



Ministry of Health

Letter dated:
18 July 2012

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**Subject: REGULATION (EC) No 1/2005, ART 27 - INSPECTIONS PERFORMED
IN ITALY DURING 2011 ON THE PROTECTION OF ANIMALS
DURING TRANSPORT**

Pursuant to Article 27(2) of Regulation (EC) No 1/2005, we enclose the report on inspections performed in Italy in 2011 on the protection of animals during transport, accompanied by an analysis of the main discrepancies detected and the action plan to address them.

We apologise for not sending you the report by the deadline laid down in the Regulation. We are at your disposal for any further clarification which you may require.

Yours sincerely,

THE DIRECTOR-GENERAL

Gaetana Ferri

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6. ANALYSIS OF MAJOR DEFICIENCIES DETECTED

(by Professor Nanni Costa, Università degli Studi di Bologna)

This analysis refers to the list of the main infringements found in 2011, involving 250 vehicles, of which 94 were used for the transportation of bovine animals, 67 for pigs, 32 for horses, 27 for sheep, 7 for sheep and goats together, 1 for goats, 2 for dogs, 16 for poultry birds, 2 for game and ornamental birds, 1 for tropical fish and 1 for reptiles. In addition, two infringements related to the transport of pigs by air were recorded in Fiumicino airport.

The infringements were recorded by staff of the Local Health Authorities in the regions of Trentino-Alto Adige, Friuli-Venezia Giulia, Piedmont, Veneto, Emilia-Romagna, Tuscany, Lazio, Campania, Puglia and Sardinia, by staff at the UVAC offices of Friuli-Venezia Giulia, Lazio, Campania and Puglia, officers of the state Police, the traffic police and the local police of Asti and Venezia provinces, and of the Forestry Corps.

The vehicles involved came from Italy (22.8%) and a further 11 European countries (Austria, Belgium, France, Germany, Ireland, the Netherlands, the United Kingdom, Romania, Spain and Hungary). In 82% of the cases the final destination was Italy: other countries of destination were Albania, Bulgaria, Cyprus, Greece, Malta, Poland, Spain, Romania and Hungary.

An overall total of 330 infringements were recorded in relation to Regulation (EC) No 1/2005, of which 124 involved vehicles transporting cattle, 78 vehicles transporting pigs, 45 vehicles transporting sheep and/or goats, 47 vehicles transporting horses, 30 vehicles transporting poultry birds, 2 vehicles transporting game and ornamental birds, 2 vehicles transporting dogs, one vehicle transporting reptiles and one transporting tropical fish.

Table 1 lists the infringements concerning transportation of the commonest species (cattle, pigs, sheep, goats and horses) and of poultry birds, with each type broken down into three groups concerning, respectively, the vehicles themselves, animal welfare, or accompanying documentation as appropriate.

Tables 2, 3 and 4 list, for each type, the number of occurrences and percentage prevalence of each type of infringement for the commonest species.

An examination of Table 1 shows that regardless of the species transported, infringements relating to welfare were the most prevalent, while those relating to the vehicles themselves were the least prevalent. Overall, infringements relating to animal welfare represented over 50% of the infringements associated with the transport of cattle, horses, pigs and sheep, and 40% of those associated with the transport of birds.

Out of the total infringements concerning the vehicles themselves (**Table 2**) those relating to irregularity and/or absence of partitions and stalls, observed in cattle and horse transport respectively, accounted for 30% and 42.9%. The absence of partitions was also penalised in sheep transport. Infringements concerning drinking devices accounted for 66.7% of all infringements relating to pigs, 37.5% for sheep and goats, 20.0% for cattle and 14.2% for horses. Numerous infringements concerning the **loading platform** on vehicles equipped to transport cattle, sheep and goats, and horses were recorded: these infringements accounted for 45%, 37.5% and 42.9% respectively of the total infringements concerning such vehicles. In particular, a considerable proportion of the infringements related to the insufficient height of

the loading platform, which restricts ventilation and does not allow the animals to stand up normally. The frequency of infringements relating to the mechanical ventilation systems out of the total recorded in relation to vehicles is particularly high where pig transport is concerned, accounting for 33.3%, and is lower for sheep and goats (12.5%) and for cattle (5.0%).

