



Horsemeat production in Mexico

1. Introduction

Mexico is presently the second largest horsemeat producer in the world, surpassed only by China. According to FAO data, 83,350 tonnes of horse flesh were produced in Mexico in 2011; around 17% of this meat was exported to other countries around the globe. The Russian Federation, the Netherlands, Belgium and France are currently the biggest importers.

Although Mexico is one of the biggest exporters of horsemeat globally, the statistics suggest that the majority of horsemeat produced is consumed domestically. Nonetheless, it is claimed that the practice of eating horsemeat is not widely accepted in Mexico, primarily because horses are generally considered to be companions, sporting or working animals. Indeed, one Mexican source suggests that the majority of equine meat derives from animals that are injured or old and 'is destined to feed dogs or carnivorous animals at zoos'.¹

Table 1: Exports of Mexican horsemeat by quantity (tonnes) and value (1000 USD), 2006-2011

	2006		2007		2008		2009		2010		2011	
	Tonnes	1000 US\$	Tonnes	1000 US\$	Tonnes	1000 US\$	Tonnes	1000 US\$	Tonnes	1000 US\$	Tonnes	1000 US\$
Belgium	467	1,609	2,981	13,158	4,370	16,664	4,179	14,653	3,708	12,574	3,416	12,184
Bulgaria	:	:	:	:	:	:	81	114	:	:	:	:
Finland	:	:	101	171	:	:	:	:	:	:	:	:
France	11	42	682	3,658	958	5,660	1,118	5,624	1,275	4,231	1,241	4,087
Germany	:	:	:	:	31	275	:	:	:	:	:	:
Italy	:	:	:	:	:	:	:	:	1	8	:	:
Netherlands	839	2,414	1,547	5,055	2,094	7,572	2,354	7,746	3,197	10,970	3,573	12,830
Sweden	:	:	:	:	25	242	:	:	47	265	6	41
UK	:	:	:	:	:	:	:	:	:	:	355	928
EU Total	1,317	4,065	5,311	22,042	7,478	30,413	7,732	28,137	8,228	28,048	8,591	30,070
Switzerland	106	551	66	462	54	337	286	1,613	340	1,850	493	3,101
Russian Federation	:	:	:	:	:	:	66	166	1,335	3,302	4,102	12,757
Kazakhstan	:	:	:	:	50	96	:	:	:	:	:	:
Japan	84	134	241	502	146	360	204	456	214	476	414	888
Republic of Korea	:	:	:	:	:	:	:	:	37	51	:	:
China, Hong Kong SAR	:	:	:	:	:	:	83	163	28	52	:	:
China, mainland	:	:	:	:	:	:	22	43	:	:	24	25
China	:	:	:	:	:	:	105	206	28	52	24	25
Vietnam	:	:	:	:	:	:	19	15	47	73	93	119
Swaziland	:	:	:	:	104	975	474	3,063	432	2,980	247	1,756
Zimbabwe	:	:	:	:	:	:	3	26	:	:	:	:
USA	:	:	:	:	23	154	6	52	87	259	62	225
World Total incl. EU	1,507	4,750	5,618	23,006	7,855	32,335	8,895	33,734	10,748	37,091	14,026	48,941

Source: FAOSTAT database - Detailed trade matrix, accessed 15th September 2014

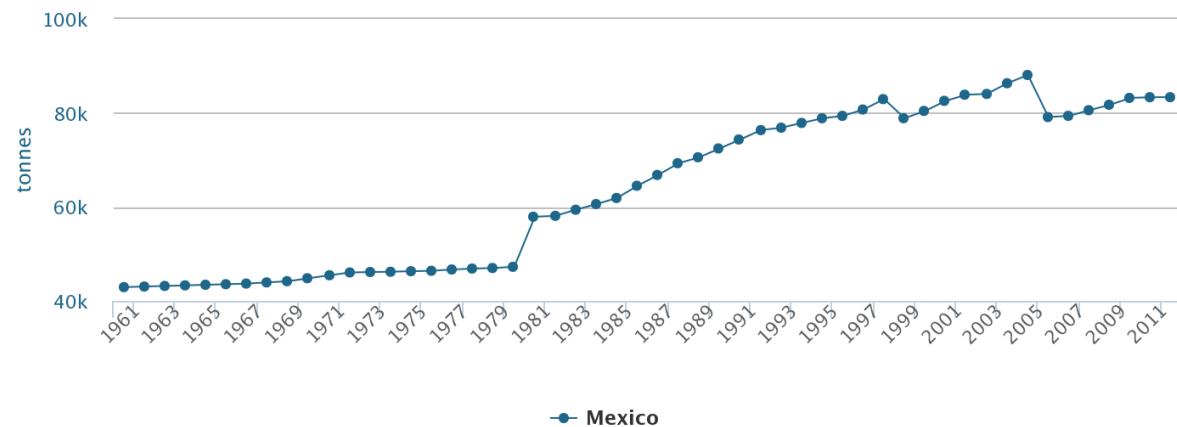
¹ Gonzáles, H.G. *et al* (2006) Horse meat for human consumption in Mexico: Slaughter performance and carcass morphometry. *Journal of Food Technology*. 4 (2): 106-110. p.106.



