

# The journey of Easter and Christmas lambs

Long-distance transports of lambs to Italy for slaughter

2016-2019



2016

2017

2018

2019

ANIMAL WELFARE FOUNDATION **AWF** | **TSB** TIER SCHUTZ BUND ZÜRICH

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## I. Introduction

This dossier focuses on transports of lambs<sup>1</sup> from Hungary, Romania and Poland to Italy, documented between 2016 and 2019 by teams of AWF|TSB (Animal Welfare Foundation, AWF, based in Germany and Tierschutzbund Zürich, TSB, based in Switzerland) with support from Animal Equality Italy, Ente Nazionale Protezione Animali (ENPA) and Guardia Zoofila in 2018 and 2019. The main focus is on the transport of lambs which are slaughtered in Italy for Easter and Christmas celebrations. In total 17 transports of lambs were documented in detail, in most of the cases with serious infringements of the Council Regulation (EC) No 1/2005 of 22 December 2004 on the protection of animals during transport.

The dossier brings together all infringements of the Regulation (EC) No 1/2005 documented by AWF|TSB during investigations of transports of lambs to Italy. It shows that the main infringements are mostly related to the fact that the loading densities are much too high comparing to the requirements, and that some animals transported are very young, so young that they cannot be supplied according to their needs on long-distance transports.

In addition, the dossier shows that several companies repeatedly transport lambs in a way that is a breach of the Regulation (EC) No 1/2005, in some cases even despite numerous police controls and fines. This unacceptable practice can be explained by the lack of notifications between the authorities from the member state of destination and the member state of departure, and the fact that the penalties applied (both police fines and official complaints) have not been effective, proportionate and dissuasive and therefore have not led to significant improvements of enforcement of the Regulation (EC) No 1/2005.

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<sup>1</sup> Sheep under one year of age.

## Documented transports

The [Table 1](#) below sums up all the 17 transports of lambs inspected by AWF|TSB from 2016 to 2019. The transports that were also inspected by the police are marked in blue. Out of all documented transports, 11 went to the slaughterhouse I.L.C.O. SRL in Acquapendente. However, the problems are systematic and independent of the place of destination. Furthermore, in transports with other slaughterhouses as destination, infringements such as too many animals or a lack of headspace were documented as well.

*Table 1. Documented transports of lambs. Note: transports marked in blue were also inspected by the police.*

Transport No	Inspection date	Licence plate trailer	Transport company	Origin country of the lambs	Place of departure	Place of destination in Italy	Total transport distance in km
1	03/16	(H) XYH802	Erdőhát Transzport Kft.	Poland	Bańska Niżna (PL)	Acquapendente, I.L.C.O. SRL	1,547
2	03/17	(H) XYC345	Erdőhát Transzport Kft.	Poland	Bańska Niżna (PL)	Acquapendente, I.L.C.O. SRL	1,471
3	03/17	(H) XYC343	Erdőhát Transzport Kft.	Hungary	Apaj (H)	Acquapendente, I.L.C.O. SRL	Unknown
4	03/17	(H) XYC346	Erdőhát Transzport Kft.	Poland	Lubosz (PL)	Acquapendente, I.L.C.O. SRL	1,600
5	03/18	(H) CL841RC	Rossi Sauro SRL Unipersonale	Hungary	Piricse (H)	Foligno, Mascioli Carni SRL	1,422
6	03/18	(RO) GJ30VAS	Sc Rovatrans	Romania	Unknown	Unknown	Unknown
7	03/18	(RO) SB65DOB	Dobrota Trans SRL	Romania	Romos (RO)	Acquapendente, I.L.C.O. SRL	1,590
8	12/18	(H) XYC345	Erdőhát Transzport Kft.	Hungary	Piricse (H)	Acquapendente, I.L.C.O. SRL	1,400

9	12/18	(RO) CT29CCG	Al Kastal Chartering SRL	Romania	Crucea (RO)	Acquapendente, I.L.C.O. SRL	2,190
10	12/18	(H) XYH801	Erdőhát Transzport Kft.	Hungary	Kunfehértó (H)	Acquapendente, I.L.C.O. SRL	1,169
11	12/18	(RO) SB10XNU	Dobrota Trans SRL	Romania	Livezile (RO)	Acquapendente, I.L.C.O. SRL	1,663
12	12/18	(RO) CT75CCC	Al Kastal Chartering SRL	Romania	Crucea (RO)	Acquapendente, I.L.C.O. SRL	2,190
13	04/19	(RO) FN694CB	F.LLI Ceccarini SRL	Romania	Jamu Mare (RO)	Lucca, Matteoni	1,364
14	04/19	(RO) DB48 RZV	SC Brutaru SRL	Romania	Jamu Mare (RO)	Tuscania, IN.CAR SRL	1,561
15	04/19	(RO) CJ78GDF	Interexpress	Romania	Valea lui Mihai (RO)	Roma, Pewex Al.Pa	1,512
16	04/19	(H) XYC345	Erdőhát Transzport Kft.	Hungary	Kunfehértó (H)	Acquapendente, I.L.C.O. SRL	1,218
17	04/19	(I) XA696FA	Autotrasporti Cutilli Di Cutilli Romeo & C.	Hungary	Berettyóújfalu (H)	Casalnuovo Di Napoli, R.& C. OVINI SRL; Vitulano, G.C. CARNI SRL; Ruvo del Monte, OVINEX S.R.L.S	1,693

The map below ([Figure 1](#)) shows as an example eight routes of the documented transports of lambs to slaughterhouse in Acquapendente/Italy, with different places of departure in Poland, Hungary and Romania.

In addition to transports listed in [Table 1](#), under the law on public information and GDPR, AWF|TSB requested documents of lamb transports from official veterinarians in Poland. These documents cover six transports of lambs from Poland to Acquapendente in Italy. The analysis of the documents revealed that they were all in breach of the Regulation (EC) No 1/2005. For more details see ([Annex](#), Analysis of information from journey logs and SNS data: March 2018).

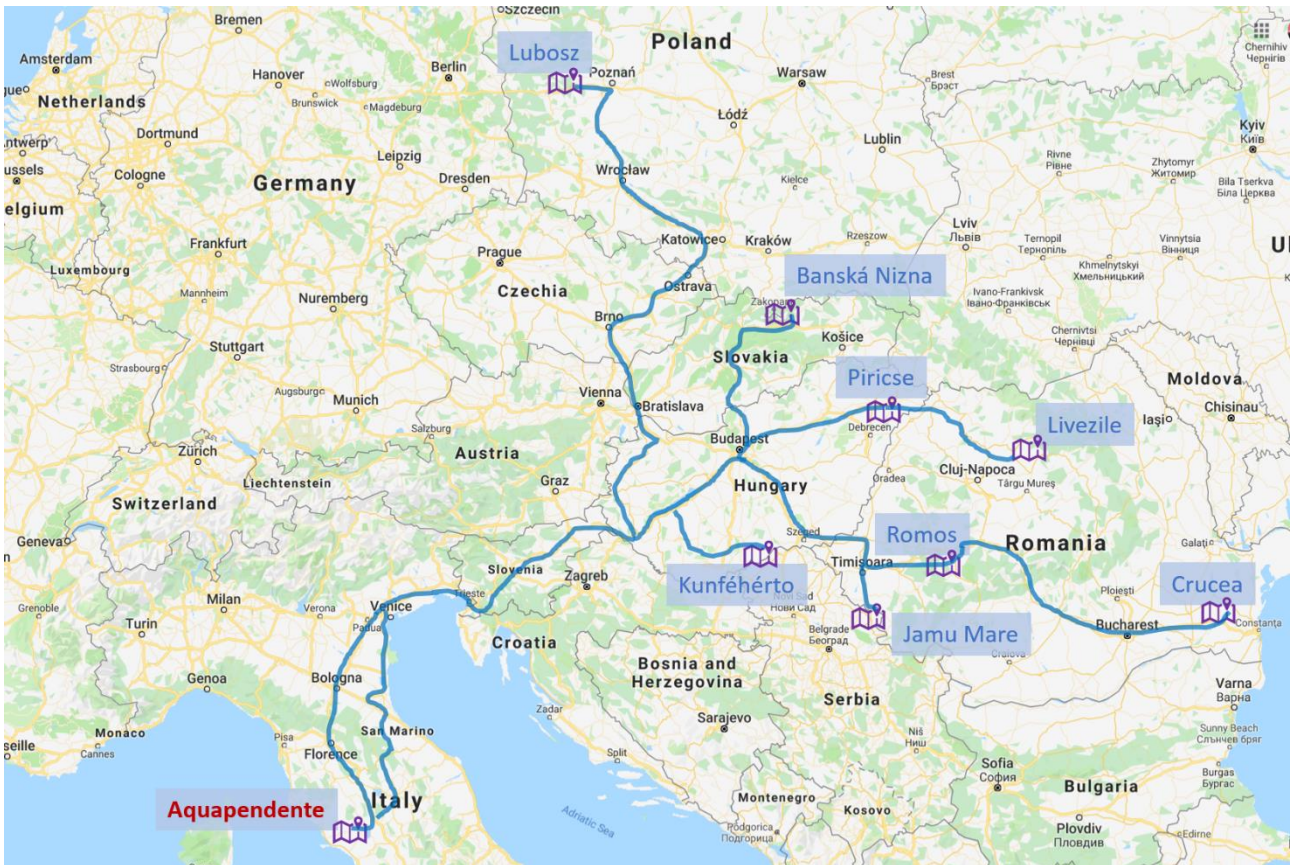


Figure 1. Map: Routes of eight transports of lambs to the slaughterhouse in Acquapendente/Italy, with places of departure in Romania, Poland and Hungary.

