

A close-up, high-resolution photograph of a horse's eye. The eye is dark and glossy, reflecting the surrounding environment. The horse's skin is a rich brown color, and the texture of its coat is visible. The eye is the central focus of the image.

**EUROGROUP
FOR
ANIMALS**

REPORT

FROM STABLE TO FORK

HORSE MEAT TRADE

“Horses have accompanied humanity for centuries, putting their faith, health and welfare into our hands regardless of their roles. They served in the field, at war, on an estate, in sports, in a village, and in a city, they served poor and rich, always with the same dedication, silence and docility. It is high time to ensure their best protection.”

Janusz Wojciechowski, EU Commissioner for Agriculture

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INTRODUCTION



In 2020, just over 60 million horses were recorded as livestock worldwide by the Food and Agriculture Organisation for the United Nations (FAO), and just over 5 million of them were slaughtered the same year.¹ Equine welfare and the traceability of horses have been a topic of heated discussions in the last few years. In 2013, the European Union (EU) was shaken by its own horse meat scandal, when supposed beef products sold at retailers turned out to contain horse meat. It led many consumers to question the content of their food. The horse meat scandal remains alive with new investigations in 2021 that revealed continued malpractice of the industry.²

Longer supply chains and more operators are involved in the equine meat industry compared to other categories of meat, which increases risks for consumers and animals. This is of particular importance in relation to horse meat from non-EU countries. The EU imports horse meat from third countries where minimum welfare standards for the slaughtered animals are not met. Undercover investigations by Eurogroup for Animals' members the Animal Welfare Foundation (AWF) and GAIA, but also Tierschutzbund Zürich (TSB) and Animals' Angels Inc. USA have uncovered appalling conditions and cruelty to horses during transport, at auctions and assembly centres/holding facilities, and at slaughterhouses. Audits by the European Commission³ have similarly identified problems concerning animal welfare at the time of slaughter and

during transport (although no EU transport requirements are in place).

One particularly grim source of horses entering the horse meat chain is so-called blood collection centres, mostly located in Argentina and Uruguay. Blood collection centres (also called blood farms) are facilities where the hormone eCG (equine chorionic gonadotropin, also called pregnant mare's serum gonadotropin or PMSG) is extracted from the blood of pregnant mares. The fertility hormone is used to regulate the breeding of farm animals in Europe, notably pigs. The blood collection centres are far from respecting welfare standards. Exhausted mares, which have survived the ordeal at the blood farms, end up at slaughterhouses producing horse meat for human consumption.

Furthermore, the Non-Governmental Organisations (NGO) investigations and EU audits have identified severe deficiencies in the reliability of identification and traceability of the horses' origin. The horses are not raised and kept for human consumption, but are, for example, riding, racing or rodeo horses no longer fit for purpose. These animals are likely to have been treated with veterinary medicines, drugs and other substances deemed unsafe for human consumption. The lack of traceability thus poses a food safety concern. Nevertheless, at EU level there is little intention to introduce mandatory Country of Origin Labelling (COOL) for horse meat.

¹ FAOSTAT database run by the FAO to provide statistics for global agricultural production <https://bit.ly/3RoIBR2>

² <https://bit.ly/3phrXW7>

³ Audit reports can be accessed at the [Commission's website](#).

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BACKGROUND

Based on FAO data from 2020, the global herd size of horses classed as livestock is 60.8 million. The US, Mexico, Brazil, Mongolia, China and Kazakhstan were – in this order – the countries with the largest stock size. In 2018, the EU Member States keeping the most horses for agricultural purposes were Romania, Germany, France, Italy, Spain and Poland. Just over 5 million horses were slaughtered in 2020.⁴ The countries with the highest number of killed individuals were China, Mongolia, Kazakhstan, Mexico, Russia and Brazil (however, Kyrgyzstan and Australia ranked higher in terms of produced tonnes of horse meat than Brazil). As for the EU, the highest-ranking countries in 2019 were Romania, the UK, and Poland.⁵ The FAO data for 2019 does not include Spain's figures, and Spain had the largest number of horses in 2017.

EU consumption and total EU trade in horse meat have declined overall between 2000 and 2015. A European Commission audit report from 2013 on horse meat in the EU indeed spoke of a '*fall in popularity of horse meat for the EU consumer*'. Declines before 2013 were mostly due to a fall in horse meat production in Italy, while post-2013 decreases could be attributed to the EU horse meat scandal. Since 2015, however, at least intra-EU trade in horse meat seems to be increasing.

The EU's horse meat scandal began towards the end of 2012, when Irish authorities detected horse DNA in meat and meat products labelled as beef. In January 2013, they reported their findings, leading the UK to ask its industry to test all its beef products for horse DNA. Subsequently, products were taken off the shelves in Germany, Sweden, Belgium, the Netherlands, Ireland, the UK and Switzerland. In March 2013, the Commission announced a 5-point action plan to address the scandal and the EU Food Fraud Network was created in July the same year.

Alongside these events, AWF released findings from their investigations into North and South American horse slaughterhouses, revealing appalling conditions and malpractice, as well as fraudulent activities in relation to identification of horses. On top of that, Argentinian media reported that stolen horses were found at the slaughter plant Lamar, which was also part of the AWF's investigations. Lamar is an EU-approved slaughterhouse that exports to the EU.

Responding to public concern, the European Commission started a series of audits related to horse meat in the countries authorised for export to the EU.⁶ The authorised countries included Argentina, Australia, Canada, Mexico, Brazil, Switzerland⁷ and Uruguay. However, animal welfare and traceability issues have led to suspensions of imports from Brazil and Mexico, two important sources. The US is another, although indirect, source of horse meat. The US stopped producing horse meat in 2007, but horse meat from US animals continues to be sold in Europe as they are shipped for slaughter to Mexico (only pet food production) and Canada. The annex to this report presents each country's case.

⁴ It is not possible to determine the purpose of the killing (i.e. for human consumption or not) from the FAO data. A proportion of the horse meat may be used in the pet food market and/or to feed captive wild animals in zoos.

⁵ No data is available for 2020 or 2021.

⁶ Whether a country is authorised to export horse (or any other type of) meat to the EU is dependent on three approval processes. Firstly, the country needs to be listed for equine meat in Regulation (EU) No. 206/2010. 30 countries are currently listed and thus in principle authorised for horse meat exports to the EU. A country also has to submit a residue monitoring plan, ensuring the detection of illegally used and misused substances, and thus, ensuring food safety. 9 out of the 30 countries are listed in Decision 2011/163/EU for having an approved residue monitoring plan. The residue monitoring plan for each year and the monitoring results of the previous year's plan need to be submitted to the Commission yearly. Lastly, individual establishments seeking to export horse meat to the EU need to be authorised and added to the list of approved establishments by the country's competent authority. The country's competent authority is expected to keep this list up to date and to carry out inspections regularly at these establishments, ensuring they meet the relevant EU requirements. The Commission has to approve any new listings and can also take steps to delist establishments. As concerns the 9 remaining countries, only 5 have listed establishments: Argentina, Australia, Canada, Switzerland and Uruguay.

⁷ Switzerland is not further discussed here as it has equivalent animal welfare standards as the EU. Although it is possible that the country imports meat from non-EU countries and re-exports it to EU Member States, the country exports only sporadically and in small volumes.

3

KEY ISSUES



The key issues of the horse meat trade are: animal welfare concerns at slaughter plants and related facilities, as well as during transport, and the traceability and identification of horses (and thus food safety concerns). In addition, another concern has been raised in recent years as mares, used for the production of eCG, enter the production chain for horse meat.

3.1 ANIMAL WELFARE AT SLAUGHTER PLANTS AND RELATED FACILITIES

Investigations by AWF and Animals' Angels Inc. USA have revealed maltreatment of horses at assembly centres, during transport and at slaughterhouses in Argentina, Uruguay, Australia, USA and Canada. At the moment, EU requirements on animal welfare for imported animal products only apply to animal welfare at slaughter. As the investigations demonstrate, even those minimum requirements are not met. In fact, the international standards of the World Organisation for Animal Health (WOAH) are not met either, such as:

- Sick, weak and injured animals should receive immediate treatment or be killed humanely and immediately if necessary;
- Injured or sick animals, requiring slaughter, should be killed humanely and without delay;

- Handling should be done in a way to avoid harm, distress or injury;
- Protection from unfavourable climatic and weather conditions should be provided;
- Suitable feed should be available on arrival and at intervals appropriate to the species.

On numerous occasions, the investigations detected cases of severely emaciated, injured, lame, sick and weak horses, as well as pregnant mares and foals not separated from other horses. Animals in need of veterinary treatment were not attended to for more than a month at assembly centres. Neither were emergency kills carried out for welfare-compromised animals and suffering horses were left to die without assistance.

Untrained or incompetent staff handled the horses violently. This included for instance beating, strong water jets aimed in the animals' faces, the use of electric prods (which are prohibited in the EU for horses), and dogs used to round up the animals.

The requirements in terms of climatic and weather protection were not met either, as horses often had no shelter available. Clean and dry resting areas were lacking and/or no bedding was provided. Instead, the dirt floor would turn into mud during heavy rain. Several fences posed a considerable risk of injury. In many cases, only minimum feeding was provided, if any, causing horses to fight for food. The crowded conditions in holding pens caused stress, kicking and biting.

Thus, EU Regulation 1099/2009 on requirements for slaughterhouses were violated on numerous occasions, in particular in relation to the emergency killing of suffering horses, access to weather protection, availability of feed, the use of electric prods, etc.

