

Production of horsemeat in Argentina & Uruguay

October - December 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 and Uruguay since 2012. Between February 2013 and June 2014, all Swiss supermarkets reacted to our findings and stopped selling horsemeat from overseas; 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. Jumbo also found the conditions at Lamar slaughterhouse to be unacceptable and immediately stopped purchasing meat from that plant.

In April 2014, the inspection company SGS¹ 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 – commissioned by and on behalf of Swiss importers – and the certificate remains valid until the present day. However, the certificate relates to the management and not to the production.

Currently, EU and Swiss horsemeat importers are trying to make horsemeat from South America acceptable again. In addition to the certification of slaughter plants by SGS, they have created a “research” project called Respectful Life² and have entrusted the Catholic University of Leuven (KU Leuven) with on-site visits in Argentina and Uruguay. Between October to December 2017, we returned to the most important horse slaughterhouses in both countries in order to assess if improvements had been done, and 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, had any positive impact.

However, the conditions were as bad as in the previous years, or even worse. Many horses were in a deplorable condition: injured, lame, weak or sick, very thin or severely emaciated. 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 slaughterhouses in the first place. Or, if the injury had happened during transport, they should have been emergency killed right upon arrival. In fact, in the plants visited these horses were left in the waiting pens for days before being relieved from their suffering. At Lamar slaughterhouse in Argentina, an injured horse was left to die a slow and painful death on the slaughterhouse premises, instead of receiving medical assistance or being euthanized. We have been documenting horses dying from their injuries or from disease at Lamar since 2012, but the plant is still approved to export horsemeat to the EU and Switzerland. At the collection centre of Clay slaughterhouse in Uruguay, we observed seriously injured horses kept there for one month and longer. It is completely unacceptable to let injured animals suffer for days and weeks instead of relieving them from pain. According to the assessment of a German equine veterinarian³ who we showed our footage to, many horses at the slaughterhouses have to endure extreme pain, should not have been transported due to pre-existing injuries or should not have been accepted for slaughter due to cachexia and signs of deficiency.

Furthermore, there is still no weather protection for the large majority of the horses at all plants visited, and the handling by employees and drivers remains unprofessional and rough. We repeatedly observed horses being hit, poked with sticks and splashed with strong water jets into their faces.

Our findings are very different from the above-mentioned study of the KU Leuven and SGS audits. This is certainly because our investigations are unannounced and covert. Announced audits will never show everyday business because the slaughterhouses have plenty of time to prepare for the audit, to get rid of horses in poor condition and inform their personnel accordingly or replace them. 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. Furthermore, it was striking that after the announced visits of the KU

¹ Société Générale de Surveillance SA

² www.respectfullife.com

³ Dr. med. vet. Petra Ohnemus, Director of the renowned horse hospital “Pferdeklinik an der Rennbahn” in Iffezheim

Leuven, we found a particularly large number of horses in poor condition in the holding pens of Lamar. This might be an indication that they were deliberately held back during the visit to be delivered afterwards. European importers speak of best-quality horsemeat, we rather speak of “rotten meat on four hooves”, as the slaughtered horses are in unbelievably bad condition, emaciated, with signs of deficiency or other conditions, with inflamed injuries, chronic and infected wounds, etc.

In addition to serious animal welfare concerns, consumer safety is at risk with horsemeat from Argentina and Uruguay. Identification by ear tags is a very unreliable means of traceability and leads to cheating, as described in this report on pages 40-44. These countries have no system of traceability comparable to that of the EU, where horses are microchipped and have an equine passport showing their medical history. In Argentina and Uruguay, horses are not commercially bred for meat production. The slaughtered horses are animals that no longer fulfil their purposes because of old age, illness or injury or are no longer wanted for other reasons. Thus, the horses slaughtered at EU-approved plants come from very different sources. A lot of horses are traded through auctions and markets, and their origin often remains unknown. Some horses come from blood farms, where blood is extracted from pregnant mares until they are worn-out. The mares who do not die in the process are sold to the slaughterhouses. Other horses come from long-distance horse races (“raids”) and rodeos (“jineteadas”). These horses are severely abused and, when injured, they are sent to slaughter, even if they are unfit for transport and should be euthanized on the spot.

Neither Argentina nor Uruguay have appropriate legislation for the protection of animals during transport. Transport vehicles are inadequate for the transport of horses, especially over long distances (lack of roof, no individual stalls, lack of water system, etc.). In both countries, horses are transported in cattle trucks which frequently causes head injuries to horses because the trap-doors and crossbars are too low for them. In general, transport distances are shorter in Uruguay than in Argentina, however, Uruguayan slaughter plants also import live horses from Brazil. For these horses, the transport time can be extensive. Although the EU imposed an import ban on horsemeat from Brazil in 2017, Brazilian horses still enter the food production process for the EU with a detour via Uruguay.

Besides horses that are legally imported from Brazil, thousands of these animals are illegally shipped over the border. A police investigation carried out in April 2015 uncovered that during the previous three years, three farmers had smuggled more than 2'000 horses from Brazil over the border, equipped them with fraudulent documentation and sold them to EU-approved slaughterhouses Clay and Sarel. According to the police, this is just the tip of an iceberg and they expect to uncover much more because of the special characteristics of the green border between Brazil and Uruguay (see newspaper article in Annex 4). The latest EU audit report on Uruguay from 2016 confirms that “the smuggling and theft of live animals, predominantly horses, but also cattle and sheep, originating from the neighbouring Brazilian State of Rio Grande do Sul is a real problem: therefore a special police brigade called Brigada Especial para la Prevencion y Represion del Abigeado (BEPRA) was created in 1995.”⁴

Our investigations are going on constantly, as we have not seen any improvements since 2010, when our partner organisation GAIA conducted the first investigation in Argentina.

Link to the film 2017:

English: <https://www.youtube.com/watch?v=uX7trEy9ctE&t=227s>

German: https://www.youtube.com/watch?v=4uk_nJUKxD0

Link to the film 2018: still in production

⁴ EU audit report 2016 on Uruguay: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3793

II. Observations in Argentina

1. Slaughterhouse Lamar

Address:

Frigorífico Lamar
 Ruta 5 km 93
 Mercedes
 Provincia de Buenos Aires

EU approval number: 1451

Monday, 20.11.2017

When we arrive at the slaughterhouse Lamar near Buenos Aires at 11:00, it is **raining heavily** and the temperature is 15°C. Like in the past years and despite our numerous complaints, the **large paddocks behind the plant still offer no shelter from sun and rain**. The small holding pens next to the lairage area, which were partly roofed with a fabric in December 2016 but roofless in June 2017, also still offer no weather protection. The **fabric roof has still not been replaced**. In the lairage area, where the horses are kept for many hours before slaughter, only about half of the pens are underneath the roof, the rest of the pens are not covered.

Today we observe at least 300 horses, possibly even more. They are kept in four different areas:

1. Large paddocks with dirt/mud ground and **no shelter**
2. Small holding pens with dirt/mud ground and **no shelter** (used to be partly covered by a fabric roof)
3. Lairage area with concrete floor, **only partly roofed**
4. Paddock with little grass growing and a bit of shade from surrounding trees



Different areas where horses are kept before slaughter

During our observation today, from 11:00 until 19:40, we do not hear any banging noise nor see any smoke coming out of the slaughterhouse, what indicates that no slaughter is taking place. During our last investigation in June 2017, we observed that slaughter started around 6:00 and stopped in the late morning.

When we start our observation at 11:00, there are only a few groups of horses in the lairage area, most are in the large paddocks. Between 11:30 and 12:00, an employee on horseback is observed moving one group of horses after the other from the paddocks over to the lairage. We note that a dark bay horse is severely injured and cannot bear any weight on the left hind leg. The animal is **limping on three legs** and struggling to follow the group. Although there are still empty pens in the roofed part of the lairage, most horses are put into the **uncovered front pens that offer no protection from the heavy rain**. At noon, the large paddocks are completely empty.

At 12:30, the same employee on horseback moves horses from the small holding pens over to the lairage area. Five minutes later, another employee on foot moves a large group of horses from these pens to the lairage, which is now **very crowded, leading to stress among the animals**. Several horses are observed repeatedly biting others standing around them. **Aggressive animals should be separated from their group**.



Crowded pens in the front & empty pens in the back

Horses fighting in overcrowded pen

At 12:40, a new group of horses is moved into the small holding pens next to the lairage, and another group is moved over to the far end of the large paddocks. They have likely just been unloaded. At 12:50, another new group is released into the paddocks, among them a black mare with a large open wound on the hind leg. There is **only one feeding place with hay in each paddock**, and soon the hungry animals start **fighting for food**. Lower ranking horses are **chased away by dominant ones**. A white horse is observed repeatedly biting and kicking others at the feeding place. The hay has been carelessly dropped onto the dirty ground, as there are no hay racks or feed troughs available in the paddocks. The **floor is very muddy** from the heavy rain. Because there is no shelter for the horses, they are **soaking wet and several are trembling**, which could be a sign of either cold or pain.



Complete lack of weather protection

Horses being chased away from feed

A lot of horses that have just arrived are in very poor condition. Several are **extremely emaciated** and would therefore be unfit for slaughter for human consumption⁵. The **black mare with a severe open wound** on the left hind leg would not have been fit for transport (see first photo below). She is lame, indicating that she is experiencing pain, and her lower leg is heavily swollen. The large wound looks almost black and has probably existed before transportation. At the very latest, the mare **should have been emergency killed immediately after arriving at the slaughter plant**, according to applicable EU requirements⁶. Instead of being released from further suffering, she is **left in the waiting area for several days**. Despite our numerous complaints over the past years, injured and weak horses are still not separated from the others in order to be examined by a veterinarian, cared for or if necessary emergency killed.

In the same group, we observe a chestnut who is **severely lame** in the left front leg. When standing still, he **constantly holds the leg up, what is a clear sign of pain**. We detect an emaciated white gelding with an injured front leg, holding it in a relieving posture that indicates pain. When we later see him walking, it becomes evident that he is lame, moving the head up and down. A bay horse also has an **injured front leg, stretching it out in a relieving posture and lifting it up repeatedly, indicating pain**. Such injuries could have occurred during transport. However, if they had existed before, the horses should have been excluded from transportation, being unable to move without pain.

A grey horse has **severely overgrown hooves and great difficulty walking**. All four hooves have not been trimmed for a long time and the horse is obviously experiencing pain. Many other horses we see in the paddocks also have **long and neglected hooves**, some 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.



Mare with severe open wound on hind leg



Horse with long hooves having troubles walking



Extremely emaciated mare



Chestnut holding up painful leg

⁵ 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 (see Chapter IV page 56)

⁶ The requirements laid down in Chapters II and III of Regulation (EC) 1099/2009 on the protection of animals at the time of killing apply in third countries (see Chapter IV page 62)



Emaciated horse holding leg in relieving posture



Horse repeatedly lifting up injured leg

We observe a small group of five horses and one pony in the small pens next to the lairage. The rest of these pens are now empty. We note that a **bay horse has no ear tag**, and 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 tags**⁷.

According to Argentinian law, Resolución No 146/2010⁸, horses destined for slaughter are required to be marked with ear tags at the slaughter horse collection centre, so-called “acopio”. For many years, we have been pointing out that the **Argentinian system of traceability is unreliable** and therefore opens the door to fraud. In addition to receiving untagged horses, which by itself is a violation of Resolución No 146/2010, we filmed Lamar cheating by applying ear tags to unidentified horses on premises of their slaughterhouse in June 2017. **Lamar is part of a system in which fraud is widespread and common.**



Bay horse without slaughter ear tag

At 14:30, an employee starts hosing down the horses in the lairage area, a procedure that we have observed many times at Lamar. He is seen **spraying water also on the horses’ heads. They become very agitated and nervous.** Some are very frightened or even panic and try to escape from the employee and the strong water jet. The agitated animals **now bite each other more frequently.** A horse is observed biting another forcefully in the neck and does not let go for several seconds.

In one of the lairage pens, we see the head of a bay horse who is **lying down right at the edge of the overcrowded pen**, likely in an attempt to avoid being trampled. At 15:45, more than one hour after we first saw the horse, the employee who is hosing down the horses finally approaches the weakened, possibly injured animal, who is now lying flat underneath the gate. He opens the gate, **pulls the animal’s head up by the ears,**

⁷ In 2013, we published a report in German about slaughter of stolen horses in Argentina: “Hehlerware Pferdefleisch aus Argentinien”

⁸ Resolución 146/2010, Annex VI, Procedimiento de identificación (see Chapter V page 66)

closes the gate and walks away. We do not see him come back with veterinary assistance, what would be his duty. Moreover, the downer horse seriously risks being trampled by his agitated comrades in these crowded conditions.



Horses frightened by employee & water jet



Horse biting another hard in the neck



Weak, possibly injured horse lying on the floor



Worker pulling the exhausted animal up by the ears

Even though we can only see the upper part of the bodies of the horses in the lairage pens, we can still tell that many are in poor condition. We detect two horses that have **bleeding head injuries, which likely occurred during transport**. In Argentina, horses are transported in cattle trucks which frequently cause head injuries to horses because the trap-doors and crossbars are too low for them. A white horse has **open cuts around the left eye that look infected**. We see a bay horse with hairless spots on the neck and head that look like a skin disease, possibly a fungal infection. Another bay horse has a large abrasion on his back. A dun horse has a **bleeding abrasion on his shoulder and several cuts on his forehead**, while other horses have bleeding cuts on their heads too, likely from transport. Furthermore, we detect a lame horse, moving the head up and down when walking, as well as a chestnut with a grey layer in one eye, who is probably blind in that eye. A very thin chestnut with prominent spine and hip bones would likely be **unfit for slaughter because of emaciation**⁹.

We notice that there are some donkeys or mules among the much taller horses in the crowded pens. Mixing equines of different sizes does not only pose a risk of injury for the smaller ones during transport, but also in overcrowded holding pens.

A horse is observed mounting in the lairage area. If it is a stallion, it is unacceptable that **stallions are mixed together with mares**. If it is not a stallion, mounting is clearly a sign of high stress resulting from overcrowded conditions, high noise level coming from the slaughter plant, hosing down the horses, etc. Mounting poses a considerable risk of injury in the lairage pens which have a slippery concrete floor. Moreover, the fence between pens is not solid but consists of metal bars, where the horses' legs can easily get trapped.

⁹ 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 (see Chapter IV page 56)



White horse with cuts around the eye



Chestnut with bleeding head injury



Dun horse with bleeding wound on shoulder



Horse mounting in the lairage

At 17:22, it has stopped raining. An employee is still hosing down the horses in the lairage. At 17:42, another employee is observed hitting horses with his flag, trying to move them out of the pen, but the horses refuse. He keeps **hitting the last ones, even though they cannot move forward because their way is blocked**. After a while, the employee with the water hose comes to his assistance. He **aims the strong water jet at the animals' faces**, what frightens the already agitated horses. The whole procedure is very chaotic, and the **handling is as unprofessional and rough as witnessed during our past visits**. When the horses finally walk out of the pen, they are not moved into the building but into another pen in the lairage. We detect a foal with ear tag in between the adult horses. It must be assumed that the much smaller young animal has been transported together with the adult ones. In Argentina and Uruguay, foals and small equines are usually not separated from larger animals during transport. In the EU, foals and donkeys/mules would have to be transported separately, as the risk of them being trampled is very high¹⁰.



