



The Commissioner for Animal Welfare

REPORT & RECOMMENDATIONS on the state of the animals kept at the Petting Farm at Ta Qali Park at ta Qali, Malta.

On the 4th January 2019, I received a complaint by Ms. Jennifer Swan¹ focused mainly on the condition of around 30 rabbits, apart from the llama pen and the goat's coats.

As the Petting Farm at Qali is under the direct control of the Parks Afforestation, Countryside Restoration and Initiatives Directorate, this complaint can be taken as directed at the Animal Welfare directorates themselves, and I therefore deemed it more appropriate to investigate it personally instead of forwarding the complaint to the normal channels.

The complaint was forwarded to the relative Directorates and replies were received from Mr. Ivan Farrugia (Director – Embellishment Ambient)² and Dr. Roberto Balbo (Director – VRD)³.

An on-site inspection was held on the 18th January, all the animals at the farm were inspected, and most of them photographed, specifically the rabbits.⁴

Regarding "*The llama pen had what looked like a pile of shredded paper. Its coat was very matted. The goats' coats were also matted and stained. The animals all looked a bit sad*" I have to immediately emphasise that I did not find any basis for this allegation. In fact, I was very impressed at the clean and orderly manner in which the Farm was being maintained. ALL the animals looked very healthy, well cared for and with adequate living area.

Ventilation fans and automatic drinkers were noted throughout and all round hygiene was pronounced.

It is true that the ruminants and equines do not really have any pasture areas but then the constraints of the limited farm area do not make this easy to correct. Anyway I have been assured that the equines are daily walked to a paddock where they can roam freely.

¹ Complaint of the 4th January 2019 by Ms. J. Swan is attached as Doc. 1. This was followed by a set of photos received on the 8th January

² E-mail of the 10th January is attached as Doc 2.

³ E-mail exchange of the 16th & 17th January 2019 is attached as Doc 3.

⁴ These photos are kept on file at the Office of the Commissioner

In any case, the whole place was well organised with the landscaping very well planned and maintained. In brief it was very gratifying to confirm that all was in such good shape.

One small comment that I however need to make is the fact that some animals, like the llama (who seems to revel in the paper shreds spread purposely in her pen), the horse and others who are on their own, would definitely benefit from some companionship by the addition of other animals, preferably of the same species and I look forward to an implementation of this observation as soon as there is an opportunity.

However, regarding the condition of the 30 rabbits, or so, being kept isolated in wire cages *"with wire frames also forming the base of the cages, without bedding which the rabbits had to lie or sit on. There was no flat solid floor or sign of any bedding. Their waste product fell through the gaps in the wire on to a tray below. The smell of waste was very strong and most of the cages had excess faeces that obviously been there for some time"* I have to regretfully conclude that the complaint is well founded.

While it is appreciated that the rabbits and the cages are being managed separately by a prominent rabbit-breeding NGO, this does not exempt either the said NGO or the management of the Farm (the property in which these rabbits are kept) from ensuring that proper stress-free conditions are observed. Whether these rabbits are for sale or otherwise is quite irrelevant and the provisions of the AW Act and all recognised animal rights need to be observed.

It was also noted that ventilation, a protected cosy environment and general hygiene were quite adequate, but it has to be observed that, although the cages might be slightly larger than minimum accepted size, any facility run with the support and approval of any Animal Welfare Directorate (the Ministry itself in fact) should ensure that, even for promotion purposes, all living conditions are very far removed from the strictly minimum conditions that would just barely save them from prosecution.

The cages, obviously designed with the exhibiting of the rabbits in mind, have only uncomfortable wire frames for flooring and no bedding whatsoever. It is evident that the wire flooring has been resorted to in order to allow the rabbit droppings to immediately fall to the tray just below, but while this could help cleanliness it is to the detriment of rabbit comfort and should be remedied. Moreover, trays would still need to be cleaned daily and the rabbit-selling NGO cannot rely that much on the expected efficiency of the wire floorings.

It is also accepted that these are not permanent cramped quarters for the rabbits exhibited for sale and that some sort of rotation was being practised with the use of the large rabbit pen next door. However, the number of rabbits being exhibited is far larger than the few rabbits observed in this pen, meaning that any rotation being practised could not ensure that any rabbit would not be left in a cage for exhibition longer than one day in three, at least.

The rabbit-selling NGO should therefore be directed to immediately modify its exhibition cages to ensure more comfort and cleanliness for the exhibited

rabbits and to reform its policy of rotation to minimise the time that a rabbit is kept in a cage, as already advised, or otherwise to exhibit and sell its rabbits, or at least some of them, directly from the open large rabbit pen next door.

Accordingly, while complimenting Mr. Farrugia, Mr. Galea and their colleagues for the excellent way they are maintaining the farm and the animals and for showing me and my colleagues around during our visit, please ensure compliance by the said NGO regarding the upkeep of its rabbit section.

