

ASC RAS Module – Targeted Consultation Feedback Summary

Summary

The Scope of the RAS module underwent significant change from the initial definition proposed prior to public consultation to the definition given final approval by the Board in March 2021. Changes were made based on feedback during the consultation period, moving from specific numerical requirements to a broad statement on systems recirculating water. During preparation for release, the ASC's Market Development Team raised concerns regarding the wide range of systems that the new definition would cover, potentially including extensive systems. To redefine a scope which adequately covered the systems intended, expert feedback was sought and an initial suggestion was developed and presented to a total of 39 experts (including all stakeholders that commented on the public consultation in 2020) for a targeted consultation. Based on the received feedback and internal discussion, the following scope of the RAS Module was developed:

Intensive tank and raceway systems with high rates of recirculation, biological filtration, and other treatment systems

Feedback received

A definition was developed internally with the feedback from two experts: “intensive tank systems with high rates of water reuse, biological filtration and other treatment systems.” This proposal was presented to 39 different stakeholders with a specific request to consider if any farms would not fall under this scope but should be covered, and vice versa. Feedback was received from a total of 9 stakeholders (four producers, one scientist, one auditor and one ratings scheme). The main question raised was on the definition of ‘high rates’. While two producers agreed with the definition and confirmed that their systems would fall within this scope, two asked for a clear cut-off definition on water exchange rate, suggesting above 80% or 90% respectively. SeafoodWatch provided an explanation on their definition on RAS, based on the degree of water recirculation ($\geq 90\%$).

Additionally, it was noted that the definition could still include other systems (e.g. biofloc systems) that might not fall under the intent of the RAS Module, while semi-intensive systems (e.g. aquaponic) would not necessarily fall under the scope.

Suggestions were made to define the meaning of tanks (non-earthens) and/or add raceway systems to the definition.

ASC feedback evaluation process

Feedback was collected in a joined document and discussed within ASC and the Technical Advisory Group.

Based on the discussion and feedback, the following recommendations were made:

- To add raceway systems to the scope
- To change 'reuse' to 'recirculation' (this way extensive farms that reuse their water for several cycles would not fall under the scope)
- To not add a cut-off value.¹

Following public consultation, approval was received from the ASC Board. Further discussion on the scope were confirmed with the Board.

¹ The definition used by SeafoodWatch can be provided as guidance. At this point, it is in the ASC's interest for as many landbased farms farming species certified by a standard that was originally mainly developed for cage culture (e.g. salmon, seabass, seabream and meagre, tropical marine finfish, seriola and cobia) to fall under the scope of the module. These farms are certifiable now, but a significant number of indicators is not applicable. Thus, the ASC is at a reputational risk. Additionally, the RAS Module will be used for data collection purposes to inform the alignment process.