

ANIMAL WELFARE OVERBOARD -CARTAGENA PORT (SPAIN)-

07-09.07.2020

18-20.08.2020

EXTERNAL REPORT



An investigation carried out by:



In collaboration with:



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I. EXECUTIVE SUMMARY

Export of live animals from EU to third countries is growing despite being unethical and against European values. Third countries cannot guarantee animal welfare and standards binding in EU, and moreover, the transport itself is performed with numerous violations exposing animals to unnecessary suffering.

Investigations on sea transport by Animal Welfare Foundation and Tierschutzbund Zürich, performed since 2014, regularly document that animal welfare is at high risk during sea transport and related procedures and that Council Regulation (EC) No 1/2005 is regularly violated by organizers, handlers and competent authorities.

In 2018, the EU Commission conducted investigations¹ in the ports of Rasa (Croatia), Koper (Slovenia) and Cartagena (Spain); in 2019 in Midia (Romania) and in 2020 Sète (France). The results of these investigations largely confirm our observations. Therefore, in order to document the implementation of the regulation (EC) No 1/2005 and to document what measures have been implemented by Spain to correct the problems and violations found during the FVO audit in 2018, a joint team from Animal Welfare Foundation, Tierschutzbund Zürich (AWF|TSB), Animals International (AI) and Welfarm performed two investigations this summer 2020 in port of Cartagena, the largest EU exit point for animals.

This report details our observations and serious infringements of Council Regulation (EC) No. 1/2005 found during sea transport and the related operations during the loading of different livestock carriers from 7 to 10 July 2020 and from 18 to 20 August: ETAB; SARAH M; NABOLSI I; AL FAROUK (HANNOUD-O); FREEDOM and ELBEIK livestock vessels in Port of Cartagena. This report also shows how the problems identified during the Commission's 2018 audit remain unsolved and how the competent authorities of the border exit point in Cartagena mainly fail:

- to ensure appropriate facilities (stables) available in order to keep, feed and water the animals outside the means of transport, where loading or unloading operations last for more than four hours and in order to provide proper time for a thorough individual inspection of animals to the competent authorities;
- to ensure that veterinary services are available at all times for constant monitoring of animal welfare and loading operations;
- to verify the fitness of animals for transport by sea and to take appropriate measures;
- to verify that substandard vessels are not certified in case of deficiencies identified by other Member States;
- to verify the vessels conditions through re-inspections before loading takes place.

Besides animal suffering, sea transport contributes to pollution of the Mediterranean with animal faeces accumulated and discarded during journey and illegally discarded dead bodies, in a manner that is breaching MARPOL Regulations.

Europe needs a complete ban of exports of live animals to third countries by sea, that should be replaced by the trade of carcasses, meat products and genetic material. Before this happens, we call for a strict enforcement of the law currently in force. This report proposes urgent changes that need to be implemented immediately, both locally in Cartagena, and in the whole EU, before the trade is shifted from live animals to carcasses and meat products.

¹ *Audit Reports DG (SANTE) 2017-6109, DG (SANTE) 2017-6110, DG (SANTE) 2018-6447, DG (SANTE) 2018-6449.*

II. INTRODUCTION

Background information

In recent years, the controversial and ethically dubious export of live animals for breeding, fattening and slaughter from the European Union to non-European countries has become a gigantic industry. Consequently, thousands of animals have been sent to the Middle East and Northern Africa to be slaughtered. Spain is now the European leader in the export by sea of live cattle and second exporter of sheep (after Romania), with an increase in sale by 28% in 2019, which is expected to be even higher in 2020. This means that only this summer 346,000 cattle and sheep have been exported from Spain (Tarragona and Cartagena ports) to countries in the Middle East and North Africa (mainly to Lebanon, Libya and Turkey), where there are no laws protecting animals from extreme abuse before and during slaughter. Recently, Spain signed a trade contract with Saudi Arabia, taking advantage of the ethical decision of Australia who banned live sheep exports to the Middle East from June 1 to September 14. Instead of taking example of good practice of a developed country, Spain's decision sends live animals on an even longer journey, it does so in summer when it is impossible to ensure proper welfare of the animals during the transport and arrival at destination. The total number of livestock vessels that departed from the port of Cartagena in years 2015-2019 is shown in the table below, indicating the number of vessels and animals per year²:

Cartagena Port	2015	2016	2017	2018	2019
Number of livestock vessels	100	124	131	119	130
Number of cattle exported	58.572	72.556	79.739	96.884	78.367
Number of sheep exported	521.689	543.796	588.693	480.400	580.125

The standard practice in Cartagena Port is that when a vessel is moored, road vehicles carrying animals are arriving normally in a well-coordinated timeframe. Most of the animals are transported from Spanish stables close to the port. Animals from several EU countries are previously sent to Spain for fattening and then exported to third countries. During the reloading stage, the animals are moved directly from the road vehicle onto the vessel via solid corridors: a short gangway and the final gangway ramp (which belongs to a vessel and each has different construction). The handling of the animals during the unloading from road vehicles is done by the drivers; the handling of the animals in the corridors, gangways and the ramp is done by the port employees³; and the handling on the vessel is only done by crewmembers. In Cartagena Port, there are four main loading points (see ANNEX Map of Cartagena Port).

Since 2014, AWF|TSB teams have been carrying out investigations in the ports of Rasa (Croatia), Koper (Slovenia), Midia (Romania), Tarragona and Cartagena (Spain). We accompanied animals on a ship from Croatia to Egypt. Already in 2017, AWF|TSB published "*Animal welfare overboard, the lack of animal protection during sea transport*" - a dossier summing up a two-year-long investigation and presenting the main problems related to sea transport of live animals. In 2017, the international firm Conte & Giacomini which specialises in EU law, filed an extensive complaint about sea transports with the European Commission on AWF|TSB behalf. In this complaint we asked the EU Commission to initiate infringement proceedings against various member states. In 2018, AWF|TSB published "*Report_20180606-09_Animal welfare overboard_Cartagena Port (ES)*" documenting different problems during main operations related to sea transport in the Port of Cartagena.

² Reply to request from MINISTERIO DE AGRICULTURA, PESCA Y ALIMENTACIÓN on 24/01/2020.

<https://sede.administracion.gob.es/pagSedeFront/servicios/consultaCSV.htm>

³ Agencia Marítima Blazquez is a consignee company in charge of loading and operations related to animals (www.amblazquez.com)

FVO Audits carried out in Spain

Most of our findings regarding sea exports in 2018 were confirmed by audits carried out by the Commission. In April 2020, the European Commission published DG(SANTE) 2019-6835: OVERVIEW REPORT ON WELFARE OF ANIMALS EXPORTED BY SEA, which included incompliances found especially in Spanish ports (FINAL REPORT OF AN AUDIT CARRIED OUT IN SPAIN FROM 26 SEPTEMBER 2018 TO 01 OCTOBER 2018 IN ORDER TO EVALUATE ANIMAL WELFARE DURING TRANSPORT TO NON-EU COUNTRIES)⁴. Among other deficiencies, the auditors found that:

- *“the poor conditions on a livestock vessel which was allowed to load at one of the Spanish ports earlier in 2018 indicates that some pre-loading inspections are insufficient and do not ensure that essential systems for animal welfare are in place”.*
- *“Some corrections to the documented procedures are however necessary, namely: when a journey log is required, the need to identify a transporter for the sea leg of a journey, and a more comprehensive checklist for pre-loading inspections.”*
- *“The absence of adequate facilities in the ports in which to unload and rest the animals might lead to welfare problems, particularly if a delay occurs with the loading of the animals.”*
- *“Although there is some level of assurance that pre-loading controls can ensure that livestock vessels used are suitable to prevent unnecessary pain, distress and suffering to the animals, there is a lack of documentary evidence to demonstrate these controls are properly performed at every pre-loading inspection of a livestock vessel. There is therefore the possibility that animals can be transported in unsuitable livestock vessels with their welfare placed at risk.”*

Therefore, the second aim of investigation carried out by AWF, TSB, AI and Welfarm in summer 2020 was to document what measures have been implemented by Spain to correct the problems and violations found during the FVO audit in 2018 as regards animal welfare during sea transport in port of Cartagena. As will be indicated in the following chapters, the problems identified during the Commission’s 2018 audit remain unsolved by Spanish competent authorities.

Besides the above-mentioned problems, the EU audits also detected flaws in the identification of an organizer responsible for the entire journey. The identification of such a person, responsible for the welfare of the transported animals also during the maritime part of the journey, is required by Art. 5.1; Art. 6.1; Art. 11.1 and Annex III (chapter II, point 3.1) of the Regulation (EC) No. 1/2005 and should be included in transporter’s authorisation. In order to verify whether Spanish authorities solved this particular violation identified by the 2018 audit, on 21 May 2019, AWF requested Spanish competent authorities to provide authorizations of transporters for the maritime part of the journey for several journeys in 2019. On 21 June 2019, Spanish competent authorities sent us a very concerning reply:

Respecto a la autorización del transportista para el tramo marítimo del viaje, hasta la fecha no se ha solicitado esta información porque la figura del transportista del buque no está definida y no se ha contemplado hasta la fecha en ningún Estado miembro de la Unión Europea, de hecho no se contempla en los documentos elaborados por los puntos de contacto nacionales de bienestar en el transporte de los Estados miembros, para aplicar de forma armonizada la normativa. No obstante todos los barcos que han sido autorizados en España disponen de un representante ubicado en España.

⁴ DG(SANTE) 2018-6446

Translation (non-official): *“Regarding the authorization of the transporter for the maritime part of the journey, until today this information has not been requested by officials because the “figure” of the vessel’s transporter is not defined and has not been contemplated until today in any other member state of the European Union, in fact, it is not included in the documents prepared by the national transport contact points in the member states, in order to apply the regulations in a harmonized manner. Nevertheless, all the vessels that have been authorized in Spain, they have always a representative located in Spain”.*

This means that even if there is a representative located in Spain, at the end, none of the exports of live animals by sea from Spain to third countries have any person responsible for animal welfare during the maritime part of the journey. Consequently, from legal perspective, no-one is responsible in case of any incidents or welfare problems that may have occurred during the journey by sea.

III. LIVESTOCK CARRIERS AND LOADING OF THE ANIMALS

In July and August 2020, we spent in total six days in port of Cartagena observing six loadings of four livestock carriers: ETAB (July); SARAH M (July and August); AL FAROUK (HANNOUD-0) (July); FREEDOM (July and August). We observed two other livestock carriers, without being able to see the loading procedure itself: NABOLSI I (July); ELBEIK (July). During our investigation we mainly saw animals with Spanish and French eartags, but animals with eartags from the United Kingdom, the Netherlands and Portugal were seen as well. This chapter documents each of observed loading and livestock carrier.

3.1) ETAB Livestock Carrier

- IMO: 6609779
- Name: ETAB
- MMSI: 616481000
- Flag: Comoros [KM]
- Gross Tonnage: 1809
- Summer DWT: 1225 t
- Length Overall x Breadth Extreme: 74.38 x 11.82 m
- Year Built: 1966 Le Havre (France) by La Société Nouvelle des Ateliers and Chantiers du Havre. Ex cargo converted in 1980.
- Livestock carrier certificate approved by Romania on 23.12.2018.

Detentions and deficiencies⁵: Detained in 1999 in Sète (France) and London (United Kingdom), in 2003 in Trieste (Italy) and Koper (Slovenia), twice in 2004 and in 2005 in Trieste, in 2006 and 2007 in Sète, in 2010 in Agadir (Morocco), in 2012 in Sète again, in 2013 in Koper (Slovenia), in 2014 and 2019 in Tarragona (Spain). In 2020 it was inspected three times: in Cartagena (seven deficiencies found on 14.01.2020); in Sète (seven deficiencies found on 09.03.2020 with a resulting detention); in Tarragona (13 deficiencies found on 10.09.2020) and in Rasa (on 10.12.2020 with a resulting detention). Examples of deficiencies identified: inoperative radio communication equipment, Automatic Identification System (AIS), firefighting equipment; non-payment of wages; labour conditions.

