

# The transport of animals from the EU to third countries

A Dossier by Animals' Angels  
and Animal Welfare Foundation (AWF)

March 2025



**AWF** ANIMAL  
WELFARE  
FOUNDATION

Im Einsatz für Tiere



ANIMALS' ANGELS

we are there with the animals

## Dedication



“Unforgotten - Kapikule, September/October 2024”

In memory of ‘Hope’, ‘Mercy’ and the other 67 German heifers and their calves who were stranded at the Turkish border for weeks, left to their fate and dying in agony under the eyes of EU and Turkish authorities.

It must never happen again.

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*Cover picture:*

*Transport of Portuguese bulls, stuck at the port of Tanger-Med for 20 days, Morocco, January 2024*

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## SUMMARY

### Why EU animals shall not be exported to non-EU countries?

- Exports of animals to third countries involve long journeys by road and sea, causing significant stress and suffering to the animals.
- There is a lack of control in the non-EU leg of the journey.
- There are no contingency plans and no animal welfare procedures in the event of import refusal of the animals.
- In case of rejections at non-EU borders, the return of the animals into the EU is not permitted due to conflicting EU animal health laws.
- The ECJ ruling C-424/13 cannot be complied with until the final destination.
- Regulation EC 1/2005 cannot be enforced until final destination.
- Animals are exported to so-called “animal welfare high-risk countries” which lack minimal animal welfare standards.
- The importing non-EU countries either lack national animal welfare legislation or if they have their own legislation, they fail to implement it. Also, the international WOH standards for animal welfare are not applied.

The EU recognizes animals as sentient beings and has to pay full regard to their welfare in the Union’s policies according to Art. 13 TFEU.

→ The only responsible solution is to stop the export of live animals to third countries without animal welfare guarantees.

→ Long transports of animals must be avoided, and the export of animal products should be prioritized over live animals.

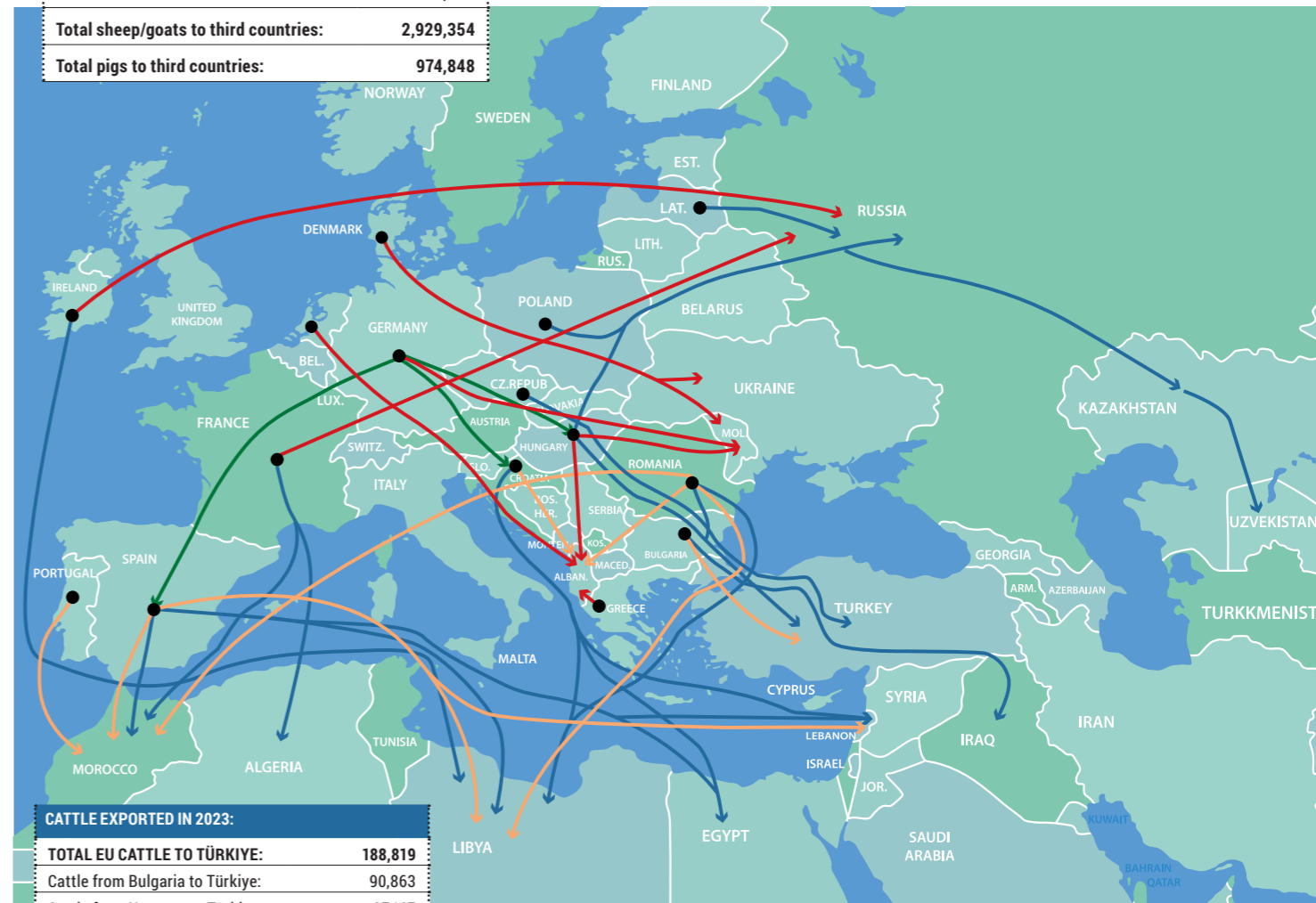
### Example Germany:

In 2019, several federal states in Germany banned the export of so-called breeding cattle to various “animal welfare high-risk countries” (those lacking minimal welfare standards) due to non-compliance with Regulation EC 1/2005 during the journey leg outside the European Union.<sup>1</sup>

However, exports of breeding cattle from these German regions continue. The industry has found a way around this. E.g., Hungary plays a significant role in this legal loophole. The animals are transported from Germany to Hungary and exported from Hungary to non-EU countries such as Türkiye, Lebanon, Libya, Russia, Uzbekistan and Kazakhstan.

<sup>1</sup> <https://www.agrarheute.com/tier/rind/hessen-stoppt-tiertransporte-drittlaender-552384> / [https://www.stmuv.bayern.de/themen/tiergesundheit\\_tierschutz/tierschutz/tiertransporte\\_drittstaaten/index.htm](https://www.stmuv.bayern.de/themen/tiergesundheit_tierschutz/tierschutz/tiertransporte_drittstaaten/index.htm) / [https://www.schleswig-holstein.de/DE/landesregierung/ministerien-behoerden/VI/Presse/PI/2019/0219/190225\\_Tiertransporte?nn=2309ee6f-8d32-4a05-8272-354fb9fd297d](https://www.schleswig-holstein.de/DE/landesregierung/ministerien-behoerden/VI/Presse/PI/2019/0219/190225_Tiertransporte?nn=2309ee6f-8d32-4a05-8272-354fb9fd297d) / <https://www.spiegel.de/politik/deutschland/tiertransporte-in-nicht-eu-staaten-immer-mehr-bundeslaender-sind-dagegen-a-1257711.html>

<b>TOTAL EU LIVE EXPORTS IN 2023:</b>	<b>~ 4.9 MILLION</b>
<b>Total cattle to third countries:</b>	<b>973,904</b>
<b>Total sheep/goats to third countries:</b>	<b>2,929,354</b>
<b>Total pigs to third countries:</b>	<b>974,848</b>



<b>CATTLE EXPORTED IN 2023:</b>	
<b>TOTAL EU CATTLE TO TÜRKIYE:</b>	<b>188,819</b>
Cattle from Bulgaria to Türkiye:	90,863
Cattle from Hungary to Türkiye:	27,167
Cattle from Czechia to Türkiye:	20,389
Cattle from Romania to Türkiye:	14,389
Cattle from Germany to Türkiye:	1,656
<b>TOTAL EU CATTLE TO EGYPT</b>	<b>19,250</b>
Cattle from Spain to Egypt	13,190
Cattle from Croatia to Egypt	4,712
Cattle from Romania to Egypt	1,348
<b>CATTLE TO LEBANON</b>	<b>71,521</b>
Cattle from Croatia to Lebanon	29,797
Cattle from Spain to Lebanon	21,313
Cattle from Slovenia to Lebanon	15,555
<b>CATTLE ON EASTERN ROUTE</b>	<b>&gt; 35,200</b>
Cattle to Russia	16,341
Cattle to Kazakhstan	9,204
Cattle to Uzbekistan	8,156
Cattle to Ukraine	1,587

<b>SHEEP AND GOATS EXPORTED IN 2023:</b>	
<b>TOTAL EU SHEEP TO MOROCCO</b>	<b>396,768</b>
Sheep from Spain to Morocco	349,428
Sheep from Romania to Morocco	31,870
Sheep from Portugal to Morocco	15,470
<b>TOTAL EU SHEEP AND GOATS TO LIBYA</b>	<b>238,526</b>
Sheep and goats from Spain to Libya	171,925
Sheep from Romania to Libya	62,670
Sheep from Croatia to Libya	3,498

<b>PIGS EXPORTED IN 2023:</b>	
<b>PIGS TO ALBANIA</b>	<b>120,733</b>
Pigs from Greece to Albania	68,999
Pigs from Hungary to Albania	38,737
Pigs from The Netherlands to Albania	5,850
<b>PIGS TO MOLDOVA</b>	<b>62,278</b>
Pigs from Hungary to Moldova	40,583
Pigs from Germany to Moldova	20,278
Pigs from Denmark to Moldova	1,135

**Figure 1:** Examples of export routes of EU animals to non-EU countries, data extracted from Eurostat for the year 2023 (in blue: cattle, in green: cattle exported from Germany via other EU member states, in orange: sheep and goats, in red: pigs). Please note: for better overview, not all export routes and non-EU destination countries are included.

## I. INTRODUCTION

Exports of EU animals to non-EU countries continue regularly, with nearly 1 million cattle, 3 million sheep and goats, and 1 million pigs being exported in 2023, according to Eurostat data.<sup>2</sup>

The manifold problems related to animal welfare during export transports and in third countries that lack animal welfare assurances are well-known and have been documented by journalists and NGOs working in the field of animal protection during transport for more than 25 years.<sup>3</sup>

The topic of live export is discussed on high level in the EU. For years, **EU citizens have been calling for better regulations** that effectively protect animals during transport, including a ban on the export of live animals to third countries, especially for animals intended for slaughter.<sup>4</sup>

EU Member States call for an EU-wide solution. In a joint position paper for a revision of the EU's legislation on animal transport from June 2022, the **Netherlands, Denmark, Belgium, Germany and Sweden take a stand demanding to restrict the live export of farmed animals** outside the EU "where the third country's legislation is not equivalent to the EU's standards on animal welfare"<sup>5</sup>.

On 14 February 2025, the German Agriculture Ministry publishes a key issue paper on a national regulatory project aimed at safeguarding the welfare of animals exported from Germany to third countries.<sup>6</sup> The document states that while the animal welfare standards of the World Organisation for Animal Health (WOAH) have global recognition, many cases have shown that these standards are not implemented in practice. **Germany calls for an EU-wide uniform solution, but in the meantime plans national regulatory measures.** This includes that the export of animals will be linked to bilateral (or multilateral) agreements between the third countries (destination and transit countries) and Germany. The third countries must commit to adhering to specific animal welfare standards and implementing them in their national legislation.

The Committee of Inquiry on the Protection of Animals during Transport (ANIT Committee)<sup>7</sup> concludes in its report A9-0350/2021 "(...) that once livestock consignments cross the EU border, respect for animal welfare standards cannot always be guaranteed both en route and on arrival, due to the lack of control and authority of the EU in third countries that are not bound by EU legislation". Furthermore, the ANIT Committee "recalls the judgment of the Court of Justice of the European Union, which states that EU welfare rules are binding until the final place of destination in third countries (...)" and "that Member States may suspend exports where they see that animal welfare standards are not or cannot be complied with"<sup>8</sup>.

Veterinary experts and scientists have long advocated for changes in the export of live animals.

On 31 October 2024, the Federation of Veterinarians of Europe (FVE) reiterates its call to reduce the transport of animals as much as possible. They ask for an urgent revision of Council Regulation EC 1/2005 to prevent the suffering of animals during long-distance transports,

i.a. referring to recent events at the Bulgarian-Turkish border<sup>9</sup>. FVE states that "these repeated tragedies highlight systemic failure in cross-border animal transport regulations that are causing severe animal suffering and risking animal welfare standards across the EU."<sup>10</sup> Concerning the export of live animals, **FVE recommends restricting the export to countries with known welfare standards.**

On 12 February 2025, the **German Veterinary Association for Animal Welfare (TVT) reiterates its call to ban the export of farmed animals to third countries that are so-called high-risk countries for animal welfare.** TVT states that it is demonstrably not possible to carry out a long-distance transport to countries outside Europe without causing pain, suffering and harm to the animals. Other factors must be considered as uncertainties at the borders and along the route that cannot be anticipated in advance. These may include a rapidly changing epidemiological situation, incomplete documentation, strikes, and unpredictable weather events such as floods, storms, heatwaves, cold snaps, earthquakes, and war conflicts.<sup>11</sup>

The European Food Safety Authority (EFSA) states in its 2022's opinion on the welfare of cattle during transport that "export of cattle by road involves risks for the welfare of the transported animals, some of them difficult or impossible to control such as delays in leaving the EU, handling and journey breaks outside the EU. In addition, the legal protection of these animals after leaving the EU is unknown. Thus, export by road likely involves more hazards and higher exposure to hazards than intra-EU transport."<sup>12</sup> Concerning live export by sea, EFSA highlights that "transport of cattle in livestock vessels increases risks for the welfare of the animals, as they are exposed to additional hazards, as compared to road transport. Among the additional hazards and concerns for animal welfare are microclimatic conditions during the waiting time in ports and during the journey, motion arising from sea conditions and post-journey handling."<sup>13</sup>

And yet exports of live animals from the EU to third countries without animal welfare guarantees continue up to date.

This dossier at hand summarizes the challenges and inconsistencies that Animals' Angels and Animal Welfare Foundation (AWF) have documented in exports of animals to various third countries over the past 15 years. We have observed the immense suffering of animals during transportation, at borders, and in places outside the EU where animal welfare is of no importance at all. The dossier includes the third countries where we work and for which we have received reliable information.

We have seen too many animals stuck for days and weeks on board the transport vehicles in unbearable conditions, abandoned to their fate, dying in agony or being handled and slaughtered under conditions that would be considered animal cruelty under EU law. We have documented too many atrocities where the competent authorities in the EU and third countries turned a blind eye or only acted when it was far too late for the animals.

We want to emphasize that the cases documented in this report are only a few examples of what we have observed. Since we often learn about these cases by chance, when informed by those involved, it is important to note that many more cases exist, but they are frequently hidden from public view.

<sup>2</sup> <https://ec.europa.eu/eurostat/> / Please note: Eurostat data for 2024 was not yet available.

<sup>3</sup> [https://www.animals-angels.de/fileadmin/user\\_upload/03\\_Publikationen/Dokumentationen/Export\\_of\\_Live\\_Animals\\_to\\_non-EU\\_Countries.pdf](https://www.animals-angels.de/fileadmin/user_upload/03_Publikationen/Dokumentationen/Export_of_Live_Animals_to_non-EU_Countries.pdf) / <https://www.animals-angels.de/en/projects/animal-transport/eu-exports.html> / <https://www.animal-welfare-foundation.org/en/projects/animal-transport/live-exports-by-road/> / <https://www.animal-welfare-foundation.org/en/projects/animal-transport/live-exports-by-sea/> / <https://www.youtube.com/watch?v=uuHUanoR7Ng> / ZDF documentation: <https://www.youtube.com/watch?v=-YHC6gADcN4&t=4s>

<sup>4</sup> <https://data.consilium.europa.eu/doc/document/ST-12653-2024-INIT/en/pdf>

<sup>5</sup> [https://www.bmel.de/SharedDocs/Downloads/EN/\\_Animals/position-paper-eu-legislation-animal-transport.pdf?\\_\\_blob=publicationFile&v=2](https://www.bmel.de/SharedDocs/Downloads/EN/_Animals/position-paper-eu-legislation-animal-transport.pdf?__blob=publicationFile&v=2)

<sup>6</sup> [https://www.bmel.de/SharedDocs/Downloads/DE/\\_Tiere/Tierschutz/eckpunkte-tiertransporte.pdf?\\_\\_blob=publication-File&v=2](https://www.bmel.de/SharedDocs/Downloads/DE/_Tiere/Tierschutz/eckpunkte-tiertransporte.pdf?__blob=publication-File&v=2)

<sup>7</sup> 2020/2269(INI)

<sup>8</sup> [https://www.europarl.europa.eu/doceo/document/A-9-2021-0350\\_EN.html#\\_ftn38](https://www.europarl.europa.eu/doceo/document/A-9-2021-0350_EN.html#_ftn38)

<sup>9</sup> <https://www.animals-angels.de/neuigkeiten/beitrag/animals-angels-fordert-stopp-von-tiertransporten-in-die-tuerkei.html>  
<sup>10</sup> <https://fve.org/publications/fve-calls-to-prevent-suffering-of-animals-in-long-distance-transport/>

<sup>11</sup> [https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.tierschutz-tvt.de/alle-merkblaetter-und-stellungnahmen/%3Fno\\_cache%3D1%26download%3DOffner\\_Brief\\_TV\\_T\\_Export\\_von\\_Rindern\\_12.02.2025.pdf%26did%3D416&ved=2ahUKEwjL\\_a3q6OOLAxW3RPEDHWr4EpUQFnoECBgQAQ&usq=AOvVaw22YG5WDSsCFFkO57yaF-6pu](https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.tierschutz-tvt.de/alle-merkblaetter-und-stellungnahmen/%3Fno_cache%3D1%26download%3DOffner_Brief_TV_T_Export_von_Rindern_12.02.2025.pdf%26did%3D416&ved=2ahUKEwjL_a3q6OOLAxW3RPEDHWr4EpUQFnoECBgQAQ&usq=AOvVaw22YG5WDSsCFFkO57yaF-6pu)

<sup>12</sup> EFSA AHAW Panel (EFSA Panel on Animal Health and Welfare), Nielsen SS, Alvarez J, Bicout DJ, Calistri P, Canali E, Drewe JA, Garin-Bastuji B, Gonzales Rojas JL, Gortazar Schmidt C, Michel V, Miranda Chueca MA, Padalino B, Pasquali P, Roberts HC, Spoolder H, Stahl K, Velarde A, Viltrop A, Winckler C, Earley B, Edwards S, Faucitano L, Marti S, de La Lama GCM, Costa LN, Thomson PT, Ashe S, Mur L, Van der Stede Y and Herskin M, 2022. Welfare of cattle during transport. EFSA Journal 2022;20(9):7442, 121 pp. <https://doi.org/10.2903/j.efsa.2022.7442>

<sup>13</sup> Ibid.