Hitting horses who cannot move forward



Splashing strong water jet at horses' heads

¹⁰ Article 1.12 of Chapter III of Annex I of EC 1/2005 provides that "Animals shall be handled and transported separately in the following cases: (b) animals of significantly different sizes or ages"



Chaotic and unprofessional handling



Foal among much taller adult horses

At 19:05, the washing of horses in the lairage has stopped. We do not see any horses eating in the lairage area, and it is uncertain if they have access to water. The animals have been in these pens since noon. As we have not seen any slaughter activities since 11:00, it looks like they have been washed in preparation for slaughter the next day. This means that the **horses stay in the small, overcrowded lairage pens for half a day and one night without food, and possibly also without water.**

The horses in the large paddocks have almost finished eating the hay bales. **One hay bale per enclosure is clearly insufficient for the number of horses.** The hay has been **spread out on the dirty and muddy floor.** We observe high-ranking horses chasing others away from the little hay that is left. There should be several feeding places so that all animals can access the food, and it should be kept clean in racks or troughs, which ideally should be covered against the rain.



Insufficient feed spread out on muddy floor



Dominant horse chasing another away from hay

At 19:20, a new group of horses is moved to the far end of the paddocks. A truck has likely just been unloaded. A gelding in this group has a **severe open wound** at the hock of the right hind leg. The wound looks **infected and is heavily swollen.** This horse should not be moved into the waiting area, but be emergency killed without delay. A bay mare in the same group appears to be pregnant.



Gelding with severe open wound on hind leg



Mare that looks pregnant

When we leave Lamar at 19:40, all activities have stopped. The lairage is full of horses that stay there overnight.

Tuesday, 21.11.2017

When we return to the slaughterhouse Lamar at 14:05, we observe an empty truck being washed and then leaving. It is a typical cattle truck, open-roofed and with low trap-doors and crossbars. This type of vehicle is completely inappropriate for the transport of horses.

Today it is not raining anymore, and the sun is shining. We observe a group of horses in the paddock next to the unloading area. They gather under the shade from surrounding trees. Most of the large paddocks behind the plant, which offer no shelter from the sun, are empty, while the lairage area is again very crowded.

At 15:10, we detect the **black mare with the severe open wound on the left hind leg**, who we first saw at 12:50 the day before. She has been **left behind alone in the paddock** and is lying flat on the ground. Her wound is black and full of flies. It becomes evident that **she is dying**. In her death struggle, she stretches out her four legs in agony and breathes heavily, her lips cramped. A few minutes later, she is dead. It can be excluded that she has not been noticed by slaughterhouse staff, as her comrades have been moved over to the lairage area. The employee moving the horses must have seen and deliberately ignored her.

It is important to note that horses can die very fast once germs spread throughout the whole body via the bloodstream (e.g. blood poisoning). When we first saw this mare the day before, she was slightly lame but did not appear to be very weak or close to death. 26 hours later, she died. According to the equine veterinarian Dr. med. vet. Ohnemus¹¹, the mare might have died so quickly due to an organ failure or colic resulting from severe pain and distress.

It is totally unacceptable that horses are **left to die a slow and painful death** on the slaughterhouse premises, instead of receiving medical assistance or being euthanized. We have been documenting **horses dying at Lamar since 2012**, but the plant is still approved to export horsemeat to the EU and Switzerland.

¹¹ Dr. med. vet. Petra Ohnemus is the director of the renowned horse hospital "Pferdeklinik an der Rennbahn" in Iffezheim, Germany



Mare dying, stretching out her legs



Wound is black and full of flies



Mare has died without human intervention

At 15:22, we observe the horses that were unloaded yesterday, among them the group of the dead mare, in the lairage area. An employee is **hosing them down and splashing water into their faces. They are crowded, agitated, some are biting.** The horses that we saw in the lairage the day before are gone, they must have been slaughtered during the night or in the morning. During our last investigation in June 2017, slaughter started around 6:00 in the morning and was over at noon.



Employee aiming water jet at horses' heads

At 15:42, another employee walks from the buildings over to the dead mare in order to **check her death.** The staff seems to be well aware that they have left a dying animal behind. The employee, talking on the phone, hits the mare twice with his flag and then steps on her neck to make sure that she is dead. Convinced that she is, he walks away.

The gelding with the **severe open wound** at the hock of the right hind leg, who arrived the previous evening at 19:20, is still in the same paddock. He has been left there for **more than 20 hours without any veterinary care.** The wound looks untreated. In the same group, we detect a horse with **overgrown, seriously neglected hooves.**



Employee checking the mare's death



Gelding with open wound still in same paddock

At 16:05, an employee moves a group of horses from a far-end paddock over to the lairage, among them the injured gelding with the open wound at the hock, a bay horse that is **severely lame in the left hind leg** and **two pregnant mares**.

The small group of one pony and five horses, one of which has no ear tag, is still in the same holding pen next to the lairage. The rest of these pens are empty today.

At 16:40, two mares with very young foals are released into the paddock area. We note that **one foal still has the umbilical cord**. Most likely the mares and foals have just been unloaded, as we have not seen them before. It is also possible that the foals have been born at the slaughterhouse and kept in another pen until now. In any case, it would be **prohibited in the EU to transport highly pregnant mares (over 90 % of gestation) or new-born animals** in which the navel has not completely healed. The two mares, one of which is **extremely emaciated** with prominent hip bones and spine, are tagged for slaughter. There is a third horse in their enclosure, a pinto gelding, that has **no ear tag**.



Two mares with young foals, one emaciated



Foal with umbilical cord

At 17:00, the last group of horses is moved from the paddock area over to the lairage. Many horses are thin, a white horse is **emaciated with ribs and hip bones clearly visible**, and **at least one horse is lame**. The paddocks are now empty, except for the two mares with foals and the pinto gelding, while the **lairage is extremely overcrowded**, like the evening before. An employee is still hosing down horses with water.



Emaciated white horse being moved to the lairage

At 18:10, two employees drive a tractor to the dead mare in order to remove her. They put chains around her legs to tow the body. We leave the plant shortly afterwards.



Employees removing dead mare

Like yesterday, no slaughter took place during our observation this afternoon. Slaughter seems to be done only in the morning. The general procedure at Lamar seems to be the following: After unloading, the horses spend the rest of the day and one night in the large paddocks behind the plant. On the second day, they are moved over to the lairage at noon or in the afternoon and hosed down with water. They are **slaughtered only on the third day, after spending more than 12 hours in the overcrowded lairage pens, without feed** and possibly even without water. Over the past years, we observed many times that this procedure is not speeded up for suffering horses, but that they stay in their group until the very end.

Thursday, 23.11.2017

Today we spend the whole afternoon on the road waiting for trucks to deliver horses at Lamar, but do not see any. At 16:30, we quickly check on the horses in the large paddocks behind the plant. The paddocks are empty, except for the **emaciated grey mare with her young foal** and the pinto gelding without ear tag that we already saw two days ago. The second mare and her new-born foal are nowhere to be seen, and we wonder what has happened to them.

It is very windy and about to rain. However, there is **no weather protection whatsoever for the young animal and his mother, not even a wind break**. Especially the foal is clearly disturbed by the strong wind and searches for his mother's protection.



No protection against heavy winds

Friday, 24.11.2017

When we return to the slaughterhouse Lamar at 17:00, there are several groups of horses in the paddock area behind the buildings. Today is Friday and it must be expected that the horses stay in the paddocks over the entire weekend, regardless of their condition. We detect a chestnut that has a **severe head injury exposing the bone, which likely occurred during loading or unloading on a cattle truck** as the trap-doors are much too low for horses. Furthermore, we see a **lame and extremely emaciated gelding** with prominent backbone and pelvis, who has a **large gaping wound** at the hock of the left hind leg, which is swollen. He should never have been transported to the slaughterhouse in the first place, as he is emaciated and weak, injured and unable to move without pain. At the very latest, he **should have been emergency killed immediately upon arrival at the plant**, according to applicable EU requirements¹². The gelding should also be considered **unfit for slaughter because of severe emaciation**¹³.

In another paddock, we observe a bay **stallion with a large swelling on his flank and two severely lame mares**. One of them is first lying down, probably because her hind leg is hurting, and is later seen standing up with difficulties. Once again, we note that **stallions are mixed together with mares**.

¹² The requirements laid down in Chapters II and III of Regulation (EC) 1099/2009 on the protection of animals at the time of killing apply in third countries (see Chapter IV page 62)

¹³ 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 (see Chapter IV page 56)

Back in Europe, we show the footage of these three horses to a **German veterinarian** for assessment. We would like to know if they were fit for transport and for slaughter. We ask Dr. med. vet. Claudia Eggert, who worked for 15 years as an official veterinarian in a slaughterhouse in Germany, where she supervised horse slaughter.

According to Dr. Eggert, the black-and-white mare is severely lame in her right hind leg. She can bear almost no weight on it when walking, only the point of the hoof touches the ground. When standing still, she **lifts the leg up repeatedly, which is a sign of severe pain**. The mare is **unfit for transport** because she cannot move without pain. Moreover, her hooves are very neglected.

The white mare is extremely lame in the right hind leg and does not bear any weight on that leg when walking. She relieves the painful hind leg when standing still, lifting it up repeatedly. The **length of the hoof indicates that this painful condition has existed over a longer period of time**. Dr. Eggert believes that the mare also feels pain in the other hind leg. The **abdominal wall is permanently raised, which clearly indicates severe pain**. This horse is **neither fit for transport nor for slaughter**, according to the veterinarian.

The bay stallion has a **round, bulging growth on his left flank**. According to Dr. Eggert, this could be a haematoma, an abscess, an oedema or an abdominal hernia. The stallion **should be slaughtered separately**, and a veterinarian would have to closely inspect the carcass in order to decide if the meat is fit for human consumption.



Extremely lame mare with overgrown hoof



Lame mare lifting up her painful hind leg



Stallion with growth on his flank



Severe head injury exposing the bone

In addition to the injured horses, we observe a chestnut and a black mare that are **heavily pregnant**. Their udders are enlarged, indicating that they are due to deliver their foals soon. As already explained further above, it would be **prohibited in the EU to transport pregnant mares that are over 90 % of gestation**. Furthermore, we notice that the floor of the paddock area is covered in manure and wonder if it is ever cleaned out.

Monday, 4.12.2017

Ten days later, after visiting the slaughterhouse General Pico and investigating about Lamar's suppliers of horses, we return to Lamar. When we arrive at 8:40, we observe a group of horses in the paddock next to the small road, and many more horses in **pens close to the unloading ramp**. It is the first time we see horses in these pens. They have likely just been unloaded. These pens are **small, crowded, and offer no weather protection**.



Crowded pens without shelter

At 9:20, we quickly check on the horses at the back of the plant. Slaughter is underway, as shown by the smoke coming out of the buildings and a bad odour. As we presumed, slaughter takes place in the morning, which is still the same procedure as in June.

The large paddocks are empty, except for the emaciated grey mare, her foal and the pinto gelding already seen on 21st November. The foal is standing in a separate pen, he might have slipped underneath the fencing. The three horses are standing close together with the fence in between. **The young foal is very thin with his ribs clearly visible, and it is unacceptable for him to be separated from his mother, as he is still on a milk diet.**



Smoke indicating that slaughter is underway



Thin foal separated from his mother

The small holding pens next to the lairage are very crowded. We notice a white horse with a **bleeding head injury**. **His right hind leg is covered in blood and swollen**. A chestnut also has a bleeding injury on the forehead. Such head injuries often occur during transport on **inappropriate cattle trucks** with low trap-doors and crossbars.



Horse's head and leg covered in blood



Another horse with head injury

At 19:20, we document a **truck loaded with horses entering the premises of Lamar**. The truck belongs to the company "El Turquito". It is a typical Argentinian livestock transporter, approved by SENASA¹⁴, that has no roof and thus offers **no protection from adverse weather conditions**. The vehicle consists of a lorry and trailer and has a capacity for approximately 40 horses. The lorry has just one and the trailer two compartments, thus the horses are transported in three groups. The vehicle has four trap-doors: one at the exit, one as a divider inside the trailer and two between lorry and trailer. The **trap-doors are much too low for horses, since Argentinian livestock trucks are designed for cattle, posing a high risk for injuries**. We regularly find horses with bleeding head injuries in the waiting pens of slaughterhouses in Argentina and Uruguay, which probably have occurred during transport.

We do not know where the horses have been loaded, but transport distances in Argentina are generally long. The animals appear to be crowded. They are **not transported in individual stalls, as required in the EU for journeys of more than eight hours**, and ranking fights during transport may lead to **stress, injuries or death by trampling**.



Truck with horses arriving at Lamar slaughterhouse

¹⁴ Servicio Nacional de Sanidad y Calidad Agroalimentaria

2. Slaughterhouse General Pico

Address:

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

EU approval number: 2009

Sunday, 26.11.2017

When we arrive at the slaughterhouse General Pico outside Río Cuarto at 10:30, we observe a group of approximately 30 horses in a paddock about 200 meters away from the plant. The horses in the holding pens next to the buildings cannot be seen from the road, as a **tall fence with visual cover** blocks the view. Nevertheless, we manage to get a view of the premises.

Today we observe several hundred horses altogether in these two locations:

1. Small holding pens with dirt/mud floor, **less than half of the pens are partly covered by a fabric roof**
2. Large paddocks with little grass growing, **no man-made shelter**, insufficient shade available from surrounding trees



Different areas where horses are kept before slaughter

Like during our last visit in June 2017, 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. It is hot today with temperatures climbing up to **34°C**, and unacceptable that **all horses have been placed into unroofed pens, while the pens providing shade are empty**. All animals are standing in the blazing sun. Moreover, most of the pens are **very crowded, which results in horses biting**. Weak and submissive animals have **no possibility of retreat** in overcrowded pens.



Horses kept in crowded pens without shade

Today is Sunday and it must be assumed that the horses have stayed in the waiting pens over the entire weekend, regardless of their condition. We detect a horse whose **fetlock is heavily swollen** on the left hind leg. In the same pen, a chestnut is observed **lying flat on the ground without moving**, while the other horses are all standing. We cannot tell if the horse is just exhausted or injured. A bay horse has an **open, bleeding wound at the knee** of the left front leg. The injury looks fresh and has likely occurred during transport. The horse's hoof is covered in blood. A brown-and-white horse has a **severe eye injury** and most probably lost the right eye. The whole eye area is a gaping wound and swollen.

Even from the distance, we recognize that **several horses have strongly neglected hooves**. We notice a black horse with severely overgrown hooves with cracks.



Horse lying motionless on the ground



Horse with gaping wound at knee



Serious eye injury



Neglected, overgrown hooves

A group of 30 to 40 horses is in very poor nutritional condition. The majority are thin or emaciated, some are extremely emaciated with prominent spine, hip bones and ribs, indicating severe malnourishment. **Several would not be fit for slaughter because of emaciation¹⁵.** This group has no feed available, while in the other pens we see one or two large hay bales. It is **unacceptable that these malnourished horses have nothing to eat**, while well-fed horses in other pens have plenty of hay available. It is unlikely that the hungry horses will be fed before Monday morning, or before they are slaughtered, as no employees are seen to be present on Sunday. We observe several emaciated horses with **very bad hair coat condition, which could indicate poor nutrition or a number of clinical conditions.** Later, we see an emaciated bay horse lying down. The weakened animal must be at the end of his strength.



Severely emaciated horses that appear exhausted



Emaciated horses (front) have no feed available, while others (behind) have plenty of hay

One pen holds **several foals in addition to adult horses.** At least three of these foals are very young, one of them **still has the umbilical cord.** We observe his mother chasing away another horse that comes too close to her new-born foal. Being **mixed together with adult horses poses a considerable risk for injury** to the young and fragile animals and causes unnecessary stress to mothers and foals. Furthermore, they have no weather

¹⁵ 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 (see Chapter IV page 56)

protection and are **exposed to the blazing sun**. It is highly probable that the foals have been born at the slaughterhouse, but we cannot exclude that they have been brought here together with their mothers. In the EU, it is prohibited to transport highly pregnant mares as well as new-born foals.

