

*Note: Sue Wallis' original statements are in blue text. Our information is in black text.*

## Frequently Asked Questions – Unified Equine, LLC – Mountain Grove, Missouri Feasibility Study

### How will waste be handled?

**An equine processing plant will have much less demand on the waste water treatment system than a standard livestock processing facility because an equine carcass has much less fat.**

This statement could not possibly be more inaccurate or misleading. Horse slaughter plants in general, and the Chevideco run Dallas crown plant in particular, have a long history of major waste disposal issues.

A waste water treatment plant must handle several waste materials from a slaughter plant. Oil and grease are only one form of waste. Even so, Chevideco (dba Waldo, Inc., dba Dallas Crown) did a very poor job of treating even this waste material. After many years of significant issues, in 1999 the City and Chevideco attorneys worked out an agreement to change the way violations were measured.

Instead of Oil and Grease (fat), the regulations were re-written so violations were based on BOD (bio oxygen demand) and TSS (total suspended solids), substituting these for Oil and Grease. This is the system of metrics used by most modern treatment plants and their thinking being that it would be easier for Chevideco to comply with BOD and TSS (more explanation below).

This was decidedly not the case as the violations were as bad or worse under the new system of measurement. Claiming a horse's low body fat to be a major ameliorating factor is very misleading and an inaccurate portrayal of the reality of having a horse slaughter plant. Equines have 1.75 times as much blood per pound of body weight. Worse, it often contains medications such as antibiotics that cause waste treatment plants to fail because they are based on "friendly bacteria" to break down the waste. Moreover, the residues make the blood impossible to market to renders as blood meal. The DAF system heralded by horse slaughter's promoters is the same system that Dallas Crown (dba Waldo, Inc., dba Chevideco) used in the city of Kaufman, TX, producing in 19 months 481 violations and loading the waste water treatment plant.



The fecal waste is also contaminated and there is no market for it as fertilizer. Some years ago Campbell's Soup Company announced they would no longer use manure from race tracks to fertilize their mushrooms because the drugs were being taken up in the mushrooms.

Water treatment may include state-of-the-art technologies such as Dissolved Air Flotation Systems (DAF) which is a water treatment process that clarifies wastewater through the removal of suspended matter such as oil, greases or solids. The removal is achieved by dissolving air in the water or wastewater under pressure and then releasing the air at atmospheric pressure in a flotation tank or basin. The released air forms tiny bubbles which adhere to the suspended matter causing the suspended matter to float to the surface of the water where it is then removed by a skimming device. These systems are used to meet the needs of a variety of industries requiring the removal of effluents from their wastewater system. Dissolved Air Flotation (DAF) is a highly efficient method for removal of turbidity, color, suspended solids and other contaminants from water. It has become widely accepted for use in potable water treatment, municipal wastewater as well as a variety of industrial applications including meat processing facilities.

This information was simply copied straight out of [Wikipedia](#) and shows absolutely no understanding of the issue or its history. It also shows that Unified Equine is trying to fake expertise in the matter.

*The Chevideco, Waldo, Inc., Dallas Crown facility used this system and was continual violation of environmental laws. The waste water treatment plant was strained and burdened such that all aerators had to be used at full speed, with commensurate wear and tear on equipment and high electrical consumption, with no back up, and capacity levels approaching mandated multimillion dollar expansion.*

Suspended solids (called TSS or Total Suspended Solids) are only one of several measures of wastewater. Moreover, they are not even the problem that horse slaughter plants traditionally have and were the only parameters that the Cavel plant in Illinois consistently passed.

BOD or Bio-Chemical Oxygen Demand is a much bigger issue. Bacteria can break down organic waste, but to do so they absorb oxygen. Thus, the demand for oxygen is used as a measure of the organic material in the waste stream.

The Cavel plant in Illinois was equipped with a state of the art, modern waste treatment system and yet during its three years of operation it was in continuous violation of the law, failing monthly average BOD levels all but once in its last year of operation.

