

Analysis of Transport Non-Compliances 2009 and Specific Actions to Address Deficiencies:

Table (1) Transport: National Type I and unregistered vehicle inspections (DVO and VPHSIS)

Category of non-compliance	Specific details of non-compliance	No of non-compliances identified in 2009	Analysis of non-compliance	Action plan to address specific non-compliance
Procedures:	Segregation of animals during transport	1	One non-compliance in relation to inappropriate segregation of animals during transport was recorded in 2009. This is indicative of an high degree of compliance in this area.	No specific action will be taken in relation to this particular non-conformity other than to continue to enforce the requirements in relation to the appropriate segregation of animals during transportation.
Hygiene:	Vehicle not cleansed prior to loading	3	Only 0.2% out of the total of 1142 national vehicle inspections carried out in the area of vehicle cleansing and disinfection in 2009 were recorded as deficient. The Irish authorities believe that this result is indicative of an high degree of compliance in this area.	The system for inspecting livestock marts has been revised and updated to include a greater emphasis on carrying out vehicle checks at the mart premises and on ensuring appropriate equipment for the cleaning and disinfection of vehicles is provided by marts and available to all transporters (see Ongoing Action Plan part (a) below for further detail).

Structural :	Roof absent	8	The requirement for a roof in vehicles used to transport animals within Ireland depends on a variety of issues such as the length of the intended journey and the prevailing weather conditions. This category of national transport vehicles routinely includes farm vehicles e.g. where an animal is transported by its keeper. Such vehicles may not have a roof in place. The format of the current inspection form requires the inspector to check for a roof on the vehicle and where the roof is absent this is recorded as a non-compliance even though in the case of animals being transported short distances e.g. to a livestock mart or a slaughter plant, a roof may not be a requirement.	The current inspection form will be amended to take into account the variation in the requirement for a roof on vehicles used to transport animals short distances e.g. in the case of a keeper's own vehicle.
	Sharp projections	2	Such minor structural non-conformances occur as a result of routine wear and tear of vehicles and in most cases such minor issues can be rectified relatively easily. Six of the non-compliances in question were recorded for one vehicle. The transporter was notified of the non-compliances and the vehicle was re-inspected 7 days later. All of the issues had been addressed on re-inspection. The other non-compliance related to a different vehicle and was rectified on the spot.	No specific additional action will be/was taken in relation to these points of non-conformity.
	Broken/loose fixtures	3		
	Deficient internal partition	2		

Table (2) Transport: International Type 2 Vehicle Inspections (DVO and VPHSIS)

Category of non-compliance	Specific details of non-compliance	No of non-compliances identified in 2009	Analysis of non-compliance	Action plan to address specific non-compliance
Hygiene and maintenance:	Inadequate cleansing of vehicle	3	Only 0.7% of international transport inspections carried out in 2009 recorded non-compliances in this area and these were rectified immediately.	All export assembly centres are required to have adequate vehicle cleansing and disinfection equipment in place. Currently all consignments of cattle/sheep/pigs being exported from assembly centres are supervised by a Veterinary Inspector (VI). This supervision also involves an inspection of the transport vehicle and completion of an vehicle checklist /inspection form, which ensures on an ongoing basis that high standards of vehicle hygiene are maintained.
	Broken water pipe (drinking system)	1	Such non-compliances occur as a result of normal wear and tear to transport vehicles. In this case the broken pipe was repaired before loading commenced.	As above, the supervision of all consignments of animals for export ensures that any problems with vehicle maintenance are identified and addressed before the animals are loaded.
Procedures :	Loading problems	2	One non-compliance in this category referred to an animal being injured during loading, which though uncommon, can occur due to the high level of activity associated with the loading process.	As above, the supervision of all consignments of animals for export ensures that any problems during loading are identified and addressed before the animals are transported.

	Absence of vehicle approval	1	This non-compliance was recorded as part of a re-approval inspection for a vehicle. The vehicle was subsequently approved.	As above, no specific action was/will be taken in relation to this issue. The supervision of all consignments of animals for export ensures that any problems identified and addressed before animals are transported.
Structural :	Absence of temperature sensor	1	This non-compliance was identified prior to the vehicle being used to transport animals and therefore the issue could be rectified before the animals were loaded.	As above, the supervision of all consignments of animals for export ensures that any problems during loading are identified and addressed before the animals are transported.

