

Irish Continental Group,

P.O Box 19
Alexandra Road
Dublin 1
Eircode D01 W2F5

For the attention of:

Eamonn Rothwell, Chief Executive Officer

Andrew Sheen, Managing Director of Ferries Division

Monday 28 September 2026

Subject: Formal notice (mise en demeure) to cease the transport of unweaned calves from Ireland to France – Breaches of European Union and French law

Dear Sirs,

We act as legal counsels to Compassion in World Farming France ("**CIWF France**"), WELFARM and QUATRE PATTES (FOUR PAWS France), in connection with the sea transport of unweaned calves carried out by your company between Ireland and France for many years.

We have serious grounds for believing that the conditions under which unweaned calves are transported **do not comply with European and French legal requirements**, which are mandatory for all transport of live animals, and in particular for highly vulnerable animals such as unweaned calves.

1 – Under European Union law, Regulation 1/2005 applies to the transport of live vertebrate animals carried out in connection with an economic activity, from the moment the animals are loaded until they are unloaded, including during transfer and rest periods (*Regulation 1/2005, Articles 1 and 2*).

To begin with, reference should be made to Article 3, which provides that: "*No person shall transport animals or cause animals to be transported in a way likely to cause injury or undue suffering to them*".

With regard to the transport of unweaned calves by ship, the rules are as follows:¹

- **With regard to journey times:**

- In principle, the journey time for transport by sea is limited to 8 hours (*Point 1.2*);
- This period may be extended provided that the provisions relating to watering and feeding intervals are complied with (*Points 1.2, 1.3, 1.4(a) and 1.7(a)*).

- **With regard to the rules on watering and feeding unweaned calves (*Point 1.4*):**

- Unweaned calves **must** be watered **after 9 hours** of journey time and, "*if necessary*", fed (*Point 1.4 a*)).

¹ Annex I, Chapter V, Points 1.2, 1.3, 1.4 (a), 1.5, 1.7, Regulation 1/2005.

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

Furthermore, The European Commission interprets this as meaning that the requirements on journey times and rest periods do not apply during a sea journey **but that the requirements on feed and water continue to apply**. This interpretation is set out in a letter dated 15 June 2020 from the European Commission to the organisation Eyes on Animals and in its audit report dated 22 December 2023 (DG(SANTE) 2022-7503).

Thus, unweaned calves must be given water and, if necessary, fed, **every nine hours of travel**. Moreover, the European Commission’s interpretation of the provisions of Chapter V of Annex I to Regulation 1/2005 in its audit report dated 22 December 2023 is that, after 19 hours of transport, the animals must be watered and fed. The requirement to feed unweaned calves after 19 hours of transport is not qualified by “if necessary”.

In this regard, the Court of Justice of the European Union has clarified that the concept of ‘travel’ must be interpreted as including the time required for loading and unloading the animals.²

- The European Commission provided further details in its 2016 Good Practices Guide on the Transport of Young Calves, in which suitable feeding for young calves is defined as **2 litres of milk every 12 hours, with a 1-hour rest period before the journey resumes**.³

Similarly, the most recent scientific evidence from EFSA recommends a maximum feeding interval for calves of **12 hours**.⁴

These requirements are also enshrined in French law, in the Rural Code, which expressly sanctions non-compliance with the rules set out in Regulation 1/2005 (see, in particular, Articles R. 215-6, R. 214-52, R. 214-53, R. 214-55 and R. 214-56 of the Rural Code).

Furthermore, Article L. 215-11 of the Rural Code provides for criminal sanctions in cases of animal mistreatment, and the Egalim Law of 30 October 2018, article 67, extended its scope to transporters of live animals.

2 – In the audit report dated 22 December 2023 (DG(SANTE) 2022-7503), the European Commission stressed that, in its view, the transport of unweaned calves from Ireland to France is being carried out in breach of Regulation 1/2005 on the protection of animals during transport:

“the fact that calves are not given liquid feed on the roll-on roll-off vessel is contrary to the legal requirements of feeding intervals laid down in Chapter V, Annex I to the Regulation, in particular Point 1.4(a).”⁵

In an overview report on the transport of unweaned calves published in May 2025 (DG(SANTE) 2023-7925) the Commission also states:

“Transport by ferry presents additional challenges, particularly due to prolonged fasting periods. For journeys involving long ferry legs, calves are not fed at the required intervals.”⁶

² CJCE, arrêt du 23 novembre 2006 (question préjudicielle), Hauptzollamt Hamburg-Jonas c/ ZVK Zuchtvieh-Kontor GmbH, aff. C-300/05, point 21.

