

# Terms of Reference (ToR)

## *for an operational review/ revision of the ASC Pangasius, Tilapia and Salmon Standards*

This document is publicly available on the ASC website.  
Comments are welcome and appreciated. Form for submitting comments is in the annex (at the end  
of this document)

### Document history

Version	Date	Description of amendment	Affected section/ page
1.0	16 March 2015	New TOR	n/a

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## 1. Introduction

The Aquaculture Stewardship Council (ASC) was founded in 2010 by World Wide Fund for Nature (WWF) and the Dutch Sustainable Trade Initiative (IDH) to be the host of the standards developed by the WWF facilitated Aquaculture Dialogues.

The first standards became operational in 2012 after the system of accreditation and certification was established.

Currently, the ASC manages seven standards with 125 farms being certified against the pangasius (45), salmon (28), tilapia (27), shrimp (13) and trout (11) ([ASC Certification Update Feb. 2015](#)). Further farms (68) are in assessment, including a number being assessed against the bivalve standard.

Since late 2014 the ASC has initiated a [process to develop a Core standard](#) with the aim to:

- (i) deliver a higher level of consistency across the standards,
- (ii) provide greater clarity to standards users,
- (iii) align the content and structure of the standards,
- (iv) allow for the easier development of standards for new species, and
- (v) allow for the further expansion of ASC reach and impact.

While the Core standard process is focussed on standards consistency, clarity, structure and the like, this Operational Review was triggered as a result of the monitoring of the assessment process by Accreditation Services International, our internal review of certification reports and feedback received from users of the most implemented standards to-date: pangasius, salmon and tilapia.

The rationale for this review is in line with the ASC's policy on when such work should be triggered for initiating an operational review of a particular requirement within the standard, which are:

- a. A particular requirement or set of requirements is not meeting the intent as set out in the ASC's Theory of Change of how ASC seeks to influence the uptake of global best practice in aquaculture.
- b. Information, which was not available to the standard's dialogue process, suggests that the intended outcome of a particular requirements or set of requirements is not being met.
- a. Industry best practice<sup>1</sup> was not correctly captured within a requirement or set of requirement when a particular standard was launched to market.

This operational review is to be undertaken earlier than the planned five-year cycle as specified in the [ASC's Standard Setting Procedure](#), to respond in a timely manner to the valuable feedback of standards users, ASI and our own internal processes to continuously improve the standards. In case revision to any parts of the standards' content is deemed necessary, the process outlined in the above procedure will be strictly followed, unless otherwise indicated by the decision of the ASC Supervisory Board and Technical Advisory Group. If that should be the case, this TOR will be updated to reflect actual status of the process.

Coherence of the two processes – Core standard and Operational review - will be assured at all time to maintain clarity for interested parties.

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<sup>1</sup> According to the ASC's Theory of Change, its definition of "best practice" is: at the launch of a standard, approximately 15 per cent of the best performing farms will be able to meet that standard's requirements.

### **ASC vision and mission**

The vision of the Aquaculture Stewardship Council (ASC) is a world where aquaculture plays a major role in supplying food and social benefits for mankind whilst minimizing negative impacts on the environment.

The goal of the ASC is to transform aquaculture towards an environmentally and socially responsible food source. ASC aims to achieve this by promoting standards for best environmental and social aquaculture performance<sup>\*2</sup> and rewarding responsible farming practices through standard setting and certification.

### **About this document**

This document provides an overview of and guidance for both the ASC and stakeholders to review and possibly revise the pangasius, salmon and tilapia standards. It explains:

- (i) why this review is needed (sections 1&2),
- (ii) the objectives in reviewing these standards (section 3),
- (iii) scope of the review (section 4),
- (iv) stakeholder groups that are affected by this review and how to reach out to them in order to ensure a credible review/revision process (section 5),
- (v) detailed steps of the process (section 7),
- (vi) decision making procedure (section 8) as well as
- (vii) potential risks of the outcome of the review/revision together with measures to deal with those risks (9).

In normal circumstances, the TORs for the initial development of the standards would be updated. However, this document is developed anew since the standards were not originally created by the ASC but through the 'Aquaculture Dialogues', a multi-stakeholder process facilitated by WWF. However, this document is closely linked with the TOR for the development of a Core standard.

