

Delays in Live Animal Transport – a Mismatch Between Theory and Practice

A documentation by Animals' Angels
with observations from 2019 until mid-2023



ANIMALS' ANGELS

we are there with the animals

Dedication



This dossier is dedicated to Amelié.

She was born in France.

We met her on the Ro-Ro transport route to the Canary Islands.
Together with 79 calves, Amelié was transported from the Spanish mainland to Tenerife
for more than 80 hours while being confined non-stop on board the truck.
Her already very long transport was delayed by more than 12 hours
due to mal-organisation and lack of care of the business operators.

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Cover picture: Bull calf Roman, transported from the Czech Republic to Turkey in August 2021

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Danish piglets, transported to Italy in August 2022 - at temperatures up to 39°C and without continuous access to water. Near the final destination in Italy, the piglets were transferred onto a small vehicle to reach the farm. This reloading event caused a transport delay of nearly four hours for the young animals who were already suffering from heat stress.

INTRODUCTION

It is well known that with the duration of the journey, the welfare of the transported animals gets worse. The longer the transport takes, the more the animals become fatigued, experience hunger and thirst, incur a steadily increasing energy deficit, become more susceptible to existing infections, and may become diseased because they encounter new pathogens. Thus, for animal welfare concerns, veterinarians and scientific experts recommend that animals should be transported as short as possible.

Accordingly, Article 7.3.1. of the internationally agreed animal welfare standards during transport of the World Organisation for Animal Health (WOAH) reads: “The amount of time animals spend on a journey should be kept to the minimum.”¹

EFSA (2022) recently reaffirmed that “the amount of time the animals are exposed to the [transport] hazards is dependent on the journey duration. The number and the severity of hazards that animals are exposed to during transport influence the resultant welfare consequences (...). On the basis of evidence on continuous welfare consequences involving stress and negative affective states, for the benefit of animal welfare, the journey duration and frequency, should be kept to a minimum.”²

Recital 5 of Council Regulation EC 1/2005 demands that for reasons of animal welfare the transport of animals over long journeys, including animals for slaughter, should be limited as far as possible.

Article 3 lit. a of Council Regulation EC 1/2005 requires that all necessary arrangements have been made in advance to minimise the length of the journey and meet the animals’ needs during the journey.

In reality, however, Animals’ Angels documents again and again that 1.) very long journeys often lasting days or even weeks are carried out on a common basis; and 2.) that these long journeys are often unnecessarily prolonged and/or delayed due to lack of proper preparation, poor organisation and/or execution of the transports – always at costs of the animals on board.

On 20 January 2022, during a speech at the European Parliament Plenary on the exchange of views on the recommendations of the ANIT Committee on the protection of animals, Commissioner Stella Kyriakides stressed that “we need to gather knowledge on key issues, such as (...) how long journeys take (...)”.³

This dossier at hand aims to shed a light on this key issue, including the discrepancies Animals’ Angels regularly documents between theoretical scheduled journey times and the actual duration of the journeys. It aims to outline the main reasons for transport delays and prolongations of the journeys which should be substantiated through various case studies and examples “from the road”.

Please note: the list of examples mentioned in this dossier is not exhaustive.

¹ https://www.woah.org/en/what-we-do/standards/codes-and-manuals/terrestrial-code-online-access/?id=169&L=1&htfile=chapitre_aw_land_transpt.htm

² 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, Spooler H, Stahl K, Velarde A, Viltrop A, Winckler C, Earley B, Edwards S, Faucitano L, Marti S, de La Loma 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, p. 6. <https://doi.org/10.2903/j.efsa.2022.7442>

³ https://ec.europa.eu/commission/presscorner/detail/en/speech_22_7952

MAIN REASONS FOR ANIMAL TRANSPORT DELAYS
AND PROLONGATIONS OF JOURNEY TIMES

found during Animals’ Angels investigations
between 2019 and mid-2023

1. Unrealistic short planning of the journey time

All intra-communitarian animal transports exceeding eight hours as well as all transports to non-EU countries, require a journey log which displays in its section 1 the planning of the journey including loading and unloading, watering stops as well as resting and feeding intervals.

Animals’ Angels regularly documents that journey times are indicated too short in the planning, not taking into account, for example, the actual driving speed of a 40t truck, the traffic situation, the road and weather conditions en route, the stops for refuelling, the driver’s breaks and the actual time for watering and feeding the animals on board the trucks as well as the time for loading and unloading the animals.

In the case of export transports to non-EU countries, the times for border crossings (including working hours of the authorities) and customs clearance are often not properly considered and calculated too short, respectively.

Between 2019 and mid-2023, Animals’ Angels found more than 56 transports (including inner-EU transports and exports to non-EU countries) where the journey times were calculated unrealistically short and not matching with the real situation during transport, respectively.

Table 1:
Examples of transports with unrealistically short scheduled journey times,
documented by Animals’ Angels between 2019 and mid-2023:

NO.	TRANSPORT DETAILS	TOTAL DISTANCE ⁴	SCHEDULED JOURNEY TIME ACC. JOURNEY LOG	ACTUAL/REALISTIC TOTAL JOURNEY TIME	DISCREPANCIES/ TRANS-PORT DELAY
1	Two transports of 66 pregnant heifers from Germany to Uzbekistan, 13.–22.02.2019	6,137 km	8 days 13 hours	>9 days	~0.5-1 day of delay Please note: the 24h rest breaks for the animals in Russia and Kazakhstan were not respected – exceeded transport times of >118h.
2	Two transports of 68 pregnant heifers from Germany to Turkmenistan, 18.–at least 28.02.2020	6,014 km	7 days 21 hours (189h)	>10 days	>2 days of delay Please note: the 24h rest breaks for the animals were not respected – exceeded transport times of at least >80.5h.
3	Transport of 20 horses from Spain to Italy, 02.–03.06.2021	2,100 km	48 hours	At least 54h	At least six hours of journey not considered in the planning

