

To: Dr Emmanuelle Soubeyran
Director General, World Organisation for Animal Health (WOAH)
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27 November 2025

Subject: WOAHA Response Required Under WOAHA Terrestrial Code Chapter 7.2 – Spiridon II Tragedy

Dear Director General,

On behalf of World Animal Justice and 4 co-signing NGOs*, we request WOAHA response regarding the critical situation involving the Spiridon II.

Approximately 2,900 cattle, about half of them pregnant, departed Montevideo, Uruguay, on 20 September aboard the Spiridon II. When the vessel reached Bandırma, Türkiye, on 22 October, authorities refused to unload any animals due to missing documents for part of the shipment. The ship subsequently remained offshore for weeks.

According to WOAHA sources, we understand that the animals were unloaded in Libya on the evening of 24 November, and that the Lebanese Ministry of Agriculture expects the empty vessel to arrive in Beirut Liban on 27 November. While the disembarkation of the animals ends the immediate emergency at sea, the grave welfare violations that occurred over more than two months cannot be overlooked.

Throughout this period, reports documented animal deaths, severe shortages of water and feed, inadequate veterinary care, and significant welfare and sanitary risks. Several investigations describe acute suffering, including abortions among unlawfully loaded pregnant females, deaths of unweaned calves, and decomposing carcasses on board. Such prolonged agonising conditions are indefensible and raise serious public-health implications.

Breaches of WOAHA Terrestrial Animal Health Code – Chapter 7.2

The situation aboard the Spiridon II was incompatible with the requirements of Chapter 7.2 (Transport of Animals by Sea), including:

- **Article 7.2.3** – responsibilities to ensure animals are properly managed, cared for, and monitored to prevent suffering.
- **Article 7.2.5** – requiring adequate planning, feed, water, veterinary oversight, and emergency measures.
- **Article 7.2.9** – requiring daily monitoring, treatment of sick or injured animals, and prompt welfare interventions.
- **Article 7.2.10** – requiring prompt unloading and access to feed, water, shelter, and veterinary care.
- **Article 7.2.11** – obliging importing countries that refuse unloading to provide facilities, ensure feed/water/veterinary care, and engage in WOAHA mediation.

WOAH's Obligation to Act Under Its Own Procedures

Chapter 7.2 clearly states that when an importing country refuses unloading, WOAHA *“should utilise its informal procedure for dispute mediation to identify a mutually agreed solution which will address the animal health and welfare issues in a timely manner.”*

Despite the severity of the situation, no official WOAHA action or mediation has been publicly communicated. The failures by both Uruguay and Türkiye to meet their obligations under Chapter 7.2 highlight the urgent need for WOAHA's leadership.

Action Requested from WOAHA

Now that we are waiting for the final confirmation that all the animals have finally been unloaded, we respectfully ask WOAHA to:

1. **Clarify what steps WOAHA took to respond to this crisis**, including use of its informal dispute-mediation procedure.
2. **Confirm what immediate measures have been taken to address the welfare conditions of the animals unloaded in Libya**, including veterinary care, feed, water, and removal of carcasses.
3. **Engage directly with the CVOs and competent authorities of Uruguay, Türkiye, Libya, Liban, and other relevant Mediterranean countries** to assess compliance with Chapter 7.2.
4. **Clarify the measures that will be taken by WOAHA to enforce or strengthen the implementation of Chapter 7.2**, including mandatory emergency-response mechanisms.
5. **Take all necessary measures to prevent such tragedies in the future**, ensuring no animals endure weeks or months of suffering and death at sea due to procedural failures, refusals of entry, or lack of contingency planning.

The suffering endured by these animals over more than two months must never be repeated.

This case represents a systemic failure that demands decisive action from WOAHA to uphold its mandate and restore confidence in the international live-animal transport framework.

World Animal Justice and 4 co-signing NGOs* respectfully thank WOAHA for its urgent attention to these matters and look forward to your prompt response.

Sincerely,

Dr. Sabine Brels

CEO, World Animal Justice

***Signing NGOs:** World Animal Justice, Droits des Animaux, Animal Equality, Animal Law Reform South Africa, Fundación Derecho y Defensa Animal



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