

Haarlem, 31st of August 2018

Subject: Response to SeaChoice at the Living Oceans Society

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Dear Kelly,

Many thanks for taking the time to provide your comments on the GSSI Benchmark Report for the ASC Salmon Standard.

GSSI is committed to a transparent benchmark process with opportunity for engagement and comments. Following the consultation, GSSI's detailed response to your comments by component number raised in relation to the GSSI Benchmark of the ASC Salmon Standard is set out below.

Section A - Governance

Essential Component A.1.06

The Scheme Owner requires that stakeholders have the opportunity to participate in or provide direct input to the top governance body.

SeaChoice comment: : Evidence for this EC includes “the provision” of a Stakeholder Advisory Group (SAG) within the ASC’s deed. In 2011, the ASC identified the creation of a SAG as a priority. However, seven years later, no SAG has been formed. SeaChoice’s 2017 report, Aquaculture Stewardship Council (ASC) Certification in Canada: Technical Report, provided the following recommendation to the ASC:

“Establish a Stakeholder Advisory Group that represents a diverse range of stakeholders. The SAG would allow the opportunity for stakeholders to raise concerns and critical issues to the TAG and ASC Supervisory Board.”

The ASC provided the following response:

“The ASC Technical Advisory Group (TAG) has a dual function and currently provides both The ASC Supervisory Board technical and stakeholder feedback. is investigating next steps for the formation of a SAG. This review will also cover possible future interactions of the SAG with both the TAG—which would then shift focus to a purely technical advisory body— and Supervisory Board.”

Relying on the provision of a SAG for this EC’s alignment is inappropriate - given it remains unclear whether a SAG will be formed. While the governance bodies (Supervisory Board and Technical Advisory Group) composition is diverse, it remains a challenge for other stakeholders to access and provide direct input to the top governance bodies. The cited ASC ‘Provide Input’ webpages do not overcome this challenge. Instead, these detail how “interested parties can provide their feedback on ASC standard in development and farm audits”, along with providing the ASC complaints procedure. From an active ASC stakeholder point of view, public information on how stakeholder can provide direct input to the governance bodies (e.g. online submission), as well as the fruition of a SAG, is what is needed to for the ASC to appropriately meet the intent of the EC. Report Reference: <http://www.seachoice.org/wp-content/uploads/2017/09/ASC-SeaChoice-Technical-Report-FINAL.pdf>

GSSI response: ASC is in alignment with Essential Component A.1.06. Based on the comment of SeaChoice, additional evidence has been included in the final conclusion.

Essential Component A.1.06 focuses on the opportunity for stakeholders to participate in OR provide direct input to the top governance body, which is clearly demonstrated in the conclusion. In addition to this, ASC has demonstrated evidence, by means of minutes of meetings, that the ASC's top governance body has discussed the input provided by Sea Choice, thereby proving that stakeholder can provide direct input to the ASC top governance body. Additionally, setting up a Stakeholder Advisory Group (SAG) is not a specific requirement for alignment with A.1.06.

It was established at the Office Visit that the opportunity to participate in, or provide direct input to the top governance body, can be adequately achieved through existing processes. During the Office Visit in early October 2017, it was considered that the diversity of the governance bodies (the Supervisory Board and Technical Advisory Group) is such that there is a wide profile of different organizations (NGOs, industry, scientists) represented on these governance bodies and there was appropriate provision of stakeholder input to these governance bodies by online submission and internal processes.

There is provision of online comment on <https://www.asc-aqua.org/what-you-can-do/participate/how-you-can-participate/> and <https://www.asc-aqua.org/what-you-can-do/participate/provide-input/>. Within these web pages there is the clear provision of a telephone number and e mail address as well as defined complaints and objections procedures and an ASC Whistle Blowing Policy. For both procedures, there is direct involvement with the Supervisory Board.

Additional evidence of alignment with this component was provided in the form of a recent TAG meeting (ref TAG13_Agenda_Final.docx , confidential), where the TAG discussed recent stakeholder activities/ campaigns and responses from organisations such as Seachoice, Environment Tasmania and Oxfam Novib. Evidence was also provided of the internal debrief of this meeting by Michiel Fransen in an e mail dated 1st July 2018.

Conclusion on GSSI Essential Component A.1.06

Conclusion: The ASC Salmon Standard is in alignment because there is provision of a Stakeholder Advisory Group within the Deed Stichting ASC Foundation Page 10 and within ASC Regulations for Supervisory Board Section 6.

