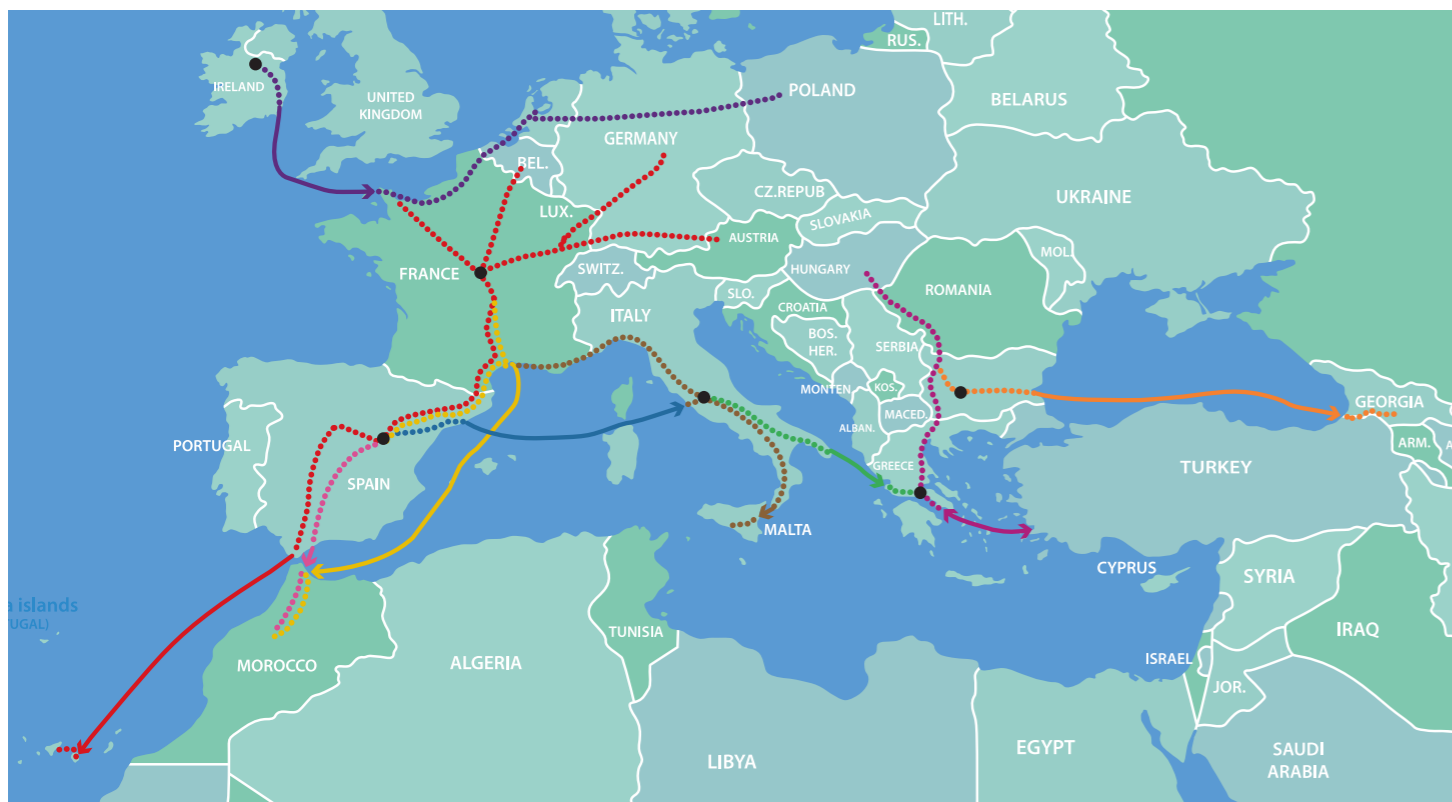


Sea transport by roll-on-roll-off ferries – the journey times at sea matter!

Your vote for a value-based,
future-oriented European Union counts!

A dossier by Animals' Angels





Examples of Ro-Ro ferry transport routes* for animals within and outside the EU:

- red: from Cádiz, Andalusia, to Canary Islands, Spain – duration on Ro-Ro ferry: **38 h to 50 h and more**
- yellow: from Marseille, France, to Tanger-Med, Morocco – duration on Ro-Ro ferry: **approx. 44 h**
- pink: from Algeciras, Spain, to Tanger-Med, Morocco – duration on Ro-Ro ferry: **ca. 2 h**
- blue: from Barcelona, Spain, to Civitavecchia, Italy – duration on Ro-Ro ferry: **approx. 20 – 22.5 h**
- purple: from Rosslare, Ireland, to Cherbourg, France – duration on Ro-Ro ferry: **approx. 17.5 h**
- green: from Bari/Brindisi, Italy, to Igouminista/Patras, Greece – duration on Ro-Ro ferry: **approx. 9 h / 16 h**
- brown: from Villa San Giovanni, Reggio Calabria, to Sicily, Italy – duration on Ro-Ro ferry: **approx. 0.5 h**
- magenta: from Keratsini, Piraeus, to Kos Island, Greece (+ vice versa) – duration on Ro-Ro ferry: **approx. 15.5 h**
- orange: from Burgas, Bulgaria, to Batumi, Georgia – duration on Ro-Ro ferry: **approx. 60 – 72 h**

*Solid lines: Examples of Ro-Ro ferry transport routes for animals, starting from EU ports. Dotted lines: examples of road transport routes to/from the ports. Please note that these examples are not exhaustive.

