Stichting
Global Sustainable
Seafood Initiative

Donkere Spaarne 26 rd
2011 JG Haarlem
The Netherlands

Haarlem, 4th of November 2021

Michiel Fransen
Head of Standards and Science
Aquaculture Stewardship Council
Daalseplein 101, 3511 SX
Utrecht, The Netherlands

Dear Michiel,

Many thanks for taking the time to provide your comments on the GSSI Benchmark Framework v2.0.

GSSI is committed to a transparent benchmark process with opportunity for engagement and comments. Following the consultation, the comments received from **Aquaculture Stewardship Council** and other stakeholders have been carefully reviewed by our Expert Working Groups. Responses to each of the comments are provided in this and other letters. After careful deliberations, the GSSI Steering Board concluded the comments had been sufficiently addressed and consequently, approved the Benchmark Framework v2.0.

Version 2.0 of the GSSI Global Benchmark Tool, which includes the Benchmark Framework v2.0, was successfully launched on October 20th during the GSSI Partners Meeting.

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:

EWG: Expert Working Group
EC: Essential Component
SC: Supplementary Component

Section A – Governance

SUPPLEMENTARY COMPONENT A.1.01.02

Component text

The Scheme Owner provides, within its means, translations into appropriate languages of its standard-setting procedures, most recent work program, and draft and final versions of its standards.

- **ASC**

Deletion is fine, however a clarification is needed: GSSI needs to define what it means “directly engaged in the operational affairs (auditing to certification) of the certification or accreditation programme” (A.1.02).
Consider to request IEs to map out and include in the public consultation report of schemes who command chain looks like and who is engaged in that chain. There are GSSI recognised schemes, who charge certification holders for certification fees, and appoint a CB to an audit, only release NC when fees are paid and issue certificate.
Are these activities considered by GSSI part of “operational affairs”?

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

All stakeholder participation related items are included in A.3.23. This will increase the efficiency of the framework and the inclusion of stakeholder participation related items in an Essential Component, which is in line with the assurance GSSI recognized schemes are expected to offer.

GSSI Supplementary Component A.1.01.02

Component text: ~~The Scheme Owner provides, within its means, translations into appropriate languages of its standard-setting procedures, most recent work program, and draft and final versions of its standards.~~

Guidance text: ~~Scheme owner has a process for determining the need for translation and publication of documents in appropriate language to ensure access and transparency based on scope of activities and geographies. The procedure includes an assessment in order to ensure accurate translation.~~

~~Examples of evidence for scheme alignment :~~

- ~~Relevant policy and procedure document control system,~~
- ~~Work plans covering language needs assessment,~~
- ~~Process for ensuring accuracy of translations.~~

Deleted, incorporated in A.3.23

REFERENCES

FAO 53 [75].

SUPPLEMENTARY COMPONENT A.1.03.01

Component text

The top governance body of the Scheme Owner carries out a regular performance review of the scheme, with results that are made publicly available.

- **ASC**

Consider making this component Essential.
Benchmarking report should include links to what is “publicly available”.
If governance is not transparent, it is doubtful that the rest of the operation of a scheme is transparent.

FAO [61] should be referred to here as well; “transparent” is the first principle under Governance. If governance is not transparent, the scheme cannot be credible.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

The Scheme Owner cannot review its governance body; therefore, it has been changed into review of the Scheme Owner by its governance body. It is equivalent to a Management Review that also includes Governance aspects.

GSSI Supplementary Component A.1.03.01

Component text: The top governance body of the Scheme Owner carries out a regular performance review of the scheme, with results that are made publicly available.

Guidance text: Scheme Owner ensures continuous improvement of its operations by undertaking an annual performance review by its governance body.
Results are made publicly available to ensure transparency and accountability.

Examples of evidence for scheme alignment on the Scheme owner website:

- performance review findings and defined actions,
- annual report which includes summary of review

REFERENCES

ISO/IEC 17067:2013.

ESSENTIAL COMPONENT A.1.04

Component text

The Scheme Owner makes information freely and available about the scheme’s ownership, governance structure, the composition, operating procedures and responsibilities of its governance bodies, standard-setting procedures and standards.

Guidance text

All applicable listed governance documents are easily accessible online, free or at cost of any printing and handling costs.

Examples of evidence for scheme alignment:

- Applicable documents posted on website, easy to find and free to download.

- **ASC**

It is not clear why “printing” is redundant?

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

The sentence “at cost of any printing and handling costs.” is redundant with “if printed copies are offered - charges are reasonable to cover printing and handling”.

GSSI Essential Component A.1.04

Component text: The Scheme Owner makes information freely and available about the scheme’s ownership, governance structure, the composition, operating procedures and responsibilities of its governance bodies, standard-setting procedures and standards.

Guidance text: All applicable listed governance documents are easily accessible online, free or at cost of any printing and handling costs.

Examples of evidence for scheme alignment:

- Applicable documents posted on website, easy to find and free to download.

REFERENCES

Principle 2.4 para. 3, and Principle [17.d]

ESSENTIAL COMPONENT A.1.07

Component text

The Scheme Owner has a defined scope for certification under its scheme.

- **ASC**

Consider deletion of “…the standard” in the first sentence of the guidance of the component and replacement with “… that its scheme”.

The 2nd paragraph of the guidance more properly suggest that the scope of certification may be covered in other documents of a scheme (certification methodology) than just standard.

- **GSSI response**

Based on ASC’s comment, the Component text has been changed.

“Scheme” has been replaced with “standard” in the Component text. A scheme may have several standards. The Guidance mentions other documents, such as contracts, that may include mention of the scope, but this is complementary to the scope definition in the standard.

GSSI Essential Component A.1.07

Component text: The Scheme Owner has a defined scope for certification under its standard.

Guidance text: The Scheme Owner clearly defines the scope that the standard covers, for example which species, production systems/gear type, geographical locations, company structures (single units, groupings of sites/boats, smallholder groups/small-scale fisheries, subcontractors, product categories, certifiable units in the chain of custody etc.).

Examples of evidence for scheme alignment:

- Explicit scope definition in standards, certification methodology/requirements, objectives.
- Contracts with accreditation bodies, certification bodies and/or certified operations

REFERENCES

101-103 [125-127] [FAO draft evaluation Framework Aquaculture],
ISO 17067 Section 6.5.1 & 6.3.7.

ESSENTIAL COMPONENT A.2.01

Component text

The Scheme Owner has a publicly available policy governing use of symbols, logos and claims. This policy includes the provision of written authorizations or licences to use the scheme's mark/claim/logo only when the facility and products have been certified to the relevant standard.

Any misleading use or statement by the company regarding the status or scope of its certification shall be prohibited.

- **ASC**

1. Consider replacing the words “the company” in the last paragraph of the component with “the certified organisation/entity” (be consistent with FAO and the rest of this tool).

2. Consider extending this component to scheme owner itself when making claims to make sure that it does not confuse users/stakeholders/consumers (Often confusion is created by claims the scheme owner makes. If a scheme runs different certification modules/scopes, claims it makes must be crystal clear as to what it certifies, or it is recognised for. E.g if the scheme has GFSI recognition for primary production, it should not be allowed to say it has GFSI recognition in general, as it misleads to understand that it has GFSI recognition for processing facilities as well).

- **GSSI response**

Based on ASC’s comment, the Component text has been changed.

The word “company” in the Component text has been changed to “certified entity” for consistency within the Tool.

GSSI Essential Component A.2.01

Component text: The Scheme Owner has a publicly available policy governing use of symbols, logos and claims.
This policy includes the provision of written authorizations or licences to use the scheme's mark/claim/logo only when the facility and products have been certified to the relevant standard.

Any misleading use or statement by the certified entity regarding the status or scope of its certification shall be prohibited.

Guidance text: Scheme Owner has a policy that covers use of symbols, logos and claims if applicable to its system. The policy is public, easily accessible and available in languages appropriate to geographic scope.

Contracts or formal agreements with the certified entity specify legal responsibility for the use of the scheme's mark/claim/logo only when the facility and/or product are certified.

Examples of evidence for scheme alignment:

- Publicly available Logo Use and Claim statement which is explicitly referenced in formal arrangement with certified entity.
- Other examples include: direct logo agreements, licensing or membership agreements with the Scheme Owner or its commercial partner or indirect contracts/agreements through the certification body.
- In the latter case the requirements to include this in contracts/ agreements should be outlined in certification requirements/ methodologies or similar contract/agreement between the Scheme Owner and the certification body.

REFERENCES

FAO Guidelines 141 [161], Principle 2.4 and [17.d]
ISO 17021 8.3.1

ESSENTIAL COMPONENT A.3.13

Component text

The Scheme Owner allows a period of at least 60 days for the submission of comments on the draft standard.

Guidance text

The Scheme Owner has a mechanism is in place to assure a minimum of 60 days for comments on the draft standard.
A Standard is considered to be a set of documents that provide rules and guidelines to achieve results and that include all normative documents used for the certification process.
This includes standard governance and setting procedures, requirements for certification bodies and certified entities

Examples of evidence for scheme alignment:

- Internal procedure/quality handbook defining public comment period.
- ToR

Review previous comments and dates for submission on draft standards.

- **ASC**

False definition of "Standard". Confusion arises with a "Standards system", or, "Certification System".

Suggest to keep focus on 'what matters' during consultation - seeking input on a revised (draft) Standard. Matters in other documents (which have not changed) should not be opened up for consultation together with draft Standard.

Please see ISEAL Standard Setting Code, page 7, https://www.isealalliance.org/sites/default/files/resource/2017-11/ISEAL_Standard_Setting_Code_v6_Dec_2014.pdf

- **GSSI response**

Based on the Public Consultation comments, the Guidance text has been changed.

The new phrasing of the Guidance text allows the Scheme Owner to define what constitutes major changes of standards that consequently need to be submitted to public consultation.

GSSI Essential Component A.3.13

Component text: The Scheme Owner allows a period of at least 60 days for the submission of comments on the draft standard.

Guidance text: The Scheme Owner has a mechanism is in place to assure a minimum of 60 days for comments on the draft standard.
A Standard is considered to be a set of documents that provide rules and guidelines to achieve results and that include all normative documents used for the certification process.
The Scheme owner shall define which documents are part of the standard.
This may include standard governance and setting procedures, requirements for certification bodies and certified entities.

Examples of evidence for scheme alignment:

- Internal procedure/quality handbook defining public comment period.
- ToR

Review previous comments and dates for submission on draft standards.

REFERENCES

FAO 57 [79].

ESSENTIAL COMPONENT A.3.23

Component text

The Scheme Owner shall make translations of the standard into English and in the most relevant/appropriate languages, to ensure access and transparency, freely available and authorizes translations into other languages where necessary for credible implementation of the standard. Documents translated shall include standard setting procedures, most recent work program, draft and final versions of the standard.

- **ASC**

Costs for translation of draft documents are high. Better to ask for translation of summaries/key changes. Governance documents (including the Standard Setting Code) are to be by default in English.

- **GSSI response**

Based on ASC's comment, the Component text has been changed.

The need for translation into other languages has been deleted, as well as the requirement of translation of documents other than the standard itself.

GSSI Essential Component A.3.23

Component text: The Scheme Owner shall make translations of the standard into English, and in the most relevant/appropriate languages, to ensure access and transparency, freely available ~~and authorizes translations into other languages where necessary for credible implementation of the standard.~~
~~Documents translated shall include standard setting procedures, most recent work program, draft and final versions of the standard.~~

Guidance text: The Scheme Owner has a mechanism in place to identify the applicability and need for translations based on geographical scope of certification, as well as the geographical range of certified entities and products.
The process includes an assessment in order to ensure accurate translation.
Examples of evidence for scheme alignment:

- Internal procedure, quality handbook, current language availability, work plan of translations, process for ensuring accuracy of translations.

REFERENCES

Adapted from FAO 53 [75]
ISEAL Standard Setting Code 5.7.3

ESSENTIAL COMPONENT A.3.25

Component text

The Scheme Owner requires that the certified entities are given a period of at most three years to come into compliance with revised fishery standards and at most one year for revised aquaculture standards.

Guidance text

Certified entities are given sufficient time to come into compliance with revised standards, for fisheries – at most 3 years and at least one year for revised aquaculture standards.
Examples of evidence for scheme alignment:

- Standards, certification requirements/methodologies which state minimum transition period for revised standards.

- **ASC**

Although generally OK, 1 year might be too short when changes are of such nature that this is not feasible for all farms in the programme. Example, introduction of Feed Standard and farms needing to switch to compliant feed. This requires mills to be certified, supply to be developed and distribution lines to be developed. Transition within 1 year is not feasible.

- **GSSI response**

Based on ASC's comment, the Component and Guidance text has been changed.

The decision was made to keep the requirement as it was in original version, as no consensus was reached on change. The proposal is to stay close to FAO guidelines.

GSSI Essential Component A.3.25

Component text: The Scheme Owner requires that the certified entities are given a period of at least three years to come into compliance with revised fishery standards and at least one year for revised aquaculture standards.

Guidance text: Certified entities are given sufficient time to come into compliance with revised standards, for fisheries – at most 3 years and at least one year for revised aquaculture standards.
Examples of evidence for scheme alignment:

- Standards, certification requirements/methodologies which state minimum transition period for revised standards.

REFERENCES

FAO 60 [82].

Section B – Operational Management

ESSENTIAL COMPONENT B.1.01

Component text

The Scheme Owner has a contractual, enforceable arrangement or formal understanding that requires accreditation bodies to be compliant with the requirements of ISO/IEC 17011 in its applicable version.

Guidance text

The Scheme Owner has a contract, memorandum of understanding or enforceable arrangement with a certification body or accreditation body that require the accreditation bodies to be compliant to ISO/ IEC 17011.