NH<sub>3</sub> or ammonia is another contaminant that horse slaughter plants have in abundance. Organic nitrates rapidly form NH<sub>3</sub> in such systems. Nitrates can have serious health effects if they get into well water. Moreover they are a nutrient to algae and thus cause destructive



algae plumes if they run off into rivers and streams. Cavel was in violation of NH<sub>3</sub> levels every month of its last year of operation.

Also of concern is pH (acidity). Most waste systems require intake to remain near neutral (5.5-9.5). The Cavel plant discharged waste as acid as 3.24 and as basic as 11.78. Dallas Crown had similar pH issues and violations, causing serious problems in treating waste water and complying with state regulations. Cavel had 7 pH violations in their last 12 months of operation. Other metrics may include CBOD (carbonaceous bio oxygen demand--blood), and COD (chemical oxygen demand).

If pre-treatment technologies are not sufficient, then pre-treated wastewater will be discharged to a lined lagoon system built to meet or exceed all requirements of the Department of Natural Resources, and regularly maintained, which treats the water to more than acceptable levels before discharge or use as irrigation or other purposes. It is possible that treated and clean water may be recycled for use in the plant.

Such a lagoon causes very significant odor issues and is a ticking environmental time bomb as many property owners near such can attest. Soil types, a natural disaster, even a heavy rain event make lagoons a kind of 'third world' and very undesirable situation. More desirable nearby development is always adversely affected.

The Natural Valley Farms plant in Saskatchewan Canada used such a lagoon. It processed less than half the number of horses proposed by Unified Equine. They discharged approximately 15 million gallons of fecal /urine waste a year. When they were ordered closed by the Canadian Food Inspection Agency, they abandoned the lagoon with over 30 million gallons of untreated waste, not including blood.

After collecting the blood for resale they found there was no market for it. They were subsequently caught discharging it into the nearby river.

The lagoon system will be less offensive than others in the animal processing industry, and will likely be using aeration in the lagoons, multi-lagoon systems and irrigation of ag production land from the last lagoon. This has been, and is being done around Garden City, KS.

Here Wallis is admitting that other lagoons are "offensive". That is an understatement. Furthermore, the word "likely" indicates that UE has no specific design, no real expertise and makes vague promises that their operation will be different.



The system may include an aquaculture program for the final lagoon.

There is no use of aquaculture to treat equine slaughter waste anywhere in the world. A proper proposal should site specific systems to be employed and show proof they have worked in the past. The word “may” is not an acceptable plan.

Bones will be marketed for use in porcelain production and other purposes.

This conjecture is obviously the product of amateur research. There is only one manufacturer of bone china in the US and they have no shortage of raw materials. A proper proposal would include at least proof of interest from the consuming company. It is unlikely that the manufacturer would risk the negative publicity of making its products from horse bones!

Blood will be collected through a blood processing system for use in pharmaceutical elements and for soil enhancers and fertilizers.

Rendering plants do not accept equine blood because of drug residues. This is the same plan ‘implemented’ at NVF. They eventually began dumping the blood into the river.

Remaining offal will be collected into closed tanks by a regional rendering company that has already agreed to provide this service.

The service should be named. If they have agreed, then they will soon rescind the offer as they did at Dallas Crown, Cavel and Natural Valley Farms. At NVF entrails, heads and other waste were simply spread on the ground and covered by a thin layer of dirt.

A specific tree planting program around the lagoons will “smoke stack” any odors upward out of the normally detected atmosphere around a lagoon system.

Another piece of insubstantial, vague conjecture and with no acknowledgement of the past, as for example, the Chevideco Dallas Crown plant had a screen of trees between it and nearby areas. The strong stench reached for miles around depending upon the breeze.

## Will there be odors or other troubling aesthetic problems?

Horses are naturally clean animals with less smell than other forms of livestock, and all corral and pen odors from manure will be mitigated by good livestock handling procedures that keep this minimized.



One need only ask the nearby hospital, daycare, neighborhoods, doctors' offices, churches, pharmacy, etc. east of Chevideco's Dallas Crown. The smell was overpowering. In an attempt to cover it up, the plant piped bleach around the facility and sprayed it into the air. In a letter, the hospital several blocks away, cited the fact that it was forced to install special air filtration to protect its patients.

