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April 19, 2012

**VIA FEDERAL EXPRESS**

The Honorable Thomas J. Vilsack  
Secretary of Agriculture  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

**Re: Notice of Legal Issues Concerning the Resumption of Horse Slaughter in the United States**

Dear Secretary Vilsack:

Schiff Hardin has been retained to represent Front Range Equine Rescue ("FRER") and The Humane Society of the United States ("The HSUS") in their efforts to ensure that the USDA complies with all procedural and substantive requirements with respect to the slaughter of horses for human consumption in the United States. I am writing to follow up on The HSUS' recent letter of February 1, 2012 concerning the possibility of new horse meat operations in response to Congress' decision to reinstitute funding for inspection of horse slaughter facilities, and the pending and impending applications of slaughter establishments for inspection by the Food Safety and Inspection Service ("FSIS").<sup>1</sup> The purpose of this letter is to point out additional compelling concerns that the USDA must address in connection with its obligation to prepare an environmental review under the National Environmental Policy Act ("NEPA") before horse slaughter may be carried out in the United States. If the agency does not comply with those requirements, our clients will take appropriate legal action to enforce this obligation.

NEPA is the "basic national charter" for protecting the environment, intended to minimize risk to human health and safety, assure beneficial uses of the environment without degradation, and balance resource uses with high standards of living.<sup>2</sup> NEPA ensures

<sup>1</sup> See Letter from Jonathan R. Lovvorn, Senior Vice President, The Humane Society of the United States, to Secretary of Agriculture Thomas J. Vilsack (Feb. 1, 2012), available at [http://www.humanesociety.org/assets/pdfs/horse/usda\\_horse\\_slaughter\\_let\\_020112.pdf](http://www.humanesociety.org/assets/pdfs/horse/usda_horse_slaughter_let_020112.pdf) ("Lovvorn Letter").

<sup>2</sup> 42 U.S.C. § 4331 *et seq.*; 40 C.F.R. § 1500.1.



The Honorable Thomas J. Vilsack  
April 19, 2012  
Page 2

consideration of these policy goals by requiring federal agencies, including USDA, to follow specific procedures in evaluating the environmental consequences of their projects prior to taking certain actions.<sup>3</sup> Because of the exceptional potential for disruption of the environment caused by horse slaughter facilities, NEPA review would be required for USDA to approve any permit application for inspection of a horse slaughter facility. In order to be eligible for inspection pursuant to the FMIA, a horse slaughter facility must apply for inspection, and review of that application necessarily involves USDA assessing detailed paperwork regarding the premises, standard operating procedures, and management of waste-streams, including sewage and water.<sup>4</sup> NEPA review is mandated for the establishment of new horse slaughterhouses, as well as for the conversion of existing slaughterhouses, currently processing other species, into operations involving horses.

As you are aware, the USDA (and all federal agencies) generally must include an environmental review for every recommendation for "major Federal actions significantly affecting the quality of the human environment."<sup>5</sup> "Actions" include adoption of official policy, such as rules and regulations, and approval of specific projects – like horse slaughter facilities – by permit or other regulatory decision.<sup>6</sup> Whether an action "significantly" impacts the environment depends on "context" and "intensity," including its effect on public health and safety and the degree to which the effects are controversial, among other factors.<sup>7</sup> Agency action "affects" the quality of the human environment if the action is the foreseeable, "legally relevant," or proximate cause of the effect.<sup>8</sup>

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<sup>3</sup> See 42 U.S.C. § 4332(2)(C); *City of Alexandria, Va. v. Slater*, 198 F.3d 862, 866 (D.C. Cir. 1999).

<sup>4</sup> 9 C.F.R. § 416.2; see also General Information, Applying For a Grant of Inspection, USDA, available at [http://www.fsis.usda.gov/PDF/Grant\\_of\\_Inspection.pdf](http://www.fsis.usda.gov/PDF/Grant_of_Inspection.pdf) ("Prior to the inauguration of inspection, when the owner or designee believes they have met the necessary requirements (e.g., developed a written Sanitation SOP, conducted a hazard analysis and HACCP plan, prepared labels, and facility), to start operations they will notify their contact person. Upon notification to your assigned contact Frontline Supervisor (FLS), the D M or designee will schedule a date and time to conduct an on-site review of the establishment and documents by inspection personnel. If all items meet regulatory requirements, a 'Conditional Grant of Inspection' will be issued.")

<sup>5</sup> 42 U.S.C. § 4332(C); *Humane Soc. of U.S. v. Johanns*, 520 F. Supp. 2d 8, 19 (D.D.C. 2007).

<sup>6</sup> 40 C.F.R. § 1508.18(b)(1), (4).

<sup>7</sup> *Id.* § 1508.27(a)-(b).

<sup>8</sup> *Dep't of Transp. v. Pub. Citizen*, 541 U.S. 752, 769 (2004) (legally relevant cause); *Metro. Edison Co. v. People Against Nuclear Energy*, 460 U.S. 766, 774 (1983) (proximate cause). Under the most rigorous type of review, an agency must prepare an Environmental Impact Statement ("EIS").

(Footnote continued on next page)



The Honorable Thomas J. Vilsack

April 19, 2012

Page 3

Both the USDA's issuance of updated rules regarding horse slaughter and its approval of slaughter facility permit applications are major Federal actions that significantly affect the quality of the human environment. USDA rule changes and permit approvals are "actions" because they constitute the adoption of official policy and the approval of specific projects.<sup>9</sup> Further, USDA rule changes and permit approvals regarding horse slaughter are "major" actions with "significant" impacts because (1) most horse meat contains chemicals that are harmful to humans,<sup>10</sup> (2) horse slaughter operations cannot be carried out without significant negative impacts on the local environment, including the water supply, (3) horse slaughter facilities detract from the quality of life in surrounding areas,<sup>11</sup> and (4) horse slaughter for human consumption is controversial nationally.<sup>12</sup>

The environmental threat caused by killing horses for food is unique in the slaughter industry, because of the following facts:

1. American horses who are slaughtered come from a variety of original owners, none of whom contemplate that the horses they are raising will someday be meat.
2. Americans provide their horses with extensive medical care, injecting, feeding and treating them with many medications and substances on a constant basis.
3. As part of their daily care, American horses are given a large number of different drugs and other substances, many of which are either outright prohibited for use

*(Footnote continued from previous page)*

identifying the effect of the proposed action, unavoidable adverse environmental effects, and available alternatives, among other factors. 42 U.S.C. § 4332(C); 40 C.F.R. § 1505.2. In some circumstances, an agency need not prepare a full EIS but may determine based on an "Environmental Assessment" ("EA"), a document more concise than an EIS, that the proposed action would not have a significant impact on the environment. *Pub. Citizen*, 541 U.S. at 758-59; 40 C.F.R. § 1501.4(a)-(b).

<sup>9</sup> See 40 C.F.R. § 1508.18(b)(1), (4).

<sup>10</sup> See "Banned and Dangerous Substances Commonly Given to Horses Sent to Slaughter"; see also Declaration of Hilary Wood, ¶¶ 6-7; Declaration of Peggy W. Larson, ¶ 7; Declaration of Joanne Pavlis, ¶¶ 4-5; Declaration of Randy Parker, D.V.M., ¶¶ 7-9. All the documents cited in this footnote are attached to this letter.

<sup>11</sup> See *id.*; see also Lovvorn Letter.

<sup>12</sup> <http://www.prnewswire.com/news-releases/aspc-a-research-confirms-americans-strongly-oppose-slaughter-of-horses-for-human-consumption-138494089.html>. As you may be aware, detailed evidence of these facts is provided in the aforementioned Petition for Rulemaking.



The Honorable Thomas J. Vilsack

April 19, 2012

Page 4

in animals to be slaughtered for human consumption or otherwise present an unknown threat to people who eat the meat of those horses.

4. Any facility slaughtering thousands of horses will necessarily be processing the blood, organs, and remains of animals whose tissues and blood may contain significant amounts of dangerous substances, which are either known to be dangerous, or which have never been tested on humans and therefore present completely unknown dangers.<sup>13</sup>

In the *Johanns* case, the court held that "the environmental effects of horse slaughter operations themselves should have been assessed pursuant to NEPA. . ."<sup>14</sup> That court's conclusion that the establishment of a horse slaughter facility merited environmental review is especially notable, because *Johanns* did not even address the core and compelling environmental concerns raised by this letter, most notably with respect to the concerns over the infiltration of American horses' tissues with a wide range of prohibited substances. That is, the *Johanns* court did not have any information before it regarding the uncontrolled administration of prohibited and dangerous drugs and substances to horses throughout their lifetimes. Specifically because of the multitude of drugs given to horses, both their meat and the waste of horse slaughter create a significant potential for a negative impact on the environment and public health and safety. The message of *Johanns* is greatly amplified by the facts presented here: horse slaughter involves the dissemination of an endless array of drug residues in virtually every slaughtered animal, which represents an undeniable basis for triggering NEPA review. According to *Johanns*, NEPA mandates that slaughter facilities cannot begin slaughtering horses for human consumption until USDA prepares an EIS or EA for each facility.<sup>15</sup>

Given the available information regarding dangerous drugs and other substances contained in American horses and their meat, each horse slaughter facility will need to face the special problems of disposing of the blood, organs, and unusable parts of horses, all of which

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<sup>13</sup> Sanitation workers in DeKalb, Illinois identified the local horse slaughter plant's effluent as especially problematic, expressly because of the presence of all the drugs and dangerous substances that horses are given that are prohibited from use in horses used for meat. Jane Allin, *When Horse Slaughter Comes to Town*, p. 4 (Mar. 2011), available at [http://www.horsefund.org/resources/When\\_Horse\\_Slaughter\\_Comes\\_to\\_Town\\_Updated\\_March\\_2011.pdf](http://www.horsefund.org/resources/When_Horse_Slaughter_Comes_to_Town_Updated_March_2011.pdf). The efforts to eliminate the byproducts of horse slaughter – blood, entrails, and body parts – have led to hundreds of violations of local wastewater and environmental laws. *Id.*

<sup>14</sup> *Johanns*, 520 F. Supp. 2d at 27.

<sup>15</sup> See, e.g., *id.* at 38.



The Honorable Thomas J. Vilsack  
April 19, 2012  
Page 5

may contain those dangerous substances. This raises concerns under NEPA that have likely never been considered by the agency and were not addressed by the court in the *Johanns* case.

Additionally, under the Federal Meat Inspection Act ("FMIA"), animals to be slaughtered for human consumption must be inspected in accordance with the "rules and regulations" prescribed by the Secretary.<sup>16</sup> The USDA must update its existing regulations, directives, and other policy documents to ensure the "efficient execution" of the FMIA, especially in light of the facts contained in this letter and in the Petition for Rulemaking submitted by this office to the USDA on April 9, 2012, as well as the new export requirements imposed by the European Union, a significant importer of horse meat.<sup>17</sup> For example, new rules and regulations must be adopted because, as established by the Petition, horse slaughter and horse meat entail different aspects of animal welfare (concerning the manner in which horses should be handled when going through the slaughter process) and food safety (regarding the myriad drugs and substances to which they may have been exposed) and environmental protection (discussed above). And given the impending heightened requirements and stringent monitoring that will be required for horse meat exported to the EU as of 2014, horses and horse meat will soon be subject to restrictions that can only be accomplished by new rules and regulations for the processing of horses and horse meat.

NEPA review is also required, as a separate matter, because the renewal of horse slaughter operations, if it occurs, will result in a change of the status quo, which is that horse slaughter has been prohibited and currently is not occurring on American soil.<sup>18</sup> USDA issuance of updated rules to ensure the efficient execution of the FMIA, and USDA approval of horse slaughter facility permit applications, if adopted, will constitute a new regulatory framework.<sup>19</sup> Any change in the status quo with respect to these facilities is subject to NEPA.

USDA's issuance of updated rules and approval of inspections for permit applications would also be legally relevant causes of the consequences of horse slaughter facilities because

<sup>16</sup> 21 U.S.C. §§ 603(a), 621.

<sup>17</sup> See *Residues of Veterinary Products, Third Countries*, Europa Website, available at [http://ec.europa.eu/food/food/chemicalsafety/residues/third\\_countries\\_en.htm](http://ec.europa.eu/food/food/chemicalsafety/residues/third_countries_en.htm) (describing new EU regulations that ban horse meat from horses that have been treated with any of a list of identified prohibited substances and establish maximum residue limits of pharmacologically active substances permitted in food animals).

<sup>18</sup> See *id.*

<sup>19</sup> See *id.*



The Honorable Thomas J. Vilsack  
April 19, 2012  
Page 6

these effects predictably result from horse slaughter operations.<sup>20</sup> Any USDA regulations directly addressing inspection and approval of slaughter facility permit applications also would have that same effect, and also would require NEPA review.<sup>21</sup>

Until the USDA undertakes an environmental review of the impact of horse slaughter facility operations, as required by the NEPA and *Johanns*, horse slaughter inspections in the United States may not begin. If the USDA resumes inspections without complying with NEPA and *Johanns*, FRER and HSUS will take all available legal means to enforce compliance with the law.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Wagman".

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Attorneys for Front Range Equine Rescue

BAW:lfl  
Enclosures

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<sup>20</sup> See *id.* at 20 (finding that an interim final rule that sanctioned a fee-for-service inspection program for horse slaughter facilities was "reasonably causally related" to the environmental effects of horse slaughter operations).

<sup>21</sup> See *id.* at 38.

## **DECLARATION OF HILARY WOOD**

I, Hilary Wood, declare as follows:

1. I am the President and Founder of Front Range Equine Rescue ("FRER"), a 501(c)(3) nonprofit organization incorporated in Colorado. I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection. If called, I could and would testify to these facts in a court of law.
2. Petitioner FRER is a Colorado-based nonprofit group incorporated under Section 501(c)(3) of the Internal Revenue Code. FRER is dedicated to stopping cruelty and abuse of horses through rescue and education. FRER is actively involved in the rescue, rehabilitation and adoption to good homes of domestic and wild horses found at auctions and horses destined for slaughter; and in educational efforts regarding responsible horse ownership, the cruelty of horse slaughter and wild horse roundups. FRER has assisted thousands of horses through its rescue and educational programs. While some of FRER's horses are surrendered by their owners or rescued when abandoned, many are rescued from livestock auctions; others are purchased at feed lots before they are sent to slaughter.
3. FRER directly rescues approximately 100 – 120 new horses per year. FRER horses live at facilities owned by FRER, at private foster homes, or at other privately contracted facilities.
4. One of FRER's primary goals is to purchase horses destined for slaughter for human consumption. Once rescued, FRER provides for the direct care and rehabilitation of these horses, provides training assessment, and then adoption into permanent and suitable homes for them.
5. I have personally been housing and providing for the care of horses for over twenty years.
6. In connection with my work with FRER and my own personal ownership of horses, I have become intimately familiar with the drugs, treatments and substances used by horse owners in America.

