

Equine Slaughter House Feasibility

Unintended Consequences for US

Patience O'Dowd President, Mary McNichols Ph.D

2/4/2013

Given that there are two states Oklahoma and New Mexico considering Horse Slaughter for Human Consumption;

We ask that you consider the substantial research/documentation which indicates that horse slaughterhouses result in deleterious consequences for communities in which they are located.

As such, we respectfully request that you reconsider the following facts and research.

- **Unstable market for American horse meat (likely to end on 7/31/13)**
- **Increased Violent Crime Rates in communities in which horse slaughterhouses are located**
- **Decreased Property Values in communities in which horse slaughterhouses are located**
- **Boycotts of Tourist and other Industries, given that 80% of Americans oppose horse slaughter**
- **Negative Impact on Economic Development**
- **Backfire on Slaughter Industry as a Whole**
- **Drug Contamination Issues (American horse meat is adulterated with many toxins, including the carcinogen, Phenylbutazone (Bute)**
- **Recall Liability Issues**
- **Worker Injuries/Death/Turnover**
- **Negative Impact on Environment**
- **The inherently inhumane process of horse slaughter**
- **US Horse Slaughter Plants do not end horse exports for slaughter**

Please see the research/documentation below which clearly demonstrates why the any state would not want a horse slaughterhouse.

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1. IS THERE A NEED TO SLAUGHTER HORSES? (NEW MEXICO, OKLAHOMA, OR THE US)

A. LETTER CALLING FOR A TASK FORCE IN NEW MEXICO (SEE APPENDIX I)

B. TRENT LOTT – “LIVE HORSES BETTER FOR THE ECONOMY”

2/14/12 statement of former Senate Majority Leader, Trent Lott, . . . “live, active horses support an important infrastructure of jobs and economies in the United States. A live horse needs to be fed, groomed and trained, as well as receive vet care, among other things. This in turn creates and maintains a viable and enduring way of life in rural America. The sale of horses to killer-buyers in fact generates very little profit for the seller while simultaneously choking off the demand for the goods and services that other buyers would create.”

Read more: <http://thehill.com/blogs/congress-blog/politics/210585-preventing-horse-slaughter-a-personal-evolution>

C. 900,000 HORSES DIE ANNUALLY AND ARE SAFELY DISPOSED OF BY MEANS OTHER THAN SLAUGHTER

Some 900,000 horses die annually and are safely disposed of by means other than slaughter, and the infrastructure can easily absorb an increase in numbers. More than one million cattle die each year with no resulting environmental hazards.

Rendering, incineration, and burial are all options, depending on local laws.

http://www.humanesociety.org/issues/horse_slaughter/facts/facts_horse_slaughter.html

D. 9 MILLION HORSES IN US ONLY 1% IN SLAUGHTER PIPELINE

“On average, less than 1% of the 9 million horses that exist in the U.S. are “surplus or unwanted”. This tiny fraction of the horse population can easily be managed and reabsorbed back into the equine community just as it has in the past. The “surplus” of horses created by the industry can simply be kept longer, sold or traded, retrained in new disciplines, donated to retirement and rescue facilities, humanely euthanized or they can provide a public service such as equine therapy.”

[http://webcache.googleusercontent.com/search?q=cache:http://www.savingamericashorses.org/WFLF's Facts that Refute the 7 Most Common Myths about Horse Slaughter.pdf](http://webcache.googleusercontent.com/search?q=cache:http://www.savingamericashorses.org/WFLF's+Facts+that+Refute+the+7+Most+Common+Myths+about+Horse+Slaughter.pdf)

E. HORSES TO SLAUGHTER NATIONALLY APPROX. 100,000YR

“Estimates show that between 2.5 and 4 million dogs and cats are euthanized at animal shelters each year (5). These could be considered the unwanted dogs and cats. By contrast, ~100,000 horses (on average) were going to slaughter when that option was allowed; this is only about 3% of the number of unwanted dogs and cats.”

<http://www.nal.usda.gov/awic/pubs/FTAAProceedings/unwantedhorseproceedings2008.pdf>

According to USDA data, those facilities, two in Texas and one in Illinois, slaughtered almost 105,000 horses in 2006—the last full year of operations. Pg 8 GAO Report HORSE WELFARE

F. NEW MEXICO ESTRAY NUMBERS AVERAGE 71/YR BY IPRA OF NEW MEXICO LIVESTOCK BOARD

http://www.sandovalsignpost.com/jul12/html/around_town.html

NM ESTRAYS (Abandoned/Lost Domestic Horses)*

Year	2006	2007	2008	2009	2010	2011
No.	59	40	114	99	58	55

Estrays						
Average	71					

* From the New Mexico Livestock Board Estray Data Base by WHOA IPRA

G. NEW MEXICO HORSES ON FEDERAL (BLM AND FOREST SERVICE) AND NM STATE LANDS

http://www.sandovalsignpost.com/jul12/html/around_town.html

(Cattle numbers in table below do not take into account cow/calf and so may be double. These numbers were very conservatively calculated see below.)

Horses and Cattle on NM Public Lands

NM Land Type	Target No. Horses	Acres	No. Cattle	Acres
NM State* Lands	0	0	171,011	8,700,000
NM BLM** Lands Socorro	70	16,493	185,023	12,800,000
NM FS Lands Jarita Mesa*** Jicarilla****	20-70 50-105	55,000 76,000	70,618	9,100,000
	Total Horses	Less than 500	Total Cattle	426,652

*Calculated from NM State Lands grazing revenue of \$5.910,144 Million divided by \$2.88/per month per cow using 12 months. Revenue and grazing fee from Karin Stangl Assistant Commissioner of Communications New Mexico State Lands Office. Note; 84% is utilized for education. K.S. Most grazing is for cultural purposes. Ray Powell.

**http://www.blm.gov/public_land_statistics/pls10/pls10_combined.pdf Divided Total AUM's by conservative 10 months grazing.

*** <http://www.fs.fed.us/rangelands/ecology/wildhorseburro/territories/Jarita.shtml>

****<http://www.fs.fed.us/rangelands/ecology/wildhorseburro/territories/Jicarilla.shtml>

H. 60-90,000 FREE ROAMING HORSES IN NM? NEW MEXICANS MISLEAD BY TASK FORCE - NMDA

Jeff Witte Secretary Department of Agriculture then heads up this Task Force with no public advertisements. Mr Witte also takes a press interview and repeats the unchecked and invalid information from the special interest group. **This information is not an estimate. It is a quotation from a special interest group. This is misleading the public.**

WHOA - IPRA Case No. 1112-47 Nov 28, 2012

No. 21 **All Documents showing any counts, census, inventory, numbers of horses that are free roaming, unwanted, or in any way show the need for this Task Force.**

No such documents exist.

REQUEST TO START UP THE TASK FORCE- EXCERPT See Appendix for entire letter.

Fwd: Equine Welfare: What IS Humane?

Parra, Anthony

Sent: Thu 4/19/2012 5:14 PM

To: Goetz, Katie

Meant to copy you too!

Begin forwarded message:

From: "Parra, Anthony" <AParra@nmda.nmsu.edu>

Date: April 19, 2012 5:01:01 PM MDT

To: "Yvonne Alexander" <YAlexand@nmda.nmsu.edu>, "Rose Garley" <RGarley@nmda.nmsu.edu>, "Lesa Medina" <Lamedina@nmda.nmsu.edu>, "Amanda Romero" <ARomero@nmda.nmsu.edu>

Cc: "Larry Dominguez" <LDomingu@nmda.nmsu.edu>

Subject: Fwd: Equine Welfare: What IS Humane?

I want you To be aware of this in case we get a call from the governors office.

Begin forwarded message:

From: "Dominguez, Larry" <LDomingu@nmda.nmsu.edu>

Date: April 19, 2012 2:42:54 PM MDT

To: "Witte, Jeff M." <JWitte@nmda.nmsu.edu>, "Parra, Anthony" <AParra@nmda.nmsu.edu>

Subject: Fw: Equine Welfare: What IS Humane?

FYI, can provide more insight later.

----- Original Message -----

From: Caren Cowan [<mailto:carenroad1053@gmail.com>]

Sent: Thursday, April 19, 2012 02:22 PM

To: Myles Culbertson <myles.culbertson@state.nm.us>; Michelle Frost <nmwgi@nmagriculture.org>; Matt Rush <matt.rush@nmfarmbureau.org>; Owen, Les; Turner, Jason; Dominguez, Larry; Jose Varela Lopez <JJVLCHIMEX@aol.com>; Ty Bays <tyson_bays@fmi.com>; Mike Hobbs <mdhobbs@bacavalley.com>; John Romero <POI94005@Isletapueblo.com>; Curt Kelling <kellingranch@plateautel.net>; Brian Moore <brian@ranchmkt.com>; Bob Alexander <bob1alexander@msn.com>

Subject: Equine Welfare: What IS Humane?

This went to Governor Martinez' office earlier today.

We need to explore other ways to utilize it. I have a call in to Matt Rush since NMFLB is on it as well.

Stay tuned!

"The New Mexico Cattle Growers' Association (NMCGA) and the New Mexico Farm & Livestock Bureau (NMFLB) respectfully request that Governor Susana Martinez convene a working group of livestock organizations, agencies and individuals to identify solutions to this extremely real and growing problem in New Mexico and across the United States."

"New Mexico, including tribal lands, is home to literally tens of thousands of feral or unwanted horses."

“Mexico will not accept intact studs (males) or pregnant mares. Feral or unwanted studs must be castrated, which if done by a veterinarian, can cost \$300 per head.”

I. NEW MEXICO UTILIZING THE MEDIA IN ORDER TO MISLEAD THE PUBLIC

Horse overpopulation runs wild in N.M. NMDA forms task force to address

overpopulation Updated: Wednesday, 22 Aug 2012, 5:48 PM MDT Published : Wednesday, 22 Aug 2012, 5:48 PM MDT

- [Deanna Saucedo](#) 

ALBUQUERQUE (KRQE) - Tens of thousands of horses are roaming the state, and there's nowhere to put them.

<http://www.krqe.com/dpp/news/environment/horse-overpopulation-runs-wild-in-nm>

Jeff Witte of NMDA repeats the special interest groups',
information to the public;

"We've had estimates of **tens of thousand of horses** that have been released across the state either on Forest Service, BLM land or tribal land," state Secretary of Agriculture Jeff Witte said. "And as that number of horses gets out there, it has a tremendous impact on the natural resources."

J. OVER BREEDING BY HORSE INDUSTRY, MOST HORSES YOUNG AND HEALTHY

According to R.T. Fitch, founder of Wild Horse Freedom Federation, **horse slaughter creates the problems it claims to solve**. He states "As a convenient and lucrative means of disposal, horse slaughter has created an over-population problem of horses, **by enabling irresponsible breeding**, and encouraging a quick turn around and dumping of horses. Very much like the housing market and the banking industry, the horse breeding industry is self destructing by saturating the market and horse slaughter is the bail out."

There are 150,000 Quarter Horse foals registered every year (at \$100.00 per foal), and over 4,000,000 registered Quarter Horses worldwide:

<http://www.horse-genetics.com/American-Quarter-Horse.html>

70% of horses slaughtered are Quarter Horses: The remainder are mostly Thoroughbreds.

<http://www.horsefund.org/resources/Horse%20Slaughter%20Fact%20Sheet%20iFH.pdf>

70% of thoroughbreds foaled go to slaughter: Data from US Government and the Jockey Club

<http://www.animallawcoalition.com/horse-slaughter/article/1953>

K. US SLAUGHTER PLANTS DO NOT END EXPORT OF US HORSES FOR SLAUGHTER

<http://www.fas.usda.gov/gats/Default.aspx>

US horses have been exported for slaughter when the US has had it's own slaughter plants. The only way to end horse exports is to pass legislation to end export.

YEAR	1967	1990	2004	2012
Canada	1315	27,856	24,428	40,865
Mexico	178	2,949	17,636	69,298

2. UNINTENDED CONSEQUENCES OF CHOOSING HORSE SLAUGHTER

A. CRIME RATES INCREASE WHEN SLAUGHTER HOUSE ARRIVE.

Brooks, Alberta Canada experienced **70% increase** in crime:

http://www.horsefund.org/resources/When_Horse_Slaughter_Comes_To_Town_28March12.pdf

Re: potential crime:

“Temple Grandin has argued that **ordinary people can become sadistic from the dehumanizing work of constant slaughter**. This is a persistent problem, she reports, that management must guard against.” (p. 231)

Jonathan Safran Foer, *Eating Animals*, New York: Little, Brown and Company (2009).