Observations during the loading of ETAB (July)

Day of observation	07.07.2020
Teams observing	Animal Welfare Foundation, Tierschutzbund Zürich, Animals International and Welfarm
Mooring position	ETAB is moored in position 1 (coord.: 37.590221, -0.975214)
Arrival of empty vessel to Cartagena Port	06.07.2020 Time: 13:00
Loading of animals in Cartagena Port	07.07.2020 Time: 12:45-21:21
External maximum temperature in Cartagena Port during loading⁶	07.07.2020 32°C
Observation timeframe	Our team is watching the loading of adult cattle on this vessel from two different observation points from 12:45 until 21:21.
Animal category	Adult cattle

⁵ Inspection Search | Paris MoU

⁶ <https://www.meteoblue.com/>

<p>Loading procedure and handling of the animals</p>	<p>Most of the drivers are working in a relaxed way and manage the animals professionally, but some employees of Agencia Marítima Blazquez are handling them incorrectly, using electric cattle prods too often and without real need. The workers are increasingly impatient with the animals, especially at the end of the day. We saw some animals mounting and some getting scared especially at the entrance to the vessel.</p>
<p>Incidents during the loading</p>	<p>Short summary: A French bull on one of the trucks reloading animals to ETAB is unable to move on his own. For over an hour, the animal is hit and receives electric shocks. Finally, it is dragged by a tractor and sent to a slaughterhouse despite being unfit for transport, and with outside temperature of 34°C.</p> <ul style="list-style-type: none"> • 12:45-12:55: two trucks with bulls park in front of the ETAB livestock vessel. • 12:56: The unloading of the first truck starts (cabin: white SCANIA, licence plate E-3727-CNB; trailer: blue/white MOLAS; transporter: Miguel Suarez E Hijos S.L.). Animals pass through a corridor before entering the vessel. • 13:00: On the first truck a downer bull cannot get up (eartag FR-63 6555-8962). He seems to have hind legs paralyzed (clearly an animal unfit to continue the journey). An employee in a yellow vest gives him multiple and repetitive electric shocks to force him to stand up. The struggling animal after a few minutes finally manages to crawl on the ramp, pulling his body with his front legs, but in the corridor he collapses. He is incapable of moving further. • 13:11: The unloading of the rest of the animals from the same truck goes on, the unfit bull is still lying in the middle of the corridor. • 13:00-14:15: In the corridor, at the foot of the vessel, a dozen of employees, vessel crew and truck drivers kick the animal and use the electric prods trying to move him. For more than one hour they are exerting force on the bull. Despite violence, the animal is not able to move. • 13:45: A man in a yellow vest violently kicks the animal dozens of times for no reason. Others look at him without stopping this inappropriate behaviour. • 14:03-14:09: Men attach a rope to the animal to drag him over the ground with a forklift truck back on the truck that had brought him to the port. The animal has been vocalising loud in pain along the whole reloading process (for more than 1 hour). • 14:44: The same truck starts the journey with the downer bull on board and leaves the port area. The animal is clearly unfit for transport and should have been euthanized in the port. Our team follows the truck. • 15:02-15:30: After 24km, the driver parks in car park of Venta Garcerán restaurant (A-30, 170 km, 30320 Fuente Alamo, Murcia). He leaves the animal in the truck, in full sun. Position where the truck parked with the unattended animal: coord. 37.767309, -1.068096. There is no active ventilation nor water on the truck. The suffering animal is abandoned inside the truck, unable to move, moaning and showing clear signs of pain. His rear legs are elongated (abnormal posture for a bovine). According to official meteorological website www.meteoblue.com, the temperature in Fuente-Álamo de Murcia at that time was 34°C. We call Spanish police from SEPRONA MURCIA unit. • 15:33: A patrol car from SEPRONA⁷ arrives. We explain the violations. • 15:35 - 15:50: The officers inspect the documents and the animal and open a report.

⁷ Servicio de Protección de la Naturaleza (SEPRONA). Guardia Civil.

https://www.guardiacivil.es/es/institucional/Conocenos/especialidades/Medio_ambiente/index.html

	<ul style="list-style-type: none"> • 15:50: The truck leaves with the animal on board and takes the A-30 motorway in the direction of Murcia slaughterhouse. <p>Bull history (eartag: FR-63 6555-8962):</p> <ul style="list-style-type: none"> - Born on 20 February 2019 at farm of Jean-Claude Provencher, 1 rue de Chignore, 63930 Augerolles, France; - on 25 September 2019 transported to Astoul Gerard, 82160 Puylagarde, France; sold in Saint Christo market «marché au cadran», 71800 La Chapelle-sous-Dun, France ; - On 26 September 2019 transported by road to Ganados Venta Ceferino SCOOP, Almendricos, 30893 lorca (Spain) - On 07 July 2020 transported to port of Cartagena on a short-distance vehicle.
Departure of the vessel from Cartagena with animals on board	08.07.2020 Time: 09:00
Arrival of the vessel in destination (Bengazi, Libya)	13.07.2020 Libya: a war-torn country where animals are at increased risk due to escalating conflict.
External maximum temperature on arrival (Bengazi, Libya)⁸	13.07.2020 29°C
Extra comments	ETAB had its certificate withheld by Slovenian competent authorities after inspection under Art. 19 during the FVO audit in 2018⁹ . This livestock vessel had many deficiencies not solved for a long time, it was in a generally poor state of repair with many corroded and injurious fittings and lacking several essential systems. Still, in 2017, it was allowed to load animals in Slovenian port. At that time ETAB was approved by France. Upon notification of serious infringements received from Slovenian competent authorities, France withdrew the vessel's authorization in April 2018. On 23.12.2018 ETAB was approved again, this time by Romania. This is a clear example of insufficient communication between Member States and deficient standardization during the approval of vessels.
Photographic evidence	See ANNEX Photo evidence of loading of <i>ETAB</i> , 07.07.2020

⁸ <https://www.meteoblue.com/>

⁹ DG(SANTE) 2018-6449

3.2) SARAH M Livestock Carrier

- IMO: 7808463
- Name: SARAH (ex-Sarah, ex-Nordkyn)
- MMSI: 352548000
- Call Sign: 3EUW8
- Flag: Panama [PA]
- Gross Tonnage: 2950
- Summer DWT: 1600 t
- Length Overall x Breadth Extreme: 77 x 14 m
- Year Built: 1979 in Fevag (Norway) by Fosen MV. Owned by DMS Line SA (Lebanon). Ex reefer converted in 2014. Classification society Polish Register of Shipping
- Livestock carrier certificate approval by Romania on 22.05.2019

Detentions and deficiencies¹⁰: Detained in 2003 in Ijmuiden (Netherlands) and in 2019 in Piraeus (Greece), mainly for problems related to Safety of Navigation and Labour conditions (health protection, medical care, social security).

Observations during the loading of SARAH M (July)

Day of observation	07.07.2020
Teams observing	Animal Welfare Foundation, Tierschutzbund Zürich, Animals International and Welfarm
Moored position	SARAH M is moored in position 4 (coord.: 37.594735, -0.974512)
Arrival of empty vessel at Cartagena Port (Spain)	07.07.2020 Time: 02:40
Loading of the animals in Cartagena Port (Spain)	07.07.2020 Time: 13:53-21:42
External maximum temperature at Cartagena Port (Spain) during the loading	07.07.2020 32°C
Observation timeframe	Our team is observing part of the loading of sheep on this vessel from two different observation points in different moments of the day (from 09:53-10:19; 13:53-14:24; 16:39-17:45; 21:29-21:42). We watch the animals on final gangway (owned by the Port) and on the ramp of the vessel used during the loading (the ramp is always removable and belongs to the vessel).
Animal category	Adult sheep
Loading procedure and handling of the animals	We observe some port employees handling the sheep incorrectly, using electric cattle prods forbidden by the Regulation for the use on sheep. We see that crew members are working in a relaxed way and handling the animals adequately. However, the unloading from the trucks and loading of the animals on the vessel, coordinated by port employees, is done too fast and in a rush: big groups of sheep are forced to run from the truck into the vessel. It is impossible for official veterinarians to find and isolate any unfit animals with such huge groups of animals and speed of loading.

¹⁰ Inspection Search | Paris MoU

Incidents during the loading	As a result of loading of huge groups of animals at the same time, we often see animals getting stuck at the final gangway, piling on top of each other and/or trying to escape into different directions . This poses a high risk of animals getting injured and dying suffocated. This year we see yet another time that some vehicles with animals on board are parked and wait for very long time in areas not prepared for the animals (e.g., parking lot of Bar-Restaurant El Gato 2 outside the port, Coord. 37.595159, -0.968428).
Departure of the vessel with animals on board (from Cartagena)	08.07.2020 Time: 03:00
Arrival of the vessel in destination (Khoms, Libya)	12.07.2020 Time: 15:00 Libya: a war-torn country where animals are at increased risk due to escalating conflict.
External maximum temperature on arrival (Khoms, Libya)	31°C, RH 100% at nights
Extra comments	Note: we observed the loading of this vessel on 18.08.2020 in Cartagena, violations were documented. See below.
Photographic evidence	See ANNEX Photo evidence of loading of SARAH M, 07.07.2020

Observations during the loading of SARAH M (August)

Day of observation	18.08.2020
Teams observing	Animal Welfare Foundation and Tierschutzbund Zürich
Moored position	SARAH M is moored in position 1 (coord.: 37.590125, -0.975269) next to livestock vessel FREEDOM.
Arrival of empty vessel at Cartagena Port (Spain)	17.08.2020 Time: 14:28
Loading of the animals in Cartagena Port (Spain)	18.08.2020 Time: 11:48-19:40
External maximum temperature at Cartagena Port (Spain) during the loading¹¹	18.08.2020 31°C
Observation timeframe	Our team is observing the whole loading of sheep on this vessel from one observation point (from 11:48-19:40).
Animal category	Adult sheep
Loading procedure and handling of the animals	The unloading from the vehicles and loading on the ramps is hectic and chaotic . Unskilled employees of Agencia Marítima Blazquez are handling the sheep incorrectly and with unnecessary violence . They lift and/or drag the animals by their heads, ears, legs, tail or fleece , a practice forbidden by the Regulation and causing unnecessary pain and suffering. Due to this inappropriate handling, the loading becomes difficult. The same routine and its effects are seen the entire day: scared and disoriented animals with high stress levels, going in opposite directions in the corridors, returning from the ramp to trucks , etc. Similarly,

¹¹ <https://www.meteoblue.com/>

	<p>inappropriate handling is demonstrated by most of Sarah M crew members who operate in the area of the vessel's ramp. We even see several cases of crew members kicking and jumping on top of the animals, using extreme violence to hit the animals. The truck drivers work in a more relaxed way, but some of them handle the animals in a stressful way and are getting increasingly impatient with the animals as time goes by.</p> <p>We observe that often the ramps from the trucks are too steep (angle exceeding 26°34'), failing to ensure that animals walk down without risk of injury or difficulties. We see many animals falling down constantly.</p> <p>As a result of loading huge groups of animals at the same time, we often see animals getting stuck at the final gangway, piling on top of each other and/or trying to escape in different directions. This poses a high risk of animals getting injured and dying suffocated.</p> <p>The unloading from the trucks and loading of the animals on the vessel, coordinated by port employees, is done too fast and in a rush: big groups of sheep are forced to run from the truck into the vessel. It is impossible for official veterinarians to find and detect and isolate any unfit animals with such huge groups of animals and speed of loading.</p>
<p>Incidents during the loading</p>	<p>Just 10 minutes after we started the observation, we see the first of six sheep escaping during the unloading from several trucks (between 12:00 and 13:30). The stressed animals run around in the port, after some time two employees of Agencia Marítima Blazquez manage to catch five animals, working under stress and getting increasingly frustrated with the animals. After five animals are caught, the loading of the vessel continues, and the workers do not realize that one sheep is still missing. Our team suddenly see that the missing sheep is now swimming in the sea. We are filming the animal and observing closely what people in charge of the loading are doing. After almost 30 minutes we realize that no one is aware of the situation, therefore our team decides to call port authorities and indicate where the animal can be found. Finally, we see that a port boat (boat name: PULGUI DOS CARTAGENA) goes towards the animal and the workers manage to catch him from the water. Clearly, without our team's intervention the animal would have drowned, and no-one would have noticed. After the animal is rescued, surprisingly it is put by the workers into the final gangway and loaded directly on the vessel. After swimming in the sea for more than half an hour, the animal should have been isolated and inspected by an official veterinarian whether it is fit to continue the 12-day-long journey by sea to Saudi Arabia. Again, this fact confirms the insufficient supervision of fitness of animals for long-distance transport by veterinary authorities in charge. Note: during the observation of loading of another vessel only one month earlier, our team also saw animals escaping, so this seems to be a repetitive problem during the loading of sheep.</p> <p>Moreover, from 18:26 to 20:40 we observe 2 trucks loaded with sheep waiting outside the port in front of Bar-Restaurant El Gato 2 (coord.: 37.595159, -0.968428). Finally, the two trucks leave Cartagena without unloading the animals. This means that the animals were unnecessarily transported to the port, causing them unnecessary stress and fear. At the</p>

	<p>same time, another truck (Lic. plate: (ES) 6411DDP), that already unloaded its sheep inside the port, suddenly loads some animals again (the animals had already been loaded on the vessel). Clearly, the competent authorities did not properly calculate in advance the loading density of the vessel, and due to overloading they needed to correct the mistake, causing extra suffering and stress to many animals. This is yet another confirmation of insufficient supervision and inadequate preparation of the journeys by the veterinary authorities in charge. Our team cannot ascertain if the paperwork needed to re-import these animals was done properly and in accordance with the current sanitary regulation on live animals' importation. Another question is whether the returned sheep were properly identified.</p> <p>At the end of the day, we see sheep on the vessel not only inside the pens, but also in some corridors of the pens (due to improper loading or escaping animals). This means that they were loaded in area not approved for the animals, which is against the Regulation. Transporting animals outside the pens, is too dangerous and severely compromises animal welfare. The departure of a vessel with such loading conditions should never be approved by competent authorities. Furthermore, it is very possible that with animals loaded in corridors the vessel was overloaded.</p>
Departure of the vessel with animals on board (from Cartagena)	19.08.2020 Time: 00:40
Arrival of the vessel in destination (Jeddah, Saudi Arabia)	30.08.2020 Time: 07:17
External maximum temperature on arrival (Jeddah, Saudi Arabia)¹²	40°C
Extra comments	Spain has just signed a new trade agreement with Saudi Arabia, taking advantage of the move of the Australian Federal Department of Agriculture, Water and the Environment that banned live sheep exports from Australia to the Middle East from June 1 to September 14 ¹³ .
Photographic evidence	See ANNEX Photo evidence of loading of SARAH M, 18.08.2020

Extra comment regarding SARAH M, loading July and August 2020:

Before we sent our complaints to Spanish authorities in 2018, all trucks used to park in front of Bar-Restaurant El Gato 2 (coord.: 37.595159, -0.968428) and the animals on board of the trucks waited for hours in the sun until loading of the vessel started, while the drivers waited inside the bar. When loading time came, the drivers would receive a call from the consignee and enter the Port. This practice seems to have finally changed and now the trucks enter the port directly. Still, during six days of our 2020 investigation, we yet again documented some trucks waiting for several hours on a parking lot with animals on board during the loading of Sarah M in July and again in August.

