

Production of horsemeat in Argentina

June 2017



A follow-up investigation carried out by



supported by



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I. Introduction

Tierschutzbund Zürich and Animal Welfare Foundation have been documenting the cruel production of horsemeat in Argentina since 2012, with a focus on slaughterhouse Lamar near Buenos Aires. Between February 2013 and June 2014, all Swiss supermarkets reacted and stopped selling horsemeat from overseas, including Argentina; several retailers in the Netherlands and Belgium followed their example. One of Dutch supermarket chains, Jumbo, even carried out their own audit in Argentina in 2014. They also found the conditions at Lamar to be unacceptable and immediately stopped purchasing meat from that plant.

In April 2014, the inspection company SGS withdrew their certification for Lamar, based on violations of animal welfare shown in the media. However, later Lamar was re-audited and re-certified by SGS for animal welfare – by order and for account of the Swiss importers – and the certificate remains valid until the present day.

Currently, EU and Swiss horsemeat importers are trying to make horsemeat from South America acceptable again. They have created a “research” project called Respectful Life¹ and have entrusted the Catholic University of Leuven (KU Leuven) with audits. One of these audits was carried out at Lamar in November 2016, just one month before our own visit. In KU Leuven’s audit report, no “unacceptable violation of the welfare of the animals” were found. Nevertheless, “recommendations were made on how to deal with wounded animals. On arriving at the slaughterhouse, these animals should be isolated, inspected and where needed slaughtered without delay”². In December 2016, we returned to Lamar in order to assess if improvements had been done. However, the conditions were as bad as in the previous years, if not even worse. Once again, the personnel were unprofessional and handled the horses very roughly. They beat the horses in the pens and alleys, splashed strong water jets into their faces. Many horses were in a deplorable condition: injured, lame, weak, sick, very thin or severely emaciated. On every single day, we saw seriously injured horses that were unfit for transport according to EU standards and should never have been transported to the slaughterhouse in the first place. Or, if the injury had happened during transport, they should have been emergency killed right upon arrival. At Lamar however, they were left in the waiting pens for several days before being relieved from their suffering (see our report “Production of horsemeat in Argentina, 2015 & 2016”).

Our findings are very different from the above-mentioned audits of the KU Leuven and SGS, this is certainly because our investigations are unannounced and covert. Announced audits will never show everyday business because the slaughterhouse has plenty of time to “tidy up” before the auditors arrive. Even if audits were unannounced, they would not show the everyday treatment of the horses because the employees would know that they are under observation and would act differently.

The audit team of the project Respectful Life paid further visits to Lamar in the first half of the year 2017, and we returned at the end of June in order to see if the handling of the animals, especially of the injured ones, was any better. We wanted to see if the promises to improve the situation, made by European and Swiss horsemeat importers, have had any positive impact. Besides Lamar, we also paid visits to the slaughterhouses Entre Rios, which was shut down, and General Pico, where it was difficult to film because of presence of the police. The conditions found at Lamar and General Pico are unchanged. German equine veterinarians, whom we showed the footage from Lamar, were concerned by the horses’ poor condition and the fact that even unfit horses were transported and accepted for slaughter. In addition to serious animal welfare concerns, consumer safety is at risk, as identification with ear tags is an unreliable means of traceability, as described in this report.

¹ <http://www.respectfullife.com/>

² <http://www.respectfullife.com/our-research/missions-en-reports/>

II. Observations

1. Slaughterhouse Lamar

Address:

Frigorífico Lamar
 Ruta 5 km 93
 Mercedes
 Provincia de Buenos Aires

EU approval number: 1451

Thursday, 22.06.2017

It is dark and quiet when we arrive at the slaughterhouse Lamar early in the morning. Activities start shortly before 6:00, when it is still dark. The lairage area is crowded with horses. An employee starts hosing them down with water, a procedure that we have already observed during previous visits. Other employees move the washed horses in groups of eight to ten from the lairage into a small pen by the entrance to the stunning chute. From there, they usher the horses in small groups of three to five into the stunning chute, which is separated from the pen by a trap door. As soon as the animals enter the stunning chute, they disappear from our view. In the first group of horses that are moved into the building, **one animal is so scared that he rears up**. Slaughter begins around 6:00. Smoke and bad odour start coming out of the slaughterhouse. We can hear **loud banging inside the plant, which must frighten the horses**.



Horses being moved towards the stunning chute – one rearing up in panic

We estimate that there are more than 200 horses in total. There are three different areas where we see horses today:

1. Lairage area with concrete floor, partly roofed
2. Small holding pens with dirt/mud ground and **no shelter** (used to be partly covered by a fabric roof)
3. Large paddocks with dirt/mud ground and **no shelter**



Different areas where horses are kept before slaughter

The handling of the horses is as **unprofessional and rough**, like during our last visit in December 2016. The employee who is hosing down the horses in the lairage area is observed **spraying water also on their faces**. The horses are **very agitated and try to escape the strong water jet**.



Hosing down horses in the lairage



Water jet aimed at horses' heads

The employees use yellow flags to move the horses. In the small pen by the entrance of the stunning chute, one or two employees are **hitting the horses with their flags**, often several times in succession, to make them enter the stunning chute. Most horses are **frightened and reluctant to enter the building** and some are hit frantically. Many are **even repeatedly hit on their heads** when being forced into the stunning chute.



Employees hitting horses on their heads

A grey horse is hit in its face by the entrance of the stunning chute, although the trap door is closed. Another employee hits the same horse in its face just before opening the entrance door of the stunning chute. It is **unacceptable that horses are hit, also on their heads, for no reason at all**. Later, an employee **lowers the trap door on a horse's back**, who then walks backwards out of the stunning chute. Shortly after, the same horse is hit on the head for no reason.

A group of horses that refuse to enter the stunning chute are repeatedly hit on their heads. When they finally enter, the employee cannot close the trap door, as one horse is standing underneath, and **keeps hitting frantically the last horse in line**. The horse still does not move forward, probably because its way is blocked by other horses, so the employee **flips his flag over and repeatedly pokes the animal in its hindquarters with the stick**. He then continues hitting the horse until he can close the door.

Later in the morning, an employee unsuccessfully tries to move horses into the stunning chute by **hitting them fiercely, including their heads**. A black horse is **in panic, its whole body shaking**. Some horses of the group finally enter the chute, while three animals, particularly reluctant to enter the slaughterhouse, stay in the small pen at the entrance. The employee keeps hitting them for almost a minute. He seems helpless and at one point he walks away. Another employee is observed moving more horses from the adjacent holding pens into the lairage area. He is hitting the last horses in line with his flag, frightening them. Soon after, the first employee is back at the entrance of the stunning chute and resumes hitting the three reluctant horses, but again without success. He **flips his flag over and hits a horse on the head with the stick**. The horses still do not enter. He then opens the pen gate and keeps hitting the horses from the side, but he does not dare to enter the pen. The employee seems to have no professional experience in handling horses. After a while, a colleague comes to assist him and enters the pen. They **both thrash the reluctant horses until they finally enter the stunning chute**. The animals are stressed out. It took the employees **more than five minutes** to move these three horses into the stunning chute. They are **obviously not very skilled at moving horses**.

Later, two employees are again observed hitting a group of horses by the entrance of the stunning chute, also on their heads. The animals refuse to enter the chute and panic, two of them **jump against the pen gate in a desperate attempt to escape**.



Two employees thrashing reluctant horses

Horse jumping against gate when trying to escape

Even from the distance, we can see that several horses are in a poor condition. A chestnut moved from the lairage area towards the stunning chute is **severely lame in a front leg** and moving his head up and down when walking. A grey horse in the lairage area is **extremely emaciated** with prominent hip bones and spine; two other grey horses we later observe being moved into the stunning chute are in a similar condition. It has to be noted that in the EU, severely emaciated horses are not considered to be fit for slaughter for human consumption (see chapter III page 25).



Severely emaciated horses

A white horse in the lairage area has a **bleeding injury on the forehead**, likely from transport. In Argentina, **cattle trucks are used to transport horses and their trap doors are much too low**, causing head injuries. Later, we spot a second white horse in the lairage area with a bleeding head injury. There might be many more horses with such injuries, but from the distance they are detected more easily on white horses. We have seen such head injuries many times in the past, and we know they are a consequence of transporting horses in cattle trucks.

A bay horse that is moved into the stunning chute is in **very poor condition, emaciated and with a curved back, which can indicate pain**. A black and white horse in the lairage area has a **thin metal wire tied through its mouth**, to keep him from biting. Its ears are constantly turned backwards and it is very likely that the animal is in pain.



Horse with bleeding head injury



Horse with wire tied through his mouth

At 9:00, a chestnut severely lame in the left hind leg is observed hobbling away from an employee who tries to hose him down with water. Instead of being emergency slaughtered and released from suffering immediately upon arrival at the plant, the **injured animal is chased around in the waiting pen to be washed**. After being hosed down, the animal is moved towards the stunning chute, three hours after the start of slaughter. **It becomes evident that the plant does not identify priorities**, in particular by determining which animals have specific welfare needs, and what corresponding measures should be taken. There are apparently no isolation pens for animals that require specific care. The way the chestnut walks suggests that he **can hardly bear any weight on the injured leg, and definitely is in pain, so should have been emergency killed upon arrival**.



Overcrowded pens in the front & empty pens in the back

The horses in the waiting pens of the lairage are **overcrowded, stressed and bite each other**. It is unacceptable that the pens are so crowded, as there are many empty pens in the back of the lairage area. We observe a large group of horses being moved from one pen into another, for no apparent reason. The animals are very agitated, some **panic and jump on the others** in a desperate attempt to get away from the employee. Later, we observe another group of horses being moved out of the waiting pen. **One of them falls, which is not surprising, as the pen floor is wet from hosing down the horses and must be very slippery.**



Horse biting others in crowded pen



Horse in panic trying to flee from employee

The small holding pens next to the lairage area, which were partly roofed with a green fabric in December, now offer no weather protection at all. The **fabric roof has come down completely and not been replaced**. These pens are crowded as well, and there seems to be no feed available, as none of the horses are observed eating. Two horses are kept in separate pens. **Neither has any feed available**. One of them has **overgrown, neglected hooves** and wears an ear tag. The other is **well-fed and well-groomed and has no ear tag**. We wonder if he is one of the many stolen horses that get into the slaughter chain (thus explaining the lack of ear tag). However, it is important to note that **many stolen horses also get into the slaughter circuit with falsified documents and ear tags³**.

³ In 2013, we published a report in German about slaughter of stolen horses in Argentina: "Hehlerware Pferdefleisch aus Argentinien"



Crowded pen with torn-down fabric roof

At 9:00, a herd of horses is moved into large paddocks behind the slaughterhouse and it is very likely that they have just been unloaded. About 10 minutes later, a second group of horses is moved into these paddocks. We leave the plant at noon, as it starts raining heavily. Like in the years before and despite our numerous complaints, the **large paddocks still offer no shelter from sun and rain.**

Friday, 23.06.2017

When we return to Lamar at 9:30, slaughter is underway, as shown by the smoke that is coming out of the buildings and the loud banging. Horses are moved in small groups into the slaughterhouse. As on the previous day, they are **hit on their heads with flags, sometimes by three employees at the same time, to be forced into the stunning chute.** The animals are very frightened.

