

Investigated and co-authored by Animal Wellness Action, Center for a Humane Economy and Animals' Angels

Horse Slaughter in North America: U.S. Live Exports Fade as Foreign Demand Abates

An Investigative Report on Horses and Other Equines Sent to Slaughter in Canada and Mexico



Summary and Key Findings

An investigation conducted by three national animal welfare organizations concludes that the slaughter of American horses, donkeys, and mules (collectively referred to in this report as "horses") for meat has become purely extra-territorial. "Kill buyers" and their cohorts send horses for processing to plants in Canada and Mexico because killing and butchering them for human consumption has been effectively barred on U.S. soil.

As a supplier and not a processor, the United States is no longer a large supplier of horses to the slaughter industry. It's an industry where supply and demand have cratered in recent years. That's noteworthy because decades ago, there were a substantial number of facilities operating throughout the United States. Now, not a single one operates, and there is no real prospect of a resumption of this kind of operation in the United States.

Still though, the United States has not divorced itself from this business, putting horses into the slaughter pipeline and funneling them to our two North American neighbors. After examining the treatment of horses at auctions, holding, and transport points, we conclude that these animals—most of whom provided years of faithful service and companionship or run free on public lands in the American West—are routinely subjected to a level of mistreatment inconsistent with the dictates of our anti-cruelty laws and at odds with the norms of our long-standing appreciation of these animals.

In 2007, a series of coincident maneuvers in the federal courts, in the Illinois Legislature, and in Congress led to the shuttering of all horse slaughter plants. At that point, the movement of U.S.-born horses for slaughter shifted exclusively to Canada and Mexico, which had slaughter plants operating not far from the U.S. borders to accept horses of American origin to supplement their in-country supply.

Congress, however, has not shut down the trade with our North American neighbors, allowing this economically and culturally marginalized industry to limp along. Animal Wellness Action, a national nonprofit organization devoted to legal standards against animal cruelty, initiated a successful, broadly supported amendment in the U.S. House of Representatives in 2021 to forbid live equine exports, but the U.S. Senate did not take up the matter, and it died.

Investigators operating on behalf of Animal Wellness Action and its affiliate, the Center for a Humane Economy, have spent the past few months in the field updating and adding to ongoing multi-year observations by Animals' Angels, also a non-profit organization, of unwanted horses sold at auction houses—the entry point for the pipeline to slaughter.

Investigators followed the trail of doomed horses being transported from kill pens, slaughter auctions, and other sale points to temporary holding pens, before shipping to their final destinations across our southern and northern borders.

In this report, Animal Wellness Action, the Center for a Humane Economy and Animals' Angels have assembled witness accounts and team observations at feedlots and inside slaughterhouses, interviews with industry employees and veterinarians, and transport data from the U.S. Department of Agriculture (USDA) and other agencies and authorities to provide a window into a little-understood, nontransparent slaughter trafficking of animals for meat ultimately destined for foreign markets in Europe and Asia.

This new report includes expert analyses by our equine welfare and legal experts and assesses dynamic changes reshaping the trade and putting the industry under serious threat of political dissolution.

To be sure, the raising and slaughtering of animals for food is a major business in the United States. The United States annually raises more than 9 billion chickens for meat, more than 330 million laying hens for eggs, 218 million turkeys, 120 million pigs, 35 million cattle, and 9 million dairy cows. But we treat horses differently. The nation doesn't raise any horses for slaughter but kill buyers do opportunistically gather up between 18,000 and 20,000 each year and put them into the slaughter pipeline, according to our investigation.

The raw totals of horses sent to slaughter, combined with our analysis of what's happening on the ground, reveal that there are no standards of animal care or oversight on the slaughterhouse floors among the actors in this business. While there is a debate about the treatment of cattle, pigs, and other animals, every one of those industries has its own voluntary animal-care standards, veterinarians, and professional standards. None of that was evident in completing this investigation. The number of horses in fact makes no meaningful contribution to global meat production, and at this level of operations, this process of slaughtering horses can hardly be called an industry of any economic consequence. It maintains no cohesive programs to provide for a minimum level of animal welfare for the horses diverted into the enterprise.

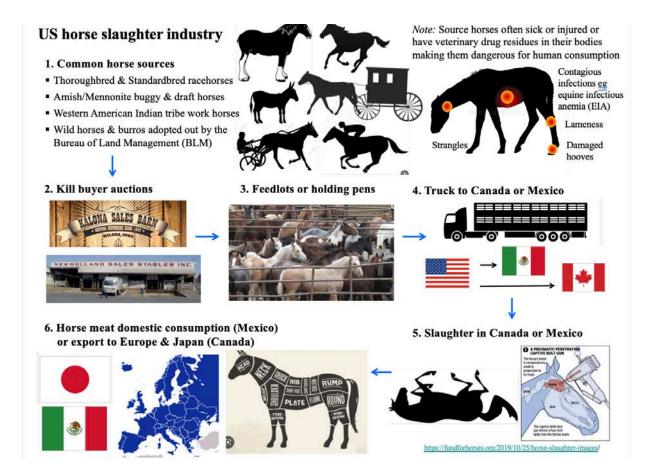
Key facts include:

- The slaughter of American horses each year has dropped from nearly 350,000 in the 1990s to 140,000 in 2007 to 20,000 today.
- The number of American horses shipped to slaughter plants in Mexico in 2022 was 16,362, which is down from 29,716 horses sent across the border to be slaughtered in 2020.
- The number of American horses shipped to slaughter plants in Canada, in 2021 was 5,139, which is down from 6,919 in 2020. (We are still waiting final numbers for 2022.)
- We found that the largest holding facility for "kill" horses in North America—a feedlot in Shelby, Montana, with capacity to upwards of 1800 horses in pens—cut ties with Montana's livestock agency last fall and shut its doors to holding American horses on their way to

slaughter. This is an important indicator of the fraying of the threadbare operations that keep the animals moving to processing facilities.

