



Chairman Roberts, Vice Chairman Hinrichsen Senator Jaquez Lewis, representative Garcia and committee members thank you for taking time to hear about this important legislation. Ranching and the raising of livestock have played an essential role in Colorado history.

Throughout time, ranchers have relied on their horses to manage their herds. These equines are working animals who contribute to the continued success of the ranching community. This bill honors the service these equines provide by giving them a second chance or a dignified death when they are no longer able to serve in this capacity.

It is well known in the livestock community that many horses sold at auction are purchased to be slaughtered for human consumption. This bill will expand access to and increase market share for Colorado livestock auctions because these owners will now be able to confidently participate knowing that selling for slaughter has been prohibited. In doing so, this bill also brings additional integrity to our livestock auctions. For our lower income residents who often lack the time and means to sell their animals outside the auction system, they will no longer be forced to choose between their personal beliefs and their economic necessities.

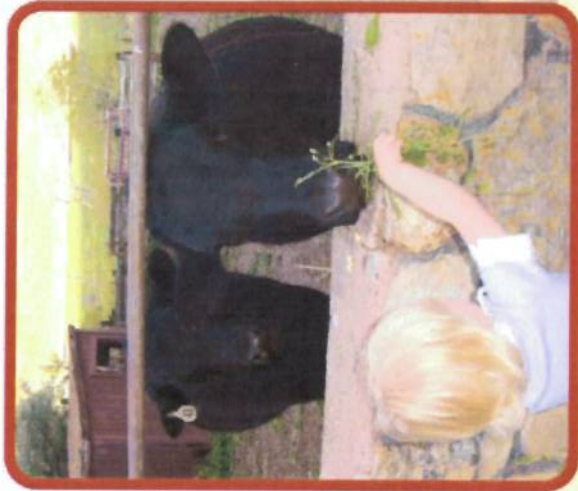
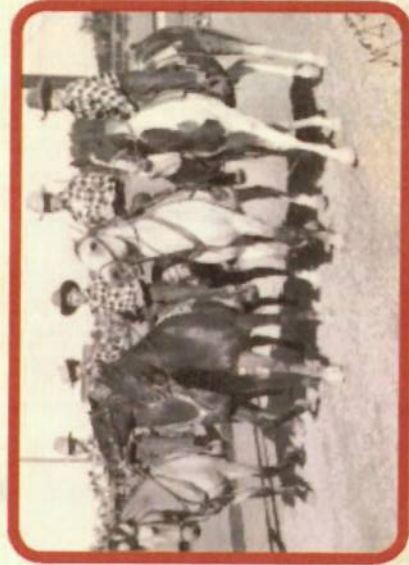
It is not safe for humans to consume horse meat. There are humane and responsible ways to thin the horse population that don't require slaughtering for food. This bill accomplishes that standard.

As a member of the ranching community and owner of three horses I have experienced first hand the benefit of giving these horses a second chance. These horses have contributed so much to their owners, and they still have much to offer. By prohibiting the slaughtered of horses for human consumption it will eliminating the practice of kill buyers, and expanding access for individuals, families, and rescues to participate on both sides of the auction process. This bill honors Colorado's ranching traditions and will help ensure their continued centrality to our shared history.

Thank you
Diane Mullins

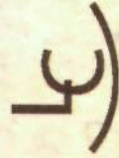
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September 8, 2020

Mr. Kevin Shea, Administrator
Animal and Plant Health Inspection Service (APHIS)
U.S. Department of Agriculture
1400 Independence Ave, SW
Washington, DC 20250

Mr. Paul Kiecker, Administrator
Food Safety and Inspection Service (FSIS)
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250-3700

Mr. Shea and Mr. Kiecker –

On behalf of the United States Cattlemen's Association's (USCA) nationwide membership of cow-calf producers, backgrounders, feedlot operators, livestock haulers, and independent processors, we write to you today with deep concern regarding reports of contaminated meat sickening Mexican citizens.

According to *Food Safety News*¹, a total of 54 people from six municipalities have fallen ill after consuming meat contaminated with Clenbuterol, a beta2-agonist used as a food additive in some livestock feed to promote muscle mass and meat yield in cattle, lamb, poultry and swine. This practice is illegal in the United States and Europe. USCA strongly recommends increased inspection protocols of all beef and cattle imported from Mexico until such a time when confidence can be restored in Mexican beef product.

