



INTERNATIONAL
EQUINE
BUSINESS
ASSOCIATION

July 9, 2012

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

Dear Secretary Vilsack,

The International Equine Business Association urgently petitions your agency to respond promptly with the necessary grants of inspection for those equine processing facilities that have already requested them, and whose facilities meet the requirements for the processing of the equine species.

While the rest of Agriculture is enjoying more prosperous circumstances than has been experienced in many years, the horse industry is devastated. All of the major breed registries report over 70% reductions in the number of foals being born. Obviously that translates into a reduction in the overall horse industry of painful loss of jobs, lack of opportunity, net worth evaporated, and value of livestock destroyed by the lack of market.

Your agency was regulating this industry five short years ago, and nothing of any real significance has changed. It is my understanding that the agency did not lay off any inspectors as the result of the Texas and Illinois plants closing. Reasonable logic would indicate that some of those inspectors are still working for the agency, and in any case, a couple of weeks of training for an experienced inspector should be more than sufficient.

There may be minor tweeks necessary in order to restart export capability to the European Union, but our member companies already have contracts ready to take product to Russia and other nations outside of the E.U. that will accept USDA certification exactly as it existed in 2007. These companies also have specialty and ethnic markets ready to buy product in the United States. Also, it is important to note that 74% of the horses processed in Canada last year originated in the U.S., and a higher percentage of the horses in Mexico—both countries are meeting all E.U. requirements with those U.S. horses. Until USDA responds with the appropriate inspection, which you are required by law to provide, we continue to export our jobs, our opportunity, and our horses at very low prices to other countries who are able to add the value and gain the benefit that should rightfully be the opportunity of U.S. businesses.

Therefore, we join with the tribes, the states, and the counties to petition you to provide grants of inspection to those companies who have made the investment and meet the requirements today. Do so under emergency rules, if you have to, that go above and beyond what will ultimately be

International Equine Business Association . 818 Connecticut Ave NW . Suite 950 . Washington, D.C. 20006

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required in order to ensure that horses are free of any drug residue and eligible for processing. The industry is willing to work with you to test every single horse if that is required.

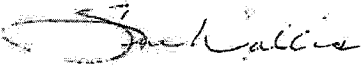
While only a few companies have progressed to the point that they have officially contacted your agency with requests for inspection, many more are in the pipeline hoping and praying for a favorable response so that they, too, can move forward. Currently there are proposed projects in at least 18 different states and 12 tribal nations. Some of these projects will be ready to meet requirements in the next few months, others are being built from the ground up and will take longer.

Meanwhile, hard hit local economies are losing more of their horse businesses every day. Meanwhile businesses ready to add hundreds of jobs are sitting idle. Meanwhile far too many horses are rendered literally worthless because their highest and best purpose is as meat animals, and if they aren't close enough to the border to be worth the trucking, either get killed and rot in a ditch, or suffer far worse fates of starvation and neglect because they have absolutely no value—either way represents a total, and absolutely unnecessary waste of livestock and meat that is wanted by a very willing market both domestically and overseas.

We noted with interest your comments reported recently in the agricultural press that you have met with business and community leaders to discuss how continuing demand for American food and agricultural products abroad has led to the three best consecutive years for U.S. farm exports in our nation's history. You were reported to have said that the success of American agriculture is a positive economic story that is creating jobs in rural America and benefitting people around the world. The horse industry has been cut completely out of that positive economic story—the herds are liquidated, the sale barns and horse equipment dealers are closed, the jobs are gone, the market is so low as to be virtually nonexistent—without your cooperation to allow this industry to begin rebuilding all hope is lost.

Attached please find letters from the National Association of State Departments of Agriculture, the National Tribal Horse Coalition, the National Conference of State Legislatures, State Ag and Rural Leaders, both the Eastern and Midwestern Conferences of the Council of State Governments, and the National Association of Counties who are all emphasizing the urgent necessity of providing the regulation to allow this industry to begin to rebuild.

