

ASC Farm Standard Frequently Asked Questions (FAQs)

1 March – 30 April 2022 Public Consultation

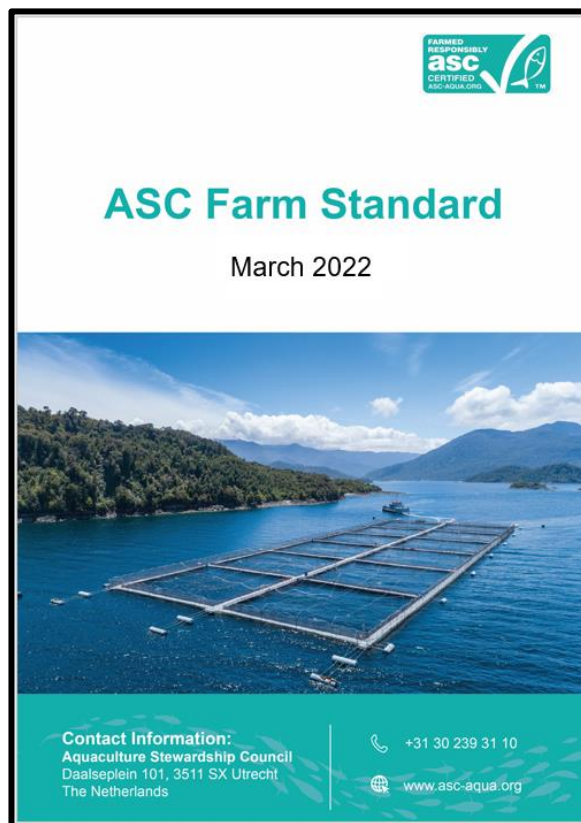


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ASC Farm Standard – General FAQs

1. What is the ASC Farm Standard?

The ASC Farm Standard aims to provide a higher level of consistency and harmonise the applicability, criteria and requirements across all farmed seafood species currently (and in the future) certified by ASC. This will enable a more efficient and consistent approach in future for the addition of new species, and also the process of revising ASC's standards.

Once the ASC Farm Standard is finalised, it will comprehensively and efficiently replace the current 11 species standards (but not the ASC-MSC Seaweed Standard, Chain of Custody Standard and the Feed Standard) into one single standard.

2. Why is ASC aligning its current standards into one ASC Farm Standard?

Having one standard provides a number of benefits to ASC's stakeholders and ASC's mission. Not only does it provide greater consistency and fairness across different species, it also greatly improves the efficiency of the ASC programme and allows ASC to react more quickly to changes in the industry. For example, if ASC wants to make updates to a certain requirement, it currently needs to be done separately for every single standard rather than just once. Moreover, if new species should be added, it is currently a lengthy process as an entire new standard has to be developed. With one Farm Standard, the process can focus just on the specific requirements/impacts of that species. In this way, none of the ASC's rigour is lost, but ASC's processes become more efficient and agile.

3. What is the scope of the ASC Farm Standard?

The ASC Farm Standard will be applicable globally for the main aquaculture production systems. Initial species in scope will be those within the scope of current species standards (Abalone; Bivalve; Flatfish; Freshwater Trout; Pangasius; Salmon; Seabass, Seabream, Meagre; Seriola and Cobia; Shrimp; Tilapia; and Tropical Marine Finfish). Periodic species scope expansion is expected following the completion of the Farm Standard, and this will reflect the programme's strategic priorities. The Farm Standard will apply to farms large and small globally.

Linked to the ASC's mission, the Farm Standard addresses the key negative environmental and social impacts associated with the aquaculture industry from egg to produce. An ASC certified farm contributes to the ASC Vision by reducing, mitigating or eliminating such negative impacts.

4. What does the ASC Farm Standard cover?

In line with the current ASC standards, the ASC Farm Standard encompasses three principles that apply to every Unit of Certification (UoC).

- **Principle 1** - The UoC operates legally and applies effective business management,
- **Principle 2** - The UoC operates in an environmentally responsible manner,
- **Principle 3** - The UoC operates in a socially responsible manner.

Each of these principles contains multiple criteria. The tables below show complete lists of all the criteria in the three principles.

