



# ASC Salmon Standard v1.3 Revision

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## Summary of Consultation and Changes

March 2019 – May 2022



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## Acronyms

Acronym	Definition
ASC	Aquaculture Stewardship Council
CAB	Conformity Assessment Body
EQS	Environmental Quality Standard
HCV	High Conservation Value
NGO	Non-Governmental Organisation
PC	Public Consultation
TAG	Technical Advisory Group
TCG	Technical Consultation Group
TG	Technical Group
TOR	Terms of Reference
TWG	Technical Working Group

# 1 Background

The goal of the ASC standards is to provide a means to measurably improve the environmental and social performance of aquaculture operations. To that end, each standard undergoes a periodic review at least every five years to ensure effectiveness, based on latest knowledge and best practices. This revision of the ASC Salmon Standard had a restricted scope to address issues with the application of the sea lice management Indicator 3.1.7 – Sea Lice. Indicator 3.1.7 of the ASC Salmon Standard deals with “maximum on-farm lice levels during sensitive periods for wild salmonids”. The scope of the revision included four specific aspects:

- A. Lice species/life stage/gender for which to set a metric.
- B. Requirements for non-sensitive periods.
- C. Requirements on sea lice sampling protocols
- D. Regional approaches for setting on-farm sea lice levels.

Technical governance was carefully designed to develop recommendations for a controversial area of the standard and ensure strong stakeholder representation throughout the development phase. A Technical Working Group (TWG) was formed to support ASC with the revision. The TWG was composed of a (core) Technical Group (TG), which included a sponsor from the [ASC Technical Advisory Group \(TAG\)](#), and a (wider) Technical Consultation Group (TCG), enabling a staged consultation approach prior to full public consultation (see [Appendix I](#)).



Figure 1: Salmon Standard v1.3 review timeline

The revision of the Salmon Standard started in March 2019. A consultation on the Terms of Reference was conducted from 18 March to 18 April 2019, for 30 days. A first round of consultation was conducted for 60 days, from 8 March to 7 May 2021. A second round of consultation followed from 1 March to 30 April 2022. The final Salmon Standard v1.4 was

released on 5 September 2022. The revised [ASC Salmon Standard v1.4](#) will become effective and mandatory for all audits from 1 February 2023.

## 1.1 Approach

ASC is committed to transparency in developing standards ensuring stakeholders can understand the rationale for decisions on standards' content. Chapter 3 contains a summary of feedback including final changes and decisions on key themes raised in the feedback received. Further information on consultations is linked below:

- [Summary report and feedback from March-May 2021 consultation](#);
- [Feedback from March-April 2022 consultation](#);
- [All comments received from March-April 2022 consultation](#).

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 several ways:

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

ASC also employed several methods to engage stakeholders. These can be reviewed in the corresponding summary reports.

## 2 Participation

The focus of this public consultation was to engage those whose viewpoints are crucial to the credibility of the standard including hard-to-reach stakeholders and those critical of the ASC Salmon Standard's content and/or standards in general as a tool to transform aquaculture towards sustainability.

In total, there were 57 unique respondents (some respondents were individuals, others larger international organisations and associations representing many individuals and organisations) participating in the consultation activities. Some of these respondents provided feedback via multiple methods. Within the evaluation, their input is only counted once. ASC aims to balance feedback of all stakeholder groups and does not weight feedback dependent on quantity per group. Hence, the tables below serve informative purposes only.

