

Haarlem, 10<sup>th</sup> October 2023

**GLOBAL G.A.P.**

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Subject: Response to GLOBAL G.A.P. comments on Aquaculture Stewardship Culture (ASC) Public Consultation

Dear Pitchaya,

Many thanks for taking the time to provide your comments on the GSSI Benchmark Report for the Aquaculture Stewardship Council (ASC).

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 Aquaculture Stewardship Council is set out below.

▪ **Guidelines:**

The response to each of the comments is structured as follows:

1. Description of the component: Essential or Supplementary and the corresponded 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:

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

## ■ Section C – Aquaculture (Salmon Standard)

### Essential Component C.1.07

*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):*

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

## ■ GLOBAL G.A.P. comment

Evidence provided does not mention "3. Introductions and transfers of farmed animals (where relevant, which is overseen by an aquatic animal health professional."

## ■ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C1.07, however further evidence has been added to ensure alignment.

Indicator 8.13 specifically covers the introduction of animals as smolts to an on-growing system should be added to ensure alignment. Salmon Standard V 1.3, Indicator 8.13 & Audit Manual V 1.3 Indicator 8.13 'Percentage of smolt groups tested for select diseases of regional concern prior to entering the grow-out phase on farm' = 100%

Note – Instruction to Clients for Indicator 8.13 – Testing of Smolt for Select Diseases, i.e. 'The designated veterinarian to the smolt supplier is required to evaluate, based on scientific criteria and publicly available information, which diseases should be tested for. This analysis shall include an evaluation of whether clinical disease or a pathogen carrier state in fresh water is deemed to have a negative impact on the grow-out phase, thereby disqualifying a smolt group from being transferred. The analysis must be available to the CAB upon request.'

The following indicators have been added to specifically address identification and use of suitable vaccines;

- Salmon Standard V 1.3, Indicator 8.12 & Audit Manual V 1.3 Indicator 8.12 'Percentage of fish that are vaccinated for selected diseases that are known to present a significant risk in the region and for which an effective vaccine exists' = 100%

### **Conclusion on GSSI Essential Component C.1.07**

#### **Conclusion:**

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

- 1) a Fish Health Management Plan is developed and implemented - for both the grow-out site and the smolt site - that, among other items, covers this topic. The Farm Health Management Plan is developed in collaboration with, and signed-of by, a veterinarian, and
- 2) compliant smolts are 100% vaccinated for selected diseases that are known to present a significant risk in the region and for which an effective vaccine exists.

## REFERENCES

1. ASC Salmon Standard V 1.3, Indicators 5.1.1, 5.1.3, 5.4.3, 5.4.4, **8.12**, 8.18  
[https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard\\_v1.3\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard_v1.3_Final.pdf)
2. Audit Manual ASC Salmon Standard V 1.3, Indicators 5.1.1, 5.1.3, 5.4.3, 5.4.4, **8.12**, 8.18  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual\\_v1.3.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual_v1.3.pdf)

### Supplementary Component C.1.07.03

*The standard requires the aquaculture facility to establish, implement, and maintain a written Aquatic Animal Health Management Plan (AAHMP) which is overseen by an aquatic animal health professional, and at a minimum, is compliant with the following GSSI Components; C.1.01, C.1.02, C.1.03, C.1.04, C.1.05, C.1.06, C.1.07, C.1.08, C.1.09, C.1.10.*

#### ■ GLOBAL G.A.P. comment

See comment C.1.07.

"Evidence provided does not mention introductions and transfer of farmed animals (where relevant, which is overseen by an aquatic animal health professional)"

#### ■ GSSI response

Following the comments and changes made in C.1.07, the same additional reference has been added to C.1.07.03 to ensure alignment.

The following indicators have been added to specifically address identification and use of suitable vaccines;

- Salmon Standard V 1.3, Indicator 8.12 & Audit Manual V 1.3 Indicator 8.12 'Percentage of fish that are vaccinated for selected diseases that are known to present a significant risk in the region and for which an effective vaccine exists' = 100%

### Conclusion on GSSI Supplementary Component C.1.07.03

#### Conclusion:

The ASC Salmon Standard is in alignment because the standard includes an indicator that requires evidence of a fish health management plan for the identification and monitoring of fish diseases, parasites and environmental conditions relevant for good fish health, including implementing corrective action when required. The standard requires site visits by a designated veterinarian at least four times a year, and by a fish health manager at least once a month. A designated veterinarian is defined as the professional responsible for health management on the farm who has the legal authority to diagnose disease and prescribe medication. In some countries such as Norway, a fish health biologist or other professional has equivalent professional qualifications and is equivalent to a veterinarian for purposes of these standards.

#### REFERENCES

1. ASC Salmon Standard V 1.3, Indicators 5.1.1, 5.1.2 and **8.12**  
[https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard\\_v1.3\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard_v1.3_Final.pdf)
2. Audit Manual ASC Salmon Standard V 1.3, Indicators 5.1.1, 5.1.2 and **8.12**  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual\\_v1.3.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual_v1.3.pdf)

### Supplementary Component C.1.07.05

*The standard requires that the aquatic animals are vaccinated against all relevant/important diseases for which vaccines are both available and effective.*

- **GLOBAL G.A.P. comment**

Indicator 8.1.2 in the ASC Salmon Standard V 1.3. does not exist.

- **GSSI response**

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C1.07.05., however a reference was corrected.

Indicator 8.1.2 and has now been changed to Indicator 8.12. Following this change, ASC remains in alignment with Component 1.07.05.

#### **Conclusion on GSSI Supplementary Component C.1.07.05**

##### **Conclusion:**

The ASC Salmon Standard is in alignment because there is an indicator that requires that all smolt are vaccinated for selected diseases in a given area based on the availability and efficacy of vaccines.

##### **REFERENCES**

1. ASC Salmon Standard V 1.3, Indicators **8.12**  
[https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard\\_v1.3\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard_v1.3_Final.pdf)
3. Audit Manual ASC Salmon Standard V 1.3, Indicators **8.12**  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual\\_v1.3.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual_v1.3.pdf)

### Essential Component C.2.01

*The standard requires the establishment, implementation and maintenance of an appropriate system for the application of chemicals and veterinary drugs.*

#### ■ GLOBAL G.A.P. comment

Evidence does not cover: "The system is expected to ensure that the application of the product follows the instructions of the manufacturer or other competent authority. Verification that the system is operational is also expected."

#### ■ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C2.01.

The referenced ASC Salmon Standard V 1.3 Indicator 8.14 & the Salmon Audit Manual V 1.3 Indicator 8.14 covers sufficiently the requirements of the above quoted Guidance text of Indicator C.2.01. Therefore, there is sufficient evidence to permit alignment.

#### **Conclusion on GSSI Essential Component C.2.01**

##### **Conclusion:**

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

- 1) evidence of a fish health management plan for the identification and monitoring of fish diseases, parasites and environmental conditions relevant for good fish health, including implementing corrective action when required,
- 2) site visits by a designated veterinarian at least four times a year, and by a fish health manager at least once a month,
- 3) on-farm documentation that includes, at a minimum, detailed information on all chemicals and therapeutants used during the most recent production cycle, the amounts used (including grams per ton of fish produced), the dates used, which group of fish were treated and against which diseases, proof of proper dosing, and all disease and pathogens detected on the site,
- 4) no allowance for use of therapeutic treatments that include antibiotics or chemicals that are banned in any of the primary salmon producing or importing countries,
- 5) 100% of medication events to be prescribed by a veterinarian, and
- 6) no allowance for use of antibiotics listed as critically important for human medicine by the World Health Organization (WHO).

##### **REFERENCES**

1. ASC Salmon Standard V 1.3, Indicators 5.1.1, 5.1.2, 5.2.1, 5.2.2, 5.2.3, 5.2.12, 8.11, 8.14, 8.15  
[https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard\\_v1.3\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard_v1.3_Final.pdf)
2. Audit Manual ASC Salmon Standard V 1.3, Indicators 5.1.1, 5.1.2, 5.2.1, 5.2.2, 5.2.3, 5.2.12, 8.11, 8.14, 8.15  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual\\_v1.3.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual_v1.3.pdf)

## Essential Component C.2.02

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

### ■ GLOBAL G.A.P. comment

Evidence does not contain information regarding "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."

### ■ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C2.02, however further evidence has been added to ensure alignment.