Principle 1 - The UoC operates legally and applies effective business management	
	Criteria
1.1	Legal Compliance
1.2	Management System
1.3	Business Ethics
1.4	Traceability and Transparent Disclosure

Principle 2 - The UoC operates in an environmentally responsible manner	
	Criteria
2.2	Ecologically Important Habitats
2.3	Wildlife Interactions
2.4	Non-Natives
2.5	Escapes
2.6	Benthic Impacts
2.7	Water Quality
2.8	Salinisation
2.9	Biosolids
2.10	Freshwater Use
2.11	Energy Use and Greenhouse Gas Emissions
2.12	Material Use, Waste and Pollution Control
2.13	Feed
2.14	Fish Health and Welfare
2.15	Parasite Control (incl. Sea Lice)
2.16	Antibiotics and other Veterinary Therapeutants
2.17	Hatcheries and Intermediate Sites
2.18	Area Based Management (ABM)

Principle 3 - The UoC operates in a socially responsible manner	
	Criteria
3.1	Rights Awareness
3.2	Forced, Bonded, Compulsory Labour and Human Trafficking
3.3	Child Labour
3.4	Discrimination
3.5	Health and Safety
3.6	Collective Bargaining and Freedom of Association
3.7	Transparent Contracts
3.8	Wages
3.9	Working Hours
3.10	Workplace Conduct Response
3.11	Employee Accommodation
3.12	Grievance Mechanism
3.13	Community Engagement

5. What is the structure of each ASC Farm Standard principle?

Each Principle consists of multiple criteria – each criterion defines an outcome that contributes to achieving the outcome of the principle. Each criterion consists of several indicators – each indicator defines an auditable state that contributes to achieving the criterion outcome.

Several indicators in the ASC Farm Standard require a specific Metric Performance Level (MPL). The applicable MPL is either directly defined in the indicator, or listed in Annex 1 ‘Species Performance Levels’.

Both principles and criteria include rationale statements providing a set of reasons (backed by reference notes if needed) as to why the principle or criterion is needed.

6. Which criteria and their respective indicators are open for consultation between 1 March and 30 April 2022?

All criteria mentioned in question 4 are open for public consultation. Criterion 2.14 in its current form does not include Fish Welfare, which it will include in the final version of the Standard.

7. What is the intended outcome of Principle 1?

Principle 1 requires that certified facilities operate a legal and ethical business in a well-managed manner that assures compliance with the ASC requirements throughout the validity of a certificate.

8. What is the intended outcome of Principle 2?

Aquaculture, like any other food producing system, is reliant on ecosystem services for inputs, and absorption of outputs. If not managed well or overused, the capacity of environment services can be exceeded, resulting in negative environmental impacts. Principle 2 addresses the environmental impacts of aquaculture production.

9. What is the intended outcome of Principle 3?

The aquaculture sector, including its supplying and processing industries, provides food, jobs and income to millions of people globally. The sector is characterised by a high degree of labour-intensive work, especially on farms and processing facilities, with most people employed in economically developing countries.

The intended outcome of Principle 3 is that ASC-certified facilities operate in a socially responsible manner, by ensuring that:

- All genders are treated equally and are given equal opportunities
- Worker rights are respected
- Working and living conditions for workers are decent
- Interactions with neighboring communities and indigenous people are constructive

10. Will Principle 1 also include farm traceability requirements? Will this replace Chain of Custody in case of partial certification?

Yes, see ASC Farm Standard Criterion 1.4 for new “embedded” farm traceability requirements. Partial certification will be limited to the following cases only (defined in CAR v2.3 clause 6.5):

- a. Exceeding antibiotic treatments permitted by the ASC standard authorised by the producing and importing countries as the only resources to safeguard animal health
- b. Critically important antibiotics are used, when permitted by the relevant ASC Standard
- c. Use of Compliant ASC feed is not possible because of commercial limitations
- d. Use of ASC compliant seedlings supplied is not possible because of commercial limitations.

The CAB must evaluate traceability before allowing partial certification in these cases.

11. Do all criteria apply to every Unit of Certification?

The various criteria within each of the principles may apply either to:

- Every Unit of Certification (UoC) (such as the criteria related to legal compliance or labour)
- Only to UoCs that operate a specific production system (such as the criteria related to marine cage culture or pond culture),
- Only to UoCs that produce specific species or are otherwise specifically specified (such as the production of feed, or use of copper nets).

Resulting from this, the Farm Standard can establish multiple scopes at criteria- or indicator-level. A specific scope is defined under each criterion's title. In addition, depending on the site-specific context, individual indicators may become "not applicable". This is assessed by the auditors and captured in the public audit report.

12. How was this proposed draft standard developed?

ASC launched a dedicated review across its current standards to revise existing requirements, identify gaps and align content. The process aims to develop a comprehensive approach that ensures consistent definition and application across all species and culture systems. Technical working groups are convened on select topics to further advise the development of criteria.

