The Production of Horsemeat in Uruguay
An investigation carried out in cooperation with Tierschutzbund Zuerich/Animal Welfare Foundation

Introduction:

Uruguay is a small country but nevertheless has an estimated population of 500,000 horses. More than 37,000 horses were slaughtered in 2014, but only for export. Uruguayans do not consume horsemeat; they consider horses as companion, sport and work animals. Horses are not commercially bred for meat production and there is no traceability regarding drugs that have been administered to the horse during his life. The last owner of the horse simply has to sign an affidavit and confirm that the horse has not been given any restricted substances during the last 6 months. Phenylbutazone and many other drugs can be readily purchased without prescription. Uruguayan law mandates that sport horses are excluded from slaughter for human consumption\(^1\), but it remains questionable if this is really the case.

\(^1\) Decreto No.169/010
There are three horse slaughter plants in Uruguay; all of them are approved for export of horsemeat to the European Union: Clay SA (owned by the French company S.N.V.C.), Sarel SA (owned by the Belgian company Multimeat) and Agroindustrial Del Este SA.

In 2014, Clay slaughtered 17,730 horses, Sarel 11,660 horses and Agroindustrial del Este 8,320 horses, which is 28.8 percent increase from 2013. The increase might be due to the fact that horsemeat exports from Argentina and Mexico have decreased/ceased due to our EU-wide campaign against imports from these countries. Especially since the complete ban of all horse meat from Mexico, European and Swiss importers started to switch to Uruguay.

In 2012, Uruguay adopted a regulation for the protection of animals at slaughter\(^2\); however, there is still no legislation for animal welfare during transport. Transport vehicles are not appropriate for the transport of horses, especially over long distances such as slaughter horse transports coming from Brazil.

In addition to the horses that are legally imported from Brazil, hundreds or even thousands of horses are shipped illegally across the border. A police investigation recently uncovered that during the last three years, three farmers smuggled more than 2,000 horses from Brazil across the border, supplied them with fraudulent paperwork and sold them to several slaughterhouses in the south of Uruguay (Clay and Sarel are the only horse slaughter plants in the south). 1,576 horses were reported stolen in Rio Grande do Sul in the south of Brazil in 2012\(^4\). According to the Military Police of Rio Grande do Sul, 90% of the thieves are from Uruguay and steal the animals for slaughter in the neighbouring country\(^5\).

**Investigation:**

**Slaughterhouse Clay**

**Address:**
Frigorífico Clay S.A.
Totoral del Sauce
Departamento Canelones, Uruguay

**Owner:** Société Normande de Viandes et de Courtages (S.N.V.C.) – Groupe Harinordoquy, France

**Director:** Pierre Harinordoquy

**Veterinarian / Animal Welfare Officer:** Dr. Guillermo Caruso


\(^3\) DGSG/ N°152/012


\(^5\) [http://www.mnp.org.br/?pag=ver_noticia&id=454100](http://www.mnp.org.br/?pag=ver_noticia&id=454100)
Clay is not only a slaughter plant, but also an “acopio” (collecting station). In Uruguay, horses have to stay 40 days at an “acopio” prior to slaughter. **Before horses enter the “acopio”, they have to get an ear tag for identification**. The ear tag number has to be noted on the affidavit of the last owner regarding medical treatments during the last 180 days.

Not all horse collecting stations in Uruguay are registered “acopios”. Some horse dealers do not keep the horses for 40 days before sending them to the plant and whenever these horses arrive at the plant without ear tags they have to be kept 40 days at the plant before being slaughtered. Only horses that arrive from an approved “acopio” and are identified by ear tags can be slaughtered right away.

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6 Decreto No.169/010
Observations:
Investigators arrived at 9:00 am. The plant has two unloading ramps, one at the plant and one at the collecting station. The collecting station consists of several large pens holding horses, but also some donkeys, goats and cattle. Most of these pens are dry lot pens and become very muddy during heavy rain. Some pens have no shelter; in other pens dilapidated remains are visible, leaving the majority of the animals without protection from sun and rain.