Sincerely,



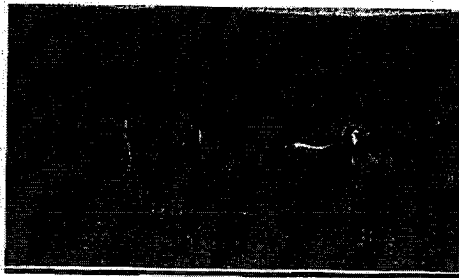
Sue Wallis, Chair
United States

Bill des Barres
Canada

Olivier Kemseke
European Union, Mexico, Argentina

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National Tribal Horse Coalition

Honorable Thomas Vilsack, Secretary
United States Department of Agriculture
1400 Independence Avenue SW
Washington, D.C. 20250

June 22, 2012

RE: Horse Welfare and USDA Inspections

Dear Mr. Secretary,

As President of the National Tribal Horse Coalition (NTHC), I want to support your efforts to stand behind the legislation signed into law by President Obama to again allow USDA horse meat inspections. The President's decision is considered humane agricultural reform and we applaud him for making that stand, and look to you to implement this law, by granting requested inspections, with a sense of urgency that they so desperately deserve.

We, along with American Veterinary Medical Association (AVMA), American Quarter Horse Association (AQHA), and National Association of State Departments of Agriculture (NASDA), share with you and President Obama the importance of animal welfare. Implementing this law is a major step in that direction.

The rapid increase in the number of unwanted horses and the wide-spread decline of their condition lead the Senate Appropriations Committee to request a Government Accountability Office (GAO) inquiry into Horse Welfare in relation to the termination of USDA horse meat inspectors.

The GAO concluded in their report, June, 2011: Even after the recent economic downturn is taken into account, horse abandonment and neglect cases are reportedly up, and appear to be straining state, local, tribal, and animal rescue resources. Clearly, the cessation of domestic slaughter has had unintended consequences, most importantly, perhaps, the decline in horse welfare in United States. The GAO report, in the section entitled "Matters for Congressional Consideration", page 44, went on to state: Congress may wish to consider allowing USDA to again use appropriated funds to inspect U.S. horses being transported to slaughter.

Also, Congress may wish to consider allowing USDA to again use appropriated funds to inspect horses at domestic slaughtering facilities, as authorized by the Federal Meat Inspection Act.

The Government Accountability Office (GAO) documented that the removal of funding for USDA inspectors of horse meat has resulted in widespread starvation, neglect, abandonment, and unnecessary suffering of this beautiful animal. In addition, this inspection ban has also resulted in unwanted horses being shipped great distances to processing facilities in Canada or Mexico.

The Joint House-Senate Conference Committee responded to the GAO study and resisted attempts to include the "rider" language that has prohibited funding for USDA ante-mortem horse inspection in recent years. As you know, President Obama signed this into law on November 18, 2011.

Without the ability for the USDA to inspect horse meat, prohibited by Congressional action since the 109th Congress, the horse market has been flooded, the prices for all horses have dropped dramatically, and the livelihood of horse ranchers—tribal and otherwise—has been severely jeopardized. A collateral effect of the glut of horses is the devastating impact their populations are making on the environment, and consequently, on our economy. By exceeding the carrying capacity of our Tribal lands, forage depletion is only part of the picture. Plants and animals important in tribal culture, spiritual practices and medicines are being damaged. Vegetation needed for big and small game has been diminished. Streams important to sport and Native American fisheries are degraded by valuable soils rolling off denuded slopes as a result of excess numbers of horses on tribal lands.

The NTHC believes that it is necessary to reduce the population of today's feral horses in order to rebalance our fragile ecosystems. Today, there are over 30,000 feral horses on tribal land in the Pacific Northwest region alone, and the numbers are increasing. Other regions are experiencing even greater horse numbers and impacts from this problem. These horse populations increase at an average of 20 percent every year. To compound the problem, many people outside of tribal lands, who have horses and can no longer afford them, are using our reservations as a place to abandon them.

With the re-instatement of funding authorization it is very important that USDA not put up administrative barriers that do not exist in law. We believe the administrative hoops you are proposing in your recent response to Sue Wallis, Chair of International Equine Business Association, are unwarranted in the main, and evince a reluctance on the part of USDA to fully respond to Congressional will. We submit that this is not in keeping with your obligations to trust lands and Indian populations you serve. We are CC'ing our Congressional delegation on this letter to keep them informed of our ongoing dialogue with USDA.

