Policy Brief #5

The European Institute
for Animal Law & Policy
ACHIEVING BETTER TREATMENT FOR ANIMALS

The Road to Reform

In Support of a Strong Revision of Animal Transport Rules

Introduction

The European Union is the world's biggest exporter of live animals, transporting more than 1.5 billion animals within the EU and beyond its borders every year.[1] While Regulation (EC) 1/2005 on the Protection of Animals During Transport (Animal Transport Regulation) is meant to ensure animal welfare during transport, this outdated piece of legislation has proven to be insufficient in its legal drafting, which includes vague and incomplete definitions, and its implementation at the Member State level has been poor, resulting in widespread noncompliance. As a result, animals are only provided with an intangible, paper-thin protection that does not prevent their intense suffering even when properly enforced, let alone when routinely breached.

The media frequently inform about animals stranded at border crossings or stuck in vessels for days or weeks when refused an entry into a third country and about vulnerable animals submitted to long journeys while young, pregnant, or exhausted, with transports continuing through scorching heat or freezing temperatures. The story of the 14,000 sheep that died in 2018 aboard the capsized vessel *Queen Hind* near the Romanian port of Midia, or of nearly 3,000 bulls from Spain loaded onto the vessels *Karim Allah* and *Elbeik*, which spent months stranded at sea without proper care after having been denied entry into Turkey,[2] are cautionary tales that reveal the holes in a system that treats animals as an afterthought.

The revision of the Animal Transport Regulation presents a unique opportunity to remedy this tragic state of affairs and to adopt strong, science-based legislation that considers not only economic factors, but also the welfare of animals. On 7 December 2023, the European Commission published a proposal to revise the existing rules. However, the negotiations in the European Parliament and the Council of the EU, the co-legislators for this file, have been slow and unproductive. The proposal has proven contentious, with opposition largely reflecting the interests of those who benefit from the current framework, which poses serious risks to animal welfare.

This policy brief summarizes the lessons of the past 18 years during which the Animal Transport Regulation has been in force, along with evidence gathered since 2020, when the European Union began the process of revising its animal welfare legislation. Our findings unambiguously show that new, robust regulatory standards are urgently needed – supported by available science and demanded by EU citizens.

1 European Court of Auditors (2023). Transport of live animals in the EU – Challenges and opportunities, Publications Office of the European Union. Available at: https://data.europa.eu/doi/10.2865/211704.

2 Robin des Bois, Animal Welfare Foundation e.V. (2024). 64 EU-approved livestock carriers. Available at: https://www.animal-welfare-foundation.org/en/blog/die-gefaehrlichsten-schiffe-der-welt.

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Animal Transport in Numbers

3 European Court of Auditors (2023). Transport of live animals in the EU – Challenges and opportunities, Publications Office of the European Union. Available at: https://data.europa.eu/doi/10.2865/211704.

4 European Parliament: Directorate-General for Internal Policies of the Union (2021). Patterns of livestock transport in the EU and to third countries – Research for ANIT Committee. Available at: https://data.europa.eu/doi/10.2861/400742.

5 *Ibid*.

6 European Commission (2022). Study on shifting from transport of unweaned male dairy calves over long distance to local rearing and fattening, Publications Office of the European Union, https://data.europa.eu/doi/10.2875/072915.

7 Comext, data for 2022.

8 Bayerisches Staatsministerium für Umwelt und Verbraucherschutz. Tiertransporte in Drittstaaten. Available at: https://www.stmuv.bayern.de/themen/tiergesundheit_tierschutz/tierschutz/tiertransporte_drittstaaten/index.htm (last accessed 1 September 2025)

1.6 billion cattle, sheep, pigs, and poultry are transported across EU countries and outside the EU, making the EU the biggest live animal exporter in the world.[3]

Intra-EU trade in live animals represents **85%** of transports

15% of transports are exports to third countries.[4]

Poultry is the most traded farmed animal in Europe, representing

98% of intra-EU trade

97% of extra EU trade.[5]

1.4 billion unweaned calves are traded between EU countries every year.[6]

More than **4.3 million** cattle, sheep, and pigs are exported to non-EU countries. Many of the most frequent export destinations are listed among the 18 high-risk countries for animal welfare.[8]

9 Robin des Bois, Animal Welfare Foundation e.V. (2024). 64 EU-approved livestock carriers. Available at: https://www.animal-welfare-foundation.org/en/blog/die-gefaehrlichsten-schiffe-der-welt.

10 *Ibid*.

11 Four Paws International (2022). 900,000 European Citizens Call on MEPs to Ban Cruel Live Exports. Available at: https://www.four-paws.org/ our-stories/press-releases/january2022/900-000-european-citizens-callon-meps-to-ban-cruel-live-exports.

12 European Commission (2023). Special Eurobarometer 533: Attitudes of Europeans towards Animal Welfare. Available at: https://europa.eu/eurobarometer/surveys/detail/2996.

13 European Commission, Factual summary report of the online public consultation in support to the fitness check and revision of the EU animal welfare legislation, Ref. Ares(2022)2359311 - 30/03/2022.

