

# **A data dump of suffering**

The EU's long-distance  
trade in farm animals  
exposed



# EXECUTIVE SUMMARY

A cache of unpublished records obtained in summer 2023 reveals **disturbing new evidence** of the extent and nature of the EU's trade in farm animals.

The data comprises official planning records - known as **animal journey logs** - relating to more than **180,000 consignments** of animals moving between EU countries and to non-EU countries in a 19-month period from **October 2021 – April 2023**. These records come from **TRACES** which is the European Commission's online management tool which notifies, certifies and monitors trade in live animals and animal products.

The new records, which relate to **cattle, pigs, sheep** and other species, contain granular details of each planned consignment, including the country, region and farm of origin, the number of animals being transported, details of transport methods – e.g. truck, ship or flight - and planned 'stopover' locations, e.g. control posts or exit points, as well as the expected length of journeys, dates (and times) of departures and arrivals, space allowances during transport, and details of the eventual destination, e.g. fattening farms, abattoirs, meat processing plants and breeding farms.

These records, together with publicly available Eurostat data reveal that over forty million pigs, cattle and sheep are transported annually on journeys between EU member states. In addition, around four million cattle, sheep and pigs are exported to non-EU countries including Türkiye, Serbia, destinations in the Middle East and North Africa, and even as far afield as **Kazakhstan** and **Uzbekistan** as well as **Brazil** and **Colombia**.

Particularly revealing is that the new data discloses which port, road exit point or airport was used on each journey to non-EU countries. This level of detail has given us a much more precise view of the routes taken for the export of live animals to non-EU countries.

In a painstaking forensic process we have pulled together data from these new records, **Eurostat, Google Maps, Ports.com and MarineTraffic**, a maritime analytics provider that provides real-time information on the movements of ships. This has allowed us to include detailed information in this report on the main strands of the EU's live animal trade, including the number of animals trucked and shipped on the main routes together with journey times and distances.



Several disturbing factors came to light as we examined the new records, including:

### Incomplete and deficient records

The EU does not have complete or accurate records of the number of animals or consignments exported to non-EU countries. **Millions of exported animals are absent from the TRACES records.** In particular, most exports to non-EU countries from Spain, Portugal, Ireland and Romania are missing. Our findings are supported by the EU Court of Auditors which states:

**“Journeys to non-EU countries are recorded in TRACES only when animals pass through another member state. The Commission acknowledges that it does not have a complete picture of the animal exports that take place by road. It is the same for other modes of transport. For exports by sea in 2018, the Commission estimated that TRACES recorded only 31.6% of the cattle and 3.5% of the sheep exported by livestock vessels from Croatia, Slovenia, Spain, France, Ireland, Portugal and Romania combined.”**

Such deficient record keeping in a matter of great public interest is totally irresponsible.

### Many journeys are much longer than would appear to be the case from official records

In reality many journeys are often much longer than indicated on the journey plans submitted ahead of the journey to Member State competent authorities. This is due to the use of assembly centres as places of departure, distribution centres as places of destination, long delays at the exit point as trucks cross from the EU to Türkiye, long delays in loading animals onto ships at ports, and lengthy onward journeys once animals are unloaded after arrival at ports in non-EU countries.

#### Use of assembly centres

The use of assembly centres is widespread. The new data reveals that over 60% of journeys start from assembly centres.

However, **an assembly centre is not the real start of a journey.** First, the animals will have been transported from a range of farms to an assembly centre where they are grouped together to form a consignment large enough to fill a truck. So, in addition to the travelling time shown on the journey plan, the animals will first have undergone transport from the farm to the assembly centre. That journey may have lasted all day with several stops and starts as the truck calls at a number of farms to collect animals.

### Assembly centre hopping

Under EU Regulation 1/2005 on the protection of animals during transport, after a specified amount of travelling time (which varies by species and age), animals must be unloaded and given 24 hours rest before the journey can resume. Some transporters circumvent the requirement for 24 hours rest by presenting an assembly centre as the journey's destination. There, under Regulation 1/2005, they can give the animals just six hours rest before reloading them and starting what is legally a new journey but which for the animals is in practical terms just a continuation of the previous journey.

**This practice is hard to spot as it will not show up on official data.** TRACES, Eurostat and journey log data will show animals being exported from, say, Germany to France. The data will show a separate transport from France to, say, Spain. This data will not reveal that these two journeys involved the same group of animals who were given just a six hour break at an assembly centre in France.

### Destinations which are not the real final destination

In some cases a final destination is given on the journey plan which may be a farm but from which the animals will, shortly after arrival, be sent on to other farms in the region.

### Lengthy delays at border with Türkiye

Lengthy delays are common at the border. During these delays animals are frequently kept on board the trucks, often in overcrowded conditions and with **insufficient water** and in summer in **very high temperatures** that can cause extreme suffering.

### Lengthy delays at ports

Most animals exported to non-EU countries face both a road and a sea journey. They are taken by road to a port. On arrival they may be kept for lengthy periods on stationary vehicles in blistering summer heat before finally being unloaded from the truck and loaded onto the ship. Animals suffer greatly during these protracted delays which can add many hours to the stated journey time.

### Onward journey after unloading in the port of arrival in the destination country

Animals may face lengthy onward journeys to a farm or a slaughterhouse after arrival in non-EU countries.



### EU exports are seeding factory farming across the globe

The EU exports animals to extremely distant locations including Brazil, Colombia, Mexico, Nigeria and Taiwan. For example, France, Denmark and the Netherlands have exported pigs by air to **Thailand, the Philippines, Singapore, Vietnam and Cambodia**. The new evidence shows over 100 consignments with live pigs leaving Denmark. These journeys often involve a long trip to the airport, followed by a long-haul flight to Latin America or Asia. The new data also reveal that eleven consignments of live pigs travelled to **Cameroon, Ghana, and Uganda**, mostly from France.

These animals are likely to be breeding sows that have been bred to produce very large litters e.g. 14 piglets or more per litter. Indeed, Denmark's pig breeding sector produces sows capable of having 17-18 piglets per litter.<sup>1</sup>

Large litter size is a significant cause of multiple welfare problems for both sows and piglets, including higher piglet mortality as well as prolonged births. Very large litters have contributed to the use of farrowing crates to confine sows. Moreover, in large litters, the number of piglets born alive typically is more than the number of functional teats.<sup>2</sup> This has led to the use of nurse sows and artificial rearing systems to deal with surplus piglets, both of which entail serious welfare problems. By exporting breeding sows that have been genetically selected for very large litters, the EU is in effect exporting its inhumane factory farming model to other parts of the world.





### Transport of unweaned calves

The report also highlights one of the cruellest aspects of transport within the EU which is the transport of unweaned calves on very long journeys. Most of these calves are the unwanted male calves from the dairy sector. These tiny animals, often just two to three weeks of age, are frail and quite unsuited for transport. They do not yet eat solid food and their immune system is not fully developed. They depend on milk or milk replacer (powdered milk mixed with water) for nutrition. However, it is not possible to give calves milk replacer while they are on board a truck. And so they are **driven on long journeys without feed and often without water**, resulting in hunger, thirst and increased vulnerability to disease.

The EU is in effect exporting its inhumane factory farming model to other parts of the world.



### Far-reaching strengthening of EU law on animal transport is needed

We urge the Commission to propose, and the Member States and the Parliament to adopt the following reforms to Council Regulation 1/2005 on the protection of animals during transport:

- A ban on the export of live farm animals to non-EU countries** except to countries that are geographically close to the EU and that have legislation on the protection of animals during transport and slaughter that is at least as strong as that of the EU.
- A prohibition on the transport of unweaned animals:** Unweaned animals should not be transported. They suffer greatly during transport.
- Maximum journey time of eight hours to slaughter or for fattening.**
- For poultry, rabbits and end of production animals, the maximum journey time should be four hours.**
- Pregnant animals:** animals for whom 40% or more of the expected gestation period has already passed must not be transported.
- Temperature limits:** animal transports should not be approved when external temperatures are forecast to be below 5 °C or above 25 °C on any section of the route.
- Standards for live fish transport:** licensing of vehicles, training, planning and monitoring of journeys to ensure water quality, and a clean, safe and calm environment to avoid injury and distress; ensure fitness for transport and health and welfare monitoring pre, during and post-transport; setting maximum and species-specific starvation periods.



## INTRODUCTION

**Each year millions of cattle, sheep and pigs are transported long distances between EU Member States. Millions more are exported to non-EU countries including Türkiye, destinations in the Middle East and North Africa and even as far as Kazakhstan and Uzbekistan.**

In the period 2017-2021 on average around **forty million pigs, cattle and sheep were transported** each year between EU Member States. In addition, almost **four million cattle, sheep, and pigs** were on average exported each year to non-EU countries during this period. ***Table 1 sets out these figures in more detail.***



A cache of unpublished records obtained in summer 2023 reveals new evidence of the extent and nature of the EU's trade in terrestrial farm animals, with data detailing both planned and actual journeys<sup>3</sup> for animals due to be trucked, shipped and flown across Europe and internationally in journeys lasting days, weeks or even longer.

The data comprises official planning records - known as animal journey logs - relating to more than 180,000 consignments of livestock moving between EU countries and internationally involving a journey time of 8 hours or more in a 19-month period from October 2021 – April 2023. Such journeys are classified by the EU as "long distance", and are the subject of a current EU review of animal welfare regulations.

The raw records, which relate to cattle, pigs, sheep and other species, contain granular details of each planned consignment, including the country, region and farm of origin, the number of animals being transported, details of transport methods – e.g. truck, ship or flight - and planned 'stopover' locations, e.g. control posts or exit points, as well as the expected length of journeys, dates (and times) of departures and arrivals, space allowances during transport, and details of the eventual destination, e.g. fattening farms, company abattoirs, meat processing plants and breeding farms.

Animals are transported on long journeys for a variety of reasons. Some are being sent to distant slaughterhouses. Others are being transported for further fattening, such as young calves being sent to veal farms and weaned pigs being sent from northern to southern or eastern Europe to be raised until they are ready for slaughter. Others are breeding animals being sent to farms where they will be used to produce offspring.

Animals often suffer greatly during long journeys. Packed into overcrowded trucks, they become increasingly exhausted, dehydrated and stressed as the long journeys wear on. Some get injured and collapse onto the floor of the truck, where they risk being trampled by their companions. In the worst cases, many die – drowning when ships capsize or succumbing to heat stroke when trucks get stuck for hours or even days at border crossings. For example, over 14,000 sheep drowned when a ship transporting them from Romania to Saudi Arabia capsized in the Black Sea in 2019.<sup>4</sup>



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**Animals often suffer greatly during long journeys. Packed into overcrowded trucks, they become increasingly exhausted.**

An estimated 54,000 tonnes of live fish were transported between EU Member States (in 2019), with 75% being trout, carp, eel and bluefin tuna, thought to involve tens of millions of individual animals.<sup>5</sup> In addition, 5484 tonnes of live fish were imported into the EU in 2019, of which Bluefin tuna accounted for 50%. In 2019, 3760 tonnes of live fish were exported to non-EU countries, of which carp accounted for 40%.<sup>6</sup>

There are limitations to data available for live fish transport. There are only partial records of cross-border trade and there is no data available for transport within individual Member States. Small businesses may be exempt from reporting and in other cases, confidentiality may lead to omissions of data. Additionally, live transport of fish is reported by weight (in tonnes) and not by head, and due to the variation of species and sizes of fish. This makes it difficult to accurately estimate the scale of individual live fish transport.<sup>7 8</sup>

**TABLE 1. Average number of animals transported annually in 2017-2021 (i) between EU Member States and (ii) from EU to non-EU countries**

Species	Average number of animals transported annually in 2017-2021 between EU Member States: In millions	Average number of animals transported annually in 2017-2021 from EU to non-EU countries: in millions*
Pigs	34.9	0.5
Cattle	4.3	1.0
Sheep	2.9	2.9

Source: European Court of Auditors, 2023

(\* these figures include a small number of animals imported by EU from non-EU countries)



## Journey times permitted by Regulation 1/2005

Council Regulation 1/2005 on the protection of animals during transport provides that journeys shall not exceed eight hours, after which the animals must be unloaded and given food, water and at least 24 hours rest before the journey can continue.

At first sight this appears welcome. However, the Regulation goes on to state that where certain additional vehicle standards (which are not particularly demanding) are met, animals can be transported for much longer periods. Cattle and sheep can be transported for 28 hours (with a rest of at least one hour after 14 hours), after which they must be unloaded and given food, water and at least 24 hours rest. If the additional requirements are met, pigs and horses can be transported for 24 hours, after which they must be unloaded and given food, water and at least 24 hours rest. If the additional requirements are met, unweaned animals can be transported for 18 hours (with a rest of at least one hour after 9 hours), after which they must be unloaded and given food, water and at least 24 hours rest. This pattern of travel and rest can be repeated indefinitely. There is clear evidence that pigs<sup>9</sup>, sheep<sup>10</sup>, calves and other cattle<sup>11</sup> suffer from hunger and thirst during the period(s) of food or water deprivation that will occur during transport.

