

Analysis of major deficiencies detected during the non-discriminatory inspections and action plan to address them as provided for in Article 27(2) of Regulation (EC) No 1/2005

Abbreviations used in this document.

AWD	Animal Welfare Division
CA	Competent authority
CCA	Central competent authority
DAFM	Department of Agriculture, Food and the Marine
DVO	District Veterinary Office
MS	Member State
OV	Official Veterinarian
VPHIS	Veterinary Public Health Inspection System

Member State: Ireland

Year: 2012

Explanatory Notes:

- (i) *In this report, type 1 inspections include all pre-loading inspections carried out at assembly centres or holdings (pigs) prior to export as well as all transport inspections carried out at slaughter plants i.e. where a consignment is selected for a specific transport inspection including a check on the vehicle, animals and in some cases the accompanying documentation. The total number of slaughter plant checks do not include fitness to transport checks that take place as part of the normal intake procedures at slaughter plants though non-compliances reported on foot of these inspections are included in the non-compliance section of the table.*
- (ii) *Type 2 inspections include inspections carried out at markets within Ireland and inspections carried out on consignments of animals at Rosslare port just prior to them being loaded onto the ferry for export. Although the inspections at Rosslare port do not check compliance with all aspects of Regulation 1/2005 as regards the means of transport they include checks on issues such as water levels, deck height, lashing points and therefore they are included in this report as checks on the means of transport. Similarly although the animals on board the vehicles inspected at Rosslare port are not individually checked, they are visually checked for fitness to transport and therefore they are include in the overall number of animals inspected in this category.*

- (iii) *Not all of the information required by the new reporting format is available for the 2012 transport report. For example Ireland implements a system whereby approximately 25% of returned journey logs are selected for detailed checks by officials in the DVO in which the journey originated. The selection of these journey logs is based on the risk of non compliance associated with the transporter responsible for the individual journeys. DVO officials are instructed to deal with minor deficiencies at a local level and report any major deficiencies to the CCA. However details of the total number of such documentary checks carried out on an annual basis and the results of these checks is not recorded centrally. This will be addressed during 2013. In addition the data gathered during verification checks carried out at Rosslare port described above is not fully compatible with the new report format. This will be addressed during 2013.*
- (iv) *The system of formal collaboration that has been in place between France and Ireland since 2011 continued to operate during 2012. A total of 184 consignments of calves originating in Northern Ireland and the Republic of Ireland were monitored by the French authorities for compliance with journey time and rest period requirements as they transited France. This system is viewed by the CCA as a very important enforcement tool. For that reason the results of the follow up to these checks are included at paragraph 4 below despite the fact that the actual transport checks were carried out by the French authorities.*

ANALYSIS OF THE MAJOR DEFICIENCIES DETECTED DURING NON-DISCRIMINATORY INSPECTIONS 2012

For the purpose of this annual report, the following have been considered to be major deficiencies:

Any deficiency that had a direct negative impact on the welfare of the animals being transported or one which is likely to have a direct negative effect on the animals at some point during the planned journey. The decision to define a deficiency as “major” takes into account all relevant issues relating to the journey such as the type of animals being transported (e.g. the effect of wet/insufficient bedding on young animals verses adult animals), the length of the intended journey (e.g. necessity for the provision of water and temperature control on long journeys), the current and expected weather conditions and so on. The definition also takes into account the action taken to address the non compliance and the timeframe in which the issue was rectified, that is, a non-compliance could be considered a major non-compliance in itself (e.g. water drinkers not working), but due to the fact that it was rectified on the spot on foot of a routine check by an OV or by the transporter prior to the commencement of the journey, it is not considered to be a major non-compliance.

Further detail and analysis of major deficiencies

1. Fitness for transport

As can be seen from table 2 in the attached report there were 108 inspections during 2012 where a non compliance in relation to fitness to transport was detected. 80 of these were detected at the assembly centre or holding of origin prior to the animals being transported

on a long journey (exported). In each individual case between 2 and 6 animals were deemed unfit for transport as result of illness/injury (e.g. lameness) or being underage in the case of calves. This figure appears high at first glance however it can be explained as follows; In Ireland the loading of approximately 90-95% of consignments of animals for export is supervised by an OV. The fitness to transport assessment element of this supervision may include a check on the animals in their pens before loading, during routine tagging and identification checks and during loading itself. Therefore animals that are unfit to transport by virtue of illness or age are routinely removed from the consignment by either the OV or the transporter/organiser at any stage of this process and therefore the number above does not reflect an attempt on behalf of the transporter/organiser to transport animals that are inherently unfit. Therefore although deficiencies relating to fitness to transport are considered major deficiencies, in this context they are routinely and regularly address as part of DAFM's normal pre-export inspection procedures and therefore they are considered minor issues.

