

Haarlem, 8th of November 2021

Hisanori Kanno
Secretary General
Marine Eco-Label Japan
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Dear Hisanori Kanno,

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 **Marine Eco-Label Japan** 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.

■ MEL Japan

MEL Council would like to ask the reason why Supplementary Components are integrated/ incorporated/merged in Essential Components, such as A.1.01.02, A.3.06.01, and, A.3.15.01-02 which rationale said “Elevated all stakeholder participation related items to essential”. MEL Council would think, even the change seems reasonable, but still, when the supplementary elevated to essential, the reasons should be clearly stated.

■ GSSI response

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

Merging of components will help efficiency and clarity of the Tool, in line with the objective of this revision.

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.~~

[Deleted, incorporated in A.3.23](#)

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.3.06.01

Component text

Deleted, included in A.3.01

▪ **MEL Japan**

MEL Council would like to ask the reason why Supplementary Components are integrated/incorporated/merged in Essential Components, such as A.1.01.02, A.3.06.01, and, A.3.15.01-02 which rationale said “Elevated all stakeholder participation related items to essential”. MEL Council would think, even the change seems reasonable, but still, when the supplementary elevated to essential, the reasons should be clearly stated.

▪ **GSSI response**

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

Merging of components will help efficiency and clarity of the Tool, in line with the objective of this revision.

GSSI Supplementary Component A.3.06.01

Component text: Delete, included in A.3.01

Guidance text: Delete, included in A.3.01

ESSENTIAL COMPONENT A.3.15

Component text

The Scheme Owner identifies all stakeholders and ensures proactively that all can participate in the standard-setting process through a consultation forum or are made aware of alternative mechanisms by which they can participate.

This includes stakeholders that are not well represented in consultations and disadvantaged stakeholders (small-scale operations and vulnerable groups).

Guidance text

The Scheme Owner has a mechanism in place to identify all affected stakeholders. It makes sure that, when needed, alternative tools are in place to leverage potential barriers to participate.

Examples of evidence for scheme alignment:

- Stakeholder mapping including past participation
- Internal procedure/quality handbook defining public consultation process.
- ToR. Review participation, communication and mechanisms/tools of past or current consultation.
- Meeting minutes, announcements, publications and or email communication indicate that the Scheme Owner is proactively seeking the input of specific stakeholder groups.

▪ **MEL Japan**

MEL Council would like to ask the reason why Supplementary Components are integrated/incorporated/merged in Essential Components, such as A.1.01.02, A.3.06.01, and, A.3.15.01-02 which rationale said “Elevated all stakeholder participation related items to essential”.

MEL Council would think, even the change seems reasonable, but still, when the supplementary elevated to essential, the reasons should be clearly stated.

▪ **GSSI response**

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

The Scheme Owners need to identify only the impacted stakeholders. The elevation from supplementary to essential is made for simplification reasons.

GSSI Essential Component A.3.15

Component text: The Scheme Owner identifies **all impacted stakeholders** and ensures proactively that all can participate in the standard-setting process through a consultation forum or are made aware of alternative mechanisms by which they can participate. This includes stakeholders that are not well represented in consultations and disadvantaged stakeholders (small-scale operations and vulnerable groups).

Guidance text: The Scheme Owner has a mechanism in place to identify **all impacted stakeholders**. It makes sure that, when needed, alternative tools are in place to leverage potential barriers to participate.

Examples of evidence for scheme alignment:

- Stakeholder mapping including past participation
- Internal procedure/quality handbook defining public consultation process.
- ToR. Review participation, communication and mechanisms/tools of past or current consultation.
- Meeting minutes, announcements, publications and or email communication indicate that the Scheme Owner is proactively seeking the input of specific stakeholder groups.

REFERENCES

FAO 55 [77]

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.

■ MEL Japan

In the excel above, Rationale for the change on A.3.25 is as follows; Component and Guidance: replaced at least by at most to align on international practice (ISO or private standards). MEL Council would like to ask why? Because, to us, it is strange to set “at most” three years while FAO guidelines stipulate at least three years for fisheries. Also, even stranger GSSI proposed change on aquaculture set “at most one year” while FAO guideline does not even mention specific length as “one year” at all, but with moderate expression as “an appropriate period” only. If “one year” for aquaculture was GSSI’s interpretation of appropriate period, then “at least one year” to set up the minimum period makes sense.

However, GSSI's revised Component as "at most one year" cannot be a proper interpretation of FAO guideline anymore, then too short thus too hard to come into compliance within a year for aquaculture. MEL Council would think it might be a mistake, but if not, MEL Council suggests the proposed changes by "at most" are inappropriate and therefore, require to remain "at least" as they were.

▪ **GSSI response**

Based on MEL'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 – **minimum 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 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.

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).

▪ MEL Japan

The paragraph 52 of FAO guideline indicated the responsible use of feeds in order “to minimize their adverse impacts on the environment and to promote economic viability”. Also, Principle 7 and its detailed explanation of FAO Aquaculture Development indicates to “ecolodge” to transfer “from using wet fish as feed to formulated/compound feeds”. In addition, “this issue should be treated on a case-by-case basis using cost-benefit analyses that incorporate environmental and social parameters, where possible”.

On the other hand, GSSI proposed guidance states as follows:

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.

This GSSI’s proposed guidance restricts “100% use of commercial dry pelleted feeds” without taking account of sustainable aquaculture from socio-economic perspectives. It is obviously contradicting with FAO guidelines. MEL Council recognizes the need to use 100% commercial dry pelleted feeds ultimately. Once conditions are met to guarantee the sustainable aquaculture from both environmental and socioeconomic perspective, MEL Council will consider adding such criteria to MEL Aquaculture Management Standard (AMS). On the other hand, aquaculture farmers, especially small-scale farmers, in Asian countries including Japan currently use moist pellets (MP) to certain aquaculture species (Seriola and blue fin tuna). MEL AMS includes an exception for use of MP during limited periods when water temperature is below 20°C to maintain fish health, and thus animal welfare is concern. Also, MP is used to maintain product’s quality (market price). In case the use of MP is prohibited as GSSI proposed, it will cause the degradation of fish health and quality, then aquaculture in Asian countries will not be able to stand as an industry anymore. In addition, making MP does not require drying process and it contributes to the prevention of global warming (increase of energy efficiency). For those reasons, MEL AMS accepts the use of MP under the proper raw materials and certain periods. Additionally, MEL AMS assures the reduction of environmental impact and the prevention of disease spreading as MP is used. Thus, MEL AMS for the use of MP shall be in alignment with FAO guidelines.

MEL Council recognizes it is the global trend that aquaculture certification shall be open to all responsible aquaculture farmers and its species. Thus, modification of C.4.05 is contradicting to GSSI’s philosophy covering diverse marine eco-labeling schemes in the world. Therefore, MEL Council, representing the promotion of sustainable aquaculture in Asian country, would like to suggest GSSI to reconsider the modification of C.4.05.

▪ GSSI response

Based on MEL Japan’s 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.

The conclusion was that problems with this component were due to the component text, which was clearly confusing and at odds with the intention as understood by the EWG and elaborated in the row revised guidance. Consequently, to provide more clarity on the intent of the component, the phrase "whole fish" will be replaced with "raw fish". Revised guidance as presented for PC already deals with the ramifications of raw fish, i.e. whole, chopped, etc. Therefore no further change to the guidance will be needed.

GSSI Essential Component C.4.05

Component text: 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

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