A 2019 analysis² by Aaron Valencia Garcia of the Universidad Autónoma del Estado de Morelos tested 106 samples of beef muscle and beef liver from various vendors in the metro area of Cuernavaca, Morelos and found that 52 samples tested positive for Clenbuterol residue. The residue quantities exceeded the maximum limits by the Codex Alimentarius of 0.2 micrograms per kilogram for beef muscle and 0.6 micrograms per kilogram for beef liver.

¹ Food Safety News. "Suspected Clenbuterol poisonings in Mexico under investigation". August 25, 2020. https://www.foodsafetynews.com/2020/08/suspected-clenbuterol-poisonings-in-mexico-under-investigation/?fbclid=IwAR1xChrSj6it_Hn5S9N5ZwwMZgOcP6yAWXrIDMABjvOPuo3hQ8grK53WQGU

² Aaron Valencia Garcia. "Evaluación de la presencia de residuos de clenbuterol en muestras de productos cárnicos dentro del estado de morelos". December 1, 2019. <http://148.218.65.90/xmlui/handle/20.500.12055/1208>



Further, in 2016, the National Football League (NFL) was forced to issue a warning to its players about consuming too much meat while visiting Mexico or China³:

“There is evidence that meat produced in China and Mexico may be contaminated with Clenbuterol, an anabolic agent which is banned by the NFL Policy on Performance-Enhancing Substances. Consuming large quantities of meat while visiting those particular countries may result in a positive test for Clenbuterol in violation of the Policy.”

As illustrated above, Mexico unfortunately has an ongoing issue with ensuring the safety of its domestic meat product. Even more unfortunate is that most of that meat product is destined for U.S. consumers.

In 2019, Mexico sent 86% of its total beef exports - worth \$1.3 billion – to the United States, making them the third-biggest foreign beef supplier to the United States. Juan Ley, president of Mexico’s main cattle growers association, boasted in a May 13 *Reuters* report that those numbers are only going to increase in 2020, stating “I think we’re going to leap past Canada this year.”⁴

With the loophole created when mandatory country-of-origin labeling for U.S. beef products was repealed, meatpackers are now able to import foreign beef from places like Mexico and Brazil, have that product undergo a “significant transformation” within our borders, and then claim the “Product of the U.S.A.” label. This means that it is more than possible that meat contaminated with Clenbuterol can wind up in product packaged with a “U.S.A.” label and end up sickening U.S. citizens.

Allowing contained meat into our borders is unacceptable for a nation that prides itself on producing the highest quality, most sustainable, and safest beef in the world. We ask that APHIS and FSIS seriously evaluate the public health risks associated with importing beef and meat from Mexico, including conducting an equivalence verification to ensure that Mexico is still maintaining a regulatory food safety inspection system that is on par with the United States’.

Sincerely,

A handwritten signature in black ink that reads "Brooke Miller M.D." with a stylized flourish at the end.

Dr. Brooke Miller, M.D.
President, U.S. Cattlemen’s Association

³ ESPN. “Players warned too much meat abroad may lead to positive test”. May 3, 2016. https://www.espn.com/nfl/story/_/id/15454487/nfl-warns-eating-too-much-meat-mexico-china-result-positive-test

⁴ David Alire Garcia, P.J. Huffstutter. “More Mexican beef headed to U.S. dinner tables as American supply crunch bites” May 13, 2020. <https://www.reuters.com/article/us-mexico-usa-trade-beef/more-mexican-beef-headed-to-u-s-dinner-tables-as-american-supply-crunch-bites-idUSKBN22P2OK>

Following the closure of equine slaughterhouses in the United States in 2007, there began an unprecedented boom in the number of horses exported from the United States to Mexico for slaughter. From 2007 through 2014, most of this horse and equine meat produced in Mexico was exported to a total of 25 different nations in Europe, Asia, and Africa. Mexico exported a peak annual total of more than 41.2 million pounds of horse and equine meat in 2012, with a total trade value of \$67.8 million.

In December 2014, the European Commission instituted a total ban on the import of horse and equine meat from Mexico to the European Union (EU).¹ Horse meat produced in Mexico – the vast majority of which comes from horses originating in the United States – was found to fall far short of EU food safety standards, including a requirement that complete lifetime medical treatment records accompany each animal slaughtered. The European Commission also found serious welfare violations at Mexican slaughterhouses, in violation of EU ethical and safety standards.

