

## **Transport of ovine animals from Bulgaria to Turkey**

**Place of observation: Kapikule (border between Bulgaria and Turkey)**

**Date of observation: 08.10.2012**

### **I. INTRODUCTION**

During numerous investigations in the past (April/May 2011, June 2011, August 2011, January 2012, April 2012) Animals' Angels had already observed irregular transports originating from Bulgaria and destined to Turkey and had informed the Bulgarian authorities about the detected infringements of Council Regulation (EC) No 1/2005. In April 2012 Animals' Angels also held a meeting with representatives of the Bulgarian Food Safety authority to discuss the observed problems. As communicated to Animals' Angels the Bulgarian Food Safety authority took various measures to remedy the shortcomings.

Nevertheless on 08.10.2012 Animals Angels again observed seven irregular transports of lambs and sheep originating from Bulgaria and destined for Turkey. The transports were observed at the border Kapitan Andreevo/Kapikule between Bulgaria and Turkey, in the Turkish customs area. As shown below numerous irregularities were observed, although all these transports had been authorized by the Bulgarian authorities at the places of departure and although these transports had passed the veterinary checks at the Bulgarian EU exit point.

It should be stressed that this time the possibilities to properly examine the transports in the Turkish customs area were very limited, i.e. it was only possible to observe the transports for a very short time. Therefore it must be presumed that in reality there were more irregularities than the ones listed below, which, however, remained undetected.

## II. FINDINGS

### Truck no. 1

**License plate:** T 2277 XT (front) / T 1314 EE (back) (Bulgaria)  
**Description of vehicle:** white cab, white and blue semi-trailer with gooseneck  
**Ear tags:** Bulgarian

Sheep are loaded on three decks (in the main body of the truck as well as in the gooseneck)

#### **Irregularities observed:**

- Insufficient ceiling height on first deck of goose neck, several animals are touching the ceiling with their heads
- Adequate ventilation hindered by insufficient ceiling height
- Several animals are coughing
- Straw bedding: very dirty
- Insufficient number of drinking devices in relation to the number of animals loaded (5 nipples on the left side in the main part of the truck plus 2 in the goose neck; no nipples on the right side)
- Truck not equipped with a ventilation system capable of maintaining a range of temperature from 5°C to 30°C (with a +/- 5°C tolerance)



*Animals touching the ceiling with their heads.*

## **Truck no. 2**

**License plate:** T 8881 XT (front)/ T 4090 EE (back) (Bulgaria)  
**Description of vehicle:** white cab, grey semi-trailer, no gooseneck  
**Ear tags:** Bulgarian, example: BG D30 2125134

Ovine animals are loaded on four decks.

### **Irregularities observed:**

- Clearly insufficient ceiling height, many animals touch the ceiling with their backs and heads
- Adequate ventilation hindered by insufficient ceiling height
- Several animals are coughing
- Truck not equipped with a ventilation system capable of maintaining a range of temperature from 5°C to 30°C (with a +/- 5°C tolerance)



### **PLEASE NOTE:**

**Animals' Angels already observed the same semi-trailer on two previous occasions (namely on 03.05.2011, as well as on 20./21.01.2012) transporting ovine animals from Bulgaria to Turkey. Among other infringements also insufficient ceiling height was observed. This had been communicated to the Bulgarian authorities.**

### **Truck no. 3**

**License plate:** T 3030 XT (front)/ T 4864 EE (back) (Bulgaria)  
**Description of vehicle:** white cab, grey semi-trailer with red frame and goose neck  
**Ear tags:** Bulgarian, example: BG D30 2125642

Ovine animals are loaded on four decks in main body of truck and on three decks in goose neck.

#### **Irregularities observed:**

- Clearly insufficient ceiling height, on first floor almost all animals touch the ceiling with head or back
- Adequate ventilation hindered by insufficient ceiling height
- Many animals are coughing and have nasal discharge
- Truck not equipped with a ventilation system capable of maintaining a range of temperature from 5°C to 30°C (with a +/- 5°C tolerance)



#### **PLEASE NOTE:**

**Animals' Angels observed the same semi-trailer already on 23.08.2011 transporting ovine animals from Bulgaria to Turkey. Among other infringements also insufficient ceiling height and compromised ventilation was observed. This had been communicated to the Bulgarian authorities.**

## **Truck no. 4**

<b>License plate:</b>	T 0080 AT (front) / T 2002 EE (back) (Bulgaria)
<b>Description of vehicle:</b>	white cab, white and blue semi-trailer with goose neck
<b>Number of animals:</b>	450
<b>Ear tags:</b>	Bulgarian, example: BG D30 212 4944
<b>Place of loading:</b>	Agrokomers-98 LTD, Str. Generalska, 20, Omurtag, Bulgaria, approval number: 79250111
<b>Country and region of origin:</b>	Bulgaria, Targovishte, BG 25
<b>Country and region of destination:</b>	Turkey, Balikesir
<b>Category:</b>	for slaughter
<b>Certificate number:</b>	00729

Ovine animals are loaded on four decks in main body of truck and on three decks in the gooseneck.

