



18/10/2023: GOOD HUSBANDRY PRACTICE WORKSHOP

Questions and comments

- Include a chapter on GHPs applicable to all species before the species-specific factsheets.
- Include text of legislative articles that are referred to.
- Factsheets should be made available also in digital formats, such as through apps.
- Some recommendations are too detailed - some are vague and open to interpretation. Need to decide on the level of detail for this work.
- Differentiate between husbandry and environmental practices.
- Fragmentary language and tone of the document, which includes direct quotes from the different documents. Need for harmonisation to distinguish between recommendations and obligations, ensuring clarity in the document's content.
- Translate documents in all EU languages.
- Shellfish producers work in the public domain of the EU, and the recommendations addressed to them in some cases concerns the lack of action from the MS in the areas of their responsibility (quality of water, marine pollution, etc.).
- Additional recommendations from the EU platform on animal welfare would be useful.
- Some clarifications would be needed regarding winter disease and the indication about the rapid temperature changes that are acceptable if they fall within the overall limits for the species. There seems to be some misinterpretation from the EFSA paper, as EFSA is explicit about the hazards associated with rapid temperature changes within overall acceptable ranges for winter disease, or there are conflicting recommendations.
- Certain parts of the written text exhibit confusion between actual practices and recommendations (as in the case of fish farming for Mediterranean fish species).
- If the document is meant to consider all stages of the life cycle, as stated in the introduction, this should be applicable to all species. Alternatively, it should be explicitly stated that the Good Practices are specific to certain stages.
- Sea bass and sea bream should be two separate factsheets.
- Specific practices are based on scientific knowledge, but impossible in practical ways (such as nutrition suggestions). On the other hand, there is practical knowledge and applicable solutions provided by private companies that could be included in the document.
- Factsheet should be published separately in order to make it practical and user-friendly for farmers.
- The [Council Directive 9858](#), which applies to fish, should be incorporated in the chapter of the mandatory legislation, as well as the [conclusions of the subgroup of Animal Welfare Platform on Fish](#). In DigiCenter, they have already planned a roadmap for EFSA opinions on different fish species in the future, with might contain useful elements to enrich the document before finalising it.
- Addition of a dedicated section on feed, separate from functional feed, given that functional feed is a very important strategy to reduce antibiotic usage and to, as a biosecurity.
- The addition of zooprophyllactic measures has not been addressed, particularly in the case of sea bream and sea bass aquaculture and for the economic survival of the farms.
- "harvesting and grading" should be retitled as "handling". "handling" is an area that has significant potential for practical advice and should be further elaborated in all the factsheets.
- "harvesting and grading" should be split.



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- Why the section on sea bream and sea bass is focused only on the growing phase in sea cages, neglecting the significance of lagoons or ponds, especially in many countries like Italy, Spain and Portugal.
- A proper definition of environmental enrichment is needed.
- Absence of predator control tools for farmers. Recommendation on predator control seems to be addressed to MS. Predator control should be considered in the context of farming the same species in different ways (e.g., sea bass in sea cages, sea bass in lagoons, etc.).
- Lack of specific information on shellfish on the harvesting, classification, vaccination and treatment.
- Absence of information about shellfish farming in general, and particularly about the fight against shellfish predators. As regards water quality, more information is needed, particularly about the duty of MS to restore it. Finally, mortality removal in the case of shellfish, especially in marine aquaculture, is impossible.
- Breeding should be considered prior to farming, but the two are linked. Incorporate breeding in the general part of the document and address specific breeding topics on a species-specific basis.
- Avoid generalisations and specific stages in the farming need to be considered.
- Disinfection and cleaning need more specification, as there is a big difference between disinfecting the system or disinfecting the incoming water in a hatchery or for live food production. It is also important to address microbial management in the document.
- Need for the diversification of recommendations based on different farming systems.
- Importance of implementing management practices to minimise the occurrence of escapes in trout and salmon.
- Challenges in defining stocking densities and the need to further explore this issue in the different species, as well as the design and maintenance of the facilities and equipment.
- The importance of the design of the facility should be emphasised. In the case of rainbow trout, environmental enrichment should be expanded. Many more examples, such as the use of hatching mats, in hatcheries, are available, and applicable on salmonids. The colour of the tanks and the rear units is also important, and may be linked into this general comment about the design of the unit. Over the past 15 years, there has been substantial publication about structural enrichment, like adding complexity or providing shelters for the fish. This is something that should be at least mentioned.
- Fish meal dependency ratio (page 32) should be presented as an environmental issue, not a husbandry issue. The fish feed must have the required level of essential amino acids, proteins for fish to grow and function correctly and therefore that's an environmental consideration and would be best put into the environmental practice section.
- Characterising sea lice treatments as always harmful to the welfare of fish would be inappropriate, given that all handling and treatments of fish have welfare implications.
- Avoiding AGD and zooplankton and phytoplankton by rearing fish in on-land systems is not appropriate either. This section needs to be revised.
- Issues of biosecurity, disinfection and cleaning, vaccination and treatments should be presented under the umbrella of prevention.
- Importance of looking at operational welfare and performance indicators in the farming process, which applies to most, if not all, species.
- Importance of guidelines for the responsible use of medicines in aquaculture.



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- The information about hatchery and the ponds should be further developed, the water parameters need to also tackle RAS systems and tanks and that following doesn't regard sea cages.
- Need to provide specific information on shellfish farming practices, and to highlight the importance of water quality due to the specific characteristics of the sector.
- It would be useful to have a factsheet on flatfish in the future.