## Background information

In Italy, lamb is a delicacy and not only at Easter, but also at Christmas a main part of many festive meals. However, what is often hidden is that, until the lambs are slaughtered in Italy, they often are transported for days in unsuitable vehicles in unacceptable conditions. Although Italy itself has more than seven million sheep<sup>2</sup> (most of them bred in the regions Lazio and Tuscany<sup>3</sup>), Italy is not self-sufficient in terms of demand for lamb meat.

In 2018, Italy imported 901,046 lambs for slaughter. Out of this number, more than 150,000 were imported for slaughter short before Christmas, and more than 200,000 before Easter. Most of the lambs came from Hungary (476,359), Romania (336,734), France, Bulgaria and Spain. Poland, where three transports documented by AWF|TSB originated, exported approx. 13,000 lambs to Italy in 2018. In addition to that, Italy imported 72,706 sheep in 2018, with a peak in March (17,637, majority from Romania)<sup>4</sup>. As can be seen from the graph below (Figure 2) while for example from France and Poland the supply of lambs to Italy has decreased, the supply from Hungary and in particular from Romania has risen significantly from 2016 to 2018.

<sup>2</sup> As of December 2018, according to Eurostat, <https://ec.europa.eu/eurostat/tgm/table.do?tab=table&plugin=1&language=en&pcode=tag00017>, checked on April 17, 2019.

<sup>3</sup> Source: Eurostat, data extracted on June 18, 2019.

<sup>4</sup> Source: Eurostat, data extracted on June 11, 2019.

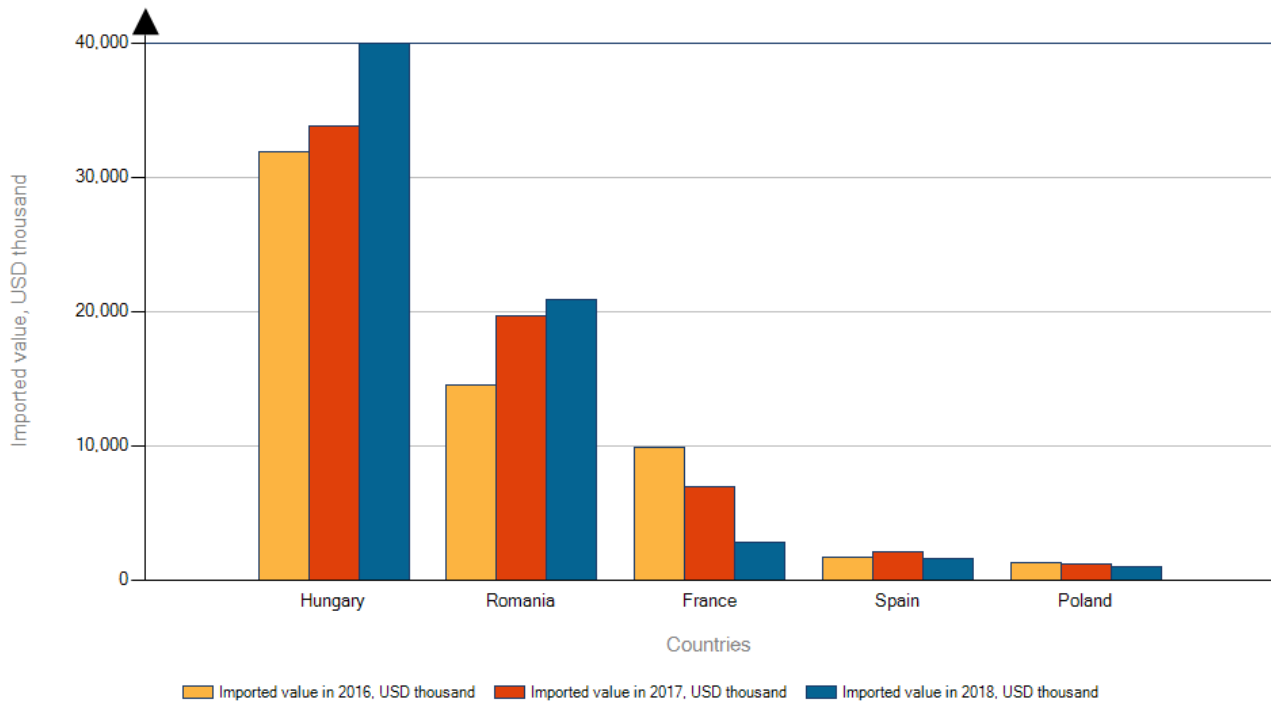


Figure 2: Import of lambs to Italy, in USD thousands (Source: ITC Trademap<sup>5</sup>)

In total, each year more than three million sheep are transported within the EU, out of which more than two million are intended for direct slaughter, and almost one million for fattening (i.e. later also for slaughter). Italy imports approximately 40% of all sheep intended for slaughter in the EU. Out of this, young animals (less than one year old) are the majority of animals transported to Italy for slaughter (85% in 2016).<sup>6</sup>

For the animals, transport means stress of unfamiliar environment, noises and vibrations, being mixed with unknown animals, reduced ability to move, as well as restricted access to food and water, among other things. Hence, every transport is a source of stress and suffering for the animals (Consortium of the Animal Transport Guides Project 2018, p. 8).

Some of the transported lambs are not even weaned when transported for slaughter to Italy. This means they still rely on a milk diet. However, milk replacers cannot be provided on the vehicles. In various cases, AWF|TSB documented road vehicles full of young lambs, which were bleating during the whole journey, which indicates stress, and in most cases hunger and thirst. In particular before Easter, many unweaned animals are transported for slaughter. According to the documents, numerous the lambs are indicated as two months old; however, according to veterinarians of AWF|TSB, in several cases the animals were likely even younger.

From Romania often lambs of Turcana<sup>7</sup> sheep are transported, a typical Romanian breed which accounts for 75% of the national flock (Budai et al. 2013, p. 4) and is adapted to Romanian natural conditions. The breed is a robust multi-purpose breed which offers milk, meat and wool.<sup>8</sup> Lamb production is very important in Romania. However, there is no specialized meat breed and the production of lambs is based on such multi-

<sup>5</sup>[https://www.trademap.org/Country\\_SelProductCountry\\_TS\\_Graph.aspx?nvpm=1%7c381%7c%7c%7c%7c01041030%7c%7c%7c8%7c1%7c1%7c2%7c1%7c2%7c1%7c1](https://www.trademap.org/Country_SelProductCountry_TS_Graph.aspx?nvpm=1%7c381%7c%7c%7c%7c01041030%7c%7c%7c8%7c1%7c1%7c2%7c1%7c2%7c1%7c1)

<sup>6</sup>Source: Eurostat.

<sup>7</sup>Also known as Tsurcana or Valachian sheep.

<sup>8</sup>Source:<https://seradria.com/sheep-breeds/tsurcana-sheep>; <https://www.fondazioneSlowFood.com/en/ark-of-taste-slow-food/surcan-sheep/>

purpose breeds (Budai et al., p. 4), like e.g. the Turcana breed, which only has a modest potential for meat production (Gavojdian et al. 2016, p. 291).

Similar characteristics apply to Polish mountain sheep which are frequently exported from Poland. They are mainly reared in the mountainous region of Podhale in central southern Poland. Podhale has a long tradition of breeding these sheep which are robust, but smaller than typical meat sheep, have a lower fertility rate and produce less milk than modern breeds. Lambs from such indigenous breeds, reared extensively on mountain pastures, are bought because of the high quality of the lamb meat. In the traditional breeding system, the lambs are weaned from their mothers according to the date when the sheep leave the pasture (enough green regrowth in the pasture), usually at the end of April or in the first decade of May<sup>9</sup>. Weaning takes place after 80 to 120 days of age<sup>10</sup>, which means many of the lambs transported at the age of two months would still rely on a milk diet. The late weaning of indigenous breeds consequently has an impact on transport times, because unweaned lambs should receive adequate liquid already after 9 hours of transport (instead of after 14 hours) and they should be transported no longer than 19 hours in total (instead of 29 hours) according to the Regulation (EC) No 1/2005.

Besides the problems related to the transport of unweaned lambs, various other infringements of the Regulation (EC) No 1/2005 causing undue suffering to the animals were documented. Infringements are frequently related to the planning of the transports, the available space for the animals and the arrangements to meet animals' needs as regards rest, feed and water. Furthermore, the vehicles used are often inappropriate for the transport of lambs. In addition to that, infringements related to the documentation and traceability of transports were frequently found; such infringements also have an essential impact on the welfare of transported animals.

The next chapter summarizes the findings of the transports of lambs documented by AWF|TSB.

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<sup>9</sup> Source: *Charakterystyka systemów chowu owiec i efekty odchowu jagniąt w gospodarstwach rodzinnych utrzymujących wybrane rodzime rasy owiec\** *Wiadomości Zootechniczne*, R. LV (2017), 5: 155–167, Bronisław Borys, Jan Knapik p.158

<sup>10</sup>Source: *National Research Institute of Animal Production, Sheep breeding technology. IMPROFARM - Improvement of Production and Management Processes in Agriculture Through Transfer of Innovations, Leonardo da Vinci Transfer of Innovations programme, number 2011-1-PL1-LEO05-19878.*



## II. Findings from investigations (2016-2019)

In the following chapter, the main problems documented by AWF|TSB in long-distance transports of lambs to Italy are listed. In addition, the articles of the Regulation (EC) 1/2005 which were violated are added, as well as a brief description of the animal welfare problems and recommendations of improvements. The recommendations are based on the Regulation (EC) No 1/2005, as well as on scientific studies and letters of the European Commission. Several recommendations also refer to the “Guide to good practices for the transport of sheep”<sup>11</sup>, which has been published within the framework of a DG Sante project of the European Commission.

