

3. ANALYSIS OF IRREGULARITIES DETECTED DURING THE NON-DISCRIMINATORY INSPECTIONS

Table 4 shows the total number of non-compliances. It also shows the percentage of non-compliances coming under each category and the percentage of total inspections which found non-compliances.

Table 4. Number and prevalence of non-compliances recorded during inspections for each category of non-compliance

<i>Category of non-compliance</i>	Number of non-compliances	% of the total of non-compliances	% of total inspections
1. Fitness of animals for transport	118	26.0%	0.7 %
2. Transport practices, space allowances, height	121	26.7 %	0,7 %
3. Means of transport and additional provisions for livestock vessels or vessels transporting sea containers and for long journeys	24	5.3 %	0.1 %
4. Watering and feeding, journey times and resting periods	43	9.5 %	0.3 %
5. Documentation	115	25.3 %	0.7 %
6. Other cases of non-compliance	33	7.3 %	0.2 %
Total number of non-compliances	454	100.0 %	2.7 %

Analysis of the above table shows that the irregularities most frequently encountered in the course of the inspections related to Transport practices, space allowances, height (26.7 %), Fitness of animals for transport (26%) and Documentation (25.3 %). The percentages were lower for non-compliances relating to "Watering and feeding, journey times and resting periods" (9.5%) and "Means of transport..." (5.3%), while the category "Other cases of non-compliance" was at 7.3%. The overall rate of non-compliances (454) for all inspections (18 275) was 2.7 %, as it was in 2015. In other words, for every hundred inspections, slightly fewer than three non-compliances were found.

Table 5. Percentage of non-compliant inspections out of the total number of inspections, in 2015 and 2016

<i>Category of non-compliance</i>	% of total non-compliances	% of total non-compliances
	2015	2016
1. Fitness of animals for transport	21.4 %	26.0 %
2. Transport practices, space allowances, height	22.4 %	26.7 %
3. Means of transport and additional provisions for livestock vessels or vessels transporting sea containers and for long journeys	8.1 %	5.3 %
4. Watering and feeding, journey times and resting periods	6.9 %	9.5 %
5. Documentation	35.8 %	25.3 %
6. Other cases of non-compliance	5.5 %	7.3 %
Total number of non-compliances	100.0 %	100.0 %

A comparison with 2015 (**Table 5**) shows some changes in the percentages for different non-conformity categories: in 2016, the category "Documentation" was down from 35.8% to 25.3%; the category "Fitness of animals for transport" was up from 21.4% to 26%; the category "Transport practices, space allowances, height" was up from 22.4% to 26.7%.

Table 6 shows the percentage breakdown of non-compliances by type of inspection conducted by the competent authority in 2016 and 2015, highlighting the differences between the two years.

Table 6. Percentage distribution of non-compliances by type of inspection carried out by the competent authority in 2015 and 2016.

<i>Types of non-discriminatory inspections</i>	2015			2016		
	Type 1	Type 2	Type 3	Type 1	Type 2	Type 3
<i>Category of non-compliance</i>						
1. Fitness of animals for transport	45.9 %	11.6 %		51.3 %	18.1 %	
2. Transport practices, space allowances, height	23.6 %	23.1 %		20.9 %	29.8 %	
3. Means of transport and additional provisions for livestock vessels or vessels transporting sea containers and for long journeys	4.7 %	10.0 %		1.7 %	6.7 %	
4. Watering and feeding, journey times and resting periods	4.7 %	8.2 %		2.6 %	12.3 %	
5. Documentation	17.6 %	40.4 %	100.0 %	19.1 %	24.5 %	100.0 %
6. Other cases of non-compliance	3.4 %	6.7 %		4.3 %	8.6 %	
Total number of non-compliances	100 %	100 %	100 %	100 %	100 %	100 %

For type 1 inspections, the highest percentages in 2016 were found in the 'Fitness of animals for transport' category, accounting for 51.3 % of the total, followed by 'Transport practices, space allowances, height' at 20.9 % and 'Documentation' at 19.1 %.

Much lower percentages were found for the non-compliances "Means of transport etc.", "Watering, etc." and "Other cases".

In type 2 inspections, the most frequent non-compliances were in the category "Transport practices, space allowances, height" at 29.8%. Non-conformities in the category "Documentation" accounted for 24.5%, whilst those relating to "Fitness of animals for transport" accounted for 18.1%.