The plant itself will not produce any odors that would bother even close neighbors.

An empty promise.

The pens and corrals will be covered, as will all chutes leading into the plant. Casual passers will not see anything that would disturb them, just well cared for horses standing in a corral, or a small pen.

People won't see the nasty part? Is that the plan?

## Where will your employees come from?

The plant will initially employ 40-50 people directly, as well as contract with local small businesses for many of the services and supplies that will be needed. We expect that all employees will come from the local area, we will be providing all necessary training as part of the job.

One can only judge from the past. At Dallas Crown Chevideco depended almost exclusively on Hispanic immigrants, as did Beltex and Cavel. The Dallas Crown employee list, obtained during the lengthy legal battle with the town, tells who will really be hired. When Cavel sued the State of Illinois it could only include a few employees as plaintiffs because (presumably) the majority were undocumented.

Every employee will undergo an extremely detailed and rigorous pre-employment background check.

This statement is an "inoculation" against the proven relationship between slaughter houses and increases in violent crimes, sex crimes and crimes against the family.



Once hired, employees will receive a competitive salary with benefits, and upon becoming vested, also have the opportunity to acquire ownership in the company.

This is all the same fluff they always say to get into a town. Later they do none of it. It reads exactly like the articles interviewing Chevideco management before the opening of their Dallas Crown plant.

## Will the community experience a sudden rise in crime?

Not likely. All employees and contractors will be carefully screened, and most will be established area residents. These will be employees who are well compensated, fairly treated by management, and not likely to be involved in criminal activity.

This is a false promise. In their landmark study *Slaughter Houses and Increased Crime Rates*, Fitzgerald and Dietz (Univ. of Windsor and Michigan State) found that not only did slaughterhouses bring higher incidents of violent and sexual crimes, but they did so consistently. Here is the concluding paragraph of that study.

*In conclusion, despite some limitations, our research makes valuable theoretical and empirical contributions to a developing sociology of the slaughterhouse. This study is the first to test the theories proposed to explain increased crime in slaughterhouse communities,<sup>16</sup> providing evidence that elaborates on the case study research that initially documented increased crime in communities where large slaughterhouses were sited. The inclusion of comparison industries as well as standard predictors of crime rates in our analyses supports the claim that slaughterhouses have a unique and insidious effect on the surrounding communities. Although studies have found that employment in the manufacturing sector in general has suppressant effects on crime (e.g., Lee & Ousey, 2001), this is clearly not the case for the slaughterhouse subsector of manufacturing. Meaningful theoretical and empirical distinctions can and ought to be drawn between slaughterhouse employment and other types of manufacturing employment. In particular, our results lend support to the argument, first articulated by Sinclair, and since elaborated by Beirne, that the industrial slaughterhouse is different in its effects from other industrial facilities. We believe that this is another of a growing list of social problems and phenomena that are undertheorized unless explicit attention is paid to the social role of nonhuman animals.*

When Chevideco's Dallas Crown Plant closed, the crime index for Kaufman Texas dropped from 320 to 135!

- Murders dropped from an average of .5/100,000 to 0.
- Rapes dropped from an average of 6/100,000 to 0.
- Robberies dropped 65%



- Assaults dropped 61.2%
- Thefts dropped 71.2%
- Auto thefts dropped 83.3%

## Will a meat processing facility in our community increase or decrease the property value of our homes?

If there is any direct correlation at all between the presence of a state-of-the-art meat processing facility and home values of the area it is likely to result in an increase in value because of a lower unemployment rate, and more economic opportunity for the community at large.

The historical record proves that this is completely untrue. Despite the fact that Chevideco's Dallas Crown plant was shuttered just before the national crisis in foreclosures and falling property values, the property values in the area actually increased!

## What will the total investment be in the Mountain Grove Community?

We are at the beginning of a Feasibility Study phase that will ultimately determine these numbers, but the total investment will likely be in the \$6 Million to \$7 Million dollar range.

When Natural Valley Farms finally went bankrupt, they had lost over \$42 million dollars, and they complained they had been forced to pollute because they had not had enough money to buy the treatment systems they needed.