Table 3 lists **the proportion accounted for by** the various types of infringement in relation to the total infringements relating to animal welfare. For all of the species taken into consideration, failure to respect resting times was the most frequently recorded infringement, accounting for 76.9% and 85.7% respectively in transport of pigs and sheep/goats. The presence of animals not fit for transport accounted for 27.4%, 7.7%, and 11.5% of infringements relating to cattle, pigs and horses respectively, but was not recorded in transportation of sheep and goats. Overcrowded conditions represented 14.3% of infringements relating to cattle transport, 11.6% for pig transport, 7.1% for sheep transport and 19.3% for horse transport. Dead animals were found only in pig transport (1.9%) while insufficient space above the animals was not infrequently reported in transport of cattle and horses. Out of the total infringements relating to animal welfare, those concerning mixing and maltreatment of animals were infrequent, while in the case of horses a considerable percentage were found to be incorrectly tethered.

Table 4 lists **the** proportion accounted for by the various types of infringement in relation to the total infringements relating to accompanying documents. Out of all of the documentary infringements, non-compliant (missing, incomplete or irregular) journey logs accounted for 58.6% of the total for cattle transport, 74.0% for pig transport, 44.0% for sheep/goat transport and 71.5% for horse transport. The other types of infringements – concerning veterinary certification, transport permits, drivers' certificates of competence and vehicle approval certificates – were less frequent but not negligible. In particular, **the absence of transport permits concerned** 21.9% of the vehicles carrying cattle, 8.7% of those carrying pigs, 22.2% of those carrying sheep/goats and 14.3% of those carrying horses.

The absence of veterinary certification was only recorded in relation to transport of pigs (4.3%) and horses (7.7%). The other infringements were equally or less prevalent. Infringements recorded during inspections of vehicles carrying poultry birds (chickens and turkeys) concerned primarily animal welfare, particularly the size of the cages, which was found to be unsuitable. In the two incidences of transportation of dogs, the infringements found concerned the lack of authorisation and the unsuitability of the vehicles used.

Overall, analysis of the data shows that:

- in 2011, the number of vehicles for which penalties were imposed rose to 250, compared to 162 in 2009 and 154 in 2010; the infringements recorded, 330, showed a disproportionate increase, doubling relative to the 162 recorded in 2009 and the 154 recorded in 2010;
- between 2009 and 2011 the numbers of vehicles on which fines were imposed that were transporting cattle, pigs, sheep/goats and poultry birds rose from 70 to 93, 20 to 67, 13 to 27 and 6 to 16 respectively, while the numbers of those transporting horses fell from 39 to 32;
- relative to the two previous years, in 2011 the overall breakdown of the infringements into the three types taken into consideration changed: **Figure 1** shows that, **as a proportion of** the total infringements recorded, those relating to accompanying documents and to the vehicles themselves fell, while those relating to animal welfare rose;

- an examination of **Figure 2** reveals that the change in 2011 concerned primarily cattle and horse transport, where welfare-related infringements increased considerably. Pig and sheep transport, however, remained largely unchanged in 2011, given that the prevalence of welfare-related infringements was already higher in 2010 than in 2009 (Figure 2);

- the changes described in Figures 1 and 2 are in part related to the activity of a single competent authority which, over the course of 2011, focussed its efforts on verifying compliance with rest times. This in fact caused the numbers of such infringements recorded to rise, with the result that they became the most frequently-recorded infringement concerning animal welfare;

- irrespective of the species being transported, 2011 saw an increase relative to 2009 and 2010 in irregularities concerning the loading platform of vehicles, while in cattle and horse transport infringements relating to partitions and stalls rose;

- irregularities concerning accompanying documents continue to concern journey logs in particular. **Figure 3** illustrates that over the last three years, the numbers of infringements of this type increased steadily for all of the vehicles for which fines were imposed, irrespective of the species being transported.

- over the three-year period 2009-2011 the number of cases involving absence of a transport permit increased gradually. This suggests that the use of non-specialist vehicles may be becoming established in the animal transport sector, associated with the risk of employing staff who do not have the information and training required by Regulation (EC) No 1/2005. We would stress once again that total or partial failure to comply with the requirements relating to accompanying documents is not merely a procedural matter, since there is as yet no substitute for documentation as a means of verifying the conditions under which the animals are made to travel. The refusals to produce the satellite system documentation – observed during checks in 2011 – do not give cause for optimism as regards the possibility of making effective use of electronic systems to simplify record-keeping.

