

Export of live animals to non-EU countries
without animal welfare guarantees –
time to take responsibility according
to Article 13 TFEU.

A dossier by Animals' Angels



Dedication



This dossier is dedicated to Sarah.

She was exported from Germany to Morocco in 2018.
We don't know what her life was like in Morocco until the day we found her at a local market in Morocco in March 2023. But we remember the sad sight of her, alone, with her legs tied together, at the mercy of the chaos of the market. Her look is burned deep into our hearts.

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Note: Animals' Angels expressly takes a stand against any form of discrimination and hostility against people of other cultures or religions. A lack of animal welfare is an international problem - not just that of individual countries.

Therefore, we work internationally for better animal protection, compassion and respect for the animals. Our work is based on respectful dialogue and communication across cultural boundaries with all stakeholders involved.

Cover picture: Typical loading of cows at Moroccan markets.
Picture taken at the market in Sidi Bennour, March 2023.

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'Dairy' cow Alia in poor condition: she is emaciated, has deeply sunken flanks and is very dirty. Sold at the market in Sidi Bennour, 14.03.2023

Background

Since decades, the Member States of the European Union (EU) export live 'farm' animals to countries outside the Union's territory. Between 2017 and 2021, the EU exported over 5 million cattle and over 14 million small ruminants to non-EU countries.¹

The main importing countries of European 'farm' animals are in Northern Africa, the Middle East and Central Asia. Most of these non-EU countries do not have adopted any national animal welfare legislation, especially when it comes to the housing, management, transport and slaughter of 'farm' animals.² For example, the Animal Protection Index (API) concerning the indicator 'protecting animals used in farming' is ranked with G (worst position in the ranking scale A - G) for countries like Morocco, Egypt, Algeria or Russia.³

Also, the internationally agreed animal welfare standards of the World Organization for Animal Health (WOAH, formerly OIE) are not met in most of these importing countries.⁴ Even though, all importing non-EU countries of European 'farm' animals are WOAH members and thus, have committed themselves to comply with the international animal welfare standards set by the WOAH.

Regardless this fact, the EU continues sending live animals to these countries in great numbers. According to Eurostat, in the year 2022 over 101,987 cattle were exported from the EU to Algeria, 29,214 to Morocco, 55,796 to Egypt and 30,821 bovine animals to Russia, for example.⁵

Article 13 TFEU⁶

"In formulating and implementing the Union's agriculture, fisheries, transport, internal market, research and technological development and space policies, the Union and the Member States shall, since animals are sentient beings, pay full regard to the welfare requirements of animals (...)."

Article 13 as a cross-sectional clause is enshrined in Part One Title II of the TFEU (and thus into European primary law) since 2009. Accordingly, Article 13 TFEU reflects a guiding principle of the Union's policy.

As stated by Guretzki (2021) the European Court of Justice proves that this principle according to Article 13 TFEU, namely, to pay full regard to the welfare requirements of animals as they are sentient beings, is not merely of programmatic nature when consistently highlighting the matter as a "legitimate objective in the public interest".⁷

The export of live animals to non-EU countries without animal welfare guarantees, however, contradicts this self-conception and the core principle of Article 13 TFEU.

¹ European Court of Auditors, Review: Transport of live animals in the EU: challenges and opportunities. Interactive Dashboard Annex, April 2023

<https://app.powerbi.com/view?e=eyJrJoiZGM0N2RkN2UtmY4Ni00YTUxLTkxMDMtMDNiMDY5ZjVjNDA4liwidCI6Ijg4MDE3N-DEzLT11NDktNDI2Ni1hYjYwLTg5NDZmZmFNDG00SIsImMiOiJ9&pageName=ReportSection0eb75ca58b48d6b47fec>

² For further information, please see: <https://www.globalanimallaw.org/database/national/index.html> and <https://api.worldanimalprotection.org/> (last accessed 05.05.2023).

³ For other countries, like e.g. in the gulf region, there does not even exist an Animal Protection Index.

⁴ For country details, see: <https://api.worldanimalprotection.org/indicators>. E.g. Morocco is ranking on worst position G since the existing national legislation does not incorporate any of the WOAH's guiding principles for animal welfare.

⁵ Data extracted from Eurostat. <https://ec.europa.eu/eurostat/comext/newxtweb/> (last accessed 28.07.2023).

⁶ TFEU = Treaty on the Functioning of the European Union

⁷ Guretzki, Torben (2021) „Kuh-Tourismus“ auf Abwegen. Die Ausfuhr lebender Tiere aus der EU in Drittstaaten und die Möglichkeiten, diese aus Gründen ihres Schutzes einzuschränken, EuZW, edition 23/2021, p. 1026

Case study Morocco

Animals’ Angels carried out an intensive field study on European ‘dairy’ cows sold and slaughtered at local markets in Morocco between 2019 and 2020: www.animals-angels.de/eu-cows-morocco

The conditions at the markets and their adjacent slaughterhouses are extremely poor and animal welfare does not play any role up to date.

Back then in 2019 and 2020, we documented more than 43 cattle from the EU, among them 37 ‘dairy’ cows, at three local Moroccan markets. The cows originally came from mainly France and Germany, but also cows with Dutch and Austrian ear tags were found. Six ‘slaughter’ bulls were observed with Spanish ear tags.

In March 2022, we documented again more than 22 ‘dairy’ cows with European ear tags (mainly from France and Germany and one cow from the Netherlands) as well as two Spanish bulls for slaughter at these local markets.

Same severe animal welfare problems found in March 2023:

In March 2023, Animals’ Angels went back to these local markets and adjacent slaughterhouses. Once more, we observed the same severe animal welfare problems like in the years before – and once more, we documented 26 European ‘dairy’ cows there, mainly from France and Germany – and one cow from Austria. These animals with EU origin were handled, transported and slaughtered without any animal welfare standards and under conditions that clearly contradict EU animal protection legislation and even would be classified as animal cruelty by EU law.

1. Observations at the slaughterhouse of the Mers El Kher market, 18.03.2023

Example 1: Cow Hedwig from Germany

Ear tag no.	DE 03 591 15345
MS of origin	Germany (Lower Saxony)
Date and place of birth	06.05.2017, born in 29365 Sprakensehl, Lower Saxony
History	21.02.2018 transported from farm of origin to second farm in 29320 Hermannsburg, Lower Saxony / 21.01.2019 transported from second farm to an assembly centre of Masterrind GmbH in 29525 Uelzen, Lower Saxony / 21.01.2019 on the same day, transported from there to assembly centre Peitzmann in 48480 Lünne, Lower Saxony – from there exported.
Export to Morocco	04.02.2019
Animals’ Angels observations:	
Location where found	Slaughterhouse of the Mers El Kher market
Date and time	18.03.2023, 05:36 – 05:58 am
Purpose at market	Slaughtered. Please note: it is still dark outside and the slaughterhouse only is equipped with scarce light inside.
Observations	Holstein-Frisian breed, black-white, BCS ~2, still in lactation. We see Hedwig for the first time in front of the principal door of the selling area. Two men are driving her in direction to the slaughterhouse. Once inside they tied her to a pillar next to a young bull. While the worker is tying Hedwig, other workers are busy killing the young bull just in front of her. Hedwig has to wait in front of the dead body of the young bull for at least 20 min. Her ears are moving constantly and sometimes, her eyes are wide-open. She is salivating a lot.

Observations

Then, a worker approaches and ties her left front legs with a rope attached to the ceiling, while another worker ties her right hind leg with a rope attached to the ceiling as well. Then, the workers pull strongly at the ropes. Hedwig falls heavily on the ground and immediately tries to move and stand up. She hits constantly her head on the ground and tries to move and kick with her legs. The workers approach and put themselves on Hedwig’s body and put all her legs together. Then, the butcher stretches and twists Hedwig’s neck and cuts her throat while she is fully conscious. The cut goes down and up, and down and up. Hedwig tries to kick and move but she is still tied.



Hedwig has to wait inside the slaughterhouse while other cattle are killed in front of her.