Feedback Method	Responses in 2021	Responses in 2022	Total
Online survey	27	24	51
Webinars/workshops	4	2	2
1:1 meetings and phone calls	1	2	2
Emailed feedback	2	3	5
<b>TOTAL</b>	<b>30</b>	<b>27</b>	<b>57</b>

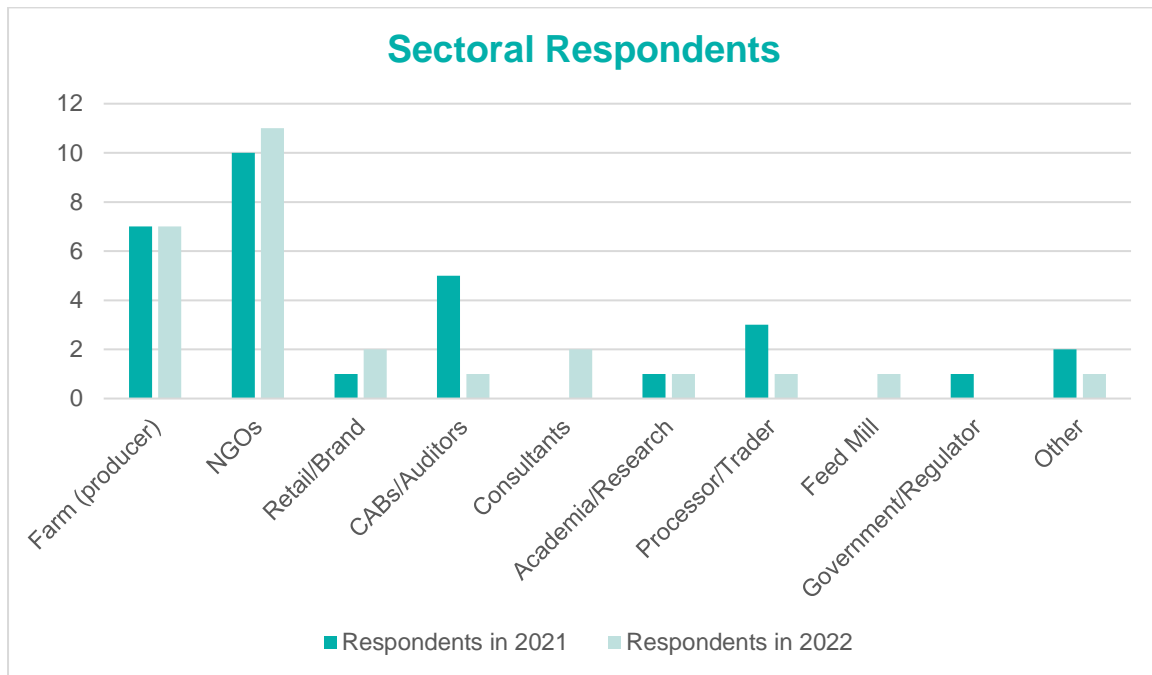
Table 1: Overall participation in the public consultation on the draft of the ASC Farm Standard.

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

The table below shows number of respondents per priority stakeholder group:

Stakeholder Group	Respondents in 2021	Respondents in 2022	Total
Farm (producer) or associations thereof	7	7	14
Environmental and Social NGOs	10	11	21
Retail/Brand or association thereof	1	2	3
CABs/Auditors	5	1	6
Consultants	0	2	2
Academia/Research	1	1	2
Processor/Trader	3	1	4
Feed Mill	0	1	1
Government/Regulator	1	0	1
Other (Fisherman, Individual, and other)	2	1	3
<b>TOTAL</b>	<b>30</b>	<b>27</b>	<b>57</b>

Table 2: Number of respondents per stakeholder group.



*Figure 2: Sectoral representation of 2021 vs 2022*

In 2021, consultation target groups were industry, NGOs, academia, and governments. Most feedback was received from industry (producers, processors, and retailers) and from NGOs. Additional feedback from academia and governments was identified to be sought during the next public consultation in order to better understand potential areas of concern for these stakeholder groups.

Although ASC reached a large stakeholder base during the public consultation in 2022, securing feedback from some stakeholder groups was challenging. Feedback from consultants increased, however no feedback was received from governments and only one stakeholder from academia commented on the sea lice indicator.

