



ASC Farm Standard Fish Health and Welfare

Public Consultation Summary Report

September – October 2022

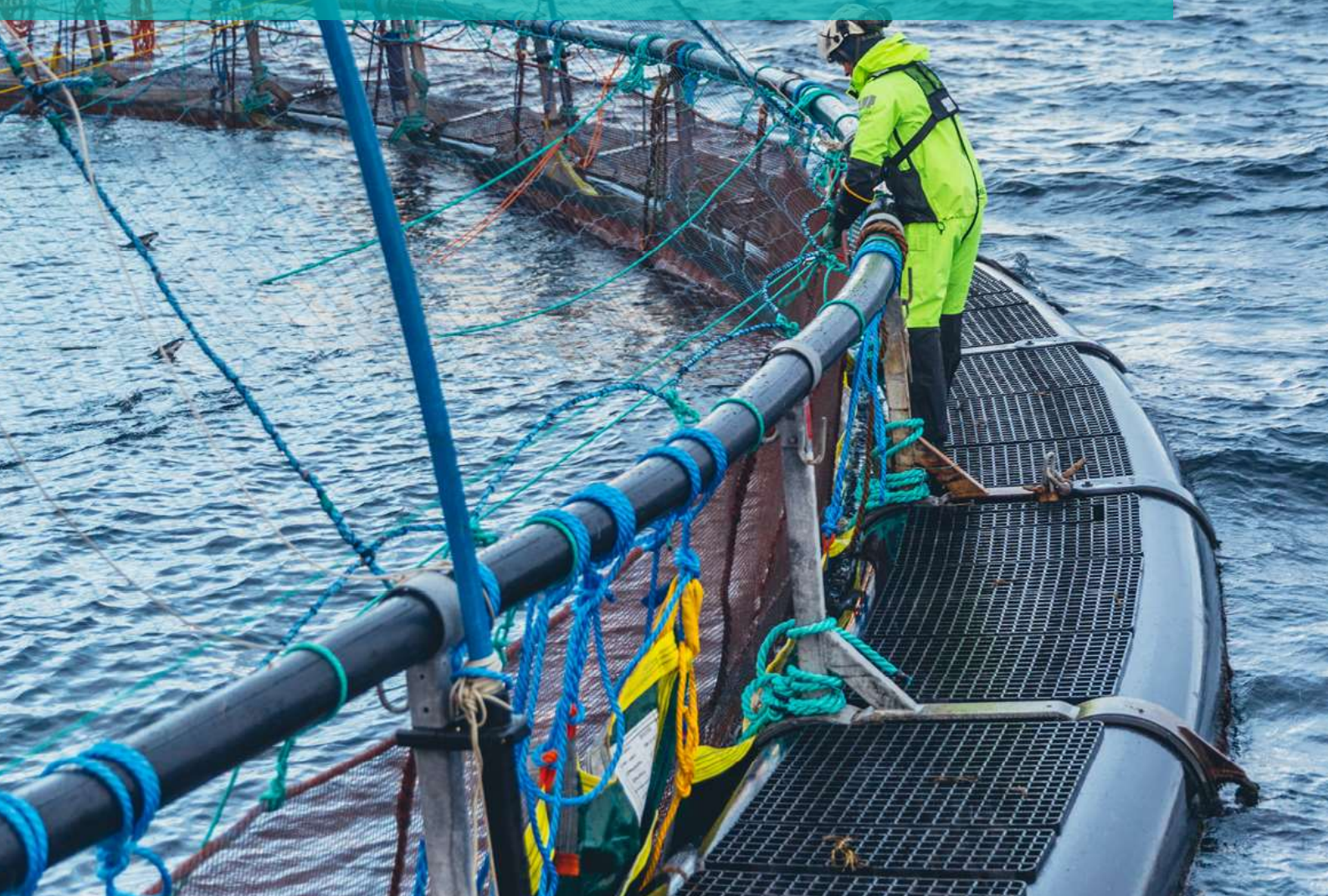


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*This report refers to ongoing policy development
and does not reflect final policy or position of the
Aquaculture Stewardship Council.*

1 Background

The objective of the ASC Farm Standard alignment process is to develop a single best-practice global aquaculture standard applicable to all farmed seafood species currently within scope of the ASC standards. The ASC Farm Standard will have production-system specific criteria and species-specific metrics where necessary. The Farm Standard comprises three core principles setting requirements to assess farms’ environmental and social performance. The public consultation that took place from September to October 2022 covered Principle 2: Criterion 2.6 - Benthic Impacts and Criterion 2.14 - Fish Health and Welfare. Further topic specific consultations will take place in the period from March to April 2023 and a final consultation on the complete Farm Standard is scheduled for September to October 2023. On-farm pilots and impact testing will also take place ahead of the final consultation. The final decision on the adoption of the ASC Farm Standard will be made in March 2024.