15

EU-approved high-risk livestock vessels are still allowed to transport animals.[9]

Between 2021 and 2023,

3/4

of EU livestock vessels were reported to have pollution prevention deficiencies.[10]

40%

of inspections reveal breaches of the Animal Transport Regulation.

900,000

citizens signed a petition to ban animal exports in 2022.[11]

83%

of Europeans think that the travel time for the transport of animals should be limited.[12]

94%

of the nearly 60,000 respondents to the 2021 public consultation on the revision of animal welfare legislation support a ban on live animal exports for slaughter, including one-third of business operators.[13]

1. Evidence in Support of Strong Transport Rules

In recent years, policymakers have gathered extensive evidence supporting the revision of animal transport rules. In 2020, the European Parliament set up an inquiry committee on animal transport (ANIT) to investigate the degree to which the Animal Transport Regulation is enforced and to identify challenges and opportunities for improving animal welfare during transport. During its mandate, ANIT hosted several hearings, invited testimony from scientists, producers, and NGOs active in the field, and commissioned several studies. ANIT concluded that enforcement of the Animal Transport Regulation remains problematic and that wide-scale non-compliance persists.[14]

In 2022, the European Parliament's Plenary adopted a set of recommendations on animal transport,[15] ahead of the planned revision of the Animal Transport Regulation. That same year, the European Food Safety Authority (EFSA) published a series of scientific opinions requested by the European Commission. These opinions, addressing the welfare of specific species during transport, provide up-to-date scientific evidence that should guide the legislative revision.

Additionally, the European Court of Auditors (ECA) report from 2023[16] and the European Parliament Research Service (EPRS) study from 2025[17] both conclude that the current framework is failing in practice, underscoring the need to strengthen the legislative standards in line with animal welfare science to effectively reduce animal suffering. This chapter highlights the key findings on animal transport that should be considered during the co-legislators' negotiations.

1.1 Conditions during Transport

- **Journey length**

Journey duration plays a crucial role in determining the welfare risks animals face during transport, namely hunger, thirst, heat or cold stress, motion stress, injuries, resting problems, and gastroenteric disorders. These risks need to be taken into account when proposing legally binding maximum journey times, as animals are very likely to suffer when the scientifically recommended thresholds are exceeded.

14 Report on the investigation of alleged contraventions and maladministration in the application of Union law in relation to the protection of animals during transport within and outside the Union, 2020/2269(INI).

15 European Parliament recommendation of 20 January 2022 to the Council and the Commission following the investigation of alleged contraventions and maladministration in the application of Union law in relation to the protection of animals during transport within and outside the Union (2021/2736(RSP)).

16 European Court of Auditors (2023). Transport of live animals in the EU – Challenges and opportunities, Publications Office of the European Union. Available at: https://data.europa.eu/doi/10.2865/211704.

17 European Parliament: Directorate-General for Parliamentary Research Services (2025). Animal welfare during transport – Update on the implementation of Council Regulation (EC) No 1/2005, Publications Office of the European Union, https://data.europa.eu/doi/10.2861/8758557.

18 European Food Safety Authority (2022). Welfare of cattle during transport, EFSA Journal 20(9). https://doi.org/10.2903/j.efsa.2022.7442.

19 European Food Safety Authority (2022). Welfare of small ruminants during transport, EFSA Journal 20(9). https://doi.org/10.2903/j.efsa.2022.7404.

EFSA's scientific opinions showed that feed and water withdrawal of 8-12 hours, depending on species, leads to prolonged hunger and thirst. It is not always possible to feed and water animals aboard, and even when food and water are available, animals may be unable to eat or drink.[18, 19, 20, 21, 22] Moreover, as some species are fasted before the transport commences, the journey only intensifies the suffering of already-hungry animals.

In the case of certain species or categories of animals, there are specific considerations which must be acknowledged. For example, the welfare of birds experiencing heat stress will be compromised after 4 hours;[23] behavioural signs of dehydration in horses can be seen after transport of 3 hours;[24] and unweaned calves must be fed every 12 hours and allowed to rest at least 3 hours after feeding to prevent reflux. Regarding the latter, EFSA importantly noted that no studies to date have documented that it is possible to feed calves on trucks.[25] EFSA also generally recommends shorter journey times for "end-of-exploitation" animals (e.g., laying hens, sows or dairy cows removed from production and sent to slaughter), which face heightened vulnerabilities, such as increased risk of heat stress.

20 European Food Safety Authority (2022). Welfare of pigs during transport, EFSA Journal 20(9). https://doi.org/10.2903/j.efsa.2022.7445.

21 European Food Safety Authority (2022). Welfare of equidae during transport, EFSA Journal 20(9). https://doi.org/10.2903/j.efsa.2022.7444.

22 European Food Safety Authority (2022). Welfare of domestic birds and rabbits transported in containers, EFSA Journal 20(9). https://doi.org/10.2903/j.efsa.2022.7441.

23 *Ibid*.

24 European Food Safety Authority (2022). Welfare of equidae during transport, EFSA Journal 20(9). https://doi.org/10.2903/j.efsa.2022.7444.

25 European Food Safety Authority (2022). Welfare of cattle during transport, EFSA Journal 20(9). https://doi.org/10.2903/j.efsa.2022.7442.

