

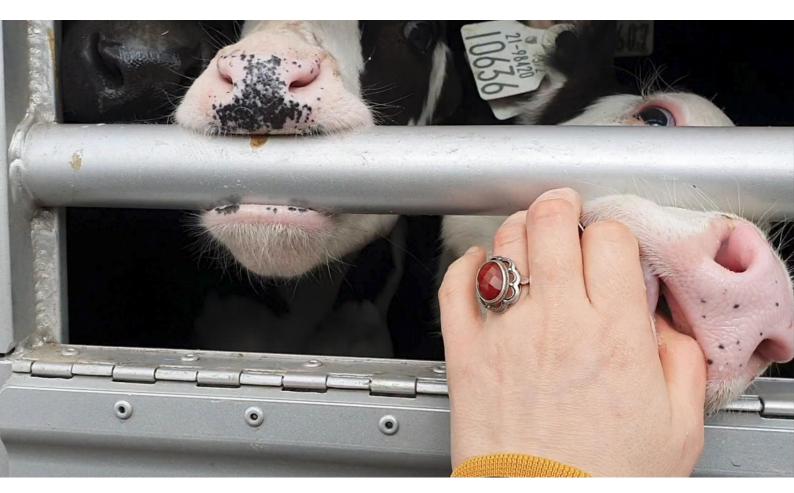






Investigation into the welfare of Irish calves exported to factory farms in The Netherlands and Poland

* March 21-29, 2024 *



By Eyes on Animals, Ethical Farming Ireland, Dier&Recht and L214

SUMMARY

In March 2024, four international teams — Ethical Farming Ireland, Eyes on Animals, Dier&Recht, and L214 — documented the transport of unweaned Irish calves to the European mainland. Just like previous years, we again uncovered several distressing violations. Four calf trucks were trailed: one Dutch truck (Hamanitra) and three Irish trucks (Martin O'Neill, Hinde and one of an unknown company).

Key violations

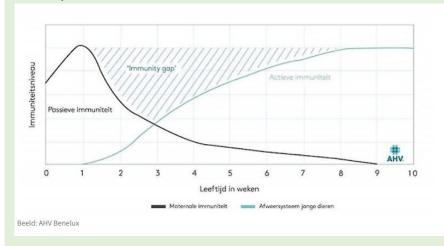
1. Feeding intervals violated during transport from Irish to French control posts Unweaned calves were deprived of food for over 30 hours during their journey from Irish assembly centers to the French control posts, greatly exceeding the maximum feeding intervals of 19 hours stipulated by EU Council Regulation No 1/2005. This routine violation of feeding intervals have been consistently observed and reported on by animal-welfare NGOs for more than 10 years and still this violation has not been dealt with.

Journey logs obtained under the Freedom of Information Act reveal that calves are often loaded between 12:00 and 4:00 PM. Considering that calves are fed at least one hour before loading, they were deprived of food for at least 7 to 11 hours before the ferry even departed from Rosslare port (Ireland) at 10:14 PM. This resulted in a total period without food exceeding 30 hours by the time they are fed at the control posts near Cherbourg port in France. Being deprived of milk for 30 hours is a serious violation of the maximum feeding interval of 19 hours as outlined in EU Council Regulation No 1/2005.

In fact, EU Council Regulation No 1/2005 even requires unweaned calves to be fed after 9 hours of travel (during the 1-hour rest break) if this is deemed necessary. However, it is widely acknowledged within the industry and by authorities, and recently also confirmed by EFSA¹, that calves cannot be fed on board of trucks. This makes transporting them from Rosslare port in Ireland to Cherbourg port in France already in violation with the feeding intervals, as the calves are not unloaded and cannot be fed on board of the trucks. Let alone that in practice, these unweaned calves spend more than 30 hours on board trucks without any food while on this journey route.

Calves typically begin to consume a significant amount of solid feed around the age of six weeks. The European Union Reference Centre for Animal Welfare (EURCAW) recommends providing milk at least twice a day (so every 12 hours) to calves up to six weeks old, after which the frequency can be reduced to once a day. Also the European Food and Safety Authority (EFSA) stipulates that unweaned calves need to be fed with intervals of maximum 12 hours and need at least 3 hours of rest for proper digestion of a milk meal. Exporting Irish calves aged 2-4 weeks without any food for 30 to even 48 hours (as also documented in this report, see point 2 below) not only violates EU Council Regulation No 1/2005 but is also totally unethical and contrary to official recommendations by EURCAW and EFSA.

Calves are born without protection against pathogens, underscoring the critical need for them to receive passive immunity from high-quality colostrum within the first few hours after birth. As passive immunity wanes and active immunity develops, an immunity gap emerges, most notably between 1-5 weeks of age, leaving calves highly susceptible to diseases. This vulnerability persists until they reach 8 weeks of age (see graph below). Only then do calves possess a fully developed active immune system capable of handling stressors such as extended periods without milk, exposure to new pathogens, and handling. Transporting calves aged 2-8 weeks is therefore unacceptable.



2. Feeding intervals violated for a second time during further export to Poland

Feeding intervals were violated for a second time during the export from Ireland to Poland by the Dutch company Hamanitra. Our team observed that Hamanitra rested the Irish calves for 24 hours at the 'Kempense exportstal' control post in Merksplas, Belgium, before continuing his journey to Poland. At this Belgium control post, calves were given energy drink only and not milk as required by EU Council Regulation No 1/2005. The journey from the Qualivia control post in Tollevast (FR), where the calves were last fed, to the farm in Poland, including the 24-hour resting period, takes at least 48 hours. This means that calves did not receive any food for over 48 hours, significantly surpassing the maximum feeding interval of 19 hours outlined in EU Council Regulation No 1/2005. Therefore, calves transported via the Merksplas control post endure a second, even longer period of starvation, exceeding 48 hours.

3. Calves abused at Hallissey's assembly center in Ireland

Many unweaned calves, exported to the European mainland, are collected from farms and markets at Hallissey's assembly center in Fossa (Killarney) Ireland. Our investigation revealed serious animal abuse at this assembly center. During feeding and moving, the calves were hit repeatedly and with force on their face and backs and also dragged and lifted by their ears and tails. Additionally, a large pile of dead calves, many in stages of decomposing already, was observed outside the premises. These calves did not survive the stressful journey to Hallissey or their time waiting at the Hallissey assembly center. Instead of being rejected for export, weak calves were given injections (likely antibiotics) and force-fed by stomach tubing. This conduct is a clear violation of EU Council Regulations No 1255/97 and No 1/2005.

4. Inadequate water systems on board of trucks

Trucks had inadequate water systems. The Dutch truck from Hamanitra was equipped only with metal nipples and a few levers behind a metal flap. Water only comes out when the lever is pressed. These are entirely unsuitable for unweaned calves, that need to suckle to ingest. The Hinde truck had only a few rubber suckling teats located in the inside corners of the compartments, which is insufficient to water all calves on board. During the trailing of both trucks, we did not see the drivers turning on the water systems for 1 hour. Both — not having

adequate water systems and not providing any water — are in breach of EU Council Regulation No 1/2005.

