

**Black Beauty Betrayed:**  
The Slaughter of US and Canadian Horses

**A Report by the  
Canadian Horse Defense  
Coalition  
on Equine Slaughter  
at  
Natural Valley Farms  
Horse Slaughterhouse  
Neudorf, Saskatchewan**

**April 27 - May 1, 2008**

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**CONTENTS**

Executive Summary	4
History of Animal Welfare Violations at Natural Valley Farms	6
Investigation Findings	8
Slaughter Footage Documentation	13
Case Studies	16
Area of Concern: Transportation	21
Area of Concern: Slaughter Process and Slaughterhouse Conditions	23
Canadian Food Inspection Agency (CFIA) Deficiencies	25
Violations of U.S., Canadian and Saskatchewan Laws	27
Conclusions	30
Appendix A: Kill Schedule	33
Appendix B: Livestock Manifest	25



Cover Image: Horse in Kill Waiting Pen at Natural Valley Farms Neudorf, Saskatchewan

## EXECUTIVE SUMMARY

*This report exposes numerous concerns regarding the slaughter of horses at Natural Valley Farms in Neudorf, Saskatchewan. Evidence provided to the Canadian Horse Defense Coalition shows that horses are subject to systemic neglect, cruel handling and poor slaughter practices, resulting in immense suffering for these animals. Further, it is clear that transportation laws are broken and that the Canadian Food Inspection Agency (CFIA) does not enforce the rules mandated by federal regulations.*

*The Canadian Horse Defense Coalition is a coalition of individuals and groups working to protect horses in Canada from slaughter for human consumption, by raising public consciousness through education and achieving the enactment of legislation that will ban these practices in this country.*

*The horse slaughter industry in Canada has been growing rapidly since 2006. Statistics provided by Agriculture and Agri-Food Canada reveal that 50,242 horses were slaughtered in 2006. That number increased to 79,415 in 2007 – a 160% increase. From January to April 2008, over the same period in 2007, the average monthly percentages have increased by an additional 74%. Based on these early numbers, it is estimated that Canada will slaughter 102,570 horses in 2008, another 129% increase over 2007.*

*In September 2007, the last remaining American horse slaughter plant closed its doors, due primarily to public pressure demanding an end to the horse slaughter industry in that country. However, a current lack of U.S. federal legislation banning the transport of horses for slaughter has resulted in a significant increase in horses being slaughtered in Canada and Mexico. The vast majority of horse meat from Canadian slaughter houses is destined for human consumption in Europe and Asia.*

*In Canada, an Ipsos-Reid poll taken in 2004 revealed that nearly 2/3 of Canadians (64%) do not believe in the slaughter of Canadian horses for human consumption.*

*Natural Valley Farms began slaughtering horses in 2007, and slaughters approximately 225 horses per 8 hour working day, 5 days a week, or about 1,125 horses per week. Natural Valley Farms is one of seven federally licensed horse slaughter plants in Canada. It is the only one in Saskatchewan. There are two in Alberta, one in BC, one in Ontario and two in Quebec, bringing the total to seven nationally.*

*In early May 2008, the Canadian Horse Defense Coalition was provided with video footage and photographs taken by an anonymous source, at Natural Valley Farms between April 27 and May 1, 2008.*

*This report provides conclusive evidence of animal cruelty and profound suffering endured by horses slaughtered at Natural Valley Farms. This report will prove that horse slaughter is an industry that must be abolished based on humane grounds, and that horses cannot be humanely slaughtered on a large scale as is carried out daily at Natural Valley Farms.*

*Included in the report is the opinion of Dr. Nicholas Dodman, Section Head and Program Director of the Animal Behavior Department of Clinical Sciences at Tufts University's Cummings' School of Veterinary Medicine. Dr. Dodman concludes that many horses were not rendered unconscious before butchering, as required by the Meat Inspection Act – Part III.*

*Dr. Dodman also notes that horses are intelligent, quick-moving animals, with strong survival instincts that cause them to be challenging to restrain. Horses are very difficult to render unconscious with a single captive bolt shot.*

*During every phase, starting from when horses are transported across Canada and from the United States, to Natural Valley Farms in Saskatchewan, violations of the following occur every step of the way:*

- US Commercial Transportation of Equines to Slaughter Letter of Intent with Canada
- Federal Health of Animals Act (Sick, Pregnant and Unfit Animals; Prohibition of Overcrowding; Segregation; and Protection of Animals from Injury or Sickness)
- Meat Inspection Act
- Livestock Inspection and Transportation Regulations, Province of Saskatchewan
- Recommended Code of Practice for Care and Handling of Farm Animals: Transportation of Horses

*With the exception of the Recommended Code of Practice for the Care and Handling of Farm Animals, the above regulations reflect either U.S. or Canadian law or provincial statutes. Violations of such legislation can result in charges. It is clear that laws, let alone recommended guidelines, are not followed while horses are transported, or during the assembly line slaughter process.*

*For these reasons, the Canadian Horse Defense Coalition believes Natural Valley Farms, and the horse slaughter industry as a whole in Canada must be shut down on humane grounds, as this report clearly shows that horses cannot be slaughtered on this massive scale in a manner which is humane.*



**HISTORY OF ANIMAL WELFARE  
VIOLATIONS AT  
NATURAL VALLEY FARMS  
HORSE SLAUGHTERHOUSE**

Natural Valley Farms  
NE SEC 04 TWP 19A RGE 08 W2 EXTENSIONS ORM OF MCLOAD  
No. 185  
Neudorf, Saskatchewan  
Ph: (306) 748-2477  
Fax: (306) 748-2286  
www.naturalvalley.ca (website has been removed)

Natural Valley Farms is Canada's newest large-scale horse slaughter plant, however its origins were very different. After it received a \$3.9 million multi-year award under the Ruminant Slaughter Equity Assistance Program (RSEA), it quickly shifted its focus to slaughtering horses. It should be noted that the RSEA program is for funding to support producers' investments in building, expanding or converting eligible ruminant slaughter facilities to meet federal standards. According to sources, Natural Valley Farms had a new co-op structure - a co-op with US based Cavel International and its international parent, Velda. Cavel International owned the last US horse slaughter plant to close in September 2007, in DeKalb, Illinois. Every indication is that the Canadian government and cattle producers helped to pay for the construction of a plant to help the beef producers, when it is now proven that the business of Natural Valley Farms in Neudorf, Saskatchewan, is solely for the purpose of horse slaughter.