B. CRIME RATES DECREASE WHEN SLAUGHTER HOUSE LEAVES.

THE IMPACT OF HORSE SLAUGHTER PLANTS ON COMMUNITIES BY EQUINE WELFARE ALLIANCE

<http://equinewelfarealliance.org/uploads/TheImpactofSlaughterPlants.pptx>

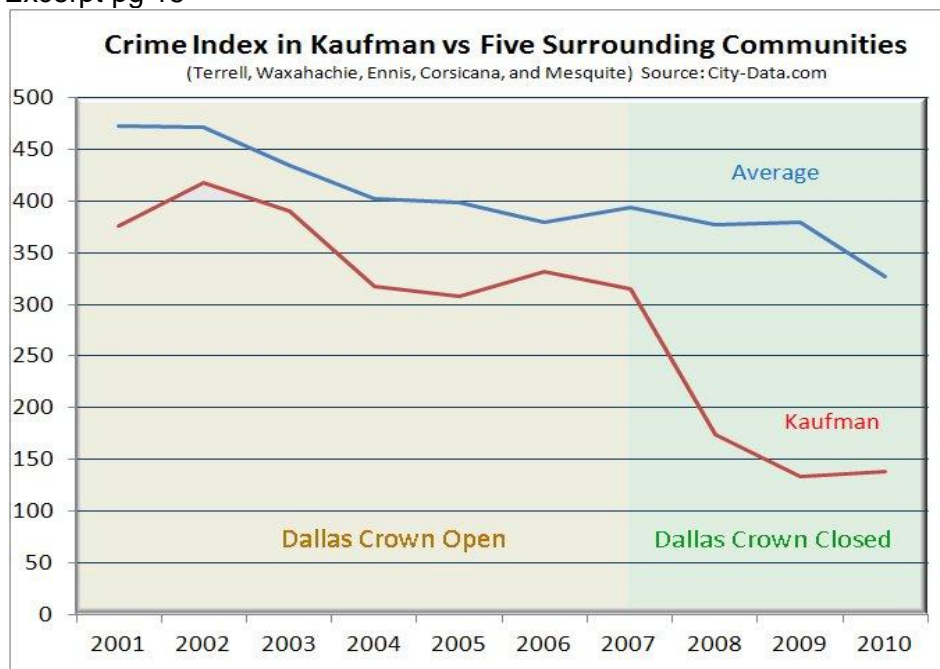
Excerpt pg 12

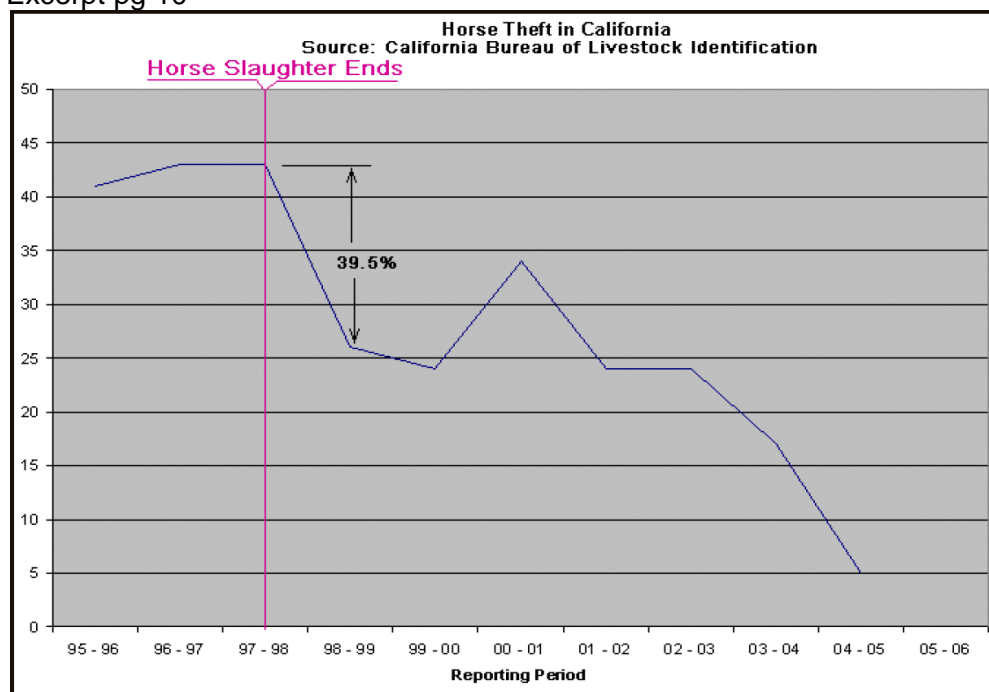
Crime

- There is an irrefutable increase in crime in communities with all slaughterhouses. This appears to be even worse for horse slaughter.
- Violent crimes, including sexual assaults and crimes against the family are the most effected.
- The definitive study of this phenomenon was done by Fitzgerald and Kalof.

Crime in Kaufman, TX After Dallas Crown Closed

- Murders dropped 100% (.5/100,000 to 0)
- Rapes dropped 100% (6.0/100,000 to 0)
- Robberies dropped 65.6%
- Assaults dropped 61.2%
- Thefts dropped 71.2%
- Auto Thefts dropped 83.3%
- Only Arsons remained unchanged.





C. CITY CRIME STATISTICS KAUFMAN TEXAS - RAW DATA BEFORE AND AFTER SLAUGHTER PLANT IN 2006

<http://www.icide.com/citydata/tx/kaufman.htm>

D. TRANSPORT CRIMES ANIMALS ANGELS REPORT:

Hauling regulations including: driving logs, driving breaks for driver, driving over 27hrs without stopping, no food, shelter, or water abuses. Pathogen laws disregarded regarding composting and transmission of virus.

Crimes of abuse. **Commercial Transportation Issues include;**

<http://www.animallawcoalition.com/horse-slaughter/article/1472>

See Exhibit 4 bottom web page, Animals Angels.

E. WHEN CALIFORNIA BANNED HORSE SLAUGHTER IN 1998, THE HORSE THEFT RATE DROPPED 34 PERCENT.

http://www.humanesociety.org/issues/horse_slaughter/facts/facts_horse_slaughter.html

SLAUGHTER HORSE TRANSPORT PROGRAM

Our review of the slaughter horse transport program found that APHIS needs to improve its controls for ensuring that horses being shipped to foreign plants for slaughter are treated humanely. At present, APHIS does not deny authorization to individuals with a record of inhumanely transporting slaughter horses to ship other loads of horses, even if unpaid fines are pending for previous violations. Regulations simply do not address denying this authority, and so APHIS provides the authorization, regardless of the owner's history. Without regulations or legislation to establish more meaningful penalties, owners have little incentive to comply with regulations, pay their penalties, and cease inhumanely handling horses bound for slaughter. Finally, we found that there were control deficiencies in how APHIS tags horses that have been

inspected and approved for shipment to foreign slaughterhouses. The agency requires shippers to mark such horses with backtags, which are intended to allow APHIS employees to trace

We compared the costs of using veterinarians and DQPs for inspections. The details of this analysis are found on page 17. horses back to their owner and also to verify that the horses have passed inspection by an accredited veterinarian. We found, however, that the agency's controls over these tags were weak, and that owners could easily obtain them and apply the tags to horses without APHIS' knowledge. In addition, APHIS does not currently have an effective control or tracking system to trace all backtags used to transport horses to slaughter. Without regulations controlling the distribution, use, and tracking of these tags, owners can transport horses that do not meet the requirements for shipment. APHIS needs to seek the appropriate legislative and regulatory changes to ensure that only qualified individuals (such as APHIS personnel or USDA-accredited veterinarians) apply backtags to horses being shipped to slaughter. It also needs to obtain the resources necessary to adequately oversee the Slaughter Horse Transport Program. We concluded that APHIS needs to take the following steps to strengthen controls over the Horse Protection Program and the Slaughter Horse Transport Program. . .

<http://www.usda.gov/oig/webdocs/33601-02-KC.pdf>

F. PROPERTY VALUES DEGRADE

Decline of Property Values and a Decrease in the Quality of Community Health

Communities which were home to horse slaughterhouses, such as those in Texas and Illinois experienced declining property values, as well as critically negative impacts with regard to quality health factors. Paula Bacon, the former Mayor of Kaufman, Texas, which housed one of the three U.S. horse slaughter plants before the state passed legislation to close it based upon serious community safety and health hazards, has actively encouraged Congress to pass federal legislation to outlaw horse slaughter and horses for transport to slaughter. Texas and Illinois state government officials incurred substantial enforcement costs in an effort to try to regulate environmental problems with horse slaughter plants, which included stench that emanated several miles from the facilities, fluid runoff and blood in community water supplies. Paula Bacon stated, "The standard of living dropped during the time horse slaughter facilities operated." "The industry caused significant and long term hardship to my community..." "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." In the letter she wrote to her congressional constituents, she affirmed, "We who love these magnificent animals do not only protest their slaughter on "emotional grounds" as the pro-slaughter group would have you believe. I am posting a letter that I wrote to the Legislators considering this move. I know that a horse slaughtering plant is the "death knell" as far as property values in the area surrounding them go."

"Paula Denmon, a realtor who specializes in equine properties from Waxahachie, Texas, wrote a letter to Congress, titled "To All Legislators Considering the Renewal of Horse Slaughter in the United States," which detailed her professional observations concerning property values in relation to horse slaughter plants. She claimed that despite highly desirable and affordable properties, which had multiple desirable amenities typically sought after by horse people compared to other areas, buyers adamantly refused those within Kaufman counties because of the horse slaughter plant. She asserted "This was my introduction to the horrible reputation of the Dallas Crown Horse Slaughter Plant. My clients did not want to buy property in the

county. They were worried that they would come home from work to find their horses gone, stolen, and already slaughtered at the nearby plant. And some just loved horses, and did not want anything to do with an area close to where people killed them to be food. “Americans don’t eat horsemeat, why are they here” they would ask?”

Following the closing of the Dallas Crown horse slaughter plant, Paula Denmon witnessed the City of Kaufman, as well as small communities in outer lying areas flourish, as a result. Not only were families moving back into these areas, but there was also a corresponding increase in new businesses becoming established, thus improving the overall economy. She contended, “... the property values of the acreage properties [have] gone up dramatically...” I would caution that the reintroduction of horse slaughter plants would have significant detrimental effects on the communities that exist close to it. They will put real estate values in the “toilet”. The jobs are low-paying and seem to attract people who do not fit into the life of the community.”

<http://americansagainsthorseslaughter.com/uploads/AAHS-Horse-Slaughter-Truth-Deception.pdf>

G. ENVIRONMENT, ODOR CONTROL, SEWER, ENTRAILS

THE IMPACT OF HORSE SLAUGHTER PLANTS ON COMMUNITIES BY EQUINE WELFARE ALLIANCE
<http://equinewelfarealliance.org/uploads/TheImpactofSlaughterPlants.pptx>

Odor Control

Excerpt pg 9

Odors, Sounds and Property Values

- The odors from the carnage, and from the chlorine misters meant to cover it up, were overpowering and blew over much of the town.
- The hospital, blocks away, was forced to install special air filters to protect its patients.
- Residents complained of hearing the horses “screaming”.
- A pump installed by Dallas Crown to force their waste down the sewer actually caused blood to rise up into the bathtubs of the neighborhood.
- Property values in the neighborhood behind the plant dropped to near zero. Since the plant closed they have increased dramatically.



Records show Cavel was in violation in every measure of its discharge

9/29/06	8:30	300	50	36.9	9.3	9/27/06	8:15	390	200	50.5	7.05
Mo. Ave.		1206	260	36.9		Mo. Ave.		502.5	255	36.8	
4/5/06	8:40	1050	50	23.7	9.13	10/4/06	8:15	90	210	66	7.27
4/12/06	8:50	570	160	36.4	11.78	10/11/06	8:20	2220	440	78.4	9.42
4/19/06	8:45	120	88	29.9	7.31	10/18/06	8:40	1290	320	86.8	7.16
4/26/06	8:00	810	130	86	8.53	10/25/06	8:20	270	110	30	7.71
Mo. Ave.		637.5	107	44		Mo. Ave.		967.5	270	65.3	
5/3/06	8:20	1110	150	28	9.4	11/1/06	8:30	1080	280	106	5.58
5/10/06	8:20	1320	130	74.3	9.5	11/8/06	8:50	900	284	58.7	7.15
5/17/06	8:45	903	330	19.6	5.65	11/15/06	8:10	1680	210	27.6	7.57
5/24/06	8:40	390	140	28.3	9.9	11/22/06	8:10	390	340	20	7.35
5/31/06	8:45	0	150	30.9	7.62	11/29/06	8:45	1230	250	14.8	7.63
Mo. Ave.		744.6	180	36.2		Mo. Ave.		1056	272.8	45.42	
6/7/06	8:15	1920	730	98.4	6.1	12/5/06	8:15	210	156	16.9	5.5
6/14/06	8:25	1290	108	40.1	7.4	12/13/06	8:30	1200	110	34.8	7.29
6/21/06	8:20	1080	110	63.2	7.53	12/20/06	9:50	1200	90	32.2	7.26
6/28/06	8:30	2340	250	16.1	7.97	12/27/06	8:10	600	180	31	6.96
Mo. Ave.		1658	299.5	54.5		Mo. Ave.		802.5	134	28.78	

H. LIABILITY OUT WEIGHTS PROFITS

Excerpt Page 7



I. LIABILITY/SLAUGHTER HOUSE INJURIES AROUND

Jonathan Safran Foer, *Eating Animals*, New York: Little, Brown and Company (2009).

Turnover rates:

“You will continuously have to find the workers, since **annual turnover rates typically exceed 100 percent**. (The interviews I did suggest turnover rates of around 150 percent). Illegal aliens are often preferred, but poor recent immigrants who do not speak English are also desirable employees. By the standards of the international human rights community, the typical working conditions in America’s slaughterhouses constitute human rights violations...” (pp. 131-2).