Cow Hedwig waiting next to the dead body of a bull being killed in front of her.



Hedwig after falling on the ground – she tries to stand up, but her legs are tied. In front of her is still the dead bull.

Example 2: Cow Nadina from France

Ear tag no.	FR ear tag, ending with 8444
MS of origin	France
Animals' Angels observations:	
Location where found	Slaughterhouse of the Mers El Kher market
Date and time	18.03.2023, 05:05 – 05:30 am
Purpose at market	Slaughtered. Please note: it is still dark outside and the slaughterhouse only is equipped with scarce light inside.
Observations	<p>Likely Montbeliard breed, BCS ~3.5. With recent injury on her belly.</p> <p>Nadina cannot see when she is brought to the right side of the slaughterhouse. She is blindfolded with a plastic cloth around her eyes. Her ears are moving constantly.</p> <p>One of the workers, immediately, ties together both of her front legs and then her left hint leg with a rope. The rope is attached to a metal bar at the ceiling.</p> <p>The worker, with the help of another man, pulls the rope so that Nadina falls heavily on her side onto the ground. She tries to stand up repeatedly but without success. She hits her head several times on the ground. While trying to escape and striking with her legs in the air, Nadina hits a wooden ladder that falls on her head and body.</p> <p>One of the workers tries to grab her head to stretch her neck for the cutting. Nadina resists and hits the ground with her head, so that the worker falls on the ground. Only with the 'help' of another worker, they manage to stretch and twist Nadina's neck.</p> <p>At 05:16 am, the butcher cuts Nadina's throat with two cuts (down and up), while she is at full consciousness.</p>

Observations	<p>A few seconds later, Nadina starts to kick and move while bleeding. She is still tied by her legs and blindfolded.</p> <p>1 min after cutting her throat, she still attempts to breath. A worker approaches her and does another cut to her throat. Her body immediately reacts and twitches, and her tail starts slapping on the ground. Breathing attempts are still visible after 2 min of cutting her throat.</p> <p>At 05:20 am – 4 min after cutting her throat – the butcher approaches and steps with his foot onto her head to cut her neck a third time.</p> <p>Around 05:28 am, Nadina is not moving anymore. The workers start to skin her.</p>
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Nadina trying to stand up with her legs tied and blindfolded.



A ladder falls onto Nadina after she kicked it with her legs while trying to escape the situation.

To be continued page 10



Two workers try to stretch and twist her neck.



After 2 min of cutting Nadina's neck, she is still trying to breath. A worker does another cut.

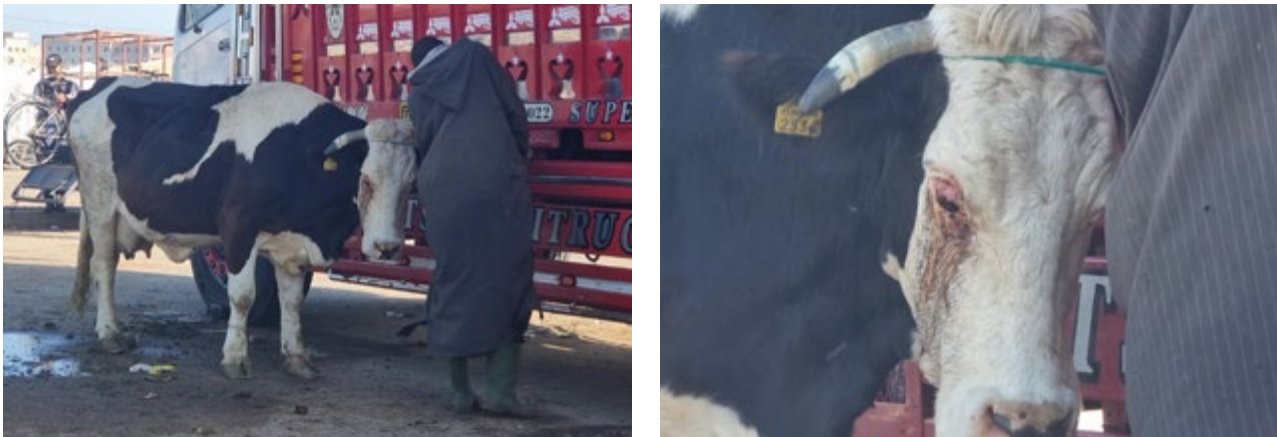
Observations at Sidi Bennour market, 14.03.2023

Time of market check	05:30 am – ca. 12:40 pm	
Number of bovines (estimated)	Around 2,000 bovines are sold: <ul style="list-style-type: none">• ‘dairy’ cows• ‘spent’ cows for slaughter• bulls and calves for fattening / slaughter• female calves for breeding and milk production• unweaned calves	
Origin of bovines	<ul style="list-style-type: none">• Most of the animals with Moroccan ear tags or without any ear tags.• Many cows of Rotbunte, Holstein and Montbeliard breeds are sold at the market.• A total of 15 ‘dairy’ cows with EU ear tags documented: 1 x Austria, 5 x Germany, 9 x France.	
List of ‘dairy’/‘spent’ cows observed at Sidi Bennour market	<ul style="list-style-type: none">• FR x0 3074 6178• FR 72 6118 1517• FR 71 2041 6027• FR 67 7134 5181• FR 35 2526 0203• FR 25 3889 3261• FR 25 3772 2984• FR 25 2604 5421	<ul style="list-style-type: none">• FR 01 1902 0580• DE 05 392 50850• DE 03 595 48684• DE 03 587 05450• DE 03 x94 63330• DE xx xxx 35946• AT 84 2949 929

General impression of the Sidi Bennour market, March 2023:



General impression of the market area of Sidi Bennour.



Cow with a Moroccan ear tag and severe inflammation of her right eye. No veterinary treatment granted to her.



Left: baby calf muzzled (common practice at the market). Right: three cows are tied very shortly to the ground so that they cannot move their head properly (common practice at the market).



Left: Cows tied with very thin ropes including by their horns. They have no space to move. Right: Example of emaciated and dirty 'dairy' cow sold at the market of Sidi Bennour.



Left: Brutal loading of a cow onto a truck with very steep ramp and low second deck. / Right: cows loaded on second deck of a truck (without roof, without loading ramp).

Examples of 'dairy' cows with EU ear tags sold at Sidi Bennour market, March 2023:

Example 1: Cow Ivette from France

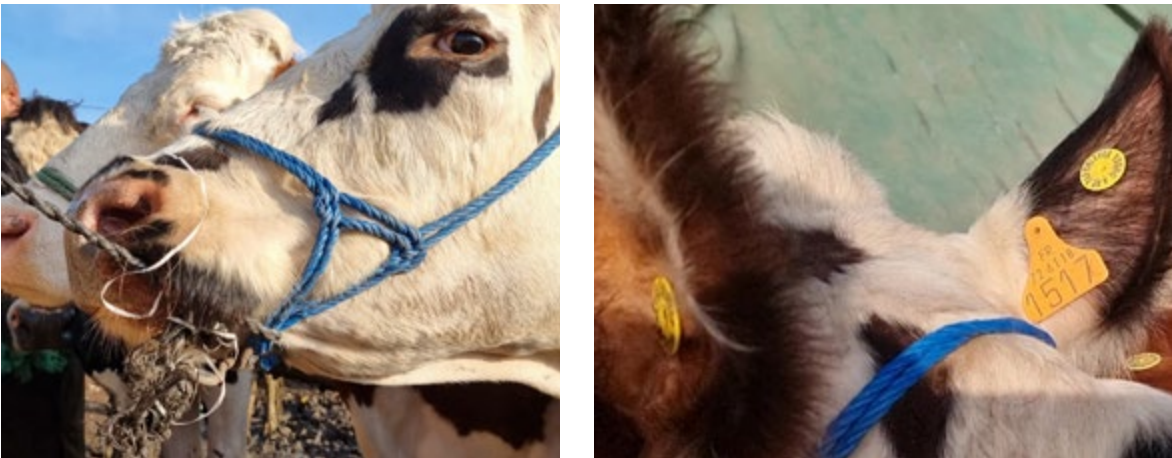
Ear tag no.	FR 72 6118 1517
MS of origin	France
Animals' Angels observations:	
Location where found	Sidi Bennour market
Date and time	14.03.2023, 08:59 –10:13 am
Purpose at market	Sold for milk production Info given by the buyer: Ivette and the other two cows on his truck will be transported to a farm in Fes (around 450 km away).
Conditions of cow	Locomotion score 2-3 ⁸ : mildly to moderately lame on right hind leg, abnormal gait and arched back when walking. Udder seems deformed and inflamed. Abrasions visible in the pelvic area on the left side and on the right tarsal joint BCS ~ 2/2.5 Slightly dirty on back and belly from old, encrusted excrement
Further remarks	Ivette is tied very shortly to a wall next to another French cow (Brigitte) and other 'dairy' cows inside the market area. She cannot properly move her head nor lie down to rest. Ivette and the other cows are standing in wet and muddy dirt. Later, two men take her, together with Brigitte and another 'dairy' cow, by the halter to the parking area of the trucks. On the way, the tails of Ivette and Brigitte are repeatedly twisted by the men.

