

Revision of journey times for commercial transport of animals in the EU

9 hours for animals intended for slaughter,
4 hours for so-called 'spent' animals:
The vote of a value-based, future-oriented European Union

A dossier by Animals' Angels



Revision of journey times for commercial transport of animals in the EU 9 hours for animals intended for slaughter, 4 hours for so-called 'spent' animals: The vote of a value-based, future-oriented European Union

EU Commission proposal for a new regulation on the protection of animals during transport: 9-hours journey time for animals intended for slaughter

In their proposal¹ for a new regulation on the protection of animals during transport, the EU Commission lays down a maximum journey time of 9 hours for terrestrial animals (other than domestic birds and rabbits) intended for slaughter.

This proposal must now be implemented.

Reasons:

- The current rules are outdated (page 4)
- The current rules are not in line with latest science (page 4)
- There is the need to counteract animal suffering by law (page 7)
- 9-hours-limit is needed to avoid heat stress (page 8)
- 9-hours-limit is needed to mitigate powerlessness in contingency situations (page 9)
- 9-hours-limit is needed to reduce risk of disease spread (page 9)
- 9-hours-limit is needed to harmonize transport time for animals and driving times for truck drivers (page 10)
- 9-hours-limit is needed to counteract delays and excess of transport time (page 11)
- Co-legislators shall implement the opinion of the veterinary experts (page 11)
- Co-legislators shall listen to the European Court of Auditors (page 12)
- Co-legislators shall implement the will of civil society (page 3, 13)
- Transport time limit is needed to align EU rules with internationally agreed WOH standards (page 12)
- 9-hours-limit will contribute to achieve SDGs (page 13)
- No-Go! Striving for low-cost production is not an argument in a value-driven European Union (page 13)

Necessary legal specifications that have not yet been taken into account in the Commission's proposal: Shorter journey times for vulnerable animals:

4-hours journey time limit for so-called 'spent' animals must be specified in the new regulation. Furthermore, it must be specified that 'spent' animals may only be transported on the direct way to the slaughterhouse and not via (an) assembly centre(s).

Reasons:

- 'Dairy' cows, sheep, sows and 'laying' hens at the end of their productive lives are highly vulnerable as they are usually weak and often suffer from health impairments. (page 15)
- High risk that these animals experience additional suffering during transport. A 4-hours journey time limit would significantly reduce this risk. (page 16)
- High risk that the condition of 'spent' animals worsens during transport. A 4-hours journey time limit would significantly reduce this risk. (page 15)
- The vulnerability of these animals must be respected. A 4-hours journey time limit would contribute to this. (page 15,16)
- There is the need to counteract animal suffering by law. A 4-hours journey time limit would contribute to this. (page 16)
- Scientists recommend shorter journey times for 'spent' animals. A 4-hours journey time limit would contribute to this. (page 15)

- The low economic value of 'spent' animals increases the risk that welfare rules are not respected; higher legal barriers must be set. A 4-hours journey time limit would contribute to this. (page 15)
- 'Spent' animals are not only the victims of lax implementation of animal protection laws, but also of criminal business models involving the weakest animals. The new law must put a stop to this. A 4-hours journey time limit would contribute to this. (page 16)
- Especially 'cull dairy' cows and ewes are still traded via livestock markets, auctions and other assembly centres increasing the time, the animals are exposed to stressors. Accordingly, when animals are traded via assembly centres, there is a higher risk for them to experience additional suffering. The new law must put a stop to this by prohibiting the commercialization of 'spent' animals via intermediate points. (page 16)

Animals' Angels statement: Animals' Angels is documenting animal transports in the EU and beyond its borders for more than 25 years. In these years, we have seen too many animals suffering and even dying during the journeys while being ignored and neglected by stakeholders and authorities. Transport conditions improved in the last 25 years and official controls increased. But current rules remain unenforced, are not enforceable or do not meet the needs of the animals and the reality on the roads. And even though we talk about improvements, some of the worst cases we have documented in more than 25 years happened in 2023² and 2024³. They were about animals stuck in trucks for weeks due to import rejections. The animals suffered to death while all efforts by the relevant authorities and international organisations to safeguard the health and welfare of the animals failed. This is highly alarming.

But it is a good thing that in the last 25 years the society has changed. 83% of the public are in favor of restrictions on the journey times of live animals for 'commercial purposes' (for the transport within or from the EU)⁴. There is hardly anyone left who accepts that live animals, sentient beings, are transported over long distances just to make money and rack up the highest profits. Nowadays, hardly anyone would still call animals a commodity – except those who want to make a profit from them. **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 placed. Long journeys exceeding 8 hours should be avoided for all animals and transports of live animals should be replaced by meat transports.** We would demand the entire 'farm' animal industry to be reconsidered and even 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. **We consider the Commission's proposal to limit the journey time for animals intended for slaughter to 9 hours as a viable and realistic compromise and therefore support it.**

¹ 7.12.2023; 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 (Art. 28 paragraph 1, Art.3 point 12)

² Dossier by Animal Welfare Foundation and Animals' Angels on Export transport from the EU to non-EU countries, <https://www.animals-angels.de/awf-aa-live-animal-export-dossier-03-2025>