On a visit to the facility on 26/09/07 investigators from Animals' Angels Canada discovered a large pit where rendering remains of horses and cattle were being dumped. Upon closer inspection it was noticed that captive bolt pistol holes were missing in the heads of many of the horses, yet they appeared to have been butchered for their meat. When management was asked about the method of killing they stated that all horses are killed with a captive bolt pistol, yet the remains of these horses show differently.

Animal's Angels Canada investigators' returned to the rendering pit again on 02/10/07 and were able to inspect new horse heads. Again, many were missing captive bolt pistol holes.

The Head of Investigation for Animals' Angels Canada placed a call to the Canadian Food Inspection Agency's Humane Slaughter Specialist alerting them to the concerns. The CFIA conducted an announced audit and inspected the brains of two horses whom they had just observed being killed with the captive bolt pistol. Both were found to be in compliance with the Humane Slaughter Act. However, this does not explain why the heads in the rendering pit lacked captive bolt pistol holes. The Humane Slaughter Specialist stated that an on-going investigation was being conducted by the CFIA, as the number of losses (horses arriving dead or dying in the rear holding pens) at the plant was unacceptably high.

On 16/11/07 the Head of Investigation for Animals' Angels Canada sent a follow up letter with the concerns, complete with unedited photos taken of the heads in the rendering pit, to management of the plant requesting an explanation for the missing holes. To date, no reply has been received.

On 10/12/07 the concerns regarding the environmental impact of the large rendering pit were shared with the Saskatchewan government. The Department stated that Natural Valley Farms holds a permit for composting, however the carcasses, heads and organs were not in compliance with regulations, as they were not covered with a composting material such as sawdust or straw.

On 26/02/08, the Head of Animals' Angels Canada – now acting as Central Region Director for the Canadian Horse Defense Coalition, made a follow up visit to the facility and rendering pit. At this point the size of the rendering pit had increased enormously. It was now surrounded by a high berm comprised of the bodies of horses. Upon walking through the rendering pit a deceased newborn foal with bruising on his head and neck indicative of being run over with what appeared to be a tractor tire was discovered. His ears had been cut from his head. In the condemned hole, where horses that are dead on arrival are dumped, were four complete horses indicating that the number of horses arriving dead at the plant was increasing, rather than decreasing (one was found on the previous visit). One of these condemned horses still bore a feeder sticker on his back. Was he misleadingly labelled as a feeder horse rather than a slaughter horse to avoid the minimal regulatory checks provided in the US Commercial Transportation of Equines to Slaughter Act? Five horse heads were examined thoroughly. Four of the five were again found to be without captive bolt pistol holes. While leaving the slaughterhouse, two double-decker trailers with Colorado, U.S. plates arrived at the plant and unloaded after plant closure – contrary to the US Commercial Transportation of Equines to Slaughter Act regulations. (There have been accusations of these images being "doctored". The images are available on the SD card used in the camera that took these images – SD card images cannot be altered. They are available for anyone who requests to see them.)



## **INVESTIGATION FINDINGS**

**The Canadian Horse Defense Coalition was provided with footage and photos by an anonymous source taken at Natural Valley Farms slaughterhouse during the period April 27 to May 1, 2008. The source has attested to the veracity of the footage and photos. The raw images and footage are available for review. The following section documents the findings during this time.**

**27/04/08**

The rendering pit was visited on this day, almost exactly two months after the visit by investigators from the Canadian Horse Defense Coalition. The pit had grown enormously and now consisted entirely of horse remains. The only cattle remains in the pit were aged, sun-bleached and only exposed because the ground had been disturbed to bury further horse remains.



A large grinder was in the pit at the end of the row comprised of horse limbs, ribcages and pelvises.





Footage was taken of the horses left in the kill pens overnight. The condition of many of these horses was shocking. One had what looked like Ocular Squamous Cell Carcinoma (“Cancer Eye”) in such an advanced state (Stage 3) that the lesion and necrotic tissue had completely obliterated the horse’s eye and extended at least an inch from her face. Other horses incessantly tried to bite the protruding, weeping injury. In her health-compromised state, according to CFIA’s *Compromised Animals Policy* this horse should have been immediately euthanized and not transported. At a minimum, the slaughterplant should have penned her separately for her own protection. Many other horses had both old and new laceration wounds. A number of them were shockingly gaunt. One horse had such large facial tumours that breathing was affected. Another horse was missing an eye.



Horse missing its right eye



Horse with facial tumour affecting breathing



Horse with Stage 3 Cancer Eye

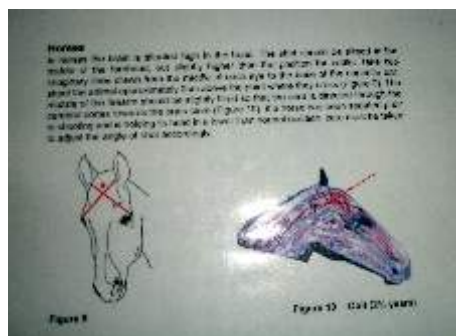
These horses – many of whom should never have been brought to auction in their condition and should certainly not have been transported in such a state – were left without food, water or straw to lie on. This meant that some of these horses could’ve gone without water for days, as many auctions do not provide water pre- or post-sale and transport trailers are not equipped with onboard water systems. According to our prior observations and evidence provided to us, many of these horses originated in the United States meaning a 20 hour journey for them – without water. **Not providing water at a slaughterhouse is contrary to the Meat Inspection Act.**

The horses were so densely packed into the waiting pens, that lying down was not possible. Yet if a compromised horse would go down, it would be life threatening, as it would be trampled, possibly to death.



A diagram indicating how to use a captive bolt pistol was posted on the wall. As we would witness in the footage provided of the actual killing process, this did not necessarily ensure accurate hitting of the horses with the captive bolt pistol.

Disturbingly, the hock cutter is the first stop for the horses that have just been stabbed in the jugular and suspended. In the photo below, the kill pen can be seen in the background to the left of the hock cutter. After viewing the slaughter footage we question whether the close proximity of the cutter allows for a long enough bleed out time to ensure unconsciousness.



Hock cutter – 1<sup>st</sup> stop post stabbing and suspension. Kill pen can be seen in the background on the left.

In the footage provided we saw that in the basement raw horse skins were being salted. A heap of horse manes and tails was left beside a pile of salt.