to be continued on page 14

⁸ <https://kraiburg-elastik.com/en-gb/worth-knowing/kraiburg-focus-expert-knowledge/dairy-cattle/walking/profitability/milk-loss-from-lameness/>

Further remarks

- Loading of Ivette:
- She is loaded on a **multipurpose vehicle, not designed for animal transport**: no rooftop cover, no proper loading ramp (only very steep ramp, no lateral protection).
 - **Very brutal handling with constant tail twisting and kicking in her udder and belly.**
 - One man pulls her head by a rope from inside the truck, while another man is pushing her from the back and twisting her tail. This method is repeated several times without success – Ivette refuses to enter the truck.
 - **Blindfolded during loading**: at one point, one of the men covers her eyes/head with a plastic sack.
 - Then, a third man comes to assist in the loading.
 - After many attempts, Ivette steps with her right front leg on the loading deck. Once there, and due to the very steep loading ramp, **she slips away and falls immediately into a big hole** which is next to the truck on the left side.
 - The hole is big enough for Ivette to get stuck with her whole body. She is breathing rapidly. Her eyes are wide-open and she seems very exhausted.
 - Neither Ivette can free herself nor the three men can do so. More people approach to “help”.
 - **Ivette is not able to get up and is maltreated several times by one of the men with an electric prod into her back, while another man is pulling at her tail. The other men are pulling her head by the halter (made of rope) – without success. She keeps being stuck in the big hole.**
 - Another man comes with a long rope and with the help of the others they put the rope under her belly and start pulling on it. Finally, Ivette can get up.
 - Only due to the intervention of the Animals’ Angels team the driver could be convinced to change the position of the truck to a place where there is no hole next to the truck, and where the loading ramp can be held so that the ankle of the ramp is less steep, and the cow can “easier” access the truck.
 - Once Ivette is loaded, the driver ties her head shortly to the railing of the truck, against the direction of travel.



Left: Ivette is tied shortly to a wall. She cannot lower her head or lie down and rest. Right: French ear tag of Ivette



The owner has put a plastic cloth around her eyes/head after trying many times to load her.



Left: brutal handling during loading: the men twist her tail several times and she is loaded blindfolded. Right: due to the very steep ramp, the lack of lateral protection and lack of knowledge how to handle a cow, Ivette has fallen into a big hole next to the vehicle.



Cow Ivette standing in wet and muddy dirt at the selling area of the market.



Ivette is very exhausted after falling into the hole next to the truck.



Left: one of the workers kicks Ivette with his foot to make her move, without success. Middle and right: two workers pulling the head of Ivette, while the owner is using an electric prod.

Example 2: Cow Brigitte from France

Ear tag no.	FR 71 2041 6027
MS of origin	France
Animals' Angels observations:	
Location where found	Sidi Bennour market
Date and time	14.03.2023, 07:59 – 10:13 am
Purpose at market	Sold for milk production
Conditions of cow	<ul style="list-style-type: none">• BCS ~ 2/2.5• Her legs are dirty from old, encrusted mud and excrement
Further remarks	<p>She is tied very shortly to a wall next to the cow Ivette and other 'dairy' cows inside the market area. She is tied in a way that she cannot lie down. Brigitte and the other cows are standing in wet and muddy dirt.</p> <p>Later, two men take her, together with Ivette and another 'dairy' cow to the parking area of trucks for loading. On the way to the truck, her tail is twisted several times.</p> <p>Loading of Brigitte: She is loaded on the same multipurpose vehicle than Ivette. This vehicle is not suited for the transport of animals (see example 1 above).</p>



Cow Brigitte standing in wet and muddy dirt at the selling area of the market.



Cow Brigitte loaded onto the vehicle without rooftop cover and only a very steep, nearly vertical ramp.



French ear tag of Brigitte

Example 3: Cow Soleil from France

Ear tag no.	FR 67 7134 5181
MS of origin	France
Animals' Angels observations:	
Location where found	Sidi Bennour market
Date and time	14.03.2023, around 11:00 am
Purpose at market	Unknown, likely sold for fattening / slaughter.
Conditions of cow	Very thin, with BCS less than 2 and deeply sunken flanks.
Further remarks	She is tied to a rope attached to the ground in the middle of the market area.



Soleil sold at the market.



Left: French ear tag of Soleil

Example 4: Cow Léa from France

Ear tag no.	FR 35 2526 0203
MS of origin	France
Animals' Angels observations:	
Location where found	Sidi Bennour market
Date and time	14.03.2023, 07:34 am
Purpose at market	No information if sold for slaughter or milk production.
Conditions of cow	<ul style="list-style-type: none">• BCS 3 - 4• Small injuries on her front legs• Dirty legs and belly with encrusted excrement• Full udder
Further remarks	She is blindfolded and tied shortly to the ground next to other EU cows.



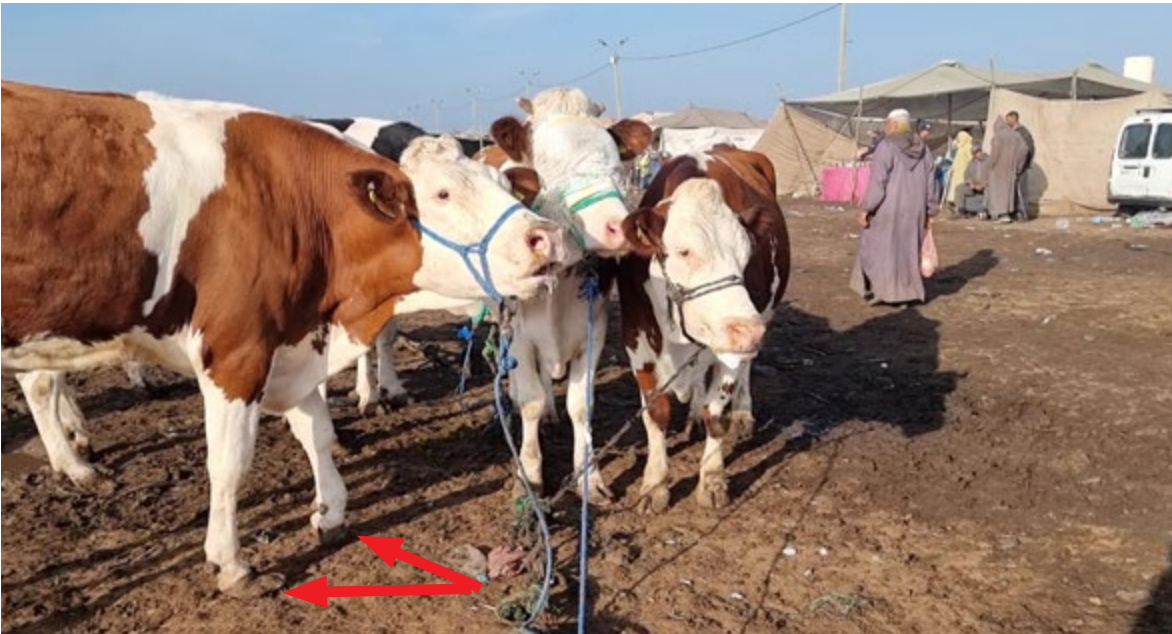
Above: Léa tied shortly in a group of other cows.