Following the EU ban starting in 2015, total horse and equine meat exports from Mexico plummeted back to the same baseline totals experienced prior to 2007, of about only 1 million to 3 million pounds per year. Following the EU ban through 2019 (the latest year for which reliable trade data is available), Mexico has exported horse meat to only two trade partners – Japan and Vietnam.

Although horse meat exports from Mexico plummeted immediately after the ban, the number of horses sent from the U.S. to Mexico for slaughter did not. Instead, slaughter horse exports from the U.S. to Mexico remained at similar pre-ban levels, with a substantive decline only

Total Horse & Equine Meat Exports from Mexico to All Destinations

	Total Weight - Horse & Equine Meat (lbs)	Total Trade Value (\$ U.S.)	Average Trade Value per Pound (1 lb) (\$ U.S.)
2021	n/avail.	n/avail.	n/avail.
2020	n/avail.	n/avail.	n/avail.
2019	2,167,117	\$3,435,924	\$1.59
2018	1,077,936	\$2,152,501	\$2.00
2017	1,241,042	\$1,910,142	\$1.54
2016	1,964,715	\$2,882,064	\$1.47
2015	2,807,903	\$4,150,125	\$1.48
2014	13,691,854	\$22,444,527	\$1.64
2013	31,927,011	\$52,325,922	\$1.64
2012	41,229,769	\$67,813,942	\$1.64
2011	30,921,257	\$48,939,474	\$1.58
2010	23,589,546	\$36,826,480	\$1.56
2009	19,609,107	\$33,734,888	\$1.72
2008	17,314,920	\$32,336,210	\$1.87
2007	12,384,656	\$23,005,706	\$1.86
2006	3,319,926	\$4,751,019	\$1.43
2005	3,103,225	\$4,354,135	\$1.40
2004	2,996,707	\$3,276,827	\$1.09
2003	2,073,205	\$3,011,945	\$1.45
2002	2,853,175	\$3,886,926	\$1.36

Source: United Nations Statistics Division (UNSD), UN Comtrade.

1. "Mexican horse meat banned by EU," *Journal of the American Veterinary Medical Association's (JAVMA) News*, 15 February 2015, <https://www.avma.org/javma-news/2015-02-15/mexican-horse-meat-banned-eu>.

seen in 2020 and 2021. Instead of being exported, the tens of millions of pounds of horse meat produced each year in Mexico must be consumed domestically. The following table estimates the annual meat produced from horses exported from the U.S. to Mexico for slaughter. Along with total horse meat imported into Mexico from other nations (if any), the following table deducts the total amount of horse meat exported out of Mexico annually, to estimate the annual balance of horse meat that must be consumed domestically every year in Mexico. Note that the following table does not include meat from horses sourced domestically in Mexico, and that the carcass yield weight used in the calculation is fairly conservative.

Mexico - Annual Balance of Horse Meat Production, Imports, Exports, and Implied Domestic Consumption

	Horse Meat Production and Imports										Exports		Net Balance - Domestic Consumption (meat - lbs)
	Total Horses for Slaughter		Average Carcass Weight (kg)	Total Meat Production (kg)	plus Total Imports	Total Production & Imports (kg)	Less Total Exports (kg)	Net Balance - Domestic Consumption (kg)	Exports		Net Balance - Domestic Consumption (meat - lbs)		
	from U.S.	domestic (Mexico)							Total Horses	Total Exports		Total Exports	
2021	18,327	0	18,327	3,207,225	n/avail.	-	-	-	-	-	-	-	
2020	29,966	0	29,966	5,244,050	n/avail.	-	-	-	-	-	-	-	
2019	54,157	0	54,157	9,477,475	0	9,477,475	(982,989)	8,494,486			18,727,114		
2018	71,213	0	71,213	12,462,275	0	12,462,275	(488,944)	11,973,331			26,396,645		
2017	67,289	0	67,289	11,775,575	0	11,775,575	(562,928)	11,212,647			24,719,626		
2016	78,939	0	78,939	13,814,325	0	13,814,325	(891,181)	12,923,144			28,490,622		
2015	84,938	0	84,938	14,864,150	0	14,864,150	(1,273,645)	13,590,505			29,961,899		
2014	105,666	0	105,666	18,491,550	0	18,491,550	(6,210,528)	12,281,022			27,074,987		
2013	102,254	0	102,254	17,894,450	0	17,894,450	(14,481,866)	3,412,584			7,523,451		
2012	110,202	0	110,202	19,285,350	0	19,285,350	(18,701,531)	583,819			1,287,099		
2011	67,540	0	67,540	11,819,500	0	11,819,500	(14,025,663)	(2,206,163)			(4,863,751)		
2010	52,580	0	52,580	9,201,500	580,675	9,782,175	(10,700,051)	(917,876)			(2,023,568)		
2009	46,622	0	46,622	8,158,850	601,316	8,760,166	(8,894,552)	(134,386)			(296,270)		
2008	51,155	0	51,155	8,952,125	983,884	9,936,009	(7,853,925)	2,082,084			4,590,204		
2007	43,201	0	43,201	7,560,175	2,703,432	10,263,607	(5,617,592)	4,646,015			10,242,698		
2006	11,080	0	11,080	1,939,000	4,800,167	6,739,167	(1,505,895)	5,233,272			11,537,376		
2005	7,821	0	7,821	1,368,675	5,022,544	6,391,219	(1,407,601)	4,983,618			10,986,984		
2004	3,818	0	3,818	668,150	5,665,499	6,333,649	(1,359,285)	4,974,364			10,966,582		
2003	785	0	785	137,375	4,641,741	4,779,116	(940,391)	3,838,725			8,462,930		
2002	774	0	774	135,450	3,463,763	3,599,213	(1,294,180)	2,305,033			5,081,722		

