

Haarlem, 12<sup>th</sup> of December 2019

**Matthew Thompson**

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

Dear Matthew Thompson,

Many thanks for taking the time to provide your comments on the GSSI Benchmark Report for the Marine Eco-Label Japan (MEL) Program.

GSSI is committed to a transparent benchmark process with opportunity for engagement and comments. Following the consultation, the comments received from Anderson Cabot Center for Ocean Life and other stakeholders have been carefully reviewed by the Independent Experts, Benchmark Committee and the GSSI Board. Comprehensive responses to each of the comments are provided in this and other letters. After careful deliberations, the Benchmark Committee concluded the comments had been sufficiently addressed and recommends GSSI recognition of the MEL program.

In response to the comments referring to version 1.0 of the MEL Japan Fisheries Management Standard, GSSI explicitly points out that the GSSI benchmarking process and recognition only applies to version 2.0 of the MEL Japan Fisheries Management Standard (2018) and version 1.0 of the MEL Aquaculture Standard (2018). Furthermore, during the transition phase up until January 31 2021, MEL-Japan will be required to clearly differentiate between the different versions of its standard through the logo.

In response to comments concerning the present limited availability of evidence proving implementation of the MEL Japan Fisheries Management Standard v.2.0 (2018), the GSSI requirement of having at least 1 accredited certification in place before being able to achieve recognition is met.

That being said, GSSI requires a stringent monitoring of continued alignment. Under normal circumstances, the Monitoring of Continued Alignment (MOCA) review process is to take place after 1.5 years of recognition. However, in response to the comments received, the GSSI Steering Board has decided that for the case of MEL, this MOCA will be advanced to 1-year post recognition and will comprise of a public consultation to provide stakeholders the opportunity to comment on the new evidence of implementation provided and the continued alignment of the MEL scheme with the GSSI benchmark Tool.

GSSI's detailed responses to your comments by component number raised in relation to the GSSI Benchmark of MEL aquaculture standard are set out below.

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

1. Description of the component: Essential or Supplementary and the corresponded numeration
2. Text of the Component
3. Submitted Comment
4. Answer from GSSI
5. Conclusion [old part in black] [new part in blue]
6. References [old part in black] [new part in blue]

The answers to the comments and conclusions of the components make use of the GSSI benchmark language, including the following acronyms:

IE: Independent Expert

EC: Essential Component

SC: Supplementary Component

BC: Benchmark Committee

MOCA: Monitoring of Continued Alignment

## ■ **Section C - Aquaculture**

### **ESSENTIAL COMPONENT C.4.05**

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

#### ■ **New England Aquarium comment**

Re: C.4.05 Feed Biosecurity. The MEL standard 4.2.3 claims to prohibit the use of whole fish as a direct feed source; however, the Indicator for Auditors 4.2.3A states that *“Use of moist pellet, the pellet type feed made of the mixture of the chopped/crushed frozen fish and manufactured feed (binder), is allowed.”* Freezing is not a suitable approach for ensuring feed biosecurity, particularly where no controls are included to ensure that require raw feed ingredients are sourced from local fisheries. For example, Ward et al. (2001) showed that two sardine mass mortality events in Southern Australia occurred in proximity to bluefin tuna farms using frozen baitfish as feed and stated that *“these coincidences suggest that the introduction of untreated imported frozen fish products into the marine environment.”*

#### ■ **GSSI response**

MEL-J is in alignment with Essential Component C.4.05. Based on the comment of New England Aquarium, no additional information has been included in the final conclusion.

NEAQ makes a valid point about the limitations of restrictions on the use of whole fish as a feed biosecurity strategy. Some clarification about the historical role of whole fish in marine finfish mariculture in Japan is instructive. In the early years, farmers would use whole fresh fish, preferably small oily marine pelagics, as a direct feed. Feed conversion ratios and waste footprint signatures were very high. Eventually growers transitioned to the use of moist pellets, consisting of chopped frozen whole fish augured from the hold of a feeder boat into a mixer on deck. There, vitamin premixes, binder and occasionally some starch are added to the mash, which is then extruded through a low-pressure pellet die and blown onto the surface of the fish cage. The third generation of feed type is conventionally manufactured high-protein, pelleted feed with formulations adjusted for different fish life stages. Operations certified under the MEL AMS must use pelleted feed. Direct use of whole fish is prohibited. The standard includes an exception for use of moist-pellets for limited periods when water temperature is low and palatability of diets, and thus animal welfare, is a concern. The language of the MEL Aquaculture Management Standard 4.2.3 is very clear and closely mirrors that of GSSI Essential Component C.4.05.

## Conclusion on GSSI Essential Component C.4.05

**Conclusion:** The MEL Aquaculture Management Standard is in alignment because it includes a standard that prohibits the use of whole fish as a direct feed source.