Revised rationale, intent and indicators were developed for review and endorsement by ASC's Technical Advisory Group (TAG) prior to public consultation. Further refinement across all criteria, associated guidance, definitions, and species-specific requirements, will be completed following feedback from the public consultation.

The primary goal is to develop a single farm-level standard; the aim is to provide a higher level of consistency and harmonise the applicability, criteria and requirements across all farmed seafood species currently certified by ASC. In doing so there will be expanded requirements for some production systems.

13. What is the timeline for the development of the ASC Farm Standard?

The current consultation runs through March and April 2022. After this the feedback gathered will be processed, which results in a new draft version of the ASC Farm Standard, for which another consultation follows in September 2022, together with pilots. This is the final step for assessing applicability and feasibility of the Standard. If all feedback allows ASC to progress as envisioned the Standard will be launched in Q4 of 2023.

Alignment Process - ASC Farm Standard



*ToR = Terms of Reference

14. How will stakeholders' feedback be used?

All feedback received will be reviewed by ASC's Standards and Science team. Revisions to criteria and indicators will be made where credible evidence supports changes. Additional research will be undertaken as needed and the ASC's Technical Advisory Group, with support from the relevant Technical Working Groups, will provide their endorsement before the final revised proposal is presented for a last public consultation in September 2022.

All feedback from this round of consultation will be published by ASC on the Alignment webpage once compiled after the public consultation period ends. The feedback of the March – May 2021 consultation can be found [here](#).

15. Is ASC introducing new requirements?

In some cases, yes. With the goal of alignment and consistency in mind, requirements may be introduced for some species and culture systems that are absent from current species standards. Further, evaluation of the efficacy and auditability of some requirements has resulted in additional modifications where change will allow ASC to drive further improvements in environmental and social responsibility.

16. Will the ASC Farm Standard still recognise the importance of species and culture system contexts?

Yes. A species-specific annex details the specific metrics to be achieved based on species produced and culture systems.

17. Will the ASC Farm Standard include requirements for Recirculating Aquaculture Systems (RAS)? How will they be included?

Yes, these will be included. The ASC Farm Standard will make it clear where requirements apply specifically to certain production systems, such as RAS. Where nothing is specified, requirements are applicable to all production systems.

18. Could further species be added to the Farm Standard in future?

As is currently the case, new species can be added to the ASC programme if there is a demand for this and an opportunity to reduce environmental and social impacts. The difference is this process will in future be more efficient, without losing any of the rigour that currently makes ASC the leading aquaculture certification programme in the world. On the ASC website all stakeholders can request for a new species to be added: [Request a new species](#).

19. My farm is already ASC certified. What does this mean for my operations?

Certified ASC farms will be given time to transition to new requirements. This transition period will be determined as part of the development process. ASC has a comparison tool available [here](#) to compare current standard content vs. ASC Farm Standard content. This will support producers in understanding how the new Standard affects them.

20. Will the alignment bring auditing efficiencies?

The standardized content of the ASC Farm Standard will allow auditors to more easily assess different species. There will remain species-specific content where specific training may be needed.

21. How will this affect the cost of certification?

The cost of certification depends on many factors, of which standard content is only one. ASC will conduct an extensive piloting phase in 2022 to evaluate the implications of the ASC Farm Standard on farm operations. This will inform the final draft of the Farm Standard.

22. How will CABs be trained for this new standard?

ASC provides training to auditors on the current standards already. Following that same mechanism, auditors will also be trained on the ASC Farm Standard. Efficiencies will be gained as auditors no longer need separate training courses for each standard.

23. Where can I find more information?

If you want to read more about the ASC Farm Standard and its development process, please [click here](#).

24. How can I participate and provide feedback?

ASC welcomes and encourages all interested stakeholders to take part in our survey or our workshops, please [click here](#) for the survey and [here](#) for all other information on ways to engage in the consultation.

25. Does the ASC Farm Standard include animal welfare requirements?

Yes, the standard released in 2023 will contain animal welfare requirements. However, the introduction of welfare requirements will be a phased process, with specific content applicable to finfish species first. More detail on the requirements and this approach will be available in the September 2022 consultation.

26. To what extent does the ASC Farm Standard help protect human safety?

A number of indicators protect the people working in aquaculture. For example, Criterion 3.5 has 20 wide-ranging indicators on health and safety, and human safety is also protected through Criteria 3.2 and 3.3 on forced labour and child labour and 3.9 on working hours. In addition, Indicator 1.1.3 requires that the Unit of Certification (UoC) complies with all applicable labour-related laws and regulations and 1.1.1 ensures that the UoC is in possession of all required legal licenses and permits. On top of this, the Risk Management Framework focuses on health and safety risk assessment and requires the UoC to put a Risk Management Plan in place for the protection of employees' safety.