Animals transported for slaughter across Europe through the Bulgarian-Turkish border, 2018. © Jo-Anne McArthur / Eyes On Animals / We Animals

Long-haul transport in the EU is primarily driven by economic factors, as farmers and producers seek to reduce costs by making use of lower costs in certain Member States, with animal suffering being the negative externality. As ECA finds, the strain that transport puts on animal welfare could be alleviated by reducing both the number and length of journeys, and by favoring transport of meat instead of live animals, as well as promoting local and mobile slaughter wherever feasible.[26]

Moreover, there are also non-welfare arguments for such a transition. EFSA has warned that longer journeys are associated with greater cross-contamination between animals, increasing the risk of antimicrobial resistance and emergence of zoonoses.[27] Minimizing transports of live animals therefore benefits not only animal welfare but also supports the public health objectives of EU policy. In line with this, the European Parliament has recommended that journeys to slaughter not exceed eight hours, while supporting the inclusion of provisions on the selection of the shortest, most suitable route to the final destination.[28]

- **Thermal conditions**

Temperature limits are another key regulatory standard. EFSA found that heat stress begins at around 25°C for cattle,[29] horses,[30] and pigs,[31] and at 32°C for shorn sheep.[32] Similarly, temperatures below thermal comfort zone compromise animal welfare as cold stress is a highly relevant concern, especially for young or end-of-exploitation animals, such as laying hens. Importantly, the microclimate inside vehicles depends not only on external temperatures but also on animals' body heat and stocking density, which, if high, can impede ventilation. Humidity is another critical factor that must be continuously monitored, alongside temperature.[33]

In its recommendations, the European Parliament called for a strict application of the minimum and maximum temperatures inside the vehicle and recommended that in case temperature forecast exceeds the 5°C and 30°C, journeys should only be approved if the means of transport is equipped with systems capable of maintaining inside temperature within the range.[34]

- **Space allowance**

The provision of adequate horizontal and vertical space on board is crucial for animals to thermoregulate properly to mitigate the risk of overheating. It also allows them to adjust their position when the vehicle is moving, eat and drink, and adopt natural resting postures. In their scientific opinions, EFSA proposed the calculations for space allowance per species of both free-moving animals and animals transported in containers, such as

26 European Court of Auditors (2023). Transport of live animals in the EU – Challenges and opportunities, Publications Office of the European Union, https://data.europa.eu/doi/10.2865/211704.

27 European Food Safety Authority (2022). Transmission of antimicrobial resistance (AMR) during animal transport, EFSA Journal 20(10). https://doi.org/10.2903/j.efsa.2022.7586.

28 Point 87 and 93, European Parliament recommendation of 20 January 2022 to the Council and the Commission following the investigation of alleged contraventions and maladministration in the application of Union law in relation to the protection of animals during transport within and outside the Union (2021/2736(RSP)).

29 European Food Safety Authority (2022). Welfare of cattle during transport, EFSA Journal 20(9). https://doi.org/10.2903/j.efsa.2022.7442.

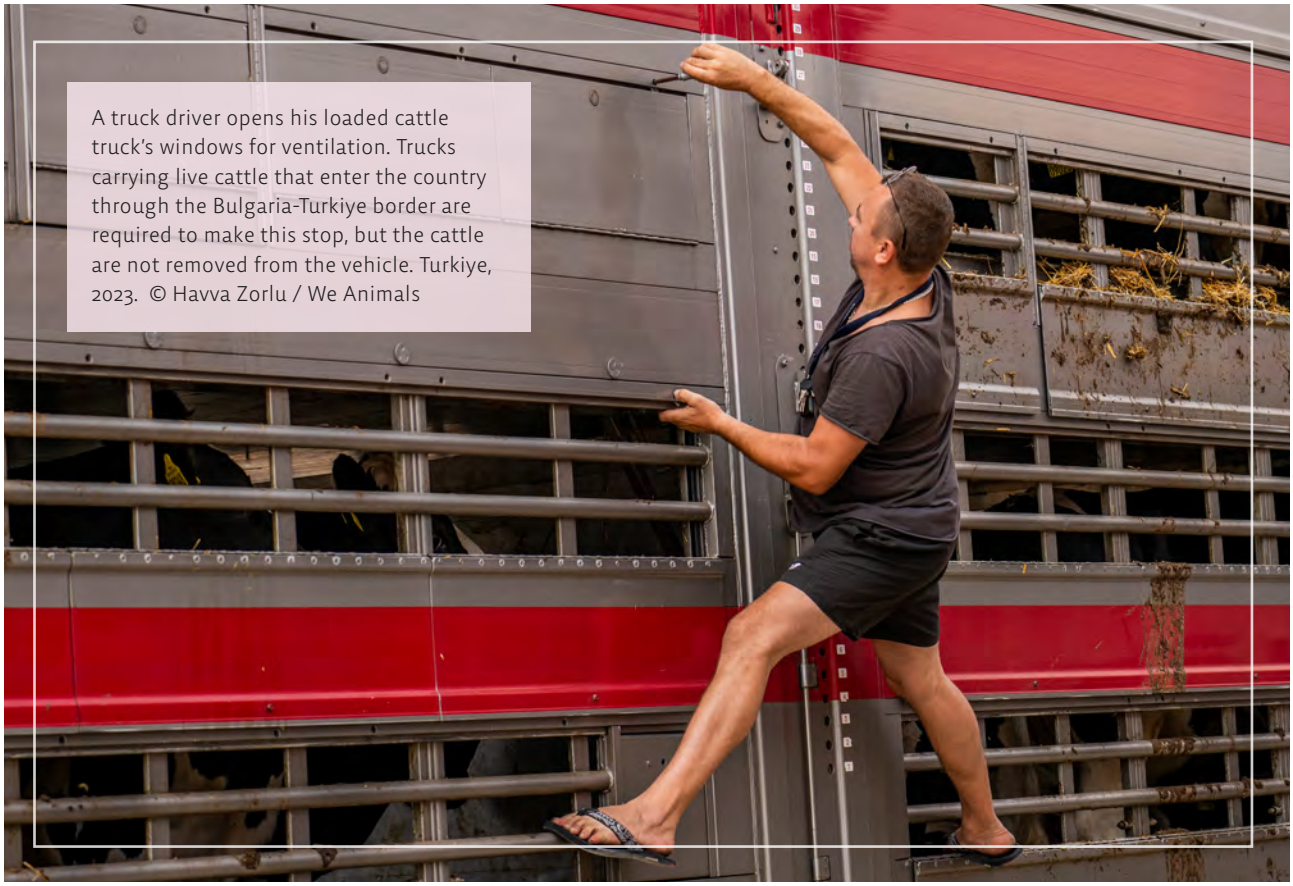
30 European Food Safety Authority (2022). Welfare of equidae during transport, EFSA Journal 20(9). https://doi.org/10.2903/j.efsa.2022.7444.