Insufficient shade for all the horses  Broken shelter
All horses had access to water and food. Most horses were too far away from the road to assess their condition. Some horses were lying down flat on the ground in full sun, without moving. **Several mares seemed to be heavily pregnant.** Some horses had no ear tags, making it **highly questionable that they had the necessary paperwork.** One horse without ear tag was **emaciated,** appeared very weak and the way he walked indicated that he was in pain. In the same pen were **several other, thin horses** with hip bones and ribs clearly visible.

**Dr. Guillermo Caruso, the veterinarian responsible for animal welfare at Clay,** told the investigators that some pastures belonged to neighbours and that those horses were not for slaughter. He also claimed that they would not accept riding horses and that all the horses were
from Uruguay\(^7\). The horsemeat is only for export, mainly to Europe and Russia. Their customers in Europe have high demands regarding animal welfare. Dr. Caruso said that they complied with all EU animal welfare requirements. Whenever injured horses arrive at the slaughterhouse, they would be slaughtered first, and if they are severely injured, they would be euthanized immediately. Usually, the horses are slaughtered within 2 to 3 hours after arrival at the plant.

At 2:00pm, a horse transport arrived at the plant and backed up to the unloading ramp. The open-roof trailer appeared old, dilapidated and overcrowded. No ear tags were visible, which begged the question why the horses were unloaded at the plant and not at the collecting station. Only horses with ear tags can legally be slaughtered.\(^8\)

Investigators positioned themselves in San Jacinto, which is about 6 Miles away from Clay, to wait for horse transports. At 3:00pm, a truck of the company Bardanca loaded with horses drove by and investigators followed him to the plant. Ruben Fabian Bardanca is one of the main suppliers of Clay, but also runs a transport company. The trailer had two compartments and the horses were divided in three groups. The open roof trailer offered no protection from the burning sun.

\(^7\) According to Uruguayan statistics, Clay imports live horses from Brazil.
\(^8\) Decreto No.169/010
Ruben Bardanca is a horse dealer, not an “acopiador”, which means that he does not have to keep the horses for 40 days at his collecting station. However, when his horses arrive at Clay, they have to be kept 40 days in the “acopio” of the plant. Strangely, the truck unloaded the horses directly at the slaughter plant and not at the “acopio”. The horses were moved through the low trap-door between truck and trailer, which holds a high risk of head injuries.
Sarel Horse Slaughter Plant

Address:
Frigorífico Sarel SA
Sauce
Departamento Canelones, Uruguay

Owner: Multimeat, Belgium
Manager: Luis Danner

Investigators followed a horse transport from Totoral del Sauce to the Sarel plant. The truck had **no roof and therefore offered no protection from sun and rain.** Only one divider was placed, the truck appeared **overcrowded and a lot of biting** was observed. The horses appeared to all have ear tags.

*Horses fighting on board of truck*  
*Truck arriving at Sarel*

At 10:55am, the transport arrived at the plant. Horses were visible in the paddocks next to the main road. Straw was available for the horses in addition to some grass, but there was **no shelter from the sun.** The horses had several tags attached to their backs. Most of them seemed to be in good physical condition. However, a **thin horse, whose rips and hip bones were clearly visible,** was lying down and appeared to be exhausted.
At 3:30pm, another horse transport arrived at Sarel. It appeared very overcrowded and the metal bars above the horses’ heads were very low causing the tall horses to hit their heads. All horses had ear tags.

Collecting station of Diego Roberto Bonfrisco Oliveira

Address:
South of Artigas city
Departamento Artigas, Uruguay
From a reliable, confidential source investigators received the information that Bonfrisco is one of Clay’s ten biggest suppliers and shipped 438 horses to Clay in 2014. At the collecting station were two buildings, which both were very dilapidated. The windows of the one building are covert with a tarp from “Frigorifico Clay SA”, the Clay slaughter plant. Behind that building were a few empty holding pens. Next to the pens, there were some bags filled with tail hair of horses. An adjacent loading ramp was in very bad condition.
On a large pasture behind the holding pens were approx. 20 horses, among them a foal and a pregnant mare. Some horses were \textit{thin and their ribs were clearly visible}. Two horses were \textit{lame}. Parts of the pasture were covered in \textit{bones}. 

