

# Sub-group on the protection of animals at the time of killing

Fifth meeting, 26/10/2022  
(Videoconference)

## – MINUTES –

### Attendance

<b>Independent expert</b>	Birte Nielsen
<b>Civil society organisations</b>	Eurogroup for Animals Compassion in World Farming
<b>Business and professional organisations</b>	UECBV FVE European Meat Network
<b>Member States</b>	Denmark Spain Netherlands Sweden Ireland
<b>European Commission</b>	Denis Simonin SANTE G5 (Chair) Christian Juliusson SANTE G5
<b>Guest(s)</b>	EY (absent)  Expert on salmon  Expert on trout  Expert on seabass and seabream  The expert on carp could not attend due to connection issues.

### Discussions

The meeting was solely dedicated to the killing of farmed fish.

#### 1. Presentation and questions salmon production (see presentation attached)

Salmon production is concentrated in Norway, UK (Scotland) and Ireland. There is only legislation on the killing of salmon in Norway but all productions in UK and Ireland are RSPCA approved. Salmon are slaughtered on land-based facilities. Percussive stunning is systematically applied after electro-sedation.

Post-stun checks are performed systematically and establishments are under video-surveillance as part of the RSCPCA certification.

Members of the group raised questions about electro-sedation, pre-harvest checks, anaesthetics. The expert replied that electro-sedation was a kind of stunning but because of risk of recovery, it was always followed by percussive stunning and bleeding. There was no easy way to distinguish electro-immobilisation from stunning and this is why it was always followed by another procedure. The process of stunning is applied in all companies whatever their size in Scotland. It is likely that regulation will come in the UK but the sector is already prepared and such requirements should not have major impacts.

## **2. Presentation and questions on trout production (see presentation attached)**

There are different types of trout production between “white” (less than 500g), “pink” (up to 1 kg) and “large” (beyond 1.2 kg). These differences are also related to the type of farming (fresh water, sea water) and the type of marketing (processed through big companies vs whole fish in local markets). The size of fish has an influence on the choice of the stunning method, mechanical methods being only feasible for big size fish while electrical stunning being more flexible for any size. Most trout farms are small enterprises. Small electrical stunners (tanks) are available on the market and used. However, killing by asphyxia on ice slurry is still practiced. The use of carbon dioxide was also used in the past. The farmers tend to monitor the stunning efficiency.

One member wanted to know the economic aspects of small companies. The expert replied that stunners for small scale farming was available for an affordable price (less than 1000 EUR) but the important factor was rather the training of the personnel that have to perform different tasks. The expert also confirmed that small tank stunner could work for both fresh and sea water even if parameters for an effective stun differ. These machines are usually easy to set up in line with manufacturers instructions. It is also important to follow manufacturers’ instruction for personnel safety.

## **3. Presentation and questions on seabass and seabream production (see presentation attached)**

The expert insisted on the fact that most the seabass and seabream production are on sea managed by small companies. Stunning maybe performed by wet or dry electrical stunning but most fish are killed on ice slurry without prior stunning. For the expert, most of the stress comes from crowding and they did not find significant differences in terms of stress or meat quality with or without stunning. The expert also underlined that there are still important knowledge gaps on various aspects of the production. On this model of production, they perform stunning on board and do not consider viable to envisage slaughterhouse inland (like for salmon). Hence, there is a conflict in term of space within the boat for stunning equipment vs other uses of the boat. These boats are multi-purpose and installing a stunner is problematic for small companies. Under the current knowledge, the expert does not expect implementing stunning to all the sector before 10 years.

One member wanted to know why fish are not bled. The expert confirmed that fish are not bled for most of the production (95%) and the remaining part is processed few days after killing. For him, it is mainly a matter of size of the fish and the expert on trouts also confirmed that most portion trouts were sold without being bled or gutted. The experts also said that it was a matter of consumers’ attitude in some markets, where fish are always sold without being bled or gutted. In absence of bleeding, a member questioned how the stunning procedure could ensure the stunning was lasting long enough to ensure a loss of consciousness until death.

Following the discussion on the size of farms, the expert on trout mentioned that most Member States exempted small farms from EU hygiene rules under a production of 100 kg liveweight per day. DG MARE would possibly have some data on the number of micro-enterprises.

## **4. Discussion on the impacts of EU regulation on fish killing**

The meeting was then open for a general debate on the perspective of extending the EU legislation on the protection of animals at the time of killing to farmed fish.

One member suggested that the EU establishes an EU reference centre for the welfare of farmed fish. The Chair declared that the Commission has already established centres for different species (pigs, poultry and small farmed animals, ruminants and equids). There was no need for a new legislation for establishing an EU reference centre for the welfare of farmed fish. The legal base already exists through the official controls regulation. However, the legislation could introduce the obligation for Member States to establish a “scientific support” for the killing of fish as it is required for the killing of terrestrial animals.

One of the invited experts declared that some measures applicable to terrestrial animals could be relevant like training requirements or the obligation of monitoring the effect of stunning. However, the expert reminded the group that fish are very different from terrestrial animals and they should not transpose too quickly requirements of terrestrial animals to aquatic ones. The Chair reassured the expert that the group was well aware of the specificities of the aquaculture sector but considered that this should not exclude to look for inspiration.

One member considered that regulation on the killing of fish was indeed needed but we should remain realistic. A transitional period of 10 years has been used for important welfare changes in the past (like for laying hens). There was also a need for training. However, the member underlined that defining stunning and killing for fish remains a scientific challenge. The member also believed that we should not exclude the possibility of inland slaughter facilities whatever species concerned. On the other hand, due to the technical and scientific challenges, the member considered that the legislation should remain generic to allow development in the future. The member however thought that small scale farming should not be excluded from animal welfare requirements. The member also argued that the EU should at least emphasise that some of the methods used today, such as putting the fish on slurry or just remove water (asphyxiation) are not within the current EU definition of stunning and should hence not be accepted or listed as stunning methods.

One expert confirmed that an EU reference centre for farmed fish would be very useful. The expert argued that while we mentioned only on five species today, much more species are subject to aquaculture in Europe and each fish species differs greatly between each other compared to terrestrial animals.

Another expert also warned the group against a legislation that would be too prescriptive. The welfare of farmed fish being still at its infancy, the expert is convinced that we should let the sector innovate and focus on results rather than providing too many detailed rules.

## **5. Calendar for the next meeting and any other business**

The Chair announced that next meeting on 23 November will be dedicated on the ban of the killing of day-old chicks. He informed the members that a German and a French officials would present their experience of the ban. He also pointed out that the question was debated at the last AGRIFISH Council meeting on 17 October 2022.

The Chair concluded the meeting by thanking the experts for their excellent presentations, and their availability.