## II. CURRENT EU LEGISLATION RELEVANT FOR LIVE EXPORT TO THIRD COUNTRIES

### Article 13 TFEU<sup>14</sup>

**“In formulating and implementing the Union’s agriculture, fisheries, transport, internal market, research and technological development and space policies, the Union and the Member States shall, since animals are sentient beings, pay full regard to the welfare requirements of animals (...).”**

This means that the EU recognizes animals as sentient beings and sets animal welfare as a key principle to be fully considered.

### Judgement of the European Court of Justice, Case C-424/13

On 23 April 2015, the European Court of Justice (ECJ) ruled in Case C-424/13<sup>15</sup> that the protection of animals transported under EU law does not stop at EU borders but applies until the final place of destination of the animals, regardless of whether this is inside or outside the EU territory.

The Court justified its decision of extraterritorial dimensions by arguing i.a. that the protection of animal welfare is a legitimate objective in the public interest and that its importance is clearly reflected in the Member States’ adoption of Article 13 TFEU.

### Precautionary Principle of Article 3 of Council Regulation EC 1/2005

**“No person shall transport animals or cause animals to be transported in a way likely to cause injury or undue suffering to them.”**

This means that the competent authorities are entitled and obliged to prohibit a transport if there is a risk that the animals or a part of them could suffer injury, pain or unnecessary suffering and if it is not possible to avert this risk with a high probability by taking certain measures.

Further, animals shall only be transported if, among others:

- all necessary arrangements have been made in advance to minimise the length of the journey and meet the animals’ needs during the journey, Art. 3 (a)
- the animals are fit for the journey, Art. 3 (b)
- the means of transport are designed, constructed, maintained and operated so as to avoid injury and suffering and ensure the safety of the animals, Art. 3 (c)
- the personnel handling animals are trained or competent as appropriate for this purpose and carry out their tasks without using violence or any other method likely to cause unnecessary fear, injury or suffering, Art. 3 (e)
- the transport is carried out without delay to the place of destination and the welfare conditions of the animals are regularly checked and appropriately maintained, Art. 3 (f)
- water, feed and rest are offered to the animals at suitable intervals and are appropriate in quality and quantity to their species and size, Art. 3 (h)

<sup>14</sup> Treaty on the Functioning of the European Union

<sup>15</sup> Judgment of the Court (Fifth Chamber) of 23 April 2015 *Zuchtvieh-Export GmbH v Stadt Kempten*, Case C-424/13, <https://curia.europa.eu/juris/document/document.jsf?text=&docid=163872&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=183640>

### Maximum allowed transport times, feeding, watering and resting intervals

Animals must be transported, watered, fed and rested according to the provisions of the Regulation EC 1/2005, Art. 3 in connection with Annex I Chapter III point 2.7 and Chapter V point 1.4 and 1.5.

The allowed journey time for cattle, sheep and goats is 29 hours, including a minimum of one hour rest on board the truck after 14 hours. After 29 hours, the animals shall be unloaded at a control post and rested for 24 hours, before the journey to the place of destination can be continued<sup>16</sup>. Pigs may be transported for a maximum of 24 hours and must have continuous access to water during the journey. They must then be unloaded at a control post for the 24 h rest<sup>17</sup>.

→ It applies also on the journey leg outside the European Union according to ECJ’s decision C-424/13.

### Realistic planning of long journeys

In accordance with Art. 5 of Regulation EC 1/2005, organisers must provide a journey log which is realistic and shows that the provisions of Regulation EC 1/2005 are complied with.

The organisers are responsible for planning the journeys and ensuring the welfare of the animals during the journey. The planning must include all stages of the journey up to the final destination<sup>18</sup>.

The calculation of the journey time shall include loading and unloading operations, watering, feeding and resting periods, breaks for drivers, time for border crossings, customs controls in transit countries and in the importing country, road conditions and realistic travel speeds and travel times etc.

If a 24-hour rest stop is required during the journey in a non-EU country, the organiser must designate a place for the rest stop which is either a control post or provides facilities equivalent to those of an approved control post (ECJ ruling C-424/13).

The competent authority in the Member State must check according to Art. 21 par. 2(b) and 4 of Regulation (EU) 2017/625, whether the information provided by the organiser on the route planning, the accessibility of control posts and resting stations outside EU and their capacity is realistic and meets the requirements of the EU regulations.

The approval of long journeys to third countries without the possibility to rest animals at control posts or non-EU resting facilities in the intervals described above is not permitted under Regulation EC 1/2005.

### In the event of emergencies and delays during transport

In accordance with Art. 11 par. 1 lit. b (iv) of Regulation EC 1/2005, competent authorities shall only grant authorisations to transporters carrying out long journeys when i.a. they provide contingency plans in the event of emergencies. This should actually also include what to do in cases of rejections at borders and import refusals.

According to Art. 21 par. 3 of Regulation EU 2017/625, the competent authorities shall not detain animals during the transport unless it is strictly necessary for animal welfare or animal and human health reasons. If animals have to be detained during transport for more than two hours, the competent authorities shall ensure that appropriate measures are taken for their care and, where necessary, their feeding, watering, unloading and accommodation.

<sup>16</sup> Annex I Chapter V point 1.4 (d) and 1.5 of Regulation EC 1/2005

<sup>17</sup> Annex I Chapter V point 1.4 (b) and 1.5 of Regulation EC 1/2005

<sup>18</sup> Final destination is the place with an address where the animals will stay for more than 48 hours or the place where the animals will be slaughtered.

**Measures to be taken in cases of import refusal of animals to third countries**

Where a third country rejects ungulates, including e.g. cattle, sheep, goats and pigs, originating in the EU, the animals may only return to the EU if the animal health requirements laid down in Article 178 of Commission Delegated Regulation (EU) 2020/692<sup>19</sup> are fulfilled.

However, this is only possible when the third country refusing entry of animals is listed in Annex II of the Commission Implementing Regulation (EU) 2021/404<sup>20</sup>. Currently, there are only listed eight countries in Annex II: Chile, Greenland, Iceland, Canada, New Zealand, Switzerland, United Kingdom, and USA.



**None of the importing third countries mentioned in this dossier are listed in Annex II. This means that in the event of import refusal from these third countries, the animals cannot return to the EU.**

The EU Commission refers in their answer to the parliamentary question P-002586/2024 that *“the measures applicable to animals re-entering the Union from unauthorised third countries are laid down in Article 66 (3) of Regulation (EU) 2017/625.”*<sup>21</sup>

These measures include i.a.:

- a) “destruction” of the consignment – i.e. the killing of the animals which is a highly questionable practice, especially if healthy and pregnant animals are involved,
- b) re-dispatch of the consignment outside the EU – i.e. that the animals should be exposed to further (long) transport to another non-EU country which is highly questionable from an animal welfare point of view, or
- c) subject the consignment to special treatment and, where appropriate, allocate the consignment for purposes other than those for which it was originally intended - unclear what this would mean in practice in the case of live animals.

Further, Article 66 (3) of Regulation EU 2017/625 reads: “Any action referred to in points (a), (b) and (c) (...) shall be performed in compliance with the rules referred to in Article 1(2), **including in particular, as regards consignments of live animals, those intended to spare animals any avoidable pain, distress or suffering.**”

<sup>19</sup> [https://eur-lex.europa.eu/eli/reg\\_del/2020/692/oj/eng](https://eur-lex.europa.eu/eli/reg_del/2020/692/oj/eng)

<sup>20</sup> [https://eur-lex.europa.eu/eli/reg\\_impl/2021/404/oj/eng](https://eur-lex.europa.eu/eli/reg_impl/2021/404/oj/eng)

<sup>21</sup> [https://www.europarl.europa.eu/doceo/document/P-10-2024-002586-ASW\\_EN.html](https://www.europarl.europa.eu/doceo/document/P-10-2024-002586-ASW_EN.html)

**III. INTERNATIONAL ANIMAL WELFARE STANDARDS**

The internationally agreed animal welfare standards of the World Organisation for Animal Health (WOAH) include chapters on animal transport by sea and land (Chapters 7.2 and 7.3 of the Terrestrial Animal Health Code, TAHC).

**All importing third countries mentioned in this dossier are WOAH members and accordingly the standards must be followed by all of them.**

→ Article 7.3.11. TAHC – Action in the event of an import refusal<sup>22</sup>:

1. The welfare of the animals should be the first consideration in the event of a refusal to allow the completion of the journey.
2. When the animals have been refused import, the Competent Authority of the importing country should make suitable isolation facilities available to allow the unloading of animals from a vehicle and their secure holding (...).
3. If a Competent Authority requires the animals to remain on the vehicle, the priorities should be:
  - a) to allow provisioning of the vehicle with water and feed as necessary;
  - b) to **provide urgently the reasons for the refusal**;
  - c) to **provide urgent access to an independent veterinarian(s)** to assess the health status of the animals, (...)
  - d) to **provide access to allow continued assessment of the health and other aspects of the welfare of the animals**, and the necessary actions to deal with any animal issues which arise.

WOAH should be contacted by the exporting and importing countries for mediation if the problems cannot be solved immediately.

**IV. COUNTRY REPORTS****1. Türkiye**

**Why animal transports from the EU to Türkiye shall not be approved:**

- There is a **lack of control for the non-EU leg of the journey.**
- **(Very) long waiting times and transport delays** at Bulgarian-Turkish border Kapıkule.
- There are **no contingency plans and no animal welfare procedures in the event of import refusal**, causing severe animal suffering and even death.
- **Return of animals into the EU** not permitted in case of rejection at Turkish border, due to conflicting EU animal health laws.
- There are **no control posts (or stables equivalent to them) for animals in Türkiye** to perform their obligatory rest after 29 hours of journey.
- Türkiye is considered a so-called **‘animal welfare high-risk country’.**
- **No implementation of the EU and Turkish animal welfare legislation / no animal welfare guarantees in Türkiye**, i.e. when leaving EU territory, the animals are deprived from their protection status to which they are entitled in the EU.

<sup>22</sup> Similar provisions for sea transports, see Article 7.2.11. TAHC

**Background:**

According to Eurostat data, 188,819 bovines and 4,124 ovines were exported from the EU to Türkiye in 2023. The main exporting EU countries for cattle were Bulgaria, Hungary, Czechia and Romania, and for sheep and goats only Bulgaria. Between 2015 and 2023, the EU exported nearly 1.9 million cattle and almost 400,000 sheep and goats to Türkiye.<sup>23</sup>

**Theory vs. Reality:**

**1. (Very) long waiting times and transport delays at the Bulgarian-Turkish border Kapıkule**

Between 2010 and 2021, AWF and Animals' Angels inspected 833 animal trucks at the Bulgarian-Turkish border of Kapitan Andreevo/Kapıkule, destined to third countries, mainly Türkiye.

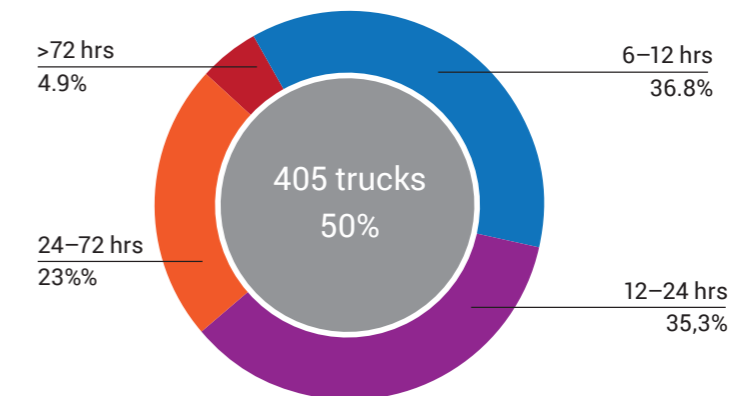
Waiting times at the border: almost 50% of the trucks (= 405 trucks) waited for more than 6 hours. Of these, nearly 37% of trucks waited between 6–12 hours, 35% between 12–24 hours, 23% waited one day up to three days and nearly 5% more than three days. Even some trucks waited 10 days and more. **During the whole waiting time, the animals were not emergency unloaded but had to remain on board the trucks.**

**Table 1:**  
Examples of animal trucks stuck at the Bulgarian-Turkish border, documented by AWF and Animals' Angels between 2011 - 2024

MONTH AND YEAR	ANIMALS INVOLVED	WAITING TIMES AT BG-TR BORDER	REMARKS
May 2011	630 lambs from Hungary	1.5 days	Additional waiting time at TR customs: 2 days + engine break-down: 0.5 days; in total, 42 dead lambs
November 2012	Bulls from Latvia	7 days	Destined to Iraq.
October 2014	28 pregnant buffaloes from Italy	6 days	All animals survived, because we ensured all the time the bulls were watered and fed twice a day, the temperatures were moderate.
April 2016	70 calves from Belgium	> 15 days	No information about injured, sick or dead animals available.
April–May 2016	130 calves from Austria	> 10 days	Animals were sent to a Bulgarian slaughterhouse where 13 calves died and 21 disappeared; the remaining animals were slaughtered.
June - July 2017	284 bulls from Czech Republic	Nearly 4 weeks	At least 20 bulls died; surviving animals re-loaded on Turkish trucks and further transported to Iraq.
July 2018	41 buffaloes from Slovakia	> 57 hours	Two buffaloes died.
July 2018	French + Czech cattle	11 days	At least two bulls died.
August–September 2023	41 cattle, including pregnant heifers, from Romania and one animal from Germany	26 days	3 dead heifers, newborn calves on board, including at least one dead; surviving animals transported to Iraq.
September- October 2024	69 pregnant heifers from Germany	Nearly 4 weeks	15 heifers gave birth on board–13 calves and 8 heifers died on board; three downer cows. The surviving animals ended up in a Turkish slaughterhouse.
October 2024	47 heifers for breeding from Romania	15 days	At least six heifers died; the surviving animals were slaughtered in a Turkish slaughterhouse.

<sup>23</sup> <https://ec.europa.eu/eurostat> / Please note: Eurostat data for 2024 was not yet available.

**Figure 2:**  
(Very) long waiting times of more than 6 hours at the Bulgarian-Turkish border, documented by AWF and Animals' Angels between 2010–2021.



The reasons for very long waiting times on the Turkish side of the Bulgarian-Turkish border are manifold, including lengthy administrative customs procedures and the limited working hours of the Turkish veterinary authorities at the border.<sup>24</sup>

Further transport delays arise from missing payments, lack of preparedness, errors in the animal health certificates, incorrect information regarding the weight of the animals, missing or incorrect details of animals' ear tags, discrepancies in the vaccination records and dates, missing import authorizations or absent import documents – the list is not exhaustive.

→ When delays occur, no measures are taken to protect the welfare and health of the transported animals, which is a serious violation of Council Regulation EC 1/2005<sup>25</sup> and Regulation EU 2017/625<sup>26</sup>.

According to Article 31 par. 3 of the Turkish legislation on the protection of animals during transport<sup>27</sup>, in cases where an animal transport must be detained for more than two hours, the competent authority at the border control point shall ensure that appropriate measures are taken for the care, feeding, watering, unloading and sheltering of the animals.

→ This provision is systematically ignored in Türkiye.

**2. No contingency plans and no animal welfare procedures in the event of import refusal**

The recent disasters at the Turkish border Kapıkule have demonstrated once again in a horrific way that 1.) there are no specific contingency plans or procedures in place to safeguard the welfare of the animals and 2.) the EU and Turkish authorities fail to implement animal welfare measures in emergency situations, e.g. when animal transports are rejected at the border.

*N.B.: Within the Turkish border at Kapıkule, there is a stable with pens. However, it is not used for unloading and resting of animals in cases of emergencies; rather, it is solely used for conducting blood tests when necessary. In the event of an import refusal, the animals remain stuck on board the trucks, which are often parked beside the empty stable.*

**EU authorities have no powers outside the EU**, i.e. they cannot effectively intervene once the animals have left EU territory. When the animals enter Türkiye, they can no longer be protected by EU rules, which Türkiye is not obliged to follow, and in fact, they are not protected by Turkish animal welfare legislation, which is systematically flouted, as are the WOH standards. **In cases of rejections at the Turkish border and import refusal of the animals, EU animal health regulations do not allow the return of European animals from Türkiye.**<sup>28</sup>

<sup>24</sup> At least six hours must be calculated on average to get clearance for an animal transport at the Turkish customs in Kapıkule.

See: DG(SANTE)2019-6834, p. 14

<sup>25</sup> Art. 3 lit. a, f, h, Art. 11 par. 1 lit. b (iv), Art. 22 par. 1 and Annex I Chap. III point 2.7

<sup>26</sup> Art. 21 par. 3

<sup>27</sup> <https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=15647&MevzuatTur=7&MevzuatTertip=5>

<sup>28</sup> Türkiye is not listed in Annex II of Implementing Regulation (EU) 2021/404 in connection with Article 178 of Commission Delegated Regulation (EU) 2020/692.

**Observations by AWF and Animals' Angels in 2024:**

- Between 16.09.–15.10.2024, two transports of 69 pregnant heifers from Germany were detained at the Turkish border in Kapıkule – in total, nearly four weeks.<sup>29</sup>

The conditions for the animals on board the trucks were indescribably cruel: they were soaked and trapped in a thick layer of excrement, suffering from thirst, hunger, and a lack of space. The heavily pregnant animals grew weaker, and their health became severely compromised due to the prolonged confinement inside the trucks. 15 heifers gave birth to their calves who had no chance of survival. Three heifers became downers and were unable to stand. Eight heifers and 13 newborn calves on board died slowly in appalling conditions. The surviving pregnant heifers were sent to a Turkish slaughterhouse, where they were slaughtered without stunning, causing them not only immense pain and suffering but also to their unborn calves who suffocated during the bleeding of their mothers<sup>30</sup>. The downer cow 'Hope' was initially thought to be dead at the slaughterhouse and was left on board the truck, alongside the corpses. It wasn't until the following day at the garbage dump, that she was killed and released from her long and unbearable suffering.



[www.zdf.de/dokumentation/37-grad/37-schutzlos-ausgeliefert-100.html](https://www.zdf.de/dokumentation/37-grad/37-schutzlos-ausgeliefert-100.html)  
[https://www.youtube.com/watch?v=-kg-\\_2-Xbol](https://www.youtube.com/watch?v=-kg-_2-Xbol)

Reason for import refusal by Turkish authorities: discrepancies between Turkish administrative and veterinary law<sup>31</sup>.

Animal welfare measures taken by the competent authorities: **none**.