Cover picture:
Transport of Spanish bulls for slaughter by Ro-Ro ferry via the port of Marseille to Morocco, July 2024

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Photos: Animals' Angels e.V.
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**EU Commission proposal:
the counting of the journey time at sea shall be suspended!**

In the proposal for a new Regulation on the protection of animals during transport¹, the EU Commission proposes that the time the animals spend at sea, i.e. from the moment the animals are loaded on the vessel until the moment the animals are unloaded at the port of arrival, shall not be counted as journey time. The proposal does not distinguish between sea transport by livestock vessel or by roll-on-roll-off ferry (Ro-Ro ferry) on which the animals are transported on board the trucks that are loaded on the ferry.²

Also, for unweaned calves, lambs, kids, piglets and foals, sea transport shall not be counted as part of the journey time.³

The only provision laid down in the EU Commission's proposal when suspending the journey time at sea is the following: **Watering and feeding regime shall be maintained during transport by sea.**⁴

- For "adult" cattle, sheep, goats and pigs: after every 10 hours, the animals must be provided with water, if not offered ad libitum, and food.⁵
- For equine animals: feed and water must be provided ad libitum or at least after every 4.5 hours.⁶
- For unweaned animals: water must be provided ad libitum and the animals must be fed every 9 hours by species-specific milk or appropriate milk replacement.⁷

This proposal is not enough as it does not prevent the animals from suffering! Here are the reasons why:

- Transport stressors continue at sea.
- Transport stressors and animal welfare hazards increase with duration of journey time – this also applies to Ro-Ro ferry transports.
- No emergency measures possible in case of sick or injured animals during Ro-Ro ferry transports.
- No proper access and no unloading of animals possible on board the Ro-Ro ferries in cases of emergency.
- No veterinarian available during Ro-Ro ferry journeys.
- No limitation of the time the animals are confined on board the trucks during Ro-Ro ferry journeys.
- Proposal on Ro-Ro ferry transports not in line with latest science.
- Proposal on Ro-Ro ferry transports not providing resting periods for the animals after sea journeys.
- Proposal on Ro-Ro ferry transports not preventing the circumvention of road transport time limits.
- Outdated rules must be adapted to the animals' needs.

¹ COM(2023) 770 final, 2023/0448 (COD), Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of animals during transport and related operations, amending Council Regulation (EC) No 1255/97 and repealing Council Regulation (EC) No 1/2005, 07.12.2023

² Art. 30 par. 1 of Commission's Proposal, Recital 41 of Commission's Proposal

³ Art. 29 par. 3 of Commission's Proposal

⁴ Annex I Chapter V points 1.1 and 1.2 of Commission's Proposal

⁵ Art. 27 of Commission's Proposal

⁶ Annex I Chapter V point 1.1 of Commission's Proposal

⁷ Art. 29 par. 4 of Commission's Proposal

Animals' Angels statement:

Commercial transports, if they must happen, should be limited to the absolute minimum for all animals no matter in which category relevant to human interests they are categorized and in which type of transport vehicle they are transported by road, sea or air. Long journeys exceeding 8 hours should be avoided for all animals. We would demand the entire 'farm' animal industry to be reconsidered and to dare to question whether it is in keeping with the times to kill animals for food production. Unfortunately, the strong EU agricultural sector is not ready for a real change – despite all the urgency. But the change must be initiated, now.

In our opinion, the Commission's proposal has the potential to improve the welfare of transported animals in many ways. **However, we clearly disagree with the proposal to suspend the journey time at sea (including Ro-Ro ferries) as this is based solely on economic interests. Animal welfare considerations are not taken into account.**

Allowing the transport of animals confined for days on board the trucks which are loaded onto Ro-Ro ferries without a time limit and calling this a 'rest period' for the animals is not only out of date and does not respect the welfare needs of the animals, but also contradicts scientific findings, disregards societal expectations and falls far short ethical considerations on the protection of animals during transport.

→ The EU Commission's proposal does not take into account that transport stressors continue for the animals at sea:



The journey time at sea must be considered as travel time and added to the road transport time. There is no justification for not considering the time the animals have to spend on a truck which is loaded on a ferry.

- The animals are confined on board the trucks in restricted spaces and with restricted movement.⁸
- The access to food and water for the animals is limited. In some cases, not even food for the animals is carried with the trucks on board the ferry, even though the part of the sea journey alone takes nearly two days.⁹
- In case there are significant delays in the sea crossing, there is no possibility to organise additional food.
- In the case of unweaned animals, it is not possible to feed the very young animals with milk or milk replacer on board the trucks, regardless of whether they are transported on board the trucks by road or by Ro-Ro ferry.¹⁰

⁸ [Redacted]
⁹ [Redacted]
¹⁰ <https://www.eyesonanimals.com/wp-content/uploads/2024/09/2024-March-21-29-Investigation-into-the-welfare-of-Irish-calves-exported-to-factory-farms-in-The-Netherlands-and-Poland.pdf> / https://www.eyesonanimals.com/wp-content/uploads/2023/08/2023-March-20-24-Export-of-unweaned-calves-from-Ireland-to-NL_FINAL.pdf

- The animals are exposed to the constant movement of the vessel and especially in high seas, the animals must take enormous efforts to compensate for the movements of the vehicle and to keep their balance.¹¹
- The animals are exposed to ambient and weather conditions during the journey leg at sea.
- When the trucks with the animals on board are loaded in closed decks of the ferry, the animals are usually exposed to warm and sticky air conditions even though the vessel is equipped with forced ventilation and air-conditioning systems.¹²
- When the trucks with the animals on board are loaded on open decks of the ferry, the animals may be exposed to important differences in the temperatures during night and daytime, to blazing sun, wind, high humidity and spraying water.¹³
- Bedding material cannot be exchanged and worsens over the time, especially on very long Ro-Ro ferry transports.¹⁴
- In some cases, the drivers or attendants of the animals do not have proper access to their animal trucks as the trucks are parked close next to each other on the ferry deck so that e.g. feeding or watering the animals manually is not possible.¹⁵
- Additional stressors such as long waiting times at the port of departure or arrival increase the total transport time for the animals on board the trucks.¹⁶
- During waiting times at the ports but also on the open decks of the ferries when animal trucks are loaded first, the trucks are often parked for a prolonged period of time in the direct sun due to lack of shaded areas. Especially at high summer temperatures, this often leads to heat stress and suffering for the animals confined on board the trucks.¹⁷
- Exceeded journey times are regularly documented.¹⁸

→ Transport stressors and animal welfare hazards increase with the duration of journey time – this also applies to Ro-Ro ferry transports!