\textit{Pasture covered in bushes which make it difficult to monitor the horses}

\textit{Bones}
There is no shelter in the pasture or any shade trees, offering the horses no protection from the elements. Bonfrisco’s collecting station is not a registered “acopio” and therefore the horses had no ear tags. However, several of the horses were also without brand mark, which is a violation of Uruguayan law. Since there were no brand marks, it is highly questionable that the horses had the mandatory identification document called “Guía de propiedad y transito” (proof of ownership and transfer) in which the brand mark of the horses has to be recorded.

**Border crossing in Rivera**

The Uruguayan city Rivera and the Brazilian city Santana do Livramento have merged together, with one side of the street “Wilson-Ferreira-Aldunate” at the border belonging to Uruguay and the other side to Brazil. There are no identity checks at this border and people move freely between the two countries. Semis are not allowed to cross the border in the city centre and have to take an alternative route. There is an inspection post for trucks, however, it is closed at night and there are no barriers so trucks can simply cross the border, making it very easy to smuggle animals across.

A recent police investigation uncovered that three farmers from Rivera illegally shipped over 2’000 horses from Brazil during the last three years and sold them to several slaughter plants in Uruguay. The police expect this to be only the tip of the iceberg, since there are a lot of “green” borders without any border controls in the Departamento of Rivera.

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9 CÓDIGO RURAL, Actualizado Marzo 2010, Art. 173
**Horse slaughter plant Agroindustrial Del Este**

**Address:**
Frigorífico El Amanecer (Agroindustrial Del Este S.A.)
Treinta y Tres
Departamento Treinta y Tres, Uruguay

*Observations:*
Agroindustrial Del Este is only approved to slaughter horses, no other animals. Behind the dilapidated slaughter plant building were some empty pastures, overgrown with waist-high bushes. Behind one of these bushes, investigators found a **dead horse in an advanced state of decay**. Next to the decaying carcass was another horse skull. There were several more skulls visible; none of them had any **bullet holes indicating that the horses were left to die instead of being euthanized.**
A slaughter plant worker showed investigators two horses in an adjacent pasture belonging to the municipality of Treinta y Tres. The two horses were **confiscated by the police last year together with 35 other horses that were transported without any documents and evidence of origin.** The police had given them into the custody of the slaughter plant and all but 2 have since disappeared. Some of them have died, but most have been stolen from the pastures and were presumably sold to other slaughter plants.

Next to the slaughter plant, there were eight holding pens with high concrete walls and no protection from the sun. The pens commonly hold groups of approx. 10 horses, which are moved together into the holding area leading into the plant. There, they are **hosed down with water, a procedure that frightens the horses.** The worker often **aims the water directly at their faces.** In the chute that leads up to the entrance of the building, the horses are also moved with a water hose. Again, the water is aimed directly at the horses’ faces, what makes them go back instead of moving forward. The **floor of the chute is slippery** from water and faeces.

Investigators observed a white horse **slipping, falling and struggling to get up again.** **Loud noise could be heard** from inside the plant and some horses in the chute showed strong signs of panic (rapid ear and head movements). **An electric prod was used on the horses first in line** to make them enter the building. The cut-off legs of the slaughtered horses were observed being discarded through an opening in the wall.

Investigators observed two groups of 10 horses being hosed down and moved up the chute. Several horses were in deplorable condition, **severely emaciated with their ribs clearly visible.** Many had **scratches and abrasions on their bodies.** Two horses had **open cuts on their forehead and around the eyes,** one horse had **bleeding injuries along the spinal cord.** Many of these injuries likely occurred during transport.
Holding pens with no shelter from rain and sun

Water jet being aimed at the horses’ heads

Chute leading up to the entrance of the slaughter plant
Use of electric prod and water hose to move the horses

Horse showing strong signs of fear

Horse falling down in the chute

Cut-off legs
Severely emaciated horses, one with bleeding injuries along the spine

There were several horses without ear tags, which was a violation of Uruguayan law\textsuperscript{10} which requires that the official veterinarians at the plant shall not accept horses for slaughter without ear tags and accompanying documents. Since these horses did not have ear tags, it was highly questionable if they had the required affidavit regarding the medical history of the animal. The same law requires that sport horses are to be excluded from slaughter for human consumption. In Uruguay, sport horses are identified by microchip and such horses would have to be rejected at the slaughter plant. However, there was no procedure in place to check whether or not arriving horses had a microchip.