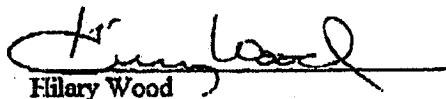
7. I assisted in the preparation of and have reviewed Exhibit 1 to the Petition for Rulemaking being submitted by FRER. Every item on that list is either commonly found in barns housing horses, and is used on those horses, or is found in catalogues and supply stores, for sale to private horse owners in America or available with a veterinarian's prescription. I am personally familiar with and use or have used at least 50 of the substances on that list, and am informed and believe that all of those substances are used regularly on companion, pleasure and recreation, and competition/show horses.

8. FRER has rescued horses from auction lots who were born as wild horses, captured by the federal Bureau of Land Management ("BLM"), and eventually ended up for sale. I have also directly adopted wild horses from the BLM. Records that accompanied these horses showed that they received some of the drugs on Exhibit 1, including but not limited to a series of vaccinations for many diseases, dewormers, which are labeled as prohibited for use in animals which will be eaten.

9. As part of FRER's mission, I have participated in the purchase of slaughter-bound horses directly from lots that were the horses' last stop before slaughter. Many of those horses, who would have entered the slaughter process otherwise, were sick with contagious respiratory illnesses. Many others developed serious illnesses, such as *Streptococcus equi* ("strangles"), a virulent and highly contagious equine infection, within a week of our acquisition.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge and experience.

Executed this 19<sup>th</sup> day of March, 2012, in Larkspur, Colorado.

  
Hilary Wood

## **DECLARATION OF RANDY PARKER, D.V.M.**

I, Randy Parker, declare as follows:

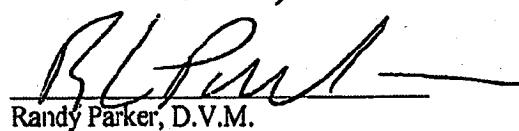
1. I am a veterinarian and own and manage Range View Equine Associates in Elbert, Colorado. I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection.
2. I am a 1989 graduate of Tufts University School of Veterinary Medicine, and have been practicing veterinary medicine for twenty-three years. After graduation from Tufts, I did an internship on Prince Edward Island, focusing on large animal, food animal and equine practice.
3. After my internship I moved to Colorado where I have been in practice ever since. My veterinary practice focuses almost exclusively (greater than ninety percent) on the care of companion horses, and horses used in competition, show and sporting events.
4. I see an average of thirty horses every week as part of my practice.
5. In the course of my practice I prescribe medications needed by the horses I treat. I also visit the barns, tack rooms, and treatment areas in which my clients' horses live, and regularly observe the kinds of drugs, substances, and treatments my clients use for their horses, whether prescribed or acquired elsewhere.
6. I have reviewed Exhibit 1 to the Petition for Rulemaking submitted by Front Range Equine Rescue. I am familiar with the large majority of the drugs, treatments and other substances on Exhibit 1, which I have either prescribed myself or seen at the barns of and in use by my clients for their horses.
7. Many of the drugs on this list are harmful to humans. For example, chloramphenicol is known to cause aplastic anemia and other problems. Nitrofurazone, which is commonly used, is a human carcinogen. Additionally, the administration of any antibiotic to horses, if those horses were then eaten, could lead to the development of antibiotic resistances in humans.

8. The majority of drugs, treatments and substances on Exhibit 1 to the Petition are regularly and routinely used by owners of horses in the areas where I work, and I believe this practice to be common throughout the country.

9. Based on my training and experience, it is my professional opinion that an alarming majority of American horses who are sent to slaughter for human consumption may have been treated with a variety of drugs, treatments and substances that renders their flesh dangerous to people who eat horse meat and makes the horses' meat unsafe for human consumption.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge and experience.

Executed this 17 day of March, 2012, in Elbert, CO



Randy Parker, D.V.M.

**DECLARATION OF PEGGY W. LARSON, DVM, MS, JD**

I, Peggy W. Larson, declare as follows:

1. I am a doctor of veterinary medicine, currently practicing in Vermont. I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection.
2. As described in the attached Curriculum Vitae, I am a licensed large animal veterinarian and have been practicing veterinary medicine for over 45 years. I received a Doctorate of Veterinary Medicine from the University of Ohio in 1965, a Masters of Science in comparative pathology from the University of California at Davis in 1968, and a Juris Doctorate from Vermont Law School in 1988.
3. From 1968 to 1978, I was a practicing large animal veterinarian in North Dakota, focusing on food animal and equine medicine and surgery. I performed diagnosis, treatment, and surgery, and frequently assessed, observed, and treated horses in my professional capacity.
4. I served as a Veterinary Medical Officer for the United States Department of Agriculture (USDA) from 1979 to 1985. In this capacity, I managed federal livestock disease control programs in Vermont, performed animal welfare inspections at circuses and research facilities, and issued federal health certificates on export animals.
5. In 1984, I was appointed by the Governor of Vermont to the position of Vermont State Veterinarian and Acting Chief of Livestock and Meat Inspection. In this position, I managed ongoing livestock and meat inspections programs and rewrote Vermont's meat and poultry inspection regulations. For approximately four months, I inspected all of Vermont's slaughter facilities until a permanent veterinary meat inspector was hired.
6. As a veterinarian and a former USDA employee, I am familiar with the variety of drugs, substances and treatments given to American horses. I also have personal

knowledge regarding the issues surrounding the slaughtering of horses for human consumption, including the sources from which horses for human consumption originate, and horse slaughter welfare issues in general. As a large animal veterinarian, I have observed horses first hand in small and large communities throughout the country.

7. I have reviewed Exhibit 1 to the Petition for Rulemaking submitted by Front Range Equine Rescue. Based on my experience and knowledge of the industry, I am informed and believe that many of the drugs, substances and treatments listed on Exhibit 1 are commonly used on American horses in the companion, competitive and sport areas. Many of those drugs are prohibited for use in horses intended for human consumption, and others have never been tested on humans to determine the effect of ingestion, or the degree to which any residue of these drugs, treatments and substances remains in horses who have been exposed to them.
8. Based on longstanding medical and scientific principles, it is impossible to declare horse meat safe for human consumption when the horses who are slaughtered for that meat have been exposed to an unidentified (and unidentifiable) number of drugs, treatments and substances, in unknown (and unknowable) quantities, at various times during their life.
9. In order for horse meat to be safe for human consumption, each of these drugs will have to be identified and the following will have to be determined: the length of time the drug is present in the horse after the last administration of the drug, what drug residuals remain after a specified waiting period, how much residue is allowable in the meat, and the toxic effects of the drug in humans, including humans who may have special sensitivities or medical conditions that may make them more susceptible to these drugs.
10. In order for horse meat to be safe for human consumption, a testing method will have to be developed to identify and quantify each of the drugs, treatments and

substances commonly used on American horses. Until these criteria are met, horse meat has to be deemed unsafe for human consumption.

11. Based on the foregoing and my training and experience, it is my professional opinion that American horses who are sent to slaughter for human consumption have potentially been treated with a variety of drugs, treatments and substances that potentially renders their flesh dangerous to people who eat horse meat and makes the horses' meat unsafe for human consumption.
12. Horses bound for slaughter are frequently shipped for long distances, and sometimes in a manner that fails to accommodate their unique temperaments and physical requirements. See C.L. Stull, *Response of Horses to Trailer Design, Duration, and Floor Area During Commercial Transportation to Slaughter*, J. ANIM. SCI. 77:2925-2933 (1999). Transported horses are often not given food and water every 28 hours, despite the federal law. T.H. Friend, *A Review of Recent Research on the Transportation of Horses*, 79 J. ANIMAL SCI. E32 (2001) ("Continuous transport of slaughter horses for 30 hours is common, and some trips last 36 hours or longer.").
13. Because of the methods of transport, horses often suffer a variety of injuries and illnesses during transport. See, e.g., K.A. Houpt & S. Lieb, *Horse Handling and Transport*, LIVESTOCK HANDLING AND TRANSPORT (2000) (describing "moderately severe back injuries" in transported horses); G. Giovangnoli, M. Trabalza Marinucci, A. Bolla & A. Borghese, *Transport Stress in Horses: An Electromyographic Study on Balance Preservation*, 73 LIVESTOCK PRODUCTION SCIENCE 247 (2002). The lack of proper food and water in already weakened animals can lead to further injuries, illness and death during extended transport.
14. Consequently, many horses may arrive at the slaughterhouse too sick or injured to stand up and walk. If they are ill, the microorganisms and other infecting agents would taint their meat and render it unsafe for human consumption.

15. The horses that survive transport are put into holding pens at the slaughter plant. These pens often lack shelter and expose the horses to extreme temperatures, rain and snow. This further increases the chances of disease and infection, and the possibility that the horses' meat will have dangerous microorganisms or other problems that could make their flesh dangerous if it was turned into meat.
16. As summarized in one study, "slaughter horses have usually been trucked for extensive distances. Many times they are injured or unhealthy, housed poorly, fed and watered improperly, and sometimes held for long times, as much as a week, in dirty confined pens at the slaughter plant." Gary D. Anderson & Don R. Lee, *Salmonella in Horses: A Source of Contamination of Horsemeat in a Packing Plant Under Federal Inspection*, 31 APPLIED AND ENVIRONMENTAL MICROBIOLOGY 661 (1975). This type of situation creates great potential for the growth of bacteria that can lead to severe health problems in humans who eat the meat of these horses.
17. During my tenure as a meat inspector in Vermont, I inspected slaughter animals, mostly dairy cattle. I became quite familiar with the behavior of these animals as they proceeded through the slaughter process. Even tame dairy cattle can become quite agitated in a slaughter plant. These animals are away from familiar surroundings, often for the first time in their lives, and they are often forced to move with an electric prod and they react accordingly.
18. Horses are more easily frightened than cattle. Horses can become particularly frightened, because they are historically prey animals. Consequently, based on my experience with large domestic animals, I believe that horses are uniquely unsuited to processing at a slaughter plant. It is very difficult to secure a horse's head which diminishes the effectiveness of the captive bolt. Sometimes horses have to be hit several times with the captive bolt, causing tremendous suffering before they are effectively rendered unconscious. Subsequently, it is highly probable that some horses may not be rendered unconscious when hung and bled.

Horses are also more likely to injure themselves trying to escape the runway in the slaughter plant.

19. According to USDA documents, there are numerous documented cases of inhumane slaughter of horses, ranging from improper handling to outright abuse.

As explained by a USDA inspector working at the Cavel plant in Illinois:

I observed the plant manager herding horses into the alley way to the knock box. Nine horses were overcrowded in the alleyway causing undue excitement which was further exacerbated when two or more employees from the kill floor began yelling and hitting these horses causing the one in the end of the line to slip and fall.

Likewise, on March 13, 2005, a USDA inspector at the Cavel plant reported:

Eight horses were in the alleyway leading directly to the knock box. The employee who is routinely assigned to work on the kill floor, hanging the horses on the rails, was using a riding crop to whip the horse in the alleyway closest to the knock-box. This horse continued to move backwards, away from the knock-box causing the other horses behind it to be overcrowded. As the whipping continued the horses in the alleyway became extremely excited. I immediately told the employee to stop but he did not listen to me. During this time, the last horse in the alleyway attempted to jump over the alleyway wall and became stuck over the top of the wall. Eventually it had flailed around enough to fall over to the other side of the wall.

\* \* \*

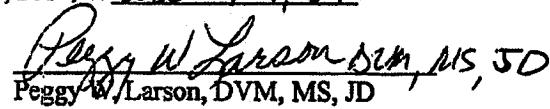
Meanwhile two more horses fell down in the alleyway. The first was the second horse in the line to the knock box. It had fallen forward and the horse behind it began to walk on top of it as the downed horse struggled to get up. The second horse to fall was the fourth horse in the line. It had flipped over backwards due to the overcrowding and was subsequently trapped and trampled by the fifth and sixth horse in the line in their excitement to move forward. Attached to this declaration are true and correct copies of the relevant USDA reports describing these incidents. In my professional opinion, this document illustrates the inhumane treatment of horses.

20. As companion animals, horses are not suited for this kind of inhumane treatment. An alternative for unwanted horses is euthanasia by a trained and licensed veterinarian. As with unwanted dogs and cats, the process of professional euthanasia quickly and painlessly ends the animal's life without the pain and suffering of long-distance transport, handling, and slaughter for human consumption. All equine veterinarians are capable of humanely euthanizing horses. I euthanized horses when I was a large animal practitioner, and it can be done in a quiet, safe and nonfrightening way. The horse does not struggle, is not fearful and dies a quiet and certain death.
21. Horses that eventually make their way to slaughter are taken to large horse auctions where they are purchased by "killer buyers." Some of these horses are healthy retired or unsuccessful race horses. Others are surplus riding school and camp horses. Many were companion animals whose owners gave them up for sale. Wild horses removed from public lands also constitute a percentage of the horses sent for human consumption, as do foals from mares whose urine is collected for the production of hormone replacement therapy drugs.
22. Many of the horses slaughtered are young and healthy, because they have been raised as companion or competitive horses, and treated with all the drugs and substances with which such animals are treated.
23. Many horses who are slaughtered for human consumption are also lame, blind, starved and/or show evidence of lack of care such as saddle sores, overgrown hooves, bad teeth, and injuries. These horses thus also show signs of having been used in the companion and competitive sectors before being sold for meat.
24. In addition, there is believed to be "a thriving trade in stolen horses going to slaughter." C.L. Stull, *Evolution of the Proposed Federal Slaughter Horse Transport Regulations*, 79 J. ANIMAL SCIENCE E12 (2001). The stolen horses presumably come from the sources identified above.
25. Transportation to a slaughter facility, especially in a multiple horse transport

vehicle, is frightening for most horses but is especially traumatic for wild horses, who resist handling during gather and transport operations. Because of their wildness, the fear they display in response to proximity to people in strange environments, and their resistance to handling and transport, wild horses experience high levels of distress and therefore the risk of injury is greater during the events leading up to slaughter.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge, and as to those matters, I believe them to be true.

Executed this 15 day of March, 2012, in Williston, VT.

