

Feed back on ASC Farm Standard – March 2022

Draft Standard- <https://www.asc-aqua.org/wp-content/uploads/2022/02/ASC-Farm-Standard-Public-Consultation-draft-EN-March-2022.pdf>

FAQs - <https://www.asc-aqua.org/wp-content/uploads/2022/03/FAQ-EN-ASC-Farm-Standard-PC-March-2022.pdf>

Cross-cutting.

We support the acknowledgment and use of area-based management approaches across various criteria. We believe the section on area-based management on page 107 related to disease and parasites could be expanded/modified to a cross-cutting ABM section that includes water quality as well as the current disease, and parasites and that includes a consideration and engagement with other resource users and local communities in ABM approaches. Habitat protection and restoration could also be included under ABM in order to tackle fragmentation of habitat by increasing the connectivity of protected or restored habitat between multiple farms.

Feedback

Principle 1. THE UOC OPERATES LEGALLY AND APPLIES EFFECTIVE BUSINESS MANAGEMENT

CRITERION 1.1 – LEGAL COMPLIANCE -page 15

Agree with bringing legal compliance indicators under one section

Indicator 1.1.1. The UoC shall be in possession of all required legal licenses and permits.

Agree, but was wondering what happens in cases where the licensing, permit process is overly complicated (e.g., Indonesia)?

Indicator 1.1.2. The UoC shall comply with all applicable environment-related laws and regulations

We support the clause, “when the ASC requirement offers better protection than the law, ASC requirements apply” as this covers the lack of EIAs in certain countries”.

Criterion 1.2 – Management System – page 16

No comments for any indicators

CRITERION 1.3 – BUSINESS ETHICS – page 17

We support the principle of making the corruption indicators critical as opposed to “optional”. However, it is not clear if the focus of this is on those who force these actions or those who are subject to it (including small and medium enterprises) and could be forced to pay bribes etc.,

CRITERION 1.4 – TRACEABILITY AND TRANSPARENT DISCLOSURE – page 18

Currently, no comments for any indicators

Principle 2: THE UOC OPERATES IN AN ENVIRONMENTALLY RESPONSIBLE MANNER

Criterion 2.2 – Ecologically Important Habitats – page 24

Indicator 2.2.1 - The UoC shall be sited outside of a Protected Area (PA), unless the farm was built legally prior to the designation of the PA, and is following allowed aquaculture activities

Agree

Indicator 2.2.3 - The UoC shall, if constructed before May 1999, successfully rehabilitate mangrove or other natural wetlands at a surface area equivalent to 50% of the lost surface area.

We support this indicator. Mangrove cover (and 50%) is a good initial indicator, but going forward factors to consider could include connectivity of this restored cover to habitats outside of the farm, the quality of this reforestation for example, species selection (is it the original species or a fast growing one?). Additional questions on this indicator include is there a proposed timeline to successfully rehabilitate habitat and what will be indicators be?

Indicator 2.2.4. The UoC shall not construct or expand farm operations inside other sensitive or critical habitats, not already addressed through indicators.

We support this indicator, but note that sensitive habitats such as seagrass meadows that are identified in the footnotes can be impacted by the actions of farms that aren't sited within them. Would this be a consideration under the Risk Management Framework?

Indicator 2.2.5 - The UoC shall not construct or expand its facilities in mangrove ecosystem or other natural wetlands, after May 1999.

Is it also possible that farms were constructed in these areas post May 1999? As I think Ramsar includes manmade wetlands (including aquaculture ponds)?

Indicator 2.2.6 - The UoC shall only maintain or establish pumping stations, water pipes or canals in mangrove or other natural wetlands after May 1999, provided that a surface area equivalent to 100% of the lost surface area is successfully rehabilitated.

Does use of the phrase “equivalent” suggest afforestation or habitat offsetting - as opposed to rehabilitating the impacted area? A timeline for successful rehabilitation is recommended.

Indicator 2.2.7 - The UoC should, where possible, identify means to provide for habitats likely to enhance biodiversity at the site level, such as through the greening of dykes or maintaining unstocked ponds for migrating birds

Agree and support this criteria, but could it be strengthened from identify to “identify the means and engage in activities to provide for habitats...”. Identification could/should include issues related to connectivity with neighboring habitats, and quality (e.g., using appropriate native species) etc.,. This process should also involve community stakeholders and other resource users.

Note that as it stands, this indicator covers attempts to provide habitat and not successful outcomes.

Note that regeneration/restoration provides opportunities for reducing/offsetting GHG emissions which has implications for Criteria 2.11

Requirement on the ASC Risk Management Framework:

We support measures to reduce the risk of significant negative impact on sensitive and critical habitats, as well as measures to rehabilitate mangrove and wetland habitats and indicators to monitor the effectiveness of measures. We suggest that the RMF consider impacts and indicators across whole areas as opposed to individual farms and consults with local communities and stakeholders.

Indicator 2.2.9 – Planning:

We support that in addition to considering the impact on local communities and groups, that the development of the site-specific Risk Management Plan (RMP) for habitats involve local communities and resource users. We also support publishing the RMP.

Indicator 2.2.10 – Implementation

In addition to the environmental components, we support adding a measure to reduce impact on local communities, groups and other resource users as this is part of the assessment (2.2.8)

Criterion 2.3 – The UoC minimises wildlife interactions – page 27

Indicator 2.3.2 The UoC shall not intentionally or unintentionally kill mammals, elasmobranchs, birds, or reptiles (excluding vermin), unless for situations where injured animals are unlikely to recover, situations evidently threatening human safety, or where legal requirements mandate euthanasiation.

We agree that producers cannot control all circumstances and support this indicator. However, any mortalities or interactions should be recorded and reported preferably publicly as noted by the RMP.

Criterion 2.4 – The UoC avoids the culture of new non-native species

No comments

Criterion 2.5 – Escapes – page 33

Following our earlier feedback, and due to the challenges of counting and determining how fish have been lost we support the setting limits to the types of events you describe for marine finfish only. As long as these losses are reported.

Requirement on the ASC Risk Management Framework:

Indicator 2.5.8 - Implementation

We support the inclusion of the previously proposed Escape Management Plan (EMP) under the Risk Management Framework/Plan but ask that metrics on escapes be published.

Criterion 2.6 – Benthic Impacts -page 38

Indicator 2.6.1. The UoC shall monitor seabed organic enrichment following the benthic monitoring programme outlined in Appendix I.

To complement indicators on veterinary drug use we support an assessment of veterinary drug residues within the benthos in addition to those listed for organic enrichment and benthic biodiversity.

Criterion 2.7 – Water Quality – page 54

Key considerations and recommendations regarding the proposal for a revised indicator of water quality for open systems discharging into lakes and reservoirs.

It is envisaged that ASC will present this final aligned indicator for public consultation in September 2022 together with the recommendations for the other production systems and water types.

1.2. Assimilative capacity modelling

1) In smaller (<1,000km²) ultra-oligotrophic lakes, to allow certification of cage farms providing that an assimilative capacity study has shown there will be no change in trophic status (subject to qualifications associated with N & P limiting conditions discussed below)

We support the use of assimilative capacity studies in this and other recommendations.

Area-based management

We support setting absolute limits on nutrient concentrations in receiving waters based on carrying capacity studies on the waterbody and basing individual farm discharge on a consideration of these for all finfish and crustacean species. If there are unacceptable impacts we agree that certified farms have a responsibility for collective action and stewardship – demonstrated through greater collaboration in data sharing and management perhaps through a Water Quality Management Plan or an Area- Based Management Plan that combines, farm siting and management of water quality, disease and parasite management and supports greater data sharing and collaboration across these and other issues.

However, we note, this does not account for other non-certified farms and other resource users that will also be impacting on water quality.

Criterion 2.8 – Salinisation – page 64

No comments

Criterion 2.9 – Biosolids -page 67

Indicator 2.9.1 – The UoC shall carry out an assessment, to identify and document the following:

locations where biosolids accumulate and are removed - potential contamination of biosolids through salinity, disease, drug residues, residues of other hazardous waste - when feeding is used: estimate concentration of key nutrients (N, P) - options for on-site containment of biosolids

We support the inclusion of an assessment of drug residues in the above list.

Criterion 2.10 – Freshwater Use – page 69

No comments

Criterion 2.11 – Energy Use and Greenhouse Gas Emissions – page 72

Indicator 2.11.2. The UoC shall annually calculate the quantity of GHG emissions produced, in kg CO₂-eq per tonne of farm-gate production, following the method outlined in Annex 2,

including total emissions and emissions from each of: a) on-farm energy consumption, b) feed, and c) on-farm consumption of other inputs.

Although we appreciate the complexities, is it possible to incorporate land use changes and subsequent GHG emissions and/or loss of GHG sequestration into this section or Criterion 2.2 Habitat?

Criterion 2.12 – Material Use, Waste and Pollution Control

No comments

Criterion 2.13 – Feed – page 80

Indicator 2.13.1 - Indicator scope: species fed manufactured feed external to that found within the ASC production system . The UoC shall only feed ASC compliant product to ASC certified production, unless feeding seaweed as a direct feed source. The requirement to feed ASC compliant product applies as of September 2024, giving producers two years of transition from the effective date of the ASC Feed Standard.

We note that there is no mention that the UoC is required to identify and report on its feed suppliers, but wouldn't this be needed to demonstrate compliance with the feed standard?

We recommend that this be included in guidance on reporting against this indicator.

The reason for highlighting this is that feed suppliers (and often the source fisheries) are currently included and reported against under current farm standards and made public via the ASC certification reports. Identifying suppliers and their source fisheries has been valuable to SFP as it enabled us to quickly identify feed suppliers and their associated sustainability commitments and activities and we support the continued identification of feed suppliers under the feed or traceability criteria.

Criterion 2.14 – Fish Health and Welfare – page 82

Requirement for a site-specific Fish Health and Welfare Management Plan:

Indicator 2.14.13. a) The UoC shall implement a site-specific Fish Health and Welfare Management Plan (FHMP), with the objective to prevent disease outbreaks and ensure optimal health of farmed animals

We believe that the FHMP should include beyond-farm measures for both the prevention and treatment of disease including coordinated treatments between farms in order to reduce the use of veterinary drugs. We suggest that coordinated actions be considered following persistent outbreaks of disease within a farming area or neighboring farms.

Indicator 2.14.13. b) The UoC shall, as part of the FHMP, outline site-specific disease monitoring, response mechanisms and reporting requirements (including reporting OIE-notifiable disease to authorities

We support much greater public reporting on disease reporting (especially for sectors outside of salmon). Reporting to organizations associated with the OIE is the minimum. From a review of the website it is clear that this not take place at the moment across all geographies.

Criterion 2.15 – Parasite control – page 86

Indicator 2.15.9 The UoC shall apply treatment rotation providing that the farm has >1 effective parasiticide available, with every third treatment.

We believe any treatments should be coordinated with neighboring farms similar to the suggestion made for the FHMP.

Requirement for a site-specific Integrated Parasite Management Plan (IPMP):

Indicator 2.15.11 - a) The UoC shall develop and implement a site-specific Integrated Parasite Management Plan (IPMP), with the objective to control parasites using multiple prevention and control strategies (e.g. research, coordination, monitoring, treatments)

As in the case of the FHMP, we believe that the IPMP should include inter-farm coordinated measures for both the prevention and treatment of parasites in order to reduce the use of chemicals and minimize resistance as in the case for sea lice. We suggest that at the minimum coordinated actions be considered following persistent outbreaks of disease within a farming area or neighboring farms.

Scope criterion 2.15 Sea Lice – Every UoC culturing salmon unless where stated otherwise within indicators.

Indicator 2.15.14. The UoC shall participate in an Area-Based Management (ABM) scheme for managing disease, parasites and resistance to treatments that includes coordination of stocking, fallowing, therapeutic treatments, and information sharing, as outlined in Appendix II-1 “Attributes and required components of the ABM”.

Agree, we strongly support this inclusion. Although note that production management areas in Norway may be at a larger scale than the defined “area” although this is covered by being already a regulatory requirement of the farm’s jurisdiction. We also strongly support greater public reporting on these area-approaches by certain salmon industries.

Criterion 2.16 – Antibiotics and other Veterinary Therapeutants -page 99

Indicator 2.16.12. The UoC shall not use antimicrobials listed as Critically Important Antimicrobials for Human Medicine¹⁷⁶ by the World Health Organisation (WHO), unless there is no alternative treatment for the specific bacterial pathologies and the following criteria are fulfilled:

Suggest more caution regarding the use of antimicrobials in general. For example, that critically important antimicrobials as per WHO, or indeed any associated with human health, shall not be used at all (no exemptions).

Requirements on disclosure and reporting:

Indicator 2.16.17. The UoC shall annually publicly disclose: - the antibiotic load per production cycle¹⁸⁰ against volume of product produced - use of antimicrobials listed as Critically Important Antimicrobials for Human Medicine by the WHO.

Strongly agree as this is an area where there is very limited information and public disclosure.

Criterion 2.17 – Hatcheries and Intermediate Sites – page 104

Farms will have the option to have qualified third-party auditors conduct audits, in which case a single audit could be used by multiple producers sourcing from that hatchery

Question the use of “have the option” to have qualified third-party auditors conduct the audits and the use of internal supply chain audits as alternative. Would this lead to audits of varying quality and rigour and questions over impartiality? Species such as salmon with a longer pre-grow out phase might be particularly susceptible.

Criterion 2.18 – Area Based Management – page 107

Indicator 2.18.1. Indicator scope: cage culture. The UoC shall participate in an Area Based Management (ABM) scheme for managing diseases, parasites and resistance to treatments (Annex 13). In areas where these schemes do not exist, the UoC shall provide evidence of working towards establishing one within the certification cycle, i.e. within three (3) years.

We strongly support the inclusion of this indicator as it addresses some of our earlier comments. However, it could be applied to all farm-systems (ponds etc), not just cage culture. The concept of ABM also has opportunities to be expanded from disease and parasite management to water quality and habitat protection criterions.

Indicator 2.18.5. The UoC shall engage/demonstrate commitment to collaborate with NGOs, academics, and governments on areas of mutually agreed research to measure possible impacts on communities, wild stocks, the wider ecosystem and essential ecosystem services on which wildlife depend.

Agreed wider area-based approaches that go beyond the farm open up opportunities to include other resource users, stakeholders and improve whole ecosystems. This has implications for Habitat criteria (2.2) as well as water quality.

PRINCIPLE 3 - THE UOC OPERATES IN A SOCIALLY RESPONSIBLE MANNER

Criterion 3.1 – Rights Awareness – page 112

Agree

Criterion 3.2 – Forced, Bonded, Compulsory Labour and Human Trafficking – page 115

Agree

Criterion 3.3 – Child Labour – page 119

Agree and especially the priority given to school attendance. On the issue of children aged 13 up conducting light work, we agree that this sounds like the standard encourages children to conduct light work which could be perceived incorrectly.

Criterion 3.4 – Discrimination – page 123

Agree

Criterion 3.5 – Health and Safety – page 125

Agree

Criterion 3.6 – Collective Bargaining and Freedom of Association -page 131

Indicator 3.6.4 - The UoC shall, in areas where the right to freedom of association is restricted by law, accept comparable means for freedom of association and collective bargaining.

These criteria generally cover the acceptance of collective bargaining by the UoC, but should evidence of collective bargaining, establishments of groups, or improvements resulting from this also be included?

Criterion 3.7 – Transparent Contracts - page 132

Agree – No comments

Criterion 3.8 – Wages -page 134

Agree – No comments

Criterion 3.9 – Working Hours – page 136

Agree – No comments

Criterion 3.10 – Workplace Conduct Response – page 140

Agree – No comments

Criterion 3.11 – Employee Accommodation – page 142

Agree – No comments

Criterion 3.12 – Grievance Mechanism – page 144

Agree – No comments

Criterion 3.13 – Community Engagement – page 146

Indicator 3.13.5. The UoC shall proactively engage with Indigenous and tribal peoples, and the local community to periodically identify, avoid or mitigate significant negative social impacts resulting from activities of the UoC.

Could this be strengthened by removing “periodically”. Although this seems to be covered by the Risk Management Framework. We believe there is an opportunity to include community engagement in aspects of area-based management, specifically water quality and habitat protection.

Indicator 3.13.6. The UoC shall have a grievance procedure accessible and applicable to Indigenous and tribal peoples, and the local community, which incorporates all elements included in Annex 5.

We believe that the grievance procedure should also include evidence that any issue is investigated and resolved

ASC STANDARD ALIGNMENT PUBLIC CONSULTATION
INPUT AND FEED BACK OF [REDACTED]

The people signing this document kindly request to the ASC Standard to take as input in the open Public Consultation.

We appreciate sensitive consideration to the following:

- **Indicator 1.4.6:** The disclosure of the therapeutants and non-therapeutants applied to the products to all the byers for every delivery is not easy at this point, considering the number of different lots that need to be managed daily. All the information is available, it is controlled during the audits, and it can be shared with byers upon request, but reporting for every delivery requires additional resources from the producer's side. When a byer receives multiple lots with different number of therapies, it can lead to confusion. Also, this could create problems with the byers if for example one delivery was treated with one cycle and the next delivery received 2 cycles, or if other producer sold to the same client with less treatments.

- **Indicator 2.2:** In Greece, sites can be sited within a protected area (mainly Natura 2000 areas). In those cases, it is addressed in the Environmental Impact Assessment and the additional Ecological Assessment required. Also, in the final environmental license, there are additional requirements set, depending on the type of PA.
With the Spatial Planning for Aquaculture still pending in Greece and the expected activation of the Areas of Aquaculture Development, farms can be moved into PA.
The sitting in a PA like Natura areas that are not Critical Habitats, should be allowed as long as there is an official risk assessment.

- **Indicators 2.3.2 & 2.3.10:** The proposed alignment requirements do not consider the conditions of the bird's ecology of the Mediterranean. Counts of bird indicators are not realistic.
In many cases in the Mediterranean farms, there is an important presence of birds (essentially non threatened species: herons, seagulls). Although the net cages are equipped with bird nets which are maintained, properly placed over the cages and replaced whenever torn, the number of birds present in the farm is very important and it is inevitable not to have injuries and/or unintentionally kill.
These unintentional kills are recorded at a farm level, but if they are publicly disclosed, they can create a false image of the farms located in areas with an important presence of birds. If the reporting requirement is kept for non threatened birds as well, the frequency of the report should be once or twice a year, not 30 days post event.

- **Indicator 2.5.1:** these past years, the Mediterranean aquaculture suffered from extreme weather conditions. These are situations that cannot be controlled, and although farmers are taking measures to protect the farms, we still have to deal with extreme situations. The 9 years period for one mass escape event (defined as an escape of >4% of batch) does not seem realistic. If a farm is affected by an extreme weather condition, it won't lose fish from one batch only, but from the whole farm.

We consider that the mass escape event should be defined as an escape of >4% of the farm, and with an allowance of 1 mass escape event every 3 years (1 certification cycle).

- **Indicator 2.5.9 - 11:** the escapes count for bass & bream are based on estimations that can be corrected later. The time frame requested for disclosure is very small, the data might need correction and create confusion.

Additionally, there are cases where stocks are kept for as long as 6 years, to cover demand for big fish, for which escapes cannot be counted.

- **2.5.12:**
 - Significant differences exist between the conditions of the production of sea bass and seabream VS salmon. The size of the fish at stocking (2-15 gr) represents a challenge to find exactitude in counting fish with the current available technology. We are requesting extended error space in accordance with the reality of the production, 1% does not seem realistic for this type of fish.
 - The understanding of “Unaccounted lose” shall be redefine, precise, and accepted (as the same) by all auditors: what do we consider as “initial stock count”? **(a)** when fish enters the farm (in that case, a 2% accuracy is difficult to achieve, it depends on the size of the fingerlings and the counting technology available in the hatcheries or the pre-growing units) – **(b)** when the fish is counted or vaccinated in the farm? In that case, what about the fish that is vaccinated in a pre-growing facility?
 - In the formula provided, the escapes are not counted, and the mortalities are given with +2%. The accuracy of mortalities count for fish like meagre, bass and bream is difficult to prove, especially during the summer.
 - Also, cannibalism of this type of fish makes it even more difficult to achieve requested accuracy
- **Benthic Impacts:** Considering that the Seabass and Seabream production is NOT “all in all out” production system as salmon is, that the “production cycle” is longer than one year and it cannot be defined with precision (depends on the species, the required final weight etc.), the frequency of sampling should be defined in “years”. Greek Legislation requires a benthic sampling every 3 years between June and September. We request ASC to adopt the same frequency, at least for Tier 3 sampling.
- **Water Quality:** We are requesting to consider that the production of Seabass and Seabream is done in open Mediterranean waters consequently and the measurements of turbidity using Secchi disk is ineffective in such open see waters.
- **Indicator 2.12.22:** Disposal of Mortality. The removal of mortality in the Mediterranean varies according to farm location, however all farmers are sensitive to the impact on the

environment and mortalities can be managed in several ways, others than incineration and disposal by landfilling. We are requesting to allow other (approved by EU regulators) waste treatment systems other than fish incineration (e.g. used for producing fertilizers)

- **Indicator 2.14.13:** Post-mortem analysis is not performed on bass, bream, meagre & pagrus. In order to investigate a mortality event and to check the fish, the veterinarians need to sample from the live fish. The dead fish cannot give any useful information.
- **Indicator 2.15:** parasiticide residues in sediment should be measured for any type of parasiticide, even formaldehyde and hydrogen peroxide? Although formaldehyde and hydrogen peroxide are not to be counted as antiparasitics for the maximum allowed therapies, it is not clear if this exception applies also to the monitoring of antiparasitic residues in the sediment.
Parasites present in bass/bream/meagre do not have the same impact as lice in salmon, the requirements seem extremely demanding compared to the impact.
- **Annex 1 Species performance levels:**
 - 2.14 Morts removed 100%: cannot be documented, the biomass of mortalities recorded will never match the biomass removed
 - 2.14 Single year class: should be blank for bass/bream/meagre

We are grateful to have this opportunity to participate and express our input.

Signed on [REDACTED]

[REDACTED]

[REDACTED]

Dear [REDACTED]

Re: ASC Farm Standard Public Consultation V, Criterion 2.17 Intermediate Sites

As stakeholders to the ASC, and the industry it seeks to certify, we are formally submitting our comments and concerns regarding ASC Farm Standard's proposed compliance and verification requirements for the "pre-growout phase" under Criterion 2.17 - Hatcheries and Intermediate Sites.

We welcome the ASC addressing the issue of intermediary farms.

Currently the ASC "farmed responsibly" label on a farmed salmon product gives the impression to consumers that the salmon was "farmed responsibly" from hatchery to harvest. However, in actuality, an ASC-labelled salmon is likely to have met the ASC standard for only some of its production cycle: the hatchery and final growout farm stages. From a consumer perspective, this could be viewed as misleading.

The ASC's 2017 decision to exclude intermediary farms from compliance contravened the original intent of the Salmon Standard to "minimize or eliminate the social and environmental impacts" associated with a farmed salmon's production cycle. In practice, more than a year of a farmed salmon's production cycle can be left unassessed for environmental and social impacts against the ASC standard. This places a risk that irresponsible farming practices have gone unnoticed under the guise of ASC's "farmed responsibly" label.

We appreciate ASC has taken steps to reinstate this intent by requiring that the complete production cycle must comply with the new Farm Standard. This will help to eliminate gaps where irresponsible practices could be currently missed and still sold under the ASC label, as well as help to meet consumer expectations that the ASC label sustainability claim of "responsibly farmed" is applicable from egg to harvest – not just some of the cycle time.

However, any gains made by reinstating the intent are likely to be undermined by ASC's proposal to have the Unit of Certification (i.e. the growout farm applying for certification) internally audit their "suppliers" for standard compliance, instead of having third-party conformity assessment bodies (CABs) undertake the audit.

As growout salmon farms are typically owned by the same company that also owns and operates the hatchery and early net pen sites, this will result in companies auditing themselves for ASC compliance for a substantial portion of the production cycle (from 12 to 30 months out of a 36~ month farmed salmon production cycle).

Any ‘fox guarding the henhouse’ scenarios have no place in credible certifications.

As ASC is an ISEAL member, consumers should be able to trust that ASC is meeting ISEAL’s Credibility Principle of Impartiality:

“A credible sustainability system identifies and avoids or mitigates conflicts of interest throughout its governance and operations, particularly when it comes to assessing its users’ performance”.

In addition, ASC should comply with ISEAL’s Assurance Code of Good Practice, which states under “Rigour and Impartiality” that:

“Independent assessment is a necessary component of schemes that allow public claims of compliance. Third party, independent, accredited certification is the most credible form of assessment.”

We also point out that ASC’s lack of third-party auditing of pre-growout farm sites could be seen as a program weakness in comparison to its main competitor, the Best Aquaculture Practices (BAP). In addition to their Salmon Farm Standard for final growout farms, the BAP certification oversees a Finfish, Crustacean and Mollusk Hatcheries and Nurseries certification standard for pre-growout sites. This means under the BAP standards and process, the farming cycle from hatchery to harvest is audited by independent auditors.

