

Haarlem, 31<sup>st</sup> of August 2018

Subject: Response to the Anderson Cabot Center for Ocean Life at the New England Aquarium

Matthew Thompson  
Anderson Cabot Center for Ocean Life  
New England Aquarium  
Central Wharf, Boston, MA 02110 USA

Dear Matt,

Many thanks for taking the time to provide your comments on the GSSI Benchmark Report for the ASC Salmon Standard.

GSSI is committed to a transparent benchmark process with opportunity for engagement and comments. Following the consultation, GSSI's detailed response to your comments by component number raised in relation to the GSSI Benchmark of the ASC Salmon Standard is set out below.

## **Section A - Governance**

### **Essential Component A.3.06**

**The Scheme Owner strives for consensus decisions on the content of the standard. Where consensus cannot be achieved, the Scheme Owner defines criteria in advance to determine when alternative decision-making procedures should come into effect and what the decision-making thresholds will be.**

**Anderson Cabot Center comment:** ASC is not in compliance with this Essential Component due to a lack of defined (in advance) alternative decision-making procedures or decision-making thresholds as these are not stated in the ASC standard-setting documents. Evidence provided by GSSI is not suitable or sufficient, for example the TAG is not a standard-setting body within ASC thus it's TOR are not relevant to the Essential Component, the feed standard is not being benchmarked, as such the TOR for that standard is not suitable for the salmon standard (no salmon standard TOR was found on the ASC website).

**GSSI response:** ASC is in alignment with Essential Component A.3.06. Based on the comment of ACC, additional evidence has been included in the final conclusion.

The Supervisory Board (SB) is the ultimate decision-making body of the ASC and approves the final version of any standards newly developed or revised, based on recommendations of the Technical and Stakeholder advisory groups. There is clear evidence of consensus decision making for the Supervisory Board which is defined within the ASC Standard Setting Procedure (ref ASC Standard Setting Procedure v1.0 Nov 2014, section 6.6, page 4 and section 8.11.1, page 12).

The Deed Stichting ASC Foundation 2011, Article 14, Page 8, Points 4,5,6,7 and 8 confirm voting processes and limitations. Further evidence has been provided and the IE was provided with Minutes of the Supervisory Board Meeting No 34, 18th and 19th April 2018 where there is clear evidence of voting on several decisions within the meeting.

With the provision of the request for further advice to the Supervisory Board, as defined within the ASC Standard Setting Procedure v1.0 Nov 2014, it can be concluded that an alternative decision-making process is in place which

will allow further deliberation before a final decision is taken. The IE was provided with recent evidence with confirmation of the minutes of the TAG meeting No 11 in December 2017, on PTI discussion/revision of the salmon standard, the TAG did vote as part of the decision-making process in order to give that advice to the Board for final decision.

#### **Conclusion on GSSI Essential Component A.3.06**

**Conclusion:** The ASC Salmon Standard is in alignment because holistically within the organisation there is strict compliance with the Deed Stichting ASC Foundation document which is the core of the organisation governance process which contains specific requirements for decision making of the Executive Board and Board voting rules for the Supervisory Board.

The Standard Setting Process is one of consultation and consensus ASC Standard Setting Procedure\_v.1.0, Page 4 section 6, on Page 12 section 8.10.9 explains the acceptance process for a new standard and steps that the Supervisory Board may take before approval through increased consultation.

In addition within the TAG TOR there is reference to voting processes at meetings of the Groups

(Page 8 sections 4.7.to 4.10) .

Also there are examples where there are individual TOR for specific standards where there is reference to decision making procedures and agreement is difficult to reach. (TOR Feed\_v.1.1\_website page 12).

The Supervisory Board (SB) is the ultimate decision-making body of the ASC and approves the final version of any standards newly developed or revised, based on recommendations of the Technical and Stakeholder advisory groups. There is clear evidence of consensus decision making for the Supervisory Board which is defined within the ASC Standard Setting Procedure (ref ASC Standard Setting Procedure v1.0 Nov 2014, section 6.6, page 4 and section 8.11.1, page 12).