This TOR is open for a one-month public comment period. Comments on this TOR should be submitted in the form provided in the Annex and sent to the ASC contact person indicated on the form. On conclusion of this period the document will guide the operational steps of this process and any changes will be documented in the 'history table' on page 1).

## **2. Justification of need for the standard**

This is not a new standard development process. This TOR is concerned with exploring the need for review and possible revision of existing and operational standards.

## **3. Objectives of the standards and this review**

The goal of the ASC standards is to provide a means to measurably improve the environmental and social performance of pangasius, tilapia and salmon aquaculture operations.

This operational review aims to ensure continued relevance and effectiveness of the standards in terms of inclusion of the industry best practice.

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<sup>2</sup> According to the ASC Theory of Change, its definition of "best practice" is: at the launch of a standard, approximately 15 per cent of the best performing farms will be able to meet that standard's requirements.

#### 4. Scope of this review/revision

It is not intended that this will be a full review of the ASC standards but a focussed review on areas where the effectiveness of a standard is not as anticipated or will not deliver on the intent set out in ASC's Theory of Change.

The review will cover at least the following:

1. Salmon Standard:
  - a. Feed conversion ratio
  - b. Marine mammal interaction
  - c. Smolt production in fresh water (lakes)
  - d. Copper Nets Treatment
  - e. Clarifying language across standard where proven necessary
2. Tilapia Standard:
  - a. Use of antibiotics in the Tilapia Standard
  - b. Clarifying language across standard where proven necessary
3. Pangasius Standard:
  - a. Use of antibiotics
  - b. Feed conversion ratio
  - c. Total Nitrogen and Total Phosphorus
  - d. Clarifying language across standard where proven necessary

Stakeholder input is sought to identify other areas appropriate for this operational review as noted above. Feedback may also be submitted on issues outside of the scope of this review. ASC welcomes this feedback and will acknowledge and record issues submitted to inform a full review of the ASC standards in the future.

#### 5. Stakeholder mapping

Like the Core standard, the same major groups of stakeholders that were involved in the Aquaculture Dialogues to develop these three standards will be invited to engage in this process, especially if revisions are contemplated. In addition, this operational review process will also reach out to the same stakeholder groups that will be participating in the development of a Core standard and associated revisions. Identified stakeholder groups are:

- Farmers, including those with certified or in assessment farms.
- Communities adjacent to farms seeking certification
- Industry, including suppliers and retailers
- Civil society organisations with focus on both major areas of the standards – environmental and social
- Scientists
- Conformity assessment bodies (CABs), especially those having audited and certified the farms.

The table below outlines major stakeholder groups, their respective relevance and interest in this Operational Review process, their key issues, and how the ASC is going to engage with them, particularly if a decision to revise any of the three standards is made.

The ASC will also monitor participation of stakeholders over the life cycle of the Operational Review process to strive for balanced and effective stakeholder participation.

