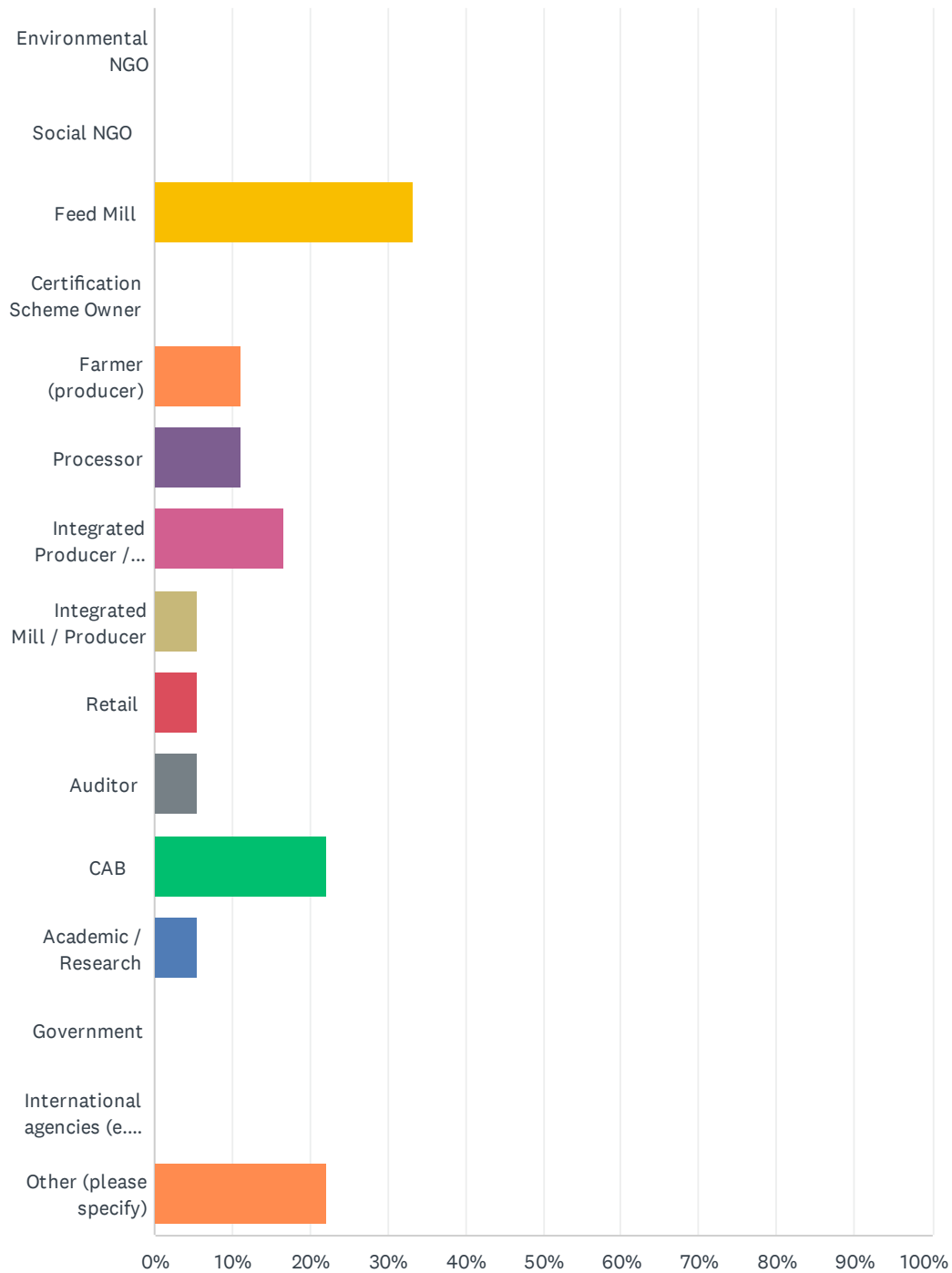


Q3 Sector affiliation (select all that apply):

Answered: 18 Skipped: 1

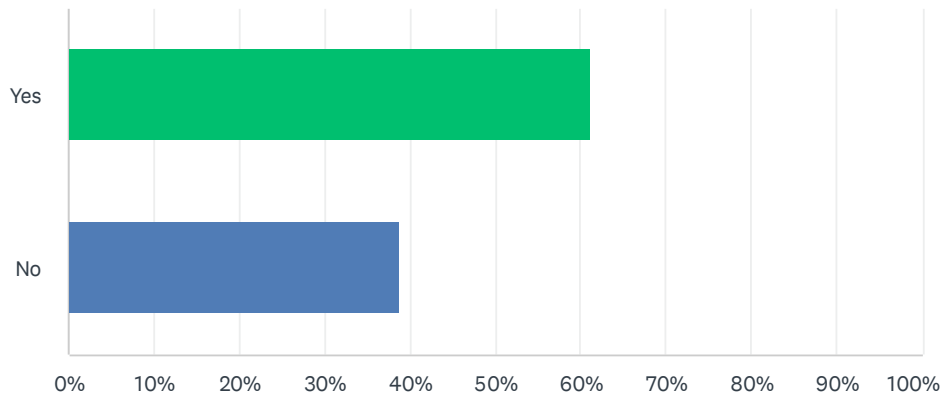


ASC Survey on Feed CAR & RUoC

ANSWER CHOICES	RESPONSES	
Environmental NGO	0.00%	0
Social NGO	0.00%	0
Feed Mill	33.33%	6
Certification Scheme Owner	0.00%	0
Farmer (producer)	11.11%	2
Processor	11.11%	2
Integrated Producer / Processor	16.67%	3
Integrated Mill / Producer	5.56%	1
Retail	5.56%	1
Auditor	5.56%	1
CAB	22.22%	4
Academic / Research	5.56%	1
Government	0.00%	0
International agencies (e.g. UN FAO, OECD)	0.00%	0
Other (please specify)	22.22%	4
Total Respondents: 18		

Q5 I am responding on behalf of my organization:

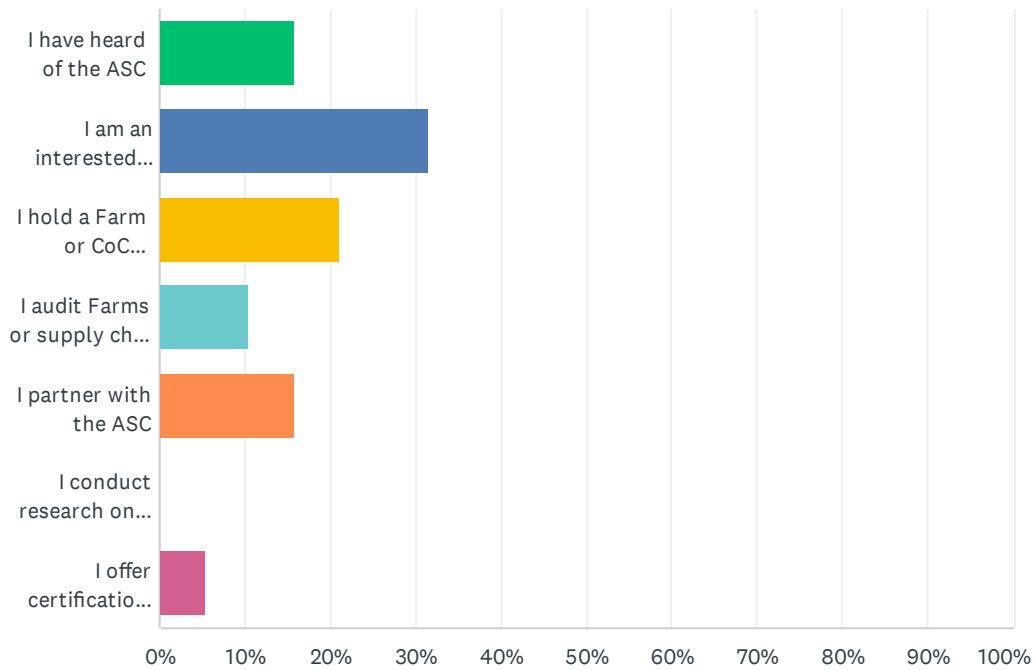
Answered: 18 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	61.11%	11
No	38.89%	7
TOTAL		18

Q6 Familiarity with ASC:

