

CQHA

CANADIAN QUARTER
HORSE ASSOCIATION

ACQH

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DE QUARTER HORSE

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February 7, 2017

Honorable Lawrence MacAulay, P.C., MP
Minister of Agriculture and Agri-food
Government of Canada
minister_ministre@agr.gc.ca

Dear Minister MacAulay;

The Canadian Quarter Horse Association (CQHA) understands there is a movement being brought forward by Alistair MacGregor, M.P. to reintroduce legislation similar to Bill C-322, "An Act to amend the Health of Animals Act and the Meat Inspection Act (slaughter of horses for human consumption)", presented in 2014 by Mr. Alex Atamanenko, M.P. The sole propose of this bill was to prohibit the processing of any horse meat products for human consumption in Canada. There were several issues brought up but the underlying motivation for the bill was the esthetics of human consumption of horse meat.

As President, I am writing on behalf of the CQHA to register our strong objection to any thought of the current Liberal government introducing or supporting this type of legislation. We object to any bill that would ban processing of horses both on a horse welfare basis and agricultural economics basis. Our position is taken largely because we have seen the results of a total ban on processing horses for human consumption in the USA. It has had a devastating effect on both horse welfare and the economics of the horse industry. We would like you and the entire Liberal Party to strongly oppose any bill of this nature on behalf of the entire Canadian horse industry.

The CQHA is the official Canadian affiliate of the American Quarter Horse Association (AQHA). There are close to 17,000 AQHA members in Canada with over 246,000 registered Quarter Horses. Quarter Horses make up approximately 25% of the Canadian horse population. Although obviously not unanimous, I can assure you that the vast majority of Quarter Horse owners agree with the position taken by the CQHA.

To further qualify the position taken here, I am an equine veterinarian, owning and operating a 5 veterinarian practice specializing in performance horses and reproduction for over 40 years. Also, I have been very involved

in the livestock industry, breeding, raising and showing Quarter Horses for over 45 years.

When horse processing was banned in the United States, horse welfare was very seriously compromised and the entire economic base of the horse industry was eroded away. There are literally hundreds of thousands of horses in the USA that are unsuitable for any purpose other than as an agricultural unit, the same relegation as cattle. These horses have been termed the "unwanted horses" because they have no use other than going into the processing industry. A large percentage of these "unwanted horses" present a severe economic burden on their owners for feed and care. Without the processing industry this burden will be carried for the rest of the horses' "natural lives" because there is no market for them in the US and often no other suitable alternative for humanely ending their life. With the banning of processing horse meat products for human consumption in the US, suddenly there was no place for the "unwanted horse" to go. This has led to a huge number of them enduring neglect, abandonment, prolonged suffering, and even death from starvation. The many "horse rescue/adoption" places that have sprung up have not been able to make a significant impact on this situation because of their limited resources. In fact, in many cases because of limited resources, these rescue places get into the same situation they are trying to prevent. Thus, instead of reducing inhumane treatment of horses, as animal activists claim, banning horse processing in many ways caused exactly the opposite. The attached article by Andie Guess sums up the situation in the USA very well and gives a list of references to support her statements. The kind of legislation that was proposed in Bill C-322 will lead to the same situation in Canada with a huge increase in unacceptable horse welfare cases.

Besides the welfare issues, the other equally large and negative issue created by the banning of horse processing is the economic impact on the agricultural industry. We would like to remind everyone that horses are an agriculture entity and are a significant part of the entire agricultural industry, even though they also serve as a companion animal and pet to many people. I have been told that the economic impact of the horse industry in Alberta is larger than the dairy industry. We respect the right of everyone to have their own opinion but we must not let the esthetic values and emotional outcry of a vocal small minority over-ride the rights of owners to choose a humane end-of-life for their livestock.

As stated above, without horse processing there is no economic value for these unwanted horses because there is no satisfactory method of taking care of them either in life or in death by humane euthanasia. These horses have historically served to set a base price for the horse industry and now in the USA this base price is often effectively negative. A negative base price reverberates up through the entire horse industry, severely depressing the prices at all levels, thus severely depressing the economics of the entire industry.