NO.	TRANSPORT DETAILS	TOTAL DISTANCE ⁴	SCHEDULED JOURNEY TIME ACC. JOURNEY LOG	ACTUAL/REALISTIC TOTAL JOURNEY TIME	DISCREPANCIES/ TRANS-PORT DELAY
4	Two transports of 66 pregnant heifers from Czech Republic to Turkey, 29.06.–03.07.2022	2,485 km	71 hours	More than 95h	> one day of delay
5	Transport of 49 French ‘feeder’ calves from Cantal (France) to the Canary Islands (Spain), 27.07.–01.08.2022	1,700 km + 2x sea crossings by Ro-Ro ferry	12 hours only	At least 121 hours 40 min (= ca. 5.5 days)	More than 109 hours of journey not considered in the planning
6	Transport of 32 ‘spent’ cows for slaughter from Estonia to Poland, 28.07.2022	1,177 km	17 hours	Reasonably, 1,177 km:70 km/h =17h pure driving + 1h loading and unloading + 1h for watering the animals + driver’s breaks and refuelling + time for milking after max. 12h milking interval → min. 20 hours	At least three hours of journey not considered in the planning + milking interval for the lactating cows on board not considered → leading to the transport of unfit animals.
7	Transport of 70 calves from Romania to Albania, 22.–25.08.2022	1,300 km	7 hours only	Reasonably, 1300 km:70 km/h = 18.5h pure driving + 1h loading and unloading + 1h for watering the animals + drivers breaks and refuelling → min. 22 hours	At least 15 hours not considered in the planning
8	Transport of 602 lambs from Romania to Albania, 24.–25.08.2022	1,455 km	18 hours	Reasonably, 1,455 km:70 km/h = 20h pure driving + 1h loading and unloading + 1h for watering the animals + 1h checks at borders + driver’s break and refuelling → min. 24 hours	Approx. six hours of journey not considered in the planning Animals’ Angels observed the transport on 25.08.22 at 11:36 (UTC+3) in Greece, whereas it was supposed to reach the destination in Albania at 07:30 (CEST+2) of the same day, confirming that the 18h-estimation was not accurate.

2. Poorly prepared and missing transport documents

The transport of animals is a very complex and extremely delicate issue and involves a lot of paperwork and thorough preparation in advance. Unfortunately, many of the business operators are not aware of their responsibilities and show all too often a lack of care when planning, organizing and carrying out these transports – at the expenses of the animals.

Up to the present day, Animals’ Angels documents that long journeys are approved by veterinary services and carried out by transport companies despite poorly prepared or missing transport documents. This includes, inter alia, the lack of preparedness in cases of emergency or in cases of unforeseen events. There is no plan B which can lead to waiting times and transport delays for the animals – sometimes even for days.

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 the importer missed a deadline as the following examples will show.

Example 1:
No preparedness in case of an unforeseen event – road to final destination not accessible

Transport of 34 pregnant heifers from France to the Island of Gran Canaria, 21.–26.09.2022:

IMSOC certificate no.	INTRA.EU.FR.2022.0071944
Transport company	Spanish: Transportes Bonaechea
Departure place	Blain, France (Loire-Atlantique department)
Destination place	El Furel Bajo, s/n, La Aldea de San Nicolás (Las Palmas De Gran Canaria), Spain
Distance to travel ⁵	Ca. 2,500 km
Number of drivers	1
Scheduled journey duration	118 hours (nearly 5 days)
Scheduled arrival at destination	26.09.2022, 14:00 h ⁶
Observed arrival at destination	26.09.2022, 20:25 WEST
Transport delay:	9h 51min (for 60 km)

Transport delay caused to the animals, non-compliance with EU legislation:
The transport was carried out despite the tropical storm ‘Hermine’ hitting the Canary Islands heavily: rough seas on the Atlantic crossing, landslides and blocked road on the Islands, schools closed and flights to the archipelago cancelled.
Due to the tropical storm, the road to the destination on Gran Canaria was flooded and not accessible anymore. The transporter and organizer had no contingency plan for this situation that had already been looming for days. Therefore, the last transport interval after disembarking the ferry took nearly 10 hours for only 60 km. Exhausted and heavily soiled animals with sunken flanks and laboured breathing were observed.

[REDACTED]

⁵ According to google maps
⁶ Time zone not indicated

Example 2:
Lack of required import documents: Turkish buyer did not pay in time
Transport of 30 pregnant heifers from the Czech Republic to Turkey, 30.06.–05.07.2022:

IMSOC certificate no.	INTRA.EU.CZ.2022.0010795 (SVS/2022/086794-C)
Transport company	Hungarian: Mårkus Transporting Kft.
Departure place	Zlúkov (Okres Tábör), CZ
Destination place	Baymıř village, region Aksaray, TR
Distance to travel ⁷	Ca. 2,500 km
Number of drivers	1
Scheduled journey duration	83h (3.5 days)
Scheduled arrival at destination	04.07.2022 at 06:00 ⁸
Observed arrival at destination	05.07.2022 at 12:34 GMT+3
Transport delay:	~ 31h ⁹

Transport delay caused to the animals, non-compliance with EU legislation:
Due to the missing payment of the Turkish buyer, the transport in question was not allowed to leave the Turkish border and was stuck there. It caused a transport delay for the pregnant animals of more than one day.

