ARLArming: Nationwide Arla Farm Investigation

Main Report: Illegality, Label Breaches, & Welfare



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Cover image: an image from the footage that this report is based on.

Supplementary material (here) complements this main report. The supplementary data should be consulted for the precise video timestamps and more farm-specific data that demonstrate the breaches documented in this report.

The report in its entirety was commissioned by Animal Justice Project.

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Headline summary statement
Animal Justice Project recently investigated 16 different Arla-affiliated dairy farms across the UK. This report is based on the 15 that undercover footage was successfully generated from. Phase 1 involved comprehensive undercover footage from 10 primary farms; Phase 2 concerned undercover footage from Open Days on a further seven Arla farms (two of which also featured in the primary cohort). In Phase 1, a total of 360 legislative and Arlagården/Red Tractor breach cases were identified across a total of 29 distinct types. The most common breaches revolved around rough handling, lameness, unsafe equipment use (halter and hip hoist), undrained floors (high faecal load), and uncaring attitudes. However, there were serious less frequent breaches too. A total of 26 additional major welfare problem categories were observed—those not covered by legislation nor Arlagården/Red Tractor provisions. In Phase 2, the Open Day footage demonstrated generally cleaner conditions than in Phase 1. However, across three of the Open Day farms, three illegality cases (and thus also Arlagården/Red Tractor breaches) remained evident: delayed ear tagging, manipulation of sensitive body parts, and undrained floors. There was also an additional breach exclusive to Arlagården/Red Tractor: use of electric shocks on cows. There was no consistent pattern evident in the sample in terms of farm type and welfare-related performance. It would seem all farm types are extremely susceptible to legislative/label breaches and poor welfare outcomes, with the collective evidence pointing towards these problems being systemic in nature.

1 Introduction
Compilations of the most welfare-problematic footage from 10 Arla-associated dairy cow farms in England have been reviewed and assessed for animal welfare violations. The aim was to identify any: 1) illegality, 2) breaches of applicable farm assurance schemes (welfare labels), and 3) remaining significant welfare problems. Profile summaries of the 10 farms and the footage from each can be found in Table 1. Adjacently, as a second phase, excerpts of undercover footage taken at seven Arla dairy farm Open Days were reviewed, in addition to the summary transcripts of this undercover footage. Two of these farms were among the 10 farms in Table 1. This means a review of footage/data from a total of 15 farms was conducted. Phase 1 is the main focus of the bulk of this report; Phase 2 is focused on in section 2.7.

Arla Foods is an international co-operative producing a range of dairy products using milk directly from Arla-associated farms. Its products are distributed to a range of UK supermarkets for use under its own logo/brands or supermarkets' own private labels (Arla Foods, 2024a). As a minimum, Arla-associated farms must meet the cow welfare standards laid out in the Arlagården assurance scheme (Arla Foods, 2024b). These also specify adherence to all national legislative requirements in addition to other country-specific assurance schemes (Arla Foods, 2024b; p. 4). In the UK's case, the country-specific assurance scheme applicable is Red Tractor (2025b). Some Arla farms also subscribe to additional Arla assurance schemes that developed later and that claim to place greater emphasis on welfare—including Arla 360 (Arla Foods, 2018) and Arla CARE (2026). Arla CARE was developed in 2022 and is regarded as the most superior label of the three. As per Table 1 below, evidence points to Arla 360 applying to two farms and Arla CARE to three farms in the present sample; the status of five farms was unknown, so Arlagården has been assumed.

Table 1. Primary farm profiles.

Note: AG indicates Arlagården. Unless otherwise stated, milk volume provided is per year, per cow. Sources: F1 (Cogent, n.d.)*; F2* (VetSalus, 2021)*; F3* (AGT Farms Ltd., 2024)*; F4* (British Dairying, 2024b; Farmers Weekly, 2021, 2024; The Oxford Cow, 2026)*; F5* (AF, 2023; Davis, 2026; DEFRA, 2014; Riverside Dairy, 2026b)*; F6* (Cogent, n.d.)*; F7* (Pilkington Farms, 2026)*; F8* (British Dairying, 2024a; Farmers Weekly, 2025; REAL Success, 2023)*; F9* (White, 2021)*; F10* (Cogent, 2024; UK Dairy Day, 2026)*. Some information has also been gleaned from the primary footage, and also from the Open Farm Sunday transcripts for Farm 9 and 10 (see section 2.7). "+ cleaner" refers to a robotic cleaner being used in addition to robotic milkers.*

	Name	County	Herd size & milk volume (approx.)	Zero-grazing?	Milking type	Exemplar suppliers	Arla scheme	Footage duration	Film date	Open Day?
F1	**Little-wood**	Dorset	240, Friesian, 6,750 litres	N, birth o/s to Nov	Herringbone	Not found	AG (infer)	~15 mins	Oct 2025	N
F2	**Marsh**	Dorset	400, 30 litres/day	N, o/s for Summer	3x, could not see in footage	Not found	AG (infer)	~23 mins	Nov 2025	N
F3	**Leigh Court**	Glouces-tershire	600, no milk volume found	Unknown	Rotary, 2x	Not found	AG (infer)	~8 mins	Dec 2025	N
F4	**Kings-ton Hill**	Oxford-shire	800, crosses, 8,300 litres	N, f-p o/s bar Dec/Jan	Rotary	Tesco, The Oxford Cow Ice Cream	AG (infer)	~8 mins	Jan 2026	N
F5	**River-side Church**	Bedford-shire	200 crosses, 5,500 litres	N	Herringbone	Ice cream to Morrisons, Riverside Dairy Ice Cream	CARE	~33 mins	Feb 2026	N
F6	**Long-lands**	Dorset	320, kiwi Xs, 5,250 litres	N, o/s bar calving	Herringbone	Morrisons	360	~56 mins	Mar 2026	N
F7	**Bram-leys**	Northam-ptonshire	600, Fr. Xs, 6,200 litres	N, only Dec/Jan	Herringbone	Tesco SD Group	CARE	~1 min	Mar 2026	N
F8	**Oak Lodge**	Leicester-shire	220, Holstein, 13,000 litres	Y	Robotic + cleaner	Tesco SD Group	AG (infer)	~34 mins	Mar 2026	N
F9	**Lower House**	Worcest-ershire	120, 9,000 litres min	N	Robotic	Not found	CARE	~12 mins	Apr 2026	Y
F10	**Long-lands**	Derby-shire	230 to 400, Holstein, 12,500 litres	Y	Robotic, 3x	Starbucks	360	~37 mins	Jul 2026	Y

1.1 Legislation, code, & welfare labels

Legislation pertaining to this footage includes the following:

- Animal Welfare Act, 2006
- The Welfare of Farmed Animals (England) Regulations, 2007
- The Cattle Identification Regulations, 2007
- The Animal By-Products (Enforcement) (England) Regulations, 2013

Additionally, DEFRA'S Code of Practice for the Welfare of Cattle (DEFRA, 2024) and DEFRA's Guidance on what to do after a calf is born (DEFRA, 2022) explain how these pieces of legislation should be complied with. Extracts from these five pieces of legislation/code that relate exclusively to the illegality and breaches uncovered can be found

in Appendix A.

Alongside this legislative framework the most relevant extracts from: 1) the Red Tractor (2025) requirements, and 2) Arlagården standards, can also be found in Appendix A. No publicly available standards appear available for the Arla CARE farm assurance scheme. The webpage for Arla CARE does state that "defined standards" are in place and that some extent of grazing is required (Arla Foods, 2026), but no further details are available. At the time of writing, Arla Foods has not responded to calls or emails that have requested this information. The requirements for Arla 360 similarly seem opaque (Arla Foods, 2018), with the only publicly available requirements appearing second-hand via Aldi (2021; p. 18) and Morrisons (2019; p. 17). Unlike Arla CARE, Arla 360 is not afforded its own webpage. It is unusual for a farm assurance scheme to not make such standards publicly available and to not have its own webpage. Based on the unofficial information available, the extra requirements are not factors amounting to tangible differences *for the purposes of reviewing this footage*. It is clear that both Arla 360 and Arla CARE place emphasis on tracking welfare outcomes; however, this is already focused on within Arlagården (via Red Tractor). The main substantial difference seems to be the requirement for calf grouping within a shorter timeframe and a minimum period of grazing (the latter for CARE only). These are not things that could be ascertained from the footage in any case.

2 Findings & discussion

2.1 General

Tables 2 to 4 comprise the basis of this report's findings. Table 2 records the estimated illegality and label breach count in the footage; Table 3 details the precise legislative, code, or label standard provisions applicable to the identified breaches (with these provisions presented in full in Appendix A); and Table 4 summarises additional welfare problems identified in the footage (those not captured by legislation or label standards). The Appendix B. Supplementary data also contains essential information for this report. It documents the data from individual farms (Tables S1 to S10), which include details of each specific breach or welfare case along with timestamps, a description of the concern, and a severity category.

First, the legislative/label breaches and additional welfare problems identified will be outlined. This will be followed by: commentary on any pattens noticed in the findings in how they relate to the farms sampled; brief consideration of supermarket welfare standards; a welfare impact summary; incorporation of Open Day farm footage; and, finally, further comparisons of the findings with those from other investigations and extant literature.

2.2 Legislative & label breaches

Across the primary 10 farms, a conservative estimated total of 360 breaches were identified, as outlined in Table 2. These comprised 359 legislative *and* label breaches (both Arlagården and Red Tractor combined, as outlined in Box 1) of identical categories, and one breach unique to Arlagården/Red Tractor. The total of 360 breaches comprised 29 distinct categories. Total cases for each breach category varied from one to 58. The conservative nature of these estimated counts is described in Box 2.

Table 2 illustrates how seven of the 29 breach categories (24%) had 20 or more identified cases. Collectively, these seven categories represent almost 80% (79%, 283/360) of all breaches identified. However, it should be noted that three of these seven categories were distinct forms of rough handling. Together, these three forms of rough handling[1] alone constitute

Box 1. Grouping Arlagården & Red Tractor

- While Arlagården has additional requirements to Red Tractor, generally the additional requirements to not cover animal welfare.
- Arlagården still also requires Red Tractor standards to be met.
- Hence, Arlagården and Red Tractor have been considered as one in regard to label breaches for the purpose of this report.

[1] Two other categories listed in Table 2 (with fewer than 10 cases) could also be interpreted as rough handling: forceful tube

39% (140/360) of all breach cases. With rough handling aggregated, the most common three forms of legislative and label breaches will be discussed further: rough handling, lameness, and unsafe equipment use (halter and hip hoist).

2.2.1 Rough handling

For adult cows, most cases of rough handling transpired as follows: at the entrance to the milking parlour (particularly static parlours such as the herringbone); at the entrance to and restraint within a crush; and when demanding a cow act in a certain way immediately, often without force-free methods attempted first nor assuring sufficient space ahead of cows for them to move into, or other such clarity. For calves, most rough handling pertained to their relocation via dragging or pushing/shoving. *Exemplar* particularly severe cases of rough handling included:

- Excessive force used on sensitive areas:
    - Systemic repeated tail twisting/pulling (e.g., LWRH, 00:12, Farm 1, Table S1);
    - Staff insertion of fingers in cows' nostrils as a means of head restraint (LWC, 00:44, Farm 1, Table S1) or to move a downer cow (LLPC, 1:54, Farm 10, Table S10);
    - Bashing a cow's neck/spine repeatedly with an overhead gate lever (LLRH, 1:35, Farm 6, Table S6);
- Gratuitous smack after worker slips (LHRH, 00:10, Farm 9, Table S9);
- Hitting cow hard with gate (LHRH, 00:45, Farm 9, Table S9);
- Very hard double-handed smacks (LHRH, 00:55, Farm 9, Table S9).

Concerningly, a farmer's children can also be seen joining in with hitting cows (e.g., LLRH, 2:40, Farm 10, Table S10).

Box 2. Conservative method

Exemplar ways in which this analysis has been conservative in its approach include:

- Particularly light hits have been excluded from illegality/label breaches.
- All illegality and label breaches demonstrate "uncaring attitudes", so could technically constitute 300+ further violations. However, uncaring attitudes have only been counted separately in shouting/swearing cases or cases of worker distraction.
- Only severe cases of lameness have been included amongst the illegality and label breaches—generally those aligning with scores of an upper range of 2 or 3, as per Red Tractor's Appendix for HF.1.e (Red Tractor, 2025). Cows with less severe lameness may be receiving treatment and under monitoring.
- Most potential cases of overgrown hooves have been excluded both as a breach and as a welfare problem as hoof status is insufficiently clear from the footage.
- An underestimation of the total breaches due to, for instance, 10 hits in close succession potentially being grouped as one.
- Some cases may involve several breaches in one, and these were usually placed in the most apparent category rather than in multiple. Re-watching the footage multiple times in dedication to each specific breach category would elevate the figures.
- A general principle was adopted that where there was doubt, the benefit of the doubt was given (e.g., see calf water provision discussed in section 2.2 and timing of mother/calf separation in section 2.3).
- Calving pattern (e.g., year-round or seasonal) has not been considered, such as in section 2.4.
- The estimated total of breaches applicable to both legislation and Arlagården/Red Tractor could be doubled, if not trebled, to account for *three separate institutional breaches* (i.e., the two labels of Red Tractor and Arlagården in addition to legislation). In light of section 2.5, it could even be quadrupled on account of some supermarket standards.
- Only the compilation footage has been assessed. Additional breaches can be found in the full footage.

<u>The joint illegality and label breach of hitting sensitive areas, and label breaches of hitting of *any* kind afford the most clearcut breaches. This is because in both cases the acts are *explicitly* forbidden (see Table 3 and Appendix A). Thus, no other interpretation can be drawn</u>. Accordingly, it should be noted that Red Tractor's prohibition of rough handling and use of force of any kind is more explicit than in legislation or DEFRA's Code. For instance, in the Appendix of provision AH.6, Red Tractor explicitly forbids striking/kicking any animal, dropping animals, lifting or dragging in any way that may cause harm, and tail twisting (Red Tractor, 2025b). In contrast, legislation does not forbid *any* application of moderate and well-judged force *as a last resort*; indeed, it even

feeding of calves and use of force to encourage calves to feed from artificial teats. This would further elevate the rough handling case number. Unsafe and misuse of a hip hoist is also a form of rough handling, but this has been afforded its own separate category due to the unique nature of it.

leaves the door open to minimal electric goad use. Such rough handling has not been recorded as additional breaches unique to the Arlagården/Red Tractor requirements as all included cases of rough handling were deemed to meet the threshold for illegality, not just label breaches.