The proposal to have the final growout site internally audit pre-growout “suppliers” for compliance with the standard – including those “suppliers” that are the very same company that owns the final growout – is unacceptable and a credibility risk for the ASC, as the auditing process lacks impartiality and independent oversight.

We strongly urge the ASC to amend its proposal for Criterion 2.17 to stipulate that ASC compliance for the complete production cycle must be verified by third-party accredited conformity assessment bodies, in line with ASC’s ISEAL obligations.

Signed,

Attachment - Survey Questionnaire Submission

Q. *By filling in this survey, I agree with my responses being made public. Your responses won't be attributed to your name or the name of your organisation. If you choose NO, the survey will be terminated and you won't be able to complete this survey.

Yes/No

Q. *Name: See Signatories

Q. *Organisation name: See Signatories

Q. *Type of affiliation: XXXXXXXXXX

Criterion 2.17 - Hatcheries and Intermediate Sites

Q. ASC aims to address the impact of pre-Grow Out sites (e.g. hatcheries) using the same indicators as for Grow Out sites. Do you agree this aim is feasible?

Answer options: **X strongly agree** – agree – neutral – disagree – strongly disagree + don't know / no opinion

Q. Which option do you prefer to verify compliance of the pre-Grow Out sites?

Option 1: on-site inspections of the pre-Grow Out sites by a qualified internal auditor from the Unit of Certification (UoC), using the ASC inspection template, reviewed by the Conformity Assessment Body (CAB) during the UoC audit with spot-checks as necessary by third-party auditors of intermediate sites in salmon production

Option 2: on-site audits by third party Conformity Assessment Body (CAB) auditors or by UoC auditors with equivalent qualifications

X Other - please specify: On-site audits by an accredited third-party Conformity Assessment Body (CAB).

Q. This proposal separates production into "pre-growout" and "growout", with the growout phase comprising the site of audit, or the Unit of Assessment (UoA). For finfish, the "pre-growout" phase will include any sites used prior to the harvest site (e.g. hatchery site, intermediate site or holding site). Shrimp will include any production units holding shrimp from PL25 onwards. Abalone and bivalve will include any sites from the point of translocation onwards.

Do you agree these definitions adequately cover the sites used and potential impacts as intended?

Answer options: strongly agree – **X agree** – neutral – disagree – strongly disagree + don't know / no opinion

Comment: **Broodstock sites should be included in the "pre-grow out" phase. Including broodstock sites, would change our answer to strongly agree.**

General Comments:

See Letter.

ASC public consultation – [REDACTED]

[REDACTED]

[REDACTED]

Criterion No.

2.2 ASC certified farms assess their impact on protected areas and areas with high biodiversity value, including mangroves. Do you agree that ASC certified farms should also assess the impact of their siting on other sensitive and critical habitats? ANSWER OPTIONS: **strongly agree**

2.2 Do you support a “site-specific” approach to determine necessary ecological buffer-width in relationship to relevant habitats (e.g., riparian buffers, protected areas, sensitive/critical habitats) and ecological functions to be protected. ANSWER OPTIONS: **agree**

2.2 ASC recognises that certain small scale aquaculture operations may have only had access to farm land after 1999. Should ASC consider a requirement that permits farm siting in mangroves after 1999, but only with the requirement that the farm must restore the same area (at least 100% of lost surface area) with same ecological functions? **Yes**

2.3 Do you agree with the proposed Indicator 2.3.2 to not allow any mortalities of mammals, elasmobranchs (sharks), birds or reptiles, unless any of the listed conditions apply? ANSWER OPTIONS: **strongly agree**

2.3 Do you agree with Indicator 2.3.3 to not allow the use of acoustic deterrent devices unless the farm can demonstrate that its use does not disturb cetaceans? ANSWER OPTIONS: **strongly agree**

2.3 ASC recognizes that even where effective mitigation measures are implemented, occasional unintentional bird mortalities will occur. Should ASC remove birds as a specified species group in indicator 2.3.2 and consider an allowable metric limit for birds? ANSWER OPTIONS: **neutral**

2.4 Should there be any other conditions where ASC should allow the culture of non-native species?
ANSWER OPTIONS: **disagree; under no other conditions non-native species can be stocked.**

2.4 Animal production must take place inside buildings built to withstand severe local weather conditions (e.g., tropical storms, flooding), and all effluents pass through multi-stage treatment systems including mechanical filtration prior to release.

Do you agree with the definition above?

ANSWER OPTIONS: **agree**

2.4 Current indicators do not address the special situation where non-native species have already become established or have been commercially farmed prior to 2010. However, continued farming of these non-native species in certain areas may have a remaining high potential to cause continued/new harm:

Should ASC add an indicator, requiring that non-native invasive species are only permitted under option 3) or 4) in indicator 2.4.1?

ANSWER OPTIONS: **strongly agree**

2.4 Should ASC add a separate indicator with more limited conditions for non-native species which can sexually mature during grow-out?

ANSWER OPTIONS: **agree**

2.5 Within this context, should ASC set more strict escape limits for specifically salmon, or, set consistent escape limits for all cage-culture species equally?

ASC should set consistent escape limits for all cage-culture species equally

2.5 Do you agree that not more than 4% of unaccounted fish loss should be permitted per production cycle (4%/cycle)?

ANSWER OPTIONS: **agree**

2.5 Do you agree that the percentage of unaccounted loss has to be reduced over time as a demonstration of improvement?

ANSWER OPTIONS: **neutral**

2.5 How should ASC handle the topic of escapes for culture systems such as ponds in areas of chronic flooding? This should not be made possible.

2.5 Do you agree it is realistic to expect all culture systems other than cages to have no mass escape events and no chronic leakage?

ANSWER OPTIONS: **strongly agree**

2.5 Do you agree with this 1% unaccounted stock criterion calculated over a 9-year period?

ANSWER OPTIONS: **disagree**

2.8 To reduce plastic waste ASC would like to prohibit the use of plastic liners. Do you agree that this is feasible?

ANSWER OPTIONS: **agree**

2.8 ASC would like to propose prohibiting the discharge of effluents over land since this can contribute to salinisation. Do you agree with this proposal?

ANSWER OPTIONS: **disagree**

Effluent from freshwater (RAS) farms do not contribute to salinization of the environment.

2.9 What methods do you use for responsible re-use of your biosolids?

Fertilizers and biogas

2.10

1. Does your production system require the addition of salt? **NO**
2. What is the annual/monthly/daily? change in salinity? (add scale options) **None**
3. Do you utilize desalination systems prior to discharge? **No**

2.12 Is it reasonable to require that farms contain hazardous materials to the extent that there would be no runoff during extreme weather events?

YES

2.12 Does the requirement that restricts the use of single use plastics impose a challenge according to your own circumstances. Please explain.

Yes, but it is doable

2.13

How many feed suppliers do you source from? **one**

From those, how many produce feed which meets current ASC farm standard requirements? **The one producer we use does**

2.14 Do you agree it is feasible to regularly remove mortalities and moribund animals and dispose of mortalities responsibly.

Answer options: **strongly agree**

2.15 Do you agree it is feasible to monitor parasiticide residue levels in the benthic sediment?

Answer options: **strongly agree**

2.15 Should ASC consider all types of parasiticides (e.g. including oral and bath)?

Answer options: **Yes**

2.16 ASC proposes to not allow Critically Important Antibiotics on ASC labelled products. Do you agree with this?

Answer options: **strongly agree**

2.16 ASC proposes to require an overtime reduction in the total antibiotic load. This would be a new requirement for all ASC certified farms. Do you agree with this requirement? Answer options: **agree**

2.17 ASC aims to address the impact of pre-Grow Out sites (e.g. hatcheries) using the same indicators as for Grow Out sites. Do you agree this aim is feasible?

Answer options: **disagree**

Specific criteria should be used for hatcheries

2.17 ASC suggests that the requirement to use ASC compliant feed from ASC certified feed mills applies from first feeding with pellets onwards. In other words, when no feed is used, live feed is used, crumble/granulates/micro-pellets <1.5mm or seaweed is used, the requirement to use ASC compliant feed does not apply. Is this a feasible balance between having robust feed requirements for the far majority of feed quantity but allowing some flexibility for very early stage feeding for which there is much less flexibility/options of sourcing? **YES**

Comments on ASC Farm Standard - Public Consultation V (P1, P2, P3) draft - March 2022

General comments

- In Greece, aquaculture units are typically small and located in small, protected gulfs and islets without large or particularly well-equipped vessels (typically, small boats or wooden platforms are used). Thus, on-board scientific analyses such as the measurement of free sulphides is extremely problematic or even impossible in many cases.
- The newly proposed ASC standard does not refer to the bottom/habitat classification, such as loose sediment, soft rock or hard substrates such as rock or reefs. Thus, we suggest to add the bottom classification via e.g. a grain size analyses (for loose sediments) and visual examination (e.g. with drop camera or ROV for hard / rocky substrates). This is important to be able to proceed with the suggested analyses such as free sulphides analyses or zoobenthos, which cannot be performed on hard substrates with the proposed protocol.
- In addition to the above, the standard does not elaborate at all on cases where the farms are located over hard substrates and the proposed analyses cannot be performed.
- Overall, the approach does not necessarily reduce burden on the farms, as intended, due to uncertainties in planning the time and budget required for certification: if Tier 1 succeeds, determination of EQS can be done in one day, if Tier 3 has to be performed, sampling time increases to several days and ~ 48 benthic samples have to be taxonomically analysed by a certified lab, which increases both the costs and the time for analyses (up to several months for 48 benthic samples); however this cannot be foreseen until Tier 1 has been performed.

Criterion 2.6- Benthic impacts

Table 2:

- Species Richness is not a very useful indicator as the number of species in undisturbed areas can be way lower than the 80 which define the HIGH status in Table 2. Muddy habitats or habitats with reduced salinity often have a much lower richness due to natural stressors, not anthropogenic
- The Shannon index is missing from Table 2 but is probably a better indicator than species richness
- Boundary values for M-AMBI can/ should be calibrated to regional areas, e.g. some countries have performed intercalibration exercises that deviate from these values
- BQI and BQI family should ideally be calculated per area as they may depend on regional species pools, e.g. the BQI family values have been calculated on Mediterranean species, so the boundaries may not be universal
- The BENTIX index has different boundaries depending on whether the sediment is >90% mud or not

Section 1.4 - Timing of sampling.

- If timed to production cycles which may be longer than one year, does this clash with Indicator 2.6.3 which requires annual reporting of the EQS to the ASC ?

Section 1.5 – Tiered sampling Approach.

- In Tier 1 and 2, is the reference zone to be taken into account? E.g. if the EQS based on sulphites at the reference zone are lower than HIGH/GOOD, can the results of the zones be adapted accordingly, as described also in Tier 3?
- Tier 3: Are there specifications on the sampling surface for the samples to be taken for taxonomic analyses? The sampling surface may influence the result, as species richness and the Shannon index increase initially with increased sampling surface, to some extent this applies also to the ecological indices. Thus, without determining a sampling surface (e.g. 0.1 m²) comparisons with Table 2 might not be possible.
- Tier 3: In the sentence “A minimum of three biotic indicator metrics shall be averaged to determine the EQS in each monitoring zone” it is unclear how this should be achieved, as all metrics work on a different scale

(e.g. AMBI from 0-7 with lower numbers = higher EQS, BENTIX from 1- <5 with higher numbers = higher EQS, BQI from 0-<20 with higher numbers = higher EQS). How is averaging to be achieved?

- Tier 3: Are benthic indices to be calculated per triplicate sample, or are triplicate samples to be pooled / averaged per station before calculating the results per station? Finally, to determine the EQS per zone per index, all station (or triplicate) results are to be averaged? Examples for the exact calculations would be useful to be included in the standard.
- Tier 3: When the area EQS at the farm (Reference Zone) is poor or bad, certification is not allowed according to the new revision. This should be determined as a first step, before starting with Tier 1 in order to avoid unnecessary sampling effort and analyses.

[REDACTED] has the following comments for the public hearing to the Farm Standard 30.4.2022

General comments:

1. VR:

It is important that the new Farm Standard include the problems and solutions raised in the different relevant VR from the former species-specific standards.

2. Risk Assessments

Requirements for risk assessments must be assessed in relation to the company's size, number of employees and risk. In addition, a light screening or scoping should be the entrance to assess, whether a full assessment is necessary or whether there may already be a sufficient assessment, e.g. prepared in connection with, for example, the installations' permit.

3. Specific App

It should not be mandatory to use an ASC-App or a specific ASC-system because of the following:

- The company can have its own systems
- There can be some confidential information's the company don't want to put in a app.
- For farm with one or a few workers they can be unfamiliar with the use of an app.

4. Further the indicators about sea-lice should only be mandatory for salmon farm in marine waters. Not for trout farming in brackish waters.

Introduction

S. 12: The standard should include pikeperch.

Princip 1:

1.2.1: s.17: footnote 11: The definition of "Management system" is not in the Definition List. If there is any demand for a specific Management system, it should undergo a public hearing. Further it is important that the level of complexity for the management System and the Risk Management Framework (RMF) reflect both the size of the company and the "risk" of its activities. No mandatory systems for farms with under 5 employees.

1.4.4.c: There should be a foot note about the possibility for allowance for use of oxolinic acid (as in the freshwater trout standard and VR). We [REDACTED] have several times raised the problem of using the WHO list without a possibility to make exemptions. We would like to raise ASC attention to the new work that is done in the EU Commission and EMEA (European Medicine Agency) of

banning important antibiotics. You can find more information here: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/11653-Drug-resistance-list-of-antimicrobial-medicines-reserved-for-treating-humans_en . And the EMA paper: https://www.ema.europa.eu/en/documents/regulatory-procedural-guideline/advice-designation-antimicrobials-groups-antimicrobials-reserved-treatment-certain-infections-humans/6-veterinary-medicinal-products_en.pdf

Princip 2:

2.2.1: There should be a possibility to place an aquaculture farm in a Protected area, if a habitat assessments conclude that the farm has no impact on the habitats or the protected species. Reference to the EU: Guidance on Aquaculture and Natura 2000
https://ec.europa.eu/environment/nature/natura2000/management/pdf/guidance_on_aquaculture_and_natura_2000_en.pdf

2.5

The criterion for Escapes should not apply for Fully Closed Farm. Closed Farms must have dispensation for this.

2.5.1: There should be a dispensation possibility for the demand of “no escapes” for land-based farms (not fully closed) due to the possibility of e.g.100 years events, black swans-events etc. The risk of flood is increasing due to climate change.

2.5.1: A value of 1 % of unexplained losses from a marine cage farm (over a 9 year period) is impossible to achieve. The counts must be incredibly accurate. In small farms like most of the Danish marine cage farms, where the counts are done manually and where the standing biomass is relatively small, very small deviations can quickly give a skewed result. Another problem is that predation from seals is an increasing problem in Denmark, and the numbers of dead/eaten by seals in the “dead-locker” in the bottom of the marine cage is difficult to count.

2.6. Environment Sampling (under Development from ASC)

Freshwater:

We advise to maintain the current requirement in the freshwater trout standard. (i.e. macroinvertebrate surveys in the receiving water body downstream and upstream of the effluent discharge point).

Marine water:

Comment for the proposed benthic impacts indicator for marine cage systems - the three-tiered sampling approach.

The objective of the revision is to define Criteria/Indicators to develop a system to measure the benthic impact of organic material emitted from a sea cage fish farm.

The proposed method cannot be applied to Danish waters due to the following:

- The inland fjords and straits around Denmark are estuarine in nature (brackish water with fluctuating salinity (5-25 ‰), and to some degree temperature). Surface waters are typically low salinity deriving from the Baltic Sea, whereas heavier more saline water from the North Sea/Atlantic enters along the sea floor. Areas of mixing occur in the Danish straits and the broad salinity spectrum has a significant influence on the occurrence and distribution of benthic fauna in the inner Danish waters both spatially and temporally, which will fluctuate due to season, location and climatic conditions.
- The Danish waters are strongly influenced by organic matter from other (mainly land-based) sources, the Baltic Sea and atmospheric deposition. We often see background conditions within brackish water fjords with a redox of -200 mV and paucity of benthic animal species. This means that due to natural conditions outside the farms control, the Danish Sea farms are concerned that they will not be able to adhere to the proposed criterium in the 3-tier system, even if they start directly at Tier 3.
- The new programme will require a more extensive sampling programme than already being implemented under the current standard (Salmon, v.1,3), with a larger number of sampling stations necessary. The three-tiered sampling approach is therefore targeted towards larger companies, with better financial and human resources to accommodate this change. It therefore presents a disproportionately larger financial burden for small businesses and smaller individual sea cage farms, such as those located around Denmark and the other Baltic Countries.

Previous benthic sampling in Denmark, has revealed that we do not have a "classic" fauna distribution which will support "transect process" theory, where the impact of aquaculture is more diluted as you move away from the fish farm, and the division into moderate, good, high quality does not apply here. Conditions at the reference stations would be considered at best to be moderate (most likely poor) under the new scale, and brackish water fjords in Denmark may have a redox of -200mV at all stations.

Furthermore, the redox potential / sulphide content is meant to be the primary measurement tool in the proposed 3-tier system. Redox is a very unstable tool to use in marine conditions. The Monitoring equipment (particularly the electrodes) are extremely sensitive and difficult to control in situ, and the oxidised layer can be very thin and unevenly spaced. ASC has knowledge of this problem with the number of variance requests sent to them from a range of different countries over the years.

The suggestion of measuring both REDOX and Sulphide, adds an extra cost, and one measurement could "knock out" the other measurement type. For most Danish Sea cage farms, it would be impossible to comply with the proposed requirements. We would have to move directly to the fauna monitoring system, which, as mentioned earlier, also is difficult to comply to under the proposed criteria.

- **Suggestion: Specific monitoring program for sea cage farms situated in brackish water with impact from land.**

In Denmark, the normal monitoring procedure is to measure for the accumulation of organic matter (ignitions loss of volatile compounds), , in the sediment under and around the fish farm, with a requirement that there should be no accumulation in these parameters over time. Sediment samples are normally taken every spring before stocking of fish and in some cases again in late autumn, at the point of highest biomass immediately before harvest, or sometimes after harvest.

2.7: Water Quality.

For freshwater / landbased farms there can be a calculation for max effluent of N and P due to a mass balance calculation. This supports the use of quality- and environmental-effective feed and management (FQ), and for landbased farms further the use of cleaning facilities, and best practice for biosolids management and re-use of nutrition as valuable fertilizer.

2.8.2: Salinity. This can cause problem if it is a zero-impact for freshwater-recipient, but if it is a max impact up to 0,05 % it can work.

2.8.4: This should only be a criterion if saltwater is used for farming in open dams and if there is a risk for contamination of the groundwater with salt from the specific farm.

2.9.1 og 2.9.2: Biosolids

2.9.1: Change from “potential contamination” to “potential unacceptable contamination”.

2.9.2: problem “uncontaminated”. If the standard work with a zero tolerance for contamination all biosolids can be classified as contaminated, and reuse of biosolids as fertilizer can be difficult in the standard. An example: Using antibiotic on a fish farm will always result in residues in the biosolids. This is the same as when treating pigs/cattle in a stable. Residues will end up in the manure, but this poses no risk for the environment when this manure/biosolid is used as fertilizers in agriculture.

2.10.2: “where well-monitoring is legally not allowed to be conducted by the UoC, regulatory records must be obtained to demonstrate no decreasing trend in water levels.” – The problem in Denmark is not the laws (regulatory records). The problem is the water-intake permission. To avoid risk of contamination of the groundwater the wells are closed; the water level in the ground water is followed by regional monitoring from the water-municipalities, and for having a water-intake permission the authorities have made a risk-assessment also concerning potential risk of influencing the ground water level.

So, the following must be added to the criteria: Unless the well is closed, and that the groundwater level is followed by the relevant authorities.

2.10.5: Risk Management Framework. A dispensation option should be added here, if the water-extraction authority has carried out a risk assessment in connection with the water extraction permit, and if the water extraction permit is to be reassessed at appropriate intervals.

2.11.: When we don't know the calculations methods it is not possible to relate to the thresholds. Further the threshold must be divided in different production system and for different species.

RAS farms are using quite a lot of energy, and immediately the values cannot be complied for some of the farms in Denmark although these farms use energy effective technology.

The exact calculations methods and the specific thresholds must undergo another public hearing.

2.12.5: we suggest to add: Unless a risk assessment from the local authorities concludes that discharge of hormone is acceptable, or another method is used to avoid hormone residues in the effluent.

2.14.10: Not acceptable. There can be findings of OIE-notifiable diseases where immediately cull of the batch is not necessary even in areas where the disease is not endemic. You should follow the rules/advice of the relevant authorities. There are many different OIE diseases with many different effects. Having a fixed rule of culling the batch is not realistic and in many cases not necessary.

2.14.12: It is unnecessary to do an antimicrobial test for all treatments. There should be a possibility for the veterinarian to skip the test if the Vet find it unnecessary.

Especially problematic for fry and fingerling production where antibiotic is often used. It is expensive to do a test every time and is unnecessary if the vet knows that a certain antibiotic will work.

2.15.1-2.15.13:

For some/many parasiticides a susceptibility test is not available and not necessary.

It is not clear if 2.15.3 – 2.15.13 covers land-based farming. It should describe that it only covers non-land-based farming.

Parasiticides can be medicines that are very "low-tech" e.g. formaldehyde or hydrogen peroxide. It makes no sense to look for these substances in sediments.

2.16.7: The text needs to be changes according to the text of 2.14.12, where it is described that the susceptibility test not necessarily needs to take place prior to each treatment.

2.16.12: Oxolinic acid is today accepted according to the Freshwater Trout Standard and the trout can still be sold as ASC.

We [REDACTED] have several times raised the problem of using the WHO list without a possibility to make exemptions. We would like to raise ASC attention to the new work that is done in the EU Commission and EMEA (European Medicine Agency) of banning important antibiotics. You can find more information here: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/11653-Drug-resistance-list-of-antimicrobial-medicines-reserved-for-treating-humans_en . And the EMA paper: <https://www.ema.europa.eu/en/documents/regulatory-procedural-guideline/advice->

[designation-antimicrobials-groups-antimicrobials-reserved-treatment-certain-infections-humans/6-veterinary-medicinal-products_en.pdf](https://www.asc-aqua.org/what-you-can-do/get-certified/variance-request-interpretation-platform/veterinary-medicinal-products_en.pdf)

Its important that oxolinic acid can be used in sea cage and in freshwater farm under certain circumstances. Ref: VR0445 on 5 - MANAGE DISEASE AND PESTS IN AN ENVIRONMENTALLY RESPONSIBLE MANNER. <https://www.asc-aqua.org/what-you-can-do/get-certified/variance-request-interpretation-platform/>

2.16.14: It is difficult or impossible to compare antibiotic use from year to year. Number of treatments is easy but amount is not. Do you calculate active substance per kg fish produced or? You must remember that treatment dose (mg/kg fish/day) can vary from one antibiotic to another. What will you do if you have a farm that each year treat 3-4 times per year and then suddenly because of a hot summer must treat the fish 5 times? Will this farm lose their ASC label?

2.16.15: Ensuring residue levels below MRL-values is in EU normally taking place by following the withdrawal period that the Veterinarian according to 2.14.12 is obliged to set up. You could add: E.g. by following the minimum withdraw periods for the specific treatments.

2.16.16: We cannot support that findings of resistance shall be public. Many bacterias are naturally resistant to an antibiotic. What is the purpose of making this information's public? It will only confuse the public. Antibiotic resistance is difficult to understand for non-expert people.

2.17: Only "grow outs" need to go through a 3. Party audit. To avoid misunderstanding we need a very clear definition for "grow out" farms, and it has to be clear indicators are relevant in the other type of farms e.g. egg-production, fingerlings etc.

Princip 3:

The relevance for some of the indicators in principle 3 may be country specific.

Further the specific criteria for conducting a risk framework assessment should only be mandatory for farms with more than 5 employees for:

- 3.2.16, 3.2.17, 3.2.18:
- 3.3.9-3.3.11:
- 3.5.7-3.13.9:
- 3.13.7 – 3.13.9:

Definition:

Aquatic animal health professional: Skill person with a minimum of 5 years expertise could be a possibility.

[Redacted]

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To: [Redacted]
Cc: [Redacted]
Subject: [Redacted]

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[Redacted]

Thanks for sharing.

I looked over the Draft Standards in relation to acoustic deterrents and noticed it refers readers to a Marine Scotland document (<https://marine.gov.scot/data/use-acoustic-deterrent-devices-add-and-requirement-european-protected-species-licence-eps>). One of the attachments to this document mentions using the NMFS 120 dB RMS threshold for behavior for deterrents. Actually, the 120 dB threshold is for continuous sounds, like vibratory pile driving or drilling. For intermittent sounds, NMFS uses a 160 dB RMS threshold. Thus, if we did evaluate acoustic deterrents against a behavioral threshold, NMFS would use the 160 dB threshold, and not the 120 dB threshold. I know this is not your document but since you refer to it, I wanted to let you know.