Like during our last two visits in 2016 and 2017, the large majority of the horses at General Pico are not marked with ear tags. Today, we see **only two horses with ear tags, despite Argentinian legislation requiring that slaughter horses must be marked with ear tags at the “acopio” (collection centre)** before being transported to the slaughter plant¹⁶. Some horses have the mandatory “F” branding meaning “faena” (slaughter) on their right hindquarters, but most horses do not. At General Pico, the horses have one or several white numbers written on their backs, which is likely the plant’s internal numbering system. Strangely, several horses in the pen of thin and emaciated horses have the same numbers (e.g. 1337 or 1311), while the horses in the other pens all have different numbers.



Mare with new-born foal



Horses without ear tags but with painted numbers

While the small holding pens are full of horses, we only see about 30 horses in the paddock area which is a few hundred meters further away from the buildings. There is some shade from surrounding trees, which is insufficient however, and hay in addition to the little grass growing. The horses have neither ear tags nor white numbers. Many are very thin with ribs clearly visible. **Two horses are lying flat on the floor, completely motionless**, and are either exhausted from transport or possibly injured. We observe a male that keeps chasing a mare, who tries to fend him off by kicking and biting. The horses are mixed together with **donkeys, one of which has a young foal. Another jenny is heavily pregnant**. It can be assumed that the donkeys have been transported together with the taller horses. In the EU, donkeys and foals would have to be transported separately, as the risk of them being trampled is high, especially for the small donkey foal.



Mare kicking her pursuer



Highly pregnant jenny

¹⁶ Resolución 146/2010, Annex VI, Procedimiento de identificación (see Chapter V page 66)



Jenny & foal walking past exhausted or injured horse

When we leave General Pico at 17:30, the parking lot is empty. **From 10:30 to 17:30, no employee was seen walking through the pen area or paddock.** The horses were left unattended during our entire observation period on this Sunday and might be left without supervision over the entire weekend.

Tuesday, 28.11.2017

We return to the slaughterhouse General Pico at 16:30. There is a group of approximately 30 horses in a paddock about 200 meters away from the plant, but it is a different group than two days ago. Again, they are not marked with ear tags and have no white numbers on their backs. The donkeys are nowhere to be seen. Today, there are much less horses in the small holding pens next to the buildings than on Sunday, about 100 to 150. **Again, all roofed pens are empty, and the horses are kept in pens without shelter from the sun.** The group of thin and emaciated horses is not there anymore; they have been slaughtered. The foals are still in the same pen with their mothers and other adult horses. We count at least ten foals. In another pen, we detect a chestnut with a **bleeding head injury**. Head injuries often occur during transport on inappropriate cattle trucks with low trap-doors and crossbars. We also observe a black **gelding who is lame. Both front legs seem to be painful**, he keeps lifting them up and touching both legs and shoulders with his muzzle. Later, the gelding is **lying down, likely because his legs are hurting**.



Gelding holding up painful leg



Same gelding lying flat on the ground

Once again, most of the **horses are not marked with ear tags** but have white numbers painted on their backs, which is not an identification of origin but the plant's internal numbering system. Today we see one group of horses with ear tags as well as several white numbers. **Some horses in this group have the tag in the left ear, some have it in the right ear, and others have no ear tag at all.** According to Argentinian legislation¹⁷, the

¹⁷ Resolución 146/2010, Annex VI, Procedimiento de identificación (see Chapter V page 66)

individual ear tag must be applied to the left ear of the horse, regardless of any other mean of identification the horse may possess, and does not exempt from applying the hot brand “F” on the right hindquarters. We note that **none of the horses in this group have the mandatory “F” branding meaning “faena” (slaughter)**. We observe a group of horses without ear tags and notice that they all have the number 1 painted on their hindquarters (likely the group number) as well as three-digit numbers painted on their backs (likely the individual number), for example 115, 116, 119 and 125 (see photo below). As already mentioned above, according to national legislation such an **internal numbering system of the plant does not mean that no ear tags are required**.



Horses with ear tags and white numbers



Horses without ear tags but several numbers

We leave the slaughterhouse General Pico at 19:30. During our observation period of three hours, no employee was seen checking on the horses’ welfare and condition.

Wednesday, 29.11.2017

Today we drive back south to the province of Buenos Aires in order to investigate about Lamar’s suppliers of horses. As it is raining heavily, we decide to make a last stop at General Pico on the way. When we arrive there at 13:55, we once again observe **horses in pens without weather protection, completely soaked from the heavy rain and standing in a protective posture**, with their hindquarters turned towards the wind and rain. We film the animals for a few minutes, but then employees become suspicious of our car and we have to leave. Shortly after we left, **it starts hailing**. It is unacceptable that the horses are not kept in the roofed holding pens, at least under extreme weather conditions like heat or storm.



Lack of shelter from the heavy rain

3. Collection centre of Angel Ariel Sosa

Address:

Angel Ariel Sosa
 Olavarria
 Provincia de Buenos Aires

GPS location: S 36.81778° W 60.27620°



Collection centre of Sosa

Thursday, 30.11.2017

We visit a collection centre, so-called “acopio”, in Olavarria that supplies Lamar with horses for slaughter. It is located 335 km away from the slaughterhouse, thus meaning short distance transport under eight hours. The establishment of Angel Ariel Sosa is **certified by SGS¹⁸ for animal welfare, on the basis of a manual of the Swiss horsemeat importers’ association VPI¹⁹**. We want to find out if the “acopio” complies with European/Swiss welfare standards.

When we arrive at Sosa’s “acopio” at 16:00, nobody is present. The farm consists of one old building and a few holding pens. It is surrounded by vast pastures. An empty cattle truck, approved by SENASA, is parked on the premises. We see a mobile **ramp, which is quite steep and has a broken wooden slat**, posing a risk of injury. There is no man-made shelter or trees on the pastures or in the pen area. **Lack of weather protection is a violation of European/Swiss welfare standards**. The animal welfare manual of the Swiss horsemeat importers, which is used by SGS as a basis for their audits, clearly states that “a suitable, natural or artificial protection should be available for all horses”.

¹⁸ SGS = Société Générale de Surveillance SA

¹⁹ VPI = Verband der Pferdefleischimporteure



Steep ramp with broken slat – risk of injury

The horses are kept on different pastures. We observe bovines on adjacent pastures and in the small holding pens next to the farmhouse. It looks like Sosa also deals with cattle. Most of the horses on the pastures are well-fed and look in decent condition. Among the adult horses, we see two ponies and three foals. One of the foals is thin with his ribs clearly visible. Furthermore, we observe a grey horse who has a **swollen carpal joint** of the right front leg. Swollen joints can be painful and indicative of several conditions such as arthritis, injuries, infection or broken bones. We notice that **barb wire is used to fence in the horse pastures, what poses a risk for injuries** and would be prohibited in Switzerland. Two groups of horses are standing close together with the barb wire in between. A lot of hair is hanging down from the fence, showing that many horses got in contact with the barb wire. The animal welfare **manual of the Swiss horsemeat importers states: “Use of barbed wire for fencing is generally prohibited!”**



Horse with swollen carpal joint



Fencing made of barb wire – risk of injury

We note that the **horses have no ear tags**, which does not, however, constitute a violation of Argentinian legislation, as horses can legally be marked with ear tags at the “acopio” just before being loaded for slaughter. This is a **very unreliable system of traceability**, which is unsuitable to prove the origin of the horses.

We speak to a **neighbour of Sosa** about the trade with slaughter horses. He tells us that there is another slaughter horse trader in Olavarria, called Barraza, and that he once sold a horse to Barraza which had no papers. He says that **all of them (referring to Sosa and other traders) buy horses without papers**. He explains that he has got several horses but no papers, like most horse owners.

4. Collection centre of Carlos Sagaglia

Address:

Carlos Sagaglia (or Zagaglia)
 Establishment “Lo Sagaya”
 Saladillo
 Provincia de Buenos Aires

GPS location: S 35.64650° W 59.72541°

Saturday, 2.12.2017

Today we visit another collection centre that supplies the Lamar slaughterhouse with horses. The “acopio”, which is also **certified by SGS for animal welfare**, is located in Saladillo and is owned by Carlos Sagaglia. It is only 156 km away from the slaughterhouse, thus meaning short distance transport.

We first talk to a neighbour of Sagaglia in order to confirm that we are at the right place. He explains that the farm is called “Lo Sagaya” and belongs to Carlos Sagaglia, who deals with slaughter horses. Furthermore, he tells us that **Sagaglia transports a lot of horses for slaughter, in general two truckloads per week.**

At 17:40, we drive to the collection centre and briefly speak with Carlos Sagaglia. He is curt and only tells us that he has regular and long-term suppliers of horses.

The farm consists of a small building and a few holding pens. It is surrounded by **pastures, which are fenced in by barb wire**. There are some horses in the holding pens next to the building, but unclear how many. Those we see have **no ear tags**. We do not see any horses on the pastures close to the farmhouse.

On the premises there is a ramp and a trailer, which is a **typical open-roof cattle trailer**. We have observed many times in the past that such trailers are used to transport horses, although they are completely inappropriate.



Horses in holding pens next to farmhouse



Cattle trailer parked on the premises

Sunday, 3.12.2017

On our way to a rodeo, we once more drive by the “acopio” of Carlos Sagaglia. When we arrive there at 9:00, no activities can be observed, and everything is quiet. We do not see any cars parked on the premises. The horses we saw yesterday in the holding pens next to the farmhouse are gone. Filming the “acopio” from another angle, we realize that there is **no man-made shelter in the pen area**, but some large trees. It is questionable though if the trees provide enough shade for all the pens. Also, **individual trees are not able to offer sufficient protection from rain and wind.**



Empty pens at collection centre of Sagaglia

5. Rodeo (“jineteada”) in Azul

Address:

Sociedad Rural de Azul
Ruta 3, Azul
Provincia de Buenos Aires

GPS location: S 36.81286 W 59.86540

Saturday, 2.12.2017

On our way to the horse collection centre in Saladillo, we see a large truck loaded with horses and decide to follow it. The vehicle is a **typical cattle truck** and consists of lorry and trailer. The **open-roofed vehicle** does not offer the horses any protection from sun or rain. We note that the horses are untied and do not wear halters. **The crossbars of the trailer are too low for horses as well as the trap-doors, what can lead to severe head injuries.**

At 11:50, the truck arrives at its destination, a festival site. Talking to people we learn that a **rodeo, so-called “jineteada”, is going to take place tomorrow, Sunday.** Several trucks with horses have already arrived and unloaded the animals into holding pens. Some pens have no shelter, while others offer some natural shelter and shade by trees.



Very low metal bars in the trailer – risk of serious head injuries

After unloading, we leave the rodeo site and decide to come back the next day in order to document the treatment of the horses and to find out what happens to horses that get injured during rodeos or that do not perform well enough.

In 2016, we visited two such “jineteadas” in Uruguay and learned that about 25 % of the rodeo horses are sold to EU-approved slaughterhouses, also if they are unfit for transport. The situation in Argentina can be expected to be very similar.

Sunday, 3.12.2017

When we arrive at the rodeo site in Azul at 12:00, the place is already crowded with people. We learn that the festival is called “**Fiesta del Día Nacional del Gaucho**” and is organized by the “Asociación Criolla Argentina”²⁰. Before the actual “jineteada” starts, different shows with cattle and horses take place.

Background information:

The “jineteada” is a traditional type of rodeo that is practised in Argentina, Uruguay, Paraguay, Chile and in the South of Brazil. The objective is for the rider to stay on an untamed horse for a specified time, 6 to 15 seconds, depending on the category. The event begins when the horse is tied to a tethering post, prepared and backed by the rider. The horse is untied when all four legs are standing firm on the ground, without showing signs of bucking, and the rider is ready to start. During the event, the rider has to stay on the back of the bucking horse without grabbing the animal with his hands. The judges will mark four aspects: the rider, the horse (which has to be bucking), the spurs and the elegance.

The rodeo we visit today comprises two parts: **The first part consists of catching foals with lassos and riding them** without saddle or bridle. **The second part is the typical “jineteada” where young adult horses are forced to jump and buck**, what we have already seen in Uruguay.

At 16:00, the first part of the rodeo starts. A large herd of mares and foals of different ages is moved onto the show ground and made run around. We then observe a male **foal, about 12 to 18 months old**, being caught by lasso and separated from the herd. The first lasso catches the foal around the neck and makes him fall down in full gallop. He stands up immediately and continues running. Other gauchos on foot subsequently **try to catch the foal’s legs with their lassos. They make him fall down several times**, but the young horse is able to free himself each time and keeps running in complete panic. When a lasso catches both hind legs, **his muzzle hits the ground very hard as he tumbles over**. The foal gets back up again and stands still, **totally confused and exhausted**. He then tries to re-join the herd but is pulled away by the rope around his neck, and gauchos force him to run. Later, he **falls down hard as both front legs are caught by a lasso**. The spectators shout out and clap their hands. Two gauchos jump onto the foal and fix him down to the ground, one sitting on his head, the other on his flank. Other gauchos cut the mane and tail and **hot-brand the young animal, a very painful procedure**. The foal is breathing heavily, his nostrils are dilated, and **blood is visible on his lips**. He fell five times in total, and several times on his head. After the mane and tale have been cut, a corpulent gaucho sits onto the foal and grabs him by some strands of hair left in the mane. The animal is then released and **stands up with the corpulent gaucho on his back, who keeps hitting him with a leather whip**. The gaucho only stays on the foal’s back for a few seconds. Before dismissing the exhausted animal, another gaucho on horseback keeps whipping him for no apparent reason.

²⁰ <http://www.asociacioncriolla.org.ar/>



Gauchos making the foal fall down



Foal hitting the ground with his muzzle



Gauchos cutting the foal's tail hair



Corpulent gaucho riding the foal

Other foals have to endure the same painful and stressful procedure. We observe a female foal being hot-branded and having her mane and tale cut. Thereafter, she is ridden by the same corpulent gaucho, **hitting her hard with his leather whip**. He stays on her back for six seconds and is then taken off by another gaucho on horseback.



Foal being hot-branded



Corpulent gaucho riding and hitting the foal

Later, we observe a pinto mare with a very young foal who has also been caught by lasso and separated from the herd. **A lasso has cut a deep wound into her left hind leg** and is stuck in the wound. After the lasso has been removed, the mare and her foal are released and re-join the herd. The **bleeding open wound remains untreated**, at least for the moment.



Gaping wound caused by lasso



Gaucha removing lasso from frightened mare

After the first part of the rodeo, the **horses – among them highly pregnant mares and very young foals – are chased around** on the show ground by several gauchos on horseback. The animals are frightened, many are in complete panic. We observe a white mare falling down after bumping into other horses. She is clearly limping afterwards.



Mares and foals being chased around on the show ground

At 17:20, we walk through the pen area and note that some groups of horses have large hay bales available, while others have nothing to eat. We talk to a horse owner called Adrian whose horses participate in the festival activities. He says **if horses are not useful for “jineteadas”, they are sent to the slaughterhouse**. We ask if horses are also sent for slaughter if they have a broken leg. Adrian says yes but explains that this is complicated for the organiser of the festival, because the local animal protection societies do not want the animals to suffer. Therefore, they **load the injured animal onto a truck and pretend to take it to the medical service**. Adrian further states that in Mercedes there is a slaughterhouse for horses (Lamar). We ask him if horses go there in case they have a broken leg, and Adrian confirms. He also affirms that **it has happened in the past that animals broke a leg here and went there for slaughter**.

