



## The CALIFORNIA STATE HORSEMEN'S ASSOCIATION

July 13, 1999

Regulatory Analysis and Development

PPD

APHIS

Suite 3C03

4700 River Road Unit 118

Riverdale, MD 20737-1238

Re: Docket #: 98-074-1

Title: Commercial Transportation of Equines to Slaughter

Docket Type: PRM

Publication Date: 5/19/99

CFR Part: 9 CFR 70, 88

FR Citation: 64 FR 27210

To Whom It May Concern

The membership of the California State Horsemen's Association, approximately 35,000 statewide find that we have some genuine concerns with the Commercial Transportation of Equines to Slaughter regulations, and ask that we be listed in opposition to these regulations as presently written and presented

We base our concern on the following:

- Double-deck trailers for transporting horses to slaughter will **NOT** be banned. Double-deck cattle trailers used for hauling horses to slaughter were never designed or constructed for hauling horses. Horses on the bottom decks repeatedly injure themselves on the exposed beams needed to support the top decks (tops of heads and eyes). They have little or no footing on the several ramps used within the trucks for loading into upper and lower decks, and there is no protection to keep them from falling off into lower floors while trying climb up these steep narrow ramps. These trailers also can not provide adequate head room and still stay within height requirements for states underpasses. The lowest underpasses being 14' nationwide. **(Please note-If these trailers are not acceptable in 5 years-They are not acceptable now)**
- Double-deck trailers hauling horses sway noticeably at speeds over 55 miles per hour. They can not be pulled safely onto soft shoulders of roads without the real danger of falling over. They are extremely top heavy, and can shift suddenly from the weight of the top heavy animals. They also turn over easily pose a danger to the general public on roads and highways.

- Double-deck cattle trailers do not have secure footing or safe interiors, and many injuries occur.
- It is impossible to off load an injured animal (especially from the top tier or front compartment) en route from a double-deck trailer unless special handling equipment can be located (Chutes-few and far between)
- Adequate water and rest will not be provided
- **NO** protection from cold and elements as well as ventilation is being provided.
- It will legalize the shipment of foals to slaughter, especially foals less than 600 pounds who can not withstand the journey to slaughter, nor defend themselves against mature horses attacking and falling on them in transport, as well as in holding facilities
- Will facilitate the do-it-yourself castration of yearling colts. It is cruel and inhumane to castrate a yearling, who is usually not a problem, in order to ship it to slaughter.
- Will facilitate the castration of many mature stallions. This will be done in the most cost effective manner possible, and these **NOW GELDINGS** in the eyes of the law will be transported as soon as possible still acting as stallions.
- May interfere with existing state laws and codes
- Will allow the shippers to decide what is fit to travel
- Owner-shipper certificates would be retained only for 1 year (most states now require at least two years), and no provisions are provided for law enforcement and State Brand Departments to have access to these records for the purpose of identifying and locating possible stolen and missing horses.
- Full term pregnant mare can be shipped to slaughter
- **Penalties will be civil, NOT CRIMINAL**

Thank you for your time and consideration in this manner.

Sincerely,

*Gini Richardson*

Gini Richardson  
 Legislative Chairman  
 California State Horsemen's Association