2.2.2 Lameness

Lameness was the next most common breach identified: 14% of all cases (50/360). The lameness cases identified as breaches were such, not because lameness is a breach in and of itself, but because the cows' lameness was to a sufficient degree that they should be afforded as much rest and treatment as possible (see Box 2). Portable milkers can be used in-situ where lame cows need to be milked. Exemplar particularly severe cases include:

- Extremely abnormal gait, head bob, and slow speed (MDCS, 7:26, Farm 2, Table S2; KHL, 0:16, Farm 4, Table S4);
- 30-minute attempt to step onto cubicle (OLL1, 5:43, Farm 8, Table S8);
- Foot held up for an hour (OLL5, 5:12, Farm 8, Table S8);
- Inappropriate use of shackles (MHC, 1:39, Farm 2, Table S2);
- Swollen areas and possible infection (LCWB, 1:48, Farm 3, Table S3).

2.2.3 Unsafe equipment use (crush, halter, & hip hoist)

While use of mechanical equipment has the potential to improve welfare if used appropriately, it also introduces new welfare risks as staff may use it incorrectly or in inappropriate situations. Such unsafe and inappropriate equipment use was evident in Farms 3 and 10 (halter and hip hoist), and Farm 5 (crush), amounting to 11% of all legislative/label breaches. The unsafe use of the halter and hip hoist requires further explanation.

Clear instructions exist on how hip hoists should be used. For instance, following prior footage of unsafe use of hip hoists, the British Cattle Veterinary Association affirms they are to be solely used for the purpose of aiding a cow to stand who can still bear her own weight, to test improvement in a downer cow's ability to bear her own weight when undergoing treatment, or for turning a downer cow onto a new side (with appropriate support) (BCVA, 2022; Walker, 2022). Armor Animal Health (2025) and Synergy Animal Health (Perry, 2026) also have comprehensive documents outlining similar appropriate use. Meanwhile, a halter should be used as a head support only, to guide direction, or to prevent escape when a hip hoist is still attached (Perry, 2026). In violation of these instructions on safe/appropriate use, footage from Farms 3 and 10 demonstrated the following:

- Use of head halter to pull a laterally recumbent cow up—both manually and via attachment to a tractor (e.g., LLRH: 1:05, Farm 10, Table S10); and
- Use of hip hoist for relocating or repositioning downer cows, which frequently involved:
    - Cows being lifted exceedingly high, close to an upside-down vertical position (e.g., LCWB2: 9:42, Farm 3, Table S3)—regularly with their back feet off the ground and sometimes with all four feet off the ground (e.g., LLDC: 9:25, Farm 10, Table S10);
    - Cows' forelegs, faces, and necks being dragged along hard floors (e.g., LLDC: 0:04, Farm 10, Table S10) or around pens (e.g., LCWB2: 4:31, Farm 3, Table S3);
    - Cows' heads being dangerously close to tractor wheels (e.g., LCWB2: 10:58, Farm 3, Table S3);
    - Cows being bashed into other objects (e.g., a wheelbarrow in LLDC: 1:32, Farm 10, Table S10);
    - Hip hoist being attached while cow is in lateral recumbency—even more dangerous (e.g., LLDC: 8:11, Farm 10, Table S10).
- Hip hoists were overwhelmingly used without a halter or girth strap. Any cases of use with a girth strap (e.g., LCWB2: 8:14, Farm 3, Table S3) were afforded the benefit of the doubt and excluded from breaches.

- Such unsafe equipment use continued despite evidence of body sores at the sites of hip hoist attachment (e.g., LLDC: 5:25, Farm 10, Table S10).

Thus, such uses point toward illegality and label breaches. The MSD Veterinary Manual reinforces how their "*proper use requires experience, skill, and a delicate touch*" (Grünberg, 2026). It is clear that, *as an absolute minimum*, a girth strap or full body swing should be used in conjunction with any hoist, as visually depicted and summarised by Synergy Farm health (Perry, 2026) and others such as Armor Animal Health (2025). As a means of avoiding getting to such points of deterioration, cow baths should be in more frequent use (e.g., Steinfort AgVet, 2026).

There appears to be a culture of acceptance around farms' misuse and unsafe use of these pieces of equipment. More legislative oversight is required. Notably, misuse of mechanical equipment could be interpreted as a further form of rough handling. Misuse of mechanical equipment in these cases also further relate to lameness. This is because milder forms of lameness will be a key reason for use of the crush (for treatment), and more severe forms of lameness (to the point of non-standing/downer cows) for use of the hip hoist. This means there can often be overlap and interconnection between the most common breaches identified in this footage.

2.2.4 Less frequent breaches

It is important for the most frequent breaches to receive ample attention. However, the incredibly serious nature of some of the less frequent breaches must also be underscored. This is in terms of the critical risks the breaches pose to calf/cow welfare—potentially even fatal consequences. Among those with fewer than 20 cases, such *particularly* concerning breaches included:

- Dangerous method of tube feeding.
    - AHDB (2026) describes how staff should check for correct placement of feeding tubes before releasing feed. This is done by manually feeling for a stiffened oesophagus to ensure the tube has not been inserted into the windpipe in error, which can be fatal. Such checks are absent in the cases of tube feeding evident in the footage. AHDB also states calves should be standing when receiving a tube feed and that staff should check the length of the tube for each individual calf. Again, both of these aspects are absent in the footage (e.g., MC, 0:40, Farm 2, Table S2; LLC, 4:13, Farm 6, Table S6).
- Dangerous intervention.
    - Enormous pliers were used in very close proximity to a cow's eye (LWC, 2:48, Farm 1, Table S1).
- Highly soiled calf bedding.
    - Virtually the entirety of calves' hutches and run areas were covered with dark-coloured straw (relative to the light colour of straw on the outer rim), demonstrating its soiled and wet condition and how the calves were left with no dry space (e.g., LCCC, 1:40, 1:58, 2:05, Farm 3, Table S3).

Some of these breaches will be further discussed in section 2.8. The one breach *unique* to Arlagården/Red Tractor concerned a lack of permanent water provision to calves. Legislation only requires this in particularly hot weather conditions or when calves are ill. However, there is an ambiguity here as DEFRA's Code—intended to explain how to meet the legislative requirements—appears to conflict with the legislation in that it states water should be provided in the pen (without further qualification). In line with the conservative approach taken in this analysis (see Box 2), the benefit of the doubt has been given to the farm, by allocating this exclusively as a label breach rather than a legislative breach as well.

Table 2. Estimated illegality & label breaches in the footage from the primary 10 farms.

Note: Categories are listed in order of prevalence, beginning with the most prevalent. In the column headings, L indicates legal breaches and RT/AG indicates Red Tractor/Arlagården breaches (combined, as per Box 1). Empty grey boxes indicate zero counts.

Category of illegality or label breach	L	RT/AG	Total cases	F1	F2	F3	F4	F5	F6	F7	F8	F9	F10	Total farms
Rough handling: general	Y	Y	58	10		5	4	3	6	2	6	6	16	9
Rough handling: sensitive areas	Y	Y	56	26			1	15	8	1		2	3	7
Lameness cases (non-hospitalised, score 2-3)	Y	Y	50		2	5	7	10	1		25			6
Equipment: unsafe use	Y	Y	39			9		7					23	3
Undrained floors	Y	Y	29	2	2		1		7	2	4	3	8	8
Calves: rough handling (drag, push, shove)	Y	Y	26		9	5			12					3
Uncaring attitudes	Y	Y	25	3	1	1	5	1	3	1		4	6	9
Bedding: soiled (calves & adult)	Y	Y	14			8							6	2
Bedding: insufficient (cubicle) + body sores	Y	Y	11			1		10						2
Calves: ear tagging, no head restraint	Y	Y	8		1				7					2
Calves: excessive force, feeding at artificial teats	Y	Y	8		6	1			1					3
Neglect	Y	Y	5	2					2				1	3
Calves: dangerous method of tube feeding	Y	Y	4		3				1					2
Intimidation tactics (incl. dogs)	Y	Y	4	4										1
Restraint (prolonged, excessive, avoidable: hoist considered separate)	Y	Y	4	2								2		2
Slippery floor	Y	Y	4						1	1		2		3
Equipment: improper use (shackles)	Y	Y	3			1			1				1	3
Birthing disturbance	Y	Y	1						1					1
Calves: inadequate feeding	Y	Y	1						1					1
Calves: very young ear tagging	Y	Y	1						1					1
Dead cows (inadequate storage)	Y	Y	1		1									1
Equipment: dangerous intervention	Y	Y	1	1										1
Hygiene (worker urinates)	Y	Y	1									1		1
Ill cow (unisolated)	Y	Y	1						1					1
Overgrown hooves	Y	Y	1			1								1
Bedding: absent for hospitalised cow in extremely poor state	Y	Y	1										1	1
Rough handling: use of inappropriate goad	Y	Y	1										1	1
Contaminated calf water	Y	Y	1			1								1
Inadequate calf water provision	N	Y	1			1								1

CASE TOTALS	**360**	50	25	39	18	46	54	7	35	20	66
CATEGORY TOTALS	**29**	8	8	12	5	6	16	5	3	7	10

Table 3. Specific legislative, code, & standards provisions breached.

Note: The Animal Welfare Act 2006 is abbreviated to AWA, The Welfare of Farmed Animals (England) Regulations 2007 to WOFA, and The Animal By-Products (Enforcement) (England) Regulations, 2013 to ABPR. DEFRA's Code of Practice for the Welfare of Cattle is cited as DEFRA (2024). "s." refers to section, "Sch. to a schedule within legislation, and "pt" to point. DEFRA's Code (2020) is only cited if its content adds something extra to that contained in legislation. Label references are distinguished by green font. This table pertains only to the undercover footage from the 10 primary farms. See section 2.7 for Open Day footage.

Category of illegality or label breach	Specific legislative, code, & standards provisions
Rough handling: sensitive areas	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1; DEFRA (2024; pts. 5, 8, 14); Red Tractor (2025a, pt. 6; 2025b, appendix of AH.6); Arla Foods (2024b; p. 4)
Rough handling: general	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1; DEFRA (2024; pts. 5, 8, 14); Red Tractor (2025a, pt. 6; 2025b, appendix of AH.6); Arla Foods (2024b; p. 4)
Lameness	AWA, s. 4, s. 9, s. 14.4; DEFRA (2024; pts. 5, 8, 12, 15, 31, 33); Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Equipment: unsafe use	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1, 9, 11, 12; DEFRA (2024; pt. 125); Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Undrained floors	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1; DEFRA (2024; pt. 5, 8, 14, 15, 58, 63, 68); Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Uncaring attitudes	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1; DEFRA (2024; pts. 5, 8, 14); Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Calves: rough handling (drag, push, shove)	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1; DEFRA (2024; pts. 2, 5, 8, 14); Red Tractor (2025a, pt. 6; 2025b, appendix of AH.6); Arla Foods (2024b; p. 4)
Bedding: insufficient (cubicle) + body sores	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1; DEFRA (2024; pts. 66, 68); Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Bedding: soiled (calves & adult)	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1, 4; WOFA Sch. 6, s. 6.1, 7b, 8; DEFRA (2024; pts. 57, 62, 111); Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Calves: ear tagging, no head restraint	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1; DEFRA (2024;pts. 18, 19; 2022; pt. 19); Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Calves: excessive force, feeding at artificial teats	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1; DEFRA (2024; pts. 2, 5, 8, 14); Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Neglect (cows left unsupervised in restraints, dogs left in calf pens, ill cows untended)	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1, 9; DEFRA (2024; pts. 10, 11, 16, 109); Red Tractor (2025a, pt. 6; 2025b, AH.6.c); Arla Foods (2024b; p. 4)
Calves: dangerous method of tube feeding	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1; DEFRA (2024; pts. 5, 8, 103); Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Intimidation tactics (incl. dogs)	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1; DEFRA (2024; pts. 5, 8, 14); Red Tractor (2025a, pt. 6; 2025b, AH.6.c); Arla Foods (2024b; p. 4)
Restraint (prolonged, excessive, avoidable)	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1; DEFRA (2024; pts. 10, 11, 16); Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Slippery floor	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1; DEFRA (2024; pts. 5, 8, 14, 15, 58); Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Equipment: improper use (shackles)	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1; DEFRA (2024; pts. 5, 8, 12, 15, 31, 33); Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Birthing disturbance	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1; DEFRA (2024; pt. 91, 94); Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Calves: inadequate feeding	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1, 24; Sch. 6, s. 12.1; Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Calves: very young ear tagging	AWA, s. 4, s. 9; WOFA Sch. 1, s. 1; DEFRA (2024; pts. 18, 19); Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Dead cows (inadequate storage)	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1; ABPR, s. 4.3 Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Equipment: dangerous intervention	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1, 5, 11; DEFRA (2024; pts. 9, 13, 39); Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)

Hygiene (worker urinates)	AWA, s. 4, s. 9, s. 14.4; DEFRA (2024; pts. 23, 28); Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Ill cow (unisolated)	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1, 6; Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Overgrown hooves	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1; DEFRA (2024; pts. 9, 125); Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Bedding: absent for hospitalised cow in extremely poor state	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1; DEFRA (2024; pts. 9, 31); Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Contaminated water	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1, 23, 25, 26; Red Tractor (2025a; pt. 6); Arla Foods (2024b; p. 4)
Rough handling: inappropriate goad	AWA, s. 4, s. 9, s. 14.4; WOFA Sch. 1, s. 1; DEFRA (2024; pts. 5, 8, 14); Red Tractor (2025a; pt. 6; 2025b, appendix of AH.6); Arla Foods (2024b; p. 4)
Red Tractor & Arlagården only: inad. calf water	Red Tractor (2025; CR.3); Arla Foods (2024b; p. 4)

2.3 Additional welfare problems

Table 4 illustrates that, among additional welfare problems evident in the footage, a poor body condition score (BCS) was the most common problem in terms of prevalence across the farms—at seven of the 10 (70%). This was followed by mother and calf distress in the midst of, and after, their separation, which was documented in the footage of four farms. It is important to note the absence of mother/calf separation distress from the footage of other farms does not mean it does not exist on these farms, but rather that mother/calf separation cases were not captured on the footage. Indeed, both poor BCSs and distress from mother/calf separation are arguably inherent to the current operational realities on most commercial dairy farms. Thus, the documented prevalence of these welfare problems is not surprising. It is important to note that some stakeholders may challenge the poor BCS categorisation of many cows in the footage. This is because many mainstream BCS charts factor in optimal efficiency and milk production, rather than solely focusing on optimal weight for cow health and welfare (DEFRA, 2001). Additionally, due to the extreme outputs that have normally been genetically selected for in dairy cows, sometimes, despite best efforts, a dairy cow simply cannot comfortably/naturally consume sufficient amounts to replenish energy used in the cycle of repeated pregnancy and milk production (Martens, 2023).

