



## ASC Public Consultation – PC Questions

### Public Consultation on Draft ASC Farm Standard v0.1

Welcome to ASC's public consultation on the draft aligned ASC Farm Standard v0.1 and thank you for taking part. Currently, seafood produced through aquaculture can be certified using eleven species-specific ASC standards. The aligned Farm Standard aims to create a unified set of requirements applicable to all species and production systems. The aligned ASC Farm Standard addresses key aquaculture impact areas including impacts on surrounding water bodies, wildlife and sensitive habitats, protection of animal health and responsible medicine use. The standard also addresses social impacts including working conditions on farms and interactions with surrounding communities.

We invite you to provide feedback on the draft ASC Farm Standard v0.1 and to share this consultation survey within your network. You can forward the general [survey link](#). Please check [the ASC website](#) if you need more information on the proposed Standard or planned consultation events. This public consultation is open until **30 April 2022**.

#### *Things to note*

- You can save your survey response at any point and return to it later.
- There is a printable preview (*this document*) of the entire survey, in case you wish to discuss it within your organisation first.
- Please use the "Next" and "Back" buttons at the bottom of each page instead of your browser back button.
- After some basic questions about you, select the topics (specific criteria) of interest to you and provide your feedback.
- The number of criteria you select and how much you have to say determines how long the survey will take. We really appreciate every comment you take time to make.

Please contact [consultation@asc-aqua.org](mailto:consultation@asc-aqua.org) with any issues.



## Public Consultation questions

- As part of our commitment to transparency, consultation feedback is made public, including on ASC's website. ASC will publish a list of who submitted feedback (name and affiliation only) but will not attribute individual comments. No personal data will link specific responses to respondents. However, comment fields will be published in full including any information you include. We will not publish or share your contact details with third parties.

By filling in this survey, I agree with my responses being made public.

Yes/No\* If you choose NO, you won't be able to complete this survey.

- Name and surname\*
- Job Title
- Organisation Name\*

[...]

Not applicable

- Type of affiliation (select the one that describes your organisation most accurately). Please note that the questions you will see are based on the type of stakeholder you indicate to be.\*
  - Farm (producer) or association thereof
    - We are ASC certified Y/N/Not applicable\*
    - We are an SME (Small or Medium sized enterprise) / Large producer / I don't know / Prefer not to say\*
    - Number of employees  
0-9; 10-24; 25-99; 100-249; 250-499; 500 or more
    - What type of production systems do you apply on your farm?\*

Type	Characteristics
<b>water-based system</b>	<b>cages, pens, inshore/offshore, longlines</b>
marine cages	
suspended mollusc system	
water-based system in lake or reservoir	
other water-based system	
<b>land-based system</b>	<b>rain fed ponds, irrigated or flow-through systems, tanks, raceways, excluding recycling systems</b>



<b>recycling system</b>	<b>high control enclosed systems, water reuse, excluding RAS</b>
<b>RAS</b>	<b>highly technical recirculating aquaculture system</b>
<b>integrated farming system</b>	<b>integrated multitrophic aquaculture (IMTA), aquaponics, irrigation ponds</b>
<b>Other</b>	<b>please specify</b>

- What species do you produce on your farm?\*
- ii. Feed mill
- iii. Primary processor (production country) or association thereof
  - We are ASC certified Y/N
- iv. Secondary processor (trader) or association thereof
  - We are ASC certified Y/N
- v. Foodservice/catering or association thereof
  - We are ASC CoC certified Y/N
- vi. Retail/brand or association thereof
  - We are ASC CoC certified Y/N
- vii. (Representative of) consumer(s)
- viii. Environmental NGO
- ix. Social NGO
- x. Academia / Research
- xi. Veterinarian
- xii. Government/regulator
- xiii. Intergovernmental organisation
- xiv. CAB / Auditor
  - 1. What countries do you operate in?
  - 2. What species do you certify?  
Other – please specify:
  - 3. What production systems do you certify?
- xv. Consultant
  - 1. What do you consult on?
- xvi. Sustainability certification scheme
- xvii. (Representative of an) affected community
- xviii. Concerned citizen



- xix. ASC TAG member
  - xx. ASC Board member
  - xxi. Other – please specify:
6. Are you responding on behalf of your organisation? Yes/No/Not applicable
7. Email Address\*
8. In which country are you based?
9. In which region do you operate?
- a. Globally
  - b. In the country I specified in the previous question only
  - c. Africa
  - d. Asia
  - e. Europe
  - f. North America
  - g. Oceania
  - h. South America
  - i. Other – please specify:
10. How did you find out about this public consultation?
- a. ASC newsletter - global 'ASC news flash' or a 'local ASC newsletter'
  - b. ASC email about the consultation specifically ('mass mail notification')
  - c. Banner at the bottom of ASC emails
  - d. ASC Twitter
  - e. ASC Facebook
  - f. ASC LinkedIn
  - g. ASC website
  - h. Press release
  - i. Personal contact with ASC employee
  - j. Other – please specify:
11. I may be contacted for follow up questions: Yes/No
12. You will now be asked specific questions on elements of the Standard. Every criterion page starts with the proposed standard text for that criterion and allows you to give feedback to that, followed by questions specifically for the criterion. Wherever possible, please provide examples and explanations so that ASC fully understands your comments. Please propose amended wording for standard text, especially the indicators, when you think changes are necessary.  
Please select the criteria you're interested in:



## **PRINCIPLE 1: THE UOC OPERATES LEGALLY AND APPLIES EFFECTIVE BUSINESS MANAGEMENT**

- CRITERION: 1.1 – LEGAL COMPLIANCE
- CRITERION: 1.2 – MANAGEMENT SYSTEM
- CRITERION: 1.3 – BUSINESS ETHICS
- CRITERION: 1.4 – TRACEABILITY AND TRANSPARENT DISCLOSURE

## **PRINCIPLE 2: THE UOC OPERATES IN AN ENVIRONMENTALLY RESPONSIBLE MANNER**

- CRITERION 2.1 - THE UOC IS IN COMPLIANCE WITH APPLICABLE ENVIRONMENTAL REGULATIONS
- CRITERION 2.2 - ECOLOGICALLY IMPORTANT HABITATS
- CRITERION 2.3 - THE UOC MINIMIZES WILDLIFE INTERACTIONS
- CRITERION 2.4 - THE UOC AVOIDS THE CULTURE OF NEW NON-NATIVE SPECIES
- CRITERION 2.5 - ESCAPES
- CRITERION 2.6 – BENTHIC IMPACTS
- CRITERION 2.7 - WATER QUALITY
- CRITERION 2.8 - SALINISATION
- CRITERION 2.9 – BIOSOLIDS
- CRITERION 2.10 – FRESHWATER USE
- CRITERION 2.11 - ENERGY USE AND GREENHOUSE GAS EMISSIONS
- CRITERION 2.12 - MATERIAL USE, WASTE AND POLLUTION CONTROL
- CRITERION 2.13 - FEED
- CRITERION 2.14 – FISH HEALTH AND WELFARE
- CRITERION 2.15 - PARASITE AND PATHOGEN CONTROL
- CRITERION 2.16 - ANTIBIOTICS AND OTHER VETERINARY THERAPEUTANTS
- CRITERION 2.17 - HATCHERIES AND INTERMEDIATE SITES
- CRITERION: 2.18 - AREA BASED MANAGEMENT

## **PRINCIPLE 3 - THE UOC OPERATES IN A SOCIALLY RESPONSIBLE MANNER**

- CRITERION: 3.1 – RIGHTS AWARENESS
- CRITERION: 3.2 – FORCED, BONDED, COMPULSORY LABOUR AND HUMAN TRAFFICKING
- CRITERION: 3.3 – CHILD LABOUR
- CRITERION: 3.4 – DISCRIMINATION
- CRITERION: 3.5 – HEALTH AND SAFETY
- CRITERION: 3.6 – COLLECTIVE BARGAINING AND FREEDOM OF ASSOCIATION
- CRITERION: 3.7 – TRANSPARENT CONTRACTS
- CRITERION: 3.8 – WAGES
- CRITERION: 3.9 – WORKING HOURS
- CRITERION: 3.10 – WORKPLACE CONDUCT RESPONSE
- CRITERION: 3.11 – EMPLOYEE ACCOMMODATION



CRITERION: 3.12 – GRIEVANCE MECHANISM

CRITERION: 3.13 – COMMUNITY ENGAGEMENT

- I do not wish to provide feedback on specific criteria.