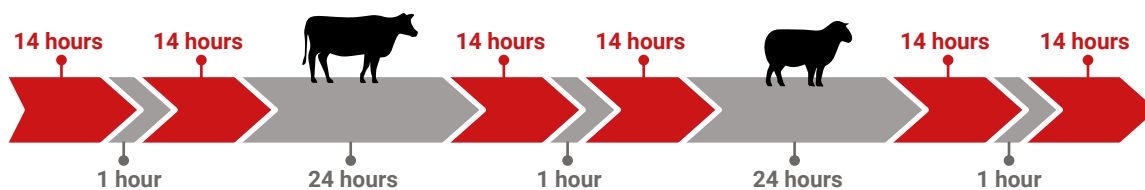
*These cycles of permitted travel and required rest are set out in Figures 1-3.*

## Suffering is inherent in long journeys even when carried out in compliance with the law

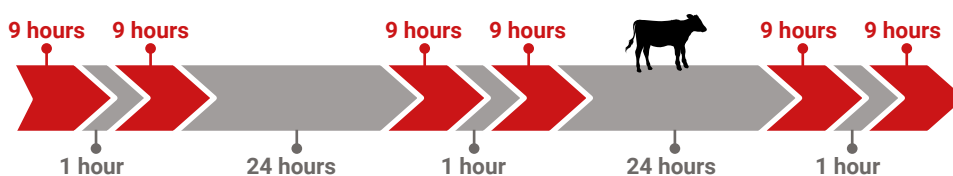
Even when carried out in compliance with Council Regulation 1/2005 on the protection of animals during transport, long journeys often entail substantial suffering. For example:

- unfamiliar animals are frequently loaded into the same compartment of a truck or livestock vessel. This can lead to aggression while a hierarchy is being established.<sup>12 13 14</sup>
- loading and unloading are often stressful processes.
- during long road journeys animals can experience motion sickness, stress and/or fatigue due to acceleration, braking, stopping, cornering, gear changing, vibrations and uneven road surfaces.<sup>15 16 17</sup>
- Regulation 1/2005 permits animals to be transported from one end of Europe to another and even to distant non-EU countries. The European Food Safety Authority (EFSA) recognises that such long journeys entail serious welfare challenges, stating that the severity of hunger, thirst and fatigue (due to motion stress and resting problems), will increase over time.<sup>18 19 20</sup> Accordingly EFSA recommends that "for the benefit of animal welfare, the journey duration should be kept to a minimum".
- Regulation 1/2005 permits animals to be transported on long journeys without sufficient rest, feed, water, floor space and height and in high temperatures.<sup>21 22 23</sup>

**FIGURE 1: cycles of permitted travel and required rest for adult cattle and sheep**



**FIGURE 2: cycles of permitted travel and required rest for unweaned animals**



**FIGURE 3: cycles of permitted travel and required rest for pigs**



### KEY

- Transport
- Rest



## Due to poor enforcement, many journeys flout the requirements of Regulation 1/2005

The fact that compliance with, and enforcement of, Regulation 1/2005 is poor is recognised by the European Commission which said in its 2022 *Fitness Check of EU animal welfare legislation*:

**“compliance is still very challenging in areas such as animal transport and in particular on long journeys, transport of young or pregnant animals and exports of livestock”<sup>24</sup>**

Audits by the European Commission and investigations by animal welfare organisations show that for over thirty years enforcement of EU law on the protection of animals during transport has been poor.

The main breaches of EU law that are regularly observed include:

- The transport of unfit animals
- Stocking densities sometimes exceed the maximum densities permitted by Regulation 1/2005
- Animals are frequently given too little headroom
- The Regulation's maximum permitted temperature is often exceeded
- The Regulation's requirements on feed and water are frequently breached. In some cases water tanks are empty or the drinking devices do not work or they are the wrong type for the species being carried or are positioned in such a way that the animals cannot reach them
- The Regulation's requirements on the provision of rest are often ignored
- In some cases insufficient bedding is provided; in other cases it becomes filthy in the later stages of the journey
- The transport of unweaned animals on journeys over nine hours without the animals being fed
- These breaches – often by the same transport companies - have been occurring for many years. While some Member States (MS) have improved enforcement, many continue to make little serious attempt to enforce Regulation 1/2005.

**For over thirty years enforcement of EU law on the protection of animals during transport has been poor.**

The EU Regulation on official controls (2017/625) provides strong enforcement mechanisms which are expressly designed to prevent recurrence of breaches but these are poorly used by the MS.

A key problem is that many long journeys involve several MS. The journey may pass through a number of MS. The MS of departure which must approve the journey log may be different from the MS that granted the transporter's authorisation. Yet another MS may have granted the certificate of approval for the vehicle, while a different MS may have granted the driver's certificate of competence.

The involvement of several MS complicates enforcement. The official controls Regulation contains very helpful provisions requiring a MS that finds a breach of Regulation 1/2005 to notify the MS that granted the transporter's authorisation, the MS of departure, and those that granted vehicle and driver certificates. The purpose is to prevent recurrence of these breaches. However, the required notifications are rarely given in a systematic way and even where they are, the MSs which receive the information rarely act on it in such a way as to prevent recurrence of these breaches. As a result the same breaches are repeated year after year.

## EU legislation on animal transport is irrelevant and unenforceable for fish

While Regulation 1/2005 includes the transport of aquatic species, its application to these species is much less detailed than for terrestrial animals. It does not contain any species-specific provisions or journey time limits for fish. For the reasons outlined below, the Regulation is not sufficient to protect farmed fish during transport.

### 1. Lacks relevant provisions.

Many important parts of fish welfare are absent from the Regulation such as: the monitoring and maintenance of water quality during transport, feed withdrawal times before transport and acclimatisation before unloading.<sup>25</sup>

Starvation periods to slow metabolism and preserve water quality are not controlled by the Regulation. If not carefully managed, this process can cause suffering due to extended starvation periods.

### 2. Difficult to implement.

The Commission Report to Parliament and Council of 2011 on the impact of Regulation 1/2005 (EC, 2011b) states that the ambiguous rules mean that it is hard to implement the Regulation for farmed fish. This leads to different interpretations of the Regulation by different operators.



# THE DATA'S DISCLOSURES

A key element emerging from the new data is the **sheer length** of the journeys

## Long journeys, extreme hours

A key element emerging from the new data is the sheer length of the journeys. Cattle and sheep being sent by road and sea to the Middle East and North Africa often have to endure journeys of up to seven days or more. For animals exported to Uzbekistan and Kazakhstan, the protracted road journeys, spanning two continents, can take one to three weeks.

Even journeys within the EU can be excessive. Tiny unweaned calves, still fragile and with as yet weak immune systems, are shipped and trucked on long journeys across Europe. Calves are trucked from Ireland, Lithuania, Poland, Czechia, Slovakia and Hungary to Italy and Spain on journeys ranging from 46-72 hours. Calves pour into the Netherlands from Ireland, Estonia, Latvia, Lithuania and Poland on journeys of over 50 hours to feed the Dutch veal industry.

Pigs are notoriously bad travellers and can suffer from travel sickness but the millions sent annually from Netherlands and Denmark to southern and eastern Europe face being hauled for up to 60 hours and in some cases even longer.

**New data reveals that over 60% of journeys start from assembly centres. However, an assembly centre is not the real start of a journey.**

## Use of assembly centres

The new data has exposed one of the 'tricks of the trade' used to extend travelling times. Many journeys are in practice significantly longer than the travelling time stated in the journey log. This is due to the widespread use of assembly centres. The new data reveals that over 60% of journeys start from assembly centres. However, an assembly centre is not the real start of a journey. First, the animals will have been transported from a range of farms to an assembly centre where they are grouped together to form a consignment large enough to fill a truck. So, in addition to the travelling time shown on the journey log, the animals will first have undergone a journey from the farm to the assembly centre. That journey may have lasted all day with several stops and starts as the truck calls at a number of farms to collect animals.

The use of assembly centres is very attractive for transporters as it enables them to in effect extend the maximum permitted travelling time.

Regulation 1/2005 provides that normally animals must have been accommodated at the place of departure for at least 48 hours before the journey may begin. However, the Regulation provides that where an assembly centre is the 'place of departure' the animals only have to be accommodated there for six hours prior to the time of departure.

This means that animals can be picked up from multiple farms, driven to an assembly centre, given just six hours' rest and then, in the case of cattle and sheep, they can be taken on a journey of 28 hours before they are finally unloaded for rest, feed and water (this time is 24 hours for pigs and 18 hours for unweaned animals). Indeed, if the journey from the farm to the assembly centre is less than 100 km the Regulation provides that the animals do not have to be rested at all at the assembly centre before the journey can continue. The length of journey from the farm to an assembly centre is often not negligible; it may last many hours, particularly for those animals loaded onto the truck at the first few farms at which it calls.

## Assembly centre hopping

As indicated above, after a specified amount of travelling time, animals must be unloaded and given 24 hours rest before the journey can resume. Some transporters circumvent the requirement for 24 hours rest by presenting an assembly centre as the journey's destination. There they can give the animals just six hours rest before reloading them and starting what is legally a new journey but which for the animals is in practical terms just a continuation of the previous journey.

This practice is hard to spot as it will not show up on official data. TRACES, Eurostat and journey logs data will show animals being exported from, say, Germany to France. The data will show a separate transport from France to, say, Spain. The data will not reveal that these journeys involved the same group of animals who were given just a six hour break at an assembly centre in France.

## Many journeys much longer than appears from official data

As indicated above, the use of assembly centres as the place of departure disguises the fact that animals may have undergone a lengthy journey from the farm of origin to the assembly centre. Moreover, the place of destination as stated in the journey plan may be a distribution centre rather than the real final destination. Animals being transported for fattening may be sent to a distribution centre from which, just a few hours later, they are onward transported to the farms where they will be fattened.

In addition, as explained below, animals being exported by sea to non-EU countries may be subject to lengthy delays at the port of departure before being loaded onto the ship. Moreover, the port of arrival in the destination country will not be the final destination. After unloading from the ship, the animals will be transported by road to a slaughterhouse or to a farm or feedlot where they will be fattened.

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## Serious deficiencies in EU data on animal transport

The previously unpublished data referred to earlier comes from TRACES which is the European Commission's online management tool which notifies, certifies and monitors trade in live animals and animal products. Much of the information on TRACES regarding animal transport comes from the journey logs which organisers must complete and submit to the competent authority of the Member State of departure for journeys over eight hours between Member States or to non-EU countries.

Another important source of data is Eurostat which provides statistics on the number of live animals transported between Member States or to non-EU countries.

The process of compiling this report has revealed a serious mismatch between some of Eurostat's and TRACES' data. For example, the previously unpublished TRACES data reveals that sheep are transported from France to Iran on massive road journeys of over 5,000 km. However, these journeys do not appear in Eurostat.

TRACES data does not include many of the long sea journeys carrying live animals from Romania and Spain to the Middle East and North Africa nor the trade in cattle and sheep from Portugal to Israel. The protracted sea journeys carrying cattle from Ireland to Libya are also absent from TRACES.

This unsatisfactory situation was highlighted by the European Court of Auditors in its 2023 report which states:

**“Journeys to non-EU countries are recorded in TRACES only when animals pass through another member state. The Commission acknowledges that it does not have a complete picture of the animal exports that take place by road. It is the same for other modes of transport. For exports by sea in 2018, the Commission estimated that TRACES recorded only 31.6% of the cattle and 3.5% of the sheep exported by livestock vessels from Croatia, Slovenia, Spain, France, Ireland, Portugal and Romania combined.”**





# A: Export of animals to non-EU countries

Each year around three million sheep and goats and one million cattle are exported from the EU to non-EU countries. Some of the journeys are by road, while others are by sea, though even these will first entail a road journey from the farm to the port.

## 1 Export of cattle and sheep from the EU to the Middle East and North Africa

Map 1 shows key routes for cattle and sheep exported to the Middle East and North Africa.

In the 19 month period from October 2021 to April 2023 the EU exported **1,014,637 cattle** and **4,048,381 sheep** to the Middle East and North Africa. Some animals are being exported for immediate slaughter, others for slaughter after a period of fattening. A smaller number are being exported for breeding. Tables 2 & 3 below provide details of live exports of cattle and sheep respectively from the EU to the Middle East and North Africa. Except where stated to be a road journey, journey times and lengths given in Tables 2 & 3 only refer to the sea stage of the journey.

