

Ref.	Sector	Comment in detail	Rationale	Proposed change	Consultation Feedback	Updated response from the ASC
2	Non-industry	Improve consistency (with Salmon and Shrimp standard) of environmental impact assessment	No requirement on EIA available. Specific indicators that set environmental limits regarding impact on wildlife and the ecosystem are too limited	INDICATOR: Evidence that a Biodiversity-focused (Environmental) Impact Assessment (EIA) and energy use assessment (both of non-specific origin) has been carried out. REQUIREMENT: YES INDICATOR: Evidence for a proactive consultation with indigenous communities and granted access to vital community resources (freshwater, land or other natural resources that communities rely on for their livelihood) with a respective impact assessment. REQUIREMENT: YES	Second consultation	We are addressing this in the harmonisation project and hope to initiate a common approach across standards.
2.1.1	Non-industry	Comment on farm location and pond management	2.1.1 Farm located in approved aquaculture development areas. Also applies to 2.2.1 and 2.2.2	review to ensure that they reflect that Pangasius is not only farmed in Vietnam.	First consultation	To be included in the operational review, Item 7.
2.2.1	Non-industry	Seafood Watch fully supports the change from a rolling 10 year mark to the proposed "After May 1999" language			Second consultation	Proposed change Item 10
2.2.2	Non-industry	Comment on contribution of at least USD 0.50 per ton fish produced to the environment	2.2.2 Evidence that a contribution of at least USD \$0.50 per ton of fish produced has been paid to the environmental and social restoration fund annually	Assess whether this criterion needs to be revised or removed. What is the status of this fund?	First consultation	There has been no decision taken yet on the status of the restoration fund. This will be resolved during the harmonisation project and until then text has been added to clarify the purpose. Item 10.
2.2.3	Non-industry	Comment on indicator of no negative impact and no discharging of earth	It is difficult to provide evidence of absence: i.e., to provide evidence of no negative impacts on endangered species and no discharge of earth into water bodies. 2.2.3 Evidence that no earth has been discharged into common water bodies. Also applies to 2.2.4	Consider revising language	First consultation	Language updated, Item 8
3.2.1	Non-industry	Comment on diurnal oxygen demand		Reassess to ensure that sufficient evidence exists to support that the indicator and performance metric are effective means of achieving the desired objective of limiting eutrophication.	First consultation	More information needed in order to revise the metric, Item 16. Consultation has been requested in the paper.
3.1.3 & 3.1.4	Industry	Review of the TN test method (Kjeldahl and Indo-phenol blue) and TP (Kjeldahl and Ascorbic Acid). Main ISO 17025 certified laboratory in Vietnam, they don't apply the methods above. Currently in Vietnam they are applying these methods: - Method of analysis according to ISO 6638 TN: 2000 - TP analysis method by: 8190 method of its machines HACH DR5000 been accredited by the US Environmental Departments /and TCVN 6202: 2008. We suggest that ASC don't mention exactly analysis method in the standards.			Second consultation	Proposed to accept equivalent methods, Item 13.
3.5	Non-industry	Improve consistency (with Salmon, trout and shrimp standard) of waste discharge	proper disposal measures only in regard to organic wastes (sludge). No adequate management system for non-biological waste.	Evidence that non-biological waste (including net pens) from grow-out site is either disposed of properly or recycled	Second consultation	We are addressing this in the harmonisation project and hope to initiate a common approach across standards.
3.6	Non-industry	Remove ambiguity on energy consumptive data collection	only requires the collection of energy consumption data, imprecise definition of scope	All energy consumption on the farm (including electric power and fuels) must be considered. Evidence of an energy use assessment of on-farm energy consumption, measured in kilojoule/mt fish/year	Second consultation	An update has been suggested to harmonise the means of recording energy, Item 12. More information is required in order to set a metric limit, consultation has been requested in the paper.
3.6.1	Non-industry	Comment on energy consumption		assess energy consumption data collected from audited farms to determine if there is sufficient data to set energy use performance requirements.	First consultation	An update has been suggested to harmonise the means of recording energy, Item 12. More information is required in order to set a metric limit, consultation has been requested in the paper.
4.1.3	Non-industry	Comment on evidence that the species cannot establish in the river basin	It is difficult, if not impossible, to provide conclusive evidence that a species cannot become established. 4.1.3 If the species is not indigenous and does not have a self-recruiting stock established, evidence that the species cannot establish in the river basin. NOTE: Peer-reviewed publication in a reputable journal is required as evidence that the species cannot be established	Revise	First consultation	To be included in the operational review, Item 17. More consultation requested.