As new requests for USDA/FSIS horse meat inspections are made, and as we move forward to protect our tribal sovereignty and treaty rights, the NTHC stands together with the AVMA, AQHA, and NASDA to support your efforts to carry out the will of Congress and President Obama, that will promote and enhance the horse economy in its totality, protect the horse from unnecessary suffering, and assure that horse meat inspection remains a viable and humane option to improve conditions for horses, our natural resources, and our tribal economies.

Sincerely,



Jason Smith, President
National Tribal Horse Coalition
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Email: jason.smith@wstribes.org

The National Tribal Horse Coalition began a few years ago with five tribes to have a voice on how to mitigate the effects of rapidly increasing numbers of unwanted horses on tribal lands in the Pacific Northwest: Confederated Tribes of Warm Springs (Oregon), Confederated Tribes of the Umatilla Indian Reservation (Oregon), Confederated Tribes and Bands of the Yakama Nation (Washington), Confederated Tribes of the Colville (Washington), and the Shoshone Bannock (Idaho). As the numbers of unwanted horses is also prevalent on other tribal lands, the NTHC is expanding to represent tribes in the Southwest and mid eastern regions of the United States. We are pleased that the both the Affiliated Tribes of Northwest Indian (ATNI) and the National Congress of American Indians (NCAI) have passed resolutions at their regional and national meetings endorsing the positions of the NTHC.



2012 Legislative Agriculture Chairs Summit

Resolution on Reasonable Regulation of Equine Processing

- Whereas,** the State Ag and Rural Leaders, (SARL) is comprised of agriculture and rural leaders of state and provincial legislative bodies from the US and Canada; and
- Whereas,** The agriculture budget appropriations riders that prevented the U.S. Department of Agriculture inspection of horse processing plants have now been removed from the federal budget; and
- Whereas,** companies seeking to create jobs and restore the economic viability of the entire horse industry are organizing enterprises nationwide; and
- Whereas,** the federal government has failed to respond to European Union and other foreign governmental bodies in a manner that would allow commerce in equine products to recommence without delay; and
- Whereas,** there may be other areas as yet undiscovered that would impede the use of equine products for export, or for domestic use; and
- Whereas,** animal activist groups continue to use propaganda and misleading campaigns to prevent the ethical and responsible use of horses, and seek to compromised the private property rights of horse owners; now therefore be it
- Resolved,** that State Agriculture and Rural Leaders urges all governmental agencies to use sound science and responsible regulation in addressing this newly emerging industry in order to work in partnership with private companies to implement a world class system that ensures quality, safety, and proper handling of livestock; and be it further
- Resolved,** that this resolution be sent to the President of the United States, the Secretary of Agriculture, the Chair and Ranking Member of the U.S. Senate and House Agriculture Committees, and to others as deemed necessary and advisable.

*Approved by members of State Agriculture and Rural Leaders
Legislative Agriculture Chairs Summit
January 8, 2012 - Arlington, Virginia*

**State Agriculture and Rural Leaders
www.agandrurallleaders.org (765) 893-8209**



Policy Platform

Property Rights of Horse Owners: NACo calls for the humane treatment of horses in the ownership, raising, transporting, and processing that is carried out under the supervision of USDA.

NACo opposes efforts to curtail the property rights of horse owners and specifically opposes S. 727 and its House companion, H.R. 503, which propose to "amend the Horse Protection Act to prohibit the shipping, transporting, moving, delivering, receiving, possessing, purchasing, selling, or donation of horses and other equines to be slaughtered for human consumption, and for other purposes". The only three remaining horse processing plants in the United States were shut down in 2007 by state laws. This federal legislation will make it illegal to transport horses to a packing plant or to release any horses to any Canadian or Mexican packing plants, thereby totally shutting down the "harvest" market for used and unwanted horses.

There are currently 60,000 to 90,000 horses originating from the United States that are slaughtered annually in Mexico and Canada. The meat is shipped to Italy, France, Belgium, Holland, and Japan.

In addition, only about 6,000 spaces are available nationwide for horse rescue facilities and the vast majority are already full. Unwanted horses are detrimental to county governments. Horse owners release their unwanted horses into the wild, thus making it the county's responsibility to collect and dispose of them. Not only is this a public health issue, but it will also be quite costly.