Left: Léa is blindfolded all the time. Right: Fench ear tag of Léa

Example 5: Cow Eliette from France

Ear tag no.	FR 01 1902 0580
MS of origin	France
Animals' Angels observations:	
Location where found	Sidi Bennour market
Date and time	14.03.2023, 09:20 am
Purpose at market	No information of sold for slaughter or milk production.
Conditions of cow	<ul style="list-style-type: none">• BCS approx. 3• She has deformed and overgrown front hooves.• She is limping when she moves (locomotion score 2-3).• Full udder
Further remarks	She is tied next to other four EU cows. She is vocalizing constantly.



Above: Cow Eliette with deformed and overgrown hooves.
Left: French ear tag of Eliette



Example 6: Cow Sarah from Germany

Ear tag no.	DE 05 392 50850
MS of origin	Germany
Date and place of birth	16.05.2016, in 49492 Westerkappeln, North-Rhine Westfalia
History	08.03.2018 transported to Rinder-Union-West eG in 48147 Münster, NRW / 09.03.2018 transported from there to VOST e.G. in 26605 Aurich, exported from there to Morocco.
Export to Morocco	19.03.2018
Animals' Angels observations:	
Location where found	Sidi Bennour market
Date and time	14.03.2023, 07:54 am
Purpose at market	Sold for slaughter acc. to buyer
Conditions of cow	<ul style="list-style-type: none">• Emaciated: her ribs, short ribs, hook and pin bones are sharply visible and no fatty tissue in pelvic or loin area. BCS 1.5• She seems exhausted, holding most of the time her head down.• She does not put full weight on her left hind leg – suspicion that she suffers from lameness. She has an old injury at her left rear hoof which looks deformed.• She is partly dirty with old, encrusted excrements on her belly and right side of the back.
Further remarks	Her front legs are tied together, so that she cannot move at all or lie down to rest.



Left: Sarah with low body condition, sold at the market. Right: German and Moroccan ear tags of Sarah



Impossible for Sarah to move with her front legs which are tied very tight together. Old injury at her left rear hoof and likely lame.

Example 7: Cow Adilia from Germany

Ear tag no.	DE 03 595 48684
MS of origin	Germany
Date and place of birth	11.12.2016, in 27721 Ritterhude, Lower Saxony
History	17.01.2019 transported to MASTERRIND GmbH, 27432 Bremervörde, Lower Saxony / 21.01.2019 transported to assembly centre Peitzmann, 48480 Lünne, Lower Saxony – from there exported to Morocco
Export to Morocco	04.02.2019
Animals' Angels observations:	
Location where found	Sidi Bennour market
Date and time	14.03.2023, 08:27 am
Purpose at market	For milk production acc. to driver
Conditions of cow	<ul style="list-style-type: none">• Thin, BCS 2• Her front legs are tied together by a very tight rope during the waiting time at the market• Her right hind dewclaw is bleeding; it seems recently injured.• She has old, encrusted patches of dirt on her back, legs, and udder.• She shows strong salivation during the waiting time at the market.
Further remarks	Observations during loading: <ul style="list-style-type: none">• She is tied next to a truck (multipurpose truck) to another cow (with horns).• After a few minutes, a worker brings her (with the other three cows) to another truck where they will be finally loaded. On the way to the area of the loading, the four animals are kicked by the worker in their bellies.• The truck is a multipurpose vehicle, not designed for animal transport: no rooftop cover and without a proper loading ramp (only a very steep ramp).• The truck has straw as bedding material (old, probably used many times and with an accumulation of old excrements from previous animals).• During the loading of Adilia, one worker is pulling her from the rope tied to the halter while the other worker behind her is using only his hands without kicking or hitting. Adilia steps with her front legs on the loading ramp and then inside the truck. Due to the steep and slippery "loading ramp" she slips away with her hind legs but immediately manages to stand up. The worker ties her next to the other animals inside the truck. He repeatedly twists her tail to move her.• During the loading of other cows, we observe very brutal handling with constant tail twisting and hitting especially in the belly of the animals. Also, an electric prod is used repeatedly on a cow who refuses to make this big step onto the truck.• In total, there are 8 animals loaded on the truck, including Adilia.



Left: Cow Adilia at the selling area of the market with the front legs tied together. Right: German ear tag of Adilia



Left: Multipurpose vehicle used to load a total of 8 cows. Right: During the loading, Adilia slips away on the ramp.



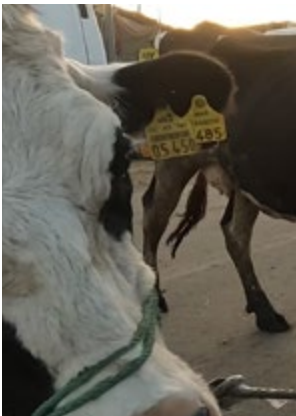
Left: Cow Ada with full udder next to Agneta on their way to be loaded. Right: the owner drives Ada between two vehicles, she is nearly stuck between both vehicles

Example 8: Cow Ada from Germany

Ear tag no.	DE 03 587 05450
MS of origin	Germany
Date and place of birth	05.10.2015, in 26427 Dunum, Lower Saxony
History	11.12.2017 transported to VOST e.G., 26605 Aurich, Lower Saxony / 12.12.2017 transported to assembly centre Peitzmann, 48480 Lünne, Lower Saxony – from there exported to Morocco
Export to Morocco	27.12.2017
Animals' Angels observations:	
Location where found	Sidi Bennour market
Date and time	14.03.2023, 08:10 / 09:00 am
Purpose at market	For milk production According to the buyer: Ada and Agneta (another cow with DE ear tag) will be transported to a farm in Kenitra for milk production.
Conditions of cow	<ul style="list-style-type: none">BCS 2.5Her legs (mainly hooves) are dirty from old and encrusted excrementHer udder is fullShe shows salivation
Further remarks	She is tied next to a group of several 'dairy' cows with horns and without horns. Loading of Ada: <ul style="list-style-type: none">Around 09:00 am a buyer takes her outside the selling area of the market, together with another German cow, Agneta.She is loaded next to Agneta in a truck that is a multipurpose vehicle, not designed for the transport of animals. It has a rooftop cover (tarpaulin) and is not equipped with a proper loading ramp (only a very steep one) and without openings for ventilation.Calm handling during the way to the truck and during the loading. One of the owners is pulling both cows at a rope.Sawdust (with very little straw) is used as bedding material.



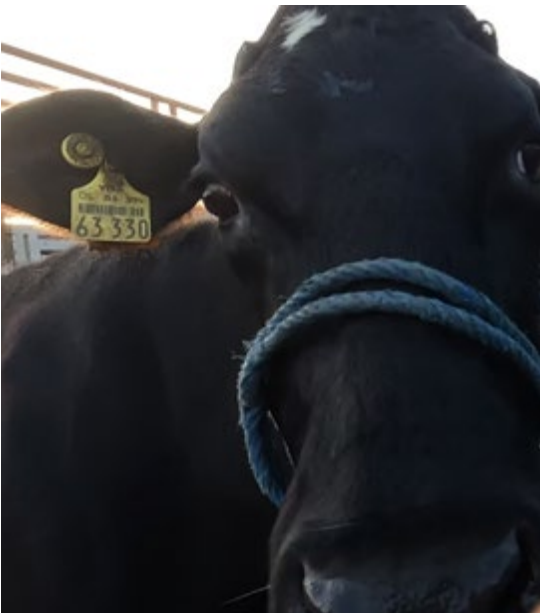
Ada and Agneta loaded at the multipurpose vehicle without ventilation.