Another part of the basis of Bill C-322 was that horses are not raised for the purpose of food production and they are often administered drugs not approved for use in humans. The drug most commonly talked about is phenylbutazone, a non-steroidal anti-inflammatory often called horse aspirin

or Bute. We would like to counter both of these assertions. In addition to the "unwanted horses" going to a humane end-of-life, there are thousands of horses raised specifically for the processing industry, the same as cattle, hogs, poultry and fish, and the meat serves as an important source of food for cultures that have no esthetic concerns about consuming horse meat. As far as Bute is concerned, the law says no horses go to processing for at least six months if Bute has been administered and tests of the meat by CFIA show that there is no residue in the meat with that length of withdrawal time. Also, the use of Bute is being greatly reduced with the advent of new and very safe nonsteroidal anti-inflammatories that can be used if required to relieve pain and inflammation. Although some science has shown there is a remote chance of Bute causing cancer if consumed in significant quantities, in reality, with the current controls in place, causing cancer is not a concern.

We would also like to refute the animal activists' claims of rampant abuse of horses in the federally regulated processing industry and inhumane end-of-life practices. Being a life-time animal health and welfare proponent and having personal exposure to the processing industry, I can assure you that every effort is made to handle the horses in a humane manner according to the Canadian equine code of practice. The handling and transporting of horses going into the processing industry is done according to the National Farm Animal Care Council's "Code of Practice for the Care and Handling of Equines". The Horse Welfare Alliance of Canada is currently conducting a national survey on the compliance to this Code of Practice, the results of which should be available next year. In addition, recent research conducted in the processing industry in Alberta has shown there is limited stress on the horses at the processing plant and the end-of-life captive bolt is virtually instantaneous. This means the horses are very humanely euthanized.

Besides our association, there is very widespread objection to Bill C-322 type of legislation from other leading equine associations including the American Association of Equine Practitioners, of which most Canadian equine veterinary practitioners are members; our parent association, the American Quarter Horse Association, the largest horse registry in the world; and Equestrian Canada, our Canadian umbrella equine organization and voice of the industry to the federal government.

If you have any questions, please do not hesitate to contact me. For your edification, a list of our objections is attached. I would be more than happy to discuss this entire issue in more detail plus supply documents and scientific references to support our claims.

Sincerely,



Wayne Burwash, DVM
President CQHA

CC: Andrea Lyon, Deputy Minister (andrea.lyon@agr.gc.ca)

Reasons Why the CQHA would object to a ban on processing horse meat products for human consumption in Canada

Horse Welfare:

1. The experience in the USA where literally hundreds of thousands of horses became unwanted because they were unsuitable for any purpose other than as an agricultural unit, the same as cattle.
2. Also, as was the experience in the US, a total ban on processing horses for human consumption led to tremendous horse welfare issues with an increase in abuse, prolonged suffering, abandonment and neglect even to the point death due to starvation. (See the attached article by Andie Guess for details)
3. Often there is no other readily available alternative for humanely ending their life
4. "Horse rescue" and "adoption" places will not be able to make a significant impact on this situation of unwanted horses because of their limited space and resources. In fact, in many cases because of limited resources, these rescue places will get into the same situation they are trying to prevent.

Economic Impact:

1. Horses are an agriculture entity and are a significant part of the entire agricultural industry.
2. There are thousands of horses raised specifically for the processing industry, the same as cattle, hogs, poultry and fish.
3. Banning processing would result in thousands of horses having no use and thus would become "unwanted horses" resulting in severe economic burdens on the owners and society for their food and care. Without the processing industry, this burden will be carried for the rest of the horses' "natural lives".
4. The entire economic base of the horse industry would be eroded away because like other livestock commodities, the processing industry provides a base price.
5. Negative base price reverberates up through the entire horse industry, severely depressing the prices at all levels of the industry, thus severely depressing the economics of the entire industry.

Animal Rights Counter Points

1. Claims of rampant abuse of horses in the federally regulated processing industry are not true. The handling and transporting of horses going into the processing industry is done according to the National Farm Animal Care Council's "Code of Practice for the Care and Handling of Equines".
2. Claims of inhumane end-of-life practices are not true. Recent research has shown that the end-of-life captive-bolt is virtually instantaneous.