It has been agreed that there is currently no evidence to demonstrate the above, however there are Indicators which cover these points in the ASC Salmon Standard V 1.3 and Audit Manual V 1.3. The following indicators are being added to the references:

- Re. chemicals:
  - Indicator 2.2.6 '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.'
  - Indicator 8.14. relating to smolt facilities 'Detailed information, provided by the designated veterinarian, of all chemicals and therapeutants used during the smolt production cycle, the amounts used (including grams per ton of fish produced), the dates used, which group of fish were treated and against which diseases, proof of proper dosing and all disease and pathogens detected on the site.'
- Re. veterinary drug usage:
  - Indicator 5.2.3. defines 100% of medication events are prescribed by a veterinarian.
  - Indicator 8.14. relating to smolt facilities 'Detailed information, provided by the designated veterinarian, of all chemicals and therapeutants used during the smolt production cycle, the amounts used (including grams per ton of fish produced), the dates used, which group of fish were treated and against which diseases, proof of proper dosing and all disease and pathogens detected on the site.'

The following references have been added:

- ASC Salmon Standard V 1.3, Indicators **5.2.3** and **8.14**,  
[https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard\\_v1.3\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard_v1.3_Final.pdf)
- Audit Manual ASC Salmon Standard V 1.3, Indicators **5.2.3** and **8.14**,  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual\\_v1.3.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual_v1.3.pdf)

## Conclusion on GSSI Essential Component C.2.02

### Conclusion:

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

- 1) farms to publicly report the weighted number of medicinal treatments, parasiticide loads and benthic parasiticide residue levels
- 2) farms to be at or below country entry levels for weighted numbers of medicinal treatments
- 3) no allowance for prophylactic use of antimicrobial treatments,
- 4) no allowance for use of antibiotics listed as critically important for human medicine by the World Health Organization (WHO),
- 5) if more than one antibiotic treatment is used in the most recent production cycle, demonstration that the antibiotic load is at least 15% less than that of the average of the two previous production cycles.
- 6) evidence of compliance with the OIE Aquatic Animal Health Code,
- 7) for farms that use copper-treated nets, evidence that nets are not cleaned or treated in situ in the marine environment,
- 8) for any farm that cleans nets at on-land sites, evidence that net-cleaning sites have effluent treatment,
- 9) for farms that use copper nets or copper-treated nets, evidence of testing for copper level in the sediment outside of the AZE, following methodology in Appendix I-1,
- 10) evidence that copper levels are <34 mg Cu/kg dry sediment weight, OR, in instances where the Cu in the sediment exceeds 34 mg Cu/kg dry sediment weight, demonstration that the Cu concentration falls within the range of background concentrations as measured at three reference sites in the water body,
- 11) evidence that the type of biocides used in net antifouling are approved according to legislation in the European Union, or the United States, or Australia, and
- 12) 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.
- 13) The farm to reduce the Weighted Number of Medicinal Treatments, after achieving indicator 5.2.6, with 25% per 2 years until the WNMT is at or below the Global Level
- 14) The farm to monitor parasiticide residue levels annually in the benthic sediment directly outside the AZE.
- 15) no more than 3 antibiotic treatments per production cycle

### REFERENCES

1. ASC Salmon Standard V 1.3, Indicators 2.2.6, 5.2.3, 5.2.5, 5.2.6, 5.2.7, 5.2.10, 5.2.11, 5.2.12, 5.2.13, 5.2.14, 5.4.3, 8.14, Criterion 4.7 :  
[https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard\\_v1.3\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard_v1.3_Final.pdf)
2. Audit Manual ASC Salmon Standard V 1.3, Indicators 2.2.6, 5.2.3, 5.2.5, 5.2.6, 5.2.7, 5.2.10, 5.2.11, 5.2.12, 5.2.13, 5.2.14, 5.4.3, 8.14, Criterion 4.7 :  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual\\_v1.3.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual_v1.3.pdf)



### 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. Relevant aspects include proper management of all chemicals, fuels and feeds including their safe storage.*

#### ■ GLOBAL G.A.P. comment

The evidence does not provide information regarding proper management of fuels and feeds including their safe storage, as per guidance text:

- “- Appropriate storage of feed (e.g., stored separately from sources of contamination, accurately labeled, keeping medicated and nonmedicated feed separated.)
- Appropriate pest control (e.g., prevent contamination of feed, chemicals by rodents or insects etc.)”

#### ■ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C3.01

ASC is considered to be in alignment with Component C3.01, due to Indicator 2.2.6 in ASC Salmon Standard V1.3. It states '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.' Indicator 2.2.6 is a general indicator which addresses the requirement to have a system in place focusing on maintaining good culture practices and hygienic conditions at the farm. Explicitly included in the scope of this required system are chemicals and veterinary drugs but it is not limited to these two elements since the final aim of the required system is to ensure that adverse impacts due to the farm activities on the environment are minimised. GSSI consider this to be sufficient evidence of appropriate storage of feed, including the avoidance of pests and thus ASC is in alignment with Component C3.01.

### **Conclusion on GSSI Essential Component C.3.01**

#### **Conclusion:**

The ASC Salmon 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,
- 2) presence and evidence of a functioning policy for proper and responsible treatment of non- biological waste from production (e.g., disposal and recycling),
- 3) evidence that non-biological waste (including net pens) from grow-out site is either disposed of properly or recycled,
- 4) for any farm that cleans nets at on-land sites, evidence that net-cleaning sites have effluent treatment,
- 5) 100% of dead fish removed and disposed of in a responsible manner,
- 6) percentage of workers trained in health and safety practices, procedures and policies on a yearly basis, and
- 7) presence of a health and safety risk assessment and evidence of preventive actions taken.

## REFERENCES

1. ASC Salmon Standard V 1.3, Indicators 2.2.6, 4.5.1, 4.5.2, 4.7.2, 5.1.3, 6.5.1, and 6.5.3:  
[https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard\\_v1.3\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard_v1.3_Final.pdf)
2. Audit Manual ASC Salmon Standard V 1.3, Indicators 2.2.6, 4.5.1, 4.5.2, 4.7.2, 5.1.3, 6.5.1, and 6.5.3:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual\\_v1.3.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual_v1.3.pdf)

### Essential Component C.4.02

*The standard requires the aquaculture facility to source feed from a manufacturer who produces feed that excludes fishmeal and fish oil from endangered species and is validated as such.*

#### ■ GLOBAL G.A.P. comment

Indicator 4.3.4 only specifies feed containing fishmeal and/or fish oil originating from by-products.

Can evidence be provided as per guidance text "Verification is expected to include a review of evidence (e.g., documentation, self-declaration by the feed manufacturer). The standard is expected to apply to other relevant marine feed ingredients (e.g., algae, krill, and squid) and to whole fish and fishery byproducts. "

#### ■ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C4.02.

The requirement of evidence for this Indicator is specified in the Salmon Audit Manual Indicator 4.3.4. and 4.3.5. i.e. Compliance Criteria and Auditor Evaluation and no new evidence has been presented that would affect ASC's alignment with C.4.02.

### Conclusion on GSSI Essential Component C.4.02

#### Conclusion:

The ASC Salmon Standard is in alignment because the standard includes an indicator that requires: 1) that feed does not contain fishmeal and/or fish oil originating from: by-products or trimmings from Illegal, Unreported and Unregulated (IUU) catch or from fish species that are categorized as vulnerable, endangered or critically endangered, according to the International Union for Conservation of Nature (IUCN) Red List of Threatened Species, whole fish and fish meal from the same species and family as the species being farmed.  
2) Presence and evidence of a responsible sourcing policy for the feed manufacturer for marine ingredients that includes a commitment to continuous improvement of source fisheries.

## REFERENCES

1. ASC Salmon Standard V 1.3, Indicator 4.3.4, 4.3.5  
[https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard\\_v1.3\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard_v1.3_Final.pdf)
2. Audit manual ASC Salmon Standard V 1.3, Indicator 4.3.4, 4.3.5  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual\\_v1.3.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual_v1.3.pdf)

### Essential Component C.4.03

*The standard requires the aquaculture facility to source feed from a manufacturer that prohibits the use of fishmeal and fish oil from illegal, unreported, and unregulated fishing (I.U.U.).*

#### ■ GLOBAL G.A.P. comment

Indicator 4.3.4 only specifies feed containing fishmeal and/or fish oil originating from by-products.

Can evidence be provided as per guidance text "Verification is expected to include a review of evidence (e.g., documentation, self-declaration by the feed manufacturer). The standard is expected to apply to other relevant marine feed ingredients (e.g., algae, krill, and squid) and to whole fish and fishery byproducts. "

#### ■ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C4.03.

The requirement of evidence for this Indicator is specified in the Salmon Audit Manual Indicator 4.3.4. and 4.3.5. i.e. Compliance Criteria and Auditor Evaluation. Therefore there is sufficient evidence to permit alignment.

