineral supplement 21 USC § 522.2100 - “Do not use in horses intended for food.”	Rare but potential side effects include nausea, vomiting, abdominal pain, hearing loss, fatigue, weight loss, muscle tenderness, heart failure, and allergic reactions.
101.	Stanozolol	Anabolic steroid Used in both animals and humans. 21 USC 522.2150 - “Not for use in horses intended for food.” http://www.petplace.com/drug-library/stanozolol-winstrol/page1.aspx	Potential side effects of anabolic steroids are well-documented. Steroids should be taken under a doctor’s supervision and have multiple significant adverse affects including severe allergic reactions, hormonal changes, changes in menstrual functions, mental and mood changes, respiratory problems, nausea and vomiting, joint swelling, vision changes, and unusual weight gain
102.	Stillbenes	Used in estrogen-related substances	Animals treated with these drugs are banned from meat production in the European Union. http://eur-lex.europa.eu/smartapi/cgi/sga_doc?smartapi!celexplus!prod!CELEXnumdoc&lg=EN&numdoc=32008L0097
103.	Strangles vaccine (Streptococcus Equi vaccine)	Vaccination for <i>streptococcus equi</i> http://www.aaep.org/strangles.htm Pinnacle I.N. (strangles)	Dangers of human ingestion unknown.

	Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
		http://www.drugs.com/vet/pinnacle-i-n.html	
104.	Sucralfate	Used to aid in healing gastrointestinal tract, ulcers, for humans and animals.	Adverse reactions include constipation, diarrhea, nausea and vomiting, pruritus, rash, dizziness, insomnia, back pain, headache, dry mouth, flatulence, gastric discomfort, indigestion, sleepiness. http://www.pdr.net/search/searchResult.aspx?searchCriteria=Sucralfate
105.	Sulfadiazine	Tribissen (oral) 400 paste 21 CFR § 520.2215 - “Do not use in horses intended for human consumption.” 21 CFR § 520.2260a - “Do not use in horses intended for human consumption.” http://www.drugs.com/vet/tribissen-400-oral-paste.html	Sulfadiazine has potential cross-sensitivity with other drugs in the same class. Some individuals will have blood cell destruction from the drug. It can also cause transient leukopenia, skin necrosis, skin discoloration, burning sensation, rash, interstitial nephritis, and other systemic reactions. http://www.pdr.net/search/searchResult.aspx?searchCriteria=Sulfadiazine
106.	Sulfamethoxazole Trimethoprim	Antibacterial Bactrim, Septra http://www.horse.com/ContentFiles/Associated_Content/ultrashieldexlab el.pdf	While these drugs are approved for human use, unnecessary ingestion of antibiotics is medically contraindicated. Additionally, adverse reactions include nausea and vomiting, anorexia, allergic skin reactions (e.g., rash, urticaria), agranulocytosis, aplastic anemia, hepatitis, renal failure, hyperkalemia, aseptic meningitis, arthralgia, convulsions, cough.
107.	Sunscreens	Components in various fly spray products http://www.horse.com/ContentFiles/Associated_Content/ultrashieldexlab el.pdf	While sunscreens are used by humans, there is no substantial literature or studies on ingestion of sunscreens or their byproducts and metabolites.
108.	Testosterone enanthate	Uni-Bol Male sex hormone http://www.drugs.com/vet/uni-bol-can.html	The ingestion of male hormones, when not medically indicated, can create hormonal imbalances. Additionally, use may cause dangerous reactions in hypersensitive individuals or those with other illnesses. Can increase prostate and other problems in elderly men. Can also cause hormone-mediated reactions, fluid and electrolyte disturbances, nausea, cholestatic jaundice, alterations in liver function, headache, and anxiety. It is also designated as “not for use” in nursing mothers. http://www.pdr.net/drugpages/concisenomograph.aspx?concise=2017
109.	Thiamine HCl	Included in liver 7 injection http://www.drugs.com/vet/liver-7-injection.html	Hazardous in case of ingestion. http://www.sciencelab.com/msds.php?msdsId=9925232

	Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
110.	Thyrostats	Thyroid-related growth promotion Antithyroid agents for the purpose of growth promotion	Animals treated with these drugs are banned from meat production in the European Union. http://eur-lex.europa.eu/smartapi/cgi/sga_doc?smartapi!celexplus!prod!CELEXnumdoc&lg=EN&numdoc=32008L0097 .
111.	Topazone Aerosol Powder	Antibacterial Topazone Furox http://www.fda.gov/AnimalVeterinary/NewsEvents/CVMUpdates/ucm137145.htm	Contains chemicals known to the state of California to cause cancer. Should only be taken under strict medical oversight; dangerous if taken with alcohol, when pregnant, or for individuals with certain blood disorders. Adverse effects include headache, stomach upset, nausea, vomiting, dizziness or weakness, fever, skin rash, itching, muscle aches, flushing, breathing trouble. This medication may cause the urine to turn brown in color.
112.	Triamcinolone Acetonide	Component in Animax ointment Antimicrobial, anti-fungal, steroid (for thrush treatment) 21 CFR § 520.2483 - tablets - “Do not use in horses intended for human consumption.” 21 CFR § 522.2483 - Suspension - “Do not use in horses intended for human consumption.”	Steroids should be taken under a doctor’s supervision and have multiple significant adverse effects including severe allergic reactions, hormonal changes, changes in menstrual functions, mental and mood changes, respiratory problems, nausea and vomiting, joint swelling, vision changes, and unusual weight gain.
113.	Trimethoprim	Uniprim antibiotic Powder For treatment of <i>Streptococcus equi</i> (“Strangles”) 21 CFR § 520.2611 - “Do not use in horses intended for human consumption.” 21 CFR § 520.2613 - Trimethoprim and sulfadiazine powder - “Not for use in horses intended for food.” “Do not use in horses intended for human consumption.”	Trimethoprim is a strong antibiotic with multiple potential adverse reactions, adverse interactions with other drugs and hypersensitivities noted in individuals with various diseases and metabolic conditions. http://www.ncbi.nlm.nih.gov/pubmedhealth/PMH00000813/

	Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
		http://www.drugs.com/vet/tribrissen-400-oral-paste.html http://www.drugs.com/vet/uniprim-powder.html	
114.	West Nile virus	Recombitek West Nile Vaccine http://www.drugs.com/vet/recombitek-equine-west-nile-virus-can.html	This vaccine has only been approved for use in horses and no data exists with respect to the safety of humans eating it, or meat from animals who have received it.
115.	Xylazine	Sedative Anased 21 CFR § 522.2662 - “Not for use in horses intended for food. - “Do not use in domestic food-producing animals.”	Xylazine poisoning causes hypotension, bradycardia, and respiratory depression. Ocular administration can cause sinus bradycardia, hypotension and decreased mental status. Velez LI, Shepherd G, Mills LD, Rivera W., <i>Systemic toxicity after an ocular exposure to xylazine hydrochloride</i> , J. EMERG. MED. 30(4):407-10 (2006).

EXHIBIT 2

DECLARATION OF HILARY WOOD

I, Hilary Wood, declare as follows:

1. I am the President and Founder of Front Range Equine Rescue (“FRER”), a 501(c)(3) nonprofit organization incorporated in Colorado. I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection. If called, I could and would testify to these facts in a court of law.

2. Petitioner FRER is a Colorado-based nonprofit group incorporated under Section 501(c)(3) of the Internal Revenue Code. FRER is dedicated to stopping cruelty and abuse of horses through rescue and education. FRER is actively involved in the rescue, rehabilitation and adoption to good homes of domestic and wild horses found at auctions and horses destined for slaughter; and in educational efforts regarding responsible horse ownership, the cruelty of horse slaughter and wild horse roundups. FRER has assisted thousands of horses through its rescue and educational programs. While some of FRER’s horses are surrendered by their owners or rescued when abandoned, many are rescued from livestock auctions; others are purchased at feed lots before they are sent to slaughter.

3. FRER directly rescues approximately 100 – 120 new horses per year. FRER horses live at facilities owned by FRER, at private foster homes, or at other privately contracted facilities.

4. One of FRER’s primary goals is to purchase horses destined for slaughter for human consumption. Once rescued, FRER provides for the direct care and rehabilitation of these horses, provides training assessment, and then adoption into permanent and suitable homes for them.

5. I have personally been housing and providing for the care of horses for over twenty years.

6. In connection with my work with FRER and my own personal ownership of horses, I have become intimately familiar with the drugs, treatments and substances used by horse owners in America.

7. I assisted in the preparation of and have reviewed Exhibit 1 to the Petition for Rulemaking being submitted by FRER. Every item on that list is either commonly found in barns housing horses, and is used on those horses, or is found in catalogues and supply stores, for sale to private horse owners in America or available with a veterinarian's prescription. I am personally familiar with and use or have used at least 50 of the substances on that list, and am informed and believe that all of those substances are used regularly on companion, pleasure and recreation, and competition/show horses.

8. FRER has rescued horses from auction lots who were born as wild horses, captured by the federal Bureau of Land Management ("BLM"), and eventually ended up for sale. I have also directly adopted wild horses from the BLM. Records that accompanied these horses showed that they received some of the drugs on Exhibit 1, including but not limited to a series of vaccinations for many diseases, dewormers, which are labeled as prohibited for use in animals which will be eaten.

9. As part of FRER's mission, I have participated in the purchase of slaughter-bound horses directly from lots that were the horses' last stop before slaughter. Many of those horses, who would have entered the slaughter process otherwise, were sick with contagious respiratory illnesses. Many others developed serious illnesses, such as *Streptococcus equi* ("strangles"), a virulent and highly contagious equine infection, within a week of our acquisition.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge and experience.

Executed this 9th day of March, 2012, in Larkspur, Colorado.


Hilary Wood

EXHIBIT 3

DECLARATION OF PEGGY W. LARSON, DVM, MS, JD

I, Peggy W. Larson, declare as follows:

1. I am a doctor of veterinary medicine, currently practicing in Vermont. I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection.
2. As described in the attached Curriculum Vitae, I am a licensed large animal veterinarian and have been practicing veterinary medicine for over 45 years. I received a Doctorate of Veterinary Medicine from the University of Ohio in 1965, a Masters of Science in comparative pathology from the University of California at Davis in 1968, and a Juris Doctorate from Vermont Law School in 1988.
3. From 1968 to 1978, I was a practicing large animal veterinarian in North Dakota, focusing on food animal and equine medicine and surgery. I performed diagnosis, treatment, and surgery, and frequently assessed, observed, and treated horses in my professional capacity.
4. I served as a Veterinary Medical Officer for the United States Department of Agriculture (USDA) from 1979 to 1985. In this capacity, I managed federal livestock disease control programs in Vermont, performed animal welfare inspections at circuses and research facilities, and issued federal health certificates on export animals.
5. In 1984, I was appointed by the Governor of Vermont to the position of Vermont State Veterinarian and Acting Chief of Livestock and Meat Inspection. In this position, I managed ongoing livestock and meat inspections programs and rewrote Vermont's meat and poultry inspection regulations. For approximately four months, I inspected all of Vermont's slaughter facilities until a permanent veterinary meat inspector was hired.
6. As a veterinarian and a former USDA employee, I am familiar with the variety of drugs, substances and treatments given to American horses. I also have personal

knowledge regarding the issues surrounding the slaughtering of horses for human consumption, including the sources from which horses for human consumption originate, and horse slaughter welfare issues in general. As a large animal veterinarian, I have observed horses first hand in small and large communities throughout the country.

7. I have reviewed Exhibit 1 to the Petition for Rulemaking submitted by Front Range Equine Rescue. Based on my experience and knowledge of the industry, I am informed and believe that many of the drugs, substances and treatments listed on Exhibit 1 are commonly used on American horses in the companion, competitive and sport areas. Many of those drugs are prohibited for use in horses intended for human consumption, and others have never been tested on humans to determine the effect of ingestion, or the degree to which any residue of these drugs, treatments and substances remains in horses who have been exposed to them.
8. Based on longstanding medical and scientific principles, it is impossible to declare horse meat safe for human consumption when the horses who are slaughtered for that meat have been exposed to an unidentified (and unidentifiable) number of drugs, treatments and substances, in unknown (and unknowable) quantities, at various times during their life.
9. In order for horse meat to be safe for human consumption, each of these drugs will have to be identified and the following will have to be determined: the length of time the drug is present in the horse after the last administration of the drug, what drug residuals remain after a specified waiting period, how much residue is allowable in the meat, and the toxic effects of the drug in humans, including humans who may have special sensitivities or medical conditions that may make them more susceptible to these drugs.
10. In order for horse meat to be safe for human consumption, a testing method will have to be developed to identify and quantify each of the drugs, treatments and

substances commonly used on American horses. Until these criteria are met, horse meat has to be deemed unsafe for human consumption.

11. Based on the foregoing and my training and experience, it is my professional opinion that American horses who are sent to slaughter for human consumption have potentially been treated with a variety of drugs, treatments and substances that potentially renders their flesh dangerous to people who eat horse meat and makes the horses' meat unsafe for human consumption.
12. Horses bound for slaughter are frequently shipped for long distances, and sometimes in a manner that fails to accommodate their unique temperaments and physical requirements. See C.L. Stull, *Response of Horses to Trailer Design, Duration, and Floor Area During Commercial Transportation to Slaughter*, J. ANIM. SCI. 77:2925-2933 (1999). Transported horses are often not given food and water every 28 hours, despite the federal law. T.H. Friend, *A Review of Recent Research on the Transportation of Horses*, 79 J. ANIMAL SCI. E32 (2001) ("Continuous transport of slaughter horses for 30 hours is common, and some trips last 36 hours or longer.").
13. Because of the methods of transport, horses often suffer a variety of injuries and illnesses during transport. See, e.g., K.A. Houpt & S. Lieb, *Horse Handling and Transport*, LIVESTOCK HANDLING AND TRANSPORT (2000) (describing "moderately severe back injuries" in transported horses); G. Giovagnoli, M. Trabalza Marinucci, A. Bolla & A. Borghese, *Transport Stress in Horses: An Electromyographic Study on Balance Preservation*, 73 LIVESTOCK PRODUCTION SCIENCE 247 (2002). The lack of proper food and water in already weakened animals can lead to further injuries, illness and death during extended transport.
14. Consequently, many horses may arrive at the slaughterhouse too sick or injured to stand up and walk. If they are ill, the microorganisms and other infecting agents would taint their meat and render it unsafe for human consumption.

15. The horses that survive transport are put into holding pens at the slaughter plant. These pens often lack shelter and expose the horses to extreme temperatures, rain and snow. This further increases the chances of disease and infection, and the possibility that the horses' meat will have dangerous microorganisms or other problems that could make their flesh dangerous if it was turned into meat.
16. As summarized in one study, "slaughter horses have usually been trucked for extensive distances. Many times they are injured or unhealthy, housed poorly, fed and watered improperly, and sometimes held for long times, as much as a week, in dirty confined pens at the slaughter plant." Gary D. Anderson & Don R. Lee, *Salmonella in Horses: A Source of Contamination of Horsemeat in a Packing Plant Under Federal Inspection*, 31 APPLIED AND ENVIRONMENTAL MICROBIOLOGY 661 (1975). This type of situation creates great potential for the growth of bacteria that can lead to severe health problems in humans who eat the meat of these horses.
17. During my tenure as a meat inspector in Vermont, I inspected slaughter animals, mostly dairy cattle. I became quite familiar with the behavior of these animals as they proceeded through the slaughter process. Even tame dairy cattle can become quite agitated in a slaughter plant. These animals are away from familiar surroundings, often for the first time in their lives, and they are often forced to move with an electric prod and they react accordingly.
18. Horses are more easily frightened than cattle. Horses can become particularly frightened, because they are historically prey animals. Consequently, based on my experience with large domestic animals, I believe that horses are uniquely unsuited to processing at a slaughter plant. It is very difficult to secure a horse's head which diminishes the effectiveness of the captive bolt. Sometimes horses have to be hit several times with the captive bolt, causing tremendous suffering before they are effectively rendered unconscious. Subsequently, it is highly probable that some horses may not be rendered unconscious when hung and bled.

Horses are also more likely to injure themselves trying to escape the runway in the slaughter plant.

19. According to USDA documents, there are numerous documented cases of inhumane slaughter of horses, ranging from improper handling to outright abuse.

As explained by a USDA inspector working at the Cavel plant in Illinois:

I observed the plant manager herding horses into the alleyway to the knock box. Nine horses were overcrowded in the alleyway causing undue excitement which was further exacerbated when two or more employees from the kill floor began yelling and hitting these horses causing the one in the end of the line to slip and fall.

Likewise, on March 13, 2005, a USDA inspector at the Cavel plant reported:

Eight horses were in the alleyway leading directly to the knock box. The employee who is routinely assigned to work on the kill floor, hanging the horses on the rails, was using a riding crop to whip the horse in the alleyway closest to the knock-box. This horse continued to move backwards, away from the knock-box causing the other horses behind it to be overcrowded. As the whipping continued the horses in the alleyway became extremely excited. I immediately told the employee to stop but he did not listen to me. During this time, the last horse in the alleyway attempted to jump over the alleyway wall and became stuck over the top of the wall. Eventually it had flailed around enough to fall over to the other side of the wall.

* * *

Meanwhile two more horses fell down in the alleyway. The first was the second horse in the line to the knock box. It had fallen forward and the horse behind it began to walk on top of it as the downed horse struggled to get up. The second horse to fall was the fourth horse in the line. It had flipped over backwards due to the overcrowding and was subsequently trapped and trampled by the fifth and sixth horse in the line in their excitement to move forward. Attached to this declaration are true and correct copies of the relevant USDA reports describing these incidents. In my professional opinion, this document illustrates the inhumane treatment of horses.

20. As companion animals, horses are not suited for this kind of inhumane treatment. An alternative for unwanted horses is euthanasia by a trained and licensed veterinarian. As with unwanted dogs and cats, the process of professional euthanasia quickly and painlessly ends the animal's life without the pain and suffering of long-distance transport, handling, and slaughter for human consumption. All equine veterinarians are capable of humanely euthanizing horses. I euthanized horses when I was a large animal practitioner, and it can be done in a quiet, safe and nonfrightening way. The horse does not struggle, is not fearful and dies a quiet and certain death.
21. Horses that eventually make their way to slaughter are taken to large horse auctions where they are purchased by “killer buyers.” Some of these horses are healthy retired or unsuccessful race horses. Others are surplus riding school and camp horses. Many were companion animals whose owners gave them up for sale. Wild horses removed from public lands also constitute a percentage of the horses sent for human consumption, as do foals from mares whose urine is collected for the production of hormone replacement therapy drugs.
22. Many of the horses slaughtered are young and healthy, because they have been raised as companion or competitive horses, and treated with all the drugs and substances with which such animals are treated.
23. Many horses who are slaughtered for human consumption are also lame, blind, starved and/or show evidence of lack of care such as saddle sores, overgrown hooves, bad teeth, and injuries. These horses thus also show signs of having been used in the companion and competitive sectors before being sold for meat.
24. In addition, there is believed to be “a thriving trade in stolen horses going to slaughter.” C.L. Stull, *Evolution of the Proposed Federal Slaughter Horse Transport Regulations*, 79 J. ANIMAL SCIENCE E12 (2001). The stolen horses presumably come from the sources identified above.
25. Transportation to a slaughter facility, especially in a multiple horse transport

vehicle, is frightening for most horses but is especially traumatic for wild horses, who resist handling during gather and transport operations. Because of their wildness, the fear they display in response to proximity to people in strange environments, and their resistance to handling and transport, wild horses experience high levels of distress and therefore the risk of injury is greater during the events leading up to slaughter.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge, and as to those matters, I believe them to be true.

Executed this 15 day of March, 2012, in Williston, Vt.

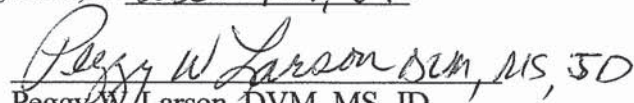

Peggy W. Larson, DVM, MS, JD

EXHIBIT 4

DECLARATION OF JOANNE PAVLIS

I, Joanne Pavlis, declare as follows:

1. I am a professional horse trainer with Milemakers, LLC of Larkspur, Colorado. I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection.

2. Milemakers LLC provides training for horses and specializes in the education, training and condition of Endurance and Pleasures Distance horses and riders. We also provide conditioning for Arabian race horses who will be used on the racetrack, a beginning program for junior riders, and coaching for trail rides.

3. I have been training horses for eighteen years and have worked as a trainer with Milemakers for the last sixteen years. In the course of my work I have seen hundreds of horses, gotten to know hundreds of their owners, and am familiar with the drugs, treatments and substances used by owners of companion horses, sporting and competitive horses, and horses destined for racing.

4. I have reviewed Exhibit A to the Petition for Rulemaking being submitted by Front Range Equine Rescue. I am familiar with virtually all the drugs, treatments and substances listed on Exhibit A.

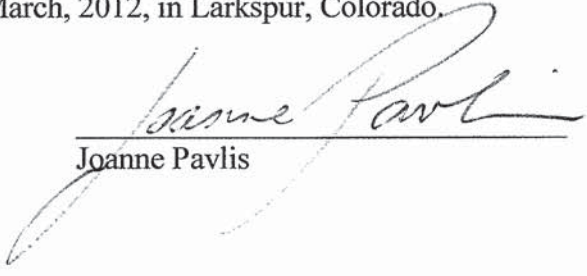
5. The drugs, treatments and substances listed on Exhibit A are all very commonly used by owners of companion horses and competition horses. Virtually all such owners would either have these drugs, treatments and substances on hand and use them on their horses, or would have access to the drugs treatments and substances, and be able to easily get them from their local veterinarian.

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6. I am also familiar with and have had experience with wild horses who have been captured and placed in holding pens. These horses are given some of the drugs, substances and treatments on Exhibit A, including many commonly-used veterinary drugs.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge and experience.

Executed this 19 day of March, 2012, in Larkspur, Colorado.



Joanne Pavlis

EXHIBIT 5

DECLARATION OF RANDY PARKER, D.V.M.

I, Randy Parker, declare as follows:

1. I am a veterinarian and own and manage Range View Equine Associates in Elbert, Colorado. I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection.

2. I am a 1989 graduate of Tufts University School of Veterinary Medicine, and have been practicing veterinary medicine for twenty-three years. After graduation from Tufts, I did an internship on Prince Edward Island, focusing on large animal, food animal and equine practice.

3. After my internship I moved to Colorado where I have been in practice ever since. My veterinary practice focuses almost exclusively (greater than ninety percent) on the care of companion horses, and horses used in competition, show and sporting events.

4. I see an average of thirty horses every week as part of my practice.

5. In the course of my practice I prescribe medications needed by the horses I treat. I also visit the barns, tack rooms, and treatment areas in which my clients' horses live, and regularly observe the kinds of drugs, substances, and treatments my clients use for their horses, whether prescribed or acquired elsewhere.

6. I have reviewed Exhibit 1 to the Petition for Rulemaking submitted by Front Range Equine Rescue. I am familiar with the large majority of the drugs, treatments and other substances on Exhibit 1, which I have either prescribed myself or seen at the barns of and in use by my clients for their horses.

7. Many of the drugs on this list are harmful to humans. For example, chloramphenicol is known to cause aplastic anemia and other problems. Nitrofurazone, which is commonly used, is a human carcinogen. Additionally, the administration of any antibiotic to horses, if those horses were then eaten, could lead to the development of antibiotic resistances in humans.

8. The majority of drugs, treatments and substances on Exhibit 1 to the Petition are regularly and routinely used by owners of horses in the areas where I work, and I believe this practice to be common throughout the country.

9. Based on my training and experience, it is my professional opinion that an alarming majority of American horses who are sent to slaughter for human consumption may have been treated with a variety of drugs, treatments and substances that renders their flesh dangerous to people who eat horse meat and makes the horses' meat unsafe for human consumption.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge and experience.

Executed this 17 day of March, 2012, in Elbert, CO

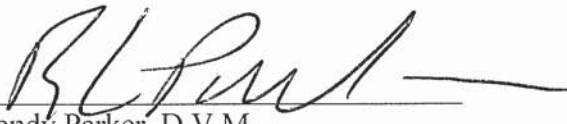

Randy Parker, D.V.M.

EXHIBIT 6

DECLARATION OF CYNTHIA NEWBERRY

I, Cynthia Newberry, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection. If called, I could and would testify to these facts in a court of law.
2. I am the owner and head trainer at Corgi Glen Farm in Beallsville, Maryland. I have over forty years of experience with horses, including extensive training and judging. I have been riding and caring for horses since I was six years old, and have shown horses nationally.
3. I am a graduate of Virginia Intermont College, where I obtained a degree in Equine Studies and Business Management, while continuing to ride on the intercollegiate riding team. I have also served as an officer with several equestrian organizations in the past ten years.
4. In my work as a trainer at Corgi Glen Farm, I deal on a regular basis with approximately thirty horses, about half of which are owned by clients and the other half by Corgi Glen Farms. I have trained approximately 100 horses over the past thirty-two years.
5. I have also been involved in the breeding of horses for over three decades.
6. With my horses and the horses I have trained and kept for clients, I have provided maintenance doses of various drugs, over the course of their lives, that keep them healthy.
7. I have reviewed the chart attached to this declaration. I am familiar with eighty per cent of the drugs listed on the chart, in connection with their use on horses both by myself and by others who I have observed over the course of the last three decades.
8. Over the course of the time I have owned horses, my veterinarians, other owners and/or I have given nearly seventy percent of the drugs on the chart to the horses I have owned, cared for, and trained.
9. Almost every item on the attached list is either commonly found in barns housing horses, and is used on those horses, or is found in catalogues and supply stores, for sale to private horse owners in America or available with a veterinarian's prescription. I am personally familiar

with and use or have used at least seventy-nine of the substances on that list, and am informed and believe that all of those substances are used regularly on American horses.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge and experience.

Executed this 28th day of January, 2013, in Maryland.

Cynthia L. Newberry
Cynthia Newberry

EXHIBIT 7

DECLARATION OF DIRK MURPHY

I, Dirk Murphy, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection. If called, I could and might testify to these facts in a court of law.
2. I am 49 years old and was raised around horses, and have raised and trained horses from my youth till present. I have observed horses in all stages of development, from birth to breeding to old age. I have worked with horses as labor animals in my cattle-raising capacity, ridden horses in the rodeo, and had them as companions.
3. I have either trained or owned an estimated 100 horses over the course of my life.
4. For the most part, I use an all natural program of medical care on my horses, and so do not use many of the drugs and medications that others may use on their horses.
5. My horses do periodically receive phenylbutazone. They also get, from time to time, banamine, furizalidone, bronco fly spray, and aspirin.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge and experience.

Executed this 28 day of January, 2013, in Kerr Co.

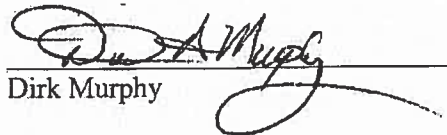

Dirk Murphy

EXHIBIT 8

DECLARATION OF HOLLY COLELLA, D.V.M.

I, Holly Colella, declare as follows:

1. I am a veterinarian and own and manage a solo mobile veterinary practice. I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection.

2. I am a 2001 graduate of Colorado State University School of Veterinary Medicine, and have been practicing veterinary medicine for twelve years. After graduation from veterinary school, I began working with a veterinary practice and have specialized in general equine medicine for my entire career. Prior to admission to veterinary school, I worked as a veterinary assistant/technician for approximately 6 years, mostly focused on the equine industry.

3. My veterinary practice focuses almost exclusively on the care of companion horses, rodeo horses, hunter-jumper competition horses, and ranch horses.

4. I see more than 100 horses per month and 1200 horses per year, and have done so throughout the course of my career, as part of my practice.

5. I have always been around horses, since I was a young girl, and have used horses for pleasure, including trail riding, during that time.

6. In the course of my practice I prescribe medications needed by the horses I treat. I also visit the barns, tack rooms, and treatment areas in which my clients' horses live, and regularly observe the kinds of drugs, substances, and treatments my clients use for their horses, whether prescribed or acquired elsewhere.

7. I have reviewed Exhibit 1 to the Petition for Rulemaking submitted by Front Range Equine Rescue. I am familiar with the large majority of the drugs, treatments and other substances on Exhibit 1, which I have either prescribed myself or seen at the barns of and in use by my clients for their horses.

8. The majority of drugs, treatments and substances on Exhibit 1 to the Petition are regularly and routinely used by owners of horses in the areas where I work, and I believe this practice to be common throughout the country.

9. Based on my training and experience, it is my professional opinion that an alarming majority of American horses who are sent to slaughter for human consumption may have been treated with a variety of drugs, treatments and substances that renders their flesh dangerous to people who eat horse meat and makes the horses' meat unsafe for human consumption.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge and experience.

Executed this 10th day of February, 2013, in Cole Springs.


Holly Cotella, D.V.M.

EXHIBIT 9

DECLARATION OF MICHELLE CONNER

I, Michelle Conner, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection. If called, I could and would testify to these facts in a court of law.

2. I have owned horses for twenty-three years, and have been training horses professionally for the last eleven years. I currently run a training and boarding facility. Through that experience, I have come to learn about the drugs, medications and treatments that the owners of American horses give to their horses.

3. From 2002 through 2007 I worked closely with the Bureau of Land Management, working with foals who were between six and eighteen months of age, and trying to prepare them to make them more adoptable. In the course of that work, each of the foals was injected with a number of vaccines and dewormed with products that are found on the list attached to this declaration.

4. I have also been regularly involved with local horse shows and with 4-H Clubs using horses and so I am very familiar with the drugs and medications given to companion and show horses.

5. I have reviewed the chart attached to this declaration. I am familiar with most of the drugs listed on the chart, in connection with their use on horses both by myself and by others who I have observed over the course of the last three decades.

6. Over the course of the time I have owned horses, my veterinarians, other owners and/or I have given more than eighty percent of the drugs on the chart to the horses I have owned, cared for, and trained.

7. Almost every item on the attached list is either commonly found in barns housing horses, and is used on those horses, or is found in catalogues and supply stores, for sale to private horse owners in America or available with a veterinarian's prescription. I am personally familiar

with and use or have used at least eighty percent of the substances on that list, and am informed and believe that all of those substances are used regularly on American horses.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge and experience.

Executed this 15 day of January, 2013, in Calhan, CO.



Michelle Conner

SF320527076.1

EXHIBIT 10

DECLARATION OF RONALD T. FITCH

I, Ronald T. Fitch, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection. If called, I could and would testify to these facts in a court of law.
2. I am a Health Environment and Safety Engineer for Chevron, where I ensure the safety and proper conditions for thousands of workers.
3. I have been involved with the rescue and rehabilitation of horses in need for approximately two decades. I am the author of the book Straight From the Horse's Heart, and I also provide a daily web-based educational forum that thousands of people rely on daily, disseminating information about issues related to the welfare and preservation of American horses. In that blog I address wild horses, domestic horses, horse racing, and horse slaughter.
4. I have been a foster or adoptive parent for horses for nearly two decades. In those roles, I consult with veterinarians who help me decide what medications the horses under my care should and do receive.
5. As part of my work with the horses I have rescued, fostered and adopted, I have become a student of horse nutrition and medication, and have learned much about these issues from a local veterinarian.
6. I have reviewed the chart attached to this declaration. I am familiar with most of the drugs listed on the chart, in connection with their use on horses both by myself and by others who I have observed over the course of the last three decades.
7. Over the course of the time I have owned horses, my veterinarians, other owners and/or I have given more than eighty percent of the drugs on the chart to the horses I have owned, cared for, and trained.
8. Almost every item on the attached list is either commonly found in barns housing horses, and is used on those horses, or is found in catalogues and supply stores, for sale to private

horse owners in America or available with a veterinarian's prescription. I am personally familiar with and use or have used at least sixty percent of the substances on that list, and am informed and believe that all of those substances are used regularly on American horses.

9. Every item on the attached list is either commonly found in barns housing horses, and is used on those horses, or is found in catalogues and supply stores, for sale to private horse owners in America or available with a veterinarian's prescription. I am personally familiar with and use or have used at least sixty percent of the substances on that list, and am informed and believe that all of those substances are used regularly on companion, pleasure and recreation, and competition/show horses.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge and experience.

Executed this 16th day of January, 2013, in Mesquite, Tx.


Ronald T. Fitch

EXHIBIT 11

DECLARATION OF SANDRA GROVER, D.V.M.

I, Sandra Grover, declare as follows:

1. I am a veterinarian and own and manage Exclusive Equine Dentistry and Chiropractic in Black Forest, Colorado. I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection.
2. I am a 1999 graduate of Colorado State University School of Veterinary Medicine, and have been practicing veterinary medicine since my graduation.
3. My practice has always included a significant percentage of horses, and in the last seven years over ninety percent of my practice has involved the treatment of equines.
4. I see approximately thirty to forty horses each week in my practice, for an average of 1500 visits per year.
5. I have worked with and around horses all my life, and have been extensively involved in showing horses since I was a teenager.
6. In the course of my practice I prescribe medications needed by the horses I treat. I also visit the barns, tack rooms, and treatment areas in which my clients' horses live, and regularly observe the kinds of drugs, substances, and treatments my clients use for their horses, whether prescribed or acquired elsewhere.
7. I have reviewed Exhibit 1 to the Petition for Rulemaking submitted by Front Range Equine Rescue. I am familiar with the large majority of the drugs, treatments and other substances on Exhibit 1, which I have either prescribed myself or seen at the barns of and in use by my clients for their horses.
8. Many of the drugs on this list are harmful to humans.
9. The majority of drugs, treatments and substances on Exhibit 1 to the Petition are regularly and routinely used by owners of horses in the areas where I work, and I believe this practice to be common throughout the country.

10. Based on my training and experience, it is my professional opinion that an alarming majority of American horses who are sent to slaughter for human consumption may have been treated with a variety of drugs, treatments and substances that renders their flesh dangerous to people who eat horse meat and makes the horses' meat unsafe for human consumption.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge and experience.

Executed this 25 day of January 2013, in Elbert, CO.