Thanks,

[Redacted]



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ASC Farm Standard Submission

ASC Note: As part of our commitment to transparency, consultation feedback is made public and accessible on ASC's website. ASC will publish a list of who submitted feedback (name and affiliation only) but will not attribute individual comments. No personal data will link specific responses to respondents. However, comment fields will be published in full including any information you include. We will not publish or share your contact details with third parties.

***Mandatory Questions:**

Q. **By filling in this survey, I agree with my responses being made public. Your responses won't be attributed to your name or the name of your organization. If you choose NO, the survey will be terminated and you won't be able to complete this survey. **Yes***

Q. **Name:* [Redacted]

Q. **Organisation name:* [Redacted]

Q. **Type of affiliation:* [Redacted]

Criterion 2.17 - Hatcheries and Intermediate Sites – specific questions

Q. *ASC aims to address the impact of pre-Grow Out sites (e.g. hatcheries) using the same indicators as for Grow Out sites. Do you agree this aim is feasible?*

Answer options: **X strongly agree** – agree – neutral – disagree – strongly disagree + don't know / no opinion

Q. *Which option do you prefer to verify compliance of the pre-Grow Out sites?*

Option 1: on-site inspections of the pre-Grow Out sites by a qualified internal auditor from the Unit of Certification (UoC), using the ASC inspection template, reviewed by the Conformity Assessment Body (CAB) during the UoC audit with spot-checks as necessary by third-party auditors of intermediate sites in salmon production

Option 2: on-site audits by third party Conformity Assessment Body (CAB) auditors or by UoC auditors with equivalent qualifications

X Other - please specify: Third party Conformity Assessment Body (CAB) on-site. No Unit of Certification or internal auditors.

Q. This proposal separates production into “pre-growout” and “growout”, with the growout phase comprising the site of audit, or the Unit of Assessment (UoA). For finfish, the “pre-growout” phase will include any sites used prior to the harvest site (e.g. hatchery site, intermediate site or holding site). Shrimp will include any production units holding shrimp from PL25 onwards. Abalone and bivalve will include any sites from the point of translocation onwards.

Do you agree these definitions adequately cover the sites used and potential impacts as intended?

Answer options: strongly agree – **X agree** – neutral – disagree – strongly disagree + don't know / no opinion

Comment: We recommend broodstock sites be included in the “pre-growout” phase. Including broodstock sites, would change our answer to strongly agree.

Criterion 2.17 - Hatcheries and Intermediate Sites – general comments

General Comments:

We welcome ASC's proposal to require compliance with the Farm Standard from hatchery to harvest. However, we further believe that ASC should strengthen the proposal by requiring that verification of compliance for “pre-grow out” and “grow out” sites should be conducted only by accredited third-party auditors.

Re: Compliance requirements

- Requiring that all stages of the production cycle comply with the ASC Farm Standard's environmental and social criteria is a necessary and welcomed improvement.
- Ensuring the complete production cycle must comply with the ASC Farm Standard will help meet consumer expectations that the ASC label sustainability claim of “responsibly farmed” is applicable from egg to harvest – not just some of the cycle time.
- Full production cycle compliance with the standard will help to eliminate gaps where irresponsible practices could be currently missed and still sold under the ASC label.

Re: Verification requirements

- ASC should ensure the auditing process of “pre-grow out” sites is conducted independently with accredited third-party auditors.
- The proposal to have the final grow out site internally audit pre-grow out “suppliers” for compliance with the standard – including those suppliers that are the very same company as the final grow out – is a potential credibility risk for the ASC and its supporters as the auditing process lacks impartiality and independent oversight.
- ASC's lack of third-party auditing of pre-grow out farm sites could be seen as a program weakness in comparison to its main competitor, the Best Aquaculture Practices (BAP), who has

a stand-alone Finfish, Crustacean and Mollusk Hatcheries and Nurseries certification standard for pre-grow out sites that are audited by independent auditors.

- **ASC is a full member of ISEAL, which means supporters and consumers should be able to trust that ASC is meeting ISEAL's Credibility Principles and Codes of Good Practice. Requiring that third-party auditors conduct compliance against the ASC Farm Standard for the full production cycle, including pre-grow out sites, is aligned with ISEAL's Credibility Principle of Impartiality: "A credible sustainability system identifies and avoids or mitigates conflicts of interest throughout its governance and operations, particularly when it comes to assessing its users' performance".**

Thank you,

[Redacted signature block]

[Redacted signature block]

From: [REDACTED]
Date: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: [REDACTED]

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[REDACTED]

Sorry for taking time in getting back to you.

Thank you for sharing the ASC farm standards 2022 with us. I have reviewed section 2.16 Antibiotics and other Veterinary Therapeutants and the indicators within this section. My following comments refer to some few discrepancies found in those indicators for which [REDACTED] have recommendations:

Regarding not using antimicrobials prophylactically (indicator 2.16.4), or not using Critically Important Antimicrobials for Human Medicine by WHO unless there is no alternative treatment (indicator 2.16.12), the [REDACTED] position is that these conditions only apply for Fluoroquinolones, Cephalosporins and Colistin (which are in the group of Highest Priority within the Critically Important Antimicrobials for Human Medicine by WHO). For your reference, the *OIE List of Antimicrobial Agents of Veterinary Importance* include antimicrobials used for fish and general recommendations for antimicrobial used in all species <https://www.oie.int/app/uploads/2021/06/a-oie-list-antimicrobials-june2021.pdf> [REDACTED]

Regarding carrying out antimicrobial susceptibility testing (AST) prior to each treatment to guide the choice of antimicrobial (indicator 2.16.12), the [REDACTED] recommends that AST should be used as soon as possible to confirm the choice of treatment. For your reference a link to the Aquatic Animal Health Code (in particular refer to Chapter 6.2, article 6.2.7) https://www.oie.int/fileadmin/Home/eng/Health_standards/aahc/current/chapitre_antibio_resp_prudent_use.pdf

Clause 2.14 Fish Health and Welfare is out of the scope of my current activities. [REDACTED]

I hope this is helpful.

Best regards,

[REDACTED]

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H [Redacted]

Was thinking more about our conversation yesterday about working hours and having to have a rest day every 7 days. BC has an employment standards regulation specific to employees that work at fish farms. This is our guide to how we do our shifts. I have attached the employment standards factsheet which touches on the main points.

Thanks

[Redacted]

[Redacted]

[Redacted]

[REDACTED]

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To:
Cc:
Subject:

[REDACTED]

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Hello [REDACTED]

[REDACTED] was kind enough to present the non-native and escapes proposed changes to the ASC Standard. We are concerned about the inventory deviation metric of 1% over 9 years. We think that the 2%, the accuracy of our counting systems, would be more appropriate.

We pulled our deviations from 2013 forward (below) and you can see that, with the exception of Concepcion, 5 of the farms are between 1-2% for the 4-5 production cycles (8-10 years).

Let me know if you would like to discuss further or would like more information 😊

[REDACTED]

[REDACTED]

[REDACTED]

Hi [REDACTED]

I looked over ever year class from 2013 and it looks like the numbers are right, Concepcion had -10.61 in 2013 and then -9.93 in 2018 and then 2 years right around 0 so that's why it is -4.11

	General information				Harvest		
	Unit	Year class			Harvest		
Site: Ahlstrom		2015	2017	2019	2020	54	
Site: Atrevida		2014	2016	2018	2020	1,48	
Site: Concepcion		2013	2014	2016	2018	2020	1,79
Site: Culloden		2013	2015	2017	2019	2021	93
Site: Esperanza		2013	2015	2017	2019	2021	2,07
Site: Farm 13		2013, 2014, 2015, 2017, 2019, 2021				44	
Site: Gore		2016	2018	2020		1,49	
Site: Muchalat North		2013	2016	2018	2020	1,83	

Thanks

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PRINCIPLE 1: THE UOC OPERATES LEGALLY AND APPLIES EFFECTIVE BUSINESS MANAGEMENT

- CRITERION: 1.1 – LEGAL COMPLIANCE
- CRITERION: 1.2 – MANAGEMENT SYSTEM
- CRITERION: 1.3 – BUSINESS ETHICS
- CRITERION: 1.4 – TRACEABILITY AND TRANSPARENT DISCLOSURE

PRINCIPLE 2: THE UOC OPERATES IN AN ENVIRONMENTALLY RESPONSIBLE MANNER

- CRITERION 2.1 - THE UOC IS IN COMPLIANCE WITH APPLICABLE ENVIRONMENTAL REGULATIONS
- CRITERION 2.2 - ECOLOGICALLY IMPORTANT HABITATS
- CRITERION 2.3 - THE UOC MINIMIZES WILDLIFE INTERACTIONS
- CRITERION 2.4 - THE UOC AVOIDS THE CULTURE OF NEW NON-NATIVE SPECIES
- CRITERION 2.5 - ESCAPES
- CRITERION 2.6 – BENTHIC IMPACTS
- CRITERION 2.7 - WATER QUALITY
- CRITERION 2.8 - SALINISATION
- CRITERION 2.9 – BIOSOLIDS
- CRITERION 2.10 – FRESHWATER USE
- CRITERION 2.11 - ENERGY USE AND GREENHOUSE GAS EMISSIONS
- CRITERION 2.12 - MATERIAL USE, WASTE AND POLLUTION CONTROL
- CRITERION 2.13 - FEED
- CRITERION 2.14 – FISH HEALTH AND WELFARE
- CRITERION 2.15 - PARASITE AND PATHOGEN CONTROL
- CRITERION 2.16 - ANTIBIOTICS AND OTHER VETERINARY THERAPEUTANTS
- CRITERION 2.17 - HATCHERIES AND INTERMEDIATE SITES
- CRITERION: 2.18 - AREA BASED MANAGEMENT

PRINCIPLE 3 - THE UOC OPERATES IN A SOCIALLY RESPONSIBLE MANNER

- CRITERION: 3.1 – RIGHTS AWARENESS
- CRITERION: 3.2 – FORCED, BONDED, COMPULSORY LABOUR AND HUMAN TRAFFICKING
- CRITERION: 3.3 – CHILD LABOUR
- CRITERION: 3.4 – DISCRIMINATION
- CRITERION: 3.5 – HEALTH AND SAFETY
- CRITERION: 3.6 – COLLECTIVE BARGAINING AND FREEDOM OF ASSOCIATION
- CRITERION: 3.7 – TRANSPARENT CONTRACTS
- CRITERION: 3.8 – WAGES
- CRITERION: 3.9 – WORKING HOURS
- CRITERION: 3.10 – WORKPLACE CONDUCT RESPONSE
- CRITERION: 3.11 – EMPLOYEE ACCOMMODATION
- CRITERION: 3.12 – GRIEVANCE MECHANISM



CRITERION: 3.13 – COMMUNITY ENGAGEMENT

- I do not wish to provide feedback on specific criteria.

Per criteria we will ask:

1. What, if anything, would you like to see changed in this criterion? Select all answers that apply:

- a. Rationale

The rationale should summarise why the criterion and its associated impacts should be included in evaluation of responsible aquaculture practices.

- b. The intent statement

The Intent statement should communicate the desired state from the rationale.

- c. The scope definition(s) in this criterion (applicability to production systems/species)

- d. The appendices to this criterion

Please check the appendices in the full standard document.

- e. The indicators

- i. Please select all the indicators you would like to provide comments for. When possible, please include proposed new indicator language in your feedback.

- f. Nothing – I agree with this criterion and how it is phrased.

2. In this proposed standard we introduce a Risk Management Framework (RMF). This criterion includes a link with the RMF.

In effect, one of the following criteria:

P2: 2.2, 2.3, 2.4, 2.5, 2.8, 2.10,

P3: 3.2, 3.3, 3.5, 3.13

<p>The link with the Risk Management Framework in this criterion is clear. <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree</p> <p>Why or why not?*</p> <p><u>Comment box</u></p>	<p>Feasibility</p>	<p>Producers, CABs</p>	<p>Survey Workshop 1:1</p>
<p>It is clear how the farms comply with the Indicators concerning the Risk Management Framework. <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree</p> <p>Why or why not?*</p> <p><u>Comment box</u></p>	<p>Feasibility</p>	<p>Producers, CABs</p>	<p>Survey Workshop 1:1</p>



Criteria no.	PC Question	Q categori sation	Audience	Type of engagement
1.1	<p>The rationale for Criterion 1.1 states that all ASC certified farms are expected to comply with local and national laws and regulations. The intent is that farms comply with applicable laws and regulations and are in possession of all required legal licenses and permits.</p> <p>Is it necessary to specify what other laws and regulations are “applicable” to ASC certification, besides those covered by Indicators 1.1.1-1.1.3?</p> <p>a. No, it is not necessary to specify. It can be treated on a case-by-case basis.</p> <p>b. Yes, other types of applicable laws should be specified. Please select which below:</p> <ol style="list-style-type: none"> 1. Business, operations, and financial laws 2. Transparency and impartiality laws 3. Record-keeping and reporting laws 4. Food safety and public health laws 5. Animal welfare laws 6. Packaging, labelling and product-related laws 8. All laws are applicable 9. Other – please specify: 	Approval	General	Survey
1.3	<p>Indicator 1.3.1 The UoC shall prevent acts of corruption¹, extortion, embezzlement or bribery.</p> <p>What challenges do you envision for Small and Medium sized Enterprises to implement indicator 1.3.1? Comment box</p>	Feasibility	SME producers, Social NGOs	Workshop 1:1
1.3	<p>Indicator 1.3.1 The UoC shall (NOT, believe “not” this word is missing in this sentence) prevent acts of corruption², extortion, embezzlement or bribery.</p>	Information	General	Survey

¹ Corruption: See Definition List

² Corruption: See Definition List



	<p>Do you think Indicator 1.3.1 should be classified as a Critical Indicator, meaning that if any non-compliance is detected the farm is immediately suspended?</p> <p>Corruption et al., should never happen but the question is how can it be audited?</p> <p>Answer options: strongly agree – agree – neutral – disagree – strongly disagree</p>			
1.3	<p>Indicator 1.3.2 The UoC shall ensure that records are not falsified, or manipulated and information is not misrepresented.</p> <p>What challenges do you envision for Small and Medium sized Enterprises to implement indicator 1.3.2? Comment box</p>	Feasibility	SME producers, Social NGOs	Workshop 1:1
1.3	<p>Indicator 1.3.2 The UoC shall ensure that records are not falsified, or manipulated and information is not misrepresented.</p> <p>Do you think Indicator 1.3.2 should be classified as a Critical Indicator, meaning that if any non-compliance is detected the farm is immediately suspended?</p> <p>Answer options: strongly agree – agree – neutral – disagree – strongly disagree</p>	Information	General	Survey
1.4	<p><i>Which situation is preferable:</i></p> <p>(1) Farms must buy only ASC-compliant feed, which may be either segregated or mass balance. Farms and supply chain companies are required to identify and separate ‘fish fed ASC-compliant segregated feed’ from ‘fish fed ASC-compliant mass balance feed.’ This creates two types of ASC certified seafood which must always be kept separate using different claims, and has implications throughout the supply chain. Retailers and companies throughout the chain can exercise buying preferences for fish fed segregated feed.</p> <p>(2) Farms must buy only ASC-compliant feed, which may be either segregated or mass balance. Fish produced on compliant feed can be sold as ASC certified. All ASC certified fish is treated the same in the supply chain with equal claims (current situation). However, companies later in the chain beyond the farm cannot distinguish or prefer ASC fish fed segregated feed.</p> <p>Mass balance should be accepted and no differentiation between segregated and mass balance should be made; 1.4.3 c is unnecessary if mass balance is accepted; It is absolutely unnecessary to migrate to a segregated feed. To run duplicate product lines i.e. 100% compliant and partly compliant product would mean doubling up on the whole supply chain from feed producer to the farm and then, potentially doubling up all the silos on many farms too. That will hugely impact</p>	Approval / Information	Producers, CABs, Retail/Brands	Workshop 1:1



<p>integrated logistic system that currently has the flexibility to deliver any product / lot or combination of lots, to any farm, in any order and thereby minimise both cost and the environmental impact of transport. Additionally, maintaining segregated feed at the point of manufacture and during pre-transport waiting will massively impact operation at the most basic level i.e. planning and scheduling. All that, with no payback in terms of product cost or feed + fish performance expectations. .</p>			
<p>(3) Another situation would be preferable – please describe.</p>			

Criteria no.	PC Question	Q categorisation	Audience	Type of engagement
2.2	<p>Indicator 2.2.3 (and related): Apart from PAs (protected areas), HCVAs (high conservation value areas), and mangrove ecosystems, the indicators also address sensitive and critical habitats and natural wetlands. In the context of this criterion the following scopes apply: Sensitive habitats – In addition to those not captured by other habitat definitions, specifically include coral reefs and seagrass beds Critical habitats - habitats on which threatened and protected species depend Natural wetlands - marsh, fen, peatland, intertidal zone, estuaries, marine water shallower than six metres at low tide; permanent or temporary, with water that is static or flowing, fresh, brackish, or marine.</p> <p>Does this list include all types of habitats to be addressed? Yes/No If no, please specify:</p>	Information	NGOs, Academia	Survey Workshop, 1:1
2.2	<p>In the context of this criterion the following scopes apply: Sensitive habitats - In addition to those not captured by other habitat definitions, specifically include coral reefs and seagrass beds Critical habitats - habitats on which threatened and protected species depend Natural wetlands - marsh, fen, peatland, intertidal zone, estuaries, marine water shallower than six metres at low tide; permanent or temporary, with water that is static or flowing, fresh, brackish, or marine.</p> <p>ASC certified farms assess their impact on protected areas and areas with high biodiversity value, including mangroves. Do you agree that ASC certified farms should also assess the impact of their siting on other sensitive and critical habitats? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. Free comment-box. Free comments can only be given if a ranking has been selected prior.</p>	Approval	General	Survey, Workshop-Survey



Criterion no.	PC Question	Q categorisation	Audience	Type of engagement
2.2	Do you support a “site-specific” approach to determine necessary ecological buffer-width in relationship to relevant habitats (e.g., riparian buffers, protected areas, sensitive/critical habitats) and ecological functions to be protected. ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. Free comment-box. Free comments can only be given if a ranking has been selected prior.	Approval	General	Survey, Workshop-Survey
2.2	ASC recognises that certain small scale aquaculture operations may have only had access to farm land after 1999. Should ASC consider a requirement that permits farm siting in mangroves after 1999, but only with the requirement that the farm must restore the same area (at least 100% of lost surface area) with same ecological functions? Yes / No / No opinion Free comment-box will be made available as well. Free comments can only be given if an answer has been selected prior.	Information	Environmental NGOs, Small & large farms Retail/brands Academia / Research Government /regulator CAB / Auditor	Survey, Workshop, 1:1

2.3	Indicator 2.3.2 The UoC shall not intentionally or unintentionally kill mammals, elasmobranchs, birds, or reptiles (excluding vermin), unless for situations ³ where injured animals are unlikely to recover, situations evidently threatening human safety, or where legal requirements mandate euthanasiation. Vermin: Vermin are pests or nuisance animals that spread diseases, harm or prey upon production species. The term is defined in relation to human activities, and therefore species may vary by region and in time. In the context of the ASC standard, threatened and protected species cannot be classified as	Approval	Academia/Research CABS; Farm (Producers) Government /Regulator; Intergovernmental	Survey, Workshop, 1:1 Sessions
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³ Exceptions are limited to occasional mortality incidents, rather than systemic incidents, and as long as the incident does not affect the favourable population status. As an example, a written statement by a veterinarian or the responsible authorities may confirm animals were unlikely to recover or the situation evidently threatened human safety, and a written statement by authorities may confirm legal requirements to euthanise. In all cases, a written statement shall be available confirming that a) injured animals were unlikely to recover, b) animals evidently threatening human safety, or c) legal requirements mandated euthanasiation by a senior manager above the farm manager, which can be issued during or after the incident.



	<p>vermin. A species may be listed as vermin by authorities, refer to listings, such as Wildlife Acts, wherever available.</p> <p>Do you agree with the proposed Indicator 2.3.2 to not allow any mortalities of mammals, elasmobranchs (sharks), birds or reptiles, unless any of the listed conditions apply? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. Free comment-box will be made available as well. Free comments can only be given if a ranking has been selected prior.</p>		<p>Organisations; IT solutions companies; NGOs</p>	
2.3	<p>Do you agree with Indicator 2.3.3 to not allow the use of acoustic deterrent devices unless the farm can demonstrate that its use does not disturb cetaceans? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. Free comment-box will be made available as well. Free comments can only be given if a ranking has been selected prior.</p>	Approval	<p>Academia/Research CABs; Farm (Producers) Government/Regulator; Intergovernmental Organisations; IT solutions companies; NGOs</p>	<p>Survey, Workshop-Survey; 1:1 sessions</p>
2.3	<p>ASC recognizes that even where effective mitigation measures are implemented, occasional unintentional bird mortalities will occur. Should ASC remove birds as a specified species group in indicator 2.3.2 and consider an allowable metric limit for birds?</p> <p>For farmed salmon we should keep the same limit as what is currently applied.</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. Free comment-box will be made available as well. Free comments can only be given if a ranking has been selected prior.</p>	Information	<p>Academia/Research CABs; Farm (Producers) Government/Regulator; Intergovernmental Organisations; NGOs</p>	<p>Survey, Workshop, 1:1</p>



2.4	<p>2.4.1 The UoC shall only stock⁴ a non-native species if at least one of the below conditions is met: 1) the species has existed in established wild population(s) in the culture area since 2010⁵; 2) the species has been widely commercially produced⁶ in the culture area before 2010; 3) the stock is to a high degree sterile⁷ or otherwise unable to establish wild populations; 4) the species is cultured in fully-closed recirculating aquaculture systems⁸.</p> <p>Should there be any other conditions where ASC should allow the culture of non-native species? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. + don't know / no opinion If you agree / strongly agree, please indicate which condition(s):*</p>	Information	Farms; NGOs; Academia / Research; Government /regulator; Intergovern mental organisation ; CAB / Auditor	Survey, Workshop- Discussion
2.4	<p>Fully-closed recirculating aquaculture systems: this means the system is land-based and prevents escapes from each stage in the production process, including for example eggs, larvae and alevins, in addition to adult fish. Fully closed means there is no direct pathway to the environment. Animal production must take place inside buildings built to withstand severe local weather conditions (e.g., tropical storms, flooding), and all effluents pass through multi-stage treatment systems including mechanical filtration prior to release.</p> <p>Do you agree with the definition above? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*</p>	informat ion	Farms; NGOs; Academia / Research; Government /regulator; Intergovern mental organisation ; CAB / Auditor	Survey, Workshop- Discussion
2.4	<p>2.4.1 The UoC shall only stock⁹ a non-native species if at least one of the below conditions is met: 1) the species has existed in established wild population(s) in the culture area since 2010¹⁰; 2) the species has been widely commercially produced¹¹ in the culture area before 2010; 3) the stock is to a high degree sterile¹² or otherwise unable to establish wild populations;</p>	Approv al & informat ion	Farms; NGOs; Academia / Research;	Survey, Workshop-Survey

⁴ This includes species stocked together with the culture fish for purposes such as parasite control.

⁵ The date (2010) refers to the year of release of the first ASC Standard.

⁶ Widely commercially produced: see Definition list

⁷ A high degree of sterility is achieved by:1) >98% triploidy monosex, 2) germ-cell migration disruption and 3) gene editing (CRISPR).

⁸ Fully closed RAS: see Definition List

⁹ This includes species stocked together with the culture fish for purposes such as parasite control.

¹⁰ The date (2010) refers to the year of release of the first ASC Standard.

¹¹ Widely commercially produced: see Definition list

¹² A high degree of sterility is achieved by:1) >98% triploidy monosex, 2) germ-cell migration disruption and 3) gene editing (CRISPR).



	<p>4) the species is cultured in fully-closed recirculating aquaculture systems¹³.</p> <p>Current indicators do not address the special situation where non-native species have already become established or have been commercially farmed prior to 2010. However, continued farming of these non-native species in certain areas may have a remaining high potential to cause continued/new harm:</p> <p>Should ASC add an indicator, requiring that non-native <u>invasive</u> species are only permitted under option 3) or 4) in indicator 2.4.1?</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree, + don't know / no opinion</p> <p>If you agree / strongly agree , what source(s) should be used to classify/define “invasive species”?</p> <p>And</p> <p>What source(s) should be used to classify/define “known to harm”?</p> <p>Options 1 and 2 should remain. Non-native species can be farmed in a responsible way without needed sterile or fully grown in RAS systems.</p>		<p>Government /regulator; Intergovernmental organisation ; CAB / Auditor</p>	
2.4	<p>2.4.1 The UoC shall only stock¹⁴ a non-native species if at least one of the below conditions is met:</p> <p>1) the species has existed in established wild population(s) in the culture area since 2010¹⁵;</p> <p>2) the species has been widely commercially produced¹⁶ in the culture area before 2010;</p> <p>3) the stock is to a high degree sterile¹⁷ or otherwise unable to establish wild populations;</p> <p>4) the species is cultured in fully-closed recirculating aquaculture systems¹⁸.</p> <p>Should ASC add a separate indicator with more limited conditions for non-native species which can sexually mature during grow-out?</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree, + don't know / no opinion</p> <p>If you agree / strongly agree, which of the conditions 1) to 4) above should apply? (1-4; don't know / no opinion)</p>	Approval & information	<p>Farms; NGOs; Academia / Research; Government /regulator; Intergovernmental organisation ; CAB / Auditor</p>	Survey, Workshop-Survey

¹³ Fully closed RAS: see Definition List

¹⁴ This includes species stocked together with the culture fish for purposes such as parasite control.

