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Brussels, 12 January 2022

**Subject: Horse Welfare in the context of CETA Regulatory Cooperation Forum**

Dear Ms Mary Ng, dear Mr Redonnet,

Eurogroup for Animals and the Canadian Horse Defence Coalition would like to bring your attention to the serious animal welfare concerns raised by the trade in horse meat between Canada and the EU. As the Regulatory Cooperation Forum (RCF) established under CETA has listed among its objectives to foster cooperation on animal welfare between Canada and the EU, we believe horse welfare is a topic that should be discussed in that context. Furthermore, timing has never been better to discuss horse welfare now that it has become a priority of the [Canadian government to ban live horse exports](#), mainly due to poor transport conditions.

The current production processes in Canada are extremely detrimental to the welfare of horses. At the moment, many horses slaughtered in Canada are imported alive from the US – where slaughtering them is prohibited. The preferential rate use of Canadian horse meat under CETA remains low (even if increasing), which suggests that either most horses ending up in the EU as meat are likely not to be born in Canada, but South of the border, or that the origin could not be established<sup>1</sup>. Indeed, in 2020, Canada exported 4,405 metric tonnes of horse meat, which corresponds to roughly 25 000 horses, but only 6,919 horses were exported from the US to Canada for slaughter.

The journeys from the US to Canada take place in horrendous conditions, most often in cattle trailers with no individual pens or access to water. Then, once in Canada, due to the EU “six month-residency” rule,

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<sup>1</sup> According to CETA’s rules of origin, preferences cannot be used for meat derived from animals not born in the partner country’s territory. PUR for Canadian horse meat was 0.9% in 2017, up to 9% in 2020.

most animals are kept on open-air feedlots in horrifying conditions without any protection from the weather or, according to NGO investigations, any veterinary care. As Canada only operates two slaughterhouses for horses, the animals then have to face another long journey to be slaughtered. In Canada, horses can legally be transported for 28 hours without access to water or feed, or rest. Investigations revealed that horses unfit for transport were loaded onto trucks, and that young horses were mixed with adults, posing a risk of them being trampled.

While animal welfare conditions on feedlots and during transport are not covered under EU requirements for imported meat, standards on welfare at the time of killing, and conditions in lairage linked to slaughterhouses, are. The audit carried out by the EU Food and Veterinary Office (FVO) in 2018 was supposed to address animal welfare, insofar as the EU Regulation 1099/2009 applies to meat imported into the EU, but the final report does not mention the regulation as a legal reference and there is only a short paragraph covering animal welfare. Access to weather protection is part of the applicable EU requirements, but it seems that the audit team did not inspect the outdoor pens of the slaughterhouse visited in Canada. These pens most often have no protection from adverse weather conditions, with documented temperatures as low as -36°C in winter. Even foals are not given shelter, and some freeze to death at birth.

The Canadian horse meat production also raises concerns related to public health. The recent EU audits revealed significant shortcomings in terms of traceability. In similar conditions, EU imports from Mexican horse meat were suspended in 2015.

Subsequently, the EU and Canada should seize the opportunity offered by CETA's Regulatory Cooperation Forum (RCF) to address concerns related to horse welfare. In the absence of any progress, the EU should consider suspending Canadian horse meat imports until the production respects required animal welfare standards. In such a case, it should also offer to Canada the possibility to cooperate in the context of CETA's RCF to address the identified animal welfare shortcomings. The EU and Canada could also rely on their cooperation under CETA's chapter on sanitary and phytosanitary measures to discuss the merits of the six month-residency rule. Indeed, while the legislation has led to externalising animal welfare concerns with horses being forced to be kept on feedlots, it is inefficient to prevent horses that have been treated with substances that are strictly prohibited in the EU for use in food-producing animals from entering the EU food chain and posing potential health risks to EU consumers.

We would be very grateful if we could get the opportunity to further exchange with you, or with your cabinet, on this matter.

Yours sincerely,

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Eurogroup for Animals

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