

Haarlem, 8th of October 2021

Moritz Konz

Programme Manager
Global Nature Fund
Fritz-Reichle-Ring 4
78315 Radolfzell, Germany

Dear Moritz,

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 **Global Nature Fund and Naturland** 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 C – Aquaculture

ESSENTIAL COMPONENT C.1.05

Component text

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

■ **Naturland/GNF**

Infrastructural issues: small scale farmers that produce extensively, they often are not close to (C1.05) infrastructure. Biosecurity, disease spreading, when you look at ecosystems we see that some biosecurity measures are not suitable for these areas.

■ **GSSI response**

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

The wording in the Component provides flexibility that allows it to apply to a wide range of culture systems through use of language such as “*appropriate procedures*” and concerning quarantine “*where feasible*”. This applies to small-scale highly extensive culture systems.

GSSI Essential Component C.1.05

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

Guidance text: It is expected that disease response procedures would be a component of the aquatic animal health management system. Feasibility of quarantine depends on a combination of species, culture system and production environment. In cases where quarantine is applicable, a review of suitable evidence is expected to demonstrate and verify the ability to contain diseased aquatic animals.

REFERENCES

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

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.

▪ Naturland/GNF

Regarding issues like escapes, documentation, the question raised if this is practical in shrimp culture, because it is hard to estimate how much shrimp is in there. Even with good documentation of stocking, you don't have physical evidence. Also, there might be floods. We [*shrimp farming & mangrove recovery project in Bangladesh and India*] only use regional species; we focus on local black tiger shrimp. Is the documentation of a local species really necessary? It is deliberately not vannamei because it is an alien species. With the flooding, a lot of wild post larvae from shrimps and will be harvested as well. For instance, in Vietnam, this is something from wild larvae they are even counting at. We couldn't detect how this is even reflected. Conjunction between stock, wild stocking, since the farming operations are in an open system, so pond directly included in the nature. We aim for integrated mangrove planting, supporting the biodiversity.

▪ GSSI response

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

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

GSSI Essential Component C.6.03

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.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

■ **Naturland/GNF**

Some aspects were coming short with this new clustered component, also referring to alien species part. Licensing of a farm can be better defined. There are locally so many different laws on what a farm should have. This licensing is also an issue we might run into in India and Bangladesh, because a lot of farm

scale farmers are not licensed. They are kept completely under the radar. We want to make operational licensing possible, but keeping mind, to not keep farmers disadvantages. We need to see they are legally operating and getting recognition, and also getting the benefits of being recorded (getting supporting money from initiatives) could be more precise in C9.01.

■ **GSSI response**

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

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

The Benchmark Tool cannot endorse any behaviour that diverts from complying with legal requirements. Additionally, it is found that the issue addressed could be prevented through other means.

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.

Many thanks again for participating in the Public Consultation and we 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