Most EU exports to the Middle East and North Africa involve lengthy sea journeys. The duration of journeys is highly variable and can extend from days to several weeks for the same route. Age of the vessel, type of engine and weather conditions influence journey duration. Currently around 60-80 livestock vessels are transporting live animals from the EU to non-EU countries, and each vessel has very different engines, sizes, ages etc.<sup>26</sup> Accordingly, each journey is different depending on the vessel used.

A 2021 report by Animal Welfare Foundation analyses the state of the vessels used to export animals from the EU. The average EU-approved livestock carrier is a 41-year old vessel, polluted by asbestos, PCBs (highly carcinogenic chemical compounds) and other toxic substances, built as a general cargo carrier and converted for livestock transport at the age of 29. She is 99 metres in length with a gross tonnage of 5,261.

She flies a flag of convenience listed on the blacklist of the Memorandum of Paris and is classed by a non-IACS (International Association of Classification) classification society. She has been detained five times. In the past two years, she has been reported by Port State Controls with 32 deficiencies in particular with regard to certificates and documentation, safety of navigation, fire safety, Maritime Labour Convention 2006, life-saving appliances, working and living conditions, pollution prevention, water/weathertight conditions, propulsion and auxiliary machinery, emergency systems, radio communications, structural conditions and ISM (International Safety Management). To put it simply, the average EU-approved livestock carrier can be described as a substandard ship.

### A note on the methodology for producing the figures used in Tables 2 & 3

Data on the number of animals are mainly taken from Eurostat as this is a publicly available source of information. Data on road journey times (days and hours) and the percentage of journeys starting at assembly centres are derived from the previously unpublished data which is not publicly available. The figures on road journey distances (kilometers) are calculated from Google maps.

The figures for sea journeys distances are derived from Ports.com. Initially we calculated sea journey times from this source, but it became clear that these were often substantially underestimating the actual times taken by livestock vessels. Accordingly, we have used specific figures from Marine Traffic for actual sea journeys carried out recently by livestock vessels.

### Table 2 notes

- <sup>a</sup> Unless otherwise stated, the numbers of cattle exported are from Eurostat. NB also: Column 2, total number of cattle exported from a particular Member State, may show an overall total greater than the sum of the individual routes shown from that Member State as this Table only shows selected routes.
- <sup>b</sup> Except where otherwise stated, journey duration is calculated from actual live export journey data at Marine Traffic, mostly in 2023.
- <sup>c</sup> Distances by sea are calculated using Ports.com and by road using Google Maps.
- <sup>d</sup> A hyphen indicates that this figure is not available.
- <sup>e</sup> Data source: TRACES
- <sup>f</sup> Data source: TRACES, showing average journey duration and Google Maps, showing average journey length.
- <sup>g</sup> In recent years, Ireland has not exported cattle directly to Lebanon but sends them by sea and land journeys to be shipped to Lebanon from Rasa (Croatia) or Tarragona (Spain). The details of this journey are as follows:

Leg of journey	Distance (km)	Data source	Journey duration	Data source
Dublin to Cherbourg	627	Ports.com	18 hours	Journey log
Cherbourg to Tarragona (via rest stop)	1,584	Google Maps	44 hours	Journey log
Tarragona to Beirut	3,566	Ports.com	7 days & 8 hours	Marine Traffic

- <sup>h</sup> Road journey calculated using Google Maps.
- <sup>i</sup> Journey duration and length calculated using Google Maps.

TABLE 2: Export of live cattle from selected EU Member States to Middle East and North Africa. October 2021-April 2023

Exporting Member State	Total number of cattle exported <sup>a</sup>	Sea journey time <sup>b</sup>	Sea journey length (km) <sup>c</sup>	Percentage of journeys starting from assembly centres <sup>d</sup>
<b>Croatia</b>	<b>118,988</b>			
Croatia to Israel	62,980	7 days	3,072	-
Croatia to Lebanon	26,071	5 days & 4 hours	2,992	0%
Croatia to Egypt	19,546	5 days & 15 hours	2,815	-
Croatia to Libya	8,269	3 days & 16 hours	2,120	0%
<b>Czechia</b>	<b>7,182 <sup>e</sup></b>			
Czechia to Algeria	659	From 1 day & 9 hours to 4 days & 23 hours	995	68%
Czechia to Libya	367	4 days & 11 hours	1,807	89%
Czechia to Lebanon	2,719	5 days & 15 hours	2,992	45%
<b>France</b>	<b>151,929</b>			
France to Egypt	3,733	6 days & 15 hours	3,711	-
France to Lebanon	1,846	7 days & 8 hours	3,566	49%
France to Libya	1,002	4 days & 11 hours	2,478	84%
France to Israel	2,922	8 days & 9 hours	3,698	-
France to Morocco	3,922	2 days & 15 hours <sup>f</sup>	2,146 <sup>f</sup>	56%
France to Tunisia	11,944	1 day & 23 hours	1,172	100%
France to Algeria	126,560	From 1 day & 9 hours to 4 days & 23 hours	995	-
<b>Germany</b>	<b>12,586</b>			
Germany to Egypt	5,591	6 days & 20 hours	2,831	82%
Germany to Morocco	6,573	4 days & 8 hours <sup>f</sup>	3,064 <sup>f</sup>	100%
<b>Hungary</b>	<b>65,757 <sup>e</sup></b>			
Hungary to Egypt	14,579	5 days & 15 hours	2,815	-
Hungary to Israel	30,181	6 days & 15 hours	3,072	-
Hungary to Lebanon	9,530	5 days & 4 hours	2,992	-
Hungary to Libya	8,053	3 days & 16 hours	2,120	-
<b>Ireland</b>	<b>18,433</b>			
Ireland to Libya	10,828	9 days & 15 hours	5,111	-
Ireland to Jordan	5,126	15 days & 7 hours	7,328	-
Ireland to Egypt	1,878	11 days & 20 hours	6,446	-
Ireland to Lebanon	601	9 days & 22 hours <sup>g</sup>	5,777 <sup>g</sup>	-
<b>Poland</b>	<b>5,089 <sup>e</sup></b>			
Poland to Iran (road journey)	244	5 days & 6 hours	5,071	-
Poland to Lebanon	4,845	5 days & 15 hours	3,011	76%
<b>Portugal</b>	<b>220,480</b>			
Portugal to Israel	220,305	7 days & 18 hours to 9 days & 18 hours	4,742	-
Portugal to Morocco	175	1 day & 20 hours <sup>f</sup>	916 <sup>f</sup>	0%
<b>Romania</b>	<b>162,975</b>			
Romania to Libya	7,551	4 days & 19 hrs	2,692	67%
Romania to Israel	111,399	4 days & 8 hours	2,461	-
Romania to Jordan	33,710	5 days & 8 hours	3,152	-
Romania to Saudi Arabia	5,633	8 days & 2 hours	3,941	-
Romania to Iraq (road journey) <sup>h</sup>	1,800	3 days	3,092	-
Romania to Egypt	1,348	6 days & 14 hours	2,383	-
<b>Slovakia</b>	<b>573 <sup>e</sup></b>			
Slovakia to Lebanon	452	5 days & 15 hours	3,011	79%
<b>Slovenia</b>	<b>45,190</b>			
Slovenia to Lebanon	27,533	5 days & 15 hours	3,011	0%
Slovenia to Libya	5,470	3 days & 22 hours	2,000	100%
Slovenia to Israel	10,098	7 days & 8 hours	3,090	-
<b>Spain</b>	<b>192,770</b>			
Spain to Lebanon	34,306	7 days & 22 hours	3,587	0%
Spain to Libya	44,803	4 days & 11 hours	1,807	0%
Spain to Morocco	58,682	8 hours <sup>i</sup>	722 <sup>i</sup>	-
Spain to Egypt	39,420	7 days & 14 hours	3,592	-
Spain to Algeria	4,705	17 hours	279	-

**TABLE 3: Export of live sheep from selected EU Member States to Middle East and North Africa. October 2021-April 2023**

Exporting Member State	Total number of sheep exported <sup>a</sup>	Sea journey time <sup>b</sup>	Sea journey length (km) <sup>c</sup>	Percentage of journeys starting from assembly centres <sup>d</sup>
<b>France</b>	<b>31,854 <sup>e</sup></b>			
France to Iran (road journey)	3,899 <sup>f</sup>	7 days & 19 hours <sup>f</sup>	6,188	100%
France to Lebanon	5,869	7 days & 8 hours	3,566	96%
<b>Hungary</b>	<b>8,577<sup>f</sup></b>			
Hungary to Israel	6,490	6 days and 15 hours	3,072	-
Hungary to Lebanon	2,087	5 days & 4 hours	2,992	-
<b>Poland</b>	<b>1,830</b>			
Poland to Iran (road journey)	1,830	5 days & 6 hours	5,071	100%
<b>Portugal</b>	<b>568,809</b>			
Portugal to Israel	568,809	7 days & 18 hours to 9 days & 18 hours	4,742	-
<b>Romania</b>	<b>2,359,323</b>			
Romania to Jordan	1,462,673	5 days & 8 hours	3,152	-
Romania to Saudi Arabia	831,196	8 days & 2 hours	3,941	-
Romania to Israel	17,984	4 days & 8 hours	2,461	-
Romania to Kuwait	4,400	13 days & 19 hours <sup>g</sup> 17 days & 20 hours <sup>h</sup>	9,223	-
Romania to Libya	38,000	4 days & 19 hours	2,692	67%
<b>Spain</b>	<b>971,610</b>			
Spain to Jordan	645,391	8 days & 15 hours to 10 days	4,291	-
Spain to Lebanon	20,349	7 days & 22 hours	3,587	0%
Spain to Libya	76,671	4 days & 11 hours	1,807	-
Spain to Morocco	11,914	8 hours <sup>i</sup>	722	-
Spain to Saudi Arabia	217,000	Direct: 18 days & 10 hours (Cartagena to Jeddah)	5,080	-
		Indirect: 21 days & 9 hours from Cartagena to Jeddah via Aqaba in Jordan	5,348	

**Table 3 notes**

- <sup>a</sup> Unless otherwise stated, the numbers of sheep exported are from Eurostat. NB also: Column 2, total number of sheep exported from a particular Member State, may show an overall total greater than the sum of the individual routes shown from that Member State as this Table only shows selected routes.
- <sup>b</sup> Except where otherwise stated, journey duration is calculated from actual live export journey data at Marine Traffic, mostly in 2023.
- <sup>c</sup> Distances by sea are calculated using Ports.com and by road using Google Maps.
- <sup>d</sup> A hyphen indicates that this figure is not available.
- <sup>e</sup> Source Eurostat and TRACES.
- <sup>f</sup> Source – TRACES.
- <sup>g</sup> Journey duration estimated from www.ports.com as recent data from Marine Traffic for the Romania-Kuwait journey was not available. However an example of an actual journey is shown in note h:
- <sup>h</sup> This journey took place from 14 July – 1 August 2019. The ship carried 66,000 sheep in the summer heat. It stopped at Jeddah (Saudi Arabia); Port Jebel Ali (United Arab Emirates); Hamad (Qatar); Muscat (Oman) and Shuwaikh (Kuwait).
- <sup>i</sup> Journey duration and length calculated using Google Maps.

