



Photography by Dos Winkel



**Request of the Dutch Society for the Protection of Animals
on
the reform of the Common European Fisheries Policy**

- *Wild caught fish*

Given the scientific evidence¹ and the broad European consensus that fish can experience pain and stress and that they are able to suffer (EC, CEU, EFSA)²,

given that catching and killing techniques on board of vessels are not adequate to ensure fish welfare (fish spend hours in nets, get damaged, are gutted while conscious, or kept on ice, which only paralyzes them and not make them unconscious³),

given that new catching and killing techniques that don't harm the welfare of the fishes are easier and quicker to develop for the small-scale fisheries,

given that world wide large-scale fisheries (vessels larger than 15 m) have more access to subsidies compared to small-scale fisheries⁴ whereas:

large-scale provide ½ million employed fishermen	vs. 12 million in small-scale fisheries
35 million t of their annual catch is reduced to fishmeat and oils	vs. almost none in small-scale
37 million t fuel oil is used up	vs. 5 million t in small-scale
1-2 t fish is caught per t fuel	vs. 4-8 t fish in small-scale
8-20 t is discard	vs. very little in small-scale fisheries ⁴ ,

knowing that the total annual catch for human consumption is similar for large vs. small-scale fisheries (30 million t)⁴,

and the fact that reduced stress during the killing procedure increases product quality⁵,

we call upon the European Commission to include amendments in the Green Paper on the reform of the Common Fisheries Policy related to animal welfare in wild caught fish which are aimed to:

- 1) stimulate subsidies for innovative research into the possibilities for 'humane' catching and killing methods on board of small-scale fishery vessels. This will not only increase fish welfare on board of vessels, but also improve product quality, reduce discards, reduce fuel consumption and stimulate local economy. In future these developments may be extended to larger scale-fisheries⁴
- 2) reward efforts made on improving fish welfare on vessels by stimulating a MSC like label which, aside from ecological sustainability, also includes fish welfare as important criterion
- 3) stimulate programmes which are developed to increase awareness among fishermen that fish can experience fear, pain and stress.

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- *Aquaculture*

Given the scientific evidence¹ and the broad European consensus that fish can experience pain and stress and that they are able to suffer (EC, CEU, EFSA)²,

the fact that the conditions for high animal welfare standards and efficient stunning and killing vary between species⁶,

the fact that current aquaculture is often not sustainable since they a) use juvenile wild stock, b) feed the farmed fish more wild fish than they produce (up to 20x), c) do not have proper housing, transport and killing methods,

we call upon the European Fisheries Commission to include amendments in the Green Paper on the reform of the Common Fisheries Policy related to animal welfare in aquaculture which are aimed to:

- 1) introduce and implement sustainability in a broader sense into fisheries which, like in livestock farming, includes animal welfare
- 2) ensure fish welfare through stimulating and subsidizing research into indicators of fish welfare, husbandry conditions, transport mechanisms and duration and stunning/killing methods for each specific fish species
- 3) restrict the type of fish that are allowed to be kept for aquaculture; only those are kept for which it is certain that animal welfare is not compromised, wild stock is not in danger and for which it is not required that wild fish are caught for food
- 4) ensure more detailed Commission Regulation and implement European legislation for good husbandry conditions and 'humane' slaughter of fish
- 5) stimulate training of husbandry staff in fish welfare.

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References

1 Complete issue on pain and distress in fish in the scientific journal: Institute for laboratory animal research
http://dels.nas.edu/ilar_n/ilarjournal/50_4/html/

2 European Commission (2009) acknowledges that there is now sufficient scientific evidence indicating that fish are sentient beings and that they are subject to pain and suffering notably when they are killed <http://www.europarl.europa.eu/sides/getAllAnswers.do?reference=E-2009-1140&language=EN> and EFSA (European Food Safety Authority) (2009). General approach to fish welfare and to the concept of sentience in fish.
http://www.efsa.europa.eu/EFSA/efsa_locale-1178620753812_1211902344910.htm

3 Lambooy et al. (2006) Assessment of electrical stunning in fresh water of African Catfish (*Clarias gariepinus*) and chilling in ice water for loss of consciousness and sensibility. *Aquaculture* 254 388–395.
http://www.sciencedirect.com/science?_ob=ArticleURL&_ud=B6T4D-4HNYMCK-2&_user=10&_rdoc=1&_fmt=&_orig=search&_sort=d&_docanchor=&view=c&_searchStrId=1127183602&_rerunOrigin=scholar.google&_acct=C000050221&_version=1&_urlVersion=0&_userid=10&md5=73db5a7ed7f403e31025c39d3a7b8052

4 Jacquet J. & Pauly D. (2008) Funding priorities: Big barriers to small-scale fisheries. *Conservation Biology*, 22, 832–835.
<http://www.seas-at-risk.org/1images/Jacquet%20%20Pauly%20Barriers%20to%20Small-Scale%20Fisheries.pdf>

5 Morzel M. & van de Vis H. (2003) Effect of the slaughter method on the quality of raw and smoked eels (*Anguilla anguilla* L.). *Aquaculture Research*, 34, 1-11. <http://www3.interscience.wiley.com/journal/118931516/abstract>.

6 EFSA (European Food Safety Authority) (2008). Welfare aspects of animal stunning and killing methods for 5 species of fish.
http://www.efsa.europa.eu/EFSA/efsa_locale-1178620753812_1211902131969.htm