

BRIEF TO STANDING COMMITTEE ON AGRICULTURE AND AGRI-FOOD
TOPIC: BILL C-355, THE PROHIBITION OF THE EXPORT OF HORSES BY AIR FOR
SLAUGHTER ACT

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Standing Committee on Agriculture and Agri-Food
Sixth Floor, 131 Queen Street
House of Commons
Ottawa ON K1A 0A6

Via email

Dear Chair and Committee Members,

Re: Bill C-355, the *Prohibition of the Export of Horses by Air for Slaughter Act*

We write to you as veterinarians and animal welfare experts to express our support for Canada's commitment to ending the export of live horses for slaughter overseas as reflected in Bill C-355.

Canada exports 1,700-2,600 horses overseas each year for slaughter, most commonly to Japan. The journey by land and air from remote feedlots in western Canada to feedlots in Japan generally takes more than 24 hours, during which time the animals are denied food, water, and rest. As explained below, the conditions in which horses exported for slaughter are transported cause significant physical and psychological suffering to horses. Horses travelling by air can experience moderate to severe suffering in many forms, including anxiety, fear, pain, exhaustion, physical discomfort, auditory discomfort, hunger, thirst, and panic.¹ There is strong scientific evidence to support banning this practice for animal welfare reasons.

It is important to be clear that the conditions under which horses are exported for slaughter – and, by extension, the associated risks to their health and wellbeing – are markedly different from sport horses transported by air for other purposes. This is because horses transported for slaughter (a) are subjected to higher stocking densities and are confined in smaller spaces, (b) are provided less supervision and intervention during flights as well as medical care before, during, and after transport, (c) are subjected to different handling styles prior to and during transport and are denied access to water, (d) are more likely to be confined with other unfamiliar and potentially incompatible horses, and (e) have less training and habituation to travel.

Transport overseas by air

The sound of the aircraft engine, changes in altitude and air pressure, and unsteady motion are all significant sources of auditory discomfort, anxiety, and fear for horses transported by air. Takeoff and landing – which involve loud noises and during which horses commonly struggle repeatedly to maintain balance and can hit and kick the sides of their wooden crates – are particularly stressful for horses, though it is notable that their heart rate commonly stays elevated throughout the duration of a flight.²

¹ See, e.g. T.H. Friend, “A review of recent research on the transportation of horses”, *Journal of Animal Science* 79:32-40 (2001) [Friend, 2001]; N. Waran et al, “The effects of transportation on the welfare of horses” *The Welfare of Horses* (Springer, Dordrecht: 2007) at pp125-150.

² B. Nivelles et al, “Horse transport to three South American horse slaughterhouses: A descriptive study”, *Animals* 10(4), 602 (2020) [Nivelles]; P. McGreevy et al, “Using the five domains model to assess the adverse impacts of

In comparison to other farmed animals, horses have a high centre of gravity, making them particularly susceptible to imbalance during acceleration, deceleration, and turbulence. For horses flown to Japan, risks associated with takeoff and landing are compounded by the fact that their flights must stop to refuel before crossing the Pacific Ocean.

The length of their journey may also put these horses at risk of respiratory and/or gastrointestinal problems.³ For instance, long-distance transport is a risk factor for the development of pleuropneumonia (also known as “shipping fever”) – a serious lung infection that causes fever, malaise, and abnormal breathing and heart rate, and which is considered to be stress-induced.

Because testing is costly and data from Japanese feedlots is unavailable, the percentage of horses exported from Canada for slaughter who ultimately develop this disease is unknown but given the lengthy travel and stressful conditions they endure, their level of risk is high.

Long-distance travel can cause a stress response and suppressed immune system in horses.⁴ In fact, recent scientific research in *Equine Disease Quarterly* shows clearly that even short road trips of under 3 hours can affect horses’ endocrine and immune function.⁵ Furthermore, having to repeatedly struggle to maintain balance, dehydration, injury, and other forms of distress during transportation also puts horses shipped overseas for slaughter at risk of developing colic – a condition that causes abdominal pain.⁶

Prolonged lack of access to food and water

Denying horses exported for slaughter access to food and water for more than 24 hours can cause hunger and distress given that horses naturally graze for 8 or more hours per day and they can become dehydrated on long haul flights after just 10-15 hours.⁷ Horses transported for over 24 hours are likely to be markedly to very severely dehydrated – a condition that can be compounded by high ambient temperature and/or humidity.

Lack of training/habituation to travel

Because horses bred and shipped for slaughter are generally not trained or habituated to travel, the journey overseas – including the loading and unloading process in particular – can be

husbandry, veterinary, and equitation interventions on horse welfare” *Animals* Mar;8(3):41 (2018) [McGreevy]; J. Thornton, “Effect of the microclimate on horses during international air transportation in an enclosed container”, *Australian Veterinary Journal*, 78(7) (2000) at pp472-477; M. Stewart et al, “The effects of air transport on the behaviour and heart rate of horses”, *Applied Animal Behaviour Science*, Feb 2;80(2) (2003) at pp143-60 [Stewart].³ International Federation of Horseracing Authorities, “Transportation Welfare Guidelines” (2014) [IFHA]; B. Padalino et al, “Health problems and risk factors associated with long haul transport of horses in Australia”, *Animals* 5(4) (2015) at 1296-1310.