## Will the horses you process be the "cream of the crop?" What about abused, neglected, and abandoned horses?

For the Mountain Grove facility, which will be our flagship model for the nation, we will be primarily procuring mature horses that are in good shape, and free of any veterinary medicine residues. We will verify their eligibility for processing through a rigid testing protocol. These horses will be purchased from a variety of sources where the sellers are assured that they will be humanely processed in a regulated facility that is designed for the unique characteristics of the equine species...although the plant will be capable of processing beef, and bison as well...our main focus will be equine. These horses will generally be unsuitable for other purposes for a variety of reasons from being dangerous and untrainable, to being injured or blemished, to simply being undesirable because of conformation problems and the like.



This begs two questions; Who is going to guarantee equines are free of any veterinary medicine residues since the US has no traceability in equines (passport system), and what testing protocol would be used?

The most commonly used med on horses, phenylbutazone (bute), is banned in all food animals and cannot be detected in blood tests – only by assaying the kidneys. Wallis had a group of equine “scientists” (one was a teacher in a community college) come up with this. They are not medical doctors and are not qualified to speak to food safety protocol in humans. Food safety requires proof that the horse is drug free via a system that records meds from birth before they are slaughtered.

Abused, abandoned, neglected, and starving horses will be rejuvenated and brought back to health prior to processing, and any that have prospects for any other purpose will be provided to United Horsemen, a 501c3 nonprofit organization that will market those horses to appropriate uses, or provide them to charitable organizations such as equine therapy programs at no cost.

This is yet another half baked “plan”. Even on its face it makes no sense. UE first claims they are going to slaughter only happy, fit horses and then claims they will rehabilitate horses and either slaughter or re-home them. If re-homing is an option for the rehabilitated horses, then why not for the incoming slaughter horses since they are in good shape to begin with? Slaughter plants are killing factories, not rehab centers. To date United Horsemen has yet to rejuvenate a single horse.

This plant will be set up to primarily provide high quality well produced meat that is sought after by the international marketplace, as well as the domestic gourmet, specialty, health conscious, and value seeking customer. Likely those animals that don't fit this profile as the ideal meat animal will be processed in other facilities that will specialize in serving those markets.

## Isn't horse processing cruel and inhumane?

No. Horses, like all other species of livestock used for food are regulated by the U.S. Humane Methods of Slaughter laws, one of the highest standards for humane handling in the world. This law requires that all animals be handled with a minimum of stress, and that they be humanely killed with a single shot in a manner that ensures instantaneous insensibility.

The law requires it, but it is not enforced and never happens. Every undercover video ever made has found a high percentage of ineffective stuns. In one recent case a draft horse was improperly stunned well over ten times.



There are two methods approved by the American Veterinary Medical Association (AVMA), and the American Association of Equine Practitioners (AAEP) to ensure instantaneous insensibility with a single shot, as is required by U.S. law--gunshot or penetrating captive bolt. USDA Food Safety Inspection Service (FSIS) inspectors are required to be present when any animal is processed for food. This inspection requires examining the live animal prior to processing, ensuring complete and total insensibility before the animal is hung up to bleed out, and examining the carcass afterwards.

This is more nonsense. Antemortem inspections (of live horses) are for the purpose of detecting tumors and diseases that would affect the meat. They are done before the animal gets near the kill box and have nothing to do with insensibility.

At one time the USDA attempted to measure whether three cattle slaughter operations were within specifications (allowable percentage butchered while still conscious). They abandoned the effort after none of the plants could meet the criteria.

Unified Equine, LLC will be utilizing the "[Recommended Handling Guidelines and Animal Welfare Assessment Tool for Horses](#)" developed by the Horse Welfare Alliance of Canada and adopted by the International Equine Business Association. This provides comprehensive, consistent animal welfare standards for the handling of horses at processing. The system will be utilized for third party audits and by the company for guidance, education and in-house assessments. The guidelines offer detailed information about equine behavior and handling, facility design, transport, compromised animals, effective stunning and willful acts of abuse. It is based on the understanding that animal behavior is key to humane livestock handling. When proper handling techniques are used the animals experience less fear and stress and the job of moving animals is easier. Reduced stress also provides for a higher quality end product.

