Haarlem, 6th of April 2018

Subject: Response to the Anderson Cabot Center for Ocean Life at the New England Aquarium

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Dear Matt,

Many thanks for taking the time to provide your comments on the GSSI Benchmark Report for the GLOBALG.A.P. Aquaculture Certification System.

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 GLOBALG.A.P. Aquaculture Certification System is set out below.

Section C - Aquaculture

Essential Component C.4.04

The standard requires that the aquaculture facility sources feed from a manufacturer that has a written policy which includes assessment of source fishery status and identification of improvement needs and work plan to deliver improvements. The policy must include a commitment and timeline to source aquaculture and fishery products from responsible/best practice sources, such as those certified a standard benchmarked at minimum consistent with relevant FAO's ecolabelling guidelines or by identified independent risk assessment.

Anderson Cabot Center comment: GLOBALG.A.P. is not in compliance with this Essential Component because standard 15.1 (responsible sourcing plan) of the compound feed standard is a MINOR MUST - while a high percentage of minor musts are required to be certified it's unacceptable that a GSSI Essential Component can be met by an optional standard. This is also true of the Responsible Operations Standard - which is an optional add on to GLOBALG.A.P. certification. Additionally, there the requirements of the responsible sourcing plan do not conform with GSSI's Essential Component, such as to meet certification targets by a certain timeframe.

GSSI response: The Independent Expert and the Benchmark Committee are aware that the main reference points in the GlobalG.A.P. Compound Feed Standard relevant to alignment with Essential Component C.4.04, 15.1-15.5, are Minor Musts. The IE and the BC have taken this into careful consideration and have concluded that, in this specific context, the reference to a Minor Must is acceptable for the following reasons:

1. GlobalG.A.P. requires feed mills to be certified against their CFM standard, ensuring a third-party check at the feed manufacturer level of conformance with all Major and Minor Musts.
2. The GlobalG.A.P. CFM standard in 15.1 requires a feed mill to have a responsible sourcing policy in place. In addition, 15.2-15.5 provide specific control points on key elements of such policy, including prevention of sourcing from I.U.U. fisheries, IUCN red-listed species and implementation of the Code of Conduct for Responsible Fisheries.

3. A minimum 95% of Minor Must Control Points must be met to achieve certification (GlobalG.A.P. General Procedures, p. 16). The Compound Feed Standard includes 35 Minor Must Control Points, meaning that 34 out of 35 Minor Must Control Points must be met by any facility to achieve certification.

The combination of these three factors provides the IE and Benchmark Committee with sufficient assurance that the GlobalG.A.P. Aquaculture Certification System is in alignment with Essential Component C.4.04. It ensures that 4 out of the 5 control points of 15.1-15.5 need to be met at all times. Therefore, even in the case where control point 15.1 is not met, a feed manufacturer is still independently checked for compliance with 15.2-15.5, which collectively are considered to meet the GSSIEssential Component C.4.04.

The IE and BC argue that the fact that the GlobalG.A.P. Aquaculture Certification System requires an independent certification against 15.2-15.5 provides a higher level of assurance than the self-declaration of a sourcing policy as required in in C.4.04. The requirement of an independent certification of the feed manufacturer was therefore instrumental for the IE and BC to judge the submitted evidence sufficient for alignment.

Regarding the Anderson Cabot Center statement that "the requirements of the responsible sourcing plan do not conform with GSSI's Essential Component, such as to meet certification targets by a certain timeframe," CFM 15.1 explicitly states "There shall be a written sustainability sourcing policy in place covering the purchases of raw materials or there shall be a plan in place to create such a policy with specific timelines." Although specification of a particular timeline is not part of CFM15.1, this specification is not required by this GSSI Essential Component, only that a timeline for responsible sourcing is present and required of the feed manufacturer applicant.

In response to Anderson Cabot Center's comment, the conclusion of the Essential Component C.4.04 has not changed. However, additional evidence regarding ingredient sourcing is provided.

Conclusion on GSSI Essential Component C.4.04

Conclusion: The GLOBALG.A.P. Aquaculture Certification System is in alignment because the GLOBALG.A.P. Aquaculture standard version 5.1-1 includes Control Points regarding feed ingredient sourcing policy:

AQ 7.1.2: All compound feed used at the farm has been manufactured by and obtained from a recognized source.

