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Subject: Response to MEL MOCA Public Comments

Dear Bertrand,

Many thanks for taking the time to provide your comments on the GSSI Benchmark Report for the Marine Ecolabel Japan (MEL) Monitoring of Continued Alignment (MOCA) Process.

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 MOCA of the MEL Fisheries Management System and Aquaculture Management System is 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.1.05

The standard requires the aquaculture facility to establish, implement and maintain appropriate procedures to respond to disease outbreaks, which includes the ability to quarantine the aquatic animal where feasible.

ASC comment

Not 'in Alignment' with C.1.05. Appropriate procedures to "establish, implement and maintain appropriate procedures to respond to disease outbreaks, which includes the ability to quarantine the aquatic animal where feasible" are lacking.

MEL outlines requirements (Criteria 2.1 & 2.2) for disease monitoring and treatment, but has no requirements for parasite monitoring or control, nor does it address the potential impacts of parasites transferring to wild species or acting as disease vectors.

For example, MEL (2.1.3) states that "Aquaculture farmers shall monitor the environmental conditions of the farming site by using proper indicators" without defining (thus ensuring) "proper indicators" nor which "environmental conditions" they are meant to measure (nor to what 'level'). MEL refers to "health condition" without defining/specifying it (2.2.1) etc.

GSSI response

MEL is in alignment with GSSI Essential Component C.1.05. Based on the Public Consultation comment of the ASC, no additional changes were made to the Conclusion/References.

GSSI Essential Component C.1.05 has a specific focus on responses to disease outbreaks. Disease detection and monitoring (directly related to the concern raised by ASC) is specifically addressed in GSSI Essential Component C.1.06. Disease and parasite transmission is specifically addressed in GSSI Essential Component C.1.10. MEL is in alignment with all of these GSSI Essential Components. Although there is no specific standard in the MEL Aquaculture Management Standard v.1.0 that relate to the specific concern about monitoring parasites, standard 2.2.1 specifies the requirement for a health (disease) monitoring system and is interpreted broadly to include parasites. MEL standard 2.2.1 uses the phrase “appropriate indicators” that can be interpreted to mean that specific disease concerns (e.g., parasites) that are related to a specific combination of species and culture system should be monitored, despite their lack of specification in the standard. In addition to the requirement for a health monitoring program, the MEL Aquaculture Management Standard v.1.1 also includes standards related to collection of mortalities (2.2.2) and the potential for disease transmission caused by escapes (2.2.3) and using “clean seed” as stocking material (2.2.4). Finally, MEL 2.1.3, cited by ASC as the basis of concern for a lack of alignment with GSSI Essential Component C.1.05, was not used as evidence of alignment during the benchmarking process.

Conclusion on GSSI Essential Component C.1.05

CONCLUSION

The MEL-J Aquaculture Management Standard v.1.0 is in alignment with GSSI essential component because it includes a criterion that requires that aquatic animals be maintained under appropriate management to prevent disease outbreak and spread. It also includes specific standards that require:
1) regular health monitoring,
2) mortality collection and treatment,
3) escape prevention,
4) certification of health status of seed, and
5) disease prevention and vaccination.

In addition, there have been no changes in the MEL-J its Aquaculture Management Standard Ver.1.0, 2018, or its Aquaculture Management Standard: Guidelines for Auditors - Indicators of Conformity - Ver1.1, 2019.

Finally, the following MEL-J assessment and audit reports provide evidence or examples of alignment with GSSI component of C.1.05:

・Second Annual Surveillance Report. Azuma-Cho Fishery Cooperative Association, Yellowtail Aquaculture, 4-1, 4-2, 4-3 and 4-4. Certification No.: JFRCA 10A7700011.

・Initial Assessment Report. Shigeyoshi Suisan, Red Sea Bream Aquaculture. Certification No.: JFRCA 10A4900021.

・Initial Assessment Report. Yonkyu, Bluefin Tuna (Hatchery-Raised Seed) Aquaculture/ Certification No.: JFRCA 10A6700041.