Like leading Canadian horse meat facilities, Unified Equine will be utilizing video surveillance throughout the facility.

*"It is our belief that these tools developed for the welfare of horses will set the standards for the meat processing industry. The program will provide our management and employees with the training and guidance they need to ensure all horses are handled properly," says Claude Bouvry of Bouvry Exports in Alberta, Canada. "The guidelines, along with video surveillance, will bring confidence to our producers and our customers."*

Although there have been claims that the Canadian plants "will" use such a system, there has never been any proof that they do. The only video recordings of Canadian slaughter houses to date have been done by clandestinely installed camera and turned over to the Canadian Horse Defense Coalition for distribution to the press.



Two of the plants have recently made improvements after those cameras documented extreme abuse, but there has been no mention of video supervision. Wallis made a statement at one point that the plant manager would determine what footage would be released. If that is still the case, surveillance would be worthless. The likelihood of the plant manager releasing damaging footage is nil.

## What kind of product will be produced?

The primary product will be fresh and frozen meat.  
The various cuts of horse meat are similar to beef or bison ranging from high end roasts and steaks, to ground meat, and specialty meats.

## Is there a market for horse meat in the United States?

Yes. There was a fairly robust niche market for horse meat in the United States into the early 1990s.

No, it is not sold legally anywhere in the US. The only market is the illegal market in South Florida that is causing constant horse theft.

This is a protein that is utilized by three-quarters of the world's cultures, and there are in fact, more meals of horse meat served every day, world-wide, than there are MacDonald's hamburgers. China is the largest consumer, followed closely by Mexico who uses 50% of their production of horse meat at home, the other half is exported. It is available in the French speaking areas of Canada. It is used in the Caribbean and South America. There is a thriving market in other parts of Asia. Obviously, this country is full of people from all of these cultures, and the ethnic communities in major cities are welcoming our re-introduction of horse meat such as the Tongan population in Salt Lake City, the Mongolian populations in Seattle and Washington D.C., and many more.

You could buy a horse steak at the dining room at Harvard in the 1980s, and there was a successful horse meat business on both the East and West Coasts throughout that decade. Many ranch families butcher a filly or two a year for their own use today. And we are currently importing nearly 400 tons of horse meat from Canada for zoo and circus diets today.

Harvard was an anomaly. Moreover, the end customers for the meat are of no importance to the people of Mountain Grove.



There are essentially three reasons why consumers choose horse meat:

**Gourmet** - horse meat is a delicious meat prized by culinary aficionados that is often described as dark red, sweet, and similar to elk or bison.

**Health Conscious** - horse meat is a lean, nutritious meat that contains 50% more protein, 40% less fat, high in iron and other nutrients, and has up to 18 times the Omega-3 fatty acids of beef. It is sought after by athletes, and mothers as baby food in places like Japan and Italy.

There is no way to guarantee food safety in US horses without a traceability system. Unlike livestock, horses frequently have multiple owners and no system to track the horses.

**Value Conscious** - in every country where horse meat is commonly used today it is generally 40% less in cost than beef so it represents a good value for those seeking to feed their families on a tight budget.

In the EU it is of comparable cost to veal. Horse meat sells for \$20 - \$40 per pound in Europe.

## Best case scenario...when will Unified Equine be in operation?

This Feasibility Study phase wherein we are nailing down details and ensuring that our well-developed business model fits the available resources in the Mountain Grove area, is anticipated to take a couple of months.

Once that is complete, and assuming there is a positive outcome we would move into full business development, construction, and implementation stages.

If everything goes right, and not much goes wrong, we could be in business in September, 2012.

This is the third time Sue Wallis has gone public with such plans and such time estimates. In Wyoming she claimed to be prepared to use the Cheyenne Stock Yards for such a system. She then shifted her plans to include a mobile slaughter house. She claimed they would slaughter horses for zoo meat. In the end it all came to nothing.

The entire proposal is nonsense! It would take at least two years even if all the license issues went well. There are also the USDA requirements for the environmental assessment and other requirements outlined in the HSUS letter to USDA before they can fund inspections.