Today we again see horses in the lairage, the adjacent holding pens and the large paddocks, and estimate that there are around 130 horses when we arrive. It must be assumed that a large part of the horses has already been slaughtered since early morning. There are only a few groups left in the lairage area, approximately 40 animals, which all wear ear tags.

A person dressed in white is observed taking notes, standing by the entrance of the stunning chute. He might be the **responsible veterinarian or animal welfare officer.** The other employees do not wear uniforms. Later, we see this person **hitting the horses, including on their heads.**

There are two groups, each of about 35 horses, in the adjacent holding pens, which used to be partly covered by a green fabric roof and now offer no shelter at all. The animals are **overcrowded, while all pens around them are empty.** A bay horse is observed **kicking another one, and some are biting each other.** These horses also wear ear tags.



Smoke coming out of slaughterhouse & pens without shelter

There is only one group of horses in the large paddocks behind the slaughterhouse, consisting of **23 animals**. As opposed to the horses in the lairage, **none of them have ear tags**, but they have the brand mark “F” on their right hindquarters, meaning “Faena” (slaughter), so are clearly destined for slaughter. We later witness that they receive ear tags at the slaughterhouse. The majority of these horses are neglected and in poor condition. **Three of them are in such a bad condition that they should have never been transported** to the slaughterhouse in the first place, as they are unable to move without considerable pain and must therefore be considered unfit for transport. **Another horse has a fresh, gaping wound on one leg, which has likely occurred during transport, and should have been emergency slaughtered immediately upon arrival** in order to avoid further suffering. A thin bay horse, a chestnut and a pinto gelding are lame as well. Lameness indicates that the horse is experiencing pain and discomfort and may be the result of several clinical conditions. A small white mare has a wound at the withers. A lot of horses in this group have severely neglected hooves that are overgrown and/or with hoof cracks. Neglected hooves can be painful themselves, but also cause discomfort when walking and may cause pain in other regions of the limb.

Back in Europe, we show the footage of this herd to **two German veterinarians** for assessment. Claudia Eggert worked for 15 years as an official veterinarian in a slaughterhouse in Germany, where she supervised horse slaughter. Petra Ohnemus is an equine veterinarian, working at the renowned horse hospital “Pferdekllinik an der Rennbahn” in Iffezheim. According to both veterinarians, most horses in this group are in a miserable condition. **Many are emaciated and totally neglected, in particular the hooves. Several show signs of pain and are clearly lame.** Three horses (see their description below) are obviously in **severe pain**, from which they should be released immediately. They are **unfit for transport and should have been euthanized on the spot to avoid further suffering.**

A **black-grey mare** is first seen laying down on the manure-covered floor and appears to be exhausted. When she is later seen walking, it becomes evident that she is **lame and experiencing pain**. She looks severely neglected; her long mane is matted, the hoof of her left front leg is overgrown and she is **emaciated with her ribs clearly visible and sunken flanks**. The mare is later observed standing motionless away from the herd, with an abnormal posture that indicates pain.

According to Dr. med. vet. Eggert, **pain is indicated** by her **forced breathing, dilated nostrils and turned-back ears, as well as her trembling hind leg** when she stands still. The mare is lame in her right hind and left front leg. She is **unfit for transport**. Moreover, because of her **impaired general condition and severe emaciation, she should not be considered fit for slaughter for human consumption.**



Weak mare showing clear signs of pain: dilated nostrils, ears turned back, trembling hind leg

A grey stallion is severely lame in the right hind leg, where the fetlock is heavily swollen. He has a wound on the inner side of the fetlock and bears minimal weight on the injured leg.

According to Dr. med. vet. Eggert, it is an **old wound and a chronic inflammation, as shown by the reduced musculature of the injured leg**. The swelling is extreme and expands from the fetlock up to the hock. If old wounds are located in the lower leg sections, pyogenic (pus-forming) microorganisms are often involved. Because the injury has happened some time ago, **germs can be expected to be in the bloodstream** and the stallion must **not be considered fit for slaughter for human consumption**.



Stallion with severe inflammation and muscle atrophy in right hindquarters

An **extremely emaciated black mare has a strongly deformed hoof**. Likely as a result of an old injury, the hoof of the left hind leg has grown backwards. The mare has great difficulty walking. She is **severely limping** and the pelvis raises as the lame hind leg hits the floor. The hoof is completely turned backwards and the mare **walks on the front hoof wall and coronary band**.

According to Dr. med. vet. Ohnemus, the mare has probably a fracture in the middle phalanx and as a result the hoof has folded back. This horse is not fit for transport and **should have been euthanized on the spot instead of being transported to the slaughterhouse**.



Emaciated mare with deformed hoof, walking on the coronary band and hoof wall

This group of horses is not slaughtered today and it is very unlikely that they will be slaughtered over the weekend. **Transporting the three unfit animals to the slaughterhouse and leaving them unattended over a longer period in the waiting area is a clear and blatant violation of animal welfare** (see chapter III page 29). In addition, their meat might pose a health risk to consumers, as in the EU these horses would not be slaughtered for human consumption according to Regulation 854/2004 (see chapter III page 24).

According to Dr. med. vet. Eggert, the grey stallion would **not be approved for slaughter for human consumption in the EU because of severe, widespread inflammation**, and the two mares described above **because of extreme emaciation (cachexia)**⁴.

These are cases of animal cruelty and would constitute a **criminal offence in Europe**, as the three horses are **seriously neglected, unfit for transport and slaughter**. In Germany, the official veterinarian would report these cases to the public prosecutor's office in order to file a **criminal complaint against the keeper of the animals, the transporter and the slaughterhouse operator**.

In the same group of horses, we spot a dark-bay gelding that has a **fresh, gaping wound at the bulb** of the right front leg. Some flesh is loosely hanging down to the ground. This injury could have been caused by the metal grid that covers the floor of Argentinian livestock trucks. When the grid is broken, it has sharp protrusions and thus presents a high risk of injuries. Furthermore, this horse has been transported with horse shoes on, which poses a risk of injuries to the other animals in the truck. The gelding is very thin with prominent backbone. He is **lame in the injured front leg, a clear indication of pain**. Slaughter is still going on and it is unacceptable that this horse is not released from suffering.



Gelding with fresh, gaping wound and hoof shoes

Late in the morning, an employee is observed **moving this group of 23 horses without ear tags from the paddock over to the slaughterhouse**. Shortly after, horses are seen standing in a raceway in a roofed area next to the lairage. They are nervous, as shown by their rapid ear movements. No ear tags are visible. An employee is then observed climbing a platform by the raceway, **with pliers in his hand**. Moments later, the same horses are **released back into the paddocks – now marked with ear tags!**

According to Argentinian law⁵, horses destined for slaughter are required to be identified by ear tags at the slaughter horse collection centre, so-called “acopio” (see chapter IV page 31). For many years, we have been pointing out that the **Argentinian system of traceability is unreliable** and therefore opens the door to fraud⁶. Now it has once again been proved that cheating takes place and traceability cannot be guaranteed. **Lamar is part of a system in which fraud is widespread and common**.

⁴ Regulation (EC) No 854/2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption, Annex I, Section II, Chapter V, Article 1

⁵ Resolución 146/2010, Annex VI, Procedimiento de identificación

⁶ In 2013, we published a report in German about slaughter of stolen horses in Argentina: “Hehlerware Pferdefleisch aus Argentinien”



Horses being ushered to the plant to get ear tags, including two severely lame ones

When the horses are released back into the paddock in small groups of four to five horses, it becomes evident that many are lame and have bad hooves. A white horse has **particularly neglected hooves with severe cracks**. In Germany, such neglect would constitute a criminal offence, according to Dr. med. vet. Eggert.



Horses with severely neglected hooves

The dark-bay gelding with the fresh, gaping wound is one of the first horses being released. Back in the paddock, he is walking around restlessly, clearly limping, and whinnying at times. As can be seen later, he is looking for a small white mare he is bonded with. Eventually, he walks back towards the buildings and disappears behind a wall. Shortly afterwards, he comes back together with his friend and three other horses, all in poor condition. One of them is the emaciated black-grey mare described above. While the other horses walk to the water trough to drink, she stands still and looks exhausted, breathing heavily. When she follows other horses to the far end of the paddock, it becomes evident that walking is painful for her. Later, the **black mare with deformed hoof** is released back into the paddock, **struggling to follow the group**.

Like during our last visit in December 2016, **stallions are mixed with mares, and injured horses are not isolated**. We observe the injured grey stallion chasing off a black horse, who kicks out and hits his head. Aggressive behaviour between horses increases the risk of injuries. Later, the grey stallion is again observed chasing away other horses, including the severely lame black mare with deformed hoof.

There are only two hay bales in this paddock and it is very likely that only the dominant horses can eat. Three horses gather around one hay bale and six around the other. Two horses are seen walking towards a hay bale but **cannot eat as other horses block their access**.



Black horse kicking the injured stallion

At 13:30, a new group of approximately 20 horses is moved into another paddock closer to the plant. They **only have one hay bale available**. Several hungry horses immediately start **searching the dirt floor for food**. Their condition is difficult to assess from the distance, but we can see that they wear ear tags. **One mare is clearly pregnant**. Shortly after, another group of 25 horses with ear tags are moved into the same paddock. They are most likely from the same transport consignment. A bay horse is very thin and has a **severe swelling at the hock** of the right hind leg.



Highly pregnant mare



Horse with swollen hock

Later, a new group of about 30 horses are moved into another paddock. They wear ear tags, but do not have the mandatory "F" branding. A black horse and a chestnut are very thin with prominent hip bones and ribs, and another black horse is **lame in the left front leg**. No injuries are visible from the distance. The new group also has **just one hay bale in their paddock, which is insufficient for all the horses**.



A lot of horses have no access to feed

Slaughter has stopped before we leave Lamar at 14:30.

2. Slaughterhouse Entre Rios

Address:

Frigorífico Equino Entre Rios S.A.
Calle Pública S/n
Guaiguay
Provincia de Entre Rios

EU approval number: 1400

Saturday, 24.06.2017

It is almost dark when we arrive at the slaughterhouse Entre Rios in the early evening. It is here that during our last investigations we discovered a pile of dead horses behind the buildings. Today, everything is quiet and no horses are seen on the slaughterhouse's premises. A taxi driver tells us that there has been **no slaughter for at least one month**. He says that the slaughterhouse is closed because the owners owe money to the employees, and that the employees are protesting.

We talk to some people who live in the vicinity of the plant and they confirm this information. They say that the **slaughterhouse is bankrupt** and think it is unlikely that it would start working again. Possibly after a change of ownership.