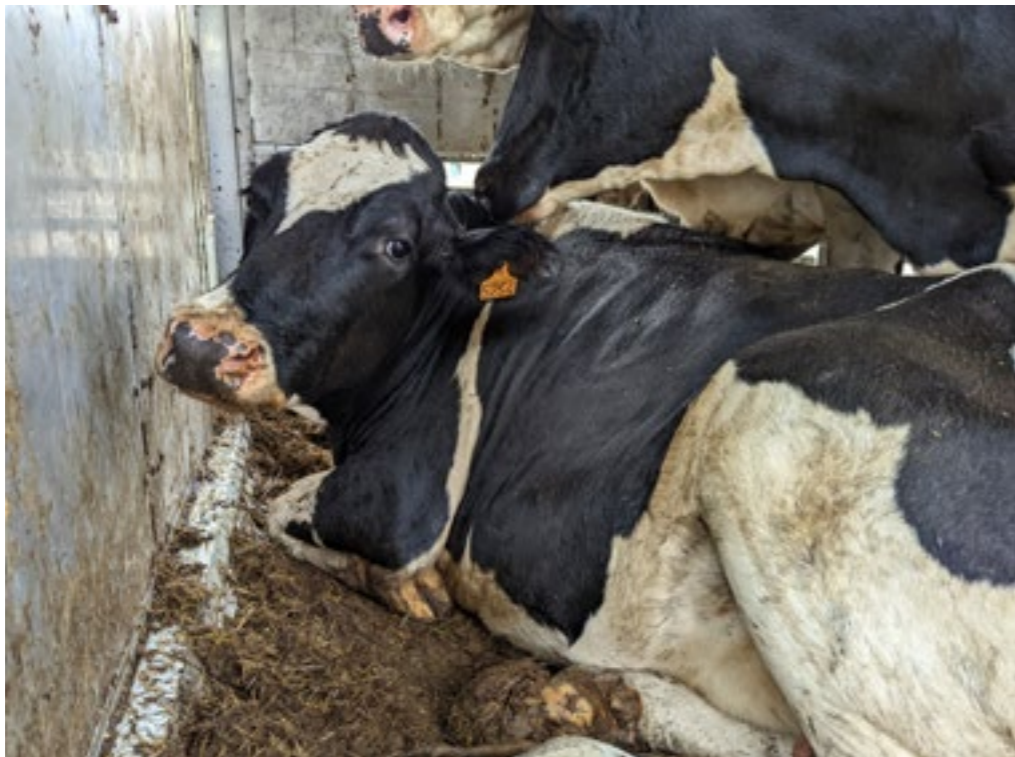
[REDACTED]

Example 3:
Required import document submitted too late by Moroccan buyer
Three transports of pregnant heifers from Germany to Morocco, 19.–25.11.2021:

Animals concerned	102 pregnant heifers (34 animals per truck)
Departure place	VOST Aurich, Lower Saxony, Germany
Destination place	Quarantine stable in the province El Hajeb, Morocco
Distance to travel ¹⁰	> 3,230 km
Number of drivers	unknown
Scheduled journey duration	Ca. 5 days
Scheduled arrival at destination	23.11.2021, exact time unknown
Actual arrival at destination	25.11.2021, 21:15
Transport delay	More than two days
Animals non-stop on board the trucks ¹¹	Between 22.11.2021, ca. 20:10–until 25.11.2021, 21:15 i.e., more than three days (>74h)

Transport delay caused to the animals, non-compliance with EU legislation:
There was a considerable delay in these transports as the trucks got stuck in the port of Tangier, Morocco, for several days – reason for this delay: the Moroccan buyer missed a deadline to apply in time for the authorisation of ONSSA, the Moroccan authority for food safety and animal health, to unload and accommodate the animals in the foreseen quarantine stable. The certificate “Decision d’Approbation du Dossier de Mise en Quarantaine du Betail importe” by ONSSA was therefore missing for animal health reasons because the quarantine stable was disinfected but the necessary waiting period of four days has not yet expired. As consequence, the trucks were stuck at the port of Tangier – with the animals on board.
At the port of Tangier, there are no unloading facilities in case of emergencies or unforeseen events. According to official information, the pregnant animals were confined nonstop on board the trucks for over 74 hours, i.e., more than three days, since their last time of unloading.

⁷ According to Google Maps
⁸ No time zone indicated
⁹ Please see also point 3/ Example of the export route to Turkey, page 13
¹⁰ According to Google Maps
¹¹ Since their last time of unloading for 24h-rest.



Transport of pregnant heifers from France to Gran Canaria - transport delay of nearly 10h. Berenice is extremely exhausted, 26.09.2022.

3. Insufficient numbers of drivers

Often, Animals’ Angels observes transports of animals which are only carried out by one driver, including on (ultra-)long journeys lasting several days or even weeks. Transport companies try to reduce their costs by employing less drivers for one trip, but this often leads to prolonged journey times and delays for the animals.

Regulation EC 1/2005 on the protection of animals during transport and Regulation EC 561/2006 on the harmonisation of certain social legislation relating to road transport are inconsistent and not synchronised to each other as regards the maximum driving hours and rest times for drivers with the allowed transport intervals and resting periods for the animals.

The mismatch between the two EU Regulations concerns i.a. long-distance transports carried out by two drivers and exceeding a journey time of 20 hours and has even more severe consequences when such long journeys are carried out by one driver only. For example, a single driver is only allowed to drive 9 hours (exceptionally 10 hours), with a 45min-break prescribed after 4.5 hours of driving. After completing 9 hours of driving, Regulation EC 561/2006 requires a rest break of 11 hours (9 hours exceptional). On the other hand, Regulation EC 1/2005 allows the transport of pigs and equines for up to 24 hours, and of sheep and cattle for even 29 hours before a 24h rest break is required for the animals at a control post.

In practice, however, Animals’ Angels documents over and over again that long journeys of even several days and thousands of kilometres are carried out with one driver only.

