

# Position Paper

December 2023

On fish welfare: There can be no fish farming without fish welfare

#### Background

As the united voice of the European fish farming producers, FEAP represents 24 National Member Associations out of 23 countries. These encompass a wide range of farmed species including Atlantic salmon, rainbow trout, European seabass, gilthead seabream, carp, catfish, turbot, cod, sturgeon, meagre, and more, farmed under a variety of systems. This federation brings together professionals whose livelihoods depend directly on the quality of their work and on social acceptance to achieve the long-term viability of their operations.

The core belief of FEAP is clear. As fish farmers, we are the guardians of our fish stocks and are responsible for them. The viability of this activity depends on the quality of our products, which is directly impacted by the production conditions and welfare of the fish: there can therefore be no fish farming without good fish welfare. FEAP strives to strengthen the necessary compliance and proactivity of European fish farmers in providing the best production conditions and welfare for the fish.

However, <u>we wish to address concerns raised by negative communication campaigns that undermine the significant efforts made by European fish farmers in this regard</u>.

#### The general views of FEAP on fish welfare

As dedicated fish farmers, FEAP is deeply committed to the well-being of the species under our care. We recognize the vital importance of promoting fish welfare and continually strive to ensure the highest standards in our industry. We invest in scientific research, technology, training, and innovation to learn more about the specific behaviour and needs of the various species and thus daily improve the conditions in which they are raised. This includes continually monitoring the production environment, assuring the best water quality, and making nutrition and disease management key, as well as minimizing stress and ensuring respectful handling. European fish farming complies with applicable legal obligations and adheres to stringent regulations and standards designed to safeguard the welfare of the fish

As fish farmers, we not only care for our fish but strive to best communicate our efforts to prove it in front of society, public administrations, and non-governmental organisations. While very isolated cases of poor welfare practices might be observed in a sector that comprises tens of thousands of fish farming undertakings and a complex value chain, these do not reflect in any way the general practice, nor the overall commitment of European fish farmers to the well-being of their fish.

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This federation appreciates the role that non-governmental organizations (NGOs) play in advocating for animal welfare, including the welfare of fish. We however also believe that raising awareness and ensuring constructive efforts for change must go hand in hand with providing a true and realistic picture of the sector's current performance.

FEAP is firmly convinced that constructive collaboration between the fish farmers sector and NGOs can lead to valuable insights and contribute to the sustainable development of fish farming in Europe. On this note, we invite stakeholders to engage with us in an honest and constructive dialogue to address any concerns and collectively work towards even higher standards in fish welfare

#### The FEAP Position

- (1) Fish are not a single species but many and with considerable biological differences between them, including on welfare needs. Furthermore, fish farming in Europe is a very diverse activity taking place both in marine and fresh waters and using such different production systems as tanks, ponds, and sea pens.
- (2) FEAP promotes a holistic approach to fish welfare in which specific welfare issues must be considered alongside the limitations of the physical farming environment, workers' safety, environmental protection, product quality, and economic viability.
- (3) European fish farmers strictly follow rules and regulations on health and animal welfare that apply to fish.
- (4) FEAP understands that good practices at the farm level are key to ensuring the adequate welfare of fish and, for this reason, promotes their uptake within the sector.
- (5) The farming of most fish species is a young activity when compared to other livestock production. For this reason, even today important gaps exist in scientific knowledge on this matter. FEAP acknowledges that the recent creation of the EU Fish Welfare Reference Centre is a positive step, and recalls that its establishment has been a long-standing request of the sector. In particular, this federation recommends the centre to work on scientific validation, on the applicability of its recommendations to different farming conditions and on fish welfare operational indicators. FEAP highlights that in the past the sector has proactively contributed to advancements in fish welfare by participating in, and even leading, EU and national fish welfare scientific projects.
- (6) FEAP considers that when addressing fish welfare, the whole production cycle of the fish has to be addressed.
- (7) FEAP recognises the importance of adequate training for fish farm workers on this issue.



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- (8) FEAP wishes to highlight that fish welfare should not contribute towards the un-level market playing field with respect to other fish products, both imported into Europe or caught by fishing fleets.
- (9) F FEAP understands the relevance of communication to make society aware of how European farmed fish are treated. However, FEAP expresses concern with the misleading nature of several communication actions on fish welfare which have recently appeared in the media, and remains open and available to inform the press and the general public about the reality and efforts of fish farmers in Europe.

FEAP, 18 December 2023

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.

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