→ Severe and prolonged suffering was caused to the animals who were left to die miserably for days and weeks while in the custody of authorities.



Dead heifer left on board the truck.

Downer cow 'Mercy' at the Turkish slaughterhouse.

<sup>29</sup> [Redacted]  
<sup>30</sup> Rindergesundheitsdienst der TSK Baden-Württemberg: <https://www.tsk-bw.de/wp-content/uploads/2020/12/17-Tier-schutz-Schlachtung-hochtragender-Tiere.pdf>  
<sup>31</sup> Türkiye refused to import these animals because they came from a German region affected by bluetongue.



Cow Hope, still alive and buried under dead bodies of calves and heifers when brought to the garbage dump in Türkiye. Copyright: Animals' Angels, AWF, Karremann

- Between 18.10.–01.11.2024, a transport of 47 breeding heifers from Romania was detained at the Turkish border in Kapıkule for 15 days.<sup>32</sup>

Once again, the animals were left sick and dying inside the truck. At least six heifers perished, some aboard the truck, while others succumbed outside during the unloading process after a few hours at the Turkish border, in a temporary self-made pen located in the parking area, following 15 days of confinement inside the vehicle. Some heifers laid down on the pavement inside the customs area, looking apathetic and sick, coughing and sticking their tongues out. Some had their bodies covered in excrement. In the end, Türkiye ordered the surviving heifers to be taken to the slaughterhouse. However, the body of at least one deceased heifer ended up in a waste container inside the customs area of the border.



<https://www.youtube.com/watch?v=j3RawVxfQFM>

Reason for import refusal by Turkish authorities: discrepancies between Turkish administrative and veterinary law.<sup>33</sup>

Animal welfare measures taken by the competent authorities: **none**.

→ Again, the animals were subjected to severe and prolonged suffering and death while in the custody of authorities.

<sup>32</sup> [Redacted]  
<sup>33</sup> Türkiye refused to import the animals because they came from a region of Romania affected by the Peste des Petits Ruminants (PPR).



Dead heifer, next to truck.



Sick heifer next to dead one.

→ These are not isolated cases – examples from 2023 and 2017:<sup>34</sup>

- Between 18.08.–16.09.2023, a transport of 41 cattle including 27 pregnant heifers from Romania was stuck at the Turkish border in Kapıkule - in total, almost four weeks.<sup>35</sup>

According to the information received, the health and welfare of these animals deteriorated over time and several animals died. After almost a month of confinement on board the truck, the unfit animals were unloaded for just four hours and then transported on another long journey of around 2,000 km to Iraq.

The reason for refusing the animals to enter Türkiye was apparently that according to Turkish officials the animals did not have the mandatory vaccines to enter the country.

- Between 14.06.–11.07.2017, 22 trucks with Czech bulls were stuck at the Turkish border in Kapıkule - nearly four weeks; additional transport to Iraq<sup>36</sup>

Already between 05.- 09.06.2017, 22 transports with almost a thousand bulls started from Czech Republic to Türkiye. Due to irregularities in the weight of the animals and customs problems, the animals were not allowed to enter Türkiye. An odyssey began for them.

On 14.06.2017, the 22 trucks finally entered the border but got stuck on the Turkish side – again due to customs problems. After three days confined on board the trucks inside the border, the bulls were eventually unloaded at two stables in Kapıkule and stayed there until 11.07.2017 – for nearly one month. During this time, at least 20 bulls died.

On 11.07.2017, 284 of the detained Czech bulls were loaded on 11 Turkish cargo trucks which are not suitable for the transport of animals (e.g. no watering devices, no roof protection from sun at temperatures up to 41°C, no bedding, no food carried on board). The animals including unfit ones were transported for further 2,000 km to Duhok, Iraq.

The transport took four days – under appalling conditions: 24 bulls were severely sick with pneumonia, respiratory difficulties, diarrhoea, severely lame on one to four legs, with swollen joints (double the size) and arched backs.

[https://www.youtube.com/watch?v=PmhdmkX\\_egw&t=57s](https://www.youtube.com/watch?v=PmhdmkX_egw&t=57s)



<sup>34</sup> Please see also examples mentioned in point 1) concerning long waiting times at the BG-TR border.

<sup>35</sup> [Redacted]

<sup>36</sup> [Redacted]



Exhausted Czech bull, soiled with excrement on board a Turkish cargo truck. After being stuck at the Turkish border for weeks, he and the other bulls were further transported to Iraq. Lack of space, no protection from weather, no bedding, no food, no water and no safety on board the Turkish cargo trucks.



For almost 15 years, AWF and Animals' Angels have been denouncing the disasters and manifold animal welfare problems on this export route to the competent authorities in the EU and Türkiye.

Fact is that up to date:

- EU and Turkish laws on the protection of animals during transport are not implemented in practice, nor are the international WOH standards.
- The ECJ ruling C-424/13 is not enforced.
- The EU Member States have failed to enforce the current rules, and the EU Commission has failed to bring about real improvements for the animals on the export route to Türkiye.
- Türkiye is considered a so-called 'animal welfare high-risk country'<sup>37</sup>.
- In Türkiye, the animals face cruel slaughter practices, including live hoisting the fully conscious animal by one leg before cutting the throat – without stunning and often with short knives and several cuts<sup>38</sup>.

Please note: It is completely contradictory that, on the one hand, animals are to die in agony on trucks because of originating from allegedly high-risk areas for animal diseases, and on the other hand, their bodies are dumped afterwards on open landfills and even waste containers where they are left to decay without any biosecurity measures, at all. Wild animals, birds and stray animals feed on their bodies, increasing the risk of disease spread.



<https://www.youtube.com/watch?v=DeV7mGxKADc>

<sup>37</sup> Maisack, C & Rabitsch, A. Transporte von Rindern und Schafen in Tierschutz-Hochrisikostaaen gehen weiter\* in: Amtstierärztlicher Dienst und Lebensmittelkontrolle, 27 – 1/2020, p. 37-46

<sup>38</sup> <https://www.youtube.com/watch?v=1xv7l-jyQMo&t=21s> Live export: beyond borders, beyond imagination, min 14:56 –16:10. <https://www.eyesonanimals.com/illustration-of-captive-bolt-stunning-at-a-cattle-abattoir-in-izmir-turkey/>

## 2. Morocco

### Why animal transports from the EU to Morocco shall not be approved:

- There is a **lack of control** for the non-EU leg of the journey.
- There is a **lack of infrastructure in Morocco**. This includes unloading facilities at ports, i.e. imported animals are not unloaded in case of emergencies and transport delays.
- There are **no contingency plans and no animal welfare procedures in the event of an import refusal**, causing severe animal suffering and even death.
- **Return of animals into EU not permitted** in case of rejection at Moroccan border, due to conflicting EU animal health laws.
- Morocco is considered a so-called **'animal welfare high-risk country'**.
- There is **no animal welfare legislation / no animal welfare guarantees in Morocco**, i.e. when leaving EU territory, the animals are deprived from their protection status to which they are entitled in the EU.

### Background:

Between 2015 and 2023, the EU exported nearly 400,000 cattle to Morocco. The export of sheep to Morocco began to increase rapidly in 2023.<sup>39</sup> According to Eurostat data, 90,711 cattle and 396,768 sheep were exported to Morocco in 2023. Main exporter for both, cattle and sheep, is Spain, followed by France and Germany in the case of cattle and Portugal and Romania in the case of sheep.

### Theory vs. Reality:

#### 1. Lack of infrastructure at the port of Tanger-Med, Morocco

When animals are transported by truck from the EU to Morocco, they have to cross the Mediterranean Sea on a roll-on-roll-off ferry (Ro-Ro ferry). Common ports of departure for these combined road-sea journeys by Ro-Ro ferry are e.g. the Spanish port of Algeciras or the French port of Marseille. In Morocco, they arrive at the Moroccan port of Tanger-Med. However, the port of Tanger-Med lacks proper infrastructure related to the transport of animals.

Lack of unloading facilities: In the event of transport delays due to import refusal or in an emergency situation, there is no adequate stable at the port of Tanger-Med to unload and accommodate bovine and ovine animals during prolonged waiting times<sup>40</sup>. I.e., the animals have to remain on board the trucks for the time being (see point 2 below).

Lack of shade for parked animal transports: During the waiting times for customs clearance, the trucks have to park in an area where no shade is provided. In summer the trucks are parked in the blazing sun. This can become very critical for the animals confined on board and can cause heat stress and suffering.

#### 2. No contingency plans and no animal welfare procedures in the event of import refusal

The alarming case of 80 Portuguese bulls stuck at the port of Tanger-Med, Morocco, dramatically shows that 1.) there are no specific contingency plans or procedures in place to safeguard the welfare of the animals and 2.) the EU and Moroccan authorities fail to implement animal welfare measures in emergency situations, e.g. when an animal transport is stuck at the border due to import refusal.

<sup>39</sup> <https://ec.europa.eu/eurostat> / Please note: Eurostat data for 2024 was not yet available.

<sup>40</sup> There is a stable building which is equipped with horse boxes and only used for 'sport' horses. It is not used for cattle, sheep or goats. There is not enough space for one or more consignments to be unloaded there.



No shade provided: trucks with Spanish and French animals are parked in the sun during the waiting time (ca. 4h) at the port of Tanger-Med – with outside temperatures up to 38°C. Picture taken on 27.07.2024.

**EU authorities have no powers outside the EU**, i.e. they cannot effectively intervene once the animals have left EU territory. In Morocco, the animals cannot in fact be protected by EU rules, to which Morocco is not obliged. Morocco has no animal welfare laws, and the WOH standards are systematically disregarded.

**In cases of rejections at the Moroccan border and import refusal of the animals, EU animal health regulations do not allow the return of European animals from Morocco.**<sup>41</sup>

### Observations by Animals' Angels:

**Between 03.–22.01.2024, two transports of 80 bulls from Portugal were detained at the Moroccan port Tanger-Med. The animals were confined on board the trucks for 20 days.**<sup>42</sup>

The situation was appalling and the animal suffering immense: The bedding had turned into liquid mixture of excrements and urine, in which the animals stood ankle-deep for weeks. The stench was extreme and the high ammonia concentration inside the animals' compartments caused them respiratory problems and severely inflamed eyes. One bull already died under these unbearable conditions on 08.01.2024. His body was left in the animals' compartment and had turned into an advanced state of decomposition, barely recognizable and trampled by the other animals so that his inner organs were floating in the "bedding of manure", full of worms and maggots.

Reason for import refusal by Moroccan authorities: only because of economic interests due to discrepancies in customs tariffs and missing payments.

Animal welfare measures taken by the competent authorities: **none.**



<https://www.animals-angels.de/port-tanger-med>

<sup>41</sup> Morocco is not listed in Annex II of Implementing Regulation (EU) 2021/404 in connection with Article 178 of Commission Delegated Regulation (EU) 2020/692.

<sup>42</sup>



Bull Arturo with ocular and nasal discharge, unable to open his eyes.



Dead body of Luiz, his organs and decomposed body floating in the liquid "bedding material" and trampled by other animals.

- The animals were subjected to severe and prolonged suffering and death while in the custody of authorities.
- Council Regulation EC 1/2005 was severely violated as well as the international animal welfare standards of WOAAH.
- The ECJ ruling C-424/13 is not enforced.

N.B.: In a presentation during an international animal welfare meeting, a representative of the Moroccan National Office for Sanitary Safety of Food Products (ONSSA) stated that "despite the absence of specific national regulations on animal welfare, AW requirements are applied during long transport (import, export and transit)"<sup>43</sup>.  
 → Obviously, this was not the case for these 80 Portuguese bulls who were not even granted the minimum animal welfare requirements such as emergency unloading.

Another example: Three transports of German heifers, stuck at the port of Tanger-Med in November 2021

In total, the 102 pregnant animals were confined on board the trucks for more than three days. Reason: The buyer missed a deadline to apply for authorisation from ONSSA, the Moroccan Food Safety and Animal Health Authority, to unload and accommodate the animals in the foreseen quarantine stable. The certificate "Decision d'Approbation du Dossier de Mise en Quarantaine du Bétail Importé" of ONSSA was therefore missing for animal health reasons because the quarantine stable was disinfected but the necessary waiting period of four days had not yet expired. As consequence, the trucks were stuck at the port of Tanger-Med – with the animals on board. Again, the Moroccan authorities did not take any animal welfare measures, such as emergency unloading.

### 3. No animal welfare guarantees in Morocco

**Up to the present day, Morocco has not yet adopted a national animal welfare legislation.**

There is no regulatory framework that lays down specific rules on the protection and welfare of farmed animals during transport, on-farm management, at markets or during slaughter.

Morocco is WOAAH member, but the international animal welfare standards are systematically ignored in the country.

#### Case study at markets and adjacent slaughterhouses by Animals' Angels:

Animals' Angels carried out an intensive field study on European 'dairy' cows sold and slaughtered at local markets in Morocco between 2019 and 2023.<sup>44</sup>

Table 2: Overview of EU cattle observed at local markets and adjacent slaughterhouses in Morocco between 2019–2023

OBSERVATION YEAR	NO. OF VISITS	NO. OF EU CATTLE	ORIGIN OF ANIMALS
2019	1x Mers El Kher 1x Sidi Bennour 1x Souhila	In total, 21 'dairy' cows and 5 'slaughter' bulls	Cows: DE, FR, NL Bulls: ES
2020	2x Mers El Kher 1x Sidi Bennour	In total, 14 'dairy' cows and 1 bull	Cows: AT, DE, FR, NL Bulls: ES
2022	2x Mers El Kher 1x Sidi Bennour	In total, 22 'dairy' cows and 2 bulls	Cows: DE, FR, NL Bulls: ES
2023	1x Mers El Kher 1x Sidi Bennour 1x Souhila	In total, 26 'dairy' cows	AT, DE, FR
<b>2019 - 2023</b>	<b>12 visits</b>	<b>&gt;91 cattle from EU</b>	<b>AT, DE, ES, FR, NL</b>

<sup>43</sup> <https://tr-middleeast.woah.org/en/events/multi-regional-whole-journey-scenario-2/>

<sup>44</sup> [www.animals-angels.de/eu-cows-morocco](https://www.animals-angels.de/eu-cows-morocco); [https://www.animals-angels.de/fileadmin/user\\_upload/03\\_Publikationen/Dokumentationen/Export\\_of\\_Live\\_Animals\\_to\\_non-EU\\_Countries.pdf](https://www.animals-angels.de/fileadmin/user_upload/03_Publikationen/Dokumentationen/Export_of_Live_Animals_to_non-EU_Countries.pdf)

Observations at markets and slaughterhouses:

The conditions at the markets and their adjacent slaughterhouses are extremely poor and up to date, animal welfare does not play any role. Inappropriate multipurpose transport vehicles are used and brutal handling during loading is common practice:

- Animals unfit for transport are sold at the market, including emaciated, weak, injured and sick animals, e.g. suffering from painful mastitis, as well as severely lame animals and neglected animals with overgrown claws.
- Downer cows are not granted veterinary treatment but are left to their fate.
- Cattle are blindfolded and/or have their legs tied.
- Animals with broken horns or bloody noses are observed.
- Unweaned calves, with umbilical cord still visible, with sunken flanks and diarrhoea.
- Beating, kicking, dragging, tail-twisting and excessive use of electric prods observed during loadings.
- Loading without ramps, even of cattle onto the second deck of the truck.
- Animals slaughtered by untrained personal at full consciousness under horrific conditions, without proper infrastructure or management.



**We documented more than 91 cattle from the EU including 'dairy' cows at these places, being handled, transported and slaughtered without any animal welfare standards and under conditions that would be classified as animal cruelty by EU law.**

Morocco is considered a so-called 'animal welfare high-risk country'<sup>45</sup>.



[www.animals-angels.de/morocco-markets-2023](http://www.animals-angels.de/morocco-markets-2023)

[www.animals-angels.de/morocco-slaughterhouses-2020-2023](http://www.animals-angels.de/morocco-slaughterhouses-2020-2023)



Loading of French cow Ivette, ear tag no. FR7261181517, blindfolded, no ramp. The loading procedure is very brutal: she falls in a hole next to the truck and cannot get up anymore. The workers kick her, twist her tail, pull heavily at her head and repeatedly use the electric prod to drag her out of the hole. Animal market, Sidi Bennour, Morocco, 14.03.2023.



German cow Eleonora, ear tag no. DE0666176994, slaughterhouse of Mers El Kher, Morocco, 19.03.2022



French cow Carole, ear tag no. FR2550182114, slaughterhouse Mers El Kher, Morocco, 19.03.2022

<sup>45</sup> Maisack, C & Rabitsch, A. Transporte von Rindern und Schafen in Tierschutz-Hochrisikostaaten gehen weiter\* in: Amtstierärztlicher Dienst und Lebensmittelkontrolle, 27-1/2020, p. 37-46

### 3. Lebanon

**Why animal transports from the EU to Lebanon shall not be approved:**

- There is a **lack of control for the non-EU leg of the journey.**
- **Return of animals into the EU not permitted** in case of rejection at Lebanese border, due to conflicting EU animal health laws.
- The **European Court of Justice’s judgment, Case C-424/13 cannot be complied with until final destination**, because most animals are sold inside the port to the final buyer.
- Lebanon is considered a so-called ‘**animal welfare high-risk country**’.
- **No implementation of EU and Lebanese animal welfare legislation / no animal welfare guarantees in Lebanon.** I.e., when leaving the EU territory, the animals are deprived of the protection status to which they are entitled in the EU.
- Due to high feed costs, farmers in Lebanon struggle to provide sufficient nutrition for high-producing animals.
- There is no system in place to ensure the safe disposal of animal by-products not intended for human consumption, posing a significant risk to human and animal health.

**Background:**

According to Eurostat data, 71,521 bovine and 33,097 ovine animals were exported from the EU to Lebanon in 2023. Main exporting EU country for cattle, sheep and goats were Croatia, Spain and Slovenia. Between 2015 and 2023, the EU exported more than 1 million cattle and nearly 820,000 ovine animals to Lebanon.<sup>46</sup>

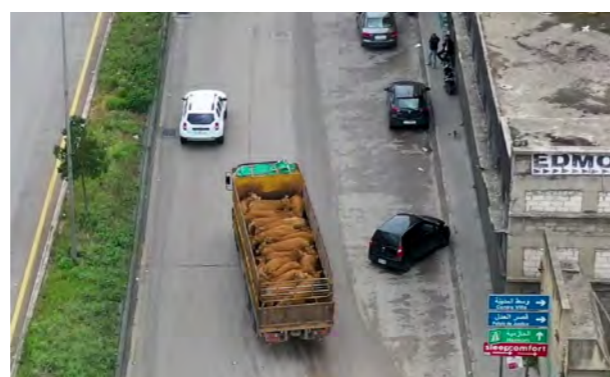
**Theory vs. Reality:**

**1. Non-compliance of EU rules and lack of control for the non-EU leg of the journey**

The export of animals from the EU to Lebanon includes transport by sea on livestock vessels → see chapter V (sea transport, p. 57)

At the port of destination in Lebanon, the animals are unloaded and further transported by local trucks to their final destination.