Sandra Grover, DVM
Sandra Grover, D.V.M.

EXHIBIT 12

DECLARATION OF GAIL VACCA

I, Gail Vacca, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection. If called, I could and would testify to these facts in a court of law.
2. I have been a licensed trainer of horses for competition and shows since 1984. I have an extensive background in the horse racing industry, as further established below. I am also intimately aware of the way in which racehorses are treated, on and off the racetrack.
3. I am currently the President of the Illinois Equine Humane Center ("ILEHC"), a 501(c)(3) nonprofit organization that provides humane treatment and shelter while working as a clearinghouse to seek adoptive homes for Illinois' unwanted equines, and also provides public education to raise awareness about responsible equine ownership so that less horses end up in crisis. ILEHC has been involved with the rescue of hundreds of horses on their way to slaughter over the years, and ninety per cent of those horses were former racehorses.
4. I became a professional horsewoman almost thirty years ago. I have been a nationally licensed thoroughbred trainer, and have been involved with top level show horses, in both the hunter and jumper categories. I am also a licensed owner of racehorses.
5. I was actively involved in the horseracing industry, as a trainer and owner of horses, from the 1980s until 2002, after which I focused my efforts on rescue and rehabilitation of equine welfare issues. As a trainer I was at the track every day, working long hours. I worked with an average of ten horses at a time, and provided therapies and treatments and medications to the horses. I was also familiar with the practices of other trainers at the track, and so am fully aware of the kinds of substances, drugs and treatments most racehorses receive.
6. In the 1980s, trainers used phenylbutazone indiscriminately, and there was no restriction on the amount of phenylbutazone they administered or that the horses received. There

are more significant restrictions on the use of phenylbutazone now, but it is still frequently used on racehorses.

7. Based on my personal observation, racehorses involved in the breeding process, while they are in production, are given large amounts of hormones and antibiotics and anti-inflammatory drugs. These drugs are used to treat the normal medical and metabolic consequences and sequelae of multiple inseminations, pregnancies, and births.

8. From personal experience and observation, I know that many racehorses go from the racetrack to "kill buyers" who sell them for slaughter. These include horses who are injured in a race or are no longer top performers.

9. I was directly involved in a television production for a piece on Real Sports with Bryant Gumbel, which accurately portrayed the path of many racehorses to slaughter for food production.

10. I have been visiting auctions where horses are being sold for slaughter for approximately thirty years. Based on the information I have obtained in connection with that extensive experience, as well as with the television production and my professional career, I am informed and believe that approximately ten to fifteen percent of American horses that go to slaughter are former racehorses. I am informed and believe that more than 20,000 American racehorses go to slaughter each year.

11. When I have observed the pens at auctions of horses heading to slaughter, there are always thoroughbreds seen in virtually every pen.

12. I have reviewed the chart attached to this declaration. I am familiar with the vast majority of the drugs listed on the chart, in connection with their use on horses both by myself and by others who I have observed over the course of the last three decades.

13. Over the course of the time I have owned horses, my veterinarians and/or I have given most of the drugs on the chart to the horses I have owned, cared for, and trained.

14. Every item on the attached chart is either commonly found in racetrack and racehorse barns and other barns housing horses, and is used on those horses, or is found in

catalogues and supply stores, for sale to private horse owners in America or available with a veterinarian's prescription. I am personally familiar with and use or have used at least 98 of the substances on that list, and am informed and believe that all of those substances are used regularly on racehorses, companion, pleasure and recreation, and competition/show horses.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge and experience.

Executed this 16th day of January, 2013, in Plano, IL


Gail Vacca

EXHIBIT 13

DECLARATION OF SHIRLEY S. HOFFMAN

I, Shirley S. Hoffman, declare as follows:

1. I am the owner of HiView Acres of Longmont, Colorado, and also the founder of Horses Forever, a 501(c)(3) nonprofit corporation of Colorado, dedicated to the rescue of horses in need. The facts set forth are true to the best of my knowledge and recollection. If called, I could and would testify to these facts in a court of law.

2. I have been a horse owner for over thirty years, and have been actively involved in the breeding and showing of American Saddlebred Horses.

3. I have had as many as 100 horses at a time when I was involved in breeding and showing horses. I currently have approximately thirty horses.

4. The horses that Horses Forever rescues come from a variety of sources, including victims of animal cruelty cases and discarded horses from the horse training and competition industry.

5. I was involved in owning and showing American Saddlebred Horses in the 1980s and 1990s. The American Saddlebred Registry is the oldest horse registry in the United States and the breed is popular in the horse show world as well as the world of equine versatility. I was an active participant in shows and competitions involving American Saddlebred horses until the 1990s, when I discovered, from the inside, that trainers were giving these horses many types of prohibited drugs, including acepromazine and phenylbutazone.

6. I started the Rocky Mountain Horse Expo, a well-known equine educational event under the auspices of the Colorado Horse Council, a horse industry group.

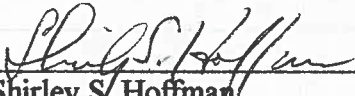
7. I have been involved with hundreds of horses over the course of my experience with the show world and the rescue group. I am very familiar with the medications and other drugs given to horses in the performance and private sectors.

8. I have reviewed Exhibit 1 to the Petition for Rulemaking submitted by Front Range Equine Rescue, and have consulted with the veterinarian who cares for my horses. Almost all of

the drugs on the list, which I understand federal law states are not to be used in horses "intended for food," were or are given to some of my horses. Several of the drugs on the list, which I understand federal law states are not to be used in horses "intended for food," were or are given to 90 per cent or more of my horses, and I understand that usage to be common among other horse owners.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge and experience.

Executed this 17th day of January, 2013, in Boulder County, Colorado



Shirley S. Hoffman

SP33052897.1

EXHIBIT 14

DECLARATION OF KEITH DANE

I, Keith Dane, declare as follows:

1. I am Director, Equine Protection, with The Humane Society of the United States ("HSUS"). I have personal knowledge of the facts set forth in this declaration.

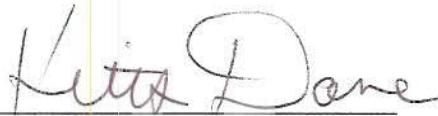
2. The HSUS is a non-profit organization that promotes the protection of all animals. The HSUS maintains its headquarters in Washington, DC and is the largest animal protection organization in the United States, with more than eleven million members and constituents.

3. The HSUS actively advocates against practices that injure or abuse horses and opposes the slaughter of horses for human consumption.

4. The HSUS has been actively involved in litigation and the support of legislation directed at the prohibition of horse slaughter and the transport of horses for slaughter. Furthermore, The HSUS offers information regarding the inhumane treatment of animals on a wide spectrum of topics, including the process of slaughtering horses for their meat.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge and experience.

Executed this 5th day of April, 2012, in Gaithersburg, MD.



KEITH DANE

EXHIBIT 15

DECLARATION OF MICHAEL GREGER, M.D.

I, Michael Greger, declare as follows:

1. I serve as the Director of Public Health and Animal Agriculture for the Humane Society of the United States ("HSUS"). I have held this position since 2005. I have lectured internationally, and have presented at the Conference on World Affairs, the National Institutes of Health, and the International Bird Flu Summit. I have an M.D. degree from the Tufts University School of Medicine. For more information regarding my credentials, see my *curriculum vitae*, which is attached to this declaration as Exhibit 1. I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection. If called, I could and would testify to these facts in a court of law.

2. I have reviewed Exhibit 1 to the Petition for Rulemaking prepared by Front Range Equine Rescue and The Humane Society of the United States, as well as the declarations of Hilary Wood, Joanne Pavlis, Randy Parker and Peggy Larson, D.V.M. being submitted in support of the Petition. I understand from the declarations that most, if not all, of the drugs, treatments and substances listed on Exhibit 1 are routinely, and without adequate control, given to American horses who may end up as horse meat for human consumption. Exhibit 1 also accurately describes many of the adverse reactions and side effects of the drugs and substances listed there.

3. The substances listed on Exhibit 1, if ingested by humans, present a variety of potential health problems and adverse reactions, which can range from benign to fatal. While some of the substances are approved for use in humans, none of them are approved for use in humans who are not aware they are ingesting the substances. It is a matter of common sense and standard medical practice not to give drugs to individuals who are unaware they are receiving the drugs. Yet that is exactly what would be happening if horse meat that is eaten by humans contains residue of any of the substances listed on Exhibit 1.

4. It is a foundational medical treatment principle that patients are not given any drugs without first ascertaining if the patients are taking any other drugs at the time. A patient's current

drug and medication regime is important because it may limit the type of drugs that may be recommended or prescribed, based on the negative or potentiating reactions between drugs that may occur. Adverse drug reactions between different medications can be extremely severe and must be avoided to the extent possible.

5. It is also a foundational medical principle that patients must be asked about their prior experience with medications before prescribing or recommending new drugs for treatment. Taking such a history from a patient is vital, in order to determine if they may have allergies to certain specific drugs or groups of drugs. Patients may have known allergies to certain drugs, which can cause severe reactions, including anaphylactic shock or even death.

6. If drug residues in horses are unknown, individuals consuming horse meat will be unaware of what drugs and substances they may be eating. If consumers have drug allergies, there is a potential for individuals who eat horse meat to have serious negative reactions if any of the drugs that remain in horse meat that they eat are drugs to which they are allergic. There is the potential for an allergic reaction, made even worse because the consumer will not know that they have taken any drugs. Unless all horses are tested for all potential dangerous drug residues, and unless it can be guaranteed that horse meat comes only from horses who have never had any potentially dangerous substances to which humans are known to develop allergies, there is no way to eliminate the potential for such an adverse, and potentially severe, reaction. Additionally, since there is no way of filtering the consuming population to avoid adverse reactions, and no way to identify meat from animals who have had specific substances, the fact that a drug may be safe for some humans does not assure its safety for the consuming public or the market.

7. It is also a foundational medical principle that patients must be asked about their past family and personal medical history, and current medical conditions, before prescribing most drugs, in order to determine if the patients may have sensitivities to certain specific drugs. Patients may have particular genetic predispositions, or current illnesses or diseases, that preclude or limit the use of certain drugs. (For example, individuals with bleeding disorders are generally restricted

from their intake of drugs that may act as blood thinning agents, and must exercise extreme caution if they do take such drugs.)

8. If drug residues in horses are unknown, individuals consuming horse meat will be unaware of what drugs and substances they may be eating. If any of those drug residues would be contraindicated for use by the consumer because of sensitivities they have to certain drugs, based on genetic disposition, temporary conditions, or current illnesses, there is a potential for individuals who eat horse meat to have serious negative impacts. Unless all horses are tested for all potential dangerous drug residues, and unless it can be guaranteed that horse meat comes only from horses who have never had any potentially dangerous substances, there is no way to avoid the potential for such a negative reaction. Additionally, since there is no way of filtering the consuming population to avoid adverse reactions, and no way to identify meat from animals who have had specific substances, the fact that a drug may be safe for some humans does not assure its safety for the consuming public or the market.

9. It is a matter of undisputed medical science that pregnant and nursing women are strongly cautioned to avoid many drugs, including some listed on Exhibit 1, which could have harmful effects on their fetus or nursing babies. If drug residues in horses are unknown, there is a chance that such drugs could exist in horse meat, and there is a potential for pregnant and nursing women who eat horse meat to have serious negative impacts on their unborn, or nursing babies. Unless all horses are tested for all potential dangerous drug residues, and unless it can be guaranteed that horse meat comes only from horses who have never had any drugs or substances that would be dangerous for pregnant or nursing women, there is no way to avoid the potential for such a negative reaction.

10. The use of steroids by humans should be very carefully monitored and controlled, overseen by a physician. Steroids can have significant detrimental effect on a number of body systems. Exhibit 1 contains a number of steroids that, if taken by humans, would affect humans in many ways, including notable effects on human reproductive systems and sexual hormone production. Steroids such as prednisone and methylprednisolone, which are both on Exhibit 1 and

given to horses, should only be used under the careful monitoring and recommendation of a physician, and have a long list of potential negative, and serious, side effects.

11. I understand from the declarations of Hilary Wood, Joanne Pavlis, Randy Parker and Peggy Larson that many antibiotics, such as those listed on Exhibit 1, are given to American horses. The unknown and unmonitored use of antibiotics in horses that may be eaten creates the potential for adverse effects on the humans who eat those horses. Because of the dosing of horses with antibiotics, unknown amounts of antibiotics and antibiotic residue may be ingested by humans. This is problematic, and potentially harmful, for two reasons. First, it is a generally-accepted scientific principle that the use of antibiotics in food-producing animals leads to the growth of antibiotic-resistant pathogens, which negatively affect tens of thousands of Americans each year. Second, it is standard medical practice that humans should only take antibiotics when necessary and indicated, in order to prevent the development of new antibiotic-resistant bacteria. Inappropriate use of antibiotics, including use when no such treatment is indicated, leads to drug-resistant bacteria. *See*

<http://www.niaid.nih.gov/topics/antimicrobialResistance/Understanding/Pages/causes.aspx>.

12. If drug residues in horses are unknown, there is a potential for individuals who eat horse meat to ingest antibiotics that they do not need, and to be exposed to or develop antibiotic-resistant bacteria which could potentially lead to severe illnesses that could not be treated with standard antibiotic therapy. Unless all horses are tested for all potential antibiotic residues, and unless it can be guaranteed that horse meat comes only from horses who do not have significant antibiotic residues and have not developed antibiotic-resistant strains of bacteria, there is no way to avoid the potential for a significant adverse effect on human health.

13. I am informed and believe that many of the drugs and other substances on Exhibit 1 have never been tested on humans, and that no studies have determined the potential health risks and dangers associated with ingestion of those drugs and substances. It is a strong ethical and medical principle that unsuspecting humans should not be treated as random experimental subjects and be indiscriminately given drugs and other substances that they are unaware they are taking.

14. With respect to the drugs and other substances given to horses who become meat, there is a very real potential for danger to humans who eat that meat, because of the lack of any information about the consequences of ingesting those substances, or the nature of the residue or metabolites of those substances. If drug residues in horses are unknown, there is a potential for individuals who eat horse meat to have serious negative impacts from ingestion of drugs and substances that have never been tested on humans and that they do not even know they are taking. Unless all horses are tested for all potential dangerous drug residues, and unless it can be guaranteed that horse meat comes only from horses who have never had any potentially dangerous substances, there is no way to avoid the potential for such a negative reaction.

15. Many of the drugs and substances listed on Exhibit 1 are known to be harmful to, and unsafe for, humans to ingest. If drug residues in horses contain substances that are known to be harmful or unsafe for human consumption, there is a potential for individuals who eat horse meat to have serious negative impacts from ingestion of that meat. Unless all horses are tested for all potential dangerous drug residues, and unless it can be guaranteed that horse meat comes only from horses who have never had any potentially dangerous substances or do not have any drug residues from of any drugs or substances known to be harmful to humans, there is no way to avoid the potential for such a negative reaction.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge and experience.

Executed this 19 day of March, 2012, in Madrid, Spain.



Michael Greger, M.D.

MICHAEL GREGER, M.D.

2100 L St., N.W.
Washington, DC 20037
Direct line: (202) 676-2361
Fax: (202) 676-2372
mhgl@cornell.edu
DrGreger.org

EDUCATION:

- M.D. – Tufts University School of Medicine; Boston, MA; May 1999 with honors
- B.S. Biology – Cornell University College of Agriculture; Ithaca, NY; May 1995

LICENSURE:

- Maryland Board of Registration in Medicine license #D0064571 (active)
- Massachusetts Board of Registration in Medicine license #206106 (inactive)

POSITIONS:

- *Director*. Public Health and Animal Agriculture, Humane Society International (since 2009)
- *Director*. Public Health and Animal Agriculture, The Humane Society of the United States (since 2005)
- *Guest Lecturer*. Cornell University Department of Nutrition (Fall 2004)
- *Public Speaker*. Speaking schedule posted at <http://www.DrGreger.org/dates.html> (since 2002)
- *Coordinator--Infectious Disease*. Organic Consumers Association; Marais, MN (2001-2005)
- *Chief Medical Investigator*. Farm Sanctuary; Watkins Glen, NY (1993-2005)

SELECTED PUBLICATIONS:

- Greger M. 2012. The Welfare of Transgenic Farm Animals. In *Biotechnology - Molecular Studies and Novel Applications for Improved Quality of Human Life*. InTech, 2012.
- Greger M. 2010. Transgenesis in animal agriculture and zoonotic disease resistance. *Centre for Agriculture and Biosciences (CAB) Reviews* 6(41):1-6.
- Greger M. 2010. Transgenesis in Animal Agriculture: Addressing Animal Health and Welfare Concerns. *Journal of Agricultural and Environmental Ethics*. DOI: 10.1007/s10806-010-9261-7.
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- Greger M. *Carbophobia* (New York City: Lantern Books, 2005).

EXHIBIT 16



Pasture to Plate:
The True Cost of Canada's Horsemeat Industry
A Report by the Canadian Horse Defence Coalition on Equine Slaughter
at
Les Viandes de la Petite-Nation Inc. / Le Cerf de Boileau
St-André-Avellin, Quebec
July 13 & 14, 2011

Canadian Horse Defence Coalition
150 First Street
P.O. Box 21079
Orangeville, Ontario L9W 4S7
Phone: (250) 768-4803
Email: info@defendhorsescanada.org
Web: www.defendhorsescanada.org

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Cover Image: Horse 19 from Day 2 in stun box at Les Viandes de la Petite-Nation Inc.
St-André-Avellin, Quebec

EXECUTIVE SUMMARY

Les Viandes de la Petite-Nation Inc. is a private meat processing company that slaughters a variety of species, including horses. In 2010, the company received a \$2.0 million infusion from the federal government to help with upgrades to its meat processing facility: http://www.meatradenewsdaily.co.uk/news/061010/canada_more_government_meat_investment.aspx.

Further, in March 2011, a repayable loan of \$2.0 million was granted by Agriculture and Agri-Food Canada for the purpose of improving and modernizing slaughter operations and enhancing slaughter capacity in the plant: <http://www4.agr.gc.ca/AAFC-AAC/display-afficher.do?id=1306532429398&lang=eng>.

The CHDC was provided with full footage from two days and numerous photos taken by an anonymous source at Les Viandes de la Petite-Nation on July 13 and 14, 2011.

Les Viandes de la Petite-Nation differs from other horse slaughterhouses from which we have received slaughter footage (Natural Valley Farms/Natural Meat Company, Bouvry Exports and Viande Richelieu) in that some of the workers, and the shooter in particular, seem to have been provided with training on horse behaviour (the man possibly whipping horses into the kill line, however, was an exception, as he could frequently be heard yelling at and whipping the horses down the kill line).

Regarding the improved handling practices, an article in Alberta Farm Express dated September 26, 2010 entitled “*Que. multi-species meat plant gets loan for renos*”, stated:

“The company notes its three-year-old plant includes the ‘most modern’ animal handling systems in Canada, designed by the U.S. livestock handling expert Temple Grandin.” “‘Total respect and consideration are given to the animals in order to minimize stress,’ the company states on its website.”: <http://www.albertafarmexpress.ca/news/que-multi-species-meat-plant-gets-loan-for-renos/1000386850/>



This photo shows overcrowded horses in the holding pens at Les Viandes de la Petite-Nation with the trademark Temple Grandin designed walkway for cattle to the left.

While the shooter sometimes made an effort to calm the frantic horses in the stun box, the vast majority continued to be terrified. These attempts to calm the horses did not help to ensure a humane death. **In fact, Les Viandes de la Petite-Nation has the highest failure to stun rate of all the plants we have audited.**

On Day 1, fully 59% of the horses had to be shot more than once (with one horse receiving up to 11 shots). An additional 10% *should have* been afforded at least a second shot, but were not.

On Day 2, 28% were shot more than once, with an additional 7 requiring a second shot, but never receiving it (even though the shooter may have felt that additional shots were required, and attempted to do so, but it appeared that the captive bolt pistol jammed).

This is a clear indication that good management cannot compensate for the many factors that contribute to making horse slaughter in an assembly-line manner inherently inhumane.

Canada's Meat Inspection Act - PART III (Appendix A) states:

Examination, Inspection, Humane Treatment and Slaughter, Packaging and Labeling

79. Every food animal that is slaughtered shall, before being bled,

(a) be rendered unconscious in a manner that ensures that it does not regain consciousness before death, by one of the following methods:

(i) by delivering a blow to the head by means of a penetrating or non-penetrating mechanical device in a manner that causes immediate loss of consciousness,

<http://laws-lois.justice.gc.ca/eng/regulations/SOR-90-288/page-20.html>

As for government oversight, even after the Canadian Horse Defence Coalition (CHDC) had exposed 3 other horse slaughterhouses and the many significant welfare problems within them, the Canadian Food Inspection Agency (CFIA) officials were again conspicuously absent at La Petite-Nation.

In some 20 hours of footage over a span of 2 days, just one inspector or veterinarian (white hard hat, blue smock and stethoscope worn around neck) appeared at the stun box, overseeing the stunning of 3 to 5 horses for a total of only 3½ minutes. He was present for just 1 minute, 11 seconds on Day 2, but no horse was in the stun box at the time.

It is also very likely that a number of horses revived on the suspending line, given that a blood-covered captive bolt pistol was carried in from the suspending/butchering area to the stun box area to be hosed off. The amount of blood on the pistol leads us and our veterinarian auditor to believe that it must have been used on horses that were already bleeding out from the shots applied in the stun box. This would give the plant an **Automatic Fail** - the same rating Natural Valley Farms/Natural Meat Company (now defunct), Bouvry Exports and Viande Richelieu all received.

The sheer terror of the horses was evident in the number of individual animals who whinnied, slipped, and fell in the stun box (including those who even whinnied after receiving one or more shots: Horses 41 and 54 on Day 2). This would also give the plant a **fail** rating on the slaughter audit standards.

The poor design of the stun box with its plastic curtain separating it from the suspending/butchering area added to the horses' fear. Many horses parted the curtain with their noses to stare into the suspending/butchering area. One horse stared into the butchering area for over 20 seconds and a number of horses were shot *while* staring into the area, thus resulting in an incorrect angle for the shot.

While the shooter appeared to be diligent in hosing the front of the stun box where he could see blood and brain matter, not once was the stun box hosed thoroughly on the inside, where the majority of matter accumulated. As soon as a horse entered the stun box they were met with dripping blood, brain matter and excrement from those who went before them.

In addition, the time between horses entering the stun box after the horse before them was alarmingly short, with an average of less than 3 minutes (see tables beginning on page 21).

Adding further stress to the horses, but which seems to be common practice in slaughter plants, was they were not provided with hay or water in the overnight holding pens. Many of these horses were thin and dehydrated, and some in a weakened state. From the Equine Information Documents (EIDs) photographed, we know that many of the horses came from the U.S., from States as far away as Tennessee. EID evidence indicates the horses were purchased at Sugarcreek, Ohio; Shipshewana, Indiana; and Ontario Livestock Exchange (OLEX) horse auctions.

One horse on the night of the walk-through, as seen in the evidence provided, appeared sick, diseased or injured and was lying down, putting him at risk of being trampled by the others. If this horse was in this condition upon arrival, the CFIA officials and/or workers at the plant should have segregated or euthanized him, as humane slaughter regulations require.

Since January 2010, it is mandatory for all operators of CFIA inspected facilities in Canada engaged in equine slaughter for edible purposes to have complete identity and medical records for all animals (domestic and imported) presented for slaughter. These records are referred to as Equine Information Documents (EIDs).

CFIA Manual of Procedures, Chapter 17, Annex E sections include: EID Elements; List of Veterinary Drugs Not Permitted for Use in Equines Slaughtered for Food; List of "Essential Veterinary Drugs Permitted in Equines with a 6-Month Withdraw Period", and other sections of information meant to inform how the CFIA intends to meet European Commission requirements for horsemeat exports (Appendix B):

<http://www.inspection.gc.ca/english/fssa/meavia/man/ch17/annexee.shtml>

The EID forms at La Petite-Nation uniformly denied any drugs given to the horses, including animals as old as 30 years who had clearly not been with the same owner for the extent of their lives. It is a well-known fact that aged horses may exchange hands numerous times. Also, there is a possibility that the required 6-month quarantine time for some horses would contribute to sick equines becoming sicker and more infectious. This was evidenced in the footage, as 6 horses appeared to have serious eye infections that went untreated.

Upon our review, the 63 EIDs examined received a complete **fail grade**. All have some form of omission, ranging from incomplete owners' or agents' information to the disturbing discovery of some horses whose descriptions do not match their pictures. From a food traceability standpoint, we found these results alarming.

After reviewing all the EIDs it is apparent that some auction houses are helping to complete the documents on behalf of some owners or agents. Consistent statements such as "Drug-free Six Months" in the same hand writing, and the same red pen colour, are written across the top.

In the case of one Agent, a stamp is repeatedly used. The use of a stamp to fill in a government mandated document for the purposes of food safety, at the very least, sets a frightening precedent. The government's directive is "Signature of Agent" not "Signature of Agent or a reasonable facsimile".

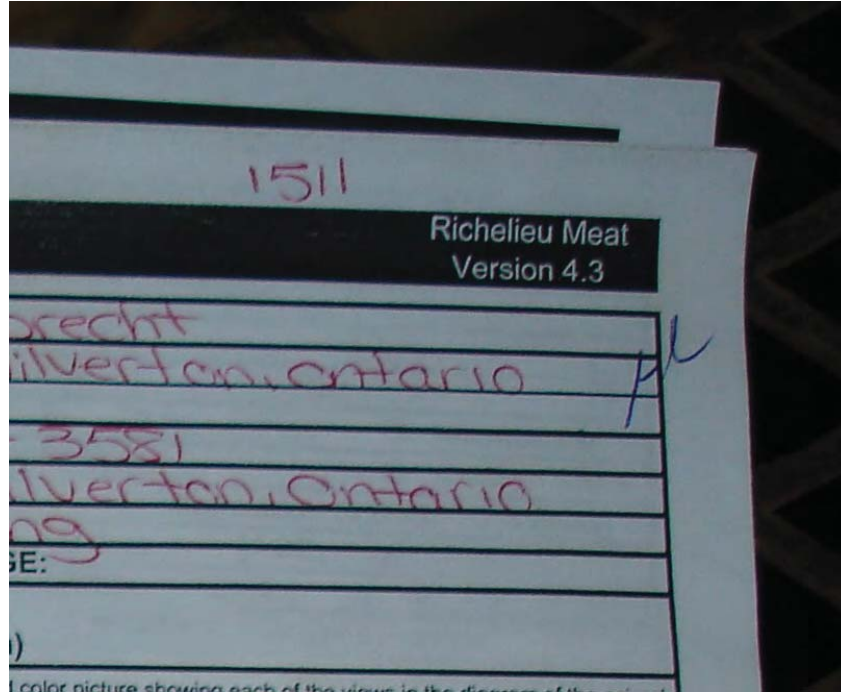
The sloppiness and inaccuracy in how these EIDs are filled out, and the nonchalance in how they are accepted by slaughterhouses that are federally sanctioned in Canada to examine and oversee them, is appalling.

The EID should be treated as a stand-alone document for traceability records; all information relating to that horse should be detailed on them and should be legible, complete and correct. All pictures should be clear and securely attached. None of this has been done in the sampling we've investigated.

Also noted on the EID form is a declaration that the owner signs stating: "I always treated the animal with respect and care to meet the needs." The reality for some horses can be quite different from this statement, such as this mare, Horse # 31.



We note that some EIDs are pre-printed with the name “Richelieu Meat” in the top right corner. Since this government-based form carries an industry header, one could be led to believe that the CFIA and the slaughter industry are actually quite closely aligned. Also, this form is being used at La Petite-Nation, not Richelieu Meats.



Of interest is the fact that the European Commission (EC), seriously concerned about the potential presence of phenylbutazone in horsemeat, is not permitting horses over the age of 6 months to enter the food chain.

The Irish Veterinary Journal, Volume 63, Number 12:

http://www.veterinaryirelandjournal.com/Links/PDFs/CE-Large/CELA_Dec_2010.pdf.pdf

states: “The legislation is now in place (EU Commission Reg. No 504/2008), stating that all horses in Europe must have an equine passport. The legislation goes further to state that any passport issued to an equine over six months of age will automatically be excluded from the food chain.”

In view of these and other stringent regulations on European soil, the CHDC questions why the EC places its consumers at risk by allowing potentially tainted horse meat from Canada to end up on dinner plates in Europe.

As this report clearly proves, Canada has a faulty EID system that invites fraud and permits horses of any age to enter the slaughter pipeline, which confirms that the EID system is far from a guarantee that food safety is being addressed.

The evidence also clearly shows that it is impossible, even in a modern designed facility, to humanely slaughter horses in an assembly-line manner.

The CHDC has previously been in receipt of footage from 3 Canadian slaughterhouses killing horses. The previous 3 were from the 2010 investigations of Bouvry Exports and Viande Richelieu, as well as the 2008 investigation of Natural Valley Farms/Natural Meat Company.

After those investigations were released publicly, and despite reassurances from the CFIA and industry that conditions would be improved, this recent investigation demonstrates that a fourth Canadian slaughterhouse is again in violation of humane slaughter regulations.

Based on the evidence and audit failure rating, the CHDC calls on the CFIA and the Canadian government to immediately close Les Viandes de la Petite-Nation slaughter plant and adopt Bill C-322, an Act which will ban the slaughter of horses as well as the importing and exporting of horses to slaughter in Canada:

<http://www.parl.gc.ca/HousePublications/Publication.aspx?Language=E&Mode=1&DocId=5159966&File=24>.

We conclude that horse slaughter must be ended in Canada and all equine slaughterhouses closed.

INVESTIGATION FINDINGS

The CHDC was provided with footage and photos taken by an anonymous source at Les Viandes de la Petite-Nation on July 13 and 14, 2011. The raw images and footage can be made available for review.

Fear Inducing Environment - Noise

Noise levels are high in the plant from the machinery, compressors and saws. As horses rely on sound as their second most important sense, this is very likely distressing for them. It also seems likely that the noise presents both a risk to the workers' hearing and poses a hazard to being able to hear important messages between workers.

It has also been shown that the body's reaction to noise is similar to its response when under stress. Blood pressure and heart rates can increase and hormone and blood cholesterol levels can change. Exposure to too much noise can make a person feel tired, posing an additional safety hazard to both the workers and horses.

Horses' Response

The horses appeared fearful in this environment and vocalizing was present. Vocalizing was prevalent throughout both days but more frequent on Day 2. Many horses whinnied multiple times, some even after being shot (Horses 41 and 54 on Day 2). 10% and 17% of the horses vocalized over the 2 days respectively, earning the plant a **fail** on the American Meat Institute's humane audit standards (designed by Dr. Temple Grandin).

Also, a common behaviour for the horses in the stun box was extreme shaking from fear. Twitching and flinching was also common. Instances of slipping and losing their footing were also seen.

As each day progressed and the stun box became more covered in blood, the horses became more resistant to enter it, so had to be forced from behind with the use of what appeared to be a whip (footage shows a whip as the primary driving tool with plastic paddles also used in the stun box).

Lack of Food and Water in Holding Pens

The lack of basic provisions such as food and water are illegal according to the *Meat Inspection Act*. Given the dehydrated and thin state of many of the horses, as well as the long duration of their transport, the provision of water is a requirement. EIDs show the majority of horses came from U.S. States as far away as Indiana, Pennsylvania, Ohio, New York, Michigan, West Virginia and Tennessee. Not providing water at the slaughter plant shows a total disregard for the welfare of these already stressed and suffering horses.

Condition of the Horses

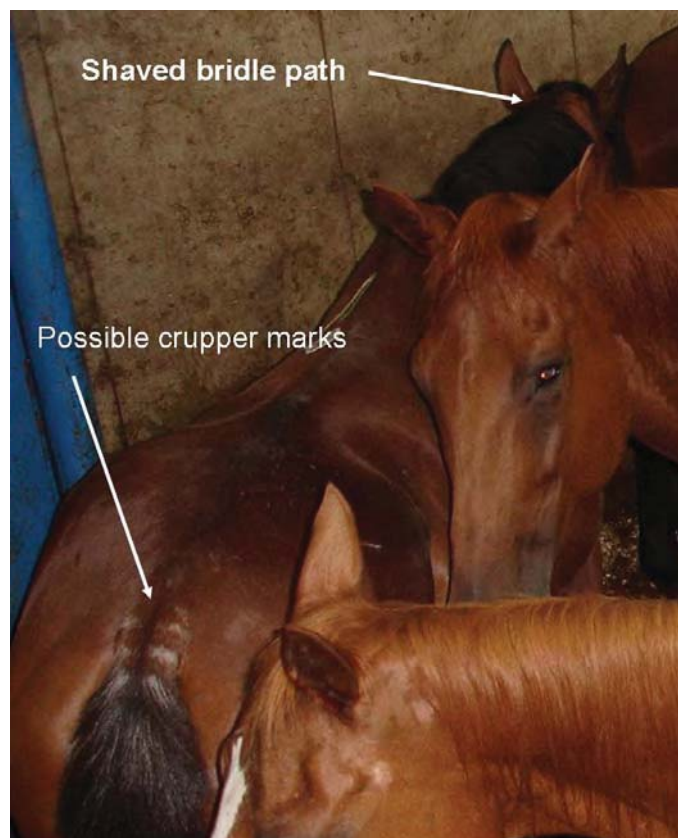
At least 6 horses appeared to have some form of eye injury or infection in the slaughter footage. One horse appeared to have a large tumour in his/her left eye (Horse 29 - Day 2. See photo in Footage Index).

Many of the horses seen during the walk-through photos of the plant were very thin and likely dehydrated (Appendix E). Photos of other horses attached to EID forms also show thin horses (Appendix F).

Several horses in the holding pens appeared to be Thoroughbreds. One very thin chestnut with tag # 9382 (pictured below) had saddle pad sweat marks on his back, indicating that he had been ridden (perhaps even raced) shortly before shipping to slaughter.