This is also a property rights issue. Horse owners who wish to seek an additional value for their spent horses by sending them to slaughter should have the right to do so. Those who wish to retain them to die of old age, or euthanize and bury them on the farm or ranch should have that right as well.



NATIONAL CONGRESS OF AMERICAN INDIANS

The National Congress of American Indians Resolution #NGF-09-017

TITLE: Opposition to Any/All Horse Slaughter Acts, Also Supporting a Tribal Amendment Allowing Tribes to Establish Horse Slaughter Facilities within Their Jurisdiction

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WHEREAS, we, the members of the National Congress of American Indians of the United States, invoking the divine blessing of the Creator upon our efforts and purposes, in order to preserve for ourselves and our descendants the inherent sovereign rights of our Indian nations, rights secured under Indian treaties and agreements with the United States, and all other rights and benefits to which we are entitled under the laws and Constitution of the United States, to enlighten the public toward a better understanding of the Indian people, to preserve Indian cultural values, and otherwise promote the health, safety and welfare of the Indian people, do hereby establish and submit the following resolution; and

WHEREAS, the National Congress of American Indians (NCAI) was established in 1944 and is the oldest and largest national organization of American Indian and Alaska Native tribal governments; and

WHEREAS, the Tribes of the Northwest have for many years spent countless man hours and funding protecting and re-establishing the ecosystem from degradation; and

WHEREAS, the Tribes of the Northwest are home to over 20,000 head of unclaimed/feral horses that are overgrazing and destroying the rangeland of the northwest reservations that are damaging spring developments, stream bank restoration, fish habitat and culturally significant plants; and

WHEREAS, various political co-sponsors have introduced and reintroduced legislation into the House of Representatives (HR 503) and Senate (S 727) amending the 1970 Horse Protection Act (HPA) to prohibit the showing, transport or sale of horses that have been subject to any painful process to accentuate their gate; and

WHEREAS, the Federal Government has a trust responsibility to protect the interests of Tribal Nations as well as a duty to implement laws passed to benefit those Tribes, yet it failed to consult or communicate with any Tribes prior to taking position on HR 503; and

WHEREAS, the horse market represents a significant market that reservation horse producers need to sustain their livestock operations, in the productive utilization of tribal and allotted lands; and

WHEREAS, the Northwest Tribal Horse Coalition (NTHC) is adopted as a sub-committee of Intertribal Agriculture Council (IAC) and requests the Department of Interior, Bureau of Indian Affairs provide a funding source for horse management practices.

NOW THEREFORE BE IT RESOLVED, that the NCAI supports a tribal amendment to any legislation pertaining to horse slaughter, authorizing Tribes to establish horse slaughter facilities within their jurisdiction; and


BE IT FURTHER RESOLVED, that the NCAI supports a request for development of a line item specific for management of overpopulation of horses from the Department of Interior; and

BE IT FURTHER RESOLVED, that the NCAI calls on the Department of Interior/Federal Government to support the Tribes position opposing legislation that bans the slaughter of horses for human consumption; and

BE IT FINALLY RESOLVED, that this resolution shall be the policy of NCAI until it is withdrawn or modified by subsequent resolution.


CERTIFICATION

The foregoing resolution was adopted by the General Assembly at the 2009 Mid-Year Session of the National Congress of American Indians, held at Conference Center Niagara Falls in Niagara Falls, New York on June 14-17, 2009, with a quorum present.



President

ATTEST:



Recording Secretary



NATIONAL CONFERENCE of STATE LEGISLATURES

The Forum for America's Ideas

USDA INSPECTION OF HORSE MEAT

Policy of the NCSL Agriculture & Energy Standing Committee

USDA ante-and post mortem inspections are mandatory if an animal is to be sold as meat, and the animal must be slaughtered in a USDA-inspected facility. Federal appropriations law contains a prohibition on allowing federal dollars to be spent on salaries for inspectors who inspect horses before or after slaughter, making it impossible for operations that want to process horse meat within their borders to market this meat. Inspectors also cannot respond to a voluntary, fee-based inspection request to inspect horsemeat. The National Conference of State Legislatures (NCSL) believes that these provisions unduly restrict states' actions regarding horse slaughtering facilities within their borders. Therefore, NCSL calls upon Congress to remove these restrictions in existing law, and not insert similar provisions in subsequent appropriations bills or other legislative vehicles.