Horse skins being salted



Cut-off horse manes and tails



Also located in the basement was a freezer room containing nearly 100 horse carcasses. Two of these were marked as "Held".



### **28/04/08**

On this night two double decker trailers were observed unloading horses at 10:50 pm – clearly after operating hours and unobserved by CFIA inspectors as required by the US Commercial Transportation of Equines to Slaughter Act. The Act states that a fine of \$5,000 is to be levied per horse unloaded without the supervision of a CFIA inspector to ensure a humane unloading and record the date and time of arrival. A third double-decker arrived at 2:10 am but did not unload as there was no room to do so – both the inside and outside holding pens were overloaded with horses again unable to lie down.

### **29/04/08**

The illegal unloading of horses after hours was again observed and recorded at the slaughterhouse on this night at 11:25 pm. The trailer left at 12:00 am. A second trailer, again a double-decker, arrived at 1:05 am. Unloading took a long time. The trailer left at 2:40 am. By then, both the outside and inside pens were completely full of horses.



## **SLAUGHTER FOOTAGE DOCUMENTATION**

**Footage of the actual slaughter of the horses was recorded on this day. This footage clearly shows numerous violations of the *Meat Inspection Act* – the Act responsible for ensuring adequate slaughter practices.**

According to documents recorded in the plant (Appendix A), the kill quota at the plant has increased from 200 horses per day to 225 horses per day. As we would see in the footage provided, a great deal of pressure is put on workers to meet this quota. Unfathomably, the Head CFIA veterinarian seems to be part of this pressure. The following are comments yelled to workers by the Head CFIA veterinarian at the plant, including the timestamp of each statement:

- “Hey – speed it up, you guys!” (Video 0002/2:23:00)
- “What’s the hold-up?!” (Video 0003/2:21:54)
- “Hurry up!” (Video 0004/2:20)
- “Hurry up – let’s get to the break!” (Video 0004/39:00)
- “One more!” (Video 0004/39:30)
- “134! Woo hoo!” (Video 0004/42:00)

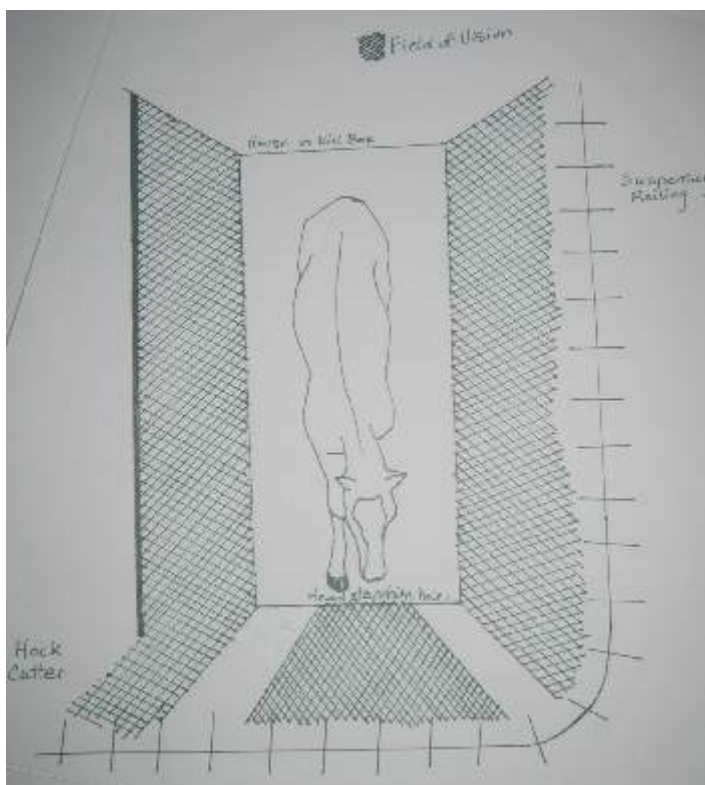
These orders to continually speed up the kill line were almost always followed with an error being made by the captive bolt pistol operator. For example, immediately after he was told “Hey – speed it up you guys!” a horse who had her head in the head stanchion was hit with the captive bolt pistol resulting in the horse’s head becoming lodged. In an attempt to prevent slowing down the kill line, the captive bolt pistol operator repeatedly kicked the horse (who appeared to be regaining consciousness) in the face.

Workers are expected to kill 30 horses every hour meaning one horse every two minutes. The kill day begins at approximately 7:00 am and ends at 3:30 pm. Processing of the horses begins immediately after the first kill and continues past kill end time. Processing makes the facility, including the kill line and kill pen, extremely noisy. Saws, compressors and clanging metal contribute to an extremely frightening environment for the horses. The constant cursing and yelling of obscenities also creates a hostile and intimidating environment for the horses.

Unnecessarily adding to the horses’ fear is the poor design of the kill pen, which allows for a wide field of vision for the horses standing in it. The diagram below shows the range of sight open to horses in the kill pen. When a horse is pushed into the kill pen, he immediately sees the horse that had been ahead of him suspended to his left, stabbed in the jugular and exsanguinating. The handler who suspends the horses with a chain on the suspensory railing must swing the suspended horse repeatedly, getting up enough speed for the horse to be pushed around the bend of the railing. This means blood is sprayed everywhere and the suspended horse, who is likely shod (the vast majority of the horses were) often slams against or kicks the kill pen (or once even the horse within it), further terrorizing the horse.

Because the kill pen was not designed for horses, but rather for cattle, an open head stanchion is at the front of the pen. Suspended horses are often left hanging and bleeding out in front of the horse standing in the kill pen. Many horses (mares in particular – as we were able to deduce from seeing their bodies suspended being pushed past the camera) reach their heads through the open stanch as far as possible to try to touch the suspended horse.

As the suspended horse is pushed along the railing, the eyes of the horse in the kill pen often follow it. The wall alongside the kill pen is not long enough to prevent the horse in the kill pen from viewing the butchering area. As mentioned earlier, the hock cutter is the first saw encountered post suspension. Once the suspended horse is out of the way, the suspender often uses a mop to pool the blood and push it out of the way. The horse in the kill pen views all of this through the open head stanchion.



The placement of the captive bolt pistol operator is also concerning as he stands alongside the horse, rather than in front of it, which makes an accurate hit more difficult. Two captive bolt pistol operators were seen on this day. One shot the majority of the horses, the second – who was more inexperienced – was called in when difficulties arose with a horse.

