STOP LIVE EXPORTS
CARE • CONNECT • CHANGE

Frédéric Denèfle, President
Lars Lange, Secretary General
International Union of Marine Insurance (IUMI)
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21 July 2026

Dear Mr Denèfle and Mr Lange,

Re: Risk, liability exposure and reputational concerns in the global live export trade

We write on behalf of the Global Stop Live Exports Network, a network of 38 international animal protection organisations active across Europe, Australia, South Africa, Latin America and beyond. We are writing to bring to your attention what we believe represents an unacceptably high and increasing risk exposure for the maritime insurance sector from the global live animal export trade.

This exposure extends across multiple categories of marine insurance, including hull and machinery (H&M) insurance covering the vessels themselves, cargo insurance covering the live animals being transported, and Protection and Indemnity (P&I) insurance covering third-party liabilities arising from vessel operation, including cargo claims, pollution, crew injury and liability for injury, death or loss of animals in transit.

Critically, while the deteriorating condition of the global livestock carrier fleet is a significant contributing factor, it is not the only source of concerning risk. The conditions and risks inherent in the live export trade itself, as set out in this letter, represent an equally serious and ongoing exposure for insurers across all of these categories.

This letter is not a call to take a position on the ethics of live animal export. It is a request to examine the documented maritime risk profile of this vessel category, and to consider whether current underwriting practices, industry due diligence standards and reputational exposure frameworks adequately reflect that risk.

The evidence, drawn from Port State Control records, classification society data, and the most comprehensive independent analysis of the global fleet to date - the *2026 Global Livestock Fleet Report* by Robin des Bois, Animal Welfare Foundation and Tierschutzbund Zurich, which documents 159 vessels involved in maritime livestock transport worldwide - is alarming. Previous reports in this series focused on the EU-approved fleet alone, however this broader, global report makes the findings even more significant for an internationally operating insurance sector.

Live export is a genuinely global trade, operating across four major maritime corridors: Australia and South Africa to the Middle East, North Africa and Türkiye; European ports to the Eastern Mediterranean, North Africa and the Arabian Peninsula; South America - principally Brazil, Uruguay and Colombia - to North Africa, the Middle East and Türkiye, involving voyages that may last several weeks; and Romania and Ukraine via the Black Sea to the Eastern Mediterranean and Arabian Peninsula. These corridors essentially compete with one another, with the same vessels and the same shipowners operating across the world's oceans.

Indeed, recent and ongoing foot-and-mouth disease outbreaks in South Africa illustrate how quickly animal-health crises can disrupt live exports, heighten biosecurity and animal welfare risks, and create additional commercial uncertainty for vessels and insurers engaged in the trade. Significantly, in February 2026, the South African Government formally classified the outbreak as a national disaster, with resulting movement controls, containment measures and wider disruption to the live animal export trade.

Furthermore, a critical finding of the 2026 report is the profound disparity in regulatory oversight between regions. EU ports account for only 20.1% of global inspections of the livestock carrier fleet yet record 48.5% of all deficiencies found. In Africa, eight inspections resulted in just one deficiency recorded. In South America, 43.8% of inspections produced only 12.6% of deficiencies. This does not mean vessels operating outside

European waters are safer - it means they are subject to far less rigorous scrutiny, and that the true scale of risk in the global fleet is almost certainly significantly underreported. The Riyadh Memorandum, which covers the United Arab Emirates, Bahrain, Saudi Arabia, Oman, Qatar and Kuwait - major live export destination countries - does not make its inspection data publicly available, creating an even greater lack of transparency.

It is precisely because this trade is global - and because its regulatory oversight is disparate, fragmented and in many regions near-absent - that the international insurance sector is uniquely positioned to drive meaningful standards. Unlike individual national regulators or regional port state control authorities, IUMI and its members operate across all jurisdictions in which these vessels trade. Underwriting standards, due diligence requirements and premium structures can reach parts of this fleet that port inspectors cannot.

