

ANALYTICAL REPORT – EU Overview Report on Farmed Fish Welfare (2026)

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INTRODUCTION

Aquaculture has become a central pillar of global food production, and the European Union is no exception. With more than one billion farmed fish slaughtered annually, the EU aquaculture sector occupies a significant position in the region's food system and blue economy. Yet, as the 2026 *EU Overview Report on Farmed Fish Welfare* highlights, fish welfare remains an underdeveloped and inconsistently regulated dimension of European animal production. Despite growing scientific consensus confirming that fish are sentient beings capable of experiencing pain, stress and fear, the mechanisms designed to protect their welfare lag far behind those applied to terrestrial livestock. As the report notes, “fish are among the most widely farmed animals in the EU... yet they are often absent from public and policy debates on animal welfare,” and “most national systems did not yet include routine, dedicated checks on fish welfare at farms or at slaughter.”

This regulatory and operational gap is emerging at a time when consumer expectations, NGO scrutiny and EU policy priorities are converging toward higher welfare standards across the food chain. The European Commission has initiated a process of regulatory modernisation—strengthening transport rules, developing species-specific indicators, and establishing the EU Reference Centre for Aquatic Animal Welfare—signalling a clear trajectory toward more stringent and harmonised requirements.

For Latin American exporters, this evolving landscape presents both opportunities and challenges. The EU remains a key market for salmon, trout, tilapia, seabass, pangasius-type species and other aquaculture products originating from Chile, Peru, Brazil, Colombia, Ecuador, Mexico and Central America. While the current absence of fish-specific welfare requirements for imports preserves market access in the short term, the medium- and long-term outlook points toward increasing regulatory convergence and the potential introduction of welfare-based equivalence conditions. Exporters that anticipate these shifts—by adopting humane slaughter methods, implementing welfare indicators, and strengthening documentation—will be better positioned to maintain competitiveness and secure long-term access to the EU market.

This analytical report synthesises the main findings of the EU Overview Report, evaluates their implications for Latin American exporters, and outlines strategic actions to prepare for the forthcoming regulatory transition. It aims to support policymakers, competent authorities and industry leaders in understanding the direction of EU policy and in designing proactive responses that safeguard trade flows while promoting responsible aquaculture practices.

Below is a concise but fully structured analytical report, integrating the content of the EU Overview Report on Farmed Fish Welfare and a dedicated section on impacts for Latin American exporters (Peru, Chile, Ecuador, Brazil, Colombia, Central America)

“Fish are among the most widely farmed animals in the EU – with an estimated over a billion farmed fish slaughtered annually; yet they are often absent from public and policy

debates on animal welfare.” “Most national systems did not yet include routine, dedicated checks on fish welfare at farms or at slaughter.”

The EU’s 2026 Overview Report reveals a **fragmented, uneven and weakly enforced welfare governance system** for farmed fish across Member States. While scientific consensus confirms fish sentience, the regulatory framework remains **generic, non-species-specific**, and **poorly operationalised**. Official controls are inconsistent, mostly focused on transport, and rarely applied at farm or slaughter level.

For **Latin American exporters**, this creates a **dual scenario**:

Opportunities

The EU currently lacks harmonised, enforceable welfare standards → **market access remains open** for exporters meeting basic sanitary and traceability requirements.

Exporters with **higher welfare practices** can position themselves as **premium suppliers** ahead of future EU regulatory tightening.

The EU’s internal inconsistency creates **competitive space** for third-country producers who adopt voluntary welfare standards.

Risks

The EU is clearly moving toward **stricter welfare rules**, especially for transport and slaughter.

Future EU legislation may impose **equivalence requirements** on imports (as already occurs with food safety, IUU fishing, and veterinary drugs).

Exporters relying on **ice-slurry asphyxiation**, high densities, or non-validated stunning methods may face **future non-compliance**.

1. Key Findings of the EU Report (Analytical Summary)

1.1. Regulatory Framework

The EU relies on **general animal welfare legislation**, not fish-specific rules:

Directive 98/58/EC → general farm animal protection

Regulation 1099/2009 → general killing rules, **no fish-specific stunning methods**

Regulation 1/2005 → transport rules, **limited fish guidance**

The report states that **Finland is the only country with detailed, enforceable fish welfare rules**, while most Member States rely on vague provisions such as “adequate water quality”.

Implication: The EU is aware of its regulatory gap and is preparing to close it. This will affect importers.

1.2. Official Controls

The report is explicit:

“Most national systems did not yet include routine, dedicated checks on fish welfare at farms or at slaughter.”