³ Dossier by Animal Welfare Foundation and Animals' Angels on Export transport from the EU to non-EU countries, <https://www.animals-angels.de/awf-aa-live-animal-export-dossier-03-2025>

⁴ European Commission (2023): Attitudes of Europeans towards animal welfare. Special Eurobarometer 533. Page 51. <https://europa.eu/eurobarometer/surveys/detail/2996> (Last accessed 19.02.2025)

Detailed reasons why the journey time limit of 9 hours is necessary for animals intended for slaughter:

– Outdated: No revision of the animal transport times for more than 34 years

The current Regulation on the protection of animals during transport, Regulation EC 1/2005 came into force 20 years ago. It does not foresee any journey time limit. According to Regulation EC 1/2005, animals can be transported endlessly without any limitation. Despite the fact the Regulation was aimed at protecting the welfare of animals during transport and preventing unnecessary suffering to the animals, it failed to lay down journey time limits. To put it even more precisely, the transport times and the rest periods for the animals today in the Regulation were just copied and pasted from the previous legislation, Council Directive 91/628/EEC. This, even though Regulation EC 1/2005 was intended to resolve the implementation and enforcement problems existing with the directive. The last 35 years of animal transport practice in the EU have shown that animals would have been spared a great deal of suffering if there had been a strict limit on the transport time for animals for slaughter and fattening from the outset. It is now urgent to make up for this omission, to learn from the practice and to reduce the journey time of animals destined for slaughter to a maximum of 9 hours, especially as the duration of intra-EU journeys has increased from 2005 to 2015 for short, long and extra-long transports.⁵

– To be in line with science: Limiting the journey time for animals intended for slaughter to 9 hours maximum is necessary to reach an acceptable level of protection for the animals.

There is scientific consensus that transport poses inherent animal welfare risks and is associated with animal suffering⁶. In 2001, the Food and Agriculture Organization of the United Nations (FAO) stated that 'transport of livestock is undoubtedly the most stressful and injurious stage in the chain of operations between farm and slaughterhouse and contributes significantly to poor animal welfare and loss of production⁷.' Regarding animals unaccustomed to loading and transport - such as animals raised for slaughter - the Scientific Committee on Animal Health and Animal Welfare of the European Commission (SCAHAW) states in the report "The Welfare of Animals during Transport", published in March 2002: "(...) after a few hours of transport welfare tends to become poorer as the length of the journey increases. Hence such animals should not be transported if this can be avoided, and journeys should be as short as possible."⁸ The experts explain that with the increasing duration of a journey, the welfare of the animals generally gets worse because they become more fatigued, incur a steadily increasing energy deficit, become more susceptible to existing infections, and may become diseased because they encounter new pathogens. With increased duration of the journey, other transport stressors increase, too. However, these concerns and scientific findings were ignored when adopting the current Regulation in 2005. With a generous lack of concern, Regulation EC 1/2005 was adopted without laying down any journey time limit. Timely unlimited animal transports are permitted despite recital 5) to the Regulation stating, 'For reasons of animal welfare the transport of animals over long journeys, including animals for slaughter, should be limited as far as possible' and recital 18) affirming that 'Long journeys are likely to have more detrimental effects on the welfare of animals than short ones'. 20 years after the SCAHAW report, the European Food Safety Authority (EFSA) concludes in their 2022 pub-



Long distance transport of French cattle intended for further fattening and subsequent slaughter from the Spanish mainland to the Canary Islands, August 2022. This is the second long distance transport for these animals within their short lifespan of a few months.

lished report on the welfare of animals during transport⁹: 'The amount of time the animals are exposed to hazards is dependent on the journey duration'. Among others, the main outcomes of the EFSA-studies are that 'motion stress and sensory overstimulation start as soon as a vehicle starts moving and continues while the vehicle is moving potentially leading to fatigue and negative affective states such as fear and distress. Pain and/or discomfort from health conditions or injuries can be severe and will worsen over time during transport and may lead to suffering'. Furthermore, EFSA concludes that 'problems associated with lack of resting become greater with increased journey duration and may lead to fatigue. Even when a transport vehicle is fitted with water drinkers, journeys that last more than 9 hours may result to prolonged thirst that can lead to dehydration and associated negative affective states'. Going back to the past, even before the SCAHAW report of 2002, scientists found that stress can turn into suffering for the animals already after a short period of time, and that it must be assumed that after 4 hours of transport and at the latest after 8 hours most animals suffer during transport¹⁰. Thus, the current regulation contradicts its own principles according to which 'no person shall transport animals or cause animals to be transported in a way likely to cause injury or undue suffering to them'¹¹.

Animals' Angels witnesses regularly that during long journeys, the animals suffer from hunger, thirst, exhaustion, heat or cold stress, confinement, social stress, poor air quality due

⁵ Massot, A. et al. 2021, Research for ANIT Committee – Patterns of livestock transport in the EU and to third countries, European Parliament, Policy Department for Structural and Cohesion Policies, Brussels, page 23

⁶ Opinion of the Committee on the Environment, Public Health and Consumer Policy on 20 February 2004 on the proposal for a Council regulation on the protection of animals during transport.