5. False and incomplete journey logs

Six out of eight journey logs received under the FOIA were missing mandatory information and/or had journey times (section 4) that did not correspond to the actual journey (false information to make the journey look shorter). These included a truck from the Dutch transport company Hamanitra, two trucks of Irish transport company Hinde, a truck of the Irish transport company Hallissey and an unknown Irish truck built by Michieletto. Main findings:

- The journey log that stood out the most for being incorrect and incomplete was that
 of the Dutch transport company Hamanitra (954BVF6/OV32GS). Section 4 was
 entirely fabricated.
- Four out of the eight journey logs had no loading time indicated, which is crucial information as that is when the journey time starts. Without the loading time it is impossible to verify compliance with the feeding intervals of EU Council Regulation No 1/2005.
- E Five out of the eight journey logs showed an incorrect arrival time at Rosslare port. The transport companies arrived much earlier than recorded in their journey logs. This was likely done to create the impression that calves were on board of trucks for a much shorter duration than they actually were, circumventing the mandatory feeding intervals.
- It wo out of the eight journey logs had an incorrect ferry departure time and one did not have anything logged at all for Rosslare port.
- ☑ The Hallissey truck's journey log revealed overcrowding. Despite this, it was approved by Irish authorities.

These findings indicate that authorities are not thoroughly checking the journey logs or tachographs to ensure they match the actual journey and are accurately filled in. Authorities also appear to approve journey plans that clearly violate EU Council Regulation No 1/2005. In other words, transport companies are falsifying records and blatantly disregarding the rules, while the authorities are turning a blind eye.

Conclusions and Recommendations

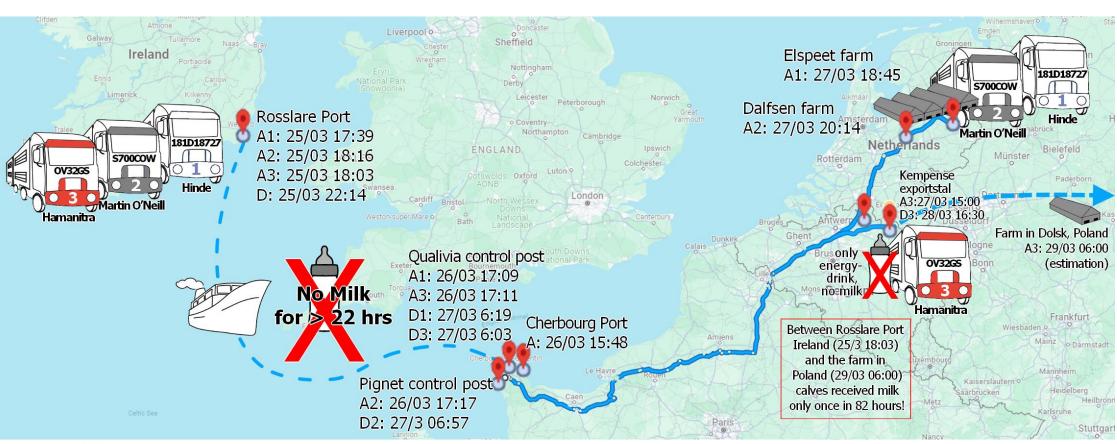
Despite tightened inspections and industry assurances, severe violations persist, including failure to provide feed (milk) and water to the calves at correct intervals, as well as cruel physical abuse at assembly centers. We advocate for the full stop of this trade for unweaned calves as it is an illegal route and full of animal suffering. Older calves can go on this route under the following conditions:

- Calves must be at least 8 weeks old. At this stage, they can consume solid feeds and have a
 fully developed "active immune system," which helps them cope with transport stress,
 exposure to new pathogens, and longer periods without milk.
- 2. Authorities must rigorously enforce regulations on feeding intervals, recognizing that the period without food begins after calves are fed at assembly centers in Ireland and extends until they are fed again at control posts in France. Currently, this period exceeds 30 hours, greatly exceeding the maximum feeding interval of 19 hours stipulated in EU Council Regulation No 1/2005. In fact, EU Council Regulation No 1/2005 even requires unweaned calves to be fed after 9 hours of travel (during the 1-hour rest break) if this is deemed necessary. However, this is impossible to implement on board the trucks and is therefore systematically violated.
- 3. The Irish authorities should fulfill their legal duties by thoroughly checking the journey logs of calf shipments to verify that the declared journey times are correct, realistic, and compliant with animal welfare regulations. Additionally, all sections of the journey should be logged digitally (via an easy-to-use mobile application) instead of being handwritten. This

- change would reduce errors, blank spaces, and falsifications, and would improve and ease enforcement.
- 4. We urge the Irish and Dutch authorities to fine the companies that Eyes on Animals, Ethical Farming Ireland, Dier&Recht, and L214 have clearly identified as violating feeding intervals and falsifying their journey logs. This can be verified by cross-checking the journey logs against the tachographs.
- 5. Impose limitations on the number of calves arriving simultaneously at assembly centers and control posts, to alleviate time pressure on workers and improve employee and animal-welfare conditions. Time pressure and huge volume of animals cause employees to lose their patience and become tired. This in turn leads to very rough treatment of animals.
- 6. Implement intelligent camera systems at marts, control posts and assembly centers to monitor and enforce gentle handling and feeding practices for calves.
- 7. Provide annual training in low-stress handling techniques for workers and drivers involved in calf transport to minimize animal distress during transit.

VISUAL SUMMARY- THE JOURNEY OF IRISH CALVES EXPORTED TO EUROPE

- March 2024 -



A = Arrival time

D = Departure time (All times on EU continent are UTC +1)

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OBSERVATIONS IRELAND

The times in this chapter are local times (UTC+0)

Hallissey Livestock Exports (calf assembly centre)

Address: Ards Fossa Killarney Co Kerry

21st March - 25th March 2024

Mistreatment of calves

Disturbing footage from Hallissey's assembly center has revealed appalling treatment of unweaned calves before export. The footage shows calves being subjected to brutal beatings on their backs and heads with paddles and sticks, and at one point even a pitchfork. The paddles are often lifted above shoulder height to inflict more force and pain on the calves. The unweaned calves are also kicked and repeatedly dragged and lifted by their ears and tails. The tail is connected to the spine and it is clear this is causing pain to the calf, as well as violating Regulations.





Calves beaten hard with a hard plastic paddle.







Calf dragged by his tail and ear

One section of the footage shows calves in a heavily soiled, water logged pen. The weather at the time was poor, cold with heavy rain. Unweaned calves in particular are prone to falling ill because they are in an immune gap until 8 weeks of age. Pneumonia is rampant among unweaned calves kept in such poors conditions. This is not acceptable



Calves in heavily soiled, water logged pen

<u>Unprofessional handling techniques</u>

During both loading and herding, several workers are seen repeatedly hitting the backs of the last calves in the group with great force. This action is pointless as the calves have no space to move forward due to other calves ahead, making this practice entirely unacceptable. Only the first calves in the group should receive gentle encouragement when needed; hitting the last calves of a group represents unprofessional livestock handling.



Pointless hitting of calves that have no space to move forward

There are a number of teenagers working at the center, repeatedly dragging the calves by the ears and tail, bending the tail right back as far as it will go. An adult worker was also shown lifting calves by the tail to get them to move down the ramp of a truck. Calves were also kicked to try to make them move.





Lifting calf by the tail

Calf being kicked out of the truck

Antibiotics and stomach tubing

Additionally, the footage shows some calves receiving injections, possibly antibiotics, and some are being force-fed via stomach tubing. Instead of excluding these calves from export due to potential issues like not drinking or appearing sick or weak, they were very likely propped up to ensure they could still be exported.



Calf being force-fed with a stomach tube



Weak calf given an injection pre-export

Deceased calves

On two occasions the footage shows a dead calf being removed from the pen.



Calves that died during their stay at Hallissey's assembly center are being removed from their pen

Outside the premises, there is a large pile of deceased calves in varying stages of decomposition. It is clear some have been there for a long time. These calves either died during transport from the mart or during their stay at the center, demonstrating how vulnerable these young animals are, as this is before their long journey has even begun.