Per criteria we will ask:

1. What, if anything, would you like to see changed in this criterion? Select all answers that apply:

a. Rationale

The rationale should summarise why the criterion and its associated impacts should be included in evaluation of responsible aquaculture practices.

b. The intent statement

The Intent statement should communicate the desired state from the rationale.

c. The scope definition(s) in this criterion (applicability to production systems/species)

d. The appendices to this criterion

Please check the appendices in the full standard document.

e. The indicators

i. Please select all the indicators you would like to provide comments for. When possible, please include proposed new indicator language in your feedback.

f. Nothing – I agree with this criterion and how it is phrased.

2. In this proposed standard we introduce a Risk Management Framework (RMF). This criterion includes a link with the RMF.

*In effect, one of the following criteria:*

*P2: 2.2, 2.3, 2.4, 2.5, 2.8, 2.10,*

*P3: 3.2, 3.3, 3.5, 3.13*

<p>The link with the Risk Management Framework in this criterion is clear.  <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree</p> <p>Why or why not?*</p> <p><u>Comment box</u></p>	Feasibility	Producers, CABs	Survey Workshop 1:1
<p>It is clear how the farms comply with the Indicators concerning the Risk Management Framework.  <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree</p>	Feasibility	Producers, CABs	Survey Workshop 1:1



Why or why not?*			
Comment box			

Criteria no.	PC Question	Q categorisation	Audience	Type of engagement
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1.1	<p>The rationale for Criterion 1.1 states that all ASC certified farms are expected to comply with local and national laws and regulations. The intent is that farms comply with applicable laws and regulations and are in possession of all required legal licenses and permits.</p> <p>Is it necessary to specify what other laws and regulations are “applicable” to ASC certification, besides those covered by Indicators 1.1.1-1.1.3?</p> <p>a. No, it is not necessary to specify. It can be treated on a case-by-case basis.</p> <p>b. Yes, other types of applicable laws should be specified. Please select which below:</p> <ol style="list-style-type: none"> <li>1. Business, operations, and financial laws</li> <li>2. Transparency and impartiality laws</li> <li>3. Record-keeping and reporting laws</li> <li>4. Food safety and public health laws</li> <li>5. Animal welfare laws</li> <li>6. Packaging, labelling and product-related laws</li> <li>8. All laws are applicable</li> <li>9. Other – please specify:</li> </ol>	Approval	General	Survey
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1.3	<p>Indicator 1.3.1 The UoC shall prevent acts of corruption<sup>1</sup>, extortion, embezzlement or bribery.</p> <p>What challenges do you envision for Small and Medium sized Enterprises to implement indicator 1.3.1?</p> <p>Comment box</p>	Feasibility	SME producers, Social NGOs	Workshop 1:1
1.3	<p>Indicator 1.3.1 The UoC shall prevent acts of corruption<sup>2</sup>, extortion, embezzlement or bribery.</p>	Information	General	Survey

<sup>1</sup> Corruption: See Definition List

<sup>2</sup> Corruption: See Definition List



	<p>Do you think Indicator 1.3.1 should be classified as a Critical Indicator, meaning that if any non-compliance is detected the farm is immediately suspended?</p> <p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree</p>			
1.3	<p>Indicator 1.3.2 The UoC shall ensure that records are not falsified, or manipulated and information is not misrepresented.</p> <p>What challenges do you envision for Small and Medium sized Enterprises to implement indicator 1.3.2? Comment box</p>	Feasibility	SME producers, Social NGOs	Workshop 1:1
1.3	<p>Indicator 1.3.2 The UoC shall ensure that records are not falsified, or manipulated and information is not misrepresented.</p> <p>Do you think Indicator 1.3.2 should be classified as a Critical Indicator, meaning that if any non-compliance is detected the farm is immediately suspended?</p> <p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree</p>	Information	General	Survey
1.4	<p><u>Which situation is preferable:</u></p> <p>(1) Farms must buy only ASC-compliant feed, which may be either segregated or mass balance. Farms and supply chain companies are required to identify and separate ‘fish fed ASC-compliant segregated feed’ from ‘fish fed ASC-compliant mass balance feed.’ This creates two types of ASC certified seafood which must always be kept separate using different claims, and has implications throughout the supply chain. Retailers and companies throughout the chain can exercise buying preferences for fish fed segregated feed.</p> <p>(2) Farms must buy only ASC-compliant feed, which may be either segregated or mass balance. Fish produced on compliant feed can be sold as ASC certified. All ASC certified fish is treated the same in the supply chain with equal claims (current situation). However, companies later in the chain beyond the farm cannot distinguish or prefer ASC fish fed segregated feed.</p> <p>(3) Another situation would be preferable – please describe.</p>	Approval / Information	Producers, CABs, Retail/Brands	Workshop 1:1





Criteria on no.	PC Question	Q categorisation	Audience	Type of engagement
2.2	<p>Indicator 2.2.3 (and related): Apart from PAs (protected areas), HCVAs (high conservation value areas), and mangrove ecosystems, the indicators also address sensitive and critical habitats and natural wetlands. In the context of this criterion the following scopes apply:            Sensitive habitats – In addition to those not captured by other habitat definitions, specifically include coral reefs and seagrass beds            Critical habitats - habitats on which threatened and protected species depend            Natural wetlands - marsh, fen, peatland, intertidal zone, estuaries, marine water shallower than six metres at low tide; permanent or temporary, with water that is static or flowing, fresh, brackish, or marine.</p> <p>Does this list include all types of habitats to be addressed? Yes/No            If no, please specify:</p>	Information	NGOs, Academia	Survey Workshop, 1:1
2.2	<p>In the context of this criterion the following scopes apply:            Sensitive habitats - In addition to those not captured by other habitat definitions, specifically include coral reefs and seagrass beds            Critical habitats - habitats on which threatened and protected species depend            Natural wetlands - marsh, fen, peatland, intertidal zone, estuaries, marine water shallower than six metres at low tide; permanent or temporary, with water that is static or flowing, fresh, brackish, or marine.</p> <p>ASC certified farms assess their impact on protected areas and areas with high biodiversity value, including mangroves. Do you agree that ASC certified farms should also assess the impact of their siting on other sensitive and critical habitats?            ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree.            Free comment-box. Free comments can only be given if a ranking has been selected prior.</p>	Approval	General	Survey, Workshop-Survey
2.2	<p>Do you support a “site-specific” approach to determine necessary ecological buffer-width in relationship to relevant habitats (e.g., riparian buffers, protected areas, sensitive/critical habitats) and ecological functions to be protected.            ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree.            Free comment-box. Free comments can only be given if a ranking has been selected prior.</p>	Approval	General	Survey, Workshop-Survey
2.2	<p>ASC recognises that certain small scale aquaculture operations may have only had access to farm land after 1999. Should ASC consider a requirement that permits farm siting in mangroves after 1999, but only with the requirement that the farm must restore the same area (at least 100% of lost surface area) with same ecological functions?            Yes / No / No opinion            Free comment-box will be made available as well. Free comments can only be given if an answer has been selected prior.</p>	Information	Environmental NGOs, Small & large farms Retail/brands	Survey, Workshop, 1:1



Criteria on no.	PC Question	Q categorisation	Audience	Type of engagement
			Academia / Research Government /regulator CAB / Auditor	
2.3	<p>Indicator 2.3.2 The UoC shall not intentionally or unintentionally kill mammals, elasmobranchs, birds, or reptiles (excluding vermin), unless for situations<sup>3</sup> where injured animals are unlikely to recover, situations evidently threatening human safety, or where legal requirements mandate euthanasiation.</p> <p>Vermin: Vermin are pests or nuisance animals that spread diseases, harm or prey upon production species. The term is defined in relation to human activities, and therefore species may vary by region and in time. In the context of the ASC standard, threatened and protected species cannot be classified as vermin. A species may be listed as vermin by authorities, refer to listings, such as Wildlife Acts, wherever available.</p> <p>Do you agree with the proposed Indicator 2.3.2 to not allow any mortalities of mammals, elasmobranchs (sharks), birds or reptiles, unless any of the listed conditions apply? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. Free comment-box will be made available as well. Free comments can only be given if a ranking has been selected prior.</p>	Approval	Academia/Research CABs; Farm (Producers) Government /Regulator; Intergovernmental Organisations; IT solutions companies; NGOs	Survey, Workshop, 1:1 Sessions
2.3	<p>Do you agree with Indicator 2.3.3 to not allow the use of acoustic deterrent devices unless the farm can demonstrate that its use does not disturb cetaceans? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree.</p>	Approval	Academia/Research CABs; Farm (Producers)	Survey, Workshop-Survey; 1:1 sessions

<sup>3</sup> Exceptions are limited to occasional mortality incidents, rather than systemic incidents, and as long as the incident does not affect the favourable population status. As an example, a written statement by a veterinarian or the responsible authorities may confirm animals were unlikely to recover or the situation evidently threatened human safety, and a written statement by authorities may confirm legal requirements to euthanise. In all cases, a written statement shall be available confirming that a) injured animals were unlikely to recover, b) animals evidently threatening human safety, or c) legal requirements mandated euthanasiation by a senior manager above the farm manager, which can be issued during or after the incident.