25 fitness to transport non-compliances were detected during routine ante mortem checks at slaughter plants during 2012. 24 related to bovine animals and 1 to an equine animal. They involved animals being transported with fractured limbs, chronic lameness and the presence of infectious disease. All were followed up by either issuing a legal notice to the keeper, a formal warning letter to the certifying veterinarian (in 2 cases), by cross reporting the incident to the relevant DVO for on farm follow up, or by issuing a verbal warning in the less serious cases. Such issues usually occur occasionally at slaughter plants either as a result of keepers being unaware/unsure of the fitness for transport rules or where they choose to ignore these rules. However of the 1,396,056 bovine animals inspected at slaughter during 2012, only 0.0017% presented with issues that would have deemed then unfit for transport.

2. Transport practices/space allowance/height

Of the 16 deficiencies recorded during category 1 inspections (i.e. at the place of departure or slaughter plant), the majority were minor issues relating to inadequate hygiene or in one case inadequate internal partitions. Four non-compliances related to stocking density, all of which were rectified on the spot by removing 1 or 2 animals from the consignment prior to transport.

One **major** deficiency was detected during a pre-export inspection of a consignment of spent hens at the holding of origin. This related to improper handling of the birds during catching and loading which resulted in their welfare being compromised. The issue was reported to the CCA by the inspecting OV. A formal warning letter was issued to the transporter involved by the CCA on this occasion. Having examined the reply to this letter it appears that this non compliance occurred in this case as a result of a lack of care on behalf of the driver involved who failed to supervise those catching and loading the birds. There is no evidence that this incident occurred as a result of a lack or awareness or understanding of the requirements. The action plan below includes details on how the CCA plans to address this issue during 2013 and 2014.

The majority of the 46 non-compliances detected during category 2 inspections were detected during the inspection of transport vehicles at internal markets and related to minor structural deficiencies in relation to loading and unloading facilities and hygiene. Such issues occur usually as a result of lack of care/maintenance of high throughput vehicles and poor implementation of cleaning and disinfection procedures. The majority of these issues were rectified by issuing a verbal warning to the transporter and in most

cases they were rectified on the spot. Two non-compliances were recorded during routine checks at Rosslare port relating to deck height. In both cases the deck was adjusted before the journey was allowed to continue. Such non-compliances occasionally occur due to a difference in the interpretation of the requirements in relation to what is the acceptable minimum deck height for different species.

3. Means of transport

Of the 10 vehicle non-compliances identified during category 1 inspections, 5 were identified during pre-loading inspections at export assembly centres. While all 5 issues were of a serious nature (2 sharp projections, 2 incidents where a ventilation fan was not working and 1 where a drinker was not working), they were either rectified on the spot (by carrying out essential repairs) or within an agreed timeframe (where there was no imminent risk to the welfare of the animals). The remaining 5 non-compliances were identified during inspections at slaughter plants and related to minor structural issues with vehicle's ventilation apertures and internal partitions. Again such non-compliances usually occur as a result of lack of maintenance of high throughput vehicles.

However the majority of vehicle non-compliances were identified however during the inspection of vehicles at internal markets during 2012. 58 of these related to the transport of bovine and ovine animals on journeys less than 8 hours in duration. The majority of these involved the detection of relatively minor structural deficiencies which again occur as a result of inadequate maintenance of high throughput vehicles. The issues were either rectified on the spot, or in some cases a verbal warning was issued to the transporter by the OV and a re-inspection date arranged for the vehicle. In **4** cases where **major structural deficiencies** were detected during these inspections, a legal notice was issued to the transporter involved instructing him/her to address the deficiencies. All four notices related to vehicles with serious structural defects such as sharp projections and floor / tailgate defects which would endanger the welfare of the animals being transported should they remain unaddressed.