Table (3) Transporter Infringements

Category of non-compliance	Specific details of non-compliance	No of non-compliances identified in 2009**	Analysis of non-compliance	Action plan to address specific non-compliance
Journey Logs	Journey times and rest periods not adhered to	4	Two of these infringements refer to required journey times being exceeded and two refer to inadequate rest periods (e.g. animals were rested for two separate periods of 12 hours in one case instead of the required 24 hours). In all cases the transporters involved were issued with a warning letter reminding them of the obligations regarding respecting journey times and rest periods. There were no repeat infringements in the area of journey times/rest periods in 2009 for any of the transporters involved.	In the cases of all transporter infringements DAFF writes to the transporter involved seeking an explanation regarding the specific non-compliance and outlining his/her obligations under the regulations. If a satisfactory reply is not received or in the event of a repeat offence an official warning will issue to the transporter and he/she will be informed that suspension of his/her transporter authorisation could ensue. Suspension of a transporters authorisation did not occur in 2009.

Journey log not available to relevant CA during journey (allegedly)	1	The driver of the vehicle failed to present the journey log to the CA of a country through which he was passing. However he was able to provide the Irish CA with a copy of the completed journey log at a later date. It is possible that there were communication difficulties and that the driver involved did not understand what was being asked of him.	As above such non-compliances are dealt with by writing to the transporter involved and reminding him/her of their obligations regarding ensuring the availability of journey logs to the relevant authorities at all times during any journey.
Journey log not completed properly	2	In both cases certain details were missing from the journey logs involved and the pages were not fastened together as required. Most transporters are well aware of the requirement regarding the correct completion of journey logs and the system in Ireland whereby a VI supervises the loading of consignments for export should ensure that sections 1 and 2 of the Journey log are completed correctly and that such non-compliances are kept at a minimum.	These non-compliances were followed up with the transporter as described above. Also please see "Ongoing action plan/actions taken to address transport non-compliances" part (b) below for further action taken by DAFF in relation to this type of non-conformance.
One journey log available for 2 consignments with different destinations.	1	The requirement for a separate journey log for each consignment with different destinations is open to interpretation from a legislative point of view. However Ireland has since implemented this requirement and the transporter in this case was informed of this requirement in writing.	The manual described in "Ongoing action plan/actions taken to address transport non-compliances" below was updated in June 2010 to take into account a number of issues including the requirement to have a separate journey log for each consignment of animals in any one load with different destinations.

	Journey log not returned within 30 days	1	In general, infringements in relation to the non-return of journey logs in 2009 was dealt with at a local level. However in this case the CCA was asked to write to the transporter involved. A letter issued and the journey log was returned.	In late 2010 a new system was implemented whereby the return of all journey logs within the required 30day period was monitored and recorded on a database at a central location i.e. by DAFF staff at the main port of exit. Staff at this port have regular and frequent contact with transporters/ drivers as they exit the country and therefore it is envisaged that this system will streamline the return of journey logs and ensure they are returned and dealt with within the required 30 day period.
Documentation	Absence of vehicle approval cert	1	All transporters are well aware of the requirement to carry the vehicle approval certificate and a copy of the transporter type 2 authorisation during a long distance journey. All of the transporters involved were reminded of this requirement in writing.	As above such non-compliances are dealt with by writing to the transporter involved and reminding him/her of their obligations regarding ensuring the availability of all required documentation to the relevant authorities at all times during any journey.
	Absence of transporter authorisation	2		
Space allowance	Inadequate space provided	1	Transporters are aware of the requirements in relation to space allowance and non-compliances in this area are very rare.	Currently the loading of all consignments of cattle/sheep/pigs being exported from assembly centres are supervised by a VI. This supervision ensures that in the majority of cases the requirements in relation to space allowances are adhered to as the VI is required to assess the space allocated per animal on the journey log and during the actual loading process.

Vehicles	Absence of satellite navigation system	1	Due to the lack of guidance in relation to the specific requirements of a satellite navigation system some confusion existed in relation to this issue	In November 2010 a letter issued to all transporters informing them of the requirement to have a satellite navigation system in place and setting out a basic specification for such a system. They were also advised to ensure that the system installed could be upgraded should that be required.
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** A total of 6 infringements were recorded for transporters in 2009, some of these included more than one non-compliance all of which are detailed in table 3 above.