¹⁵ The date (2010) refers to the year of release of the first ASC Standard.

¹⁶ Widely commercially produced: see Definition list

¹⁷ A high degree of sterility is achieved by:1) >98% triploidy monosex, 2) germ-cell migration disruption and 3) gene editing (CRISPR).

¹⁸ Fully closed RAS: see Definition List



	No need to add a separate indicator.			
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2.5	<p>Across the aquaculture industry, practices differ regarding fish counting. Whereas counting, and its associated technique, is advanced in the salmon industry, this might not be comparable in other cultured species (e.g. seabass, seabream, tropical finfish species, seriola/cobia).</p> <p>In addition, the impact of escaped salmon on their wild counterpart population is proven, whereas this is less tangible for other species.</p> <p>Within this context, should ASC set more strict escape limits for specifically salmon, or, set consistent escape limits for all cage-culture species equally?</p> <p>ANSWER OPTIONS (two options to choose from) + don't know / no opinion: ASC should set stricter limits for salmon only</p> <p>ASC should set consistent escape limits for all cage-culture species equally</p> <p>There is much more knowledge for salmon than for other species – this should not lead to stricter limits for salmon only, the principle should be the same for all species.</p> <p>+ open comment box</p>	Approval & Information	General	Survey, Workshop, 1:1, Pilots
2.5	<p>Unaccounted losses are defined as the total harvest number minus stocked number, known mortalities, and known escapes.</p> <p>Do you agree that not more than 4% of unaccounted fish loss should be permitted per production cycle (4%/cycle)?</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree.</p> <p>Free comment-box. Free comments can only be given if a ranking has been selected prior.</p>	Approval	General	Survey, Workshop
2.5	<p>Unaccounted losses are defined as the total harvest number minus stocked number, known mortalities, and known escapes.</p> <p>Do you agree that the percentage of unaccounted loss has to be reduced over time as a demonstration of improvement?</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree.</p> <p>Free comment-box. Free comments can only be given if a ranking has been selected prior.</p>	Approval	General	Survey, Workshop
2.5	<p>How should ASC handle the topic of escapes for culture systems such as ponds in areas of chronic flooding?</p>	Information	Farms, CABs,	Workshop 1:1



			Academics, Governments	
2.5	<p>Do you agree it is realistic to expect all culture systems other than cages to have no mass escape events and no chronic leakage?</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*</p>	Information	Farms, CABs, Academics	Survey
2.5	<p><i>2.5.2 Indicator scope: finfish only</i> The UoC shall reduce¹⁹ the number of unaccounted loss over time, by reducing the number of escapes and increasing counting accuracy, so that actual harvest counts result in a maximum of 1% unaccounted stock calculated over a 9-year period.</p> <p>Do you agree with this 1% unaccounted stock criterion calculated over a 9-year period? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree If you disagree / strongly disagree, please indicate why and what you think the percentage should be:*</p> <p>No technology able to count 1% accurate per today and difficult to predict if 9 years time this will be possible.</p>	Information	Finfish farms, Finfish CABs, Environmental NGOs, Academics	Survey

2.6	<p>2.6.2 The UoC shall ensure an acceptable Ecological Quality Status (EQS) of the area surrounding the farm as outlined in Appendix I (Table 2).</p> <p>Do you agree with the following statement: “The EQS categories are applicable to all benthic habitats suitable for marine aquaculture”? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why and what you think the percentage should be:*</p>	Approval	Academia Regulators Farms with marine cages or suspended mollusc systems	Survey Pilots
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¹⁹ A mass mortality event in the previous year/cycle does not count towards improvement in the next year/cycle, as required in this indicator.



	<p>National benthic monitoring systems, developed together with science (the case for example of MOM systems in Norway and Faroes, Irish benthic monitoring and SEPA monitoring in Scotland) should be accepted by ASC) . Unclear why in the EQS table there is a requirement for both redox and sulphide – should be either one OR the other. It can be very challenging to measure sulphides reliably on a boat at sea.</p>			
2.6	<p>2.6.2 The UoC shall ensure an acceptable Ecological Quality Status (EQS) of the area surrounding the farm as outlined in Appendix I (Table 2).</p> <p>Do the limits set for the various abiotic and biotic measures in Table 2 of Appendix I reflect the goal to minimise, mitigate or eliminate negative benthic habitat, biodiversity and ecosystem effects from seabed organic enrichment? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree If you disagree / strongly disagree, please indicate why:*</p> <p>See comment above & in some situations one sampling station may fail to be within the EQS limits while the overall assessment indicate no impact. Important to take a holistic evaluation of impact (the holistic evaluation being done by an independent third party) and do not lead to NC just because of one sampling stations failing.</p>	Approval	Environmental NGOs Academia Farms with marine cages or suspended mollusc systems	Survey Workshop
2.6	<p>See Appendix I, Section 1.4 - Timing of sampling Do you have any information or scientific references that ASC can review to support or refine the proposed timing for sampling?</p>	Information	Academia Farms with marine cages or suspended mollusc systems	Survey
2.6	<p>See Appendix I, Section 1.5 - Tiered Sampling Approach Do you agree the number of samples for Tier 1 and Tier 2 are practical? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*</p>	Feasibility	Farms with marine cages or suspended mollusc systems	Survey
2.6	<p>Appendix I, Section 1.5 - Tiered Sampling Approach - A. Sampling Protocol – Marine Cage Systems The distances from the holding structures for the EQS monitoring zones are set at 30, 100, 150 and 500 metres. Do you agree these accurately reflect the spatial distribution of organic waste from the farm? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*</p>	Approval	Environmental NGOs Academia Marine cage farms	Survey Workshop

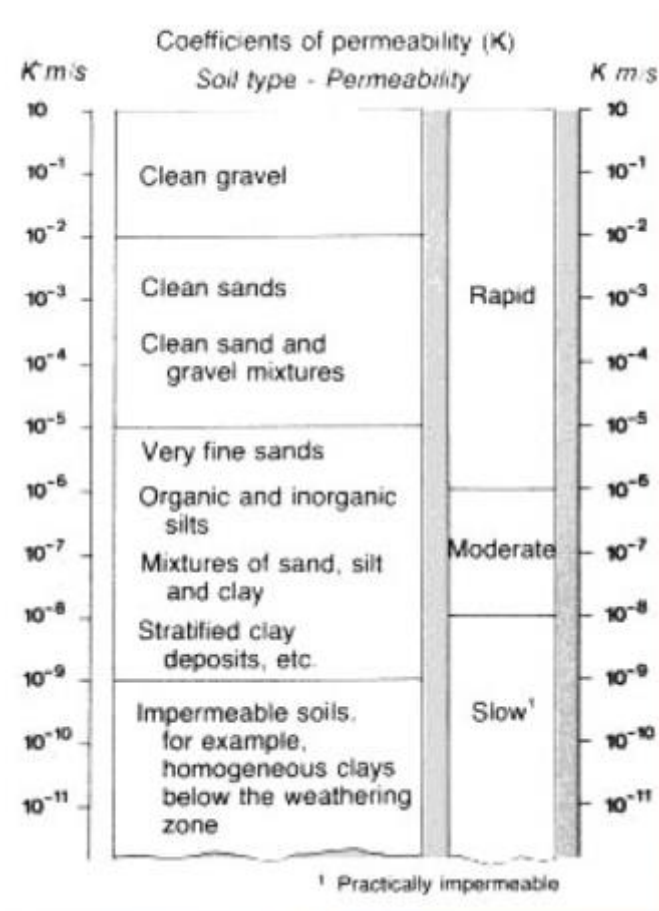


	<p>This may vary from site to site, from benthic model to benthic model – important ASC accepts the national monitoring systems which have been validated for the local realities.</p>			
2.6	<p>Appendix I, Section 1.5 - Tiered Sampling Approach - A. Sampling Protocol – Suspended Marine Mollusc Systems. The distances for the EQS monitoring zones are set at 0 to 30 m inside the farm boundary and 10 to 30 m outside the farm boundary. Do you agree these accurately reflect the spatial distribution of organic waste from the farm? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:* This may vary from site to site, from benthic model to benthic model – important ASC accepts the national monitoring systems which have been validated for the local realities</p> <p><i>Page 39: Sampling at 10-meters intervals do not make any sense; page 43: Why is the classification stricter than international systems ?; Table 3/page 44: meters-/intervals are not related to the real world + understanding of currents and the complexity of its nature, is not reflected in the outlined sampling-protocol; When peak biomasses occur, the standard says temperature decides when to sample: not clear the reason for this and it does not follow the reasoning used by national regulators. Figure 1/page 47: benthic footprint is different in the real world + Reference-station is proposed localised at 500 meters which would be equal to C2-station in the MOMC-system; . 500 meter will probably not reflect a ref-condition (this can vary case by case and therefore the importance of relying on the existing national benthic monitoring schemes).</i></p>	Approval	Environmental NGOs Academia Farms with suspended mollusc systems	Survey Workshop
2.6	<p>See Appendix I, Section 1.6 - User-defined monitoring program. Do you agree the requirements for the user-defined specific benthic monitoring program are clear and auditable? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*</p>	Information	CABs Farms with marine cages or suspended mollusc systems	Survey 1:1 Workshop Pilots
2.6	<p>See Appendix I, Section 1.7 - Standard Operating Procedures for the Field Analysis of Abiotic Indicators Employed in Tier 1 and Tier 2. Do you perceive any potential challenges with the use of the Sulfide UV methodology? Yes / No If Yes, please explain:*</p> <p>Practical experience with trying to measure sulphide on a boat is extremely challenging if weather conditions are difficult.</p>	Feasibility	Academia Regulators Farms with marine cages or suspended mollusc systems	Survey Pilots



2.6	<p>The Benthic Technical Working Group is recommending an approach similar to the one followed by the proposal for marine systems for freshwater systems that discharge into lakes and reservoirs. The approach incorporates:</p> <ul style="list-style-type: none"> • A tiered sampling and EQS classification; • Direct benthic monitoring; • The use of biotic and abiotic indicators. <p>Do you have any information or scientific references that ASC can review to further develop the approach for freshwater systems that discharge into lakes and reservoirs?</p> <p>If national regulatory monitoring systems exist, they should be accepted by ASC.</p>	Information	Academia Farms excluding marine cages or suspended mollusc systems	Survey
2.7	<p>See the blue box for criterion 2.7.</p> <p>Do you have any information or scientific references that ASC can review to further develop the recommendations for systems that discharge into lakes and reservoirs?</p>	Information	Academia; Government /Regulators; Environmental NGOs; Farms that operate in lakes and reservoirs	Survey 1:1
2.7	<p>Concerning the 'Proposal for a simple tool for assessing farm impacts on water quality':</p> <p>Do you have any information or scientific references that ASC can review to further develop the proposed tool?</p> <p>The previous requirements related with water quality for salmon farming would be sufficient.</p>	Information	Academia; Government /Regulators; Environmental NGOs; Farms that operate in lakes and reservoirs	Survey
2.8	<p>Do you agree with ASC defining highly permeable soil as having a K coefficient of 10^{-1} m/s - 10^{-8} m/s?</p> <p>ANSWER OPTIONS: Yes/No. + don't know / no opinion</p>	Approval	Environmental NGOs, academics,	Survey Workshop

If no, "Please explain why:"*



producers,
government
s, CAB

2.8

What methodology should ASC recommend in guidance for producers to determine soil permeability (cost effective, ease of use)

Information

Environmental NGOs,
academics,
producers,
government
s, CAB

Workshop



2.8	<p>Do you agree that producers should be allowed to not use liners in naturally saline environments regardless of the permeability of the soil?</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*</p>	Approval	Environmental NGOs, academics, producers, governments	Workshop Survey
2.8	<p>To reduce plastic waste ASC would like to prohibit the use of plastic liners. Do you agree that this is feasible?</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*</p>	Feasibility	Environmental NGOs, academics, producers, governments	Survey Pilots Workshop
2.8	<p>ASC would like to propose prohibiting the discharge of effluents over land since this can contribute to salinisation. Do you agree with this proposal?</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. If you disagree / strongly disagree, please indicate why:*</p>	Approval	Environmental NGOs, academics, producers, governments	Workshop Survey
2.9	<p>2.9.1 The UoC shall carry out an assessment, to identify and document the following:</p> <ul style="list-style-type: none"> • locations where biosolids accumulate and are removed • potential contamination of biosolids through salinity, disease, drug residues, residues of other hazardous waste¹ • when feeding is used: estimate concentration of key nutrients (Nitrogen, Phosphorus) • options for on-site containment of biosolids • anticipation of recurring extreme weather events which could impact on on-site containment measures • evaluate possibilities to prioritise re-use over disposal • any needs to dispose of biosolids off site <p>Do you agree that it is feasible for the UoC to estimate the key nutrient concentration (Nitrogen, Phosphorus) in the biosolids?</p>	Feasibility	Farms CABs	Survey Pilots



	ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you agree / strongly agree, please indicate why:*			
2.9	2.9.2 When biosolids are re-used ²⁰ , the UoC shall only re-use uncontaminated biosolids (see 2.9.1), and only for the following purposes: <ul style="list-style-type: none"> • use as fertilizers in agriculture • maintenance and building of dykes • maintenance of roads or infrastructure • biogas Please provide any other responsible re-uses of uncontaminated biosolids which you think should be added to the list:	Info	Farm Academics	Survey
2.9	What methods do you use for responsible re-use of your biosolids?	Info	Farm	Survey
2.9	Please provide any information/data/research you may possess on potential risks associated with antibiotic resistances building up due to re-use of biosolids	Info	Academics	Workshop, Survey
2.9	Do you know of an easy way producers can estimate key nutrients (Nitrogen and Phosphorus)?	Info	Academics	Workshop
2.9	Does ASC need to add other key nutrients (in addition to Nitrogen and Phosphorus)? Yes/No + don't know / no opinion If yes, please specify which nutrients you believe should be added:*	Info	Academics	Survey Workshop

2.10	<ol style="list-style-type: none"> 1. Does your production system require the addition of salt? (Y/N) 2. What is the annual/monthly/daily? change in salinity? (add scale options) 3. Do you utilize desalination systems prior to discharge? (Y/N) 	Info	Producers	Pilots
2.10	Do you agree it is feasible for producers to get minimum vital flow information for their water source? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion.	Feasibility / Info	Producers, Government s, CABs, Environment	Survey

²⁰ this applies when biosolids are removed from e.g., culture systems, canals, treatment systems.



	If you disagree / strongly disagree, what information would producers be able to provide that show they use water responsibly?*		al NGOs, Academics	
2.10	How often do measurements need to be conducted to determine that water is used responsibly (e.g., weekly, monthly, quarterly, annually)? Comment box + don't know / no opinion.	Information	Governments, Academics	Survey
2.10	Do you think there is value in mapping all users of water in an area to determine relative use by the UoC? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree If you agree / strongly agree, please indicate why:*	Agreement	Governments, Environmental NGOs, Academics	Workshop
	Not sure if this indicator or the indicators above are applicable to farmed salmon. Important not to turn these metrics into an overkill. There are licenses in place related with water use and discharge for every freshwater site and as long as the licenses are in place this should be sufficient to cover these elements (principle 1 will already verify this).			
2.10	Do you agree that measures to reduce water use and water wastage are necessary in areas where water is abundant? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree	Information	General	Survey
	Reduction of freshwater use is material in areas of water scarcity. Applying water reduction in areas where water is abundant will make this process an overkill – adding complexity and cost without a clear sustainability value.			
2.11	Are there particular barriers to gathering information on the types and volumes of energy used (e.g. litres of gasoline or kJ of electrical energy purchased from a supplier), for producers that have not previously needed to calculate and report energy use and/or GHG emissions? Yes/No + don't know / no opinion If Yes, please specify which barriers:*	Info Feasibility	Farms, CABs	Survey Workshop 1:1



	<p><u>There may be practical challenges related with invoices coming latter in the year and energy use being overestimated as the same suppliers (e.g smolt supplier) sells their smolts to different customers so how to provide each customer a fair share of energy use maybe complicated.</u></p>			
2.11	<p>2.11.2 The UoC shall annually calculate the quantity of GHG emissions produced, in kg CO₂-eq per tonne of farm-gate production, following the method outlined in Annex 2, including total emissions and emissions from each of: a) on-farm energy consumption, b) feed, and c) on-farm consumption of other inputs.</p> <p>Are there particular sources of GHG emissions relevant to aquaculture production that the combined considerations outlined above fail to address?(please note that land use change is covered elsewhere in the Farm and Feed Standards)</p> <p>ANSWER OPTIONS: Yes/No + don't know / no opinion If yes: please list those that you believe should be incorporated into the criterion's calculation and reporting requirements</p> <p><u>Important to realize that there are primary data for GHG emissions (for feed raw materials) that can differ from what is available in databases and may have a significant impact on the final calculations. Can primary data be used in the ASC calculations?</u></p>	Info and agreement	NGOs, Academia	Survey Workshop 1:1
2.11	<p>2.11.3</p> <p>a) The UoC shall, where 2.11.1 and 2.11.2 indicate energy related values higher than the thresholds below in i. and ii., develop and implement an Energy Efficiency Management Plan (EEMP), including the improvement measures in b), c) and d):</p> <p>i. 1,300 MJ/t energy consumed per tonne of, farm-gate production, and</p> <p>ii. 100 kg CO₂-eq per tonne of farm-gate production from on-farm energy use.</p> <p>b) The UoC shall, as part of the EEMP, outline provisions to improve the efficiency of farm-gate production per unit of energy used and GHG emissions produced, in order to work towards 2.11.3 a).</p> <p>c) The UoC shall, as part of the EEMP, outline provisions to reduce the use of energy from non-renewable sources, in order to work towards 2.11.3 a).</p> <p>d) The UoC shall, as part of the EEMP, outline provisions to derive an increased proportion of energy from non-fossil fuel sources, in order to work towards 2.11.3 a).</p>	Agreement Information	General	Survey Workshop 1:1



	<ul style="list-style-type: none"> Are there particular items or requirements that should be included to maximise the effectiveness of an EEMP? <p>ANSWER OPTIONS: Yes/No + don't know / no opinion If yes: please list those that you believe should be included</p> <p>Unclear where this threshold comes from and if it is robust enough to be used as a global benchmark. Several studies such as the Blue Food Assessment show chicken farming having a higher GHG emissions / edible portion as compared to farmed salmon.</p> <p>C and D are overlapping. What if the energy consumption is above the suggested threshold but not the GHG emissions? This can be a reality as a farm (if connected to land power) may be purchasing renewable electricity which should reduce significantly the market based GHG emissions while still having a high energy use.</p>			
2.11	<p>2.11.3 a) The UoC shall, where 2.11.1 and 2.11.2 indicate energy related values higher than the thresholds below in i. and ii., develop and implement an Energy Efficiency Management Plan (EEMP), including the improvement measures in b), c) and d):</p> <ul style="list-style-type: none"> i. 1,300 MJ/t energy consumed per tonne of ²¹, farm-gate production, and ii. 100 kg CO₂-eq per tonne of ²², farm-gate production from on-farm energy use. <p>2. Do you have suggestions for another basis for calculating energy performance that would be more adequate and/or more effective?</p> <p>ANSWER OPTIONS: Yes/No If yes: please provide your suggestions</p>	Feasibility	General CABs Scientists	Pilot Survey
2.12	What challenges, if any, do you expect to encounter when implementing the requirement of tagging or marking aquaculture gear? Please explain:	Feasibility	Farms	Pilots Workshops

²¹ Threshold for energy use is based on the median on-farm energy consumption per kg of live weight chicken as reported in 8 published life cycle assessments of conventional chicken production.

²² GHG threshold represents the equivalent quantity of energy multiplied by a direct GHG intensity factor for diesel (0.074 kg CO₂-eq/MJ).



	Unrealistic to think that for example ropes can be tagged. Important to have a policy on responsible plastic use but tagging all farming equipment is unrealistic. Where tagging is available (pens for example) this should be ok.			
2.12	What challenges, if any, do you expect to encounter when implementing the use of plastic retention devices at the effluent or farms discharge point? Please explain. What is an effluent or farms discharge point under seawater pen farming? This may lead to unnecessary increase in costs. If a farm has a policy in place and a goof plastic management system in place, there should be no need to force the use of plastic retention devices.	Feasibility	Farms	Pilots Workshops
2.12	Is it reasonable to require that farms contain hazardous materials to the extent that there would be no runoff during extreme weather events?	Feasibility	Farms	Pilots Workshops
2.12	2.12.5 The UoC shall hold effluents for at least 48h, or as per product specification (whichever is greater), after culture animals have been treated with hormones. Do you agree a 48-hour wait is the most appropriate process to ensure sufficient breakdown of active ingredients to avoid significant negative impact? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree: What other parameters or processes should be included?*	Info/Approval	Farms / Academia	Pilots Workshops Survey
2.12	2.12.6: The UoC shall only use net cleaning facilities which treat effluents, if nets are cleaned on land; effluent treatment includes the capturing of copper if copper treated nets are used. Should any biocides other than copper be included? ANSWER OPTIONS: Yes/No + don't know / no opinion If yes: please list those that you believe should be included	Info/Approval	Farms / Academia	Survey Pilots Workshops 1:1
2.12	2.12.8: The UoC shall not treat nets / other aquaculture gear / infrastructure with copper, or clean ²³ copper-treated nets ²⁴ / other aquaculture gear / infrastructure, in situ in the environment.	Feasibility	Farms / Academia	Pilots Workshops

²³ Light cleaning of nets is allowed. Intent of the standard is that, for example, the high-pressure underwater washers could not be used on copper treated nets because of the risk of copper flaking off during this type of heavy or more thorough cleaning.

²⁴ Under the SAD, "copper-treated net" is defined as a net that has been treated with any copper-containing substance (such as a copper-based antifoulant) during the previous 18 months, or has not undergone thorough cleaning at a land-based facility since the last treatment. Farms that use nets that have, at some point prior in their

	<p>Are there any situations in which it is not feasible to comply with this indicator? (e.g. spraying of infrastructure in cage structures/platforms) ANSWER OPTIONS: Yes/No + don't know / no opinion If yes: please list those situations Unclear if cleaning of non-copper equipment in situ is included in this indicator. If it is not copper-painted it should not apply.</p>		CABs	1:1
2.12	<p>2.12.19 The UoC shall not use single use plastics (SUPs)²⁵, unless sustainable alternatives are not available or affordable²⁶. Does the requirement that restricts the use of single use plastics impose a challenge according to your own circumstances. Please explain. Difficult to audit. Listing all SUP may be an unnecessary task (with consequences on cost) if a good plastic management policy and management system is in place to minimize the loss of plastics into the environment. How would ASC define a sustainable alternative? There are so many ways to run LCA of alternative packaging and even if this is done, other elements often not considered in LCA need to be considered such as food safety.</p>	Feasibility	Farms	Survey; Pilots; Workshops
2.12	<p>2.12.20: The UoC shall install, control and record plastic retention devices at the effluent or discharge point, to prevent contributing to marine litter. What kind of plastic retention devices do you know that succeed in preventing marine litter? Unrealistic and unnecessary if a policy and good waste management system are in place.</p>	Information	Farms / Academia	Workshops Pilots Survey 1:1
2.12	<p>2.12.22: The UoC shall dispose of waste²⁷ responsibly, by using one of the following methods: i. Non-hazardous waste - disposal by incineration²⁸ (with energy recovery) - disposal by incineration (without energy recovery)</p>	Information	Farms Academia CABs	Survey Workshop Pilot 1:1

lifespan, been treated with copper may still consider nets as untreated so long as sufficient time and cleaning has elapsed as in this definition. This will allow farms to move away from use of copper without immediately having to purchase all new nets.

²⁵ This shall include cotton bud sticks, cutlery, plates, straws, stirrers, and sticks for balloons, and should include cups, food and beverage containers made of expanded polystyrene, and on all products made of oxo-degradable plastic.

²⁶ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32019L0904&from=EN>

²⁷ Including biosolids, daily mortality removals and mass mortalities

²⁸ Incineration: see Definition List.



