



THE FEDERATION OF SPCAs AND HUMANE SOCIETIES
FÉDÉRATION DES SOCIÉTÉS D'ASSISTANCE AUX ANIMAUX



BRIEF TO THE

HOUSE OF COMMONS STANDING COMMITTEE ON

AGRICULTURE AND AGRI-FOOD

ON

BILL C-355: Prohibition of the Export of Horses by Air

for Slaughter Act

Submitted by:

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THE FEDERATION OF SPCAs AND HUMANE SOCIETIES
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To: Members of the House of Commons Standing Committee on Agriculture and Agri-Food Re: Bill C-355, Prohibition of the Export of Horses by Air for Slaughter Act

Introduction

Humane Canada is the national federation of SPCAs and humane societies, representing organizations in every province and 2 territories, in rural and urban centres. We drive positive, progressive change to end animal cruelty and improve animal protection through the enactment of effective legislation. Approximately 25% of Canadian Humane Societies and SPCAs are empowered to enforce provincial and federal legislation pertaining to animal cruelty and abuse. Collectively, these organizations investigate tens of thousands of complaints every year. Humane Canada members have enforced the law for more than a century. This experience provides Humane Canada with a unique perspective into the issue.

Humane Canada has a long history working to advance the welfare of farmed animals through legislation, regulation and standards. For 40 years, Humane Canada has worked alongside the agriculture industry to develop Canada's Codes of Practice for the welfare of farmed animals – in the last fifteen years, under the auspices of the National Farm Animal Care Council (NFACC). As a founding member of NFACC, we sit on Code Development Committees for many species, including Equine, alongside industry and government to advocate for continual improvements to the standards of care for farmed animals that are included in these Codes, which are referenced in several provinces' animal protection legislation.

Comments on Proposed Bill C-355

Humane Canada holds that from birth to death, farmed animals must be protected from both physical and psychological suffering.

Humane Canada insists that the methods used to kill any animal must be humane. A humane death is defined as one that occurs when animals are killed in a manner where they die instantly, without panic or pain, or are rendered irreversibly unconscious until death ensues. A humane death also means the handling methods, equipment and facilities used must be appropriate to the species and condition of the animal, and levels of animal fear, pain and anxiety are kept to an absolute minimum prior to and during killing.

While Humane Canada recognizes that horses are slaughtered for the meat market, for that slaughter to be considered humane, slaughter plants and government regulators must provide

evidence that the facilities and methods used are appropriate for horses and meet the requirements above.

With regard to transportation, Humane Canada holds that no animal should be transported in a manner that is likely to cause suffering. This requires consideration of environmental conditions to which they are exposed, that containers and handling must be appropriate to the species, and that animals being transported together must be compatible, among other factors. Given that transportation is the most distressing time in a farmed animal's life, transportation should be minimized, and journeys should be as short as possible.

Because the live export of horses via long-distance flights for slaughter cannot meet these requirements and due to the inherent risks to animal welfare, Humane Canada is unable to support this practice.

Issues:

1. Feedlot Risks

Whether animals are raised for agricultural production or companionship, they are all sentient beings capable of experiencing pain, suffering and fear, who deserve to be treated humanely and with respect. The recognition of animal sentience is the foundation of animal welfare improvements¹ and is becoming increasingly central to globalized animal trade.²

It has been documented that horses who are purpose-bred to be slaughtered are raised in feedlots that lack adequate protection from environmental elements.³ Under the section 2.1.2 of the NFACC Equine Code of Practice, the requirements for shade and outdoor shelter for horses include access to shelter (constructed or natural) that protects them from the harmful effects of extreme weather conditions and prompt assistance for individual horses that are showing signs of heat or cold stress.⁴ Horses who are shipped by air are sent from Alberta and Manitoba,⁵ two provinces that have among the harshest and coldest weather conditions in Canada. Like companion horses, draft horses must be provided with appropriate shelter in extreme weather conditions.

