

Exports of Farmed Animals to Third Countries

A Summary of Animal Welfare–Related Problems

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1 Legal framework:

- **Regulation (EC) No 1/2005, Article 3**, establishes the principle that the transport of animals must not be carried out in a way that could cause injury or unnecessary suffering to the animals.
- The judgment of the **Court of Justice of the European Union (CJEU) C-424/13** states that the „organiser of the journey must submit a journey log which, in the light of the arrangements for the journey as planned, is realistic and indicates that the provisions of that regulation will be complied with, including for the stages of the journey which are to take place in the territory of third countries, that authority being empowered, should that not be the case, to require changes to those arrangements to ensure compliance with those provisions throughout the journey.
- **Regulation (EU) No 2017/625 (Official Controls Regulation – OCR), Articles 3 and 66(3)**
- **Regulation (EU) 2020/692, Art. 178, in conjunction with Regulation (EU) 2021/404, Annex II**

2 Reality:

Through years of investigations, we have documented that export transports, and in particular sea transports, regularly involve violations of Regulation (EC) No 1/2005.

The last official inspections of the animals take place at the EU’s external borders. After that, the animals often remain in transport vehicles or on vessels for several days and are transported thousands of kilometres further without any veterinary inspections or treatment.

There is no reliable feedback on compliance with Regulation (EC) No 1/2005 and the welfare of the animals during the transport section outside the EU. In the case of sea transport: consignments as stated in the Journey log are distributed on the vessels; during onward transport from destination ports, general cargo trucks are frequently used, without roofs and without partitions. **Compliance with CJEU judgment C-424/13 is therefore not possible.**

Since 2016, EU complaints submitted by us have led to **audits by the European Commission** (e.g. in Turkey and in EU ports). **The Commission’s reports (DG SANTE*) confirm a realistic risk to animal welfare on certain routes to third countries.**

(*Audit reports DG SANTE 2017-6109, DG SANTE 2017-6110, DG SANTE 2018-6447, DG SANTE 2018-6449)

From audit report DG SANTE 2017-6110, ‘Final Report of a Fact-Finding Mission Carried Out in Turkey from 05 to 08 September 2017’: **“On hot days, there is a high risk on this route that animals will be subjected to unnecessary pain and suffering.”**

Export transports regularly and systematically violate applicable law:

- Long road and sea journeys: considerable stress and suffering for the animals
- Lack of controls for the transport section outside the EU
- Lack of emergency plans and animal welfare measures in cases of transport delays and import refusals at borders
- Return of animals to the EU not possible due to conflicting EU animal health legislation
- CJEU judgment C-424/13 – implementation up to the final destination in the third country not possible
- Regulation (EC) No 1/2005: enforcement up to the country of destination not possible
- Exports of animals to so-called “animal welfare high-risk countries” → national animal welfare laws are missing or not implemented
- International animal welfare standards of the WOAHA are not implemented

The dossier on exports to 10 non-EU countries prepared jointly with Animals’ Angels (March 2025) shows that in Turkey, Morocco, Lebanon, Iraq, Libya, Ukraine, Russia and Central Asia, Moldova, Lebanon and Albania, there is a high and realistic risk to animal welfare (violation of the precautionary principle under Article 3 of Regulation 1/2005).

https://www.animal-welfare-foundation.org/files/downloads/2025_04_AWF_AA_Export_Dossier_FOR_WEBSITE.pdf

3 Why are exports of live animals to Third Countries in breach of EU legislation?

a) Lack of animal welfare legislation in importing countries / minimum international animal welfare standards (WOAH) are ignored

- International animal welfare standards of the WOAH are not implemented
- Cruel restraint and slaughter methods

→ Member States, EU authorities and the WOAH have no enforcement powers in third countries.

b) Inadequate implementation of EU regulations (Reg. 1/2005, Reg. 2017/625) due to:

- Lack of unloading facilities (control posts) outside the EU
- Lack of monitoring possibilities for animal transports up to the place of destination (who monitors? who controls?)
- Approval of unsuitable, outdated vessels with a high-risk profile
- Lack of feedback on the journey leg outside the EU (animal consignments according to Journey logs are distributed on the vessels, at the latest during onward transport from the destination port) and on the condition of the animals
- Lack of data for retrospective checks
- Lack of emergency measures in cases of transport delays and import refusals
- Lack of possibilities for re-import