German and Moroccan ear tag of Ada.

Example 9: Cow Agneta from Germany

Ear tag no.	DE 03 x94 63330
MS of origin	Germany
Animals' Angels observations:	
Location where found	Sidi Bennour market
Date and time	14.03.2023, 09:00 am
Purpose at market	Sold for milk production Acc. to the buyer, Agneta and Ada (see example 8) are approx. 4 years old and will be transported to a farm in Kenitra for milk production.
Conditions of cow	<ul style="list-style-type: none">• BCS 2• Her legs are dirty from old and fresh encrusted excrement.• She is vocalizing constantly.
Further remarks	Loading of Agneta: <ul style="list-style-type: none">• See example 8.• Agneta has to make a big step onto the steep loading ramp to put herself on board. One man, inside the truck, is pulling her head at the rope attached to her halter, while the owner is using his hands to drive her inside.• Once on board the truck, Agneta and Ada are tied by a rope to the bottom in front of the truck.



Left: Cow Agneta during the loading. Very steep ramp. Right: German ear tag of Agneta.

Example 10: Cow Mia from Austria

Ear tag no.	AT 84 2949 929
MS of origin	Austria
Animals' Angels observations:	
Location where found	Sidi Bennour market
Date and time	14.03.2023, 10:10 am
Purpose at market	Sold for slaughter. Acc. to the buyer, she cannot give birth anymore because she is sick and has a problem with her leg – therefore she will be sent to slaughter.
Conditions of cow	<ul style="list-style-type: none">• Very thin, with prominent ribs and deeply sunken flanks, BCS <1.5• She has old injuries on her carpal joints• Cleanliness score: 2 – old, encrusted big patches of excrement/dirt on her legs, back and belly• Her hooves are long and not properly cared for• She cannot put full weight on her left hind leg, likely due to an inflammation in this leg
Further remarks	We see Mia outside the market near the unloading and loading area. She is tied by a halter (handmade rope) and waiting next to two other local cows.



Left: Cow Mia waiting outside the market area to be transported to slaughter. Right: Austrian ear tag of Mia.

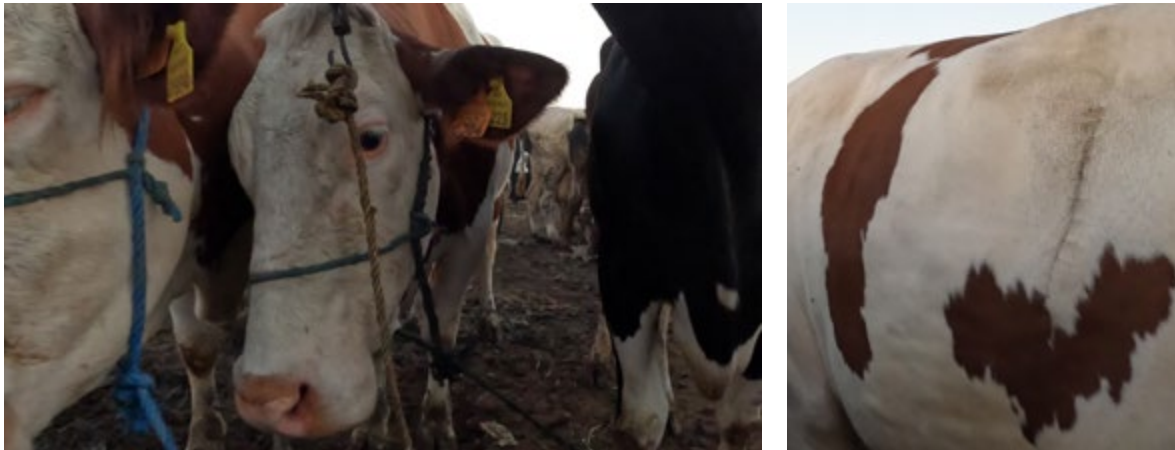
Further examples of EU cows at Sidi Bennour market:



Left: Cow Walda from Germany, DE xx xxx 35946, tied in a group of other 'dairy' cows. Right: German ear tag of Walda partly visible.



Cow Jolie from France, FR 25 3889 3261, stuck with her left front leg between the multiple ropes to which the animals are tied to the ground. She cannot lift her head.



Left: Cow Mirelle from France, FR 25 3772 2984, tied to the ground by a rope, next to other cows. Right: scar on belly of Mirelle, likely from C-section.



Cow Paulette from France, FR 25 2604 5421, sold at market with other three French cows; she is tied very short to the ground and cannot raise her head.



Cow Anais from France, FR x0 3074 6178, tied shortly to a rope next to at least 15 cows (some of them have horns). They cannot move at all.

3. Observations at Souihla market, 15.03.2023

Time of market check	07:00 am – ca. 12:15 pm	
Number of bovines (estimated)	Around 1000/1200 bovines are sold: <ul style="list-style-type: none">• bulls and calves for fattening and slaughter• unweaned and young calves• female calves for breeding and milk production• 'dairy' cows• 'spent' cows for slaughter	
Origin of bovines	<ul style="list-style-type: none">• Most of the animals with Moroccan ear tags or without any identification of their origin• Many cows of Rotbunte, Holstein and Montbeliard breeds• A total of 9 'dairy' cows with EU ear tags documented: 3 x Germany, 6 x France.	
List of 'dairy'/'spent' cows observed at Souihla market	<div><div><ul style="list-style-type: none">• DE 03 620 19 756• DE 05 400 24 344• DE 03 609 66 365• FR 22 1215 5514• FR 22 1266 3556</div><div><ul style="list-style-type: none">• FR 25 3903 4274• FR 29 2692 9328• FR 44 4117 1588• FR 56 3209 4504</div></div>	

General impression of the Souihla market, March 2023:

In general, the bovines sold at the market are in poor and neglected conditions: thin and emaciated cows are observed, as well as unweaned calves with sunken flanks and diarrhoea. Injured animals with bloody noses or broken horns are found as well as cows with overgrown hooves, sick cows with inflamed udders and animals with respiratory problems, nasal discharge, and diarrhoea.

Concerning the transport conditions, inappropriate transport vehicles not designed for animal transport, are widely used and the handling during loading must be described as brutal.

Photographic evidence – general observations:



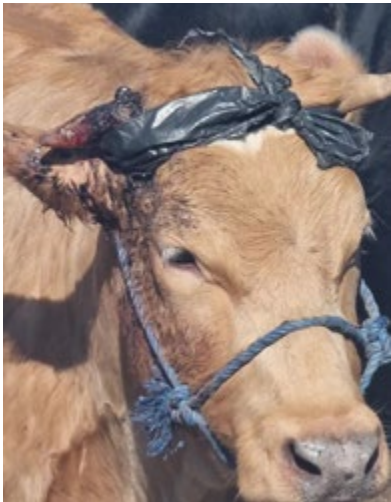
A group of cows with horns and without horns tied together so that they cannot naturally move their head or lie down and rest. One of the cows is blindfolded.



At Souihla market, in some occasions, they use the animals to tie to other animals. There is no infrastructure (pens, railings) to accommodate the animals.



Left: 'dairy' cow sold for slaughter, with injury in her left pin bone. Right: example of emaciated 'dairy' cows sold at the market of Souihla.



Left: cow in very poor condition, emaciated, with swollen, inflamed udder and very dirty. Right: young bull with a broken horn.



Loading of blindfolded bull. The worker twists heavily his tail (common practice during the loading of the animals).



Examples of the trucks (multipurpose vehicles) used to transport bovines in two decks.



Brutal handling while moving the animals from one place to another in the market: kicking and hitting with wooden sticks; tail twisting; forcing animals to “walk” blindfolded and/or with their front legs tied together.



General impression of the market area of Souihla market.