Examples of evidence for scheme alignment:

- Contracts,
- Memorandums of understanding and/or memorandum of agreements between scheme and accreditation bodies or certification bodies that specify accreditation bodies to be compliant with ISO/IEC 17011.
- Accreditation bodies' certificate of accreditation (on website).
- Rules for accreditation bodies in standard.

- **ASC**

Consider adding: "… in scheme documents such as standard or certification methodology that are publicly available".

This is needed to be consistent with component A.01.07.

Possible that not all schemes specify this in their standard as a document of the scheme.
It has to be explicit to be aligned with the component.

- **GSSI response**

Based on ASC's comments, the Guidance text has been changed.

Additional text has been added to the Guidance for consistency.

GSSI Essential Component B.1.01

Component text: The Scheme Owner has a contractual, enforceable arrangement or formal understanding that requires accreditation bodies to be compliant with the requirements of ISO/IEC 17011 in its applicable version.

Guidance text: The Scheme Owner has a contract, memorandum of understanding or enforceable arrangement with a certification body or accreditation body that require the accreditation bodies to be compliant to ISO/ IEC 17011.

Examples of evidence for scheme alignment:

- Contracts,
- Memorandums of understanding and/or memorandum of agreements between scheme and accreditation bodies or certification bodies that specify accreditation bodies to be compliant with ISO/IEC 17011.
- Accreditation bodies' certificate of accreditation (on website).
- Rules for accreditation bodies in scheme documents such as standard or certification methodology that are publicly available.

REFERENCES

The FAO Ecolabelling Guidelines paragraph 64, 66, [86, 87, 88],
ISO/IEC 17011:2004 [86].
The FAO Ecolabelling Guidelines paragraphs 67, 69-77, 79-84, 87-95, 97-99 [86, 89, 91-99, 101-106, 109-119, 121-123]

ESSENTIAL COMPONENT B.1.03

Component text

The Scheme Owner specifies the requirements for certification bodies that the accreditation body is required to verify.

- **ASC**

The component must be explicit about the scope of accreditation, whether or not it has to cover the scope of the scheme being evaluated/recognised by GSSI.

There are schemes that only require accreditation against ISO 17065 for any scope of services of certification bodies, but not the scope of the scheme itself.

GSSI evaluation of those schemes overlooked it, making those schemes in alignment with this component of GSSI, hugely damaging credibility of GSSI.

- **GSSI response**

Based on ASC's comments, the Component text has been changed.

Additional text has been added to the Component to include mention about the coherence between the scope of accreditation and the scope of the scheme.

GSSI Essential Component B.1.03

Component text: The Scheme Owner specifies the requirements for certification bodies that the accreditation body is required to verify, including the respect of the scope of the scheme.

Guidance text: The Scheme Owner defines requirements for certification bodies to ensure accurate and consistent implementation. These are verified as part of the accreditation process by the accreditation body.

Examples of evidence for scheme alignment:

- Requirements are specified in certification requirements/ methodologies or a separate certification body and/or accreditation manual.
- Reference to requirements in contracts or formal agreements with certification bodies or accreditation bodies.

REFERENCES

FAO Guidelines paragraph [65], paragraph 64 [87].

ESSENTIAL COMPONENT B.1.09

Component text

The Scheme Owner ensures that the accreditation process includes a review of the performance of certification bodies and auditors, using witness audits.

Guidance text

The Scheme Owner specifies that accreditation includes a performance review of certification bodies and auditors.
Examples of evidence for scheme alignment:

- Accreditation/certification requirements/methodologies, accreditation body audit reports, audit schedule, specified in accreditation body or certification body contracts/agreements.
- Agreement/contract between the Scheme Owner and certification body to use national accreditation bodies which are IAF members and signatories to the Multilateral Recognition Arrangement for ISO 17065.

- **ASC**

ASC doesn't agree with this addition.
Witness audit is just one way to evaluate performance of CBs and auditors. However, it has been wildly recognised that witness audit is not as effective, though can still be a tool.

- **GSSI response**

Based on ASC's comment, the Guidance text has been changed.

Additional examples of performance reviews have been added to the Guidance text.

GSSI Essential Component B.1.09

Component text: The Scheme Owner ensures that the accreditation process includes a review of the performance of certification bodies and auditors, using witness audits.

Guidance text: The Scheme Owner specifies that accreditation includes a performance review of certification bodies and auditors; that may include desktop reviews, office visits, witness audits.

Examples of evidence for scheme alignment:

- Accreditation/certification requirements/methodologies, accreditation body audit reports, audit schedule, specified in accreditation body or certification body contracts/agreements.
- Agreement/contract between the Scheme Owner and certification body to use national accreditation bodies which are IAF members and signatories to the Multilateral Recognition Arrangement for ISO 17065.

REFERENCES

Not specifically defined in the FAO Guidelines, however this is considered a requirement for good practice in accreditation of seafood certification schemes, in the GSSI Public Consultation and Expert Consultation Workshops. It is considered a necessary level of rigour of the accreditation audit to better assess the operations of the CBs.

ESSENTIAL COMPONENT B.2.03

Component text

The validity of a certification cycle required by the Scheme Owner shall not exceed 5 years in the case of fishery or 3 years in the case of aquaculture certification and 3 years in the case of chain of custody certification.

- **ASC**

The change is not necessary: the language in the changed component is inconsistent with that of the rest of the benchmarking tool.

The word "shall" is different than the rest of the document.

The intent of the current component is clear.

- **GSSI response**

Based on ASC's comments, the Component text has been changed to make clear that validity of the certification cycle is directly defined by the Scheme Owner.

GSSI Essential Component B.2.03

Component text: The Scheme Owner defines that the validity of a certification cycle does not exceed 5 years in the case of fishery or 3 years in the case of aquaculture certification and 3 years in the case of chain of custody certification.

Guidance text: The Scheme Owner defines this requirement in the contract, memorandum of understanding or enforceable agreement with the accreditation body and/or certification body.

Examples of evidence for scheme alignment:

- Accreditation manual/certification requirements/methodologies. Issued certificates with validity (online database or on request)

REFERENCES

FAO Guidelines paragraphs 131-132 [151-152].

ESSENTIAL COMPONENT B.2.04

Component text

The Scheme Owner requires that certification bodies carry out periodic surveillance and monitoring at sufficiently close intervals to verify that certified operations continue to comply with the certification requirements. For aquaculture operations, this should be on an annual basis.

- **ASC**

Consider to change the last sentence in this component.

Either institutionalise the “annual” for aquaculture in the component or move the last sentence to Guidance part.
For consistency reasons, it is recommended to make this “annual basis” is must in this component.

The use of the word “should” is not good in an essential component. (“For aquaculture operations, this should be on an annual basis.”)

- **GSSI response**

Based on ASC’s comments, the Component text has been changed.

The word “should” has been changed to “shall” for consistency.

GSSI Essential Component B.2.04

Component text: The Scheme Owner requires that certification bodies carry out periodic surveillance and monitoring at sufficiently close intervals to verify that certified operations continue to comply with the certification requirements. For aquaculture operations, this shall be on an annual basis.

Guidance text: The Scheme Owner defines this requirement in the contract, memorandum of understanding or enforceable agreement with accreditation body and/or certification body. Scheme owner risk assessment system should identify “sufficient close intervals”.

Examples of evidence for scheme alignment:

- Accreditation manual/certification requirements/methodologies.
- Scheme Owner internal risk assessment system with assessment reports.
- Audit reports, schedules and issued certificates.

REFERENCES

FA

O Guidelines paragraph 128 [148].

SUPPLEMENTARY COMPONENT B.2.05.02

Component text
The Scheme Owner has defined requirements for sampling methodology and frequency that certification bodies are required to follow during the audit.

- **ASC**

This component should be Essential. Sampling is a way to ensure consistency (B.2.05) in assessment methodology.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

The objective of this revision is not to change Supplementary into Essential Components.

GSSI Supplementary Component B.2.05.02

Component text: The Scheme Owner has defined requirements for sampling methodology and frequency that certification bodies are required to follow during the audit.

Guidance text: The Scheme Owner defines the requirements for certification bodies for sampling methodology and frequency of audits.

Examples of evidence for scheme alignment:

- Contract, memorandum of understanding or enforceable agreement between the Scheme Owner and the certification body.
- Accreditation manual, certification requirements/ methodologies
- Audit reports
- Guidance specifying sampling methodology (including what issues to focus on) and sampling frequency, in order to support consistency between certification bodies.

REFERENCES

GFSI Guidance Document Version 6.3 – Part II, 3.5.1 and 3.5.2
ISEAL Assurance Code 6.4.4,
FAO Certification and Ecolabelling Guidelines Principle 2.8 [17.h and 17.i]

ESSENTIAL COMPONENT B.2.07

Component text

The Scheme Owner requires that certification bodies follow procedures and guidance for multi-site certifications as written in the standards, if allowed under the scheme.

- **ASC**

Consider replacing new added text "… written in standards" with "… specified in scheme documents".

It is specification, not a simple 'writing'.

Scheme requirements may be specified in other documents than standards only (e.g. certification methodology).

- **GSSI response**

Based on ASC's comments, the Component text has been changed.

The text "or other scheme documents" has been added to cover other documents used in following procedures. Procedures, Guidance for multi-site certification, should be written in the standard under benchmark, or in other scheme documents.

GSSI Essential Component B.2.07

Component text: The Scheme Owner requires that certification bodies follow procedures and guidance for multi-site certifications as written in the standards or other scheme documents, if allowed under the scheme.

Guidance text: If the Scheme Owner explicitly does not allow multi-site certification (prohibits, not that it is not yet developed or exists) requirement is "Not applicable". Otherwise, the Scheme Owner requires certification body to have documented certification procedures and guidance for multi-site certification.

Examples of evidence for scheme alignment:

- Memorandum of understanding or enforceable agreement between the Scheme Owner and the certification body;
- Certification requirements/methodologies specifying multi-site procedures;
- Guidance specifying certification procedures for multi-site certifications, in order to support consistency between certification bodies;
- Audit reports.

REFERENCES

This requirement supports consistency in assessment of multi-site operations, which are not considered explicitly under FAO however is considered important to provide guidance for this in order to be able to ensure an impartial and accurate certification system as required in paragraph 107 [128].

ESSENTIAL COMPONENT B.2.09

Component text

The Scheme Owner requires that certification bodies have in place consistent procedures for stakeholders to provide input during the certification process.

- **ASC**

It must be made clear 'who' are those to be considered as stakeholders to be involved in the certification process.

GSSI should provide examples to demonstrate what it means by “stakeholders” for this component.

Rational: GSSI benchmarking reports of some schemes suggest that GSSI accepts personnel of sites being audited as stakeholders, which is very different from use of the term “stakeholder” by FAO. Those personnel/staff are otherwise to be defined as 'internal stakeholders', to differentiate them from the generally accepted definition of 'stakeholders' and/or 'external stakeholders' from a corporate viewpoint.

And this is an essential component; inconsistent implementation of it poses risk to credibility of GSSI.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

The definition of stakeholder is given in the glossary and includes both internal and external stakeholders.

GSSI Essential Component B.2.09

Component text: The Scheme Owner requires that certification bodies have in place consistent procedures for stakeholders to provide input during the certification process.

Guidance text: The Scheme Owner defines this requirement for certification bodies to have a documented procedure to enable input from all stakeholders during the certification process.

Examples of evidence for scheme alignment:

- Contract/agreement between the Scheme Owner and the certification body, certification requirements/methodologies specifying requirements for mechanism for stakeholder input during certification process.
- Guidance specifying procedures.
- Review certification body process for input:
- Publicly available information for stakeholder input, public announcements, audit work plans, requests for input.

- Audit reports with stakeholder input.

REFERENCES

FAO Principle 2.4 and 3 [17.e].

SUPPLEMENTARY COMPONENT B.2.09.02

Component text

For fisheries, the Scheme Owner requires certification bodies to make publicly available for comment a draft of the full audit report prior to the certification decision (excluding commercially sensitive information), with sufficient time for interested parties to submit comments. The Scheme Owner requires certification bodies to respond to all comments received.

- **ASC**

Make this component supplement for aquaculture as well. Why would this not applicable in aquaculture when stakeholder inputs are essential for GSSI? There is no credible rationale provided by GSSI (unless transparency and stakeholder input are deemed 'not relevant') for not seeking to make a draft of the full audit report publicly available prior to the certification decision and making this Supplementary Component applicable to Aquaculture.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

It has not been agreed to align fisheries and aquaculture on this Component. The transparency on audit reports is handled for aquaculture, after certification has been granted, in B2.14.01 and B2.14.01.

GSSI Supplementary Component B.2.09.02

Component text: For fisheries, the Scheme Owner requires certification bodies to make publicly available for comment a draft of the full audit report prior to the certification decision (excluding commercially sensitive information), with sufficient time for interested parties to submit comments. The Scheme Owner requires certification bodies to respond to all comments received.

Guidance text: Applicable only to fisheries. For Aquaculture "Not Applicable". The Scheme Owner defines this requirement for certification bodies to solicit input before a certification decision is made and to respond to all comments. Format and "sufficient" time should be defined that takes into consideration the risk, scope, size and type of stakeholders.

Examples of evidence for scheme alignment:

- Contract/agreement between the Scheme Owner and the certification body, certification requirements/methodologies specifying requirement
- Guidance specifying procedures for determining channel and time
- Review certification body process for input: publicly available information for stakeholder input, public announcements, audit work plans, requests for input,
- Audit reports with documented stakeholder input,

- System for tracking comments and responses.

REFERENCES

FAO Ecolabelling Guidelines Principle 2.4 and 3.

ESSENTIAL COMPONENT B.2.10

Component text

The Scheme Owner requires that certification bodies follow requirements for determining non-compliances, verifying corrective actions arising from non-compliances and allowing for appeals of non-compliances.

