



12 June 2026

Attention: Dr Botlhe Michael Modisane
South African Representative for the World Organisation for Animal Health

By email:

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Dear Dr Modisane,

RE: WOAHA consultation on draft Chapter 7.2: Animal welfare during transport

We sincerely welcome the World Organisation for Animal Health's (WOAH) revision of its animal transport standards - in particular, the development of a consolidated Chapter 7.2 on '*Animal welfare during transport*'.

We take this opportunity to present a number of recommendations.

We call on you, as the Veterinary Authority representative for South Africa, to use this opportunity to advocate for stronger standards, in line with the growing evidence of animal welfare science* that the long-distance transport of live farmed animals causes pain and suffering.

As we observe positive policy change globally to end the trade - such as a ban on live exports from the United Kingdom and New Zealand, the upcoming ban on sheep exports by sea from Australia and the withdrawal of veterinary export certificates in Germany for several categories of live animals to third countries - we welcome all effective steps to improve welfare, reduce journey lengths and ultimately end this cruel and unsustainable trade.

We therefore call on you, in your role as a WOAH member, to consider the benefits of using this current revision as a critical opportunity to bring the long-distance transport of live animals to an end. Indeed, this is recognised in principle by the current Terrestrial Animal Health Code and the latest draft for consolidated Chapter 7.2 stating that:

**"Longer journeys increase risks to animal welfare" and recommending that
"Journeys should be kept as short as possible."**

We urge that these principles underscore the revisions made for the global standards on the transport of live animals and that you work with the relevant officials within the National Department of Agriculture to replace the trade with alternatives such as meat carcasses.

We call on South Africa to adopt national time-bound commitments to phase out the long-distance transport of live animals.

The welfare problems entailed in long journeys

As highlighted by recent media reports, ships carrying cattle and sheep have been sent to regions affected by conflict as a result of geopolitical dynamics, putting crew and animals at risk of protracted delays, injuries and death.

Most very long journeys are by sea and experience over the years - together with reports by veterinarians - shows that these journeys often involve serious problems for animals. These include large build-ups of faeces and slurry in the animal pens; wet and soiled bedding; dirty water and feed troughs; overcrowding; high temperatures, extreme humidity and inadequate ventilation; injuries, some of which require euthanasia.

Long road journeys, too, are problematic. Particularly when trucks are overcrowded, and temperatures are high, animals can become increasingly exhausted, dehydrated and stressed as the long journeys wear on. Some get injured and collapse onto the floor of the truck, where they risk being trampled by their companions.

Moreover, the long-distance transport of animals in crowded, stressful, hot, unsanitary conditions may undermine their immune system, making them vulnerable to infections, including zoonoses. The animals can transmit these pathogens during the journey, leading to the transboundary spread of diseases and ultimately, pandemics.

Some welfare harms are inherent in long journeys

While strengthened WOAHP recommendations are essential, it is important to note that a [statement by the South African Veterinary Association \(SAVA\)](#) published in April 2026 points out (in relation to proposed South African regulations) that certain welfare harms are *inherent* in long distance transport by sea. SAVA states: “Inherent harms are those that are a fundamental part of every sea voyage. These include the motion of the vessel on the water, challenges inspecting and caring for vast numbers of animals, and the accumulation of excrement and ammonia”.

SAVA concludes: “No amount of regulation is able to prevent the inherent harms associated with live export by sea, with the resultant suffering experienced by the animals on board.” In light of these inherent harms we believe that globally we should move away from the long-distance transport of live farmed animals.

We welcome more Veterinary Associations support this approach through the WOAHP consultation and through public statements in this manner.

WOAHP’s draft new recommendations

We would like to highlight four key recommendations for your consideration, which could help mitigate the worst welfare impacts while efforts continue towards ending long-distance transport.

- **VETERINARY PRESENCE:** A veterinarian should be present and accompanying the animals, on all sea journeys over three days. Without a veterinarian on board, there is no one with appropriate qualifications and expertise to treat injured or sick animals or to tackle disease outbreaks.
- **PROTECTION OF VULNERABLE ANIMALS:** The transport of vulnerable animals should be kept as short as possible. Such animals include gestating females, unweaned animals, and those at the end of their productive lives such as cull cows and sows.

- **NO TRANSPORT WITHOUT CLEAR AUTHORITY:** Some of the most serious welfare problems arise when consignments are rejected by the buyer or refused entry by the importing country. This can lead to animals being stranded at sea for weeks or even months. Accordingly, the competent authority of the exporting country should not permit consignments to leave by sea or road unless they have received from both the buyer and the competent authority of the importing country a signed attestation that they have obtained from the exporter adequate animal health guarantees that comply with the import requirements of the country of destination and the buyer's requirements.
- **VESSELS FIT FOR PURPOSE:** Ships of all types are on average scrapped at 29 years of age. However, many livestock vessels are much older than this and, moreover, were not purpose built to carry live animals. Assuring welfare on such vessels is challenging and converted vessels may have reduced stability and increased capsize risk. Accordingly, vessels over 30 years of age and those converted from other purposes should not be used to carry animals unless a rigorous survey certifies that the vessel is safe and is so constructed and maintained as to enable animals to be carried to WOA's welfare standards e.g. that it has an effective ventilation system.

In conclusion, during the current revision of its recommendations on animal transport, we respectfully urge you to actively engage with the consultation process to strengthen the WOA's global guidance for animal transport, and to work nationally to replace the live export trade with alternatives such as meat carcasses.

This is crucial to further improve animal welfare, reduce disease risk and end the transport of animals to conflict-affected regions, and countries that repeatedly fail to enforce animal welfare legislation.

Such revisions should be an urgent step towards ending the long-distance transport of live farmed animals globally and replacing it with the transport of carcasses, meat, milk powder and genetic material.

Yours Sincerely,

Karen de Klerk





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Member of the Cape Animal Welfare Forum and the Farmed Animal Alliance



The following South African animal protection partners endorse this letter:



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1. European Food Safety Authority (EFSA), [Welfare of cattle during transport](#), EFSA Journal (2022)
2. EFSA Plain Language Summary – [Welfare of cattle during transport](#)
3. EURCAW summary of [EFSA Scientific Opinion](#)
4. WOAHEurope [summary of EFSA transport findings](#)
5. Earley B, Buckham Sporer K, Gupta S. [Relationship between cattle transport, immunity and respiratory disease](#). Animal. 2017.
6. Qi J et al. [Multi-omics investigation into long-distance road transportation effects on respiratory health and immunometabolic responses in calves](#). Microbiome. 2024.
7. Jakes GM et al. [Transport stress induces paradoxical increases in airway inflammatory responses in beef stocker cattle](#). PLOS ONE. 2025.