



Minister Dara Calleary
Department of Agriculture, Food & the Marine
Agriculture House
Kildare Street
Dublin 2

Please reply to:
info@ethicalfarmingireland.com

3rd August 2020

Dear Minister Calleary

Formal Complaint

Subject: Breaches during the loading of young bulls for export from Ireland of EU Regulation 1/2005 on the protection of animals during transport

Ethical Farming Ireland would like to request an investigation in to the following observations made during the loading of young bulls for export at Cork Port on Wednesday 29/07/20. A number of breaches of EC Regulations 1/2005 have been noted in connection with this loading.

Departure Port: Cork, Ireland
Vessel: The Sarah M
Destination: Port Misrata, Libya, North Africa
Date of loading: 29/07/20
Date of Departure: 30/07/20
Estimated Arrival Date: 08/08/20

Chapter I Article 3 General Conditions for the transport of animals – No persons shall transport animals or cause animals to be transported in a way likely to cause injury or undue suffering to them.

(e) the personnel handling the animals are trained or competent as appropriate for this purpose and carry out their task without using violence or any method likely to cause unnecessary fear, injury or suffering.

Observation: the handlers were coming at the animals with paddles and long sticks from all directions causing stress and confusion. I have footage showing a handler run up the ramp with a stick causing one of the bulls to try to turn and run back down. Bulls were observed mounting each other in the gangway, bunching together and trying to get back into the truck because handlers were waving paddles and sticks, blocking their way. I have footage of a handler hanging out the side of the vessel next to the entrance at the top of the ramp, banging the side with a stick making a lot of noise. This caused the animals to be fearful of entering the vessel, whilst behind them other handlers were shouting, waving and banging with paddles and sticks. It's no wonder the animals were so stressed and confused.
Please refer to video evidence attached.

Annex 1 Chapter III Transport Practices

1.3 (a) prevent injury and suffering and minimise excitement and distress during animal movements as well as ensure the safety of the animals.

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;

(f) knowingly obstruct any animal which is being driven or led through any part where animals are handled.

(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;

Observation: some of the handlers were seen to hit the animals around the body and head with paddles and long sticks. One handler was seen kicking the animals. Another handler was seen on a number of occasions to twist the bull's tail and pull it up over the rump, tugging on it to try to get the bull to move. The tail is a sensitive area and is also connected to the spine. These actions could have caused serious harm and injury to the animals. As stated above, some handlers were observed waving paddles and sticks in front of the animals preventing them from going along the gangway.

Please refer to video evidence attached.

I have witnessed several loadings and this one was particularly bad. One bull was clearly lame, limping up the ramp and into the vessel. I have seen tail bending like that in a Turkish slaughterhouse. I would not expect to see that kind of brutality in Ireland. Under the programme for government it states 'Recognising the importance of animal welfare, the new Government will provide additional resources to monitor welfare standards, by increasing the veterinary presence available on all live export consignments to third countries.' Where were these vets when these breaches were carried out? I didn't see any vets at all. I assume they were in the trailer sheltering from the rain. Can you please confirm how many vets were present and explain why they didn't intervene when the handlers clearly needed guidance? Is there a vet accompanying the shipment?

The European Court of Justice ruled in April 2015 that Council Regulation 1/2005 – including Annex I of the Regulation, continues to apply to the place of destination in countries outside the EU, including Third countries. The animals transported on the Sarah M will be unloaded onto trucks and continue the journey to their final destination in temperatures far exceeding the 30°C degree limit set out in Chapter VI of Annex I. It seems highly unlikely that the means of transportation for the cattle will have ventilation systems capable of maintaining the required 30 degrees. This part of the journey should be covered by a journey plan and log, as set out in Chapter II of EU Regulation 1/2005, but when requested previously under the Freedom of Information Act 2014 I was informed that DAFM does not have such documentation. Furthermore DAFM imposes a ban on road transport to North Africa in July and August. Once unloaded from the vessel on 8th August these animals will have to continue the journey by road, possibly for many hours, in extreme heat. It is currently 35 degrees in Misrata.

From the evidence provided Ethical Farming Ireland politely requests the Minister's response to the above.

Yours sincerely



Caroline Rowley
Ethical Farming Ireland