Injuries:

“(Slaughterhouse workers have the highest injury rate of any job—27 percent annually—and receive low pay to kill as many as 2,050 cattle a shift.)” (p. 231)

Emotional Injury and potential crime:

“Temple Grandin has argued that ordinary people can become sadistic from the dehumanizing work of constant slaughter. This is a persistent problem, she reports, that management must guard against.” (p. 231)

J. GAO JAN 2005 -WORKPLACE SAFETY AND HEALTH SAFETY IN THE MEAT AND POULTRY INDUSTRY, WHILE IMPROVING, COULD BE FURTHER STRENGTHENED

Pg 22 Other injuries that workers can experience include respiratory irritation and, in some instances, **asphyxiation from exposure to pathogenic respiratory substances**. For example, workers have **died from being overcome by hydrogen sulfide gas** and from drowning when they entered manure waste pits or unknowingly worked near manure waste “lagoons” without taking the proper precautions, such as conducting an air test and wearing a safety harness and respirator; such precautions are particularly critical when workers are in confined spaces.

According to OSHA, **one worker died from chemical exposure after being sprayed with 400 pounds of toxic liquid ammonia while attempting to fix a pipe**. Workers may also suffer injuries and illnesses from contact with animals. If the animals **are still dying when they are hung on the line, they may struggle and thrash about wildly, resulting in injuries that range from broken arms to permanent disfigurement and—in the most severe cases—death**.

Contact with different bacteria can cause fever, headaches, vomiting, diarrhea, and kidney damage. In addition, illnesses that can be contracted from diseased animals continue to raise concerns. According to USDA officials, the transmission of disease from animals to humans in the meat and poultry industry is uncommon because of concerted efforts in the United States and abroad. However, recent **outbreaks of bovine spongiform encephalopathy among cattle (commonly known as “mad cow disease”)** are related to incidences of a disease that affects humans, according to the Centers for Disease Control and Prevention. While beef consumption is recognized as a mode of infection, **it is unknown whether this disease can be transmitted in other ways, such as exposure to waste or blood**.

Workers can also suffer **back injuries or other types of injuries from over exertion, including sprains, strains, tears, hernias, and fatigue**. They can suffer injuries, and even death, from falling or being struck by an object. For

example, workers have been killed by falling ice and forklift parts, and falls due in part to a lack of functioning safety devices. In one incident, an employee was killed when a rack of sausage fell from a manual overhead conveyor system and struck him. Workers can be burned by heat sealant machines when they wrap meat. Workers may also sever fingers or hands or even lose limbs on machines that are either improperly locked or inadequately guarded.

Pg28

A number of injuries sustained by meat and poultry workers are fatal; according to BLS fatality data, from 1992 to 2002, 229 workers died from their injuries. Of the 229 worker deaths, almost one-quarter occurred off plant property, rather than during production, in transportation accidents. The deaths that occurred in plants over this period included 60 that were caused by contact with objects and equipment (37 of these by being caught in or compressed by equipment or objects, including running machinery); 25 by falling; 35 from exposure to harmful substances; 4 from fires and explosions; and 22 from assaults and violent acts, including homicides.

Pg 26

<http://www.gao.gov/new.items/d0596.pdf>

"One of the crucial determinants of a slaughterhouse's profitability is also responsible for many of its greatest dangers: the speed of the production line. Once a plant is fully staffed and running, the more head of cattle slaughtered per hour, the less it costs to process each one. If the production line stops, for any reason, costs go up. Faster means cheaper—and more profitable. The typical line speed in an American slaughterhouse 25 years ago was about 175 cattle per hour. Some line speeds now approach 400 cattle per hour."

"Faster also means more dangerous. When hundreds of workers stand closely together, down a single line, wielding sharp knives, terrible things can happen when people feel rushed. The most common slaughterhouse injury is a laceration. Workers stab themselves or stab someone nearby."

"Employee Decapitated by Chain of Hide Puller Machine. Employee Killed When Head Crushed by Conveyor. Employee Killed When Head Crushed in Hide Fleshing Machine. Employee Killed by Stun Gun. Caught and Killed by Gut-Cooker Machine."

"The most dangerous plants are the ones where cattle are slaughtered."

"Cattle, however, vary enormously in size, shape, and weight when they arrive at a slaughterhouse. As a result, most of the work at a modern beef plant is still performed by hand." In the age of the space station and the microchip, the most important slaughterhouse tool is a well-sharpened knife."

<http://www.motherjones.com/politics/2001/07/dangerous-meatpacking-jobs-eric-schlosser>

"The work takes a major emotional toll on the workers. Here's one worker's account:
"I've taken out my job pressure and frustration on the animals, on my wife, ... and on myself, with heavy drinking." Then it gets a lot worse: "... with an animal who pisses you off, you don't just kill it. You ... blow the windpipe, make it drown in its own blood, split its nose... I would cut its eye out... and this hog would just scream. One time I ... sliced off the end of a hog's nose. The hog went crazy, so I took a handful of salt brine and ground it into his nose. Now that hog really went nuts..."

<http://www.meat.org.uk/slaught.html>

Government reports (GAO, etc.), re: injuries—physical and psychological-- to workers in slaughterhouses, as well as documenting the deleterious effects of slaughterhouses on communities
<http://www.whatcomcounty.us/pds/pc/pdf/20120718-harris.pdf>

This link describes litigation due to worker's slaughterhouse injury. As an elected official, I am certain that you would rather your state not have to defend against such litigation:

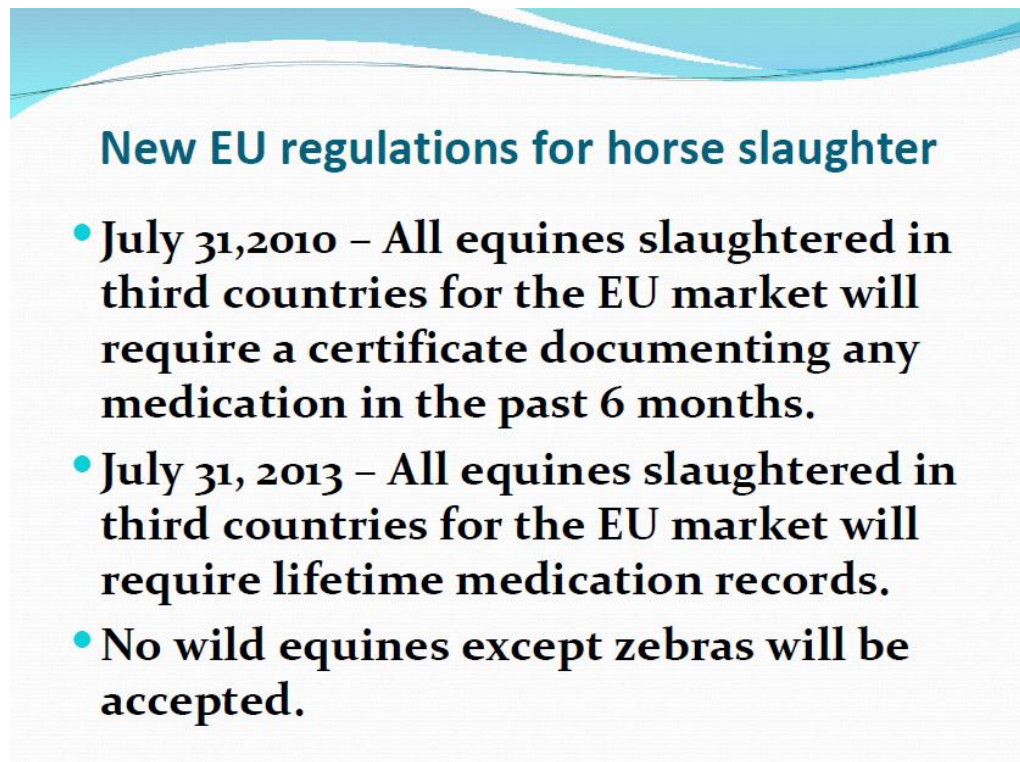
<http://www.businessinsurance.com/article/20100308/NEWS/100309914>

3. UNSTABLE MARKET – RECALL - LIABILITIES - DRUG TAINTED MEAT – TRACKING SYSTEM REQUIRED

A. DRUG RESIDUES IN US HORSE MEAT EQUINE WELFARE ALLIANCE

<http://www.americanhorsemeat.com/uploads/Ppt0000002.pdf>

Excerpt Page 14



New EU regulations for horse slaughter

- July 31, 2010 – All equines slaughtered in third countries for the EU market will require a certificate documenting any medication in the past 6 months.
- July 31, 2013 – All equines slaughtered in third countries for the EU market will require lifetime medication records.
- No wild equines except zebras will be accepted.

Adverse Effects

Phenylbutazone

- Carcinogen
- Agranulocytosis – Loss of infection-fighting white blood cells
- Aplastic Anemia – Bone marrow suppression 94% mortality
- Liver failure

Metabolite Oxyphenbutazone

- Agranulocytosis – Loss of infection-fighting white blood cells
- Aplastic Anemia – Bone marrow suppression 71% mortality
- Thrombocytopenia – Loss of platelets (increased bleeding)
- Leucopenia – Abnormal decrease in white blood cells
- Pancytopenia – Abnormal decrease of all blood cells & platelets

**Presented by John Holland, Pres. EWA
to the Finance, Ways and Means Committee**

B. CANADA-STOPPS-ACCEPTING-US-HORSES-SLAUGHTER PASSPORTS TO BE REQUIRED:

“Effective July 31, 2013, the European Union – a major market for meat from U.S. horses slaughtered in Canada and Mexico – will require lifetime medication records for slaughter-bound horses. Both Canada and Mexico have attempted in recent years to tighten their requirements for veterinary records, responding to EU concerns over medications, such as Bute, that it bans from the food chain. But equine welfare advocates have long contended that the affidavits or Equine Identification Documents that are supposed to accompany slaughter-bound U.S. horses, and which detail their veterinary histories, are easily and frequently forged or fabricated as horses pass through the pipeline to Canadian and Mexican slaughterhouses. The recent FVO audit of Mexican slaughterhouses, which said 80 percent of horses killed in Mexico’s slaughterhouses originated in the U.S., did not use such stark terms but raised serious questions about the affidavits.”

As happened recently, a finding of unacceptable drug residues in meat from the US will jeopardize the US for liabilities as well as have the Market Closed to US horse meat.

“The United States market for slaughter horses was thrown into confusion Friday after slaughterhouses in Canada appeared to have closed their doors abruptly to U.S. horses, according to slaughter buyers, lower-market horse dealers, and the auctions they frequent.”

<http://www.drf.com/news/canada-stops-accepting-us-horses-slaughter> 10/13/2012

C. CONTAMINATED HORSE MEAT

Pg I EUROPEAN COMMISSION HEALTH AND CONSUMERS DIRECTORATE-GENERAL

Directorate F - Food and Veterinary Office DG (SANCO) 2010-8524 - MR FINAL FINAL REPORT OF A MISSION CARRIED OUT IN MEXICO FROM 22 NOVEMBER TO 03 DECEMBER 2010

Executive Summary

...*"The sworn statement on veterinary medical treatments, is requested for all slaughter horses, irrespective of their origin; however, there are no official controls in place to verify their authenticity or reliability. According to the Mexican National Residues Monitoring Programme (NRMP), 19 samples in 2008, nine in 2009 and six in 2010 have tested positive for residues of substances, the use of which is prohibited in the EU. All of those horses were covered by the declaration stating that no treatments were administered to the animals. Following two Rapid Alert System for Food and Feed (RASFF) notifications in September 2010, the Mexican Competent Authorities (CAs) reacted and **identified five potential US providers, who will be targeted in the next sampling in the framework of the NRMP.**"*

<http://equinewelfarealliance.org/uploads/TheImpactofSlaughterPlants.pptx>

Excerpt pg 3



Food Production Daily:

<http://www.foodproductiondaily.com/Quality-Safety/Tainted-US-horse-meat-puts-world-consumers-at-risk-welfare-body>

Irish article indicating that if a child ingests even the smallest amount of bute in an animal product (i.e, horsemeat), that child can develop aplastic anemia and that, therefore, the EU has banned it entirely. See the first paragraph:

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

FDA: "For animals, phenylbutazone is currently approved only for oral and injectable use in dogs and horses. Use in horses is limited to use in **horses not intended for food**. There are **currently no approved uses of phenylbutazone in food-producing animals.**"

<http://www.fda.gov/AnimalVeterinary/NewsEvents/CVMUpdates/ucm124078.htm>

“Focusing on one such banned substance, phenylbutazone, the paper outlines the extreme dangers to children and warns veterinarians, “It is a statement of fact that if the European Commission on its audit of this country find evidence of bute use in animals not excluded from the food chain, then the product will immediately lose its license Europe-wide. If samples prove positive for phenylbutazone or its metabolite in equine meat of Irish origin, it will be traced back, and the prescribing veterinary practitioner will be in the firing line of prosecution.”

The paper states “The difficulty with phenylbutazone is that it, or its metabolite, can cause aplastic anemia in children.

If a child were to consume an animal-based product containing even the minutest amount of bute or its metabolite then the child may develop aplastic anemia.”

<http://horsebackmagazine.com/hb/archives/11521>

Dr. Marini, et al, re: the “public health risks” of horses administered bute and slaughtered:
http://www.equinewelfarealliance.org/uploads/Food_and_Chemical_Toxicology_FINAL.pdf

Dr. Marini, to legislators why horsemeat is deadly, containing this statement, “Moreover, there are other drugs that are banned in horses sent to slaughter for human consumption including the dewormer Ivermectin, acepromazine and clenbuterol. In the absence of a mechanism to remove horses given bute from the slaughter pipeline, which would likely be close to 100% of them, our results indicate that Missouri will be sending contaminated horsemeat for human consumption. To avoid this problem, **the state will have to implement** a program through the **Department of Agriculture to require health certificates for horses that owners want to send to slaughter for human consumption.** This would be similar to the horse passport system in the United Kingdom (UK). **This would be a huge undertaking for the state and taxes may have to be raised** to accomodate the small percentage of horse owners who wish to send their horses to slaughter for human consumption. I should also add that bute is banned in horses sent to slaughter for human consumption in Canada, the UK and the European Union (EU). In fact, the EU has come out with new requirements for third countries like the US that supply horsemeat to EU markets. You should also know that horses have 1.76 times the blood that a cow which by definition will increase the number of and the amount of bute residue in contaminated horse carcasses (see our paper).”