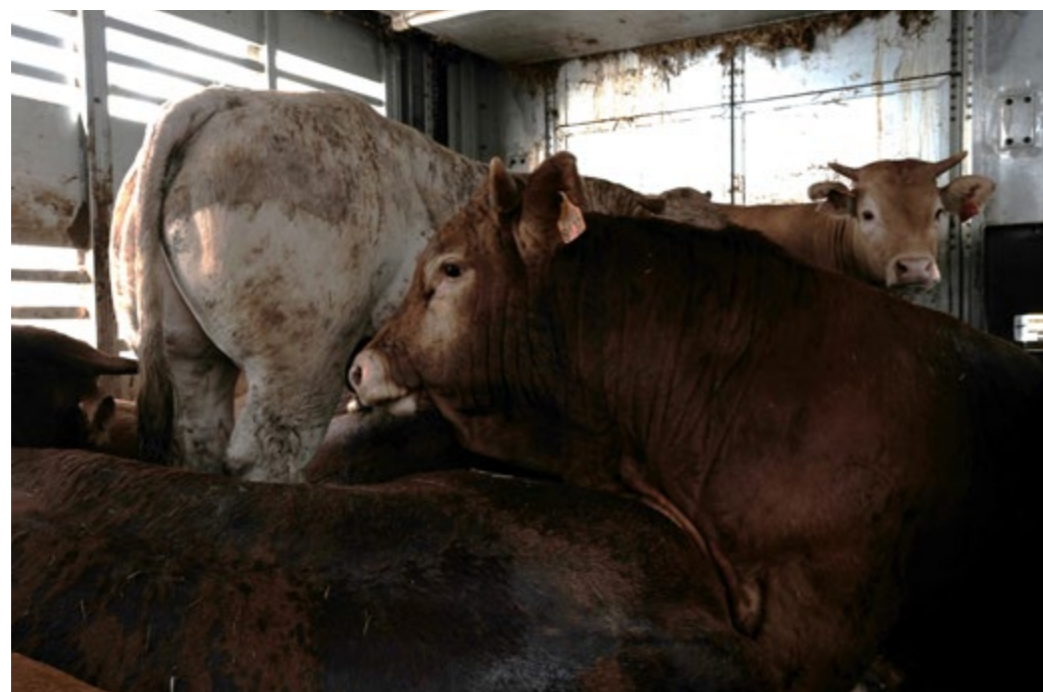
¹¹ [Redacted]
¹² https://www.diariodecadiz.es/noticias-provincia-cadiz/Mueren-borregos-asfixia-Algeciras-Ceuta_0_526748115.html
¹³ [Redacted]
¹⁴ <https://www.animals-angels.de/neuigkeiten/beitrag/tiertransporte-auf-die-kanaren-lkw-hat-motorschaden-kaelber-liegen-und-stehen-in-guellebad.html>
¹⁵ <https://www.animals-angels.de/neuigkeiten/beitrag/italien-hitze-und-schlechte-wasserversorgung-ueber-2000km-transport-fuer-franzoesische-bullenkaelber-nach-griechenland.html>
¹⁶ [Redacted]
¹⁷ [Redacted]
¹⁸ [Redacted]

According to the European Food Safety Authority (EFSA, 2022)¹⁹, welfare concerns and hazards associated with road transport, such as handling stress, motion stress and sensory overstimulation, heat stress, prolonged hunger and thirst, lack of space and restriction in movement etc., are all applicable to the transport by Ro-Ro ferries which even present further concerns.

E.g. motion stress is considered even more relevant during sea journeys on Ro-Ro ferries than during road transport, especially "if the sea is rough and/or vehicles are not properly secured against movement in any direction of the ferry."

EFSA considers exceeded maximum journey times as one of the main welfare concerns in Ro-Ro ferry transports, as the waiting times in the port before and after the sea voyage plus the duration of the sea journey lead to the total time the animals spent inside vehicles exceeding the recommended journey time.

Examples of transport stressors and consequences for animals on Ro-Ro journeys:



Insufficient space for the animals to lie down and rest at the same time during a very long journey. The animals were confined in these crowded conditions on board the truck for more than 57 hours, including a Ro-Ro journey leg of more than 44 hours. Transport of Spanish bulls via the French port of Marseille to Morocco, July 2024.



Example of severe heat stress: exhausted bull Zoltan, panting with open mouth and showing breathing rates of ~200 breaths/minute. Transport from Hungary to the Greek isle of Kos, including a Ro-Ro journey leg of more than 15.5 hours from port of Keratsini to Kos. Temperature inside the truck measured above 41°C and 25.5% humidity, overcrowded transport conditions and exceeded journey times, August 2020.

When animals are transported on closed decks on Ro-Ro ferries, the lack of adequate ventilation and temperature control can have fatal consequences for the animals.