Controls are:

Rare at farm level

Minimal at slaughter

More common during transport

Highly variable between countries

Implication: The EU cannot yet enforce strict welfare requirements on imports—but is building the infrastructure to do so.

1.3. Industry, Research and Indicators

The EU aquaculture sector is developing:

Electrical stunning pilots (Spain, Greece)

Welfare indicators (Germany, Spain, Norway)

Digital monitoring (Norway)

Species-specific guides (APROMAR, FISHWELL)

But uptake is **inconsistent** and **non-mandatory**.

Implication: Future EU rules will likely draw from these tools → exporters must anticipate alignment.

1.4. Structural Challenges

The report identifies:

Lack of species-specific thresholds

Limited inspector training

Difficulty inspecting offshore farms

Climate-related stressors

High mortality events

Widespread use of **ice-slurry killing**, considered inhumane

Implication: The EU will regulate these gaps, and imports will be included.

2. Impact Analysis for Latin American Exporters

Latin America is a major supplier of **salmon (Chile), trout (Peru), tilapia (Brazil, Colombia), pangasius-type species (Ecuador), and marine species (Mexico, Central America)** to the EU.

Below is a **strategic impact assessment**.

2.1. Short-Term (2026–2028): Low Regulatory Pressure, High Market Opportunity

Why?

The EU currently lacks enforceable fish-specific welfare rules.

Official controls are inconsistent and mostly focused on transport.

No equivalence requirements exist for welfare in imports.

Opportunities for exporters

1. **Market access remains stable** No new welfare-based trade barriers in the immediate term.

2. **Competitive advantage for early adopters** Exporters adopting:

Electrical stunning

Validated welfare indicators

Low-stress transport

Mortality monitoring can differentiate themselves in EU retail and certification schemes.

3. **Premium positioning** EU retailers increasingly demand:

“Humane slaughter”

“High welfare aquaculture”

“Stress-free transport”

Latin American exporters can capture this segment before EU producers harmonise.

2.2. Medium-Term (2028–2032): Rising Regulatory Convergence Pressure

The EU is clearly preparing a **future regulatory package**:

The 2023 proposal to revise Regulation 1/2005 includes **specific provisions for aquatic animals**.

The new **EU Reference Centre for Aquatic Animals** will develop indicators and thresholds.

Member States are building welfare checklists and digital monitoring systems.

Expected EU moves affecting imports

1. **Mandatory stunning requirements** Likely ban on:

CO₂ stunning

Ice-slurry asphyxiation

2. **Species-specific welfare indicators** Exporters may need to document:

Mortality

DO levels

Temperature

Stocking density

Handling procedures

3. **Transport rules** Exporters of live fish (e.g., tilapia juveniles) may face:

Maximum densities

Oxygen thresholds

Temperature limits

4. **Equivalence requirements** Similar to:

IUU fishing regulation

Veterinary drug residue controls

Sanitary controls

The EU may require **proof of welfare compliance** for imports.

2.3. Long-Term (2032+): Welfare as a Non-Tariff Barrier

If the EU adopts a fish welfare regulation like terrestrial animals:

High-risk practices for exporters

Ice-slurry killing

High-density transport

Lack of validated stunning

Absence of welfare indicators

High mortality rates

Poor documentation of handling and water quality

High-risk species

Salmon (Chile)

Trout (Peru)

Tilapia (Brazil, Colombia)

Seabass (Mexico, Central America)

These species are already under scrutiny in EU NGO campaigns.

3. Strategic Recommendations for Latin American Exporters

3.1. Immediate Actions (0–2 years)

Map current practices vs. EU emerging expectations.

Adopt **electrical stunning** for salmonids and marine species.

Implement **mortality-based welfare indicators**.

Document water quality and handling procedures.

3.2. Medium-Term Actions (2–5 years)

Align with EU private standards (ASC, GlobalG.A.P., Friend of the Sea).

Develop species-specific welfare SOPs.

Train staff in welfare handling and humane slaughter.

3.3. Long-Term Actions (5+ years)

Prepare for **equivalence requirements**.

Engage with EU buyers to co-design welfare protocols.

Invest in digital monitoring (oxygen, temperature, behaviour).

4. Conclusion

The EU Overview Report reveals a **regulatory system in transition**. While current enforcement is weak, the direction is unmistakable: **fish welfare will become a central pillar of EU aquaculture policy**, and imports will eventually be required to comply.

For Latin American exporters, this is not a threat—it is a **strategic window**:

Early adopters will gain **market preference**,

Late adopters will face **non-tariff barriers**,

Countries that integrate welfare into their export model will secure **long-term EU access**.

Bibliographic reference:

<https://ec.europa.eu/food/audits-analysis/news/details/164>