CFM 15.1: There shall be a written sustainability sourcing policy in place covering the purchases of raw materials or there shall be a plan in place to create such a policy with specific timelines. The policy shall at least include references to human rights, labor practices and environmental issues.

CFM 15.2: When sourcing fishmeal and fish oil, the fishery and the production of fishmeal and oil shall be in compliance with the laws and regulations of the country of production and the country of destination related to fisheries. The fishmeal and/or fish oil producer shall present on request documentation that the catch processed does not originate from any fisheries that are illegal, unregulated or unreported.

CFM 15.3: The producer of compound feed shall verify that the species of wild captured fish used to produce fishmeal and fish oil are not on the IUCN Red List classified as critically endangered or endangered. (IUCN - The International Union for the Conservation of Nature and Natural Resources). Reference: http://www.iucnredlist.org/. This will require that the supplier provides the information on the species used at the time of purchase. This information shall also include where the fishmeal and fish oil are produced (country of production). If species are not evaluated, they will not be recorded in the Red List, and this is acceptable as

long as no other sources of information conclude that these are endangered species.

CFM 15.4: The producer of compound feed shall be able to verify the species and the country of origin of farmed fish used to produce fishmeal and fish oil.

CFM 15.5: Documentation shall be presented on the percentage of supply of fishmeal/ fish oil which originates from fisheries managed in accordance with and adhering to the FAO Code of Conduct for Responsible Fisheries.

RO 4.3.4: Records of the certification status of all fishmeal and fish oil received shall be collected from suppliers and recorded on an internal database. This information shall be used to calculate the percentage of fishmeal/fish oil purchased within a calendar year that originates from fisheries managed in accordance with and adhering to the FAO Code of Conduct for Responsible Fisheries (fisheries in compliance with IFFO RS or MSC are recognized as compliant fisheries). Fishmeal and fish oil that originate from a recognized FIP(s) shall meet the requirements outlined in Guideline 1 of this document.

References:

1) 171110_GG_IFA_CPCC_AQ_V5_1-1_en.pdf, Aquaculture Module Control Point AQ 7.1.2.

2) Aquaculture Standard Documents/All Farm Base, Aquaculture Module/Control Points and Compliance Criteria http://www.globalgap.org/uk_en/for-producers/globalg.a.p./integrated-farm-assurance-ifa/aquaculture/

3) 160805_gg_cfm_cpcc_v2.2_Aug16_en.pdf, Compound Feed Manufacturing Control Points CFM 15.1; 15.5.

4) Compound Feed Manufacturing Standard Documents: https://www.globalgap.org/uk_en/for-producers/globalg.a.p./cfm/

5) 150801_GG_ROS_FEED_MANUFACTURERS_V1_en.pdf, The Responsible Operations Standard (ROS) Add-On for Compound Feed Manufacturers Control Points RO 4.3.1; 4.3.2; 4.3.3; 4.3.4.

6) Download ROS Documents: https://www.globalgap.org/uk_en/for-producers/globalg.a.p.-add-on/responsible-operations-standard/index.html

Essential Component C.5.01

For cage production systems, the standard requires appropriate management measures for preventing excessive impacts of aquaculture facility waste on benthic environments.

Anderson Cabot Center comment: An Environmental and Biodiversity Management Plan (plan being the operative term here) is insufficient to meet this Essential Component. As is clearly articulated in GSSI's guidance; consist schemes should use elements such as AZE's, set environmental quality standards, and verify that these standards are met and apply mediation if necessary. Throughout GSSI's Aquaculture tool, the term "measures" rather than "systems" was used to show that that actual defined standards rather than plans are required for consistency with a component. GLOBALG.A.P.'s approach of planning and sampling doesn't go far enough, especially since GSSI does not currently review audit records to show that this level of expectation is being met.

GSSI response: Unlike other aquaculture certification schemes, GlobalG.A.P. took the approach of developing a comprehensive standard that would apply to the full range of fed aquaculture species, irrespective of culture

system type and production environment. At the "All Farm" level of the GlobalG.A.P. standards are Section AF 1 that addresses "Site History and Site Management," Section AF 6 that addresses "Waste and Pollution Management, Recycling and Reuse," and Section AF 7 that addresses "Conservation."

AF 1.2.1 requires that a written risk assessment, updated regularly, is in place to determine whether the sites are appropriate for production. The risk assessment may be based on a generic assessment but is customized to the farm situation. Risk assessments must take into account potential physical, chemical, and biological hazards.

