

Haarlem, 17th of February 2020

Matthew Thompson

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Subject: Response to Public Consultation ASC Scope Extension

Dear Matthew Thompson,

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

GSSI is committed to a transparent benchmark process with opportunity for engagement and comments. Following the consultation, the comments received from Anderson Cabot Center for Ocean Life and the other stakeholders have been carefully reviewed by the Independent Experts, Benchmark Committee and the GSSI Steering Board. Comprehensive responses to each of the comments are provided in this and other letters. After careful deliberations, the Benchmark Committee concluded the comments had been sufficiently addressed and recommends GSSI recognition of the ASC program, including the Shrimp Standard (formerly solely the Salmon Standard).

GSSI's responses to your comments by component number raised are set out below. The response to each of the comments is structured as follows:

1. Description of the Component: Essential or Supplementary and the corresponding numeration.
2. Text of the Component.
3. Submitted Comment.
4. Response by GSSI Independent Expert.
5. Conclusion [old part in black] [new part in blue]
6. References [old part in black] [new part in blue]

The answers to the comments and conclusions of the components make use of the GSSI benchmark language, including the following acronyms:

IE: Independent Expert
EC: Essential Component
SC: Supplementary Component
BC: Benchmark Committee
MOCA: Monitoring of Continued Alignment

■ Section C – Aquaculture

ESSENTIAL COMPONENT C.3.01

The standard requires that the aquaculture facility and its daily operations ensure that good culture and hygienic conditions are maintained.

■ Anderson Cabot Center comment

While ASC's criteria 7.7.1 appropriately addresses chemical storage and 7.7.2 appropriately address waste disposal, two key expected indicators of consistency with this Essential Component (EC) are missing, specifically appropriate storage of feed and appropriate pest control, are not addressed by the shrimp standard. Indeed, preventing feed contamination is usually considered a food safety issue (addressed in GSSI through the issue of feed biosecurity and wastage) and ASC states that "it is important to note that the ASC Shrimp Standard does not specifically address food safety issues, which are supposed to be covered through either international or national legislation (refer to P1) and, if necessary, through other certifications that focus on this aspect (such as the International Food Standard (IFS), the British Retail Consortium (BRC), ISO 22000 or GlobalGAP)." ASC does not require any of the stated certifications to be in place for its certification. In our experience, inappropriate feed storage and pest control are common issues at aquaculture farms, including shrimp farms. ASC's standard is insufficient to warrant consistency with this EC.

■ GSSI response

The ASC Shrimp standard is in alignment with Essential Component C.3.01. Based on the comment of the Anderson Cabot Center, no additional changes were made to the final conclusion.

The first sentence of the Guidance statement for this GSSI Essential Component states that "This is a general Essential Component that covers a range of potential issues depending on the type of production system, species being cultured, and the local environment, and as such there is a need for flexibility in how consistency is achieved" (emphasis mine). Furthermore, items such as "appropriate storage of feed" in GSSI Guidance statements are understood to be recommendations or examples of best practice, desirable though they may be, but not requirements. The ASC Shrimp standard includes several indicators cited as evidence of alignment that explicitly address the general GSSI requirement for "good health and hygiene conditions." In the ASC Shrimp standard, the Rationale for Criterion 5.1 includes the following statement: "At the farm level, biosecurity measures include controlling the inputs (e.g., water, feed and PLs)..." A statement that includes "controlling the inputs" can be interpreted to mean that feed storage is a consideration. Although it is certainly desirable and preferable that the ASC Shrimp standard include specific indicators relative to feed storage and pest control, their absence does not detract from other strong evidence indicating alignment with this GSSI Essential Component.

Conclusion on GSSI Essential Component C.3.01

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

- 1) appropriate controls are in place that maintains good culture and hygienic conditions on the farm which extends to all chemicals, including veterinary drugs, thereby ensuring that adverse impacts on environmental quality are minimised. Information on chemical storage and usage. Records of stocks and usage are available for all products. (5.3.3)
- 2) Responsible handling and disposal of wastes based on risk assessment and possibilities of recycling. Wastes must be managed in compliance with local regulations when they exist. In all cases, wastes must be managed in a way that is safe for human health and the surrounding environment (especially natural waters), in the best possible way depending on local facilities. When appropriate facilities for waste disposal are absent in the area, shrimp farms are allowed to bury non-hazardous solid wastes on site, provided all precautions have been taken to prevent the contamination of surrounding surface and ground waters. Non-organic wastes must not be burned on site due to their potential emissions of toxic gases.