### 3 Summary of feedback

Feedback was received on three key themes:

#### 1. ASC regional sea lice thresholds and sensitive periods

Some stakeholders believed that ASC should go beyond regulation regarding sea lice limits and sensitive periods. Within its deliberations, the Technical Group (TG) that supported ASC with this revision noted that there is no globally agreed “silver bullet” level for precautionary maximum lice levels on farms, nor is there a globally relevant length for sensitive periods. On this basis, the new requirements use, as a starting place, the lowest sea lice limit and the sensitive periods established in the different regions today (established either by the regulators or through an industry code of practice). The new requirements make clear that ASC will revise these limits and periods independently from the local regulatory process should evidence compel this. The TG did not believe it had sufficient scientific evidence to set a sea lice limit or sensitive period length different from that established regionally in regulation.

#### 2. Timeline for bringing lice levels below established thresholds

Stakeholders had different opinions on the timeline allowed by ASC for bringing sea lice levels below the established ASC sea lice thresholds. Suggestions ranged between 0 days to 1 to 1.5 months. Within its new requirement, ASC set the timeline at three weeks. Furthermore, the new requirements provide clarity on the consequences if a farm fails to maintain sea lice levels below the ASC sea lice thresholds by requiring disclosure to its certification body and by establishing that the product will not be eligible to be sold as certified if a farm fails to bring sea lice levels below the thresholds within the set timeline.

#### 3. Treatment and exemptions

Some stakeholders expressed concerns about the allowances for exemptions (for sampling and treating) included in the new requirements. ASC believes those exemptions are adequate as they respond to farmed fish welfare considerations and operational challenges associated with treatments. The new requirements are clear: exemptions are only allowed by the veterinarian or fish health professional and should be fully documented.



### 3.1 Main feedback received

The table below shows the key feedback received and the corresponding standard changes.

Theme	Summary of Consultation Feedback	ASC Response and Standard Changes
<b>ASC regional sea lice thresholds and sensitive periods</b>	ASC should raise the bar beyond legal requirements	The new set of requirements uses, as a starting point, the lowest sea lice limits (including sea lice stage/gender) and the sensitive period established by regulators or agreed upon by the industry. The new set of requirements also requires farms to report and take action to reduce sea lice levels within a defined period, with consequence if failing to do so. These combined elements go beyond the legal requirements.
	ASC should set year-round limits in areas with species that stay near to the shore.	Focusing on sensitive periods is in line with the intent of maintaining a balance between seeking lower lice levels year-round, prioritising the specific periods when wild salmonids at their most vulnerable stage are present (i.e. out-migrating juveniles), and avoiding pressure on resistance development through repeated and more frequent treatments.
	ASC should set a threshold for <i>caligus</i> in BC since historical data exists and some studies point to pressures on wild salmonids from <i>caligus</i> .	Since <i>Caligus</i> is a non-specialist parasite, coming from multiple sources, affecting both wild and farmed fish, it is much harder to show causality thus, challenging to set a farm limit. In recommending farms in West Canada to include the reporting of adult <i>caligus spp</i> , ASC believes that the data generated by the revised indicator will provide the basis for future revisions of the

Theme	Summary of Consultation Feedback	ASC Response and Standard Changes
		requirement aiming to decide whether lice management strategies should further consider <i>C. clemensi</i> .
<b>Timeline for bringing lice levels below established thresholds</b>	Stakeholders had different views on the timeline for bringing the sea lice level below the maximum threshold established by the new standard (one to two weeks, two weeks, four weeks, forty-two days).	21 days for bringing sea lice level below the ASC thresholds is considered an acceptable time limit.
<b>Treating and exemptions</b>	Regarding the veterinarian or fish health professional exempting fish from being treated, this requirement could be used as a means for allowing breaches of the threshold to continue beyond the exceedance deadline, remain certified and sell their product with the ASC label.	It is acceptable that fish health professionals exercise their professional duty and judgement.

## 3.2 Full feedback

For the summary report from the public consultation from March-May 2021 please see [here](#). Full feedback and the summary report from the public consultation conducted in March-April 2022 is available [here](#).

