

Haarlem, 17th of February 2020

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Subject: Response to Public Consultation ASC Scope Extension

Dear Roel Bosma,

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 Wageningen University 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.4.9

The standard requires that appropriate records are kept on all feed use.

■ Roel Bosma comment

I plead for the inclusion of, next to the FFDRm, an average highest permissible threshold FCR. Because farmers themselves can easily calculate and monitor the FCR, while monitoring of FFDRm and eFCR is more complex. At my knowledge a FCR <1.1 is achievable for shrimp grow-out with less than 120 DOC and <1.3 for <180 DOC (Days of Culture), if farmers use best available technology and knowledge, and laws allow low protein:energy and high Carbon:Nitrogen ratios.

■ GSSI response

The ASC Shrimp standard is in alignment with Essential Component C.4.9. Based on the comment of Roel Bosma, no additional changes were made to the final conclusion.

The guidance statement for this Essential Component states that: “Appropriate records are expected to include feed source, feed Batch/Lot/ID number, date of purchase, feed conversion ratio (FCR), and, where appropriate, feed inclusion percentages of fishmeal and fish oil or a fish in: fish out ratio. Appropriate records are expected to be kept for each individual production unit. Verification of appropriate record keeping and suitable documentation from feed manufacturers is also expected.”.

Based on this guidance statement, this GSSI Essential Component requires that appropriate records be maintained but does not set limits on any of the items listed in the guidance. In other words, GSSI requires that benchmarked standards collect information on data, but do not place limits on them, e.g. maximum percentage of fishmeal or a maximum FIFO.

Your point is best directed to the scheme owner because limits are often established within certification standards. Indeed, the ASC Shrimp standard sets limits on FFDR. Your recommendations are best considered by the scheme owner as they go through their own internal review and revision process.

Conclusion on GSSI Essential Component C.4.9

Conclusion: The ASC Shrimp Standard is in alignment because the standard includes an indicator that requires the aquaculture facility sources feed from a manufacturer that assures the fish meal and fish oil used in the production of from aquaculture trimmings (if greater than 1% inclusion) can also be traceable back to the origin fishery and does not come from illegal, unreported, and unregulated fishing (I.U.U.) and does not contain species on the IUCN red list.

1) Fishmeal Forage Fish Dependency Ratio (FFDR_m) for grow-out. Requirement: < 1.35 P. vannamei / < 1.9 P monodom (7.4.1).

2) The fish meal is the determining factor for the FFER, as fish oil use in shrimp feed is very low. Asking farmers to achieve threshold eFCRs would align incentives around the following: accurate tracking of shrimp weight/biomass, good feed management to keep feed fresh and assure no waste prior to use, careful tracking of parameters to optimize feed uptake by shrimp presentation, frequency of offering, correct pellet size, time of feeding, etc.), and adjusting feeding rations based on feeding activity (7.4.2.a).

REFERENCES

1. ASC 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 7.4.1 and 7.4.2.a
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 7.4.1 and 7.4.2.a

ESSENTIAL COMPONENT C.8.01

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

▪ Roel Bosma comment

Given the exhaustive use of low quality plastic lining and huge quantities of other plastic, and the lack of either laws or effective recycling (and thus disposal in the (marine) environment without any consideration in the majority of Asian countries, I call upon a specific alignment for all ASC and GSSI aquaculture standards to include: No use of plastic lining, except for HDPE, plus hard and persistent proof of proper recycling of all types of non-biodegradable materials and equipment (tanks, containers, bags, tools, etcetera) in the operation.

▪ GSSI response

The ASC Shrimp standard is in alignment with Essential Component C.8.01. Based on the comment of Roel Bosma, no additional changes were made to the final conclusion.

GSSI concurs with the commenter that proper disposal of plastic liner material and recycling of non-biodegradable materials is desirable. The general issue of responsible waste disposal is an element of Essential Component C.3.01 and the associated Performance Area of Environmentally Responsible Infrastructure Construction, Waste Disposal and General Storage. Supplemental Component 3.01.1 addresses recycling programs and Supplemental Component 3.01.2 addresses a requirement for a general waste management system.

Regarding the specific issue of plastic liner disposal, as indicated in the previous comment, your point is best directed to the scheme owner because specific classes of waste materials can be addressed within certification standards. Your recommendations are best considered by the scheme owner as they go through their own internal review and revision process. It can be noted, however, that the current ASC Shrimp standard includes Indicator 7.7.2 that requires “responsible handling and disposal of wastes based on risk analysis and possibilities of recycling.”

Conclusion on GSSI Essential Component C.8.01

Conclusion: The ASC Shrimp Standard The ASC Shrimp Standard is in alignment because the standard includes an indicator (1.1.1) that requires compliance with local and national laws or regulations.

REFERENCES

3. 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
Indicator 1.1.1
4. 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
Indicator 1.1.1

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,



Herman Wisse
GSSI Managing Director