The Canadian Horse Defence Coalition

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CFIA and the Art of Evasion

For the fourth time since 2008, the CFIA (Canadian Food Inspection Agency) has left the CHDC and our supporters wondering what it could possibly take to free the agency of its dependency on evasion tactics and resulting poor performance in the areas of animal welfare and food safety. *Yes, even food safety - the very reason the CFIA exists.*

We can speculate that perhaps the recent government cutbacks directed at the CFIA may have something to do with the clear sense of apathy within the agency. While this is an excuse worth considering, one has to remember that the problem has been ongoing for longer than just the recent past. And why should any excuses from a taxpayer-funded government agency be acceptable?

The plot thickens when the public and opposition Members of Parliament attempt to obtain answers to their questions from government. With amazing dexterity, reigning politicians and agency supervisors beat around the bush, ignore point-blank queries, baffle with balderdash and, if all else fails, resort to undermining the opposition.

The CHDC has witnessed first-hand how Order Paper questions have become a tossed salad of government manipulation: **(Order Paper)**. Agriculture Committee meeting queries have similarly been met with a healthy round of head games rather than direct answers: http://www.parl.gc.ca/HousePublications/Publication.aspx?DocId=5448675&Language=E&Mode=1&Parl=41&Ses=1 (March 12/12 Standing Committee on Agriculture and Agri-Food meeting).

In recent years, undercover investigations were conducted on four separate equine slaughterhouses, with videotape anonymously turned over each time to CHDC for assessment and dissemination. The most recent investigation occurred at Les Viandes de la Petite-Nation in St-André Avellin, Quebec in July 2011, titled “Pasture to Plate”.

On January 5, 2012, Sinikka Crosland of the CHDC wrote to several CFIA officials as a follow up to the December 2011 release of Pasture to Plate: http://canadianhorsedefencecoalition.wordpress.com/2012/01/05/open-letter-to-the-cfia-canadian-food-inspection-agency/. On January 9th, Dr. Brian Evans responded, saying a follow up response was forthcoming: http://canadianhorsedefencecoalition.wordpress.com/2012/02/16/winter-2012-update/

The CHDC continued its follow up with the CFIA on March 13th with an open letter including a full video package from Pasture to Plate, which the CFIA had never requested: http://canadianhorsedefencecoalition.files.wordpress.com/2012/03/cfia-appelt-letter-13-mar-12.pdf. On April 20th, Dr. Brian Evans responded again, saying the CFIA will respond upon further review, at a later date.

Letter from the CFIA's Chief Veterinary Officer, Dr. Brian Evans, and the CHDC's Responses to His Claims

For a real eye-opener, view the letter **(Evans Letter)** dated February 20, 2012, from Dr. Brian Evans, Chief Veterinary Officer and Chief Food Safety Officer for the CFIA. Numerous glaring discrepancies punctuate this letter, and we would like to highlight the excerpts below in particular, with CHDC responses following the statements made by Dr. Evans:

***Dr. Evans*:** "To suggest that the CFIA has not taken action in the past when concern was raised is not supported by the facts."

***CHDC*:** "In truth we are concerned about one very real fact - that after three previous equine slaughterhouse investigations, yet a fourth plant showed major flaws. Why were the problems not addressed in all of the slaughterhouses after the very first investigation results were revealed? Or after the second and third investigations?

"The root problem is that horses are 'flight' animals and cannot be humanely slaughtered in assembly-line situations. Not only should the CFIA have responded promptly to address inherent issues in all equine slaughterhouses (after cruelty at Natural Valley Farms was exposed in 2008: http://www.defendhorsescanada.org/natural-valley-farms-investigation.html) but they should have taken into consideration the nature of the horse and the fact that, when speed and profit are the goals, animal welfare always suffers.

"All flight animals wish to flee from their tormentors, and horses in particular are extremely difficult to restrain when danger lurks. Even after three previous horse slaughterhouse investigations had taken place, a fourth plant, Les Viandes de la Petite-Nation, was permitted to use a stun box with a slanted, slippery floor and no method of restraining a frightened horse's head.

"However, as slaughter plant operators well know, the very nature of horses will cause them to panic under severe restraint in terrifying situations - to the point that the animals may break their necks while struggling to get away. This is why stanchion restraints are not used in equine slaughterhouses. Instead, the method they have resorted to is the highly ineffective practice of attempting to stun a moving target, the unrestrained head of a non-compliant victim.

"At Les Viandes de la Petite-Nation, horses in the stun box were able to part a curtain at the far end and view the slaughtering area while they awaited their turn. Dr. Evans states that 'a number of actions have been taken, including training and certification delivered, construction standards changed, operations suspended in response to corrective actions required and operating licences revoked where a company was not able to demonstrate its ability to consistently meet its regulatory obligations'.

"But why did it take the airing of undercover footage before these changes began to happen? The public should not be required to babysit the CFIA and make sure that the regulatory agency does its job.

"Furthermore, the CFIA is now permitting the use of a .22 rifle instead of a captive bolt pistol at Les Viandes de la Petite-Nation. After the airing of horrific footage of stunning

practices by rifle at Bouvry Exports and Viandes Richelieu (2010 investigative report 'Chambers of Carnage': http://www.defendhorsescanada.org/chambers-of-carnage.html), why is the agency recommending a method rife with animal abuse? Has anything at all been learned from past experience, or is profit alone the name of the game, with good animal welfare principles being once again compromised. Dr. Temple Grandin, in an April 2012 document: http://www.grandin.com/humane/questions.answers.horse.slaughter.html stresses that a measurement of welfare indicators include 'one shot from either a captive bolt or a firearm'. Note that she indicates 'one shot', not several or numerous shots.
"Past investigations have unmistakably demonstrated that no matter what the method, horses often do not succumb on the first or second stunning attempt. Without *restraint of the head*, gunfire is a haphazard effort at best. But, again, the catch-22 situation is this: restraint of a horse's head cannot be done without causing the animal to panic and thrash.

"The only acceptable answer would be for the government to acknowledge that horses are impossible to humanely slaughter in assembly-line situations, and to abolish the industry in Canada.

"Additional points include the following:

- A 2010 CBC report, 'Horses Mistreated': http://www.cbc.ca/thenational/indepthanalysis/story/2009/10/01/national-horses-061008.html revealed that when the .22 rifle was used to stun horses in Canadian slaughterhouses, for safety reasons no one was permitted to be present to monitor the stunning other than the shooter. According to the 2010 CBC investigation and testimony of Bob Kingston, Agricultural Union President, no oversight of stunning practices had occurred at Viandes Richelieu or Bouvry Exports for three years, due to the CFIA ruling, and barriers (to allow monitoring) were installed only after CHDC had released undercover footage taken at the slaughter plants. Yet Dr. Brian Evans' on-camera statements indicated that the barriers had been in place since 2007.

