

September 19, 2022

The Honorable Janice Schakowsky
Chair
Subcomm on Consumer Protection & Commerce
Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Gus Bilirakis
Ranking Member
Subcomm on Consumer Protection & Commerce
Committee on Energy and Commerce
2322 Rayburn House Office Building
Washington, DC 20515

The Honorable Frank Pallone
Chair
Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Cathy McMorris Rodgers
Ranking Member
Committee on Energy and Commerce
2322 Rayburn House Office Building
Washington, DC 20515

Dear Chairs Schakowsky and Pallone, and Ranking Members Bilirakis and McMorris Rodgers,

We write in support of HR 3355, the Save America's Forgotten Equines Act (the SAFE Act of 2022).

As veterinarians, we swear an oath to “benefit society through the protection of animal health and welfare, and the prevention and relief of animal suffering.”¹ For this reason, we support all efforts to permanently ban horse slaughter in the U.S. and end the export of American horses for slaughter abroad.

Congress effectively blocks horse slaughter inside the U.S. each year. However, the commercial transport of American horses to slaughter across the U.S. border continues, and Congress should act now to stop it.

First, it is far from humane. The “slaughter pipeline” that brings horses to slaughterhouses, or abattoirs, in Canada or Mexico often starts after an auction, where horses come from racetracks, family farms, backyards, lesson programs, horse shows, and so on. They arrive in “kill pens” from all over the country, and then often travel up to 28 hours with no food, water, or rest enroute to the border. Crammed into trailers with unfamiliar animals, horses endure grueling journeys that often result in horrific injuries or death. Peer reviewed studies have documented that it causes significant health and welfare issues.

¹ <https://avma.org/resources-tools/avma-policies/veterinarians-oath>

- In one study, over 40% of horses had poor or very poor welfare indicators on arrival at the slaughter facility (abattoir).²
- Another study published in the journal *Meat Science* found “that carcass bruising was a highly prevalent problem (79% of carcasses had bruising)” in American horses slaughtered in Mexico. Furthermore, 20% of all carcasses had a “severe and concentrated damage pattern” related to biting and kicking from unfamiliar horses being loaded together.³

When such facilities were operating in the U.S., the USDA documented horses arriving at the slaughterhouse with dislodged eyeballs, detached limbs, and downed horses who had been trampled to death.⁴

The cruelty of this industry continues when they arrive at the slaughterhouse. Humane slaughter, by definition, requires that an animal be rendered unconscious prior to being dismembered. This standard is virtually impossible to meet with equines, especially in a commercial slaughterhouse. Horses are extremely difficult to immobilize and render insensible to pain, especially when using equipment designed for other species. In the stunning box, horses’ heads are unrestrained and may flail and flinch in a manner inconsistent with humane slaughter. Inevitably, the captive bolt will miss its target multiple times, sending the injured equine into a panic, and potentially to dismemberment while alive and conscious. The 2014 audit of EU-approved slaughter plants in Mexico documented persistent and extremely serious welfare concerns during transport and at the slaughter facilities.⁵ Inspectors noted that at multiple facilities, handlers did not even bother to confirm that an animal had been effectively stunned before being hoisted for dismemberment.

Second, commercial slaughter is not euthanasia. The ASPCA supports humane euthanasia for horses when quality of life is untenable. The word “euthanasia” literally means a good death. When we think of euthanasia, we imagine old, sick, or injured animals needing a peaceful and dignified end of life in the hands of a professional. The slaughter pipeline from start to finish is the opposite way to end a life. Loading an already-suffering horse into a transport vehicle and shipping the horse for up to 28 hours with no food, rest, or room to move to a slaughterhouse can in no way be characterized as euthanasia.

² Genaro C Miranda-de la Lama, Cesar A Gonzalez Castro, Francisco J Gutierrez-Pina et al. Welfare of horses from Mexico and the United States of America transported for slaughter in Mexico: Fitness profiles for transport and pre-slaughter logistics. Preventative Veterinary Medicine Vol 180 July 2020.

³ Genaro C. Miranda-de la Lama a,d,*, C´esar A. Gonz´alez-Castro b, Francisco J. Guti´errez-Pi˜na b, Morris Villarroel c, Gustavo A. Maria a, Laura X. Est´eveez-Moreno, “Horse welfare at slaughter: A novel approach to analyse bruised carcasses based on severity, damage patterns and their association with pre-slaughter risk factors” *Meat Science* 10/13/20.

⁴ U.S. Department of Agriculture. 2005, FOIA Request #06-108.