Transport requirements in North and South Americas⁸ as well as Australia are also of concern. Unfit animals, as well as mares and foals mixed with other adult horses, were frequently observed being transported to slaughterhouses. The vehicles, which are cattle trucks, are usually unsuitable for such transport and bear a high risk of injuries. In these vehicles, horses are not transported in individual stalls, as required in the EU on long journeys. The countries' national legislation only insufficiently protects animals during transport and slaughter. Uruguay has no legislation on transport; Argentinian and Canadian legislations permit transport for 36 hours without food or water. Unfortunately, the EU transport requirements do not apply for imported products. Nevertheless, reports from EU audits in Mexico and Brazil have commented on poor animal welfare conditions during transport in these countries and the 2014 audit report on Argentina's horse meat sector indicated that most deaths on arrival at the slaughterhouse were due to *'inadequate conditions of transport'* or to the fact *'that some animals had pre-existing conditions which were aggravated during the transport'*.⁹

The investigations demonstrate systematic abuse, mistreatment and neglect; and the situation has not improved since 2012 despite promises of EU and Swiss importers. In response to the investigations and public concern, the Respectful Life initiative was created by the importers' association FEBEV (Belgium) and VPI (Switzerland), and entrusted to the Catholic University of Leuven for scientific oversight. However, the research conducted [does not equal a proper](#) audit and verification of animal welfare standards in the production of horse meat.

⁸ Argentina, Uruguay, Mexico, the US and Canada.

⁹ <https://bit.ly/3zQnezT>

¹⁰ EU audit in Uruguay, 2018: The assembly centres of all three slaughterhouses visited were empty, although the audit team had requested in advance that they should be in operation during the inspection. EU audit in Argentina, 2020: All horses at the assembly centre of a slaughterhouse were exchanged before the inspection, although the audit team requested at the opening meeting that the horses present should stay there until the inspection.

Other commissioned audits carried out by Société Générale de Surveillance (SGS) only considered the management system of the production unit and thus, would not have detected animal welfare issues.

Another problem is that audits and visits need to be announced and the sites visited take temporary measures to improve the conditions or are otherwise manipulated.¹⁰ These measures are, however, only short-lived, as for example, a few days after the audit, emaciated and injured horses will appear again at slaughter plants and badly built shelters for potential weather protection will collapse after a few weeks.

The pre-slaughter mortality for horses is high and the lack of veterinary treatment and emergency killings also constitutes a food safety concern. When existing injuries are not treated and extensive open wounds persist, it can be assumed that germs may spread through the horses' body. Bacteriological sampling is then necessary to determine if the derived meat is still safe for human consumption.

In addition, in the case of Canada, since horses imported from the US need to reside in Canada for six months before slaughter as per an EU regulation from 2016, prolonged suffering of horses occurs in feedlot pens. The animals are kept in those pens without access to weather protection and without veterinary treatment or emergency killing. Pregnant mares and other adult horses are mixed, also leading to foals being born unnoticed and freezing to death during the harsh Canadian winter.

In Australia, the investigation broadcast in October 2019 unveiled very poor slaughter conditions at the Meramist plant, which is approved for export to the EU. The horses were systematically tortured. They were beaten, kicked and received electric shocks. Stunning failure occurred regularly, and many horses were shot several times. Some horses were hoisted and bled while still showing signs of consciousness. The investigation also showed many dead horses being unloaded after a long-distance transport.

3.2 IDENTIFICATION AND TRACEABILITY

Identification of horses and traceability of the animals and their products has been a long-standing concern. The EU horse meat scandal in 2013 demonstrated the complexity of the long supply chains and several operators involved in the horse meat industry. In countries like Argentina and Uruguay the supply chains are even more concerning. The horses slaughtered for their meat do not stem from commercial breeding and raising for such purposes. They are riding, work or sports horses, no longer fit for purpose (due to old age, illness, injury, or declining performance), exhausted Criollo breeding mares, young horses that do not meet the criteria for breeding, and horses from blood extraction centres (for the production of eCG). These horses, also called 'descartes' (meaning 'trash'), have repeatedly changed owners through auctions and markets, or have been collected by horse dealers from farms.

Given the lack of reliability of the equine identification system in Argentina and Uruguay, the actual horses' origin is unknown. Microchipping and equine passports (including the medical history of the horse over a lifetime) are standard in the EU, but the law is not enforced and forgery of passports is an issue. For example, Belgium's Federal Agency for the Safety of the Food Chain (FASFC) found 35 forged horse passports in their six-month investigation in 2020-2021. In Argentina and Uruguay, by contrast, the usual practice involves ear-tagging and sworn statements by the last owners concerning medical treatments in the last six months. Argentinian legislation stipulates that slaughter horses are required to be ear-tagged when leaving the holding of origin and accompanied by a sworn statement, while Uruguayan legislation requires the last owner to ear-tag the animal before delivering it to a registered assembly centre.

However, even these minimal requirements are not always adhered to. AWF has repeatedly documented fraudulent activities in relation to ear-tagging, demonstrating the lack of reliability of these methods. For example, ear tags were applied at slaughterhouses or were removed upon arrival at assembly centres, and a large number of horses at assembly centres and slaughterhouses had no ear tags. Also, EU audits in these countries have identified weaknesses and deficiencies concerning identification and traceability of the animals, such as incidents of missing ear tags and lack of identification procedures (e.g. European Commission audit to Argentina in 2014). Such concerns eventually led to a halt to imports of Mexican horse meat in 2015. Such bans are, however, only implemented on grounds of food safety and not for animal welfare reasons.

Weaknesses in relation to identification, traceability and resulting food safety concerns over veterinary medical treatments have also been raised for horse meat from Australia, where most slaughtered horses are discarded racehorses, and Canada. A European Commission audit in Australia in 2015 identified, for example, weaknesses in relation to the owner's sworn statements and concerning the legal administration to horses of substances that are not authorised to be used in food producing animals in the EU. The 2019 audit remained critical on traceability and food safety stating that the recommendations of the previous audit had not been implemented, and that residue testing demonstrated the lack of reliability of vendor declarations.

Such concerns were also significant in the case of Canada, where an audit in 2015 identified deficiencies, in particular concerning horses from US origin. The Commission addressed these concerns with Commission Implementing Regulation (EU) 2016/1832, requiring US horses to reside in Canada for six months before slaughter, and requesting Canada to implement provisions for the administration of medical substances to horses that respect applicable EU rules. A residue audit in 2016 was more favourable, reporting progress on this matter. However, the 2018 audit identified issues in relation to the controls on both horses imported from the US and domestic ones, with the exception of horses kept on feedlots for six months.

On top of the lack of identification and traceability, corruption is another concern, notably in South America. Argentina ranks 85th out of 180 countries, scoring 40 out of 100 (a score of 100 indicating no corruption) according to the [Transparency International Index](#), although [corruption cases](#) have gone down by 90% in the last few years, due to a new regulatory framework.¹¹ Areas including the horse meat sector are also concerned as the 2018 audit report on horse meat to Argentina demonstrates. The report mentions that the entire staff of a local office of the competent authority responsible for inspections was dismissed in July 2018 following an investigation that confirmed corruption.

This situation makes it possible for stolen and smuggled horses to enter the meat chain. In Argentina, stolen horses have repeatedly been discovered at slaughterhouses. The Uruguayan police also has its own task force against horse smuggling from Brazil, which has been banned from importing horses due to an outbreak of glanders in 2015. A 2016 audit report by the European Commission identified the theft of horses in Southern Brazil and smuggling as a serious concern in Uruguay. Fraud and corruption led the Commission to halt horse meat imports from Brazil in 2017.

¹¹ Agriculture, fisheries and livestock fall under the same Ministry.



3.3 EQUINE CHORIONIC GONADOTROPIN (eCG)

eCG, also known as pregnant mare's serum gonadotropin (PMSG), is a hormone produced by pregnant mares approximately between the 40th to 130th day into their pregnancy. The hormone is extracted from the mares' blood and used to induce follicular growth, oestrus and ovulation in pigs, sheeps, goats and cattle. It also induces the synchronisation of these processes in animals, [to increase the number of piglets per sow per year](#) due to superovulation (larger litter sizes) and shortens the period between weaning and the next pregnancy. It is finally used for artificial insemination and embryo transfer in cattle. In Germany, for example, where 2.1 million doses are applied yearly the primary purpose of eCG is the synchronisation of sows' heat. However, the use varies between countries and species. The global sale of eCG is estimated to be around US\$65-70 million. While the systematic use of eCG and other fertility hormones is prohibited in organic farming in the EU, it is tightly linked to intensification of production. Synthetic alternatives to eCG are already available on the market but hormone-free methods, so-called zootechnical measures, such as optimal feeding, lighting and contact with male animals can induce and synchronise oestrus in farmed animals.

Several concerns arise, in particular in relation to food safety, in case of insufficient or lacking identification and traceability of horses and horse meat. Horses are in many countries primarily considered a companion animal or used for sports purposes. Only later in life, when they are no longer fit for racing or rodeos, or when owners would like to abdicate their responsibilities for the animal, do horses instead enter the food chain. However, they might have been treated with substances, such as steroids or growth promoters, that are prohibited in the EU to be used in animals for food production. As individual horses may have changed owners at several occasions throughout their lifetime, it is difficult to establish a clear medical track record.

Identification is important to ensure that no animal unfit for human consumption enters the food chain. Identification is closely linked to traceability and the reliability of any medical track records or guarantees. As the situation in Uruguay and Argentina demonstrates, identification is also important to prevent fraudulent activities, such as stolen and smuggled horses entering the food chain.

