

13th December 2024

To: Fernando Torija: madrid@eib.org

Cc: Inspectorate General, Complaints Mechanism: complaints@eib.org

Dear Mr. Torija,

We are writing on behalf of Aquatic Life Institute (ALI) and 140 members of the Aquatic Animal Alliance (AAA) to raise significant concerns regarding the European Investment Bank's (EIB) approval of project [20230639](#), which allocates 35 million € in quasi-equity/venture debt to Oceanloop Management GMBH for a large-scale shrimp farming operation in the Canary Islands (Spain).

The project was approved on June 11, 2024, yet it was not disclosed until October 10, 2024 - four months later. This significant delay denied stakeholders the opportunity to provide input and undermines the principles of transparency and accountability central to the EIB's disclosure guidelines. We ask for clarification on how this omission aligns with the EIB's commitment to open and inclusive decision-making processes.

Despite its significant biodiversity, climate, social, and animal welfare impacts, this project has not been assigned a high-risk categorization. Industrial animal agriculture projects, particularly those involving the intensive farming of aquatic animals, must always be categorized as high risk due to their inherent challenges, as detailed below.

The stated project objective is to "*deliver the common good of providing a healthy and sustainable source of protein while respecting animal welfare and minimizing environmental footprint.*" However, no specific details have been provided on how these claims will be achieved. Without such details, the credibility of these objectives is questionable.

The highly intensive farming of omnivorous aquatic species, such as shrimp, directly contradicts the [EU's strategic guidelines for a more sustainable and competitive aquaculture sector](#). These guidelines emphasize the need to move away from the intensive farming of species that heavily rely on fish meal/fish oil due to their disproportionate environmental and ethical impacts. This project's focus on industrial-scale production of shrimp appears to neglect these principles.

The production of 2,000 tonnes of shrimp annually necessitates substantial feed inputs, which are notoriously challenging to source sustainably. Recirculating aquaculture systems (RAS), such as those proposed for this project, are [highly energy-intensive](#), with energy use reported to be [5 to 25 times higher](#) than other aquaculture systems, further exacerbating the carbon footprint.

Shrimp farming under intensive, barren, and unnatural conditions raises profound welfare concerns. These systems expose animals to high levels of stress, leading to elevated mortality rates. Common welfare issues in shrimp farming include high stocking densities, un-ionized

ammonia, and low dissolved oxygen levels, with [studies](#) indicating that farmed shrimp endure an estimated 157 hours in disabling-equivalent pain. Furthermore, the prophylactic use of antibiotics, prevalent in the shrimp industry, [contributes to antimicrobial resistance](#) (AMR), posing serious risks to human and environmental health.

The project fails to disclose critical information about its practices to mitigate these concerns.

Specifically, there is no information provided on:

- Plans for environmental enrichment to alleviate the stress caused by barren farming conditions.
- Contingency plans to address high mortality events.
- Humane stunning and slaughter methods to ensure welfare standards during harvest.

We urge the EIB to:

- 1) Ensure all industrial animal agriculture projects, including those involving shrimp farming, are disclosed prior to approval to allow adequate consultation periods and address the ongoing concerns about the lack of proactive public information and engagement regarding these issues.
- 2) Categorize all industrial animal agriculture projects as high risk to reflect their substantial biodiversity, climate, social, and animal welfare impacts.
- 3) Require detailed disclosures on how the project plans to achieve its stated commitments to minimizing environmental impact and respecting animal welfare, including specific plans for environmental enrichment, mortality management, and humane stunning and slaughter.

These steps are critical to ensure that EIB-funded projects adhere to the highest standards of transparency, sustainability, and ethics, aligning with EU guidelines and promoting truly sustainable aquaculture practices.

We look forward to your response and trust that these concerns will be addressed with the urgency they warrant.