3. Slaughterhouse General Pico

Address:

Frigorífico General Pico S.A.
Ruta 36
Río Cuarto
Provincia de Córdoba

EU approval number: 2009

Sunday, 25.06.2017

We arrive at the slaughterhouse General Pico outside Río Cuarto at 17:00. Like during our last visit in December, no horses can be seen from outside, as there is a tall fence with **visual cover all along the road** blocking the view. Nevertheless, we manage to get a view of the premises. We realize that there is **still insufficient weather protection**. **Only one row of holding pens is partly covered by a fabric roof** and the majority of the pens are fully exposed to sun and rain.



Visual shield & insufficient shelter

Today the small holding pens close to the buildings are full of horses, while on the large paddocks which are further away only few horses are seen. We estimate that there are around 500 horses in total. The horses are **very crowded, which results in biting and kicking**. We observe a chestnut being bullied and bitten by two other horses. Weak and submissive animals have **no possibility of retreat** in the overcrowded pens.

The **supply of hay is not sufficient for the number of horses in the pens and many cannot access the feed**. Some pens have one big hay bale, which is occupied by a few horses, while other pens only have food remains scattered on the ground. **Several pens have no feed at all** as none of the horses are observed eating.

We observe how a **dominant horse keeps chasing others away from the only hay bale in the pen**. In the pens at the back, the horses are eating food remains from the floor. A horse is observed biting another in the neck to chase him away from the sparse food.



Horse biting others in overcrowded pen



Dominant horse chasing others away from feed

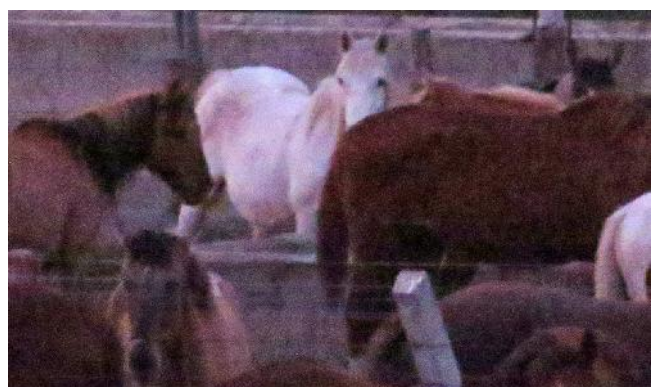
Some mares **appear to be pregnant**. A lot of horses are thin, **some are emaciated with sunken flanks and prominent hip bones, spine and ribs**. It has to be noted that in the EU, severely emaciated horses are not considered fit for slaughter for human consumption (see chapter III page 25).

A bay horse and a chestnut are seen **lying flat on the ground without moving**, while the other horses are all standing. We cannot tell if they are just exhausted or injured. The bay horse is later observed moving and breathing heavily.

Even from the distance, we recognise that **several horses have strongly neglected hooves**, overgrown and with cracks.



Horse with neglected, cracked hooves



Mare that appears to be pregnant



Two horses lying flat on the ground without moving

We detect a thin bay gelding who is **injured and unable to bear any weight on the left front leg**. He is observed **hopping on three legs**. This horse should have not been transported to the slaughterhouse in the first place, or, if the injury happened during transport, he **should have been emergency killed right upon arrival**. However, as today it is Sunday, it must be assumed that he has been **left unattended in the waiting area over the weekend**. This is totally unacceptable and a serious violation of animal welfare.

A bay horse has an **injury at the mouth, what looks like a fractured lower jaw**, and has great difficulty eating. His turned-back ears indicate pain. This horse as well should have been slaughtered immediately after arrival at the plant, instead of being left in the holding pens over the weekend, as **eating is obviously difficult for him at best, perhaps even extremely painful**.



Injured horse hopping on three legs



Horse with injured jaw having difficulties eating

In the seriously overcrowded pens at the back, we observe two horses fighting. A very small one, either a foal or a pony, is standing right next to them. It can be assumed that he was transported together with the adult horses. **In the EU, young and small horses would have to be transported separately⁷**, as the risk of them being trampled is very high.

⁷ EC Regulation 1/2005, Annex I, Chapter III, Article 1.12



Small horse (pony or foal) mixed with big adult horses

During our last visit, we were surprised to see that none of the horses had ear tags, despite the **legal requirement saying that slaughter horses must be marked with ear tags at the “acopio” (collection centre) before being shipped to the slaughter plant⁸**. Today, we see only one group of horses wearing ear tags. Some of the untagged animals have white numbers painted on their backs, possibly from auctions. Several horses have the mandatory “F” branding meaning “Faena” (slaughter) on their right hindquarters, while other animals in the same group do not.



Some horses with ear tags...



... and others without



Horse with white number on its back



Horses with and without mandatory “F” branding

We leave the General Pico slaughterhouse at 19:30 when it is dark, with the intention to continue filming on the next day. We talk to a person who lives close to the plant and whose father works there. We learn that they currently **slaughter a lot of horses, about 200 per day, and hire new employees.**

⁸ Resolución 146/2010, Annex VI, Procedimiento de identificación (see chapter IV page 31)

Contrary to the Entre Rios slaughterhouse, which had to close down, business seems to be running well for General Pico.

Monday, 26.06.2017

We return to the General Pico slaughterhouse at 10:30 in order to get footage with better light conditions than yesterday evening. We note that there are a lot of employees and movements around the plant. Just before we return to our observation point, the police arrive and want to know what we are doing here. They tell us that we have attracted attention and someone has called them because the slaughterhouse had got robbed two nights before. **After talking to the police, we decide to leave the place.**

III. EU legislation applicable in Third Countries

Third countries must be approved to export a specific category of meat and must be entered in the list of approved third countries for that specific category⁹. All slaughter plants in third countries, wanting to export their products to the EU, have to obtain a relevant EU certification. The **EU certification is meant to ensure that the plants are in compliance with minimum standards** regarding animal health, food safety and animal welfare.

The **legal basis for the listing of third countries** from which import of meat and meat products is permitted, as well as for the **listing of establishments** in third countries, is provided by **Regulation (EC) 854/2004**. The requirements for each category of meat are specified in **Annex III to the Regulation (EC) 853/2004**. These requirements must be checked and guaranteed by competent authorities of third countries before plants can be listed as EU-approved establishments. It is important to note that it is not the EU Commission that issues EU certifications for plants, but the third country authorities. This means that import to the EU is authorised if it comes from approved establishments which have been inspected by the authorities of the exporting countries and found to meet EU requirements¹⁰.

Article 12 of Regulation (EC) 854/2004 lays down that the **competent authority of the third country of origin has to guarantee that establishments placed on the list of establishments, from which meat exports to the EU are permitted, comply with the relevant EU requirements, in particular those of Regulation (EC) 853/2004**, or with the requirements that were determined to be equivalent. An official inspection service has to supervise the establishments, and in the event that the establishments fail to meet the relevant requirements, it has **real powers to halt exports to the EU**. The competent authority is responsible to keep the lists of establishments up to date and to inform the Commission of any necessary changes.

In third countries exporting meat and meat products to the EU, **EU animal welfare requirements apply only in slaughterhouses** (Regulation (EC) 1099/2009). The transport of the animals to the slaughter plants is not covered by EU legislation. **National animal transport regulations in Argentina are far below EU standard** and do not provide adequate protection to the animals (see comparative table in Annex 1). For example, the Argentinian “Resolución 97/1999” allows a maximum transport time of 36 hours without water, feed or rest compared to the EU maximum of 24 hours, with water and rest provided every 8 hours.

Since 2012, our investigations have been exposing very poor transport conditions. The most recent **EU audit about horsemeat production in Argentina, held in September 2014**,¹¹ confirmed our findings. Necropsies performed on horses dead on arrival in one slaughterhouse showed that **most deaths were possibly due to inadequate conditions of transport** (e.g. limb or rib fractures, spleen rupture) **or that some animals had pre-existing conditions which were aggravated during the transport** (e.g. cachexia, intestinal or uterine torsions and ruptures). The competent authorities explained that loading densities and duration of transport are not set in legislation but only in guidance. **Legal actions against transporters could be taken** by the local animal health offices following information received by the veterinary service of the slaughterhouse, but **no evidence of actions taken** was found. Apparently, violations against animal welfare during transport are tolerated, thus **unfit animals with pre-existing conditions continue to be transported to slaughter**, as we once again documented during our latest investigation in June 2017.

⁹ https://ec.europa.eu/food/safety/international_affairs/trade/non-eu-countries_en

¹⁰ https://ec.europa.eu/food/sites/food/files/safety/docs/ia_trade_import-cond-meat_en.pdf

¹¹ EU audit report 2014: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3375

1. Non-compliance with Regulation (EC) No 854/2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption¹²

Article 1: Scope

1. This Regulation lays down **specific rules for the organisation of official controls** on products of animal origin.
2. It shall **apply only in respect of activities and persons to which Regulation (EC) No 853/2004 applies**.

Note: As Regulation (EC) 853/2004 applies to food business operators producing meat in third countries destined for export to the EU, hence Regulation (EC) 854/2004 also applies to them.

Article 4: General principles for official controls in respect of all products of animal origin falling within the scope of this Regulation

2. The competent authority shall carry out official controls to **verify food business operators' compliance with the requirements of: (b) Regulation (EC) No 853/2004;**

Note: See subchapter 2 about non-compliance with Regulation 853/2004 on page 26.

Article 11: **Lists of third countries** and parts of third countries from which imports of specified products of animal origin are permitted

4. When lists are drawn up or updated, particular account shall be taken of the following criteria:
 - (a) **the legislation of the third country** on: (i) products of animal origin, (...)
 - (h) the assurances which the third country can give regarding **compliance with, or equivalence to, Community requirements;** (...)
 - (k) the results of Community controls carried out in the third country, in particular the results of the **assessment of the competent authorities, and the action that competent authorities have taken in the light of any recommendations addressed to them following a Community control;** (...)

Note regarding (a) and (h): Argentina's regulations on the protection of animals at slaughter (Resolución 46/2014) are by far not equivalent to those of Council Regulation (EC) 1099/2009 (see comparative table in Annex 2). Apparently, the Commission approves export of meat to the EU from third countries whose requirements for animal welfare at slaughter are by far not equivalent to those of the EU, although Article 12 of Regulation (EC) 1099/2009 requires them to be equivalent (see subchapter 3 on page 27).

Note regarding (k): The report of an EU audit carried out in Argentina in 2012 found the supervision of the competent authority SENASA¹³ to be unsatisfactory, and the repeated recommendations of three previous EU audit reports had not been properly addressed¹⁴. The report of the most recent EU audit in September 2014 stated that the implementation of some recommendations was still in progress, in particular, the re-evaluation of establishments and the registration of medicinal treatments¹⁵.