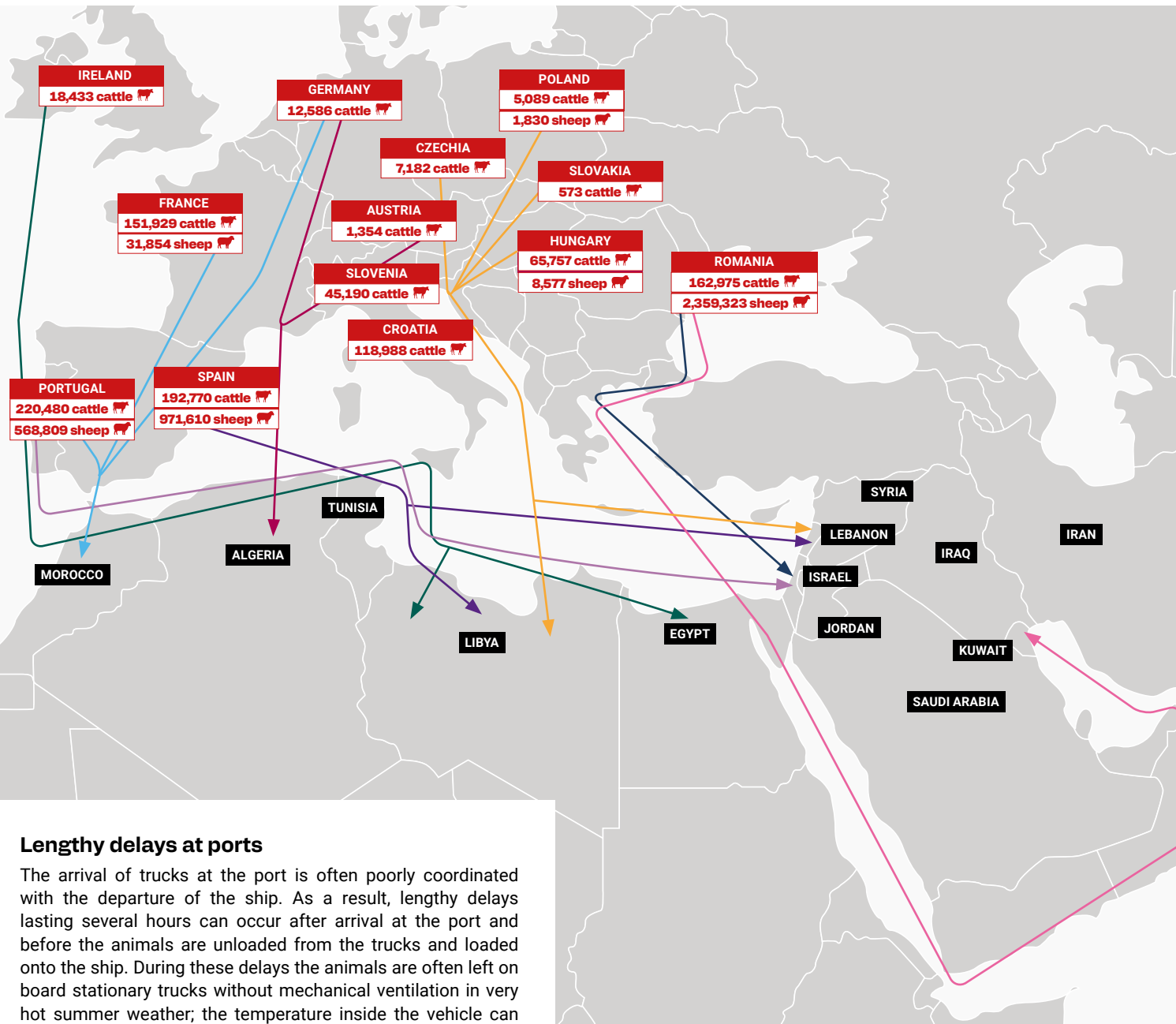
Cattle and sheep are taken by road to a sea port. There they are unloaded from the truck and loaded onto a livestock vessel. EFSA states that the sea journey can last from 5 to 8 days but may be as long as several weeks.<sup>27</sup> Most cattle and sheep sea journeys leave the EU from Croatia, Slovenia, Spain, France, Ireland, Portugal and Romania.

Most livestock vessels have not been purpose built for carrying animals; usually they have been converted from ships previously used for other purposes such as car transporters. The biggest livestock vessels can transport around 18,000 cattle or 75,000 sheep.<sup>28 29</sup>

EFSA points out that “animals transported in livestock vessels usually experience very long journeys, from the farm of origin to the port, the voyage in the vessels, and road transport to the final destination, including potential long waits to be loaded and unloaded from the vessel”.<sup>30 31</sup>



MAP 1. Cattle and sheep exports to Middle East and North Africa\*



### Lengthy delays at ports

The arrival of trucks at the port is often poorly coordinated with the departure of the ship. As a result, lengthy delays lasting several hours can occur after arrival at the port and before the animals are unloaded from the trucks and loaded onto the ship. During these delays the animals are often left on board stationary trucks without mechanical ventilation in very hot summer weather; the temperature inside the vehicle can increase rapidly leading to heat stress.<sup>32</sup>

### Inspection of animals to ensure they are fit to continue their journey

Competent authorities (CAs) are often not properly carrying out the requirement in Article 20.2 of Regulation 1/2005 that they must inspect animals before loading onto livestock vessels to ensure that they are fit to continue their journey. A 2020 European Commission report on transport by sea shows that "Checking the fitness of the animals is generally a weak point" and is not being properly carried out.<sup>33</sup> The report adds that records of these checks "are in many cases poor or do not exist".

### Loading onto livestock vessels

The handling of animals during loading is often rough with sticks and electric prods sometimes being used. Loading ramps are too steep in some cases leading to animals struggling or even falling down.

### The sea journey

EFSA's 2022 reports on the transport of cattle and sheep highlight the following problems that often arise during long sea journeys:

**Heat stress:** High stocking densities, ventilation difficulties, solar radiation and high environmental temperatures (as often these journeys are done in the warm months of the year) may result in high temperatures inside the vessels.

**Noxious gases:** The accumulation of manure during the journey, especially in poorly ventilated pens, leads to increased levels of noxious gases, mostly ammonia, carbon dioxide, and hydrogen sulphide.

**Motion stress:** EFSA points out that "the duration of the journeys mean that rough sea cannot be prevented".

**Starvation:** Starvation due to inappetence is an important factor in the welfare of sheep transported in livestock vessels.



## Once loaded onto the ship the animals enter a legal black hole

There is no-one who has clear legal responsibility for ensuring the animals' welfare during these journeys. The Commission has stressed that organisers must appoint an authorised transporter to be responsible for the welfare of the animals during the sea stage of export journeys.<sup>34 35</sup> In practice, organisers rarely appoint an authorised transporter for the sea journey, nor do MS insist on the appointment of such a transporter.

As a result, **no-one is present on the ship with clear legal responsibility for ensuring welfare.** This results in serious problems. A report by the Animal Welfare Foundation<sup>36</sup> (and reports from Australian voyages) show that during sea journeys water troughs are sometimes dirty and the bedding gradually becomes very wet and soiled; in some cases animals are covered in faeces. Space allowances and pen heights can be too low. Ventilation is often inadequate and temperatures and humidity too high.

EU law does not require a veterinarian to accompany animals during the long sea journeys to the Middle East and North Africa. Accordingly, **there is no-one with appropriate expertise on board the ship able to treat diseased or injured animals.**

## The journey continues

Even when the animals reach the port of arrival in the Middle East or North Africa, their long journey is not at an end. They are unloaded from the ship and then re-loaded onto a truck and driven to a slaughterhouse or a farm which may be a considerable distance from the port. Vehicles in this region are often of poor quality and have not been purpose-built to carry animals.

EFSA's 2022 reports on cattle and sheep add that mean summer temperatures for animals at their destination in many non-EU countries are likely to be in the region of 35–40°C (daily maximum), i.e. well above the upper critical temperature for livestock. This is likely to lead to heat stress.

## Most live exports ignore the Court of Justice ruling on this trade

In the *Zuchtvieh* case (C-424/13) the Court of Justice of the EU ruled that the provisions of Regulation 1/2005 continue to apply even when a consignment has left the EU; they apply all the way until the destination in the non-EU country is reached. The Member States, transporters and the Commission regularly ignore the Court's ruling.

The *Zuchtvieh* case concerned the transport of a consignment of cattle from Germany to Uzbekistan i.e. a very long road journey. Nonetheless, the wording of the Court's ruling in the *Zuchtvieh* case means that live exports by sea must also comply with Regulation 1/2005 right through to the destination in the importing country.

However, the Commission's 2020 report on exports by sea reveals many serious non-compliances with Regulation 1/2005.<sup>37</sup> The Commission's report shows that neither the exporters nor the Member State authorities are giving any proper consideration to the animals' welfare during the sea journeys. The report states "neither the Member States nor the Commission have information or statistics on the health and welfare state of the animals during sea journeys".

## 2

## Export of cattle and sheep from the EU to Türkiye

*Map 2 shows the key routes for animals being exported to Türkiye.*

In the 19 month period from October 2021 to April 2023 the EU exported 136,806 cattle and 13,092 sheep to Türkiye. *Table 4 below provides details of live exports of cattle from the EU to Türkiye; most of the sheep come from Bulgaria.*

Exports to Türkiye are mainly by road (though those from Ireland are by sea). Cattle and sheep are trucked from several countries to the border crossing between Bulgaria and Türkiye at Kapitan Andreevo-Kapikule.

A Commission report points out that animal welfare problems are a regular source of suffering during the export of cattle and sheep from the EU to Türkiye.<sup>38</sup>

Lengthy delays are common at the border. During these delays animals are sometimes kept on board the trucks often in overcrowded conditions with insufficient water, and very high temperatures in summer, which can cause extreme suffering.

In 2023 a consignment of cattle being sent from Romania to Türkiye was delayed for almost one month at the Turkish border as they did not have the required vaccinations. Throughout this time the animals – among them pregnant heifers - were not unloaded but forced to remain on the vehicle. Their health declined to such an extent that some died on the truck. When eventually the vehicle was allowed to cross Türkiye to Iraq, where missing vaccines are not required, it was reported that the animals were extremely weak and could hardly walk.

**TABLE 4: Export of live cattle from selected EU Member States to Türkiye. October 2021-April 2023**

Exporting Member State	Total number of cattle exported	Average journey length (days)	Average journey length (km)	Percentage of journeys starting from assembly centres
Bulgaria	71,999	15 hours	1,006	16%
Czechia	21,640	2 days & 21 hours	2,292	36%
Estonia	2,282	5 days & 11 hours	3,682	31%
Hungary	11,388	2 days & 12 hours	1,856	71%
Latvia	5,181	5 days	3,562	4%
Romania	15,638	1 day & 22 hours	1,467	67%
Slovakia	6,023	2 days & 20 hours	1,970	81%
Ireland (by sea) <sup>1</sup>	7,240	14 days & 4 hours	6,672	-



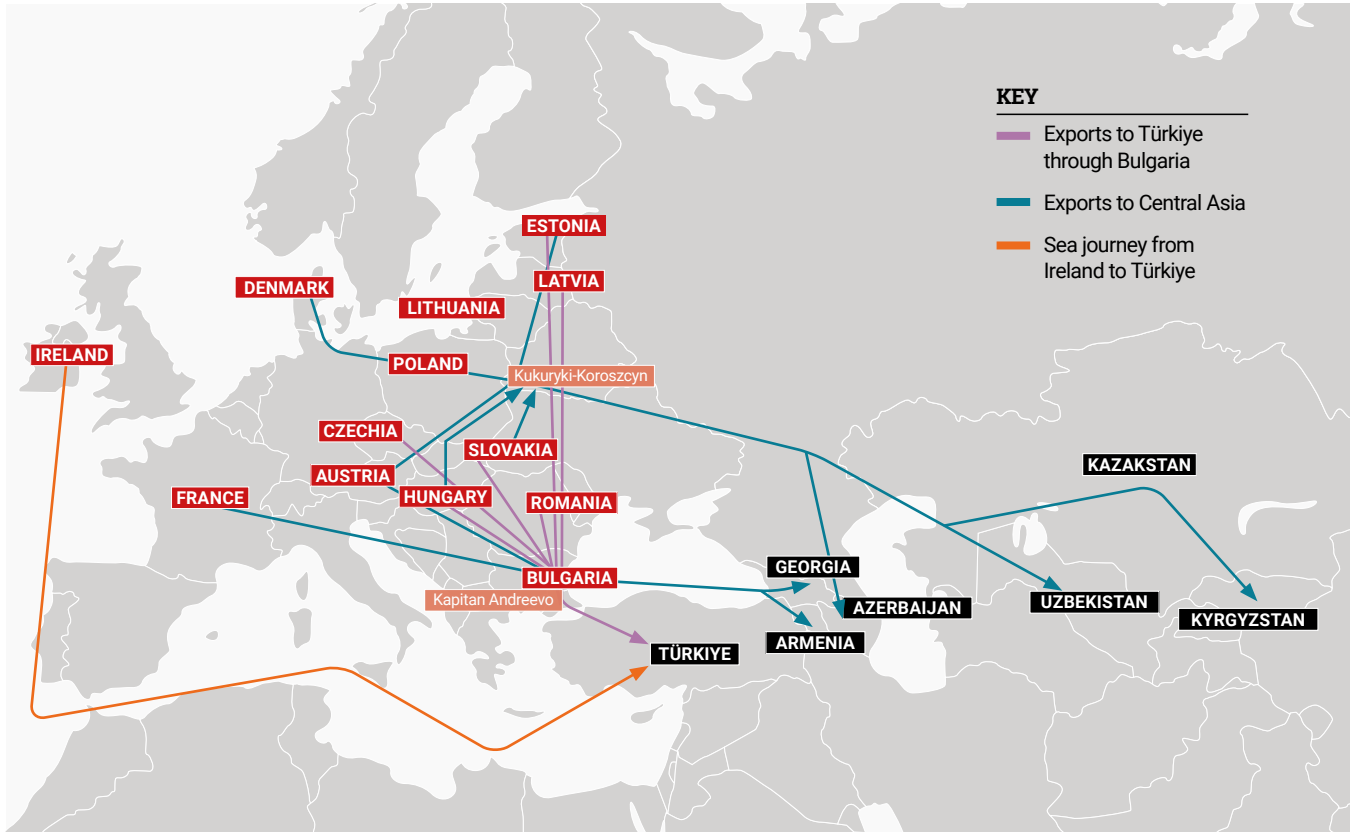
A note on the methodology for producing the figures in Tables 4-8

Data on the number of animals are taken from Eurostat as this is a publicly available source of information. Data on journey times (days and hours) and the percentage of journeys starting at assembly centres are derived from the TRACES data. The figures on road journey distances (kilometers) are calculated from Google Maps.