Another, seen in the next image, had what appeared to be rub marks from an ill-fitting harness crupper. This horse also had a shaved bridle path, which is very common in Standardbreds to keep the “check rein” from tangling in the mane.



Some of the horses in the slaughter footage were slick with sweat or had dried sweat marks, indicating a high level of stress or that the holding area was not temperature controlled.

One horse documented during the walk-through appeared too sick, diseased or injured to stand. If this was the condition of the horse when it arrived, he or she should have been euthanized or segregated as is required by the CFIA:

<http://www.inspection.gc.ca/english/animal/trans/transpoe.shtml>.

Some of the horses documented during the walk-through and in the slaughter footage also had additional USDA kill-only and auction stickers on them. One horse had 4 stickers indicating that he or she was likely put through the trauma of multiple auctions and multiple transports.

A total of 104 horses and mules were slaughtered on Day 1. A further 60 were slaughtered on Day 2.

A large number of horses were "light boned" with partially shaved manes at the bridle path. This is a common practice for racing Standardbreds, horses used in harness to pull carriages, as well as Thoroughbreds, show and pleasure horses. Among the many horses slaughtered were Thoroughbred and Standardbred racing stock.

Faulty Documentation

One registered Standardbred was a 4-year-old mare named "Spill the Ink", a descendant of Cam Fella. She raced as recently as April 8, 2011, only 3 months before being slaughtered.

Spill The Ink's EID has some of the worst omissions of all the 63 EIDs we reviewed. The owner's address was incomplete. No age was specified. The required Primary Location was not filled in, nor was the Primary Use of Animal checked. As she last raced on April 8, 2011, her registered owner is not the name written on the EID. The EID also states that this person had "uninterrupted possession, care or control of the animal" from January 1, 2011 to July 7, 2011, illustrating how poor recording practices are with regard to the EIDs examined. Despite receiving faulty documentation, they are accepted regardless by slaughterhouse personnel and the CFIA.

Note that her EID does not show her age, plus the owner's address is incomplete.

The image shows a photograph of an Equine Information Document (EID) form. The form is titled "EQUINE INFORMATION DOCUMENT (EID)" and contains various sections for recording horse information. It includes diagrams of a horse's head and body for marking locations. The form is filled out with handwritten information, including the owner's name "Spill the Ink", the date "01/01/2011", and the signature of the agent. The form is dated 01/01/2011 and 07/07/2011. The form is titled "EQUINE INFORMATION DOCUMENT (EID)" and contains various sections for recording horse information. It includes diagrams of a horse's head and body for marking locations. The form is filled out with handwritten information, including the owner's name "Spill the Ink", the date "01/01/2011", and the signature of the agent. The form is dated 01/01/2011 and 07/07/2011.

Horse Breed Notes

There were a wide variety of breeds, including a number of mules. Below is a sampling of the breeds:

Breed	Quantity
Belgian	21 (15%)
Standardbreds (suspected)	15
Paints	10
Percherons	7
Mules	6
Draft Crosses	5
Appaloosas	2

Transport to Quebec

Les Viandes de la Petite-Nation is located in St. Andre-Avellin, Quebec. EID evidence indicates the horses in this report were purchased primarily from 3 auctions:

Shipshewana Auction - Shipshewana, Indiana

1200 kilometers from La Petite-Nation

Over 13.5 hours transport time

Sugarcreek Auction - Sugarcreek, Ohio

1050 kilometers from La Petite-Nation

Over 12 hours transport time

Ontario Livestock Exchange (OLEX) - St. Jacobs, Ontario

645 kilometers from La Petite-Nation

Over 8 hours transport time

It's probable that many horses were transported over a number of days, and many may not have been afforded food and water during that time. Not surprisingly, a great number of horses in this report appear thin and dehydrated, as their final days consist of shipment to auction, then auction to holding pen, to long distance transport in crowded trailers, to overnight holding in the slaughter plant without food or water.

Improperly Designed Stun Box

The stun box was seen to have many deficiencies.

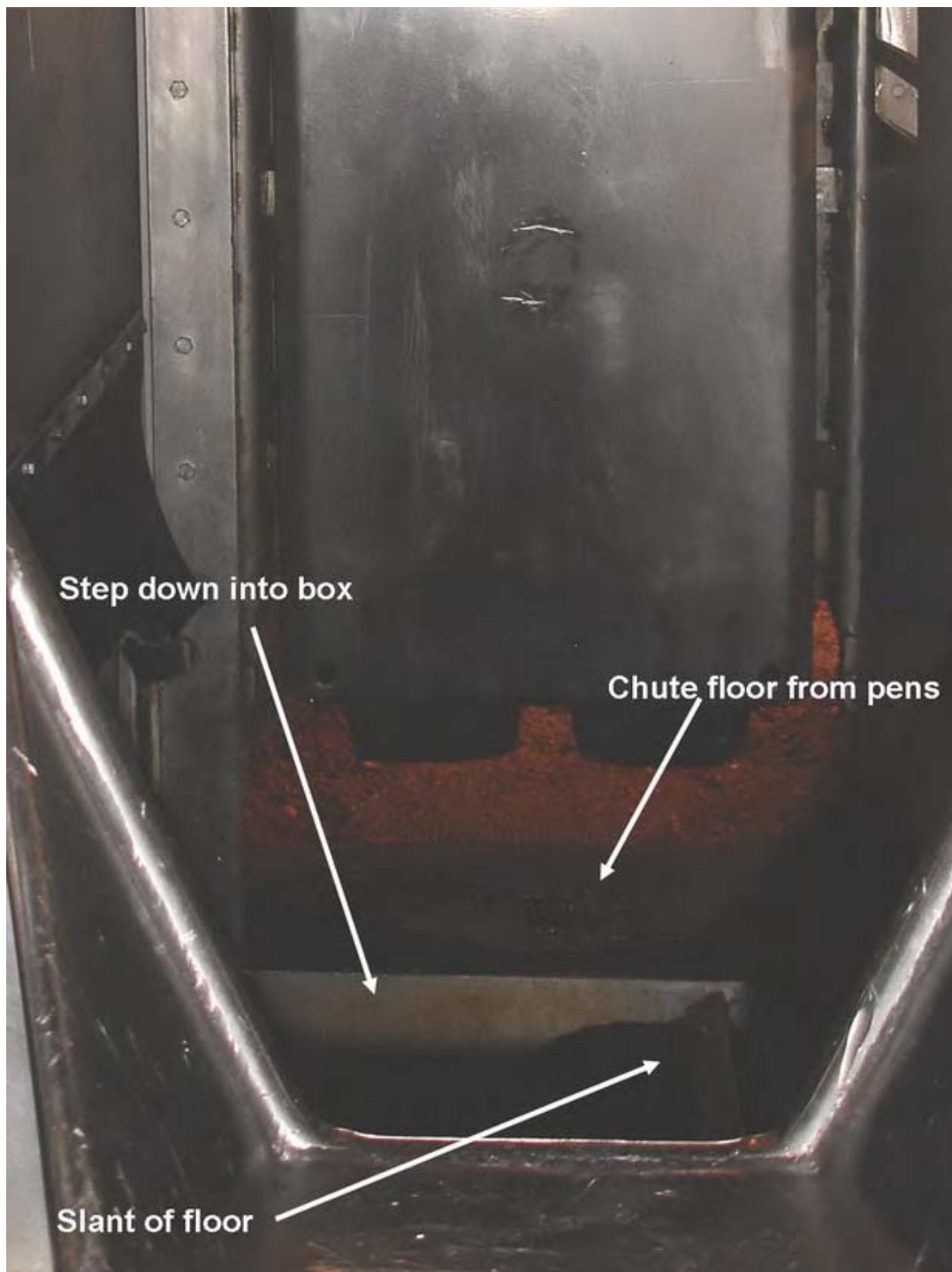
Most notably, the stun box is too small for the large draft horses that are common here. The Belgian in this image completely fills this small space. Like most of the other large drafts, he hit his head on the stanchion coming in to the box.



Also concerning for horses is the layout of the entrance into the stun box. They have to step down into it, as opposed to walking on a level surface from the kill line into the box. This is unsettling for the horses that are already in a frightened state.

Once in the box, the floor is slanted towards the dismembering room to allow gravity to cause the body to slide into the bleed out area.

The next image shows the step down, as well as the slanted floor.



The box and the shooter are on the same level, which means that the shooter must reach well above the heads of most of the horses to hit them with the captive bolt pistol, but in the majority of the time, this does not allow for the proper angle to be achieved.

In this image, this example being common practice, the shooter leans far over the horse's head to try to hit a moving target, making an accurate hit very difficult.



Most disturbing is that many of the horses were able to push their heads out the front of the stun box and peer into the butchering area where the horses before them were being hung, bled out and butchered. Many horses appeared increasingly agitated and frightened after doing so.

The image below shows Horse # 27 from Day 2 looking into the dismemberment area.



The image below is from the front of the stun box. The long plastic curtain hangs on the left where horses can look through to the dismemberment room. A short plastic curtain lines the side of the box that opens from the bottom to allow the horses' bodies to slide through into the dismemberment area.



Looking from this view, the area to the immediate right of the box is higher than where the shooter would stand. This makes no sense as reason would dictate that the shooter should be higher than the horses, not lower. The higher level platform on the right was used by an inspector to view slaughter proceedings a few times.

Most horses were head shy and some were also hesitant to lift their heads. With these animals the shooter used a flat plastic paddle to lift up their heads.

The drover who herded the horses to the stun box from the kill line used a whip to get the horses into the box. The whip was heard often and seen several times.

Many horses trembled very badly in the stun box and lost their footing repeatedly. Also, the floor of the box appears to be slanted, which may also partially explain why so many horses lost their footing in the box. Another factor is likely the accumulation of waste and blood from all the horses that went through previously.

In the next two pictures, the left side at the horses' eye level is completely open, which allows them to look through it easily, as this Percheron and Chestnut horse were able to do.



Improper Stuns

In total, 51 to 61 of 104 horses appeared to not have been rendered unconscious after the first shot on the first day; 17 to 24 of 60 horses on the second day. The shooters frequently made second and third shots, however, many of these appeared to be inaccurately placed.

Many of the shots appeared to have been placed far too high on the horses' heads (on the poll) or too low (between the horses' eyes). When the shooter would deliver a second, third, or fourth shot he would often do so to the far right or far left of the original shot. If the horse continued moving after this, the shooter would then "pith" the horse by shooting him or her at the base of the brain (at the poll). This is known to immobilize the animal but does not render it unconscious:

<http://www.fao.org/DOCREP/004/Y0660E/Y0660E01.htm>.

"Pithing unstunned animals is not an acceptable method of destruction as it is inhumane. It is essential on animals that have been stunned only, for example when captive-bolts are used on larger animals. Pithing is also a safety measure to prevent workers being struck by the involuntary movements of a stunned animal."

The retracting bolt of the captive bolt pistol also appeared to become jammed in the heads of a number of horses or perhaps did not emerge at all, leading to horses being hit repeatedly and growing increasingly frantic with each failed hit.

As mentioned above, the angle of numerous shots appeared to be incorrect. According to the CFIA's own instruction manual "Meat Hygiene Directive" (below) the angle of the shot should be from above, directed downwards and at an angle towards the spine of the horse. The positioning at La Petite-Nation, however, appeared incorrect, with the shooter standing lower than the horses' heads. This is especially disastrous for the draft horses.

Chapter 12, Page 22 - Food Animal Handling and Slaughter – Animal Welfare Requirements:

<http://www.inspection.gc.ca/english/fssa/meavia/man/ch12/annexae.pdf>

5 Horses

5.1 Mechanical

Important factors:

5.1.1 Handling and Restraint

- Horses vary a great deal in size.
- Handling and restraint facilities must meet current OIE and industry standards, including OSH requirements.
- Restraint facilities must be adaptable and appropriate to the size variation of the animals slaughtered.
- The restraint facilities must be suitable for the operator to stun the animal in an effective manner.

5.1.2 Landmark and approaches

- **Just above the intersection** (1 in.) of imaginary diagonal lines from the attachment of each **ear** to the medial canthus (middle corner) of the **opposite eye**. (See [b] and [c] below.)
- Plan the trajectory so that the bolt travels through the brain (cerebral hemispheres, midbrain, brainstem). The most significant of these are the midbrain and brainstem which are at the level of the bottom of the attachment of the ears. (See [a] below.)
- Hold and discharge the stunning device perpendicular to the front of the skull.
- The frontal bone over the brain is quite thin.

Midbrain and brain stem



[a]

Projectile Entry Point



[b]

Projectile Entry Point



[c]



Diagonal lines running from the inner corner of each eye to the upper edge of the attachment of the opposite ear.

Diagonal lines running from the inner corner of each eye to the upper edge of the attachment of the opposite ear.

Entry point of the projectile which is approximately one inch above the intersection of the diagonal lines.

Entry point of the projectile which is approximately one inch above the intersection of the diagonal lines.

Arrow indicating entry point into the skull and brain cavity.

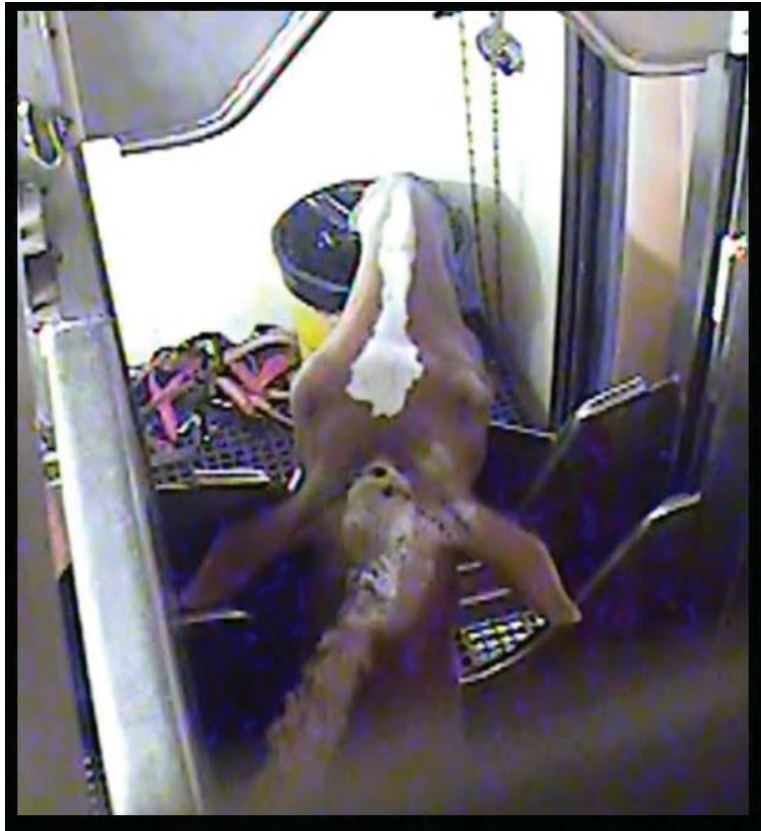
Location of the brainstem and midbrain – in the middle of the skull.

2011-02-10
RDIMS 2639717 v5

18

Also according to the diagram, the shot should be just above the point of intersection of an X drawn diagonally from each eye to each opposite ear. Yet, many of the shots delivered appeared consistently too high or too low on the horses' heads. Numerous second and third shots were either to the left or right of these initial shots and also appeared too high.

The photo below of Horse 40 shot on July 13, 2011 clearly shows where the first shot hit the horse towards the right and the other hole is from the second shot.



The shooter had ample opportunity to correctly place the captive bolt pistol in this instance as the photo below here shows that the horse was in a good position to be shot correctly.



It was also concerning that the shooters would frequently pound hard on the horses' heads with the captive bolt pistol, instead of placing it against the target area, which caused unnecessary fear and suffering to the horses in the moments before being stunned.

As noted above, there were, on occasion, two shooters. The primary shooter appeared to have had some training in working around horses and worked in a reasonably calm manner. The other shooter, whose primary job was to herd the horses into the stun box, appeared to be rough in his handling practices.

In summary, the many systemic problems at Viandes de la Petite-Nation resulted in terrifying, painful deaths for the majority of the horses documented, with over two-thirds being so frightened that their knees buckled, trembled badly and lost their footing, pawed, thrashed about or attempted to jump from the stun box.

Approximately 40% of the horses, having experienced the excruciating pain of a bolt piercing their faces and brains, remained standing, whinnying or flinching away from the shooter, when and if a second shot was delivered. **One horse appeared to have received up to 11 stunning attempts over the course of 3½ minutes** (Horse 33, Day 1).

Contributing to the inaccuracy of the stunning process is the assembly-line speed at which horses are moved from the stun box to the bleed-out room. The chart below illustrates just how little time elapses between one horse entering the stun box to the next horse going in.

The average time is approximately 3 minutes for a horse to be shot and then passed through to the bleed-out room. The larger gaps in time indicate breaks when no horse was in the stun box.

With speed being the driving factor, it is not surprising that the stun box is not cleaned out properly between horses entering it, and that the assembly-line slaughter of horses results in numerous inaccurate shots with unnecessary suffering.

Day 1

Horse #	Video	Time horse enters stun box
1	11074938	16:13
2	11074938	17:32
3	11074938	19:14
4	11074938	22:37
5	11074938	24:07
6	11074938	25:40
7	11074938	28:41
8	11074938	30:18
9	11074938	34:11
10	11082608	00:38
11	11082608	03:35
12	11082608	05:00
13	11082608	06:50

Day 2

Horse #	Video	Time horse enters stun box
1	11074922	10:49
2	11074922	14:13
3	11074922	17:18
4	11074922	18:55
5	11074922	20:44
6	11074922	22:47
7	11074922	24:21
8	11074922	25:45
9	11074922	28:11
10	11074922	29:59
11	11074922	31:54
12	11074922	34:32
13	11082557	00:06

Day 1

Horse #	Video	Time horse enters stun box
14	11082608	09:38
15	11082608	11:51
16	11082608	14:10
17	11082608	15:49
18	11082608	18:50
19	11082608	19:55
20	11082608	23:33
21	11082608	25:46
22	11082608	27:52
23	11082608	29:15
24	11082608	34:12
25	11090239	04:04
26	11090239	06:24
27	11090239	09:41
28	11090239	14:37
29	11090239	17:08
30	11090239	18:36
31	11090239	21:14
32	11090239	23:25
33	11090239	25:28
34	11090239	29:11
35	11090239	32:59
36	11090239	34:55
37	11093915	00:17
38	11093915	04:24
39	11093915	33:21
40	11101547	00:35
41	11101547	02:50
42	11101547	05:24
43	11101547	07:37
44	11101547	09:39
45	11101547	22:13
46	11101547	23:56
47	11105218	07:35
48	11105218	09:09
49	11105218	10:58
50	11105218	14:09
51	11105218	15:51
52	11105218	20:14
53	11105218	22:44
54	11105218	24:18
55	11105218	25:24

Day 2

Horse #	Video	Time horse enters stun box
14	11082557	03:36
15	11082557	05:30
16	11082557	07:15
17	11082557	09:14
18	11082557	12:09
19	11082557	14:50
20	11082557	17:47
21	11082557	20:11
22	11082557	22:46
23	11082557	24:46
24	11082557	26:33
25	11082557	29:14
26	11082557	31:50
27	11082557	36:17
28	11090227	02:09
29	11090227	03:43
30	11090227	12:10
31	11090227	14:55
32	11090227	17:16
33	11090227	19:55
34	11090227	21:36
35	11090227	23:30
36	11090227	25:16
37	11090227	28:11
38	11090227	31:23
39	11090227	34:45
40	11090227	36:04
41	11093857	00:58
42	11093857	03:15
43	11093857	33:00
44	11093857	34:33
45	11093857	36:20
46	11101527	01:45
47	11101527	03:07
48	11101527	04:29
49	11101527	06:32
50	11101527	08:08
51	11101527	09:16
52	11101527	11:02
53	11101527	12:37
54	11101527	14:44
55	11101527	16:35

Day 1

Horse #	Video	Time horse enters stun box
56	11105218	26:36
57	11105218	28:39
58	11105218	33:00
59	11112847	00:26
60	11112847	12:09
61	11112847	15:39
62	11120517	30:19
63	11120517	34:35
64	11124148	00:10
65	11124148	01:58
66	11124148	05:27
67	11124148	06:55
68	11124148	10:02
69	11124148	12:03
70	11124148	13:50
71	11124148	16:45
72	11124148	32:19
73	11124148	33:49
74	11124148	35:28
75	11131817	34:30
76	11135447	00:19
77	11135447	02:05
78	11135447	03:10
79	11135447	05:07
80	11135447	06:40
81	11135447	07:46
82	11135447	09:32
83	11135447	11:56
84	11135447	13:34
85	11135447	16:57
86	11135447	18:13
87	11135447	19:40
88	11135447	21:06
89	11143118	09:08
90	11143118	11:29
91	11143118	13:13
92	11143118	14:50
93	11143118	18:13
94	11143118	19:27
95	11143118	21:05

Day 2

Horse #	Video	Time horse enters stun box
56	11101527	18:50
57	11101527	21:16
58	11101527	22:52
59	11101527	26:41
60	11101527	28:30

Day 1

Horse #	Video	Time horse enters stun box
96	11143118	22:51
97	11143118	25:05
98	11143118	26:33
99	11143118	28:20
100	11143118	33:10
101	11143118	35:49
102	11150747	01:20
103	11150747	03:18
104	11150747	04:55

Subject to the evidence provided by the footage, we conclude that Viandes de la Petite-Nation should receive a **Fail** on 3 of 4 Core Criteria on the American Meat Institute Slaughter Audit standards, with a possible Automatic **Fail** for Bleed-Rail Sensibility.

Based on the evidence and audit failure rating, the CHDC calls on the CFIA and the Canadian government to immediately close Les Viandes de la Petite-Nation slaughter plant and adopt Bill C-322, an Act which will ban the slaughter of horses as well as the importing and exporting of horses to slaughter in Canada:

<http://www.parl.gc.ca/HousePublications/Publication.aspx?Language=E&Mode=1&DocId=5159966&File=24>.

We have done our best at detailing the video in the attached Footage Index. Short compilations of the footage are available on our website at www.defendhorsescanada.org.

For further inquiries please contact the undersigned:

Sinikka Crosland
Executive Director
250.768.4803
info@defendhorsescanada.org

Twyla Francois
Central Region Director
204.296.1375
twyla.1@mts.net

Pour un interview en français, contactez Dr. Olivier Berreville – 204.891.8136

Canadian Horse Defence Coalition

December, 2011

150 First Street
P.O. Box 21079
Orangeville, ON L9W 4S7

VIOLATIONS OF CANADIAN LAWS

Meat Inspection Act – Part III

Examination, Inspection, Humane Treatment and Slaughter, Packaging and Labelling:

<http://laws-lois.justice.gc.ca/eng/regulations/SOR-90-288/page-20.html>

Meat Inspection Act - PART III

Examination, Inspection, Humane Treatment and Slaughter, Packaging and Labelling

62.(1) No food animal shall be handled in a manner that subjects the animal to avoidable distress or avoidable pain.

63.(2) Every food animal that is obviously diseased or injured shall immediately be segregated from apparently healthy food animals.

64. Every holding pen that is used for food animals awaiting slaughter shall be provided with adequate ventilation and shall not be used in a manner that results in their overcrowding.

65. Every food animal in a holding pen awaiting slaughter shall be provided with access to potable water and shall, if held for more than 24 hours, be provided with feed.

78. No food animal, other than a bird or domesticated rabbit, shall be suspended for the purpose of slaughter unless, immediately before being suspended, it is rendered unconscious or killed by a method set out in section 79.

79. Every food animal that is slaughtered shall, before being bled,
(a) be rendered unconscious in a manner that ensures that it does not regain consciousness before death, by one of the following methods:

(i) by delivering a blow to the head by means of a penetrating or non-penetrating mechanical device in a manner that causes immediate loss of consciousness.

80. No equipment or instrument for restraining, slaughtering or rendering unconscious any food animal shall be used by any person for those purposes

(a) unless the person is, by reason of the person's competence and physical condition, able to do so without subjecting the animal to avoidable distress or avoidable pain; or

(b) where the condition of the equipment or instrument or the manner in which or the circumstances under which the equipment or instrument is used might subject the animal to avoidable distress or avoidable pain.

AUDIT RESULTS

American Meat Institute – Slaughter Audit Forms:

<http://www.animalhandling.org/ht/a/GetDocumentAction/i/58636>

Based on Dr. Temple Grandin/American Meat Institute Audit

Date of Killing: Wednesday, July 13, 2011

Core Criteria 1: Effective Stunning

95% accuracy is required for a passing score

Between 49%-59% of horses (of a total of 104) appeared to have been mis-shot and showed clear signs of revival in the form of remaining standing, standing back up, and/or head shaking. (49% were shot two or more times with one horse shot up to 11 times. An additional 10% showed signs of not being rendered unconscious after the first shot, but were not afforded further shots while in the stun box.)

RESULT: FAIL

Core Criteria 2: Bleed Rail Insensibility

Any sensible animal on the bleed rail constitutes an automatic audit failure. It is critical that animals showing signs of a return to sensibility be re-stunned immediately.

0% tolerated

While we are not able to see into the suspension/butchering area, the shooter carried a captive bolt pistol out from the area to hose it off as it was covered with blood. This captive bolt pistol was of a different style than the one used in the stun box. We question why the pistol was so blood smeared. Had it been used on horses in the suspension/butchering area who had already sustained at least one shot and had a blood covered face or head?

RESULT: POSSIBLE AUTOMATIC FAIL

Core Criteria 3: Slips and Falls (only Falls counted and only in the stun box)

1% or fewer falls are required for a passing score

While many horses appeared to be terrified in the stun box, lost their footing, thrashed or flailed "only" 4 fell such that their body touched the floor.

RESULT: PASS

Core Criteria 4: Vocalization

3% or less should vocalize (provoked by stress or agitation)

10% of horses vocalized, some as frequently as up to seven times.

RESULT: FAIL

Based on Dr. Temple Grandin/American Meat Institute Audit

Date of Killing: Thursday, July 14, 2011

Core Criteria 1: Effective Stunning

95% accuracy is required for a passing score

Between 28%-40% of horses (of a total of 60) appeared to have been mis-shot and showed clear signs of revival in the form of remaining standing, standing back up, and/or head shaking. (28% were shot two or more times). An additional 7 horses showed signs of not being rendered unconscious after the first shot, but were not afforded further shots while in the stun box. In the case of Horse 30, this was because the captive bolt pistol malfunctioned.

RESULT: FAIL

Core Criteria 2: Bleed Rail Insensibility

Any sensible animal on the bleed rail constitutes an automatic audit failure. It is critical that animals showing signs of a return to sensibility be re-stunned immediately.

0% tolerated

While we are not able to see into the suspension/butchering area, the shooter carried a captive bolt pistol out from the area to hose it off as it was covered with blood. This captive bolt pistol was of a different style than the one used in the stun box. We question why the pistol was so blood smeared. Had it been used on horses in the suspension/butchering area who had already sustained at least one shot and had a blood covered face or head?

RESULT: POSSIBLE AUTOMATIC FAIL

Core Criteria 3: Slips and Falls (only Falls counted and only in the stun box)

1% or fewer falls are required for a passing score

While many horses appeared to be terrified in the stun box, lost their footing, thrashed or flailed "only" 1 fell such that their body touched the floor. This horse (Horse 8) fell repeatedly.

RESULT: FAIL

Core Criteria 4: Vocalization

3% or less should vocalize (provoked by stress or agitation)

17% of horses vocalized, some as frequently as up to six times.

RESULT: FAIL

In summary, at least 40% of the horses were not stunned after the first shot and, according to the OIE (World Organisation for Animal Health) based in Europe, under Chapter 7.5 “Slaughter of Animals”, the standards of humane killing of horses are not being met at this facility.

The EU bases their criteria on the OIE standard:

<http://www.oie.int/international-standard-setting/terrestrial-code/>

Slaughter of Animals – Horses, Page 15.

http://www.oie.int/fileadmin/Home/eng/Health_standards/tahc/2010/en_chapitre_1.7.5.pdf

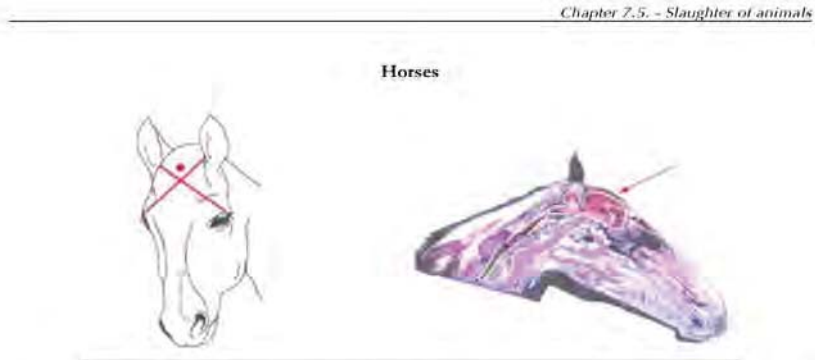


Figure Source: Humane Slaughter Association (2005) Guidance Notes No. 3: Humane Killing of Livestock Using Firearms. Published by the Humane Slaughter Association, The Old School, Brewhouse Hill, Wheathampstead, Hertfordshire AL4 8AN, United Kingdom (www.hsa.org.uk).

The optimum position for horses is at right angles to the frontal surface, well above the point where imaginary lines from eyes to ears cross.

Signs of correct *stunning* using a mechanical instrument are as follows:

- a) the *animal* collapses immediately and does not attempt to stand up;
- b) the body and muscles of the *animal* become tonic (rigid) immediately after the shot;
- c) normal rhythmic breathing stops; and
- d) the eyelid is open with the eyeball facing straight ahead and is not rotated.

Figure Source: Humane Slaughter Association (2005) Guidance Notes No. 3: Humane Killing of Livestock Using Firearms. Published by the Humane Slaughter Association, The Old School, Brewhouse Hill, Wheathampstead, Hertfordshire AL4 8AN, United Kingdom (www.hsa.org.uk).

FOOTAGE INDEX LES VIANDES DE LA PETITE-NATION INC.

NOTE:

NUMEROUS FIRST SHOTS APPEARED TO HAVE BEEN INACCURATELY PLACED TOO HIGH ON THE HEAD.
MANY SECOND SHOTS APPEARED TO HAVE BEEN AIMED BOTH TOO HIGH AND TOO FAR TO THE RIGHT.
MANY THIRD SHOTS APPEARED TO HAVE BEEN AIMED BOTH TOO HIGH AND TOO FAR TO THE LEFT.

ADDITIONAL NOTES:

- Camera is located above and to the rear of stun box, angled downward toward the head of the horse in the stun box and the shooter in front of it



Colour Key

Red	Inaccurate hit, horse remains conscious
Purple	Horse shows signs of fear
Green	Horse slips and falls
Blue	Horse vocalizing from fear
Brown	Horse Shows signs of injury, infection or illness
Orange	CFIA present

WEDNESDAY, JULY 13, 2011

VIDEO 11082608

Horse 12 This horse is seen in the video "Pasture to Plate"

04:55 Small bay horse

05:00 Horse sniffs blood left in head stanchion

05:07 Horse attempts to jump out of the stun box, loses footing and falls

05:18 Both the shooter and the man moving the horses into the stun box appear. Shooter says, "Après vous."



In this image the little horse is still trying to regain his footing when the drover reaches in with the captive bolt pistol.

05:20 The drover shoots the horse

05:21 The shooter immediately shoots the horse a **second** time with a different captive bolt pistol



Here the horse is shot a second time.

05:42 Side of the stun box is lifted

06:00 Horse is pulled through

VIDEO 1090239

Horse 27 – 12-year-old Belgian stallion, 19HH

EQUINE INFORMATION DOCUMENT (EID)

524

OWNER'S NAME: _____
FULL ADDRESS: _____
PHONE NUMBER: _____
PRIMARY LOCATION OF ANIMAL: _____
PRIMARY USE OF ANIMAL: STOCK RAISING
SEX: STALLION **AGE:** 12

LIST VISIBLE ACQUIRED MARKS:
 (brands, tattoos, scars, etc... & location)
 PICTURE: attach by taping to this document a clear printed color picture showing each of the sides in the diagram of the animal in this document. The picture should be large enough to see the details required. The print shall be secured on a standard 8 1/2 x 11" page. Owners sign and date the picture.

I, I am the owner of the animal identified on this document and have had uninterrupted possession, care or control of the animal.
 From date 8-16-01 to date 7-5-11
 I have any drugs or medicines been administered to or consumed by the animal during the last 180 days or during the time you owned the animal? NO
 IF YES: write the name of the drug(s) or medicine(s), the date of use, withdrawal period for drugs, amount used (cover per treatment if the label does not indicate a dose or if drugs are used a dosage different than the label indicates on this back side into space.

I have the animal identified on this document been diagnosed with an illness during the last 180 days or during the time you owned the animal? NO
 IF YES: describe details with dates of diagnosis and recovery on the back side of the page.

I have the animal identified on this document to your knowledge been treated with a substance listed under the table named substances not permitted for use in food processing animals found in section 5.3 during the last 180 days or during the time you owned the animal? NO

I, OWNER DECLARATION: As the owner of the animal identified on this document I hereby verify that the information in this EID is accurate and complete.
 I understand that, effective July 31, 2010, at least six continuous months of documented acceptable history is required for an equine presented for processing in an establishment inspected by CFIA.
 I always treated the animal with respect and care to meet the needs.

DATE: 7-5-11 **SIGNATURE:** _____

TRANSPORT AGENT DECLARATION: This animal identified on this document has been under my care and control from 7-5-11 to 7-5-11 (date). During this time period the identified animal has not been given or fed drugs or vaccines and has not shown any signs of illness.