- When horses are standing in the knock box, their heads are higher than the shooter who stands on the ground and has to reach up to stun or shoot the horses. This upwards angle is contrary to the recommended downward trajectory needed to properly ensure a correct shot: http://www.omafra.gov.on.ca/english/livestock/horses/facts/info_euthanasia.htm "

***Dr. Evans*:** "There are significant limitations to the use of video footage in the absence of eye witness testimony as the basis for enforcement or prosecution purposes."

***CHDC*:** "We would like the CFIA to stop coming up with excuses. Video is what it is – a real account of events captured on film, while eye-witness testimonies have often been found to be flawed due to human error or bias. The public can view the stun footage accessible from our home page: http://www.defendhorsescanada.org captured at Les Viandes de la Petite-Nation in July 2011, and decide for themselves whether an eye-witness statement would have been more accurate than real-time footage. It is truly appalling that the CFIA has chosen to trivialize evidence and to shirk its responsibilities

toward suffering animals and the general public that relies on the agency to be transparent and tell the truth."

***Dr. Evans*:** "This [the inability of the recently released undercover video footage to be used for regulatory enforcement purposes] can be further compounded when there is a significant time lag between the shooting of the video and its presentation to the CFIA and when the video has been edited."

***CHDC*:** "The time lag of less than five months occurred because it was our duty to perform our due diligence, unlike the CFIA, and have the evidence thoroughly assessed by independent animal welfare professionals before handing it over to an agency that has proven itself beholden to industry. We have learned this from the three prior horse slaughterhouse cruelty cases we brought forward since 2008.

"Truly the CFIA has become the fox that guards the henhouse. The mandate of the CFIA is to ensure food safety. The mandate of those involved in animal protection is exactly that - to safeguard the well being of animals. The CFIA's poor track record in the past concerning slaughterhouse investigations did nothing to assure us that this most recent slaughterhouse footage would be handled fairly.

"As expected, the agency has once again demonstrated, via a continuing stream of shockingly poor and groundless excuses, that animal welfare is not only not a concern for the agency but that it appears to be the agency's role to protect industry at all costs - especially those costs borne by the animals under its 'care'."

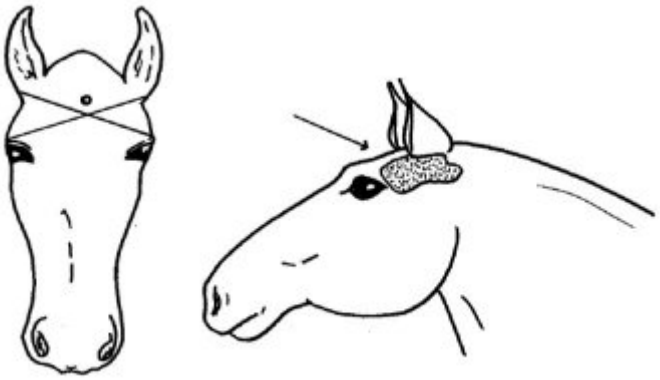
***Dr. Evans*:** "Recognized subject matter experts and international humane standards call for assessment of several critical features to affirm the effectiveness of the stun procedure that include the eye, the tongue, and the nose, which can only be determined from the front of the animal. As the video was taken from behind, it is not possible to conclusively use the video to make these assessments."

***CHDC*:** "Certainly it is true that a number of checkpoints on the head of an animal are used to determine whether stunning has been effective. However, whinnying, rearing, and mouthing (visible when horses moved their heads to one side) were often evident on the videotape and cannot be ignored. Also horses remained on their feet, not slumping down.

“The sheer numbers of re-stun attempts were further indicative of horses not rendered insensible after one shot, as was the shooter 'replying' to conscious horses' whinnying. Also, the shooter's statement, 'Aye, you're not dead', is clearly indicative of a still-conscious horse despite numerous stunning attempts. The shooter was clearly visible from the front, showing his repeated attempts with the captive bolt pistol. To deny the importance of these other parameters in determining sensibility is illogical and proves to the public that the CFIA is simply covering up cruelty.

"Many examples of images such as this one clearly illustrate what the CFIA doesn't want the public to see – **misplaced shots that cause immeasurable suffering**.

"In these two images from video footage captured at Les Viandes de la Petite-Nation, July 2011, it is apparent that there is lack of accuracy and consistency in captive bolt shots, which translates into animal suffering. The horse on the left has taken a shot much too high, while the horse on the right has been shot too low on the head. Also, the shooter is standing below the horses and reaching up, not shooting at the correct downward angle. The size of a horse's brain is quite small in comparison to the size of his/her head and accuracy of stunning has to be exact. To illustrate this, below are diagrams from the Ontario Ministry of Agriculture, Euthanasia of Horses:
http://www.omafra.gov.on.ca/english/livestock/horses/facts/info_euthanasia.htm



Yet the CFIA denies the importance of video taken from above and behind the animal."

***Dr. Evans*:** "With respect to the large Belgian that is seen to have received multiple stuns, while its state of consciousness is unclear, nevertheless this is one area of operations being assessed."

***CHDC*:** "The Belgian's state of consciousness was '*unclear*'? Dr. Nicholas Dodman, anaesthesiologist and animal behaviourist at Tufts University stated the following regarding the horse whose level of consciousness the CFIA is questioning: [After five shots] 'This large horse still appears to be conscious and is shot again in the forehead and even that doesn't do it as it heaves and tries to rise again. The large size of this horse plus imprecise CBG placement probably led to this totally unacceptable and inhumane result.'

"Dr. Dodman's expert opinion on slaughter practices at Les Viandes de la Petite-Nation concludes with: '.....my final conclusion, after reviewing 150-plus horse slaughters in this series of videos, is that the process was terrifying for most of the horses and, in many cases, horribly inhumane. The inhumane treatment of horses at Les Viandes de la Petite Nation must be stopped immediately.' "

***Dr. Evans*:** "The EU has accepted the EID as an alternative to its passport system because both systems achieve a similar outcome. EIDs are checked daily by CFIA veterinarians and filed by operators at each federally registered establishment slaughtering equine. Omission or falsification of information on EIDs of horses presented for slaughter is an offence."

***CHDC*:** "The CHDC's 2011 'Pasture to Plate' report: http://canadianhorsedefencecoalition.wordpress.com/pasture-to-plate/ includes proof that **every single EID documented from Les Viandes de la Petite-Nation was incomplete in some way**, e.g.—owners' names not matching signatures, horse descriptions not matching pictures, or complete omission of required information.

"Why did the CFIA inspectors and slaughter plant operators not flag this for concern? What happened to 'omission or falsification of information on EIDS of horses presented for slaughter is an offence'? Furthermore, why are no EID databases being maintained?