⁴ B. Padalino et al, “Immunological, clinical, haematological and oxidative responses to long distance transportation in horses”, *Research in Veterinary Science* Dec 1;115 (2017) 78-87.

⁵ <https://www.horsetalk.co.nz/2023/10/23/road-trips-horses-endocrine-immune-function/>

⁶ L. Vermeulen et al, “A review: Today’s practices about the fitness for travel on land of horses toward the slaughterhouse”, *Journal of Veterinary Behavior*, Jan 1; 29 (2019) at 102-7 [Vermeulen].

⁷ Stewart, *supra* note 2. See also Friend, 2001, *supra* note 1; C.L. Stull, “Responses of horses to trailer design, duration, and floor area during commercial transportation to slaughter”, *Journal of Animal Science* 77(11) (1999) 2925-2933; T.H. Friend et al, “Stress responses of horses during a long period of transport in a commercial truck”, *Journal of the American Veterinary Medical Association*, 212(6) (1998) at 838-844.

expected to cause particularly severe anxiety, fear, and panic. Loading and unloading for air transport causes significant stress because horses are intrinsically fearful of entering dark and enclosed spaces, and the horses are in totally unfamiliar surroundings characterized by noise, the presence of other fearful horses, unfamiliar handlers, and lifting by hydraulic machinery that impacts their balance.⁸

Workers unloading horses at Canadian airports to be shipped overseas for slaughter have repeatedly been documented using harsh and inappropriate handling techniques, including the use of sticks or poles to jab horses in trucks at the loading dock. Such methods are known stressors for horses, the use of which can cause increased loading times, higher frequency of stress-related behaviour, and heightened risk of injuries.⁹

Confinement in small wooden crates

After 28 hours of transport – the legal maximum under the Health of Animals Regulations – horses show extreme fatigue.¹⁰ The wooden crates in which these horses are held prevent them from moving freely, turning around, lying down, and resting. Transport in a confined space can be particularly aversive and can cause significant fear. The longer the journey, the more tiring and stressful it is for horses to constantly brace and adjust their position in response to aircraft and truck movements.¹¹ All of these risks are compounded for horses exported for slaughter because they are transported in groups, prevented from freely raising and lowering their heads, and by virtue of their crates are prevented from taking steps to adequately compensate for changes in inertia forces.¹²

In contrast, Air Canada’s transportation service for sport horses uses stalls specifically designed to transport “prized horses” in a safe and humane manner, including accommodation for attendants to enable frequent checking on animals and to provide water and care throughout their journey.¹³

Horses shipped overseas for slaughter are commonly confined with other unfamiliar horses, some of whom may be incompatible – a factor known to contribute to anxiety and fear and which increases risks of disease as well as injuries caused by fighting and aggression.¹⁴ Loading horses into small spaces together puts them at risk of physical injury by knocking into one another and hinders or prevents horses from standing up following a fall.¹⁵ Finally, the presence

⁸ Vermeulen, *supra* note 6; Stewart, *ibid*; G.C. Miranda-de La Lama et al, “Livestock transport from the perspective of the pre-slaughter logistic chain: A review”, *Meat Science* 98(1) (2014) at 9-20, D.L. Ferguson et al, “Loading the problem loader: The effects of target training and shaping on trailer-loading behavior of horses”, *Journal of Applied Behavior Analysis* 34(4) (2001) at 409-423.

⁹ Nivelle, *supra* note 2; B. Padalino et al, “The implications of transport practices for horse health and welfare”, *Frontiers in Veterinary Science* Apr 21; 7 (2020) 202.

¹⁰ Friend, 2001 *supra* note 1.

¹¹ G. Giovagnoli et al, “Transport stress in horses: an electromyographic study on balance preservation”, *Livestock Production Science* 73(2-3) (2002) at 247-254.

¹² Nivelle, *supra* note 2.

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

¹⁴ Nivelle, *supra* note 2; McGreevy, *supra* note 2; M. Oertly et al, “The accuracy of serum amyloid A in determining early inflammation in horses after long-distance transportation by air”, *Journal of Equine Veterinary Science* (2021) 97; IFHA, *supra* note 3.

¹⁵ Friend 2001, *supra* note 1.

of fearful horses vocalizing their distress can contribute significantly to other horses' fear and anxiety when confined in a plane.¹⁶

Risk of physical injury

Some horses have been shown to collapse and/or experience injury and even death during transport by air for slaughter. More than a dozen horses are known to have died during transport from Canada for slaughter overseas, with one dying as recently as 2020. However, it is important to note that horses can experience suffering and distress even in the absence of physical injury or death.

Conclusion

While the *Health of Animals Act* and regulations provide some protection for horses during transport, they do not prevent horses from experiencing some of the most severe negative affective states during transit. Because there are significant stressors inherent in the transportation of horses from Canadian feedlots overseas for slaughter, it is not possible to continue this practice without causing significant animal suffering.

Yours truly,

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¹⁶ Stewart, *supra* note 2.

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