#### **References:**

- 1) Deed Stichting ASC Foundation
- 2) ASC Standard Setting Procedure\_v.1.0
- 3) ASC TAG TOR and Rules
- 4) TOR Feed\_v.1.1\_website
- 5) ASC Standard Setting Procedure v1.0 Nov 2014, section 6.6, page 4 and section 8.11.1, page 12
- 6) Deed Stichting ASC Foundation 2011, Article 14, Page 8, Points 4,5,6,7 and 8
- 7) TAG meeting No 11 in December 2017 (confidential)

### Supplementary Component A.3.06.1

**The Scheme Owner ensures participation in standards decision-making bodies is open to all stakeholders.**

**Anderson Cabot Center comment:** According to the ASC's Supervisory Board Regulations the Supervisory Board is involved with the overall supervision of policies it does not have a role in the standard-setting decision itself and does not approve standards, as such it should not be used as an indicator of compliance with this Supplementary Component.

**GSSI response:** ASC is in alignment with Supplementary Component A.3.06.01. Based on the comment of ACC, additional clarification and evidence has been included in the final conclusion.

“The Supervisory Board (SB) is the ultimate decision-making body of the ASC. It takes the decision to develop a new standard or to revise a current one. The SB also approves the final version of any standards newly developed or revised, based on recommendations of the Technical and Stakeholder advisory groups.” (Section 6.1 in the standard setting procedure: [https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Standard-Setting-Procedure\\_v.1.0\\_including-forms.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Standard-Setting-Procedure_v.1.0_including-forms.pdf)).

#### Conclusion on GSSI Supplementary Component A.3.06.1

**Conclusion:** The ASC Salmon Standard is in alignment because there is a process by which nominations are identified by ASC for Supervisory Board membership. The protocol clearly lays down requirements in relation to competence and there is a selection process before appointment. There is also a wide range of skills defined. There is a statement regarding the need for broad representation of views and experience, gender balance, geographic diversity and a balance between the private and public sectors.

The protocol relates to the Supervisory Board only however the flowchart also highlights Technical Advisory Groups.

“The Supervisory Board (SB) is the ultimate decision-making body of the ASC. It takes the decision to develop a new standard or to revise a current one. The SB also approves the final version of any standards newly developed or revised, based on recommendations of the Technical and Stakeholder advisory groups.”

Examples were reviewed during the office audit and found to be acceptable.

#### References:

- 1) Final\_ASC SB Nominations Protocol (Confidential IE has copies provided)
- 2) Final\_ASC SB Nominations Protocol flowchart (Confidential IE has copies provided)
- 3) ASC Supervisory Board Regulations 2011, Article 1, Page 1 Role of the Supervisory Board
- 4) ASC Standard Setting Procedure [https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Standard-Setting-Procedure\\_v.1.0\\_including-forms.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Standard-Setting-Procedure_v.1.0_including-forms.pdf)
- 5) ASC Supervisory Board Regulations 2011, Article 4

### Supplementary Component A.3.06.2

**The Scheme Owner's decision-making process for standards development or revision ensures that no category of stakeholders has a majority vote in decision-making.**

**Anderson Cabot Center comment:** According to the ASC's Supervisory Board Regulations the Supervisory Board is involved with the overall supervision of policies it does not have a role in the standard-setting decision itself and does not approve standards, as such it should not be used as an indicator of compliance with this Supplementary Component.

**GSSI response:** ASC is in alignment with Supplementary Component A.3.06.02. Based on the comment of ACC, additional clarification and evidence has been included in the final conclusion.

"6.1. The Supervisory Board (SB) is the ultimate decision-making body of the ASC. It takes the decision to develop a new standard or to revise a current one. The SB also approves the final version of any standards newly developed or revised, based on recommendations of the Technical and Stakeholder advisory groups." (Section 6.1 in the standard setting procedure: [https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Standard-Setting-Procedure\\_v.1.0\\_including-forms.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Standard-Setting-Procedure_v.1.0_including-forms.pdf)).

#### Conclusion on GSSI Essential Component A.3.06.2

**Conclusion:** The ASC Salmon Standard is in alignment because the Supervisory Board has a diverse membership e.g. Supervisory Board 2 Industrial Reps and 5 Non-Industry Reps, TAG 1 Industry Rep, 3 Non-Industry Reps and 3 others. TWG on Group Certification Requirements 1 Industry Rep, 4 Non-Industry Rep and 1 other and Steering Committee for Feed Standard Development 10 Industry Reps and 5 Non-Industry Reps.

The selection of these decision-making groups is defined within the SB Nominations Protocol to provide some assurance of diversity and a broad profile.