Name of Agent: STEVE LANDFAR
Address: 5400 HUNTERDOCK RD. SAROUE, ON
Phone Number: 530-465-5101
Signature of Agent: _____

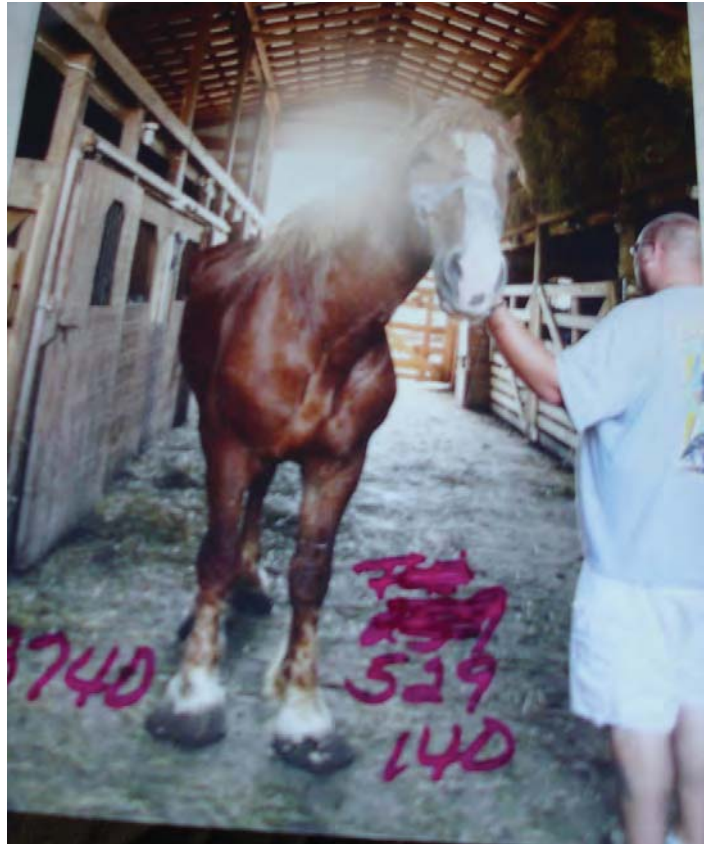
Buyer ID (batch number) _____
of horses shipped _____
Tag number 524, 140
Export Tag Number 3750
Slaughter serial # _____

Body Color: (check the correct box)
☐ Black ☐ Bay ☐ Chestnut ☐ Liver chestnut ☐ Dark chestnut ☐ Light chestnut ☐ Grey ☐ White ☐ Chestnut or Sorrel with a flaxen mane and tail

Head markings: (check the correct box)
☐ Star ☐ Blaze ☐ Stripe ☐ Grey Sided ☐ Faced ☐ Black marks or dark marks ☐ Leopard

Coat markings: (check the correct box)
☐ Blue Roan ☐ Appaloosa ☐ Gray ☐ Strawberry ☐ Dun ☐ Cream ☐ Painted (black & white) ☐ Shaded (all other color duns)

Limb markings: Right Foreleg Left Foreleg Right Hind Leg Left Hind Leg
☐ White paction on cannon ☐ Ankle ☐ Lateral ☐ Medial ☐ Forefoot ☐ White coronet ☐ White pastern ☐ White fetlock ☐ White to knee ☐ White to hock ☐ White in hind quarter ☐ Location: Head, legs, etc.



- 09:40 Large Belgian with halter on tentatively enters still bloody stun box (white auction sticker: 140, green kill-only USDA sticker: 3740)
- 09:41 Horse sniffs blood in head stanchion while drover can be heard yelling behind horse trying to get him to move ahead
- 09:50 Horse looks into suspending/butchering area; moves ahead suddenly
- 10:00 Horse stares into suspending/butchering area
- 10:08 Halter is removed
- 10:13 Horse continues to stare into bleed out room
- 10:20 Horse is shot with captive bolt pistol (audio lag)
- 10:26 Horse is shot a **second** time
- 10:28 Horse lifting head, moving
- 10:39 Horse is still slightly moving
- 10:42 More movement of this horse's head seen
- 10:51 Horse falls through open side of stun box

Horse 29 – 10-year-old mare, 16HH

EID Primary Location not filled in, EID owner is using phone number of agent

#118
#516

EQUINE INFORMATION DOCUMENT (EID)

OWNER'S NAME: TOBERA SARA
 FULL ADDRESS: 516 101 3746
 PHONE NUMBER: 516 101 3746
 PRIMARY LOCATION OF ANIMAL: 516 101 3746
 PRIMARY USE OF ANIMAL: 516 101 3746
 SEX: Y AGE: 10

LIST VISIBLE ACQUIRED MARKS:
 (brands, tattoos, scars, etc. & location)

PICTURE: Attach by stapling to this document a clear printed color picture showing each of the views to the diagram of the animal in this document. The picture should be large enough to see the details required. The views shall be printed on a standard 8 1/2 x 11" page. Owners sign and date this picture.

I am the owner of the animal described on this document and have not relinquished possession, care or control of the animal.
 From date 8-1-2008 to date 7-8-2011
 I have any drugs or vaccines been administered to or consumed by the animal during the last 180 days or during the time you owned the animal? ☐ Yes ☒ No

If YES: Write the name of the drug(s) or vaccine(s), lot date of use, withdrawal period for drugs, amount used (dose) per treatment if the label does not indicate a dose or if drugs is used a dosage different than the label, indicate on the back side this page.

If YES: provide dates with dates of diagnosis and recovery on the back side of the page.

I, the owner identified on this document, hereby certify that the information in this EID is accurate and complete.

Understand that, effective July 31, 2012, at least six consecutive months of documented acceptable history is required for an equine intended for processing in an establishment regulated by CFIA.

I always treated the animal with respect and care to meet the needs.

Date: 7-8-2011 Signature: Steve Landford

TRANSIENT AGENT DECLARATION: This animal identified on this document has been under my care and control from 7-8-2011 (date) to 7-8-2011 (date). During this time period the identified animal has not been given or fed drugs or vaccines and has not shown any signs of illness.

Name of Agent: STEVE LANDFORD
 Address: 516 101 3746
 Phone Number: 516 101 3746
 Signature of Agent: Steve Landford

Buyer ID (batch number):
 # of horses shipped:
 Tag number: 516 101 3746
 Export Tag Number:



16:54 Nervous, sweaty-looking, probably a Standardbred, thin bay mare with bridle path shaved enters the stun box (white auction sticker: 101, green kill-only USDA sticker: 3746)

17:08 She looks into suspending/butchering area repeatedly

17:31 Shooter has been trying to line up shot saying "whoa, whoa"

17:36 She's very head shy, swinging head around to avoid shooter

17:38 She's shot while looking into suspending/butchering area

17:44 Blood can be seen spurting out of the hole when her head falls backwards. She does not appear to be totally unconscious as there is movement of her head as she falls

18:03 Chin lift of stanchion pooling with blood

Horse 31 – 13-year-old Belgian mare, 19HH

Her EID photo shows that she was malnourished, EID does not note 4 white socks, EID Primary Location not filled in, EID owner using phone number of agent.

EQUINE INFORMATION DOCUMENT (EID)



Height to Hocks
(1 hand = 4 inches)

☐ Optional Attachments

☐ Pictures (on all sides)

☐ Pedigree Registration Papers

Drawing (the picture shall not be required if) Lines are to be drawn on the diagrams representing white areas on the animal where applicable with red pen the others with black pen. Mark whorls with an "X". Mark the location of scars with an "X". If an official passport, the exception may be attached. Attached EID from the previous owner(s).

For more explanation on the color terms or marks, consult the internet site: <http://www.horsepass.com/education/faq/faq.htm#color>

OWNER'S NAME: _____

FULL ADDRESS: _____

PHONE NUMBER: _____

PRIMARY LOCATION OF ANIMAL: _____

PRIMARY USE OF ANIMAL: _____

SEX: MARE **AGE:** 18

LIST VISIBLE ACQUIRED MARKS:
(brands, tattoos, scars, etc... & location)

PICTURE: Attach by taping to this document a clear printed color picture showing each of the views in the diagram of the animal in this document. The picture should be large enough to see the details required. The views shall be printed on a standard 8.5"x11" page. **Owners sign and date the picture.**

1. I am the owner of the animal identified on this document and have had uninterrupted possession, care or control of the animal.

2. I have any drugs or vaccines been administered to or consumed by the animal during the last 180 days or during the time you owned the animal? ☐ Yes ☒ No

IF YES: Write the name of the drug(s) or vaccine(s), last date of use, withdrawal period for drugs, amount used (dose) per treatment if the label does not indicate a dose or if drugs is used a dosage different than the label indicate on the back side this page. ☐ Yes ☒ No

3. Has the animal identified on this document been diagnosed with an illness during 180 days or during the time you owned the animal? ☐ Yes ☒ No

IF YES: provide details with dates of diagnosis and recovery on the back side of the page.

4. Has the animal identified on this document to your knowledge been treated with a substance listed under the table named substances not permitted for use in food processing equine found in section 5.5 during the last 180 days or during the time you owned the animal? ☐ Yes ☒ No

5. OWNER DECLARATION: As the owner of the animal identified on this document I hereby certify that the information in this EID is accurate and complete.

I understand that, effective July 31, 2010, at least six continuous months of documented acceptable history is required for an equine prequalified for processing in an establishment inspected by CFIA.

I always treated the animal with respect and care to mark the needs.

Date: 7-25-2011 Signature: Steve Landman no black ink

TRANSIENT AGENT DECLARATION: This animal identified on this document has been under my care and control from 7-25-2011 (date) to 7-25-2011 (date) during this time period the identified animal has not been given or had drugs or vaccines and has not shown any signs of illness.

Name of Agent: Steve Landman

Address: 3446 Millbrook Rd. Shreveport, LA 71206

Phone Number: 930 465-5141

Signature of Agent: Steve Landman

Body Color
(check the correct box)

☐ Black	☐ Brown	☐ Bay	☐ Red Roan	☐ Red Roan
☐ Bay	☐ Bay - Brown	☐ Palomino	☐ Appaloosa	☐ Grey
☐ Chestnut	☐ Liver chestnut	☐ Dark chestnut	☐ Light chestnut	☐ Strawberry
☐ Roan	☐ Chestnut or Sorrel	☐ Cream	☐ White	☐ Cream
☐ White	☐ White	☐ White	☐ White	☐ White

Head markings
(check the correct box)

☐ Star	☐ Blaze	☐ Star	☐ White muzzle
☐ Stripe	☐ White face	☐ Facial mark	☐ White muzzle

Coat markings
(check the correct box)

☐ Grey ticked	☐ Flecked	☐ Patch (color, shape, position, extent)	☐ Zebra marks
☐ Black marks or dark marks	☐ Leopard	☐ Whorls stripe	☐ Lias

Limbs markings

Right Foreleg	Left Foreleg	Right Hind Leg	Left Hind Leg
---------------	--------------	----------------	---------------

Submit on computer

color

size

type

material

brand

date

price

location

notes



21:10 Belgian mare comes into stun box (3 tags – 2 white, 1 green
white auction sticker: 290, green kill-only USDA sticker: 3738)
Hits her head on top of stanchion
21:14 "HEY! HUP!" can be heard as the drover pushes the horse from behind
21:18 Her mane is twitching
21:21 Can hear a horse whinnying
21:35 She's head shy, shooter has difficulty aiming
21:38 She's shot with captive bolt pistol, her body heaves forward and up
21:42 She tries to get back on her feet
21:46 She's shot a **second** time into right temple, slowly sinks down, shaking



22:08 She falls through as the side of the stun box is lifted and she slides into bleed out

Horse 33 – 9-year-old Belgian gelding, 18HH

This horse is seen in the video “Pasture to Plate”

EID shows head markings as a blaze not stripe as entered, EID

Primary Location not filled in, EID owner is using phone number of agent.

EQUINE INFORMATION DOCUMENT (EID)



Height in Hands: 18
(1 hand = 4 inches)

Optional Attachments

☐ Pictures (all four sides)

☐ Pedigree Reg. Papers

DRAWING (the picture shall not be required if): Lines are to be drawn on the diagrams representing white areas on the animal where applicable with red pen the others with black pen. Mark whorls with an "X". Mark the location of scars with an "X". If an official passport, the passport may be attached. Attached EID from the previous owner(s).

For more explanation on the color terms or marks, consult the internet site:
<http://www.inspection.gc.ca/en/ahis/hsa/mea/ai/aman/ch17/annexa.html>

Body Color (check the correct box)	☐ Black	☐ Brown	☐ Blue Roan	☐ Red Roan
	☐ Bay	☐ Bay - Brown	☐ Palomino	☐ Grey
	☐ Chestnut		☐ Appaloosa	☐ Grey
	☐ Liver chestnut		☐ Grey	☐ Strawberry
	☐ Dark chestnut		☐ Grey	☐ Dun
	☐ Light chestnut		☐ Cream	☐ Piebald (black & white)
	☐ Sorrel		☐ Skewbald (all other color combos)	
	☒ Chestnut or Sorrel with a flaxen mane and tail			

Head markings (check the correct box)	☐ Star	☐ Blaze	☐ Snip	☐ White muzzle
	☐ Stripes	☐ White face	☐ Flash mark	
	☐ Grey sockie		☐ Patch (colour, shape, position, extent)	
	☐ Flecked		☐ Zebra marks	
	☐ Black marks or dark marks		☐ Withers stripe	
	☐ Leopard		☐ List	

Limb markings	Right Foreleg	Left Foreleg	Right Hind Leg	Left Hind Leg
like patch on coronet				
Anterior				
Unilateral				
Medial				
Posterior				
Anterior				
Unilateral				
Medial				
Posterior				
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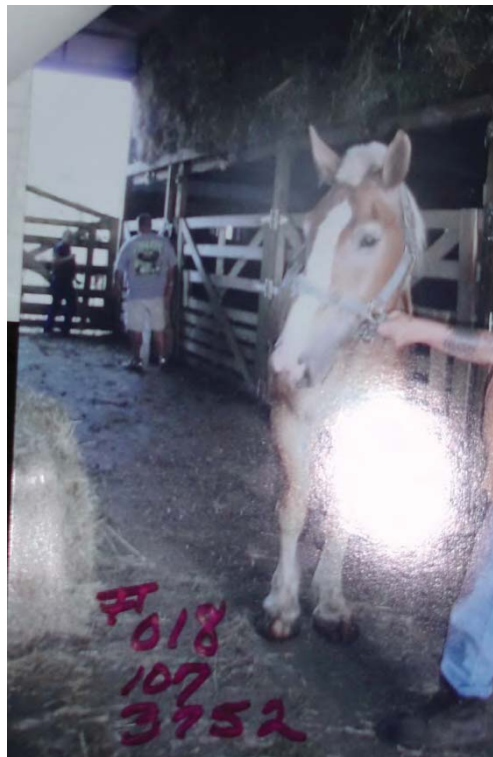
- 25:22 Very large Belgian (white auction sticker: 451)
- 25:28 He is looking into bleed out room but snaps head back as shooter comes through door
- 25:35 He again looks into suspending/butchering area
- 25:52 He's shot, head falls into head stanchion
- 25:56 **Second** stunning attempt while head in stanchion
- 26:05 **Third** stunning attempt, convulsions appear to be increasing
- 26:10 Horse's body drops, convulsions increase
- 26:11 Horse appears to be struggling to regain his footing
- 26:13 **Fourth** stunning attempt, just above left eye on the side of his head
- 26:19 Still reacting to sound
- 26:29 While attempting to rise, horse receives **fifth** stunning attempt, into the left temple, head is still up
- 26:33 **Sixth** stunning attempt on top at poll; he continues to move
- 26:40 **Seventh** stunning attempt on top of head in mane
- 26:43 Still trying to move, pushing forward, ears are still moving, HORSE IS OBVIOUSLY STILL CONSCIOUS
- 26:46 Shooter says "Aye - you're not dead"
- 26:50 Shooter goes into suspending/butchering area
Horse is left struggling and conscious
- 26:53 Horse struggles, pulls ears back and forward, still clearly breathing heavily, body heaving with each breath
- 26:57 Shooter returns from suspending/butchering area with a different captive bolt pistol, larger
- 27:01 **Eighth** stunning attempt with new captive bolt pistol on top of head in his mane
- 27:04 **Ninth** stunning attempt into poll with new captive bolt pistol
- 27:08 Horse flinches, pulls ears back as though in pain
- 27:13 **Tenth** stunning attempt, horse continues to move and breathe
- 27:16 Horse is still moving
- 27:26 **Eleventh** stunning attempt at base of the brain; ears flick then the horse lurches forward and then violently falls backwards, but is still showing signs of movement
- 28:52 Side of stun box is opened and horse finally slides through

Horse 35 – 15-year-old Belgian gelding, 18.1HH

EID photo shows head markings as a blaze not stripe as entered, EID
Primary Location not filled in, EID owner is using phone number of agent.

EQUINE INFORMATION DOCUMENT (EID)

OWNER'S NAME: STANLEY CH
 FULL ADDRESS: 107 107 3952
 PHONE NUMBER: 330-415-5141
 PRIMARY LOCATION OF ANIMAL: FEED MARK
 SEX: Female AGE: 15
 LIST VISIBLE ACQUIRED MARKS: (brands, tattoos, scars, etc. & location)
 PICTURE: Attach by taping to this document a clear, printed color picture showing each of the views in the diagram of the animal in this document. The picture should be large enough to see the details required. The view shall be printed on a standard 8.5"x11" page. Owners sign and date the picture.
 I am the owner of the animal identified on this document and have had unrestricted possession, care or control of the animal.
 From date 5-11-01 to date 7-7-11
 Have any drugs or medicines been administered to or administered by the animal during the last 180 days or during the time you owned the animal? ☐ Yes ☒ No
 If YES, write the name of the drug(s) or vaccine(s), last date of use, withdrawal period for drugs, amount used (dose) and treatment. If the label does not indicate a dose or if drugs is used a dosage different than the label indicates on the label, indicate the dosage.
 Has the animal identified on this document been diagnosed with an illness during 180 days or during the time you owned the animal? ☐ Yes ☒ No
 If YES, provide details with signs of diagnosis and recovery on the back side of the page.
 Has the horse identified on this document been treated with a substance listed under the same name as substances not permitted for use in food processing equine found in section 6.3 during the last 180 days or during the time you owned the animal? ☐ Yes ☒ No
 I, OWNER DECLARATION: As the owner of the animal identified on this document I hereby certify that the information in this EID is accurate and complete.
 I understand that, effective July 31, 2010, at least six consecutive months of documented acceptable history is required for an equine processed for processing in an establishment inspected by CFIA.
 I always treated the animal with respect and care to meet the needs.
 Date 7-9-2011 Signature: [Signature]
 TRANSFER AGENT DECLARATION: The animal identified on this document has been under my care and control from 7-9-2011 (date) to 7-9-2011 (date). During this time period the identified animal has not been given or fed drugs or vaccines and has not shown any signs of illness.
 Name of Agent: STEVE LANDOLT
 Address: 107 107 3952
 Phone Number: 330-415-5141
 Signature of Agent: [Signature]
 Buyer ID (batch number) 018 107
 # of horses shipped 1
 Tag number 3752
 Export Tag Number
 Slaughter serial #



#018
107
3952

- 32:48 Large Belgian gelding slowly enters still-bloody stun box (two auction stickers, one white auction sticker: 107)
- 32:59 He repeatedly looks into suspending/butchering area and flinches away from it
- 33:36 Horse is shot too far back, between his ears and falls down (audio lag)



Can see the hole from the bullet in the horse's poll

- 33:41 He falls backwards with head caught up on head stanchion chin lift
- 33:51 Side of stun box is lifted; horse is observed to have visible, excessive lip motion while sliding under door indicating that this horse may not have been fully unconscious
- 33:56 As with almost all previous horses, shooter follows horse into suspending/butchering area

EID shows owner and signed name do not match, EID does not note markings on legs, EID Primary Location not filled in, EID owner is using phone number of agent.

The Canadian Horse Defence Coalition



- 00:15 Large Belgian gelding is urged into the stun box as we hear the drover yell "Hup!" (white auction sticker: 289; green kill-only sticker: 3737)
- 00:17 He sniffs the blood left from the horse before in head stanchion chin lift
- 00:25 Horse looks into suspending/butchering area
- 00:33 Horse trembling on his feet
- 00:49 Horse is shot with captive bolt pistol while shooter talking with someone, horse begins violently thrashing.
Thrashing continues and is so strong, camera skips.
- 00:52 Horse is shot a **second** time with smaller gun
- 00:57 Male voice can be heard yelling "YEE-HAW!"
- 01:03 Horse's thrashing finally stops
- 01:13 Horse has been slowly sliding down in the box. Can see ears are still slightly moving and forward
- 01:24 Side of stun box lifted horse slowly slides down and out of box
- 01:25 Shooter watches as horse slides out of box then goes to the door of bleed room and looks down towards where the horse is then goes into bleed out room
- 01:46 The drover also goes into the bleed out room looking down toward where the shooter and horse appear to be located
- 01:53 Can hear someone say "ah, tabernac" as though something has gone wrong
- 02:10 Drover closes door to bleed out room
- 02:45 Drover opens door to bleed out room
- 03:00 Drover appears at front of box and hoses down his boots
- 03:15 Drover hoses chin lift and front of box
- 03:39 Drover closes door to bleed out and hoses out rest of box but misses the blood on the inside of the box where the horses can see and smell

Horse 38 – 11-year-old Belgian mare, 18.1HH

EID Owner's address is illegible (on original), EID does not note markings on legs, EID Primary Location not filled in, EID owner using phone number of agent.

EQUINE INFORMATION DOCUMENT (EID)																																							
☐ Overall Attachment ☐ Pictures (all four sides) ☐ Pedigree Tag/Papers		OWNER'S NAME: FULL ADDRESS: PHONE NUMBER: PRIMARY LOCATION OF ANIMAL: PRIMARY USE OF ANIMAL: SEX: AGE:																																					
CLAIMED: The picture shall not be required if: Lines are to be drawn for the diagrams representing white areas on the animal where applicable with red pen or black ink. IF AN OFFICIAL PASSPORT, THE PASSPORT MAY BE ATTACHED.		LIST VISIBLE ACQUIRED MARKS: (brands, tattoos, scars, etc... & location) PICTURE: Attach by gluing to this document a clear printed color picture showing each of the views in the diagram of the animal in this document. The picture should be large enough to see the details required. Two views shall be printed on a standard 8 1/2 x 11" page. Owners sign and date the picture. I, I am the owner of the animal described on this document and have had uninterrupted possession, care at control of the animal: Date: to date: Signature: If there are drugs or vaccines taken administered to or consumed by the animal during the last 180 days or during the time you owned the animal? CYes CNo If YES, write the name of the drug(s) or vaccine(s), test date of use, withdrawal period for drugs, amount used (weight per treatment) if the label does not estimate a dose or if drugs is used a dosage different than the label indicates on the back side of the page. I, has the animal described on this document been diagnosed with an illness during 180 days or during the time you owned the animal? CYes CNo If YES, provide details with dates of diagnosis and recovery on the back side of the page. I, has the animal described on this document as your knowledge been traded with a subtitle brand under the name registered business not permitted for use or food processing before found in section E.5.A.Cing the last 180 days or during the time you owned the animal? CYes CNo OWNER DECLARATION: As the owner of the animal identified on this document I hereby certify that the information in this EID is accurate and complete. Understanding that, effective July 31, 2015, at least six continuous months of documented accessible history is required for an equine presented for processing in an establishment inspected by CFIA. I always treated the animal with respect and care to meet the needs. Date: Signature: to back																																					
For most examination on the left side of marks around the horses' body		Body Color (check the correct box) <table border="0" style="width: 100%;"> <tr> <td>☐ Black</td> <td>☐ Brown</td> <td>☐ Blue Roan</td> <td>☐ Red Roan</td> </tr> <tr> <td>☐ Bay</td> <td>☐ Bay - Brown</td> <td>☐ Painted</td> <td>☐</td> </tr> <tr> <td>☐ Chestnut</td> <td>☐</td> <td>☐ Appaloosa</td> <td>☐</td> </tr> <tr> <td>☐ Liver chestnut</td> <td>☐</td> <td>☐ Grey</td> <td>☐</td> </tr> <tr> <td>☐ Dark chestnut</td> <td>☐</td> <td>☐ Strawberry</td> <td>☐</td> </tr> <tr> <td>☐ Light chestnut</td> <td>☐</td> <td>☐ Dun</td> <td>☐</td> </tr> <tr> <td>☐ White</td> <td>☐</td> <td>☐ Cream</td> <td>☐</td> </tr> <tr> <td>☐ Chestnut or Silver with a silver mane and tail</td> <td>☐</td> <td>☐ Highland blue & white</td> <td>☐</td> </tr> <tr> <td>☐</td> <td>☐</td> <td>☐ Shetland (all other color combinations)</td> <td>☐</td> </tr> </table>		☐ Black	☐ Brown	☐ Blue Roan	☐ Red Roan	☐ Bay	☐ Bay - Brown	☐ Painted	☐	☐ Chestnut	☐	☐ Appaloosa	☐	☐ Liver chestnut	☐	☐ Grey	☐	☐ Dark chestnut	☐	☐ Strawberry	☐	☐ Light chestnut	☐	☐ Dun	☐	☐ White	☐	☐ Cream	☐	☐ Chestnut or Silver with a silver mane and tail	☐	☐ Highland blue & white	☐	☐	☐	☐ Shetland (all other color combinations)	☐
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Tag number		Export Tag Number																																					
Slaughter serial #		Buyer ID (batch number)																																					



04:10 Large Belgian mare comes into the stun box while drover yells "Hup! Hup!" (4 white stickers, 2 oval stickers - white or USDA green?: 000 and 3741; white square sticker: 523)

04:24 Shooter says to horse: "Hey, whoa, whoa"

04:30 Horse is head shy, repeatedly turning her head away from the captive bolt pistol

04:43 She is shot with captive bolt pistol and falls (audio lag)

04:48 She's shot a **second** time on the top of the head to the right

04:58 She's shot a **third** time on the top of the head to the left; horse bounces up with impact

05:17 Side of stun box is lifted

08:48 Shooter hoses down stun box

Horse 39 – 12-year-old Belgian gelding, 19HH

EID Primary Location not filled in, EID owner is using phone number of agent.

EQUINE INFORMATION DOCUMENT (EID)

OWNER'S NAME: Steve Landman
 FULL ADDRESS: 5410 E. 4th St. #119
 PHONE NUMBER: 330-460-3151
 PRIMARY LOCATION OF ANIMAL: USA
 PRIMARY USE OF ANIMAL: Pet
 SEX: Male AGE: 12

LIST VISIBLE ACQUIRED MARKS:
 (brands, tattoos, scars, etc... & location)

PICTURE: Attach by sealing to this document a clear printed color picture showing each of the views in the diagram of the animal in this document. The picture should be large enough to see the details required. The views shall be printed on a standard 8.5"x11" page. Owners sign and date the picture.

1. I grant the owner of the animal identified on this document and have had uninterrupted possession, care or control of the animal:
 From date 9-1-2016 to date 2-9-2017

2. Have any drugs or vaccines been administered to or contracted by the animal during the last 180 days or during the time you owned the animal?
 If YES: write the name of the drug(s) or vaccine(s), and date of use, withdrawal period for drugs, amount used (dose), and frequency. If the owner does not indicate a dose or if drugs or vaccines are used a dosage different than the label indicated on the back side of this page.
 If YES: None ☒ Yes ☐ No

3. Has the animal identified on this document been diagnosed with an illness during 180 days or during the time you owned the animal?
 If YES: write the name of the illness and the name of the veterinarian who diagnosed the illness. If YES: None ☒ Yes ☐ No

4. OWNER DECLARATION: In the power of the animal identified on this document, I hereby certify that the information on this EID is accurate and complete.
 I understand that, effective July 27, 2015, at least 60 continuous months of documented ownership history is required for an equine identified for processing in an endorsement program by CHTS.
 Always transfer the animal with required documents to meet the program.

Signature: Steve Landman Date: 2-9-2017

TRANSPORT AGENT DECLARATION (COUNTRIES): This animal identified on this document has been under my care and control from 2-9-2017 (date) to 2-9-2017 (date). During this time period the individual animal has not been given or fed drugs or vaccines and has not shown any signs of disease.

Name of Agent: Steve Landman
 Address: 5410 E. 4th St. #119
 Phone Number: 330-460-3151
 Signature of Agent: Steve Landman

Buyer ID (batch number)
 # of horses shipped
 Tag number: 330-117
 Export Tag Number: 3351
 Slaughter serial #



- 33:21 Large Belgian gelding with a short mane haltingly enters the stun box to the screaming of the drover "HEY! HUP!"; horse backs out again. Can hear the drover yelling "HEY! HEY! HEY!", then "GIT! GIT!"
- 33:39 Sound of pawing heard
- 33:52 Can hear worker saying "Get in there"
- 33:56 Can hear what sounds to be whipping
- 34:15 Worker with coffee mug moves to around front of stun box attempting to draw horse to him with hand outstretched
- 34:30 Worker digs in garbage bin, grabs a rag and attempts to entice horse with it but only succeeds in worrying the horse more
- 34:40 Horse is continually being urged from behind, inches way into stun box, is unsteady on his feet
- 34:49 Can now see white auction sticker number 119 and green kill-only USDA sticker: 3751
- 34:50 Horse is shot with captive bolt pistol, jumps and falls to left side (audio lag)
- 34:56 Horse is shot a **second** time, aggressively and on poll, horse slides down into stun box
- 35:05 Horse can be heard thrashing on the floor of the stun box; workers can be heard yelling, shooter pretends to throw himself into the stun box and smiles, meanwhile, the workers can be heard yelling over the thrashing of the horse
- 35:12 Horse is apparently still thrashing as he lies on the floor of the box
- 35:18 Finally he's quiet
- 35:19 Side of stun box is lifted by shooter
- 35:23 Shooter goes into suspending/butchering area

EID Primary Location not filled in, EID owner using phone number of agent.

02:50 A 3-year-old Clydesdale enters stun box (green kill-only USDA sticker: 3753)

2:51 Horse puts head down to sniff bloody stun box

3:02 Horse's knees buckle and he stumbles in stun box

3:04 Horse looks into suspending/butchering area

3:15 Horse is head shy and continually turns head to avoid captive bolt pistol

3:31 Horse is shot with captive bolt pistol; extremely poorly placed, grazes off horse's right ear

3:38 Shooter says: "Sorry, good girl." He is still standing

3:42 Horse turns head and looks back to move head as far away from shooter as possible, can see red line where bolt skinned across

3:48 Shooter takes **second** shot, incorrectly aimed too far to the right

3:55 Shooter takes a **third** shot on the horse's poll as the horse is down in the head stanchion

4:09 Side of stun box is lifted, horse slides through; a large amount of blood is left behind in the chin rest

Horse 43 – 13-year-old Belgian gelding, 18.3HH

EID does not note markings on legs, EID photo shows a blaze not a stripe.

EQUINE INFORMATION DOCUMENT (EID)



Height to Hocks: 18.3
(1 hand = 4 inches)

Optional Attachments:
☐ Pictures (all four sides)
☐ Pedigree Reg Papers

DRAWING (the picture shall not be required if): Lines are to be drawn on the diagrams representing white areas on the animal where applicable with red pen for the others with black pen. Mark whole with an "X". Mark the location of ears with an "X". If an official passport, the passport may be attached. Attached EID from the previous owner(s).

For more explanation on the color terms or marks, consult the internet site: <http://www.inspection.gc.ca/equine/eid/eidmain.asp>

Body Color (check the correct box)

☐ Black	☐ Brown	☐ Buck Robin	☐ Red Robin
☐ Bay	☐ Bay - Brown	☐ Palomino	☐ Appaloosa
☐ Chestnut	☐ Liver chestnut	☐ Grey	☐ Strawberry
☐ Dark chestnut	☐ Light chestnut	☐ Dun	☐ Cream
☐ Sorrel	☐ Chestnut or Sorrel with a fawn mane and tail	☐ Piebald (black & white)	☐ Bluebald (all other color combal)

Head markings (check the correct box)

☐ Star	☐ Blaze	☐ Snip	☐ White muzzle
☐ Stripe	☐ White face	☐ Fleck mark	

Coat markings (check the correct box)

☐ Grey ticked	☐ Patch (colour, shape, position, extent)	☐ Zebra mane	☐ Withers stripe
☐ Flecked		☐ Zebra mane	☐ Withers stripe
☐ Black marks or dark marks		☐ Leopard	☐ Lil

Limb markings

White patch on coronet	Right Foreleg	Left Foreleg	Right Hind Leg	Left Hind Leg
Anterior				
Lateral				
Medial				
Posterior				
Side coronet				
Side pastern				
Side fetlock				
Side to knee				
Side to hock				
Side to hock/garret				

OWNER'S NAME: _____

FULL ADDRESS: _____

PHONE NUMBER: _____

PRIMARY LOCATION OF ANIMAL: _____

PRIMARY USE OF ANIMAL: FARM

SEX: Gelding **AGE:** 13

LIST VISIBLE ACQUIRED MARKS: (brands, tattoos, scars, etc.... & location)

PICTURE: Attach by stapling to this document a clear printed color picture showing each of the views in the diagram of the animal in this document. The picture should be large enough to see the details required. The views shall be printed on a standard 8.5"x11" page. Owners sign and date the picture.

1. I am the owner of the animal identified on this document and have had uninterrupted possession, care or control of the animal.
 From date 1-9-2006 to date 7-4-2011

2. Have any drugs or vaccines been administered to or consumed by the animal during the last 180 days or during the time you owned the animal? ☐ Yes ☒ No

If YES: Write the name of the drug(s) or vaccine(s), last date of use, withdrawal period for drugs, amount used (dose) per treatment if the label does not indicate a dose or if drugs is used a dosage different than the label indicates on the back side of this page.

3. Has the animal identified on this document been diagnosed with an illness during 180 days or during the time you owned the animal? ☐ Yes ☒ No

If YES: Provide details with dates of diagnosis and recovery on the back side of the page.

4. Has the animal identified on this document to your knowledge been treated with a substance listed under the table named substances not permitted for use in food processing equine found in section E.5 during the last 180 days or during the time you owned the animal? ☐ Yes ☒ No

5. OWNER DECLARATION: As the owner of the animal identified on this document I hereby certify that the information in this EID is accurate and complete.