### REFERENCES

1. Aquaculture Management Standard, Ver.1, 2018  
<https://melj.jp/eng/wp-content/uploads/2019/04/Aquaculture-Management-StandardAMSver.1.0.pdf>
2. Aquaculture Management Standard: Guidelines for Auditors - Indicators of Conformity - Version 1.1. 2019  
<https://melj.jp/eng/wp-content/uploads/2019/04/Aquaculture-Management-Standard-Guidelines-for-Auditors-Indicators-of-Conformity-Version.-1.1.pdf>
3. Checklist for Auditors 2018  
<http://melj.jp/eng/wp-content/uploads/2018/09/C3.%E3%80%90Checklist%E3%80%91-Aquaculture.pdf>  
Standard 4.2.3
4. [First Annual Surveillance Report: Azuma-cho Fishery Cooperative Association JFRCA Assessment plan dated 1 September 2019](#)

## ESSENTIAL COMPONENT C.6.03

*The standard requires that where the deliberate use of wild seed is justifiable, it is collected in a manner that:*

- *Ensures controls are in place so that the collection of seed is not detrimental to the status of the wild target and non-target populations, nor the wider ecosystem.*
- *Avoids the use of environmentally damaging collection practices*
- *Source fishery is regulated by an appropriate authority.*

### ■ New England Aquarium comment

Statements within MEL that where *“the use of wild seeds is justifiable when seed are collected legally without negative impact on natural resources and the environment”* is insufficient to demonstrate consistency with the Component, particularly as the Guidance to evaluators outlines significant additional details to determine consistency. For example, the Indicators 4.3.2 do not consider the health of the wild fishery (i.e., whether it is overfished, or overfishing is occurring) or the added pressure placed on the fishery by removing juveniles for fattening before they are able to reproduce.

### ■ GSSI response

MEL-J is in alignment with Essential Component C.6.03. Based on the comment of New England Aquarium, no additional information has been included in the final conclusion.

The NEAQ points that the statement that includes the phrase “without negative impact on natural resources and the environment” is insufficient evidence of alignment with GSSI Essential Component C.6.03. Such a statement is considered consistent with GSSI language “to avoid detrimental effects on wild populations and the supporting ecosystem.” MEL guidance states that *“Standard 4.3.2 accepts the use of wild seeds on the condition that the wild seeds are caught by a certified catcher in compliance with relevant regulations and in consideration of minimizing the impact on natural resources.”*

Alignment with this GSSI Essential Component requires the standard to have three elements:

1. Controls to avoid detrimental effects on wild populations and the supporting ecosystem. Indicator B of Standard 4.3.2 states that “Where wild seeds are used, proper resource assessment is conducted on the species of seeds.” This implies that the status of the stock with respect to overfishing is established.
2. Avoidance of environmentally damaging collection practices. Indicator D of Standard 4.3.2 states that “The seeds are caught properly and legally by a certified fisher in accordance with the relevant laws and regulations.” This implies the potentially environmentally damaging collection practices would not allow operations that use wild seed collected by damaging collection practices to achieve certification. Indicator E states that “The impact of bycatch on natural resources is considered.” MEL guidance further states that “When measures to minimize the influence on natural resources are taken into consideration, it is assumed that the bycatch species are properly released (either by the seed catcher or at the aquaculture farm) and that measures (fishing gear and methods) to avoid bycatch are used, if available.”
3. Source fishery is regulated by an appropriate authority. Standard 4.2.3 states that wild seed collection must be done legally. Indicator D states that “seeds are caught properly and legally by a certified fisher in accordance with the relevant laws and regulations.” MEL guidance adds that “Auditors should observe that the seed collector is certified by MEL or that the collector complies with the relevant regulations of the local government.”

### Conclusion on GSSI Essential Component C.6.03

**Conclusion:** The MEL Aquaculture Management Standard is in alignment because it includes a criterion that requires that seed be used properly to minimize any impact on natural resources.

It also includes specific standards that require that:

1. hatchery-raised seed are used preferentially, and
2. the use of wild seeds is justifiable when seed are collected legally without negative impact on natural resources and the environment.

### REFERENCES

1. Aquaculture Management Standard, Ver.1, 2018  
<https://melj.jp/eng/wp-content/uploads/2019/04/Aquaculture-Management-StandardAMSver.1.0.pdf>
2. Aquaculture Management Standard: Guidelines for Auditors - Indicators of Conformity - Version 1.1. 2019  
<https://melj.jp/eng/wp-content/uploads/2019/04/Aquaculture-Management-Standard-Guidelines-for-Auditors-Indicators-of-Conformity-Version.-1.1.pdf>
3. Checklist for Auditors 2018  
<http://melj.jp/eng/wp-content/uploads/2018/09/C3.%E3%80%90Checklist%E3%80%91-Aquaculture.pdf>  
Criterion 4.3, Standards 4.3.1 and 4.3.2
4. [First Annual Surveillance Report: Azuma-cho Fishery Cooperative Association JFRCA Assessment plan dated 1 September 2019](#)

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.

Kindest regards,

A handwritten signature in black ink, appearing to read 'H. Wisse', with a stylized, cursive script.

**Herman Wisse**  
GSSI Managing Director