"The information is being held by the slaughterhouses, not the CFIA, as evidenced in Dr. Evans' statement above, as well as in an Order Paper response from the Minister of Agriculture dated January 30, 2012. In his response, Minister Gerry Ritz advises that EIDs are being held by the slaughterhouses, and that a database has not yet been implemented. All EIDs need to be turned over to the CFIA in order to maintain a proper database, and a checking system should be in place, especially given that undercover evidence has proven the present system to be unacceptable."

"We have studied other letters from the CFIA, addressed to some of our supporters. This is a statement from Dr. Evans extracted from one such letter, referencing photographs of deficient EID documents: **(Evans letter to supporter)."**

***Dr. Evans*:** "The photographs recently published with purported deficiencies have been determined to be taken at an auction in the United States. There is no indication that these documents were presented to any Canadian slaughter plant."

CHDC**:** "This allegation is totally unfounded. The CFIA needs to review the photographs accompanying individual EID forms, and compare them to the matching tag numbers of the horses in the stun box in our report*, 'Pasture to Plate':* http://canadianhorsedefencecoalition.wordpress.com/pasture-to-plate/ **which unmistakably illustrates this connection**. **We wonder if our report, which has been posted on-line since release of the investigation in December 2011, has even been read by the CFIA. There can be no dispute that the EIDs, with attached pictures that were photographed at Les Viandes de la Petite-Nation, arrived along with the corresponding horses that were then subsequently slaughtered."**

Dr. Evans: "In response to your concern about the safety of horse meat, I want to assure you that CFIA is committed to its mandate and applies rigorous science-based safety standards to food from all species of animal, including equine. The combination of the equine information document (EID) system and the drug residue program administered by the CFIA form an integrated system for ensuring the safety of Canadian meat."

CHDC: "Besides the blatantly faulty EID system in place, we must also address horse meat testing. All along, the CFIA has insisted that muscle tissue is the target of choice when testing for phenylbutazone. Yet scientific studies show otherwise: *Metabolism Excretion, Pharma-cokinetics and Tissue Residues of Phenylbutazone in the Horse, Lees, P., Taylor , J.B., Maitho, T.E., Millar, J.D., Higgins, A.J., 1987: http://www.ncbi.nlm.nih.gov/pubmed/3568689*. The experts state that phenylbutazone ('bute') can more easily be detected in the kidney.

"In fact, Dr. Ann Marini, MD, PhD, and co-author of Food and Chemical Toxicology Report, 'Association of phenylbutazone usage with horses bought for slaughter: A public health risk': http://www.equinewelfarealliance.org/uploads/Food_and_Chemical_Toxicology_FINAL.pdf has this to say: 'Bute is a carcinogen and the levels that CAUSE cancer are UNKNOWN. So, bute residue levels in the muscle can't be detected by the current technology because the levels are below those that can be detected, but those levels may be sufficient to cause cancer or hypersensitivity syndromes that result in a serum sickness-like syndrome.

"In this syndrome, antibodies are produced against the drug but these same antibodies can and do react against 'self' resulting in an autoimmune syndrome which can result in antigen-antibody deposition in organs, leading to death. The sensitivity of bute in muscle is greater in children, so taking the sentence from the Irish Veterinary Journal article: even the minutest amount of bute can cause aplastic anemia in a child': http://www.veterinaryirelandjournal.com/Links/PDFs/CE-Large/CELA_Dec_2010.pdf.pdf**.**

"By the CFIA's own admission, two horsemeat samples tested positive for bute in Canada since 2010. We wonder how many more positive samples would have been found if the target tissue had been the correct one. Furthermore, the frequency of sample testing is abysmally low. According to Claude Boissoneault, CFIA National Specialist, Red Meat Non-Ruminant Species Program, '143 samples of equine meat were tested for phenylbutazone under the CFIA's residue testing program' in 2009. As 93,946 horses were slaughtered in Canada that year, it follows that **only 0.15% of the**

total number was tested for the presence of this dangerous, prohibited drug in 2009."

Summary

One can only speculate why the agency must expend so much energy on denial, rather than enforcing legislation and regulations that already exist and simply need to be utilized. And if animal welfare is not a high priority for the CFIA, what about the safety of human food?

Horses from a myriad of directions enter the slaughter pipeline. Whether bred for the racing industry or used as pleasure mounts, show horses, for trail riding or pack horses, many have been administered drugs such as phenylbutazone, which are strictly prohibited from entering the food chain. The CFIA may wish to deny the connection, but this will not erase what much of the public already knows – that the likelihood of prohibited drugs being inadvertently consumed by people in Quebec and overseas is very high.

It is time for a change. It is time for the Canadian government to set its sights on higher priorities than using companion animals to generate revenue and satisfy agricultural interests. Horses may be considered livestock under Canadian law, but that doesn't change the fact that most people consider them to be companion animals and working partners.

As far as the majority of the public is concerned, horses are cherished animals whose veterinary needs must be met in much the same way as those of other domestic pets. The vast majority of horses in Canada are not raised or treated as food animals. Yet the CFIA chooses to ignore this crucial fact.

It is time for the denial to stop and for truth and the pursuit of justice to take its place.

It is also time for the CFIA and the Minister of Agriculture to take responsible action and close Canada's horse slaughter industry, once and for all.

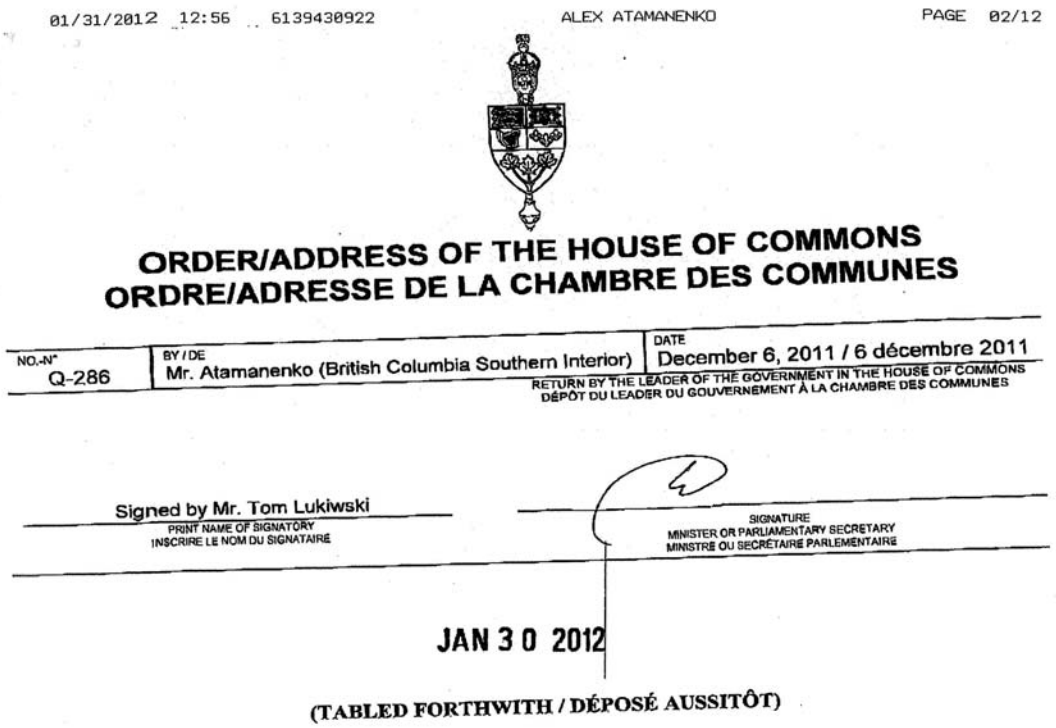
The Canadian Horse Defence Coalition

Attachments:

Appendix A – January 2012 Order Paper Response (Pages 9-19)
and Order Paper Question (Page 19)
Appendix B – February 2012 Letter from CFIA to Sinikka Crosland, CHDC (Pages 20-22)
Appendix C – February 2012 CFIA response to a CHDC Supporter (Pages 23-25)
and January 2012 Supporter Letter to CFIA (Page 25-26)

APPENDIX A

Order Paper:



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ORDER/ADDRESS OF THE HOUSE OF COMMONS
ORDRE/ADRESSE DE LA CHAMBRE DES COMMUNES

NO.-N°	BY / DE	DATE
Q-286	Mr. Atamanenko (British Columbia Southern Interior)	December 6, 2011 / 6 décembre 2011

RETURN BY THE LEADER OF THE GOVERNMENT IN THE HOUSE OF COMMONS
DÉPÔT DU LEADER DU GOUVERNEMENT À LA CHAMBRE DES COMMUNES

Signed by Mr. Tom Lukiwski
PRINT NAME OF SIGNATORY
INSCRIRE LE NOM DU SIGNATAIRE

SIGNATURE
MINISTER OR PARLIAMENTARY SECRETARY
MINISTRE OU SECRÉTAIRE PARLEMENTAIRE

JAN 3 0 2012

(TABLED FORTHWITH / DÉPOSÉ AUSSITÔT)

INQUIRY OF MINISTRY
DEMANDE DE RENSEIGNEMENT AU GOUVERNEMENT

PREPARE IN ENGLISH AND FRENCH MARKING "ORIGINAL TEXT" OR "TRANSLATION"
PRÉPARER EN ANGLAIS ET EN FRANÇAIS EN INDIQUANT "TEXTE ORIGINAL" OU "TRADUCTION"

QUESTION NO./Nº DE LA QUESTION	BY / DE	DATE
Q-286[2]	Mr. Atamanenko (British Columbia Southern Interior)	December 6, 2011

REPLY BY THE MINISTER OF AGRICULTURE AND AGRI-FOOD AND MINISTER FOR THE CANADIAN WHEAT BOARD
RÉPONSE DU MINISTRE DE L'AGRICULTURE ET DE L'AGROALIMENTAIRE ET MINISTRE DE LA COMMISSION CANADIENNE DU BLÉ

Signed by Gerry Ritz, PC, MP

PRINT NAME OF SIGNATORY
INSCRIRE LE NOM DU SIGNATAIRE

SIGNATURE
MINISTER OR PARLIAMENTARY SECRETARY
MINISTRE OU SECRÉTAIRE PARLEMENTAIRE

QUESTION

With regard to the horse slaughter industry in Canada: (*a*) does the government know whether third party monitoring of video footage is occurring at Viandes Richelieu and Bouvry Exports and, if so, (i) what is the monitoring criteria, (ii) who is monitoring the footage, (iii) what actions, if any, have been taken as a result of observations, (iv) is footage monitoring to be a daily practice at this and other Canadian horse slaughter plants, (v) how many hours have been monitored, (vi) is footage archived and for how long, (vii) does the recording continuously loop over previous footage;...

See full text of the question attached.

REPLY / RÉPONSE

ORIGINAL TEXT / TEXTE ORIGINAL [X] TRANSLATION / TRADUCTION [ ]

Canadian Food Inspection Agency

See attached reply

Q-286 - December 6, 2011 - Mr. Atamanenko (British Columbia Southern Interior) - With regard to the horse slaughter industry in Canada:	
	Response
(a) does the government know whether third party monitoring of video footage is occurring at Viandes Richelieu and Bouvry Exports and,	The Canadian Food Inspection Agency (CFIA) is not aware of third party monitoring of video footage in horse slaughter facilities. Specific rules under the Privacy Act prohibit the CFIA from mandating the installation of video cameras in these establishments. However, CFIA inspectors are present daily in federally registered establishments to verify that animal welfare requirements are met and that meat inspection standards are adhered to by industry.
if so, (i) what is the monitoring criteria,	N/A
(ii) who is monitoring the footage,	N/A
(iii) what actions, if any, have been taken as a result of observations,	N/A
(iv) is footage monitoring to be a daily practice at this and other Canadian horse slaughter plants,	N/A
(v) how many hours have been monitored,	N/A
(vi) is footage archived and for how long,	N/A
(vii) does the recording continuously loop over previous footage;	N/A
(b) which tissue types and/or bodily fluids are targeted by the government when testing for phenylbutazone and other drugs in horsemeat,	Under the National Chemical Residue Monitoring Program, the CFIA strives to test the most sensitive tissue which, for phenylbutazone (PBZ), is muscle. For other drugs the most sensitive tissue may be eyes, fat, kidney or liver.
(i) what percentage of drug testing is performed on equine organs (particularly kidney and liver) as opposed to other tissues, such as muscle,	30% of testing for veterinary drug residues in horses is done on horse muscle while 70% is done on other organs.

Q-286 - December 6, 2011 - Mr. Atamanenko (British Columbia Southern Interior) - With regard to the horse slaughter industry in Canada:	
	Response
(ii) what is the exact methodology and specific testing mechanisms that are used to detect phenylbutazone and other drugs in horsemeat;	The citation for the method that is being used is as follows: Development and validation of a method for the determination of phenylbutazone drug residues in bovine, equine, and porcine muscle tissues using High Performance Liquid Chromatography (HPLC) with UV detection. Journal of Liquid Chromatography and Related Technologies Volume 27, Issue 19, 2004, Pages 3013-3027 http://www.scopus.com/source/sourceInfo.url?sourceId=24640&origin=recordpage The methodology has been validated according to internationally accepted validation protocols and published in the peer-reviewed journal "Journal of Liquid Chromatography and Related Technologies" and has been deemed fit-for-purpose. The Saskatoon laboratory has been accredited by the Standards Council of Canada for this method under the ISO-17025 standard. The testing mechanism is summarized as follows: Homogenized horse meat is blended with solvents to dissolve any drugs that may be present. This liquid (extract) is then purified using common laboratory techniques which remove impurities such as fat, protein and oils. The extract is then concentrated into a smaller volume so trace concentrations of any targeted drugs can be detected. If there are any targeted drugs present they are identified by Mass Spectrometry which provides definitive identification of the drug as well as precise quantification of the concentration of the compound present in the sample.
(c) what surveys or studies has the government undertaken or relied on to	The government does not rely on surveys or studies to determine the number of horse owners / keepers who have administered medications to horses. All equine owners