⁵ European Commission Food and Veterinary Office “Final Report of an Audit Carried Out in Mexico from 24 June to 04 July 2014”: http://ec.europa.eu/food/fvo/rep_details_2_en.cfm?rep_id=3364.

Slaughterhouses are designed for food production – they are not designed to be sites of humane euthanasia. Dr. Nicholas Dodman, in his 2008 testimony before the House Judiciary Committee on behalf of Veterinarians for Equine Welfare, stated, “No ethical veterinarian, faced with a client who has a horse that is old, sick, or otherwise no longer wanted, would suggest that the horse in question should be put on a truck and hauled thousands of miles to slaughter. Instead, the veterinarian would most likely suggest truly humane euthanasia via chemical injection.”⁶

Perhaps more important, the horses being sent to slaughter are most often not in need of euthanasia, and the horses in need of euthanasia are often not the horses sent to slaughter. The USDA’s own data showed that when horse slaughter plants were operating in the U.S., 92.3% of horses at those facilities were in good condition.⁷ As noted previously, “kill buyers” profit from robust, large animals, which mean they avoid or offload equines with poor body condition.

Third, since American horses are not raised for human consumption, they are routinely given controlled substances that make their meat a threat to human health.

- An article published in the *Food and Chemical Toxicology Journal* estimated that 9,000 pounds of meat taken from horses with known exposure to phenylbutazone were sent abroad for human consumption over the five-year study period – the entire sample they were observing.⁸
- Another study looking at the prevalence of comingled horsemeat in beef products in Mexico found that of the approximately 10% of samples that contained equine tissue, a disturbing figure in itself, all of them contained clenbuterol – a drug banned for use on animals meant for human consumption.⁹
- In 2017, in light of an FVO audit of Canadian horse slaughter facilities, the European Commission implemented new regulations requiring that all American horses destined for slaughter in Canada be held for six months prior to slaughter if their meat was destined for EU member countries. While the intent is to control banned substances, many of these substances are banned in *any concentration and for use on food animals at any point in their lives*.

Until the SAFE Act becomes law, these horrors will continue for American horses.

⁶ House Judiciary Committee hearing transcript, 7/31/08, p. 65 – <https://www.govinfo.gov/content/pkg/CHRG-110hhrg43830/pdf/CHRG-110hhrg43830.pdf>

⁷ Grandin, Temple, Survey of Trucking Practices and Injury to Slaughter Horses.

⁸ Dodman, Blondeau, & Morini. 2010. “Association of phenylbutazone with horses bought for slaughter: A public health risk” *Food and Chemical Toxicology*. (48)5. <https://www.sciencedirect.com/science/article/pii/S0278691510001225>;

⁹ Lozano, et al. 2020 “Horse meat sold as beef and consequent clenbuterol residues in the unregulated Mexican marketplace” *Food Control*. 1:10. <https://www.sciencedirect.com/science/article/abs/pii/S0956713519306176>.

The SAFE Act of 2022 was written with the support of veterinarians and the concerned public to protect animal welfare and prevent suffering, especially during the transportation of horses to abattoirs outside the United States.

The American Veterinary Medical Association (AVMA) has stated that it does not support HR 3355 and agrees with the American Association of Equine Practitioners' (AAEP) policy on the subject. The position statement that is cited by the AVMA in Dr. Donlin's letter is based on a statement made at a board meeting of the AAEP in May 2002.¹⁰ However, on June 27, 2011, Dr. William Moyer, President of the AAEP, updated this policy in the AAEP statement in response to the Government Accountability Office (GAO) Report on Horse Welfare.¹¹ He stated in part, **"The AAEP believes that horse processing is not the ideal solution for addressing the large number of unwanted horses in the U.S."** This position is more current than that supported by AVMA and demonstrates the shift in the veterinary position on horse processing that has occurred over the past 20 years.

Dr. Donlin provided three counterpoints to HR 3355, but these statements are also out of date and inconsistent with current peer reviewed research. Although Dr. Donlin states that the AVMA "...provides its members a forum for discussion of issues of importance to the veterinary profession and for the development of official positions in related areas," this topic for discussion was last hosted by the AAEP, not the AVMA, at the Unwanted Horse Summit on April 19, 2005.¹² That was seventeen years ago. Consequently, the three issues that she argues are not adequately addressed by HR 3355 are considered outdated and no longer accurate. Specifically:

1. "HR 3355 does not address the **welfare** of horses no longer being slaughtered that end up in rescue and retirement facilities."