FAO production statistics, however, would seem to belie this statement. It seems unlikely that the majority of Mexican produced horsemeat is for non-human consumption. One possibility is that the horsemeat may be being processed into other meat products (either labelled or unlabelled), but this hypothesis and the market for horsemeat in Mexico more generally requires further investigation.

What is certain is that, as illustrated below, horsemeat production in Mexico has risen significantly since 1980; it increases fairly steadily up until 2005 when it starts to fall. The increase in horsemeat production from 2007 onwards can be largely explained by the significant rise in the number of US horses exported to Mexico for slaughter. This increase in horse imports is primarily the result of the closure of the last remaining horse slaughterhouses in the United States following the US Congress' withdrawal of funding for USDA inspections of horse slaughter plants² and various court rulings.³

Figure 1: Volume of horsemeat production in Mexico, 1961-2012



M = Million, k = Thousand

Source: FAOSTAT database – Production, accessed 15th September 2014

There are presently four slaughter plants in Mexico that are approved for the slaughter of horses for export to the EU (with the exclusion of offal). Two of these abattoirs are located in the Zacatecas region in Jerez and Fresnillo; the others are found in Aguascalientes (Aguascalientes region) and Camargo (Chihuahua region).⁴

The Empacadora De Carnes Unidad Ganadera slaughterhouse in Aguascalientes is linked to the Belgian company Chevideco, while the Empacadora De Carnes De Fresnillo slaughter plant is linked to another firm in Belgium called Multimeat BV.⁵ The third slaughterhouse, Cárnicos de Jerez, is linked to the Dutch firm Visser & Van Walsum BV, which markets Mexican horsemeat in Europe under the Javimex brand.⁶ Whether the fourth plant, Empacadora Y Ganadera De

² Becker, G.S. (2010) Horse slaughter prevention bills and issues. Congressional Research Service Report.

<http://www.nationalaglawcenter.org/assets/crs/RS21842.pdf>

³ See *Cavel Int'l, Inc. v. Madigan*, 500 F.3d 551 (7th Cir. 2007); *Empacadora de Carnes de Fresnillo v. Curry*, 476 F.3d 326 (5th Cir. 2007); *The Humane Society of the United States v. Johanns*, 520 F.Supp.2d 8 (D.D.C. 2007).

⁴ European Commission, Third country establishments, Meat of domestic ungulates, Mexico.

https://webgate.ec.europa.eu/sanco/traces/output/MX/RM_MX_en.pdf

⁵ GAIA (2010) Van Zuid-Amerikaans paard tot Belgische steak: Brazilië en Mexico <http://www.gaia.be/nl/gaia-bibliotheek/rapport/van-paard-tot-steak-brazili-en-mexico>.

⁶ <http://www.visservanwalsum.com/info-en/9/origin>



Camargo, has any direct connection with European business interests is not certain. However, bills of lading recorded in US Customs Import Data confirm that it supplies the Belgian meat company Velda NV.⁷

2. Animal welfare concerns

In Mexico, there is a national norm (*Normas Oficiales Mexicanas*) to regulate animal welfare at slaughter (NOM-033-ZOO-1995). This norm defines requirements for the welfare of animals at stunning and is deemed to be equivalent to the standards set down in EU legislation.⁸ There are additional national norms to regulate animal welfare during transport (NOM-024-ZOO-1995 and NOM-051-ZOO-1995).⁹

Recent investigations into the Mexican horse slaughter industry have raised serious animal welfare concerns. The present briefing focuses exclusively on equine welfare during transport and slaughter in Mexico itself, but it should be noted that there are also significant welfare problems associated with the long-distance transports of horses to collection centres in the United States and the conditions at feedlots prior to transportation of US horses to Mexico for slaughter.