<sup>1</sup> The number of cattle exported from Ireland to Türkiye comes from the ships' Master's confidential report for the various voyages. The journey time is the actual time of a voyage provided by Marine Traffic, while the journey distance is from Ports.com



MAP 2. Key routes for cattle being exported to Türkiye and Central Asia.\*



### 3 Export of live cattle and sheep from the EU to Central and Western Asian countries

The EU exports cattle and sheep to Kazakhstan, Uzbekistan, Kyrgyzstan, Azerbaijan, Armenia and Georgia.

Exports to these countries are mainly by road. Animals are usually transported to the border crossing between Poland and Belarus at Kukuryki-Koroszczyn and from there on to western and central Asia. Temperatures in winter on these journeys can be bitterly cold. EU countries exporting to this region include Denmark, Austria, Estonia, Latvia, Lithuania, Poland, Czechia, Slovakia, Hungary, Bulgaria, France.

These journeys are massively long. Depending on the Member State of departure, journeys to Uzbekistan and Kazakhstan vary from 4,000-6,000 km and take one to three weeks.

EFSA's 2022 report on the transport of cattle states, regarding exports by road: "Animal exports from the EU are allowed to depart, even though there are no EU certified resting points outside of the EU and there are long waiting times for animals at the EU borders. Cattle being transported to distant third countries will need to cope with journeys that can take many days and potentially involve multiple unloading and reloading at premises." A similar assessment appears in EFSA's 2022 report on the transport of sheep.<sup>39</sup>

As indicated earlier, the *Zuchtvieh* case stemmed from the export of cattle to Uzbekistan. In that case the Court of Justice of the EU ruled that the provisions of Regulation 1/2005 continue to apply even when a consignment has left the EU; they apply all the way until the destination in the non-EU country is reached. However, the Court's ruling is largely ignored by exporters and most Member States.

Where, under the Court's ruling, the transport needs to stop at a facility in a non-EU country to enable animals to be given feed, water and 24 hours rest, the organiser must identify a place for the stop which either is an EU-approved control post or provides facilities equivalent to those of an EU-approved control post. Once animals leave the EU, there are few if any such places along the routes used to transport animals from the EU. Despite the near impossibility of complying with the Court's ruling, Member States' competent authorities regularly authorise exports that involve long road journeys without checking whether the animals will be given periodic food, water and rest as required by Regulation 1/2005. (A control post is a place where animals can be unloaded and receive 24 hours rest, food and water and, where necessary, veterinary treatment before the journey continues).



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### Transport of pregnant heifers

In 2022 the EU exported around 30,000 pregnant heifers, from several Member States. These animals are known as 'in-calf heifers'.

The reason for transporting in-calf heifers is mainly economic. Buying a pregnant heifer means you are buying a 'product' which is almost 'finished' meaning that you do not need to carry out insemination when the animal arrives at your farm (which is time consuming and requires experienced personnel to perform the insemination).

A pregnant heifer has two main economic benefits for the buyer: the heifer will produce milk within just a few months of arrival (after giving birth) meaning that the buyer does not need to wait long to enjoy the benefits of the sub-product (the milk). It also means that in just a few months the buyer will have a calf, which if female will become a future heifer that could herself be made pregnant (or become a bull for slaughter). So, the buyer of an in-calf heifer is getting in reality two animals + the milk. Moreover, in the long-term the buyer is increasing the quality and quantity of their dairy herd.



### EU exports seeding factory farming across the globe

The EU exports animals to extremely distant locations including Brazil, Colombia, Mexico, Nigeria and Taiwan. For example, France, Denmark and the Netherlands have exported pigs by air to Thailand, the Philippines, Singapore, Vietnam and Cambodia. The new evidence shows over 100 consignments with live pigs leaving Denmark. These journeys often involve a long trip to the airport, followed by a long-haul flight to Latin America (Brazil, Colombia, Mexico and Venezuela) or Asia (India, the Philippines, Singapore, Thailand and Vietnam). The evidence also revealed that eleven consignments of live pigs travelled to Cameroon, Ghana, and Uganda, mostly from France. These animals are likely to be breeding sows that have been bred to produce very large litters e.g. 14 piglets or more per litter. Indeed, Denmark's pig breeding sector produces sows capable of having 17-18 piglets per litter.<sup>40</sup>

Large litter size is a significant cause of multiple welfare problems for both sows and piglets, including higher piglet mortality as well as prolonged births. Very large litters have contributed to the use of farrowing crates to confine sows. Moreover, in large litters, the number of piglets born alive typically is more than the number of functional teats.<sup>41</sup> This has led to the use of nurse sows and artificial rearing systems to deal with surplus piglets, both of which entail serious welfare problems. By exporting breeding sows that have been genetically selected for very large litters, the EU is in effect exporting its inhumane factory farming model to other parts of the world.



### The EU is falling behind other countries that are banning live exports

Several countries are being much more progressive than the EU in recognising the suffering that is inherent in live exports. Accordingly, they have banned or are committed to banning the trade.

**Australia** – The Australian Government states that it “has committed to phasing out live sheep exports from Australia by sea.<sup>42</sup> The phase out will not take place during this current term of the Australian Parliament. This will provide time for individuals and businesses to prepare for a transition away from live sheep exports by sea.”

**New Zealand** – The New Zealand Government stated: “Exports of livestock by sea have ended, with the ban taking effect on 30 April 2023. The ban follows a transition period of two years to wind down the trade and give stakeholders time to adapt.”<sup>43</sup> However, the new Government plans to repeal the ban.

**GB** – In November 2023 the British Government announced that it will enact legislation to ban the export of animals for slaughter or fattening. (NB in May 2024, Great Britain introduced a ban on live exports for fattening and slaughter)



### Brazilian Court rules live exports are unlawful

Brazil is a major exporter of cattle to the Middle East. On 25 April 2023 the 25th Federal Civil Court of São Paulo ordered that no live animals should be exported from Brazil’s ports. The Judge based his ruling on three separate elements:

- **That welfare of the animals during the long sea journeys to the Middle East is very poor**
- **That slaughter practices in the Middle East would be illegal in Brazil**
- **That animals are sentient beings.**

**The Judge stated:**  
*“animals are not things. They are sentient living beings, that is, individuals who feel hunger, thirst, pain, cold, anguish, fear.”*



### Welfare of the animals during the long sea journeys to the Middle East is very poor

The veterinarian who inspected conditions on a livestock vessel moored in the port of Santos said: “the practice of maritime transport of animals over long distances is intrinsically and inherently related to the causation of cruelty, suffering, pain, indignity and corruption of animal welfare in various forms”.

On reading her report the Judge, Djalma Gomes, wrote that the conditions on the vessel “reveal a picture of total absence of animal welfare”

### Welfare at slaughter in the Middle East

Judge Gomes stressed that slaughter in the Middle East is inhumane and would be illegal if carried out in Brazil. He ruled that the difference in permitted slaughter methods “makes it impossible to export live animals to be slaughtered”.

This is in stark contrast to the EU’s position. The Commission and the Member States have regularly been informed of the immense suffering experienced at slaughter by animals exported to the Middle East and North Africa and that the slaughter methods are in breach of the international standards of the World Organisation for Animal Health. Despite this the Commission refuses to take this aspect into account.

Indeed, the Commission continues to adhere to its position of turning a blind eye to the suffering at slaughter of EU animals exported to the Middle East and North Africa. In its Answer to a Parliamentary Question in 2023 the Commission said that it is currently considering “the possibility to ban the export of large and small ruminants from the EU to non-EU countries. However, such measure is only being considered on grounds of animal welfare risks associated with the transport conditions and not the slaughter conditions”.<sup>44</sup>

### Status of animals as sentient beings under Brazilian Constitution

Judge Gomes pointed out that Article 225 of Brazil’s Constitution prohibits practices that “subject animals to cruelty”. He argued that this implicitly recognises animals as sentient as there would be no need to protect them from cruelty if they were non-sentient.

The Judge stated: “animals are not things. They are sentient living beings, that is, individuals who feel hunger, thirst, pain, cold, anguish, fear. A dog is not a chair, an ox is not a sack of potatoes”. The Judge’s recognition that animals are “sentient living beings” was an important factor in his ruling that live animals should not be exported from Brazil’s ports.

Again, this shows the EU’s contrasting position in a very poor light. Article 13 TFEU recognises animals as sentient beings and requires the Union and the Member States in formulating and implementing their policies in certain areas including agriculture and transport to “pay full regard to the welfare requirements of animals”. The Commission always ignores Article 13 even though we have often pointed out to them that exporting animals to cruel slaughter conditions is inconsistent with the Treaty obligation to pay full regard to the welfare requirements of animals.

Regrettably, the Brazilian Court ruling is not yet in force as it is subject to appeal.

# B: Transport of animals between EU Member States

Much of the EU is criss-crossed by long, inhumane journeys. Below we look at three facets of this trade: the transport of unweaned calves, over very long distances, the import by Italy of huge numbers of sheep for slaughter and the export by the Netherlands and Denmark of millions of pigs per year to southern and eastern Europe.

Note that the section on intra-EU trade does not aim to provide comprehensive figures of all transports of unweaned calves, pigs and sheep between Member States. Its aim is to highlight some of the especially lengthy journeys. So, the data in Tables 5-8 only relate to particularly long journeys between Member States.

## 4 Transport of unweaned calves

Map 3 shows some of the main strands of the trade in unweaned calves, while Table 5 sets out key data about this trade.

The driving force behind this trade is that some Member States, such as Ireland, have large dairy sectors that produce more calves than are needed as dairy herd replacements or for fattening by their beef or veal industries. Hence, such countries look for opportunities to export their surplus calves. In contrast to this, other Member States, such as the Netherlands, have large veal sectors for which their dairy sector does not produce sufficient calves. Accordingly, these countries need to import calves from elsewhere.

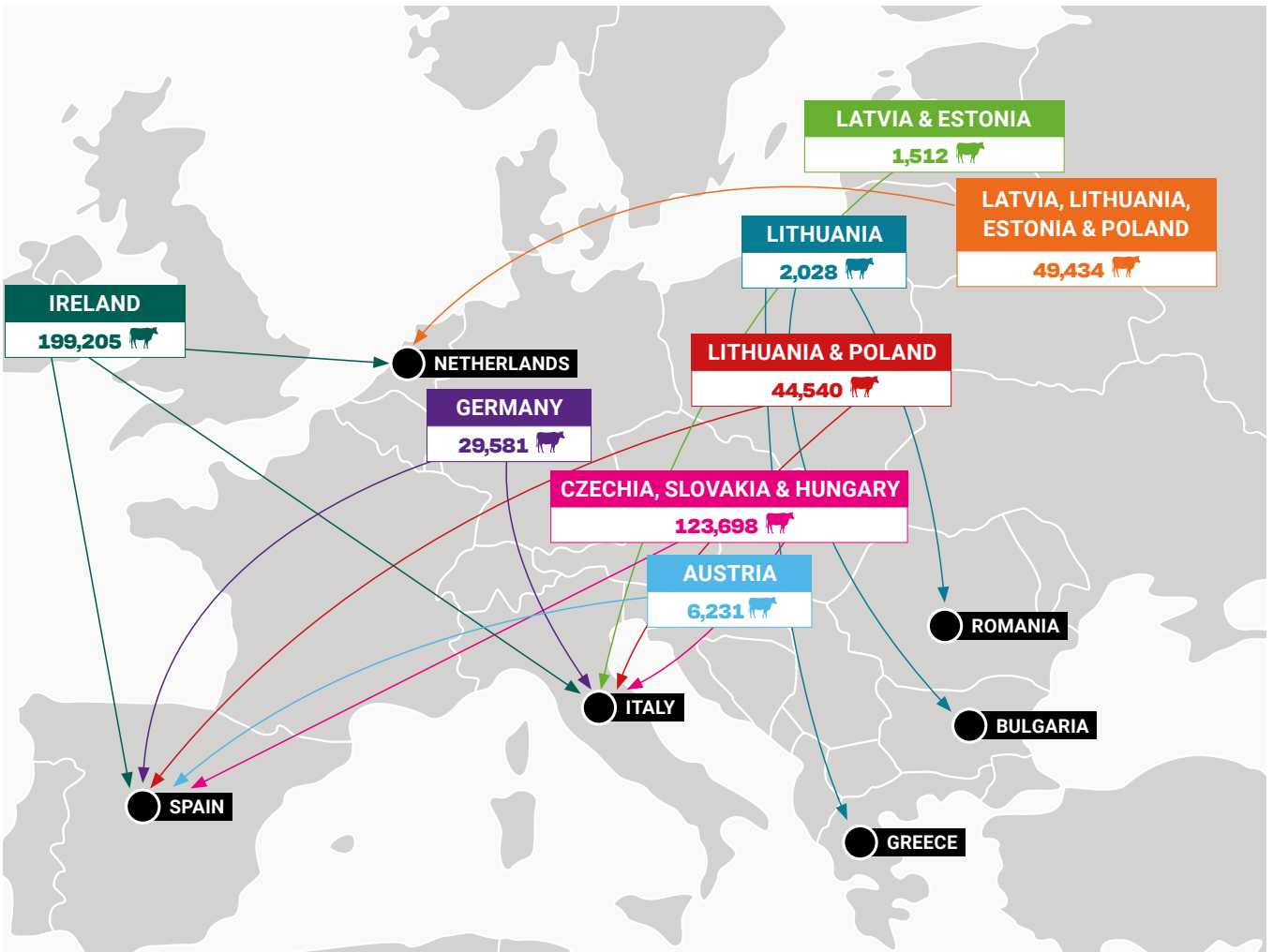
Hundreds of thousands of unweaned calves are transported between Member States each year.<sup>45</sup> Most unweaned calves transported on long journeys are males which because they are unable to produce milk, are generally unwanted in the dairy industry. Unweaned calves suffer greatly during long journeys.