Examples of ‘dairy’ cows with EU ear tags sold at Souihla market, March 2023:

Example 1: Cow Merle from Germany

Ear tag no.	DE 03 620 19756
MS of origin	Germany
Date and place of birth	29.04.2019, in 26197 Großenkneten, Lower Saxony
History	14.05.2020 transported to Synetics Germany GmbH, 49661 Cloppenburg, Lower Saxony / 10.06.2020 transported to Synetics Germany GmbH, 26931 Elsfleth, Lower Saxony / 25.05.2021 transported to MASTERRIND GmbH, 26160 Bad Zwischenahn, Lower Saxony / 27.05.2021 transported to Schoppe Livestock GmbH & Co. KG, 49832 Messingen, Lower Saxony – from there exported to Morocco
Export to Morocco	11.06.2021
Animals’ Angels observations:	
Location where found	Souihla market
Date and time	15.03.2023, 08:17 –ca. 10:00 am
Purpose at market	For milk production
Conditions of cow	<ul style="list-style-type: none">BCS 2Her udder is very full. She is losing milk.
Further remarks	<p>She is tied by a halter and rope to a metal bar, together with her unweaned baby calf who is muzzled so that he cannot drink from his mother’s milk. Her calf is also tied to the metal bars with a rope around his left leg.</p> <p>Both are sold at the market to a farmer who transports them to his farm near Marrakech, about 20 km from the market.</p> <p><u>Loading of Merle and her calf:</u></p> <ul style="list-style-type: none">Around 09:44 am Merle and her calf are brought to the loading area outside the market.Once outside the market, they park the vehicle next to a stationary “ramp”.The vehicle used to transport Merle and her calf is a pick-up car, not suitable to transport animals: without rooftop cover, no proper side protection, no loading ramp and no space onboard.No bedding material is used. The metal floor is completely visible.First, they load the calf and tie him to the railing of the right lateral side of the vehicle.Secondly, one man inside the vehicle pulls from the rope attached to Merle’s halter while the other man pushes her from the back. There is a gap resp. no lateral protection between the back door of the pick-up car and the stationary ramp so that Merle nearly gets stuck resp. slips off the ramp with her left front leg.Once she is inside the vehicle, the man behind her starts twisting her tail several times to make her step forward and then close the small door of the pick-up.



German and Moroccan ear tag of Merle.



Left: Merle's baby calf is muzzled and tries in vain to drink. Merle is losing milk from her full udder. Right: loading of Merle's calf on a small pick-up car.



During the loading onto the small pick-up car, Merle nearly slips off the ramp due to lack of a proper loading ramp and no lateral protection.



Left: during the loading of Merle, the driver twists her tail several times. Right: pick-up car used to transport Merle and her calf.

Example 2: Cow Karla from Germany

Ear tag no.	DE 05 400 24344
MS of origin	Germany
Date and place of birth	14.02.2018, in 57368 Lennestadt, North-Rhine Westfalia
History	02.12.2019 transported to Rinder-Union-West eG, 48147 Münster, NRW / 16.12.2019 transported to VOST e.G., 26605 Aurich, Lower Saxony / 17.12.2019 transported to assembly centre Peitzmann, 48480 Lünne, Lower Saxony – from there exported to Morocco
Export to Morocco	07.01.2020
Animals' Angels observations:	
Location where found	Souihla market
Date and time	15.03.2023, 08:25 am
Purpose at market	Sold for milk production
Conditions of cow	<ul style="list-style-type: none">BCS 2, with sunken flanksHer udder is very full and losing milk.
Further remarks	We find Karla next to another EU cow (Karina). Both are sold together to a farmer. Loading of Karla: <ul style="list-style-type: none">During the way to the loading area, we see people hitting her with their hands.Around 08:30 am, Karla and Karina are loaded onto an old Mercedes van: a vehicle totally inadequate for transporting animals: the vehicle is completely closed (only little openings on the right side), slippery floor (covered with very old excrement) and without any ventilation.Inside the vehicle, there is already another 'dairy' cow loaded on the left side of the vehicle and with her head looking in the opposite direction of driving.Karla is the second cow loaded onto the van on the right side of the van, with her head looking in driving direction of the vehicle.Once inside, the driver ties her head to the openings.



Left: German ear tag of Karla. Right: loading of Karla – she has to make a step to get inside the totally inadequate transport vehicle.



Karla on the right side next to Karina and the third cow.

Example 3: Cow Karina from Germany

Ear tag no.	DE 03 609 66365
MS of origin	Germany
Date and place of birth	28.02.2018, in 26737 Krummhörn, Lower Saxony
History	19.12.2019 transported to VOST e.G., 26605 Aurich, Lower Saxony / 19.12.2019 further transported on the same day to assembly centre Peitzmann, 48480 Lünne, Lower Saxony – from there exported to Morocco
Export to Morocco	06.01.2020
Animals' Angels observations:	
Location where found	Souihla market
Date and time	15.03.2023, 08:25 am
Purpose at market	Sold for milk production
Conditions of cow	<ul style="list-style-type: none">Very skinny, with BCS 1.5 and deeply sunken flanks.Full udderHer legs and belly are dirty from old, encrusted excrements.She seems in a neglected state.
Further remarks	Karina is sold at the market with her baby calf and another German cow, Karla. She is sold to a farmer together with Karina, but not with her baby calf. Her baby calf is muzzled so that he cannot drink from the mother's milk. Loading of Karina: <ul style="list-style-type: none">During the way to the loading area, we see people hitting Karina and Karla with their hands, and the owner twists the tail of Karina.Around 08:30 am, Karina and Karla are loaded onto an old Mercedes van: a vehicle totally inadequate for transporting animals: the vehicle is completely closed (only some openings on the right side), slippery floor (covered with very old excrements) and without any ventilation. See example 2 (Karla).During the loading, Karina hits her back twice at the doorframe since the entrance/height of the doorframe is too low for a Holstein cow.Karla is the third cow loaded onto the van and placed between the two other cows with her head looking in the same direction of the vehicle as Karla.Once inside, the driver ties her head with a rope to the bottom of the van.



Left: Karina next to Karla at the selling area of the market. Above: German ear tag of Karina



During the loading, Karina hits her back at the doorframe due to the insufficient height of the van. In total, three cows are loaded on this van.

Example 4: Cow Octavie from France

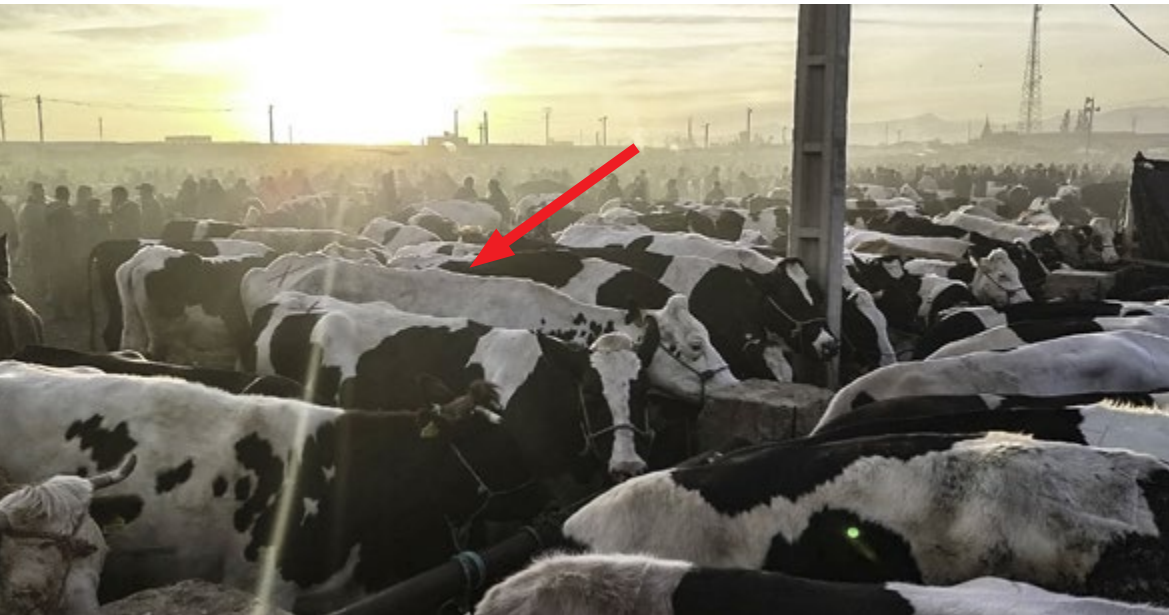
Ear tag no.	FR 22 1215 5514
MS of origin	France
Animals' Angels observations:	
Location where found	Souihla Market
Date and time	15.03.2023, 08:02 am
Purpose at market	Sold for milk production
Conditions of cow	BCS 2.5
Further remarks	She is tied next to a group of at least 30 'dairy' cows and at least 3 bulls. According to one of the owners, most of the cows come from a big 'dairy' farm in Marrakech. She has a handmade halter made of rope. It looks tight around her head.