⁷ Guidelines for humane handling, transport and slaughter of livestock, FAO, HSI, 2001

⁸ SCAHAW Report "The Welfare of Animals during Transport", March 2002, p. 95

⁹ EFSA AHAW Panel (EFSA Panel on Animal Health and Welfare), Nielsen SS, Alvarez J, Bicoout DJ, Calistri P, Canali E, Drewe JA, Garin-Bastuji B, Gonzales Rojas JL, Gortázar 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, 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, Page 63 <https://doi.org/10.2903/j.efsa.2022.7442>

¹⁰ Fikuart, K.: Tiertransporte. In: Sambras, H. & Steiger, A. (1997): Das Buch vom Tierschutz. Ferdinand Enke Verlag Stuttgart, p. 496, 497; ders. in TVT-Nachrichten 2/2001, 8 / Hirt, A. et al. (2016) Tierschutzgesetz – Kommentar. Verlag Franz Vahlen, Munich, 3rd edition. Page 861

¹¹ Article 3, General conditions for the transport of animals of Council Regulation EC 1/2005



Above and top on page 7: Transport of lambs for slaughter, Italy August 2023: Poor transport condition, high density, lack of bedding, lack of headroom. 'Low-value' animals = poor transport conditions. These animals must be protected by a strict journey time limit.

to insufficient ventilation, and dirty bedding¹². All too often, also the health of the animals is affected when the animals are exposed for many hours to transport.

After all this, it is evident that a transport time limit is now necessary. Based on the 2022 EFSA's findings, it can be concluded that cattle transport should not take longer than 9 to 12 hours¹³. Pigs should not be transported for more than 8 to 12 hours¹⁴ and sheep¹⁵ and Equidae¹⁶ not longer than 12 hours. The EFSA recommendations for the transport time pre-suppose that the EFSA recommendations about microclimatic conditions and space allowance are followed,¹⁷ which in practice is not given at all, as can be demonstrated by numerous

examples.¹⁸ This means that the EFSA recommendations for transport times are only valid if their other recommendations are also followed. If the other recommendations are not followed, the transport time should be less than what is recommended by EFSA.

And the EFSA studies look at how much suffering the animals can be expected to endure, but do not take into account other parameters that are essential for transportation practice, such as the driving times for truck drivers, which are a maximum of 9 hours per driver. It is essential that the animal transport times and the driving times for the drivers are aligned (see p.10). Therefore, the animal journey time can only be a maximum of 9 hours.

– The same legal requirements – different conditions: The quality of the transport conditions depends on the economic value of the transported animals: It is necessary to counteract suffering of animals intended for slaughter by limiting the transport time to 9 hours.

It is well known that, all too often, the transport conditions and their quality depend on the economic value of the transported animals. In 25 years documenting animal transports in the field in the EU and outside the EU, Animals' Angels clearly notes that the conditions under which the animals are transported are different when it comes to transports of 'high-value' animals or economically poorly rated animals, though the legal requirements are the same. The latter are often animals intended for slaughter. Although the animals obviously have the same needs and experience the same suffering regardless of their economic value, stakeholders are not willing to apply the same level of care during transportation for animals of low economic value as they do for animals of high economic value. Space, bedding material, food, water, ventilation, and rest breaks are important factors in this context. They all cost money and are reluctantly made available when the animals 'have no value'. *'But they go to slaughter*

¹² ANIMAL SUFFERING IS INHERENT IN LONG DISTANCE TRANSPORTS; Lisbon Treaty necessitates ban of Long Distance Transports, Animals' Angels Press 2012

¹³ see footnote no. 9, page 99

¹⁴ EFSA AHAW Panel (EFSA Panel on Animal Health and Welfare), Nielsen SS, Alvarez J, Bicoout 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, Page 89f. <https://doi.org/10.2903/j.efsa.2022.7445>

¹⁵ EFSA AHAW Panel (EFSA Panel on Animal Health and Welfare), Nielsen SS, Alvarez J, Bicoout 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, Page 83, 86. <https://doi.org/10.2903/j.efsa.2022.7404>

¹⁶ EFSA AHAW Panel (EFSA Panel on Animal Health and Welfare), Nielsen SS, Alvarez J, Bicoout 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 equidae during transport. EFSA Journal 2022; 20(9):7444, Page 74. <https://doi.org/10.2903/j.efsa.2022.7444>

¹⁷ See footnote 14, page 71

¹⁸ A dossier by Animals' Angels; https://www.animals-angels.de/fileadmin/user_upload/03_Publikationen/Dokumentationen/2024_09_Animals_Angels_Dossier_The_negative_impact_of_extreme_temperatures_on_animal_welfare_during_transport.pdf; Video by Animals' Angels: Density Problems in Long Distance Animal Transports in the EU (2023), www.animals-angels.de/density

anyway' is a statement that Animals' Angels still hears in 2025. Since it is not possible to carry out sufficient monitoring of animal transports, the only way to counteract the attitude of saving money by circumventing animal welfare rules or by lowering the transport quality is to strictly limit the journey time for 'slaughter' animals to a maximum of 9 hours.