1. A fleet in structural decline

The global livestock carrier fleet is among the oldest, most deteriorated commercial vessel categories in operation anywhere in the world today:

- Of 159 livestock carriers documented worldwide, the average converted livestock carrier is now 45 years old, an age at which most commercial vessels have long been decommissioned. 51 ships are 50 years old or more. The oldest active vessel was built in 1964.
- 84% of vessels (134 of 159) were not purpose-built for livestock transport. They are converted general cargo ships, ro-ro ferries, car carriers, container ships and reefers, repurposed at an average age of 28 years - well beyond the point at which most commercial vessels are retired.
- The structural consequences of conversion are well-documented. Additional livestock decks are frequently added without classification society approval, reducing transverse stability and increasing capsize risk. The 2019 Queen Hind disaster, in which a vessel carrying 14,000 sheep capsized at berth in Romania, was directly linked to unauthorised deck additions described by investigators as "clandestine".
- 47.3% of the global fleet flies flags blacklisted by the Paris Memorandum of Understanding (Paris MoU). The five most common flag states - Togo, Panama, Saint Kitts and Nevis, Tanzania and Guinea-Bissau - account for more than 50% of the global fleet. Only 13.2% fly white-listed flags.
- Only 30.2% of the global fleet are supervised by IACS classification societies. 59.1% are supervised by non-IACS societies, many of which are not ranked or are ranked low by the Paris MoU.
- Conversion is still popular. Ten older vessels were converted into livestock carriers between January 2024 and March 2026, all supervised by non-IACS classification societies. Significantly, no new purpose-built livestock carrier has been ordered since 2017.
- More reputable operators are exiting the sector entirely. Bureau Veritas, one of the few IACS classification societies still active in this market, has stated its intention to gradually withdraw due to the sector's poor reputation. Vroon Holding, whose purpose-built fleet was widely regarded as among the more responsible in the industry, sold its entire livestock carrier subsidiary recently (in May 2026). As higher-standard operators withdraw, the fleet average deteriorates further.
- The complex ownership structure of the fleet adds a layer of risk directly relevant to insurers. 54.7% of the global fleet is officially owned by shell companies, most of them single-ship companies registered in tax havens. When vessels are declared total losses or abandoned, as has occurred repeatedly in this sector, this structure makes liability recovery very difficult. The case of the Deala - abandoned by her Turkish owner in an environmentally protected Croatian bay in 2024, with wreck removal costs falling entirely to insurers - illustrates this exposure directly.

2. The worst-performing vessel category in the world

The Paris MoU consistently ranks livestock carriers as the most-detained vessel category of any ship type globally, and unfortunately the data is worsening. According to the Paris MoU's most recent annual report, covering 2024:

- The detention rate for livestock carriers reached 15.1% in 2024, almost four times the 4% average for all inspected ships. This compares to a detention rate of 7.9% in 2022, already the highest on record at that time. The trend is sharply upward.
- 88% of inspections of livestock carriers in 2024 resulted in one or more deficiencies being recorded.
- Livestock carriers have been the worst-performing ship category recorded by the Paris MoU for at least six consecutive years.
- Across 819 global inspections of the 159 vessels analysed in 2024-2025, a total of 2,138 deficiencies were reported. Converted livestock carriers accounted for 96.4% of all deficiencies despite representing 84% of the fleet.
- The six most frequently reported deficiency categories among livestock carriers globally - certificates and documents, safety of navigation, fire safety, Maritime Labour Convention non-compliance, life-saving appliances, and working and living conditions - together accounted for 63% of all deficiencies recorded on the fleet. The fact that fire safety, navigation and life-saving appliances feature so prominently is significant - these are not minor administrative shortcomings, but failures in the most fundamental systems on which the survival of vessels, crew and cargo depends in an emergency.
- Deficiencies related to the International Safety Management (ISM) Code - the framework that requires shipowners to maintain crisis management capability around the clock - were recorded on 47 livestock carriers in 2024-2025. The ISM managers of 35 vessels were classified by the Paris MoU as low or very low performing.
- A significant disparity exists in inspection intensity across regions, as outlined above.