4.1.3	Non-industry	Suggestion to base this on whether the same or similar species have become ecologically established in similar ecosystems elsewhere. Well understood that this is imperfect, and is a risk-based (potentially difficult to audit) option!			Second consultation	To be included in the operational review, Item 17. More consultation requested.
4.5	Non-industry	Comment on escapees		Consider adding a limit on the number of escapes to help reduce the risk of catastrophic escapes and to provide consistency with other standards.	First consultation	To be included in the operational review, Item 17. More consultation requested.
4.5	Non-industry	Seafood Watch supports the idea of adding a limit to the number of escapees, however recognizes that counting methods include a degree of inaccuracy. This should be accounted for if an indicator is developed to address escapee limits.	Seafood Watch supports the intent of the proposed indicator, but as with the benchmark of the ASC Salmon Standard against the Seafood Watch Aquaculture Standard, it must be noted that there is a degree of inaccuracy associated with counting of escapees. With error margins too big, large numbers of escapees can go unaccounted for.		Second consultation	To be included in the operational review, Item 17. More consultation requested.
5	Non-industry	Improve consistency (with salmon, trout and seriola and cobia standard) of feed requirements on GMO transparency	It is included in ASC standards for salmon, trout and seriola.	Disclosure of feed supplier and by the farm to the direct purchaser if more than 1 percent transgenic plant material is being used in feed.	Second consultation	Agree to include, will drafted proposals for public consultation, item 14.
6.1.1 & 6.5.1	Industry	The fact that, these rates depend on the stocking size and market fish size. If we stock smaller fingerling size, we can't achieve these parameters. ASC standard focus on the environment and the standard already mentioned the deadfish management. So, we suggest that ASC don't require exactly rate in ASC standard.			Second consultation	Item 20. The ASC would like to maintain the rigour of its standards but can review metric requirements based on new scientific information. References are needed for the proposed growth rates.
6.5.2	Industry	Vietnamese Government actually they permit to stock more than 40 fish/m ² ; this parameter was suitable for 10 years ago. In the past, farmer stocked bigger fingerling size than now. In addition, feed quality and farming technique was improved and constantly improved. We suggest that we don't require exactly number in ASC standard.			Second consultation	Item 20. The ASC would like to maintain the rigour of its standards but can review metric requirements based on new scientific information. References are needed for the proposed growth rates.
6.5	Non-industry	Is 6.5.1 necessary given Criterion 6.1.1 (maximum average real percentage mortality) or do they constitute "double accounting"?	6.1.1 Maximum average real percentage mortality, from stocking to harvest, during the grow-out period (See Real Percent Mortality formula in Annex D). Req - 20% 6.5.1 Minimum average growth rate 3.85 g/day/fish	Assess whether these indicators are appropriate.	First consultation	Item 20. The ASC would like to maintain the rigour of its standards but can review metric requirements based on new scientific information. References are needed for the proposed growth rates.
6.2.8	Industry	According to the original ASC standards for Pangasius, we found that farmer can control the antibiotic residue in fish fillet and also don't use the antibiotic critical for human. Pangasius use antibiotic less than the other species. Actually, in Vietnam vaccine applied for pangasius have just started and have not had the good results as compared of Salmon industry. If ASC require this criteria, ASC can require in at least 5 years later.			Second consultation	Added an option for a 2-year implementation period to take into account stakeholder comments, Item 1.
6.2.8	Non-industry	Seafood Watch fully supports the proposed limit of ≤3 antibiotic treatments per production cycle	This limit will allow consistent scoring between the benchmarks of the ASC Salmon Standard and the ASC Pangasius Standard against the Seafood Watch Aquaculture Standard		Second consultation	Item 1. Maximum of three treatments per cycle has been proposed as an option in the standard.
6.5	Non-industry	Add basic provisions for fish welfare	very limited consideration of fish welfare, no measures for suitable culture environment, no slaughter technique defined	1. The standard includes provisions that require the farmer to maintain a suitable culture environment; including specific metrics (water temperature and sufficient water quality criteria). 2. The standard foresees husbandry systems allowing expression of natural behaviour and minimizing stress. Physical disfigurement of cultured species shall not be allowed. 3. Standard foresees upon harvesting appropriate and instant killing procedures resulting in no further harm and suffering of the animals safeguarding ethical and animal welfare values.	Second consultation	The ASC does not currently include animal welfare specifically in its mission. There are however a number of indicators that contribute to better husbandry and so will assure fish welfare. Item 21.
7	Non-industry	Improve consistency (with salmon and trout standard) on social welfare standards	Social requirements do not ask for evidence and documentation of compliance. No training procedures available, only awareness	e.g. Evidence of a policy to ensure social compliance of its suppliers and contractors [100%] e.g. Percentage of workers trained in health and safety practices, procedures and policies on a yearly basis[100%]	Second consultation	Item 18. : ASC agrees that requirements should focus on outputs and it is the intention to coordinate this point among all ASC standards during the alignment project.

7	Non-industry	Improve consistency (with salmon standard) of social welfare and add indicator on community access to natural resources	community access to natural resources must be granted	There must be a proactive consultation with indigenous communities and access to vital community resources (freshwater, land or other natural resources that communities rely on for their livelihood) must not be restricted and companies shall have a respective impact assessment.	Second consultation	Proposals included in the paper, item 15.
Audit Manual	Non-industry	Review audit manual.	While auditors state whether requirements are met, often they do not provide the underlying data. Such data can be used to help assess the appropriateness of the performance metrics	Consider adding requirements for the collection and inclusion of performance data in the audit reports or some other accessible database	First consultation	The audit manual will be updated once the standard review has been finalised.
N/A	Non-industry	Comment on effective hatchery practices		Add requirements related to effective hatchery practices (i.e., escapes, chemical use, broodstock collection and management).	First consultation	Item 19. Given the fact that hatcheries are dealt with differently across the ASC's species' standards, this should be harmonised to the extent possible and included as part of the alignment project.