**TABLE 5: Transport of unweaned calves on very long journeys between selected EU Member States. October 2021-April 2023**

Exporting Member State	Total number of unweaned calves exported	Average journey length (hours)	Average journey length (km)	Percentage of journeys starting from assembly centres
Lithuania & Poland to Italy & Spain	44,540	72 hours	2,404	99%
Latvia & Estonia to Italy	1,512	54 hours	2,148	74%
Czechia, Slovakia & Hungary to Italy & Spain	123,698	46 hours	1,851	86%
Ireland to Italy & Spain	28,112	60 hours	2,240	35%
Ireland to the Netherlands	171,093	51 hours	1,211	50%
Latvia, Lithuania, Estonia & Poland to the Netherlands	49,434	54 hours	1,967	47%
Lithuania to Romania, Bulgaria & Greece	2,028	56 hours	1,820	57%
Germany to Spain	23,388	21 hours	1,325	97%
Germany to Italy	6,193	N/A	N/A	N/A
Austria to Spain	6,231	46 hours	1,475	31%

Note: the data on the number of unweaned calves transported between Member States comes from Eurostat's category of cattle weighing 80kg or less; this is generally taken to comprise unweaned calves. The data on Dutch calf imports comes from RVO, a Dutch government agency.

MAP 3. Transport of unweaned calves within EU\*



The calves are kept on the farm where they were born until, often at just two to three weeks of age, they are collected and transported to an auction market or assembly centre, where they are grouped to constitute a full truck load. Often journey logs simply show the journey as starting at an assembly centre. This omits the stage of the journey from the farm to the assembly centre and so underestimates the overall journey length and travelling time.

Feed for unweaned calves is milk or milk replacer. Often calves are not fed milk replacer at assembly centres and are simply given electrolytes which do not fulfil the calves' nutritional needs e.g. energy, protein and certain vitamins.<sup>46</sup> Accordingly, journey logs that show the journey as starting at an assembly centre may be underestimating the length of time for which the calves have gone without feed.

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It is not practically possible to give milk replacer to calves while they are on a truck.<sup>47</sup> This leads to the following problems:

- **Unweaned calves have a daily need for energy and protein.** A journey on a transport vehicle causes calves to use up more energy than they would if kept in normal farm conditions. Unweaned calves in the first few weeks of life have almost no food reserves. EFSA's 2022 report on the transport of cattle states: "feed restriction during time spent at an auction market or assembly centre, together with the fasting period during a journey, infers that prolonged hunger is one of the highly relevant welfare consequences during the transport of unweaned calves".
- **Young calves are not able to control their body temperature well.**<sup>48</sup> The energy required to sustain a calf increases significantly when the calf is exposed to cold. Calves that receive no energy during a long journey will be more susceptible to heat and cold stress.
- **Young calves do not have a fully developed immune system.** If feeding is stopped or significantly reduced, this has a considerable impact on the immune system of calves who are already under severe stress due to being transported and who, because of their age, find themselves in an "immunological gap" – no longer protected by maternal antibodies as they were in the earlier colostrum (cow's milk received by a calf in the first six hours of life) phase and not yet having a fully developed immune system of their own.<sup>49</sup> Calves are often transported at two to five weeks of age which is a particularly vulnerable age as regards their underdeveloped immunity.



- **Transport is inherently stressful and stress is a key factor in undermining immunity.** This can lead to disease such as respiratory disorders. It is essential that the calves are supported during the journey by receiving adequate nutrition. To provide them with less nutrition than they would receive on-farm will compound the stress of the journey and further compromise their immune system.

Regulation 1/2005 allows unweaned calves to be transported on long journeys once they are above 14 days of age. In light of the welfare concerns regarding the transport of such calves, EFSA's 2022 report recommended that unweaned calves should not be transported until five weeks of age and at a minimum body weight of 50 kg and even then they should not be transported for more than eight hours.

**Unweaned calves suffer greatly during long journeys.**



**5**

### **Transport of pigs from the Netherlands and Denmark on very long journeys to southern and eastern Europe**

*Map 4 shows the long distance trade in pigs from the Netherlands and Denmark to southern and eastern Member States, while Tables 6 and 7 set out key data regarding these exports from the Netherlands and Denmark respectively.*

While some of the pigs are being sent for slaughter, most of the animals caught up in this trade are weaners i.e. young pigs that have been weaned from the sow.

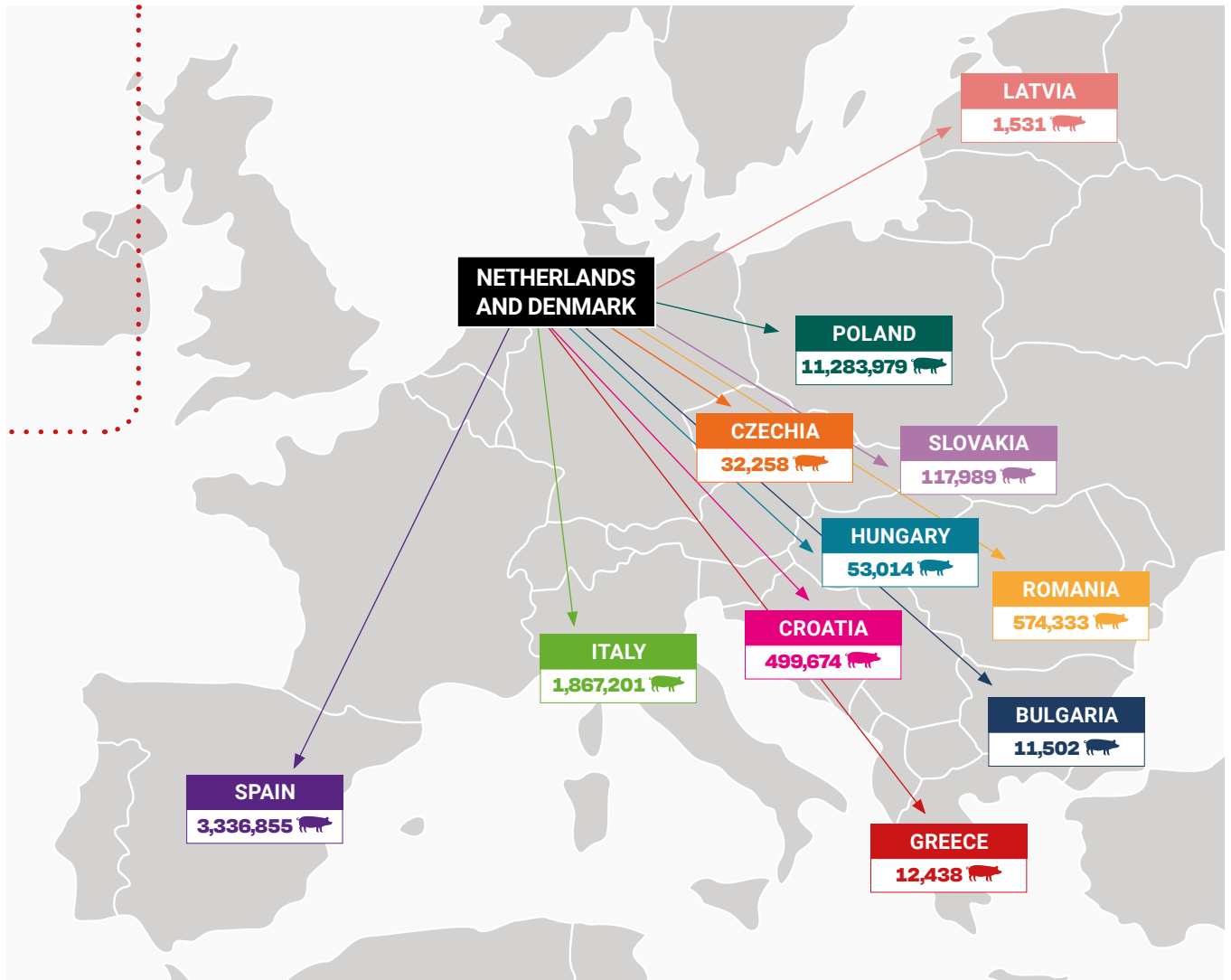
In addition to the trade in pigs within the EU, Eurostat data show that 629,428 pigs were exported by road from the EU to the countries of the former Yugoslavia in the period October 2021 to April 2023. Of these, 365,115 came from Croatia, and 228,140 from Denmark.

However, data from the Danish Veterinary and Food Administration show a much larger trade from Denmark. These state that in the period January 2022 - September 2023, Denmark exported 559,895 pigs to Serbia and 44,743 to Bosnia and Herzegovina.



#### MAP 4. Transport of pigs from Netherlands and Denmark to EU countries in southern and eastern Member States

The figures in Map 4 are for October 2021 – April 2023 for Netherlands and for January 2022 – September 2023 for Denmark.



**TABLE 6: Transport of pigs on very long journeys from Netherlands to selected EU Member States. October 2021-April 2023**

Note: The data on Dutch pig exports comes from RVO, a Dutch government agency.

Member State of destination	Total number of pigs exported	Average journey length (hours)	Average journey length (km)	Percentage of journeys starting from assembly centres
Spain	2,880,273	25	1,508	17%
Italy	147,669	22	1,198	35%
Greece	3,386	93	2,548	0%
Hungary	16,035	31	1,378	11%
Croatia	35,199	23	1,264	78%
Romania	229,665	32	1,738	9%
Poland	110,641	17	941	10%
Czechia	1,385	22	1,071	11%
Slovakia	9,218	17	1,182	8%
Bulgaria	6,320	65	2,225	0%



# An average of **34 million pigs** were transported between Member States per year in the period from **2017 to 2021**

**TABLE 7: Transport of pigs on very long journeys from Denmark to selected EU Member States. January 2022 - September 2023**

Member State of destination	Total number of pigs exported	Average journey length (hours)	Average journey length (km)	Percentage of journeys starting from assembly centres
Poland	11,173,338	18	1,039	12%
Italy	1,719,532	31	1,573	89%
Spain	456,582	58	2,179	78%
Greece	9,052	69	2,559	88%
Bulgaria	5,182	59	2,379	72%
Romania	344,668	60	2,129	28%
Croatia	464,475	24	1,605	95%
Hungary	36,979	21	1,479	64%
Czechia	30,873	17	1,031	22%
Slovakia	108,771	21	1,453	66%
Latvia	1,531	34	1,795	24%

The data on Danish pig exports is from the Danish Veterinary and Food Administration and provided by Dyrenes Beskyttelse.

The European Court of Auditors states that an average of ~ 34 million pigs were transported between Member States per year in the period from 2017 to 2021. This means that **pigs are the mammalian species that are transported in the highest numbers in the EU**. Road transport constituted 99% of total pig transport reported in this period. (The figure of ~ 34 million pigs includes relatively short cross border journeys such as from the Netherlands to Germany, as well as the very long journeys referred to in Tables 6&7).

