

Haarlem, 17th of February 2020

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Subject: Response to Public Consultation ASC Scope Extension

Dear Elmé Coetzer-Boersma,

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

GSSI is committed to a transparent benchmark process with opportunity for engagement and comments. Following the consultation, the comments received from GLOBALG.A.P. and the other stakeholders have been carefully reviewed by the Independent Experts, Benchmark Committee and the GSSI Steering 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 ASC program, including the Shrimp Standard (formerly solely the Salmon Standard).

GSSI's responses to your comments by component number raised 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 corresponding numeration.
2. Text of the Component.
3. Submitted Comment.
4. Response by GSSI Independent Expert.
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.4.01

*The standard requires the aquaculture facility sources feed from a manufacturer that can trace fish meal and fish oil (>1% inclusion) to the species and, at least, to the country of origin.*

#### ■ GLOBALG.A.P. comment

The benchmarking report has repeatedly mentioned that ASC shrimp standard implementing a criterion 7.2.1a to request 100% raw materials from fisheries products (fishmeal and fish oil) used in feed to come from fisheries certified by a full ISEAL member (according to the ASC shrimp standard this is applicable after 5 years of the standard publication, i.e. the effect from March 2019). However, question is how this can be complied because actually there is few fisheries which is already certified by the full ISEAL member. If this criterion is not applicable at the moment under ASC shrimp standard, the ASC shrimp standard is in alignment with this requirement or not.

#### ■ GSSI response

The ASC Shrimp standard is in alignment with Essential Component C.4.01. Based on the comment of GLOBALG.A.P., no additional changes were made to the final conclusion.

GSSI Essential Component C.4.01 requires traceability of fishmeal and fish oil. This traceability is required of all feed ingredients with >2% incorporation by Indicator 7.1.1. This indicator alone is sufficient evidence of alignment with this GSSI Essential Component. With specific reference to marine ingredients (including fishmeal and fish oil), the ASC Shrimp standard does indeed require all fishmeal and fish oil to be derived from forage fisheries certified by an ISEAL member (Indicator 7.2.1a). However, the standard provides some flexibility and presents two alternative pathways: use of a FishSource score or engagement in a Fisheries Improvement Program. The requirement for use of fishmeal and fish oil derived from fisheries certified by a full ISEAL member exceeds the requirements of GSSI Essential Component C.4.01.

#### **Conclusion on GSSI Essential Component C.4.01**

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

- 1) A document from the feed supplier (on company letterhead) must be provided to the auditor that lists the ingredients above 2%, states personal accountability for the veracity of the claim by the top QA/management staff, and gives permission for the relevant content of auditor reports to be disclosed to purchasing retailers. Initially, the farmer is required to provide all the information that he or she has available to help clarify where improvement is required. (7.1.1)
- 2) Requires the demonstration of chain of custody and traceability for fisheries products in feed through an ISEAL-accredited or International Organization for Standardization (ISO)120 65-compliant certification scheme that also incorporates the FAO Code of Conduct for Responsible Fisheries. (7.1.2)
- 3) ISEAL is a global association for social and environmental standards systems. More information can be found at <http://www.isealalliance.org> . ASC Shrimp Standard strives to meet the ISEAL guidelines for standard setting. Fisheries ingredients must be certified by a process that conforms to the ISEAL guidelines within five years of the publication date of the ASC Shrimp Standard. The farm's feed manufacturer may use the "mass balance approach" to demonstrate that it purchased the appropriate amount and kind of "certified" ingredients to supply feed to all of its customers making a similar request. These ingredients would get mixed into the general silos and production lines of the manufacturer, greatly reducing costs associated with special storage capacity and production lines. This could be done instead of requiring documentation for a single batch per farm. Fishmeal and fish oil used in

shrimp feed (including those made from fisheries by-products) must not contain products from a) target fisheries that are on CITES Appendix I, on the IUCN's Red List in categories: Near Threatened, Vulnerable, Endangered and Critically Endangered, b) a target fishery that has bycatch with significant impact on species listed on CITES Appendix I, on the IUCN's Red Listed species (categories as above), upon landing, on an annual basis or c) bycatch with significant impact on CITES/IUCN listed species. (Guidance for implementation 7.2.1a)

4) In the interim period prior to 7.2.1a being achievable, a farm may opt to use a feed containing 80% by volume fishmeal and fish oil bearing a score of 8 on FishSource scoring category 4, and 6 or higher in all other categories. Additional requirements include no "N/A" in Score 2 (whether managers follow scientific advice) and Score 4 (stock assessment) along with "N/A" in no more than one other score.

ASC recognizes the challenges that this may create for Southeast Asian farmers whose fisheries may not have a FishSource score. The Sustainable Fisheries Partnership is working on populating FishSource with regional fisheries in Asia as soon as possible to accommodate this demand.