As seen at Richelieu, the horse slaughterplant in Masseville, Quebec, horses were again left standing in the bloody kill pen – sometimes for as long as 20-30 minutes. This caused enormous and unnecessary fear in the horses.

**The majority of the horses were so frightened in the kill pen that they trembled to the point of losing their footing and fell. Almost all flinched away from the captive bolt pistol and required a cane be placed under their chins in an attempt to steady their heads. The bloody floor of the kill pen did not provide any traction and the majority of the horses were shod, resulting in a very slippery surface for them to stand on. Many shook and trembled so violently it almost appeared as though the footage was on fast forward. Some of the horses pawed to get out of the kill pen. Many frantically searched for an escape, the terror clear in their eyes and bodies. The fear these horses experience cannot be overstated.**

Confirming what we had privately been told by some CFIA inspectors and veterinarians, no CFIA inspectors or veterinarians were ever present to oversee the actual killing of the horses. The only people present were the two captive bolt pistol operators (the backup operator pushed horses into the kill pen when not shooting them) and two hangers who would suspend the horses by a rear leg.

It appeared as though the CFIA veterinarians and inspectors spent the day in the lab in the basement or pressuring workers to increase line speed in the butchering area.

As we would see later this day, the vast majority of the horses being killed were still shod, meaning they had been transported with their metal shoes on. This is illegal in Canada unless the horses are divided which, according to paperwork recorded, was not done or possible as the horses were transported in double-deck trailers with the second deck used. At one point in the killing, a shoe fell off a horse who came crashing down from the suspensory railing. Numerous shod horses were visible in the slaughter footage as their feet were clearly visible from hanging.

**As a brief summary of the slaughters on this day:**

- 1. One horse was not bled out until over 3 minutes had passed from the time of the captive bolt hit (increasing time means a higher probability of revival);**
- 2. Three horses fell from the suspensory railing in front of live horses left standing in the kill box. One of these horses was left lying on the floor, bleeding out, for over 2 minutes;**
- 3. Two horses were shot with the captive bolt pistol while backwards in the kill pen. All horses standing in the kill line saw the horses being shot this way;**
- 4. Two horses attempted to jump out of the kill pen. One became lodged twisted in the pen;**
- 5. One horse who was shot inaccurately had a second shot delivered but the location of the shot was at the base of the skull. This is the equivalent of puntilla (icepick to the spinal cord), as it does nothing to render the animal insensible. It only immobilizes the animal who is then fully conscious throughout the butchering process;**
- 6. Many horses showed movement of their lips and tongue (a sign of returning sensibility according to Dr. Temple Grandin's *How to Determine Insensibility – August, 2007*). One of these horses had tongue and mouth movements up to 2+ minutes post hit. This horse was kicked in the teeth repeatedly by the captive bolt pistol operator in an attempt to dislodge the horse's head from the head stanchion where it had become trapped. The horse continued to open and close his mouth after each kick as though gasping for air. The CFIA Head veterinarian was aware of the abuse and unbelievably even directing the violent actions from her position in the butchering line (see page 16 for a full description of the incident); and**
- 7. After viewing the footage, Dr. Nicholas Dodman of Tufts' University stated: "The horses experienced sheer terror", "Some horses were not properly stunned...Horse 91 and 174 were clearly not dead before the butchering began".**



## Case Studies

The following section documents the deaths of a few of the horses killed on this day. Many more than these experienced improperly placed captive bolt pistol hits and aggressive handling but these provide an example of the slaughter experience for many of the horses at Natural Valley Farms, which has been described by Dr. Nicholas Dodman as “a horse’s worst nightmare”.

**Horse 67 (Video 0002):**

- 2:21:54 Horse 67 pushed into kill pen
- 2:23:00 "Hey, speed it up you guys!" yelled by female CFIA Head veterinarian [We are certain this was spoken by the CFIA Head veterinarian as we were told the Head vet is a female and she appeared (and spoke) early in the morning to inspect the cleanliness of the kill box, directed activities of the workers and had a clipboard and different coloured hard hat. She did not return to the kill box after this one brief visit. She spent the day either in the basement or in the butchering area.]
- 2:25:34 Horse 67 hit with the captive bolt pistol and goes down but its head becomes stuck in the head stanchion
- 2:26:26 Captive bolt pistol operator kicks face and teeth of horse over and over again in an attempt to kick its head free
- 2:26:30 Horse's mouth clearly opening and closing as though gasping
- 2:27:01 Horse kicked in teeth again
- 2:27:03 Second worker comes with another prod  
Captive bolt pistol operator: "That's not gonna get him out."  
Head CFIA Veterinarian: "Can you get him out?! Use the stick! Poke it through!"
- 2:27:05 Hydraulic chain attached and pulling at leg of horse even while head trapped
- 2:27:33 Horse's tongue and head are increasingly moving – clear signs of returning consciousness  
Worker continually pulls on cable on leg. Horse's face poked with a prod.
- 2:27:40 Horse's body whipped away by cable as head freed
- 2:28:51 Horse suspended and stabbed (3+ minutes post hit)

**Horse 91 (Video 0003):**

- 55:48 Horse 91 enters kill pen
- 56:32 Horse hit with captive bolt pistol inaccurately and goes down
- 56:45 Horse's body convulses severely and the horse begins to tilt his head back
- 57:06 The horse begins to clearly open and close his mouth, he appears to have only been rendered partially insensible and is regaining full consciousness
- 57:19 No corrective shot is provided. The horse is suspended, stabbed in the jugular and pushed into the butchering area.