Ongoing action plan/actions taken to address transport non-compliances

In addition to specific actions detailed in relation to the non-compliances described above, the CA has taken the following steps to ensure the standard of national and international transport is maintained:

A. National Transport:

1. The 2010 targets for inspecting national transport vehicles were similar to the targets for 2009 in relation to the number of inspections because of the high degree of compliance. However in order to ensure the system was targetting as many non-compliant vehicles as possible a system introduced where by vehicles for inspection were selected based on the risk of non-compliance. This risk assessment was based on the criteria set down below.

- The size of the vehicle
- The age of the vehicle (greater risk associated with older vehicles)
- The origin of the vehicle (i.e. personnel were asked to focus on vehicles not from the local area as these were more likely to have travelled longer distances)
- The type of vehicle (i.e. to ensure jeeps and trailers were properly represented)
- Previous history of non-compliance

This system of risk assessment has been carried forward to 2011 also.

2. A large proportion of national transport vehicles pass through Irish livestock marts. In early 2011 the system for inspecting and supervising livestock marts by technical staff was revised substantially and updated. This revision included an increased emphasis on carrying out vehicle checks at marts including recording data on such vehicles, identifying and following up on any non-compliances and referral to veterinary staff for follow up in the event of significant non-compliance. In order to implement this new inspection system effectively, four training sessions were held for technical staff in early 2011.

3. As mentioned in table 1 above it is the intention to review and update the national transport vehicle inspection form in 2011. This review will be carried out with a view to putting in place a system whereby in the event of a serious non-compliance being identified, AFIT, which is the computer system used to record these inspections, will automatically schedule a re-inspection of the vehicle involved to ensure the non-compliance is followed up and resolved.

A. International transport (including transporter infringements)

1. A manual outlining the standard operating procedures to be followed at all export assembly centres was introduced in March 2010 (Assembly Centre SOP). This manual was circulated to all staff (technical and veterinary) working in export assembly centres and is available on DAFF's intranet site. Its purpose was to standardise procedures in relation to all aspects of assembly centre operation and live animal exports. The manual provides detail and guidance on the key areas set down below.

- Completion of journey logs

- Assessment of proposed journey times, watering and feeding intervals and resting periods
- Requirements regarding the retention of journey logs by transporters and their return to the CA
- Requirements for the authorisation of transporters and training of drivers
- Requirements for the approval of transport vehicles and trailers, including vehicle inspection procedures and forms and guidelines for dealing with vehicle non-compliances
- Stocking density requirements and space allowances including detailed guidelines on recommended stocking densities for commonly used vehicles and trailers for the various species
- Details in required animal health and welfare checks (Fitness for Transport) and loading/unloading procedures
- Health certification.

It is envisaged that by standardising the approach to these key areas the incidence of transport and transporter non-compliances will be reduced to a minimum.

The manual has been updated since it was issued originally and it is envisaged that it will be updated on a regular basis to keep in line with any regulatory and/or policy changes in the area of international transport.

2. In addition to the assembly centre SOP, training sessions were held in all District Veterinary Offices dealing with live animal exports during 2009 and 2010. Some of the issues addressed during these training sessions included

- the importance of proper completion and presentation of journey logs by transporters and assessment of journey logs by DAFF staff and
- the importance of carrying out a comprehensive inspection of the international transport vehicle prior to each transport.

The purpose of this training programme was to reduce the number of infringements reported for example in relation to journey logs completed improperly (see Table 3 above for samples of such non-compliances).

3. DAFF is proposing to carry out a research project within the next 12 months on the area of live animal exports. It is proposed that a sample of consignments will be studied in detail from before the point of export to the point of destination, following the commonly used commercial routes.

The purpose of the project will be two fold:

- to ensure that when the requirements of Regulation 1 of 2005 are adhered to, the welfare of the animals being transported is not significantly adversely affected or if it is to report that this is so and
- to compile and record any recommendations that could or should be implemented by Irish transporters to improve the welfare of the animals being transported and transport practices in general.

It is envisaged that this type of research will aid in improving transport practices and therefore improve the overall level of compliance in this area. The research will be

carried out with the co-operation of commercial transporters who have expressed an interest in becoming involved with the project.