ASC recognizes that to some this standard may be insufficient, as it does not fully address the impact of removing forage fish in large quantities from the base of the marine food chain. This standard will need to evolve as new knowledge emerges. (Rational 7.2, three last paragraphs page 89 and first line page 90)

## REFERENCES

1. AASC Shrimp Standard v1.0 - March 2014  
[https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Shrimp-Standard\\_v1.0\\_FINAL\\_Layout\\_changes.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Shrimp-Standard_v1.0_FINAL_Layout_changes.pdf)  
Indicators 7.1.1, 7.1.2, 7.21a, b and c
2. ASC Shrimp Audit Manual v1.0 - March 2014  
[https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Shrimp-Audit-Manual\\_v1.0.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Shrimp-Audit-Manual_v1.0.pdf)  
Indicators 7.1.1, 7.1.2, 7.21a, b and c

## ESSENTIAL COMPONENT C.4.02

*The standard requires the aquaculture facility sources feed from a manufacture that prohibits fishmeal and fish oil from endangered species.*

### ■ GLOBALG.A.P. comment

The benchmarking report has repeatedly mentioned that ASC shrimp standard implementing a criterion 7.2.1a to request 100% raw materials from fisheries products (fishmeal and fish oil) used in feed to come from fisheries certified by a full ISEAL member (according to the ASC shrimp standard this is applicable after 5 years of the standard publication, i.e. the effect from March 2019). However, question is how this can be complied because actually there is few fisheries which is already certified by the full ISEAL member. If this criterion is not applicable at the moment under ASC shrimp standard, the ASC shrimp standard is in alignment with this requirement or not.

### ■ GSSI response

The ASC Shrimp standard is in alignment with Essential Component C.4.02. Based on the comment of GLOBALG.A.P., no additional changes were made to the final conclusion.

The Guidance for Implementation for Indicator 7.2.1a states that "Fishmeal and fish oil used in shrimp feed (including those made from fisheries by-products) must not contain products from a) target fisheries that

are on CITES Appendix I, on the IUCN's Red List in categories: Near Threatened, Vulnerable, Endangered and Critically Endangered, b) a target fishery that has bycatch with significant impact on species listed on CITES Appendix I, on the IUCN's Red Listed species (categories as above), upon landing, on an annual basis or c) bycatch with significant impact on CITES/IUCN listed species.”

### **Conclusion on GSSI Essential Component C.4.02**

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

1) Fishmeal and fish oil used in shrimp feed (including those made from fisheries by-products) must not contain products from a) target fisheries that are on CITES Appendix I, on the IUCN's Red List in categories: Near Threatened, Vulnerable, Endangered and Critically Endangered, b) a target fishery that has bycatch with significant impact on species listed on CITES Appendix I, on the IUCN's Red Listed species (categories as above), upon landing, on an annual basis or c) bycatch with significant impact on CITES/IUCN listed species. (7.2.1a)

2) Fishery status information may be accessed through FishSource = a. 8, and b. 6 or compliance with alternative interim proposal 7.2.1c. ([www.fishsource.org/indices\\_overview.pdf](http://www.fishsource.org/indices_overview.pdf)) and the IFFO Responsible Fisheries (7.2.1.b)

3) Lacking a FishSource assessment a fishery could be engaged in an Improvers Program. (transparent and public Fisheries Improvement Project (FIP) with periodic public reporting (refer to Appendix VII). (7.2.1.c)

### **REFERENCES**

3. AASC Shrimp Standard v1.0 - March 2014  
[https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Shrimp-Standard\\_v1.0\\_FINAL\\_Layout\\_changes.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Shrimp-Standard_v1.0_FINAL_Layout_changes.pdf)  
Indicators 7.1.1, 7.1.2, 7.21a, b and c
4. ASC Shrimp Audit Manual v1.0 - March 2014  
[https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Shrimp-Audit-Manual\\_v1.0.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Shrimp-Audit-Manual_v1.0.pdf)  
Indicators 7.1.1, 7.1.2, 7.21a, b and c

### **ESSENTIAL COMPONENT C.4.04**

*The standard requires that the aquaculture facility sources feed from a manufacturer that has a written policy which includes 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 ecolabelling guidelines or by identified independent risk assessment.*

#### **■ GLOBALG.A.P. comment**

The benchmarking report has repeatedly mentioned that ASC shrimp standard implementing a criterion 7.2.1a to request 100% raw materials from fisheries products (fishmeal and fish oil) used in feed to come from fisheries certified by a full ISEAL member (according to the ASC shrimp standard this is applicable after 5 years of the

standard publication, i.e. the effect from March 2019). However, question is how this can be complied because actually there is few fisheries which is already certified by the full ISEAL member. If this criterion is not applicable at the moment under ASC shrimp standard, the ASC shrimp standard is in alignment with this requirement or not.

## ■ GSSI response

The ASC Shrimp standard is in alignment with Essential Component C.4.04. Based on the comment of GLOBALG.A.P, no additional changes were made to the final conclusion. The ASC Shrimp standard explicitly indicated a commitment and a five-year timeline to source aquaculture and fishery products from responsible/best practice sources.

### **Conclusion on GSSI Essential Component C.4.04**

**Conclusion:** The ASC Shrimp Standard is in alignment because the standard includes an indicator that requires the aquaculture facility sources feed from a manufacturer that has a written policy which includes 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 ecolabelling guidelines or by identified independent risk assessment.

