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15th October 2024

The Rt Hon Daniel Zeichner MP
Minister of State
Department for Environment Food and Rural Affairs
Seacole Building, 2 Marsham St
London, SW1P 4DF

Subject: Defra's commitment to the AWC recommendations on fish welfare

Dear Minister,

We are writing regarding the need to set out specific requirements in law for the humane killing of farmed fish, as afforded to terrestrial farmed animals, and the significant public support for doing so. Despite fish being the second most farmed animal group in the UK, with approximately 77 million individuals slaughtered annually, their welfare remains largely neglected by UK law.

In your reply to the joint NGO animal welfare letter (ref: PO2024/16533/AD, 9th October) you rightly make reference to the general protection afforded for the humane slaughter of farmed fish. However, while there is a legal obligation under The Welfare of Animals at the Time of Killing (England) Regulations 2015 (WATOK) to spare fish from any avoidable pain, distress or suffering during their killing, fish are not included in the definition of 'animal' for the purpose of the more detailed provisions in WATOK. There are no specific requirements as to how they should be delivered, held, stunned or killed.

This means legislation afforded to farmed fish is not equitable with the legislation afforded to terrestrial farmed animals. Creating this legislation would aid the Animal and Plant Health Agency investigations and any appropriate action by clearly demonstrating where there is non-compliance with regulations.

We have today released a new poll¹ that reveals 85% of UK citizens believe fish welfare should be protected to the same or greater extent as other farmed animals. Giving fish the same legal protections as terrestrial animals would not only help to deliver the major boost to

¹ Public Attitudes to Aquatic Animal Welfare: UK 2024. Research by Sapience on behalf of Compassion in World Farming and Eurogroup for Animals, via an online survey during 20th March to 5th April 2024. https://www.ciwf.org.uk/media/7459029/2024-uk-aquatic-animals-survey_ciwf_efa_sapience.pdf

animal welfare the Labour Government has pledged, but it would also be hugely popular with the public.

The previous UK Government requested the Animal Welfare Committee (AWC) to update their 2014 Opinion on the Welfare of Farmed Fish at the Time of Killing. This was an encouraging development and was followed, in March 2023, by an All Party Group for Animal Welfare (APGAW) reception (March 2023) and roundtable (January 2024) that further demonstrated broad consensus² on the need for mandatory species-specific legislation for farmed fish. Key industry players are also supportive of the AWC's recommendations.

Introducing fish welfare legislation would not only support businesses that have already adopted best practices, but also encourage wider industry compliance by those not operating at the high standards the public would expect. Moreover, public opinion is clear: 84% of citizens support legislation that requires best practices for fish welfare, and 90% would prefer to buy higher welfare seafood products.

While we appreciate Defra's efforts to explore welfare standards in collaboration with the aquaculture industry, more than a year has passed since the publication of the AWC Opinion. We are therefore eager to now hear how these recommendations will be transformed into legislation.

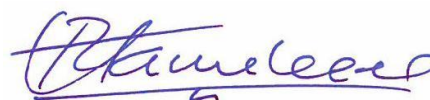
We urge Defra to commit to implementing the AWC's recommendations and provide a detailed roadmap with clear milestones and timelines. Industry guidance and voluntary schemes are insufficient. Legislation is needed to ensure that farmed fish, like other sentient animals, are fully protected in the UK.

We would welcome the opportunity to meet with you and discuss this further.

Yours sincerely,



Anthony Field
Head of Compassion in World Farming UK



Reineke Hameleers
CEO, Eurogroup for Animals

² <https://www.thegrocer.co.uk/news/campaigners-and-sector-agree-on-need-for-tighter-farmed-fish-slaughter-laws/687484.article>