Tainted Meat

1. Claims of the meat being of questionable quality are not true. Routine inspection performed by the CFIA assures meat quality, the same as the cattle industry.
2. Claims of meat being tainted with drugs not approved for humans, specifically Bute, are not true. No horses go to processing for at least six months if Bute has been administered and tests of the meat by CFIA show that there is no residue in the meat with that length of withdrawal time.
3. The use of Bute is being greatly reduced with the advent of new and very safe nonsteroidal anti-inflammatories.
4. Although some science has shown there is a remote chance of Bute causing cancer if consumed in significant quantities, in reality, with the current controls that are in place, causing cancer is not a concern.

Human Rights

1. We respect the right of everyone to have their own opinion but we must not let the esthetic values of a vocal small minority over-ride the rights of owners to choose a humane end-of-life for their livestock.
2. Horse meat serves as an important source of food for cultures that have no esthetic concerns about consuming horse meat.
3. The underlying motivation for legislation like Bill C-322 is not animal rights, animal abuse or concern for consumer's health; it is the esthetics of human consumption of horse meat.

2014, The Year of the Horse by Andie Guess 07 Feb. 2014

As we enter 2014, the Chinese zodiac tells us that it is the year of the horse...which began at the legislative level (in the USA) with the passing of the agriculture appropriations bill, the repercussions of which are felt through ranches, farms, national parks, and tribal lands, where the oft ignored rest of the story plays out for unwanted horses and the horse industry as a whole.

It is necessary to recount a brief history before we examine the issue before us. For hundreds of thousands of years (6), man has processed horses into cheval to meet human and animal consumption demands. The business model of processing unwanted horses into an in-demand product sets a base price for the horse industry, similar to other livestock industries. According to the Food and Agriculture Organization of the United Nations (FAO) horses slaughtered for human consumption in the 20 year period from 1981 - 2001 reported a dramatic increase of 76.25%. A slight decrease was reported by FAO for the 10 year period 2001-2011. In 2011, 4,504,308 horses were processed for human consumption down from the preceding 10 year period by 10%.(5)

Despite a growing world population's ever-increasing demand for cheval, special interest-driven U.S. legislative actions have curtailed, and are seeking to completely ban, the US horse industry's access to the thriving global market. In 2005, an appropriation bill was signed into law, prohibiting funds provided under the Federal Meat Inspection Act, and under the guidelines issued under the Federal Agriculture Improvement and Reform Act of 1996, to pay for the inspection of horses for meat.

Thus, in 2007, the last domestic horse processing facility closed its doors. Reports of horse abandonment, neglect and increased export of slaughter horses began to pour in from across the U.S. So, Congress commissioned a study to examine the impact of the ending of domestic horse processing on overall horse welfare. The report, aptly named "Horse Welfare: Action Needed to Address Unintended Consequences from Cessation of Domestic Slaughter" resulted in the following conclusions pertinent to this article:

- a) Exports of US horses to Canada and Mexico increased substantially.
- b) U.S. horses are now being transported further and are not protected by U.S. laws and regulations.
- c) Horse sales and prices, along with the number of shippers so employed have declined, largely in the low to medium end of the horse market.
- d) Horses in the low to medium range were most impacted due to the closure of slaughter domestically, ranging from 8-21 percent. The resulting dip in prices of all horses, also due in part to the economic recession was 4-5 percent.
- e) Horse welfare also declined as state and local governments and animal welfare organizations reported a rise in investigations for horse neglect. Also reported were increased numbers of horses abandoned on private or state parks.
- f) The report found that horse abandonment and neglect cases are up and appear to be straining state, local, tribal. And animal rescue resources.(2)

Due to the results of the GAO report, in 2011, Congress passed an appropriations bill that did not contain the prohibition on the use of funds to inspect horses slaughter, opening the door for five domestically owned processing facilities to apply for USDA inspections. Upon the

application approvals made by the USDA for some of these facilities to begin operations, lawsuits ensued. HSUS and Front Range Equine Rescue et al tied the establishments, who sought to begin operations of slaughtering equines, up in court until 2014. Congress then passed a new 2014 federal budget that once again prohibited the use of appropriated funds to pay for domestic slaughter inspections of horses.(3)