Accredited waste management companies must be used where available. However, the ASC Shrimp Standard appreciates that shrimp farms are generally located in areas where accredited waste management companies are not necessarily established or accessible. Farmers must demonstrate the use of the most responsible disposal solutions based on what is locally available. Where hazardous biological wastes exists, including shrimp offal and mortalities, they must be managed according to a plan based on potential risks and national and/or international guidelines, when they exist, and solutions must be identified for the disposal of hazardous non-biological wastes, including used lubricants and chemical containers.

Recyclable wastes need to be identified and separated at the point of generation. Some wastes (e.g., feed bags and plastic containers) can be reused, and their return to suppliers shall be encouraged. When selling recyclable wastes to a local collector, the final destination of wastes shall be specified. The income generated by the sales of recyclable wastes should be used for providing incentives to employees for separating wastes and increasing the amount of recycling done on the farm. (7.7.2 - Guidance for implementation)

REFERENCES

1. AASC Shrimp Standard v1.0 - March 2014
https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Shrimp-Standard_v1.0_FINAL_Layout_changes.pdf
Indicators 5.3.3 and 7.7.2
2. ASC Shrimp Audit Manual v1.0 - March 2014
https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Shrimp-Audit-Manual_v1.0.pdf
Indicators 5.3.3 and 7.7.2

ESSENTIAL COMPONENT C.4.05

The standard prohibits the use of whole fish as a direct feed source in grow-out.

■ Anderson Cabot Center comment

ASC's shrimp standard does not include this requirement and instead relies on the claim that this Essential Component is not applicable because "*direct feeding is not used in commercial shrimp farming*".

The scope of ASC's standard identifies that it applies to all species and forms of marine shrimp farming, including extensive, semi-intensive, and intensive operations. Shrimp, particularly giant tiger prawns, used for export globally do include those raised under differing intensities and farm-made feeds, potentially utilizing chopped whole fish (trash fish), have been used in semi-intensive shrimp farming. In semi-intensive culture, feeds are used to supplement natural feed in the pond, and could still result in low feed conversion and feed fish equivalence ratios (FCR and FFER), while still creating a biosecurity risk. As such, we do not agree that the Essential Component is "not applicable" to shrimp farming certification. GSSI recognized shrimp standards should include a suitable prohibition on "wet fish" ingredients used in feed on both feed efficiency and biosecurity grounds.

■ GSSI response

The ASC Shrimp standard is in alignment with Essential Component C.4.05. In response to the comment by the Anderson Cabot Center, the scheme owner has provided the following response that is now posted on the ASC Interpretations Platform to clarify that direct feeding of whole fish is prohibited. The text of that statement is "ASC prohibits the use of whole fish as a direct source in grow-out, and only farms using manufactured feed can be certified." Based on this new statement, the conclusion has been modified from "not applicable" to "in alignment."

Conclusion on GSSI Essential Component C.4.05

Conclusion: The ASC Shrimp Standard is in alignment because the standard includes a statement on the ASC Interpretations Platform stating that "ASC prohibits the use of whole fish as a direct source in grow-out, and only farms using manufactured feed can be certified."

REFERENCES

1. ASC Interpretations Platform
<https://asc-portal.force.com/interpret/s/article/Q-A105-Shrimp-v1-1-manufactured-feed>
Q&A105_Shrimp_v1.1_manufactured feed

ESSENTIAL COMPONENT C.4.06

The standards prohibit aquatic feed protein from the same species and genus as the species being farmed.

■ Anderson Cabot Center comment

ASC's shrimp standard does not include this requirement and instead relies on the claim that "feed producers follow local feed regulations and prohibit protein from same species". This is an odd justification since a driving force behind the need for seafood certification is that local regulations are either incomplete or insufficiently enforced. While ASC does require auditors to check for legal compliance in Criterion 1.1.1, this only applies to the farm site and does not extend to feed. ASC's standard is insufficient to warrant consistency with this EC.

■ GSSI response

The ASC Shrimp standard is in alignment with Essential Component C.4.06. In response to the comment by the Anderson Cabot Center, the scheme owner has provided the following recent modification of an existing statement on the ASC Interpretations Platform to clarify that the standard prohibits aquatic feed protein from the same species and genus of the shrimp being farmed. The text of that statement is "ASC clarifies that fishmeal used by feed manufacture is not obtained from the same species and genus; ASC prohibits the use of marine

proteins from the same species and genus as the species being farmed. Audits includes that feed specifications and records shall be in place to demonstrate source from different species. Currently Shrimp feed producer's countries follow local legislations (e.g; Vietnam, Ecuador and Peru) that prohibit the use of feed protein sources from the same species or same genus as the cultured fish." Based on this modified statement, no changes were made to the conclusion of "in alignment" with C.4.06.