	<ul style="list-style-type: none"> - disposal by landfilling²⁹ ii. Chemical and hazardous waste <ul style="list-style-type: none"> - disposal of chemical and hazardous waste by professional contractor, after treatment³⁰ and using the methods listed above <p>What other means of disposing, apart from disposal by incineration and disposal by landfilling would you consider responsible and why?</p>		Environmental NGOs	
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2.13	<p>How many feed suppliers do you source from? From those, how many produce feed which meets current ASC farm standard requirements?</p>	Info	Certified Farms	Survey Workshop 1:1 Pilots
2.13	<p>How likely do you think it is that some farms may not be able to purchase ASC Feed as per the new Feed Standard? Link Feed Standard to: https://www.asc-aqua.org/what-we-do/our-standards/feed-standard/ ANSWER OPTIONS: very likely – likely – neither likely nor unlikely – unlikely – very unlikely + don't know / no opinion.</p>	Info	Farms and feedmills	Survey Workshop 1:1 Pilots
2.13	<p>Indicator 2.13.2: The UoC shall only feed seaweed as a direct feed source which has been wild harvested from a regulated, well-managed resource or farmed under an ASC recognised certification scheme.</p> <p>How likely do you think it is that some farms may not be able to source seaweed which meets this requirement?</p> <p>ANSWER OPTIONS: very likely – likely – neither likely nor unlikely – unlikely – very unlikely + don't know / no opinion.</p> <p>Believe this is not applicable to farmed salmon – seaweed is not a good feed raw materials to be feed directly to salmon – it will have negative impacts on fish performance, health and welfare.</p>	Info	Academia/Research CAB Environmental NGO Farm (Producer) Feed mill	Survey

²⁹ Landfilling: see Definition List.

³⁰ Chemical and Hazardous waste may need prior/additional treatment, see 2.12.2 and 2.12.8.



2.13	<p>2.13.6 The UoC shall not feed wet feedstuffs³¹ or moist pellets³², nor uncooked or unprocessed fish³³ to ASC certified production.</p> <p>Are you aware of any species which rely on feeding wet feedstuffs or moist pellets (2.13.6)? Yes / No + don't know / no opinion</p>	Info	Farms and feedmills, academics, environmental NGOs, CABs	Survey
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2.14	<p><i>Indicator scope: finfish only</i></p> <p>Indicator 2.14.1: The UoC shall vaccinate finfish for all regionally-relevant diseases for which an effective vaccine exists.</p> <p>It is feasible to vaccinate finfish for all regionally-relevant diseases for which an effective vaccine exists. <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion.</p> <p>If disagree / strongly disagree, please explain why:*</p>	Feasibility	Academia/Research; Finfish Farms (Producers); Veterinarians; Environmental NGOs	Workshop Pilots 1:1
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2.14	<p><i>Indicator scope: finfish only</i></p> <p>Indicator 2.14.1: The UoC shall vaccinate finfish for all regionally-relevant diseases for which an effective vaccine exists</p> <p>Do you think there should be an exception for smallholders/extensive farming UoC's to comply with 2.14.1? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree If you agree / strongly agree, please indicate why:*</p>	Approval	Academia/Research; Finfish Farms (Producers); Intergov. Orgs Veterinarians; Environmental NGOs	Survey 1:1
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³¹ **Wet feed:** See Definition List.

³² **Moist pellets:** See Definition List.

³³ **Uncooked or unprocessed fish:** See Definition List.

2.14	<p><i>Indicator scope: salmon only</i></p> <p>Indicator 2.14.2: The UoC shall, when stocking an individual site, only stock single year class fish.</p> <p>Which species other than salmon should this indicator apply to?</p>	Information	Producers, CABs, Environmental NGOs	Survey
2.14	<p><i>Indicator scope: finfish only</i></p> <p>Indicator 2.14.3: The UoC shall regularly remove mortalities and moribund animals and dispose of mortalities responsibly; responsible disposal mechanisms are listed in 2.12 Material use, Waste and Pollution.</p> <p>Do you agree it is feasible to regularly remove mortalities and moribund animals and dispose of mortalities responsibly.</p> <p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Feasibility	Academia/Research; Finfish Farms (Producers); Intergov. Orgs; Veterinarians; Environmental NGOs	Workshop; 1:1 Pilots
2.14	<p><i>Indicator scope: finfish only</i></p> <p>Indicator 2.14.3: The UoC shall regularly remove mortalities and moribund animals and dispose of mortalities responsibly; responsible disposal mechanisms are listed in 2.12 Material use, Waste and Pollution.</p> <p>For which species other than finfish would this indicator be relevant?</p>	Information	Academia/Research; Farms (Producers); Intergov. Orgs; Veterinarians; Environmental NGOs	Survey
2.14	<p><i>Indicator scope: finfish only</i></p> <p>Indicator 2.14.3: The UoC shall regularly remove mortalities and moribund animals and dispose of mortalities responsibly; responsible disposal mechanisms are listed in 2.12 Material use, Waste and Pollution.</p> <p>Are there any culture systems/life stages, where removal of mortalities is not feasible/not necessary?</p> <p>Yes / No + don't know / no opinion</p> <p>If yes, please explain:</p>	Information	Academia/Research; Farms (Producers); Intergov. Orgs; Veterinarians	Survey
2.14	<p>Indicator 2.14.4: The UoC shall adhere to species-specific limits on mortality rates (Annex 1).</p> <p>Do you think that extensive production should be fully excluded from this indicator (regarding feasibility)?</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree</p>	Approval	Academia/Research; Farms (Producers);	Survey Pilots



	<p>Do you think there should be moderately reduced requirements for extensive producers? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree</p>		<p>Intergov. Orgs; Veterinarian s; Environment al NGOs</p>	
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2.14	<p>Indicator 2.14.12: The UoC shall maintain prescriptions for each application of therapeutants³⁴, including the following minimum information:</p> <ul style="list-style-type: none"> - diagnosis - etiology - purpose of use - product name, active ingredient and species to be treated - life stage of species to be vaccinated/treated - dose - duration or repetition of vaccination - administration method - minimum withdraw period - categorization of active ingredient according to the WHO List of Critically Important Antimicrobials for Human Medicine - antimicrobial susceptibility tests results, either prior or as post-treatment, as confirmatory alternatives strategies explored to the prescribed antimicrobial treatment. <p>Is there any other minimum information required for the therapeutants prescriptions not already listed in the proposed indicator? Please clarify.</p> <p><u>“Antimicrobial susceptibility tests results, either prior or as post-treatment, as confirmatory alternatives strategies explored to the prescribed antimicrobial treatment.” This will not be realistic for all types of diseases- realistic guidance must be given based on veterinary reality/knowledge.</u></p>	Approval	Academia/Research; Farms (Producers); Intergov. Orgs; Veterinarians; Environmental NGOs	Survey Pilots
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2.15	Indicator 2.15.4 - <i>Indicator scope: UoCs using parasiticides</i>	Feasibility	Farms Academia	Survey Pilots
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³⁴ This includes applications of antibiotics, parasiticides, antifungal, antiviral, hormones, anaesthetics, and vaccines.



	<p>The UoC shall monitor parasiticide residue levels annually in the benthic sediment directly outside the AZE³⁵.</p> <p>Do you agree it is feasible to monitor parasiticide residue levels in the benthic sediment? <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p> <p><u>Parasiticides used have been screened for environmental impacts as part of their licensing regime. Adding monitoring will increase costs.</u></p>			
2.15	<p>Should ASC consider all types of parasiticides (e.g. including oral and bath)?</p> <p>Answer options: Yes / No + don't know / no opinion</p> <p>If No, please explain why:*</p> <p><u>A lot of uncertainties on measuring bath parasiticide residues in the sediment. Again, if parasiticides that are legally approved (i.e. environmental assessment done as part of the licensing regime) are done, there is no need for additional sampling.</u></p>	Information	Academia/Research; Farms (Producers); Veterinarians; Environmental NGOs	Survey
2.15	<p>Indicator 2.15.9 - The UoC shall apply treatment rotation^{36 37}, providing that the farm has >1 effective parasiticide available, with every third treatment.</p> <p>Do you agree it is feasible to apply treatment rotation, providing that the farm has >1 effective parasiticide available, with every third treatment? <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Feasibility	Academia/Research; Farms (Producers); Veterinarians; Environmental NGOs	Survey Pilots

³⁵ ASC guidance on the actual collection/sampling and analysis regarding parasiticide residue levels is pending. Until this guidance is available, compliance with the indicator is not required and auditors shall treat this indicator as non-applicable in the Audit Report. The guidance, when published, will establish the effective implementation date for this indicator (see also QA0111).

³⁶ This is in addition to, and independent of, the susceptibility test outcome in 2.15.6 or the bio-assay analysis outcome in 2.15.8.

³⁷ In the context of this criterion, treatment rotation means using an active ingredient belonging to a different family of parasiticides.



2.15-x	<p>C. Requirements on sampling protocols</p> <ol style="list-style-type: none"> 1) <u>Frequency</u>: Weekly sampling during the sensitive period. Monthly sampling the rest of the year. 2) <u>Number of cages</u>: At least 50% of cages shall be sampled over a 2-week period, with the entire farm sampled over at least a 6-week period. 3) <u>Number of fish per cage</u>: A minimum of 10 fish per cage should be sampled. 4) <u>Sea lice stage</u>: At a minimum provide data on mobiles³⁸ and adult females <p>Do you know of any jurisdictions or types of farms for which the implementation of the proposed requirement on sampling protocols will be challenging? Answer options: Yes / No If Yes, please explain the circumstances and the challenges:</p>	Information	Salmon farms; Government ; Academia/Research; Veterinarians; Environmental NGOs	Survey Pilots Workshop 1:1
2.15-x	<p><u>Fish welfare (exemption from sampling)</u>: The veterinarian or fish health professional may exempt fish from being sampled during a certain period of time within the sensitive period. The reason for the exemption shall be documented. Grounds for exemption may include:</p> <ul style="list-style-type: none"> • Immediately after smolting and stocking. • Undergoing a disease event and/or being treated (including treatment for sea lice). In case the reason for the exemption is related to fish treatment, the maximum duration for the exemption shall be 2 weeks. • During specific environmental events (e.g.: water temperature [i.e., below 4°C], low oxygen, algal bloom, jellyfish event). <p>If you would like to propose other potential reasons for exemption from sampling, please list them here:</p>	Information	Academia/Research; Salmon Farms; Veterinarians; Environmental NGOs	Survey Pilots
2.15-x	<p>Do you have additional information or scientific references that ASC can review to support or refine the recommendation on setting a regionally relevant lice level (in the context that, as starting place, ASC will use the lowest action/trigger level in jurisdictions today).</p>	Information	Government ; Academia; Salmon producers; Environmental NGOs	Survey 1:1
2.15-x	<p>2.15.20 The UoC shall maintain on-farm sea lice levels during the sensitive period below the thresholds, or in case of exceeding those thresholds reduce levels below the thresholds within [TBD] days upon exceedance, as outlined in Appendix XX "Sea Lice Thresholds for Sensitive Periods".</p>	Feasibility	Salmon producers;	Pilots Survey

³⁸ Pre-adult and adult sea lice males.



	<p>What timeline would you propose to allow, for bringing the sea lice level below the maximum threshold? [Text box] + don't know / no opinion</p> <p>Should follow national regulatory approach when exiting.</p>		<p>Environment al NGOs</p>	
<p>2.15-x</p>	<p>Appendix XX includes: The veterinarian or fish health professional may exempt fish from being treated and, therefore, the ability to reduce the on-farm sea lice levels below the threshold within [TBD] days upon exceedance, during a certain period of time within the sensitive period if local regulations permit. The reason for the exemption shall be documented. Grounds for exemption may include: specific environmental events (extreme weather event, water temperature [i.e. below 4°C], low oxygen, algal bloom, jellyfish event), unforeseen increases in on-farm lice levels, documented logistical roadblocks or delays for implementing treatment.</p> <p>If you would like to propose any additional special circumstances under which the allowed timeline for exceeding the maximum threshold should be extended, please list them here:</p>	<p>Informat ion</p>	<p>Salmon producers; Environment al NGOs</p>	<p>Pilots Survey</p>
<p>2.16</p>	<p>ASC proposes to not allow Critically Important Antibiotics on ASC labelled products. Do you agree with this? Answer options: strongly agree – agree – neutral – disagree – strongly disagree Please indicate why:*</p> <p>WHO recommendation should be accepted as per WHO recommendations, antimicrobials listed as Critically Important for human medicine can only be used as exemptions, under the judgement, prescription and supervision of a veterinary professional, and if microbial sensitivity results demonstrate that the selected antimicrobial is the only treatment option</p>	<p>Approv al</p>	<p>General</p>	<p>Survey Workshop 1:1</p>
<p>2.16</p>	<p>ASC proposes to require an overtime reduction in the total antibiotic load. This would be a new requirement for all ASC certified farms. Do you agree with this requirement? Answer options: strongly agree – agree – neutral – disagree – strongly disagree Please indicate why:*</p> <p>There should be an ambition to reduce antibiotic load and actions taken towards that goal but the reduction may not be achievable within a certain time frame because of for example lack of effective vaccines.</p>	<p>Approv al</p>	<p>General</p>	<p>Survey Workshop 1:1</p>



2.17	<p>ASC aims to address the impact of pre-Grow Out sites (e.g. hatcheries) using the same indicators as for Grow Out sites. Do you agree this aim is feasible? <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Feasibility	Producers, CABs, Environmental NGOs	Survey Workshop 1:1 Pilots
2.17	<p>Does the proposal close current “gaps” in standard application, ensuring all elements of production are considered?</p>	Approval	Environmental NGOs	Workshop 1:1
2.17	<p>Which option do you prefer to verify compliance of the pre-Grow Out sites?</p> <ul style="list-style-type: none"> • Option 1: on-site inspections of the pre-Grow Out sites by a qualified internal auditor from the UoC, using the ASC inspection template, reviewed by the CAB during the UoC audit with spot-checks as necessary by third-party auditors of intermediate sites in salmon production • Option 2: on-site audits by third party CAB auditors or by UoC auditors with equivalent qualifications <p>Other - please specify:</p> <p><u>Option 1 OR 2 should be allowed. For option 1 to be feasible the internal auditor requirements must be realistic (i.e. quality managers with experience with standards and audits)</u></p>	Approval	Producers, CABs, Environmental NGOs	Survey Workshop 1:1 Pilots
2.17	<p>This proposal separates production into “pre-growout” and “growout”, with the growout phase comprising the site of audit, or the UoA. For finfish, the “pre-growout” phase will include any sites used prior to the harvest site (e.g. hatchery site, intermediate site or holding site). Shrimp will include any production units holding shrimp from PL25 onwards. Abalone and bivalve will include any sites from the point of translocation onwards. Do you agree these definitions adequately cover the sites used and potential impacts as intended?</p> <p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:* Please outline any other considerations you believe are required (e.g. applicability for smaller sites).</p>	Approval	Producers, CABs, Environmental NGOs, Academics	Survey Workshop 1:1 Pilots
2.17	<p>ASC suggests that the requirement to use ASC compliant feed from ASC certified feed mills applies from first feeding with pellets onwards. In other words, when no feed is used, live feed is used, crumble/granulates/micro-pellets <1.5mm or seaweed is used, the requirement to use ASC compliant feed does not apply. Is this a feasible balance between having robust feed requirements for the far majority of feed quantity but allowing some flexibility for very early stage feeding for which there is much less flexibility/options of sourcing?</p>	Feasibility	Producers, Feed mills	Workshop Pilots



	<p>We have a comment on 2.18. 5 “ The UoC shall engage/demonstrate commitment to collaborate with NGOs, academics, and governments on areas of mutually agreed research to measure possible impacts on communities, wild stocks, the wider ecosystem and essential ecosystem services on which wildlife depend. “ It should not be mandatory to have a NGO collaboration within an ABM. The indicator should read as “... to collaborate with NGOs, academics OR government” not AND.</p>			
3.1	<p>Indicators 3.1.5 – 3.1.8 specify requirements for medical testing. Could these indicators give license to a UoC to conduct medical testing, if they hadn't considered it previously? ANSWER OPTIONS: Yes/No Please explain how:</p>	Approval	CABs	Survey
3.1	<p>Indicator 3.1.5 During the recruitment process, the UoC, or if applicable the agency(ies) involved in recruitment shall not require medical tests, unless required for the function of the job. Is there any reason why medical testing should be used for recruitment? ANSWER OPTIONS: Yes/No</p>	Approval	General	Survey
3.2	<p>The Standard does not currently provide a timeline for remediation apart from the 90-day timeline required for closure of a corrective action. The Standard should include a separate timeline for remediation for forced labour. ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If agree / strongly agree, please explain why and what you believe the timeline should be:*</p>	Approval	Social NGO, academics	Survey
3.2	<p>Indicator 3.2.1 is classified as “critical indicator”. This means that any non-compliance on this indicator would: a) Trigger a critical non-compliance, which is an appropriate measure given that the severity of the issue addressed in the indicator; b) Trigger the subsequent remediation indicator (3.2.2).</p>	Approval	General	Survey Workshop 1:1



	<p>Do you agree with the classification of indicator 3.2.1 as “critical indicator”.</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree.</p> <p>If strongly disagree / disagree, please explain why:*</p>			
3.3	<p>Indicator 3.3.5: The UoC may employ children aged 13 and 14 years old, to conduct light work only, but shall make sure that:</p> <ul style="list-style-type: none"> - The child receives appropriate training prior to work; - The child receives appropriate supervision; - It does not jeopardise schooling. <p>This indicator is consistent with ILO standards and the prohibition against child labour.</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don’t know / no opinion.</p> <p>If disagree / strongly disagree, please explain why:*</p>	Approval	Social NGO, academics	Survey
3.3	<p>The ILO (and some countries) permit children aged 13 and 14 to conduct light work. Should the ASC standard permit children of this age to be employed in light work on the farms, or should this requirement be restricted to work on family farms only?</p> <p>Option 1. The ASC standard should permit children of this age to be employed in light work on the farms Option 2. The ASC standard should only permit children of this age to work at family farms Other - please specify</p> <p>(Note, for workshop: are we driving them away from school, or are we driving them towards a system of regulation and protection?)</p>	Approval	Producers, CABs, Retail/Brands, Social NGOs, Academics	Survey Workshop 1:1
3.3	<p>Indicator 3.3.1) is classified as “critical indicator”. This means that any non-compliance on this indicator would:</p> <ol style="list-style-type: none"> a) Trigger a critical non-compliance, which is an appropriate measure given the severity of the issue addressed in the indicator; b) Trigger the subsequent remediation indicator (3.3.2). <p>Do you agree with the classification of indicator 3.3.2 as “critical indicator”.</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree.</p> <p>If strongly disagree / disagree, please explain why:*</p>	Approval	General	Survey Workshop? 1:1



3.5	<p>The Standard requires that no medical tests (that are not mandatory by the regulatory labour agency) should be carried out as part of the recruitment process. Are there cases or situations where this would need to take place? <u>Answer options</u> Yes /No</p> <p>If yes, what would these situations be?*</p> <p>We have a comment on 3.5.6. When using external divers, which requirements do we have for them? 3.5.13 Suitable areas for breastfeeding women and additional breaks for breastfeeding and pregnant women: Regulated by Law in Norway. What are the limits/specific requirements regarding time and period from ASC? 3.5.16 Structural integrity of all buildings and structures: what is the evidence we have to provide?</p>	Information	Producers	Survey
3.5	<p>Indicator 3.5.8 - Where not provided by a Regulatory agency State/National social security/health system, the UoC shall provide and pay for insurance³⁹ for all employees for work-related accidents or injuries; this includes as a minimum the cost for transport and medical treatment/medication needed to treat the accident or injury, the cost for transport and medical treatment/medication needed for recovery, compensation for lost working hours, as well as the cost for any required repatriation in case of migrant workers.</p> <p>Do you agree indicator 3.5.8 (on insurance) is financially feasible for farms? <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Feasibility	Producers (both Large and SMEs), Social NGOs	Survey Workshop 1:1
3.5	<p>Indicator 3.5.10 - The UoC shall provide access to adequate and clean sanitary facilities, with adequate privacy, which includes separation by gender if required.</p> <p>Should 'adequate and clean sanitary facilities' be more clearly defined? (e.g., include correct and safe disposal of waste or running water) Yes/No If yes, please provide suggestions for what this definition should include:*</p>	Approval	Producers (both Large and SMEs), Retail/Brands, Social NGOs	Survey Workshop 1:1

³⁹ Where no suitable insurance is available, the UoC may have a system to cover these costs directly.



<p>3.7</p>	<p>Indicator 3.7.1 - The UoC shall ensure that all employees have received, understood and agreed upon, written and understandable information about their employment terms and conditions before starting employment and where applicable prior to migration. This information shall include, at a minimum:</p> <ul style="list-style-type: none"> • a description of the role and any responsibilities, • the type of contract (e.g. permanent, fixed-term, contractor), • working hours, including allowance for breaks, • paid annual leave and allowance for days off on public holidays, • sick leave, • wages, • any agreed wage deductions (e.g. accommodation, meals), • compensation for overtime, • social benefits (e.g. insurances), • termination terms and conditions; notice period, • access to relevant human rights and labour-related policies • access to information on labour rights as per 1.1.3. <p>It is feasible for migrant workers to receive written and understandable information about their employment terms and conditions prior to migration. <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	<p>Feasibility</p>	<p>Producers (both Large and SMEs), Social NGOs, Academics</p>	<p>Survey Workshop 1:1</p>
<p>3.7</p>	<p>Definition of Labour-only contracting arrangements: The practice of hiring employees without establishing a formal employment relationship for the purpose of avoiding payment of regular wages or the provision of legally required benefits, such as health and safety protections.</p> <p>Do you think it is always feasible to restrict the use of labour-only contracting? <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	<p>Feasibility</p>	<p>Producers (both Large and SMEs), Social NGOs, Academics</p>	<p>Survey Workshop 1:1</p>
<p>3.7</p>	<p>Do you think there are contexts in which it is appropriate to allow sub-contracting employees to avoid labour liabilities? Do you think it is always feasible to restrict the use of labour-only contracting? <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If agree / strongly agree, please specify which contexts you meant:*</p>	<p>Approval / information</p>	<p>General</p>	<p>Survey Workshop 1:1</p>



3.9	<p>Indicator 3.9.1 - The UoC shall keep records of the hours worked by every employee. These records shall be validated / verified by the employees.</p> <p>Is it necessary that employees validate / verify records of hours worked, or is the record itself sufficient? <u>Option 1:</u> The employee must validate or verify <u>Option 2:</u> The record suffices <u>Option 3:</u> Don't know / no opinion</p> <p>Please explain why</p> <p><u>There are agreements with employee representatives, allowed by national employment law which would not be aligned with ASC requirements. They exist due to the nature of farming being in isolated areas where often a shift regime is in place. 3.9.1 Keep records of hours worked by all employees: Can exemptions for management on site be considered? 3.9.5 Overtime is not more than 12 hours a week: We have agreements with employee representatives that allow for max 20 hours, allowed by national employment law. 3.9.7 Adults: Breaks are not less than 1 hour within 8 hours of work: Law says 30 min if working day is more than 5,5 hours. Allowed 5 min break every hour. 3.9.8 Adults: Daily rest is not less than 11 hours within 24 hours: Agreement with employee representatives that we can have rest reduced to 8 hours in special circumstances. 3.9.9 Adults: Weekly rest is not less than 24 consecutive hours within 7 days and 2 rest days within 14 days: Special agreements with employee representatives on this.</u></p>	Approval / information	Producers (both Large and SMEs), Social NGOs, Academics	Survey Workshop 1:1
3.9	<p>Indicator 3.9.3 - The UoC shall ensure that overtime hours are voluntary, occur only under exceptional circumstances and are not requested regularly.</p> <p>Overtime should be requested of employees only under 'exceptional circumstances' and is not appropriate under normal circumstances. <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Approval	Producers (both Large and SMEs), Social NGOs, Academics	Survey Workshop 1:1
3.12	<p>Annex 5, Table 1, Grievance Mechanism Requirements no. 3 - All grievances shall be addressed within a 90-day timeframe of submission.</p> <p>Do you agree 90 days is a feasible timeframe for remediation?</p>	Feasibility	Producers (both Large and SMEs), Social	Survey Workshop 1:1



	<p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>		NGOs, Academics	
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3.13	<p>In a previous draft of this Standard, there were two criteria on this subject, one on Communities and one on Indigenous and tribal peoples. In order to avoid repetition in the Standard, this version has just one Criterion on Community Engagement, which includes two indicators that are specifically focused on Indigenous and tribal peoples, although they are named in each indicator.</p> <p>Do you agree that having just one Criterion for communities, which includes both the local communities and Indigenous and tribal peoples in this Criterion is sufficient and appropriate?</p> <p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree</p> <p>If disagree / strongly disagree, please explain why:*</p>	Approval	Social NGOs, Academics	Survey
3.13	<p>Indicator 3.13.4 - The UoC shall be able to demonstrate the right to use the land and water. Where there is a transfer of ownership or usage of land from local people, Indigenous and tribal peoples or other stakeholders to the UoC, such transfer shall be carried out through consultations with these populations.</p> <p>ASC has not yet included rigorous indicators and process around Free, Prior and Informed Consent (FPIC) in the standard. Do you think indicator 3.13.4 is adequate, including guidance that notes that best practice is to use an FPIC process?</p> <p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Approval	Producers (both Large and SMEs), Social NGOs, Academics	Survey Workshop 1:1

RMF	<p>Do you think the concept of risk management as laid out in the Risk Management Framework (RMF) is in line with scientific advice?</p> <p><u>ANSWER OPTIONS:</u> strongly agree – agree – neutral – disagree – strongly disagree</p> <p>If disagree / strongly disagree, please explain why:*</p>	Approval / Information	Academics	Survey
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	We do not have access to the RMF app or framework so not possible to provide correct feedback at this stage. We need to test it first but a first comment is that companies have already their own RMF so this requirement may lead to unnecessary duplication of efforts (which lead to increased costs with to additional value). ASC should consider accepting existing RMF as part of the company's management approach.			
RMF	Please indicate any relevant scientific advice we should be aware of:	Information	Academics	Survey
RMF	Do you think the concept of risk management as laid out in the Risk Management Framework (RMF) is in line with best practice in risk management? <u>ANSWER OPTIONS:</u> strongly agree – agree – neutral – disagree – strongly disagree If disagree / strongly disagree, please explain why:*	Approval	General	Survey Workshop
RMF	Which potential unintended negative consequences of using this tool do you foresee, if any? Duplication of work when companies have already a RMF in place. Duplicate leads to increase costs and frustration within organizations.	Information	General	Survey

Final questions

1. Farm Standard Scope – any comments?
2. The proposed standard encompasses all relevant aquaculture sustainability topics. Scale: 1 – 5 (strongly disagree – strongly agree)
 - a. If disagree / strongly disagree: what topic do you think is missing?
 - b. Why do you think this topic should be added?
3. Annex 1 Species performance levels – Do you have any comments?
4. Annex 2 Data recording and submissions Concept text – Do you have any comments?



