



HOUSE OF COMMONS
CHAMBRE DES COMMUNES
CANADA

Alex Atamanenko, MP
BC Southern Interior
House of Commons
Ottawa, ON K1A 0A6
Tel: 613-996-8036
Fax: 613-943-0922

March 31, 2014

Mr. Al Patterson, President
Equine Canada
100-308 Legget Drive
Ottawa, ON K2K 1V6

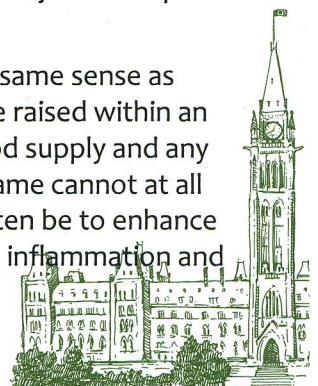
Dear Mr. Patterson,

Thank you for your 19 March letter in which you raise the concerns of Equine Canada (EC) in regard to my Bill C-571, which is coming up for debate in the House of Commons. I appreciate that you have an interest in any legislation that stands to affect those of your members who presently rely on the slaughter option to dispose of their horses. Furthermore, I am mindful of the support and recognition EC receives from Agriculture and Agri-Food Canada as well as its role in enabling the present slaughter system to flourish.

To begin, I would like to assure your members that prior to moving forward with Bill C-571, I made every effort to understand the various aspects of the horse industry as well as the logistics involved at every point in the slaughter system. I have read expert testimonies presented to the US Congress that led to the complete shut-down of the US slaughter industry in 2007 and followed along as pro-slaughter factions failed repeatedly in their arguments to convince Congress to re-open it. I have carefully considered the often heard justification that without slaughter, horse abuse and abandonment would become epidemic. I have compared the regulations governing horse slaughter between Canada, the EU and the United States. The introduction of Bill C-571 is the result of my coming to the conclusion, based on considerable research, that there is no justification for allowing the Canadian slaughter industry to continue operating under the current regulatory regime.

I note by your recent position statement to members that EC is neither encouraging nor discouraging comments to government on C-571 out of respect for their various views on the slaughter issue. By this I understand it to mean that when EC speaks in favour of processing horses for human consumption it is not representing the views of all its members. I would very much welcome any surveys that EC has undertaken regarding general attitudes among your members towards slaughter. It would be useful to see some indication of the level of support among your members for non-slaughter options that would provide for those horses currently being sent to slaughter. Information regarding the use of medications by your members and the level of consideration that is given to the possibility that their horse(s) may at some point enter the human food chain would also be of great interest.

I disagree with your position that horses should be regarded as multi-use livestock in the same sense as cattle, sheep or goats. Animals that are raised for food, such as cattle sheep or goats, are raised within an agriculture industry where there is an intention from birth that they will end up in the food supply and any medications administered will be in accordance to food standards and regulations. The same cannot at all be said about horses where the prime consideration for drug administration will more often be to enhance or maintain performance in a variety of sporting careers where injuries, strained muscles, inflammation and



breathing difficulties are commonplace. Given the plethora of routinely administered legal (and illegal) equine veterinary drugs, which carry serious and idiosyncratic implications to human health at the minutest levels, horses cannot be regarded in the same light as other food animals.

The definition of "livestock" by various Canadian authorities has been tailored and enacted for a variety of specific purposes. It cannot be concluded that every definition of "livestock" across Canadian authorities should necessarily include horses, regardless of the purpose of the authority. Even if the general purpose of the authority is for export or taxation it is still not appropriate to automatically group horses with other livestock. Different considerations will always be relevant for different types of livestock, be they cattle, horses, swine or honeybees. The differences between horses, cattle and other animals, the reasons for which they are raised and the treatments they commonly receive during their lifetimes completely justifies differences in the way their meat products are regulated. In any event, I do not see provincial and federal authorities moving in your favoured direction any time soon.