4 Transport delays or refusals – example: Turkish border Kapikule

Between 2010 and 2025, AWF observed a total of 764 animal transporters over 158 days. For 380 of these transports, we documented the duration of the border crossing. This required two teams: one in Kapitan Andreevo (BG) and one in Kapikule (TR), to document entry into and exit from the border area/no-man's-land:

- 99% (378 of 380 transports) > 2 hours
- 56% (211 of 380 transports) > 12 hours
- 26% (100 of 380 transports) > 24 hours
- 8% (32 of 380 transports) > 48 hours
- 2% (7 of 380 transports) > 1 week – 4 weeks

After the tragedy in October 2024, in which 69 pregnant cattle and their calves died under horrific conditions at the border, the Commission agreed with Turkey on pre-checks of health certificates. According to the head of the Kapikule border inspection post (meeting on 25 September 2025), this will prevent only around 50% of the problems.

Legal requirements and reality in cases of transport delays

Measures pursuant to Article 21(3) of EU Control Regulation No 2017/625: “(...) Where consignments of animals are held **for more than two hours**, the competent authority shall ensure that all necessary arrangements are made for the care of the animals and that, where necessary, the animals are fed, watered, unloaded and accommodated.”

In all these cases, Article 21 was ignored: the animals were not unloaded and accommodated (with only a few exceptions and for short periods), and the animals had to remain on the

transport vehicles during the waiting time. Even for a committed driver, adequately supplying every animal with feed and water in the confined space of a transport vehicle is extremely difficult and, in most cases, not feasible.

In addition, there is a lack of rest and exercise, critical hygiene conditions, heat and rising ammonia concentrations, aggression between animals due to thirst and hunger, and injured, sick and dead animals remaining on the vehicles.

Legal requirements and reality in cases of transport refusals

Measures in the event of transport refusals pursuant to Article 66(3) of EU Control Regulation No 2017/625:

- “Destruction” of the animal consignment (practically difficult, time-consuming due to legal clarifications, especially with animal owners: 4 weeks in the case of the 69 cattle from Brandenburg in Sept/Oct 2024; 2 weeks in the case of the 42 cattle from Romania in Oct 2024)
- Sending the consignment back to a place outside the EU (?)
- Subjecting the animals to special treatment or possibly to a destination other than originally planned (Turkey: cattle were repeatedly resold onward to Iraq, although the maximum transport time of 29 hours cannot be complied with due to the lack of control posts)
- **These measures are not suitable to prevent animal suffering.**
- **Member States and EU authorities have no enforcement powers in third countries (see case in October 2024).**

Fazit zu Exporttransporten in die Türkei

- The enormous animal suffering at this border has been a known fact since 2010.
- EU Member States and the Commission are not able to ensure compliance with international minimum requirements (WOAH) or EU animal welfare law once animal transports reach Turkish territory.
- The FVO mission in 2017 concluded: “At this border, there is a high risk of animal suffering.”
- **Necessary consequence and demand: animal transports to Turkey must not be authorised.**

5 Possibilities for re-import into the EU in the event of transport refusal

Ungulates from the EU may return to the EU **if the animal health requirements under Article 178 of Regulation (EU) 2020/692 are fulfilled**. The refusing importing country must be listed in Annex II of Regulation (EU) 2021/404:

Chile, Greenland, Iceland, Canada, New Zealand, Switzerland, United Kingdom, USA.

None of the main importing countries for European animals are listed. Therefore, there is no possibility for the re-import of the animals.

6 Conclusions and demands

- EU-wide ban on exports to animal welfare high-risk countries
- Exports of animals only to “whitelist” countries that have introduced animal welfare standards equal to or higher than those of the EU and that actually enforce them in practice, and
- Exports of animals only to countries from which the re-import of rejected animals into the EU is permitted in accordance with Article 178 of Commission Delegated Regulation (EU) 2020/692 in conjunction with Annex II of Commission Implementing Regulation (EU) 2021/404.

Animal welfare high-risk countries: animal welfare standards below EU standards, not enshrined in national law, not implemented, not enforced.