Alignment Process – ASC Farm Standard



Figure 1: ASC Farm Standard timeline

During the development stage of the consulted two criteria of the ASC Farm Standard, topic specific Technical Working Groups (TWG) were formed. The TWGs comprise experts from different stakeholder sectors but with specific expertise in the subject matter. Recommendations from these TWGs were incorporated into the draft of the criterion which was released for public consultation for 60 days in September 2022. This current report covers consultation objectives and outcomes relevant for the Fish Health and Welfare criterion. For consultation outcomes and insights on Criterion 2.6 - Benthic Impacts please see ASC Farm Standard PC - Benthic Impacts summary report.

1.2 Objectives

The objectives of this public consultation were to:

- Build consensus that the proposed ASC Farm Standard addresses aquaculture's key sustainability issues in line with stakeholders' expectations
 - Create awareness of the alignment process, which merges the previous 11 species standards and that it will replace those
 - Seek agreement on proposed indicators / criteria language
- Understand the impacts of proposals on specific stakeholder groups
- Gain insights from Conformity Assessment Bodies (CABs) on whether the ASC Farm Standard is auditable
- Gain insights on whether the ASC Farm Standard is applicable across all production systems, regions, species and farm sizes
- Ensure that previous stakeholder feedback on Criterion 2.14 Fish Health and Welfare was considered.

Consultations are also an important way to raise awareness of changes that are likely to affect stakeholders in coming years, provide an opportunity to engage more with programme users and build understanding about the ASC Programme and its impact.

1.3 Approach

ASC is committed to transparency to ensure stakeholders can understand the rationale for decisions on standards' content. Chapter 3 contains a summary of feedback including responses from ASC on key themes raised by stakeholders. ASC has also published [all comments received](#). To ensure stakeholders provide full and open feedback, ASC does not attribute published responses. Names and organisations of those providing feedback are published separately and annexed to this document. ASC does not accept anonymous submissions.

ASC collected feedback in four ways:

- Online survey in English;
- Online public workshops and targeted workshops with regional and international partners;
- Direct 1:1 meetings and phone calls;
- Emails with written feedback.

ASC employed several methods to engage stakeholders and increase accessibility:

- Translation of consultation questions into English, Bahasa Indonesia, Brazilian Portuguese, Chinese (simplified), French, German, Japanese, Spanish, Turkish, and Vietnamese
- Direct engagement via targeted Mailchimp campaign (email sent out to 4,474 recipients) and ASC newsletter (956 subscribers);
- Social media communication with links to ASC webpage (LinkedIn and Twitter);
- Criterion Draft 2.14 - Fish Health and Welfare in English, Bahasa Indonesia, Brazilian Portuguese, Chinese (simplified), French, German, Japanese, Spanish, Turkish, and Vietnamese;

- Slide decks on the criteria in English, Brazilian Portuguese, French, German, Japanese, Spanish, Turkish, and Vietnamese;
- A short video explaining the alignment project as well as the proposals at criteria level;
- Release of accompanying documents such as the FAQs
- Release updated version of the [ASC Farm Standards Comparison Tool](#).

2 Participation

The focus of this public consultation was to engage those whose viewpoints are crucial to the credibility of the ASC Farm Standard. These include hard-to-reach stakeholders and those critical of the Farm Standard's content, and/or standards in general as a tool to transform aquaculture towards sustainability. For consulting on the ASC Farm Standard, ASC identified 13 stakeholder categories. Within these seven priority stakeholder groups were identified:

1. Academia/Research
2. CABs/Auditors
3. Environmental and social NGOs
4. Farms (producers) or associations thereof
5. Intergovernmental organisations
6. Primary processors or associations thereof
7. Retailers/Brands or associations thereof

In total, there were 103 unique respondents (some respondents were individuals, others larger international organisations and associations) participating in the consultation activities. Some of these respondents provided feedback via multiple methods (e.g., written feedback and contributing to an online feedback workshop) and therefore this number differs from the total of 137 responses. ASC aims to balance feedback across stakeholder groups. Policy decisions are not taken on quantity of feedback or level of support alone.

