



July 21, 2025

Christine Taylor
Director of Operations, Northern Alberta-Saskatchewan
Canadian Food Inspection Agency
301 11TH Avenue
Regina, Saskatchewan S4P 0H8

Tammy Kelly
Inspection Supervisor, Animal Health-Edmonton
Canadian Food Inspection Agency
6503 67 STREET
Red Deer, Alberta T4P 1A3

Alberta SPCA
17904 118 Avenue NW
Edmonton, AB T5S 2W3

Via email

Dear Ms. Taylor and Ms. Kelly, and to Whom It May Concern at the Alberta SPCA:

Re: Violations of Health of Animals Regulations and Animal Protection Act During Export of Horses for Slaughter

On behalf of Animal Justice and the Canadian Horse Defence Coalition, I am writing to request that you investigate and take enforcement action following the transport of live horses on April 13-14, 2025, in a manner that appears to contravene the Health of Animals Regulations, CRC, c 296 ("the Regulations") and the Animal Protection Act, RSA 2000, c A-41 (the "APA"). The details of this shipment and the apparent contravention of the Regulations and APA were set out in records recently obtained via Access to Information request.

Unlawful treatment of a downed horse during loading at the airport

On April 13, 2025, 99 horses were loaded into trucks at an unknown feedlot in Alberta and driven to the Edmonton Airport to be exported for slaughter. According to the exporter's records, the horses were moved to holding pens at approximately 6:00pm MT to begin the process of loading into the trucks.

The horses arrived at Edmonton International Airport at approximately 10:00pm MT, bound for Kitakyushu airport in Japan. The horses were loaded 3 per wooden crate and, as is usual practice, had a layover in Alaska before crossing the ocean to Japan.

The horses were loaded into wooden crates at the Edmonton Airport between 10:30pm MT and 11:50pm MT. The horses in crates were then loaded into the aircraft beginning at 2:00am MT on April 14, 2025. During the loading of horses into the aircraft, staff observed that one horse was sitting down in one of the crates, while the other 2 horses remained standing. The horse was a 3 year old brown Belgian gelding. The crate was removed from the loading line and transported to the facility for inspection. The CFIA Report of Inspector (the "Report") indicates that the horse was "moving his head", and was "alert", but "looked stressed". There is no indication that any person qualified to provide care attended to the distressed horse. Instead, according to the Report, staff who appear to have been employed or contracted by the exporter made "every effort" to make the horse get up, including prodding him with sticks and pouring water on him, which would almost certainly have caused additional distress and suffering for the young horse.

After half an hour of this torment, the horse had still not risen, and so staff asked permission to retrieve an electric prod to use on him. The request was denied due to the concern that an electric prod "might be painful and suffering to the horse". However, the Report indicates it was not until later that anyone checked the Regulations and discovered that s. 144(1) prohibits the use of an electric prod on horses during loading/confinement/transport. It is incredibly concerning that staff were seemingly unaware of this provision of the Regulations. This indicates a lack of knowledge and skills on the part of the carrier and exporter in violation of s. 138 and potentially 138.1(1) of the Regulations. It is unclear why individuals involved in the shipment had an electric prod on-hand given that it is unlawful to use such an instrument on horses during transport and loading.

Even without the illegal use of an electric prod, those involved likely contravened s. 144(1) by prodding the horse with a stick (see s. 144(1)(a) and (b) and (c)) and s. 144(1)(h) by handling him in a way that is likely to cause suffering, injury or death, namely, pouring water on him. The Report further indicates that after the request by horse handling staff to use an illegal device was denied, the same staff spent another 20 minutes trying to make the horse stand. We do not know what was done to this horse in that additional 20 minutes, as there is no record of what transpired in this time. The exact timeline of how long the horse was handled in violation of the law is not clear, but the Report indicates at least 50 minutes of the horse being goaded with sticks and doused with water while already visibly in distress.

Even if the horse had stood up after the 50 minutes of torment by staff, the horse was either unfit or compromised as defined in s. 136(l) of the Regulations, as he was unwilling or unable to stand due to extreme stress. This horse clearly exhibited signs of infirmity, illness, injury or of a "condition" that indicates a reduced capacity to withstand transport. Therefore, transporting the horse would have been in violation of ss. 139 or 140 of the Regulations, and, in attempting to do so, the actions of those responsible for shipment demonstrate a concerning disregard for the law.

Eventually, the horse was sent back to the feedlot of origin along with the two other horses in the crate, and the remaining 96 horses were loaded into the plane and exported to Japan for slaughter. The flight departed at 5:18am MT on April 14, 2025. It landed in Alaska at 8:30am MT to refuel and departed for Japan at 10:10am MT.

The treatment of this horse also appears to have contravened s. 2(1) of the APA. With respect to the activities exempt from this section by virtue of s. 2(2), I note that activities are only exempt if they are carried on in accordance with the regulations or in accordance with reasonable and generally accepted practices. In this case, the activities in question are clearly in violation of the Regulations and, moreover, they are not reasonable or generally accepted practices, as the the National Farm Animal Care Council (“NFACC”) Code of Practice for the Care and Handling of Equines mandates compliance with the Regulations.

Horses collapsed and suffered during the flight to Japan

Further issues with this shipment arose during the flight. According to the in-flight checklist, one horse went down between Alaska and Japan at approximately 2:30pm AKDT (4:30pm MT). As is the usual practice on these flights, the attendant provided no care to this animal. Though the attendant’s notes indicate their intent to check on the collapsed horse every 30 minutes, the next in-flight inspection entry was at 3:45pm AKDT (5:45pm MT) and indicated that the horse was still down. The next inspection entry was not until after landing in Japan at 9:08am JST on April 15, 2025 (6:08pm MT on April 14, 2025). That entry indicated the following: “4 horses down on landing. Pilot error hit brakes extremely hard upon landing.”

