From: Peter Stevenson [Peter@ciwf.org]
Sent: lundi 21 décembre 2009 19:37
To: MARE OLD CFP CONSULTATION
Subject: Contribution to the consultation - Non-registered

Compassion in World Farming wishes to contribute to the consultation on the Green Paper on a reform of the Common Fisheries Policy. In particular we wish to comment on section 5.9 on aquaculture.

Compassion in World Farming has offices in the UK and the Netherlands and representatives in France, Poland, the Czech Republic, Bulgaria and Ireland. We are one of the co-ordinators of the activities of the European Coalition for Farm Animals which comprises 38 animal welfare organisations in 25 Member States plus Norway, Switzerland and Norway.

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Introduction

We believe it is essential that EU policy on aquaculture takes account of, and sets standards for, the welfare of farmed fish

In 2008 the European Food Safety Authority (EFSA) produced Scientific Reports and Opinions on the welfare of six of the main fish species farmed in the EU. EFSA pointed out that farmed fish are exposed to various husbandry stressors in intensive aquaculture that can lead to injury, stress, increased disease susceptibility and impaired performance. [1]

The Commission Communication *Building a sustainable future for aquaculture* emphasises the need to achieve a high level of protection of fish welfare. Equally welcome are the Council Conclusions in June 2009 that recognise the importance of fish welfare. [2] Nonetheless, Compassion in World Farming fears that fish welfare may be given insufficient attention as fresh impetus is given to growth of the aquaculture sector.

Health problems and disease

EFSA points out that "the intensification of fish farming has inevitably resulted in the emergence of disease problems, in particular of diseases of infectious origin". [3] EFSA states that diseases in farmed fish are closely linked with stressful husbandry and environmental conditions and are "generally an indicator of an underlying husbandry or environmental deficiency". [4]

Norwegian researchers have pointed out that certain production-related diseases have emerged concurrently with the intensification of husbandry practices. [5] These include various types of skeletal deformities, soft tissue malformations and eye cataracts. Skeletal malformations in farmed fish include spinal, head and jaw deformities as well as softness of

the skeleton.[6] Deformities are a recurrent problem in farmed Atlantic salmon and other farmed species and EFSA states that the sustained production of deformed fish challenges the credibility of the industry and is an ethical issue of increasing importance.[7]

Crowding, handling and grading

Fish are sometimes crowded to aid handling, for example prior to grading, transport and slaughter. Crowding is stressful and can lead to damage to scales, skin ulceration, eye damage and bruising.[8]

Many farm activities – vaccination, grading, loading prior to transport and unloading, movement to the stunning point - involve handling the fish and/or moving them around the farm. Handling is stressful, particularly if it entails removal from the water. It can result in scale loss and injuries to the skin, eyes and fins.[9] Grading fish into different sizes is also a stressful procedure[10] and can lead to physical injury to the fish.

Crowding, handling and grading should be kept to a minimum. All farms should employ the methods used on the best farms and should keep up-to-date with developing best practice in this area. Fish should only be removed from water when absolutely necessary[11] and should not be kept out of water for more than 15 seconds unless anaesthetised.[12]

Stocking density

EFSA concluded that stocking density is a major factor affecting salmon welfare and that high stocking densities may lead to increased aggression, physical damage and decreased water quality.[13] High stocking densities in Atlantic salmon and rainbow trout can also result in increased susceptibility to disease, fin damage and poor body condition.

A UK researcher stresses: “Stocking density is a pivotal factor affecting fish welfare in the aquaculture industry, especially where high densities in confined environments are aimed at high productivity”.[14]

Transport

Capture, loading and transport can cause extensive stress in fish.[15] During transport, fish can sustain injuries from physical interaction with other fish or abrasion with the tank walls. Poor conditions during transport, such as overcrowding and inadequate water quality, may result in irreparable damage to the fish and mortality. Transporting fish poses a significant risk of spreading disease.

We are opposed to the transport of live fish over long distances. Transport must be kept to an absolute minimum. We agree with a Norwegian aquaculturalist’s conclusion that “local production of eggs and juveniles and local processing [slaughter] is the answer”.[16]

Selective breeding

Selective breeding is widely used in aquaculture to achieve faster growth, improved feed conversion rates and greater resistance to disease. However, EFSA points out that there is a possibility that selection for resistance to one disease may compromise resistance towards another.[17]

Intense selection for fast growth or enhanced productivity has led to serious health problems in other farmed species such as meat chickens and dairy cows. We fear that farmed fish could soon begin to experience analogous health and welfare problems if the drive to accelerated growth rates continues unabated. EFSA has pointed out the lack of data on the possible negative effects of genetic selection on functional systems (respiratory, cardiac, locomotion, reproduction) and disease susceptibility. [18] EFSA has recommended that genetic selection of salmon should take into account possible consequences for their welfare of any changes. [19]

Slaughter

In 2009 EFSA produced Scientific Opinions on the welfare at slaughter of eight of the main fish species farmed in the EU. EFSA concluded that

- Pre-slaughter procedures can lead to highly adverse effects on welfare. These procedures include (i) feed withdrawal for lengthy periods, (ii) crowding, particularly if it entails very high densities for long periods and (iii) removal from water.
- Many of the slaughter methods in commercial use in the EU result in the fish remaining conscious for lengthy periods before death and lead to very poor welfare. EFSA stressed that the industry should, as a matter of urgency, develop more humane slaughter methods.

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Kind regards

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[1] Scientific Opinion of the Panel on Animal Health and Welfare on a request from the European Commission on animal welfare aspects of husbandry systems for farmed European seabass and Gilthead seabream. *The EFSA Journal* (2008) 844, 1-21

[2] Council Conclusions on a Strategy for the Sustainable Development of European Aquaculture. 2952nd Agriculture and Fisheries Council meeting. Luxembourg. 22 and 23 June, 2009.

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