5. Annex 6 List of Acronyms, Definitions and Verbal Forms used – Do you find that any definitions are unclear or missing? Yes/No; If yes, please specify:
6. The proposed standard overall is understandable to me. Scale: 1 – 5 (strongly disagree – strongly agree)
 - a. **There are a lot of details on guidance, RMF, Energy Management Plan, etc which are not available yet and can strongly influence the comments to each indicator.**
7. Are there any other general comments on the proposed standard that you were unable to insert in previous sections?
8. The proposed Farm Standard has my support. Scale: 1 – 5 (strongly disagree – strongly agree)
9. Do you want to stay informed with our latest programme updates? Subscribe to our newsletters:
 - a. ASC Global newsletter
 - b. Global certification update
 - c. ASC France newsletter
 - d. ASC DACH newsletter
 - e. ASC Japan newsletter
 - f. ASC US newsletter
 - g. ASC Australia newsletter
 - h. CABs newsletter



PRINCIPLE 1: THE UOC OPERATES LEGALLY AND APPLIES EFFECTIVE BUSINESS MANAGEMENT

- CRITERION: 1.1 – LEGAL COMPLIANCE
- CRITERION: 1.2 – MANAGEMENT SYSTEM
- CRITERION: 1.3 – BUSINESS ETHICS
- CRITERION: 1.4 – TRACEABILITY AND TRANSPARENT DISCLOSURE – 1.4.4.

PRINCIPLE 2: THE UOC OPERATES IN AN ENVIRONMENTALLY RESPONSIBLE MANNER

- CRITERION 2.1 - THE UOC IS IN COMPLIANCE WITH APPLICABLE ENVIRONMENTAL REGULATIONS
- CRITERION 2.2 - ECOLOGICALLY IMPORTANT HABITATS – 2.2.8/2.2.9/2.2.10
- CRITERION 2.3 - THE UOC MINIMIZES WILDLIFE INTERACTIONS – 2.3.7/2.3.8./2.3.9.
- CRITERION 2.4 - THE UOC AVOIDS THE CULTURE OF NEW NON-NATIVE SPECIES
- CRITERION 2.5 – ESCAPES – 2.5.1., 2.5.2., 2.5.9. (DEFINITIONS)
- CRITERION 2.6 – BENTHIC IMPACTS
- CRITERION 2.7 - WATER QUALITY
- CRITERION 2.8 - SALINISATION
- CRITERION 2.9 – BIOSOLIDS
- CRITERION 2.10 – FRESHWATER USE
- CRITERION 2.11 - ENERGY USE AND GREENHOUSE GAS EMISSIONS
- CRITERION 2.12 - MATERIAL USE, WASTE AND POLLUTION CONTROL
- CRITERION 2.13 - FEED
- CRITERION 2.14 – FISH HEALTH AND WELFARE
- CRITERION 2.15 - PARASITE AND PATHOGEN CONTROL – RATIONALE? 2.15.1, 2.15.2, 2.15.3 (ANNEX 1), KEY CONSIDERATIONS – SAME AS INDICATOR REVIEW COMMENTS, 2.15.15 AND 2.15.16 (APPENDIX II-2), 2.15.18? 2.15.19 AND APPENDIX III-1? 2.15.20 AND APPENDIX XX
- CRITERION 2.16 - ANTIBIOTICS AND OTHER VETERINARY THERAPEUTANTS
- CRITERION 2.17 - HATCHERIES AND INTERMEDIATE SITES
- CRITERION: 2.18 - AREA BASED MANAGEMENT – 2.18.1. AND ANNEX 13

PRINCIPLE 3 - THE UOC OPERATES IN A SOCIALLY RESPONSIBLE MANNER

- CRITERION: 3.1 – RIGHTS AWARENESS
- CRITERION: 3.2 – FORCED, BONDED, COMPULSORY LABOUR AND HUMAN TRAFFICKING
- CRITERION: 3.3 – CHILD LABOUR
- CRITERION: 3.4 – DISCRIMINATION
- CRITERION: 3.5 – HEALTH AND SAFETY
- CRITERION: 3.6 – COLLECTIVE BARGAINING AND FREEDOM OF ASSOCIATION
- CRITERION: 3.7 – TRANSPARENT CONTRACTS
- CRITERION: 3.8 – WAGES
- CRITERION: 3.9 – WORKING HOURS
- CRITERION: 3.10 – WORKPLACE CONDUCT RESPONSE
- CRITERION: 3.11 – EMPLOYEE ACCOMMODATION



CRITERION: 3.12 – GRIEVANCE MECHANISM

CRITERION: 3.13 – COMMUNITY ENGAGEMENT

- I do not wish to provide feedback on specific criteria.

Per criteria we will ask:

1. What, if anything, would you like to see changed in this criterion? Select all answers that apply:

- a. Rationale

The rationale should summarise why the criterion and its associated impacts should be included in evaluation of responsible aquaculture practices.

- b. The intent statement

The Intent statement should communicate the desired state from the rationale.

- c. The scope definition(s) in this criterion (applicability to production systems/species)

- d. The appendices to this criterion

Please check the appendices in the full standard document.

- e. The indicators

- i. Please select all the indicators you would like to provide comments for. When possible, please include proposed new indicator language in your feedback.

- f. Nothing – I agree with this criterion and how it is phrased.

2. In this proposed standard we introduce a Risk Management Framework (RMF). This criterion includes a link with the RMF.

In effect, one of the following criteria:

P2: 2.2, 2.3, 2.4, 2.5, 2.8, 2.10,

P3: 3.2, 3.3, 3.5, 3.13

<p>The link with the Risk Management Framework in this criterion is clear. <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree</p> <p>Why or why not?*</p> <p><u>Comment box</u></p>	Feasibility	Producers, CABs	Survey Workshop 1:1
<p>It is clear how the farms comply with the Indicators concerning the Risk Management Framework. <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree</p>	Feasibility	Producers, CABs	Survey Workshop 1:1



Why or why not?*

Comment box

CRITERION: 1.4 – TRACEABILITY AND TRANSPARENT DISCLOSURE

1. What, if anything, would you like to see changed in this criterion? Select all answers that apply:

a. Rationale

The rationale should summarise why the criterion and its associated impacts should be included in evaluation of responsible aquaculture practices.

b. The intent statement

The Intent statement should communicate the desired state from the rationale.

c. The scope definition(s) in this criterion (applicability to production systems/species)

d. The appendices to this criterion

Please check the appendices in the full standard document.

e. The indicators

i. Please select all the indicators you would like to provide comments for. When possible, please include proposed new indicator language in your feedback.

On indicator 1.4.4., we reiterate the points made as part of the representation made to the TCG Group on the revision of the sea lice indicator with regards to point (i).

f. Nothing – I agree with this criterion and how it is phrased.

CRITERION 2.2 - ECOLOGICALLY IMPORTANT HABITATS

1. What, if anything, would you like to see changed in this criterion? Select all answers that apply:

a. Rationale

The rationale should summarise why the criterion and its associated impacts should be included in evaluation of responsible aquaculture practices.

b. The intent statement

The Intent statement should communicate the desired state from the rationale.

c. The scope definition(s) in this criterion (applicability to production systems/species)

d. The appendices to this criterion

Please check the appendices in the full standard document.

e. The indicators

i. Please select all the indicators you would like to provide comments for. When possible, please include proposed new indicator language in your feedback.



2.2.1 – we agree with this indicator, but not the exception for farms ‘built legally prior to the designation of the PA’ **unless** the specific activity of fish farming in that area is not contrary to the conservation objectives of the protected area in question. We would also ask ASC to further define areas of such ecological importance that it would never be acceptable to certify a site situated there.

2.2.8 – We would welcome the opportunity to comment further on this indicator when there is further information regarding the RMF app and its consequent impacts on sensitive/critical habitats.

- f. Nothing – I agree with this criterion and how it is phrased.
2. In this proposed standard we introduce a Risk Management Framework (RMF). This criterion includes a link with the RMF.

In effect, one of the following criteria:

P2: 2.2, 2.3, 2.4, 2.5, 2.8, 2.10,

P3: 3.2, 3.3, 3.5, 3.13

<p>The link with the Risk Management Framework in this criterion is clear. <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree</p> <p>Why or why not?*</p> <p>Comment box</p>	Feasibility	Producers, CABs	Survey Workshop 1:1
<p>It is clear how the farms comply with the Indicators concerning the Risk Management Framework. <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree</p> <p>Why or why not?*</p> <p>It is not clear how operators should provide or maintain wildlife corridors or ecological buffer zones, and in particular how any new research should be considered. In this context, migration routes of wild salmonids is relevant. The definition of ‘Buffers and corridors’ should be more prescriptive and should provide a table of reference for farm operators based on current definitions for each species in the individual standards. Similarly, the definition seems insufficient to provide guidance as to how to set the parameters of such zones in areas where this may need to be done by the operators themselves.</p> <p>Comment box</p>	Feasibility	Producers, CABs	Survey Workshop 1:1

CRITERION 2.3 - THE UoC MINIMIZES WILDLIFE INTERACTIONS

1. What, if anything, would you like to see changed in this criterion? Select all answers that apply:

a. Rationale

The rationale should summarise why the criterion and its associated impacts should be included in evaluation of responsible aquaculture practices.



The term 'wildlife interactions' is not useful here, as there are many interactions with wildlife which sit in other parts of the standards e.g. the impact of sea lice on wild salmonids. We would therefore suggest that this section is renamed.

b. The intent statement

The Intent statement should communicate the desired state from the rationale.

The farm should also endeavour to minimise impacts which can arise for local wildlife in areas where aquaculture is present.

c. The scope definition(s) in this criterion (applicability to production systems/species)

d. The appendices to this criterion

Please check the appendices in the full standard document.

e. The indicators

i. Please select all the indicators you would like to provide comments for. When possible, please include proposed new indicator language in your feedback.

f. Nothing – I agree with this criterion and how it is phrased.

2. In this proposed standard we introduce a Risk Management Framework (RMF). This criterion includes a link with the RMF.

In effect, one of the following criteria:

P2: 2.2, 2.3, 2.4, 2.5, 2.8, 2.10,

P3: 3.2, 3.3, 3.5, 3.13

<p>The link with the Risk Management Framework in this criterion is clear. <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree</p> <p>Why or why not?*</p> <p><u>Comment box</u></p>	<p>Feasibility</p>	<p>Producers, CABs</p>	<p>Survey Workshop 1:1</p>
<p>It is clear how the farms comply with the Indicators concerning the Risk Management Framework. <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree</p> <p>Why or why not?*</p> <p><u>Comment box</u></p>	<p>Feasibility</p>	<p>Producers, CABs</p>	<p>Survey Workshop 1:1</p>

CRITERION 2.5 – ESCAPES

1. What, if anything, would you like to see changed in this criterion? Select all answers that apply:

a. Rationale

The rationale should summarise why the criterion and its associated impacts should be included in evaluation of responsible aquaculture practices.



ASC-certified farms should strive to *eliminate* escapes, and therefore we would suggest the wording in this rationale is changed from “minimised as much as possible” to “eliminated”.

b. The intent statement

This statement should be stronger in that farms seek to *eliminate* escapes. The intent should also encompass addressing any impact to local wildlife, and the standard should be adjusted accordingly as below.

The Intent statement should communicate the desired state from the rationale.

c. The scope definition(s) in this criterion (applicability to production systems/species)

d. The appendices to this criterion

Please check the appendices in the full standard document.

e. The indicators

i. Please select all the indicators you would like to provide comments for. When possible, please include proposed new indicator language in your feedback.

2.5.1 – ‘mass escape events’ vs. ‘chronic leakage’ – in the definitions list, there is also included a definition for a ‘leakage escape’ which is confusing. Assessing compliance with 2.5.1 for cage-culture farms should require both an assessment of fish numbers on-farm, *plus* monitoring for escaped farmed fish in the wild and therefore we seek a change to the standard to include this, as was stated during the revision of the ASC Freshwater Trout Standard. CABs should be informed in the event that escaped farmed fish are detected in the environment, and a consequent investigation into the situation should be triggered by this.

2.5.2 – it is not clear how 2.5.1 and 2.5.2. match up with one another, given that 2.5.1. allows a maximum of 4% chronic leakage but 2.5.2. only allows a total of 1% unaccounted stock. We highlight here that NASCO, a UN convention to protect salmon, has defined an international goal of “100% farmed fish to be retained in all production facilities”. As a leading voluntary certification scheme, ASC should be at least as strong as this. This also reflects our comments above regarding the rationale and intent of this criterion.

2.5.9 – As a matter of course in our engagement with the salmon industry, we are notified within one day of any escape being detected. As part of this process, ASC should additionally specify that all relevant stakeholders should be notified directly of a mass escape event.

For any requirement relating to public disclosure, the information should be made available for the lifetime of the certification.

f. Nothing – I agree with this criterion and how it is phrased.

2. In this proposed standard we introduce a Risk Management Framework (RMF). This criterion includes a link with the RMF.

In effect, one of the following criteria:

P2: 2.2, 2.3, 2.4, 2.5, 2.8, 2.10,

P3: 3.2, 3.3, 3.5, 3.13



<p>The link with the Risk Management Framework in this criterion is clear. <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree</p> <p>Why or why not?*</p> <p><u>Comment box</u></p>	Feasibility	Producers, CABs	Survey Workshop 1:1
<p>It is clear how the farms comply with the Indicators concerning the Risk Management Framework. <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree</p> <p>Why or why not?*</p> <p><u>Comment box</u></p>	Feasibility	Producers, CABs	Survey Workshop 1:1

CRITERION 2.15 - PARASITE AND PATHOGEN CONTROL

1. What, if anything, would you like to see changed in this criterion? Select all answers that apply:

a. Rationale

We do not recognise the comment; 'There is significant debate in the scientific literature about the extent of the impact' as this does not reflect the current status of the scientific literature. This comment should be further substantiated or removed, in line with the review conducted by Revie et al. (2009) "Salmon Aquaculture Dialogue Working Group Report on Sea Lice"

The rationale should summarise why the criterion and its associated impacts should be included in evaluation of responsible aquaculture practices.

b. The intent statement

The intention of this indicator needs to be clear on the desire to protect wild fish species, and for farms to implement mechanisms for area based management which serve this purpose. The intent statement in this aligned standard is not as strong as the current ASC Salmon Standard. We again highlight that NASCO, a UN convention to protect salmon, has defined an international goal of "100% of farms to have effective sea lice management such that there is no increase in sea lice loads or lice-induced mortality of wild salmonids attributable to the farms", and ASC should be at least as strong as this to maintain its position as a leading certification standard.

The Intent statement should communicate the desired state from the rationale.

c. The scope definition(s) in this criterion (applicability to production systems/species)

d. The appendices to this criterion

We reiterate the comments made to the TCG as part of the revision of the sea lice indicator happening in parallel to the aligned farm standard. The same considerations and concerns stand, primarily focused on the fact that the intention of these indicators should be to protect wild fish, and around the definition of the sensitive period. To position itself as a robust and meaningful



voluntary certification scheme for wild fish, ASC must go beyond regulation in terms of how sea lice thresholds are set and managed. Frequency of parasite sampling for salmon farms also needs to be more prescriptive, in line with the current ASC Salmon standard.

Please check the appendices in the full standard document.

e. the indicators

- i. Please select all the indicators you would like to provide comments for. When possible, please include proposed new indicator language in your feedback.

We reiterate the comments made to the TCG as part of the revision of the sea lice indicator happening in parallel to the aligned farm standard. The same considerations and concerns stand, primarily focused on the fact that the intention of these indicators should be to protect wild fish, and around the definition of the sensitive period. To position itself as a robust and meaningful voluntary certification scheme for wild fish, ASC must go beyond regulation in terms of how sea lice thresholds are set and managed. Frequency of parasite sampling for salmon farms also needs to be more prescriptive, in line with the current ASC Salmon standard.

- f. Nothing – I agree with this criterion and how it is phrased.

CRITERION: 2.18 - AREA BASED MANAGEMENT

1. What, if anything, would you like to see changed in this criterion? Select all answers that apply:

a. Rationale

The rationale should summarise why the criterion and its associated impacts should be included in evaluation of responsible aquaculture practices.

b. The intent statement

The Intent statement should communicate the desired state from the rationale.

- c. The scope definition(s) in this criterion (applicability to production systems/species)

d. The appendices to this criterion

Please check the appendices in the full standard document.

e. the indicators

- i. Please select all the indicators you would like to provide comments for. When possible, please include proposed new indicator language in your feedback.

2.18.1 – ASC should further define how farms should manage an ABM in areas with other farm operators that are not signed up to ASC. What happens in a single area which contains both certified and non-certified farms, particularly where other farms are operated by other operators within that same area?

- f. Nothing – I agree with this criterion and how it is phrased.



Criteria no.	PC Question	Q categorisation	Audience	Type of engagement
1.1	<p>The rationale for Criterion 1.1 states that all ASC certified farms are expected to comply with local and national laws and regulations. The intent is that farms comply with applicable laws and regulations and are in possession of all required legal licenses and permits.</p> <p>Is it necessary to specify what other laws and regulations are “applicable” to ASC certification, besides those covered by Indicators 1.1.1-1.1.3?</p> <p>a. No, it is not necessary to specify. It can be treated on a case-by-case basis.</p> <p>b. Yes, other types of applicable laws should be specified. Please select which below:</p> <ol style="list-style-type: none"> 1. Business, operations, and financial laws 2. Transparency and impartiality laws 3. Record-keeping and reporting laws 4. Food safety and public health laws 5. Animal welfare laws 6. Packaging, labelling and product-related laws 8. All laws are applicable 9. Other – please specify: 	Approval	General	Survey
1.3	<p>Indicator 1.3.1 The UoC shall prevent acts of corruption¹, extortion, embezzlement or bribery.</p> <p>What challenges do you envision for Small and Medium sized Enterprises to implement indicator 1.3.1? Comment box</p>	Feasibility	SME producers, Social NGOs	Workshop 1:1
1.3	<p>Indicator 1.3.1 The UoC shall prevent acts of corruption², extortion, embezzlement or bribery.</p> <p>Do you think Indicator 1.3.1 should be classified as a Critical Indicator, meaning that if any non-compliance is detected the farm is immediately suspended?</p>	Information	General	Survey

¹ Corruption: See Definition List

² Corruption: See Definition List



	<u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree			
1.3	Indicator 1.3.2 The UoC shall ensure that records are not falsified, or manipulated and information is not misrepresented. What challenges do you envision for Small and Medium sized Enterprises to implement indicator 1.3.2? Comment box	Feasibility	SME producers, Social NGOs	Workshop 1:1
1.3	Indicator 1.3.2 The UoC shall ensure that records are not falsified, or manipulated and information is not misrepresented. Do you think Indicator 1.3.2 should be classified as a Critical Indicator, meaning that if any non-compliance is detected the farm is immediately suspended? <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree	Information	General	Survey

1.4	<u>Which situation is preferable:</u> (1) Farms must buy only ASC-compliant feed, which may be either segregated or mass balance. Farms and supply chain companies are required to identify and separate ‘fish fed ASC-compliant segregated feed’ from ‘fish fed ASC-compliant mass balance feed.’ This creates two types of ASC certified seafood which must always be kept separate using different claims, and has implications throughout the supply chain. Retailers and companies throughout the chain can exercise buying preferences for fish fed segregated feed. (2) Farms must buy only ASC-compliant feed, which may be either segregated or mass balance. Fish produced on compliant feed can be sold as ASC certified. All ASC certified fish is treated the same in the supply chain with equal claims (current situation). However, companies later in the chain beyond the farm cannot distinguish or prefer ASC fish fed segregated feed. (3) Another situation would be preferable – please describe.	Approval / Information		Producers, CABs, Retail/Brands	Workshop 1:1
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Criterion no.	PC Question	Q categorisation	Audience	Type of engagement
2.2	Indicator 2.2.3 (and related): Apart from PAs (protected areas), HCVAs (high conservation value areas), and mangrove ecosystems, the indicators also address sensitive and critical habitats and natural wetlands. In the context of this criterion the following scopes apply:	Information	NGOs, Academia	Survey Workshop, 1:1

Criteria on no.	PC Question	Q categorisation	Audience	Type of engagement
	<p>Sensitive habitats – In addition to those not captured by other habitat definitions, specifically include coral reefs and seagrass beds Critical habitats - habitats on which threatened and protected species depend Natural wetlands - marsh, fen, peatland, intertidal zone, estuaries, marine water shallower than six metres at low tide; permanent or temporary, with water that is static or flowing, fresh, brackish, or marine.</p> <p>Does this list include all types of habitats to be addressed? Yes/No If no, please specify: Important benthic habitats not covered by MPAs (e.g. in Scotland, maerl beds are an important and biodiverse habitat) also need to be covered. We understand that not all of these important habitats can be specified individually, so perhaps more general language to cover the range of important habitats should be identified.</p>			
2.2	<p>In the context of this criterion the following scopes apply: Sensitive habitats - In addition to those not captured by other habitat definitions, specifically include coral reefs and seagrass beds Critical habitats - habitats on which threatened and protected species depend Natural wetlands - marsh, fen, peatland, intertidal zone, estuaries, marine water shallower than six metres at low tide; permanent or temporary, with water that is static or flowing, fresh, brackish, or marine.</p> <p>ASC certified farms assess their impact on protected areas and areas with high biodiversity value, including mangroves. Do you agree that ASC certified farms should also assess the impact of their siting on other sensitive and critical habitats? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. Free comment-box. Free comments can only be given if a ranking has been selected prior.</p>	Approval	General	Survey, Workshop-Survey
2.2	<p>Do you support a “site-specific” approach to determine necessary ecological buffer-width in relationship to relevant habitats (e.g., riparian buffers, protected areas, sensitive/critical habitats) and ecological functions to be protected. ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. Free comment-box. Free comments can only be given if a ranking has been selected prior.</p>	Approval	General	Survey, Workshop-Survey
2.2	<p>ASC recognises that certain small scale aquaculture operations may have only had access to farm land after 1999. Should ASC consider a requirement that permits farm siting in mangroves after 1999, but only with the requirement that the farm must restore the same area (at least 100% of lost surface area) with same ecological functions? Yes / No / No opinion</p>	Information	Environmental NGOs, Small & large farms Retail/brands	Survey, Workshop, 1:1



Criteria on no.	PC Question	Q categorisation	Audience	Type of engagement
	Free comment-box will be made available as well. Free comments can only be given if an answer has been selected prior.		Academia / Research Government /regulator CAB / Auditor	
2.3	<p>Indicator 2.3.2 The UoC shall not intentionally or unintentionally kill mammals, elasmobranchs, birds, or reptiles (excluding vermin), unless for situations³ where injured animals are unlikely to recover, situations evidently threatening human safety, or where legal requirements mandate euthanasiation.</p> <p>Vermin: Vermin are pests or nuisance animals that spread diseases, harm or prey upon production species. The term is defined in relation to human activities, and therefore species may vary by region and in time. In the context of the ASC standard, threatened and protected species cannot be classified as vermin. A species may be listed as vermin by authorities, refer to listings, such as Wildlife Acts, wherever available.</p> <p>Do you agree with the proposed Indicator 2.3.2 to not allow any mortalities of mammals, elasmobranchs (sharks), birds or reptiles, unless any of the listed conditions apply? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. Free comment-box will be made available as well. Free comments can only be given if a ranking has been selected prior.</p>	Approval	Academia/Research CABs; Farm (Producers) Government /Regulator; Intergovernmental Organisations; IT solutions companies; NGOs	Survey, Workshop, 1:1 Sessions
2.3	<p>Do you agree with Indicator 2.3.3 to not allow the use of acoustic deterrent devices unless the farm can demonstrate that its use does not disturb cetaceans? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree.</p>	Approval	Academia/Research CABs; Farm (Producers)	Survey, Workshop-Survey; 1:1 sessions

³ Exceptions are limited to occasional mortality incidents, rather than systemic incidents, and as long as the incident does not affect the favourable population status. As an example, a written statement by a veterinarian or the responsible authorities may confirm animals were unlikely to recover or the situation evidently threatened human safety, and a written statement by authorities may confirm legal requirements to euthanise. In all cases, a written statement shall be available confirming that a) injured animals were unlikely to recover, b) animals evidently threatening human safety, or c) legal requirements mandated euthanasiation by a senior manager above the farm manager, which can be issued during or after the incident.