Guidance text

For accurate and consistent implementation of the standard, the Scheme Owner ensures that certification bodies follow non-compliances, verifying corrective actions arising from non-compliances, and allowing for appeals of non-compliances.

Examples of evidence for scheme alignment:

- Contract, memorandum of understanding or enforceable agreement between the Scheme Owner and the certification body.
- Accreditation manual, certification requirements/methodologies.
- Guidance documents, determining non-compliances, verifying corrective actions arising from non-compliances and allowing for appeals of non-compliances, in order to support consistency between certification bodies.
- Audit reports.
- Standards.

- **ASC**

1. Consider adding the following text in the component: "… follow its requirements …" (to be consistent with the intention of the component as explained in the "rationale" for change).

2. The first paragraph in the guidance is not completed (Is it GSSI's intention to state that the CBs must follow requirements of scheme owners on non-conformities, etc?
"For accurate and consistent implementation of the standard, the Scheme Owner ensures that certification bodies follow non-compliances, verifying corrective actions arising from non-compliances, and allowing for appeals of non-compliances.")

- **GSSI response**

Based on ASC's comments, the Component text has been changed.

The word "its" has been added to be consistent with the intention of the Component.

GSSI Essential Component B.2.10

Component text: The Scheme Owner requires that certification bodies follow its requirements for determining non-compliances, verifying corrective actions arising from non-compliances and allowing for appeals of non-compliances.

Guidance text: For accurate and consistent implementation of the standard, the Scheme Owner ensures that certification bodies follow non-compliances, verifying corrective actions arising from non-compliances, and allowing for appeals of non-compliances.

Examples of evidence for scheme alignment:

- Contract, memorandum of understanding or enforceable agreement between the Scheme Owner and the certification body.
- Accreditation manual, certification requirements/methodologies.
- Guidance documents, determining non-compliances, verifying corrective actions arising from non-compliances and allowing for appeals of non-compliances, in order to support consistency between certification bodies.
- Audit reports.
- Standards.

REFERENCES

Not specifically defined in the FAO Guidelines, however considered key component for impartial and accurate certification as required in paragraph 107 [128]. This is a requirement under ISO-17065:2012 8.7 and 8.8.

ESSENTIAL COMPONENT B.2.11

Component text

The Scheme Owner requires that the scope of the (re-)certification audit includes a visit to locations pertinent to the scope of the certification.

- **ASC**

Consider remote audit instead of on-site assessment for certain conditions (under risk assessment by scheme owners).

IAF had recognised the need and possibility for remote audits since years.
Accreditation Auditing Practice Group (AAPG) and IAF have issued guidance and mandatory requirements for remote audits.
The covid-19 situation proves that remote audit is possible and perhaps becomes new normal.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

It is not intended to include remote auditing in the review of the Global Benchmark Tool. The GSSI Extraordinary Measures Policy covers the possibility of remote audits under certain conditions.

GSSI Essential Component B.2.11

Component text: The Scheme Owner requires that the scope of the (re-)certification audit includes a visit to locations pertinent to the scope of the certification.

Guidance text: The Scheme Owner requires that the scope of the audit (initial, annual or re-assessment) includes on-site assessment of premises covered by the scope of the standards and which one or more key activities are performed.

Examples of evidence for scheme alignment:

- Contract, memorandum of understanding or enforceable agreement between the Scheme Owner and the certification body,
- Accreditation manual, certification requirements/methodologies,
- Guidance documents specifying procedures for determining site visits including sampling,
- Review audit reports.

REFERENCES

Not specifically defined in the FAO Guidelines, however this is considered a requirement for good practice in seafood certification, in the GSSI Public Consultation and Expert Consultation Workshops. It is considered a necessary level of rigour of the certification audit which enables CBs to ground-truth the practices of the enterprise undergoing assessment.

ESSENTIAL COMPONENT B.2.14

Component text

For aquaculture, the Scheme Owner requires certification bodies to make summary audit reports publicly available (excluding commercially sensitive information) after certification has been granted.

- **ASC**

GSSI should clarify and define explicitly:

(i) The difference between “publicly available” and “upon request” [See the quote, in Rationale], and

(ii) A minimum content of the summary audit report.

Rational: GSSI benchmarking reports of schemes show different interpretations and thus different/inconsistent implementation of those 2 important topics.

One report mentions:
“Certification Body, as required by GSSI, shall make summary audit reports for farms available to XXXX (name of the scheme) once certification has been granted, to be made publicly available on XXXX’s (scheme name) website, upon request.

Another report writes:
“…The website has the summary of certification status and any related suspensions/sanctions. … allow scheme owner access to all certified entity’s data in the database and full access by market participants and third parties ….”

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

Publicly available and upon request are not mutually exclusive.

GSSI Essential Component B.2.14

Component text: For aquaculture, the Scheme Owner requires certification bodies to make summary audit reports publicly available (excluding commercially sensitive information) after certification has been granted.

Guidance text: Applicable only to Aquaculture. For Fisheries “Not Applicable”. The Scheme Owner defines this requirement for certification bodies to make summary audit reports, after certification has been granted, publicly available. Commercially sensitive information is excluded. Contracts with certified entities should clearly give notice of this requirement.

Examples of evidence for scheme alignment:

- Contract/agreement between the Scheme Owner and the certification body, contract with certification body and certified entity with this requirement.
- Certification requirements/methodologies specifying requirement.
- Guidance specifying that making reports available to stakeholders happens in a timely manner.
- Certification body website for posted reports.

REFERENCES

FAO Guidelines Paragraph 122, 124 [142, 144], FAO Principle 2.4, 2.12 and 3 [17.e].

Section C – Aquaculture

ESSENTIAL COMPONENT C.1.01

Component text

(Combined with C.1.02): The standard requires that the decision to treat with antimicrobial agents, and their subsequent application, is consistent with the Principles for Responsible & Prudent Use of Antimicrobial Agents in Aquatic Animals and other guidance of the OIE Aquatic Animal Health Code i.e., by the aquatic animal health professional or other relevant competent authority and in response to a diagnosed disease; see Articles 6.2.7 and 6.2.8 of the 2015 Aquatic Animal Health Code).

Guidance text

The standard is expected to prohibit prophylactic usage for growth promotion and require that all antimicrobials are used in response to a diagnosed disease (i.e., by the aquatic animal health professional or other relevant competent authority) and the audit is expected to include a review of suitable evidence (e.g., records of disease testing etc. prescriptions for treatments). The audit is expected to include a review of evidence (such as written records or through interviews) to ensure consistency with OIE guidelines (2015) Article 6.2.7 “The veterinarian or other aquatic animal health

professional authorized to prescribe veterinary medicines should indicate precisely to the aquatic animal producer the treatment regime, including the dose, the treatment intervals, the duration of the treatment, the withdrawal period and the amount of antimicrobial agents to be delivered, depending on the dosage and the number of aquatic animals to be treated. The use of antimicrobial agents extra-label/off-label may be permitted in appropriate circumstances in conformity with the relevant legislation" and Article 6.2.8 "Aquatic animal producers should use antimicrobial agents only on the prescription of a veterinarian or other aquatic animal health professional authorized to prescribe veterinary medicines, and follow directions on the dosage, method of application, and withdrawal period."

- **ASC**

The Component should focus on Clause 6.2.8 (Responsibilities of aquatic animal producers) and leave Clause 6.2.7 (Responsibilities of veterinarians and other aquatic animal health professionals) out of a Component that targets a Standards for producers - in a same fashion as how Clause 6.2.4 (re authorities), Clause 6.2.5 (re veterinary pharmaceutical industry) and Clause 6.2.6 (re wholesale and retail distributors) are not considered either.

Re. Guidance Text: Same remark as per Component – restrict to, or only focus on, Clause 6.2.7. Guidance requires additional requirements as component (prohibition on prophylactic use is not mentioned in Component, neither is record keeping).
Guidance includes language regarding "audit evidence" or "audit review" - this is not, and cannot, be part of a Standard (which is focus of GSSI).

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

The inclusion is relevant, for instance for the situation when there is a veterinarian within the producer's management team, as must be the case with many large operations.

GSSI Essential Component C.1.01

Component text: (Combined with C.1.02): The standard requires that the decision to treat with antimicrobial agents, and their subsequent application, is consistent with the Principles for Responsible & Prudent Use of Antimicrobial Agents in Aquatic Animals and other guidance of the OIE Aquatic Animal Health Code i.e., by the aquatic animal health professional or other relevant competent authority and in response to a diagnosed disease; see Articles 6.2.7 and 6.2.8 of the 2015 Aquatic Animal Health Code).

Guidance text: The standard is expected to prohibit prophylactic usage for growth promotion and require that all antimicrobials are used in response to a diagnosed disease (i.e., by the aquatic animal health professional or other relevant competent authority) and the audit is expected to include a review of suitable evidence (e.g., records of disease testing etc. prescriptions for treatments). The audit is expected to include a review of evidence (such as written records or through interviews) to ensure consistency with OIE guidelines (2015) Article 6.2.7 "The veterinarian or other aquatic animal health professional authorized to prescribe veterinary medicines should indicate precisely to the aquatic animal producer the treatment regime, including the dose, the treatment intervals, the duration of the treatment, the withdrawal period and the amount of antimicrobial agents to be delivered, depending on the dosage and the number of aquatic animals to be treated. The use of antimicrobial agents extra-label/off-label may be permitted in appropriate circumstances in conformity with the relevant legislation" and Article 6.2.8 "Aquatic animal producers should use antimicrobial

agents only on the prescription of a veterinarian or other aquatic animal health professional authorized to prescribe veterinary medicines, and follow directions on the dosage, method of application, and withdrawal period."

REFERENCES

Paragraphs 19, 20, & 22 of the Technical Guidelines on Aquaculture Certification
Article 6.2.7 (AAHC 2015)
Paragraph 23, 30 & 52 of the Technical Guidelines on Aquaculture Certification
OIE Aquatic Animal Health Code (AAHC) (2015). Article 6.2.7.
www.oie.int/index.php?id=171&L=0&htmfile=chapitre_antibio_resp_prudent_use.htm.

SUPPLEMENTARY COMPONENT C.1.02.01

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

- **ASC**

Suggest to remove; as OIE does not advise to prohibit the use of Highly and Critically Important Antimicrobials.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

OIE is an official reference but not the sole guiding authority here (i.e. WHO is also referenced). Also paragraph 23 of the FAO Tech Guidelines states "Veterinary medicines should be used in a responsible manner and in accordance with applicable national legislation or relevant international agreements that ensure effectiveness, safety of public and animal health and protection of the environment.

GSSI Supplementary Component C.1.02.01

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

Guidance text: The audit is expected to include a review of evidence that supports a claim of no listed antimicrobial usage, this could include independent laboratory testing results, reviews of financial records, inspections of offices and chemical storage facilities.

The most recent version of the WHO list is the 3rd edition, which can be found at www.who.int/foodsafety/publications/antimicrobials-third/en/.

REFERENCES

Paragraphs 19, 20, & 22, 23 and 52 of the Technical Guidelines on Aquaculture Certification
The Aquatic Animal Health Code (2015),

World Health Organization (WHO) (2012). Critically important antimicrobials for human medicine – 3rd Rev. ww.who.int/food safety/publications/antimicrobials-third/en/.
Serrano (2005). Responsible use of antibiotics in aquaculture. FAO Fisheries Technical Paper 469.
OIE Aquatic Animal Health Code (2015). www.oie.int/international-standard-setting/aquatic-code/.

SUPPLEMENTARY COMPONENT C.1.02.02

Component text

The standard prohibits aquatic animals treated with antimicrobials from being labelled with its standard; however, antimicrobial application deemed necessary by an aquatic health professional cannot be withheld from aquatic animals solely to preserve the certification status of the production.

- **ASC**

Suggest to remove: Product claim (instead of Standard content) is not in scope of GSSI.

- **GSSI response**

The Component text has not been changed.

Component concerns an animal health professional's opinion not the claims made about a product. The intention is to prevent denial of essential treatment of aquatic animals just to preserve a certification.

GSSI Supplementary Component C.1.02.02

Component text: The standard prohibits aquatic animals treated with antimicrobials from being labelled with its standard; however, antimicrobial application deemed necessary by an aquatic health professional cannot be withheld from aquatic animals solely to preserve the certification status of the production.

Guidance text: The audit is expected to include a review of evidence that supports a claim of no antimicrobial usage, this could include independent laboratory testing results, reviews of financial records, inspections of offices and chemical storage facilities. The standard is expected to ensure the need to treat aquatic animals is prioritized above the certification status.

Where a standard complies with the prohibition on all antimicrobial then it will also be considered in alignment with C.1.01 and C1.02 (and the corresponding inclusion of these in Supplementary Component C.1.08.2). Unlabelled products produced by the certified aquaculture facility are still expected to meet the Essential Components C.1.01 and C1.02 (and the corresponding need for compliance with them in Supplementary Component C.1.08.3).

REFERENCES

Paragraphs 19, 20, & 22, 23 and 52 of the Technical Guidelines on Aquaculture Certification
The Aquatic Animal Health Code (2015)
Serrano (2005)

OIE Aquatic Animal Health Code (2015). www.oie.int/international-standard-setting/aquatic-code/.

ESSENTIAL COMPONENT C.1.04

Component text

The standard requires that aquatic animals are kept under farming conditions suitable for the species being raised.

Guidance text

The objective of this requirement is to verify that the species is being farmed in the proper environment to maintain its health. Due to the very broad nature of this Essential Component, specific guidance cannot be provided. Expected evidence could include requirements for farm siting (including permitting for the farm site and species), aquatic health plan maintenance, assurance or monitoring aquatic animal health, on-farm water quality and temperature monitoring, etc.