4. Watering / feeding / journey times and rest periods

Three non-compliances were detected in relation to feed, water, journey times etc in category 2 inspections. Two were minor issues detected during checks at Rosslare port. Both related to inadequate water levels and were readily addressed by topping up the volume of water in the vehicle's water tanks. Such non-compliances occasionally occur as a result of a failure on behalf of the driver or in some cases as a result of frozen water due to low temperatures pre-loading. The other was detected during the inspection of a vehicle carrying a single animal which was carried out as part of an ongoing animal welfare investigation relating to a specific keeper. A legal notice was issued to the keeper in this case and the issue was addressed immediately.

9 alleged journey time and rest period infringements were notified to the Irish CCA during 2012 by the French authorities. These infringements were detected on foot of checks carried out at French control posts as part of the ongoing system of formal collaboration between France and Ireland referred to at explanatory note (ii) above. All such infringements were considered to be major non-compliances. 7 of the 9 infringements related to transporters from a different MS and these were referred to the relevant CA for follow up action. The 2 remaining alleged infringements were investigated by the CCA. In one case section 4 of the returned journey log indicated that

the transporter had stopped at a control post different to that listed in section 1 as the control post he planned to stop at was full. This occasionally occurs when there is a high demand for accommodation in the control post located in the vicinity of Cherbourg port. The CCA has taken steps in 2013 to address this issue by introducing a pre-booking system for this control post (see action plan below). In the second case the required rest stop was not made and action against the driver in this case is pending.

5. Documentation

The 7 non-compliances recorded during category 1 inspections related to 5 inspections where the transporter failed to produce his/her transporter authorisation and/or certificate of competence. The transporters involved were known to the inspecting OV and were appropriately trained and authorised. A verbal warning was issued reminding the transporter of the need to carry this documentation at all times.

61 of the 62 non-compliances that occurred during category 2 inspections were detected during documentary checks at Rosslare port and all related to minor omissions from journey logs, section 1. Although these deficiencies are considered to be minor for the purposes of this report, the rate at which they occurred during 2012 is some cause for concern and for that reason the CCA intends to take action to address this issue during 2013 (see action plan for further detail).

The 8 incidents cross reported to other MS included in “category of action taken” related to cases where transporters authorised in another MS failed to return journey logs to the Irish CA within the required 30 day period.

ACTION PLAN TO ADDRESS THE MAJOR DEFICIENCIES

As described above the majority of non-compliances detected during checks carried out in 2012 were minor issues. However the major deficiencies that were detected will be addressed as follows:

Fitness for transport

As detailed above, DAFM’s current inspection procedures ensure that 90-95% of pre-export loadings are supervised by an OV. Therefore fitness for transport issues at the point of departure will continue to be detected and addressed during these inspections.

As detailed on the analysis section above, the number of fitness for transport issues detected at slaughter plants during 2012 was low. However all such issues are viewed as major non compliances. In order to address these issues and to raise awareness amongst keepers of the fitness for transport requirements, DAFM continues to operate its internal cross divisional reporting system. This system allows the OV at the slaughter plant to formally notify the DVO in which the keeper’s herd is located of these non compliances so that they can be followed up at herd level if warranted, in addition to any action taken by the slaughter plant OV on the spot. Any follow up action at herd level will therefore raise awareness among keepers of the fitness for transport rules and also the fact that the transport of unfit animals will not be tolerated.

Transport practices

One major deficiency was detected during the inspection of a consignment of spent hens during loading and this will be addressed as follows; DAFM operates a risk based system

for selecting transporters and vehicles for targeted transport inspections on an annual basis. As a result of this incident the transport company involved, which is the biggest poultry transport company in Ireland, was selected for two additional transport inspections during 2013. In addition all other poultry transporters authorised to transport poultry on long journeys were selected for transport inspections during 2013. The results of these inspections will provide the CCA with a balanced picture of catching and handling procedures used by poultry transporters and enable it to take specific follow up action should deficiencies in this area be identified.

Means of transport

Any non compliance identified during the inspection of a vehicle prior to the commencement of a long journey is viewed as serious because of the potential impact on animal welfare. However as Ireland continues to operate an inspection system whereby approximately 90-95% of consignments of livestock destined for export, and the means of transport used, are inspected by the OV at the assembly centre/holding of origin, just prior to departure. As a result of this intensive inspection system, such non compliances will be identified and addressed before the journey commences.

