

SEY Animal Welfare Finland

Explanatory statement

to the Commission consultation on the update of the Strategic Guidelines for the Sustainable Development of Aquaculture

While awareness among people concerning the poor energy efficiency and unsustainability of the meat production is growing world-wide, the demand for developing the aquaculture sector in the EU is becoming more and more crucial. Overfishing is a global threat for the fish stocks and by improving the aquaculture industry, EU has an opportunity to serve the growing demand for the fish protein based diet locally and simultaneously reduce our dependency on already endangered wild fish stocks. However, the growth of aquaculture cannot happen to the prejudice of the fish and their wellbeing.

Science is proving all the time more studies about fish's ability to suffer and feel pain and there exists already more data about it than about birds' ability to feel pain. Nonetheless, in the aquaculture industry, there are still many methods in use, which are undisputedly painful and stressful for the fish for instance egg collection without anaesthesia, high densities (causes eroding for the fins) and stunning by using carbon dioxide just to mention a few.

Fish are not only sentient but also intellectual beings who need far more diverse and stimulating habitat that they have so far being experiencing. Farmers' slogan is often that "only a healthy animal is a productive animal". Unfortunately, this is not the truth. Growth rate and condition of health are not sufficient indicators for evaluating the wellbeing of the fish. In addition to these, fish would need a chance to fulfil natural behaviour to their species even at some level. Currently fish are probably being treated the worst of all the farmed animals and their possibility to implement their natural behaviour under current circumstances is almost non-existent.

To fulfil sustainability in its purest sense, development of the aquaculture sector cannot happen without increasing the attention for the needs and wellbeing of the fish. Our concern is that in sustainable development of aquaculture, environmental sustainability will overcome fish and their quality of life. For instance, further adopting of the RAS-systems can even partly decrease the wellbeing of the farmed fish (by causing higher densities and more unnatural environment) despite of its environmental benefits. Variety of fish species in farming is vast and their needs differ a lot. Thus, it is crucial that standards to be implemented will be as species specific as possible.

Sustainability and animal welfare should not be separate but coexisting goals for the development of aquaculture. Since EU cannot compete with imports on price, we can have the highest standards on environment and on animal welfare. It is also important to raise awareness about aquaculture sector and make the industry and its practices more transparent to the consumers. High standards for environment and animal welfare can cause a win-win situation for the aquaculture industry and for the nature.