Main stakeholder groups	Relevance (why they should participate in the process)	Interest in the process and standards	Outreach strategies for participation in revision	Communication means	Participation goal
<p><b><i>(Pangasius, salmon and tilapia) aquaculture farms, both certified and working towards certification</i></b></p> <p><b><i>(including farm trade bodies / representative organisations</i></b></p>	<p>Potentially most directly affected group. In order for standards to be effective, requirements in these must be possible in practice. Fish farms can provide these practical insights.</p>	<p>Applicability and achievability of the changes</p>	<ul style="list-style-type: none"> <li>- direct contact with farms in the system</li> <li>- where necessary, translation of certain process documents (e.g. this TOR, draft standards, synopsis, final standards</li> <li>- via Conformity assessment bodies (CABs)</li> <li>- local/regional workshops, where and when necessary</li> <li>- participation in pilot</li> </ul>	<ul style="list-style-type: none"> <li>- E-mail newsletter (if possible)</li> <li>- Website (if possible)</li> <li>- Webinars (if possible)</li> <li>- In person to the extent possible (e.g. workshops)</li> <li>- Through trade associations</li> </ul>	<ul style="list-style-type: none"> <li>- Both audited (certified and in assessment) and non-audited farms in all three species</li> <li>- Farms in all active countries and regions</li> </ul>
<p><b><i>Communities (around certified farms and farms in assessment)</i></b></p> <p><i>(This group may be represented by Social NGO's, see below)</i></p>	<p>Directly affected group in case of changes to standards content that would have an effect on them when farms implement the changes</p>	<p>Need a fair voice in both standards revision and farm assessment processes.</p>	<ul style="list-style-type: none"> <li>- where necessary, translation of certain process documents (e.g. this TOR, draft standards, synopsis, final standards</li> <li>- via social ngo's where possible</li> <li>- local/regional workshops, where and when necessary</li> <li>- participation in pilot</li> </ul>	<ul style="list-style-type: none"> <li>- E-mail newsletter (if possible)</li> <li>- Website (if possible)</li> <li>- Webinars (if possible)</li> <li>- In person to the extent possible (e.g. workshops)</li> <li>- Through (local) social / environmental ngo's</li> </ul>	<ul style="list-style-type: none"> <li>- At least people living around audited farms in all active countries and regions</li> </ul>
<p><b><i>Processing companies / Trade</i></b></p>	<p>Processing and trade companies match supply and demand. Changes on either side may affect their work directly.</p>	<p>Costs for sourcing and availability of certified products must be in line with demand and sales of those.</p>	<ul style="list-style-type: none"> <li>- Direct contact with these companies (e.g. through ASC Outreach colleagues)</li> <li>- Face-to-face meetings at or around conferences/trade fairs</li> </ul>	<ul style="list-style-type: none"> <li>- E-mail newsletter</li> <li>- website</li> <li>- webinars</li> <li>- In person to the extent possible (e.g. workshops)</li> <li>- Trade press</li> </ul>	<ul style="list-style-type: none"> <li>- Companies trading any of the three species</li> <li>- Companies in all active countries and regions</li> </ul>

Main stakeholder groups	Relevance (why they should participate in the process)	Interest in the process and standards	Outreach strategies for participation in revision	Communication means	Participation goal
<b>Retail</b>	Continuous supply at reasonable price. Credible, attainable standards.	Price and availability of products is important. Retail likes to make sure relevant issues will be covered by the ASC certification program while not raising costs of implementing changes	<ul style="list-style-type: none"> <li>- Direct contact with these companies (e.g. through ASC Outreach colleagues)</li> <li>- Face-to-face meetings at or around conferences/trade fairs</li> </ul>	<ul style="list-style-type: none"> <li>- E-mail newsletter</li> <li>- website</li> <li>- webinars</li> <li>- In person to the extent possible (e.g. workshops)</li> <li>- Trade press</li> </ul>	<ul style="list-style-type: none"> <li>- Companies trading any of the three species</li> <li>- Companies in all countries and regions involved in producing or buying ASC-</li> </ul>
<b>Environmental NGO's</b>	Standards are aimed at reducing the environmental impact.	Changes to the standards must contribute to addressing key environmental concerns.	<ul style="list-style-type: none"> <li>- Direct contact with these organisations</li> <li>- Face-to-face meetings at or around conferences/trade fairs</li> </ul>	<ul style="list-style-type: none"> <li>- E-mail newsletter</li> <li>- website</li> <li>- webinars</li> <li>- In person to the extent possible (e.g. workshops)</li> </ul>	<ul style="list-style-type: none"> <li>- Between 1 to 5 engo's (who could be regarded as representatives of engo's at large. This should include local organisations to the extent reasonably possible) actively participating</li> <li>- A wider group to provide input during public consultation</li> </ul>
<b>Social NGO's</b>	Standards are aimed at reducing the social impact (farm workers & communities)	Changes to the standards must contribute to addressing key social concerns.	<ul style="list-style-type: none"> <li>- Direct contact with these organisations</li> <li>- Face-to-face meetings at or around conferences/trade fairs</li> </ul>	<ul style="list-style-type: none"> <li>- E-mail newsletter</li> <li>- website</li> <li>- webinars</li> <li>- In person to the extent possible (e.g. workshops)</li> </ul>	<ul style="list-style-type: none"> <li>- Between 1 to 5 sngo's (who could be regarded as representatives of sngo's at large. This should include local</li> </ul>