31 European Food Safety Authority (2022). Welfare of pigs during transport, EFSA Journal 20(9). https://doi.org/10.2903/j.efsa.2022.7445.

32 European Food Safety Authority (2022). Welfare of small ruminants during transport, EFSA Journal 20(9). https://doi.org/10.2903/j.efsa.2022.7404.

33 European Food Safety Authority (2022). Welfare of domestic birds and rabbits transported in containers, EFSA Journal 20(9). https://doi.org/10.2903/j.efsa.2022.7441.

34 Point 94, European Parliament recommendation of 20 January 2022 to the Council and the Commission following the investigation of alleged contraventions and maladministration in the application of Union law in relation to the protection of animals during transport within and outside the Union (2021/2736(RSP)).



A truck driver opens his loaded cattle truck's windows for ventilation. Trucks carrying live cattle that enter the country through the Bulgaria-Turkiye border are required to make this stop, but the cattle are not removed from the vehicle. Turkiye, 2023. © Havva Zorlu / We Animals

poultry and rabbits, based on the latest available science, while acknowledging space allowance as a major factor for the welfare of animals during transport.

These findings proved very divisive in the European Parliament negotiations. Concerns were raised about the economic impact of expanding space allowances, sometimes framed as animal welfare considerations – for example, claims that animals might fall and get injured during transport more if given more space on board. However, EFSA found that cattle and sheep are at a greater risk of stress and injuries at low space allowances, rather than high ones. Insufficient space impedes animals' ability to properly balance and adjust their posture to acceleration and transit in general, while higher space allowance is linked to a lower rate of loss of balance and lower indicators of bruising. As such, recommendations by EFSA, accounting for the risk of too high or low stocking, are designed to improve, not compromise, animal welfare.

It is worth noting that only a few years earlier, in 2022, the European Parliament itself advocated for stocking densities to be guided by the most recent scientific knowledge and the species-specific needs of animals.[35]

35 Point 53, European Parliament recommendation of 20 January 2022 to the Council and the Commission following the investigation of alleged contraventions and maladministration in the application of Union law in relation to the protection of animals during transport within and outside the Union (2021/2736(RSP)).

1.2 Fitness for Transport

Fitness for transport has long been recognised as a problematic area. The definition provided under the Animal Transport Regulation does little to support effective enforcement, as it omits key indicators of unfitness from its exhaustive list and relies on vague language. For example, the European Commission's own study confirmed that a lack of understanding or different interpretations of the definition of an "unfit" dairy cow contributes to these animals being transported when they ought not to be.[36] Generally, the transport of unfit animals continues to be one of the most commonly reported breaches of the Animal Transport Regulation during official controls.[37] EPRS further found that the absence of deterrent sanctions continue to promote non-compliance in this area. This creates a situation where it is often cheaper for operators to pay fines than to cover the costs of ensuring animals are fit for transport.[38]

Certain groups of animals face heightened risks in relation to proper assessment of their fitness for transport, including pregnant, post-partum, and end-of-exploitation animals. For the former, EPRS noted that the assessment of the pregnancy stage might not always be accurate, which runs the risk that animals are transported beyond the stage allowed by law. For that reason, the confirmation of the pregnancy stage before transport is commenced is essential and can be easily known if documentation containing the date of insemination or mating is provided.[39] There remains a knowledge gap regarding the exact stage of pregnancy beyond which transport should not be transported. However, the recommended best practice under New Zealand's Code of Welfare is not to transport animals in the last third of their pregnancy.[40] Similar recommendations can be found for pregnant pigs in the EU under the Animal Transport Guides Project.[41]