French and Moroccan ear tag of Octavie

Example 5: Cow Suzanne from France

Ear tag no.	FR 22 1266 3556
MS of origin	France
Animals' Angels observations:	
Location where found	Souihla Market
Date and time	15.03.2023, 08:03 am
Purpose at market	Sold for milk production
Conditions of cow	<ul style="list-style-type: none">• BCS 2• with old, encrusted patches of dirt on her legs, back and belly
Further remarks	She is tied next to a group of at least 30 'dairy' cows including the cow Octavie and at least 3 bulls. According to one of the owners, most of the cows come from a big 'dairy' farm in Marrakech.



Suzanne tied to the metal bars next to other 'dairy' cows.



French ear tag of Suzanne

Example 6: Cow Sylvie from France

Ear tag no.	FR 25 3903 4274
MS of origin	France
Animals' Angels observations:	
Location where found	Souihla Market
Date and time	15.03.2023, 07:52 am
Purpose at market	Unknown
Conditions of cow	<ul style="list-style-type: none">• BCS ~3, with sunken flanks• Her hooves seem long and not well-cared for
Further remarks	She is tied to the ground shortly, so she cannot move her head adequately. She looks restless and nervous, looking around herself constantly.



Above and left below: Sylvie is tied to the ground shortly so she cannot raise properly her head. Right: French ear tag of Sylvie

Example 7: Cow Lucienne from France

Ear tag no.	FR 29 2692 9328
MS of origin	France
Animals' Angels observations:	
Location where found	Souihla Market
Date and time	15.03.2023, 08:07 am
Purpose at market	Sold for milk production
Conditions of cow	<ul style="list-style-type: none">• BCS 1.5, emaciated with protruding ribs, vertebra and hook and pin bones very prominent, and sunken flanks.• She looks very tired and shows signs of pain (with ears backwards/hanging down, tension of the facial muscles and increased tonus of the lips).• She has an old injury on the left thigh and also abrasions.• Her legs and belly are very dirty.
Further remarks	<p>We first meet her with a group of 30 cows, together with Suzanne and Octavie. She is also tied shortly to the metal bar so that she cannot raise her head adequately.</p> <p>A few hours later we find her separated from the other cows and with the front legs tied together. She manages to lie down even though her front legs are tied together. She looks very exhausted.</p>



Left: Lucienne tied next to the metal bar; with French and Moroccan ear tag. Right: Lucienne with the front legs tied together.



Lucienne lies down on the ground, with tied front legs. She is extremely exhausted and seems to be in pain.

Example 8: Cow Yolande from France

Ear tag no.	FR 44 4117 1588
MS of origin	France
Animals' Angels observations:	
Location where found	Souihla Market
Date and time	15.03.2023, 08:14 am
Purpose at market	Unknown
Conditions of cow	BCS 2
Further remarks	No further info.



Yolande at the selling area of the market.



French ear tag of Yolande.

Example 9: Cow Ophélie from France

Ear tag no.	FR 56 3209 4504
MS of origin	France
Animals' Angels observations:	
Location where found	Souihla Market
Date and time	15.03.2023, 07:54 am
Purpose at market	Sold for milk production
Conditions of cow	<ul style="list-style-type: none">BCS 3Ophélie has dirt on the legs and the belly with old, encrusted patches of excrements.Her front hooves look long and not well-cared for.
Further remarks	She is blindfolded with plastic cloth.



French cow Ophélie blindfolded with plastic cloth.



Ophélie blindfolded at the market.



French ear tag of Ophélie.

- ➔ Not only in Morocco, but also in other non-EU countries we document animals from the EU sold at markets or assembly centres under alarming animal welfare conditions.
- ➔ Not only in Morocco, but also in other non-EU countries it is impossible for EU authorities to control and trace what happens to the exported animals once they leave EU territory.

Another example: Egypt

Assembly centre of El-Qaysar (coord. 30.612965, 32.040469), November 2022:
According to the information received on-site, they import animals from all over the world, including from the European Union. They have capacity for 5,000 animals including bovines and sheep. The animals are mainly bought for meat production – either they are slaughtered in Egypt for the local market, or the live animals are exported by road from this place to other countries such as Palestine.

Observations:
Despite the recently built facility with quite good infrastructure, **the conditions of many animals are extremely poor and signs of shipping fever are observed in the animals:** many calves and bulls for slaughter lie down in lateral position and their heads on the ground. They show laboured breathing and have (heavily) bloated bellies. Many animals have nasal and ocular discharge. **What is particularly alarming is that these animals do not receive any veterinary treatment but are left to their fate.**

Photographic evidence:



Imported calf (left) and bull (right), likely imported from Ukraine, in moribund state – no veterinary treatment granted to them.



Three imported bulls (ear tags unknown) in extremely poor condition – no veterinary treatment granted to them.

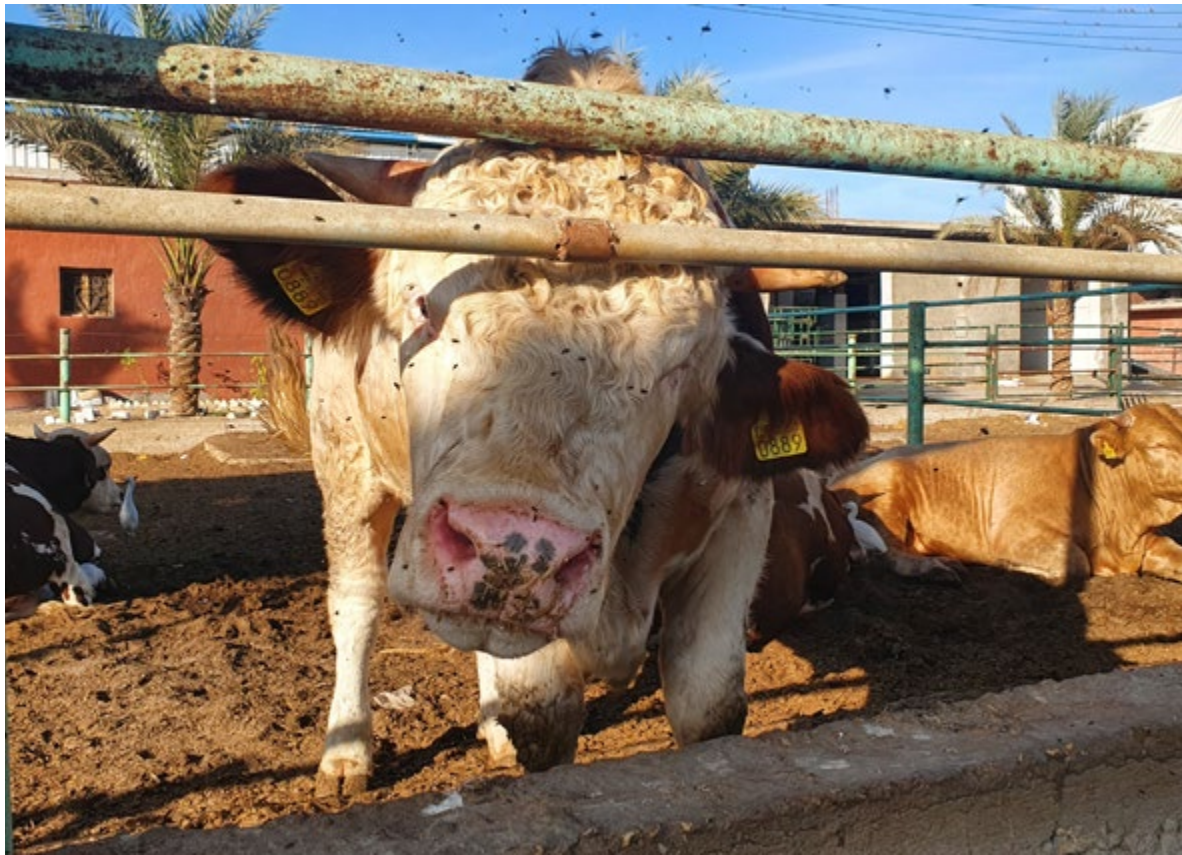
Also, animals from the EU are traded there. We document at least seven EU cattle, among them are:



German cow Irmi, ear tag DE 09 x34 37 991. It is unclear if she is sold for slaughter or for further export to another country.