Whilst the footage demonstrated mother/calf separations considerably more premature than the legal minimum of 12 hours, the footage did not provide sufficient evidence to deem these definitive breaches. This is because such premature separations *are* permitted for disease control reasons or, relatedly, if the mother's colostrum is deemed of inadequate quality. The reasoning for the premature separations in the footage is unclear. Mother/calf separation distress is evident in the footage in the form of: calf cries, calf trailer escape attempts, mother bellows, mother pacing/seeking, and mother following staff/trailer. Through ample footage of bonding between mother and calf prior to separation (e.g., seeking close proximity, grooming, mutual affection), the extent of the positive welfare opportunity forgone through the severance of such essential relationships is also accentuated.

Table 4. Additional welfare problems identified in the footage across the primary 10 farms.

Note: This alphabetical list focuses on key additional welfare problems; it is not exhaustive. Citations refer to recent key authoritative literature discussing the applicable welfare concern, as follows: 1 refers to EFSA, (2023b)*; 2 to EFSA* (2023a)*; 3 to Animal Welfare Committee* (2021)*; 4 to Hayer et al.* (2022)*; 5 to World Organisation for Animal Health* (2025)*; 6 to Mace and Knight* (2023)*; 7 to EFSA* (2009)*; 8 to Grandin* (2021)*; 9 to Grünberg (2026); 10 to (DEFRA, 2024a); 11 to Sandem et al.* (2006)*.*

Citation	Category of welfare problem (not illegal nor a label breach)	F1	F2	F3	F4	F5	F6	F7	F8	F9	F10	Total farms
1	Alopecia (hair loss)			Y								1
1,3	Body lesions		Y		Y						Y	2

2,3	Calves: abnormal/redirected behaviours		Y				Y					2
2	Calves: mortality			Y								1
4	Calves: ear tagging, general		Y				Y					2
3	Calves: feed provision inadequacies			Y								1
2,3	Calves: injury risk in trailer		Y									1
2	Calves: use of hutches			Y								1
2	Calves: vocalisations			Y								1
2	Calves: weak			Y								1
1,2,3	Diarrhoea/scour (calves & adults)		Y								Y	1
5,6	Disease risk (mixing species)						Y					1
9	Downer cow: gastric tube use			Y								1
1	Downer cow: water access			Y							Y	2
2	Escape attempts			Y								1
1	General (di)stress						Y					1
10	Laboured breathing			Y							Y	1
1,3	Lameness (< score 3)	Y	Y								Y	2
7	Large udders	Y					Y		Y			3
9	Lateral recumbency										Y	1
2,3	Mother/calf separation distress	Y	Y				Y			Y		4
2,3	Mother/calf separation: premature						Y					1
1,3	Poor BCS	Y	Y	Y	Y	Y	Y		Y		Y	7
8	Restraint stress					Y						1
1	Soiled bodies		Y	Y					Y		Y	3
11	Wide eyes (fear/distress indicator)										Y	1
	TOTAL CATEGORY NUMBER PER FARM	4	9	12	2	2	8	0	3	1	9	

2.4 Patterns

2.4.1 Farms of greatest & least concern

Table 2 documents how Farms 6 and 10 ranked the highest (worst) in terms of the number of legislative/label breach *cases* (54 and 66, respectively). These same two farms continue to feature in the worst three farms when also considering the highest number of legislative/label breach *categories* and the number of welfare concern categories evident. The footage from these farms was the longest in duration—approximately one hour for Farm 6 and 37 minutes for Farm 10, as per Table 1. However, these footage durations are indicative of the extensive problems found in the undercover footage, and so reflects a reality of more extensive problems on the farm. Farm 1 ranked third in terms of the highest number of legislative/label breaches, with a total of 50 breaches. Of note is that both Farms 1 and 6 are part of the Holmes Farm group in Dorset; this could potentially result in more similar management styles—and thus similar legislative/label breaches and welfare outcomes. No other consistent patterns between the worst performing farms were noted, as discussed further in sections 2.4.2 to 2.4.5.

Conversely, Farm 7 had both the lowest number of breach *cases* and welfare categories present in its footage. It also had the joint (with Farm 4) second lowest number of breach *categories*, with two breach categories more than Farm 8. These relatively lower counts are expected for Farm 7 as its footage was only around one minute in length. Nevertheless, the footage reviewed was a compilation of the most problematic parts, meaning it could indeed

be a farm with fewer breaches and welfare concerns overall. If this is the case, Table 1 can be consulted to see if there are any immediately apparent reasons to potentially explain this. It is noteworthy that Farm 7 is an Arla CARE farm. However, there is no consistent pattern of comparatively less poor performance at the sampled Arla CARE farms. See section 2.4.4 for more on Arla CARE farms.

2.4.2 Farm management

Unfortunately, the extensive experience of the farm management/ownership or reputable status of the farms did not appear to make observations of illegality and label breaches less likely. For instance, it often appeared to be the farm owners perpetrating many of the breaches (e.g., in Farm 9). Moreover, Farms 1 and 6 had some of the most prevalent breaches, yet the ultimate owner of these farms is on the Board of Directors with Arla (Arla, 2026). The management/owner of Farm 4 is: on Arla Foods' Board of Representatives, the Chair of the Arla Policy Advisory Group, a member of Arla Tesco Committee, and the Chair of the South East Advisory Board of NFU Mutual (Wynnstay PLC, 2026). Similarly, the owner of Farm 5 is a member of the Arla Regeneration Pilot Network, on the NFU Board, a Director with Anglian Farming and more (A. F. Group, 2026; NFU, 2026)—Farm 5 also ranked fourth worst in terms of poor performance (number of legislative/label breach cases). Both Farm 4 and 5 owners were also former directors of Milk Link, which merged with Arla Foods in 2012. Farm 5 has won recent ice cream awards (Riverside Dairy, 2026a) and Farm 8 has been a finalist in the prestigious 2024 NMR RABDF Gold Cup (Macmillan, 2025).

2.4.3 Zero-grazing farms & related factors

Two of the 10 farms were zero-grazing farms: Farm 8 and Farm 10. Zero-grazing means the cows are never permitted to roam and graze on grass at any point in the year. One of these farms (Farm 8) had the highest number of severely lame cows—50% of all lameness breaches (25/50, see Table 2).The other (Farm 10) also had extensive problems with lameness as demonstrated through downer cows (evident in unsafe equipment use) and lameness as a welfare concern in Table 4. Literature does tend to suggest an increased lameness risk for cows without grazing access (Harvey et al., 2025, pp. 12, 15, 18). However, it is not always clearcut and optimal management can reduce the risk of certain forms of lameness in indoor housing setups, as also suggested by the UK government's Animal Welfare Committee advisory body (2021, p. 20).

Both Farms 8 and 10 also appear to be the only farms of the sample to farm cows exclusively of the Holstein breed (see Table 1). In accordance with the breed's known characteristics, both farms appear to have up to double the milk production of some of the other farms per single cow per year. The herd sizes on these farms are among the smallest of those in this sample (Table 1). Evidence has similarly pointed to all of these factors (milk yield, breed, herd size) as possible aggravators of lameness, along with other welfare problems such as body condition score and multiparity (Oehm et al., 2019)—though it is typically *larger* herd sizes that are associated with increased lameness, not smaller herd sizes. From the footage alone, it is not possible to state more as to the precise cause or type of lameness. There also did not seem to be any apparent pattern of more lameness or body sores in the footage collected from farms over Winter versus Spring/Summer.

Both of these farms also used robotic milkers, with most other farms using rotary or static (e.g., herringbone) parlour types. Robotic milkers may be particularly associated with zero-grazing farms. In the literature, most emphasis is placed on the advantages conferred by robotic milkers (e.g., Kappel et al., 2026), rather than which conventional static or rotary system may confer the highest welfare risks, thus use of robotic milkers may not be a key welfare concern. However, this is further discussed in section 2.7.

As discussed in previous sections, notably, one of these zero-grazing farms (Farm 10) ranked the worst in terms of the highest number of illegality/label breach cases *and* breach

categories—and second worst in terms of number of welfare concern categories evident. Given the lack of consistent patterns evident in the sample in terms of farm type and welfare-related performance, it is not possible to infer that welfare and legislative enforcement may be worse on one type of farm than another; it would seem all farm types in this sample are at high risk of legislative/label breaches and poor welfare outcomes.

2.4.4 Robotic dung cleaners

Undrained floors were the fourth most common type of breach in this sample (after rough handling, unhospitalised cases of severe lameness, and unsafe equipment use). Thus, robotic dung cleaners could be a crucial and easily accessible aid for keeping passageways in a considerably cleaner and less slippery condition. Indeed, a robotic dung cleaner was only evident in Farm 8's footage (e.g., see OLL1: 5:14), and it is noteworthy that Farm 8 is only one of two farms (the other being Farm 3) that did not have a breach surrounding undrained floors. There is also literary evidence to support cleaner floors in farms using a robotic dung cleaner (as but one example see Zähner et al., 2019). In contrast, some of the worst floors were observed in Farm 10's footage. While Farm 10 publicly states that they installed Lely C2 Collector robotic cleaners in January 2025 (Lely, 2025), such devices were absent from Farm 10's undercover footage. Some floors at Farm 10 even remained heavily soiled (to an illegal extent) in the Open Day footage (see section 2.7). The reasoning for the absence of the robotic dung cleaners is unknown, but the undrained floors evident at this farm should therefore not count against use of robotic dung cleaners. Of course, in the event of temporary malfunctioning of the robotic dung cleaners, management remain legally obliged to manually clean the passageway floors a minimum of twice daily.

2.4.5 Arla CARE & 360

Notably, the three Arla CARE farms (Farms 5, 7, and 9)—that should be leading in terms of welfare standards out of all farms sampled—still demonstrated considerable legislative and label breaches, as well as additional welfare problems. There was also no consistent pattern, such as all Arla CARE farms having the fewest or highest number of breaches or welfare problems; Farm 5 recorded the fourth most frequent breach cases, Farm 7 the fewest, and Farm 9 a moderate number. *Exemplar* particularly concerning breaches on Arla CARE farms included:

- Farm 5: Insufficient bedding and cow-based indicators of this through extensive body sores (see Table S5).
- Farm 5: Unsafe use of the crush when inspecting/treating cows' feet. Staff did not use a belly strap or an otherwise specially tailored crush for foot treatment, as deemed essential (Health & Safety Executive, 2012, pp. 2–3). This resulted in a cow falling to her knees several times. One cow also had her head stuck in the crush bars; despite her struggle and bellows, staff did not seem to pay attention (see Table S5).
- Farm 9: Urination by staff into cow pen or holding area (see Table S9).

Similarly, Farm 6 and Farm 10 were the only other non-CARE farms that appear to be part of the Arla 360 programme (see Table 1). Rather than conferring higher welfare, these farms consistently ranked among the three worst farms in terms of apparent number of breaches (both in terms of categories and cases) and additional welfare problems evident.

2.5 Supermarket claims

The supply chain usually seems insufficiently publicly transparent to know exactly which products milk from certain Arlagården farms can ultimately become. According to Arla, it could include some supermarkets' own brand milk (Arla Foods, 2024a, p. 171). Tables 1 and 5 highlight Tesco and Aldi as destination supermarkets for the milk from the Arlagården farms in the sample. These supermarkets all seem to require Red Tractor assurance standards as a minimum (which is part and parcel of Arlagården requirements in any case). Thus, all documented breaches are arguably also breaches of supermarket requirements. Tesco and Aldi seem to give the impression of welfare safeguards in place additional to

requirements of Red Tractor/Arlagården (Aldi, 2024; Tesco, 2025). However, often there is insufficient detail to ascertain for definite if a policy is genuinely an extra requirement or not. In other cases, additional welfare requirements are claimed, but unfounded. For instance, Tesco Sustainable Dairy Group (into which all own-brand milk falls) highlights that it does not permit tethering or fully slatted floors (Tesco, 2025, p. 29). Yet, these requirements are already included within the Red Tractor standards; thus, standards prove somewhat circular and repetitive—a form of welfare washing (DEFRA, 2021; Mata & Marques, 2026). Morrisons and Starbucks are not considered further here as they require Arla 360 (Starbucks at least in the case of its contract with Farm 10 in this sample). As previously discussed, the welfare requirements of the Arla 360 scheme are not readily available, so no comparisons can be made as to whether these outlets go beyond the Arla 360 standards as a minimum. However, it is of note that Starbucks appears to have little to say on dairy cow welfare other than that they source their milk from Arla with weblinks to further information not functioning at the time of writing (Starbucks, 2026).

2.6 Welfare impact

It is not controversial to state that animal welfare comprises mental, physiological, and behavioural components. Indeed, this is the understanding that legislation is based on. Thus, the occurrence of the illegality and other breaches outlined above, along with the further welfare insults outlined, is going to either be significantly reducing the welfare of the cows/calves or, at the very least, be significantly increasing *the risk* of seriously compromising their welfare. The cows will have *avoidable and unnecessary* increased levels of distress and discomfort, which violates the *Animal Welfare Act 2006* (s. 4, s. 9). Stress and poor welfare more generally are also accumulative with every further welfare compromise (big or small) leading to subsequent reduced resilience in an animal to cope with their (highly challenging, in this case) living situation (Moberg & Mench, 2000).

It should be noted that just because the additional welfare problems (Table 4) are not covered by legislation nor label standards to date, this does not automatically indicate that they are of lower welfare concern. Whilst legislation and farm assurance schemes seek to outlaw the most severe welfare insults, where this may conflict with what are perceived as "essential" farm operations, farm operations are typically favoured (such as in the case of mother/calf separations, as but one example). Accordingly, the individual farm data in the Appendix B. Supplementary data still records many *legal* welfare problems as *severe*, while some *illegal* problems may be marked as *moderate*.