Conclusion on GSSI Essential Component C.4.06

Conclusion: The ASC Shrimp Standard is in alignment because the ASC Interpretations Platform includes the following statement:

" ASC clarifies that fishmeal used by feed manufacture is not obtained from the same species and genus; ASC prohibits the use of marine proteins from the same species and genus as the species being farmed. Audits includes that feed specifications and records shall be in place to demonstrate source from different species. Currently Shrimp feed producer's countries follow local legislations (e.g; Vietnam, Ecuador and Peru) that prohibit the use of feed protein sources from the same species or same genus as the cultured fish."

REFERENCES

2. AASC Interpretations Platform
<https://asc-portal.force.com/interpret/s/article/Q-A86-shrimp-v1-1>
Q&A86_Shrimp_V1.1_feed protein from the same species and genus

SUPPLEMENTARY COMPONENT C.4.04.2

The standard requires independent verification that the feed manufacturer only sources fishmeal and fish oil (greater than 1% content) from whole fish certified a standard benchmarked to be, at minimum, consistent with relevant FAO's ecolabelling guidelines.

■ Anderson Cabot Center comment

ASC's shrimp is not compliant with this Supplementary Component (SC) in three ways:

1. As clearly stated in the SC the standard "requires independent verification that the feed manufacturer" i.e., as it states in the Guidance section, "third party certification or audit of the feed manufacturer", neither of which the ASC shrimp standard requires for the farm level certification (which is different from the ASC salmon requirements).
2. In July 2017, ASC published an Interim position on Indicator 7.2.1a, the requirement for 100% fishmeal and fish oil used in feed to come from fisheries certified to a full ISEAL member, which resulted in the Indicator being "not required" as the industry could not meet this requirement within the five years following publication of the standard (in March, 2014). As such, this Indicator does not demonstrate consistency with this SC.
3. Future standards should not be allowed to demonstrate compliance with an EC or SC. As the above example shows, they cannot provide assurance these targets will be met by the intended deadline and representing them to be consistent with GSSI Components is therefore misleading and unfair to schemes that do require these issues are addressed at the time of certification.

■ GSSI response

Based on the comment of Anderson Cabot Center on the ASC Shrimp standard with respect to Supplementary Component C.4.04.2, the final conclusion has been changed to "not in alignment."

Conclusion on GSSI Supplementary Component C.4.04.2

Conclusion: The ASC Shrimp Standard is not in alignment.

SUPPLEMENTARY COMPONENT C.6.05.01

The standard requires that all manually stocked seed are principally from hatchery-reared (domesticated) broodstock.

▪ **Anderson Cabot Center comment**

Since the requirement for giant tiger prawns does not take effect until March 2020, the ASC shrimp standard is not in compliance with this SC. As stated for the feed SC above, GSSI should not be benchmarking standards based upon future compliance standards, since there is no assurance that these endpoints will not simply be removed or pushed back if a sufficient element of the industry could not meet them. This is also unfair to schemes that do require these issues are addressed at the time of certification.

▪ **GSSI response**

Based on the comment of Anderson Cabot Center on the ASC Shrimp standard with respect to Supplementary Component C.6.05.01, the final conclusion has been changed to “not in alignment.”

Conclusion on GSSI Supplementary Component C.6.05.01

Conclusion: The ASC Shrimp Standard is not in alignment.

SUPPLEMENTARY COMPONENT C.7.03.01

Where a non-established, non-native species has been shown to be or has potential to be a successful invasive species, the standard requires that they are controlled by strict effective escape impact prevention and mitigation measures.

▪ **Anderson Cabot Center comment**

As stated in the SC, control of non-native species should include strict escape impact prevention and mitigation measures. ASC does not require any mitigation measures, such as sterile, polyploidy, monosex shrimp or require physical isolation (i.e., an RAS facility) and is not, therefore, in compliance with this SC.

▪ **GSSI response**

Based on the comment of Anderson Cabot Center on the ASC Shrimp standard with respect to Supplementary Component C.7.03.01, the final conclusion has been changed to “not in alignment.”

Conclusion on GSSI Supplementary Component C.7.03.01

Conclusion: The ASC Shrimp Standard is not in alignment.

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.

Kindest regards,

A handwritten signature in black ink, appearing to read 'H. Wisse', written in a cursive style.

Herman Wisse
GSSI Managing Director