Denis Montebello B.A., LL.D
Commissioner for Animal Welfare

18th February 2019

Documents Attached

Document 1 - Complaint of the 4th January 2019 by Ms. J. Swan

Document 2 - E-mail of the 10th January from Mr. I Farrugia

Document 3 - E-mail exchange with Dr. R. Balbo of the 16th & 17th January 2019.

C.C.

1. The Hon. Dr. Jose' Herrera LL.D.
Minister MESDC
2. Dr. Roberto Andrea Balbo
Director VRD
3. Mr. Noel Montebello
Director - Animal Welfare & Prom Services
4. Mr. Ivan Farrugia
Director – Embellishment Ambjent Malta

Complaint of 4th January 2019 made by Ms. Jennifer Swan regarding the condition of the animals being kept at Ta Qali Park, Ta Qali, Malta

From: Mercieca Kevin at MESDC <kevin.a.mercieca@gov.mt>
Sent: Tuesday, 08 January 2019 09:22
To: Jennifer swan <jennifer.swan@btinternet.com>; Montebello Denis at MESDC <denis.montebello@gov.mt>
Cc: Buhagiar Emanuel at MESDC <emanuel.buhagiar@gov.mt>
Subject: RE: Petting Farm at Ta'Quila Park

Dear Ms. Swan,

Good-morning.

Thanks for your email found hereunder.

In this email I am including the Commissioner for Animal Welfare Dr. Denis Montebello and I am copying Mr. Emanuel Buhagiar who works at the Office of the Commissioner for Animal Welfare.

Regards,
Kevin Mercieca
Promotional Officer
Parl. Sec. For Agriculture, Fisheries & Animal Rights

MINISTRY FOR THE ENVIRONMENT,
SUSTAINABLE DEVELOPMENT AND CLIMATE CHANGE 2, FLOOR 2, REGENT BUILDING, TRIQ IT-TIGRIJA, MARSALA, MALTA

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-----Original Message-----

From: Jennifer swan <jennifer.swan@btinternet.com>
Sent: Friday, 04 January 2019 19:33
To: Mercieca Kevin at MESDC <kevin.a.mercieca@gov.mt>
Subject: Petting Farm at Ta'Quila Park

Dear Kevin

Further to our telephone conversation earlier today, as agreed I am emailing you with details of the concerns I expressed.

The Petting Farm is situated in Ta'Quali Park near Mdina Glass Factory.

There are a number of animals in undersized concrete pens with very little or no hay or straw. There was no visible pasture area for them to graze.

The llama pen had what looked like a pile of shredded paper. It's coat was very matted. The goats coats were also matted and stained. The animals all looked a bit sad and isolated. This was our

second visit the first being on New Year's Day- we were visiting the glass factory on both occasions and on each visit there was no sign of staff. The site is open to the public.

What caused me most concern was the condition of around 30 rabbits who were all contained undersized individual wire cages- the wire frames also formed the base of the cages which the rabbits had to lie or sit on. There was no flat solid floor or sign of any bedding. Their waste product fell through the gaps in the wire on to a tray below. The smell of waste was very strong and most of the cages had excess faeces that obviously been there for some time.

The rabbits, although seemingly in good enough condition and not under nourished appeared very bored and were frantically biting at the wire. It was difficult to see if there was enough food and water in the wire cages behind the ones that were visible.

In the lighter coloured rabbits you could see some urine and faecal staining on their feet and under bellies.

There are some very large Rex rabbits who are also contained in these undersized wire cages.

Whilst strangely, there are around three Rex's who are free to roam in a pleasant roomy contained area next door. It is possible they do some rotation but there does not appear to be any other facilities like this for the many other rabbits here.

I would be very grateful if you could take this further so that the welfare of all of these animals can be considered and their lives enhanced.

Best wishes

Jennifer Swan

Montebello Denis at MESDC

From: Farrugia Ivan at MESDC - AM
Sent: Thursday, 10 January 2019 19:39
To: Montebello Denis at MESDC
Cc: Montebello Noel at MESDC-AWPSD; Galea Herman at MESDC - AM
Subject:FW: Petting Farm at Ta'Quila Park

Mr. Montebello

Whilst thanking Ms. Swan for her visit to the Petting Farm, the management would like to express its views to the observations pointed out.

The pens of each animal has been designed much larger than the required minimum standards standard living spaces required. All permits were obtained from the related authorities

The pens at the farm are disinfected for hygiene purposes, while all shelters are cleaned every morning. All animals are fed twice daily with quality branded animal fodder and hay while all internal compounds are covered in saw dust for animal comfort. The shredded paper observed in the Llama's compound is confirmation that these animals are in fact taken care of. Shredded paper is purposely scattered on the concrete flooring as common practice, comfortable enough to keep the animal warm, whilst asleep. Concrete flooring is required to avoid damping of the straw/sawdust or shredded paper.

