

From: [Paul Littlewood](#)

Sent: Friday, May 01, 2015 4:01 PM

To:

Subject: Re: Live Horse Shipments to Japan

Dear _____,

Thank you for your email regarding horses being exported to Japan for slaughter. I appreciate the time you have taken to write with your questions and sincerely apologize for the delay in addressing your concerns.

Animal welfare is an important issue for the Government of Canada and I want to assure you that the CFIA takes all allegations of animal welfare violations seriously and follows-up to verify compliance with the Health of Animals Regulations and the Meat Inspection Regulations.

Laws and standards are in place in Canada to protect the welfare of animals. The federal government shares the responsibility for these laws and standards with the provincial/ territorial governments and the private sector, which includes the various industries and producer organizations involved with animal agriculture. Canada's federal and provincial/territorial governments, the agriculture industry and producers all participate in the ongoing task of updating and improving the legislative requirements and guidelines for animal welfare.

You are correct that CFIA regulations contain a requirement that horses over 14 hands high are to be segregated. However it may be determined that it is better that draught horses are not segregated in order to meet the intent of other sections of the Regulations, which require the animal to be transported in a manner that avoids injury or undue suffering and provides sufficient floor space. Allowing the horses to travel together is often desirable and meets the intent of these other sections. This commonly occurs with draught horses which already know each other and would therefore experience less stress during transport if able to interact socially. Since these horses are social animals that prefer to travel with other horses, CFIA staff routinely assess the stature (height and size) and demeanour of animals intended to be transported together to determine if they are compatible. The CFIA verifies that animals which are incompatible by nature, regardless of their height, are segregated.

While all sections of the Regulations are to be adhered to for the welfare of horses when transported, one section does not take precedence over the other. Each shipment of live animals is unique and the standard that is applied requires considerable professional judgement on the part of the CFIA staff, taking into consideration animal and environmental factors based on previous experiences. CFIA staff who conduct inspections on-site at the Calgary airport are confident that the horses have adequate headroom during each flight. This judgement also takes into account the expectations of the importing country with respect to the treatment of animals during transport and their animal health and welfare upon arrival. The CFIA staff must also verify that the transporter has also provided proper ventilation and adequate construction of the aircraft and crates that are strewn with sand or shavings and fitted with safe and secure footholds for the horses.

The CFIA is not aware of any injury or undue suffering due to lack of segregation of horses over 14 hands in height. The shipping conditions for these horses provide sufficient headroom to allow them to assume a natural position during transport.

The CFIA has been mandated to ensure all horse shipments have been inspected by a CFIA veterinarian prior to export by air and to enforce the Regulations by verifying that all animals, including horses, are properly certified, fit to travel and transported in a humane manner that does not cause injury or undue suffering. With regards to horses being shipped to Japan, all slaughter horses are inspected by CFIA inspection staff prior to export by air, to verify compliance with the Regulations, as required by section 19 of the Health of Animal Act. Under the Health of Animals Regulations humane transportation provisions, the CFIA staff are mandated to verify that the requirements for floor space and headroom, segregation, feed and water, which have been in place since the 1970s, are adhered to.

In order to verify the health and welfare of the horses, a CFIA staff is present at numerous stages during this process. This includes testing of the animals prior to shipment as well as overseeing the loading of the animals into trailers at the farm, into the crates at the airport and the loading of the crated horses onto the aircraft. During the flight an attendant, supplied by the exporter, that has experience in dealing with and handling horses is present.

At the airport, there is no fixed time that the crated horses may be on the tarmac. The horses are loaded into crates prior to the flight to allow sufficient time for the Load Master to plan the loading to ensure proper weight distribution in the aircraft. Prior to the flight the horses remain outside the aircraft in the crates to avoid undue suffering from overheating, as they are accustomed to being outdoors. During adverse weather conditions the crated horses are kept indoors until loading. CFIA is unaware of any incidents where the crated horses have been exposed to flying debris from jet blast and in the winter, spray back from de-icing liquid.

Flights to Japan are generally 16-18 hours in duration, including a stop-over for refuelling. The regulations establish the requirements for provision of food, water, and rest at specific intervals. For horses, the time without food and water is not to exceed 36 hours. These horses are fed and watered prior to being loaded at the farm and spend less than 24 hours in transit. This is well within the 36 hours provided for in the regulations. Air transport of horses to Japan has been occurring in excess of 15 years.

The CFIA has no authority to monitor or enforce compliance with our regulations at destinations in another jurisdiction. Currently there are no regulatory requirements for importing countries to report back to CFIA, regarding the condition of the horses upon arrival in the country of destination. CFIA is not aware of any horses that died due to negligence. CFIA is aware that some horses have died during transport. This was thoroughly examined by local inspection staff and the Air Transport Working Group to improve the protocols and reduce the likelihood of a reoccurrence.

CFIA staff work diligently to enforce the Health of Animals Act and regulations, as mandated, to ensure that all animals, including horses, are properly certified, fit to travel and transported humanely in a way that does not cause injury or undue suffering. CFIA will continue to monitor

all future shipments of horses through pre-embarkation inspections and feedback from the transport companies after arrival in Japan. Any injury or death reported to CFIA will continue to be investigated by local inspection staff and the Air Transport Working Group. If it is determined that the injury or death occurred due to negligence, appropriate corrective action will be taken and protocols will be improved to reduce the likelihood of a reoccurrence.

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 our actions to reinforce this position.

Sincerely,

Paul K. Littlewood

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