- We observed that the business of slaughtering of horses for human consumption—which
 now requires long-distance travel for nearly all horses, before the packaging of them as meat
 for inter-continental transport—has long depended on a stealthy, predatory network of kill
 buyers, dealers, intermediate feedlots, transporters, and foreign-based slaughter plants.
 Unlike food animals, these are not animals intentionally bred for slaughter, but instead
 castoffs from breeders and the myriad industries and uses to which they are put, as well as
 formerly wild horses removed from their western rangeland homes.
- Illegal acts, fraud, and misrepresentations are rampant throughout the horse slaughter industry. At many auctions, transactions take place where many horses are traded illegally from trailer to trailer in the auction's parking lot to evade detection of their involvement in the slaughter industry. Irresponsible racehorse owners, at substandard tracks, apparently do not want discarded animals to be discovered by auction visitors not tied to the slaughter industry.
- The consumption of horse meat in foreign markets is in free fall, and no restaurants, chefs or consumers in America are openly buying or selling it. Americans do not view horses as food, and there is no marketing effort by the industry to turn around that longstanding value system.
- The continuing mistreatment of horses in the slaughter pipeline is well documented here (photos, cases, and reports) and includes dragging downed horses from trailers, allowing foals to freeze to death outside and withholding help and relief to horses who cannot walk with obvious significant injuries for days while in holding pens. Healthy horses suffer injuries after they enter the pipeline, including being hit in the face by workers in one video.
- There is no enforcement structure to ensure compliance with laws and regulations, with the
 intermediate players in the industry having no rules and no government oversight. At export,
 there are limited disease surveillance issues, but nothing robust or designed to protect the
 horses from mistreatment.
- The circumstances of horse slaughter have changed dramatically in the last decade, and even more fundamentally compared to 25 or 50 years ago. The industry is driven not by "a surplus" of American equines or a caring or even a practical instinct to find a population equilibrium for our domestic population, but by an uneven and unpredictable foreign demand that has long been in rapid decline. If present trends continue, the slaughtering of American horses in foreign slaughter plants may head toward nil within 5 to 10 years. Even at current levels, there can be no logical argument that horse slaughter serves as any kind of major safety valve on the disposition of unwanted, elderly, or ill horses. There are more than 500,000 horses dying every year in the United States, and horse slaughter provides an end-of-life outcome for only 3% of them. Based on our investigation, we can hardly imagine a worse fate for horses then to be funneled into a ruthless, uncaring slaughter pipeline.

Sources of Horse Slaughter



1. Suffering Long Precedes Slaughter

In a joint investigation between the Center for a Humane Economy and Animals' Angels, the organizations found that horses who enter the slaughter pipeline endure suffering at each stage of the commercial process—from acquisition at auctions, to holding at short-term and longer-term facilities, to transport and slaughter.

Ongoing since 2007, the investigations from Animals' Angels reveal that the instant a horse is designated a "kill horse," handling and treatment deteriorate from horses classed as companions or working animals. It becomes a wait-and-see survival standard for our American horses until the intentional act of slaughtering and butchering.

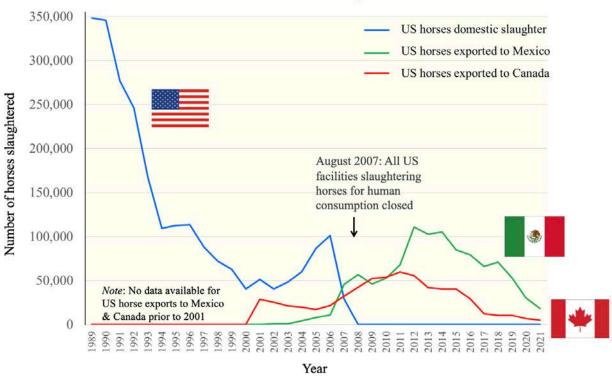
These horses have limited value while alive, and inputs in the form of feeding, watering, and care only diminish margins for "kill buyers" and others participating in the process of moving the horse to slaughter. If the "kill horses" were under the care of a different type of owner, humane officers and police would require, in keeping with state animal cruelty laws, proper

veterinary care and sufficient access to food, water and shelter. The "kill horse" often occupies a sort of legal limbo outside the gaze and the protection of enforcers of anti-cruelty laws, with the quotient of suffering increasing long before the horse is felled by the captive bolt or gunshot at a foreign slaughter plant.

This report summarizes independent findings from investigations carried out at auctions, feedlots, and slaughter plants. All locations selected for this report were chosen based on 15 years of investigating the horse slaughter industry.

In addition to onsite investigations, Animals' Angels and the Center for a Humane Economy also gathered information about the industry via Freedom of Information Act requests obtained from the U.S. Department of Agriculture, the Canadian Food Inspection Agency, the Mexican SENASICA and other relevant authorities. These findings are also included in this report.

US horses slaughtered for human consumption, 1989 to 2021: an industry in decline



Source: Animal Welfare Institute (https://awionline.org/content/horse-slaughter-statistics)

2. The current state of the U.S. horse slaughter industry

The North American horse slaughter trade is rapidly declining, with a steady drop in horses shipped to Canada and Mexico on a year to year basis. The drop is precipitous in looking over a decades-long time horizon. Multiple factors have contributed to this development:

Overview

	US HORSES	US HORSES
YEAR	SLAUGHTERED IN	SLAUGHTERED IN
	MEXICO ¹	CANADA ²
2014	105,335	43,513
2015	84,417	44,730
2016	78,724	35,624
2017	67,289	20,960
2018	70,397	10,568
2019	53,947	10,486
2020	29,716	6,919
2021	18,000	5,139
2022	16,362	2,829 (as of 9/30/22)