¹ https://www.researchgate.net/publication/335906348_Animal_Sentience_and_Welfare_An_Overview

² <https://www.mdpi.com/2076-2615/12/23/3416>

³ <https://winnipeghumanesociety.ca/16-animal-welfare-risks-associated-with-horse-exportation-for-slaughter/>

⁴ <https://www.nfacc.ca/codes-of-practice/equine-code#section2>

⁵ <https://www.cbc.ca/news/canada/edmonton/horsemeat-industry-live-exports-ban-canada-1.6987841>

2. **Transport-Specific Risks to Horses**

The process of shipping live horses for slaughter via long distance flights raises many welfare concerns due to the nature of the animal. Horses have a strong flight instinct, and those who are raised for food are not trained or conditioned for transportation.⁶ The long periods of travel, extended exposure to stress due to intense, unfamiliar stimuli and disorientation, and extreme temperatures that are common in long-haul flights pose serious welfare risk to these animals.⁷ The *Health of Animals Regulations* set out requirements for loading, containing and transporting horses, including a maximum limit for feed, safe water and rest intervals at 28 hours⁸, as well as for overcrowding, which is defined as the condition when an animal cannot maintain their preferred position or adjust their bodies to protect themselves from injury or where the animal is likely to suffer.⁹

Withholding food and water from horses for intervals longer than 24 hours has been scientifically proven to cause dehydration and increased risk of injury from fatigue for the animals. Although horses are permitted to travel up to 28 hours without food, water or rest as outlined in the federal regulations, studies show that any transportation time frame nearing 24 hours is enough to make horses physically compromised.¹⁰ Crates used in transporting horses by air house these large animals in groups and make it impossible for them to lie down and rest or attempt to protect themselves from falling¹¹ over the duration of the flight and landing.

Transportation begins as soon as an animal is loaded into their container, so any minor delay makes it very easy to violate the current time allowance of 28 hours, forcing the animals to endure even longer stretches of time without food, water or rest and jeopardizing their physical wellbeing. The *Health of Animals Act* and *Regulations* provide details on how to mitigate some forms of distress that horses experience during transport.¹² Even with complete compliance with the required regulations, due to the nature of shipping live horses long distance by air for slaughter and consumption, exposure to a variety of stressors is unavoidable. As a result, horses will continue to suffer during air transportation, despite attempts to alleviate the harm these animals experience.

⁶ <https://www.ctvnews.ca/w5/a-glimpse-inside-canada-s-sinister-horse-meat-industry-1.5324002>

⁷ <https://www.cbc.ca/news/canada/manitoba/horses-export-slaughter-humane-society-1.5909914>

⁸ Health of Animals Regulations, CRC, c 296, s 152.2(1)(c): <https://canlii.ca/t/7wdv#sec152.2>

⁹ Health of Animals Regulations, CRC, c 296, s 148(2)(a), (c): <https://canlii.ca/t/7wdv#sec148>

¹⁰ <https://academic.oup.com/jas/article-abstract/78/10/2568/4625650?redirectedFrom=fulltext>

¹¹ <https://www.ctvnews.ca/w5/a-glimpse-inside-canada-s-sinister-horse-meat-industry-1.5324002>

¹² <https://inspection.canada.ca/animal-health/terrestrial-animals/humane-transport/health-of-animals-regulations-part-xii/eng/1582126008181/1582126616914?wbdisable=true#a11>

3. Handling and Operator Factors

In addition to the numerous welfare concerns arising from transport conditions and the length of time horses are deprived of food, safe water and appropriate rest in transport, problems can occur with respect to handling of the horses throughout their journey from the time they are first loaded until they have arrived at their destination.

The International Federation of Horse Racing Authorities (IFHA) published Transportation Welfare Guidelines in June 2023 for thoroughbred horses, who enjoy superior treatment¹³ to their counterparts being shipped by air for slaughter. The Guidelines list a number of risks that can occur during transportation, which include:

- Poorly trained handlers who may be ignorant of the requirements for safe and humane transportation and detection of the early signs of abnormalities such as colic, travel sickness or heat stress;
- Incidents occurring during travel that may be beyond the direct control of the operator but for which contingency plans and emergency procedures have not been prepared and/or implemented;
- Unreasonable deadlines imposed because of financial pressures and/ or poor planning; and
- Adverse conditions within the transport vehicle that occur or are permitted to develop.¹⁴

This is a sample of the full list available on IFHA's website and represents issues that may be more likely to occur at the destination airport.