Main stakeholder groups	Relevance (why they should participate in the process)	Interest in the process and standards	Outreach strategies for participation in revision	Communication means	Participation goal
					organisations to the extent reasonably possible) actively participating - A wider group to provide input during public consultation
<b>Conformity Assessment Bodies (CABs)</b>	Standards' content directly relates to CABs' internal processes/documents.	CABs need to be able to build a viable business model based on credible assessments of the standards	<ul style="list-style-type: none"> <li>- Direct contact with these organisations</li> <li>- Face-to-face meetings at or around conferences/trade fairs</li> </ul>	<ul style="list-style-type: none"> <li>- E-mail newsletter</li> <li>- website</li> <li>- webinars</li> <li>- In person (e.g. workshops)</li> </ul>	<ul style="list-style-type: none"> <li>- 1 or 2 CABs (who could be regarded as representatives of CABs at large) actively participating</li> <li>- A wider group to provide input during rounds of public consultation</li> </ul>
<b>Farm inputs suppliers (feed, broodstock, etc.)</b>	In order for the standards to be effective, requirements in these areas must be possible in practice. Suppliers to fish farms can provide these practical insights.	Changes to the standards are reasonable but should not put their business at risk due to inapplicability	<ul style="list-style-type: none"> <li>- direct contact with suppliers</li> <li>- where necessary, translation of certain process documents (e.g. this TOR, draft standards, synopsis, final standards</li> <li>- local/regional workshops, where and when necessary</li> <li>- possibly, participation in pilot</li> </ul>	<ul style="list-style-type: none"> <li>- E-mail newsletter</li> <li>- website</li> <li>- webinars</li> <li>- In person to the extent possible (e.g. workshops)</li> <li>- Trade press</li> </ul>	<ul style="list-style-type: none"> <li>- 1-2 inputs suppliers delivering to farms in each species</li> <li>- Delivering to farms in all active countries and regions</li> </ul>
<b>Scientists / Academics</b>	ASC aims to bring together today's state of the art in fish	Providing scientific data where decided needed.	<ul style="list-style-type: none"> <li>- direct contact with scientists</li> <li>- where necessary, organise</li> </ul>	<ul style="list-style-type: none"> <li>- E-mail newsletter</li> <li>- website</li> <li>- webinars</li> </ul>	<ul style="list-style-type: none"> <li>- Research potentially related to farms across all active</li> </ul>

Main stakeholder groups	Relevance (why they should participate in the process)	Interest in the process and standards	Outreach strategies for participation in revision	Communication means	Participation goal
	farming and sound scientific evidence.		discussions with them - Where necessary, have them do specific research on identified topics.	- In person to the extent possible (e.g. workshops)	countries and regions
<b>Governments (incl. UN)</b>	Cross check potential legal implications of proposed changes.	For governments it is important to be assured that standards are not imposing trade barriers.	- direct contact with government officials (or through consultants) - where necessary, organise discussions with government officials - Where necessary, have them advise on solutions for identified legal topics.	- E-mail newsletter - website - webinars - In person to the extent needed (e.g. workshops)	- related to farms across all active countries and regions related to the three species
<b>Service Providers (e.g. consultants who have done BEIAs or p-SIAs)</b>	Can bring in practical experience: what worked well and what should be reconsidered?	A more effective (and efficient) approach to BEIA and p-SIA and other parts of the standard(s)	- Direct contact - Indirect contact via CABs	- E-mail newsletter - website - webinars - In person (e.g. workshops)	- 1 or 2 individuals (who could be regarded as representatives of service providers at large) actively participating - A wider group to provide input during rounds of public consultation
<b>Other aquaculture standards/schemes (e.g. GlobalG.A.P., BAP)</b>	In order to facilitate the uptake of sustainability initiatives at large, it is important for schemes like the ASC and others, to be as	To provide input into the process on future plans, which may not yet be available in the public domain.	- Since the ASC has a MoU in place with BAP and GG, there is regular contact between the 3 organisations, as well as 1:1 with either of those.	- E-mail newsletter - website - webinars - In person to the extent possible (e.g. workshops) - As observers in relevant	- related to all species the ASC is applicable to and to farms across all active countries and regions



Main stakeholder groups	Relevance (why they should participate in the process)	Interest in the process and standards	Outreach strategies for participation in revision	Communication means	Participation goal
	aligned as possible. Hence the MoU between the ASC, GG and BAP.		- Like in other projects (e.g. ASC Feed Standard development), we will invite both organisations as observers to relevant meetings.	meetings.	