For peace of mind, automatic drinkers are fixed in each animal compound. These are supplied from a water tank purposely fixed inside the main building for animals to drink moderately cool water in summer and warmer water in winter. To offer some relief from summer heat and season flies, each compound is adorned with an industrial wall fan, operated all through the day and in intervals during the night with electricity timers to ease unwanted noise stress to animals.

While acknowledging the fact that the rabbits found in this area are directly under the care of a well renowned rabbit breeding NGO, it must be admitted that during the past few weeks, great effort has been invested in improving the rabbit zoo in general and cages alike. All new cages are larger than the minimum size required. As regards to the floor design, the steel spacing is purposely gauged to allow dirt to pass through into the trays below while still offering a comfortable flooring to the animals. Each rabbit has two cages of the same size one on the outside of the building and another in the inside. Internal cages offer a cosier environment during the winter spell and at night. In fact prior to night time, rabbits are moved inside the inner cages while a solid door is shut down for protection. The compound where the inner cages are held is further equipped with wall fans for better air circulation during the summer season. The Rabbits, like all other animals at the Petting Farm are also continuously supplied with fresh clean water in adequate temperature during all seasons. Animal feed is supplied inside next to the water supply.

We are surely in agreement on the need for all animals, possibly, to have adequate regular exercise. In fact, our horse, donkey and pony are walked to a larger paddock on the same farm premises and left to roam about freely every morning.

Veterinary services are carried out on regular and on-call basis, whilst surprise visits by Animal Welfare officials are occasionally conducted. The latest surprise inspection at the Rabbit Zoo was carried out this Monday 7th January 2019 at 08.00am which was concluded positively. Visits consist of, inspection of the physical aspect of the farm as well occasionally the taking of blood samples from the animals to monitor against unforeseen diseases or ill-health is conducted.

Cameras are installed at every corner of the petting farm which are monitored. May we finally thank Ms. Swan again for her interest and assure her that her observations have been noted and shall be acted upon where possible.

Regards

Ivan Farrugia
Director Embelishment Ambjent Malta

t +356 22928129 e ivan.farrugia@gov.mt

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TA' QALI PARK, TA' QALI

----- Forwarded message -----

From: "Montebello Denis at MESDC" <denis.montebello@gov.mt> Date: Tue, Jan 8, 2019 at 3:21 PM +0100

Subject: FW: Petting Farm at Ta'Quila Park

To: "Montebello Noel at MESDC-AWPSD" <noel.montebello@gov.mt>, "Galea Herman at MESDC - AM" <herman.galea@gov.mt>, "parks.msdec@gov.mt" <parks.msdec@gov.mt>

FYI .

Denis Montebello B.A., LL.D. Regent Building, No.2, Racecourse Street
Commissioner for Animal Welfare Marsa - MRS 1633 – MALTA

Tel.22928618

From: Montebello Denis at MESDC
Sent: 08 January 2019 10:54
To: Mercieca Kevin at MESDC; Jennifer swan Cc: Buhgiar Emanuel at MESDC

Subject: RE: Petting Farm at Ta'Quila Park Dear Mr. Mercieca

I am assuming that the Petting Farm is under the care and supervision of the PARKS AFFORESTATION, COUNTRYSIDE RESTORATION AND INITIATIVES DIRECTORATE and I am copying this reply to them and also to the Director of Animal Welfare so that they may take any urgent action they may deem opportune.

I would also appreciate to be informed of the actual official designated to take care of the farm so that I can also communicate directly with him and keep myself updated on the matter.

Regards

Denis Montebello B.A., LL.D. Regent Building, No.2, Racecourse Street
Commissioner for Animal Welfare Marsa - MRS 1633 – MALTA

Tel. 22928618

From: Mercieca Kevin at MESDC Sent: 08 January 2019 09:21
To: Jennifer swan; Montebello Denis at MESDC Cc: Buhagiar Emanuel at MESDC
Subject: RE: Petting Farm at Ta'Quila Park Dear Ms. Swan,
Good-morning.

Thanks for your email found hereunder.

In this email I am including the Commissioner for Animal Welfare Dr. Denis Montebello and I am copying Mr. Emanuel Buhagiar who works at the Office of the Commissioner for Animal Welfare.

Regards,
Kevin Mercieca Promotional Officer
Parl. Sec. For Agriculture, Fisheries & Animal Rights

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-----Original Message----- From: Jennifer swan
Sent: Friday, 04 January 2019 19:33 To: Mercieca Kevin at MESDC
Subject: Petting Farm at Ta'Quila Park

Dear Kevin

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Best wishes

Jennifer Swan

Montebello Denis at MESDC

From: Montebello Denis at MESDC
Sent: Thursday, 17 January 2019 18:28
To: Balbo Roberto Andrea at MESDC-VRD; Farrugia Ivan at MESDC - AM
Cc: Montebello Noel at MESDC-AWPSD; Galea Herman at MESDC - AM; Chetcuti Ganado Duncan at MESDC-VRD
Subject: RE: Petting Farm at Ta'Quila Park

Thanks Roberto.