An examination of the figures from 2011 shows an increase in some types of infringement, specifically those relating to welfare, which would seem to indicate a tendency to pay less attention to the conditions under which animals are transported. It is common knowledge that the serious economic crisis has not spared this sector, where competition between vehicles at international level has become particularly keen. Even under these difficult circumstances, increasing checks and continuing to disseminate information could be a useful aid to rewarding operators who maintain high quality standards by complying fully with the legal provisions. As in previous years, the various parties involved in checks on vehicles demonstrated great consistency in their identification and description of infringements, thanks to the continuing efforts to train and inform staff of control bodies.

Table 1. Number and percentage frequency of infringements relating to vehicles, animal welfare and accompanying documents recorded in 2011 for the 244 vehicles transporting livestock species

	CATTLE		PIGS		SHEEP/GOATS		HORSES		POULTRY	
	No.	%	No.	%	No.	%	No.	%	No.	%
Infringements concerning:										
- vehicle	20	16,1	1	3,8	8	17,8	7	14,9	8	26,7
- animal welfare	63	50,8	52	66,7	28	62,2	26	55,3	12	40,0
- documentation	41	33,1	23	29,5	9	20,0	14	29,8	10	33,3
Total infringements	124	100,0	78	100,0	45	100,0	47	100,0	30	100,0

Table 2. - Numbers and percentage frequency of the types of infringement concerning transport vehicles recorded in 2011.

Infringements relating to vehicles	Cattle		Pigs		Sheep/goats		Horses	
	No.	%	No.	%	No.	%	No.	%
<i>Partitions/ stalls for horses:</i>								
absent					1	12,5	3	42,9
non-compliant	6	30,0						
<i>Drinking devices</i>								
absent								
not operational	2	10,0	2	66,7	3	37,5		
insufficient							1	14,2
tanks empty of water								
equipment not adapted to the species	2	10,0						
<i>Ventilation</i>								
not operational	1	5,0			1	12,5		
insufficient			1	33,3				
<i>Loading platform</i>								
insufficient height	2	10,0			2	25,0	3	42,9
ramp non-compliant	2	10,0						
insufficient lighting								
no access allowing checks on animals	3	15,0			1	12,5		
loss of excrement	2	10,0						
<i>Temperature control system</i>								
absent								
not operational								
<i>Bedding</i>								
insufficient								
<i>Satellite positioning system</i>								
absent								
not operational								
<i>Vehicle not suitable</i>								
Total	20	100,0	3	100,0	8	100,0	7	100,0

Table 3. - Numbers and percentage frequency of the types of infringement concerning animal welfare recorded in 2011.

Infringements concerning animal welfare	Cattle		Pigs		Sheep/goats		Horses	
	No.	%	No.	%	No.	%	No.	%
Overcrowding	9	14,3	6	11,6	2	7,1	5	19,3
Resting times not respected	25	39,7	40	76,9	24	85,7	11	42,3
Animals not fit for transport	17	27,0	4	7,7			3	11,5
Dead animals			1	1,9				
Animals not separated by size or sex	5	7,9	1	1,9	1	3,6	1	3,9
Animals incorrectly tethered							3	11,5
Animals maltreated on unloading	1	1,6			1	3,6		
Insufficient clearance above the head/withers (for horses)	6	9,5					3	11,5
Total	63	100,0	52	100,0	28	100,0	26	100,0

Table 4. - Numbers and percentage frequency of the types of infringement concerning documentation recorded in 2011.