27. Will the Risk Management Framework completely replace the need for consultants?

The Risk Management Framework will be designed to be accessible and easy to use with substantial guidance, and with the intention of reducing farms' reliance on consultants. However, there are likely to be sensitive or complex situations, or areas of medium or high risk, where the farm will need to bring in an expert consultant to work with them. The intention is that the farm just brings consultants in as needed, and not to complete the whole Framework for them. See the video [here](#).

28. To what extent does the Risk Management Framework consider the effects of climate change, particularly influencing escape events?

The Risk Management Framework will consider a wide range of drivers of risk of different events and elements that increase risks, which includes the effects of climate change, and will take note of events like heavy rainfalls or storms. Climate change will influence multiple aspects of the ASC Farm Standard.

29. Currently Area Based Management requirements are limited to the Salmon Standard. Is this still the case in the ASC Farm Standard?

Area Based Management is now broadened to all cage culture farms, with emphasis on disease and parasites. Specific salmon requirements are included as well.

SPECIFIC QUESTIONS ON PRINCIPLE 2 (P2)

2.2 ECOLOGICALLY IMPORTANT HABITATS (INCLUDING MANGROVES):

30. Is species X included in Criterion 2.2?

All indicators of ecologically important habitats are applicable to all species. This criterion addresses all main impacts that farm siting can have on natural areas of special concern (for example protected areas and areas of high conservation value) and therefore is relevant to the siting of any aquaculture operation.

2.3 WILDLIFE INTERACTIONS:

31. Why has ASC replaced specified mortality limits with requirements for reporting and corrective actions?

Applying global mortality limits does not take into account the statuses of local populations that would be impacted by those limits. Given the variability across production systems and regions, ASC reviewed the intent which underpins all current standards on these requirements. Therefore, ASC proposes to remove metric limits for predator mortality focusing instead on a zero limit for threatened/protected species and a requirement for no intentional killing of other species unless all other avenues have been pursued.

A key component of these revisions is the new Risk Management Framework which aims to ensure that farms have a good understanding and risk-based approach to managing wildlife interactions. Strengthened reporting requirements will ensure ASC maintains a firm understanding of wildlife mortalities on ASC certified farms, and the consequences of those mortalities will inform future programme revisions and contribute to information on wildlife interactions. These changes are consistent with the intent of current standards to strive to minimise mortalities.

2.4 NON-NATIVES:

32. To what extent can a fully closed RAS system guarantee zero escapes?

No system can guarantee zero escapes; however, the probability of escapes is less likely in a fully closed RAS compared with cage culture or pond culture. A fully closed RAS has the most limited interactions with the natural environment and is therefore considered by ASC to be the most robust at meeting the intent of this indicator.

33. What motivated ASC to reconsider permitting transgenic species?

ASC received extensive feedback from stakeholders during the March 2021 public consultation on the proposed indicator to permit the culture of transgenics under specific (escape-proof) conditions. It was clear from the feedback that given the unknowns of the impacts on human health and the environment, and concerns regarding consumer labelling, that ASC should take the precautionary approach. ASC recognises that there may be benefits in culturing transgenic species in terms of resource efficiency and carbon footprint. However, ASC will remain aligned with our current standards in prohibiting the culture of transgenics.

2.5 ESCAPES:

34. Will 98% accuracy in fish counts be required for farms of all fish species?

It will be required for all finfish cultured in cage culture and sits in line with the current requirements for species including salmon, sea bass, and tropical marine finfish.

2.6 BENTHIC IMPACTS:

35. Will the benthic Criterion have a limited scope of cage production only?

The Benthic Impacts Criterion will apply to all production systems and species. Currently, the Technical Working Group (TWG) supports ASC's proposed revised indicators and requirements for marine systems (cages and suspended mollusc). ASC is proposing to maintain current standard requirements for systems that discharge into rivers (i.e. macroinvertebrate surveys in the receiving water body downstream and upstream of the effluent discharge point). For systems that discharge into lakes and reservoirs, the TWG has identified several core elements of a recommended approach for revised indicators, though the work is still under development.