– 9 hours maximum journey time: A solution to avoid heat stress

2011-2020 was the warmest decade recorded¹⁹. This tendency continues. The reasons for global warming are well-known and provide ample justification to limit transport (and 'farm' animal husbandry). However, we are also confronted with another problem. Summers are getting hotter and the farming industry and their advocates in some Member States therefore want to transport animals at very high temperatures and speak out loudly against setting animal-friendly upper temperature limits. This is even though heat stress is one of the main hazards to animal welfare during transport²⁰. With a journey time limit to 9 hours, it would be possible that during the hottest seasons of the year, animal transports are carried out only by night. Especially during extreme weather conditions, every additional hour on board the vehicles leads to stress for the animals – and more so when combined with a high density. When it is hot e.g., pigs are unable to thermoregulate due to constant body contact with others and little air circulation. And not all animals are usually able to reach the (few) drinkers that are available – when the water is turned on. In a crowded compartment, the longer the duration, the greater the risk is that some tired animals lie down and are trampled by the others.



Pig Berta transported for slaughter suffering from heat stress, Italy, August 2024. With a 9-hours journey time limit it would be feasible that all slaughter transports are carried out by night in summer.

¹⁹ https://climate.ec.europa.eu/climate-change/causes-climate-change_en (last accessed 13.02.2025)

²⁰ See 'The negative impact of extreme temperatures on animal welfare during transport', footnote no. 18

– Limiting the transport time for animals intended for slaughter would partially mitigate the fact that there is no adequate network of unloading facilities for animals on transports in case contingency situations occur en route.

In cases of severely sick or injured animals on board the vehicle, or other contingency situations or accidents, it is often very difficult to find appropriate facilities for emergency unloading of the animals. This is due to the low number of control posts in many EU Member States. Appropriately, in such cases, the animals should be unloaded at a control post offering the necessary infrastructure and meeting the animal health requirements. However, currently, there are nine Member States that do not have any control post. Large countries such as Spain, Greece or Romania only have a small number of control posts, not appropriate to the size of the country. The lack of an adequate number of control posts results in the following problems: Despite emergency situations and animals suffering, the animals cannot be unloaded but must continue the route under unacceptable conditions. Veterinarians trying to find solutions for the animals often end up on the path of legal uncertainty. Although they want to help the animals and the drivers, it often works to their disadvantage if they accommodate the animals in private stables as a makeshift solution, as these facilities usually don't offer the sanitary safety standards required for transit facilities for animals²¹. Finally, police forces often turn a blind eye on animal transports, no matter which problems they suspect, knowing that they will have no chance to accommodate the animals in case needed. Emergency situations can occur on short and long journeys. However, when such situations happen on short-distance transports, the place of departure and destination, respectively, is much closer compared to long journeys over several hundreds or thousands of kilometres. So, the animals can be unloaded in a shorter time and veterinary care can be provided more quickly. As a result, currently many Member States are not able to enforce the most basic requirement of the Regulation: to provide appropriate care to injured, sick and severely suffering animals during transport. A 9-hours journey time limit for animals intended for slaughter is necessary to partially mitigate the problem of the lack of sufficient control posts throughout the EU.

– 9-hours transport time limit to reduce limit the risk of spreading diseases

Article 7.3.5.9 of the Terrestrial Animal Health Code²², the internationally agreed standards on animal welfare during transport of the World Organisation for Animal Health (WOAH) states that **animal transport is often a significant factor in the spread of infectious diseases**. Scientists warn that many infectious diseases may be spread as a result of animal transport. For example, outbreaks of swine fever and of foot and mouth disease can be made worse because animals are transported and, in some cases, transmit the disease at rest areas or markets. Major disease outbreaks have very important impacts on animal welfare as well as causing economic problems. EFSA stated in 2011, '*stresses associated with handling and transport may cause latent infections with, for instance, Salmonella or Pasteurella sp. that proceed to clinical disease. Such animals are more likely to infect others during the journey or after arrival at their destination and in many cases (e.g. salmonellosis) this will also increase the risk to public health. This is the case for the whole panorama of the infectious animal diseases.*'²³ If stress for the animals is reduced and the mixing of animals is minimised, disease and hence poor welfare can be prevented or made less likely as '*a particularly important consequence of better*

²¹ Council Regulation (EC) No 1255/97 of 25 June 1997 concerning Community criteria for control posts and amending the route plan referred to in the Annex to Directive 91/628/EEC, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX-3A01997R1255-20070105> (last accessed 20.02.2025)

²² <https://www.woah.org/en/what-we-do/standards/codes-and-manuals/terrestrial-code-online-access/> (last accessed 16.02.2025)

²³ EFSA (2011): Scientific Opinion concerning the Welfare of Animals during Transport. EFSA Panel on Animal Health and Welfare (AHAW), EFSA Journal 2011; 9(1):1966. Page 59. <https://www.efsa.europa.eu/de/efsajournal/pub/1966> (last accessed 16.02.2025)

*animal welfare is that animals are more resistant to pathogens.*²⁴ In this context, EFSA elaborates in their 2022 published report on 'Transmission of antimicrobial resistance (AMR) during animal transport' that, among others, *minimising transport duration would be effective in reducing the transmission of resistant bacteria during animal transport*²⁵. The 9-hours journey time limit is therefore essential to limit the risk of spreading diseases.

