

Haarlem, 20<sup>th</sup> of October 2021

**Valeska Weymann**

Senior Expert/Technical Key Account Aquaculture  
GLOBALG.A.P.  
Spichernstr. 55  
50672 Cologne, Germany

Dear Valeska,

Many thanks for taking the time to provide your comments on the GSSI Benchmark Framework v2.0.

GSSI is committed to a transparent benchmark process with opportunity for engagement and comments. Following the consultation, the comments received from **GLOBALG.A.P.** and other stakeholders have been carefully reviewed by our Expert Working Groups. Responses to each of the comments are provided in this and other letters. After careful deliberations, the GSSI Steering Board concluded the comments had been sufficiently addressed and consequently, approved the Benchmark Framework v2.0.

Version 2.0 of the GSSI Global Benchmark Tool, which includes the Benchmark Framework v2.0, was successfully launched on October 20<sup>th</sup> during the GSSI Partners Meeting.

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. Answer from GSSI
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:

EWG: Expert Working Group  
EC: Essential Component  
SC: Supplementary Component

## ■ Section A–Governance

### ESSENTIAL COMPONENT A.1.03

#### **Component text**

The Scheme Owner operates to a documented set of governance policies and procedures specifying at least the following:

- Board or governance body election or appointment process,
- Board or governance body representation and Terms of Reference,
- Member categories (where applicable),
- Income generation or funding processes,
- An organizational structure,
- The decision-making processes of each governance body,
- Key personnel roles (responsibility and authority),
- Managing conflict of interest, and
- A conformity assessment program.

#### **Guidance text**

The Scheme Owner has policies/procedures available covering all aspects in this Essential Component except Member categories if not applicable.

Examples of evidence for scheme alignment:

- Statutes and by-laws, organizational chart, internal procedures, job descriptions, conflict of interest statements, quality assurance manuals.

#### ■ **Global G.A.P.**

What is meant here on quality assurance program?

#### ■ **GSSI response**

Based on the Public Consultation comments, the Component and Guidance text has been changed.

The Component and Guidance text has been amended to integrate better with A.1.6. Scheme Owners should facilitate the participation of stakeholders in the governance body or provide input to it. Furthermore, “Conformity assessment” has been replaced by “quality assurance program”, for vocabulary consistency within the document, and "Procedures or" before "manual" has been added to indicate more flexibility about document format.

Re Global G.A.P. comment: The Quality Assurance programme (or Conformity Assessment programme or Integrity Programme) is the programme to monitor and review the performance of certification bodies, auditors, companies to make sure they are in compliance with the certification programme requirements.

### **GSSI Essential Component A.1.03**

**Component text:** The Scheme Owner operates to a documented set of governance policies and procedures specifying at least the following:

- Board or governance body election or appointment process,
- Board or governance body representation and Terms of Reference,
- Member categories (where applicable),
- Income generation or funding processes,

- An organizational structure,
- The decision-making processes of each governance body,
- Key personnel roles (responsibility and authority),
- Managing conflict of interest, and
- A conformity assessment program.

The Scheme Owner operates to a documented set of governance policies and procedures specifying at least the following:

- Board or governance body election or appointment process,
- Process to facilitate participation of stakeholders
- Board or governance body representation and Terms of Reference,
- Member categories (where applicable),
- Income generation or funding processes,
- An organizational structure,
- The decision making processes of each governance body,
- Key personnel roles (responsibility and authority),
- Managing conflict of interest, and
- A quality assurance program.

**Guidance text:** The Scheme Owner has policies/procedures available covering all aspects in this Essential Component except Member categories if not applicable.

Examples of evidence for scheme alignment:

- Statutes and by-laws, organizational chart, internal procedures, job descriptions, conflict of interest statements, quality assurance manuals

The Scheme Owner has policies/procedures available covering all aspects in this Essential Component except Member categories if not applicable.

Examples of evidence for scheme alignment:

- Statutes and by-laws, organizational chart, internal procedures, job descriptions, conflict of interest statements, quality assurance procedures or manual.
- Online process document for submission of input, governance body selection process and stakeholder composition, review of previous stakeholder inputs and verify if/how this reached top governance.

## REFERENCES

38 [61, 63, 64] [FAO draft evaluation Framework Aquaculture]  
ISO 17067 Section 6.7

### ESSENTIAL COMPONENT A.3.23

#### **Component text**

The Scheme Owner shall make translations of the standard into English and in the most relevant/appropriate languages, to ensure access and transparency, freely available and authorizes translations into other languages where necessary for credible implementation of the standard.

Documents translated shall include standard setting procedures, most recent work program, draft and final versions of the standard.

- **Global G.A.P.**

Translations on setting procedures, work program, and draft versions is an extremely resources demand. The criteria shall focus on the standards as such, e.g. Final versions of the standards.

- **GSSI response**

Based on Global G.A.P.'s comment, the Component text has been changed.