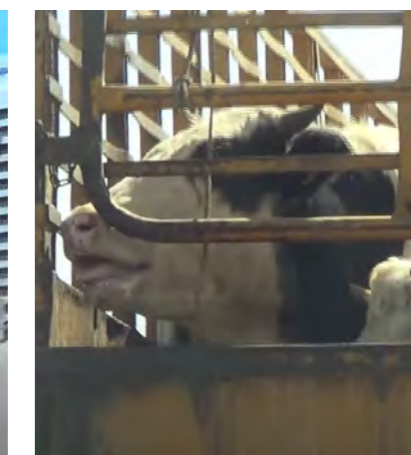
**These local trucks are multi-purpose cargo trucks and not designed for the transport of live animals** as they are not equipped with watering devices, do not have any roof protection from sun, and lack proper loading ramps, among others. They are not approved for long journeys and do not fulfil the EU requirements for animal trucks on long distance.



EU animals unloaded from vessel Med Rose in Beirut, loaded on local Lebanese trucks (red arrows) and waiting to be brought to the stable (21.06.2023). After arrival at port of Beirut and unloading from the vessel Med Rose, the animals are further transported on local trucks to final destination. On board the local trucks, there is no space for the animals (21.06.2023)



Animals unloaded from the vessel Med Rose in Beirut and transported to a farm (21.06.2023). They were loaded in the port of Raša, Croatia. The animals originate from different EU countries, such as Hungary, Czechia, Germany, Slovakia etc.



EU cattle transported on local trucks which are not designed for the transport of animals, after unloading from the vessel Karim Allah at the port of Beirut, 03.10.2018. The animals departed from the port of Raša, Croatia. Animals with Romanian, Czech and Polish ear tags were observed.

Romanian bull suffering from respiratory problems, after sea transport from Raša, Croatia, to Lebanon, 03.10.2018.

- During the sea transport and subsequent onward transport of the animals in Lebanon from the port to the final destination, compliance with Council Regulation EC 1/2005 cannot be guaranteed.
- The ECJ ruling C-424/13 cannot be enforced on the export route to Lebanon.

EU authorities have no powers outside the EU, i.e. they cannot effectively intervene once the animals have left EU territory. When the animals enter Lebanon, they can no longer be protected by EU rules, which Lebanon is not obliged to follow. In cases of rejections of the animals at the Lebanese border and import refusal, **EU animal health regulations do not allow the return of European animals from Lebanon.**<sup>47</sup>

<sup>46</sup> <https://ec.europa.eu/eurostat> / Please note: Eurostat data for 2024 was not yet available.

<sup>47</sup> Lebanon is not listed in Annex II of Implementing Regulation (EU) 2021/404 in connection with Article 178 of Commission Delegated Regulation (EU) 2020/692.

## 2. No animal welfare guarantees in Lebanon

Lebanon is a member of WOAAH and thus committed itself to comply with the WOAAH animal welfare standards.

Lebanon has a national animal welfare legislation, law no. 47 of 2017, which also contains provisions on the transportation of farmed animals, taking reference to the WOAAH animal welfare standards<sup>48</sup>.

However, the effective implementation of law no. 47 and the WOAAH animal welfare standards is highly questionable.

**Lebanon is considered a so-called 'animal welfare high-risk country'**<sup>49</sup>.

In a presentation during an international animal welfare meeting in November 2023, the animal welfare focal point of Lebanon concluded that *"Since the issuing of the Animal Welfare Law, Lebanon is complying progressively with WOAAH AW guidelines, especially in issues related to: (...) animal welfare during long distance transports of animals by sea and by air. Nevertheless, the implementation is sometimes hindered by illegal interventions, lack of budget, lack of awareness of the private sector, training of the veterinary inspectors, etc."*. Further it is stated that *"The financial crisis since October 2019, the COVID-19 pandemic and the blast of Beirut Harbor impacted deeply the normal life in all sectors in the country."*<sup>50</sup>

Due to the current tense political situation in the region, it is unfortunately still to be feared that the conditions will not improve in the near future<sup>51</sup>.

### Observations by Animal Welfare Foundation, 2022–2023:

From August 2022 to June 2023, AWF investigated the export of live animals to Lebanon, the farming practices, the difficulties that farmers must face with providing enough energy and sufficient feed for highly producing European animals, the slaughtering of EU animals and the damaging impact of the 'slaughter waste' to the environment.<sup>52</sup>

#### Import practices:

AWF interviewed three importers who purchase cattle in the EU and other countries. Based on the information received, the import process is as follows:

- 50% to 70% of the cattle are sold at the port. The farmers come to the port and buy the cattle.
- **Typically, there are 1% to 2% casualties during sea transport, including deaths and severe injuries.**
- They prefer to sell the animals directly at the port to avoid the extra costs associated with transporting them to their stables.

**The European Court of Justice's judgement, Case C-424/13, cannot be observed** since most animals are sold inside the port to the final buyer. **The details of the final buyers (local farmers) are not known at the time of departure from the EU ports, meaning that it is impossible to plan the journey to the animals' final destination.**

<sup>48</sup> <https://faolex.fao.org/docs/pdf/leb214601.pdf>

<sup>49</sup> Maisack, C & Rabitsch, A. Transporte von Rindern und Schafen in Tierschutz-Hochrisikostaat en gehen weiter" in: Amtstierärztlicher Dienst und Lebensmittelkontrolle, 27–1/2020, p. 37-46

<sup>50</sup> [https://rr-europe.woah.org/app/uploads/2023/11/11\\_wjs\\_2023\\_lebanon.pdf](https://rr-europe.woah.org/app/uploads/2023/11/11_wjs_2023_lebanon.pdf)

<sup>51</sup> <https://www.bbc.com/news/topics/c8nq32jwjdtd>

<sup>52</sup> Detailed information can be requested from AWF

#### Slaughtering:

During the investigation, AWF visited six slaughterhouses, where all animals are slaughtered without stunning. The veterinarians check the animals before slaughtering and the corpses after slaughtering. They are not present during the slaughtering.

The slaughterhouses kill their animals, or the farmers bring the animals to them. However, the latter is not as common, as farmers prefer to slaughter the animals at the butcher's shops. The animals are kept in the pens of the slaughterhouse and are slaughtered individually, depending on demand. Inside the slaughterhouse pens, there is no comfort for the animals, minimal water, and we observed almost no feed, even though the animals are kept there from one to several days.

To facilitate the hoisting of the animals, the flooring of the slaughter platform is intentionally made slippery, causing the animals to fall, which makes it easier to lift them. Additionally, the animals waiting in the pens can see the slaughtering of those that have been processed before them. On one occasion, we observed a bull dying for more than 8 minutes until he bled to death.<sup>53</sup>



Housing facilities within the combined farm and slaughterhouse in Bteghrine, Nadim Saliba (2021)



A Spanish bull in a Ghazieh slaughterhouse with no feed, water, and dirty bedding.

<sup>53</sup> <https://www.youtube.com/watch?v=1xv7l-jyQMo> Live export: beyond borders, beyond imagination, min 08:30–12:10



German animals at a small farm in Lebanon.



**Lack of feed for imported EU animals:**

We interviewed 18 large- and small-scale farmers who keep animals imported from the EU, both for breeding and slaughter. Most of the farmers have difficulty feeding their highly producing EU animals sufficiently. They told us they must partly starve the animals even if they make less milk, as the kg of imported feed is much more expensive than e.g. the milk the animals produce. This was also confirmed by a farm inspector from the Ministry of Agriculture, who told us that the animals do not get enough feed due to the lack of import of the feed because of economic reasons.

The manager of the second largest milk-producing farm, Liban Lait, informed us that they only have Lebanese cows and stopped importing animals from Europe more than 15 years ago, because European animals are not suited to the Lebanese climate.



Left: Animal skin from Ghazieh slaughterhouse was left outside; Right: The drainage from the slaughterhouse.

**Poor management of 'slaughter waste'<sup>54</sup>:**

The slaughterhouses do not have a waste management plan. They dispose of their waste in the dumps, local farmland, or the sea. During the investigation, we visited three major dump sites, discovering the remains of animals decaying on open fields next to the densely populated and farmland area.

After interviewing a representative of the environmental industry, we learned that the biggest polluter is 'slaughter waste' since there are almost no cleaning facilities for it in Lebanon.

**Examples of landfill / dump sites:**

- Saida Municipal dump<sup>55</sup>: the dump is located on the outskirts of the city and the seashore. Untreated slaughterhouse waste is disposed.



Saida Municipal dump is located on the seashore.



Animal remains from slaughterhouses.



FR and MD ear tags, and animal slaughter remains.

<sup>54</sup> Please note: In the EU the managing of animal by-products not intended for human consumption is strictly regulated. The rules are designed to prevent and minimise risk to human and animal health, and to ensure the food and feed chain is kept safe. Animal by-products are graded in three categories depending on the level of health risk they pose to the public or animals. These determine how they should be disposed of or recovered. Slaughterhouse waste is mostly labelled as category 2 material where disposal of waste is by incineration or co-incineration. After treatment also biogas or organic fertilizers can be produced. Disposal of the category 2 material on landfill is allowed only when the slaughterhouse waste is exposed to the process of pressure sterilization, it is permanently marked and disposed to an authorised landfill.

<sup>55</sup>

- Joub Jennine Dump site<sup>56</sup> (in eastern Lebanon): The dump is located on the bank of the Litani River, the longest river in Lebanon, an important water source. It is surrounded by farming fields and close to the city. Administered by the Council for Development and Reconstruction, managing most of the landfills in the country, including the country's largest dumps, Beirut and Tripoli. They received a 20 million euro grant in 2018 for waste management; however, on the dump side, there is evidence of slaughterhouse waste being dumped without prior processing. According to animal ear tags found at the site, the animals originated from Germany and Ukraine.



Ear tag of a German (red circle) and Ukrainian bovine on the dump field.



Slaughtered animal remains.



The Litani River is the longest Lebanese river and a vital water resource. It flows next to waste land (red arrow), a village (blue arrow), and farms and farmland (green arrow).

- Bar Elias Dump<sup>57</sup>: It is an open landfill with no sorting plant shut down in 2022 for lack of funds. There is significant evidence of disposal of animal slaughter remains.



Sheep and goat grazing inside the dump.



Animal slaughter remains.



Dump site located in the midst of farmlands.

56

57

According to our research, Lebanon received funds from the EU to manage the landfill waste dumps<sup>58</sup>, but it failed to do so. The slaughterhouse waste, including bones and unused skin, is dumped untreated in the landfills. The waste dumps are near cities, refugee camps, rivers, seashores, and farmland. A dairy farm is near the waste land, and sheep graze on the dumps. The water from the polluted river is used to irrigate the farmlands.

**If the EU continues the export of live animals to Lebanon, the EU directly contributes to the pollution as Lebanon has no system in place to manage their waste, and particularly their slaughterhouse waste.**

**The export of animals to countries with little or no legislation on animal protection and environmental preservation is cruel to the animals and damaging to the environment and the people living in it.**

## 4. Iraq

**Why animal transports from the EU to Iraq shall not be approved:**

- There is a **lack of control for the non-EU leg of the journey.**
- It is **impossible to reach the destination in Iraq** from Kapıkule, Türkiye, within the **maximum permitted 29 hours.**
- **From the last authorised control post** available at Svilengrad, Bulgaria, the journey time only **to the Iraqi border is at least 35 hours.**
- The **organisers' journey plans are not realistic** and **may not be approved** by the competent authorities.
- **Return of animals into EU not permitted** in case of rejection at Iraqi border, due to conflicting EU animal health laws.
- Iraq is considered a so-called '**animal welfare high-risk country**'.

### Background:

According to Eurostat data, in 2023 the EU exported 4,491 cattle with majority of the animals departing from Bulgaria and some from Hungary. Also, 56 goats were exported from Belgium to Iraq in 2023. Between 2015 and 2023, the EU exported nearly 73,000 cattle and nearly 1,600 ovine animals to Iraq.<sup>59</sup>

### Theory vs. Reality:

#### 1. Exceeded journey times

On the export route from the EU to Iraq (by road), the last EU control post is in Svilengrad, Bulgaria. From there, the distance to the closest border of Habur, Iraq, is 1,935 km according to Google Maps. The driving time is > 27.5 hours, calculated at 70 km/h. Still, it is necessary to include 0.5 hour loading time at the control post in Svilengrad, the time for Bulgarian-Turkish border crossing of minimum 6 hours, and minimum 1 hour rest to water and feed the animals after 14 hours of transport. **This adds up to 35 hours minimum to reach the Iraqi border of Habur - plus the time for crossing this border and a given travel time to the place of destination in Iraq.**

Theoretically, there is the possibility to unload the animals in Kapıkule after the border crossing.<sup>60</sup> However, still in this case, the distance from Kapıkule to the Iraqi border of Habur is 1,915 km according to Google Maps. I.e. **the pure theoretical driving time is still more than 27 hours, calculated with 70 km/h – without taking into account:**

- the 1h rest break for watering and feeding the animals after 14 hours of transport;
- drivers' breaks, time for fuelling, stops at weighbridges en route, unforeseen traffic delays etc.;
- the border crossing in Habur to Iraq and customs procedures;
- the travel time to reach the final destination in Iraq and the time for unloading the animals.

→ **This results in a journey time that is already far exceeded only by calculation.**

→ **In practice, it is impossible to cross Türkiye and reach the Iraqi destination within the maximum permitted journey time of 29 hours.**

#### 2. 24h resting periods for animals not respected

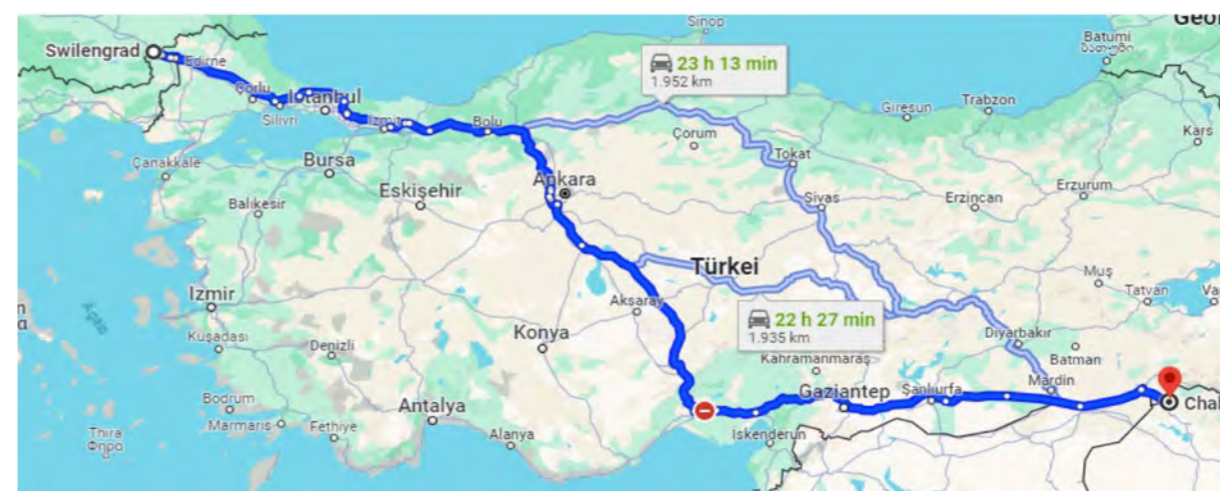
Due to the exceeded journey times when crossing Türkiye to Iraq, the animals must be unloaded and rested for at least 24 hours at a control post in Türkiye.

→ **In fact, there is no EU-approved control post or comparable resting station in Türkiye.**

→ **The animals in transit are apparently not even permitted to be unloaded during their transit in Türkiye.**

#### 3. Driving and resting times for drivers not respected

Due to the distance of >1,915 km and the very long travel time of clearly more than 29 hours from Kapıkule to Habur, it is **not possible to carry out such long transports, including border crossings, with three drivers, let alone with only two or one driver**, considering the provisions of Regulation (EC) No 561/2006.



Distance of journey leg from Kapıkule border through whole Türkiye to the Iraqi border of Habur (Source: Google Maps)

<sup>58</sup> According to the information from interviewing the people responsible for the Dump site.

<sup>59</sup> <https://ec.europa.eu/eurostat> / Please note: Eurostat data for 2024 was not yet available.

<sup>60</sup> Please note: the unloading facility near the border of Kapıkule is not an EU-approved control post/resting station outside the EU.

**Observations in Türkiye, November 2023:**

Teams of Animals' Angels and AWF observed three transports of Hungarian cattle travelling from the Kapıkule border through Türkiye to the Iraqi border at Habur, with destination in Iraq.<sup>61</sup>

**The maximum permitted journey time of 29 hours was clearly exceeded in all three transports: only for the Turkish journey part, i.e. from Kapıkule to Habur border, it took them already between 33 and 36 hours.**

According to the documents, the animals were transported to the area of Dohuk, Iraq. It is unknown how many hours it took the animals to cross the border of Harbur and to reach their destination in Iraq. Also, information is missing on the time needed from Svilengrad to Kapıkule. We assume a minimum of 12.5–13.5 hours additionally, **resulting in 45.5 to 49.5 hours without unloading and resting the animals.**<sup>62</sup>

**Prolonged periods of hunger and thirst:** During the Turkish journey part, the animals were given only a small amount of hay after 20 hours of observation, and on one truck the animals were left without feed for more than 33 hours. Water was not available for all animals due to overcrowding.



Calves transported from Hungary to Iraq. They stand in close contact next to each other and can hardly change position nor lie down and rest all at the same time. Picture taken in Türkiye, November 2023.



Overcrowded conditions, exhausted and tired animals – not all animals have space to lie down and rest. Transport of bull calves from Hungary to Iraq, picture taken in Türkiye, November 2023.

<sup>61</sup> Teams of AWF and Animals' Angels trailed the transports through whole Türkiye, i.e. from Kapıkule border until the Iraqi border at Habur.

<sup>62</sup> The Turkish competent authorities did not reply to our requests up to the present day. → Calculation approx.: 2h loading CP Svilengrad and travel to border Kap. Andreevo/Kapıkule + 6 h border crossing BG-TR + 0.5h resp. 1.5h waiting time in Kapıkule + at least 3h border crossing to Iraq (<https://dlca.logcluster.org/234-iraq-border-crossing-ibrahim-khalil>) + 1h to destination = at least additional 12.5–13.5 hours

Iraq is considered a so-called 'animal welfare high-risk country'.<sup>63</sup>

**EU authorities have no powers outside the EU**, i.e. they cannot effectively intervene once the animals have left EU territory. In Iraq, the animals cannot in fact be protected by EU rules, to which Iraq is not obliged. Iraq has no national animal welfare law or any specific legislation that protects farmed animals during transport, handling and slaughter. It is questionable if the WOA standards are complied with.