I understand that, effective July 31, 2010, at least six continuous months of documented acceptable history is required for an equine presented for processing in an establishment inspected by CFIA.

I always treated the animal with respect and care to meet the needs.

Date: 7-4-2011 Signature: _____

TRANSIENT AGENT DECLARATION(S): This animal identified on this document has been under my care and control from 1-9-2006 (date) to 7-4-2011 (date). During this time period the identified animal has not been given or fed drugs or vaccines and has not shown any signs of illness.

Name of Agent: STEVE LAMFRED
 Address: 7446 MILL BROS RD SHIRAZ, ON
 Phone Number: 330-465-5141
 Signature of Agent: _____

Buyer ID (batch number) _____
 # of horses shipped _____
 Tag number 012, 134
 Export Tag Number 3748
 Slaughter serial # _____



- 07:21 Another large Belgian comes part way into box then backs out
 07:28 Drover can be heard yelling "HEY! GO! GIT! HEY! H'YA!" as horse comes back into box
 07:31 Drover yells "JESUS CHRIST!"
 07:37 Belgian gelding comes into the still bloody stun box with continued yelling by drover (white auction sticker: 134, green kill-only USDA sticker: 3748); he tries to back out again
 07:47 He's trembling, knees are buckling, having difficulty remaining standing
 07:54 Horse is shot with captive bolt pistol; incorrectly placed too high and to the right, horse flails, legs moving rapidly
 08:01 Horse is shot a **second** time; incorrectly placed at the horse's poll
 08:09 Horse is shot a **third** time again incorrectly placed at the horse's poll, almost at base of horse's brain
 08:20 Horse convulses and shakes his head, shooter looks to be ready to give a **fourth** shot
 08:32 Shooter moves past front of horse who appears to flinch at some noise
 08:35 Side of stun box raised, horse partially slides down into stun box
 08:40 Shooter grabs the horse's muzzle and grunts while pushing the horse's head down into the stun box
 08:42 Horse's ears can be seen flicking while he's down in the box
 08:52 Can see shooter pulling horse through with a crashing noise

Horse 46 – 14-year-old draft gelding, 18HH

EID Primary Location not filled in, EID owner using phone number of agent, owner's signature and agent's signature look very similar (on original photo).

EQUINE INFORMATION DOCUMENT (EID)

OWNER'S NAME: STEVE LANDFAIR
 FULL ADDRESS: 2100 S. 10th St. S. SHERVE, IA 52081
 PHONE NUMBER: 563-440-5747
 PRIMARY LOCATION OF ANIMAL: FARM - R-4334
 PRIMARY USE OF ANIMAL: FARM - R-4334
 SEX: MALE AGE: 14

LIST VISIBLE ACQUIRED MARKS:
 (brands, tattoos, scars, etc.... & location)

PICTURE: Attach by stapling to this document a clear printed color picture showing each of the views in the diagram of the animal in this document. The picture should be large enough to see the details required. The views shall be printed on a standard 8.5"x11" page. Owners sign and date the picture.

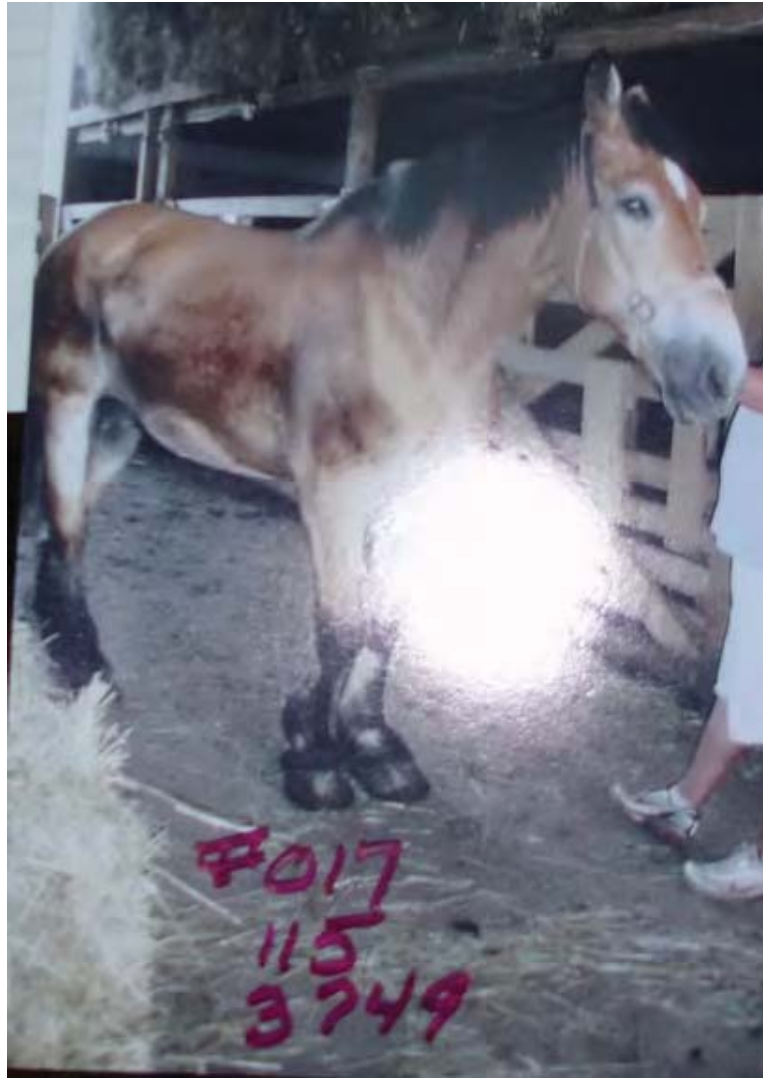
1. I am the owner of the animal identified on this document and have had uninterrupted possession, care or control of the animal.
 From date 6-18-2008 to date 7-9-2011
 2. Have any drugs or vaccines been administered to or consumed by the animal during the last 180 days or during the time you owned the animal? YES NO
 IF YES, write the name of the drug(s) or vaccine(s), last date of use, withdrawal period for drugs, amount used (dosage per treatment if the label does not indicate a dose or if drugs are used a dosage different than the label indicates on the back of the package).
 3. Has the animal identified on this document been diagnosed with an illness during 180 days or during the time you owned the animal? YES NO
 IF YES, provide details with dates of diagnosis and recovery on the back side of the page.
 4. Has the animal identified on this document to your knowledge been treated with a substance listed under the label marked as not permitted for use in food processing equine found in section E-5 during the last 180 days or the time you owned the animal? YES NO

A. OWNER DECLARATION: As the owner of the animal identified on this document I hereby certify that the information in this EID is accurate and complete.
 I understand that, effective July 31, 2010, at least six continuous months of documented acceptable history is required for equine presented for processing in an establishment inspected by CFIA.
 I always treated the animal with respect and care to meet the needs.
 Date: 7-9-2011 Signature: Steve Landfair

TRANSIENT AGENT DECLARATION(S): This animal identified on this document has been under my care and control from 7-9-2011 (date) to 7-9-2011 (date). During this time period the identifiable animal has not been given or fed drugs or vaccines and has not shown any signs of illness.

Name of Agent: STEVE LANDFAIR
 Address: 2100 S. 10th St. SHERVE, IA 52081
 Phone Number: 563-440-5747
 Signature of Agent: Steve Landfair

Buyer ID (batch number) _____
 # of horses shipped _____
 Tag number 017, 113
 Export Tag Number 3749
 Slaughter serial # _____



23:56 Bay draft is urged into still-bloody stun box (3 white tags, round green kill- only USDA sticker: 3749 and white auction sticker: 115)

24:13 Horse is shot with captive bolt pistol and falls

24:18 Horse is shot a **second** time with captive bolt pistol; inaccurately placed on poll

24:27 Horse is shot a **third** time with captive bolt pistol while his ears were turning back; horse's body jumps with the shot again on top of head at the poll

24:33 Horse is shot a **fourth** time; this shot is violent and forceful; horse's body jumps higher with the shot, horse not going limp

24:50 Side of stun box is lifted, horse slides through leaving a great deal of blood behind

Horse 57 – 15-year-old buckskin gelding, 16HH
EID owner using phone number of agent

823

EQUINE INFORMATION DOCUMENT (EID)

Height in Hands
(1 hand = 4 inches)

Optional Attachments
P Pictures (all four sides)
P Performance Record Pages

Tag #:
Auction:
USDA:

DRAWING (the picture shall not be required if): Lines are to be drawn on the diagrams representing white areas on the animal where applicable with red or blue pen or the others with black pen. Mark whorls with an "X". Mark the location of scars with an "X".

Body Color (check the correct box)

☐ Black	☐ Brown	☐ Grey	☐ Red Roan
☐ Bay	☐ Bay - Brown	☐ Palomino	☐ Buck skin
☐ Chestnut	☐ Liver chestnut	☐ Blue Roan	
☐ Dark chestnut	☐ Light chestnut	☐ Strawberry	
☐ Sorrel	☐ Chestnut or Sorrel	☐ Dun	
☐ with a flaxen mane and tail	☐ Piebald (black & white)	☐ Cream	
☐ Blood	☐ Skewbald (all other color combos)		

Head markings (check the correct box)

☒ Star	☐ Blaze	☐ Snip	☐ White muzzle
☐ Stripe	☐ White face	☐ Fleck mark	☐ None

Coat markings (check the correct box)

☐ Grey ticked	☐ Patch (colour, shape, position, extent)
☐ Flecked	☐ Zebra marks
☐ Black or Dark marks	☐ Withers stripe
☐ Leopard	☐ List

Limb markings (check the correct box)

Right Foreleg	Left Foreleg	Right Hind Leg	Left Hind Leg
---------------	--------------	----------------	---------------

White patch on coronet:
A: Anterior, L: Lateral
P: Posterior, M: Medial

White coronet
White pastern
White fetlock
White to knee
White to hock
White to hind quarter
White to hoof point

picture attached no need to fill the left side of this document
right side must be filled out completely, if information not known, write not known in the cell

OWNER'S NAME: Michael J. Smith

FULL ADDRESS: Box 4578, Sugar Creek, OH 45151

PHONE NUMBER: 330-552-2632

PRIMARY LOCATION OF ANIMAL: ☐ Not available ☒ Same as above

PRIMARY USE OF ANIMAL: ☐ Recreation ☐ Work ☐ Breeding

SEX: ☐ Mare ☒ Gelding ☐ Stud **AGE:** 15

LIST VISIBLE ACQUIRED MARKS: (brands, tattoos, scars, etc.... & location) Height in hands: 16.2

NOTE: Markers by listing in this document a clear photo color picture showing the location of the diagram of the animal in this document. The picture should be large enough to see the details required. The views shall be printed on a standard 8.5"x11" paper. Owners date and sign the picture.

I have any drugs or vaccines been administered to or consumed by the animal during the last 180 days or during the time you owned the animal? ☐ Yes ☒ No

If YES, write the name of the drug(s) or vaccine(s), last date of use, withdrawal period, lot number, amount used (dose) per treatment if the label does not indicate a dose or if drugs is used a dosage different than the label indicates on the back side this page.

I have the animal identified on this document been diagnosed with an illness during 180 days or during the time you owned the animal? ☐ Yes ☒ No

If YES, provide details with date of diagnosis and recovery on the back side of the page.

I have the animal identified on this document to your knowledge been in contact with a disease listed under the table named substances not permitted for use in food processing during the last 180 days or during the time you owned the animal? ☐ Yes ☒ No

OWNER DECLARATION:
I am the owner of the animal identified on this document and have had uninterrupted possession, care or control of the animal.

From 12-24-10 TO 7-8-11

As the owner of the animal identified on this document I hereby certify that the information in this EID is accurate and complete. I understand that, effective July 31, 2010, at least six continuous months of documented acceptable history is required for an equine presented for processing in an establishment inspected by CFIA.

I always treated the animal with respect and care to meet the needs: no black ink.

Signature: Michael J. Smith

TRANSIENT AGENT DECLARATION: (If the animal identified on this document has been under my care and control)

SUGARCREEK LIVESTOCK AUCTION INC.
P.O. BOX 457
102 BUCKEYE STREET
SUGARCREEK, OHIO 45151
PHONE 330-552-2632

From 7-8-11 TO 7-11-11

Name of agent: SUGARCREEK LIVESTOCK AUCTION INC.

Address: 102 BUCKEYE STREET

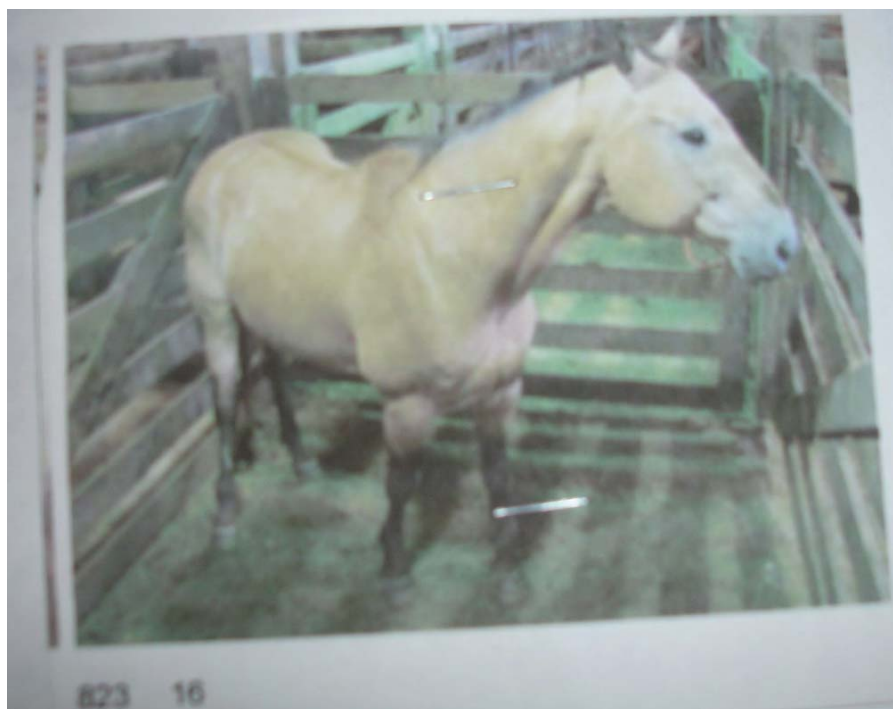
Phone number: 330-552-2632

During the same period the agent listed animal has no drugs or vaccines and has not been in contact with a disease.

Signature of Agent: Michael J. Smith

Tag number: 823 **2nd TAG:** 3800

EID verified: ☒ **Approved:** ☒



- 28:32 Shooter tries luring in next horse
- 28:39 Horse does not want to enter; shooter tries to entice horse (buckskin Quarter Horse) into entering the stun box by holding out a rag from the garbage
- 29:11 Shooter throws towels back into garbage and uses baby talk to try to encourage horse into the chute
- 29:30 Shooter gets help from the drover
- 29:41 Can hear sounds of shod hooves
- 30:00 Buckskin horse, likely a Quarter Horse, enters then quickly backs up again (green kill-only USDA sticker: 3800)
- 30:10 Drover yells loudly "HEY! HUP! HA!"
- 30:17 Horse raises head and looks out open top left side of stun box
- 30:30 Horse is trembling, feet spinning on stun box floor
- 30:50 Horse is shot with the captive bolt pistol
- 30:55 Horse is shot a **second** time, can see left eye blink as shooter comes fast with captive bolt gun, body jumps
- 30:57 Second shot has reverse effect, horse on feet, moving and convulsing after shot
- 31:00 Horse is convulsing violently in box, blood pouring out of his head
- 31:15 He finally sinks to the floor but does not appear to be unconscious as his ears are still pricked up and his throat is moving
- 31:15 Side of stun box is lifted regardless

VIDEO 11112847

Horse 60 – 3-year-old possible Standardbred, 14.2HH

EID lists two different heights – 15 and 14.2HH

Accompanying photo lists height as 14.2HH

EQUINE INFORMATION DOCUMENT (EID)

834

OWNER'S NAME: Camryn
 FULL ADDRESS: 102 Burgave Street, SUGARCREEK, ONT L4A 0G1
 PHONE NUMBER: 905-882-4375
 PRIMARY LOCATION OF ANIMAL: ☐ Same as above
 PRIMARY USE OF ANIMAL: ☐ Recreation ☐ Work ☐ Breeding
 SEX: ☒ Male ☐ Female ☐ Stud ☐ Gelding ☐ Mare ☐ Foal ☐ Yearling ☐ Adult
 AGE: 3 years
 LIST VISIBLE ACQUIRED MARKS: (brands, tattoos, scars, etc... & location) Height in hands: 14.2

DRAWING (the picture shall not be required if) - Lines are to be drawn on the diagrams representing white areas on the animal where applicable with red or blue pen the others with black pen. Mark whorls with an "X". Mark the location of scars with an "X".

For more explanation on the color terms or marks, consult the Web site: <http://www.equineinfo.ca/canadian/eid/eid.htm>

Body Color (check the correct box):
☒ Bay ☐ Brown ☐ Grey ☐ Red Roan
☐ Chestnut ☐ Bay - Brown ☐ Palomino ☐ Buck skin
☐ Liver chestnut ☐ Blue Roan ☐ Appaloosa
☐ Dark chestnut ☐ Strawberry ☐ Cream
☐ Light chestnut ☐ Dun ☐ Piebald (black & white)
☐ Sorrel ☐ Skewbald (all other color combos)
☐ Chestnut or Sorrel with a flaxen mane and tail
☐ Blond

Head markings (check the correct box):
☒ Star ☐ Blaze ☐ Snip ☐ White muzzle
☐ Grey ticked ☐ White face ☐ Flecked ☐ None

Coat markings (check the correct box):
☐ Grey ticked ☐ Flecked ☐ Zebra marks
☐ Black or Dark marks ☐ Withers stripe
☐ Leopard ☐ List ☐ None

Limb markings (check the correct box):
 Right Foreleg ☐ Left Foreleg ☐ Right Hind Leg ☐ Left Hind Leg

Transient Agent Declaration(s): The animal identified on this document has been under my care and control
 SUGARCREEK LIVESTOCK AUCTION INC.
 From 7/8/11 to 07/08/11
 Name of agent: SUGARCREEK, ONT L4A 0G1
 Address: PHONE 330-852-2832
 Phone number:
 Signature of Agent: Camryn
 Tag number 834 2nd TAG 3813



12:09 Small bay mare, possibly a Standardbred, enters stun box slowly (EID shows auction tag 834, green kill only USDA sticker: 3812)

12:20 She sniffs around and is visibly shaking

12:26 She is frightened and nervously looking around, loud clanging noises can be heard

12:40 She looks into suspending/butchering area

12:42 She's head shy, continually turning head away from captive bolt pistol

12:47 She's shot with captive bolt pistol, can see whites of the her eyes as she looks back. She's shot while looking to left

13:04 Her eyes appear to be moving after the first shot as her body slides down the stun box

13:04 She is shot a **second** time. A great deal of blood is seen on her forehead. Captive bolt pistol appears to get stuck in her head and has to be forcefully pulled out.

She is trembling as she slides down into the box

13:22 A profuse amount of blood is left behind in the chin lift of the stanchion

13:35 She's pulled into bleed out room

14:10 Sound of saws starting up again is heard. She was only shot around a half minute or so before the saws started up again.

Horse 63 – Bay Horse



- 34:35 Bay with straw in his/her mane very slowly enters stun box
- 34:57 Horse is nervously looking around, twitching
- 35:09 Horse is flinching, noticeably flinches when someone coughs
- 35:09 Horse is shot with captive bolt and starts kicking and convulsing
- 35:16 Horse is shot a **second** time, falls down into stun box
- 35:30 A person wearing a white hard-hat enters to look into the stun box
- 35:35 The shooter lifts the face of the horse to look into it
- 35:42 The shooter slaps face of horse while opening the door (First time this behaviour is observed from the shooter)
- 36:03 Horse pulled through
- 36:05 Individual in white hat leaves



- 12:03 Large, aged, bay with stripe comes quickly in to stun box (green kill-only USDA sticker: 3817)
- 12:15 Horse stares into suspending/butchering area for 20 seconds, until 12:35
- 12:35 Horse is shot while looking into bleed out room but angle is incorrect and placed too far to the right, horse sways, ears are still forward
- 12:40 Horse is shot a **second** time; again shot too high and on the right
- 12:41 Horse is starting to move, trying to right himself, then slides down
- 12:59 Shooter grabs and shakes muzzle of horse
- 13:03 Side of stun box is lifted, horse's head snaps back as he slides under
- 13:19 Horse is pulled through stun box door

Horse 71 – 2-year-old Paint gelding, 15HH

840

EQUINE INFORMATION DOCUMENT (EID)



Height in Hands: (1 hand = 4 inches)

Tag #: _____ Auction: _____

Optional Attachments: ☐ Pictures (all four sides) ☐ Pedigree Back Papers

USDA: _____

DRAWING (the picture shall not be required if): Lines are to be drawn on the diagrams representing white areas on the animal where applicable with red or blue pen the others with black pen. Mark whorls with an "X". Mark the location of scars with an "X".

OWNER'S NAME: _____

FULL ADDRESS: _____

PHONE NUMBER: _____ ☐ Not available

PRIMARY LOCATION OF ANIMAL: ☒ Same as above ☐ Not available

PRIMARY USE OF ANIMAL: ☒ Recreation ☐ Work ☐ Breeding

SEX: ☐ Mare ☒ Gelding ☐ Stud **AGE:** 2

LIST VISIBLE ACQUIRED MARKS: _____

(brands, tattoos, scars, etc...& location) Height in hands: 15

1. Have any drugs or vaccines been administered to or consumed by the animal during the last 180 days or during the time you owned the animal? ☐ Yes ☒ No

If YES: Write the name of the drug(s) or vaccine(s), last date of use, withdrawal period for drugs, amount used (dose) per treatment if the label does not indicate a dose or if drugs is used a dosage different than the label indicates on the back side this page.

2. Has the animal identified on this document been diagnosed with an illness during 180 days or during the time you owned the animal? ☐ Yes ☒ No

If YES: provide details with dates of diagnosis and recovery on the back side of the page.

3. Has the animal identified on this document to your knowledge been treated with a substance listed under the table named substances not permitted for use in food processing equine found in section E.5 during the last 180 days or during the time you owned the animal? ☐ Yes ☒ No

4. OWNER DECLARATION:
I am the owner of the animal identified on this document and have had uninterrupted possession, care or control of the animal:

From 06/12/2010 TO 07/08/2011

As the owner of the animal identified on this document I hereby certify that the information in this EID is accurate and complete. I understand that, effective July 31, 2010, at least six continuous months of documented acceptable history is required for an equine presented for processing in an establishment inspected by CFIA.

I always treated the animal with respect and care to meet the needs, no black ink

Signature: _____

TRANSIENT AGENT DECLARATION(S): The animal identified on this document has been under my care and control

SUGARCREEK LIVESTOCK AUCTION INC.
P.O. BOX 452
1102 BUCKEYE STREET
SUGARCREEK, OHIO 44661
PHONE 330-852-2832

From 7/8/11 TO 11/11/11

Name of agent: _____
Address: _____
Phone number: _____



16:45 Young Paint horse with white stripe in mane



17:15 He stares into suspending/butchering area

17:20 He is shot with captive bolt pistol; can hear squeaking of his sweaty coat against the metal sides of the stun box as he slides down. Ears are still erect, though

17:26 He's shot a **second** time, hear more squeaking

17:28 Can see what appears to be a cold branded capital letter S on right side of his neck

17:40 Shooter partially opens door to bleed out room

17:45 Horse falls down, white face spattered with blood; shooter sprays chin rest while horse's head is still in view spraying the horse's face



18:00 Horse appears to have voluntary movement of his head

18:10 Horse is pulled through into suspending/butchering area

VIDEO 11143118

Horse 96

This horse is seen in the video "Pasture to Plate".



- 22:51 Chestnut horse with flaxen mane (green kill-only USDA sticker: 9437)
- 23:00 Horse is head shy, repeatedly turns face away from captive bolt pistol
- 23:18 Horse appears to be having difficulty remaining standing, trips and slips
- 23:20 Both head and feet of horse are moving frantically
- 23:23 Horse pushes his/her head through the curtain to stare into the suspending/butchering area; frantically darts eyes around
- 23:33 Continues staring into the suspending/butchering area
- 23:34 There's a discussion about the horse with some laughter. The shooter seems to have put down the captive bolt pistol
- 23:36 Horse again pushes nose through curtain to stare into the suspending/butchering area
- 23:37 Shooter goes into suspending/butchering area
- 23:45 Horse attempts to jump out of stun box
- 23:49 Horse starts to become frantic, attempts to rear, looks again into suspending/butchering area
- 23:55 The drover comes in
- 23:56 Drover shoots the horse while horse is looking into suspending/butchering area; appears to be an incorrect angle
- 24:03 Drover shoots the horse a **second** time, does so extremely aggressively with lips pursed
- 24:13 Drover waves "Bye-Bye!" into horse's face and lifts side of stun box
- 24:24 Drover pulls lever that slams against the horse's head
- 24:31 Potential CFIA inspector leans over and looks in at the horse falling down into the stun box
- 24:34 Can see face of potential CFIA inspector
- 24:45 Horse is pulled through

Colour Key

Red	Inaccurate hit, horse remains conscious
Purple	Horse shows signs of fear
Green	Horse slips and falls
Blue	Horse vocalizing from fear
Brown	Horse Shows signs of injury, infection or illness
Orange	CFIA present

THURSDAY, JULY 14, 2011

VIDEO 11074922

Horse 8

This horse is seen in the video "Pasture to Plate".



- 25:45 Tall chestnut horse with a flaxen, partially shaved mane enters still-bloody stun box, looking back with whites of eyes showing
- 25:57 Whinnying (sounds like horse next in line)
- 26:01 Horse sniffs stun box, looking around, keeping head low
- 26:03 Whinnying
- 26:05 Whinnying
- 26:07 Whinnying
- 26:09 Horse falls repeatedly until 26:36 (shot appears edited but is not, camera skipped because of movement in stun box. Look at shooter for perspective)
- 26:41 Horse is head shy, repeatedly turning face away from captive bolt pistol
- 26:46 Horse is shot with captive bolt pistol (audio lag)
- 27:04 Side of stun box is raised, horse falls through
- 30:35 Side of stun box is raised, horse falls through, flaccid

VIDEO 11090227

Horse 29

03:43 Chestnut slowly enters stun box; appears to have something wrong with left eye (enlarged eye with discharge)

03:51 Horse is urged into the stun box the rest of the way; is jittery

03:59 Horse is shot with captive bolt pistol and falls, convulsing

04:15 Side of stun box is raised

04:17 Shooter hoses down the stun box while the horse is still in it on floor



Horse 29 with enlarged, possibly infected left eye

VIDEO 11101527

Horse 54

This horse is seen in the video "Pasture to Plate".



- 14:44 Nervous bay horse enters stun box, twitchy, eyes darting
- 15:06 Horse is head shy and repeatedly turns face to avoid captive bolt pistol
- 15:16 Horse is shot with captive bolt pistol and lunges forward
- 15:17 Just-shot, the horse whinnies and convulses
- 15:24 Shooter attempts to shoot horse a second time but bolt does not discharge
- 15:26 Horse is shot a **second** time; inaccurately placed on poll
- 15:27 Horse whinnies again
- 15:35 Shooter talks to horse in baby-talk, difficult to hear
- 15:41 Horse slumps down into the stun box
- 15:43 Side of stun box raised, horse falls through

Horse 57

This horse is seen in the video "Pasture to Plate"



- 21:16 Terrified chestnut horse is being urged into the stun box; can hear drover: "HEY! UP! Come on!"
- 21:21 Horse is thrashing in stun box so violently the film appears to skip
- 21:34 Horse is frantic, resisting moving forward but continually being pushed; twitching
- 21:35 Horse is shot with captive bolt pistol and falls (audio lag)
- 21:47 Side of stun box is raised
- 22:04 Horse is pulled through

- 27:29 Side of stun box is raised, horse falls through

Horse 60

- 28:30 Large black and white Paint enters stun box, chin lift has pooled blood from previous horse
- 28:45 Horse is shot with captive bolt pistol while horse looking into suspending/ butchering area when shot



Horse 60 hit with the first shot.

28:50 Shooter tries to shoot the horse a **second** time into left temple but the bolt does not appear to discharge, horse appears to flinch from the touch of it



Horse 60 shot a second time under left ear.

28:55 Horse is hit a **third** time in same inappropriate location - under left ear - bolt discharges this time horse again appears to flinch at touch



Horse 60 shot a third time.

- 29:00 Horse's body appears to be very rigid and starts to sink to floor
- 29:03 Wall of stun box is raised
- 29:26 Horse is pulled through
- 30:27 Whistling is heard
- 31:06 Shooter emerges from suspending/butchering area with a larger size captive bolt pistol which is covered in blood. He hoses the blood off of it.
- 31:15 Shooter returns just-hosed-off captive bolt pistol to suspending/butchering area
- 31:28 Shooter carries another captive bolt pistol back from the suspending/butchering area and places it on a shelf near the stun box

APPENDIX A

<http://laws-lois.justice.gc.ca/eng/regulations/sor-90-288/FullText.html>



CANADA

CONSOLIDATION

CODIFICATION

Meat Inspection Regulations, 1990

Règlement de 1990 sur l'inspection des viandes

SOR/90-288

DORS/90-288

Current to September 21, 2011

À jour au 21 septembre 2011

Last amended on July 30, 2009

Dernière modification le 30 juillet 2009

Published by the Minister of Justice at the following address:
<http://laws-lois.justice.gc.ca>

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<http://lois-laws.justice.gc.ca>

APPENDIX A (cont'd)

<http://laws-lois.justice.gc.ca/eng/regulations/sor-90-288/FullText.html>

SOR/90-288 — September 21, 2011

79. Every food animal that is slaughtered shall, before being bled,

(a) be rendered unconscious in a manner that ensures that it does not regain consciousness before death, by one of the following methods:

(i) by delivering a blow to the head by means of a penetrating or non-penetrating mechanical device in a manner that causes immediate loss of consciousness,

(ii) by exposure to a gas or a gas mixture in a manner that causes a rapid loss of consciousness, or

(iii) by the application of an electrical current in a manner that causes immediate loss of consciousness; or

(b) be killed by one of the methods set out in paragraph (a) or, in the case of a bird or a domesticated rabbit, by rapid decapitation.

SOR/93-160, s. 9; SOR/99-369, s. 4.

80. No equipment or instrument for restraining, slaughtering or rendering unconscious any food animal shall be used by any person for those purposes

(a) unless the person is, by reason of the person's competence and physical condition, able to do so without subjecting the animal to avoidable distress or avoidable pain; or

(b) where the condition of the equipment or instrument or the manner in which or the circumstances under which the equipment or instrument is used might subject the animal to avoidable distress or avoidable pain.

POST-MORTEM EXAMINATION AND INSPECTION

[SOR/2001-167, s. 16]

81. [Repealed, SOR/2001-167, s. 17]

82. Every operator shall ensure that

(a) all blood harvested from a food animal in a registered establishment for processing as an edible meat product is identified in a manner that indicates the car-

79. Tout animal pour alimentation humaine qui est abattu doit, avant la saignée :

a) soit être rendu inconscient de façon qu'il ne reprenne pas connaissance avant sa mort, selon l'une des méthodes suivantes :

(i) par un coup sur la tête asséné au moyen d'un dispositif mécanique pénétrant ou non pénétrant, de façon qu'il perde conscience immédiatement,

(ii) par exposition à un gaz ou une combinaison de gaz, de façon qu'il perde conscience rapidement,

(iii) par l'application d'un courant électrique, de façon qu'il perde conscience immédiatement;

b) soit être tué selon l'une des méthodes décrites à l'alinéa a) ou, dans le cas d'une volaille ou d'un lapin domestique, par décapitation rapide.

DORS/93-160, art. 9; DORS/99-369, art. 4.

80. Tout instrument ou matériel servant à la contention ou à l'abattage des animaux pour alimentation humaine ou destiné à rendre ces derniers inconscients n'est utilisé que si :

a) l'habileté et la condition physique de l'utilisateur lui permettent de le faire sans causer de souffrances inutiles à l'animal;

b) l'état de l'instrument ou du matériel, ou le mode ou les circonstances d'utilisation de ceux-ci, n'exposent vraisemblablement pas l'animal à des souffrances inutiles.

EXAMEN POST MORTEM ET INSPECTION POST MORTEM

[DORS/2001-167, art. 16]

81. [Abrogé, DORS/2001-167, art. 17]

82. L'exploitant doit s'assurer :

a) que le sang recueilli, à des fins de transformation en tant que produit de viande comestible, d'un animal pour alimentation humaine dans l'établissement agréé

APPENDIX B

CFIA Manual of Procedures, Chapter 17, Annex E

<http://www.inspection.gc.ca/english/fssa/meavia/man/ch17/annexee.shtml>

"It is mandatory for all operators of Canadian Food Inspection Agency (CFIA) inspected facilities in Canada engaged in equine slaughter for edible purposes to have complete identity and medical records for all animals (domestic and imported) presented for slaughter. These records are referred to as equine information documents."