At 18:00, the second part of the rodeo starts, the typical “jineteada”. Young adult horses are **tied to a wooden post and blindfolded**. They are saddled, and a leather sling is put into their mouth and fixed around the lower jaw. The animals are **very frightened, some panic**. A mare is observed struggling at the post after a gaucho tried to put the leather sling in her mouth. **Several horses fall down while tied to the post** and trying to free themselves. When the “jineteada” starts, the blindfold is taken off and the horses are untied. At the same moment, the **riders kick them with their spurs** and other gauchos positioned behind the horses **hit them forcefully with a leather whip to make them buck**. If the riders manage to stay in the saddle for 12 seconds, a bell rings and they are taken off by two other gauchos on horseback. Some riders fall off immediately, most stay in the saddle for a few seconds. One horse **falls down onto his knees when bucking**. Later, we observe a gaucho **kicking a horse hard in the face that is lying down by the post**. The horse still does not stand up, until

another gaucho on horseback takes the rope and leads him away. The horse seems to be limping, is possibly injured.



Spurs and leather whip used to make the horses buck



Horses must be bucking for 12 seconds



Horse falling hard onto his knees



Blindfolded horses struggling at the post

At 19:50, we see the truck leaving which we followed to the rodeo site the day before. We leave shortly afterwards, as it is getting dark and filming becomes impossible.

III. Observations in Uruguay

1. Slaughterhouse Clay

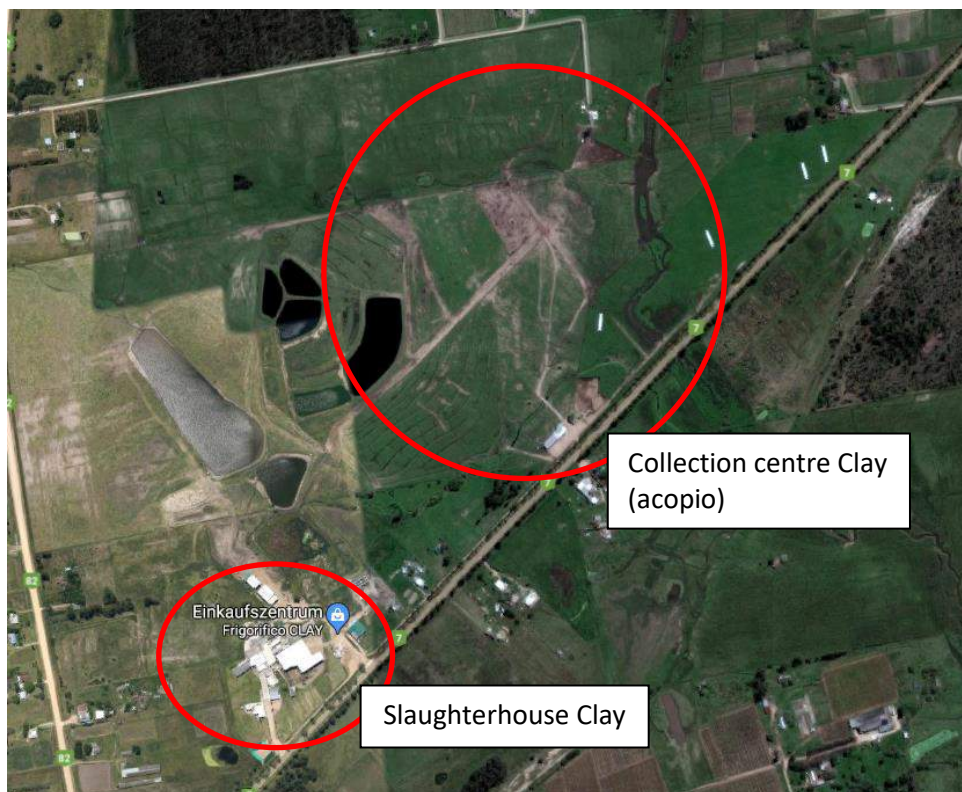
Address:

Frigorífico Clay S.A.
 Ruta 7 km 40
 Totoral del Sauce
 Departamento Canelones

EU approval number: 303

Important note:

The company Clay S.A. owns a slaughter plant but also a registered “acopio” (collection centre). In Uruguay, horses have to receive ear tags for individual identification before the transport to the “acopio”²¹. The ear tag number has to be noted on the sworn statement of the last owner attesting that during the last 180 days the horses have not been given any prohibited medication. Horses always have to go first to an approved “acopio” – already marked with ear tags – and from there to the slaughterhouse.



Aerial view of Clay's slaughter plant and “acopio”

²¹ Resolución Nº 185/017 (replaced by Resolución Nº 435/017 in December 2017)



New building at Clay slaughterhouse

Sunday, 5.11.2017

When we arrive at Clay at 12:20, we note that the new building of the slaughter plant that was in construction last year looks now finished. According to our information, it is used for cattle and not for horses.

We observe about **100 horses on the paddocks of Clay's "acopio"** (collection centre). Some paddocks are green, as October was a rainy month, while others are dusty and without a blade of grass. We are surprised to see that **most of the horses are not marked with the mandatory ear tags, which they should receive before arriving at the "acopio"**, according to Uruguayan law²². It is highly questionable if they have the required documentation like the sworn statement of the last owner about veterinary treatments, which would have to include the ear tag number. During our last visit in December 2016, most but not all horses were marked with ear tags.

Furthermore, we notice that the **weather protection is still insufficient**. One of the broken shelters has been fixed since our last visit, another still has no roof. There are **just two intact shelters in the whole "acopio"**. The large majority of paddocks still offer no protection at all from adverse weather conditions. At the slaughterhouse, there is a group of **horses in a holding pen next to the buildings, which is unroofed**. The animals appear to be crowded. As today is Sunday, it must be expected that they stay in this small, uncovered pen over the weekend and will be slaughtered on Monday at the earliest.



Broken shelter without roof at "acopio"



Horses in unroofed pen at slaughter plant

We note that there is also a **new building at the "acopio"**, which makes it impossible to see the loading or unloading of horses, because the ramp is inside the building. We wonder if it has been especially built as sight protection, as the ramp is located next to the main road.

²² See Chapter VI: Non-compliance with Uruguayan legislation regarding traceability

On a green paddock of Clay’s “acopio”, we observe a group of approximately **30 horses that all have no ear tags**. It can be excluded that they are riding horses of the employees, as many are in poor condition: very thin, emaciated or injured. We spot a grey horse that has a **major head injury**, which likely occurred during transport on an inappropriate cattle truck. A thin chestnut gelding has a **severe open wound on the left hind leg, exposing the bone**. The extensive wound is located on the lower leg, which is heavily swollen. This gelding would not have been fit for transport. Moreover, he **should have been cared for by a veterinarian or emergency killed** immediately after arrival at Clay. Instead of being released from further suffering, he is **left unattended at the “acopio”, without wound care** and most likely without pain therapy. Anti-inflammatory painkillers like phenylbutazone or dipyrone cannot be administered for food safety reasons.

In March 2015, we spoke to Dr Guillermo Caruso, Clay’s veterinarian responsible for animal welfare. He said if horses are injured when they arrive, they are slaughtered with priority, and if they are severely injured, they are emergency killed immediately. The reality looks different. Already back then, we found several seriously injured horses on Clay’s premises.



Chestnut with severe leg injury, without ear tag



Horse with head injury, without ear tag

In a dirt paddock further away, we observe a group of horses which are marked with ear tags. These horses do not have any feed available. They are **searching for food and scratching the dusty ground**, showing that they are hungry. None of them is seen eating from the round feed troughs, so it must be assumed that they are empty. In an adjacent green paddock, a very young foal is observed lying on the floor. A horse is grazing at some distance and might be his mother. The paddock offers **no weather protection for the young animal**. We wonder if the foal has been born at the “acopio”, which is very likely as we have repeatedly seen pregnant mares here in the past.



Very young foal at “acopio”



Hungry horse scratching the dusty ground

Tuesday, 5.12.2017

We return to the slaughterhouse Clay one month later. When we arrive at 17:00, we observe about 50 to 60 horses on the paddocks of the “acopio”. A lot of horses are in very poor condition. Some are very thin to the extent that they would be **unfit for slaughter because of emaciation**²³. We are appalled to see that the **chestnut gelding with the serious leg injury that we saw one month ago** is still there in the same paddock. The open wound on the lower leg has even become bigger, indicating an infection. The **whole hind leg is heavily swollen**. The gelding, who was already thin in November, is **now severely emaciated**. It is completely unacceptable to **let this animal suffer for at least one month instead of euthanising him upon arrival**. In the same group, we spot the grey horse with head injury we also first saw on 5th November.

In another paddock, we detect a thin bay horse who is lame in the right hind leg and can only bear minimal weight on that leg. We are surprised that this horse has an ear tag while all the others in the same group do not. Further away, we observe an emaciated dark bay mare who is **severely injured at the fetlock** of the right hind leg. The fetlock is possibly broken, and the **lower leg is heavily swollen** up to the hock, which is a sign of inflammation. The suffering animal is not able to bear any weight on that leg and is **limping on three legs**. When standing still, the mare **keeps lifting up the injured leg, indicating strong pain**. In addition, she is extremely emaciated with prominent spine and hip bones. The mare should be considered unfit for slaughter because of emaciation, and germs have possibly already spread throughout the whole body via the bloodstream. Like the chestnut gelding, this mare **should have been emergency killed immediately**. Later, we observe how she **lies down and starts licking her wound**, what again is an indication for severe pain.



Chestnut with bad leg injury, first seen on 5th Nov.



Seriously injured mare standing on three legs

Today we **only see three horses with ear tags**. Several mares are **clearly pregnant, and we count five foals**, three of them still very young. In the EU, it would be prohibited to transport highly pregnant mares as well as new-born foals. We note that several paddocks are holding cattle or sheep, some mixed together with horses. The **broken shelters still have not been repaired for years and only one paddock holding horses has a shelter** made of wooden posts with some black fabric as roof, which is tattered. There are only few animals in this enclosure; most of the horses at Clay’s “acopio” still have no weather protection. Another paddock holding sheep has a shelter with a white fabric roof, which is still intact but does not look robust.

The paddocks are not as green as during our last visit on 5th November and most of them are **grazed bare**. However, we **do not see any additional hay**, and a lot of horses are observed nibbling at the sparse grass. The ground is covered in manure and we doubt that the paddocks are ever cleaned out.

²³ 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 (see Chapter IV page 56)

Next to the main road, between the “acopio” and the slaughter plant, we observe a herd of approximately **30 donkeys**. In contrast to the horses, they are **all marked with ear tags** and have some shade from trees. Most of them are lying down and resting in the shade.



Young foal, his thin mother & pregnant mare



Shelter with tattered fabric roof



One of three horses with ear tag & young foal



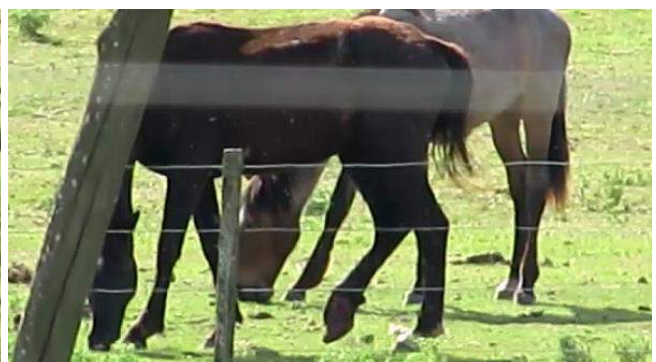
Donkeys marked with ear tags

Wednesday, 6.12.2017

When we arrive at Clay slaughterhouse at 14:20, we observe a group of horses in a holding pen next to the buildings, which is unroofed. The sun is beating down and temperatures reach 28°C today.

At Clay’s “acopio”, we realize that the **two horses with severe leg injuries are still at the same place**. The injured dark bay mare is grazing closer to the road today and an open wound becomes visible on the inner side of the fetlock. The **serious flesh-wound looks untreated**. The mare constantly holds the injured leg up in the air, indicating severe pain. The horses’ **health condition is obviously not checked on a daily basis**. Injured animals should be isolated from the others, cared for, or euthanized if necessary.

The lame bay horse with ear tag that we have also seen the day before is observed limping past the dilapidated shelter with tattered fabric roof. We notice that the horse has a wound at the bulb of the right hind leg.



Two seriously injured horses already seen the day before, still not released from suffering

Thursday, 7.12.2017

When we return to Clay at 12:00, we realize that only few horses are left at the “acopio” and most paddocks are empty. The two groups with seriously injured horses are gone as well as the three mares with young foals. We wonder if they have all been slaughtered, regardless of their condition or young age, and if not, what has happened to them. **The few horses we see at Clay’s “acopio” today have no ear tags.** The large group of ear-tagged donkeys is still there.



Only two shelters at Clay’s “acopio” – most paddocks offer no weather protection

At 12:20, we film a **truck loaded with horses arriving at Clay’s “acopio”** and backing up to the unloading ramp, which is hidden inside the new building. It is a typical Uruguayan livestock transporter that has no roof and thus offers **no protection from sun and rain**. The vehicle consists of a lorry and trailer and has a capacity for about 40 horses. The lorry has only one and the trailer has two compartments, thus the horses are transported in three groups. The vehicle has four trap-doors: one at the exit, one as a divider inside the trailer and two between lorry and trailer. **The trap-doors are much too low for horses, since Uruguayan livestock trucks are designed for cattle**, posing a considerable risk for head injuries. The crossbars of the trailer are also too low. We note that the **horses have no ear tags, which is a violation of Uruguayan law that requires horses to be ear-tagged before transportation to the “acopio”**.



Truck arriving at Clay’s “acopio” with untagged horses



Truck backing up to the unloading ramp of “acopio”

Ten minutes later, two employees arrive on horseback to help with the unloading and greet the driver. One employee and the driver move the horses out of the truck using long sticks with blue flags attached, while the second employee disappears inside the new building. As we later find out, his job is to mark the horses with ear tags. We observe the other employee **poking the horses forcefully with the flag stick** to make them exit the truck. The animals are **very agitated and lift their heads higher than the crossbars**, risking severe head injuries. The driver is observed hitting horses on their heads with the blue flag. A horse standing by the exit door is forcefully hit on the head three times in a row. At one point, the driver **flips his flag over and repeatedly hits the horses fiercely with the long stick, including their heads**. The animals are frightened, some even panic. When the trailer is empty, it is not unhitched to unload the lorry, what increases the **risk for injuries as the horses have to pass all four trap-doors and the gap between lorry and trailer**. From our position, we cannot see the gap because of a large tree blocking our view. The exit door and the ramp are also not visible as they are inside the new building, which likely serves as visual protection. It is thus not possible for us to see how many horses hit their heads against the trap-doors. The animals in the lorry panic when the driver approaches with the flag, **one horse even rears up**. The last horse in the lorry, standing in a corner, is **repeatedly hit on the head with the flag**.

The unloaded horses are moved into a small pen next to the new building. We note that they are **now marked with yellow ear tags**, so they must have received them inside the building.



Clay’s employee poking horses with the flag stick



Driver hitting horses on their heads with flag



Driver repeatedly hitting horses with the flag stick



Unloaded horses now marked with yellow ear tags



Horses unloaded into small pen next to new building

At 13:00, the truck is completely unloaded. Five minutes later, the same horses are reloaded, now wearing ear tags. At 13:10, the truck leaves Clay's "acopio", fully loaded again. It drives from the "acopio" over to the slaughterhouse, which is only 450 meters away. The truck **backs up to the unloading ramp of the slaughter plant at 13:20.** The horses stay inside the truck parked at the unloading ramp for **more than 55 minutes, without any shade.** We have to change our position and when we return 15 minutes later, the horses have been unloaded and the empty truck drives to Clay's washing station. We observe another truck leaving with slaughterhouse waste, indicating that slaughter takes place today.



