



**ANIMAL
JUSTICE**

Flying Above the Law:

Inside Canadian Horses' Long Journey to Japan

Prepared by Animal Justice
June 2024

Introduction

For nearly 20 years, Canadian companies have exported thousands of draft horses annually from feedlots in Alberta and Manitoba to overseas countries, primarily Japan, for slaughter. In 2023, government data shows that 2,513 horses were exported for this purpose, while in 2022, the number was 2,579.¹

Upon landing in Japan, the animals are unloaded from the plane, removed from the wooden crates in which they are shipped, and trucked to a quarantine facility. Eventually, they are transferred to barren feedlots where they are fattened up before being slaughtered. The horses are eaten as a raw delicacy.

Transporting horses from Canada to Japan causes significant physical and psychological suffering to horses, due to the duration and conditions of transport. Under the federal *Health of Animals Regulations*,² it is unlawful to transport horses without food, water, or rest for longer than 28 hours—which is already considered too lengthy by many animal welfare experts.

A shocking new investigation by Animal Justice and Japanese animal protection group Life Investigation Agency (LIA) shows that most shipments from Canada to Kansai and Kitakyushu airports in Japan appear to exceed this maximum time limit, unlawfully putting horses at even greater risk of distress, extreme hunger and thirst, injury, and illness.³ This issue is especially apparent in shipments departing from Winnipeg, nearly all of which appear to exceed this maximum time limit by at least two hours.

Approximately 68% of Canadians oppose the export of horses for slaughter overseas,⁴ and the Canadian government has committed to banning the practice. Two federal bills have been introduced to make good on this promise, but as the issue is studied by lawmakers, horses continue to be shipped from Canada to Japan for slaughter.

The Health of Animals Regulations and Canadian Food Inspection Agency Records

The *Health of Animals Regulations* permit horses to be transported for up to 28 hours without food, water, and rest. The 28-hour limit is already an unacceptably long time for horses to be in these conditions. Denying horses access to food and water for more than 24 hours can cause hunger and distress, given that horses naturally graze for eight or more hours per day, and can become dehydrated on long haul flights after just 10-15 hours.⁵ Horses transported for over 24 hours are likely to be markedly to very severely dehydrated. After 28 hours of transport, horses also show extreme fatigue.⁶ For horses exported overseas, this risk is compounded by the small wooden crates in which they are transported, which prevent them

¹ See: <https://canadianhorsedefencecoalition.org/stats/>.

² Health of Animals Regulations, CRC, c 296, s 152.2 (1991).

³ The findings of this investigation are also summarized in this video:

<https://animaljustice.ca/exposes/flying-above-the-law-inside-canadian-horses-long-journey-to-japan>

⁴ See, e.g. ResearchCo poll conducted for BC SPCA April 2024, available online:

<https://spca.bc.ca/ways-to-help/take-action/farm-animals/live-horse-export/>.

⁵ M. Stewart et al, “The effects of air transport on the behaviour and heart rate of horses”, *Applied Animal Behaviour Science* 80(2), Feb (2003) at pages 143-6.

⁶ See, e.g. T.H. Friend, “A review oof recent research on the transportation oof horses”, *Journal of Animal Science* 79:32-40 (2001).

from moving freely and make it difficult for horses to take steps to adequately compensate for changes in inertia forces to maintain balance.⁷



Long-distance travel can also cause a stress response and suppressed immune system in horses. In fact, recent scientific research in *Equine Disease Quarterly* shows clearly that even short road trips of under three hours can affect horses' endocrine and immune function.⁸

Industry representatives and Canadian Food Inspection Agency (CFIA) officials have repeatedly claimed that most shipments of horses overseas for slaughter fall well under the 28-hour legal limit. For instance, during the study of Bill C-355—a bill that aims to end the live export of horses by air for slaughter—by the the House of Commons Standing Committee on Agriculture and Agri-Food, Conservative MP and Agriculture Critic John Barlow claimed that the average travel time for horses exported for slaughter is 23 hours.⁹ Yet official travel time calculations by the CFIA generally end the moment a plane carrying horses touches down in Japan—even though horses are not provided food and water, or an opportunity to rest, the moment a plane lands. Instead, the horses are unloaded from the plane, removed from their wooden crates, loaded onto trucks, and transported to quarantine. An accurate record of travel duration must take this time into account.