A key factor behind the export of weaners from the Netherlands for fattening in other countries is the serious pollution that has been caused by the substantial amounts of faeces and urine produced by the Netherlands' excessive number of pigs. To combat this, the Netherlands has put in place environmental laws aimed at curbing the production of manure. This system in effect limits and reduces the number of livestock that a farmer may keep and hence the corresponding production of manure.

This system is encouraging some Dutch farmers to rear their pigs to only a relatively young age and then, before they grow big enough to produce substantial amounts of manure, to export them elsewhere for further fattening.

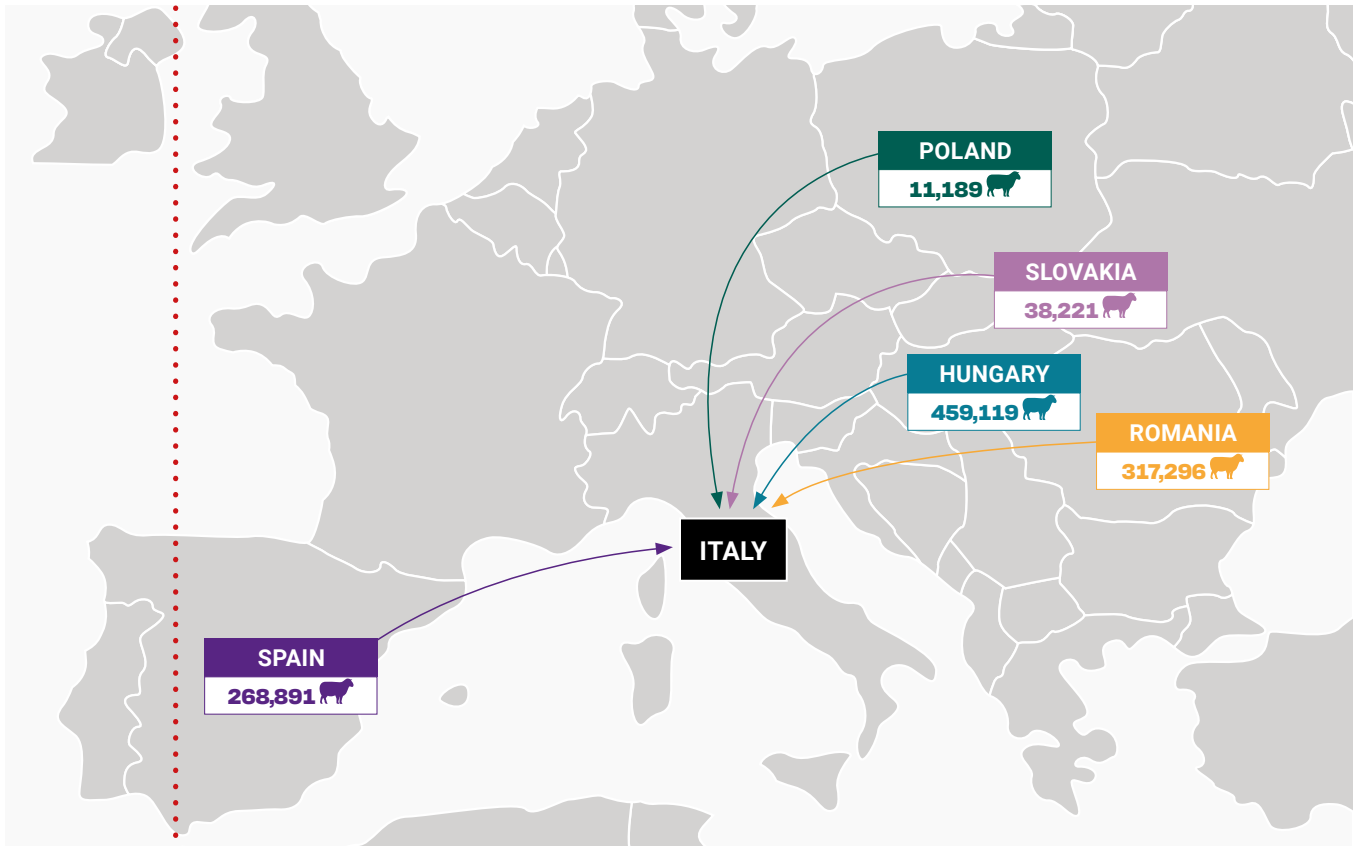
Some of the welfare problems affecting pigs during transport are described by EFSA's 2022 report on the welfare of pigs during transport as follows: "resting problems severity is expected to increase with increasing [journey] duration, as the lack of resting becomes more problematic for the animals and may lead to fatigue; even when a transport vehicle is fitted with water drinkers prolonged thirst may lead to dehydration and associated negative affective states, and physiological and behavioural changes that are likely to be associated with thirst have been identified after 8 h of transport; and due to practical difficulties in feeding animals on a transport vehicle, based on behavioural and physiological indicators, prolonged hunger is likely present after 12 h of feed deprivation. Depending on the pre-transport fasting this may correspond with the early hours of a journey."<sup>50</sup>

**In light of the problems of prolonged thirst and prolonged hunger that can arise after just 8 and 12 hours of transport respectively, the long journeys from the Netherlands and Denmark to southern and eastern Europe should be brought to an end, and indeed any journeys over eight hours.**

Indeed the 2022 EFSA report states: "On the basis of evidence on continuous welfare consequences involving stress and negative affective states, for the benefit of animal welfare, the journey duration and frequency, should be kept to a minimum".



MAP 5. The trade in sheep being transported on very long journeys from other Member States to Italy\*



## 6 Import by Italy of sheep for slaughter

Map 5 shows the trade in sheep being transported on very long journeys from other Member States to Italy, while Table 8 sets out key data regarding this trade.

According to the European Commission's TRACES system, around 3 million sheep were transported annually between Member States between 2019 and 2021, with approximately 95% of these transports taking place by road.<sup>51</sup>

In total, each year Italy imports around one million sheep and lambs for slaughter either immediately on arrival or after a period of fattening. The animals are mainly coming from Romania, Hungary and Spain. This trade is due to Italy's consumption of sheepmeat being much greater than its production of sheep.



TABLE 8: Transport of sheep on very long journeys to Italy for slaughter

Member State of departure	Total number of sheep exported	Average journey length (hours)	Average journey length (km)	Percentage of journeys starting from assembly centres
Romania to Italy	317,296	29	1,534	93%
Hungary to Italy	459,119	22	1,312	78%
Slovakia to Italy	38,221	18	1,198	80%
Poland to Italy	11,189	25	1,443	44%
Spain to Italy	268,891	22	1,398	1%



**Conditions on the trucks can be **appalling**. In some cases over **700 lambs** are packed into a truck across four tiers.**



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### Transport of unweaned lambs

In Italy, lamb is a main part of many festive meals at Easter and Christmas. Some 300,000 unweaned lambs are imported each year by Italy to be slaughtered for these festivities.<sup>52</sup> The lambs are mainly imported from Romania and Hungary and many go to slaughterhouses in southern Italy.<sup>53</sup>

These journeys may last from 24-30 hours. Conditions on the trucks can be appalling. In some cases over 700 lambs are packed into a truck across four tiers. Not only do the lambs have insufficient floor space, but there is often so little height in the compartments that the lambs' heads touch the ceiling resulting in discomfort and ventilation being impeded.<sup>54</sup>

Unweaned lambs need to be fed on milk or, if they are being transported, on milk replacer. However, it is not possible to give milk replacer to lambs while they are on a truck. Accordingly, these tiny lambs are compelled to endure long journeys without any feed.

EFSA's 2022 report on the transport of small ruminants states that "the procedures of unweaning and prolonged transport immediately after unweaning are stressful and exhaust the body reserves of unweaned lambs".<sup>55</sup>

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### Welfare concerns for live fish transport

Almost all farmed fish will be transported at least once in their lives, and this can occur when they are larvae, juveniles or adults. EFSA states that the process of transportation can cause the deterioration of fish welfare and health.<sup>56</sup>

Fish are routinely starved for management and water-quality reasons before transport, but inappropriate starvation periods can cause poor welfare, deplete immune system function and cause aggression.<sup>57</sup> Overcrowding during transport can be another cause of poor welfare for aquatic species, since they are packed into containers at greater stocking densities than normal farming conditions.<sup>58</sup>

Water quality can deteriorate and quickly become extremely poor and incompatible with living or good welfare.<sup>59</sup> Aquatic species are sensitive to subtle changes in water quality parameters such as temperature, salinity and pH, which unless properly monitored and maintained will deteriorate during long journey times<sup>60</sup>.

Loading and unloading during transport is typically the most stressful step of the process. Physical injuries to scales and fins can occur while handling and harvesting.<sup>61</sup>

Fish will continue to be affected by live transport for several days after the process and continuing to monitor their behaviour and health in the following days is vital for their welfare.<sup>62</sup>



## European citizens want to see substantial reforms in animal transport

In the European Commission's recent public consultation to support the fitness check of EU animal welfare legislation...

**95%** of respondents were in favour of introducing maximum journey times...

**94%** were in favour of a prohibition on the transport of unweaned calves and other vulnerable animals, such as pregnant cows, and...

**94%** considered that the export of live animals to non-EU countries for slaughter should be prohibited.

The 2023 Special Eurobarometer *Attitudes of Europeans towards animal welfare* states:

**“More than eight in ten Europeans consider that the travel time for the commercial transport of live animals within or from the EU should be limited.”**

## Revising Council Regulation 1/2005 on the protection of animals during transport

We urge the Commission to propose, and the Member States and the Parliament to adopt the following reforms to Council Regulation 1/2005:

### A ban on the export of live farm animals to non-EU countries

except to countries that are geographically close to the EU and that have legislation on the protection of animals during transport and slaughter that is at least as strong as that of the EU.

### A prohibition on the transport of unweaned animals

Unweaned animals should not be transported. They suffer greatly during transport.

In its Recommendations adopted in January 2022, the European Parliament recognised the problems that are inherent in the transport of unweaned animals and recommended that the transport of such animals should be avoided and not allowed for calves below four weeks of age, except for journeys of under 50 km carried out by farmers (Recommendation 104). While this is helpful, it is not strong enough. We believe that the transport of unweaned animals should be prohibited altogether. The Commission has said that “calves could be considered as unweaned under the age of two months and lambs under the age of six weeks”.<sup>63</sup>

### Maximum journey time of eight hours to slaughter or for fattening

In its Recommendations the European Parliament recommended that journey times for animals going to slaughter should not exceed eight hours, while taking into consideration the specific geographical characteristics of some regions, such as islands and outermost regions (Recommendation 87). We believe the eight-hour limit should apply to journeys for both slaughter and fattening. This is in line with the position of the Federation of Veterinarians of Europe which states: “Animals should be reared as close as possible to the premises on which they are born and slaughtered as close as possible to the point of production.”

### For poultry, rabbits and end of production animals, the maximum journey time should be four hours

The vulnerability of these animals to suffering during transport is recognised by the Parliament which recommended that the transport of poultry, rabbits and end-of-career animals should only be permitted to the closest available species-appropriate slaughterhouse and the network of mobile and local slaughterhouses should be enhanced so that a maximum limit of four hours' transport of end-of-career animals can be attained in the future (Recommendations 111 & 114).





## Pregnant animals

The Parliament recognised the problems involved in transporting pregnant animals and recommended that the transport of pregnant animals in the last third of gestation should be restricted to a maximum of four hours (Recommendation 110). We believe that a stronger approach is needed and that animals for whom 40% or more of the expected gestation period has already passed must not be transported.



## Temperature limits

The Parliament recognised the suffering involved in transporting animals in extreme temperatures and recommended that journey logs should only be approved when temperatures are forecast to be within the range of 5 °C and 30 °C for the duration of the whole journey, regardless of the type of transport used (Recommendation 94). Given that temperatures inside the vehicles generally exceed external temperatures, we believe that the temperature limits should be stricter. Animal transports should not be approved when external temperatures are forecast to be below 5 °C or above 25 °C on any section of the route.



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## Recommendations for improving standards of live fish transport

### PRE-TRANSPORT:

- Create a licensing regime for vehicles carrying live fish to ensure they meet fish welfare, health, and safety standards, including monitoring water quality.
- Operators should have control systems for personnel competence, cleaning, and maintenance, and must be trained on species' physiology, stress, and disease.
- Vehicles should have equipment for monitoring oxygen, CO<sub>2</sub>, temperature, and salinity and the equipment to carry and supply supplemental oxygen.
- Ensure smooth surfaces, no harmful emissions, and no sharp angles in containment units and equipment.
- Use dampening devices for vehicle vibrations and equip wellboats and towing vessels with satellite tracking systems.