Total horses imported to Mexico for slaughter from U.S. per data from: USDA Livestock, Poultry, and Grain Market News, Las Cruces, NM.
Average horse meat carcass weight an assumption per data from: González H.G., et. al., "Horse Meat for Human Consumption in México: Slaughter Performance and Carcass Morphology," *Journal of Food Technology* 4, no. 2 (2006): 106-110.
Total imports and exports of horse and equine meat to and from Mexico, by nation, per data from: United Nations Statistics Division (UNSD), UN Comtrade.

There exists very little information about what the actual end uses are of the horse meat produced in Mexico. Some may be used in dog food, or as bait or feed for zoo animals. But it appears that most of the tens of millions of pounds of horse meat produced in Mexico annually is ultimately destined for human consumption. By and large, the overt marketing, sale, and consumption of horse meat by humans is no more prevalent, mainstream, or culturally acceptable in Mexico than it is in the United States. The attitudes toward human consumption of horse meat in Mexico appear to be similar to those held by the U.S. population. Thus, most of the horse meat consumed in Mexico appears to be the result of meat products being fraudulently substituted with unlabeled horse meat at some point in the supply chain.²

The motive to fraudulently substitute horse and equine meat is plainly economic – the average export value of Mexican horse meat was only \$1.59 per pound in 2019, and ranged from only \$1.00 to \$2.00 per pound in the prior twenty years. Thus, substituting even just 5% of a meat product with horse can result in a meaningful enhancement of the product's profit margin. For producers of horse meat, it is much more valuable as a fraudulent meat substitute than it would be selling it at the market price of horse meat.

A study published in 2020, conducted by researchers at the National Autonomous University of Mexico and the Sonora Institute of Technology, found a shockingly high prevalence of unlabeled horse meat in the consumer meat supply in Mexico – on average, horse meat DNA was found in 10% of all meat labeled or sold as beef in the supermarkets, butcher shops, city markets, street vendors, and loncherias (economic kitchens) of eight different major cities in Mexico. Horse meat was found marketed as beef in seven out of the eight major cities that were studied – including Mexico City, Chihuahua City, and Aguascalientes. Horse meat was found marketed as beef both in cities with horse slaughtering facilities, and cities without them. As shown in the table to the right, 12.5% of meat sold as beef in Mexico City tested positive for horse meat DNA. The prevalence in Chihuahua City was 11.3%, and 10.8% in Aguascalientes. In addition to

% of Meat Sold as Beef in Mexican Cities Testing Positive for Horse Meat

	population (2016)	total samples	positive samples	% samples positive for horse meat
Mexico City	8.9 million	96	12	12.5%
Aguascalientes*	1.0 million	74	8	10.8%
Chihuahua*	970,000	133	15	11.3%
Pachuca	580,000	34	4	11.8%
Zacatecas*	340,000	56	4	7.1%
San Vicente Chicoloapan*	200,000	40	0	0.0%
Total Sampled:		433	43	9.9%

*City with government-inspected horse slaughtering plant(s).
Meat sold in butcher shops, supermarkets, city markets, street vendors, and loncherias (economic kitchens) - labeled/sold as beef.