E.g., 181 sheep died of asphyxiation during a relatively short Ro-Ro transport from the Spanish port of Algeciras to Ceuta in October 2011, as they were transported on the closed deck of the ferry in overcrowded conditions where temperatures inside the truck reached over 40°C while outside temperatures were only around 21°C.²⁰



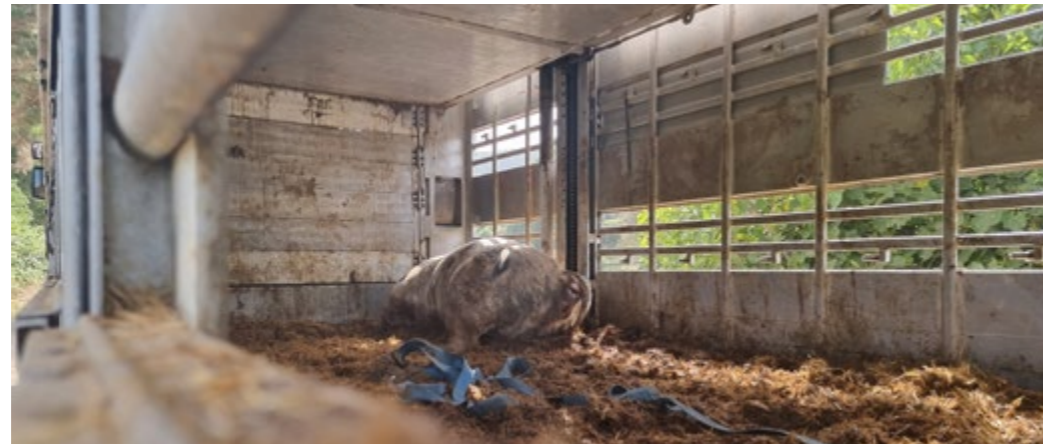
Exhausted calf Amélie, in poor condition and showing elaborated breathing upon arrival in Tenerife. The animals were confined for more than 80 hours on board the truck, including a Ro-Ro journey leg of more than 45.5 hours. Transport from mainland Spain to the island of Tenerife, October 2022.



The calf Gabriela did not survive the Ro-Ro transport from Spain (Aragon) via port of Cádiz to Gran Canaria, June 2023. The transport took at least 70 hours 40 min in which the animals were confined on board the truck, including a Ro-Ro journey leg of more than 49 hours 45 min.

¹⁹ 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, Spooler H, Stahl K, Velarde A, Viltrop A, Winckler C, Earley B, Edwards S, Faucitano L, Marti S, de La Lama GCM, Costa LN, Thomssen 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>

²⁰ https://www.diariodecadiz.es/noticias-provincia-cadiz/Mueren-borregos-asfixia-Algeciras-Ceuta_0_526748115.html / <https://www.elmundo.es/elmundo/2011/10/23/andalucia/1319364539.html>



The calf Isabelle did not survive the Ro-Ro ferry transport from Spain (Catalonia) via the port of Cádiz to Tenerife, July 2022. The transport took more than 74 hours in which the animals were confined on board the truck, including a Ro-Ro journey leg of more than 43.5 hours.

In many cases, the total transport times are prolonged for the animals due to unnecessary waiting times, transport delays and/or re-loading events before or after the Ro-Ro ferry transport part.

Recent examples from 2024:

1. Transport of ovines from Greek isle of Kos to Greek mainland, April 2024:



Sheep and goats were re-loaded from small pick-ups onto two trucks which were not authorized for long journeys, i.e. the trucks are not equipped with drinkers or ventilation systems. Only the next morning, after more than 22 hours have already passed with the animals loaded on board the vehicles, the trucks embarked the ferry destined to the port of Keratsini, mainland Greece. In total, the animals were confined on board the trucks for more than 41.5 hours, including a Ro-Ro journey leg of 15.5 hours to be further transported to a Greek slaughterhouse four driving hours far from the port. During the whole time, they did not receive any food or water. Transport of sheep and goats from Kos Island to a slaughterhouse on the Greek mainland, April 2024.

2. Transport of calves from mainland Spain to Canary Islands (Tenerife), July 2024:



The truck was parked at a gas station near the port of Cádiz, Spain – with the animals loaded on board throughout the night, waiting for embarkation of the ferry only the next morning. Not only taking into account the excess of time of more than eight hours that the animals had to spend additionally on board the truck is significant in this context but also the fact that the transport could have been carried out perfectly by night, reducing the stress for the animals especially in terms of heat stress. The animals were confined on board the truck for more than 63 hours, including a Ro-Ro journey leg of approx. 44.5 hours. Transport of heifers and 'feeder' calves from mainland Spain to Tenerife, July 2024.

3. Transport of Belgium calves from mainland Spain to Canary Island (Tenerife), July 2024



The transport part from the control post to the embarking of the ferry at Cádiz port was poorly organized causing delays in transportation during which the animals had to spend additionally on board the truck. Transport delays were caused due to a vehicle, a tractor and an additional driver change including the transfer of the animals onto another means of transport. In addition, the transport arrived at the port around 12h 20min before embarking on the ferry. This leads to a transport delay of 11 hours and 53 min: 20min additional stop for changing the tractor and driver; 1h 13min for the means of transport changing procedure including the transfer of the animals onto another vehicle; 10h 20min early arrival to the port (please note: the arrival to the port two hours prior departure is considered adequate). The animals were confined on board the truck for more than 70 hours, including a Ro-Ro journey leg of more than 44 hours. Transport of Belgium 'feeder' calves from Spanish mainland to Tenerife, July 2024.



→ The EU Commission's proposal does not provide a solution for emergencies when e.g. animals fall sick or are injured during the Ro-Ro ferry journey:

During ferry transport, the animals cannot be helped in cases of emergency, sickness or injury. There is no proper access to the animals as they cannot be unloaded.

Usually, to adequately attend to a sick or injured animal, the animals must be unloaded. But this is obviously not possible on a Ro-Ro ferry, as the animals cannot be unloaded from the truck. Accordingly, it is very unlikely that the driver or attendant of the animals can reach the sick or injured animal. In fact, it is almost impossible to provide first aid to an animal inside a fully loaded truck. In the case of adult cattle or horses, this could actually be life-threatening for a person when climbing inside the truck.