As well, there are differing types of stakeholders on Boards and Committees e.g. Supervisory Board 2 Industrial Reps and 5 Non Industry Reps, TAG 1 Industry Rep, 3 Non Industry Reps and 3 others . TWG on Group Certification Requirements 1 Industry Rep, 4 Non Industry Rep and 1 other and Steering Committee for Feed Standard Development 10 Industry Reps and 5 Non Industry Reps. <https://www.asc-aqua.org/about-us/governance/>

Additionally, there is a section on the website which facilitates and encourages active participation of stakeholders <https://www.asc-aqua.org/what-you-can-do/participate/> and <https://www.asc-aqua.org/what-you-can-do/participate/provide-input/>

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References:

- 1) Deed Stichting ASC Foundation
- 2) ASC Regulations for Supervisory Board
- 3) <https://www.asc-aqua.org/about-us/governance/>
- 4) <https://www.asc-aqua.org/what-you-can-do/participate/>
- 5) <https://www.asc-aqua.org/what-you-can-do/participate/provide-input/>
- 6) Draft Minutes of the Supervisory Board Meeting held on 18th and 19th April 2018, minute 5, entitled TAG Governance and Stakeholder Advisory Board Group (confidential)
- 7) ASC TAG TOR and Rules v.1.0 Sept 27, 2012, Page 2
- 8) TAG13_Agenda_Final .docx , (confidential)
- 9) E mail of debrief of this meeting TAG-13 by Michiel Fransen dated 1st July 2018 (confidential).
- 10) SB34-DRAFT minutes-v.2.0 to SB.docx, (confidential)

Essential Component A.1.07

The Scheme Owner has a defined scope for certification under its scheme.

SeaChoice comment: ASC's definitions of Unit of Certification (UoC) are ambiguous, not explicit. The Certification and Accreditation Requirements (CAR) version 2.1 states the following UoC definition:

"The operation that is covered by a certificate. It includes all production and processing sites including the receiving water bodies, any harvest sites such as production ponds, and all storage or processing operations (including subcontracted operations) up to the point where the product enters further chain of custody."

The Salmon Standard version 1.1 states the following UoC definition:

"The unit of certification is a farming site, which in practice means a cluster of cages located together in an operational unit. In undergoing assessment for certification, a company that owns multiple grow-out sites will be subject to compliance only at the particular site(s) for which they choose to undergo certification. A farm must comply with all the requirements in the ASC Salmon Standard to be certified, including providing required documentation from their feed and smolt suppliers."

This conflicting language has led to auditing practices that omit intermediary stages of the production cycle from Standard compliance. SeaChoice's report, What's Behind the Label? Assessing the Impact of MSC and ASC Seafood Certifications in Canada, found up to a year of the production cycle of an ASC farmed salmon may never be assessed – despite a number of Standard indicators requiring full production cycle's data and evidence. For example, antibiotics and parasiticide use counts.

The following response to the issue should be included as evidence for this EC: <http://variance-requests.asc-aqua.org/questions/are-smolts-that-are-temporarily-held-in-saltwater-pens-but-are-not-yet-in-final-stage-grow-out-sites-within-scope-of-the-requirements-of-the-asc-salmon-standard-v1-0-1-1-if-so-which-princip/>

As acknowledged by the ASC, the Salmon Aquaculture Dialogue intended for the UoC to be assessed for compliance against the complete production cycle. The ASC's current UoC definition(s) needs to be improved to be explicit of the intention of the Dialogue. Report Reference: <http://www.seachoice.org/our-work/eco-labels/whats-behind-the-label-report/>

GSSI response: ASC is in alignment with Essential Component A.1.07. Based on the comment of SeaChoice, additional clarification and evidence has been included in the final conclusion.

ASC has stated that they have embarked upon the alignment of documentation which will involve interpretation for the definition of Unit of Certification in the CAR in the coming months.

To assist with further clarification, other information has been provided on the ASC Interpretation Platform regarding specific requirements relating to smolts temporarily held in saltwater and the requirements of the ASC Salmon Standard (Q&A11 question from SCS Global Services 13/12/2017, effective date 14/02/2018).

Conclusion on GSSI Essential Component A.1.07

Conclusion: The ASC Salmon Standard is in alignment because the series of standards are explicit to species and types of certification.

The rules are clearly defined within the main document regarding certification and Accreditation under section 17 Unit of Certification Page 20 (ASC Certification and Accreditation Requirements V.2.).

Within each species standard the scope of certification is clearly defined, examples are ASC Salmon Standard_v1.1 April 2017 Page 13 section Scope of Standard and ASC Tilapia Standard_v1.1 April 2017 Page 10.

ASC has stated that they have embarked upon the alignment of documentation which will involve interpretation for the definition of Unit of Certification in the CAR in the coming months.

Other information has been provided on the ASC Interpretation Platform regarding specific requirements relating to smolts temporarily held in saltwater and the requirements of the ASC Salmon Standard (Q&A11 question from SCS Global Services 13/12/2017, effective date 14/02/2018).