## Appendix I

The table below provides an overview of the staged consultation approach conducted during the revision.

Period	Activity	Deliverable	Action
<b>February 2020</b>	Request for TCG initial feedback on the potential aspects <sup>1</sup> , to be considered within the revision (the scope) and their prioritisation.	TCG view on the aspects to be considered within the scope of the revision and on the sequence in which these aspects should be discussed.	TG agreement on the aspects to be considered within the scope of the revision and the sequences in which these should be discussed.
<b>November 2020</b>	Request for TCG feedback on 1 <sup>st</sup> draft of recommendations for revise indicators for aspects A, B and C and on a recommended approach to arrive to revise indicators for aspect D.	TCG feedback on the 1 <sup>st</sup> draft of recommendations for revise indicators for aspects A, B and C and on a recommended approach for aspect D prior to 1 <sup>st</sup> Public Consultation.	TG assessed feedback received from TCG and a revised 1 <sup>st</sup> draft of recommendations for revise indicators for aspects A, B and C and on a recommended approach for aspect D was confirmed for 1 <sup>st</sup> Public Consultation.
<b>March - April 2021</b>	<b>1<sup>st</sup> 60 Days Public Consultation</b>		
<b>November 2021</b>	Request for TCG feedback on 2 <sup>nd</sup> draft of recommendations for revise indicators for aspects A, B, C and D and on proposed revised indicator language.	TCG feedback on the 2 <sup>nd</sup> draft of recommendations for revise indicators for aspects A, B, C and D and on proposed revised indicator language.	TG assessed feedback received from TCG and a revised 2 <sup>nd</sup> draft of recommendations for revise indicators for aspects A, B, C and D and on proposed revised indicator language was confirmed for 2 <sup>nd</sup> Public Consultation.

<sup>1</sup> Lice species/life stage/gender for which to set a metric, requirements for non-sensitive periods, regional approaches to the indicator, requirements on sampling protocols, farmed fish welfare, impacts of sea lice from farmed fish on non-salmonids.

Period	Activity	Deliverable	Action
March - April 2022	2 <sup>nd</sup> 60 Days Public Consultation		
June 2022	TCG invited to provide comments on final proposed revised indicators.	TCG feedback on final proposed revised indicators.	TCG feedback on final proposed revised indicators assessed by ASC prior to TAG recommendation for ASC Board approval.

## Annex I: List of respondents (PC 2021)

Stakeholder group	Organisation	Name
CAB/Auditor	<b>AMITA</b>	Wataru Koketsu
Environmental NGO	<b>Argyll Fisheries Trust</b>	Alan Kettle-White
Environmental NGO	<b>Atlantic Salmon Trust</b>	Mark Bilsby
CAB/Auditor	<b>bio.inspecta</b>	Stephen Leporati
Salmon farm (producer) or association thereof	<b>Cermaq Norway AS</b>	Ingunn Johnsen
CAB/Auditor	<b>Control Union</b>	Kristian Vargas
Government	<b>Crown Estate Scotland</b>	Alex Adrian
Environmental NGO	<b>Fidra</b>	Clare Cavers
Environmental NGO	<b>Fisheries Management Scotland</b>	Polly Burns
Environmental NGO	<b>Friends of the Sound of Jura</b>	John Aitchison
Salmon farm (producer) or association thereof	<b>Grieg Seafood</b>	Kristin Storry
Retail/Brand or association thereof	<b>IKEA KOREA</b>	Jeongah Kim
Salmon farm (producer) or association thereof	<b>Invermar</b>	Judith Collins
Processor	<b>Labeyrie Fine Foods</b>	Manon Durbec
CAB/Auditor	<b>Lloyd's Register</b>	Matthew James; Paco Padilla
Individual	<b>N/A</b>	Ewan Kennedy
Academia/Research	<b>Name redacted; consent not given</b>	
CAB/Auditor	<b>Name redacted; consent not given</b>	
Environmental NGO	<b>Name redacted; consent not given</b>	
Environmental NGO	<b>Name redacted; consent not given</b>	
Fisherman	<b>Name redacted; consent not given</b>	
Processor	<b>Name redacted; consent not given</b>	
Processor	<b>Name redacted; consent not given</b>	
Farm (producer) or association thereof	<b>Name redacted; consent not given</b>	
Farm (producer) or association thereof	<b>Name redacted; consent not given</b>	