¹SOURCE: USDA AMS ²SOURCE: Agriculture & Agrifood Canada

- On Dec. 8, 2014, the European Union banned the import of all horse meat from Mexico (amending Decision 2011/163/EU), which had an immediate impact on the numbers of American horses shipped to Mexico for slaughter.
- On Oct. 17, 2016, EU Regulation 2016/1832 was implemented, which includes a provision requiring that all horses from the United States had to be kept in a Canadian feedlot for six months prior to slaughter and that a monitoring system had to be put into place to track residues and substances referred to in Annex I to Directive 96/23/EC. This measure had great impact on the U.S./Canadian horse slaughter industry and the number of horses shipped from the United States to Canada for slaughter dropped significantly.
- There has been a notable decrease in global consumer demand for horse meat due to animal welfare and food safety concerns. The primary consumers of horse meat from the Americas are Europeans, who over the past five years have become increasingly aware of the cruelty associated with the enterprise. Several joint media campaigns carried out by a coalition of animal welfare organizations in 14 countries, utilizing the evidence gathered of the horse slaughter industry in the United States and Canada, contributed to greater understanding and emotional discomfort. This concern was sufficient to cause several large grocery chains and importers to stop buying horse meat from the Americas, and the overall demand for horse meat plummeted.

Horse meat exports from Canada and Mexico also have declined significantly. In 2022, horse meat valued at \$4,000,000 was exported from Mexico to Japan (the largest importer), China, and Russia. Canada exported horse meat valued at \$28.6 million to nine countries (2021), with

Japan and Europe (France, Belgium, Italy, Germany, Luxembourg, Switzerland) being the largest importers. Canada slaughters horses in substantial numbers originating in that country.

3. Investigative Findings: Auctions

Horse auctions are the beginning of the horse slaughter pipeline. There are hundreds of sales across the country. For this report, we have selected those that stand out due to the large number of horses that go through the sale or the especially cruel treatment of these horses while at the sale.

3.1 Location: Kalona Auction, IA

Observations: The Kalona auction in lowa remains one of the largest slaughter horse auctions in the country.

The auction accepts horses for sale that have horrific injuries, are sick or severely emaciated. Most of these animals are bought by one of the kill buyers. At the sale, the slaughter prospects are kept separate from the riding/pleasure horses and are put in large pens holding close to 50 animals. Things are quickly in an uproar as dominant horses fight for space—our investigations have documented excessive kicking and biting.



Facial injuries

Leg Injuries





Downer horse

Severely limping, injured knee





Horses segregated and crushed by hydraulic gate





Hydraulic gate, continued

Additionally, the slaughter horses are separated before entering the auction ring by a hydraulic gate, which is very heavy and noisy. After the first horse goes through, the gate begins to close and crushes other, following horses with full force across their bodies or heads. The horses

panic, bolt and try to get away. Some horses appear to be extremely dazed after the gate hit them and stand stock still as other horses rush past them.

Overall, the handling of the slaughter horses by auction employees is very poor. Employees are observed hitting horses excessively or pushing wooden gates on them.





Emaciated horse left inside kill buyer's trailer

Aggression in crowded loose horse pen

3.2 Location: New Holland Auction, PA

Observations: The New Holland auction is known for the large number of former racehorses (both Standardbreds and Thoroughbreds) and discarded buggy and work horses from the surrounding Amish and Mennonite communities that are being sold every week. Many of these horses are emaciated or limping. Others show signs of Strangles, a highly contagious respiratory infection.

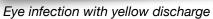
Draft horses are often brought in with horrific overgrown, cracked or curled up hooves. Again, most of these animals end up with one of the many kill buyers who frequent this sale.





Horse with disfigured, enlarged knee and bleeding foot sold to kill buyer Bruce Rotz







Emaciation



Downer Emaciation





Limping Standardbred sold in trailer-to-trailer transaction to kill buyer Bruce Rotz

Besides the official auction, many horses are traded illegally from trailer to trailer in the auction's parking lot. The reason is often that a racehorse owner does not want his discarded racehorse to be found by any regular auction visitor. At almost every sale, Animals' Angels has documented such trailer-to-kill-buyer's trailer transactions.

3.3 Location: Billings Auction, MT

Observations: The Billings auction is one of the largest slaughter horse sales in the United States. Every sale, approximately 500 "loose" horses, are sold to kill buyers from Canada, Colorado, Oklahoma, Texas, Arkansas and Montana.

Prior to the sale, the slaughter horses are moved to large pens behind the auction ring. A handler on horseback moves large groups of 30 to 40 horses forward into a pen.

The result is pure chaos—crammed in the pen like sardines, the horses begin to fight, kick and bite each other. Injuries are common.



Agitated horses in pen behind auction ring and foot injury sustained in the process



Loading of horses into already full trailer

Fresh leg injury

After the sale, the slaughter horses are put into pens all the way in the back of the facility. Some of them stay in these pens overnight, without access to shelter, even in the harsh Montana winter months.

It is the kill buyer's responsibility how and how many horses he loads into his trailer, there is no oversight by the auction. Animals' Angels has documented severely overloaded trailers and excessive force being used (slamming gates on the horse, beating, hitting over the head with a stick, poking) to get the animals into the trailer.



Snow covered pens with no shelter and no dry resting space with horses staying overnight

3.4 Location: Knoxville Auction, TN

Observations: The Knoxville horse auction is known for accepting horses in horrific condition for sale, some of them so emaciated or injured that they are barely able to stand. The majority of the loose horses at the sale is acquired by kill buyers who ship them to Mexico for slaughter.

Update 2022: It is important to point out that—while the auction still accepts horses in very poor condition—the numbers of horses going through this sale every month has significantly declined. The sale went from selling 300-500 slaughter horses twice a month to approximately 50 slaughter horses sold per month, which is another indication that the slaughter horse industry is declining.