#### **Conclusion on GSSI Essential Component C.4.03**

##### **Conclusion:**

The ASC Salmon Standard is in alignment because the standard includes

- 1) an indicator that requires that feed does not contain fishmeal and/or fish oil originating from: by-products or trimmings from Illegal, Unreported and Unregulated (IUU) catch or from fish species that are categorized as vulnerable, endangered or critically endangered, according to the International Union for Conservation of Nature (IUCN) Red List of Threatened Species, whole fish and fish meal from the same species and family as the species being farmed.
- 2) Presence and evidence of a responsible sourcing policy for the feed manufacturer for marine ingredients that includes a commitment to continuous improvement of source fisheries.

##### **REFERENCES**

1. ASC Salmon Standard V 1.3, Indicator 4.3.4, 4.3.5  
[https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard\\_v1.3\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard_v1.3_Final.pdf)
2. Audit Manual ASC Salmon Standard V 1.3, Indicator 4.3.4, 4.3.5  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual\\_v1.3.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual_v1.3.pdf)

### Supplementary Component C.4.04.01

*The standard requires independent verification that the feed manufacturer sources, in cases where whole fish ingredients are greater than 1% of content;*

*- fishmeal and fish oil that are traceable back to the species, fishery and country of origin, and  
- fishmeal and fish oil with less risk of detrimental environmental impacts, such as those certified to a standard benchmarked at minimum consistent with relevant FAO's ecolabelling guidelines and that uncertified sources must be identified as low risk by independent risk assessment or must come from sources that are part of an effective Fishery Improvement Project (FIP) towards a suitable certification or that have been assessed to show limited impacts on stock status and ecosystem impacts as defined in Principle 3 of the FAO (2011). Aquaculture Development. 5. Use of Wild Fish as Feed in Aquaculture.*

#### ■ GLOBAL G.A.P. comment

Evidence does not contain a requirement for a 3rd party certification or audit of the feed manufacturer, as per guidance text:

"Verification is expected to include a 3rd party certification or audit of the feed manufacturer. The standard is expected to apply to other relevant marine feed ingredients (e.g., algae, krill, and squid) and to whole fish."

Also the ASC feed standard is not yet obligatory, as producers have until January 14th 2025 to transition to ASC compliant feed, as per: <https://asc-aqua.org/producers/farm-standards/feed-standard/>

#### ■ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C4.04.01.

The Salmon Audit Manual Indicator. 4.1.1.c. and 4.1.1.C., contains sufficient instructions that cover auditing of feed producers 'by an independent auditing firm or a conformity assessment body against a recognized standard which substantially incorporate requirements for traceability' – see Instruction to Clients for Indicators 4.1.1 through 4.4.2 - Sourcing of Responsibly Produced Salmon Feeds.

### **Conclusion on GSSI Supplementary Component C.4.04.01**

#### **Conclusion:**

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

- 1) evidence of traceability, demonstrated by the feed producer, of feed ingredients that make up more than 1% of the feed,
- 2) the FishSource score for the fishery(ies) from which all marine raw material in feed is derived. Requirement: All individual scores  $\geq 6$ , and biomass score  $\geq 6$ ,
- 3) demonstration of third- party verified chain of custody and traceability for the batches of fishmeal and fish oil
- 4) feed containing fishmeal and/or fish oil originating from: none by-products or trimmings from Illegal, Unregulated and Unreported (IUU) catch or from fish species that are categorized as vulnerable, endangered or critically endangered, according to the International Union for Conservation of Nature (IUCN) Red List of Threatened Species, whole fish and fish meal from the same species and family as the species being farmed,
- 5) presence and evidence of a responsible sourcing policy for the feed manufacturer for marine ingredients that includes a commitment to continuous improvement of source fisheries, and

6) the policy should be written and include an 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 Food and Agriculture Organisation of the United Nations' (FAO) eco-labelling guidelines or by identified independent risk assessment.

#### **REFERENCES**

1. ASC Salmon Standard V 1.3, Indicator 4.1.1, 4.3.2, 4.3.3, 4.3.4 and 4.3.5.; 4.4.1  
[https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard\\_v1.3\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard_v1.3_Final.pdf)
2. Audit Manual ASC Salmon Standard V 1.3, Indicator 4.1.1, 4.3.2, 4.3.3, 4.3.4 and 4.3.5.; 4.4.1  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual\\_v1.3.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual_v1.3.pdf)

## Supplementary Component C.4.04.02

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

### ■ GLOBAL G.A.P. comment

Evidence provided does not clarify "Verification is expected to include a 3rd party certification or audit of the feed manufacturer. The standard is expected to apply to other relevant marine feed ingredients (e.g., algae, krill, and squid) and to whole fish."

Also see comment C.4.02 and C4.03:

Indicator 4.3.4 only specifies feed containing fishmeal and/or fish oil originating from by-products.

Can evidence be provided as per guidance text "Verification is expected to include a review of evidence (e.g., documentation, self-declaration by the feed manufacturer). The standard is expected to apply to other relevant marine feed ingredients (e.g., algae, krill, and squid) and to whole fish and fishery byproducts. "

### ■ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C4.04.02.

The Salmon Audit Manual Indicator. 4.1.1.c. and 4.1.1.C., contains sufficient instructions that cover auditing of feed producers 'by an independent auditing firm or a conformity assessment body against a recognized standard which substantially incorporate requirements for traceability' – see Instruction to Clients for Indicators 4.1.1 through 4.4.2 - Sourcing of Responsibly Produced Salmon Feeds.

### **Conclusion on GSSI Supplementary Component C.4.04.02**

#### **Conclusion:**

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

- 1) evidence of traceability, demonstrated by the feed producer, of feed ingredients that make up more than 1% of the feed,
- 2) prior to achieving 4.3.1, the FishSource score for the fishery(ies) from which all marine raw material in feed is derived. Requirement: All individual scores  $\geq 6$ , and biomass score  $\geq 6$ ,
- 3) prior to achieving 4.3.1, demonstration of third- party verified chain of custody and traceability for the batches of fishmeal and fish oil which are in compliance with 4.3.2,
- 4) feed containing fishmeal and/or fish oil originating from: none by-products or trimmings from Illegal, Unregulated and Unreported (IUU) catch or from fish species that are categorized as vulnerable, endangered or critically endangered, according to the International Union for Conservation of Nature (IUCN) Red List of Threatened Species, whole fish and fish meal from the same species and family as the species being farmed,
- 5) presence and evidence of a responsible sourcing policy for the feed manufacturer for marine ingredients that includes a commitment to continuous improvement of source fisheries, and
- 6) the policy should be written and include an 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 eco-labelling guidelines or by identified independent risk assessment.

## REFERENCES

1. ASC Salmon Standard V 1.3, Indicator 4.1.1, 4.3.2, 4.3.3, 4.3.4 and 4.3.5:  
[https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard\\_v1.3\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard_v1.3_Final.pdf)
2. Audit Manual ASC Salmon Standard V 1.3, Indicator 4.1.1, 4.3.2, 4.3.3, 4.3.4 and 4.3.5:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual\\_v1.3.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual_v1.3.pdf)



### Essential Component C.4.05

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

- **GLOBAL G.A.P. comment**

The link provided is not working. Are variance-interpretation-platform available to be reviewed by the public?

- **GSSI response**

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C4.05, however, the link in the reference list has been updated.

ASC has reported a recent update to their website, which has caused this error. Please see revised link here:  
<https://www.asc-aqua.org/what-you-can-do/get-certified/variance-request-interpretation-platform/QA0026/>

#### **Conclusion on GSSI Essential Component C.4.05**

##### **Conclusion:**

The ASC Salmon Standard is in alignment because it has clarified via QA 26 that raw, whole fish or parts thereof are not permitted under the Salmon Standard.

ASC intends to clarify this requirement in its upcoming Salmon Standard V 1.4 Audit Manual

##### **REFERENCES**

1. QA 26  
<https://www.asc-aqua.org/what-you-can-do/get-certified/variance-request-interpretation-platform/QA0026/>

### Essential Component C.4.08

*The standard requires that appropriate records are kept on all feed use. At a minimum this must include: feed source, feed Batch/Lot/ID number, date of purchase, and feed conversion ratio (FCR) MT*

#### ■ GLOBAL G.A.P. comment

Evidence provided does not contain "At a minimum this must include: feed source, feed Batch/Lot/ID number, date of purchase, and feed conversion ratio (FCR) MT" as per the component text.