2.7 Comparisons: Open Day footage

Table 5 summarises the details of the seven farms from where the Open Day footage originated. OF1 and OF2 also feature among the primary 10 farms investigated (Farm 9 and Farm 10, respectively). Thus, comparisons between the Open Day footage/data and the footage from the same farms in the first phase is particularly of interest. Four of these seven farms are Arla CARE farms.

Generally speaking, conditions on the Open Day farms were much cleaner and more presentable than demonstrated in the undercover footage. This is to be expected for planned public displays. Despite the planned public display, however, the following remained evident (examples refer to video file number followed by timestamp, if applicable):

- Three legislative and four label breach cases. Three were both legislative and label breaches. The first was regarding **delayed ear-tagging** (OF1 [Farm 9], 06.8:09); the farmer did not seem to be aware that ear tagging is required by 36 hours of age (DEFRA, 2022). The second concerned **rough handling of a sensitive body part** (tail twisting) when forcing a cow into a crush (OF2 [Farm 10], 14.8:14). The third pertained to **undrained passageways** in OF2 (145346) and OF4 (e.g., 03.6:36). The additional fourth breach pertained to Red Tractor and Arlagården only (not legislation). This concerned use of **electric shocks** to urge cows to leave the robotic

milker in some cases, as described by the farmer in OF2 (8.5:47). This does not appear aligned with Red Tractor requirement (2025b) AH.6.b that states "*No electric goads or electrified backing gates used*".
- Soilage of cow bodies in OF2 (e.g., 22.6:11); OF3 (e.g., 05.1:47), OF4 (e.g., 03.6:36), and OF6 (e.g., 13.6:17);
- Possible tail injury in OF2 (145153/6);
- Calf eye discharge in OF5 (IMG_2562);
- Sore red udder in OF4 (07.3:59);
- Poor BCSs (e.g., OF1, 07.3:30; OF2, 14.1:48; OF3, 05.1:47) and large udders (e.g., OF1, 07.3:30);
- Unsuitable cubicle sizes in OF4 (e.g., 07.3:59);
- Small calf pens in OF5 (e.g., IMG_2562);
- Redirected oral behaviours in OF5 (e.g., IMG_2571).

These points are all welfare concerns/indicators (DEFRA, 2024; EFSA, 2023).

There were also efforts to speak positively about, and to sanitise, certain aspects of dairy farming. For instance, cows were referred to as having a "two-month holiday" (OF6) in reference to the so-called "dry period" when the cows do not produce milk for roughly two months prior to calving again. However, this period is not accurately described as a break. For instance, the process of stopping the milking of a cow (known as "drying off") can be highly stressful and is a high-risk time for mastitis. The cow is also in the midst of another pregnancy (Vilar & Rajala-Schultz, 2020). Relatedly, the veterinarian at OF2 (8.7:32) was implying to visitors that the robotic milker can ease separation distress following mother/calf separation due to oxytocin release. However, oxytocin is released in non-robotic milking too. Significantly, while oxytocin is known to reduce stress, it also plays a key role in mother/calf bonding. Indeed, maintenance of mothers in a physiological maternal mode—through raising oxytocin levels multiple times everyday via milking stimulation—could foster a state of 'mothering deprivation' (Mandel & Nicol, 2017). Another example is the normalcy with which tube feeding (OF7) and disbudding (OF1, OF6) were spoken about.

Relatedly, some of the less palatable parts of dairy farming were not on display, such as mother/calf separation, tube feeding, use of a crush (bar OF2), ill cows, the act of disbudding, or the treatment/movement of severely lame cows. Some non-representative information seemed to be provided too, at least regarding OF1 (Farm 9) and timing of mother/calf separation. Mother and calf have two days together before separation, according to OF1 Open Day information. However, this did not seem reflected in the undercover footage from the same farm (see Table 4, and Table S9), or indeed from other farms.

Finally, the conversations with staff drew attention to further considerations and trends within modern dairy farming. For example, these concerned:
- Frequency of milking (OF5). Farms across the 15-farm sample of this report varied between milking their cows between two and three times daily (or on a voluntary basis if robotic milkers are used). The frequency could not be ascertained for some farms. There is no legislation on milking frequency, and it is rarely factored into welfare assurance schemes. OF5 comments that udder leaking is already occurring upon entering the parlour with twice daily milking, which could indicate overly full udders and discomfort for the cow. However, studies point to welfare trade-offs regarding milking frequency: more frequent milking may potentially confer more udder-related comfort, but it may increase lameness risk due to altered behavioural time budgets (Caixeta & Bicalho, 2011; EFSA, 2023b; Österman & Redbo, 2001). This relates to discussion of robotic milking advantages below.
- Calf-at-foot options (OF6). Whilst there are definite major welfare advantages of keeping mother and calf together for six months (whereby the calf shares the mother's milk with humans), it does not remove all welfare problems—even regarding the target major welfare problem of mother/calf separation. Generally, the

longer the mother/calf bond has the chance to develop, the stronger it will be, and the more challenging separation will be (EFSA, 2023a). *Without significant curtailments to dairy production and consumption*, such systems would also: 1) struggle to generate sufficient quantities of milk to meet demand, and 2) require sufficiently more resources.

- Drawbacks/advantages of robotic milkers (OF1, OF2, OF4). Welfare trade-offs are created; robotic milkers optimise cow agency and can reduce waiting/standing/queueing times (and thus potentially reduce lameness), but intermittent breakdowns can occur. More significantly, less dominant individuals may have access issues, and more individuals may be sent to slaughter for beef than would otherwise be the case simply due to atypical teat positioning that the robotic milker fails to recognise. OF2 also refers to rough handling (pushing and use of electric shocks) to force cows to enter (at least during training) and exit the milker. These points are reflected in the literature (e.g., Jacobs & Siegford, 2012; Kappel et al., 2026).
- Carbon-oriented pressures for separating calf and mother immediately, for calving young, and for zero-grazing (OF2, OF3). This echoes studies such as those by Mogensen et al. (2022) and Whalin et al. (2025).

Table 5. Open Day farm profiles.

Note: AG indicates Arlagården; MC indicates mother/calf. Additional sources to transcripts/footage: OF5 (Huyton, 2023; VetSalus, 2025) *and OF7* (DAERA, 2023)*. Also see Table 1 for further OF1 and OF2 sources. Herd sizes are approximate.*

	Name	County	Herd size	Zero-graze?	Milking type	Exemplar suppliers	Arla scheme	Visit date 2026	Farm in Tab. 1?	Main points
OF1	**Lower House**	Worces-tershire	120	N	Robotic	Not found	CARE	7th June	Y (Farm 9)	Illegal delay in ear tagging. Drawbacks of robotic milkers. Cleaner conditions. Overstating time before MC separation? 9,000 litre min. (13,000 cases).
OF2	**Longlands**	Derby-shire	230 to 400	Y	Robotic	Starbucks	360	7th June	Y (Farm 10)	Rough handling when cows enter/leave milkers. Carbon-related pressures for calving young. Illegal tail twisting evident and electric shock use, which appears to breach Red Tractor and Arlagården requirements.
OF3	**Bowers Hall**	Stafford-shire	340	Y	Herring-bone	Aldi	AG (infer)	7th June	N	MC separation after 1 day. More individualised treatment from zero grazing (Smaxtec exhibitor, they ear a bolus). Environmental reasons for MC separation, 10,000 litres.
OF4	**Great Wallaston**	Shrop-shire	70	N	Robotic	Not found	CARE	7th June	N	Lost 40 cows to the TB test. 10 yr age target. Robot drawback: breakdown once every two months at 3am (loose wire). Teat arousal. Cows come to be milked when want (what is their incentive beyond cake)? Teat-specific, no overmilking. Muckier than other OFs. Concerning if this is “best behaviour/ presentation”. Some poor BCSs, cubicles too small.
OF5	**Hare Appletree**	Lanca-shire	100	N	Herring-bone, 2x	Not found	CARE	7th June	N	Milked twice a day and can already be leaking milk when coming in. Redirected oral, small calf pens, calf runny eyes, some

										disbudding scars but not too bad. Hunting practiced on farmland (mainly for lamb protection).
OF6	**Norton Court**	Glouce-stershire	120	N	Herring-bone, 2x	Not found	CARE	7th June	N	Vegetarian has taken over from father. Intends to shift towards calf-at-foot (separate at six months) and organic. Lower input cows: 6,000 litres. Portrayal of dry period as "two month holiday". Admits average age of death or slaughter is eight versus potential of 25. Two days before MC separation. Mucky hinds of two cows in parlour.
OF7	**Wildon Grange**	N York-shire	950	Y	Rotary, 3x	Aldi, Morrisons	360	7th June	N	Largest herd size of all 15 farms. 40 litres, high input. Tube feed sounds routine.

2.8 Comparisons: Further extant literature & other investigations

The findings in this report are only new insofar as they relate to the particular farms sampled at the applicable particular points in time. Many similar illegality cases, label breaches, and significant welfare insults have been found in other undercover exposés of dairy cow farms in the UK (including Arla-supplying farms). In terms of illegality and label breaches exclusively, this has included as follows:

- Rough handling and excessive use of force was the main form of illegality found on a dairy farm in Essex. The included manipulation of sensitive body areas and forced movement of downer cows (including via hip hoist). A lack of head restraint when ear tagging, prolonged restraint time, uncaring attitudes, and slippery floors were also evident (Carbstrong, 2026).
- In 2025, Animal Justice Project reported repeating hitting to cows on a "mega" (2000+) zero-grazing Red Tractor and Arla-associated dairy cow farm in North Yorkshire (Animal Justice Project, 2025). This included use of various implements for hitting (e.g., electric goads, pipes, ropes). The charity also reported botched ear tagging, illegal prolonged solitary housing of calves, absent/improper storage of dead cows, walking expectations of severely lame cows, dirty conditions, and injuries.
- In 2023, two Red Tractor assured dairy cow farms, one in Wales and one in Kent, were investigated by *Viva!* (2023b, 2023a). Dangerous techniques for tube-feeding calves were reported along with rough handling (including hitting sensitive areas), gratuitous abuse, improper/absent storage of dead cows, inappropriate use of shackles, severely lame cows, unclean floors, swollen joints, and low BCSs.
- Between 2021 and 2022, using footage from three zero-grazing dairy farms—two Müller-associated farms in Dorset and Cheshire, and a Red Tractor and Arla-associated zero-grazing farm in Cornwall—*Viva!* (2023c) raised awareness about the conditions on the increasing number of zero-grazing farms in the UK and reported the illegal prolonged solitary housing of calves. This followed a conviction of a worker from the Cheshire farm regarding repeatedly hitting a cow with a spade (McIntyre, 2022).
- In 2022, Animal Equality investigated another Welsh dairy farm. They reported blatant gratuitous abuse, rough handling of sensitive body areas, untreated suffering, neglected cows, forced movement by hip hoist, and uncaring attitudes (Animal Equality, 2022). The footage subsequently formed part of a BBC Panorama episode on the true cost of milk (BBC, 2022).
- In a similar nationwide multi-farm investigation in 2019, Surge reported further cases of blatant and gratuitous abuse, rough handling involving sensitive body areas, general excessive use of force, improper/absent storage of dead cows, and uncaring attitudes on UK dairy farms, including RSPCA-Assured farms (Surge, 2019).
- In 2018, Animal Equality released undercover footage from an organic dairy farm in Somerset that supplied Waitrose (Animal Equality UK, 2018). They reported

dangerous techniques in use when tube-feeding calves, blatant and gratuitous abuse of calves, uncaring attitudes, inadequate water provision, general rough handling, and inappropriate use of shackles.
- In 2007, Animal Aid investigated four zero- or low-grazing dairy farms (Animal Aid, 2007). They reported improper/absent storage of dead cows, dirty conditions, untreated disease, and low BCSs.

There are yet further investigations pre 2007; however, 2007 is the chosen end point here for space limitation reasons and due to the current WOFA legislation coming into force in 2007. Due to the international reach of Arla, it is also worth stating that further cases have also been found abroad regarding Arla-supplying farms, such as in Sweden (Animal Rights Alliance, 2025). Again, similar problems were found. Sentencing (including of management in numerous cases) has often resulted in many of these instances, demonstrating the importance and authenticity of these investigations' findings. These investigations are further supported by highly similar findings from innumerous investigations concerning the farming of other animal species and for other animal products.

Novel forms of illegality and welfare concern are often uncovered in each investigation that are not commonly found elsewhere. For instance, in 2017, Animal Equality documented severe illegality in the form of cows being kept in individual hutches considerably past the eight week maximum time limit (Animal Equality UK, 2017). Similarly, in the present investigation, the dangerous intervention using enormous pliers applied to the eye region and the staff urinating at a place of work amongst the cows stand out as relatively unique among all the investigations. The illegality findings from aforementioned undercover investigations are complemented by The Food Standards Agency's own data collection on non-compliance found at the slaughterhouse—some of which can relate to cows' lives on the farm, including cattle arriving at the slaughterhouse heavily pregnant, immobile, with bruising/wounds, or already dead (Food Standards Agency, 2025). The citations in Table 4 highlight how other welfare concerns commonly exposed in the aforementioned investigations are also recognised within academic literature and government-commissioned reports.

This body of evidence points to much of the illegality being systemic; it is not due to one 'bad apple' (one farm or staff member), but widespread and recurring across UK dairy farms. This is particularly the case with rough handling, severe lameness, unsafe equipment use (crush and hip hoist), insufficient/unclean bedding, dangerous methods of tube feeding, insufficiently drained floors, and uncaring attitudes. Indeed, lameness is known to have a prevalence rate of roughly 30% (Afonso et al., 2020).

The body of evidence also points to how the tendency towards such illegality is known, foreseeable, and preventable. Indeed, multiple bodies, including the government's own advisors have affirmed that a majority of criminality on UK's animal farms goes unprosecuted, highlighting a deep enforcement problem (Animal Sentience Committee, 2025; The Animal Law Foundation & Animal Equality UK, 2022; The Animal Law Foundation, 2024, 2025). Supporting this is the fact that other staff were often observing the illegality/breaches without overt corrective action being taken. The government did commit to two enforcements steps in its Animal Welfare Strategy released in 2025 (DEFRA, 2025). However, it is feared this will move too slowly and do too little (e.g., a focus on making actions on all non-compliances uncovered transparent, but leaving concern regarding all non-compliances remaining unchecked).