In 2010, the Belgian animal protection organisation GAIA carried out an undercover investigation into the Mexican horse slaughter industry, specifically examining conditions at an animal market in San Bernabé and the transport of animals to slaughter. The GAIA investigation states that, according to the Mexican national norms, animals that are too weak, sick or injured must not be transported. Those responsible for loading and transporting animals must ensure that the animals are not stressed and after a transport of maximum 18 hours, the animals must also be fed and watered and have a right to an 8 hour rest period.¹⁰

The GAIA investigation recorded horses being transported using 'double-decker' trucks, which are prohibited for use for equines given that they cannot stand up properly in them and frequently result in facial injuries.¹¹

In August 2013, an investigation carried out by a coalition of animal protection groups confirmed GAIA's findings and showed no sign of improvement with unfit horses still being transported in unsuitable vehicles.¹²

At the San Bernabé market, the GAIA investigators recorded injured horses with open wounds being loaded into trailers. This was done without the use of a proper loading ramp, which meant that the animals were forced to jump into the trailers. Horses were reportedly treated in a brutal manner being crammed together into open-roofed trailers with no protection from the sun.

⁷ Examples of bills of lading and customs declarations <http://portexaminer.com/trade-data/empacadora-y-ganadera-de>; <http://portexaminer.com/trade-data/empacadora-y-ganadera-de-camargo-nv-velda/hlcume3130800303/>
Accessed 3rd October 2014.

⁸ European Commission (2008) Final report of a mission carried out in Mexico from 04 September to 11 September 2008 in order to evaluate public health control systems and certification procedures over production of horse meat intended for export to the EU. DG(SANCO) 2008-7979 – MR-FINAL. p.7.

⁹ Ibid. p. 9.

¹⁰ GAIA (2011) Van paard tot steak: Brazilië en Mexico. <http://www.gaia.be/nl/gaia-bibliotheek/rapport/van-paard-tot-steak-brazili-en-mexico>

¹¹ Ibid. p. 8.

¹² TSB Zürich et al. (2014) Summary Mexico & USA. http://animal-welfare-foundation.org/fileadmin/DAT/EIEN/awf/Download/EU_Kampagne_Horsemeat/Summaries/EU-Summary_of_investigations_in_Mexico_USA.pdf



HUMANE SOCIETY INTERNATIONAL

According to their informants, most of these horses were destined for slaughter in local abattoirs, but some were also sent from the market to the EU approved slaughter plant in Jerez.¹³

Audits carried out by the European Commission's Food and Veterinary Office have also raised concerns about animal welfare at the time of slaughter in Mexican EU approved slaughterhouses. In 2008, an FVO audit found that most of the horses seen at lairage at one slaughter plant were emaciated and noted that there was an abnormal death rate (10-20 per month, 1.5% of incoming animals). Nonetheless, no investigations or corrective actions were taken.¹⁴ The auditors also state that 'official controls performed during *ante-mortem* examinations are not sufficient to ensure that EU animal welfare requirements are met', contrary to statements made in export certificates.¹⁵ In their recommendations, the FVO auditors call on the competent authorities to ensure that live animals at the slaughter establishments are treated in accordance with EU legislation.¹⁶

A second audit carried out in 2010 found that the animal welfare situation for horses at Mexican slaughter plants had generally not improved and that the action plan that the Mexican authorities had drawn up in response to the recommendations in the 2008 report were unsatisfactory.¹⁷ Auditors noted that they witnessed a horse in a holding pen, which had its forelegs tied together with rope. They were informed that this was normal practice in Mexico to prevent horses from being able to wander while grazing. Despite these findings, the auditors concluded that controls on animal welfare had improved.¹⁸

It should, however, be noted that FVO inspections are announced and the slaughterhouses are notified in advance that such audits will take place. This is perhaps why in 2010 another FVO audit concluded positively that "in all slaughterhouses visited the animals were handled with care during unloading, resting and before slaughter"¹⁹ Unannounced, undercover investigations of the same establishments would seem to suggest that conditions are still far from ideal.

In September 2012, Animals' Angels carried out an investigation into two of the Mexican horse slaughter plants in Camargo and Aguascalientes, which are approved for export to the European Union.²⁰ This report raised concerns about the compliance of these slaughterhouses with the relevant EU legislation, namely Council Directive 93/119/EC on the protection of animals at the time of slaughter.

¹³ Ibid. p. 8.