What are the ASC-Acknowledged certification schemes as per ASC salmon manual 4.1.1.c?

ASC salmon manual 4.1.1.e, evidence provided does not stipulate what the declaration from feed supplier should contain, as per GSSI requirement: "At a minimum this must include: feed source, feed Batch/Lot/ID number, date of purchase, and feed conversion ratio (FCR) MT".

#### ■ GSSI response

Following the comment by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C4.08.

- *What are the ASC-Acknowledged certification schemes as per ASC salmon manual 4.1.1.c?*

ASC keeps a running list that is publicly available on the website: <https://asc-aqua.org/producers/farm-standards/variance-request-and-interpretation/QA0419/>

- *ASC salmon manual 4.1.1.e, evidence provided does not stipulate what the declaration from feed supplier should contain, as per GSSI requirement: "At a minimum this must include: feed source, feed Batch/Lot/ID number, date of purchase, and feed conversion ratio (FCR) MT".*

Sufficient evidence is found in [Footnote 50](#), stating that "Traceability shall be at a level of detail that permits the feed producer to demonstrate compliance with the standards in this document (i.e., marine raw ingredients must be traced back to the fishery). The requirement of this footnote works together with 4.1.1 a. of the Audit Manual which states that the farm shall "maintain detailed records of all feed suppliers and purchases including contact information and purchase and delivery records". The traceability element of the requirement in combination with the requirement of record keeping from the Audit Manual (purchase and delivery records), satisfy the GSSI requirement. On the other hand, FCR is covered by the requirements in Criterion 4.2 of the ASC Salmon Standard (Use of wild fish for feed).

#### **Conclusion on GSSI Essential Component C.4.08**

**Conclusion:**

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

- 1) Traceability of feed ingredients more than 1% of feed
  
- 2) All farms to maintain detailed records of all feed suppliers and purchases including contact information and purchase and delivery records

#### **REFERENCES**

1. ASC Salmon Standard V 1.3, Indicator 4.1.1  
[https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard\\_v1.3\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/12/ASC-Salmon-Standard_v1.3_Final.pdf)
  
2. Audit Manual ASC Salmon Standard V 1.3, Indicator 4.1.1  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual\\_v1.3.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual_v1.3.pdf)

■ **Section C – Aquaculture (Shrimp Standard)**

**Essential Component C.1.01**

*The standard requires that the decision to treat with antimicrobial agents, and their subsequent application, is consistent with the Principles for Responsible & Prudent Use of Antimicrobial Agents in Aquatic Animals and other guidance of the OIE Aquatic Animal Health Code i.e., by the aquatic animal health professional or other relevant competent authority and in response to a diagnosed disease; see Articles 6.2.7 and 6.2.8 of the 2015 Aquatic Animal Health Code).*

■ **GLOBAL G.A.P. comment**

5.3.1.c mentions that antibiotics or medicated feed is allowed to be used. How is the usage of antibiotics and medicated feed covered as per: "The standard is expected to prohibit prophylactic usage for growth promotion and require that all antimicrobials are used in response to a diagnosed disease"

Evidence provided does not prohibit prophylactic usage for growth promotion.

Is this GSSI reference relevant for the complete production chain? If so, how is the verification of responsible antibiotic use performed at suppliers to grow-out farms, such as hatcheries and subcontractors, for aquatic species entering the ASC supply chain?

■ **GSSI response**

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C1.01.

- *5.3.1.c mentions that antibiotics or medicated feed is allowed to be used. How is the usage of antibiotics and medicated feed covered as per: "The standard is expected to prohibit prophylactic usage for growth promotion and require that all antimicrobials are used in response to a diagnosed disease"*

*Evidence provided does not prohibit prophylactic usage for growth promotion.*

ASC is considered to be in alignment with Component C1.01, as Indicator 5.3.1 b. of the Audit Manual refers to safe usage of antibiotics and medicated feed, stating that farms shall provide records detailing the use of any veterinary medicine. Furthermore, the rationale section of Criterion 5.3 states that "In the event that veterinary medicines and chemicals are used, they must be based on a diagnostic test, and all labelled instructions must be precisely followed. The specialist shall also indicate how to apply, handle and store veterinary medicines and chemicals". This requirement in the rationale ensures veterinary medicines and chemicals are not used prophylactically. This evidence confirms ASC's alignment with component C1.01.

- *Is this GSSI reference relevant for the complete production chain? If so, how is the verification of responsible antibiotic use performed at suppliers to grow-out farms, such as hatcheries and subcontractors, for aquatic species entering the ASC supply chain?*

As with all current species-specific standards, the scope of the ASC Shrimp Standard is for grow-out farms. The instruction to Client on Indicator 5.3.1 refers to the prohibition of shrimp treated with antibiotics to carry the ASC label. Since the scope of the standard is grow-out, that prohibition is not applicable/relevant to hatcheries as these facilities are not in the scope of the standard.

### **Conclusion on GSSI Essential Component C.1.01**

#### **Conclusion:**

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

- 1) prohibits use of antibiotics and medicated feed on ASC -labelled products
- 2) prohibits the allowance of antibiotics categorised as critically important by the World Health Organisation, even if permitted by national authorities

#### **REFERENCES**

1. ASC Shrimp Standard V 1.1 indicator 5.3.1 and 5.3.2:  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)
2. Audit Manual ASC Shrimp Standard V 1.1 indicator 5.3.1 and 5.3.2:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)

### **Supplementary Component C.1.01.02**

*The standard prohibits aquatic animals treated with antimicrobials from being labeled with its standard; however, antimicrobial application deemed necessary by an aquatic health professional cannot be withheld from aquatic animals solely to preserve the certification status of the production.*

#### ■ **GLOBAL G.A.P. comment**

The evidence provided does not cover how the standard is making sure that animals are not unnecessary suffering, as per component text "antimicrobial application deemed necessary by an aquatic health professional cannot be withheld from aquatic animals solely to preserve the certification status of the production." and guidance text "The standard is expected to ensure the need to treat aquatic animals is prioritized above the certification status."

#### ■ **GSSI response**

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C1.01.02.

Indicator C.1.01.02 does not specifically mention the issue of animal welfare or suffering – it simply states if antimicrobial application in response to a disease is 'deemed necessary' and the referenced Indicators cover this point.

### **Conclusion on GSSI Supplementary Component C.1.01.02**

#### **Conclusion:**

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

- 1) prohibits use of antibiotics and medicated feed on ASC -labelled products

2) prohibits the allowance of antibiotics categorised as critically important by the World Health Organisation, even if permitted by national authorities

## REFERENCES

1. ASC Shrimp Standard V 1.1 indicator 5.3.1 and 5.3.2:  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)
2. Audit Manual ASC Shrimp Standard V 1.1 indicator 5.3.1 and 5.3.2:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)

### Essential Component C.1.02

*The standard requires that workers with responsibilities in aquatic animal husbandry have been adequately trained and are aware of their responsibilities in aquatic animal health management practices.*

#### ■ GLOBAL G.A.P. comment

Evidence does not stipulate adequate training of workers with responsibilities in aquatic animal husbandry and are aware of their responsibilities in aquatic animal health management practices, as per component text: "Evidence only covers training of workers regarding proper use of chemical products."

Is this GSSI component applicable only to the scope of the standard or should it also be able to cover activities performed by subcontractors and other stakeholders in the supply chain, such as hatcheries and nurseries?

#### ■ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C1.02.

With regards to the comment regarding the evidence of adequate training of workers, the Shrimp Audit Manual Indicators 5.3.2. and 5.3.4. within their Compliance Criteria and Auditor Evaluations cover both farmers working knowledge on banned antibiotics and SOPs for chemical products for farm workers respectively. Both these indicators are referenced.

The above observation related to subcontractors and other stakeholders, does not relate to ASC's suitability for alignment – they appear to relate to the GSSI's Global Benchmark Tool Framework as a whole, which is not the subject of the ASC Public Consultation

### **Conclusion on GSSI Essential Component C.1.02**

#### **Conclusion:**

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

- 1) no allowance for the use of antibiotics categorised as critically important by the World Health Organisation (WHO), even if authorised by pertinent national authorities.
- 2) Evidence of worker awareness/training and instruction records are available on the proper use of chemical products by farm workers.

#### **REFERENCES**

1. ASC Shrimp audit manual V 1.1 Indicator 5.3.2and 5.3.4:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)
2. ASC Shrimp Standard V 1.1 Indicator 5.3.2and 5.3.4::  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)

#### Essential Component C.1.04

*The standard requires the aquaculture facility to establish, implement and maintain appropriate procedures to respond to disease outbreaks, which includes the ability to quarantine the aquatic animal where feasible.*

#### ■ GLOBAL G.A.P. comment

Link to variance request is not working.