The European Parliament has also emphasized the need to act on the transport of unweaned calves, an especially vulnerable category of animals.[42] According to EPRS's 2021 study, millions of young unweaned calves – typically those born in the dairy industry, where they are considered by-products unless kept for replacement – are transported while experiencing a so-called "immunological gap," when their bodies shift between passive and active immunity. As a result, their welfare and health are severely compromised.[43] Based on the latest available science, EFSA recommends that calves should only be considered fit for transport when they are at least 5 weeks old and weigh at least 50 kg.[44]

36 European Commission (2022). Study on economic models to prevent the transport of unfit end-of-career dairy cows, Publications Office of the European Union. https://data.europa.eu/doi/10.2875/70926.

37 European Court of Auditors (2023). Transport of live animals in the EU – Challenges and opportunities, Publications Office of the European Union. https://data.europa.eu/doi/10.2865/211704.

38 European Parliament: Directorate-General for Parliamentary Research Services (2025). Animal welfare during transport – Update on the implementation of Council Regulation (EC) No 1/2005, Publications Office of the European Union, https://data.europa.eu/doi/10.2861/8758557.

39 European Parliament: Directorate-General for Internal Policies of the Union (2021). Particular welfare needs in animal transport – Unweaned animals and pregnant females. https://data.europa.eu/doi/10.2861/28562.

40 New Zealand Government, Code of Welfare: Transport within New Zealand, Issued under the Animal Welfare Act 1999. Available at: https://www.mpi.govt.nz/animals/animal-welfare/codes/all-animal-welfare-codes/transport-within-new-zealand/.

41 Consortium of the Animal Transport Guides Project (2017, revised 2018). Guide to good practices for the transport of pigs. Available at: https://food.ec.europa.eu/animals/animal-welfare/eu-animal-welfare-legislation/animal-welfare-during-transport/animal-transport-guides_en.

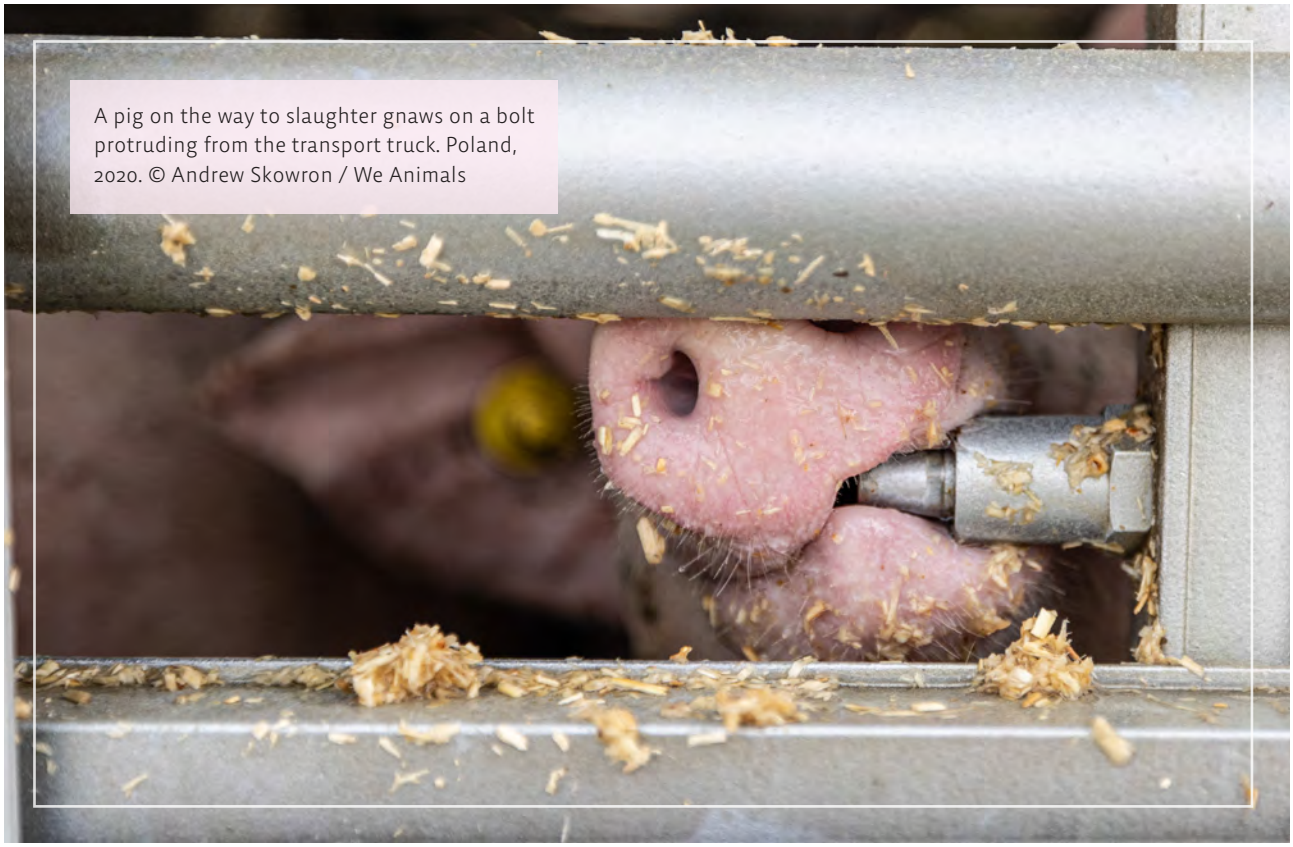
42 Points 102-104, European Parliament recommendation of 20 January 2022 to the Council and the Commission following the investigation of alleged contraventions and maladministration in the application of Union law in relation to the protection of animals during transport within and outside the Union (2021/2736(RSP)).

