Comments on the Green Paper on the Reform of the Common Fisheries Policy (COM(2009)163final)

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Introduction

The Green Paper states that "ecological sustainability is a basic premise for the economic and social future of European fisheries". Eurogroup for animals agrees that the protection of the environment is a prerequisite to an economically and socially sustainable Common Fisheries Policy. More specifically the impact on biodiversity conservation of proposed new rules for supporting EU fisheries and aquaculture must be thoroughly assessed before they are discussed and adopted. In particular, the impact of fish farming on the environment and on the fish welfare needs to be evaluated, including the production of feed for the farmed fish.

Eurogroup believes that no subsidy leading to negative impact on biodiversity should be granted. We accept that it is important to reduce the fishing fleet capacity and consequently support is needed to help people find alternative jobs in regions affected by this reduction.

In addition, animal welfare has been included as an objective of the renewed EU Sustainable Development Strategy adopted in June 2006 and is now fully integrated in the Lisbon Treaty. Article 13 states: "*In formulating and implementing the Union's agriculture, fisheries, transport, internal market, research and technological development and space policies, the Union and the Member States shall, since animals are sentient beings, pay full regard to the welfare requirements of animals, while respecting the legislative or administrative provisions and customs of the Member States relating in particular to religious rites, cultural traditions and regional heritage".*

Eurogroup for Animals calls on the European Commission to respect its obligations to take into account animal welfare when adopting proposals to reform the Common Fisheries Policy, both concerning fisheries and aquaculture.

Impact of aquaculture on the environment

Although there are some positive effects of some types of aquaculture on the environment (for example in integrated farming systems), the effects are mostly negative. Especially during intensive farming on sea, the nets and cages are in constant exchange with the surrounding environment and this might have negative impact on the local ecosystem.

The environmental threats of aquaculture include the following:
Nature and environment:

- Organic deposition: On the seabed around fish farms the amount of organic carbon and nitrogen are increased, due to organic material coming from fish faeces and uneaten feed. The fauna on the seabed under fish farms shows a marked reduction in number of species, and in extreme cases with the release of high quantities of ammonia and nitrite the water can become toxic to fish and shrimp.
- Anti-foulants: Free flow of water through sea cage netting can be restricted to hinder the outflow of waste products. Nets are therefore often coated with an anti-foulant chemical containing copper and zinc. The release of these substances to the environment might imply a biological risk, and further investigation on this topic is encouraged in order to find non-toxic alternatives of coating sea cages.
- Chemical therapeutants: Different medicines are used for treating diseases in aquaculture, most of them against sea-lice. After the treatment the chemicals are released into the natural environment. The

residues of the medicines can be very long lived and some of them can cause severe environmental damage.
- Habitat degradation: More than half of the world's population lives within 60 km of a coast. Fish farms in coastal areas compete with the natural habitats and many other important functions for people.
- The impact of predator control on wildlife such as seals.

Impact on wild fish populations:
- Capture based aquaculture: For capture based aquaculture juvenile fish are caught from the wild and are further fattened in cages. This is done especially with eels, groupers, tuna and yellowtails. The natural population decreases drastically as the practice reduces natural juvenile population and the subsequent natural production of adult breeding animals is diminished. In addition, the large by-catch (up to 85%) is discarded and results in the destruction of billions of other finfish juveniles. There might be welfare concerns for the wild caught fish due to the high level of stress caused. Capture based techniques should be banned unless the sustainability of the natural populations can be assured. Research on farming methods allowing controlling the complete lifecycle of the target species in captivity is encouraged.
- Transmission of diseases and parasites: Serious epidemics in the stocks of Atlantic salmon have been linked to movements of fish for aquaculture and re-stocking. As an example, the sea lice (*Gyrodactylus salaris*) was introduced to Norway through imported salmonid eggs and juveniles after which it spread throughout the whole country. Sea lice originating from aquaculture farms can be a serious threat to wild salmon populations.
- Escapes of fish: The main causes for escapes from cages into open waters are collision, bad weather, construction failures and human mistakes. Farmed salmon are genetically selected for fast growth and late maturity and they are more aggressive than wild salmon. Escaped fish threaten wild populations due to competition for food and habitat, transmission of diseases and dilution of the natural gene pool. Genetic pollution from escapees breeding with wild salmon can have a detrimental effect on the survival of wild populations. Increased attention and improvement in procedures and installations is needed in order to reduce the risk of escapes.