Table 2:
Overview about very long export transports to non-EU countries carried out by an insufficient number of drivers and documented by Animals’ Angels between 2019 and 2022:

TRANSPORT ROUTE	NO. TRANSPORTS WITH INSUFFICIENT NO. DRIVERS	TOTAL JOURNEY TIME	TOTAL DISTANCE	SPECIES AND ORIGIN OF ANIMALS	DELAYS DUE TO INSUFFICIENT NO. DRIVERS	FURTHER REMARKS
Exports to Turkey	34	Up to 5 days	Up to ~3,000 km	Sheep from BG, HU / Bovines from CZ, DE, HU, LV, RO	Up to 7.5h	Investigations carried out: 2x 2020 / 1x 2021 / 1x 2022
Exports to Central Asia	24	~9-10 days	~6,000 km	Bovines from AT, DE, DK, NL	Up to 22h 15min	Investigations carried out: 2x 2019 / 1x 2020 / 1x 2021
Exports to Morocco	11	Up to 5-6 days	Up to 3,200 km	Bovines from DE, ES, FR	Unknown ¹²	Two investigations carried out in 2019

Example of the export route to Central Asia
Two transports of pregnant heifers from Germany to Turkmenistan, 18. to at least 28.02.2020:

IMSOC certificate no.	Transport 1: INTRA.DE.2020.0015118 Transport 2: INTRA.DE.2020.0015119
Animals concerned	68 pregnant Holstein-heifers (34 per truck)
Transport company	Polish: Krajowy I Miedzynarodowy Piotr Klopotek
Departure place	Lauchhammer, Brandenburg, Germany
Destination place	Ashgabat, Turkmenistan
Distance to travel	6,014 km ¹³
Number of drivers	1 driver per truck
Scheduled journey duration	189 h (= 7 days 21 hours)
Scheduled arrival at destination	26.02.2020, at 11:30 UTC+1
Observed arrival at destination	Unknown, on 28.02.2020 at 01:40 UTC+5, the two trucks entered the Uzbek-Turkmen border near Farab/Turkmenabad
Transport delay due to single-driver operation:	At least 22h 15min

Transport delay caused to the animals and observed in Kazakhstan and Uzbekistan:
The journey time was not kept as short as possible due to several reasons and both transports were heavily delayed. However, one of the reasons for the transport delay was the insufficient number of drivers carrying out these ultra-long journeys – examples:

- In Kazakhstan there was a stop in Qulsary of 14.75 hours in which the drivers made their rest break. Instead of granting the animals a 24-hour break outside the trucks and contrary to the indication in the planning of section 1 of the journey log, the heifers were not unloaded but had to remain on board the vehicles for the whole time.
- In Uzbekistan there was another (unscheduled) delay of the transports of more than 7.5 hours – due to another drivers’ rest break. Again, the animals had to remain on board the vehicles for the whole time.

¹² Animals’ Angels observed 10 of these transports only at the port of Algeciras, ES, and thus has no information about transport delays possibly caused by single-driver operation. The eleventh transport was accompanied by Animals’ Angels in the Moroccan part of the journey in May 2019 where the driver drove for six hours non-stop before he stopped for 1h waiting for the buyer of the animals to accompany the truck to the quarantine stable.

¹³ Acc. to Google Maps

Table 3:
Further examples of ultralong-distance-transport observed on the Central Asian route in 2019 while stopping along the way for driver’s rest breaks – with the animals loaded on board the trucks:

TRANSPORT DETAILS TRANSPORT COMPANY	DATE AND TIME (UTC+3) OF STOP	DELAY FOR THE ANIMALS	OBSERVATIONS AND REASON FOR STOP
Three transports of pregnant heifers from DE to AZ, 29.03.2019 – unknown ¹⁴ Megasila (BY) resp. Letax-D (LV)	29.03.2019, 23:16 UTC+2 – 30.03.2019, 08:16 UTC+2	9h	The trucks stopped at a TIR parking near Chromna, PL, for the 9h driver’s rest break – with the animals on board.
Delay for the animals:		9h	Reason: driver’s rest break
[REDACTED]			
Two transports of heifers from DK in direction RU ¹⁵ , February 2019 Danish transport company	16.02.2019, 00:34 UCT+1	unknown	The trucks parked on a TIR parking in Belarus. The curtains of the drivers’ cabins were closed. The drivers were sleeping while the animals had to wait on board.
Delay for the animals:		Likely 9h	Reason: driver’s rest break
[REDACTED]			
Two transports of pregnant heifers from DE to UZ, 13.–22.02.2019 Megasila (BY) resp. Letax-D (LV)	20.02.2019, unknown–08:29 UTC+5	At least 8h	The trucks parked at a TIR parking near Khromtau, Aktobe region, in Kazakhstan. The drivers were sleeping in their cabins. The animals had to wait on board.
	20.02.2019, 23:00 UTC+5 – 21.02.2019, 13:07 UTC+5	14h 07min	The trucks stopped at the TIR parking Kompleks Keruyen, Chagan, Kyzylorda region in Kazakhstan. The drivers did their rest, while the animals had to wait on board.
Delay for animals:		>22h 07min	Reason: driver’s rest break
[REDACTED]			



At minus 10°C, drivers’ break on a TIR parking in Khromtau, Kazakhstan, for at least 8h with the pregnant animals on board, 20.02.2019



The calves are very hungry and show excessive tongue rolling behaviour during a driver’s stop of 2h 15min. Transport of Czech calves to Turkey (reloaded on Turkish vehicle at the Turkish border), 20.08.2021.

¹⁴ Animals’ Angels only observed the transports in Poland; thus time of arrival in Azerbaijan is unknown.
¹⁵ Animals’ Angels only observed the transports in Belarus; no information about the final destination.