**Horses 139 and 140 (Video 0003):**

- 2:27:10 Horse 139 pushed into kill pen
- 2:35:22 Horse left waiting in the bloody kill pen for over 8 minutes as a worker uses a mop to push the blood around, then hoses the area down. Workers can be heard yelling back and forth "Ah fuck off!" "Oh Jesus Christ!" etc.
- 2:37:48 Horse finally hit with the captive bolt pistol and goes down (after being left in bloody kill pen for over 10 minutes)
- 2:37:48 Horse suspended and stabbed in the jugular
- 2:38:13 Horse falls from railing and drops to the ground, bleeding
- 2:38:39 Horse 140 is brought in even though Horse 139 is lying on the ground beside him
- 2:38:48 Shoe that was knocked off in the fall removed from the area
- 2:39:14 A great deal of joking around is heard in the butchering area, include the female CFIA Head veterinarian's voice: "Woo hoo!" "Woo hoo – YA!" "OH YA!"
- 2:39:30 Horse 140 continues staring at Horse 139 lying on the ground bleeding out
- 2:40:33 Horse 140 hit with the captive bolt pistol and falls
- 2:40:39 Horse 139 is finally pulled out from beside the kill pen and re-suspended
- 2:41:20 Horse 140 is suspended. Can then hear the female CFIA veterinarian's voice shout: "I'll be downstairs" (where the CFIA lab is located)

**Horse 174 (Video 0004):**

- 1:32:57 Horse 174 runs into the kill pen and immediately puts her head out of the head stanchion trying to reach the suspended horse
- 1:37:24 She is still trying to reach the suspended horse (for nearly 5 minutes now)
- 1:37:55 The water hose is turned on and startles her away from the stanchion
- 1:38:27 The horse is hit with the captive bolt pistol but she is not in the correct position so the hit is inaccurate. The horse's head continues to move while her body remains hung up on the top of the kill pen. She is jabbed by the prod of the captive bolt pistol operator to try to push her off the top of the kill pen. It does not work. The captive bolt pistol operator reloads.
- 1:38:57 The captive bolt pistol operator hits the horse again but AT THE BASE OF THE SKULL into the spinal cord. This shot makes the horse propel forward and causes heavy convulsions. Eventually the horse slides down off the top of the kill pen.  
Captive bolt pistol operator states to the suspender: "I can't hit him right".  
The captive bolt pistol operator calls someone over and we hear a discussion between him and the CFIA head veterinarian. We are unable to make out the conversation as it is spoken in hushed voices but we believe the operator is telling the CFIA head vet about the still-conscious horse.
- 1:40:15 Regardless of this, the horse is suspended and stabbed. Her hooves are visible and we can see that she is shod as she passes by the camera on the suspensory railing being pushed toward the butchering area.



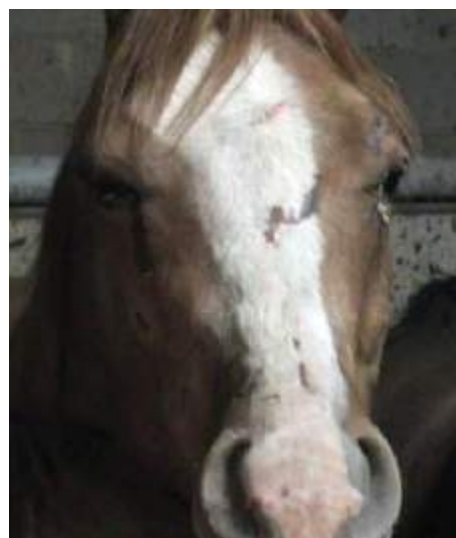


As with all farm animals during slaughter, the more frightened the animal, the more patience required to work with them but with increasing pressure to keep the line speed up, these animals are at a high risk of being tormented and abused with a greater likelihood their captive bolt pistol positioning will not be accurate as well. This was particularly clear with the horses who were more jittery. By later in the kill day the captive bolt pistol operator became angry and started tormenting the frightened horses by beating them with his prod and yelling at them. Sometimes the backup captive bolt pistol operator was called in and would beat the horse with his prod as well. This only increased the horses' fear, causing the animals to fall repeatedly. With all this movement a properly placed shot is all but impossible.

Later this same day, the condition of the horses left in the holding pens overnight was again documented. Again, many were in poor condition. One had large tumours along its neck and another had an infection in both eyes.



Neck tumours



Weepy, infected eyes

Photographic evidence collected on this day showed bins of lower legs of horses, many of which still had metal shoes attached. This is further evidence that horses are being transported to the plant shod. Federal transport regulations dictate that shoes are removed before transport or the horses be separated with metal dividers to prevent kicking of other horses. We have never seen horses segregated during transport in this manner and from the slaughterhouse paperwork provided to us it is clear that horses are being transported in large lots – of generally 37-39 horses per trailer. These horses are therefore being transported shod and unsegregated. This could be contributing to the large numbers of horses who are arriving at the plant dead. The lower limbs and hooves in the rendering pit had had these shoes removed, thus the plant appears to be removing them before the general public is able to see that these horses are being transported illegally with shoes on. Many horses could be dying because of it.



Lower limb remover, 1<sup>st</sup> stop post suspension





Shoes left on horses' hooves while transported



Paperwork observed listed Charles Carter as a major supplier hauling 38 horses per trailer load (APPENDIX B). In order to load 38 horses the second deck must be used, which is also illegal according to the US Transportation of Equines to Slaughter Act and does not comply with CFIA federal Transport regulations which stipulate that all animals must have adequate enough head space to allow for standing in their natural position.

Again a trailer was unloading at 10:50 pm. The trailer left at 11:30 pm. One trailer remained in the unloading area with his lights off, likely forced to wait until morning to unload as the pens were overloaded with horses.

**01/05/08**

The conditions of remains in the rendering pit were documented on this day. The limbs and heads of some of the horses indicated that they had been transported in poor body condition. One lower limb showed a badly cracked hoof.



Skinned horse head and badly cracked hoof



Fresh decapitated horse head



The condemned pit again held numerous complete horses who had arrived at the slaughterhouse dead – at least five were visible and fresh. This again indicates that although the CFIA is conducting an ongoing investigation into why so many horses are arriving dead at the plant, the numbers continue to climb. At the time of the first inspection on September 26 **one** horse was in the pit; on February 26 **four** horses were in the pit and now two months later, **at least five** horses are in the pit.



**AREA OF CONCERN:**

**TRANSPORTATION**

1. The continuing practice of horses arriving and being unloaded after operating hours when no CFIA inspector is available to ensure humane unloading of what are more often than not, health-compromised horses.

This practice is contrary to the *US Commercial Transportation of Equines to Slaughter Act* and punishable by a \$5,000 fine per horse unloaded without CFIA inspector presence. With an average of 38 horses per trailer this should result in a \$190,000 fine per trailer unloaded after business hours.

2. Continued allowance of use of double-decker trailers.

Double-decker trailers clearly violate the federal *Health of Animals Act* governing transport of animals, yet they continue to be allowed in Canada. While the plant denies the use of double-decker trailers, the number of horses transported per trailer-load is simply not possible without using the second deck.

The use of double-decker trailers for slaughter-bound horses is also contrary to the *US Commercial Transportation of Equines to Slaughter Act*.