In addition, consumer protection is at risk as horse meat from third countries can be sold in the EU without having a clear label of origin. Country of Origin Labelling (COOL) for fresh and frozen equine meat would thus enhance consumer protection. Given the differences in regulations between the EU and non-EU countries and welfare and traceability problems, this would allow consumers to make informed choices.

Blood collection centres (or 'blood farms') are mostly located in Argentina, Uruguay and Iceland. [Investigations in Argentina and Uruguay](#) by AWF, exposed that the mares' welfare is severely compromised at these blood farms, due to cruel handling, lack of veterinary treatment and high volume and frequency of blood extractions. Biannual termination of pregnancy either manually or using medication is another disturbing practice. Abortions at advanced stages of the pregnancy are indeed induced in Argentina and Uruguay, which can cause complications, pain and stress, while in Iceland, the foals are generally sold for slaughter. In South America, several farms reportedly extract 10 litres of blood weekly, which is beyond the scientific recommendations on the amount and frequency of blood extraction. [European standards](#) would allow a maximum extraction of 3.4-4.5 litres once a month, depending on the horse's weight. If too much blood is taken too frequently, the mare may become anaemic, can suffer a miscarriage or will have a weakened immune system. About 30 % of the mares drop out of the production process every year; they either die in the pastures or are sold to EU-approved slaughterhouses when they no longer get pregnant.

Blood collection, which has been ongoing for around 40 years, is not covered by animal protection laws in Argentina or Uruguay. Uruguay introduced a legislation (No.215/017) in 2017 providing for the mandatory sanitary licensing of



Blood farms in Iceland. © Animal Welfare Foundation

blood collection establishments but this regulation does not specify strict requirements guaranteeing the welfare of the mares. In parallel, Uruguay also produced a manual on good animal welfare practices for eCG production, but it only contains general guidance and is not legally binding. Neither have importing countries controlled the production or asked for controls on the keeping, treatment and blood extraction methods. eCG is currently licensed for veterinary use in all EU Member States.

In 2017, the pharmaceutical company MSD Animal Health (Merck/Intervet) decided to no longer source eCG from South America. Other importing companies promised to take control of the situation by implementing training, audits and guidance (which are, however, not legally binding). Despite these promises and the publication of the manual in Uruguay, another investigation in early 2018 demonstrated that the only thing that has changed are the methods of abuse. Instead of hitting mares on their heads with sticks and wooden boards, staff were observed using iron hooks or stabbing the horses' genitals with sticks. Veterinary treatment is still not administered to injured, sick or emaciated horses, which are left to their own devices. In June and August 2018, the pharmaceutical companies IDT Biologika and Ceva Santé Animale also announced they no longer sourced eCG from South America. The EU importer Hipra (Spain) is yet to follow suit. In comparison, Zoetis, the [largest medicine and vaccination producer](#) for pets and livestock (based in the US, with a branch in Italy) has stopped EU imports of eCG in 2016. Nevertheless, the company purchases eCG from the blood farm Syntex in Argentina to distribute it outside the EU and signed [an asset purchase and manufacturing agreement](#) with Syntex in 2015.

Blood extraction is a lucrative business in Argentina and Uruguay, the latter reportedly even [subsidised one farm](#).

The biggest eCG producing company worldwide is Syntex S.A. in Argentina, with a subsidiary in Uruguay. Syntex obtained marketing authorisation for their PMSG product "Fixplan" in several EU member states in 2021. Based on the NGO investigations, Syntex in Uruguay is also one of the largest suppliers of horses for the EU-approved horse slaughterhouse Clay, having transported 795 horses for slaughter in 2014.

The AWF also found practice in Iceland that involves 100 establishments, and 5,000 Icelandic horses. In Iceland as well, the semi-wild mares are subjected to violence, they risk injury and suffer from repeated traumatisation. According to an Icelandic veterinarian, this repeated experience can lead to so-called "learned helplessness". Five litres of blood are extracted from each mare every week, which is about four times as much as international standards recommend.

3.4 LABELLING AND CONSUMER AWARENESS

Country of Origin Labelling (COOL) is a way of enabling consumers to better understand where animals have been born, reared and slaughtered. Such knowledge can empower citizens to make conscious choices. At the moment, horse meat consumers across the EU are being denied the information they need to make informed decisions.

3.4.1 Legal context

The Regulation Food Information to Consumers (EU) No 1169/2011 (FIC Regulation)¹² sets out the provision of COOL for meat from pigs, sheep, goats and poultry that is sold in the EU. For fresh or frozen unprocessed meat from pigs, sheep, goats and poultry the European Commission Implementing Regulation (EU) No 1337/2013 requires that the label must indicate where the animal was reared and slaughtered.¹³ Finally, since minced meat may come from different sources, the label must indicate whether the animal was reared and slaughtered in the EU or in non-EU countries.

The EU Marketing Standards could also facilitate the labelling of horse meat via the Common Market Organisation (CMO) Regulation that aims to ensure fair competition, standardised products and consumer protection. While the Marketing Standards regulate the

¹² Regulation (EU) No 1169/2011 <https://bit.ly/3QdWHmN>

¹³ With the exception of where it was born.



use of terms for certain types of meat, horse meat is not a regulated term. Hence, there are no requirements for sellers to deliver information to consumers on horse meat products. However, a stand-alone marketing standard regulation for horse meat and meat products¹⁴ with provisions imposing the delivery of information to consumers, such as country of birth, raising and slaughter and length of the supply chain could be enacted. Including horse meat in the scope of the FIC and CMO Regulations will not only help EU consumers make better choices and ensure consumer confidence, but it will also provide additional traceability and prevent food fraud scandals such as that of 2013 and recently of 2021. Furthermore, bearing in mind that large numbers of horses are transported for slaughter over long distances both within and outside the EU, such a development is also in line with the European Green Deal commitments of achieving sustainability and climate neutrality of food production.

The European Commission's recent evaluation of the Regulation (EU) No 1169/2011 (FIC Regulation) demonstrated the effectiveness of mandatory COOL: consumers received reliable and clear information on the provenance of products, while the increase of cost on operators and national authorities was negligible.¹⁵

3.4.2 The European Commission's current plans to extend Country of Origin Legislation

The Commission's 2021 Inception Impact Assessment (IIA) proposes the extension of mandatory COOL to two other minor meats, namely rabbit and game, but not horse meat. Much of the rabbit meat consumed in the EU comes from local sources, whereas horse meat is imported in significant quantities each year, via fragmented supply chains and with little traceability from non-EU countries like Argentina and Uruguay that have proven records of non-compliance with EU standards. There is a lack of data about EU trade and production quantities for game meat, so it is hard to calculate the impact that this legislation will have on that sector. However, it is inconceivable that whilst the mandatory COOL legislation is being extended to data-poor game meat, and locally consumed rabbit meat, but not the high-import, food safety risk horse meat seems inconceivable.

3.4.3 Consumption and market trends

While horse meat only constitutes a small part of (3%) of the total meat consumption in the EU, the horse meat industry often has longer supply chains than for other categories of meat¹⁶ in many cases relying on imports

¹⁴ Precisely, a Commission Regulation of laying down detailed rules for implementing Council Regulation 1318/2013 as regards horse meat and meat products.

¹⁵ European Commission (2020) Evaluation support study on mandatory indication of country of origin labelling for certain meats <https://bit.ly/3bO98a3>

¹⁶ According to the European Commission [Report](#) (2015).

from third countries. Such long supply chains create high environmental costs through long-distance transport of live animals¹⁷ that does not comply with the ambitions set out in the European Green Deal. Moreover, consumers can be misled by buying 'home produced' horse meat, which may stem from imported live animals that were only slaughtered in the importing country.¹⁸ For example, World Horse Welfare found that in Italy, the vast majority of horse meat consumers believe the horse meat they buy and eat is Italian, and that the origin of the meat should be Italian 'to make them feel safer'.¹⁹ As a large number of consumers prefer horse meat of national, or even local, origin offered at the same price as 'imported' meat, mandatory COOL will have an impact on transport of live horses and horse meat²⁰ and subsequently on reducing CO2 emissions. Furthermore, bearing in mind that some of the biggest exporters of horse meat to the EU are third countries where horse slaughter raises serious concerns and where standards are below the European ones, it is necessary to ensure the transparency of horse meat products on the EU Internal Market. At the moment, **non-EU producers can sell more cheaply produced horse meat on the EU market, as they do not have to adhere to the strict requirements applying to EU horse meat producers, without consumers being informed, de facto undermining EU producers.** In this context, labelling is a priority to ensure that EU consumers access information on the requirements applied to the production of the meat they choose, but it is also crucial for the EU to impose its animal welfare standards on exporters to better protect animals consumed in the EU and prevent global market distortions.

The lack of traceability and controls in the main horse meat exporting countries, as well as the diverse background of slaughtered horses, creates scope for fraud, jeopardises food safety and significantly increases health risk to consumers.²¹ Given the continuous risk related to long supply chains of horse meat, the European consumers can no longer be denied the information provided by COOL and horse meat needs to be included in the scope of the

FIC and CMO Regulations, to help EU consumers make better choices and ensure consumer confidence, but also to provide additional traceability and prevent food fraud scandals.