None of the evidence provided contain any information regarding "responding to disease outbreaks, which includes the ability to quarantine the aquatic animal where feasible."

Evidence provided regarding no allowance of antibiotics and no allowance for discharge of any hazardous chemicals are not supportive to this criteria

#### ■ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C1.04, however a link in the reference list has been updated.

Sufficient evidence has been provided relating to the 'responding to disease outbreaks'. Indicator 5.1.1. 'Develop and maintain an operational health plan' which includes specific points relating to detection and prevention of disease transmission. Other Indicators under Criterion 5.3., i.e. 5.3.1. and 5.3.2. were also referenced, as they specifically refer to disease management and treatment.

Please note the link has been updated by ASC. See correct link here: <https://asc-aqua.org/producers/farm-standards/variance-request-and-interpretation/QA0026/> and the indicators mentioned above are included.

#### **Conclusion on GSSI Essential Component C.1.04**

##### **Conclusion:**

The ASC Shrimp Standard is in alignment because the standard has a indicators that require:

- 1)The development and maintenance of an operational health plan addressing:
  - A) Pathogens that can come from the surrounding environment into the farm (e.g., predator and vector control)
  - B) Pathogens that can spread from the farm to the surrounding environment (e.g., effluent filtration/sterilization, and waste such as dead-shrimp management)
  - C) Spreading of pathogens within the farm. Critical to avoid cross contamination, detect and prevent emerging pathogen(s), and monitor external signs of pathologies and moribund animals.
- 2) no allowance for use of antibiotics and medicated feed on ASC-labeled products
- 3) no allowance for the use of antibiotics categorised as critically important by the World Health Organisation (WHO), even if authorised by pertinent national authorities.
- 4) no allowance for discharge of any hazardous chemicals without previous neutralisation

The Instruction to Auditors (Guidance for Implementation) states that 'The auditor needs to be assured that the farm is not contaminating or spreading disease to the surrounding environment, has enacted good prevention measures adapted to the localized risks and has mechanisms to prevent the spread of infections from one pond to another.' The ASC Variance Request and Interpretation Platform includes the statement 'The health management plan... includes an appropriate procedure to prevent and respond to disease outbreaks, which



includes informing veterinarian, inform neighbouring producers, aquaculture authorities, the Certification Body and the ability to quarantine the aquatic animal where feasible or even shut down the operation if it is needed.'

#### **REFERENCES**

1. ASC Shrimp Standard V 1.1 indicator 5.1.1, 5.1.4, 5.3.1, 5.3.2, 5.3.6:  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)
2. Audit Manual ASC Shrimp Standard V 1.1 indicator 5.1.1, 5.1.4, 5.3.1, 5.3.2, 5.3.6:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)
3. QA 84  
<https://asc-aqua.org/producers/farm-standards/variance-request-and-interpretation/QA0026/>

### Essential Component C.1.05

*The standard requires the aquaculture facility to establish, implement and maintain appropriate procedures and/or systems for the early detection of aquatic animal health issues, which include routine monitoring of stocks and the environment.*

#### ■ GLOBAL G.A.P. comment

Health risks are not solely caused by pathogens, how is ASC assuring that conditions of the holding facilities are in line with the needs of the aquatic species, as per guidance text: "Environmental monitoring is expected to include detection of unfavorable environmental quality factors that could adversely affect the health of the aquatic animal (e.g., water temperature and quality)."?

Evidence does not mention "implements and maintains appropriate procedures and/or systems for the early detection of aquatic animal health issues, which include routine monitoring of stocks and the environment" as per guidance text

#### ■ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C1.05.

This component is about early detection of aquatic animal health issues and this is referenced in Indicator 5.1.1. Indicator 5.1.1. requires an operational health plan; a health plan is described in the Rational of PRINCIPLE 5: MANAGE SHRIMP HEALTH AND WELFARE IN A RESPONSIBLE MANNER as one that 'ensures the adequate identification of potential disease risks, appropriate screening and disease prevention measures, effective adaptive measures and pathways to continuous improvement.' This is sufficient evidence to demonstrate that the ASC Shrimp Standard has adequate procedures in place for early detection of health issues.

#### **Conclusion on GSSI Essential Component C.1.05**

##### **Conclusion:**

The ASC Shrimp Standard is in alignment because the standard has an indicator that requires:

1) The development and maintenance of an operational health plan addressing:

- A) Pathogens that can come from the surrounding environment into the farm (e.g., predator and vector control)
- B) Pathogens that can spread from the farm to the surrounding environment (e.g., effluent filtration/sterilization, and waste such as dead-shrimp management)
- C) Spreading of pathogens within the farm. Critical to avoid cross contamination, detect and prevent emerging pathogen(s), and monitor external signs of pathologies and moribund animals.

## REFERENCES

1. ASC Shrimp audit manual V 1.1 indicator 5.1.1:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)
2. ASC Shrimp Standard V 1.1 indicator 5.1.1:  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)

### Essential Component C.1.07

*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):*

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

#### ■ GLOBAL G.A.P. comment

Evidence provided does not include the elements as per guidance text

"3. Introductions and transfers of farmed animals (where relevant, which is overseen by an aquatic animal health professional"

Is evidence provided regarding an "effective biosecurity" sufficient as per

"The farm will need to develop and maintain an operational health plan addressing: A) Pathogens that can come from the surrounding environment into the farm (e.g., predator and vector control) B) Pathogens that can spread from the farm to the surrounding environment (e.g., effluent filtration/sterilization, and waste such as dead-shrimp management) C) Spreading of pathogens within the farm. Critical to avoid cross contamination, detect and prevent emerging pathogen(s), and monitor external signs of pathologies and moribund animals)."

#### ■ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C1.07.

The referenced Indicator 5.1.1. requires an operational health plan; a health plan is described in the Rationale of PRINCIPLE 5: MANAGE SHRIMP HEALTH AND WELFARE IN A RESPONSIBLE MANNER as one that 'ensures the adequate identification of potential disease risks, appropriate screening and disease prevention measures, effective adaptive measures and pathways to continuous improvement. It also refers to the fact that the plan shall address pathogens that can come into the farm and provides an example of what those might be. The examples are not exhaustive. The main focus of 1) is on pathogens that can come into the farm. In the same way, 2) focus on pathogens that the farm can spread and 3) on pathogens within the farm. Furthermore, the rationale section in Criterion 5.1 states "At the farm level, biosecurity measures include controlling the inputs" and mentions PLs as an example of input.' This is sufficient evidence to demonstrate that the ASC Shrimp Standard adequately addresses the issue of operational management practices covering biosecurity, vaccines (no commercial vaccines currently available for shrimp) and introduction and transmission of farmed animals.

#### **Conclusion on GSSI Essential Component C.1.07**

##### **Conclusion:**

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

- 1) The farm will need to develop and maintain an operational health plan addressing: A) Pathogens that can come from the surrounding environment into the farm (e.g., predator and vector control) B) Pathogens that can spread from the farm to the surrounding environment (e.g., effluent filtration/sterilization, and waste such as dead-shrimp management) C) Spreading of pathogens within the farm. Critical to avoid cross contamination, detect and prevent emerging pathogen(s), and monitor external signs of pathologies and moribund animals).
- 2) 100% of stocked post larvae (PLs) that are Specific Pathogen Free (SPF) or Specific Pathogen Resistant

(SPR) for all important pathogens.

3) PL and broodstock have appropriate disease-free status and sources meet regional, national and international importation guidelines (e.g., OIE and ICES).

4) 100% of total post larvae from closed loop hatchery

5) Origin of wild-caught broodstock sourced from locally fished broodstock only.

## REFERENCES

1. ASC Shrimp audit manual V 1.1 indicator 5.1.1, 5.1.4, 6.2.1, 6.2.2 and 6.2.3  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)
2. ASC Shrimp Standard V 1.1 indicator 5.1.1, 5.1.4, 6.2.1, 6.2.2 and 6.2.3  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)

### Supplementary Component C.1.07.06

*The standard requires suitable performance-based metric limits on survival rate (or similar system that incorporates survival rates (e.g. recovery rate)) or similar criteria that demonstrate that the aquatic health management practices are effective.*

- **GLOBAL G.A.P. comment**

The link to the variance request is not working.

- **GSSI response**

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C1.07.06, however a link was updated in the reference list.