⁷ B. Nivellet et al, “Horse transport to three South American horse slaughterhouses: A descriptive study”, *Animals* 10(4), 602 (2020).

⁸ <https://www.horsetalk.co.nz/2023/10/23/road-trips-horses-endocrine-immune-function/>

⁹ See, e.g. [House of Commons Standing Committee on Agriculture and Agri-Food Evidence](#) (February 13, 2024) at p13.

When asked by Canadian lawmakers how long it takes after landing before horses have the ability to eat, drink, and rest, industry representatives claimed the process is quick. For instance, one witness gave evidence that “[t]he last horse off the flight is back on feed, water and rest within two hours of landing.”¹⁰

Even based on the CFIA official travel times, the durations of travel for some shipments exceed the 28-hour limit, though it does not appear that enforcement action is usually taken. For instance, in December 2022 a shipment of horses from Winnipeg was delayed due to winter weather in Alaska. By the time the plane landed in Japan, the animals had been in transport without food, water, and rest for well over 28 hours and at least three horses had collapsed, yet the CFIA refused to take enforcement action. Animal Justice ultimately chose to pursue its own private prosecution against the export company.¹¹ Animal Justice and a coalition of groups also filed a complaint with the CFIA after a shipment of horses from Winnipeg to Japan on January 22, 2024 appeared to go well over the 28-hour legal limit. It does not appear that any enforcement action has been taken by the CFIA in regard to this shipment.

Results of Investigation

For the first time, Animal Justice has now compiled footage of both the departure of horses in Canada, and their arrival at their ultimate destination in Japan. Animal Justice worked with Life Investigation Agency to obtain footage from four different shipments of horses that were transported from Edmonton International Airport to Japan in May and June of 2024. The first of these shipments arrived in Kitakyushu on May 7, 2024 while the other three arrived at Kansai International Airport on May 21, June 11, and June 18, 2024.¹² Investigators recorded how long it took from the time the planes landed until all horses had been transported to the quarantine facilities, where they were ultimately unloaded and would only then have had access to food and water and an opportunity to rest.

For all four shipments, it took over four additional hours from the time the planes landed before the horses reached quarantine, and therefore had access to food, water and rest. For the June 18, 2024 shipment, exhausted horses did not arrive at the quarantine facility for over 6.5 hours after the plane landed.

Shipment 1

On May 5, 2024, 96 horses were loaded into trucks and transported from a feedlot in Alberta to Edmonton International Airport. Eyewitness observations suggest the feedlot was near Hanna, Alberta—approximately three hours away from Edmonton International Airport. According to records obtained by the Canadian Horse Defence Coalition through *Access to Information Act* request, the horses received their last food and water at the feedlot at 4:30 pm MT before being loaded onto trucks and being driven to the airport. The horses arrived at the airport at approximately 8:34 pm MT, and were then loaded onto the plane, which took off at 3:48 am MT on May 6, 2024. The plane flew for three hours to

¹⁰ See, e.g. [House of Commons Standing Committee on Agriculture and Agri-Food Evidence](#) (March 21, 2024) at p2.

¹¹ That private prosecution is ongoing. See further information here: <https://animaljustice.ca/blog/animal-justice-charges-horse-exporter>.

¹² Horses exported from Canada to Japan for slaughter are also shipped to Kagoshima Airport, At this time, Animal Justice and LIA have not documented any shipments arriving at that airport, so the data below reflects only shipments to Kitakyushu and Kansai airports.

Anchorage, Alaska, where it had a stopover, and then seven hours and 30 minutes to Kitakyushu, Japan. The CFIA timeline ends here, and CFIA documents indicate that the official duration of the trip was 23.90 hours, which would be within the 28-hour limit. However, the trip did not end here for the horses.

Eye witnesses in Japan observed that after landing in Kitakyushu, the horses were slowly unloaded from the plane and loaded onto trucks—some waiting for nearly four hours at the airport. They were then trucked to the Shin-Moji quarantine facility 30 minutes from the airport. This made the actual duration of travel time without food, water and rest at least 28.25 hours, exceeding the 28-hour legal limit.