Article 12: **List of establishments** from which imports of specified products of animal origin are permitted

2. An **establishment may be placed on such a list** only if the competent authority of the third country of origin guarantees that:

- (a) that establishment, together with any establishments handling raw material of animal origin used in the manufacture of the products of animal origin concerned, **complies with relevant Community requirements, in particular those of Regulation (EC) No 853/2004, or with requirements that were determined to be equivalent** to such requirements when deciding to add that third country to the relevant list in accordance with Article 11;

¹² <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2004:226:0083:0127:EN:PDF>

¹³ Argentinian Veterinary Authority (Servicio Nacional de Sanidad y Calidad Agroalimentaria)

¹⁴ EU audit report 2012: http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_id=3043

¹⁵ EU audit report 2014: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3375

- (b) an **official inspection service in that third country supervises the establishments** and makes available to the Commission, where necessary, all relevant information on establishments furnishing raw materials; and
- (c) it has **real powers to stop the establishments from exporting to the Community** in the event that the establishments fail to meet the requirements referred to under (a).

3. The competent authorities of third countries appearing on lists drawn up and updated in accordance with Article 11 shall guarantee that **lists of the establishments** referred to in paragraph 1 are drawn up, **kept up-to-date** and communicated to the Commission.

Note: The report of an EU audit carried out in Argentina in October 2012 states: „Despite frequent well documented official controls, establishments not in compliance with the relevant EU requirements remain on the list. The establishment review carried out by the SENASA has not been efficient. The repeated recommendations of three consecutive FVO audit reports have not been properly addressed.”¹⁶ The EU audit report from September 2014 again noted deficiencies in the official controls of the SENASA competent authority, and once more made the following recommendation: “To ensure that lists of establishments approved for export to the European Union are kept up-to-date as required by Article 12 of Regulation (EC) No 854/2004.”¹⁷ Our observations made between 2015 and June 2017 confirm that horse slaughter plants on the list of approved establishments do not fulfil the relevant EU requirements (also see our report “Production of horsemeat in Argentina, 2015 & 2016”).

Article 5: Fresh meat

1. The **official veterinarian shall carry out inspection tasks in slaughterhouses**, game handling establishments and cutting plants placing fresh meat on the market **in accordance with the general requirements of Section I, Chapter II, of Annex I**, and with the specific requirements of Section IV, in particular as regards:

- (b) **ante-mortem inspection;**
- (c) **animal welfare;**

3. After carrying out the controls mentioned in points 1 and 2, **the official veterinarian shall take appropriate measures as set out in Annex I, Section II**, in particular as regards:

- (c) **decisions concerning live animals;**
- (d) **decisions concerning animal welfare; and**
- (e) **decisions concerning meat.**

Annex I, Section I, Chapter II: INSPECTION TASKS

B. Ante-mortem inspection

2. Ante-mortem inspection must in particular determine whether, as regards the particular animal inspected, there is any sign:

- (a) that **welfare has been compromised;** or
- (b) of **any condition which might adversely affect human or animal health**, paying particular attention to the detection of zoonotic diseases and diseases on List A or, where appropriate, List B of the Office International des Epizooties (World organisation for animal health, OIE).

Note: The quality of the ante-mortem inspections at the horse slaughterhouses has to be seriously called into question, if on every single day of our investigation we saw severely injured, emaciated, very weak or sick animals in the holding pens; animals that have not been isolated from the others, treated or if necessary emergency killed (also see our report “Production of horsemeat in Argentina, 2015 & 2016”).

¹⁶ EU audit report 2012: http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_id=3043

¹⁷ EU audit report 2014: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3375

The report of the most recent EU audit held in September 2014 confirms that the veterinary ante-mortem inspections are not reliable. In one of the two slaughterhouses visited, the records of the ante-mortem inspections of the animals present during the audit did not mention any findings concerning injured animals, although one horse in a group observed by the audit team had an open wound on a front leg and others had bruises. An extensive bruise with a huge haematoma on the rump of one horse was later seen during post-mortem¹⁸.

C. Animal welfare

The official veterinarian is to **verify compliance with relevant Community and national rules on animal welfare, such as rules concerning the protection of animals at the time of slaughter and during transport.**

Note: EU requirements on animal welfare during transport do not apply in third countries, while their national rules are far below EU standards and do not provide adequate protection (see comparative table in Annex 1). The official veterinarians' checks on animal welfare are clearly insufficient, if not inexistent, in view of the numerous violations against the applicable requirements of Regulation (EC) 1099/2009 on the protection of animals at the time of killing, which we observed yet another time during our last investigation in June 2017 (see subchapter 3 on page 27).

Annex I, Section II, Chapter III: DECISIONS CONCERNING LIVE ANIMALS

1. The official veterinarian is to verify compliance with the food business operator's **duty pursuant to Regulation (EC) No 853/2004 to ensure that animals accepted for slaughter for human consumption are properly identified. The official veterinarian is to ensure that animals whose identity is not reasonably ascertainable are killed separately and declared unfit for human consumption.**

4. Animals with a disease or condition that may be transmitted to animals or humans through handling or eating meat and, **in general, animals showing clinical signs of systemic disease or emaciation, are not to be slaughtered for human consumption.** Such animals must be killed separately, under conditions such that other animals or carcasses cannot be contaminated, and declared unfit for human consumption.

Note regarding paragraph 1: According to Argentinian law, horses destined for slaughter must be identified with ear tags at the slaughter horse collection centre, before being shipped to slaughter (see chapter IV on page 31). Slaughter plants can only purchase properly identified horses. In June 2017, we yet again saw horses without ear tags at both slaughterhouses Lamar and General Pico. At General Pico, the large majority of the horses were not ear-tagged. At Lamar, we observed a group of 23 horses receiving ear tags on the slaughterhouse premises. Horses of unknown origin obviously enter the slaughter process, and are not declared unfit for human consumption.

Note regarding paragraph 4: At least three horses of the above-mentioned group that received ear tags at Lamar should have been declared unfit for human consumption instead of being tagged for slaughter, according to a German official veterinarian to whom we showed the footage. One of them showed signs of a systemic condition (severe chronic inflammation) while two others were extremely emaciated and in an impaired general condition (see pages 11 to 13).

Annex I, Section II, Chapter IV: DECISIONS CONCERNING ANIMAL WELFARE

1. When the rules concerning the protection of animals at the time of slaughter or killing are not respected, the official veterinarian is to **verify that the food business operator immediately takes necessary corrective measures and prevents recurrence.**

¹⁸ EU audit report 2014: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3375

2. The official veterinarian is to take a proportionate and progressive approach to **enforcement action**, ranging from issuing directions to **slowing down and stopping production**, depending on the nature and gravity of the problem.

Note: Since 2012, we have been documenting grave violations against the applicable requirements of Regulation (EC) 1099/2009 on the protection of animals at the time of killing; the same violations were observed once more during our last investigation in June 2017 (see subchapter 3 on page 27). The supervision of the competent authority SENASA still appears to be unsatisfactory, as already stated by the FVO in 2012¹⁹. There seems to be a complete lack of enforcement or application of corrective measures. The SENASA has the power to stop the establishments from exporting horsemeat to the EU, as they fail to meet the relevant EU requirements, but remains inactive.

Annex I, Section II, Chapter V: **DECISIONS CONCERNING MEAT**

1. **Meat is to be declared unfit for human consumption if it:**

- (f) derives from **animals affected by a generalised disease, such as generalised septicaemia, pyaemia, toxæmia or viraemia;**
- (q) derives from **emaciated animals;**
- (u) in the opinion of the official veterinarian, after examination of all the relevant information, it may constitute a **risk to public or animal health or is for any other reason not suitable for human consumption.**

General note: As mentioned above, at least three horses who were marked with ear tags at Lamar should have been declared unfit for human consumption instead of being tagged for slaughter, according to the assessment of Claudia Eggert, who had worked for 15 years as an official veterinarian in a slaughterhouse in Germany, where she supervised horse slaughter.

Note regarding (f) and (u): One of these horses, a stallion with severely swollen leg, showed signs of a generalised disease (see page 12). Because he had an old wound and chronic inflammation, as shown by the reduced musculature of the injured leg, it can be assumed that germs were present in the bloodstream and thus in the whole body. Depending on the type of microorganisms, the animal had a septicaemia (blood poisoning), pyaemia (pyogenic microorganisms in the blood), toxæmia (bacterial toxins in the blood) or viraemia (viruses in the bloodstream). According to Claudia Eggert, the stallion most likely had a pyaemia, as pus organism are often involved when old wounds are located on the lower leg. As he might have had a condition that could be transmitted to humans through eating meat, he should not have been accepted for slaughter.

Note regarding (q): Besides the two lame mares that, according to Claudia Eggert, should have been excluded from slaughter for human consumption because they were extremely emaciated (see pages 11 to 13), we have been documenting the presence of severely emaciated horses at all three slaughter plants since 2012. These horses were not only unfit for human consumption, but also unfit for transport and should have never been brought to the slaughterhouses in the first place.

¹⁹ EU audit report 2012: http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_id=3043

2. Non-compliance with Regulation (EC) No 853/2004 laying down specific hygiene rules for food of animal origin²⁰

Article 3: General obligations

1. Food business operators shall comply with the relevant provisions of Annexes II and III.

Annex III, Section I, Chapter I: TRANSPORT OF LIVE ANIMALS TO THE SLAUGHTERHOUSE

Food business operators **transporting live animals to slaughterhouses** must ensure compliance with the following requirements.

1. During collection and transport, animals must be handled carefully **without causing unnecessary distress**. **Observations:** By transporting to the slaughterhouse horses which are unfit for transport, unnecessary distress is caused to them. According to veterinarian Claudia Eggert, three horses observed at Lamar were in severe pain and their condition had already existed before transportation, making them unfit for transport (see pages 11 to 13). They should have been euthanized on the spot to avoid further suffering.

Annex III, Section I, Chapter II: REQUIREMENTS FOR SLAUGHTERHOUSES

Food business operators must ensure that the construction, layout and equipment of slaughterhouses in which domestic ungulates are slaughtered meet the following requirements.

1. (a) Slaughterhouses must have adequate and hygienic lairage facilities or, climate permitting, **waiting pens that are easy to clean and disinfect**. These facilities must be equipped for watering the animals and, if necessary, **feeding them**. (...)
 - (b) They must also have separate lockable facilities or, climate permitting, **pens for sick or suspect animals** with separate draining and sited in such a way as to avoid contamination of other animals, unless the competent authority considers that such facilities are unnecessary.
 - (c) The **size of the lairage facilities must ensure that the welfare of the animals is respected**. Their layout must facilitate ante-mortem inspections, including the identification of the animals or groups of animals.

Observations (a): Only the pens in the lairage area (Lamar) have a concrete floor which is easy to clean and disinfect. The floors of the outdoor holding pens and paddocks at Lamar and General Pico consist of dirt mixed with manure. When it rains, these floors turn into deep mud, as we observed during our investigation in December 2016. While troughs for feeding the animals are sometimes present, they are not used frequently, as seen at General Pico. At both slaughterhouses, hay bales are carelessly dropped on the filthy floor and horses are observed eating food remains from the ground polluted by faeces.

Observations (b): If there are special pens for sick and suspect animals, they are in many cases not used. In June 2017, in the holding pens of Lamar and General Pico, we once again saw many injured, emaciated, weak and possibly sick horses which have not been isolated from the other animals, cared for, or emergency killed if necessary.