	Free comment-box will be made available as well. Free comments can only be given if a ranking has been selected prior.		Government /Regulator; Intergovernmental Organisations; IT solutions companies; NGOs	
2.3	<p>ASC recognizes that even where effective mitigation measures are implemented, occasional unintentional bird mortalities will occur. Should ASC remove birds as a specified species group in indicator 2.3.2 and consider an allowable metric limit for birds?</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree.</p> <p>Free comment-box will be made available as well. Free comments can only be given if a ranking has been selected prior.</p>	Information	Academia/Research CABs; Farm (Producers) Government /Regulator; Intergovernmental Organisations; NGOs	Survey, Workshop, 1:1

2.4	<p>2.4.1 The UoC shall only stock<sup>4</sup> a non-native species if at least one of the below conditions is met:</p> <p>1) the species has existed in established wild population(s) in the culture area since 2010<sup>5</sup>;</p> <p>2) the species has been widely commercially produced<sup>6</sup> in the culture area before 2010;</p> <p>3) the stock is to a high degree sterile<sup>7</sup> or otherwise unable to establish wild populations;</p> <p>4) the species is cultured in fully-closed recirculating aquaculture systems<sup>8</sup>.</p>	Information	Farms; NGOs; Academia / Research; Government /regulator;	Survey, Workshop-Discussion
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<sup>4</sup> This includes species stocked together with the culture fish for purposes such as parasite control.

<sup>5</sup> The date (2010) refers to the year of release of the first ASC Standard.

<sup>6</sup> Widely commercially produced: see Definition list

<sup>7</sup> A high degree of sterility is achieved by:1) >98% triploidy monosex, 2) germ-cell migration disruption and 3) gene editing (CRISPR).

<sup>8</sup> Fully closed RAS: see Definition List



	<p>Should there be any other conditions where ASC should allow the culture of non-native species? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. + don't know / no opinion If you agree / strongly agree, please indicate which condition(s):*</p>		<p>Intergovernmental organisation ; CAB / Auditor</p>	
2.4	<p>Fully-closed recirculating aquaculture systems: this means the system is land-based and prevents escapes from each stage in the production process, including for example eggs, larvae and alevins, in addition to adult fish. Fully closed means there is no direct pathway to the environment. Animal production must take place inside buildings built to withstand severe local weather conditions (e.g., tropical storms, flooding), and all effluents pass through multi-stage treatment systems including mechanical filtration prior to release.</p> <p>Do you agree with the definition above? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*</p>	information	<p>Farms; NGOs; Academia / Research; Government /regulator; Intergovernmental organisation ; CAB / Auditor</p>	<p>Survey, Workshop-Discussion</p>
2.4	<p>2.4.1 The UoC shall only stock<sup>9</sup> a non-native species if at least one of the below conditions is met: 1) the species has existed in established wild population(s) in the culture area since 2010<sup>10</sup>; 2) the species has been widely commercially produced<sup>11</sup> in the culture area before 2010; 3) the stock is to a high degree sterile<sup>12</sup> or otherwise unable to establish wild populations; 4) the species is cultured in fully-closed recirculating aquaculture systems<sup>13</sup>.</p> <p>Current indicators do not address the special situation where non-native species have already become established or have been commercially farmed prior to 2010. However, continued farming of these non-native species in certain areas may have a remaining high potential to cause continued/new harm:</p> <p>Should ASC add an indicator, requiring that non-native <u>invasive</u> species are only permitted under option 3) or 4) in indicator 2.4.1?</p>	Approval & information	<p>Farms; NGOs; Academia / Research; Government /regulator; Intergovernmental organisation ; CAB / Auditor</p>	<p>Survey, Workshop-Survey</p>

<sup>9</sup> This includes species stocked together with the culture fish for purposes such as parasite control.

<sup>10</sup> The date (2010) refers to the year of release of the first ASC Standard.

<sup>11</sup> Widely commercially produced: see Definition list

<sup>12</sup> A high degree of sterility is achieved by:1) >98% triploidy monosex, 2) germ-cell migration disruption and 3) gene editing (CRISPR).

<sup>13</sup> Fully closed RAS: see Definition List



	<p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. + don't know / no opinion</p> <p>If you agree / strongly agree , what source(s) should be used to classify/define “invasive species”?</p> <p>And</p> <p>What source(s) should be used to classify/define “known to harm”?</p>			
2.4	<p>2.4.1 The UoC shall only stock<sup>14</sup> a non-native species if at least one of the below conditions is met:</p> <p>1) the species has existed in established wild population(s) in the culture area since 2010<sup>15</sup>;</p> <p>2) the species has been widely commercially produced<sup>16</sup> in the culture area before 2010;</p> <p>3) the stock is to a high degree sterile<sup>17</sup> or otherwise unable to establish wild populations;</p> <p>4) the species is cultured in fully-closed recirculating aquaculture systems<sup>18</sup>.</p> <p>Should ASC add a separate indicator with more limited conditions for non-native species which can sexually mature during grow-out?</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. + don't know / no opinion</p> <p>If you agree / strongly agree, which of the conditions 1) to 4) above should apply? (1-4; don't know / no opinion)</p>	Approval & information	Farms; NGOs; Academia / Research; Government /regulator; Intergovernmental organisation ; CAB / Auditor	Survey, Workshop-Survey
2.5	<p>Across the aquaculture industry, practices differ regarding fish counting. Whereas counting, and its associated technique, is advanced in the salmon industry, this might not be comparable in other cultured species (e.g. seabass, seabream, tropical finfish species, seriola/cobia).</p> <p>In addition, the impact of escaped salmon on their wild counterpart population is proven, whereas this is less tangible for other species.</p> <p>Within this context, should ASC set more strict escape limits for specifically salmon, or, set consistent escape limits for all cage-culture species equally?</p>	Approval & Information	General	Survey, Workshop, 1:1, Pilots

<sup>14</sup> This includes species stocked together with the culture fish for purposes such as parasite control.

<sup>15</sup> The date (2010) refers to the year of release of the first ASC Standard.

<sup>16</sup> Widely commercially produced: see Definition list

<sup>17</sup> A high degree of sterility is achieved by:1) >98% triploidy monosex, 2) germ-cell migration disruption and 3) gene editing (CRISPR).

<sup>18</sup> Fully closed RAS: see Definition List



	ANSWER OPTIONS (two options to choose from) + don't know / no opinion: ASC should set stricter limits for salmon only ASC should set consistent escape limits for all cage-culture species equally  + open comment box			
2.5	Unaccounted losses are defined as the total harvest number minus stocked number, known mortalities, and known escapes. Do you agree that not more than 4% of unaccounted fish loss should be permitted per production cycle (4%/cycle)? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. Free comment-box. Free comments can only be given if a ranking has been selected prior.	Approval	General	Survey, Workshop
2.5	Unaccounted losses are defined as the total harvest number minus stocked number, known mortalities, and known escapes. Do you agree that the percentage of unaccounted loss has to be reduced over time as a demonstration of improvement? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. Free comment-box. Free comments can only be given if a ranking has been selected prior.	Approval	General	Survey, Workshop
2.5	How should ASC handle the topic of escapes for culture systems such as ponds in areas of chronic flooding?	Information	Farms, CABs, Academics, Governments	Workshop 1:1
2.5	Do you agree it is realistic to expect all culture systems other than cages to have no mass escape events and no chronic leakage?  ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*	Information	Farms, CABs, Academics	Survey
2.5	2.5.2 <i>Indicator scope: finfish only</i> The UoC shall reduce <sup>19</sup> the number of unaccounted loss over time, by reducing the number of escapes and increasing counting accuracy, so that actual harvest counts result in a maximum of 1% unaccounted stock calculated over a 9-year period.  Do you agree with this 1% unaccounted stock criterion calculated over a 9-year period?	Information	Finfish farms, Finfish CABs, Environmental NGOs, Academics	Survey

<sup>19</sup> A mass mortality event in the previous year/cycle does not count towards improvement in the next year/cycle, as required in this indicator.



	ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree If you disagree / strongly disagree, please indicate why and what you think the percentage should be:*			
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2.6	2.6.2 The UoC shall ensure an acceptable Ecological Quality Status (EQS) of the area surrounding the farm as outlined in Appendix I (Table 2).  Do you agree with the following statement: “The EQS categories are applicable to all benthic habitats suitable for marine aquaculture”? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don’t know / no opinion. If you disagree / strongly disagree, please indicate why and what you think the percentage should be:*	Approval	Academia Regulators Farms with marine cages or suspended mollusc systems	Survey Pilots
2.6	2.6.2 The UoC shall ensure an acceptable Ecological Quality Status (EQS) of the area surrounding the farm as outlined in Appendix I (Table 2).  Do the limits set for the various abiotic and biotic measures in Table 2 of Appendix I reflect the goal to minimise, mitigate or eliminate negative benthic habitat, biodiversity and ecosystem effects from seabed organic enrichment? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree If you disagree / strongly disagree, please indicate why:*	Approval	Environmental NGOs Academia Farms with marine cages or suspended mollusc systems	Survey Workshop
2.6	See Appendix I, Section 1.4 - Timing of sampling Do you have any information or scientific references that ASC can review to support or refine the proposed timing for sampling?	Information	Academia Farms with marine cages or suspended mollusc systems	Survey
2.6	See Appendix I, Section 1.5 - Tiered Sampling Approach Do you agree the number of samples for Tier 1 and Tier 2 are practical? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don’t know / no opinion. If you disagree / strongly disagree, please indicate why:*	Feasibility	Farms with marine cages or suspended mollusc systems	Survey
2.6	Appendix I, Section 1.5 - Tiered Sampling Approach - A. Sampling Protocol – Marine Cage Systems	Approval	Environmental NGOs	Survey Workshop

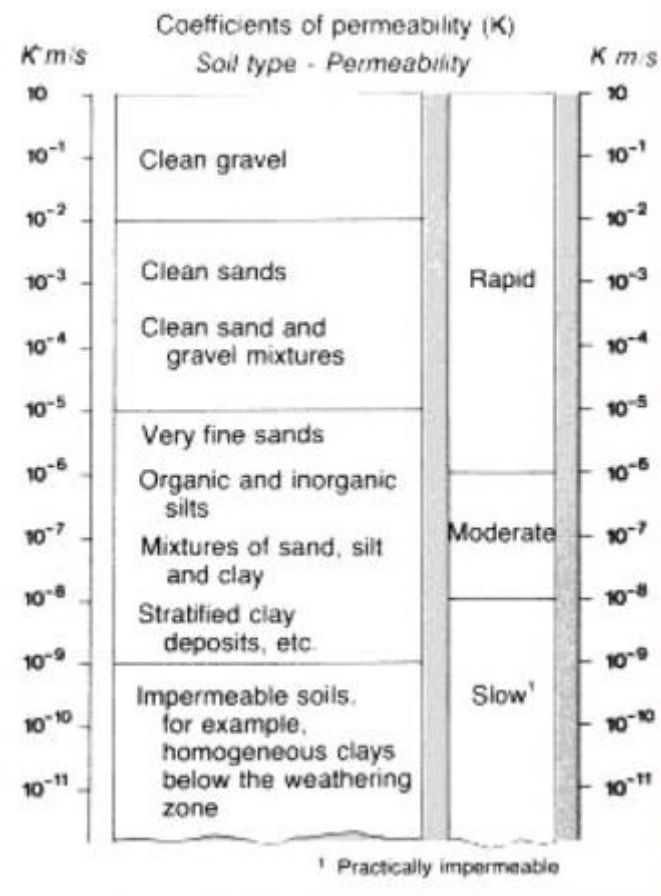


	<p>The distances from the holding structures for the EQS monitoring zones are set at 30, 100, 150 and 500 metres. Do you agree these accurately reflect the spatial distribution of organic waste from the farm? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*</p>		Academia Marine cage farms	
2.6	<p>Appendix I, Section 1.5 - Tiered Sampling Approach - A. Sampling Protocol – Suspended Marine Mollusc Systems. The distances for the EQS monitoring zones are set at 0 to 30 m inside the farm boundary and 10 to 30 m outside the farm boundary. Do you agree these accurately reflect the spatial distribution of organic waste from the farm? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*</p>	Approval	Environmental NGOs Academia Farms with suspended mollusc systems	Survey Workshop
2.6	<p>See Appendix I, Section 1.6 - User-defined monitoring program. Do you agree the requirements for the user-defined specific benthic monitoring program are clear and auditable? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*</p>	Information	CABs Farms with marine cages or suspended mollusc systems	Survey 1:1 Workshop Pilots
2.6	<p>See Appendix I, Section 1.7 - Standard Operating Procedures for the Field Analysis of Abiotic Indicators Employed in Tier 1 and Tier 2. Do you perceive any potential challenges with the use of the Sulfide UV methodology? Yes / No If Yes, please explain:*</p>	Feasibility	Academia Regulators Farms with marine cages or suspended mollusc systems	Survey Pilots
2.6	<p>The Benthic Technical Working Group is recommending an approach similar to the one followed by the proposal for marine systems for freshwater systems that discharge into lakes and reservoirs. The approach incorporates:</p> <ul style="list-style-type: none"> <li>• A tiered sampling and EQS classification;</li> <li>• Direct benthic monitoring;</li> <li>• The use of biotic and abiotic indicators.</li> </ul> <p>Do you have any information or scientific references that ASC can review to further develop the approach for freshwater systems that discharge into lakes and reservoirs?</p>	Information	Academia Farms excluding marine cages or suspended mollusc systems	Survey





2.7	<p>See the blue box for criterion 2.7.</p> <p>Do you have any information or scientific references that ASC can review to further develop the recommendations for systems that discharge into lakes and reservoirs?</p>	Information	Academia; Government /Regulators; Environmental NGOs; Farms that operate in lakes and reservoirs	Survey 1:1
2.7	<p>Concerning the 'Proposal for a simple tool for assessing farm impacts on water quality':</p> <p>Do you have any information or scientific references that ASC can review to further develop the proposed tool?</p>	Information	Academia; Government /Regulators; Environmental NGOs; Farms that operate in lakes and reservoirs	Survey
2.8	<p>Do you agree with ASC defining highly permeable soil as having a K coefficient of <math>10^{-1}</math> m/s - <math>10^{-8}</math> m/s?</p> <p>ANSWER OPTIONS: Yes/No. + don't know / no opinion</p> <p>If no, "Please explain why:"*</p>	Approval	Environmental NGOs, academics, producers, governments, CAB	Survey Workshop



2.8	What methodology should ASC recommend in guidance for producers to determine soil permeability (cost effective, ease of use)	Information	Environmental NGOs, academics, producers, governments, CAB	Workshop
2.8	Do you agree that producers should be allowed to not use liners in naturally saline environments regardless of the permeability of the soil?	Approval	Environmental NGOs,	Workshop Survey



	ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*		academics, producers, governments	
2.8	To reduce plastic waste ASC would like to prohibit the use of plastic liners. Do you agree that this is feasible?  ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, please indicate why:*	Feasibility	Environmental NGOs, academics, producers, governments	Survey Pilots Workshop
2.8	ASC would like to propose prohibiting the discharge of effluents over land since this can contribute to salinisation. Do you agree with this proposal?  ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. If you disagree / strongly disagree, please indicate why:*	Approval	Environmental NGOs, academics, producers, governments	Workshop Survey

2.9	<p>2.9.1 The UoC shall carry out an assessment, to identify and document the following:</p> <ul style="list-style-type: none"> <li>• locations where biosolids accumulate and are removed</li> <li>• potential contamination of biosolids through salinity, disease, drug residues, residues of other hazardous waste<sup>1</sup></li> <li>• when feeding is used: estimate concentration of key nutrients (Nitrogen, Phosphorus)</li> <li>• options for on-site containment of biosolids</li> <li>• anticipation of recurring extreme weather events which could impact on on-site containment measures</li> <li>• evaluate possibilities to prioritise re-use over disposal</li> <li>• any needs to dispose of biosolids off site</li> </ul> <p>Do you agree that it is feasible for the UoC to estimate the key nutrient concentration (Nitrogen, Phosphorus) in the biosolids?</p> <p>ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you agree / strongly agree, please indicate why:*</p>	Feasibility	Farms CABs	Survey Pilots
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2.9	<p>2.9.2 When biosolids are re-used<sup>20</sup>, the UoC shall only re-use uncontaminated biosolids (see 2.9.1), and only for the following purposes:</p> <ul style="list-style-type: none"> <li>• use as fertilizers in agriculture</li> <li>• maintenance and building of dykes</li> <li>• maintenance of roads or infrastructure</li> <li>• biogas</li> </ul> <p>Please provide any other responsible re-uses of uncontaminated biosolids which you think should be added to the list:</p>	Info	Farm Academics	Survey
2.9	What methods do you use for responsible re-use of your biosolids?	Info	Farm	Survey
2.9	Please provide any information/data/research you may possess on potential risks associated with antibiotic resistances building up due to re-use of biosolids	Info	Academics	Workshop, Survey
2.9	Do you know of an easy way producers can estimate key nutrients (Nitrogen and Phosphorus)?	Info	Academics	Workshop
2.9	Does ASC need to add other key nutrients (in addition to Nitrogen and Phosphorus)? Yes/No + don't know / no opinion If yes, please specify which nutrients you believe should be added:*	Info	Academics	Survey Workshop

2.10	<ol style="list-style-type: none"> <li>1. Does your production system require the addition of salt? (Y/N)</li> <li>2. What is the annual/monthly/daily? change in salinity? (add scale options)</li> <li>3. Do you utilize desalination systems prior to discharge? (Y/N)</li> </ol>	Info	Producers	Pilots
2.10	<p>Do you agree it is feasible for producers to get minimum vital flow information for their water source? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree, what information would producers be able to provide that show they use water responsibly?*</p>	Feasibility / Info	Producers, Government s, CABs, Environmental NGOs, Academics	Survey

<sup>20</sup> this applies when biosolids are removed from e.g., culture systems, canals, treatment systems.