Feedback Method	Responses*	Respondents*
Online survey	75 responses	68 organisations / independent individuals
Webinars/workshops	69 responses	46 organisations / independent individuals
1:1 meetings and phone calls	9 responses	7 organisations / independent individuals
Emailed feedback	4 responses	4 organisations / independent individuals
TOTAL	137 responses	103 organisations / independent individuals

Table 1: Overall participation in the public consultation on the criteria Benthic Impacts and Fish Health and Welfare of the ASC Farm Standard.

**Responses refers to actual number of feedback submissions received. *Respondents refers to the organisation or individual that submitted feedback. This amount might differ between columns in cases in which multiple people from an organisation have provided feedback, as these have been grouped together.*

Bold total number of respondents counts number of respondents only once, even if feedback was provided through multiple channels.

ASC organised two online public workshops on Fish Health and Welfare with stakeholders from different sectors and regions. These identical workshops were held over two days over a week apart to accommodate different time zones. The workshops were well attended with over 50 participants in total.

In addition to the online public workshops, ASC organised targeted feedback workshops with selected regions and stakeholders identified as particularly relevant for this consultation. The targeted workshops were well attended with about 30 participants in total.

Direct engagement, particularly personal emails, proved to be the most effective method to generate feedback for most stakeholder groups.

2.1 Progress against targets

The level of feedback from priority stakeholders was high, reflecting the resources committed to providing a range of engagement and feedback methods. The table below shows number of respondents per priority stakeholder group:

Stakeholder Group	Feedback Targets	Respondents
Academia/Research	1	7
CABs/Auditors	2	12
Environmental and social NGOs	3	19
Farms (producers) or associations thereof*	19	32
Intergovernmental organisations	4	1
Primary processors or associations thereof	8	13
Retailers/Brands or associations thereof	4	15
Other (Consultant, Feed mill, Secondary processor (trader) or association thereof and other)	-	15
TOTAL	-	103

Table 2: Number of respondents per priority stakeholder group.

* Feedback was received from five farm associations and 27 farms of which 21 are certified. Some of the farms (producers) are also primary processors.

The table below shows the feedback target and actual respondent numbers. Feedback targets across the different activities were reached in almost all key stakeholder groups except for intergovernmental organisations, where only one organisation provided feedback. Lack of resources was cited as a barrier for other potential participants. This group will be targeted again in the next public consultation using a more direct tool, possibly targeted 1:1 meetings with directed questions. Within the remaining categories some specific subgroups were underrepresented. These included mainly non-certified farms (producers). Another attempt to reach this audience will be carried out during the last public consultation.