¹⁴ European Commission (2008) Final report of a mission carried out in Mexico from 04 September to 11 September 2008 in order to evaluate public health control systems and certification procedures over production of horse meat intended for export to the EU. DG(SANCO) 2008-7979 – MR-FINAL. p.14.

¹⁵ Ibid. p. 18.

¹⁶ Ibid. p. 19.

¹⁷ European Commission, Health and Consumers Directorate-General (2011) Final report of a mission carried out in Mexico from 22 November to 03 December 2010 in order to evaluate the operation of controls over the production of fresh horse meat and meat products intended for export to the European Union as well as certification procedures. DG(SANCO) 2010-8524 – MR FINAL. p.12.

¹⁸ Ibid. p. 12.

¹⁹ European Commission (2012) Final report of an audit carried out in Mexico from 29 May to 08 June 2012 in order to evaluate the operation of controls over the production of fresh horse meat and meat products intended for export to the European Union as well as certification procedures. DG (SANCO) 2012-6340-MR FINAL. Page. 15.

²⁰ Animals' Angels (2012) Investigation of Mexican horse slaughter plants approved for export to the European Union.



Animals' Angels investigators found that the slaughter plants were failing to ensure that the horses were spared 'avoidable excitement, pain or suffering', as stipulated in Article 3 of the EU slaughter directive. For example, they observed horses falling on slippery floors and sustaining injuries when attempting to escape over a chute wall in panic.²¹ Furthermore, they also noted that horses at both plants investigated did not have drinking water available to them at all times as required by the EU requirements.²² These findings indicate that the welfare of horses at these EU approved slaughter plants still leave much to be desired.

It should also be noted that the above relates only to the conditions for animals slaughtered for export; additional data is required on the animal welfare conditions for horses that are slaughtered at local abattoirs for domestic consumption. There are, however, indications that there are serious welfare problems there. In 2008, a newspaper investigation exposé revealed that the 'puntilla knife' was routinely used on horses in Mexican plants. Footage reportedly showed horses being repeatedly stabbed in the neck prior to slaughter. This paralyses the animal, but does not stun it. Consequently, the horse is still conscious at the start of the slaughter process when it is hung by its hind leg and has its throat cut.²³

3. Traceability, consumer safety and drug residues

There have been concerns about the safety of horsemeat produced in Mexico for over a decade, particularly with respect to the traceability of horses and veterinary drug residues. This is evidenced by a series of audit reports from the European Commission's Food and Veterinary Office (FVO). As the main recipients of Mexican horsemeat exports, the EU has attempted to effectuate change in the industry, at least with respect to the horses that are sent for slaughter in EU approved slaughter plants.

In 2001, FVO auditors observed that the traceability of horses to the farm of origin was impossible.²⁴ Another FVO audit in 2005 noted that not all of the hormonal substances authorised for use in horses in Mexico were actually being tested for by the competent authorities. Hormonal substances and beta-agonists for growth promotion (except diethylstilbestrol and clenbuterol) were also allowed for use as growth promoters in food animals; these drugs are strictly prohibited for use in food animals in the EU. Given that there was no split production system to separate horses intended for slaughter for export, the FVO concluded that Mexican horsemeat did not meet the requirement for export to the EU.²⁵ Imports to the EU, however, continued unabated. Indeed, both the volume and value of these exports continued to increase significantly until 2010.

Given the problems associated with Mexican horsemeat, the European Commission adopted Decision 2006/27/EC, which laid down special conditions for horsemeat products imported

²¹ Ibid. pp. 12-13.

²² Ibid. p. 14.

²³ Veterinarians for Equine Welfare (2008) White paper on horse slaughter: its ethical impact and subsequent response of the veterinary profession. http://www.vetsforequinewelfare.org/white_paper.php Accessed 3rd October 2014.

²⁴ European Commission (2001) Final report of a mission carried out in Mexico from 12-23 November 2001 in order to review the animal health situation and to evaluate the performance of the competent authorities in controlling the production of red meat and meat products intended for export to the European Union. DG(SANCO) 3366/2001 - MR Final.

²⁵ European Commission (2005) Final report of a mission carried out in Mexico from 7 to 15 September 2005 concerning the evaluation of the control of residues and contaminants in live animals and animal products, including controls on veterinary medicinal products. DG(SANCO) 7713/2005 - MR Final.