Q-286 - December 6, 2011 - Mr. Atamanenko (British Columbia Southern Interior) - With regard to the horse slaughter industry in Canada:	
	Response
determine the number of overall horse owners and keepers that have administered to horses under their care, even once in the horse's lifetime, substances that are banned for human consumption, in	intending to sell animals directly or indirectly to Canadian meat processors provide an Equine Information Document (EID) which reports all vaccines, medications or any occurrence of illness within six months of slaughter. Use of the EID is required under the Meat Hygiene Manual of Procedures and is therefore referenced in the *Meat Inspection Regulations*. The CFIA enforces these regulations. Each EID is verified by the plant operator and systematically reviewed by a CFIA veterinarian. General use studies that provide an estimate of medication use do not provide specific information pertaining to each equine presented for slaughter and as such are of limited value when determining the acceptability for slaughter of an individual equine.
(i) Canada,	N/A
(ii) the United States (US);	N/A
(d) what surveys or studies encompassing the overall horse population has the government undertaken or relied on to determine the percentage of veterinarians who routinely administer to horse patients under their care, at any time in the horse's lifetime, substances that are banned for use in food animals, in	The requirements for reporting medication use within six months of slaughter applies to all equine presented for slaughter. General use studies that provide an estimate of medication use do not provide specific information pertaining to each equine presented for slaughter and as such are of limited value when determining the acceptability for slaughter of an individual equine. The CFIA employs veterinarians competent in and familiar with pharmaceutical use within the equine industry, and a combination of scientific literature review and continuing education allows veterinarians to remain current on new research.
(i) Canada,	N/A
(ii) the US;	N/A

Q-286 - December 6, 2011 - Mr. Atamanenko (British Columbia Southern Interior) - With regard to the horse slaughter industry in Canada:	
	Response
(e) what was the ratio between the number of horses and the number of prescriptions of substances banned for use in food animals at any time in their lifetime, issued by veterinarians to the overall horse population in	This information is privately held by veterinarians practicing in Canada and the U.S.
(i) Canada,	N/A
(ii) the US;	N/A
(f) what were the results of European Commission audits of federally-inspected Canadian equine slaughter plants in 2010;	The EU recently audited the Canadian equine system within a larger audit of the Canadian meat inspection system. In relation to horse slaughter, the EU recommended that Canada ensure equivalent guarantees regarding use of substances given for horses imported from the U.S. for slaughter. In response to the audit recommendation, the CFIA is currently working with the U.S. to strengthen U.S. oversight with respect to the EID for U.S. origin animals exported to Canada. EU market access has been maintained for equine and other approved meat.
(g) does the government have any plans to adopt a policy similar to that of the European Union which stamps new passports on horses over the age of six months as ineligible for the food supply;	The CFIA implemented a process to achieve an equivalent outcome to the EU policy based on the Equine Information Document (EID). Both approaches serve to ensure that equine animals entering the human food chain have not had exposure to non-approved substances within the past 6 months. The EU has accepted the EID as an alternative to their passport system.
(h) are the Equine Identity Documents (EID) being kept on record by the slaughter plants;	Equine Information Documents (EIDs) are to be filed by the operator of the federally registered establishment.

The Canadian Food Inspection Agency (CFIA) Page 4

Q-286 - December 6, 2011 - Mr. Atamanenko (British Columbia Southern Interior) - With regard to the horse slaughter industry in Canada:	Response
(i) are the EID records being audited by the Canadian Food Inspection Agency;	Review of the EID occurs daily and is conducted by trained CFIA veterinarians at each establishment slaughtering equine.
(j) what were the results of the most recent audit;	Each animal's EID is verified by the operator and reviewed by a CFIA veterinarian daily. Should an animal's medication history disqualify if from human consumption due to use of non-permitted drugs or inadequate withdrawal period, the animal is diverted from slaughter.
(k) has a database been started that can track the EIDs;	A national traceability program for all food animals, including equine, is currently under development. Consideration is being given to integrate components of the EID into a lifelong traceability program.
(l) how many times has the information provided on the EIDs for horses imported from the US been investigated and verified by the slaughterhouse owners,	All horses (both Canadian and US origin) presented for slaughter must have an accompanying EID. As part of ante-mortem screening, it is the responsibility of the slaughter operator to review all submitted EIDs to determine if they are complete and if the animals corresponding to the EIDs may be acceptable for slaughter. No horses will be slaughtered before the EIDs are checked.
(i) how many slaughterhouse investigations into information on US-sourced EIDs led to horses being rejected as unsuitable for human consumption,	A review of EIDs by the slaughter operator led to the rejection of 23 horses from the US that were deemed unfit for human consumption in 2011. The horses were disposed of in accordance with CFIA regulatory requirements. The rejection of non-compliant horses by slaughter operators demonstrates industry's commitment to public health.
(ii) how were the US horses deemed unsuitable for human consumption following EID investigations disposed of by the slaughterhouses;	Unacceptable horses are killed by stunning, bleeding and then conveyed to the inedible section. Condemned carcasses and all related parts are rendered.

The Canadian Food Inspection Agency (CFIA) Page 5

Q-286 - December 6, 2011 - Mr. Atamanenko (British Columbia Southern Interior) - With regard to the horse slaughter industry in Canada:	
	Response
(m) how many times has the information provided on the EIDs for horses acquired from Canadian sources been investigated and verified by the slaughterhouse owners,	All horses (both Canadian and US origin) presented for slaughter must have an accompanying EID. As part of ante-mortem screening, it is the responsibility of the slaughter operator to review all submitted EIDs to determine if they are complete and if the animals the EIDs represent may be acceptable for slaughter.
(i) how many investigations on Canadian horses led to their rejection as unsuitable for human consumption,	A review of EIDs by the slaughter operator led to the rejection of 2 horses from Canada that were deemed unfit for human consumption in 2011. The horses were disposed of in accordance with CFIA regulatory requirements.
(ii) how were Canadian horses deemed unsuitable for human consumption disposed of by the slaughterhouses,	Unacceptable horses are killed by stunning and bleeding and conveyed to the inedible section. Condemned carcasses and all related parts are rendered.
(iii) how many slaughterhouse investigations into the EID information on Canadian-sourced horses led to them being rejected as unsuitable for human consumption;	A review of EIDs by the slaughter operator led to the rejection of two horses that had been deemed unfit for human consumption (the horses were disposed in accordance with CFIA regulatory requirements).
(n) as a result of information provided on the EIDs, how many horses were quarantined	No horses originating in the United States or Canada were put under quarantine or isolated.
(i) from US sources,	None (0)
(ii) from Canadian sources;	None (0)
(o) how many downer horses were discovered by slaughterhouses in trucks	See answers on (i) and (ii).