  
Peggy W. Larson, DVM, MS, JD  
Peggy W. Larson, DVM, MS, JD

## **DECLARATION OF JOANNE PAVLIS**

I, Joanne Pavlis, declare as follows:

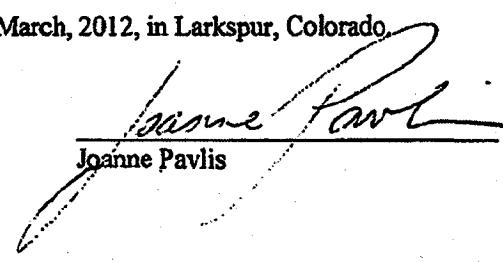
1. I am a professional horse trainer with Milemakers, LLC of Larkspur, Colorado. I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection.
2. Milemakers LLC provides training for horses and specializes in the education, training and condition of Endurance and Pleasures Distance horses and riders. We also provide conditioning for Arabian race horses who will be used on the racetrack, a beginning program for junior riders, and coaching for trail rides.
3. I have been training horses for eighteen years and have worked as a trainer with Milemakers for the last sixteen years. In the course of my work I have seen hundreds of horses, gotten to know hundreds of their owners, and am familiar with the drugs, treatments and substances used by owners of companion horses, sporting and competitive horses, and horses destined for racing.
4. I have reviewed Exhibit A to the Petition for Rulemaking being submitted by Front Range Equine Rescue. I am familiar with virtually all the drugs, treatments and substances listed on Exhibit A.
5. The drugs, treatments and substances listed on Exhibit A are all very commonly used by owners of companion horses and competition horses. Virtually all such owners would either have these drugs, treatments and substances on hand and use them on their horses, or would have access to the drugs treatments and substances, and be able to easily get them from their local veterinarian.

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"/ JP

6. I am also familiar with and have had experience with wild horses who have been captured and placed in holding pens. These horses are given some of the drugs, substances and treatments on Exhibit A, including many commonly-used veterinary drugs.

I declare under penalty of perjury that the foregoing is true and correct, based on my own personal knowledge and experience.

Executed this 19<sup>th</sup> day of March, 2012, in Larkspur, Colorado.

  
\_\_\_\_\_  
Joanne Pavlis

**BANNED AND DANGEROUS SUBSTANCES COMMONLY GIVEN TO HORSES SENT TO SLAUGHTER**

	<b>Drug</b>	<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
1.	<b>Acepromazine</b>	Anti-anxiety/tranquilizer Previously used in humans, but use discontinued	<i>See also</i> Citak A, Soysal DD, Uçsel R, Karaböyüglü M, Uzel N, <i>Seizures associated with poisoning in children: tricyclic antidepressant intoxication</i> , PEDIATR INT. 48(6):582-585 (2006) (Two children suffered cardiac arrest from intoxication from acepromazine and died.)
2.	<b>Acetazolamide</b>	Diuretic for horses.  Used to treat epilepsy and benign intracranial hypertension in children and adults.	Acetazolamide (sulfonamide) induces metabolic alkalosis and is contraindicated in patients with hyperchloremic acidosis, angle-closure glaucoma, kidney and liver disease, and in patients with Addison's disease. Fatalities have occurred (rare) due to Stevens-Johnson syndrome (diffuse rash that sloughs), toxic epidermal necrolysis, fulminant hepatic necrosis, agranulocytosis, aplastic anemia, and other blood dyscrasias. Sensitizations may recur when a sulfonamide is readministered irrespective of the route of administration. If signs of hypersensitivity or other serious reactions occur, discontinue use of this drug.  Caution is advised for patients receiving concomitant high-dose aspirin and acetazolamide, as anorexia, tachypnea, lethargy, coma and death have been reported. <a href="http://www.drugs.com/proacetazolamide.html">http://www.drugs.com/proacetazolamide.html</a>
3.	<b>Acriflavine</b>	Blue-Kote (topical ointment, antiseptic, protective wound dressing)  <a href="http://www.drugs.com/vet/dr-maylor-blu-kote.html">http://www.drugs.com/vet/dr-maylor-blu-kote.html</a>	Acriflavine is an ingredient found in Blue-Kote, which is itself labeled "not for use on animals intended for food." The dangers for humans who ingest this substance are unknown.
4.	<b>Altrenogest</b>	Regu-Mate (altrenogest/oral progestin) (growth promoter) 21 CFR § 520.48: - "Do not use in horses intended for human consumption." "Do Not Use In Horses Intended For Human Consumption." <a href="http://www.drugs.com/vet/regu-mate-solution.html">http://www.drugs.com/vet/regu-mate-solution.html</a>	Active harmful ingredients (residue): Progestin. Progestin is used in the mini-pill to prevent conception so progestin could result in an aborted fetus in a pregnant woman. Progestin along with estrogens are pro-thrombotic meaning that they cause deep blood clots, including venous thrombosis and cerebral thrombosis. <a href="http://www.ncbi.nlm.nih.gov/pmc/articles/PMC200105173442007/">http://www.ncbi.nlm.nih.gov/pmc/articles/PMC200105173442007/</a> Combined with estrogens, progestin increases the risk of breast cancer and cardiovascular problems.

Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
	<p><a href="http://www.whi.org/findings/ht/epiusp_3yr.php">http://www.whi.org/findings/ht/epiusp_3yr.php</a></p> <p>Increased stroke risk.</p> <p><a href="http://www.whi.org/findings/ht/alone_stroke.php">http://www.whi.org/findings/ht/alone_stroke.php</a></p> <p><b>HUMAN WARNINGS</b></p> <p>Skin contact must be avoided as Regu-mate® (al trenogest) Solution 0.22% is readily absorbed through unbroken skin. Protective gloves must be worn by all persons handling this product. Pregnant women or women who suspect they are pregnant should not handle Regu-mate® (al trenogest) Solution 0.22%. Women of child bearing age should exercise extreme caution when handling this product. Accidental absorption could lead to a disruption of the menstrual cycle or prolongation of pregnancy. Direct contact with the skin should therefore be avoided. Accidental spillage on the skin should be washed off immediately with soap and water.</p> <p><a href="http://www.drugs.com/vet/regu-mate-solution.html">http://www.drugs.com/vet/regu-mate-solution.html</a></p>	
5. Aluminum hydroxide	<p><b>Streptavax II (component in equine vaccine)</b></p> <p>Used in humans for gastrointestinal problems, ulcers.</p> <p><a href="http://www.drugs.com/vet/streptavaxii.html">http://www.drugs.com/vet/streptavaxii.html</a></p>	<p><b>WARNINGS/PRECAUTIONS</b></p> <p>May cause constipation. Caution with renal failure; prolonged use may result in or worsen dialysis osteomalacia. Elevated tissue aluminum levels contribute to the development of dialysis encephalopathy and osteomalacia syndromes. Caution with normophosphatemic patients; prolonged use may result in hypophosphatemia if phosphate intake is inadequate.</p> <p><b>ADVERSE REACTIONS</b></p> <p>Constipation, dialysis osteomalacia, hypophosphatemia.</p> <p><a href="http://www.ncbi.nlm.nih.gov/pubmedhealth/PMH001056/">http://www.ncbi.nlm.nih.gov/pubmedhealth/PMH001056/</a></p> <p>Can cause constipation, confusion, loss of appetite, and muscle weakness.</p> <p><a href="http://www.ncbi.nlm.nih.gov/pubmedhealth/PMH001056/">http://www.ncbi.nlm.nih.gov/pubmedhealth/PMH001056/</a></p> <p>Antibiotics are potentially dangerous to humans who either have allergies or sensitivities to them. Additionally, the use of antibiotics in food animals, and the subsequent ingestion by humans of those animals, has the potential to create antibiotic resistance in humans, which can cause significant problems for humans upon subsequent illness.</p> <p><b>Infections and Infestations: Mucocutaneous candidiasis.</b></p> <p><b>Gastrointestinal:</b> Nausea, vomiting, diarrhea, black hairy tongue, and hemorrhagic/pseudomembranous colitis. Onset of pseudomembranous colitis symptoms may occur during or after antibiotic treatment.</p> <p><b>Hypersensitivity Reactions: Anaphylaxis</b></p> <p>Serum sickness-like reactions, erythematous maculopapular rashes, erythema multiforme, Stevens-Johnson syndrome, exfoliative dermatitis, toxic epidermal necrolysis, acute generalized exanthematous pustulosis, hypersensitivity vasculitis and urticaria have been reported.</p> <p><b>Liver:</b> A moderate rise in AST (SGOT) and/or ALT (SGPT) has been noted, but the significance of this finding is unknown. Hepatic dysfunction including cholestatic</p>
6. Amikacin	<p>Antibiotic</p> <p>21 CFR § 529.56 - "Do not use in horses intended for human consumption"</p>	
7. Amoxicillin	<p>Antibiotic</p>	

Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
		<p>jaundice, hepatic cholestasis and acute cytolytic hepatitis have been reported.</p> <p><u>Hemic and Lymphatic Systems:</u> Anemia, including hemolytic anemia, thrombocytopenia, thrombocytopenic purpura, eosinophilia, leukopenia, and agranulocytosis have been reported during therapy with penicillins. These reactions are usually reversible on discontinuation of therapy and are believed to be hypersensitivity phenomena.</p> <p><u>Central Nervous System:</u> Reversible hyperactivity, agitation, anxiety, insomnia, confusion, convulsions, behavioral changes, and/or dizziness have been reported rarely.</p> <p><u>Miscellaneous:</u> Tooth discoloration (brown, yellow, or gray staining) has been rarely reported. Most reports occurred in pediatric patients. Discoloration was reduced or eliminated with brushing or dental cleaning in most cases.  <a href="http://www.drugs.com/sfx/amoxicillin-side-effects.html">http://www.drugs.com/sfx/amoxicillin-side-effects.html</a></p>
8. Ampicillin sodium	<p>Antibiotic for treatment of respiratory tract infections (pneumonia and strangles) and skin and soft tissue infections (abscesses and wounds), when caused by susceptible organisms.</p> <p>21 CFR § 522.90c</p> <ul style="list-style-type: none"> <li>- “Do not use in horses intended for human consumption.”</li> </ul>	<p><b>COMMON SIDE EFFECTS</b>  Inflammation and redness of the tongue; irritation of mouth or throat; mild diarrhea; nausea; second infection; vomiting.</p> <p><b>SEVERE SIDE EFFECTS</b>  Severe allergic reactions (rash; hives; itching; difficulty breathing; tightness in the chest; swelling of the mouth, face, lips, or tongue); bloody stools; severe diarrhea;  stomach pain/cramps; vaginal irritation or discharge.  <a href="http://www.drugs.com/sfx/ampicillin-side-effects.html">http://www.drugs.com/sfx/ampicillin-side-effects.html</a></p> <p>See also side effects for ampicillin injection:  upset stomach, diarrhea, vomiting, mild skin rash  More severe:  severe skin rash, itching, hives, difficulty breathing or swallowing, wheezing,  unusual bleeding or bruising, headache, dizziness, seizures, sore mouth or throat  <a href="http://www.nlm.nih.gov/medlineplus/druginfo/meds/a601133.html">http://www.nlm.nih.gov/medlineplus/druginfo/meds/a601133.html</a></p> <p>Material Safety Data Sheet (“MSDS”) for ampicillin sodium salt:  Toxic Effects on Humans: Hazardous in case of ingestion, of inhalation.  <a href="http://www.sciencelab.com/msds.php?msdsId=925610">http://www.sciencelab.com/msds.php?msdsId=925610</a></p>
9. Aspirin	Aspir-paste <a href="http://www.drsfostersmith.com/1/1/09/13-aspir-paste-by-oral-x.html">http://www.drsfostersmith.com/1/1/09/13-aspir-paste-by-oral-x.html</a> Reduces joint, muscle, and lameness pain.	<b>WARNINGS/PRECAUTIONS</b> Avoid in children or teenagers for chickenpox or flu symptoms; Reye's syndrome may occur. May cause severe allergic reaction (hives, facial swelling, asthma, shock) and stomach bleeding. Avoid in asthma, stomach problems that persist or recur, ulcers, or bleeding problems.

Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
		Can cause excessive bleeding in those taking warfarin; <a href="http://stroke.ahajournals.org/content/40/5/1944.full">http://stroke.ahajournals.org/content/40/5/1944.full</a>
10. <b>Avermectin A1a, 5-O-demethyl-25-de(1-methylpropyl)-22,23-dihydro-25-(1-methylethyl)-</b>	Farnam Ivercare (dewormer) <a href="http://msds.farnam.com/m001116.htm">http://msds.farnam.com/m001116.htm</a> Ivercare Paste is labeled "Do not use in horses intended for food purposes." <a href="http://www.drugs.com/vet/ivercare-paste-1-87.html">http://www.drugs.com/vet/ivercare-paste-1-87.html</a>	Severe allergic reactions (rash; hives; itching; difficulty breathing; tightness in the chest; swelling of the mouth, face, lips, or tongue); black or bloody stools; confusion; diarrhea; dizziness; drowsiness; hearing loss; ringing in the ears; severe or persistent stomach pain; unusual bruising; vomiting. <a href="http://www.drugs.com/sfx/aspirin-side-effects.html">http://www.drugs.com/sfx/aspirin-side-effects.html</a>
11. <b>Benzyl alcohol</b>	Equipoise Equipoise Injectable <a href="http://www.drugs.com/vet/equipoise-injectabe-can.html">http://www.drugs.com/vet/equipoise-injectabe-can.html</a>	A hazardous component of the Farnam Ivercare dewormer product. <a href="http://msds.farnam.com/m001116.htm">http://msds.farnam.com/m001116.htm</a> Links to the toxicological literature here: <a href="http://pubchem.ncbi.nlm.nih.gov/summary/summary.cgi?sid=14145#x50">http://pubchem.ncbi.nlm.nih.gov/summary/summary.cgi?sid=14145#x50</a> <a href="http://toxnet.nlm.nih.gov/cgi-bin/sis/search/r?dbs+toxline:@term+@term+@all+9t@OR+@all">http://toxnet.nlm.nih.gov/cgi-bin/sis/search/r?dbs+toxline:@term+@term+@all+9t@OR+@all</a>
12. <b>Boldenone undecylenate</b>	Equipoise injectable 21 CFR § 522.204 - "Do not administer to horses intended for human consumption." Equipoise injectable (boldenone undecylenate injection) is recommended as an aid for treating debilitated horses when an improvement in weight, haircut or general physical condition is desired. <a href="http://www.drugs.com/vet/equipoise-injectabe-can.html">http://www.drugs.com/vet/equipoise-injectabe-can.html</a>	ADVERSE REACTIONS Pruritis, erythema, pustuloma, ocular irritation. <a href="http://www.pdr.net/search/searchResult.aspx?searchCriteria=Benzyl+alcohol">http://www.pdr.net/search/searchResult.aspx?searchCriteria=Benzyl+alcohol</a>
13. <b>Butorphanol</b>	For the relief of pain associated with colic and postpartum pain in adult horses and yearlings.	Boldenone undecylenate is a steroid ingredient in Equipoise (for horses). It is not indicated for use in humans but appears to have off-label uses as a bodybuilding steroid. Known side effects consist of: nausea, leukopenia, symptoms resembling a peptic ulcer, acne, excitation (commonly referred to as roid rage), sleeplessness, chills, vomiting, diarrhea, hypertension, prolonged blood clotting time, increase in libido. Females had reported menstrual irregularities, post-menopausal bleeding, increased sex drive, swelling of the breasts, hoarseness or deepening of the voice, and enlargement of the clitoris. Men had reported acne, gynecomastia, and increased aggression. <a href="http://www.anabolicsmall.com/equipoise.html">http://www.anabolicsmall.com/equipoise.html</a>
		Steroids should be taken under a doctor's supervision and have multiple significant adverse affects including severe allergic reactions, hormonal changes, changes in menstrual functions, mental and mood changes, respiratory problems, nausea and vomiting, joint swelling, vision changes, and unusual weight gain.
		COMMON SIDE EFFECTS Dizziness; drowsiness; dry mouth; light-headedness; nasal irritation; nausea; runny nose; sore throat; stuffy nose; trouble sleeping; unpleasant taste; vomiting.

Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
	21 CFR § 522.246 - "Do not use in horses intended for human consumption."	<p><b>SEVERE SIDE EFFECTS</b></p> <p>Severe allergic reactions (rash; hives; itching; difficulty breathing; tightness in the chest; swelling of the mouth, face, lips, or tongue); blurred vision; burning, numbness, or tingling; change in the amount of urine produced; chest pain; confusion; ear pain; fainting; fast, slow, or irregular heartbeat; flushing; hallucinations; mental or mood changes (agitation, anxiety, depression); restlessness; ringing in the ears; seizures; severe or persistent dizziness, drowsiness, or light-headedness; severe or persistent headache or trouble sleeping; shortness of breath; slow, shallow, or difficult breathing; tremors; unusual swelling.</p> <p><a href="http://www.drugs.com/sfx/buonophanol-side-effects.html">http://www.drugs.com/sfx/buonophanol-side-effects.html</a></p>
14. <b>Butoxy Polypropylene Glycol</b>	<p>Farnam Bronco Gold (fly spray)  <a href="http://msds.farnam.com/m001650.htm">http://msds.farnam.com/m001650.htm</a></p> <p>Farnam Endure Fly Spray  <a href="http://msds.farnam.com/m000080.htm">http://msds.farnam.com/m000080.htm</a></p> <p>Farnam Endure Sweat-Resistant  <a href="http://msds.farnam.com/m001046.htm">http://msds.farnam.com/m001046.htm</a></p> <p>Farnam Tri-Tec 14  <a href="http://msds.farnam.com/m000490.htm">http://msds.farnam.com/m000490.htm</a></p> <p>Farnam Wipe (fly control)</p>	<p>In 2002, a woman in Oklahoma was hospitalized after using Pyranha fly spray on horses. Her face was distorted, and her words slurred. She reportedly had leg problems, tremors, memory problems. The medical toxicologist's conclusion was that the patient, a professional horse trainer, developed a complex neurotoxic movement disorder following sensitization to a product that contained 33% Butoxypolypropylene glycol/ BPG.</p> <p>Adverse reactions and side effects of ingestion are unknown.</p>
15. <b>Carbadox</b>	Antibiotic used for growth promotion purposes (generic)	<p>Not permitted for use in food-producing animals in Australia (<a href="http://www.apvma.gov.au/regstration/not_permitted.php">http://www.apvma.gov.au/regstration/not_permitted.php</a>)  Or in Canada, or the European Union. (<a href="http://www.hc-sc.gc.ca/dhp-mps/vet/faqs/q_mrl-lmr-eng.php#a6">http://www.hc-sc.gc.ca/dhp-mps/vet/faqs/q_mrl-lmr-eng.php#a6</a>)  Not for human use.</p> <p><a href="http://www.drugs.com/pro/mecadox.html">http://www.drugs.com/pro/mecadox.html</a></p> <p>Chronic health effects, including cancer, mutagenic effect, changes in lung function.  Accidental ingestion may cause serious harm or be fatal.</p> <p>MSDS SUPPLIER  <a href="http://datasheets.scbf.com/sc-204668.pdf">http://datasheets.scbf.com/sc-204668.pdf</a></p>
16. <b>Ceftiofur Crystalline Free Acid</b>	Excede (antibiotic) For the treatment of lower respiratory tract infections in horses.	<p>Intended for use in horses which are non-food animals. Because this indication for this new animal drug is not intended for use in food producing animals, there is no data pertaining to drug residues in food (i.e., human food safety).</p> <p><b>WARNINGS</b></p> <p>21 CFR § 522.313a</p>

		<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
		- “Do not use in horses intended for human consumption.” <a href="http://www.excede.com/Excede.aspx?country=US&amp;drug=X1&amp;sec=100&amp;species=EQ">http://www.excede.com/Excede.aspx?country=US&amp;drug=X1&amp;sec=100&amp;species=EQ</a>	Not for use in humans. For use in animals only. Consult a physician in case of accidental human exposure. Do not use in horses intended for human consumption. <a href="http://animalhealth.pfizer.com/sites/pahweb/USEN/Products/Documents/Combined%20Full%20P%20EQ%20110014.pdf">http://animalhealth.pfizer.com/sites/pahweb/USEN/Products/Documents/Combined%20Full%20P%20EQ%20110014.pdf</a>
17.	<b>Ceftiofur Sodium</b>	Ceftiflex powder For treatment of respiratory infections in horses. 21 CFR § 522.313c - “Do not use in horses intended for human consumption.” <a href="http://www.drugs.com/vet/ceftiflex.html">http://www.drugs.com/vet/ceftiflex.html</a>	Penicillins and cephalosporins can cause allergic reactions in sensitized individuals. Topical exposure to such antimicrobials, including ceftiofur, may elicit mild to severe allergic reactions in some individuals. Repeated or prolonged exposure may lead to sensitization. Avoid direct contact of the product with the skin, eyes, mouth, and clothing. <a href="http://www.drugs.com/vet/ceftiflex.html">http://www.drugs.com/vet/ceftiflex.html</a>
18.	<b>Chloramphenicol</b>	Chlor-500 Chlor-1000 Chloramphenicol 1% Ointment “Not for use in animals that are raised for food production. Must not be used in meat, egg, or milk-producing animals. 21 CFR § 520.390a; 520.390c; 522.390; 524.390. <a href="http://www.drugs.com/vet/chlor-500-can.html">http://www.drugs.com/vet/chlor-500-can.html</a> <a href="http://www.drugs.com/vet/chlor-1000-can.html">http://www.drugs.com/vet/chlor-1000-can.html</a> <a href="http://www.drugs.com/cdi/chloramphenicol.html">http://www.drugs.com/cdi/chloramphenicol.html</a>	Some medicines may interact with Chloramphenicol: •Anticoagulants (e.g., warfarin) because side effects, including risk of bleeding, may be increased. •Hydantoins (e.g., phenytoin) or sulfonylureas (e.g., glyburide) because the actions and side effects of these medicines may be increased. •Medicines that may decrease your bone marrow (e.g., cancer chemotherapy) because the risk of serious side effects, such as low blood platelet levels and low white blood cell counts, may be increased. Chloramphenicol has caused severe and sometimes fatal blood problems (e.g., anemia, low blood platelets, low white blood cell counts). Leukemia has also been reported after use of Chloramphenicol. Blood problems have occurred after both short-term and long-term use of Chloramphenicol. Do not use chloramphenicol if safer, effective medicines can be used. <a href="http://www.drugs.com/cdi/chloramphenicol.html">http://www.drugs.com/cdi/chloramphenicol.html</a>
19.	<b>Chloroform</b>	Anesthetic	Prohibited for use in food-producing animals in the European Union.
20.	<b>Clometidine</b>	Prevention and prophylaxis of	The IARC (International Agency for Research on Cancer) classifies chloroform as possibly carcinogenic to humans. <a href="http://monographs.iarc.fr/ENG/Monographs/vol73/mono73.pdf">http://monographs.iarc.fr/ENG/Monographs/vol73/mono73.pdf</a>
			<b>ADVERSE REACTIONS</b>

		<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
		gastrointestinal irritation and ulcers	Diarrhea, headache, dizziness, somnolence, reversible confusional states, reversible impotence, increased serum transaminases, rash, gynecomastia, blood dyscrasias.
			<b>WARNINGS/PRECAUTIONS</b> Reversible confusional states reported, especially in severely ill patients. Increased risk of developing confusional states with advancing age ( $\geq 50$ yrs), renal and/or hepatic impairment. Risk of hyperinfection of strongyloidiasis in immunocompromised patients. <a href="http://www.pdr.net/drugpages/concisemonograph.aspx?concise=1440">http://www.pdr.net/drugpages/concisemonograph.aspx?concise=1440</a>
21.	<b>Clenbuterol</b>	Beta-agonists used for growth promotion purposes  Prohibited from any use in any food-producing animal. <a href="http://www.farad.org/eldu/prohibit.asp">http://www.farad.org/eldu/prohibit.asp</a>	Not approved for human use. <a href="http://www.deadivision.usdoj.gov/drugs/concern/clenbuterol.htm">http://www.deadivision.usdoj.gov/drugs/concern/clenbuterol.htm</a>
22.	<b>Copper Naphthenate</b>	Kopertox  Treatment of thrush.  21 CFR § 524.463 - "Do not use in horses intended for human consumption." <a href="http://www.drugs.com/vet/kopertox.html">http://www.drugs.com/vet/kopertox.html</a> <a href="http://www.sciencelab.com/msds.php?msdsid=9923553">http://www.sciencelab.com/msds.php?msdsid=9923553</a>	Toxic to central nervous system, blood, and kidneys.  May produce vomiting, headache, shock, jaundice, kidney damage, nervous system damage, liver damage.
23.	<b>Crude Liver Extract</b>	Liver 7 injection  <a href="http://www.drugs.com/vet/liver-7-injection.html">http://www.drugs.com/vet/liver-7-injection.html</a>	FDA cautions against the use by humans of any animal organ extract. <a href="http://www.healthline.com/atsstandardcontent/liver-extract">http://www.healthline.com/atsstandardcontent/liver-extract</a>
24.	<b>Cupric Sulfate</b>	Proudsoff (ointment for control and removal of proud flesh)  Not for use on animals intended for food. <a href="http://www.drugs.com/vet/proudsoff.html">http://www.drugs.com/vet/proudsoff.html</a>	Harmful if swallowed. May cause gastrointestinal tract irritation with nausea, vomiting, diarrhea, metallic taste, burning sensation in the stomach or epigastrum, abdominal pain, and possible gastrointestinal tract bleeding. May affect metabolism, liver (liver damage, jaundice), blood, urinary system (kidney damage, hematuria, hemoglobinuria, albuminuria), behavior/nervous systems (somnolence, tremor, psychosis, muscle weakness, coma), cardiovascular system (lowering of blood pressure, dysrhythmia).
25.	<b>Cypermethrin</b>	Farnam Endure Sweat-Resistant (fly spray)  <a href="http://msds.farnam.com/m000080.htm">http://msds.farnam.com/m000080.htm</a>	*Pyrethroid ingestion gives rise within minutes to a sore throat, nausea, vomiting and abdominal pain. There may be mouth ulceration, increased secretions and/or dysphagia. Systemic effects occur 4-48 hours after exposure. Dizziness, headache and fatigue are common, and palpitations, chest tightness and blurred vision less

		<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
		m	frequent. Coma and convulsions are the principal life-threatening features. Most patients recover within 6 days." S.M. Bradberry <i>et al.</i> , <i>Poisoning Due to Pyrethrins</i> , Toxicol Rev. 24(2):93-106 (2005) (quoting abstract). Potential organ damage. <a href="http://pmep.cce.cornell.edu/profiles/extoxnet/carbaryl-diclofopos/cypermeth-ext.html">http://pmep.cce.cornell.edu/profiles/extoxnet/carbaryl-diclofopos/cypermeth-ext.html</a>
26.	Dapsone	Dermatitis skin problems in horses Acne treatment in humans.	Adverse effects include agranulocytosis, aplastic anemia, leukopenia, thrombocytopenia, hemolysis, and other blood dyscrasias have been reported after treatment. It may cause significant reduction in leukocytes, platelets, or hemopoiesis. Caution with glucose-6-phosphate dehydrogenase (G6PD) deficiency, methemoglobin reductase deficiency, or hemoglobin M, and those who are exposed to other agents or conditions such as infection or diabetic ketosis capable of producing hemolysis. Toxic hepatitis and cholestatic jaundice reported after use. Liver function tests must be monitored if there are any abnormalities. Can cause muscle weakness. Peripheral neuropathy, nausea and vomiting, abdominal pain, and pancreatitis may occur. <a href="http://www.pdr.net/search/searchResult.aspx?searchCriteria=Dapsone">http://www.pdr.net/search/searchResult.aspx?searchCriteria=Dapsone</a>
27.	Deodorized Kerosene	Component in Farnam Repel Xp (fly spray). <a href="http://msds.farnam.com/m00031.htm">http://msds.farnam.com/m00031.htm</a>	Ingestion may cause aspiration hazard, nausea, fatigue, pulmonary edema, central nervous system depression, convulsions and loss of consciousness. <a href="http://www.sciencesstuff.com/msds/CI955.html">http://www.sciencesstuff.com/msds/CI955.html</a>
28.	Deslorelin	Used for inducing ovulation within 48 hours in ovulating mares. 21 CFR § 522.533 - "Do not use in horses intended for human consumption."	Deslorelin stops the production of certain sex hormones in horses, and has never been approved for use on humans. If it was approved, it would be for a small targeted complement of the human population with identified diseases related to the production of too much of certain sex hormones, but could otherwise produce unwanted hormonal effects and responses.
29.	Detomidine Hydrochloride	Dormosedan Pain relief and sedative for minor surgery. Also used in humans for sedation in intensive care and surgery conditions.	Can cause hypotension, hypertension, bradycardia, dry mouth, respiratory depression, tachycardia, nausea and vomiting, atrial fibrillation, fever, hyperglycemia, anemia, hypovolemia, hypoxia, atelectasis. <a href="http://www.pdr.net/drugpages/concisenmonograph.aspx?concise=2848">http://www.pdr.net/drugpages/concisenmonograph.aspx?concise=2848</a>
			21 CFR § 522.536; 529.536 - Not for use in horses intended for food." - "Do not use in horses intended for human consumption." <a href="http://www.dormosedan.com/">http://www.dormosedan.com/</a>