	Free comment-box will be made available as well. Free comments can only be given if a ranking has been selected prior.		Government /Regulator; Intergovernmental Organisations; IT solutions companies; NGOs	
2.3	<p>ASC recognizes that even where effective mitigation measures are implemented, occasional unintentional bird mortalities will occur. Should ASC remove birds as a specified species group in indicator 2.3.2 and consider an allowable metric limit for birds?</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree.</p> <p>Free comment-box will be made available as well. Free comments can only be given if a ranking has been selected prior.</p>	Information	Academia/Research CABs; Farm (Producers) Government /Regulator; Intergovernmental Organisations; NGOs	Survey, Workshop, 1:1

2.4	<p>2.4.1 The UoC shall only stock⁴ a non-native species if at least one of the below conditions is met:</p> <p>1) the species has existed in established wild population(s) in the culture area since 2010⁵;</p> <p>2) the species has been widely commercially produced⁶ in the culture area before 2010;</p> <p>3) the stock is to a high degree sterile⁷ or otherwise unable to establish wild populations;</p> <p>4) the species is cultured in fully-closed recirculating aquaculture systems⁸.</p>	Information	Farms; NGOs; Academia / Research; Government /regulator;	Survey, Workshop-Discussion
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⁴ This includes species stocked together with the culture fish for purposes such as parasite control.

⁵ The date (2010) refers to the year of release of the first ASC Standard.

⁶ Widely commercially produced: see Definition list

⁷ A high degree of sterility is achieved by:1) >98% triploidy monosex, 2) germ-cell migration disruption and 3) gene editing (CRISPR).

⁸ Fully closed RAS: see Definition List



	<p>Should there be any other conditions where ASC should allow the culture of non-native species? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. + don't know / no opinion If you agree / strongly agree, please indicate which condition(s):*</p>		<p>Intergovernmental organisation ; CAB / Auditor</p>	
2.4	<p>Fully-closed recirculating aquaculture systems: this means the system is land-based and prevents escapes from each stage in the production process, including for example eggs, larvae and alevins, in addition to adult fish. Fully closed means there is no direct pathway to the environment. Animal production must take place inside buildings built to withstand severe local weather conditions (e.g., tropical storms, flooding), and all effluents pass through multi-stage treatment systems including mechanical filtration prior to release.</p> <p>Do you agree with the definition above? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*</p>	information	<p>Farms; NGOs; Academia / Research; Government /regulator; Intergovernmental organisation ; CAB / Auditor</p>	<p>Survey, Workshop-Discussion</p>
2.4	<p>2.4.1 The UoC shall only stock⁹ a non-native species if at least one of the below conditions is met: 1) the species has existed in established wild population(s) in the culture area since 2010¹⁰; 2) the species has been widely commercially produced¹¹ in the culture area before 2010; 3) the stock is to a high degree sterile¹² or otherwise unable to establish wild populations; 4) the species is cultured in fully-closed recirculating aquaculture systems¹³.</p> <p>Current indicators do not address the special situation where non-native species have already become established or have been commercially farmed prior to 2010. However, continued farming of these non-native species in certain areas may have a remaining high potential to cause continued/new harm:</p> <p>Should ASC add an indicator, requiring that non-native <u>invasive</u> species are only permitted under option 3) or 4) in indicator 2.4.1?</p>	Approval & information	<p>Farms; NGOs; Academia / Research; Government /regulator; Intergovernmental organisation ; CAB / Auditor</p>	<p>Survey, Workshop-Survey</p>

⁹ This includes species stocked together with the culture fish for purposes such as parasite control.

¹⁰ The date (2010) refers to the year of release of the first ASC Standard.

¹¹ Widely commercially produced: see Definition list

¹² A high degree of sterility is achieved by:1) >98% triploidy monosex, 2) germ-cell migration disruption and 3) gene editing (CRISPR).

¹³ Fully closed RAS: see Definition List

	<p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. + don't know / no opinion</p> <p>If you agree / strongly agree , what source(s) should be used to classify/define "invasive species"?</p> <p>And</p> <p>What source(s) should be used to classify/define "known to harm"?</p> <p>ASC should not allow farms to produce non-native invasive species under any circumstances in an open water environment. Therefore, if permitted at all, this should only be permitted under option 4.</p>			
2.4	<p>2.4.1 The UoC shall only stock¹⁴ a non-native species if at least one of the below conditions is met:</p> <ol style="list-style-type: none"> 1) the species has existed in established wild population(s) in the culture area since 2010¹⁵; 2) the species has been widely commercially produced¹⁶ in the culture area before 2010; 3) the stock is to a high degree sterile¹⁷ or otherwise unable to establish wild populations; 4) the species is cultured in fully-closed recirculating aquaculture systems¹⁸. <p>Should ASC add a separate indicator with more limited conditions for non-native species which can sexually mature during grow-out?</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. + don't know / no opinion</p> <p>If you agree / strongly agree, which of the conditions 1) to 4) above should apply? (1-4; don't know / no opinion)</p>	Approval & information	Farms; NGOs; Academia / Research; Government /regulator; Intergovernmental organisation ; CAB / Auditor	Survey, Workshop-Survey
2.5	<p>Across the aquaculture industry, practices differ regarding fish counting. Whereas counting, and its associated technique, is advanced in the salmon industry, this might not be comparable in other cultured species (e.g. seabass, seabream, tropical finfish species, seriola/cobia).</p> <p>In addition, the impact of escaped salmon on their wild counterpart population is proven, whereas this is less tangible for other species.</p>	Approval & Information	General	Survey, Workshop, 1:1, Pilots

¹⁴ This includes species stocked together with the culture fish for purposes such as parasite control.

¹⁵ The date (2010) refers to the year of release of the first ASC Standard.

¹⁶ Widely commercially produced: see Definition list

¹⁷ A high degree of sterility is achieved by:1) >98% triploidy monosex, 2) germ-cell migration disruption and 3) gene editing (CRISPR).

¹⁸ Fully closed RAS: see Definition List



	<p>Within this context, should ASC set more strict escape limits for specifically salmon, or, set consistent escape limits for all cage-culture species equally?</p> <p>ANSWER OPTIONS (two options to choose from) + don't know / no opinion: ASC should set stricter limits for salmon only ASC should set consistent escape limits for all cage-culture species equally</p> <p>+ open comment box</p>			
2.5	<p>Unaccounted losses are defined as the total harvest number minus stocked number, known mortalities, and known escapes. Do you agree that not more than 4% of unaccounted fish loss should be permitted per production cycle (4%/cycle)? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. Free comment-box. Free comments can only be given if a ranking has been selected prior.</p>	Approval	General	Survey, Workshop
2.5	<p>Unaccounted losses are defined as the total harvest number minus stocked number, known mortalities, and known escapes. Do you agree that the percentage of unaccounted loss has to be reduced over time as a demonstration of improvement? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. Free comment-box. Free comments can only be given if a ranking has been selected prior.</p>	Approval	General	Survey, Workshop
2.5	<p>How should ASC handle the topic of escapes for culture systems such as ponds in areas of chronic flooding?</p>	Information	Farms, CABs, Academics, Governments	Workshop 1:1
2.5	<p>Do you agree it is realistic to expect all culture systems other than cages to have no mass escape events and no chronic leakage?</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:* Strongly agree, but reiterate that this should be possible for cage systems as well, in line with the NASCO international goals as stated above.</p>	Information	Farms, CABs, Academics	Survey
2.5	<p>2.5.2 Indicator scope: finfish only</p>	Information	Finfish farms, Finfish CABs,	Survey



	<p>The UoC shall reduce¹⁹ the number of unaccounted loss over time, by reducing the number of escapes and increasing counting accuracy, so that actual harvest counts result in a maximum of 1% unaccounted stock calculated over a 9-year period.</p> <p>Do you agree with this 1% unaccounted stock criterion calculated over a 9-year period? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree If you disagree / strongly disagree, please indicate why and what you think the percentage should be:*</p> <p>It is not clear why 9 years has been chosen, and ASC-certified farms should be striving to eliminate escapes for the reasons mentioned above.</p>		<p>Environment al NGOs, Academics</p>	
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2.6	<p>2.6.2 The UoC shall ensure an acceptable Ecological Quality Status (EQS) of the area surrounding the farm as outlined in Appendix I (Table 2).</p> <p>Do you agree with the following statement: “The EQS categories are applicable to all benthic habitats suitable for marine aquaculture”? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don’t know / no opinion. If you disagree / strongly disagree, please indicate why and what you think the percentage should be:*</p>	Approval	<p>Academia Regulators Farms with marine cages or suspended mollusc systems</p>	<p>Survey Pilots</p>
2.6	<p>2.6.2 The UoC shall ensure an acceptable Ecological Quality Status (EQS) of the area surrounding the farm as outlined in Appendix I (Table 2).</p> <p>Do the limits set for the various abiotic and biotic measures in Table 2 of Appendix I reflect the goal to minimise, mitigate or eliminate negative benthic habitat, biodiversity and ecosystem effects from seabed organic enrichment? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree If you disagree / strongly disagree, please indicate why:*</p>	Approval	<p>Environment al NGOs Academia Farms with marine cages or suspended mollusc systems</p>	<p>Survey Workshop</p>
2.6	<p>See Appendix I, Section 1.4 - Timing of sampling Do you have any information or scientific references that ASC can review to support or refine the proposed timing for sampling?</p>	Information	<p>Academia Farms with marine cages or suspended</p>	<p>Survey</p>

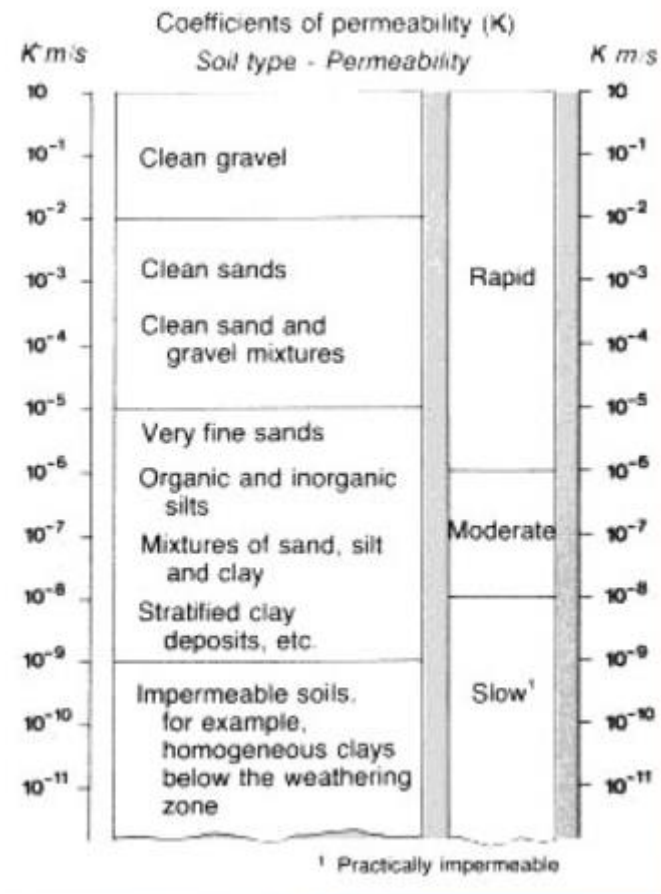
¹⁹ A mass mortality event in the previous year/cycle does not count towards improvement in the next year/cycle, as required in this indicator.



			mollusc systems	
2.6	See Appendix I, Section 1.5 - Tiered Sampling Approach Do you agree the number of samples for Tier 1 and Tier 2 are practical? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*	Feasibility	Farms with marine cages or suspended mollusc systems	Survey
2.6	Appendix I, Section 1.5 - Tiered Sampling Approach - A. Sampling Protocol – Marine Cage Systems The distances from the holding structures for the EQS monitoring zones are set at 30, 100, 150 and 500 metres. Do you agree these accurately reflect the spatial distribution of organic waste from the farm? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*	Approval	Environmental NGOs Academia Marine cage farms	Survey Workshop
2.6	Appendix I, Section 1.5 - Tiered Sampling Approach - A. Sampling Protocol – Suspended Marine Mollusc Systems. The distances for the EQS monitoring zones are set at 0 to 30 m inside the farm boundary and 10 to 30 m outside the farm boundary. Do you agree these accurately reflect the spatial distribution of organic waste from the farm? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*	Approval	Environmental NGOs Academia Farms with suspended mollusc systems	Survey Workshop
2.6	See Appendix I, Section 1.6 - User-defined monitoring program. Do you agree the requirements for the user-defined specific benthic monitoring program are clear and auditable? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*	Information	CABs Farms with marine cages or suspended mollusc systems	Survey 1:1 Workshop Pilots
2.6	See Appendix I, Section 1.7 - Standard Operating Procedures for the Field Analysis of Abiotic Indicators Employed in Tier 1 and Tier 2. Do you perceive any potential challenges with the use of the Sulfide UV methodology? Yes / No If Yes, please explain:*	Feasibility	Academia Regulators Farms with marine cages or suspended mollusc systems	Survey Pilots



2.6	<p>The Benthic Technical Working Group is recommending an approach similar to the one followed by the proposal for marine systems for freshwater systems that discharge into lakes and reservoirs. The approach incorporates:</p> <ul style="list-style-type: none"> • A tiered sampling and EQS classification; • Direct benthic monitoring; • The use of biotic and abiotic indicators. <p>Do you have any information or scientific references that ASC can review to further develop the approach for freshwater systems that discharge into lakes and reservoirs?</p>	Information	Academia Farms excluding marine cages or suspended mollusc systems	Survey
2.7	<p>See the blue box for criterion 2.7.</p> <p>Do you have any information or scientific references that ASC can review to further develop the recommendations for systems that discharge into lakes and reservoirs?</p>	Information	Academia; Government /Regulators; Environment al NGOs; Farms that operate in lakes and reservoirs	Survey 1:1
2.7	<p>Concerning the 'Proposal for a simple tool for assessing farm impacts on water quality': Do you have any information or scientific references that ASC can review to further develop the proposed tool?</p>	Information	Academia; Government /Regulators; Environment al NGOs; Farms that operate in lakes and reservoirs	Survey
2.8	<p>Do you agree with ASC defining highly permeable soil as having a K coefficient of 10^{-1} m/s - 10^{-8} m/s?</p> <p>ANSWER OPTIONS: Yes/No. + don't know / no opinion If no, "Please explain why:"*</p>	Approval	Environment al NGOs, academics, producers,	Survey Workshop



government
s, CAB

2.8	What methodology should ASC recommend in guidance for producers to determine soil permeability (cost effective, ease of use)	Information	Environmental NGOs, academics, producers, government s, CAB	Workshop
2.8	Do you agree that producers should be allowed to not use liners in naturally saline environments regardless of the permeability of the soil?	Approval	Environmental NGOs,	Workshop Survey



	ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*		academics, producers, governments	
2.8	To reduce plastic waste ASC would like to prohibit the use of plastic liners. Do you agree that this is feasible? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*	Feasibility	Environmental NGOs, academics, producers, governments	Survey Pilots Workshop
2.8	ASC would like to propose prohibiting the discharge of effluents over land since this can contribute to salinisation. Do you agree with this proposal? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. If you disagree / strongly disagree, please indicate why:*	Approval	Environmental NGOs, academics, producers, governments	Workshop Survey

2.9	<p>2.9.1 The UoC shall carry out an assessment, to identify and document the following:</p> <ul style="list-style-type: none"> • locations where biosolids accumulate and are removed • potential contamination of biosolids through salinity, disease, drug residues, residues of other hazardous waste¹ • when feeding is used: estimate concentration of key nutrients (Nitrogen, Phosphorus) • options for on-site containment of biosolids • anticipation of recurring extreme weather events which could impact on on-site containment measures • evaluate possibilities to prioritise re-use over disposal • any needs to dispose of biosolids off site <p>Do you agree that it is feasible for the UoC to estimate the key nutrient concentration (Nitrogen, Phosphorus) in the biosolids?</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you agree / strongly agree, please indicate why:*</p>	Feasibility	Farms CABs	Survey Pilots
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2.9	<p>2.9.2 When biosolids are re-used²⁰, the UoC shall only re-use uncontaminated biosolids (see 2.9.1), and only for the following purposes:</p> <ul style="list-style-type: none"> • use as fertilizers in agriculture • maintenance and building of dykes • maintenance of roads or infrastructure • biogas <p>Please provide any other responsible re-uses of uncontaminated biosolids which you think should be added to the list:</p>	Info	Farm Academics	Survey
2.9	What methods do you use for responsible re-use of your biosolids?	Info	Farm	Survey
2.9	Please provide any information/data/research you may possess on potential risks associated with antibiotic resistances building up due to re-use of biosolids	Info	Academics	Workshop, Survey
2.9	Do you know of an easy way producers can estimate key nutrients (Nitrogen and Phosphorus)?	Info	Academics	Workshop
2.9	Does ASC need to add other key nutrients (in addition to Nitrogen and Phosphorus)? Yes/No + don't know / no opinion If yes, please specify which nutrients you believe should be added:*	Info	Academics	Survey Workshop

2.10	<ol style="list-style-type: none"> 1. Does your production system require the addition of salt? (Y/N) 2. What is the annual/monthly/daily? change in salinity? (add scale options) 3. Do you utilize desalination systems prior to discharge? (Y/N) 	Info	Producers	Pilots
2.10	<p>Do you agree it is feasible for producers to get minimum vital flow information for their water source? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, what information would producers be able to provide that show they use water responsibly?*</p>	Feasibility / Info	Producers, Government s, CABs, Environmental NGOs, Academics	Survey

²⁰ this applies when biosolids are removed from e.g., culture systems, canals, treatment systems.



2.10	How often do measurements need to be conducted to determine that water is used responsibly (e.g., weekly, monthly, quarterly, annually)? Comment box + don't know / no opinion.	Information	Governments, Academics	Survey
2.10	Do you think there is value in mapping all users of water in an area to determine relative use by the UoC? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree If you agree / strongly agree, please indicate why:*	Agreement	Governments, Environmental NGOs, Academics	Workshop
2.10	Do you agree that measures to reduce water use and water wastage are necessary in areas where water is abundant? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree	Information	General	Survey

2.11	Are there particular barriers to gathering information on the types and volumes of energy used (e.g. litres of gasoline or kJ of electrical energy purchased from a supplier), for producers that have not previously needed to calculate and report energy use and/or GHG emissions? Yes/No + don't know / no opinion If Yes, please specify which barriers:*	Info Feasibility	Farms, CABs	Survey Workshop 1:1
2.11	2.11.2 The UoC shall annually calculate the quantity of GHG emissions produced, in kg CO ₂ -eq per tonne of farm-gate production, following the method outlined in Annex 2, including total emissions and emissions from each of: a) on-farm energy consumption, b) feed, and c) on-farm consumption of other inputs. Are there particular sources of GHG emissions relevant to aquaculture production that the combined considerations outlined above fail to address?(please note that land use change is covered elsewhere in the Farm and Feed Standards) ANSWER OPTIONS: Yes/No + don't know / no opinion If yes: please list those that you believe should be incorporated into the criterion's calculation and reporting requirements	Info and agreement	NGOs, Academia	Survey Workshop 1:1
2.11	2.11.3	Agreement	General	Survey Workshop 1:1



	<p>a) The UoC shall, where 2.11.1 and 2.11.2 indicate energy related values higher than the thresholds below in i. and ii., develop and implement an Energy Efficiency Management Plan (EEMP), including the improvement measures in b), c) and d):</p> <p>i. 1,300 MJ/t energy consumed per tonne of, farm-gate production, and</p> <p>ii. 100 kg CO₂-eq per tonne of farm-gate production from on-farm energy use.</p> <p>b) The UoC shall, as part of the EEMP, outline provisions to improve the efficiency of farm-gate production per unit of energy used and GHG emissions produced, in order to work towards 2.11.3 a).</p> <p>c) The UoC shall, as part of the EEMP, outline provisions to reduce the use of energy from non-renewable sources, in order to work towards 2.11.3 a).</p> <p>d) The UoC shall, as part of the EEMP, outline provisions to derive an increased proportion of energy from non-fossil fuel sources, in order to work towards 2.11.3 a).</p> <ul style="list-style-type: none"> Are there particular items or requirements that should be included to maximise the effectiveness of an EEMP? <p>ANSWER OPTIONS: Yes/No + don't know / no opinion If yes: please list those that you believe should be included</p>	Information		
2.11	<p>2.11.3 a) The UoC shall, where 2.11.1 and 2.11.2 indicate energy related values higher than the thresholds below in i. and ii., develop and implement an Energy Efficiency Management Plan (EEMP), including the improvement measures in b), c) and d):</p> <p>i. 1,300 MJ/t energy consumed per tonne of ²¹, farm-gate production, and</p> <p>ii. 100 kg CO₂-eq per tonne of ²², farm-gate production from on-farm energy use.</p> <p>2. Do you have suggestions for another basis for calculating energy performance that would be more adequate and/or more effective?</p> <p>ANSWER OPTIONS: Yes/No If yes: please provide your suggestions</p>	Feasibility	General CABs Scientists	Pilot Survey
2.12	<p>What challenges, if any, do you expect to encounter when implementing the requirement of tagging or marking aquaculture gear? Please explain:</p>	Feasibility	Farms	Pilots Workshops

²¹ Threshold for energy use is based on the median on-farm energy consumption per kg of live weight chicken as reported in 8 published life cycle assessments of conventional chicken production.

²² GHG threshold represents the equivalent quantity of energy multiplied by a direct GHG intensity factor for diesel (0.074 kg CO₂-eq/MJ).



2.12	What challenges, if any, do you expect to encounter when implementing the use of plastic retention devices at the effluent or farms discharge point? Please explain.	Feasibility	Farms	Pilots Workshops
2.12	Is it reasonable to require that farms contain hazardous materials to the extent that there would be no runoff during extreme weather events?	Feasibility	Farms	Pilots Workshops
2.12	2.12.5 The UoC shall hold effluents for at least 48h, or as per product specification (whichever is greater), after culture animals have been treated with hormones. Do you agree a 48-hour wait is the most appropriate process to ensure sufficient breakdown of active ingredients to avoid significant negative impact? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree: What other parameters or processes should be included?*	Info/Approval	Farms / Academia	Pilots Workshops Survey
2.12	2.12.6: The UoC shall only use net cleaning facilities which treat effluents, if nets are cleaned on land; effluent treatment includes the capturing of copper if copper treated nets are used. Should any biocides other than copper be included? ANSWER OPTIONS: Yes/No + don't know / no opinion If yes: please list those that you believe should be included	Info/Approval	Farms / Academia	Survey Pilots Workshops 1:1
2.12	2.12.8: The UoC shall not treat nets / other aquaculture gear / infrastructure with copper, or clean ²³ copper-treated nets ²⁴ / other aquaculture gear / infrastructure, in situ in the environment. Are there any situations in which it is not feasible to comply with this indicator? (e.g. spraying of infrastructure in cage structures/platforms) ANSWER OPTIONS: Yes/No + don't know / no opinion If yes: please list those situations	Feasibility	Farms / Academia CABs	Pilots Workshops 1:1

²³ Light cleaning of nets is allowed. Intent of the standard is that, for example, the high-pressure underwater washers could not be used on copper treated nets because of the risk of copper flaking off during this type of heavy or more thorough cleaning.

²⁴ Under the SAD, “copper-treated net” is defined as a net that has been treated with any copper-containing substance (such as a copper-based antifoulant) during the previous 18 months, or has not undergone thorough cleaning at a land-based facility since the last treatment. Farms that use nets that have, at some point prior in their lifespan, been treated with copper may still consider nets as untreated so long as sufficient time and cleaning has elapsed as in this definition. This will allow farms to move away from use of copper without immediately having to purchase all new nets.