¹² <https://www.meteoblue.com/>

¹³ <https://www.eurogroupforanimals.org/news/australia-bans-live-sheep-exports-middle-east-june-1-september-14>

3.3) FREEDOM Livestock Carrier

- IMO: 7104972
- MMSI: 450421000
- Name: FREEDOM (Ex-Zaher III, ex-Bismillah, ex-Oruda, ex-Bismillah)
- Flag: Lebanon [LB] (Grey List)
- ISM Company: Ania Marine Ltd
- RO: Bureau Veritas
- Gross Tonnage: 1879
- Summer DWT: 2794 t
- Length Overall x Breadth Extreme: 86.99 x 15.02 m
- Year Built: 1971 in Ulstein (Norway) by Ulsteinvik. Ex general cargo carrier, converted in 1998.
- Owned by Ania Marine Ltd (Lebanon)
- **Livestock carrier certificate approval by France (valid until 09.02.2020).** France did not revalidate the certificate approval this year 2020. Our teams could not figure out which Members State issued a new certificate approval. **This should be investigated further by the authorities.**

Detentions and deficiencies¹⁴: Detained in 1999 in Bilbao (Spain), in 2003 in Cork (Ireland) and in 2011 in Cartagena (Spain). Recent inspections of the Freedom with deficiencies reported: 04.01.2019 (Croatia) and 15.02.2018 (Croatia).

Observations during the loading of FREEDOM (July)

Day of observation	09.07.2020
Teams observing	Animal Welfare Foundation, Tierschutzbund Zürich, Animals International and Welfarm
Arrival of empty vessel at Cartagena Port (Spain)	08.07.2020 at night
Loading of the animals in Cartagena Port (Spain)	09.07.2020
External maximum temperature at Cartagena Port (Spain) during the loading¹⁵	09.07.2020 29°C, RH ~70%
Observation timeframe	Our team is observing part of the loading of adult cattle on this vessel from one observation point (from 18:05-20:40).
Animal category	Adult cattle
Loading procedure and handling of the animals	The unloading from the vehicles and loading onto the ramps is hectic and chaotic. Some employees of Agencia Marítima Blazquez are handling the animals incorrectly . The workers are running around, working under stress and are getting increasingly impatient with the animals . They are using electric cattle prods intensively on almost all the animals. The electrocution becomes a routine especially for one of the young workers, who works next to the ramp and is prodding the animals even when it is counterproductive for the loading process. Examples of inappropriate use of electric prod during the loading of <i>Freedom</i> : when the ramp to the

¹⁴ Inspection Search | Paris MoU

¹⁵ <https://www.meteoblue.com/>

	<p>vessel was totally blocked, and animals could not move forward; electric prods used on sensitive areas of the animals such as their face. Bad handling and bad coordination between workers caused disoriented animals go back and forth between the vessel and trucks.</p> <p>We also see that animals are getting particularly scared at the end of the ramp, because the entrance door to the vessel is too narrow and dark. Extra light should be installed in this vessel to make sure animals are not getting scared and try to go back down the ramp.</p> <p>Inside the Port, the vehicles first wait in a line to get on the scale. Again, on this day of investigation we documented long waiting lines in the scale area, with the animals kept on trucks in the sun, without any shadow. This was caused by the absence of port workers in charge of the scale who disappeared for several hours. It is a proof of unnecessary animal suffering caused by inappropriate coordination between transporters and port managers. After weighing on the scale, the vehicles spend even more hours in the waiting zone before they can finally unload animals (that are reloaded directly on the vessel).</p>
Incidents during the loading	No major incidents, besides the inappropriate handling during the loading and long waiting times explained above.
Departure of the vessel with animals on board (from Cartagena)	10.07.2020 Time: 22:22
Arrival of the vessel in destination (Khoms, Libya)	14.07.2020 Time: 13:00
External maximum temperature on arrival (Khoms, Libya)¹⁶	34°C, RH 100% at nights
Extra comments	The loading of the same vessel in Cartagena was documented by our team also on 06.06.2018. At that time, we documented the same inappropriate handling of animals by workers. We also documented loading of animals unfit for a long-distance transport by sea, e.g., a downer bull that could not get up by himself and four workers tried to move him, continuously applying electric shocks on the weak animal, in order to lift him and redirect him to the loading ramp. Another loading of Freedom was documented on 19.08.2020, see below.
Photographic evidence	See ANNEX Photo evidence of loading of FREEDOM, 09.07.2020

¹⁶ <https://www.meteoblue.com/>

Observations during the loading of FREEDOM (August)

Day of observation	19.08.2020
Teams observing	Animal Welfare Foundation and Tierschutzbund Zürich
Moored position	FREEDOM is moored in position 2 (coord.: 37.591083, -0.974641)
Arrival of empty vessel at Cartagena Port (Spain)	18.08.2020 Time: 05:29
Loading of the animals in Cartagena Port (Spain)	19.08.2020 Time: 10:28-18:08
External maximum temperature at Cartagena Port (Spain) during the loading¹⁷	19.08.2020 34°C
Observation timeframe	Our team is observing part of the loading on this vessel (from 10:28-11:18 and from 17:04-18:08).
Animal category	Cattle (mainly bulls and some young calves)
Loading procedure and handling of the animals	<p>Compared to our teams' previous experience, today the loading is very unusual. The port workers work in a relaxed way and manage the animals professionally, without unnecessary violence, and without excessive use of electric cattle prods, which was their routine before. We even see one of the workers petting an injured animal (a behaviour that our team has never seen previously). Furthermore, we see that today all the workers are wearing masks almost all the time (which was not the case on previous days). Another unusual thing is that we do not see any vessel crew member involved in the procedure of the loading (normally crew members are somehow involved in handling the animals during the process). In the morning in the loading area, we notice people who seem to be official authorities, it looks like they are controlling and inspecting the loading procedure.</p> <p>We also see that animals are getting particularly scared at the end of the ramp, because the entrance door to the vessel is too narrow and dark and some animals getting stuck at the end of the ramp, because of their long horns and do not fit in the narrow ramp.</p>
Incidents during the loading	Between 17:00-18:00 we observe one bull isolated in the corridor; the animal seems to be injured. The animal looks a bit lame with a problem in one of the hind limbs. We observe people who seem to be a competent authority as they are inspecting the injured bull. One hour later the animal is loaded back on a truck (license plate: (ES) 5749 GGR) and declared unfit to continue the journey by sea. The driver of this truck does not look very happy with having to load the animal again, and we see that one of the workers of the port asks him to close the flaps, so that no-one can see the animal when the truck leaves the port. Our team cannot ascertain if this animal is sent to a farm to receive appropriate treatment or to a slaughterhouse. In any case, the unfit animal should not have been transported anywhere, and instead should have been euthanized in the port.
Departure of the vessel with animals on board (from Cartagena)	19.08.2020 Time: 21:16

¹⁷ <https://www.meteoblue.com/>

Arrival of the vessel in destination (Benghazi, Libya)	24.08.2020 Time: 13:39
External maximum temperature on arrival (Benghazi, Libya)¹⁸	24.08.2020 31°C
Extra comments	Even if we are happy to see that the lame animal was declared unfit to continue the journey by sea, our team has some reservations regarding this case. During previous investigations we documented animals more severely injured that were not declared unfit to continue the journey and were treated with violence make them move and get loaded into the vessel. Our team cannot ascertain whether this animal was declared unfit and the loading was performed in a professional way only because of the presence of the people who seemed to be officials. This should be checked by official authorities whether on 19.08.2020 there was an audit or an inspection, which could explain the unusual behaviour of port workers. During the loading of Freedom in Cartagena documented by us on 06.06.2018 and 09.07.2020 we saw several infringements.
Photographic evidence	See ANNEX Photo evidence of loading of FREEDOM, 19.08.2020

¹⁸ <https://www.meteoblue.com/>

3.4) AL FAROUK (HANNOUD-O) Livestock Carrier

- IMO: 8813037
- Name: HANNOUD O (written name: AL FAROUK) (ex-Sahiwal Express, ex-Lis E, ex-Elisabeth, ex-Elsborg, ex-Elisabeth).
- MMSI: 667001840
- Flag: Sierra Leone [SL] (Blacklist)
- ISM Company: Altair Shipping & Trading Corp (Low/very low performing)
- RO: Dromon Bureau of Shipping (Medium performing)
- Classification society Dromon Bureau of Shipping
- Gross Tonnage: 2725
- Summer DWT: 2177 t
- Length Overall x Breadth Extreme: 91.5 x 16.2 m
- Year Built: 1990 in Frederikshavn (Denmark) by Orskov Christensens. Ex roulier, converted in 1999
- Owned by Dynamic for Shipping Offshore c/o Altair Shipping & Trading Corp (Greece)
- Livestock carrier certificate approval by Spain on 05.02.2019.
- Number of decks: 6

Detentions and deficiencies¹⁹: Detained in 2003 in Freemantle (Australia) and in 2013 in Portland (Australia). Recent inspections of the vessel under the old name of HANNOUD-O regularly reported deficiencies: 11.08.2020 (Greece); 16.07.2019 (Greece); 16.01.2019 (France); 21.07.2018 (Greece); 09.01.2018 (France).

Observations during the loading of AL FAROUK (July)

Day of observation	08.07.2020
Teams observing	Animal Welfare Foundation, Tierschutzbund Zürich, Animals International and Welfarm
Moored position	AL FAROUK (HANNOUD-O) is moored in position 2 (coord.: 37.591083, - 0.974641)
Arrival of empty vessel at Cartagena Port (Spain)	08.07.2020 Time: 08:00
Loading of the animals in Cartagena Port (Spain)	08.07.2020 Time: 10:14-unknown
External maximum temperature at Cartagena Port (Spain) during the loading²⁰	08.07.2020 32°C
Observation timeframe	In the morning our team is observing part of the loading of adult cattle and some sheep. In the afternoon – part of the loading of the sheep from two observation points (from 09:22-16:00).
Animal category	Adult cattle loaded on bottom decks and sheep on top decks.
Loading procedure and handling of the animals	In the morning, sheep are loaded in four upper decks. Next, until afternoon, adult bulls are loaded. The cattle are loaded in two bottom decks without open windows. During the loading of bulls, some people involved seem to be official veterinarians or persons in charge of the loading procedure. The handling of bulls is quite relaxed and

¹⁹ Inspection Search | Paris MoU

²⁰ <https://www.meteoblue.com/>

	<p>professional, the electric prods are not used inappropriately or too frequently, contrary to what was the case in all previous loadings of bulls in Cartagena port documented by our team.</p> <p>Even if today loading of bulls seems to be under control (only one incident, see below), the loading of sheep is totally different. Too often we see port employees (orange vest) dragging the animals by the fleece – a forbidden practice. Crew members working on the ramp of the vessel very frequently strike the animals with sticks.</p> <p>Due to huge volume of sheep loaded at the same time, we often see that animals are getting stuck on the final gangway and at the first part of the corridor, getting on top of each other and trying to escape into different directions. This is a high risk of animals dying suffocated or getting injured.</p> <p>The unloading from the trucks and loading of the animals into the vessel, coordinated by port employees, is done too fast and in a rush: big groups of sheep are forced to run from the truck into the vessel, which makes it impossible to identify and isolate potentially unfit animals. Furthermore, we suspect that only more valuable animals are sometimes checked by competent authorities in the port, and no-one is controlling the fitness of sheep due to their lower value.</p> <p>We observe that often the ramps from the trucks are too steep (angle exceeding 26°34'), failing to ensure that animals walk down without risk of injury or difficulties. We see many animals falling down constantly.</p>
<p>Incidents during the loading</p>	<p>From 10:15-11:30 we observe several persons gathering around a bull. The bull gets isolated in one of the corridors. After some time, we see that some workers several times splash a liquid over the animal. After that the animal is loaded again into one of the trucks. The animal was probably unfit to continue the journey. If this was the case, the animal should have been euthanized in the port.</p> <p>At the end of the day, we see sheep on the vessel not only inside the pens, but also in lateral corridors of the pens (due to improper loading or escaping animals). This means that they were in area not approved for the animals, which is against the Regulation. Transporting animals in lateral corridors, especially in a vessel like ALFAROUK with huge open windows, is too dangerous and severely compromises animal welfare. During the journey by sea the animals in lateral corridors are exposed to adverse weather conditions (splashing seawater), lack of shade, strong wind, difficult access to water or food, and can even very easily fall into water without any crew member noticing. The departure of a vessel with such loading conditions should never be approved by competent authorities. Furthermore, it is very possible that with animals loaded in lateral corridors the vessel was overloaded.</p> <p>In the afternoon again we see a sheep escaping during loading. The stressed animal is running around the port, several employees are running behind the animal. This incident is yet another proof that prevention of animals falling or escaping during loading and unloading operations does not exist in Cartagena port.</p>