\textsuperscript{10} Decreto No.169/010
Information received from Mr Teixeira, the custodian of the plant:

- The horses are slaughtered on Tuesday and Thursday and cut on the following days.
- Up to 200 horses can be slaughtered per day.
- The average value of a horse is 300 USD.
- No horse without ear tag may be slaughtered.
- The horses are stunned by electrical current applied to their heads.
- Official veterinarians are present during slaughter.
- Last year, 35 horses without papers were confiscated by the police in the Departamento of Artigas and brought to the plant to be cared for. Five of them died, 28 horses have been stolen from the plant’s pastures and have most likely been sold to other slaughter plants.
- In the past, other horses have been stolen from their pastures by cutting the fences. A few years ago, the gate of the holding pens was forced open and 14 horses were stolen.

Collecting station of Julio Richard Prego Perdigon
Departamento Canelones, Uruguay

The collecting station of Richard Prego near Canelones is in the south of Uruguay. From a reliable, confidential source investigators received the information that he is one of Clay's largest suppliers and shipped 1147 horses to Clay in 2014. There were approx. 20 horses in the holding pens and a few more in the pastures. Several horses still had auction tags attached to their backs and had only recently been bought at a sale. The horses appeared to be in good condition, yet some of them had neglected hooves that needed trimming. Several horses did not have the mandatory brand mark on their left hindquarters as required by law.11

11 CÓDIGO RURAL, Actualizado Marzo 2010, Art. 173
A horse transport arrived and unloaded a single horse, which had **bleeding cuts on the forehead and on his hind leg.** The trailer had an open roof and a metal grid on the floor. After the horse was unloaded, a worker gathered horse shoes from the trailer floor, which had to have fallen off during previous transports. **The fact that horses were transported with horse shoes holds a high risk of injuries** as the frightened animals tend to kick each other.

The horses did not have ear tags, since this was no registered “acopio” (horse collecting station) where horses have to stay for 40 days prior to slaughter. An employee was busy cutting the manes of the horses and explained that he was preparing them for an **auction held in San Antonio the next day.** He said that they would **ship 400 horses to the auction.**

**Horse auction in San Antonio**

**Address:**
Local “San Isidro” – Remata Vizoso  
Ruta 33  
San Antonio  
Departamento Canelones, Uruguay

At 3:30pm, investigators arrived at the auction site called “San Isidro” outside San Antonio. There were several buildings, an outdoor auction ring, numerous holding pens and some large pastures. Most of the horses already present were on the pastures, where they had access to water and hay. Investigators were told by auction workers that 230 horses had already been delivered and about half of them were yearlings. A total of 500 horses would be sold.
A horse transport was parked at the ramp and was unloading a few horses. The unloading was quite chaotic and the horses were being hit with long sticks. In the alley leading to the pens, the auction tags were attached to the horses’ backs. Some horses still had parts of old auction tags attached, indicating that they were moved from one auction to the other. A young foal and several ponies were among the adult horses. They should have been transported separately, as the risk of them being trampled is very high. Several horses were biting and kicking each other.

Horses of different sizes transported together  
Horse showing aggressive behaviour

There were several injured and/or lame horses, a thin horse could only bear weight on three legs and his left front leg seemed to be broken. This horse was not fit for transport and should never have been brought to the auction. A pony had what appeared to be a tendon rupture and severely overgrown hooves. A brown horse had a deep open wound at the right shoulder; another horse had a wound on the left hip. A very young foal had abrasions on body and head. Many horses had bleeding cuts and abrasions, which likely occurred during transport. Several
horses were thin and their ribs clearly visible. About **10 to 15 % of the horses did not have the mandatory brand mark.**

After unloading, the whole group of horses was moved into a big pen where they were divided into smaller groups. The workers **separated the horses from each other using ropes and the animals were clearly frightened.** An auction worker informed the investigators that the horses were divided into the following groups: riding horses, sport horses, working horses and **horses “for the industry”, which means slaughter horses.**
One horse that an employee had been riding had an **open, infected wound** on his right hind leg, which was swollen. The employee stated that the horse had been **injured by barb wire**. On the pasture, investigators spotted a gelding that was **severely lame and had great difficulty walking**. He was **not fit for transport** and should not have been brought to the auction.

