



## Press Release

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### **FEAP warns the European Commission that its fish welfare report misses science and critical practical realities**

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Brussels, 29 April 2026.- The Federation of European Aquaculture Producers (FEAP) welcomes the European Commission's (DG SANTE) recently released overview report on *Farmed fish welfare*<sup>1</sup>, but warns that its main conclusions overlook fundamental scientific and operational challenges facing the sector.

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

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 can 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 public discussion often overlooks the genuine challenge of setting fixed legislative thresholds given the substantial biological differences between species (e.g., rainbow trout vs. sturgeon in oxygen requirements). Although the Commission's report states that this is within its scope, it does not acknowledge how these differences affect its conclusions.

2. Significant scientific knowledge gaps exist, including a lack of academic consensus on measurement and interpretation. FEAP emphasises that substantial scientific uncertainty remains regarding key aspects of fish welfare, particularly stunning technologies. The report mentions this only superficially. Notably, scientific studies using electroencephalogram (EEG) technology show that each farmed fish species responds differently to stunning methods. Electric stunning, often presented as a perfect solution, is not universally effective across species, sizes, or production systems, and, on too many occasions, leaves fish immobilised but not insensate. Moreover, beyond the existing knowledge gaps, there remains a clear lack of scientific consensus among academics on the most appropriate methods for conducting measurements and interpreting the results. FEAP cautions against premature regulatory requirements that assume scientific consensus where none yet exists.

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

3. Farm-level slaughter creates unique operational constraints. The report fails to acknowledge a fundamental distinction: unlike for 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, such as sophisticated electrical equipment, and on what is possible on board small vessels in rough sea conditions or in open-air fields, and presents significant worker safety risks. Moreover, very advanced technologies are cost-prohibitive for thousands of small and micro enterprises operating fish farms across Europe. Finally, some stunning systems (e.g., percussion) are 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, among the main production systems, pond fish farming is used not only for freshwater species but also for marine species. Such is the case with coastal brackish-water lagoons and tidal estuaries in Italy, Greece, and Spain, a production system practised for centuries that 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. FEAP notes that the report's strong assertion that scientific evidence confirms that fish are sentient and capable of experiencing pain, fear, and stress is not without its limits and degrees. Differences exist between farmed fish species, and even within the same species, domesticated carp or salmon show significantly different stress responses (e.g., cortisol levels) compared to wild conspecifics. Generalisation is therefore problematic. Regarding public concerns, the Commission references NGO studies almost exclusively, whereas other widely recognised sources such as Eurobarometer surveys could offer a more comprehensive understanding. FEAP urges the Commission to include such data to avoid reinforcing a partial narrative.

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. Slaughter stations are now being met with demands for EEG documentation that are impossible, especially for smaller fish market sizes. There is an urgent need to separate questions where knowledge is mature enough for legal requirements from those that remain at research level, possibly for many years. Welfare cannot be decoupled from viability.

"FEAP fully supports science-based welfare improvements, but they must be practical, achievable, and proportionate," said Javier Ojeda, FEAP Secretary General. "The Commission's report risks setting unrealistic expectations that fail to account for the diversity of our sector, 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. We need to 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.

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### ***About the Federation of European Aquaculture Producers***

*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 25 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.*