References:

- 1) ASC Certification and Accreditation Requirements V.2
- 2) ASC Certification and Accreditation Requirements V.2.1 August 2017, Section 17.1, Page 21 and Annex A The ASC Vocabulary Page 47
- 3) ASC Salmon Standard_v1.1 April 2017 Page 12
- 4) ASC Tilapia Standard v1.1 April 2017

5) <http://variance-requests.asc-aqua.org/questions/are-smolts-that-are-temporarily-held-in-saltwater-pens-but-are-not-yet-in-final-stage-grow-out-sites-within-scope-of-the-requirements-of-the-asc-salmon-standard-v1-0-1-1-if-so-which-princip/>

Essential Component A.3.13

The Scheme Owner allows a period of at least 60 days for the submission of comments on the draft standard.

SeaChoice comment: As identified in the GSSI benchmark report, the ASC states the public consultation period may be 30-60 days. However, the GSSI report also states “... there have been no instances of a reduction and it was stated that a reduction would only take [p]lace if there were little or no comment on the initial consultation”. To the contrary, we submit the Operational Review of the Salmon Standard – PTI second public consultation was reduced to 30 days: <https://www.asc-aqua.org/what-we-do/programme-improvements/operational-review-salmon-pangasius-tilapia-standards/>

This was despite a very active initial consultation yielding nearly 30 specific comments by 13 different stakeholders: <https://www.asc-aqua.org/wp-content/uploads/2017/07/Operational-Review-three-papers-Stakeholder-Submissions.xlsx>

GSSI response: ASC is in alignment with Essential Component A.3.13. Based on the comment of SeaChoice, additional clarification and evidence has been included in the final conclusion.

The GSSI requirement is to allow a period of at least 60 days for the submission of comments on the draft standard and in the case of the ASC Salmon Standard, this was fully fulfilled by two consultation periods of total duration of 77 days.

Conclusion on GSSI Essential Component A.3.13

Conclusion: The ASC Salmon Standard is in alignment because ASC Standard Setting Procedure_v.1.0 section 8.6.11 states the public consultation period (30-60 days). Also, there is a second public consultation which if added together gives a total of at least 60 days.

However in ASC Standard Setting Procedure_v.1.0 section 8.8 the second consultation may be skipped or period shortened. It was found during the Office Visit that there had been no instances of a reduction and it was stated that a reduction would only take place if there were little or no comment on the initial consultation.

The GSSI requirement is to allow for a 60 days period for comment submission. This is fulfilled because any draft standard has two consultation periods of at least 30 up to 60 days. This results in a public comment period of 60 to 120 days.

This approach is reasonable and meets GSSI requirements regarding 60 day rule, but the wording and clarity of ASC Standard Setting Procedure_v.1.0 could be improved.

References:

1) ASC Standard Setting Procedure_v.1.0 section 8.6.1, section 8.6.1 and 8.9

2) Example Feed Standard

<https://www.asc-aqua.org/what-we-do/our-standards/feed-standard/> section Timelines and Important Dates

3) <https://www.asc-aqua.org/what-we-do/programme-improvements/operational-review-salmon-pangasius-tilapia-standards/op>

Essential Component A.3.15

The Scheme Owner ensures that interested parties can participate in the standard-setting process through a consultation forum or are made aware of alternative mechanisms by which they can participate.

SeaChoice comment: The ASC's variance process overrides the multi-stakeholder agreements made in the Salmon Aquaculture Dialogue. In practice, the process allows for the Variance Request Committee (composed of the ASC Standards Director, Chair of the ASC TAG, Chair of the ASC Supervisory Board and ASC's CEO) to approve new requirements, in lieu, of those written in the Standard: <https://www.asc-aqua.org/what-you-can-do/get-certified/about-our-certification/>

We submit the variance process parallels a standard-setting process. The process currently lacks stakeholder engagement or consultation: <http://www.seachoice.org/our-work/eco-labels/asc-variances-and-process/>

GSSI response: ASC is in alignment with Essential Component A.3.15. Based on the comment of SeaChoice, additional clarification and evidence has been included in the final conclusion.

This draft revised variance request process has been reviewed by the IE; stakeholder consultation will take place when the Variance Request Committee has made a decision that a variance is required; this is after review with the applicant and appointed technical experts. The decision will be posted for comment as part of a draft audit report public comment period. Stakeholders shall be encouraged to raise any points of disagreement or add references to relevant material.

We would also point to the ASC Interpretation Platform (ref <http://variance-requests.asc-aqua.org>) and the significant number of variance requests reviewed and dealt with 277 requests between 16/9/2012 to 29/6/2018 (Variance Requests- 20180703-1.xlsx) and the number of questions and answers dealt with 49 between 3/1/2017 and 20/6/2018 (QAs-20180703.xlsx). There is proactive engagement with stakeholders given the process of application and dialogue with applicants during the process.

It is concluded that the ASC is in alignment with GSSI requirements.

Conclusion on GSSI Essential Component A.3.15

Conclusion: The ASC Salmon Standard is in alignment because ASC have a number of mechanisms allowing stakeholders to participate in the consultation process. This is clearly defined within ASC Standard Setting Procedure_v.1.0 sections 8.6.3, 8.6.4 and 8.6.5.