A small livestock truck arrived and started unloading horses, which were **very nervous and frightened**. The **exit through the trap-door was very small** and the horses were reluctant to walk out of the trailer. Again, a **young foal was loaded together with the adult horses**.
At 1:20pm the next day, the employees started rounding up the horses in the pastures. They moved them in groups to the pens behind the buildings, to which visitors had no access. The red horse trailer and truck of Richard Prego, which investigators saw the day before at his collecting station, were parked on the auction premises.

The sale started at 3:00pm. The handling of the horses was very rough. The horses were frequently beaten excessively, also on their heads. A panicked horse tried to jump over the fence of the holding area. Both riding and loose horses were chased through the auction ring for about 1-2 minutes. The horses showed strong signs of fear, especially the foals which were sold separate. A yearling was so frightened that he jumped the gate in order to escape the auction ring.
Numerous horses are injured, sick or very thin. In addition to the horses noted the day before, investigators observed the following:

- A foal with a strangles infection, a highly infectious disease. (sold for 57 USD)
- A horse with an open wound on the right front leg, stretching all the way from the coronary band up to the cannon bone. (sold for 340 USD)
- An extremely emaciated chestnut gelding, which was very weak and could hardly move. He should have never have been accepted for sale. (sold for 170 USD)
- A horse with a broken fetlock, standing on three legs only. This horse should never have been transported to the auction. (sold for 445 USD)
- A very young foal with a broken leg.
- Many horses had bleeding scratches on their bodies, which probably occurred during transport or from fighting in the pens.
- A lot of foals and yearlings were thin and their ribs were clearly visible.
- Many horses were lame.

All horses were sold in US Dollars. Riding horses were sold for 500-1100 USD, foals for 300-350 USD, loose horses sold for 400-500 USD and ponies for 250-300 USD.

The severely lame gelding noted the day before was also chased through the auction ring and sold for 600 USD. The thin horse with the broken left front leg, which could only bear weight on three legs, also hobbled through the ring and sold for 270 USD. Many horses could not be sold for the asking price and their seller no-saled them (approx. 10 to 15 % of the horses). Some of the injured and lame horses were sold for quite a high price and therefore most likely ended up in a slaughter plant since several kill buyers were present. Large groups of young foals were sold separated by sex; the females were likely bought by the PMSG industry.
After the horses were moved through the auction ring, they were put into large pens where a lot of fighting was observed. The sale lasted until 9:00pm, but most of the sold horses stayed overnight without access to water or food. At 7:00am the next morning, the first auction workers arrived. At 7:20am, a blue/white semi with trailer backed up to the loading ramp. Dogs were chasing the horses from the pens to the loading ramp. The workers used long sticks with white flags to guide but also to hit the horses. The horses were moved through the low trap-door between trailer and semi, which created a high risk of head injuries. When the trap-door was closed, it fell onto the back of a horse and made it charge forward. At least 10 foals were loaded together with the adult horses.
At 8:00 am, the loaded truck leaves the auction premises with 43 horses on board.

On one of the pastures, investigators noticed the extremely emaciated gelding. Although he had to be extremely hungry, he did not eat, he just sniffed the grass. Another very thin horse was lying down, while a bay horse held up his left hind leg and appeared to be in pain.
Several horse transports similar to the one observed earlier arrived at the sale and started loading horses. Again, dogs were used to move the horses and the handling was rough and chaotic.
Interview with Dr. Homero Cabanas, President of the National Animal Welfare Committee CONAHOBA (Comisión Nacional Honoraria de Bienestar Animal)\textsuperscript{12}.

Dr. Cabanas stated that the welfare of farm animals was not the responsibility of the CONAHOBA, but of the Ministry of Livestock, Agriculture and Fisheries (MGAP). The CONAHOBA is in charge of the welfare of animals like cats and dogs, but also of horses that are used to pull the carts of garbage recyclers.

Dr. Cabanas admitted that there was no animal welfare law in Uruguay regarding the conditions & treatment of farm animals destined for meat production. However, regulations exist for slaughter plants. There is a new legal regulation which is based not only on the recommendations of the OIE but also on the requirements of the importing countries. For example, since November 2013 there has to be an animal welfare officer at each slaughter plant. However, the new regulation only applies to plants which are approved for export. The production of horsemeat is only allowed for export, not for the internal market. The reason for this is that Uruguayans do not eat horsemeat; however, in the past horsemeat was sold as beef.