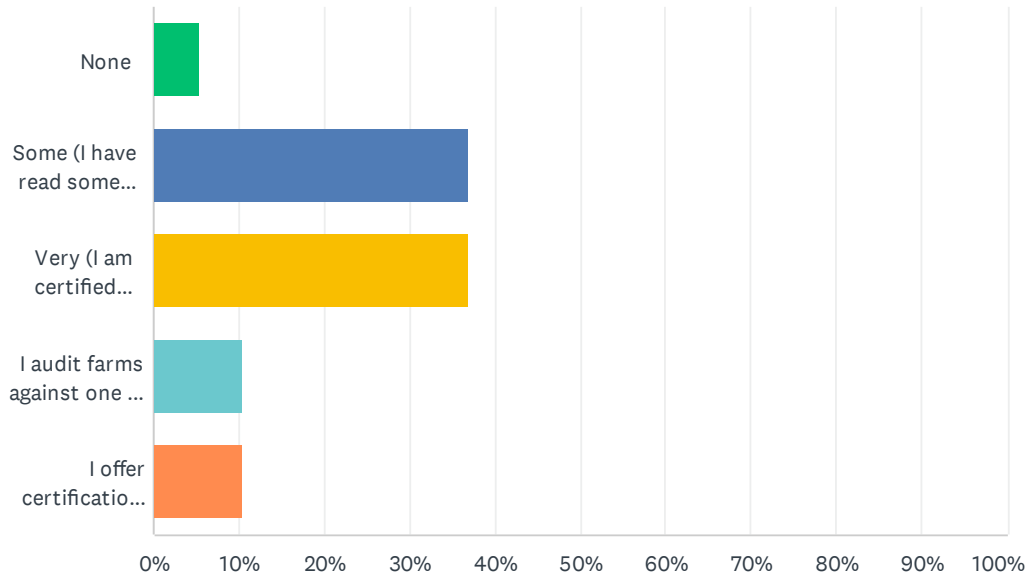
Answered: 19 Skipped: 0



ANSWER CHOICES	RESPONSES	
I have heard of the ASC	15.79%	3
I am an interested stakeholder	31.58%	6
I hold a Farm or CoC certification	21.05%	4
I audit Farms or supply chain actors	10.53%	2
I partner with the ASC	15.79%	3
I conduct research on aquaculture	0.00%	0
I offer certification services	5.26%	1
TOTAL		19

Q7 Familiarity with the ASC Standards:

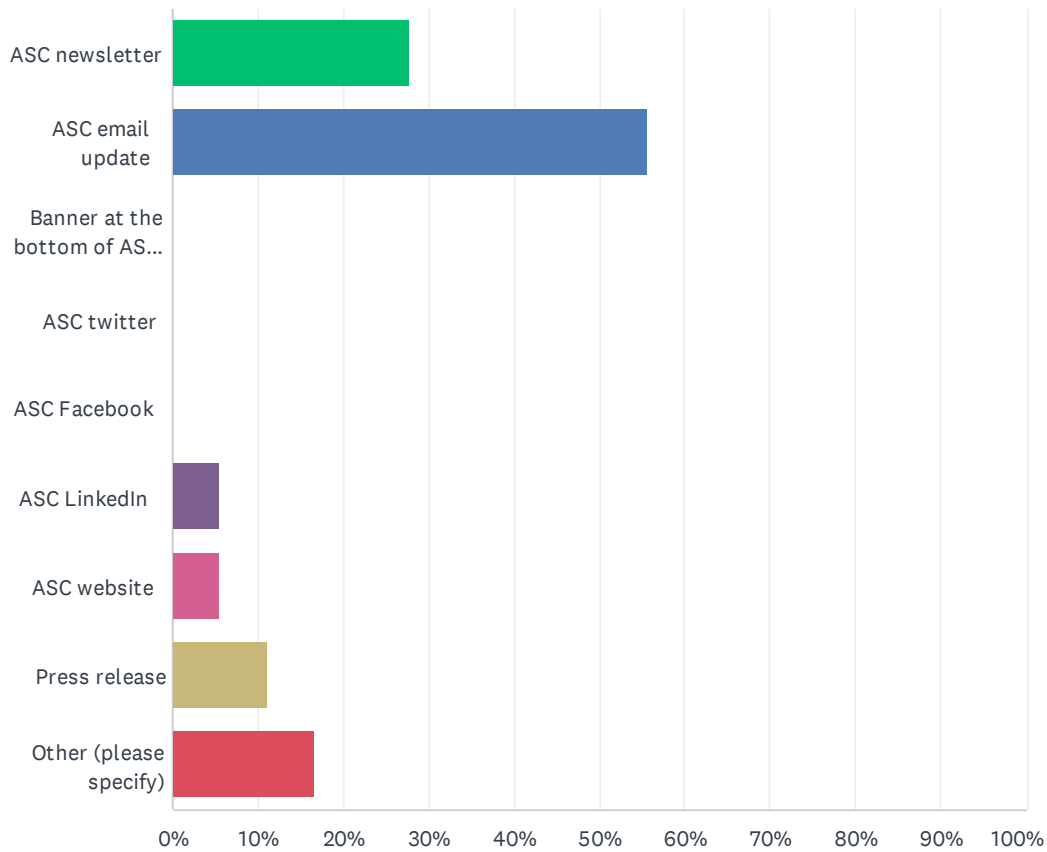
Answered: 19 Skipped: 0



ANSWER CHOICES	RESPONSES	
None	5.26%	1
Some (I have read some aspects of one or more Standards)	36.84%	7
Very (I am certified against one or more standards)	36.84%	7
I audit farms against one or more standards	10.53%	2
I offer certification services	10.53%	2
TOTAL		19

Q10 How did you find out about this public consultations?

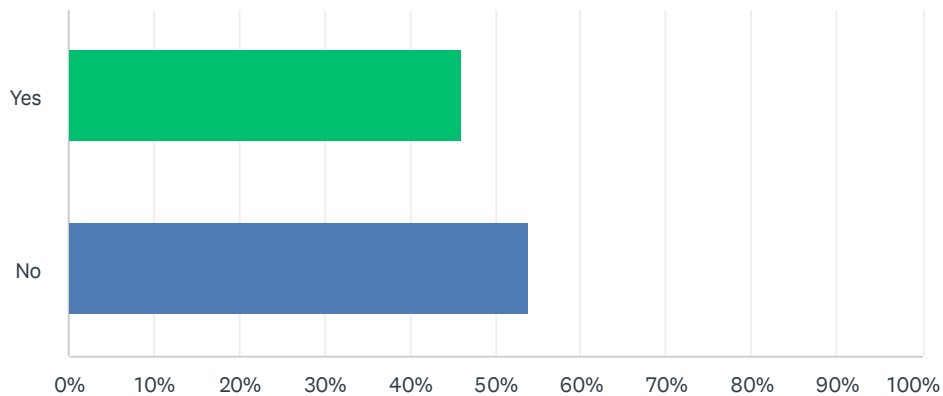
Answered: 18 Skipped: 1



ANSWER CHOICES	RESPONSES	
ASC newsletter	27.78%	5
ASC email update	55.56%	10
Banner at the bottom of ASC emails	0.00%	0
ASC twitter	0.00%	0
ASC Facebook	0.00%	0
ASC LinkedIn	5.56%	1
ASC website	5.56%	1
Press release	11.11%	2
Other (please specify)	16.67%	3
Total Respondents: 18		

Q11 In the RUoC for Feed, section 4.5, there are two approaches for conducting Mass Balance. The ASC Calendar Year: Approach A - The Accounting Period, as per the standard, is January to December and the feed mill can overdraw within that time period as long as they balance the Ingredient Accounting System (i.e. enter more eligible volume) by the end of the Accounting Period. The Continuous Balancing System: Approach B – The feed mill can only enter Eligible Volume into the Ingredient Accounting System in real time, based on the quantity of physical Eligible Ingredients and ASC product at the physical site and can never overdraw volume in the Ingredient Accounting System. Having only one Mass Balance approach – namely, The ASC Calendar Year Approach - would be simpler to maintain and audit. Question: Do you see the need of also having the Approach B: Continuous Balancing approach?

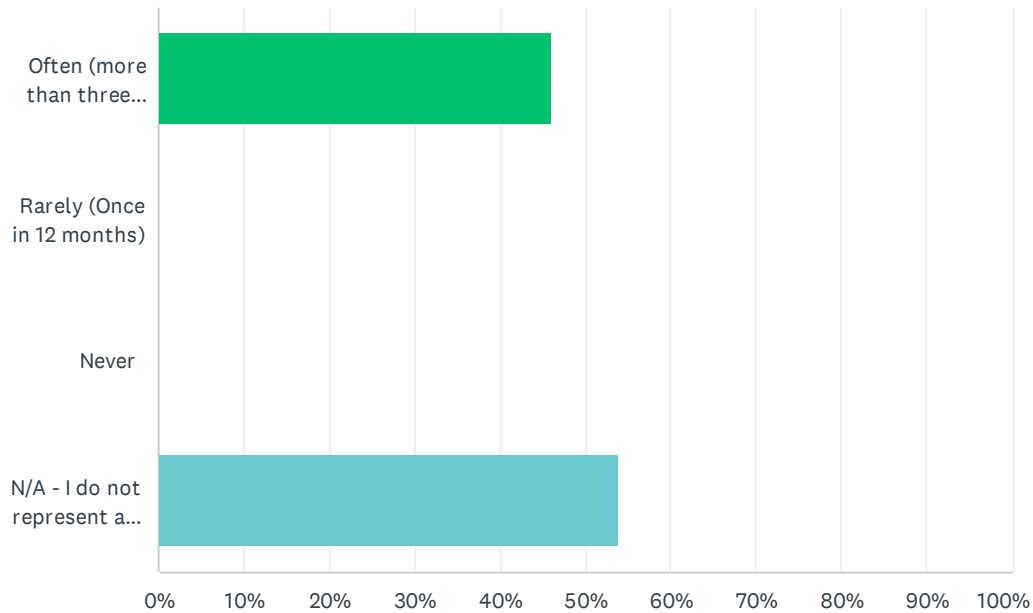
Answered: 13 Skipped: 6



ANSWER CHOICES	RESPONSES	
Yes	46.15%	6
No	53.85%	7
TOTAL		13

Q12 If you represent a feed mill, from your experience, how often might a feed mill 'overdraw' or have planning difficulties due to sourcing issues in a 12-month cycle?