36. How does the tiered approach work?

Under the revised approach as proposed in this draft, a farm will conduct increasingly more detailed benthic analysis if initial results in Tier 1 or Tier 2 do not meet the established limits. A farm that meets the limits in Tier 1 or Tier 2 does not need to conduct additional analysis in the subsequent Tier 3. Therefore, well managed farms are granted cost efficiencies in benthic monitoring.

37. Does this tiered approach completely remove the needs of modelling to set an Allowable Zone of Effect (AZE)?

The proposed requirements remove the requirement for deposition models to determine monitoring locations based on the prediction of the Allowable Zone of Effect (AZE) for two reasons. First, monitoring is a more generic approach that addresses the uncertainty of impact predictions. Second, the organic waste deposition rate threshold originally believed to define a significant adverse effect is now known to be highly variable and site-specific owing to variations in the capacity of local physical, chemical and biological processes to assimilate these wastes. Any

predicted AZE based solely on physical particle deposition modelling can be expected to entail a high degree of uncertainty.

However, it is important to note that the sampling ranges shown in the revised requirements do not preclude the continued use of deposition models to define sampling locations, as long as the predicted site-specific AZE does not fall outside the specified 30 metre boundary of the farm. Permitting the extension of this boundary would conflict with the definitions of the acceptable spatial scale of impacts as defined by the revised requirements.

2.8 SALINISATION:

38. Impermeable bottom protection only works if soil is 100% covered. Will the auditor verify that liner is used in all ponds in farms located in salinisation sensitive areas? How will this be effective when at the same time the farm must be audited when fully in production, with ponds full of water?

The auditor will verify that liners are in use at all required ponds. Examples of verification include invoice records for purchasing liners, records of deployment, underwater cameras, photos, maintenance records, and so on. Verification does not necessarily entail viewing an empty pond.

2.9 SLUDGE (BIOSOLIDS):

39. Are all species concerned, including bivalves?

The scope is “all land-based systems, and other systems capturing or recovering biosolids”. There are no species-specific requirements.

2.10 FRESHWATER USE:

40. Will the Farm Standard allow RAS facilities to use potable (drinking) water?

If the water is used according to permits, and parameters around responsible use are followed (such as respecting minimum vital flow), potable water may be used for production.

41. A number of metrics have been removed from this indicator, does this indicate a weakening of the standard?

No, the current indicators focus on the responsible use of water resources within the local context. Setting a single metric value across regions does not account for water availability within that ecosystem and therefore the intent of the indicator was not necessarily met by metric indicators.

42. What is the rationale for disallowing freshwater to reduce salinity if use is properly monitored and not negatively impacting other users?

Adding salt to freshwater may be considered “downgrading” a higher-value resource. In addition, pumping freshwater from wells into saline systems may result in saline water leaching back into wells and irreparably damaging the resource.

43. In areas where there are multiple users of a water resource, how does a farm determine their portion of the impact?

Without robust analyses of all users of a water system, it is not expected that a farm could quantify exactly their impact. Instead, farms are expected to build an understanding of what other users are relying on the resource to better understand the context in which they operate. This, combined with monitoring the farms’ annual water use, will build a broader understanding of the farms’ impact, while monitoring total use will create a baseline for which improvement can be measured.

2.11 ENERGY USE AND GREENHOUSE GAS EMISSIONS:

44. Will there be guidance that helps farmers to identify the supply chain start and end points for their estimations of Greenhouse Gases (GHGs)?

Yes, and this guidance is still in development, with the aim that it is available when the Standard is released. We know from life cycle assessment research that a limited number of inputs/parameters are responsible for driving the GHG impact of most seafood systems, so focus will be on capturing those key inputs. Annex 2 of the ASC Farm Standard on Data Recording and Submission aims to ensure the consistency, comparability and transparency of submitted data. Providing guidance for the scope of assessment, assumptions, and data sources, will result in a more consistent approach than having farms each develop their own method for calculations. Examples include dividing on-farm energy inputs between multiple species or year classes present at the same time, or estimating fuel used by contracted vessels that may service more than one farm.

In most cases, hatchery production contributes negligibly to overall GHGs, but in cases where juveniles are grown to a larger size before grow-out or are transferred to an intermediate site, we will need to provide guidance on how to capture relevant emissions there.

45. Will GHG calculations be extended beyond the farm to harvesting stations, processing plants, delivery, etc?

The requirements in the indicators only go up to the point of harvest, so exclude post farm-gate activities. Our own research, communications, and calculators can extend past this point, but it is beyond the scope of the indicators and will be beyond the scope of what data needs to be submitted. From life cycle assessment literature, processing, packaging, and distribution typically contribute relatively little to overall emissions, with an important exception being when products are transported by air.