3.4.4 Consumer perspective

The horse meat scandal of 2013 led many consumers to question the content of their food. Indeed, two thirds of consumers changed their consumption behaviour as a result of the information on food risks that they received.²² According to Barnett et. al. (2016), in order to restore consumer and meat purchasers' confidence after the meat scandal, there is the need to improve traceability providing clearer and correct labelling and stating the origin of meat on packaging.²³ Consumers were found to associate the origin information of meat with the level of food safety, while their largest food safety concerns were related to antibiotic residues and hormone levels in meat.²⁴ Despite the public outcry in 2013, the horse meat scandal resurfaced in 2021. Operation Opson, coordinated by Europol and Interpol, investigated horse passport documents and horse meat, among other food frauds. Inspections of slaughterhouses in several countries for Opson IX, corresponding to investigations conducted from December 2019 to June 2020, revealed that about 20% of the foreign passports showed signs of forgery. Live animals and more than 17 tons of meat were seized in Belgium, Ireland, Italy, Spain and the Netherlands. The latest operation, Opson X, conducted from December 2020 to June 2021, focused on Belgium, Croatia, Denmark, France, Ireland, Italy and Spain. In parallel, investigations were conducted in several countries. Belgium's Federal Agency for the Safety of the Food Chain (FASFC) found 35 forged horse passports in their six-month investigation in 2020-2021.²⁵

Studies show that consumers want to be better informed regarding the origin of the food they consume, and are willing to pay more for receiving this information.^{26 27} A

¹⁷ Transporting meat as opposed to live horses would cut transportation costs by about 52%. pp. 23-24 <https://bit.ly/3c17FNv> and <https://bit.ly/3zWxw19>

¹⁸ Eurogroup for Animals (2019) A strategy to reduce and replace live animal transport, pp. 31 <https://bit.ly/3w3utTE>

¹⁹ World Horse Welfare (2019) A non-published study from World Horse Welfare, Horse Meat Consumer Research, Italy – Qualitative Phase.

²⁰ Eurogroup for Animals (2019) A strategy to reduce and replace live animal transport, pp. 21 <https://bit.ly/3w3utTE>

²¹ European Commission (2014) Study on mandatory origin labelling for milk, milk used as an ingredient in dairy products, and unprocessed meat other than beef, pig, poultry, and sheep and goat meat <https://bit.ly/3pg83YV>

²² European Food Safety Authority (2019) Special Eurobarometer EB91.3 "Food Safety in the EU" <https://bit.ly/3AIG0QM>

²³ Barnett, J., Begen, F., Howes, S., Regan, A., McConnon, A., Marcu, A., Rowntree, S. and Verbeke, W., 2016. Consumers' confidence, reflections and response strategies following the horsemeat incident. *Food Control*, 59, pp.721-730.

²⁴ European Commission (2014) Study on mandatory origin labelling for milk, milk used as an ingredient in dairy products, and unprocessed meat other than beef, pig, poultry, and sheep and goat meat <https://bit.ly/3pg83YV>

²⁵ <https://bit.ly/3phrXW7>

²⁶ Food Chain Evaluation Consortium (2014) Study on the mandatory indication of country of origin or place of provenance of unprocessed foods, single ingredient products and ingredients that represent more than 50% of a food <https://bit.ly/3w4yJ5z>

²⁷ BEUC (2013) Consumer survey on origin labelling on food <http://www.beuc.eu/publications/2013-00043-01-e.pdf>

2018 study²⁸ conducted by World Horse Welfare in Italy concluded that horse meat consumers consider that the labelling on fresh horse meat should be mandatory regarding the country of origin of horses (85%) and the country of slaughter (82%). Similarly, 88% of EU citizens consider it necessary to indicate the country of origin of types of meat other than beef, swine, sheep, goat and poultry²⁹ and the origin of the product was found to be the most important purchase criterion for consumers, ahead of price.³⁰ According to the Eurobarometer 2016,³¹ 59% of EU citizens mentioned they would be willing to pay more for more information given on the product label.

3.4.5 European Parliament's and stakeholder views

Considering the existing evidence, various European institutions and civil society organisations have been calling the European Commission to reconsider the extension of COOL to other types of meat.

- In 2021, the European Parliament adopted a [Motion for Resolution on the Farm to Fork Strategy](#), which calls for an import ban on horse meat from third countries that do not fulfil EU requirements.
- In 2015, the European Parliament's Committee on the Environment, Public Health and Food Safety (ENVI) adopted a Motion for Resolution³² urging the Commission to follow up with legislative proposals to make the indication of origin mandatory for meat in processed foods in order to restore consumer confidence and help ensure better traceability along the food supply chain.
- The report [Removing the Blinkers](#) (2015), which illustrates in detail the challenges concerning equine welfare in the EU, recommended the Commission extend the labelling rules. According to this report, equine meat should be subject to equivalent provisions and labelled with its country of origin, rearing and slaughter as other types of meat are required to be in

order to ensure a level playing field and welfare-aware choices by consumers.

- Members of the European Parliament (MEPs) have also urged the Commission on many occasions to extend labelling rules. In a Parliament resolution of January 2014,³³ the Commission was pressed to present legislative proposals making the indication of the origin of meat in processed foods mandatory. In 2015, they called for COOL of meat in processed foods. According to the Parliament resolution, meat used as an ingredient in processed food should be labelled by country of origin.³⁴ In 2016, MEPs reiterated once again their call for a mandatory COOL of meat and milk.³⁵ All three resolutions aimed to better inform EU consumers and improve their confidence in food products by making the food supply chain more transparent. The suggestion in all cases was that labelling the country of origin would help to ensure better traceability along the food supply chain, thus restoring consumer confidence. Additionally, in 2016, a question for written answer was addressed to the Commission regarding country of origin for meat asking when it would propose mandatory COOL for horse meat.³⁶
- BEUC – the European consumer protection organisation – recommends that origin labelling should become mandatory for all meats, milk, unprocessed foods, single-ingredient foods and ingredients that represent more than 50% of a food. This view has been maintained in BEUC's response to the roadmap on origin labelling of meat³⁷ and its response to the FIC Regulation public consultation.³⁸
- Finally, given that nine out of ten European citizens believe that imported products should respect EU animal welfare rules, the Commission has a clear opportunity to improve transparency in the food supply chain. COOL would enable consumers to purchase meat derived from short supply chains, which present benefits from an animal welfare, environmental, and food safety perspectives.

²⁸ World Horse Welfare (2019) A non-published study from World Horse Welfare, Horse Meat Consumer Research, Italy – Quantitative Phase.

²⁹ European Food Safety Authority (2013) Eurobarometer survey on food labelling

³⁰ European Food Safety Authority (2019) Special Eurobarometer EB91.3 "Food Safety in the EU" <https://bit.ly/3AIG0QM>

³¹ European Food Safety Authority (2016) Special Eurobarometer 442 "Attitudes of Europeans towards Animal Welfare" <https://bit.ly/3SPQ2Ru>

³² ENVI Motion for a Resolution. <https://bit.ly/3CahJ1o>

³³ European Parliament resolution of 6 February 2014 on Commission Implementing Regulation (EU) No 1337/2013 resolution of 13 December 2013 laying down rules for the application of Regulation (EU) No 1169/2011 of the European Parliament and of the Council as regards the indication of the country of origin or place of provenance for fresh, chilled and frozen meat of swine, sheep, goats and poultry (2014/2530(RSP)).

³⁴ European Parliament resolution of 11 February 2015 on country of origin labelling for meat in processed food (2014/2875(RSP)).

³⁵ European Parliament resolution of 12 May 2016 on mandatory indication of the country of origin or place of provenance for certain foods (2016/2583(RSP)).

³⁶ <https://bit.ly/3pkCqjE>

³⁷ <https://bit.ly/3C6G7kE>

³⁸ BEUC (2022). Revision of EU legislation on food information to consumers, BEUC response to public consultation <https://bit.ly/3SO28KR>.

4

OUR CALLS

1

STRONGER IMPORT REQUIREMENTS TO COMPLY WITH EU ANIMAL WELFARE STANDARDS

- The EU should ensure that all imported horse meat must comply with **EU animal welfare standards at slaughter** (which are currently the only applicable animal welfare requirements for imported meat).
- All imported equine meat should also respect **other animal welfare standards applied in EU horse meat production** (e.g. related to transport, assembly centres and horse feedlots).
 - In the meantime, trade agreements should only reduce tariffs on the imports of horse meat if EU-equivalent on farm and transport welfare standards are respected.
- Additional requirements on the origin of horses used for horse meat must be adopted to **prevent sourcing of horses for horse meat production from eCG farms**.
- **Imports should be swiftly suspended if EU audits demonstrate a lack of enforcement** of the applicable provisions of the regulation on welfare at the time of killing and traceability requirements.
- **Already applied suspension of imports should not be reversed unless the production meets the required EU animal welfare standards as confirmed by unannounced EU audits.**

2

IMPROVED TRACEABILITY

- **Stand-alone marketing standard regulation for horse meat and meat products via the Common Market Organisation (CMO)**, including at least country of origin, raising and slaughter should be adopted.
- **A Country of Origin Labelling (COOL) for fresh and frozen horse meat should be introduced** for greater traceability of horse meat products.
- **Traceability requirements and enforcement must be strengthened to prevent fraud across the horse meat supply chains.**

3

ADVANCED MONITORING, CONTROL AND COOPERATION

- The EU should allow the **possibility of unannounced audits of EU-approved slaughterhouses abroad**.
- The EU should work to improve horse welfare outside the EU through **cooperation on animal welfare with relevant partner countries** (at present Argentina, Australia and Canada), using technical assistance where required. This could be conducted through the creation of a Working Group to identify problems, share best practices and implement solutions.

