# Technical Circular No. 0326

## Friend of the Sea – Fish Welfare Standard for Aquaculture

**Subject:** reclassification of requirements 28.1 and 28.2 as Recommendations and transitional acceptance of ice as a stunning method

**To:** Certification Bodies (CBs), auditors, certified companies and applicants for Friend of the Sea Fish Welfare – Aquaculture certification

**Date of issue:** 18 November 2026

## 1. Scope

This circular applies to all Friend of the Sea Fish Welfare Standard checklists for aquaculture (FOS-Aqua – Fish Welfare): *Acipenser baerii, A. gueldenstaedtii, A. naccarii, A. ruthenus, A. stellatus, A. transmontanus, Argyrosomus regius, Dentex dentex, Dicentrarchus labrax, Diplodus puntazzo, Huso huso, Liza ramada, Mugil cephalus, Oncorhynchus mykiss, Rachycentron canadum, Salmo carpio, Salmo salar, Salmo trutta, Salvelinus alpinus, Salvelinus fontinalis, Scophthalmus maximus, Seriola dumerili, Seriola lalandi, Sparus aurata*.

## 2. Reclassification of requirements 28.1 and 28.2

In Section 28 – Harvesting, Stunning and Slaughter, the following requirements are changed from **Important** to **Recommendation**. The wording of the requirements remains unchanged.

| No. | Requirement | Previous level | New level |
|---|---|---|---|
| 28.1 | Harvesting can only be performed using fish pumps. The dimensions of pumps and tubes must be scaled to the operation and approved by an engineer. The maximum flow rate should be 3 m/s. | Important | **Recommendation** |
| 28.2 | The only permitted stunning and subsequent killing methods are: a) an effectively applied percussive blow; b) electronarcosis followed by bleeding, asphyxia or other slaughter method that must be applied while the fish are unconscious; c) electrocution (i.e., killing by electrical current). | Important | **Recommendation** |

Consequently, in line with the definition of Recommendations given in the checklists:

- failure to comply with requirements 28.1 and 28.2 is no longer a minor non-conformity and does not prevent certification from being granted or maintained;
- auditors shall still verify these requirements during the audit and report any non-compliance in the audit report as a "recommendation";
- at the following audit, the company shall inform the CB of any measures implemented.

## 3. Use of ice as a stunning method

Friend of the Sea recognises that, for several species and production settings, concrete and economically feasible alternative stunning systems are not yet available at commercial scale. Therefore, **the use of ice (including ice slurry) will be considered acceptable as a stunning method until concrete and feasible alternative solutions become available.**

Where ice is used:

- the auditor shall record the stunning and slaughter method used in the audit report;
- the written procedure for stunning and slaughter (requirement 28.8) shall describe the method actually applied;
- the requirements on staff training (28.6), the person responsible for welfare (28.7) and video recordings (28.9) continue to apply;
- the company is encouraged to assess and, where possible, trial more welfare-friendly stunning methods, such as those listed in requirement 28.2.

Friend of the Sea will periodically review this position in light of technological and scientific progress. Any change will be communicated through a new circular, which will provide an adequate transition period.

## 4. Unchanged requirements

All other requirements of Section 28 (28.3 – 28.9) and of the other sections remain unchanged. The reference to requirements 28.1 – 28.4 in requirement 28.8 shall be understood as the obligation to have a written procedure describing the harvesting, stunning and slaughter methods actually used.

## 5. Entry into force

This circular enters into force on the date of issue and applies to all audits carried out from that date. Non-conformities against requirements 28.1 and 28.2 already raised and not yet closed are reclassified as recommendations. The checklists will be updated at their next revision.

For any clarification, please contact the Friend of the Sea Scientific Department.

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