What now are the answers to the U.S. horse industry that address the unwanted horse and animal welfare concerns facing equines, their owners, concerned parties and the U.S. government? According to The Unwanted Horse Coalition (UHC) a study found that horse owners and other equine industry stakeholders are proponents of reopening U.S. horse processing plants, while rescue /adoption/retraining facilities and non-horse owners are not (1). The UHC study found that 81% of horses that became unwanted was due to owners who could no longer afford them (1). The UHC study also indicated the top four most appealing solutions of all respondents were:

- (1) Educate owners to purchase and own responsibly.
- (2) Increase ability of private rescue/retirement facilities to care for unwanted horses.
- (3) Reopen U.S. processing plants
- (4) Increase options and resources to euthanize unwanted horses (1)

A disturbing observation of all respondents in the UHC study found that abuse and neglect of horses has increased. The UHC study found that among those surveyed, 85% of rescue/adoption facilities agreed that abuse and neglect of horses have increased. Comments from across the nation supported this response:

- "Left to starve, abandoned or shot by owners."
- "Turned out in the wild or other properties, even the freeways."
- "Tied to a stranger's trailer."
- "Let loose to die in the woods."
- "Left to run wild or to die on the roadside."
- "Just turned loose to fend for themselves."
- "Starved to death."
- "Abandoned."
- "Just left to die without food or water."(1)

The UHC study also found that 56 % of stakeholders and 72 % of horse breeders cited the closure of domestic processing facilities as the primary contribution to the problem (1). So our question remains to be answered, "what now?"

Solution No.1 suggested by respondents to the UHC survey: educating owners to purchase and own responsibly. (1) The companion animal industry (pet industry) exists as a "comparable" industry for us to determine if solution No. 1 will be a workable solution for unwanted horses of the horse industry. Companion animals see the greatest numbers of abuse, abandonment and neglect across the nation (7). In the companion animal industry there have been years of research and media coverage attempting to do exactly what is proposed by Solution No.1, yet Statistic Brain reports the average annual number of companion animals that are euthanized at shelters at 3,500,000, of which 60% are dogs and 70% are cats. (7) Although the numbers are down from forty years ago, which shows some success, it is not a sufficient solution to end the need to euthanize shelter animals, which cost taxpayers 2 billion dollars annually. (7)

Solution No.2 follows closely on the heels of Solution No.1 which states: Increase the ability of private rescue/retirement facilities to care for unwanted horses. (1) This could be a viable solution; yet, Statistic Brain reports the total number of public funded nationwide pet shelters in 2012 at 5000 and the number of pets that enter into animal shelters nationwide annually at 5,000,000. The cost of these shelters comes at a significant cost to taxpayers of 2 billion dollars. (7) On 02/08/2014 via Guidestar, a search result by this researcher for horse rescues operating as non-profits returned a result of 600 rescue facilities across the nation. April 18, 2009 the same site was accessed by a study aptly named "Unwanted horses: The role of nonprofit equine rescue and sanctuary organizations" with a return result of 408 horse rescue facilities, (1) (16) showing a 47 % growth from 2009 to 2014 of horse rescue facilities in the U.S.

Even with the increase in horse rescue facilities, there has been no decrease in reports of horses being abused, neglected or abandoned. In fact, increases in abuse, neglect and abandonment have been reported across the country by the media and rescue organizations themselves! (8, 9, 10, 11, &12) It appears the same factors that caused the rescued horses to need saving are the same factors affecting those who attempt to save them, so that the saviors need saving. (8, 9, 10, 11, &12)

According to a study in the Journal of Animal Science titled "Unwanted horses: The role of nonprofit equine rescue and sanctuary organizations," in 2010 the potential maximum capacity of those organizations was approximately 13,700 horses nationwide. Based on those numbers given, 326 rescues with a total carrying capacity of 13,700 head would result in a 42 head per facility average. If we calculate this using the rescues currently available (600), we find that the current potential maximum capacity of all United States rescue organizations to 25,200 head of horses.