When being asked about traceability, Dr. Cabanas said that the traditional method of identification is hot-branding farm animals, including horses, and that the law was still in force. However, the brand mark is more and more replaced by ear tags. Since horse meat is not consumed within the country but exported, the requirements regarding traceability and the controls would be more lax.

Dr. Cabanas explained that only sport horses had to be identified by microchip and that it was prohibited to send them to slaughter for human consumption due to the medicines these horses have been administered. The official veterinarians at the slaughter plants would have to ensure that sport horses weren’t getting into the slaughter process.

Interview with Dr. Sienra and Dr. Armstrong, Ministry of Livestock, Agriculture and Fisheries

According to Dr. Sienra, there are no specific animal welfare laws for farm animal husbandry. Uruguay has an animal welfare law, but it does not include any specific requirements for farm animals. There is no specific regulation for protection of animals during transport either and therefore no sanctions for animal welfare violations during transport. However, Uruguay has legal requirements for animal welfare at slaughter (DGSG N°152/012).

Dr. Armstrong stated that upon arrival at the slaughter plant, all horses had to be checked with a microchip reader and if a horse had a microchip, it had to be excluded from slaughter.\textsuperscript{13}

\textsuperscript{12} http://www.mec.gub.uy/innovaportal/v/55767/2/mecweb/acerca-de?3colid=55686&breadid=55680
\textsuperscript{13} At the slaughter plant in Treinta y Tres, no such procedure was observed.
Regarding traceability, all horses had to be identified by branding.\textsuperscript{14} The mandatory brand mark would be the proof of ownership.

**Purchase of Phenylbutazone**

Investigators visited a veterinary pharmacy in San Jacinto, Canelones, and covertly filmed the purchase of Phenylbutazone \textit{without a prescription}. The only information they gave the pharmacist was that it would be needed for a horse. The medicine costs 142.00 Uruguayan Pesos, which is about 5.00 USD.

\begin{figure}[h]
\centering
\includegraphics[width=0.8\textwidth]{phenylbutazone.jpg}
\caption{Phenylbutazone sold without prescription}
\end{figure}

\textit{Clay Horse Slaughter Plant:}

When investigators returned to the Clay plant, they noted that the pens next to the slaughter plant building were tightly filled with horses, indicating that they were slaughtering that day.

At the “acopio” pens, there were several thin horses with their ribs clearly visible and 2 horses that were injured. Both injured horses could only bear weight on three legs. They both held up the injured leg and their posture indicated pain.

\textsuperscript{14} During the investigation, investigators repeatedly detected horses without brand mark: at slaughter plants, collecting stations and the horse auction.
At 12:30pm, a horse transport arrived at the plant and backed up to the unloading ramp. The open-roof transport consisted of a truck and trailer and had four trap doors. **Some horses had auction tags attached** and others had white or black numbers written on their hindquarters. The horses did not have ear tags. **Why were horses without ear tags but with auction tags unloaded at the slaughter plant and not at Clay’s “acopio” (collecting station), since only horses with ear tags can legally be slaughtered?**
A grey horse touched the trap-door with his back and went down. A dark bay horse was severely lame and several horses were thin with their hip bones clearly showing.

From a reliable, confidential source investigators received the information that on the November 19, 2014, the police inspected a horse transport at the Clay plant and confiscated 17 horses without papers and of unknown origin.
The investigation revealed multiple violations of EU regulations:

1. At the plant

Slaughterhouses in third countries exporting meat to the EU have to comply with minimum standards regarding animal welfare, as required in EU Council Regulation No 1099/2009 on the protection of animals at the time of killing\(^\text{15}\). Article 12 of Chapter II states:

**Imports from third countries**

The requirements laid down in Chapters II and III of this Regulation shall apply for the purposes of Article 12(2)(a) of Regulation (EC) No 854/2004.

The health certificate accompanying meat imported from third countries shall be supplemented by an attestation certifying that requirements at least equivalent to those laid down in Chapters II and III of this Regulation have been met.