Exhausted sheep Mariana during a driver’s break lasting more than 7h. Transport of sheep from Bulgaria to Turkey, 23.08.2021

Example of the export route to Turkey
Transport of 33 pregnant heifers from the Czech Republic to Turkey, 30.06.–04.07.2022:

IMSOC certificate no.	INTRA.EU.CZ.2022.0010794 (SVS/2022/086794-C)
Transport company	Hungarian: Mårkus Transporting Kft.
Departure place	Zlukov (Okres Tábor), CZ
Destination place	Baymıř village, region Aksaray, TR
Distance to travel	~ 2,485 km ¹⁶
Number of drivers	1
Scheduled journey duration	3.5 days (83h)
Scheduled arrival at destination	04.07.2022 at 06:00 ¹⁷
Observed arrival at destination	04.07.2022 at 13:27 GMT+3
Transport delay:	~6.5–7.5h ¹⁸

Transport delay caused to the animals, non-compliance with EU legislation:
The transport from Czech Republic to Turkey was carried out by only one driver. According to Google Maps the total distance of the journey was 2,485 km. This corresponds to a net driving time (without border controls) of 35.5h. The transport leg in the EU¹⁹ itself amounted to 1,652 km²⁰. The social regulation for drivers foresees a mandatory rest for single-driver operation after 9 and exceptionally 10 hours of a minimum of 9 hours. These resting times were not foreseen in the planning, neither was a driver-change indicated in the journey log. Therefore, it is to be feared either that the driver times were already exceeded by far in the first transport interval or that the transport was extended considerably for the animals, which would violate the general transport requirements.
For the transport leg in Turkey, the transport needed nearly 17h for a distance of 909 km.²¹ Calculating with 70 km/h, the pure driving time for such distance would amount to approx. 13h. **Accordingly, in the journey leg in Turkey the journey times for the animals were extended due to mal-organization by using only one driver as well as the resting times for the driver were not respected and the permitted driving time was exceeded putting at risk the driver himself, the animals, and the road safety.**

Please note:
Two other transports (INTRA.EU.CZ.2022.0010795 and INTRA.EU.CZ.2022.0010796) were carried out by the same transport company on the same route from CZ to TR at more or less the same dates and time – again, both transports were carried out with only one driver each. One of these transports had a much bigger delay – not only due to single-driver operation but also due to missing documents/missing payment (see point 2, example 2).

¹⁶ Acc. to Google Maps
¹⁷ No time zone indicated in the journey log, section 1.
¹⁸ Depending on time zone which is not indicated in section 1 of the journey log.
¹⁹ Until control post in Svilengrad (BG)
²⁰ Acc. to Google Maps
²¹ Please note: Animals’ Angels did not accompany the truck during the whole leg in Turkey but followed from the height of Izmit until final destination. The truck needed around 9h to drive from the BG-TR border to Izmit (distance of ca. 350 km, pure driving time with 70 km/h = ca. 5h). I.e. at this point, when starting to follow the truck, it had already a delay of ca. 4h.

Table 4:

Further examples of long distance-transporters observed in Turkey in 2021 while stopping along the route for driver's rest breaks due to one-driver operation – with the animals still loaded on board the vehicles:

TRANSPORT DETAILS TRANSPORT COMPANY	DATE AND TIME (UTC+3) OF STOP	DELAY FOR THE ANIMALS	OBSERVATIONS AND REASON FOR STOP
Heavy bull calves from CZ to TR, INTRA.CZ.2021.0026378 ²² Gran-BG Ltd., BG → for EU leg of journey / In Kapikule, at the Turkish border, the animals were reloaded on a Turkish truck.	19.08.2021, 18:30–19:00	30min	Stop at parking/restaurant 'Hamitabat Park Alani Güney' on E80. Coord. 41.478518, 27.278451. Driver's break.
	20.08.2021, 02:30–04:00	1h 30min	Stop at parking Kocalar tesis, coord. 40.240069, 32.506038. Driver's break.
	20.08.2021, 06:15–08:30	2h 15min	Stop in Keskin, at coord. 39.662960, 33.614423. Driver's break.
Delay for animals during Turkish transport part:		4h 15min	Reason: one-driver operation
Heavy bull calves from CZ to TR, INTRA. CZ.2021.0026595 Märkus Transporting Kft., HU	21.08.2021, 21:12–22:07	55min	Stop at service station 'Istanbul Park' on highway 07. Driver's break.
	22.08.2021, 02:54–06:30	3h 36min	Stop at a parking lot entering the town of Karabük (TR). Driver's break.
Delay for animals during Turkish transport part:		4h 31min	Reason: one-driver operation
Sheep (likely for slaughter) from BG to TR, INTRA.BG.2021.0004064-V1 PIMK, BG	23.08.2021, 03:24–10:45	7h 21min	Stop at a small parking next to toll station on highway 04 at coord. 40.117574, 32.604235. Driver's break.
Delay for animals during Turkish transport part:		7h 21min	Reason: one-driver operation

Please see also the appendix concerning a German court decision on this issue.

²² According to information received at the Turkish border, the transport consisted of two consignments of animals.
The INTRA-number indicated here presents one consignment of 32 animals. Animals' Angels does not have information
about the remaining 28 animals and if e.g. the INTRA-number and the loading place of the animals differ from the first one.

4. Ferry schedules and waiting times at ports not properly calculated

Concerning the transport by roll-on-roll-off ferries, Animals' Angels regularly documents prolonged waiting times at the ports of departure and transport delays due to mal-coordination of the organizer and transporter. For example, the transports regularly arrive too early at the ports of departure and thus have to wait for many hours – with the animals on board the trucks – before being allowed to embark the ferry.

Also, weather forecasts and delays in the departure schedule of the ferries are often not properly checked in advance which can lead to even more severe transport delays for the animals.



Transport of Spanish calves from Spain (Aragón) to Gran Canaria, 07.–10.10.2022. The transport had more than 12h delay with sick calf Magda on board (left). She was unable to stand up upon arrival to the destination suffering from severe breathing difficulties, exhaustion and possibly shipping fever.