³ European Commission, Good Practices Guide, Transport of Calves, 2016, page 2

⁴ EFSA’s Scientific Opinion, Welfare of cattle during transport, September 7th, 2022

⁵ European Commission, Final report of an audit of Ireland carried out from 7 to 17 June 2022 in order to evaluate the protection of unweaned calves during long journeys, DG(SANTE) 2022-7503, paragraph 47.

⁶ European Commission, Executive Summary of DG(SANTE) 2023-7925

It seems clear that Irish Ferries does not comply with the regulations for transporting unweaned calves between Ireland and France:

- the average journey time for the transport of unweaned calves between Ireland and France is 22 to 24 hours, according to the European Commission⁷, including the time from loading onto the road vehicle to travel to the Irish port, the crossing time from Ireland to Cherbourg and the driving time to the control post near Cherbourg;
- during the journey, the configuration of the road vehicles in which the calves are transported does not allow milk replacer to be distributed, with the result that the calves can only be fed if they are unloaded from the truck. It is not possible to unload the calves from the truck while it is on a RORO ferry;
- the calves are not fed until they arrive at the Cherbourg control posts, even though the average total journey time is 22-24 hours.

Especially as scientific research on the transport of unweaned calves from Ireland to France shows that these journeys can detrimentally impact the biological functioning of unweaned calves, for example resulting in a negative energy balance, increased dehydration, muscle fatigue, lowered glucose levels and metabolic stress.⁸

3 – Following the campaign by our client organisations raising concerns that transport conditions were not in compliance with the regulations, Brittany Ferries have ceased transporting unweaned calves between Ireland and France.

As of today, your company is still operating under the same conditions, which may constitute a breach of both European regulations and French law.

Accordingly, we hereby **formally give you notice**, within **fifteen (15) days** of receipt of this letter:

1. **to cease the transport of unweaned calves from Ireland to the port of Cherbourg**, or, in the alternative, to suspend those operations until such time as their compliance with Regulation 1/2005 is established;
2. to confirm to us in writing your position and the measures adopted;
3. to communicate to us the following documents:
 - the transporter authorisation issued pursuant to Articles 6 and 11 of Regulation 1/2005 ;
 - the roll-on roll-off vessel approval issued in respect of the ferries currently being used by Irish Ferries for the transport of unweaned calves pursuant to Ireland's Diseases of Animals (Animal Transport) (Roll-on Roll-off Vessels) Order 2007;
 - the certificates of competence of the attendants assigned to those journeys;
 - a detailed description of the arrangements made on board to water and feed unweaned calves after nine and nineteen hours of travel.

⁷ European Commission, Final report of an audit of Ireland carried out from 7 to 17 June 2022 in order to evaluate the protection of unweaned calves during long journeys, DG(SANTE) 2022-7503, page 17.

⁸ Van Dijk et al, 2025. 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 <https://www.sciencedirect.com/science/article/pii/S1751731125001442> and Siegmann et al, 2025. Effects of pre- and post-transport feeding protocols on the metabolism and physiological status of veal calves. Journal of Dairy Science, Volume 108, Issue8, August 2025 [Effects of pre- and post-transport feeding protocols on the metabolism and physiological status of veal calves](#)

If we do not hear from you within the specified time frame, our client reserves the right to pursue all available legal remedies in order to put an end to these practices.

Please forward this formal notice to your regular legal counsel so that they may contact us.

We would like to thank you in advance for your attention to this matter and remain at your disposal should you require any further information.

Yours faithfully,

François de Cambiaire

A handwritten signature in blue ink, consisting of a large, stylized 'F' and 'C'.

Camilla Michel

A handwritten signature in blue ink, featuring a large, stylized 'C' and 'M'.

Clémentine Baldon

A handwritten signature in blue ink, consisting of a large, stylized 'C' and 'B'.