

# Submission Guide

## - Ireland's Animal Welfare Strategy

This guide will support those who care for farm animal welfare issues to make a submission to Ireland's [consultation on the Animal Welfare Strategy 2026-30](#).

### Overview of the Consultation

- The Department of Agriculture, Food and the Marine is seeking input from the public on Ireland's next Animal Welfare Strategy for 2026–2030.
- The consultation aims to identify the main challenges in animal welfare and gather suggestions for improvements across all types of animals.
- Feedback will help shape the new Strategy, which will guide future policies, education, and enforcement to improve animal welfare nationwide.

### Steps

1. [Review the consultation webpage](#).
2. **Formulate your submission in a Word Document or Email. If using this Guide:**
  - Structure your submission however you like (no right answer!) You can definitely keep it simple, just briefly introduce yourself, make a couple arguments and submit.
  - Include in your response any relevant **qualifications, experience or reasons why you care for the issue** - connect to personal/professional experiences where possible. Mention where **you are/were from in Ireland**.
  - For the argumentation below, at your discretion, **pick 2-3 Sections** and **1-2 Arguments from each** to use as the basis for your own submission. **Do NOT simply use the provided text as is.** Instead:
    - i. Personalise the arguments and your submission. Rewrite the arguments into your own words, making suitable amendments to suit your views and style, or

- ii. Use the expert evidence provided to formulate your own response, or
  - iii. Rewrite the text using an LLM (e.g. [ChatGPT](#), [Gemini](#) or [Claude](#)) to do so. If you use an LLM, ensure to carefully review the outputs and ensure they reflect your views and understanding. Example prompt to use:
    - 1. *“I am making a submission to this consultation (<https://www.gov.ie/en/department-of-agriculture-food-and-the-marine/consultations/animal-welfare-strategy-2026-2030/>), please rewrite this argument (\_\_\_\_) in my personal, professional style.”*
- For those who can **submit on behalf of an organisation**, do so! Otherwise **submit as an individual**, as that is still greatly valuable!
3. **Email your submission to:** [animalwelfareconsultation@agriculture.gov.ie](mailto:animalwelfareconsultation@agriculture.gov.ie)
4. **Fill in the Response Form:** <https://forms.gle/sXA12RbSLSXsWE1a6>

## Argumentation

*There is a lot of information below. You DON'T have to read through it all. Rather just pick 2-3 Sections to focus on and use 1-2 Arguments for each.*

Argument Sections:

- S1. Cattle Export
- S2. Pig Welfare
- S3. Poultry Welfare
- S4. Sheep Welfare
- S5. Marine Welfare
- S6. Additional Arguments

### S1. Cattle Export

The Irish government should phase-out live-exports by sea, raise the export age for calves and ensure pregnant cattle are not exported.

Argument	Text

<b>Live export outside the EU causes significant suffering</b>	<p>A core animal welfare issue Ireland needs to address concerns issues around the live export of cattle via sea journeys to countries outside the EU. Every year Ireland exports in excess of 20,000 bovines to countries outside the EU, some animals have been as young as five or six months old. The sea journeys can take 5 – 16 days where animals often become sick and injured along the way. Respiratory illness is the main cause of death due to high humidity and ammonia fumes in the vessel and along the export journey many animals end up knee deep in their own excrement.</p> <p>In the third countries in which Irish cows are exported towards, legislation is minimal and unenforced, with inhumane methods of slaughter including slashing leg tendons, stabbing the eyes, and being shackled and hung up by a rear leg. Destinations include: Turkey, Libya, Lebanon, Morocco, Tunisia, Kazakhstan, and</p>
<b>Raise the export age for calves</b>	<p>Calves are currently exported as young as 15 days old, the majority are 15-28 days. <b>Calves should only be transported at 8 weeks old at an absolute minimum.</b> The core issue is that it is not possible to feed unweaned calves during transit. Previous trials of a truck with a feeding system failed fundamentally.</p> <p>It is not possible to feed 300 unweaned calves milk in a truck, attempting to implement such a solution is not feasible. The only solution is to raise the export age for calves when the immune and rumen systems are developed and they can start being weaned off milk. The age should be raised to 12 weeks, or 8 weeks at an absolute minimum.</p> <p>The export of unweaned calves is being conducted illegally because the calves are not being fed within the required timeframe. An <a href="#">audit by the EU Commission in 2022</a> confirmed these journeys are not in line with legislation. After 9 hours of transport calves must be given water and one hour rest and fed if necessary. They can then be transported for a further 9 hours after which they must be fed. The issue is export involves an 18 hour ferry journey during which the calves can't be fed. There are 300 in each truck over three tiers and have to be unloaded to be fed.</p>
<b>Pregnant cattle</b>	<p>Pregnant cattle in late gestation should not be exported outside the EU as their welfare cannot be guaranteed. They shouldn't be more than 60% into the pregnancy whereas currently it can happen up to 90%. There have been <a href="#">three</a></p>
Economic Argument	<p>Live export outside the EU could be stopped without impacting the beef industry and factory prices.</p> <p>The Irish beef export industry is over 8x larger than the live cattle export industry. The live export industry for cattle in Ireland in 2024 <a href="#">was €255 million (almost 50% from Northern Ireland), whereas the Irish beef export industry was €2.8 billion</a>. Making the live cattle export industry in Ireland worth around 1% of the agri-food export industry and 7% of beef exports.</p>