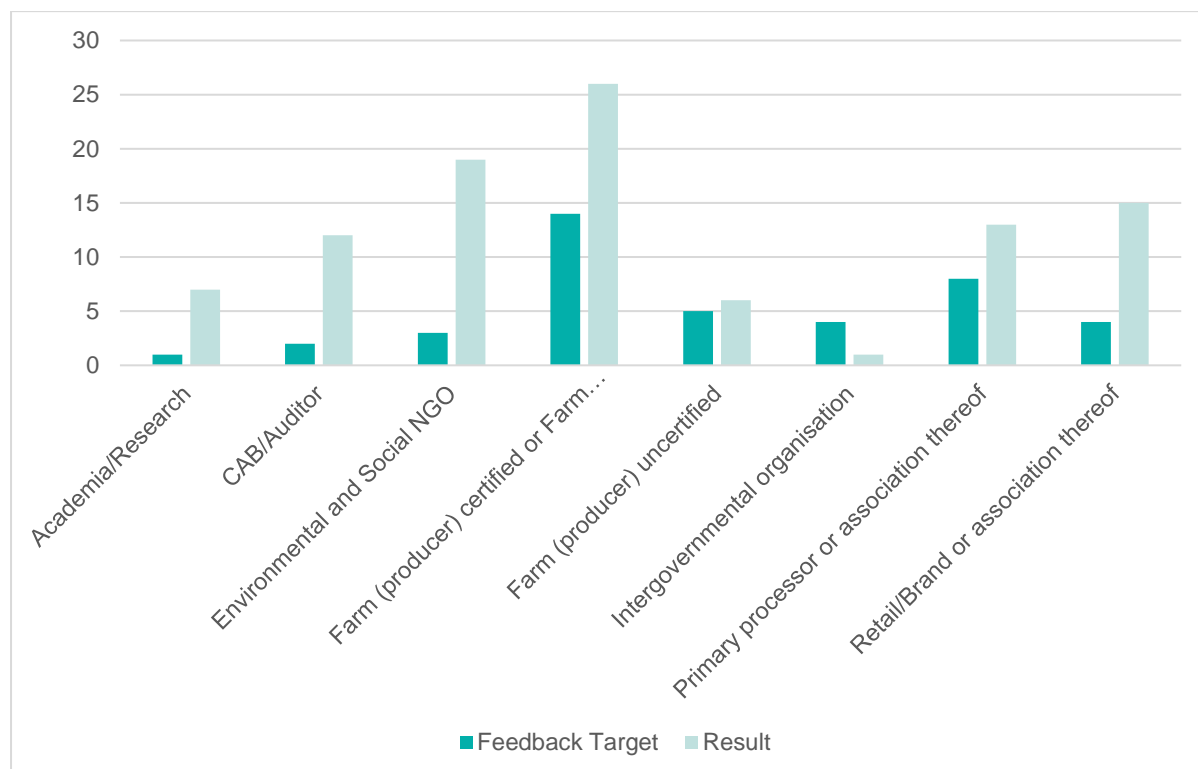


Figure 2: Sectoral representation of actual vs targets.

NB: Targets for environmental and social NGOs were only defined for internationally active NGOs. Out of the 19 NGOs that provided feedback, 6 are internationally active. Retail/brand includes feedback from a stakeholder only active in a non-priority and non-targeted market.

3 Summary of feedback

Overall, feedback from the consultation period showed strong support for the inclusion of the Criterion 2.14 - Fish Health and Welfare into the ASC Farm Standard, and stakeholders were positive about ASC’s proposal to address additional areas of concern. Several stakeholders expressed concern regarding the implementation of proposed indicators and how a consistent approach to assessing health would be undertaken. In addition, there were some concerns related to auditors’ training and their ability to determine if farm management systems were well implemented. Below are more details of feedback received on each Criterion. The feedback received will support in preparing final proposed indicators and in developing additional interpretation manual to accompany requirements.

3.1 Key themes

Key Theme	Summary of Consultation Feedback	ASC Response/Next steps
Criterion 2.14a - Fish Health and Welfare	<ul style="list-style-type: none"> - Stakeholders agreed that welfare aspects related to routine/everyday farming are well covered in 2.14, however additional guidance is required in order to access effectively behavioural and morphological scores. - A clarification was raised around the use of video for monitoring Operational Welfare Indicators (OWIs). - There was general concern between NGOs and some producers that ASC should set some metric limits for stocking densities and mortalities according to species specifications and systems. In addition, a suggestion was shared related to accuracy of removal of mortalities in ponds. - NGOs and farmers (producers), both certified and non-certified, expressed concerns about auditors’ training to determine whether the management systems were well implemented or not. - Training requirements were well accepted across stakeholder groups, but content should include explicit definition of what constitutes fish mistreatment. Stakeholders also identified a need 	<ul style="list-style-type: none"> - ASC is working on accompanying interpretation manual, including more detailed definitions and applicability of the proposed management systems. - The issues highlighted in relation to setting some metric limits are currently being revised internally, and further discussions will be held in the Technical Working Group (TWG). - ASC supports a continued engagement with CABs to understand the challenges that they might encounter in interpreting and assessing the proposed requirements. - Criterion feedback will be sought during pilots, which will help to clarify where indicators are clear both for farmers and CABs and potentially highlight challenges.