[Stakeholder consultation will take place when the Variance Request Committee has made a decision that a variance is required; this is after review with the applicant and appointed technical experts. The decision will be posted for comment as part of a draft audit report public comment period.](#)

Stakeholders shall be encouraged to raise any points of disagreement or add references to relevant material.

References:

- 1) ASC Standard Setting Procedure_v.1.0
- 2) <https://www.asc-aqua.org/what-you-can-do/participate/support-us/>
- 3) <https://www.asc-aqua.org/what-you-can-do/participate/provide-input/>
- 4) <https://www.asc-aqua.org/what-you-can-do/participate/support-us/>
- 5) <https://www.asc-aqua.org/what-you-can-do/participate/provide-input/>
- 6) ASC Certification and Accreditation Requirements v 2.1 August 2017, Page 77
- 7) ASC Variation Request (VR) Procedure Draft V0.1 section 5.9 page 6, Confidential
- 8) <http://variance-requests.asc-aqua.org>
- 9) Variance Requests- 20180703-1.xlsx
- 10) QAs-20180703.xlsx

Section B – Operational Management

Essential Component B.2.06

The Scheme Owner ensures that accredited certification bodies have consistent documented procedure(s) that specify the conditions under which certification may be suspended or withdrawn, partially or in total, for all or part of the scope of certification.

SeaChoice comment: SeaChoice’s report, What’s Behind the Label? Assessing the Impact of MSC and ASC Seafood Certifications in Canada, found farms in major non-compliance to the Standard can sell their product as ASC certified. This suggest ASC’s suspension and revocation rules are inadequate and/or underused.

More specifically, CARv2 guidance states: “The CAB shall suspend the certificate if a major non-conformity remains open after six (6) months and follow requirement in Section 7.6 of this document.” This guidance reinforces that farms in major non-conformity which would have prevented their initial certification, can harvest and sell their product as ASC certified during the six-month period.

The CAR also falls short of providing guidance on when the decision to withdraw a client’s certificate is necessary and when the CAB should take action. Furthermore, there is no guidance or rules for when a suspension should progress into a withdrawal (revocation) of the certificate.

GSSI response: : ASC is in alignment with Essential Component B.2.06. Based on the comment of SeaChoice, additional clarification and evidence has been included in the final conclusion.

It should be pointed out that there are clearly defined actions regarding the suspension and withdrawal of certification within ASC Certification and Accreditation Requirements (CAR) v 2.1 August 2017, Page 15 section 7.6.

“7.6.1 A CAB may suspend or withdraw a certificate for a contractual or administrative reason.”

Also, ASC specified the conditions that lead to suspension of a certificate (CAR v 2.1 August 2017, Page 33 section 17.10.1.2 f)): “The CAB shall suspend the certificate if a major non-conformity remains open after six (6) months and follow requirement in Section 7.6 of this document.”

In addition to the requirements specified within CAR v2.1, ASC has provided clarification on suspension and withdrawal process on the interpretation platform. In relation to specific guidance of actual certification withdrawal, the main reason given for withdrawal by ASC is “normally the result of suspension if non-conformities are not closed in due time” (ref http://variance-requests.asc-aqua.org/questions/qa2_car_v-2-0_7-6/).

The decision to withdraw a certificate is that of the CAB and this concept is well understood by certified CABs, good examples of this are;

- the company fails to resolve issues that have resulted in the suspension in a defined timeline
- the company fails to meet the business contract with the CAB for Certification (e.g. failure to resolve non-conformities, not accepting on-going assessment visits, non-payment, misuse of logo, etc)
- the company ceases to provide the products within the scope of certification the client requests voluntarily to withdraw from the scheme.

Conclusion on GSSI Essential Component B.2.06

Conclusion: The ASC Salmon Standard is in alignment because not only is there an ISO 17065 requirement under section 7.11 but in addition with ASC Certification and Accreditation Requirements V.2 there is a section 7.6 which relates to suspension, cancellation or withdrawal of certification and procedures that must be followed. In relation to suspension post audit there is reference to suspension in the event that major conformities are not closed out after a six month period. It is the decision of the CAB to determine when suspension or withdrawal is warranted and there cannot be a list of the exact requirements when this can occur; this requirement is focused on the ISO 17065 section 7.11 which is more detailed.

Also, ASC specified the conditions that lead to suspension of a certificate (CAR v 2.1 August 2017, Page 33 section 17.10.1.2 f): "The CAB shall suspend the certificate if a major non-conformity remains open after six (6) months and follow requirement in Section 7.6 of this document."

Suspended farms are named on ASC website. If farms cannot address reasons of suspension, the certificate will be withdrawn, e.g. <http://asc.force.com/Certificates/ASCcertDetails?id=a0124000008RwkuAAC>. On the ASI website (<http://www.accreditation-services.com/archives/standards/asc>) there is a list of accredited CB's, Applicant CB's (1) and Terminated/Withdrawn CB's (3), providing evidence that ASI is pro-actively enforcing the implementation of the ASC Certification and Accreditation criteria.