– 9 = 9: Social regulation for drivers and transport time for the animals must be congruent: 9-hours journey time limit to harmonize transport time for animals and driving times for truck drivers

The current Regulation EC 1/2005 and Regulation EC 561/2006 on the harmonisation of certain social legislation relating to road transport²⁶ are inconsistent and not synchronised to each other as regards the maximum driving hours and rest periods for drivers compared to animal transport times. While equines and pigs are allowed to be transported 24 hours non-stop and cattle, sheep and goats even 29 hours²⁷, one driver is allowed to drive only 9 hours²⁸. After these 9 hours, the driver must take a rest of 11 hours²⁹. According to Article 3 lit. a of Regulation EC 1/2005, all necessary arrangements must be made in advance to minimise the length of the journey. Practice has shown that the incompatibility of the two Regulations either leads to a prolongation of the journey time for the animals or to the non-observance of the social legislation relating to road transport. At the time, transports over thousands of kilometres and several days are carried out by one driver only and authorised in this way³⁰. Again and again, Animals' Angels observes animal transports parked at rest areas with the animals on board for 9 or more hours, while the driver(s) take their mandatory rest³¹. It is just as undesirable when the drivers exceed their permitted driving hours due to time and economic pressure reaching their physical limits. In this case, they also put their lives at risks and those of the other road users and the animals. Already in 2001, the European Parliament called for 'concrete proposals (...) for harmonising travelling/driving and resting/rest periods for animals and drivers.'³² Decades have passed without any adjustment. To limit the journey time for animals destined for slaughter to 9 hours would enable this long-overdue harmonization and make an important contribution to road safety and the occupational safety of drivers.

²⁴ Council of the European Union (2019): Council conclusions on animal welfare - an integral part of sustainable animal production, adopted on 16 December 2019. Page 3. <https://data.consilium.europa.eu/doc/document/ST-14975-2019-INIT/en/pdf> (last accessed 19.02.2025)

²⁵ EFSA BIOHAZ Panel (EFSA Panel on Biological Hazards), Koutsoumanis K, Allende A, Álvarez-Ordóñez A, Bolton D, Bover-Cid S, Chemaly M, Davies R, De Cesare A, Herman L, Hilbert F, Lindqvist R, Nauta M, Ru G, Simmons M, Skandamis P, Suffredini E, Argüello-Rodríguez H, Dohmen W, Magistrali CF, Padalino B, Tenhagen B-A, Threlfall J, García-Fierro R, Guerra B, Liébana E, Stella P and Peixe L, 2022. Scientific Opinion on the transmission of antimicrobial resistance (AMR) during animal transport. *EFSA Journal* 2022; 20(10):7586, 83 pp. <https://doi.org/10.2903/j.efsa.2022.7586>

²⁶ Regulation (EC) No 561/2006 of the European Parliament and of the Council of 15 March 2006 on the harmonisation of certain social legislation relating to road transport and amending Council Regulations (EEC) No 3821/85 and (EC) No 2135/98 and repealing Council Regulation (EEC) No 3820/85

²⁷ Annex I Chapter V point 1.4 of Council Regulation EC 1/2005

²⁸ Exceptionally 10 hours. In both cases, interrupted by a 45 min break after 4,5 hours driving

²⁹ Exceptionally 9 hours

³⁰ E.g.: Animals' Angels report on transports of pregnant heifers from Denmark to Uzbekistan, 15.-25.04.2021 / Animals' Angels report on transports of pregnant heifers from Austria to Uzbekistan, date of report: 15.05.2021 / Animals' Angels report on a transport of pregnant heifers from Lienen, Germany, to Morocco, date of report: 14.07.2019 (German) / Animals' Angels report on transport of pregnant heifers from Austria to Uzbekistan, date of report: 18.04.2019 (only German) / Animals' Angels letter to CVOs and NCPs of the EU Member States on the problematic use of only one driver for long distance transports – incompatibility between Reg (EC) 1/2005 and Reg (EC) 561/2006, dated 26 August 2019.

³¹ See e.g., Animals' Angels report: LINK <https://www.animals-angels.de/mail/pdf/EXT-ES-Transport-Cattle-Tenerife-Acedo.pdf>

³² European Parliament resolution on the Commission report concerning the protection of animals during transport, text adopted 13.01.2001, Strasbourg.

– Delays and excess of transport time: A common factor that makes it necessary to limit the journey time to 9 hours

The transport and resting intervals laid down by the current Regulation EC 1/2005 are often not respected and exceeded. Or poor or untransparent planning leads to delays in transportation. This happens for example when there are multiple departure places or destination places. This aspect is often neglected in the calculation of the total journey time as additional time is needed when the animals are collected and loaded at different departure places, or when the animals are transported to different destination places. Such multiple pick-ups and multiple unloading events regularly mean a considerable extension of the transport time for at least part of the animals. Over 60% of the transports officially start from an assembly center, which is the start of the counted journey time³³. But the assembly center is usually not the real start of the journey. The animals come from different farms and are grouped together at the assembly center to form a consignment which is then further transported. The time the animals spend at the assembly center is often less than 48 hours. Thus, the transport time from the farms, including stops at several farms to collect the animals, should be added to the travel time from the assembly center. It also happens regularly that, from the final destination indicated on the journey plan, which often is a farm, the animals will be sent on to other farms in the region shortly after arrival. Again, adding extra time on the journey time.