As seen earlier in the document, please see the updated link here: [Variance request and Interpretation - ASC International \(asc-aqua.org\)](https://www.asc-aqua.org)

### Essential Component C.1.10

*The standard requires the aquaculture facility to maintain records on veterinary drug and chemical usage and the rationale for their use.*

#### ■ GLOBAL G.A.P. comment

Evidence does not mention "method of administration and withdrawal times of chemicals and veterinary drugs and the rationale"

Records needs to be kept of chemical usage, however it is not clear whether this covers the guidance text "method of administration and withdrawal times of chemicals and veterinary drugs and the rationale for their use".

#### ■ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C1.10, however supplementary evidence has been added to ensure alignment.

The "method of administration and withdrawal times of chemicals and veterinary drugs and the rationale for their use" is covered in the ASC Shrimp Standard under Criterion 5.3. Disease Management and Treatment' – Use of antibiotics; i.e.

- Withdrawal time is specified for veterinary medicines and chemicals, i.e. All veterinary medicines and chemicals must 'Respect the withdrawal period or apply a period of 750 degree-days for those without documented withdrawal period times;'
- Method of administration and Rationale for use – i.e. 'In the event that veterinary medicines and chemicals are used, they must be based on a diagnostic test, and all labeled instructions must be precisely followed. The specialist shall also indicate how to apply, handle and store veterinary medicines and chemicals.'

Therefore the following evidence in the form of Criterion 5.3 has now been referenced in order to permit alignment.

- [ASC Shrimp audit manual V 1.1 Criterion 5.3 Rationale 'Use of Antibiotics':  
https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)

#### **Conclusion on GSSI Essential Component C.1.10**

##### **Conclusion:**

The ASC Shrimp Standard is in alignment because the standard includes indicators that:  
1) require records of stocks and usage for all chemical stocks, their usage and storage.

##### **REFERENCES**

1. ASC Shrimp audit manual V 1.1 indicator 5.3.3:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)
2. ASC Shrimp Standard V 1.1 indicator 5.3.3:  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)

3. ASC Shrimp audit manual V 1.1 Criterion 5.3 Rationale 'Use of Antibiotics': [https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)



### Essential Component C.2.01

*The standard requires the establishment, implementation and maintenance of an appropriate system for the application of chemicals and veterinary drugs.*

#### ■ GLOBAL G.A.P. comment

Evidence provided does not mention: "The system is expected to ensure that the application of the product follows the instructions of the manufacturer or other competent authority." as per the guidance text.

#### ■ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C2.01, however supplementary evidence has been added to ensure alignment.

It has been noted there is insufficient evidence for "method of administration and withdrawal times of chemicals and veterinary drugs and the rationale for their use" although this is covered in the ASC Shrimp Standard under Criterion 5.3. Disease Management and Treatment' – Use of antibiotics;

- Method of administration and Rationale for use – i.e. 'In the event that veterinary medicines and chemicals are used, they must be based on a diagnostic test, and all labeled instructions must be precisely followed. The specialist shall also indicate how to apply, handle and store veterinary medicines and chemicals.'

Therefore the following evidence in the form of Criterion 5.3 has now been referenced in order to permit alignment.

- [ASC Shrimp audit manual V 1.1 Criterion 5.3 Rationale 'Use of Antibiotics':  
https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)

#### **Conclusion on GSSI Essential Component C.2.01**

##### **Conclusion:**

The ASC Shrimp Standard is in alignment because the standard includes indicators that: 1) require information on chemical usage and storage. 2) Proper use of chemical products by farm workers 3) No allowance for discharge of any hazardous chemicals without previous neutralization.

##### **REFERENCES**

1. ASC Shrimp audit manual V 1.1 indicator 5.3.3, 5.3.4 and 5.3.6  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)
2. ASC Shrimp Standard V 1.1 indicator 5.3.3, 5.4.6 and 5.3.6  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)
1. **ASC Shrimp audit manual V 1.1 Criterion 5.3 Rationale 'Use of Antibiotics':**  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)

## Essential Component C.2.02

*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*

### ■ GLOBAL G.A.P. comment

Evidence provided does not mention: "The system is expected to ensure that the application of the product follows the instructions of the manufacturer or other competent authority." as per the guidance text.

### ■ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C2.02, however supplementary evidence has been added to ensure alignment.

Please see previous comments (C.2.01 and C.1.10) re. chemical and veterinary drug usage, i.e. method of administration, 'all labeled instructions must be precisely followed.' The addition of Criterion 5.3 Rationale 'Use of Antibiotics' provides sufficient evidence to ensure alignment with Component C2.02.

### Conclusion on GSSI Essential Component C.2.02

#### Conclusion:

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

- 1) records of stocks and usage for all chemical products are available
- 2) prohibit the treatment of water treated with pesticides that are banned or restricted
- 3) prohibit the discharge of any hazardous chemicals without previous neutralisation
- 4) workers are properly trained on chemical usage
- 5) Information on chemical storage and usage

#### REFERENCES

1. ASC Shrimp audit manual V 1.1 indicator 5.3.3, 5.3.4, 5.3.5 and 5.3.6:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)
2. ASC Shrimp Standard V 1.1 indicator 5.3.3, 5.3.4, 5.3.5 and 5.3.6:  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)
3. **ASC Shrimp audit manual V 1.1 Criterion 5.3 Rationale 'Use of Antibiotics':** [https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)

### Essential Component C.3.01

*MT The standard requires that the aquaculture facility and its daily operations ensure that good culture and hygienic conditions are maintained. Relevant aspects include proper management of all chemicals, fuels and feeds including their safe storage*

#### ■ GLOBAL G.A.P. comment

Evidence provided does not mention storage of feed and fuel, as well as pest control, as per guidance text:

- Appropriate storage of chemicals and fuel (e.g., stored in a lockable, labeled facility, limited access by personnel, leakage prevention - all based on Safety Data Sheets (SDS) (see figure 4.14 of the A Guide to The Globally Harmonized System of Classification and Labeling of Chemicals (GHS), available at: [www.osha.gov/dsg/hazcom/ghsguideoct05.pdf](http://www.osha.gov/dsg/hazcom/ghsguideoct05.pdf))
- Appropriate storage of feed (e.g., stored separately from sources of contamination, accurately labeled, keeping medicated and nonmedicated feed separated.)
- Appropriate pest control (e.g., prevent contamination of feed, chemicals by rodents or insects etc.)

#### ■ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C3.01.

Evidence has been provided to cover appropriate storage of chemicals and fuel, i.e. ASC Shrimp Standard and Audit Manual Indicators 5.3.3., 5.3.4., 7.7.1 and 7.7.2. – which have been referenced.

**IE requested a response from ASC.**

**Response from ASC:**

The standard does not explicitly refer to requirements specific to feed storage and pest control but, with the same intent as the requirements around proper management of chemicals and fuels (e.g. 7.7.1 and 7.7.2), requirement 5.1.1 requires farms to develop and maintain an operational health plan (OHP) addressing pathogen transmission to, within and from the farm. Predator and vector control are mentioned as examples of elements to consider when operationalising the OHP.

**Sophie, please review the response above from ASC and submit your final response.**

Yes – I agree that Indicator 5.1.1. sufficiently covers the issue of pest control 5.1.1.3) within the Operational Health Plan. Although there is no specific mention of appropriate feed storage although it may be argued that this is included within the farm's Operational Health Plan.

#### **Conclusion on GSSI Essential Component C.3.01**

##### **Conclusion:**

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

- 1) require information on chemical usage and storage

- 2) workers are properly trained on chemical usage
- 3) safe storage and handling of chemicals and hazardous materials is implemented
- 4) responsible handling and disposal of wastes are in place

#### **REFERENCES**

1. ASC Shrimp audit manual V 1.1 indicator 5.3.3, 5.3.4, 7.7.1 and 7.7.2:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)
2. ASC Shrimp Standard V 1.1 indicator 5.3.3, 5.3.4, 7.7.1 and 7.7.2:  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)

### Essential Component C.4.01

*The standard requires the aquaculture facility to sources feed from a manufacturer that can trace aquatic feed ingredients including fish meal and fish oil (>1% inclusion) to the species and, at least, to the country of origin.*

- **GLOBAL G.A.P. comment**

Evidence mentions principle 7.1.2, which refers to "3rd party evidence" and refers to the website of ASC "a list of suitable schemes is available on the ASC website", what is the link to the website?

- **GSSI response**

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C4.01.