References:

- 1) ISO 17065 7.11
- 2) ASC Certification and Accreditation Requirements V.2
7.6
- 3) ASC Certification and Accreditation Requirements V.2.1 August 2017,
Section 7.6 Page 15
- 4) ISO 17065:2012 section 7.11, page 18
- 5) http://variance-requests.asc-aqua.org/questions/qa2_car_v-2-0_7-6/
- 6) <http://asc.force.com/Certificates/servlet/servlet.FileDownload?retURL=%2FCertificates%2Fapex%2FASCcertDetails%3Ffid%3Da012400000KG32MAAT&file=00P1o000012JNarEAG>
- 7) <http://asc.force.com/Certificates/servlet/servlet.FileDownload?retURL=%2FCertificates%2Fapex%2FASCcertDetails%3Ffid%3Da0124000018u7aCAAQ&file=00P1o00000t959iEAA>
- 8) <http://asc.force.com/Certificates/servlet/servlet.FileDownload?retURL=%2FCertificates%2Fapex%2FASCcertDetails%3Ffid%3Da0124000008RwkuAAC&file=00P1o00000mu9TAEAY>

Essential Component B.2.14

For aquaculture, the Scheme Owner requires certification bodies to make summary audit reports publicly available (excluding commercially sensitive material) after certification has been granted.

SeaChoice comment: While Annex C of CARv2.1 instructs specific deadlines for CABs to publish reports, this is not always followed in practice. On review of the ASC platform, a total of 55 audit reports (i.e. assessments) were missing. For example, Pearson farm's certification is valid from 30 July 2015 to 30 July 2018. During this period, one initial audit and two surveillance audits should have been conducted. Only the initial audit report is available online (i.e. the two surveillance audit reports are not available as required by the CAR): <http://asc.force.com/Certificates/ASCCertDetails2?id=a0124000008Rwj8AAC>

In Canadian ASC certified farms, SeaChoice's experience has involved contacting the ASC directly on a regular basis to request surveillance audits which should be readily available on the website but are not.

GSSI response: : ASC is in alignment with Essential Component B.2.14. Based on the comment of SeaChoice, additional evidence has been included in the final conclusion.

ASC publishes the entire audit reports (both draft and final version) on its website. The deadlines are listed in Section 21 of the CAR (p.63).

ASC has a system of CAB performance monitoring and actively share data on a regular basis with ASI.

The requirements regarding reporting is clearly defined within CAR v.2.1 August 2017, Section 21, Annex C, Page 63 and are made known to ASI. Within any certification scheme, delay of submission of initial and surveillance audits does happen for various reasons and in many cases relate to supplier issues and not CAB issues, so management is important. Where issues need specific management, there are good examples where ASC has taken a pragmatic approach e.g. VR 158: Delay in performing surveillance audit (ref <http://variance-requests.asc-aqua.org/questions/vr-158-delay-in-performing-surveillance-audit/>) and Q&A20_CAR_v.2.0_17.10 regarding timing of non-conformance deadlines (ref http://variance-requests.asc-aqua.org/questions/qa20_car_v-2-0_17-1ff/). In case of a delay (due to audit date or any other change in the process), it also takes longer to publish the report.

The ASI Service and License Agreement, 29th August 2016, Section 5 Obligations of the Parties, Point 5.8 Page 9, Annex 2 Terms of Reference, Section 1.1.10 and 1.1.11 page 20, Annex 2 Section 4 Monitoring CAB and auditor performance, Page 21 and Annex 2 section 7 Information and data sharing, Page 22 provides the detail of how ASC and ASI interact regarding certification activity. In a Skype call between the IE and Boris Sulzberger (ASI Account Manager for ASC), the operational relationship between the two organizations was reviewed and it was deemed to be in alignment with the ASC/ASI Service Agreement.

Also, during the Office Visit a number of audit reports were reviewed from the ASC platform and no major issues found. However, further evidence has been sought regarding the CAB performance and control mechanism and have provided this evidence regarding a Non-conformity Report against a CAB raised by Antonio Hervas of ASI for non-submission of an audit report in British Columbia within the 90 days deadline (confidential).

Conclusion on GSSI Essential Component B.2.14

Conclusion: The ASC Salmon Standard is in alignment because there is a clear instruction regarding the publication of audit reports under ASC Certification and Accreditation Requirements V.2 annex C . There is reference to commercially sensitive information (C2.3).