### a) Inadequate and/or insufficient drinking devices

In all of the documented transports (see Table 1), the drinking devices on board of the vehicles were not appropriate for lambs, i.e. there were metal nipples designed for pigs, and many lambs (in particular the very young animals) did not know how to use them. In most of the cases, in addition, the number of drinking nipples was much too low for the number of animals on board of the vehicle. In some cases, the drinking devices were not accessible for the animals. Frequently, a too high loading density (see section below: b)) impeded the natural movement of the animals and easy access to drinkers. Hence, in the above-mentioned transports, not all the animals on board had access to water, which is in breach of the Regulation (EC) No 1/2005. A lack of access to water leads to frustration as well as health problems and dehydration of the animals (Consortium of the Animal Transport Guides Project 2018, p. 53). For details on the drinking devices on board of the road vehicles and the associated welfare problems, please see the reports attached in the Annex (Reports of the AWF|TSB-investigations from 2016 to 2019).

**Drinkers should be of a design that animals are familiar with. For sheep, only drinkers with a visible open water surface are suitable. Taking into account the currently predominant drinking devices on board of the road vehicles, this means transporters should water the animals manually with troughs, especially during hot weather and delays.** According to the Regulation (EC) 1/2005 (Annex I, ch. VI 2.1) the vehicles “[...] shall be equipped with a water supply that makes it possible for the attendant<sup>12</sup> to provide water instantly whenever it is necessary [highlighting through TSB|AWF] during the journey, so that each animal has access to water”. Consequently, the vehicle itself also should be equipped with adequate drinking devices for the species transported. **As long as this is not the case, vehicles which have drinking devices which are not at all suitable for lambs should not be authorized for long-distance transports of lambs.**<sup>13</sup>

In general, the number of drinking devices should be appropriate for the number of animals on board and positioned appropriately for the type and size of animals. The decks of the road vehicles should be in a

<sup>11</sup> The document has been prepared by the Consortium of the Animal Transport Guides Project. Please note: The document provides recommendations for good practice in line with the Regulation (EC) 1/2005 and best practice. It “is not of legally binding nature and does not affect the requirements of the EU legislation on animal transport or other relevant pieces of legislation. Nor does it commit the European Commission. Only the Court of Justice of the European Union is competent to authoritatively interpret Union law. The reader is therefore invited to consult this guide in connection with the relevant provisions of the legislation and refer, when necessary, to the relevant competent authorities.” (Consortium of the Animal Transport Guides Project 2018, p. 8).

<sup>12</sup> ‘attendant’ means a person (in this case the driver) directly in charge of the welfare of the animals who accompanies them during a journey.

<sup>13</sup> For the specific problem of drinking devices for unweaned animals, see the section on unweaned animals below m).

position that all animals have access to drinking devices. This might mean to transport animals on less decks, depending on the construction of the road vehicle.

- **Violation of Reg. 1/2005:** Art. 3 a), c), h); Art. 6.3, 6.4; Art. 18.1 b); Annex I, ch. III 2.7; Annex I, ch. VI 2.1-2.2
- **Responsibilities:** Competent authority that approved the journey, veterinarian at the place of departure, authority that approved the vehicle, transporter, transport organiser, attendant/driver<sup>12</sup>, keeper and competent authority at the place of destination.

#### b) Insufficient floor space for the lambs

In 15 of the inspected transports the number of lambs was too high in relation to the total available surface area (e.g. in the case of Dobrota, (RO) SB65DOB, there were 850 lambs on the road vehicle, for other figures see [Table 2](#) below). In these 15 vehicles, there was not enough space for all animals to lie down and rest at the same time. Such a loading situation with no possibilities to rest leads to exhausted animals and has thus a detrimental effect on animal welfare (Consortium of the Animal Transport Guides Project 2018, p. 9). In addition, a too high loading density (in particular in combination with a lack of sufficient headspace, see section below: [c](#))) impedes adequate ventilation. The situation for the lambs was even worse in cases where not only shorn lambs but also unshorn animals, or horned animals were transported, which need more space in addition (see section below: [f](#))).

The animals should have enough space, so that they can turn around easily and rest at the same time. This is also important with regard to the access to water devices. In case of unshorn sheep, more floor area is needed (25% more than for shorn sheep). In case of horned animals, the lambs should also be loaded less densely (with an increase of at least + 10% space).

Furthermore, in many cases, the total surface area available entered in documents was higher than in reality. This was one reason for a too high number of lambs in relation to the surface area available in reality and consequently had a negative effect on the welfare of the transported lambs (see section below: [i](#))).

According to a report of the Scientific Committee on Animal Health and Animal Welfare (European Commission, Scientific Committee on Animal Health and Animal Welfare 2002, p. 98), the space for each lamb on board of a vehicle should be calculated according to the following formula if sheep are unshorn and the journey lasts more than 12 hours:  $A=0.044W^{0.67}$  (A = area in m<sup>2</sup> per animal, W=weight of the animal in kg). For shorn sheep the formula  $A=0.037W^{0.67}$  applies. This is similar to the recommendations of the Consortium of the Animal Transport Guides Project (2018, p. 27).

For more details, e.g. regarding the space per animal, please see the reports attached in the Annex (Reports of the AWF|TSB-investigations from 2016 to 2019).

*Table 2. Insufficient floor space for the lambs.*

No	Company	Licence plate trailer	Inspection date	Place of departure	Number of animals
1	Erdőhát Transzport Kft.	(H) XYH802	18.03.2016	Bańska Niżna (PL)	700
2	Erdőhát Transzport Kft.	(H) XYC345	30.03.2017	Bańska Niżna (PL)	818
3	Erdőhát Transzport Kft.	(H) XYC343	30.03.2017	Apaj (H)	770
4	Erdőhát Transzport Kft.	(H) XYC346	31.03.2017	Lubosz (PL)	621

5	Rossi Sauro SRL Unipersonale	(H) CL841RC	18.03.2018	Piricse (H)	700
6	Dobrota Trans SRL	(RO) SB65DOB	19.03.2018	Romos (RO)	850
7	Erdőhát Transzport Kft.	(H) XYC345	14.12.2018	Piricse (H)	710
8	Al Kastal Chartering SRL	(RO) CT29CCG	15.12.2018	Crucea (RO)	580
9	Erdőhát Transzport Kft.	(H) XYH801	14.12.2018	Kunfehértó (H)	726
10	Dobrota Trans SRL	(RO) SB10XNU	14.12.2018	Livezile (RO)	520
11	Al Kastal Chartering SRL	(RO) CT75CCC	15.12.2018	Crucea (RO)	580
12	F.LLI Ceccarini SRL	(RO) FN694CB	14.04.2019	Jamu Mare (RO)	550
13	SC Brutaru SRL	(RO) DB48RZV	15.04.2019	Jamu Mare (RO)	790
14	Interexpress	(RO) CJ78GDF	16.04.2019	Valea lui Mihai (RO)	700
15	Erdőhát Transzport Kft.	(H) XYC345	16.04.2019	Kunfehértó (H)	702
16	Autotrasporti Cutilli Di Cutilli Romeo & C.	(I) XA696FA	17.04.2019	Berettyóújfalu (H)	700

- **Violations of Reg. 1/2005:** Art. 3 a), c), g), h); Art. 6.3, 6.4; Annex I, ch. II 1.2; Annex I, ch. VII C
- **Responsibilities:** Competent authority that approved the journey, veterinarian at the place of departure, transporter, transport organiser, attendant/driver<sup>12</sup>, keeper and competent authority at the place of destination.

### c) Insufficient headspace

In all of the documented transports except in the case of transport of the company Interexpress (see [Table 1](#)), often in addition to a lack of sufficient floor area, the space above the lambs was not sufficient<sup>14</sup>. This means not all the lambs were able to stand in a natural position and many of them touched the ceiling with their heads and some also with their backs. In particular the bigger animals with horns did not have enough space above their heads and backs. As mentioned above, such a loading situation also impedes adequate ventilation and significantly reduces the welfare of the animals on board.

A lack of headspace was mainly due to the fact that the animals were loaded on four decks and not only on three decks. During an FVO audit in Romania the practice of loading lambs on four decks was also criticised (European Commission, DG(SANCO) 2010-8389 - MR FINAL, p. 19).

Calculations for the floor area and the space above the animals should be oriented towards the tallest animals and the animals which are not shorn in order to allow for appropriate ventilation. According to a letter of the European Commission in 2011 (SANCO G3 AN/ap D(2011) 86223; Ref. Ares(2011)870575 - 10/08/2011), referring to a report of the European Commission on animal welfare during transport (European Commission, Scientific Committee on Animal Health and Animal Welfare 2002, p. 49) and the Guide to good practices for the transport of sheep (Consortium of the Animal Transport Guides Project 2018, p. 27), **the space above the**

<sup>14</sup> Since the lambs were loaded only on three decks in the case of the transport of the company Interexpress the animals had enough headspace.

head of transported sheep should be at least 15 cm with a forced ventilation system and at least 30 cm without forced ventilation.

- **Violation of Reg. 1/2005:** Art. 3 a), c), g); Art. 6.3, 6.4; Annex I, ch. II, 1.2; Annex I, ch. VII C
- **Responsibilities:** Competent authority that approved the journey, veterinarian at the place of departure, transporter, transport organiser, attendant/driver<sup>12</sup>, keeper and competent authority at the place of destination.