- **ASC**

The Guidance contains language regarding "expected evidence", which is not part of a Standard, and is furthermore diluted by the use of working like "...could include..." which means (normatively) nothing.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

The wording of “Guidance” is not meant to have the weight of authority of that of the Component, and so is indicative – thus the qualifying word “could” in the Guidance text. The current phrasing is therefore not considered to be problematic.

A request was sent to ASC to provide a proposal for clearer language in accordance with their request. No proposal was received by GSSI.

GSSI Essential Component C.1.04

Component text: The standard requires that aquatic animals are kept under farming conditions suitable for the species being raised.

Guidance text: The objective of this requirement is to verify that the species is being farmed in the proper environment to maintain its health. Due to the very broad nature of this Essential Component, specific guidance cannot be provided. Expected evidence could include requirements for farm siting (including permitting for the farm site and species), aquatic health plan maintenance, assurance or monitoring aquatic animal health, on-farm water quality and temperature monitoring, etc.

.

REFERENCES

Paragraphs 19, 20, 22 & 26 of the Technical Guidelines on Aquaculture Certification
The Aquatic Animal Health Code (2015)

OIE Aquatic Animal Health Code (2015). www.oie.int/international-standard-setting/aquatic-code/.

ESSENTIAL COMPONENT C.1.06

Component text

The standard requires the aquaculture facility to establish, implement and maintain appropriate procedures and/or systems for the early detection of aquatic animal health issues, which include routine monitoring of stocks and the environment.

Guidance text

Appropriate procedures are expected to include general health/ behavioural inspections or testing for specific diseases with suitable monitoring (e.g., regular and including a suitable range of parameters, and of sufficient sample size to identify or anticipate disease outbreaks expediently, as well as increased surveillance when potential issues are identified.) Environmental monitoring is expected to include detection of unfavourable environmental quality factors that could adversely affect the health of the aquatic animal (e.g., water temperature and quality).

Verification is expected and could include reviews of written records and monitoring results to ensure procedures and/or systems are operational is also expected. This could also be captured in an aquatic health management plan.

- **ASC**

Requirements for system to detect diseases early include more than just monitoring. The Component is written at a too high level/too generic. Needs more explicit requirements instead of blanket approach.

Re. Guidance text: Guidance includes language on "verification", which cannot be part of the scope of a Standard, thus not within Part C.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

The current text stands because this Component is intended to achieve a key objective of health monitoring, across a wide range of species and techniques so needs to minimize the risk of exclusions. In short it needs to provide a “catch all” role to ensure that disease is detected as early as possible in order to minimize its impact and ensure timely treatment across the aquaculture industry.

In the Guidance, the inclusion of a phrase like "verification is expected" is in line with the role of guidance in assisting applicant schemes to better understand the component and its intention, providing context for examples of such verification as record-keeping by the farm including written accounts of their activities.

This Component and its Guidance are therefore considered adequate and no change is needed.

GSSI Essential Component C.1.06

Component text: The standard requires the aquaculture facility to establish, implement and maintain appropriate procedures and/or systems for the early detection of aquatic animal health issues, which include routine monitoring of stocks and the environment.

Guidance text: Appropriate procedures are expected to include general health/ behavioural inspections or testing for specific diseases with suitable monitoring (e.g., regular and including a suitable range of parameters, and of sufficient sample size to identify or anticipate disease outbreaks expediently, as well as increased surveillance when potential issues are identified.) Environmental monitoring is expected to include detection of unfavourable environmental quality factors that could adversely affect the health of the aquatic animal (e.g., water temperature and quality).

Verification is expected and could include reviews of written records and monitoring results to ensure procedures and/or systems are operational is also expected. This could also be captured in an aquatic health management plan.

REFERENCES

Paragraphs 19, 20, & 22 of the Technical Guidelines on Aquaculture Certification
The Aquatic Animal Health Code (2015),
OIE Aquatic Animal Health Code (2015). www.oie.int/international-standard-setting/aquatic-code/.

ESSENTIAL COMPONENT C.1.07

Component text

The standard requires that mortalities and moribund aquatic animals are routinely collected, where collection is a feasible practice.

Guidance text

GSSI expects this Essential Component to be applied where collection is a feasible function of good management practice (e.g., finfish grow out). Examples where this is not suitable could include where aquatic animals may be too small to effectively collect (e.g., shrimp farming). Record keeping on the numbers of, and reason for, mortalities is expected.

- **ASC**

Dead/moribund fish need to be analysed in case reason is unknown.
ASC recommends that Current Supplementary Indicator C.1.08.02 needs to become Essential.
Disposal is not covered.

Re. Guidance text: Move the "expectation" on record-keeping from the Guidance to the Component; and make it a "requirement".

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

Re analysis of mortalities – this is covered elsewhere in the BM Tool e.g. C.1.05 *"The standard requires the aquaculture facility to establish, implement and maintain appropriate procedures to respond to disease outbreaks"*

Re C1.08.02 - It is not within the scope of this revision process to convert Supplementary to Essential Components,

Guidance regarding record keeping – this is (a) clearly signalled as an expectation for this Component reinforced by (b) implications in Component C 1.11 concerning record keeping for drug and chemical usage and rationale for their use. However, that said, record keeping could in the future be added to the preface section covering generic aspects (discussed elsewhere in this review).

GSSI Essential Component C.1.07

Component text: The standard requires that mortalities and moribund aquatic animals are routinely collected, where collection is a feasible practice.

Guidance text: GSSI expects this Essential Component to be applied where collection is a feasible function of good management practice (e.g., finfish grow out). Examples where this is not suitable could include where aquatic animals may be too small to effectively collect (e.g., shrimp farming). Record keeping on the numbers of, and reason for, mortalities is expected.

REFERENCES

Paragraphs 19, 20, 22 & 51 of the Technical Guidelines on Aquaculture Certification
OIE Aquatic Animal Health Code (2015). www.oie.int/international-standard-setting/aquatic-code/

ESSENTIAL COMPONENT C.1.08

Component text

The standard requires the aquaculture facility to have operational fish health management practices. Evidence must be shown that these address the following elements (where relevant to the species, scale, and production system covered by the Standard's scope):

- Effective biosecurity
- Identification and use of suitable available vaccines
- Introductions and transfers of farmed animals (where relevant, which is overseen by an aquatic animal health professional.

Guidance text

It is expected that the standard will contain sufficient elements and/ or audit of culture practices for an operational program relative to the scale, species, and production systems covered by the standard's scope, including a focus on disease prevention (e.g. the use of vaccines). The content of the measures are expected to be overseen (but not necessarily full time employment) of an aquatic animal health professional.

- **ASC**

OIE is not explicit on the "must use" suitable/available vaccines. Stick with the Guidelines from OIE.

- **GSSI response**

Based on the Public Consultation comments, the Guidance text has been changed.

A definition for "suitable" has been included in the final Guidance text.

Re ASC comment: OIE is an authority referenced repeatedly within the BM Tool, but it is not the sole reference – also see C1.02.01 above.

GSSI Essential Component C.1.08

Component text: The standard requires the aquaculture facility to have operational fish health management practices. Evidence must be shown that these address the following elements (where relevant to the species, scale, and production system covered by the Standard's scope):

- Effective biosecurity
- Identification and use of suitable available vaccines
- Introductions and transfers of farmed animals (where relevant, which is overseen by an aquatic animal health professional.

Guidance text: It is expected that the standard will contain sufficient elements and/ or audit of culture practices for an operational program relative to the scale, species, and production systems covered by the standard's scope, including a focus on disease prevention (e.g. the use of vaccines). The content of the measures are expected to be overseen (but not necessarily full time employment) of an aquatic animal health professional.

It is expected that the standard will contain sufficient elements and/ or audit of culture practices for an operational program relative to the scale, species, and production systems covered by the standard's scope, including a focus on disease prevention (e.g. the use of vaccines). The content of the measures are expected to be overseen (but not necessarily full time employment) of an aquatic animal health professional. Suitable vaccines are defined as those that have been shown to be effective against diseases that negatively impact the species and production system concerned and that can be used economically.

REFERENCES

Paragraphs 19, 20, & 22 of the Technical Guidelines on Aquaculture.

SUPPLEMENTARY COMPONENT C.1.08.01

Component text

The standard requires the aquaculture facility to appropriately review the Aquatic Health Management Plan.

- **ASC**

Pointless Component - OIE does not require an "AAHMP", and if keeping management systems is Supplementary Component instead of an Essential Component, then the meaning of "management system" is not understood. Suggest to remove.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

OIE is an official reference but not the sole guiding authority on this matter - also see C1.02.01 above. The requirement is silent concerning the need to have a management plan (implied in C1.08), but simply requires its review.

GSSI Supplementary Component C.1.08.01

Component text: The standard requires the aquaculture facility to appropriately review the Aquatic Health Management Plan.

Guidance text: Verification is expected. Appropriate timing for reviews are expected and could include annual reviews, reviews following specific disease outbreaks or at the end of a production cycle.

REFERENCES

Paragraphs 19, 20, & 22 of the Technical Guidelines on Aquaculture Certification.

SUPPLEMENTARY COMPONENT C.1.08.02

Component text

The standard requires the aquaculture facility to determine the cause of death when losses are significantly greater than expected and the cause is unclear, and to use laboratory analysis where feasible.

Guidance text

Verification that policies or other systems are in place to respond to these situations is expected.

- **ASC**

See C.1.07 ("Dead/moribund fish need to be analysed in case reason is unknown.
ASC recommends that Current Supplementary Indicator C.1.08.02 needs to become Essential.
Disposal is not covered").

Re. Guidance text: Guidance cannot contain requirements re "verification".

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

Changing Supplementary Components to Essential Component is not the objective of this revision. Because the mention of verification is in the Guidance not the Component, it seems reasonable to the EWG that expectation of verification should be mentioned.

GSSI Supplementary Component C.1.08.02

Component text: The standard requires the aquaculture facility to determine the cause of death when losses are significantly greater than expected and the cause is unclear, and to use laboratory analysis where feasible.

Guidance text: Verification that policies or other systems are in place to respond to these situations is expected.

REFERENCES

Paragraphs 19, 20, & 22 of the Technical Guidelines on Aquaculture Certification.

SUPPLEMENTARY COMPONENT C.1.08.03

Component text

The standard requires the aquaculture facility to establish, implement, and maintain a written Aquatic Animal Health Management Plan (AAHMP) which is overseen by an aquatic animal health professional, and at a minimum, is compliant with the following GSSI Components; C.1.01, C.1.02, C.1.03, C.1.04, C.1.05, C.1.06, C.1.07, C.1.08, C.1.09, C.1.10, C.1.11.

- **ASC**

AAHMP is already required under C.1.08. Further, OIE does not require an AAHMP, only a Biosecurity Plan and Contingency Plan.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

C1.08 implies developing a plan but does not explicitly require this ("*operational fish health management practices*" are required).

OIE is a recognised BM Tool reference but not the sole guiding authority on this matter - also see C1.02.01 above.

GSSI Supplementary Component C.1.08.03

Component text: The standard requires the aquaculture facility to establish, implement, and maintain a written Aquatic Animal Health Management Plan (AAHMP) which is overseen by an aquatic animal health professional, and at a minimum, is compliant with the following GSSI Components; C.1.01, C.1.02, C.1.03, C.1.04, C.1.05, C.1.06, C.1.07, C.1.08, C.1.09, C.1.10, C.1.11.

Guidance text: Verification that the farm has a written AAHMP, and that the content covers the necessary content and that it is fully in operation and frequently reviewed is expected. Evidence of oversight could include an interview with the health professional or a signature on the documents.

Aligned standards will also be considered in alignment with C.1.01, C.1.02, C.1.03, C.1.04, C.1.05, C.1.06, C.1.07, C.1.08, C.1.09, and C.1.10.

REFERENCES

Paragraphs 19, 20, & 22 of the Technical Guidelines on Aquaculture Certification.

SUPPLEMENTARY COMPONENT C.1.08.07

Component text

The standard requires suitable performance based metric limits on survival rate (or similar system that incorporates survival rates (e.g. recovery rate)) or similar criteria that demonstrate that the aquatic health management practices are effective.

Guidance text

A suitable performance based metric limit could include those set on a species specific basis using industry average data (e.g., a minimal % relative to say industry average data) or based on farm monitoring records. Other possible criteria may include metric limits on veterinary drug usage. Verification that the metric limits have been met and set based on a suitable monitoring and record keeping system is expected.

Aligned standards will also be considered in alignment with C.1.08.02 and C.1.08.6.

- **ASC**

Remove - no basis for in reference documents.
Re. Guidance Text: See comment re Component.
Guidance also included limits on veterinary drug use….which does not relate (at all) to survival rate.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

The Component is a reasonable response to The Technical Guidelines on Aquaculture Certification (TGAC), paragraph 22, 2nd bullet point which requires "*Routine monitoring of stock and environmental conditions for early detection of aquatic animal health problems"* and those of related TGAC items.

Re Guidance - It is conceivable that reduced veterinary drug usage can be an indicator of improved survival performance (e.g. pointing to reduced need for prophylaxis/treatment to prevent mortalities) – and is anyway not suggested exclusively as an indicator.

GSSI Supplementary Component C.1.08.07

Component text: The standard requires suitable performance based metric limits on survival rate (or similar system that incorporates survival rates (e.g. recovery rate)) or similar criteria that demonstrate that the aquatic health management practices are effective.

Guidance text: A suitable performance based metric limit could include those set on a species specific basis using industry average data (e.g., a minimal % relative to say industry average data) or based on farm monitoring records. Other possible criteria may include metric limits on veterinary drug usage. Verification that the metric limits have been met and set based on a suitable monitoring and record keeping system is expected.

Aligned standards will also be considered in alignment with C.1.08.02 and C.1.08.6.

REFERENCES

Paragraphs 19, 20, & 22 of the Technical Guidelines on Aquaculture Certification.