3. A documented history of major incidents

The risk profile of this fleet deserves greater attention than has been the case. Since 1975, at least 10 shipwrecks have been recorded in the history of maritime livestock transport, caused by collisions, fires, storms and structural instability, resulting in the deaths of 88 crew members and more than 193,000 animals. A selection of documented cases illustrates the scale and diversity of these risks:

- Queen Hind (2019): Capsized at berth in Midia, Romania, with 14,000 sheep on board. The vessel sank. Unauthorised structural modifications described by investigators as "clandestine" were identified as a contributing factor.
- Haidar (2015): Capsized at berth in Barcarena, Brazil. 5,000 cattle drowned.
- Albadri I (2022): Capsized at Suakin, Sudan, with 16,000 sheep on board.
- Danny F II (2009): Capsized near Tripoli while carrying 10,200 sheep and 18,000 cattle from Uruguay to Syria. The vessel overturned with 80 personnel on board. 44 people died and all animals were killed. This remains one of the deadliest maritime disasters involving a livestock carrier on record.
- Gulf Livestock 1 (2020): Sank in the East China Sea during Typhoon Maysak while carrying 5,867 cattle and 43 crew. Only two crew members survived.
- Elbeik (2021): Suffered a catastrophic fire at anchor off Tarragona, Spain, and was declared a total loss. The vessel had previously completed a 92-day erratic voyage - rejected by multiple ports - with

1,776 calves on board. 189 animals died during that voyage; all survivors were subsequently euthanised.

- Brahman Express (2023): Returned to Darwin, Australia, after suffering a fire shortly after departure.
- Al Messilah (2024): The 1980-built, Kuwait-flagged Al Messilah suffered two serious propulsion failures while entering the Port of Fremantle, Australia - one resulting in complete loss of propulsion in the inner harbour, averted only with emergency tug assistance. The Australian Transport Safety Bureau (ATSB) found the engine failure was caused by degraded seals in the main engine pneumatic system, attributable directly to failure to maintain the vessel in accordance with the manufacturer's guidelines. A subsequent port visit saw a complete electrical blackout and black smoke from the engine room due to a generator failure caused by poorly secured and degraded electrical cabling. Following multiple additional safety deficiencies identified during a harbour master inspection, the vessel was banned from Australian waters. The ATSB investigation is a rare example of a regulatory authority documenting in detail the direct causal link between inadequate planned maintenance systems and propulsion failure - precisely the category of risk that P&I and H&M underwriters should be examining.
- Al Kuwait (2024): Departed Brazil with 19,000 cattle bound for Iraq. When the vessel called at Cape Town, South Africa, inspectors found dead and dying animals, severe welfare failures, and conditions described as a public health emergency. The South African National Council of Societies for the Prevention of Cruelty to Animals (NSPCA) inspection noted an extreme build-up of faeces and urine, with animals resting in their own excrement. Eight cows were euthanised due to their injuries while others were found dead on board. The vessel departed after two days, with carcasses and waste reportedly discharged at sea. Notably, the Al Kuwait is one of the largest and most modern livestock carriers in the global fleet, demonstrating that these failures are not confined to elderly tonnage. Furthermore, during a port call in Fremantle in November 2025, investigators found that rails on the Al Kuwait had been removed and reinstalled without welding work permits, and that a CCTV camera had been covered while packages were allegedly offloaded from the vessel into the ocean. The vessel's chief officer was subsequently charged with attempting to import more than 525 kilograms of cocaine into Australia, with an estimated street value of over A$170 million. The unauthorised removal and reinstallation of structural rails (without welding certification) is itself a safety concern independent of the criminal allegations. The case suggests that the governance and compliance failures evident in this sector can extend well beyond maritime safety and animal welfare.
- Barkly Pearl (2020): Detected by the Australian Maritime Safety Authority (AMSA) transiting Australian northern waters with a large hole in her hull. AMSA intervened, directing the vessel to Geraldton as the nearest safe harbour due to concerns over structural integrity, pollution risk and immediate danger to seafarers. The vessel was ultimately loaded onto a semi-submersible heavy lift carrier for removal from Australian waters. AMSA issued what it described as its most severe ban to date, barring the vessel from Australian ports for 24 months, citing owner and operator negligence in vessel maintenance.
- Express M (2024-2025): In December 2024 the 1983-built Express M was detained in Portugal for a month following a port state control inspection that found 26 serious safety deficiencies. That same vessel departed Romania in February 2025 with 2,400 cattle and 460 sheep bound for Haifa. Shortly after departure it suffered mechanical problems, repeatedly stopping and anchoring over nine days before resuming at 3-4 knots. The voyage took 15 days instead of the expected six. Animals arrived at Haifa in poor condition - caked in manure with widespread nasal discharge and ringworm. Romanian authorities confirmed the mechanical failures only after NGOs contacted them directly.
- Deala (2024-2025): On 16 April 2024, the 1976-built Tanzania-flagged Deala ran aground off the Istrian peninsula, Croatia, after drifting in strong winds. The owner declared the vessel a total loss and submitted a Notice of Abandonment, leaving wreck removal costs to insurers. Croatian authorities implemented pollution prevention measures. It was not until mid-July 2025 that the vessel was lifted