Data per: M. S. Rubio Lozano, J.F. Hernández Chávez, F.A. Ruiz López, R. Medina Medina, E. Delgado Suárez, R.D. Méndez Medina, T.M. Ngapo, "Horse meat sold as beef and consequent clenbuterol residues in the unregulated Mexican marketplace," *Food Control* 110 (2020): Article 107028.

2. Laura X. Estévez-Moreno and Genaro C. Miranda-de la Lama, "Meat consumption and consumer attitudes in México: Can persistence lead to change," *Meat Science* No. 193 (2022): Article 108943.

the 433 samples taken from establishments not marketing any horse, the study did encounter five establishments openly selling labeled horse meat, though the prevalence of establishments selling unlabeled horse meat was greater by almost ninefold. The researchers interviewed the staff of two horse slaughterhouses in Mexico, who indicated they fully understood that most of the meat they supplied to domestic vendors would not be sold to the final consumer as horse meat explicitly. The staff of those slaughterhouses indicated that domestic demand for horse meat is the highest during periods when slaughter weights are impacted by a scarcity of food for the livestock, like during the winter or the dry season.³

The extraordinary prevalence of fraudulent unlabeled horse in the Mexican consumer market would suggest that this is a phenomenon with deep roots and experienced players. Prior to the boom in Mexican horse meat exports starting in 2007, over 10 million pounds of horse meat per year was already going to domestic consumption in Mexico. Through 2007, millions of pounds of the horse meat produced in the United States was actually exported to Mexico. A portion of the horse meat produced annually in Canada was also exported to Mexico through 2010. Adulterated meat products containing horse meat were also discovered in Mexico in a study published over twenty years ago, in 2000. [Horse meat found in about one-third of all sausage and prepared hamburger patties sampled in Mexico] - **[NEED TO PURCHASE JOURNAL ARTICLE: M.E. Flores-Munguia, M.C. Bermudez-Almada, L. Vázquez-Moreno, "A research note: Detection of adulteration in processed traditional meat products," Journal of Muscle Foods 11, No. 4 (2000): pp. 319-325. <https://onlinelibrary.wiley.com/doi/10.1111/j.1745-4573.2000.tb000435.x>]**

Are U.S. horses sent to slaughter in Mexico ending up in the U.S. food supply as unlabeled horse meat?

Study efforts of the integrity of meat products in the U.S. have been surprisingly sparse. A study published in 2016 by researchers from Chapman University found two out of 48 ground meat samples purchased from stores and online retailers in the United States tested positive for horse meat DNA.⁴ Both samples were purchased from online vendors. One was labeled ground bison with Canada as the country origin, which was found to actually be a mixture of elk, beef, pork, and horse. The other was labeled ground lamb with the USA as the country of origin,

3. M. S. Rubio Lozano, J.F. Hernández Chávez, F.A. Ruíz López, R. Medina Medina, E. Delgado Suárez, R.D. Méndez Medina, T.M. Ngapo, "Horse meat sold as beef and consequent clenbuterol residues in the unregulated Mexican marketplace," *Food Control* 110 (2020): Article 107028.

4. D.E. Kane and R.S. Hellberg, "Identification of species in ground meat products sold on the U.S. commercial market using DNA-based methods," *Food Control* 59 (2016): pp. 158-163.

which was found to be lamb with pork and horse added. The researchers who conducted this study noted that, to the best of their knowledge, the last time a similar study was conducted in the United States was in 1995.⁵

Last year, the U.S. imported a record high amount of beef and pork from Mexico – just under 779 million pounds. The U.S. is a major exporter of beef and pork, but also imports just about as much as it exports to meet domestic consumer demand. The U.S. meat industry exports a substantial amount of higher-quality beef and pork to other markets around the world, while lower-priced imports from Mexico now backfill a substantial portion of the beef and pork consumed domestically in the U.S. Just twenty years ago, less than 0.5% of all the beef and pork imported into the U.S. came from Mexico, and as recently as 1989 almost no beef and pork whatsoever was imported into the U.S. from Mexico. But starting around 2007, beef and pork imports from Mexico have grown to the point that it is now among the largest sources of meat for U.S. consumers. In 2021, the U.S. imported over 674 million pounds of beef and veal meat from Mexico, accounting for 20.2% of U.S. beef imports – as compared to just 43.7 million pounds and 1.7% of imports in 2008. Over 104 million tons of pork was imported from Mexico in 2021, comprising 8.8% of total U.S. pork imports – up from almost zero in 2001, over double what it was in 2019. During the Covid-19 pandemic and related meatpacking plant problems in the U.S., the amount of Mexican pork imports in particular skyrocketed to meet U.S. consumer demand. This is of concern because ground and processed meat products, like sausages and hot dogs, are much easier to adulterate with undeclared horse meat.