・Initial Assessment Report. Hattori Suisan Ltd., Greater Amberjack Cage Culture. Certification No.: JFRCA 10A6600021.

Standards 2.2.1, 2.2.2, 2.2.3, 2.2.4 and 2.2.5.

REFERENCES

1. Aquaculture Management Standard, Ver.1.0, 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: Marine Eco-Label Japan Aquaculture Management Standards 2019. https://melj.jp/eng/wp-content/uploads/2019/04/Checklist-for-Auditors-of-the-Aquaculture-Management-Standard.pdf. Criterion 2.2, Standards 2.2.1, 2.2.2, 2.2.3, 2.2.4 and 2.2.5.

4. Second Annual Surveillance Report: Azuma-Cho Fishery Cooperative Association, Yellowtail Aquaculture. Certification No.: JFRCA 10A7700011. Not available online. azuma-cho_yellowtail_aqua_mel_2020_2nd_annual_audit_report_combined_r2_20201125 (confidential)

5. Initial Assessment Report: Shigeyoshi Suisan, Red Sea Beams Aquaculture. Certification No.: JFRCA 10A4900021. Available online: http://www.fish-jfrca.jp/04/pdf/mel/farmed_fisheries_JFRCA10A4900021.pdf (Japanese only)

Essential Component C.1.10

The standard requires the aquaculture facility to establish, implement and maintain appropriate procedures and/or systems to reduce the likelihood of disease and parasite transmission within and between the aquaculture facility and natural aquatic fauna.

- **ASC comment**

Not 'in Alignment' with c.1.10. which requires “Appropriate procedures and/or systems to reduce the likelihood of disease and parasite transmission” are lacking

MEL outlines some requirements (e.g. Criteria 2.1 & 2.2) for disease monitoring and treatment, but has no requirements for parasite monitoring or control, nor does it address the potential impacts of parasites transferring to wild species or acting as disease vectors.

Overall, the MEL Standard is vague on many requirements, using ambiguous language such as “enough”, “suitable”, “appropriate” without accurately defining what these terms means. This has for repercussion that many performances, best practices cannot be verified nor is there guidance for auditors as to 'what' those verifiable performances are/should be.

- **GSSI response**

MEL is in alignment with GSSI Essential Component C.1.10. Based on the Public Consultation comment of the ASC, no additional changes were made to the Conclusion/References.

See GSSI response to previous comment on C.1.05 regarding requirements for parasite monitoring or control and disease transfer to wild species. Although no specific requirements for parasite monitoring or control are included in the MEL Aquaculture Management Standard, the requirement for a health (disease) monitoring system indicated in standard 2.2.1 is interpreted broadly to include parasites.

Regarding the use of ambiguous or vague language, the point is taken. During benchmarking, MEL-J has been encouraged to be more specific about the requirements of its standards, where possible. However, the scope of the standard, as defined, is quite broad with respect to species and culture systems, including marine finfish in cages, freshwater fish grown in inland culture systems, and molluscan shellfish grown in nearshore waters. Thus, use of ambiguous language is appropriate given the broad scope because definitions of “suitable,” “appropriate,” or “proper” are to a large extent defined by species, culture system and production environment. Finally, the MEL Guidelines for Auditors provides some greater specificity not explicitly defined in the Aquaculture Management Standard itself.

Conclusion on GSSI Essential Component C.1.10

CONCLUSION

The MEL Aquaculture Management Standard is in alignment because it includes a criterion that requires that aquatic animals be maintained under appropriate management to prevent disease outbreak and spread. It includes specific standards that require escape prevention and a prohibition on the intentional release of diseased aquatic animals.

The Standard also includes a criterion that requires aquaculture shall be operated properly to minimize any impacts on the aquaculture sites and surrounding environment. It includes a specific standard that aquaculture be operated in compliance with relevant laws and regulations on habitat and biodiversity, including a requirement for proper measures to prevent the escape of aquaculture animals.