onto a floating dock. The Deala was scrapped from September 2025 onwards, at the age of 49. The case illustrates directly how insurer exposure is created and then abandoned by owners in this sector.

- Haji Ali (May 2026): An Indian dhow carrying livestock in the Gulf of Oman was struck by an unidentified explosive object, caught fire and sank with animals on board. The incident resulted in the deaths of several thousand goats and sheep and exemplifies the compounding risk created by conflict zone operations on live export routes.

These incidents represent only a portion of the real risk in the maritime insurance sector. An untold number of voyages have resulted in significant animal losses due to disease outbreaks, life support system failures, including breakdowns in ventilation and water supply, and heat stress. Documented examples include the Bader 3 and Becrux, among others.

Propulsion failures are equally prevalent. Port State Controls record propulsion and auxiliary machinery deficiencies on 41.5% of the global livestock fleet. In the final quarter of 2023 alone, at least four ships suffered power failures, with voyages taking weeks longer than scheduled - in one case, a vessel took seven weeks to complete a journey ordinarily completed in two.

The fleet also operates in active conflict zones. Since December 2023, Houthi attacks in the Red Sea and Gulf of Aden have created direct physical risk to vessels on live export routes. In January 2024, the EU-approved Bahijah was diverted mid-voyage from Fremantle to Eilat (Israel), held at sea for weeks, and returned to Australia (with animals confined on board) in heatwave conditions.

It is also notable that when livestock carriers with repeated detentions face bans from Paris MoU ports, they are not removed from service. Instead, they are redirected to less regulated waters, in Africa, the eastern Mediterranean and elsewhere, where oversight is weaker, risks are arguably greater, and incidents are less likely to be formally recorded.

In addition, a further dimension of global risk is the so-called "ghost fleet" - livestock carriers that disappear from AIS tracking for prolonged periods, with no publicly available information on their whereabouts or operational status. Some may have been scrapped or rendered unusable; others may be operating in unmonitored waters. The *2026 Global Livestock Fleet Report* notes that vessels including the Masturah (62 years old) and the White Pearl (47 years old) resumed AIS transmission in early 2026 after periods of silence lasting up to 18 months, with their last recorded positions in South Korea and Beirut respectively. The lack of transparency surrounding these vessels, namely their condition, their cargo and their operations, represents an unquantified but real exposure for any underwriter with historic or current involvement in this sector.