Departure of the vessel with animals on board (from Cartagena)	09.07.2020 Time: 08:58
Arrival of the vessel in destination (Misrata, Libya)	13-14.07.2020
External maximum temperature on arrival (Misrata, Libya)²¹	13-14.07.2020 31-33°C
Extra comments	<p>According to the official reply AWF got from Spanish authorities²² on 24.08.2020, AL FAROUK (HANNOUD-O) was approved by competent authorities in the port of Tarragona (ES). According to the information received, this livestock carrier has six decks appropriate for transport of animals. Concerningly, the certificate of approval was issued after only 4.30 hours of inspection. We have serious doubts whether all the pens and facilities (ventilation, watering, etc.) on such a huge livestock vessel can be thoroughly and professionally inspected in such a short time and by very few officials (inspection on 01.02.2019 done by 2 official vets and 2 livestock controllers in 3.5 hours, and on 05.02.2019 by 1 official vet in only 1 hour).</p> <p>Concerningly, our documentation shows that potentially unfit bulls get isolated and inspected by veterinarians only when first trucks are unloaded and with extra people working in the inspecting area. When unloading is performed by Agencia Marítima Blazquez employees solely, animals are not isolated or identified as unfit. Based on our experience we conclude that without a proper inspection by an independent veterinarian, unfit animals are loaded on the vessels based on industry-driven-compromises.</p>
Photographic evidence	See ANNEX Photo evidence of loading of AL FAROUK (HANNOUD-O), 08.07.2020

²¹ <https://www.meteoblue.com/>

²² Information provided by Generalitat de Catalunya Departament d'Agricultura, Ramaderia, Pesca i Alimentació.

3.5) NABOLSI / Livestock Carrier

- IMO: 7128760
- MMSI: 357933000
- Name: NABOLSI I: ex-Norvantes, ex-Aruna, ex-Waalmond, ex-Svendborg Globe, ex-Else Th, ex-Oceania, ex-Moss Maroc, ex-Oceania)
- Flag: Panama [PA]
- ISM Company: RJA Group SA (Low/very low performing)
- RO: Phoenix Register of Shipping (Medium performing)
- Gross Tonnage: 1259
- Summer DWT: 1405 t
- Length Overall x Breadth Extreme: 75.42 x 12.93 m
- Year Built: **1972** in Svendborg (Denmark) by Svendborg Skibs. Ex general cargo carrier, converted in 1996.
- Owned by RJA Group SA (Greece)
- Livestock carrier certificate approval by Spain on 03.04.2017.
- Number of decks: 4

Detentions and deficiencies²³: Detained in 2007 in Fremantle (Australia) and in 2012 in Izmir (Turkey). Inspections of the Nabolsi I regularly find deficiencies: on 09.05.2018 4 deficiencies were found in Greece (Piraeus, no detention), and on 02.07.2019 12 deficiencies were found in Greece (Lavrion/Laurium, no detention).

Observations of NABOLSI I (July)

Day of observation	08.07.2020- 09.07.2020
Teams observing	Animal Welfare Foundation, Tierschutzbund Zürich, Animals International and Welfarm
Moored position	NABOLSI I is moored in position 3 (coord.: 37.592198, -0.974056)
Arrival of empty vessel at Cartagena Port (Spain)	08.07.2020 Time: 03:20
Loading of the animals in Cartagena Port (Spain)	09.07.2020
External maximum temperature at Cartagena Port (Spain) during the loading²⁴	09.07.2020 29°C, RH ~70%
Observation timeframe	Our team is not able to observe the loading of the animals on 09.07, as we are focussing on the loading of FREEDOM. On 08.07 we see some official cars of inspection team doing an inspection of the vessel.
Animal category	Adult cattle
Departure of the vessel with animals on board (from Cartagena)	09.07.2020 Time: 19:20
Arrival of the vessel in destination (Khoms, Libya)	14.07.2020 Time: 12:00

²³ Inspection Search | Paris MoU

²⁴ <https://www.meteoblue.com/>

External maximum temperature on arrival (Khoms, Libya)²⁵	14.07.2020 34°C, RH 100% at nights
Extra comments	On 08.07.2020 an inspection of this livestock vessel was performed in Cartagena with 10 deficiencies found. Major deficiencies were related to: Certificate & Documentation (Crew Certificates); Structural Conditions; Labour conditions: health and safety, medical care, social security; Accommodation, recreational facilities, food and catering; Heating, air conditioning and ventilation). With so many deficiencies identified, this vessel should not be allowed to load live animals only one day after the inspection.
Photographic evidence	See ANNEX Photo evidence of Nabolsi I, 08-09.07.2020

²⁵ <https://www.meteoblue.com/>

3.6) *ELBEIK* Livestock Carrier

- IMO: 6718427
- Name: ELBEIK
- MMSI: 671002100
- Company: Rana Maritime Services SA (Very low performing)
- RO: International Naval Surveys Bureau (Medium performing)
- Flag: Togo [TG] (Blacklist)
- Gross Tonnage: 2867
- Summer DWT: 1459 t
- Length Overall x Breadth Extreme: 77 x 14 m
- Year Built: **1967**
- Livestock carrier certificate approval by Romania on 14.03.2018.

Detentions and deficiencies²⁶: Inspections of the ELBEIK regularly find several deficiencies: 31.08.2018 (Croatia); 09.04.2019 (Spain); 12.11.2019 (Spain). This year the vessel was detained on 13.01.2020 (Slovenia) mainly due to problems of beams, frames, floors (corrosion); Labour conditions; Safety of Navigation; Water/Weathertightness.

Observations of *ELBEIK* (July)

Days of observation	08.07.2020- 09.07.2020
Teams observing	Animal Welfare Foundation, Tierschutzbund Zürich, Animals International and Welfarm
Moored position	ELBEIK is moored in position 2 (coord.: 37.591083, -0.974641) between FREEDOM and NABOLSI I.
Arrival of empty vessel at Cartagena Port (Spain)	09.07.2020 09:45h (the vessel arrived outside the port on 08.07.2020)
Loading of the animals in Cartagena Port (Spain)	10.07.2020
External maximum temperature at Cartagena Port (Spain) during the loading²⁷	10.07.2020 33°C
Observation timeframe	Our team is not able to observe the loading of the animals on 10.07. On 09.07 we see some cars of the officials performing an inspection of the vessel.
Animal category	Unknown
Departure of the vessel with animals on board (from Cartagena)	10.07.2020 Time: 22:51
Arrival of the vessel in destination (Tripoli, Libya)	14.07.2020 Time: 18:14
External maximum temperature on arrival (Tripoli, Libya)²⁸	14.07.2020 35°C

²⁶ Inspection Search | Paris MoU

²⁷ <https://www.meteoblue.com/>

²⁸ <https://www.meteoblue.com/>

<p>Extra comments</p>	<p>On 09.07.2020 an inspection of this livestock vessel is carried out in Cartagena, with 8 deficiencies found. Main deficiencies were related to: Labour conditions - health and safety, medical care, social security; Propulsion and auxiliary machinery (propulsion main engine not as required); Structural Conditions (steering gear); and Water/Weathertightness which can have a direct impact on the welfare of the animals. With so many deficiencies identified, this vessel should not be allowed to load live animals in Cartagena port only one day after the inspection.</p>
<p>Photographic evidence</p>	<p>See ANNEX Photo evidence of ELBEIK, 09.07.2020</p>

IV. LIVESTOCK VESSELS APPROVED BY SPAIN

EU-Approval of livestock vessels

For animal transportation from the European Union to third countries, vessels need to have an EU approval according to Article 19 of Regulation (EC) No. 1/2005. The approval should guarantee consistent standards for the wellbeing of animals during transport. However, the Member States have different preconditions for the approval of livestock vessels. This is a very technical area that requires different experts inspecting construction and technical details of the vessel and the animal-related design facilities.

In order to promote uniform implementation and application of Regulation (EC) No. 1/2005, the EU Commission introduced in 2014 the so-called “*Network document on livestock vessels*”, and revised it in 2020. The key points of the document are:

- Tasks for the authority authorizing a transporter for sea journey;
- Tasks for the authority approving a livestock vessel;
- Tasks for the authority at the place of departure;
- Tasks for the authority during the loading of a livestock vessel;
- Communication between authorities.

The Network document requires that before approving a vessel, the competent authority must ensure that the operating company is authorised as a transporter. The Network document also recognises that veterinary competency alone is not sufficient to check many of the mechanical systems on a vessel which the welfare of animals is directly related to. The document also recognises that authorities must have access to staff with the necessary knowledge and skills. The diagram below illustrates different aspects of vessel approval that starts with a documentary check before the inspection of the vessel (see Figure 1).

Under Irish standards, the whole approval procedure lasts two to three days. The “*Standard operating procedures for DAFM Staff on the Approval and Operation of Livestock vessels*” of Ireland are the highest standards in the European Union.

Livestock vessels approved by Spanish authorities

Between 2017 and 2020 Spanish authorities approved nine livestock vessels:

No.	Name of vessel	IMO number	Approval fees ²⁹	Port in charge of approval	Time spent on total physical inspection ³⁰	Authorization date	Authorization valid until
1.	BRUNA	7601073	59,95 € + 76,08 €	Cartagena (ES)	4:00	22.10.2018	22.10.2023
2.	NABOLSI I * ³¹	7128760	600 €	Tarragona (ES)	3:45	03.04.2017	03.04.2022
3.	QUEENSLAND	9201702	600 €	Tarragona (ES)	4:00	16.11.2017	16.11.2022
4.	HANNOUD-O *	8813037	600 €	Tarragona (ES)	4:30	05.02.2019	05.02.2024
5.	SPIRIDON II	7311329	600 €	Tarragona (ES)	6:00	09.05.2019	09.06.2019

²⁹ *Cartagena port: tarifas administrativas según el Decreto Legislativo 1/2004, de 9 de julio, que aprueba el Texto Refundido de la Ley de Tasas, Precios Públicos y Contribuciones Especiales y cuya cuantía se encuentra actualizada según la Orden de 29 de mayo de 2020 de la Consejería de Presidencia y Hacienda, por la que se publican las tarifas de las tasas y precios públicos aplicables en el año 2020. Tarragona Port: Orden ARP/65/2020, de 26 de mayo, por la que se da publicidad a las tasas vigentes en el año 2020 que gestiona el Departamento de Agricultura, Ganadería, Pesca y Alimentación.*

³⁰ *Information provided by Generalitat de Catalunya Departament d'Agricultura, Ramaderia, Pesca i Alimentació and Comunidad Autónoma de la Región de Murcia Agua, Agricultura, Ganadería, Pesca Y Medio Ambiente.*

³¹ **Livestock vessels loading animals during the investigation documented in this report.*

			+600 €			20.06.2019	20.06.2024
6.	ANAKIN	7422544	600 €	Tarragona (ES)	12:00	11.06.2019	11.06.2024
7.	SUHA QUEEN II	7406772	600 €	Tarragona (ES)	4:25	26.06.2019	26.06.2024
8.	TULIP	8614273	600 €	Tarragona (ES)	6:00	18.11.2019	18.11.2024
9.	JULIA AK	7434949	600 € +600 €	Tarragona (ES)	5:40	13.12.2019 30.04.2020	13.03.2020 30.04.2025

Table 1. List of livestock vessels approved by Spain. Date 24.08.2020.

Regarding these nine livestock vessels approved by Spain (see Table 1 above), our organizations are particularly concerned with the following facts:

- The youngest livestock vessel on the list is 30 years old, and the oldest one - 48 years old. Seven livestock vessels out of nine are over 40 years old. Note: vessels over 12 years old are automatically categorized with a higher risk level, because of increased risk of mechanical and structural failure;
- All, except one, have been converted from car ferries and cargo ships into livestock vessel to transport animals;
- Only two of the vessels are flagged under the “white-list”, representing the so-called quality flags according to the Memorandum of Paris (Paris MoU)³². Most of the vessels (five) are ranked on the “black-list”, with poor performance and considered to be high or very high risk. Finally, two of the vessels are under flags ranked on the “grey-list” of Paris MoU;
- All vessels, except one, are classified by Classification Societies who are not members of IACS (required by the Irish SOPs) and have presumably low standards.
- The physical inspection of the vessels lasted only between 3 h 45 min and 12 hours in total, which is especially concerning taking into account to the age of vessels. According to experts, the older the vessel the more problems will be found on inspection and the longer the inspection will take. Furthermore, the inspectors have to verify a huge list of welfare-related issues such as passageways, doorways, pens, gaps, sharp edges, ramp angles, the surface of the floor, hospital pens, sufficient height, lightning, firefighting, water, drainage, ventilation and a lot more, sometimes on vessels that have up to seven loading decks and up to 110x17 meters of overall length and width.