The same horses are reloaded onto the truck



They are now marked with ear tags



*Truck leaving “acopio” with the same horses – now tagged for slaughter
Crossbars of the trailer are too low for horses*



Truck driving over to Clay’s slaughterhouse



Truck backing up to the unloading ramp



Loaded truck parked in full sun over 55 min



Truck driving to washing station / low trap-doors

According to Uruguayan requirements, horses destined for slaughter are required to be **marked with ear tags before being transported to an approved collection centre, so-called “acopio”**²⁴. For many years, we have been pointing out that the **Uruguayan system of traceability is unreliable and therefore opens the door to fraud**. At Clay, we have observed on several occasions that horses without ear tags were unloaded at the slaughterhouse or the “acopio”. Today we have filmed horses being **marked with ear tags at the “acopio”, reloaded immediately and transported over to the slaughter plant**. In addition to serious concerns regarding traceability, this procedure is also objectionable from an animal welfare point of view, because each unloading and reloading poses risks for injuries, especially on an inappropriate cattle truck with low trap-doors.

²⁴ See Chapter VI: Non-compliance with Uruguayan legislation regarding traceability

The problems with traceability in Uruguay are even aggravated by the fact that a large number of horses with unknown origin are **smuggled over the green border between Brazil und Uruguay** and sold to EU-approved slaughterhouses, including Clay, as a police investigation revealed in 2015 (see newspaper articles in Annex 4 and 5).

Our observations today show that cheating still takes place and traceability cannot be guaranteed. **Clay is part of a system in which fraud is widespread and common.**

Friday, 8.12.2017

After spending the whole day observing the Sarel slaughterhouse, we pay a quick visit to Clay at 17:40. There are several new groups of horses at Clay's "acopio" in paddocks which were empty the day before. They have been **placed in dirt paddocks without shelter, although the green ones with shelter are empty**, but these are close to the main road and people driving by could possibly see horses in bad condition (see aerial view on page 35). This might be the reason why the horses are kept further away from the road. We note that they have **no hay available**.

Surprisingly, **most of the horses we see today wear ear tags, albeit not all**. We estimate that there are more than 100 horses at the "acopio". The donkeys are still there as well.



"New" horses in dusty paddocks without shelter

2. Slaughterhouse Sarel

Address:

Frigorífico Sarel S.A.
 Ruta 7 km 28.600
 Sauce
 Departamento Canelones

EU approval number: 6

Tuesday, 24.10.2017

When we arrive at Sarel slaughterhouse at 16:30, we observe approximately 100 horses in the large paddocks close to the main road. There are still **only two small shelters** with corrugated iron roof, like during our last visit in December 2016. Six horses are standing under one of the shelters and already look crowded. Moreover, it is very likely that dominant animals chase away submissive ones. Although the constructions are **completely insufficient in size and number**, no new shelters have been built in the meantime. **Two of four paddocks still offer no weather protection**, but those are empty today.

At Sarel, there are four different areas where horses are kept before slaughter:

1. Large paddocks with little grass growing and **two small shelters** (not yet visible on Google maps)
2. Small holding pens with dirt ground and **no shelter**
3. Lairage area covered by a black fabric roof
4. Pasture **without weather protection**



Different areas where horses are kept before slaughter



Insufficient weather protection (two small shelters)

The ground is **heavily polluted with excrements** and we wonder if the paddocks are ever cleaned out. We note that there is **no additional feed to the sparse grass** that is growing in the paddocks. A lot of horses are **searching the floor for food, apparently hungry**. None of them is seen eating from the round feed troughs, so it must be assumed that they are empty. Some are eating food remains next to these troughs. Several horses are lined up at the fence and eat grass outside the paddock, putting their heads through the fence. Others are nibbling at the grass that grows in some parts of the paddocks but is scarce.



Hungry horses searching for food (trough must be empty)

We notice that a lot of horses are very thin, their ribs or hip bones clearly showing. At least one horse is emaciated. A chestnut mare has a **large wound on the right hind leg**, which looks like an older injury, but her lower leg is still swollen. Another chestnut has a **fresh, bleeding injury** on his right hind leg, which might have occurred during transport. A skin flap is hanging down loosely. A white-and-grey stallion who is very thin has an **open wound at the hock** of the left hind leg, which is swollen. **Stallions should not be mixed with mares** but be kept separately. One horse is lying flat on the ground without moving the whole time during our observation. We cannot tell if the horse is just exhausted or injured. We detect a **mare that appears to be pregnant**.



Horse with bleeding leg injury



Mare with large wound & swollen leg



Shelter insufficient for all horses in the paddock



Horse lying motionless on dirty floor

Although the horses in the paddocks are not crowded today, **biting can be observed repeatedly**. It is always a stressful situation for horses to enter a new group, where a new hierarchy has to be established. Like during our last visit in December, the horses are marked with the mandatory ear tags and additionally have two small paper tags attached to their hindquarters and backs, which is likely an internal identification system of Sarel.

Wednesday, 25.10.2017

When we return to the slaughterhouse Sarel at 15:20, it is raining. The horses are on a green paddock today which has sufficient grass, the one next to the main road, but this **paddock offers no shelter from the rain**. Several horses are very thin, a chestnut is emaciated with prominent ribs and hip bones. We note that some **horses still have the paper tag of an auction attached to their hindquarters**, where they have been purchased by horse traders. Like Clay, Sarel is not only a slaughterhouse but also a registered “acopio” (collection centre).



Emaciated chestnut standing in the rain



Horse with auction tag still attached

Tuesday, 5.12.2017

We return to the Sarel slaughterhouse six weeks later. When we arrive in the evening at 19:30, we see more than 150 horses in a large paddock close to the main road. One paddock with shelter is empty today, while the other looks **very crowded**. The single shelter offers insufficient weather protection for all the horses, as only six to ten horses fit underneath.

Very little grass is growing in the paddocks compared to our last visit in October, which was a rainy month. We do **not see any additional hay being fed**, and horses are searching the ground for food. We note that the majority of the horses are thin with their ribs clearly visible. **Several are emaciated with prominent pelvis and backbone**. We observe a palomino **lying flat on the ground without moving**, who is likely exhausted from transport. A severely emaciated bay gelding is standing nearby. He should be considered **unfit for slaughter because of emaciation**²⁵. When the palomino later stands up, it becomes evident that he is extremely emaciated as well.

At first glance, it looks like all horses are marked with ear tags, but later we see a **horse without ear tag** that is clearly destined for slaughter as shown by two small paper tags attached to its back.



Emaciated bay horse & palomino lying down



Thin horse searching for food

Wednesday, 6.12.2017

When we arrive at Sarel at 13:00, the large paddocks in front of the slaughterhouse are empty, which were full of horses yesterday evening. We observe a large number of horses, possibly more than 300, in small holding pens at the back of the plant. We note that they have **neither shade nor feed available**. The temperature is climbing up to **28°C** today. The horses are standing in the blazing sun and on dusty ground without a blade of grass or hay. The pens are **extremely crowded, what creates stress and leads to ranking fights**. The animals are very agitated, and biting is observed frequently.

At 13:15, several employees enter the pens and move groups of horses over to the roofed lairage area next to the buildings. They use long sticks with white flags attached. Unfortunately, we are too far away to assess the handling of the horses or their condition. However, we can tell that they are **nervous and stressed because of the presence of employees. Some even panic and rear up**.

On an adjacent pasture, there are **four mares with very young foals**. The mares belong to Sarel as shown by their ear tags and small paper tags on their backs. Two of them are very thin with ribs and hip bones clearly visible. No matter whether the highly pregnant mares or the new-born foals have been transported to the slaughterhouse – in the EU both would be prohibited.

²⁵ 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 (see Chapter IV page 56)



Horses standing in full sun (28°C)



Horses fighting in overcrowded pen



Mares, foals & horses in roofed lairage



Emaciated mare with young foal

At 14:10, we drive to the slaughterhouse Clay, which is only a few kilometres away. When we return to Sarel at 15:15, there are much less horses in the small holding pens at the back, around 50. It looks like most horses have been slaughtered in the meantime. The roofed lairage area is now empty. We later learn from a neighbour that Wednesday is indeed a day of slaughter. The horses that are left in the holding pens are less crowded now and much calmer. No more fighting can be observed.

At 16:26, several employees are seen leaving the plant. Slaughter is probably finished for today. When we leave Sarel at 17:20, the group of about 50 horses is still in the pen at the back of the plant. It looks like they are not slaughtered today.

Thursday, 7.12.2017

When we arrive at Sarel slaughterhouse at 10:15, we notice that the holding pens at the back of the plant are empty, as well as the roofed lairage. We observe a group of about 30 horses in a front paddock, among them a chestnut with a **bleeding cut above the right eye**. Approximately 30 horses are grazing on a pasture behind the buildings, at the far end of the premises. This pasture offers the animals enough grass to eat, however **no weather protection**.

At 10:35, a truck loaded with horses arrives at the plant. It is a small lorry without trailer, transporting the animals in **just one compartment**. They appear to be crowded. The **open-roof vehicle** does not offer them any protection from sun or rain. We notice that the **crossbars are very low and the horses risk hitting and injuring their heads**.

Unloading starts shortly after arrival. The driver climbs up the side of the truck and uses a stick with a white flag attached to move the horses out of the truck. Moving horses from above causes additional stress. The driver repeatedly **hits them with the flag, also on their heads**. The vehicle is a cattle truck and not designed for the transport of horses. We observe a **horse banging his head hard against the low trap-door at the exit**,

what can lead to the typical head injuries that we have seen so many times. Three other horses also touch the trap-door or hit their heads when walking out of the truck. Within just two minutes, all 15 horses are unloaded. The truck is then cleaned by the driver in Sarel's washing station.



Horse lifting head higher than crossbars



Horse hitting head against low trap-door

The unloaded horses are moved over to the holding pens at the back of the plant. We observe a white horse with a **bleeding injury on the right front leg**, which likely results from transportation. Like yesterday, there is no hay available in these pens. Several horses are observed **searching the dirty ground for food**.



Horse with bleeding leg injury



Hungry horses searching for food

We speak to a **person who lives next to the slaughter plant**. He tells us that slaughter takes place on Wednesday and Friday. Last Saturday, horses were slaughtered too but the electricity went off and Sarel had to get rid of the bodies because they could not process the meat. They dug two holes with a machine, which are now covered. **One hole with dead horses is near his house** and the other one further away from the plant.

At noon, we drive to the nearby slaughterhouse Clay. When we return to Sarel at 15:20, the pens at the back are quite crowded. One or more trucks must have been unloaded in the meantime. Again, we notice that there is **no feed available**. At 15:45, we leave Sarel and wait for trucks further north on the main road, but do not see any.

We return to Sarel at 18:30. The pens at the back of the plant are now empty, except for three mares with young foals already seen the day before. The other **horses have been moved into the roofed lairage area which is very crowded, likely in preparation of slaughter tomorrow (Friday is slaughter day)**. Some biting can be observed. Even though we can only see the upper part of the horses' bodies, we can still tell that they are not eating. It can be assumed that they **will stay here for a further 12 hours, or more, without any food and in crowded conditions leading to stress**. The horses that were unloaded this morning likely have to endure **around 24 hours of food deprivation** before being slaughtered.



Crowded pens in roofed lairage area

Friday, 8.12.2017

When we arrive at Sarel slaughterhouse at 10:40, the roofed lairage area is empty. The horses have probably been slaughtered in the early morning. There is an empty truck parked at the unloading ramp. We see a group of about 30 horses in the unroofed holding pens at the back of the plant. They might have just been unloaded. Like on the previous days, there is **no food available and the horses are standing in full sun**, with temperatures reaching **27°C** today.

At 11:10, the group of 30 horses is moved out of the pen and out of our sight. We observe that an **injured white horse is separated from the group and left behind alone in a smaller pen**. The horse is lame and has a bleeding injury at the hind leg. A dun horse in the same group is also lame and has a **large open wound at the hind leg but is not isolated from the group**. The isolated white horse is later seen searching the pen floor for food and must be hungry.



Injured horse being separated from the others



Isolated horse with leg injury

At 11:15, several groups of horses are moved into the holding pens at the back of the plant. Within 12 minutes only, the **whole pen area is severely overcrowded**. The horses are stressed and agitated as employees move them around. **Biting and kicking are observed frequently**. Again, we note that no feed is given to the horses. Later, we see a white **horse lying down in the crowded pen**, what is not a normal behaviour because the horse risks being trampled. We suspect that the animal is injured or very exhausted from transport. A grey horse is observed **repeatedly licking his bleeding wound** at the fetlock of the right hind leg, **indicating strong pain**. Another white horse is severely lame. We see a horse flehming, then **repeatedly trying to mount**. Later, another horse is observed mounting. If these horses are stallions, it is unacceptable that **stallions are mixed together with mares**. If they are geldings or mares, mounting is clearly a sign of high stress, e.g. resulting from overcrowded conditions.



Overcrowded pens without shelter from the sun



Horses biting and kicking



Exhausted or injured horse lying down



Horse trying to mount

At 12:00, a **dilapidated truck arrives at the plant loaded with horses**. The open-roof vehicle is rusty and looks very old. It consists of a lorry and trailer and has capacity for about 40 horses. The animals appear to be very crowded. The truck drives to the ramp and starts unloading immediately. Unfortunately, we cannot see if horses hit their heads against the trap-door at the exit because the roof of the lairage is blocking our view. When the trailer is empty, it is unhitched to unload the lorry.

At 12:40, the horses that have just been unloaded are moved into the roofed lairage. They now have two white paper tags on their backs, which are not auction tags but an internal numbering system of Sarel. We observe that **only 3 - 4 horses have space to drink at the water trough. They stay there and block the access for the other horses, who remain thirsty**. There seems to be no feed available in the roofed pens neither, as none of the animals is seen eating. We detect a white horse with a **bleeding injury on the hip, likely sustained during transport**.



Horses transported in rusty truck without roof



Only a few horses reach the water trough

At 13:00, another truck arrives at the plant and unloads horses. Again, the roof of the lairage is blocking our view to see if horses hit their heads against the trap-door at the exit. We observe that the last horses stay on the ramp for several minutes, refusing to walk down. At 13:40, the unloaded horses are moved into a pen in the roofed lairage. A white horse has a **severe eye injury, and blood is running down his face**. The injury looks fresh and likely occurred during transportation. An employee dressed in a blue overall looks at the injured horse but takes no action. He continues with his work instead of getting veterinary assistance.



Employee watching horse with eye injury but taking no action

The roofed lairage area is now quite crowded and horses are repeatedly seen biting each other. On a pasture next to the buildings, we observe a white horse that has a **gaping wound on the left front leg**. In the afternoon, there are **two more horses in the "isolation pen"** in addition to the injured white horse: a chestnut who appears to be lame and a second white horse who looks pregnant. If these horses have been isolated because of their impaired condition, **we wonder why all the other injured horses have not been separated**. Furthermore, isolating injured horses is not a sufficient measure, they also would have to be treated or if necessary emergency killed. However, **no medical care is given to any of the horses during our observation today** (from 10:40 until 17:15).



Horse with gaping wound



Two more horses isolated from the others

When we leave Sarel at 17:15, there are 300 or even more horses in the waiting pens. They have **not received any food the entire day** and it is questionable if they will be fed before slaughter. Driving by Sarel at 18:00, we see that the horses are still in the overcrowded pens and will likely stay there overnight.



Horses still in overcrowded pens in the evening

IV. 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 category²⁶. 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 requirements²⁷.

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. **Uruguay still has no legislation for animal welfare during transport, and Argentina's legislation is far below EU standard** and does 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 poor transport conditions in both Argentina and Uruguay. The most recent **EU audit about horsemeat production in Argentina, held in September 2014**,²⁸ 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 investigations from October to December 2017.

²⁶ https://ec.europa.eu/food/safety/international_affairs/trade/non-eu-countries_en

²⁷ https://ec.europa.eu/food/sites/food/files/safety/docs/ia_trade_import-cond-meat_en.pdf

²⁸ EU audit report 2014 on Argentina: 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 consumption²⁹

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 60.

