



26 January 2024

**Please reply to:**

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Siegfried Moder  
President  
Federation of Veterinarians of Europe

Mark McCarthy  
President  
European Association of State Veterinary Officers

Dear Presidents

### **The role of veterinarians in the export of live farm animals to non-EU countries**

We are writing to urge veterinarians, especially state veterinary officers, to play a leading role in pressing the EU Member State authorities to end the export of farm animals on long distances to non-EU countries where often they are slaughtered in ways that would be illegal in the EU.

I would be grateful if we could meet you to discuss our thinking.

One of the authors of this letter, Peter Stevenson, used to work as a lawyer in local government and so is aware of the pressures faced by professional people working in government.

Some Official Veterinarians (OVs) are required to inspect the health status of animals destined for export and sign export health certificates or stamp journey logs. In doing so, OVs are making it possible for animals to be sent on extremely long journeys to countries in the Middle East, North Africa and Turkey<sup>1</sup> where slaughter conditions entail immense suffering for the animals involved. As will be explained below, the main problems are not to do with the lack of stunning.

In carrying out these functions, state veterinarians are sometimes put in a difficult position as their contractual obligation to their employer may conflict with their ethical obligation to safeguard the well-being of animals.

We urge the veterinary profession to begin a dialogue with relevant competent authorities explaining that requiring official veterinarians to facilitate the export of animals to non-EU countries can be incompatible with their ethical obligation to protect the welfare of animals.

The FVE clearly recognises the welfare problems involved in very long journeys. The *FVE's input for the Revision of the Transport Regulation: 10 points*<sup>2</sup> states:

- “Animals should be transported as little as possible, reared as close as possible to the premises on which they are born and slaughtered as close as possible to the point of production.”
- “As a principle, long journeys (more than an 8-hour journey from start to final destination) should be avoided for all animals.”
- “Transport of animals on long journeys by sea vessels must be phased out.” The vast majority of EU animals exported to the Middle East and North Africa are transported on sea vessels.
- “No animal should be knowingly exported to a destination with unidentified welfare standards or exported to be raised in systems banned in the EU due to welfare considerations.” We hope this principle would also apply to animals exported to be slaughtered in ways banned in the EU due to welfare considerations.

The Commission's proposed new Transport Regulation will, if adopted without being diluted and if enforced, lead to some marginal welfare improvements but will not halt exports to non-EU countries nor substantially reduce the number of animals involved.

### **Inhumane slaughter in country of destination**

Exported animals sent to the Middle East, North Africa and Turkey are slaughtered in an inhumane manner. For 30 years television programmes and films shot by animal welfare organisations have shown inhumane slaughter methods are the norm in these regions.<sup>3</sup> Most of the problems are unrelated to slaughter according to religious beliefs. Most of the suffering arises because of inhumane handling and throat-cutting methods that have nothing to do with religious requirements. When Muslims see our films they are horrified and say ‘this is not Halal’.

EU animals are sometimes slaughtered on the pavement outside butchers' shops in the Middle East. In Egypt and other countries slaughtermen routinely control cattle by severing their leg tendons with a knife. Often in this region a chain is tied round the rear leg of cattle. The fully conscious animal is then hoisted up, dangling upside-down from one back leg, ready for slaughter.

Many slaughtermen are too frightened to get close enough to cattle to perform one deep throat cut. Instead the slaughterman stays at arm's length and simply stabs the knife into the neck. The animal bellows in pain and distress and struggles powerfully against the rope which restrains it. Even after several such stabs, the animal remains standing while it slowly bleeds from the neck.

### **Unlawful nature of slaughter methods in country of destination**

The slaughter methods just described are routinely in breach of the international standards on welfare at slaughter of the World Organisation for Animal Health (WOAH).

Religious slaughter without prior stunning is permitted in the EU by Regulation 1099/2009. However, although the Regulation exempts the requirement to stun in the case of slaughter for religious purposes, all the other aspects of the Regulation (e.g. sparing the animals avoidable pain) continue to apply in the case of religious slaughter. The way animals are slaughtered in the Middle East, North Africa and Turkey regularly entails pain, distress and suffering that go far beyond that which would be caused by properly performed non-stun slaughter and would be in breach of Regulation 1099/2009 if carried out in the EU.

Veterinarians should not be involved in sending animals for slaughter in non-EU countries in ways that breach WOAH's international standards, that would be in breach of EU law if performed in the EU, and that are in conflict with the veterinarians' ethical obligation to protect animal welfare.

Yours sincerely

Animals' Angels, Julia Havenstein, Vorsitzende

Animal Welfare Foundation, Maria Boada-Saña DVM, MPS in Animal Law, Project Manager

Compassion in World Farming, Peter Stevenson OBE, Chief Policy Advisor

Ethical Farming Ireland, Caroline Rowley, Director

Eurogroup for Animals, Susanna Blattner DVM, Policy Officer

Eyes on Animals, Lesley Moffat MSc, Director

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<sup>1</sup> CIWF, 2023. A Data Dump of EU Transport Suffering Exposed. <https://www.ciwf.org/resources/reports-position-papers-briefings/a-data-dump-of-eu-transport-suffering-exposed>

<sup>2</sup> FVE, 2022. FVE inputs for the revision of the Transport Regulation: 10 points. <https://fve.org/publications/fve-inputs-for-the-revision-of-the-transport-regulation-10-points/>

<sup>3</sup> For example *The Louder Sound* at <https://www.youtube.com/watch?v=mBa1iz0U-bU&feature=youtu.be> and ZDF programme on 20 November 2018 at <https://www.zdf.de/politik/frontal-21/qualvolle-tiertransporte-100.html>