

# BVA and FVS response to ASC consultation on new requirements to improve welfare of farmed fish

## Who we are

1. BVA is the national representative body for the veterinary profession in the United Kingdom and has over 19,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. The Fish Veterinary Society are a specialist division of the BVA. The Fish Veterinary Society is a forum for Veterinary Surgeons with an interest in fish as well as Fish Health Professionals and veterinary students. It also promotes fish welfare and an increasing stake in the health management of fish whether farmed, in public aquaria or in the ornamental sector including fish kept as pets.
3. We welcome the opportunity to respond to this consultation on fish health and welfare and benthic impacts in ASC farm standards. Our response is specifically focused on health and welfare of finfish killed in the UK.

## Summary of our position

4. We are of the view that welfare at slaughter including the harvesting of fish begins on-farm, starting with preparation of animals for slaughter, ensuring the population is fit for transport, and ending with slaughter either on farm or at the abattoir or harvesting station. Slaughter processes should result in a humane death for all animals, including fish, minimising avoidable pain, distress, fear, and suffering.
5. We support the Farm Animal Welfare Council's (FAWC) principles of humane slaughter as set out in [the FAWC opinion](#) and [reports on the welfare of farmed animals at slaughter or killing](#).
6. Species-specific needs should be considered at all stages of the slaughter process, and all animals, including farmed and wild caught finfish.
7. We welcome the proposal to make stunning compulsory as well as the inclusion of general welfare protections at slaughter.

## Criterion 2.14c – Fish Health and Welfare – Slaughter

**Taking into account that day-to-day farming and handling operations are dealt with in separate criteria, do you think there are any welfare aspects missing from 2.14c?**

8. All personnel involved with slaughter must be trained, competent and caring. We therefore welcome the requirement that staff are properly trained in welfare and slaughter practices.

9. Any handling of animals prior to slaughter must be done with consideration for the animal's welfare. The use of pre-slaughter anaesthesia (rested harvesting) for fish before they are removed from the water should be explored further. This method of harvesting is currently not permitted in the UK as iso-eugenol which is used in the process, is not licensed for use. Given the welfare benefits of rested harvesting, we would support further research into the use of preslaughter anaesthesia for fish in the UK to improve welfare at the time of harvesting. This should include consideration of appropriate anaesthetic concentrations, exposure times, water temperature and fish size, weight, as well as whether it is safe for this product to be licensed for use in fish entering the UK food chain.
10. Only fish that are fit should be caught to be loaded and transported to the slaughter site. Transport to a harvest station, or point of slaughter remote from the production unit, should be in accordance with general safe transport guidance as set out in RSPCA Assured standards and The Code of Good Practice for Scottish Finfish Aquaculture from Scottish Salmon<sup>1</sup>. We support the following principles based on guidance set out by FAWC and the Humane Slaughter Association in particular, to safeguard the welfare of fish during these transport operations:
  - Due regard should be paid to pumping rate and pressures, pipe diameters relative to fish size and final stocking density in transport tanks.
  - Water quality should be monitored during transport and maintained within acceptable limits.Transfer from a transport vessel or vehicle to the point of slaughter should deliver the fish to that point at a rate consistent with rapid and immediate stunning and killing. The period between removal from the water and slaughter should be minimal, in accordance with RSPCA Assured standards and The Code of Good Practice from Scottish Finfish Aquaculture.
11. Suitable slaughter facilities need to be provided and the animals slaughtered as near to the point of production/origin as possible, or at the nearest appropriate slaughter facility.

**Indicator 2.14c.1 – Are there any stunning methods missing from the suggested proposed list of permitted methods list (Table 1)?**

12. No - When used as per the key parameters and conditions as set out in Tables 1-6 of the FAWC Opinion on the Welfare of Farmed Fish, we consider these methods will deliver an effective stun. Automated percussive stunning systems are now widely used in Scottish salmon farming operations, and we are encouraged by the potential welfare improvements development of electrical stunning may bring. These systems, when properly maintained and monitored, are considered humane and effective. However, it is important that such systems have staff in place to check and manually stun and bleed any fish not effectively stunned by the automatic system.

**Indicator 2.14c.1 – Are the transition periods proposed in Table 1 adequate?**

13. We would support transition periods being shorter where possible, but recognise this may not be practical in all sectors. All animals should be effectively stunned before slaughter to render them unconscious and therefore insensible to pain, distress, fear and suffering.

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<sup>1</sup> <https://www.salmonscotland.co.uk/code-of-good-practice>

**Do you agree with the statement that unconsciousness must be induced in less than 1 second?**

14. Yes; All animals should be effectively stunned before slaughter to render them unconscious and therefore insensible to pain, distress, fear and suffering. We therefore welcome the introduction of the requirement to ensure that fish stunned lose consciousness immediately.

**Indicator 2.14c.3 – Is a stunning efficiency of 98% adequate?**

15. All animals should be effectively stunned before slaughter to render them unconscious and therefore insensible to pain, distress, fear and suffering. To ensure effective stunning, methods should be evidence-based and have a high, repeatable success rate (measured by the % effectiveness over time). The UoC should strive for 100% stunning efficiency, and have staff in place to check and manually stun and bleed any fish not effectively stunned by the automatic system.

**Indicator 2.14c.4 – Are there any killing methods missing from the proposed list of prohibited methods?**

16. In addition to the prohibited killing methods in the proposed standard, killing by rapid chilling should also not be permitted for finfish killed in the UK. Those methods are not considered humane and do not deliver an effective stun.

**Should any of the proposed prohibited killing methods be removed from the list?**

17. No - Those methods are not considered humane and do not deliver an effective stun.

**Is a stunning/killing efficiency of 98% adequate?**

18. Slaughter processes should result in a humane death for all animals, and this includes all fish being effectively stunned before slaughter to render them unconscious and therefore insensible to pain, distress, fear and suffering. To ensure effective stunning, methods should be evidence-based and have a high, repeatable success rate (measured by the % effectiveness over time). The UoC should strive for 100% stunning/killing efficiency, and have staff in place to check and manually stun and bleed any fish not effectively stunned/killed by the automatic system.

**Do you consider the inclusion of the following indicator appropriate: *The UoC shall ensure that all bloodwater produced during the slaughter process is contained and treated before being discharged. Treatment must ensure that the discharge poses no veterinary or environmental risks and is compliant with local legislation.***

19. Yes; We support this indicator being included