### **Irregularities observed:**

- Clearly insufficient ceiling height; on first deck practically all animals touch the ceiling with head or back; as far as visible the situation on the 2<sup>nd</sup> and 3<sup>rd</sup> deck is the same; the ceiling of the 4<sup>th</sup> floor is lifted up
- Insufficient number of drinking devices in relation to the number of animals loaded (6 water nipples on the right side; none on the left side)
- Truck not equipped with a ventilation system capable of maintaining a range of temperature from 5°C to 30°C (with a +/- 5°C tolerance)



### **PLEASE NOTE:**

**Animals' Angels observed the same semi-trailer already on 29. and 30.04.2011 transporting ovine animals from Bulgaria to Turkey. Among other infringements also insufficient ceiling height was observed. This had been communicated to the Bulgarian authorities.**

### **Truck no. 5**

**License plates:** T 0090 AT (front) / T 4863 EE (back) (Bulgaria)  
**Description of vehicle:** white cab, grey semi-trailer with red frame and goose neck  
**Ear tags:** Bulgarian, example: BG D30 212???

Ovine animals are loaded on four decks in main body of truck and on three decks in the gooseneck.

#### **Irregularities observed:**

- Insufficient ceiling height, many animals touch the ceiling
- Some animals are coughing, some have nasal discharge
- Truck not equipped with a ventilation system capable of maintaining a range of temperature from 5°C to 30°C (with a +/- 5°C tolerance)

### **Truck no. 6**

**License plates:** T2595CT / T4866EE (Bulgaria)  
**Description of vehicle:** Truck with trailer, grey light blue

Young sheep are loaded on three decks.

#### **Irregularities observed:**

- The loading density (1<sup>st</sup> deck) seems too high since animals are standing above the ones lying down and there is no place left.
- All animals observed have snotty noses and many sheep are coughing. Some sheep are breathing heavily.
- Insufficient bedding material, the straw is wet with urine and faeces.
- Truck not equipped with a ventilation system capable of maintaining a range of temperature from 5°C to 30°C (with a +/- 5°C tolerance)
- Insufficient number of drinking devices in relation to the number of animals loaded (lorry and trailer are each equipped with only four water nipples per deck; furthermore there are spray nipples in each of the four corners of lorry and trailer- spray nipples, however, cannot be regarded as adequate drinking device.

### **Truck no. 7**

**License plates:** H 2728 BB (front) / H 6594 EE (back) (Bulgaria)  
**Description of vehicle:** white and blue cab; grey semi-trailer with blue stripes  
**Ear tags:** Bulgarian, example: BG D 29 0568882

Sheep are loaded on three decks.

#### **Irregularities observed:**

- Insufficient number of drinking devices in relation to the number of animals loaded and drinking devices not accessible by all animals (there is one water nipple in each of the four corners of the truck; apart from those there is only one single device visible (on the left side of the truck), which could possibly be a spray nipple. There are several dividers placed; thus the animals placed in the middle compartment do not have access to a drinking device. Spray nipples are not to be regarded as an adequate drinking device.)
- Truck not equipped with a ventilation system capable of maintaining a range of temperature from 5°C to 30°C (with a +/- 5°C tolerance)

### III. VIOLATIONS of COUNCIL REGULATION (EC) No 1/2005

#### 1. Insufficient ceiling height

In 5 out of the 7 described transports the ceiling height was insufficient. Thus animals touched the ceiling with their heads and backs and therefore were unable to stand in an upright natural position during long-distance transports. Besides this insufficient ceiling height compromised an adequate ventilation.

**This represents a violation of Article 3 lit.(g) and of Annex I, Chapter II, point 1.2. of Council Regulation (EC) No 1/2005.**

**Furthermore it represents a violation of Article 3, first sentence, as undue suffering was caused to the animals – especially because the animals were transported on long-distance.**

According to the Scientific Committee of Animal Health and Animal Welfare (SCAHAW) the space above the top of the head of sheep (as the highest point of them) should be 15 cm for vehicles with good forced ventilation systems and at least 30 cm for vehicles without forced ventilation.<sup>1</sup> These recommendations were confirmed by the European Commission in 2009<sup>2</sup>, as well as in 2011, when the EU Commission sent a clarifying letter (dated 10.08.2011) to the Chief Veterinary Officers of the Member States about the measures to adopt in order to ensure compliance with the requirements of Regulation (EC) No 1/2005 regarding the internal heights.