"The Supervisory Board (SB) is the ultimate decision-making body of the ASC. It takes the decision to develop a new standard or to revise a current one. The SB also approves the final version of any standards newly developed or revised, based on recommendations of the Technical and Stakeholder advisory groups."

#### References:

- 1) <http://www.asc-aqua.org/about-us/governance/>
- 2) Final\_ASC SB Nominations Protocol (Confidential IE has copies provided)
- 3) Deed Stichting ASC Foundation 2011, Article 14, Page 8, Points 4,5,6,7 and 8
- 4) ASC Supervisory Board Regulations 2011, Article 4
- 5) <https://www.asc-aqua.org/news/latest-news/asc-appoints-four-new-members-to-supervisory-board/>

## Section C - Aquaculture

### Essential Component C.3.01

**The standard requires that the aquaculture facility and its daily operations ensure that good culture and hygienic conditions are maintained.**

**Anderson Cabot Center comment:** The standard and the audit manual makes generic statements to hygiene and culture environment but there are no details as outlined in the GSSI guidance, such as clear feed and chemical storage requirements or references to MSDS sheets, which are clearly defined and auditable criteria that are important for assuring the safety of the products being farmed and protecting the local environment. There is no reason (such as the criteria not being suitable for the scope of the standard) for GSSI to compromise on the expected content and as such the standard should not be found consistent with this Essential Component.

**GSSI response:** ASC is in alignment with Essential Component A.3.01. Based on the comment of the Anderson Cabot Center, no additional evidence has been included in the final conclusion.

The GSSI Manual (p. 13) states that “The guidance given in the application form helps to explain the intention of the GSSI Component and provides examples of evidence.” This means the GSSI Guidance provides recommendations and suggestions but does not mandate or require specific approaches or activities.

In the case of maintaining good culture and hygienic conditions, the ASC elected to take a best management approach to defining the indicator, rather than providing a specific metric to indicate “good culture and hygienic conditions.”

ASC Indicator 2.2.6 states that “Appropriate controls are in place that maintains good culture and hygienic conditions on the farm which extends to all chemicals, including veterinary drugs, thereby ensuring that adverse impacts on environmental quality are minimized.” This indicator is part of a larger section (Criterion 2.2) of six indicators on “water quality in and near the site of operation,” with emphasis on dissolved oxygen concentration. The rationale section of this part of the standard includes a fairly extensive discussion of dissolved oxygen in site selection, indicating that this must be taken into consideration in “maintaining good culture and hygienic conditions.”

Indicator 2.6.6 specifically calls for controls on chemicals, although specific storage requirements or reference to MSDS sheets are not mandated.

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

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

- 1) appropriate controls are in place that maintains good culture and hygienic conditions on the farm which extends to all chemicals, including veterinary drugs, thereby ensuring that adverse impacts on environmental quality are minimised,
- 2) presence and evidence of a functioning policy for proper and responsible treatment of non-biological waste from production (e.g., disposal and recycling),
- 3) evidence that non-biological waste (including net pens) from grow-out site is either disposed of properly or recycled,

- 4) for any farm that cleans nets at on-land sites, evidence that net-cleaning sites have effluent treatment,
- 5) 100% of dead fish removed and disposed of in a responsible manner,
- 6) percentage of workers trained in health and safety practices, procedures and policies on a yearly basis, and
- 7) presence of a health and safety risk assessment and evidence of preventive actions taken.

**References:**

- 1) ASC Salmon Standard v1.1 - April 2017
- 2) ASC Salmon Audit Manual v1.1 - April 2017  
Indicators 2.2.6, 4.5.1, 4.5.2, 4.7.2, 5.1.3, 6.5.1, and 6.5.3.
- 3) [https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Salmon-Standard\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Salmon-Standard_v1.1.pdf)

**Essential Component C.4.06**

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

**Anderson Cabot Center comment:** This is met by ASC standard 4.3.4

**GSSI response:** ASC is in alignment with Essential Component C.4.06. Based on the comment of the Anderson Cabot Center, no additional evidence has been included in the final conclusion.

We are in agreement. ASC Indicator 4.3.4 was cited as evidence for alignment with GSSI Essential Component C.4.06.

