



FAWC, Area 8B, 9 Millbank, c/o Nobel House
17 Smith Square, London, SW1P 3JR
Tel: 020 7238 5016

To: Organisations on the enclosed circulation list

5 December 2011

Dear Sir/Madam

FAWC Opinions on the welfare of farmed fish and on the welfare of farmed fish at slaughter

The Farm Animal Welfare Committee (FAWC) is conducting a study over the next year leading up to two Opinions, one on the welfare of farmed fish generally, and one on the welfare of farmed fish at slaughter. The detailed work will be carried out by the Pigs, Poultry and Fish Standing Committee, chaired by Professor Mike Appleby, and the Welfare at Killing Standing Committee, chaired by Professor Henry Buller. The two Committees will collaborate to avoid duplication of effort.

The Farm Animal Welfare Council produced a Report on the Welfare of Farmed Fish in 1996, which was influential in raising the profile of animal welfare in the fish farming industry. Since the Council's 1996 report there have been many changes both in understanding of fish welfare and in the industry. It is appropriate to review both progress and new issues that are arising in providing an assessment of whether the welfare of farmed fish has improved, declined or remained the same since 1996.

The 1996 report covered mainly salmon and trout. These are still the large majority in the UK, but an increasing diversity of species is farmed, including tilapia, sea-bass, cod, halibut and charr. Species differences are often ignored by people unfamiliar with the subject but many are profound. Fish are also markedly different in their physiology to terrestrial farmed species and the effect these differences have on the assessment of their welfare will need to be taken into account.

Welfare of farmed fish (excluding slaughter)

The number of animals involved is huge: a breeding unit may contain a million fry. There are many challenges in inspection and individual identification, especially at earlier developmental stages. Systems are also very diverse, including tanks (which may re-circulate water), freshwater systems and sea nets. Major areas to be covered include environmental conditions (especially water quality), diseases and parasite infestation, nutrition, genetics, mutilations, emergency killing, movement/handling and transport.

Welfare of farmed fish at slaughter

The 1996 FAWC Report on the Welfare of Farmed Fish contained a section on 'Killing and Slaughter', confirming the principle that "farmed fish must be killed humanely" (para 233). However, the considerable expansion of fish farming over the last 15 years, the introduction of new technologies and changes to the national and European regulatory and legislative context regarding both fish farming and killing, mean that a new informed Opinion is necessary.

EU Regulation No. 1099/2009 on the protection of animals at the time of killing specifically excluded detailed provisions for farmed fish from its remit and this Opinion will give FAWC an opportunity to contribute to the additional scientific and economic opinion on the welfare of farmed fish at killing solicited by the EU in that Regulation.

Over 35 million farmed salmon and trout are reported to be slaughtered annually within the UK. While there has been an increasing centralisation (falling numbers of companies but increased production) of salmon and trout enterprises, other forms of fish farming have developed as part of small-scale agricultural diversification.

There is a variety of killing methods employed in the industry, some of which involve pre-stunning, others not. The welfare issues specific to each will be explored, and the need for further improvements in humane practice will be considered.

Consultation

If you have comments to offer about the welfare of farmed fish and the welfare of farmed fish at slaughter, please send them to me at the FAWC Secretariat, Area 8B, 9 Millbank, c/o Nobel House, 17 Smith Square, London, SW1P 3JR (e-mail: richard.aram@defra.gsi.gov.uk) **by 24 February 2012**.

In addition to this consultation exercise, we may write to some organisations with specific questions as work progresses. Some may also be invited to discussions with the Group. Normally FAWC Opinions list the names of the organisations that gave evidence. Should you prefer to be excluded from the list, please let us know when you reply.

We also expect to hold a public consultation meeting in 2012, and shall write again with information on that in due course.

If you believe there are any important omissions from the list of consultees, I should be obliged if you would let me have the name and address of an appropriate contact.

