



Eyes on
Animals | Watching
out for their
welfare

COMPASSION
in world farming



22nd November 2022

Minister Charlie McConalogue
Minister for Agriculture, Food & the Marine
Agriculture House
Kildare St
Dublin 2

Please Reply to:
info@ethicalfarmingireland.com

Dear Minister

Meeting request to discuss Irish cattle discovered at inhumane slaughterhouses in Lebanon and Jordan

Every year Ireland exports thousands of young bulls to countries outside the EU. These exports usually involve a long sea journey in livestock vessels to countries known to have poor animal welfare standards with very little in the way of regulations, particularly at slaughter. NGOs have been gathering footage of inhumane slaughter in these countries for many years but, despite having full knowledge of the cruelty involved, these shipments are not only allowed to continue, new markets have been sought in Jordan and Egypt with two shipments going to each this year. Shipments are also resuming to Turkey. It is ethically unacceptable to send animals to countries when it is known that slaughter methods practised do not meet international standards, as set out by the World Organisation for Animal Health (OIE.)

Concerns around importing countries repeatedly ignored by Authorities

Animals International, Compassion in World Farming, Eyes on Animals and Ethical Farming Ireland (EFI) have all submitted numerous complaints and concerns to yourself and your predecessor Ministers over the years, both around the sea journeys and the brutal slaughter the exported animals are subjected to. The responses that we have all been receiving skirt around the issues raised, and instead rehash the mantra: it is a highly regulated industry; the welfare of the animals is of the utmost importance; yearly financial contributions are given to the OIE; the animals are all vet checked before loading; the vessels are all inspected and certified for use and responses from the Department for Agriculture, Food and the Marine (DAFM) have even suggested that cattle in North Africa are slaughtered in a similar manner to here, despite being sent evidence to the contrary. See Annex 1. A recent investigation into live export by Noteworthy quoted DAFM as stating “any concerns or allegations relating to non-compliance outside the State should be provided to those competent authorities”. Your department is shirking all responsibility for the animals once they have disembarked the vessel.

This repeated denial of the reality behind the industry is extremely concerning. Furthermore, investigations by EFI over the past six years have uncovered issues with vessels that have been brushed over and approval has been granted despite the risks to the animals on board. Examples include foot battens on ramps below minimum size (meaning cattle will slip and potentially injure themselves,) extreme rusting and vessels not compliant with regulations concerning roll periods (meaning the vessels will pitch and roll excessively in choppy seas.) See Annex 2. There is a pattern of vessels being granted certificates of approval on the understanding that issues will be addressed at a later date which is not acceptable - any problems with a vessel should be addressed immediately and shipments should not be permitted until the vessels are fully compliant.

NGOs uncover breaches

The Regulations in Ireland may be of a higher standard than EU requirements on paper, for example vessels must have a white flag, certification approval requires an inspection by both a DAFM veterinary official and a marine surveyor, the certificate of approval for the vessel must have been issued in Ireland and the operating company cannot be listed as low performing by the European Maritime Safety Authority (EMSA.) However, in late 2019 EFI discovered that all three vessels approved for use at the time did have operating companies listed as low performing by the EMSA. Minister Creed was informed of this in December 2019, yet a few weeks later a shipment was allowed to leave Ireland for Libya full of cattle, despite having an invalid certificate of approval. The approvals were all revoked eventually but shortly after all three acquired new operating companies that had the same address, telephone number and director as the previous companies. It seems there was a change of name and perhaps nothing else. Minister Creed was informed of concerns around this but said it was a matter for the EMSA, not DAFM, again shirking responsibility.

