



ASC Pike-perch Module

# Stakeholder Consultation Summary Report

March – April 2023



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*This report refers to ongoing policy development  
not ASC's final policy or position.*

# 1 Background

Currently, ASC manages 11 species-specific farm standards that cover environmental and social aspects of aquaculture operations. As they have been developed at different times, their requirements vary on some of the impacts that are common across aquaculture. For this reason, ASC is developing an aligned Farm Standard, which aims to provide greater consistency and harmonise requirements across all farmed seafood species currently certifiable against ASC standards. The ASC Farm Standard is expected to become effective in 2025 and in the first version will cover the 17 species groups currently certifiable against the ASC standards.

New species are going to be added to the ASC Programme based on consumer demand, market development opportunities, or producer interest. In 2021 a number of species were approved by the Board for consideration, including: *Clarridae spp.*, *Ictalurus spp.*, *Scortum barcoo*, *Percoidea spp.*, *Sander spp.*, and *Silurus glanis*.

Among the selected species, pike-perch (*Sander lucioperca*) was identified as a priority species for ASC. [The Species Extension Project: Pike-perch](#) seeks to develop a module which will allow expansion to the portfolio of species currently covered by ASC. This module is being developed with existing indicators from some of the 11 species-specific standards.

The module will be an interim measure to allow for certification of *Sander lucioperca* until the release of the ASC Farm Standard. Producers will need to transition to the aligned ASC Farm Standard when it becomes effective.

## 1.1 Consultation Objectives

The objectives of this public consultation were to gather feedback on the following topics:

- Relevance of the language of Freshwater Trout Standard, indicators 2.3.1, 2.4.1 for the assessment of pike-perch production,
- Counting technology or methods used in pike-perch stocking and harvesting,
- Commercially available vaccines used in pike-perch aquaculture,
- Fishmeal and fish oil inclusion in pike-perch diets, as well as FCR values and
- General feedback on the relevance and completeness of the selected indicators for assessing the culture of pike-perch in addition to the current ASC Freshwater Trout Standard (and additional indicators from other standards)

## 1.2 Approach

ASC is committed to transparency, aiming to ensure stakeholders can understand the rationale for decisions on standards content. In addition to this summary of feedback, ASC will publish all comments received. To ensure stakeholders were able to provide full and open feedback, ASC does not attribute comments to individuals or organisations. ASC does not accept anonymous submissions.

ASC offered several ways for stakeholders to provide feedback during the consultation:

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

ASC employed several methods to engage stakeholders and increase accessibility:

- Direct engagement via Mailchimp campaign (e-mail sent out to 4474 recipients) and ASC newsletters (999 subscribers);
- Personal emails by ASC staff (69 individuals);
- Social media communication with links to ASC webpage (LinkedIn and Twitter)
- Slide decks on the module;
- Short explanatory video on the ASC Pike-perch Module draft and consultation;
- Consultation questions overview document;
- Release of accompanying documents such as FAQs

## 2. Participation

The focus of this stakeholder consultation was to engage those whose expertise and viewpoints are crucial to ensure the credibility of the ASC Pike-perch Module. Within the identified 13 key stakeholder categories five priority stakeholder groups were identified:

- Academia/Research
- Environmental and social NGO
- Farm (producer) or association thereof (non-certified)
- Feed mills
- Governments/Regulating bodies

In total, there were 16 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 24 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*                                      |
|-------------------------------------|---------------------|---|
| <b>Online survey</b>                | 10 responses        | 10 organisations / independent individuals        |
| <b>Webinars/workshops</b>           | 9 responses         | 7 organisations / independent individuals         |
| <b>1:1 meetings and phone calls</b> | 2 responses         | 2 organisations / independent individuals         |
| <b>Emailed feedback</b>             | 3 responses         | 3 organisations / independent individuals         |
| <b>TOTAL</b>                        | <b>24 responses</b> | <b>16 organisations / independent individuals</b> |

Table 1: Overall participation in the stakeholder consultation on the ASC Pike-perch Module.