Key Theme	Summary of Consultation Feedback	ASC Response/Next steps
	<p>for materials and approved trainers from ASC in order to maintain the quality and consistency of the training required, especially in countries with limited access to training providers. A suggestion was raised in relation to the training frequency intervals in countries with continuous development training during fish health and welfare assessments, e.g., food safety authorities in Norway requires fish health and welfare refresh training every 5 years.</p> <ul style="list-style-type: none"> - One producer mentioned that water quality verification must be based on a risk assessment for parameters and frequency. NGOs considered that the minimum monitoring frequency is not enough and supports the need for a specific frequency for “needs based” water quality parameters. Some comments from different stakeholder groups suggested that monitoring of phosphorus in pens, hardness/alkalinity in ponds and redox potential/chloride concentration, in general, should be included. 	<ul style="list-style-type: none"> - Training support is being discussed internally and with external providers to maintain quality and training consistency. - Water quality frequency and additional parameters will be taken into account during the revision process and integrated as appropriate according to further discussion with the TWG.
<p>Criterion 2.14b - Handling</p>	<ul style="list-style-type: none"> - Welfare aspects related to handling operations were considered to be well covered in 2.14b and no significant issues were raised for this criterion by any stakeholder. Stakeholders stated the need for equipment design, clarification around crowding requirements, unacceptable behaviour, crowding score and that a maximum duration of overcrowding periods should be considered. Some respondents considered that ASC’s position on third-party handling should be made clear. - Stakeholders recognised that there are many situations in which anaesthetising the fish would be impossible. They acknowledge the need of anaesthetics’ use during handling operations while recognising some side effects for both the use and no use of 	<ul style="list-style-type: none"> - ASC is working on accompanying interpretation manual, including more detailed explanations about crowding behaviour and fitness assessment before crowding. - The issues highlighted in relation to out-of-water time and starvation limits are currently being revised internally, and further discussions will be held in the TWG. - ASC will trial indicators during pilots.

Key Theme	Summary of Consultation Feedback	ASC Response/Next steps
	<p>anaesthetics. General agreement was expressed in supporting the use of anaesthesia during handling.</p> <ul style="list-style-type: none"> - Stakeholders considered the best time for a fitness assessment either between one day to 48 hrs before the handling event or immediately before the handling process begins. However, clarification relating to what a fitness assessment should entail and the minimum number of fish to be assessed are required. From the salmonids industry, concerns were raised in relation to performing a fitness assessment signed off by a veterinarian or a fish health manager for every treatment, given the number of lice treatments. - Producers expressed concerns about having a limit for the out-of-water and starvation time for handling operations. NGOs and other stakeholders support having a limit of 15 seconds for out-of-water and starvation period species specific according to fish size and calculated in degree days. 	
<p>Criterion 2.14c - Slaughter</p>	<ul style="list-style-type: none"> - Most feedback was positive, with no major concerns highlighted with the criterion. Some clarifications are required in start-up checks on equipment and fish, stunning effectiveness and the need for a backup plan in case of failures. - Assessment of fish on arrival at the slaughter facility was also mentioned as an important indicator to take into consideration to evaluate fish mistreatments during slaughter operations. - A concern was raised indicating the need for clarification for whether dry and wet electrical stunning and reversible and irreversible stunning are acceptable in the indicator or interpretation manual. 	<ul style="list-style-type: none"> - ASC is working on accompanying interpretation manual, including more detailed definitions for the proposed requirement. - ASC will revisit internally the issues highlighted and further discussions will be held in the TWG. - ASC will trial indicators during pilots.

Key Theme	Summary of Consultation Feedback	ASC Response/Next steps
	<ul style="list-style-type: none"> - Several comments cautioned that the Farm Standard must be technologically neutral, noting there is not an adequate scientific basis for requiring electrical stunning over percussive stunning for some species. - The position of ASC to stunning fish in ice slurry should be clarified further because there is some confusion around the topic. Two comments support the use of ice slurry to stun and kill warm water species (tilapia, pangasius, tropical marine species), and two different comments support the use of ice slurry for Mediterranean species where the electrical stun does not always work as desired. - The use of CO2 and gas mix (CO2 and N2) for stunning was cited as an available solution to stun and kill, but the same respondents agreed with a better evaluation of the method on a large production scale because it was only tested in research facilities. - Several comments noted that no rationale has been provided for the proposed transition periods to implement the ASC approved methods to stun and kill and why they vary across species. Most respondents disagreed with an extended period of six years for marine tropical species. - Considerations from the salmonids industry stated that the stunning equipment used has an effectiveness of 95-96% and is important to differentiate between stun and kill and maybe have different targets, e.g., 95-96% stun; 100% kill. 	