<http://goldendays-suzanne.blogspot.com/p/horsemeat-is-deadly-to-humans-ann-m.html>

Dr. Marini’s letter rebutting the claims of “equine experts”;

<http://horsebackmagazine.com/hb/archives/14032>

Dr. Marini, examines back grounds of “equine experts”

<http://horsebackmagazine.com/hb/archives/11862>

Curriculum vita of Dr. Marini

<http://www.equinewelfarealliance.org/uploads/Marini-CV.pdf>

Article by Vickery Eckhoff, re: Dr. Marini’s article and her rebuttal of the claims that horsemeat is safe:

<http://www.forbes.com/sites/vickeryeckhoff/2012/06/18/how-safe-is-that-horse-meat/3/>

[European Commission document titled *Imports of Animals and Food of Animal Origins From Non-EU Countries*.](#)

“The EU is putting teeth into strict enforcement of regulations that began in 2010 when the European nations warned horses coming to those countries from abroad must be in full compliance within three years. That time span has nearly lapsed.”

“Substances without an EU MRL forequidae wich are not nor deemed essential medicines

Some medicines commonly used for horses world-wide e.g. phenylbutazone, are not listed in [Reg. 1950/2006](#) or in Table 1 of the Annex to Regulation 37/2010. Any horse in the EU treated with phenylbutazone must be excluded from the food chain and signed out of the food chain in the passport.”

The strict new passport regulations are contained in a [European Commission document titled *Imports of Animals and Food of Animal Origins From Non-EU Countries*.](#)

New EU Regs Spell Likely End to Euro Markets for American Horse Meat

July 31, 2012 By Steven Long

The market for horse meat in the EU will end on July 31 2013.

"You do not dispose of any animal into a human being's food chain. It is not a disposal service." From comments.

<http://horsebackmagazine.com/hb/archives/17163>

Animals used for food are specifically raised, regulated, and inspected, as food animals. Forces within the US want to dispose of contaminated meat into other's food supplies. In so doing, we have simply followed the market unethically. We have lost the opportunity and ability to lead. WHOA New Mexico

D. RUSSIAN MARKET

“Russia has widened its ban on the import of US meat amid concern over the use of growth stimulator Ractopamin to include Canada.

Russia's Federal Agency for Agricultural Control, the Rosselkhoznadzor, said it will prevent the import of any meat produced from animals fed using the beta-blocker in those two countries, which is used to also reduce the content of fat in beef and pork.

This drug is banned for use in 160 countries, including Russia and China, but is allowed in 24 countries, including Canada and the US.”

http://www.just-food.com/news/russia-widens-ban-on-canadian-us-meat-imports_id121816.aspx
18 January 2013

http://rbth.ru/news/2013/01/22/russia_may_limit_meat_imports_from_us_canada_over_leanness_drug_-_russia_22104.html January 22, 2013

http://www.upi.com/Business_News/2013/01/25/Russia-to-ban-beef-pork-from-US-Canada/UPI-41371359124110 Jan. 25, 2013

E. HORSE IS NON-FOOD-ANIMAL

Food Animal

An animal raised for its meat(e.g., cattle, pork, sheep) and often consumed after heating by boiling, frying, broiling, etc.
<http://medical-dictionary.thefreedictionary.com/Food+Animal>

F. TOURISM IMPACT – NATIONAL PUBLIC OPINION ABOUT NEW MEXICO

Eco Tourism in New Mexico, the “Land of Enchantment” accounts for it’s second largest revenue stream and is the largest private sector employer. (Southwest Planning and Marketing 8/2005.)

A horse slaughter facility may affect New Mexico’s eco-tourism negatively as the poll below shows public opinion, across the board in America, are strongly opposed.

G. THE RECENT NATIONAL SURVEY BY LAKE RESEARCH SHOWS:

<http://www.apnm.org/mailbox/horseslaughter/Poll%20Memo%20-%20ASPCA%20Horse%20Slaughter%20Research.pdf>

“Four in five (80%) voters disapprove of allowing American horses to be slaughtered for human consumption. In fact, two-thirds (67%) of all registered voters disapprove strongly , while just 13% say they approve of slaughtering American horses for human consumption.

Furthermore the opposition to horse slaughter for human consumption has grown by over 10 percentage points over the past five years.”

H. DISEASE INCOMING FROM ALL STATES

THERE ARE 9 MILLION HORSES¹ IN THE US. 900,000² OF THEM DIE EACH YEAR AND ARE PROPERLY DISPOSED OF. ANOTHER 110,000³ ARE SENT TO SLAUGHTER BUT COULD HAVE BEEN HANDLED THE SAME WAY AS THE 900,000 OR BEEN RETAINED.

OF THE HORSES THAT GO FOR SLAUGHTER IN MEXICO, 8.5%⁴ ARE REJECTED AT THE BORDER FOR DISEASE, NOT GELDED, ECT. THE REJECTED HORSES ARE NOT TRACKED BY APHIS AND ARE DUMPED IN NEW MEXICO⁵.

¹http://webcache.googleusercontent.com/search?q=cache:http://www.savingamericashorses.org/WFLF's_Facts_that_Refute_the_7_Most_Comm on_Myths_about_Horse_Slaughter.pdf

²http://www.humanesociety.org/issues/horse_slaughter/facts/facts_horse_slaughter.html

³<http://www.fas.usda.gov/gats/default.aspx>

⁴ec.europa.eu/food/fvo/act_getPDF.cfm?PDF_ID=9501

⁵<http://archive.constantcontact.com/fs022/1101655399670/archive/1106046671023.html> pg 7

THESE HORSES WOULD NOT BE ELIGIBLE FOR SLAUGHTER FOR HUMAN CONSUMPTION IF PICKED UP AGAIN AS THEY WOULD BE DISEASED, HAVE NO PAPER WORK, ETC.

A SLAUGHTER HOUSE IS THEREFORE THE ROOT CAUSE OF THE “UNWANTED HORSE” DUMPING ISSUE, NOT THE SOLUTION AS IS PURPORTED BY SLAUGHTER ADVOCATES.

I. UK HORSE MEAT SCANDAL:

Major Supermarket Chain Clears Shelves of “100%” Beef Patties When New Study Shows Burgers Contain “80%” Tainted Horse Meat

Posted: February 6, 2013 by R.T. Fitch in [Horse News](#), [Horse Slaughter](#)

<http://rtfitchauthor.com/2013/02/06/uk-horse-meat-scandal-major-supermarket-chain-clears-shelves-of-100-beef-patties-when-new-study-shows-burgers-contain-80-tainted-horse-meat/>

THE UNWANTED HORSE ISSUE WILL EFFECTIVELY END WHEN SLAUGHTER OF EQUINES FOR HUMAN CONSUMPTION ENDS.

J. LIVESTOCK INSPECTION COST – MUST BE FACTORED INTO ANY FEASIBILITY STUDY.

<http://www.usda.gov/oig/webdocs/33601-02-KC.pdf>

K. OUTSTANDING LEGAL AND ENVIRONMENTAL ISSUES INCLUDE

APPLYING FOR A GRANT OF INSPECTION

In order to obtain a Grant of Inspection from USDA-FSIS, for a meat or poultry establishment you need at a minimum the following . . .

1. A HACCP Plan. HACCP is an acronym for hazard analysis critical control point. Such a food safety “process control program” must be developed by someone formally trained in HACCP.
2. A Sanitation Standard Operating Procedure (Sanitation SOP).
http://www.fsis.usda.gov/PDF/GOI_Ltr_OPPD.pdf

L. MEAT INSPECTION COST - NEPA REVIEW:

http://www.fsis.usda.gov/PDF/Petition_RD_SchiffHardin_020112.pdf February 1, 2012

“For the reasons outlined above, USDA must prepare an environmental review pursuant to NEPA prior to starting inspections for horse slaughter. The agency must also implement changes to its regulatory framework to address new EU standards for trade in horsemeat. Should USDA resume inspections without complying with the court's holding in *Johanns*, the HSUS will take appropriate legal action to enforce the Orders of the court.”

The Humane Society of the United States

M. FSIS ALSO DOES NOT HAVE A CURRENT WORKFORCE

<http://www.gao.gov/products/GAO-10-487T> Highlights

“FSIS also does not have a current workforce planning strategy for allocating limited staff to inspection activities, including HMSA enforcement. Last, while FSIS has strategic, operational, and performance plans for its inspection activities, they do not clearly outline goals, needed resources, time frames, or performance metrics. Nor do these plans provide a comprehensive strategy to guide HMSA enforcement. In our report, we recommend, among other things, that FSIS take actions to strengthen its oversight of humane handling and slaughter methods at federally inspected facilities. “

FSIS - Food Safety and Inspection Services

N. RELEVANT QUOTES

<http://www.okskosher.com/quotes.html>

<http://www.citizen.org/documents/LesterFriedlanderaffidavit.pdf>

4. SLAUGHTER INDUSTRY ISSUES/STATUS (GAO REPORTS)

A. ANIMAL ENTERPRISE LAW

The federal **Animal Enterprise Terrorism Act (AETA)** United States federal law (Pub.L. 109–374; 18 U.S.C. § 43) <http://law.justia.com/codes/us/2010/title18/parti/chap3/sec43/> protects Animal Enterprises from interference. New Mexico’s Livestock Board has recently adopted the language from this law into their administrative code on Nov 6th, 2012.

Notwithstanding the AETA, it is governmental reports, two of which are referenced below in 4b, 4c which show that slaughter, even of cattle, has not, and is not, meeting humane legal standards. Opening an equine slaughter house in New Mexico, or any state for that matter, will further high-light the slaughter industry’s inability to comply as a whole with the Humane Slaughter Act .

B. GAO JAN 2005 -WORKPLACE SAFETY AND HEALTH SAFETY IN THE MEAT AND POULTRY INDUSTRY, WHILE IMPROVING, COULD BE FURTHER STRENGTHENED – SHOWS NON-COMPLIANCE WITH HUMANE SLAUGHTER ACT.

Workers may also suffer injuries and illnesses from contact with animals. **If the animals are still dying when they are hung on the line, they may struggle and thrash about wildly, resulting in injuries that range from broken arms to permanent disfigurement and—in the most severe cases—death.** Read more in section on Workers Injuries.

7 U.S.C.A. § 1902 Humane Methods

No method of slaughtering or handling in connection with slaughtering shall be deemed to comply with the public policy of the United States unless it is humane. Either of the following two methods of slaughtering and handling is hereby found to be humane:

(a) in the case of cattle, calves, horses, mules, sheep, swine, and other livestock, all animals are **rendered insensible to pain by a single blow or gunshot or an electrical, chemical or other means that is rapid and effective, before being shackled, hoisted, thrown, cast, or cut; or**

(b) by slaughtering in accordance with the ritual requirements of the Jewish faith or any other religious faith that prescribes a method of slaughter whereby the animal suffers loss of consciousness by anemia

of the brain caused by the simultaneous and instantaneous severance of the carotid arteries with a sharp instrument and handling in connection with such slaughtering.

II. Captive Bolt/Exsanguination: Method of Achieving Insensibility Used in the United States

The penetrating captive bolt followed by immediate exsanguination (bleeding out) has been the preferred method of achieving insensibility of equines in American slaughterhouses since the early 1980's. The mode of action of a penetrating captive bolt gun is concussion and trauma to the brain. This requires that it be held firmly against the surface of the head over the intended site. **Because placement and positioning of the projectile is critical, some degree of restraint is required for proper use of this device.**

While the destruction of brain tissue with the penetrating captive bolt *may* be sufficient to result in death, **operators are strongly advised to ensure death by exsanguination.**

C. CAPTIVE BOLT IN NON-COMPLIANCE WITH HUMANE METHODS OF SLAUGHTER ACT

(Source: <http://lacs.vetmed.ufl.edu/HumaneEuthanasia/Ex.htm>)

It is important to note that in the foreign owned **equine slaughter houses operating in the United States, no form of restraint is used when the equine is in the kill chute or 'knock box' waiting for the penetrating captive bolt to be applied. In some instances, it takes several attempts to effectively apply the penetrating captive bolt to the equine, if this is achieved at all. The use of the penetrating captive bolt is in violation of 7 U.S.C.A. §1902 (a) of the Humane Slaughter Act as this methodology requires more than one blow and is inefficient at rendering equines immediately insensible.**

(Sources: (i) Dr. Lester Friedlander, DVM and former Chief USDA Inspector, and (ii) Humane Farming Association video documentation at <http://www.manesandtailsorganization.org/media.html>)

D. USE OF THE CAPTIVE BOLT CAUSES EXTREME PAIN.

In a study conducted at Hanover University, EEG and ECG recordings were taken on all animals to measure the condition of the brain and heart during the course of slaughter and stunning. EEG readings showed that although the animals were apparently unconscious soon after stunning with the penetrating captive bolt, they were experiencing severe pain immediately after stunning.