4. Welfare at Slaughter Risks

Canadian regulations do not apply in the jurisdictions where horses are shipped to. Once horses arrive in their destination country, it is difficult to obtain accurate records on their care and slaughter. There are also no records indicating when horses are provided with fresh water and food once they arrive, putting the permissible 28-hour period without food or water further in doubt.

¹³ <https://horsesport.com/horse-news/air-canada-cargo-launches-equine-transportation-service/>

¹⁴ The Risks of Horse Transportation: https://ifhaonline.org/resources/Transportation_Welfare_Guidelines.PDF

Conclusion

In conclusion, Humane Canada holds that from birth to death, farmed animals must be protected from both physical and psychological suffering, that no animal should be transported in a manner that is likely to cause suffering and that the methods used to kill any animal must be humane. The export of live horses overseas for slaughter cannot meet these animal welfare science-informed requirements and therefore is not humane and cannot be made humane for the species.

It is because of the extensive animal welfare risks of long-distance transport for slaughter that several countries have implemented stronger approaches than Canada, are reviewing their requirements, or are moving towards banning the practice. The Canadian government could join them and demonstrate similar leadership by listening to their constituents who are opposed to the long-distance export of horses by air for slaughter (noting that 74% of poll respondents are from Alberta¹⁵) and passing Bill C-355.

Humane Canada respectfully urges committee members to support this Bill.

Sincerely,



Barbara Cartwright

CEO

¹⁵ https://researchco.ca/wp-content/uploads/2021/02/Release_Horses_CAN_18Feb2021.pdf#:~:text=Vancouver%2C%20BC%20%5BFebruary%2018%2C%202021%5D%20%E2%80%93%20The%20export,while%2022%25%20support%20it%20and%2012%25%20are%20undecided.



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About Humane Canada

Humane Canada, formerly known as the Canadian Federation of Humane Societies, is the only national organization representing humane societies and SPCAs in Canada. We drive positive, progressive change to end animal cruelty, improve animal protection and promote the humane treatment of all animals.

Our 50 member organizations (listed below) include societies in every province and two territories. These are the very organizations that Canadians have depended upon, not only to care for abused and abandoned animals, but also to advocate for greater care and protection of animals and to provide community resources, research, and humane education. Humane Societies and SPCAs are among the oldest and most trusted social institutions in the country.

Humane Canada has worked alongside government and the agriculture sector for more than 40 years to improve animal welfare standards on farm, in transit and at slaughter. We advocate for sound, animal welfare science informed, standards of care and when necessary for the end to practices that cannot be made humane.

Humane Canada Member Organizations

Alberta Animal Rescue Crew Society	Georgian Triangle Humane Society	Ottawa Humane Society
Alliston and District Humane Society	Guelph Humane Society	Prince Edward Island Humane Society
Animatch	Hamilton Burlington SPCA	Regina Cat Rescue
Association of Animal Shelter Administrators of Ontario	Happy Valley Goose Bay SPCA	Regina Humane Society
BC SPCA	Humane Society Dawson	Saskatchewan SPCA
Burin Peninsula SPCA	Humane Society Hastings Prince Edward	Saskatoon SPCA
Burlington Humane Society	Humane Society Kawartha Lakes	Sault Ste. Marie & District SPCA
Calgary Humane Society	Humane Society London & Middlesex	Société protectrice des animaux de Québec
Canadian Association for Humane Trapping	Humane Society of Greater Niagara	Southwest Coast SPCA
Central Alberta Humane Society	Medicine Hat SPCA	SPA de l'Estrie
Charlotte County SPCA Inc.	Miramichi SPCA	SPCA de L'Outaouais
Cochrane & Area Humane Society	Montreal SPCA	St. Johns SPCA
Edmonton Humane Society	New Brunswick SPCA	The Humane Society of Kitchener Waterloo & Stratford Perth
Exploits Valley SPCA	Northwest Territories SPCA	Thunder Bay and District Humane Society
Fort McMurray SPCA	Nova Scotia SPCA	Toronto Humane Society
Fredericton SPCA	Oakville & Milton Humane Society	Victoria Humane Society
Gander & Area SPCA	Ontario SPCA & Humane Society	Windsor Essex County Humane Society
	Oromocto & Area SPCA	Winnipeg Humane Society



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