Of the 58 non compliances identified during vehicle inspections carried at internal livestock markets (journeys <8 hours only), only 4 were considered to be major deficiencies. This equates to approximately 1% of the total number of inspections carried out at markets (bovine and ovine animals only) during 2012. Such non-compliances occur as a result of inadequate maintenance of the vehicle due to lack of care by the owner or in some cases as a result of lack of financial resources.

In order to ensure in so far as possible that vehicles at the highest risk of non compliance are inspected the CCA operates a risk based system to select livestock vehicles for inspection on an annual basis. This system has been in place for a number of years now and the CCA believes that this system will ensure that the standard of vehicles used for journeys within Ireland remains high and number of major non compliances identified minimal.

Watering / feeding / journey times and rest periods

The formal system of collaboration that is in place between France and Ireland since 2011 represents a key control in relation to monitoring compliance with journey time and rest period requirements by Irish transporters, particularly those transporting calves. During 2012 it became evident from the results of the monitoring system that the one control post located in the vicinity of Cherbourg port was not being used to full capacity by calf transporters from Ireland. Therefore in early 2013 after further discussions between the French, Irish and Northern Irish authorities, a new booking system for that control post was introduced. This system aims to ensure that this control is used to full capacity before the use of a control post further for Cherbourg port is sanction for resting calves. This booking system should also ensure that transporters are aware of what spaces are available in the vicinity of Cherbourg port so that they can execute their journey as planned and without any unnecessary delays.

Documentation

As mentioned in the analysis section above, 61 of the documentary non-compliances were detected during journey log checks (section 1) at Rosslare port. While all of these deficiencies minor in nature (e.g. total space provided/estimated total weight of

consignment not filled in), the non compliance rate is unacceptably high (29%). All regional staff involved in the assessment and approval of journey logs at the place of departure will be reminded to ensure that journey logs (section 1) are completed properly and entirely by the organiser before the journey is sanctioned.

Other actions to address transport issues during 2013 and 2014

Revision of the transport inspection system

The revision of Ireland's transport inspection system will take place before the end of 2013 to take into account the new reporting format for the transport report, as per Commission Implementing Decision 2013/188/EU. The intention is to revise the current transport inspection forms and checklists to ensure that the data gathered during all transport inspections corresponds to the new reporting format. In addition guidelines for staff carrying out the inspections will be provided and additional training if deemed necessary.

Poultry and Equine transport targets 2013 and 2014

As detailed above, the CCA will continue to focus on the inspection of poultry transporters during 2013 and if necessary 2014.

In order to increase the number of transport inspections carried out on equine vehicles, in particular lower value equines, the CCA issued an instruction to DVOs in early 2013 to significantly increase the number of horse transport vehicles inspections carried out at horse markets and fairs during 2013. In addition there are now four horse slaughter plants in Ireland, all of which are supervised by DAFM. Slaughter horses are also deemed to be a high risk category of animal when it comes to transport due to their relatively low monetary value. For this reason the CCA will also focus on increasing the number of transport inspections carried out at horse slaughter plants during 2013 and 2014. These actions should significantly increase the number of horse transport inspections carried out during 2013 and 2014 and provide an accurate picture of the standard of vehicles and practices used to transport horses on short journeys within Ireland.

Training

DAFM has an ongoing training programme for all staff involved in carrying out transport inspections. In 2012/2013 the responsibility for carrying out a proportion of transport inspections (vehicles used for journeys <8 hours only) was transferred from veterinary staff to technical staff. Prior to this changeover occurring, all technical staff were trained on all aspects of Regulation 1/2005 as it relates to the requirements for journeys < 8 hours in duration. Each training session included both theoretical and practical sessions.

During 2013/2014 the CCA will provide training for all DAFM staff involved in carrying out official controls in relation to the transport animals on journeys > than 8 hours on the operation of commonly used navigation systems, as provided for in article 16 of Regulation 1/2005. The training will focus on putting in place a system that will allow DAFM staff to use the data recorded by the navigation systems to assess compliance with journey time and rest period requirements by transporters.