SUPPLEMENTARY COMPONENT C.1.08.08

Component text

The standard requires that a legally binding, appropriately defined, and operational area management system is in place that ensures that all participant aquaculture facilities use common and, where applicable, coordinated practices for the shared management of aquatic animal disease risk.

Guidance text

Not applicable where the aquaculture facility is physically or sufficiently isolated that disease transfer is highly unlikely. Common practices for the shared management of aquatic animal disease risk are expected to include suitable requirements to prevent disease outbreaks, share disease status information, and, where appropriate, coordinate response actions in the presence of a disease, such as the use of veterinary drugs. Requirements are expected to be enforced through an agreement with the regulator or legally binding agreement of the producers in the area (e.g. an MOU or similar document). An appropriately defined area is expected to have boundaries that are defined according to the ability to realistically manage aquatic disease risk within it. Verification is expected to include a review evidence of the presence of the system and the common and coordinated practices applied (e.g., such as written records, meeting notes, contractual agreements and/or interviews).

- **ASC**

A MoU is NOT legally binding. Furthermore, it is explicitly designed not to be so.
https://dictionary.thelaw.com/memorandum-of-understanding/

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

However it is defined by the dictionary, the MOU is taken by many as legally binding (or if the parties involved so define it – it would have little use otherwise). As the component clearly requires a legally binding arrangement, then in legislative regimes where the MOU is not regarded as binding, its relevance as a reference automatically falls away. Furthermore, this is in the Guidance – were it within the Component it arguably would require removal.

GSSI Supplementary Component C.1.08.08

Component text: The standard requires that a legally binding, appropriately defined, and operational area management system is in place that ensures that all participant aquaculture facilities use common and, where applicable, coordinated practices for the shared management of aquatic animal disease risk.

Guidance text: Not applicable where the aquaculture facility is physically or sufficiently isolated that disease transfer is highly unlikely. Common practices for the shared management of aquatic animal disease risk are expected to include suitable requirements to prevent disease outbreaks, share disease status information, and, where appropriate, coordinate response actions in the presence of a disease, such as the use of veterinary drugs. Requirements are expected to be enforced through an agreement with the regulator or legally binding agreement of the producers in the area (e.g. an MOU or similar document). An appropriately defined area is expected to have boundaries that are defined according to the ability to realistically manage aquatic disease risk within it. Verification is expected to include a review evidence of the presence of the system and the common and coordinated practices

applied (e.g., such as written records, meeting notes, contractual agreements and/or interviews).

REFERENCES

Paragraph 17j, 19, 21, 23, & 52 of the Technical Guidelines on Aquaculture Certification
Principle 1 of the Technical Guidelines on the Ecosystem Approach to Aquaculture.

ESSENTIAL COMPONENT C.1.10

Component text

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 the aquaculture facility and between it and natural aquatic fauna.

- **ASC**

Needs to be (already) captured by the Biosecurity Plan.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

It is unclear what the expected change or response required here is. Following a request for further explanation by ASC, no response was received.

GSSI Essential Component C.1.10

Component text: 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 the aquaculture facility and between it and natural aquatic fauna.

Guidance text: Appropriate procedures or systems are expected to address both on farm disease and parasite transfer (such as the ability to quarantine diseased stocks, separating equipment) as well as between the facility and natural fauna (such as disinfection of effluents for diseased stocks, fallowing). The approach taken would be expected to be relevant to the species, production system, scale of production, and legal requirements. Can be “not applicable” with suitable justification provided by the scheme.

Where pathogens or parasites are a known concern (for example, sea lice on farmed salmon); Appropriate procedures or systems are expected to include specific requirements or actions defined in the standard or specified by the aquaculture facility through a suitable risk assessment or other evidence such as local or national regulations. Appropriate management measures in these cases could include treatment trigger levels of parasite numbers on the farm-facility or siting requirements that require that the aquaculture facility is located at suitable distances from wild populations.

Verification that the management measures are suitable and employed is expected.

REFERENCES

Paragraphs 19, 20, & 22 of the Technical Guidelines on Aquaculture Certification.

SUPPLEMENTARY COMPONENT C.1.10.01

Component text

Where the production system allows the discharge of parasites that are a known concern to local wildlife, the standard requires monitoring and adapting farming practices based on parasite prevalence on wild fish.

Guidance text

Examples of pathogens or parasites that are a known concern include sea lice on farmed salmon; appropriate practices could be specified in the standard or a suitable risk assessment or other justification could be given to determine whether or not this Supplementary Component is applicable.

The certification scheme or standard is expected to address the monitoring of pathogen or parasite numbers on wild fish or a similar system that is likely to be effective at finding evidence of impact if it's occurring (possibly performed by third parties or government), and that appropriate trigger limits (e.g., expert opinions, scientific literature) and adaptive management plans exist and are employed to reduce the pressure on wild populations (such as by treating fish, fallowing, etc.).

Verification that the system is operational is also expected.

Aligned standards will also be considered in alignment with C.1.10.

- **ASC**

- Scope issue, seems to focus a lot on salmon lice, whilst other parasites are ignored.
- Achievability issue, sampling wild fish and making causal relationship, proofed in scientific writing, between a single farm release of parasites and wild population increase is near impossible – and beyond the range of a farm to do so.
- Re. remark in Column M, rising wild lice levels on stocks adjacent to farm, excludes many other factors that contribute.
- Suggest to remove.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

In response to the comment, there will be no change to the Component or Guidance text for several reasons:

- Only the Guidance text is salmon-orientated, but the Component text is generic.
- The un-achievability issue is not considered to be problematic, since the text includes wording "where this is feasible" for practical application.
- This is a Supplementary Component and therefore also drafted more with aspiration in mind, looking towards improving monitoring technology.

GSSI Supplementary Component C.1.10.01

Component text: Where the production system allows the discharge of parasites that are a known concern to local wildlife, the standard requires monitoring and adapting farming practices based on parasite prevalence on wild fish.

Guidance text: Examples of pathogens or parasites that are a known concern include sea lice on farmed salmon; appropriate practices could be specified in the standard or a suitable risk assessment or other justification could be given to determine whether or not this Supplementary Component is applicable.

The certification scheme or standard is expected to address the monitoring of pathogen or parasite numbers on wild fish or a similar system that is likely to be effective at finding evidence of impact if it's occurring (possibly performed by third parties or government), and that appropriate trigger limits (e.g., expert opinions, scientific literature) and adaptive management plans exist and are employed to reduce the pressure on wild populations (such as by treating fish, fallowing, etc.).

Verification that the system is operational is also expected.

Aligned standards will also be considered in alignment with C.1.10

REFERENCES

Paragraphs 19, 20, & 22 of the Technical Guidelines on Aquaculture Certification.

ESSENTIAL COMPONENT C.1.11

Component text

The standard requires the aquaculture facility to maintain records on veterinary drug and chemical usage and the rationale for their use.

Guidance text

Verification that suitable records are maintained is expected. Suitable records are expected to include type, concentration, and dosage, method of administration and withdrawal times of chemicals and veterinary drugs and the rationale for their use.

- **ASC**

Please note that in first section "off-label" is allowed….which makes recording complicated….
Also, guidance is not in line with OIE.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

No change to the Component or Guidance text, because the issue raised is unclear and following a request for clarification to ASC, no further explanation was provided.

GSSI Essential Component C.1.11

Component text: The standard requires the aquaculture facility to maintain records on veterinary drug and chemical usage and the rationale for their use.

Guidance text: Verification that suitable records are maintained is expected. Suitable records are expected to include type, concentration, and dosage, method of administration and withdrawal times of chemicals and veterinary drugs and the rationale for their use.
.

REFERENCES

Paragraph 33 of the Technical Guidelines on Aquaculture Certification.

ESSENTIAL COMPONENT C.2.01

Component text

The standard requires the establishment, implementation and maintenance of an appropriate system for the application of chemicals and veterinary drugs.

- **ASC**

Not in agreement. What does this Component add compared to earlier Components re vet oversight and application & record keeping?

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

This Component is deliberately general to function as a catch-all component, specifically designed to ensure applicability across a wide range of diverse species and technologies involved. Additionally, it is phrased in a manner that should ensure that its relevance will persist into the future as technology evolves.

GSSI Essential Component C.2.01

Component text: The standard requires the establishment, implementation and maintenance of an appropriate system for the application of chemicals and veterinary drugs.

Guidance text: An appropriate system could conform to the relevant sections of Article 6.2.7 and 6.2.8 of the Aquatic Animal Health Code (2015) (www.oie.int/index.php?id=171&L=0&htmfile=chapitre_antibio_resp_prudent_use.htm) or other suitable reference. The system is expected to ensure that the application of the product follows the instructions of the manufacturer or other competent authority. Verification that the system is operational is also expected.

REFERENCES

Paragraph 19 of the Technical Guidelines on Aquaculture Certification

The Aquatic Animal Health Code (2015).

ESSENTIAL COMPONENT C.2.02

Component text

The standard requires appropriate controls for all chemicals, incl. veterinary drugs, that enter the environment during or after use (whether already covered by GSSI Essential Components or not) in order to minimize adverse impacts on environmental quality. Manufacturer's guidance or equivalent directions should be followed, and where appropriate, chemicals that pose a high risk of adverse impacts to environmental quality should be specifically defined by the standard.

Guidance text

It is expected that the standard will require all chemicals used by the aquaculture facility and that will enter the environment are at least used according to the manufacturer's guidance (such as on label requirements or Safety Data Sheets (SDS) or, in the case of veterinary drugs, the guidance of the aquatic animal health professional to prevent adverse impacts upon the environment.
Chemicals that pose a high risk of adverse impacts to environmental quality which should be specifically defined by the standard (e.g., copper-based anti-foulant treatments in marine cage aquaculture or anti-parasite or anti-microbe bath treatments) or identified through a risk based self-assessment by the farmer (e.g., an environmental risk assessment)-- it is expected that the standard or the risk-assessment will define any necessary additional requirements to minimize the impacts (e.g., EQS limits for copper residues in the benthic environment).

- **ASC**

Listing individual approved chemicals in a normative document will not work as new substances keep appearing & lists can be lengthy.

- **GSSI response**

Based on ASC's comment, the Component and Guidance text has been changed.

To allow flexibility so that rapid change in the perceived range of high-risk chemicals can be accommodated, the Component and Guidance text will be changed. Additionally, there will be a reference to a classification system as an example of an acceptable reference.

GSSI Essential Component C.2.02

Component text: The standard requires appropriate controls for all chemicals, incl. veterinary drugs, that enter the environment during or after use (whether already covered by GSSI Essential Components or not) in order to minimize adverse impacts on environmental quality. Manufacturer's guidance or equivalent directions should be followed, and where appropriate, relevant examples of chemicals that pose a high risk of adverse impacts to environmental quality should be specifically defined by the standard.

Guidance text: It is expected that the standard will require all chemicals used by the aquaculture facility and that will enter the environment are at least used according to the manufacturer's guidance (such as on label requirements or Safety Data Sheets (SDS) or, in

the case of veterinary drugs, the guidance of the aquatic animal health professional to prevent adverse impacts upon the environment.
Chemicals that pose a high risk of adverse impacts to environmental quality which should be specifically defined by the standard (e.g., copper-based anti-foulant treatments in marine cage aquaculture or anti-parasite or anti-microbe bath treatments) accepting that perceptions regarding high risk and the chemicals involved are subject to rapid change, or identified through a risk based self-assessment by the farmer (e.g., an environmental risk assessment) or through reference to a recognized relevant classification system (e.g. the UN Globally Harmonized System of Classification and Labelling of Chemicals (GHS)). It is expected that the standard or the risk-assessment will define any necessary additional requirements to minimize the impacts (e.g., EQS limits for copper residues in the benthic environment).

REFERENCES

Paragraph 52 of the Technical Guidelines on Aquaculture Certification.

SUPPLEMENTARY COMPONENT C.2.02.01

Component text

The standard prohibits use of chemicals within the aquaculture facility that may enter the local environment due to farming practices that are listed as highly polluting by relevant organizations or other justification.

Guidance text

Relevant organizations could include the World Health Organization listed 1a and 1b pesticides (see www.who.int/ipcs/publications/pesticides_hazard_2009.pdf?ua=1) and the Rotterdam Convention Annex III listed chemicals (see www.pic.int/TheConvention/Chemicals/AnnexIIIChemicals/tabid/1132/language/en-US/Default.aspx). The Stockholm Convention on Persistent Organic Pollutants (POPs) (2001) and the Rotterdam Convention are also relevant organisations alongside WHO.
Verification is expected to include a review of evidence supporting the claim of no use, such as inspection of the chemical storage, interviews etc.

- **ASC**

Simplify Component by listing the conventions in the Component instead of in the Guidance.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

This and other Components need to be "catch-all" and as "future proofed" as possible in order to ensure the BM Tool can retain relevance as the industry evolves and changes. Specific relevant organizations that may change over time (e.g. change their name, be replaced, be closed down, etc) are accordingly mostly specified in the Guidance.

GSSI Supplementary Component C.2.02.01

Component text: The standard prohibits use of chemicals within the aquaculture facility that may enter the local environment due to farming practices that are listed as highly polluting by relevant organizations or other justification.

Guidance text: Relevant organizations could include the World Health Organization listed 1a and 1b pesticides (see www.who.int/ipcs/publications/pesticides_hazard_2009.pdf?ua=1) and the Rotterdam Convention Annex III listed chemicals (see www.pic.int/TheConvention/Chemicals/AnnexIIIChemicals/tabid/1132/language/en-US/Default.aspx).
The Stockholm Convention on Persistent Organic Pollutants (POPs) (2001) and the Rotterdam Convention are also relevant organisations alongside WHO.
Verification is expected to include a review of evidence supporting the claim of no use, such as inspection of the chemical storage, interviews etc.

REFERENCES

Paragraph 52 of the Technical Guidelines on Aquaculture Certification.