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 and Uruguay's regulations for the protection of animals at slaughter (Resolución 46/2014 and Resolución DGSG/No 152/012) are by far not equivalent to those of Council Regulation (EC) 1099/2009 (see comparative tables in Annex 2 and 3). Apparently, the Commission approves export of meat to the EU from third countries whose requirements for animal welfare at slaughter are far below those of the EU, although Article 12 of Regulation (EC) 1099/2009 requires them to be equivalent (see subchapter 3 on page 62).

Note regarding (k): The report of an EU audit carried out in Argentina in 2012 found the supervision of the competent authority SENASA³⁰ to be unsatisfactory, and the repeated recommendations of three previous EU audit reports had not been properly addressed³¹. The report of the most recent EU audit in Argentina 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 treatments³². As regards Uruguay, an audit carried out in 2016 noted weaknesses "concerning the controls aimed at ensuring that the requirements for residency at the holdings, on administration of veterinary treatments of the animals and on animal welfare at the time of killing, are met"³³.

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:

²⁹ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2004:226:0083:0127:EN:PDF>

³⁰ Argentinian Veterinary Authority (Servicio Nacional de Sanidad y Calidad Agroalimentaria)

³¹ EU audit report 2012 on Argentina: http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_id=3043

³² EU audit report 2014 on Argentina: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3375

³³ EU audit report 2016 on Uruguay: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3793

- (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;
- (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.”³⁴ The 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.”³⁵ The EU audit report on Uruguay from 2016 made exactly the same recommendation after coming to the conclusion that “as regards horses, the official controls in place do not provide guarantees that the EU listed establishments meet the requirements of Article 12 of Regulation (EC) No 854/2004”.³⁶ Our observations made in Argentina and Uruguay between 2012 and December 2017 confirm that horse slaughter plants on the list of approved establishments do not fulfil relevant EU requirements.

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**

³⁴ EU audit report 2012 on Argentina: http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_id=3043

³⁵ EU audit report 2014 on Argentina: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3375

³⁶ EU audit report 2016 on Uruguay: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3793

(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 in Argentina and Uruguay 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 and if necessary emergency killed.

The report of the most recent EU audit held in Argentina 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-mortem³⁷.

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, as in the case of Argentina (see comparative table in Annex 1), or even inexistent, as in the case of Uruguay. The official veterinarians' checks on animal welfare at slaughter are clearly insufficient 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 investigations in late 2017 (see subchapter 3 on page 62).

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 marked with ear tags at the collection centre ("acopio"), before being shipped to slaughter (see Chapter V). In Uruguay, they have to receive ear tags even before transportation to the "acopio" (see Chapter VI). Slaughter plants may only purchase properly identified horses. In 2017, we yet again saw horses without ear tags at all slaughter plants visited, and horses of unknown origin obviously enter the slaughter process. At General Pico, the large majority of horses were not ear-tagged. At Lamar, we observed a group of 23 horses receiving ear tags on the slaughterhouse premises in June 2017 (see report "Production of horsemeat in Argentina, June 2017"). At Clay, we documented that a group of horses was unloaded at Clay's own "acopio", marked with ear tags, reloaded immediately and transported over to the slaughter plant (450 m). In addition, most horses observed at Clay's "acopio" had no ear tags, although they should receive them before. At Sarel, single horses were not ear-tagged.

³⁷ EU audit report 2014 on Argentina: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3375

Note regarding paragraph 4: At all slaughterhouses visited in Argentina and Uruguay, we found extremely emaciated horses in the waiting pens, with prominent backbone, pelvis and clearly visible ribs (BCS 1³⁸). Such horses are unfit for slaughter because of cachexia. In addition, we observed seriously injured horses which showed signs of a systemic condition (a severe chronic inflammation) and germs had possibly already spread throughout the whole body via the bloodstream.

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.**

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 again during our latest investigations in Argentina and Uruguay (see subchapter 3 on page 62). The supervision of the Argentinian competent authority SENASA still appears to be unsatisfactory, as already stated by the FVO in 2012³⁹. 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. In Uruguay, an EU audit carried out in 2016 noted grave violations against Regulation (EC) 1099/2009. However, “these deficiencies have not been detected by the official veterinarian in charge of the official controls in the slaughterhouse, not by his supervisor. The audit team noted that, out of ten stunned horses observed, one animal received three shots and in another case the time between stunning and bleeding exceeded the six minutes.”⁴⁰

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, toxaemia 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.**

Note regarding (f) and (u): Both in Argentina and Uruguay, we repeatedly observed seriously injured horses with infected wounds and heavily swollen legs, which are signs of a generalised disease. At Clay, an injured chestnut stayed at the “acopio” for more than one month. Because the chestnut had an older wound and chronic inflammation, it can be assumed that germs were present in the bloodstream and thus in the whole body. Depending on the type of microorganisms, he had a septicaemia (blood poisoning), pyaemia (pyogenic microorganisms in the blood), toxaemia (bacterial toxins in the blood) or viraemia (viruses in the bloodstream). As he might have had a condition that could be transmitted to humans through eating meat, he should not have been accepted for slaughter. At Lamar, a black mare with severe leg injury, who died in the waiting area, should also not have been accepted for slaughter but should have been emergency killed immediately after arrival at the plant.

³⁸ The Body Condition Score system of Carrol and Huntington (1988 Equine vet j, 20(1) 41-45) with a scale from 1 to 5 is used for all breeds and all purposes of use.

³⁹ EU audit report 2012 on Argentina: http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_id=3043

⁴⁰ EU audit report 2016 on Uruguay: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3793

Note regarding (q): Since 2012, we have been documenting the presence of severely emaciated horses at all slaughter plants visited. Such horses were not only unfit for human consumption, but also unfit for transport because of their weakened condition and should have never been brought to the slaughterhouses in the first place.

2. Non-compliance with Regulation (EC) No 853/2004 laying down specific hygiene rules for food of animal origin⁴¹

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 slaughterhouses horses that are unfit for transport, unnecessary suffering is caused to them. At all slaughterhouses visited in Argentina and Uruguay in 2017, we saw horses that were in severe pain, and if their condition had already existed before transportation, which is certain in some cases, they were unfit for transport and should have been euthanized on the spot to avoid further suffering. Furthermore, we observed rough and unprofessional handling of horses during unloading at Clay and Sarel, with employees or drivers hitting and poking the animals with flag sticks.

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): At the slaughter plants we visited in Argentina and Uruguay, only the pens in the lairage area have a concrete floor which is easy to clean and disinfect. The floors of the outdoor holding pens and paddocks mainly consist of dirt mixed with manure. They are heavily polluted with faeces and we wonder if they are ever cleaned out. When it rains, these floors turn into deep mud, as we observed during investigations in 2016. While troughs for feeding the animals are present at General Pico, they are not always used. At Lamar, hay bales are carelessly dropped onto the filthy ground. At Clay and Sarel, no hay was offered to the horses during our repeated visits in 2017, although feeding troughs are available in some pens/paddocks.

Observations (b): If there are special pens for sick and suspect animals, they are in many cases not used. From October to December 2017, we once again saw many injured, emaciated, weak or possibly sick horses in the waiting pens of all slaughterhouses visited, which had not been isolated from the other animals, cared for, or euthanized if necessary. Only at Sarel, we observed an “isolation pen” in use. However, only three horses were isolated, while several other injured horses had not been separated from the others. Furthermore, isolating

⁴¹ [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)

injured or sick animals is not a sufficient measure, they would also have to be treated or if necessary emergency killed, which was not the case.

Observations (c): The waiting pens of all slaughterhouses visited in 2017 – with exception of the large paddocks – 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 tightly, while empty pens/paddocks 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.

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**.

Observations point 1: At all slaughterhouses visited in Argentina and Uruguay, horses were observed staying in the waiting pens overnight and/or over the weekend, often in crowded conditions and without feed. The slaughter of suffering animals was observed to be unduly delayed at all plants visited. At Lamar, where horses stay for three days in the waiting pens before slaughter, several injured and lame animals were not released from suffering even though slaughter was taking place, what led to an animal dying. At Clay, a group of horses was documented to stay for more than one month at the “acopio”, among them a seriously injured animal that should have been euthanized without delay.

Observations point 3: According to Argentinian law, horses destined for slaughter must be marked with ear tags at the collection centre (“acopio”), before being shipped to slaughter (see Chapter V). In Uruguay, they have to receive ear tags even before transportation to the “acopio” (see Chapter VI). In 2017, we yet again saw horses without ear tags at all slaughterhouses visited. At General Pico, the large majority of horses were not ear-tagged, while at Lamar, we observed a group of 23 horses receiving ear tags on the slaughterhouse premises in June 2017 (see report “Production of horsemeat in Argentina, June 2017”). At Sarel, single horses were not ear-tagged. At Clay, we filmed that a group of horses was unloaded at Clay’s own “acopio”, marked with ear tags, reloaded immediately and transported over to the slaughter plant (450 m). In Argentina and Uruguay, horses of unknown origin obviously enter the slaughter process and thus the food chain. For many years, we have been pointing out that the Argentinian and Uruguayan system of identification is inappropriate and does not guarantee traceability. In fact, it opens the door to fraud and results in the introduction of stolen⁴² and smuggled⁴³ horses to the horsemeat production chain.

⁴² In 2013, we published a report in German about slaughter of stolen horses in Argentina: “Hehlerware Pferdefleisch aus Argentinien”

⁴³ See newspaper articles in Annex 4 and 5

3. Non-compliance with Regulation (EC) 1099/2009 on the protection of animals at the time of killing⁴⁴

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 **October to December 2017** show once again that EU-approved horse slaughterhouses in Argentina and Uruguay **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:

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 or sick horses are left unattended in the waiting pens/paddocks instead of being humanely killed immediately after arrival in order to avoid further suffering (all plants); this led to an animal dying (Lamar); employees or drivers hit horses and/or spray strong water jets at their faces (Lamar, Clay, Sarel); overcrowded conditions in waiting pens which cause considerable stress and lead to horses biting, kicking and possible injuries (all plants).

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 sun, rain or storm for the large majority of horses (all plants); slippery concrete floor in lairage area, creating the risk of severe injuries (Lamar); manure-covered floors in outdoor pens (all plants); lack of clean and dry resting places as there is no bedding available (all plants).

Observations (d): Seriously injured or sick horses that are unable to move without pain or have severe open wounds are not emergency killed upon arrival but taken to the waiting pens/paddocks (all plants); a large number of horses show clear signs of pain such as lameness, lifting up the injured leg, licking the wound, raising

⁴⁴ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:303:0001:0030:EN:PDF>

the abdominal wall, etc. (all plants); horses are frightened or even panic when being handled by employees, especially when being hit or splashed with water (Lamar, Clay, Sarel⁴⁵).

Observations (e): Horses stay in the waiting pens for 12 hours or more without food (Sarel, Lamar, General Pico⁴⁶); insufficient number of feeding places – just one or two – for the quantity of horses per enclosure (Lamar); weak and submissive horses do not have access to the hay bales as they are chased away by dominant ones (Lamar); horses are kept in paddocks with little or no grass growing but receive no additional hay (Clay, Sarel); hungry horses are observed searching the dirty ground for food (all plants); no access for all horses to the water troughs in the lairage as they are blocked by few animals (Sarel).

Observations (f): Stallions are mixed together with mares (Lamar, Sarel); injured, sick or weak animals are not isolated (all plants); hostile animals are not separated from the others (Lamar, Sarel⁴⁷).

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;**

(c) **the stunning of animals;**

Observations: During unloading horses are hit – including their heads – or poked with flag sticks by employees or drivers (Clay, Sarel⁴⁸); employees handling horses before slaughter appear to be untrained and use violent methods like hitting them with flags and spraying water at their faces (Lamar⁴⁹). We did not have the chance to observe stunning and slaughter, but the latest EU audit report on Uruguay states: “The audit team noted that, out of ten stunned horses observed, one animal received three shots and in another case the time between stunning and bleeding exceeded the six minutes”⁵⁰.

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 (Lamar, June 2017).

Annex II, Paragraph 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.

Observations: Not all horses in the lairage pens have access to the water troughs as they are very crowded and the access is blocked by few animals (Sarel).

⁴⁵ No handling observed at General Pico

⁴⁶ Lairage not observed from close-by at Clay

⁴⁷ No hostile animals observed at Clay and General Pico

⁴⁸ No unloading observed at Lamar and General Pico

⁴⁹ No pre-slaughter handling observed at General Pico and Clay

⁵⁰ EU audit report 2016 on Uruguay: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3793

Annex II, Paragraph 2.4. When a waiting pen is used, it shall be constructed with a level floor and **solid sides**, between the holding pens and the race leading to the point of stunning and designed **so that animals cannot be trapped or trampled**.

Observations: The waiting pens in the lairage do not have solid sides but metal bars, posing a risk of injuries for the horses as their legs can get trapped, especially when horses are mounting; a downer horse got stuck underneath the bars, risking trampling in the overcrowded pen (Lamar).

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: The concrete floor in the lairage area is slippery, especially when wet after hosing down horses; horses are observed slipping and falling (Lamar, June 2017).

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 large majority of the holding pens offer no natural or man-made shelter and thus no protection from sun, rain and storm (all plants); these pens are also used during hot weather as well as during rain and storm (all plants, 2016 - 2017); holding pens which used to provide some shelter in the past now offer no weather protection at all as the fabric roof has completely come down and not been replaced (Lamar, Clay); the size of the only two shelters is completely insufficient for the number of horses in the paddocks (Sarel).

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 and lame horses are taken to the holding pens although they should be slaughtered with priority or, depending on their condition, euthanized immediately after arrival to end their suffering (all plants); this led to an animal dying (Lamar).

Annex III, Paragraph 1.2. Animals shall be **unloaded as quickly as possible after arrival** and subsequently **slaughtered without undue delay**.

Observations: A group of horses remained in the truck parked in the blazing sun at the unloading ramp for more than 55 minutes (Clay); horses stay in the waiting pens overnight and/or over the weekend, often in crowded conditions and without feed (all plants); the slaughter of suffering animals is unduly delayed (all plants); horses stay in the holding pens three days before slaughter (Lamar) and up to one month (Clay), among them seriously injured animals that should have been emergency killed without delay.

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

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

Observations: Employees or drivers hit horses repeatedly with flags and/or sticks, including their heads (Lamar, Clay, Sarel⁵¹); employees spray strong water jets at horses' faces, causing distress (Lamar); a downer horse lying flat underneath the fencing was observed being dragged by the ears (Lamar).

Annex III, Paragraph 1.11. **Animals which are unable to walk shall not be dragged to the place of slaughter, but shall be killed where they lie.**

Observations: A horse was left to die in the holding pens instead of being euthanized on the spot, and another downer horse in the lairage was also left unattended (Lamar).

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 others instead of being isolated, cared for by a veterinarian or emergency killed if necessary (all plants); at Sarel only three horses were isolated but not treated or emergency killed.

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 (all plants).

Since 2012, our investigations have been showing very poor animal welfare conditions at EU-approved horse slaughter plants in Argentina and Uruguay. The most recent EU audits in both countries confirmed animal welfare concerns. It is important to note that our teams observe the plants only from outside and have no possibility to observe the stunning and slaughter of horses, while the EU audit teams have access to all facilities (however announced). During the **latest EU audit in Uruguay in 2016**, the team noted serious deficiencies regarding stunning and bleeding of horses, which had not been detected by the official veterinarian in charge of the official controls and also not by his supervisor (see above violation against Article 7 of Chapter II). The audit report came to the following conclusion: **"Official controls over FBO's⁵² implementation of the animal welfare requirements contained in the Regulation (EC) No 1099/2009 are not effective and therefore they do not provide guarantees supporting the animal welfare attestation** contained in point II.3 of the model certificates "BOV" and "EQU" laid down in Part II of Annex II to Regulation (EU) No 206/2010."⁵³

The most recent EU audit about horsemeat production in **Argentina, held in September 2014, also confirmed that Council Regulation (EC) 1099/2009 is not fully implemented⁵⁴:**

- The Argentinian CCA (Central Competent Authority) 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 (Competent Authority) 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.