3. Condition of the horses.

The majority of the horses documented were in very poor condition – including conditions such as emaciation, exhaustion, old and new injuries, tumours, bleeding and weeping eyes and cancer eye. According to the CFIA's *Compromised Animals Policy* of 2004, none of these animals should have been loaded and transported.

4. Horses transported while shod.

Many of the horses had been transported shod – which is specifically prohibited under the *Health of Animals Act*. These horses were not separated for their own and their trailer-mates' protection meaning the horses were at a high risk of being kicked severely – enough to bring about their death. We believe this is likely responsible in some measure for horses arriving at the plant dead. The CFIA has to be aware of this practice, yet has allowed it to continue. It is irresponsible for the CFIA to not insist on being present when horses are unloaded to ensure they are not being transported shod and to ensure those that are injured during transport are being euthanized on the trailer rather than being removed from the trailer in an inhumane manner. This is a legal requirement.



**AREA OF CONCERN:**

**SLAUGHTER PROCESS  
AND  
SLAUGHTERHOUSE CONDITIONS**

1. Setup of the Kill Box and Kill Line. Horses are being suspended, stabbed in the jugular and exsanguinated directly beside the horse in the kill box. The worker must push the suspended horse frequently enough and with enough force to create momentum to push the hanging horse along the suspensory rail. This causes a wide blood spray which the horse about to be hit with the captive bolt pistol is forced to witness.
2. Location of the Captive Bolt Pistol Operator is incorrect. Rather than being directly in front of the horse, he is to the side, greatly increasing the likelihood of an inaccurate hit. Unconsciousness may not be immediately rendered in many cases but the slaughter line proceeds none-the-less.
3. Leaving a horse in the kill box while cleaning the area of excess blood. This drastically increases a horse's time in the kill box, to view the blood and remains of the horse before it while separated from the others. One horse was left in the bloody kill pen alone for over 10 minutes.
4. Horses as a Prey Animal Species. The horses are so frightened they are often trembling to the point of falling while standing in the kill box. All horses put their heads as low as possible. The captive bolt pistol operator must raise the horse's head with a cane, which the horse inevitably becomes startled by and responds to by throwing his head in the opposite direction. The pistol operator must quickly place and aim the gun, often resulting in an inaccurate hit.
5. Inaccurate Hitting & Speed of the Kill Line. Horses are frequently not being stunned properly by the captive bolt pistol operator. Often the hits are too far back on the head and improperly angled. This would not create enough damage to the cerebrum meaning horses are not being rendered instantly unconscious. Many horses showed mouthing behaviours, signs of partial sensibility and/or returning sensibility according to Dr. Temple Grandin and Dr. Nicholas Dodman. The speed of the kill line and the pressure to increasingly kill more horses per day does not allow for a second hit to those animals reviving during the slaughter process and in fact we saw only one horse who was hit a second time (but the hit was extremely inaccurately placed), although many more required it.
6. Lack of food, water and straw to lie on. The lack of basic provisions such as feed and water are illegal according to the *Meat Inspection Act*. Given the especially poor condition of these horses, as well as the long duration of their transport (the majority are coming from the US – Colorado area) the provision of water is a requirement. The lack of it shows a disregard for the welfare of these already-suffering horses.
7. Potential Explanation for Lack of Captive Bolt Pistol Holes in Heads of Horses Seen in Rendering Pit. Considering the captive bolt pistol operator's use of a second shot to the base of the skull on a reviving horse, it has been suggested by Dr. Nicholas Dodman that use of this practice (the equivalent of an ice-pick to the spinal cord as practiced in Mexico which simply immobilizes the animal but does not render it unconscious) may explain the missing captive bolt holes on skulls of horses in the rendering pit.



**AREA OF CONCERN:**

**CANADIAN FOOD INSPECTION AGENCY (CFIA)  
DEFICIENCIES**



The CFIA can no longer claim ignorance of the violations and abuses occurring at Natural Valley Farms.

Given that we are told there are five CFIA inspectors and veterinarians at the facility we have serious concerns with their lack of enforcement of the regulations. While the CFIA claims to be conducting an ongoing investigation into why so many horses are arriving at the plant dead, the answers are clearly in front of them – the horses are being transported shod, on double-decker trailers and unloaded during the night. Is this to avoid the minimal humane transportation checks at the Canada/US border crossings?

The CFIA inspectors at the plant are doing nothing to ensure the horses left in the kill pens overnight are provided with the basic necessities – even those mandated by federal regulations.

The CFIA inspectors and veterinarians are doing nothing to discourage the transport of severely injured or ill horses as we saw in the footage provided many painful, debilitating conditions in which mixing, loading, transport over a long distance and unloading had to have been exacerbated by.

The CFIA are also not ensuring the segregation of severely ill, injured or diseased animals to ensure they will not be tormented by the other stressed horses during the night.

CFIA inspectors, contrary to what they claim, are not overseeing the actual killing of the horses yet they are well aware of problems concerning captive bolt placement on the heads of horses (since at least Animals' Angels Canada's first report in October, 2007). **CFIA also knows that this facility has a history of poor captive bolt pistol accuracy as we were told that the plant had an unacceptably high rate of returning sensibility in cattle when the plant was killing only bovines.**

Yet, CFIA felt it acceptable that the plant be granted certification to begin killing horses, a flight animal that is well-known to be head-shy and difficult to shoot.

Livestock Manifest: "Transfer to Pen D when inspected"  
Evidence that horses were unloaded without CFIA presence

It also appears that the Head CFIA veterinarian is contributing to the level of cruelty and percentage of horses not rendered insensible by continually pressuring for increased line speed. The case of Horses 91 and 174 indicate that the Head CFIA vet was aware of the abuse of the reviving horse (kicking in the teeth) and even directing the abuse by suggesting the workers poke the horse's head through the stanchion with a prod. In the case of the horse that could not be rendered unconscious after 2 captive bolt hits, the captive bolt pistol operator appears to tell the Head CFIA inspector about the problem but regardless the horse is suspended live, stabbed in the jugular and sent down the butchering line. We do not know if the horse had started to be butchered but the suspension of a live, conscious animal is illegal in Canada.