Large pile of deceased calves before their long journey would have even begun

Unacceptable feeding practices

At the center the calves are rushed to drink quickly and then repeatedly struck on their heads or noses to stop them so that the next group of calves can be fed promptly and quickly. Despite repeated strikes, many hungry calves persist in attempting to drink more milk and return to the teats of the milk troughs, often encountering additional violence from impatient workers. The footage shows the use of paddles and sticks.



Calves repeatedly struck on their heads and noses to deter them from suckling on teats

Poor loading/unloading conditions

The loading ramps of several trucks are very steep and short, leaving a small drop from the ramp to the ground. This situation frightens the calves, making them hesitant to walk off. There are no unloading platforms present at the assembly center to facilitate better unloading practices. Workers show impatience with the calves, forcing them to exit quickly without allowing time to adjust. Consequently, some calves slip and fall due to the stress caused by the hitting and chasing. One calf is pulled up by the ears and tail and thrown down the ramp. We also see a calf being kicked out of the truck.



Very steep loading ramps causing stress and calves to slip and fall

The rough handling techniques are in clear violation with EU Council Regulations No 1/2005 and No 1255/97. For more details see the <u>chapter on Violations</u>.

Port of Rosslare

Monday, March 25th

17:39 A Hinde truck (181D18727) arrives at the port, which is 4 hours and 35 minutes before the ferry departure time. This extended waiting period adds to the total time that the unweaned calves are on board the truck without receiving any food (milk).



Hinde (181D18727) arriving at Rosslare port

17:57 Another Hinde truck (231D1063) arrives at the port.



Hinde (231D1063) arriving at Rosslare port

18:03 A Hamanitra truck (54BVF6 / DV32GS) arrives at the port. This truck has a Dutch license plate.



Hamanitra (54BVF6 / DV32GS), a Dutch transport company, arriving at Rosslare port

18.16 A Martin O'Neill truck (S700COW) arrives at the port.

18.19 A Hallissey truck (142MH1995) arrives at the port

19.15 An O'Brien Bros truck (241D25383) arrives at the port



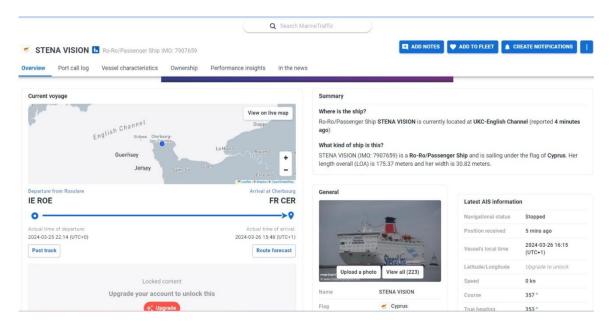
O'Brien Bros at the port of Rosslare

19.27 An unknown Irish truck (231DL1603) arrives at the port

So in total the team in Ireland saw seven trucks passing through the port. All appeared to be carrying unweaned calves. One of the trucks (transport company name: Hamanitra) had a Dutch license plate. All the others had Irish license plates.

Most of these trucks arrived approximately 4 hours before the ferry departed. This waiting time contributes to the total duration that the calves are on board the trucks without access to food. One truck (bodywork: Michieletto, transport company name not visible) was not observed at the port but was seen in convoy with other trucks the next day at the Qualivia control post in Tollevast. It likely arrived after we left the truck queue at Rosslare port at 19:45.

22:14 The Stena Vision ferry departs.



OBSERVATIONS EUROPE

The times in this chapter are local times (UTC+1)

Tuesday, March 26th

15:48 Stena Vision Ferry arrives at the Port of Cherbourg (FR). This is approximately 17.5 hours after departing from Rosslare port in Ireland (22:14, March 25th), taking into account the time difference of one hour.

Control Posts near Cherbourg

Tuesday, March 26th

17:15-17:21 Three trucks arrive at Pignet control post in Couville. See more details in the table below.

16:56-17:11 Five trucks arrive at Qualivia control post in Tollevast. See more details in the table below. One unknown truck (grey truck and trailer, built by Michieletto, license plate 191WH1407) we did not see at Rosslare port yesterday. It likely arrived after we left Rosslare port, so > 19:45 (UCT+0).

Journey from Rosslare port to Cherbourg control posts already exceeds EU feeding intervals. This year, we documented the exact times of arrival at Rosslare port, as well as the arrival and departure times at the control posts near the port of Cherbourg (Pignet in Couville and Qualivia in Tollevast). See their details in the table below. From the time of arrival at the port of Rosslare to the control posts near Cherbourg, 22 hours had passed (see the dark orange column). This duration already exceeds the maximum feeding interval of 19 hours by three hours, without even considering the pre-transport rest period and loading times at the Irish assembly center, the traveling time to Rosslare port, and the unloading and waiting times at the Cherbourg control posts.

See more details in the chapter below.

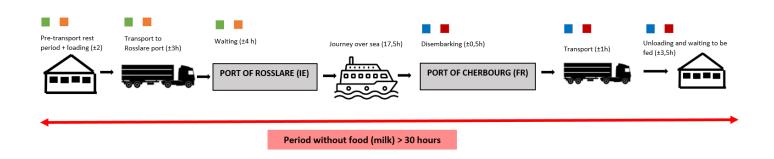
No.	Company name	License plate(s)	March 25, arrival Rosslare Port (IE)	March 26, arrival control post near Cherbourg (FR)	TIME FROM ROSSLARE PORT TO CONTROL POSTS NEAR CHERBOURG	March 27, departure control post (FR)	Control post visited (FR)	Rest period at control post (FR)
1.	Martin O'Neill (IE)	S700COW	18.16	17:17	22:01:00	06:57	Pignet Couville	14h14
2.	Hinde (IE)	181D18727	17.39	17:09	22:30:00	06:19	Qualivia Tollevast	13h10
3.	Unknown (IE)	191WH1407	> 19:45	16:56	19:26:00	06:04	Qualivia Tollevast	13h00
4.	Hamanitra (NL)	54BVF6 / OV32GS	18.03	17:11	22:08:00	06:03	Qualivia Tollevast	12h52
5.	Hinde (IE)	231D1063	17.57	17:15	22:18:00	06:57	Pignet Couville	14h12
6.	Hallissey (IE)	142MH1995	18.19	17:21	22:02:00	18:28	Pignet Couville	25h07
7.	O'Brien Bros (IE)	241D25383	19.15	16:57	20:42:00	06:00	Qualivia Tollevast	13hO3
8.	Unknown (IE)	231DL1603	19.27	17:10	20:43:00	06:00	Qualivia Tollevast	12h50

Trucks that boarded on the Stena Vision Ferry on March, 25th; their times of arrival at the port of Rosslare (IE) until arrival at the control posts near Cherbourg (FR).

Real time journey: > 30 hours without food

But in reality, calves are starved for even much longer than the 22 hours mentioned above, because calves are deprived of feed from the time they are last fed at the assembly centers in Ireland before first loading, to the time they are unloaded and fed again at the control posts near Cherbourg (FR).

Below is a timeline derived from journey logs obtained under the Freedom of Information Act, detailing loading times, along with findings from our recent and past investigations highlighting prolonged waiting times at control posts near Cherbourg. The cumulative period without food exceeds 30 hours, despite recommendations by EFSA and EURCAW that unweaned calves should be fed at least every 12 hours.



Trailing trucks

We have three teams waiting at several locations near the highway in France and Belgium to catch sight of the calf trucks passing by. In total we (partly) trailed four of them: Hamanitra (54VBF6 / OV32GS), Martin O'Neill (S700COW), Hinde (181D18727) and the unknown grey truck built by Michieletto (191WH1407). Please see more details in the chapters below.