Fish feed:
- Contrary to popular belief, the farming of carnivorous fish such as salmon, trout, halibut and cod *adds* to the pressure on wild fish stocks. Over 3 tonnes of wild-caught fish are needed as feed to produce 1 tonne of farmed salmon. For the newly farmed marine species such as halibut and cod, the ratio is over 5 to 1.
- Extensive or traditional aquaculture systems use little or no fish meal and oil in the feed for farmed fish. The rapid expansion and intensification of high-value carnivorous fish such as shrimp, salmon, cod, sea bass and tuna, causes a growing demand for fish oil and fish meal for fish feed. The catching of huge amounts of wild fish as ingredient for fish feed may cause a depletion of food for wild fish which may threaten their survival. Further research is needed to make fish feed more sustainable, reducing the amount of fish oil and need in feed. Surplus of feed should be avoided as it can have a negative impact on the surrounding environment.

Eurogroup believes that any support to aquaculture farms under the CFP must be conditional to the respect of strict measures to prevent negative impact on the environment.

Impact of aquaculture on animal welfare

Animal welfare is part of sustainable development. Indeed an objective of the renewed EU Sustainable Development Strategy adopted in June 2006 is "*Continuing to promote high animal health and welfare standards in the EU and Internationally*". In addition, animal welfare is now fully integrated in the Lisbon Treaty, with Article 13 clearly stating the EU and Member States obligations to pay full regard to the welfare requirements of animals when formulation the EU's fisheries policies.

The vast majority of farmed fish in Europe are reared intensively, with large numbers of fish at high stocking

density. Lighting, water temperature, feeding regime and breed selection are often manipulated to increase production. The fish are confined in a range of pens, tanks, fast-flowing raceways and earth ponds.

The main welfare issues include high stocking densities leading to tail and fin injuries, disease and behavioural abnormalities, parasitic sea lice infestation in salmon that are treated with strong chemical nerve toxins, slaughter methods, pre-slaughter starvation, and genetic manipulation.

Eurogroup believes that the establishment of EU standards for the protection of farmed fish is urgently needed, as well as standards to protect fish at the time of slaughter. These standards need to be based on scientific data. The European Food Safety Authority has published in 2008 several opinions and scientific reports on the welfare of farmed fish[1] and in 2009 reports on stunning and killing of farmed fish, which can be used to shape standards. In addition several research projects have been carried out or are on-going, to look at sustainability and animal welfare in aquaculture systems[2]. Results show the need for robust and simple monitoring systems to ensure adequate surveillance of the environment and associated fish welfare.

In the meantime, the respect of the Council of Europe recommendations on fish farming should be a prerequisite for fish farms to receive support from the CFP. This would need the establishment of a system similar to cross-compliance in the Common Agricultural Policy.

Eurogroup is also concerned that possible implications on animal welfare of some measures of the CFP concerning aquaculture could be:

- Diversification of farmed species could lead to many welfare problems and thus need to be supported by thorough research on how these species can be kept in an animal-friendly way.
- In researching alternative protein sources for carnivorous fish, animal welfare must be taken into account.
- Fish cages should be placed farther away from the coast but this should not lead to less care for the fish or greater chance for escapes.
- A special effort has to be made to improve training. Animal welfare must be part of it.
- Even it the Commission stimulates self regulation and voluntary agreements, it needs to set EU rules for animal welfare. Animal welfare must be part of any agreement.

Consequently Eurogroup believes that before being adopted, any new measure of the CFP must be evaluated for its impact on animal welfare. In addition, concerning the external dimension of the CFP, Eurogroup believes that the objective should also be responsible and sustainable fisheries, and that the welfare of farmed fish should be fully included in future partnership agreements.