SUPPLEMENTARY COMPONENT C.2.02.02

Component text

The standard requires that chemicals used on the aquaculture facility, and that may enter the local environment, are restricted to identified environmentally benign products (e.g., rapidly denaturing chemicals), with a suitable justification for their listing as benign.

- **ASC**

Too ambiguous.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

It is difficult to respond to a generalized comment, but, as elsewhere in the GBT, Components avoid specificity where possible as to avoid risk of unwarranted exclusions or inclusions whilst setting out the core aim of the Component.

GSSI Supplementary Component C.2.02.02

Component text: The standard requires that chemicals used on the aquaculture facility, and that may enter the local environment, are restricted to identified environmentally benign products (e.g., rapidly denaturing chemicals), with a suitable justification for their listing as benign.

Guidance text: Suitable justification is expected to include scientific literature or product description. Verification, including a review of evidence supporting the claim, such as inspection of the chemical storage, interviews are also expected.

Aligned standards will also be considered in alignment with C.2.02.1.

REFERENCES

Paragraph 52 of the Technical Guidelines on Aquaculture Certification.

ESSENTIAL COMPONENT C.3.01

Component text

The standard requires that the aquaculture facility and its daily operations ensure that good culture and hygienic conditions are maintained. Relevant aspects include proper management of all chemicals, fuels and feeds including their safe storage.

- **ASC**

New (and old) language is too ambiguous. Suggest to split the topics up, specify what exactly is required and re-allocate them to the relevant sections in Part C.
Parts of Paragraph 34 are not mentioned (while in FAO Code).
Paragraph 52 is irrelevant as this relates to proper use, and not storage.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

No further change to this Component is recommended because this is another Component designed to ensure applicability across a wide range of diverse species and technologies - in short a catch-all to ensure comprehensive relevance and to ensure that the Tech Guidelines on Aquaculture Certification can all be responded to as the industry evolves. TGAC paragraph 52 implies competent storage in its mention of “responsible use” within an environmental context.

GSSI Essential Component C.3.01

Component text: The standard requires that the aquaculture facility and its daily operations ensure that good culture and hygienic conditions are maintained. Relevant aspects include proper management of all chemicals, fuels and feeds including their safe storage.

Guidance text: This is a general Essential Component that covers a range of potential issues depending on the type of production system, species being cultured, and the local environment, and as such there is a need for flexibility in how consistency is achieved. It is expected that the following issues would be addressed and the systems verified to be operational:

- Appropriate storage of chemicals and fuel (e.g., stored in a lockable, labeled facility, limited access by personnel, leakage prevention - all based on Safety Data Sheets (SDS) (see figure 4.14 of the A Guide to The Globally Harmonized System of Classification and Labeling of Chemicals (GHS), available at: www.osha.gov/dsg/hazcom/ghsguideoct05.pdf)
- Appropriate storage of feed (e.g., stored separately from sources of contamination, accurately labelled, keeping medicated and nonmedicated feed separated.)

- Appropriate pest control (e.g., prevent contamination of feed, chemicals by rodents or insects etc.)
- Domestic sewage control/disposal to avoid local contamination
- General farm waste (e.g., empty feed bags, household rubbish, food containers etc.).

REFERENCES

Paragraph 29, 34 & 52 of the Technical Guidelines on Aquaculture Certification

SUPPLEMENTARY COMPONENT C.3.01.01

Component text
The standard requires the presence of an active and documented recycling program.

Guidance text
The system is expected to ensure the farm recycles to the maximum extent practicable.

- **ASC**

Guidance refers to expected audit evidence - not part of Standard.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

It is unclear how the comment relates to the Guidance of this Component.

GSSI Supplementary Component C.3.01.01

Component text: The standard requires the presence of an active and documented recycling program.

Guidance text: The system is expected to ensure the farm recycles to the maximum extent practicable.

REFERENCES

Paragraph 51 of the Technical Guidelines on Aquaculture Certification.

SUPPLEMENTARY COMPONENT C.3.01.02

Component text
The standard requires the aquaculture facility to establish, implement and maintain a general waste management system.

- **ASC**

Component needs to become Essential as otherwise the FAO Paragraph 51 will not be enforced.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

The addition of Essential Components, nor changing the status of existing Supplementary Components to "Essential", is not the objective of this revision process.

GSSI Supplementary Component C.3.01.02

Component text: The standard requires the aquaculture facility to establish, implement and maintain a general waste management system.

Guidance text: An appropriate system is expected to include a baseline of waste generation and actions aimed at reductions, and suitable monitoring. Verification is expected to include a review of evidence that the system is operational and fit for the purpose.

REFERENCES

Paragraph 51 of the Technical Guidelines on Aquaculture Certification.

ESSENTIAL COMPONENT C.3.02

Component text

The standard requires that aquaculture facility infrastructure is appropriately maintained in order to prevent negative environmental impacts, whether from construction, operation or decommissioning (e.g., including the requirement for derelict equipment and materials to be collected and disposed of responsibly.)

- **ASC**

"Preventing negative impacts" is (way) too ambiguous. Especially if the Component highlights (or focuses?) only on derelict materials.
C.3.01.02 requires a (supplementary) waste management plan – derelict farming material = waste…..thus can be included in WMP.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

This Component is deliberately vague to function as a catch-all Component, specifically designed to ensure applicability across a wide range of diverse species and technologies. Additionally, it is phrased in a manner that ensures relevance that persists into the future as technology evolves. C3.01.02 refers to implementing and maintaining as system rather than a planning process.

GSSI Essential Component C.3.02

Component text: The standard requires that aquaculture facility infrastructure is appropriately maintained in order to prevent negative environmental impacts, whether from construction, operation or decommissioning (e.g., including the requirement for derelict equipment and materials to be collected and disposed of responsibly.)

Guidance text: Given the wide variety of production systems in aquaculture specific guidance cannot be provided and flexibility by the evaluator is required using a risk-based approach. Examples could include the requirement for derelict or damaged gear in shellfish or cage aquaculture to be collected and disposed of responsibly, or for that waste from pond construction is not placed in mangrove forests in shrimp farming. It is expected that specific requirements or risk-based management systems would be required where appropriate, along with suitable verification. These requirements may also be included in other Standards, such as sensitive habitat protection or escape prevention.

REFERENCES

Paragraph 51 of the Technical Guidelines on Aquaculture Certification.

ESSENTIAL COMPONENT C.4.01

Component text

The standard requires the aquaculture facility to source 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.

Guidance text

The audit must include a review of evidence which could include self declaration by the feed manufacturer.

- **ASC**

Re. Component Text: Wording-issue: "can source" means something else than "must/shall source".
Next to country of landing, fishery involved is relevant as well.
Use "Marine Ingredients" instead of FM/FO

Re. Guidance text: Expected evidence is not part of a Standard.

- **GSSI response**

Based on ASC's comment, the Component text has been changed.

Additional text has been included in the final Component text to make clear that fishmeal & fish oil are examples of "aquatic feed ingredients".

Re the rigour in Component language: the wording is "requires ... to source", not "can source", so it is rigorous.
Re Specifying fishery - this was not the original intention of this Component.
Re Guidance regarding "expected evidence" – its role is to provide examples along these lines.

GSSI Essential Component C.4.01

Component text: The standard requires the aquaculture facility to source feed from a manufacturer that can trace aquatic feed ingredients including fish meal and fish oil (>1% inclusion) to the species and, at least, to the country of origin.

Guidance text: The audit must include a review of evidence which could include self declaration by the feed manufacturer.

REFERENCES

Paragraph 17g & 52 of the Technical Guidelines on Aquaculture Certification.
Aquaculture Development 5. Use of Wild Fish as Feed in Aquaculture (FAO, 2011)

ESSENTIAL COMPONENT C.4.02

Component text

The standard requires the aquaculture facility to source feed from a manufacturer who produces feed that excludes fishmeal and fish oil from endangered species and is validated as such.

- **ASC**

Validation that the feed mill excluded ETP species is good….but can't be required from a farm (Standard). Scope issue….farm standard vs. feed Standard.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

No change to the Component text has been made since it is not considered problematic. Following the ASC comment, a request has been sent to propose a language change that would address their comment. No response was received.

GSSI Essential Component C.4.02

Component text: The standard requires the aquaculture facility to source feed from a manufacturer who produces feed that excludes fishmeal and fish oil from endangered species and is validated as such.

Guidance text: Verification is expected to include a review of evidence (e.g., documentation, self-declaration by the feed manufacturer). The standard is expected to apply to other relevant marine feed ingredients (e.g., algae, krill, and squid) and to whole fish and fishery by-products.

Endangered species are expected to be defined in the Standard, with reference to relevant national listings (e.g., Vietnam's Red Data Book) and/or global listing organizations such as CITES (Appendix 1), IUCN Red List (Categories Critically Endangered (CR), Endangered (EN), Vulnerable (VU)). See www.iucnredlist.org and www.cities.org for more information.

REFERENCES

Paragraph 17g & 52 of the Technical Guidelines on Aquaculture Certification
FAO's Aquaculture Development 5. Use of Wild Fish as Feed in Aquaculture (FAO, 2011).

ESSENTIAL COMPONENT C.4.03

Component text

The standard requires the aquaculture facility to source feed from a manufacturer that prohibits the use of fishmeal and fish oil from illegal, unreported, and unregulated fishing (I.U.U.).

- **ASC**

Prohibiting an illegal act is meaningless as all would agree to it. Better to talk about that needs to be done in order to minimize risk of IUU inclusion as it otherwise becomes a blanket statement.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

The fact that such activity is illegal required reinforcement to comply with the FAO Aquaculture Technical Guidelines & Code of Conduct for Responsible Fisheries. How to progress this in practice is admittedly very important - but that is not a benchmarking matter relevant here.

GSSI Essential Component C.4.03

Component text: The standard requires the aquaculture facility to source feed from a manufacturer that prohibits the use of fishmeal and fish oil from illegal, unreported, and unregulated fishing (I.U.U.).

Guidance text: Verification is expected to include a review of evidence (e.g., documentation, self-declaration by the feed manufacturer). The standard is expected to apply to other relevant marine feed ingredients (e.g., algae, krill, and squid) and to whole fish and fishery by-products.

REFERENCES

Paragraph 17g & 52 of the Technical Guidelines on Aquaculture Certification
FAO's Aquaculture Development 5. Use of Wild Fish as Feed in Aquaculture (FAO, 2011).

ESSENTIAL COMPONENT C.4.04

Component text

The standard requires that the aquaculture facility to source 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.

- **ASC**

No grounding in FAO Code on this Component (at all). Suggest to remove.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

Implied by the Technical Guideline (TGAC) paragraph 52 requirement "Feeds ... should be used responsibly to minimize their adverse impacts on the environment.". Also addressed at length in FAO

Technical Guidelines for Responsible Fisheries: Aquaculture Development, Supplement 5. Use of Wild Fish as Feed in Aquaculture.

GSSI Essential Component C.4.04

Component text: The standard requires that the aquaculture facility to source 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.

Guidance text: Verification is expected to include a review of evidence (e.g., documentation, self-declaration by the feed manufacturer). The standard is expected to apply to other relevant marine feed ingredients (e.g., algae, krill, and squid) and to whole fish and fishery by-products.

REFERENCES

Paragraph 17g & 52 of the Technical Guidelines on Aquaculture Certification
FAO (2011) Aquaculture Development 5. Use of Wild Fish as Feed in Aquaculture.

ESSENTIAL COMPONENT C.4.06

Component text

The standard prohibits aquatic feed protein from the same species and genus as the species being farmed.

- **ASC**

Paragraph 52 does not prohibit feeding protein within the same species.
Also, no scientific literature (at all) is available to confirm this perceived risk in aquaculture.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

Following the EWG comments focusing on the need to apply the precautionary principle after experiences like that of "madcow" disease as well as clear statements regarding its unacceptability in a relevant FAO publication on this issue (Principle 9, Guideline 9.1 in FAO Technical Guidelines for Responsible Fisheries: Aquaculture Development, Supplement 5. Use of Wild Fish as Feed in Aquaculture), no change to the Component or Guidance text will be made.

GSSI Essential Component C.4.06

Component text: The standard prohibits aquatic feed protein from the same species and genus as the species being farmed.

Guidance text: Verification is expected to include a review of evidence (e.g., documentation, self-declaration by the feed manufacturer).

REFERENCES

Paragraph 52 of the Technical Guidelines on Aquaculture Certification
FAO (2011) Aquaculture Development. 5. Use of Wild Fish as Feed in Aquaculture Principle 9.1

ESSENTIAL COMPONENT C.4.07

Component text
Where applicable, the standard requires that the aquaculture facility has suitable measures in place to ensure that feed is used efficiently at the individual production unit level.

Guidance text
Suitable measures are expected to be part of a wider feed management system, such as the measurement of FCR (Feed Conversion Ratio) and FIFO (Fish-In vs. Fish Out) as well as documented records of visual feed response and staff training. Verification that the measures are operational and fit for purpose is also expected.

- **ASC**

Incomplete rationale. FIFO is a whole different issue compared to FCR or other means to efficiently address feed use.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

In respect of this comment, no change will be made to the Component or Guidance text. This Component concerns the efficient use of feed, so FCR as well as FIFO is a relevant indicator. They are clearly different but both are mentioned here because they collectively provide an indication of efficient use of aquatic feed ingredients. Moreover, both are suggested indicatively in the Guidance, not the Component.

GSSI Essential Component C.4.07

Component text: Where applicable, the standard requires that the aquaculture facility has suitable measures in place to ensure that feed is used efficiently at the individual production unit level.

Guidance text: Suitable measures are expected to be part of a wider feed management system, such as the measurement of FCR (Feed Conversion Ratio) and FIFO (Fish-In vs. Fish Out) as well as documented records of visual feed response and staff training. Verification that the measures are operational and fit for purpose is also expected.