#### d) Not enough feed stuff on board

Except in the case of the transport of the company Interexpress, in all the above-mentioned transports (see Table 1) the animals were loaded on all decks of the road vehicles completely (i.e. on four decks, or in case of road vehicle with a swan neck, on three decks on the swan neck and on four decks on the rest of the road vehicle) and there were no compartments visible which were not loaded with lambs<sup>15</sup>. It is very likely that in all of these cases, due to the loading situation, there was not enough space available to carry a sufficient amount of feeding stuff in relation to the transport duration for the transported lambs.

In order to have the space to carry enough feeding stuff for the animals on board during the journey, a part of the vehicle should be used to carry feed. Even if the animals are unloaded at a control post where feed is provided/can be bought, additional feed for emergency situations should be carried on board of the vehicle.

- **Violation of Reg. 1/2005:** Art. 3 a), h); Art. 6.3, 6.4; Annex I, ch. VI 1.3-1.5
- **Responsibilities:** Competent authority that approved the journey, veterinarian at the place of departure, transporter, transport organiser, attendant/driver<sup>12</sup>.

#### e) Inadequate bedding

In at least five<sup>16</sup> of the transports there was either no bedding, insufficient (which means not enough for not seeing the underneath surface) and/or dirty and wet bedding (see Table 3 below). In these cases, the lambs had no dry place to lie down and rest and in various cases they were covered with faeces and urine from the floor. In one case (Al Kastal Chartering SRL, (RO) CT75CCC, 12/18) shivering animals, which were transported in completely wet bedding despite temperatures below zero degrees, were documented. According to the Consortium of the Animal Transport Guides Project (2018, p. 9 f.), shivering is an animal-based measure (ABM) which is a direct indicator of animal welfare problems.

In order to be considered adequate, bedding material should be dry with a high capacity to soak up fluids. A sufficient amount of clean bedding is necessary for comfort and to facilitate the resting of animals. In addition, adequate bedding makes the floor less slippery which is essential to prevent animals from injuries through slipping (Consortium of the Animal Transport Guides Project 2018, p. 25).

<sup>15</sup> In the transport of the company Interexpress the animals were loaded only on three instead of four decks.

<sup>16</sup> Transports which are not listed in the table below not necessarily had adequate bedding on the vehicle; they are not mentioned because the bedding could not be inspected properly and hence no information on the adequacy of the bedding can be presented here.

Table 3. Inadequate bedding.

No	Company	Licence plate trailer	Inspection date	Place of departure
1	Erdőhát Transzport Kft.	(H) XYC345	30.03.2017	Bańska Niżna (PL)
2	Erdőhát Transzport Kft.	(H) XYC346	31.03.2017	Lubosz (PL)
3	Dobrota Trans SRL	(RO) SB65DOB	19.03.2018	Romos (RO)
4	Al Kastal Chartering SRL	(RO) CT75CCC	15.12.2018	Crucea (RO)
5	SC Brutaru SRL	(RO) DB48 RZV	15.04.2019	Jamu Mare (RO)

- **Violation of Reg. 1/2005:** Art. 3 a), h); Art. 6.3, 6.4; Annex I, ch. VI 1.2
- **Responsibilities:** Competent authority that approved the journey, veterinarian at the place of departure, transporter, transport organiser, attendant/driver<sup>12</sup>.

f) Non-separation of animals

In 14 of the documented cases (see Table 4 below), lambs of different sizes, and/or animals with and without horns were transported in the same compartments and not separated. According to Annex I, ch. III 1.12 of Reg. 1/2005, it is clearly regulated that animals of different sizes as well as animals with and without horns have to be handled and transported separately. Only in cases where animals grew up together and know each other this does not apply. For the correct separation on board of a vehicle, partitions appropriate for the species and size of the animals transported have to be in place.

Table 4. Non-separation of animals.

No	Company	Licence plate trailer	Inspection date	Place of departure	Mix of different sizes	Mix of horned and unhorned
1	Erdőhát Transzport Kft.	(H) XYH802	18.03.2016	Bańska Niżna (PL)	X	X
2	Erdőhát Transzport Kft.	(H) XYC345	30.03.2017	Bańska Niżna (PL)	X	X
3	Erdőhát Transzport Kft.	(H) XYC346	31.03.2017	Lubosz (PL)	X	X
4	Rossi Sauro SRL Unipersonale	(H) CL841 RC	18.03.2018	Piricse (H)	X	
5	Dobrota Trans SRL	(RO) SB65DOB	19.03.2018	Romos (RO)	X	X
6	Erdőhát Transzport Kft.	(H) XYC345	14.12.2018	Piricse (H)	X	
7	Al Kastal Chartering SRL	(RO) CT29CCG	15.12.2018	Crucea (RO)	X	
8	Dobrota Trans SRL	(RO) SB10XNU	14.12.2018	Livezile (RO)	X	
9	Erdőhát Transzport Kft.	(H) XYH801	14.12.2018	Kunfehértó (H)	X	

10	Al Kastal Chartering SRL	(RO) CT75CCC	15.12.2018	Crucea (RO)	X	X
11	F.LLI Ceccarini SRL	(RO) FN694CB	14.04.2019	Jamu Mare (RO)	X	
12	SC Brutaru SRL	(RO) DB48RZV	15.04.2019	Jamu Mare (RO)	X	
13	Interexpress	(RO) CJ78GDF	16.04.2019	Valea lui Mihai (RO)	X	X
14	Erdőhát Transzport Kft.	(H) XYC345	16.04.2019	Kunfehértó (H)	X	

- **Violation of Reg. 1/2005:** Art. 3 a), c); Art. 6.3, 6.4; Art. 8.1; Annex I, ch. III 1.12, 2.5
- **Responsibilities:** Competent authority that approved the journey, veterinarian at the place of departure, transporter, transport organiser, attendant/driver<sup>12</sup>, keeper and competent authority at the place of destination.

#### g) Exceeded maximum journey times

According to the Regulation (EC) No 1/2005 weaned animals can be transported for a maximum of 29 hours and unweaned animals for a maximum of 19 hours. Since it is supposed that in the below-mentioned cases (see Table 5) also unweaned lambs were transported, the journey times of these transports exceeded the legislative limits<sup>17</sup>.

During these transports the animals were not supplied with appropriate liquid or feed at the required intervals. According to the Regulation (Annex I ch. V 1.4), adult sheep have to be supplied with water and if necessary, feed after 14 hours of transport, unweaned lambs after 9 hours.

Despite Article 3 a) of the Regulation the transports documented in March 2017 avoided the fastest route on the highway and used national roads, which caused exceeded maximum journey times. The direct route on the highway would have been faster and more comfortable for the animals than the chosen one.

It has to be ensured that the maximum journey times are not exceeded and that the time the animals have to stay on the road vehicle is minimized. This also means to foresee delays and make sure that all the paperwork is done correctly. Upon arrival at the slaughterhouse, the lambs should be unloaded within 30 minutes (Consortium of the Animal Transport Guides Project 2018, p. 19 f). In case of delays where animals have to stay on the road vehicle for more than two hours, arrangements for their care have to be taken (Art. 22.2. Reg. 1/2005), i.e. they should to be provided with feed and water and possibly also unloaded.

The compliance with the Regulation (EC) No 1/2005 of the maximum permitted journey times must be inspected at the place of destination. Where a competent authority of a place of destination finds that the journey took place in breach of this Regulation, it shall notify without delay to the competent authority of the place of departure (Art. 26. Reg. 1/2005).

<sup>17</sup> Also in case of other transports journey times were possibly exceeded. However, not all of transports have been documented on the whole route and for those transports no information can be provided here.

Table 5. Exceedance of maximum journey times.

No	Company	Licence plate trailer	Inspection date	Place of departure	Total hours transport (inside vehicle)	Total hours journey (incl. stop)
1	Erdőhát Transzport Kft.	(H) XYH802	18.03.2016	Bańska Niżna (PL)	> 25 h	> 25 h
2	Erdőhát Transzport Kft.	(H) XYC345	30.03.2017	Bańska Niżna (PL)	> 28 h	> 28 h
3	Erdőhát Transzport Kft.	(H) XYC346	31.03.2017	Lubosz (PL)	> 25 h	> 25 h

- **Violation of Reg. 1/2005:** Art. 3 a), f); Art. 6.3, 6.4; Annex I, ch. V 1.4
- **Responsibilities:** Competent authority that approved the journey, veterinarian at the place of departure, transporter, transport organiser, attendant/driver<sup>12</sup>, keeper and competent authority at the place of destination.

#### h) Unfit /downer lambs

Unfit or downer animals are animals which are completely exhausted, not able to stand up, and thus incapable of continuing the transport. In the five cases listed below (Table 6), unfit or downer lambs were documented<sup>18</sup>, for details please see the reports attached in the Annex (Reports of the AWF|TSB-investigations from 2016 to 2019). The reason for the bad condition of the lambs might have been the conditions of transport which compromised animal welfare.

According to the documentation of AWF|TSB the unfit lambs were not assisted and did not receive veterinary treatment, which is an infringement of Article 3 in connection with Annex I, chapter I 4 of the Regulation (EC) No 1/2005. Most of the unfit animals were only detected during the inspections of AWF|TSB and not by the attendant/drivers<sup>12</sup> of the animals (see section below: j)). Even in these cases, it was not possible to help all of the downer animals, e.g. through euthanasia, due to inadequate vehicles with an insufficient number of doors to access the animals ((see section below: k)).