The environmental impacts of the proposed enterprises must be described. AF 6.1.1 requires that all possible waste products and sources of pollution are identified in all areas of the farm. AF 6.2.1 requires a comprehensive, current, and documented Waste and Pollution Action Plan that must address water contamination, among other things.

In the Aquaculture Module, Section AQ 9 addresses "Environmental and Biodiversity Management." Central to this section is the requirement that applicants develop an Environmental Impact Assessment (EIA). Based on the findings of the EIA, an Environmental Management Plan (EMP) must be developed to lay out management measures to address main impacts of the farming activity on the environment and on biodiversity. A competently-developed EIA and EMP for cage farming in marine waters would surely address the need for management measures (e.g., fallowing, site rotation) to address benthic impacts. Facility audits would determine if the plan was operational.

AQ 9.1.1 requires that a waste management system be in place, according to the Environmental Risk assessment (ERA). The Environmental Management Plan required under AQ 9.1.4 is the step that follows 'planning and sampling' in which farming strategies are expected to be implemented to reach compliance.

AQ 9.1.5 requires a sampling program to monitor the impact of the farming activity on the benthic fauna and recipient water body sediment. Monitoring of benthic biodiversity, chemical indicators and possible accumulation of chemical residues in the recipient water body sediment mustl take place. The types of analysis and monitoring frequency is determined based on the risks identified in the EIA (refer to AQ 9.1.3).

AQ 9.1.4 requires that an EMP based on the EIA (AQ 9.1.3) and a Risk Assessment (AF 1.2.1) are developed to minimize all effects on the environment. An effective EMP must be in place that incoporates a regular environmental monitoring program. The records of disposal and emission must demonstrate legal compliance and compliance with the EMP.

In response to Anderson Cabot Center's comment, the conclusion of the Essential Component C.5.01 has not been changed. However, new evidence from the All Farm Module (AF 1.2.1, 1.2.2, 6.2.1 and 7.1.1) is now included to strengthen the case for alignment with this GSSI Component.

Conclusion on GSSI Essential Component C.5.01

Conclusion: The GLOBALG.A.P. Aquaculture Certification System is in alignment because the GLOBALG.A.P. Aquaculture standard version 5.1-1 includes Control Points that address benthic impacts:

AF 1.2.1: A written risk assessment to determine whether the sites are appropriate for production shall be available for all sites. It shall be ready for the initial inspection and maintained updated and reviewed when new sites enter in production and when risks for existing ones have changed, or at least annually, whichever is shorter. The risk assessment may be based on a generic one but shall be customized to the farm situation.

Risk assessments shall take into account:

- Potential physical, chemical (including allergens) and biological hazards

- Site history (for sites that are new to agricultural production, history of five years is advised and a minimum of one year shall be known)

- Impact of proposed enterprises on adjacent stock/crops/ environment, and the health and safety of animals in the scope of the livestock and aquaculture certification.

AF 1.2.2: A management plan addresses the risks identified in AF 1.2.1 and describes the hazard control procedures that justify that the site in question is suitable for production. This plan shall be appropriate to the farm operations, and there shall be evidence of its implementation and effectiveness.

AF 6.2.1: A comprehensive, current, and documented plan that covers wastage reduction, pollution and waste recycling is available. Air, soil, and water contamination shall be considered where relevant along with all products and sources identified in the plan. For aquaculture, cross-reference with Aquaculture Module AQ 9.1.1.

AF 7.1.1: There shall be a written action plan that aims to enhance habitats and maintain biodiversity on the farm. This can be either an individual plan or a regional activity that the farm is participating in or is covered by. It shall pay special attention to areas of environmental interest being protected and make reference to legal requirements where applicable. The action plan shall include knowledge of integrated pest management practices, nutrient use of crops, conservation sites, water supplies, the impact on other users, etc.

AQ 9.1.4: An effective Environmental and biodiversity Management Plan- EMP shall be in place. This shall incorporate a regular environmental monitoring program. The records of disposal and emission shall demonstrate both legal compliance and compliance with the EMP.

AQ 9.1.5: For all farming systems, monitoring of benthic biodiversity, chemical indicators and possible accumulation of chemical residues in the recipient water body sediment shall take place. Type of analysis and monitoring frequency is determined based on the risks identified in the EIA (refer to AQ 9.1.3).

References:

1) 171110_GG_IFA_CPCC_AQ_V5_1-1_en.pdf, Aquaculture Module Control Points AQ 9.1.4; 9.1.5.