Another way of extending the time indicated in the transport documents is the 'assembly center hopping'. This means that an assembly center is used to camouflage the continuation of a journey by a stop of 6 hours instead of the legally required 24 hours. This happens by declaring the assembly center as destination of the journey and starting a new journey with new transport documents from the same assembly center, while in fact it is just the continuation of the same journey³⁴.

Also, there are unforeseen delays that can be caused by weather, traffic, road conditions, breakdowns or accidents. And they happen more often than one might expect. But often delays are the cause of rather bad and unrealistic planning of the journey time.

Part of this are delays at borders, at ports, etc. concerning the export of animals to non-EU countries. Animals' Angels finds again and again transports stuck at borders because any kind of import document is lacking – for example, the importer did not pay in time or missed a deadline³⁵. Finally, long delays are caused when transporters take long routes to circumvent countries known to strictly enforce Council Regulation EC 1/2005 and have a strong sanction regime³⁶. Reducing the journey time to 9 hours would prevent the most of the beforementioned transport delays.

– Veterinary experts throughout Europe call for a journey time limit for animals intended for slaughter of even less than 9 hours

In their input for the revision of the transport regulation, unanimously adopted in June 2022, 10 points³⁷, the Federation of Veterinarian of Europe (FVE) repeats³⁸: 'Animals should be transported as little as possible, reared as close as possible to the premises on which they are born

³³ Peter Stevenson and Susanna Blattner (2023): A data dump of suffering. The EU's long-distance trade in farm animals exposed. Eurogroup for animals and Compassion in world farming. Page 3

³⁴ See e.g., Animals' Angels Formal Complaint on 'Assembly Center Hopping' in Italy 2023, <https://animals-angels.de/mail/pdf/complaint-assembly-center-hopping-IT.pdf>

³⁵ Animals' Angels (2024): Delays in Live Animal Transport – a Mismatch Between Theory and Practice. https://www.animals-angels.de/fileadmin/user_upload/03_Publikationen/Dokumentationen/Delays_in_Live_Animal_Transport_ANIMALS_ANGELS_2023.pdf

³⁶ Dr Alexander Rabitsch in Parlamentskorrespondenz Nr. 1172, 19.10.2022, https://www.parlament.gv.at/aktuelles/pk/jahr_2022/pk1172 (last accessed 08.03.2025)

³⁷ FVE's input for the Revision of the Transport Regulation: 10 points: https://fve.org/cms/wp-content/uploads/003-FVE-Draft-10-points-transport-Regulation_adopted_R2.pdf (last accessed 14.02.2025)

³⁸ *Ibid.*, page 1



Long transport of lambs intended for slaughter from Romania to Greece, April 2023. Metal nipple drinkers are not designed for ovine animals, but for pigs. The lambs in this transport do not know how to use the drinkers. They bite or lick the devices instead of suckling the water like pigs do. As a result, most of the water drips down instead of being drunk by the lambs.

and slaughtered as close as possible to the point of production.' The FVE advocates that all long-distance transports (over 8 hours) of live animals must be avoided³⁹.

– Review of the European Court of auditors: A strong voice suggesting taking the opportunity for a change to mitigate negative consequences of transport on animal welfare by reducing the length of journey

In its review 'Transport of live animals in the EU: Challenges and Opportunities' the European Court of Auditors states: 'Animal welfare depends on the distance and duration of the journey and on the journey conditions'⁴⁰. Further it states 'The negative consequences of transport on animal welfare could be mitigated by reducing the number and length of journeys, and improving the conditions for live animals during transport'⁴¹.

– EU legislation should set an example by implementing the internationally agreed WOAH standards for the protection of animals during transport, and limit transport times, especially for animals intended for slaughter and fattening.

The World Organisation for Animal Health (WOAH) states in its Terrestrial Animal Health Code (TAHC) that 'the use of animals carries with it an ethical responsibility to ensure the welfare of such to the greatest extent practicable'⁴². Article 7.3.1. TAHC specifies that 'the amount of time animals spend on a journey should be kept to the minimum'. All EU Member States are members

³⁹ Ibid., page 4

⁴⁰ Transport of live animals in the EU: Challenges and Opportunities' European Court of Auditors, 2023, Point 5 and 81; LINK <https://www.eca.europa.eu/en/publications?ref=RV-2023-03> (last accessed 12.02.2025) page 10

⁴¹ Ibid., page 44

⁴² WOAH Terrestrial Animal Health Code, Article 7.1.2. point 6 https://www.woah.org/en/what-we-do/standards/codes-and-manuals/terrestrial-code-online-access/?id=169&L=1&htmlfile=chapitre_aw_introduction.htm (Last accessed 19.02.2025)

of the WOAH and have accordingly committed themselves to the WOAH standards. However, the EU does not implement these standards with regard to transport times. The current Regulation does not foresee an absolute journey time limit. Instead, the Regulation even allows for animals to be transported, including to non-EU countries, without requiring any limit in time. The 9-hours transport time limit would bring the EU legislation more in line with WOAH standards.

