

Haarlem, 10th October 2023

Subject: Response to Sea Choice comments Aquaculture Stewardship Council (ASC) Public Consultation

Dear Kelly,

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

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 A – Governance

Essential Component A.1.01

The Scheme Owner is a legal entity, or an organization that is a partnership of legal entities, or a government or inter-governmental agency.

■ Sea Choice comment

For section A, we draw attention to our SeaChoice report, Accountability in Seafood Sustainability: <https://www.seachoice.org/wp-content/uploads/2021/05/Accountability-in-Seafood-Sustainability.pdf> and the ASC assessment: <https://www.seachoice.org/wp-content/uploads/2021/05/ASC-assessment.pdf>

■ GSSI response

Following the comments by Sea Choice, no changes have been made to the conclusion of Component A1.01. The Independent Experts have reviewed the SeaChoice Report and evidence presented there was not relevant for the scope of the Benchmark Framework. The Scheme Owner is aligned with the requirements of this GSSI component.

Conclusion on GSSI Essential Component A.1.01

Conclusion:

ASC is in alignment because

- 1) the detail provided within the Deed of Incorporation of Stichting Aquaculture Stewardship Council Foundation shows that ASC is incorporated as a Foundation and has adopted Articles of Association in which it is governed.
- 2) ASC is also a registered charity (1150418) as of Jan 9, 2013 and is incorporated as a private limited company (8172832) since Aug 8, 2012

REFERENCES

1. Registration Certificate
2. ASC Deed Stichting ASC Foundation
3. ASC UK Certificate of Incorporation

Essential Component A.1.03

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

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

- *quality assurance program.*

▪ **Sea Choice comment**

It's unclear, based on the references provided, how a stakeholder can apply to join the TWGs? Also, is there evidence of: "review of previous stakeholder input and verify if/how this reached top governance"?

▪ **GSSI response**

Processes are described in the ASC Standard Setting Procedure, and the Technical Advisory Group (TAG) Terms of Reference, which manage the TWG. Both documents are publicly available on the ASC website under Governance. No new, relevant information that would impact alignment.

Conclusion on GSSI Essential Component A.1.03

Conclusion:

ASC is in alignment because:

1) the ultimate decision making governance body is the Supervisory Board (SB) as per explained in the ASC Standard Setting Procedure: . The Supervisory Board regulations cover balance and interests for the group and has the ultimate decision-making authority. The Supervisory Board is guided by the Technical Advisory Group (TAG). However, each standard development/revision process has its own governance structure, which is included in ToRs. Stakeholder can apply to join TWGs who work to develop standards content. The ASC governance bodies have balance of industry and non-industry members. The ASC Board was recently updated and there was a call for applications by ASC through a variety of media. 2) There is also an ASC Whistle Blower Policy, Complaints Procedure and a Conflict of Issue Policy that are applicable to ASC's SB and TAG bodies. 3) ASC's quality assurance program is coordinated by the Policy and Programme Management Team.

REFERENCES

1. ASC Technical Governance Structure Dec 2022
2. ASC Teams - Website
<https://www.asc-aqua.org/about-us/team/>
3. ASC Whistle-blower Policy V1.0
https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Whistle-blower-Policy_v1.0_FINAL_20120927.pdf
4. Governance - ASC Website
<https://www.asc-aqua.org/about-us/governance/>
5. Deed-Stichting ASC-Foundation
https://www.asc-aqua.org/wp-content/uploads/2017/07/100407-Deed-Stichting-ASC-Foundation_English-translation.pdf
6. Partners and Supporters - ASC Website
<https://www.asc-aqua.org/about-us/partners-and-supporters/>
7. TAG Conflict of Issue Policy V1.0 Nov 2020

- 8. TOR- Technical Advisory Group (TAG)
- 9. <https://www.asc-aqua.org/wp-content/uploads/2021/11/Terms-of-Reference-ASC-Technical-Advisory-Group-v2.1-Approved-08Nov2021.pdf>
- 10. ASC Certification and Accreditation Requirements V 2.2
https://www.asc-aqua.org/wp-content/uploads/2019/04/ASC-CAR-v.2.2_including-Group-Certification-April-2019.pdf
- 11. ASC Combined Accounts 2020
https://www.asc-aqua.org/wp-content/uploads/2022/06/2020-YE-Website_ASC-Combined-Accounts-YE-31-Dec-2020.pdf
- 12. ASC Complaints Procedure V1.0
https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Complaints-Procedure_V1.0-1.pdf
- 13. ASC Facts
<https://www.asc-aqua.org/about-us/15-facts-about-the-asc/>
- 14. ASC Regulations for Executive Board
https://www.asc-aqua.org/wp-content/uploads/2017/06/var_www_asc2010_upload_20110421_Regulations_EB_posted_on_website.pdf
- 15. ASC Regulations for Supervisory Board
https://www.asc-aqua.org/wp-content/uploads/2017/06/var_www_asc2010_upload_20110421_Regulations_SB_posted_on_website.pdf
- 16. ASC Senior Management Structure
- 17. ASC Standard Setting Procedure V2.0 - Page 5 -Section 7. Governance structure and responsibility
<https://www.asc-aqua.org/wp-content/uploads/2021/11/ASC-Standard-Setting-Procedure-v2.0.pdf>