2) Aquaculture Standard Documents/All Farm Base, Aquaculture Module/Control Points and Compliance Criteria http://www.globalgap.org/uk_en/for-producers/globalg.a.p./integrated-farm-assurance-ifa/aquaculture/

Essential Component C.6.05

The standard requires that suitable measures are in place to ensure that hatchery-raised seed are free from relevant/important pathogens before stocking for grow-out.

Anderson Cabot Center comment: GLOBALG.A.P. does not specifically require that hatchery seed are free of disease as required by the Essential Criteria - they only do so if it is a legal requirement (AQ 5.2.3). A key example is the difference in language used for broodstock in AQ. 5.2.4 to seedstock in AQ 5.2.5. As such, this is not in full compliance with the Essential Component.

GSSI response: In the evidence for alignment provided in the report released for public comment, we used the text of the GlobalG.A.P. Control Point. (In other cases in the report, we used the text of the GloalG.A.P. Compliance Criteria.) The text of the Compliance Criteria for AQ 5.2.3 is more clear and non- conditional: "Fish or seedlings introduced to the farm shall be certified free from known diseases. Records shall be on site."

The GLOBALG.A.P. Aquaculture certification scheme has a mandatory requirement for the the use of certified seedlings. Disease testing is part of the certification process. Seedling suppliers are subject of an audit against all GLOBALG.A.P. Aquaculture requirements, which includes determination of disease-free status. AQ 5.2.5 requires seedling suppliers to provide analytical test certificates of routine surveillance disease monitoring, at least for known diseases for the specific species as defined within the veterinary health plan. Records must include information on sampling protocols, test methods and reagents, frequency and results.

The GLOBALG.A.P. Aquaculture standard follows the OIE Animal Aquatic Health Code. The competent authority must recognize the laboratory used for notifiable disease monitoring. AQ 5.2.8 requires the hatchery to have a system to register all disease occurrences. In addition to this level of assurance, AQ 5.2.3 requires that, where there is a legal requirement for health status certification, fish or seedlings introduced to the farm must be certified free from known diseases. It is understood that different countries might have specific import rules, therefore the legal condition is added on top of the GLOBALG.A.P. certification

In response to Anderson Cabot Center's comment, the conclusion of the Essential Component C.6.05 has not been changed. However, the evidence statement for AQ 5.2.3 has been changed from the text of the Control Point to the text of the Compliance Criteria and the evidence statement for AQ 5.2.5 now includes the text of the Compliance Criteria.

Conclusion on GSSI Essential Component C.6.05

Conclusion: The GLOBALG.A.P. Aquaculture Certification System is in alignment because the GLOBALG.A.P. Aquaculture standard version 5.1-1 includes Control Points that require disease screening of hatchery-produced seed:

AQ 5.2.3: Fish or seedlings introduced to the farm shall be certified free from known diseases. Records shall be on site.

AQ 5.2.5: Seedling suppliers shall provide analytical test certificates of routine surveillance disease monitoring, at least for known diseases for the specific species as defined within the veterinary health plan. Records shall include information on sampling protocols, test methods and reagents, frequency and results. The competent authority shall recognize the laboratory used for notifiable disease monitoring.

AQ 1.1.1: Farms shall operate in accordance with applicable legislation in relation to the GLOBALG.A.P. Standard.

References:

1) 171110_GG_IFA_CPCC_AQ_V5_1-1_en.pdf, Aquaculture Module Control Points AQ 5.2.3; 5.2.5; 1.1.1.

2) Aquaculture Standard Documents/All Farm Base, Aquaculture Module/Control Points and Compliance Criteria http://www.globalgap.org/uk_en/for-producers/globalg.a.p./integrated-farm-assurance-ifa/aquaculture/

Essential Component C.8.04

The standard requires, where appropriate, management measures for effluents to reduce adverse impacts on water quality of water bodies receiving effluents.

Anderson Cabot Center comment: GLOBALG.A.P. does not meet this essential component because: 1) they don't require pH measures, 2) AQ 10.2.1 (refering to the Compliance Criteria) only specifies legal compliance criteria are auditor verified and not EMP or self-defined defined quality standards, 3) It doesn't require independent verification of water quality standards, which are "expected" in the guidance.