In January 2022 a shipment of cattle was sent to Libya in livestock vessel Finola M. When copies of the accompanying documents were obtained under the Freedom of Information Act it transpired that 305 sheep travelled with that shipment. However, the certificate of approval for the Finola M, obtained under a Freedom of Information (FOI) request, did not list sheep, the vessel was only approved to carry bovines. Furthermore, the inspection reports clearly state that the “application has been made in relation to the carriage of **cattle** by sea from Irish ports.” There is no mention of sheep in either report. Further investigations and FOI requests revealed a note from a veterinary inspector stating that he gave permission for sheep to be loaded. See Annex 3. No vessel inspection was conducted in relation to sheep, breaching the Carriage of Livestock by Sea SI 356/2016, as sheep have specific requirements. EFI wrote to you on 19th May 2022 and 30th August 2022 expressing concern that due process is not being followed and these certificates are amended whenever the need arises, to ensure that boxes are ticked. To date no response has been received.

It is worrying that an NGO is finding out these problems when DAFM should be conducting the checks themselves, this is meant to be a highly regulated industry after all.

According to the marine surveyor and veterinary inspection reports, all of the livestock vessels that operate from Ireland have stability issues and roll periods of less than 15 seconds, which means they will pitch and roll in stormy seas. The certification for all vessels, and the Carriage of Livestock by Sea SI stipulates that they cannot depart with livestock on board if the 96 hour weather forecast, that must be obtained by the captain, predicts winds of Beaufort 6 or stronger. The Irish Sea and Bay of Biscay are both notorious for choppy seas and almost every shipment hit winds of force 6 or above during the first leg of the journey, yet they are permitted to go ahead every time. EFI has submitted numerous complaints to you Minister, on this matter. See Annex 4 showing a recent shipment that hit stormy seas.

Loophole

A further concern is that cattle are being exported directly to Lebanon from ports in Spain and Croatia, not only in sub-standards vessels that would not be approved for use in Ireland, but there is no paper work at all for the journey from the departure port. The department has no idea how many cattle became sick, injured, or died during the journey. The journey log ends at the departure port and there is no further documentation required. For example in October 2019 cattle were unloaded from a Hallissey truck at Rasa port in Croatia and loaded onto livestock vessel Lady Rasha, a black flag vessel that would not be approved in Ireland. In July 2022 five truckloads of cattle were loaded onto livestock vessel Karim Allah at Tarragona port for Lebanon, a grey flag vessel. See Annex 5. The Karim Allah was one of two vessels that spent two months at sea crossing from Turkey to Libya trying to offload the cattle that could not be accepted due to incomplete paperwork. All cattle on board finally returned to Spain and were euthanized.

Health and welfare concerns during transport

Cattle are land animals and can suffer from motion sickness in the same way we can. They also slip when pens become soiled and as the sea journey continues temperature and humidity rise. The standards are supposedly very high but during most journeys a number of bulls become sick or injured, some die and some are euthanized. During a shipment to Jordan in March 2022 in livestock vessel Finola M, 41 bulls

suffered from leg injuries and respiratory illness and 3 died of unknown causes. In May during another shipment to Jordan 5 bulls died and 24 suffered from leg injuries and respiratory illness. A DAFM vet was on board and stated in his report that ventilation was good, yet the temperature reached 30 degrees and humidity 78%. Those animals will have suffered varying degrees of heat stress and it's no wonder respiratory illness is so prevalent. During a shipment to Egypt in August 2022 temperatures reached 33 degrees and humidity 89%. The cattle on board will have suffered from mild heat stress from day 1, increasing to severe heat stress by day 5. See Annex 6.

The veterinary report from the Jordan voyage also made reference to feed rations. It stated that too much concentrate was fed to the bulls. This created excessive amounts of dung causing pens to be slippery, hence the leg injuries. Yet we are led to believe the pens are cleaned regularly and the bulls well looked after. In his recommendations the vet stated the decks should be treated to make them non-slip before the next approval inspection which is due in March 2023. That is shocking; the issue should be dealt with now not in 10 months' time after numerous shipments have gone ahead. A shipment left Greenore port for Egypt in August in the Finola M, a 12 day sea journey with around 1,800 bulls on board, and another left in September in the same vessel. The veterinary report again referenced slippery decks and six animals suffered from leg injuries. See Annex 7.