Evidence obtained at EU approved slaughterhouses in Uruguay shows that they do not comply with many requirements of Chapter II and III of Council Regulation No 1099/2009 on the protection of animals at the time of killing:

- Chapter II, Article 3.1. Animals shall be spared any avoidable pain, distress or suffering during their killing and related operations.
  - Observations: use of electric prod and spraying strong water jet at horses' faces (Agroindustrial)

- Chapter II, Article 3.2 For the purposes of paragraph 1, business operators shall, in particular, take the necessary measures to ensure that animals: (a) are provided with physical comfort and protection, in particular by being kept clean in adequate thermal conditions and prevented from falling or slipping;
  - Observations: no or not enough protection from sun and rain (Sarel, Clay, Agroindustrial), manure covered floors in outdoor pens (Clay), slippery concrete floors (Agroindustrial)

- Chapter II, Article 3.2 For the purposes of paragraph 1, business operators shall, in particular, take the necessary measures to ensure that animals: (d) do not show signs of avoidable pain or fear or exhibit abnormal behaviour;

- Chapter II, Article 7.1. Killing and related operations shall only be carried out by persons with the **appropriate level of competence to do so without causing the animals any avoidable pain**, distress or suffering.
  - Observations: employees appear to be untrained, using violent methods like electric prodding and spraying water at horses' faces (Agroindustrial)

- Chapter III, Article 14.1. Business operators shall ensure that the layout and construction of slaughterhouses and the equipment used therein comply with the rules set out in Annex II.

- Annex II, Article 2.5. Floors shall be built and maintained in such a way as to **minimise the risk of animals slipping, falling** or injuring their feet.
  - Observations: horses observed slipping and falling on the wet and manure-covered floor (Agroindustrial)

- Annex II, Article 2.6. Where slaughterhouses have field lairages without natural shelter or shade, appropriate **protection from adverse weather conditions** shall be provided. In the absence of such protection, these lairages shall not be used under adverse weather conditions.
  - Observations: no shelter and thus no protection from sun and rain (Sarel, Agroindustrial), pens with and without shelter (Clay), broken shelter and thus not enough weather protection (Clay)

- Chapter III, Article 15.1. Business operators shall ensure that the operational rules for slaughterhouses set out in Annex III are complied with.

- Annex III, Article 1.1. The **welfare conditions of each consignment of animals shall be systematically assessed** by the animal welfare officer or a person reporting directly to the animal welfare officer upon arrival in order to identify the priorities, in particular by determining which animals have **specific welfare needs** and the corresponding measures to be taken.
  - Observations: injured/sick horses present in outdoor pens which should have been euthanized immediately after arrival to end their suffering (Clay, Sarel), horses left to die in outdoor pens (Agroindustrial)

- Annex III, Article 1.9. The use of **instruments which administer electric shocks** shall be avoided as far as possible. In any case, such instruments shall **only be used for adult bovine animals and adult pigs** which refuse to move, and only when they have room
ahead of them in which to move. The shocks shall last no longer than one second, be adequately spaced and shall only be applied to the muscles of the hindquarters. Shocks shall not be used repeatedly if the animal fails to respond.

- Annex III, Article 2.4. Every day that the slaughterhouse operates, before any animal arrives, isolation pens for animals that require specific care shall be prepared and kept ready for immediate use.
  - Observations: injured/sick or dying horses kept in the same pens with other horses (Clay, Sarel, Agroindustrial)

- Annex III, Article 2.5. The condition and state of health of the animals in a lairage shall be regularly inspected by the animal welfare officer or a person having appropriate competence.
  - Observations: injured/sick horses left in outdoor pens showing obvious signs of pain (Clay, Sarel), horse carcass and several horse skulls with no bullet holes lying around in outdoor pens (Agroindustrial)

2. Other Areas of Concern

The EU Regulation 1/2005 on the protection of animals during transport does not apply outside the EU. There is no Uruguayan legislation to protect the horses during transport.

Observations:

Trailers used create a high risk of injuries, the open roofs offer no weather protection, low trap doors can cause serious head injuries.

Dogs were used to move and to load horses

Ponies and foals were transported in the same compartments with adult horses; there was a lot of fighting on board of trucks