Table of Contents include:

- E.1 Introduction
 - E.2 Equine Information Document Elements
 - E.3 Equine Description Terms
 - E.4 Equine Lot Program
 - E.5 List of Veterinary Drugs Not Permitted For Use in Equine Slaughtered For Food With Canadian Brand Name Examples
 - E.6 List of "Essential" Veterinary Drugs Permitted in Equine With a 6 Month Withdrawal Period With Canadian Brand Name Examples
 - E.7 List of Veterinary Drugs Safe for Use in Equine Intended for Food Production for Which Withdrawal Periods Have Been Determined with Canadian Brand Name Examples
 - E.8 Frequently Asked Questions and Answers
-

APPENDIX B (Cont'd)

Equine Information Document (EID) Template

A PDF interactive user-friendly individual animal EID developed for use by equine owners may be found at the Canadian Food Inspection Agency website:

<http://www.inspection.gc.ca/english/for/pdf/c5624e.pdf>

EQUINE INFORMATION DOCUMENT

PART 1 - WRITTEN AND VISUAL IDENTIFICATION			
Note: i) The EID must contain both written and visual identification. ii) Alternate options to filling out the written description and picture identification below are given at the end of Part 1.			
A) WRITTEN IDENTIFICATION			
Primary location of the animal (Land location or legal address or premises identification number)			
Primary use(s) of the animal. Check one or more of the following:			
☐ Recreation / Companion Animal / Pleasure Riding ☐ Performance / Sport / Show			
☐ Breeding ☐ Rodeo ☐ Private Industry Work ☐ Urine Production			
☐ Racing ☐ Ranch / Farm Work ☐ Public Work ☐ Food Production			
☐ Other (please specify) _____			
Sex	Month and Year of Birth (if known)	Country of Birth (if known)	Height in hands (1 hand = 4 inches)
Refer to Meat Hygiene Manual of Procedures Chapter 17, Annex E, Section E.3 for terms to be used for the following equine colour and marking identification section.			
Body Colour	Markings: Head	Markings: Body	
Markings: Limbs - Right Front	Markings: Limbs - Right Hind		
Markings: Limbs - Left Front	Markings: Limbs - Left Hind		
The following supplemental identification items may be completed if applicable.			
List visible acquired marks (brands, tattoos, scars, etc.) and location			
Pedigree registry and registration number:			
Microchip number and location:			
Passport ID number:			
Unique Equine Life Number:			
Other Unique Identifier:			
In the case of an Equine Information Document completed by the previous owner, name of previous owner			

This template provides for the minimum requirements of written and pictorial identification as well as a record of medical history and declaration(s) for equine (horses, donkeys, zebras and their crosses) presented for slaughter in Canada. This template may be used or its contents may be adapted for use by the equine industry. This PDF template may be printed as a blank or partially filled form at any stage and remaining information may be filled in by hand.

APPENDIX C

Canadian Food Inspection Agency

List of Federally Registered Meat Establishments and their Licensed Operators

Last Update : 2011/11/29

<http://active.inspection.gc.ca/scripts/meavia/reglist/reglist.asp?lang=e>

Telephone numbers:

Ending with /F = Fax Number.

Ending with /I = Inspection Number.

Not ending with anything = Location Number.

* at the end of the operator's name means the establishment is temporarily inactive.

The licensed operator of a registered establishment has a HACCP system (prerequisite programs and HACCP plans) in place that meets FSEP requirements as required by section 29 of the *Meat Inspection Regulations*, 1990

Registration Number	Name of the Operator Address(s)	Function Codes	Telephone Number(s)
076	VIANDE RICHELIEU INC./RICHELIEU MEAT INC. ----- Location Address: : 595 RUE ROYALE, MASSUEVILLE, QC, J0G 1K0 Mailing Address: : C.P. 101, MASSUEVILLE, QC, J0G 1K0	1abehi, 3x, 6x, 11ADGHLNR,	(450) 788-2667 (450) 788-2622/F (450) 788-2061/I
505	LES VIANDES DE LA PETITE-NATION INC. Also Doing Business As Name : LES CERFS DE BOILEAU ----- Location Address: : 517, RANG STE-JULIE EST, ST-ANDRÉ-AVELLIN, QC, J0V 1W0 Mailing Address: : 421, RUE ST-PAUL ESTBUREAU 200, MONTRÉAL, QC, H2Y 1H5	1abcdeh, 3xfg, 6xfg, 11ADGHKN,	(819) 983-7941 (819) 983-4041/F (819) 983-7941/I
506	BOUVRY EXPORT CALGARY LTD. ----- Location Address: : S.W. 1/4 SEC. 17TWP. 9, RG. 25, W. 4, HWY # 3 EAST, FORT MACLEOD, AB, Mailing Address: : P.O. BOX 2024, FORT MACLEOD, AB, T0L 0Z0	1acehij, 3x, 11ADGHN,	(403) 553-4431 (403) 553-3037/I (403) 553-3222/F
657	CANADIAN PREMIUM MEATS INC. ----- Location Address: : 3401 - 53RD AVE., LACOMBE, AB, T4L 2L6 Mailing Address: : RR 4, RED DEER, AB, T4N 5E4	1aehi, 3x, 11ADHLMNV,	(403) 782-9366 (403) 782-7163/F (403) 782-7991/I
This search found 4 establishment(s).			

APPENDIX C (Cont'd)

<http://active.inspection.gc.ca/scripts/meavia/reglist/reglist.asp?lang=e>

Key To Function Codes:

1. Slaughter a) Cattle b) Calves c) Sheep, lambs and goats d) Swine e) Horses f) Poultry g) Rabbits h) Others

1. Ritual Slaughter i) Halal j) Kosher

2. Canning f) Poultry Meat x) Red Meat g) Rabbit Meat

3. Boning and Cutting f) Poultry Meat x) Red Meat g) Rabbit Meat

4. Edible Rendering

5. Casing Preparation

6. Other Processing f) Poultry Meat x) Red Meat g) Rabbit Meat

7. Packaging, Labelling and Storing

8. Inedible Rendering

9. Facilities for inspection of detained or imported meat products A) Cooked, frozen, boneless beef from South America. B) Other than cooked, frozen, boneless beef from South America. C) Not requiring refrigeration. US) From the United States of America.

10. Storage Only A) Cold Storage B) Dry Storage

11. Establishments approved for export to specified markets. Please be advised that the approval of the establishments may be limited to specific products and/or that restrictions may apply. For details on the eligibility status of the establishment click on the following link and consult [the applicable section on the market of destination of chapter 11](http://www.inspection.gc.ca/english/fssa/meavia/man/ch11/11.7e.shtml):

<http://www.inspection.gc.ca/english/fssa/meavia/man/ch11/11.7e.shtml>

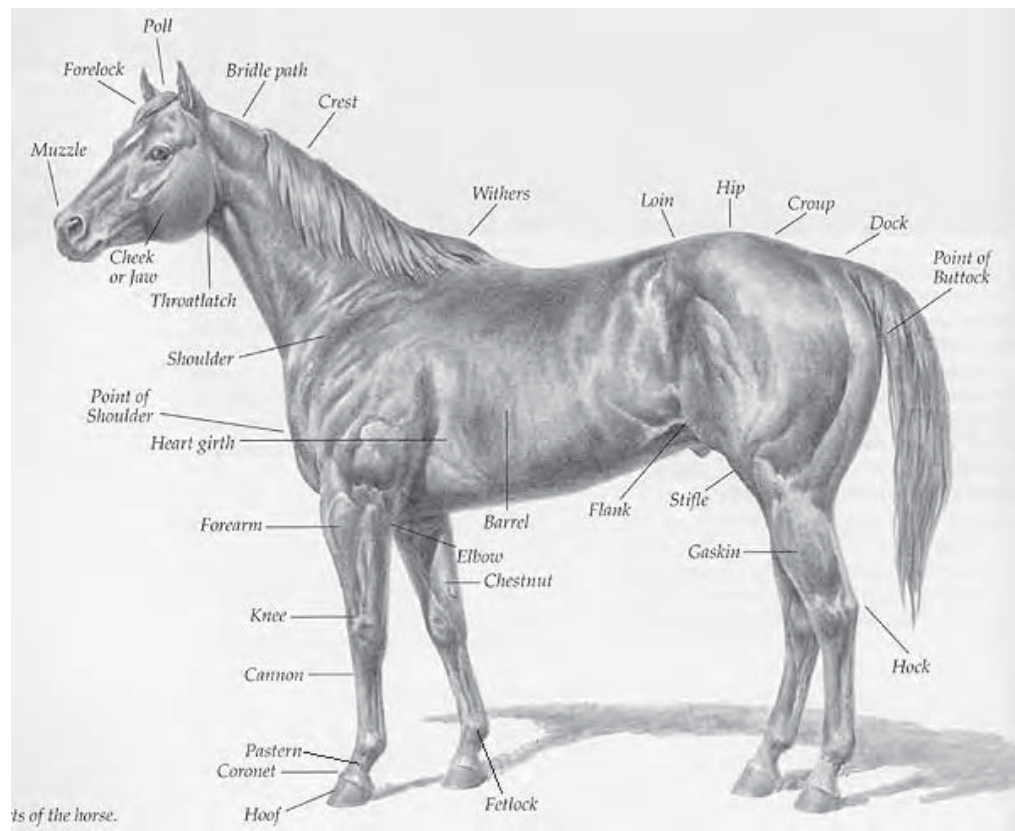
A) Mexico C) Japan D) United States F) Australia G) South Africa H) European Union* & Switzerland I) Ukraine J) Argentina K) Brazil L) Hong-Kong N) Chile O) Malaysia P) Indonesia R) Russia S) China B) Saudi Arabia M) Singapore Q) Peru V) Vietnam

*With the exception of St-Pierre et Miquelon

12. Trichina Treatment Facilities

APPENDIX D

Equine Anatomy



APPENDIX E

Photographs of Horses in Overnight Holding Pens



Horses in overcrowded holding pens - no food or water present



Thin horses, with "downer" horse on floor on left at risk of being trampled



"Downer" horse at risk of being trampled; metal shoe still on right fore hoof



Close up of "downer" horse



Thin and frightened horses in holding pen at La Petite-Nation



Fit but thin Thoroughbred in holding pen



Kill-only USDA stickers listed acronym USEZ

APPENDIX F

Sampling of Photos Attached to EID Forms



Showing tattoo



EID Forms

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EQUINE INFORMATION DOCUMENT (EID)







Height in Hands: (1 hand = 4 inches)
 Optional Attachments:
☐ Pictures (all four sides)
☐ Pedigree Papers

Tag #: 1
 Auction: _____
 USDA: _____

DRAWING (the picture shall not be required if): Lines are to be drawn on the diagrams representing white areas on the animal where applicable with red or blue pen the others with black pen. Mark whorls with an "X". Mark the location of scars with an "X".

For more explanation on the color terms or marks, consult the Web site:
<http://www.inspection.gc.ca/english/ssa/mea/via/man/ch17/annexee.shtml>

Body Color (check the correct box)

☒ Black	☐ Brown	☐ Grey	☐ Red Roan
☐ Bay	☐ Bay - Brown	☐ Palomino	☐ Buck skin
☐ Chestnut	☐ Liver chestnut	☐ Appaloosa	☐ Blue Roan
☐ Dark chestnut	☐ Light chestnut	☐ Strawberry	☐ Dun
☐ Sorrel	☐ Chestnut or Sorrel	☐ Cream	☐ Piebald (black & white)
☐ with a flaxen mane and tail	☐ Blond	☐ Skewbald (all other color combos)	

Head markings (check the correct box)

☐ Star	☐ Blaze	☐ Snip	☐ White muzzle
☐ Stripe	☐ White face	☐ Flesh mark	☒ None

Coat markings (check the correct box)

☐ Grey ticked	☐ Patch (colour, shape, position, extent)
☐ Flecked	☐ Zebra marks
☐ Black or Dark marks	☐ Withers stripe
☐ Leopard	☐ List
	☒ None

Limb markings (check the correct box)

☐ Right Foreleg	☐ Left Foreleg	☐ Right Hind Leg	☐ Left Hind Leg
--	---------------------------------------	---	--

OWNER'S NAME: _____
FULL ADDRESS: _____
PHONE NUMBER: _____ ☐ Not available

PRIMARY LOCATION OF ANIMAL: ☒ Same as above
PRIMARY USE OF ANIMAL: ☒ Recreation ☐ Work ☐ Breeding

SEX: ☐ Mare ☒ Gelding ☐ Stud **AGE:** 5
LIST VISIBLE ACQUIRED MARKS: (brands, tattoos, scars, etc... & location) Brand (B) NECK
Height in hands: 16

1. Have any drugs or vaccines been administered to or consumed by the animal during the last 180 days or during the time you owned the animal? ☐ Yes ☒ No
If YES: write the name of the drug(s) or vaccine(s), last date of use, withdrawal period for drugs, amount used (dose) per treatment if the label does not indicate a dose or if drugs is used a dosage different than the label indicates on the back side of this page.

2. Has the animal identified on this document been diagnosed with an illness during 180 days or during the time you owned the animal? ☐ Yes ☒ No
If YES: provide details with dates of diagnosis and recovery on the back side of the page.

3. Has the animal identified on this document to your knowledge been treated with a substance listed under the table named substances not permitted for use in food processing equine found in section E.5 during the last 180 days or during the time you owned the animal? ☐ Yes ☒ No

4. OWNER DECLARATION:
 I am the owner of the animal identified on this document and have had uninterrupted possession, care or control of the animal:
 From 11 12 10 TO 7 8 11

As the owner of the animal identified on this document I hereby certify that the information in this EID is accurate and complete. I understand that, effective July 31, 2010, at least six continuous months of documented acceptable history is required for an equine presented for processing in an establishment inspected by CFIA.

I always treated the animal with respect and care to meet the needs. no black ink

Signature: _____

TRANSIENT AGENT DECLARATION(S): The animal identified on this document has been
 for my care and control **SUGARCREEK LIVESTOCK AUCTION INC**
 from 7 8 11 10 **P.O. BOX 462**
BUCKEYE STREET
SUGARCREEK, OHIO 44681
PHONE 330-852-2832
 Name of agent: _____
 Address: _____
 Phone number: _____

During this time period the identified animal has not been given or fed drugs or vaccines and has not shown any signs of illness. Signature of Agent: _____

Tag number 922 **2nd TAG** 3807
EID verified
Approved

This registered Standardbred's name was "Hurricane Jeff". He was 8 years old but his EID states 5. In his racing career he earned \$108,446 for his owners and his ancestry is traced back to Cam Fella.

This EID has multiple errors. The EID owner and signature do not match. The mare's age was scratched out, and written over beside it is the number "18" (on closer examination of the original photo, the scratched out number appears to be "30"). Instead of a phone number for the owner, the agent's number is written in that field. Under Drugs section, white-out tape has been used to cover over the 'YES' box with a large box and an 'X' marked in the 'NO' box.

EQUINE INFORMATION DOCUMENT (EID)			
		OWNER'S NAME: <u>7840</u> FULL ADDRESS: <u>7840</u> PHONE NUMBER: <u>7840</u> PRIMARY LOCATION OF ANIMAL: <u>7840</u> PRIMARY USE OF ANIMAL: <u>7840</u> SEX: <u>7840</u> ☐ Mare ☐ Gelding ☐ Stud ☐ AGE: <u>7840</u> LIST VISIBLE ACQUIRED MARKS: (brands, tattoos, scars, etc., & location) <u>7840</u> Height in hands: <u>7840</u>	
DRAWING (the picture shall not be required if L) Lines are to be drawn on the diagram representing white areas on the animal, where applicable with red or blue pen the others with black pen. Mark whorls with an "X". Mark the location of scars with an "X". For more explanation on the color markings or marks, consult the web site http://www.international-equine-association.com/Equine-Information-Document-EID		OWNER'S SIGNATURE: <u>7840</u> DATE: <u>7840</u> WITNESS SIGNATURE: <u>7840</u> DATE: <u>7840</u>	
Body Color (check the correct box) ☐ Black ☐ Brown ☐ Grey ☐ Red Roan ☐ Bay ☐ Bay - Brown ☐ Palomino ☐ Buck skin ☐ Chestnut ☐ Liver Chestnut ☐ Appaloosa ☐ Blue Roan ☐ Dark Chestnut ☐ Strawberry ☐ Light Chestnut ☐ Dun ☐ Sorrel ☐ Cream ☐ Chestnut or Sorrel with a flaxen mane and tail ☐ Piebald (black & white) ☐ Skewbald (all other color combos) ☐ Blond		Head markings (check the correct box) ☐ Star ☐ Blaze ☐ Snip ☐ White muzzle ☐ Stripe ☐ White face ☐ Flash mark ☐ None	
Coat markings (check the correct box) ☐ Grey ticked ☐ Flecked ☐ Patch (colour, shape, position, extent) ☐ Zebra marks ☐ Black or Dark marks ☐ Withers stripe ☐ Leopard ☐ List ☐ None		Limb markings ☐ None White patch on (sorel) ☐ Ankle patch on (sorel) ☐ Ankle patch on (sorel) ☐ Ankle patch on (sorel)	
Transient Agent Declarations: The animal identified on this document has been under my care and control From: <u>7840</u> To: <u>7840</u> Name of agent: <u>7840</u> Address: <u>7840</u> Phone number: <u>7840</u> Signature: <u>7840</u> Date: <u>7840</u>		Signature: <u>7840</u> Date: <u>7840</u>	
Head markings (check the correct box) ☐ Star ☐ Blaze ☐ Snip ☐ White muzzle ☐ Stripe ☐ White face ☐ Flash mark ☐ None		Head markings (check the correct box) ☐ Star ☐ Blaze ☐ Snip ☐ White muzzle ☐ Stripe ☐ White face ☐ Flash mark ☐ None	
Coat markings (check the correct box) ☐ Grey ticked ☐ Flecked ☐ Patch (colour, shape, position, extent) ☐ Zebra marks ☐ Black or Dark marks ☐ Withers stripe ☐ Leopard ☐ List ☐ None		Coat markings (check the correct box) ☐ Grey ticked ☐ Flecked ☐ Patch (colour, shape, position, extent) ☐ Zebra marks ☐ Black or Dark marks ☐ Withers stripe ☐ Leopard ☐ List ☐ None	
Limb markings ☐ None White patch on (sorel) ☐ Ankle patch on (sorel) ☐ Ankle patch on (sorel) ☐ Ankle patch on (sorel)		Limb markings ☐ None White patch on (sorel) ☐ Ankle patch on (sorel) ☐ Ankle patch on (sorel) ☐ Ankle patch on (sorel)	
Head markings (check the correct box) ☐ Star ☐ Blaze ☐ Snip ☐ White muzzle ☐ Stripe ☐ White face ☐ Flash mark ☐ None		Head markings (check the correct box) ☐ Star ☐ Blaze ☐ Snip ☐ White muzzle ☐ Stripe ☐ White face ☐ Flash mark ☐ None	
Coat markings (check the correct box) ☐ Grey ticked ☐ Flecked ☐ Patch (colour, shape, position, extent) ☐ Zebra marks ☐ Black or Dark marks ☐ Withers stripe ☐ Leopard ☐ List ☐ None		Coat markings (check the correct box) ☐ Grey ticked ☐ Flecked ☐ Patch (colour, shape, position, extent) ☐ Zebra marks ☐ Black or Dark marks ☐ Withers stripe ☐ Leopard ☐ List ☐ None	
Limb markings ☐ None White patch on (sorel) ☐ Ankle patch on (sorel) ☐ Ankle patch on (sorel) ☐ Ankle patch on (sorel)		Limb markings ☐ None White patch on (sorel) ☐ Ankle patch on (sorel) ☐ Ankle patch on (sorel) ☐ Ankle patch on (sorel)	
Head markings (check the correct box) ☐ Star ☐ Blaze ☐ Snip ☐ White muzzle ☐ Stripe ☐ White face ☐ Flash mark ☐ None		Head markings (check the correct box) ☐ Star ☐ Blaze ☐ Snip ☐ White muzzle ☐ Stripe ☐ White face ☐ Flash mark ☐ None	
Coat markings (check the correct box) ☐ Grey ticked ☐ Flecked ☐ Patch (colour, shape, position, extent) ☐ Zebra marks ☐ Black or Dark marks ☐ Withers stripe ☐ Leopard ☐ List ☐ None		Coat markings (check the correct box) ☐ Grey ticked ☐ Flecked ☐ Patch (colour, shape, position, extent) ☐ Zebra marks ☐ Black or Dark marks ☐ Withers stripe ☐ Leopard ☐ List ☐ None	
Limb markings ☐ None White patch on (sorel) ☐ Ankle patch on (sorel) ☐ Ankle patch on (sorel) ☐ Ankle patch on (sorel)		Limb markings ☐ None White patch on (sorel) ☐ Ankle patch on (sorel) ☐ Ankle patch on (sorel) ☐ Ankle patch on (sorel)	

The EID below shows what could possibly be a 20-year-old pregnant mare who appears to be close to term. Her enlarged belly and prominent milk vein leads us to believe that she was 2 weeks to a month before foaling, however, the EID does not state the sex of this horse.

EQUINE INFORMATION DOCUMENT (EID)

OWNER'S NAME: SUGARCREEK LIVESTOCK AUCTION INC
 FULL ADDRESS: 102 SUGARCREEK RD BOX 456 SUGARCREEK, OHIO 44051
 PHONE NUMBER: 330-832-2832 ☐ Not available
 PRIMARY LOCATION OF ANIMAL: Same as above
 PRIMARY USE OF ANIMAL: ☒ Recreation ☒ Work ☐ Breeding
 SEX: ☐ Mare ☐ Gelding ☐ Stud ☒ AGE: 20
 LIST VISIBLE ACQUIRED MARKS: (brands, tattoos, scars, etc., & location) Height in hands: 17
 (brands, tattoos, scars, etc., & location) Height in hands: 17
 DRAWING (the picture shall not be required if): Lines are to be drawn on the diagrams representing white areas on the animal where applicable with red or blue pen (the others with black pen). Mark whorls with an "X". Mark the location of scars with an "X".
 For more explanation on the color terms or marks, consult the Vets site: <http://www.veterinarian.ca/diagnosing/diagnosing.htm>
 Body Color (check the correct box):
☒ Black ☐ Bay ☐ Chestnut ☐ Dark chestnut ☐ Light chestnut ☐ Sorrel ☐ Bay-Brown ☐ Liver chestnut ☐ Dark chestnut ☐ Light chestnut ☐ Sorrel ☐ Chestnut or Sorrel with a flaxen mane and tail ☐ Blond ☐ Grey ☐ Palomino ☐ Appaloosa ☐ Blue Roan ☐ Strawberry ☐ Dun ☐ Cream ☐ Piebald (black & white) ☐ Skewbald (all other color combos) ☐ Red Roan ☐ Buck skin
 Head markings (check the correct box):
☒ Star ☐ Blaze ☐ Grey ticked ☐ Flecked ☐ Black or Dark marks ☐ Leopard ☐ Snip ☐ White muzzle ☐ Patch (colour, shape, position, extent) ☐ Zebra marks ☐ Withers stripe ☐ List ☒ None
 Coat markings (check the correct box):
☒ Star ☐ Blaze ☐ Grey ticked ☐ Flecked ☐ Black or Dark marks ☐ Leopard ☐ Snip ☐ White muzzle ☐ Patch (colour, shape, position, extent) ☐ Zebra marks ☐ Withers stripe ☐ List ☒ None
 Limb markings (check the correct box):
☒ None ☐ Right Foreleg ☐ Left Foreleg ☐ Right Hind Leg ☐ Left Hind Leg
 White patch on coronet:
 A: Anterior, L: Lateral, P: Posterior, M: Medial
 White coronet:
 White pastern:
 White fetlock:
 White to knee:
 White to hock:
 White to hind quarter:
 Vascularized hind quarter:
 If picture attached, no need to fill the left side of this document
 Right side must be filled out completely. If information not known, write and know in the past

As the owner of the animal identified on this document, I hereby certify that the information in this EID is accurate and complete. I understand that, effective July 31, 2010, at least six continuous months of documented acceptable history is required for an equine presented for processing in an establishment inspected by OPA.
 Signature: [Signature]
 Tag number: 892 2nd TAG: 3821
 EID verified: [Signature]
 Approved: [Signature]



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Height in Hands: 14.5
(1 hand = 4 inches)

Tag #:
Auction:
USDA:

Optional Attachments:
☐ Pictures (all four sides)
☐ Lines (all four sides)
☐ Owners (all four sides)

OWNER'S NAME:
FULL ADDRESS: 14000 E. 10th
PHONE NUMBER: 407-846-4444

PRIMARY LOCATION OF ANIMAL: ☒ Not available ☐ Same as above

PRIMARY USE OF ANIMAL: ☐ Recreation ☐ Work ☐ Breeding

SEX: ☐ Male ☐ Gelding ☐ Stud **AGE:** 12

LIST VISIBLE ACCOUNT MARKS:
 (brands, tattoos, scars, etc., & location) **Height in hands:** 14.5

When a brand or tattoo is used on an animal in this document, the person who placed the brand or tattoo must sign the diagram of the animal in the document. The picture should be large enough to see the details required. The views shall be printed on a standard 8.5"X11" paper. Owners date and sign the picture.

1. Have any drugs or vaccines been administered to or consumed by the animal during the last 180 days or during the time you owned the animal? YES ☒ NO ☐

IF YES: write the name of the drug(s) or vaccine(s), last date of use, withdrawal period (if drugs) and/or how the animal was treated. If the label does not indicate a dose or if a drug is used a dosage different than shown please print treatment if the label does not indicate a dose or if a drug is used a dosage different than shown.

2. Has the animal indicated on this document been diagnosed with an illness during the 180 days or during the time you owned the animal? YES ☐ NO ☒

IF YES, provide details with dates of diagnosis and recovery on the back side of the page.

3. Has the animal indicated on this document to your knowledge been treated with a substance listed during the last 180 days or during the time you owned the animal? YES ☐ NO ☒

4. OWNER DECLARATION:
 I am the owner of the animal identified on this document and have had uninterrupted possession, care or control of the animal:

From 12 2 10 TO 07 8 11

As the owner of the animal identified on this document I hereby certify that the information in this EID is accurate and complete. I understand that, effective July 31, 2019, if I fail to update continuous months of documented acceptable evidence is required for an equine practitioner to process in an establishment registered by CFIA.

I have treated the animal with respect and care to meet the needs, no black ink

Signature: TSRuggins

TRANSIENT ANIMAL DECLARATION(S): The animal identified on this document has been under my care and control SUGARCREEK LIVESTOCK AUCTION INC

From 07 8 11 TO 07 11 11

Name of agent: SUGARCREEK, OHIO 44601

Address: 102 BOX 452

Phone number: PHONE 330-852-2832

During this time period the individual animal has not been given any drugs or vaccines nor has it been given any signs of illness. Signature of Agent: TSRuggins

Color
(check the correct box)

☐ Black ☐ Brown ☐ Grey ☐ Red Roan

☐ Bay ☐ Bay - Brown ☐ Palomino ☐ Buck skin

☐ Chestnut ☐ Appaloosa ☐ Blue Roan ☐ Strawberry

☐ Liver chestnut ☐ Dark chestnut ☐ Light chestnut ☐ Dun

☐ Sorrel ☐ Cream ☐ Piebald (black & white)

☐ Chestnut or Sorrel with a flaxen mane and tail ☐ Blond ☐ Skewbald (all other color combos)

Head markings (check the correct box)

☐ Star ☐ Blaze ☐ Snip ☐ White muzzle

☐ Stripe ☐ White face ☐ Flesh mark ☒ None

Coat markings (check the correct box)

☐ Grey backed ☐ Patch (colour, shape, position, extent)

☐ Flecked ☐ Zebra marks

☐ Black or Dark marks ☐ Withers stripes

☐ Leopard ☐ List ☒ None

Limbs markings ☐ None

Right Foreleg ☐ Left Foreleg ☒ Right Hind Leg ☐ Left Hind Leg ☒

White patch on coronet ☐ Anterior, L, Lateral ☐ Posterior, M, Medial ☐

Other pattern ☐

Other fabric ☒

Other leather ☐

Other rock ☐

Other first quarter ☒

Other last quarter ☐

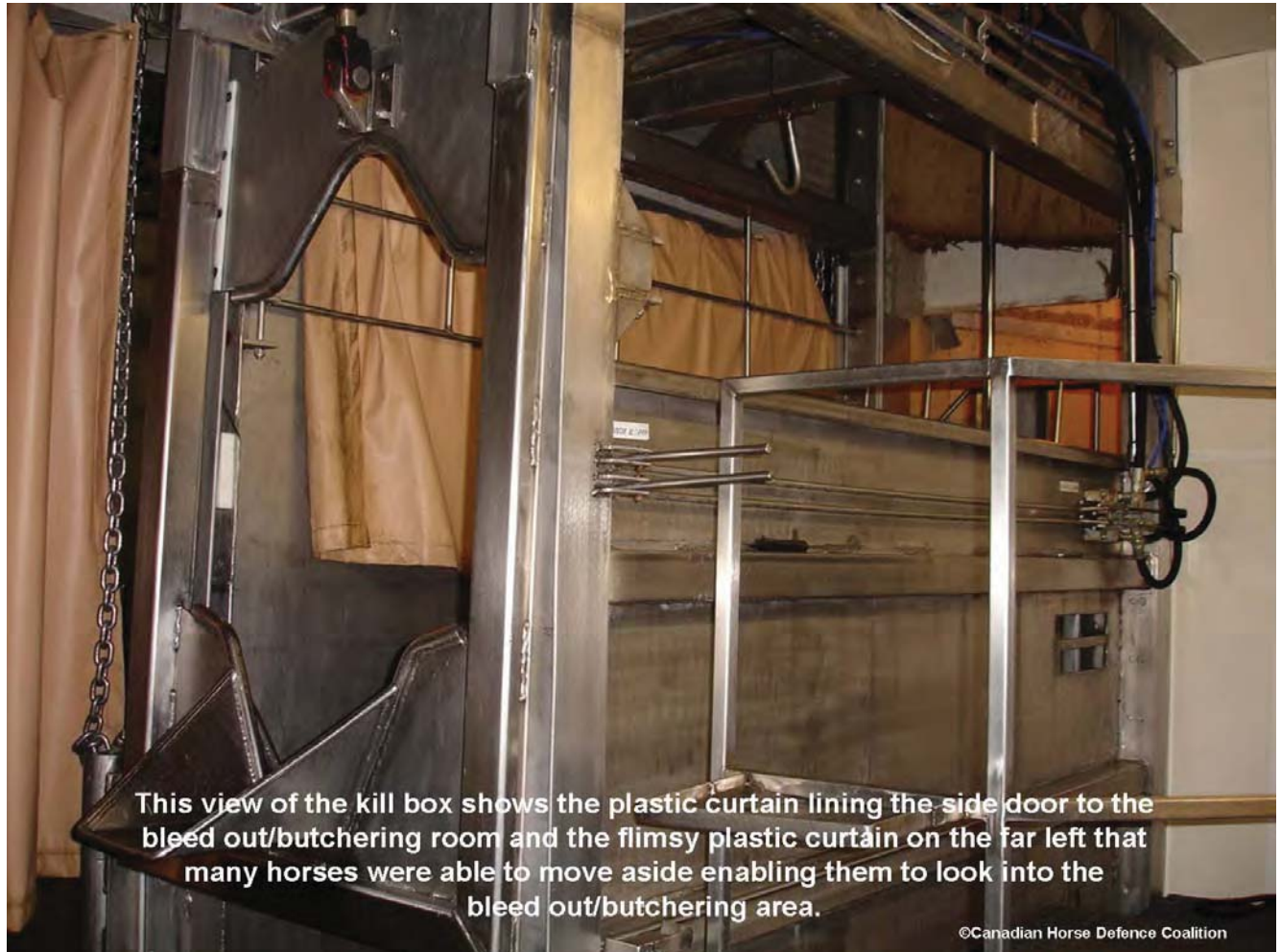
Other pastern ☐

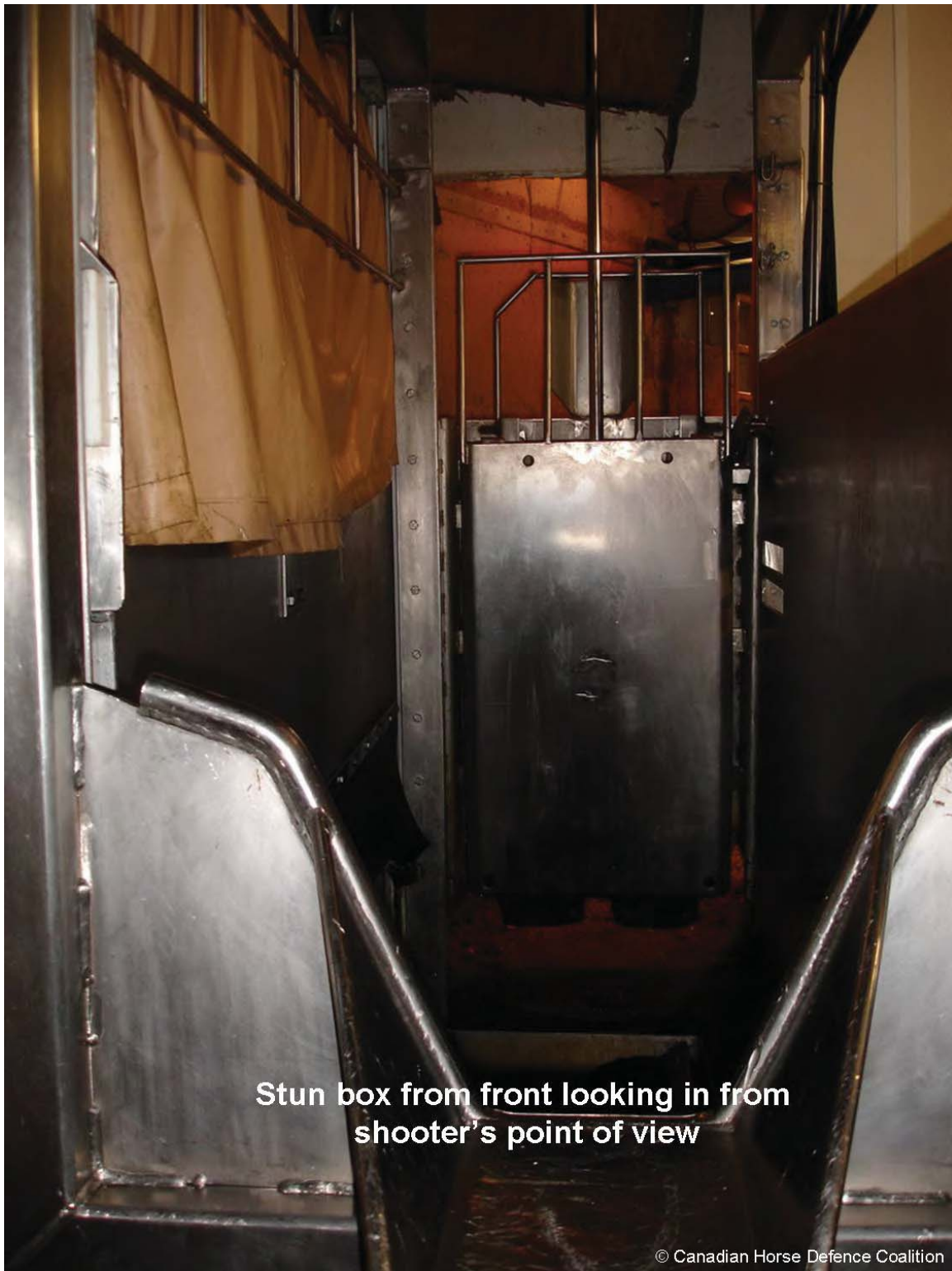
Other remarks (no need to fill left side of the document
 leave remarks to fit out completely, if information does not

A photograph of a brown horse with white markings on its hindquarters and lower legs, standing in a stable stall. The horse is facing right, and its body is marked with white paint or tape. The stall has wooden walls and a metal door.

