

July 31, 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,

On behalf of the International Equine Business Association and the horse businesses of the United States I am writing to urge your agency to immediately provide the inspection necessary to humanely and safely process horses in facilities that are ready to do so in the United States. The horse industry is already severely damaged because of the lack of market and options, and now with wide spread drought and wild fire damage, the situation is truly dire.

Attached please find an urgent petition, and background information supporting this letter.

USDA stands squarely in the way of enterprises that could offer some relief and a humane option for many of these horses. It has come to our attention that USDA is promulgating directives to states that indicate the agency has no intention of providing the inspection they are required by long-standing U.S. law to provide, and are actively discouraging state departments of agriculture from implementing any kind of state inspection. This singles out one class of livestock owner for economic harm and persecution that is extremely detrimental-leaving many with no option except to destroy valuable animals, or to sell them at pathetically low prices and allow them to be hauled to other countries out of U.S. jurisdiction. In the face of widespread natural disaster, some would say this is the height of hypocrisy and completely counter to the mission of the USDA to promote and responsibly regulate agriculture in this country.

Several horse processing facilities are ready to offer horse owners a fair price for the animals they desperately need to sell -- or could be within days -- to provide much-needed emergency relief. Markets for the product are ready to accept it domestically and internationally if the meat is USDA-inspected exactly as it was in 2007.

USDA should not stand in the way of much-needed, humane options for horses. Horses and horse people are uniquely suffering as a direct result of federal government inaction, and the Department's refusal to provide the inspection services federal law requires USDA to provide.

Across the nation, states, tribes and private citizens are working hand-in-hand with the federal government to provide relief to every other breed of livestock,

and every other kind of business, yet USDA stands directly in the path of the same relief for the horse industry.

This is a moral and ethical imperative that USDA must address without delay.

Sincerely,

Sue Wallis, Chair
United States

Bill des Barres
Canada

Olivier Kemseke
European Union, Mexico, Argentina

BACKGROUND INFORMATION TO SUPPORT URGENT PETITION TO USDA TO IMPLEMENT EMERGENCY HORSE PROCESSING INSPECTION

Across the nation, U.S. livestock and agricultural resources are being wiped out by widespread drought, compounded by enormous wildfires destroying summer forage and winter feed. Headlines for just a single day scream the following: "Wyoming Drought Strikes Hard at State's Livestock Herd, [i]" "Drought forces Ozarks farmers to sell livestock much earlier than usual [ii]," "Arkansas Drought Threatens Cattle Industry [iii]," and because of the weather, "USDA slashes corn, soybean production estimates[iv]," "Drought-Driven Wildfires Challenge Western Producers [v] and "Oregon Wildfires Burns, Kills Cattle [vi]." Forage and feed in short supply means prices are sky rocketing and will continue to rise. Everywhere livestock owners are downsizing herds while desperately searching for winter feed without much hope.

Thankfully there is still a good market for cattle and sheep, and owners are receiving fair prices which will allow them to restock and rebuild their herds when circumstances change. Horse owners don't have that kind of predictable market so they stand to suffer in horrific numbers if USDA does not act immediately to implement the inspection of horse processing facilities.

One South Dakota rancher posted a common sentiment, one shared by nearly every livestock owner faced with these tough decisions. Robert Dennis writes:

"Well, we are in a drought. I have too many horses, as they stopped the slaughter of horses and I refuse to put any I like through what it would take to get them out of the country for a Mexican to stab them to kill them or ship them up into Canada on a crowded truck, let alone pay the fuel bill to get them somewhere

where I might get \$200 bucks a head, if I am lucky. So I will need to cull some of these older and not- good-enough-to-breed mares and fillies. I will take them out and give them a bite of grain and put them down humanely with my rifle. Then I'll haul them to the horse graveyard on this place. What would any of you do? Or do any of you want some free horses? Just come and get them... no really, I doubt I'd give a horse to anyone unless I knew them and how they would treat them. My feelings are, there are a lot worse things in life than dying. All of my horses live a good life, right up to the end.

I guess it's just come to the time for some of them to come to the end quicker than normal as I cannot afford to feed them this winter at these kinds of hay prices. Yeah, this is what happens when you take away horse slaughter plants in the U.S. Too bad, seems someone could have at least used the meat after they are dead....guess the coyotes and other scavengers will."

A Montana rancher, Kirk Green, burned out by massive fires, estimates he and his neighbors are faced with well over 200 head of horses that will not be able to winter out as they generally do because all of the forage is completely burned out.