#### 2. Deficiencies regarding the water system

In 4 out of the 7 described transports the number of drinking devices was insufficient in relation to the number of animals loaded. Thus it could not be guaranteed that all animals had access to water.

**This represents a violation of Annex I, Chapter VI, point 2 of Council Regulation (EC) No 1/2005.**

**Furthermore it represents a violation of Article 3, first sentence, as undue suffering was caused to the animals on these long-distance transports.**

#### 3. Animals with signs of respiratory disorders

In 5 out of the 7 described transports animals were observed who suffered from cough and/or nasal discharge.

These animals either suffered already at the moment of loading from respiratory disorders and thus should not have been loaded or the signs of respiratory disorders developed during the transport. In both cases transport caused undue suffering to the animals.

**This represents a violation of Article 3, first sentence, as undue suffering was caused to the animals on these long-distance transports.**

<sup>1</sup> Report of the Scientific Committee on Animal Health and Animal Welfare (SCAHAW) "The Welfare of Animals during Transport", March 2002, page 98

<sup>2</sup> Letter by European Commission, dated 04.09.2009, SANCO D5 DS/fr D(2009)450334

**4. Insufficient ventilation systems**

None of the 7 transports described above was equipped with a ventilation system capable of maintaining a range of temperature from 5°C to 30°C (with a +/- 5°C tolerance) within the animals' compartments.

**This represents a violation of Annex I, Chapter VI, point 3.1. of Council Regulation (EC) No 1/2005.**

**5. Insufficient bedding material**

Transports were observed whose bedding material was inadequate to absorb urine and faeces during transport and thus inadequate to guarantee the animals' comfort during transport.

**This represents a violation of Annex I, Chapter VI, point 1.2. of Council Regulation (EC) No 1/2005.**

## **IV. CONCLUSIONS**

In long-distance transport of live animals the relevant legislation on the protection of animals is regularly ignored.

As experience shows the competent authorities are obviously unable to cope with the control tasks in order to enforce the legislation. The irregular transports described above have been authorized by the competent Bulgarian authorities at the places of departure and they passed the veterinary check at the Bulgarian exit point from the EU unchallenged. None of these authorities intervened to remedy the shortcomings.

After Animals' Angels had informed the Bulgarian Food Safety Authority about the irregularities observed in April/May 2011, June 2011, August 2011 and January 2012, the Bulgarian Food Safety Authority communicated to have taken various actions in order to enforce the relevant legislation.

Nevertheless Animals' Angels again observed transports originating from Bulgaria that very obviously violated the legislation – 7 irregular transports were observed in just one day. Three out of these 7 transports were vehicles that Animals' Angels had already observed in the past violating legislation and had informed the Bulgarian authorities about it. Obviously the enforcement measures taken did not have the required effect.

As a consequence animals continue to suffer on long-distance transports.

## **V. NECESSARY MEASURES**

**Animals' Angels calls upon the European Council, the European Commission and the European Parliament to limit the transport time for commercial transports of live animals to an absolute maximum of 8 hours.**

**Animals' Angels calls upon the Bulgarian authorities to finally enforce the currently applicable Council Regulation (EC) No 1/2005.**



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TO  
MRS JULIA HAVENSTEIN  
ANIMALS' ANGELS  
ROSSERTSTRASSE 8  
D- 60323 FRANKFURT

**Subject: transport of ovine animals from Bulgaria to Turkey, Kapikule, 08.10.2012**

**DEAR MRS HAVENSTEIN,**

Hereby, I would like to thank you about your signal for non-compliance of Regulation 1/2005/EC about transporting of small ruminants from Bulgaria to Turkey with Bulgarian vehicles.

The transport of small ruminants were performed with the transport vehicles with registration numbers: **T2277XT/T1314EE; T8881XT/T4090EE; T3030XT/T4864EE; T0080AT/T2002EE; T0090AT/T4863EE; T2595CT/T4866EE** owned by a company "Ismet Shabanov-Olimp 131" Ltd.

The Transport Company is approved for a long journey in accordance with the requirements of Council Regulation 1/2005/EC, with license №0121/14.06.12.

Upon the information set in your report, the official veterinarians of Targovishte region have performed a check for the compliance of the transport vehicles with the requirements of Regulation 1/2005/EC for a long journey. Due to the findings the official veterinarian has issued on the owner of the transport company "Ismet Shabanov-Olimp 131" Ltd. a "Prescription act" №000175/27.11.2012 for compliance with the requirements of Article 6 (3) according with Paragraph 1.2 of Chapter II of Annex I to Regulation 1/2005/EC

Please accept the assurances of my highest consideration.

Dr DAMYAN ILIEV,  
Chief Veterinary Officer