	<b>Drug</b>	<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
30.	<b>Dexamethasone</b>	<p>Dexam injection Anti-inflammatory drug.</p> <p>21 CFR § 522.540</p> <ul style="list-style-type: none"> <li>- (d)(4) (sterile aqueous solution).</li> <li>- “Not for use in horses intended for food.”</li> <li>- (e)(5) (sterile aqueous solution).</li> <li>- “Not for use in horses intended for food.”</li> </ul> <p>21 CFR § 522.542</p> <ul style="list-style-type: none"> <li>- “Not for use in horses intended for food.”</li> </ul> <p><a href="http://www.drugs.com/vet/dexam-injection.html">http://www.drugs.com/vet/dexam-injection.html</a></p> <p>Steroid for humans.</p>	<p>Adverse reactions include fluid/electrolyte disturbances, muscle weakness, osteoporosis, peptic ulcer, pancreatitis, ulcerative esophagitis, impaired wound healing, headache, psychic disturbances, growth suppression (pediatrics), glaucoma, hyperglycemia, weight gain, nausea, malaise.</p> <p><a href="http://www.pdr.net/drugpages/concisenogram.aspx?concise=798">http://www.pdr.net/drugpages/concisenogram.aspx?concise=798</a></p> <p>Steroids should be taken under a doctor's supervision and have multiple significant adverse effects including severe allergic reactions, hormonal changes, changes in menstrual functions, mental and mood changes, respiratory problems, nausea and vomiting, joint swelling, vision changes, and unusual weight gain.</p>
31.	<b>Dichloromethane</b>	<p>Fural</p> <p>Antibacterial</p> <p><a href="http://msds.farnam.com/msd000394.htm">http://msds.farnam.com/msd000394.htm</a></p> <p>Steroid for humans.</p>	<p>If eaten, this drug can cause gastrointestinal irritation with nausea, vomiting and diarrhea. May cause kidney damage. May cause central nervous system depression, characterized by excitement, followed by headache, dizziness, drowsiness, and nausea. Advanced stages may cause collapse, unconsciousness, coma and possible death due to respiratory failure. May cause carboxyhemoglobinemia.</p> <p>Dichloromethane has been treated as a carcinogen in California since 1988 and it may also have adverse reproductive effects.</p> <p><a href="http://www.sciencelab.com/msds.php?msdsId=9948&amp;code=SLM2677">http://www.sciencelab.com/msds.php?msdsId=9948&amp;code=SLM2677</a></p>
32.	<b>Diclazuril</b>	<p>Clinacox Antiprotozoal</p> <p>Used to treat infections leading to myoencephalitis.</p> <p>21 CFR § 520.606</p> <ul style="list-style-type: none"> <li>- “Do not use in horses intended for human consumption.”</li> </ul>	<p>Administered to some AIDS patients, but effects in humans largely unknown.</p>
33.	<b>Diclofenac Sodium</b>	<p>Surpass (topical)</p> <p>Arthritis treatment in humans and horses.</p> <p>21 CFR § 524.590</p> <ul style="list-style-type: none"> <li>- “Do not use for horses intended for human consumption.”</li> </ul>	<p>May cause hypertension, edema, or heart failure. Some individuals with prior gastrointestinal disease may be hypersensitive to the drug's effects. Potential kidney failure and danger for patients with renal disease. May cause anaphylactic reactions; may harm fetus in utero. May cause liver problems. May cause anemia and affect blood. May cause abdominal pain, constipation, diarrhea, dyspepsia, flatulence, gross bleeding/perforation, heartburn, nausea and vomiting, gastrointestinal ulcers, renal function abnormalities, anemia, dizziness, edema, elevated liver enzymes.</p> <p><a href="http://www.pdr.net/search/searchResult.aspx?searchCriteria=Diclofenac+Sodium">http://www.pdr.net/search/searchResult.aspx?searchCriteria=Diclofenac+Sodium</a></p>

	<b>Drug</b>	<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
		<a href="#">topical-cream.html</a>	
34.	<b>Diffubenzuron</b>	Equitrol II Fly control <a href="http://www.drugs.com/vet/equitrol-ii-feed-thru-fly-control.html">http://www.drugs.com/vet/equitrol-ii-feed-thru-fly-control.html</a>	May cause anemia.
35.	<b>Dimethylsulfoxide</b>	<p>Topical application for sprains, soreness; may also be injected or combined with other drugs for administration.</p> <p>Limited treatment use in humans -- used as a topical application to reduce acute swelling due to trauma.</p> <p>21 CFR § 524.660a</p> <ul style="list-style-type: none"> <li>- Dimethyl sulfoxide solution</li> <li>- “Not for use in horses and dogs intended for breeding purposes nor in horses slaughtered for food.”</li> </ul> <p>21 CFR § 524.660b</p> <ul style="list-style-type: none"> <li>- Dimethyl sulfoxide gel</li> <li>- “Do not use in horses and dogs intended for breeding purposes or in horses slaughtered for food.”</li> </ul>	<p>May cause headache, dizziness, nausea, vomiting, diarrhea, constipation, breathing problems, vision problems, blood problems, and allergic reactions. Also may harm the liver and kidneys.</p> <p><a href="http://www.webmd.com/vitamins-supplements/ingredientmono-874-DMSO%20(DIMETHYLSULFOXIDE).aspx?activeingredientId=874&amp;activeIngredientName=DMSO%20(DIMETHYLSULFOXIDE)">http://www.webmd.com/vitamins-supplements/ingredientmono-874-DMSO%20(DIMETHYLSULFOXIDE).aspx?activeingredientId=874&amp;activeIngredientName=DMSO%20(DIMETHYLSULFOXIDE)</a></p> <p>MSDS available here: <a href="http://www.sciencelab.com/msds.php?msdsId=9927347">http://www.sciencelab.com/msds.php?msdsId=9927347</a></p>
36.	<b>Dimetridazole (generic)</b>	Bactericidal Antibacterial	<p>Withdrawn from European market because of dangers of gastrointestinal problems, potential for cancer.</p> <p><a href="http://www.bioagrimix.com/msds/36/36280/3628007.pdf">http://www.bioagrimix.com/msds/36/36280/3628007.pdf</a></p>
37.	<b>Di-n-propyl isocinchomeronate</b>	Fly control products:	High toxicity – classified as a carcinogenic Pesticide Action Network (PAN) “Bad Actor” <sup>1</sup>

<sup>1</sup> “PAN Bad Actor pesticides” belong to a “most toxic” set of pesticides identified by the Pesticide Action Network and Californians for Pesticide Reform (CPRA). These pesticides are at least one of the following: known or probable carcinogens, as designated by the International Agency for Research on Cancer (IARC), U.S. EPA, U.S. National Toxicology Program, and the state of California’s Proposition 65 list; reproductive or developmental toxicants, as designated by the state of

<b>Drug</b>	<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>	
	Flysect Super-7 repellent spray Flysect Super-C Mosquito Halt <a href="http://www.drugs.com/vet/flysect-super-7.html">http://www.drugs.com/vet/flysect-super-7.html</a> <a href="http://msds.farnam.com/m000811.htm">http://msds.farnam.com/m000811.htm</a> <a href="http://www.drugs.com/vet/flysect-super-c.html">http://www.drugs.com/vet/flysect-super-c.html</a> <a href="http://www.drugs.com/vet/mosquito-halt-repellent-spray-for-horses.html">http://www.drugs.com/vet/mosquito-halt-repellent-spray-for-horses.html</a>	<a href="http://www.pesticideinfo.org/Detail_Chemical.jsp?Rec_id=PC2798">www.pesticideinfo.org/Detail_Chemical.jsp?Rec_id=PC2798</a>	
38.	Dipropyli isocinchomeronate	High toxicity – PAN Bad Actor. Carcinogenic. <a href="http://www.pesticideinfo.org/Detail_Chemical.jsp?Rec_id=PC2798">www.pesticideinfo.org/Detail_Chemical.jsp?Rec_id=PC2798</a>	
39.	Domperidone	FDA has warned that this drug passes into breast milk and should not be used in nursing human mothers. Side effects include dizziness, dry mouth, nervousness, flushing, irritability, insomnia, stomach cramps, hot flashes and leg cramps, chest pain, slow/fast/irregular heartbeat, swelling of the feet or ankles, difficulty urinating, swelling of the breasts or discharge from the nipple in men or women, menstrual changes, sexual difficulties. May affect absorption and action of other drugs, and interact with other drugs. <a href="http://www.medicinenet.com/domperidone-oral/article.htm">http://www.medicinenet.com/domperidone-oral/article.htm</a>	
40.	Doxycycline	In horses, used for treatment of toxicity from fescue grass that affects pregnancies. In humans, used to increase bowel contractions and combat nausea and vomiting caused by other drugs. 21 CFR § 520.766 “Do not use in horses intended for human consumption.” <a href="http://www.fda.gov/AnimalVeterinary/SafetyInformation/ucm235691.htm">http://www.fda.gov/AnimalVeterinary/SafetyInformation/ucm235691.htm</a> Antibiotic for horses and humans. <a href="http://www.drugs.com/cdi/doxycycline-capsules.html">http://www.drugs.com/cdi/doxycycline-capsules.html</a>	Dangerous for pregnant women; may cause tooth problems, gastrointestinal symptoms, autoimmune syndrome, renal problems.

California's Proposition 65 list; neurotoxic cholinesterase inhibitors, as designated by California Department of Pesticide Regulation, the Materials Safety Data Sheet for the particular chemical, or PAN staff evaluation of chemical structure (for organophosphorus compounds); known groundwater contaminants, as designated by the state of California (for actively registered pesticides) or from historic groundwater monitoring records (for banned pesticides); pesticides with high acute toxicity, as designated by the World Health Organization (WHO), the U.S. EPA, or the U.S. National Toxicology Program.

	<b>Drug</b>	<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
41.	<b>Doxylamine succinate</b>	Antihistamine Anticholinergic 21 CFR 520.784 - "Not for use in horses intended for food."	Not to be combined with other antihistamines. Can cause multiple adverse side effects.
42.	<b>Equine Influenza vaccine</b>	Killed virus vaccine	Not intended for human use and no testing on human ingestion of this vaccine.
43.	<b>Equine Rhinopneumonitis - Influenza vaccine</b>	Killed virus vaccine Prestige II with Havlogen (vaccine) <a href="http://inervetus.nacevp.com/?m=product_view&amp;id=1047348">http://inervetus.nacevp.com/?m=product_view&amp;id=1047348</a>	Not intended for human use and no testing on human ingestion of this vaccine.
44.	<b>Estradiol</b>	Female hormone for management of reproductive functions in horses, and for relief of menopausal symptoms in humans Estradiol Cypionate in Oil Estradiol enanthate; Estradiol benzoate	Risk of cancer is among the multiple potential negative side effects related to the unapproved and uncontrolled use of this synthetic female hormone. Other side effects include headaches, dizziness, breast pain, increased risk for yeast infections, flu-like symptoms, arthritic pain, hair loss, gastrointestinal problems including nausea or vomiting, and incidences of spotting in between periods or other menstrual irregularities. May be unsafe for people with blood disorders, heart disease, obesity, seizure disorders or certain allergies.
45.	<b>Eucalyptus Oil</b>	Scarlet Oil Wound Dressing <a href="http://www.drugs.com/vet/scarlet-oil.html">http://www.drugs.com/vet/scarlet-oil.html</a>	Potential side effects include seizures, poisoning, drowsiness, morbidity in children, central nervous system, depression.
46.	<b>Fenbendazole</b>	Labeled "Not for use on animals intended for food."	No human formulation, and adverse effects on humans who eat this dewormer, that directly affects the gastrointestinal tract, are unknown.
		Dewormer (Panacur) Equi-bits Panacur Paste Panacur Power Pac Panacur Suspension Safe-Guard Safe-Guard Power-Dose 21 CFR § 520.905a - "Do not use in horses intended	

	<b>Drug</b>	<b>Product/Type/Warnings for human consumption."</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
47.	<b>Firocoxib</b>	<p>Equioxx</p> <p>Non-steroidal anti-inflammatory drug (NSAID).</p> <p>21 CFR § 520.930; 522.930</p> <ul style="list-style-type: none"> <li>- Firocoxib paste.</li> <li>- “Do not use in horses intended for human consumption.”</li> </ul> <p><a href="http://www.equioxx.com/">http://www.equioxx.com/</a></p>	<p>There is no approved use of this drug for humans and so any adverse effects on humans who ingest this drug are completely unknown.</p> <p>Firocoxib is one of the NSAIDs, all of which have extensive potential adverse side effects in humans including cardiovascular, gastrointestinal, kidney and eye problems. The NSAIDs can be dangerous for individuals with blood disorders. They are also contraindicated during pregnancy. They also present significant risk for people with a history of ulcers or gastrointestinal bleeding. Can cause nausea, abdominal pain, diarrhea, headaches, excitability, and nervous system problems.</p>
48.	<b>Flunixin</b>	<p>NSAID:</p> <p>Banamine (solution or paste) (pain killer)</p> <p>Flunazine injectable</p> <p>Flu-nix D injection</p> <p>Flunixamine</p> <p>21 CFR § 520.970</p> <ul style="list-style-type: none"> <li>- Granules</li> <li>- “Do not use in horses intended for human consumption.”</li> </ul> <p>21 CFR § 522.970</p> <ul style="list-style-type: none"> <li>- Injectable</li> <li>- “Do not use in horses intended for human consumption.”</li> </ul>	<p>Flunixin is one of the NSAIDs, all of which have extensive potential adverse side effects in humans including cardiovascular, gastrointestinal, kidney and eye problems. The NSAIDs can be dangerous for individuals with blood disorders. They are also contraindicated during pregnancy. They also present significant risk for people with a history of ulcers or gastrointestinal bleeding. Can cause nausea, abdominal pain, diarrhea, headaches, excitability, and nervous system problems.</p>
49.	<b>Flunixin Meglumine</b>	<p>NSAID:</p> <p>Flunazine injectable</p> <p>Flu-nix D injection</p> <p>Flunixamine</p> <p>Labeled: Not for use in horses intended for food.</p> <p><a href="http://www.drugs.com/vet/flunixin-meglumine-injection.html">http://www.drugs.com/vet/flunixin-meglumine-injection.html</a></p> <p><a href="http://www.drugs.com/vet/flu-nix-d-injectablesolution.html">http://www.drugs.com/vet/flu-nix-d-injectablesolution.html</a></p> <p><a href="http://www.drugs.com/vet/flu-nix-d.html">http://www.drugs.com/vet/flu-nix-d.html</a></p>	<p>This is also one of the NSAIDs, all of which have extensive potential adverse side effects in humans including cardiovascular, gastrointestinal, kidney and eye problems. The NSAIDs can be dangerous for individuals with blood disorders. They are also contraindicated during pregnancy. They also present significant risk for people with a history of ulcers or gastrointestinal bleeding. Can cause nausea, abdominal pain, diarrhea, headaches, excitability, and nervous system problems.</p>