During approval of the above-mentioned livestock vessels, the provisions of the EU-Network document were clearly ignored, since vessels from blacklisted flag states (Paris MoU) and vessels classified by Classification Societies not ranked as “high performing” where approved. Furthermore, many of the inspections were done by veterinary experts only, while the Network document requires the support of a marine surveyor to check the technical standards of the vessel.

³² Paris MoU has the mission to eliminate the operation of sub-standard vessels.

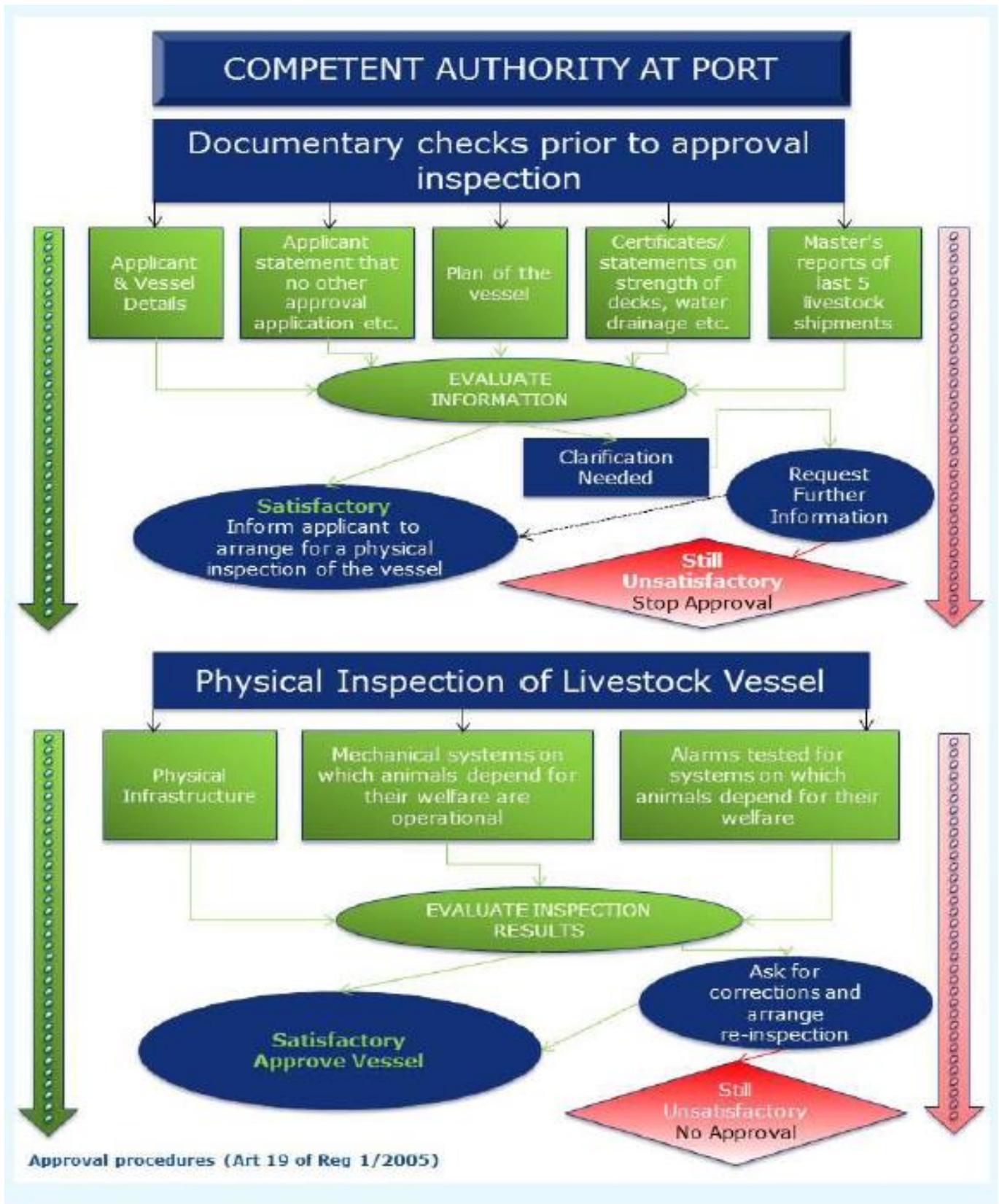


Figure 1. Approval procedures according to Art 19. Source: EU Commission's Network Document, February 2020.

V. VIOLATIONS AND CONCLUSIONS

Since 2014, our teams have been documenting the consequences of long-distance sea transport for European animals. The results of our investigations are disastrous: with all the suffering and infringements documented, animal transports are neither sufficiently controlled, nor violations sanctioned. The problems are systematic and often have fatal consequences for the animals. Moreover, this cruel trade also bears high risk of spreading animal and zoonotic diseases. This trade leaves thousands of animals without veterinary protection before they even start the journey by sea.

With our 2020 investigations of Cartagena -the main European exit port of live animals- teams from Animal Welfare Foundation (AWF), Tierschutzbund Zürich (TSB), Animals International (AI) and Welfarm demonstrated yet again that animals regularly suffer during the long-distance transport, despite the fact that Regulation (EC) No. 1/2005 is in force, and despite the fact that we reported these problems already in 2018. Furthermore, we saw new and even more serious problems affecting severely the welfare of animals. In only six investigation days we identified serious and concerning problems in each of the vessels observed.

The authorities of Cartagena Port³³ regularly fail to comply with the relevant provisions of Regulation (EC) No. 1/2005 that will be mentioned below in connection with Art. 3; Art. 20 and Art. 21:

- **to protect animals from long waiting time.** Even if the most serious problem of long standstill times in the sun seem to have been tackled to a certain extent, still some animals wait unnecessarily (before entering the port and inside the port) due to inappropriate coordination between transporters and port authorities. We yet again documented some trucks waiting for several hours with animals on board on a parking lot in front of a Bar-Restaurant and long waiting lines in the scale area, with the animals kept on trucks in the sun, without any shadow. After our complaints in 2018 the port of Cartagena finally installed some shading inside the Port, however the shadow is available for only 10 vehicles parked at the same time. As a result, animals on other vehicles still suffer long hours of vehicle standstill in the sun. Long waiting time before the loading could be accepted only as an exception, not as a standard, especially during hot weather. **This is a serious breach of Art. 3a, 3f; Art. 5.3a; Art. 20.2 and Art.22 of the Regulation (EC) No. 1/2005.** Furthermore, it is necessary to point out that according to **Annex I (chapter III, points 1,2a)** “appropriate facilities shall be available in order to keep, feed and water the animals outside the means of transport” “Where loading or unloading operations last for more than four hours”.
- **to verify the fitness of animals for transport by sea and to ensure appropriate infrastructure in place allowing to properly inspect and ensure animal welfare.** Our team documented animals that should have been considered unfit for long-distance transport by veterinary authorities but were loaded on the vessel. One of the reasons of this failure are working hours of competent authorities and absence of veterinary officers in the Port during loading. We proved yet again that monitoring of animals does not exist in practice, and Cartagena port veterinary authorities are understaffed. We saw that animals are declared unfit only when an official authority is present. After the loading, official vets should also inspect all pens on the vessel to verify if any unfit animals have been loaded by mistake. In such case, the unfit animal should be emergency slaughtered or euthanized on the vessel. To ensure the constant monitoring of animal welfare, veterinary care should be available at all times. In their official reply to point 11 of FVO audit (DG(SANTE) 2018-6446) of 25 January³⁴, Spanish authorities affirmed that animals are not always checked, as according to them the port personnel have the necessary knowledge to identify if an animal is fit or not. Our investigations in 2018 and 2020 proved yet again that port personnel fail to detect unfit animals and we have shown that still there are no facilities to properly inspect and rest the animals. The presence of an official veterinarian is necessary to inspect all loaded animals according to the regulation, but currently, it is impossible for official veterinarians

³³ PIF: Puerto de Cartagena; Muelle de San Pedro; TI: 96 8981013; Fax: 96 8981012; Email: sanimal.cartagena@seap.minhap.es

³⁴ 2018-6446 - Annex - Comments

to detect and isolate some of the unfit animals with such huge groups of animals and speed of loading, especially in case of sheep. This is also especially difficult if the veterinarian/ inspector can only see one side of the animal. Even though the facilities allow the selection of an unfit animal through doors in the gangway, there is every chance that sick and unfit animals are loaded on to vessels and transported over multiple days to their destination. Had a compulsory 24-hour rest of animals in the Ports' stables been introduced, competent authorities would have more time for a thorough individual inspection of animals and all transport related requirements. **This is a serious breach of Art. 20.2; Art. 21.1c; Art. 15.2; Annex I (chapter I, points 1,2) (chapter III, points 1,2); Art. 25 and 26.1 of the Regulation (EC) No. 1/2005.**

- **to ensure that loading operations are supervised by an authorised veterinarian and are carried out in compliance with Art. 3 of Regulation (EC) No. 1/2005:** *“No person shall transport animals or cause animals to be transported in a way likely to cause injury or undue suffering to them”*. With one exception of officials present, the loading was always performed unprofessionally. The unskilled workers were inappropriately using electric prods, causing chaos, extending the process, scaring the animals and causing unnecessary suffering. We documented the use of electric prods on sheep and on sensitive body parts of cattle (e.g., face), which is a blatant violation of the Regulation, just like the documented violent and repeated kicking of animals that were incapable of moving. Certificates of competence should always have an expiry date to ensure continuous education of persons responsible for animals. Similar certificates should be obligatory for the crew of livestock vessels operating from EU ports. The authorities at Cartagena Port regularly fail to ensure that animals are not dragged by head, ears, legs, tail or fleece, or by mechanical means, or handled in such a way as not to cause them unnecessary pain or suffering. We also have observed the loading of longhorn cattle, who could hardly move through the small gangway constructions. **This is a serious breach of Art. 3 (a-h); Art. 17; Art. 20.2; Art. 21.1c; Annex I (chapter III, points 1.2b, 1.3, 1.4, 1.8); Annex IV (2), of the Regulation (EC) No. 1/2005.**
- **to ensure that animals declared unfit to continue the journey are emergency euthanised on site.** Instead, we documented cases of unfit (and suffering) animals re-loaded back on a truck and transported to a slaughterhouse. Any animal not fit to continue the journey should be euthanized in the port, not only to humanely terminate its suffering and follow the Regulation, but also to apply corrective and dissuasive measures to sanction all infringements related to fitness for transport, in order to avoid future attempts of exporting suffering animals. **This is a serious breach of Art. 3; Art. 5.3 a, b); Art. 8.1; Art. 21.1,3; Art. 20.2; Art. 21.1c; Art. 23.1,2; Art. 25 and 26; Annex I (chapter I, points 1,2,4), (chapter II, points 1.1) of Regulation (EC) No. 1/2005.**
- **to prevent the animals escaping or falling from trucks and/or in water during the loading procedure and to ensure appropriate contingency plans to protect animals from emergency situations such as injured or escaping animals.** In two out of six loadings observed, we saw several such cases. An animal after swimming in the sea for more than half an hour should be isolated from the rest of animals and inspected by an official veterinarian, and not loaded immediately after catching, to continue the 12-day-long journey by sea to Saudi Arabia. This is yet another confirmation of insufficient supervision of fitness of animals for long-distance transport. Based on the number of escape cases during our observation, we suspect that this serious problem is quite frequent in Cartagena port. **This is a serious breach Annex I (chapter II, points 1.d), (chapter III, points 1.3a and 1.4b); Art. 20.2; Art. 21; Art. 25 and Art.26.1 of the Regulation (EC) No. 1/2005.**
- **to ensure the existence of a vessel's transporter authorization for the maritime part of the journey.** The identification of such a person, responsible for the welfare of the transported animals also during the maritime part of the journey is **required by Art. 5.1; Art. 6.1; Art. 11.1; Annex III (chapter II, point 3.1) of the Regulation (EC) No. 1/2005.**
- **to ensure that before approval of any journey all deficiencies found in past months on the vessel in other EU ports are checked.** We noticed that most vessels operating from Cartagena port this summer

have been regularly reported with deficiencies and even detentions for serious infringements in the last years by other Member States³⁵. We are especially concerned by ETAB, AL FAROUK (HANNOUD-O), NABOLSI I and ELBEIK. Sometimes deficiencies were found only days before or after the departure of the vessel from Cartagena (including some cases of detentions), meaning that competent Spanish authorities in charge failed to properly inspect the vessel, **required by Art. 20.1 of the Regulation (EC) No. 1/2005**. Significant number of deficiencies is directly related to and negatively affecting animal welfare, such as problems with ventilation and water system, or corrosion. Thus, pre-loading controls in Cartagena are either inexistent or fail to ensure that livestock vessels are suitable to prevent unnecessary pain, stress and suffering to the animals (e.g., animals seen in the lateral corridors outside the pens of the vessel). Furthermore, this year a French Shipping and Environment NGO called Robin des Bois³⁶ published a report³⁷ targeting 106 ships which it believes should be scrapped for safety reasons. Many of these ships are livestock vessels operating in Europe. On the list of livestock vessels Sarah M, Etab, Nabolsi I, Freedom and Hannoud-O are mentioned, that is 5 out of 6 vessels our teams observed during the investigation.