EFSA (2022) confirms the difficulties to attend to animals in case of emergencies. **"In a RO-RO ferry, it will not be possible to unload animals if they need emergency care."**²¹



No access to the animals at all during Ro-Ro journey leg of 9 -10 hours: The space between the animal trucks (red arrows) and the other cargo trucks was so narrow that it did not even allow the passage of the guardian in charge of checking the condition of the animals during transport, let alone allow access to the animals for their proper inspection and care. Transports of cattle via port of Bari, Italy, to Greece, June 2023.

²¹ 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, GortazarSchmidt C, Michel V, Miranda Chueca MA, Padalino B, Pasquali P, Roberts HC, Spooler H, Stahl K, Velarde A, Viltrop A, Winckler C, Earley B, Edwards S, Faucitano L, Martí 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>



There is no veterinarian available during Ro-Ro ferry journeys.

Transports with Ro-Ro ferries (within/from the EU) are often very long journeys, especially considering, e.g., the transports to the Canary Islands where only the part of the sea journey can take 50 hours and longer²². If an emergency occurs and an animal needs immediate veterinary care, there is no way to call a veterinarian at sea.



No veterinary treatment and care granted to the sick calf Magda during the Ro-Ro ferry transport. She was unable to stand up upon arrival at destination and suffered from severe respiratory disorder, exhaustion, and possibly shipping fever. The animals were confined on board the truck for more than 85.5 hours, including a Ro-Ro journey leg of more than 50.5 hours. Transport from Spain (Aragón) to Gran Canaria, October 2022.



Example of an accident on a Ro-Ro ferry transport from Barcelona, Spain, to Civitavecchia, Italy, November 2004. Due to poor securing of the animal transport (truck with trailer) on board the ferry, the trailer fell over during the sea journey. No veterinarian was on board; no emergency measures could be taken for the animals at sea. Horses and cattle were loaded on two decks. **The situation was chaotic: for quite some time it was unclear where to unload, euthanize or treat the injured animals. It was impossible to provide emergency measures on board the ferry. The trailer could not be opened while on the ferry, since there was no possibility to unload the animals.** At the destination port, the trailer was put up with a crane which was moved onto the ferry. When lifting the trailer up the first time, it fell over once more. They managed to put it up at the second try. **The animals in the trailer were in a horrible state; they were lying on top of each other. According to the veterinarian present, most of the animals suffocated during the long hours they were left in the trailer. In the end, 11 of 13 horses and 2 of 11 bulls died.**²³

²² [REDACTED]
²³ [REDACTED]

→ The EU Commission's proposal does not limit the time the animals are confined on board the trucks during Ro-Ro ferry transports:



The proposal allows that animals can be confined inside trucks loaded on Ro-Ro ferries without any time limit, i.e. theoretically indefinitely. This is not acceptable.

During Ro-Ro ferry transports, the animals must spend the entire time at sea inside the trucks, where their movement is severely restricted. Even though the Commission's proposal now provides more space for the animals, this is not enough to justify confining the animals on board the trucks for several days.

According to EFSA (2022), "Restriction of movement is to some extent inherent to animal transport as the animals cannot move freely, especially during the transit stage. Thus, restriction of movement is regarded as highly relevant during this stage. The prevalence is high, as movement restriction will affect all animals in the transit stage. Therefore, **the duration of restriction of movement depends on the journey duration, and severity is expected to increase with increasing duration**, as the lack of possibility to move freely is expected to become more problematic for the animals. Restriction of movement may lead to frustration, discomfort and potentially distress."²⁴



The journey time at sea must not be considered as "rest" for the animals.

Apart from the fact that the animals are confined to restricted space on board the trucks and exposed to other transport stressors such as movement at sea, for an adequate 'rest', the animals would need to be able to lie down whenever they desire, rest, eat and drink. This is not given inside a road vehicle. The minimum space allowances do not allow all the animals to lie down and rest at the same time.

According to EFSA (2022), "Resting problems are regarded as highly relevant during the transit stage. The prevalence is at least moderate, as resting problems may affect a large proportion of animals in a moving vehicle, depending on factors such as the driving quality and the space allowance. **Even with ample space, and the possibility to lie down, it is not documented that all cattle in a compartment will or can rest during journeys. Therefore, the duration of resting problems depends on the journey duration, and severity is expected to increase with increasing duration, as the lack of resting becomes more problematic for the animals. Resting problems may eventually lead to fatigue.**"²⁵

Concerning Ro-Ro ferry transports particularly, EFSA (2022) recommends that "Due to the exposure to the hazards generic to road transport plus the additional concerns listed, **voyage duration should not be considered resting time.**"²⁶

²⁴ 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, GortazarSchmidt 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 Loma GCM, Costa LN, Thomssen 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>

²⁵ Ibid.

²⁶ Ibid.

During Ro-Ro ferry transport, it is not possible to exchange the bedding material. This is particularly relevant for (very) long ferry journeys. According to EFSA (2022), "without adequate bedding (type and/or quality and/or quantity) animals will be less motivated to rest lying down during journeys and may be exposed to slips, falls and weakness."²⁷



Example of very dirty bedding material, soaked with urine and excrements. The animals were confined on board the truck for more than 74 hours, including a Ro-Ro journey leg of more than 43.5 hours. Transport of 'feeder' calves from mainland Spain to the Island of Tenerife, July 2022.

→ The EU Commission's proposal does not provide resting periods and unloading of the animals at the port of arrival but allows their further road transport, regardless of the time the animals have previously spent at sea:



Resting periods outside the truck in which the animals can recover, rest, move freely, stretch, and act out their social behaviour, etc., are essential after a strenuous and stressful journey.