**HUMANE SOCIETY
INTERNATIONAL**

from Mexico. Under the terms of this Decision, EU Member States are required to submit quarterly reports on the analytical results of official controls on consignments of horsemeat and horsemeat products imported from Mexico. These controls require testing for the presences of certain substances having a hormonal action and beta-agonists used for growth promotion purposes.²⁶ While samples from every consignment of horsemeat imported from Mexico are tested for these drugs, there are still a whole host of veterinary medicinal products administered to horses that are also banned for use in food animals, but are not included in this testing regime.

A third FVO audit in 2008 echoes earlier concerns about the fact that hormones and beta-agonists were still authorised for growth promotion in horses and that with the lack of a functioning split production system Mexico was still not compliant with EU requirements. This audit also identified weak control systems on the use of veterinary medicines and a lack of both follow-up procedures and infringement procedures when drug residues were detected under the national residue control plan.²⁷

Following the problems consistently identified in Mexico, as well as other non-EU countries exporting horsemeat to the EU (in particular, Canada, Argentina, and Brazil) the European Commission decided to introduce stricter import criteria for products of animal origin.

Since 31st July 2010, the EU has required that only horses with a known lifetime medical treatment history, and whose medicinal treatment records show they satisfy the veterinary medicine withdrawal periods, will be allowed to be slaughtered for export to the EU. Consequently, any non-EU country wishing to continue exporting horsemeat to the Union has been required to introduce appropriate residue control plans and to adopt new rules with respect to the identification of horses for slaughter.

The next FVO audit was carried out in Mexico in late 2010, several months after the entry into force of the new import requirements. Auditors found that the Mexican authorities had introduced measures with respect to the registration and identification of domestic horses. All holdings for breeding and fattening horses, including collection centres, were now registered in a national database operated by the *Sistema Nacional de Identificacion Individual del Ganado*. Only horses from registered holdings can be slaughtered for export to the EU.²⁸

In addition, the Mexican authorities stated that domestically produced horses eligible for export would be 'identified by microchip no more than 10 days prior to slaughter'; these are then removed from carcasses and eventually destroyed. These horses, however, can only be traced back to their last holding of origin, leading the FVO auditors to conclude that this undermined the reliability of information over the entire chain.²⁹

²⁶ Commission Decision 2006/27/EC on special conditions governing meat and meat products of equidae imported from Mexico and intended for human consumption

²⁷ European Commission (2008) Final report of a mission carried out in Mexico from 13 February to 21 February 2008 in order to evaluate the control of residues and contaminants in live animals and animal products, including controls on veterinary medicinal products. DG(SANCO) 2008-7772 - MR FINAL.

²⁸ European Commission, Health and Consumers Directorate-General (2011) Final report of a mission carried out in Mexico from 22 November to 03 December 2010 in order to evaluate the operation of controls over the production of fresh horse meat and meat products intended for export to the European Union as well as certification procedures. DG(SANCO) 2010-8524 - MR FINAL. p.8

²⁹ Ibid. pp. 8-9.



HUMANE SOCIETY INTERNATIONAL

Treatment records for domestic horses are also supposed to be included in vendor declarations or horse passports; it is noted that the latter could be used to identify more than one animal. These passports also include a signed affidavit with regard to veterinary medical treatments that referred to substances listed in an already defunct piece of EU legislation and made no reference to the six month withdrawal period for other veterinary drugs. Auditors also state that the competent authorities “do not verify authenticity or reliability of the sworn statement on veterinary medical treatments made by owners, even with the presence of positive results for residues.” They further note that various samples for substances banned for use in food animals in the EU, namely clenbuterol, zilpaterol, ractopamine, furanics [nitrofurazone] and cortisone, had been found in the meat of horses covered by the sworn statement.³⁰

As noted above, it is not just domestically produced horses that are slaughtered in Mexico. Each year, thousands of US horses are also imported there for slaughter enduring long-distance transports in the process. These animals are identified by microchip on a voluntary basis at US collection centres with this information being included in an export certificate issued by the US Department of Agriculture (USDA). In addition, a green label is affixed to the horse’s skin with the USDA identification number.³¹

The Mexican authorities have introduced a system of official border controls for imported horses. Horses are physically inspected on US territory and some horses deemed unfit for slaughter due to injury, health problems or advanced pregnancy are rejected. Auditors state that between January and October 2010, ‘5,336 live horses in 631 consignments were rejected out of 62,560 animals presented for import’.³² This represents 8.5% of all US horses during this period that were destined for slaughter in Mexico.