**Conclusion on GSSI Essential Component C.4.06**

**Conclusion:** The ASC Salmon Standard is in alignment because the standard includes an indicator that requires that feed does not contain fishmeal and/or fish oil originating from by-products or trimmings from IUU catch or from fish species that are categorized as vulnerable, endangered or critically endangered, according to the IUCN Red List of Threatened Species, whole fish and fish meal from the same species and family as the species being farmed.

**References:**

- 1) ASC Salmon Standard v1.1 - April 2017
- 2) ASC Salmon Audit Manual v1.1 - April 2017  
Indicator 4.3.4.

3) [https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Salmon-Standard\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Salmon-Standard_v1.1.pdf)

### Essential Component C.4.09

**The standard requires that appropriate records are kept on all feed use.**

**Anderson Cabot Center comment:** Record keeping requirements are limited to the criteria outlined in 4.2.1a of the ASC salmon audit manual do not cover the expected content outlined in the GSSI guidance, which are clearly defined and auditable criteria that are important for assuring the safety of the products being farmed. There is no reason (such as the criteria not being suitable for the scope of the standard) for GSSI to compromise on the expected content, as such the standard should not be found to be consistent with this Essential Component.

**GSSI response:** ASC is in alignment with Essential Component C.4.09. Based on the comment of the Anderson Cabot Center, additional clarification and evidence has been included in the final conclusion.

The GSSI Manual (p. 13) states that “The guidance given in the application form helps to explain the intention of the GSSI Component and provides examples of evidence.” This means the GSSI Guidance provides recommendations and suggestions but does not mandate or require specific approaches or activities.

The ASC Salmon Standard places specific and comprehensive record keeping requirements regarding feed use on certified producers. The ASC Salmon Audit Manual, under Instruction to Clients for Indicators 4.1.1 through 4.4.2, part a., requires producers to “maintain detailed records of all feed suppliers and purchases including contact information and purchase and delivery records.” Instruction to Clients for Indicator 4.2.1, part (a), requires that applicant farms “maintain a detailed inventory of the feed used including quantities used of each formulation”. This addresses the GSSI Guidance point about feed source, feed Batch/Lot/ID number, and date of purchase, which would be included in inventory records. Economic feed conversion (eFCR) is calculated according to Appendix IV-1, which is also used to calculate Feed Fish Dependency Ratio (FFDR; comparable to the Fish In: Fish Out Ratio suggested in the GSSI Guidance statement). Good record keeping is necessary to calculate eFCR and the FFDR. Documentation from feed producers, as suggested in the GSSI Guidance statement, is required by the ASC Salmon standard.

#### Conclusion on GSSI Essential Component C.4.09

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

- 1) evidence of traceability, demonstrated by the feed producer, of feed ingredients that make up more than 1% of the feed,
- 2) Fishmeal Forage Fish Dependency Ratio (FFDR<sub>m</sub>) for grow-out (calculated using formulas in Appendix IV- 1). Requirement: < 1.2, and
- 3) Fish Oil Forage Fish Dependency Ratio (FFDR<sub>o</sub>) for grow-out (calculated using formulas in Appendix IV- 1). Requirement: FFDR<sub>o</sub> < 2.52.

**In addition, the ASC Salmon Audit manual requires that producers maintain detailed records of all feed suppliers and purchases including contact information and purchase and delivery records. The**

Audit Manual also requires that producers maintain a detailed inventory of the feed used including quantities used of each formulation.

**References:**

1) ASC Salmon Standard v1.1 - April 2017

2) ASC Salmon Audit Manual v1.1 - April 2017

Indicators 4.1.1, 4.2.1, and 4.2.2.

3) [https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Salmon-Standard\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Salmon-Standard_v1.1.pdf)

4) [https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Salmon-Audit-Manual\\_v1.1-1.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Salmon-Audit-Manual_v1.1-1.pdf)

**Supplementary Component C.1.02.1**

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

**Anderson Cabot Center comment:** The standard is required to prohibit BOTH Highly and Critically important antimicrobials, the salmon standard only prohibits antimicrobials on the critically important list.

**GSSI response:** Based on the comment of the Anderson Cabot Center, the Independent Expert changed the conclusion for the Supplementary Component C.1.02.1 to “not in alignment”.