The lambs not only have to be inspected for their welfare during the transport, the fitness of the lambs also has to be assessed thoroughly before the transport starts. Weak or injured animals cannot be considered fit for transport (only in case of exceptions as pointed out in Annex I, chapter I 3.) and they have to receive proper treatment (Consortium of the Animal Transport Guides Project 2018, p. 30).

The compliance with the Regulation (EC) No 1/2005 regarding the fitness of the animals upon arrival must be inspected at the place of destination. Where a competent authority of a place of destination finds dead or injured animals, it shall notify without delay to the competent authority of the place of departure (Art. 26. Reg. 1/2005).

<sup>18</sup> This is a selection of transports where unfit/downer lambs were documented; also in other transports there might have been downer animals; however, in some cases it was not possible to inspect all the compartments of a road vehicle.

Table 6. Unfit /downer lambs.

No	Company	Licence plate trailer	Inspection date	Place of departure
1	Erdőhát Transzport Kft.	(H) XYC346	31.03.2017	Lubosz (PL)
2	Dobrota Trans SRL	(RO) SB65DOB	19.03.2018	Romos (RO)
3	Al Kastal Chartering SRL	(RO) CT29CCG	15.12.2018	Crucea (RO)
4	SC Brutaru SRL	(RO) DB48RZV	15.04.2019	Jamu Mare (RO)
5	Erdőhát Transzport Kft.	(H) XYC345	16.04.2019	Kunfehértó (H)

- **Violation of Reg. 1/2005:** Art. 3 a), b); Art. 6.3, 6.4; Art. 15.2; Annex I, ch. I 4
- **Responsibilities:** Competent authority that approved the journey, veterinarian at the place of departure, transporter, transport organiser, attendant/driver<sup>12</sup>, keeper and competent authority at the place of destination.

#### i) Faulty documentation

In at least eight transports (see Table 7) the data indicated in relevant documents was either missing (e.g. the surface area was not entered in the INTRA document in case of Erdőhát Transzport Kft., (H) XYC345, 04/19) or not correct<sup>19</sup>. In several cases the surface area indicated in the documents (certificate of approval of the vehicle or journey log) was higher than in reality (e.g. SC Brutaru SRL, Dobrota Trans SRL). The wrong data was used for the calculation of the number of lambs per road vehicle, which hence had an essential negative effect on the welfare of the transported animals (see section above: b)).

In other cases, the planning was completely unrealistic (e.g. in the case of Interexpress, Prosecco was indicated as a location for unloading the lambs although the control post there is not even approved for lambs). Furthermore, unrealistic information was reported in the journey logs, and tachograph data could not be provided for the whole route (Erdőhát Transzport Kft). In case of the transport of Autotrasporti Cutilli Di Cutilli Romeo & C. (April 2019), the data in the INTRA certificate differed from the data in the journey log (age of the animals, route planning).

It is of utmost importance that the information provided in the documents is realistic. To calculate the surface area which is realistically available for the animals, the thickness of walls and partitions should be deducted. In addition, it has to be taken into account that the available surface of the floors gets smaller from deck to deck (from bottom to top).

In the case of long journeys between Member States for domestic ovine the competent authority of the place of departure shall carry out appropriate checks related to journey log according to the Regulation (EC) No 1/2005.

<sup>19</sup> The documents were not available for all transports. Hence, the table depicts only the transports where an analysis of the documents was possible. It does consequently not mean that the papers of the transports which are not listed in the table were correct.



Table 7. Incorrect documents.

No	Company	Licence plate trailer	Inspection date	Place of departure
1	Erdőhát Transzport Kft.	(H) XYC345	14.12.2018	Piricse (H)
2	Dobrota Trans SRL	(RO) SB10XNU	14.12.2018	Livezile (RO)
3	Al Kastal Chartering SRL	(RO) CT75CCC	15.12.2018	Crucea (RO)
4	Al Kastal Chartering SRL	(RO) CT29CCG	15.12.2018	Crucea (RO)
5	SC Brutaru SRL	(RO) DB48RZV	15.04.2019	Jamu Mare (RO)
6	Interexpress	(RO) CJ78GDF	16.04.2019	Valea lui Mihai (RO)
7	Erdőhát Transzport Kft.	(H) XYC345	16.04.2019	Kunfehértó (H)
8	Autotrasporti Cutilli Di Cutilli Romeo & C.	(I) XA696FA	17.04.2019	Berettyóújfalu (H)

- **Violation of Reg. 1/2005:** Art. 14.1, Art. 18.1; Annex II; Other laws on declaring true/false information
- **Responsibilities:** Competent authority that approved the journey, authority that approved the vehicle, veterinarian at the place of departure, transporter, transport organiser, attendant/driver<sup>12</sup>.

#### j) No inspection of welfare conditions

During the time the below-mentioned transports (see Table 8) were accompanied by AWF|TSB teams, the attendant/drivers<sup>12</sup> did either not at all or only very briefly inspect the lambs on board of the vehicles, or e.g. only one the first deck. In one case (Erdőhát Transzport Kft., (H) XYC345, 04/19), AWF|TSB found out that there was not even a ladder on board of the vehicle to inspect the lambs on the upper decks. Consequently, lambs which were unfit or injured, or stuck with their legs and heads were not detected by the attendant/drivers<sup>12</sup> and hence no action to care for them was taken. Only when teams of AWF|TSB noticed the animals which obviously had problems, the attendant/drivers<sup>12</sup> took action on request of the inspectors (e.g. freed a leg which was stuck between the floor and the side wall).

In addition to not checking the welfare conditions, some attendant/drivers<sup>12</sup> of the below-mentioned road vehicles were handling the lambs very rough, which was for example visible during the unloading. They were screaming and hitting on the trucks, so that the animals which were able to run out of the road vehicle completely frightened and stressed.

Attendant/drivers<sup>12</sup> of the lambs should have a close eye on animal welfare through regular inspections and by taking into account the animal based measures (ABM)/signals they get from the animals (Consortium of the Animal Transport Guides Project 2018, p. 9) and act based on that to improve the welfare. Rough handling has to be avoided and only persons who have knowledge of the behaviour of sheep should handle the lambs on board and during loading and unloading (Consortium of the Animal Transport Guides Project 2018, p. 31).

Table 8. No inspection of the welfare conditions of the lambs.

No	Company	Licence plate trailer	Inspection date	Place of departure
1	Erdőhát Transzport Kft.	(H) XYH802	18.03.2016	Bańska Niżna (PL)
2	Erdőhát Transzport Kft.	(H) XYC345	30.03.2017	Bańska Niżna (PL)
3	Erdőhát Transzport Kft.	(H) XYC346	31.03.2017	Lubosz (PL)
4	Erdőhát Transzport Kft.	(H) XYC343	30.03.2017	Apaj (H)
5	Erdőhát Transzport Kft.	(H) XYC345	16.04.2019	Kunfehértó (H)

- **Violation of Reg. 1/2005:** Art. 3 f); Art. 6.3, 6.4; Annex I, ch. I
- **Responsibilities:** Transporters, transport organisers, attendant/driver<sup>12</sup>.

#### k) Inadequate vehicle design

In the 11 transports mentioned below (Table 9) the vehicles used for the transport of the lambs were inadequate so that the animals could not be transported in line with Article 3 of the Regulation (EC) No 1/2005<sup>20</sup>. In at least ten of the documented transports the gaps between the floor of the decks and the side walls or the tailboard caused a significant risk of danger to the lambs. In five of the transports AWF|TSB documented legs of lambs which were trapped due to large gaps between the floor and the side wall or the tail board of the road vehicles (Erdőhát Transzport Kft. 03/16 plus two transports in 03/17, Dobrota Trans SRL 12/18, F.LLI Ceccarini SRL 04/19). Inadequate partitions are another factor which contributes to a high risk of injury of the transported animals (see section below: l)).

In three of the vehicles (Dobrota Trans 12/18, Al Kastal Chartering SRL 12/18, SC Brutaru SRL 04/19) there were no or not enough side doors to access the animals of all compartments. Such vehicles are not adequate for the transport of live animals. In two of these cases (Al Kastal Chartering SRL, SC Brutaru SRL), there were downer animals which were not reachable for being euthanized due to the lack of access doors. Only transport vehicles with floors which do not cause a risk of getting trapped to lambs should receive a certificate of approval for transporting lambs. Furthermore, there have to be access doors to all compartments in which animals are transported.

Table 9. Inadequate vehicle design.

No	Company	Licence plate trailer	Inspection date	Place of departure
1	Erdőhát Transzport Kft.	(H) XYH802	18.03.2016	Bańska Niżna (PL)
2	Erdőhát Transzport Kft.	(H) XYC345	30.03.2017	Bańska Niżna (PL)
3	Erdőhát Transzport Kft.	(H) XYC343	30.03.2017	Apaj (H)

<sup>20</sup> Transports which are not mentioned in the table not necessarily had an adequate design for transporting lambs; the aspect could just not be documented for every road vehicle in detail. Consequently in at least eleven transports the vehicle design was not appropriate for the transport of lambs.