[1] Animal welfare aspects of husbandry systems for farmed common carp http://www.efsa.europa.eu/EFSA/efsa_locale-1178620753812_1211902226269.htm
Animal welfare aspects of husbandry systems for farmed European seabass and gilthead seabream http://www.efsa.europa.eu/EFSA/efsa_locale-1178620753812_1211902193915.htm
Animal welfare aspects of husbandry systems for farmed trout http://www.efsa.europa.eu/EFSA/efsa_locale-1178620753812_1211902132105.htm
Animal welfare aspects of husbandry systems for farmed fish - European eel http://www.efsa.europa.eu/EFSA/efsa_locale-1178620753812_1211902132140.htm
Animal welfare aspects of husbandry systems for farmed Atlantic salmon http://www.efsa.europa.eu/EFSA/efsa_locale-1178620753812_1211902014109.htm

[2] FASTFISH : On farm assessment of stress level in farmed fish (http://fastfish.imr.no/); BENEFISH: *Evaluation and Modelling of BENEfits and Costs of FISH Welfare Interventions in European Aquaculture (http://www.benefish.de/index.php);* WEALTH*:* Improving the health and welfare of farmed fish (http://wealth.imr.no/); EUROCARP: Disease and Stress Resistant Common Carp: Combining Quantitative, Genomic and Proteomic and Immunological marker technologies to identify high performance strains, families and individuals (http://eurocarp.haki.hu/); AQUAFIRST: Combined genetic and functional genomic approaches for stress and disease resistance marker assisted selection in fish and shellfish (http://aquafirst.vitamib.com/)

Impact of fisheries on non-target species

Eurogroup is especially concerned about the threats to small cetaceans due to by-catch in fishing devices.

Incidental capture in fisheries involves the deaths of harbour porpoise in gill-net fisheries which have been of particular concern. Estimates[3] for the period 1992-2001 indicated a mean annual bycatch of around 5,800 harbour porpoises killed annually in Danish bottom set gill-nets fisheries in the North Sea with lower catches in the later years due to a reduction in effort and landings. Bycatch has also been of particular concern for the common dolphin, especially around the south west coasts of UK, and for the Baltic harbour porpoise population, due to major declines in numbers (only around 600 individuals in 1995), and unsustainable bycatch rates[4]. The harbour porpoise is also the most frequently recorded species caught incidentally in the Black Sea. In the Mediterranean Sea, common and striped dolphins are most commonly reported but bottlenose dolphins are also affected. Reports from Morocco, Spain and Italy also suggest that bycatch may occur in illegal drift netting operations.

Given the foreseen and already observed increase in the number of fishing vessels deploying gill and tangle nets, it is likely that without effective preventive measures, the porpoise bycatch problem in certain areas in the North Sea will only increase[5].

Given the EU competence and responsibility in fisheries and environment and animal welfare protection, it is essential that adequate measures to prevent the by-catch of small cetacean and other non-target species such as sea birds and sharks in fisheries are integrated in the reform of the Common Fisheries Policy. Long term research is also needed, both to collect data on the actual status of small cetacean populations and the percentage of stranded cetaceans due to fisheries by-catch, and on efficient preventive measures such as pingers. Compulsory measures to protect non-target species against by-catch must be integrated in future legislative proposals, and they should be accompanied by mechanisms ensuring they are correctly implemented.

Summary of Eurogroup demands

- Animal welfare to be part of the impact assessment when preparing proposals to reform the Common Fisheries Policy, both concerning fisheries and aquaculture.
- Support to aquaculture farms under the CFP to be conditional to the respect of strict measures to prevent negative impact on the environment and on the fish welfare
- EU standards for the protection of farmed fish to be established, as well as standards to protect fish at the time of slaughter
- The respect of good standards to protect the welfare of farmed fish to be fully included in future international partnership agreements.
- Measures to prevent by-catch of small cetaceans and other non-target species to be incorporated in the proposals for the reformed CFP
- Research into efficient measures to protect non-target species to be funded by the EU

This Contribution is prepared in cooperation with Eurogroup for Wildlife and Laboratory Animals (EWLA)

[3] Vinther, M. and Larsen, F. 2002. Updated estimates of harbour porpoise by-catch in the Danish bottom set gillnet fishery. Paper SC/54/SM31 presented to IWC Scientific Committee, Shimonoseki, Japan.
[4] Berggren, P., Wade, P., Carlstrom, J. and Read, A. 2002. Potential limits to anthropogenic mortality for harbour porpoises in the Baltic region. *Biological Conservation* 103:311-322.
[5] The harbour porpoise in the southern North Sea: Abundance, threats and research- & management proposals (2009). A report by Jan Haelters & Kees C.J. Camphuysen, commissioned by IFAW.