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Chair

Aquaculture Advisory Council

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Charlina Vitcheva

Director General DG MARE

European Commission

Brussels, Belgium

Brussels, 18 December 2025

Subject: Reply to the European Commission's answer to the AAC Recommendation on molluscan welfare

Dear Mrs Vitcheva,

Thank you for your letter dated 13th January 2025 responding to the AAC recommendation on molluscan welfare.

We welcome the fact that animal welfare is considered an important aspect of the strategic guidelines and the setting up of EURCAW-aqua. We look forward to the development of the EFSA roadmap and call for the inclusion of major reports on the welfare of aquatic animals.

We note:

- That you agree there is currently limited evidence relating to the sentience of bivalves
- That research into this issue is not in scope for EURCAW-aqua
- That the EFSA mandate has been agreed, but that there is no mention of bivalve sentience or welfare
- That the strategic guidelines include support for the development of low trophic aquaculture

The AAC welcomes the EC position supporting the development of the low trophic Aquaculture sector.

We suggest it follows that, as part of an holistic and integrated approach to the development of low trophic aquaculture, with high standards of animal welfare and environmental protection and improvement, the Commission develops a strategy to assess the evidence for and likelihood of sentience of all animals reared for food with a view to determining welfare priorities. A clear priority would be to research the sentience of bivalve molluscs, over 10 billion of which are farmed for food in the European Union each year.

We request that the Commission outlines how a strategy for assessing the sentience of aquatic animals reared for food, including bivalves, should be accomplished.

We would be grateful if a meeting could be set up between the AAC and the Commission to discuss this further.

Yours sincerely,

Brian Thomsen

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