Trailing Hamanitra - Dutch calf truck (54BVF6 / OV32GS)

Wednesday, March 27th

10.15 Hamanitra passes <u>Aire de Croixrault</u> petrol station on the A29 (FR). License plates: 54BVF6 / OV32GS.

11:40 Hamanitra passes the <u>Fresnes</u> toll station on the A1 (FR)

11:50 Behind the Hamanitra truck on the A1 direction Lille

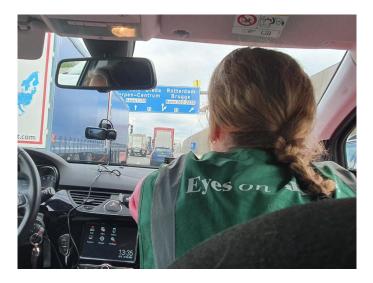


12:48 On the E17 direction Antwerp/Gent



13:00 On the A14/E17, just passed Gent (BE).

13:35 On the Antwerp ring



14:00-14:15 Stops at Parking Ranst Q8 at Wijnegembaan 12, near the E313.

We approach the driver, who is Dutch, and introduce ourselves. He is open for a talk. We ask him if he is turning on the water system for the calves. He says he is not, as he already stopped in Kortrijk, Belgium, for 15 minutes to provide water for the calves on board. However, we have been following Hamanitra since the Fresness toll station in France and he did not stop in Kortrijk.

Inadequate water systems

The driver mentions that his truck has water nipples only, along with levers (each with a flap door in front of it) in the corners of his truck that calves have to push with their noses to get water out. He says that the rubber teats that were used a few years ago to cover the nipples do not work effectively as they tend to fall off or tear. Upon inspection, we find that indeed no water comes out of the nipples. Additionally, his water systems – metal nipples and valves – are not suitable for unweaned calves. Calves have the natural need to suckle and are unfamiliar with water systems they have to push. Thus, the Hamanitra truck is clearly not equipped to provide water to the calves adequately, let alone feed them. The driver confirms that giving milk to the calves on board of trucks is not possible because milk will clot.



The drinking systems in the Hamanitra truck are not adequate for unweaned calves, who are used to suckling and are not familiar with systems that they have to push with their noses in order to get water out. Left photo: metal nipples, originally designed for pigs. Right photo: Valve behind a metal flap door – originally designed for adult cattle.

Additionally, the driver mentions that he did provide water to the calves on the Stena Vision Ferry (which was a journey of 17.5 hours this year). To do so, he had to go down into the ferry, which is something several of his colleague drivers do not do. Plus he then also needs to add extra straw inside his truck to keep the bedding dry, which adds extra work for him. Regarding the violations of the feeding intervals, the driver claims that Irish authorities accept 22 hours (instead of the 19

hours outlined in EU Council Regulation No 1/2005). We have not heard about this ruling and it is in violation with the Council Regulation.

Hungry calves only 2-3 weeks old

We notice that the calves on board of the truck are very young. The driver says they are 2-3 weeks old. He informs us that he refused to load a few calves at the assembly center in Ireland because he considered them too weak for export. He claims to have rarely experienced calf mortality at the final destination due to his 25 years of experience and his strict criteria for accepting calves. Nevertheless, the calves are clearly very hungry, bawling and desperately suckling on our hands and the metal bars of the truck, which are all signs of hunger. The calves are Angus and Holstein breeds.



Calves are bawling loudly and suckling our fingers and the metal bars of the truck; all signs of hunger

We discuss footage from previous years showing calves being mistreated at the control posts near Cherbourg. The driver says that sometimes you have to be firm with the calves, as otherwise they do not stop drinking. The driver says he is going to unload the calves at a control post from Pali Group.

15:00 Hamanitra arrives at the control post 'Kempense exportstal' in Merksplas, Belgium. This is not an control post from Pali Group, as the driver of Hamanitra claimed. The journey from the Qualivia control post in Tollevast (FR) up to the Kempense exportstal control post in Merksplas (BE) took 9 hours.



Hamanitra arriving at the control post in Merksplas to rest the calves before further transport to Poland

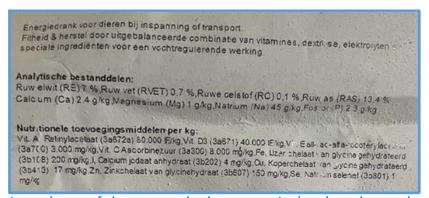
The owner of the control invites us for a coffee and a talk. He expresses his frustration with what he perceives as excessive requirements imposed by Dutch officials, which led him to relocate to Belgium.

He informs us that the calves will be unloaded only after a couple of hours because the driver arrived too early. This further extends the calves' total journey time on board the truck without any food nor water. Hamanitra left Qualivia in Tollevast at 06:03. If the truck has to wait for a couple of hours, the journey will exceed 9 hours, and the calves should at least be given water on board of the truck. We did not see this happening during our presence, which was until 15:48. The owner stated that the calves were heading to a farm just across the border in Poland. However, later, through Freedom of Information requests, we learned that the farm was not "just across the border" but located in Dolsk, much further into Poland.

15:48 We decide to stop the trailing here as the calves are heading to Poland and our focus right now is calves going to The Netherlands. We leave the premises.

No milk, just energy drink

In 2023 Eyes on Animals also saw Irish calves at the "Kempense exportstal" control post. During that time, calves were given energy-drink only (called FIT-to-GO) during their 24-hour rest period, so no milk, before further transport to Poland. Please refer to the ingredients below, which were provided to us by the owner. At the time, we raised concerns that calves should be given milk, not just an energy drink, but the owner disagreed and refused to make any changes, insisting that his food experts knew better after years of experience than we did.



Ingredients of the energy drink given at Irish calves during their 24hrs rest at the control post

16:30 Unloading of the calves starts (estimation)

17:33 We receive a video from the owner, showing the Irish calves from the Hamanitra truck being given energy-drink. The footage shows a transparent yellowish liquid, which is clearly not milk. This

means that this year the calves again only receive energy-drink and not milk as required by EU Council Regulation No 1/2005.



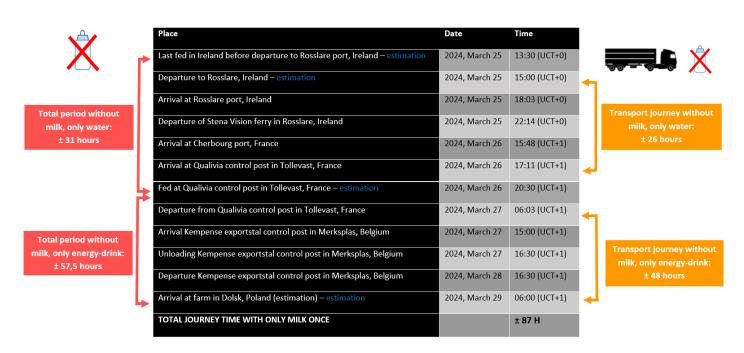
Calves at the Kempense exportstal" controlpost receiving energy-drink only and no milk

On April, 9th we sent the owner of the Kempense exportstal in Merksplas an official email. We express him our concerns that – him not feeding the calves milk and just energy-drink – means than the calves will be deprived of food for over two days. This exceeds the maximum feeding interval stipulated in the EC Regulation and is also morally unacceptable. We supported our findings with the expert opinion of Dr. Ronald Rongen from Low Stress Stockmanship Europe, a veterinarian and specialist in bovine welfare and health, regarding the FIT-to-Go energy drink for calves. His full opinion can be found in the green box below. Nevertheless, the owner maintains his belief that energy drink is better than milk.