- **to verify the conditions of transport by road:** fitness of the arriving animals is not supervised neither thoroughly or regularly. **This is a breach of Art. 14; Art. 15; Art. 21; Art. 25 and Art.26.1 of the Regulation (EC) No. 1/2005.**
- **to properly calculate loading densities in advance, to avoid having to unload animals from the vessel.** This is a serious problem from the welfare point of view (adding unnecessary stress to the animals), but also a serious sanitary concern, as such animals are re-imported to an EU territory from a vessel that does not guarantee proper disinfection. **This is a breach of Art. 20.2; Annex I (chapter II point 1.2), (chapter III point 1.9, 2.1) and Annex III (chapter VII) of the Regulation (EC) No. 1/2005.**
- **to ensure that weather conditions along the whole route, including in EU exit port and at destination, are considered before approving the transports.** In six out of eight vessels observed by our teams, animals were loaded on days with temperature in port of Cartagena exceeding 30°C. Seven of these vessels arrived at destination with outside temperature over 30°C. In one case the temperature on the arrival of animals reached even 40°C (Saudi Arabia). **This is a breach of Art. 20.2; Art. 21.1d; Annex I (chapter II points 1.1.b), (chapter VI points 3) and Art. 5.3.a of the Regulation (EC) No. 1/2005.** The FVO report DG(SANTE) 2019-683 also highlights the problem of high temperatures: *“High temperatures are the main cause of animal welfare problems during journeys. Problems arise during hot days during the summer. This is due to the absence of cooling systems in livestock vehicles, which cannot maintain the temperature within the required limits when the days are very hot.”*
- **to ensure the monitoring of transport stages at sea and the condition in which the animals arrive at their place of destination.** According to **Art. 5.3.a, b and Annex II (point 8) of the Regulation (EC) No. 1/2005** competent authorities can request the information to the organizer about the execution of the entire journey (such as the mortality rate, injuries and any other health issues affecting the animal welfare, that might develop during the sea journey). According to the of the Regulation, the journey log must be returned to the competent authority after completion of the journey to the place of departure.
- **to make sure that animals are not transported to countries in the state of civil war, like Libya, where due to the extreme situation there is even less veterinary control than usual, and the welfare of the animals cannot be guaranteed.** The Court of Justice has given considerable weight to the duty in Article 13 TFEU to pay full regard to the welfare requirements of animals when formulating and implementing certain policies, including those on agriculture and transport. Protocol 33, the predecessor of Article

³⁵ <https://www.parismou.org/inspection-search/inspections-results-kpis>

³⁶ [Robin des Bois | Association pour la protection de l'Homme et de l'environnement](https://www.parismou.org/inspection-search/inspections-results-kpis)

³⁷ <https://robindesbois.org/wp-content/uploads/shipbreaking59.pdf>

13, played a significant part in **the Courts of Justice ruling in the Zuchtvieh case (ECJ ruling C-424/13)**³⁸. Furthermore, on 21 April 2020, the UN warned of the rapidly worsening situation in Libya³⁹. Under the legal principle of good faith, the Article 13 ‘full regard duty’ obliges the Spain to take animal welfare into account in a thorough and serious manner in formulating and implementing policies in specified fields.

- to ensure veterinary authorities in charge of this border exit are sufficiently staffed and trained to supervise and check the compliance with the Regulation of the whole operation of loading on a vessel, which should include: the inspection of the vessel itself; the conditions of road transport; journey times; fitness for transport of all individual animals; supervision and control during loading procedures into livestock vessels and to check documentation of hundreds of animals. **This is a breach of Art.16 of the Regulation (EC) No. 1/2005.**
- Besides animal suffering, sea transport contributes to pollution of the Mediterranean with animal faeces accumulated and discarded during journey and illegally discarded dead bodies⁴⁰. **This is a serious breach of Annex IV and Annex V of MARPOL 73/78 regulation.**

³⁸ *Judgment of the Court (Fifth Chamber) of 23 April 2015 (request for a preliminary ruling from the Bayerischer Verwaltungsgerichtshof — Germany) — Zuchtvieh-Export GmbH v Stadt Kempten (Case C-424/13)*

³⁹ [UN in Libya warns of possible war crimes as fighting rages \(apnews.com\)](https://www.apnews.com/story/un-libya-war-crimes-fighting-rages/2020/04/21/20200318)

⁴⁰ 20200318_Letter to EMSA_livestock sea transport_AWF.

VI. REQUESTS

Having demonstrated all the above-mentioned problems, we urge the EU Commission to ban the shipment of live animals to non-EU countries. We need a shift towards the trade of meat, carcasses and genetic material only. We need a complete change in the agricultural policy of the EU. We need to work towards a more respectful agriculture with animals and environment in mind. Furthermore, the high degree of specialization in animal husbandry should be reduced. The export of live animals and their cruel slaughter in third countries are not compatible with current values of the European Union.

As long as the trade continues, the Commission must ensure that it is carried out in compliance with the law in force, including the Courts of Justice ruling in the Zuchtvieh case (ECJ ruling C-424 /13)⁴¹. For this aim we believe it is crucial to:

- Continue the follow-up research on the level of implementation of Regulation (EC) No. 1/2005 during the export of animals to Third Countries from Spanish ports.
- Introduce a regulatory system (as is in operation in Australia) making European exporters legally accountable for ensuring compliance with Regulation (EC) No. 1/2005 and OIE standards.
- Implement strict guidelines for the construction and maintenance of vessels, with minimum requirements based on Marine Order 43 of the Australian Maritime Safety Authority.
- Set detailed rules necessary for the implementation of Regulation (EC) No. 1/2005 according to Art. 30.2) and to make the “Network document on livestock vessels” legally binding.
- Implement procedures to verify the compliance with Regulation (EC) No. 1/2005 after animals leave the EU, as set out in Art. 3 of Council Reg. 817/2010.
- Introduce of the obligation to have a qualified, independent veterinarian accompany the animals during sea transport.
- Introduce a qualified, independent expert team for EU approval of vessels.
- It is evident that despite efforts of the European Commission to constantly remind the Member States that Regulation (EC) No. 1/2005 should be correctly implemented, Member States are not implementing it in a harmonized way, a glaring example being Spanish ports and inappropriate approval of means of transport (livestock vessels).
- Implement bilateral agreements, stipulating animal welfare standards, to ensure that European Welfare Rules are respected outside EU, as decided by the European Parliament (report from February 2019)⁴².

Art. 13 of the Treaty on the Functioning of the EU (TFEU) requires the EU and the Member States to pay full regard to the welfare of animals in the formulation and implementation of agriculture policies. Thus, the EU should develop strategies to replace the export of live animals with a carcass only trade, also to avoid that animals have to undergo horrendous suffering during slaughter in importing countries.

We urge the Spanish Ministry (Ministerio de Agricultura y Pesca, Alimentación y Medio Ambiente) to ban the shipment of live animals to non-EU countries until all serious problems reported by our teams and all problems found during the FVO Audit in 2018 are completely solved. Spain, the leader of fattening, must develop a strategy with effective incentives to gradually eliminate all long-distance transport of live animals and replace it with transport of meat products.

⁴¹ *Judgment of the Court (Fifth Chamber) of 23 April 2015 (request for a preliminary ruling from the Bayerischer Verwaltungsgerichtshof — Germany) — Zuchtvieh-Export GmbH v Stadt Kempten (Case C-424/13)*

⁴² https://www.europarl.europa.eu/doceo/document/AGRI-PR-630436_EN.pdf?redirect

We request the competent authorities from Cartagena port to take necessary steps needed to:

- **urgently address and solve all the deficiencies found during the FVO audit in port of Cartagena in 2018.**
- **ensure that veterinary services are available at all times for constant monitoring of animal welfare as required by the Regulation (Art.20; Art. 21).**
- **ensure that appropriate facilities (stables) are available in order to keep, feed and water the animals outside the means of transport, where loading or unloading operations last for more than four hours (Annex I, chapter III, 1.2) and to ensure that competent authorities have proper time for a thorough individual inspection of animals.**
- **ensure that the transporter is authorized for the journey by sea.** Our investigations exposed that, in fact, there are no authorized transporters for sea transport (Art. 5(1)).
- **ensure a qualified and independent expert team during the approval of vessels** (consisting at least of a marine surveyor, a marine technician, and a veterinarian) (Art. 26.6).
- **guarantee implementation of the Network document** regarding live animal transports and to not approve any consignments to Third Countries whenever animal welfare cannot be assured.
- **introduce mandatory reporting of illnesses, injuries and deaths** on vessels, during unloading from vessels and onward transportation to the final destination.
- **ensure that existing contingency plans are analysed and revised.** Port of Cartagena is clearly missing contingency plans for cases of escaping, injured or unfit animals.
- **require/organise proper training of personnel handling animals** during their loading on vessels, like one already required for the certificate of competence for drivers and attendants (Art. 17).
- **ensure that animals declared unfit to continue the journey are emergency euthanised on site** instead of being transported to a slaughterhouse.
- **ensure that all competent authorities verify the temperature on the whole route, and not approve any transport if the outside maximum temperature expected at the port of origin or port of destination is higher than 30°C.** Ensure that the «National Summer Temperature Action Plan»⁴³ applies to all transports, also by sea. Ensure that in summer animals are not transported to countries such as Saudi Arabia, especially in the light of other exporting countries banning the exports, as welfare of animals cannot be guaranteed at the arrival due to high temperatures (more than 40°C usually).
- **ensure that livestock vessels are not overloaded** and that density calculations are done well in advance.
- **officially request for more official veterinarians in the PIF control at port of Cartagena.** Right now, Cartagena is the busiest port in Europe, and due to the huge volume of vessels loaded every week it is crucial to have several official veterinarians inspecting all the animals.
- **ban the exports of live animals to countries in the state of civil war**, like Libya, a country where due to the extreme situation there is even less veterinary control than usual, and welfare of animals cannot be guaranteed.
- **take necessary actions against organizers, transporters, consigners, Port employees and official veterinarians responsible for consignments described in this report**, for violations of Regulation (EC) No. 1/2005 and the suffering caused to animals mentioned in this report.

⁴³ PLAN DE ACTUACIONES SOBRE EL CONTROL DE LA TEMPERATURA EN LOS VIAJES LARGOS POR CARRETERA. VERANO 2020

ANNEX: Photo evidence of investigations

I. Photo evidence of loading of ETAB, 07.07.2020



Figure 2. ETAB with food and straw for animals on the deck. Cartagena, 07.07.2020.

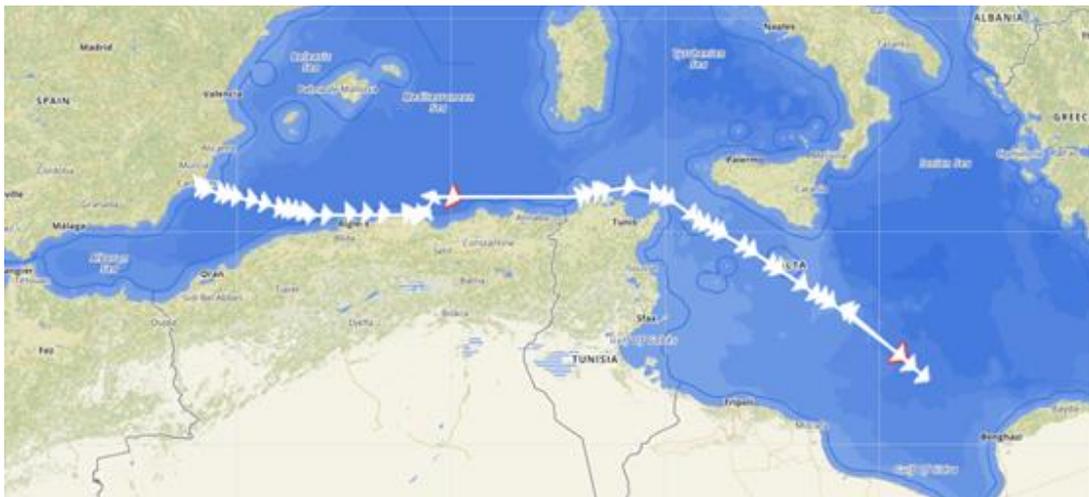


Figure 3. The whole 6-day-long journey by sea from Cartagena to Libya of ETAB loaded with European animals. Mediterranean Sea, 08.07-13.07.2020⁴⁴.



Figure 4. On the first truck a downer bull cannot get up (eartag FR-63 6555-8962). He seems to have paralyzed hind legs (clearly an animal unfit to continue the journey), 07.07.2020.



Figure 5. An employee in yellow vest gives him multiple and repetitive electric shocks to force him to stand up, 07.07.2020.