A further category of risk specific to this trade, and directly relevant to insurers, is the recurring problem of refusals to unload live animals at the port of destination. These refusals may arise from suspected or confirmed animal disease, documentation disputes, changes in veterinary requirements, or diplomatic and political tensions between exporting and importing countries. Once a consignment is refused, the consequences escalate rapidly: animals may remain at sea for weeks or months resulting in increased disease and mortality risks, crews are placed under prolonged pressure, voyage costs multiply, cargo losses mount, and MARPOL liability accumulates as carcasses are discharged at sea. Recent cases documented in the 2026 report include the Spiridon II, which departed Montevideo in September 2025 carrying 2,901 cattle bound for Türkiye. Türkiye's authorities refused unloading following inspections that identified serious irregularities, including discrepancies between animals on board and import documentation, deaths during the voyage, and the unexplained fate of calves born at sea. The vessel eventually discharged surviving cattle in Libya, while the carcasses of more than 300 animals were discharged into the Mediterranean Sea.

Earlier cases - including the Cormo Express (2003, nearly 60,000 sheep stranded for weeks after rejection by Saudi Arabia, Jordan, the UAE and Kuwait, with 5,581 deaths), and the Elbeik and Karim Allah (2020-2021, both rejected by Türkiye and trapped for over 90 days) - demonstrate that this is a systemic and recurring feature of the trade. For insurers, these cases represent a distinct and compounding exposure: extended voyage risk, total or partial cargo loss, escalating crew welfare liability, and potential MARPOL penalties, all arising from circumstances largely outside the control of the vessel itself.

4. Environmental liability and MARPOL exposure

Beyond physical risk to vessels and crew, the live export fleet generates significant and documented environmental harms. Most converted livestock carriers predate the 1983 MARPOL Convention and face fundamental difficulty complying with current pollution-prevention requirements due to their age, outdated engines and inadequate filtration systems.

- 80 MARPOL-related deficiencies were reported on 50 livestock carriers - 31% of the global fleet - in 2024-2025. The most common violations relate to Annex I (oil pollution) and Annex V (garbage, including animal carcasses), with 33 deficiencies recorded under each annex.
- There are no adequate facilities in most ports of destination to dispose of animal carcasses or manure. It is widely known that both are routinely discharged at sea, including in MARPOL Special Areas where such discharge is prohibited.
- The principal live export shipping routes pass directly through MARPOL Special Areas, including the Mediterranean Sea, the Black Sea, the Gulf of Oman and the Persian Gulf.
- Port State Control inspectors do not systematically monitor carcass or manure discharge, so the true scale of violations is almost certainly significantly underreported.

A further and newly relevant environmental liability concerns air pollution compliance. Since 1 May 2025, the Mediterranean Sea has become a Sulphur Emission Control Area (SECA), requiring vessels to use fuel with a maximum sulphur content of 0.10% - significantly stricter than the previous global standard. The *2026 Global Livestock Fleet Report* notes that none of the livestock carriers in the global fleet are equipped with exhaust gas cleaning scrubbers, which represent an investment of between two and three million dollars per vessel. Older engines on converted livestock carriers present an elevated risk of non-compliance with this new standard. Given that the Mediterranean is one of the primary live export shipping corridors - and that Türkiye, Greece, Spain, France, Croatia and Slovenia are all major loading or transit ports - this represents a specific and growing area of regulatory and liability exposure for underwriters in this sector.

This represents not only a regulatory breach, but a category of liability that insurers and their reinsurers should surely be actively assessing.

5. Reputational exposure for the insurance sector

Public and regulatory scrutiny of the live export industry is intensifying globally. Independent audits commissioned by the European Commission have concluded that animal welfare cannot be guaranteed during sea journeys. The European Food Safety Authority has found that transport of cattle and sheep adds greater hazards to animal welfare compared to road journeys.