The link to the website is as follows: <https://asc-aqua.org/producers/farm-standards/variance-request-and-interpretation/QA0419/>

#### **Conclusion on GSSI Essential Component C.4.01**

##### **Conclusion:**

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

- 1) require basic traceability of feed ingredients including source, species, country of origin and harvest method demonstrated by the feed producer
- 2) require demonstration of chain of custody and traceability for fisheries products in feed through an International Social and Environmental Accreditation and Labelling (ISEAL) member or ISO/IEC 17065:2012 compliant certification scheme that also incorporates the FAO Code of Conduct for Responsible Fisheries

##### **REFERENCES**

1. ASC Shrimp audit manual V 1.1 indicator 7.1.1 and 7.1.2:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)
2. ASC Shrimp Standard V 1.1 indicator 7.1.1 and 7.1.2:  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)
3. **QA 85**  
<https://asc-aqua.org/producers/farm-standards/variance-request-and-interpretation/QA0026/>

### Essential Component C.4.03

*The standard requires the aquaculture facility to source feed from a manufacturer that prohibits the use of fishmeal and fish oil from illegal, unreported, and unregulated fishing (I.U.U.).*

- **GLOBAL G.A.P. comment**

Link to variance request is not working.

- **GSSI response**

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C4.03, however, the link in the reference list has been updated.

ASC has reported a recent update to their website, which has caused this error. Please see revised link here:  
<https://www.asc-aqua.org/what-you-can-do/get-certified/variance-request-interpretation-platform/QA0026/>

#### **Conclusion on GSSI Essential Component C.4.03**

##### **Conclusion:**

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

- 1) requires the farm to use fish meal and fish oil from fisheries certified to a full ISEAL member that has guidelines specifically promoting ecological sustainability of forage fisheries or
- 2) requires the farm to use at least 80% of fish meal and fish oil derived from fisheries recognised by FishSource with a score of 8 or 6 with interim requirements or
- 3) requires a farm to use fish meal and fish oil from a Fishery Improvement Program with periodic public reporting

ASC has also stated in QA 85 that farms must be free from fish meal and fish oil derived from IUU fishing practices with demonstrated compliance requirements

##### **REFERENCES**

1. ASC Shrimp audit manual V 1.1 indicator 7.2.1a, b c:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)
2. ASC Shrimp Standard V 1.1 indicator 7.2.1a, b c:  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)
3. QA 85  
<https://asc-aqua.org/producers/farm-standards/variance-request-and-interpretation/QA0026/>



#### Essential Component C.4.04

*The standard requires that the aquaculture facility to source 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.*

#### ■ GLOBAL G.A.P. comment

Evidence provided does not mention: "a written policy which includes assessment of source fishery status and identification of improvement needs and work plan to deliver improvements."

#### ■ GSSI response

Following the comments by Global G.A.P., no changes have been made to Component C.4.04.

The rationale section of Criterion 7.1 (Traceability of raw materials in feed) states that: "All fishery components of a feed must be chain-of-custody certified by an ISEAL accredited or International Standard Organization (ISO)114 65-compliant certification scheme that also incorporates the FAO Code of Conduct for Responsible Fisheries".

#### **Conclusion on GSSI Essential Component C.4.04**

##### **Conclusion:**

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

- 1) 100% (mass balance) fishmeal and fish oil used in feed to come from fisheries certified by a full ISEAL member that has guidelines specifically promoting ecological sustainability of forage fisheries.  
or
- 2) FishSource score for the fishery(ies) from which a minimum of 80% of the fishmeal and fish oil by volume is derived a. for Fishsource Criteria 4 (spawning biomass assessment). Requirement: 8  
b. for Fishsource Criteria 1, 2, 3 and 5. Requirement: 6  
or
- 3) Lacking a FishSource assessment a fishery could be engaged in an Improvers Program. (transparent and public Fisheries Improvement Project (FIP) with periodic public reporting

##### **REFERENCES**

1. ASC Shrimp audit manual V 1.1 indicator 7.2.1a, b c:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)
2. ASC Shrimp Standard V 1.1 indicator 7.2.1a, b c:  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)



### Supplementary Component C.4.04.02

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

#### ■ GLOBAL G.A.P. comment

Evidence provided does not mention "Verification is expected to include a 3rd party certification or audit of the feed manufacturer" or is FishSource qualify as a 3rd party certification?

#### ■ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C4.04.02.

The ASC is in alignment, as the rationale section of Criterion 7.1 (Traceability of raw materials in feed) states that: "All fishery components of a feed must be chain-of-custody certified by an ISEAL accredited or International Standard Organization (ISO)114 65-compliant certification scheme that also incorporates the FAO Code of Conduct for Responsible Fisheries".

#### **Conclusion on GSSI Supplementary Component C.4.04.02**

##### **Conclusion:**

The ASC Shrimp Standard is in alignment because it includes sourcing of fishmeal and fish oil from whole fish from fisheries certified according to standards consistent with FAO ecolabelling guidelines if the whole fish is rejected for use of human consumption.

1) 100% (mass balance) fishmeal and fish oil used in feed to come from fisheries certified by a full ISEAL member that has guidelines specifically promoting ecological sustainability of forage fisheries.

or

2) FishSource score for the fishery(ies) from which a minimum of 80% of the fishmeal and fish oil by volume is derived a. for Fishsource Criteria 4 (spawning biomass assessment). Requirement: 8

b. for Fishsource Criteria 1, 2, 3 and 5. Requirement: 6

or

3) Lacking a FishSource assessment a fishery could be engaged in an Improvers Program. (transparent and public Fisheries Improvement Project (FIP) with periodic public reporting

##### **REFERENCES**

1. ASC Shrimp audit manual V 1.1 indicator 7.2.1a, b c:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)
2. ASC Shrimp Standard V 1.1 indicator 7.2.1a, b c:  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)

### Supplementary Component C.4.04.05

*The standard requires that the aquaculture facility sources feed from a manufacturer that assures the fish meal and fish oil used in their production based upon 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. The standard is expected to apply to other relevant marine feed ingredients, such as those from squid and krill.*

#### ■ GLOBAL G.A.P. comment

What evidence is available that Fishsource conducts 3rd party certification or their assessment is based on 3rd party certification? If, Fishsource does not conduct 3rd party certification, how is ASC in alignment with the GSSI criteria, knowing that either 7.2.1 a,b or c needs to be complied with?

#### ■ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C4.04.05.

The ASC is in alignment with Component C4.04.05, as the rationale section of Criterion 7.1 (Traceability of raw materials in feed) states that: "All fishery components of a feed must be chain-of-custody certified by an ISEAL accredited or International Standard Organization (ISO)114 65-compliant certification scheme that also incorporates the FAO Code of Conduct for Responsible Fisheries".

#### **Conclusion on GSSI Supplementary Component C.4.04.05**

##### **Conclusion:**

The ASC Shrimp Standard is in alignment because it includes sourcing of fishmeal and fish oil from whole fish from fisheries certified according to standards consistent with FAO ecolabelling guidelines if the whole fish is rejected for use of human consumption.

1) 100% (mass balance) fishmeal and fish oil used in feed to come from fisheries certified by a full ISEAL member that has guidelines specifically promoting ecological sustainability of forage fisheries.

or

2) FishSource score for the fishery(ies) from which a minimum of 80% of the fishmeal and fish oil by volume is derived a. for Fishsource Criteria 4 (spawning biomass assessment). Requirement: 8

b. for Fishsource Criteria 1, 2, 3 and 5. Requirement: 6

or

3) Lacking a FishSource assessment a fishery could be engaged in an Improvers Program. (transparent and public Fisheries Improvement Project (FIP) with periodic public reporting

##### **REFERENCES**

1. ASC Shrimp audit manual V 1.1 indicator 7.2.1a:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)
2. ASC Shrimp Standard V 1.1 indicator 7.2.1a:  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)

### Supplementary Component C.4.04.06

*The standard requires that the aquaculture facility sources feed from a manufacturer that assures that the fishmeal and fish oil derived from byproducts (if greater than 1% inclusion) come originally from fishery and aquaculture sources that were certified to a standard benchmarked to be, at minimum, consistent with relevant FAO's ecolabelling guidelines.*

- **GLOBAL G.A.P. comment**

What evidence is available that Fishsource conducts 3rd party certification or their assessment is based on 3rd party certification? If, Fishsource does not conduct 3rd party certification, how is ASC in alignment with the GSSI criteria, knowing that either 7.2.1 a,b or c needs to be complied with?

- **GSSI response**

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C4.04.06.

ASC is in alignment with C.4.04.06, as the rationale section of Criterion 7.1 (Traceability of raw materials in feed) states that: "All fishery components of a feed must be chain-of-custody certified by an ISEAL accredited or International Standard Organization (ISO)114 65-compliant certification scheme that also incorporates the FAO Code of Conduct for Responsible Fisheries".