A further point to note from the Jordan shipment in May is that the vet said in his report that he did not observe the unloading of the animals as he had to get his visa. He then stated that the unloading took 5 – 6 hours and was done at midnight so it was cooler. Why did it take 6 hours to get a visa and why spend 16 days on a vessel only to miss the unloading which is a vital part of the process? Loading and unloading can be the most stressful part of a journey for animals. It is also well known that transport vehicles in these countries are generally open topped industrial trucks not designed to carry livestock, so it is unfortunate the vet did not see how the animals were being transported in the next stage of the journey. Under the Court of Justice Zuchtvieh ruling (Case C-424/13), EC Regulation 1/2005 remains in place until the final destination is reached and the port of arrival is not the final destination. However, the paper trail ends once the animals are unloaded. EFI has previously requested paperwork for the latter part of the journey from DAFM only to be told to go to the local authority, which is at odds with the requirements of the Regulation.

Issues regarding logging of sickness and injuries

Each shipment has to be approved by the Minister beforehand, and a Masters Confidential Report completed by the captain must be returned to DAFM within eight days of the completed journey. There is an anomaly in the reports in that livestock vessels Sarah M and the Shorthorn Express rarely log any sickness or injury whereas the Finola M usually lists substantive ailments. It would look at first sight that either the captains of the Sarah M and Shorthorn Express are not completing the report correctly or there is something wrong with the Finola M causing all the illness and injury. In December 2020 a vet accompanied a shipment to Libya in the Sarah M, but disembarked at Algeciras. In his report he referenced a sick pen where animals were treated well. However, the Master's report did not log any illness or injury at all. So what was the vet referring to? It would appear these documents are not being completed correctly with no action being taken by DAFM to address the issue. See Annex 8.

Appalling animal welfare standards in the importing countries

The biggest area of concern for us by far is the fact the countries the bulls are exported to are known to have appalling animal welfare standards, particularly at slaughter, and there are no regulations in place. World Animal Protection, a global organisation with 14 offices all over the world that has been operating for 55 years, has ranked many of these countries from A to G with G being the lowest. Factors are considered including legislation in place, enforcement, standard practices, alignment with OIE standards etc. These are the rankings for countries Ireland exports cattle to that have been ranked:

Algeria: G – OIE's standards and principles are not incorporated within government policy and legislation

Egypt: G – OIE animal welfare standards have yet to be transposed into legislation and policy

Morocco: G – existing legislation does not incorporate any of the OIE's guiding principles for animal welfare.

Turkey: E – there are significant gaps in legislation in comparison with the OIE's principles and standards on animal welfare.

Libya, Jordan and Lebanon have not been ranked.

Compassion in World Farming, Eyes on Animals and Animals International have footage obtained through investigations of inhumane slaughter in Turkey, Algeria, Morocco, Lebanon, Jordan and Egypt – all countries that Ireland exports cattle to. The only country that NGOs have not been able to access is Libya because it is too dangerous to conduct an investigation there, as it is a war torn country with no effective government in place. However, the slaughter conditions in Libya are unlikely to be significantly different from those in nearby Egypt where film evidence shows slaughter to be particularly brutal and inhumane.

In September 2016 Animals International were in Turkey when livestock vessel Atlantic M arrived from Ireland, full of bulls. They were completely caked in faeces and were crammed into open trucks in the soaring heat, to continue the journey. According to the Irish Times a DAFM vet monitored the unloading and reported the cattle were well rested and in good condition. However, 11 bulls had been sick or were injured during the sea journey and 8 had died.