The need for translation into other languages has been deleted, as well as the requirement of translation of documents other than the standard itself.

### **GSSI Essential Component A.3.23**

**Component text:** The Scheme Owner shall make translations of the standard into English and in the most relevant/appropriate languages, to ensure access and transparency, freely available and authorizes translations into other languages where necessary for credible implementation of the standard.

Documents translated shall include standard setting procedures, most recent work program, draft and final versions of the standard.

*The Scheme Owner shall make translations of the standard into English, and in the most relevant/appropriate languages, to ensure access and transparency, freely available.*

**Guidance text:** The Scheme Owner has a mechanism in place to identify the applicability and need for translations based on geographical scope of certification, as well as the geographical range of certified entities and products.

The process includes an assessment in order to ensure accurate translation.

Examples of evidence for scheme alignment:

- Internal procedure, quality handbook, current language availability, work plan of translations, process for ensuring accuracy of translations.

### **REFERENCES**

Adapted from FAO e 53 [75]

ISEAL Standard Setting Code 5.7.3

- **Section C – Aquaculture**

#### **ESSENTIAL COMPONENT C.1.08**

##### ***Component text***

The standard requires the aquaculture facility to have operational fish health management practices. Evidence must be shown that these address the following elements (where relevant to the species, scale, and production system covered by the Standard's scope):

- Effective biosecurity
- Identification and use of suitable available vaccines
- Introductions and transfers of farmed animals (where relevant, which is overseen by an aquatic animal health professional).

### **Guidance text**

It is expected that the standard will contain sufficient elements and/ or audit of culture practices for an operational program relative to the scale, species, and production systems covered by the standard's scope, including a focus on disease prevention (e.g. the use of vaccines). The content of the measures are expected to be overseen (but not necessarily full time employment) of an aquatic animal health professional.

#### ▪ **Global G.A.P.**

In bullet point no. 3, a definition of aquatic animal health professional is needed because if the transfer of farmed animals is overseen by a veterinarian, this is not practical for farm operation because the transferring can occur many times per crop. One veterinarian in farm will not be sufficient. The aquatic animal health professional is expected to sign the aquatic animal health plan but it is not feasible to have a professional at the farm at all times.

#### ▪ **GSSI response**

Based on the Public Consultation comments, the Guidance text has been changed.

The EWG provides the following responses to the comments:

- A definition for "suitable" has been included in the final Guidance text.
- There is a definition of an aquatic animal health professional in the BM Tool Glossary (based on OIE text)
- Regarding the concern about need for excessive veterinarian presence, it should be noted that being "overseen" presumably does not require continual physical presence, as it is the system(s) in place that matters.

### **GSSI Essential Component C.1.08**

**Component text:** The standard requires the aquaculture facility to have operational fish health management practices. Evidence must be shown that these address the following elements (where relevant to the species, scale, and production system covered by the Standard's scope):

- Effective biosecurity
- Identification and use of suitable available vaccines
- Introductions and transfers of farmed animals (where relevant, which is overseen by an aquatic animal health professional.

**Guidance text:** It is expected that the standard will contain sufficient elements and/ or audit of culture practices for an operational program relative to the scale, species, and production systems covered by the standard's scope, including a focus on disease prevention (e.g. the use of vaccines). The content of the measures are expected to be overseen (but not necessarily full time employment) of an aquatic animal health professional.

It is expected that the standard will contain sufficient elements and/ or audit of culture practices for an operational program relative to the scale, species, and production systems covered by the standard's scope, including a focus on disease prevention (e.g. the use of vaccines). The content of the measures are expected to be overseen (but not necessarily full time employment) of an aquatic animal health professional. Suitable vaccines are defined as those that have been shown to be effective against diseases that negatively impact the species and production system concerned and that can be used economically.

## REFERENCES

Paragraphs 19, 20, & 22 of the Technical Guidelines on Aquaculture.

### ESSENTIAL COMPONENT C.2.02

#### **Component text**

The standard requires appropriate controls for all chemicals, incl. veterinary drugs, that enter the environment during or after use (whether already covered by GSSI Essential Components or not) in order to minimize adverse impacts on environmental quality. Manufacturer's guidance or equivalent directions should be followed, and where appropriate, chemicals that pose a high risk of adverse impacts to environmental quality should be specifically defined by the standard.

#### **Guidance text**

It is expected that the standard will require all chemicals used by the aquaculture facility and that will enter the environment are at least used according to the manufacturer's guidance (such as on label requirements or Safety Data Sheets (SDS) or, in the case of veterinary drugs, the guidance of the aquatic animal health professional to prevent adverse impacts upon the environment.

Chemicals that pose a high risk of adverse impacts to environmental quality which should be specifically defined by the standard (e.g., copper-based anti-foulant treatments in marine cage aquaculture or anti-parasite or anti-microbe bath treatments ) or identified through a risk based self-assessment by the farmer (e.g., an environmental risk assessment)-- it is expected that the standard or the risk-assessment will define any necessary additional requirements to minimize the impacts (e.g., EQS limits for copper residues in the benthic environment).