<b>Stakeholder group</b>	<b>Organisation</b>	<b>Name</b>
Farm (producer) or association thereof	<b>Name redacted; consent not given</b>	
Salmon farm (producer) or association thereof	<b>Nova Sea AS</b>	Samuel Anderson
Environmental NGO	<b>SeaChoice</b>	Kelly Roebuck
Environmental NGO	<b>The Aquatic Life Institute</b>	Tessa Gonzalez
Environmental NGO	<b>The Game &amp; Wildlife Conservation Trust</b>	Dylan Roberts

## Annex II: List of respondents (PC 2022)

Stakeholder group	Organisation	Name
Environmental NGO	<b>Agrupación turística, cultural y medioambiental Mar y Tierra</b>	Tamara Ojeda Uribe
Farm (Producer)	<b>Arnarlax</b>	Nikolas Tzamouranis
CAB/Auditor	<b>Auditor</b>	Naoya Ogawa
Environmental NGO	<b>Coastal Communities Network - Scotland</b>	John Aitchison
Farm (Producer)	<b>Danish Aquaculture Association</b>	Lisbeth Less Plessner
Environmental NGO	<b>Fauna &amp; Flora International</b>	Gabriella Church
Environmental NGO	<b>Fisheries Management Scotland</b>	Charlotte Middleton
Farm (Producer)	<b>Grieg Seafood BC Ltd</b>	Kristin Storry; Luke Pletsch
Farm (Producer)	<b>Japan Salmon Farm (JSF)</b>	Suzuki Kosuke
Farm (Producer)	<b>JASS Ventures Pvt Ltd</b>	Joe Antony
Consultant	<b>JLB Management Consultancy Pty Ltd</b>	Dr Peter Lauer
Retail/Brand or association thereof	<b>Labeyrie Fine Foods (Group)</b>	Manon Durbec
Academia/Research	<b>Leibniz-Institute of Freshwater Ecology and Inland Fisheries (IGB)</b>	Fabian Schäfer
Environmental NGO	<b>Living Oceans Society / SeaChoice</b>	Kelly Roebuck; Karen Wristen
Environmental NGO	<b>Marine Conservation Society</b>	Dawn Purchase
Secondary Processor (Trader)	<b>Meralliance (Thai Union group)</b>	Vincent Gelamur
Environmental NGO	<b>Monterey Bay Aquarium Seafood Watch</b>	Tyler Isaac
Farm (Producer)	<b>MOWI ASA</b>	Catarina Martins
Retail/Brand or association thereof	<b>Nomad Foods</b>	Oliver Spring
Environmental NGO	<b>Salmon and Trout Conservation Scotland</b>	Andrew Graham-Stewart
Farm (Producer)	<b>Salmon Scotland</b>	Richard Beckett
Consultant	<b>Seagreen Research</b>	Peter Bridson
Feed Mill	<b>Skretting Japan</b>	Yoshiaki Ina; Ken Sakurai
Other (Technical supplier)	<b>Stingray Marine Solutions AS</b>	Julie Døvlø Johansen



Stakeholder group	Organisation	Name
Environmental NGO	<b>Sustainable Fisheries Partnership (SFP)</b>	Elena Piana, Dave Martin, Paul Bulcock
Environmental NGO	<b>WWF</b>	M. Macleod on behalf of WWF
Farm (Producer)	<b>Yumigahama Fisheries (弓ヶ浜水産)</b>	Ryouji Kuranaga; Hatsumi Wakai (若井初実); Akira Takeshita