43 European Parliament: Directorate-General for Internal Policies of the Union (2021). Particular welfare needs in

1.3 Sea Transport

Around three million animals are exported from the EU to third countries by sea each year.[45] During these sea journeys, animals are exposed to a range of additional hazards, including harsh microclimatic conditions during the waiting time in ports and during transit, starvation, the stress of sea motion, and poor post-journey handling.[46] The exact conditions on board are rarely known and the number of animals that die before reaching the destination is not reported.[47] Despite these risks, sea transport usually enjoys the benefit of the doubt from policymakers, and its animal welfare implications are largely overlooked. That is reflected, for example, in the fact that the legally binding limits on journey times do not apply to journeys by sea. Nevertheless, the European Parliament has called for measures enabling a shift to a meat, carcasses, and genetic material trade, where appropriate, that could replace the need for sea transport.[48]

Alarmingly, the livestock vessels that carry animals on sea journeys that can last up to several weeks perform extremely poorly against international standards. A 2024 report assessing 64 livestock vessels approved in the EU found that the average livestock vessel is 43 years old and had been detained five times,



A pig on the way to slaughter gnaws on a bolt protruding from the transport truck. Poland, 2020. © Andrew Skowron / We Animals

animal transport – Unweaned animals and pregnant females. https://data.europa.eu/doi/10.2861/28562.

44 European Food Safety Authority (2022). Welfare of cattle during transport, EFSA Journal 20(9). https://doi.org/10.2903/j.efsa.2022.7442.

45 European Commission (2020). Welfare of animals exported by sea – Overview report, Publications Office of the European Union, https://data.europa.eu/doi/10.2875/47273.

46 European Food Safety Authority (2022). Welfare of cattle during transport, EFSA Journal 20(9). https://doi.org/10.2903/j.efsa.2022.7442.

47 European Parliament: Directorate-General for Internal Policies of the Union (2021). Animal welfare on sea vessels and criteria for approval of livestock authorisation – Workshop on animal welfare during transport of 25 May 2021 – Research for ANIT Committee. https://data.europa.eu/doi/10.2861/014626.

48 Point 117, European Parliament recommendation of 20 January

and that half the ships were sailing under black flags, which designate countries with poor safety and compliance records. Twenty-four of the vessels had suffered major incidents during their operational life, and 15 were identified as high-risk.[49] Given that these vessels carry live animals, a 2021 study for the ANIT Committee stressed that only white-flagged vessels classed by the highest performing societies should be allowed to carry live cargo. It further recommended that livestock vessels should be approved by qualified experts, particularly a team consisting of a marine surveyor, marine technician, veterinarian, and behaviourist, and that a veterinarian be present on board for each sea leg of the journey to provide proper veterinary care and to humanely euthanise animals that are too sick or injured to continue the journey.[50]

1.4 Export to Third Countries

Major EU trade partners for the export of live mammals include Libya, Jordan, Israel, Saudi Arabia, Lebanon, and Turkey.[51] Most of these export destinations have a poor track record when it comes to animal welfare. For example, the Bavarian State Ministry for the Environment and Consumer Protection lists Libya, Lebanon, and Turkey as high-risk countries in this regard.[52] Although the Court of Justice of the EU (CJEU) ruling in Case C-424/13 (Zuchtvieh) confirms that the Animal Transport Regulation applies to the entirety of transport, including up to the place of destination even when placed in a third country,[53] the European Parliament has acknowledged in its recommendations that no control systems exist once animals leave EU territory.[54] This leaves animals in a legal vacuum, where their protection cannot be effectively guaranteed, as the EU's enforcement powers beyond its territory are extremely limited.

Beyond concerns about the treatment of animals in export destinations with low or virtually non-existent animal welfare standards, the journey itself poses a major challenge for animals. Transport to third countries is typically lengthy, prolonged by administrative procedures at border crossings, even when all documentation is in order. For instance, the border between Bulgaria and Turkey is the second busiest in the world, with wait times routinely lasting several hours, and delays can become far longer if issues with documentation arise.[55] EU law does not require animals to be immediately returned to their place of departure if they are refused entry at the border – for example, due to animal health concerns. As a result, incidents such as the 69 pregnant cows stranded for weeks at the Turkish Kapıkule border in 2024 – suffering terribly in deteriorating conditions[56] documented by ZDF – continue to occur.

2022 to the Council and the Commission following the investigation of alleged contraventions and maladministration in the application of Union law in relation to the protection of animals during transport within and outside the Union (2021/2736(RSP)).