Examples of the transport route to the Canary Islands

Prolongation of transports due to early arrival and long waiting times at the port of Cádiz, Spain, concerning Ro-Ro transports observed by Animals’ Angels in 2022 and June 2023:

NO.	TRANSPORT DETAILS TRANSPORT COMPANY	TRANSPORT ROUTE AND DATE	WAITING TIME AT PORT BEFORE EMBARKATION	TRANSPORT DELAY ²³
1	Transport of 76 French and Irish ‘feeder’ cattle Montalban (ES)	From Catalonia (ES) to the Island of Tenerife (ES), 22.–25.07.2022	Arrival at port of departure: 23.07.2022, 04:05 CEST Embarkation on ferry: 23.07.2022, 08:38 CEST	2h 33min
2	Transport of 50 French ‘feeder’ cattle Transportes Sanguinhedo LDA (PT)	From Aragón (ES) to the Island of Gran Canaria (ES), 05.–08.08.2022	Arrival at port of departure: 05.08.2022, 20:00 CEST Embarkation on ferry: 06.08.2022, 08:21 CEST	10h 21min
3	Transport of 34 pregnant French heifers INTRA.EU.FR.2022.0071944 Transportes Bonaechea (ES)	From France to the Island of Gran Canaria (ES), 21.–26.09.2022	Arrival at port of departure: 23.09.2022, 18:33 CEST Embarkation on ferry: 24.09.2022, 08:37 CEST	12h 4min
4	Transport of 69 Spanish ‘feeder’ cattle Hns. Bazan S.L. (ES)	From Extremadura (ES) to the Island of Tenerife (ES), 30.09.–03.10.2022	Arrival at port of departure: 30.09.2022, 20:46 CEST Embarkation on ferry: 01.10.2022, 09:06 CEST	10h 20min
5	Transport of 80 ‘feeder’ calves with Spanish, French and Belgium origin Euroboscan S.L. (ES)	From Aragón (ES) to the Island of Tenerife (ES), 07.–10.10.2022	Arrival at port of departure: 07.10.2022, 20:45 CEST Embarkation on ferry: 08.10.2022, 08:38 CEST	9h 53min
6	Transport of 111 Spanish ‘feeder’ calves Portuguese transporter	From Aragón (ES) to the Island of Gran Canaria (ES), 07.–10.10.2022	Arrival at port of departure: 07.10.2022, 18:30 CEST Embarkation on ferry: 08.10.2022, 08:31 CEST	>12h
7	Transport of 73 Spanish ‘feeder’ calves, Spanish Transporter José Ruiz	From Andalusia (ES) to the Island of Tenerife (ES), 23.–26.06.2023	Arrival at port of departure: 23.06.2023, 23:00 CEST, Embarkation on ferry: 24.06.2022, 8:00 CEST	7 hours

²³ Two hours were deducted from the total waiting time at the port, as usually for ferry check-in and related operations a time frame of two hours is considered adequate. See: Hirt, Maisack, Moritz, Tierschutzgesetz, 3rd Edition, EU Animal Transport Regulation Annex I Chapter V marginal number 10

Examples of the export route to Morocco

List of transports observed in the port of Algeciras, Spain, despite the cancellation of the Ro-Ro ferry traffic due to bad weather conditions in March 2019²⁴:

NO.	TRANSPORT DETAILS TRANSPORT COMPANY	TRANSPORT ROUTE AND DATE ²⁵	OBSERVED WAITING TIME AT PORT BEFORE LEAVING AGAIN	TRANSPORT DELAY IN TOTAL
1	Transport of 47 Spanish ‘feeder’ calves Spanish transporter	From Lérida, Spain to Beni Mellal, Morocco	26.03.2019, from at least 07:39am until at least 14:31 → driving back to control post in Alicante (641km far), arriving there on 27.03.2019 at 01:09am	4 days of delay Reason: ferry traffic cancelled due to bad weather conditions.
2	Transport of 70 Portuguese ‘feeder’ calves Spanish transporter	From Portugal to Agadir, Morocco	26.03.2019, from at least 08:00am until at least 14:31 → apparently driving back to place of departure, no further information	
3	Transport of ca. 70 Portuguese ‘feeder’ calves Grupo Logístico Sorroche (ES)	From Portugal to Agadir, Morocco	26.03.2019, from at least 07:51am until at least 14:31 → apparently driving back to place of departure, no further information	
4	Transport of 69 Portuguese ‘feeder’ calves Spanish transporter	From Portugal to Casablanca, Morocco	26.03.2019, from at least 07:38am until at least 14:31 → apparently driving back to place of departure, no further information	
5	Transport of 79 Portuguese ‘feeder’ calves Spanish transporter	From Portugal to Agadir, Morocco	26.03.2019, from at least 07:38am until at least 14:31 → apparently driving back to place of departure, no further information	
6	Transport of 70 ‘feeder calves El Doctor Transportes (ES)	From Lérida, Spain to Casablanca, Morocco	26.03.2019, from at least 08:04am until 14:31 → driving back to control post in Alicante (641km far), arrival time at control post unknown	
7	Transport of 70 ‘feeder calves Transportes Juanin (ES)	From Lérida, Spain to Morocco	26.03.2019, from at least 08:09am until at least 14:31 → no further information	>12h animals on board the truck
8	Transport of 66 Spanish ‘feeder’ calves Transportes Cristóbal (ES)	From Lérida, Spain to Casablanca, Morocco	26.03.2019, from at least 08:30am ²⁶ until 14:31 → driving back to control post in Alicante (641km far), arriving there at 26.03.2019 at 22:10pm	
9	Transport of pregnant heifers H. Artmann (DE)	From Austria to Morocco	29.03.2019, from around 12:00pm until 30.03.2019, 00:15am	
10	Transport of pregnant heifers Diekmann (DE)	From Austria to Morocco	29.03.2019, from around 12:00pm until 30.03.2019, 00:15am	

²⁴ Due to bad weather conditions, the ferry traffic to Morocco was stopped from 26. until 30.03.2019. According to the information received, the concerned transport companies were informed about the situation by email by the BCP Algeciras on 25.03.2019 at 00:00am. Nevertheless, at least eight transports arrived at the port of Algeciras in the night/early morning of 26.04.2019 as well as two further transports on 29.04.2019 which caused additional long waiting times and transport delays for the animals.