Hungarian cow Réka, ear tag no. HU 34 826 36651. It is unclear if she is sold for slaughter or further export to another non-EU country.



Romanian bull Marian, ear tag no. RO 50 4 01180 0889. Also, his fate remains unclear if slaughtered in Egypt or exported to another non-EU country to be slaughtered there.



Latvian bull Kristaps, ear tag no. LV 060 30 321 0031. It is unknown if he is sold for slaughter or for further export to another country to be slaughtered there.

Another example: Qatar

Al-Wakra market, Doha, October 2022:
Four 'dairy' cows from Germany were observed in very poor conditions at the market. They were sold for slaughter and killed in the adjacent slaughterhouse the next day. Among them, we found:

Cow Ulrike, DE 03 614 09425:
Born 26.03.2019 in 26446 Friedeburg, Lower Saxony; exported to Qatar via VOST Aurich on 07.12.2020 where she was slaughtered nearly two years later.



Ulrike with a highly swollen and inflamed left hind foot. Her back is arched, and her face is tense. She is severely lame and suffers from pain. Her body condition is extremely low, and she is severely emaciated (BCS 1). Al Wakra, Qatar, 26.10.2022.



Left: Ulrike driven to the slaughterhouse adjacent to the market, 27.10.2022. Right: close-up of her inflamed left hind foot.

Cow Pia, DE 09 532 45436:

Born 07.03.2019 in 87773 Pleß, Bavaria; on 11.11.2020 transported via Schwabenhalle Buchloe to VOST Aurich from where she was exported to Qatar on 17.11.2020. On 27.10.2022, nearly two years later, she was slaughtered there.



Pia stands with arched back. She is severely lame and cannot put weight on her right hind leg, which is very swollen and inflamed in the fetlock area. Also, with decubitus ulcer. Al Wakra, 26.10.2022.



Left: Pia's right hind foot is very swollen and inflamed. Suspicion of foot rot. Right: Bavarian ear tag of Pia, DE 532 45436 and additional ear tag 49558. Al Wakra, Qatar, 26.10.2022.



Cow Elisa, DE 08 171 38355:

Born 08.11.2018 in 78183 Hüfingen, Baden-Wuerttemberg. On 08.12.2020 transported via agroService GmbH to VOST Aurich, from where she was exported to Qatar on 14.12.2020. One year and 10 months later, on 27.10.2022, she was slaughtered there.



Elisa consistently stretches her right front leg forward to avoid putting weight on it (red arrow). She is severely lame, stands with her back arched and shows clear signs of a pain face. Al Wakra, Qatar, 26.10.2022.

Another example: Uzbekistan – 'dairy' farm importing EU animals went bankrupt

In February 2020, Animals' Angels accompanied two transports of pregnant heifers from the Netherlands to a 'dairy' farm in the village Ramadan, in the rural outskirts of Tashkent, Uzbekistan (coordinates 41.336757, 69.097266).

Back then, the owner explained that he bought the farm only a year and a half ago, and that he plans to renovate it. In total, he had imported 197 cows from the EU and plans to import about 200 more EU cows in 2020. In the future, when calves are born, they are planning to sell them to the local farmers.

On 28th April 2021, Animals' Angels went back to this farm to check the conditions of the imported EU animals.

However, when arriving there, the farm is abandoned, and the gates and entrance doors of the farm are locked. Locals explain that the farm went bankrupt. The owner had bought heifers from the EU in the past, but they all were sold in the meanwhile – it is unknown to whom and for what purpose they were sold (further breeding/milk production or slaughter?).

This is just another example showing that it is impossible to control what happens to the animals after leaving the EU.

Conclusion

“Doing nothing is not an option. Change is necessary...”⁹

...because animal welfare is a key component of our sustainable food production system”, as stated by Commissioner Stella Kyriakides during the Agriculture and Fisheries Council meeting on 30.01.2023. This must also count when it comes to the export of live animals to non-EU countries.

How many more evidence and shocking footage of immense animal suffering do EU governments need to finally take responsibility for our animals?

Animals’ Angels and other NGOs as well as journalists have repeatedly documented severe ‘farm’ animal abuse and cruelty during transport, handling at markets and at slaughter in different importing countries of North Africa and the Middle East region. Common practices include the beating and kicking of animals, tail-twisting, stabbing, hitting them into sensitive body parts such as head, genitals or udder, pulling them by their horns, blind-folding, grabbing into their eyes, throwing them on the ground and even severing their leg tendons for easier control and handling. Also, ‘slaughter’ cattle are hoisted up on one hind leg and hanging upside-down with full consciousness. The slaughter of animals is without stunning and executed most likely by untrained workers, often cutting the animal’s throat with several knife cuts. Such practices would clearly be classified as cruelty to animals under EU law and are a contradiction of Article 13 TFEU.

To date, however, not a single EU Member State has taken the step towards a national ban or clear restriction on the export of live animals to countries without welfare guarantees for the animals. At EU level, a uniform EU-wide solution in this context still seems a long way off. Economic interests simply take precedence over ethical concerns, and the animals lose out. It is time to change this.

As stated by Guretzki (2021), the export to non-EU countries without animal welfare guarantees deprives the animals concerned of their status of protection within the EU and, at the same time, contradicts the demand of EU citizens calling for even higher animal welfare standards.¹⁰

It is to be welcomed that the EU supports through WOAHA capacity building programs concerning the protection of animals during transport and slaughter in certain non-EU countries. However, these education and training measures can in no way replace the lack of a legal framework nor the lack of implementation mechanisms.

After all, in June 2022, the Netherlands, Denmark, Belgium, Germany and Sweden called in their joint position paper for a revision of the EU’s legislation on animal transport to restrict the live export of ‘farm’ animals to non-EU countries “where the third country’s legislation is not equivalent to the EU’s standards on animal welfare”¹¹.



Time to Act!

We urge the EU Member States and the EU Commission – please take a stand for our animals and support this call for an EU-wide export ban of animals to non-EU countries without animal welfare guarantees.

At the same time, we would like to remind each individual Member State of its own responsibility. We know that only an EU-wide export ban can close loopholes. Nevertheless, we ask the Member States to act according to their own understanding of animal welfare and according to their responsibility towards sentient beings and our fellow creatures. Each Member State now has the opportunity to take the lead and start implementing the goals and values of our community.

⁹ https://ec.europa.eu/commission/presscorner/detail/en/speech_23_465

¹⁰ Guretzki, Torben (2021) „Kuh-Tourismus“ auf Abwegen. Die Ausfuhr lebender Tiere aus der EU in Drittstaaten und die Möglichkeiten, diese aus Gründen ihres Schutzes einzuschränken, EuZW, edition 23/2021. p. 1031

¹¹ https://www.bmel.de/SharedDocs/Downloads/EN/_Animals/position-paper-eu-legislation-animal-transport.pdf?__blob=publicationFile&v=2



ANIMALS' ANGELS

we are there with the animals