Essential Component A.3.06

The Scheme Owner allows for comments on the standard to be submitted by any interested party at any time and considers them during the subsequent standards revision process.

■ Sea Choice comment

Is there evidence that shows logged stakeholder comments then make it into the subsequent revision?

■ GSSI response

Following the comments by Sea Choice, no changes have been made to the conclusion of Component A3.06. No new, relevant information has been provided that would impact alignment.

The process is defined by ASC standard-setting procedures and ToRs for the revision or development of standards. ASC website sections on Public Consultation and Programme Improvement show how stakeholder comments are considered. Refer to the development of the Aligned ASC Farm Standard as an example.

Conclusion on GSSI Essential Component A.3.06

Conclusion:

ASC is in alignment because:

1) stakeholders are able to submit comments at anytime as listed on ASC's Provide Input page and ASC Standards page (via ASC's general email standards@asc-aqua.org) This feedback is centrally logged via ASC's internal Issue Log Procedure and it is considered in future development in accordance with ASC's Standard-setting procedure

From Standard-setting Procedure Section 9.1.3: Stakeholders are encouraged to share their feedback, concerns, or proposals to develop a new standard, review/revise an existing one or comment on processes and procedures. The ASC Website provides information on how to submit these.

REFERENCES

1. (Confidential) ASC Issue Log Procedure V1.1
2. ASC Standard-setting Procedure V 2.0 - Section 9.1.3
<https://www.asc-aqua.org/wp-content/uploads/2021/11/ASC-Standard-Setting-Procedure-v2.0.pdf>
3. ASC's Farm Standard website with contact
<https://www.asc-aqua.org/what-we-do/our-standards/farm-standards/>
4. ASC's Provide Input website
<https://www.asc-aqua.org/what-you-can-do/participate/provide-input/>

Supplementary Component A.3.14.01

The Scheme Owner makes publicly available a synopsis of how these comments were addressed and sends the synopsis to all parties that submitted comments.

■ Sea Choice comment

The publication of how comments were addressed has not always been consistent. Please see our accountability review here: <https://www.seachoice.org/wp-content/uploads/2021/05/ASC-assessment.pdf> and <https://www.seachoice.org/wp-content/uploads/2021/05/Accountability-in-Seafood-Sustainability.pdf> GSSI response

- **GSSI response**

Following the comments by Sea Choice, no changes have been made to the conclusion of Component A3.14.01. No new, relevant information has been presented that would impact alignment. The Scheme Owner follows procedures and protocols for publication and submission.

Conclusion on GSSI Supplementary Component A.3.14.01

Conclusion:

ASC is in compliance because

- 1) the details regarding ASC's responses to public comments are explicit in ASC's Standard-setting Procedure Section 9.7.2: The Secretariat will objectively analyse the received comments and prepare written responses to stakeholders. These responses will include (but not be limited to) details as to how issues are intended to be addressed in the next draft; as well as providing justification when issues raised are deemed not applicable and/or will not be incorporated in the next draft.
- 2) synopsis of comments are sent via e-mail to parties who submitted comments as well as made available on the ASC website

REFERENCES

1. ASC Standard-setting Procedure V 2.0 Section 9.7.2
<https://www.asc-aqua.org/wp-content/uploads/2021/11/ASC-Standard-Setting-Procedure-v2.0.pdf>
2. Shrimp V 1.2 Public Consultation Record
https://www.asc-aqua.org/wp-content/uploads/2020/09/Feedback_Public-Consultation-Spring-2020_Shrimp_20200902_final-1.xlsx

- **Section B – Scheme Management**

Essential Component B.2.11

The Scheme Owner requires that the scope of the (re-)certification audit includes a visit to locations pertinent to the scope of the certification.

- **Sea Choice comment**

The recertification procedures are not the same as the initial audit. For example, the initial audit requires the farm to be in cycle, while recertification can be done during fallow. Recommend adding recertification procedures. Also, what about covid remote procedures?