(Source: http://www.themodernreligion.com/misc/an/an_slaughter.htm)

E. HORSES REGAIN CONSCIOUSNESS APPROXIMATELY 30 SECONDS AFTER THE CAPTIVE BOLT IS APPLIED.

Due to the inherent differences in skull structures of bovines and equines, each species reacts to the captive bolt differently. The brain of an equine is further back in the skull compared to a bovine. The equines regain consciousness and are not insensible to pain shortly after they are shackled and hoisted. Therefore, they are very much aware of being butchered alive.

(Source: Dr. Lester Friedlander, DVM and former Chief USDA Inspector.)

. . . The AVMA position regarding the use of the penetrating captive bolt is in violation of 7U.S.C.A. § 1902 (a) of the Humane Slaughter Act as this methodology requires more than one blow and is inefficient at rendering equines insensible.

CONCLUSION

The use of the penetrating captive bolt is in violation of the Humane Slaughter Act generally, and 7 U.S.C.A. § 1902 (a) specifically. Any other method of slaughter as applied to equines is in violation of the Humane Slaughter Act of 1958 generally, and 7 U.S.C.A. §1902 (a) specifically.

F. GAO HUMANE SLAUGHTER ACT 2004 AND 2010– CATTLE CONSCIOUS SLAUGHTER

After 35 years experience slaughtering cattle a “bovine” with a short neck, under The Humane Slaughter Act, there are still egregious issues. WHOA has serious concerns regarding even the possibility of “humane slaughter” especially of equines “flight animals”. Again, see below a review of the two recent GAO Reports to Congress on the Humane Slaughter Act of 1958 in 2004 and 2010, below).

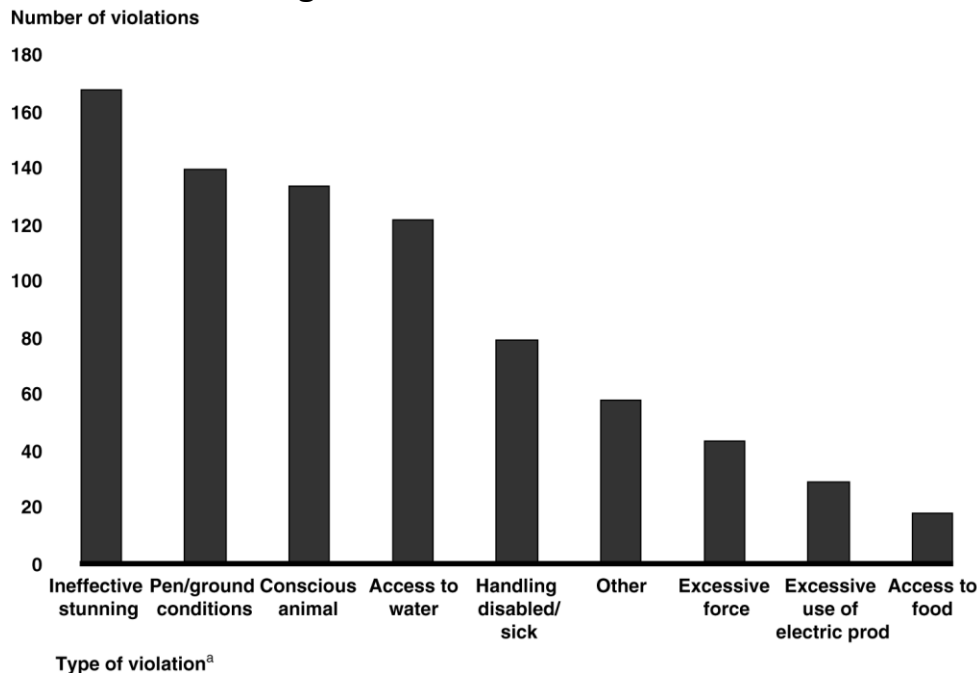
G. GAO JANUARY 2004 HUMANE METHODS OF SLAUGHTER ACT - USDA HAS ADDRESSED SOME PROBLEMS BUT STILL FACES ENFORCEMENT CHALLENGES

<http://www.gao.gov/new.items/d04247.pdf>

Excerpt pg 17: “The most prevalent noncompliance documented was the ineffective stunning of animals, in many cases resulting in a conscious animal reaching slaughter.”

Excerpt pg 21

Figure 5: Violations Documented in Noncompliance Records between January 2001 and March 2003 - Shows Ineffective Stunning and Conscious Animal (emphasis added)



Source: GAO's analysis of FSIS noncompliance records.

1 Ineffective Stunning

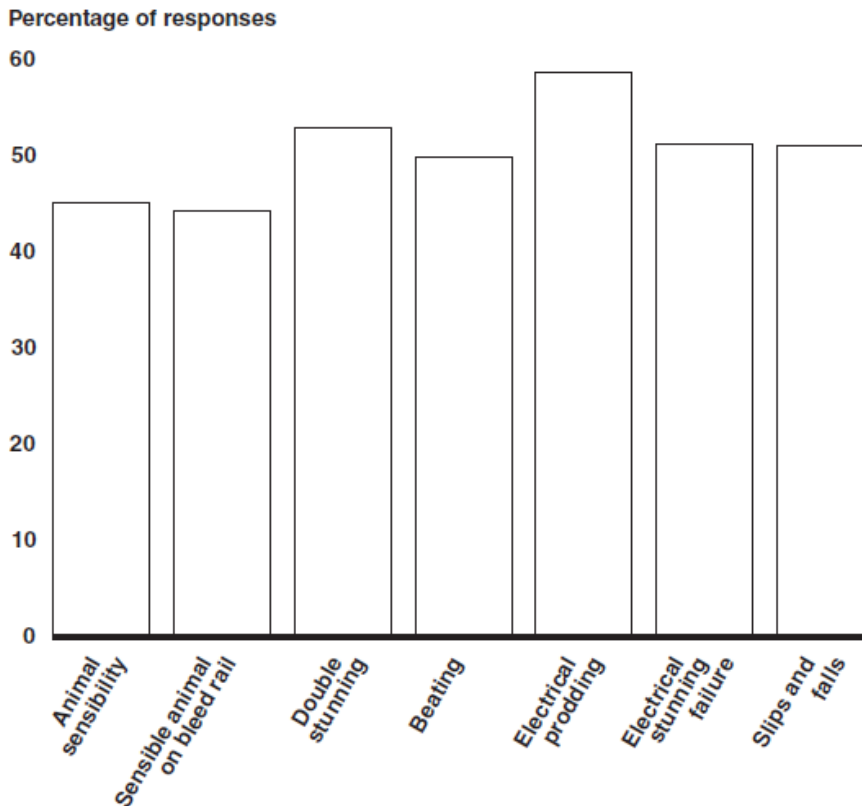
- 2 Pen/Ground Conditions
- 3 Conscious animal
- 4 Access to water
- 5 Handling disabled/sick
- 6 Other
- 7 Excessive force
- 8 Excessive use of electric prod
- 9 Access to food

H. GAO HUMANE METHODS OF SLAUGHTER ACT (CATTLE) WEAKNESSES IN USDA ENFORCEMENT (2010)

<http://www.gao.gov/assets/130/124119.pdf>

Excerpt Graph pg 4

Figure 2: Inspectors Identified the Need for Additional Guidance and/or Training in Seven Key Areas of Humane Handling Enforcement



Source: GAO analysis of survey results.

1. Animal sensibility
2. Sensible animal on bleed rail
3. Double stunning
4. Beating
5. Electrical prodding
6. Electrical stunning failure

7. Slips and falls

<http://www.gao.gov/products/GAO-10-487T> Highlights - Inspection

“FSIS also does not have a current workforce planning strategy for allocating limited staff to inspection activities, including HMSA enforcement. Last, while FSIS has strategic, operational, and performance plans for its inspection activities, they do not clearly outline goals, needed resources, time frames, or performance metrics. Nor do these plans provide a comprehensive strategy to guide HMSA enforcement. In our report, we recommend, among other things, that FSIS take actions to strengthen its oversight of humane handling and slaughter methods at federally inspected facilities. “

I. IS COMMERCIAL TRANSPORTATION OF EQUINES TO SLAUGHTER HUMANE?

WITH ONLY 100 TO 150 THOUSAND HORSES FOR SLAUGHTER EACH YEAR IN THE US, THERE IS NOT ENOUGH HORSES TO JUSTIFY OR MAKE PROFITABLE A HORSE SLAUGHTER FACILITY IN EVERY LOCALITY. THERE HAS ALWAYS BEEN A LONG TRIP TO SLAUGHTER EVEN WITH THREE SLAUGHTER PLANTS IN THE US. LOOKING THEN AT EACH LOCALITY, IT IS NOT LEGAL TO SLAUGHTER DIFFERENT ANIMALS IN THE SAME FACILITY, AND IMPORTANTLY IT IS NOT LEGAL TO SELL HORSE MEAT FOR HUMAN CONSUMPTION IN THIS COUNTRY.

Federal Regulations: <http://regulations.justia.com/regulations/fedreg/2011/09/07/2011-22762.html>

J. TRANSPORT AND SALE BARN ABUSE (ANIMALS ANGELS) ANIMALS ANGELS 3 YRS DOCUMENTATION OF THE TRIP TO SLAUGHTER.

<http://www.animallawcoalition.com/horse-slaughter/article/1472> Please see Exhibit 4 at bottom

K. ABUSE INCREASE

Washington, DC (January 9, 2008) – Veterinarians for Equine Welfare (VEW) has just issued a new white paper entitled “Horse Slaughter – Its Ethical Impact and Subsequent Response of the Veterinary Profession.” The white paper was created to address misinformation being circulated by the American Veterinary Medical Association (AVMA) and other organizations opposing a potential ban on horse slaughter in the US and exportation of horses for slaughter.

http://www.vetsforequinewelfare.org/white_paper.php

L. GAO REPORT ACTION NEEDED TO ADDRESS UNINTENDED CONSEQUENCES FROM CESSATION OF DOMESTIC SLAUGHTER – RECOMMENDS BAN ON HORSE SLAUGHTER

Excerpt second cover page, of above GAO Report.

“What GAO Recommends”

“GAO suggests that Congress may wish to reconsider restrictions on the use of federal funds to inspect horses for slaughter or, instead, **consider a permanent ban on horse slaughter**. GAO recommends that USDA issue a final rule to protect horses through more of the transportation chain to slaughter and consider ways to better leverage resources for compliance activities. USDA agreed with GAO’s recommendations and noted specific actions it will take to implement them. “

<http://www.gao.gov/assets/320/319926.pdf>

M. TRANSPORT OF HORSES TO SLAUGHTER COMPOUNDS EQUINE SUFFERING

http://www.vetsforequinewelfare.org/white_paper.php excerpt

Despite the presence of federal regulations governing the transport of horses to slaughter, [1] horses continue to suffer immeasurably en route to slaughter. Current regulations are paltry, allowing for horses to be transported for more than 24 hours without food, water or rest. Heavily pregnant mares can be moved to slaughter, as can horses with broken limbs or who are blind in one eye. Further, the regulations only cover the final leg of the journey, so slaughter-bound horses moved from auction to feedlot, for instance, are not covered by the rule. The much touted (by the U.S. Department of Agriculture) ban on the use of double-decker vehicles to haul horses to slaughter only came into effect in December of 2006, despite pressure from welfare advocates to implement the ban with the final rule, which went into effect in early 2002 (the “double-decker ban” was phased in so as not to unduly impact the slaughter industry financially). Further and most significantly, because the ban only applies to the final leg of the journey to slaughter as previously mentioned, haulers can still move slaughter-bound horses across the country on double-deck conveyances designed for cattle and pigs and need only switch to single-deck trailers before arriving at the slaughter plant. Loading and unloading onto the rigs is stressful and injurious as horses must immediately go either up or down a relatively steep ramp to access one of the two floors. Because the trailers are divided into two levels and thus have low ceilings, many horses are unable to stand fully upright and are forced to travel in a bent position.

Not only are double-deck trailers inhumane, they are dangerous due to their high center of gravity. Numerous heart-wrenching and lethal accidents have occurred in recent years in which double-deck trailers were carrying horses to a middle-point along the route to slaughter. The results were grisly and absolutely avoidable. The U.S. Department of Agriculture is now seeking to broaden the scope of the transport regulations to cover all legs of the journey to slaughter but it is too little too late, particularly given that the domestic horse slaughter plants have been shuttered.

N. COMMERCIAL TRANSPORTATION OF EQUINES TO SLAUGHTER, 55213-55217 [2011-22762]

<http://regulations.justia.com/regulations/fedreg/2011/09/07/2011-22762.html>

O. COMMERCIAL TRANSPORTATION ISSUES ANIMALS ANGELS :

<http://www.animallawcoalition.com/horse-slaughter/article/1472> See Exhibit 4 bottom web page, Animals Angels.