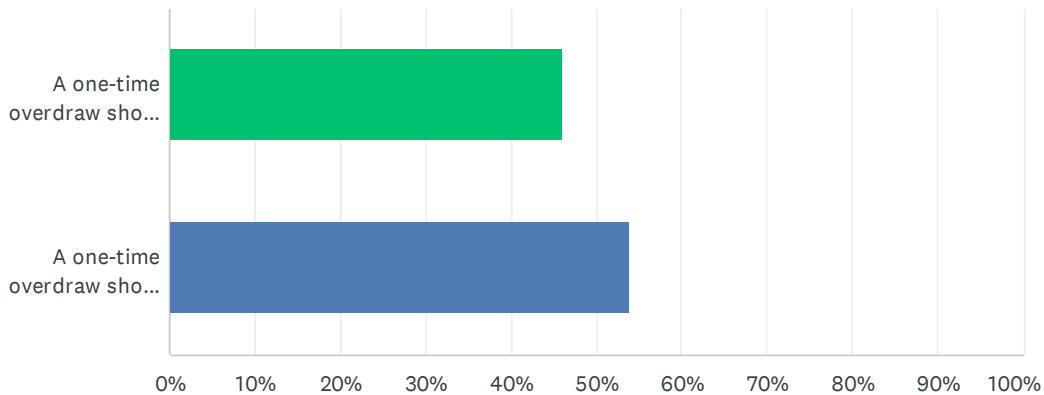
Answered: 13 Skipped: 6



ANSWER CHOICES	RESPONSES	
Often (more than three occasions in 12 months)	46.15%	6
Rarely (Once in 12 months)	0.00%	0
Never	0.00%	0
N/A - I do not represent a feed mill	53.85%	7
TOTAL		13

Q13 For ASC Mass Balance Model - The ASC Calendar Year Approach A:
 Should a one-time overdraw (within one certification cycle) of the Ingredient Accounting System, outside of the 12-month accounting period be permitted to account for uncertainties in forecasting? Rationale for allowing an overdraw : I. Feed mills estimate needs many months in advance and make an order, but these remain estimates. II. With new customers continuously coming into the system, even with a good forecast, the UoC cannot get it exactly right. III. While this is easier for large companies (better forecasting system, more leverage with suppliers, and more room for buffer), this is going to be more difficult for smaller feed mills. Rationale for not allowing an overdraw:I. Mills should have appropriate systems in place to ensure there is sufficient volume of eligible ingredients within the Accounting period e.g.: quarterly review of Ingredient Accounting System Balance.II. Eligible volume can be sought from multiple ingredient types (e.g.: Marine based, plant based etc.) therefore a shortage of one ingredient should not require an overdraw.III. With the Mass Balance Model a clear Accounting Period timeframe is defined and set. Allowing the overdraw adds complication to the process.

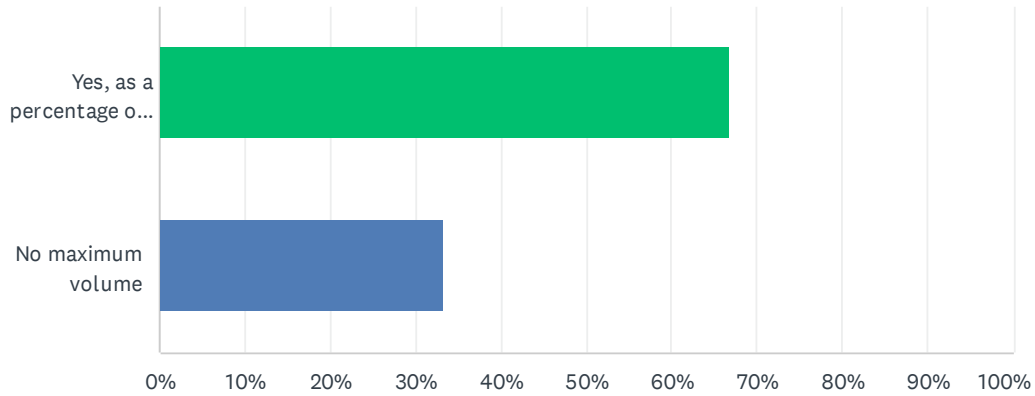
Answered: 13 Skipped: 6



ANSWER CHOICES	RESPONSES	
A one-time overdraw should not be permitted	46.15%	6
A one-time overdraw should be permitted	53.85%	7
TOTAL		13

Q14 If you are in favour of a one-time overdraft, should the maximum volume of one-time overdraft be specified?

Answered: 12 Skipped: 7



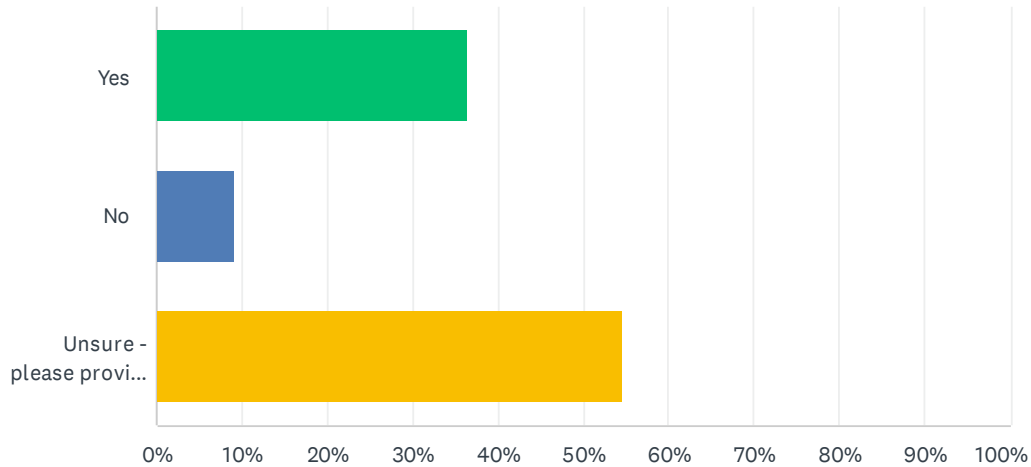
ANSWER CHOICES	RESPONSES	
Yes, as a percentage of the annual eligible volume input	66.67%	8
No maximum volume	33.33%	4
TOTAL		12

Q15 A feed mill can choose to implement both the Mass Balance Model & Segregation Model. This gives the mill the opportunity to produce ASC feed under both models depending on customer needs and the facilities capacity for segregation. If using both Models, the feed mill will need to include all ingredients (eligible and non-eligible) in the ingredient Accounting System and link to the physical product. If you are a CAB: What are the potential challenges for auditing where the Mass Balance and Segregation Models are in use at the same time? Note: Within the Segregation Model, all eligible ingredients are kept physically segregated from all non-eligible Ingredients while under the control of the UoC.

Answered: 8 Skipped: 11

Q16 Related to Q15. If you represent a feed mill: Will current accounting systems be sufficient to capture this information?

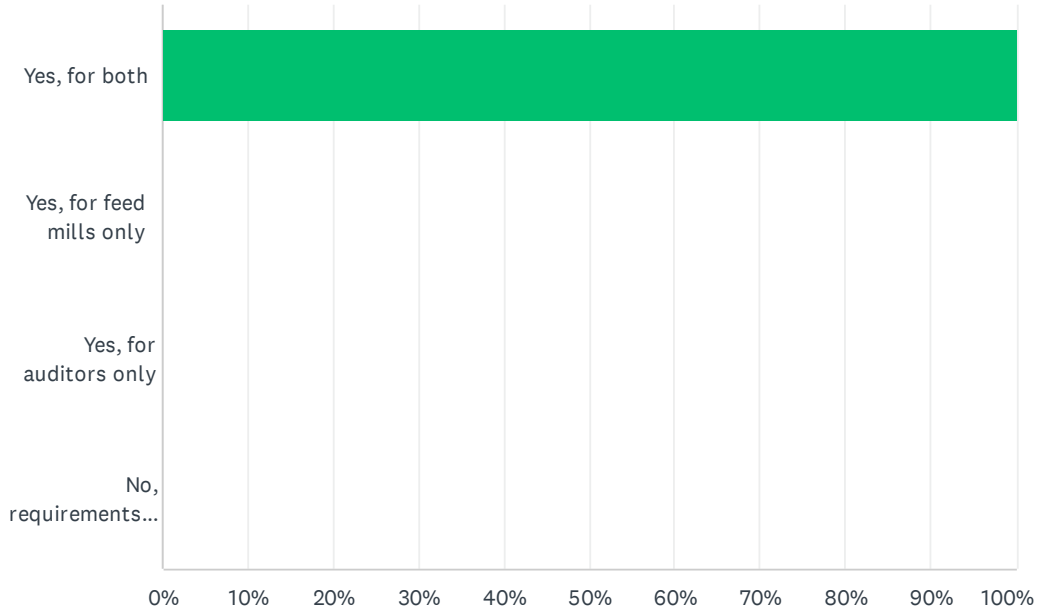
Answered: 11 Skipped: 8



ANSWER CHOICES	RESPONSES	
Yes	36.36%	4
No	9.09%	1
Unsure - please provide detail	54.55%	6
TOTAL		11

Q17 Related to Q15. Do you feel additional guidance will be needed for feed mills and for auditors for instances where both models are in use at the same time?

