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Open Letter

to EU Commissioner for Animal Welfare, Olivér Várhelyi

Rethinking Animal Transport: The Spiridon II Disaster Exposes the Failures of
Global Live Animal Transport – and Why Chilled Meat Transport Is Urgently
Needed

Dear Commissioner Várhelyi,

The ongoing catastrophe involving nearly 3,000 cattle from Uruguay (a significant number of them pregnant) aboard the Spiridon II is neither an isolated incident nor the result of a single third country's failure. It is a symptom of a global system in which animals are shipped across continents under conditions that are fundamentally incompatible with Europe's core values.

Even though the animals in this tragedy did not originate from the EU, the case clearly demonstrates how live exports by sea foster severe animal suffering and lead to unmanageable and unacceptable welfare breaches.

Europe is not uninvolved: live animal transport by sea is incompatible with European animal-welfare principles and with any notion of responsible animal husbandry. Moreover, under the pretext of "herd building," EU Member States continue to circumvent the export ban for slaughter animals to third countries. Investigations by NGOs, including the investigative platform The Marker, which tracked transports as far as Algeria, have shown that EU Member States continue to export live animals to destinations where even basic slaughter-standards equivalent to European minimum requirements do not exist.

The ongoing revision of the EU Transport Regulation presents a historic opportunity to correct these systemic failings and to define Europe's responsibility more clearly. Meaningful animal welfare is only possible if Europe ensures that animals born and raised within the Union do not end up in systems that contradict our standards.



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We therefore respectfully submit the following proposals for a responsible, transparent and enforceable animal-transport policy in line with European values:

1. Transition from live exports by sea to chilled-meat transport

Current scientific assessments identify live sea transport as particularly harmful to animal welfare: EFSA and subsequent analyses list additional stressors such as heat and cold stress, motion stress caused by rough seas, insufficient feed and water supply, high concentrations of harmful gases and severely limited animal supervision on board.

Eurogroup for Animals and other organisations have documented, for years, repeated disasters involving thousands of stranded, dying, or dead animals at sea. They explicitly recommend replacing live exports step by step with trade in meat and carcasses.

A complete shift from slaughter-animal exports to chilled-meat transport ensures that European animals remain within a controlled system: hygiene standards, transport conditions, temperature management and traceability are far easier to monitor in chilled-meat supply chains than in live animals shipped by sea. It would also prevent animals from becoming “stranded” in ports or third countries and suffering for weeks under unbearable conditions.

2. Compliance with WOAHP standards as a mandatory prerequisite for bilateral agreements

The World Organisation for Animal Health (WOAH, formerly OIE) establishes international reference standards in its Terrestrial Animal Health Code, including animal-welfare requirements for slaughter (e.g. Chapter 7.5 on bleeding procedures).

Making compliance with WOAHP standards a binding precondition in all bilateral trade agreements with third countries receiving EU live exports would ensure that exported animals are guaranteed at least a minimum level of protection.

3. Verifiable herd-building requirements for all breeding-animal exports

Investigations by NGOs repeatedly show that so-called “breeding” exports are, in practice, often slaughter exports: animals declared as breeding stock are slaughtered shortly after arrival in third countries. WOAHP standards simultaneously emphasise that identification and traceability are essential components of responsible animal trade.

Therefore, mandatory herd-building protocols must be introduced for all breeding-animal exports: within two years (for existing agreements within one year), importers must document and prove the integration of animals into breeding programmes through herd registers, reproduction data, and on-site stable inspections. Where such proof cannot be established, all further exports to that country must be automatically suspended. Only this prevents the misuse of the “breeding-animal” label as a loophole for de-facto slaughter exports.



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4. Mandatory maximum of two hours for clearance at EU external borders

EFSA and numerous scientific studies show that welfare impacts such as thermal stress, dehydration, exhaustion, injuries and fear increase significantly with transport duration and waiting time.

The EU already states that animals must not be held at control points “longer than necessary.” A legally defined upper limit of two hours for veterinary and customs checks at EU external borders is therefore essential to prevent avoidable delays.