P. PETITION TO CREATE RULES AND REGULATIONS GOVERNING THE SALE, TRANSPORT AND PROCESSING OF HORSES AND HORSE MEAT INTENDED FOR HUMAN CONSUMPTION

http://www.fsis.usda.gov/PDF/Petition_SchiffHardin_040612.pdf

Q. SLAUGHTER HOUSE ABUSES – KAUFMAN TEXAS

“Horse slaughter is a barbaric, inhumane practice. Given their natural flight instinct, there is no way to humanely slaughter horses. Often horses are dismembered while fully conscious. The following includes images of this horrific practice obtained through FOIA requests” Dr. Mary McNichols :

<http://www.kaufmanzoning.net/foia.htm>

If you would like any further information about horse slaughter, the following link—which includes information obtained through FOIA requests about this egregious practice—will provide you more than enough research: <http://www.kaufmanzoning.net/>

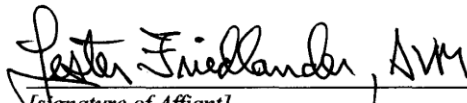
R. AFFIDAVIT FORMER USDA VETERINARIAN- LESTER FRIEDLANDER DVM - CAPTIVE BOLT IS NOT AND CANNOT BE, IN COMPLIANCE WITH HUMANE SLAUGHTER ACT

To: 1- 301- 474-6113

AFFIDAVIT

The undersigned Affiant, being first duly sworn, deposes and says:

_Distinguished Members of Congress, my name is Dr. Lester Friedlander and I am a former USDA Veterinarian. I am refuting the testimony of Dr. Bonnie Beaver, DVM, that the captive bolt is a humane procedure of euthanasia for horses. The captive bolt does not meet the humane method of slaughter, as described in the 1958 "Humane Slaughter Act." Head restraints are not used in the slaughter of horses and therefore do not comply with the Statue. The captive bolt is used in cattle, due to the fact the cow's brain is more anterior than the horses's brain and the penetration of the bolt is more effective. Horses are not, and can not be restrained, during horse slaughter. I have seen several video tapes of horse slaughter where the horses have to be struck with the captive bolt several times. No head restraints were used; to do so would cause these flight animals to break their necks. During these multiple times of striking the horses head with the captive bolt, the horses are in pain and suffering. It is important to know that the captive bolt does not kill the horse, nor was it ever intended to. The horse must be exsanguinated to be suitable for human consumption. As the captive bolt is not a proper instrument for the slaughter of equids, and these animals regain consciousness thirty seconds after being struck, they are fully aware they are being vivisected. Ergo, the use of the captive bolt for equids is a violation of the Humane Slaughter Act of 1958. I ask you to support HR 503 and S. 311 in the best interest of horses.


[signature of Affiant]

Lester Friedlander, DVM

RR6 Box 6075A, Pennsylvania Avenue

Towanda, Pa. 18848

NOTARIZATION

I certify that, on this 29th day of FEBRUARY, 2008, before me, a Notary Public,

LESTER FRIEDLANDER, DVM,

[] whom I know personally to be the person who signed the above document

S. HORSE SLAUGHTER IS NOT HUMANE EUTHANASIA

It is the united opinion of VEW that horse slaughter is inhumane, and that it is an unacceptable way to end a horse's life under any circumstance. One need only observe horse slaughter to see that it is a far cry from genuine humane euthanasia. From the transport of horses on inappropriate

conveyances for long periods of time without food, water or rest to the very ugly slaughter process in which horses react with pain and fear, no evidence exists to support the claim that horse slaughter is a form of humane euthanasia. Rather, it is a brutal process that results in very tangible and easily observable equine suffering.

It is worth noting that the suffering of horses in slaughter is accentuated by the very fact that they are not raised for slaughter. Horses going to slaughter have largely been accustomed to close human contact whether through racing, ranch work, pleasure riding, rodeo or any of the other ways in which horses are used in this country. While some are purposely sold into slaughter by their owners most end up at the abattoir through pure bad luck: they were sold at auction and the winning bidder was a "killer-buyer" working for one of the slaughter plants. To suddenly be treated as pure livestock must be disorienting and frightful, and can only compound their suffering as they proceed to slaughter.

We believe that it is an unethical and dangerous practice for the American Veterinary Medical Association (AVMA) and American Association of Equine Practitioners (AAEP) to attempt to equate horse slaughter with humane euthanasia.

http://www.vetsforequinewelfare.org/white_paper.php

T. USE OF CAPTIVE-BOLT IN HORSE SLAUGHTER WHOLLY UNACCEPTABLE

The use of the captive-bolt gun, which is commonly used in the slaughter of livestock (including horses), has been a point of great contention in the debate on horse slaughter. Because it can theoretically be used by a veterinarian - in specific circumstances - to euthanize horses, the AVMA has tried to equate its use in the slaughterhouse with humane euthanasia. To clarify, the captive-bolt gun is a mechanical method by which, in ideal circumstances, animals can be rendered immediately unconscious (not killed) through a quick blow to the brain by a metal bolt prior to actual slaughter. However, in order for the method to work as intended, the captive bolt must be administered properly. According to the AVMA's own guidelines, the head of the animal to which the captive bolt is being applied must be restrained^[2] or still and a highly skilled individual. In the slaughterhouse none of these best case scenarios are in place: the horse is most likely panicked, its head is unrestrained, and the person administering the captive bolt is a low-paid worker who is expected to move horses through the kill line at high speed. Herein lays the controversy surrounding the use of the captive bolt in horse slaughter.

In its 2007 AVMA Guidelines on Euthanasia, the AVMA rates the use of the captive bolt to euthanize horses as "acceptable". However, it is the opinion of VEW professionals that this categorization was based on studies conducted on species other than equine. No studies are cited in the 2007 AVMA Guidelines on Euthanasia that any scientific research has ever been conducted to determine the humaneness or efficacy of the captive bolt gun for use specifically on horses.

Further review finds that within the 2007 AVMA Guidelines on Euthanasia denoted reference #112- - Australian Veterinary Association (AVA), Guidelines for Humane Slaughter and Euthanasia. *Australian Veterinary Journal* 1987:64:4-7 is contradictory to the opinion of the AVA reference itself.

The Australian Veterinary Association clearly states the following:

Horses:

Abattoirs--- "An adequate caliber firearm or a humane killer may be used to render the horse unconscious for bleeding. The captive bolt pistol is not satisfactory for horses since firm pressure on the forehead is essential for its effective use and this tends to be resisted by the horse. This problem applies to a lesser extent with the humane killer".

Therefore, it is the united conclusion of VEW professionals that the captive bolt should be deemed "conditionally acceptable" and used only in emergency (non-slaughter) situations where no other option exists to humanely end a horse's suffering or when advanced circulatory dysfunction might diminish the efficiency of chemical euthanasia. Even then it must be administered properly. When used in the slaughter context it is not equitable with humane euthanasia.

http://www.vetsforequinewelfare.org/white_paper.php

U. THE FOREIGN-OWNED PLANTS IN THE U.S. ARE NOT A BETTER ALTERNATIVE THAN HORSE SLAUGHTER PLANTS OVER THE BORDER.

The plants in the U.S. have been prohibited from slaughtering horses for good reason. Undercover footage from inside these facilities demonstrated how horrific these plants were: Many horses were conscious when they were shackled and hoisted by a rear leg to have their throats cut.

There is a history of abuse and cruelty at the U.S. plants, including employees whipping horses in the face and horses giving birth on the killing floors. The USDA recently released photos of horses with protruding broken bones, eyeballs hanging by a thread of skin, and open wounds—all taken at U.S. horse slaughterhouses.

http://www.humanesociety.org/issues/horse_slaughter/facts/facts_horse_slaughter.html

5. EQUINE SLAUGHTER HOUSE JOBS

A. THREE SLAUGHTER HOUSES EQUAL ONLY 170 JOBS

The following is a letter from Paula Bacon to the Wall Street Journal, written several years before the citizens of Kaufman, Texas finally managed to rid themselves of the Belgian-owned horse slaughterhouse, Dallas Crown—after a battle spanning over 25 years:

"To the Editor

The Wall Street Journal

RE: article "Why Belgians Shoot Horses in Texas...."

I read with great interest your recent article on horse slaughter.

I am mayor of Kaufman, I have learned a great deal about horse slaughter, and I can say without reservation that the horse slaughter industry causes significant hardship to my community.

You state that "So far, economic arguments have prevailed over the emotional appeals of the anti-slaughter forces."

If economic arguments had in fact prevailed, then the screen door ought to have banged the backside of Dallas Crown 25 years ago as they departed Kaufman. Instead they have used my city like a door mat.

In January 1986, then Mayor Harry Holcomb said, "Quite frankly, we don't want you here!" when Dallas Crown came to the City Council with a plan to re-open. With zoning and vested rights they did re-open, but the city manager assured, "if they violate ordinances, we can close them down" [Kaufman Herald, 1/23/86].

Not so, as it turns out. Dallas Crown has a long history of violating ordinances, as do the other two horse slaughter plants in Fort Worth and DeKalb. "Dallas Crown continually neglects to perform within the standards required of them," a recent city staff memo advises, one of dozens of such memos.

But the city doesn't have the resources to outspend Dallas Crown in legal wrangling. Recently, after receiving 29 citations for failing waste-water tests 60% of the time, Dallas Crown demanded 29 separate jury trials.

Then Dallas Crown banned the city from testing for 9 months-though it is required by law, signed agreement and court order. Upgrades to the Wastewater Treatment Plant, which said testing is designed to protect, will cost 2,100 sewer customers \$6 million.

A repellent history of violations that includes blood spills, putrid odors, and horse remains in nearby yards continues to this day.

As unwilling host to a horse slaughter plant, I believe my city should have a voice in the economic argument. In Kaufman, horse slaughter is the reverse of economic development. Dallas Crown drains our resources, thwarts economic development and stigmatizes our community.

All 3 of the horse slaughter plants in the U.S. employ a total of fewer than 200 people. They cost American taxpayers \$5 million annually in federal funding for oversight, USDA inspections, transport inspections, etc., according to federal officials. There is no economic justification for horse slaughter.

In your article Monsieur Kemseke, one of a long line of managers who "neglected to perform within the standards required of them" and an owner of Dallas Crown, notes that he paid for the over-sized flag that greets drivers coming into town, and wonders who will buy the next one if Dallas Crown closes.

Kemseke's cavalier and insincere concern over our financial ability to purchase an American flag perfectly illustrates the horse slaughter "industry" in the U.S.: Horse slaughter ridicules American values while gouging our resources.

The flag does not make up for the economic and stigmatizing drain that Dallas Crown has brought our community. A \$100 flag in the face of the \$6 million cost to taxpayers? Perfect. This is the brand of corporate citizen Dallas Crown is to Kaufman, and the kind of industry horse slaughter is to the U.S.

Please. Spare us from any more of this supposed charity.

Sincerely,

Paula Bacon

Mayor, City of Kaufman"

B. EQUINE SLAUGHTER HOUSE IN NEW MEXICO JOBS

Though New Mexican's have been told by the Dept. of Agriculture recently that there are 60 to 90 thousand horses wandering around New Mexico, WHOA has determined by Inspection of Public Record request that there have been no counts and that the special interests have stated there are "tens of thousands of horses". Rather, equine numbers on public lands total less than 1000 while cattle on State Lands, Forest Service Lands, and BLM

lands total 426,652. This cattle number does not take into account cow and calf. The total number then is almost double that.

http://www.sandovalsignpost.com/jul12/html/around_town.html

6. ALTERNATIVES TO HORSE SLAUGHTER

A. IMMUNE CONTRACEPTIVE PZP PORCINE ZONA PELUCIDA (FOR FREE ROAMING HORSES – DARTABLE)

The zona pellucida (ZP) is a glycoprotein membrane that surrounds all mammalian eggs. Certain proteins in the membrane serve as the sperm receptor. The contraceptive vaccine produced by the SCC uses the ZP from the pig, thus the name **porcine zona pellucida** (PZP). Briefly, the PZP is produced by a complex process whereby the ZP is removed from the ovum, its glycoproteins extracted, isolated, and converted into a vaccine. The vaccine stimulates the target animal to produce antibodies, which attach to its own ZP, thus blocking fertilization and causing contraception. The **PZP vaccine** is usually given, initially, in a series of 2 vaccinations 2-6 weeks apart and then a booster every 8 months to a year, depending on the species. The PZP is emulsified with an adjuvant to stimulate the animal's immune system. Please go to our [Protocol page](#) for additional information.
<http://www.sccpzp.org/what-is-pzp/>

B. PZP Q&A

<http://www.sccpzp.org/wp-content/uploads/PZP-QA-June-6-2012.pdf>

C. LIMIT DOMESTIC BREEDING ESPECIALLY - QUARTER HORSE AND THOROUGHBRED INDUSTRIES EUTHANASIA RENDERING CREMATION COMPOSTING

With 9 Million horses in the US and 900,000 of them dying and being properly disposed, it is clear that slaughter is not a needed option and the 100,000 or so horses that are in the slaughter pipe line could be absorbed into the existing alternatives. Patience O'Dowd WHOA

D. NEW MEXICO STATUTES ALLOW EUTHANASIA TECHNICIANS AT RESCUES TO BE TRAINED.

77-1B-2. Definitions. (Repealed effective July 1, 2014.)

