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April 23, 2010

Ms. Carole Swan
President
Canadian Food Inspection Agency
1400 Merivale Rd, Tower 1
Ottawa, ON K1A 0Y9

Dear Ms. Swan:

Re: Horse slaughter practices in Canada

On behalf of the British Columbia SPCA and the Canadian Federation of Humane Societies (CFHS), I am writing to you to submit a report we have prepared on horse slaughter practices in Canada (enclosed). This March, I was presented with a set of DVDs from the Canadian Horse Defence Coalition (CHDC), which portrays continuous video footage from cameras mounted in two horse slaughter facilities. CHDC indicated that this footage had been filmed at Bouvry Exports (Fort MacLeod, Alberta) on February 18th, 2010 and at Viandes Richelieu (Massueville, Quebec) on February 22nd, 2010. The footage was submitted to me in my capacity as the Chief Executive Officer of the BC SPCA and as a CFHS Board Member and Chair of their Farm Animal Committee.

As you will see from the enclosed report, I assigned a BC SPCA staff veterinarian and our farm animal behaviour specialist to review the footage. They have done so in consultation with three independent Canadian veterinarians with significant equine expertise. The footage was audited using the American Meat Institute's 2007 audit forms designed by Dr. Temple Grandin for assessing the slaughter of cattle. Dr. Grandin has indicated to us through direct personal communication that these audit forms are appropriate for use in evaluating the slaughter of horses and that it is feasible to adequately audit many criteria by videotape.

Both audits resulted in a failure according to various audit criteria. Details are contained in the enclosed report. A graduate student of Dr. Grandin's has also audited this footage and Dr. Grandin tells us that his results are similar to ours.

Our observations result in some very serious concerns about the slaughter facilities and the practices employed in both of the aforementioned plants. The footage from both plants depicts slaughter practices that fail to meet acceptable industry standards (as per AMI Guidelines). In some instances, these practices constitute offenses under Canada's Meat Inspection Regulations – and perhaps also under other provincial or federal animal cruelty legislation.

In short, our observations do not convince us that horse slaughter in Canada is being consistently conducted to a humane standard that we find acceptable.

Our major concerns are outlined in the enclosed report, but I will also summarize them for you below.

1. The slaughter facilities provide fundamentally inadequate conditions for humane control and handling of horses:
 - The facilities at both plants are simply inadequate for effective restraint of horses.
 - The Bouvry facility is excessively noisy and the kill box too slippery to create a low-stress environment for the horses.
2. Plant employees demonstrate behaviours that are inconsistent with humane handling and stunning techniques:
 - Bouvry employees are not seen to use an approved method for checking consciousness (such as corneal reflex test) prior to suspending each horse. Witnessed in this footage within a few horse were at least two occurrences of horses being suspended and exsanguinated while still conscious.
 - When horses are not rendered unconscious on the first shot, the duration that elapses before a final effective shot is delivered is much too long, resulting in prolonged periods of distress to the animals involved.
 - At both plants, employees leave horses in the kill box for too long. This results in horses becoming increasingly agitated, particularly in the stressful environment presented at Bouvry.
 - Richelieu employees are seen to excessively whip and electrically prod horses.

Given that nearly two years have passed since serious concerns were raised about slaughter practices at the Natural Valley Farms plant, we find it most alarming that the CFIA's inspection programs could continue to allow such unacceptable practices to persist at Canadian horse slaughter plants. Our audit results demonstrate even worse outcomes for animal welfare criteria in the new footage from Bouvry and Richelieu than in the previous footage from Natural Valley Farms. We were frankly astounded by this outcome. In the enclosed correspondence dated May 4th, 2009, Mr. Paul Mayers indicated that the CFIA has established a third-party review team to review horse slaughter in Canada. He also indicated that "all federally registered facilities have CFIA staff in place during slaughter to confirm compliance with animal welfare practices." This statement implies that CFIA staff are physically present to witness the stunning and exsanguination of every animal. And yet, we know that this is simply not the case. Without witnessing these practices, CFIA staff are technically unable to "confirm compliance with animal welfare practices."

Despite the CFIA's indications that horse slaughter is being carefully monitored, practices at at least two plants in Canada continue to be below industry standards and in breach of Federal regulations, as is demonstrated by the video footage obtained. This is unacceptable to the BC SPCA and the CFHS.

I ask that you provide us with outcomes of your third-party review. Furthermore, I request an immediate response to all of the concerns elaborated in our report, demonstrating how the CFIA will provide an assurance that each of them will be promptly and adequately addressed to ensure horses do not suffer during commercial slaughter in Canada.

Let me be clear, the BC SPCA and the CFHS are interested in helping the CFIA find reasonable solutions to the identified concerns, rather than merely pointing out problems without any consideration to practical and constructive collaboration for improvement. However, due to the severity of the infractions observed on this latest footage and the earlier problems at Natural Valley Farms, we consider this issue to be of great and urgent importance to the welfare of horses at these plants and other plants across Canada. Accordingly, I request that you provide a comprehensive written response or verbal briefing in answer to our concerns no later than May 3rd, 2010. This should not present a problem we understand that the CFIA has already been in possession of the video footage for some weeks.

We understand that the solutions to these problems may not be simple, but significant progress towards eliminating the causes of these unacceptable practices must be accomplished swiftly, if public faith in the

CFIA's enforcement capabilities is to be restored. We believe that such solutions exist. For example, we postulate that the enormous increase in the volume of horses arriving in Canada for slaughter (up to an additional 30-40 thousand horses per year since 2006) may be an exacerbating factor for the welfare concerns identified. Operations staff and CFIA inspectors at these plants may simply not be capable of meeting regulatory requirements and industry expectations for ensuring humane treatment of animals with such a great number of horses passing through their kill lines each day, particularly when significant structural deficiencies in kill box design have been observed. That these plants tend to score worse on audit criteria as the day progresses support this claim, or it may simply point to plant facilities and processes that fail to prevent human fatigue from affecting the audited performance measures. Regardless, the importation of horses for slaughter is certainly an area that the CFIA should be addressing as part of an overall solution to this unacceptable situation. Regulatory decisions made in the USA must not be used a scapegoat for allowing compromised welfare standards in Canadian slaughter facilities.

In conclusion, it is also pertinent for me to raise the issue of the potential consequences of reduced horse slaughter capacity in Canada on unwanted horses. As the lead agencies in Canada on animal cruelty law enforcement and the main providers of care for neglected and abandoned animals, Canada's SPCA's and humane societies take these concerns very seriously. Our organizations, all of which are charitable organizations and many of which receive no funding from provincial or federal government, stand to bear the greatest burden of any as a result of a diminished capacity for euthanasia of unwanted horses. Despite this concern, we firmly assert that inhumane slaughtering practices cannot be condoned in a "lesser of two evils" approach, and support the suspension of any and all facilities who fail to meet the regulations. Moreover, in order to address some fundamental causes of horse oversupply, we plan to call for the appropriate government agencies and horse industry stakeholders to act promptly to reduce horse overbreeding and to offer subsidized services for the on-farm euthanasia of unwanted horses.

I look forward to your response.

Yours sincerely,

A handwritten signature in black ink that reads "Craig Daniell". The signature is written in a cursive style with a large, stylized 'C' and 'D'.

Craig Daniell
Chief Executive Officer, BC SPCA
Chair, CFHS Farm Animal Committee

Encl.

Cc:

Honourable Gerry Ritz
Minister of Agriculture and Agri-Food

Ms. Terra Johnston
Alberta SPCA

Dr. Warren Skippon
CVMA