2.10	How often do measurements need to be conducted to determine that water is used responsibly (e.g., weekly, monthly, quarterly, annually)? Comment box + don't know / no opinion.	Information	Governments, Academics	Survey
2.10	Do you think there is value in mapping all users of water in an area to determine relative use by the UoC? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree If you agree / strongly agree, please indicate why:*	Agreement	Governments, Environmental NGOs, Academics	Workshop
2.10	Do you agree that measures to reduce water use and water wastage are necessary in areas where water is abundant? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree	Information	General	Survey

2.11	Are there particular barriers to gathering information on the types and volumes of energy used (e.g. litres of gasoline or kJ of electrical energy purchased from a supplier), for producers that have not previously needed to calculate and report energy use and/or GHG emissions?  Yes/No + don't know / no opinion If Yes, please specify which barriers:*	Info Feasibility	Farms, CABs	Survey Workshop 1:1
2.11	2.11.2 The UoC shall annually calculate the quantity of GHG emissions produced, in kg CO <sub>2</sub> -eq per tonne of farm-gate production, following the method outlined in Annex 2, including total emissions and emissions from each of: a) on-farm energy consumption, b) feed, and c) on-farm consumption of other inputs.  Are there particular sources of GHG emissions relevant to aquaculture production that the combined considerations outlined above fail to address?(please note that land use change is covered elsewhere in the Farm and Feed Standards)  ANSWER OPTIONS: Yes/No + don't know / no opinion If yes: please list those that you believe should be incorporated into the criterion's calculation and reporting requirements	Info and agreement	NGOs, Academia	Survey Workshop 1:1
2.11	2.11.3	Agreement	General	Survey Workshop 1:1



	<p>a) The UoC shall, where 2.11.1 and 2.11.2 indicate energy related values higher than the thresholds below in i. and ii., develop and implement an Energy Efficiency Management Plan (EEMP), including the improvement measures in b), c) and d):</p> <p>i. 1,300 MJ/t energy consumed per tonne of, farm-gate production, and  ii. 100 kg CO<sub>2</sub>-eq per tonne of farm-gate production from on-farm energy use.</p> <p>b) The UoC shall, as part of the EEMP, outline provisions to improve the efficiency of farm-gate production per unit of energy used and GHG emissions produced, in order to work towards 2.11.3 a).  c) The UoC shall, as part of the EEMP, outline provisions to reduce the use of energy from non-renewable sources, in order to work towards 2.11.3 a).  d) The UoC shall, as part of the EEMP, outline provisions to derive an increased proportion of energy from non-fossil fuel sources, in order to work towards 2.11.3 a).</p> <ul style="list-style-type: none"> <li>Are there particular items or requirements that should be included to maximise the effectiveness of an EEMP?</li> </ul> <p>ANSWER OPTIONS: Yes/No + don't know / no opinion  If yes: please list those that you believe should be included</p>	Information		
2.11	<p>2.11.3 a) The UoC shall, where 2.11.1 and 2.11.2 indicate energy related values higher than the thresholds below in i. and ii., develop and implement an Energy Efficiency Management Plan (EEMP), including the improvement measures in b), c) and d):</p> <p>i. 1,300 MJ/t energy consumed per tonne of <sup>21</sup>, farm-gate production, and  ii. 100 kg CO<sub>2</sub>-eq per tonne of <sup>22</sup>, farm-gate production from on-farm energy use.</p> <p>2. Do you have suggestions for another basis for calculating energy performance that would be more adequate and/or more effective?</p> <p>ANSWER OPTIONS: Yes/No  If yes: please provide your suggestions</p>	Feasibility	General CABs Scientists	Pilot Survey
2.12	<p>What challenges, if any, do you expect to encounter when implementing the requirement of tagging or marking aquaculture gear? Please explain:</p>	Feasibility	Farms	Pilots Workshops

<sup>21</sup> Threshold for energy use is based on the median on-farm energy consumption per kg of live weight chicken as reported in 8 published life cycle assessments of conventional chicken production.

<sup>22</sup> GHG threshold represents the equivalent quantity of energy multiplied by a direct GHG intensity factor for diesel (0.074 kg CO<sub>2</sub>-eq/MJ).



2.12	What challenges, if any, do you expect to encounter when implementing the use of plastic retention devices at the effluent or farms discharge point? Please explain.	Feasibility	Farms	Pilots Workshops
2.12	Is it reasonable to require that farms contain hazardous materials to the extent that there would be no runoff during extreme weather events?	Feasibility	Farms	Pilots Workshops
2.12	2.12.5 The UoC shall hold effluents for at least 48h, or as per product specification (whichever is greater), after culture animals have been treated with hormones.  Do you agree a 48-hour wait is the most appropriate process to ensure sufficient breakdown of active ingredients to avoid significant negative impact? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If you disagree / strongly disagree: What other parameters or processes should be included?*	Info/Approval	Farms / Academia	Pilots Workshops Survey
2.12	2.12.6: The UoC shall only use net cleaning facilities which treat effluents, if nets are cleaned on land; effluent treatment includes the capturing of copper if copper treated nets are used.  Should any biocides other than copper be included? ANSWER OPTIONS: Yes/No + don't know / no opinion If yes: please list those that you believe should be included	Info/Approval	Farms / Academia	Survey Pilots Workshops 1:1
2.12	2.12.8: The UoC shall not treat nets / other aquaculture gear / infrastructure with copper, or clean <sup>23</sup> copper-treated nets <sup>24</sup> / other aquaculture gear / infrastructure, in situ in the environment.  Are there any situations in which it is not feasible to comply with this indicator? (e.g. spraying of infrastructure in cage structures/platforms) ANSWER OPTIONS: Yes/No + don't know / no opinion If yes: please list those situations	Feasibility	Farms / Academia CABs	Pilots Workshops 1:1

<sup>23</sup> Light cleaning of nets is allowed. Intent of the standard is that, for example, the high-pressure underwater washers could not be used on copper treated nets because of the risk of copper flaking off during this type of heavy or more thorough cleaning.

<sup>24</sup> Under the SAD, "copper-treated net" is defined as a net that has been treated with any copper-containing substance (such as a copper-based antifoulant) during the previous 18 months, or has not undergone thorough cleaning at a land-based facility since the last treatment. Farms that use nets that have, at some point prior in their lifespan, been treated with copper may still consider nets as untreated so long as sufficient time and cleaning has elapsed as in this definition. This will allow farms to move away from use of copper without immediately having to purchase all new nets.



2.12	2.12.19 The UoC shall not use single use plastics (SUPs) <sup>25</sup> , unless sustainable alternatives are not available or affordable <sup>26</sup> . Does the requirement that restricts the use of single use plastics impose a challenge according to your own circumstances. Please explain.	Feasibility	Farms	Survey; Pilots; Workshops
2.12	2.12.20: The UoC shall install, control and record plastic retention devices at the effluent or discharge point, to prevent contributing to marine litter.  What kind of plastic retention devices do you know that succeed in preventing marine litter?	Information	Farms / Academia	Workshops Pilots Survey 1:1
2.12	2.12.22: The UoC shall dispose of waste <sup>27</sup> responsibly, by using one of the following methods: i. Non-hazardous waste - disposal by incineration <sup>28</sup> (with energy recovery) - disposal by incineration (without energy recovery) - disposal by landfilling <sup>29</sup> ii. Chemical and hazardous waste - disposal of chemical and hazardous waste by professional contractor, after treatment <sup>30</sup> and using the methods listed above  What other means of disposing, apart from disposal by incineration and disposal by landfilling would you consider responsible and why?	Information	Farms Academia CABs Environmental NGOs	Survey Workshop Pilot 1:1

2.13	How many feed suppliers do you source from? From those, how many produce feed which meets current ASC farm standard requirements?	Info	Certified Farms	Survey Workshop 1:1 Pilots
2.13	How likely do you think it is that some farms may not be able to purchase ASC Feed as per the new Feed Standard? Link Feed Standard to: <a href="https://www.asc-aqua.org/what-we-do/our-standards/feed-standard/">https://www.asc-aqua.org/what-we-do/our-standards/feed-standard/</a> ANSWER OPTIONS: very likely – likely – neither likely nor unlikely – unlikely – very unlikely + don't know / no opinion.	Info	Farms and feedmills	Survey Workshop 1:1 Pilots

<sup>25</sup> This shall include cotton bud sticks, cutlery, plates, straws, stirrers, and sticks for balloons, and should include cups, food and beverage containers made of expanded polystyrene, and on all products made of oxo-degradable plastic.

