SUMMARY

Audit reports by the European Commission and investigations by Tierschutzbund Zürich (TSB), the Animal Welfare Foundation (AWF) and Animals’ Angels USA (Advocacy & Investigations) have repeatedly recorded animal welfare concerns in horse meat production (during transport, at assembly centres and slaughterhouses), as well as grave shortcomings in relation to identification and traceability of the horses (and thus food safety). While animal welfare and traceability issues have already led to the suspension of imports from Brazil and Mexico; Australian, Argentinian, Uruguayan and Canadian horse meat continues to be imported by the EU despite longstanding concerns.

Key improvements to ensure better equine protection include:

- All imported equine meat must comply with EU animal welfare standards at slaughter (which are currently the only applicable requirements for imported meat).

- All imported equine meat should also respect other animal welfare standards applied in EU horse meat production (e.g. on transport, in assembly centres and in horse feedlots).

- Suspension of imports from countries if audits demonstrate a lack of enforcement of the regulation on welfare at the time of killing and traceability requirements.

- Suspension of imports (e.g. from Mexico and Brazil) are not reversed unless the production meets the required EU animal welfare standards as confirmed by EU audits.

- Working to improve equine welfare outside the EU through cooperation on animal welfare with relevant partner countries (at present Australia, Argentina and Canada), using technical assistance where required.

- Greater traceability of horse meat products by introducing Country Of Origin Labelling (COOL) for fresh and frozen equine meat.
Background

Some of the key issues of the horse meat trade are animal welfare at slaughter plants and assembly centres, and the traceability and identification of horses (presenting food safety concerns). In 2018, the EU imported 16,700 tonnes of horse meat, mostly from Argentina (9,830 tonnes), Uruguay (3,860 tonnes), Australia (1,440 tonnes) and Canada (1,270 tonnes). Imports have overall increased (except from Canada). The primary destinations for horse meat are the Netherlands, Belgium and Italy, in no particular order.

**Animal welfare at slaughter plants and related facilities**

Reports from European Commission audits on horse meat have regularly highlighted animal welfare concerns. Audits in Uruguay in 2007, 2016 and 2018 and in Argentina in 2014 and 2018 identified issues concerning animal welfare at the time of slaughter. The last Argentinian audit also indicated that officials would not be aware of animal welfare problems as the deaths of horses are not recorded at assembly centres.

Notably, in a response to a written question by MEP Anja Hazekamp on animal welfare issues detected during the 2016 audit to Uruguay, the European Commission only stated that ‘the [2018] report indicates that shortcomings in relation to stunning and bleeding from the previous audit were corrected.’ However, the same report also concluded that ‘the official controls in the assembly centres do not ensure that European Union 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.’

In addition, investigations by Tierschutzbund Zürich (TSB), the Animal Welfare Foundation (AWF) and Animals’ Angels USA (Advocacy & Investigations) have revealed shocking conditions and maltreatment of horses at slaughterhouses and assembly centres in Argentina, Uruguay\(^1\), Canada\(^2\) and Australia\(^3\). Currently, only EU rules on welfare at the time of killing are applied to imported products (EU Regulation 1099/2009); and even those minimum requirements are not met on numerous occasions as the investigations have documented.

Violations occur, for example, in relation to the emergency killing of suffering horses, access to weather protection either natural or man-made, availability of feed and the use of electric prods (which are prohibited in the EU for horses). Although EU transport requirements do not apply for imported products, reports from EC audits in Mexico and Brazil have also commented on poor animal welfare conditions during transport in these countries. A report on Argentina also indicated that most deaths on

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1. https://www.youtube.com/watch?v=IqwBVAicpvQ&t=453s
2. https://www.youtube.com/watch?v=4tSwUmmqmgf&t=188s
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”.4

The investigations demonstrate systematic abuse, mistreatment and neglect; and the situation has not improved since 2012. As audits and visits need to be announced, the visited sites take temporary measures to improve the conditions. As revealed by NGOs investigations, these measures are, however, only short lived, as for example, the day after the audit emaciated and injured horses will appear again at slaughter plants and badly built shelters for potential weather protection will often collapse after a short period of time.

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

**Identification and traceability**

Identification of horses and traceability of the animals and their products has been a long-standing concern. Identification is important to ensure no animal unfit for human consumption enters the food chain. Horses slaughtered for their meat do not stem from commercial breeding and rearing for such purposes, but are riding, work or sports horses, exhausted Criollo breeding mares, young horses not meeting the criteria for breeding, and horses from blood extraction centres (for the production of eCG).5 Thus, these animals might have been treated with substances, such as NSAIDS, steroids or growth promoters, that are prohibited from being used in animals for food production in the EU. Identification is also closely linked to traceability, the reliability of veterinary records or guarantees and the prevention of fraudulent activities (such as unfit, stolen and smuggled horses entering the food chain).

As these horses have repeatedly changed owners through auctions and markets, or have been collected by horse dealers from farms, traceability and establishing a clear veterinary track record are problematic. Microchipping and equine passports (including the veterinary history of the horse over a lifetime) are required in the EU. In contrast, practices in Argentina and Uruguay involve ear-tagging and sworn statements by the last owners concerning veterinary treatment in the last six months.

EU audits in these countries have regularly identified weaknesses and deficiencies concerning identification and traceability of the animals, such as incidences of missing ear tags and lack of identification procedures (e.g. [EC audit to Argentina in 2014](https://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3375)). In addition, TSB and AWF have also

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5 Equine chorionic gonadotropin (eCG) or pregnant mare’s serum gonadotropin (PMSG) is a hormone extracted from pregnant mares’ blood and used to induce and synchronise oestrus and ovulation in animals, such as pigs. Investigations in Argentina and Uruguay demonstrated that the mares’ welfare in the blood collection centres is severely compromised, due to cruel handling, lack of veterinary treatment, poor technique in collection of blood, and induced abortions at advanced stages of the pregnancy, which can cause complications, pain and stress. The blood extraction business Syntex in Uruguay was identified in the investigations as one of the largest suppliers for the EU-approved horse slaughter house Clay, having transported 795 horses for slaughter in 2014.
repeatedly documented fraudulent activities in relation to ear tagging. Given the lack of reliability of the equine identification system in Argentina and Uruguay, the horses’ actual origin is unknown.

Similar concerns have been raised concerning Australia, where most slaughtered horses are discarded racehorses. The latest audit in the country (2019) remained critical on the reliability of owner’s sworn statements and the administration to horses of substances that are not authorised to be used in food producing animals in the EU.

On top of the lack of identification and traceability, corruption is another concern. The 2018 audit report by the European Commission on horse meat from Argentina mentions that the entire staff of the local competent authority responsible for inspections was dismissed in July 2018 following an investigation that confirmed corruption and underperformance. A 2016 audit report also identifies smuggling as a serious concern in Uruguay.

Lastly, 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 in relation to identification, traceability and animal welfare. This is de facto undermining EU producers. In addition, consumer protection needs to be enhanced by introducing Country Of Origin Labelling (COOL) for fresh and frozen equine meat, given the differences in regulations between the EU and non-EU countries and welfare and traceability problems. This would allow consumers to make more informed choices.