References:

1) ASC Certification and Accreditation Requirements V.2

2) Sampled at random

<http://asc.force.com/Certificates/servlet/servlet.FileDownload?retURL=%2FCertificates%2Fapex%2FASCCertDetails2%3Fid%3Da0124000008RwmgAAC&file=00P2400000JFDW7EAP>

3) CAR v.2.1 August 2017, Section 21, Annex C, Page 63

4) VR 158: Delay in performing surveillance audit (ref <http://variance-requests.asc-aqua.org/questions/vr-158-delay-in-performing-surveillance-audit/>)

5) Q&A20_CAR_v.2.0_17.10 regarding timing of non-conformance deadlines (ref http://variance-requests.asc-aqua.org/questions/qa20_car_v-2-0_17-1ff/)

6) ASI Service and License Agreement, 29th August 2016, Section 5 Obligations of the Parties, Point 5.8 Page 9, Annex 2 Terms of Reference, Section 1.1.10 and 1.1.11 page 20, Annex 2 Section 4 Monitoring CAB and auditor performance, Page 21 and Annex 2 section 7 Information and data sharing, Page 22

7) Non conformity report (Finding No 58902 regarding a non-conformity against a CAB raised by Antonio Hervas of ASI for non-submission of an audit report within the 90 days deadline (confidential)

Section C - Aquaculture

Essential Component C.1.10

The standard requires the aquaculture facility to establish, implement and maintain appropriate procedures and/or systems to reduce the likelihood of disease and parasite transmission within and between the aquaculture facility and natural aquatic fauna.

SeaChoice comment: Arguably one of the most critical indicators of the Salmon Standard, in relation to on-farm sea lice counts and juvenile wild fish impacts, indicator 3.1.7 of the Standard requires farms to meet 0.1 mature female lice per farmed fish. ASC approved sea lice variances (numbers 88 and 141) override this requirement with the DFO Pacific Aquaculture Regulation's (PAR) 3 motile *L. salmonis* per fish: <http://variance-requests.asc-aqua.org/questions/vr-141-maximum-on-farm-lice-levels/>

C1.10 guidance states "verification that the management measures are suitable and employed is expected".

Peer reviewed studies demonstrate the management measures are not suitable. More specifically, studies have demonstrated the vulnerability of wild salmon populations due to lice loads elevated by farms with ineffective sea lice management. Lice impacts on wild salmon remain a serious concern in B.C. and there is little evidence to suggest that the PAR regime has been effective in encouraging timely and effective management.

For example, analyses based on 15 years of field work modelled a 23 per cent loss to the Broughton Archipelago pink salmon population due to 2015 high *L. salmonis* lice loads. The study highlighted warmer sea conditions, inadequacies in treatment coordination, absence of proactive treatments and a lack of an area-based management scheme as contributors to the high lice loads. The most recent report from the same scientists at the Salmon Coast Field Station (now based on 17 years of field monitoring data) concluded:

The prevalence and abundance of lice has been relatively high for three consecutive years, following a decade of relatively low numbers. Although changing environmental conditions likely play a role, management on salmon farms is clearly a factor affecting outbreaks on wild salmon.

Other studies suggested the indirect mortality impact on Fraser River sockeye by the sea louse *Caligus clemensi* to be significant. The studies concluded the PAR sea lice management regime is inadequate as it does not require industry to manage *Caligus* numbers on farmed salmon.

Furthermore, the sea lice variances have not been employed as expected. Auditors routinely cite the variance number and the PAR regime, but no upper limit on absolute lice abundance, or on lice per fish, is applied. The metric provided by the Standard has been replaced, in effect, with a management standard: so long as the lice are being treated in accordance with government management requirements, the farms are deemed certifiable. References: Bateman AW, Peacock, SJ, Connors, B, Polk, Z, Berg, D, Krkošek, M & Morton, A (2016). Recent failure to control sea louse outbreaks on salmon in the Broughton Archipelago, British Columbia, Canadian Journal of Fisheries and Aquatic Sciences, 2016, 73(8): 1164-1172, <https://doi.org/10.1139/cjfas-2016-0122>

Peacock, S.J., Portner, L., Harrington, P.D., Kelly, G., Forbes, H., & Guincharde, C. 2017. Sea lice on juvenile wild salmon in the Broughton Archipelago, British Columbia. A report from the Salmon Coast Field Station Society.

Godwin, SC, Dill, LM, Reynolds, JD & Krkošek, M (2015). Sea lice, sockeye salmon, and foraging competition: lousy fish are lousy competitors, Canadian Journal of Fisheries and Aquatic Sciences, 2015, 72(7): 1113-1120, <https://doi.org/10.1139/cjfas-2014-0284>

Godwin, SC, Dill, LM, Krkošek, M, Price, MHH & Reynolds, JD (2017). Reduced growth in wild juvenile sockeye salmon *Oncorhynchus nerka* infected with sea lice *Journal of Fish Biology*, doi:10.1111/jfb.13325

GSSI response: The ASC Salmon Standard is in alignment with Essential Component C.1.10. Based on the comment of SeaChoice, no additional evidence has been included in the final conclusion.

The application of the ASC variance request on sea lice count is not relevant for the alignment of the ASC Salmon standard with GSSI Essential Component C.1.10. As such the ASC Salmon Standard is considered in alignment with Essential Component C.1.10 based on the evidence provided in the conclusion.