*\*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 one online public workshop and two targeted feedback workshops on the content and language used in the ASC Pike-perch Module with stakeholders from different sectors and regions. There were 10 participants in total. People who participated in multiple workshops are counted once. Workshops proved to be the most effective method to generate feedback for most stakeholder groups.

## 2.1 Progress against participation goals

The level of feedback from priority stakeholders was acceptable. The table below shows number of respondents per priority stakeholder group:

| Stakeholder Group   | Feedback Targets | Respondents |
|---|------------------|-------------|
| Academia/Research   | 1                | 2           |
| Environmental and social NGOs                             | 5                | 1           |
| Farms (producers) or associations thereof (non-certified) | 5                | 8           |
| Feed mills  | 3                | 2           |
| Primary processors or associations thereof                | -                | 2           |
| Retailers/Brands or associations thereof                  | 5                | 2           |
| <b>TOTAL</b>  | -                | 16          |

Table 2: Number of respondents per stakeholder group.

\* One of the farms (producers) is also a primary processor.

The table below shows the feedback target and actual respondent numbers.

Feedback targets were reached for the following stakeholder groups:

- Academia/Research
- Environmental and social NGOs
- Farms (producers) or associations thereof (non-certified)
- Primary processors or associations thereof – not targeted

In the case of environmental and social NGOs, the feedback collected was significantly higher than expected. The one organisation that provided feedback is representative of multiple global groups involved in animal welfare. The feedback received therefore, met the intent of the target. In the case of farms (producers) or associations of non-certified producers, it was challenging to collect feedback from non-certified producers in regions and countries with no ASC presence (i.e. Kazakhstan, Uzbekistan, Algeria and Tunisia). The feedback received from this group is limited to European RAS and aquaponic pike-perch producers. Nonetheless, the engagement of the European Percid Fish Culture group was very valuable. Primary processors were not targeted in this

consultation; however, feedback was also gratefully received from this target group.

Feedback targets that were not met were for feed mills and retailers. There are only three well-known pike-perch specific feed producers, therefore the participation of almost all the players in this sector was reached. Retailers/brands are the sole underrepresented group in the stakeholder consultation. Given the nature of the feedback needed, the feedback received from retailers is considered sufficient. In this case, retailers showed interest in the inclusion of pike-perch to the ASC scope but their feedback in this consultation is not essential for the development of the module. Geographically, Europe was well represented within this consultation. Feedback was also received from some stakeholders covering the Middle East and Asia that were targeted in this consultation.