When investigators visited the sale on Oct. 15, 2022, there were approx. 75 horses consigned to the sale, but more than 40 of them were riding horses and too expensive to be in any danger of being slaughtered for meat. Instead of five or more kill buyers bidding against each other to secure their loads, only one local buyer was present.





Severe eye infection

Emaciated and neglected



Horrific eye injury

Emaciated

3.5 Location: Murphy's Horse Auction, Mira Loma, CA

Observations: Nov. 13, 2021: Several horses inside the pen area were emaciated and exhibited obvious signs of a strangles infection, along with hooves that showed evidence of prolonged neglect. A battered, ten-year-old grey gelding was bleeding from a neck wound most likely caused by a saddle that had been left on for far too long. The same horse was covered in scars, and his hooves were overgrown and had curled up due to lack of trimming or even the most basic care. A horse with a closed, infected eye continued to rub his eye on the pen railing again and again in a futile attempt to find relief from his suffering.

The auction started just before 9 p.m. There were 51 horses tagged for sale in the pen area, where several signs had been posted stating that the shipment of any horse to slaughter is considered a crime in the state of California.

Those signs didn't stop California horse traders and suspected kill buyers David and Bubba Misner from attending the auction.

There is considerable evidence available since 2008 that David Misner is selling California horses to New Mexico kill buyer Dennis Chavez. In April 2008, the USDA was contacted by the California Department of Agriculture and was informed that the Ontario Police Department had received a complaint about David Misner allegedly selling horses to slaughter. An investigation was launched.

On Aug. 8, 2008 an IES investigator visited Southwest Livestock Auction and took a statement from Dennis Chavez. Chavez actually admitted to the USDA IES investigator that he was buying horses from Misner and that some of them were shipped to slaughter.





Eye Infection



Thin and sick



Bleeding neck injury

Overgrown hooves

Nevertheless, USDA investigators found that there was not enough evidence at that time to make the case.

While Bubba stayed inside the ring during the bidding, David Misner took up a bidding position outside the sliding door as if he didn't want to be seen. Several times the auctioneer called out that one of the horses had been sold "to outside" and stopped the bidding. Misner and his son capped their bids at \$500 as they bought the battered grey gelding, a toothless Paso Fino, and a 17-year-old standardbred mare before the sale ended well past midnight.

3.6 Location: Murphy's Horse Auction, Buckeye, AZ

Background information: The Buckeye horse auction in Arizona is also operated by the Murphy family. The auction has the potential to become a favorite of the kill buyers since it is conveniently located by the main transport routes to the Mexican border. Past investigations at this sale have shown that California horse trader Bubba Misner is a regular visitor of the auction.

Observations: Feb. 5, 2022: The truck and trailer of large-scale Nevada kill buyer Ole Olsen, who does business under the name Meadow Valley Ranch and who is known for supplying horses to Bouvry Exports & Dennis Chavez, was parked next to the sale barn.

Investigators observed a group of horses seemingly brought to the auction by the same seller, all of which looked worn-out and demonstrated clear signs of strangles, with runny noses and yellowish discharge coming from their eyes. There was a fresh cut on one horse's left front leg (possibly the result of a transport injury), and several of the horses were emaciated with their ribs clearly showing.



Inside a small, covered pen were two very young and emaciated yearlings, who were also visibly frightened as they huddled together trying to comfort each other.





Severe Emaciation

Sick Paint Horse

4. Investigative Findings: Kill Pens and Connected Online Broker Programs

From the auction, the slaughter horses are usually transported to the kill buyers collecting station until they are ready for shipment to a feedlot or for export. The decline of the horse industry and the reduction in the number of horses shipped to slaughter has caused significant financial loss for many of the slaughter buyers. To substitute income, several have come up with a new, even more lucrative business venture.

Online "Broker Programs" that sell horses on social media pages, using the threat of shipping the horse to slaughter as a way to entice private individuals to purchase the animal. Specifically, the online broker photographs the horses inside a kill buyer's lot and then posts these pictures on social media with a deadline. If no one buys the animal by that date, the horse is allegedly shipped to slaughter.

Special areas of concern:

- There is no oversight over these programs and all the horses (per the pages guidelines) are sold "as-is." Many of the horses sold have undisclosed injuries or sicknesses and it is not uncommon for a horse to die days after being sold.
- The online buyers often are thousands of miles away from the location of the animal and are unable to verify the identity of the animal or the required paperwork at the time of purchase. By the time the buyer actually arrives at the kill buyer's lot, he or she is often given a different horse and/or mismatched Coggins tests and health certificates. It is also common that if the buyer receives the correct animal, its condition has significantly deteriorated since information was first posted online. Buyers who complain are threatened, harassed, and bullied by the kill buyer and the online broker team. While the transaction might qualify as wire fraud, many buyers are too afraid to pursue a case.
- Horses with questionable or non-existing health paperwork are transported across state lines, which puts the equine industry at risk. For example, Strangles, a highly contagious disease, is found at most kill buyer lots. However, the spread of more severe contagious diseases such as Equine Infectious Anemia, is also a concern.

Recent example: Fabrizius Livestock, Eaton, CO

Jason Fabrizius is a longtime kill buyer who purchases U.S. horses for slaughtering in Mexico. Fabrizius also operates an online broker program that lists horses that are currently at his kill pen.

The conditions for the horses at his lot are extremely poor, the animals are only given limited amounts of food and veterinary care is virtually nonexistent.

Animals' Angels investigators documented many emaciated and sick horses during their last visit and also noticed that Strangles infections ran rampant at the lot. Additionally, they were informed by several individuals who had purchased horses from Fabrizius that they did not receive the proper health certificates and Coggins tests with their purchase.