	<b>Drug</b>	<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
		ivx.html <a href="http://www.drugs.com/vet/funixami-ne.html">http://www.drugs.com/vet/funixami-ne.html</a>	
50.	<b>Furaltadone</b>	<b>Antibacterial</b> <a href="http://www.chemblink.com/MSDS/MSDSFiles/132-91-3_Sigma-Aldrich.pdf">http://www.chemblink.com/MSDS/MSDSFiles/132-91-3_Sigma-Aldrich.pdf</a>	May cause cancer in humans, but very little known about effect on humans because the drug has not been tested on humans and the potential side effects upon ingestion are unknown.
51.	<b>Furazolidone</b>	<b>Antibacterial:</b> Fural Furox Aerosol Powder Used in humans as an anti-diarrheal 21 CFR § 524.1005 - "Not for use in horses intended for food."  <a href="http://msds.farnam.com/m00394.htm">http://msds.farnam.com/m00394.htm</a> <a href="http://www.drugs.com/vet/furazolidone-aerosol-powder.html">http://www.drugs.com/vet/furazolidone-aerosol-powder.html</a>	Contains chemicals known to the state of California to cause cancer.  Should only be taken under strict medical oversight; dangerous if taken with alcohol, when pregnant, or for individuals with certain blood disorders.  Adverse effects include headache, stomach upset, nausea, vomiting, dizziness or weakness, fever, skin rash, itching, muscle aches, flushing, breathing trouble. This medication may cause the urine to turn brown in color.
52.	<b>Furosemide</b>	<b>Diuretic:</b> Lasix Used in humans and horses	May cause pancreatitis, jaundice, anorexia, paresthesias, ototoxicity, blood dyscrasias, dizziness, rash, urticaria, photosensitivity, fever, thrombophlebitis, restlessness. <a href="http://www.pdr.net/search/searchResult.aspx?searchCriteria=Furosemide">http://www.pdr.net/search/searchResult.aspx?searchCriteria=Furosemide</a>
53.	<b>Gentamicin sulfate solution</b>	<b>Antibiotic:</b> Gentamicin solution Do not use for horses intended for human consumption.  <a href="http://www.drugs.com/vet/gentamicin-sulfate-solution.html">http://www.drugs.com/vet/gentamicin-sulfate-solution.html</a> 21 CFR § 529.104(a) - "Do not use in horses intended for human consumption."	Can cause severe hearing and kidney problems. May cause dizziness, vertigo, ringing in the ears, hearing loss, numbness, muscle twitching or weakness, difficulty breathing, decreased urination, rash, itching, or sore throat. Interaction and potential harm with other drugs can cause adverse reactions.
54.	<b>Gentian violet</b>	Blue-Kote	Usually used topically on humans. Unknown side effects upon ingestion.

Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
55. HCl	<p>Topical ointment, antiseptic, protective wound dressing.</p> <p>Not for use on food producing animals.</p> <p><a href="http://www.drugs.com/vet/dr-naylor-blk-kote.html">http://www.drugs.com/vet/dr-naylor-blk-kote.html</a></p> <p><a href="http://www.drnaylor.com/index.php?option=com_content&amp;task=blogcategory&amp;id=20&amp;Itemid=47">http://www.drnaylor.com/index.php?option=com_content&amp;task=blogcategory&amp;id=20&amp;Itemid=47</a></p> <p>“Not for use on animals intended for food.”</p> <p><a href="http://www.horsesuppliesplus.com/antiseptics.html">http://www.horseuppliesplus.com/antiseptics.html</a></p>	<p>Very hazardous if touched; not fully tested on humans; may be fatal if inhaled or swallowed. Causes irritation and burning, ulceration, or perforation of the gastrointestinal tract and resultant peritonitis, gastric hemorrhage and infection. Can also cause nausea, vomiting (with “coffee ground” emesis), diarrhea, thirst, difficulty swallowing, salivation, chills, fever, uneasiness, shock, strictures and stenosis (esophageal, gastric, pyloric). May affect behavior (excitement), the cardiovascular system (weak rapid pulse, tachycardia), respiration (shallow respiration), and urinary system (kidneys- renal failure, nephritis). Acute exposure via inhalation or ingestion can also cause erosion of tooth enamel.</p>
56. Hyaluronate sodium	<p>Component of Dexium injection</p> <p><a href="http://www.drugs.com/vet/dexium-injection.html">http://www.drugs.com/vet/dexium-injection.html</a></p>	<p>May cause gastrointestinal tract inflammation with nausea and vomiting. It may affect blood (normocytic anemia, change in leukocyte count), metabolism, behavior (ataxia, convulsions), respiration (respiratory stimulation), and urinary system. The toxicological properties of this substance have not been fully investigated.</p> <p><a href="http://www.msds.com/msds.php?msdsId=9924276">http://www.msds.com/msds.php?msdsId=9924276</a></p>
57. Hyaluronic acid sodium salt	<p>Arthritis treatment</p> <p>Legend</p> <p>Legend injectable</p> <p>21 CFR § 522.1145</p> <ul style="list-style-type: none"> <li>- “Do not use in horses intended for human consumption.”</li> <li>- “Not for use in horses intended for food.”</li> </ul> <p><a href="http://www.bayerdvm.com/products/legend/legend.cfm">http://www.bayerdvm.com/products/legend/legend.cfm</a></p> <p><a href="http://www.drugs.com/vet/legend-multi-dose-hyaluronate-sodium-injectable-solution.html">http://www.drugs.com/vet/legend-multi-dose-hyaluronate-sodium-injectable-solution.html</a></p>	<p>May cause gastrointestinal irritation, affect blood, metabolism and behavior. The dangers upon ingestion by humans has not been fully investigated.</p>

	<b>Drug</b>	<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
		For use only as a surgical lavage in animals not intended for food use. <a href="http://www.medi-vet.com/Polyglycan.aspx">http://www.medi-vet.com/Polyglycan.aspx</a>	
58.	<b>Hydroxyzine Pamoate</b>	Anti-anxiety in humans and preoperative sedation. Antihistamine, anti-itching and sedative in animals. <a href="http://www.drsfostersmith.com/product/display.cfm?pcatid=20678">http://www.drsfostersmith.com/product/display.cfm?pcatid=20678</a>	May impair mental and physical abilities in elderly, may potentiate other medications, and not for use by pregnant or nursing mothers. <a href="http://www.pdr.net/drugpages/concisemonograph.aspx?concise=1096">http://www.pdr.net/drugpages/concisemonograph.aspx?concise=1096</a>
59.	<b>Hyoscine butylbromide</b>	Buscopan Scopolamine Antispasmodic; colic pain relief. <a href="http://www.drugs.com/vet/buscopan-sterile-solution-can.html">http://www.drugs.com/vet/buscopan-sterile-solution-can.html</a>	Potential adverse effects include blurred vision, severe allergic reactions, confusion, urinary problems, and mood changes. <a href="http://www.drugs.com/skf/scopolamine-side-effects.html">www.drugs.com/skf/scopolamine-side-effects.html</a>
60.	<b>Isoflurane</b>	Surgical anesthetic 21 CFR § 529.1186 - "Do not use in horses intended for human consumption."	MSDS reports no information on toxicity upon ingestion.
61.	<b>Isoparaffinic Petroleum Solvent</b>	Fly Control: Farnam Bronco Gold (spray) Farnam Wipe <a href="http://msds.farnam.com/m001650.htm">http://msds.farnam.com/m001650.htm</a> <a href="http://msds.farnam.com/m00490.htm">http://msds.farnam.com/m00490.htm</a>	Unknown human toxicity and side effects after ingestion.
62.	<b>Ivermectin</b>	Dewormers: Agri-mectin Paste Bimectin Paste Equil Paste	Can act for up to twelve months; carcinogenicity not studied; not recommended for pregnant women; distributes into breast milk. Adverse reactions include prurius, edema, papular/pustular/frank urticarial rash, fever, axillary/cervical/inguinal lymphadenopathy, arthralgia/synovitis, limbitis, tachycardia, peripheral edema, leukopenia, eosinophilia

Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites <a href="http://www.pdr.net/search/searchResult.aspx?searchCriteria=ivermectin">http://www.pdr.net/search/searchResult.aspx?searchCriteria=ivermectin</a>
	<p><b>Equimax</b></p> <p>Farnam Ivercare</p> <p>Horse Health Ivermectin</p> <p>Ivercare paste</p> <p>ProMectin E™ Paste</p> <p>Zimecterin Gold</p> <p>Zimecterin Paste</p> <p>Also found in human anthelmintic compounds</p> <p>21 CFR § 520.1192</p> <ul style="list-style-type: none"> <li>- Paste</li> <li>- “Do not use in horses intended for human consumption.”</li> </ul> <p>21 CFR § 1194</p> <ul style="list-style-type: none"> <li>- Meal</li> <li>- “Do not use in horses intended for human consumption.”</li> </ul> <p>21 CFR § 1195</p> <ul style="list-style-type: none"> <li>- Liquid</li> <li>- “Do not use in horses intended for human consumption.”</li> </ul> <p>21 CFR § 1198</p> <ul style="list-style-type: none"> <li>- Ivermectin and praziquantel paste</li> <li>- “Do not use in horses intended for human consumption.”</li> </ul> <p><a href="http://www.drugs.com/vet/agri-mectin-paste-1-87.html">http://www.drugs.com/vet/agri-mectin-paste-1-87.html</a></p> <p><a href="http://www.drugs.com/vet/agri-mectin-paste-1-87.html">http://www.drugs.com/vet/agri-mectin-paste-1-87.html</a></p> <p><a href="http://www.davisandlawrence.com/1-x-6-08-g.html">http://www.davisandlawrence.com/1-x-6-08-g.html</a></p> <p><a href="http://www.horsehealthusa.com/details/Equil-Paste/37-105.html">http://www.horsehealthusa.com/details/Equil-Paste/37-105.html</a></p> <p><a href="http://www.equinamaxhorse.com/">http://www.equinamaxhorse.com/</a></p>	

	<b>Drug</b>	<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
63.	<b>Ketoprofen</b>	<p>NSAID: Ketofen</p> <p>Used as NSAID in horses and humans.</p> <p>21 CFR § 522.1225</p> <ul style="list-style-type: none"> <li>- “Not for use in horses intended for food.”</li> </ul> <p><a href="http://www.drugs.com/vet/ketofen.html">http://www.drugs.com/vet/ketofen.html</a></p>	<p>Ketoprofen is one of the NSAIDs, all of which have extensive potential adverse side effects in humans including cardiovascular, gastrointestinal, kidney and eye problems. The NSAIDs can be dangerous for individuals with blood disorders. They are also contraindicated during pregnancy. They also present significant risk for people with a history of ulcers or gastrointestinal bleeding. Can cause nausea, abdominal pain, diarrhea, headaches, excitability, and nervous system problems.</p>
64.	<b>Levothyroxine Sodium</b>	<p>Thyro-L</p> <p>Thyroid replacement hormone.</p> <p><a href="http://www.drugs.com/vet/thyro-l.html">http://www.drugs.com/vet/thyro-l.html</a></p>	<p>This artificial thyroid hormone can exacerbate thyroid and hypertension problems in susceptible individuals.</p> <p><a href="http://www.pdr.net/search/searchResult.aspx?searchCriteria=Levothyroxine+Sodium">http://www.pdr.net/search/searchResult.aspx?searchCriteria=Levothyroxine+Sodium</a></p>
65.	<b>Luprostrol</b>	<p>For control of reproductive cycles and inducing termination of pregnancy.</p> <p>21 USC § 522.1290</p> <ul style="list-style-type: none"> <li>- solution</li> <li>- “Do not use in horses intended for human consumption.”</li> <li>- “Labeling shall bear the following statements: Warning: Women of child-bearing age, asthmatics, and persons with bronchial and other respiratory problems should exercise extreme caution when handling this product. In the early stages, women may be unaware of their pregnancies...”</li> </ul>	<p>Dangerous for children, pregnant and lactating mothers, individuals with respiratory problems. Can cause hormonal effects when taken.</p>
66.	<b>Mepivacaine</b>	<p>Anesthetic</p> <p>21 CFR § 522.1372</p> <ul style="list-style-type: none"> <li>- “Not for use in horses intended for human consumption.”</li> </ul>	<p>Because this is an injectable drug, studies have not been done on the dangers of ingestion.</p>
67.	<b>Methocarbamol</b>	<p>Robaxin</p> <p>Muscle relaxant in animals and humans.</p>	<p>Potential adverse reactions include lightheadedness, dizziness, drowsiness, nausea, urticaria, pruritis, rash, conjunctivitis, nasal congestion, blurred vision, headache, fever, seizures, syncope, flushing.</p> <p><a href="http://www.pdr.net/search/searchResult.aspx?searchCriteria=Methocarbamol">http://www.pdr.net/search/searchResult.aspx?searchCriteria=Methocarbamol</a></p>