GSSI response: On point 1) the GLOBALG.A.P. Aquaculture certification system requires that the farm must have a risk-based monitoring and control system for water quality. The risk assessment (refer to AQ 10.1.5) includes relevant water quality parameters, fluctuations and sampling points (at the farm or production unit level). Records for each site must be in place. In AQ 5.2.16 it is specified that all facilities have a routine water quality monitoring and control program that is based on a risk assessment in AQ10.1.5, taking into account all potential sources of pollution or contamination. AQ 5.2.16 specifically references pH and is thus included in the updated evidence for alignment.

On point 2) in the Anderson Cabot Center comment, the text of the Compliance Criteria for AQ 10.2.1 reads:

"It is the responsibility of producers or producer organizations to ensure any process that impacts the recipient water does not exceed targets in the EMP. Farm management shall be able to demonstrate compliance and knowledge of legislation at interview. The records and discharge consents, which are valid and operating within limits at each site, shall be in place." The key phrase is "…any process that impacts the recipient water does not exceed targets in the EMP. "This indicates that water quality targets are defined in the EMP and water quality records must be in place to demonstrate that farms are operating within those water quality limits. Thus, the statement by Anderson Cabot Center that AQ 10.2.1 "only specifies legal compliance criteria are auditor verified and not EMP or self-defined defined quality standards" is confusing. Auditors will verify collection of water quality records and operation of the farm within legal limits and limits established in the EMP. The standard requires that measured impacts are in accordance with legislation and following the results of the EIA/EMP.

AQ 9.1.3 requires a biodiversity-inclusive Environmental Impact Assessment (EIA) and Environmental Risk Assessment (ERA). These are updated following relevant changes in the farm operations with respect to veterinary or environmental threats.

AQ 9.1.4 requires that an Environmental and biodiversity Management Plan - EMP (based on the Environmental and biodiversity Impact Assessment at AQ 9.1.3 and the Risk Assessment mentioned in AF 1.2.1) must be developed, setting out strategies to minimize all effects on the environment. An effective EMP that incorporates a regular environmental monitoring program must be in place. Records of disposal and emission must demonstrate legal compliance and compliance with the EMP.

AQ 6.1 requires a sampling program based on likely contaminants, residues and substances for the type and location of the aquaculture operation and feed ingredients. AQ 6.2 requires that the laboratory used for testing is accredited to the ISO 17025 standard or successfully participating in a proficiency ring-testing program.

On point 3) in the Anderson Cabot Center comment, we reiterate that text in GSSI Guidance statements are recommendations and suggestions, and not requirements. Thus, independent verification of water quality standards are not required but are recommended.

In response to Anderson Cabot Center's comment, the conclusion of the Essential Component C.8.04 has not been changed.

Conclusion on GSSI Essential Component C.8.04

Conclusion: The GLOBALG.A.P. Aquaculture Certification System is in alignment because the GLOBALG.A.P. Aquaculture standard version 5.1-1 includes Control Points that address receiving body water quality:

AF 6.1.1: All possible waste products and sources of pollution have been identified in all areas of the farm.

AQ 9.1.3: A biodiversity-inclusive Environmental Impact Assessment (EIA) and Environmental Risk Assessment (ERA) must be done, which must be updated following relevant changes in the farm operations with respect to veterinary or environmental threats. Legal compliance of all issues must be demonstrated. Please refer to AQ Annex I - Examples EIA-ERA and respective EMPs and AQ Annex 2 - Biodiversity in Environmental Impact Assessment. The preparation of the ERA shall be accomplished by competent persons whereby a documented motivation of their competence should be available. Minimum requirements for EIA are for instance, but not restricted to, following processes that are inherent to regular farming:

- Effluent BOD/COD load
- Effluent Kjeldahl Nitrogen nitrate and nitrite load
- Effluent phosphorus load
- Effluent suspended solids load
- Disposal of solid wastes and litter
- Use and legal disposal of all chemical compounds (see definition)
- Emission of light, sound and vibrations
- Emission of exhaust gases (e.g. generator sets)
- Abstraction and discharge of ground water with respect to volume and analysis
- Use of energy derived from fossil energy (eg. diesel) of indirect (e.g. electricity from municipal net)
- Visual disturbance from farming activities

Minimum requirements for Environmental Risk Assessment (ERA) are for instance, but not restricted to, following processes that do not occur during regular farming, but may incidentally happen in the course of an accident:

- Accidental spill during storage and handling of chemical compounds and fuels
- Emissions resulting from fire and fire extinguishing
- Release of farmed animals, including seedlings (eggs, larvae, others) and their parasites
- Salinization of ground water and fresh water bodies
- Temporary exceeding of water discharge limits

AQ 10.1.4: Inlet / outlet water quality shall be in compliance with existing applicable local regulations and requirements of the EIA/EMP.