Irish cattle in Turkish truck after 14 day sea journey 2016

Record of Animal Illness / injury: Species: _____ (use separate sheet for different species)

Deck No.	Total no. animals loaded	Number injured during voyage	Number ill/ injured during voyage	Number ill/ injured during discharge	Total Number ill / injured	Reasons *
1	626	Nil	1	Nil	1	Not eating / No appetite to eat / Responding to treatment
2	711	3	Nil	Nil	3	Swollen leg
3	899	3	Nil	Nil	3	Swollen leg /
4	1157	Nil	2	Nil	2	Respiratory
5	668	Nil	2	Nil	2	Respiratory

Masters Confidential Report Turkey Shipment 2016

Record of Animal Mortalities

Deck No.	Total no. animals loaded	Mortalities during loading	Mortalities during voyage	Mortalities during discharge	Total Mortalities	Reasons*
1	626	Nil	2	Nil	2	Not responding to treatment
2	711	Nil	2	Nil	2	Not responding to treatment
3	899	Nil	2	Nil	2	Unknown caused
4	1157	Nil	1	1	2	Not responding to treatment
5	668	Nil	Nil	Nil	0	Unable to stand up EUTHANISE

Inhumane slaughter standards in the importing countries

In October 2020 investigations by Animals International uncovered evidence of Irish cattle in a slaughterhouse in Lebanon where the slaughter methods used are brutal, causing immense fear, pain and suffering to the animals. The cattle are forced onto their backs and secured by ropes tied to a hind leg and foreleg; another rope is placed around the mouth and the head is pulled up by one man whilst another slits the animal's throat, all whilst fully conscious. Death is not instantaneous. It is clear that the slaughtermen are afraid of the cattle and the facilities at the slaughterhouse are wholly inadequate. You were sent this footage, Minister, on 27th January 2021 but the response we received did not address the issue, and instead stated that 'it is important to note that the export of animals is a private commercial activity that provides an alternative market outlet for farmers.'

The footage can be viewed here: <https://vimeo.com/504452675>

Screenshots from the footage showing Irish ear tag



In July 2022 Animals International again came across evidence of Irish cattle when conducting an investigation in Jordan. At the slaughterhouse not only were animals killed in front of each other, one sheep was actually placed on top of a dead one while a worker stabbed him in the neck. In another shot a bull appears to be in a restraint box and he has been stabbed in the neck but is not dead and has fallen from the box. A crowd of men and children watch on as the bull slowly bleeds to death after several minutes. The knife used appears to be blunt. Animals have taken up to 30 minutes to die, a slow and agonizing death.

The footage can be viewed here: <https://vimeo.com/735503977>

Screenshots from the footage showing Irish ear tag



Animals International has also conducted investigations in Egypt and discovered the same standards of slaughter that are even more brutal and inhumane. No evidence of Irish cattle was found as Ireland has only just started shipping cattle there but they will be subjected to the same treatment in slaughter houses and in the open street. Of all the footage viewed this is the most horrific: cattle are stabbed repeatedly in the eyes and neck, pulled by hooks in their noses and their tendons are slashed to prevent the animals escaping.

The footage can be viewed here: <https://vimeo.com/761007428>

Screenshot from the footage



If these methods of slaughter were carried out in Ireland it would be in direct contravention of Article 3 of Council Regulation (EC) No 1099/2009 on the protection of animals at the time of killing, Part II Sections 13, 14 and 15 of Ireland's Slaughter of Animals Act 1935 and Part 3 Section 12 of Ireland's Animal Health and Welfare Act 2013. Whilst religious slaughter without stunning is permitted in Ireland and the EU, the cruel slaughter methods that are standard in the Middle East and North Africa are not. A DAFM official has claimed that the Department 'makes efforts to ensure the slaughtering of animals abroad is in keeping with Ireland's own regulations'; however, these efforts appear to be unsuccessful and we are yet to be informed about the steps that are taken to ensure the slaughtering of animals abroad is in keeping with Ireland's own regulations. These practices are in direct breach of standards set by the OIE and they are in breach of Islamic rules that state the animals should be handled gently, they should not be slaughtered in front of other animals and there should be no blood seen which would cause stress and discomfort. This slaughter is not halal. Whenever Imams and other Muslims see our footage, they are horrified and stress that slaughter involving such suffering is not halal. The issue is largely one of inadequate experience, education and lack of skills that would take many years to rectify, if any action were taken.