<b>Addition al Evidence to Referenc e</b>	<p>Feel free to reference one of the below videos or articles in your submission:</p> <ul style="list-style-type: none"> <li>• <a href="https://api.worldanimalprotection.org/country/algeria">https://api.worldanimalprotection.org/country/algeria</a></li> <li>• <a href="https://www.theguardian.com/environment/2020/feb/17/ireland-revokes-license-of-livestock-ship-operator-over-low-performance-rating">https://www.theguardian.com/environment/2020/feb/17/ireland-revokes-license-of-livestock-ship-operator-over-low-performance-rating</a></li> <li>• (WARNING GRAPHIC) <a href="#">Video on cattle slaughter in third countries</a></li> <li>• <a href="#">Effect of live export journey for calves</a></li> <li>• <a href="#">Study on effects of varying transport durations for calves</a></li> <li>• <a href="#">Effect on calves of feeding during live export by sea</a></li> </ul>
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## S2. Pig Welfare

The Irish Government should push for more space, phase out sow stalls, free-farrowing crates, no routine tail docking/teeth rasping.

<b>Improve pigs environ mental conditio ns</b>	<p><a href="#">Most pigs in Ireland are kept in industrial intensive conditions</a>; they are kept indoors all year round, at the highest legally allowed stocking densities and with minimal or no environmental stimuli. Buildings often have suboptimal ventilation systems with resulting risk of heat/cold stress and high levels of ammonia predisposing to respiratory disease.</p> <p>These conditions restrict pigs ability to display normal behaviours, leading to abnormal, repetitive behaviours such as bar-biting - indicative of mental distress. Overcrowding can also lead to increased levels of disease, aggression, significantly poor hygiene with pigs lying in their own waste and increased levels of tail, ear and flank biting.</p>
<b>Work to resolve issues around tail docking</b>	<p>Almost all pigs in Ireland are reared in intensive conditions in breach of the EC Pig Directive 2008/120 as they are not provided with adequate enrichment and tails are routinely docked. 99% of pigs in Ireland have docked tails. Tail biting is an issue but the cause is not addressed – poor environment and overcrowding. Pigs have an innate need to root and forage which they can't do in a crowded pen with bare slatted flooring so they turn on each other.</p>
<b>Phase out sow stalls &amp; farrowin g crates</b>	<p>A sow can be placed in a sow stall for 2.2 litters a year, spending around 5 months a year in a cage. The European Food Safety Authority recommends farrowing pens rather than crates but a reasonable degree of space and straw bedding is needed. Fully slatted hard flooring which contributes to lameness should be replaced with straw bedding and proper enrichment like hay with slatted flooring systems.</p>

<b>Phase out CO2 stunning /killing</b>	<p>Almost all pigs are slaughtered using CO2 gas which burns when it makes contact with moisture – so the nose, eyes and throat. The pigs panic and try to escape meaning they die in terror and pain. The use of CO2 at high concentrations is unacceptable for the stunning of pigs as it is highly aversive for the animals, causing acute pain and severe distress from first exposure to the gas to loss of consciousness. The stunning of pigs with high concentrations of CO2 should be phased out as quickly as possible.</p> <p>3.6 million pigs are slaughtered in Ireland every year, that's approximately 10,000 every single day. Currently, there is no commercially available alternative to CO2 at high concentrations for gas stunning of pigs. Research and development resources should be urgently devoted to finding a painless and non-aversive alternative to stunning with high concentrations of CO2.</p> <p>Further investment should be made into methodologies such as:</p>
<b>Introduce 'free-range'</b>	<p>There is no clear set of legal standards that would permit use of the term 'free-range' on pork products. This is badly needed. Audits of standards, including veterinary certification of health and welfare claims, should be introduced.</p>

### S3. Poultry Welfare

The Irish Government should enforce lower stocking densities, enrichment, slower-growing broilers, cage-free layers.