**In cases of rejections at the Iraqi border and import refusal of the animals, EU animal health regulations do not allow the re-import of European animals from Iraq.**<sup>64</sup>

Please note:

According to our information, Türkiye does not accept the return of animals in case they are refused entry into Iraq.

- **Animals exported from the EU to Iraq run the risk of being stuck twice at borders - not only at the Turkish border in Kapıkule but also at the Iraqi border in Habur.**
- **There are no contingency procedures that would allow the animals to be returned 1.) from Türkiye to the EU and 2.) from Iraq to Türkiye.**

## 5. Egypt

**Why animal transports from the EU to Egypt shall not be approved:**

- There is a **lack of control for the non-EU leg of the journey.**
- The **ECJ ruling C-424/13 cannot be complied with** on the export route to Egypt.
- There are **no contingency plans and no animal welfare procedures in the event of an import refusal.**
- **Return of animals into EU not permitted** in case of rejection at Egyptian border, due to conflicting EU animal health laws.
- Egypt is considered a so-called '**animal welfare high-risk country**'.
- There is **no animal welfare legislation / no animal welfare guarantees in Egypt**, i.e. when leaving EU territory, the animals are deprived from their protection status to which they are entitled in the EU.

**Background:**

According to Eurostat data, 19,250 cattle were exported from the EU to Egypt. The exporting EU countries were Spain, Croatia and Romania. Between 2015 and 2023, the EU exported nearly 1,000 ovine animals and almost 300,000 cattle to Egypt.<sup>65</sup>

**Theory vs. Reality:**

### **1. Non-compliance of EU rules and lack of control for the non-EU leg of the journey**

The export of animals from the EU to Egypt includes transport by sea on livestock vessels

→ see chapter V (sea transport, p.57)

<sup>63</sup> Maisack, C & Rabitsch, A. Transporte von Rindern und Schafen in Tierschutz-Hochrisikostaaen gehen weiter\* in: Amtstierärztlicher Dienst und Lebensmittelkontrolle, 27–1/2020, p. 37-46

<sup>64</sup> Iraq is not listed in Annex II of Implementing Regulation (EU) 2021/404 in connection with Article 178 of Commission Delegated Regulation (EU) 2020/692.

<sup>65</sup> <https://ec.europa.eu/eurostat> / Please note: Eurostat data for 2024 was not yet available.

At the port of destination in Egypt, the animals are unloaded from the vessel and further transported by local trucks to their final destination.

**These local trucks are multi-purpose cargo trucks and are not designed for the transport of live animals** as they are not equipped with watering devices, do not have any roof protection from sun, and lack proper loading ramps, among others. They are not approved for long journeys and do not fulfil the EU requirements for animal trucks on long distance.



EU cattle loaded from the vessel 'Karim Allah' onto unsuitable cargo truck, after arrival at port of Alexandria, Egypt, 16.-17.10.2016.



Example of cattle transport, observed near Cairo on 20.11.2022.

#### Example: Wrong indication of the final destination and no 48h rest

Between 15.-18.11.2022, Animals' Angels carried out an investigation at the port of Alexandria, Egypt. 26 consignments with 860 German heifers were exported by vessel via the EU port of Koper, Slovenia, to the port of Alexandria which they reached on 15.11.2022, at 08:28 UTC+2 according to Marinetraffic.com. According to the TRACES health certificates, the destination in Egypt was indicated with "Animal Quarantine Alexandria Port". At the port, there are stable facilities where animals can be in theory unloaded, rested and quarantined.

The German heifers should have at least been accommodated at the quarantine stables (i.e. at the place of destination as indicated in the documents) for 48 hours<sup>66</sup>. According to our observations, this did not happen. During the observation period 15.-18.11.2022, the animals were not accommodated in the quarantine stables. It must be concluded that they were directly unloaded from the vessel and further transported on local Egyptian trucks to their real destination which obviously was not the port of Alexandria as indicated in the transport documents but a dairy farm in Egypt.

- During the sea transport and subsequent onward transport of the animals in Egypt from the port to the final destination, compliance with Council Regulation EC 1/2005 cannot be guaranteed.
- The ECJ ruling C-424/13 cannot be enforced on the export route to Egypt.

#### 2. No contingency plans and no animal welfare procedures in the event of import refusal

EU authorities have no powers outside the EU, i.e. they cannot effectively intervene once the animals have left EU territory. When the animals enter Egypt, they can no longer be protected by EU rules, which Egypt is not obliged to follow. Egypt has no animal welfare laws, and the WOH standards are systematically disregarded.

**In cases of rejections at the Egyptian border and import refusal of the animals, EU animal health regulations do not allow the return of European animals from Egypt.**<sup>67</sup>

#### Observations by Animal Welfare Foundation:

AWF documented a transport of animals from the port of Raša, Croatia, to the port of Alexandria, Egypt, which was carried out by the livestock vessel Karim Allah in October 2016.

A total of 1,678 bovines of different categories were loaded as pregnant heifers, bulls for fattening and slaughter, male weaned calves and 67 Italian buffaloes. The animals originated from different EU Member States, such as Austria, Estonia, Germany, Hungary, Italy, the Netherlands, Slovak Republic, Romania, Denmark and Lithuania.

The vessel Karim Allah departed from Raša port on 08.10.2016. **During the sea journey of five days, nine animals died.**

On 13.10.2016, the vessel arrived at the port of Alexandria, Egypt.

- **Delay of unloading at port Alexandria: > 3 days.** The animals had to wait inside the vessel to be unloaded until 16.10.2016. Unloading only on 16.-17.10.2016.
- **Reason: Import refusal:** The Italian buffaloes were not allowed to enter Egypt because they are considered as non-indigenous species. In Egypt, the import of non-indigenous species is prohibited. The buffaloes were not unloaded but had to return on board the vessel to Raša port, Croatia.
- **Re-entry of animals in the EU not allowed:** the buffaloes arrived after another 5-days journey on sea at the port of Raša, Croatia, on 22.10.2016. Due to EU sanitary restrictions, they were not allowed to be unloaded. They had to wait on board the vessel for another two days. During this waiting time of the buffaloes, new consignments of bovines were loaded, destined for Türkiye and Lebanon. On 24.10.2016, the vessel left again the port of Raša, heading first to the Turkish port of Derenche and from there further to the port of Beirut, Lebanon. The Italian buffaloes were on board and finally unloaded in Beirut on 04.11.2016.
- **Unnecessary long transport of buffaloes from Croatia to Egypt, then back to Croatia and from there via Türkiye to Lebanon of nearly one month (08.10.–04.11.2016) due to failure on proper journey planning in the very beginning and the lack of contingency plans and conflicting EU animal health regulations in cases of rejections at non-EU borders.**

<sup>66</sup> Article 2 lit. (s) of Regulation EC 1/2005

<sup>67</sup> Egypt is not listed in Annex II of Implementing Regulation (EU) 2021/404 in connection with Article 178 of Commission Delegated Regulation (EU) 2020/692.

### 3. No animal welfare guarantees in Egypt

**Up to the present day, Egypt has not yet adopted a national animal welfare legislation.**

There is no regulatory framework that lays down specific rules on the protection and welfare of farmed animals during transport, on-farm management, at markets or during slaughter. Accordingly, there are also no official controls in place concerning animal welfare.

As WOA member, Egypt has committed itself to comply with the international WOA animal welfare standards. However, this commitment is not reflected in any field of 'farm' animal activities and production in Egypt.

**Egypt is considered a so-called 'animal welfare high-risk country'**<sup>68</sup>.



The protection of farmed animals in Egypt is rated with the worst category "G" in the World Animal Protection Index.<sup>69</sup>

[www.animals-angels.de/egypt-assembly-centre-2022](http://www.animals-angels.de/egypt-assembly-centre-2022)



Transport of Ukrainian calves, sold at Birqash camel market and further transported for slaughter, 18.09.2022.

In Egypt, the animals face cruel handling and slaughter practices that would be classified under EU law as animal cruelty.

It lacks infrastructure at markets, on transports and slaughterhouses. It lacks know-how on how to handle, load, transport and slaughter animals causing immense suffering to them. Untrained personnel beat and hit the animals with wooden sticks, including in sensitive parts of their body such as face and genitals, and twist their tails. Animals are pulled and pushed onto transport vehicles, without using loading ramps. Unfit animals are loaded for transport. Often sick, injured animals are not receiving proper veterinary treatment but are left to their fate.

When it comes to slaughter, it has been repeatedly reported that leg tendons of the animals are severed for easier control before cutting their throats while being fully conscious.<sup>70</sup>

<sup>68</sup> Maisack, C & Rabitsch, A. Transporte von Rindern und Schafen in Tierschutz-Hochrisikostaaten gehen weiter\* in: Amtstierärztlicher Dienst und Lebensmittelkontrolle, 27-1/2020, p. 37-46

<sup>69</sup> <https://api.worldanimalprotection.org/country/egypt>

<sup>70</sup> Live export: beyond borders, beyond imagination, min 12:09 - 14:56. // Maisack, C & Rabitsch, A. Transporte von Rindern und Schafen in Tierschutz-Hochrisikostaaten gehen weiter\* in: Amtstierärztlicher Dienst und Lebensmittelkontrolle, 27-1/2020

## 6. Libya

Why animal transports from the EU to Libya shall not be approved:

- There is a **lack of control for the non-EU leg of the journey.**
- The **ECJ ruling C-424/13 cannot be complied with** on the export route to Libya.
- **Return of animals into EU not permitted** in case of rejection at Libyan border, due to conflicting EU animal health laws.
- Libya is considered a so-called '**animal welfare high-risk country**'.
- There are **no animal welfare guarantees in Libya**, e.g. when leaving EU territory, the animals are deprived from their protection status to which they are entitled in the EU.
- There is no system in place to ensure the safe disposal of animal by-products not intended for human consumption, posing a significant risk to both, human and animal health.
- Animals are fed with poor quality feed.
- Animals from the EU are not suited to the climatic conditions in Libya.
- Libyans prefer their own sheep to those from the EU due to the price and their traditional practices in raising the animals.

### Background:

According to Eurostat data, the EU exported 40,075 bovines and 238,526 ovines to Libya in 2023. The main exporting EU countries were Spain, Romania and Croatia; additionally, cattle were also exported from Ireland, France and Slovenia, and goats from Cyprus. Between 2015 and 2023, the EU exported around 6.25 million sheep and goats and 600,000 cattle to Libya.<sup>71</sup>

### Theory vs. Reality:

#### 1. Non-compliance of EU rules and lack of control for the non-EU leg of the journey

The export of animals from the EU to Libya includes transport by sea on livestock vessels → see chapter V (sea transport, p.57)

At the port of destination in Libya, the animals are unloaded from the vessel and transported by local trucks to their final destination.

**These local trucks are multi-purpose cargo trucks, not designed for the transport of live animals** as they are not equipped with watering devices, do not have any roof protection from sun, and lack proper loading ramps, among others. They are not approved for long journeys and do not fulfil the EU requirements for animal trucks on long distance.



Examples of local trucks used for animal transports in Libya.

<sup>71</sup> <https://ec.europa.eu/eurostat> / Please note, Eurostat data for 2024 was not yet available.

**EU authorities have no powers outside the EU**, i.e. they cannot effectively intervene once the animals have left EU territory. In Libya, the animals cannot in fact be protected by EU rules, to which Libya is not obliged.

**In cases of rejections at the Libyan border and import refusal of the animals, EU animal health regulations do not allow the return of European animals from Libya.**<sup>72</sup>

## 2. Lack of animal welfare guarantees

**Up to the present day, Libya has not yet adopted an updated national animal welfare legislation**<sup>73</sup>.

There is no regulatory framework that lays down specific rules on the protection and welfare of farmed animals during transport, on-farm management, at markets or during slaughter. Accordingly, there are also no official controls in place concerning animal welfare.

As WOAHA member, Libya has committed itself to comply with the international WOAHA animal welfare standards. However, this commitment is not reflected in Libya.

**Libya is considered a so-called 'animal welfare high-risk country'**<sup>74</sup>.

In a presentation during an international animal welfare meeting in November 2023, a representative of the Libyan Ministry of Agriculture and Livestock stated that *"The authorities in Libya are striving to implement international standards for transport of animals over long distances"*<sup>75</sup>. The primary challenges faced include:

- limited resources and funding
- need to amend local legislation to meet international standards
- enhancing border security to combat animal smuggling
- providing adequate training for personnel involved in animal transportation, and
- promoting better transport vehicles specifically designed for animals.

### Observations by Animal Welfare Foundation, 2022–2023:

From 2022 to 2023, AWF investigated the transport, handling and slaughter of animals as well as the management of slaughter by-products in Libya. During this period, we visited three animal markets where EU sheep are sold, a slaughter site where animals are killed on the street, observed several transports from the port to the quarantine stations, and searched for waste sites where the remains of the slaughtered animals are disposed of.<sup>76</sup>

In Libya, no legislation exists regarding animal welfare, environmental protection, or the management of animal by-products.

### Import practice:

After the vessel's arrival, the animals are unloaded in a place referred to as "Hadera" (an enclosure where animals are kept for veterinary inspection) at the port of Misurata, Libya. A certain number of animals are sold under the rugs and are clandestinely released to the animal

yards located in Tripoli. There, the animals are sold to local farmers at a lower price. Since many animals are smuggled from the port, it is **impossible to observe the European Court of Justice's judgement, Case C-424/13**. The details of the final buyers (local farmers) are not known at the time of departure from the EU ports, meaning that it is impossible to plan the journey to the animals' final destination.

During our visit to the yards, we discovered that the animals do have shade and water, but they are fed extremely poor-quality feed. A veterinarian treating the bovines in one of the stables told us that the animals have jaundice, most likely due to metabolic stress caused by spoiled or mouldy feed.

The animals are treated roughly when loaded onto unsuitable small vehicles not designed for animal transport.



EU cows jammed onto an unsuitable vehicle.



EU bovines in one of the clandestine stables.

<sup>72</sup> Libya is not listed in Annex II of Implementing Regulation (EU) 2021/404 in connection with Article 178 of Commission Delegated Regulation (EU) 2020/692.

<sup>73</sup> Apparently, there is an outdated, old law no. 15 on animal protection dated back to 1989. See: [https://rr-europe.woah.org/app/uploads/2023/11/16\\_wjs\\_2023\\_libya.pdf](https://rr-europe.woah.org/app/uploads/2023/11/16_wjs_2023_libya.pdf)

<sup>74</sup> Maisack, C & Rabitsch, A. Transporte von Rindern und Schafen in Tierschutz-Hochrisikostaaten gehen weiter\* in: Amtstierärztlicher Dienst und Lebensmittelkontrolle, 27–1/2020, p. 37-46

<sup>75</sup> [https://rr-europe.woah.org/app/uploads/2023/11/16\\_wjs\\_2023\\_libya.pdf](https://rr-europe.woah.org/app/uploads/2023/11/16_wjs_2023_libya.pdf)

<sup>76</sup> Detailed information can be requested from AWF

**Slaughtering:**

We couldn't find any operating slaughterhouses, but have visited many times, Al Hay Al Islami, the neighbourhood in Tripoli, where the animals are slaughtered in the street. The spot is characterized by on-the-spot slaughtering. Butchers with their animals are located on this street. The slaughtering of the animals is visible to the public and the animals being slaughtered can see other animals being slaughtered in front of them.

**Poor management of 'slaughter waste':**

According to butchers working on these streets, the slaughter waste is washed right in front of each individual butcher's shop (on the streets). Some of the slaughter waste, such as skins, is collected by local people, who sell it or use it for their purposes.

During our visit to the Ministry of the Environment, we discovered that waste disposal in Libya, including animal by-products, is not regulated. In other words, it is disposed of randomly, with various corners of the city of Tripoli cluttered with random rubbish. This situation arises due to the absence of robust programmes that comprehensively influence waste regulation and disposal, allowing waste to accumulate in inappropriate locations. Only one landfill is acknowledged by the Ministry of the Environment. The landfill is located in the area called Sidi Al Sa'eh and it is managed by a company called "Marcelia"<sup>77</sup>



On the street slaughter butchery.



Hungarian bovine.

**Animal Markets:**

During the Eid al-Adh festival (Festival of Sacrifice), we visited two of the most prominent animal markets in the country, located in Tripoli: the Tuesday Market<sup>78</sup> (Suq Thalath) and the Gorji Street Market<sup>79</sup>. In both locations, Libyan sheep were the predominant animals for sale, although some sheep from Spain, Portugal and Romania were also available. The animals were kept in severely overcrowded enclosures. One reason for the prevalence of Libyan sheep in the markets is their lower price, as well as the tendency of Libyans to trust their local sheep more than those from the European Union.



Portuguese sheep at Tuesday's market.



Romanian sheep at Gorji street market.

<sup>77</sup> Further information can be requested from AWF.

<sup>78</sup> [REDACTED]  
<sup>79</sup> [REDACTED]

## 7. Albania

Why animal transports from the EU to Albania shall not be approved:

- There is a **lack of control for the non-EU leg of the journey**.
- Border crossing Kakavia in Greece is **no designated exit point for live animals**.
- There is a **lack of infrastructure at the border of Kakavia**, i.e. animals to be exported from Greece to Albania are not unloaded in cases of emergencies and transport delays.
- There are **no checks conducted on the animals and on the vehicles at the border**. Checks are sporadically carried out only on the documents and during daytime.
- **Return of animals into the EU not permitted** in case of rejection at the Albanian border, due to conflicting EU animal health laws.

### Background:

According to Eurostat data, 35,228 cattle, 53,921 sheep and goats as well as 120,733 pigs were exported from EU countries to Albania in 2023. The main exporter for cattle and sheep were Romania, Hungary, and Greece. Goats were exported from Greece, Romania and France and pigs mainly from Greece and Hungary. Between 2015 and 2023, the EU exported nearly 1 million pigs, more than 220,000 sheep and goats and nearly 200,000 cattle to Albania.<sup>80</sup>

### Theory vs. Reality:

#### 1. No designated exit point for live animals

The Greek-Albanian border of Kakavia is commonly used for the export of animals from Eastern EU countries to Albania. However, it is illegal to transport live animals across this border crossing.

**The European Commission replied to the PQ E-005354/2021 concerning the border crossing Kakavia: "The Greek authorities have confirmed that Kakavia has not been designated as a point of exit for live animals. Therefore, transporters of animals should not leave the Union territory via that place."**

To this day, this has not been put into practice and is not enforced by the competent authorities.

#### 2. Lack of infrastructure at the Greek-Albanian border of Kakavia

The border crossing in Kakavia, between Greece and Albania, is not equipped with a stable where to unload the animals in cases of emergency.