I would like to assure you that I worked closely with the House of Commons legal services in drafting Bill C-571 to ensure there were no provincial or international trade implications or conflicts that could arise with its enactment. Furthermore, Bill C-571 does not imply a responsibility for people to declare or report why they are moving horses inter-provincially any more than existing section 8 of the Meat Inspection Act implies a responsibility for people to declare why they are moving from one province to another products that might be confused with "meat products" but which are not actually "meat products", within the definition in that Act. It is quite incorrect for EC to communicate that C-571 implies a proactive reporting requirement for horses other than those that are slaughter-bound for human consumption.

As you have correctly noted, C-571 would require that horses be raised primarily for human consumption, and that a lifetime medical record in chronological order accompany any horse presented for slaughter. That such a regime is not in place today in any sector of the Canada horse industry is precisely why I introduced and have chosen to move forward with Bill C-571. You have stated incorrectly, however that no such record keeping takes place for horses in other countries. The EU, Canada's main market for horsemeat, requires that all horses have a passport by six months after the horse's birth or by December 31st of the year of its birth, within which the horse's lifetime medical record must be maintained. Because of the risk to human health presented by common equine drugs any UK passport issued to a horse after six months of age is automatically declared as ineligible for the food supply. Bill C-571 would require a system to that end be implemented if horse slaughter is to continue. Furthermore, there are reasons to believe that the EU will soon be making demands for Canada to bring its regulatory requirements closer to EU standards in the near future.

I find it troubling that, as an Equine Association concerned with the welfare of horses, you have resorted to the discredited argument that restricting the slaughter industry will result in increased horse neglect and abandonment. The US GAO report you have cited as supporting this argument has been exposed as having misrepresented or omitted relevant data to conclude an increase in abuse and abandonment following the closure of US abattoirs. To state the obvious, since slaughter continued to be available in Canada and Mexico, any rise in reported cases of abuse would necessarily have come from other factors. A critical analysis of the GAO report entitled "How the GAO deceived Congress" makes it glaringly obvious that little credence should be attributed to such a flawed report. The peer-reviewed study by John Holland, 'THE HISTORY AND CAUSES OF EQUINE ABUSE AND NEGLECT: A Statistical Analysis', found a strong statistical correlation to higher prices for hay and alfalfa as well as economic downturns and unemployment. Strong evidence was provided in this study that revealed it was actually the availability of slaughter that contributed to increased cases of reported abuses and it was also shown that in no cases did it ever reduce it. In any event, animal abuse is a criminal activity that should be enforced under existing law. It is not in any way a justification upon which to risk the safety of the food supply.

I have been following with great interest the ongoing efforts to develop the CanEQUID ID system. It would appear however, that little progress is being made. It seems to me that such a scheme is somewhat lacking in feasibility given the relatively small percentage of owners who presently avail themselves of the slaughter option. Certainly, the system would have to have value in other respects before one could expect all owners to buy in to a traceability system that would have to include lifetime medical histories for slaughter purposes. The attitude in the US is such that every attempt to reopen the slaughter industry has been resoundingly defeated. The idea that Americans would buy in to an RFID or other scheme, given their unwillingness to even fund inspections at abattoirs, seems highly questionable. For that matter, in this age of austerity and cutbacks, should Canadian tax payers really be asked to allocate scarce resources to properly enforce such a scheme when so few actually do or ever would eat horsemeat?

Bill C-571 is intended to provide a clear distinction between horses that are and horses that are not raised for the human chain. That such a distinction is not already recognized by statute is a profoundly irresponsible policy approach that has been taken by our government. That the EU permits meat from US horses to enter its jurisdiction via Canada when it will not permit the US to do so from within its own borders contrary to EU food safety and transparency laws is inexplicable. It is my hope that you will share my response with your members and I would be interested in any feedback they may have.

Sincerely,



Alex Atamanenko, MP
BC Southern Interior

CC: Honourable Gerry Ritz, P.C., M.P. – Minister for Agriculture and Agri-Food
Malcolm Allen, MP – (NDP) Official Opposition Critic for Agriculture and Agri-Food
Mark Eyking, MP - Liberal Party Agriculture & Agri-Food critic
Honourable Rona Ambrose, P.C., M.P. – Minister of Health
Libby Davies, MP - (NDP) Official Opposition Health Critic
Hedy Fry, MP – Liberal Party Health Critic
Elizabeth May, MP – Green Party Leader
All Media