<sup>26</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32019L0904&from=EN>

<sup>27</sup> Including biosolids, daily mortality removals and mass mortalities

<sup>28</sup> Incineration: see Definition List.

<sup>29</sup> Landfilling: see Definition List.

<sup>30</sup> Chemical and Hazardous waste may need prior/additional treatment, see 2.12.2 and 2.12.8.





2.13	<p>Indicator 2.13.2: The UoC shall only feed seaweed as a direct feed source which has been wild harvested from a regulated, well-managed resource or farmed under an ASC recognised certification scheme.</p> <p>How likely do you think it is that some farms may not be able to source seaweed which meets this requirement?</p> <p>ANSWER OPTIONS: very likely – likely – neither likely nor unlikely – unlikely – very unlikely + don't know / no opinion.</p>	Info	Academia/Research CAB Environmental NGO Farm (Producer) Feed mill	Survey
2.13	<p>2.13.6 The UoC shall not feed wet feedstuffs<sup>31</sup> or moist pellets<sup>32</sup>, nor uncooked or unprocessed fish<sup>33</sup> to ASC certified production.</p> <p>Are you aware of any species which rely on feeding wet feedstuffs or moist pellets (2.13.6)? Yes / No + don't know / no opinion</p>	Info	Farms and feedmills, academics, environmental NGOs, CABs	Survey

2.14	<p><i>Indicator scope: finfish only</i></p> <p>Indicator 2.14.1: The UoC shall vaccinate finfish for all regionally-relevant diseases for which an effective vaccine exists.</p> <p>It is feasible to vaccinate finfish for all regionally-relevant diseases for which an effective vaccine exists. <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion.</p> <p>If disagree / strongly disagree, please explain why:*</p>	Feasibility	Academia/Research; Finfish Farms (Producers); Veterinarians; Environmental NGOs	Workshop Pilots 1:1
2.14	<p><i>Indicator scope: finfish only</i></p>	Approval	Academia/Research; Finfish	Survey 1:1

<sup>31</sup> **Wet feed:** See Definition List.

<sup>32</sup> **Moist pellets:** See Definition List.

<sup>33</sup> **Uncooked or unprocessed fish:** See Definition List.



	<p>Indicator 2.14.1: The UoC shall vaccinate finfish for all regionally-relevant diseases for which an effective vaccine exists</p> <p>Do you think there should be an exception for smallholders/extensive farming UoC's to comply with 2.14.1? ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree If you agree / strongly agree, please indicate why:*</p>		<p>Farms (Producers); Intergov. Orgs; Veterinarians; Environmental NGOs</p>	
2.14	<p><i>Indicator scope: salmon only</i></p> <p>Indicator 2.14.2: The UoC shall, when stocking an individual site, only stock single year class fish.</p> <p>Which species other than salmon should this indicator apply to?</p>	Information	<p>Producers, CABs, Environmental NGOs</p>	Survey
2.14	<p><i>Indicator scope: finfish only</i></p> <p>Indicator 2.14.3: The UoC shall regularly remove mortalities and moribund animals and dispose of mortalities responsibly; responsible disposal mechanisms are listed in 2.12 Material use, Waste and Pollution.</p> <p>Do you agree it is feasible to regularly remove mortalities and moribund animals and dispose of mortalities responsibly. <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion If disagree / strongly disagree, please explain why:*</p>	Feasibility	<p>Academia/Research; Finfish Farms (Producers); Intergov. Orgs; Veterinarians; Environmental NGOs</p>	Workshop; 1:1 Pilots
2.14	<p><i>Indicator scope: finfish only</i></p> <p>Indicator 2.14.3: The UoC shall regularly remove mortalities and moribund animals and dispose of mortalities responsibly; responsible disposal mechanisms are listed in 2.12 Material use, Waste and Pollution.</p> <p>For which species other than finfish would this indicator be relevant?</p>	Information	<p>Academia/Research; Farms (Producers); Intergov. Orgs; Veterinarians; Environmental NGOs</p>	Survey
2.14	<p><i>Indicator scope: finfish only</i></p> <p>Indicator 2.14.3: The UoC shall regularly remove mortalities and moribund animals and dispose of mortalities responsibly; responsible disposal mechanisms are listed in 2.12 Material use, Waste and Pollution.</p>	Information	<p>Academia/Research; Farms (Producers);</p>	Survey



	<p>Are there any culture systems/life stages, where removal of mortalities is not feasible/not necessary?          Yes / No + don't know / no opinion          If yes, please explain:</p>		Intergov. Orgs; Veterinarians	
2.14	<p>Indicator 2.14.4: The UoC shall adhere to species-specific limits on mortality rates (Annex 1).</p> <p>Do you think that extensive production should be fully excluded from this indicator (regarding feasibility)?          ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree</p> <p>Do you think there should be moderately reduced requirements for extensive producers?          ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree</p>	Approval	Academia/Research; Farms (Producers); Intergov. Orgs; Veterinarians; Environmental NGOs	Survey Pilots
2.14	<p>Indicator 2.14.12: The UoC shall maintain prescriptions for each application of therapeutants<sup>34</sup>, including the following minimum information:</p> <ul style="list-style-type: none"> <li>– diagnosis</li> <li>– etiology</li> <li>– purpose of use</li> <li>– product name, active ingredient and species to be treated</li> <li>– life stage of species to be vaccinated/treated</li> <li>– dose</li> <li>– duration or repetition of vaccination</li> <li>– administration method</li> <li>– minimum withdraw period</li> <li>– categorization of active ingredient according to the WHO List of Critically Important Antimicrobials for Human Medicine</li> <li>– antimicrobial susceptibility tests results, either prior or as post-treatment, as confirmatory alternatives strategies explored to the prescribed antimicrobial treatment.</li> </ul> <p>Is there any other minimum information required for the therapeutants prescriptions not already listed in the proposed indicator? Please clarify.</p>	Approval	Academia/Research; Farms (Producers); Intergov. Orgs; Veterinarians; Environmental NGOs	Survey Pilots

<sup>34</sup> This includes applications of antibiotics, parasiticides, antifungal, antiviral, hormones, anaesthetics, and vaccines.



2.15	<p>Indicator 2.15.4 - <i>Indicator scope: UoCs using parasiticides</i></p> <p>The UoC shall monitor parasiticide residue levels annually in the benthic sediment directly outside the AZE<sup>35</sup>.</p> <p>Do you agree it is feasible to monitor parasiticide residue levels in the benthic sediment?  <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Feasibility	Farms Academia	Survey Pilots
2.15	<p>Should ASC consider all types of parasiticides (e.g. including oral and bath)?</p> <p>Answer options: Yes / No + don't know / no opinion</p> <p>If No, please explain why:*</p>	Information	Academia/Research; Farms (Producers); Veterinarians; Environmental NGOs	Survey
2.15	<p>Indicator 2.15.9 - The UoC shall apply treatment rotation<sup>36 37</sup>, providing that the farm has &gt;1 effective parasiticide available, with every third treatment.</p> <p>Do you agree it is feasible to apply treatment rotation, providing that the farm has &gt;1 effective parasiticide available, with every third treatment?  <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Feasibility	Academia/Research; Farms (Producers); Veterinarians; Environmental NGOs	Survey Pilots
2.15-x	<p><b>C. Requirements on sampling protocols</b></p> <p>1) <u>Frequency:</u> Weekly sampling during the sensitive period. Monthly sampling the rest of the year.</p> <p>2) <u>Number of cages:</u> At least 50% of cages shall be sampled over a 2-week period, with the entire farm sampled over at least a 6-week period.</p>	Information	Salmon farms; Government	Survey Pilots Workshop 1:1

<sup>35</sup> ASC guidance on the actual collection/sampling and analysis regarding parasiticide residue levels is pending. Until this guidance is available, compliance with the indicator is not required and auditors shall treat this indicator as non-applicable in the Audit Report. The guidance, when published, will establish the effective implementation date for this indicator (see also QA0111).