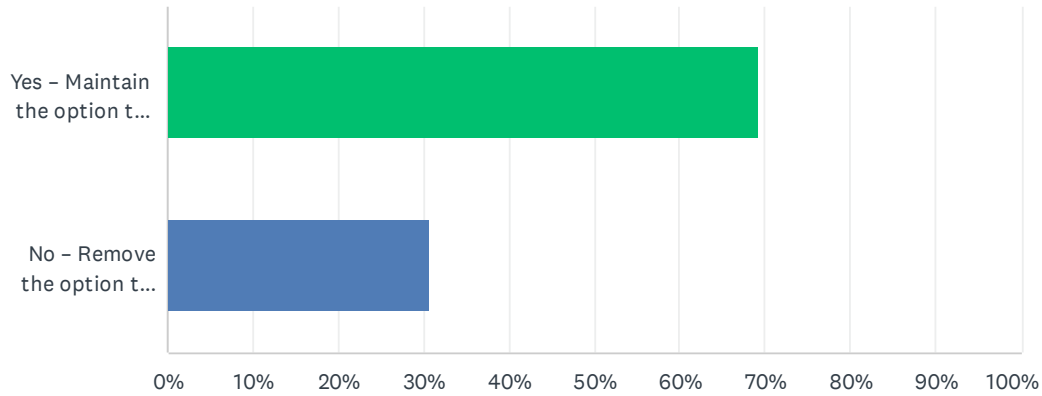
Answered: 11 Skipped: 8



ANSWER CHOICES	RESPONSES	
Yes, for both	100.00%	11
Yes, for feed mills only	0.00%	0
Yes, for auditors only	0.00%	0
No, requirements are clear	0.00%	0
TOTAL		11

Q18 Related to Q15. Do you support the option to implement both models?

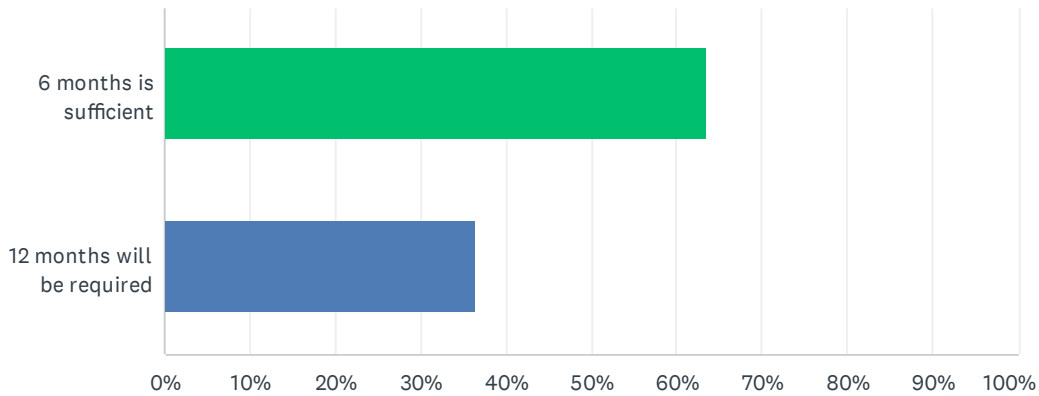
Answered: 13 Skipped: 6



ANSWER CHOICES	RESPONSES	
Yes – Maintain the option to run both models	69.23%	9
No – Remove the option to run both	30.77%	4
TOTAL		13

Q19 From the RUoC (4.3.1.3 d):In exceptional cases where an ingredient is retrospectively determined to be eligible, this volume shall be entered into the Ingredient Accounting System as eligible but only after evidence is available to demonstrate its eligibility and that it was received within the Accounting Period.Question: What is a reasonable timeframe or cut off to retrospectively determine an ingredient as eligible?Do you consider 6 months sufficient or will this need to be longer for example with Marine Ingredients where Fish Meal/ Fish Oil declaration as to certifications status of ingredients supplied could be annual.

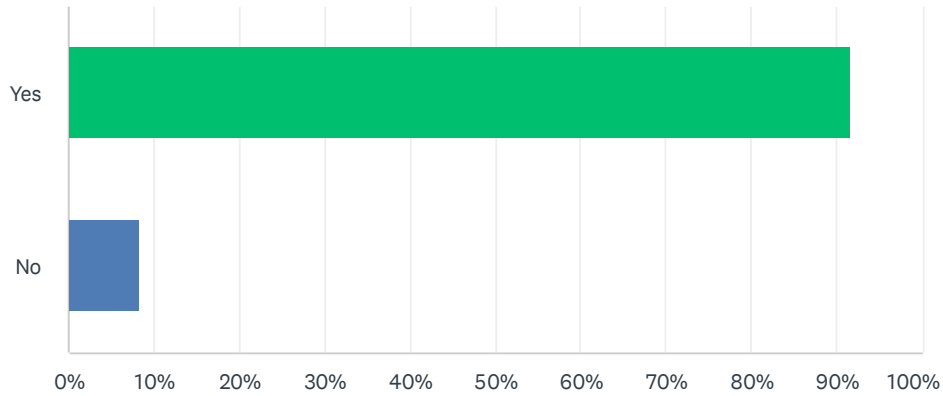
Answered: 11 Skipped: 8



ANSWER CHOICES	RESPONSES
6 months is sufficient	63.64% 7
12 months will be required	36.36% 4
TOTAL	11

Q20 Are there circumstances where the product recipe / formula will include a percentage range (e.g.: 10-15% of any specific ingredient)

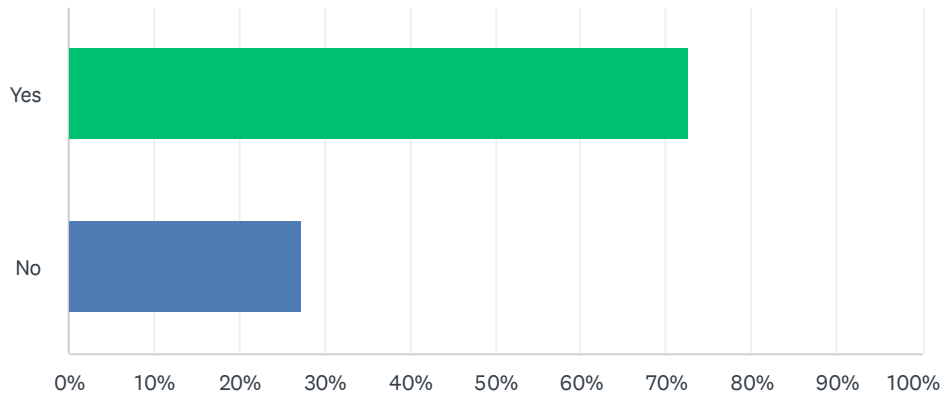
Answered: 12 Skipped: 7



ANSWER CHOICES	RESPONSES	
Yes	91.67%	11
No	8.33%	1
Total Respondents: 12		

Q21 Related to Q20. From your experience, do you consider the 'range' mentioned above will have an impact on Mass Balance Model or Segregation Model volume reconciliation?

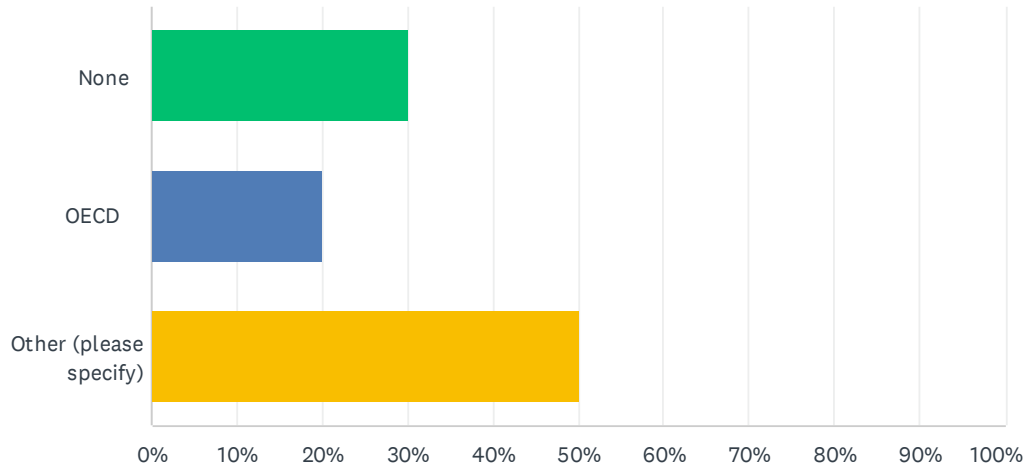
Answered: 11 Skipped: 8



ANSWER CHOICES	RESPONSES	
Yes	72.73%	8
No	27.27%	3
TOTAL		11

Q22 What Due Diligence framework (if any) does your company implement / comply with?