– Sustainable Development Goals (SDGs): Limiting the transport time for animals destined for slaughter would make an important contribution to achieving SDGs

Transport as well as animal welfare are considered highly relevant to achieve the SDGs. António Guterres, Secretary-General of the United Nations, states in his foreword of the 2020 Report on SDGs⁴³ '(...) global efforts to date have been insufficient to deliver the change we need (...) and clarifies that 'the 17 SDGs demand nothing short of a transformation of the financial, economic and political systems (...). They require immense political will and ambitious action by all stakeholders.' Currently, animals in the EU are raised, fattened, and slaughtered in different locations, sometimes thousands of kilometres apart. This does not follow a necessity but has developed for the sole purpose of satisfying the economic interests of the sector and maximizing profits. In addition to that, the transport of animals can give rise to additional social and environmental costs (increased road traffic, additional CO₂ emissions). To reach the SDGs, significant changes towards more sustainability are needed within the agricultural as well as the transport sector: The current Regulation allows unlimited transportation of animals in terms of distance and total duration. In a case study from 2017, Wageningen University concludes⁴⁴: 'Throughout the years, several reports produced by important scientific bodies and committees (...) have clearly shown that long-distance transport of live animals for slaughter should be phased out not only due to animal welfare problems, but also due to public health and food security risks. Furthermore, fossil fuel-based transport is an important contributor to global emissions affecting climate. (...) Thus, long-distance transport of live animals has several drawbacks'. The revision of Regulation EC 1/2005 provides the opportunity to remedy drawbacks and to move towards the SDGs. The limitation of the journey time for animals destined for slaughter to a maximum of 9 hours is thus now necessary.

– In view of the above and the positive impact that a reduction in transport time to 9 hours would have on animal welfare and on the environment, purely economic reasons aimed at keeping production costs as low as possible can no longer be tolerated.

In the current discussion about a new regulation on the protection of animals during transport, voices are being raised that ignore scientific evidence, practical experience of the last 20 years and the fact that rules have been constantly ignored by the industry while Member States are unable to properly enforce them. For example, during the exchange of views with EFSA in the European Parliament (joint TRAN-AGRI) on animal transport on 25.01.2025, EFSA's scientific expertise was called 'a provocation to farmers in Europe'⁴⁵. A Member of Parliament even argued that 'reducing the transport time to 9 hours is going to needlessly increase the stress for animals'. Stating that it is 'not for animal welfare' but only 'restrictive bureaucracy'⁴⁶. Quite obviously, such statements are all about keeping costs low and maximizing profits as economic factors are the main driving force for animal transport. Cheap production, however, must not be used as a benchmark for EU values. The 2009-Lisbon Treaty

⁴³ United Nations (2020): The Sustainable Development Goals Report 2020. Page 2. <https://unstats.un.org/sdgs/report/2020/The-Sustainable-Development-Goals-Report-2020.pdf> (last accessed 12.02.2025)

⁴⁴ Baltussen, W. et al. (2009): Sustainable production: transporting animals or meat? <http://edepot.wur.nl/11502> (last accessed 12.02.2025)

⁴⁵ MEP Céline Imart EPP

⁴⁶ MEP Mireia Borràs Patriots



Cattle for fattening and slaughter transported⁴⁷ from Estonia to Poland, September 2024. Over 24 hours-transport under very poor conditions: heavily soiled animals, dirty and slippery floor, no bedding, strong ammonia smell.

explicitly recognizes that animals are sentient beings and that the EU, and its Member States have an ethical responsibility to prevent abuse, pain and suffering to them. While the EU Commission's Vision for Agriculture and Food⁴⁸ can be understood as an answer to the recent farmers' protests aimed at making farming more attractive, it does not forget the EU's concerns about animal welfare and environmental protection and the EU's moral values. The citizens' concerns and EU values must be reflected in the new Regulation on the protection of animals during transport setting strict journey time limits for animals intended for slaughter. Practice has proven that a close monitoring of animal transports is not possible due to lack of human resources, financial resources and infrastructure. Only a strict journey time limit can reduce the suffering of the animals, safeguard their health and limit disease spread.



– Watch out for the trap! Definition of the term 'transport to slaughter': Animals transported for fattening purposes must be included

The proposal of the EU Commission⁴⁹ does not foresee a legal definition of the term 'transport to slaughter'. This could lead to different interpretation and non-uniform implementation of the Regulation. Furthermore, it could lead to misclassification, i.e. to situations where the nine-hours transport-rule for 'slaughter' animals is circumvented by transporting them under the category of fattening purposes. Animals' Angels therefore proposes defining the term 'transport for slaughter' as follows: **'transport to slaughter' means all transport of animals for the purpose of slaughter that will take place within the following eight months.**

⁴⁷ According to indications in the transport documents and Animals' Angels observation

⁴⁸ https://agriculture.ec.europa.eu/vision-agriculture-food_en (last accessed 08.03.2025)

⁴⁹ See footnote no. 1

– Watch out for the trap! Derogating authorisation for long journeys

In their proposal for a new regulation, in Article 28 paragraph 2 the Commission suggests: 'When, within the Union, no slaughterhouses adapted for slaughter of the species and categories of animals referred to in paragraph 1 can be reached within a short journey for a specific place of departure, the competent authorities at the place of departure may grant an authorisation for a long journey to the nearest slaughterhouse adapted to the species transported.'