5

CONCLUSION

NGO investigations, EU audits and scandals have all highlighted the need for greater protection of equine welfare in horse meat production, as well as for improved identification and traceability of horses in order to ensure food safety and prevent fraudulent activities. Eurogroup for Animals is lobbying the European Commission, Council and Parliament to improve equine protection. In particular, we are pushing for conditional liberalisation of horse meat and cooperation on equine animal welfare through mechanisms provided in free trade agreements, as well as mandatory COOL for horse meat and derived products.

6

ANNEX

6.1

HORSEMEAT PRODUCTION AND EU CONSUMPTION



ARGENTINA

Argentina is currently the biggest supplier of horse meat to the EU (2020). Since 2007, nine EU audits took place and the country's slaughter plants and their suppliers have also been under investigation by animal protection organisations. European institutions have been long aware of issues with identification and traceability of horses. Already in 2007, an EU audit in Argentina made a recommendation 'to develop and implement clear, realistic and appropriate procedures for horses' holding registration, identification and movement controls', as EU requirements were not met.

In response, Argentina launched a pilot project in January 2008 on identification and traceability. A February 2008 audit's preliminary assessment judged the project as adequate. Another audit in June the same year on residues, however, criticised the absence of veterinary treatment records at farms. Another four EU audits between 2010 and 2012 were overall favourable, although they identified deficiencies in relation to traceability and criticised the lack of verification of owners' statements concerning medical treatments, as well as inefficient review of the EU-approved establishments list. No immediate risks were recorded for human or animal health.

In 2010, GAIA conducted the first NGO investigation in Argentina, which revealed blatant abuses. In 2013, AWF published another investigation into the transport conditions and malpractices at the EU-approved Argentinian slaughterhouse Lamar, which coincided with the Argentinian media scandal concerning the discovery of stolen horses at the same plant and the EU horse meat scandal. The European Commission scheduled another audit in 2014 that was satisfactory overall but mentioned detected deficiencies on animal welfare, identification with ear tags, traceability and the vendors' declarations on veterinary treatments.

Despite recommendations by the audit team and guarantees from Argentina to improve conditions, AWF

revealed in other investigations in 2015, 2016 and 2017 that nothing had changed. The next EU audit in 2018 again concluded as favourable overall despite deficiencies, on the basis that new legal provisions on traceability would come into force in Argentina in March 2019. The report also highlighted animal welfare concerns:

'The occurrence of deaths of horses in acopios [horse assembly centres] over a substantial period of time without being recorded or detected implies that official services would not be aware of possible animal welfare or other issues, and not be in a position to intervene in a timely fashion, where necessary.'

Despite recurrent deficiencies related to identification, traceability and animal welfare of slaughtered horses, the European Commission has not acted in any significant way. In 2019 and 2020, AWF released films and a report about [new investigations in South America](#), yet again demonstrating the appalling conditions and maltreatment of the horses, as well as persisting issues with traceability. The investigations also clearly demonstrate only short-lived changes made at slaughter plants and related sites just before industry or EU audits.



BRAZIL

EU audits in Brazil have detected deficiencies in the traceability of the horses' origin and the residue status (concerning veterinary drugs and other substances) of equine meat in at least four EU audit reports since 2008. A report on a horse meat audit of September 2015 also mentions 'serious animal welfare problems prior to or during transport that the FBO [Food Business Operator] should have detected and taken measures to prevent'. The EU audit team had observed dead and weak animals (which should have been deemed unfit for transport) arriving, as well as a lack of animal welfare assessment upon the animals' arrival, meaning that emergency killings were carried out too late. The report recommended taking appropriate actions 'in order to address high mortality rates'.

The Brazilian competent authorities provided guarantees they had addressed the recommendations and deficiencies after each audit. However, in March 2017, a federal police investigation (operation 'Carne Fraca') was launched in Brazil, involving 21 major meat-producing companies. The



© Seb Alex / We Animals Media

companies had sold contaminated meat nationally and internationally, for example by changing expiration dates, using chemicals to change the meat's appearance and mask bad smells, or injecting water into the meat to increase its weight. In addition, officials carrying out controls at these establishments were suspected of corruption.

In response to this scandal, the European Commission carried out another audit on meat in May 2017, and a follow-up in January/February 2018. The 2017 audit identified critical deficiencies, seriously questioning the overall credibility of official controls, guarantees provided on exported meat and meat products, as well as guarantees provided in response to previous audit recommendations. The European [Commission took steps](#) for all involved facilities (including all horse meat slaughter plants) to be removed from the list of establishments eligible for exports to the EU, and requested that the Brazilian authorities stop submitting requests for the addition of new establishments. A regime of reinforced checks for Brazilian meat and meat products was also introduced. The follow-up audit did not look into horse meat production as establishments for horse meat were no longer listed nor had been requested to be listed.



AUSTRALIA

In 2007, Australia introduced a new system whereby horses must be accompanied by a horse vendor declaration (HVD), which has to include information on veterinary treatments during the last six months. An audit by the European Commission the same year identified this as 'a clear step forward in providing a basis for certification of horse meat to the EU'. Weaknesses in traceability remained, however, as a 2008 audit report observed. The following three audits between 2009 and 2012 confirmed recurring deficiencies in horse identification.

In 2014, the Australian Department of Agriculture received a [complaint](#) that the horse meat would not meet EU requirements, as horses in a particular saleyard in Northern Victoria would sell horses without HVDs. The complaint was passed on to the European Commission, which carried out another audit in November 2015 on residues. The audit found weaknesses in owner statements on the treatment of horses with veterinary medicines. Although concerns were raised over the use of substances in horses that are not authorised to be used in food producing animals in the EU, the audit team also remarked that residue testing for these substances was part of the Australian residue monitoring plan.

Australia only has two horse slaughter plants (both approved for exports to the EU).³⁹ In such a vast country, this means that horses are likely to have travelled long distances prior to slaughter. Journeys from Victoria to Queensland or South Australia can last several days. Transport is not well monitored nor regulated. Australian standards on land transport of horses allow for horses to be transported for up to 24 hours without water, and up to 36 hours if water is provided (which is unusual and rare). Given the lack of enforcement, journeys might well be extended to 48 hours when horses remain on board of trucks without food and water, during a driver's required resting periods. In November 2019, an Australian NGO documented the journey of horses travelling from an assembly centre in Mooropna, Victoria, to the Meramist plant in Caboolture, Queensland. The journey time reached around 30 hours. During that period, the horses were not unloaded for the mandatory 12-hour break during which they should be watered, fed and rested. Journeys in general are stressful to horses and research demonstrates that even six hours of travelling can cause a suppression of the immune system, indicating welfare problems. Herding and holding of the horses can also lead to aggression, fear and injuries.

³⁹ The plant in South Australia no longer slaughters horses since mid 2019, although it is still approved to do so.



Emaciated discarded racehorses at an assembly centre in Australia. © Animal Welfare Foundation

Horses are generally not considered animals for food production in Australia. The two Australian horse slaughter plants produce meat primarily for the foreign market. When Western Australia granted a licence to one butcher to sell horse meat for domestic human consumption in July 2010, protests followed. The domestic market remains small, as this butcher apparently only slaughters [20 horses per year](#).

In October 2019, the undercover footage of ex-racehorses being mistreated and cruelly killed at Meramist abattoir caused a huge public scandal.⁴⁰ The film “The Final Race”, broadcast by ABC, shocked Australians. This scandal triggered an official Inquiry, which concluded that Australian animal welfare standards for both slaughter and transport of horses fall below WOAHS standards, and that many factors such as poor design of the slaughterhouse, inappropriate handling of horses or the use of electric prodders, lead to poor welfare outcomes and cannot be prevented under current legislation. The 2019 audit report published by the EU still criticises the traceability and food safety in this sector.



As in all the countries discussed so far, identification, traceability and animal welfare issues also have a long-standing history in Canada. The European Commission has been well aware of these problems for several years. For example, a 2007 audit report concluded that ‘*the eligibility of the horses to be slaughtered for export to the EU is not verifiable due to the lack of a proper identification and registration for the animals and the farm or other place of origin ensuring the traceability of the animals*’. The audit team also noted that animal welfare controls, in particular in relation to proper killing of horses, did not meet EU requirements. Another audit in the same year on residues, equally stated that there were no guarantees for the

absence of certain (prohibited) substances due to the lack of medical records.

A 2010 audit report recorded changes in the Canadian system. Horses destined for slaughter now had to be accompanied by an affidavit signed by the last owner, documenting the horse’s identity, medical treatment in the last six months and stating that no growth promoters were used. However, the audit report pointed out that those affidavits were not verifiable for horses coming from the US;⁴¹ thus concerning the majority of slaughtered animals. The main concern about horses from US origin is the administration of substances that are strictly prohibited in the EU for use in food animals (such as phenylbutazone or anabolic steroids). The issue remained unresolved, as confirmed in a 2011 audit.

Following the horse meat scandal in the EU and Argentina, a report from a 2014 audit in Canada even spoke of ‘*serious concerns in relation to the reliability of the controls over both imported and domestic horses destined for export to the EU. It cannot be guaranteed that horses have not been treated with illegal substances within the last 180 days before slaughter*’. The audit team also noted an issue with consignments re-entering Canada after having been rejected and returned to the US on animal welfare grounds.