## 6. Guiding principles

In addition to the guiding principles for standard setting outlined in the ASC Standard Setting Procedure, the following apply to this revision process:

**Focus.** Revision and public consultation must revolve only around improvement areas that have been identified under Section 4 – Scope of this review/revision of this document. This may include additional areas to be reviewed as suggested by stakeholders within 30 days after this document goes public.

**Rapid.** When changes to the standards are obvious and there is no serious disagreement amongst stakeholders, the revision process may be shortened to make the standards available for implementation as soon as possible. Depending on the nature of the changes, the Supervisory Board together with the Technical Advisory Group may decide to reduce either:

- (i) public consultation rounds or
- (ii) their period, or
- (iii) skip certain steps in the process, or
- (iv) combination thereof.

Should any changes be made the timely updating of TOR will occur and stakeholders informed.

## 7. Process of the standards review/revision

On the assumption that content of the standards will be revised as the result of the review, the full standard setting process will be followed, including public consultation rounds. On the other hand, the process may as well be shortened commensurate with nature and magnitude of changes.

The table below lists the steps for this process as if it would undergo the full standard setting process.

Activity	Deadline	Output	By:
Publish this TOR	16 March 2015	Stakeholders are informed and provide feedback to the process within 30 days	ASC Secretariat
Revise the TOR (if needed) based on public feedback	Late April 2015	Updated TOR for the process	ASC Secretariat
Call for TWG members	15 March for engagement in May 2015	TWG members available to take up the assignment	ASC Secretariat
Email sign off TWG members	End April 2015		Supervisory Board
Review the standards with regard to identified improvement areas	April - May 2015	Review report including recommendations for changes (if necessary)	ASC Secretariat
	May 2015		TWG
Take decision on embarking the revision process	June 2015	Revision process will officially starts	Board + TAG

Activity	Deadline	Output	By:
Make changes to the standards	From mid April to end of June 2015	Internal draft revision	ASC Secretariat
	June 2015		TWG + TAG
Endorse the draft for public consultation	Mid July 2015	Draft for consultation	TAG
Prepare guidance for stakeholders to comment (e.g. scope for commenting, format for sending comments)	April 2015	User-friendly guidance/format for commenting	ASC Secretariat
Public Consultation – 1 <sup>st</sup> draft revision	Mid July 2015 – mid August 2015 <i>This period may be shortened if deemed necessary</i>	Draft v1.0 published on ASC website  Announcement sent to relevant stakeholders (direct and via publications in relevant media)  Comments from external stakeholders	Stakeholders
Process comments from external stakeholders	August 2015	Summary of comments + TWG's reaction to it and list of anonymous organization-based comments published on website	ASC Secretariat
Processing feedback into 2 <sup>nd</sup> draft revision	Late August - early September 2015	2 <sup>nd</sup> internal draft revision available	ASC Secretariat
	First half September 2015	Recommendation on 2 <sup>nd</sup> round of public consultation OR not	TWG
Determination if 2 <sup>nd</sup> round of public consultation is needed	Mid September 2015	Decision on 2 <sup>nd</sup> public consultation and period	TAG
Endorse the 2 <sup>nd</sup> draft revision	Late September 2015	Endorsed 2 <sup>nd</sup> draft revision	TAG
2 <sup>nd</sup> round public consultation (if so decided)	Starts on 1.10.2015 until 30.10.2015 <i>This period may be shortened if deemed necessary</i>	Feedback stakeholders	Stakeholders
Processing feedback	October – November 2015	Summary of comments + TWG's reaction to it and list of anonymous organization-based comments published on website	ASC Secretariat

Activity	Deadline	Output	By:
Processing feedback into final revision	First half September <sup>*3</sup> OR first half November 2015 <sup>**4</sup>	Final version for approval	ASC Sec.
	2 <sup>nd</sup> half September <sup>*</sup> OR 2 <sup>nd</sup> half November 2015		TWG
Approve the final draft to become revised standards	Early October <sup>*</sup> OR early December 2015 <sup>**</sup>	Revised standards v 2.0 publicly available	Board +TAG
Adjust Audit Manuals	September - October <sup>*</sup> or December <sup>**</sup> 2015		ASC Secretariat
Developing Training materials	October <sup>*</sup> or December <sup>**</sup> 2015		ASC Secretariat
(re)training internal staff	TBD	Training sessions executed	ASC Secretariat
(re)training trainers	TBD	Training sessions executed	ASC Secretariat
(re)training auditors (including ASI staff)	TBD	Training sessions executed	ASC Secretariat
Transition requirements (for CABs, for farms)	TBD	Requirements published on ASC website.  Announcement sent to relevant stakeholders (direct and via publications in relevant media)	ASC Secretariat

## 8. Decision making procedure

A Technical Working Group (TWG) will be formed according to the decision of the ASC's Supervisory Board (SB) to support the work of the Technical Advisory Group (TAG). The ASC secretariat will coordinate the project throughout. This has been incorporated in the last column of the table in the previous Section – Process of the standards review/revision.