Furthermore, MEL-J is in alignment with this GSSI essential component because there have been no changes in the MEL-J its Aquaculture Management Standard Ver.1.0, 2018, or its Aquaculture Management Standard: Guidelines for Auditors - Indicators of Conformity - Ver1.1, 2019.

Additionally, the following MEL-J assessment and audit reports provide evidence or examples of alignment with GSSI component C.1.10:

・Second Annual Surveillance Report. Azuma-Cho Fishery Cooperative Association, Yellowtail Aquaculture, 4-1, 4-2, 4-3 and 4-4. Certification No.: JFRCA 10A7700011.

・Initial Assessment Report. Shigeyoshi Suisan, Red Sea Bream Aquaculture. Certification No.: JFRCA 10A4900021.

・Initial Assessment Report. Yonkyu, Bluefin Tuna (Hatchery-Raised Seed) Aquaculture/ Certification No.: JFRCA 10A6700041.

・Initial Assessment Report. Hattori Suisan Ltd., Greater Amberjack Cage Culture. Certification No.: JFRCA 10A6600021.
Standards 2.2.2 and 2.2.3, Standard 4.4.1 - Indicator D

REFERENCES

1. Aquaculture Management Standard, Ver.1.0, 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: Marine Eco-Label Japan Aquaculture Management Standards 2019. https://melj.jp/eng/wp-content/uploads/2019/04/Checklist-for-Auditors-of-the-Aquaculture-Management-Standard.pdf. Criterion 2.2, Standards 2.2.1, 2.2.2, 2.2.3, 2.2.4 and 2.2.5.

4. Second Annual Surveillance Report: Azuma-Cho Fishery Cooperative Association, Yellowtail Aquaculture. Certification No.: JFRCA 10A7700011. Not available online. azuma-cho_yellowtail_aqua_mel_2020_2nd_annual_audit_report_combined_r2_20201125 (confidential)

5. Initial Assessment Report: Shigeyoshi Suisan, Red Sea Beams Aquaculture. Certification No.: JFRCA 10A4900021. Available online: http://www.fish-jfrca.jp/04/pdf/mel/farmed_fisheries_JFRCA10A4900021.pdf (Japanese only)

Essential Component C.5.01

For cage production systems, the standard requires appropriate management measures for preventing excessive impacts of aquaculture facility waste on benthic environments.

- **ASC comment**

Not 'in Alignment' with c.5.01. Benthic requirements are lacking.

Further to our comment re. the revision of the GSSI Benchmark v1.0 (Guidance regarding expectations on withholding certification are not part of a Standard. These are assurance matters - not Standard setting matters. As the whole guidance spins around marine impacts, and not freshwater impacts, suggest to rename Component to reflect this. FAO Paragraphs are not explicit on benthic impacts.), the issues already raised are highlighted in this MEL-MOCA report by the IE decision that MEL is Aligned with c.5.01; We'd disagree.

GSSI requirement [C.5.01] is already rather vague and open to interpretation “For cage production systems, the standard requires appropriate management measures for preventing excessive impacts of aquaculture facility waste on benthic environments”; but MEL only includes legal compliance and that “waste that may affect the benthic environment (from aquaculture in closed waters) is properly disposed of on land.” MEL 4.1.3 requires “monitoring” with no description. In our view, the MEL is not sufficient to provide assurance and certification to the effect that "appropriate management measures for preventing excessive impacts of aquaculture facility waste on benthic environments”.

Furthermore, the intent of MEL's 4.1.3c is also unclear “procedures for treating residual feed are properly established and implemented”.

- **GSSI response**

MEL is in alignment with GSSI Essential Component C.5.01. Based on the Public Consultation comment of the ASC, no additional changes were made to the Conclusion/References.