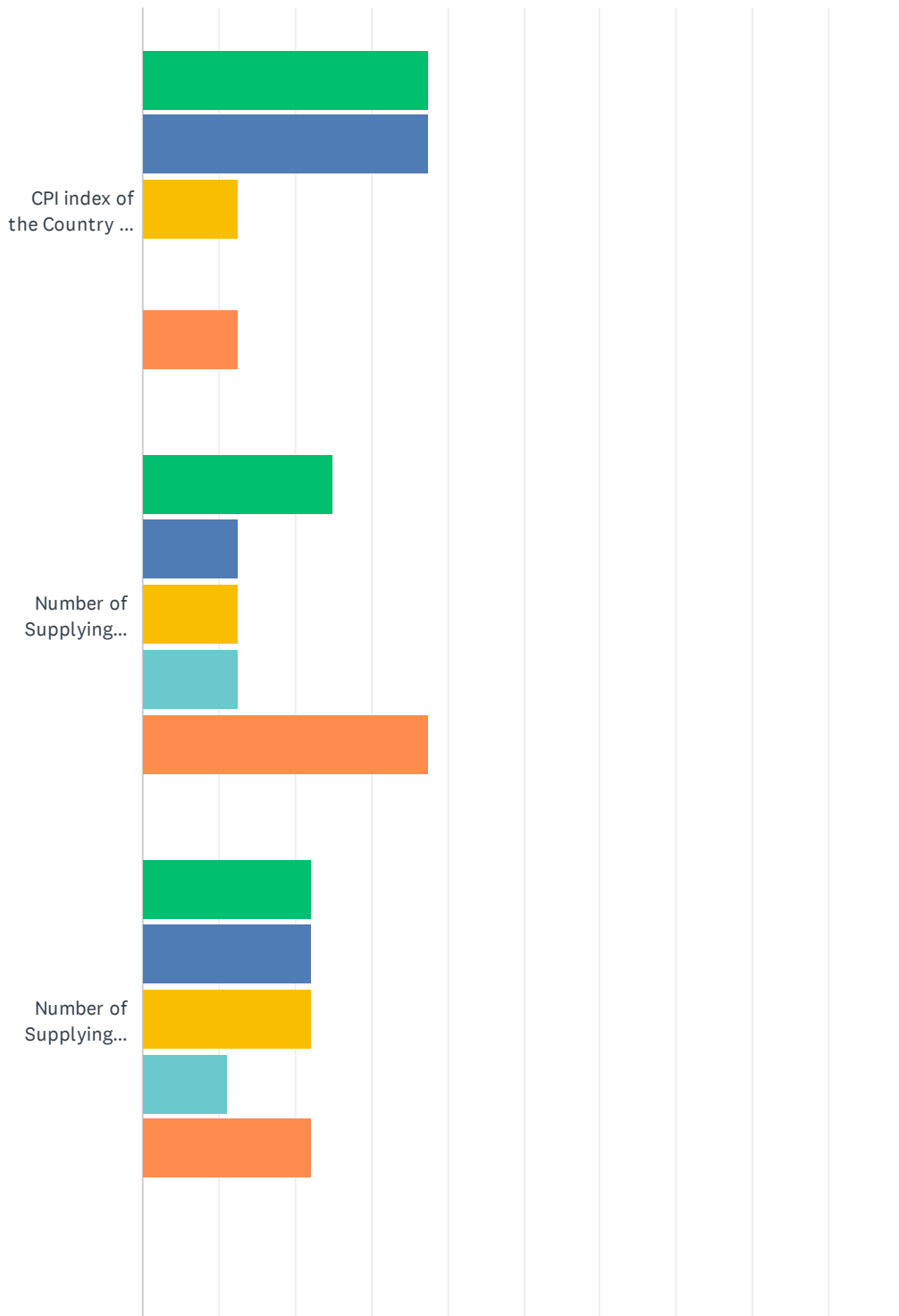
Answered: 10 Skipped: 9



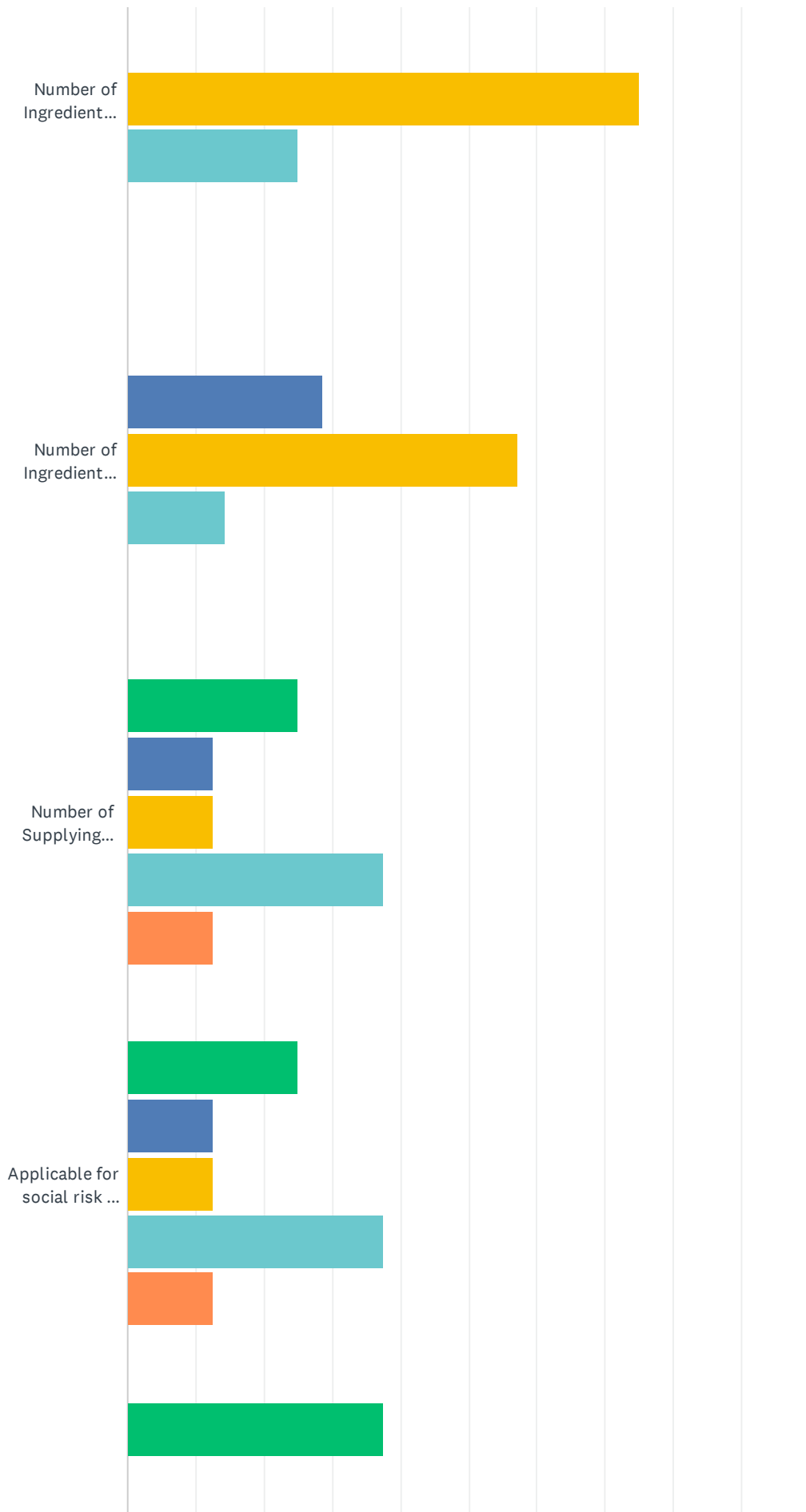
ANSWER CHOICES	RESPONSES	
None	30.00%	3
OECD	20.00%	2
Other (please specify)	50.00%	5
TOTAL		10

Q23 Sampling of Due Diligence assessments: At desk audit review stage the auditor will be required to sample a selection of Due Diligence assessments for review. The sampling methodology will be based on risk. Please rank the risk factors below in order of what you consider are more important (i.e. from highest risk to lowest risk):

