

Animal Welfare Committee
Nobel House, 17 Smith Square
London
SW1P 3JR

Friday 3rd December 2021

Dear Members of the Animal Welfare Committee,

We write to you today as concerned citizens and as specialists in our respective fields of animal study and aquatic animal research.

On Tuesday 23rd November, The Guardian revealed that there are currently no routine inspections taking place within farmed fish slaughterhouses across England, Wales and Scotland. This concerns us, deeply.

The UK rears and slaughters up to 77 million fish each year, with Atlantic salmon, trout and other aquatic animal species farmed in significant numbers. There is growing recognition within the global scientific community that fish, cephalopods and decapods are able to experience pleasure and pain, like cows, pigs, chickens and other farmed land animals who receive detailed welfare protections at the time of killing. Despite this, by not conducting frequent inspections, the UK Government is desperately failing aquatic animals and we urge you to hear our plea on their behalf.

In February 2021, animal protection organisation, Animal Equality, released footage captured during a covert investigation into a salmon slaughterhouse operated by major producer, The Scottish Salmon Company. Despite a Baader stun-kill device being in place in the facility, the investigation revealed significant numbers of salmon showing signs of consciousness at the time of killing, as verified by world-leading aquatic animal scientists and veterinarians. Some fish had their gills cut while still conscious, and many had to be manually clubbed to ensure adequate stunning – in one case seven times. Other live fish were shown being violently thrown to the ground by workers and left to asphyxiate. Even when expensive welfare infrastructure is in place, lapses in implementation can cause animal suffering on a catastrophic scale; there is a critical need both for increased legislation for aquatic animals and ongoing, third-party oversight. Had Animal Equality's investigation not taken place, the suffering of these animals would have gone unnoticed.

Defra has confirmed that it is currently *“considering issues raised in the review of the welfare of animals at the time of killing (England) regulations, including detailed protections for the welfare of farmed fish”*. In light of this news, we are reaching out to you in the hope that your Committee will use its authority, power and influence to encourage UK Governments to heighten oversight of the farmed fish industry as a matter of urgency.

At present, adequate monitoring and inspections are clearly not taking place, as the recent article exposed. In order to ensure that existing and future farmed fish legislation is upheld, the UK Governments have an obligation to conduct regular, frequent, and unannounced inspections into slaughterhouses across Scotland, England, Wales and Northern Ireland. The Government has a duty of care to the aquatic animals raised for consumption, as well as UK

consumers, to ensure that compliance is maintained and to penalise those companies who fail to meet expected standards. The industry cannot continue to be permitted to self-regulate.

To that end, we appeal to you to strongly encourage the devolved UK Governments to:

- Put in place consistency measures, where a certain rate of failure in any welfare metric triggers machinery halt, requires summoning of a vet, and provokes an official inspection of the facility by a Government official / neutral third-party.
- Hold aquatic animal slaughter facilities to the same legal standard as farmed land animal abattoirs, ensuring that they are subject to regular announced and unannounced inspections by the APHA, taking place no less than once per annum. A system of license probation and revocation ought to be implemented for non-compliance with WATOK laws.
- Make CCTV mandatory in farmed fish slaughter facilities, with impartial, third-party monitoring and, because animal welfare is in the public interest – even when taking place in private facilities – all mortality data, inspection results, and CCTV feeds ought to be published centrally, publicly and immediately by the commissioning body.

With a heavy reliance on opt-in certification schemes, and a lack of governmental oversight, aquatic animals are being seriously let down. Please, use your power to change this.

Yours sincerely,

1

Marc Abraham
BVM&S, MRCVS

2

Dr Jonathan Balcombe
Biologist & Author of 'What a Fish Knows'

3

Dr Marc Bekoff
Professor Emeritus of Ecology and Evolutionary Biology
University of Colorado, US

4

Professor David Bilchitz
Professor of Law
University of Reading, UK
&
Professor of Law
University of Johannesburg, South Africa
&
Vice-President
International Association of Constitutional Law

5

Dr Claire Blennerhassett

Senior Lecturer, Faculty of Health, Social Care and Medicine
Edge Hill University, UK

6

Mark Borthwick

OOCOTP Doctoral Fellow: Salmon Farming

7

Sabrina Brando

Director & Founder, Practical Animal Welfare Science platform
AnimalConcepts, Spain

&

PhD Candidate

University of Stirling, UK

8

Dr Bryony Chetwynd-Glover

BVSc MRCVS CertAqV

9

Dr Julien Dugnoille

Senior Lecturer in Anthropology

University of Exeter, UK

10

Ian J.H. Duncan

Professor Emeritus, Department of Animal Biosciences

University of Guelph, Canada

11

Wasseem Emam

Doctoral Researcher

University of Stirling, UK

12

Dr Becca Franks

Research Scientist, Environmental Studies

New York University, US

13

Professor Stevan Harnad

Editor

Journal of Animal Sentience

&

Professor of Psychology

Université du Québec à Montréal, Canada

&

Adjunct Professor of Cognitive Science

McGill University, Canada

&

Emeritus Professor of Cognitive Science

University of Southampton, UK
&
Comité Consultatif
Droit Animalier du Québec (DAQ), Canada

14

Billo Heinzpeter Studer
President
Fair-Fish International Association
&
Guarantor
Fish Ethology and Welfare Group, Portugal

15

Dr Gene Helfman
Emeritus Professor Odum School of Ecology
University of Georgia, US

16

Dr Lara Herring
PhD Research Assistant, Centre for Human Animal Studies
Edge Hill University, UK

17

Professor Kathy Hessler
Director, Animal Law Clinic & Director, Aquatic Animal Law Initiative
Lewis & Clark Law School, US
Signed in personal capacity; title for affiliation purposes only

18

Professor Andrew Knight MANZCVS, DipECAWBM (AWSEL), DipACAW, FRCVS, PFHEA
Professor of Animal Welfare and Ethics & Founding Director, Centre for Animal Welfare
University of Winchester, UK

19

Dr Christian Medaas
PhD Research Fellow, Department of Social Anthropology
University of Oslo, Norway

20

Dr Emma Goodman Milne
BVSc, MRCVS

21

Catalina Lopez Salazar, BVetMed
Director, Aquatic Animal Alliance
Aquatic Life Institute, New York, US

22

Dr Lynne Sneddon
Principal Investigator

University of Gothenburg, Sweden

23

Dr Richard Twine

Co-Director, Centre for Human-Animal Studies
Edge Hill University, UK

24

Professor Svante Winberg

Department of Neuroscience
Uppsala University, Sweden

25

Dr John Webster, Vet MB, DVM (Hons, London), MRCVS

Founder Member

Farm Animal Welfare Council

&

Former Head, Centre for Animal Welfare and Behaviour
University of Bristol, UK