According to information received, the authorities pretend to use a stable located in Igoumenitsa, at approximately 100 km of distance, that can be reached in about 2 hours by car.

#### 3. No contingency plans and no animal welfare procedures in the event of import refusal

On both sides of the border, facilities are lacking to unload the animals in the event of import refusal. I.e. if animal transports are stuck at the border, the animals have to remain on board the truck. Emergency unloading is not possible, and also a return to the EU is not possible due to conflicting EU animal health laws.

EU authorities have no powers outside the EU, i.e. they cannot effectively intervene once the animals have left EU territory.

In cases of rejections at the Albanian border and import refusal of the animals, **EU animal health regulations do not allow the return of European animals from Albania.**<sup>81</sup>

#### 4. No animal welfare checks at Greek-Albanian border of Kakavia

According to information received by Animals' Angels, there are two official veterinarians working at the Greek border in Kakavia. They work during daytime, between 7:00 and 15:00. They only carry out documental checks but no welfare checks at the animals on board the trucks or at the vehicles.

Animal trucks cross the border to Albania anytime, including at night, between 15:00 pm and 7:00 am, **without any veterinary check before leaving the EU**.

**On the Albanian side**, animal transports undergo health, food safety and customs checks which take averagely 1 hour. **No animal welfare checks are carried out**. The trucks with the animals on board wait for these controls at a parking place without roofs or ventilators, even during high summer temperatures. The Albanian border is not equipped with a stable for emergency unloading.

#### Observations by Animals' Angels at the Greek-Albanian border of Kakavia, 2019–2024:

According to investigations of Animals' Angels carried out between 2019 and 2024, violations of Regulation EC 1/2005 were not detected by the authorities at the Greek border of Kakavia nor emergency measures were taken in case of need.<sup>82</sup>

The teams of Animals' Angels witnessed the following violations:

#### No animal welfare controls:

The road to the border tollgate is uphill and the tollgate is at the top. The veterinary office, instead, is lower down. Animal transports should turn right, a few hundred metres before reaching the tollgate, and take a small road downhill, to undergo the veterinary check. The Animals' Angels team has observed that the animal trucks never went to the veterinary office but always drove directly to the border crossing point, passing through passport and customs control.

In one case in 2024, the official veterinarian drove to the customs toll to check the documents of an international transport of cattle. At the tollgate neither the animals neither the vehicle were submitted to physical checks. Outside temperature was 37.6°C at 11:50. The truck was allowed to cross to Albania and continue the journey.

<sup>81</sup> Albania is not listed in Annex II of Implementing Regulation (EU) 2021/404 in connection with Article 178 of Commission Delegated Regulation (EU) 2020/692.

<sup>82</sup> Animals' Angels addressed the Greek authorities and the European Commission with repeated reports, asking to carry out animal welfare checks at Kakavia and organise an unloading emergency place or not to designate the border of Kakavia as exit point for the export of live animals from the EU to Albania.

<sup>80</sup> <https://ec.europa.eu/eurostat> / Please note: Eurostat data for 2024 was not yet available.

Injured/unfit animals, overcrowding, extreme temperatures, insufficient headroom, lack of vehicle requirements for long journeys (drinkers, fans, dividers), unrealistic planning and inaccurate documents - examples:

→ **Transport of 109 cattle from Bulgaria to Albania via Kakavia, 29-30.08.2019<sup>83</sup>**

- The Albanian truck crossed Kakavia border without any animal welfare check.
- It was a long-distance transport, but the vehicle did not have any drinkers installed.
- Animals of different sizes, including unweaned calves as well as weaned bovines from 200 to 400 kg, were mixed together, without any divider installed in the truck.
- Severe overcrowding: a few animals lied down in recumbent position and trampled by those standing. Three animals were squeezed on top of each other, and the one in the middle, squeezed like in a sandwich, could not move.
- Very high temperatures: 38°C outside.
- The team of Animals' Angels called in vain the Bulgarian and Greek authorities, including the Greek Ministry of Agriculture, asking for an emergency check and action that did not take place.



Detail of an exhausted heifer turned upside down



Detail of an exhausted bull in recumbent position

<sup>83</sup> [Redacted]

→ **Transport of cattle from Romania to Albania via Kakavia, 24.08.2022<sup>84</sup>**

- Truck crossed the border of Kakavia without any animal welfare check.
- The planning indicated a journey of 7 hours, but the distance was 1,600 km; the duration calculated for the journey was unrealistic.
- The journey log indicated 100 sqm space for the animals but according to the documents of the vehicle, the cattle were loaded in 58.5 sqm and were overcrowded.
- This transport travelled during the hottest time of the day, during temperatures between 35°C and 38°C.

→ **Transport of 140 pigs from Greece to Albania via Kakavia, 25.08.2022<sup>85</sup>**

- Truck crossed Kakavia border without any animal welfare checks.
- The pigs were overcrowded due to visible overlapping and body contact and some pigs were walking on top of the others due to the lack of space.
- There were 35°C outside.
- One pig had a prolapse big like an orange and bleeding.



Pig Cora with bleeding prolapse

<sup>84</sup> [Redacted]

<sup>85</sup> Ibid.

→ Transport of pigs from likely Greece to Albania via Kakavia, 31.07.2024<sup>86</sup>

- Truck crossed Kakavia border without any animal welfare checks.
- Pigs were panting with open and foamy mouths, respiratory rates of 200 bpm with 34.6°C inside the compartments. The pigs were in severe heat stress, overcrowded, and vocalizing loud.



Foamy open mouth for heat stress



Extreme temperature

→ Transport of cows from Greece to Albania via Kakavia, 01.08.2024<sup>87</sup>

- Truck crossed the Kakavia border without any animal welfare checks.
- Outside temperatures between 35.7°C and 40.3°C.
- The cows in the 1st deck were overcrowded.
- Ventilation was limited by the insufficient space above the cows in the second deck.
- They were touching the ceiling with their backs.



Cows touching the ceiling on the 2nd deck



Temperature outside at Albanian border

## 8. Moldova

### Why animal transports from the EU to Moldova shall not be approved:

- There is a **lack of control for the non-EU leg of the journey.**
- There are **no contingency plans and no animal welfare procedures in the event of an import refusal.**
- **Return of animals into the EU not permitted** in case of rejection at Moldovan border, due to conflicting EU animal health laws.
- The Moldovan border of Leuseni is **not equipped with facilities for emergency unloading** and the animals wait on board the truck in case of delays.

### Background:

According to Eurostat data, in 2023 the EU exported from Romania and Germany 567 cattle and 1,018 sheep from Spain, Romania and Austria and 62,278 pigs from mainly Hungary and Germany to Moldova. Between 2015 and 2023, nearly 350,000 pigs, more than 2,200 sheep and goats and 6,215 cattle were exported from the EU to Moldova.<sup>88</sup>

### Theory vs. Reality:

#### **No contingency plans and no animal welfare procedures in the event of import refusal**

In case of import refusal from Moldova, the animals remain stuck on board the truck and the Moldovan authorities do not take care of the welfare of the animals.

There was a lack of immediate communication of delays or import refusal from the Moldovan authorities to the Romanian authorities.

**EU authorities have no powers outside the EU, i.e. they cannot effectively intervene once the animals have left EU territory.**

**In cases of rejections at the Moldovan border and import refusal of the animals, EU animal health regulations impede the return of European animals from Moldova.**<sup>89</sup>

### Examples:

**Between 15.08.2024 until mid-September 2024, a transport of pigs from Hungary was detained at the Romanian-Moldovan border in Albitea/Leuseni for about a month.**

According to information received by Animals' Angels, a transport of pigs departing from Hungary was detained at the Moldovan Border Crossing Point of Leuseni on 15.08.2024 for 8-11 hours. The authorities found some documental problems and the transport had to wait with the animals on board.

#### → **The Moldovan authorities did not take any emergency measures.**

Outside temperature was hot, up to 33°C and **about 8-9 pigs died during the waiting time.**

#### → **Return of animals from Moldova into the EU not permitted due to EU animal health laws.**

- Apparently, when the authorities communicated to the driver that he could not enter the country of Moldova, the driver panicked and drove back to the Romanian side of the border, even though the return of pig transports from Moldova is not permitted due to EU animal health laws.

<sup>86</sup> [REDACTED]

<sup>87</sup> Ibid.

<sup>88</sup> <https://ec.europa.eu/eurostat> / Please note: Eurostat data for 2024 was not yet available.

<sup>89</sup> Moldova is not listed in Annex II of Implementing Regulation (EU) 2021/404 in connection with Article 178 of Commission Delegated Regulation (EU) 2020/692.

- The veterinary authorities of the Romanian border Albita emergency unloaded the pigs at the stable of the border. The animals remained at the stable for about a month, while the authorities were discussing a solution.
- The pigs were finally killed on-site as they could not be taken to a slaughterhouse due to EU animal health laws.

**Between 09.–12.12.2017, a transport of 178 pigs for slaughter from Romania was stuck at the Romanian-Moldovan border in Albita/Leuseni<sup>90</sup>.**

The transport left Brasov, Romania, on Friday evening, on 08.12.2017<sup>91</sup>. The animals were destined to a slaughterhouse in Moldova. The next day, the transport left the EU customs territories in Albita and entered the Leuşeni Border Crossing Point in Moldova. Here, the Moldovan authorities refused to import the pigs. The reason was that a new law of Moldova was issued on 06.12.2017, banning pig transports from Romania, as a precaution against African Swine Fever.

- **Moldova did not notify immediately the Romanian authorities.** The pigs remained stuck in the truck in the cold, without water and without food.
- **Romanian authorities could not accept the transport back for sanitary reasons.** After 2 days of detention of the pigs on board the truck<sup>92</sup> and a strong political pressure of the farmers associations<sup>93</sup>, they were unloaded at the emergency pens inside the BCP of Albita, on the Romanian side of the border. They could be finally watered and fed, while the Romanian authorities were discussing a solution in Chisinau, Moldova.



The stable at the Albita BCP (Romania). On the Moldovan side of the border, there are no facilities to emergency unload the animals.

The MEP Mihai Turcanu asked a parliamentary question<sup>94</sup> to the European Commission regarding this case, on 11.12.2017: 1.) if, considering the free trade agreement signed between the EU and Moldova the previous year, the EU Commission was informed of the new ban on importing pigs issued by Moldova and 2.) if the EU Commission could take any step to make the transport of pigs released.

The EU Commission answered on 17.01.2018 to have been informed of the ban by Moldova only on 12.12.2017 and that in the meantime the case of the pigs stuck in Albita was being addressed by the Moldovan authorities.

On 12.12.2017, the pigs were reloaded into the truck and transported to be slaughtered in Romania.

**Please note:** The behaviour of the Romanian veterinary authorities at the exit point of Albita and of Vaslui county was correct and sensible in these two cases mentioned above, as they allowed the animals to be unloaded in the stables with which the BCP in Albita is equipped, giving priority to animal welfare.

- This is commendable, given the numerous examples where it did not happen at other EU exit points, invoking health laws that apparently do not make this possible.
- However, the exceptional nature of this initiative and the length of time the animals had to endure on board the trucks on the Moldavian side, before a solution was reached, are obvious.
- **There remains the dangerous contradiction of the EU health laws with animal welfare during transport across borders, preventing the animals from returning to the EU, who remain hours and days in the trucks waiting for a solution, to end up slaughtered.**

## 9. Russia and Central Asia

Why animal transports from the EU to Russia and Central Asia shall not be approved:

- There is a **lack of control for the non-EU leg of the journey.**
- **Very long journeys and unclear situation about available control posts** outside the EU, risking that the animals remain confined on board the trucks for a prolonged period of time.
- **Extreme temperatures to be expected on this route**, especially in winter causing cold stress to the animals and exposing the animals and drivers to road safety risks due to very harsh conditions and icy roads.
- **Return of animals into the EU not permitted** in case of rejection at non-EU borders, due to conflicting EU animal health laws.
- There are **no animal welfare guarantees in Russia and Central Asia**, i.e., when leaving the EU territory, the animals are deprived of the protection status to which they are entitled in the EU.

### Background:

According to Eurostat, between 2015 and 2023, the EU exported more than 410,000 cattle to Russia, nearly 150,000 cattle to Uzbekistan and almost 60,000 cattle to Kazakhstan. In the same period, more than 26,200 ovine animals were exported to Russia, more than 3,100 to Kazakhstan and nearly 6,000 to Uzbekistan. Additionally, nearly 40,000 pigs were sent by the EU to Russia and more than 1,700 pigs to Kazakhstan from 2015 to 2023.

<sup>90</sup> <https://stiri.md/articole/incidente/un-tir-plin-cu-porci-care-s-a-pornit-spre-moldova-blocat-de-doua-zile-in-vama-albita-motivul/>

<sup>91</sup> <https://protv.md/social/porci-blocati-in-vama-albita-de-doua-zile-din-cauza-unui-act-urmasu--2097171.html> // <https://www.revistafermierului.ro/din-revista/zootehnie/item/2972-178-de-porci-blocati-in-no-man-s-land-vidul-legislativ-tine-blocat-un-camion-cu-suine-in-vama-albita.html>

<sup>92</sup> Information received directly [redacted] of ACEBOP

<sup>93</sup> ACEBOP (Association of Cattle, Sheep, and Pig Breeders and Exporters of Romania) and UECBV (European Livestock and Meat Trades Union)

<sup>94</sup> Parliamentary question - P-007603/2017(ASW)

Despite the Russian invasion of Ukraine in 2022, exports of animals still continued. According to Eurostat, in 2023, more than 3,591 pigs were exported from the EU, namely from France and Ireland, to Russia, as well as 3,589 sheep and goats, mainly from Latvia and Poland, but also from Hungary and Austria. In 2023, also 16,341 cattle were sent from the EU to Russia, with the main exporting EU countries Poland, Hungary and Latvia and some cattle were exported from Germany and Czechia.

Also, exports to Central Asia continued. According to Eurostat, in 2023 e.g. 8,156 cattle were exported to Uzbekistan from mainly Poland, Hungary and Latvia, and 9,204 cattle to Kazakhstan, mainly from Poland, Hungary and Estonia.<sup>95</sup>

**Theory vs. Reality:**

**1. Very long journeys and unclear situation about available control posts outside the EU**

Road transports from Central Europe to e.g. Uzbekistan via Russia last around 9-10 days on average. The animals are exposed to extremely long travel times including multiple 24h rests after 29 hours of journey<sup>96</sup>.

Between 2019 and 2021, Animals' Angels repeatedly documented that these **24h rest breaks at control posts were ignored in Russia and Kazakhstan on the export route to Central Asia, resulting in very long confinement of the animals on board the trucks of up to five days.**<sup>97</sup>



<https://www.youtube.com/watch?v=uDezhTmlgF4>

In 2019, a delegation of German veterinarians travelled to Russia to verify if control posts are available on the export route to Central Asia and, if yes, in which condition they are. **The result of their investigation was clear: it is not possible to export animals by road via Russia to Kazakhstan, Uzbekistan and South-/East Russia in accordance with Regulation EC 1/2005.**<sup>98</sup>

Back then in 2019, there were only two control posts in Russia approved by Russian authorities on the route to South Russia and Central Asia. They were not complying with the provisions laid down in Regulation EC 1/2005.

In 2020, the Russian Federal Service for Veterinary and Phytosanitary Surveillance (FSVPS) sent several letters to the German Federal Ministry of Food and Agriculture (BMEL) concerning the unclear situation of control posts in Russia within a relatively short period of time:

- April 2020: FSVPS stated that no stables in Russia operate as resting points; currently a stable in Samara is under construction but not yet ready for use.
- May 2020: FSVPS stated that currently there is only one authorized holding in Zuzk'y, Smolensk region, to temporarily unload animals on transit in Russia. A few days later, they stated that two more stables in Samara region have been approved.
- August 2020: FSVPS stated that six resting points for animals have been approved in Russia.

→ **It is unclear under which conditions these resting points were approved, and what standards they fulfil respectively, if they comply with the requirements of Regulations EC 1/2005 and 1255/97.**

→ **Up to date, the situation remains vague. There is no public list of EU-certified control posts in Russia.**

→ **Also, for Kazakhstan and Uzbekistan, official information is missing on the authorization and availability of control posts.**

<sup>95</sup> <https://ec.europa.eu/eurostat> / Please note: Eurostat data for 2024 was not yet available.

<sup>96</sup> After 29 hours the animals must be rested in an approved control post for at least 24 hours according to Annex I chapter V 1.4. letter d and chapter V 1.5. of Regulation EC 1/2005

<sup>97</sup> [Redacted]

<sup>98</sup> [https://tierschutz.hessen.de/sites/tierschutz.hessen.de/files/2022-11/bericht\\_russland.pdf](https://tierschutz.hessen.de/sites/tierschutz.hessen.de/files/2022-11/bericht_russland.pdf)

*"Information from different sources shows that resting places in certain third countries did not comply with both Regulation (EC) 1/2005 and the Zuchtvieh-ruling. Resting places were sub-standard, and even sometimes all but non-existent and/or they were often not used for a 24-hours stop, even though the journey plan indicated that a stop would be made there. So far, there is no system in place to verify if non-EU resting places exist and comply with the rules, and there is no official EU-list of resting places outside the EU."*<sup>99</sup>

*(Written statement of the Dutch then-Minister of Agriculture, Nature and Food Quality Carola Schouten to the 3rd hearing of the ANIT Committee, 2021)*

**2. Extreme temperatures**

In 2019, AWF analysed the data of 618 consignments with bovines departing from the EU countries to Russia and Central Asia between December 2018 and March 2019, which were received under the Freedom of Information Act.

ROW LABELS	COUNT OF TEMP. BELOW -10C (TEMP. MIN, DATE FROM COLUMN A)
Austria	23
Czechia	21
Denmark	70
France	3
Germany	144
Hungary	4
Netherlands	41
Poland	2
<b>Grand Total</b>	<b>308</b>

*On the left side, the origin of the animals, and on the right side, the number of consignments transported to Russia and Central Asia with outside temperatures below -10°C, between December 2018 and March 2019.*

**Animals in 308 consignments were transported in outdoor temperatures ranging from -10°C to -20°C.** Regulation EC 1/2005 states in Annex I Chapter VI point 3.1 that the temperature in the animal compartments must be kept within 5 to 30 °C, with a derogation of +/- 5°C, irrespective of whether the vehicle is moving or standing still.

Even though animals can heat up the environment because of the heat emanated from their bodies, it is likely that in extremely cold environments, on wet bedding due to very long journeys and scarce nutrition and watering, the animals will suffer from cold stress.