Observations (c): The waiting pens of both slaughterhouses visited – with exception of the large paddocks at Lamar – were overcrowded, causing considerable stress for the animals and leading to biting and kicking, and possible injuries. It is all the more unacceptable that the horses were packed together so tight, while empty pens were available.

Annex III, Section I, Chapter IV: SLAUGHTER HYGIENE

Food business operators operating slaughterhouses in which domestic ungulates are slaughtered must ensure compliance with the following requirements.

²⁰ [http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32004R0853R\(01\)&from=EN](http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32004R0853R(01)&from=EN)

1. After arrival in the slaughterhouse, the **slaughter of the animals must not be unduly delayed**. However, where required for welfare reasons, animals must be given a resting period before slaughter.
3. The animals or, where appropriate, each batch of animals sent for slaughter **must be identified so that their origin can be traced**.
6. Animals brought into the **slaughter hall must be slaughtered without undue delay**.

Observations point 1: At both slaughterhouses visited in June 2017, horses were observed staying in the waiting pens overnight and also over the weekend. It is unacceptable that even the slaughter of suffering animals is delayed. At Lamar, several injured and lame animals were not released from suffering although slaughter was taking place.

Observations point 3: According to Argentinian law, horses destined for slaughter must be identified by ear tags at the slaughter horse collection centre, before being shipped to slaughter (see chapter IV on page 31). In June 2017, we yet again saw horses without ear tags at both Lamar and General Pico. At General Pico, most of the horses were not tagged, while at Lamar we observed a group of 23 horses receiving ear tags on the slaughterhouse premises. Horses of unknown origin obviously enter the slaughter process and thus food chain. For many years we have been pointing out that the Argentinian system of identification is inappropriate and does not guarantee traceability. In fact, it opens the door to fraud and results in the introduction of stolen horses to the horsemeat production chain²¹.

Observations point 6: When we arrived at Lamar in the early morning, the lairage area (slaughter hall) was already full of horses before any activities started. They obviously had stayed there overnight. These pens are very small and crowded, and it is uncertain if the horses have access to water and food.

3. Non-compliance with Regulation (EC) 1099/2009 on the protection of animals at the time of killing²²

Slaughterhouses in third countries exporting meat to the EU have to comply with minimum standards regarding animal welfare, as required by EU Council Regulation (EC) 1099/2009. The animal welfare requirements are incorporated in the import certificates in form of an attestation, and the veterinary authority of the country of origin has to certify that they were met, together with the animal and public health requirements. **Article 12 of Chapter II of Regulation (EC) 1099/2009 states:**

Imports from third countries

The requirements laid down in Chapters II and III of this Regulation shall apply for the purposes of **Article 12(2)(a) of Regulation (EC) No 854/2004**.

The health certificate accompanying meat imported from third countries shall be supplemented by an attestation certifying that **requirements at least equivalent to those laid down in Chapters II and III of this Regulation have been met**.

However, our observations from **June 2017** show once again that EU-approved horse slaughterhouses in Argentina, Lamar and General Pico, **do not comply with several requirements of Chapter II and III** of Regulation (EC) 1099/2009 on the protection of animals at the time of killing:

²¹ In 2013, we published a report in German about slaughter of stolen horses in Argentina: "Hehlerware Pferdefleisch aus Argentinien"

²² <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:303:0001:0030:EN:PDF>

Chapter II, Article 3: General requirements for killing and related operations

1. Animals shall **be spared any avoidable pain, distress or suffering** during their killing and related operations.

Observations: seriously injured horses are left unattended in the holding pens instead of being humanely killed immediately after arrival in order to avoid further suffering; employees hit horses and spray strong water jets at their faces; horses are kept in overcrowded conditions which causes considerable stress and leads to biting, kicking and possible injuries.

2. For the purposes of paragraph 1, business operators shall, in particular, take the necessary measures to ensure that animals:

(a) are provided with **physical comfort and protection**, in particular by **being kept clean in adequate thermal conditions** and **prevented from falling or slipping**;

(b) are **protected from injury**;

(d) **do not show signs of avoidable pain or fear** or exhibit abnormal behaviour;

(e) **do not suffer from prolonged withdrawal of feed or water**;

(f) are prevented from **avoidable interaction with other animals that could harm their welfare**.

Observations (a) and (b): no protection from adverse weather conditions for the majority of horses; slippery concrete floor in lairage area causing horses to slip and fall, creating the risk of severe injuries; manure covered floors in outdoor pens; lack of clean and dry resting places; overcrowding in most holding pens causing stress, biting, kicking and possible injuries.

Observations (d): seriously injured/sick horses that have difficulties walking or have open wounds are moved to the waiting pens instead of being euthanized upon arrival; a large number of horses show clear signs of pain (lameness, forced breathing, dilated nostrils, turned-back ears); horses panic when being hit or splashed with water jets by employees; horses rear up in panic when being moved towards the stunning chute; a horse with a wire tied through his mouth shows signs of pain.

Observations (e): insufficient number of feeding places for the quantity of animals (one or two feed sources per pen); weak and submissive horses do not have access to the hay bales as they are chased away by dominant ones; hungry horses are observed searching the dirt for feed remains; several pens have no feed at all.

Observations (f): stallions are mixed with mares and geldings; injured/sick animals are not isolated; hostile animals are not separated from the others.

Chapter II, Article 7: Level and certificate of competence

1. Killing and related operations shall only be carried out by **persons with the appropriate level of competence to do so without causing the animals any avoidable pain, distress or suffering**.

2. Business operators shall ensure that the following slaughter operations are only carried out by persons **holding a certificate of competence for such operations**, as provided for in Article 21, demonstrating their ability to carry them out in accordance with the rules laid down in this Regulation:

(a) **the handling and care of animals before they are restrained**;

Observations: employees handling live animals appear to be untrained and use violent methods like hitting them fiercely with flags and sticks – also on their heads – and spraying water at their faces; some employees hit the horses for no reason at all, when the animals cannot move forward, and seem to enjoy hitting and frightening the animals.

Chapter III, Article 14: Layout, construction and equipment of slaughterhouses

1. Business operators shall ensure that the layout and **construction of slaughterhouses and the equipment used therein comply with the rules set out in Annex II**.

Annex II, Paragraph 1.3. Lairage facilities shall be designed and constructed so as to **minimise the risk of injuries to the animals** and the occurrence of **sudden noises**.

Observations: slippery concrete floor in lairage area poses a risk of injuries; loud banging is heard from the plant when slaughter is taking place.

Annex II, Paragraph 2.5. Floors shall be built and maintained in such a way as to **minimise the risk of animals slipping, falling** or injuring their feet.

Observations: concrete floor in the lairage area is slippery, especially when wet after hosing down horses; horses observed slipping and falling.

Annex II, Paragraph 2.6. Where slaughterhouses have field lairages without natural shelter or shade, appropriate **protection from adverse weather conditions** shall be provided. In the absence of such protection, these lairages shall **not be used under adverse weather conditions**.

Observations: the majority of the holding pens of both slaughterhouses offer no shelter and thus no protection from sun and rain; in December 2016 we observed that these pens are also used during very hot weather; waiting pens at Lamar which used to be partly covered by a fabric roof now offer no shelter at all as the fabric has completely come down and not been replaced.

Chapter III, Article 15: Handling and restraining operations at slaughterhouses

1. Business operators shall ensure that the **operational rules for slaughterhouses set out in Annex III are complied with**.

Annex III, Paragraph 1.1. The **welfare conditions of each consignment of animals shall be systematically assessed** by the animal welfare officer or a person reporting directly to the animal welfare officer upon arrival in order to **identify the priorities**, in particular by determining which animals have **specific welfare needs and the corresponding measures to be taken**.

Observations: severely injured horses are taken to the holding pens although they should have been slaughtered/euthanized immediately after arrival to end their suffering.

Annex III, Paragraph 1.8. It shall be **prohibited to:**

(a) **strike** or kick the animals;

Observations: employees hitting horses repeatedly with flags and sticks, including on their heads.

Annex III, Paragraph 2.4. Every day that the slaughterhouse operates, before any animal arrives, **isolation pens for animals that require specific care** shall be prepared and kept ready for immediate use.

Observations: severely injured, weak or sick horses are kept in the same pens with other ones, instead of being isolated, cared for by a veterinarian, or emergency killed if necessary.

Annex III, Paragraph 2.5. The condition and **state of health of the animals in a lairage shall be regularly inspected** by the animal welfare officer or a person having appropriate competence.

Observations: during our observations of the slaughter plants we have never seen any employee checking on the horses' welfare and health condition; injured/sick horses showing obvious signs of pain are left unattended in the holding pens.

Since 2012, our investigations have been showing very poor animal welfare conditions at EU-approved horse slaughter plants in Argentina. The most recent **EU audit about horsemeat production in Argentina, held in September 2014, confirmed that Council Regulation (EC) 1099/2009 is not fully implemented**²³:

²³ EU audit report 2014: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3375

- The Argentinian CCA²⁴ has organised **training on animal welfare** and certificates of competence had recently been provided, but **only to the animal welfare officers and to the heads of the veterinary services** of slaughterhouses. The CA stated that further training sessions for slaughterhouse staff handling live animals will be organised.
- Animals are provided with bedding and **feed only after a period of 24 hours** of stay in the lairages, whereas the EU Regulation requires that animals are provided with feed and bedding after 12 hours.

²⁴ Central Competent Authority

IV. Non-compliance with Argentinian legislation regarding traceability

Currently, horses born and reared in Argentina for purposes other than slaughter are not required to be identified, as a general rule. In Argentina, horses are not considered to be food producing animals until they have been designated for this purpose.

EU legislation applicable in third countries requires that horses destined for slaughter must be identified so that their origin can be traced (Annex III, Section I, Chapter IV, paragraph 3 of Regulation 853/2004). The relevant legislation in force in Argentina is **Resolución No 146/2010 of SENASA**²⁵ that creates a national regulatory framework for the slaughter of equines. The requirements regarding identification and traceability are the following:

Art. 5º — Equidae slaughterhouse. Responsibilities. **Any slaughterhouse which slaughters equidae:**

Paragraph 1. Has to supply itself exclusively from premises registered in the Sole National Register of Slaughter Equidae Supplying Firms.

Paragraph 2. **Has to supply itself with animals which are properly identified** and which dispose of the pertinent Individual Evidence of Equidae Treatment Register (DIRTE), as has been established by the present decision.

Paragraph 3. Has to check that the records included in the DIRTE comply with the pertinent information about the preventive periods preceding slaughter which is required regarding the subsequent destination of meat corresponding to equidae protected by this evidence.

Paragraph 4. Has to destroy the **ear tags of the slaughtered animals**.

Paragraph 5. Has at least to file the pertinent DIRTE for a period of two (2) years after the date slaughter has been effected.