AQ 10.1.5: A documented risk assessment shall be in place covering all potential water pollution sources affecting food safety and animal health & welfare. Where risks have been identified, measures are taken such as water treatment, filtration, disinfection, etc.

AQ 10.2.1: It is the responsibility of producers or producer organizations to ensure any process that impacts the recipient water does not exceed targets in the EMP.

AQ 5.2.16: The farm shall have in place a risk based monitoring and control system for water quality to ensure the health and welfare of the fish is not compromised. The risk assessment (refer to AQ 10.1.5) shall include relevant water quality parameters, fluctuations and sampling points (at farm or production unit level), such as temperature, dissolved oxygen, carbon dioxide, dissolved nitrogen (over-saturation), pH, ammonia, nitrate, nitrite and suspended solids. Records for each site shall be in place. Frequency is established by the risk assessment.

AQ 1.1.3: All aquaculture farms shall be registered as such with the relevant competent authority as required by national legislation. Registration and license documents are available. Examples include: seabed leases and consents for discharge of effluent and license/consession from the authority to grow a set biomass of aquaculture products or allocation of feed quota.

AQ 9.1.5: For all farming systems, monitoring of benthic biodiversity, chemical indicators and possible accumulation of chemical residues in the recipient water body sediment shall take place. Type of analysis and monitoring frequency is determined based on the risks identified in the EIA (refer to AQ 9.1.3) Analysis results are available for inspection.

AQ 12.1.4 Fish holding facilites, including live fish wellboats, shall NOT be contaminated. The records of bloodwater and effluent disposal shall be in place and collection facilities assessed. The environmental risk assessment (refer to AQ 9.1.3) shall also include fuel spillage riks at fish holding facilites.

References:

1) 171110_GG_IFA_CPCC_AQ_V5_1-1_en.pdf, All Farm Module Control Point 6.1.1. Aquaculture Module Control Points AQ 9.1.3; 10.1.4; 10.1.5; 10.2.1; 1.1.3; 9.1.5; 12.1.4.

2) Aquaculture Standard Documents/All Farm Base, Aquaculture Module/Control Points and Compliance Criteria http://www.globalgap.org/uk_en/for-producers/globalg.a.p./integrated-farm-assurance-ifa/aquaculture/

The language of the GSSI Essential Component and Guidance statements encourages but does not mandate certain aspects or parameter, since it is a Guidance for the Independent Experts about which evidence to expect or to demand.

This, however, does not mean that exactly these pieces of evidence or these specific paramters have to be presented or met but rather that this could be a way to bring the standard into alignment with the components intension. As mentioned in the GSSI Manual (p.13, para 6), “The guidance given in the application form helps to explain the intention of the GSSI Component and provides examples of evidence.

As well, on p. 17 of the Manual, “This information has been provided by GSSI to assist applicant schemes to better understand the GSSI Component and its intention. This column [the guidance] is designed to support identifying and supplying objective evidence within the Supporting Documentation Column and to collate the key supporting documentation dossier. It is important to understand that the provided information is not exhaustive and represents examples. If there are other supporting documents, such as minutes of meetings, that clearly define and are supportive as objective evidence, this should not be overlooked and should be included within the dossier.”

What needs to be met and delivered is what is explicitly mentioned in the Component’s text. These are grounded in the Code of Conduct for Responsible Fisheries (CCRF) and the FAO Technical Guidelines for Aquaculture Certification for Essential Components, and in the CCRF and related FAO documents, ISO normative standards and ISEAL codes for Supplementary Components.

Audit reports are checked as samples, as described on p. 22 of the Manual. This might becomes an issue in case there are clear systematic deviations at the implementation level discovered by the IE as mentioned in the Manual on p. 25, para.5.2, point 5.

However, this needs to be assessed also in a balanced way since continuous quality of audits is a task for the Accreditation Bodies (ABs) and not the objective of the GSSI Benchmark Process.

How these ABs are checked by the schemes is a part of the GSSI components in the Process Sections.

The nature of the process for Section C is a technical review of the standard content in comparison to the GSSI Essential and Supplementary Components.

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.

Florian Zuber

GSSI Benchmark Manager