²⁵ According to driver

²⁶ According to driver, waiting at port from 04:00am



5. 'Assembly centre hopping'

According to Article 2 (r) of Council Regulation EC 1/2005 a 'place of departure' is defined as a place where the animals have been accommodated for at least 48 hours before they are loaded from there onto a transport vehicle. However, the Regulation makes an exemption for so-called assembly centres, i.e. places such as holdings, collection centres and markets at which 'farm' animals of different origins are grouped together to form a new consignment. In this specific case, an assembly centre can be considered as a place of departure if 1.) the transport distance between the first place of loading and the assembly centre is less than 100 km; or 2.) the animals have been unloaded, rested and provided with water and food for at least six hours at the assembly centre prior to their further transport.²⁷

In practice, Animals' Angels regularly documents that this exemption is used to disguise the real journey time of the animals by dividing one long transport into two separate ones. I.e., in the first transport phase the animals are transported from the departure place to the assembly centre which is indicated in the accompanying transport documents as place of destination. There, the animals are unloaded and rested for min. six hours and then re-loaded again, often on the same vehicle in the same group of animals – with new documents for national transports.²⁸ Alternatively, a small number of animals is added or exchanged to formally create a new consignment, but the animals are reloaded onto the same transport vehicle without prior cleaning and disinfection.

The reason for this illegal practice is to circumvent the mandatory 24h rest for the animals after reaching the maximum allowed journey time.

Examples of 'assembly centre hopping' via an Italian assembly centre (number 054RM014): Already in 2016, Animals' Angels had documented and reported the practice of so-called 'assembly centre hopping' at this Italian assembly centre in a case of pigs who were transported from Spain to Italy for slaughter.²⁹

In 2019, 2020, 2021 and 2022, Animals' Angels documented that the same illegal practice continues at this place.

²⁷ Article 2 letter r paragraphs i) and ii) of Council Regulation EC 1/2005
²⁸ First and second transport phase can also change in order, i.e. first the animals are transported on national transports within a country to the assembly centre and then from there they start the long journey with new documents.
²⁹

Table 5:
Cases of 'assembly centre hopping' at the Italian assembly centre, documented by Animals' Angels between 2019 and 2022:

NO.	TRANSPORT DETAILS	TIME STOPPED AT ASSEMBLY CENTRE	NEW CONSIGNMENT OF ANIMALS FORMED AT ASSEMBLY CENTRE?	REMARKS
1	Long transport of 50 heavy bulls from Spain to Italy via assembly centre, 18.–20.07.2019	Only 9h	No. Same animals transported further on 2nd inner-Italian transport in the same vehicle	Long-distance transport from ES to IT only planned until assembly centre. 2nd Inner-Italian transport with Italian transport documents "modello 4"
2	Long transport of pigs from Spain to Italy via assembly centre, 19.–21.07.2019	Only ~10.5h	Likely same consignment of pigs transported further on 2nd inner-Italian transport in the same vehicle	-
3	Long transport of horses and cattle from Spain to Italy via assembly centre, 17.–18.07.2020	<16h	No. Same animals transported further on 2nd inner-Italian transport in the same vehicle	-
4	Long transport of French and Spanish cattle from Spain to Italy via assembly centre, 17.–18.07.2020	Only 9.5h	Likely same consignment of animals transported further on 2nd inner-Italian transport in the same vehicle	-
5	Long transport of cattle and lambs from Spain to Italy via assembly centre, 28.–30.01.2021	unknown	No. Same cattle and likely same lambs transported further on 2nd inner-Italian transport, likely in the same vehicle	Long-distance transport from ES to IT only planned until assembly centre. 2nd Inner-Italian transport with Italian transport documents "modello 4"
6	Long transport of horses and cattle from Spain to Italy via assembly centre, 28.–30.01.2021	Ca. 18h	No. Same cattle and horses transported further on 2nd inner-Italian transport in the same vehicle	Long-distance transport from ES to IT only planned until assembly centre. 2nd Inner-Italian transport with Italian transport documents "modello 4"
7	Long transport of heavy bulls from Spain to Italy via assembly centre, 21.–23.05.2022	13h 41min	No. Same animals transported further on 2nd inner-Italian transport in same vehicle	Long-distance transport from ES to IT only planned until assembly centre. 2nd Inner-Italian transport with Italian transport documents "modello 4"
8	Long transport of cattle from Hungary to Italy via assembly centre, 26.–27.10.2022	Only 9h	No. Same animals transported further on 2nd inner-Italian transport in same vehicle	Long-distance transport from ES to IT only planned until assembly centre. 2nd Inner-Italian transport with Italian transport documents "modello 4"

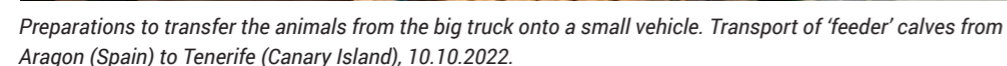
7. Destination places not accessible by transport vehicles

On repeated occasions, Animals' Angels has documented that the final destination places of the animals are not accessible by the transport vehicles originally used for the journey. I.e., the normal 40t trucks are too big for the small access roads to the farms so that the animals have to be transferred (reloaded) on smaller trucks at a certain point of the journey.

As practice shows, these transfers and reloading events are often not considered in the planning and thus the extra time needed to transfer the animals from the big truck onto the smaller trucks are not properly calculated – although this can significantly increase the total journey time of the animals.

Table 6:

(b) (5) DPP, (b) (7)(C)



8. Misleading destination places indicated in the transport documents

In the case of exports to non-EU countries, Animals’ Angels has repeatedly documented that the destination places of the animals were wrongly indicated in the journey log. Thus, the actual destination, which is much further away than the one indicated in the transport documents, is disguised in order to make the journey shorter, at least on paper - in reality, of course, the transports then take much longer than theoretically foreseen in the accompanying documents.