ANNEX VI

NORMS TO BE APPLIED TO IDENTIFY THE EQUIDAE

All equidae which will be destined for slaughter has to be **individually identified** according to the identification procedure which is described as follows:

IDENTIFICATION PROCEDURE

a) **Identification has to be effected at Equidae Gathering Centres and/or at Equidae Holding Centres** which are duly registered with SENASA.

b) Identification will take place by **applying an individual ear tag**, unique and permanent, of the kind “button-button” on the left ear, **regardless of any other mean of identification the animal may possess**.

c) The aforementioned identification does not exempt from applying the **hot brand with the letter “F” on the right croup**.

During our most recent investigation, **in June 2017, we observed grave violations against Resolución No 146/2010** which requires that slaughter horses are identified by means of an individual ear tag that is applied at the collection centres or the registered farms (=holdings supplying horses to the collection centres). According to this national legislation, slaughterhouse operators may only receive properly identified horses. However, at both Lamar and General Pico we saw horses without ear tags yet another time. **At General Pico, the large majority of the horses were not tagged, while at Lamar we observed a group of 23 horses being marked with ear tags on the slaughterhouse premises**. Horses of unknown origin obviously enter the slaughter process and food chain.

²⁵ <http://www.senasa.gob.ar/tags/equinos-faena-formularios>

For many years, we have been criticizing the **Argentinian system of identification as unreliable and not guaranteeing traceability**. In fact, it **opens the door to fraud** and results in the introduction of stolen horses to the horsemeat production chain²⁶.

In addition to the identification with ear tags, slaughter horses **must also be hot branded with the letter “F”** on the right rump before being moved to the slaughterhouse²⁷. **At both Lamar and General Pico, we saw horses without the mandatory brand mark mixed with branded ones.**

The most recent **EU audit report about horsemeat production in Argentina**²⁸ also mentions deficiencies regarding traceability and identification marking, and states that corrective action would be required. In one of the two slaughterhouses visited, the veterinary service **had failed to notice, despite a repeated ante-mortem inspection, that 20 out of 48 horses in two consignments did not have ear tags**. In the second plant, the slaughterhouse operator had **no procedures in place to check the identification of the horses and had accepted unidentified animals**.

Apparently, nothing has changed since the last EU audit in September 2014 and no corrective measures seem to have been taken.

²⁶ In 2013, we published a report in German about slaughter of stolen horses in Argentina: “Hehlerware Pferdefleisch aus Argentinien”

²⁷ Hot-iron branding of horses is prohibited in several EU Member States, as it is considered to be an unnecessary and very painful procedure.

²⁸ EU audit report 2014: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3375

V. Non-compliance with OIE Terrestrial Animal Health Code (2014)

Our observations in Argentina show that conditions for slaughter horses are not only far below EU standards, but do not meet OIE standards either - despite **Argentina being a member of the OIE** (World Organisation for Animal Health). Member countries should respect the OIE Terrestrial Code which sets out standards for the improvement of animal health and welfare worldwide. However, **OIE standards are recommendations only**, and not compulsory legal regulations.

*“Except for the requirements for notification of listed diseases, the **OIE Standards are not compulsory**, but a harmonised basis for the Member Countries. While there is **no legal obligation**, each OIE Member Country should base its legislation on these Standards where they exist, depending of their national possibilities, plans and priorities.”* (Dr Etienne Bonbon, Advisor to the OIE)

During our most recent investigation, we found once more that many recommendations of the OIE Terrestrial Code are not respected in Argentina – neither at the slaughterhouses nor during transport.

1. Non-compliance with Chapter 7.5. Slaughter of animals

Article 7.5.1.

2. Personnel

Persons engaged in the unloading, moving, lairage, care, restraint, stunning, slaughter and bleeding of animals play an important role in the welfare of those animals. For this reason, there should be a sufficient number of **personnel, who should be patient, considerate, competent** and familiar with the recommendations outlined in the present chapter and their application within the national context. (...)

The management of the slaughterhouse and the Veterinary Services should **ensure that slaughterhouse staff are competent and carry out their tasks in accordance with the principles of animal welfare.**

Article 7.5.2.

1. General considerations

The following principles should apply to unloading animals, moving them into lairage pens, out of the lairage pens and up to the slaughter point:

- a) **The conditions of the animals should be assessed upon their arrival for any animal welfare and health problems.**
- b) **Injured or sick animals, requiring immediate slaughter, should be killed humanely and without delay**, in accordance with the recommendations of the OIE.
- e) Animals should be **handled in such a way as to avoid harm, distress or injury**. Under no circumstances should animal handlers resort to violent acts to move animals, such as crushing or breaking tails of animals, grasping their eyes or pulling them by the ears. Animal handlers should **never apply an injurious object or irritant substance to animals** and especially not to sensitive areas such as eyes, mouth, ears, anogenital region or belly. (...)
- g) (...) Any risk of compromising animal welfare, for example **slippery floor, should be investigated immediately and the defect rectified to eliminate the problem.**

Article 7.5.3.

3. Construction of lairage

- a) Lairages should be constructed and maintained so as to **provide protection from unfavourable climatic conditions** (...)
- b) **Floors should be well drained and not slippery**; they should not cause injury to the feet of the animals. Where necessary, floors should be insulated or provided with appropriate bedding.
- f) **Where animals are kept in outdoor lairages without natural shelter or shade, they should be protected from the effects of adverse weather conditions.**

Article 7.5.4.

Care of animals in lairages

Animals in lairages should be cared for in accordance with the following recommendations:

- 6) Waiting time should be minimised and should not exceed 12 hours. If animals are not to be slaughtered within this period, **suitable feed should be available to the animals on arrival** and at intervals appropriate to the species.
- 9) The condition and state of health of the animals in a lairage should be **inspected at least every morning and evening by a veterinarian** or, under the veterinarian's responsibility, by another competent person, such as an animal handler. **Animals which are sick, weak, injured or showing visible signs of distress should be separated, and veterinary advice should be sought immediately regarding treatment or the animals should be humanely killed immediately if necessary.**

2. Non-compliance with Chapter 7.1. Five Freedoms

Conditions for slaughter horses in Argentina are also in violation of the internationally recognised Five Freedoms, which have been adopted by the OIE. These are:

1. **Freedom from hunger, thirst and malnutrition**
2. **Freedom from fear and distress**
3. **Freedom from physical and thermal discomfort**
4. **Freedom from pain, injury and disease**
5. **Freedom to express normal patterns of behaviour**

VII. Conclusion

During our most recent investigation in Argentina in June 2017, yet another time we observed how horses destined for slaughter are not treated according to EU standards, neither during transport nor at the slaughter plants. The animal welfare concerns that remain unsolved to the present day are:

- Inadequate legislation for the protection of animals during transport and slaughter (see comparison of Argentinian and EU regulations in Annex 1 and 2);
- Use of vehicles which are inappropriate for the transport of horses and bear high risk of injuries: no individual stalls, low trap-doors, lack of roof and weather protection, no water system, etc.;
- Long-distance transport without water, feed or rest, also during very hot weather, leading to weak horses getting trampled and dying on board the trucks;
- Transport of unfit horses: severely injured, sick, weak or extremely emaciated;
- Untrained or incompetent personnel handling horses at slaughterhouses;
- Lack of weather protection for the large majority of the horses at all slaughterhouses visited;
- Emaciated, injured and sick horses as well as pregnant mares seen in waiting pens;
- No veterinary care or emergency killing of horses in obvious distress at all places visited;
- Crowded conditions in slaughterhouse pens leading to horses kicking and biting;
- Stallions mixed with mares, injured horses not isolated;
- Lack of feed or insufficient number of feeding places leading to horses fighting for access to feed;
- Use of dogs to move horses, biting them (slaughterhouse General Pico, December 2016);
- EU-approved slaughter plants with numerous violations of EU Regulation 1099/2009 on the protection of animals at the time of killing: lack of feed, brutal handling, lack of shelter, no emergency killing of suffering horses, slippery floors, etc.

In addition to serious animal welfare concerns, there is also a high risk of drug residues in horsemeat from Argentina. In fact, there is no system of equine identification and traceability comparable to that of the EU, where horses are microchipped and have an equine passport showing their medical history. In Argentina, the horses are identified only at the slaughter horse collection centres, where they are supposed to receive an ear tag and the brand mark “F” meaning “Faena” (slaughter), according to Resolución No 146/2010. The last owner of the horse simply has to sign a sworn statement on veterinary treatments applied during the last six months. Contrary to the EU, phenylbutazone and other drugs can be bought by the public without a veterinary prescription and are commonly used in sport horses, which are not excluded from slaughter.

The traceability system in Argentina is weak and insufficient, as described above, and moreover it is not followed. Thus, the origin of the horses and the medications given to them during their life remain impossible to trace. Some horses we saw at the Lamar slaughterhouse and most horses we saw at General Pico were not identified by slaughter ear tags and it remains an open question if they had the accompanying documents which would have to include the ear tag number. In addition to receiving untagged horses, which by itself is a violation of Resolución No 146/2010, Lamar was filmed cheating by applying ear tags to unidentified horses on premises of their slaughterhouse on 23rd June 2017.

The Argentinian system of equine identification is obviously insufficient to guarantee traceability and food safety, and opens the door to fraud. It has to be assumed that Argentinian horsemeat comes in a large part from horses of unknown origin, some of which are likely to have been stolen as the theft of horses is still common in this country. It further has to be assumed that a lot of horses that are sold for slaughter, stolen or not, are sport or leisure horses that were never intended for human consumption. It is therefore highly probable they were treated with substances that are not permitted for horses later destined for slaughter.

Furthermore, horses that according to the applicable EU legislation would have to be considered unfit for human consumption (because they show signs of a systemic condition or extreme emaciation) are entered into the slaughter process. As shown during our investigation in December 2016, even horses suffering from equine infectious anaemia (EIA) end up in EU-approved slaughterhouses. The Argentinian veterinary authority SENASA requires that horses with this disease are killed or slaughtered in order not to contaminate other horses. In the EU, horses with EIA would not be allowed to be slaughtered for human consumption.

Our call on the European Commission:

Our international animal welfare coalition, formed by Tierschutzbund Zürich (Switzerland), Animal Welfare Foundation (Germany), For the Animals Uruguay, Eyes on Animals (Netherlands), GAIA (Belgium), Welfarm (France), AFAAD (France), Animals' Angels USA and the Canadian Horse Defence Coalition, and supported by Eurogroup for Animals (Brussels), calls upon the European Commission to remove Argentina from the list of third countries from which imports of horsemeat are permitted, as an immediate step, as Argentina cannot guarantee compliance with, or equivalence to, the applicable EU requirements, in particular those of Regulation (EC) 853/2004, Regulation (EC) 854/2004 and Regulation (EC) 1099/2009.

In addition, as numerous NGO investigations²⁹ and several FVO³⁰ inspections carried out in other South and North American countries since 2010 revealed similar situations of non-compliance or non-equivalence with relevant EU requirements, the coalition calls upon the European Commission to also use its bilateral trade policy to positively influence equine welfare in third countries. This could be done by including firm conditions in respect of animal welfare standards into currently negotiating FTAs, cooperation on capacity-building and increased technical assistance to help the third country improving its animal welfare standards.