4	Erdőhát Transzport Kft.	(H) XYC346	31.03.2017	Lubosz (PL)
5	Sc Rovatrans	(RO) GJ30VAS	19.03.2018	Unknown
6	Rossi Sauro SRL Unipersonale	(H) CL841RC	18.03.2018	Piricse (H)
7	Dobrota Trans SRL	(RO) SB65DOB	19.03.2018	Romos (RO)
8	Dobrota Trans SRL	(RO) SB10XNU	14.12.2018	Livezile (RO)
9	Al Kastal Chartering SRL	(RO) CT29CCG	15.12.2018	Crucea (RO)
10	F.LLI Ceccarini SRL	(RO) FN694CB	14.04.2019	Jamu Mare (RO)
11	SC Brutaru SRL	(RO) DB48RZV	15.04.2019	Jamu Mare (RO)
12	Erdőhát Transzport Kft.	(H) XYC345	16.04.2019	Kunfehértó (H)

- **Violation of Reg. 1/2005: Art. 3; Art. 6.3, 6.4; Art. 18.1; Annex I, ch. II, 1.1. a) f)**
- **Responsibilities:** Competent authority that approved the journey, authority that approved the vehicle, veterinarian at the place of departure, transporter, transport organiser, attendant/driver<sup>12</sup>.

#### l) Lacking or inadequate partitions

In the transports listed in below (Table 10), the partitions in the vehicles were not adequate for the type and size of the transported animals<sup>21</sup>. We documented road vehicles with significant gaps between the partitions and the side wall and/or the partitions and the floor which posed a high risk of injury to the lambs. In the transporter of Alkastal Chatering SRL (12/18), there were no partitions at all on the first deck. In another case, the partitions were not properly fixed, which even increased the risk of injury (Dobrota Trans SRL, 12/18). In case of this transport of the company Dobrota Trans SRL, AWF|TSB detected two lambs with their heads stuck between the side wall and the partitions. Also, in a transport of the company Erdőhát Transzport Kft. ((H) XYC345; 03/17) a lamb with the head completely stuck between two compartments due to inadequate partitions was documented.

Partitions should be appropriate for the species transported and their size and without gaps to the side wall or the floor, where animals, in particular small lambs, can get stuck with their heads or legs. Such kind of existing partitions should be properly fixed in order to avoid injuries.

Table 10. Lacking or inadequate partitions.

No	Company	Licence plate trailer	Inspection date	Place of departure
1	Erdőhát Transzport Kft.	(H) XYC345	30.03.2017	Bańska Nižna (PL)
2	Erdőhát Transzport Kft.	(H) XYC343	30.03.2017	Apaj (H)
3	Erdőhát Transzport Kft.	(H) XYC346	31.03.2017	Lubosz (PL)
4	Rossi Sauro SRL Unipersonale	(H) CL841RC	18.03.2018	Piricse (H)

<sup>21</sup> Since there was no possibility to inspect the partitions in all of the road vehicles, the partitions were not adequate in at least 11 of the 17 documented transports.

5	SC Rovatrans	(RO) GJ30VAS	19.03.2018	Unknown
6	Dobrota Trans SRL	(RO) SB65DOB	19.03.2018	Romos (RO)
7	Erdőhát Transzport Kft.	(H) XYC345	14.12.2018	Piricse (H)
8	Al Kastal Chartering SRL	(RO) CT29CCG	15.12.2018	Crucea (RO)
9	Dobrota Trans SRL	(RO) SB10XNU	14.12.2018	Livezile (RO)
10	Interexpress	(RO) CJ78GDF	16.04.2019	Valea lui Mihai (RO)
11	Erdőhát Transzport Kft.	(H) XYC345	16.04.2019	Kunfehértó (H)

- **Violation of Reg. 1/2005:** Art. 3 a), c); Art. 6.3, 6.4; Art. 18.1 b); Annex I, ch. II.1.1 a), d), 1.4; Annex I, ch. VI. 1.7, 1.8.
- **Responsibilities:** Competent authority that approved the journey, authority that approved the vehicle, veterinarian at the place of departure, transporter, transport organiser, attendant/driver<sup>12</sup>, keeper and competent authority at the place of destination.

#### m) Transport of unweaned lambs without special arrangements

The lambs in the below-mentioned transports (Table 11) were either younger than six weeks or looked visually small (< 18 kg) which led to the suspicion that the animals were not weaned yet and thus still on a milk diet. In all of the cases, the unweaned animals were treated as weaned animals. Often, weaned and unweaned lambs were transported together.

One of the main problems in transporting unweaned lambs is that until today, according to the assessment of veterinarians of TSB|AWF, there are no adequate drinking systems available to supply unweaned animals with electrolyte solution or milk replacer on board of a road vehicle. Consequently, the requirements of Annex I, chapter V 1.4 (a) to supply unweaned lambs with liquid after nine hours within a period of one hour of rest cannot be fulfilled.

In regard of the transport of unweaned animals, the European Commission recommends the following (Letter of the European Commission, SANCO D5 DS/dj D (2009) 450351, p. 2): “[...] For practical purposes, lambs could be considered as unweaned under the age of six weeks; Before or during the transport, the competent authority should systematically investigate which arrangements have been made to ensure that animals are offered electrolytes or milk substitutes during the resting period; Metal nipples or troughs should not be considered as being adapted for the drinking of unweaned animals. [...]”

Scientific evidence shows that the transport of lambs with food deprivation is reflected by a decrease in bodyweight and plasma concentrations of glucose, and an increase in plasma concentrations of blood urea nitrogen, creatinine, and total bilirubin compared to “control lambs” (Krawczel et al. 2007). The loss in bodyweight of lambs transported continuously for 22 hours is still significant eight days after transport. Cockram (2007) also reported mobilization of body energy reserves in response to an energy deficiency after 24 hours fasting. So naturally, lambs need to be fed regularly. However, unloading the animals after nine hours and loading them again after the rest period is also associated with stress for the animals and would only be beneficial for the animals with a longer resting period. Based on these facts, the conclusion of AWF|TSB is that lambs which are still on a milk diet should not be transported over long distances.

This request is in line with the resolution of the European Parliament of February 14, 2019 on the implementation of Council Regulation (EC) No 1/2005 on the protection of animals during transport. With this resolution the European Parliament calls on the Member States to reduce the transport of unweaned animals to eight hours in total. In addition, the European Parliament calls on the Commission to define what “unweaned” means and to limit the transport of these type of animals to 1.5 hours and 50 km.<sup>22</sup>

Table 11. Unweaned animals.

No	Company	Licence plate trailer	Inspection date	Place of departure
1	Erdőhát Transzport Kft.	(H) XYH802	18.03.2016	Bańska Niżna (PL)
2	Erdőhát Transzport Kft.	(H) XYC345	30.03.2017	Bańska Niżna (PL)
3	Erdőhát Transzport Kft.	(H) XYC346	31.03.2017	Lubosz (PL)
4	Rossi Sauro SRL Unipersonale	(H) CL841RC	18.03.2018	Piricse (H)
5	Dobrota Trans SRL	(RO) SB65DOB	19.03.2018	Romos (RO)

- **Violation of Reg. 1/2005: Art. 3 h) in combination with Annex I, chapter V, 1.3, 1.4 a), chapter VI 2.2; Art. 6.3; 6.4**
- **Responsibilities:** Competent authority that approved the journey, veterinarian at the place of departure, transporter, transport organiser, attendant/driver<sup>12</sup>, keeper and competent authority at the place of destination.

#### n) Violations of social regulations

In addition to the above-mentioned violations, in various cases infringements of social regulations, e.g. related to the drivers<sup>23</sup> driving times were detected. Such infringements also have to be mentioned here with regard to animal welfare since e.g. drivers<sup>12</sup> which are totally overtired are neither in a position to drive carefully in order to avoid injuries of the animals, nor are they able to properly take care of the animals on board of the road vehicles.

<sup>22</sup> With this resolution, in point 44, the European Parliament “Calls on the Member States to ensure that unweaned animals are unloaded for at least one hour so they can be supplied with electrolytes or milk substitutes and that they are not transported for more than eight hours in total”. In point 45, the Commission to provide a definition of unweaned animal per species, and to limit the journeys of unweaned animals to both a maximum distance of 50 km and a maximum duration of 1.5 hours, given the difficulty of ensuring their welfare during transport” (Source: <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+TA+P8-TA-2019-0132+0+DOC+PDF+V0//EN>.)

<sup>23</sup> In this case the driver is also the attendant/driver. ‘Attendant/driver’ means a person directly in charge of the welfare of the animals who accompanies them during a journey.

### III. Repeated violations

Despite inspections and fines through the police, various repetitions of violations of the Regulation (EC) No 1/2005 were observed in the course of the years from 2016 to 2019 by the same transporter companies. One example is the company Erdőhát Transzport Kft. which in all the years has transported lambs to slaughterhouses in Italy in breach of the Regulation. [Table 12](#) lists the repeated violations of this company.

*Table 12. Repeated violations.*

Violations the company Erdőhát Transzport Kft.	Years	No of transports <sup>24</sup>
Inadequate and/or insufficient drinking devices	2016, 2017, 2018, 2019	6
Inadequate partitions posing a risk to the animals	2017, 2018, 2019	5
Not enough feed stuff on board	2016, 2017, 2018, 2019	7
No, insufficient and/or dirty bedding	2017	2
Insufficient floor space for the animals	2016, 2017, 2018, 2019	7
Lack of headspace	2016, 2017, 2018, 2019	7
Non-separation of animals	2016, 2017, 2018, 2019	6
Journey times exceeded the legislative limits	2016, 2017	3
Unfit/downer lambs	2017, 2019	2
Improper journey log	2018, 2019	2
Welfare conditions not checked	2017, 2019	5
Inadequate vehicle	2016, 2017, 2019	5
Inadequate partitions	2017, 2018, 2019	5
Suspicion of unweaned animals treated as weaned	2016, 2017	3

In addition, between 2016 and 2019, the NGO Animals' Angels also documented breaches of the Regulation (EC) No 1/2005 of eight transports of lambs to Italy of the company Erdőhát Transzport Kft. Though standing out with violations during AWF|TSB and Animals' Angels' investigations, there are also other companies than Erdőhát Transzport Kft. which repeatedly transport lambs in breach of the Regulation (EC) No 1/2005 to Italy for slaughter. For example, the Romanian company Dobrota Trans was fined for transporting lambs in breach of the Regulation (EC) No 1/2005 by the Italian competent authorities in March 2018, but only in December 2018 the company committed the same violations again. The company SC Brutaru SRL from Romania was also documented in breaching the law repeatedly. In 2019, one road vehicle with a broken water system was inspected by TSB|AWF; in addition, four road vehicles of SC Brutaru SRL with an inadequate water system were documented by the NGO Animals' Angels.