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arriving with shipments of equines from	
(i) US sources,	For 2011, 31 horses were found down in trucks transporting equines from the United States.
(ii) Canadian sources;	For 2011, no horses were found down in trucks transporting equines originating in Canada.
(p) for in each case in (*n*) above, how were the downer horses and their carcasses and meat disposed of;	Horses were euthanised in the truck and carcasses were conveyed to the inedible section.
(q) in response to the findings of the February 2010 undercover investigations at Bouvry Exports and Viandes Richelieu, what changes have been made in the regulations, operations, inspections and infrastructure at federally-inspected facilities that slaughter equines; and	In response to the 2010 undercover investigations, a team of experts visited each plant and an in-depth review of the processes and procedures was undertaken. As a result, training of both plant and CFIA staff was enhanced and awareness built around the foundation of the program. As well, subsequent to the 2010 investigations, CFIA has continued to strengthen its humane transport and slaughter infrastructure through two significant modifications: 1. As of January 1, 2012, all shipments of feeder and slaughter horses entering Canada from the US by ground transportation are required to proceed through designated ports of entry. The designated ports of entry have appropriate unloading facilities for horses and are staffed by CFIA veterinarians. The CFIA is implementing these new measures to verify that horses are being humanely transported in accordance with the Health of Animals Regulations. 2. CFIA has modernized and strengthened requirements for the humane slaughter of all species in Chapter 12 of the Meat Hygiene Manual of Procedures. The revised Chapter 12 was implemented first in horse slaughter establishments. A significant modification is that operators of federally registered establishments are required to develop, implement

Q-286 - December 6, 2011 - Mr. Atamanenko (British Columbia Southern Interior) - With regard to the horse slaughter industry in Canada:	
	Response
	and maintain a written animal welfare program for each species they process, ensuring compliance with industry performance standards and regulatory requirements.
(r) In what ways was the individual and management held accountable by the government or in the courts for the incident revealed in the 2010 undercover footage of an employee hitting a horse in the face multiple times?	The actions that were viewed in the video were deemed by enforcement experts to be inadequate for meeting the standards for evidence and proof required for prosecution. Information such as place, time and clear identification of the individual was not available with sufficient certainty to proceed in that direction.

Q-286[2] — December 6, 2011 — Mr. Atamanenko (British Columbia Southern Interior) — With regard to the horse slaughter industry in Canada: (*a*) does the government know whether third party monitoring of video footage is occurring at Viandes Richelieu and Bouvry Exports and, if so, (i) what is the monitoring criteria, (ii) who is monitoring the footage, (iii) what actions, if any, have been taken as a result of observations, (iv) is footage monitoring to be a daily practice at this and other Canadian horse slaughter plants, (v) how many hours have been monitored, (vi) is footage archived and for how long, (vii) does the recording continuously loop over previous footage; (*b*) which tissue types and/or bodily fluids are targeted by the government when testing for phenylbutazone and other drugs in horsemeat, (i) what percentage of drug testing is performed on equine organs (particularly kidney and liver) as opposed to other tissues, such as muscle, (ii) what is the exact methodology and specific testing mechanisms that are used to detect phenylbutazone and other drugs in horsemeat; (*c*) what surveys or studies has the government undertaken or relied on to determine the number of overall horse owners and keepers that have administered to horses under their care, even once in the horse's lifetime, substances that are banned for human consumption, in (i) Canada, (ii) the United States (US); (*d*) what surveys or studies encompassing the overall horse population has the government undertaken or relied on to determine the percentage of veterinarians who routinely administer to horse patients under their care, at any time in the horse's lifetime, substances that are banned for use in food animals, in (i) Canada, (ii) the US; (*e*) what was the ratio between the number of horses and the number of prescriptions of substances banned for use in food animals at any time in their lifetime, issued by veterinarians to the overall horse population in (i) Canada, (ii) the US; (*f*) what were the results of European Commission audits of federally-inspected Canadian equine slaughter plants in 2010; (*g*) does the government have any plans to adopt a policy similar to that of the European Union which stamps new passports on horses over the age of six months as ineligible for the food supply; (*h*) are the Equine Identity Documents (EID) being kept on record by the slaughter plants; (*i*) are the EID records being audited by the Canadian Food Inspection Agency; (*j*) what were the results of the most recent audit; (*k*) has a database been started that can track the EIDs; (*l*) how many times has the information provided on the EIDs for horses imported from the US been investigated and verified by the slaughterhouse owners, (i) how many slaughterhouse investigations into information on US-sourced EIDs led to horses being rejected as unsuitable for human consumption, (ii) how were the US horses deemed unsuitable for human consumption following EID investigations disposed of by the slaughterhouses; (*m*) how many times has the information provided on the EIDs for horses acquired from Canadian sources been investigated and verified by the slaughterhouse owners, (i) how many investigations on Canadian horses led to their rejection as unsuitable for human consumption, (ii) how were Canadian horses deemed unsuitable for human consumption disposed of by the slaughterhouses, (iii) how many slaughterhouse investigations into the EID information on Canadian-sourced horses led to them being rejected as unsuitable for human consumption; (*n*) as a result of information provided on the EIDs, how many horses were quarantined (i) from US sources, (ii) from Canadian sources; (*o*) how many downer horses were discovered by slaughterhouses in trucks arriving with shipments of equines from (i) US sources, (ii) Canadian sources; (*p*) for in each case in (*n*), how were the downer horses and their carcasses and meat disposed of; (*q*) in response to the findings of the February 2010 undercover investigations at Bouvry Exports and Viandes Richelieu, what changes have been made in the regulations, operations, inspections and infrastructure at federally-inspected facilities that slaughter equines; and (*r*) in what ways was the individual and management held accountable by the government or in the courts for the incident revealed in the 2010 undercover footage of an employee hitting a horse in the face multiple times?

APPENDIX B

Evans Letter to CHDC

Canadian Food Inspection Agency
Agence canadienne d'inspection des aliments
1400 Merivale Road
Ottawa, Ontario K1A 0Y9

FEB 2 6 2012

CVO 009337

Ms. Sinikka Crosland
Executive Director
Canadian Horse Defence Coalition
150 First Street
PO Box 21079
Orangeville, Ontario L9W 4S7

sinikka@defendhorsescanada.org

Dear Ms. Sinikka Crosland:

Thank you for your correspondence of email of January 4, 2012, and your ongoing interest in the humane treatment of horses in transport and at slaughter. We appreciate the opportunity to respond to your concerns.