Requirements for assessing and regulating benthic impacts are actually quite specific in the MEL Aquaculture Management Standard. Indicator 2.1.1 B requires monitoring of COD and total sulfide on the bottom. In the MEL Guidelines for Auditors, the guidance for Indicator 4.1.3 A explains the use of an “index of suitable location” (ISL) that restricts the production level at farm sites on the basis of water depth and current velocity. The production level thresholds were developed empirically and are derived from a peer-reviewed journal article that evaluated benthic impacts with regard to water depth and current velocity. This approach has been validated in the field and is the basis for government regulation of benthic impacts on marine cage farm sites through restriction of allowable density. This approach is also consistent with “allowable zones of effect” that is provided as an example in the Guidance statement for GSSI Essential Component C.5.01.

Conclusion on GSSI Essential Component C.5.01

CONCLUSION

The MEL Aquaculture Management Standard is in alignment because it includes a criterion that requires that aquaculture activities be carried out in accordance with suitable operating procedures established to minimize environmental impact caused by aquaculture equipment and materials, excretions of aquatic animals, and feed residues. It also includes specific standards that require that:
1) The density of fish be controlled adequately, and organic matter shall be monitored to prevent increased sedimentation of organic matter and occurrence of de-oxygenated water, and
2) waste disposal from aquaculture operated in closed water be managed properly to prevent negative impact on the benthic environment.

Additionally, MEL-J is in alignment with this GSSI essential component because there have been no changes in the MEL-J its Aquaculture Management Standard Ver.1.0, 2018, or its Aquaculture Management Standard: Guidelines for Auditors - Indicators of Conformity - Ver1.1, 2019.

Finally, the following MEL-J assessment and audit reports provide evidence or examples of alignment with GSSI component of C.5.01:

・Second Annual Surveillance Report. Azuma-Cho Fishery Cooperative Association, Yellowtail Aquaculture, 4-1, 4-2, 4-3 and 4-4. Certification No.: JFRCA 10A7700011.

・Initial Assessment Report. Shigeyoshi Suisan, Red Sea Bream Aquaculture. Certification No.: JFRCA 10A4900021.

・Initial Assessment Report. Yonkyu, Bluefin Tuna (Hatchery-Raised Seed) Aquaculture/ Certification No.: JFRCA 10A6700041.

・Initial Assessment Report. Hattori Suisan Ltd., Greater Amberjack Cage Culture. Certification No.: JFRCA 10A6600021.
Standards 2.1.1, 2.1.2 and 2.1.3, Standards 4.1.3 and 4.1.4.
Standards 2.2.1, 2.2.2, 2.2.3, 2.2.4 and 2.2.5.

REFERENCES

1. Aquaculture Management Standard, Ver.1.0, 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: Marine Eco-Label Japan Aquaculture Management Standards 2019. https://melj.jp/eng/wp-content/uploads/2019/04/Checklist-for-Auditors-of-the-Aquaculture-Management-Standard.pdf
   Criterion 2.1, Standards 2.1.1, 2.1.2 and 2.1.3.
   Criterion 4.1, Standards 4.1.3 and 4.1.4.
   Appendix 1: Water Quality Standard for Fisheries (2012)

4. Second Annual Surveillance Report: Azuma-Cho Fishery Cooperative Association, Yellowtail Aquaculture. Certification No.: JFRCA 10A7700011. Not available online. azuma-cho_yellowtail_aqua_mel_2020_2nd_annual_audit_report_combined_r2_20201125 (confidential)

5. Initial Assessment Report: Shigeyoshi Suisan, Red Sea Beams Aquaculture. Certification No.: JFRCA 10A4900021. Available online: http://www.fish-jfrca.jp/04/pdf/mel/farmed_fisheries_JFRCA10A4900021.pdf (Japanese only)

Essential Component C.8.03

Where appropriate (e.g. land-based freshwater ponds supplied with groundwater and all culture systems where water resources are limiting) the standard requires that the aquaculture facility has appropriate management measures for efficient water use.