#### **Conclusion on GSSI Supplementary Component C.4.04.06**

##### **Conclusion:**

The ASC Shrimp Standard is in alignment because it includes sourcing of fishmeal and fish oil from whole fish from fisheries certified according to standards consistent with FAO ecolabelling guidelines if the whole fish is rejected for use of human consumption.

1) 100% (mass balance) fishmeal and fish oil used in feed to come from fisheries certified by a full ISEAL member that has guidelines specifically promoting ecological sustainability of forage fisheries.

or

2) FishSource score for the fishery(ies) from which a minimum of 80% of the fishmeal and fish oil by volume is derived a. for Fishsource Criteria 4 (spawning biomass assessment). Requirement: 8

b. for Fishsource Criteria 1, 2, 3 and 5. Requirement: 6

or

3) Lacking a FishSource assessment a fishery could be engaged in an Improvers Program. (transparent and public Fisheries Improvement Project (FIP) with periodic public reporting

#### **REFERENCES**

1. ASC Shrimp audit manual V 1.1 indicator 7.2.1a:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)
2. ASC Shrimp Standard V 1.1 indicator 7.2.1a:  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)

#### Essential Component C.4.06

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

- **GLOBAL G.A.P. comment**

Link to variance request is not working.

- **GSSI response**

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C4.06, however, the link in the reference list has been updated.

ASC has reported a recent update to their website, which has caused this error. Please see revised link here:  
<https://www.asc-aqua.org/what-you-can-do/get-certified/variance-request-interpretation-platform/QA0026/>

#### Essential Component C.4.07

*Where applicable, the standard requires that the aquaculture facility has suitable measures in place to ensure that feed is used efficiently at the individual production unit level.*

- **GLOBAL G.A.P. comment**

Evidence does not mention FCR.

- **GSSI response**

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C4.07, however, additional evidence has been reference to ensure alignment.

It is agreed that there is missing evidence, the **indicator 7.4.2** has been added, as it requires records of eFCR, which for the purpose of the standard equals to FCR.

### **Conclusion on GSSI Essential Component C.4.07**

#### **Conclusion :**

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

1) requires the farm to have an Forage Fish Equivalency ratio of 1.35:1 for L. Vannamei and 1.9:1 for P. Monodon

#### **REFERENCES**

1. ASC Shrimp audit manual V 1.1 indicator 7.4.1, **7.4.2**:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)
2. ASC Shrimp Standard V 1.1 indicator 7.4.1, **7.4.2**:  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)

### **Essential Component C.4.08**

*The standard requires that appropriate records are kept on all feed use. At a minimum this must include: feed source, feed Batch/Lot/ID number, date of purchase, and feed conversion ratio (FCR) MT*

#### **GLOBAL G.A.P. comment**

The component text requires "At a minimum this must include: feed source, feed Batch/Lot/ID number, date of purchase, and feed conversion ratio (FCR) MT". The provided evidence does not include all the above mentioned items.

#### **GSSI response**

Following the comments made by Global G.A.P., no changes were made to the conclusion or references of Component C.4.08. Feed conversion ratio is required by 7.4.2. With regards to the other minimum elements required by the component, requirement 7.1.2 requires demonstration of chain of custody and traceability for fisheries products in feed through an ISEAL member or ISO 65 compliant certification scheme that also incorporates the FAO113 Code of Conduct for Responsible Fisheries. The operationalisation of this requirement addresses these minimum elements of the component.

### **Conclusion on GSSI Essential Component C.4.08**

#### **Conclusion :**

The ASC Shrimp Standard is in alignment because the standard includes an indicator that require

- 1) 100% (mass balance) fishmeal and fish oil used in feed to come from fisheries certified by a full ISEAL member that has guidelines specifically promoting ecological sustainability of forage fisheries.

or

- 2) FishSource score for the fishery(ies) from which a minimum of 80% of the fishmeal and fish oil by volume is derived a. For Fishsource Criteria 4 (spawning biomass assessment). Requirement: 8  
b. For Fishsource Criteria 1, 2, 3 and 5. Requirement: 6

or

- 3) Lacking a FishSource assessment a fishery could be engaged in an Improvers Program. (transparent and public Fisheries Improvement Project (FIP) with periodic public reporting

- 4) Economic feed conversion ratio (eFCR) records available. This includes of statement(s) from feed manufacturer indicating the average percentage of fish meal and fish oil in each type of feed used. For first audits, farm records must cover  $\geq 6$  months.

## REFERENCES

1. ASC Shrimp audit manual V 1.1 indicator 7.2.1 and 7.4.2:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)
2. ASC Shrimp Standard V 1.1 indicator 7.2.1 and 7.4.2:  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)

### Supplementary Component C.5.02.02

*The standard excludes aquaculture facilities where a history of repeated accidental or deliberate mortality of endangered species has occurred.*

#### ■ GLOBAL G.A.P. comment

Evidence does not match the criteria: “accidental” versus “intentional” lethal predator control. How is accidental mortality prevented?

#### ■ GSSI response

Following comments by Global G.A.P., no changes have been made to Component C5.02.02 to ensure continued alignment.

Requirement 2.1.1 requires farmers to commission a participatory Biodiversity Environmental Impact Assessment (B-EIA) and that the process and document must follow the guidance provided in Appendix I.

Footnote 26 states that the B-EIA must identify critical habitats for all species at risk on the proposed site and design constructions such as protecting these areas. The first requirement is that farmers are aware of the different species on their farms. The footnote also states that the B-EIA will allow the farmer to demonstrate compliance". Specifically, requirement 2.3.1 does not allow farms to be sited in critical habitats of endangered species. To complement this requirement, 2.3.2 requires farms to maintain habitat critical for endangered species by implementing the protection measures of habitat identified by the B-EIA process. In summary, the system of requirements around critical habitat and endangered species of the standard together with the required B-EIA process are in alignment with the supplementary component.

### **Conclusion on GSSI Supplementary Component C.5.02.02**

#### **Conclusion:**

The ASC Shrimp Standard is in alignment because the standard includes

1) an indicator (5.2.1) with no allowance for intentional lethal predator control of any protected, threatened or endangered species as defined by the International Union for Conservation of Nature (IUCN) Red List, national listing processes, or other official lists.

#### **REFERENCES**

1. ASC Shrimp audit manual V 1.1 indicator 5.2.1:  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)
2. ASC Shrimp Standard V 1.1 indicator 5.2.1:  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)

### Essential Component C.6.01

*The standard requires the establishment, implementation and maintenance of an appropriate record keeping system for all seed that is intentionally stocked.*

#### ▪ GLOBAL G.A.P. comment

Evidence does not mention “source of seed” or “date of purchase” or “vaccination record of the seed” or “stocked seed batch identification” as per guidance text.

Evidence neither mentions: "Verification is expected to include a review of evidence that the system is operational and fit for purpose."

link to variance request is not working.

#### ▪ GSSI response

Following the comments by Global G.A.P., no changes were made to the conclusion on ASC's alignment with C6.01, however, the link in the reference list has been updated.

ASC has reported a recent update to their website, which has caused this error. Please see revised link here: <https://www.asc-aqua.org/what-you-can-do/get-certified/variance-request-interpretation-platform/QA0026/> . This covers record keeping of stocked seed.

### Conclusion on GSSI Essential Component C.6.01

#### Conclusion:

The ASC Shrimp Standard is in alignment because the standard includes an indicator that requires:

- 1) calculation of survival rate from stocking to harvest. To obtain an accurate estimation of survival rate, records on seed stocking in individual ponds is needed.
- 2) documentation of disease-free status and compliance with regional, national and international importation guidelines
- 3) seed production in a hatchery.
- 4) The ASC Interpretations Platform QA 87 includes the following statement:"The UoC shall provide evidence that traceability per pond or batch from stocking to harvest (see % pond survival rate) is recorded for calculation of the survival rate (SR) Indicator 5.1.3 – Survival Rate (SR)
- 5) the origin of wild-caught broodstock to be sourced from locally fished broodstock only

#### REFERENCES

1. ASC Shrimp audit manual V 1.1 Indicator 5.1.3, 6.2.1, 6.2.2 and 6.2.3  
[https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Shrimp-Audit-Manual_v1.1.pdf)
2. ASC Shrimp Standard V 1.1 Indicator 5.1.3, 6.2.1, 6.2.2 and 6.2.3  
[https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard\\_v1.1\\_Final.pdf](https://www.asc-aqua.org/wp-content/uploads/2019/03/ASC-Shrimp-Standard_v1.1_Final.pdf)



3. QA 87

<https://asc-aqua.org/producers/farm-standards/variance-request-and-interpretation/QA0026/>