



Position Paper – Ethical Farming Ireland

Positive Aspects of the Proposed Regulation:

1. Measures to Address Assembly Centre Hopping. New definitions of ‘Place of Departure’ and ‘Place of Destination’ might prevent assembly centre hopping. (Articles 3.2 and 3.3).
2. Improved Space Allowances. These allowances are in accordance with EFSA recommendations. (Annex Chapter VII).

Negative Aspects of the Proposed Regulation:

1. Live Export to Third Countries is Permitted. We believe it should be banned. Animal welfare NGOs have provided ample evidence of appalling slaughter conditions for animals in many non-EU countries. In the EU Commission’s impact assessment, the main reason given for not banning live export to non-EU countries is that other countries with lower standards would fill the live export “gap” and that animal welfare would be worse overall (1). However, it is estimated that the EU is responsible for up to 80% of the global trade in live farm animals (2). Due to limiting factors such as resources and climate, it is not credible that other countries with lower standards would be able to export anywhere near the same number of animals as the EU. If live export to third countries was banned, animal welfare would be better overall.
2. Long Distance Transport of Unweaned Calves is Permitted. No unweaned calves should be transported on long journeys. In general, calves cannot be weaned until they are 8 weeks old. The proposal in Article 29 to raise the age from 14 days to 5 weeks is welcome as an improvement, however it is still too young, and there is a risk that birth dates could be falsified to allow for transport at an earlier age. It would be more difficult to pass off an unweaned calf as weaned. We are concerned about the following:
 - a. Animal Welfare Issues. EFSA in its Scientific Opinion on the Welfare of Cattle During Transport (3) found that the welfare concerns during transport of unweaned calves are; reduced immunity, handling difficulties, transport stress and health issues. A recent study of unweaned calves travelling from Ireland to the Netherlands, via a ferry to France, found that *“calves showed a decline in their physiological status during the journey between Ireland and the Netherlands; the changes were most obvious during the ferry journey between Ireland and France”* (4).
 - b. Time Spent on a RO-RO Ferry will not be Counted as Journey Time. This is completely unacceptable and contrary to EFSA advice. The animals are still stuck inside a truck. EFSA has said in its Scientific Opinion on the Welfare of Cattle During Transport that journeys for unweaned calves should not exceed 8 hours and *“In addition to the motion stress involved in road transport, RO-RO ferries involve additional problems if the sea is rough and/or vehicles are not properly secured against movement in any direction in the ferry. Therefore, during journeys on RO-RO ferries, motion stress is even more relevant than during road transport”*. EFSA also states that it is not possible to unload animals to give them emergency care on a RO-RO ferry. It was also noted by the EU Commission during

their audit of calf export from Ireland, that contingency plans for ferry journeys were not evaluated by the Irish authorities (5).

- c. Unworkable Provision for Feeding Calves on Ferries. Article 29 states that unweaned calves must be fed at 9 hour intervals during the journey.
 - i. Article 29 Could be Misinterpreted and Result in Calves not being Fed. Article 29.3 states that transport at sea shall not count as journey time. Article 29.4 states that unweaned animals shall be fed with milk/milk replacer at 9 hour intervals counted from the start of the journey, regardless of the means of transport in which they are being transported. It needs to be made absolutely clear that an obligation to feed animals arises during a sea/ferry journey even when it does not count as “*journey time*”.
 - ii. Lack of Evidence for Effectiveness of On Truck Feeding Systems. A trial was conducted in Germany on a specific truck in relation to giving electrolytes to calves during transport. Dr Marahrens (Institute for Animal Welfare and Animal Husbandry) who studied the truck in the trial concluded that it was not possible to ensure all calves had adequate volumes of liquid and “*From the perspectives of physiology, animal behaviour, and animal protection outlined above, it is our recommendation that official approval of the vehicle presented for the long-distance transport of animals in the ‘unweaned calf’ category should be refused in accordance with Article 18 of Council Regulation (EC) No.1/2005.*”
Furthermore, as noted by EFSA in its Scientific Opinion on the Welfare of Cattle During Transport, electrolytes do not fulfil the nutritional requirements of calves, and are no substitute for a meal of milk or milk replacer. A trial was also conducted in Ireland in October 2023 using a prototype truck designed to feed calves milk replacer. No results have been reported to date. There are concerns amongst exporters that these trucks will be cost prohibitive and the number of calves in each truck would have to be significantly reduced. In addition, a proposal to allow calves to remain in the same truck for hours on end, and be fed multiple times, is likely to result in dirty unsanitary bedding and unsafe air quality.
- d. Enforcement. When it comes to the transport of unweaned calves from Ireland, enforcement has been poor to date. The EU Commission in a recent audit of the transport of unweaned calves from Ireland found that Ireland was in breach of Regulation 1/2005 due to the fact that they are not fed at the required time intervals. In addition, a July 2023 documentary by Ireland’s national broadcaster, RTE Investigates Milking It:Dairy’s Dirty Secrets, showed numerous examples of Irish calves being hit, kicked and thrown at marts in Ireland and control posts in France and not being fed or watered as required by Regulation 1/2005. None of the perpetrators have yet been prosecuted. The Irish Department of Agriculture only concluded 4 court prosecutions in 2023 (7), none related to animal transport.

Areas for Improvement in the Proposed Regulation:

1. The Transport of most Animals to Slaughter will be Restricted to 9 Hours. The term “*transport to slaughter*” needs to be properly defined to prevent loopholes being exploited and should include all animals, as well as sea transport. (Article 28)

Bibliography

- (1) *Commission Staff Working Document Impact Assessment Report Part 1 p. 29.*
- (2) *Kevany, Sophie. "EU revealed to be world's biggest live animal exporter." The Guardian, 27 January 2021, <https://www.theguardian.com/environment/2021/jan/27/eu-revealed-to-be-worlds-biggest-live-animal-exporter>. Accessed 7 September 2024.*
- (3) *EFSA AHAW Panel (EFSA Panel on Animal Health and Welfare), Nielsen SS, Alvarez J, Bicout DJ, Calistri P, Canali E, Drewe JA, Garin-Bastuji B, Gonzales Rojas JL, Gortázar Schmidt C, Michel V, Miranda Chueca MA, Padalino B, Pasquali P, Roberts HC, Spoolder H, Stahl K, Velarde A, Viltrop A, Winckler C, Earley B, Edwards S, Faucitano L, Marti S, de La Lama GCM, Costa LN, Thomsen PT, Ashe S, Mur L, Van der Stede Y and Herskin M, 2022. Welfare of cattle during transport. EFSA Journal 2022; 20(9):7442, 121 pp. <https://doi.org/10.2903/j.efsa.2022.7442>*
- (4) *"Effect of source and journey on physiological variables in calves transported by road and ferry between Ireland and the Netherlands." Frontiers, <https://www.frontiersin.org/journals/veterinary-science/articles/10.3389/fvets.2023.1238734/full>. Accessed 7 September 2024.*
- (5) *DG(SANTE) 2022-7503, Final Report Of An Audit Of Ireland Carried Out From 7 To 17 June 2022 In Order To Evaluate The Protection Of Unweaned Calves During Long Journeys*
- (6) *FLI Recommendation : Animal Welfare during Transport: Technical requirements for long-distance transport of unweaned calves (openagrar.de)*
- (7) *Department of Agriculture, Food and the Marine. Annual Report, 2023. https://opac.oireachtas.ie/Data/Library3/Documents%20Laid/2024/pdf/DAFMdoclaid310724_154524.pdf*