AAEP has addressed this concern by publishing "Care Guidelines for Equine Rescue and Retirement Facilities" (current version updated in 2019).¹³ These guidelines were developed by the AAEP Welfare and Public Policy Advisory Council with the input of several expert equine veterinarians. This document "provides guidance about the care of a horse throughout its life" and specifically unwanted horses that "may arrive with unique health challenges." It provides equine rescue and retirement facilities with a valuable resource to guide them on everything from hoof care and nutrition to euthanasia. In regards specifically to the welfare of horses in these facilities, the final chapter is titled:

¹⁰ <https://bloodhorse.com/horse-racing/articles/178951/groups-that-oppose-slaughter-ban-target-of-letter>

¹¹ <https://aaep.org/news/aaep-statement-regarding-gao-report-horse-welfare>

¹² <https://avma.org/javma-news/2005-07-01/summit-charts-historic-course-unwanted-horses>

¹³ https://aaep.org/sites/default/files/2021-03/AAEP_Rescue_Retirement_Guidelines

“The Bottom Line- Protecting the Health and Welfare of the Horse” and states that the most important factor is the “physical and emotional health of the horses.”

2. “H.R. 3355 does not address the **financial support** required for unwanted horses that cannot be slaughtered.”

In 2008, AAEP and Merck Animal Health co-founded the Unwanted Horse Veterinary Relief Campaign to “provide healthcare assistance to the overburdened equine rescue and retirement facilities that rehabilitate, revitalize and ultimately rehome America’s unwanted horses.”⁸ Veterinary care for these horses is essential, and this starts with routine vaccines that prevent diseases such as rabies, tetanus, and West Nile. Under this assistance program, equine rescue and retirement facilities can apply to receive complementary equine vaccines “protecting the horses’ health and making them more adoptable.”¹⁴ The last reported figures, over 10 years after its inception, are that over 30,000 free equine core vaccines have been provided to rescue and retirement facilities.¹⁵ Thus, equine veterinarians and the equine pharmaceutical industry is committed to reducing the cost of veterinary care to horses in rescue and retirement facilities.

3. “**Environmental concerns** related to horse carcass disposal.”

Approximately 380,000 horses die annually in this country (10 percent of an estimated population of 3.8 million as of 2020¹⁶) and the vast majority are not slaughtered but euthanized and rendered or buried without any negative environmental impact. Approximately 23,000 horses were transported for slaughter from the U.S. in 2021¹⁷. If export for slaughter was no longer an option and these horses were rendered or buried instead, this would represent a negligible change in the number of horses being disposed of in this manner – something current U.S. infrastructure is well-equipped to handle. Nevertheless, reopening slaughterhouses in America is not the answer to ending this form of cruelty. In fact, even when horse slaughter facilities operated in the United States, tens of thousands of American horses were still exported to other countries for slaughter¹⁸.

¹⁴ <https://aaep.org/horse-owners/unwanted-horse-veterinary-relief-campaign>

¹⁵ <https://merck-animal-health-equine.com/programs/vet/uhvrc>

¹⁶ <https://fda.gov/animal-veterinary/cvm-updates/fda-revises-population-estimates-cats-and-horses-determination-minor-uses-major-species>

¹⁷ <https://www.asPCA.org/improving-laws-animals/public-policy/horse-slaughter>

¹⁸ <https://www.asPCA.org/improving-laws-animals/public-policy/horse-slaughter>

These innovations, along with the Unwanted Horse Summit and the creation of the United Horse Coalition, the Unwanted Horse Coalition, the Homes for Horses Coalition, as well as the more than 500 horse rescue organizations across the country¹⁹, and the fact that roughly 2.3 million households want to adopt a horse,²⁰ we have made giant strides to end the need for international horse transport for slaughter.

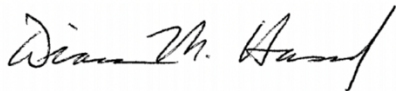
These continued efforts to improve the welfare of horses throughout the United States is what passing HR 3355 will continue to support.

Thank you for your consideration and important work on this issue.

Sincerely,



Vanessa Cook, VetMB, PhD
Diplomat American College of Veterinary Surgeons
Diplomat American College of Veterinary Emergency and Critical Care
Board member, Believe Ranch and Rescue



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Diplomat American College of Veterinary Surgeons
Diplomat American College of Veterinary Emergency and Critical Care
Professor, Colorado State University

¹⁹ <https://horsecounsel.com/horse-rescues-shelters-us/>

²⁰ <https://www.aspcapro.org/research/encouraging-research-regarding-homes-horses>; actual research report: <https://www.mdpi.com/2076-2615/7/7/53>