"How quick can you get the plants open? We are going to have to do something with these horses. We can't let them starve, and it hurts me to let these out of the country buyers get them for nothing. It's a damn waste and a damn shame to even consider shooting them where they stand, but I guess we'll do what we have to do."

In Wyoming, a breeder and horse trainer, Ingrid Buchmeier, writes looking for help in trying to find any humane solution:

"I don't think advertising horse meat as pet food like selling beef would work until we do have slaughter houses capable of slaughtering horses. I think we would need to kill and harvest the meat ourselves and then sell it from our home. I am not sure if I am tough enough to do that, but I sure as heck don't want to send them on that highway to hell that goes from WY to Mexico. I was just checking since at \$250 a ton for hay, if you can even find it, may necessitate drastic measures. In my own herd I have several retired horses and we normally put up plenty of hay. Our hay is a 100% loss, nada, zip this year. Quite a few folks are in the same boat as us in this area. The cattle can be sold, the sheep can be sold, the goats can be sold, but horses are a different story. These old retired horses (I have about six of them) will just go to feed coyotes or worms and it's a shame to feed our dogs corn and meat byproducts. I think it COULD be financially viable to sell horse meat for pet food right here in the good ol' USA. Do you know if you can ship horse meat across state lines for pet food?"

These are only three of many stories, all of which are just as dire.

USDA stands squarely in the way of enterprises that could offer some relief and a humane option for many of these horses. It has come to our attention that USDA is promulgating directives to states that indicate the agency has no intention of

providing the inspection they are required by long-standing U.S. law to provide, and are actively discouraging state departments of agriculture from implementing any kind of state inspection. This is outrageous, and singles out one class of livestock owner for economic harm and persecution that is extremely detrimental. In the face of widespread natural disaster, some would say this is the height of hypocrisy and completely counter to the mission of the USDA to promote and responsibly regulate agriculture in this country.

[i] http://farmprogress.com/western-farmer-stockman-story-nl16_18nl-wyoming-drought-strikes-hard-states-livestock-herd-9-61344?utm_source=newsletter&utm_medium=email&utm_campaign=12+July+2012

[ii] <http://www.kv3.com/news/kv3-a-lack-of-rain-scorching-temperatures-and-a-shortage-of-hay-are-making-this-year-one-of-the-toughest-for-farmers-in-the-ozarks-20120709,0,910759.story>

[iii] <http://video.msnbc.msn.com/nightly-news/48127198#48127198>

[iv] <http://brownfieldagnews.com/2012/07/11/usda-slashes-corn-soybean-production-estimates/>

[v] http://farmprogress.com/western-farmer-stockman-story-nl16_18nl-drought-driven-wildfires-challenge-western-producers-9-61266?utm_source=newsletter&utm_medium=email&utm_campaign=12+July+2012

[vi] <http://www.cattlenetwork.com/cattle-news/latest/Oregon-wildfire-burns-kills-cattle-162260515.html>

URGENT PETITION

We, the members and supporters of the International Equine Business Association representing literally thousands of horses and every aspect of the livestock business urgently petition you to implement equine inspection certification immediately.

Several horse processing facilities are ready to offer horse owners a fair price for the animals they desperately need to sell -- or could be within days -- to provide much-needed emergency relief. Markets for the product are ready to accept it domestically and internationally if the meat is USDA-inspected exactly as it was in 2007.

The International Equine Business Association (IEBA) has been formed as a production agriculture organization representing the equine industry, and it stands ready with well-developed quality assurance programs and food safety protocols designed to exceed USDA requirements.

We understand traceability is a priority, and that another priority is the prevention of drug residues in meat. IEBA proposes allowing the association's equine ID and tracing system - a system tested and proven in Canada - as an interim emergency measure. This system can be altered or amended later to fulfill any USDA requirements that may not be currently met, and can be updated when the Department finalizes its equine systems. IEBA also proposes its drug residue testing protocol - which uses third party laboratory testing to scientifically validate zero residues -- to establish the eligibility of every horse for processing prior to slaughter. Allowing the implementation of these systems now will provide the desperately needed humane and economically viable outlet for the drought and fire-impacted horse industry.

USDA should not stand in the way of much-needed, humane options for horses. Horses and horse people are uniquely suffering as a direct result of federal government inaction, and the Department's refusal to provide the inspection services federal law requires USDA to provide.

Across the nation, states, tribes and private citizens are working hand-in-hand with the federal government to provide relief to every other breed of livestock, and every other kind of business, yet USDA stands directly in the path of the same relief for the horse industry.

Therefore, as a moral and ethical imperative, we urgently petition the United States Department of Inspection to issue provisional or permanent grants of inspection to allow equine processing to begin immediately.