### JOURNEY PREPARATIONS:

- Minimise the duration of starvation before loading and establish species-specific maximum starvation periods.
- Sedatives may be used to calm fish for journeys under the instruction and guidance of a veterinarian.
- Maintain suitable temperature conditions for different fish species.
- Inspect fish for fitness to transport and avoid loading if they show signs of disease or stress.
- Plan for staff, oxygen, and risk factors during the journey.
- Inspections should not be carried out mid-journey unless equipment has detected a problem.
- Contingency plans should be in place for all journeys to prepare for unforeseen issues.

### LOADING:

- Minimise loading time and use best handling practices.
- Gradually crowd fish to avoid stress.
- Prefer fish pumps over nets for moving and loading. Nets should be knotless and monitored for injuries.

### TRANSPORTATION:

- Ensure fish are calm before starting the journey.
- Gentle driving is necessary to minimise stress, and no feed should be offered, except during exceptionally long journeys.
- Maintain water quality and supply supplemental oxygen when needed.

### UNLOADING:

- Minimise unloading time and use best handling practices.
- Acclimate fish to receiving water and monitor for injuries.

### POST-TRANSPORT:

- Monitor fish for one week after unloading for appetite, abnormal behaviours, disease, and mortality.
- Health checks should be conducted if increased mortality occurs.
- Reporting journey records for continuous improvement of welfare standards, vehicle licensing, and operator competences is recommended.<sup>64</sup>





## CONCLUSION

**The recently published data provide fresh insights into the debased state of the EU trade in live animals – both within the EU and in particular as regards the export to non-EU countries. The previously unpublished records reveal that many exports to non-EU countries simply do not appear in official TRACES records.**

The newly published data shows that many journeys are very much longer – and so very much more stressful – than indicated on official records. This is in part due to assembly centres frequently being given as the place of departure in journey plans, while in reality the journey often started from farms that in some cases were distant from the assembly centre.

The lack of comprehensive, accurate records makes it difficult to regulate the trade and obscures the full extent of the animal suffering generated by the trade.

The EU should ban live exports to non-EU countries. In the meantime, as long as this trade continues the EU must ensure that complete and accurate records regarding the number of animals exported and the true length of journeys are maintained.

The EU's current policy on animal transport ignores the following factors which should henceforth shape EU policy:

- The position of the Federation of Veterinarians of Europe which is that *"Animals should be reared as close as possible to the premises on which they are born and slaughtered as close as possible to the point of production"*.
- Article 13 of the Treaty on the Functioning of the European Union which requires the EU, in formulating its policies on transport and agriculture *"to pay full regard to the welfare requirements of animals"*.
- The European Food Safety Authority's 2022 reports that state that for the benefit of animal welfare, the journey duration and frequency should be kept to a minimum.
- The recommendation of the World Organisation for Animal Health that the amount of time animals spend on journeys by land and sea should be kept to a minimum.


# ENDNOTES

- 1 EFSA, 2022. Scientific Opinion on the welfare of pigs on farm. *EFSA Journal* 2022;20(8):7421, 315 pp. <https://doi.org/10.2903/j.efsa.2022.7421>
- 2 EFSA, 2022. Scientific Opinion on the welfare of pigs on farm. *EFSA Journal* 2022;20(8):7421, 315 pp. <https://doi.org/10.2903/j.efsa.2022.7421>
- 3 The records relate to both planned and confirmed journeys, although there is nothing to indicate the journeys didn't happen, and cross referencing figures with other data records for some relevant periods appears to show comparable transports occurred.
- 4 <https://www.aljazeera.com/news/2019/11/25/more-than-14000-sheep-drown-after-ship-capsizes-off-romania> Accessed 3 November 2023
- 5 [https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-12/2020\\_01\\_27\\_efa\\_transport\\_white\\_paper\\_0.pdf](https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-12/2020_01_27_efa_transport_white_paper_0.pdf)
- 6 [https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-12/2020\\_01\\_27\\_efa\\_transport\\_white\\_paper\\_0.pdf](https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-12/2020_01_27_efa_transport_white_paper_0.pdf)
- 7 [https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-12/2020\\_01\\_27\\_efa\\_transport\\_white\\_paper\\_0.pdf](https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-12/2020_01_27_efa_transport_white_paper_0.pdf)
- 8 [https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/690708/EPRS\\_BRI\(2021\)690708\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/690708/EPRS_BRI(2021)690708_EN.pdf)
- 9 Opinion on the welfare of pigs during transport. *EFSA Journal* 2022;20(9):7445, 108 pp. <https://doi.org/10.2903/j.efsa.2022.7445>
- 10 EFSA, 2022. Welfare of small ruminants during transport. <https://doi.org/10.2903/j.efsa.2022.7404>
- 11 EFSA, 2022. Welfare of cattle during transport. <https://efsa.onlinelibrary.wiley.com/doi/full/10.2903/j.efsa.2022.7442>
- 12 EFSA, 2022. Scientific Opinion on the welfare of cattle during transport. *EFSA Journal* 2022;20(9):7442, 121 pp. <https://doi.org/10.2903/j.efsa.2022.7442>
- 13 EFSA, 2022. Scientific Opinion on the welfare of small ruminants during transport. *EFSA Journal* 2022;20(9):7404, 101 pp. <https://doi.org/10.2903/j.efsa.2022.7404>
- 14 EFSA, 2022. Opinion on the welfare of pigs during transport. *EFSA Journal* 2022;20(9):7445, 108 pp. <https://doi.org/10.2903/j.efsa.2022.7445>
- 15 EFSA, 2022. Scientific Opinion on the welfare of cattle during transport. Op.Cit.
- 16 EFSA, 2022. Scientific Opinion on the welfare of small ruminants during transport. Op.Cit.
- 17 EFSA, 2022. Opinion on the welfare of pigs during transport. Op.Cit.
- 18 EFSA, 2022. Scientific Opinion on the welfare of cattle during transport. Op.Cit.
- 19 EFSA, 2022. Scientific Opinion on the welfare of small ruminants during transport. *EFSA Journal* 2022;20(9):7404, 101 pp. <https://doi.org/10.2903/j.efsa.2022.7404>
- 20 EFSA, 2022. Opinion on the welfare of pigs during transport. Op.Cit.
- 21 EFSA, 2022. Scientific Opinion on the welfare of cattle during transport. Op.Cit.
- 22 EFSA, 2022. Scientific Opinion on the welfare of small ruminants during transport. Op.Cit.
- 23 EFSA, 2022. Opinion on the welfare of pigs during transport. Op.Cit.
- 24 European Commission, 2022. Staff Working Document: Executive Summary of the Fitness Check. SWD(2022) 329 final
- 25 [https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-12/2020\\_01\\_27\\_efa\\_transport\\_white\\_paper\\_0.pdf](https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-12/2020_01_27_efa_transport_white_paper_0.pdf)
- 26 Animal Welfare Foundation, 2021. 78 EU-approved livestock carriers. [https://www.animal-welfare-foundation.org/files/downloads/78\\_EU\\_livestock\\_carriers\\_June\\_2021\\_RobindesBois\\_AWF\\_TSB-1.pdf](https://www.animal-welfare-foundation.org/files/downloads/78_EU_livestock_carriers_June_2021_RobindesBois_AWF_TSB-1.pdf)
- 27 EFSA, 2022. Scientific Opinion on the welfare of small ruminants during transport. Op.Cit.
- 28 EFSA, 2022. Scientific Opinion on the welfare of cattle during transport. Op.Cit.
- 29 EFSA, 2022. Scientific Opinion on the welfare of small ruminants during transport. Op.Cit.
- 30 EFSA, 2022. Scientific Opinion on the welfare of cattle during transport. Op.Cit.
- 31 EFSA, 2022. Scientific Opinion on the welfare of small ruminants during transport. Op.Cit.
- 32 EFSA, 2022. Scientific Opinion on the welfare of small ruminants during transport. Op.Cit.
- 33 European Commission, 2020. Overview report on the welfare of animals transported by sea. DG(SANTE) 2019-6835
- 34 Final report of an audit carried out in Slovenia from 16 April 2018 to 20 April 2018 in order to evaluate animal welfare during transport to non-EU countries; DG(SANTE) 2018-6449
- 35 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; DG(SANTE) 2018-6446
- 36 Animal welfare overboard, 2017. Animal Welfare Foundation
- 37 European Commission, 2020. Overview report on the welfare of animals transported by sea. DG(SANTE) 2019-6835
- 38 European Commission, 2019. Overview report on welfare of animals exported by road. DG(SANTE) 2019-6834


- 39 EFSA, 2022. Scientific Opinion on the welfare of small ruminants during transport. Op.Cit.
- 40 EFSA, 2022. Scientific Opinion on the welfare of pigs on farm. *EFSA Journal* 2022;20(8):7421, 315 pp. <https://doi.org/10.2903/j.efsa.2022.7421>
- 41 EFSA, 2022. Scientific Opinion on the welfare of pigs on farm. *EFSA Journal* 2022;20(8):7421, 315 pp. <https://doi.org/10.2903/j.efsa.2022.7421>
- 42 Australian Government: Department of Agriculture, Fisheries and Forestry. <https://www.agriculture.gov.au/biosecurity-trade/export/controlled-goods/live-animals/livestock/live-sheep-exports-phase-out> Accessed 20 October 2023
- 43 New Zealand Government: Ministry Primary Industries. <https://www.mpi.govt.nz/export/animals/live-animals-including-livestock/#:~:text=Exports%20of%20livestock%20by%20sea%20have%20ended%2C%20with%20the%20ban,give%20stakeholders%20time%20to%20adapt>. Accessed 20 October 2023
- 44 European Commission Answer E-003979/2022
- 45 EFSA, 2022. Scientific Opinion on the welfare of cattle during transport. Op.Cit.
- 46 EFSA, 2022. Scientific Opinion on the welfare of cattle during transport. Op.Cit.
- 47 EFSA, 2022. Scientific Opinion on the welfare of cattle during transport. Op.Cit.
- 48 Weeks C, 2007. UK calf transport and veal rearing. <https://www.ciwf.org.uk/media/3818647/uk-calf-transport-and-veal-rearing.pdf>
- 49 EFSA, 2022. Scientific Opinion on the welfare of cattle during transport. Op.Cit.
- 50 Opinion on the welfare of pigs during transport. *EFSA Journal* 2022;20(9):7445, 108 pp. <https://doi.org/10.2903/j.efsa.2022.7445>
- 51 EFSA, 2022. Scientific Opinion on the welfare of small ruminants during transport. Op.Cit.
- 52 <https://www.animal-welfare-foundation.org/service/dossiers/long-distance-transport-of-lambs> Accessed 22 September 2023
- 53 <https://www.essereanimali.org/en/2022/04/investigation-transport-lambs-easter/> Accessed 22 September 2023
- 54 Ibid
- 55 EFSA, 2022. Scientific Opinion on the welfare of small ruminants during transport. Op.Cit.
- 56 European Food Safety Authority. 2004. Opinion of the Scientific Panel on Animal Health and Welfare (AHAW) on a request from the Commission related to the welfare of animals during transport. *EFSA J.* 2(5):44. doi:10.2903/j.efsa.2004.44.
- 57 [https://www.europarl.europa.eu/RegData/etudes/STUD/2021/690875/IPOL\\_STU\(2021\)690875\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2021/690875/IPOL_STU(2021)690875_EN.pdf)
- 58 [https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-12/2020\\_01\\_27\\_efa\\_transport\\_white\\_paper\\_0.pdf](https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-12/2020_01_27_efa_transport_white_paper_0.pdf)
- 59 [https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-12/2020\\_01\\_27\\_efa\\_transport\\_white\\_paper\\_0.pdf](https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-12/2020_01_27_efa_transport_white_paper_0.pdf)
- 60 [https://www.europarl.europa.eu/RegData/etudes/STUD/2021/690875/IPOL\\_STU\(2021\)690875\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2021/690875/IPOL_STU(2021)690875_EN.pdf)
- 61 [https://www.europarl.europa.eu/RegData/etudes/STUD/2021/690875/IPOL\\_STU\(2021\)690875\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2021/690875/IPOL_STU(2021)690875_EN.pdf)
- 62 [https://www.europarl.europa.eu/RegData/etudes/STUD/2021/690875/IPOL\\_STU\(2021\)690875\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2021/690875/IPOL_STU(2021)690875_EN.pdf)
- 63 Letter from the Commission to the Member States dated 2 December 2009. SANCO D5 DS/dj D(2009) 450351
- 64 [https://www.europarl.europa.eu/RegData/etudes/STUD/2021/690875/IPOL\\_STU\(2021\)690875\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2021/690875/IPOL_STU(2021)690875_EN.pdf)


\*Unless otherwise specified, all data depicted in the visualised maps cover the period October 2021 - April 2023.

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