<b>Phase out keeping hens in cages</b>	<p>Around 1.5 million egg laying hens are kept in cages. Caged hens have their movement seriously restricted and cannot carry out natural behaviours, they will never experience natural light or fresh air until they are removed at the end of their laying life for slaughter at around 15 – 18 months old.</p> <p>While furnished cages represent an improvement over conventional battery cages, they still severely restrict movement and fail to provide the welfare standards that well-managed cage-free systems can deliver. The inherent lack of space in furnished cages makes it impossible to meet all behavioral and physical needs of hens, leading several European countries to phase out or ban their use entirely. Evidence points to the need for a ban on keeping hens in cages, rather than transitioning to furnished cages, as even furnished cages severely restrict</p>
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<b>Broiler chickens</b> <i>(Example Argument A)</i>	<p>Over 100 million broiler chickens are slaughtered each year in Ireland (chickens that are bred for their meat.) The vast majority have been reared intensively on factory farms, in crowded sheds, usually without windows or natural light. They do not have access to outdoors and cannot carry out their natural behaviours. They can be slaughtered at just 5 - 6 weeks old.</p> <p><u>Key Welfare Issues:</u></p> <ul style="list-style-type: none"> <li>• <b>Fast Growth:</b> Standard broilers have been selectively bred to grow incredibly fast reaching slaughter weight at around 5 – 6 weeks old. This fast growth leaves the birds vulnerable to painful leg problems and heart disorders as they struggle to support their own weight. Heart disorders can lead to sudden death. Broilers are permanently hungry and can have</li> </ul>
<b>Broiler chickens</b> <i>(Example Argument B)</i>	<p>In Ireland, broiler chickens are kept in large, artificially lit sheds in overcrowded conditions with minimal environmental enrichment and no access to the outdoors or ability to express many natural behaviours.</p> <p>Health problems resulting from these conditions include:</p> <ul style="list-style-type: none"> <li>• Breast, hock and foot lesions due to dermatitis from contact with wet or damp bedding,</li> <li>• Respiratory and cardio-vascular diseases. Lameness and breast muscle myopathies due to the incredibly fast growth rate of modern breeds of chicken. Many of these chickens reach slaughter weight less than 5 weeks after birth.</li> </ul> <p>As a result in my submission I recommend that:</p>
<b>Turkeys</b>	<p>Around 1.5 million turkeys are slaughtered in Ireland each year, the majority for Christmas, and welfare concerns are similar to that associated with broilers – they are largely reared intensively in indoor systems, they have been selectively bred to grow faster, reach heavier weights and have larger breasts which causes major health issues including leg disorders and body system failures. Overcrowding,</p>

## S4. Sheep Welfare

Enforce regulation around the tail-docking of sheep

<b>Tail docking need s anest hesia</b>	<p>Young lambs often have their tails docked to help keep their rear ends clean. This reduces the risk of flystrike, which is a serious welfare issue. However <a href="#">Veterinary Ireland argues</a> that these procedures don't have to be routine. Sheep can be bred to have naturally shorter tails, and – when combined with the appropriate fly and parasite management – this can reduce the need for tail docking considerably. Where tail docking is unavoidable for welfare reasons, it is necessary for pain relief to be provided.</p> <p>Tail-docking of sheep is performed to prevent or reduce the accumulation of faeces on the tail and the fleece of sheep. Sheep with dirty fleeces and tails are more likely to suffer from Flystrike, which can cause severe pain.</p> <p>Current Irish legislation, which came into force in 2014 requires that all cattle and</p>
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## S5. Marine Welfare

<b>Mandate welfare driven standards for aquaculture</b>	<p>Ireland's Animal Welfare Strategy must move beyond general guidelines to enforce higher welfare standards, specifically targeting two critical determinants of fish welfare: <b>stocking density and handling/transport methods</b>.</p> <p><b>Stocking Density:</b> High stocking densities are linked to poor water quality, increased stress, and physical injury. The Strategy must commit to a scientific review of current limits and introduce mandatory maximum stocking limits based on the behavioral and physiological needs of the fish, rather than solely on production metrics.</p> <p><b>Humane Handling and Transport:</b> Handling procedures, which occur during grading, counting, or pre-slaughter, are highly stressful and can cause physical damage, scale loss, and compromised immune systems. The Strategy must mandate protocols that minimize these risks:</p>
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## S6. Additional Arguments

<b>General Argument</b>	<p>In Ireland the rights of animals to freedom from pain, fear and distress, and the freedom to express natural behaviours, are well recognised, in both legislation (Animal Health and Welfare Act 2013) and in national guidance documents (Farm Animal Welfare Advisory Council Guidelines). However, the conditions in which intensively farmed animals are kept often prevent the expression of</p>
<b>Promises Have To Be Kept</b>	<p>It is important that the Government doesn't just make this consultation a box-ticking exercise. The <a href="#">first animal welfare strategy</a> was launched in 2021 with promises around 'sentience' and 'five freedoms' in there but unfortunately it hasn't had significant impact. It is important to emphasise that promises must</p>

<b>Abide by EU Standards</b>	The Irish Government claims the country has significantly high welfare standards, even in relation to live export. Whilst in some areas Ireland does go further than EU legislation in others it is not following EU legislation e.g. calf
<b>Listen to Irish citizens</b>	<p>In March 2023, the <a href="#">European Union asked over 25,000 citizens</a> across all Member States about their views on animal welfare. <a href="#">In Ireland, respondents showed clear support</a> for improving the welfare of sentient beings all across Europe, particularly in relation to how farmed animals are reared and treated.</p> <ul style="list-style-type: none"> <li>● 81% of Irish citizens think the welfare of farm animals should be protected</li> <li>● 97% of Irish citizens think farmed animals should be provided with</li> </ul>

**Don't forget to fill in the Response Form:** <https://forms.gle/sXA12RbSLSXsWE1a6>