### **TWG's responsibility**

The TWG has the task to:

- Assist the TAG to review the current standards and related logged issues; and,
- Provide inputs into developing an improved system set up with other relevant stakeholders

### **TWG's membership**

- Members of this Technical Working Group are able and willing to share relevant knowledge and expertise on accreditation, certification, and relevant, related issues and will be able to spend sufficient time to support this project.
- Members must demonstrate affinity with the ASC's objectives and the membership of the

<sup>3</sup> \* In case 2<sup>nd</sup> public consultation is not needed

<sup>4</sup> \*\* In case 2<sup>nd</sup> public consultation takes place

Working Group must reflect a balanced representation of areas of relevant expertise and background.

- Approval of committee members will be the responsibility of the ASC Supervisory Board.
- The Working Group will select from among its membership a Chair, who will be the main point of contact to ASC's Standards Director.

#### **Reporting requirements**

- The Chair shall ensure minutes of all proceedings at meetings of the Working Group are kept, including the names of those members of the Working Group present at each such meeting, and all views, advice, recommendations and opinions of the Working Group.
- Chatham House Rules will be applied for all public documents related to this project.

#### **Decision-making procedure**

- The TWG (and its sub-TWGs, if applicable) strives for consensus. If TWG is unable to reach consensus, it will apply the principle of 'majority voting' and will report the different options, the number of votes for each option and a summary of each of the points of view. TWG will share its advice with the TAG. TAG will advise ASC's Supervisory Board (SB) for the SB to take a final decision.

#### **Expenses**

- Upon request and at the explicit discretion of the Secretariat, members of the Working Group may be paid all reasonable travelling, hotel and other expenses properly incurred by them in connection with their attendance at meetings of the Working Group or otherwise in connection with the discharge of their duties.

#### **Meetings**

- The ASC strives to work in a cost and time efficient manner and has a strong preference to work primarily via e.g. teleconference and e-mail. If attendants come from different time zones participants will determine meeting times in such a way that all participants can attend at reasonably convenient times.
- Need for in person meeting(s) will be decided as the process progresses.

### **9. Assessment of risks**

At this very moment the ASC can only identify generic risks in terms of changes to the current standards in case of revision. These risks will be further elaborated once it becomes clearer regarding the direction of proposed changes. This TOR will again be updated accordingly.

#### **Identified risk No 1**

Resistance by audited farms (certified and in assessment) leading to possibility that certified farms would leave the programme due to the changes. Or fewer farms would be willing to join the programme.

Farms would have to adjust their practices to meet changes to the standards, and possibly additional resources used to meet future compliance (e.g. training for workers, efforts to find new inputs suppliers, lower productivity, etc.).

#### **Strategies for managing risk No 1:**

In order to avoid risk No 1, the ASC engages various stakeholders in its standard setting, review and revision processes to make sure that the standards or changes are applicable and accessible.

Besides, the ASC is also committed through other policy developments (e.g. group certification, harmonization and quality and assurance processes) that will be launched soon will also contribute to reducing implementation and certification costs for farmers, especially the small holder.

The ASC is also willing to offer training for farms to raise their awareness of sustainable and responsible farming and reduce impacts of the sector as a whole, providing that funds are available to implement this strategy.

**Identified risk No 2:**

Auditors will need to be retrained to safeguard consistent implementation of any changes. It may prove difficult to have all auditors (re)trained in time, especially if an in-person training is required.

**Strategy for managing risk No 2:**

Development of training materials and planning of training will be planned as far in advance as reasonably expected and may involve on-line delivery.

## 10. Contact information

Project direction : ASC Foundation  
Key contact person : Bas Geerts – Standards Director  
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## 11. Annex

**a.** Comment submitting form