The total cattle export industry in Ireland is worth around 1% of the agri-food export industry and 7% of beef exports. The volume exported outside the EU each year is far less than the amount of cattle sent to slaughter every week in Ireland so will be worth a fraction of that. This industry is not important to the economy or the beef sector and it is clear that the financial benefit of live export to third countries is far outweighed by the pain and suffering inflicted on the animals involved. Where does this fit in with the Animal Welfare Strategy that makes several references to the fact that animals are sentient and deserving of the five freedoms as a minimum?

We call on the Irish authorities to stop the cruel live export of cattle and sheep outside the EU, regardless of whether for slaughter, fattening or breeding. We urge you to replace live export with meat to eliminate all this senseless suffering and keep the animals and the jobs in Ireland. We also ask that you support a full EU ban on export to third countries, excluding Northern Ireland and the UK.

We respectively request a meeting with yourself in order to discuss our concerns in more detail and look forward to hearing from you at your earliest convenience.

Yours sincerely



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Director
Ethical Farming Ireland



Lesley Mottat
Director
Eyes on Animals



Peter Stevenson OBE
Chief Policy Advisor
Compassion in World Farming



Gabriel Paun
EU Director
Animals International

Annex 1



Annex 2

Extract from marine surveyors report for the Shorthorn Express October 2020

The vessel is not considered compliant with the regulations concerning roll periods. It will be necessary to present stability information demonstrating compliance with roll period requirements prior to loading. In the event that roll periods greater than 15 seconds are not demonstrated then restrictions to sailing will apply when weather forecasts predict wind strength to be force 6 or greater on Beaufort scale.

Extract from marine surveyors report for the North Star 1 October 2018

8) Standard of Paint maintenance and general corrosion of steel surfaces in livestock decks to be attended to, with adequate surface preparation and painting to be carried out before the vessel is presented for loading in Ireland. Improved to be continued

9) Corroded and holed plating in cattle ramp side plating to be repaired / renewed. (Ramp deck 2 to deck 1) To continue at deck 4 to deck 3 ramp

Annex 3

Veterinary report Libya shipment January 2022

Finola M Loading at Greenore port 28/01/2022

After consultation and instruction from [REDACTED] VI, I permitted 305 sheep be loaded and transported on this voyage.

I instructed the Captain of the Finola M to set up pens equivalent to 110 square meters for the transport of the sheep. The pens were secured by criss-crossing ropes so the sheep were confined to the designated pens. The drinkers in these pens were lower to the bottom rails to allow access for the sheep

Signed

[REDACTED]

27/06/2022

[REDACTED] VI

Annex 6

Temperature and Humidity, Voyage Journal Jordan March 2022

Total Accuracy	Environment in decks (D)								Wind		Course of vessel	Rei
	Temperature				Humidity				Speed	Direction		
	D1	D2	D3	D4	D1	D2	D3	D4				
	21	21	21	22	78	79	70	68				
	19	19	19	20	78	79	80	78				
	22	21	22	19	75	72	72	72				
	21	21	21	20	73	72	70	73				
	24	24	24	22	75	76	76	75				
	25	24	22	23	75	74	73	75				
	24	24	24	22	75	73	75	74				
	24	23	23	21	76	75	72	70				
	24	23	24	23	75	76	77	75				
	25	25	25	24	72	73	72	73				
	25	26	26	25	74	74	75	76				
	25	25	25	25	76	75	76	76				
	26	26	25	25	79	78	76	77				
	28	28	28	30	75	76	72	71				
	29	29	30	28	77	76	78	77				