⁵¹ No handling observed at General Pico

⁵² Food Business Operator's

⁵³ EU audit report 2016 on Uruguay: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3793

⁵⁴ EU audit report 2014 on Argentina: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3375

V. 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**⁵⁵ 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 to file the pertinent DIRTE for at least 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 have to be **individually identified** according to the identification procedure which is described as follows:

IDENTIFICATION PROCEDURE

a) **Identification has to be effected at Equidae Collection 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 November and December 2017, we once again observed violations against Resolución No 146/2010** which requires that slaughter horses are marked 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, most of the horses were not ear-tagged**, while at Lamar individual horses had no ear tags. **In June 2017, we observed a group of 23 horses being marked with ear tags on Lamar’s premises** (see report “Production of horsemeat in Argentina, June 2017”). Horses of unknown origin obviously enter the slaughter process and food chain.

⁵⁵ <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 chain⁵⁶.

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 slaughterhouse⁵⁷. **At both Lamar and General Pico, we saw horses without the mandatory brand.**

The most recent **EU audit report about horsemeat production in Argentina**⁵⁸ 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.

⁵⁶ In 2013, we published a report in German about slaughter of stolen horses in Argentina: “Hehlerware Pferdefleisch aus Argentinien”

⁵⁷ Hot-iron branding of horses is prohibited in several EU Member States, as it is considered to be an unnecessary and very painful procedure.

⁵⁸ EU audit report 2014 on Argentina: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3375

VI. Non-compliance with Uruguayan legislation regarding traceability

In Uruguay as in Argentina, horses are not considered to be food producing animals until they have been designated for this purpose. **However, all horses born in Uruguay have to be hot-branded by law⁵⁹**. The brand mark has to be applied to the left hindquarters⁶⁰. When there is a change of ownership or a horse is transported from one place to another, a document called “**Guía de Propiedad y Tránsito**” (Proof of Ownership and Transfer) is required. In this document, the brand of the horse has to be indicated (see annex 6). However, there is **no information on medication**. In 2017 and in the years before, we saw numerous horses without the mandatory brand, so this requirement does not seem to be enforced.

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 at the time of our investigation in Uruguay in December 2017 was **Resolución Nº 185/017 of DGSG⁶¹**, which sets rules for the transfer of horses in the national territory, as well as **Decreto Nº 169/010 of DGSG⁶²**, which sets rules for the registration and control of horse collection centres. In Uruguay as in Argentina, horses cannot be sent directly to the slaughterhouse but must first go to an approved collection centre, so-called “acopio”. In Argentina, they are marked with ear tags at the “acopio”, while in Uruguay they have to **receive ear tags before being transported to the “acopio”**.

The national rules regarding equine identification and traceability in Uruguay are the following:

Resolución Nº 185/017, Article 4: FROM THE PASTURE TO THE COLLECTION CENTRE

The horses which are transferred from a pasture to a collection centre have to be identified individually by a visible ear tag and be provided with the following documents: a) Proof of Ownership and Transfer upon exit; b) Individual Identity Document (description). The description will be regarded as a statement under oath and will include at least following items: a) The ear tag’s identification number; b) **Sworn statement from the sending owner** responsible for the horses, stating that: I) The animals were born in Uruguay or, that in the 90 immediate days previous to the transfer the animals have been kept within the national territory, and II) **in the last 180 days previous to the transfer no medication has been administered to them whose administration requires a special waiting period before sending horses to the slaughterhouse** (7th section of decree Nr. 169/010 and rule Nr. 92/010 as of July 14th 2010), and c) a notarized copy of the Proof of Ownership and Transfer upon entrance to the pasture, in case this is applicable. The individual identification by ear tag will be chargeable to the collection centre’s owner.

Decreto Nº 169/010, Article 9: The inspecting officials of the Slaughter of Livestock Division of the General Department of Livestock Services of the Livestock, Agriculture and Fisheries Ministry assigned to horse slaughterhouses will **not accept animals which are not properly identified by ear tags and where following documentation is missing**: A) Proof of Ownership and Transfer, B) “Shipping Certificate of Horses Allocated to Slaughter” issued by a private practicing veterinarian, C) **Individual Identity Document (description) of each horse, including ear tag number and sworn statement**, D) the transport’s cleaning and disinfection records, E) official Sanitary Certificate for shipment to slaughterhouses qualified for export.

The horse slaughterhouses will not accept or slaughter animals which are not fulfilling the ruling of the present decree.

⁵⁹ CÓDIGO RURAL, Actualizado Marzo 2010, Art. 173

⁶⁰ Hot-iron branding of horses is prohibited in several EU Member States, as it is considered to be an unnecessary and very painful procedure.

⁶¹ <http://www.mgap.gub.uy/unidad-ejecutora/direccion-general-de-servicios-ganaderos/normativa/15-05-2017/resolucion-no-185-de>

⁶² <https://www.impo.com.uy/bases/decretos/169-2010>

At the end of December, Resolución N° 185/017 was replaced by **Resolución N° 435/017 of DGSG**. However, the rules regarding transfer of horses from the pasture to the collection centre remain the same (Article 1 and 3 of Resolución N° 435/017). The new regulation was drawn up on 22nd December 2017 but has not yet come into force.

For many years, we have been criticizing the **Uruguayan system of identification as unreliable and not guaranteeing traceability**. In fact, it **opens the door to fraud** and results in the introduction of **smuggled horses** to the horsemeat production chain (see newspaper articles in Annex 4 and 5).

In 2015, we observed on several occasions that horses without ear tags were unloaded directly at the slaughterhouse Clay instead of the “acopio”. During our most recent investigation **in December 2017, we once again observed grave violations against national rules** for equine identification and traceability. At Clay’s own “acopio”, the **majority of the horses we saw were not ear-tagged**. On 7th December, we observed a truck loaded with untagged horses arriving at Clay’s “acopio”. The horses were unloaded, **marked with ear tags on Clay’s premises, reloaded immediately and transported over to the slaughter plant**, which is only 450 meters away from the “acopio”.

The most recent **EU audit report about horsemeat production in Uruguay**⁶³ also mentions deficiencies regarding traceability and identification:

- The audit team saw evidence that one accredited **private veterinarian found guilty for falsification of ear tags' reading** when generating transport certificates was suspended for three months. Shortly after being admitted again to work, he was suspended for a further three months due to another severe deficiency in his performance. The competent authority stated that definitive withdrawal of the accreditation would occur after three consecutive suspensions.
- Documented evidence of police activities carried out between 2014 and 2016 in 18 sites keeping horses (slaughterhouses, traders and collection centres) was presented to the audit team. The audit team noted that **smuggling** was ascertained in five cases, **discrepancies in number of animals** were detected in three cases, the **origin of the animals was unclear** in one case and in another the animals were **not accompanied by the mandatory documents proving the ownership**.
- At the horse slaughterhouse visited, the audit team saw that the **certification of horse meat destined to the EU market was based on the affidavits signed by the owner of the animals**, accompanying the live animals to the slaughterhouse (note: the trader). The audit team noted that **several affidavits (mainly for horses originating from markets and auctions) were not properly filled in**. In particular, in some cases it was not possible to verify the identity of the person who had signed the affidavit.
- Horses for slaughter may be **purchased through auction sites**; the competent authority informed the audit team that usually the horses are brought to the auction site for sale to private entities and, in principle, they are not intended for slaughter, therefore they are **not always accompanied by the affidavits providing information concerning residency and medical treatments**.

The report comes to the following conclusion regarding animal identification and movement: **“The system in place does not provide adequate guarantees concerning the residency and medical treatment requirements contained in the EQU certificate as the official controls do not always verify the reliability of the information provided by FBOs⁶⁴, and on which the certification of horse meat destined to the EU market is based.”**

⁶³ EU audit report 2016 on Uruguay: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3793

⁶⁴ Food Business Operators

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

Our observations in Argentina and Uruguay show that conditions for slaughter horses are not only far below EU standards, but do not meet OIE standards either - despite **both countries being members 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 and Uruguay – 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 and Uruguay 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**

VIII. Conclusion

During our most recent investigations in Argentina and Uruguay conducted from October to December 2017, we observed yet another time that horses destined for slaughter are not treated according to EU standards, neither during transport nor at slaughter plants. We saw that even the much weaker national animal welfare provisions are not respected. The animal welfare concerns that remain unsolved to the present day are:

- Inadequate legislation for the protection of animals during transport and slaughter (see comparisons with EU regulations in Annex 1, 2 and 3);
- 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, lack of water system, metal grid on the floor where horses can get their hooves stuck and break their legs;
- Transport of unfit animals: severely injured, sick, weak or extremely emaciated horses;
- Cruel handling of horses by untrained or incompetent personnel at slaughterhouses;
- Lack of weather protection for the large majority of the horses in all slaughterhouses visited;
- Emaciated, injured and sick horses as well as pregnant mares and new-born foals seen in waiting pens;
- No veterinary care or emergency killing of horses in obvious distress in all places visited;
- Suffering horses left to die unattended and without veterinary care in slaughterhouse pens;
- Severely injured horses left at collection centre for more than one month without veterinary care;
- Crowded conditions in slaughterhouse pens leading to stress, kicking and biting;
- Stallions mixed with mares, injured horses not isolated;
- Stallions with wire through their mouth to prevent biting, which makes it impossible for them to eat and drink and causes permanent pain (observed in December 2016 and June 2017 at Lamar);
- Complete lack of feed, or insufficient number of feeding places leading to horses fighting for access to feed;
- Horses abused at rodeos (“jineteadas”) are sold to EU-approved slaughterhouses, even with broken legs and severe injuries;
- EU-approved slaughter plants with numerous violations of EU Regulation 1099/2009 on the protection of animals at the time of killing: no emergency killing of suffering horses, lack of weather protection, lack of feed, violent handling, etc.

Our three minimum requirements, which are weather protection, emergency killing and appropriate transport vehicles, are still not met in Argentina and Uruguay. In addition to grave welfare concerns, there are also serious problems with traceability. In neither country, there is any 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 marked only at the slaughter horse collection centres, where they are supposed to receive an ear tag and the brand mark “F” meaning “Faena” (slaughter). In Uruguay, the horses are supposed to be marked with ear tags before the transport to collection centres. In both countries, the last owner of the horses (note: the trader) simply has to sign a sworn statement on medical treatments performed during the last six months.

The traceability system in Argentina and Uruguay is weak and insufficient, and moreover it is not followed. A large number of horses observed at slaughterhouses and collection centres were not marked with slaughter ear tags and it remains an open question if they had the accompanying documents which would include the ear tag number. In addition to accepting untagged horses, which by itself is a violation of national legislation, the Uruguayan slaughterhouse Clay was observed committing fraud by eartagging unidentified horses in its own collection centre and sending them straight to slaughter. The same procedure was observed at the Argentinian slaughterhouse Lamar in June 2017.

The 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 horsemeat from Argentina and Uruguay comes in a large part from horses of unknown origin, some of which are likely to have been stolen and/or smuggled. 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 human consumption. 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) do enter the slaughter process.

It is important to note that horses smuggled into Uruguay from Brazil usually originate from the neighbouring Brazilian State of Rio Grande do Sul, where outbreaks of glanders have been notified (see newspaper article in Annex 5).

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), renews its call upon the European Commission to remove Argentina and Uruguay from the list of third countries from which imports of horsemeat are permitted, as an immediate step, as both countries 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 investigations⁶⁵ and several FVO⁶⁶ inspections carried out in other South and North American countries since 2010 revealed similar situations of non-compliance with or non-equivalence to 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 negotiated FTAs, cooperation on capacity-building and increased technical assistance to help the third country improve its animal welfare standards.

Conditional suspensions of horsemeat import 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."⁶⁷ This report clearly points out 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 import of horsemeat is permitted.

We believe that import 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

⁶⁵ See TSB|AWF's reports about horsemeat production in Uruguay, Argentina, Canada & USA from 2015 & 2016.

⁶⁶ The FVO is now called Directorate F of DG Health and Food Safety (DG Sante).

⁶⁷ EU audit report Uruguay: http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3793

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 and slaughter and ensure adequate traceability of animals.

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 (...)

<p>Ramps</p>	<p>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.</p>	<p>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, surfaces shall not be slippery and lateral protections shall be provided so as to prevent animals from escaping; 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>
<p>Space and height inside trailer</p>	<p>Art. 6. Transport vehicles may consist of two floors. 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; 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 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>
<p>Protection from weather</p>	<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>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;⁶⁸</p>

⁶⁸ The German translation of EC 1/2005 concludes: “d.h. sie müssen stets überdacht sein” (i.e. they must **always be roofed**)

	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.	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.
Dividers	Art. 4 e) Internal dividers are permitted in order to separate animals (...)	Annex I, Chapter VI, Additional provisions for long journeys (>8h) 1.6. Equidae shall be transported in individual stalls except mares travelling with their foals.
Floor and bedding	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 (...)	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; 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.
Maximum transport time, feed, water and rest	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 .	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. 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 ;

1.5. After the journey time laid down, animals must be unloaded, fed and watered and be **rested for at least 24 hours**.

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.

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.

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 Nº 46/2014⁶⁹
- EU: - Council Regulation (EC) No 1099/2009 on the protection of animals at the time of killing, Chapters II and III⁷⁰

	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>

⁶⁹ 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)

⁷⁰ According to Article 12, the requirements laid down in Chapters II and III of this Regulation also apply for imports from third countries.

<p>Use of electric prods</p>	<p>---</p>	<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 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.</p>
<p>Competence of employees</p>	<p>Chapter 32, Article 12: (...) The operating personnel which are in contact with the animals have to understand the basics of animal behaviour.</p>	<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> (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).
<p>Animal welfare officer</p>	<p>---</p>	<p>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.</p>

		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	<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 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>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> <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	Chapter 32, Article 4: The animals have to be protected constantly from inclement weather conditions during their stay in the slaughterhouse.	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.
Water supply	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>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</p>

		unloaded, shall have drinking water available to them from appropriate facilities at all times.
Feeding and bedding	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.	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; 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.
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;

		<p>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.</p> <p>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.</p>
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.
Assessment of welfare conditions at arrival	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.	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.
Emergency killing	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	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>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>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>
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<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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Annex 3: Comparison of Uruguayan and EU regulations for the protection of animals at slaughter

Regulations

Uruguay: - Resolución DGSG/ N°152/012

EU: - Council Regulation (EC) No 1099/2009 on the protection of animals at the time of killing, Chapters II and III⁷¹

	Resolución DGSG/ N°152/012	Council Regulation 1099/2009
Animal handling	<p>Article 3. Animals shall be spared any avoidable pain, distress or suffering during the killing and related operations. For this purpose, the business operators shall adopt the adequate measures to ensure that animals:</p> <p>b) will be protected against injuries and mistreating.</p> <p>c) will be handled and housed taking into consideration their normal behaviour.</p> <p>d) will not show signs of pain, fear or other avoidable abnormal behaviour.</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:</p> <p>(c) are handled and housed taking into consideration their normal behaviour;</p> <p>(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:</p> <p>(a) strike or kick the animals;</p> <p>(b) apply pressure to any particularly sensitive part of the body in such a way as to cause animals avoidable pain or suffering;</p> <p>(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;</p> <p>(d) use prods or other implements with pointed ends;</p> <p>(e) twist, crush or break the tails of animals or grasp the eyes of any animal.</p>
Use of electric prods	Not mentioned	Annex III, Article 1.9. The use of instruments which administer electric shocks shall be avoided as far as possible. In any case, such

⁷¹ According to Article 12 of Reg. 1099/2009, the requirements laid down in Chapters II and III of this Regulation also apply for imports from third countries.