Further information on the role of the Farm Animal Welfare Committee is on our website <http://www.defra.gov.uk/fawc>. The 1996 Report on the Welfare of Farmed Fish can be found at <http://www.fawc.org.uk/reports/fish/fishrtoc.htm> .

Yours faithfully,

Richard Aram
FAWC Secretariat

ADAS
OneKind (formerly Advocates for Animals)
Aldi Stores
All Party Parliamentary Group for Animal Welfare
Animal Health Trust
Animal Rights Law Centre
Aqua Gen
Aqua Innovation
ASDA Group Plc
Associated British Foods
Association of Scottish Colleges
Assured Food Standards
AWSELVA
Babraham Institute
Biotechnology and Biological Sciences Research Council (BBSRC)
British Institute of Agricultural Consultants
British Retail Consortium
British Society of Animal Science (BSAS)
British Trout Association
British Veterinary Association (BVA)
Budgen Stores Ltd
Cefas
Compassion in World Farming
Conservative Animal Welfare Group
Consumers Association
Consumers in Europe Group
Convention of Scottish Local Authorities
Co-operative Group (CWS) Ltd
Defra
English Nature
Eurepgap
Eurogroup for Animal Welfare
Farm Animal Care Trust
Farm Animal Initiative
Farm Animal Welfare Network (FAWN)
Farm Assured Welsh Livestock
Farmers' Union of Wales
Federation of Veterinarians in Europe
Fish Vet Group, Inverness
Fish Veterinary Society
Fisheries Society of the British Isles
Food and Drink Federation
Food Aware
Food Standards Agency
Freedom Food Ltd
Hannah Research Institute
Humane Slaughter Association
Institute for Animal Health
Institute of Biology
Institute of Food Research
Institute of Grocery Distribution
Institute of Trading Standards Administration
International Fund of Animal Welfare (IFAW)
J Sainsbury plc
John Lewis plc
LACORS
Lakeland Smolt Ltd
Landcatch
Lantra

Marine Harvest
Marine Scotland
Marks & Spencer plc
National Association of Local Councils
National Consumer Council
National Consumer Federation
National Council of Women of Great Britain
National Farmers Union
National Farmers' Union of Scotland
National Farmers' Union (Wales)
National Federation of Meat & Food Traders
National Federation of Women's Institutes
National Federation of Young Farmers Clubs
National Office of Animal Health Ltd (NOAH)
National Proficiency Tests Council (NPTC)
Nuffield Council on Bioethics
Organic Food Federation
People for the Ethical Treatment of Animals
Roslin Institute (Edinburgh)
Rowett Research Institute
Royal College of Veterinary Surgeons
Royal (Dick) College of Veterinary Studies
Royal Society for the Prevention of Cruelty to Animals (RSPCA)
Royal Veterinary College
Safeway Stores plc
Scottish Agricultural College
Scottish Centre for Animal Welfare Science
Scottish Consumers Council
Scottish Salmon Producers Association
Scottish Society for the Prevention of Cruelty to Animals
Scottish Government
Shetland Aquaculture
Silsoe Livestock Systems
Soil Association
Somerfield Stores Ltd
SUSTAIN - The Alliance for Better Food & Farming
Tesco Stores Ltd
Universities Federation for Animal Welfare
University of Aberdeen
University of Bristol
University of Cambridge
University of Edinburgh
University of Exeter
University of Glasgow
University of Leeds
University of Liverpool
University of Newcastle upon Tyne
University of Nottingham
University of Oxford
University of Plymouth
University of Reading
University of Stirling
University of Wales, Aberystwyth, Bangor
Vegetarian Economy & Green Agriculture (VEGA) Research
Veterinary Laboratories Agency
Veterinary Medicines Directorate
WM Morrison Supermarkets Ltd
Waitrose Ltd
Welsh Consumer Council
Welsh Government

Welsh Local Government Association
Women's Food & Farming Union
World Society for the Protection of Animals (WSPA)