In 2016, Commission Implementing Regulation (EU) 2016/1832 came into force, requiring that horses have to be resident in a country for six months before slaughter (unless a monitoring plan had been applied to the animals in the six months before their slaughter). Thus, Canada can no longer slaughter horses directly upon arrival from the US but has to keep the animals for six months. The Commission also requested Canada to put provisions in place on the administration of medical substances to horses that respect applicable EU rules. The audit in the same year on residues was satisfactory, recording progress. [Another audit](#) took place in 2018 to verify whether these new requirements had been met. The document still identified issues linked to the reliability of controls on both imported horses (coming from the US) and domestic ones, with the exception of horses kept on feedlots for a six-month period.

The new regulation, however, has negatively impacted the horses’ welfare, as AWF [investigations from 2019](#) demonstrate. The animals are kept in open-air feedlots, without any protection from the weather or veterinary care for six months until they can be slaughtered. The investigations showed that suffering horses are left to die

⁴⁰ <https://ab.co/2JoQfMq>

⁴¹ The 2007 audit report mentioned that between 2004 and 2006 about 16,000 live horses were imported annually from the US for immediate slaughter. These figures were expected to increase, given the ban on funding for horse meat inspection in the US.



Feedlot run by the Bouvry Slaughterhouse, with no shelter - Alberta, Canada. © Animal Welfare Foundation

without assistance, and new-born foals freeze to death in winter. These issues now need to be added to already existing problems in relation to animal welfare at the time of slaughter and during transport. Transport is indeed an area that warrants further attention, as long transport times are common with only two slaughterhouses in all of Canada and many horses that are of US origin. In Canada, horses can legally be transported for 28 hours without water, feed or rest. In addition, [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). Thus, serious welfare concerns arise over the length of transport, as well as its conditions.

MEXICO

In 2020, Mexico was the fourth largest producer of horse meat worldwide, and slaughtered 580,000 horses. The country exported 2,600 tonnes of horse meat in 2016, primarily to Vietnam, Russia and Japan. However, before 2015 the EU was the main market destination for Mexican horse meat, in particular Belgium and the Netherlands. Notably, around 85% of horses slaughtered in Mexico used to be of US origin.⁴² So-called US kill buyers acquire working, racing and companion horses, mainly at auctions, to be transported to horse slaughter plants in Mexico and Canada.

Two audits in 2008 detected issues with the traceability of horses and concluded that it could not be guaranteed that EU requirements were always met. In addition, one report observed poor welfare conditions in the lairage (place where animals are kept before slaughter); yet no recommendations to improve animal welfare were made. The same report also concluded that the establishments could be considered compliant overall, and that no immediate risks to human or animal health were identified.

Following a more favourable 2010 audit that had not identified any major shortcomings, a 2011 audit on residues concluded that *'the guarantees given on horse meat exports to the EU are insufficient to guarantee that equivalent standards to those provided for by EU legislation are applied'*. An audit in 2012 came to the same conclusion, criticising identification methods and the lack of traceability of horses and their medical records.

The European Commission carried out another audit on horse meat production, certification and residues in Mexico in June/July 2014 – subsequent to the EU horse meat scandal, investigations by animal protection organisations and public concern. The report concluded that no significant improvements in relation to identification, traceability and residues had been made since audits held in 2011 and 2012, despite guarantees provided by the Mexican authorities. Official controls were found to be deficient or completely lacking on live animals (in particular in authorised assembly centres, where identification of the animals should take place).

As horses in Mexico and the US are not considered to be food producing animals until they are designated for this purpose, widely available substances prohibited for food producing animals can be legally administered. No controls are in place to verify the authenticity and reliability of the affidavits (sworn statements) provided by horse owners, stating the medication history and a declaration on non-use of prohibited substances. In addition, the audit team noted serious animal welfare issues during transport and at arrival at the slaughterhouses. Indeed, the auditors' conclusion states:

'While EU requirements regarding Animal Welfare during transport are not applicable in third countries, the findings of this audit corroborate information received from various nongovernmental organisations and confirm the very poor conditions in which horses are transported.'

Although the report stated that the residue monitoring plan had been largely implemented, with no relevant findings in Mexico or at EU border inspection posts in recent years, the approval of the residue monitoring plan for Mexico was suspended in December 2014 (and applied as of 2015). This decision was based on the absence of reliable checks to attest that prohibited substances had not been administered to the animals. The suspension of approval constitutes a de facto import ban of Mexican horse meat and derived products. The suspension, however, could be reversed if Mexico provides sufficient guarantees on its controls, and another audit confirms that the deficiencies have been rectified.

⁴² Based on the European Commission audit report from 2014, which contains data provided from food business operators to the Mexican authorities between 2010 to mid 2014.



THE UNITED STATES

The US used to produce horse meat up until 2007, primarily for export to the EU rather than domestic consumption. In 2006, however, the US Congress banned funding for the United States Department of Agriculture for inspecting horse slaughterhouses. This constitutes a ban on commercially produced horse meat, as meat cannot be traded without having been inspected. Notably, it has been suggested that individuals could still [slaughter horses for their personal use](#).

Although the law does not explicitly prohibit the slaughter, only the sale of horse meat, no more horse slaughterhouses have existed in the US since 2007. Thus, owners looking to abdicate their responsibilities for their horse could opt for costly euthanasia, abandonment of the animal, or selling the horses at auctions and to kill buyers. The latter buy horses that are then transported to Mexico or Canada for slaughter and horse meat production. Hence, since the de facto ban, 160,000 horses have been transported every year from the US to Mexico and Canada in order to be slaughtered there. Animal protection organisations have [documented the cruel conditions](#) to which the animals are subjected in the US at auctions, in export feedlots, during transport and at the slaughterhouses in Mexico and Canada.

Between 2011 and 2014, the ban was temporarily lifted by the Obama administration in order to control a rising equine population. Abattoirs were proposed, but ruled out by individual towns. The administration under Trump proposed to ease the ban again in May 2017, arguing that selling horses for slaughter would save considerable costs related to the feeding of wild horses. The funds for this measure, however, would not be allocated to [USDA inspections](#), meaning the animals' meat cannot be sold. In April 2019, a bill was introduced at the US Congress, which if passed, would deem equine meat as unsafe for human consumption as the horses receive drugs and substances not approved for use in animals intended for food production. The bill, entitled the [Safeguard American Food Exports Act](#) (SAFE), would also outlaw the live export of horses for purposes of human consumption on the same grounds.



URUGUAY

The Uruguayan horse meat case strongly resembles the situation in Argentina. Inadequate identification, lack of traceability and animal welfare issues are widespread and have been known to the European Commission for quite some time. This is demonstrated by a 2007 and a

2009 audit report criticising these points. In relation to animal welfare, the 2007 report mentions for example that *'measures taken for stunning horses are not enough to ensure that they are spared avoidable pain or suffering during slaughter'*.

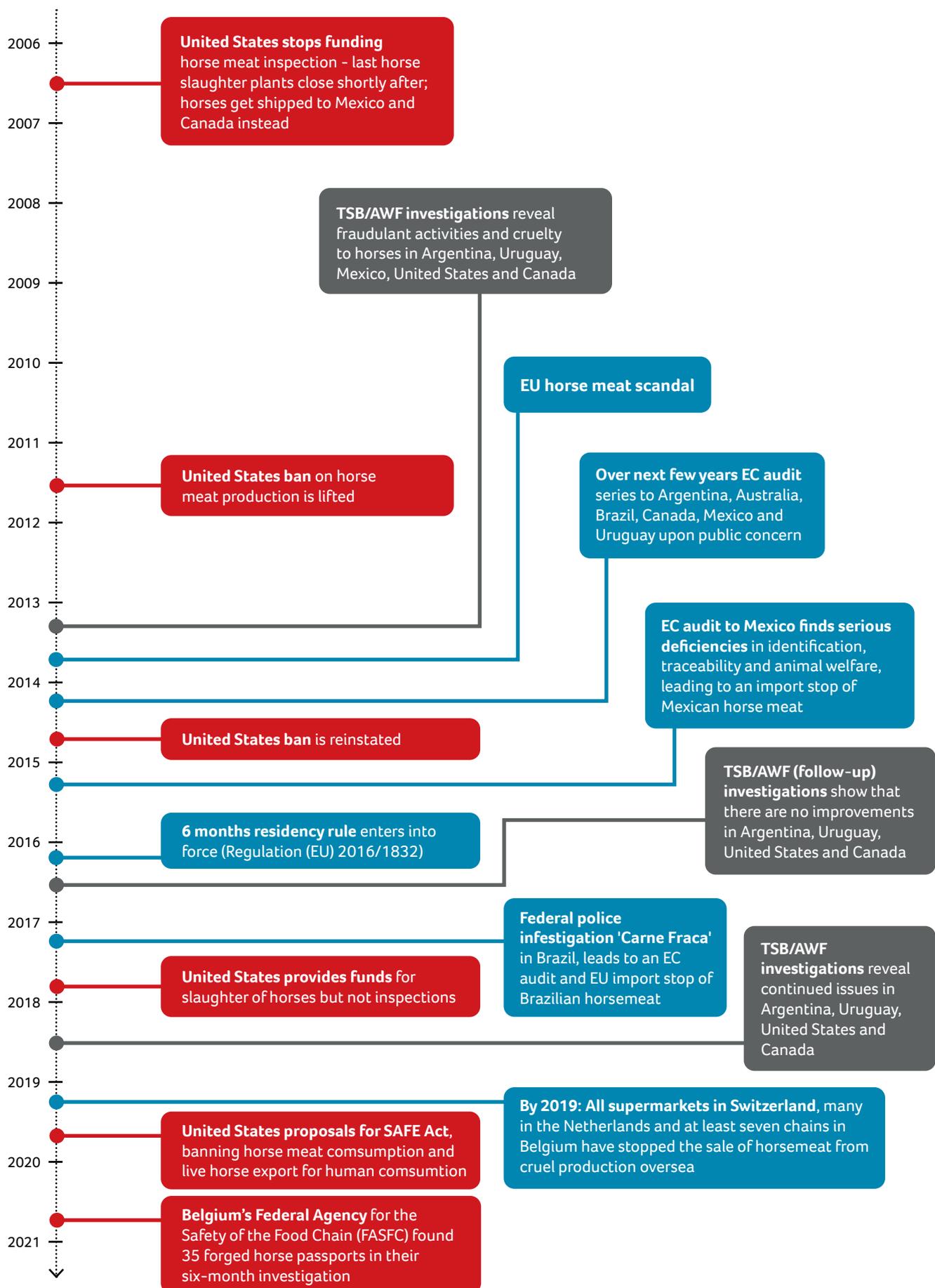
Audits in 2010 and 2015 on residues were more favourable, noting progress. The more positive conclusion was based on Uruguay's decision to exclude sport horses from the food chain, which should be verifiable as sport horses are obliged to be microchipped. In addition, the country had communicated they would implement an affidavit system after 2015 (i.e. horses need to be accompanied by a sworn statement on their origin and medical treatments).