		<b>Drug</b>	<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
			<a href="http://www.petplace.com/drug-library/methocarbamol-toanaxin-v/page1.aspx">http://www.petplace.com/drug-library/methocarbamol-toanaxin-v/page1.aspx</a>	
68.	<b>Methyl Salicylate</b>	Scarlet Oil Wound dressing for horses. Muscle and joint pain relief in humans. Not for use on animals intended for food.	<p>"When ingested, the highly concentrated liquid methyl salicylate in the form of wintergreen oil, as with other volatile oils, can induce vomiting and is a notorious source for severe, often fatal poisonings."</p> <p><a href="http://www.drugs.com/npp/wintergreen.html">http://www.drugs.com/npp/wintergreen.html</a></p> <p>Dangerous if used in conjunction with other analgesics, anticoagulants, steroids, NSAIDs, alcohol, and diuretics.</p> <p><a href="http://www.pdr.net/search/searchResult.aspx?searchCriteria=Methyl+Salicylate">http://www.pdr.net/search/searchResult.aspx?searchCriteria=Methyl+Salicylate</a></p>	
69.	<b>Methylandrostenediol</b>	Methandroiol Anabolic steroid Used as growth stimulator and steroid in horses and humans.	<p>Can cause estrogenic (female hormone) and androgenic (male hormone) effects.</p> <p>Steroids should be taken under a doctor's supervision and have multiple significant adverse affects including severe allergic reactions, hormonal changes, changes in menstrual functions, mental and mood changes, respiratory problems, nausea and vomiting, joint swelling, vision changes, and unusual weight gain.</p>	
70.	<b>Methylprednisolone</b>	Human and horse steroid 21 CFR § 522.1410 - "Do not use in horses intended for human consumption."	<p>Steroids should be taken under a doctor's supervision and have multiple significant adverse affects including severe allergic reactions, hormonal changes, changes in menstrual functions, mental and mood changes, respiratory problems, nausea and vomiting, joint swelling, vision changes, and unusual weight gain.</p>	
71.	<b>Metronidazole</b>	Antibiotic in humans and horses (Flagyl)	<p>This drug can cause gastrointestinal problems, serious allergic reactions in sensitive individuals, flu-like symptoms, seizures, encephalopathy, aseptic meningitis, peripheral neuropathy, nausea and vomiting, headache, anorexia and neutropenia.</p> <p><a href="http://www.wedgewoodpetrx.com/learning-center/professional-monographs/metronidazole-for-veterinary-use-ab.html">http://www.wedgewoodpetrx.com/learning-center/professional-monographs/metronidazole-for-veterinary-use-ab.html</a></p>	
72.	<b>Moxidectin</b>	Quest Gel Quest Plus	<p>Very limited testing on humans – potential adverse effects still unknown.</p> <p>Antiparasitic (dewormers) Not for horses or ponies intended for human consumption.</p> <p><a href="http://www.fda.gov/AnimalVeterinary/GuidanceComplianceEnforcement/">http://www.fda.gov/AnimalVeterinary/GuidanceComplianceEnforcement/</a></p>	

	<b>Drug</b>	<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
		<u>Compliance Enforcement/ucm168782.htm</u> 21 CFR § 520.1452; 520.1463 - Gel - “Not for use in horses and ponies intended for food.” <a href="http://www.drugs.com/vet/quest-plus-equine-oral-gel.html">http://www.drugs.com/vet/quest-plus-equine-oral-gel.html</a>	
73.	<b>N-(2-Ethylhexyl)-5-norbornene-2,3-dicarboximide</b>	Bug Block (fly control) <a href="http://absorbine.org/products/flycontrol/bug-block-insecticide-repellent.pdf">http://absorbine.org/products/flycontrol/bug-block-insecticide-repellent.pdf</a> <a href="http://www.stateinetack.com/ContentFiles/Associated_Content/absorbine_bugblockMSDS.pdf">http://www.stateinetack.com/ContentFiles/Associated_Content/absorbine_bugblockMSDS.pdf</a>	“Harmful if ingested.” Bug Block fly control has multiple adverse effects if swallowed by humans. <a href="http://www.stateinetack.com/ContentFiles/Associated_Content/absorbine_bugblockMSDS.pdf">http://www.stateinetack.com/ContentFiles/Associated_Content/absorbine_bugblockMSDS.pdf</a>
74.	<b>N-acetyl-D-glucosamine 10%</b>	Polyglycan Post-surgical lavage of joint compartments. “Do not administer to animals that are to be slaughtered for food.” <a href="http://www.artrodynamic.com/polyglycan/">http://www.artrodynamic.com/polyglycan/</a>	Ingredient in Polyglycan, which includes warning: “For use only as a surgical lavage in animals not intended for food use.” <a href="http://www.medi-vet.com/Polyglycan.aspx">http://www.medi-vet.com/Polyglycan.aspx</a>
75.	<b>Neomycin Sulfate</b>	Animax ointment Human and animal antimicrobial, anti-fungal steroid drug	May cause nausea and vomiting, diarrhea, malabsorption syndrome, nephrotoxicity, ototoxicity, neuromuscular blockade, neurotoxicity, fetal harm. Especially dangerous for individuals with certain diseases of the muscles. <a href="http://www.pdr.net/drugpages/concisemonograph.aspx?concise=3174">http://www.pdr.net/drugpages/concisemonograph.aspx?concise=3174</a>
76.	<b>Nitrofurantoin</b>	Equisulfur Antibacterial for urinary tract infections in horses and humans. This drug is not to be administered to horses that are to be slaughtered for use in food. <a href="http://www.drugs.com/vet/equisulfur-can.html">http://www.drugs.com/vet/equisulfur-can.html</a>	Adverse effects include hypersensitivity reactions, pulmonary/hepatic/psychotic reactions, peripheral neuropathy, nausea and vomiting, anorexia, dizziness, exfoliative dermatitis, anaphylaxis, hematologic abnormalities, cyanosis, angioedema, asthenia. <a href="http://www.pdr.net/drugpages/concisemonograph.aspx?concise=383">http://www.pdr.net/drugpages/concisemonograph.aspx?concise=383</a>

	<b>Drug</b>	<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
77.	<b>Nitrofurazone</b>	Niderm Ointment Antibacterial ointment, burns, skin grafts.  21 CFR § 524.1580b - “Do not use in horses intended for human consumption.” - “Federal law prohibits the use of this product in food-producing animals.”  Federal law prohibits the administration of this preparation to animals that produce food or that are intended for consumption as food. <a href="http://www.drugs.com/vet/niderm-ointment-can.html">http://www.drugs.com/vet/niderm-ointment-can.html</a>	Very toxic to humans.  <a href="http://www.scienceelab.com/msds.php?msdsId=9926271">http://www.scienceelab.com/msds.php?msdsId=9926271</a>
78.	<b>N-Octyl Bicycloheptene Dicarboximide</b>	Farnam Roll-On Repellent Fly spray <a href="http://msds.farnam.com/m000018.htm">http://msds.farnam.com/m000018.htm</a>	According to the manufacturer, Farnam Roll-On Repellent is “harmful if swallowed.”
79.	<b>Nystatin</b>	Antimicrobial, antifungal and steroid Animax ointment Mycostatin Bio-Statin  For use in humans and horses with thrush.	Adverse reactions include oral irritation, sensitization, diarrhea, nausea and vomiting, gastrointestinal disturbances, rash, urticaria, Stevens-Johnson syndrome.  <a href="http://www.pdr.net/search/searchResult.aspx?searchCriteria=Nystatin">http://www.pdr.net/search/searchResult.aspx?searchCriteria=Nystatin</a>  See also: <a href="http://www.ncbi.nlm.nih.gov/pubmedhealth/PMH0000767/">http://www.ncbi.nlm.nih.gov/pubmedhealth/PMH0000767/</a> <a href="http://www.nlm.nih.gov/medlineplus/druginfo/meds/a682758.html">http://www.nlm.nih.gov/medlineplus/druginfo/meds/a682758.html</a>
80.	<b>Omeprazole</b>	Treatment for ulcers in horses and humans. Gastrogard  21 CFR § 520.1615 - “Do not use in horses intended for human consumption.” <a href="http://gastrogard.us.merial.com/faq.shtml">http://gastrogard.us.merial.com/faq.shtml</a>	Adverse reactions include headache, diarrhea, abdominal pain, nausea and vomiting, fever, respiratory disorders, severe allergic reactions, irregular heartbeat, bruising and bleeding.  <a href="http://www.pdr.net/search/searchResult.aspx?searchCriteria=Omeprazole">http://www.pdr.net/search/searchResult.aspx?searchCriteria=Omeprazole</a>
81.	<b>Oxibendazole</b>	Anthelmicide dewormer	“Do not allow product to enter drinking water supplies, waste water or soil.”

		<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
		21 CFR § 520.1638 - paste - "Not for use in horses intended for human consumption."  21 CFR § 520.1638 - Suspension - "Not for use in horses intended for human consumption." Not for use in horses intended for human consumption.  <a href="http://www.drugs.com/vet/anthelcide-eq-equine-wormer-paste.html">http://www.drugs.com/vet/anthelcide-eq-equine-wormer-paste.html</a>	<a href="http://www.seqchem.com/safetysheet.php?SQIndex=SKP0124910">http://www.seqchem.com/safetysheet.php?SQIndex=SKP0124910</a>
82.	<b>Parachlorometaxylenol</b>	Scarlet Oil  Not for use on animals intended for food.  <a href="http://www.drugs.com/vet/scarlet-oil.html">http://www.drugs.com/vet/scarlet-oil.html</a>	May cause burning of mouth, throat and stomach, if ingested.  <a href="http://surfactantsinc.com/pdf/Suicide%20PCM-X-USP%20MSDS.pdf">http://surfactantsinc.com/pdf/Suicide%20PCM-X-USP%20MSDS.pdf</a>
83.	<b>Phenol</b>	Red-Kote  Not for use on animals intended for food.  <a href="http://www.drugs.com/vet/dr-naylor-red-kote.html">http://www.drugs.com/vet/dr-naylor-red-kote.html</a>	Phenol is considered to be quite toxic to humans via oral exposure. Anorexia, progressive weight loss, diarrhea, vertigo, salivation, a dark coloration of the urine, and blood and liver effects have been reported in chronically (long-term) exposed humans. Animal studies have reported reduced fetal body weights, growth retardation, and abnormal development in the offspring of animals exposed to phenol by the oral route.  <a href="http://www.epa.gov/tw/rhlfes/phenol.html">http://www.epa.gov/tw/rhlfes/phenol.html</a>
84.	<b>Phenylbutazone</b>	NSAID:  Butazone 400 Butazone 1000 Butazone Concentrate Bute paste Butequine  21 USC §520.1770a - Tablets and boluses - Dogs and horses - "Do not use in horses intended for human consumption.."  21 USC § 522.1720	Serious and fatal adverse effects have been reported from ingestion of Phenylbutazone, including bone marrow suppression and aplastic anemia. Banned in America for human use. Nicholas Dodman, Nicolas Blondell, Ann M. Marin, "Association of phenylbutazone usage with horses bought for slaughter: A public health risk", FOOD AND CHEMICAL TOXICOLOGY 48 (2010) 1270–74.  "Phenylbutazone is known to induce blood dyscrasias, including aplastic anemia, leukopenia, agranulocytosis, thrombocytopenia and deaths. Hypersensitivity reactions of the serum-sickness type have also been reported. In addition, phenylbutazone is a carcinogen, as determined by the National Toxicology Program.  <a href="http://www.fda.gov/AnimalVeterinary/NewsEvents/UCMUpdates/ucm124078.htm">http://www.fda.gov/AnimalVeterinary/NewsEvents/UCMUpdates/ucm124078.htm</a>  Phenylbutazone is especially problematic for patients with a history of asthma attacks, hives, or other allergic reactions to aspirin or other NSAIDs. It also should be avoided by patients with peptic ulcer disease or poor kidney function, since this medication

Drug	Product/Type/Warnings	Potential problems from human ingestion of residue or metabolites
	<p>Injection</p> <ul style="list-style-type: none"> <li>- Dogs and horses</li> <li>- "Not for use in animals intended for food."</li> </ul> <p><a href="http://horsebackmagazine.com/hb/article/13184">http://horsebackmagazine.com/hb/article/13184</a></p> <p><a href="http://www.farnavet.com/pc-1500-163-bute-paste-12-gm.aspx">http://www.farnavet.com/pc-1500-163-bute-paste-12-gm.aspx</a></p> <p><a href="http://www.drugs.com/vet/butequine-can.html">http://www.drugs.com/vet/butequine-can.html</a></p> <p><a href="http://tuesdayhorse.wordpress.com/tag/cfia/">http://tuesdayhorse.wordpress.com/tag/cfia/</a></p>	<p>can aggravate both conditions. Phenylbutazone is generally used with caution in patients taking blood thinning medications (anticoagulants), such as warfarin (Coumadin), because of an increased risk of bleeding. Patients taking lithium can develop toxic blood lithium levels. Additionally, patients taking cyclosporine (Sandimmune) can develop kidney toxicity.</p>
85.	<p><b>Piperonyl Butoxide</b></p> <p>Repel-XP Fly control</p> <p>Do not use on horses intended for human consumption.</p> <p><a href="http://www.drugs.com/vet/repel-xp-emulsifiable-fly-spray.html">http://www.drugs.com/vet/repel-xp-emulsifiable-fly-spray.html</a></p>	<p>Potential dangers to humans are unknown: "Data are not available from accidental poisonings, occupational exposures, or epidemiological studies regarding the reproductive and developmental toxicity of piperonyl butoxide." <a href="http://nic.orst.edu/factsheets/pbotech.pdf">http://nic.orst.edu/factsheets/pbotech.pdf</a></p> <p>Ingestion can cause vomiting and diarrhea. Pesticide Action Network North America. Piperonyl Butoxide. <a href="http://www.pesticideinfo.org/Detail_Chemical.jsp?Rec_Id=PC33240">http://www.pesticideinfo.org/Detail_Chemical.jsp?Rec_Id=PC33240</a></p> <p>The EPA classifies piperonyl butoxide as a group C carcinogen, a possible human carcinogen. Environmental Protection Agency. Registration Eligibility Decision for Piperonyl Butoxide. (June 2006). <a href="http://www.epa.gov/oppd001/reregistration/REDs/piperonyl_red.pdf">http://www.epa.gov/oppd001/reregistration/REDs/piperonyl_red.pdf</a></p> <p>Data on human safety, pertaining to consumption of drug residues in food, were not required for approval of this supplemental new animal drug. The drug is approved for use only in horses that are not to be used for food and is to be labeled "Not for use in horses intended for food."</p> <p><a href="http://www.fda.gov/AnimalVeterinary/Products/ApprovedAnimalDrugsProducts/FOA/DrugSummaries/ucm054846.htm">http://www.fda.gov/AnimalVeterinary/Products/ApprovedAnimalDrugsProducts/FOA/DrugSummaries/ucm054846.htm</a></p>
86.	<p><b>Polysulfated Glycosaminoglycan</b></p> <p>Adequan</p> <p>Joint treatment.</p> <p>21 USC § 522.1850</p> <ul style="list-style-type: none"> <li>- "Do not use in horses intended for human consumption."</li> </ul>	<p>Data on human safety, pertaining to consumption of drug residues in food, were not required for approval of this supplemental new animal drug. The drug is approved for use only in horses that are not to be used for food and is to be labeled "Not for use in horses intended for food."</p> <p>Based on the formulation of the drug, humans could develop anaphylaxis or excessive bleeding as the sulfated proteoglycans are anticoagulants.</p>
87.	<p><b>Ponazuril</b></p>	<p>Unknown side effects and adverse reactions in humans ingesting Ponazuril.</p> <p>"Data on human safety, pertaining to consumption of drug residues in food, were not required for approval of this supplemental new animal drug. The drug is approved for use only in horses that are not to be used for food and is to be labeled 'Not for use in horses intended for food.'"</p> <p>Freedom of Information Summary, Original New Animal Drug Application, NADA</p>