One key weakness is the reactionary and risk-based nature of audits from not only a government legal perspective, but also in terms of farm assurance schemes—including Red Tractor and Arlagården—and claimed supermarket additional audits in some cases. Current audit systems often rely on complaints initially being made so as to flag a particular farm on

the system. Given that most farms are out of general public sight, in rurality, and with the most illegality-prone segments occurring behind walls or closed doors, this is wholly insufficient. In accordance with Arlagården's policies, even after farms have been flagged, they are still given 48 hours notice for a so-called 'spot check' (Arla Foods, 2024b). Relatedly, there is an overreliance on self-assessment of animal welfare metrics in Arlagården and Red Tractor. This could lead to flawed and deeply biased claims of glowing performances that do not seem to match the present findings of this report (Arla Foods, 2024b).

3 Summary

The primary phase of this project involved analysis of undercover footage from 10 Arla-affiliated dairy cow farms across England. A total of 359 cases of both illegality and Arlagården/RedTractor breaches were identified in addition to one extra breach unique to Arlagården/RedTractor—a total of 360 breaches. A majority of breaches pertained to rough handling of varying kinds, walking demands on severely lame cows, unsafe use of equipment (especially halter and hip hoist), undrained floors, and uncaring attitudes among staff. However, there were numerous other serious less frequent breaches that warrant attention. An additional 26 welfare problems lying outside of legislative and label provisions were encountered. The second project phase considered undercover footage, and transcripts of conversations, from seven farm Open Days. While conditions were generally cleaner, three illegality/label breaches and one extra label breach were still identified, along with a range of lingering welfare problems. This is concerning as the farms would presumably feel pressure on Open Days to be at their best. The illegality, label breaches, and welfare problems identified across both phases of this project extend the ever-growing catalogue of prior breaches and poor welfare identified in former investigations. This individual project alone points in the direction of systemic illegality and thus legislative enforcement problems; taken together with the collective evidence from other investigations and literature, the case becomes exceptionally strong indeed.

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Appendices

A. Legislation, code, & standards extracts

Legislation & code

According to the *Animal Welfare Act 2006*:

- "A person commits an offence if … (a) an act of his, or a failure of his to act, causes an animal to suffer, (b) he knew, or ought reasonably to have known, that the act, or failure to act, would have that effect or be likely to do so, (c) the animal is a protected animal, and (d) the suffering is unnecessary" (s. 4.1[2])
- "A person commits an offence if—(a) he is responsible for an animal, (b) an act, or failure to act, of another person causes the animal to suffer, (c) he permitted that to happen or failed to take such steps (whether by way of supervising the other person or otherwise) as were reasonable in all the circumstances to prevent that happening, and (d) the suffering is unnecessary" (s. 4.2)

[2] "Sch." refers to "Schedule" of legislation and "s." to section.

- “The considerations to which it is relevant to have regard when determining for the purposes of this section whether suffering is unnecessary include—(a)whether the suffering could reasonably have been avoided or reduced; (b)whether the conduct which caused the suffering was in compliance with any relevant enactment or any relevant provisions of a licence or code of practice issued under an enactment” (s. 4.3)
- “A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice” (s. 9.1)
- “For the purposes of this Act, an animal's needs shall be taken to include—(a) its need for a suitable environment, (b) its need for a suitable diet, (c) its need to be able to exhibit normal behaviour patterns, (d) any need it has to be housed with, or apart from, other animals, and (e) its need to be protected from pain, suffering, injury and disease” (s. 9.2)
- “The circumstances to which it is relevant to have regard when applying subsection (1) include, in particular—(a) any lawful purpose for which the animal is kept, and (b) any lawful activity undertaken in relation to the animal” (s. 9.3)
- “In any proceedings against a person for an offence under this Act … —(a) failure to comply with a relevant provision of a code of practice issued under this section may be relied upon as tending to establish liability, and (b) compliance with a relevant provision of such a code of practice may be relied upon as tending to negative liability” (s. 14.4)

According to *The Welfare of Farmed Animals (England) Regulations 2007*:

- “Animals must be cared for by a sufficient number of staff who possess the appropriate ability, knowledge and professional competence” (Sch. 1, s. 1)
- “Where any animals (other than poultry) are kept in a building they must be kept on, or have access at all times to, a lying area which either has well-maintained dry bedding or is well-drained” (Sch. 1, s. 4)
- “Any animals which appear to be ill or injured must be cared for appropriately and without delay; where they do not respond to such care, veterinary advice must be obtained as soon as possible” (Sch. 1, s. 5)
- “Where necessary, sick or injured animals must be isolated in suitable accommodation with, where appropriate, dry comfortable bedding” (Sch. 1, s. 6)
- “The freedom of movement of animals, having regard to their species and in accordance with good practice and scientific knowledge, must not be restricted in such a way as to cause them unnecessary suffering or injury” (Sch. 1, s. 9)
- “Materials used for the construction of accommodation, and in particular for the construction of pens, cages, stalls and equipment with which the animals may come into contact, must not be harmful to them and must be capable of being thoroughly cleaned and disinfected” (Sch. 1, s. 11)
- “Accommodation and fittings for securing animals must be constructed and maintained so that there are no sharp edges or protrusions likely to cause injury to them” (Sch. 1, s. 12)
- “Animals must not be provided with food or liquid that contains any substance that may cause them unnecessary suffering or injury and must be provided with food and liquid in a manner that does not cause them unnecessary suffering or injury” (Sch. 1, s. 23)
- “All animals must either have access to a suitable water supply and be provided with an adequate supply of fresh drinking water each day, or be able to satisfy their fluid intake needs by other means” (Sch. 1, s. 25)
- “Feeding and watering equipment must be designed, constructed, placed and maintained so that contamination of food or water and the harmful effects of competition between animals are minimised” (Sch. 1, s. 26)
- “Housing, stalls, pens, equipment and utensils used for calves must be properly cleaned and disinfected as often as necessary to prevent cross-infection and the build-up of disease-carrying organisms” (Sch. 6, s. 6.1)
- “Where calves are kept in a building, floors must … be designed, constructed and maintained so as not to cause injury or suffering to calves standing or lying on them” (Sch. 6, s. 7b)
- “All calves must be provided with appropriate bedding. All calves must be kept on, or at all times have access to, a lying area which is clean, comfortable and adequately drained and which does not adversely affect the calves. All housed calves and calves kept in hutches or temporary structures must be kept on, or at all times have access to, a lying area which is well-maintained with dry bedding” (Sch. 6, s. 8)

- “All calves must be fed at least twice a day” (Sch. 6, s. 12.1)

According to *The Animal By-Products (Enforcement) (England) Regulations 2013:*

- “The body or part of a body of any farmed animal that has not been slaughtered for human consumption must be held by an operator, pending consignment or disposal, in such manner as to ensure that no animal or bird will have access to it” (s. 4.3)

According to *The Cattle Identification Regulations 2007:*

- “[I]n the case of a dairy herd, the keeper must apply one ear tag to the calf within 36 hours of birth and the second tag within 20 days of birth” (Sch. 1, s. 1.3a).

Section 14.4 of the *Animal Welfare Act 2006* clarifies the legal weight of the Code of Practice for the Welfare of Cattle (2024), which is further supported by other explanatory notes by DEFRA (DEFRA, 2024b). Within this Code, the following is stipulated[3]:

- “[R]ecommendations … apply to all ages and types of cattle” (pt. 2).
- “In general, the larger the size or the productivity of the herd, the more skill and care is needed to protect welfare. No changes should be made to husbandry, equipment or production until the possible effects on animal welfare have been considered” (pt. 5).
- “Those responsible for farm management should make sure that the cattle are cared for by enough well-motivated and competent staff” (pt. 8).
- “These staff need to be aware of the welfare needs of cattle and be capable of protecting them from all expected problems before they are given any responsibility” (pt. 8).
- “… If they are expected to perform specific tasks on-farm, such as foot trimming, then appropriate training should be given. Otherwise, a veterinary surgeon or, for certain tasks, a competent and trained contractor will be required” (pt. 9).
- “…Careful supervision and handling of the animals will reduce their fear” (pt. 10).
- “The health and welfare of animals depends on them being regularly inspected. All stock-keepers should be familiar with the normal behaviour of cattle and should watch for any signs of distress or disease. To do this, it is important that stock-keepers have enough time to:
- inspect the stock; check equipment; take action to deal with any problem” (pt. 11).
- “The stock-keeper should be aware of the signs of ill-health in cattle, which include: listlessness; separation from the group; unusual behaviour; loss of body condition; loss of appetite; a sudden fall in milk yield; constipation; scouring (diarrhoea); not cudding; any discharge from the nostrils or eyes; producing more saliva than usual; persistent coughing; rapid or irregular breathing; abnormal resting behaviour; swollen joints; lameness; mastitis” (pt. 12).
- “You should be able to anticipate problems or recognise them in their earliest stages. In many cases, you should be able to identify the cause and put matters right immediately. You should always consider the possibility that cattle may be affected by a notifiable disease (see paragraphs 37 to 38). If the cause is not obvious, or if your immediate action is not effective, a veterinary surgeon or other expert should be called in immediately – failure to do so may cause unnecessary suffering” (pt. 13).
- “Cattle should be moved at their own pace, without being hurried by stock-keepers. You should encourage them gently—especially around corners and where it is slippery underfoot. You should avoid using too much noise, excitement or force. You must not put pressure or strike at any particularly sensitive part of the body (such as the head or udder). Anything that you use to guide the animals (such as a stick) should only be used for that purpose and must not have a sharp or pointed end. If goads are used, you should always ensure that there is sufficient space for them to move forward” (pt. 14).
- “You should make sure that any concrete floors and walkways have a non-slip surface” (pt. 15).
- “All stock-keepers should have access to easy-to-use and efficient handling pens (the right size and scale for the type and number of animals in the herd). This is so that you can routinely manage and treat the animals, and make sure that they are quietly and firmly handled. Ideally, these handling pens should protect the animals from extreme weather. You should keep all pens, races (narrow passageways), crushes (restraining gates to assist handling) and floors in good condition and make sure that they are free from any sharp edges

[3] “pt.” refers to “point”.

or projections which might injure cattle" (pt. 16).

- "[E]ar tags should be fitted by a properly trained and competent operator, so that the animal does not suffer any unnecessary pain or distress - either when the tags are fitted or later" (pt. 18).
- "When fitting ear tags, you must properly restrain the animals" (pt. 19).
- "Maintenance of good health is the most basic requirement affecting the welfare of cattle. Measures to protect health include good hygiene, good husbandry and effective ventilation" (pt. 23).
- "Biosecurity means reducing the risk of disease occurring or spreading to other animals. Good biosecurity can be obtained through: good management/husbandry; good hygiene; reducing stress on the herd; effective disease control systems" (pt. 28).
- "Lameness in any animal is usually a sign that they are in pain. Lameness in cattle is a sign of ill-health and discomfort. It clearly affects animals' welfare, as well as their performance and production. For this reason, very lame cows should be taken off concrete and housed in a suitably bedded pen. If a significant percentage of your cattle has severe lameness, this can be a sign of poor overall welfare standards within the herd" (pt. 31).
- "Also, you must not transport any cattle off-farm that cannot stand up unaided or cannot bear their weight on all four legs when standing or walking. You should not take any cattle that can bear weight on all four feet but are slightly lame to market or anywhere else if it is likely to aggravate the injury, however slightly" (pt. 33).
- "You should take action immediately if any cattle are injured or appear ill or distressed. It is important to exclude the possibility of notifiable diseases. If you are in any doubt about the ill-health or the most effective treatment, consult your veterinary surgeon without delay. Likewise, if an animal you have treated does not respond to treatment, seek your veterinary surgeon's advice" (pt. 39).
- "No matter how long you house the animals, their accommodation should give them shelter and enough room to move around and interact with each other. The accommodation should provide enough space for a subordinate animal to move away from a dominant one. It is important to provide as comfortable an area as possible, so that the animals can lie down for as long as they want and have enough space to stand up again" (pt. 57).
- "On the other hand, the yards and passageways must not be worn smooth, as the animals are then likely to slip and possibly cause leg and other damage. You should not let slurry build up on concrete floors and passageways, as this will also make the floor slippery" (pt. 58).
- "Ideally, for dairy herds you should completely clean out straw yards every four to six weeks. This is so that the cows do not get too dirty and to reduce the risk of mastitis from bacteria in the bedding (i.e. environmental mastitis). If you use straw yards, you should top them up with clean, dry straw every day" (pt. 62).
- "You will need to control the build-up of slurry in passageways and loafing areas by scraping at least twice a day" (pt. 63).
- "Cubicles should be designed to encourage cows to lie down and stand up easily without injuring themselves. You need to have enough bedding to: keep the cows comfortable; prevent them from getting contact or pressure sores (from always lying in the same or cramped positions); keep the cows' teats, udders and flanks clean" (pt. 66).
- "It is important that you keep slurry to a minimum, either by scraping out the passageways at least twice a day or by using slatted passageways. You should clean the cubicle base each day and replace the bedding as necessary, to keep the lying area clear of manure" (pt. 68).
- "You should always provide adequate supervision at calving, whilst ensuring that calving cows should not be disturbed, unless there are indications that the birth process is not proceeding normally. Enough space should be available to allow cows to exhibit their normal behaviour at calving" (pt. 91).
- "If you help in the delivery, good hygiene of both yourself and the equipment, is essential. You should clean and disinfect calving aids and ropes after each time you use them. You should only use calving aids to help with a delivery, not to extract the calf as quickly as possible" (pt. 94).
- "[C]olostrum should be given by a suitably trained person using a stomach tube" (pt. 103).
- "…you should make sure that the environment does not stress the calves" (pt. 109).
- "Housed calves need an environment that is: dry; well drained; well bedded; well ventilated; draught free" (pt. 111).
- "You should regularly inspect the feet of all cattle – including bulls – and trim them when

necessary. A foot-care programme for your herd should be part of your farm's written health and welfare plan. Foot trimming is of value for all cattle, not just for cows that are lame. You should not attempt foot trimming unless you are properly trained and you have restraining facilities for the animals. This is because poor foot trimming can cause lameness. If you are in any doubt, get advice from a veterinary surgeon" (pt. 125).