Type 3 inspections are on documentation only, meaning that the category “Documentation” accounted for 100% of that total.

If we compare non-compliances in 2016 and 2015, the most glaring difference can be seen for type 2 inspections, where non-compliances in the category "Documentation" fell from 40.4% to 24.5%; non-compliances relating to "Fitness of animals for transport" rose from 11.6% to 18.1%; the category "Transport practices, space allowances, height" saw a rise from 23.1% to 29.8%. The greatest change in type 1 inspections related to “Fitness of animals...”, which rose from 45.9% to 51.3%.

The percentage breakdown of non-compliances per species of animal transported is shown in **Table 7**.

Table 7. Percentage distribution of non-compliances per animal species

<i>Category of non-compliance</i>	Species of animal transported								
	Bovines	Pigs	Sheep/ Goats	Equidae	Poultry	Rabbits	Fish	Dogs	Other animals
1. Fitness of animals for transport	31.7 %	13.0 %	5.3 %	21.4 %	13.0 %	33.3 %	28.6 %	29.6 %	40.0 %
2. Transport practices, space allowances, height	22.1 %	48.1 %	26.3 %	8.9 %	39.1 %	33.3 %	28.6 %	29.6 %	50.0 %
3. Means of transport and additional provisions for livestock vessels or vessels transporting sea containers and for long journeys	7.2 %	1.9 %	10.5 %	8.9 %	4.3 %	0.0 %	0.0 %	0.0 %	0.0 %
4. Watering and feeding, journey times and resting periods	8.2 %	1.9 %	15.8 %	1.8 %	0.0 %	0.0 %	0.0 %	29.6 %	0.0 %
5. Documentation	23.6 %	27.8 %	26.3 %	50.0 %	26.1 %	33.3 %	42.9 %	8.5 %	10.0 %
6. Other cases of non-compliance	7.2 %	7.4 %	15.8 %	8.9 %	17.4 %	0.0 %	0.0 %	2.8 %	0.0 %
Total number of non-compliances	100 %	100 %	100 %	100 %	100 %	100 %	100 %	100 %	100 %

The most frequently encountered non-compliances by species were the following:

- "Fitness of animals for transport" for other animals, rabbits, bovines, dogs and fish;
- "Transport practices, space allowances, height" for other animals, pigs, poultry, rabbits, dogs and fish;
- "Documentation" for equidae, fish, rabbits, pigs, sheep, goats and poultry.

"Documentation" non-compliances accounted for more than 23% for all species except for dogs and "other animals".

The percentages of non-compliance for each type of inspection for the species of animal transported are shown in **Table 8 a** and **8 b**.

Table 8 a. Percentage of non-compliances with the requirements of Regulation No 1/2005 compared to the total number of each type of inspection, for bovines, pigs, sheep, goats, equidae and poultry.

	Bovines			Pigs			Sheep/goats			Equidae			Poultry		
	1	2	3	1	2	3	1	2	3	1	2	3	1	2	3
Total number of non-compliances (a)	70	130	8	19	31	4	2	17	0	8	47	1	8	15	
Number of non-discriminatory inspections (b)	4874	1277	450	3120	893	108	3115	161	114	377	389	68	1227	196	
(a)/(b)	1.4 %	10.2 %	1.8 %	0.6 %	3.5 %	3.7 %	0.1 %	10.6 %	0.0 %	2.1 %	12.1 %	1.5 %	0.7 %	7.7 %	

Table 8 b. Percentage of non-compliances with the requirements of Regulation No 1/2005 compared to the total number of inspections for each type of inspection, for rabbits, fish, dogs and other animals.

	Rabbits			Fish			Dogs			Other animals		
	1	2	3	1	2	3	1	2	3	1	2	3
Total number of non-compliances (a)	2	4		2	5		0	71		4	6	
Number of non-discriminatory inspections (b)	164	31		30	239		59	80		1	112	
(a)/(b)	1.2 %	12.9 %		6.7 %	2.1 %		0.0 %	88.8 %		400 %	5.4 %	

The percentages thus calculated represent the average number of non-compliances per 100 inspections.

For bovines, sheep/goats, equidae, rabbits and dogs, the higher percentages refer to type 2 inspections.