Conditional suspensions of horsemeat imports from Mexico and Brazil have already been imposed, following FVO audits in these countries. Consequently it would be expected the same measure would now have to be applied against Uruguay, as the most recent FVO audit report, published in May 2017, comes to the following overall conclusion: "With regard to horsemeat destined for export to the EU, the system in place does not provide adequate guarantees concerning some of the statements contained in the "EQU" certificate; in particular weaknesses have been noted concerning the controls aimed to ensure that the requirements on residency at the holdings, on administration of veterinary treatments at the animals and on animal welfare at the time of killing are met."³¹ This report clearly points on irregularities on which the European Commission should act upon. Following the findings of NGO investigations in Argentina in 2016 & 2017 and in Canada/USA in 2015 & 2016, the animal welfare coalition urges the European Commission to carry out new audits in Argentina and Canada (including Canadian horse feedlots) in the near future to ensure that current conditions under which horsemeat is produced meet applicable EU standards. If they do not, Argentina and Canada should also be removed from the list of third countries from where imports of horsemeat are permitted.

We believe that imports of horsemeat into the EU should only be allowed if EU welfare standards for slaughter and transport are met in third countries, as well as traceability and food safety standards (including use of veterinary drugs) that are equivalent to those applicable in the EU. To this end, we would like to encourage the European Commission to use its diplomatic and trade negotiations with third countries, particularly Argentina, Uruguay and Canada, to influence the creation and implementation of EU equivalent legislation that will protect equines during transport, slaughter and ensure adequate traceability of animals.

²⁹ See TSB|AWF's reports about horsemeat production in Uruguay, Argentina, Canada & USA from 2015 & 2016.

³⁰ The FVO is now called Directorate F of DG Health and Food Safety (DG Sante).

³¹ EU audit report Uruguay: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3793

Annex 1: Comparison of Argentinian and EU regulations for the protection of animals during transport

Regulations

Argentina: Resolución 97/1999

EU: COUNCIL REGULATION (EC) No 1/2005 of 22 December 2004 on the protection of animals during transport

	Resolución 97/1999	EU-Regulation 1/2005
General transport conditions	Art. 21. During the journey the animals must be regularly inspected to detect if some have fallen , to avoid that any be trampled or suffer major injuries.	Art. 3 a) All necessary arrangements have been made in advance to minimise the length of the journey and meet animals' needs during the journey; Art. 3 f) The transport is carried out without delay to the place of destination and the welfare conditions of the animals are regularly checked and appropriately maintained;
Animal handling	Art. 17. The loading has to be conducted with utmost caution, without causing suffering to the animals. The personnel which is responsible for the handling of the animals has to keep them calm all the time, act without harshness and avoid excessive noise as well as yelling or beating in order to prevent stress, injuries, aggressiveness and fighting between the animals.	Art. 3 e) The personnel handling animals are trained or competent as appropriate for this purpose and carry out their tasks without using violence or any method likely to cause unnecessary fear , injury or suffering; Annex I, Chapter III, 1. Loading, unloading and handling 1.8. It shall be prohibited to: a) strike or kick the animals ; b) apply pressure to any particularly sensitive part of the body in such a way as to cause them unnecessary pain or suffering; c) suspend the animals themselves by mechanical means; d) lift or drag the animals by head, ears, horns, legs, tail or fleece, or handle them in such a way as to cause them unnecessary pain or suffering; e) use prods or other implements with pointed ends; 1.9. The use of instruments which administer electric shocks shall be avoided as far as possible. In any case, these instruments shall only be used for adult bovine animals and adult pigs which refuse to move (...)
Ramps	Art. 4 c) If vehicles are equipped with a ramp, a grid of rigid material has to be attached so that the animals do not slip.	Annex I, Chapter III, 1. Loading, unloading and handling 1.3. Facilities for loading and unloading, including the flooring, shall be designed, constructed, maintained and operated so as to: a) prevent injury and suffering and minimise excitement and distress during animal movements as well as to ensure the safety of the animals. In particular,

		<p>surfaces shall not be slippery and lateral protections shall be provided so as to prevent animals from escaping;</p> <p>1.4. a) Ramps shall not be steeper than an angle of 20 degrees, that is 36,4 % to the horizontal for pigs, calves and horses (...)</p>
Space and height inside trailer	<p>Art. 6. Transport vehicles may consist of two floors.</p> <p>Art.15. The number of animals, the respective animal species, groups, divisions or live weight, that may be loaded on different means of transport and must be transported under the best possible conditions, must be closely related to the space available in the vehicle. The vehicle must not be overloaded with animals.</p>	<p>Art. 3 g) Sufficient floor area and height is provided for the animals, appropriate to their size and the intended journey;</p> <p>Annex I, Chapter VII, A. Domestic equidae Space allowances for animals shall comply at least with the following figures: Adult horses : 1.75 m2 Young horses (6 – 24 months) (for journeys of up to 48 hours): 1.2 m2 Young horses(6 – 24 months) (for journeys over 48 hours): 2.4 m2</p> <p>Annex I, Chapter III, 2. During transport 2.3. Equidae shall not be transported in multi-deck vehicles except if animals are loaded on the lowest deck with no animals on higher deck. The minimum internal height of compartment shall be at least 75 cm higher than the height of the withers of the highest animal.</p>
Protection from weather	<p>Art. 4 g) The vehicles must have a protective roof or an appropriate cover in case it is necessary to protect the animals for climatic reasons.</p> <p>Art.19. Animals must not be transported under extreme climatic conditions, but in case it proves to be necessary, they have to be transported with protection against cold, heat or rain.</p>	<p>Annex I, Chapter II, 1. Provisions for all means of transport 1.1 Means of transport, containers and their fittings shall be designed, constructed, maintained and operated so as to: b) protect the animals from inclement weather, extreme temperatures and adverse changes in climatic conditions;³²</p> <p>Annex I, Chapter VI, Additional provisions for long journeys (>8h) 3.1. Ventilation systems on means of transport by road shall be designed, constructed and maintained in such way that, at any time during the journey, whether the means of transport is stationary or moving, they are capable of maintaining a range of temperatures from 5 °C to 30 °C within the means of transport, for all animals, with a +/- 5 °C tolerance, depending on the outside temperature.</p>
Dividers	<p>Art. 4 e) Internal dividers are permitted in order to separate animals (...)</p>	<p>Annex I, Chapter VI, Additional provisions for long journeys (>8h)</p>

³² The German translation of EC 1/2005 concludes: “d.h. sie müssen stets überdacht sein” (i.e. they must **always be roofed**)

		<p>1.6. Equidae shall be transported in individual stalls except mares travelling with their foals.</p>
<p>Floor and bedding</p>	<p>Art.4 a) The floor has to be made of metal or a similar smooth material and be covered with a rigid grid with anti-slip property, which must be foldable to facilitate the cleaning and the drainage of the excrements, without faeces leaking onto the road during transport (...)</p>	<p>Annex I, Chapter II, 1. Provisions for all means of transport 1.1. Means of transport, containers and their fittings shall be designed, constructed, maintained and operated so as to: g) present a flooring surface that is anti-slip;</p> <p>Annex I, Chapter VI, Additional provisions for long journeys (>8h) 1.2. Animals shall be provided with appropriate bedding or equivalent material which guarantees their comfort appropriate to the species, the number of animals being transported, the journey time, and the weather. This material has to ensure adequate absorption of urine and faeces.</p>
<p>Maximum transport time, feed, water and rest</p>	<p>Art. 16. The animals are not allowed to stay inside the transporter for more than 36 consecutive hours, after which they have to be unloaded so they can rest, eat and drink during an appropriate length of time.</p>	<p>Art. 3 h) Water, feed and rest are offered to the animals at suitable intervals and are appropriate in quality and quantity to their species and size.</p> <p>Annex I, Chapter V, Watering and feeding interval, journey times and resting periods 1.4. c) Domestic Equidae may be transported for a maximum period of 24 hours. During the journey they must be given liquid and if necessary fed every eight hours;</p> <p>1.5. After the journey time laid down, animals must be unloaded, fed and watered and be rested for at least 24 hours.</p> <p>Annex I, Chapter VI, Additional provisions for long journeys (>8h) 1.3. The means of transport shall carry a sufficient quantity of appropriate feedingstuff for the feeding requirements of the animals in question during the journey concerned. The feedingstuffs shall be protected from the weather and from contaminants such as dust, fuel, exhaust gases and animal urine and dung.</p> <p>2.1. The means of transport and sea containers shall be equipped with a water supply that makes it possible for the attendant to provide water instantly whenever it is necessary during the journey, so that each animal has access to water.</p>

Annex 2: Comparison of Argentinian and EU regulations for the protection of animals at slaughter

Regulations

- Argentina: - DECRETO 4238/68 (Reglamento de Inspección de Productos, Subproductos y Derivados de Origen Animal)
 - Resolución N° 46/2014³³
- EU: - Council Regulation (EC) No 1099/2009 on the protection of animals at the time of killing, Chapters II and III³⁴

	DECRETO 4238/68, Resolución 46/2014	Council Regulation 1099/2009
Animal handling	<p>Chapter 32: Animal welfare is regarded as the state when, in relation to the surroundings, all needs are satisfied in a way that prevents the integrity of the animal's body and behaviour from being affected. Furthermore, appropriate accommodation, responsible treatment and humane slaughtering have to be guaranteed.</p> <p>Chapter 32, Article 2: Every activity from receiving on, throughout the time of holding and even after slaughter has to prevent the animals from suffering.</p> <p>Chapter 32, Article 5: All actions that cause suffering and stress, like loud sounds, screams, sudden movements, strange objects, lights and shadows, etc. shall be avoided.</p> <p>Chapter 32, Article 17: Implements causing harm or suffering to the animals are forbidden.</p>	<p>Chapter II, Article 3.1. Animals shall be spared any avoidable pain, distress or suffering during their killing and related operations.</p> <p>Chapter II, Article 3.2. For the purposes of paragraph 1, business operators shall, in particular, take the necessary measures to ensure that animals: (c) are handled and housed taking into consideration their normal behaviour; (d) do not show signs of avoidable pain or fear or exhibit abnormal behaviour;</p> <p>Annex III, Article 1.8. It shall be prohibited to: (a) strike or kick the animals; (b) apply pressure to any particularly sensitive part of the body in such a way as to cause animals avoidable pain or suffering; (c) lift or drag the animals by the head, ears, horns, legs, tail or fleece, or handle them in such a way as to cause them pain or suffering; however, the prohibition on lifting animals by their legs shall not apply to poultry, rabbits and hares; (d) use prods or other implements with pointed ends; (e) twist, crush or break the tails of animals or grasp the eyes of any animal.</p>
Use of electric prods	---	<p>Annex III, Article 1.9. The use of instruments which administer electric shocks shall be avoided as far as possible. In any case, such instruments shall only be used for adult bovine animals and adult pigs which refuse to move, and only when they have room ahead of them in which to move. The shocks shall last no longer than one</p>