Ronald Rongen, veterinarian and expert on the welfare and health of bovines:

"There is virtually no Crude Protein in it (7%). Calf milk powder often contains > 20% Protein. It contains only 0.7% Crude Fat. Calf milk powder often contains > 17% Crude Fat. The Propylene Glycol in the mixture increases the supply of glucogenic energy needed to facilitate metabolic processes in the calf. In short, it is merely a stimulant to make calves appear active, without providing them with real energetic nutrition. I can only describe this as a stimulant."

TIMETABLE HAMANITRA (54BVF6 / OV32GS)



Trailing Martin O'Neill - Irish calf truck (S700COW)

Wednesday, March 27th

18:25 We spot the truck of Martin O'Neill (S700COW) on the A27 (NL). Martin O'Neill left Pignet control post in Couville at 06:57 in the morning, so it has already been on the road for approximately 11.5 hours.



19:06 Still behind O'Neill. We are on the A28 and he then takes the exit Maarn (NL).

19:55 He takes the exit Hardenberg (NL)

20:14 We arrive at the final destination, a large veal factory farm located on Veldweg in Dalfsen (NL). The farmer approaches us and we introduce ourselves. We kindly ask him if we can see a portion of the unloading process. The farmer says no and prompts us to leave. Due to the darkness, we are unable to take clear photos or video and we do not want to provoke. Thus we leave Dalfsen and do not see any of the unloading of the calves or conditions for them upon arrival.

This farm resembles a typical, but large, Dutch veal farm. In 2020 this farm housed 2644 calves in total, which is way more than average. At a typical Dutch veal farm calves are initially housed individually in small pens with slatted floors until they are up to 8 weeks of age. After 8 weeks the calves are housed in small groups, in barren pens and still with slatted flooring. The calves will never have the opportunity to go outside, graze, enjoy the sun or grass outside their pens. They never receive bedding either but live above their own slurry.

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¹ https://www.alfa.nl/barneveld/actueel/verhuizen-naar-dalfsen-met-hulp-van-een-accountant



Final destination of the Irish calves on board of the Martin O'Neill truck; a large veal farm in Dalfsen. Photo's: Google Maps.



Martin O'Neill parked at the final destination; a large veal farm in Dalfsen.

According to the journey log of Martin O'Neill, loading of the calves onto his truck in Ireland began on March 25th at 14:00. This results in a total journey time from the Irish assembly center to the farm in Dalsen of 54 hours and 14 minutes. During this period, the calves were fed only once at the Pignet control post in Couville, France. EURCAW and EFSA recommend that calves of this age should have received food at least four times within this timeframe.

TIMETABLE MARTIN O'NEILL (S700COW)



Trailing Hinde - Irish calf truck (181D18727)

Wednesday, March 27th

10.40 Hinde passes the <u>Aire de Croixrault</u> gas station on the A29 (FR). Hinde has left Qualivia control post in Tollevast at 06:19 in the morning, so is now on the road for just under 4.5 hours.

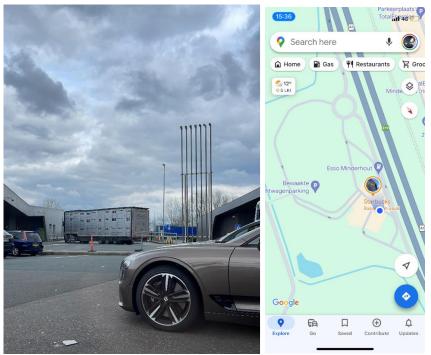
10.48 Behind the Hinde truck. Licence plate: 181D18727.



11.05 Hinde truck parks after toll point <u>Gare de Péage de Jules Verne</u>. For safety reasons we have to pass the truck.



15:10 We spot the Hinde truck again at the moment it arrives at the <u>Esso petrol station in</u> <u>Minderhout</u> on the A1/E19, Belgium. We hear the calves bawling. The driver parks the truck and is heading off to the Esso store.



The driver parks his truck at the Esso petrol station and heads to the shop

We decide to check on the calves and film some ear tags. Some calves are standing alert, while others are lying down; a few of these have their heads tucked in, indicating exhaustion. Many of the calves in this truck appear to be Angus breeds, with some being Holstein/Friesian crosses. Additionally, we notice several calves with snotty noses and diarrhea.



Some calves are alert and standing, while others are sleeping with their heads tucked in (a sign of exhaustion)

There are teats located in the corners of the truck that we are unable to reach to test if water is being dispensed, and we haven't observed any calves drinking from them. These teats are likely designed for piglets and sheep, as they require pressing (rather than suckling) to release water. This mechanism makes them unsuitable for unweaned calves.



Teat in the corner of the truck unsuitable for calves





On board, we notice a few calves with runny noses and diarrhea.

The driver returns after about 10 minutes and urges us to leave. We attempt to communicate with him, but he is not understanding. We decide to return to the car and wait for the Hinde truck to continue its journey.

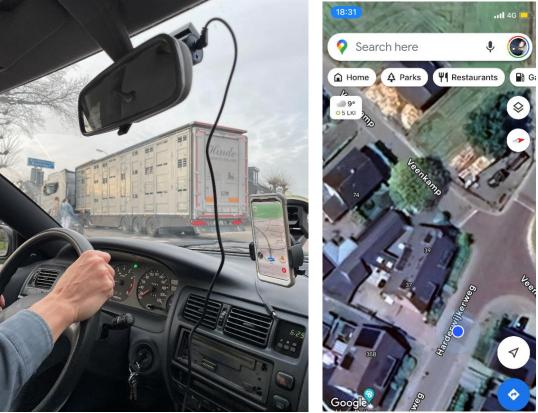
16:10 The Hinde truck leaves the Esso petrol station exactly one hour later than it arrived, indicating that the driver likely took the required 1-hour break after 9 hours of travel to water the calves, as mandated by EU Council Regulation No 1/2005 Annex I, Chapter V, point 1.4a. However, there is no indication that the water system was turned on; we did not witness the driver checking the water system, nor did we see any calves drinking from it. This failure to activate the water system is a violation of EU Council Regulation No 1/2005.

17:00 We are on the A27 heading direction Utrecht (NL)

17:35 We take the exit direction Zeist (NL)

17:50 We take the exit onto the A1, direction Apeldoorn (NL).

18:15 The Hinde truck takes the exit towards Uddel (NL) and enters a residential area. The truck stops on Harderwijkerweg in Uddel, and the driver begins talking to another driver from a parked car nearby. The atmosphere becomes tense.



The Hinde truck stops at a residential area on the Harderwijkerweg in Uddel (NL)

18:35 We decide not to take any risks and end our pursuit

18:45 We know that the destination of this truck is a farm in Elspeet. Elspeet is approximately 10 kilometers away from the place where we last saw Hinde (Harderwijkerweg in Uddel). It is a smaller-than-average farm with approximately 400 calves. This screenshot is taken from Google Maps.



Final destination of the Irish calves on on board of the Hinde truck; a small veal farm in Elspeet. Photo: Google Maps.

TIMETABLE HINDE



<u>Trailing unknown company, built by Michieletto – Irish calf truck</u> (191WH1407)

Wednesday, March 27th

11:14 A calf truck from an unknown company passes us on the <u>Aire de Villers-Bretonneux</u> petrol station. License plate: 191WH1407. The truck has a sign of Michieletto at the back – which is an Italian manufacturer of livestock trailers. For practical reasons we therefore call the truck "Michieletto".



14.40 The truck stops at a weighbridge next to <u>Aveve Mertens Meer</u>, located at Minderhoutsestraat, Hoogstraten, Belgium. After the truck leaves the weighbridge, we lose sight of it due to heavy traffic.