Temperature and Humidity, Voyage Journal Egypt August 2022

Voyage Journal

ty	Environment in decks (D)								Wind		Course of vessel	Remarks
	Temperature				Humidity				Speed	Direction		
	D1	D2	D3	D4	D1	D2	D3	D4				
	24	23	24	24	78	79	82	82	12	S	192	
	24	25	24	25	83	83	82	83	18	N/E	198	
	24	24	25	24	80	81	80	80	26	N/E	180	
	26	26	25	24	88	88	88	88	8	N/E	167	
	27	27	27	27	88	86	87	87	5	N/E	086	
	29	29	29	28	86	86	86	87	18	N/E	081	
	27	27	27	27	87	87	87	88	8	N/E	081	
	28	28	31	31	87	88	88	89	8	E	091	
	29	29	31	32	86	86	85	86	9	S/W	101	
	31	31	32	32	86	86	87	87	9	SW	104	
	30	30	31	32	84	84	85	85	12	N/W	127	
	32	32	32	33	85	86	87	86	8	NW	127	
	Discharging IN PORT.								20	N	PORT.	

Annex 7

Extract from veterinary report Jordan shipment May 2022

200 Tonnes of concentrates was, in my opinion, too much to load for this voyage. It would have been better if less concentrates and more hay and sawdust were loaded.

Over the whole voyage there was 24 lame cattle, due primarily to the decks being too slippery from excessive soft dung.

One animal with a badly injured hock who showed no signs of responding to treatment was euthanased.

On the 12/05/2022 one lame bull who had been moved into the hospital pen was inexplicably found dead. This animal had been eating when last observed.

Record of Animal illness / injury: Species: BOVINE (use separate sheet for different species)

Deck No.	Total no. animals loaded	Number injured during voyage	Number ill/ injured during voyage	Number ill/ injured during discharge	Total Number ill / injured	Reasons *
1	299	1	1	NONE	2	LEG INJURY JOINTS RESPIRATORY
2	345	1	2	NONE	3	LEG INJURY JOINTS RESPIRATORY
3	552	4	4	NONE	8	LEG INJURY JOINTS RESPIRATORY
4	590	5	6	NONE	11	LEG INJURY JOINTS RESPIRATORY
5						
6						

Extract from veterinary report Egypt August 2022

Record of Animal illness / injury: Species: Bovine (use separate sheet for different species)

Deck No.	Total no. animals loaded	Number injured during voyage	Number ill/ injured during voyage	Number ill/ injured during discharge	Total Number ill / injured	Reasons *
1	301	0	2	0	2	Respiratory issues
2	333	1	2	0	3	1 leg injury Respiratory
3	645	3	3	0	6	3 leg joint swell, 3 Respiratory
4	599	2	1	0	3	2 leg joint swell, 1 Respiratory
5						

- The vessel performed well, however the ventilation system needed to be rearranged to ensure effective ventilation due to external temperatures in the second half of the journey. Due to generators max output, there were technical limitations.
- Adequate amounts of fodder, concentrates and hay, and bedding were provided for. Surplus hay had to be disposed at sea, surplus concentrates (12.5 tonnes), couldn't be left with receivers.
- Grip on decks was satisfactory with the additional use of saw dust, however decks may need to be further treated to make them non-slip.

Annex 8

Extract from veterinary report Sarah M December 2020

25/12/2020 and 27/12/2020 The routine was very much the same as for previous days with any sick animals, of which there were few, being moved into hospital pens and receiving treatment. V.I. also went in the evenings to check the animals.

Extract from Masters Confidential Report Sarah M December 2020

Record of Animal Illness / Injury: Species: Bovine (use separate sheet for different species)

Deck No.	Total no. animals loaded	Number injured during voyage	Number ill/ injured during voyage	Number ill/ injured during discharge	Total Number ill / injured	Reasons *
1	135	NIL	NIL	NIL	NIL	NIL
2	250	NIL	NIL	NIL	NIL	NIL
3	345	NIL	NIL	NIL	NIL	NIL
4	240	NIL	NIL	NIL	NIL	NIL
5	260	NIL	NIL	NIL	NIL	NIL
6	NIL	NIL	NIL	NIL	NIL	NIL