The application of the variance requests is reviewed as part of Performance Areas A and B (B.1.03, B.2.05, B.2.06, B.2.10, B.2.16) and has been deemed in alignment with the relevant GSSI Essential Components.

The GSSI Manual (p. 13) states that “The guidance given in the application form helps to explain the intention of the GSSI Component and provides examples of evidence.” This means the GSSI Guidance provides recommendations and suggestions but does not mandate or require specific approaches or activities.

Conclusion on GSSI Essential Component C.1.10

Conclusion: The ASC Salmon Standard is in alignment because the standard includes indicators that require:

- 1) all dead fish are removed and disposed of in a responsible manner,
- 2) all salmon on the site are a single year class,
- 3) if the farm suspects an unidentifiable transmissible agent, or if the farm experiences unexplained increased mortality, the farm has to:
 - report the issue to the ABM and to the appropriate regulatory authority
 - increase monitoring and surveillance on the farm and within the ABM
 - promptly made findings publicly available,
- 4) farms operate in compliance with the OIE Aquatic Animal Health Code,
- 5) if an OIE-notifiable disease is confirmed on the farm, evidence that:
 - the farm has, at minimum, immediately culled the pen(s) in which the disease was detected
 - the farm immediately notified the other farms in the ABM
 - the farm and the ABM enhanced monitoring and conducted rigorous testing for the disease
 - the farm promptly made findings publicly available,
- 6) participation in an Area-Based Management (ABM) scheme for managing disease and resistance to treatments that includes coordination of stocking, fallowing, therapeutic treatments and information sharing. Detailed requirements are in Appendix II-1,

7) establishment and annual review of a maximum sea lice load for the entire ABM and for the individual farm as outlined in Appendix II-2,

8) frequent on-farm testing for sea lice, with test results made easily publicly available within seven days of testing,

9) in areas with wild salmonids, evidence of data and the farm's understanding of that data, around salmonid migration routes, migration timing and stock productivity in major waterways within 50 kilometers of the farm,

10) in areas of wild salmonids, monitoring of sea lice levels on wild out-migrating salmon juveniles or on coastal sea trout or Arctic char, with results made publicly available. See requirements in Appendix III-1, and

11) in areas of wild salmonids, maximum on-farm lice levels during sensitive periods for wild fish. See detailed requirements in Appendix II, subsection 2.

References:

1) ASC Salmon Standard v1.1 - April 2017

2) ASC Salmon Audit Manual v1.1 - April 2017

Indicators 3.1.1, 3.1.3 - 3.1.7, 5.1.3, 5.4.1, 5.4.2, 5.4.3, and 5.4.4.

3) https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Salmon-Standard_v1.1.pdf

Supplementary Component C.1.10.01

Where the production system allows the discharge of parasites that are a known concern to local wildlife, the standard requires monitoring and adapting farming practices based on trigger limits of relevant parasite numbers on wild fish where this is feasible.

SeaChoice comment: See C1.10 above

GSSI response: See response to C.1.10 above.

Conclusion on GSSI Supplementary Component C.1.10.01

Conclusion: The ASC Salmon Standard is in alignment because the standard includes indicators that require:

- 1) a demonstrated commitment to collaborate with NGOs, academics and governments on areas of mutually agreed research to measure possible impacts on wild stocks,
- 2) establishment and annual review of a maximum sea lice load for the entire ABM and for the individual farm as outlined in Appendix II-2,
- 3) in areas with wild salmonids, evidence of data and the farm's understanding of that data, around salmonid migration routes, migration timing and stock productivity in major waterways within 50 kilometers of the farm,
- 4) in areas of wild salmonids, monitoring of sea lice levels on wild out-migrating salmon juveniles or on coastal sea trout or Arctic char, with results made publicly available. See requirements in Appendix III- 1,
- 5) in areas of wild salmonids, maximum on-farm lice levels during sensitive periods for wild fish. See detailed requirements in Appendix II, subsection 2. Requirement: 0.1 mature female sealice, and
- 6) maximum farm level cumulative parasiticide treatment index (PTI) score as calculated according to the formula in Appendix VII. Requirement: PTI score \leq 13.

References:

- 1) ASC Salmon Standard v1.1 - April 2017
- 2) ASC Salmon Audit Manual v1.1 - April 2017
Indicators 3.1.2, 3.1.3, 3.1.5, 3.1.6, 3.1.7, and 5.2.5.
- 3) https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Salmon-Standard_v1.1.pdf

Supplementary Component C.7.01.01

The standard excludes (or decertifies) aquaculture facilities from certification that have repeated escape events over a representative number of production cycles.

