

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>