These estimates bring to light multiple issues in the status quo of the horse rescue industry and its abilities to meet the needs of the US unwanted horse population. Generally, horse rescues do not euthanize or send horses to slaughter. Therefore, horse rescues reported a retention rate of 68.8% of horses relinquished, and of these, 42% were permanent residents of the nonprofit facility. (13)

The evidence demonstrates that instead of serving 25,200 different horses yearly, which still would not come close to the widely accepted estimate of 140,000 horses shipped to be processed annually(14), rescues become bogged down taking care of horses previously relinquished to their care, who become life-long residents of the rescue. (13) Thus, rescues across the nation turn down 39% of the horses offered for relinquishment. (13) Should the SAFE Act, a bill currently before congress that would ban the sale and transport of US equines to foreign processing facilities become law, the number of horses needing rescue services would increase exponentially.

Solution No.3 addresses the actual issues at hand, and supplies a humane, effective, efficient, and environmentally sound solution to the issue of unwanted horses in the US, while also providing an economic benefit to horse owners, the U.S. GDP and stimulating the economy via domestic production. From 2000 through 2013, a period less than ½ the average lifetime of an equine, 1,647,647 horses were either exported for slaughter or domestically slaughtered in the U.S. (14) It is obvious from the numbers represented here that rescue organizations could not begin to accommodate the unwanted horses as presented in Solution No.2. If it were remotely useful to ponder the magnitude of the costs, just in the first year alone, figures presented in the Unwanted Horses Study for the cost of care in 2010 provided in rescues at \$3,648 per year - per horse, (1) the yearly cost arrives at an astronomical amount of \$6,010,616,256! But wait,

there's more! According to USDA ERS the price of hay for 2009/2010 season came in at an average of \$113.00/ton, which is a factor used in the price quoted above for the purposes of the study. Yet, that same hay, reported by USDA ERS, for 2012/2013 fetches \$187/ton for a dramatic 65.48% increase! (19)

Looking at Solution No.4, which is to "increase options and resources to euthanize unwanted horses", the costs of euthanasia solutions averaged \$87.50 per horse. (1) With just the number of horses sent to slaughter from 2010-2013, which totaled 558,911 head, (14) the cost to euthanize those horses come in at \$48,904,712.50! We have yet to address the environmental concerns posed by 140,000+ horses being euthanized yearly. Carcass disposal regulations and requirements vary substantially among cities, counties, and states, as do the agencies that administer and enforce them. (17) Agricultural regulators include the (federal) U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), and your state Department of Agriculture. Environmental regulators whose entire or partial focus is solid waste handling and disposal include the (federal) Environmental Protection Agency (EPA), and state and local Departments of Ecology. (17) The opinion of these agencies considers the carcass of a chemically euthanized animal a bio hazardous waste. Virtually any activity whereby chemicals or wastes may be released to the environment, either intentionally or accidentally, has the potential to pollute ground water. (18) 140,000 horses would amount to 126,000,000 pounds of bio hazardous waste on the low end, and 168,000,000 pounds of bio hazardous waste on the high end. Scientists have proven that barbiturates have a chemical trait that makes compounds resistant to bio-degradation. That the investigated barbiturates, once released into the aquatic environment, show high stability over a long periods of time. Anyone concerned about our environment and drinking water should question the environmental concerns posed by Solution No.4. (20)

Conclusion: The environmental, economical, ethical and humane solutions for U.S. unwanted horses cannot be wholly served by educating owners to purchase and own responsibly as that has not been a sufficient solution in other comparable industries; Increasing the ability of private rescue/retirement facilities to care for unwanted horses is cost prohibitive and the funds do not exist for this endeavor; Increasing options and resources to euthanize unwanted horses begs environmental, ethical and economical concerns for the United States population's safety; Reopening U.S. processing plants, funding inspections for horse processing plants and regulating this industry is the ethical, environmentally friendly, economical and humane solution for U.S unwanted horses and other equines.

A horse-or any food animal-- is a terrible thing to waste, especially when doing so results in not only immense suffering, unnecessary economic hardship, but also environmental damage. With a world market hungry for cheval, it would seem that these horses are not unwanted at all.

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