The DEFRA (2022; pt. 19) guidance on ear tagging also states: "You should … secure the animal's head to prevent jerking during tagging".

Assurance scheme standards

Red Tractor (2025a):

- "These Rules are in addition to any statutory requirements. Nothing in these Rules shall be deemed to provide exemption from current legislation and you must comply with all legislation relevant to the scope of the Scheme at all times" (pt. 6).

Red Tractor (2025b):

- "Artificially reared youngstock must be provided with unrestricted access to clean fresh drinking water at all times from birth" (CR.3).
- "It is not permitted to … strike or kick any animal; apply pressure to any particularly sensitive part of the body in such a way as to cause pain or suffering; lift or drag in any way that may cause pain or suffering; use prods or other implements with pointed ends; twist, crush or break the tails of animals or grasp the eyes of any animal; throw or drop animals" (Appendix of AH.6).
- "No electric goads or electrified backing gates used" (AH.6.b).
- "Dogs kept under control" (AH.6.c).

Arlagården (Arla Foods, 2024b):

- "In addition to compliance with all applicable national legislation in our owner countries, as well as EU legislation, owners also comply with the following well established industry audit standards: UK—Red Tractor" (p. 4).

Arla 360 and Arla CARE: None publicly available and none provided on request at the time of writing.

B. Supplementary data

Supplementary data for each farm can be found here.

ARLArming: Nationwide Arla Farm Investigation

Supporting Data: Individual Farms



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Authorship

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Cover image: an image from the footage that this report is based on.

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RESEARCH SERVICES

This supplementary material complements the main report, which can be found here.

The main report should be consulted for the precise parts of legislation, code, or label standards that have been breached. Additionally, any citations in this document are referenced in the main report.

The report in its entirety was commissioned by Animal Justice Project.

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Universal note for all supplementary tables for Farms 1 to 10

The severity label is based on expert judgement in consideration of extent of any potential breach in addition to the *degree* to which the health and welfare of cows are definitively negatively impacted in the present, the *duration* of potential harm, and *how many* cows are affected. Illegality or welfare problems categorised as low severity, while still serious, is either less of an immediate threat to live sentient animals documented in the footage, is not very widespread, or it is not to an extreme extent. It is important to note that the severity labels do not concern how clearcut the case for illegality is, but rather exclusive considerations of welfare impact. See Table 3 and Box 2 in the main report for the specific legislation, code, or label standards breached, as well as for details on the conservative approach taken. Timestamps are always in minutes:seconds. They are preceded by an abbreviation of the video group for the particular farm concerned (e.g., LWC refers to Littlewood “Calves”). Any obviously repeated scenes across different video groups were excluded. The reasons for combining Red Tractor and Arlagården have been outlined in the main report (Box 1). The following abbreviations are used: leg for legislation, RT for Red Tractor, AG for Arlagården, art for artificial, grat for gratuitous, NRH for no head restraint, H for hearsay, and MC for mother/calf. Breaches are highlighted in red.

Farm 1: Littlewood Farm (Dorset)

Table S1. The eight categories of illegality, eight categories of label breaches, and four categories of other welfare problem evident at Littlewood Farm.

Note: This farm is part of Arla's standard Arlagården scheme. See further instructions for understanding the table at the top of the file.

Video file / timestamps	Welfare problem	Description of welfare problem	Severity	Leg / Code	RT / AG
LWC: 02:48	Dangerous intervention	Huge pliers used on eye problem. Very dangerous: any sudden eye movement could create more serious eye injury (and flinching is observed). Warrants either only use of hands or veterinary involvement and sedation.	Severe	Y	Y
LWCS: 0:24 (barking dog), 1:09 (lunging dog on lead taken up to cow); 0:45, 04:00 (human chase)	Intimidation tactics (incl. dog), hurrying, noise, uncaring	Cow fearfully reacts to barking dog (on lead, on vehicle carrying calf). Possible to separate mother/calf without causing additional stress via intimidation tactics (via dogs or human chasing).	Severe	Y	Y
LWC: 0:07 (race), 0:44 (crush)	Prolonged restraint	Young cow kept in crush race for 20+ mins, then in crush itself for over 1 hr. Other cows bother her (1:10), escape attempts (1:16, 1:23, 2:00), drooling (2:10)	Severe	Y	Y
LWC: 0:07 (race), 0:44 (crush)	Neglect	In the above prolonged restraint examples, the staff leave the restrained cow alone for an extended period of time.	Severe	Y	Y
LWCS: 01:37, 2:44 (hit of anal region); LWC: 0:30 (tail), 0:44 (nostrils); LWL: 00:58 (udder, med); LWRH: 00:12-2:22 (x~11, tail); LWRH: 2:07 (x7 same udder), 2:39 (x2, same udder), 2:54 (face kick attempt)	Rough handling: sensitive area	Forceful hits or manipulation of sensitive body areas spanning face, anal region, tail (twists or pulls), nostrils, or udder smacks. Typically performed when wanting the cow to do something expediently, often with no force-free methods first attempted (e.g., during separation of mother/calf, to restrain cow, when entering crush, or tight positioning in the parlour).	Severe	Y	Y

LWRH: 2:50 (hits legs with hose, cow kicks & worker hits harder), 3:00 (quad bike skims backs of cow's legs); LWRH: 1:07, 1:15, 1:26 food spit reaction, 2:28, 2:45 slips after (slaps), 1:40 (punch); LWC: 00:30	Rough handling: general	General excessive use of force or with implement (e.g., during separation of mother/calf, to restrain cow, when entering crush, when urging cows to move or stand, or tight positioning in the parlour).	Severe	Y	Y more explicit
LWCS: 0:07, 1:48, 2:28 (two areas); LWC: 00:26	Undrained floors	Could become slippery and could fester disease-causing organisms. Should be cleaned at least twice a day. Moderate risk given vulnerable condition of dairy cows.	Moderate	Y	Y
LWRH: 00:47, 2:54	Uncaring attitude	Shouting/swearing at cows. All other illegality/breaches demonstrate uncaring attitudes too.	Moderate	Y	Y
LWCS: All	Mother/calf separation	Depicts one single prolonged case of cow-calf separation. Cow wants contact with calf (0:07-0.44), doesn't wish to leave, seeks calf when out of parlour (4:45). Age of calf unclear. Unknown if been with cow for 12 hrs, or if cannot suckle.	Severe	X	X
All	Large udders	Can impede walking and comfort. Indicates high volumes of milk production, impacting on bodily reserves for restorative purposes.	Severe	X	X
LWC: 01:17	Poor BCS	High milk production can use up more energy than cows can replenish, or disease can cause poor BCS. Cows may experience fatigue, malnutrition, and negative impacts on the adequate functioning of other bodily systems.	Moderate	X	X
LWL: 0:07-1:02 (S2); 1:52-2:58 (four cows repeatedly lifting legs)	Lameness	Visible indicators of pain or discomfort. We would need to know more before being able to classify as illegal or a breach.	Moderate	X	X

Farm 2: Marsh Farm (Dorset)

Table S2. The eight categories of illegality, eight categories of label breaches, and nine categories of other welfare problem evident at Marsh Farm.

Note: This farm is part of Arla's standard Arlagården scheme. See further instructions for understanding the table at the top of the file.

Timestamp	Welfare problem	Description	Severity	Leg / Code	RT / AG
MC: 0:06 (into barrow), 0:15 (tip into pen), 2:26 (poor carry), 2:42 (into trailer), 3:50 (to art teat), 4:05 (grat), 4:12 & 4:16 (out of way); MLCS: 0:27 (into barrow)	Rough handling: calves	Dragging, pushing, shoving calves (to relocate or move them out of way)	Severe	Y	Y
MC: 0:40 (lying), 1:26, 1:56 (lying)	Dangerous tube feeding	Rough handling, forcefully pushing tube down, lying calves, no measuring, calf struggles	Severe	Y	Y
MC: 00:22	Ear tagging: NHR	No head restraint or restraint of any kind	Severe	Y	Y
MDCS: 6:54, 8:01 (day 2), 9:05 (night 3)	Dead calf not in dead bin	Dead calf left in wheelbarrow for at least three nights	Severe	Y	Y
MDCS: 0:25, 6:14, 6:31, 7:09 (no weight at all), 7:26 (v sore walk), 7:38 (slip), 8:08 [all same cow, score 3]; MHC: 1:39; 1:57, 2:20, 2:35 [same cow] {shackles}	Lameness (score 3)	Should be resting in separate pen and not made to walk to parlour if score 3. Abusing appropriate use of shackles.	Severe	Y	Y
MC: 3:35, 3:44, 4:00, 4:14, 4:20, 4:24	Force-feeding from art teats	Encouragement may be needed early on, but should be more gently executed	Severe	Y	Y
MC: 4:24 (swear); MDCS: 6:05 (chases lame mother cow)	Uncaring attitudes	Swearing at & chasing lame cow	Moderate	Y	Y
MDCS: 7:38	Undrained floor	Could become slippery and could fester disease-causing organisms. Should be cleaned at least twice a day. Moderate risk given vulnerable condition of dairy cows, especially lame cows.	Moderate	Y	Y
MC: 00:22	Ear tagging:	Pain, risk of infection or injury	Severe	X	X

	general				
MC: 4:36-5:13 (conspecific ear), 5:14, 5:22, 5:33, 6:04-6:22, 6:24, 6:37(cross-sucking)	Abnormal behaviours	Re-directed calf oral behaviours	Severe	X	X
MDCS: 0:07-6:03 (dead calf, many bellows, much pacing, placed in small enclosure); MLCS: 0:31 (mother ushered away), 1:05-2:07 (kept in micro pen, pacing/seeking), 4:45 (shaky calf), 4:57-5:12 (stranger cow/calf call & response)	Mother/calf separation	Signs of distress following mother-calf separation.	Severe	X	X
MDCS: 0:56; MHC: 2:00, 2:48; MLCS: 6:00	Poor BCS	High milk production can use up more energy than cows can replenish, or disease can cause poor BCS. Cows may experience fatigue, malnutrition, and negative impacts on the adequate functioning of other bodily systems.	Severe	X	X
MC: 3:06	Injury risk in trailer	Insufficiently securing calf in trailer for driving	Moderate	X	X
MC: 4:22 (messy hind), 6:30 & 6:36 (soiled bodies); MHC: 2:54; MLCS: 7:03	Diarrhoea	Signs of diarrhoea	Moderate	X	X
MC: 6:30, 6:36	Soiled bodies	Indicates unclean and wet conditions.	Moderate	X	X
01:35	Lameness (score 2 or less)	Welfare concern but unknown if receiving treatment and being monitored. Not walking alone.	Moderate	X	X
MHC: 2:07	Leg lesions?	Likely pain and discomfort.	Moderate	X	X

Farm 3: Leigh Court Farm (Gloucestershire)

Table S3. The 11 categories of illegality, 12 categories of label breaches, and 16 categories of other welfare problem evident at Leigh Court Farm.

Note: This farm is part of Arla's standard Arlagården scheme. See instructions for understanding the table at the top of the file.

Timestamp	Welfare problem		Description	Severity	Leg / Code	RT / AG
LCWB2: 0:04, 3:23, 4:31, 5:16-6:47, 9:06, 10:45 (same cow)	Misuse of hip hoist	Unsafe use of equipment	Hip hoist is intended for helping a cow to stand who can still independently bear weight—not for relocating or turning her. Staff should instead use a portable milker if downer cow needs to be milked. Staff should instead manually roll cow to regularly change cow's position. Footage pertains to same cow over two days. Cow is moved between different pen areas using hip harness, often with face/neck dragging along the floor (e.g., 4:31, 5:16). Cow is often lifted very high with all limbs off the floor in an almost vertical line (e.g., 9:42). At 10:58, the cow's head is very close to tractor wheels (particularly dangerous). Girth strap is only used with hip hoist once at 8:14).	Severe	Y	Y
LCWB2: 4:14, 7:32, 10:25 (same cow)	Misuse of halter		Halter should be used to support head and help direct movement—not as a means of moving a cow.			
LCWB2: 0:41	Misuse of shackles		Cow should be hospitalised in own pen if shackles are required to prevent further injury	Severe	Y	Y
LCCC: 01:40, 1:58, 2:05 (calves); LCC2: 0:01, 0:40, 0:59 (calves); LCWB: 0:12 (adult); LCWB2: 7:10 (downer cow)	Soiled bedding		Calves: Straw bedding is very dark in colour relative to that at perimeter, indicating it is very wet/soiled. This is both the case in the "run" and within their hutches, so there is no dry space. Adult: soiled bedding and soiled body.	Severe	Y	Y
LCWB: 0:13/1:30,	Lameness		No weight on back leg, looks infected or swollen. LCWB cases still go to parlour.	Severe	Y	Y

1:48/2:10; LCWB2: 0:04, 0:35, 0:55 (and all hip hoisting examples)		Should be isolated and milked on site. LCWB2 case should be hospitalised in own pen.			
LCWB: 2:45	Overgrown hooves	Can cause pain, discomfort, and lead to lameness. Conversely, over-trimming is also a welfare problem. It is not possible to detect this from the footage.	Severe	Y	Y
LCWB2: 1:02, 1:54, 2:12 (kneeing, slapping downer cow); 3:59, 10:00 (hurrying cows via slaps to move)	Rough handling: adults	Excessive use of force when trying to force cows to move—very vulnerable cows in the downer cow case.	Severe	Y	Y
LCRH: 0:14 (shove); LCC2: 3:49; LCWB2: 1:20, 2:23, 3:10	Rough handling: calves	First example concerns a newly separated calf shoved to floor. The second example concerns an escapee being roughly handled (pushed, shoved, tail manipulation) to get back into pen. The third example concerns pushing/shoving calves out of pen.	Severe	Y	Y
LCC2: 0:53	Contaminated water	Water provided needs to be fresh and clean.	Severe	Y	Y
LCRH: 1:25 (art teat)	Force-feeding from art teats	Encouragement may be needed early on, but should be more gently executed	Moderate	Y	Y
LCWB: 2:45	Insufficient cubicle bedding	Can cause discomfort and eventually pain if leads to pressure sores or lameness.	Moderate	Y	Y
LCC2: 2:55	Uncaring attitudes	Worker looking at phone whilst holding calf's mouth.	Moderate	Y	Y
LCCC: 0:30	Inadequate water	Water not permanently available to calf	Severe	X	Y
LCCC: 0:30; LCC2: 1:21	Inadequate feed	Calf wants more feed than is available	Severe	X	X
LCCC: 0:04; LCRH: 0:30 (bellows, esc. att.); LCC2 (all)	Use of calf hutches (up to eight weeks)	Environment of limited space and low complexity with no enrichment aside from bedding and seeing conspecifics.	Severe	X	X
LCCC: 1:58, 2:05;	Soiled bodies	Soiled bodies further indicate the soiled bedding. (LCWB: 0:12 no longer present	Severe	X	X