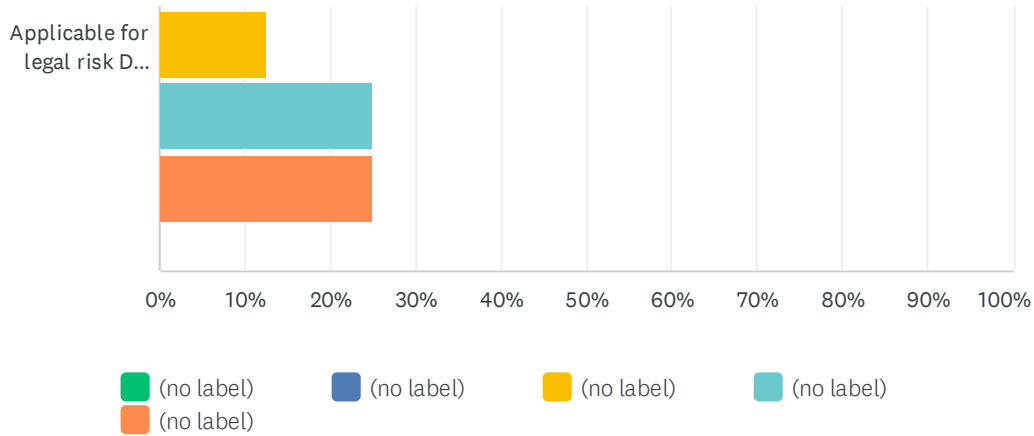
Answered: 9 Skipped: 10



ASC Survey on Feed CAR & RUoC



ASC Survey on Feed CAR & RUoC



	(NO LABEL)	(NO LABEL)	(NO LABEL)	(NO LABEL)	(NO LABEL)	TOTAL	WEIGHTED AVERAGE
CPI index of the Country the UoC is located in	37.50% 3	37.50% 3	12.50% 1	0.00% 0	12.50% 1	8	2.13
Number of Supplying Ingredient Manufacturers	25.00% 2	12.50% 1	12.50% 1	12.50% 1	37.50% 3	8	3.25
Number of Supplying Ingredient Manufacturers from CPI high risk countries	22.22% 2	22.22% 2	22.22% 2	11.11% 1	22.22% 2	9	2.89
Number of Ingredient manufacturers determined to be low risk via Path way 2 (Sector Assessment)	0.00% 0	0.00% 0	75.00% 6	25.00% 2	0.00% 0	8	3.25
Number of Ingredient manufacturers determined to be low risk via Path way 3 (Ingredient Manufacturer Assessment)	0.00% 0	28.57% 2	57.14% 4	14.29% 1	0.00% 0	7	2.86
Number of Supplying Ingredient Manufacturers to confirm valid certification for Ingredient	25.00% 2	12.50% 1	12.50% 1	37.50% 3	12.50% 1	8	3.00
Applicable for social risk Due Diligence: ASC social country risk category	25.00% 2	12.50% 1	12.50% 1	37.50% 3	12.50% 1	8	3.00
Applicable for legal risk Due Diligence: WGI (Worldwide Governance Indicators) risk factor	37.50% 3	0.00% 0	12.50% 1	25.00% 2	25.00% 2	8	3.00

Q24 Related to Q23. Are there any other risk factors that should be considered?

Answered: 7 Skipped: 12

Q25 In regard to the sub-national / sector assessment described in pathway 2 of the Standard, can you provide any insight into how this could be implemented?

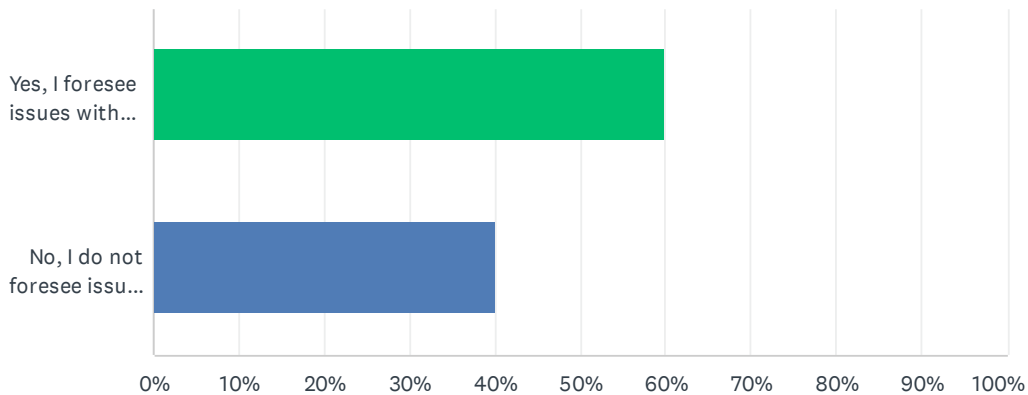
Answered: 5 Skipped: 14

Q26 Related to Q25. What challenges can you foresee that will be encountered?

Answered: 5 Skipped: 14

Q27 RUoC Section 4 Ingredient Approval process:4.2.1 The applicant and/or certificate holder shall implement documented procedures with clearly defined responsibilities for processes specific to its supply chains and their risks. The procedures shall include but not be limited to the following:4.2.1.1 Processes to maintain up-to-date supply chain mapping for all ingredients that represent >1% of the total annual ingredient-weight (volume) received by the applicant/certificate holder for use in aqua feedsIn regard to the requirement above, do you foresee any issues with Feed Mills providing the auditor with their supply chain information?Note: All auditors sign confidentiality and Code of Conduct agreements and specific supplier detail will not be made public in the audit report.

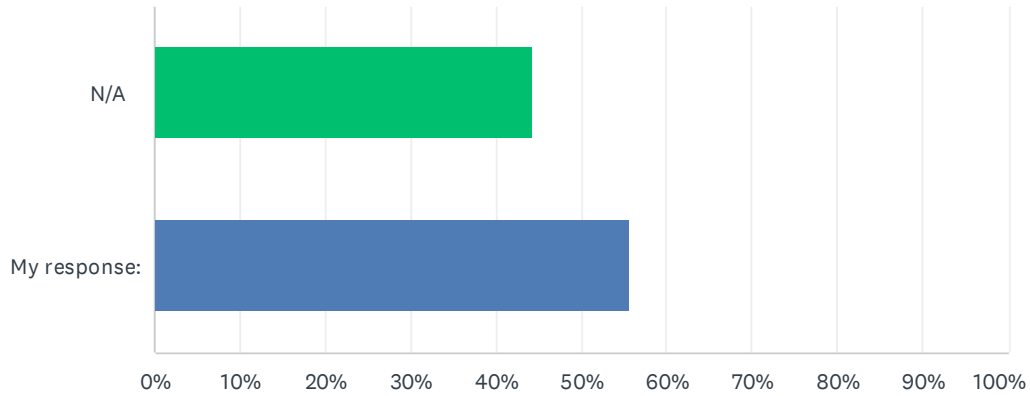
Answered: 10 Skipped: 9



ANSWER CHOICES	RESPONSES	
Yes, I foresee issues with providing supply chain information	60.00%	6
No, I do not foresee issues providing supply chain information	40.00%	4
TOTAL		10

Q28 If you answered yes to Q27 above, please provide a reason for your answer and any potential solutions.

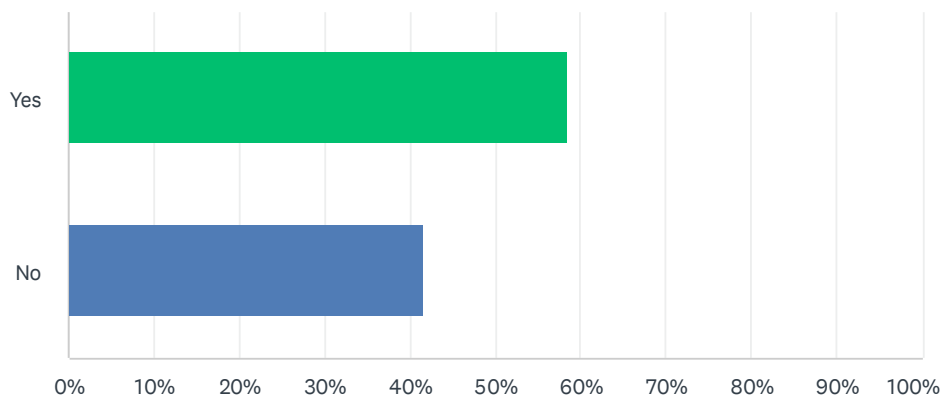
Answered: 9 Skipped: 10



ANSWER CHOICES	RESPONSES	
N/A	44.44%	4
My response:	55.56%	5
Total Respondents: 9		

Q29 In the Feed CAR, section 21.6, the circumstances listed below will result in a Critical non-conformance:a) Sales of non-ASC products as ASC compliant product.b) Sale of Non-eligible ingredients within an ASC product produced under the ASC Segregation Production Model.c) The Ingredient Accounting System is demonstrated to be overdrawn at 2 consecutive audits.Do you agree with this proposal?Note on implication of a critical non-conformance: First circumstance: if at initial audit, the critical non-conformity shall be closed within 3 months and before granting certification; Second circumstance: if during the period of validity of a certificate, the certificate shall be suspended and the critical non-conformity closed within 3 months, if not closed by then, the certificate shall be withdrawn.