The regulatory environment is also tightening in ways that our global network believe will directly affect the liability profile of this fleet. In May 2026, the European Commission's Directorate-General for Mobility and Transport wrote to EU member states expressing its intention to encourage the targeting of livestock carriers for additional Port State Control inspections, with a specific focus on waste management practices. The Commission has also indicated its intention to amend the risk-based targeting mechanism used to select vessels for inspection, in order to better address the specific risks associated with livestock carriers. Separately, the revised EU Directive on ship-source pollution - due to enter into force in July 2027 - will extend the scope of administrative penalties to all MARPOL Annexes, meaning that unauthorised discharges of animal carcasses, manure and wash water will for the first time be subject to formal financial penalties across EU waters. Taken together, these developments signal a significant change in the regulatory scrutiny facing this sector, and a corresponding increase in liability exposure for those who insure it.

Furthermore, incidents involving livestock carriers - particularly mass mortalities, vessels travelling to and entering conflict zones, and documented MARPOL violations - attract significant international media coverage. The live export sector presents many issues in this area: high documented risk, poor regulatory compliance, significant animal welfare issues and environmental harm, and a vessel fleet that in many cases would not pass basic due diligence scrutiny.

As such, the insurance sector is not alone in reassessing its exposure to this trade. The UNEP Principles for Sustainable Insurance explicitly identify animal welfare as a risk factor, with live transport over eight hours or in poor conditions categorised as a potential high or direct risk. Beyond insurance, major financial institutions have already developed explicit position statements on live export. ABN Amro has publicly stated its support for reducing animal transport to a maximum of eight hours. Standard Chartered's 2024 Agribusiness Position Statement identifies excessively long transportation in cramped conditions as a key avoidable welfare risk. These developments signal a broader shift in how the financial sector is approaching the live export trade, and suggest that the question of underwriting standards is one the insurance industry will increasingly be asked to answer.

6. Our requests to the International Union of Marine Insurance

We respectfully urge IUMI and its member associations to consider the following:

- Conduct or commission an independent actuarial assessment of the live export livestock carrier fleet as a distinct risk category, drawing on Port State Control detention and deficiency data, incident records, animal mortality and welfare outcomes, and flag and classification society performance metrics.
- Develop or encourage industry-wide due diligence standards for the underwriting of livestock carrier risks, including minimum requirements relating to vessel age, flag state performance, classification society membership and ISM compliance.
- Review whether current premium structures for livestock carrier hull and P&I coverage adequately reflect the documented risk profile of this fleet, including the elevated probability of total loss, propulsion failure, fire, environmental liability, mass animal mortality, and other significant financial, legal and reputational risks arising.
- Consider the reputational exposure to member underwriters of continued association with a vessel category that is the most-detained in the world, operates in active conflict zones, has repeatedly been associated with animal welfare failures and mass mortality incidents, and is subject to growing international regulatory and public scrutiny.

Conclusion

As this letter outlines, the global livestock carrier fleet is, by any objective maritime standard, a high-risk category. It is the oldest, most detained, most deficient, and most structurally compromised commercial vessel type operating in international waters today. Disasters and major incidents occur regularly in this sector, compounded by biosecurity and other systemic risks, and this pattern shows no sign of improvement.

As such, we are asking the insurance industry to ensure that the documented risk profile of this fleet is appropriately recognised in industry risk assessment and decision-making, in the interests of its own members, its reinsurers and the broader maritime industry whose standards it helps to uphold.

We would welcome the opportunity to meet with IUMI representatives to discuss the findings of the *2026 Global Livestock Fleet Report*, explore the risk indicators that may be relevant to the underwriting of livestock carriers, and consider whether the documented evidence warrants the development of sector-specific underwriting criteria or guidance. We would be pleased to provide any additional data or documentation that may assist this discussion.

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STOP LIVE EXPORTS
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Yours sincerely,

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For and on behalf of the undersigned global network of animal welfare and protection organisations.

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