Estimated Time of Last Feed and Water	Time of Flight Departure	Arrival in Kitakyushu	Arrival Time at Quarantine	Time between Arrival in Kitakyushu and Arrival at Quarantine	CFIA Official Duration	Actual Trip Duration
4:30pm MT	3:48am MT	7:24am JST	11:45am JST	4.35 hours	23.90 hours	28.25 hours

Shipment 2

The second shipment of horses was documented by eyewitnesses arriving at the Edmonton International Airport at 9:35 pm MT on May 19, 2024. Their flight departed at 5:54 am MT on May 20, 2024. Based on records related to past shipments arriving at the Edmonton airport around 9:30 pm, loading at the feedlot likely began between approximately 5:30 pm - 7:30 pm MT on May 19.¹³ After leaving Edmonton, the flight landed in Anchorage at 6:53 am AKDT. After an hour and 20 minute layover, the plane left for Kansai, where it landed at 9:05 am JST on May 21, 2024 (6:05 pm MT).

The Kobe Karumo quarantine facility near Kansai airport is approximately a one-hour drive. Horses did not begin arriving at the facility until 12:13 pm JST, and the final truckload of horses did not arrive until 2:23 pm JST on May 21 (11:23 pm MT)—five hours and 20 minutes after landing. The shipment appears to have taken a total duration of between 28 - 30 hours.

Estimated Time of Last Feed and Water	Time of Flight Departure	Arrival in Kansai	Arrival at Quarantine	Time between Arrival in Kansai and Arrival at Quarantine	Estimated Trip Duration
6 pm - 8 pm MT	5:54 am MT	9:05 am JST	2:23 pm JST	5.30 hours	28-30 hours

Shipment 3

¹³ Animal Justice is awaiting records requested through the *Access to Information Act* for the final three shipments tracked through this investigation.

On June 9, 2024 horses were shipped from a feedlot in Alberta to Edmonton International Airport, where they were flown to Kansai International Airport. The flight left at approximately 4:50 am MT on June 10, 2024 and, after a stopover in Alaska, landed in Japan at approximately 8:13 am JST on June 11. Based on records for previous flights, the final feed and water for the horses likely took place between 4:30 pm - 8:30 pm MT on June 9, 2024.

It was not until 1:09 pm JST (10:09 pm MT) that the horses appear to have arrived at the quarantine facility an hour's drive from the airport. This means that after landing in Japan, the animals were in transport without food, water and rest for approximately an additional four hours and 56 minutes. The shipment appears to have taken a total duration of between 25.5 - 29.5 hours.

Estimated Time of Last Feed and Water	Time of Flight Departure	Arrival in Kansai	Arrival at Quarantine	Time between Arrival in Kansai and Arrival at Quarantine	Estimated Trip Duration
4:30 - 8:30 pm MT	4:50 am MT	8:13 am JST	1:09 pm JST	4.93 hours	25.5 - 29.5 hours

Shipment 4

On June 16, 2024, horses were shipped from a feedlot in Alberta to Edmonton International Airport, where they were flown to Kansai International Airport. Eyewitnesses documented the horses arriving at Edmonton International Airport at approximately 10:16 pm MT on June 16. Based on records related to past shipments arriving at the airport at this time, the final feed and water for the horses likely took place between 5:45 pm - 8:15 pm MT.

The flight departed at 6:06 am MT and landed at Kansai International Airport at approximately 9:53 am JST (after a two hour and 20 minute stopover in Anchorage). The final truckload of horses arrived at the quarantine facility at 4:38 pm JST on June 18, 2024 (1:38 am MT). From the time the plane landed in Japan, the horses were in transport without food, water, and rest for approximately an additional six hours and 38 minutes. The shipment appears to have taken a total duration of approximately 29.38 - 31.88 hours.

Estimated Time of Last Feed and Water	Arrival at Edmonton Airport	Time of Flight Departure	Arrival in Kansai	Arrival at Quarantine	Time between Arrival in Kansai and Arrival at Quarantine	Estimated Trip Duration
5:45 pm - 8:15 pm MT	10:16 pm MT	6:06 am MT	9:53 am JST	4:38 pm JST	6.63 hours	29.38 - 31.88hours

Time Estimates Derived from the Investigation

Using CFIA official duration times and the evidence outlined above about the actual amount of time it takes for all horses to arrive at the quarantine facility after landing at Kitakyushu and Kansai airports, the charts below estimate the actual duration of other recent horse shipments over the past seven months for which government records are available.