Food losses along the supply chain up to point of sale can also contribute as a multiplier of GHG emissions. Any comparisons we make with other food production systems or between species should also consider some post-farm variables, particularly the yield of edible flesh and/or protein from fish, which can vary a lot but can be roughly assumed based on the species.

46. Is the subject of Blue Carbon, such as Integrated Multi-Trophic Aquaculture (IMTA) and cultivation of seaweed, covered in this calculation?

No. Though there is a lot of interest in this topic, it is something that will require research and outreach with the academic community. Carbon offsetting is typically excluded from GHG accounting frameworks, and can instead be communicated separately.

47. What types of systems are likely to use the most and least energy?

There is substantial variation between farms in almost every metric, so it is important to assess farms on their individual performance. In addition, the actual impact of that energy use in terms of GHG ultimately depends on the source of the energy, and whether it is renewable or from fossil fuels. But speaking very generally, the most energy-intensive aquaculture systems tend to be land-based systems, particularly RAS and some pond systems. These are also the systems for which we see energy contributing heavily to the overall carbon footprint and for which energy reduction efforts are more likely to yield a GHG benefit.

Conversely, the lowest energy-use systems tend to be marine- or lake-based pens/cages and coastal bivalve and seaweed culture: systems where things like temperature regulation and oxygen levels are maintained naturally without requiring additional energy. For these low energy input systems, energy is unlikely to be a significant driver of GHG emissions, and energy reduction efforts are less likely to contribute meaningfully to GHG mitigation.

48. How much does aquaculture contribute to global GHG emissions?

Food systems in general account for between a quarter and a third of global GHG emissions caused by human activity. That impact is driven particularly by production of ruminant animals (such as beef) and deforestation to support animal feed production. Aquaculture contributes relatively little to that overall impact, but with substantial variation between production systems and species.

While making up only a small amount of global emissions, there are many opportunities for aquaculture products to contribute to climate change mitigation beyond reducing their own impact, including rebuilding and supporting natural ecosystems and providing low GHG products as alternatives to higher GHG animal proteins like beef and lamb.

49. How do aquaculture products compare to other animal protein products?

While the methodology of studies varies, some general patterns are apparent in life cycle assessment literature. The highest GHG animal proteins tend to be from ruminant animals such as beef and lamb, driven by enteric fermentation (“cow burps”) and by feed production.

Net pen salmon production is often shown to have a similar GHG impact to chicken and to the “average” wild capture fishery. Bivalve systems can have very low GHG emissions compared to others, but the basis of comparison here matters a lot (e.g. live weight vs per gram of protein).

While aquaculture systems vary widely in their GHG impacts, overall the industry produces many products at a lower GHG cost than many land-based animal systems.

50. Are ASC-certified products likely to have a lower GHG impact than other aquaculture products?

In some cases, yes. ASC has restrictions on siting farms in deforested mangrove land and restrictions on the use of feed inputs from some deforested regions where a demonstrable climate change impact is associated with that deforestation. Land use change contributes heavily to the impact of some aquaculture systems, so this differentiation with non-certified production is likely to mean that ASC products avoid some potentially large drivers of GHG impact.

However, in terms of other feed inputs and energy inputs, there are no clear indications that ASC-certified products would necessarily have a lower GHG impact. This is something that longer-term systematic data collection on the estimated emissions of certified farms will help to inform going forward, allowing us to identify and target particular opportunities for improvement to be able to demonstrate the climate benefits of certification.

2.13 FEED

51. Does the ASC Farm Standard include feed requirements? Are these the same as in existing ASC standards?

Specific values for things like Forage Fish Dependency Ratio will be moved into an Annex. All content regarding sourcing of feed ingredients is now in the ASC Feed Standard. Feed ingredients are covered in the ASC Feed Standard; Feed use is covered in the ASC Farm Standard.

52. Has the wording of indicators and requirements been aligned with the wording of the new ASC Feed Standard where appropriate?

We have worked on this and also gone further to improve the indicators and ensure alignment with the requirements of the Sustainable Supply Chain Initiative (SSCI). We will be updating the Feed Standard in future to ensure complete alignment but for now it is as close as can be. Some of the alignment with SSCI requirements have

caused minor differences between the language of the ASC Farm Standard and the ASC Feed Standard, but these will be aligned in future.

2.15 PARASITE CONTROL (INCLUDING SEA LICE):

53. Does the Weighted Number of Medicinal Treatments (WNMT) index still apply?

The requirements around the Weighted Number of Medicinal Treatments (WNMT) still apply and are included in Criterion 2.15.