Total Beef and Pork Meat Imports to the U.S. - from Mexico

	Beef & Veal		Pork		Total	
	meat (lbs)	% total	meat (lbs)	% total	meat (lbs)	% total
2021	674,627,883	20.2%	104,071,831	8.8%	778,699,714	17.2%
2020	651,323,895	19.5%	72,770,968	8.0%	724,094,864	17.1%
2019	579,958,407	19.0%	47,179,044	5.0%	627,137,451	15.7%
2018	508,184,538	17.0%	47,473,700	4.6%	555,658,238	13.8%
2017	573,541,407	19.2%	36,804,834	3.3%	610,346,241	14.9%
2016	493,420,615	16.4%	30,948,750	2.8%	524,369,365	12.8%
2015	391,936,883	11.6%	24,419,788	2.2%	416,356,671	9.3%
2014	310,154,969	10.5%	20,679,962	2.0%	330,834,932	8.4%
2013	251,563,169	11.2%	15,755,241	1.8%	267,318,409	8.5%
2012	242,289,426	10.9%	16,878,732	2.1%	259,168,159	8.6%
2011	154,911,329	7.5%	16,580,795	2.1%	171,492,124	6.0%
2010	107,329,199	4.7%	19,591,007	2.3%	126,920,206	4.0%
2009	65,862,944	2.5%	16,245,091	1.9%	82,108,036	2.4%
2008	43,783,247	1.7%	34,196,895	4.1%	77,980,142	2.3%
2007	49,788,430	1.6%	42,783,271	4.4%	92,571,700	2.3%
2006	40,760,027	1.3%	33,231,694	3.4%	73,991,720	1.8%
2005	26,719,551	0.7%	19,604,815	1.9%	46,324,366	1.0%
2004	19,495,087	0.5%	9,455,302	0.9%	28,950,389	0.6%
2003	15,882,548	0.5%	4,093,608	0.3%	19,976,156	0.5%
2002	16,706,610	0.5%	1,410,932	0.1%	18,117,542	0.4%
2001	12,165,617	0.4%	250,129	0.0%	12,415,746	0.3%
2000	10,890,248	0.4%	38,204	0.0%	10,928,451	0.3%
1999	10,481,758	0.4%	140,986	0.0%	10,622,745	0.3%
1998	9,141,680	0.3%	450,704	0.1%	9,592,385	0.3%
1997	8,989,048	0.4%	60,389	0.0%	9,049,437	0.3%
1996	10,672,225	0.5%	34,653	0.0%	10,706,877	0.4%
1995	5,747,351	0.3%	38,974	0.0%	5,786,325	0.2%
1994	4,143,376	0.2%	2,744	0.0%	4,146,120	0.1%
1993	3,221,273	0.1%	43	0.0%	3,221,316	0.1%
1992	876,800	0.0%	6,837	0.0%	883,637	0.0%
1991	1,684,007	0.1%	14,202	0.0%	1,698,209	0.1%
1990	3,465,856	0.1%	18,069	0.0%	3,483,925	0.1%
1989	210,854	0.0%	1,451	0.0%	212,305	0.0%

Source: USDA, Economic Research Service calculations using data from U.S. Department of Commerce, Bureau of the Census.

5. Sheri Ledbetter, "Chapman University Research on Meat Species Shows Mislabeling in Commercial Products," Chapman University Press Room, 20 August 2015, <https://blogs.chapman.edu/press-room/2015/08/20/chapman-university-research-on-meat-species-shows-mislabeling-in-commercial-products/>.