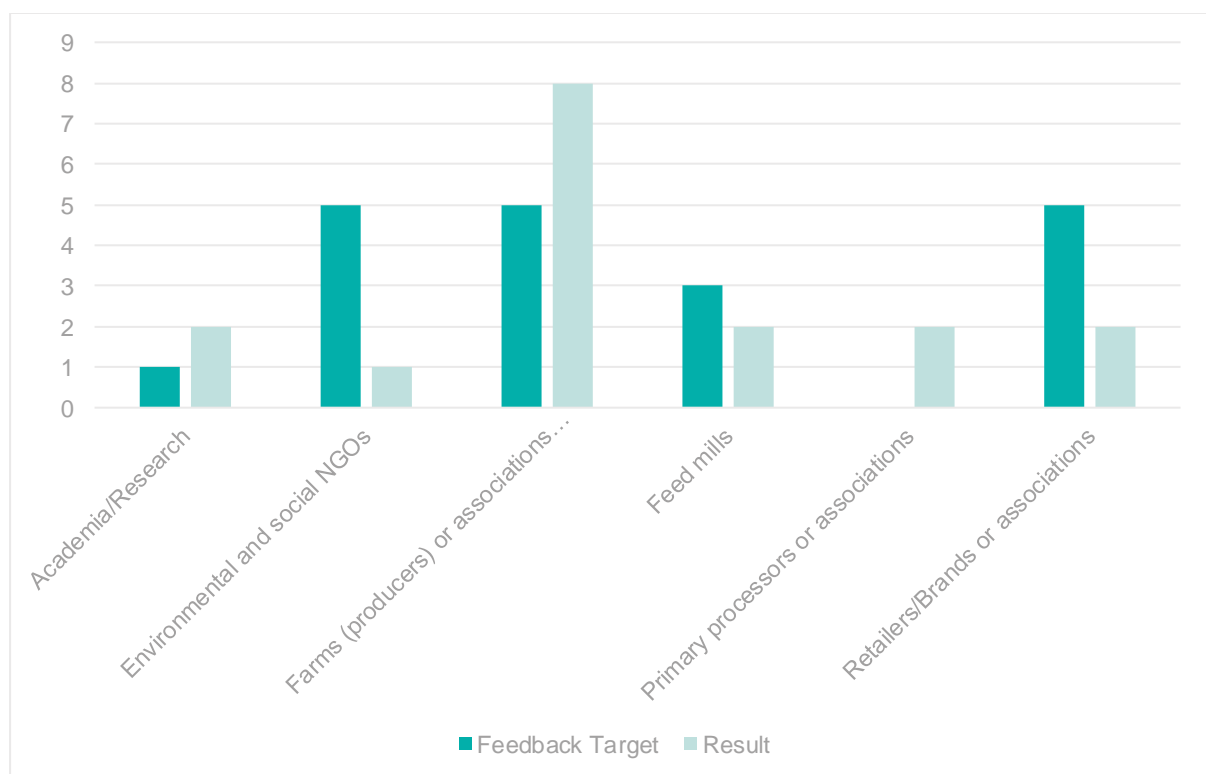


Figure 2: Sectoral representation of actual vs targets.

\* One of the farms (producers) is also a primary processor.

## 2 Summary of Feedback

Overall, the feedback received supported the approach and the proposed indicators of the ASC Pike-perch Module and highlighted the importance of adding new species to the ASC portfolio. In general, stakeholders supported the indicators proposed in Principles 1-7 of the ASC Pike-perch Module. Concerns were expressed by some stakeholders on proposed indicators for fish counting accuracy and commercially viable vaccines due to the slow(er) technological advancements in pike-perch aquaculture compared to other species. Likewise, concerns were



raised by stakeholders, mainly producers and feed mills, around the proposed indicator requirements for fishmeal (FM) and fish oil (FO) forage fish dependency ratio for grow-out (FFDRm and FFDRo, respectively) and its adequacy for pike perch production. These concerns relate to perceived fish health risks and challenges of decreasing the FM and FO inclusion in the diets to comply with the proposed indicator requirements. In this context, data collected during the consultation suggested higher values for FFDRm. With regards to data management, feedback indicates that pike-perch farms do use some sort of data management systems with exportable data which can be shared with ASC to comply with the data sharing requirement of the module. Finally, stakeholders expressed concerns about the clarity of some of the indicators and requested further guidance on the requirements or their intent.

A more extensive overview of the main themes raised during the Public Consultation in March - April 2023 and the ASC response/next steps are described in the next section.

## 2.2 Key themes

Below is an overview of the main themes raised during the Public Consultation in March - April 2023.

| Theme   | Summary of Consultation Feedback   | ASC Response/Next steps  |
|---|--|--|
| <p><b>Indicator 2.3.1</b><br/> <b>“New introductions of exotic pike-perch after February 2013, unless in a closed production system – None”</b></p> | <p>This indicator seeks to discourage the introduction of pike-perch into waterways (e.g. through escapes) where these species are not native or previously established. Overall, the feedback received support this proposed indicator. Feedback from producers confirms that pike-perch is native to the areas in production. Feedback also confirms that the production system most commonly employed for pike-perch production, RAS,</p> | <p>ASC agrees with the feedback received and confirms the proposed indicator for the module.</p> |