For example, in March 2020, Animals’ Angels observed a transport of bull calves from Hungary to Turkey carried out by the Hungarian transport company Zipa Trans – according to the accompanying documents, the destination of the animals was in Istanbul. However, the Animals’ Angels team found on-site that the transport did not stop in Istanbul but went on further south. According to the information given by the drivers the **real destination was a farm near Aksaray which is 650 km far from the destination indicated in the documents.**

■ [REDACTED]
[REDACTED]

In August 2021, Animals’ Angels again documented on the export route to Turkey another transport with wrong destination indicated in the accompanying documents: sheep (probably for slaughter) were transported by the Bulgarian transport company Pimk from Bulgaria to Turkey. **Edirne was indicated as final destination** in the journey log and TRACES documents. The Animals’ Angels team on-site accompanied the transport in the non-EU leg of the journey. **In reality, the transport did not stop in Edirne but continued for more than >850 km in direction Aksaray.** I.e. the transport part in Turkey was completely missing in the documents – the organizer and transporter did not indicate it in the planning (section 1) nor in the transporter’s declaration (section 4) but told the untruth. **The animals were actually transported for more than 27h (vs. section 1) and more than 18h (vs. section 4) than indicated in the journey log.**

■ [REDACTED]
[REDACTED]

By indicating a misleading destination, the organizers evade any realistic check by the competent authorities. I.e., it is impossible to carry out a proper plausibility check.

CONCLUSIONS

Accurate and precise planning is crucial to avoid transport delays and prolongations of journey times for the animals on board the trucks. I.e., to avoid the risk of unnecessary and additional animal suffering and increased stress in the transported animals.

However, as this dossier at hand shows, reality paints a very different, alarming picture.

All too often, the real journey times of animal transports do not match the theoretical ones because either they are simply calculated too short, or the transport documents are poorly prepared or even missing which in turn leads to transport delays along the route.

In addition, transports are often so poorly organized that e.g., the required number of drivers is not taken into account, the additional travelling time is not calculated when the animals are loaded or unloaded at different farms or when the animals have to be transferred onto smaller vehicles in order to reach the final destination. For Ro-Ro transports, ferry schedules are often not properly respected, resulting in prolonged waiting times for the animals on board the trucks in the ports.

In some cases, the real destination places of the animals are even deliberately disguised in order to make the transports appear shorter and thus circumvent the required 24h rest break for the animals, as in the case of so-called ‘assembly centre hopping’ or in the case of export transports to non-EU countries when the destination places are wrongly indicated in the transport documents. This simply makes a thorough plausibility check impossible for the authorities.

These are not only isolated exceptional cases, but unfortunately transport delays and prolongations of journey times occur much more frequently.

As practice shows, Article 3 lit. a of Council Regulation EC 1/2005, which requires that all necessary arrangements must be made in advance of a journey to minimise its length, is all too often not taken into account, or only inadequately.

It is time to act!

The issue of transport delays and prolongations of journey times has to be addressed in the revision of Council Regulation EC 1/2005.

Therefore, Animals' Angels calls, among others, for:

- an absolute journey time limit of eight hours, as this would, among others, mitigate several risk factors related to transport delays and prolongations of journey times, and thus reduce immense and unnecessary suffering of the animals;
- a definition of a realistic average speed for animal transports carried out by road transport vehicles;
- an adjustment of the maximum allowed journey times of animals to the drivers' hours according to the social legislation relating to road transport;
- a prohibition of 'assembly centre hopping' and in this context the deletion of the exemption concerning the 6h rest at assembly centres according to article 2 lit. r.
- a prohibition of multiple pick-ups and unloading events leading to prolongations of the journey time for the animals.

In the case of export transports to non-EU countries, Animals' Angels is of the firm opinion that the only solution is an EU-wide export ban to countries without animal welfare guarantees as it is simply impossible for the EU authorities to control and, if necessary, intervene during the transport part outside the EU.



Decision 6 A 223/21 of the Administrative Court of Osnabrück, Lower Saxony, Germany, of 11th October 2021

The case: Four transports of 448 heifers from Germany to Morocco were planned by the organizer to be carried out with only one driver per truck. The total journey time was calculated with five days and six hours.

According to the planning, the organizer scheduled two 24h stops in the control posts of Sète, France, and Alicante, Spain. Additionally, the organizer planned two further stops of 9.5 hours – each on the road which obviously would be used by the drivers for their obligatory rest breaks. The organizer explained this decision primarily for animal welfare reasons as the animals are supposed to be fed and watered and to rest of at least six hours afterwards. Also, the organizer argued that the animals would have sufficient space to conduct resting behaviour on board the trucks.

The competent veterinary service, also by order of the Ministry of Lower Saxony, refused the approval of these four transports due to the single-driver operation.

The case went to court as the organizer did not want to accept the decision of the veterinary service.

Court decision: The Administrative Court of Osnabrück dismissed the case.

Argumentation of the Court: The Administrative Court of Osnabrück argued, inter alia, that – while long journeys can be expected to have a more detrimental effect on the welfare of the animals transported than short ones – the overall purpose of Council Regulation EC 1/2005 is to minimise the transport stresses for the animals which are inevitably associated with any transport. This can be achieved primarily by keeping the total journey time from the place of departure to the place of destination as short as possible.³⁰

In the opinion of the Chamber, **the planning of such a long journey with only one driver as submitted by the organizer is not in line with the principle of Council Regulation EC 1/2005 of keeping the transport as short as possible in the interest of the welfare of the animals ("acceleration requirement"). The 9.5 hours rest breaks, which could be significantly shortened by using a second driver, contradict this principle.**

The "acceleration requirement" and "the prohibition of delays" – and thus ultimately the requirement to prevent unnecessary suffering of the animals – would be taken into account to a much greater extent by the use of a second driver than if the transports were carried out with only one driver.³¹

Therefore, the Court ruled in favour of the veterinary service's decision to not approve these transports and not least in favour of the animals who were thus spared unnecessary waiting times on board the trucks.

³⁰ Administrative Court of Osnabrück, decision 6 A 223/21 of 11th October 2021. See point 2.a., p. 10

³¹ Ibid. See point 2. b., p. 11



ANIMALS' ANGELS

we are there with the animals

