

Statement

On European Commission's report on farmed fish welfare

8 June 2026

Introduction

The Federation of European Aquaculture Producers (FEAP) welcomes the European Commission's (DG SANTE) overview report on Farmed fish welfare¹ (April 2026). However, FEAP warns that the report's main conclusions overlook fundamental scientific and operational challenges facing the sector.

FEAP strongly supports advancing good farming practices and more focused, species-specific legislation once best practices are established. Nevertheless, the report fails to address several critical realities that define European fish farming.

Key concerns

1. Welfare needs are not homogeneous across species, production systems, or life stages. The report does not adequately differentiate between fish species, production systems, and life stages. Welfare needs differ strikingly depending on the fish's species, life stage, and size. Juveniles have different requirements from portion-sized fish, which in turn differ from large fish weighing several kilograms. Furthermore, the farming system itself critically shapes welfare conditions. What ensures good welfare in one production context may be entirely inadequate in another. The report does not acknowledge how these biological differences affect its conclusions.

2. Significant scientific knowledge gaps exist, including a lack of academic consensus on measurement and interpretation. Substantial scientific uncertainty remains regarding key aspects of fish welfare, particularly stunning technologies. Scientific studies using electroencephalography (EEG) show that each farmed fish species responds differently to stunning methods. Electric stunning is not universally effective across species, sizes, or production systems. Moreover, there is a clear lack of scientific consensus among academics on the most appropriate methods for conducting measurements and interpreting results. FEAP cautions against premature regulatory requirements that assume scientific consensus where none yet exists.

3. Farm-level slaughter creates unique operational constraints. Unlike terrestrial livestock (and most Atlantic salmon farming in Northern Europe), fish stunning and slaughter in most EU Member States take place on farm premises, not in dedicated slaughterhouses. This imposes severe limitations on implementable technologies, presents significant worker safety risks, and is cost-prohibitive for thousands of small and micro enterprises. Furthermore, some stunning systems (e.g., percussion) are

¹ <https://ec.europa.eu/food/audits-analysis/overview/download/2108>

technically impossible for small portion-sized fish, which constitute the majority of EU production for rainbow trout, European seabass, and gilthead seabream.

4. Traditional coastal lagoon systems are overlooked. The report fails to acknowledge that pond fish farming is used not only for freshwater species but also for marine species, such as coastal brackish-water lagoons and tidal estuaries in Italy, Greece, and Spain. This production system, practised for centuries, represents Europe's aquaculture heritage. Referring to these as "pond marine systems" is confusing; the accurate description is coastal lagoons or brackish water systems.

5. On sentience and public concerns: nuance is required. The report's strong assertion that scientific evidence confirms fish are sentient and capable of experiencing pain, fear, and stress is not without its limits and degrees. Differences exist among farmed fish species, and even within the same species, domesticated fish exhibit significantly different stress responses than wild conspecifics. Regarding public concerns, the Commission relies almost exclusively on NGO studies, whereas widely recognised sources, such as Eurobarometer surveys, could offer a more comprehensive understanding of social perceptions.

6. The core problem is the lack of reliable documentation measures, not necessarily unacceptable current practices. As one leader of a competent authority has noted: it is not necessarily that current practices are unacceptable; rather, the key issue is that we do not yet have adequate measures to reliably document when a method can be considered acceptable. There is an urgent need to separate questions where knowledge is mature enough for legal requirements from those that remain at the research level. Welfare cannot be decoupled from viability.

FEAP position

FEAP fully supports science-based welfare improvements, but they must be practical, achievable, and proportionate. The Commission's report risks setting unrealistic expectations that fail to account for the sector's diversity, from small family-owned lagoon farms to larger marine operations. Legislation that ignores farm-level realities will not improve fish welfare; it will simply drive production outside the EU, where standards may be lower. FEAP calls for a focus on developing reliable documentation measures before imposing unworkable legal demands.

The Federation reaffirms its commitment to working with EU institutions and Member States to develop workable welfare standards that protect both fish and the future of European aquaculture.

The Federation of European Aquaculture Producers is an organisation that represents the European fish farming profession and is based in Brussels. FEAP is composed of 24 national fish farming associations from 23 countries, both EU and non-EU. The combined yearly production of FEAP members surpasses 2,5 million tonnes of nutritious, safe, delicious and environmentally sustainable fish.