| Theme   | Summary of Consultation Feedback  | ASC Response/Next steps   |
|---|---|---|
|   | is low risk when it comes to fish escapes.  |   |
| <p><b>Indicator 2.5.2</b></p> <p><b>“The farm shall count all stocked and harvested fish using a counting technology or counting method with an accuracy of ≥98% - Yes”</b></p> | <p>Feedback received from producers indicates concerns regarding the practical application of this proposed indicator. Comments received suggest that the accuracy of current counting techniques in use in pike-perch aquaculture (e.g., in RAS and aquaponics) fluctuates significantly and is below 98%.</p> | <p>Fish escapes can occur in large events that are immediately noticeable at a farm, smaller events that are still noticeable, and through slower, lower levels of losses of fish that might go unnoticed. Proper escape prevention management requires accuracy in the number of fish in production. The accuracy of this number is limited by the margin of error of fish counting machines and other counting techniques. The proposed indicator seeks to encourage farmers to use counting devices or methods that are as accurate as possible, requiring a minimum 98% accuracy of the counting method. ASC will provide guidance that accuracy can be achieved in multiple ways, one of them being via (electronic) counters. Other means (e.g., hand-count, mass-balance) are acceptable as well, as long as the UoC can demonstrate compliance with 98% accuracy. This is a consistent requirement across most ASC (finfish) standards.</p> |

| Theme   | Summary of Consultation Feedback   | ASC Response/Next steps   |
|---|--|---|
| <p><b>Indicator 4.2.6</b><br/> <b>“Proactive vaccination against diseases that present a risk in the region and for which an effective, legally authorized and commercially viable vaccine exists, as determined by the farm’s designated veterinarian – Yes”</b></p> | <p>Feedback received indicates discrepancy among producers regarding the extent that diseases affect pike-perch aquaculture. However, some reported the use of autogenous vaccines, which have proven to be often ineffective. Overall, the feedback received agree that as of today there are no commercially viable vaccines for pike-perch aquaculture.</p> | <p>ASC agrees with the feedback received. Since the risk of disease transmission is covered extensively by different indicators within Principle 4 of the module, the proposed indicator will not be included in the pike-perch module. This indicator from the species-specific standards is currently under review within the development of the ASC Farm Standard.</p>                                 |
| <p><b>Indicator 7.2.1</b><br/> <b>“Source of fingerlings – Hatchery only”</b></p>   | <p>Feedback received from one producer suggested modifying the scope of this proposed indicator to RAS hatchery only and requiring that the full cycle of fingerlings production, from broodstock, occurs in these types of facilities.</p>  | <p>The scope of the proposed indicator in the current species-specific standards covers the fingerling stage and does not restrict to only RAS hatcheries. In line with the current ASC standards, ASC confirms this indicator to be included in the pike-perch module. This indicator from the species-specific standards is currently under review within the development of the ASC Farm Standard.</p> |
| <p><b>Indicator 5.2.1</b><br/> <b>“Fishmeal Forage Fish Dependency Ratio (FFDRm) for grow-out <math>\leq 1.5</math>”</b></p>  | <p>Concerns were raised by stakeholders, mainly producers and feed mills, around the proposed values for FFDRm, and its adequacy for pike-perch production. Specifically,</p>  | <p>Based on the feedback and the information collected, and using the <a href="#">Metrics Methodology</a>, ASC decided to revise the FFDRm value originally proposed. The revised value is now set to</p>   |