On Nov. 1, 2022, Fabrizius Livestock was ordered to pay a civil penalty of \$210,000 for violation of the Animal Health Protection Act and the Commercial Transport of Equines to Slaughter Regulation. USDA Administrative Law Judge Tierney M. Carlos determined that Fabrizius was responsible for shipping a horse infected with equine infectious anemia (EIA) and 50 other horses that had been in contact with the EIA-positive horse across state lines. As a result, 293 horses in 12 states were potentially exposed to EIA and state and federal officials spent hundreds of hours trying to locate the animals in questions. In all, 67 of these horses were never traced and therefore potentially continue to spread the deadly disease.







Horses showing signs of emaciation (top left and top right), and one with a Strangles infection (left)

5. Investigative Findings: Feedlots, Export Pens

5.1 Location: Prime Feedlot, Alberta, Canada

Observations:

- The Prime feedlot is the largest slaughter horse feedlot in North America. Owned and operated by Bouvry Exports Ltd., which has a feedlot capacity that can fit 10,000 closely crowded horses.
- Horses are kept in dry pens with no access to shelter and no protection from the elements.
 Temperatures at the feedlot can drop to minus 30 degrees Fahrenheit in the winter. In the summer months, especially when it hasn't rained for a while, the feedlot turns into a dust bowl and the horses can be heard coughing nonstop.
- The feedlot is only operated by a handful of employees, which makes it nearly impossible to
 detect a horse in distress and in need of veterinary care in a timely manner. On every visit our
 investigators found adult horses and foals dead in the pen area, ripped apart by scavengers.
 We also found aborted foals and dead newborn foals, some frozen to the ground. Other
 observations include horses with severe Strangles infection, emaciated or sick horses.
- There is no hoof care provided for horses inside the feedlot. As a result, many of them have overgrown, curled up or cracked hooves, some to the point that it is difficult for them to walk or stand.
- U.S. horses are also delivered to this feedlot and are kept there for six months in order to comply with existing withdrawal periods for drug residues.





Foal carcass with signs of scavenger activity.

Decomposing mare



Examples of dead animals found at the feedlot



Nonexistent hoof care



No protection from the elements

5.2 Location: Bar S Feedlot, Shelby, MT

Background information:

- The Bar S Feedlot is also operated by Bouvry Exports Ltd. and serves as a collecting station for most of the horses the company acquires in the United States.
- The feedlot is a Quarantine lot, which means that any horse entering the lot can only leave to be slaughtered. Upon arrival at the feedlot, all horses are branded with the letter "S" on their shoulder.
- The lot has no protection from the elements and the horses (not even foals) have no access to shelter despite the brutal Montana winters. Temperatures can reach minus 30 degrees Fahrenheit.
- The feedlot has a well-documented issue with water pooling in the pen area, turning the pens into deep, treacherous mud holes. The unfortunate horses trapped in the deep mud often die a slow and agonizing death.
- Downer horses are killed by gunshot. Our investigators have witnessed the procedure and saw that the person shooting the horse did not confirm the onset of death.
- Dead horses often are not detected by feedlot employees for an extended period of time and scavengers feast on the carcasses next to other live horses.





Dead horse in pen with live horses

Downer horse being shot

Update September/October 2022: When investigators visited the feedlot on Sept. 26, 2022, it was empty. The gates were locked and there were no signs that horses had been in the pen area in recent weeks.

On Oct. 7, 2022, the Montana Department of Livestock received Bouvry Exports Ltd. official request to cancel the existing Memorandum of Understanding, stating that it closed the feedlot and intended to sell/lease it to a cattle company.

It is important to realize that the Bar S Feedlot has been a key location for Bouvry Export Ltd since 2006. The closure of the lot is therefore a strong indication that maintaining feedlot operations was no longer profitable due to the significant decline of the number of slaughter horses the company acquires in the United States.



Empty feedlot, Sept. 26, 2022

5.3 Location: Presidio Export Pens, Texas

Background Information:

The privately owned export pens in Presidio, Texas are one of the three remaining locations at the Southern border from where U.S. horses are shipped for slaughter in Mexico.

Prior to exportation, the horses are inspected by Mexico's National Service of Agro-Alimentary Health, Safety and Quality (SENASICA) and their fitness to travel is evaluated. Horses that are

rejected by the Mexican authorities are refused entry and have to remain in the export pens until they are picked up again by their U.S. shipper. Common reasons for rejection are injuries, emaciation, apparent sickness, or the presence of ticks. The Mexican authorities also don't allow the shipment of any stallions.

Once a horse is labeled a "reject," it loses all value and becomes a financial burden for the kill buyer, which often causes the animal's already minimum care to further decline. Multiple of our investigations at the Presidio pens have documented "rejects" in horrible condition, starving and with untreated injuries.





Emaciation

Festering Leg Injury

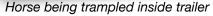
Observations Jan. 15-17, 2023:

Upon arrival at the location in Presidio it immediately became apparent that only one of the three pens appeared to be active. The Alvarado pens were in a state of disrepair, the roof of the building had caved in, and the entire property was covered in trash. There were no animals present. The Baeza pens also appeared very dilapidated, with broken fencing and abandoned transport trailers parked inside the lot. There was no activity during the entire time of the observation. One horse and one cow were present inside the pens.

At the J & R Horse Company pen, there were approx. 40 horses inside the pen area and most of them had USDA slaughter tags attached to them. Several of them were thin, with their ribs clearly showing. A few had smaller injuries on their legs, most likely obtained during transport.

Overall, the impact of the EU ban of Mexican horse meat and the general decrease in demand for the meat were clearly visible. During previous visits to the Presidio export facilities, at least five U.S. trucks per day were observed delivering horses and between four and six loads of horses were exported to Mexico. During the recent three-day investigation, only one U.S. truck was observed delivering horses and not a single Mexican truck arrived to export horses to Mexico.







Bleeding leg injury obtained during struggle



Horse being trampled inside trailer



Crowded compartment

6. Investigative Findings: Transport

Among the biggest welfare concerns linked to the horse slaughter industry is the transport of these animals from the auction to the feedlot and then later to the plant. Slaughter horses are transported in 53-foot-long, aluminum, single deck cattle trailers that can hold up to 40 horses in three compartments.