The horse that went down in flight was seemingly left there to suffer for approximately 2 hours. We do not know what happened to the horses that went down during landing, how long it took them to get up, or what, if anything, was done to prevent their unnecessary suffering. Based on Government of Japan records from past flights, the horses were likely either forced to stand or removed from the aircraft via forklift if they were unable to.

The exporter’s records suggest that the horses arrived at a quarantine facility and were back on food, water, and rest approximately 5 hours after landing in Kitakyushu (at 10:55pm MT on April 14, 2025).

Horses were unlawfully denied food, water, and rest for over 28 hours

In addition to the above-mentioned violations, according to the exporter’s own estimate, as set out in the transport itinerary for this flight, the horses were in transport without food, water, and rest for approximately 29 hours. This is a clear violation of s. 152.2(1)(c) of the Health of Animals Regulations that prescribes that horses can be transported for a maximum of 28 hours without food, water, and rest. This 28 hour maximum is already extremely long and out of step with generally recognized best practices of capping horses’ transport at 12 hours.

Travel is an especially difficult and stressful process for these draft horses – animals that are not trained or conditioned for transportation, and whose biology makes them ill-suited for transportation, causing them to be prone to dehydration, injury, and fatigue. Forcing them to endure a journey in excess of the legal maximum time without food, water, and rest would have almost certainly contributed to additional and unnecessary suffering. In its Code of Practice for the Care and Handling of Equines, NFACC itself notes that transport can predispose horses to colic and respiratory diseases due to stress caused by changes in surroundings, physical constraint, and deprivation of feed and water.

Horse export for slaughter industry regularly violates the law

The legal violations outlined above are particularly concerning because they are not a one-time occurrence. Those responsible for the shipment of horses have demonstrated a continued pattern of non-compliance with the Regulations. This pattern of non-compliance was documented in Animal Justice's two reports released last year which showed that (a) most shipments of horses exported for slaughter exceed the 28 hour legal maximum for transport without food, water, and rest;¹ and (b) horses regularly suffer injuries, illness, and even death during transport and in the hours and days following but these injuries, illnesses, and deaths are not reflected in exporters' records as required by law.²

Even after these two reports last year, the pattern of non-compliance appears to continue. For instance, a shipment of horses from Edmonton to Japan on February 2-3, 2025 was delayed due to equipment failure as a result of extreme cold temperatures reaching -30 degrees celsius. The hydraulic lift that moves the crates into the aircraft caused a delay of 3 hours, and the resulting FWR was 28.17, exceeding the maximum allowable time limit. This delay occurred in dangerously cold winter conditions and the inspector's report indicates that the horses had frost on their backs. Likewise, a shipment of horses on November 24-25, 2024 significantly exceeded the 28 hour limit by almost 2 hours, with a FWR of 29.35.

Footage obtained by Animal Justice in December 2024 and shared with the CFIA and provincial authorities in Manitoba shows that horses exported for slaughter from that province were transported from Swan River, Manitoba to a new feedlot in the dead of night before export to Japan the next day. The horses were unloaded at the new fenced in feedlot in the dark contrary to the industry's own standards set out in the NFACC code of practice, and one horse was pinned under a fence for an unknown amount of time at that feedlot. The footage shows that the horse struggled to free themselves and appears to have received no care for their physical injuries or stress before being sent to the Winnipeg airport and flown to Japan during a lengthy transport process that took at least 27 hours and 45 minutes (excluding the approximately 5

¹ <https://animaljustice.ca/exposes/inside-canadian-horses-journey-to-japan>

² <https://animaljustice.ca/blog/21-horses-killed-in-shipments>

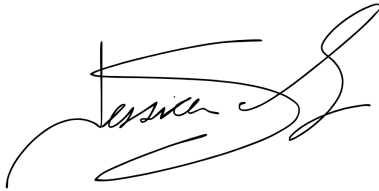
hours that the horses were in transport the night before as they were trucked from Swan River to the new feedlot closer to Winnipeg).³

Finally, horses exported to Japan for slaughter continue to be doused directly with harsh disinfectant chemicals as they arrive at quarantine facilities. Desperate and dehydrated, many horses attempt to lick this harsh liquid off of the trucks. This practice would be illegal if done in Canada and causes already stressed and exhausted horses to endure further suffering as their eyes, skin, and airways are irritated, likely causing pain and burning. Canada's horse exporters should not be allowed to send horses to countries where they will be subject to cruel practices that are illegal in this country.

We ask that you investigate and take enforcement action in relation to this April 2025 shipment to uphold the law and hold those responsible to account. Despite years of repeated non-compliance with the Health of Animals Act and Regulations, it appears that no enforcement action has been taken against any exporters of horses for slaughter, leaving the industry to continue with shipments that put horses at risk without any accountability for the unlawful suffering caused to these animals.

Thank you in advance for your attention to this serious matter.

Yours truly,

A handwritten signature in black ink, appearing to read 'Jessica Schwarz', with a stylized flourish extending from the end.

Jessica Schwarz
Staff lawyer, Animal Justice
Email: jschwarz@animaljustice.ca
Phone: 778-318-7527

On behalf of: Animal Justice and the Canadian Horse Defence Coalition

³ This information is set out in the enclosed complaint sent to CFIA officials in Manitoba. Footage of the horse pinned under a fence prior to export is available online:
https://www.instagram.com/animaljustice_/reel/DG_cnXdpbkB/?locale=fr_FR&hl=es-la