LCWB: 0:12; LCC2: 0:24 (belly), 3:21 (tail)		at parlour at 1:35, must have been cleaned)			
LCC2: 1:09, 1:17	Alopecia on calf hind area	Bald patches of skin further indicate lying on soiled bedding.	Severe	X	X
LCD: 0:17, 1:20	Dead calves	High mortality rate to have witnessed mortalities during investigation.	Severe	X	X
LCWB: 1:48	Poor BCS	High milk production can use up more energy than cows can replenish, or disease can cause poor BCS. Cows may experience fatigue, malnutrition, and negative impacts on the adequate functioning of other bodily systems.	Severe	X	X
LCC2: 3:08 (from single calf hutch), 3:50 (from crate transport transport)	Escape attempts	An indicator distress and poor welfare. The calves wish to seek a better environment.	Severe	X	X
All of LCC2	Vocalisations	Some sound quite high-pitched, which could represent distress.	Severe	X	X
LCC2: 0:30 (calf at back)	Redirected oral behaviours	Stereotypical, redirected oral behaviours: repetitive bar licking.	Severe	X	X
LCC2: 3:39	Very weak calf	Possible illness	Severe	X	X
LCWB2: 0:01	Large udders	Can impede walking and comfort. Indicates high volumes of milk production, impacting on bodily reserves for restorative purposes.	Severe	X	X
LCWB2: 3:54, 7:08, 9:57, 11:27	Lateral recumbency	Cows lying fully on their side is an urgent health risk; they should be turned into a sternal recumbent position. Concerns heightened by laboured breathing detailed below and physical struggle (leg paddling) at 7:17.	Severe	X	X
LCWB2: 7:11	Laboured breathing	Can be a sign of distress.	Severe	X	X
LCWB2: 7:17, 11:27	Inadequate water provision for downer cows	On two consecutive nights, water provided to downer cow is knocked over.	Severe	X	X
LCWB2: 1:20 (x2), 2:23 (x2), 3:10	MC separation	Adult cows follow staff taking calves away. Repeated attempts to gain access to calf by adult cows demonstrates strong motivation. Strong vocalisations too.	Severe	X	X
LCWB2: 8:00	Gastric tube use in downer cow	Stress and discomfort in an already vulnerable cow. Possibly for fluids, relief of bloat, or some form of test.	Moderate	X	X

Farm 4: Kingston Hill Farm (Oxfordshire)

Table S4. The five categories of illegality, five categories of label breaches, and two categories of other welfare problem evident at Kingston Hill Farm.

Note: This farm is part of Arla's standard Arlagården scheme. See instructions for understanding the table at the top of the file.

Timestamp	Welfare problem	Description	Severity	Leg / Code	RT / AG
KHL: 0.16, 0:20, 0:35, 0:59 (L1); 1:15, 2:14, 2:21, 2:39, 3:10, 3:30, 3:42 (L2); 4:03, 4:19 (L3); 4:50, 5:00, 5:26 (L4); 5:39, 5:59, (L5); 6:15 (L6); 6:24, 6:53, 7:07 (L7)	Lameness: severely lame cows made to walk	Lame cows, across two days. L1 & L2 alternating back leg lifts. AHDB Score 3. Can identify limb, very slow pace, often alone, head bobbing. Should be isolated and not made to walk. Indicates considerable pain. L3 milder case, odd gait, back leg stretches out slightly, worker lightly hits. L4 & L5 also slightly milder, but still definitive. L6 both back feet. L7 separated, housed with younger cows? Undrained pen—should be bedded. Skin lesion connected to increased lying? Drags back foot.	Severe	Y	Y
KHRH: 0:07	Rough handling: sensitive areas	Tail twisting or pulling	Severe	Y	Y
KHL: 1:59, 4:34, 5:14 (light prods of lame cow); KHRH: 0:21 (pipe hits)	Rough handling: excessive force	Cows often have no space ahead of them, are already moving, or the desired direction is unclear.	Moderate to severe	Y	Y
KHL: 1:39	Uncaring attitudes	Shouting, swearing	Moderate	Y	Y
KHL: 0:23, 0:47, 1:38, 4:02, 6:53	Undrained floor	Could become slippery and could fester disease-causing organisms. Should be cleaned at least twice a day. Moderate risk given vulnerable condition of dairy cows.	Moderate	Y	Y
LHL: 1:30, 4:55, 6:43	Poor BCS	High milk production can use up more energy than cows can replenish, or disease can cause poor BCS. Cows may experience fatigue, malnutrition, and negative impacts on the adequate functioning of other bodily systems.	Moderate	X	X
KHL: 7:00	Skin lesion	Skin lesion, potentially connected to increased lying	Modera	X	X

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Farm 5: Church Farm (CARE, Bedfordshire)

Table S5. The six categories of illegality, six categories of label breaches, and two categories of other welfare problem evident at Church Farm.

Note: This is an Arla CARE farm. Breaches specific to Arla CARE remain unknown due to the absence of publicly available welfare criteria—other than requiring grazing for a certain period of time (Arla Foods, 2026). This information has been requested from Arla Foods, both via email and phone on multiple occasions, but this information has not been provided at the time of writing. Thus, Red Tractor and Arlagården standards have continued to be focused on for this farm. See instructions for understanding the table at the top of the file.

Timestamp	Welfare problem	Description	Severity	Leg / Code	RT / AG
CRH: 1:45, 2:35, 4:00	Rough handling: other hits	All in crush. Often to get in or after falling	Severe	Y	Y
CRH: 2:20, 2:30, 2:55, 3:05, 3:27, 3:58 (face); 2:05 (neck/spine); 0:10, 0:21, 0:24, 0:41, 0:59, 1:02, 1:04, 1:12 (udder slaps/ manipulation)	Rough handling: sensitive areas	Face, & neck/spine all in crush. Should use boards on side to guide cow movement. Often to get in or after falling. Udder slaps (l to m) mainly in parlour with no space ahead to move. Multiple hits.	Severe	Y	Y
CL (approx. 10 cases): Odd gait/limp: 0:12, 0:28, 0:52, 1:17, 1:51 [same cow]; 3:26; 4:30, 4:48 [same cow]; 5:42, 6:00, 6:15 [same cow]; 7:03, 7:32 [same cow]; 7:53(in/out swirl), 8:06, 8:13 [same cow]; 8:39, 9:02; 9:48; 11:43; 12:33; 13:20	Lameness Sc 2-3	Indicates discomfort and pain, and limits highly motivated behaviours, impairing quality of life. Should be resting in separate pen and not made to walk to parlour if score 3.	Severe	Y	Y
CC: 3:38, 5:01, 6:01 [knee fall, same cow]; 7:15, 8:54 [knee fall, same cow]; 10:01 (head wedged in crush); 2:07 (injury: 3:06 blood dripping; 3:16 close-up of cut, also limping)	Unsafe use of equipment	Reoccuring knee fall: in crush when lifting back leg for wash. Should use belly straps. Trapped head: workers do not respond to bellows at CC: 10:19, 10:33, 10:45, 10:59, 11:34. Hefty struggle/breath at 10:44. Injury: upon leaving crush, reportedly from injection.	Severe	Y	Y
CS: 0:12, 0:24, 0:37, 0:47, 1:00, 1:17, 1:46, 1:58, 2:15, more sand required? (2:28)	Sores	Pressure sores/blisters? More bedding required, more space, more cleaning	Moderate	Y	Y
CL: 1:06	Undrained	Could become slippery and could fester disease-causing	Modera	Y	Y

	floor	organisms. Should be cleaned at least twice a day. Moderate risk given vulnerable condition of dairy cows.	te		
CL: 11:43	Poor BCS	High milk production can use up more energy than cows can replenish, or disease can cause poor BCS. Cows may experience fatigue, malnutrition, and negative impacts on the adequate functioning of other bodily systems.	Severe	X	X
CC:1:15; 4:53, 5:54, 6:35[same cow]; 7:20; 9:58;	Stress of restraint	Demonstrated by escape attempts and resistance struggling.	Severe	X	X

Farm 6: Longlands Farm 1 (Dorset)

Table S6: The 16 categories of illegality, 16 categories of label breaches, and eight categories of other welfare problem evident at Longlands Farm 1 (as distinct from Longlands Farm 2 in Derbyshire).

*Note: This is an Arla 360 farm. In the absence of authoritative publicly available Arla 360 welfare standards, Red Tractor and Arlagården standards have continued to be focused on for this farm. instructions for understanding the table at the top of the file. *unless the hens are RT-certified (BI.13; Red Tractor, 2025b, p. 53).*

Timestamp	Welfare problem	Description	Severity	Leg / Code	RT / AG
LLC: 00:09, 0:30, 0:44 (cry/fall), 1:06, 1:35 (cry/fall); LLMC3: 07:13; LLMC1: 01:15	Ear tagging: NHR	Avoidable pain/distress evident from cries and falls.	Severe	Y	Y
LLWT: 00:12	Ill cow, lack of isolation	Teeth grinding, difficulty eating, excessive saliva, low BCS, potential swelling under jaw, body heaves: possible symptoms of pain and disease. Staff go by her—should notice. Ill cows should be isolated.	Severe	Y	Y
LLL: 02:55	Improper use of equipment	Shackled (walking) cows	Severe	Y	Y
LLC: 6:33, 7:30	Neglect	No action taken to remove small barking dog from two pens who presumably fits through pen bars. Bigger dogs are in passageway b/w pens. Calves are cornered in their own pen, backing away, flinching. Gratuitous.	Severe	Y	Y more expl

					.
LLC: 00:41, 01:53, 02:04, 3:39, 3:46; LLMC1: 02:27; LLMC3: 00:59, 1:39, 2:20; LLMC3: 08:20, 9:04, 9:50	Rough handling: calves	Pushing/dragging/shoving calves (across barn/passageways, into trailer/pens, or to examine)	Severe	Y	Y
LLRH: 01:35 (neck), 1:40 (spine) [same cow], 2:37 (neck), 2:45 (spine base); LLRH: 00:13, 0:22, 0:53 (tail); LLL: 02:10 (anal region, potentially lame)	Rough handling: sensitive areas	Neck/spine: Bashing/squishing lever onto neck/spine multiple times to encourage into parlour (no avail): cow flinches LLRH: 1:45, 2:50. Tail twisting/pulling and prodding of anal region.	Severe	Y	Y
LLC: 04:13	Improper tube feeding: endangering calves	Improper tube feeding technique: calf laying down, no checks for correct placement.	Severe	Y	Y
LLL: 00:10, 0:50, 1:07, 1:23, 1:40 (same cow)	Lameness	Limping cow, front & back limbs, limited weight on right back foot	Severe	Y	Y
LLC: 04:09	Feeding suboptimalities	Reasonable interpretation of being fed twice per day not met (e.g., 8am then gone 7am). Routine tube feeding versus only in cases of disease protection or colostrum inadequacies.	Severe	Y (H)	Y (H)
LLMC2: 08:08	Early ear tag	Ear tagging at six minutes of age interrupts crucial mother-calf interactions immediately post birth. This calf was being groomed by mother (licked clean) when worker interrupted.	Severe	Y (H)	Y (H)
LLRH: 00:23(chase); shout/swear 3:00, 3:45, 4:38, 6:02; LLC: 5:00, 5:36	Intimidation/ uncaring attitude	Chasing, shouting	Moderate	Y	Y
LLMC2: 06:18	Birthing disturbance (hurrying)	Worker pulled calf out during birth	Moderate	Y	Y
LLC: 05:00 (when forcing to art teat feed)	Rough handling: calves resisting	Tonic immobility (going completely limp) to resist movement in times of considerable stress	Moderate	Y	Y
LLMC2: 07:30 (new mother); LLRH: 03:00, 5:11 (whacks); 3:24, 3:40 (kicks); 3:45 gate trap	Rough handling: manual hitting	General hitting of cows, including those lying down	Moderate	Y	Y

LLL: 02:39	Slippery floor	Cow slips in parlour	Moderate	Y	Y
LLL: 00:07, 1:23 (same area, diff. light), 2:35 (diff. day); LLRH: 00:30	Undrained floor	Could become slippery and could fester disease-causing organisms. Should be cleaned at least twice a day. Moderate risk given vulnerable condition of dairy cows.	Moderate	Y	Y
LLMC2: 09:05	Premature removal	Calf removed at 24 mins of age, no sign illness, no attempt at suckling, a little afterbirth still hanging, though full afterbirth had not yet arrived as fully visible at 11:43. May or may not be a breach, depending on whether colostrum is impaired from mother.	Severe	X	X
LLMC2: 12:15 (afterbirth agitation); LLC: 02:54 (calves, crowded trailer); LLC: 3:39-4:04, 5:42-6:20 (many calf vocalisations in pens)	General (di)stress	General stressful conditions, all lowering cow resilience to further stressors, and all contributing to poor mental state and a reduction in quality of life. For calves, re-occurring chronic or acute stress can also impede development, leaving longer term impacts.	Low to severe	X	X
LLL: 01:10	Disease risk	Heightened disease risk from mixing species (chickens in with cows)	Moderate	X	X
LLC: 00:09 (+chase/intimidation), 0:44 (cry/fall), 1:06, 1:35 (cry/fall)	Ear tagging: general	Ear tagging at very young ages. All cases are primary and secondary in immediate succession. Fear/distress in calf visible from escape attempts prior to second tag. Avoidable pain/distress evident from cries/falls.	Moderate	X	X
LLL: 00:20, 2:58; LLMC1: 01:52; LLMC3: 07:28	Large udders	Can impede walking and comfort. Indicates high volumes of milk production, impacting on bodily reserves for restorative purposes.	Severe	X	X
LLL: 02:40, 3:10; LLMC1: 01:52; LLMC2: 07:40, 11:43; LLMC3: 13:32; LLRH: 00:10, 0:47, 5:02	Poor BCS	High milk production can use up more energy than cows can replenish, or disease can cause poor BCS. Cows may experience fatigue, malnutrition, and negative impacts on the adequate functioning of other bodily systems.	Moderate	X	X
LLMC1: 02:36, 5:05; LLMC2: 03:29, 11:00; LLMC3: 01:08, 1:39, 3:40-6:24; LLC: 03:06	MC separation (mother follows trailer/staff taking calf away)	Repeated attempts to gain access to calf by mother demonstrates strong motivation.	Severe	X	X

LLMC2: 01:50	MC separation (negative anticipation?)	Bellowing pre calf removal—anticipatory behaviour?			
LLMC1: 04:29, 06:20 7:20-8:04; LLMC2: 4:06-6:00, 7:20-8:04; LLMC3: 06:20, 11:47, 12:55	MC separation (bellowing, lingering, pacing, agitation, seeking calf)	All indicators of negative mental state (poor welfare) and strong motivation to reconnect with calf.			
LLC: 02:42	MC separation (calf escape attempt)	Calf escape attempt from trailer (legs out of side).			
LLC: 5:42 (x2), 6:03, 6:13, 6:20	Redirected oral behaviours	Stereotypical, redirected oral behaviours: cross-sucking, repetitive licking.	Severe	X	X

Farm 7: Bramleys Farm (CARE, Northamptonshire)

Table S7. The five categories of illegality and five categories of label breaches evident at Bramleys Farm.

