



6 June 2022

Marc Fesneau  
President of EU Agriculture Council

Zdeněk Nekula,  
Minister of Agriculture of Czechia  
Next President of EU Agriculture Council

Anna-Caren Säterberg, Minister for Rural Affairs of Sweden  
Final President of EU Agriculture Council in current Trio

Dear Mr Fesneau, Mr Nekula and Ms Säterberg,

### **Need for the EU Regulation on the welfare of animals during transport to be strengthened**

The undersigned organisations are writing to you in your capacities as Presidents of the EU Agriculture Council during the Presidency trio of France, Czechia and Sweden.

The Commission plans to propose a new Regulation on the protection of animals during transport in 2023. We urge you to press the Commission to ensure that the proposed new Regulation is in line with the requests of European citizens many of whom wish this legislation to be much stronger in its protection of animals.

In the Commission's recent public consultation to support the fitness check of EU animal welfare legislation, 95% of respondents were in favour of introducing maximum journey times, 94% were in favour of a prohibition on the transport of unweaned calves and other vulnerable animals, such as pregnant cows, and 94% considered that the export of live animals to non-EU countries for slaughter should be prohibited.

Our detailed proposals are set out in the Eurogroup for Animals [White Paper](#). Our key requests include the following:

Please reply to:

Peter Stevenson OBE  
Compassion in World Farming  
Place du Luxembourg 12,  
Brussels B-1050, Belgium  
Email: [peter.stevenson@ciwf.org](mailto:peter.stevenson@ciwf.org)

## **The EU should shift to transporting meat, carcasses and genetic material instead of live animals**

Indeed, in its Recommendations adopted in January 2022, the European Parliament recommended that live transport should be replaced by a meat, carcasses and genetic material trade as much as possible (Recommendation 10).

## **A prohibition on live animal exports to third countries**

We welcome the statement made to the Council in June 2021 by the Netherlands, Germany and Luxembourg and in particular their call for “an EU-wide ban of long-distance transports of livestock to third countries by road and by sea”. We urge you during your Presidencies to build support for this among the Member States, as this reflects European citizens’ views.

Two recent Commission overview reports on live exports to non-EU countries by sea and road reveal a multitude of deficiencies.<sup>1</sup> The report on exports by road states that most transporters do not meet EU rules on the protection of animals during transport after leaving the EU. The report on exports by sea shows that neither the exporters nor the Member State authorities are giving any proper consideration to the animals’ welfare during the sea journeys and that the ECJ Judgment C-424/13 is widely ignored.

Investigations by animal welfare organisations – including as recently as in 2021 – reveal that animals are regularly slaughtered in ways that involve great suffering in the Middle East, Turkey and North Africa with no attempt to respect the OIE international standards on welfare at slaughter.

In light of the immense suffering during long journeys to third countries and at slaughter in many such countries, we fully agree with the call by the Netherlands, Germany and Luxembourg for a ban on live exports to third countries.

## **A prohibition on the transport of unweaned animals**

Unweaned animals should not be transported. They suffer greatly during transport. They do not yet have a fully developed immune system and so are vulnerable to disease during transport; this can result in very high on-farm use of antimicrobials post transport. Nor are unweaned animals yet able to regulate their body temperature well and so are susceptible to heat and cold stress during transport. Unweaned animals need to be fed milk replacer but as this cannot be done while they are on a truck they often go for 20 hours or more without feed. Depriving unweaned animals of feed for so long leads to hunger and insufficient intake of energy and protein.

The Parliament recognised the problems that are inherent in the transport of unweaned animals and recommended that the transport of such animals should be avoided and not allowed for calves below four weeks of age, except for journeys of under 50 km carried out by farmers (Recommendation 104). While this is helpful, it is not strong enough. We believe that the transport of unweaned animals should be prohibited altogether. The Commission has said that “calves could be considered as unweaned under the age of two months and lambs under the age of six weeks”.<sup>2</sup>

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

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

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

The vulnerability of these animals to suffering during transport is recognised by the Parliament which recommended that the transport of poultry, rabbits and end-of-career animals should only be permitted to the closest available species-appropriate slaughterhouse and the network of

mobile and local slaughterhouses should be enhanced so that a maximum limit of four hours' transport of end-of-career animals can be attained in the future (Recommendations 111 & 114).

### **Pregnant animals**

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

### **Temperature limits**

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

### **Inspection of consignments during loading**

We fully support the Parliament's recommendation that Member States should ensure that consignments are inspected during loading before each journey to ensure that the requirements of Regulation 1/2005 on floor space and headroom are observed, that the ventilation and water systems are operating properly, that the drinking devices are working properly and are appropriate for the species being carried, that no unfit animals are loaded, and that sufficient feed and bedding is provided (Recommendations 44 & 82).

### **Assembly centre hopping**

We also support the Parliament's recommendation that measures should be adopted to prevent 'assembly centre hopping' aimed at circumventing journey limits to the final destination (Recommendation 91).

Yours sincerely

Animals' Angels, Julia Havenstein, Chairwoman  
Animal Equality, Matteo Cupi, Vice President for Europe – Animal Equality  
Animals International, Gabriel Paun, EU Director  
Animal Save Movement, Nicola Harris, Communications Director  
Animal Welfare Foundation, Iris Baumgärtner, Vice-Chair  
Animals without Borders, Anita Euschen, Director  
Compassion in World Farming, Peter Stevenson OBE, Chief Policy Advisor  
Ethical Farming Ireland, Caroline Rowley, Director  
Eurogroup for Animals, Reineke Hameleers, CEO  
Eyes on Animals, Lesley Moffat, Director  
FOUR PAWS, Pierre Sultana, Director European Policy Office  
Israel Against Live Shipments, Yaron Lapidot, Founder  
PATAV, Constança Carvalho, Representative  
Welfarm, Ghislain Zuccolo, General Manager

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<sup>1</sup> DG(Sante) 2019-6834 & 2019-6835

<sup>2</sup> Letter from the Commission to the Member States dated 2 December 2009. SANCO D5 DS/dj D(2009) 450351