Horses, not familiar with each other and of all different sizes and genders, are put together in these compartments, which often results in kicking, biting, and fighting. Horses often lose their footing due to slippery flooring or careless driving and when they fall, they are at a high risk of being trampled to death by the other horses.

Recent example: Dennis Chavez Slaughter Horse Transport, New Mexico

On Dec. 6, 2022, investigators followed a slaughter horse transport that was leaving the Chavez feedlot. When the truck, which was heading to the Mexican border, stopped to fuel investigators were able to look inside the trailer. They noticed that a horse in the back

compartment was down and being trampled by the other horses. They alerted the driver, who was able to get the horse back up by poking it with a stick. However, the horse appeared very weak and unstable, and the truck should have returned to the feedlot. Instead, the driver chose to continue his trip to the border. Animals' Angels has reported the incident to USDA Investigative Enforcement Services and an official investigation was launched. The case is ongoing.

Slaughter horses can legally be transported for 28 hours without food, water or a chance to rest. Especially in the hot summer months, when temperatures inside the aluminum trailer can exceed 100 degrees Fahrenheit, dehydration can contribute to horses going down inside the trailer and becoming non-ambulatory. U.S. horses exported to Mexico are especially at risk since they are often transported in open roof trailers that offer no protection from the elements.





U.S. horses in Mexican open-roof trailer

Federal regulations aiming to protect the welfare of slaughter horses do exist. However, enforcement of the Commercial Transport of Equines to Slaughter Regulation is virtually nonexistent due to lack of funding for the U.S. Department of Agriculture's Equine Slaughter Horse Protection Program.

For example, public records obtained from the Texas Department of Agriculture's export pen in Socorro show that almost every shipment was in violation of the regulation. Of the 73 total shipments that left the pen in 2021, 19 were rejected by Mexican authorities for stallions mixed in with geldings and mares, 39 for horses with infected wounds and 15 for incorrect information (wrong sex; wrong microchip; incorrect health certificate).

It is also important to point out that as soon as a U.S. slaughter horse transport crosses into Canada or Mexico, the trailer is sealed by border officials and cannot be opened until the trailer arrives at the slaughter plant—which means that there is no help for a horse becoming non-ambulatory in transit.

However, these transports are not only putting the horses inside the trailers at risk, but they are also a hazard on America's roadways. Investigations and public documents from the Federal Motor Carrier Safety Authority show that many of these long-distance transports are carried out by a solo driver. Lengthy transports cause drivers to go well over the legally allowed 11 hours of driving time and as the driver becomes more exhausted, his quality of driving decreases. Animals' Angels, Animal Wellness Action and the Center for a Humane Economy have documented trucks engaging in erratic, non-linear driving, speeding through red lights, and exhibiting other reckless driving practices.

Horses covered in snow in outdoor pen area **Examples of repeat offenders (Source: FMCSA)**

NAME	DOT	VIOLATION NO.	VIOLATION TYPE
Stanley Brothers	2388513	Drivers record of duty not current	Drivers record of duty not current
Dakota Rodeo	1438444	395.8F01	Drivers record of duty not current
Bruce Rotz	1680857	395.8A-NON-ELD	No record of duty status
Brian Moore	1404399	395.8A-NON-ELD	No record of duty status
Vanee Livestock	14138	395.8	Record of duty status violation

7. Investigative Findings: Slaughter Plants

7.1 Bouvry Exports, Fort Macleod, Alberta, Canada

Background information:

Bouvry Exports Ltd. horse slaughter plant in Alberta is the largest remaining horse slaughter plant in Canada. The plant is surrounded by several company-owned feedlots that provide a steady supply of horses to the plant. Horses acquired in the United States are kept inside the feedlots for six months before being slaughtered to comply with EU drug residue requirements.

The slaughter plant holding pens have no protection from the harsh environment and no access to shelter. Past investigations have shown dead foals, frozen to the ground, inside the pen. The skeletal remains of two other horses were found just outside the pen area. Injured and sick horses and horses with severely overgrown hooves were also documented.



Horses covered in snow in outdoor pen area



Dead foal frozen to the ground

Information received via Freedom of Information Act request:

The public records obtained from the Canadian Food Inspection Agency included many horrifying accounts of Bouvry Exports' disregard for following food safety regulations or ensuring the humane treatment of animals.

The paperwork, photos, and videos provide evidence of the carelessness and ruthlessness of Bouvry Exports Ltd. Management comprised of people who are apparently fully aware of the operation's animal welfare issues, but who are choosing to willfully ignore them.

Examples:

- A report from Oct. 6, 2020, documented an extremely thin blue roan gelding (BCS1) arriving at the plant dehydrated, with labored breathing. The poor animal collapsed in the alley after a few feet and was unable to rise again. The same load included a sorrel gelding whose right hind leg was completely lame. A postmortem inspection found an abscess with multiple pockets of yellowish, foul-smelling pus.
- A report from Jan. 7, 2021, documented that a mare was down in the trailer at arrival at the plant. The plant employees proceeded to tie a rope around her neck and drag her all the way

through the 53-foot- trailer. The mare was then lifted into a pen using a forklift, where she suffered for the next eight hours until she was finally euthanized.

- On Jan. 21, 2021, a bay mare with back tag #9109 and a deep laceration on her right front foot was found inside a trailer. Alberta border officials refused entry into Canada and the trailer, which was destined for Bouvry Exports Ltd., had to turn around.
- On Jan. 26, 2021, another load of slaughter horses was refused entry into Canada at the Alberta border crossing, a sorrel gelding with back tag #9130 was completely lame.
- On Feb. 18, 2021, a sorrel gelding with back tag # 9378 was found inside a trailer destined for Bouvry Exports Ltd. with a severe laceration on the nose bridge. The transport was denied entry into Canada.
- On March 8, 2021, a foundered bay filly with severely overgrown hooves (7 to 11 inches long on all four feet) was delivered to the plant. The animal was not segregated and put in a pen together with other horses. On March 17, an employee noticed the filly and described that its legs were "splayed and trembling during standing and walking", and that the animal was "constantly wobbling its head and not able to drink water." Nine days after arrival at the plant the suffering animal was slaughtered.