15.50 We spot the Michieletto truck again at the assembly center "<u>Selectie Centrum België</u>". Address: Hoogeind 109B, 2321 Hoogstraten, Belgium. The Irish driver is removing the dirty straw from the truck. The driver explains that the calves have been unloaded and fed after the required 9 hours of travel. They will be now loaded onto a new truck, which will bring the calves to their final destination: a veal farm in the Netherlands. We estimate that the time of arrival at Selectie Centrum België was approximately 14:50.

The truck that will transport the calves to the veal farm has arrived. It is a Dutch truck from Gerwin van Beek International Veetransport with the license plates O7BNT1 (front) and OT05ZT (back).

We attempt to speak with another Dutch driver, whom we believe is the driver from the Gerwin van Beek truck transporting the calves to the veal farm. However, we are not allowed to inspect the calves and are asked to leave

16.38 The truck from Gerwin van Beek is loaded with the Irish calves originally from the "Michieletto truck" and is waiting to leave the premises.

16.55 Departure of the Gerwin van Beek truck



18.27 We followed the truck until just before the Hoevelaken junction on the A28 (NL), where we lost sight of it. As a result, we do not know the final destination of the calves. However, through a Freedom of Information Request, we discovered that the farm is located in the Netherlands and that the truck arrived there at 21:30.



21:30 Arrives at the Dutch farm (exact location unknown) according to the journey log we obtained later via the Freedom of Information Act.

FALSE AND INCORRECT JOURNEY LOGS

Through a Freedom of Information request, we obtained and analysed the journey logs of the eight companies involved in transporting calves from Rosslare port on March 25, 2024. Our analysis focused on verifying the accuracy of the logs, comparing them against the journey times documented by our teams (particularly for the four trucks we monitored closely: Hamanitra, Martin O'Neill, Hinde, and Michieletto), and identifying any irregularities.

Findings

Incorrect and missing information

Many of the journey logs received under the FOIA were missing mandatory information, were full of errors and/or had journey times (section 4) that did not correspond to the actual journey (false information). Main findings:

Six out of eight transport companies filled in their journey logs incorrectly and/or incompletely. This may have been done on purpose to create the illusion that calves were on board the trucks for a shorter period of time than they actually were.

	Information correct?	Information complete?
Hamanitra (954BVF6 / OV32GS)	NO	NO
Martin O'Neill (S700COW)	YES	YES
Hinde (181D18727)	NO	NO
Michieletto (191WH1407)	YES	NO
Hinde (231D1063)	NO	NO
Hallissey (142MH1995)	NO	YES
O'Brien Bros (241D25383)	YES	NO
Unknown (231DL1603)	YES	YES

Six out of 8 companies had journey logs that were incorrect and/or incomplete. Narrow deviations (up to ± 30 minutes) we considered acceptable. We took into account that drivers sometimes use their own local times (instead of the country of origin).

- The journey log that stood out the most for being incorrect and incomplete was that of the Dutch Hamanitra truck (954BVF6 / OV32GS). Section 4 was entirely fabricated.
- Four out of the eight journey logs lacked loading times, which is crucial information as this marks the start of the journey time and is essential for calculating the duration calves are on board trucks without milk, necessary to ensure compliance with legal requirements.
- Five out of the eight journey logs displayed incorrect arrival times at Rosslare port. For instance, Hinde (181D18727) arrived 3 hours earlier than stated in his journey log. Hallissey's log (142MH1995) indicated an arrival 1 hour and 40 minutes later than the actual time, which was four hours before the ferry departure. These discrepancies suggest an attempt to mislead authorities by falsely indicating shorter waiting times for calves inside stationary trucks without milk, likely to circumvent the legal feeding intervals.
- Iwo out of the eight journey logs had incorrect ferry departure times.
- Hallissey's journey log indicated a violation of space requirements for the 331 calves on board his truck. Despite this regulatory standard the journey log was approved by the authorities.

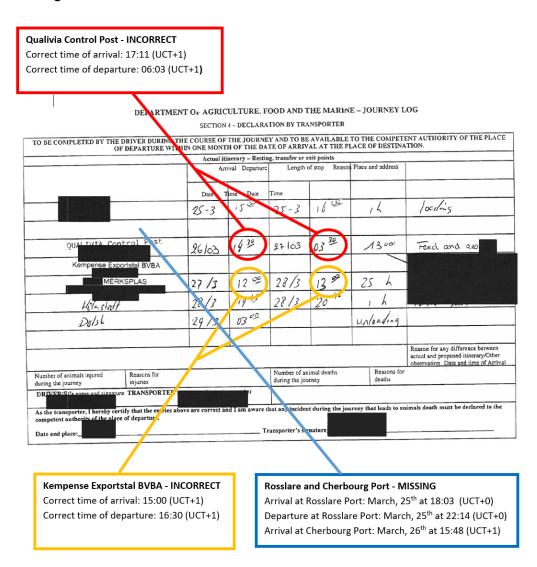
More about this violation can be read in the third example below.

Our findings once again indicate that, similar to previous years, authorities are not thoroughly checking journey logs or tachographs to ensure they accurately reflect actual journeys and are filled out correctly. In other words, transport companies are falsifying records with apparent impunity, while authorities appear to be turning a blind eye.

Examples of falsified journey logs

Example 1. Hamanitra (954BVF6 / OV32GS) - fabricated journey log

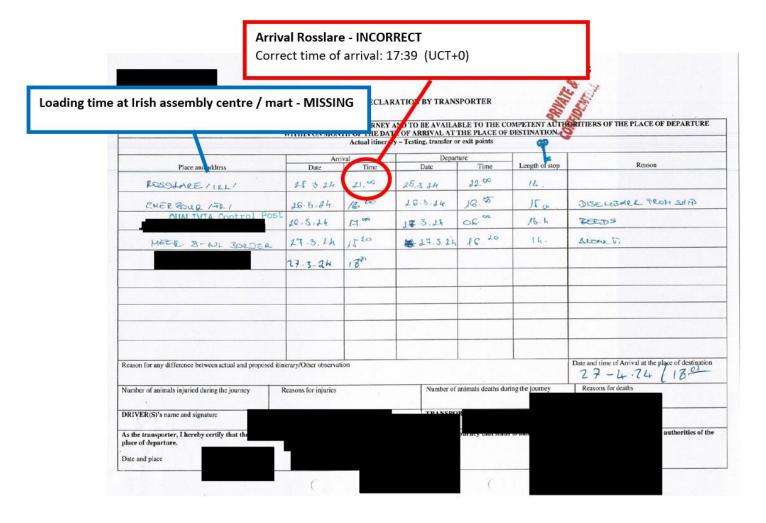
Hamanitra (Dutch) is one of the four trucks that our teams trailed. We documented all journey times from the arrival at Rosslare port in Ireland up to the arrival at the assembly center in Merksplas, Belgium. Therefore, we know that the times indicated by the driver on the journey logs are incorrect. The driver has falsified the journey times on his log, most likely to give the impression that the journey was much shorter than it factually was. In the illustration below you can read the journey log, illustrating that many times are incorrect and that several parts of the journey log are missing.



Example 2. Hinde (181D18727) - incorrect and missing journey times

The driver of Hinde recorded 21:00 as the arrival time at Rosslare Port in the journey log, while our teams documented that 17:39 was the actual time of arrival, revealing a discrepancy of 3 hours and 21 minutes. This means that the calves had to wait on board the truck without milk for a much

longer period than indicated on the journey log, suggesting an attempt to mislead the authorities.