#### ▪ **Global G.A.P.**

The chemical industry is changing all the time and it is very difficult to list all current chemicals with high impact to the environment. At GLOBALG.A.P. we request that all chemicals in store are verified and that shall have available product specification and material safety data sheets (MSDS). Identify the chemicals that have high impact to the environment is not feasible.

#### ▪ **GSSI response**

Based on Global G.A.P.'s comment, the Component and Guidance text has been changed.

To allow flexibility so that rapid change in the perceived range of high-risk chemicals can be accommodated, the component and guidance text will be changed. Additionally, there will be a reference to a classification system as an example of an acceptable reference.

### GSSI Essential Component C.2.02

**Component text:** The standard requires appropriate controls for all chemicals, incl. veterinary drugs, that enter the environment during or after use (whether already covered by GSSI Essential Components or not) in order to minimize adverse impacts on environmental quality. Manufacturer's guidance or equivalent directions should be followed, and where appropriate, chemicals that pose a high risk of adverse impacts to environmental quality should be specifically defined by the standard.

The standard requires appropriate controls for all chemicals, incl. veterinary drugs, that enter the environment during or after use (whether already covered by GSSI Essential Components or not) in order to minimize adverse impacts on environmental quality. Manufacturer's guidance or equivalent directions should be followed, and where appropriate, relevant examples of chemicals that pose a high risk of adverse impacts to environmental quality should be specifically defined by the standard.

**Guidance text:** It is expected that the standard will require all chemicals used by the aquaculture facility and that will enter the environment are at least used according to the manufacturer's guidance (such as on label requirements or Safety Data Sheets (SDS) or, in the case of veterinary drugs, the guidance of the aquatic animal health professional to prevent adverse impacts upon the environment.

Chemicals that pose a high risk of adverse impacts to environmental quality which should be specifically defined by the standard (e.g., copper-based anti-foulant treatments in marine cage aquaculture or anti-parasite or anti-microbe bath treatments ) or identified through a risk based self-assessment by the farmer (e.g., an environmental risk assessment)-- it is expected that the standard or the risk-assessment will define any necessary additional requirements to minimize the impacts (e.g., EQS limits for copper residues in the benthic environment).

It is expected that the standard will require all chemicals used by the aquaculture facility and that will enter the environment are at least used according to the manufacturer's guidance (such as on label requirements or Safety Data Sheets (SDS) or, in the case of veterinary drugs, the guidance of the aquatic animal health professional to prevent adverse impacts upon the environment.

Chemicals that pose a high risk of adverse impacts to environmental quality, examples of which should be specifically defined by the standard (e.g., copper-based anti-foulant treatments in marine cage aquaculture or anti-parasite or anti-microbe bath treatments ), accepting that perceptions regarding high risk and the chemicals involved are subject to rapid change, or identified through a risk based self-assessment by the farmer (e.g., an environmental risk assessment)--or through reference to a recognized relevant classification system (eg. the UN Globally Harmonized System of Classification and Labelling of Chemicals (GHS)).It is expected that the standard or the risk-assessment will define any necessary additional requirements to minimize the impacts (e.g., EQS limits for copper residues in the benthic environment).

## REFERENCES

Paragraph 52 of the Technical Guidelines on Aquaculture Certification.

## ESSENTIAL COMPONENT C.4.06

### **Component text**

The standard prohibits aquatic feed protein from the same species and genus as the species being farmed.

#### ▪ **Global G.A.P.**

Feed specifications and records shall be in place and they shall demonstrate source from different species. In case protein elements are obtained from the same species: protein hydrolysates (peptide size) of the same species are tested to verify <10,000 daltons are permissible; documentation from feed suppliers shall be in place. This last sentence is based on EU legislation.



- **GSSI response**

Based on the Public Consultation comments, no change has been made.

Following the EWG comments focusing on the need to apply the precautionary principle after experiences like that of “madcow” disease as well as clear statements regarding its unacceptability in a relevant FAO publication on this issue (Principle 9, Guideline 9.1 in FAO Technical Guidelines for Responsible Fisheries: Aquaculture Development, Supplement 5. Use of Wild Fish as Feed in Aquaculture), no change to the Component or Guidance text will be made. This issue will be flagged to GSSI as a matter to likely require addressing again in a future revision.

#### **GSSI Essential Component C.4.06**

**Component text:** The standard prohibits aquatic feed protein from the same species and genus as the species being farmed.

**Guidance text:** Verification is expected to include a review of evidence (e.g., documentation, self-declaration by the feed manufacturer).

#### **REFERENCES**

Paragraph 52 of the Technical Guidelines on Aquaculture Certification  
FAO (2011) Aquaculture Development. 5. Use of Wild Fish as Feed in Aquaculture Principle 9.1

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,

**Eva van Heukelom**

Technical Manager