Please note: According to the temperature records of two transports of pregnant heifers from the Netherlands to Uzbekistan that Animals' Angels observed in February 2020, **the temperatures inside the vehicles fell several times, including over very long period (>48h) below the legal requirements, both in Russia and Kazakhstan. Partly, there were only minus 14°C recorded while the animals were on board.**<sup>100</sup>

*As stated by EFSA in their scientific opinion on Welfare of cattle during transport "Cold weather conditions, which can be exacerbated by windchill in a moving vehicle, animals rapidly mobilise body energy reserves to try to maintain body temperature (cumulative effect of feed deprivation and too low effective temperature), in which case feed intake needs will be higher (Fisher et al., 2009)."*<sup>101</sup>

<sup>99</sup> [https://www.europarl.europa.eu/meetdocs/2014\\_2019/plmrep/COMMITTEES/ANIT/DV/2021/02-25/Questions-Answers\\_DutchMinistryofAgriculture\\_NEWVERSION\\_EN.pdf](https://www.europarl.europa.eu/meetdocs/2014_2019/plmrep/COMMITTEES/ANIT/DV/2021/02-25/Questions-Answers_DutchMinistryofAgriculture_NEWVERSION_EN.pdf)

<sup>100</sup> [Redacted]

<sup>101</sup> EFSA Journal 2022;20(9):7442, p. 68

Considering that accurate data on the condition and equipment of animal resting stables in Russia are lacking, we cannot be sure if animals are getting adequate feed, water, and rest in those stables.



Examples of road conditions in Russia – icy, dangerous roads, snowstorms etc. Transports of German heifers to Uzbekistan, February 2019.



Animals with wet coats and covered with snow inside the transport vehicle. Outside temperatures -7.2°C and snowstorm. Transport of German heifers to Uzbekistan, February 2019.

### 3. No return of animals to EU in cases of import refusal

On the export route by road to Russia and Central Asia there are several non-EU borders to cross, including e.g. the Polish-Belarusian, Belarusian-Russian, Russian-Kazakh as well as Kazakh-Uzbek borders. It is highly questionable what happens to the animals in cases of rejections at these borders. A return in the EU is not possible for the animals from none of these transit and destination countries due to conflicting EU animal health laws.

**EU authorities have no powers outside the EU**, i.e. they cannot effectively intervene once the animals have left EU territory. In Russia, Kazakhstan, Uzbekistan and other Central Asian countries, the animals cannot in fact be protected by EU rules, to which these countries are not obliged.

At the latest since the Russian war of aggression against Ukraine in 2022 and the associated political tensions between Russia and the EU, it is even more questionable whether effective communication between the veterinary authorities of the EU Member States and Russia would still be possible at all, e.g. in cases of emergencies and import refusals in order to solve possible problems and ensure the wellbeing of the animals.

**In cases of rejections of the animals at the non-EU borders, EU animal health regulations do not allow the return of European animals from Russia and Central Asian countries such as Uzbekistan and Kazakhstan.**<sup>102</sup>

### 4. Lack of animal welfare standards in importing countries

Russia and Central Asian countries such as Kazakhstan and Uzbekistan are members of WOAHP and thus have committed themselves to comply with the international animal welfare standards. However, it remains unclear to what extent these standards are indeed implemented in practice.

Proper animal welfare laws, including farmed animals and the protection of animals during transport in particular are lacking or insufficient in the above-mentioned countries.

Example Russia:

**The protection of farmed animals in Russia is rated with the worst category “G” in the World Animal Protection Index.**<sup>103</sup>

In 2018, Russia has adopted an animal welfare act (Federal Law No. 498-ФЗ ‘On Responsible Handling of Animals and on Amending Certain Legislative Acts of the Russian Federation’) for the first time. However, farmed animals, among others, are **excluded** from these provisions.<sup>104</sup>

Concerning animal transports, there is only a Ministerial Decree from 2017 on the ‘veterinary rules for the transportation of pigs and feed for them by road’ according to the World Animal Protection Index, but not for the other species transported. Concerning the protection of animals during slaughter, no legislation could be found.<sup>105</sup>

## 10. Ukraine

**Why animal transports from the EU to Ukraine shall not be approved:**

- There is a **lack of control for the non-EU leg of the journey.**
- There are **no contingency plans and no animal welfare procedures in the event of transport delays and import refusal.**
- **Return of animals into the EU not permitted** in case of rejection at Ukrainian border, due to conflicting EU animal health laws.
- Ukraine has been a **war-torn country** for three years, at least. It is therefore **dangerous to send live animals and drivers.**

<sup>102</sup> Russia and Central Asian countries are not listed in Annex II of Implementing Regulation (EU) 2021/404 in connection with Article 178 of Commission Delegated Regulation (EU) 2020/692.

<sup>103</sup> <https://api.worldanimalprotection.org/country/russia> // N.B. no information available for Kazakhstan and Uzbekistan.

<sup>104</sup> <https://www.fao.org/faolex/results/details/fr/c/LEX-FAOC183356/> //

<sup>105</sup> <https://api.worldanimalprotection.org/country/russia>

**Background:**

According to Eurostat data, the EU exported 1,587 cattle, 30 sheep and 7,287 pigs to Ukraine in 2023. Main exporter for cattle were Denmark, Slovakia and Hungary, but also Poland and Lithuania. The sheep were exported from Czechia and the pigs mainly from Denmark, but also France and Ireland. Between 2015 and 2023, the EU exported more than 110,000 pigs, nearly 22,500 cattle and around 10,000 sheep and goats to the Ukraine.<sup>106</sup>

**Theory vs. Reality:****No contingency plans and no animal welfare procedures in the event of transport delays and import refusal**

EU authorities have no powers outside the EU, i.e. they cannot effectively intervene once the animals have left EU territory. When the animals enter Ukraine, they can no longer be protected by EU rules, which Ukraine is not obliged to follow.

**In case of rejections at the Ukrainian border and import refusal of the animals, EU animal health laws do not allow the return of European animals from Ukraine.**<sup>107</sup>

**Example:**

**Between 07.–13.06.2018, a transport of 259 goats and sheep<sup>108</sup>, for breeding purposes, was detained at the Hungarian-Ukrainian border in Tysa-Chop – in total, for one week.**

The animals were loaded in Ried and St. Pölten, Austria, and destined to Lvivska Oblast in Ukraine. The Ukraine authorities refused the importation because the documents accompanying the animals were incompliant with the import requirements. **The animals remained on board the truck for one week.** The organiser arranged food and water.

**→ Delays and import refusal not immediately communicated to the exporting country.**

- The Ukrainian authorities informed only the buyer of the import refusal.
- The Austrian organiser did not inform the Austrian veterinary authorities of the problem.
- The Austrian veterinary authorities were informed only by Animals' Angels on 11.06.2018.

**→ Checks can cause severe delays at the Hungarian and Ukrainian borders and customs<sup>109</sup>.**

- On 13.06.2018 at around 18:30, the Austrian goats and sheep were accepted to be imported, and the truck was released. Despite the farm of destination was about 300 km away, the truck had to reach the customs office first. Arriving at night, the office was found closed. The next day, 14.06.2018, at 14:00, the truck was still waiting for customs clearance.

In 2019, Animals' Angels was informed about two further cases where the trucks were stuck for up to 10 hours at the Ukrainian border of Chop Oblaska. Again, no emergency measures were taken to ensure the wellbeing of the animals during these transport delays at the border, but the animals had to remain on board the vehicles.

<sup>106</sup> <https://ec.europa.eu/eurostat> / Please note: Eurostat data for 2024 was not yet available.

<sup>107</sup> Ukraine is not listed in Annex II of Implementing Regulation (EU) 2021/404 in connection with Article 178 of Commission Delegated Regulation (EU) 2020/692.

<sup>108</sup> INTRA [redacted] and INTRA [redacted]

<sup>109</sup> Despite the agreement EU-Ukraine Deep and Comprehensive Free Trade Area <https://trade.ec.europa.eu/access-to-markets/en/content/eu-ukraine-deep-and-comprehensive-free-trade-area>

## V. Sea transport

**Why animal exports by sea / livestock vessels shall not be approved:**

- There is a **lack of control for the non-EU leg of the journey.**
- There are **no contingency plans or animal welfare procedures in the event of an import refusal.**
- **Return of animals into the EU not permitted** in case of rejections at non-EU borders, due to conflicting EU animal health laws.
- There are **no animal welfare guarantees in the importing countries**, i.e. when leaving EU territory, the animals are deprived of their protection status to which they are entitled in the EU.
- **Most dangerous vessels (flying black or grey flag)** are used to transport animals.
- **Breach of MARPOL Regulation Annex V**, because of pollution of the Mediterranean Sea with dead animals and cargo residues.

**1. The most dangerous vessels in the world's fleet are used to transport animals<sup>110</sup>**

Currently, 64<sup>111</sup> livestock carriers can load European animals on EU ports and export them to third countries. At least 1.5 billion € worth of trade is carried out on substandard ships.<sup>112</sup> Nearly half of the EU-approved livestock carriers fly the flag of a country listed by the Paris Memorandum of Understanding (Paris MoU) as a black flag (for example, Togo, Sierra Leone, or Tanzania). The average EU-approved livestock carrier is now older (43 years old), smaller (97 m in length), converted from general cargo ship at the age of 30, detained 5 times throughout her operational life, still classed by a non IACS classification society (67%) and flying a black-listed flag (48%).

EU-approved livestock carriers transport between 1,000 and 3,800 cattle or up to 14,000 sheep (cf. Queen Hind and Bahijah). Port State Controls over the last three years confirm deficiencies regarding safety of navigation, certificates and documentation, lifesaving appliances, Maritime Labour Convention 2006, fire safety, and pollution prevention (MARPOL) which are prevalent and affect at least 75% of the EU-approved fleet. Other major deficiencies such as emergency systems, working and living conditions, propulsion and auxiliary machinery, radio communications, structural conditions, water/weathertight conditions, ISM have been reported for more than half of the EU-approved fleet.

EU livestock vessels were detained between 1 and 29 days in 2021-2023, none were banned from European ports. Of 64 EU-approved livestock carriers, only 4 were built purposely as livestock carriers. All the other EU-approved livestock carriers (60 ships, 94%) have been converted from general cargo ships (34), Ro-Ro (10), car carriers (9), reefers (4) and container ships (3). They were converted for further trading at an age they should have been scrapped: the average age at the time of conversion was 30 years compared to the average age of ships scrapped worldwide in 2021, 30 years. As a result of their conversion, livestock carriers also suffer from an increased stability risk. However, the conversion of livestock vessels is not being questioned regarding maritime safety or animal welfare.

<sup>110</sup> <https://www.youtube.com/watch?v=gj1xhnYXEI4>

<sup>111</sup> According to 2024 data.

<sup>112</sup> [www.animal-welfare-foundation.org/files/downloads/Report\\_64-livestock\\_AWF\\_RobindesBois\\_FINAL\\_March24-BD.pdf](http://www.animal-welfare-foundation.org/files/downloads/Report_64-livestock_AWF_RobindesBois_FINAL_March24-BD.pdf)

The 2024 average EU-approved livestock carrier is more than ever a substandard ship. Vessel approval standards in the European Union need to be upgraded, and dangerous vessels should be eliminated. **Only the white flagged ships should be authorised for animal transport.**



[www.youtube.com/watch?v=gi1xhnYXEI4](https://www.youtube.com/watch?v=gi1xhnYXEI4)

The EU exports a large number of farmed animals by sea, mainly to the Middle East and North Africa. The demand for live animals in third countries has been growing in recent years, including breeding animals, animals for fattening and for immediate slaughter. According to DG SANTE, 2,868,570 sheep and cattle were exported by sea from Croatia, France, Ireland, Portugal, Romania, Slovenia and Spain in 2018. A total of 658 vessels departed from EU ports in 2018.<sup>113</sup>

Romania and Spain are the main exit points of EU animals exported to third countries by sea. The main importing countries in 2018 were Lebanon, Jordan, Israel, and Libya. Later, trade with Saudi Arabia and Türkiye started. The trade and routes change every year, in 2023 according to Eurostat, e.g.:

- Spain mainly exported to Morocco, Lebanon, Libya, Egypt, Jordan, Saudi Arabia
- France mainly exported to Algeria
- Romania exported mainly to Israel, Jordan, Türkiye, Libya, Saudi Arabia
- Croatia: Israel, Lebanon
- Portugal: Israel
- Ireland: Libya

## 2. Marine pollution by livestock vessels

Live animals from the European Union and non-EU countries are transported across the Mediterranean Sea to Israel, Türkiye, Egypt, Lebanon, Libya, Algeria, and Morocco, causing an alarming environmental impact and repeated violations of MARPOL<sup>114</sup> by:

- **Disposal of dead animals from livestock vessels:**

Disposal of dead animals from livestock vessels is a violation of MARPOL Regulation. It prohibits the disposal of dead animals in special sea areas, such as the Mediterranean-, Black- and Red Sea. Dead animals (animal carcasses) are considered “garbage” under MARPOL 73/78 Regulation, Annex V and need to be disposed of in port reception facilities, but dead animals are regularly dumped in the Mediterranean Sea.

Dead animals are found during almost every journey. As stated in a study for the European Parliament's ANIT Committee<sup>115</sup> on animal transport, very few ports for livestock vessels have carcass reception facilities, such as some ports in Spain, Egypt, or Israel. Not all of them accept animal carcasses for health reasons.



[www.youtube.com/watch?v=HPGcZzwSbCO](https://www.youtube.com/watch?v=HPGcZzwSbCO)

<sup>113</sup> DG(SANTE)2019-6835

<sup>114</sup> [https://www.imo.org/en/about/Conventions/Pages/International-Convention-for-the-Prevention-of-Pollution-from-Ships-\(MARPOL\).aspx](https://www.imo.org/en/about/Conventions/Pages/International-Convention-for-the-Prevention-of-Pollution-from-Ships-(MARPOL).aspx)

<sup>115</sup> [https://www.europarl.europa.eu/meetdocs/2014\\_2019/plmrep/COMMITTEES/ANIT/DV/2021/05-25/Report\\_Boada\\_Animal-welfareonseavessels\\_EN.pdf](https://www.europarl.europa.eu/meetdocs/2014_2019/plmrep/COMMITTEES/ANIT/DV/2021/05-25/Report_Boada_Animal-welfareonseavessels_EN.pdf)

- **Discharge of effluent / manure from livestock vessels**

On journeys from the European Union to third countries, the use of bedding material is required by Regulation EC 1/2005. The livestock vessels are cleaned and washed after the animals have been unloaded during the return journey to European ports. The effluent is then disposed of into the sea without any prior storage or treatment.

According to MARPOL Annex IV, Regulation 1. 3. sewage is “*drainage from spaces containing living animals*”. MARPOL Annex IV does not extend to solid parts such as pellets and bedding according to Resolution MEPC.219(63) (“2012 Guidelines for the implementation of MARPOL annex V”). In its chapter 5.2, this guideline – though, in the context of port reception facilities – makes an express distinction between “*drainage from spaces containing living animals*” and “*animal waste, including used bedding from the transport of live animals*”.

For journeys from the European Union to third countries, the use of bedding material is required by Regulation (EC) No 1/2005. The cargo residues, a mixture of bedding, dung and manure from the animal compartments, are washed into the sea on the return journey to European ports without prior storage or treatment, in contravention of MARPOL V.

According to Environmental department of the German Federal Maritime and Hydrographic Agency and the German port state control organization, the liquid residue should be separated from the solid and retained in tanks. In a joint statement<sup>116</sup> they state: “*In our opinion, the liquid residue from animals in the (loading) areas aboard ships falls under MARPOL Annex IV, since it is explicitly defined in Rule 1, Paragraph 3.3 of MARPOL Annex IV. Therefore, at least the liquid residues fall under the discharge requirements of Annex IV, which are regulated in Rule 11 of Annex IV. Discharging without adhering to the relevant discharge criteria is strictly prohibited and would result in a fine of up to £50,000 for vessels within German jurisdiction, in cases of intentional breach and high wastewater volume. Additionally, with respect to the fact that the residues are mixed with bedding material, etc., the residues are subject to Regulation 1, Clause 1. Residues of cargo are classified as “cargo residues” under Annex V of the MARPOL Convention and are subject to special discharge requirements (Regulation 4.1.3 or Regulation 6.2)*”.

- **Discharge of wash waters contaminated with disinfectants**

The European Union mandates adequate cleansing and disinfection of livestock vessels to mitigate disease transmission risks. The certificates issued by the vessel operator must clearly state the date, time, and location of the disinfection process, along with the name of the disinfectant used. AWF's document review has uncovered evidence that disinfectants harmful to marine life are being used. The disinfectants, including Virkon S, Sodium hypochlorite, and Hypred Force 7, pose a severe threat to aquatic life with long-lasting effects. With regard to disinfectants, the BSH states: “*Cleaning agents and additives used for cleaning cargo holds, including those present in wash water, are also defined under Regulation 1, Paragraph 12 and must not be harmful to the marine environment.*”<sup>117</sup>

## 3. Most recent cases of contingency situations

In Annex II of the study ‘Animal Welfare on Sea Vessels and Criteria for Approval of Livestock Authorisation’<sup>118</sup>, 16 case studies on contingency situations involving the transport of live animals by sea are described. Here, we focus solely on the most recent ones.

<sup>116</sup> Written Statement of German Federal Maritime and Hydrographic Agency and German Port State Control from November 14th, 2023, on request on the categorization of cargo residues from vessels transporting live animals.

<sup>117</sup> Ibid.

<sup>118</sup> [https://www.europarl.europa.eu/meetdocs/2014\\_2019/plmrep/COMMITTEES/ANIT/DV/2021/05-25/Report\\_Boada\\_Animal-welfareonseavessels\\_EN.pdf](https://www.europarl.europa.eu/meetdocs/2014_2019/plmrep/COMMITTEES/ANIT/DV/2021/05-25/Report_Boada_Animal-welfareonseavessels_EN.pdf)

**Express M (IMO: 8200577):**

The livestock vessel Express M departed Romania for Haifa, Israel, on 22 February 2025, with an estimated 2,300 young calves and 450 lambs. However, it soon stopped and remained anchored for days before resuming its journey at an unusually slow speed. On February 27, it unexpectedly turned back north before changing course again toward the Bosphorus. After passing through, it anchored again on February 28 and did not move until March 3.

Due to delays, the animals were at sea for more than two weeks instead of the usual 5–6 days, raising concerns about food shortages. Romanian authorities confirmed an engine failure, but the captain continued after a supposed fix. While some feed was reportedly loaded in Istanbul, it was likely insufficient. Conditions on board deteriorated due to extended travel time, lack of sawdust for bedding, and soiled pens. The vessel anchored once more on March 4 before finally reaching their destination in Israel on Sunday evening, March 9 at 5.20 pm local time - after 15 days, 2 hours and 25 minutes in a desolate condition. Because of the transport with a dangerous ship, Express M, which was built in 1983. It has repeatedly attracted negative attention in the past. It was detained in Falmouth (United Kingdom) in 2009, in Tarragona (Spain) in 2018, in Sines (Portugal) and Waterford (Ireland) in 2020 and again in Sines in December 2024. The reasons are manifold. Among other things, the competent inspection authorities repeatedly criticized ship safety, construction, navigation, international security and the prevention of marine pollution. Its most recent detention in December 2024 cited 25 safety, security, and pollution deficiencies. It sails under Panama's "grey flag," indicating a higher risk level.