3.2 Full feedback

Dashboards and full feedback are published [here](#).

3.3 Next steps

ASC will conduct further stakeholder consultation on Fish Health and Welfare, Water Quality, and an extension of the species within scope of ASC certification to include pike perch in March and April 2023. Many topics will be tested during on-farm pilot audits commencing in January 2023. A final, full 30-day consultation on the resulting ASC Farm Standard will be conducted in September 2023 before the final product is presented to the ASC Technical Advisory Group (TAG). The TAG will provide a formal recommendation to the ASC Board to adopt the ASC Farm Standard in March 2024.

Acronyms

Acronym	Definition
ASC	Aquaculture Stewardship Council
CAB	Conformity Assessment Body
NGO	Non-Governmental Organisation
OWI	Operational Welfare Indicators
PC	Public Consultation
TAG	Technical Advisory Group
TMFF	Tropical Marine Finfish
TWG	Technical Working Group

Annex: List of respondents

Organisation (Stakeholder)	Contact Person
AceAquatec	Nathan Pyne-Carter
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Acoura Marine t/a LRQA	Jose Ignacio Llorente Lopez
Acoura Marine t/a LRQA	Lewis Warren
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AGFO Teknik Kontrol ve Belgelendirme Ltd. Sti. (Agfocert)	Hasan Hüseyin Öztürk
AGFO Teknik Kontrol ve Belgelendirme Ltd. Sti. (Agfocert)	Sibel Cengiz
Agroittica Toscana	Jacopo Anchisi
Agroittica Toscana	Piergiorgio Stipa
ALDI Einkauf SE & Co. oHG (ALDI Nord)	Sofia Telaak
ALDI SOUTH Group	Moritz Konz
Algarve Centre of Marine Sciences (CCMAR)	Marco Alexandre Cavaco Cerqueira
AMITA Corporation	Naoya Ogawa
AMITA Corporation	Tomomi Itagaki
AMITA Corporation	Wataru Koketsu
Animal Law Italia	Alessandro Ricciuti
Aququa (Thailand) Ltd.	Raksaya Kumraksa
Aqua Spark	Flavio Corsin
Aquanexus	Karla Meza
Aquascot	Andrew Davie
Aquascot	Emily Purvis
Aquascot	Joel Ellis
Aquatic Life Institute / Aquatic Animal Alliance members	Tessa Gonzalez
Assurance Services International (ASI)	Jose Carroza Valdivia

Organisation (Stakeholder)	Contact Person
Australis Aquaculture	Josh Goldman
Autonomus University of Barcelona	Francesc Padros
AVRAMAR IBÉRICA	Eduardo Soler Torres
Azerbaijan Fish Farm LLC	Elshad Rzayev
Azerbaijan Fish Farm LLC	Jeyhun Aliyev
B2E CoLAB	Ana Rita A. Ribeiro
Bakkafrost Scotland Ltd	Kimberley McKinnell
British Columbia Society for the Prevention of Cruelty to Animals (BC SPCA)	Melissa Speirs
British Veterinary Association	Megan Knowles-Bacon
Bureau Veritas Certification Denmark A/S	Julie Jørgensen
Bureau Veritas Certification Holding SAS	Do Minh Thuc
Bureau Veritas Certification Holding SAS	Linh Nguyen
Bureau Veritas Certification Holding SAS	Nam Nguyen
Carrefour	Elsa de Deus
Cermaq Norway	Ingunn Johnsen
Comité Interprofessionnel Produits Aquaculture (CIPA)	Mohamed Moustapha
Compassion in World Farming (CIWF)	Elena Lara
Control Union Peru SAC	Fernanda David
Control Union Peru SAC.	Cristhian Armijos Davila
Cooke Aquaculture Scotland	Andrei Bordeianu
Cooke Aquaculture Scotland	Michelle Johnson
Cromaris	Ivana Simunovic
Cromaris	Julija Smoljan
Cromaris	Matko Kolega
Crustacean Compassion	Laura McAnea
Dainichi	Mr Yuta
Dansk Akvakultur - Danish Aquaculture	Lisbeth Less Plessner
Deutscher Tierschutzbund e.V.	Denise Ritter
Deutscher Tierschutzbund e.V.	Melanie Thill