APPENDIX G

Stun Box Design





APPENDIX H



Discarded halters near the stun box.



Horse carcasses inside the cold storage room.



Horse hides.



Skids piled high with horse hides.



Canadian Horse Defence Coalition

150 First Street

P.O. Box 21079

Orangeville, Ontario L9W 4S7

Phone: (250) 768-4803

Email: info@defendhorsescanada.org

Web: www.defendhorsescanada.org

EXHIBIT 17

WHEN HORSE SLAUGHTER COMES TO TOWN

An Int'l Fund for Horses SPECIAL REPORT

Written and Researched by Jane Allin

Edited by Vivian J Grant

March 2011



Table of Contents

I. Environmental Impact

The serious, costly negative impact on the environment resulting from horse slaughter facilities and the methods of waste disposal are well documented, and potentially harmful to the citizens of surrounding communities. **Pp 3-5.**

II. Economic Growth and Community Welfare

Horse slaughter operations, time and time again, have shown to have a detrimental impact on the economic disposition and image of the communities where they are located. Slaughterhouses are not good neighbors, increase crime and serious on-the-job injuries to their workers. **Pp 5-7.**

III. Legal Implications

There are ample legal complications associated with attempting to re-establish horse slaughter in the U.S. The remaining slaughter houses in the U.S. were shut down in 2007 as a result of state legislation. However, federal legislation is still being actively pursued to end it nationally. Stringent new requirements for the export of American horse meat from North America to Europe has been mandated due to prohibited drug residues potentially harmful to human health. **Pp 7-10.**

IV. Opposition to Horse Slaughter

There is strong opposition to horse slaughter in the United States and Canada. It has been reported that as many as 85% of the population is opposed to it. The horrendous conditions of transport and brutality involved in the slaughter of horses are unspeakable. The grassroots movement to end it is relentless. Horse slaughter will never be accepted as part of American culture. **Pp 10-15.**

V. Alternatives to Horse Slaughter

There are many alternatives to horse slaughter. A group of respected horse rescues have developed a six point plan outlining workable solutions, some of which are already in place. A strategic component to stopping horse slaughter is reducing the surplus horse population by placing the onus of accountability on horse breeders and owners. Congress is also looking at removing breeding incentive tax breaks and taxing horse owners. **Pp 15-20.**

VI. Conclusion

The horse slaughter industry is an insidious, brutal and unforgiving business that exists for one reason and one reason only. Horse slaughter exists to supply the demand for horse meat and to profit from it. When horse slaughter comes to town, environmental hazards, economic woes, and the stigma associated with the cruelties inherent to killing horses for their meat, are only a part of the price they will pay. **P 20.**

I. Environmental Impact

Historically, the negative environmental impact of horse slaughter plants has been well documented.

In 2007, all three of the foreign owned horse slaughter plants in the United States were shut down under Texas and Illinois state laws. The two Texas based plants, Beltex in Dallas and Dallas Crown in Kaufman, were closed in February when the 5th District court ruled that a 1949 law against selling horse meat was valid and in force. The remaining plant, Cavel International in DeKalb, Illinois, closed in mid-September of the same year under a new state law making horse slaughter illegal.¹

It was community administrators and local residents who actively petitioned to have horse slaughter plants shut, citing the extreme disregard for the welfare of the people and locales where they existed as well as the merciless suffering of the horses sent to them.

Numerous Violations Plague Communities

All three horse slaughter plants amassed numerous environmental violations and overwhelmed the waste water infrastructures due to dumping of blood, entrails, urine, feces, heads and hooves.

The Dallas Crown horse slaughter facility had been in operation in Kaufman since the late 70's and from the beginning had caused problems both economically and environmentally. "The slaughterhouse constantly flooded the town's drinking water with blood and tissue – literally coming out of the taps – and had never complied with city water standards, or paid fines."²

Furthermore, in May 2002, the City noted that another public health hazard "was the vector attraction due to bones and horseflesh falling off your bone trailer" and that "dogs were carrying the bones into the community."³

In fact, in an open letter to state legislators considering pro-horse slaughter resolutions, the town's mayor at the time, Paula Bacon, referenced Public Works reports regarding effluent and waste water violations "decaying meat [which] provides a foul odor and is an attraction for vermin and carrion," containers conveyed "uncovered and leaking liquids," there are "significant foul odors during the daily monitoring of the area," and "Dallas Crown continually neglects to perform within the standards required of them."⁴

Beltex was a Texas Corporation with European shareholders that had been slaughtering horses for human consumption for 27 years.

As with Dallas Crown, Beltex had a non-unionized workforce. OSHA records revealed that since the plants' inception in 1977 until its last inspection in 1997, Beltex had committed 29 violations of which 28 were deemed serious. OSHA records show that an ammonia leak occurred in 1996, but no one (fortunately) died or was permanently disabled. In 2000 the facility "accidentally pumped blood into the creek" and "in 2001, they were notified that waste water was flowing into adjacent properties and into the creek."⁵

1 Holland, John; Horse Slaughter Trends 2006-2010; Equine Welfare Alliance; http://www.equinewelfarealliance.org/uploads/Horse_Slaughter_Trends_2006-2009.pdf ; February 2010.

2 Testimony of Congressman John E. Sweeney; H.R. 503 – American Horse Slaughter Protection Act; <http://republicans.energycommerce.house.gov/108/hearings/07252006Hearing1992/Sweeney.pdf> ; Jul. 25, 2006.

3 Sorg, Lisa; Violations Dog Beltex, Dallas Crown; <http://tiny.cc/ag62l> ; Jun. 19, 2003.

4 Bacon, Paula; Open letter to state legislatures considering pro-horse slaughter resolutions; Animal Law Coalition; <http://tiny.cc/2wrx6> ; Feb. 13, 2009.

5 Sorg, Lisa (<http://tiny.cc/ag62l>).

Of particular note, the Sanitation Group of DeKalb, Illinois, where Cavel International was located, identified the incomparable hazard associated with the discharge from horse slaughter facilities.

"This hazard is uniquely acute for horse slaughter because of the wide range of drugs given to horses that are clearly labeled NOT FOR USE IN HORSES INTENDED FOR HUMAN CONSUMPTION."⁶

These noxious drugs are not only present in the meat intended for human consumption overseas but also in the waste water and sludge produced during processing. This runoff has the potential to contaminate down-stream water intakes, including groundwater used for human consumption, and can enter the food chain via sludge distribution on crops.

Unlike the aforementioned, decades old horse slaughter plants in Texas, Cavel International in Illinois was a sparkling new, purpose built facility that re-opened in June, 2004 with a state-of-the-art pre-treatment system.

Additionally, Cavel International had special Industrial Waste Permits that allowed much higher (8 times higher) contamination levels for waste water leaving the slaughter house. But Cavel was still out of compliance. And not just a few times. This facility was in significant non-compliance hundreds of times. In one report, a Cavel employee acknowledges "chunks" from slaughtered horses were oozing out of tanks. This does not include the numerous safety violations documented by the FSIS.⁷

As a final point, these practices and findings are not limited to the U.S. In Canada, Natural Valley Farms in Neudorf, Saskatchewan, was shut down by the Canadian Food Inspection Agency in 2009 for food safety concerns. NVF went into receivership on September 22, 2008, yet horses continued to be slaughtered at the facility by Velda Group, an international Belgian-based company. Velda was infamous in Illinois for numerous environmental charges and convictions at their Cavel International horse slaughter plant that closed business in September 2007.⁸

"Blood disposal appears to have been equally problematic for NVF as with other horse slaughter plants. Not only do horses have twice the quantity of blood as cows, but the blood is notoriously difficult to treat. The bacterial agents used in standard cattle digesters fail to provide acceptable discharge levels because of antibiotics often found in horse blood. As a result, pollution follows the horse slaughter industry where ever it goes."⁹

Former mayor of Kaufman, Paula Bacon, comments "In Canada they have apparently become even more blatant, dumping huge untreated piles of entrails onto open ground and even using a tanker truck to discharge blood and refuse into a local river."¹⁰

In any case, the negative environmental impacts and the chronic inability of the facilities to comply with local laws pertaining to waste management and air and water quality far outweigh any benefits.

This quote by Henry Skjerven, an investor and former director of NVF, sums it up: "Natural Valley Farms died the day the decision makers chose to kill horses"¹¹

6 DeKalb Sanitary District; DeKalb Sanitary District Board meeting Minutes; <http://tiny.cc/31y3m> ; Jan. 18, 2006.

7 Allen, Laura; Animal Law Coalition; "Sacia introduces new bill to support horse slaughter," ; <http://tiny.cc/ufjo4> ; Jan. 14, 2010.

8 Holland, John; Canadian Horse Defense Coalition, Summary of Cavel International Violations – Non Compliance and Response; <http://tiny.cc/sjwwj> ; undated.

9 Holland, John; Horse Slaughter Dream a Financial Nightmare; Harnesslink Newsroom; <http://tiny.cc/tq5o6> ; May 14, 2009.

10 Holland, John (<http://tiny.cc/sjwwj>).

11 Holland, John (<http://tiny.cc/tq5o6>).

Environmental issues continue to plague the horse slaughter industry. On December 3, 2010, the Bouvry Exports horse slaughter plant in Fort MacLeod, Alberta closed operations to complete renovations related to sanitation.¹²

II. Economic Growth, Employment and Community Welfare

Contrary to what some pro-horse slaughter proponents say, horse slaughter facilities trigger negative economic growth for the communities in which they are situated. This is far-reaching and insidious. The USDA states that profits from horse slaughter are negligible. "It is entirely foreign owned, and pays no corporate taxes or export tariffs. The horse slaughter industry is economically insignificant."¹³

Comments from Paula Bacon, former Mayor of Kaufman, Texas, home of Dallas Crown, elucidate the issues. Bacon was vigilant in underscoring the operation's copious environmental violations and subsequent negative impact upon the community. Persistent and tireless lobbying against the plant in support of the health and welfare of the community as well as the horses finally lead to the unanimous decision by the City's judicial board to close the plant.

"Dallas Crown had a negative effect on the development of surrounding properties, and a horse slaughter plant is a stigma to the development of our city generally" "the corporations involved in this industry have consistently proven themselves to be the worst possible corporate citizens" "the industry caused significant and long term hardship to my community."

"During this time, I learned that an estimated \$5 million in Federal funding was being spent annually to support three foreign-owned horse slaughter plants! And when the Dallas Crown tax records were exposed in the city's legal struggle, we found that they had paid only \$5 in federal taxes on a gross income of over \$12,000,000!"

"The more I learn about horse slaughter, the more certain I am: There is no justification for horse slaughter in this country. My city was little more than a doormat for a foreign-owned business that drained our resources, thwarted economic development and stigmatized our community. Americans don't eat horses, and we don't raise them for human consumption. There is no justification for spending American tax dollars to support this industry at the expense of Americans and our horses."¹⁴

Dallas Crown had numerous, repeated and unresolved violations to their industrial waste permit – denying the City access to their property for waste water testing despite requirement by city ordinance, city permit agreement, and court order as well as overloading the waste water treatment plant capacity among other serious infractions. Furthermore, in order to accommodate the water generated by the operation, city staff reported that a \$6 million upgrade would be required even though it had been financed to last through to 2015.¹⁵

As with the Dallas Crown Corporation, foreign-owned slaughterhouses formerly in operation paid little to no taxes to the communities where they existed. Any profits were repatriated to European owners who garnered significant benefits through the inexpensive purchase of American horses by "killer buyers" at livestock auctions; horse meat sells for \$20 /lb or more in most foreign countries.

12 Press Release; Canadian Horse Defence Coalition; <http://tiny.cc/n6nx7> ; Dec. 10, 2010.

13 Potter, Meg; Selling our soul; Expendable equines in the new recession; http://www.bridleandbit.com/artman/publish/article_25099.shtml ; Apr. 3, 2009.

14 Bacon, Paula; Open Letter to State Legislatures; <http://tiny.cc/tznzgl> ; February 2009.

15 Ibid.

Furthermore, given that agricultural production represents 1.2% of the GDP and only 0.6% of employment nation-wide, building a horse slaughter facility has no significant impact on economic growth but simply serves to whet the palates of European and Asian epicureans.¹⁶

Many horse slaughter plants employ illegal immigrants and ex-felons who have committed violent crimes. The farmed-animal industry, horse slaughter included, deliberately recruits immigrants because they will accept low wages and can be easily manipulated for fear of losing their jobs.¹⁷ Their willingness to accept low wages has the potential to drive down wages in the communities that support them.

Furthermore, animal processing facilities are one of the most dangerous places in America to work. According to statistics from the U.S. Department of Labor, nearly one in three slaughterhouse workers suffers from illness or injury, compared to one in 10 workers in other manufacturing jobs.

That said, several studies show that "more than half of the country's estimated 12 million illegal immigrants are uninsured (out of a total of 47 million uninsured people in the U.S.) and thus likely to use public emergency rooms that treat everyone regardless of ability to pay."¹⁸ This has the capacity to put a strenuous burden on local government budgets and potentially lead to significant compensation claims that could deplete state resources.

What's more, the social consequences endured by several towns in the mid-west that have supported such industries are appalling.

According to researcher Amy Fitzgerald, "current statistics on whether slaughterhouses make good neighbors are a fait accompli. The documented crime increases include a 130% increase in violent crimes in Finney County, Kansas (Broadway 2000) and a 63% increase in monthly police bookings in Lexington, Nebraska (Gouveia and Stull 1995). Increases in crime have also been observed in at least one Canadian town to date: the town of Brooks, Alberta witnessed a 70% increase in reported crime."¹⁹

Regardless of what pro-slaughter groups claim, the evidence is unmistakable. "Low paying wages, increased haphazard populations without stable economic anchors, split up families, and the uneducated unskilled labor force, are not the kinds of dividends any community needs. Cranking up horse slaughter plants in times of economic necessity shows about as much ingenuity as legalizing bordellos. The cure is worse than the disease."²⁰

When compared to other dirty, low paying jobs experts portray the industry as uniquely different in terms of spawning societal chaos "Dis-confirming those theories and finding unique effects of slaughterhouse employment would point to the alternative hypothesis as a possible explanation: that the type of work undertaken in slaughterhouses contributes to the social disruption observed."²¹

Research by Anderson, Patterson and Spiegel corroborates this hypothesis.

Unlike other low-paying routinely dangerous industrial jobs, they advise that slaughterhouses are fundamentally atypical. That is, "the correlation between dismembering animals and victimization of

16 GDP: Percent GDP from agriculture; EarthTrends- The Environmental Information Portal, World Resources Institute; <http://tiny.cc/tycrd> ; 2007.

17 Exploiting immigrant labor; http://www.goveg.com/workerRights_immigrant.asp ; undated.

18 Rahman, Mizanur; Illegal immigrants: benefits and negatives, Immigration Chronicles; http://blogs.chron.com/immigration/archives/2008/08/post_151.html ; Aug. 16, 2008.

19 Potter, Meg (http://www.bridleandbit.com/artman/publish/article_25099.shtml)

20 Ibid.

21 Ibid.

less powerful human groups such as women and children is clear and bears itself out in increased domestic violence in communities surrounding slaughterhouses."²²

III. Legal Implications

U.S. Legislation to End Horse Slaughter

Legislation banning the domestic slaughter and export for slaughter of American horses for human consumption has a long history. It continues to be pursued at both the State and Federal levels where it receives majority bipartisan support from lawmakers and constituents.

The first legislative action banning horse slaughter and the export for slaughter began at the State level in 1998 in California when Proposition 6 passed with nearly 5 million voters approving the measure.

The first legislative action at the Federal level was introduced on July 17, 2001, in the 107th Congress. Bills banning horse slaughter and export for slaughter for human consumption have been re-introduced in Congress for the past decade. None of these bills have been successful.²³

Any type of legislation appearing to have any potential for ending horse slaughter for human consumption – at the State and Federal levels – is opposed and vigorously lobbied against by powerful factions of the animal agriculture industry, on each occasion overriding the will and intention of the people who just as vigorously come out in support.

Federal legislation is set to be introduced in the 112th Congress that will eliminate the export of horses for the purpose of slaughter for human consumption and prohibit the return of horse slaughtering operations to U.S. soil.

Other Legislative Strategies to End Horse Slaughter

During the 109th Congress, sponsors of the American Horse Slaughter Prevention Act (H.R. 503/S. 311) successfully sought enactment of a rider in USDA appropriations acts to deny federal funding for USDA inspections of horse slaughtering operations under the Federal Meat Inspection Act (21 U.S.C. §§ 601 et seq.). Such inspections are required for the marketing of meat considered fit for human consumption, including horses.

The funding prohibition was originally enacted in 2005 as part of the FY2006 Agriculture Appropriations Act. However, the USDA responded by adopting new rules that allowed the slaughterhouses to pay for the inspections themselves.

A 2007 court ruling ordered the USDA to stop these inspections, thereby ending horse slaughter across the country.²⁴

Legislators introducing bills to return horse slaughter to U.S. soil in their States, are seeking ways to bypass the federal ban, including creating their own State horse meat inspection programs.

Federal agriculture officials call that presumption into question, stating that the restrictions that ban U.S. Department of Agriculture inspectors from overseeing the killing and processing of horses also apply to all State inspection programs.

²² Ibid.

²³ Int'l Fund for Horses; Horse Slaughter Legislative Timeline; <http://tiny.cc/zajwo> ; 1998-2011.

²⁴ New York Bar Association, Committee on Legal Issues Pertaining to Animals; http://www.nycbar.org/pdf/report/Horse_Slaughter.pdf ; undated.

"There is no possibility under the current law for a state-inspected meat plant to ship any meat, interstate or internationally, for human consumption," said USDA spokesman Neil Gaffney.²⁵

EU Quarantine of American Slaughter Horses Bound for Canada

Apart from the obvious legal ramifications in North America, there is yet another reason to avoid re-opening horse slaughtering facilities.

In 2009, the Int'l Fund for Horses began alerting the European Parliament of the fact that "horse meat exported from North America to EU member countries where it is eaten, is adulterated because of the presence of Bute²⁶ and other prohibited medications routinely given to horses in the United States and Canada."²⁷

The Int'l Fund for Horses were proven justified in doing so.

Decades of USDA studies asserting U.S. and Canadian horse meat as chemically harmless have been branded as bogus by a new peer reviewed scientific study.

The paper, titled "Association of Phenylbutazone Usage With Horses Bought for Slaughter: A Public Health Risk" appeared in the journal *Food and Chemical Toxicology*.²⁸

This study questions USDA and CFIA horse meat testing capabilities. USDA and CFIA programs have consistently given U.S. horse meat exported for the dinner tables of Europe and other destinations a clean bill of health despite containing residues of Bute and scores of other dangerous chemicals potentially toxic to humans.

The EU responded with a new directive that equines from North America must be quarantined for a period of six months prior to slaughter for human consumption. Equine owners would now be required to record medical conditions and treatment history if they intend to present their horses for slaughter for human consumption.

The required records are in the form of an Equine Information Document (EID) that must be presented for each equine processed for edible purposes in a CFIA inspected processing facility start on July 31, 2010 forward.²⁹

This rigorous enforcement of food safety regulations closely follows the current regime in Europe wherein EU countries use a "passport system" for slaughter animals that serves to document what substances animals have received over their lifetimes with the purpose of banning meat tainted by drugs. In the instance of horses, this would include those commonly given to horses, such as antibiotics, wormers and Bute, among others.³⁰

25 Young, JoAnne; Federal law would not allow horse meat to be shipped out of state; *Lincoln Journal-Star*; <http://tiny.cc/sj6wk> ; Feb. 28, 2011.

26 Dr. Bob Wright - Veterinary Scientist, Equine and Alternative Livestock/OMAFRA; Phenylbutazone (Bute) Use in Horses; <http://tiny.cc/37jmn> ; Dec. 1, 2004.

27 Int'l Fund for Horses; Canadian Food Inspection Agency readies for new EU directive on slaughter horses; Tuesday's Horse, <http://wp.me/p6VVi-2dV> ; Jan. 31, 2010.

28 Nicholas Dodman, Nicolas Blondeau and Ann M. Marini; Association of phenylbutazone usage with horses bought for slaughter: A public health risk ; <http://tiny.cc/duvc4> ; Feb. 17, 2010.

29 Horse Industry Association of Alberta; Proposed regulations for horses going into the food chain; <http://www.albertahorseindustry.ca/eNews/foodchainregs.html> ; 2010.

30 Vets for Equine Welfare Fact Sheet: Medications and US Horse Meat; <http://www.vetsforequinewelfare.org/medications.php> ; February 2007.

Any country that intends to export food animals to the EU must have proper documentation and procedures in place that parallel those in the EU.³¹

The Int'l Fund for Horses, unhappy with the CFIA's response to the EU directive states:

"The CFIA have devised a system of merely reporting horse health histories, instead of *quarantining* them, as ordered by the European Union's recent directive regarding slaughter horses in North America." Moreover, in 2007, a Wisconsin woman "has been fined for selling horses without testing them for disease and forging documents claiming the tests had been done." Although this took place before the EU mandate, this is an obvious warning that the CFIA cannot rely on the integrity of its Equine Information Document."³²

An article "New EU rules may end slaughter of American Horses," written by Carrie Gobernatz of Examiner.com states:

"The new rules will mean that horses coming from auctions and other sources in the U.S. will have to be kept drug free on a feedlot for half a year. Producers estimate that feeding horses that long will more than double their cost, making them less competitive with horses from other sources. And that is likely to be only half their problem."³³

In an interview with Henry Skjerven, a former director of the Natural Valley Farms slaughter plant in Saskatchewan, Canada, the truth behind horse slaughter becomes apparent:

"Unfortunately, North America, U.S. and Canada, were never geared for raising horses for food consumption. The system as it stood when we were killing horses was in no way, shape or form, safe, in my opinion."

Skjerven states further:

"We did not know where those horses were coming from, what might be in them or what they were treated with. I was always in fear - I think that it was very valid - that we were going to send something across there [to the EU] and we were simply going to get our doors locked after we had some kind of issue with the product."³⁴

Implementation and Enforcement

Since the execution of the new EU directive in Canada as of July 31, 2010, the enforcement of these new regulations appears to be comparatively lax.

The flow of horses across the border from U.S. livestock auctions and killer buyers to Canada has not waned, nor has anything been reported on refusal of loads at the slaughter plants. Seemingly then, the EU continues to import drug-tainted horse meat.

Over 50% of the horses slaughtered in Canada for human consumption come from the U.S. Most, if not all, have received many of the drugs banned from the food chain and will not be quarantined for the requisite time frame for these drugs to have been eliminated from their systems.

31 Explanatory memorandum to the horse passport regulations 2009 No. 1611; Office of Public Sector Information, UK; http://www.opsi.gov.uk/si/si2009/em/uksem_20091611_en.pdf ; Jun. 2, 2009.

32 Int'l Fund for Horses; CFIA reporting system for slaughter horses flawed and unenforceable; Tuesday's Horse; <http://wp.me/p6VVi-2hy> ; Feb. 9, 2010.

33 Gobernatz, Carrie; New EU rules may end slaughter of American Horse; Horse News Examiner; <http://tiny.cc/4ekjq> Aug. 4, 2009.

34 Ibid.

In particular, Bute is administered on a regular basis to relieve pain, particularly in sport horses, and is inappropriately likened to the term “aspirin”. In fact, any animal that receives Bute is banned from ever entering the food chain as it is a known carcinogen thereby completely eliminating them for human consumption.

Even more alarming, some U.S. kill buyers have indicated that they are unconcerned about the new regulations and will simply falsify the required Equine Information Document (EID) paperwork. This is a common occurrence for other test certificates (e.g. Coggins) which are routinely anecdotal. The question then remains. How will the CFIA and EU regulators verify compliance?

Just the Beginning

While the current system may be inadequately implemented, this initiative is only the first in a series of new regulations that by 2013 are expected to generate an electronic database with full medical histories wherein the EID is to be an implanted microchip in each and every horse destined for slaughter. Any horses flagged for banned substances will be considered ineligible.

How then will the current enforcement of these regulations develop to guarantee this happens? It is doubtful the U.S. will comply or adopt any formal procedures to provide sufficient information for the completion of a Canadian EID.

In any case, the market for North American horse meat may be on the verge of collapse.

Many European importers have promised customers that they will no longer purchase from the North American supply chain. This stems in part from the realization of the extreme cruelty of the slaughter pipeline in North America and Mexico, as exposed by GAIA, a respected animal welfare in Belgium, and Animals' Angels USA,³⁵ together with the growing awareness that horses in North America are not subject to the restrictions that apply to food animals and have been administered otherwise forbidden drugs.

The Int'l Fund for Horses reports that horse meat faces a ban in Italy:

"When this proposal is successful and horse meat is banned, it will take a huge bite out of demand and save more than 200,000 innocent [horse's] lives in Italy alone, not counting the horses who are slaughtered for human consumption in other countries for export to Europe."³⁶

On June 16, 2010, Canadian Parliament by MP Alex Atamanenko (NDP Agriculture Critic) tabled a Private Member's Bill, C-544³⁷, banning the slaughter of horses for human consumption. The underlying basis of the bill is directly related to food safety as horses in North America are not primarily raised for human consumption.³⁸

Moreover, it is an explicit response to the current EU regulations given that the majority of slaughter-bound horses cannot be in compliance with the EU quarantine mandate due to enforcement failures.

The bill currently sits in the first reading in the House of Commons.

35 Int'l Fund for Horses; Horse Slaughter Bombshell hits Belgium and Holland; Tuesday's Horse; <http://wp.me/p6VVi-2xT> ; Apr. 19, 2010.

36 Int'l Fund for Horses; Horsemeat faces ban in Italy; Tuesday's Horse via *The Telegraph* UK, written by Nick Pisa; <http://wp.me/p6VVi-2gJ> ; Feb. 9, 2010

37 House of Commons Canada; Bill Text C-544; <http://tiny.cc/8qwtu> ; Jun. 16, 2010.

38 Int'l Fund for Horses; Atamanenko moves to ban horse meat for human consumption in Canada; Tuesday's Horse; <http://wp.me/p6VVi-2P9> ; Jun. 17, 2010.

IV. Opposition to Horse Slaughter

Formal and Informal Polls

State and nationwide polls show that the greater part of the American population is strongly opposed to horse slaughter:

In 1995 - A national call in television poll resulted in 93% of callers demanding that "the killing of horses for meat be banned."

In 1997 - A state-wide poll taken in California revealed that 88% of those questioned were opposed to horse slaughter.

In 1999 - A poll conducted in New York State yielded the following results:

- 91% considered horses companions, recreational or sporting animals -
- 72% would never eat horse meat -
- 73% believed that the manner that horses are slaughtered is cruel and inhumane -
- 81% personally opposed the practice of horse slaughter.³⁹

These numbers have not changed significantly.

"Most of the people in this country want to see slaughter ended," notes Karen Pomroy of Equine Voices, an Arizona-based horse rescue organization for horses abused by the pharmaceutical industry and slated for slaughter. "The newest polls say 85 percent. For years we've been trying to get laws through, but too many pockets are being lined in Washington while foreign companies are making millions of dollars by killing our horses."⁴⁰

Congressional Vote

A legislative vote in the U.S. House of Representatives further demonstrates the will of the people.

On September 7, 2006, Bill H.R. 503, a comprehensive proposal to ban the slaughter of horses for human consumption as well as the transport for slaughter elsewhere passed overwhelmingly in the House of Representatives by roll call vote. "The totals were 263 Ayes, 146 Nays, 23 Present/Not Voting."⁴¹

The bill died as it was held up by pro-slaughter Senator Conrad Burns and was not allowed to come before the Senate for a vote.⁴²

No longer a Senator, Burns' Montana 2006 milestones include being selected by Time Magazine as one of America's Five Worst Senators,⁴³ and in September 2006 as one of The 20 Most Corrupt Members of Congress by the Citizens for Responsibility and Ethics in Washington.⁴⁴

39 Equine Advocates; Horse slaughter an American disgrace, an American shame; <http://www.equineadvocates.com/hs/slaughterprintout.html> ; 2000.

40 McNamee, Gregory; Horse slaughter in America; Encyclopedia Britannica Blog; <http://tiny.cc/btztst> ; Aug. 4, 2007

41 H.R. 503; 109th Congress; <http://www.govtrack.us/congress/bill.xpd?bill=h109-503> ; 2005-2006.

42 HorseIncorp; <http://www.horseincorp.org/Slaughter.html> ; undated.

43 Conrad Burns: Shock Jock, America's Five Worst Senators; *Time Magazine*; <http://tiny.cc/lhsea> ; Apr. 14, 2006.

44 20 most corrupt members of Congress: Burns, Frist, Santorum et al; *The Huffington Post*; <http://tiny.cc/3yxci> ; Mar. 28, 2008.

Re-Opening of Horse Slaughter Plants Fought

Despite protests to end slaughter, some states in the U.S. have attempted to re-open horse slaughter facilities.

In May of 2009, a new Montana state law, HB 418, was passed that invites private investors to develop horse slaughtering facilities in that state. However, it faces many challenges, one of which is the opposition to horse slaughter by state residents and veterinarians, together with other issues such as legal, environmental and economical.

An excerpt from an *Equestrian Magazine* news release is a measure of the distaste among the citizens of Montana;

"Tens of thousands of humanitarians across Montana are opposed to horse slaughter. Survey after survey has shown that more than 70 percent of all Americans oppose the practice, where living horses have their throats slit and are dismembered while hanging upside down as they bleed to death to feed Frenchmen hungry for their poisonous chemically tainted meat. A poll on a respected on-line paper in Montana on the day of the vote reflected 76% of readers against building a plant."⁴⁵

Dr. Lisa Jacobson DVM states:

"As a Montanan and practicing equine veterinarian, I strongly oppose HB 418. I am a member of both AVMA & AAEP; however, these organizations misrepresent the views of their members. Their pro-horse slaughter stance is not based on a member survey.

"Equine slaughter plants are documented to be very inhumane. Documents recently released by the USDA regarding horse slaughter in the U.S. make clear the unmistakable brutality inherent to the commercial slaughter of horses. Contained in the 906 page document covering eleven months of 2005 are 800 photos, showing horses with their eyeballs dangling, their legs ripped off, and even newborn foals." (See FOIA documents at <http://www.kaufmanzoning.net/>)⁴⁶

Dr. Caroline M. Betts, PhD, Associate Professor, Department of Economics at the University of Southern California stated:

"We are currently being inundated with arguments that the reintroduction of equine slaughter on U.S. soil is 'necessary'. The only thing it is necessary for is to fill the pockets of the big breeders and their agricultural associates, and perhaps the pockets of a bought politician or two. Apparently the senators and representatives of Montana who just passed a bill to introduce a new horse slaughter plant there care more about fulfilling those needs, than the fact that 85 percent of their own state citizens strongly object to the proposal."⁴⁷

Documented Cruelty

There are countless reasons to oppose horse slaughter taken from citations of information presented during hearings on anti-horse slaughter legislation. The following are two of the many accounts of the horse slaughter industry.

⁴⁵ *Equestrian Magazine* news release; Horse slaughter; The snow job in Montana will melt.

⁴⁶ Ibid.

⁴⁷ Betts, Caroline M., PhD; The true economics of horse slaughter; <http://tiny.cc/ppq35> ; via *Horseback Magazine*; 2009.

Testimony

Liz Ross, federal policy adviser to the Animal Welfare Institute in Washington, D.C., testifying before a Congressional Subcommittee, states:

"Dozens of horses were already in the kill-pens destined for slaughter. Of those horses that went through the auction ring I was able to purchase three, all of whom undoubtedly would have otherwise gone to slaughter. One was in such bad shape that she should have never been brought through the ring and we had her euthanized on the spot. The other two were placed at an equine rescue facility in New Jersey where they still live today. "The pure animal suffering and terror I witnessed that day at New Holland was . . . fundamentally disturbing as was everything I subsequently learned about the horse slaughter industry.

"In slaughter, horses suffer long before they reach the slaughterhouse. Crammed onto double deck trailers designed for cattle and sheep, horses travel in a bent manner for more than twenty-four hours without food, water or rest. In fact, so paltry are current regulations and so brutal is the trade that heavily pregnant mares, blind horses and those with broken limbs are regularly sent to slaughter.

"It is also noteworthy that in Mexico the captive-bolt gun is often passed over in preference to the 'puntilla' knife which is used to stab the horse in the spinal cord to the point of paralysis before the animal is strung up and quartered, often while still alive. In fact, one of the Mexican plants that was the subject of an undercover investigation exposing this horrific practice employs lobbyists who work the halls of Congress to defeat this bill. Mr. Chairman, this is pure animal cruelty, through and through, and it must end."⁴⁸

Testifying before Congress, Dr. Nicholas Dodman, BVMS, MRCVS, Professor, Section Head and Program Director of the Animal Behavior Department of Clinical Sciences at Tufts' Cummings School of Veterinary Medicine in North Grafton, Massachusetts, states:

"Horse slaughter has never been considered by veterinary professionals to be a form of euthanasia. Congress and the general public must hear from veterinarians that horse slaughter is not and should not be equated with humane euthanasia. Rather, the slaughtering of horses is a brutal and predatory business One need only observe horse slaughter to see that it is a far cry from genuine humane euthanasia."⁴⁹

Video Documentation

Horrors of the carnage that takes place inside Canadian horse slaughter plants is well documented.