<sup>36</sup> This is in addition to, and independent of, the susceptibility test outcome in 2.15.6 or the bio-assay analysis outcome in 2.15.8.

<sup>37</sup> In the context of this criterion, treatment rotation means using an active ingredient belonging to a different family of parasiticides.



	<p>3) <u>Number of fish per cage</u>: A minimum of 10 fish per cage should be sampled.</p> <p>4) <u>Sea lice stage</u>: At a minimum provide data on mobiles<sup>38</sup> and adult females</p> <p>Do you know of any jurisdictions or types of farms for which the implementation of the proposed requirement on sampling protocols will be challenging?          Answer options: Yes / No          If Yes, please explain the circumstances and the challenges:</p>		Academia/Research; Veterinarians; Environmental NGOs	
2.15-x	<p><u>Fish welfare (exemption from sampling)</u>: The veterinarian or fish health professional may exempt fish from being sampled during a certain period of time within the sensitive period. The reason for the exemption shall be documented. Grounds for exemption may include:</p> <ul style="list-style-type: none"> <li>• Immediately after smolting and stocking.</li> <li>• Undergoing a disease event and/or being treated (including treatment for sea lice). In case the reason for the exemption is related to fish treatment, the maximum duration for the exemption shall be 2 weeks.</li> <li>• During specific environmental events (e.g.: water temperature [i.e., below 4°C], low oxygen, algal bloom, jellyfish event).</li> </ul> <p>If you would like to propose other potential reasons for exemption from sampling, please list them here:</p>	Information	Academia/Research; Salmon Farms; Veterinarians; Environmental NGOs	Survey Pilots
2.15-x	<p>Do you have additional information or scientific references that ASC can review to support or refine the recommendation on setting a regionally relevant lice level (in the context that, as starting place, ASC will use the lowest action/trigger level in jurisdictions today).</p>	Information	Government ; Academia; Salmon producers; Environmental NGOs	Survey 1:1
2.15-x	<p>2.15.20 The UoC shall maintain on-farm sea lice levels during the sensitive period below the thresholds, or in case of exceeding those thresholds reduce levels below the thresholds within [TBD] days upon exceedance, as outlined in Appendix XX “Sea Lice Thresholds for Sensitive Periods”.</p> <p>What timeline would you propose to allow, for bringing the sea lice level below the maximum threshold?          [Text box] + don't know / no opinion</p>	Feasibility	Salmon producers; Environmental NGOs	Pilots Survey
2.15-x	<p>Appendix XX includes:</p>	Information	Salmon producers;	Pilots Survey

<sup>38</sup> Pre-adult and adult sea lice males.



	<p>The veterinarian or fish health professional may exempt fish from being treated and, therefore, the ability to reduce the on-farm sea lice levels below the threshold within [TBD] days upon exceedance, during a certain period of time within the sensitive period if local regulations permit. The reason for the exemption shall be documented. Grounds for exemption may include: specific environmental events (extreme weather event, water temperature [i.e. below 4°C], low oxygen, algal bloom, jellyfish event), unforeseen increases in on-farm lice levels, documented logistical roadblocks or delays for implementing treatment.</p> <p>If you would like to propose any additional special circumstances under which the allowed timeline for exceeding the maximum threshold should be extended, please list them here:</p>		Environmental NGOs	
2.16	<p>ASC proposes to not allow Critically Important Antibiotics on ASC labelled products. Do you agree with this?            Answer options: strongly agree – agree – neutral – disagree – strongly disagree            Please indicate why:*</p>	Approval	General	Survey Workshop 1:1
2.16	<p>ASC proposes to require an overtime reduction in the total antibiotic load. This would be a new requirement for all ASC certified farms. Do you agree with this requirement?            Answer options: strongly agree – agree – neutral – disagree – strongly disagree            Please indicate why:*</p>	Approval	General	Survey Workshop 1:1
2.17	<p>ASC aims to address the impact of pre-Grow Out sites (e.g. hatcheries) using the same indicators as for Grow Out sites. Do you agree this aim is feasible?  <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion            If disagree / strongly disagree, please explain why:*</p>	Feasibility	Producers, CABs, Environmental NGOs	Survey Workshop 1:1 Pilots
2.17	<p>Does the proposal close current “gaps” in standard application, ensuring all elements of production are considered?</p>	Approval	Environmental NGOs	Workshop 1:1
2.17	<p>Which option do you prefer to verify compliance of the pre-Grow Out sites?</p> <ul style="list-style-type: none"> <li>Option 1: on-site inspections of the pre-Grow Out sites by a qualified internal auditor from the UoC, using the ASC inspection template, reviewed by the CAB during the UoC audit with spot-checks as necessary by third-party auditors of intermediate sites in salmon production</li> <li>Option 2: on-site audits by third party CAB auditors or by UoC auditors with equivalent qualifications</li> </ul> <p>Other - please specify:</p>	Approval	Producers, CABs, Environmental NGOs	Survey Workshop 1:1 Pilots



2.17	<p>This proposal separates production into “pre-growout” and “growout”, with the growout phase comprising the site of audit, or the UoA. For finfish, the “pre-growout” phase will include any sites used prior to the harvest site (e.g. hatchery site, intermediate site or holding site). Shrimp will include any production units holding shrimp from PL25 onwards. Abalone and bivalve will include any sites from the point of translocation onwards. Do you agree these definitions adequately cover the sites used and potential impacts as intended?</p> <p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don’t know / no opinion</p> <p>If disagree / strongly disagree, please explain why:* Please outline any other considerations you believe are required (e.g. applicability for smaller sites).</p>	Approval	Producers, CABs, Environmental NGOs, Academics	Survey Workshop 1:1 Pilots
2.17	<p>ASC suggests that the requirement to use ASC compliant feed from ASC certified feed mills applies from first feeding with pellets onwards. In other words, when no feed is used, live feed is used, crumble/granulates/micro-pellets &lt;1.5mm or seaweed is used, the requirement to use ASC compliant feed does not apply. Is this a feasible balance between having robust feed requirements for the far majority of feed quantity but allowing some flexibility for very early stage feeding for which there is much less flexibility/options of sourcing?</p>	Feasibility	Producers, Feed mills	Workshop Pilots
3.1	<p>Indicators 3.1.5 – 3.1.8 specify requirements for medical testing. Could these indicators give license to a UoC to conduct medical testing, if they hadn’t considered it previously? ANSWER OPTIONS: Yes/No Please explain how:</p>	Approval	CABs	Survey
3.1	<p>Indicator 3.1.5 During the recruitment process, the UoC, or if applicable the agency(ies) involved in recruitment shall not require medical tests, unless required for the function of the job.</p> <p>Is there any reason why medical testing should be used for recruitment? ANSWER OPTIONS: Yes/No</p>	Approval	General	Survey
3.2	<p>The Standard does not currently provide a timeline for remediation apart from the 90-day timeline required for closure of a corrective action. The Standard should include a separate timeline for remediation for forced labour.</p>	Approval	Social NGO, academics	Survey



	ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If agree / strongly agree, please explain why and what you believe the timeline should be:*			
3.2	Indicator 3.2.1 is classified as “critical indicator”. This means that any non-compliance on this indicator would: a) Trigger a critical non-compliance, which is an appropriate measure given that the severity of the issue addressed in the indicator; b) Trigger the subsequent remediation indicator (3.2.2).  Do you agree with the classification of indicator 3.2.1 as “critical indicator”. ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree. If strongly disagree / disagree, please explain why:*	Approval	General	Survey Workshop 1:1
3.3	Indicator 3.3.5: The UoC may employ children aged 13 and 14 years old, to conduct light work only, but shall make sure that: - The child receives appropriate training prior to work; - The child receives appropriate supervision; - It does not jeopardise schooling.  This indicator is consistent with ILO standards and the prohibition against child labour. ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion. If disagree / strongly disagree, please explain why:*	Approval	Social NGO, academics	Survey
3.3	The ILO (and some countries) permit children aged 13 and 14 to conduct light work. Should the ASC standard permit children of this age to be employed in light work on the farms, or should this requirement be restricted to work on family farms only?  Option 1. The ASC standard should permit children of this age to be employed in light work on the farms Option 2. The ASC standard should only permit children of this age to work at family farms Other - please specify  (Note, for workshop: are we driving them away from school, or are we driving them towards a system of regulation and protection?)	Approval	Producers, CABs, Retail/Brands, Social NGOs, Academics	Survey Workshop 1:1
3.3	Indicator 3.3.1) is classified as “critical indicator”. This means that any non-compliance on this indicator would:	Approval	General	Survey Workshop?