As explained above, there is no justification for considering the journey time at sea as "resting time" for the animals. Ro-Ro ferry transports are often very long and, in many cases, far exceed the maximum allowed transport times for the animals. It is therefore all the more incomprehensible why the Commission's proposal does not stipulate that the animals must rest outside the transport vehicle for 24 hours after arrival at the port of destination if the maximum journey time was reached or exceeded during the sea journey part.

EFSA (2022) recommends, among others, that:

- "Based on evidence on continuous welfare consequences involving stress and negative affective states **the journey duration should be kept to a minimum.**"²⁸
- "To end the exposure to the hazards of transport and to allow the animals to eat, drink and recover, **they need to be unloaded from the transport vehicle** to suitable premises."²⁹

²⁷ Ibid.

²⁸ <https://www.efsa.europa.eu/en/plain-language-summary/welfare-cattle-during-transport>

²⁹ Ibid.

Please note:

In the current Regulation EC 1/2005, Point 1.7 (b) of Chapter V of Annex I requires that "In the case of transport by sea on a regular and direct link between two geographical points of the Community by means of vehicles loaded on to vessels without unloading of the animals, the latter must be rested for 12 hours after unloading at the port of destination or in its immediate vicinity unless the journey time at sea is such that the voyage can be included in the general scheme of points 1.2 to 1.4". I.e. the animals must be unloaded and rested for 12 hours after arrival at the port of destination when exceeding the maximum allowed journey time at sea.



This contrasts with the 24-hour resting period required for animals who were transported by road, after the maximum journey time was reached.

→ **Why should animals transported by sea/Ro-Ro ferry receive a shorter resting period than animals transported by land? There is no logical explanation for this.**

As described above and confirmed by EFSA (2022), welfare concerns and hazards associated with road transport, such as handling stress, motion stress and sensory overstimulation, heat stress, prolonged hunger and thirst, lack of space and restriction in movement etc., are all applicable to the transport by Ro-Ro ferries which even present further concerns.



The wording of the current Regulation EC 1/2005 only requires the unloading of animals after arrival at the port of destination for intra-EU transports but excludes transports to non-EU countries from this provision.

→ **This is an illogical loophole.** As seen above, resting periods are essential for the animals, no matter if the destination is within or outside the EU. If there is no possibility to unload the animals at the port of arrival or its immediate vicinity after reaching the maximum journey time, the transport should not take place – regardless of whether it is an intra-EU transport or an export transport to a non-EU country.

Animals' Angels calls for the revised Regulation to stipulate that if the time the animals spend on a Ro-Ro ferry exceeds 8 hours, the animals must be unloaded and rested for 24 hours before embarking and after disembarking unless they are unloaded at the final destination within two hours (last animal unloaded from the means of transport).



Watch out for the trap! Ro-Ro ferries must not be used in the future to circumvent journey time limits laid down for road transport.

The EU Commission's proposal does not prevent the proposed shorter journey times for 'slaughter' animals from being circumvented by the use of Ro-Ro ferries. For example, pigs intended for slaughter could be loaded on Ro-Ro ferries at the port of Livorno, Italy, and then transported to Sicily by sea for more than 20 hours which would no longer be possible by road for good reasons. The same would be possible, e.g., for cattle for slaughter from Spain via the port of Barcelona to Civitavecchia, Italy, by a Ro-Ro ferry transport of around 22.5 hours.

→ Actually, this kind of circumvention of new, more animal-welfare friendly rules is already taking place – please see example below: Detour via French port Marseille to circumvent new Spanish decision, p. 18.

Legal loopholes, which would allow the circumvention of journey time limits and higher animal welfare standards by shifting from road to sea/Ro-Ro transports, must be prevented at all costs in the revised Regulation.

Therefore, it is essential that the journey times at sea, including on Ro-Ro ferries, must be counted as such and added to the total journey time of the animals.

Our demand I:

The journey time at sea must be considered in the context of a complete journey, together with the journey times on the road.

When planning a journey that involves a segment on a Ro-Ro ferry, the calculation of the total journey time must include:

- the loading of the animals at the place of departure
- the road transport to the port
- the unloading and resting period of the animals at a control post at the port of departure or in its close vicinity, in case of exceeded journey times
- the waiting time at the port before embarking the ferry
- the journey time at sea
- the waiting time at the port of arrival
- the unloading and resting period of the animals at a control post at the port of arrival or in its close vicinity, in case of exceeded journey times
- the road transport after disembarking the ferry to the place of destination
- the unloading of the animals.



The journey time calculation starts with the loading of the first animal at the place of departure and ends with the unloading of the last animal at the place of destination – regardless of whether a Ro-Ro ferry journey is part of the transport or not.



Particularly alarming is that the EU Commission's proposal does not limit the sea transport of unweaned animals!

It is well-known that unweaned animals who are still on a milk diet are particularly vulnerable and fragile, and that they have a **"reduced capacity to withstand the challenges of transport"**³⁰.

³⁰ EFSA AHAW Panel (EFSA Panel on Animal Health and Welfare), Nielsen SS, Alvarez J, Bicoût 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, Thomssen 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>

For example:

- “Unweaned calves between 2 and 4 weeks of age experience an immunological gap due to the shift between passive and active immunity, and therefore they are more susceptible to long journeys than weaned calves.”³¹
- “For unweaned lambs, procedures of unweaning and prolonged transport immediately after are stressful and exhaust body reserves. From an animal welfare point of view, weaning lambs sometime before transport would be advantageous.”³²
- The transport of newly weaned piglets can pose unique challenges due to their size, having lower body reserves and being less tolerant of cold stress.”³³

These vulnerable, highly sensitive and very young animals should not be subjected to the additional transport stressors caused by Ro-Ro ferry transport and long journeys.

Animals' Angels calls for a journey time limit of a maximum of eight hours for unweaned animals, which would be already a far-reaching compromise.