54. How were the revised sea lice requirements set? Do they simply rely on national regulations?

No, the revised requirement does not rely on regulations to define sea lice limits. The revised requirement sets regionally relevant sea lice limits and, as a starting place, the revised requirement uses the lowest sea lice limit established in the different regions today as the ASC Sea Lice Thresholds (established either by the regulators or through an industry code of practice, whichever is lower).

ASC will remain open to evidence that would compel it to change these limits and be attentive to the results of regulatory updates. ASC will annually review sea lice limits in the different regions and update its sea lice thresholds accordingly.

To assist in its deliberation, the Technical Group (TG) supporting ASC in this revision looked at data that showed 94.3% of Norwegian farms stayed completely below the country's sea lice threshold during the established sensitive period in 2020 (i.e., zero days), and fewer than 1% of farms exceeded by more than 2 weeks. The TG did not have similar data compiled from other jurisdictions.

55. Do the sea lice requirements use trigger limits?

The revised requirement does not define trigger levels but absolute limits: **farms shall not reach or exceed those absolute limits**. Moreover, a farm will become non-conforming if fails to maintain sea lice levels below the absolute limits established by the ASC Sea Lice Thresholds. This approach is considered more protective to wild salmonids populations than the approach used by some regulators of establishing trigger levels, which would typically require some kind of management response only when a farm reaches or exceeds the trigger level.

2.16 ANTIBIOTICS AND OTHER VETERINARY THERAPEUTANTS

56. Are the rules for antibiotic use now the same for all ASC species?

Antibiotics cannot be used on ASC-labelled shrimp. Antibiotics may be used on all other ASC species, with a number of important restrictions such as the prohibition of prophylactic (preventative) use.

57. Can antibiotics listed by the World Health Organisation (WHO) be used by ASC farms?

Antibiotics on the WHO's Critically Important Antimicrobials for human use list may only be used under exceptional circumstances, and if applied to products then these products are no longer eligible to carry the ASC label.

58. Can seafood be sold with the ASC label if critically important antibiotics have been used in its production?

No. These antibiotics can only be used under exceptional circumstances, and if applied to products then these products are no longer eligible to carry the ASC label.

59. Why is the use of critically important antibiotics permitted? Will this increase the risk of antimicrobial resistance?

It is important to note that critically important antibiotics can only be used under exceptional circumstances, and if they are applied to products, these products are no longer eligible to carry the ASC label.

The nature of bacteria means there is always a risk of resistance building up. To mitigate this risk as much as possible means:

- a) Treating diseases effectively. This means applying the best antibiotic in that specific context, and this may in exceptional circumstances be a critically important antimicrobial.
- b) Not exposing bacteria to antibiotics without reason. This means not using antibiotics preventatively.

60. Does the ASC still have a maximum amount of antibiotic treatments?

Yes, these requirements are included in Criterion 2.16. In addition, farms will be required to reduce their use of antibiotics.

61. Do the changes to antibiotic requirements represent a greater tolerance of antibiotic use?

All changes are based on the latest evidence, and the requirements on antibiotics stay mostly in-line with the current ASC standards, with additional requirements in some cases, such as the need to reduce antibiotic use over time.

62. How do the antibiotics requirements address ASC's objective to minimise impacts on the environment?

The primary focus is preserving human health and animal health, which is why antibiotics may only be applied when needed. Another priority is to reduce the build-up of antibiotics, or residues thereof, in the environment, which is why, where possible, treatment water should be retained until substances are neutralized.

2.17 HATCHERIES AND INTERMEDIATE SITES

63. Compliance to the Standard may require significant financial and time commitment by many seed or hatchery suppliers, how will ASC ensure they engage in the process?

The ASC is not fully achieving its mission if environmental or social impacts are occurring upstream of certified facilities. Just as ASC requires Chain of Custody coverage downstream of the farm, upstream impacts need to be considered as well.

However, we understand that adjusting to these requirements will take time, and effective periods will be set giving time to become familiarised with the requirements, based on realistic timelines for adherence. In addition, many elements of the Standard will be not applicable to hatcheries or seed suppliers based on the type of production. Further exceptions will be made for very small-scale producers (the definition of small-scale is to be determined).

ANNEX 3: RISK MANAGEMENT FRAMEWORK

64. What is the Risk Management Framework?

ASC is developing a tool to help producers with identifying and mitigating the social and environmental risks associated with their operations. This tool brings forward an adaptable approach that will raise awareness of farm-specific risks without compromising the rigour of the ASC Standards.