⁴⁴ Source: Vesseltracker.com



Figure 6. The struggling animal after a few minutes manages to crawl on the ramp, pulling his body with his front legs, 07.07.2020.



Figure 7. A man in yellow vest violently kicks the animal dozens of times for no reason (other people look at him without stopping this inappropriate behaviour), 07.07.2020.



Figure 8. Men attach a rope to the animal to drag him over ground with a forklift truck, 07.07.2020.



Figure 9. Then, they move the animal into truck that brought him to the port. The animal is screaming in pain along the process (for more than 1 hour), 07.07.2020.



Figure 10. After 24km, driver parks in a restaurant parking. He leaves the animal in the truck, in full sun. The suffering animal is unable to move. He moans and shows clear signs of pain. His rear legs are elongated (abnormal posture for a bovine), 07.07.2020.



Figure 11. A SEPRONA⁴⁵ (Guardia Civil) patrol arrives. The officers inspect documents and the animal, and open a report, 07.07.2020.

Note: More photographic evidence of loading of ETAB available on request. Footage by Animal Welfare Foundation, Tierschutzbund Zürich, Animals International and Welfarm.

⁴⁵ Servicio de Protección de la Naturaleza (SEPRONA). Guardia Civil.

https://www.guardiacivil.es/es/institucional/Conocenos/especialidades/Medio_ambiente/index.html

II. Photo evidence of loading of SARAH M, 07.07.2020



Figure 12. SARAH M with food and straw for the animals on the deck. Cartagena, 07.07.2020.

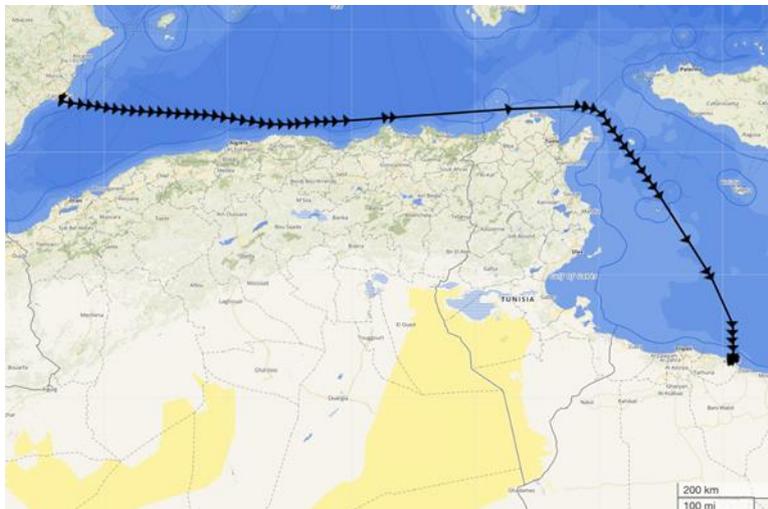


Figure 13. The whole 5-day-long journey by sea from Cartagena to Libya of Sarah M loaded with European animals. Mediterranean Sea, 08.07-12.07.2020⁴⁶.



Figure 14. Trucks transporting sheep to be loaded on Sarah M, 07.07.2020.



Figure 15. Inside the trucks: Spanish sheep that will be loaded on Sarah M, 07.07.2020.

⁴⁶ Source: Vesseltracker.com



Figure 16. Some port employees handle the sheep incorrectly, using electric cattle prods (forbidden for handling sheep), 07.07.2020.



Figure 17. We see many animals getting stuck at the final ramp, animals on top of each other, trying to escape in different directions, 07.07.2020.



Figure 18. Some crew members in the afternoon working in a relaxed way and handling the animals adequately, 07.07.2020.



Figure 19. Loading sheep from trucks on livestock carrier Sarah M, 07.07.2020.



Figure 20. Yet again we documented trucks waiting for several hours with animals on board in a parking lot outside the port, 07.07.2020.



Figure 21. Animals with heat stress symptoms inside a truck left for several hours in parking lot outside the port. External temperature: 32°C, 07.07.2020.

Note: More photographic evidence of loading of SARAH M available on request. Footage by Animal Welfare Foundation, Tierschutzbund Zürich, Animals International and Welfarm.

III. Photo evidence of loading of SARAH M, 18.08.2020



Figure 22. SARAH M with food and straw for animals on the deck. Cartagena, 18.08.2020.



Figure 23. The whole 12-day-long journey by sea from Cartagena to Saudi Arabia of Sarah M loaded with European animals. Mediterranean Sea, 19.08-30.08.2020⁴⁷.



Figure 24. Procedure of reloading animals from trucks to Sarah-M. Several animals falling down from the ramp and escaping, 18.08.2020.

⁴⁷ Source: MarineTraffic.com



Figure 25. More stressed animals escaping and running around the port. Unskilled employee handling the sheep incorrectly (dragging by tail), 18.08.2020.



Figure 26. Another animal escaping from loading area. Unskilled employee handling the sheep incorrectly, 18.08.2020.



Figure 27. Truck driver handling the animals in a way causing stress, and getting increasingly impatient with animals, 18.08.2020.



Figure 28. Driver violently kicking animals during unloading, 18.08.2020.



Figure 29. Unskilled employee of Agencia Marítima Blazquez holding a stressed sheep by its ears, 18.08.2020.

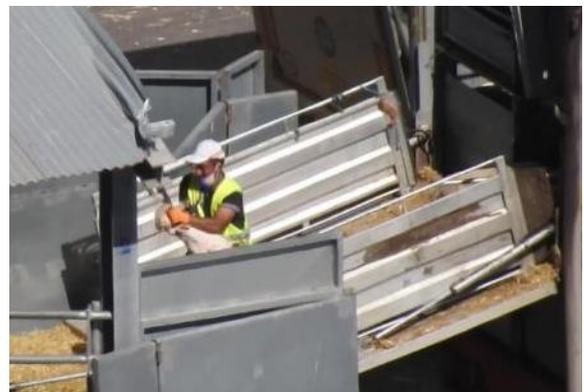


Figure 30. Unskilled employee of Agencia Marítima Blazquez violently lifting a sheep by its head, 18.08.2020.



Figure 31. Unskilled employee of Agencia Marítima Blazquez lifting a sheep by its head with extreme violence, 18.08.2020.



Figure 32. Very often animals get their legs trapped and thus get stuck in gangway, 18.08.2020.



Figure 33. A crew member kicking and jumping on top of animals, using extreme violence, and hitting animals with sticks, 18.08.2020.



Figure 34. Animals getting stuck at final gangway, piling on top of each other and/or trying to escape in different directions, some legs trapped in lateral fences, 18.08.2020.



Figure 35. From 18:26 to 20:40 we observe 2 trucks loaded with sheep waiting outside the port in front of El Gato 2. Finally, the trucks leave Cartagena without unloading the animals, 18.08.2020.

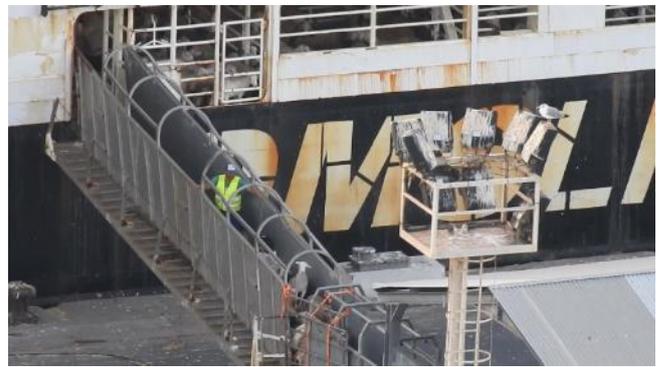


Figure 36. Some sheep get unloaded from the vessel (the animals had been loaded there earlier this day) and are re-loaded back on truck (Lic plate: (ES) 6411DDP), 18.08.2020.



Figure 37. Sheep re-loaded from vessel back to truck. Competent authorities did not properly calculate the loading density of vessel, causing extra suffering and stress to many animals, 18.08.2020.



Figure 38. Truck (Lic. plate: (ES) 6411DDP) with animals on first deck leaves the port of Cartagena and goes in direction of Murcia, 18.08.2020.



Figure 39. Sheep loaded not only in pens, but also in corridors. This means that animals are loaded in areas not approved for animals, 18.08.2020.



Figure 40. Most pens and corridors are overcrowded. It is very possible that the vessel is overloaded, 18.08.2020.



Figure 41. Escaping animal, running towards water (open space between the vessel and port), 18.08.2020.



Figure 42. A sheep swimming far in the sea. Port employees are not aware of the situation, 18.08.2020.



Figure 43. The sheep was swimming in the open sea for more than half an hour, 18.08.2020.



Figure 44. A boat from the port trying to rescue the animal from water. Without our intervention, the animal would have drowned, and no-one would have noticed.

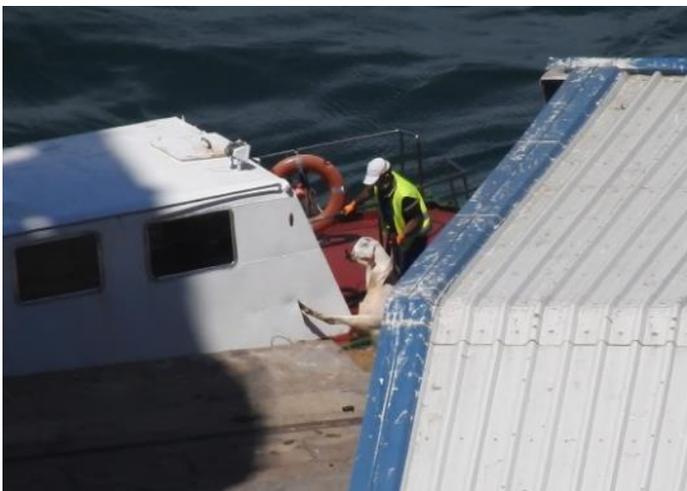


Figure 45. Animal rescued from the sea after our team alerted port authorities, 18.08.2020.



Figure 46. After the animal is rescued, it is put by the workers into the final gangway and loaded directly on the vessel, instead of being isolated and inspected by an official veterinarian, 18.08.2020.

Note: More photographic evidence of loading of SARAH M available on request. Footage by Animal Welfare Foundation, Tierschutzbund Zürich.

IV. Photo evidence of loading of FREEDOM, 09.07.2020



Figure 47. FREEDOM. Cartagena, 09.07.2020.



Figure 48. The whole 4-day-long journey by sea from Cartagena to Libya of FREEDOM loaded with European animals. Mediterranean Sea, 10.07-14.07.2020⁴⁸.



Figure 49. Employee of Agencia Marítima Blazquez handling the animals incorrectly, using electric prods when the ramp is totally blocked, and the animal cannot move forward, 09.07.2020.



Figure 50. Employee of Agencia Marítima Blazquez handling the animals incorrectly: using electric prod on sensitive areas of the animals such as their face, 09.07.2020.

⁴⁸ Source: Vesseltracker.com



Figure 51. Animals are getting particularly scared at the end of the ramp, because the entrance door to the vessel is too narrow and dark, 09.07.2020.

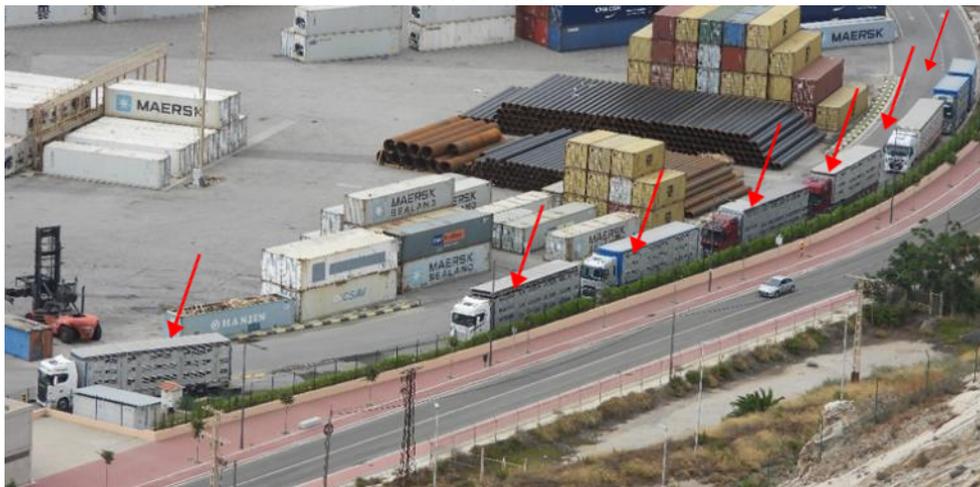


Figure 52. Scale area where trucks waited for several hours without shadow because scale operators were not working during that period.



Figure 53. Animals from UK and France kept on trucks without shadow, external temperature of 34°C, 09.07.2020.



Figure 54. Animals from Netherlands kept on trucks without shadow, external temperature of 34°C, 09.07.2020.

Note: More photographic evidence of loading of FREEDOM available on request. Footage by Animal Welfare Foundation, Tierschutzbund Zürich, Animals International and Welfarm.

V. Photo evidence of loading of FREEDOM, 19.08.2020



Figure 55. FREEDOM. Cartagena, 19.08.2020.