Kind regards,

Giulia Malerbi
Head of Global Policy
Aquatic Life Institute

Signatories

Aquatic Life Institute
Acción Océanos
Action for Protection of Animals Africa

Action For Dolphins
AEL Advocacy
Africa Network for Animal Welfare USA
African Marine Mammal Conservation Organization
Alexandria Turtle And Wildlife Rescue
Alianima
Angolan Vegetarian Association
Anima International
Anima Naturalis
ANIMAL
Animal Advocacy Africa
Animal Advocates International
Animal Empathy Philippines
Animal Equality
Animal Friends Croatia
Animal Justice Canada
Animal Interfaith Alliance
Animal Kingdom Foundation
Animal Law Italia
Animal Libre
Animal Nepal
Animal Policy International
Animal Rights Center Japan
Animal Rights Initiative
Animal Society e.V.
Animals Aotearoa
Animals Don't Speak Human
Animal Welfare Advocates Association the Gambia
Animal Welfare and Environment Network for Tanzania
Animal Welfare Concern
Animal Welfare Institute
Animal Welfare Observatory
Animals Australia
Animals Now
Apon Welfare
ARAF-PLATEAU DOGON
ARBA
Arusha Society for the Protection of Animals
Aware
Catholic Concern for Animals
Congo Basin Conservation Society CBCS-Network
Coalition of African Animal Welfare Organisations
Compassion in World Farming
Conservative Animal Welfare Foundation

Crustacean compassion
The Dark Hobby
Depana
Deutscher Tierschutzbund
Dharma Voices for Animals
Dieren Bescherming
Djurens Rätt
Dyrenes Alliance
Environmental and Animal Society of Taiwan (EAST)
Education for African Animals Welfare
Essere Animali
Estonian Union for the Protection of Animals (MTÜ Eestimaa Loomakaitse Liit)
Ethical Farming Ireland
Eurogroup for Animals
FAADA
Farmállatvédelem
Feedback Global
Fish Welfare Initiative
F.R.E.E
Fórum Animal
Friends of Phillip
Fundacion defensa y derecho animal
Fundación Veg
Future For Fish
Ghana Animal Welfare Society
Green REV Institute
Humane Africa Trust
The Humane Global Network
The Humane League
Humáunny pokrok
In Defense of Animals
Institute of Animal Law Asia
Invisible Animals (Nevidimi Zhivotni)
Kitwe Animal Welfare Society
Kurdistan Organization for Animal Rights Protection
KYMA sea conservation & research
L214
Lady Freethinker
The Last Cage
Lever
Life of Pachamama
Lilongwe Society for Protection and Care of Animals
Luv 4 all: Uganda
Meru Animal Welfare Organization

National Council of SPCAs
Nepal Animal Welfare and Research Center (NAWRC)
New Roots Institute
Nurture Imvelo Trust
Oikeutta eläimille
OIPA - International Organization for Animal Protection
One Health and Development Initiative
ONG Sante Animale Afrique (SAA)
Podrska foundation
Plataforma ALTO
Planet For All
Protección Animal Ecuador (PAE)
Proyecto ALA
PAZ
RENTAS
Rwanda Animal Welfare Organization (RAWO)
SAFCEI
SAFE (Save Animals from Exploitation)
Samayu
Sea First
Seastemik
Sentience
Sentient Media
Shellfish Network
Sibanye Animal Welfare and Conservancy Trust
Sinergia Animal
Somali Animal Welfare Society (SAWS)
Sống Thuận Chay
SPCA Montreal
SPCA New Zealand
SPCA Selangor
Tanzania Animals Protection Organization
Tanzania Animal Welfare Society (TAWESO)
Terranimal Ecuador
Tikobane Trust
Todos Somos Animales
Tourists Against Trophy Hunting
University of Guilan
Uganda vegan society
Utunzi Animal Welfare Organization
Vegan Planet Africa
Vege zajednica
Vissenbescherming
Vivamar Society

Voices for Animals

Voters for animals rights

We Animals

Welfare Footprint Project (Center for Welfare Metrics)

West Africa Centre for the Protection of Animal Welfare (WACPAW)

WTS