Shipments Departing from Winnipeg

Departure Date	CFIA Official Duration (hours)	Arrival Airport in Japan	Estimated Time from Airport to Quarantine (hours)	Estimated Actual Trip Duration (hours)
November 27, 2023	26.00	Kitakyushu	4.35	30.35
January 22, 2024	29.68	Kansai	4.93 - 6.5	34.61 - 36.18
February 19, 2024	26.75	Kansai	4.93 - 6.5	31.68 - 33.25
March 11, 2024	25.87	Kitakyushu	4.35	30.22

Shipments Departing from Edmonton

Departure Date	CFIA Official Duration (hours)	Arrival at Airport in Japan	Estimated Time from Airport to Quarantine (hours)	Estimated Actual Trip Duration (hours)
November 20, 2023	21.37	Kansai	4.93 - 6.5	26.30 - 27.87
December 4, 2023	24.80	Kansai	4.93 - 6.5	29.73 - 31.3
December 11, 2023	25.42	Kitakyushu	4.35	29.77
January 10, 2024	20.87	Kansai	4.93 - 6.5	25.80 - 27.37
January 16, 2024	23.68	Kitakyushu	4.35	28.03
January 30, 2024	21.63	Kitakyushu	4.35	25.98
February 5, 2024	25.30	Kansai	4.93 - 6.5	30.23 - 31.8
February 12, 2024	22.93	Kitakyushu	4.35	27.28
February 26, 2024	27.05	Kitakyushu	4.35	31.40
March 18, 2024	24.68	Kitakyushu	4.35	29.03

As shown above, estimates show that 100% of the shipments from Winnipeg likely exceeded the 28-hour limit by at least two hours, and one shipment exceeded the 28-hour limit by over six hours. In total, approximately 60% of flights from Edmonton in this time period likely exceeded the limit.

Spraying of Horses with Chemical Disinfectant

On all three occasions where horses were shipped to Kansai Airport, the eyewitness observer saw and documented the horses being sprayed directly with what appears to be disinfectant. The disinfectant was sprayed on the trucks, which were open on the sides, as they entered the quarantine facility, causing the horses to be sprayed all over their bodies and leaving them to inhale the harsh chemicals. The eyewitness was documenting the shipments from several meters away and the wafting disinfectant was strong enough to cause them to experience pain and burning in their eyes and throat.

Spraying horses with disinfectant appears to be illegal in Canada pursuant to s 146.1 of the *Health of Animals Regulations*, which prohibits transporting an animal if they are likely to suffer by being exposed to anything toxic or noxious. Animals are at risk of the same physical and chemical hazards as humans when exposed to disinfectants.¹⁴ This includes, but is not limited to, irritation to the eyes, skin, mucous membranes, or respiratory tract; chemical burns from corrosive chemicals; respiratory distress; and allergic reactions. As such, disinfectants should not be applied directly to animals unless labeled for such use. In fact, most disinfectants should not be used at all when animals are present, and all disinfectants are toxic if ingested. They should be rinsed away before animals are introduced into the area.

To compound matters, horses desperate for water after more than a day without drinking were observed licking the disinfectant off of the trucks' netting.

Conclusion: Horse exports for slaughter frequently violate federal law

The prolonged duration of time that horses are in transit is a serious concern from an animal welfare perspective. Given evidence that the 28-hour transport limit has been repeatedly violated, it is imperative that the CFIA take enforcement action to hold offending companies to account and that it also take actions to control risk of continuing violations by immediately halting all horse exports for slaughter until the CFIA is certain that these shipments can reliably meet the 28-hour legal limit for transporting horses without food, water, and rest.

¹⁴ Iowa State University College of Veterinary Medicine, "Disinfection 101: Key Principles of Cleaning and Disinfection for Animal Settings", (2023) online (PDF): <https://www.cfsph.iastate.edu/Disinfection/Assets/Disinfection101.pdf> at 36-39.