Infringements concerning travel documents	Cattle		Pigs		Sheep/goats		Horses	
	No.	%	No.	%	No.	%	No.	%
<i>Journey log and other documentation:</i>								
absent	4	9,8	4	17,4			2	14,3
incomplete	14	34,2	11	47,9	4	44,4	4	28,6
non-compliant	6	14,6	2	8,7			4	28,6
<i>Veterinary certification</i>								
absent							1	7,1
non-compliant			1	4,3				
<i>Transporter's authorisation</i>								
absent	9	21,9	2	8,7	2	22,2	2	14,3
non-compliant								
<i>Vehicle approval certificate</i>								
absent	5	12,2	1	4,3				
non-compliant					1	11,2		
<i>Absence of "live animal" marking</i>								
Vehicle not disinfected	1	2,4					1	7,1
<i>Passport or other means of identification non-compliant or not corresponding to the animals</i>								
Refusal to present satellite system documentation	2	4,9	2	8,7				
Total	41	100,0	23	100,0	9	100,0	14	100,0

Figure 1. Variation of percentage frequency of the three types of infringement over the period 2009 to 2011.

Figure 2. Variation of percentage frequency of the three types of infringement in transport of cattle, pigs, horses and sheep and goats over the period 2009 to 2011.

Figure 3. Variation in frequency of infringements concerning the journey log out of the total infringements relating to accompanying documents over the period 2009 to 2011.

Key:

<i>Documenti</i>	Documents
<i>Veicolo</i>	vehicle
<i>Benessere</i>	welfare
<i>bovini</i>	cattle
<i>suini</i>	pigs
<i>ovicaprini</i>	sheep/goats
<i>equini</i>	horses

7. ACTION PLAN

The analysis of the main irregularities recorded in 2011 concerning the protection of animals during transport clearly highlights the need for the competent authorities to give priority to the following measures:

1) to continue to inform and educate operators who have an active role in the live animal transport sector, and to train persons tasked with enforcing compliance with the rules on the protection of animals during transport:

2) to step up checks.

Concerning the training/information aspects, the Ministry of Health, working with the *Federazione Nazionale degli Ordini Veterinari* (FNOVI, National Federation of Veterinarians) will organise, by the end of 2012, an e-learning training pathway on the protection of animals during transport, with a view to increasing and refining veterinarians' knowledge about the application of Regulation (EC) No 1/2005, with particular emphasis on checks on journey logs and the fitness of animals for travel. The various Italian regions are continuing to organise training courses focussing on the issue of proficiency certificates for drivers and carers, provided for by Regulation (EC) No 1/2005, with the assistance of specifically trained veterinary trainers to ensure that all new operators needing proficiency certificates receive the same training. For persons responsible for enforcing compliance with the rules on the protection of animals during transport, regular training courses continue to be organised with the active participation of experts from the Ministry veterinary services, the Regions and the Local Health Authorities, and experts from the LAV and Animals' Angels animal protection associations.

Implementation also continues of the second phase of the training programme, geared towards training and information for livestock farmers (owners, keepers or holders of the animals), under the auspices of the Regional veterinary services and the AUSL in association with the Italian Livestock Farmers' Association (Associazione Italiana Allevatori) which, to date, has trained some 12 000 farmers during a total of some 200 courses organised in the various regions of Italy. The educational content of the said training programme is still available, for consultation only, on the e-learning training platform accessible to all veterinarians working for the public services and in private practice.

Concerning the protection of animals at the time of slaughter, an e-learning training course for veterinarians will run until 30 November 2012: this course, launched in July 2011 by the Reference Centre for public veterinary health of the Brescia IZS, is designed to disseminate, at national level, the content of the new legislation on the protection of animals at the time of slaughter, and to analyse the critical points during the slaughter of cattle, sheep and goats, and rabbits, and has to date seen the participation of some 600 veterinarians. Furthermore, as far as training/information for persons responsible for slaughter is concerned, the National Reference Centre for Animal Welfare will shortly be distributing a loose-leaf manual and a DVD in Italian and English to the local health authority veterinary services and the category associations.

Concerning the priority measures geared towards stepping up checks and the extension of the National Animal Welfare Plan – including the minimum checks to be carried out each year on the protection of animals during transport – on 3 October 2011 the Ministry of health and the Ministry of the Interior signed a memorandum of understanding on stepping up checks on the

legality of operations in the international animal transport sector by means of synergetic action on the part of the two authorities intended to standardise – in quantitative and qualitative terms – roadside checking activities on vehicles carrying live animals. The memorandum of understanding also provides for training for traffic police officers, veterinarians and technical/health staff of the UVAC offices of the Ministry of Health that carry out checks in relation to the protection of animals during transport.