Organisation (Stakeholder)	Contact Person
Dierenbescherming	Janneke Aelen
Djurens Rätt	Linda Björklund
Djurskyddet Sverige	Emma Brunberg
DNV Business Assurance Italy S.r.l.	Henrik Rosendahl Kristiansen
DNV Business Assurance Italy S.r.l.	Kjell Bekkevold
DNV Business Assurance Italy S.r.l.	Roar Leksen
Edeka Südwest Fleisch	Lisa Maxi Karpeles
Essere Animali ETS	Luca Melotti
Eurogroup for Animals	Douglas Waley
FAI FARMS	Murilo Quintiliano
Fish Welfare Initiative	Marco Alexandre Cavaco Cerqueira
Foods Connected	Charlotte Maddocks
Freelancer	Li Haifeng
Freelancer	Mohan Abch
Global Ocean Works (GOW)	Toshiaki Yonemori
Global Trust Certification Limited	Spyros Nikolakakis
Grand Frais	Solenne Arnal
Grieg Seafood BC Ltd.	Kristin Storry
Grieg Seafood BC Ltd.	Luke Pletsch
Grupo Culmarex	Philippe Sourd
Grupo Granjas Marinas S.A	Jose Luis Avila
HanseGarnelen AG	Leona Ritter
Hilton Seafood UK	Teresa Fernandez
Independent Auditor	Paul Casburn
Institute of Agrifood Research and Technology (IRTA)	Ana Roque
Intertek Testing Services Ltd.	Bangping Wang
Intesal	Alexander Jaramillo
JASS Ventures Pvt Ltd	Joe Antony
Kamakura Suisan Cooperative	Akiyuki Kanabo
Kingfish Zeeland	Kim Tiebie

Organisation (Stakeholder)	Contact Person
KOLOS Aqua AS - Essentia AS	Trygve Helle
Maruha Nichiro	Takashi Kouyama
Maruha Nichiro	Toshihiko Yamaguchi
Maruha Nichiro	Yuta Hamasaki
Marukin	Shingo Suzuki
MerAlliance	Vincent Gélamur
Migros-Group	Nicole Fischer
Moredun Scientific Ltd	Guillermo Bardena
Napier	Kare A. Cederstrom
Nautilus Collaboration	Belinda Yaxley
New England Aquarium	Dr. Kathryn Tuxbury
New England Aquarium	Matt Thompson
New England Seafood Ltd (Sealaska group)	Duncan Lucas
Nomad Foods	Oliver Spring
Nova Austral	Ignacio García
PICARD	Sidonie Malegeant
Prosol	Maxime Engler
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Regal Springs	Hasim Djamil
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RSPCA Australia	Melina Tensen
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Salmon Scotland	Richard Beckett
Salmones Camanchaca S.A.	Karen Muñoz
ScaleAQ/Nord university	Torstein Kristensen
Sea Farms Ltd	Louis Cattini
Sea Farms Ltd	Shannon Roberts
SeaChoice/Living Oceans Society	Kelly Roebuck

Organisation (Stakeholder)	Contact Person
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SGS Nederland BV	Nikki den Boon
Shrimp Welfare Project	Andres Jimenez Zorrilla
Skretting Japan	Yoshiaki Ina
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Superunie	Kyra Weerts
Syndicat National du Commerce Extérieur des produits congelés et surgelés (SNCE)	Annie Seng
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Tesco	Ben Weis
The Humane League	Aaron Parr
The Humane League	Shannon Davis
Université de Liège	Carole Rougeot
University of Stirling	Jimmy Turnbull
UrataSuisan	Masaki Urata
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WELFARM	Gautier Riberolles
WildFish Conservation	Matt Palmer
WOAH (OIE)	Dante Mateo
Woolworths	Anna Playfair-Hannay
WWF-Malaysia	Victor Andin
Yumigahama Fisheries Co.	Ryouji Kuranaga