As used in the Animal Sheltering Act:

A. "animal" means any animal, except humans, not defined as "livestock" in Subsection L of this section;

B. "animal shelter":

(1) means:

(a) a county or municipal facility that provides shelter to animals on a regular basis, including a dog pound; and

(b) a private humane society or a private animal shelter that temporarily houses stray, unwanted or injured animals through administrative or contractual arrangements with a local government agency; and

(2) does not include a municipal zoological park;

C. "board" means the animal sheltering board;

D. "department" means the regulation and licensing department;

E. "disposition" means adoption of an animal; return of an animal to the owner; release of an animal to a rescue organization; release of an animal to another animal shelter or to a rehabilitator licensed by the department of game and fish or the United States fish and wildlife service; or euthanasia of an animal;

F. "emergency field euthanasia" means the process defined by rule of the board to cause the death of an animal in an emergency situation when safe and humane transport of the animal is not possible;

G. "euthanasia" means to produce a humane death of an animal by standards deemed acceptable by the board as set forth in its rules;

H. "euthanasia agency" means a facility that provides shelter to animals on a regular basis, including a dog pound, a humane society or a public or private shelter facility that temporarily houses stray, unwanted or injured animals, and that performs euthanasia;

I. "euthanasia drugs" means non-narcotic schedule II or schedule III substances and chemicals as set forth in the Controlled Substances Act [[30-31-1 NMSA 1978](#)] that are used for the purposes of euthanasia and pre-euthanasia of animals;

J. "euthanasia instructor" means a veterinarian or a euthanasia technician certified by the board to instruct other individuals in euthanasia techniques;

K. "euthanasia technician" means a person licensed by the board to euthanize animals for a euthanasia agency;

L. "livestock" means all domestic or domesticated animals that are used or raised on a farm or ranch and exotic animals in captivity and includes horses, asses, mules, cattle, sheep, goats, swine, bison, poultry, ostriches, emus, rheas, camelids and farmed cervidae but does not include canine or feline animals;

M. "rescue organization" means an organization that rescues animals and is not involved in the breeding of animals;

N. "supervising veterinarian" means a person who is a veterinarian, who holds both a valid New Mexico controlled substance license and a valid federal drug enforcement agency license and who approves the drug protocols and the procurement and administration of all pharmaceuticals; and

O. "veterinarian" means a person who is licensed as a doctor of veterinary medicine by the board of veterinary medicine pursuant to the Veterinary Practice Act [[61-14-1](#) NMSA 1978].

History: Laws 2007, ch. 60, § 2; 2009, ch. 102, § 4.

E. RETRAINING – PROVIDING JOBS

Prison Programs

Therapy Programs

Eco-tourism Programs

4 H Programs

Alternative Energy Projects

F. NO OTHER METHODS OF EQUINE SLAUGHTER COMPLY WITH THE HSA OF 1958

http://www.manesandtailsorganization.org/captive_bolt.htm

(1) Electrocutation– has been defined as 'cruel' by the American Horse Show Association in response to owners who have electrocuted their horses for insurance money. Federal Courts have upheld the Association's contention that electrocution is cruel. Therefore, it cannot be used as a method of humane slaughter for equines.

(2) Drug Overdose– this method saturates the tissues and leaves residues thereby making the meat inedible.

(3) Carbon Monoxide–this method saturates the tissues and leaves residues thereby making the meat inedible.

(4) .22 Caliber GunShot– This particular firearm is inappropriate for equines due to the thickness of the skull structure of an equine. Using the .22 caliber rifle does not achieve instantaneous insensibility of equines. Larger caliber firearms such as a 9mm or .357 are required to efficiently penetrate the skull and cause the massive brain destruction necessary to achieve instantaneous insensibility. (Source: Procedures for Humane Euthanasia of Sick, Injured and/or Debilitated Livestock - <http://lacs.vetmed.ufl.edu/HumaneEuthanasia/gun.htm>). Additionally, the horse cannot be restrained and this method is dangerous to workers.

According to Dr. Ellen Buck, DVM, and Director of the Equine Protection for The Humane Society of the United States 8 “The HSUS considers irresponsible breeding to be one of the major concerns facing horses and their owners, yet arguably one of the more easily corrected.” And “With thoughtful and responsible breeding, we could get this problem under control in just a few years.” Promoting easily accessible and low-cost gelding clinics, in addition to launching a national campaign that would encourage responsible breeding, and controlling and regulating breeding practices would help reduce horse populations to a manageable level. In addition, discontinuing breeding incentives, which is the root cause of the horse market crisis; creating a foal impact fee for all breeders, making them not only assume responsibility, but saving and generating funds for costs associated with gelding and euthanasia programs; and persuading Congress to provide grants to veterinarians for euthanasia programs for those who can’t afford it, and cremation for areas that don’t allow equine burial. **Federal**

veterinarian equine welfare grants would be drastically less costly to the government, as well as the American taxpayer than beginning USDA inspections of horses for slaughter.

<http://americansagainsthorseslaughter.com/uploads/AAHS-Horse-Slaughter-Truth-Deception.pdf>

G. STOP INCREASING QUOTAS OF PREDATORS.

H. EUTHANASIA, RENDERING, COMPOSTING, CREAMATION

These are the alternatives used by most or the other 900,000 horses who die annually would also be in the slaughter pipeline. Prices vary across country, however, the amount of money it takes to care for a horse for one or two months will cover these costs.

7. ROOT CAUSE OF THE “UNWANTED HORSE ISSUE

A. DUMPING OF HORSE BY KILLER BUYERS AFTER REJECTION AT THE MEXICO BORDER

WHOA contends Slaughter is the cause; “Dumping” is referring to horses that are taken to slaughter but are not accepted. The kill buyer may then dump these horses thereby creating the UNWanted Horse population. This would end if there were no slaughter facilities.

THE EUROPEAN COMMISSION FINAL REPORT OF A MISSION CARRIED OUT IN MEXICO REF. ARES(2011)398056 - 11/04/2011, STATES ON PAGE 7:

“Data for 2010 presented by staff of the OISA visited showed that, out of 630 consignments of live horses for slaughter, 58 were rejected after documentary checks and a further 226 consignments had animals rejected. At the six OISAs involved in imports of live horses from the US, 5 336 live horses in 631 consignments were rejected out of 62 560 animals presented for import between January and October 2010.”

B. OVER BREEDING

C. RHETORIC, SEE IPRA RESULTS IN NEW MEXICO APPENDIX 1

D. LACK OF USE OF AVAILABLE BIRTH CONTROL WILD HORSES – SEE ALTERNATIVES.

E. FEDERAL GOVERNMENT ROUND UPS, REMOVING HORSES, REPLACING WITH CATTLE, REFUSING TO UTILIZE BIRTH CONTROL FOR 25 YEARS THOUGH IT IS IN THE 1971 ACT WHILE WIPING OUT THEIR NATURAL PREDATORS FOR PROTECTION OF NON-NATIVE LIVESTOCK WHICH EVOLVED ONLY IN ASIA (CATTLE)

F. GAO REPORT - ANIMAL DAMAGE CONTROL PROGRAM EFFORTS TO PROTECT LIVESTOCK FROM PREDATORS -OCT 1995

TAX MONIES USED TO KILL NATURAL PREDATORS NATIONWIDE – 4 STATES SHOWN HERE

PUBLIC LANDS ARE KILLING FIELDS

Table II.1: Number of Livestock Predators Killed by ADC Personnel Nationwide and in Four Selected States, Fiscal Years 1991-94

	Technique used						Total
	Aerial hunting	Neck snares	M-44s (poison capsules)	Shooting ^a	Leg-hold traps	Other ^b	
Nationwide							
1991	29,555	13,135	27,962	13,580	19,322	6,891	110,445
1992	33,844	13,261	28,713	11,881	16,785	8,524	113,008
1993	38,383	13,916	25,904	11,634	12,631	7,385	109,853
1994	30,043	14,721	25,692	11,286	12,250	7,847	101,839

G. COSTS TO THE TAXPAYER – PREDATOR CONTROL NEW MEXICO

In addition to the cost of losing our valuable wildlife and the damage to our fragile ecosystems, Wildlife Services represents a tremendous burden to the taxpayers of our state. **Over \$3.1 million was spent to slaughter wildlife in 2009 in New Mexico, with 45% of the funding coming straight from New Mexico taxpayers and the rest from federal tax money.** \$2.8 million (or 91%) of this expenditure was specifically for the benefit of the agricultural industry*. USDA's own data, however, calls into question the necessity of these wildlife kills—a 2010 USDA report found that only 0.23% (one quarter of one percent) of cattle across the nation are actually lost to native predators and dogs. Consider the magnitude of these yearly expenditures and that they represent a taxpayer subsidy to private business interests at the expense of native wildlife. Surely the state and federal government can find more deserving places to spend this money."

<http://apnm.org/campaigns/adc/>

COSTS TO THE TAXPAYER – Predator Control Nationally –

H. WILD LIFE EXTERMINATION - COST MORE THAN ENTIRE NATIONAL WILD HORSE AND BURRO BUDGET

Wildlife Services, a division of the Department of Agriculture kills millions of other wild animals at a cost of \$**100 million dollars per year on our public lands**. More than the entire Wild Horse Budget of any recent year. (per NRDC/Natures Voice)

8. APPENDIX

A. NEW MEXICO'S "HORSE PROBLEM" PROXIMITY TO SLAUGHTER

NEW MEXICO'S "HORSE PROBLEM" PROXIMITY TO SLAUGHTER

Patience O'Dowd WHOA 2/4/13

WITHOUT HORSE SLAUGHTER, ABANDONMENT IS AN ISOLATED AND ILLEGAL OCCURANCE. WITH SLAUGHTER, ABANDONMENT BECOMES SYSTEMATIC BY NECESSESITY.

SLAUGHTER, IN AND OF ITSELF, IS THE CAUSE OF THE OVERTLY ADVERTISED “UNWANTED HORSE” PROBLEM IN NEW MEXICO. HORSES ARE REJECTED FOR SLAUGHTER AT THE MEXICAN BORDER AS SICK, PREGNANT, UNGELDED ETC. EUROPEAN UNION REPORTS SHOW THAT 8.5% OR **OVER 5000 HORSES PER YEAR OF THE OVER 60,000 HORSES SHIPPED TO MEXICO FOR SLAUGHTER ARE REJECTED AT THE BORDER, BUT TO WHERE?**

THE NEW MEXICO ADMINISTRATION KNOWS OF THESE HORSES BEING RELEASED, BUT THE NMLB **ESTRAY NUMBERS (71YR)** IN NO WAY REFLECT THE THOUSANDS OF HORSES REJECTED (OVER 5000/YR). WHOA HAS INFORMATION THAT SUGGESTS THAT SOME OF THESE SLAUGHTER REJECTED HORSES ARE BEING DROPPED AT RANCHES IN NORTHEASTERN NM FOR REHAB IN ORDER TO BE SENT BACK TO MEXICO FOR SLAUGHTER THOUGH THE NM ADMINISTRATION IS NOT ADMITTING TO THIS.

THERE IS THE STRONG APPEARANCE THAT THIS ADMINISTRATION HAS BEEN WORKING WITH SPECIAL INTERESTS TO INTENTIONALLY MISLEAD THE PUBLIC, IN ORDER TO PUSH FOR THE NEED FOR A SLAUGHTER HOUSE IN NEW MEXICO.

1) **HORSE DUMPING BY KILL BUYERS**

In a letter to Governor Martinez on April 19th 2012, (See Section 1.A,) The New Mexico Cattle Growers' Association (NMCGA) and the New Mexico Farm & Livestock Bureau (NMFLB) request that the state of New Mexico convene a working group to identify solutions to “this extremely real and growing problem. . .”

In this letter it is admitted that “horses are destined for slaughter plants in Mexico. . .”

“Mexico will not accept intact studs (males) or pregnant mares. . .” “Numerous unwanted horses are merely hauled to an open space --- including private, federal, tribal or state lands. There they are either turned loose to fend for themselves or perhaps shot on-sight. These horses create grave concern for livestock owners and managers due to the potential for disease transmission. . .”

“Because of New Mexico's border with Mexico, the state is recipient of unwanted horses from the entire nation.”

2) **THE EUROPEAN COMMISSION FINAL REPORT OF A MISSION CARRIED OUT IN MEXICO REF. ARES(2011)398056 - 11/04/2011, STATES ON PAGE 7:** ec.europa.eu/food/fvo/act_getPDF.cfm?PDF_ID=9501

“Data for 2010 presented by staff of the OISA visited showed that, out of 630 consignments of live horses for slaughter, 58 were rejected after documentary checks and a further 226 consignments had animals rejected. At the six OISAs involved in imports of live horses from the US, 5 336 live horses in 631 consignments were rejected out of 62 560 animals presented for import between January and October 2010.”

That’s 8.5% percent of horses en-route to Mexico for slaughter are turned away at the border.

“The rejected horses are not monitored or linked to their shipper since APHIS does not maintain a database to trace slaughter tags of individual horses.”

<http://archive.constantcontact.com/fs022/1101655399670/archive/1106046671023.html>

3) ERRONEOUS ASSERTION OF THE NEED FOR HORSE SLAUGHTER:

During and since the Water and Natural Resources Committee in the summer of 2011, members of the New Mexico State Legislature have been presented with the ostensible need for horse slaughter.

These presentations and the April 19th 2012 letter referenced in no. 1 above, did include one governmental report: the 2011 “GAO Report to Congress, Action Needed to Address Unintended Consequences from Cessation of Domestic Slaughter.”

Notably, in both however, it has gone unmentioned, that this 2011 GAO Report, recommends that horse slaughter be ended.

4) SPECIOUS CLAIMS OF “TENS OF THOUSANDS” OF FREE ROAMING HORSES IN NEW MEXICO; PROOF BY ASSERTION: UNSUBSTANTIATED INFORMATION REPEATED OFTEN ENOUGH, BECOMES “TRUE.”

Inspection of public records requests to the New Mexico Department of Agriculture have shown that there have been no counts, census, or even informal surveys taken. See IPRA case no. 1112-47 response of Nov 28, 2012 at WHOANM.org.

5) DO NEW MEXICANS APPRECIATE OUR STATE BEING RECOGNIZED AS THE IN THE BOTTOM TIER IN TERMS OF ANIMAL CRUELTY?

<HTTP://ALDF.ORG/ARTICLE.PHP?ID=1895>

6) ABUSE INVESTIGATION BY ANIMALS ANGELS - In early 2012, New Mexico was shocked, and shamed nationally, by the results of a video investigation at one of our Livestock Auction houses. After almost 1 year, there has been no progress on this case no. D-1314-CR-201200271.