After these border checks, the horses are given certificates for internal movement to the specific slaughterhouse listed on it. However, the FVO audit notes that these certificates refer only to the total number of horses, rather than their individual identification making it impossible to ascertain exactly which animals are still in the consignment. Once the trucks are sealed by the border inspection officials, this seal may only be broken when the US horses arrive at their final destination.³³

The medical treatment records for these US horses are a key issue. Horses in the US are not born and raised to be food producing animals. Consequently, a wide range of veterinary medical products are routinely administered to horses, which are banned for use in food animals. Some substances, such as the NSAID phenylbutazone, for which there is no established maximum residue limit are almost ubiquitously used in horses in the US. Crucially, there is also no mandatory requirement for horse owners to keep lifetime medical treatment records for their animals. This is particularly problematic when they are sold to new owners. The majority of US horses that are sent for slaughter across the border have actually been sold at auction and bought up by dealers, known colloquially as ‘kill buyers’, who are explicitly buying the animals to have them slaughtered for profit.

In order to meet EU requirements, Mexican import requirements for live horses for slaughter now require that horse owners sign sworn statements to declare the substances that have been

³⁰ Ibid. p. 9.

³¹ Ibid. p. 6.

³² Ibid. p. 7.

³³ Ibid. p. 7.



HUMANE SOCIETY INTERNATIONAL

administered to the animals. These are completed by the vendors, who, in the case of kill buyers, will only have had the horses in their possession for a limited space of time and will not have knowledge of the veterinary medical products given to them during both the past six months, nor throughout their lifetimes. No medical history records are exchanged at auction. The FVO auditors state that the USDA does not take any responsibility for the authenticity of the affidavit, nor does it take any responsibility for the origin of the animals or controls over the US assembly centres.³⁴

A follow-up FVO audit conducted in Mexico in 2012 found that “the procedure as regards the identification and control of imported horses from the US has not changed significantly compared to the procedure in place during the audit 2010-8524.”³⁵ The report restated that there was no evidence that the USDA takes any responsibility with regard to the origin of the animals, controls over the US assembly centres or the reliability of the sworn statements on the medical treatments of animals. The audit concluded that “the systems in place for identification, the food chain information and in particular the affidavits concerning the non-treatment with certain medical substances, both for the horses imported from the US as well as for the Mexican horses are presently insufficient to guarantee that standards equivalent to those provided for by EU legislation are applied.”³⁶

Further to this, the Mexican authorities “informed the FVO audit team that their legal Service had informed them that the Mexican CAs [competent authorities] are not allowed to question the authenticity or reliability of the sworn statements (affidavits) made by owners of imported horse from the US on veterinary medical treatments.”³⁷ Echoing this, the Animals’ Angels’ 2012 investigation into Mexican horse slaughterhouses approved for export to the EU, which tracked shipments of live horses from border posts also found that ‘the paperwork used to identify the horses in the individual shipment is falsified and not reliable’.³⁸

These findings should be of great concern to EU officials because 80% of the eligible horses slaughtered in Mexico for the production of meat to be exported to the EU is derived from horses imported from the US.³⁹ In spite of these findings, according to EU official statistics, some 5,480,900 kilos of equine meat valued at € 18,097,804 was imported from Mexico to Belgium and France in 2013 alone.⁴⁰

The next FVO audit concerning equine meat from Mexico is scheduled to take place in 2014.⁴¹

³⁴ Ibid. p. 9.

³⁵ European Commission (2012) Final report of an audit carried out in Mexico from 29 May to 08 June 2012 in order to evaluate the operation of controls over the production of fresh horse meat and meat products intended for export to the European Union as well as certification procedures. DG (SANCO) 2012-6340-MR FINAL. Page 7.

³⁶ Ibid. p. 6.

³⁷ Ibid p. 8.

³⁸ Animals’ Angels (2012) Investigation of Mexican horse slaughter plants approved for export to the European Union p. 14.

³⁹ Final report of an audit carried out in Mexico from 229 May to 08 June 2012 in order to evaluate the operation of controls over the production of fresh horse meat and meat products intended for export to the European Union as well as certification procedures. DG (SANCO) 2012-6340-MR FINAL. p. 7.

⁴⁰ Eurostat database, EU Trade Since 1988 by HS2, 4, 6 and CN8. EU27-28 imports of meat of horses, asses, mules or hinnies, chilled or frozen (020500). Accessed 19th May 2014.

⁴¹ European Commission (2014) Food and Veterinary Office Programme of Audits 2014.

http://ec.europa.eu/food/fvo/inspectprog/prog_audit_2014_en.pdf