**Conclusion on GSSI Supplementary Component C.1.02.1**

**Conclusion:** [Not in alignment.](#)

**References:**



### Supplementary Component C.4.04.1

The standard requires independent verification that the feed manufacturer that sources, for whole fish ingredients greater than 1% content;

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

**Anderson Cabot Center comment:** For compliance "independent verification" of the feed manufacturer is required i.e., a 3rd party certification or audit. The salmon standard does not require an independent verification in the standard or audit manual (e.g., sourcing from an ASC certified feed mill) and is not in compliance with this component.

**GSSI response:** ASC is in alignment with Supplementary Component C.4.04.1. Based on the comment of the Anderson Cabot Center, no additional evidence has been included in the final conclusion.

According to the guidance, "[verification] is expected to include a 3rd party certification or audit of the feed manufacturer." However, the GSSI Manual (p. 13) states that "The guidance given in the application form helps to explain the intention of the GSSI Component and provides examples of evidence." This means the GSSI Guidance provides recommendations and suggestions but does not mandate or require specific approaches or activities.

The ASC Salmon standard does in fact require third-party verification of traceability of feed ingredients that make up more than 1% of the feed. Footnote 62 for ASC Indicator 4.1.1 states, in part, that "Feed manufacturers will need to supply the farm with third-party documentation of the ingredients covered under this standard." ASC Indicator 4.3.3 requires "demonstration of third-party verified chain of custody and traceability for the batches of fishmeal and fish oil." Footnote 72 for ASC Indicator 4.3.5 requires, in part, a responsible sourcing policy from sources "certified [to] a standard benchmarked at minimum consistent with relevant FAO's eco-labelling guidelines or by identified independent risk assessment."

#### Conclusion on GSSI Supplementary Component C.4.04.1

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

- 1) evidence of traceability, demonstrated by the feed producer, of feed ingredients that make up more than 1% of the feed,
- 2) prior to achieving 4.3.1, the FishSource score for the fishery(ies) from which all marine raw material in feed is derived. Requirement: All individual scores  $\geq 6$ , and biomass score  $\geq 6$ ,
- 3) prior to achieving 4.3.1, demonstration of third- party verified chain of custody and traceability for the batches of fishmeal and fish oil which are in compliance with 4.3.2,
- 4) feed containing fishmeal and/or fish oil originating from: none by-products or trimmings from IUU catch or from fish species that are categorized as vulnerable, endangered or critically

endangered, according to the IUCN Red List of Threatened Species, whole fish and fish meal from the same species and family as the species being farmed,

5) presence and evidence of a responsible sourcing policy for the feed manufacturer for marine ingredients that includes a commitment to continuous improvement of source fisheries, and

6) the policy should be written and include an assessment of source fishery status and identification of improvement needs and work plan to deliver improvements. The policy must include a commitment and timeline to source aquaculture and fishery products from responsible/best practice sources, such as those certified a standard benchmarked at minimum consistent with relevant FAO's eco-labelling guidelines or by identified independent risk assessment.

**References:**

1) ASC Salmon Standard v1.1 - April 2017

2) ASC Salmon Audit Manual v1.1 - April 2017

Indicators 4.1.1, 4.3.2, 4.3.3, 4.3.4, 4.3.5, and footnote 72.

3) [https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Salmon-Standard\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Salmon-Standard_v1.1.pdf)

#### **Supplementary Component C.4.04.5**

**The standard requires that the aquaculture facility sources feed from a manufacturer that assures the fish meal and fish oil used in the production of from aquaculture trimmings (if greater than 1% inclusion) can also be traceable back to the origin fishery and does not come from illegal, unreported, and unregulated fishing (I.U.U.) and does not contain species on the IUCN red list. The standard is expected to apply to other relevant marine feed ingredients, such as from squid and krill.**

**Anderson Cabot Center comment:** ASC standard 4.3.4 does not include criteria that specifically addresses aquaculture trimmings (i.e., from an ASC certified farm) or require 3rd party auditing of the feed mill and is not in compliance with this Supplemental Component.

**GSSI response:** ASC is in alignment with Supplementary Component C.4.04.5. Based on the comment of the Anderson Cabot Center, no additional evidence has been included in the final conclusion.

By definition, “aquaculture trimmings” are not derived from a fishery but are derived from aquaculture production. Therefore, this phrase in the text of the GSSI Supplementary Component was interpreted as trimmings used as an ingredient in aquafeed production that is derived from fisheries products. The ASC Indicator 4.3.4 prohibits the use of trimmings from IUU fisheries or from species that are categorized as vulnerable, endangered or critically endangered. It also prohibits the use of trimmings (from fisheries or aquaculture sources) derived from the same species as being cultured.