- **GSSI response**

Following the comments by Sea Choice, no changes have been made to the conclusion of Component B2.11. Procedures for Re-certification Audits are in the ASC Certification and Accreditation Requirements Part B (Operational Certification Requirements) Section 17.16.

Covid remote procedures are not allowed under the Global Benchmark Tool framework, however, in 2020 'GSSI Management of Extraordinary Events Policy' came into effect that allowed for remote procedures under certain circumstances, eg. The travel restrictions due to COVID-19.

Conclusion on GSSI Essential Component B.2.11

Conclusion:

ASC is in alignment because:

- 1) the ASC CAR V2.2 Part B, Operational Certification Requirements, state under Section 17.15.4. to consider "all aspects of the production cycle" ; under Section 17.15.6 that the CAB must undertake "no fewer than 2 surveillance audits during a certificate validity" and under Section 17.15.10.6 "sample of sites and records to verify that management systems are effective and consistent".
- 2) Under ASC CAR V2.2 Part B Section 17.4 Audit Timing, it is required that the audit take place during the time of harvesting (17.4.2) or when processing operations are taking place (17.4.4) .
- 3) ASC CAR V2.2 Annex F, Requirements for Certification for Producer Groups, under Section 4.7 require on-site audits and sampling of sites.

ASC's recently released CAR V2.3_July 2022 further clarifies Audit Timing under sections:

8.2. The CAB shall conduct an initial on-site audit only when the site(s) has completed one of the following periods, whichever is less:

- a) Been in operation no less than twelve (12) months, or
- b) Completed one harvest cycle, with similar operational conditions or
- c) Reached 75% of the peak biomass for long cycle species.

8.3. The CAB shall schedule audits only when the facilities are in normal production or the species in the scope of the UoC is present on site and:

- a) Fifty percent (50 %) of the production units are under operation for single-site UoC.

REFERENCES

1. ASC CAR 2.3 Section 8
<https://www.asc-aqua.org/wp-content/uploads/2022/07/ASC-Farm-CAR-v2.3-July-22-1.pdf>
2. ASC Certification and Accreditation Requirements V 2.2 Section 17.15.6
https://www.asc-aqua.org/wp-content/uploads/2019/04/ASC-CAR-v.2.2_including-Group-Certification-April-2019.pdf

- **Section C – Salmon Standard**

- **Essential Component – All components**

- **Sea Choice comment**

The following comment is relevant for ALL components for Section C. Audits do not assess the full production cycle, as intermediary farms are excluded. Meaning up to 18 months of the production cycle is not audited for prophylactic use, etc. See: <https://asc-aqua.org/producers/farm-standards/variance-request-and-interpretation/QA0011/>

- **GSSI response**

Following the comment by Sea Choice relating to all components, no changes have been made to the conclusions or evidence provided. As per [QA 11](#), the scope of the standard is for final grow-out sites.

Conclusion on GSSI Essential Component

Conclusion: *Add conclusion here. In case any changes are made, please make text blue.*

REFERENCES

1. n/a
2. n/a
3. n/a

C.1.01.01 Supplementary Component

The standard prohibits the use of antimicrobials listed by the World Health Organization (WHO) as highly and critically important to human health.

- **Sea Choice comment**

What about WHO highly important antibiotics as per the component text?

- **GSSI response**

Following the comments by Sea Choice, no changes have been made to the conclusion of Component C1.01.01. Requirement 5.2.12 of ASC Salmon Standard does not allow the use of critically important antimicrobials (as per the WHO list). As per highly important antimicrobials, the standard seeks to balance the need of treatment (due to health and welfare issues), with the availability of effective antimicrobials. This effective antimicrobials might be listed as highly important.

Conclusion on GSSI C.1.01.01 Supplementary Component

Conclusion:

The ASC Salmon Standard is in alignment because the standard includes an indicator that prohibits the use of antibiotics listed as critically important for human medicine by the WHO. Fish treated with critically important antibiotics are no longer eligible to be sold as "ASC". During the audit, records of used antibiotics are cross-checked with the WHO-list. In case the farm has used critically important antibiotics, the auditor will verify if proper traceability systems are in place and applied to assure that treated fish are not sold as "ASC".

ASC released Salmon Standard V1.4 in Sept 2022 with updated WHO references.

REFERENCES

1. ASC Salmon Standard V 1.3, Indicators 5.2.1, 5.2.12 and 8.17:
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 5.2.1, 5.2.12 and 8.17
https://www.asc-aqua.org/wp-content/uploads/2019/11/ASC-Salmon-Audit-Manual_v1.3.pdf
3. Salmon V1.4
<https://www.asc-aqua.org/wp-content/uploads/2022/09/ASC-Salmon-Standard-v1.4-Final.pdf>