This incident underscores the dangers of live animal transport by sea, calling for immediate action, including revoking the vessel's approval and stronger EU regulations.



Express M (Copyright: Animals International)



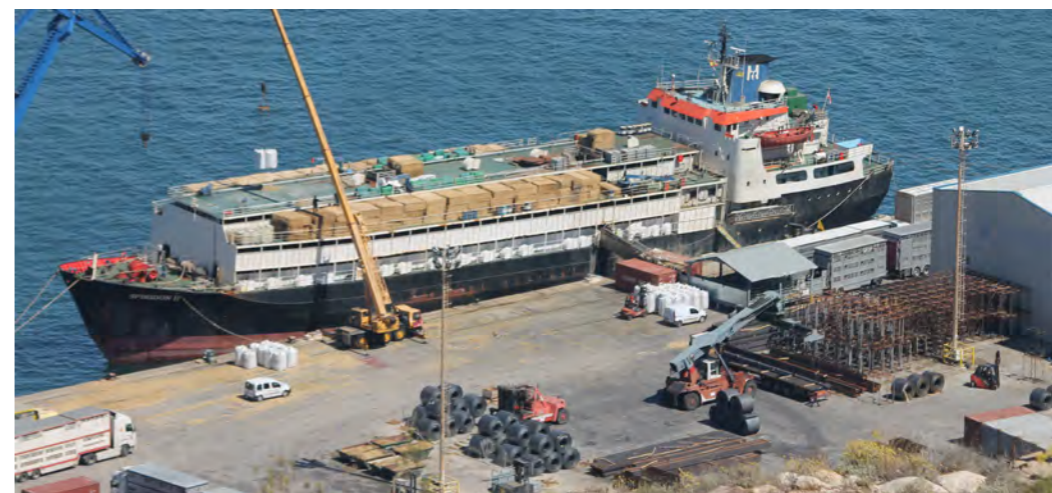
<https://youtu.be/B5JrkhUW0Nw>

**Spiridon II (IMO: 7311329):**

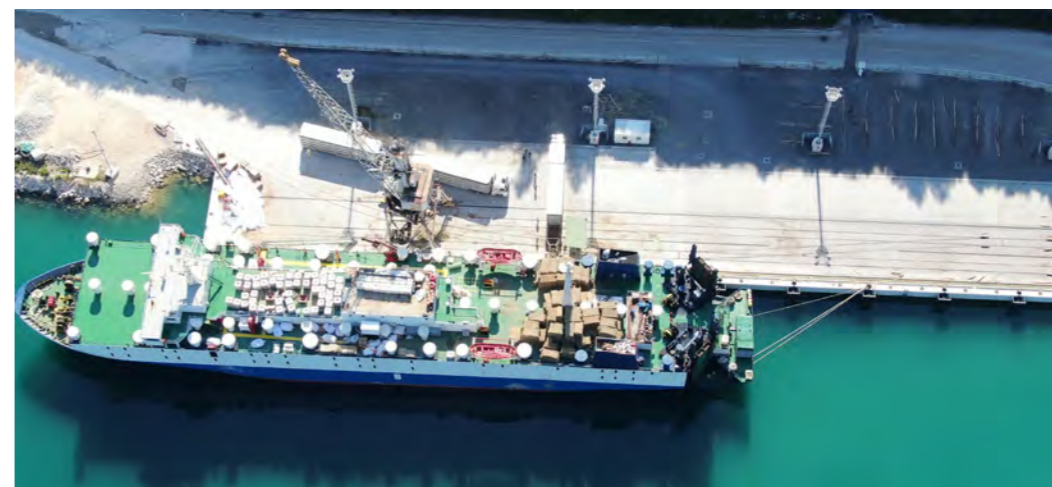
On 23 February 2022, the livestock carrier Spiridon II departed from Tarragona in Spain, one of the leading exporters of live animals in Europe. Onboard were approximately 300 young bulls from France and Spain and 7,600 Spanish sheep heading to the Port of Aqaba in Jordan.

On 27 February 2022, the vessel encountered engine problems, interrupting the journey and leaving it moored near Greek ports for three days. Unloading the animals onto European soil was not an option; once at sea, they are classified as "export" animals and cannot re-enter the EU.

Finally, on 4 March 2022, Spiridon II was brought to Eleusis, near Athens, Greece, where the 8,000 animals were transferred directly from one vessel to another, specifically to the livestock carrier Adel I (IMO: 8017970), via a ramp over the water. This manoeuvre at sea was necessitated by the port of Eleusis not being authorised to transport animals to third countries. During long journeys like this, no veterinarian is onboard, regardless of the number of animals, which was also true for Spiridon II. It remains uncertain whether the animals were fit to continue their voyage to Jordan after spending 10 days on the vessel, and it is also unclear if any unfit animals were emergency euthanised on site.



Spiridon II in Cartagena port, Spain. The former cargo ship Spiridon II, with Togolese flag, was converted into a livestock carrier in 2011 and is now 51 years old. It is ranked high risk by Port State Control Paris MoU and listed on its blacklist.

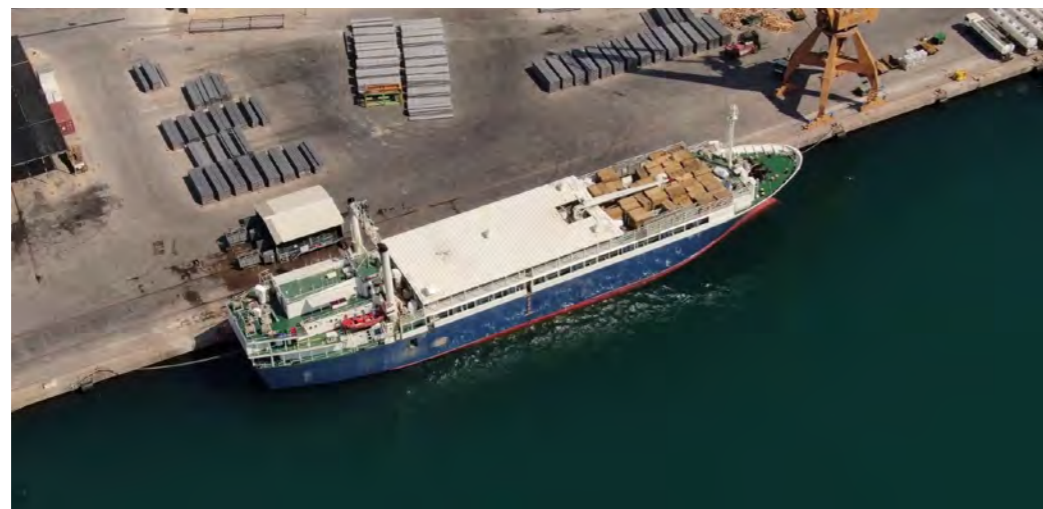


The former car carrier ship Adel I, now named Alkhudair Star, with a Jamaican flag, was converted into a live-stock carrier in 2017 and is now 41 years old— three detentions since 2010. Croatian authorities last approved it until March 4, 2023.

**Vessel Nader A (IMO: 7611547):**

In September 2022, the livestock carrier Nader-A was blocked at Algiers' port, Algeria, upon its arrival on September 4. The vessel, transporting 789 bulls weighing 700 kg each, remained at sea for at least 18 days before returning to the Port of Sète, France. Reports indicate that at least 30 animals died before reaching France.

Algerian authorities refused to authorise the unloading of the animals due to health concerns, citing missing documents confirming the bulls were free from infectious bovine rhinotracheitis (IBR). This oversight suggests that French authorities should have never approved the transport in Sète.



*Nader-A, a 48-year-old vessel flying a Togolese flag, is registered under a blacklisted country according to the Paris MoU. As of the 2024/2025 performance list, Togo ranks 64th out of 71. During its last inspection in Tarragona, Spain (25 November 2024), authorities found 27 deficiencies and detained the vessel. Despite this, Nader-A is currently transporting animals from Cartagena, Spain, to Misurata, Libya.*

**Karim Allah (IMO: 6519144) and Elbeik (IMO: 6718427):**

On 18th December 2020, the livestock vessels Karim Allah and Elbeik departed from the ports of Cartagena and Tarragona (Spain), bound for Iskenderun (Türkiye). Originally expected to be a 10-day journey from a European to a non-EU country, the 2,600 bovines on board underwent a three-month odyssey with a fatal outcome. When the Karim Allah and the Elbeik arrived in Türkiye (nine and ten days after departure, respectively), the animals on both vessels were rejected by the competent authorities of the importing country due to a disagreement with the Spanish competent authorities regarding certain discrepancies in the veterinary export certificates issued by the latter. The same issue occurred when the two vessels reached Libya (on 6 and 9 January 2021, respectively). From then on, the two livestock vessels navigated the Mediterranean Sea without a destination, searching for buyers in other non-EU countries. The Karim Allah returned to Cartagena on 22 February 2021, while the Elbeik's return was further delayed until 18 March 2021.

Once back in Cartagena, Spanish official inspectors (from the Animal Health Inspection Service of the Agriculture and Fishing Area of the Region of Murcia) boarded the vessels and found the animals in poor condition. In accordance with the inspectors' recommendations, the Spanish Ministry of Agriculture, Fisheries and Food (MAPA) issued orders to euthanise the animals that were still alive for health and welfare reasons. The euthanasia operations began on 6 (Karim Allah) and 25 (Elbeik) March 2021.

After a big dept for the owner of Elbeik due to this case, in 2021 the vessel suffered a suspicious big fire incident, and then was abandoned next to the port of Tarragona (Spain) by the crew. Only after 4 years, and several failed auctions, this vessel has been sold for 88.000 euros to **Rota Shipping**, a company specialized in scrap, buying and selling vessels.

More details can be found in the Accountability Report on the Karim Allah and Elbeik Crises.<sup>119</sup>



*Elbeik in Cartagena. Spain.*



<https://www.youtube.com/watch?v=9ZUCqyh2N3k>

<sup>119</sup> [https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-05/2021\\_06\\_01\\_joa\\_accountability\\_report.pdf](https://www.eurogroupforanimals.org/files/eurogroupforanimals/2021-05/2021_06_01_joa_accountability_report.pdf)



Karim Allah in Tarragona port, Spain.



[https://www.youtube.com/watch?v=gq\\_5-e3s\\_1A](https://www.youtube.com/watch?v=gq_5-e3s_1A)

### ANIT Vote (Committee of Inquiry on the Protection of Animals during Transport)

On 20 January 2022, the European Parliament voted on the ANIT Committee's motion for a resolution B9-0057/2022. In its recommendations, the ANIT Committee:

- calls for measures enabling a shift to a meat, carcasses and genetic material trade to replace sea transport of live animals;
- urges the EU Commission to improve and clarify the provisions on maritime transport; in particular on the authorisation process, the definition and identification of organisers and transporters and of their obligations, in order to establish a clear chain of responsibility and transparent communication between farmers, transporters and veterinarians with the competent authorities;
- calls for the introduction of dissuasive measures to prevent dead animals from being discarded in the sea or on transport routes in accordance with the International Convention for the Prevention of Pollution from Ships (the Marpol Convention);
- considers the mandatory presence of an independent veterinarian as essential, proportionate to the number of animals, during rest periods at official lairage facilities, and loading and unloading, in particular for long-distance transport;
- calls on the Member States to introduce mandatory provisions for sea journeys, ensuring the presence of veterinarians or, as last resort, a certified professional with appropriate skills, on board for the whole duration of the sea journey, in order to verify the implementation of the relevant animal health and welfare standards and provide real-time support for sick or injured animals on vessels, as well as to adjust the watering and feeding of the animals to their immediate needs.

## VI. CONCLUSION

The EU and its Member States keep sending animals to third countries that have not even implemented the international WOH standards nor any national legislation on the protection of animals during transport or slaughter. Those countries like Türkiye and Lebanon that have enacted own animal welfare legislation have proven to fail its enforcement.

**Article 13 TFEU is completely ignored.** Exporting animals to third countries without animal welfare guarantees deprives them of their protection status they are granted in the EU. Animals' Angels, Animal Welfare Foundation and other NGOs as well as journalists have repeatedly documented severe and systematic 'farm' animal abuse and cruelty during transport, handling at markets and at slaughter in different importing countries of North Africa and the Middle East region. Practices are commonly observed that would be classified as cruelty to animals under EU law. Clearly, economic interests prevail over ethical or legal considerations and societal expectations.



<https://www.youtube.com/watch?v=1xv7l-jyQM0>

The European Court of Justice ruled in C-424/13 that the protection of animals under EU law does not stop at the borders of the EU. If this basic requirement cannot be ensured in a particular country, the export of live animals shall not continue to be authorized to such a country. However, **practice has shown over and over again that the ECJ-ruling from 2015 is systematically ignored by the competent authorities in the EU.** As soon as the animals leave the EU, they are in fact not protected by EU laws any longer as the third countries (including destination and transit countries) are not obliged to follow these EU rules. EU authorities have no power to intervene outside the EU.

**The precautionary principle of Article 3 of Council Regulation EC 1/2005 is systematically ignored by the competent authorities in the EU.** Competent authorities in the EU Member States continue to approve export transports of animals despite the realistic high risk that the animals are transported in a way that causes injury or undue suffering to them. The recent cases at the Turkish or Moroccan borders just have demonstrated in an appalling way how this could end for the animals.

**Up to date, there are no contingency plans in place in the event of transport delays and import refusals at the non-EU borders.** When animals are rejected at the borders of third countries, they are stuck for days and weeks, confined on the transport vehicles under unbearable conditions, often dying in agony under the custody of the competent authorities.

**Up to date, there is no system in place in the EU that assures that the animals can return to the EU in such emergency situations.** On the contrary, **conflicting EU animal health regulations prohibit their return** from exactly those third countries that are the main importing countries of EU animals.

**Up to date, the EU animals are transported on sub-standard vessels, flying black and grey flags according to the Paris MOU.** This means that these ships pose an extraordinarily high risk to maritime traffic, as well as to the lives of the animals and crew on board, and to the environment. Even vessels flying a grey flag still suffer so many deficiencies and risks that some vessels have been detained in ports up to 10 times. However, **a permanent ban on these black and grey flagged vessels, justified due to their immense deficiencies, has not been yet implemented.**

Up to date, the EU has been ignoring the International Convention for Prevention of Pollution from Ships (MARPOL) by polluting special sea areas with animal dead bodies, discharges of wash waters contaminated with disinfectants, and disposing manure from livestock vessels. In addition to systematic MARPOL breaches, in the years 2021–2023, 75% of the livestock carriers (48 ships) were reported to have pollution prevention deficiencies.

**Live animal exports lack ethical, environmental and economic justification<sup>120</sup>.**

We must put an end to these unnecessarily long transports, during which animals are subjected to pain, fear and suffering, by prioritising the export of animal products over live animals.

**The time is crucial now.** Council Regulation EC 1/2005 is finally being revised. This is long overdue.

**For 25 years, the current regulation has proven unenforceable due to numerous loopholes. Why should it be now enforceable? It's time to stop pretending that the competent EU authorities can ensure compliance. The current regulation lacks clarity, allowing for broad and inconsistent interpretation.**

The EU Commission's proposal<sup>121</sup> for a new regulation is to be welcomed and could improve the welfare of the transported animals in some aspects. **But it clearly lacks to ban live exports to third countries without animal welfare standards.** This is simply not compatible with the EU's understanding of animal welfare.

**In the event of import refusal and rejection of animals at borders of third countries, the Commission's proposal does not foresee any solution to what happens to these animals.**

→ The current measures under Article 66 (3) of Regulation (EU) 2017/625 can in no way be considered sufficient, have systematically not been applied and are not feasible in practice, as the numerous tragedies in this report show.

→ A "pre-certification" system as proposed in Article 32 (3) of the Commission's proposal cannot be seen as guarantee that the transport will not be refused to enter the importing non-EU country. There can always be errors in the transport documents (e.g. wrong/missing ear tags, wrong vaccination dates etc.) that were not detected in advance but only upon arrival of the transport at the non-EU border. There may also be short-term changes in the import requirements of the third country that were not communicated and taken into account before the departure of the animals. Additionally, this type of "pre-certification" is only proposed for transports by livestock vessels but not for exports by road or roll-on-roll-off ferries. I.e. these horrific transports we have documented at the Turkish border of Kapıkule and at the port of Tanger-Med, Morocco, would not even have been included in this "pre-certification" system.

Furthermore, **the Commission's proposal does not offer a solution that ensures that the exported animals are not subjected to enormous pain and suffering in the third countries due to the lack of animal welfare guarantees.** It does not even contain a provision to restrict the export of live animals to so-called "white-listed" countries that have equal or higher animal welfare standards than those in the EU and that have proven their proper implementation.

At present, **in the Commission's proposal, the journey time at sea (including by livestock vessel and Ro-Ro ferry) is not considered as journey time.** The journey on vessels is as challenging as road transport for the animals. Therefore, the time the animals are transported on sea must not be seen as "resting time" but has to be counted as journey time.

<sup>120</sup> Human Behaviour Change for Life (2023). *The Business Case: the benefits of a carcass over a live animal trade.* Eurogroup for Animals. <https://www.eurogroupforanimals.org/library/business-case-benefits-carcass-over-live-animal-trade>

<sup>121</sup> [https://food.ec.europa.eu/system/files/2023-12/aw\\_in-transit\\_reg-proposal\\_2023-770\\_0.pdf](https://food.ec.europa.eu/system/files/2023-12/aw_in-transit_reg-proposal_2023-770_0.pdf)



**Enough is enough.**

**It is time to take a stand – let's embrace the urgent change needed!**

Once again, Animals' Angels and AWF urge the Member States, the Parliament and the Commission – listen to the calls of the EU citizens, veterinarians, scientific experts and NGOs in the field!

**Take a stand for the animals and vote for an EU-wide export ban to third countries that do not have animal welfare guarantees and from where animals cannot return to the EU!**

**Animals are sentient beings, not commodities. We have a responsibility towards them and all too long we have used them for our own profits and benefits, neglecting to pay full regard to their welfare requirements and our own core principles and values laid down in Art. 13 TFEU.**

**In our opinion, the only responsible solution is to stop the export of live animals to animal welfare high-risk countries – now!**

**AWF** ANIMAL  
WELFARE  
FOUNDATION  
Im Einsatz für Tiere

**A** ANIMALS' ANGELS  
we are there with the animals