## **VIOLATIONS OF U.S., CANADIAN AND SASKATCHEWAN LAWS**

**1. US Commercial Transportation of Equines to Slaughter  
Letter of Intent with Canada**

“The Canadian Food Inspection Agency (CFIA) at the border must:

- Verify that the accompanying original US health certificate is endorsed by a USDA veterinarian and for each horse identified on the certificate provide all information required by the Canadian Federal Health of Animals Regulations;
- This includes, verifying that a veterinarian inspected the animal within 30 days before it was exported to Canada and was found to be clinically healthy and fit to travel (VS Form 17-140);
- Determine the duration of transport by referring to the accomodating owner/shipper certificate;
- Provide veterinary inspection of the horses to verify that the horses are being transported humanely.”

“At the Destination Slaughter Plant CFIA must:

- Conduct a veterinary ante-mortem inspection on each horse prior to slaughter;
- Identify time and date of arrival of each truckload of US-origin horses.”

Assessment of civil penalties up to \$5,000 per animal violation

**2. Federal Health of Animals Act  
Part XII SICK, PREGNANT, AND UNFIT ANIMALS**

**138.(2)** Subject to subsection (3), no person shall load or cause to be loaded on any railway car, motor vehicle, aircraft or vessel and no one shall transport or cause to be transported an animal (a)that by reason of infirmity, illness, injury, fatigue or any other cause cannot be transported without undue suffering during the expected journey;

**138.(2.1)** For the purpose of paragraph (2)(a), a non-ambulatory animal is an animal that cannot be transported without undue suffering during the expected journey.

**138.(4)** No railway company or motor carrier shall continue to transport an animal that is injured or becomes ill or otherwise unfit for transport during a journey beyond the nearest suitable place at which it can receive proper care and attention.

**Part XII PROHIBITION OF OVERCROWDING**

**140.(1)** No person shall load or cause to be loaded any animal in any railway car, motor vehicle, aircraft, vessel, crate or container if, by so loading, that railway car, motor vehicle, aircraft, vessel, crate or container is crowded to such an extent as to be likely to cause injury or undue suffering to any animal therein.

**140.(2)** No person shall transport or cause to be transported any animal in any railway car, motor vehicle, aircraft, vessel, crate or container that is crowded to such an extent as to be likely to cause injury or undue suffering to any animal therein.

**Part XII SEGREGATION**

**141.(4)** Animals of the same species that are incompatible by nature shall be segregated during transport.

**141.(7)** An equine shall, unless its hind feet are unshod, be segregated from all other equines during transport.

**142.** No person shall transport or cause to be transported animals in a railway car, motor vehicle, aircraft or vessel unless  
(a)each animal is able to stand in its natural position without coming into contact with a deck or roof.  
(b)provision is made for the drainage or absorption of urine from all decks or levels.



## **Part XII PROTECTION OF ANIMALS FROM INJURY OR SICKNESS**

**143.(1)** No person shall transport or cause to be transported any animal in a railway car, motor vehicle, aircraft, vessel, crate or container if injury or undue suffering is likely to be caused to the animal by reason of

(a) inadequate construction of the railway car, motor vehicle, aircraft vessel, container or any part thereof.

(e) inadequate ventilation.

## **Part XII PERMITS AND LICENCES**

### **Form and Conditions**

**160.(3)** The Minister may cancel or suspend a permit or licence issued under these Regulations if he has reason to believe that,

(a) any condition under which the permit or licence was issued or any condition contained in the permit or licence has not been complied with;

(b) any provision of the Act or these Regulations has not been complied with; or

(c) failure to do so could result in the introduction into Canada, or spread within Canada, of a vector, disease or toxic substance.

### **3. Meat Inspection Act – PART III**

#### **Examination, Inspection, Humane Treatment and Slaughter, Packaging and Labelling**

**62.(1)** No food animal shall be handled in a manner that subjects the animal to avoidable distress or avoidable pain.

**65.** Every food animal in a holding pen awaiting slaughter shall be provided with access to potable water and shall, if held for more than 24 hours, be provided with feed.

**78.** No food animal, other than a bird or domesticated rabbit, shall be suspended for the purpose of slaughter unless, immediately before being suspended, it is rendered unconscious or killed by a method set out in section 79.

**79.** Every food animal that is slaughtered shall, before being bled,

(a) be rendered unconscious in a manner that ensures that it does not regain consciousness before death, by one of the following methods:

(i) by delivering a blow to the head by means of a penetrating or non-penetrating mechanical device in a manner that causes immediate loss of consciousness,

(ii) by exposure to a gas or a gas mixture in a manner that causes a rapid loss of consciousness; or

(iii) by the application of an electrical current in a manner that causes immediate loss of consciousness.

**80.** No equipment or instrument for restraining, slaughtering or rendering unconscious any food animal shall be used by any person for those purposes

(a) unless the person is, by reason of the person's competence and physical condition, able to do so without subjecting the animal to avoidable distress or avoidable pain; or



(b) where the condition of the equipment or instrument or the manner in which or the circumstances under which the equipment or instrument is used might subject the animal to avoidable distress or avoidable pain.

#### 4. **Livestock Inspection and Transportation Regulations Province of Saskatchewan Transportation of livestock**

**17(1)** No person shall transport livestock in a vehicle which does not fulfill the requirements of these regulations respecting the transportation of livestock.

**17(2)** Every person transporting livestock shall be responsible for ensuring that all the regulations respecting the transportation of livestock under these regulations are fulfilled.

##### **Criteria for livestock transportation vehicles**

**18(3)** (a) Where an upper deck is used on vehicles transporting livestock, the underside of the said upper deck shall at all times provide clear head room for all livestock standing in a natural position on the floor immediately below the said deck of the vehicle.

##### **Classes of livestock shall be separated during transit**

**21** Where horses, cattle, calves under 200 kg in weight, sheep, goats and swine, or two or more of such kinds of livestock are transported by a vehicle at the same time:

(b) crippled, injured, sick or disabled animals must be separated from other livestock by a partition;

(c) any animal that becomes crippled, injured, sick or disabled during transport, or that dies during transport, must be unloaded at the nearest stockyard for treatment or disposal at the vehicle owner's expense.

**22(1)** Where animals have been on a vehicle for 12 hours or more and the animals are unloaded for feed and water, such animals shall not be reloaded for a minimum of five hours to ensure that the animals have ample opportunity for access to feed, water and a rest period.

#### 5. **Recommended Code of Practice for the Care and Handling of Farm Animals: Transportation Horses**

##### **General Considerations**

8.5.2 Blind horses require special handling. A blind horse should be haltered and transported individually or with familiar pen mates or a compatible horse. They should never be sold through auction markets or other unfamiliar surroundings.