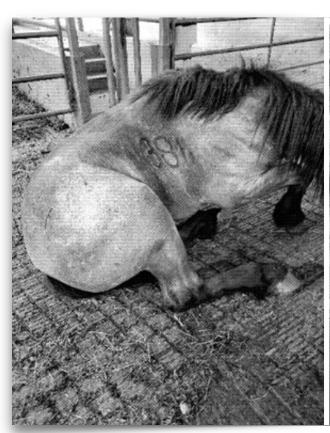
Additional statements by Bouvry Export Ltd. employees regarding this incident include:

- "We used to take every horse, like the ones with broken legs and they would be down in the trailer and...they would just drag them off and slaughter them."
- "We have been dealing with this kind of crap for years...You couldn't say that we haven't been warned."
- "The bay filly came from the U.S...and already likely had been foundered and had long feet....their condition gets worse as they get heavier."



 On March 19, 2021, CFIA inspectors at the plant noticed several incidents of crosscontamination between EU eligible and non-eligible carcasses.

- On April 16, 2021, CFIA inspectors noted poor sanitary conditions on the slaughter floor and inside the offal room. A foul smell was coming from the bleeding area. Blood was pooling and the hide belt and offal belt were contaminated with wet blood and hair.
- A report from April 21, 2021, documented a CFIA inspector's observation of a Bouvry Export employee attempting to shoot a horse in the kill box five times with a .22 rifle. The inspector stopped the procedure after determining there was no captive bolt available on the kill floor. The inspector was also informed that the gun they routinely used "blew up in their hands" the week before and had been sent in for repair and thus they were using a .22 long rifle instead of the allowed .22 magnum rifle.
- A report for April 22, 2021, documented that four horses were found with two bullet holes in their heads due to continued use of the wrong rifle.
- July 16, 2021, CFIA inspectors noted that several Equine Identification Documents (EIDs)
 contained incorrect information and list medicine that is not allowed to be administered in
 horses destined for human consumption. The inspectors found the operator's preventative
 control program and implementation not effective to control the hazards.
- A report for July 20, 2021, documented the delivery of five significantly lame horses to the plant. The driver is quoted calling the horses "cripples & canners." A lethargic grey horse with drastically overgrown hooves and a hind club foot, who was exhausted and unable to move, was trapped under the fence at the plant and euthanized. A bay horse, who was unable to put weight on his right hind leg, collapsed in the alleyway to slaughter and was euthanized on the spot. No Equine Identification Documents (EIDs) were obtained from the person who had possession, care or control of the horses prior to arrival at the plant.





 On Feb. 17, 2022, the Canadian Food Inspection Agency temporarily suspended Bouvry Exports license for failure to comply sections 49 and 50(2) of the Safe Food for Canadians Regulations. The CFIA determined that the control measures to detect E. coli and the temperature deviation of carcasses was inadequate.

7.2 Viande Richelieu, Massueville, Quebec, Canada

The Viande Richelieu horse slaughter plant is the only plant located in Eastern Canada. Besides Canadian horses, the plant slaughters U.S. horses delivered from Pennsylvania, Michigan, Minnesota, Indiana and Ohio.

Information received via Freedom of Information Act request reveals that there were multiple incidents in 2020/2021 of horses from the United States arriving dead or non-ambulatory.

In the case that the animal is already down inside the trailer and is detected by border officials at the Canadian border crossing, its fate is especially dire—instead of providing immediate euthanasia for the suffering animal, the transport is refused entry into Canada and the truck has to turn around. A procedure that often adds long hours of agony for the downer and also puts any surrounding horses in the same compartment in great danger.



The Viande Richelieu horse slaughter plant

Examples:

Jan. 15, 2020, Horse #9394 is euthanized inside the trailer upon arrival at the plant.

- Feb. 14, 2020, Horse #5950 died inside the pen area after being unloaded.
- Feb. 25, 2020, Border officials find two non-ambulatory horses inside the trailer. The truck is refused entry and returned to the United States.
- May 22, 2020, Border officials find a non-ambulatory horse in the front compartment of the trailer. There are three other horses in the same compartment. Truck is refused entry and returned to the United States.
- July 30, 2020, Horse #0625 is dead upon arrival inside trailer. According to the paperwork, the transport time was 25 hours.
- Aug. 11, 2020, Border officials find non-ambulatory horse in the front compartment. Trailer is refused entry and returned to the United States.
- Dec. 11, 2020, Horse #1590 died in pen area after being unloaded.
- Jan. 8, 2021, Horse #1765 is euthanized upon arrival at the plant.
- Feb. 10, 2021, Horse #1962, a 19-year-old chestnut Quarter horse gelding, is down and non-ambulatory inside the trailer. Horse #1951, a 14-year-old Quarter horse mare, is dead inside the trailer. Truck is refused entry at the Ontario border crossing and returned to the United States.
- March 25, 2021, Horse #2119 is euthanized upon arrival at the plant.
- April 15, 2021, Horse #2204 is euthanized upon arrival at the plant.
- May 14, 2021, Horse #2322 is dead upon arrival.
- June 3, 2021, Horse (no tag information provided) is non-ambulatory inside the trailer at the Ontario border crossing. The truck is refused entry and returned to the United States.
- Sept. 13, 2021, Horse (no tag number provided) is dead upon arrival.