REFERENCES

Paragraph 33 & 52 of the Technical Guidelines on Aquaculture Certification

ESSENTIAL COMPONENT C.4.08

Component text

The standard requires that feed, feed additives, feed ingredients, and fertilizers used are compliant with relevant national and local laws (integrated in C.9.01).

- **ASC**

Feed Standard/mill requirement. Not a farm/producer requirement.

- **GSSI response**

This Component has been replaced by Essential Component C9.01.

In respect of this comment, no change will be made to the Component or Guidance text. This Component concerns a requirement for the farm to source feed that is produced according to national and local legislation. The responsibility then resides with the farm to source feed appropriately and is not directed towards the feed supplier themselves.

GSSI Essential Component C.4.08

Component text: The standard requires that feed, feed additives, feed ingredients, and fertilizers used are compliant with relevant national and local laws (integrated in C.9.01)

Replaced by Essential Component C9.01

Guidance text: Verification is expected to include a review of evidence (e.g., documentation, self-declaration by the feed manufacturer).

Replaced by Essential Component C9.01

REFERENCES

Paragraphs 17a, 17b, and 37 of the Technical Guidelines on Aquaculture Certification

ESSENTIAL COMPONENT C.5.01

Component text

For cage production systems, the standard requires appropriate management measures for preventing excessive impacts of aquaculture facility waste on benthic environments, including impacts of a biological, chemical or physical nature. Where acceptable levels of impact are exceeded, there should be provision for sanctions.

Guidance text

Appropriate measures for marine cage production systems are expected to consider biological, chemical and physical impacts and additional chemical residues resulting from culture practices and should use appropriate sampling methods. Where relevant, they should conform to ISO 16665. The use of systems combining suitable allowable zones of effect and environmental quality standards (EQS) of effect are expected. Verification that the measures are operational and fit for purpose is expected. Evidence of the prevention of adverse impacts could include comparisons with baseline conditions, reference locations, or standardized limits with a suitable justification for their use. Where adverse impacts are detected it is expected that appropriate mitigation measures/ remedial action for

the identified adverse impacts on the surrounding natural ecosystem are applied. Sanctions that address situations where EQS' are exceeded and there is no effective remediation within a suitable timeframe could include withholding certification.
While generally recognized as a marine cage issue, benthic impacts can also occur in freshwater cage systems. The degree of management measures should reflect the degree of potential impacts relative to the environment, production system, species, and size of production.

- **ASC**

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.

- **GSSI response**

Based on the Public Consultation comments, the Component text has been changed.

The requirement for sanctions has been removed from the Component text for consistency of language within the Benchmark Tool.

.

GSSI Essential Component C.5.01

Component text: For cage production systems, the standard requires appropriate management measures for preventing excessive impacts of aquaculture facility waste on benthic environments, including impacts of a biological, chemical or physical nature. ~~Where acceptable levels of impact are exceeded, there should be provision for sanctions.~~

Guidance text: Appropriate measures for marine cage production systems are expected to consider biological, chemical and physical impacts and additional chemical residues resulting from culture practices and should use appropriate sampling methods. Where relevant, they should conform to ISO 16665. The use of systems combining suitable allowable zones of effect and environmental quality standards (EQS) of effect are expected. Verification that the measures are operational and fit for purpose is expected. Evidence of the prevention of adverse impacts could include comparisons with baseline conditions, reference locations, or standardized limits with a suitable justification for their use. Where adverse impacts are detected it is expected that appropriate mitigation measures/ remedial action for the identified adverse impacts on the surrounding natural ecosystem are applied. Sanctions that address situations where EQS' are exceeded and there is no effective remediation within a suitable timeframe could include withholding certification.
While generally recognized as a marine cage issue, benthic impacts can also occur in freshwater cage systems. The degree of management measures should reflect the degree of potential impacts relative to the environment, production system, species, and size of production.

REFERENCES

Paragraph 45 & 46 of the Technical Guidelines on Aquaculture Certification

ESSENTIAL COMPONENT C.6.03

Component text

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 that of the wider ecosystem. This requires a documented management approach that ensures those wild populations are not overfished and not subject to recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible, and avoids, minimizes or mitigates fishing impacts on essential habitats and on habitats that are highly vulnerable to damage by the fishing gear;
- Avoids the use of environmentally damaging collection practices;
- And ensures that the source fishery is regulated by an appropriate authority.

Guidance text

Expected examples of “justifiable use” include where there is a lack of commercially-available hatchery-raised seed, inability/lack of technology to hatchery-raised the farmed species, or passive collection of molluscs. Justification could be offered at the standard or aquaculture facility level. Verification is expected to include the need to provide suitable evidence by the aquaculture facility (e.g., a summary report written by a credible 3rd party on the source fishery, a self-certification by the appropriate management authority, a 3rd party fishery certification that verifies suitable compliance).
A documented management approach is expected to follow

Component D.3.01 where the standard requires the existence of documented management approaches or other management framework covering the unit of certification and the stock under consideration, including management measures consistent with achieving management objectives for the stock under consideration. Expected outcomes of the management approach are described in the Guidance of D.6.01 Target Stock Status, D.6.05 Non-Target Catches, D.6.06 Endangered Species, and D.6.07 Habitat, respectively. Definitions of terms related to wild fisheries can be found in Section D terms of the Glossary.

Examples of environmentally damaging collection practices include blast, poison, and Muro-ami fishing practices.

- **ASC**

Without traceability/CoC it is impossible to verify origin, and thus y/n on meeting the requirement. The component is too high level to be properly implemented.

- **GSSI response**

Based on ASC’s comment the Component and Guidance text has been changed.

Components C.6.03 and C.6.04 will be combined.

The Component text was not considered to be excessively stringent by the EWG. The Component and Guidance text will consequently remain unchanged following comments. There will be a general statement included in the BM Tool to state that for all the Components in section C, it is assumed that a coherent and credible chain of custody (CoC) can be implied.

GSSI Essential Component C.6.03 (former: C.6.03 and C.6.04)

Component text: The standard requires that the aquaculture facility intentionally stocks hatchery-raised seed unless justification exists otherwise. In cases where such justification exists, the standard requires that where there is deliberate use of wild seed 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 that of the wider ecosystem. This requires a documented management approach that ensures those wild populations are not overfished and not subject to recruitment overfishing or other impacts that are likely to be irreversible or very slowly reversible, and avoids, minimizes or mitigates fishing impacts on essential habitats and on habitats that are highly vulnerable to damage by the fishing gear;
- Avoids the use of environmentally damaging collection practices;
- And ensures that the source fishery is regulated by an appropriate authority

Guidance text: Standards are expected to encourage the use of hatchery raised seed as they become available (e.g. by including a deadline for use to become required in the standard, or a certain percentage of seed needing to come from hatcheries to be met for certification, etc.). Verification is expected to include a review of evidence of the source of seed stocked at the aquaculture facility. In case of production systems and species where only hatchery seed is used (e.g. Atlantic salmon) this GSSI Essential Component can be not applicable.

Expected examples of "justifiable use" include where there is a lack of commercially-available hatchery-raised seed, inability/lack of technology to hatchery-raised the farmed species, or passive collection of molluscs. Justification could be offered at the standard or aquaculture facility level. Verification is expected to include the need to provide suitable evidence by the aquaculture facility (e.g., a summary report written by a credible 3rd party on the source fishery, a self-certification by the appropriate management authority, a 3rd party fishery certification that verifies suitable compliance).
A documented management approach is expected to follow

Component D.3.01 where the standard requires the existence of documented management approaches or other management framework covering the unit of certification and the stock under consideration, including management measures consistent with achieving management objectives for the stock under consideration. Expected outcomes of the management approach are described in the Guidance of D.6.01 Target Stock Status, D.6.05 Non-Target Catches, D.6.06 Endangered Species, and D.6.07 Habitat, respectively. Definitions of terms related to wild fisheries can be found in Section D terms of the Glossary.

Examples of environmentally damaging collection practices include blast, poison, and Muro-ami fishing practices.

REFERENCES

Paragraph 48 of the Technical Guidelines of Aquaculture Certification.

ESSENTIAL COMPONENT C.6.04

Component text

The standard requires that the aquaculture facility intentionally stocks hatchery-raised seed unless justification exists otherwise.

Guidance text

Examples of suitable justifiable exclusions are provided in C.6.03. Standards are expected to encourage the use of hatchery raised seed as they become available (e.g. by including a deadline for use to become required in the standard, or a certain percentage of seed needing to come from hatcheries to be met for certification, etc.). Verification is expected to include a review of evidence of the source of seed stocked at the aquaculture facility. In case of production systems and species where only hatchery seed is used (e.g. Atlantic salmon) this GSSI Essential Component can be not applicable.

- **ASC**

Component clashes with C.6.03

- **GSSI response**

Based on ASC's comment, the Component and Guidance has been changed.

Component C.6.04 will be combined with C.6.03 in order to fulfil the revision's remit to reduce the complexity of the Benchmark Framework.

The new component text for C.6.04 is given above in the combined C.6.03 component. Supplementary components C.6.03.01 and C.6.03.02 will remain numbered as before, but now under the new combined C.6.03 component. All the C.6.05 components will become C.6.04 – e.g. C.6.05.01/.02/.03 become C.6.04.01/.02/.03 etc

GSSI Essential Component C.6.04

Component text: ~~The standard requires that the aquaculture facility intentionally stocks hatchery-raised seed unless justification exists otherwise.~~

This component will be combined with C.6.03

Guidance text: ~~Examples of suitable justifiable exclusions are provided in C.6.03. Standards are expected to encourage the use of hatchery raised seed as they become available (e.g. by including a deadline for use to become required in the standard, or a certain percentage of seed needing to come from hatcheries to be met for certification, etc.). Verification is expected to include a review of evidence of the source of seed stocked at the aquaculture facility. In case of production systems and species where only hatchery seed is used (e.g. Atlantic salmon) this GSSI Essential Component can be not applicable.~~

This component will be combined with C.6.03

REFERENCES

Paragraph 48 of the Technical Guidelines of Aquaculture Certification.

ESSENTIAL COMPONENT C.8.02

Component text

The standard requires that the aquaculture facility establishes, implements, and maintains an appropriate system that addresses the impact of salinization of freshwater resources and the surrounding environment by the aquaculture facility.

Guidance text

An exemption for standards that do not cover land-based saline water systems is expected.

Appropriate measures are expected to be based on risk assessments or standardized requirements. Controls could include relevant monitoring of freshwater resources (e.g., groundwater resources, local water bodies, local soils) for salinity changes and measures such as pond-linings, limiting groundwater use and other control techniques. The standard is expected to prohibit the aquaculture facility to contributing to changing freshwater resources and the surrounding environment to saline conditions. Verification is expected to include a review of evidence that the system is operational and fit for purpose, such as a visual inspection of the site.

- **ASC**

Component needs to be more explicit. The guidance is more strict than the Component, which cannot be.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

In respect of this comment, no change will be made to the Component or Guidance text. The Guidance cannot change the leading Component text. A request was shared with ASC to propose a text that would address their concerns, but no response was received.

GSSI Essential Component C.8.02

Component text: The standard requires that the aquaculture facility establishes, implements, and maintains an appropriate system that addresses the impact of salinization of freshwater resources and the surrounding environment by the aquaculture facility.

Guidance text: An exemption for standards that do not cover land-based saline water systems is expected.

Appropriate measures are expected to be based on risk assessments or standardized requirements. Controls could include relevant monitoring of freshwater resources (e.g., groundwater resources, local water bodies, local soils) for salinity changes and measures such as pond-linings, limiting groundwater use and other control techniques. The standard is expected to prohibit the aquaculture facility to contributing to changing freshwater resources and the surrounding environment to saline conditions. Verification is expected to include a review of evidence that the system is operational and fit for purpose, such as a visual inspection of the site.

REFERENCES

Paragraph 47 of the Technical Guidelines on Aquaculture Certification.

ESSENTIAL COMPONENT C.8.03

Component text

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**

Component is too high-level. It needs more specificity.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

The Component text must be sufficiently broad to encompass all potential eventualities whilst retaining adequate rigour regarding the underlying objective, i.e. efficient water use.

GSSI Essential Component C.8.03

Component text: 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.

Guidance text: 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.

REFERENCES

Paragraph 47 of the Technical Guidelines on Aquaculture Certification.

ESSENTIAL COMPONENT C.9.01

Component text

The standard requires (evidence of) compliance with all local and national laws and regulations relevant to aquaculture, especially concerning

- Application of chemicals and veterinary drugs
- Feed, feed ingredients and fertilizers
- Habitat and biodiversity (including Environmental Impact Assessment (EIA) where required)
- Seed sourcing at both source and destination
- Escapes and releases
- Water use, water quality and waste discharge

- **ASC**

A number of the listed topics are beyond the range from a farm standard but relate to practices that occur at feed mill or seed/hatchery level. This cannot be part of a Farm Standard scope.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

This new Component replaces a series of Essential Components that duplicate the requirement to obey national and local laws. All were linked by a critical requirement: to obey the law. This merging of related Components was proposed to streamline the Benchmark Tool, this being one of the objectives of the revision process.

The onus here is clearly upon the farmer/producer to procure the legally correct input, not upon the input supplier who is not directly covered by this Component.

GSSI Essential Component C.9.01

Component text: The standard requires (evidence of) compliance with all local and national laws and regulations relevant to aquaculture, especially concerning

- Application of chemicals and veterinary drugs
- Feed, feed ingredients and fertilizers
- Habitat and biodiversity (including Environmental Impact Assessment (EIA) where required)
- Seed sourcing at both source and destination
- Escapes and releases
- Water use, water quality and waste discharge

Guidance text: Verification is expected to include a review of evidence provided by the aquaculture facility to support compliance with relevant laws. For feed, its ingredients & fertilizers, verification is expected to include a review of evidence (e.g., documentation, self-declaration by the feed manufacturer).
For seed sourcing this could include international laws (e.g., CITES, OIE and ICES import guidelines) and laws governing introductions and transfers of live aquatic animals.