A 2016 audit on public health, however, found that the system in place did not provide adequate guarantees, in particular in relation to the requirements for residency at holdings, administration of veterinary treatments and for animal welfare at the time of killing. In addition, the audit team was informed of an ongoing problem with smuggling and theft of horses from Brazil. The 2018 audit report similarly found weaknesses in this regard. Interestingly, the audit team was unable to assess controls at the slaughterhouses' assembly centres in 2018, as none of them were found to be in operation – contrary to the specific request from the audit team before the audit, as stated in the report. Furthermore, the report highlighted significant animal welfare issues:

*'As regards animal welfare, and although previous shortcomings in relation to stunning and bleeding were corrected, **the official controls in the assembly centres do not ensure that EU and national welfare requirements are met, and were not effective in correcting established non-compliance. Moreover, and although the centres were found not in operation and no animals were therefore present, the centres' records on the one hand, and the condition of the centres on the other, clearly indicate that when in operation and with the numbers of animals present, animal welfare would be compromised.***

These audits happened alongside AWF's investigations, released in 2014, 2017, 2018 and 2019, into the cruel conditions to which horses are subjected, as well as the fraudulent practices in relation to identification of horses at EU-approved slaughterhouses in Uruguay. The investigation published in 2019 also indicates that changes made by slaughter plants and related facilities just before the audits are only short-lived.

6.2 TIMELINE OF MEASURES



CANADA → France, Finland, the Netherlands, Luxembourg, Belgium

Bouvry Export Calgary Ltd
Fort Macleod, Alberta

Viande Richelieu Inc./Richelieu Meat Inc.
Massueville, Quebec

ARGENTINA → The Netherlands, Belgium, Italy, France, Finland

Frigorífico Lamar SA
Mercedes, Buenos Aires

Infriba S.A.
Batan, Buenos Aires

LAND I S.A.
Rio Cuarto, Cordoba

Solemar Alimentaria S.A
Chimpay, Rio Negro

AUSTRALIA → Belgium, France

Meramist Pty Ltd
Caboolture, Queensland

Samex Peterborough Pty Ltd.
Peterborough, South Australia
(Currently not slaughtering horses)

URUGUAY → The Netherlands, Belgium, France

Frigorífico El Amanecer
Agroindustrial Del Este S.A.
Treinta Y Tres)

Frigoríficos Clay SA
Totoral, Canelones

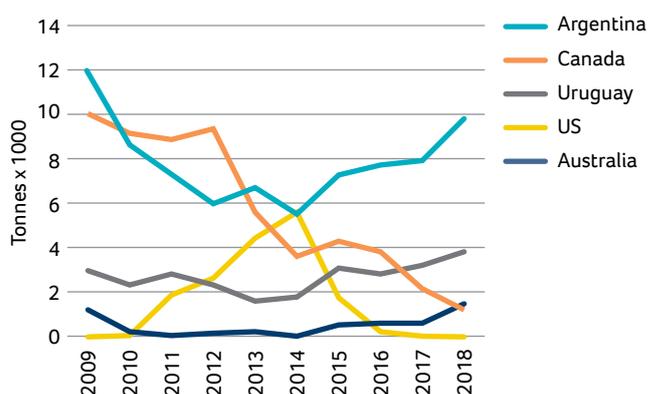
Frigoríficos Sarel SA
Sauce, Canelones

6.3 STATISTICS

In 2021, the EU imported 14,827 tonnes of horse meat, mostly from Argentina (9,615 tonnes), Uruguay (3,996 tonnes), Canada (679 tonnes), Iceland (262 tonnes), Australia (152 tonnes) and the United Kingdom (123 tonnes). Up to 2018, Brazil and Mexico were also relevant sources, until the EU no longer approved Mexico's residue monitoring plan in 2015, and all Brazilian horse meat slaughterhouses were removed from the list of approved establishments in April 2017. Looking at the supplied tonnes per country over the last ten years, the most important sources of horse meat in descending order are Argentina, Canada, Mexico, Uruguay, Brazil, the US⁴³ and Australia.

Since Argentinian export volumes of horse meat reached their lowest level in 2014 (5,547 tonnes), they have risen by 77%. Canadian exports decreased by 66% between

Figure: EU imports of horse meat



2014 and 2018 (from 3,739 tonnes to 1,266 tonnes) and imports from Uruguay increased by 110% over the same period (from 1,834 tonnes to 3,854 tonnes). The Canadian decrease might be related to unfavourable EU audits, investigations by animal protection organisations, as well as the decrease in the supply of US horses.

⁴³ Slaughter of horses for human consumption has been de facto banned in the US since 2006 and the US is not authorised to export horse meat to the EU (as it lacks an approved residue monitoring plan and approved establishments). The available data in Eurostat most likely refers to horses of US origin that were slaughtered in Canada (or in Mexico before 2015).

In 2020, there were four EU-approved slaughterhouses in Argentina, three in Uruguay, two in Canada and two in Australia. The table below provides an overview of these establishments (the names given are as provided to the European Commission, and the city and region where the slaughter plants are located).

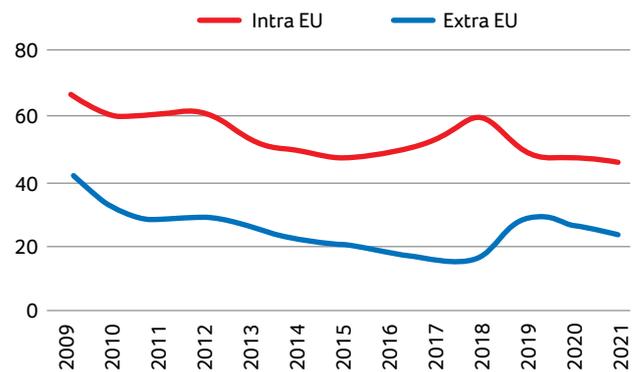
The production of horse meat in Argentina and Uruguay primarily serves the European market. Based on FAO production and export figures for 2020, Argentina exported 52% of the horse meat that they produced. Uruguay exported 67% of its production volume (47% of which was destined for the EU market), Canada 19% (26% of which was shipped to the EU), and Australia 2% (51% of which went to the EU).⁴⁴

The primary destinations for horse meat are the Netherlands, Belgium and Italy; but also Luxembourg, France, Finland and Germany. The table below provides an overview of the main entry points for horse meat from each third country supplier (given in descending order in relation to import volumes). It is important to note that with statistics provided by Eurostat, it is nearly impossible to track the subsequent movement of the meat on the European market.

Argentina	the Netherlands, Belgium, Italy, France, Finland
Canada	France, Finland, the Netherlands, Luxembourg, Belgium
Uruguay	the Netherlands, Belgium, France
Australia	Belgium, France

Despite increased exports to the EU from Argentina, Uruguay and Australia over the last few years, the total volume of horse meat originating from non-EU countries has fallen (extra-EU). Internal EU trade, which can include re-export from meat originating from outside the EU (intra-EU), also experienced a decline up until 2015. Since then, trade numbers have been rising, with 2018 volumes almost reaching volumes traded pre-2013, i.e. before the EU horse meat scandal.

Figure: EU horse meat trade (in 1000 tonnes)



6.3.1 The trade in horse meat within the EU

The table below shows the quantity of meat from horses, asses, mules or hinnies that was exported from an EU Member State to another (intra-EU27) in 2019, 2020 and 2021 in tonnes.⁴⁵

	2019	2020	2021
Romania	7,847	8,295	10,646
Belgium	9,664	9,305	9,199
Netherlands	9,652	8,051	8,870
Poland	7,253	7,438	7,137
Spain	6,864	8,254	5,264
France	2,601	2,107	2,293
Italy	1,328	1,733	1,116
Luxembourg	755	678	493
Bulgaria	757	600	462
Germany	208	307	286
Denmark	154	332	170
Croatia	66	27	129
Lithuania	235	163	88
Ireland (Eire)	616	1	0
United Kingdom	439	0	0
Others	100	43	83
Total	48,537	47,354	46,237

⁴⁴ It is likely that the majority of the produced horse meat is for non-human consumption, for example used in pet food, which is, however, not acknowledged in the export data. Domestic consumption in Australia is most likely very small as horses are not considered food producing animals and only one butcher in Western Australia was granted a licence to sell horse meat for human consumption. The butcher stated that he slaughters 20 horses per year.

