

Haarlem, 20th of October 2021

John Hargreaves

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Dear John,

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 Assessments LLC** 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.4.05

Component text

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

■ John Hargreaves

I was particularly gratified to see C.4.05 addressed as this was particularly problematic during benchmarking of the standards for which I served as IE. The revised guidance section does a good job at providing clarification through definition of “whole fish” and the conditions for which a finding of “not applicable” is appropriate. I might suggest an editorial change to the first sentence of the guidance. Rather than beginning the sentence with “0%...” I suggest changing to say “No part...” (Grammatically it is unacceptable to begin a sentence with a number.) This is a small change.

■ GSSI response

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

The term “whole fish” will be changed to “raw fish” in the Component text. This is to provide more clarity on the intent of the Component.

GSSI Essential Component C.4.05

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

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

Guidance text: 0% of feed at any time during production (under the scope of certification) may contain “whole fish” or “wet fish”, which includes any form of uncooked wet fish (whole or chopped or frozen etc.), which includes direct feed, supplemental feeding, or on-farm made applications. Alternatives would be to require 100% use of commercial dry pelleted feeds.

Verification is expected to include a suitable review of evidence, such as feed use records, visual observation, and financial records in aquaculture industries where this is common practice.

A non-applicable (N/A) designation is only acceptable where 100% of production under the scope of the standard (including species, production intensity and production systems covered) uses entirely commercial dry pelleted feeds (e.g., Atlantic salmon).

REFERENCES

Paragraph 52 of the Technical Guidelines on Aquaculture Certification
FAO (2011) Aquaculture Development. 5. Use of Wild Fish as Feed in Aquaculture Principle 7

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.

▪ **John Hargreaves**

I take issue with the revised text of the component, specifically the sentence that reads: “Where acceptable levels of impact are exceeded, there should be provision for sanctions.” I encourage GSSI to exclude this statement to be consistent with the language and intent of all other Essential and Supplemental Components. If the statement about exceeding limits is included in this Essential Component, similar text about exceeding limits should be included for each Essential and Supplemental Component for consistency. Why are limits to benthic impacts singled out as requiring specification of sanctions? For example, some critics believe sanctions should be applied to farms that exceed thresholds for escapes. Why isn’t that included in the GSSI Benchmarking Tool. It is a slippery slope and I do not think GSSI should go down this path. Furthermore, there is nothing in the FAO Technical Guidelines for Aquaculture Certification that requires sanctions for exceeding limits on benthic impacts. Finally, the core issue here is non-compliance with a particular audit clause in a scheme. Typically these are defined by scheme owners in operational guidelines. GSSI, in Part B – Operational Management, has an Essential Component (B.2.10) that directly addresses non-compliance. This should be sufficient as it applies to all technical components (audit clauses) of a scheme. The proposed new text referring to sanctions in the component and in guidance in blue should be deleted.

▪ **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.

The intent of this Component is to be communicated to EWG A&B and the Steering Board to ensure that the issue of the application of sanctions is adequately covered within either the governance (A) or scheme management (B) sections of the BM 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.

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.

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.8.04

Component text

The standard requires, where appropriate, management measures for effluents in order to reduce adverse impacts on the water quality of water bodies receiving effluents. Monitoring of the systems effluents against appropriate criteria is required, with sanctions applied where mitigation response is inadequate.

▪ **John Hargreaves**

My comments are essentially the same as provided for C.5.01. The text about requiring standards to have sanctions in place should be deleted. Again, the FAO Technical Guidelines on Aquaculture certification makes no reference to a requirement for sanctions with respect to exceeding effluent limits.

▪ **GSSI response**

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

The mention of sanctions has been removed from the Component text, similar to Component C5.01. For reasons stated above in connection with Component C5.01 reference to sanctions should be removed. This was agreed by the EWG for C.5.01 and so must similarly be applied here.

GSSI Essential Component C.8.04

Component text: The standard requires, where appropriate, management measures for effluents in order to reduce adverse impacts on the water quality of water bodies receiving effluents. Monitoring of the systems effluents against appropriate criteria is required, with sanctions applied where mitigation response is inadequate.

The standard requires, where appropriate, management measures for effluents in order to reduce adverse impacts on the water quality of water bodies receiving effluents. Monitoring of the systems effluents against appropriate criteria is required.

Guidance text: Appropriate measures are expected to include.

1. Monitoring and recording of effluent or receiving water quality, and which may including key parameters that need to be addressed include, where applicable:

- i) Nutrients – Nitrate/Nitrogen (impacts on seawater)
- ii) Nutrients – Phosphate/Phosphorous (impacts on freshwater)
- iii) Dissolved oxygen
- iv) Salinity
- v) Suspended Solids
- vi) pH

2. Defined, aquaculture appropriate, maximum reference points (e.g., general concentration limits or aquaculture facility-specific limits) or mandatory systems (e.g., presence of a suitable filter) are defined to prevent pollution

3. Where reference points are exceeded, the scheme either refuses certification or that mitigation methods are employed and monitored to meet a time bound goal to come into compliance.

Verification is expected to include a review of evidence that the system is operational and fit for purpose, including visual inspection of the site. Where effluent concentration limits are used for compliance, independent verification of conformance is also expected.

“Where appropriate” is expected to include standards that cover production systems that release effluent that has the potential to impact water quality, e.g., fed/intensive aquaculture in ponds and raceways. An exception for marine cage aquaculture and on or off bottom shellfish culture is expected.

REFERENCES

Paragraph 47 of the Technical Guidelines on Aquaculture Certification.

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