SeaChoice comment: There is public evidence that escapes at ASC certified farms have occurred. For example, evidence suggests the Chilean farm, Aracena 3, has experienced two escape events. Approximately 100,000 fish escaped in July 2016 and 6,493 in July 2017. Unfortunately, despite the requirement to do so, no audit reports have been posted for Aracena 3 in two years on the ASC website. Consequently, it is unknown if or how this farm has been held to compliance to indicator 3.4.1 - but the farm remains certified: <http://asc.force.com/Certificates/ASCCertDetails2?id=a012400000KG2umAAD>

Public reporting for the Norwegian farm, Valoyan, lists 1415 escaped fish in July 2016. Contrary to this, the farm's second surveillance report, dated October 2016, states no escapes have occurred.

The most alarming escape event occurred at the Gulin farm (Faroe Islands) which recorded 109,515 fish escapes due to "weather conditions". The report date seems to be inaccurate, however, the likely correct date is December 2017 - three months after the first surveillance audit.

These examples show decertification has yet to occur for farms that have publicly reported large escapes over the ASC threshold or "maximum cap" of 300 escaped fish. References: http://www.fis.com/fis/worldnews//search_brief.asp?l=e&id=85831&ndb=1&monthyear=7-2016&day=24&country=41&df=1

<http://marineharvest.com/globalassets/planet/asc-dashboard/norway/region-mid/valoyan/2016/valoyan-2016-july-08.pdf>

http://www.bakkafrost.com/media/1756/a06_y2018_w9.pdf

GSSI response: : The ASC Salmon Standard is in alignment with Supplementary Component C.7.01.01. Based on the comment of SeaChoice, no additional evidence has been included in the final conclusion.

The issue raised here by SeaChoice is not a technical (aquaculture) issue related to alignment between the GSSI Benchmarking Tool and the ASC Salmon standard. The issue refers to an alleged failure of the auditing, accountability and governance systems of the standard (Parts A&B).

Additionally the text of the component says "repeated escape events over a representative number of production cycles," so this component does not require actions after a single event, independent of the size of the incident.

In response to SeaChoice's comment, the conclusion of the Essential Component C.7.01.01 has not been changed.

Conclusion on GSSI Supplementary Component C.7.01.01

Conclusion: The ASC Salmon Standard is in alignment because the standard includes indicators that require:

- 1) a maximum number of escapees in the most recent production cycle of 300,
- 2) accuracy of the counting technology or counting method used for calculating stocking and harvest numbers of $\geq 98\%$, and
- 3) the CAB should raise a major non-conformity where minor nonconformities are repeatedly raised against a particular requirement.

References:

- 1) ASC Salmon Standard v1.1 - April 2017, Indicators 3.4.1 and 3.4.2.
- 2) ASC Salmon Audit Manual v1.1 - April 2017, Indicators 3.4.1 and 3.4.2.
- 3) ASC Certification and Accreditation Requirements v2.1 - August 2017, CAR 17.10.1.1 b
- 4) https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Salmon-Standard_v1.1.pdf
- 5) https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Certification-and-Accreditation-Requirements-v.2.1_including-multi-site_clean-1.pdf

Supplementary Component C.7.01.02

Within detection limitations, the standard requires a stringent maximum cap on the total number of escaped fish that would lead to the loss of certification.

SeaChoice comment: See C7.01.01 Above

GSSI response: The ASC Salmon Standard is in alignment with Supplementary Component C.7.01.02. Based on the comment of SeaChoice, no additional evidence has been included in the final conclusion.

The issue raised here by SeaChoice is not a technical (aquaculture) issue related to alignment between the GSSI Benchmarking Tool and the ASC Salmon standard. The issue refers to a failure of the auditing, accountability and governance systems of the standard (Parts A&B). The maximum number of escapees is defined (300) and the consequences of exceeding this number are provided in the Certification and Accreditation Requirements of the ASC Salmon Standard.

In response to SeaChoice's comment, the conclusion of the Essential Component C.7.01.01 has not been changed.

Conclusion on GSSI Supplementary Component C.7.01.02

Conclusion: The ASC Salmon Standard is in alignment because the standard includes indicators that require:

- 1) a maximum number of escapees in the most recent production cycle of 300,
- 2) accuracy of the counting technology or counting method used for calculating stocking and harvest numbers of $\geq 98\%$, and
- 3) non-conformities leading to loss of certification are addressed in the ASC Certification and Accreditation Requirements.

References:

- 1) ASC Salmon Standard v1.1 - April 2017, Indicators 3.4.1 and 3.4.2.
- 2) ASC Salmon Audit Manual v1.1 - April 2017, Indicators 3.4.1 and 3.4.2.
- 3) ASC Certification and Accreditation Requirements v2.1 - August 2017, CAR 17.10.1.1 b
- 4) https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Salmon-Standard_v1.1.pdf
- 5) https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Certification-and-Accreditation-Requirements-v.2.1_including-multi-site_clean-1.pdf

Many thanks again for participating in the Public Consultation and we do hope that the above responses have been helpful. We look forward to a continued collaboration and dialogue going forward.



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