We want to assure you that the Canadian Food Inspection Agency (CFIA) takes all allegations of animal welfare violations seriously. The CFIA reviewed the video footage and conducted an investigation at Les Viandes de la Petite-Nation. As a result, an increased inspection presence has been undertaken and additional reviews of the operation are being conducted. This effort is ongoing and its findings will determine appropriate actions to be taken. The CFIA responds to all reports received concerning humane transportation of animals and humane slaughter that fall within the mandate assigned to it by the Government of Canada through legislation and regulation.

To suggest that the CFIA has not taken action in the past when concern was raised is not supported by the facts. As a result of investigations and subsequent enhanced inspection activities, a number of actions have been taken, including training and certification delivered, construction standards changed, operations suspended in response to corrective actions required and operating licences revoked where a company was not able to demonstrate its ability to consistently meet its regulatory obligations.

I understand the frustration you have expressed at the inability of the recently released undercover video footage to be used for regulatory enforcement purposes. There are significant limitations to the use of video footage in the absence of eye witness testimony as the basis for enforcement or prosecution purposes. This can be further compounded when there is a significant time lag between the shooting of the video and its presentation to the CFIA and when the video has been edited. For these reasons, we strongly urge those who witness events that they believe to be violations of regulations to bring the matter to the immediate attention of a CFIA inspector so that it can be documented and evidence collected and secured that would support subsequent proceedings as warranted.

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Canada

In the case of the most recent video release, concerns have been expressed about the effectiveness of the stunning applied to ensure that the animal is insensible prior to proceeding to the next stage of the kill process. Recognized subject matter experts and international humane standards call for assessment of several critical features to affirm the effectiveness of the stun procedure that include the eye, the tongue and the nose, which can only be determined from the front of the animal. As the video was taken from behind, it is not possible to conclusively use the video to make these assessments.

In the case of Les Viandes de la Petite-Nation, there is an established practice of "security stunning" in this establishment (giving a second stun while the animal is still unconscious if there is reason to believe that it will not remain unconscious long enough to be bled out). This is a recommended practice and is in the best interest of the animal. With respect to the large Belgian that is seen to have received multiple stuns, while its state of consciousness is unclear, nevertheless this is one area of operations being assessed.

As you are no doubt aware, CFIA inspectors are empowered under the authority of the *Meat Inspection Act* and the *Meat Inspection Regulations* to intervene when they observe humane handling infractions at the slaughterhouse. CFIA inspectors are able to halt the production line or issue requests for corrective actions. In response to severe or repeated infractions, the licence of an operator to produce meat for human consumption can be suspended or cancelled. The CFIA uses a graduated approach to enforcement. When determining the gravity of the non-compliance, the CFIA assesses the harm posed by the action, the compliance history of the regulated party and the intent to knowingly commit an offence.

In response to your concern about the safety of horse meat, I want to assure you that CFIA is committed to its mandate and applies rigorous science-based safety standards to food from all species of animal, including equine. The combination of the equine information document (EID) system and the drug residue program administered by the CFIA form an integrated system for ensuring the safety of Canadian meat. This system is consistent with international standards and regularly audited by importing countries. The last audit was conducted by the European Union (EU) in 2010. I have enclosed a copy of the final audit report for your review.

To assist the equine industry in making informed decisions about drug use, the CFIA and Health Canada maintain a list of drugs that are safe for use in animals intended for human consumption along with withdrawal periods for each drug. This list has been distributed to the equine industry and can be found in the Meat Hygiene Manual of Procedures, Annex E, sections 6 and 7, at www.inspection.gc.ca/english/fssa/meavia/man/ch17/annexee.shtml. Annex E, section 5, contains a list of drugs that are prohibited for use in equine intended for human consumption.

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The EU has accepted the EID as an alternative to its passport system because both systems achieve a similar outcome. As per internationally accepted standards, both systems help ensure compliant drug use by requiring a minimum six-month medical history for equine presented for slaughter. EIDs are checked daily by CFIA veterinarians and filed by operators at each federally registered establishment slaughtering equine.

Omission or falsification of information on EIDs of horses presented for slaughter is an offence. Thank you for providing copies of the EIDs that are alleged to be incomplete or inaccurate. CFIA officials are following up. Should any of the EIDs be found to be unacceptable, corrective action will be taken to ensure that the problem does not continue.

The EID system works in conjunction with other steps used to provide assurances and opportunities for enhancement of safe equine meat production. All federally registered slaughter facilities must be compliant with the *Meat Inspection Act* and the *Meat Inspection Regulations*. Each facility is subject to continued CFIA inspection, including both pre- and post-slaughter inspection. Also, random and residue sampling of meat is conducted within the framework of the National Chemical Residue Monitoring Program.

In addition to the safeguards in place here in Canada, importing countries generally apply their own residue programs for food products crossing their borders. This includes drug residue testing by countries importing Canadian horsemeat. The low rate of detections of unacceptable residues in Canadian horsemeat, despite the scrutiny and testing to which it is subjected both here and abroad, speaks to the effectiveness of the system. This, in combination with the absence of reported cases of human illness resulting from the consumption of Canadian horsemeat, enables me to confidently reassure you of the safety of Canadian horsemeat.

The CFIA is fully committed to the continuous review and improvement of our inspection programs and tools, such as the EID, against international best practices.

Once again, thank you for raising your concerns and giving us the opportunity to assure you that animal welfare is a priority in the CFIA and to describe recent activities reinforcing that direction.

Yours sincerely,

Dr. Brian Evans
Chief Veterinary Officer
Chief Food Safety Officer

Enclosure

APPENDIX C

Supporter Communication with Dr. Evans

(Due to privacy concerns, the name of our supporter is being withheld.)

From: Brian Evans [Brian.Evans@inspection.gc.ca]

Sent: February-24-12 7:16 AM

To: XXXXXXX

Subject: Re: Real Response is Required!

Dear XXXXXXXX

I wish to acknowledge receipt of your email correspondence of January 21, 2012. Your sharing of your concerns is very much valued and appreciated. I also commend your passion for the well being and duty of care that horses and all animals deserve.

The issue of horse slaughter is indeed an emotional issue with many disparate views among horse owners, horse associations and horse admirers concerning the production of horse meat for human consumption. However there is no debating the expectation that any slaughter process be conducted in a humane manner. As someone who was blessed with the joy of being raised with and showing horses myself, and as a veterinarian who spent several years in private practice myself involving a considerable percentage of equine clients, I can assure you of my unyielding commitment to the welfare and well being of horses in Canada.

The Canadian Food Inspection Agency continues to make increased investments in supervision and audits of licensed establishments, training of inspection and establishment personnel. reviews of construction standards and advocating of continuous video surveillance to ensure that standards are respected and enforced. At the same time, I continue to support all enforcement efforts when non-compliance is identified to the full extent that existing authorities allow.

