



Eyes on  
Animals

Dear

Wednesday 23 July

- Jean-Marc Roué, Chairman Brittany Ferries
- Christophe Mathieu CEO Brittany Ferries
- Rodolphe Saadé Chairman & CEO of the CMA CGM Group

### **Brittany Ferries resumption of inhumane live exports from Ireland to France**

In reference to our letter of 20<sup>th</sup> March 2025, sent over 4 months ago on behalf of over 120 signatories, we are yet to receive a response.

This is particularly concerning, as since our letter a new EU Commission report<sup>1</sup> has been published that acknowledges that the journeys you are facilitating are a welfare failure stating, “for journeys involving long ferry legs, calves are not fed at the required intervals”.

We are aware that, so far, over 100,000 emails have been sent to Brittany Ferries from concerned EU and UK citizens and these individuals have received a response. However, these responses indicate that Brittany Ferries may not be fully informed on what these journeys mean for unweaned calves. Below, we address some of the most concerning points in your responses and clarify exactly what these calves have to endure during the journey from Ireland to France.

**[1]** You claim that animal welfare is of great importance to you and that measures are in place to safeguard the wellbeing of the animals throughout the journey. You also claim that you are committed to adhering to all relevant regulations, including EC Regulation 1/2005 on the protection of animals during transport.

Unweaned calves do not have fully developed immune systems and have little body fat in reserve to keep them going during the journey. They are fully dependent on milk or milk replacer and cannot be fed whilst in a crowded truck. This makes them extremely vulnerable and susceptible to illness and disease.

The calves are loaded for export at around midday (two hours after feeding); it can take four hours to get to Rosslare port and the trucks arrive 2 – 4 hours before the ferry departure time. The sea crossing takes 18 hours during which the calves cannot be fed as they are in a truck. It then takes around an hour to disembark the ferry and get to the control post in Cherbourg. As 2,500 calves can arrive at the same time it takes many hours to get them all fed. Investigations have shown that calves that endure the journey you are facilitating are deprived of feed for

around 30 hours, sometimes longer. After a 13-hour stay at the control post the calves are loaded up and continue their journeys to Spain, the Netherlands or perhaps as far as Poland.

As indicated in our previous letter, the Commission's interpretation of the legislation is that unweaned calves must be fed after a maximum of 19 hours transport, even if that 19-hour point is reached during the sea crossing from Ireland to France. The Commission conducted an audit in June 2022 on the export of unweaned calves from Ireland and the subsequent report published in December 2023<sup>2</sup> clearly states on four separate occasions that these journeys are not in line with legislation. It is therefore questionable how you can claim that you have met all requirements, as the calves are not being fed during the RORO crossing.

**[2]** In your responses you state that you work closely with the relevant authorities to ensure full compliance with all legal and welfare obligations. However, perhaps you are unaware that Ethical Farming Ireland has launched legal proceedings against the Irish authorities due to feeding requirements not being met, subjecting calves to unnecessary harm and suffering. The case is ongoing.

There have also been several complaints and petitions to the Commissioner following their audit, including requests to initiate infringement proceedings against the Irish State and to take action to compel the Irish authorities not to authorise these journeys.

**[3]** Another rather worrying response is your statement that your role is to transport the lorries, while the drivers remain responsible for their cargo—in this case, the unweaned calves. You claim that artificial teats are used to administer water, and hay is available to the calves throughout the voyage. You add that drivers may access their lorries upon request and routinely check on the animals during the crossing.

Firstly, we have not seen any evidence that hay is provided, however, unweaned calves cannot digest it anyway, they do not have a developed rumen. They need milk or milk replacer. Drivers may check on the calves during the journey, but they do not give them milk, so this is of little benefit regarding feeding them. Furthermore, artificial teats are only used for export to the Netherlands and the water systems are switched off for most of the journey because the drivers don't want the bedding to get too wet.

Secondly, it is not the case that your role is merely to transport the lorries and that the drivers are responsible for their cargo. Article 2(x) of EC Regulation 1/2005 defines a transporter as: "any natural or legal person transporting animals on his own account, or for the account of a third party". In our view Brittany Ferries clearly fits into this definition. Further to this, Brittany Ferries has been certified by the Irish authorities as a Type 2 Transporter under EC Regulation 1/2005.

Article 6 of the same regulation goes on to state that "Transporters shall transport animals in accordance with the technical rules set out in Annex I." Annex I includes the rules on feeding intervals for unweaned animals. Therefore, we believe that Brittany Ferries is legally required to ensure that these rules are complied with, i.e. that the calves are fed after the 19-hour interval, which occurs at some point during the crossing from Ireland to France.

There have been two studies recently commissioned by Teagasc, the Irish farming advisory group.<sup>3</sup> The results indicate that unweaned calves are negatively impacted by the long periods of food deprivation. Calves experience energy depletion, hypoglycaemia, and dehydration.

A study has recently been published of a trial involving a truck with an onboard feeding system<sup>4</sup>, which took place in October 2023, and the trial was unsuccessful. The authors of the study themselves confirmed that the on-board feeding system was not viable:

The practical use of the on-board feeding system was difficult, perhaps even impossible in its current form within the context of transport by sea and the variability of real-life sea conditions. Uncertainty surrounded individual milk replacer intake, as highlighted by the removal of 20 FEED calves (1 pen) and two calves refusing to drink despite the trial team's efforts. Labour intensity was high, yet 22% of FEED calves still had glucose concentrations below the lower reference value, indicating insufficient intake. In commercial settings, monitoring of feeding is unlikely, and a 2 L volume may not be sufficient for all calves to maintain their energy balance, especially when competing between teats.

It cannot be denied that calves suffer from prolonged feed deprivation, and we again urge Brittany Ferries to respond to us on our concerns and take the steps to introduce a policy to **end live exports for farmed animals for fattening and slaughter on your ferries.**

Yours sincerely

Compassion in World Farming

Eurogroup for Animals

Compassion in World Farming France

Ethical Farming Ireland

Eyes on Animals

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#### Footnotes:

1. Report: Overview report on transport of unweaned calves during long journeys

<https://ec.europa.eu/food/audits-analysis/overview/details/160>

2. Report: To evaluate the protection of unweaned calves during long journeys

<https://ec.europa.eu/food/audits-analysis/audit-report/details/4700>

3. Paper: Effects of pre- and post-transport feeding protocols

<https://www.sciencedirect.com/science/article/pii/S0022030225003777>

4. Paper: Feeding on the move

[Feeding on the move: assessing the effect of feeding during long-distance ferry transport on the physiology, clinical signs of disease and activity of unweaned calves - ScienceDirect](#)