5. Binding emergency-care obligations

Where delays exceeding two hours are unavoidable—such as technical failures, extreme weather, port closures or political disruptions—robust, contractually binding emergency plans must be activated, including: unloading and rest areas, ventilation and non-slip flooring, access to water and feed, and veterinary care.

Repeated documentation of animals stranded for hours or days in ports or border areas clearly shows the widespread absence of such infrastructure. Emergency-care requirements must therefore become explicit prerequisites in all bilateral agreements with third countries and must be regularly audited.

6. Enforcement of EU transport law beyond EU territory

The European Court of Justice clarified in Case C-424/13 that the EU Transport Regulation (EC) No 1/2005 applies to the entire planned journey—including segments outside the EU. In practice, however, this requirement is frequently ignored: NGOs and technical reports systematically document that transports continue under conditions that contradict the Regulation, without consequences for companies or competent authorities.

A credible European transport policy must therefore ensure that:

- transport authorisations are granted only when compliance with EU standards is guaranteed along the entire route, including the destination;
- EU authorities systematically evaluate data from inspection reports, TRACES and NGO documentation, withdrawing transport authorisations and blocking ports or routes in the event of violations;
- repeat offenders face severe sanctions and withdrawal of licences.



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As a general rule: if EU animal-welfare requirements during transport cannot be meaningfully monitored and enforced, live exports by sea to third countries must be prohibited.

As long as the EU cannot ensure that third countries respect European minimum standards, live-animal transports must not take place. The Spiridon II disaster illustrates what happens when chains of responsibility collapse and animals become hostages of opaque bureaucratic processes.

Dear Commissioner Várhelyi,

You have the opportunity to reset Europe's commitment to responsibility and animal welfare. This decision lies in your hands and will have an immediate impact on the lives of millions of animals.

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Mag.a Dr.in Madeleine Petrovic, President
Vösendorf, 20th November 2025



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Sources:

EFSA Panel on Animal Health and Welfare (AHAW). Welfare of cattle during transport. EFSA Journal 2022;20(9):7442. DOI: 10.2903/j.efsa.2022.7442. Volltext: <https://www.efsa.europa.eu/en/efsajournal/pub/7442>

EFSA. More space, lower temperatures, shorter journeys: EFSA recommendations to improve animal welfare during transport. 2022. <https://www.efsa.europa.eu/en/news/more-space-lower-temperatures-shorter-journeys-efsa-recommendations-improve-animal-welfare>

Eurogroup for Animals & CIWF u.a. True horror of EU live animal transport exposed. 28.11.2023. <https://www.eurogroupforanimals.org/news/true-horror-eu-live-animal-transport-masked-official-records>

Animal Welfare Foundation, Eurogroup for Animals u.a. 8,000 animals stranded at sea: our latest investigation. 17.03.2022. <https://www.animal-welfare-foundation.org/en/blog/8000-animals-stranded-at-sea-eurogroup-for-animals-reports-on-our-latest-investigation>

WOAH (World Organisation for Animal Health). Terrestrial Animal Health Code – insbesondere Kapitel 7.5 „Slaughter of animals“. <https://www.woah.org/en/what-we-do/standards/codes-and-manuals/>

EuGH. Urteil vom 23. April 2015, C-424/13, Zuchtvieh-Export GmbH / Stadt Kempten. Volltext: <https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX:62013CJ0424>

FOUR PAWS (Vier Pfoten). Position paper on live animal transport. 2024. https://media.4-paws.org/f/8/2/9/f829507a457eb86d0b8603d06cc53def22f49c0f/2024-04_position-paper_live-transport-WEB.pdf

Study for the European Parliament: Update on the implementation of Council Regulation (EC) No 1/2005. 2025. [https://www.europarl.europa.eu/RegData/etudes/STUD/2025/765766/EPRS_STU\(2025\)765766_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2025/765766/EPRS_STU(2025)765766_EN.pdf)

The Marker, Investigativrecherche zu Rinderexporten ins nördliche Afrika, u.a. nach Algerien https://www.ots.at/presseaussendung/OTS_20250629_OTS0011/system-ohne-verantwortliche-neue-recherche-zeigt-wie-kaelber-aus-oesterreich-in-nordafrikanischen-schlachthoefen-enden