The info is most appreciated.

I will be going to the place tomorrow around 11 a.m. to get first-hand knowledge of the situation.

I totally agree with you that most complaints have to be taken with a pinch of salt as the enthusiasm for animal care sometimes fogs up reality.

However, in cases where the upholders of animal welfare themselves are being held responsible for lack of respect for animals, then we must tread carefully and fully ensure that this is not the case and any shortcomings corrected immediately.

I personally believe that the best promotion that can be made to raise awareness for animal respect is through the way the Directorates keep the establishments in their charge. They should strive to make the home a model of optimal animal care, which by itself would raise the visiting public's awareness of what animals do really deserve and show the way of how a re-homing establishment should be run. Thereby, the establishment itself would become one of the most important tools for the promotion of animal welfare and, without the need of any fanfare, would itself raise the general public's awareness of the treatment animals really deserve.

I will be keeping you updated. Denis

Denis Montebello B.A., LL.D. Regent Building, No.2, Racecourse Street
Commissioner for Animal Welfare Marsa - MRS 1633 – MALTA
Tel. 22928618

From: Balbo Roberto Andrea at MESDC-VRD
Sent: 16 January 2019 19:07
To: Montebello Denis at MESDC; Farrugia Ivan at MESDC - AM
Cc: Montebello Noel at MESDC-AWPSD; Galea Herman at MESDC - AM; Chetcuti Ganado Duncan at MESDC-VRD
Subject: RE: Petting Farm at Ta'Quila Park

Commissioner for Animal Welfare

Dear Denis

Last Monday I sent Dr Chetcuti Ganado who is my Head of the Animal Welfare Unit, Focal point for Animal Welfare for the World Organization of Animal Health (OIE), EFSA and for the Animal Welfare Platform (copied) to meet the management and see where and if the problems exist as prompted by the public. So he is probably the most expert person we have on the island on AW.

In brief I can confirm that the situation in spite of criticism is more than ok. It is ok up to the point that we issued a license for the rabbit club to sell rabbits as the enclosures meet the minimum standards as laid down in SL 439.16 on the 8th of January.

The Parks management is really doing fine. They are putting a lot of efforts in keeping these premises as they should.

Let's start from the real problem, the premises are a bit of everything and nothing. There are some farm animals and some that are not used and or cannot be used for farming purposes. So This in reality is close to a zoo even though it is exempted under regulation 2 of SL 439.08 as there are few animals for approving the structure as a zoo.

In the EU there are no specific requirements –minimum caging conditions- for zoo animals and the majority of Countries(including Malta and VRD as competent authority)applies standards under the Swiss ordinance.

If we stick to the requirements of a zoo what happens is that almost for sure the Rabbit breeders will not agree. They need to sell animals at the end so they will probably object because they don't want to mix them and keeping them together.

In the meantime after discussing with Ivan, we believe that to continue the good work carried out by Herman, Ivan and their colleagues, we will provide some self-assessment checklists in order to facilitate their work

We will for sure issue certificates that certify that the well-being of the animal is respected. We will study if the caging system for the rabbits can be improved as well for the other animals. Next week these and literature for them to study, will be provided.

The real truth, is that very often we face (I include Noel's and my directorate) unfair criticism by people who do not have any scientific background to back their claims. Media (including social)seems to like these stories and we face problems.

I am more than happy to provide you with any other explanation you may need Best regards
Roberto

Roberto Andrea Balbo

Director (VRD) Veterinary Regulation
Veterinary and Phytosanitary Regulation Division

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From: Montebello Denis at MESDC <denis.montebello@gov.mt> Sent:
Monday, 14 January 2019 11:50

To: Farrugia Ivan at MESDC - AM <ivan.farrugia@gov.mt>

Cc: Montebello Noel at MESDC-AWPSD <noel.montebello@gov.mt>; Galea Herman at MESDC - AM

<herman.galea@gov.mt>; Balbo Roberto Andrea at MESDC-VRD <roberto-andrea.balbo@gov.mt>

Subject: RE: Petting Farm at Ta'Quila Park

Dear Mr. Farrugia,

Thank you for your prompt reply and detailed analysis.

Please give a reference as to where I can look up the Regulations providing the minimum living standards of animals, other than those regarding Dairy Farms (L.N.28 of 1976), or possibly sending me a copy. I am very interested to learn not only what the standards are but also when they were laid down since a revision might be needed.

Regards
Denis Montebello