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To the
Pangasius Aquaculture Dialogue (PAD)
c/o World Wide Fund for Nature (WWF)
39, Xuan Dieu St
Ha Noi, Vietnam

June 23, 2009

Comments on the first draft of International Standards for Responsible Pangasius Aquaculture

Dear Flavio Corsin
Dear PAD members

We greatly appreciate the PAD's acknowledgement that «fish stocking density may be an important element of maintaining fish health and welfare» (Draft Standards, Issue 6)

Yet, **stocking density** as such is **not** a measure of fish welfare, is just **one** of the pre-conditions for fish welfare as low density allows space for structuring the habitat (see fish husbandry system, below).

In your comments about «the why and the therefore» (Annex, Standard 6) you rightly admit not disposing on a sound basis to decide «which density could be considered as respecting the fish welfare».

We don't know neither, yet our feeling is that fixing a maximum acceptable level of fish density based on the typical mixed purpose practice observation remains somehow arbitrary and even inconsistent. Animal welfare issues are to be looked at based on ethological methods.

Arbitrary rules are subject to all kind of questions. For instance, what is the reason behind the PAD's proposition to fix the maximum of fish density at 80 kg/m³ in cages, whereas in ponds it should not exceed 18 kg/m³? (Annex, Issue 6, Standards).

What is the difference between cages and ponds *from the point of view of the fish*, and to which extent would this justify higher density in cages?

Besides that, the maximum of fish density should be defined as at harvest. The definition proposed by PAD «generally at harvest» will cause endless discussion in practice.

Required action: More ethological research is requested.

Examples of subjects to be studied:

- what is the water volume usually claimed by shoals of Pangasius in the wild?
- which stocking density is adequate to the proportion found in the wild?
- allowing this proportion in a farm, are there any negative impacts on the fish which urge to increase stocking density? If so, why and to which extent?

Fish husbandry system

Serious standards for responsible aquaculture should meet the needs of the species concerned. In order to identify these needs, we have to be able to answer questions like:

- What are the essential behavior patterns of the species?
- What are the essentials of the natural habitat of a species?
- How can these essentials be recreated in an artificial living space in order to allow the individuals of this species to behave and live according to its characteristic needs?
- Which are the adverse effects on the species to be avoided by the system and its management?

Required action: More ethological research is requested.

Examples of subjects to be studied:

- structures to be integrated in the system (light/shadow, withdrawal options, varying flow velocities)
- measures to avoid acoustic or visual disturbance

Slaughtering

We are astonished that the PAD draft for standards does not propose any criteria concerning the slaughtering process although for this issue some relevant studies have already been carried out. To sum up these studies, it seems pretty evident that a fish, like terrestrial farm animals, should be stunned and killed before slaughtering and processing - last but not least in order to prevent stress hormone distribution.

Required action: More physiological research is requested.

Examples of subjects to be studied:

- What are the most effective stunning methods for *Pangasius*?
- Which of these methods is most likely to be well adopted and carried out in daily practice?
- Which workable methods of killing are safely leading to death while *Pangasius* is still nonsentient?

On need of ethological research

As we had already proposed to the Tilapia and the Trout Dialogues, we suggest that the PAD initiates some ethological research to get answers to the above mentioned questions. Keep in mind that animal welfare is a key issue in aquaculture as it directly affects the quality of the product for which you'd like to find enough consumers paying a good price – and animal welfare is more than obtaining some good laboratory values after the fish has been slaughtered.

And if consumers in 10 years will put more and more questions about fish welfare, will you be prepared for the right answer? Will you be able to suddenly switch to a more fish friendly husbandry system? Would it not be wiser to adopt it before you will be confronted with a lack of credibility? Yes, but who can tell you how and why? Push the research! Use the intercontinental and interdisciplinary power of the PAD to make ethology move forward!

If instead research is decidedly out of the focus of the PAD, at least define animal welfare standards in a way that they will obligatory adopt later scientific findings.

Fish feed

Without going into details, we think the general task in this issue is to bring down the ratio of fish catch in the fish feed well and truly much below 1.0. Fishing for farming is not really sustainable. We feel the average fish in : fish out ratio of aquaculture should be at 0.5 or lower (not counting directly recycled byproducts of fish processing to fish feed).

This said, we feel the feed for omnivores like *Pangasius* should contain an even much lower ratio as this species can also be fed without fish meal or fish oil.

On the other hand, feeding fish should avoid also to rival humane consumption.

Is there a true need for another certification scheme?

There exist already various certification schemes for aquaculture:

- Friend of the Sea (FOS) focussing on sustainability of the production and some social criteria, with a total of certified production of at about 350 tons per year (more than the sum of bio labels)
- several bio (eco) labels with criteria including some animal welfare issues
- Besides that, there are two international schemes
 - the privately built body GlobalGap setting voluntary standards for good practices in agriculture (including aquaculture) and
 - GAA founded by shrimp aquaculture companies which is not a third party certification scheme.
- And much more local labels.

Thus, the problem in aquaculture is not a lack but an oversupply of labels confusing consumers, producers and vendors. Is there a true need for an additional certification scheme like the one proposed by the WWF Aquaculture Dialogues and the presumptive Aquaculture Stewardship Council (ASC)?

On the other hand, there is space for a competing scheme which yields added value like animal welfare and feed sustainability.

Thank you for your attention and your work.

Kind regards

fair-fish association


Heinzpeter Studer
Director

PS:

Thank you for your invitation to the meeting of August 5-6 in Vietnam. With regard to my already charged travel program I will have to cope with, attending will most probably be impossible for me. Thus, please let me know if there is any contribution from our side which we should input before the meeting.