



Revision of the EU legislation on animal welfare

Executive Summary:

ECSCA advocates for and welcomes a revision of the rules regarding the transportation of livestock that safeguards the welfare of animals, prevents accidents, safeguards the competitiveness of European-owned ships carrying live animals ('livestock carriers') and raises the international operational standards.

European shipping calls for:

- **Strengthening the classification requirements for livestock carriers**
- **Strengthening the technical standards for livestock carriers**

Introduction

The European Community Shipowners' Associations (ECSCA), which represents the interests of the European shipping industry, welcomes the publication of the Commission's proposal for a Regulation on the protection of animals during transport. ECSCA's membership operates in the vast majority of shipping segments and includes shipowners and operators of livestock carriers.

ECSCA's comments on proposed measures on welfare of animals during transport

ECSCA strongly welcomes the Commission's approach to live animal exports as it focuses on the objective of raising operational standards for long-distance transport.

ECSCA's memberships operate several younger, purpose-built or extensively converted livestock carriers which are flying a reputable flag, are classed by a reputable classification society, with a special 'livestock carrier' notation and have been performing very well during port state control inspections throughout the years. In order to ensure similar high standards for all livestock carriers exporting live animals from the EU, ECSCA wishes to put forward the following recommendations:

1. Strengthening the classification requirements for livestock carriers

ECSCA calls for stronger classifications requirements for livestock carriers to assure the highest safety and welfare standards when exporting live animals from the EU. Therefore, in order to gain a certificate of approval from an EU Member State's competent authority or body designated by a Member State to operate in the EU, a livestock carrier should be required to be classed by a classification which is a full member of the International Association of Classification Societies (IACS). Classification of livestock carriers outside of IACS's membership is often used by ship operators that have problems maintaining their ship's standards or who are not willing to pay for the cost of transporting livestock by sea in a humane way. In addition to endangering animal welfare, this results in an uneven playing field.



It is important to note that IACS members, in their role as Recognised Organisations under EU Regulation 391/2009 (article 4), are subject to an additional level of oversight¹ at EU and Member State level.

Furthermore, stronger requirements need to be coupled with harmonised implementation and holistic controls of livestock carriers at Member States to ensure effective implementation and to maintain a level playing field.

2. Strengthening the technical standards for livestock carriers

Along with an IACS classification, properly constructed livestock carriers with a well-designed interior is key to ensuring good journeys. ECSA believes that more effort is needed to ensure all livestock carriers exporting live animals from the EU operate at the highest standard so that time at sea can continue to be considered rest time for the animals. Livestock carriers require several unique features that are fundamental to the humane transport of livestock by sea (e.g. ventilation, drainage, power back-up systems, fresh-water supply and design of pens). Currently, ECSA members' operators carry i.e. proper back-up systems, ventilation and a freshwater supply as minimum technical features. We believe such standards should be introduced and enforced for all livestock carriers exporting live animals from the EU.

Conclusions

ECSA believes that if the steps above are taken, the welfare of EU animals during transport by sea can be ensured. Best practice experience shows that it is possible to continue to transport livestock by sea in a safe and humane manner, with ships classed by a classification which is a full member of IACS, designed in accordance with relevant regulatory requirements for livestock vessels and manned by an experienced crew. In conclusion, ECSA looks forward to contributing to the debate on the future of the transport of livestock by sea by sharing best practice experiences and frontrunner knowhow. Only with a solid dialogue with the sector can we ensure that the future of livestock transport by sea is humane and safe.

For further information:

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¹ <https://www.emsa.europa.eu/inspections/assessment-of-classification-societies/items.html?cid=90&id=496>



Background Information

Loading and inspection of an EU-flagged livestock vessel

- Video from the Irish Department of Agriculture made a video in 2018, including the inspection and loading of an EU-flagged livestock vessel (at 5:17): <https://vimeo.com/264055238/d917537863>

Examples proving the need for a universal requirement of Cargo Certification

- One example of the inadequate national inspections is the Palau-flagged Queen Hind, which capsized and sank only a few hundred meters away from the wharf in Romania in 2020, leading to the deaths of 14.000+ sheep. The ship had an extra deck for animals that caused overloading. Gabriel Paun, of Animals International, said: "Romanian authorities are not to be trusted because this vessel has been inspected by the Romanian government [and] they've missed the extra decks which were not in the cargo plan."
- Another example is the Panamanian-flagged ship Jawan. The Australian Maritime Safety Authority (AMSA) revoked the Australian Certificate for the Carriage of Livestock (ACCL) for the Panamanian-flagged livestock carrier, MV Jawan, because the vessel's approved stability data could not be verified. Two months prior, the ship began rolling dangerously just after berth with more than 4.300 cattle.

Data on animal welfare during transport under current EU legislation

- Looking at the last five years on the EU-flagged livestock vessel Alondra ([Corral Line](#)), the mortality rate for cattle has been 0.087 – 0.148 % and 0.113 – 0.229 % for sheep. The longest voyages are from USA and amount to 31 days, while the shortest voyages are from France and amount to 2 days.
- In studies by the Irish research facility [TEAGASC](#) concerning transport of bovines to Italy, Spain and Lebanon, transport had no adverse effect on animal welfare based on the physiological, haematological and immunological measurements. This goes to show that, under the right conditions, it is entirely possible to uphold animal welfare during transport. It is the conditions during transport that are important, not how long or how far the animal travels.

Background

- Parliament's inquiry, set up in [June 2020](#) to investigate alleged violations of EU animal transport rules, concluded that EU provisions in this area are not always complied with in Member States and do not fully consider the different needs of various animal species. In January 2022, MEPs called on the Commission and EU countries to revise the EU-rules based on the inquiry's conclusions. This included a recommendation to restrict journey time heavily, ensure comfort and stop live animal export to non-EU countries.
- On 17 February 2023, the Commission adopted an [implementing and a delegated act](#) intended to remedy the issues by primarily addressing administrative gaps. This includes stipulating that vessels must be inspected by a team of experts – an official veterinarian and a maritime expert – though with no increase in the thoroughness of the inspections.