In September 2020, the United States Cattlemen's Association (USCA) sent a letter to the U.S. Department of Agriculture's Animal and Plant Health Inspection Service (APHIS) and Food and Safety Inspection Service (FSIS), expressing the USCA's concern about Mexican meat imports after reports of contaminated meat sickening citizens in Mexico.⁶ The USCA's letter cites a 2019 study finding 49% of meat marketed as beef in Mexico was contaminated with clenbuterol – an anabolic agent that is prohibited in the U.S. and EU (and is also a prohibited doping agent in Olympic and professional sports).⁷ The letter was spurred by a 2020 incident where 54 people fell ill with clenbuterol poisoning in the Mexican state of Morelos from contaminated meat.⁸

Horse meat produced in Mexico – largely from horses exported from the U.S. with very little concern or control for medical history and substances – has been found to be widely contaminated with clenbuterol. This was one of the primary reasons why the EU banned Mexican horse meat. The study published in 2020 of eight Mexican cities, which found that about 10% of all meat labeled and sold as beef actually contained horse meat DNA, also found that 100% of the meat samples testing positive for horse DNA were also contaminated with clenbuterol. The presence of clenbuterol, and the presence of horse meat, are often one and the same.

The USDA, the FDA, and the Food Safety and Inspection Service (FSIS) have publicly said very little about what measures they take to ensure that meat products imported from Mexico do not contain unlabeled horse meat. When asked by NBC News during the EU horse meat scandal in 2013, the USDA stated that they were unable to produce any records whatsoever regarding species testing of meat imports over the past 30 years. Though the USDA told NBC News that it believed its labeling and inspection standards for meat imports made it unlikely that beef adulterated with horse meat was reaching U.S. consumers, NBC News reported that USDA officials privately acknowledged “that species testing for meat imported into the U.S. is performed typically only when there's a reason to question a shipment.”⁹ It is unclear what, if any, steps the USDA, FDA, and FSIS have taken following the EU's ban on Mexican horse meat, as tens of millions of pounds per year of horse meat is produced in Mexico for some sort of domestic consumption.

6. Dr. Brooke Miller, M.D., President, United States Cattlemen's Association to the Directors of APHIS and FSIS (8 September 2020), <https://northernag.net/u-s-cattlemens-concerned-about-contaminated-mexican-beef/>.

7. Aaron Valencia Garcia. “Evaluación de la presencia de residuos de clenbuterol en muestras de productos cárnicos dentro del estado de morelos” (Tesis de maestría, Universidad Autónoma del Estado de Morelos), 2019). <http://148.218.65.90/xmlui/handle/20.500.12055/1208>

8. “Suspected Clenbuterol poisonings in Mexico under investigation,” *Food Safety News*, 25 August 2020, https://www.foodsafetynews.com/2020/08/suspected-clenbuterol-poisonings-in-mexico-under-investigation/?fbclid=IwAR1xCHR5j6it_Hn5S9N5ZwwMZgOcP6yAWXrIDMABJvOPuo3hQ8grK53WQGU&mc_cid=6a3b519ae4&mc_eid=%5bUNIQID%5d.

9. JoNel Allecia, “Horse meat in the US? Unlikely, but tests are rare,” NBC News, 23 February 2013, <https://www.nbcnews.com/healthmain/horse-meat-us-unlikely-tests-are-rare-1c8512407>.

As the U.S. grows more dependent on Mexico for its domestic supply of meat products, one of the surest ways to reduce the risk of contaminated and adulterated meat reaching American consumers is to put a stop to the horse slaughter pipeline. The overwhelming probability is that a horse bought by a kill buyer today in Colorado, and sent to Mexico for slaughter, will ultimately end up being consumed unknowingly as a fraudulent meat substitute – by someone in Mexico, or perhaps the U.S. or even Colorado. Today, none of the horse meat produced in Mexico ends up in European markets or bistros – its journey is usually one through some reach of black market, as meat substitution is most certainly an intentional fraudulent act, violating a plethora of laws and regulations across Mexico and the U.S.

Indeed, it's only when one considers the substitution value of horse meat – when it's mixed in and passed off as a beef or pork meat product at \$10 or \$20 per pound – that the economics of the U.S. to Mexico horse slaughter pipeline start to make sense. With horse meat marketed as is, fetching only \$1.60 or so per pound, the margins for the kill buyers in the U.S. and the slaughterhouses in Mexico seem almost impossibly small for a financially feasible business. But since the real money is in the fraud itself – substituting out a higher-priced meat with horse – one cannot help but to wonder how far the tentacles of this criminal venture may extend into the kill-buying side of the horse slaughter pipeline, in the U.S. and even Colorado.