1) 7.1.1: A document from the feed supplier (on company letterhead) must be provided to the auditor that lists the ingredients above 2%, states personal accountability for the veracity of the claim by the top QA/management staff, and gives permission for the relevant content of auditor reports to be disclosed to purchasing retailers. Initially, the farmer is required to provide all the information that he or she has available to help clarify where improvement is required.

2) 7.1.2: Requires the demonstration of chain of custody and traceability for fisheries products in feed through an ISEAL-accredited or International Organization for Standardization (ISO)120 65-compliant certification scheme that also incorporates the FAO Code of Conduct for Responsible Fisheries.

3) 7.2.1a: ISEAL is a global association for social and environmental standards systems. More information can be found at <http://www.isealalliance.org> . ASC Shrimp Standard strives to meet the ISEAL guidelines for standard setting. Fisheries ingredients must be certified by a process that conforms to the ISEAL guidelines within five years of the publication date of the ASC Shrimp Standard. The farm's feed manufacturer may use the "mass balance approach" to demonstrate that it purchased the appropriate amount and kind of "certified" ingredients to supply feed to all of its customers making a similar request. These ingredients would get mixed into the general silos and production lines of the manufacturer, greatly reducing costs associated with special storage capacity and production lines. This could be done instead of requiring documentation for a single batch per farm. Fishmeal and fish oil used in shrimp feed (including those made from fisheries by-products) must not contain products from a) target fisheries that are on CITES Appendix I, on the IUCN's Red List in categories: Near Threatened, Vulnerable, Endangered and Critically Endangered, b) a target fishery that has bycatch with significant impact on species listed on CITES Appendix I, on the IUCN's Red Listed species (categories as above), upon landing, on an annual basis or c) bycatch with significant impact on CITES/IUCN listed species.

4) 7.2.1b: Fishery status information may be accessed through FishSource ([www.fishsource.org/indices\\_overview.pdf](http://www.fishsource.org/indices_overview.pdf)) and the IFFO Responsible Fisheries (<http://www.iffo.net/iffo-rs>)

### **REFERENCES**

5. AASC Shrimp Standard v1.0 - March 2014

[https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Shrimp-Standard\\_v1.0\\_FINAL\\_Layout\\_changes.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Shrimp-Standard_v1.0_FINAL_Layout_changes.pdf)  
Indicators 7.1.1, 7.1.2, 7.21a, b and c

6. ASC Shrimp Audit Manual v1.0 - March 2014

[https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Shrimp-Audit-Manual\\_v1.0.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Shrimp-Audit-Manual_v1.0.pdf)  
Indicators 7.1.1, 7.1.2, 7.21a, b and c

## ESSENTIAL COMPONENT C.4.08

*The standard requires that feed, feed additives, feed ingredients, and fertilizers used are compliant with relevant national and local laws.*

### ▪ GLOBALG.A.P. comment

ASC Responsible Feed Standard is only a draft version at the moment and not yet implementing and thus it should not be mentioned here.

### ▪ GSSI response

The ASC Shrimp standard is in alignment with Essential Component C.4.08. Based on the comment of GLOBALG.A.P., no additional changes were made to the final conclusion.

Although it is true that the ASC Feed Standard is currently under revision, there is an existing operational feed standard (v 0.2) that applies to existing ASC-certified feed mills and provides suitable evidence of alignment with this GSSI Essential Component. According to the timeline on the ASC website (<https://www.asc-aqua.org/what-we-do/our-standards/new-standards-and-reviews/new-farm-standards/new-feed/>), launch of the revised feed standard is anticipated to occur in Q4 2019.

## Conclusion on GSSI Essential Component C.4.08

**Conclusion:** The ASC Shrimp Standard is in alignment because the standard requires compliance with all applicable national laws and regulations (Principle 1).

1) Compliance with local and national laws or regulations = Proofs of permits or other relevant documentation available for applicable (1.1.1)

2) Transparency on legal compliance = Government-issued operational permits and licenses are publicly available one month after request (1.1.2).

In addition, the ASC Responsible Feed Standard requires full compliance with all relevant local, regional and national laws regarding operation of the feed mill including possession of necessary legal permits. (ASC feed standard 1.1.2)

## REFERENCES

1. ASC Shrimp Standard v1.0 - March 2014  
[https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Shrimp-Standard\\_v1.0\\_FINAL\\_Layout\\_changes.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Shrimp-Standard_v1.0_FINAL_Layout_changes.pdf)  
Indicators 1.1.1 and 1.1.2

2. ASC Shrimp Audit Manual v1.0 - March 2014

[https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Shrimp-Audit-Manual\\_v1.0.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/07/ASC-Shrimp-Audit-Manual_v1.0.pdf)  
Indicators 1.1.1 and 1.1.2

3. ASC Responsible Feed Standard v0.2,

[https://www.asc-aqua.org/wp-content/uploads/2017/06/ASC-Responsible-Feed-Standard\\_v0.2.pdf](https://www.asc-aqua.org/wp-content/uploads/2017/06/ASC-Responsible-Feed-Standard_v0.2.pdf)  
Indicator 1.1.2

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,



Herman Wisse  
GSSI Managing Director