	<p>a) Trigger a critical non-compliance, which is an appropriate measure given the severity of the issue addressed in the indicator;  b) Trigger the subsequent remediation indicator (3.3.2).</p> <p>Do you agree with the classification of indicator 3.3.2 as “critical indicator”.  ANSWER OPTIONS: strongly agree – agree – neutral – disagree – strongly disagree.  If strongly disagree / disagree, please explain why:*</p>			1:1
3.5	<p>The Standard requires that no medical tests (that are not mandatory by the regulatory labour agency should be carried out as part of the recruitment process. Are there cases or situations where this would need to take place?  <u>Answer options</u> Yes /No</p> <p>If yes, what would these situations be?*</p>	Information	Producers	Survey
3.5	<p>Indicator 3.5.8 - Where not provided by a Regulatory agency State/National social security/health system, the UoC shall provide and pay for insurance<sup>39</sup> for all employees for work-related accidents or injuries; this includes as a minimum the cost for transport and medical treatment/medication needed to treat the accident or injury, the cost for transport and medical treatment/medication needed for recovery, compensation for lost working hours, as well as the cost for any required repatriation in case of migrant workers.</p> <p>Do you agree indicator 3.5.8 (on insurance) is financially feasible for farms?  <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Feasibility	Producers (both Large and SMEs), Social NGOs	Survey Workshop 1:1
3.5	<p>Indicator 3.5.10 - The UoC shall provide access to adequate and clean sanitary facilities, with adequate privacy, which includes separation by gender if required.</p> <p>Should ‘adequate and clean sanitary facilities’ be more clearly defined? (e.g., include correct and safe disposal of waste or running water)  Yes/No  If yes, please provide suggestions for what this definition should include:*</p>	Approval	Producers (both Large and SMEs), Retail/Brands, Social NGOs	Survey Workshop 1:1

<sup>39</sup> Where no suitable insurance is available, the UoC may have a system to cover these costs directly.



<p>3.7</p>	<p>Indicator 3.7.1 - The UoC shall ensure that all employees have received, understood and agreed upon, written and understandable information about their employment terms and conditions before starting employment and where applicable prior to migration. This information shall include, at a minimum:</p> <ul style="list-style-type: none"> <li>• a description of the role and any responsibilities,</li> <li>• the type of contract (e.g. permanent, fixed-term, contractor),</li> <li>• working hours, including allowance for breaks,</li> <li>• paid annual leave and allowance for days off on public holidays,</li> <li>• sick leave,</li> <li>• wages,</li> <li>• any agreed wage deductions (e.g. accommodation, meals),</li> <li>• compensation for overtime,</li> <li>• social benefits (e.g. insurances),</li> <li>• termination terms and conditions; notice period,</li> <li>• access to relevant human rights and labour-related policies</li> <li>• access to information on labour rights as per 1.1.3.</li> </ul> <p>It is feasible for migrant workers to receive written and understandable information about their employment terms and conditions prior to migration.  <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	<p>Feasibility</p>	<p>Producers (both Large and SMEs), Social NGOs, Academics</p>	<p>Survey Workshop 1:1</p>
<p>3.7</p>	<p>Definition of Labour-only contracting arrangements: The practice of hiring employees without establishing a formal employment relationship for the purpose of avoiding payment of regular wages or the provision of legally required benefits, such as health and safety protections.</p> <p>Do you think it is always feasible to restrict the use of labour-only contracting?  <u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	<p>Feasibility</p>	<p>Producers (both Large and SMEs), Social NGOs, Academics</p>	<p>Survey Workshop 1:1</p>
<p>3.7</p>	<p>Do you think there are contexts in which it is appropriate to allow sub-contracting employees to avoid labour liabilities?  Do you think it is always feasible to restrict the use of labour-only contracting?</p>	<p>Approval / information</p>	<p>General</p>	<p>Survey Workshop 1:1</p>



	<p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If agree / strongly agree, please specify which contexts you meant:*</p>			
3.9	<p>Indicator 3.9.1 - The UoC shall keep records of the hours worked by every employee. These records shall be validated / verified by the employees.</p> <p>Is it necessary that employees validate / verify records of hours worked, or is the record itself sufficient?</p> <p><u>Option 1:</u> The employee must validate or verify  <u>Option 2:</u> The record suffices  <u>Option 3:</u> Don't know / no opinion</p> <p>Please explain why</p>	Approval / information	Producers (both Large and SMEs), Social NGOs, Academics	Survey Workshop 1:1
3.9	<p>Indicator 3.9.3 - The UoC shall ensure that overtime hours are voluntary, occur only under exceptional circumstances and are not requested regularly.</p> <p>Overtime should be requested of employees only under 'exceptional circumstances' and is not appropriate under normal circumstances.</p> <p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Approval	Producers (both Large and SMEs), Social NGOs, Academics	Survey Workshop 1:1
3.12	<p>Annex 5, Table 1, Grievance Mechanism Requirements no. 3 - All grievances shall be addressed within a 90-day timeframe of submission.</p> <p>Do you agree 90 days is a feasible timeframe for remediation?</p> <p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Feasibility	Producers (both Large and SMEs), Social NGOs, Academics	Survey Workshop 1:1



3.13	<p>In a previous draft of this Standard, there were two criteria on this subject, one on Communities and one on Indigenous and tribal peoples. In order to avoid repetition in the Standard, this version has just one Criterion on Community Engagement, which includes two indicators that are specifically focused on Indigenous and tribal peoples, although they are named in each indicator.</p> <p>Do you agree that having just one Criterion for communities, which includes both the local communities and Indigenous and tribal peoples in this Criterion is sufficient and appropriate?</p> <p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree</p> <p>If disagree / strongly disagree, please explain why:*</p>	Approval	Social NGOs, Academics	Survey
3.13	<p>Indicator 3.13.4 - The UoC shall be able to demonstrate the right to use the land and water. Where there is a transfer of ownership or usage of land from local people, Indigenous and tribal peoples or other stakeholders to the UoC, such transfer shall be carried out through consultations with these populations.</p> <p>ASC has not yet included rigorous indicators and process around Free, Prior and Informed Consent (FPIC) in the standard. Do you think indicator 3.13.4 is adequate, including guidance that notes that best practice is to use an FPIC process?</p> <p><u>Answer options:</u> strongly agree – agree – neutral – disagree – strongly disagree + don't know / no opinion</p> <p>If disagree / strongly disagree, please explain why:*</p>	Approval	Producers (both Large and SMEs), Social NGOs, Academics	Survey Workshop 1:1

RMF	<p>Do you think the concept of risk management as laid out in the Risk Management Framework (RMF) is in line with scientific advice?</p> <p><u>ANSWER OPTIONS:</u> strongly agree – agree – neutral – disagree – strongly disagree</p> <p>If disagree / strongly disagree, please explain why:*</p>	Approval / Information	Academics	Survey
RMF	<p>Please indicate any relevant scientific advice we should be aware of:</p>	Information	Academics	Survey
RMF	<p>Do you think the concept of risk management as laid out in the Risk Management Framework (RMF) is in line with best practice in risk management?</p>	Approval	General	Survey Workshop



	<u>ANSWER OPTIONS:</u> strongly agree – agree – neutral – disagree – strongly disagree If disagree / strongly disagree, please explain why:*			
RMF	Which potential unintended negative consequences of using this tool do you foresee, if any?	Information	General	Survey

*Final questions*

1. Farm Standard Scope – any comments?
2. The proposed standard encompasses all relevant aquaculture sustainability topics. Scale: 1 – 5 (strongly disagree – strongly agree)
  - a. If disagree / strongly disagree: what topic do you think is missing?
  - b. Why do you think this topic should be added?
3. Annex 1 Species performance levels – Do you have any comments?
4. Annex 2 Data recording and submissions Concept text – Do you have any comments?
5. Annex 6 List of Acronyms, Definitions and Verbal Forms used – Do you find that any definitions are unclear or missing? Yes/No; If yes, please specify:
6. The proposed standard overall is understandable to me. Scale: 1 – 5 (strongly disagree – strongly agree)
7. Are there any other general comments on the proposed standard that you were unable to insert in previous sections?
8. The proposed Farm Standard has my support. Scale: 1 – 5 (strongly disagree – strongly agree)
9. Do you want to stay informed with our latest programme updates? Subscribe to our newsletters:
  - a. ASC Global newsletter
  - b. Global certification update
  - c. ASC France newsletter
  - d. ASC DACH newsletter
  - e. ASC Japan newsletter
  - f. ASC US newsletter



- g. ASC Australia newsletter
  - h. CABs newsletter
10. *For producers:* I would like to volunteer to pilot the Farm Standard in the period September 2022 – March 2023.