8. Conclusion

The investigation of the locations mentioned in this report shows very clearly that every aspect of the horse slaughter pipeline is interwoven with inhumane and often cruel treatment. Animal protection laws are either nonexistent, so weak to be meaningless, or are completely ignored and not enforced, resulting in a deregulated trade in horses for slaughter.

Public documents reveal that the systems put in place to ensure traceability of the horses slaughtered are not reliable, creating severe food safety concerns. It is also important to point out that these traceability concerns are not new—in Mexico's case, they led to the 2014 EU import ban of all horse meat produced in Mexico.

Canada's horse slaughter industry has received multiple warnings from importing countries. In 2018, an official audit conducted by EU officials in Canada found that "Information contained in several of the Equine Identification Documents (EIDs) appeared incomplete and unreliable, which affects the reliability of the guarantees provided by the Competent Authority that horses slaughtered in Canada for export to the EU have not been treated with banned substances before slaughter or that the withdrawal periods of veterinary products had been respected."

The fact that in 2023 there are still incidents of false, missing, or incomplete EIDs shows that the system is simply not fixable, and that food safety ultimately cannot be guaranteed. There are ongoing food safety issues for foreign consumers arising from toxic drugs given to American horses.

Other concerns such as the safety of U.S. roadways warrant action from policymakers. A complete ban of horse slaughter on American soil and of the export of American horses for slaughter is long overdue and the only responsible response to the numerous areas of concern linked to this industry.

For years, groups advocating for horse slaughter, namely veterinary groups, breed organizations, some native tribes, and meat industry interests, continue to characterize slaughter in foreign slaughter plants as "humane euthanasia" and a responsible means of disposing of unwanted horses. The numbers invalidate this concern, given that just more than 3% of horses who die on average per year are killed at horse slaughter plants. Horse owners, sanctuaries, government agents, and others are making more responsible end-of-life decisions for horses. Personal responsibility has always been a fundamental premise of animal care.

Efforts to pass differing versions of a federal horse slaughter ban have stalled in Congress since the closure of domestic slaughter plants. That said, it's clear that a majority of lawmakers in the U.S. House and U.S. Senate support a ban on horse slaughter. That was in evidence with an Animal Wellness Action-sponsored amendment in 2021 that was attached to a larger infrastructure bill that had virtually no opposition in the Congress.

Congressional action is needed because USDA oversight has proved entirely delinquent and insufficient. Despite USDA rules designed to prevent the transport of horses that are injured, blind, or sick, the report details numerous instances of suffering animals being loaded. Conditions at other junctures in their passage to slaughter also produce cruelty and mistreatment.

The vast majority of American horse owners choose to have their animals euthanized by their veterinarian when the animal is old, sick, or lame; it is only a small segment of the horse owning population that use sale for slaughter to dispose of their animals. This matches what we know about the fate of dogs and cats in the United States; most pet owners choose humane euthanasia when their animal's suffering cannot be alleviated or find another suitable home when they can no longer provide responsible care, yet there is a small subset of pet

owners who surrender their animals to shelters or abandon them. As a matter of policy, we don't enable live dog exports to accommodate this reckless minority of dog owners. In fact, in the Agricultural Improvement Act of 2018, Congress adopted national legislation to ban the sale of dogs or cats for human consumption.

As the number of equines exported for slaughter continues to decline, we expect most of the animals in the slaughter pipeline will originate from a smaller and smaller subset of suppliers, especially the harness racing industry in the eastern U.S; the Amish and Mennonite, who are a major source of slaughter horses in the Midwest and East, and a small group of western tribes, especially the Yakama of Washington, the Warm Springs of Oregon, and the Navajo of the Southwest. These groups may continue to claim an entitlement to sell horses for slaughter, despite overwhelming public opposition to the industry.

Another factor that has come to bear is the unprecedented number of formerly wild horses and burros gathered by the Bureau of Land Management being offered for slaughter by unscrupulous individuals availing themselves of the BLM's Adoption Incentive Program, which offers adopters \$1,000 apiece to adopt up to four animals per individual. Despite public and media scrutiny and assurances by the BLM to reform the AIP, the numbers continue to grow in gather points across the country. Those who track and monitor the situation report that the BLM adopts horses to individuals known to sell animals directly to slaughter. As the agency aggressively removes wild equines from their designated Herd Management Areas and incentivize adoption by profiteers, we can expect BLM equines to make up a growing segment of animals sent to slaughter.

The details of slaughter have changed dramatically over the last quarter century. This is an industry in decline, with a record of terrible animal care. Congressional action to ban live exports is warranted based on a careful investigation of the details of slaughter and the scale at which it operates.

9. Organizational Biographies

Animal Wellness Action is a Washington, D.C.-based 501(c)(4) whose mission is to help animals by promoting laws and regulations at federal, state and local levels that forbid cruelty. The group champions causes that alleviate the suffering of companion animals, farm animals, and wildlife, and it advocates against dogfighting and cockfighting and other forms of malicious cruelty. It also confronts factory farming and other systemic forms of animal exploitation. To prevent cruelty, Animal Wellness Action promotes enacting good public policies and monitors the enforcement of those in place. To enact good laws, the group believes citizens must elect good lawmakers, and it helps educate voters on which candidates care about animal issues as well as those who are hostile to them. Animal Wellness Action believes helping animals helps us all.

Center for a Humane Economy is a Washington, D.C.-based 501(c)(3) whose mission is to help animals by helping forge a more humane economic order. The first organization of its kind in the animal protection movement, the Center encourages businesses to honor their social responsibilities in a culture where consumers, investors, and other key stakeholders abhor cruelty and the degradation of the environment and embrace innovation as a means of eliminating both. The Center believes helping animals helps us all.

Animals' Angels is a non-profit organization that carries out undercover investigations in the United States, Canada and Mexico to document the way animals are treated at auctions, feedlots and slaughter plants. Its focus is on raising awareness about the cruelty animals in commercial operations face every single day and on holding those responsible accountable for their actions.