REFERENCES

Paragraphs 17a, 17b, and 37 of the Technical Guidelines on Aquaculture Certification.

Other comments

OIE AAHC REFERENCING

- **GSSI response**

Where OIE is referenced, a statement will be included to refer to the OIE AAHC as being *"updated to the most recent version, adjusted as necessary to ensure that like-for-like clause references are maintained (so that numbering changes do not undermine the BM Tools intentions)".*

DRIFT OF SCOPE

- **ASC**

It is understood that GSSI focusses on environmental impacts and that, with regards to Part C of the GSSI Benchmark Tool, the FAO Technical Guidelines on Aquaculture Certification

serve as the backbone for the framework. It is also understood that within the aquaculture supply chain, 'Part C' defines requirements relevant to schemes that address producers (i.e. "the farm").

Within the context of the above, ASC wishes to raise concern over "scope drift" within the GSSI Benchmark Tool at two levels:

1) Several of the (Essential) Components refer in their Reference to the paragraphs within the Food Safety section of the FAO Technical Guidelines on Aquaculture Certification. As the scope of the GSSI Benchmark is environmental, concerns are raised over their relevance within the GSSI Benchmark Tool;

2) Several of the Components (both Essential and Supplementary) do not address requirements related to producers, but are related to other actors in the supply chain. (e.g. veterinarians, feed mills, broodstock/hatchery facilities). As [certification] schemes assess criteria at farm level through audits, requiring that schemes provide sufficient assurance beyond farm-orientated Components is not realistic. It is recommended to remain absolutely consistent on the original scope within the Benchmark Tool.

- **GSSI response**

Based on the Public Consultation comments, a change has been made.

In a separate section, providing generic instruction to the Benchmark Framework, a statement will be included to clarify that the onus is upon the certified farmer/producer and not on the supplier, re any requirement (e.g. sustainably sources feed, seed etc.).

The included statement will go as follows: *"For the avoidance of doubt, this component applies to the producer (eg fish farmer) who is being evaluated for certification, not the suppliers to that producer. The onus is upon the producer themselves to source from an appropriate supplier"*

OBJECTIVITY AND TRANSPARENCY ON SELECTION ESSENTIAL AND SUPPLEMENTARY COMPONENTS

- **ASC**

The design of the Benchmark Tool does not make obvious nor transparent how the environmental related paragraphs (19-26, 37-52) in the FAO Technical Guidelines on Aquaculture Certification, are translated into Components. A structure in which the paragraphs are listed first, followed by (per paragraph) a sub-list of defined Components would enable the reader to understand how GSSI assures that the relevant FAO (environmental) paragraphs are truly translated into scheme requirements.

2) Where the FAO Technical Guidelines on Aquaculture Certification refer to the OIE Standards, a subset of clauses from the OIE Aquatic Animal Health Code are referenced within the GSSI Benchmark Tool. The selection process for these clauses:
a. Is not explained.
b. Has resulted in inclusion of clauses that address responsibilities of veterinary professionals (instead of only focusing on responsibilities of producers – reiterating the concern on scope drift).
c. Are not perceived to select all needed/relevant OIE Standards.
d. Interpret OIE Standards incorrectly.
e. Resulted in the use of/reference to an outdated version of the OIE Animal Health Code (2015 vs. 2019).

3) Several Supplementary Components define market claims or are (loosely) referenced to technical documents and/or scientific article(s). A systematic approach in defining these Supplementary Components seems to be lacking. This leaves certification schemes applying for recognition with a

feeling of “cherry-picking” and this raises questions over the need for -- and validity of -- Supplementary Components since only the Essential Components are relevant for achieving GSSI recognition.

A limited set of Supplementary Components vastly underestimates the complexity of what is being ‘asked’ for alignment. The Supplementary Component C.4.04.03 exemplifies this well: “The standard requires independent verification that the feed manufacturer only sources terrestrial feed ingredients (where greater than 1% of content) that are certified to an ecolabel or risk assessed not to present significant environmental impacts.” The realities required to achieve ‘alignment’ to this specific Component are beyond a single, high-level, requirement and range from challenges in traceability of terrestrial feed ingredients back to production-level, defining criteria that need to be assessed in the risk assessment, when an impact is considered significant, and when not, etc. In addition, scope drift (see Concern 1) creeps in as this particular Component focusses at the feed mill practices, and not at farm-level practices. Although Components such as this one are indicated as “Supplementary”, ‘achievement of’/’alignment to’ some of them can be utterly unrealistic/improbable – and if assessed as such can/could lead to questions being raised regarding the credibility of the scheme, and by extension to that of the GSSI benchmarking process.

5) The determination why some Supplementary Component B.2.09.02 is deemed by GSSI not to be applicable to Aquaculture (applicable to Wild Fisheries only), goes against GSSI’s declared intention towards ‘transparency’ and recognition of ‘stakeholder inputs’. In line with the above, there is no credible rationale provided by GSSI (unless transparency and stakeholder input are deemed ‘not relevant’) for not seeking to make a draft of the full audit report publicly available prior to the certification decision and making this Supplementary Component applicable to Aquaculture.

Starting with a proper and FAO-aligned definition of what a ‘Standard’ is [See our comment to Essential Component A.3.13], it is recommended that explicit and systematic rationales must be provided by GSSI – traceable and logically referenced to FAO Guidelines and/or OIE Standards - as to ‘how’ and ‘why’ Essential or Supplementary Components have been devised; and conversely also ‘why’ some areas relevant to FAO Guidelines/OIE Aquatic Animal Health Code/Standards have not been deemed relevant for the scope of the GSSI Benchmarking Tool.

ASC is of the view that not discriminating Aquaculture vs. Fisheries [e.g. by making the transparency-focused Supplementary Component B.2.09.02 applicable to Aquaculture certification schemes] is paramount to GSSI delivering on its Mission to “Ensure confidence in the supply and promotion of certified seafood as well as to promote improvement in the seafood certification schemes.”

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

Selection of Essential and Supplementary Components were determined during a comprehensive process of the Benchmark Framework drafting (2014-2015) and revision (2019-2020). International reference documents, FAO Code of Conduct on Responsible Fisheries, FAO Technical Guidelines, OIE guidelines etc, are referenced in the Benchmark Framework on a component level, demonstrating the base of each component. Furthermore, whether a component can be deemed “Not Applicable” is also mentioned on a component level.

No specific examples were given by ASC of incorrect interpretation of international reference documents and these could therefore not be considered by the EWG.

AMBIGUITY IN LANGUAGE

- **ASC**

The language/wording used in the text of Components and their Guidance can recurrently come across as wanting, ambiguous, and/or potentially leading to comparatively (between schemes assessed) various (‘more, or less’ strict) interpretations/assessments… and resulting ‘alignments’. Examples include:

I. Verbal forms as “should”, “could”, “expects”, “may” mean -- in normative language -- “nothing”, as no requirement (a “must”, or “shall”) is being defined; and any such perceived requirement can thus be circumvented, or be ambivalently interpreted.

II. Many Guidance sections include requirements that are not reflected (directly/indirectly) in the actual Component. This is not what Guidance is meant for. Suggest to re-write Essential Components to include all needed “musts”, and that Guidance only elaborates on Guidance on the given normative requirements.

III. Many Guidance sections refer to what is expected to be assessed during audits (i.e. audit processes, expected evidence, etc.). This is completely beyond the scope of Part C (Standard content) and can not be part of Guidance related to Components.

Given the ambiguity oft nested in the Guidance column, the overall need to focus on such content is being raised by ASC for this part of the Benchmark Tool. Arguably, with 1) a clearer structure of the Benchmark Tool, and 2) clearer, or more explicit, Component language, the overall need for Guidance can be considered redundant. Further to ASC’s feedback to review of Parts A, B, and C of the draft GSSI Benchmark Tool v2.0, the following concerns are also raised regarding the GSSI Benchmark Process.

- **GSSI response**

Based on the Public Consultation comments, changes have been made to the Benchmark Framework.

Consistency and clarity of language was an important focus point for the Benchmark Framework revision. In the changes made in the Framework, across all sections, it is shown that EWGs have implemented language changes to address consistency and clarity of language in Component and Guidance text.

Adjustments in the structure of the Benchmark Framework have been made, most specifically implementing a two-tier structure for both Section C and D, as well as minor restructuring of the Performance Areas.

AMBIGUITY IN LANGUAGE LEADS TO AMBIGUITIES IN BENCHMARK PROCESS & INCONSISTENCIES IN GSSI BENCHMARKING TOOL’S ASSESSMENTS

- **ASC**

Furthermore, and regarding the assessment process per se, a tentative and comparative examination of the GSSI’s Benchmarking Tool’s recognised aquaculture schemes reports can highlight many inconsistencies in interpretations and assessments (including re. what is deemed ‘in scope’ or ‘N/A’) by independent experts (IEs).

For example (and not limited to), different benchmarking reports yield numerous varying (or not) assessments in what could be construed as being similar (or not) assessments regarding:

- Which components are deemed applicable, or not’.
- Scope of recognition (some Certification Scheme’s standards are being ‘GSSI recognised’ without some of the Scheme’s standards having been benchmarked).
- Lack of consistency in providing evidence for alignment to certain Supplementary Components.
- Variability in definitions of GSSI alignment-requirements, leading to variability in assessments by IEs.
- Discrepancies in identifying which Supplementary Components can be linked to ISEAL, or not.
- It is not always evident if an editing/presentation error is responsible for a differing assessment between certification schemes, or if it is vice-versa?
- Etc.

ASC believes and recommends that addressing Concerns 1-3 above & Concern 5 below would significantly address such GSSI Benchmarking Process/Tool inconsistencies.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

GSSI-recognition is provided for the Scheme Owner and its standard within the scope of recognition. This scope of recognition only includes the successfully benchmarked standards of the Scheme Owner. This can include multiple standards, or the minimum of one standard. On the "GSSI recognized certification" page on the GSSI website, listing GSSI-recognized Scheme Owners, it is clarified which standard(s) is included in the scope of recognition, showing at least one for each Scheme Owner.

No further examples demonstrating ambiguity were mentioned. The EWG has reviewed the comments but not find components where a change was warranted.

GSSI GOVERNANCE, TRANSPARENCY, IMPARTIALITY, CONFLICT OF INTEREST & CREDIBILITY

- **ASC**

According to GSSI Charter's Rules of Governance, the composition of the Steering Board is such that [3.11.b] "The key stakeholders that are eligible to be a member of the Steering Board do not include the seafood certification, ABs and CBs, schemes due to their vested interests."

In parallel and however, GSSI duly acknowledges in its Charter v3.0 that conflicts of interest can occur for GSSI members of its governing bodies, including its Steering Board, who may entertain relationships (including "financial dependencies" - 3.7.b) with, for instance "1. Seafood certification scheme owner; 2. Accreditation bodies; 3. Certification bodies; 4. Private companies involved in seafood certification, such as, service providers".
Section 3.7 of the Charter - 'GSSI Conflict of Interest Policy' states [3.7 a…] "Conflict of interests may arise for members of the Steering Board, Committees, Expert Working Groups, GSSI Partners, the Secretariat, Independent Experts and external consultants".

Furthermore, most/many of the 'key stakeholders' eligible for Steering Board membership, as defined in GSSI Charter 3.11.a, include representative members/companies themselves seeking certification from the very seafood certification schemes which they have tasked themselves to benchmark 'objectively'.

In discriminating, but not defining, the difference between such GSSI members' "conflicts of interests" and the "vested interests" of fisheries/aquaculture certification schemes; ABs and CBs when they clearly overlap, GSSI's exposes itself to claims of partiality, lack of independence and transparency, and thus lack of credibility.

Whilst GSSI states (3.8.a) that "every possible conflicting interest is to be fully declared. The concern must be the welfare and credibility of GSSI." These are however not transparently/publicly disclosed, only declared 'internally'. Section 3.8.f of the GSSI Charter indeed states "[…] The conflict of interest disclosure statements of partners and service providers are not made public but would be made available upon justified request."

In the absence of the very knowledge that a conflict of interest is possibly taking place –particularly regarding the authorship of the GSSI Benchmark Reports - it is near impossible for a trusting and unsuspecting stakeholder/member of the public not privy of that knowledge to make such a "justified request".

GSSI describes its 7-step Benchmark Tool Process as "designed to be independent, impartial and transparent" and claims to be making "objective assessments". However, the lack of transparency

regarding the GSSI Benchmark Reports' authors' potential conflicts of interests clearly counters such objective and potentially affect the credibility of the GSSI Benchmarking Tool and the recognitions based on it.

In line with the intent declared in its own Charter ("This Charter is used to ensure consistency in governance, transparency of process, and commitment and integrity of GSSI Participants" – page 1), ASC would strongly recommend for the purpose of GSSI's objectivity, transparency, impartiality and credibility, that GSSI proactively disclose/publish any/all Conflict of Interest of the "independent experts" [IEs] and Steering Board members involved in the authorship/review of the GSSI Benchmark Reports, within the pages of the said reports.

- **GSSI response**

Based on the Public Consultation comments, no change has been made.

All individuals involved in the Benchmark Process are mentioned in the first pages of the Benchmark Report, as well as on the GSSI website. This information is public from the start of the (first) Public Consultation on the (interim) Benchmark Report. The public information includes the full name, employer and previous work experience of the individuals. Each individual is annually assessed to comply with GSSI's Conflict of Interest Policy.

The GSSI Charter is not the subject of the Public Consultation and the comments concerning the GSSI's Charter and/or Conflict of Interest Policy can therefore not be considered by the EWGs.

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,

Eva van Heukelom
Technical Manager