The Canadian Horse Defence Coalition (CHDC) released video footage in two horse slaughter facilities, Bouvry Exports (Fort MacLeod, ALTA) and Viandes Richelieu (Massueville, PQ), taken in February, 2010.

Both of these videos exposed practices that fail to meet humane slaughter standards used by the Canadian Food Inspection Agency (CFIA) to audit Canadian slaughterhouses. These plants are clearly mismanaged and even in the presence of CFIA inspectors, abuse prevails.

48 Allen, Laura; Animal Law Coalition; Excerpts of information presented during hearings on the 2008 anti-horse slaughter bill; <http://tiny.cc/y6r6b> ; Jun. 24, 2009.

49 Testimony in Support of H.R. 6958, Prevention of Equine Cruelty Act of 2008; http://www.horsefund.org/resources/Dodman_Testimony_HR6598_080731.pdf ; Jul. 31, 2008.

A statement from the World Society for the Protection for Animals describes the tragic scenario.

"It is clear that neither the facilities nor the behavior of the personnel shown are suited to the humane slaughter of horses, and that extreme suffering results for many individual animals. Problems include failure to restrain each animal's head properly before shooting, shooting from too great a distance, shooting in the wrong part of the head or body, failure to follow up with an immediate second shot in animals that were not killed by the first, hoisting apparently conscious animals, and - in the case of the Richelieu plant - cruel handling and treatment of the horses, including excessive whipping and overuse of an electric prod as well as an apparent callous disregard for the animals' suffering. An additional cause of very major concern is the presence of what appear to be either plant supervisors or inspectors who observe the employees' actions and yet do nothing."⁵⁰

Dr. Nicholas Dodman, BVMS, MRCVS, states:

"Noise, blood and suffering is what you get at the Bouvry equine slaughter plant: Horses kicking after they have been shot, sinking down and rising up; sometimes periods of struggling or paddling before a second or third shot has to be administered. This atrocity goes against all veterinary guidelines for humane euthanasia.

Terror and suffering is the rule at this equine house of horrors ... and all in the name of the gourmet meat market."⁵¹

This sweeping investigation stirred much controversy and outrage with the public especially after the CFIA when confronted with the violations of their own regulations, found no major deficiencies, or intent of abuse toward the horses. Even the Calgary RCMP who probed the allegations acquiesced to this ruling. Based on this video documentation, it seems surreal that the RCMP could find no evidence of cruelty.

The public in both Canada and the U.S. were appalled by the government's apathetic reaction to this situation given that this was the second time in two years that undercover footage of horse slaughter operations in Canada revealed horrific and inhumane treatment of slaughter horses.

The Grassroots Movement

There will always be animal welfare groups, advocates and horse loving citizens continually working to shut down any horse slaughter operations that may find a way to open.

These groups of individuals work tirelessly to recruit their friends, families and colleagues to the anti-horse slaughter movement, urging them to rise up against the brutal practice of horse slaughter.

"I think the recent press about the wild horse roundups has shed light on our country's dirty little secret, horse slaughter", said Shelley Abrams, co-founder of Americans Against Horse Slaughter (AAHS). "The wild horse advocates and organizations that have worked for so many years to protect the wild horses have done a wonderful job of creating mass awareness to the general public through the media and that has inspired the lay person to learn more." Abrams added.⁵²

Laura Allen of the Animal Law Coalition adds:

50 Chambers of Carnage, CHDC; <http://www.defendhorsescanada.org/ChambersofCarnage.html> ; March 2010.

51 Canadian Horse Defence Coalition; Canadian Slaughterhouse Horrors; <http://tiny.cc/clhtx> ; May 7, 2010.

52 AAHS; Man's best friend campaigns to end horse slaughter; <http://tiny.cc/sw1px> ; Jan. 27, 2010.

"Horse slaughter is nothing more than abuse and it is being inflicted upon an animal that has never historically been considered a food animal, but rather a working partner and friend to man. An animal used primarily for pleasure, work, recreation and sport. The lies of the horse slaughterers can't stand up to the graphic footage of the realities."⁵³

Racing Opposition

Several major racetracks oppose horse slaughter.

Suffolk Downs, located in East Boston, became the first track in the country to implement an anti-slaughter policy in June 2008. Churchill Downs, Santa Anita Park, Gulfstream Park and a host of other venues have moved to adopt similar policies since then.

The New York Racing Association (NYRA) announced in December 2009 that they are introducing an official anti slaughter policy whereby offending horsemen would be harshly penalized. The penalties are stiff. Any owner or trainer who is caught selling either directly or indirectly a horse to slaughter will have their stalls permanently rescinded and prohibited from racing on all New York tracks.⁵⁴

The guidelines also encourage horsemen to use and support horse rescue and retirement adoptive initiatives as a recourse to slaughter.

"We are fully committed to protecting our sport's equine athletes" said NYRA president, Charles Hayward. "This policy sends the message that horse slaughter will not be tolerated and that those participating in this practice, either knowingly or for lack of due diligence, will not be welcome at Aqueduct, Belmont Park, or Saratoga."⁵⁵

V. Alternatives to Horse Slaughter

With the devastated economy, its slow recovery and the closure of all horse slaughter facilities in the U.S., pro-slaughter groups want you to believe there is no alternative. A study examining horse slaughter trends in the United States, Canada and Mexico carried out by researchers in conjunction with Animal Law Coalition shows otherwise.

Backed by data from the United States Dept of Agriculture, the Canadian Food Inspection Agency, the Bureau of Labor Statistics and other government and private sources, the conclusion was that the demand for horse meat is controlled by foreign markets rather than a surplus of unwanted horses. Europeans and Asians regard horse meat as a delicacy.⁵⁶

John Holland, senior analyst for AAHS (Americans Against Horse Slaughter) explains:

"Slaughter is useless as a tool for controlling the unwanted horse population and instead simply creates a market that competes with potential buyers of horses and encourages a continuous supply.

"The trends are irrefutable. We found that equine abuse levels are clearly linked to economic conditions but that slaughter trends were antithetical to them for most of the study period.

53 Allen, Laura; Animal Law Coalition; Native Americans Proved Not to be Proponents of Horse Slaughter; <http://tiny.cc/zw02m> ; Jul. 26, 2009.

54 Thoroughbred Retirement Foundation; <http://tiny.cc/nhqmw> ;undated.

55 Silver, Dan; NYRA Announces Anti-Slaughter Policy; <http://tiny.cc/0v7d2> ; Dec. 10, 2009.

56 Stern, Peter; What's new at the dinner table; Tuesday's Horse; <http://wp.me/p6VVi-J> ; May 21, 2007.

"The demand for horse meat creates a market where horse slaughter "kill buyers" compete with other people who want to buy horses. This encourages owners to supply that market through over-breeding horses, for example."⁵⁷

Essentially what this implies is that if horse slaughter for human consumption is illegal as well as the transport of horses across U.S. borders to Canadian or Mexican slaughterhouses, then there will be no incentive for these individuals and the markets will turn elsewhere to find their meat.

Holland goes on to say:

"Those demanding horse meat would simply look to other countries for horses. The study also shows that the market has quickly adjusted to large decreases in slaughter in the past, indicating that there would be no significant or sustained increase in unwanted or abandoned horses."⁵⁸

To further support this premise, the American Quarter Horse Association (AQHA), an organization that is pro-horse slaughter, accounts for more than half of all horses going to slaughter. Astoundingly, the AQHA encourages breeders to breed without consideration so the surplus continues. "Many are culls which breeders were unable to sell."

In a slanted survey undertaken by the pro-slaughter American Horse Council and Unwanted Horse Coalition, remarkably, only 30% of these "stakeholders" thought this was contributing to the over population and neglect.⁵⁹ It is important to note that no anti-slaughter groups or individuals were invited to participate in this survey.

R.T. Fitch, author of "Pro-Slaughter Group Issues Tainted Survey Results," comments:

"Americans should be outraged that Congress allows needed legislation to languish and continually be blocked and stalled by special interest groups that perpetuate the over breeding of horses."⁶⁰

Simply stated, if there is no easy way to dispose of unwanted horses, fewer horses will be bred.

Moreover, Dr. Patricia Hogan, DVM, ACVS, a veterinary surgeon and AAEP member states:

"If we want to be "part of the solution," then we truly need to examine our role in the problem, and actually put our own house in order. Put some 'teeth' into our bite. But that commitment needs to come from within our own circle before we can expect our advice to be heeded by other factions within the racing industry. If we had been truly living by the mantra of "putting the horse first," many of the issues we are facing today would simply not exist. United we stand, divided we fall. That statement has never been more true for horse racing; and for the veterinary community supporting it."⁶¹

It is a given fact that the depressed economy is making it harder for some horse owners and breeders to adequately care for their animals. Yet this is no reason to re-introduce a practice morally and socially unacceptable that is rife with unspeakable abuse, adding nothing to the economy and overwhelming the environment around it. These so-called "unwanted horses" ... "are a serious problem....and so broad it

57 Allen, Laura; Study shows ban on horse slaughter would not result in numbers of unwanted horses; Animal Law Coalition; <http://tiny.cc/gl7vr> ; Jun. 17, 2008.

58 Ibid.

59 Allen, Laura; Animal Law Coalition; A study of equine slaughter/abuse patterns following closure of horse slaughter plants in US; <http://tiny.cc/6hwkd> ; Jun. 18, 2008.

60 Fitch, R.T.; Pro-slaughter group issues tainted survey results; <http://tiny.cc/8r4ht> ; Jul. 10, 2009.

61 Hogan, Patricia, DVM, ACVS; Putting the horse first? Equine Advocates via *Bloodhorse*; <http://tiny.cc/s9hvvq> ; 2009.

impacts the entire United States, not just the horse racing industry. Perhaps it's time for a wake-up call." says Tom LaMarra in an article posted in 2008 by *Bloodhorse.com*.⁶²

The pro-horse slaughter AQHA continue to encourage rampant over breeding of horses, complain about how many "unwanted horses" there are, then reportedly lobby to defeat federal legislation banning horse slaughter and pass state resolutions to bring back horse slaughter back to the U.S. Yet the ruse continues as shown in this statement by Tom Persechino, senior director of marketing; "it's not practical to force breeders to limit the number of horses they breed, but it is feasible to educate them. He said the Unwanted Horse Coalition "believes teaching people to own responsibly will help lower the number of unwanted horses."⁶³

Even so, there are movements within the horse industry to address the surplus horse dilemma.

These strategies are aimed at reducing the number of unwanted horses on the front end through responsible breeding, and on the rear end through rescue/retirement facilities, retraining for alternative careers, and low-cost euthanasia options.

The main objective of these policies is to improve the quality of life of unwanted horses and to reduce their numbers. Or are they?

The horse industry has among them "do-gooder" organizations such as the American Quarter Horse Association (AQHA), the American Veterinarian Medical Association (AVMA), the American Association of Equine Practitioners (AAEP), the American Horse Council (AHC), and the Unwanted Horse Coalition (UHC) among others, and a new group called the Equine Health and Welfare Alliance (EHWA).

And what do all of these organizations have in common? They are all pro-horse slaughter.

Masked behind policies designed to have you believe that they are looking to "focus solely on issues and mechanisms that protect, promote and preserve adequate humane measures of basic needs for the horse" lurks the specter of their final solution, death in a slaughterhouse.

As Economics Professor Dr. Caroline Betts, PhD cleverly points out in her article, "The economic reality of scarce and toxic horses":

"I was not surprised that Dr Tom Lenz, past president of the American Association of Equine Practitioners, readily credited the organization for coining the phrase 'Unwanted Horse' in his article 'The Unwanted Horse in the United States – International Implications.'⁶⁴

"It is a coup d'etat of language choice for those American equine practitioners lobbying hardest to maintain a U.S. export market for horse meat. Dr Lenz manages to equate 'unwanted' with 'slaughtered for human consumption' and with 'should be slaughtered for human consumption, but aren't, because we need additional slaughter plants on American soil.'

"Horses slaughtered are neither privately nor socially 'unwanted,' for they command a positive price both at auction and at the slaughter plant gate - and I suspect that if they did not, we would not be having this debate at all. As any Economics 101 student can tell you, positive prices signal not 'unwanted-ness,' but scarcity."

Dr. Betts concludes:

62 LaMarra, Tom; Unwanted horses: How serious a problem? Bloodhorse; <http://tiny.cc/50k6w> ; Jun. 19, 2008.

63 Hogan, Patricia, DVM, ACVS; Putting the Horse First? <http://tiny.cc/s9hvvq> .

64 Lenz, Tom; The unwanted horse in the United States – international implications; <http://tiny.cc/4dcag> ; Feb. 5, 2010.

"The flesh of 'unwanted horses' is acknowledged to be toxic when consumed by humans. And who among the politicians, equine practitioners, and veterinarians lobbying to prevent a ban on the slaughter of American horses - in the name of equine welfare - would wish to be responsible for the deleterious impact for human welfare associated with promoting the slaughter of toxic horses?"⁶⁵

In a letter to the editor of *HorseBack Magazine*, Dr. Betts proposes some reforms:

"Why, instead, aren't these states considering the establishment of temporary state funded horse rescues, with jobs in them that provide tax revenue, until the economy recovers and the horses can find homes? Why aren't they providing additional funding and jobs for Humane Societies and Animal Control agencies to cope with whatever is being claimed that they are having to deal with? Why not do something that BENEFITS HORSES as well as creating some jobs? And why not impose a state tax on horse breeders to help fund it all?"⁶⁶

In an article entitled "Stop Horse Slaughter: Is There Another Solution?" the author suggests we should enforce laws or rules that govern the ownership of a horse or horses.

"Maybe we should be required to obtain a license for breeding horses. Maybe we should put limits on how many horses may be bred a year. Maybe we should have to be licensed to own a horse just like we have to be licensed to drive a car or to go hunting. With horse ownership, and even breeding ability, open to just anyone, there are too many people who can't or don't know how to care for their animals and too many horses who aren't useful. We, not the slaughter houses, are our horses' worst enemy."⁶⁷

Congressional Intervention

It appears that legislators in Washington may have some ideas of their own.

Stephanie Sellers, in an editorial letter to *The Pilot* observes:

"The 112th Congress is looking for ways to raise revenue.

There are approximately 9.2 million horses in America. Applying fair taxes to horse owners would create significant revenue and spur the economy. Taxing horses would also create a greater sense of responsibility for horse owners.

Citizens take better care of things they have to pay for. Taxing horses would also deter horse overpopulation, as breeding would be minimized. Redeeming pride for America's much-admired companion animal would make passing bills to halt horse slaughter more favorable."⁶⁸

Probably the most relevant advantage of the taxation scheme is related to the taxation of breeders, not the average horse owner. Currently breeders enjoy a breeding incentive by way of millions of tax dollar write offs. Ideally, these breeding incentives and prohibitive tax write offs should be abolished and taxes enforced.

Overactive breeders are the root of the surplus horse situation devaluing the market. This would return horse breeding to quality over quantity and benefit the industry as a whole.

65 Betts, Caroline M. PhD; HorseTalk; <http://tiny.cc/v1glw> ; Feb. 17, 2010.

66 Betts, Caroline M. PhD; Letter to the editor, *HorseBack Magazine*; <http://wp.me/p6VVVi-3T6> ; Mar. 25, 2009.

67 RegardingHorses.com; Stop horse slaughter: Is there another solution?; <http://tiny.cc/8m182> ; Jan. 11, 2008.

68 Sellers, Stephanie; They Tax Horses Don't They?; ThePilot.com; <http://tiny.cc/og3bs> ; Feb. 3, 2011.

Rescuers to the Rescue

The quest to resolve the current problem of the surplus horse population continues in earnest.

In December, 2010, a group of leading equine rescue and sanctuary operators from across the United States put together a paper proposing a six-point plan (outlined below) to eliminate the slaughter of American horses.

The premise is based on viable interim alternatives and stipulates the provision that the commercial equine industry and the horse rescue sanctuary community collaborate rather than disagree on the much debated subject of horse slaughter.

Six-Point Plan to Eliminate the Slaughter of America's Horses

1. The creation of state and regional managed reserves to hold large numbers of horses safely until they can be absorbed back into the system.
2. Selected expansion of existing sanctuary capacity for rescues that establish business plans allowing them to accommodate and care for additional horses in their operations if more facility space is provided.
3. Expand existing and develop new sponsored foster home networks in which rescued horses are placed and supported with private individuals who have the facility and desire to keep horses, but are financially unable to.
4. Expand the concept of in-place rescue to keep more horses with dedicated and committed owners in their current homes with temporary financial or feeding assistance.
5. The creation of state and regional training centers and networks, in which younger, healthier horses, which represent most of those going to slaughter today, can receive the training they need to lead productive lives and therefore be much more eligible for adoption to new homes.
6. A relatively new development in equine rescue, a growing network of sanctuary operators who work together to place horses they cannot accept themselves, has saved literally thousands of horses in the past two years.⁶⁹

Racing to the Rescue

Together with over-breeding and the economic downturn in the U.S. the financial burden of owning a horse has become onerous for many individuals. Many racehorses no longer able to win have historically been sold to slaughter plants. Now more than ever this has become routine as it presents an easy way to dispose of an animal that no longer is turning a profit.

In response to the impact of these forces on all aspects of the Thoroughbred industry, The New York Thoroughbred Breeders, Inc. (NYTB) is proposing a task force that includes the New York Racing Association, the New York Thoroughbred Horsemen Association, Finger Lakes Gaming & Racetrack and the New York State Racing & Wagering Board for the purpose of broadening programs that assist thoroughbred owners forced with selling their horses while developing a policy that punishes any owner, breeder or trainer that either directly or indirectly contributes to an outcome where a horse is knowingly sent to slaughter.⁷⁰

69 Warren, Allen (in collaboration); Horse Rescue Alternatives to Horse Slaughter; <http://wp.me/P6VVi-3DC> ; December 2010.

70 NYTB Press Release; New York Thoroughbred Breeders Seek Task Force to Strengthen Horse Rescue Efforts; Tuesday's Horse; <http://wp.me/p6VVi-3Ls> ; Feb. 8, 2011.

More recently other organizations have stepped up to the plate in terms of supporting off-the-track Thoroughbreds. On February 17, 2011, Frank Stronach, chairman and CEO of MI Developments Inc., announced the formation of the Gulfstream Park Thoroughbred After-Care Program to help find suitable homes for retired Thoroughbreds.⁷¹

Additionally, The Oklahoma Horse Racing Commission has approved a rule that would designate about \$100,000 a year out of a breeder's incentive fund to help care for retired racehorses. The proposal would use money from the Oklahoma Breeding Development Fund Special Account to help pay for the retraining and care of Oklahoma-bred thoroughbred racehorses.⁷²

Although racehorses are only one sector of the horses at risk, perhaps with these developments others will follow suit and reduce the number of horses that find their way to the slaughter pipeline.

VI. CONCLUSION

The horse slaughter industry is an insidious, brutal and predatory business that exists for one reason and one reason only. Horse slaughter exists to supply the demand for horse meat and to profit from it. Horse slaughter is not a humane end to a horse's life. Horse slaughter is not euthanasia.

When horse slaughter comes to town, environmental hazards, economic woes, and the stigma associated with the cruelties inherent to killing horses for their meat, are only a part of the price they will pay.

Putting those considerations aside, relevant as they are, what about the horses?

Horse slaughter is a cruel betrayal of an animal who has made it possible for America to develop the richness it enjoys.

As Laura Hillenbrand, author of "Seabiscuit" says,

"Here are these exquisite, immensely powerful creatures, who willingly give us their labor in return for our stewardship. They have attended us throughout history, bearing us across frontiers and into battle, pulling our plows, thrilling us in sport, warming us with their beauty. We owe them more than we can ever repay. To send these trusting creatures to slaughter is beneath their dignity and ours."⁷³

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71 Welsch, Mike; Stronach Forming New Equine Retirement Program; DRF; <http://tiny.cc/ev2pt> ; Feb. 17, 2011.

72 Associated Press; OK Racing Officials OK Help for Retired Racehorses; via Tuesday's Horse; <http://wp.me/p6VVi-3Ny> ; Feb. 19, 2011.

73 Save the Horses; Quotes against horse slaughter; <http://tiny.cc/6dlldb> ; 2009.

EXHIBIT 18

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Credit: Vickery Eckhoff/N

Date: January 08, 2012

In pictures: Life next door to the Dallas Crown horse slaughter plant in Kaufman, Texas



As Mayor from 2003-2007, Paula Bacon helped shut Dallas Crown, ending decades of extreme environmental violations by the horse slaughterhouse, which is owned by the Belgian meat packer, Chevideco.

"They said they were good corporate citizens," Bacon states in a recent interview. "I believe it's more accurate to describe them as corporate thugs."



Dallas Crown Horse Slaughter Plant—Kaufman, Texas (2005)

Official and city staff documents describe Dallas Crown's pervasive environmental violations, including "blood flowing east and west in the ditches from your plant," "It has been over 59 days and no apparent cleanup has occurred," "Your system has not improved and subsequently it has gotten a lot worse," "Words cannot express the seriousness" of recent violations and the "adverse effects on the waste water treatment plant," and "Please be sure trailers are secured before leaving your premises to prevent spills," noting also "bones and blood laying in front of the facility," problems with bones and parts in neighboring yards and the attraction of "dogs and other animals."

Handling Dallas Crown's sewage was about to cost Kaufman \$6 million for a new waste water treatment plant. Within two weeks of the plant's closure, waste water plant capacity increased dramatically.



Dead Horse On Forklift at Dallas Crown Slaughter Plant—Kaufman, Texas (2005)

In 1996, Dallas Crown's plant manager promised to slaughter only out-of-state horses that had outlived their usefulness. These would be killed "in a fraction of a second," with a captive-bolt device, he claimed. Other promises included having a "SD" inspector on site each day to ensure that the plant operates under government regulations and the plant will work under the guidance of the humane society."



Dallas Crown Holding Pens—Kaufman, Texas (2006)

Although Dallas Crown violated humane laws by accepting blind, lame, severely injured and untreated, sick horses from kill buyers, most of the horses slaughtered were healthy and fat, as residents of Kaufman observed by regularly watching the pens.

"There were all these shiny, groomed horses. Who shoes a horse and sends it to slaughter?" asks Bacon. "Someone had cared for and about these horses only a few days earlier."

"The stench was terrible," says Valine Aldridge, a nurse at Texas Health Resources Presbyterian Kaufman. She and her husband, Robert Aldridge, a respiratory therapist, own property abutting the plant, in a low-income black neighborhood. "The noise from clanging and whinnying when they unloaded the horses at midnight was just awful," he says.



Dallas Crown Horses—Kaufman, Texas (2005)

“There were great horse properties for sale in Kaufman back when the plant was operating, with sandy soil and big, mature trees and really great prices—just what my clients from the Dallas–Fort Worth area with horses were asking for,” says Paula Hooper Denmon, of Town and Country Horses Real Estate. “But they wouldn’t buy in Kaufman. They were afraid they’d come home from work and find their barns empty. They didn’t even want to drive into town. It was tainted.”

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Dallas Crown Humane Violations—Kaufman, Texas (2005)

From Jan. 2004 to Nov. 2005, USDA inspectors at Dallas Crown photographed violations committed under the Commercial Transport of Equines Slaughter Act, but didn't act on them, according to a [906-page USDA document](#) for that period obtained under the Freedom of Information Act.

The document showed extensive, injuries, some intentionally inflicted by kill buyers and transporters, like eyes gouged out to keep horses from fighting on the trailers, especially since stallions were packed in next to geldings and mares. Both mares and geldings were also subjected to intentional blinding.



Dallas Crown Humane Violations—Kaufman, Texas (2005)

Horses suffering from severed legs, compound fractures, head and other serious injuries, still births and death by trampling in double-decker trailers were some of the many photographs captured in the [906-page SD document](#).

No licenses were revoked and no penalties were assessed until 2003 when one buyer, Leroy Baker of Ohio, was ordered to pay \$62,000—but refused, calling the charges “bogus.” In May, 2003, following public pressure, the US District Court for the Northern District of Ohio ordered garnishment of Baker’s bank accounts to collect the outstanding monies.



Dallas Crown Offal Container—Kaufman, Texas (2006)

- Open containers of bloody hides, horse heads, legs and offal were left outside and also transported, leaking blood, through the community. “Seeing horses’ carcasses on the conveyor belt would break anyone’s heart,” says Qualine Aldridge.



600 Gallon Flood Spill Outside Dallas Crown Plant—Kaufman, Texas (200)

“Sometimes, when they killed, they didn’t move the container for a week. That’s how long it took to fill it with guts,” says Robert Eldridge. “The longer it sat, the more it stunk, the more flies and vermin it attracted.”

Julie Caramante, an independent equine cruelty investigator from Houston, describes following a Dallas Crown rig and seeing body parts fall on the highway. “The cops pulled it over. I watched as the driver was forced to climb down into the container to secure the load,” says Caramante.



Qualine Eldridge, Robert Eldridge and Mayor Paula Dacon (2005)

Kaufman-born Robert Eldridge and his wife, Qualine Eldridge, have lived in the "oggy Bottom" neighborhood bordering the plant since 1945. In September, 2005, Qualine and Robert traveled with Mayor Dacon to Capitol Hill to speak out on the plant's effect on their neighborhood, property and town.

"One by one, our neighbors couldn't take it and left the neighborhood. It was horrible," Robert Eldridge says. "It stunk like manure and decaying flesh. Everybody was affected. The kids didn't want to go out and play."

Qualine said, "It was all about money for Dallas Crown. They wanted the plant, but not in their own backyards. Just like Meltex, which was in a low-income Hispanic neighborhood in Fort Worth. They didn't care about us."



□ulture in Tree—Kaufman, Texas (2005)

□ultures, snakes, rats, cockroaches and flies plagued neighbors while Dallas Crown was operating. □We get an occasional vulture now,” □obert □ldridge.



Dallas Crown Horse Slaughter Plant—Kaufman, Texas (200□)

The Website of Dallas Crown's Belgian owner, Chevideco, features the Kaufman plant alongside five other worldwide slaughterhouses operating today in Belgium, Romania, France, Argentina and Mexico.

"Chevideco always has clear engagements concerning a dignified treatment of live animals, both during transport and during their stay in the slaughterhouse. At the moment of purchase, Chevideco always pays utmost heed to a qualitative selection of the animals. Both during and after the slaughtering, the veterinary services guarantee the inspection of the meat intended for human consumption. All operations within Chevideco are subject to the most stringent HACCP quality standards and ISO 2009-2010 standards. The entire process takes place under the most rigorous hygienic and animal-friendly conditions."

"From respect for animals," one of four main subpages featured on Chevideco's Web site homepage

"New product development includes a new branch of the meat industry, via the transformation of meat offal into pet food," says [Chevideco's web site](#).



Town Square With Few Shops and Cafes—Kaufman, Texas (2012)

Kaufman is being revitalized since Dallas Crown's closing. Property crimes fell by half, real estate prices have gone up and the town has been in a development and expansion phase. There's a new Baptist church youth community center built near the Dallas Crown facility and an 80-unit affordable senior/citizen apartment complex spearheaded by the Kaufman Neighborhood Development Organization, Inc., a nonprofit organization.

"We go outside, now. We can barbecue and the kids can play. There's a much better smell," says Robert Eldridge. "If they ever try and come back," he added, "we'll fight them. We're not giving up our neighborhood. We won't let them come back."

EXHIBIT 19

Open Letter to State Legislatures Considering Pro-Horse Slaughter Resolutions

Posted Feb 13, 2009 by lauraallen

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[Horse Slaughter](#)



Former Mayor Paula Bacon
City of Kaufman
Kaufman, TX 75142

Dear State Legislator:

You will soon be asked to vote on ... legislation regarding the commercial slaughter of American horses of which you probably have very little firsthand knowledge. No doubt you have heard from lobbyists and organizations who want you to support the practice, but before you do, you should ask yourself why the residents of Texas and Illinois worked so hard to rid their states of their horse slaughter plants. The answer may surprise you.

As a mayor who lived with this plague in her town for many years, who knows what the horse slaughter industry really is and what it does to a community please allow me to tell you what we experienced. The industry caused significant and long term hardship to my community which was home to Dallas Crown, one of the last three horse slaughter plants in the United States.

All three plants were foreign-owned, and since the market for horsemeat is entirely foreign, the industry will always be dominated by these foreign interests. The corporations involved in this industry have consistently proven themselves to be the worst possible corporate citizens.

The Dallas Crown horse slaughtering facility had been in operation in Kaufman since the late 70's and from the beginning had caused problems both economically and environmentally. I have listed some of the specific issues below.

I will gladly provide you with detailed reports from my former City Manager, Police Chief, and Public Works Director regarding odor and wastewater effluence violations at the Dallas Crown horse slaughter plant in the City of Kaufman.. The reports reference "decaying meat [which] provides a foul odor and is an attraction for vermin and carrion," containers conveyed "uncovered and leaking liquids," there are "significant foul odors during the daily monitoring of the area," and "Dallas Crown continually neglects to perform within the standards required of them."

Therefore, in August of 2005, our City Council decided by unanimous decision to send the Dallas Crown issue to the Board of Adjustments for termination of their non-conforming use status. In March of 2006, the Board of Adjustments voted to order Dallas Crown closed, but the plant was able to tie the enforcement up in the courts until they were finally closed under state law in February of 2007.

Dallas Crown repeatedly described itself as a "good corporate citizen." I will be straightforward in asserting that they are the very antithesis of such.

- o Dallas Crown had a very long history of violations to their industrial waste permit, 'loading' the capacity of the wastewater treatment plant.
- o Dallas Crown denied the City access to their property for wastewater testing beginning October 1, 2004 until July 6, 2005, despite requirement by city ordinance, city permit agreement, and court order.
- o City staff reported that a \$6 million upgrade to our wastewater treatment plant would be required even though the plant was planned and financed to last through 2015.
- o Odor problems resulting from the outside storage of offal and hides over several days persisted not only in traditionally African-American neighborhood known as "Boggy Bottom", but at the nearby Presbyterian Hospital, the daycare center, and surrounding areas.
- o Transport of offal and fresh hides on City and state thoroughfares is conducted in leaking containers without covers.
- o City documents reveal an extended history of efforts to have Dallas Crown address various environmental issues. Reports include descriptive language including such as "blood flowing east and west in the ditches from your plant," "It has been over 45 days [it had been 59 days] and no apparent cleanup has occurred," "Your system has not improved and subsequently it has gotten a lot worse," "Words cannot express the seriousness" of recent violations and the "adverse effects on the wastewater treatment plant," and "Please be sure trailers are secured before leaving your premises to prevent spills," noting also "bones and blood laying in front of the facility," problems with bones and parts in neighboring yards and the attraction of "dogs and other animals."
- o In response to 29 citations for wastewater violations, each accompanied by a potential fine of \$2,000, Dallas Crown requested 29 separate jury trials, potentially causing yet another economic strain to the City's budget. We could, of course, not afford to litigate in order to extract the fines
- o Dallas Crown took 11 months to submit a mandatory "sludge control plan" to assist efficient operation of the wastewater treatment plant though City staff requested it orally and in writing many times.
- o The City Manager advised me that the City would have to spend \$70,000 in legal fees because of Dallas Crown problems, which was the entire legal budget for the fiscal year.
- o During this period, Dallas Crown paid property taxes that were less than half of what the City spent on legal fees directly related to Dallas Crown violations.
- o Generally, Dallas Crown has the economic ability to prevail, to exceed the constraints of the City's budget.

Dallas Crown had a negative effect on the development of surrounding properties, and a horse slaughter plant is a stigma to the development of our city generally. I have since learned that these problems were mirrored at the other two plants. Fort Worth's Beltex horse slaughter plant also violated Ft. Worth's wastewater regulations several times, clogged sewer lines, and both spilled and pumped blood into a nearby creek (San Antonio Current, June 19, 2003). Texas State Rep. Lon Burnam, D-Fort Worth, whose district includes Beltex, and Rep. Toby Goodman, R-Arlington, fought hard against legislation that would have legalized horse slaughter in Texas in 2003.

The horse slaughter plant in DeKalb, IL had a similar pattern. It was destroyed by fire in 2002, and rebuilt in 2004. It was charged and fined by the DeKalb Sanitary District almost every month from the reopening until its closing in 2007 under a new state law for consistently exceeding wastewater discharge guidelines. I can provide you with the documentation of those violations. Like Dallas Crown, Cavel refused to pay their fines for years.

During this time, I learned that an estimated \$5 million in Federal funding was being spent annually to support three foreign-owned horse slaughter plants! And when the Dallas Crown tax records were

exposed in the city's legal struggle, we found that they had paid only \$5 in federal taxes on a gross income of over \$12,000,000!

Moreover, the parent company of Cavel has since moved its operations to Canada and continued to slaughter American horses. In Canada they have apparently become even more blatant, dumping huge untreated piles of entrails onto open ground and even using a tanker truck to discharge blood and refuse into a local river.

I have mentioned only the pollution issue, but this is but one negative aspect of horse slaughter. I have subsequently learned of a USDA document containing 900 pages of graphic photos that show the horrors that the horses were subject to. Behind the privacy fences of these plants, trucks arrived continuously and on those trucks was every form of inhumane violation one can imagine from mares birthing foals to horses with eyes dangling from their sockets and legs ripped from their bodies.

The more I learn about horse slaughter, the more certain I am: There is no justification for horse slaughter in this country. My city was little more than a door mat for a foreign-owned business that drained our resources, thwarted economic development and stigmatized our community. Americans don't eat horses, and we don't raise them for human consumption. There is no justification for spending American tax dollars to support this industry at the expense of Americans and our horses.

Sincerely,

Former Mayor Paula Bacon
Kaufman, TX
325-665-2043 cell

For more on pending pro-horse slaughter bills in state legislature, [read this](#).