

30 July 2024

Johan Edelman  
Trade Director Irish Sea South  
Stena Line

Dear Mr Edelman,

### **Transport of unweaned calves from Ireland to France by Stena Line**

In its audit report dated 22 December 2023 (DG(SANTE) 2022-7503) the European Commission stated that in its view the transport of unweaned calves from Ireland to France is being carried out in breach of Council Regulation 1/2005 on the protection of animals during transport. This is because the Commission interprets the Regulation as requiring unweaned calves to be fed during the long sea crossing by RORO ferry from Ireland to France. However, the calves are not fed during the crossing. Feed in the case of unweaned calves is milk replacer.

We are concerned that Stena Line continues to transport unweaned calves from Ireland to France despite the European Commission's assessment that the trade is being carried out in breach of EU animal welfare legislation.

***In light of the Commission's assessment, we urge Stena Line to now stop carrying unweaned calves on its services from Ireland to France.***

A detailed analysis of how the provisions of Regulation 1/2005 apply to the transport of unweaned calves from Ireland to France is set out in the Annex to this letter.

Scientific research supports the need to limit the time for which calves may be transported. Research shows that during transport, the maximum time that unweaned calves should go without feed is twelve hours. The European Food Safety Authority is responsible for producing scientific opinions on animal welfare. In 2022 it produced a Scientific Opinion on the welfare of cattle during transport. Its recommendations on unweaned calves state: "During transport, intervals between milk meals should not exceed 12 h ... After a milk meal, calves should be allowed to rest (lying) in a calm place for 3 h to digest their meal". It refers to 'milk meals' because food for unweaned calves is milk or milk replacer.

In 1994 Stena received widespread praise for its welcome decision to stop carrying farmed animals destined for slaughter or fattening on its route from southern England to continental Europe. We urge Stena Line to now take a similarly bold step and stop carrying unweaned calves from Ireland to France.

Yours sincerely,  
The undersigned organisations



animaleQUALITY

ANIMAL PROTECTION DENMARK



Dier&Recht  
*advocaat van de dieren*



RSPCA.



## Annex

### Analysis of Regulation 1/2005 regarding the transport of unweaned calves by RORO ferry

#### **Key legislative provisions**

Point 1.2 of Chapter V of Annex I to Regulation 1/2005 provides that journey times “shall not exceed eight hours”. Then, as a derogation, longer journey times are permitted provided that certain conditions are met. One such condition is set out in Point 1.4(a) of Chapter V. This provides that “unweaned calves which are still on a milk diet must, after nine hours of travel, be given a rest period of at least one hour sufficient in particular for them to be given liquid and if necessary fed. After this rest period, they may be transported for a further nine hours”.

Point 1.5 of Chapter V provides: “After the journey time laid down [i.e. nine hours travel, one hour rest, and nine hours travel], animals must be unloaded, fed and watered and be rested for at least 24 hours”.

Point 1.7(a) of Chapter V provides: “Animals must not be transported by sea if the maximum journey time exceeds that laid down in point 1.2 [i.e. eight hours], unless the conditions laid down in points 1.3. and 1.4, apart from journey times and rest periods, are met”.

#### **DG Sante interpretation of Chapter V of Annex I to Regulation 1/2005**

In a letter dated 15 June 2020 Mr van Goethem of DG Sante provided his interpretation of point 1.7(a) of Chapter V. His letter states: “My understanding is that since the exemption in point 1.7(a) specifically refers to journey times and rest periods, the requirements of points 1.3 and 1.4, such as watering and feeding intervals, apply to transport by sea.” From this letter it is clear that the Commission’s view is that unweaned calves on board a RORO ferry must be fed after 9 hours of transport if necessary, and also after 19 hours of transport.

This interpretation is repeated by the 2023 audit report. This states in paragraph 9 that the Irish competent authority’s “instructions for official veterinarians do not require that official veterinarians verify that unweaned calves will be and are fed on the roll-on roll-off vessel.

***This is not in line with the Commission’s interpretation of the legal requirements of feeding intervals laid down in Chapter V, Annex I to the Regulation, in particular Point 1.4(a)***. (emphasis added)

#### **The journey from Ireland to the lairage near Cherbourg**

Calves exported from Ireland may be on a truck for some 5-9 hours - in some cases longer - before the ferry to France leaves Ireland. This time includes loading onto the truck, the journey to the port, and waiting at the port before the truck embarks on the ferry. Moreover, it may be around three hours before loading onto the truck since the calves were last fed.

The ferry journey to Cherbourg takes 18 hours and a further at least 1.5 hours - in some cases longer - is needed to drive to the control post near Cherbourg, for unloading and before all the calves get feed. In all the calves may go for 27 hours, or in some cases

substantially more, without feed between the last feed before loading at the start of the journey and receiving feed at the control post near Cherbourg.

The nine hour point at which calves must be fed “if necessary” is usually reached while the calves are on the RORO ferry. The 19 hour point at which calves must be fed is also reached while the calves are on the ferry. The requirement to feed the calves after 19 hours of transport is not qualified by the words “if necessary”. The audit report notes that the Irish “competent authorities indicated that transporters are not making arrangements to feed the unweaned calves on the roll-on roll-off vessel, although the journey time reaches in total approximately 22 to 24 hours. This is not in line with the Commission’s interpretation of the legal requirements of feeding intervals laid down in Chapter V, Annex I to the Regulation, in particular Point 1.4(a). The animals are only fed when they are unloaded at the Cherbourg control posts.” (paragraph 38).

In paragraph 47 the audit report states: “the fact that calves are not given liquid feed on the roll-on roll-off vessel is contrary to the legal requirements of feeding intervals laid down in Chapter V, Annex I to the Regulation, in particular Point 1.4(a).”