I understand the frustration you have expressed at the inability of the recently released undercover video footage to be used for regulatory enforcement purposes. There are significant challenges to the use of video footage in the absence of eye witness testimony as the basis for enforcement or prosecution purposes. This can be further compounded when there is a significant time lag between the shooting of the video and its presentation to the CFIA and when the video has been edited. For these reasons we strongly urge those who witness events that they believe to be violations of regulations to bring the matter to the immediate attention of a CFIA inspector so that it can be documented appropriately and evidence collected and secured that would support subsequent proceedings as warranted.

In the case of the most recent video release, concerns have been expressed about the effectiveness of the stunning applied to ensure the animal is insensible prior to proceeding to the next stage of the slaughter process. Recognized subject matter experts and international humane standards call for assessment of several critical features to affirm the effectiveness of the stun procedure that include the eye, the tongue, the nose which can only be determined from the front of the animal. As the video was taken from behind, it is not possible to conclusively use the video to make these assessments.

While the video itself has limitations as the basis for regulatory actions, nevertheless the CFIA does respond to each and every report it receives. As in all such situations an investigation was initiated, an increased inspection presence undertaken and additional reviews of the operations are being conducted. This effort is ongoing and its findings will determine actions to be taken.

To suggest that the CFIA has not taken action in the past when concerns were raised is not supported by the facts. In regards to investigations and increased inspection intensity that followed previous undercover video releases a number of actions have been taken including operating licenses have been revoked, operations suspended in response to corrective actions required and construction standards changed.

You have expressed concerns about the safety of horse meat with respect to possible drug residues and referenced photos of Equine Identification Documents (EID) that are purported to be incomplete, inaccurate or falsified. All equine owners intending to sell animals directly or indirectly to Canadian meat processors must provide an EID which reports all vaccines, medications or occurrences of illness within six months of slaughter. The photographs recently published with purported deficiencies have been determined to be taken at an auction in the United States. There is no indication that these documents were presented to any Canadian slaughter plant. The CFIA inspector at an establishment is required to review 100% of the documents when animals are presented and must sign the document before an animal can be accepted for slaughter. Horses presented for slaughter in Canada with incomplete EID's are prevented from being slaughtered for human consumption. Furthermore, should an animals medication history disqualify it from human consumption due to use of non-permitted drugs or inadequate withdrawal period, the animal is diverted from slaughter. Should an inspector determine that a document is fraudulent or suspect, they are also empowered to refuse the animal and the presenter of such a document may be subject to further enforcement action.

The vast majority of horses delivered for slaughter in Canada are healthy. Nevertheless, in addition to EID review, Canada utilizes veterinarians and supervised trained inspectors in each slaughter plant to identify any animals that, based on their appearance or history, may have been treated with a substance, and have the meat from those animals held from distribution until testing is performed and no residues found. Canada also performs random testing of animals for drug residues at a frequency designed to detect trends in drug use violations.

In the case of drugs where the maximum residue limit is zero, such as phenylbutazone, should any trace be detected during testing, the information is provided to Health Canada for the conducting of a health hazard assessment and appropriate diversion, disposal or recall action taken. The test methods ad equipment utilized for testing are among the most sensitive available and are able to provide detection at a level of one in a trilliion. Furthermore countries, which import from Canada conduct their own audits of the operations of Canadian establishments and testing of imported products to further affirm their safety.

You have also referenced the private members bill presented to the Houseof Commons. Under the Westminster system of parliamentary democracy in Canada, the selection and debate of private members bills is the exclusive responsibility of elected representatives and your engagement with them through petitions and correspondence is an important element in making a difference.

Your voice and views are welcomed and as previously stated your taking the time to write is very much appreciated. Horse owners are responsible for determining the difficult end of life decisions for their animals. While you may have views to the contrary, the over seven hundred veterinarians working for the CFIA do take their professional oaths and responsibilities very seriously.

Dr. Brian Evans
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Facsimile / Télécopieur : (613) 773-6060
Chief Veterinary Officer/ Vétérinaire en chef
Chief Food Safety Officer/
Chef de la salubrité des aliments
Delegate of Canada to the World Organization for Animal Health (OIE)/Délégué du Canada auprès de l'Organisation Mondiale de la Santé Animale (OIE)
Office of the President/Bureau du Président
Canadian Food Inspection Agency Agence canadienne d'inspection des aliments
1400 Merivale Road , Ottawa ON K1A 0Y9
Government of Canada | Gouvernement du Canada
www.inspection.gc.ca

>>> "XXXXXXXX" <XXXXXXX@shaw.ca> 1/21/2012 1:27 am >>>

Dear Mr. Evans, January 20, 2012

You may be getting sick of hearing from us, but we are getting sick of having our concerns ignored! We are Canadians speaking out about a matter that goes against the morality of most of the population in this country, and our Government chooses to turn a blind eye to this issue! We are gaining support and strength as every day passes, and we will not stop because there are thousands of horses suffering inhumane treatment which is condoned by our Conservative government and government inspectors!

We (being regular Canadians, not "radicals" just people who care) are outraged that this is allowed to continue. The fact that most of these horses contain substances in their systems which are banned in food animals due to the dangers posed when consumed, seems to be a problem our government, again, is trying to dispel and keep under the radar. I am waiting for the lawsuits which should be arriving soon-but who will have to pay? We the taxpayers that is who. For the ineptitude and ignorance of our own government officials!!

The petitions to ban horse slaughter are being signed all across this country. There is a massive show of support for Bill C-322 to end horse slaughter in this country. Horses, being innately different from other animals raised for food (we all know horses are not normally raised for food), suffer far more than most other animals that are sent to slaughter. Most veterinarians and horse experts

(that do not work for the government) who have witnessed horse slaughter agree that it is impossible to humanely slaughter horses.

You have been sent paperwork showing the lack of verifiable information pertaining to medication administered to horses slaughtered in Canada. This is a very real risk to human lives and health-especially children.

Several undercover footage tapes, some very recent, obtained by people who have had access to equine slaughter plants is readily available and you have been sent this information on many occasions.

Why have you not shut down the plants where these grievous and disturbing crimes of animal cruelty have been disclosed??

Why is our government allowing this horrific cruelty to continue?? There must be an underlying reason, and the only reason that pops to mind.is money.

What else could perpetuate the continuance of blatant cruelty in a country that is supposed to be humane? Money, corruption-wish I didn't have to say it, but that is what this is starting to look like.

Something will be done-if not by you, then by your successor. It breaks my heart, and the hearts of thousands of Canadians, that while we write and fight for change, the horses suffer every minute of every day.

We would really appreciate a professional response, not rhetoric, or more assurances that all is being taken care of because we know that to be a lie. This is not going away - please address this important issue with the compassion and morals of a true Canadian.

XXXXXXXX
Email: XXXXXX@shaw.ca
Supporter of the Canadian Horse Defence Coalition
Web: www.defendhorsescanada.org
Mail: info@defendhorsescanada.org