		<p>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 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.</p>
<p>Animal welfare officer</p>	<p>Article 17. Animal Welfare Officer: The companies will designate an animal welfare officer in each plant for advice and control procedures. This technician will guarantee compliance to the rules set out in this resolution and those enacted in this regard. For this purpose, he will be allowed to introduce corrective measures, both for the staff and the applied procedures.</p> <p>Article 18. The official in charge of animal welfare will be a veterinarian or a person with a similar qualification recognized by the University of the Oriental Republic of Uruguay and will have to prove expertise in the animal welfare field. (...)</p>	<p>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.</p> <p>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.</p>
<p>Holding pens</p>	<p>Article 3. (...) For this purpose, the business operators shall adopt the adequate measures to ensure that animals:</p> <p>a) will enjoy physical comfort and protection, particularly being kept clean and in adequate temperature conditions, and being prevented from falling or slipping.</p> <p>c) will be handled and housed taking into consideration their normal behaviour.</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:</p> <p>(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> <p>(c) are handled and housed taking into consideration their normal behaviour;</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>

<p>Weather protection</p>	<p>Article 3. (...) For this purpose, the business operators shall adopt the adequate measures to ensure that animals: a) will enjoy physical comfort and protection, particularly being kept clean and in adequate temperature conditions, and being prevented from falling or slipping.</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: (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> <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>
<p>Water supply</p>	<p>Article 3. (...) For this purpose, the business operators shall adopt the adequate measures to ensure that animals: e) will not suffer from long periods without access to water and food.</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 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>
<p>Feeding and bedding</p>	<p>Article 3. (...) For this purpose, the business operators shall adopt the adequate measures to ensure that animals: a) will enjoy physical comfort and protection, particularly being kept clean and in adequate temperature conditions, and being prevented from falling or slipping. e) will not suffer from long periods without access to water and food.</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: (a) are provided with physical comfort and protection, in particular by being kept clean in adequate thermal conditions and prevented from falling or slipping; (e) do not suffer from prolonged withdrawal of feed or water;</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 .
Flooring	Article 3. (...) For this purpose, the business operators shall adopt the adequate measures to ensure that animals: a) will enjoy physical comfort and protection, particularly being kept clean and in adequate temperature conditions, and being prevented from falling or slipping.	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; 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 in holding pens	Not mentioned	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	Article 3. (...) For this purpose, the business operators shall adopt the adequate measures to ensure that animals: b) will be protected against injuries and mistreating. f) will not suffer from avoidable interactions with other animals which could affect their welfare.	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; (f) are prevented from avoidable interaction with other animals that could harm their welfare. 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	Not mentioned	Annex II, Article 2.2. Ramps and bridges shall be equipped with lateral protection to ensure that animals cannot fall off.
Unloading	Not mentioned	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	Not mentioned	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.
Assessment of welfare conditions at arrival	Not mentioned	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.
Emergency killing	Not mentioned	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.
Restraining	Article 14. Following methods of restraint are not authorized: a) To suspend or raise animals which are conscious; b) To tie and seize their legs and hooves by mechanical means; c) To sever their spinal cord, for example with knives or stilettos; d) To use electric current in order to immobilize animals without stunning or killing them under controlled circumstances; particularly applying electric current in any part of the body other than the brain.	Chapter III, Article 15.3. 3. The following methods of restraint shall be prohibited: (a) suspending or hoisting conscious animals; (b) mechanical clamping or tying of the legs or feet of animals; (c) severing the spinal cord, such as by the use of a puntilla or dagger; (d) the use of electric currents to immobilise the animal that do not stun or kill it under controlled circumstances, in particular, any electric current application that does not span the brain.

	<p>Nevertheless, the subsections a) and b) will not apply in regard of suspension hooks used for poultry.</p>	<p>However, points (a) and (b) shall not apply to the shackles used for poultry.</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>Article 5. The animals will be slaughtered only after stunning, according to protocols approved by the Animal Industry Division, as specified in these resolution procedures.</p> <p>Stunning basic methods for authorized species may be mechanical, electrical or other approved by the competent authority.</p> <p>Article 6. The loss of consciousness and sensibility will be maintained until the death of the animal. Stunning procedures that do not cause instant death (so called "simple stunning") will be followed as quickly as possible by a procedure which causes immediate death. The slaughterhouse owners will be responsible for implementing appropriate controls to ensure that animals do not present any signs of consciousness or sensibility in the period between the end of the stunning process and the killing. These checks will be made on a sufficiently representative sample of animals and their frequency is determined taking into account the outcome of previous checks and any factors which may affect the efficiency of the process of stunning. The Handbook of Good Practices specified in paragraph 1 of this resolution will state which measures will be taken in the event that an animal has not been properly rendered insensitive.</p> <p>Article 10. The slaughterhouse owners and personnel designated for that purpose will ensure that during stunning operations adequate replacement equipment is immediately available on site, which will</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>be used in case the original stunning equipment fails. The replacement method may differ from that used in first place. The companies will ensure that the 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 the animal as soon as possible.</p>	
<p>Competence of employees</p>	<p>Article 8. Training: The killing and related operations must be performed solely by qualified staff, which is duly competent for these purposes, without causing pain, distress or avoidable suffering to the animals.</p> <p>Therefore, the training must include the following activities:</p> <ul style="list-style-type: none"> a) Unloading, management of waiting pens; b) Handling and caring of animals before they are restrained; c) Restraining of animals in order to proceed to their stunning or killing; d) Stunning of animals; e) Evaluation of the stunning effectiveness; f) Suspension on hooks or hoisting of living animals; g) Exsanguination of living animals; h) Slaughtering of animals according to religious rites. <p>Once a course has been completed, a certificate of the received training will be issued.</p>	<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> (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).
<p>Guides to good practice</p>	<p>Article 1. The slaughterhouses entitled to export meat to the EU will have to keep a Guideline to Good Practices at their disposal for slaughtering the allowed species, as mandated by the present resolution. They will also keep qualified and trained personnel to perform these activities.</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>

Annex 4: Translation of the article published in the Uruguayan newspaper “El País” on April 10th 2015

At Rivera

Horses from Brazil have been sold to slaughterhouses.

Operation “Tornado”, carried out by BEPRA (Special Brigade for Prevention and Repression of Cattle Rustling), brought into evidence that **three farmers from Rivera illegally entered over 2,000 horses from Brazil during the last three years.**

Rivera / F. Fernández / Friday, April 10th 2015

The inquiry revealed that **the farmers sold about 1,930 horses to several slaughterhouses.** During the inquiry the policemen seized 15 horses on Highway 6, at Villa Vichadero.

They also confiscated nine horses and four cows held by farmers of Paraje Guaviyú, who could not provide any proof of ownership.

The Justice of the Peace of the 7th Section decreed that “the involved people recover their liberty” but they will keep charged for an indefinite time until the arrival of the information requested at the Ministry of Livestock, Agriculture and Fisheries.

In the meantime, **the detectives are convinced that this is only the “tip of an iceberg”, and much more still has to be uncovered.**

This certainty arises from the peculiar features of the land border that separates Uruguay and Brazil.

The inquiry carried out by detectives of the BEPRA since February aimed to verify the **introduction of horses of Brazilian origin to Uruguayan territory, which after being supplied with documentary evidence were sold to “slaughterhouses in the south of the country”,** according to police references.

A farmer from the 8th district of Rivera was investigated, because of selling “approximately 644 horses without proof of their origin or provenience” from 2012 to 2014. Being inquired, this farmer told police that he had purchased them “but he didn't provide names or data of the sellers”.

Two more people were investigated, a couple from Paraje Guaviyú. According to police, this couple marketed 1,286 horses.

On this spot there had been previous inquiries about the introduction of horses from Brazil. Because of this, the horses involved were put under custody, but the property's owner had sold them away and was subsequently prosecuted.

Original text: <http://www.elpais.com.uy/informacion/caballos-brasil-vendidos-frigorificos.html>

Annex 5: Translation of the article published in the Uruguayan newspaper “El País” on August 25th 2015

Alert at the border: The entry of sick horses is feared

Illegal delivery of horses from Brazil to slaughterhouses

At the time the ghost of glanders is overflying the region, the **Squad for Prevention of Cattle Theft (BEPRA) yesterday stopped a truck which transported ten undocumented horses, some of them came from Brazil and had illegally entered the country.**

(Picture): At the premises 23 horses were found and one of them was sick.

Rivera - Freddy Fernández – August 25th, 2015

The seizure of the horses took place at the crossroads of the highways 5 and 30 and due to this circumstance, yesterday four people were declaring at court.

Due to the information obtained from questioning the detainees, policemen from Rivera drove to a farm located on Highway 4, 7 kilometres away from Artigas, where they verified the presence of **23 un-documented horses, one of them being sick**. The premises were seized accordingly and stay under surveillance of the Animal Health Department of the Livestock, Agriculture and Fisheries Ministry, which will have to trace the disease the horse is suffering.

Glanders

This intervention took place after asserting that **in Southern Brazil some cases of glanders were detected**, this is an infectious disease that occurs in horses and that can also be transmitted to humans, causing pneumonia, skin and mucosal surface necrosis, and acute or chronic symptoms which affect lymph nodes.

During investigation it was established that **in a period of six months 324 horses were sold to a slaughterhouse**. Police interrogated a 27-year-old man, owner of the raided farm, who admitted that three of the ten horses transported by the truck were of Brazilian origin.

Other five horses, with unknown origin, were bought from a Uruguayan citizen living in Artigas town for 500 Brazilian Reales each. The owner marked them and sent them to the slaughterhouse with his own “Guía” (*translator's note: proof of ownership*).

Usually, animals which are illegally trafficked from Brazil end up being butchered in slaughterhouses located in the districts of Treinta y Tres and Canelones, as reliable sources told “El País”.

Operation "Tornado"

Last April Operation Tornado was carried out by the BEPRA and revealed that three farmers have been illegally entering more than two thousand horses from abroad for the last three years. The investigation could establish that these **farmers had sold about 1,930 smuggled horses to several slaughterhouses located in the South of our country.**

Investigators are certain among them that this is “the tip of the iceberg” and much more remains to be cleared. This certainty is based on the particular features of the borderline separating Brazil from Uruguay. Between the towns of Masoller and San Luis **there is a distance of 200 kilometres where the border can be easily trespassed.**

Original text: <http://www.elpais.com.uy/informacion/ingreso-ilegal-caballos-brasil-frigorificos.html>

Annex 6: Guía de Propiedad y Tránsito (Proof of Ownership and Transfer)

042-23 4721 098 901 051

B2 Guía de propiedad y tránsito
YEGUARIZOS y CAPRINOS | 879034

La información enunciada en este documento debe ser exacta y de carácter declarativo. No se aceptarán tachaduras ni enmendaduras. NO ENGRAMPAR LAS HOJAS. USAR ÚNICAMENTE PUNTA DE LÁPIZ. No se aceptará tachadura ni enmendadura.

1 - TIPO DE OPERACIÓN (INDICARLO EXPRESAMENTE) Venta Particular

CON CAMBIO DE PROPIEDAD 1 - Marque así NO Marque así
 SIN CAMBIO DE PROPIEDAD 2 - Marque solamente uno. En cada guía solo puede documentarse un solo tipo de movimiento. Envíos a remate y a consignación no representan cambio de propiedad.

2 - ESTABLECIMIENTOS INTERVINIENTES en todos los casos deberán llenarse las casillas A, B, C, D según corresponda (ver instrucciones)

<p>CON CAMBIO DE PROPIEDAD: N° del propietario actual (vendedor) Venta de remate - N° del rematador Venta de consignación - N° de consignatario</p> <p>SIN CAMBIO DE PROPIEDAD: N° del propietario de los ganados</p> <p>A) 330125931 Razón social: <u>Wilfredo Hernández Maldonado</u> Domicilio y documento de identidad: <u>2910231-2</u></p>	<p>CON CAMBIO DE PROPIEDAD: N° del nuevo propietario (comprador) N° del propietario de los ganados Envío a remate - N° del rematador Envío a consignación - N° del consignatario</p> <p>B) 020344792 Razón social: <u>JUAN ANTONIO SCHAVALIA</u> Domicilio y documento de identidad: <u>3232419-5</u></p>
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LUGAR FÍSICO DE SALIDA:
 Razón social: 090628461
 Paraje: Rincón San Rafael Campo Municipal

LUGAR FÍSICO DE LLEGADA:
 Envío a remate: N° de Local Feria
 Razón social: JUAN ANTONIO SCHAVALIA
 Paraje: CARINOS





3 - GANADOS A TRANSPORTAR:

Yeguarizos		Caprinos	
Padrillo 01	Machos reproductores 01		
Yegua 02	Hembras reproductoras 02		
Caballo 03	Hembras adultas 03	/	
Pollino 04	Hembras de cría 04		
TOTAL 10	Machos adultos 05	/	
	Machos juvenes de 1 año 01		
	Machos juvenes de 2 años 01		
	TOTAL 10		

TOTAL Yeguarizos (en letras) Uno. TOTAL Caprinos (en letras) _____

5 - DISCRIMINACIÓN DE YEGUARIZOS POR MARCAS **6 - DISCRIMINACIÓN DE CAPRINOS POR SEÑALES**

N° Ins. Gra. 282446

Marca:    

8 - CONTROL SANITARIO El firmante declara que este ganado es libre de enfermedades que afectan a los animales.

Código de autorización: _____

Oficina: _____ Nombre: _____ Firma: _____

9 - REMITENTE Fecha de emisión de la guía: Día 15 Mes 01 Año 10 Documento de identidad de la firma autorizada: _____

RUC VENDEDOR: _____

Firma autorizada: Wilfredo Hernández Maldonado

Estampa del cadáver. Coloque un número en cada casillero. No tachar. Usar números como en el modelo. 0123456789

ORIGINAL para ser entregado en DICOSE

5 - DISCRIMINACIÓN DE YEGUAZOS POR MARCAS

6 - DISCRIMINACIÓN DE CAPRINOS POR SEÑALES

10 - TRANSPORTE Forma de transporte: 1. Tronco 2. Cabida 3. Ferraterri 4. Otro modo. Marque así:

Itinerario establecido: RUTA 39 - CAMINO LISACH - RUTA INTERCOMERCIAL
RUTA 9 - RUTA 8 - RUTA 11 - CAMINO VECINAD

Nombre transportador: SANTIAGO BASSO. Matrícula: 19671719

Marca vehículo: PLEDES - Matrícula remolque:

11 - AUTORIZACIÓN POLICIAL Fecha: 15/01/10 17:59
Cargo y nombre del funcionario autorizante: Agente de LAURA PERCEGA
Firma: [Firma]

12 - OBSERVACIONES DEL REMITENTE Para modificaciones o salidas de errores cometidos al confeccionar la guía, excepto en cantidad de ganado. Para tener valor deberán ser firmadas por el responsable del transporte.

13 - OBSERVACIONES DURANTE EL TRANSPORTE Para hacer constar todo cambio con respecto a la estabilidad (pasajeros, P. D., Placas o jeringas de anestesia, cambio de vehículo o itinerario, etc.). Para tener valor deberán ser firmadas por el responsable del transporte.

14 - INSPECCIÓN EN RUTA Fecha: Día Mes Año Lugar:
Observaciones:
Cargo y nombre del funcionario actuante: Firma:

15 - LLEGADA A DESTINO Fecha: Día Mes Año Hora Minutos Observaciones de destrucción: Para tener valor deberán ser firmadas.
Observaciones: Firma:

16 - RECIBIDO PARA ENTREGAR A D.E.CO.SE Fecha: Día Mes Año Hora Minutos Repartición:
SELO DE LA OFICINA RECEPTORA (no salir de este espacio)
Cargo y nombre del funcionario receptor: Firma:

Escriba con cuidado. Coloque un número en cada casilla. No tachar. Utilice números como en el ejemplo: 0 1 2 3 4 5 6 7 8 9