Animals Angels is concerned about this exception. It must be ensured that it will only be applied in exceptional cases and does not become common practice. Therefore, additional conditions must be established defining in which cases competent authorities at departure places may grant an authorisation based on a possible future Article 28 paragraph 2. It must be clarified that long journeys to other slaughterhouses are not permitted when, for example, nearby slaughterhouses are fully booked and have reached their capacities or when there are hidden economic interests behind it, to use a different slaughterhouse. By defining concrete and precise conditions for the application of paragraph 2, a uniform implementation can be assured within the EU Member States avoiding unfair shift in competition. **Animals' Angels suggests adding concrete conditions which define and clarify such exceptional cases when the derogation of Article 28 paragraph 2 may be applied⁵⁰.**



**Shorter journey times for vulnerable animals:
4 hours maximum transport time for 'spent' animals**



So-called 'spent' or 'end-of-career' animals are taken – different to animals raised for meat production – to the slaughterhouse when they are weak and often suffer from any kind of health impairments. This mainly involves 'dairy' cows, sheep, sows and laying hens. These 'discarded' animals are of low economic value as they have reached their end of 'productive life' and are now submitted to a second career as 'slaughter' animals. 'Spent' animals are in a very delicate, fragile physical condition and their vulnerability makes them prone to serious welfare risks during transport, even on short transport distances from the farm to the nearest slaughterhouse. E.g., 'spent laying' hens have a fragile skeletal system and catching and loading can cause injuries to them as they have a higher risk of bruising and bones fractures when handled⁵¹. 'Spent' sows are sold for slaughter when they fail to rebreed, are too thin or have difficulty walking⁵² and therefore their capability to withstand stressors during transport is reduced. Due to their poorer general condition, even more than in animals raised for meat, the economic incentive is quite low to take special care of these animals during transport to slaughter. EFSA states in their recent findings in relation to the transport of 'cull' cows⁵³ and 'cull' sows⁵⁴: 'If these animals are fit for transport, the journey to a slaughterhouse should be kept to a minimum, be direct and not involve any unloading and reloading at any interim premises'. However, the current Regulation does not consider them and especially does not limit time they may be transported. Practice has shown that since Regulation EC 1/2005 came into force, the system fails to protect 'spent' animals at the end of their productive life. Their last journey to the slaughterhouse is all too often shamefully miserable. The situation is even

⁵⁰ See also FVE, <https://fve.org/cms/wp-content/uploads/Animal-Transport-Proposal-FVE-Comments-R9-1.pdf> (last accessed 16.02.2025)

⁵¹ Baltussen, Willy, Gohar Nuhoff-Isakhanyan, Coen van Wagenberg, 2017. Transport of live animals versus meat; Case studies of spent hens and lambs, using newly developed calculation model. Wageningen, Wageningen Economic Research, p.13

⁵² Grandin, Temple, Transport Fitness of Cull Sows and Boars: A Comparison of Different Guidelines on Fitness for Transport, Animals 2016, p. 1

⁵³ See footnote 9, page 100

⁵⁴ See footnote 14, page 94



'Spent' sow Emma transported to a slaughterhouse in Germany, March 2021. Emma is very thin but still producing milk. She has decubitus ulcers in her shoulder.



Transport of Mia, Laura, Angelina, Tina and hundreds of other 'spent' hens for slaughter, Spain, August 2024. Unbearable transport conditions. Journey time limit of 4 hours is urgently required to protect these animals.

worse when the animals are traded via an assembly centre and their suffering is prolonged to increase economic benefit for the traders. Not even the minimum EU animal protection rules are respected when transporting and marketing them. The problem ranges from the lax implementation of the animal welfare regulations via incompetence and misinterpretation, to criminal business models in the worst cases. The problem is widespread and despite continuous efforts it is not contained and often not even improved. Not only farmers, traders, transporters and slaughterhouse operators are to blame, but also those veterinary officers and private veterinarians who still turn a blind eye when it comes to loading of sick, injured or weak animals. The experience of the last two decades has shown that legal precautions are necessary to adequately protect these animals. The EU legislation must put an end to the additional suffering of 'spent' animals. There is an urgent need to significantly reduce transport times. In this aspect the proposal of the Commission⁵⁵ fails. The following provisions shall be laid for the protection of 'spent' animals:

- **The introduction of an absolute journey time limit for 'spent' animals of 4 hours (including loading and unloading).**
- **(In case that 'spent' animals are not humanely killed on farm) 'Spent' animals may only be transported on the direct way to the slaughterhouse and not via assembly center(s).**

⁵⁵ See footnote 1

Cover picture: Transport of cattle for fattening and slaughter from Estonia to Poland, September 2024

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ANIMALS' ANGELS

we are there with the animals



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.