

**NGOs perspective
on animal welfare during long distance transport by land and sea**

ICFAW – International Coalition For Animal Welfare
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**Multi-regional Whole Journey Scenario Workshop on Long-distance Transport
by Land and Sea between Europe, the Middle East, and North Africa**
7 - 9 November 2023, Tunis, Tunisia



**World Organisation
for Animal Health**
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ICFAW Members work in 150 countries worldwide, employ over 2,000 members of staff including scientists and veterinarians and have millions of supporters. We work on all the issues on which the WAOH develops guidelines and assist countries with implementing the agreed WAOH guidelines.



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NGOs and live export

NGOs have been **documenting first-hand** very long journeys, the **animal suffering involved**, and the **problems** that can occur. We often brought to light problems that were unknown.

Nevertheless, we have not limited ourselves to **calling for a ban but** have been sending reports with information and recommendations and meeting the authorities, discussing solutions.



Three Legal Pillars for Live Export from the EU

Agriculture policies (of which live export is part) **must pay full regard to the welfare of animals**, according to article 13 of TFEU.

Live export from the EU shall be limited according to whereas 5 of Reg. EC No. 1/2005.

EU animal welfare rules on animal transport must apply **beyond EU borders** until final destination, according to the ECJ ruling 424/13.

Main Animal Welfare Challenges During Export and Solutions:

The EU rules on protection of animals during transport cannot be ensured outside the EU because they cannot be imposed on non-EU states. Even often journey logs end at EU borders and do not continue.

Possible Solutions

Revision of the EU Regulation regarding the journey log (ongoing) + **bilateral agreements** incl. AW or **national initiatives** re JL (*any in place?*).

Terrestrial Code

The WOAH Terrestrial Code lays down **internationally agreed provisions to continue protection outside** the EU. To date NGOs find they are **scarcely implemented** in many countries.

Common Violations of Animal Welfare Requirements During Export and Possible Solutions:

Animals transported outside the EU are subjected to handling and slaughter practices that are considered illegal and cruel in the EU



Possible Solutions

Regulatory requirements similar to the Australian ESCAS (*were they successful?*) or bilateral agreements incl. animal welfare (*any in place?*).

Terrestrial Code

The WOAH Terrestrial Code dictates provisions on animal welfare during handling and slaughter but to date NGOs find they are not implemented in many countries.



Common Violations of Animal Welfare Requirements During Export and Possible Solutions:

The problems that already exist in the EU worsen with increasing distance and crossing borders, by land and sea

Insufficient or non-existent stables for unloading and rest

High densities

Complicated management of animals falling ill in transit, no vets available, no euthanasia

Dangerous conditions on livestock vessels

Despite temperatures exceeding 35 °C in some destination countries, vehicles without air-condition are approved. Ships can become death traps

Difficult and limited management of water, food, bedding /manure for the animals during long journeys

Untrained operators (drivers, crew)

Possible Solutions

List of unloading facilities; contingency plans (with police contacts, rescue services, competent authorities for transit, premises for emergencies*), treatment of sick/euthanasia on board; lower density; seasonal suspensions; AW monitor/daily log.

(Has this been feasible so far? Are there good examples?)

* (annex 4, template in the Network Document on Checks Before Journeys when Live Animals are Destined for Export by Road)

Terrestrial Code

Articles 7.3.5. + 7.3.9.

Resting points

Article 7.3.10 + 7.2.9.

Care and humane killing of sick in transit

Article 7.2.3.

Presence of a veterinarian or substitute on the vessel

Article 7.2.5 + 7.3.5.

Need for an emergency plan

Common Violations of Animal Welfare Requirements During Export and Possible Solutions:

Borders and customs procedures are not designed and equipped for live animals, whether by road or sea

Waiting times are variable and unpredictable

No stables for unloading and handling animals in emergencies

No priority for animal transport

Borders can become death traps

Possible Solutions

Official list of borders/ports with constantly updated opening times*, indicating presence of unloading facilities + priority.

*(annex 3, template in the Network Document on Checks Before Journeys when Live Animals are Destined for Export by Road).

Terrestrial Code

Chapter 5.6

Border posts should be organized and equipped for the animal trade and have the facilities for watering and feeding. Each country should have a list of border posts.

Article 7.2.10

For sea exports, priority and immediate unloading at port facilities



Unpredictable waiting times at borders documented by NGOs:

Example: In November 2021, German pregnant heifers remained on board 2 days at the port of Tanger-Med in Morocco. Recently on 30.10.2023, trucks with Spanish lambs waited approx. 5 hours before leaving the port and on 02.11.2023 it took 1.5 hour.



Example: The EU Commission evaluated average 6 hours to cross the BG-TR border. NGOs have documented variable times over the years. Most recently, on 17.09.2023, a truck with German heifers from Hungary waited for 20.5 hours with the animals on board.



Common Violations of Animal Welfare Requirements During Export and Possible Solutions:

Import criteria appear sophisticated. A small mistake has catastrophic effects. Animal health rules are also not compatible with live transport and animal welfare, by road and sea

Animal transports cannot travel back in case of an irregularity concerning health issues.

When an irregularity is found, animals remain confined on board the vehicles and are not unloaded for times incompatible with animal welfare.

Possible Solutions

Border authorities/countries coordinate so that the exit point can **detect any irregularities in advance** and accommodate the animals until these are resolved.
When animals cannot be unloaded: list of solutions (sending back or humane killing) to adopt within a **fix short term**.

Terrestrial Code

Article 7.2.11 + 7.3.11.
The welfare of the animals should be the first consideration in the event of a refusal to import. **Animals should be unloaded. If animals can't be unloaded, WOA should find a rapid solution.** Supply of feed and water must be allowed when animals remain on board.

- **Example:** Romanian heifers remaining on board the truck in Turkish territory for 26 days (loaded on 18.08.2022, border-crossing on 22.08.2023). Some calved and died in a huge amount of dung, near a stable. Eventually, the surviving heifers, despite being unfit for the journey, were transported for more than 2000 km to Iraq.
- **Example:** Spanish cattle remained on board vessels Elbeik and Karim Allah for more than 3 months in 2021, being refused import by Libya for blue tongue suspicion and wandered in the Mediterranean, left alone by the competent authorities.



Pictures taken from the Guardian and The Animal Reader



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Common Violations of Animal Welfare Requirements During Export and Possible Solutions:

There is a lack of destination checks on arrival and exchange of information with the EU authorities



Possible Solutions

Bilateral agreements and a homogenous template for the feedback concerning AW (any good examples?)



Terrestrial Code

Article 7.2.3. + 7.3.2.

The receiving Competent Authority should report back to the sending Competent Authority on *significant* animal welfare problems.

There is a lack of traceability of the animals and their fate, by the EU authorities

Example: EU cows were found in markets and slaughterhouses in Morocco, cruelly handled and slaughtered after 1-2-4 years from the export*.

Example: Cows and bulls found in poor physical conditions and not treated or cruelly handled in stables and markets in Qatar and Egypt.

*Animals' Angels dossier, 2023: "Export of live animals to non-EU countries without animal welfare guarantees – time to take responsibility according to Article 13 TFEU" and video links for the authorities





Conclusion

We believe these problems must be solved before live exports are approved, not while they are happening.

We NGOs are concerned for EU animals:

- to date we find the terrestrial code is not applied by several non-EU animal importing countries;
- solutions have been discussed for at least 10 years but there are only sporadic examples of where some of them have become real.

Woah can play a decisive role.

It would be useful to survey the points listed here and prepare a protocol, easy and quick to consult, collecting existing good practices/achievements and spread them for implementation in more States.

Thank you

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