Example 3. Hallissey – Irish calf truck (142MH1995)

This journey log of Hallissey shows that the stocking density is too high. There were 331 calves averaging 54kg with 106m² floor space. The Department of Agriculture, Food and the Marine Trader Notice AHW 01/2019 stipulates that calves of that size must have at least 0.332m² per calf, which would be a total floor area of 110m².

3.1 Place and country of DEPA IRELAND	RTURE	4.1 Place and country of DESTINATION			
3.2 Departure Date	3.3 Departure Time	4.2 Arrival Date	SPAIN		
25/03/202	15.00	27/03/2024	21.00		
5.1 Species UNWEANED BOVINES	5.2 Number of animals		5.3 Veterinary certificate(s) number(s) Local reference number		
5.4 Estimaved total weight of	the configuration to	INTRA number:			
5.4 Estimated total weight of the consignment (in kg). 18,000KG		5.5 Total space provide 106 M ²	5.5 Total space provided for the consignment (in m²): 106 M²		

Planning violates feeding intervals, yet approved by Irish authorities

The planning (Section 1) of the journey logs often only shows the journey starting from the Port of Rosslare. However, the actual journey starts when the first calf is loaded onto the truck at the assembly center in Ireland. This crucial part is often excluded from the planning, likely to create the

impression that calves are on board the trucks for far fewer hours than they actually are. Omitting the Irish assembly center also makes it impossible to calculate the total journey time, which is necessary to ensure compliance with EU Council Regulation No 1/2005's feeding times.

But even without this part of the journey, the feeding intervals of maximum 19 hours are violated by 2-3 hours, as you can see in the example of Hamanitra below. In reality, based on our observations, the feeding intervals are often exceeded by more than 10 hours, up to even 29 hours.

If a calculation is made on the journey logs that did record the time of loading at the Irish assembly center, see the example of Hallissey below, it is even more clear how much the feeding interval is violated. In Hallissey's case the maximum feeding interval of 19 hours is exceeded by more than 10 hours.

Although the journey logs provide hard proof that unweaned calves are on board trucks for much longer than the maximum 19 hours without being fed, they continue to be approved by the Irish authorities. We find this completely unacceptable and urge the authorities to perform their duties properly and stop approving transports that cannot be conducted in accordance with EU Council Regulation No 1/2005.

Example 1. Hamanitra (954BVF6 / OV32GS) - planning indicates violation feeding intervals

6.1 Name of the places where			Departure		6.3	6.4 Transporter's name, address, phone
animals are to be rested, or transferred (including exit points)	Date	Time	Date	Time	Length (in hours)	number and authorisation number (if different from above)
Rosslare PORT	25/03	20.00	25/03	22.00	2 HOURS	
Cherbourg port	26/03	16.00	26/03	16.30	30 MINS	
Qualivia 2	26/03	17.00	27/03	06:00	13 HOURS	
KEMPENSE	27/03	14.00	28/03	14.00	24 HOURS	
SERVICES	28/03	22.00	28/03	23.00	1 HOUR	
DESTINATION	29/03	07.00				
						a children of the
						120

A calculation on the recordings on the journey log of this Hamanitra truck, conclude that the maximum feeding intervals of 19 hours are exceeded with 3 hours. From <u>our observations</u> we know that the recordings by the driver are incorrect and calves have been deprived of milk for 26-48 hours long.

Example 2. Hallissey (142MH1995) - journey log indicates food deprivation of > 30 hours

	CE OF DEPARTURE
KEEPER at the place of departure – Name and address	if different from the organiser mentioned in Section $(1)^{(i)}$
. Place and Member State of departure ^(b)	
3. Date and time of first animal loading ^(b) よしいしかしない。 Light first series (1997)	4. Number of animals loaded ^(b)
142 MH 1995	5(b) Vehicle Approval Number:
Signature of the keeper at the place of departure LAIN, CLO, THIRMING TO TO THE CANAL CHECKS AT DEPARTURE CONTROLLED	, valuation
VETERINARIAN at the place of departure (name and addr Department of Agriculture, Food and The Marine,	ess) District Veterinary Office, Spa Road, Tralee, Co kerry
I, veterinarian, hereby declare that I have checked and al According to my kaowledge, at the time of departure, the and the transport practices were in accordance with the p	pproved the loading of the animals mentioned above.
Signature of the VETERINARIAN	

Actual i	itinerary - Resti			ACE OF DESTIN	FENT AUTHORITY OF THE PLACE	
A		ng, transfer or				
	Arrival		Departure		Reason	
Date	Time	Date	Time			
		25.3	15.00			
25-3			21.00	14		
et 26.3	11.50	26.3	17.00	18 min	Pitters	
26.3	17:30	27.3	17.30	244	TEL 12::- 1	
28.3	03-30	283	4.30	117	Take a Land	
28:3	11.48					
sed itinerary/Other obser	rvation				Date and time of Arrival at the place of	
					destination 3/11/4 59	
Number of animals injured Reasons for unjuries parties of animals injured Reasons for unjuries parties of the pourse of the pour				Number of animal deaths Reasons for during the journey deaths		
				n nun		
Name ve are correct a	aware th	at any incident	during the jou	leads to al.	mais death soust be declared to the	
	25°3 26°3 28°3 28°3	25.3 20.00 26.3 14.50 26.3 17.30 28.3 36.30 28.3 11.49	25.3 20.00 25.3 25.3 26.3 17.30 27.3 28.3 11.49 Sed itinerary/Other observation	25.3 25.00 25.3 15.00 25.3 17.00 25.3 17.20 27.3 17.50 28.3 17.49 28.3 17.49 sed itinerary/Other observation	25.3 15.00 25.3 15.00 25.3 17.00 19 H 26.3 17.30 27.3 17.30 26.4 28.3 17.49 27.3 17.30 17 28.3 11.49 17 28.3 11.49 Reasons for deaths during the journey feaths a number of animal deaths during the journey feaths and the second feaths and the	

In Hallissey's case the journey from the point of loading at the assembly center (March, 25^{th} at 12:00) up to unloading at the control post Pignet in Couville, France (March 26^{th} at 17:30), the calves were deprived of feed (milk) for over 30 hours.

VIOLATIONS

The most alarming violations that continue to be observed on the route from Ireland to The Netherlands, Spain and Poland are:

1. Calves transported from Irish assembly centers to control posts near Cherbourg (FR) are confined on board trucks for over 30 hours without being fed milk. This violates EU Council Regulation No 1/2005, which mandates calves be fed after a maximum of 19 hours (9 hours driving + 1-hour onboard break + 9 hours driving) (Annex I, Chapter V, points 1.4(a) and 1.5). This violation has been confirmed by an audit by the European Commission conducted in June 2022. This year we witnessed that calves who are further exported to Poland via the assembly center "Kempense exportstal" in Merksplas (Belgium) are deprived of food (milk) for a second very long period (>48 hours) because in Merksplas - where the calves are rested for 24 hours - they only get energy drink and no milk.

The same articles (EU Council Regulation No 1/2005 Annex I, Chapter V, point 1.4(a) and 1.5) stipulate that calves - if necessary - should also be fed during the 1 hour rest after 9 hours of travel. It is widely acknowledged, within the industry and by authorities, and recently also confirmed by EFSA², that calves cannot be fed milk on board of trucks. So, despite the legal requirement to be able to feed calves after 9 hours of travel, in reality this never happens.