According to EFSA (2022) the transport of unweaned calves should not exceed eight hours – “unless technology to allow on-truck feeding is developed”.³⁴



The trucks commonly used to transport unweaned animals are not equipped with adequate feeding systems that would allow on-truck feeding.

To date, unweaned animals cannot be fed on board trucks, regardless of whether they are transported on long journeys by road or on Ro-Ro ferry transport.

In order to avoid that the unweaned calves experience prolonged hunger during transport, EFSA (2022) recommends that “Maximum journey duration should take into account the time from last feeding. In order to allow calves to be loaded/unloaded and a 3-h post-meal rest, journeys should not exceed 8h.”³⁵

Example from practice: long transports of unweaned calves from Ireland to mainland EU by Ro-Ro ferries:

Repeatedly, the organisations Eyes on Animals, Ethical Farming Ireland and L214 have documented that **on the Ro-Ro transport route from Ireland to French control posts, unweaned calves are not fed for more than 30 hours.**³⁶

The EU Commission confirms in their audit report DG(SANTE) 2022-7503 that the unweaned calves are not fed during the entire journey from Irish assembly centres to the control post in Cherbourg and that “the competent authorities indicated that **transporters are not making arrangements to feed the unweaned calves on the roll-on-roll-off vessel**, although the journey time reaches in total approximately 22 to 24 hours.”³⁷

In their response to the audit report DG(SANTE) 2022-7503, the Irish competent authorities state, among others, that in order to improve animal welfare standards during transport, they will continue their research project “into ways to safely feed calves on milk replacer on board trucks during the ferry voyage from Ireland to continental Europe such that the well acknowledged risks of colic, diarrhoea and dehydration are adequately managed.”³⁸

→ **Despite ongoing research, there has not been found a safe method for feeding of unweaned calves on board trucks.**

→ **On Ro-Ro ferry transports, unweaned animals cannot be provided with feed.**

→ **The only conclusion must be a journey time limit for unweaned animals to max. eight hours following latest scientific recommendations and including Ro-Ro ferry transports.**

Our demand II:

The transport of unweaned animals shall not be permitted on Ro-Ro ferries except the total journey time from the loading of the first animal and including the journey time at sea until the unloading of the animals at the destination does not exceed eight hours and the truck is equipped with a feeding system appropriate for unweaned animals.



Unweaned calves from Ireland, transported by Ro-Ro ferry via Cherbourg, France, to mainland EU. Truck not suitable for the transport of unweaned calves (Copyright Eyes on Animals, Ethical Farming Ireland, L214).

³¹Velarde, A., Teixeira, D., Devant, M. & Martí, S 2021, Research for ANIT Committee – Particular welfare needs of unweaned animals and pregnant females, European Parliament, Policy Department for Structural and Cohesion Policies, Brussels, [https://www.europarl.europa.eu/RegData/etudes/STUD/2021/690874/IPOL_STU\(2021\)690874_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2021/690874/IPOL_STU(2021)690874_EN.pdf)

³² 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, Miranda de La Lama GC, Nanni Costa L, Thomsen PT, Ashe S, Mur L, Van der Stede Y and Herskin M, 2022. Scientific Opinion on the welfare of small ruminants during transport. EFSA Journal 2022;20(9):7404, 101 pp. <https://doi.org/10.2903/j.efsa.2022.7404>

³³ 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, Miranda de La Lama GC, Nanni Costa L, Thomsen PT, Ashe S, Mur L, Van der Stede Y and Herskin M, 2022. Scientific Opinion on the welfare of pigs during transport. EFSA Journal 2022;20(9):7445, 108 pp. <https://doi.org/10.2903/j.efsa.2022.7445>

³⁴ 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, CostaLN, Thomsen 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>

³⁵ Ibid.

³⁶ <https://www.eyesonanimals.com/wp-content/uploads/2024/09/2024-March-21-29-Investigation-into-the-welfare-of-Irish-calves-exported-to-factory-farms-in-The-Netherlands-and-Poland.pdf> / <https://www.eyesonanimals.com/wp-content/uploads/2023/08/2023-March-20-24-Export-of-unweaned-calves-from-Ireland-to-NL-FINAL.pdf>

³⁷ DG(SANTE) 2022-7503: Final Report of an Audit of Ireland Carried out from 7 to 17 June 2022 in order to Evaluate the Protection of Unweaned Calves During Long Journeys, <https://ec.europa.eu/food/audits-analysis/audit-report/details/4700>

³⁸ <https://ec.europa.eu/food/audits-analysis/audit-report/details/4700>

Did you already know...?

Detour via French port Marseille to circumvent new Spanish decision

Based on the decision of the Spanish Ministry of Agriculture, Fisheries and Food on 18 March 2024³⁹, since 1 April 2024, Ro-Ro transports of live animals may only leave the port of Algeciras in the south of Spain to Morocco when 1.) the animals depart from Spanish territory, and 2.) the transport time to the port of Algeciras does not exceed eight hours. This decision is to be welcomed as there is no control post in the vicinity of the port of Algeciras.

Consequently, animals from Northern Spain or other EU countries such as France may not be exported to Morocco via the port of Algeciras anymore as they cannot reach Algeciras in eight hours. So, the exporters of animals from e.g. Northern Spain found a new "alternative" route via the French port of Marseille.