<sup>24</sup> In total seven transports of the company Erdőhát Transzport Kft. were inspected by TSB|AWF. In case the number is lower than seven, it does not necessarily mean that the situation was adequate. In some cases, there was for example no opportunity to inspect a certain requirement. Hence, the figure indicates the minimum number of a certain violation.

## IV. Summary and conclusion

### Main infringements and welfare implications

The analysis of the data gathered in the course of investigations carried out between 2016 and 2019 by AWF|TSB shows that the following problems observed in transports of lambs to slaughterhouses in Italy are the main ones negatively affecting the welfare of lambs on board of road vehicles:

- Drinking devices inadequate for lambs, restricted access to water or lack of it
- Not enough feed stuff on board
- Inadequate bedding
- Insufficient space for the lambs (floor area and headspace)
- Non-separation of animals of different sizes and/or with and without horns
- Exceeded maximum journey times
- No inspection of welfare conditions
- Transport of unfit/downer lambs
- Transport of unweaned lambs without special arrangements (road transport vehicles not equipped with watering system suitable for this category of transported animals)
- Inadequate vehicle design
- Dangerous partitions
- Faulty documentation

Animals which are not provided with adequate liquid and feed, which have no possibility to rest (due to too high loading densities or a lack of bedding), which are not separated properly, and are transported in vehicles totally inadequate for lambs (e.g. due to large gaps between the floor and the side wall) – to name just some of the documented welfare problems – cannot be considered to be transported in line with Article 3 of the Regulation (EC) No 1/2005 which says that:

*“No person shall transport animals or cause animals to be transported in a way likely to cause injury or undue suffering to them.”*

A large share of this suffering is caused by the fact that the animals are loaded on four decks instead of on three decks only. While it would be important to transport lower numbers of animals on only three decks of a road vehicle, the economic incentive to load as many animals as possible on one road vehicle is put before the welfare of the transported animals.

According to the assessment of AWF|TSB, the problems observed in transports of lambs on the route to Italy are not incidental in nature, but regular, since the infringements were observed in every inspected road vehicle. In case of inspections with the police and official veterinary authorities in Italy, the infringements of the Regulation (EC) No 1/2005 were officially confirmed and fines for the breaches were imposed, also regarding violations of drivers' social regulations.

One of main concerns of AWF|TSB besides direct animal welfare problems, is the fact that despite inspections performed by authorities and fines imposed by them, repetitions of various violations of the Regulation (EC) No 1/2005 by the same transporter companies were observed in the course of four years of investigations, and no measures have been taken by these or other competent authorities to solve the problem efficiently.

## Responsibilities and failures on various levels

Besides the fines imposed by the police, AWF|TSB sent letters of complaint and information to the National Contact Points of the European countries involved in the trade of lambs. In addition, the European Commission has been informed about the regular violation of the Regulation (EC) No 1/2005 during the transport of lambs for slaughter. However, until today, the conditions of lambs transported for slaughter remain poor and improvements of animal welfare are urgently needed.

The violations of the Regulation (EC) No 1/2005 occur at different levels under the responsibility of different parties. The infringements are related to the planning of journeys and their approval, as well as the approval of inappropriate vehicles for the long-distance transport of lambs. In addition, infringements are related to loading and transport conditions, i.e. the direct handling of the animals, for which keepers, transporters and attendant/drivers<sup>12</sup> are responsible. Furthermore, transporters and transport organizers are responsible for the welfare of the transported lambs during the whole journey.

Problems at the stage of approval of vehicles and long journeys are also confirmed by the results of an audit carried out in Hungary by the Directorate-General for Health and Food Safety of the European Commission in 2017 (European Commission, DG(SANTE) 2017-6099): *“The poor standard for approval leads to a risk of inadequate space allowances and unsuitable drinking devices, during long journeys and thus to welfare problems for the animals transported. The inadequate measuring of deck floor surface areas and assessment of drinking devices at the time of approving the vehicle leads to incorrect calculations on stocking densities – as they are based on the deck surface area indicated in the vehicle approval certificate.”*

Furthermore, according to the observation of AWF|TSB, the suffering of animals is related to the fact that certificates of vehicle approval are issued for vehicles which are not even appropriately designed for the species. Besides inadequate drinking devices, this includes a lack of lateral protection on the floor (and thus lambs’ legs can easily get trapped between the floor and the wall), as well as lack of doors to access the animals. Such factors can easily be checked when approving the vehicle and the transport.

Many problems are also related to the direct handling of the lambs, like the loading or unloading of animals, taking care of injured animals or providing adequate rest and bedding, feed and water to them. To this end, attendant/drivers are needed, who are trained and have experience in handling the transported species and category of animals.

The main responsibility regarding the transport lies in the hands of the transport organiser and the transporter. However, as pointed out above, documentations of AWF|TSB show that in many cases economic considerations seem to play a larger role than the welfare of the animals from which the transporters profit.

The fact that neither police fines, nor official complaints have led to significant improvements, shows that there is a general problem of enforcement of the Regulation (EC) No 1/2005 and that Article 25 (Penalties) is not being complied with:

*“The Member States shall lay down the rules on penalties applicable to infringements of the provisions of this Regulation and shall take all measures necessary to ensure that they are implemented. The penalties provided for must be effective, proportionate and dissuasive”.*

The problems in this regard start with the fact that the authorities at the place of destination frequently do not inform the competent authorities at the place of departure about infringements found, and they continue with the failure to implement measures to remedy the breaches or prevent the recurrence of infringements according to Article 26 (Infringements and notification of infringements).



The lack of notifications between the member state of destination and the member state of departure contributes clearly to the situation of non-enforcement of the Regulation.

Hence, authorities need to take the enforcement of the Regulation (EC) No 1/2005, as well as the protection of animals during transport –the actual goal of the Regulation – seriously. In addition, more inspectors are needed, and fines imposed should be related to the additional profit gained by breaking of the law and should constitute a noticeable loss for the organizers and transport companies.

In the resolution of February 14, 2019 on the implementation of Council Regulation (EC) No 1/2005 on the protection of animals during transport, the European Parliament calls on the European Commission to shift from transporting live animals to the transport of meat and carcasses<sup>25</sup>. Until this call is put into practice and makes long-distance transports obsolete, AWF|TSB will continue to work on improving the conditions of transported animals, among other things, on improving the welfare of lambs transported over long distances to slaughterhouses in Italy.

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<sup>25</sup> *With this resolution, in point 53, the European Parliament “Calls on the Commission to develop a strategy to ensure a shift from live animal transport to a mainly meat-and-carcass and germinal products trade, given the environmental and animal welfare and health impacts of live animal transport; [...]”*  
 (Source:<http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+TA+P8-TA-2019-0132+0+DOC+PDF+V0//EN>).

## V. Annex

### Media coverage

#### 2019

- TSB|AWF: YouTube, English version: [https://www.youtube.com/watch?v=xn2R5WJyr\\_8](https://www.youtube.com/watch?v=xn2R5WJyr_8)
- Italian media: <https://www.corriere.it/video-articoli/2019/04/19/sull-altro-senza-accesso-all-acqua-2-mila-km-agonia-agnelli-prima-finire-macello/a8d92d0c-62bf-11e9-a7fc-361228882fb7.shtml>
- Eurogroup for Animals: [https://www.eurogroupforanimals.org/animal-welfare-foundation-cruelty-to-transported-lambs-to-italy-during-easter-continues?fbclid=IwAR1FJKIczPLABn\\_wgoepxsZ7mZHn0GVrpwWrWKAoksU5BKU3f6GRc\\_nW4GQ](https://www.eurogroupforanimals.org/animal-welfare-foundation-cruelty-to-transported-lambs-to-italy-during-easter-continues?fbclid=IwAR1FJKIczPLABn_wgoepxsZ7mZHn0GVrpwWrWKAoksU5BKU3f6GRc_nW4GQ)
- Romanian media: <https://direct.oradesibiu.ro/2019/04/25/video-foto-mieii-de-pasti-exportati-din-romania-in-conditii-groaznice-sunt-torturati-inainte-de-sacrificare/>
- Polish media: <https://wroclaw.tvp.pl/42536413/08052019>