##### **Headroom**

8.5.3 Each animal must be able to assume a natural stance, standing with four feet on the floor and have a full range of head and neck movement without touching the ceiling of the container. As a guide the minimum headroom for horses in transit can be approximated by multiplying the withers height by 1.25 (1 inch of headroom, withers to ceiling height for each hand in withers height).

8.5.4 When using possum belly trailers for horse transport, handlers must pay special attention to prevent horses' heads from coming into contact with the deck while moving into or out of the upper or lower decks. The internal angle and positioning of ramps can alter effective headroom when horses pass through doors.

##### **Appendix 4: Guidelines for Humane Killing of Animals by Firearms Horses**

The animal must be adequately restrained to ensure proper placement of the shot.

#### **Part XII PERMITS AND LICENCES**

##### **Form and Conditions**

**160.(3)** The Minister may cancel or suspend a permit or licence issued under these Regulations if he has reason to believe that,

(d) any condition under which the permit or licence was issued or any condition contained in the permit or licence has not been complied with;

(e) any provision of the Act of these Regulations has not been complied with; or failure to do so could result in the introduction into Canada, or spread within Canada, of a vector, disease or toxic substance (FOR EXAMPLE, EQUINE HERPES)



## CONCLUSION

**Given the massive deficiencies in carrying out humane equine transportation to slaughter and slaughter practices for horses, the Canadian Horse Defense Coalition concludes that Natural Valley Farms, as well as the six other federally licensed horse slaughter plants, should be closed permanently to equine slaughter and the horse slaughter industry abolished.**

**This report proves conclusively that horse slaughter, particularly on the scale it is carried out in Canada, cannot be regulated and carried out to a level that is acceptable to Canadians.**

All photos in this report have been unedited (but cropped for space). Original images and footage available upon request.



**APPENDIX A**

**KILL SCHEDULE**



# Kill Schedule

Date **6:52 Time 1st animal knocked**

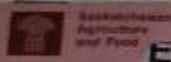
apr8/08	# of horses knocked	Projected # of horses knocked	Actual horses knocked/hr	Projected horses knocked/hr	Positions	
8:00 AM	28	30	28	30	<b>Basement</b>	
9:00 AM	56	60	28	30	lead	<input checked="" type="checkbox"/>
10:00 AM	84	90	28	30	rollers & tubs	<input checked="" type="checkbox"/>
11:30 AM	110	120	26	30	salt & fold hides	<input type="checkbox"/>
12:30 PM	136	150	26	30	salt & fold hides	<input type="checkbox"/>
1:00 PM	150	165	14	15	<b>Semi-clean</b>	<input type="checkbox"/>
2:30 PM	176	195	26	30	Drover/Knocker	<input checked="" type="checkbox"/>
3:30 PM	207	225	31	30	Drover/Knocker	<input checked="" type="checkbox"/>
Overtime					Shackler	<input checked="" type="checkbox"/>
4:30 PM					Weights Recorder - Live Scale	<input checked="" type="checkbox"/>
5:30 PM					Sticker	<input checked="" type="checkbox"/>
Total # horses knocked					First Ledger	<input checked="" type="checkbox"/>
# of horses condemned					floating legger	<input checked="" type="checkbox"/>
Average horses killed/hr					Second Ledger	<input checked="" type="checkbox"/>
# of man hrs used/day					Fronter	<input type="checkbox"/>
# of hrs used/horse					Hide Pullers	<input checked="" type="checkbox"/>
					Hide Pullers	<input type="checkbox"/>
					<b>Clean</b>	<input type="checkbox"/>
					Open Brisket	<input type="checkbox"/>
					bunger	<input checked="" type="checkbox"/>
					hang head & remove tongue	<input checked="" type="checkbox"/>
					Table Separator	<input type="checkbox"/>
					Eviserator	<input checked="" type="checkbox"/>
					Eviserator	<input type="checkbox"/>
					Alternate splitter	<input type="checkbox"/>
					Splitter	<input checked="" type="checkbox"/>
					Top Trim	<input checked="" type="checkbox"/>
					Top Trim	<input type="checkbox"/>
					bottom trim & held rail	<input checked="" type="checkbox"/>
					Scale & bottom trim	<input checked="" type="checkbox"/>
					Knife room & killfloor spare	<input checked="" type="checkbox"/>
					Scribe backs	<input checked="" type="checkbox"/>
					Drip	<input checked="" type="checkbox"/>
					<b># of people missing</b>	



## **APPENDIX B**

### **LIVESTOCK MANIFEST**

IBM



E

# Livestock Manifest 10

LOT NO: 30

**SU 488748** PRINT AND PRESS HARD Date 0430 08

Pay to (Owner - Payee) CLB Payer's Phone Number

Address of Owner (Payee) 46 Chamber Postal Code

Or Account of Producer (Contributor) Banker Producer's P.O. Box Number

Producer's (Contributor's) Address Postal Code R.M. Number

Consigned or Transported to WF Address Newspaper

No.	Kind	Colour	Brands	Location of Brand	Market Use Only
38	horse	brn			

Total Animals 38 I certify that the information above is true. Total Horns

Owner's signature (or authorized agent)

Transporter's Name \_\_\_\_\_ Address \_\_\_\_\_

Vehicle License # \_\_\_\_\_ Hauling Charge \_\_\_\_\_ Transport Driver's Signature \_\_\_\_\_

Total Animals Confirmed by: \_\_\_\_\_ Month \_\_\_\_\_ Day \_\_\_\_\_ Year \_\_\_\_\_ Time \_\_\_\_\_

Market Receiver's Signature \_\_\_\_\_

**Inspector's Use Only**

Date \_\_\_\_\_ Month \_\_\_\_\_ Day \_\_\_\_\_ Year \_\_\_\_\_ Inspector's Remarks

Insp. Point Code \_\_\_\_\_ Dealer or Branch Number \_\_\_\_\_ **B** -

Cattle \_\_\_\_\_ Horse \_\_\_\_\_ Statutory Deductions \_\_\_\_\_

Total Inspections T Total Inspections T Check Off C Items H

Special Insp. No. \_\_\_\_\_

Receipt No. \_\_\_\_\_ Amt. Collected by Inspector \_\_\_\_\_

Inspector's Signature \_\_\_\_\_ Inspector's No. \_\_\_\_\_

Copy 1 - Inspector's Copy

SU 488748