2.12	2.12.19 The UoC shall not use single use plastics (SUPs) ²⁵ , unless sustainable alternatives are not available or affordable ²⁶ . Does the requirement that restricts the use of single use plastics impose a challenge according to your own circumstances. Please explain.	Feasibility	Farms	Survey; Pilots; Workshops
2.12	2.12.20: The UoC shall install, control and record plastic retention devices at the effluent or discharge point, to prevent contributing to marine litter. What kind of plastic retention devices do you know that succeed in preventing marine litter?	Information	Farms / Academia	Workshops Pilots Survey 1:1
2.12	2.12.22: The UoC shall dispose of waste ²⁷ responsibly, by using one of the following methods: i. Non-hazardous waste - disposal by incineration ²⁸ (with energy recovery) - disposal by incineration (without energy recovery) - disposal by landfilling ²⁹ ii. Chemical and hazardous waste - disposal of chemical and hazardous waste by professional contractor, after treatment ³⁰ and using the methods listed above What other means of disposing, apart from disposal by incineration and disposal by landfilling would you consider responsible and why?	Information	Farms Academia CABs Environmental NGOs	Survey Workshop Pilot 1:1

2.13	How many feed suppliers do you source from? From those, how many produce feed which meets current ASC farm standard requirements?	Info	Certified Farms	Survey Workshop 1:1 Pilots
2.13	How likely do you think it is that some farms may not be able to purchase ASC Feed as per the new Feed Standard? Link Feed Standard to: https://www.asc-aqua.org/what-we-do/our-standards/feed-standard/ ANSWER OPTIONS: very likely – likely – neither likely nor unlikely – unlikely – very unlikely + don't know / no opinion.	Info	Farms and feedmills	Survey Workshop 1:1 Pilots

²⁵ This shall include cotton bud sticks, cutlery, plates, straws, stirrers, and sticks for balloons, and should include cups, food and beverage containers made of expanded polystyrene, and on all products made of oxo-degradable plastic.

²⁶ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32019L0904&from=EN>

²⁷ Including biosolids, daily mortality removals and mass mortalities

²⁸ Incineration: see Definition List.

²⁹ Landfilling: see Definition List.

³⁰ Chemical and Hazardous waste may need prior/additional treatment, see 2.12.2 and 2.12.8.



<p>2.13</p>	<p>Indicator 2.13.2: The UoC shall only feed seaweed as a direct feed source which has been wild harvested from a regulated, well-managed resource or farmed under an ASC recognised certification scheme.</p> <p>How likely do you think it is that some farms may not be able to source seaweed which meets this requirement?</p> <p>ANSWER OPTIONS: very likely – likely – neither likely nor unlikely – unlikely – very unlikely + don't know / no opinion.</p>	<p>Info</p>	<p>Academia/Research CAB Environmental NGO Farm (Producer) Feed mill</p>	<p>Survey</p>
<p>2.13</p>	<p>2.13.6 The UoC shall not feed wet feedstuffs³¹ or moist pellets³², nor uncooked or unprocessed fish³³ to ASC certified production.</p> <p>Are you aware of any species which rely on feeding wet feedstuffs or moist pellets (2.13.6)? Yes / No + don't know / no opinion</p>	<p>Info</p>	<p>Farms and feedmills, academics, environmental NGOs, CABs</p>	<p>Survey</p>

<p>2.14</p>	<p><i>Indicator scope: finfish only</i></p> <p>Indicator 2.14.1: The UoC shall vaccinate finfish for all regionally-relevant diseases for which an effective vaccine exists.</p> <p>It is feasible to vaccinate finfish for all regionally-relevant diseases for which an effective vaccine exists. <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion.</p> <p>If disagree / strongly disagree, please explain why:*</p>	<p>Feasibility</p>	<p>Academia/Research; Finfish Farms (Producers); Veterinarians; Environmental NGOs</p>	<p>Workshop Pilots 1:1</p>
<p>2.14</p>	<p><i>Indicator scope: finfish only</i></p>	<p>Approval</p>	<p>Academia/Research; Finfish</p>	<p>Survey 1:1</p>

³¹ **Wet feed:** See Definition List.

³² **Moist pellets:** See Definition List.

³³ **Uncooked or unprocessed fish:** See Definition List.



	<p>Indicator 2.14.1: The UoC shall vaccinate finfish for all regionally-relevant diseases for which an effective vaccine exists</p> <p>Do you think there should be an exception for smallholders/extensive farming UoC's to comply with 2.14.1? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree If you agree / strongly agree, please indicate why:*</p>		<p>Farms (Producers); Intergov. Orgs; Veterinarians; Environmental NGOs</p>	
2.14	<p><i>Indicator scope: salmon only</i></p> <p>Indicator 2.14.2: The UoC shall, when stocking an individual site, only stock single year class fish.</p> <p>Which species other than salmon should this indicator apply to?</p>	Information	<p>Producers, CABs, Environmental NGOs</p>	Survey
2.14	<p><i>Indicator scope: finfish only</i></p> <p>Indicator 2.14.3: The UoC shall regularly remove mortalities and moribund animals and dispose of mortalities responsibly; responsible disposal mechanisms are listed in 2.12 Material use, Waste and Pollution.</p> <p>Do you agree it is feasible to regularly remove mortalities and moribund animals and dispose of mortalities responsibly. <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion If disagree / strongly disagree, please explain why:*</p>	Feasibility	<p>Academia/Research; Finfish Farms (Producers); Intergov. Orgs; Veterinarians; Environmental NGOs</p>	Workshop; 1:1 Pilots
2.14	<p><i>Indicator scope: finfish only</i></p> <p>Indicator 2.14.3: The UoC shall regularly remove mortalities and moribund animals and dispose of mortalities responsibly; responsible disposal mechanisms are listed in 2.12 Material use, Waste and Pollution.</p> <p>For which species other than finfish would this indicator be relevant?</p>	Information	<p>Academia/Research; Farms (Producers); Intergov. Orgs; Veterinarians; Environmental NGOs</p>	Survey
2.14	<p><i>Indicator scope: finfish only</i></p> <p>Indicator 2.14.3: The UoC shall regularly remove mortalities and moribund animals and dispose of mortalities responsibly; responsible disposal mechanisms are listed in 2.12 Material use, Waste and Pollution.</p>	Information	<p>Academia/Research; Farms (Producers);</p>	Survey



	<p>Are there any culture systems/life stages, where removal of mortalities is not feasible/not necessary? Yes / No + don't know / no opinion If yes, please explain:</p>		Intergov. Orgs; Veterinarians	
2.14	<p>Indicator 2.14.4: The UoC shall adhere to species-specific limits on mortality rates (Annex 1).</p> <p>Do you think that extensive production should be fully excluded from this indicator (regarding feasibility)? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree</p> <p>Do you think there should be moderately reduced requirements for extensive producers? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree</p>	Approval	Academia/Research; Farms (Producers); Intergov. Orgs; Veterinarians; Environmental NGOs	Survey Pilots
2.14	<p>Indicator 2.14.12: The UoC shall maintain prescriptions for each application of therapeutants³⁴, including the following minimum information:</p> <ul style="list-style-type: none"> – diagnosis – etiology – purpose of use – product name, active ingredient and species to be treated – life stage of species to be vaccinated/treated – dose – duration or repetition of vaccination – administration method – minimum withdraw period – categorization of active ingredient according to the WHO List of Critically Important Antimicrobials for Human Medicine – antimicrobial susceptibility tests results, either prior or as post-treatment, as confirmatory alternatives strategies explored to the prescribed antimicrobial treatment. <p>Is there any other minimum information required for the therapeutants prescriptions not already listed in the proposed indicator? Please clarify.</p>	Approval	Academia/Research; Farms (Producers); Intergov. Orgs; Veterinarians; Environmental NGOs	Survey Pilots

³⁴ This includes applications of antibiotics, parasiticides, antifungal, antiviral, hormones, anaesthetics, and vaccines.



2.15	<p>Indicator 2.15.4 - <i>Indicator scope: UoCs using parasiticides</i></p> <p>The UoC shall monitor parasiticide residue levels annually in the benthic sediment directly outside the AZE³⁵.</p> <p>Do you agree it is feasible to monitor parasiticide residue levels in the benthic sediment? <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Feasibility	Farms Academia	Survey Pilots
2.15	<p>Should ASC consider all types of parasiticides (e.g. including oral and bath)?</p> <p>Answer options: Yes / No + don't know / no opinion</p> <p>If No, please explain why:*</p>	Information	Academia/Research; Farms (Producers); Veterinarians; Environmental NGOs	Survey
2.15	<p>Indicator 2.15.9 - The UoC shall apply treatment rotation^{36 37}, providing that the farm has >1 effective parasiticide available, with every third treatment.</p> <p>Do you agree it is feasible to apply treatment rotation, providing that the farm has >1 effective parasiticide available, with every third treatment? <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Feasibility	Academia/Research; Farms (Producers); Veterinarians; Environmental NGOs	Survey Pilots
2.15-x	<p>C. Requirements on sampling protocols</p> <p>1) <u>Frequency:</u> Weekly sampling during the sensitive period. Monthly sampling the rest of the year.</p>	Information	Salmon farms;	Survey Pilots Workshop

³⁵ ASC guidance on the actual collection/sampling and analysis regarding parasiticide residue levels is pending. Until this guidance is available, compliance with the indicator is not required and auditors shall treat this indicator as non-applicable in the Audit Report. The guidance, when published, will establish the effective implementation date for this indicator (see also QA0111).

³⁶ This is in addition to, and independent of, the susceptibility test outcome in 2.15.6 or the bio-assay analysis outcome in 2.15.8.

³⁷ In the context of this criterion, treatment rotation means using an active ingredient belonging to a different family of parasiticides.



	<p>2) <u>Number of cages</u>: At least 50% of cages shall be sampled over a 2-week period, with the entire farm sampled over at least a 6-week period.</p> <p>3) <u>Number of fish per cage</u>: A minimum of 10 fish per cage should be sampled.</p> <p>4) <u>Sea lice stage</u>: At a minimum provide data on mobiles³⁸ and adult females</p> <p>Do you know of any jurisdictions or types of farms for which the implementation of the proposed requirement on sampling protocols will be challenging? Answer options: Yes / No If Yes, please explain the circumstances and the challenges:</p>		Government ; Academia/Research; Veterinarians; Environmental NGOs	1:1
2.15-x	<p><u>Fish welfare (exemption from sampling)</u>: The veterinarian or fish health professional may exempt fish from being sampled during a certain period of time within the sensitive period. The reason for the exemption shall be documented. Grounds for exemption may include:</p> <ul style="list-style-type: none"> • Immediately after smolting and stocking. • Undergoing a disease event and/or being treated (including treatment for sea lice). In case the reason for the exemption is related to fish treatment, the maximum duration for the exemption shall be 2 weeks. • During specific environmental events (e.g.: water temperature [i.e., below 4°C], low oxygen, algal bloom, jellyfish event). <p>If you would like to propose other potential reasons for exemption from sampling, please list them here:</p>	Information	Academia/Research; Salmon Farms; Veterinarians; Environmental NGOs	Survey Pilots
2.15-x	<p>Do you have additional information or scientific references that ASC can review to support or refine the recommendation on setting a regionally relevant lice level (in the context that, as starting place, ASC will use the lowest action/trigger level in jurisdictions today). We refer ASC here to our input submitted to the revision of the sea lice indicator, as these points still stand. In particular, ASC must go beyond regulation to be considered a robust and meaningful certification standard.</p>	Information	Government ; Academia; Salmon producers; Environmental NGOs	Survey 1:1
2.15-x	<p>2.15.20 The UoC shall maintain on-farm sea lice levels during the sensitive period below the thresholds, or in case of exceeding those thresholds reduce levels below the thresholds within [TBD] days upon exceedance, as outlined in Appendix XX “Sea Lice Thresholds for Sensitive Periods”.</p> <p>What timeline would you propose to allow, for bringing the sea lice level below the maximum threshold? [Text box] + don't know / no opinion 7 days.</p>	Feasibility	Salmon producers; Environmental NGOs	Pilots Survey

³⁸ Pre-adult and adult sea lice males.



2.15-x	<p>Appendix XX includes: The veterinarian or fish health professional may exempt fish from being treated and, therefore, the ability to reduce the on-farm sea lice levels below the threshold within [TBD] days upon exceedance, during a certain period of time within the sensitive period if local regulations permit. The reason for the exemption shall be documented. Grounds for exemption may include: specific environmental events (extreme weather event, water temperature [i.e. below 4°C], low oxygen, algal bloom, jellyfish event), unforeseen increases in on-farm lice levels, documented logistical roadblocks or delays for implementing treatment.</p> <p>If you would like to propose any additional special circumstances under which the allowed timeline for exceeding the maximum threshold should be extended, please list them here:</p>	Information	Salmon producers; Environmental NGOs	Pilots Survey
2.16	<p>ASC proposes to not allow Critically Important Antibiotics on ASC labelled products. Do you agree with this? Answer options: strongly agree – agree – neutral – disagree – strongly disagree Please indicate why:*</p>	Approval	General	Survey Workshop 1:1
2.16	<p>ASC proposes to require an overtime reduction in the total antibiotic load. This would be a new requirement for all ASC certified farms. Do you agree with this requirement? Answer options: strongly agree – agree – neutral – disagree – strongly disagree Please indicate why:*</p>	Approval	General	Survey Workshop 1:1
2.17	<p>ASC aims to address the impact of pre-Grow Out sites (e.g. hatcheries) using the same indicators as for Grow Out sites. Do you agree this aim is feasible? <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion If disagree / strongly disagree, please explain why:*</p>	Feasibility	Producers, CABs, Environmental NGOs	Survey Workshop 1:1 Pilots
2.17	<p>Does the proposal close current “gaps” in standard application, ensuring all elements of production are considered?</p>	Approval	Environmental NGOs	Workshop 1:1
2.17	<p>Which option do you prefer to verify compliance of the pre-Grow Out sites?</p> <ul style="list-style-type: none"> Option 1: on-site inspections of the pre-Grow Out sites by a qualified internal auditor from the UoC, using the ASC inspection template, reviewed by the CAB during the UoC audit with spot-checks as necessary by third-party auditors of intermediate sites in salmon production Option 2: on-site audits by third party CAB auditors or by UoC auditors with equivalent qualifications <p>Other - please specify:</p>	Approval	Producers, CABs, Environmental NGOs	Survey Workshop 1:1 Pilots



2.17	<p>This proposal separates production into “pre-growout” and “growout”, with the growout phase comprising the site of audit, or the UoA. For finfish, the “pre-growout” phase will include any sites used prior to the harvest site (e.g. hatchery site, intermediate site or holding site). Shrimp will include any production units holding shrimp from PL25 onwards. Abalone and bivalve will include any sites from the point of translocation onwards. Do you agree these definitions adequately cover the sites used and potential impacts as intended?</p> <p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don’t know / no opinion</p> <p>If disagree / strongly disagree, please explain why:* Please outline any other considerations you believe are required (e.g. applicability for smaller sites).</p>	Approval	Producers, CABs, Environmental NGOs, Academics	Survey Workshop 1:1 Pilots
2.17	<p>ASC suggests that the requirement to use ASC compliant feed from ASC certified feed mills applies from first feeding with pellets onwards. In other words, when no feed is used, live feed is used, crumble/granulates/micro-pellets <1.5mm or seaweed is used, the requirement to use ASC compliant feed does not apply. Is this a feasible balance between having robust feed requirements for the far majority of feed quantity but allowing some flexibility for very early stage feeding for which there is much less flexibility/options of sourcing?</p>	Feasibility	Producers, Feed mills	Workshop Pilots
3.1	<p>Indicators 3.1.5 – 3.1.8 specify requirements for medical testing. Could these indicators give license to a UoC to conduct medical testing, if they hadn’t considered it previously? ANSWER OPTIONS: Yes/No Please explain how:</p>	Approval	CABs	Survey
3.1	<p>Indicator 3.1.5 During the recruitment process, the UoC, or if applicable the agency(ies) involved in recruitment shall not require medical tests, unless required for the function of the job. Is there any reason why medical testing should be used for recruitment? ANSWER OPTIONS: Yes/No</p>	Approval	General	Survey
3.2	<p>The Standard does not currently provide a timeline for remediation apart from the 90-day timeline required for closure of a corrective action. The Standard should include a separate timeline for remediation for forced labour.</p>	Approval	Social NGO, academics	Survey



	ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If agree / strongly agree, please explain why and what you believe the timeline should be:*			
3.2	Indicator 3.2.1 is classified as “critical indicator”. This means that any non-compliance on this indicator would: a) Trigger a critical non-compliance, which is an appropriate measure given that the severity of the issue addressed in the indicator; b) Trigger the subsequent remediation indicator (3.2.2). Do you agree with the classification of indicator 3.2.1 as “critical indicator”. ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. If strongly disagree / disagree, please explain why:*	Approval	General	Survey Workshop 1:1
3.3	Indicator 3.3.5: The UoC may employ children aged 13 and 14 years old, to conduct light work only, but shall make sure that: - The child receives appropriate training prior to work; - The child receives appropriate supervision; - It does not jeopardise schooling. This indicator is consistent with ILO standards and the prohibition against child labour. ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If disagree / strongly disagree, please explain why:*	Approval	Social NGO, academics	Survey
3.3	The ILO (and some countries) permit children aged 13 and 14 to conduct light work. Should the ASC standard permit children of this age to be employed in light work on the farms, or should this requirement be restricted to work on family farms only? Option 1. The ASC standard should permit children of this age to be employed in light work on the farms Option 2. The ASC standard should only permit children of this age to work at family farms Other - please specify (Note, for workshop: are we driving them away from school, or are we driving them towards a system of regulation and protection?)	Approval	Producers, CABs, Retail/Brands, Social NGOs, Academics	Survey Workshop 1:1
3.3	Indicator 3.3.1) is classified as “critical indicator”. This means that any non-compliance on this indicator would:	Approval	General	Survey Workshop?



	<p>a) Trigger a critical non-compliance, which is an appropriate measure given the severity of the issue addressed in the indicator;</p> <p>b) Trigger the subsequent remediation indicator (3.3.2).</p> <p>Do you agree with the classification of indicator 3.3.2 as “critical indicator”.</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree.</p> <p>If strongly disagree / disagree, please explain why:*</p>			1:1
3.5	<p>The Standard requires that no medical tests (that are not mandatory by the regulatory labour agency should be carried out as part of the recruitment process. Are there cases or situations where this would need to take place?</p> <p><u>Answer options</u> Yes /No</p> <p>If yes, what would these situations be?*</p>	Information	Producers	Survey
3.5	<p>Indicator 3.5.8 - Where not provided by a Regulatory agency State/National social security/health system, the UoC shall provide and pay for insurance³⁹ for all employees for work-related accidents or injuries; this includes as a minimum the cost for transport and medical treatment/medication needed to treat the accident or injury, the cost for transport and medical treatment/medication needed for recovery, compensation for lost working hours, as well as the cost for any required repatriation in case of migrant workers.</p> <p>Do you agree indicator 3.5.8 (on insurance) is financially feasible for farms?</p> <p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Feasibility	Producers (both Large and SMEs), Social NGOs	Survey Workshop 1:1
3.5	<p>Indicator 3.5.10 - The UoC shall provide access to adequate and clean sanitary facilities, with adequate privacy, which includes separation by gender if required.</p> <p>Should ‘adequate and clean sanitary facilities’ be more clearly defined? (e.g., include correct and safe disposal of waste or running water)</p> <p>Yes/No</p> <p>If yes, please provide suggestions for what this definition should include:*</p>	Approval	Producers (both Large and SMEs), Retail/Brands, Social NGOs	Survey Workshop 1:1

³⁹ Where no suitable insurance is available, the UoC may have a system to cover these costs directly.



3.7	<p>Indicator 3.7.1 - The UoC shall ensure that all employees have received, understood and agreed upon, written and understandable information about their employment terms and conditions before starting employment and where applicable prior to migration. This information shall include, at a minimum:</p> <ul style="list-style-type: none"> • a description of the role and any responsibilities, • the type of contract (e.g. permanent, fixed-term, contractor), • working hours, including allowance for breaks, • paid annual leave and allowance for days off on public holidays, • sick leave, • wages, • any agreed wage deductions (e.g. accommodation, meals), • compensation for overtime, • social benefits (e.g. insurances), • termination terms and conditions; notice period, • access to relevant human rights and labour-related policies • access to information on labour rights as per 1.1.3. <p>It is feasible for migrant workers to receive written and understandable information about their employment terms and conditions prior to migration. <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Feasibility	Producers (both Large and SMEs), Social NGOs, Academics	Survey Workshop 1:1
3.7	<p>Definition of Labour-only contracting arrangements: The practice of hiring employees without establishing a formal employment relationship for the purpose of avoiding payment of regular wages or the provision of legally required benefits, such as health and safety protections.</p> <p>Do you think it is always feasible to restrict the use of labour-only contracting? <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Feasibility	Producers (both Large and SMEs), Social NGOs, Academics	Survey Workshop 1:1
3.7	<p>Do you think there are contexts in which it is appropriate to allow sub-contracting employees to avoid labour liabilities? Do you think it is always feasible to restrict the use of labour-only contracting?</p>	Approval / information	General	Survey Workshop 1:1



	<p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If agree / strongly agree, please specify which contexts you meant:*</p>			
3.9	<p>Indicator 3.9.1 - The UoC shall keep records of the hours worked by every employee. These records shall be validated / verified by the employees.</p> <p>Is it necessary that employees validate / verify records of hours worked, or is the record itself sufficient?</p> <p><u>Option 1:</u> The employee must validate or verify <u>Option 2:</u> The record suffices <u>Option 3:</u> Don't know / no opinion</p> <p>Please explain why</p>	Approval / information	Producers (both Large and SMEs), Social NGOs, Academics	Survey Workshop 1:1
3.9	<p>Indicator 3.9.3 - The UoC shall ensure that overtime hours are voluntary, occur only under exceptional circumstances and are not requested regularly.</p> <p>Overtime should be requested of employees only under 'exceptional circumstances' and is not appropriate under normal circumstances.</p> <p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Approval	Producers (both Large and SMEs), Social NGOs, Academics	Survey Workshop 1:1
3.12	<p>Annex 5, Table 1, Grievance Mechanism Requirements no. 3 - All grievances shall be addressed within a 90-day timeframe of submission.</p> <p>Do you agree 90 days is a feasible timeframe for remediation?</p> <p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Feasibility	Producers (both Large and SMEs), Social NGOs, Academics	Survey Workshop 1:1



3.13	<p>In a previous draft of this Standard, there were two criteria on this subject, one on Communities and one on Indigenous and tribal peoples. In order to avoid repetition in the Standard, this version has just one Criterion on Community Engagement, which includes two indicators that are specifically focused on Indigenous and tribal peoples, although they are named in each indicator.</p> <p>Do you agree that having just one Criterion for communities, which includes both the local communities and Indigenous and tribal peoples in this Criterion is sufficient and appropriate?</p> <p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree</p> <p>If disagree / strongly disagree, please explain why:*</p>	Approval	Social NGOs, Academics	Survey
3.13	<p>Indicator 3.13.4 - The UoC shall be able to demonstrate the right to use the land and water. Where there is a transfer of ownership or usage of land from local people, Indigenous and tribal peoples or other stakeholders to the UoC, such transfer shall be carried out through consultations with these populations.</p> <p>ASC has not yet included rigorous indicators and process around Free, Prior and Informed Consent (FPIC) in the standard. Do you think indicator 3.13.4 is adequate, including guidance that notes that best practice is to use an FPIC process?</p> <p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Approval	Producers (both Large and SMEs), Social NGOs, Academics	Survey Workshop 1:1

RMF	<p>Do you think the concept of risk management as laid out in the Risk Management Framework (RMF) is in line with scientific advice?</p> <p><u>ANSWER OPTIONS:</u> strongly agree – agree – neutral – disagree – strongly disagree</p> <p>If disagree / strongly disagree, please explain why:*</p>	Approval / Information	Academics	Survey
RMF	Please indicate any relevant scientific advice we should be aware of:	Information	Academics	Survey
RMF	Do you think the concept of risk management as laid out in the Risk Management Framework (RMF) is in line with best practice in risk management?	Approval	General	Survey Workshop



	ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree If disagree / strongly disagree, please explain why:*			
RMF	Which potential unintended negative consequences of using this tool do you foresee, if any?	Information	General	Survey

Final questions

1. Farm Standard Scope – any comments?
2. The proposed standard encompasses all relevant aquaculture sustainability topics. Scale: 1 – 5 (strongly disagree – strongly agree)
 - a. If disagree / strongly disagree: what topic do you think is missing?
 - b. Why do you think this topic should be added?
3. Annex 1 Species performance levels – Do you have any comments?
4. Annex 2 Data recording and submissions Concept text – Do you have any comments?
5. Annex 6 List of Acronyms, Definitions and Verbal Forms used – Do you find that any definitions are unclear or missing? Yes/No; If yes, please specify: There are two definitions very similar; 'Chronic leakage' and 'Leakage escape' that should be refined – in our opinion the 'Chronic leakage' definition is better.
6. The proposed standard overall is understandable to me. Scale: 1 – 5 (strongly disagree – strongly agree) Agree, but see comment below.
7. Are there any other general comments on the proposed standard that you were unable to insert in previous sections? We would caution against too many supporting documents which can make the Standard more difficult to understand. Additionally, for any requirement relating to public disclosure, the information should be made available for the lifetime of the certification.
8. The proposed Farm Standard has my support. Scale: 1 – 5 (strongly disagree – strongly agree)
9. Do you want to stay informed with our latest programme updates? Subscribe to our newsletters:
 - a. ASC Global newsletter
 - b. Global certification update



- c. ASC France newsletter
- d. ASC DACH newsletter
- e. ASC Japan newsletter
- f. ASC US newsletter
- g. ASC Australia newsletter
- h. CABs newsletter

10. *For producers:* I would like to volunteer to pilot the Farm Standard in the period September 2022 – March 2023.