One particularly high value is for "Other animals/Inspection type 1", with 4 non-compliances for one inspection, but this result is not significant given that the number of inspections was so low. However, the high value for "Dogs/Inspection type 2" is significant.

Overall, when the 2016 data are compared with those of the previous years, the recurrence of certain categories of non-compliance is confirmed. In particular, even if far lower than in 2015 (Table 5), there are still difficulties in complying with the requirements for accompanying documentation, whatever the type of inspection or species of animal. The exception to this is for dogs, for which the percentage with reference to this category of non-compliance fell sharply in 2016 (8.5% compared to 50% in 2015).

Moreover, in 2016, compared to the previous year, it can be seen that, in general, there was a rise in non-compliances in the categories "Fitness of animals for transport", and "Transport practices, space allowances, height". This latter category of non-compliance showed a significant rise compared to the previous year for dogs (29.6% in 2016 compared to 5.6% in 2015).

This trend will have to be monitored in future years as it could indicate that less attention is being paid to the conditions in which the animals are transported and the means of transport used.

Regarding the category and number of actions taken by the competent authorities, as shown in Table 3, the non-compliances that were found gave rise to sanctions (“Penalties”) and the implementation of measures to safeguard animal welfare (“Measures”) and “Exchanges of information” between the competent authorities.

It can be seen from the table that, in 2016 as well, the total number of non-compliances recorded (454) for the three types of inspection (1, 2 and 3) gave rise to a lower number of penalties (298). This is because an inspection may uncover several non-compliances with the provisions of Regulation (EC) No 1/2005, for all of which a single penalty is imposed. Moreover, unlike the previous year, in 2016 the number of “Penalties” did not also correspond to the number of “Measures” and “Exchanges of information”. It can be assumed that, in 2016, the “Measures” and “Exchanges of information” imposed pursuant to Articles 23 and 26 of Regulation (EC) No 1/2005, could have referred to more than one “Penalty”, or, the other way round, several “Measures” could have been imposed with reference to a single penalty.

2. ACTION PLAN TO ADDRESS THE DEFICIENCIES DESCRIBED UNDER POINT 1.

An analysis of the main non-compliances found in **2016** during the transport of live animals shows that the competent authorities must continue to pay close attention to meeting these objectives:

- 1) informing and educating all operators involved in the transport of live animals; improving the training of persons tasked with inspecting compliance with the rules on the protection of animals during transport;
- 2) stepping up and scheduling checks on the basis of appropriate risk assessment criteria.

With regard to *training and information*, there continue to be organised in the various Italian regions training courses focusing on the issue of certificates of competence for drivers and attendants, as provided for by Regulation (EC) No 1/2005, with the assistance of specific veterinary trainers to ensure that all new operators receive the same training.

Regular training courses are organised with the active participation of experts from the Ministry veterinary services, the Regions and the Local Health Authorities for persons responsible for enforcing compliance with the rules on the protection of animals during transport (official veterinarians of the Local Health Authorities and the police).

The training programme provided for by the Memorandum of Understanding signed between the Ministry of Health and the Ministry of the Interior on 3 October 2011 on coordinating and stepping up checks on the legality of operations in the international animal transport sector, involved the Ministry of the Interior organising three training courses on the transport of live animals for 180 police traffic patrol officers between February and May 2016. The course was taught by experts from the Ministry of Health and the Reference Centre for Animal Welfare of the Brescia Zoophylactic Institute.

The measures geared towards *stepping up and scheduling checks on the basis of appropriate risk assessment criteria*, include implementation by the Regions of the National Animal Welfare Plan covering minimum checks on the protection of animals during transport to be carried out in Italy each year, on the basis of risk criteria set out in that Plan, as well as the Ministry of Health and the Ministry of the Interior continuing to implement the Memorandum of Understanding on coordinating and stepping up checks on the legality of operations in the international animal transport sector by means of concerted action on the part of the two authorities intended to standardise – in quantitative and qualitative terms – roadside checking activities on vehicles carrying live animals. To this end, the Ministry of Health each year invites the offices responsible for implementing joint checks to produce a schedule of checks, taking into account the results obtained the previous year, the strengths and weaknesses revealed, and analysis of the live animal trade patterns that characterise movements within the region.