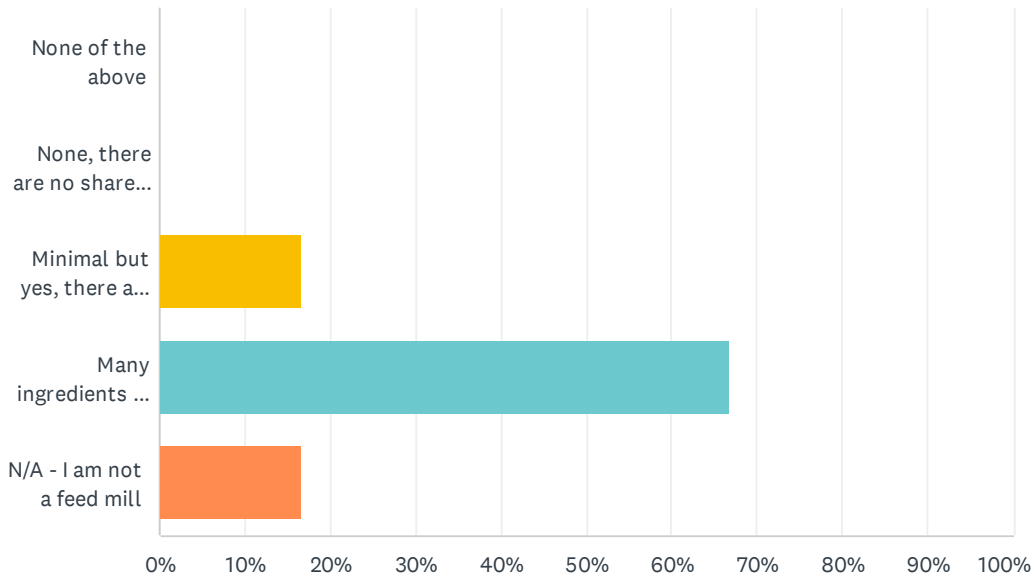
Answered: 12 Skipped: 7



ANSWER CHOICES	RESPONSES	
Yes	58.33%	7
No	41.67%	5
TOTAL		12

Q30 If you represent a feed mill that is producing both aqua feed and non-aqua feed (e.g. livestock feed) at the same facility, are there many shared feed ingredients that may be used in both product types?

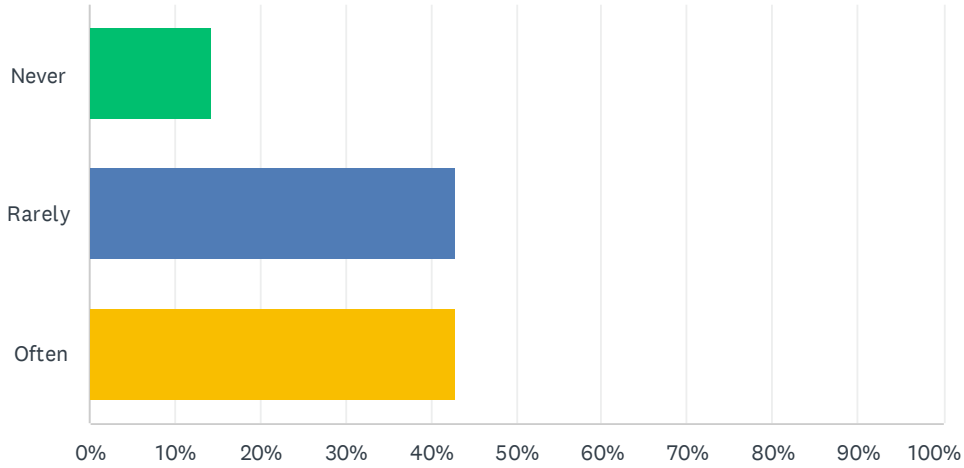
Answered: 6 Skipped: 13



ANSWER CHOICES	RESPONSES
None of the above	0.00% 0
None, there are no shared ingredients between aqua feed and non-aqua feed	0.00% 0
Minimal but yes, there are shared ingredients	16.67% 1
Many ingredients are shared	66.67% 4
N/A - I am not a feed mill	16.67% 1
TOTAL	6

Q31 Subcontracted feed manufacture: Are there situations where a feed mill produces feed for another entity? (i.e. without taking ownership of the product they are manufacturing.)

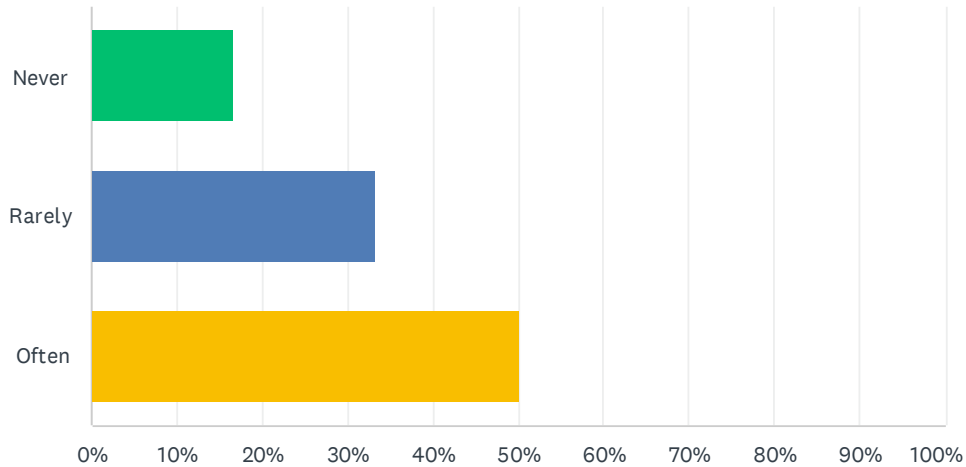
Answered: 7 Skipped: 12



ANSWER CHOICES	RESPONSES	
Never	14.29%	1
Rarely	42.86%	3
Often	42.86%	3
TOTAL		7

Q32 Are there situations where a feed mill uses contract manufacturers or repackers to handle or transform product still under their ownership?

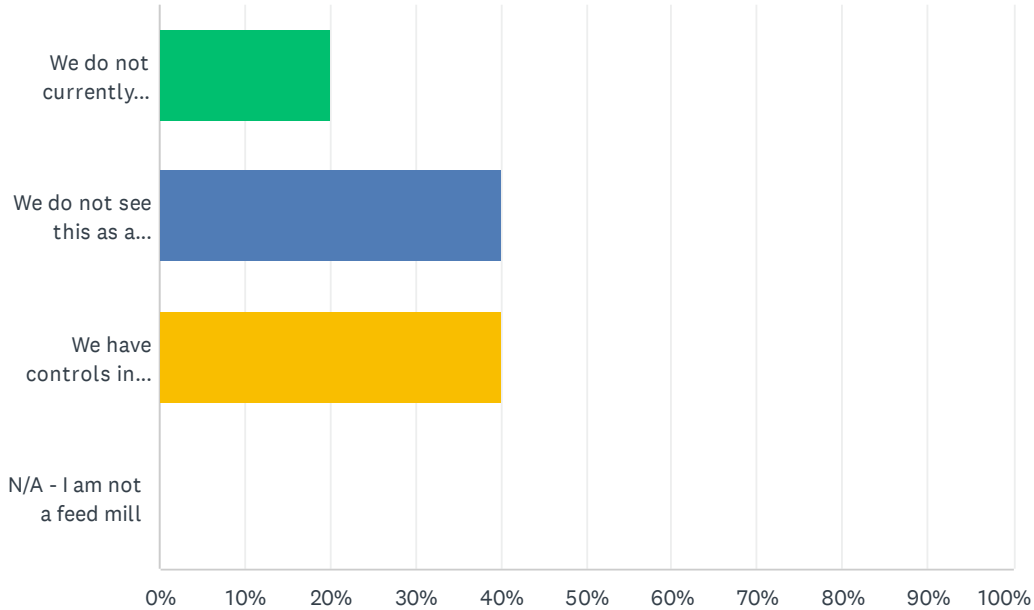
Answered: 6 Skipped: 13



ANSWER CHOICES	RESPONSES
Never	16.67% 1
Rarely	33.33% 2
Often	50.00% 3
TOTAL	6

Q33 If you represent a feed mill: How can you assure that feed bags would not be misused e.g.: ASC product bags re-used, repacked with non-ASC feed and sold a second time as ASC?

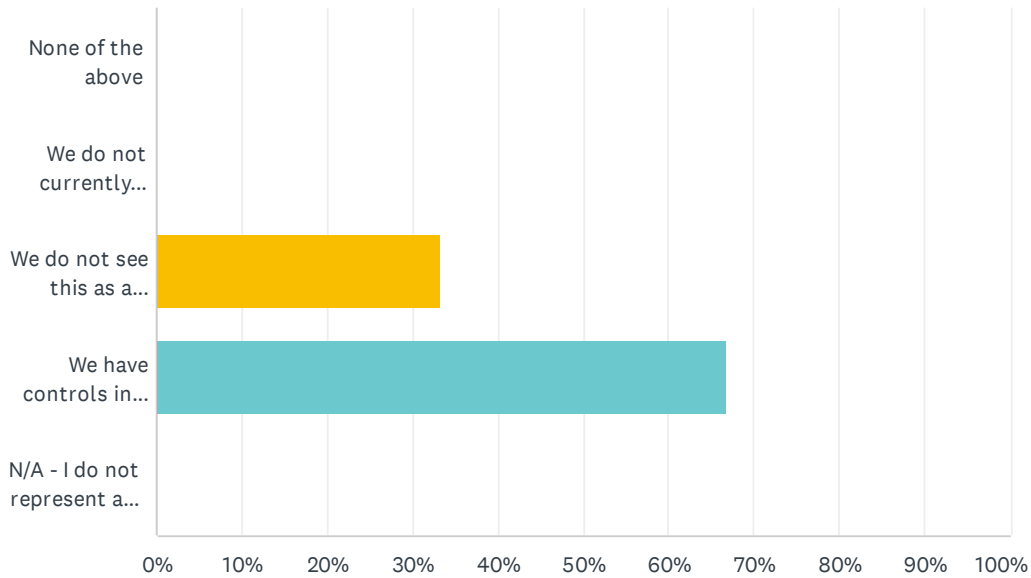
Answered: 5 Skipped: 14



ANSWER CHOICES	RESPONSES	
We do not currently consider this a risk, but may reassess	20.00%	1
We do not see this as a significant risk that requires consideration	40.00%	2
We have controls in place to mitigate this risk	40.00%	2
N/A - I am not a feed mill	0.00%	0
TOTAL		5

Q34 If you represent an ASC farm, after feed has been used, how do you dispose the empty feed bags responsibly to ensure they are not misused (e.g.: reused / repacked with non-ASC feed and sold a second time).

