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Zac Goldsmith MP  
Minister of State  
Department for Environment, Food and Rural Affairs  
Seacole Building, 2 Marsham Street  
London SW1P 4DF

Mairi Gougeon MSP  
Minister for Rural Affairs and the Natural Environment  
The Scottish Government  
St. Andrew's House, Regent Road  
Edinburgh EH1 3DG

Dear Mr Goldsmith, Dear Ms Gougeon

### **Export of live calves**

Compassion in World Farming and Eyes on Animals believe that:

- APHA is not taking proper steps to ensure that unweaned calves exported from Britain receive liquid and feed as required by Council Regulation 1/2005, and
- the transport of calves on export journeys over 8 hours is in breach of Regulation 1/2005.

Regulation 1/2005 provides that after 9 hours travel, unweaned calves must "be given a rest period of at least one hour sufficient in particular for them to be given liquid and if necessary fed".

### **No checks seem to be carried out to verify if calves are being given liquid and, if necessary, fed during the one hour rest break**

Article 15.1 of 1/2005 provides "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 1".

Referring to Article 15.1, Eyes on Animals asked APHA how often they carry out random checks on long journeys involving the export of unweaned calves to ensure they are offered water and if necessary fed, during the one hour rest period.

APHA's response (ref: Q136) was "Regarding inspections under Article 15, APHA audit all returned journey logs for consignments of calves that have travelled on the Joline. Section 4 of the journey log is completed by the driver and indicates that animals have been rested for the required period of time as set out in the legislation and been offered water and/or feed. APHA have not identified any non-compliance with this requirement during audit checks of journey logs.

APHA inspectors are specifically advised prior to a supervised loading of calves to confirm that the arrangements are suitable i.e. to check that buckets/teats are available."

From these answers it appears that APHA simply relies on supervised loadings and on driver statements in completed journey logs. Crucially, APHA appears not to have carried out any checks under Article 15.1. to verify that calves are in fact being given liquid and fed during the mandatory one hour rest break. It is insufficient to rely on journey logs completed by the driver; APHA should carry out checks on a proportion of vehicles to verify that calves are being given liquid and fed during the mandatory one hour rest stop.

Since unweaned calf exports resumed from Ramsgate, it has been witnessed on numerous occasions by Eyes on Animals representatives and others, that no driver has tended to the calves during either driver rest breaks or rest periods en-route to Ramsgate.

**Are calves able to access water during the mandatory one hour rest period?**

APHA states: "As previously advised, the **feeding of milk supplement on a vehicle is not practical** and at supervised loadings our Inspectors ensure that there is access to water within each pen and that the means of watering is suitable for the species being transported. Where the animals are un-weaned calves there will be a bucket with a flexible teat in each pen which can be replenished with water and if necessary electrolytes during the one hour rest period."

It is one thing to have buckets onboard the trucks but unless they are presented to the calves during rest breaks, they have no opportunity to drink from them. Moreover, the buckets must be filled manually because they are not connected to the internal water system onboard the truck. We query if it is physically possible for one driver to tend to so many animals (average 250 calves) in the given time? It is well known that calves will push their way to the liquid/feed, making it impossible for a driver to ensure all animals get the opportunity to drink. A dominant animal will take and not share with the others. It must be noted that the driver does not enter the truck to tend to the animals, they can only be accessed by small doors and a ladder must be deployed to tend to animals on the second and third tiers.

**Journeys of unweaned calves over 8 hours should not be authorised by APHA**

Paragraph 1.2 of Chapter V of Annex I to Regulation 1/2005 provides that journey times "shall not exceed eight hours". Then, as a derogation, longer journey times are permitted provided that certain conditions are met. One such condition is set out in Paragraph 1.4 of Chapter V. This provides that "unweaned calves which are still on a milk diet 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".

Calves are left on the vehicle for the one hour break. As indicated above, it is very difficult to provide water to all the calves on board a truck during the one hour break. Moreover, calves do not just need to be given liquid during the one hour break, they also need to be fed i.e. provided with nutrition. For young calves nutrition takes the form of milk replacer. However, as indicated above, APHA recognises that it is not possible to provide milk replacer on a vehicle.

It is widely recognised that young calves need to be fed twice a day. On farm, dairy calves aged 2-5 weeks (the age range of most exported calves) are typically fed twice per day with an interval of 12 hours. In its natural environment a calf would suckle from its mother on average every 5-6 hours.

The need for twice daily feeding is recognised by the law. Paragraph 12 of Schedule 6 to the Welfare of Farmed Animals (England) Regulations 2007 provides that "all calves must be fed at least twice a day". An identical provision is included in Scotland's Regulations. *Red Tractor* states that calves must be "provided with at least two milk feeds a day until 28 days". It may be that calves' need for feed is higher during transport than on farm, due to the energy demands from being on a moving truck.

Calves should be fed before transport but should then be allowed to rest for 3 hours before being loaded as, after drinking, proper digestion of the milk takes 3 hours. During this period, calves must have enough space to lie down. If this is not provided, they may develop diarrhoea. This means that by the time calves reach the mandatory one hour break, they will have been without feed for 12 hours (3 hours post-feed rest plus 9 hours travel) and so must be fed – as well as given water - during the one hour break. However, as recognised by APHA, it is not possible to feed calves on the truck.

Accordingly, APHA should not authorise the transport of calves for over 8 hours as it is not possible to fulfil the requirements regarding feed and liquid that are a condition precedent for

permitting journeys over 8 hours to take place. When these conditions cannot be met, journeys must under Paragraph 1.2 of Chapter V of Annex I to Regulation 1/2005 be limited to 8 hours.

We would add that we believe that Bavaria has recently announced it will no longer approve unweaned calf export journeys over 8 hours as they have determined it is not possible to ensure that all calves are watered and fed during the one hour rest period.

Yours sincerely

A handwritten signature in blue ink that reads "Peter Stevenson". The signature is written in a cursive, slightly slanted style.

Peter Stevenson  
Chief Policy Advisor  
Compassion in World Farming

A handwritten signature in blue ink that reads "Nicola Glen". The signature is written in a cursive, slightly slanted style.

Nicola Glen  
UK & Ireland Inspector  
Eyes on Animals