The closing of horse slaughter facilities in America has decimated the equine industry, and has curtailed the ability of states and tribes to control the numbers of excess and abandoned horses on their lands. Documented reports indicate an increase of 400% in the number of starved, abandoned, and neglected horses between 2008 and 2009 alone. This has resulted in unprecedented state budget increases and taxpayer costs at a time when states cannot afford unnecessary expense. It has severely impacted the livestock industry as a whole, and by eliminating the salvage value of horses has significantly reduced the market value of all horses. The loss of markets for horse meat for pet food, for the maintenance of zoo animals, and for byproducts has greatly impacted these sectors. The loss of horse products for export has eliminated more than \$42 million dollars of direct income for an already struggling sector of the livestock industry, not to mention millions of dollars in indirect costs because of the loss of value of individual animals. Given the current state of the horse processing industry, it is particularly important that the federal government not restrict access to inspection.



NATIONAL CONFERENCE of STATE LEGISLATURES

The Forum for America's Ideas

HORSE INDUSTRY

Policy of the NCSL Agriculture & Energy Standing Committee

In recent years, the processing of horses has become a controversial and emotional issue and has resulted in the closing of the last horse processing facility in the United States. Federal legislation has been introduced to amend the 1970 Horse Protection Act to prohibit the possession, sale, transport or shipping of horses for processing. The National Conference of State Legislatures urges members of Congress to oppose such legislation.

The loss of secondary markets has decimated the equine industry, severely impacted the livestock industry as a whole, and by eliminating the salvage value of horses has significantly reduced the market value of all horses. The loss of markets for horse meat for pet food, for the maintenance of zoo animals, and for byproducts has greatly impacted these sectors. The loss of horse products for export has eliminated more than \$42 million dollars of direct income for an already struggling sector of the livestock industry, not to mention millions of dollars in indirect costs because of the loss of value of individual animals.

The loss of the highly regulated and humane processing facilities in the United States has overwhelmed the ability of government and private rescue organization's ability to deal with the scope of the problem; and has overburdened state and local agencies charged with regulating the transfer, transport, and welfare of horses. Without affordable and economic alternatives, unwanted horses are abandoned, and in the Western US the additional pressure on public lands from horses turned out to run wild is only intensifying the over-population, over-grazing, and ultimate destruction of the ecosystem. State livestock programs that used to be able to recoup the costs of caring and feeding for abandoned and estray animals by marketing them, are now forced to greatly increase their budgets at the expense of taxpayers.

The Horse Welfare Coalition estimates that in excess of 100,000 unwanted horses annually, without any market value whatsoever, will be exposed to potential abandonment and neglect because of the cessation of horse processing in the United States. Efforts to prohibit the transport and export of horses can only exacerbate this problem. These additional unwanted horses will compete for adoption with the 32,000 wild horses that are currently fed and sheltered at a public expense of \$40 million. The nation's inadequate and overburdened horse rescue and adoption facilities cannot begin to handle the influx of additional unwanted and abandoned horses.

In the United States the harvest of all animals, including horses, is highly regulated to provide for the humane handling of the animals as well as for a safe and wholesome product. Horse processing in the United States is particularly tightly regulated, and the horse is the only animal whose transportation to processing is regulated. Horse processing facilities in the United States are required to have United States Department of Agriculture (USDA) veterinarians supervise the euthanasia, and the euthanasia method is humane, according to the American Veterinary Medical Association and the United States Department of Agriculture. Since the closing of horse processing facilities in the United States, horses have increasingly been sent across the borders for processing. In 2007, 35,000 horses were sent to Canada for slaughter, a forty-one percent increase from the previous year, while horse exports to Mexico have more than tripled. Equine processing in many foreign facilities is not held to the standards for humane handling and euthanasia required in the United States and often involves practices that would not be tolerated in this country.

The majority of world cultures, including French speaking Canada, and Mexico, most of Europe and Asia have provided a willing market for the US horse industry. These, and ethnic markets inside the US would appreciate an additional source of high quality protein untainted by disease concerns of other species of livestock.

NCSL urges Congress to oppose legislation that would restrict the market, transport, processing, or export of horses, to recognize the need for humane horse processing facilities in the United States, and not to interfere with State efforts to establish facilities in the United States.

Expires August 2012