		<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
		"Not for use in horses intended for food."  <a href="http://www.drugs.com/vet/marquis-15-w-w-ponazuri-antiprotozoal-oral-paste.html">http://www.drugs.com/vet/marquis-15-w-w-ponazuri-antiprotozoal-oral-paste.html</a>	141-188 (Marquis), <a href="http://www.fda.gov/downloads/AnimalVeterinary/.../ucm117581.pdf">www.fda.gov/downloads/AnimalVeterinary/.../ucm117581.pdf</a>
88.	<b>Prallethrin</b>	Insecticide Mosquito Halt Fly spray <a href="http://www.drugs.com/vet/mosquito-halt-repellent-spray-for-horses.html">http://www.drugs.com/vet/mosquito-halt-repellent-spray-for-horses.html</a>	Potential poisoning, headache, dizziness, nausea, and seizure.  <a href="http://www.pesticideinfo.org/Detail_Chemical.jsp?Rec_Id=PC35755">http://www.pesticideinfo.org/Detail_Chemical.jsp?Rec_Id=PC35755</a> "Pyrethroid ingestion gives rise within minutes to a sore throat, nausea, vomiting and abdominal pain. There may be mouth ulceration, increased secretions and/or dysphagia. Systemic effects occur 4-48 hours after exposure. Dizziness, headache and fatigue are common, and palpitations, chest tightness and blurred vision less frequent. Coma and convulsions are the principal life-threatening features. Most patients recover within 6 days." S.M. Bradberry <i>et al.</i> , <i>Poisoning Due to Pyrethroids</i> , Toxicol Rev. 24(2):93-106 (2005) (quoting abstract).
89.	<b>Praziquantel</b>	Dewormer  For horses and humans Equimax Quest Plus Zimecterin Gold <a href="http://www.equitamaxhorse.com/">http://www.equitamaxhorse.com/</a> <a href="http://www.drugs.com/vet/quest-plus-equine-oral-gel.html">http://www.drugs.com/vet/quest-plus-equine-oral-gel.html</a>	Available by prescription only and to be taken only under the monitoring of a physician.  Contraindicated for people with pre-existing conditions involving the liver, kidney, or heart.  Praziquantel may cause side effects including headache, dizziness, stomach pain, nausea, fever, itching, hives (especially serious). <a href="http://www.ncbi.nlm.nih.gov/pmc/articles/PMC10000474/">http://www.ncbi.nlm.nih.gov/pmc/articles/PMC10000474/</a> <a href="http://www.rxlist.com/biltricide-drug/patient-images-side-effects.htm">http://www.rxlist.com/biltricide-drug/patient-images-side-effects.htm</a>
90.	<b>Prednisone</b>	Human and horse steroid 21 USC § 522.1890 - Horses, dogs and cats - "Not for use in horses intended for human consumption."	Steroids should be taken under a doctor's supervision and have multiple significant adverse affects including severe allergic reactions, hormonal changes, changes in menstrual functions, mental and mood changes, respiratory problems, nausea and vomiting, joint swelling, vision changes, and unusual weight gain.
91.	<b>Prostaglandin</b>	Lutalyse solution Horse and human use – regulation of	Can cause unknown and unwanted hormonal effects, including termination of pregnancy, to individuals who ingest without knowing.

	<b>Drug</b>	<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
96.	<b>Rabies vaccination</b>	Innovax Rabies Vaccine	The dangers of human ingestion are unknown.
97.	<b>Ractopamine hydrochloride</b>	Optaflexx 100 Premix Beta-agonist used for growth promotion purposes	A January 2012 article reported that ractopamine hydrochloride is “[f]led to an estimated 60 to 80 percent of pigs in the United States, [and has] has sickened or killed more of them than any other livestock drug on the market.” While the FDA has approved the drug for use in cows and pigs, many countries have banned it from food-producing animals, and the drug has never been tested on horses intended for human consumption. <a href="http://bottomline.msnbc.msn.com/_news/2012/01/25/10220221-dispute-over-drug-in-feed-limiting-us-meat-exports">http://bottomline.msnbc.msn.com/_news/2012/01/25/10220221-dispute-over-drug-in-feed-limiting-us-meat-exports</a>
98.	<b>Rhinopneumonitis vaccine</b>	5-way (vaccination) <a href="http://www.alpineanimal.net/page62_63a3c5.htm?inc=na">http://www.alpineanimal.net/page62_63a3c5.htm?inc=na</a>	Unknown consequences for humans.
99.	<b>Ronidazole</b>	Antiprotozoal agent <a href="http://www.wedgewoodpetrx.com/ie_ms/ronidazole-capsule.html">http://www.wedgewoodpetrx.com/ie_ms/ronidazole-capsule.html</a>	Does not appear to have any human applications. Dangerous side effects in animals. Toxicity information and potential health effects are unknown. <a href="https://www.reagentworld.com/products/msds2.asp?prod_id=23072">https://www.reagentworld.com/products/msds2.asp?prod_id=23072</a>
100.	<b>Selenium</b>	Trace mineral supplement 21 USC § 522.2100 “Do not use in horses intended for food.”	Rare but potential side effects include nausea, vomiting, abdominal pain, hearing loss, fatigue, weight loss, muscle tenderness, heart failure, and allergic reactions.
101.	<b>Stanozolol</b>	Anabolic steroid Used in both animals and humans. 21 USC 522.2150 “Not for use in horses intended for food.”	Potential side effects of anabolic steroids are well-documented. Steroids should be taken under a doctor’s supervision and have multiple significant adverse affects including severe allergic reactions, hormonal changes, changes in menstrual functions, mental and mood changes, respiratory problems, nausea and vomiting, joint swelling, vision changes, and unusual weight gain <a href="http://www.petplace.com/drug-library/stanozolol-winstrol/page1.aspx">http://www.petplace.com/drug-library/stanozolol-winstrol/page1.aspx</a>
102.	<b>Stilbenes</b>	Used in estrogen-related substances	Animals treated with these drugs are banned from meat production in the European Union. <a href="http://eur-lex.europa.eu/smartapi/cgi/sga_doc?smartapi!celexplus!prod!CELEXnumdoc!lg=EN&amp;numdoc=220081.0097">http://eur-lex.europa.eu/smartapi/cgi/sga_doc?smartapi!celexplus!prod!CELEXnumdoc!lg=EN&amp;numdoc=220081.0097</a>
103.	<b>Strangles vaccine (Streptococcus Equi vaccine)</b>	Vaccination for <i>streptococcus equi</i> <a href="http://www.aacp.org/strangles.htm">http://www.aacp.org/strangles.htm</a> Pinnacle I.N. (strangles)	Dangers of human ingestion unknown.

	<b>Drug</b>	<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
		<a href="http://www.drugs.com/vet/pinnacle-i-n.html">http://www.drugs.com/vet/pinnacle-i-n.html</a>	
104.	<b>Sucralfate</b>	Used to aid in healing gastrointestinal tract, ulcers, for humans and animals.	Adverse reactions include constipation, diarrhea, nausea and vomiting, pruritus, rash, dizziness, insomnia, back pain, headache, dry mouth, flatulence, gastric discomfort, indigestion, sleepiness.  <a href="http://www.pdr.net/search/searchResult.aspx?searchCriteria=Sucralfate">http://www.pdr.net/search/searchResult.aspx?searchCriteria=Sucralfate</a>
105.	<b>Sulfadiazine</b>	Tribriissen (oral) 400 paste 21 CFR § 520.221.5 - "Do not use in horses intended for human consumption."  21 CFR § 520.222.6a - "Do not use in horses intended for human consumption."  <a href="http://www.drugs.com/vet/tribriissen-400-oral-paste.html">http://www.drugs.com/vet/tribriissen-400-oral-paste.html</a>	Sulfadiazine has potential cross-sensitivity with other drugs in the same class. Some individuals will have blood cell destruction from the drug. It can also cause transient leukopenia, skin necrosis, skin discoloration, burning sensation, rash, interstitial nephritis, and other systemic reactions.  <a href="http://www.pdr.net/search/searchResult.aspx?searchCriteria=Sulfadiazine">http://www.pdr.net/search/searchResult.aspx?searchCriteria=Sulfadiazine</a>
106.	<b>Sulfamethoxazole Trimethoprim</b>	Antibacterial Bactrim, Septra	While these drugs are approved for human use, unnecessary ingestion of antibiotics is medically contraindicated. Additionally, adverse reactions include nausea and vomiting, anorexia, allergic skin reactions (e.g., rash, urticaria), agranulocytosis, aplastic anemia, hepatitis, renal failure, hyperkalemia, aseptic meningitis, arthralgia, convulsions, cough.
107.	<b>Sunscreens</b>	Components in various fly spray products  <a href="http://www.horse.com/ContentFiles/Associated_Content/UltrashieldIndexLabel.pdf">http://www.horse.com/ContentFiles/Associated_Content/UltrashieldIndexLabel.pdf</a>	While sunscreens are used by humans, there is no substantial literature or studies on ingestion of sunscreens or their byproducts and metabolites.
108.	<b>Testosterone enanthate</b>	Uni-Bol Male sex hormone  <a href="http://www.drugs.com/vet/uni-bol-can.html">http://www.drugs.com/vet/uni-bol-can.html</a>	The ingestion of male hormones, when not medically indicated, can create hormonal imbalances. Additionally, use may cause dangerous reactions in hypersensitive individuals or those with other illnesses. Can increase prostate and other problems in elderly men.  Can also cause hormone-mediated reactions, fluid and electrolyte disturbances, nausea, cholestatic jaundice, alterations in liver function, headache, and anxiety. It is also designated as "not for use" in nursing mothers.  <a href="http://www.pdr.net/drugpages/concisemonograph.aspx?concise=2017">http://www.pdr.net/drugpages/concisemonograph.aspx?concise=2017</a>
109.	<b>Thiamine HCl</b>	Included in liver 7 injection  <a href="http://www.drugs.com/vet/liver-7-injection.html">http://www.drugs.com/vet/liver-7-injection.html</a>	Hazardous in case of ingestion.  <a href="http://www.sciencecelab.com/msds.php?msdsId=9925232">http://www.sciencecelab.com/msds.php?msdsId=9925232</a>

	<b>Drug</b>	<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
ii0. Thyrostats	Thyroid-related growth promotion Antithyroid agents for the purpose of growth promotion	Animals treated with these drugs are banned from meat production in the European Union. <a href="http://eur-lex.europa.eu/smartapi/cgi/ssga_doc?smartapi!celexplus!prod!CELEXnumdoc&amp;lg=EN&amp;numdoc=32008L0097">http://eur-lex.europa.eu/smartapi/cgi/ssga_doc?smartapi!celexplus!prod!CELEXnumdoc&amp;lg=EN&amp;numdoc=32008L0097</a> .	
111. Topazone Aerosol Powder	Antibacterial Topazone Furox	Contains chemicals known to the state of California to cause cancer. Should only be taken under strict medical oversight; dangerous if taken with alcohol, when pregnant, or for individuals with certain blood disorders. Adverse effects include headache, stomach upset, nausea, vomiting, dizziness or weakness, fever, skin rash, itching, muscle aches, flushing, breathing trouble. This medication may cause the urine to turn brown in color.	
112. Triamcinolone Acetonide	Component in Animax ointment Antimicrobial, anti-fungal, steroid (for thrush treatment) 21 CFR § 520.2483 - tablets - “Do not use in horses intended for human consumption.” 21 CFR § 522.2483 - Suspension - “Do not use in horses intended for human consumption.”	Steroids should be taken under a doctor's supervision and have multiple significant adverse affects including severe allergic reactions, hormonal changes, changes in menstrual functions, mental and mood changes, respiratory problems, nausea and vomiting, joint swelling, vision changes, and unusual weight gain.	
113. Trimethoprim	Uniprim antibiotic Powder For treatment of <i>Streptococcus equi</i> (“Strangles”)	Trimethoprim is a strong antibiotic with multiple potential adverse reactions, adverse interactions with other drugs and hypersensitivities noted in individuals with various diseases and metabolic conditions. <a href="http://www.ncbi.nlm.nih.gov/pubmedhealth/PMH0000813/">http://www.ncbi.nlm.nih.gov/pubmedhealth/PMH0000813/</a>	

	<b>Drug</b>	<b>Product/Type/Warnings</b>	<b>Potential problems from human ingestion of residue or metabolites</b>
		<a href="http://www.drugs.com/vet/tribissen-400-oral-paste.html">http://www.drugs.com/vet/tribissen-400-oral-paste.html</a> <a href="http://www.drugs.com/vet/uniprim-powder.html">http://www.drugs.com/vet/uniprim-powder.html</a>	
114.	<b>West Nile virus</b>	Recombitek West Nile Vaccine <a href="http://www.drugs.com/vet/recombin-equine-west-nile-virus-can.html">http://www.drugs.com/vet/recombin-equine-west-nile-virus-can.html</a>	This vaccine has only been approved for use in horses and no data exists with respect to the safety of humans eating it, or meat from animals who have received it.
115.	<b>Xylazine</b>	Sedative Anased 21 CFR § 522.2662 - "Not for use in horses intended for food." - "Do not use in domestic food-producing animals."	Xylazine poisoning causes hypotension, bradycardia, and respiratory depression. Ocular administration can cause sinus bradycardia, hypotension and decreased mental status.  Velez L.I., Shepherd G, Mills L.D, Rivera W., <i>Systemic toxicity after an ocular exposure to xylazine hydrochloride</i> , J. EMERG. MED. 30(4):407-10 (2006).

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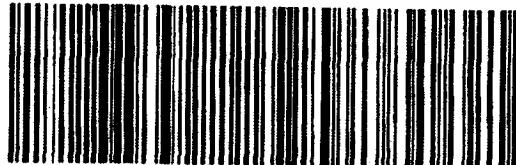
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