Third-party certification is provided as one suggested verification option in the GSSI Guidance statement for this Supplementary Component, but it is not required. There is no mention of third-party certification in the text of the GSSI Supplementary Component.

The wording of the ASC indicator is:

*Feed containing fishmeal and/or fish oil originating from: by-products or trimmings from IUU catch or from fish species that are categorized as vulnerable, endangered or critically endangered, according to the IUCN Red List of Threatened Species, whole fish and fish meal from the same species and family as the species being farmed.*

The wording of the GSSI Supplementary Component is:

*The standard requires that the aquaculture facility sources feed from a manufacturer that assures the fish meal and fish oil used in the production of aquaculture trimmings (if greater than 1% inclusion) can also be traceable back to the origin fishery and does not come from illegal, unreported, and unregulated fishing (I.U.U.) and does not contain species on the IUCN red list. The standard is expected to apply to other relevant marine feed ingredients, such as from squid and krill.*

#### **Conclusion on GSSI Supplementary Component C.4.04.5**

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

- 1) evidence of traceability, demonstrated by the feed producer, of feed ingredients that make up more than 1% of the feed,
- 2) feed cannot contain fishmeal and/or fish oil originating from by-products or trimmings from IUU catch or from fish species that are categorized as vulnerable, endangered or critically endangered, according to the IUCN Red List of Threatened Species, whole fish and fish meal from the same species and family as the species being farmed, and
- 3) traceability shall be at a level of detail that permits the feed producer to demonstrate compliance with the standards in this document (i.e., marine raw ingredients must be traced back to the fishery, soy to the region grown, etc.). Feed manufacturers will need to supply the farm with third-party documentation of the ingredients covered under this standard.

**References:**

- 1) ASC Salmon Standard v1.1 - April 2017
  - 2) ASC Salmon Audit Manual v1.1 - April 2017
- Indicators 4.1.1 and 4.3.4, Footnote 62.
- 3) [https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Salmon-Standard\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Salmon-Standard_v1.1.pdf)

#### **Supplementary Component C.6.05.4**

**The standard requires a legally binding, appropriately defined, and operational area management system is in place that ensures that all participant aquaculture facilities use appropriate common and, where applicable, coordinated practices for sourcing seed in order to maintain biosecurity within the AMS.**

**Anderson Cabot Center comment:** The requirements of the AMS in Appendix II of the ASC salmon standard do not set limits on seed biosecurity except for year class separation, as such the AMS is not required to be consistent

with Essential Component C.6.05 in the Aquaculture tool and cannot be considered in compliance with this Supplemental component.

**GSSI response:** ASC is in alignment with Supplementary Component C.6.05.4. Based on the comment of the Anderson Cabot Center, additional clarification has been included in the final conclusion.

According to the guidance, “[common] practices for sourcing seed are expected to include (where applicable) GSSI-Essential Components C.6.03, C.6.04, C.6.05.” However, GSSI Manual (p. 13) states that “The guidance given in the application form helps to explain the intention of the GSSI Component and provides examples of evidence.” This means the GSSI Guidance provides recommendations and suggestions but does not mandate or require specific approaches or activities.

#### **Conclusion on GSSI Supplementary Component C.6.05.4**

**Conclusion:** The ASC Salmon Standard is in alignment because the standard includes an indicator that requires participation in an Area-Based Management (ABM) scheme for managing disease and resistance to treatments that includes coordination of stocking, fallowing, therapeutic treatments and information sharing. Detailed requirements are in Appendix II-1: Area-Based Management (ABM) Scheme. [With specific reference to coordinated practices for sourcing seed, Appendix II-1 states that records must demonstrate that all stocked fish within the ABM are of the same year class and that stocking dates were coordinated with other farms.](#)

#### **References:**

- 1) ASC Salmon Standard v1.1 - April 2017
- 2) ASC Salmon Audit Manual v1.1 - April 2017  
Indicator 3.1.1, Appendix II-1.
- 3) [https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Salmon-Standard\\_v1.1.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Salmon-Standard_v1.1.pdf)

Many thanks again for participating in the Public Consultation and we do hope that the above responses have been helpful. We look forward to a continued collaboration and dialogue going forward.



Florian Zuber

GSSI Benchmark Manager