| Theme   | Summary of Consultation Feedback  | ASC Response/Next steps  |
|---|---|--|
| <p>and</p> <p><b>Indicator 5.2.2</b></p> <p><b>“Compliance with one of the two following requirements: a) Fish Oil Forage Fish Dependency Ratio (FFDRo) for grow-out (calculated using formulas in Annex IV), or, b) Maximum level of EPA/DHA content from marine sources as a percentage of fatty acids in the feed (excluding EPA/DHA from trimmings and by-products)- a) <math>\leq 2.95</math> or b) <math>\leq 9\%</math>”</b></p> | <p>concerns related to the perceived fish health risk and challenges of decreasing the FM inclusion in the diets currently in use to comply with the proposed indicator requirements. In that context, stakeholders suggested ASC conduct further research on this topic in order to require more appropriate metric for this indicator and to introduce a gradual approach by decreasing the FFDR values within certain periods of time. Likewise, there was confusion among stakeholders on the starting weight of the fish for FFDRm and FFDRo calculations.</p> | <p>FFDRm &lt; 2.3. The FFDRo value is confirmed as <math>\leq 2.95</math>.</p> <p>Due to the lack of data to support the proposed indicator 5.2.2 b), ASC decided to remove it from the module.</p> <p>With regards to the starting weight of the fish for the calculations of FFDRm and FFDRo, ASC confirms that is set at 10g in the module.</p> |
| <p><b>The ASC approach for the Species Scope Extension Project</b></p>  | <p>Several environmental and animal welfare organisations suggested ensuring that ASC assesses the data that the application of the requirements would collect for future updates and to set species-specific indicators.</p>   | <p>ASC agrees with the feedback and confirms that this is aligned with current procedures.</p>   |

| Theme   | Summary of Consultation Feedback   | ASC Response/Next steps   |
|---|--|---|
| <b>General clarity of the proposed indicator requirements</b> | Stakeholder feedback requested ASC to provide more clarity on some of the proposed indicator and their requirements. | ASC confirms that, as current specie-specific standards, guidance (i.e. Audit Manual) will be provided to accompany the module. |

### 2.3 Next Steps

ASC is satisfied with the public consultation engagement and the feedback received and in July 2023 the ASC Technical Advisory Group confirmed that a second public consultation on the ASC Pike-perch Module was not needed. A revised version of the proposal endorsed by the Technical Advisory Group (TAG) will be recommended to the ASC Board for approval in September 2023. Once approved, it is expected that the ASC Pike-perch Module will be published in Q1 2024.

### 3. Acronyms

| <b>Acronym</b> | <b>Definition</b>                     |
|----------------|---------------------------------------|
| <b>ASC</b>     | Aquaculture Stewardship Council       |
| <b>FAQs</b>    | Frequently Asked Questions            |
| <b>FCR</b>     | Feed Conversion Ratio                 |
| <b>FFDRm</b>   | Fishmeal Forage Fish Dependency Ratio |
| <b>FFDRo</b>   | Fish Oil Forage Fish Dependency Ratio |
| <b>FM</b>      | Fish Meal                             |
| <b>FO</b>      | Fish Oil                              |
| <b>NGO</b>     | Non-Governmental Organisation         |
| <b>RAS</b>     | Recirculating Aquaculture System      |
| <b>TAG</b>     | Technical Advisory Group              |

## 4. Annex: List of respondents

| Organisation (Stakeholder)                               | Contact Person           |
|--|--------------------------|
| Abela & Co   | Raseena P.T.             |
| AllerAqua  | Hanno Slawski            |
| AquaPri Denmark A/S                                      | Julia Overton            |
| Aquatic Life Institute / Aquatic Animal Alliance members | Tessa Gonzalez           |
| Basis 57   | Thomas Gisler            |
| Basis 57   | Andreas Seitz            |
| Basis 57   | Flavien Dekoninck        |
| BioMar A/S   | Kirsten Nyholm Mundbjerg |
| Edeka Südwest Fleisch                                    | Lisa Maxi Karpeles       |
| European Percid Fish Culture Group                       | Laurens Buyse            |
| European Percid Fish Culture Group                       | Stefan Teerlinck         |
| Kaiserzander   | Mark Saalman             |
| La Ferme Intégrale                                       | Manuel Perez             |
| La Ferme Intégrale                                       | Gabriel Faysse           |
| Migros-Group   | Nicole Fischer           |
| Next Tuna GmbH   | Paul-Daniel Sindilariu   |
| Percafrance  | Julien Saint-Sevin       |
| Percitech  | Beat Von Siebenthal      |
| SWIFISH AG   | Martin Vestergaard       |
| University of South Bohemia                              | Tomáš Pěnka              |