

Position Paper

Transport of live fish: Revision of Council Regulation (EC) 1/2005

Background

The movement of live fish is integral to the business of finfish farming throughout Europe. The majority of finfish species that are raised in European aquaculture are moved at least once during their life while some are moved several times; this can be on or off farm.

A wide variety of fish transport systems are used in Europe, primarily on land and sea, reflecting the diverse nature of the European aquaculture industry.

As well as being a legal responsibility and ethical consideration, maintaining the welfare of fish in transport is an essential element in the economic performance of aquaculture businesses.

The Council Regulation (EC) 1/2005 that entered into force in 2007 is the actual relevant EU Legislation applying to the 'Welfare of Animals during Transport' and has been transposed into national legislation throughout Europe. Manuals for the transport of fish already exist in Germany¹, Scotland², Italy³, ... and are the results of common agreements between National authorities and stakeholders. They are obviously linked to local needs and fish species.

In May 2020, the European Commission announced the revision of the aforementioned Regulation in the framework of the EU Farm to Fork Strategy. In that perspective, the Federation of European Aquaculture Producers (FEAP) wishes to address some considerations regarding the transport of finfish.

Recommendations

Considering that:

- The transport of fish is not (at least partially) comparable to that of land animals;
- Farmed fish belong to different species with different ethological characteristics and with different transport methods and therefore there cannot be a single type of approach;
- Farmers and other aquaculture operators have acquired considerable experience in relation to transport and it is also important to consider the practical aspects developed as well as scientific or behavioural issues;

¹ https://www.lfl.bayern.de/mam/cms07/publikationen/daten/informationen/praktische-rechtliche-aspekte-transport-lebende-fische lfl-information.pdf

² http://thecodeofgoodpractice.co.uk/

³ http://www.salute.gov.it/imgs/C 17 pubblicazioni 2848 allegato.pdf

- High standards of food safety, operator safety (long journey transport times) as well as fish health (Animal Health Law⁴ and specific Delegated Regulation on the requirements for movements of aquatic animals and their products in the EU⁵) and animal welfare must be guaranteed.

The Federation of European Aquaculture Producers (FEAP) requests that the evaluation of the transport of fish, while considering as a priority the respect of animal welfare, should take due account of other aspects related to the aquaculture activity such are product safety, product quality, animal health and working environment, keeping an approach based on a holistic perspective.

The following aspects need to be taken into consideration when revising the legislation:

- Competence of personnel and training (owners, managers, transport companies, drivers, all persons handling fish)
- Planning of the journey
- Transporter authorisation
- · Equipment design, maintenance and servicing
- Desinfection of vehicle and equipment
- Preparation of the fish for transport
- Fitness of the fish to travel
- Loading of the fish
- Particular arangements for the transport of live fish by well-boat
- Monitoring during transport
- Unloading
- Monitoring of recovery
- Documentation

To be able to adopt best practice in welfare and to maintain high bio-security standards require good communication and co-operation between all parties involved: at the source farm, those transporting the fish and at the destination. There is a mutual interest and benefit to be gained by examining closely all elements of fish transport at the source site, in transit and on delivery.

Therefore, the FEAP wishes that the Legislators develop together with the stakeholders harmonised EU Guidelines specific for the transport of different fish species.

FEAP Secretariat, 30 April 2021

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.

⁵ https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32020R0990&from=EN#d1e461-42-1



www.feap.info -

⁴ https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0429