³³ This chapter about animal welfare (chapter XXXII) was added to the "Reglamento de Inspección de Productos, Subproductos y Derivados de Origen Animal" approved by the DECRETO 4238/68 (http://www.senasa.gob.ar/sites/default/files/ARBOL_SENASA/INFORMACION/NORMATIVA/4238/capitulo_xxxii.pdf)

³⁴ According to Article 12, the requirements laid down in Chapters II and III of this Regulation also apply for imports from third countries.

		second, be adequately spaced and shall only be applied to the muscles of the hindquarters. Shocks shall not be used repeatedly if the animal fails to respond.
Competence of employees	Chapter 32, Article 12: (...) The operating personnel which are in contact with the animals have to understand the basics of animal behaviour .	Chapter II, Article 7.1. Killing and related operations shall only be carried out by persons with the appropriate level of competence to do so without causing the animals any avoidable pain, distress or suffering . Chapter II, Article 7.2. Business operators shall ensure that the following slaughter operations are only carried out by persons holding a certificate of competence for such operations , as provided for in Article 21, demonstrating their ability to carry them out in accordance with the rules laid down in this Regulation: (a) the handling and care of animals before they are restrained; (b) the restraint of animals for the purpose of stunning or killing; (c) the stunning of animals; (d) the assessment of effective stunning; (e) the shackling or hoisting of live animals; (f) the bleeding of live animals; (g) the slaughtering in accordance with Article 4(4).
Animal welfare officer	---	Chapter III, Article 17.1. Business operators shall designate an animal welfare officer for each slaughterhouse to assist them in ensuring compliance with the rules laid down in this Regulation . Chapter III, Article 17.4. The animal welfare officer shall hold a certificate of competence as referred to in Article 21, issued for all the operations taking place in the slaughterhouses for which he or she is responsible.
Holding pens	Chapter 32, Article 8: The slaughterhouses' areas for receiving, holding and resting have to come up with appropriate infrastructure and design which help to avoid or extenuate stress factors . Furthermore, they have to provide enough space, weather protection, equipment for transporting downer animals (for the	Chapter II, Article 3.2 For the purposes of paragraph 1, business operators shall, in particular, take the necessary measures to ensure that animals: (a) are provided with physical comfort and protection, in particular by being kept clean in adequate thermal conditions and prevented from falling or slipping ;

	<p>bigger species), drinking troughs and feeders in sufficient numbers and ventilation systems for the receiving areas for birds, amongst others.</p> <p>Chapter 32, Article 16: There has to be appropriate space for every animal to rest comfortably, to lie down and stand up easily. The surroundings have to be designed to protect the animals from physical and thermic discomfort.</p>	<p>Annex II, Article 1.1. Ventilation systems shall be designed, constructed and maintained so that the welfare of the animals is constantly ensured, taking into account the expected range of weather conditions.</p> <p>Annex III, Article 2.1. Each animal shall have enough space to stand up, lie down and, except for cattle kept individually, turn around.</p>
Weather protection	<p>Chapter 32, Article 4: The animals have to be protected constantly from inclement weather conditions during their stay in the slaughterhouse.</p>	<p>Annex II, Article 2.6. Where slaughterhouses have field lairages without natural shelter or shade, appropriate protection from adverse weather conditions shall be provided. In the absence of such protection, these lairages shall not be used under adverse weather conditions.</p>
Water supply	<p>Chapter 32, Article 6: The animals have to be provided with potable water at discretion and with feed if the time they have been without food exceeds 24 hours.</p>	<p>Annex II, Article 2.3. The water supply system in pens shall be designed, constructed and maintained so as to allow all animals at all times access to clean water without being injured or limited in their movements.</p> <p>Annex III, Article 1.6. Mammals, except rabbits and hares, which are not taken directly to the place of slaughter after being unloaded, shall have drinking water available to them from appropriate facilities at all times.</p>
Feeding and bedding	<p>Chapter 32, Article 6: The animals have to be provided with potable water at discretion and with feed if the time they have been without food exceeds 24 hours.</p>	<p>Chapter II, Article 3.2. For the purposes of paragraph 1, business operators shall, in particular, take the necessary measures to ensure that animals: (e) do not suffer from prolonged withdrawal of feed or water;</p> <p>Annex III, Article 1.2. Animals which have not been slaughtered within 12 hours of their arrival shall be fed, and subsequently given moderate amounts of food at appropriate intervals. In such cases, the animals shall be provided an appropriate amount of bedding or equivalent material which guarantees a level of comfort appropriate to the species and the number of animals concerned. This material shall guarantee an efficient drainage or ensure adequate absorption of urine and faeces.</p>

Flooring	---	Annex II, Article 2.5. Floors shall be built and maintained in such a way as to minimise the risk of animals slipping, falling or injuring their feet.
Animal welfare inspections	Chapter 32, Article 13: The areas where control is crucial are: a) Receiving of the animals b) Unloading of the animals c) Holding at the plant d) Movement at the plant e) Entry to the slaughter hall, immobilization and restraining f) Stunning and slaughter	Annex III, Article 2.5. The condition and state of health of the animals in a lairage shall be regularly inspected by the animal welfare officer or a person having appropriate competence.
Protection from injury	Chapter 32, Article 14: The buildings have to be designed and constructed with regard to the animals' security and well-being and have to be regularly inspected and preventively maintained, avoiding the presence of pointed or broken elements which could cause lesions or stress.	Chapter II, Article 3.2. For the purposes of paragraph 1, business operators shall, in particular, take the necessary measures to ensure that animals: (b) are protected from injury; Annex II, Article 1.3. Lairage facilities shall be designed and constructed so as to minimise the risk of injuries to the animals and the occurrence of sudden noises. Annex III, Article 2.2. Animals shall be kept securely in the lairage and care shall be taken to prevent them from escaping and to protect them from predators.
Ramps	---	Annex II, Article 2.2. Ramps and bridges shall be equipped with lateral protection to ensure that animals cannot fall off.
Unloading	Chapter 32, Article 7: Once the vehicle has entered the slaughterhouse, unnecessary waiting time inside the transporter has to be avoided.	Annex III, Article 1.2. Animals shall be unloaded as quickly as possible after arrival and subsequently slaughtered without undue delay. Mammals, except rabbits and hares, which are not taken directly upon arrival to the place of slaughter, shall be lairaged.
Isolation pens	Chapter 3, Article 15.4: The slaughterhouse will have a pen for the isolation of ill animals or animals assumed to be ill , built according to the conditions described in paragraphs 3.2.6, 3.2.7 and 3.2.8 of this Regulation and with a minimum surface of ten square meters.	Annex III, Article 2.4. Every day that the slaughterhouse operates, before any animal arrives, isolation pens for animals that require specific care shall be prepared and kept ready for immediate use.

<p>Assessment of welfare conditions at arrival</p>	<p>Chapter 32, Article 3: Animals in a disabled condition, be it from stress, giving birth, trauma, injury etc., have to be handled in a special way, in order to compensate for their suffering.</p>	<p>Annex III, Article 1.1. The welfare conditions of each consignment of animals shall be systematically assessed by the animal welfare officer or a person reporting directly to the animal welfare officer upon arrival in order to identify the priorities, in particular by determining which animals have specific welfare needs and the corresponding measures to be taken.</p>
<p>Emergency killing</p>	<p>Chapter 32, Article 8: The slaughterhouses' areas for receiving, holding and resting have to come up with appropriate infrastructure and design which help to avoid or extenuate stress factors. Furthermore, they have to provide enough space, weather protection, equipment for transporting downer animals (for the bigger species), drinking troughs and feeders in sufficient numbers and ventilation systems for the receiving area for birds, amongst others.</p> <p>Chapter 10, Article 2.7: Heavily injured animals have to be slaughtered in the emergency room.</p> <p>Chapter 10, Article 4.1: The veterinary inspection will dispose the immediate slaughter of downer animals and determine in each case if it will happen in the slaughter area or in the emergency yard.</p> <p>Chapter 10, Article 4.2: If the Veterinary Inspector authorizes the transfer of dead or moribund animals to the slaughter area, this takes place with help of a vehicle exclusively used for the purpose. The vehicle has to be covered with a metal which is rustproof and easy to clean.</p> <p>Chapter 10, Article 5: If it is necessary for humane or other reasons established in this regulation, the veterinary inspection can dispose the slaughter of animals in the emergency area without considering the slaughtering routine.</p>	<p>Annex III, Article 1.11. Animals which are unable to walk shall not be dragged to the place of slaughter, but shall be killed where they lie.</p>

<p>Restraining</p>	<p>---</p>	<p>Annex II, Article 3.1. Restraining equipment and facilities shall be designed, built and maintained to:</p> <ul style="list-style-type: none"> (a) optimise the application of the stunning or killing method; (b) prevent injury or contusions to the animals; (c) minimise struggle and vocalisation when animals are restrained; (d) minimise the time of restraint.
<p>Stunning</p>	<p>Chapter 32, Article 13: The areas where control is crucial are: e) Entry to the slaughter hall, immobilization and restraining f) Stunning and slaughter</p> <p>Chapter 32, Article 18: Only slaughter methods which cause a state of insensibility and unconsciousness as fast as possible are allowed, using facilities authorized by SENASA, which have to be maintained in a daily manner. Each slaughterhouse has to have one stunning facility for the daily slaughter, a second one for replacement and incidents of inadequate stunning and another portable one for slaughter in emergency rooms, for sick animals, injured animals, downer animals, animals in groups, in corrals or in transport trailers.</p>	<p>Chapter II, Article 4.1. Animals shall only be killed after stunning in accordance with the methods and specific requirements related to the application of those methods set out in Annex I. The loss of consciousness and sensibility shall be maintained until the death of the animal. The methods referred to in Annex I which do not result in instantaneous death (hereinafter referred to as simple stunning) shall be followed as quickly as possible by a procedure ensuring death such as bleeding, pithing, electrocution or prolonged exposure to anoxia.</p> <p>Chapter II, Article 5.1 Business operators shall ensure that persons responsible for stunning or other nominated staff carry out regular checks to ensure that the animals do not present any signs of consciousness or sensibility in the period between the end of the stunning process and death.</p> <p>Chapter II, Article 9.2. Business operators shall ensure that during stunning operations appropriate back-up equipment is immediately available on the spot and is used in the case of failure of the stunning equipment initially used. The back-up method may differ from that first used.</p> <p>Chapter II, Article 9.3. Business operators shall ensure that animals are not placed in restraining equipment, including head restraints, until the person in charge of stunning or bleeding is ready to stun or bleed them as quickly as possible.</p>

<p>Guides to good practice</p>	<p>Chapter 32, Article 10: The Official Service will develop specific procedural guidelines for controlling the application of the Animal Welfare criteria, keeping in mind the implementation of the objectives recommended in the present chapter.</p> <p>Chapter 32, Article 12: The slaughterhouses have to develop their own Animal Welfare Manual for application and control, suiting the respective characteristics of every slaughterhouse. The operating personnel which are in contact with the animals have to understand the basics of animal behaviour.</p>	<p>Chapter II, Article 13.1. Member States shall encourage the development and dissemination of guides to good practice to facilitate the implementation of this Regulation.</p>
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