



6th October 2023

To: **TBC**

Stella Kyriakides, Commissioner for Health and Food Safety  
Virginijus Sinkevičius, Commissioner for the Environment, Oceans and Fisheries  
European Commission Berlaymont, Rue de la Loi 200 1049 Brussels

Cc: **TBC**

Andrea Gavinelli, DG SANTE, Head of Unit, DDG2.G.5  
João Aguiar Machado, DG MARE, Hors Classe Adviser  
Ester Alaez Pons, DG SANTE, Policy Officer, SANTE.G.3  
Valerie Tankink, DG MARE, Head of Unit, MARE D3  
Felix Leinemann, DG MARE, Head of Unit, MARE.A.2  
Cristina Costa Salavedra, DG Recover, Policy Officer, SG.RECOVER.B.1  
Giulio Federico, DG Recover, Head of Unit, SG.RECOVER.B.1

**Subject: Opening of an octopus farm in the Canary Islands, Spain**

Dear Commissioners Kyriakides and Sinkevičius,

Dear Mr Gavinelli, Mr Aguiar Machado, Ms Alaez Pons, Ms Tankink, Mr Leinemann,  
Ms Costa Salavedra, Mr Federico,

The Spanish Party for the animals PACMA, together with the undersigned parties and organisations, hereby call on the European Parliament to ban the production and import of captive-bred octopuses in the European Union.

This concern, which we have previously expressed to you, is in relation to the opening of an octopus farm, which the company Nueva Pescanova plans to locate in the Canary Islands, Spain, for the farming of one million octopuses per year.

Since the media echoed the news around the world, the most relevant organizations for the defense of the welfare and protection of animals and the environment, as well as a large part of the scientific community, have condemned the suffering and mistreatment that the opening of this farm for octopuses would imply, as well as the environmental

damage. Furthermore, the plans for this farm have caused a growing and majority social rejection at international level.

As Dr. Elena Lara, head of research at Compassion In World Farming International has stated, there are serious sustainability and animal welfare problems related to the development of this activity. In her report *Intensive Octopus Farming: A Recipe for Disaster*, which we are enclosing with this letter, she highlights, from a scientific perspective, the serious consequences that octopus farming would have, given that these are highly intelligent, sensitive and curious animals, and keeping them in tanks would be extremely cruel. Condemning these animals, which are solitary by nature, to live in overcrowded tanks would cause them an unimaginable suffering.

Recently, Jonathan Birch, an associate professor at the London School of Economics, conducted a review of more than 300 scientific studies showing that octopuses feel pain and pleasure, which resulted in them being recognized as sentient beings under the UK Animal Welfare Act from 2022.

Birch and the co-authors of the review have stated that it is impossible to breed octopuses with a relative level of welfare, since keeping a large number of octopuses together would generate stress, conflict and high mortality. They also argue that neither the method of slaughter proposed by Nueva Pescanova's project - in ice sludge - is acceptable, nor is the mortality rate of 10 to 15%.

Jakob Vinther of the University of Bristol, has stated that octopuses are "an example of an organism that has evolved to have intelligence comparable to our own. Their problem-solving skills, joy and curiosity are very similar to those of humans".

As with Lara, Birch and Vinther, several other scientists are expressing their concern and objection to the Nueva Pescanova project, from all over the world.

At an environmental level, in order to feed these animals in farms, either with natural live or frozen food, or with fishmeal and fish oil, it would be necessary to catch a large amount of crustaceans and fish, which would put additional unsustainable pressure on the already diminished populations of these species, in addition to the overfishing that our threatened oceans are already facing.

Jacquet et al. (2019) reported that octopuses eat three times their own weight in food, which means that aquaculture based on carnivorous species is not a solution to protect

the marine environment, as companies such as Nueva Pescanova try to make us believe, but would actually aggravate the existing problem.

The multinational company told the BBC that "The welfare standards required for the production of octopus or any other animal on our farms guarantee the correct handling of the animals".

We question to what "required welfare levels" do they refer, when there is no legislation, neither in Spain nor in the European Union, that regulates the welfare of octopuses or other cephalopods in farms and establishes any requirements.

Directive 2010/63/EU was the first legal text in which the European Union acknowledged expressly the sentience of cephalopods, granting them, for the first time, some kind of protection, although only in the field of experimentation.

This Directive marked a turning point in animal welfare legislation in the EU as it was the first time that a class of invertebrates was protected. The reason for including them in its scope of application was, according to the 8th recital of the same, the existence of scientific evidence that proves the capacity of these animals to "experience pain, suffering, distress and lasting harm".

Among the reasons why researchers have concluded that cephalopods have the ability to feel pain, it is usually highlighted that they have complex brains, whose size, compared to their body, is comparable to that of some vertebrates, with a complex brain structure, a large brain development, a diverse variety of neurotransmitters, and a vertical lobe, similar to that of the human hippocampus, which allows them to learn and memorize.

Octopuses show their personalities, they play, explore and solve problems. Moreover, there is behavioral evidence that cephalopods have a conscience, being able to exteriorize even disappointment.

More than a decade after the above mentioned Directive, and in view of the abundant scientific evidence, we are at an undelayable and urgent moment to protect these animals from exploitation, abuse and mistreatment.

This is why we request the European Parliament to adopt the necessary measures to ban the growing and fattening of octopuses and other cephalopods in farms.

We would also like to take this opportunity to request protection for crustaceans intended for human consumption, by not allowing them to be kept on ice and/or with their claws tied, and to be boiled alive.

We hope that the European Union to move towards the construction of a more ethical, fair, respectful and empathetic society, also with animals, which would be in clear contradiction with the implementation of projects such as the octopus farm in the Canary Islands. It is time for the protection of animals and the environment to be above the economic interests of corporations, and for us to amend and not make the mistakes of the past again.

Yours sincerely, on behalf of PACMA and the signatories listed below.

Ana Béjar

PACMA's board of directors