EU Council Regulation No 1/2005, Annex I, Chapter V, point 1.4

1.4. The watering and feeding intervals, journey times and rest periods when using road vehicles which meet the requirements in point 1.3. are defined as follows:

(a) Unweaned calves, lambs, kids and foals which are still on a milk diet and unweaned piglets 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;

EU Council Regulation No 1/2005, Annex I, Chapter V, point 1.5

After the journey time laid down, animals must be unloaded, fed and watered and be rested for at least 24 hours

2. Calves at Hallissey's assembly center were repeatedly hit hard on their backs and heads sticks with paddles, and at one point even a pitchfork. The paddles are often lifted above shoulder height to inflict more force and pain on the calves. The unweaned calves are also kicked and repeatedly dragged and lifted by their ears and tails (which is painful as it is connected to the spine). This is in violation with EU Council Regulation No 1/2005 (Annex I, Chapter III, 1.8) and Council Regulation (EC) No 1255/97 (Article 5 and Chapter III, 1.8).

EU Council Regulation No 1/2005, Annex I, Chapter III, 1.8

It shall be prohibited to:

(a) strike or kick the animals;

(b) apply pressure to any particularly sensitive part of the body in such a way as to cause them unnecessary pain or suffering;

(d) lift or drag the animals by head, ears, horns, legs, tail or fleece, or handle them in such a way as to cause them unnecessary pain or suffering;

EU Council Regulation No 1255/97, Article 5

The owner or any natural or legal person running a staging point shall be responsible for compliance with the relevant provisions of this Regulation and, to that end, shall be obliged:

(d) to care for the animals staying at staging points and, where required, take all necessary steps to guarantee their welfare and compliance with animal-health requirements;

(f) to use staff who possess the appropriate ability, knowledge and professional competence and have for that purpose received specific training either within the undertaking or from a training body or have equivalent practical experience qualifying them to handle and, if necessary, administer appropriate care to the animals concerned;

(g) to take the necessary steps to ensure that all those handling animals at staging points comply with the relevant animal-welfare provisions;

3. The remains of many calves and cows were found in varying stages of decay, lying in puddles of water behind one of the buildings. Many had their eyes missing, presumably pecked out by birds or eaten by rats. Some were skeletal, others looked more recently deceased. This is in violation of Article 21.1 of Council Regulation (EC) 1069/2009 that states that: "Operators shall collect, identify and transport animal by-products without undue delay under conditions which prevent risks arising to public and animal health." Animal by-products are defined as "entire bodies or parts of animals, products of animal origin or other products obtained from animals, which are not intended for human consumption, including oocytes, embryos and semen". Operator is defined as "the natural or legal persons having an animal by-product or derived product under their actual control, including carriers, traders and users". Guidance from the competent authority of Ireland states that an animal collector must be contacted as soon as possible after the discovery of the death of an animal, yet they are clearly being left for several weeks or months.

EU Council Regulation No 1069/2009, Article 21

Collection and identification as regards category and transport

- 1. Operators shall collect, identify and transport animal by-products without undue delay under conditions which prevent risks arising to public and animal health.
- 4. At the assembly center "Kempense exportstal" in Merksplas (BE), calves were not provided with milk during their 24-hour rest period. Instead, they were given an energy drink designed to make the calves appear active. Dr. Roland Rongen from Low Stress Stockmanship Europe, a veterinarian and expert in the welfare and health of bovines, determined that the energy drink contained very low levels of Crude Protein (7%) and Crude Fat (0.7%), indicating it cannot be considered as food but rather a stimulant to enhance calf activity.

EU Council Regulation No 1/2005, Annex I, Chapter V, point 1.4

- 1.4. The watering and feeding intervals, journey times and rest periods when using road vehicles which meet the requirements in point 1.3. are defined as follows:
- (a) Unweaned calves, lambs, kids and foals which are still on a milk diet and unweaned piglets 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;

EU Council Regulation No 1/2005, Annex I, Chapter V, point 1.5

After the journey time laid down, animals must be unloaded, fed and watered and be rested for at least 24 hours

5. The competent authority of Ireland (Department of Agriculture, Food and the Marine) fails to conduct adequate checks to ensure journeys comply with EU Council Regulation No 1/2005 and accurately reflect the actual journey. Journey logs obtained under the Freedom of Information Act (FOIA) frequently included falsified journey times that did not match the actual journey. Additionally, crucial information such as loading times at the Irish assembly center (sections 1 and 4 of the journey log) was often missing. This omission is critical because it marks the start of the journey and is essential for verifying compliance with feeding intervals under EU Council Regulation No 1/2005. However, even without this crucial information, the journey logs clearly indicated non-compliance, as the journey from arrival at Rosslare Port up to the control post in Cherbourg already exceeded the maximum feeding interval of 19 hours stipulated by EU Council Regulation No 1/2005. Despite our repeated notifications, the DAFM continues to approve them.

Furthermore, we also documented a journey log clearly indicating overcrowding that was nevertheless approved.

EU Council Regulation No 1/2005, Chapter III, article 14

Checks and other measures related to journey log to be carried out by the competent authority before long journeys

- 1. In the case of long journeys between Member States and with third countries for domestic Equidae and domestic animals of bovine, ovine, caprine and porcine species, the competent authority of the place of departure shall:
- (a) carry out appropriate checks to verify that:
- (ii) the journey log submitted by the organiser is realistic and indicates compliance with this Regulation;
- (b) where the outcome of the checks provided for in point (a) is not satisfactory, require the organiser to change the arrangements for the intended long journey so that it complies with this Regulation;

EU Council Regulation No 1/2005, article 15, point 1 and 4

Checks to be carried out by the competent authority at any stage of a long journey

- 1. The competent authority shall carry out at any stage of the long journey appropriate checks on a random or targeted basis to verify that declared journey times are realistic and that the journey complies with this Regulation and in particular that travel times and rest periods have complied with the limits set out in Chapter V of Annex I
- 4. The records of the movements of the means of transport by road obtained from navigation system may be used for carrying out these checks where appropriate

Responsible parties

There are several parties involved and responsible for the ongoing violations:

The competent authority of Ireland (Department of Agriculture, Food and the Marine):
 They continue to approve the export of unweaned calves to the European continent despite knowing that feeding intervals are grossly violated. They also fail to properly check the journey logs, assembly centers, and control posts.

- 2. **VanDrie Group:** As the main importer of unweaned calves from Ireland to the Netherlands, they continue importing very young calves despite being aware of these ongoing violations.
- 3. **Transport companies:** They fail to feed the calves properly and on time and do not fill in their journey logs correctly and completely.
- 4. **Authorities from importing countries**, such as the Dutch Food and Consumer Product Safety Authority (NVWA) in the Netherlands and the Subdirección General de Sanidad e Higiene Animal y Trazabilidad in Spain, have the power to stop the import of calves if the journeys do not comply with EU Council Regulation No 1/2005, yet they fail to do so.
- 5. **The Belgian authorities (FAVV):** They should enforce actions against the Kempense Exportstal in Merksplas (BE) for refusing to provide proper feed (milk) to the calves.
- 6. The owner/manager of the Hallissey assembly center: They fail to properly train their workers and oversee operations to prevent the mishandling and abuse of calves. Deceased animals are not disposed of correctly.
- 7. Ferry operators Stena Line and Irish Ferries: The failure to comply with the feeding requirements laid down in Chapter V of Annex I means that they are in breach of Article 6.3 of EU Council Regulation No 1/2005, which provides that "Transporters shall transport animals in accordance with the technical rules set out in Annex I."
- 8. The competent authority in France (Ministere de l'Agriculture et de la Souverainte Alimentaire): At the point where Stena Line, Irish Ferries and the road transport trucks enter France, they are carrying the calves in breach of EU Council Regulation No 1/2005, yet the French authorities do not take any action.

¹ https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2022.7442 (page 75)

² https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2022.7442 (page 75)