7) ANIMAL ENTERPRISE ACT (AETA) NEW MEXICO HAS ADOPTED THE DRACONIAN LANGUAGE OF THE FEDERAL ANIMAL ENTERPRISE ACT.

This appears to be an attempt to block future independent investigations of cruelty to animals? This Act is reminiscent of the Red Scare.

<http://abcnews.go.com/Blotter/ag-gag-laws-animal-cruelty-exposes-blocked/story?id=18337864>

8) BLAME GAME While stating that“ tens of thousands of horses . . . have been released across the state” <http://www.krqe.com/dpp/news/environment/horse-overpopulation-runs-wild-in-nm>, New Mexico’s officials have turned a blind eye, or rather, kept the secret of the root cause of these “releases”, in order to beat the drum for a slaughter house in New Mexico.

CONCLUSION

1. **THE PRACTICE OF SLAUGHTER CREATES THE UNWANTED HORSE PROBLEM** AND AN EGREGIOUS AMOUNT OF SUFFERING FOR TENS OF THOUSANDS OF HORSES AND THE ON GOING INTRODUCTION OF DISEASES INTO NEW MEXICO, IN ORDER FOR A FEW TO PROFIT FROM MEAT UNFIT FOR HUMAN CONSUMPTION. HENCE THE UNWANTED HORSE PROBLEM WILL BE OVER WHEN SLAUGHTER IS OVER.
2. **THE STATE OF NEW MEXICO'S ABILITY TO SOLVE PROBLEMS HAS BEEN SEVERELY THWARTED** BY AN UNWILLINGNESS TO WORK WITH EQUINE ADVOCATES, DUE TO SPECIAL INTEREST PREJUDICES. THIS HAS RESULTED IN UNNECESSARY FINANCIAL BURDENS AND MULTIPLE RISKS FOR THE PEOPLE AND HORSES IN THE STATE OF NEW MEXICO, AS WELL AS THE FURTHERING OF INCREDIBLE ABUSE AND SUFFERING OF THIS NATION'S HORSES. **THE TIME IS NOW TO WORK TOGETHER.**

SPECIAL THANKS TO JOHN HOLLAND PRES. OF EQUINE WELFARE ALLIANCE, TO DR. MARY McNICHOLS, AND TO KATIA LOUISE PRES. OF WILD FOR LIFE FOUNDATION – SAVING AMERICAS HORSES AND TO ANIMALS ANGELS – THEY TRULY ARE!

B. NM TASK FORCE INITIATION ON "EQUINE OVER POPULATION"

From: Parra, Anthony

Sent: Thursday, April 19, 2012 5:14 PM

To: Goetz, Katie

Subject: Fwd: Equine Welfare: What IS Humane?

Meant to copy you too!

Begin forwarded message:

From: "Parra, Anthony" <AParra@nmda.nmsu.edu>

Date: April 19, 2012 5:01:01 PM MDT

To: "Yvonne Alexander" <YAlexand@nmda.nmsu.edu>, "Rose Garley" <RGarley@nmda.nmsu.edu>, "Lesa Medina" <Lamedina@nmda.nmsu.edu>, "Amanda Romero" <ARomero@nmda.nmsu.edu>

Cc: "Larry Dominguez" <LDomingu@nmda.nmsu.edu>

Subject: Fwd: Equine Welfare: What IS Humane?

I want you To be aware of this in case we get a call from the governors office.

Begin forwarded message:

From: "Dominguez, Larry" <LDomingu@nmda.nmsu.edu>

Date: April 19, 2012 2:42:54 PM MDT

To: "Witte, Jeff M." <JWitte@nmda.nmsu.edu>, "Parra, Anthony" <AParra@nmda.nmsu.edu>

Subject: Fw: Equine Welfare: What IS Humane?

FYI, can provide more insight later.

----- Original Message -----

From: Caren Cowan [<mailto:carenroad1053@gmail.com>]

Sent: Thursday, April 19, 2012 02:22 PM

To: Myles Culbertson <myles.culbertson@state.nm.us>; Michelle Frost <nmwgi@nmagriculture.org>; Matt Rush <matt.rush@nmfarmbureau.org>; Owen, Les; Turner, Jason; Dominguez, Larry; Jose Varela Lopez <JJVLCHIMEX@aol.com>; Ty Bays <tyson_bays@fmi.com>; Mike Hobbs <mdhobbs@bacavalley.com>; John Romero <POI94005@Isletapueblo.com>;

Curt Kelling <kellingranch@plateautel.net>; Brian Moore
<brian@ranchmkt.com>; Bob Alexander <boblalexander@msn.com>

Subject: Equine Welfare: What IS Humane?

This went to Governor Martinez' office earlier today.

We need to explore other ways to utilize it. I have a call in to Matt Rush since NMFLB is on it as well.

Stay tuned!

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Equine Welfare: What IS Humane?

Perspective from the New Mexico Cattle Growers' Association &

New Mexico Farm & Livestock Bureau

April 18, 2012

The issue of "humane" care and treatment of horses has become extremely volatile in New Mexico and across the nation in recent weeks. Unfortunately, the problem isn't nearly so recent. The issue has been in the national spotlight long enough that the Government Accounting Office (GAO) has had time to do an indepth study, identifying the problems and pointing out challenges for the U.S.

Department of Agriculture as well as horse owners and lovers.

What are the options and the alternatives for unwanted and feral horses? Where does the funding come from? The New Mexico Cattle Growers' Association (NMCGA) and the New Mexico Farm & Livestock Bureau (NMFLB) respectfully request that Governor Susana Martinez convene a working group of livestock organizations, agencies and individuals to identify solutions to this extremely real and growing problem in New Mexico and across the United States.

The focus of this group should be on the quality of life for horses and the assurance for a humane end of life. Reality is that regardless of their use and the emotions tied to them. Horses, like all animals, have limited lifetimes.

New Mexico currently has only nine (9) certified horse rescue operations. There may be others taking in unwanted horses, but only these nine are certified by the New Mexico Livestock Board who is charged with the responsibility of humane oversight of horses and other livestock in the state. (<http://www.nmlbonline.com/index.php?id=23>)

These rescue operations are not government funded and operate largely on donations. Not only are these facilities not well distributed around the state, but capacity is limited. The ideal capacity for the entire group of certified rescues is 257 head --- those facilities are currently holding 266 horses.

Immediately prior to a sale, Southwest Livestock Auction houses up to 300 head of horses. Prior to the current investigation, Southwest routinely held four sales per month.

The cost of maintaining a horse varies with the age, size and condition of animal, but care and feeding just one emaciated horse, which is the condition most horses are in when rescued, can easily run from \$800 to \$1,000 per month, according to one rescue owner. Hay alone, which must be supplemented with grain, vitamins, and minerals as well as routine health care, presently runs at \$300 per month and up. Maintaining a healthy horse costs a minimum of \$150 per month.

Sadly, rescues are finding that when they do rehabilitate a horse, there are no permanent homes available for them. Additionally horses that cannot be rehabilitated then must be disposed of by the rescue.

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New Mexico, including tribal lands, is home to literally tens of thousands of feral or unwanted horses. Because of the drought and current economic conditions the

problem is growing literally by the moment. Families who were once able to maintain horses for enjoyment are now having to choose between caring for their families or their animals. A Coggins Test, which is required to transport a horse costs \$35 per head. Farrier or horse-shoeing expenses can run from \$40 to \$120 per month per head for regularly maintained horses, plus milage. Horses that have been neglected can be exponentially higher.

According to a 2005 survey by the New Mexico Horse Council, nearly 100,000 New Mexicans are involved in the equine industry. Within that group 72 percent of New Mexico horse owners have an annual household income of \$75,000 or less. The report also states that 76 percent of these owners are 30 to 60 years of age with only 13 percent under the age of 30.

When horses can no longer be cared for, the options for disposition are limited and cost prohibitive. While landfills have the option of accepting animal carcasses, few choose to and they come with strict requirements including an appointment to bring the carcass, a veterinary certificate indicating that the animal did not succumb to an infectious disease, and payment of special charges for heavy equipment and operators. These costs can easily add up to \$300 per horse carcass. That is added to the cost of euthanasia, which if done by a licensed veterinarian costs \$150 and up. Then the animal must be transported from its' location to the landfill, which can cost from \$180 to \$220.

On-sight burial requires heavy equipment and a permit the Public Regulatory Commission, with unknown impacts to water quality.

Selling unwanted or feral horses presents an entirely different set of problems. According to the GAO report, the price of horses has dropped dramatically since 2007 because there is little salvage value due to limited options for marketing. Many auction markets will not even accept horses and most of those who do will accept only those that are in healthy condition. The markets that do accept horses in lesser condition find that they soon are the recipients of numerous horses that are left, often in the dead of night which places a greater burden on limited Livestock Board resources.

Horses that go through auction markets that are not purchased as working or pleasure horses are destined for slaughter plants in Mexico. Those animals are loaded onto trailers averaging 30 head or more and trucked to the Mexico border. There they are unloaded and put on another truck to cross the international border. They are unloaded and put on yet another truck to travel up to 17 hours into the interior of Mexico for slaughter. Once the animals cross into Mexico, they are not subject to any US oversight and many of these plants are not subject to inspections.

Mexico will not accept intact studs (males) or pregnant mares. Feral or unwanted studs must be castrated, which if done by a veterinarian, can cost \$300 per head. If not done by a veterinarian, there are sanitary and recovery time issues. Mares are often allowed to foal, with the offspring left behind when shipped.

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Numerous unwanted horses are merely hauled to an open space --- including private, federal, tribal or state lands. There they are either turned loose to fend for themselves or perhaps shot on-sight. These horses create grave concern for livestock owners and managers due to the potential for disease transmission. Individual reports are that horses are routinely abandoned on tribal lands near Albuquerque leaving the tribes to deal with disposal.

Because of New Mexico's border with Mexico, the state is recipient of unwanted horses from the entire nation. This compounds the number of horses in distress

that New Mexico is home to.

There are numerous other facets to the current unwanted or feral horse problem that will require more in-depth consideration. Under the current drought with little water and forage available horses are doing an incredible amount of resource damage. Horse hooves have an entirely different impact on the ground the travel than cloven hoofed animals, compacting the soil rather than breaking it. Horses are also in competition with other domestic livestock and wildlife for scarce resources.

On the subject of animal cruelty investigations, New Mexico statistics follow the results found by the GAO. The New Mexico Livestock Board reports the following animal cruelty investigations from 2004 to present. The vast majority of these were horses. Not all of the investigations were founded, but required time and resources none the less.

2004 – 53

2005 – 38

2006 – 56

2007 – 41

2008 – 117

2009 – 128

2010 – 90

July 2011 to March 2012 – 91

The Board changed over to fiscal year statistics in 2011, so this number is skewed because the first 6 months of 2011 are not reported. The estimated calendar year number for 2011 would be well over 100.

Since the U.S. Department of Agriculture stopped inspection at horse slaughter plants in the U.S. in 2007, New Mexico's cruelty investigations have doubled on an annual.

Because of the varied nature of these investigations, it is impossible to provide a cost to the Livestock Board and the ranchers in New Mexico who fund the Board

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through inspections and mill levys even though the investigations are on behalf of all New Mexicans.

That GAO report entitled HORSE WELFARE: Action Needed to Address Unintended Consequences from Cessation of Domestic Slaughter was published in June 2011 and can be located at: <http://www.gao.gov/new.items/d11228.pdf> . In brief here is the object of the report and findings on cruelty.

Since fiscal year 2006, Congress has annually prohibited the use of federal funds to inspect horses destined for food, effectively prohibiting domestic slaughter. The U.S. Department of Agriculture (USDA) is responsible for overseeing the welfare of horses transported for slaughter.

In 2007, Congress directed GAO to examine horse welfare since cessation of domestic slaughter. GAO examined (1) the effect on the U.S. horse market, if any, since cessation; (2) any impact of these market changes on horse welfare and on states, local governments, tribes, and animal welfare organizations; and (3) challenges, if any, to USDA's oversight of the transport and welfare of U.S. horses exported for slaughter. GAO analyzed horse price and shipping data, and interviewed officials from USDA, state and local governments, tribes, the livestock industry, and animal welfare organizations, and reviewed documents they provided."

GAO found that since domestic horse slaughter ceased in 2007, the slaughter horse market has shifted to Canada and Mexico. From 2006 through 2010, U.S.

horse exports for slaughter increased by 148 and 660 percent to Canada and Mexico, respectively. As a result, nearly the same number of U.S. horses was transported to Canada and Mexico for slaughter in 2010—nearly 138,000—as was slaughtered before domestic slaughter ceased in the U.S.

Comprehensive, national data are lacking, but state, local government, and animal welfare organizations report a rise in investigations for horse neglect and more abandoned horses since 2007. For example, Colorado data showed that investigations for horse neglect and abuse increased more than 60 percent from 975 in 2005 to 1,588 in 2009. Also, California, Texas, and Florida reported more horses abandoned on private or state land since 2007. These changes have strained resources, according to state data and officials that GAO interviewed. USDA faces three broad challenges in overseeing the welfare of horses during transport to slaughter. First, among other management challenges, the current transport regulation only applies to horses transported directly to slaughtering facilities.

In conclusion, NMCGA and NMFLB looks forward to working with Governor Martinez and a working group to ensure that horses in New Mexico have quality life and humane end of life.

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