Answered: 3 Skipped: 16



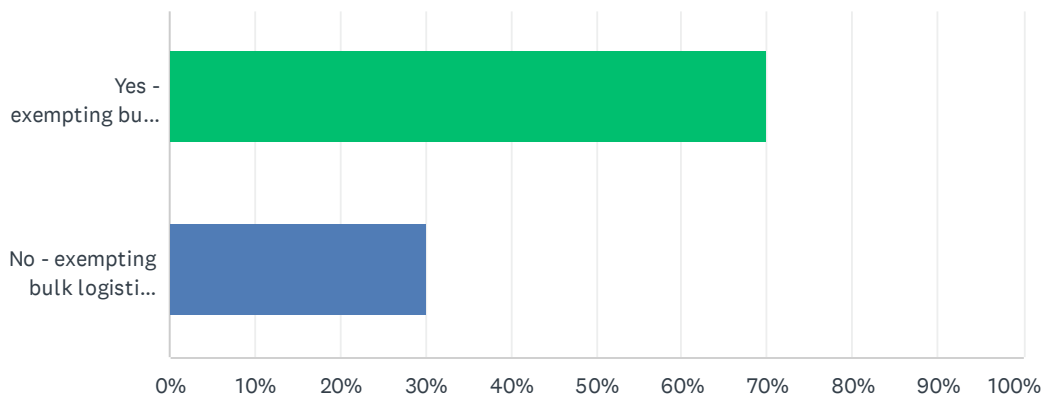
ANSWER CHOICES	RESPONSES
None of the above	0.00% 0
We do not currently consider this risk, but may reassess	0.00% 0
We do not see this as a significant risk that requires consideration	33.33% 1
We have controls in place to mitigate this risk	66.67% 2
N/A - I do not represent a farm	0.00% 0
TOTAL	3

Q35 Related to Q33 or Q34 above, please provide any additional examples of controls in place to manage the risk of ASC feed bags being re-used

Answered: 3 Skipped: 16

Q36 RUoC Requirement 21.5 The Client shall clearly identify all ASC products, both physically for sealed feed bags, as well on associated sales documents for all feed, indicating the Production Model applied. (i.e. Segregation or Mass Balance). Note: the quote above refers to sold ASC feed product.
Question: Would exempting bulk logistics (tankers or silos), from the requirement for physical identification pose too much risk in terms of substitution and cross contamination? E.g.: identify product as ASC feed via coding rather than physical identification.

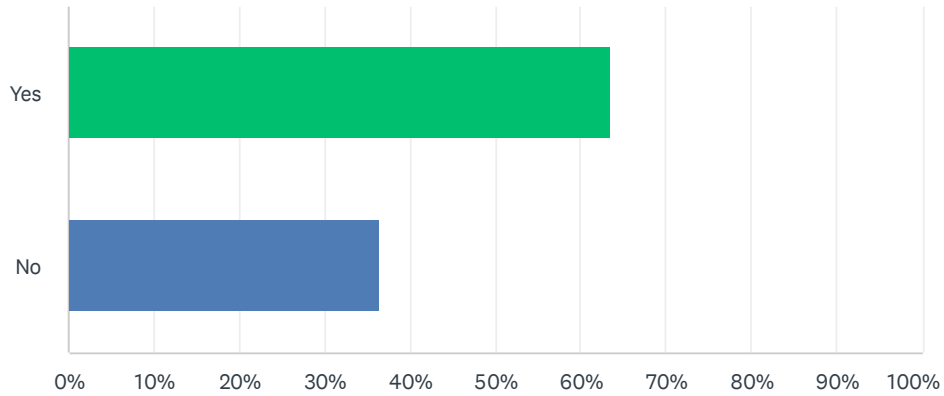
Answered: 10 Skipped: 9



ANSWER CHOICES	RESPONSES	
Yes - exempting bulk logistics (tankers or silos) from the requirement will pose too much risk	70.00%	7
No - exempting bulk logistics (tankers or silos) from the requirement will not pose a risk	30.00%	3
TOTAL		10

Q37 Related to Q36. Do you feel physical identification of sealed bags for ASC feed product is implementable?

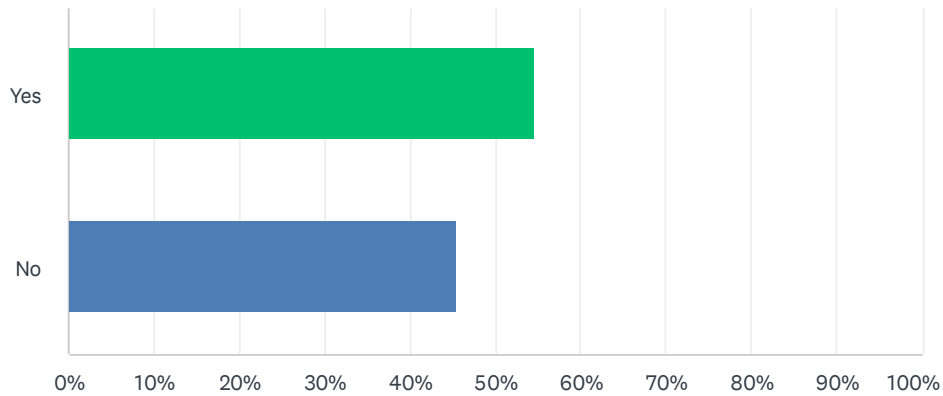
Answered: 11 Skipped: 8



ANSWER CHOICES	RESPONSES	
Yes	63.64%	7
No	36.36%	4
TOTAL		11

Q38 RUoC Requirement 21.9 In cases where the Client sells ASC product to an entity other than directly to an ASC certified farm, e.g. trader or distributor, the Client: 1. Shall pack ASC product with tamper proof & traceable labels or seals (i.e. a label or seal with a traceable identification which is destroyed when the container or bag is opened). 2. Shall have a mechanism to prevent the entity from misusing the client’s name or re-use of the client’s packaging. 3. Should obtain written commitment from the entity that they will not permit misuse or tampering of the ASC product while in their ownership. Question: Are the above requirements feasible?

Answered: 11 Skipped: 8



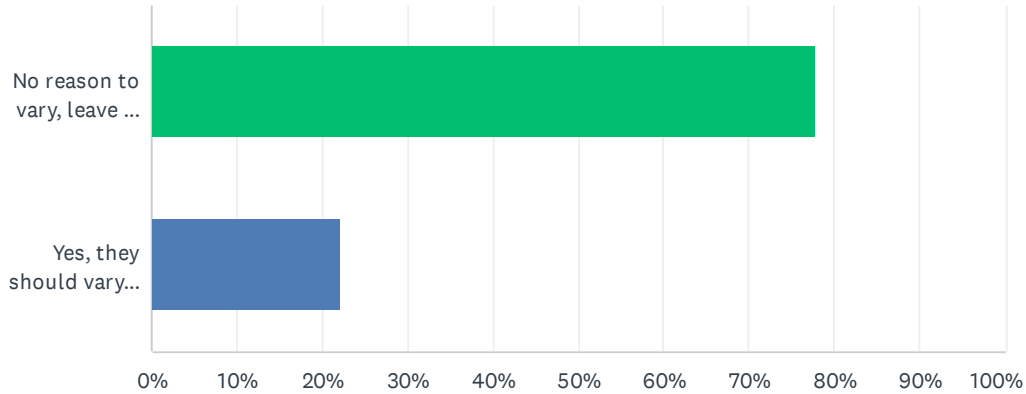
ANSWER CHOICES	RESPONSES	
Yes	54.55%	6
No	45.45%	5
TOTAL		11

Q39 Under some other sustainability standards, plant based biofuel ingredients must be accounted for every 3 months. Can you provide details of any other regulations or specific characteristics on feed ingredients that may have a limited timeframe for validity?

Answered: 4 Skipped: 15

Q40 Reporting timelines in Annex C of the Feed CAR are proposed to be in line with the Farm Standard CAR. Are there any reasons why reporting deadlines need to vary from those currently in place for the Farm Standard CAR?

Answered: 9 Skipped: 10



ANSWER CHOICES	RESPONSES	
No reason to vary, leave the same for simplicity and consistency	77.78%	7
Yes, they should vary from the farm standard	22.22%	2
TOTAL		9

Q41 On review of the CAR & RUoC documents, what topics or requirements in particular do you consider may need additional guidance?

Answered: 4 Skipped: 15

Q42 Please feel free to add here any other additional comments:

Answered: 5 Skipped: 14