Note: This is an Arla CARE farm. Breaches specific to Arla CARE remain unknown due to the absence of publicly available welfare criteria—other than requiring grazing for a certain period of time (Arla Foods, 2026). This information has been requested from Arla Foods, both via email and phone on multiple occasions, but this information has not been provided at the time of writing. Thus, Red Tractor and Arlagården standards have continued to be focused on for this farm. This footage was roughly only one minute in length and comprised exclusively quite close-up shots of the parlour. Hence, it is maybe unsurprising that no additional clear/major welfare problems were evident as distinct to illegality or label breaches. See instructions for understanding the table at the top of the file.

Timestamp	Welfare problem	Description	Severity	Leg / Code	RT / AG
00:03, 0:06 (or 0:30 view)	Rough handling: general	Body kicks/hits, cow already moving, in view of another worker	Severe	Y	Y
00:11	Rough handling: sensitive areas	Tail twisting, tail pulling, cow already moving, in view of another worker	Severe	Y	Y
00:10, 1:10	Intimidation / uncaring attitude	Shouting, swearing, light hits after falling	Moderate	Y	Y
01:10	Slippery floor	Cow slips	Moderate	Y	Y
01:10	Undrained floor	Could become slippery and could fester disease-causing organisms. Should be cleaned at least twice a day. Moderate risk given vulnerable condition of dairy cows.	Moderate	Y	Y

Farm 8: Oak Lodge Farm (Leicestershire)

Table S8: The three categories of illegality, five categories of label breaches, and three categories of other welfare problem evident at Oak Lodge Farm.

Note: This farm is part of Arla's standard Arlagården scheme. See instructions for understanding the table at the top of the file.

Timestamp	Welfare problem	Description	Severity	Leg / Code	RT / AG
Difficulty getting up/down step. DOWN: OLL1: 0:50, 1:20 (buckles, falls), 1:55, 3:59 [same cow]; OLL4: 2:50. UP: OLL1: 0:55, 3:00 [same cow]; 5:43 (30-min attempt), 6:19, 7:27 (25-min attempt)	Lameness: stepping (S3)	Difficulty getting up and off step.	Severe	Y	Y
OLL1: 0.13, 2:33, 3:49, 3:24, 4:26 [same cow, S3]; 5:35, 7:01 [same cow, S3]; OLL2: 0:10-2:53, 3:14, 5:41 [diff cows, S2]; OLL3: 0:33, 2:16, 5:09 [same cow], 3:52; OLL4: 0:19, 1:49 [same cow]; 3:06, 3:50, 4:26, 4:33, 5:10 [same cow]; 4:30; OLL5: 0:30, 1:22, 2:05 [same cow]; 4:34	Lameness: limping	Significant visible limp when walking.			
OLL1: 1:10, 3:07; OLL2: 4:54 (hunched back); OLL3: 1:18; 4:39, 6:05 (buckles) [same cow]; OLL5: 2:58, 3:45 [same cow]; 5:12, 5:30 (foot up for an hour) [same cow]	Lameness: standing (S3)	Difficulty standing.			
OLL2: 2:53; OLL3: 5:25; OLL4: 1:00 (from lying); OLL5: 0:10 (from lying)	Uncaring attitudes	Rushes lame cow.	Severe	Y	Y
Lying cows: OLRH: 0:10 (pinches), 0:38 (sand machine nudge); 0:55, 1:09, 1:15, 1:25 (kneeing/hitting lying cows)	Rough handling: lying cows	Rough handling of lying cows when urging them to stand.	Moderate	Y	Y
OLL1: 2:15, 5:30, 6:00; OLL2: 4:54; OLL3: 4:09; OLL4: 0:50	Poor BCS	High milk production can use up more energy than cows can replenish, or disease can cause poor BCS. Cows may experience fatigue, malnutrition, and negative impacts on the adequate functioning of other bodily systems.	Severe	X	X

OLL1: 5:30; OLL3: 2:34; OLL4: 1:39	Large udders	Can impede walking and comfort. Indicates high volumes of milk production, impacting on bodily reserves for restorative purposes.	Severe	X	X
OLL1: 3:17, 4:38	Soiled body	Shiny, wet.	Severe	X	X

Farm 9: Lower House Farm (CARE, Worcestershire)

Table S9. The seven categories of illegality, seven categories of label breaches, and one category of other welfare problem evident at Lower House Farm.

Note: This is an Arla CARE farm. Breaches specific to Arla CARE remain unknown due to the absence of publicly available welfare criteria—other than requiring grazing for a certain period of time (Arla Foods, 2026). This information has been requested from Arla Foods, both via email and phone on multiple occasions, but this information has not been provided at the time of writing. Thus, Red Tractor and Arlagården standards have continued to be focused on for this farm. See instructions for understanding the table at the top of the file.

Timestamp	Welfare problem	Description	Severity	Leg / Code	RT / AG
LHRH: 0:12, 0:20	Rough handling: sensitive areas	Tail twisting or pulling	Severe	Y	Y
LHRH: 0:10 (grat smack after worker slips), 0:34, 0:45 (gate, hard), 0:55 (v hard double smacks), 1:12 (downer cow); LHMC: 5:49 (whole body force into parlour)	Rough handling: excess force	Often completely gratuitous, without clear intended direction of movement, and/or no force-free methods first attempted	Severe	Y	Y
LHRH: 0:47, 0:55, 1:41	Uncaring attitudes	Swearing/shouting at cows, intimidation (extra to all other cases)	Severe	Y	Y
LHRH: 0:10, 0:40	Slippery floor	Worker/cow slips	Moderate	Y	Y
LHRH: 0:50, LHMC: 1:25, 7:53, 9:45	Undrained	Could become slippery and could fester disease-causing	Moderat	Y	Y

	floor	organisms. Should be cleaned at least twice a day. Moderate risk given vulnerable condition of dairy cows.	e		
LHRH: 1:06	Hygiene (worker urinates)	Urination in public workplace, disease risk. Whilst on phone and leaning against cow.	Low	Y	Y
LHMC: 2:00, 8:20	Excessive restraint / entrapment	Prolonged entrapment while awaiting entrance to parlour slot	Severe	Y	Y
LHMC: 1:20, 5:57 (calf cries); 1:40, 2:00-2:50, (cow motivated to return to calf)	Mother/calf separation	One detailed case of MC separation. Separated after short while of intense bonding, separated via intimidation and physical barriers. Possible preoccupation with direction of calf at 7:00 and bellowing at 9:04 but would need to see longer footage to ascertain behavioural time budget. Does seem a little different to other cows in area, but nothing majorly problematic.	Severe	X	X

Farm 10: Longlands Farm 2 (Derbyshire)

Table S10. The 10 categories of illegality, 10 categories of label breaches, and nine categories of other welfare problem evident at Longlands Farm 2 (as distinct from Longlands Farm 1 in Dorset).

Note: This farm is part of Arla's standard Arlagården scheme. See instructions for understanding the table at the top of the file.

Timestamp	Welfare problem		Description	Severity	Leg / Code	RT / AG
DC: 0:04 cow's full body dragged; 0:17 front legs & neck/chin dragged across floor, back legs in air, back legs & face at risk of bashing into moving wheels; 1:27 front limbs leave floor; 1:32 bashes into wheelbarrow; new day repeated hoist at 2:54, 4:36 & 5:15 (faceplant), 6:00. H: 6:47, 7:15 (back feet in air);	Misuse of hip hoist	Unsafe use of equipment	Cow is dragged between different farm areas using hip harness, including along hard floor. Hip hoist is intended for helping a cow to stand who can still independently bear weight—not for relocating or turning her. Staff should instead use a portable milker if downer cow	Severe	Y	Y

8:11 (hoist attached in lateral position); 8:15, 9:00, 9:25 (falls to face: no sling, belt, nor halter, back & front legs lifted off floor of cubicle). PC: 0:23 hoist from lat. with halter, back feet off			needs to be milked. Staff should instead manually roll cow to regularly change cow's position. (DC: one downer cow case study over 7 days).			
DC: 5:50, 6:24 & 6:35 & 7:53 (halter left on). PC: 1:43 (halter left on), 2:11 (halter pull to raise downer cow). RH: 1:05 tractor pulls halter	Misuse of halter		Halter should be used to support head and help direct movement—not as a means of moving a cow.			
DC: 3:50	Misuse of girth strap		Insufficient training in optimal use.			
PC: 5:00	Misuse of shackles		This cow's lameness results in her wishing to repeatedly kick back leg—shackles not useful for enabling this.	Moderate-to-severe	Y	Y
DC: 2:18, 4:04, 5:13 (urination of pen mate directly adjacent to face/head), 7:35. PC: 4:58, 5:25 (severe).	Soiled bedding		Additions of bedding appear insufficient to prevent down cow lying on soiled bedding over consecutive days—esp. problematic with open wounds.	Severe	Y	Y
SC: 1:03, 1:48, 2:50, 3:22, 3:57, 4:49, 5:00, 5:13	Soiled passage floors		Consecutively worse over eight days.	Severe	Y	Y
PC: 6:24	No bedding		Hospitalised cow in extremely poor state is on concrete with no bedding.	Severe	Y	Y
DC: 3:30, 7:27. PC: 0:29, 1:40, 2:22 (staff startle downer cow by dropping bale at her side). RH: 1:45.	Uncaring attitudes		Swearing at cow	Severe	Y	Y
H: 8:08 (tail pull); PC: 1:54 & 3:55 (nostrils)	Rough handling (sensitive area)		Usually when trying to move downer cow.	Severe	Y	Y
H: 7:08 (grat kick of hoisted, faceplanted cow). PC: 1:47, 2:00, 3:02, 3:58, 4:29 (kicks); 2:25 hit. SC: 2:40 push/kick, 4:20 (downer). RH: 1:49, 1:52, 2:18, 2:19, 2:25, 2:26, 2:40 from daughters (hits/kicks).	Rough handling (general)		Frequent kicks of downer cows (often resulting in cows collapsing after trying to stand).	Severe	Y	Y more expl.
SC: 5:15	Neglect		Recumbent, underweight cow with diarrhoea staying in one spot: no food for 3+ days and no water for 41 hrs.	Severe	Y (H)	Y (H)

RH: 2:58 (multiple, same cow), also see Figure S1 below.	Inappropriate goad (spanner)		Any goads used should be minimised, safe, and used solely for this purpose.	Severe	Y	Y
DC: 2:54, 4:36	Cow's wide eyes		An indicator of fear/distress.	Severe	X	X
DC: DC: 2:50, 5:25 & 6:35 (esp. severe)	Laboured breathing		Exacerbated, if not caused, by hip hoisting distress.	Severe	X	X
DC: 4:26, 6:35	Water access concerns for downer cow		Sometimes cannot access water for up to 15 hours.	Severe	X (H)	X (H)
DC: 5:25, 6:35, H: 6:21, 8:00, 8:11; PC: 0:09, 1:49, 5:17, 6:24. RH: 1:05	Lateral recumbency		Cows lying fully on their side is an urgent health risk; they should be turned into a sternal recumbent position.	Severe	X	X
H: 8:42, 8:44. PC: 4:58. SC: 4:44	Soiled body		Hind areas of cows soiled. Some is very old (as indicated by dryness). Indicator of soiled bedding.	Moderate-to-severe	X	X
DC: 4:08 (very shaky cow who is hoisted). PC: 2:34, 3:53 (cannot stand), 4:16. SI: 1:49 (wobbly)	Lameness		Indicates discomfort and pain, and limits highly motivated behaviours, impairing quality of life. In addition to those being hoisted or downer cows.	Severe	X	X
SC: 1:03, 2:15	Diarrhoea		In a cow with very poor body condition.	Severe	X	X
DC: 2:00, 7:34 (legs); 2:26, 2:32 +fly, 5:25 (hips). H: 7:59, 8:35, 8:44	Wounds / alopecia (equipment-specific)	Wounds, sores	Hip and front leg wounds (blood/sores) over multiple days from dragging cow on her ankles whilst hips are lifted. This reinforces the illegality outlined above.	Severe	X	X
PC: 5:30, 5:33, 5:39, 5:48 (same cow). SC: 0:55 (mod). SI: 0:48 near tail, upper leg; 0:54, 1:03, 1:07 hock/ankle; 1:15, 1:18 body/head (all pressure sores?)	Wounds, lesions (general)		Unknown if related to shackles/hoist. SC could be pressure sores.			
H: 8:44, 9:05; PC: 0:09, 2:34. SC: 0:10, 0:37	Poor BCS		High milk production can use up more energy than cows can replenish, or disease can cause poor BCS. Cows may experience fatigue, malnutrition, and negative impacts on the	Severe	X	X

		adequate functioning of other bodily systems.			



Figure S1. Inappropriate goad being used at Farm 10, LLRH: 2:58.