ASC works with many different farmers and companies operating on many different scales and in many different settings around the world. We recognize that our standards and assurance systems must be flexible to adapt to these varied contexts. Through assessment of the risks that farming operations present on social and environmental criteria, farmers can better plan their activities to mitigate any risks that are present and monitor their mitigation measures to meet relevant ASC requirements.

The following questions and answers provide an overview of the approach and its application.

65. What is risk management?

Generally, risk management is a process by which risks to key areas are identified through assessment, which then permits for targeted and effective planning to reduce the identified risks. In this context, the Risk Management Framework will walk farmers through a process of identifying their risks of impact on the environment and people who live and work on and around the farm, as captured in ASC's key social and environmental criteria. The process will result in farms identifying where the risk of impact may be low, medium, or high, and provide for measures to be taken to reduce any identified risks.

66. Why is the ASC bringing risk management into the Farm Standard?

This approach targets the needs of a particular operation through specific assessment of risk and management of those risks. The Risk Management Framework focuses on identifying and mitigating risks rather than simply reacting once issues occur.

The approach allows adaptability without compromising rigour. Assessment of risks will be specific to the operation but will require a robust and evidence-based verification process. The process will benefit farmers through raising awareness of their specific situation with respect to social and environmental risks, while also providing information that may help farmers make better informed decisions regarding their operations.

67. Which aspects of the Farm Standard will utilize the Risk Management Framework?

Indicators for assessment, planning and implementation of the RMF are captured across four social criteria and six environmental criteria.

- Criterion 2.2 – Ecologically Important Habitats
- Criterion 2.3 – Wildlife Interactions
- Criterion 2.4 – Non-native Species
- Criterion 2.5 – Escapes
- Criterion 2.8 – Salinisation
- Criterion 2.10 – Freshwater Use
- Criterion 3.2 – Forced, Bonded, Compulsory Labour and Human Trafficking
- Criterion 3.3 – Child Labour
- Criterion 3.5 – Health and Safety
- Criterion 3.13 – Community Engagement

The Risk Management Framework is consistently applied across these criteria, providing an adaptive and transparent approach to a farm's specific situation. The results highlight those specific areas that may require additional attention, while also recognizing those areas of low risk.

68. How will it work?

The Risk Management Framework will provide a structured process for farms to inform and facilitate a risk-based approach to the requirements of the ASC Farm Standard.

Farmers will navigate the tool to identify the risks from predesignated drivers of risk that are relevant to their operations and location and provide evidence through the assessment. The tool assesses the information and produces a risk level for each applicable risk factor. Based on risk levels identified, farmers will develop measures to reduce medium and high risks, identify indicators and develop a plan to monitor the effectiveness of that mitigation.

The approach will create efficiencies in the auditing process. In advance of an audit, assessment bodies will be able to access a report from the tool, highlighting areas of risk for the farm. In this manner, the tool will facilitate the auditor's understanding of

the situation of the farm, thereby resulting in efficiency gains through the auditing process.

69. Who completes these and how will it be accessed?

The tool will be accessible through a software app with clear guidance to facilitate the inputs. It is the farm's responsibility to complete the assessment, whether done by a designated member or representative of the farm or with input from a consultant. The process will begin with information on the profile of the farm to identify key contributions to social and environmental impacts. Assessment bodies will have access to a farm's assessment and report for auditing purposes. The process will generate a public facing summary report to accompany audit reports.

70. Will this replace current requirements for BEIA and pSIA?

Current standard requirements for biodiversity environmental impact assessments (BEIA) and participatory social impact assessments (pSIA) are extensive and do not target the areas of impact by the farm, but rather provide broader expert assessments that are critical to meet certain ASC requirements. The ASC Farm Standard will remove the explicit requirements for these two assessments, however key impact areas will require assessment under the Risk Management Framework tool, with the same attention to evidence-based analysis.

In instances where a farm has a BEIA, pSIA or similar, the outputs from those assessments will be accepted by the tool, with certain eligibility requirements.

71. How does this work with metrics-based indicators?

The ASC Farm Standard draft proposes metric indicators, Risk Management Framework (RMF) indicators and reporting indicators. In some instances, metric-based requirements in ASC's species-specific standards have been adapted to the RMF approach. This critical step recognizes that certain metric limits are not appropriate for global applicability but will still recognize where there are high potential impacts that must be addressed and recorded, for wildlife interactions for example, and direct measures to mitigate and require detail reporting to maintain transparency.