Figure 56. The whole 6-day-long journey by sea from Cartagena to Libya of FREEDOM loaded with European animals. Mediterranean Sea, 19.08-24.08.2020⁴⁹.



Figure 57. Young calves loaded to be sent to Libya, today workers are relaxed and wear masks, 19.08.2020.

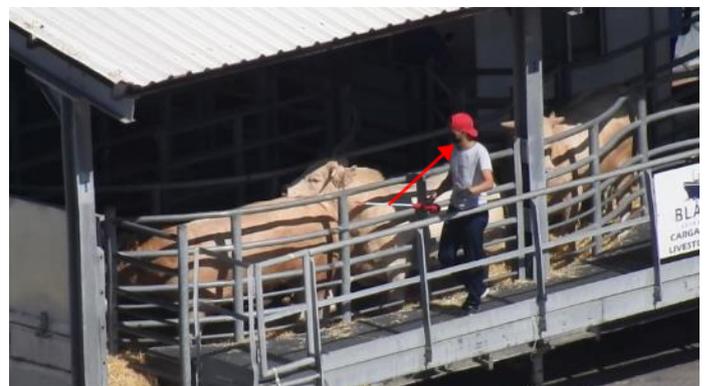


Figure 58. Adult animals in corridor before loading on Freedom, today workers are relaxed and wear masks, 19.08.2020.

⁴⁹ Source: MarineTraffic.com



Figure 59. In the morning in the loading area, we notice people who seem to be official authorities, it looks like they are controlling and inspecting the loading procedure, 19.08.2020.



Figure 60. We observe people who seem to be a competent authority as they are inspecting the injured bull. One hour later the animal is loaded back on a truck (license plate: (ES) 5749 GGR) and declared unfit to continue the journey by sea.



Figure 61. Animals getting particularly scared at the end of the ramp, because entrance door to vessel is too narrow and dark, 19.08.2020.



Figure 62. Animals getting stuck at the end of the ramp, because of their long horns do not fit in the narrow ramp.

Note: More photographic evidence of loading of FREEDOM available on request. Footage by Animal Welfare Foundation, Tierschutzbund Zürich.

VI. Photo evidence of loading of AL FAROUK (HANNOUD-O), 08.07.2020

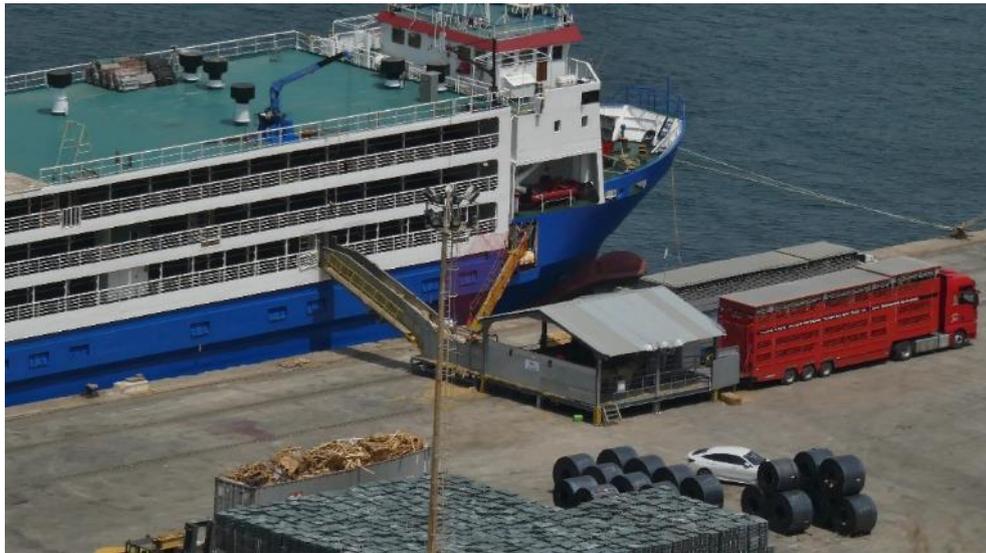


Figure 63. AL FAROUK (HANNOUD-O). Cartagena, 08.07.2020.

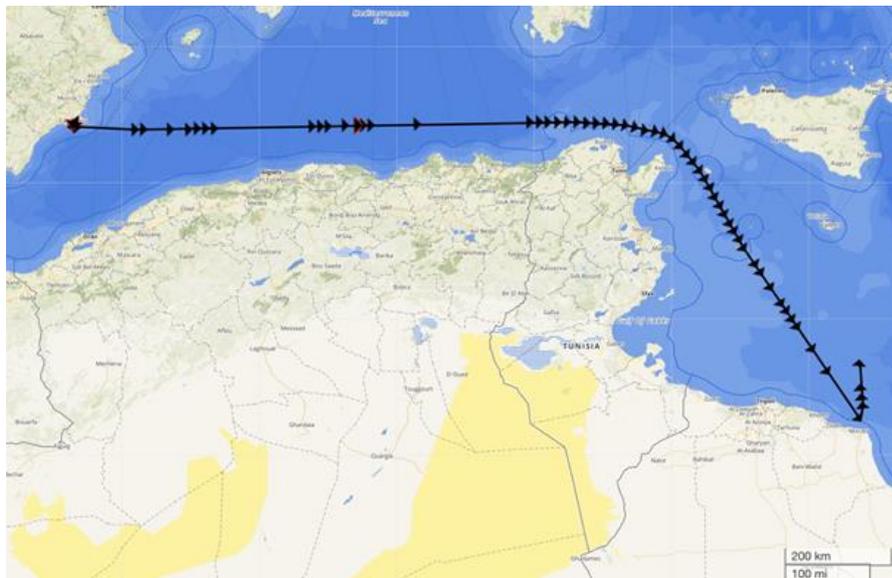


Figure 64. The whole 6-day-long journey by sea from Cartagena to Libya of AL FAROUK (HANNOUD-O) loaded with European animals. Mediterranean Sea, 09.07-13/14.07.2020⁵⁰.



Figure 65. Animals from Spain kept in trucks before loading on the vessel without shadow, external temperature of 32°C, 08.07.2020.

⁵⁰ Source: Vesseltracker.com



Figure 66. Animals from Portugal kept in trucks, External temperature of 32°C, 08.07.2020.



Figure 67. Animals with stress symptoms. External temperature of 32°C, 08.07.2020.



Figure 68. Animals overcrowded in the trucks, 08.07.2020.



Animals kept in trucks before loading on the vessel without shadow, external temperature of 32°C.



Figure 69. Animals waiting before unloading from truck and loading on the vessel, 08.07.2020.



Figure 70. Ramps from the trucks are too steep (angle exceeding 26°34'), failing to ensure that animals walk down without risk of injury or difficulties. We see many animals falling down, 08.07.2020.



Figure 71. Ramps too steep. Animals scared to go down from truck, 08.07.2020.



Figure 72. Another animal escaping from loading area. Unskilled employee trying to catch the animal, 08.07.2020.



Figure 73. Very often animals get their legs trapped and thus get stuck in gangway, 08.07.2020.



Figure 74. Animals getting stuck at gangway and first part of corridor, getting on top of each other, trying to escape in different directions, 08.07.2020.



Figure 75. Too often we see port employees (orange vest) dragging animals by their fleece—a forbidden practice, 08.07.2020.



Figure 76. Crew members working on vessel ramp very frequently hitting animals with sticks, 08.07.2020.



Figure 77. Shading recently installed inside the port is only sufficient for 10 vehicles parked at the same time. Animals on other vehicles still suffer long hours of vehicle standstill in the sun, 08.07.2020.



Figure 78. Sheep loaded not only in pens, but also in lateral corridors. This means that animals are loaded in area not approved for animals, which is against the Regulation, 08.07.2020.



Figure 79. Most pens and corridors are overcrowded. It is very possible that with animals loaded in corridors, the vessel is overloaded, 08.07.2020.

Note: More photographic evidence of loading of AL FAROUK (HANNOUD-O) available on request. Footage by Animal Welfare Foundation, Tierschutzbund Zürich, Animals International and Welfarm.

VII. Photo evidence of Nabolsi I, 08-09.07.2020



Figure 80. NABOLSI I in course of inspection. Cartagena, 08.07.2020.



Figure 81. The whole 5-day-long journey by sea from Cartagena to Libya of NABOLSI I loaded with European animals. West Mediterranean 09.07-14.07.2020⁵¹.



Figure 82. NABOLSI I with food and straw for animals on the deck. Cartagena, 09.07.2020.

Note: More photographic evidence of NABOLSI I available on request. Footage by Animal Welfare Foundation, Tierschutzbund Zürich, Animals International and Welfarm.

⁵¹ Source: Vesseltracker.com

VIII. Photo evidence of ELBEIK, 09.07.2020



Figure 83. Arrival of ELBEIK. Cartagena, 09.07.2020.



Figure 84. The whole 5-day-long journey by sea from Cartagena to Libya of ELBEIK loaded with European animals. West Mediterranean 10.07-14.07.2020⁵².

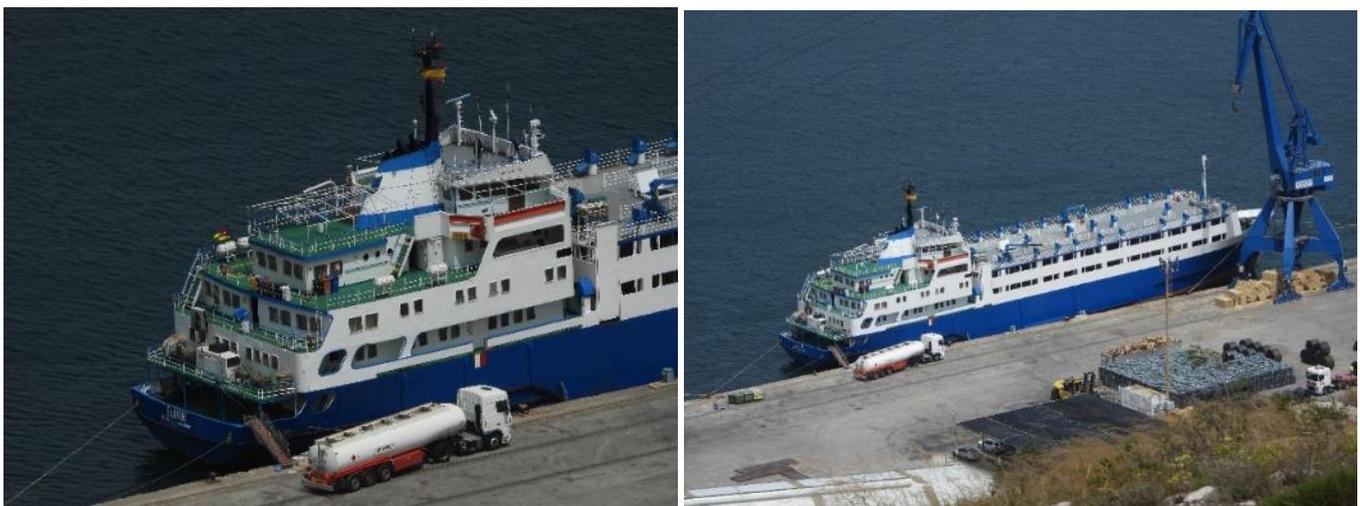


Figure 85. ELBEIK. Cartagena, 09.07.2020.

Note: More photographic evidence of ELBEIK available on request. Footage by Animal Welfare Foundation, Tierschutzbund Zürich, Animals International and Welfarm.

⁵² Source: Vesseltracker.com

IX. Photo evidence of ear tags of animals loaded on vessels



Figure 86. Dutch bulls. Cartagena, 09.07.2020.



Figure 87. French bulls. Cartagena, 09.07.2020.



Figure 88. Spanish sheep. Cartagena, 08.07.2020.



Figure 89. Spanish bulls. Cartagena, 09.07.2020.



Figure 90. Portuguese sheep. Cartagena, 08.07.2020.

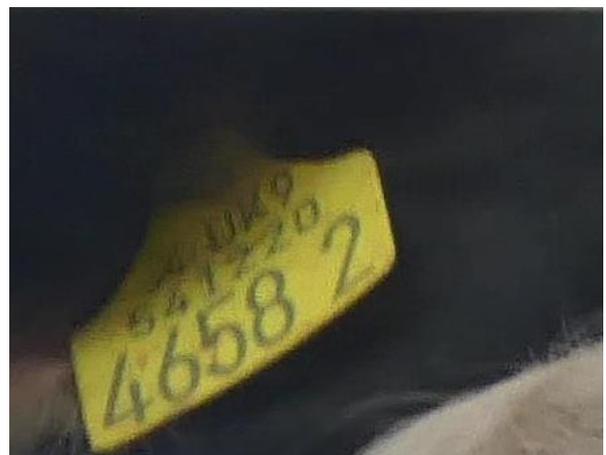


Figure 91. English bull. Cartagena, 09.07.2020.

Note: More photographic evidence of animals loaded available on request. Footage by Animal Welfare Foundation, Tierschutzbund Zürich, Animals International and Welfarm.

X. Map of Cartagena Port



Figure 92. Map of Cartagena Port. Loading, waiting and mooring zones.