49 Robin des Bois, Animal Welfare Foundation e.V. (2024). 64 EU-approved livestock carriers. Available at: https://www.animal-welfare-foundation.org/en/blog/die-gefaehrlichsten-schiffe-der-welt.

50 European Parliament: Directorate-General for Internal Policies of the Union (2021). Animal welfare on sea vessels and criteria for approval of livestock authorisation – Workshop on animal welfare during transport of 25 May 2021 – Research for ANIT Committee. https://data.europa.eu/doi/10.2861/014626.

51 European Parliament: Directorate-General for Internal Policies of the Union (2021). Patterns of livestock transport in the EU and to third countries – Research for ANIT Committee. https://data.europa.eu/doi/10.2861/400742.

52 Bayerisches Staatsministerium für Umwelt und Verbraucherschutz. Tiertransporte in Drittstaaten. Available at: https://www.stmuv.bayern.de/themen/tiergesundheit_tierschutz/tierschutz/tiertransporte_drittstaaten/index.htm (last accessed 1 September 2025)

53 Judgement of the Court of 23 April 2015 in Case C-424/13, Zuchtvieh-Export GmbH v Stadt Kempten, ECLI:EU:C:2015:259.

54 Point 132, European Parliament recommendation of 20 January 2022 to the Council and the Commission following the investigation of alleged contraventions and maladministration in the application of Union law in relation to the protection of animals during transport within and outside the Union (2021/2736(RSP)).

A turkey flaps as a worker aggressively throws them into a transport truck. Poland, 2020. © Human Cruelties / We Animals

There is growing evidence that replacing live animal exports with the export of meat, carcasses, and genetic material could deliver not only animal welfare improvements, but also environmental and economic benefits, while aligning more closely with societal expectations. A 2023 study comparing the live sheep trade with carcass trade between Portugal and Israel found that carcass trade offers significant advantages across all these dimensions. Live animal transport requires significantly more resources and involves multiple stages, making the process inefficient, unnecessarily extending the supply chain, additionally burdening officials and imposing suffering on animals. For example, on the aforementioned route, the trade is nine days longer when live animals are transported.[57]

1.5 Member-State Level Enforcement

The Animal Transport Regulation fails to set a common framework for key aspects that ensure effective enforcement of the rules, including training (whose length and level differs widely across the EU), the number of on-the-road checks, or sanctions imposed for non-compliance. Therefore, detailed provisions to harmonize the system across the bloc are urgently necessary.

55 European Parliament (2021). Patterns of livestock transport in the EU and to third countries – Research for ANIT Committee. https://data.europa.eu/doi/10.2861/400742.

56 Animal Welfare Foundation (2024). Tragic end for pregnant cattle at Turkish border. Available at: https://www.animal-welfare-foundation.org/en/blog/kapikule.

57 Human Behaviour Change for Life (2023). The Business Case: the benefits of a carcass over a live animal trade. Eurogroup for Animals. Available at: https://www.eurogroupforanimals.org/library/business-case-benefitscarcass-over-live-animal-trade.

In its report, ECA found that one avenue to improve enforcement is to harness the potential of digitalization and digital tools (e.g., video surveillance, GPS or other technologies) to better monitor transports.[58] At this moment, the Animal Transport Regulation does not establish an EU-wide collection of data on live animal transport, nor a central database of authorized transporters. Member States are not required to collect data on domestic transport nor to record data of animal exports to third countries in TRACES (unless animals pass through another Member State). As a result, data collection across the EU is scattered and inconsistent and creates difficulties for monitoring and analyzing systemic breaches of the rules, thereby complicating enforcement at national level.

EPRS further confirmed that the level of compliance across the EU remains low, with 40% of inspections revealing breaches of the Animal Transport Regulation. Ineffective control systems, insufficiently harmonized training, low penalties, and poor monitoring and data recording continue to undermine animal welfare during transport.[59]

In response to this gap, EPRS recommends a legislative revision to strengthen the rules through clearer definitions, legally binding technical requirements, and standardized documentation and monitoring procedures.[60] Stronger controls and data recording, stricter sanctions, and harmonized enforcement would help address existing regulatory discrepancies. ECA also noted that the fact that animal welfare is not reflected in the cost of transport and price of meat poses a challenge, and a methodology to assign monetary value to animal suffering could create incentives for compliance and encourage companies to adopt higher animal welfare standards.[61]

Crucially, during a hearing in the European Parliament, the EPRS emphasized that merely improving enforcement of the Animal Transport Regulation would not be sufficient to reduce animal suffering, as the legislation itself is too weak to ensure animal welfare.[62] To improve conditions, new regulatory standards based on scientific findings in the field of animal welfare are therefore required.

58 European Court of Auditors (2023). Transport of live animals in the EU – Challenges and opportunities, Publications Office of the European Union. https://data.europa.eu/doi/10.2865/211704.

59 European Parliament: Directorate-General for Parliamentary Research Services (2025). Animal welfare during transport – Update on the implementation of Council Regulation (EC) No 1/2005, Publications Office of the European Union, https://data.europa.eu/doi/10.2861/8758557.

60 *Ibid*.