Observations on the Marseille – Morocco route:

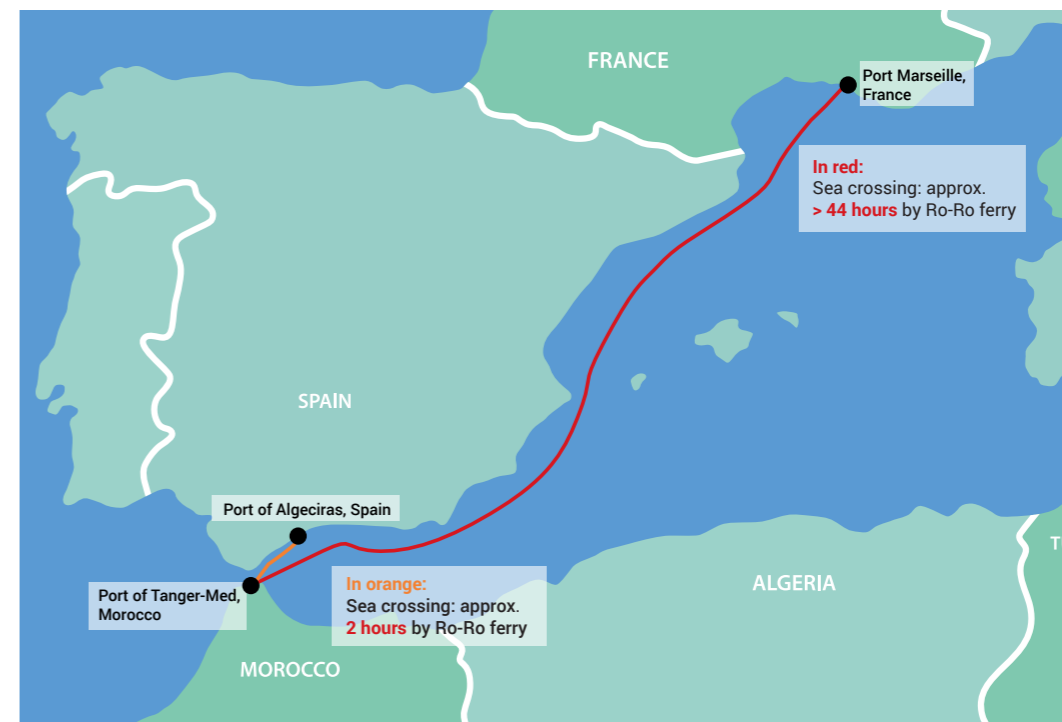
During an investigation carried out in July 2024, Animals' Angels documented three transports with young cattle being exported via the port of Marseille by Ro-Ro ferry to Morocco.

Table 1:
Information received, and observations made about three Ro-Ro transports to Morocco via the port of Marseille. N.B.: All times indicated in Central European Time (CEST).⁴⁰

TRUCK NO.	1	2	3
Animals transported	Young cattle (mainly males), destined for fattening and slaughter		
Origin of animals	France	Spain	Spain
Example of ear tag	FR3310619843	ES020605584112	ES040109546505
Transporter (road)	French transporter	Spanish transporter	Spanish transporter
Transporter (sea)	Same for all three transports: La Méridionale (FR)		
Place and time of loading:	unknown, France, 24.07.2024, 18:00	Huesca, Spain, 24.07.2024, around 22:00	Huesca, Spain, 24.07.2024, around 21:00
Unloading at CP Marseille port:	25.07.2024, time unknown	25.07.2024, 07:30	25.07.2024, 07:00
Loading at CP Marseille port:	25.07.2024, 16:00	25.07.2024, 16:00	25.07.2024, 16:00
Embarkation on Ro-Ro ferry in Marseille:	25.07.2024, 17:50	25.07.2024, ca. 17:45	25.07.2024, ca. 17:45
Disembarkation at port of Tanger-Med:	27.07.2024, 14:03	27.07.2024, 14:06	27.07.2024, 14:23
Time on ferry	44h 13min	44h 21min	44h 38min
Leaving port Tanger-Med	27.07.2024, 18:18	27.07.2024, 18:16	27.07.2024, 18:16
Waiting time inside port Tanger-Med	4h 15min	4h 10min	3h 53min
Arrival at destination in Morocco	Unknown	28.07.2024, 01:09	28.07.2024, 01:37
Time animals are nonstop confined on board the truck	At least > 54h 14min	More than 57 hours	More than 57.5 hours

³⁹ As consequence of COMMISSION IMPLEMENTING REGULATION (EU) 2023/372 laying down rules on the recording, storing and sharing of written records of official controls performed on livestock vessels, on contingency plans for livestock vessels in the event of emergencies, on the approval of livestock vessels and on minimum requirements applicable to exit points

⁴⁰



Particular animal welfare concerns observed on the export route via Marseille:

1. Very long confinement of the animals on board the trucks of more than 54 resp. 57h
2. No unloading of the animals upon arrival at the port of Tanger-Med
3. Prolonged waiting times (~4h) for customs clearance at the port of Tanger-Med
4. No unloading of the animals at final destination within 2h after disembarkation

Consequence:

This route via the port of Marseille has significantly worsened the welfare situation for the transported animals, which the decision of 18 March 2024 was undoubtedly intended to avoid.

The duration of the sea journey by Ro-Ro ferry has increased significantly from approx. 2 h (via Algeciras) to more than 44 h (via Marseille), leading to a significant increase in the time in which the animals are confined nonstop on board the trucks. This is not acceptable.



Bull Emilio sticking his head through the opening of the truck on board the ferry and looking at the sea during the Ro-Ro journey from Marseille, France, to Tanger-Med, Morocco, July 2024.



ANIMALS' ANGELS

we are there with the animals



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Animals' Angels is a Germany-based animal welfare organisation founded in 1998. Our commitment is to the so-called 'farm' animals, focusing on the protection of animals during transport. In Europe and worldwide, we are there with the animals on the roads, at animal markets, at borders or at slaughterhouses. We show solidarity with the animals and help on the spot. We document shortcomings, report them and file complaints demanding compliance with the existing animal welfare laws. Where the protection of the animals is not sufficiently regulated, we are advocating for better standards. Animals' Angels work is financed by private donations only.
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