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House of Commons
Ottawa, Ontario, Canada K1A 0A6

REGARDING BILL C-571 – An act to amend the Meat Inspection Act and the Safe Food for Canadians Act (slaughter of equines for human consumption)

To Alex Atamanenko:

[Equine Canada](#) is the leading national equine organization in Canada. Equine Canada is recognized by Sport Canada and the Fédération Equestre Internationale (FEI) as the national governing body for equestrian sport and recreation in Canada. It is the industry sector leader and as such is recognized and supported by Agriculture and Agri-food Canada.

It is Equine Canada's position that Bill C-571, if enacted:

- Will not enhance or add value to existing legislation for food safety in Canada
- Will not improve the humane welfare of horses in Canada, and
- Will cause serious implications for Canadian horse owners moving horses inter-provincially within Canada.

In response to the proposed Bill C-571, Equine Canada would bring to your attention the following points:

- The preamble to Bill C-571 references the following rationale for the proposed prohibition on moving horses and/or horse meat products:

*... Whereas horses are ordinarily kept as domestic animals for recreational and sporting purposes
... Whereas horses are not raised primarily to produce meat for human consumption; ... And
whereas horsemeat products for human consumption may contain prohibited substances ...*

While we recognize that the general public may share different perceptions on the status of horses, Equine Canada's position is that horses are multi-use livestock animals. Horses are resident on agricultural and rural properties in Canada, and serve many purposes – not unlike the multi-use livestock status of dairy cattle, or sheep and goats, for example. The status of horses as livestock is a position taken by the Canadian Veterinary Medical Association, the Canadian Federation of Agriculture, Equine Canada and a number of its respective member associations. It is Equine Canada's position that priority should be given to identifying and clarifying the status of horses as livestock at all levels of government regulations and policy in Canada, specifically as it relates to export, meat processing, taxation and industry development initiatives.

- Bill C-571 (if enacted) would place an onerous burden on the Canadian horse industry related to the movement of horses between provinces in Canada, with an implied responsibility to declare “why” a horse is being moved within Canada. There is no national mechanism in place that would enable Canadian horse owners to qualify (or report) why they are moving horses between provinces in Canada to ensure that they are not moving horses for slaughter. This requirement does not exist for moving other livestock in Canada.
- The enactment of Bill C-571 would immediately end the processing of horses in Canada and the inter-provincial distribution of horse meat within Canada. The suggested exception to the prohibition that is included in Bill C-571 cannot be exercised today by any sector of the Canadian or international horse industry. The suggested exception requires an expressed intent that an individual horse *was raised primarily for human consumption*, and a lifetime medical record (in chronological order) for each horse. Such lifetime records do not exist for horses today. The enactment of Bill C-571 would establish a new defacto trade standard (for both inter-provincial and international trade) that is outside the scope of Canada’s current policy and trade agreements for meat imports and exports and inter-provincial trade in food products.
- The U.S. experience with the closure of all horse processing facilities has resulted in increased horse welfare issues. US GAO (Government Accountability Office) commissioned a report to Congress entitled “HORSE WELFARE Action Needed to Address Unintended Consequences from Cessation of Domestic Slaughter”, a copy of which is attached. The GAO report identified the following consequences to the closure of U.S. processing facilities:
 - Horse welfare in the United States has generally declined since 2007, as evidenced by a reported increase in horse abandonment and an increase in investigations for horse abuse and neglect. State officials attributed the decline in horse welfare to many factors, but primarily to the cessation of domestic slaughter and the U.S. economic downturn.
 - Abandoned, abused, and neglected horses present challenges for state and local governments, tribes, and animal welfare organizations that are facing growing pressures to care for abandoned and neglected horses. According to the State Veterinarians, horse rescue operations are at, or near, maximum capacity since the cessation of domestic slaughter, with some taking on more horses than they can properly care for.
 - Horse industry representatives stated that the closing of domestic slaughtering facilities has dramatically affected the prices of horses. Analysis indicates that the cessation of domestic horse slaughter led to an 8- to 21-percent decline in the per head price of horses sold at auction. Fewer horse sales have occurred and fewer auctions have operated since 2007, and there has been reduction in the number of commercial shippers doing business since the cessation of slaughter.

Equine Canada’s position on the processing of horses focuses on ensuring that horses in Canada are provided with humane care throughout the lifecycle of every horse. [Equine Canada’s Position Statement on Processing](#) is

available through this link. Equine Canada is committed to the adoption and implementation of the [Equine Lifecycle Management Policy](#) as a program to assist our industry in maximizing the horse's quality of life and death in Canada.

Equine Canada supports the Government of Canada in its efforts to fulfil its responsibilities for ensuring a safe food supply for all Canadians, and we believe that the *Safe Food for Canadians Act* – as currently enacted – provides a solid legislative framework on which to base Canada's food safety framework.

Equine Canada is committed to continuing to work with the Government of Canada to develop the CanEQUID program as a national framework for traceability for horses in Canada. The CanEQUID program has been designed to serve our industry's needs for bio-security, herd health management, and to provide infrastructure for lifecycle record-keeping for horses in Canada.

Equine Canada would encourage the Government of Canada (and the CFIA) to devote adequate funding and to develop any required infrastructure needed to implement the *Safe Food for Canadians Act* as currently enacted in a manner that continues to ensure a safe food production and distribution network for Canadians.