61 European Court of Auditors (2023). Transport of live animals in the EU – Challenges and opportunities, Publications Office of the European Union. https://data.europa.eu/doi/10.2865/211704.

62 Hearing of the joint Committee on Agriculture and Rural Development and Committee on Transport, 8 April 2025.

Thirsty cattle are given temporary reprieve at a rest station at the Bulgarian-Turkish border, Edirne Province (East Thrace), Turkiye, 2018. © Jo-Anne McArthur / Eyes On Animals / We Animals

2. Adopting Legislation for the Future, not the Past

The revised Animal Transport Regulation must learn from the mistakes of its predecessors. Importantly, it must be designed to withstand the test of time, considering that we can expect this piece of legislation to remain applicable for at least a decade, if not longer. Therefore, the key principles guiding this revision should ensure that the adopted act is:

Future-proof

- The EU has changed profoundly since 2005, when the existing Animal Transport Regulation was adopted, and the pace of change is only accelerating. Rising temperatures, driven by the climate crisis, are already making transport conditions more challenging for animals, and this trend is expected to intensify – especially considering that the EU is the fastest-warming continent.[63] Moreover, the expectations of EU citizens on the treatment of animals in human care keep evolving as well. The revision must therefore be future-proof: it must ensure that animals receive adequate protection not only under today's lens, but also in the face of the climatic and social realities of the next 10 to 15 years.

Grounded in evidence-based recommendations

- Although animals are the primary subjects of live transport, their most basic needs are too often subordinated in favor of economic interests. Article 13 of the Treaty on the Functioning of the European Union recognizes animals as sentient beings and requires policymakers to reflect this in law and policy. Yet, animal welfare is still treated as an afterthought, often seen as an obstacle rather than a goal. The European Commission's proposal to revise the Animal Transport Regulation contains many positive, science-based provisions inspired by EFSA recommendations, but its framework continues to enable practices that will inevitably cause suffering. Attempts to dilute the proposal even further are therefore deeply concerning. In light of emerging challenges, such as rising antimicrobial resistance and the risk of zoonotic diseases, prioritizing the highest possible standards of animal welfare is essential also for public health.

63 European Environment Agency (2024). European climate risk assessment, Publications Office of the European Union, https://doi.org/10.2800/204249.

Enforceable and legally sound

- The revised Regulation must also acknowledge the legal reality of the EU's enforcement limits. Despite the CJEU case law confirming that the Animal Transport Regulation protects animals throughout the whole transport, including the part that takes place outside of the EU territory, the enforcement of EU law outside of its jurisdiction is complicated. The future legislation should therefore set a clear path towards replacing the export of live animals with trade in meat, carcasses, and genetic material, which have been shown to bring economic, ethical, and environmental advantages.

Turkeys sit and stand tightly packed inside crates on a transport truck. Poland, 2020.
© Human Cruelties / We Animals

3. Our Science-Based Recommendations

The revision of animal transport rules in the EU represents a unique opportunity to adopt ambitious legislation to ensure better protection of animals in the world's largest live animal exporting region. Based on the latest scientific advice and on-field findings from investigations of live animal transport, we recommend the following standards:

1. **Journey times** must be as short as possible, with transport to slaughter not exceeding 9 hours.

   - **Species- and category-specific provisions** must be adopted for animals transported in containers and vulnerable groups of animals, such as unweaned, pregnant, and end-of-exploitation animals.
   - Considering the additional challenges of **sea transport**, journey time limits must apply to any sea leg of the transport as well.

2. **Temperature** that animals experience during the entirety of the transport must remain between 5°C and 25°C, with species- and category-specific limits applying. Both temperature and humidity must be continuously monitored throughout the whole journey.

3. **Detailed and species-specific indicators** for assessing **fitness for transport** must be adopted.

   - **Harmonized training requirements** must ensure that personnel responsible for handling and transporting have sufficient knowledge to properly assess fitness for transport.

4. **Unweaned animals**, including calves under 5 weeks of age and 50 kilograms of weight, and pregnant animals if two-thirds of the expected gestation duration has already passed, must not be transported. The **date of insemination or mating** to ascertain the pregnancy stage must be provided.

A chicken looks out from a crowded transport crate. Poland, 2016. © Andrew Skowron / We Animals

5 **Space allowance** must follow EFSA recommendations, as it must account for factors such as animals' ability to adjust their position, eat, drink, and thermoregulate.

6 An **EU-wide action plan** to **phase out live animal transport** must be adopted, shifting progressively toward the transport of meat, carcasses, and genetic material.

- In the interim, necessary provisions to mitigate tragedies on roads and at sea must be safeguarded, including only allowing **white-flag vessels** for animal transport by sea and an immediate **mandatory return of consignments** refused entry in third countries.
- The action plan should include a **blacklist of countries** with considerably lower animal welfare standards and heightened risk of animal welfare violations, which would be a priority for the earliest possible **export phase-out**.

7 The **scope** of the Regulation must cover all aquatic animals, as well as transport of species protected under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), removing the proposed exemptions.

8 A **clear timeframe** must be set for mandatory adoption of delegated acts by the European Commission on areas listed in Article 47, following publication of EFSA's scientific findings.

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