- **ASC comment**

Not 'in Alignment' with c.8.03. as "...appropriate management measures for efficient water use" requirements are lacking. MEL requires water use to follow regulations (4.1.2) and treat effluent (4.1.4), but does not verify that legislated allowance is “measured” or “efficient”, or that treatment of wastewater is adequate.

- **GSSI response**

MEL is in alignment with GSSI Essential Component C.8.03. Based on the Public Consultation comment of the ASC, no additional changes were made to the Conclusion/References.

Indicator 4.1.2 D of the MEL Aquaculture Management Standard states that “Inland aquaculture facilities obtain the rights of water usage from local government and use the amount of water within the permitted range.” While true that this indicator does not refer specifically to water use efficiency, using water within a “permitted range” could be interpreted to mean that there is a limited quantity of water available to a farming operation and therefore they must operate within those limits. There is a broad range of water use efficiency in inland aquaculture, depending largely on production intensity and the degree of water recirculation. Thus, defining efficient water use is difficult and the idea of “operating within the available allocated supply” can be seen as a proxy for water use efficiency.

Regarding the adequacy of wastewater treatment, Indicator 4.1.2 E states that “Inland aquaculture facilities are equipped with a proper wastewater treatment facility” and Indicator 4.1.2 F states that “If the inland aquaculture facility is not equipped with a wastewater treatment facility, the quality of the wastewater satisfies the wastewater standards.” This indicates that wastewater treatment must be adequate, as defined by national wastewater standards, to be discharged.

Conclusion on GSSI Essential Component C.8.03

CONCLUSION

The MEL Aquaculture Management Standard is in alignment because it includes a criterion that requires that aquaculture activities be carried out in accordance with suitable operating procedures established to minimize environmental impact. A standard requires that water used for aquaculture shall be utilized in compliance with relevant laws and regulations. An indicator of this standard requires that inland aquaculture facilities obtain the rights of water usage from local government and use the amount of water within the permitted range.

Furthermore, MEL-J is in alignment with GSSI essential component because there have been no changes in the MEL-J its Aquaculture Management Standard Ver.1.0, 2018, or its Aquaculture Management Standard: Guidelines for Auditors - Indicators of Conformity - Ver1.1, 2019.

Additionally, the following MEL-J assessment and audit reports provide evidence or examples of alignment with GSSI component of C.8.03:

・Second Annual Surveillance Report. Azuma-Cho Fishery Cooperative Association, Yellowtail Aquaculture, 4-1, 4-2, 4-3 and 4-4. Certification No.: JFRCA 10A7700011.

・Initial Assessment Report. Shigeyoshi Suisan, Red Sea Bream Aquaculture. Certification No.: JFRCA 10A4900021.

・Initial Assessment Report. Yonkyu, Bluefin Tuna (Hatchery-Raised Seed) Aquaculture/ Certification No.: JFRCA 10A6700041.

・Initial Assessment Report. Hattori Suisan Ltd., Greater Amberjack Cage Culture. Certification No.: JFRCA 10A6600021.
Standard 4.1.2 - Indicator D.

REFERENCES

1. Aquaculture Management Standard, Ver.1.0, 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: Marine Eco-Label Japan Aquaculture Management Standards 2019 https://melj.jp/eng/wp-content/uploads/2019/04/Checklist-for-Auditors-of-the-Aquaculture-Management-Standard.pdf
   Criterion 4.1, Standard 4.1.2 - Indicator D.

4. Second Annual Surveillance Report: Azuma-Cho Fishery Cooperative Association, Yellowtail Aquaculture. Certification No.: JFRCA 10A7700011. Not available online. azuma-cho_yellowtail_aqua_mel_2020_2nd_annual_audit_report_combined_r2_20201125 (confidential)

5. Initial Assessment Report: Shigeyoshi Suisan, Red Sea Beams Aquaculture. Certification No.: JFRCA 10A4900021. Available online: http://www.fish-jfrca.jp/04/pdf/mel/farmed_fisheries_JFRCA10A4900021.pdf (Japanese only)