#### 2018

- TSB|AWF: YouTube English version: <https://www.youtube.com/watch?v=xdZv6L0Yi64>
- AWF|TSB with Animal Equality Italia: YouTube, Italian version: <https://www.youtube.com/watch?v=DVe-jYgDvyU&feature=youtu.be>
- Romanian Media : [https://adevarul.ro/locale/resita/video-amenda-colosala-incasata-sofer-roman-italia-barbatul-fost-gasit-transportand-miei-conditii-barbere-1\\_5c1cbc8adf52022f75bb5484/index.html](https://adevarul.ro/locale/resita/video-amenda-colosala-incasata-sofer-roman-italia-barbatul-fost-gasit-transportand-miei-conditii-barbere-1_5c1cbc8adf52022f75bb5484/index.html)
- Italian media:
  - Youtg.Net: <https://bit.ly/2T6iX3R>
  - Amore a quattro zampe: <https://bit.ly/2Ad70CG>
  - Quotidiano.net: <https://bit.ly/2GEahjW>
  - LaPresse: <https://bit.ly/2VfaRYW>
  - Yahoo Notizie: <https://yhoo.it/2GBcxZl>
  - La Quota Vincente: <https://bit.ly/2T70AMm>
  - TPI: <https://bit.ly/2An8339>
  - The Social Post: <https://bit.ly/2ERFDSr>
  - Telecolor: <https://bit.ly/2rZP3Tn>

#### 2017

- TSB|AWF: YouTube
  - German version: <https://youtu.be/nOXr0YYzr8w>
  - English version: <https://youtu.be/kkmTLsG1goQ>
  - Polish version: <https://youtu.be/OzQQIKqK76Y>

#### 2016

- German Media: Report on ARTE of a journalist who accompanied the team during the trailing:
  - French version: <http://info.arte.tv/fr/toutou-sur-les-genoux-ou-dans-lassiette>
  - German version: <http://info.arte.tv/de/schosshuendchen-oder-nutzvieh-tierschutz-europa>

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Analysis of information from journey logs and SNS data: March 2018

Table 13. Place of origin: Korycin (ca : PIW Sokółka); 2000 km to Acquapendente.

Transport particulars: date, company, INTRA	Number of animals	Route planning vs reality	Problems
22.03.2018 P&P Trading, (PL) PK96768 INTRA.PL.2018.0003536	611 on 132.4m2 = 0.22 m2/animal Est. weight: 11300 / 611 = 18.50kg average animal	<u>Plan</u> : 28h (22.03 15:00 – 23.03 20:00) <u>Reality (JL)</u> : 1 <sup>st</sup> animal loaded: 22.03 14:00 Rest: Dobre Pole (CZ) 23.03 05:00-06:00 (after 15h of transport) Last animal unloaded: 23.03 18:30 Total: 28.5h Driving time: 25h (JL); 2000 km (SNS) = 80km/h average	Discrepancies in data in SNS, and between SNS and JL.

Table 14. Place of origin: Skowrony (ca: PIW Elbląg); at least 1950 km, if via Austria.

Transport particulars: date, company, INTRA	Number of animals	Route planning vs reality	Problems
19.03.2018 Animex-Trans, (PL) WL7655A INTRA.PL.2018.0003434	473 on ??m2 = ? m2/animal (surface not provided)	<u>Plan</u> : 29h (19.03 20:00 – 21.03 01:00) <u>Reality (JL)</u> : Departure: 19.03 19:00 Rest: Hazlach(CZ): 20.03 04:15-05:15 Arrival in destination: 20.03 23:55 <u>Total</u> : 9h+1h pause+>18h! <u>Driving time</u> : 29h (JL); 2000 km (estimate) = 70km/h average	- Section 3, point 4.5 marked as OK, although times were exceeded - Section 3, point 4.4 marked as OK, although surface was not provided - discrepancy between section 2 and 4 of JL reg. departure time (19:00 as hour of loading in S2 and as time of departure in S4). - incomplete S1
23.03.2018 P&P Trading, (PL) PWL3V22 INTRA.PL.2018.0003724	605 on 120,6m2 = 0.2 m2/animal Est. weight: 14200 / 605 = 23.47kg average animal	<u>Plan</u> : 29h (23.03 23:30 – 25.03 04:30) <u>Reality</u> : 1 <sup>st</sup> animal loaded: 23.03 22:30 Rest1: Gorzyczki (PL) 24.03 12:30-13:30 Rest2: Undine (IT) 25.03 00:15-01:15 Last animal unloaded: 25.03 11:00 Total: 36.5h!	- Section 3, 4.5 marked as OK, although 29h was exceeded

Table 15. Place of origin: Lubosz (ca: PIW Międzychód); 1820 km to Acquapendente.

Transport particulars: date, company, INTRA	Number of animals	Route planning vs reality	Problems
14.03.2018 Animex-Trans, (PL) WL0728C (PL) WL7656A INTRA No. not provided	508 on 93.6m <sup>2</sup> = 0.18 m <sup>2</sup> /animal Est. weight: 12977 / 508 = 25.54kg average animal. <b>For sheep from 26kg up there should be 0.2 m<sup>2</sup> at least.</b>	<u>Plan</u> : 29h (14.03 19:00 – 15.03 23:00) <u>Reality</u> : 1 <sup>st</sup> animal loaded: 14.03 18:00 Rest: Redics(HU): 15.03 03:30-04:35 Last animal unloaded: 15.03 22:00 <u>Total</u> : 28h <u>Driving time</u> : 25h (JL); 1820 km (estimate) = 73km/h average	Section 1, art. 6.4 – transporter name not provided
17.03.2018 P&P Trading, (PL) PWL2U58 (PL) WPR 48987 INTRA No. not provided	520 on 99m <sup>2</sup> = <b>0.19 m<sup>2</sup>/animal</b> Est. weight: 14031 / 520 = 26.98kg average animal. <b>For sheep from 26kg up there should be 0.2 m<sup>2</sup> at least.</b>	<u>Plan</u> : 29h (17.03 17:00 – 18.03 22:00) <u>Reality</u> : 1 <sup>st</sup> animal loaded: 17.03 16:00 Rest: not specified in JL Last animal unloaded: 19.03 00:30 <u>Total</u> : <b>32.5h</b> <u>Driving time</u> : 29.5h (JL); 1820 km (estimate) = 73km/h average	- Section 3, point 4.4 marked as OK, although insufficient surface per animal - Section 3, point 4.5 marked as OK, although 29h was exceeded - 4 animals dead - temp. in place of origin: <b>-2C</b> , windy <a href="https://www.worldweatheronline.com/daleszynek-weather-history/pl.aspx">https://www.worldweatheronline.com/daleszynek-weather-history/pl.aspx</a>
21.03.2018 P&P Trading, (PL) PK3289E, (PL) PWL9V07 INTRA No. not provided	513 on 121m <sup>2</sup> = 0.24 m <sup>2</sup> /animal Est. weight: 11561 / 513 = 22.54kg average animal.	<u>Plan</u> : 29h (21.03 18:00 – 22.03 22:00) <u>Section 4 of JL</u> : 1 <sup>st</sup> animal loaded: 21.03 18:00 Rest: Kufstein (A): 22.03 04:00-05:00 Last animal unloaded: 22.03 17:00 <u>Total</u> : 23h <u>Driving time</u> : 21h (JL); 1600 km (estimate) = 76km/h average Section 2: 1 <sup>st</sup> animal loaded: 21.03 17:00 Provided <u>SNS data</u> not complete, but show that on 21.03 at 18:00 the vehicle was 185km from place of origin	- Section 1, art. 6.4 – transporter name and rests not provided - discrepancy between section 2, section 4 and SNS

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- Consortium of the Animal Transport Guides Project (2017-rev1). Revision May 2018. 'Guide to good practices for the transport of sheep'; <http://animaltransportguides.eu/wp-content/uploads/2016/05/D3-Sheep-Revised-Final-1.pdf>
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### Letters of the European Commission

- Letter of the European Commission on the Internal height of means of transport for animals (2011); Ref. Ares(2011)870575-10/08/2011; SANCO G3 AN/ap D(2011) 86223; [http://www.trovanorme.salute.gov.it/normsan-pdf/0000/39623\\_1.pdf](http://www.trovanorme.salute.gov.it/normsan-pdf/0000/39623_1.pdf)
- Letter of the European Commission on the transport of unweaned calves and lambs on long journeys (2009); SANCO D5 DS/dj D (2009) 450351; <https://vgt.at/presse/news/2016/bilder/dg-sanco-2009en.pdf>

### Other Sources/Links

- Council Regulation (EC) No 1/2005 of 22 December 2004 on the protection of animals during transport and related operations and amending Directives 64/432/EEC and 93/119/EC and Regulation (EC) No 1255/97 <https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32005R0001> (in different languages)
- European Parliament resolution of 14 February 2019 on the implementation of Council Regulation (EC) No 1/2005 on the protection of animals during transport within and outside the EU (2018/2110(INI)) <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+TA+P8-TA-2019-0132+0+DOC+PDF+V0//EN>

## Reports of the AWF|TSB-investigations from 2016 to 2019

1. External report: Transport of lambs from Poland to Italy, (H) XYH 802, 18.-19.03.2016
2. External report: Transport of lambs from Poland/Hungary to Italy, (H) XYC 345, (H) XYC 346, (H) XYC 343, 30-31.03.2017
3. External report: Transport of lambs from Romania/Hungary to Italy, (RO) SB 65 DOB, (H) AE 70978 18-19.03.2018
4. External report: Transport of lambs from Hungary to Italy, (H) XYC 345, 14.12.2018
5. External report: Transport of lambs from Romania to Italy, (RO) SB 10 XNU, 14.12.2018
6. External report: Transport of lambs from Romania to Italy, (RO) CT 29 CCG, 15.12.2018
7. External report: Transport of lambs from Romania to Italy, (RO) CT 75 CCC, 15.12.2018
8. External report: Transport of lambs from Romania to Italy, (RO) DB 48 RZV, 15.04.2019
9. External report: Transport of lambs from Hungary to Italy, (H) XYC 345, 16.04.2019
10. External report: Transport of lambs from Hungary to Italy, (I) XA696FA, 17.04.2019