⁴⁵ Note. These data were accurate as of 11/2/22 and were taken from the Eurostat databases. The figures are indicative, and are sometimes subject to changes made by the Statistical Office of the European Union.

Table: Extra-EU amount of horse meat, fresh, chilled or frozen in tonnes, exported outside the EU in 2019, 2020 and 2021

	2019	2020	2021
Italy	713.1	834.3	902.2
France	884.2	694.6	902.2
Belgium	478.2	522.5	747.5
Poland	342	257.6	454.6
Bulgaria	180	284	222.2
Germany	25.2	19.6	20
Netherlands	90.8	28.5	16.1
Spain	1.1	0.7	1.7
Ireland (Eire)	137.5	0	0.1
Total	2,852	2,642	4,385

Overall, the European trade of horse meat (combining exports to EU and non-EU countries) is dominated by Italy, Belgium, the Netherlands and France. All four countries also imported significant amounts of horse meat from outside the EU, including from Argentina, Canada, Uruguay and Australia (see previous section). In comparison, countries leading in terms of EU internal export volumes (including potential re-exports) are Romania, Belgium and the Netherlands. For the Netherlands and Belgium, it can be assumed that a significant volume of their exports to EU Member States are re-exports, meaning that the countries export meat that they imported from outside the EU. The countries importing the most horse meat in 2021 were the Netherlands, Belgium, Italy and France.



ITALY

Italy was the biggest importer of horse meat from EU countries in 2021, importing a total of 24,524 tonnes. In addition to importing horse meat from countries outside of the EU (2,129 tonnes in 2021), Italy imported horse meat from 13 EU countries. Italy imported the most horse meat from Belgium (6,091 tonnes), Poland (5,937 tonnes), Spain (3,722 tonnes), France (2,338 tonnes), and the Netherlands (595 tonnes).

Italy was also the 7th biggest exporter of horse meat in the EU during 2021, and exported 1,116 tonnes to 14 EU countries. Italy exported the most to Sweden (420 tonnes), Belgium (284 tonnes), Germany (150 tonnes) and Hungary (132 tonnes).



BELGIUM

Belgium was the second biggest importer of horse meat from EU countries in 2021, importing a total of 11,853 tonnes. As with Italy, Belgium also imports large quantities of horse meat from outside of the EU (2,719 tonnes in 2021), as well as from 13 EU countries. Belgium imported the most horse meat from the Netherlands during 2021 (5,060 tonnes), followed by Romania (3,886 tonnes), Italy (770 tonnes), France (760 tonnes), Bulgaria (668 tonnes) and Spain (527 tonnes).

Belgium is also the second exporter of horse meat to EU countries in 2021 (9,199 tonnes), partnering with 15 EU countries. Most of their exports went to France (4,040 tonnes), followed by Italy (2,638 tonnes), Germany (1,398 tonnes) and the Netherlands (564 tonnes).

Belgium is a key player in the global equine meat trade. Belgian companies either (co)own several (EU-approved) abattoirs or engage in joint ventures with local partners in North and Latin America, Australia and New Zealand. For example, the EU-approved slaughterhouse Lamar in Argentina is mentioned by the Belgian meat trading company Equinox under 'Our brands'. The EU-approved slaughterhouse Sarel in Uruguay belongs to the Belgian importer Multimeat. The Belgian firm Benimplex NV belongs to Multimeat, the parent company of Australia's largest abattoir Meramist, and shares similar directors; and Samex Peterborough processes its meat for the Belgian Velda NV. The majority of horse meat imported by Belgium is then subsequently re-exported to other EU Member States; the primary destinations being France, Italy, the Netherlands and Germany. Notably, many supermarkets in the Netherlands, at least seven chains in Belgium and all in Switzerland have stopped the sale of horse meat from cruel production overseas, in response to the investigations and awareness raising by Eurogroup for Animals' members (such as AWF and GAIA).



FRANCE

France was the third biggest importer of horse meat from EU countries in 2021, importing 6,563 tonnes of horse meat from 10 EU countries, which is in addition to their imports from non-EU countries (1,207 tonnes in 2021). In terms of intra-EU trade, France imported the most horse meat from Belgium (3,589 tonnes), followed by the Netherlands (947 tonnes), Italy (626, tonnes) and Luxembourg (465 tonnes).

France was also the sixth biggest exporter of horse meat in 2021, and exported 2,293 tonnes of horse meat to 9 EU countries. Most of France's exported horse meat went to Italy (1,219 tonnes) followed by Belgium (610 tonnes) and Germany (184 tonnes).



NETHERLANDS

The Netherlands were the eighth biggest importer of horse meat from EU countries in 2021, and imported 508 tonnes of horse meat from 17 EU countries, as well as importing large amounts from non-EU countries (7,526 tonnes in 2021). In 2021, the Netherlands imported the most horse meat from Belgium (473 tonnes), Bulgaria (19 tonnes), and Germany (6 tonnes).

In 2021, the Netherlands was also the third biggest exporter of horse meat to other EU countries, and exported 8,870 tonnes to 25 EU countries. The Netherlands exported the most horse meat to Belgium (6,388 tonnes), followed by France (1,153 tonnes), and Italy (678 tonnes).



GERMANY

In 2021, Germany was the 4th biggest importer of EU horsemeat, importing 1148 tonnes mostly from Belgium (930 tonnes), France (68 tonnes) and Romania (60 tonnes). In 2021, Germany was the tenth largest exporter of horse meat to other EU countries with 286 tonnes exported mostly to the Netherlands (147 tonnes), France (62 tonnes) and Austria (37 tonnes).



ROMANIA

Romania was not a major importer of horse meat in 2021, importing only 169 tonnes from four countries (Belgium, Italy, Germany and Hungary).

Romania was the biggest exporter of horse meat to EU countries in 2021 though, and exported 10,646 tonnes to eight EU countries. Most of their exports went to Italy (5,759 tonnes), followed by Belgium (3,310 tonnes) and Bulgaria (1,050 tonnes).



SPAIN

Spain was the ninth largest importer of EU horse meat in 2021, importing 355 tonnes from eight EU countries, mostly from Portugal (287 tonnes).

Spain was the fifth largest exporter of horse meat to EU countries in 2021 though, and they exported 5,264 tonnes of horse meat to five EU countries. They exported the most to Italy (4,587 tonnes) followed by Belgium (359 tonnes) and France (276 tonnes).

6.3.2 The trade in live horses for slaughter within the EU

The table below shows the number of live horses who were exported for slaughter within the EU (Intra EU27) in 2019, 2020 and 2021.

EU country	2019	2020	2021
Austria	0	1	0
Belgium	2618	306	4483
Bulgaria	0	261	80
Croatia	0	841	979
Denmark	0	0	1
France	0	5584	4582
Germany	0	21	0
Hungary	0	234	220
Ireland (Eire)	9	4	263
Italy	30,639	2	1
Lithuania	0	62	0
Netherlands	123	7151	4820
Poland	0	6364	3952
Romania	0	2279	1672
Slovenia	22	1670	1781
Spain	7839	1066	945
Sweden	0	15	0
Total: EU - 27 countries	41,250	25,861	23,779

Overall, EU internal exportation of live horses in 2021 was dominated by the Netherlands, France, Belgium and Poland while imports were dominated by Ireland, Italy, Spain and Belgium. EU Member States also sent 1533 horses for slaughter to non EU countries : 625 from France to Japan, 540 from Italy to Ethiopia, 366 from Ireland to UK and 2 from Spain to an undefined country. It is worth mentioning that these figures only cover live horses traded for slaughter, excluding other live horses of low value (other than pure bred breeding) that have been traded and could have been slaughtered. These figures are therefore likely to be underestimated.



ITALY

Italy was the largest importer of live horses for slaughter in 2021, importing 28,983 live horses for slaughter from 13 EU countries. Most of their imported horses came from Poland (7,733), followed by Romania (6,615), Spain (6,086) and France (4,295).

Italy was not a major intra-EU exporter of live horses for slaughter in 2021 only exported one horse to Germany - but it did send 540 horses outside the EU.



SPAIN

Spain was the second largest importer of live horses for slaughter in 2021 and imported 5,676 horses from five EU countries. Most of their imported horses came from France (2,376), Ireland (1,633) and the Netherlands (1,554).

Spain was the eighth largest exporter of live horses for slaughter in the same year, and exported 945 horses to three countries. Of these, 660 horses went to Italy, and 285 to France.



BELGIUM

Belgium imported 1,645 live horses for slaughter in 2021 from EU countries, making them the third largest importer. Of the six countries Belgium imported from, most horses came from the Netherlands (1,040) Denmark (336), and France (259).

Belgium was also the third largest exporter of live horses for slaughter within the EU, sending 4,483 horses mostly to Germany (4410), although a further 31 went to the Netherlands, and 25 to France.



NETHERLANDS

The Netherlands did not import any live horse in 2021 for slaughter from the EU.

However, they were the largest exporter of live horses, sending 4,820 horses to 14 EU countries. Of these, Germany received the most (2,914), followed by Belgium (1,808).



POLAND

Poland was the fourth largest intra-EU importer of live horses for slaughter in 2021, with 438 horses from three EU countries (among which 245 from Germany).

Poland was also the fourth biggest exporter of live horses, exporting 3,952 horses to Italy.



FRANCE

France were not major importers of live horses for slaughter in 2020 (1 horse), but they were the second largest exporter, exporting 4,582 horses to three EU countries. Most of these horses went to Italy (4,124), followed by Spain (413).



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