

# **ASC Public Consultation**

## **Stakeholder Consultation Non-survey Feedback Report**

### **Shrimp Health and Welfare**

**September – October 2023**

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## 1. Summary of Feedback Methods

In addition to feedback received via online survey, ASC collected feedback in three other ways:

- Online public workshops and in-person targeted workshops with regional and international partners
- Direct one to one meetings and phone calls
- Emails with written feedback

This document collates feedback received outside of the online survey which can be reviewed in the dashboard on the ASC website.

Feedback Method	Individual Participants*	Stakeholders*
Workshops	100	47
1:1 meetings and phone calls	2	2
Emailed feedback	2	1

## 2. Workshops

### 2.1 General Workshops

General workshop #1

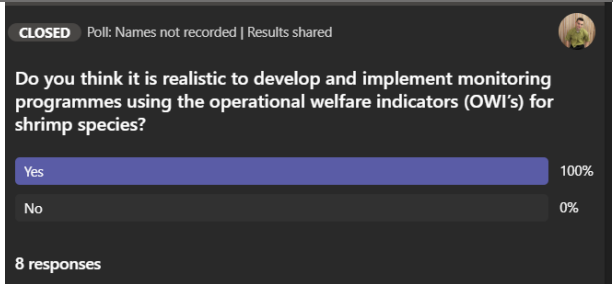
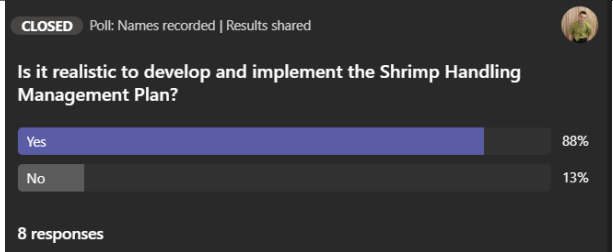
Question	Respondent	Comment
How can the stress test be measured/documented?		This is usually done with salinity checks/stress tests or ammonia stress tests. A sampling of shrimp is put inside extreme salinity water for example, and they wait for some minutes and after they count survivals from that sampling. There is a procedure for this, and it needs to be recorded. In terms of how they can recover etc.



<p>Thanks, but there are still issues at farm level due to equipment at the place. seems challenging</p> <p>Perhaps best to make mandatory for hatchery level not at farm level?</p> <p>So this would mean that it would be better to include in the hatchery and leave it out at the farm level... since some can do it... some can but not mandatory if not feasible.</p>		<p>That is why we ask for the 98% but perhaps we could also be asking for 95 or 90% as we have discussed with our TWG.</p> <p>Normally this is a procedure that is done more at the hatchery level. But with the TG we discussed that sometimes the farmers do want to do a double check before they accept the PLs in the facilities. So they may take one bag and do the test again. Depends on farm complexity. A lot of farms have labs internally so easy to transport larvae and do the stress test. Indeed not possible always.</p> <p>I see what you mean. Worth considering. Big issue here is when farmers have intermediate stages inside the the farm, for example from nursery ponds to the growing ponds and this is a challenge because sometimes they are not sure if the PL's are ready, to go to the from the nursery ponds to the ongoing ponds.</p>
<p><b>What kind of water hygiene agents are recommended on farm level, with the present of shrimp?</b></p> <p>We would recommend the use of hydrogen peroxide or peracetic acid at low dose. These oxidizing agents are fully biodegradable and would help the farmers to fulfill the ASC standards.</p>		<p>Actually, this question is more relevant to another criteria. Unsure, if it could be related to the component and if you can use or not or it is related to the legislations in the country. If registered (i.e., probiotics) could be used in one country.</p> <p>In terms of pathogen/pest control, this is already included (part of finfish...). And this already included in biosecurity measures, which cover this area.</p>


## General workshop #2

Question	Respondent	Comment
<p>S.3 &amp; 4</p> <p><b>Is it realistic to have an indicator asking to purchase shrimp nauplii,</b></p>		

larvae or post-larvae (PL) only from the nearby hatchery?		<p><b>CLOSED</b> Poll: Names not recorded   Results shared</p> <p>Is it realistic to have an indicator asking to purchase shrimp nauplii, larvae or post-larvae (PL) only from the nearby hatchery?</p> <p>Yes 13%</p> <p>No 88%</p> <p>8 responses</p>
		<p>Not realistic to include as a straight up requirement. There needs to be an assessment based on each kind of production and whether there is an appropriate hatchery nearby. Since decisions may be made based on welfare or other reasons that would make them choose to go further than the nearby hatcheries. The reasons could be quality, cost, welfare or certification. Things that could improve the situation could be a risk assessment on the hatchery to decide which hatchery to choose, justifying at audit. And this could require prior to movement health checks, evidenced at audit or also a risk assessment of PLs and transport facilities and everything along the chain. More of an evidence-based approach rather than focusing on proximity alone.</p>
In chat		<p>Distance is only one of many factors that can impact PL welfare.</p>
In chat		<p>nearby hatchery does not necessarily produce good quality PL or able to meet the biosecurity requirements</p>
In chat		<p>in Vietnam, some hatchery is included in the corporation as C.P, Viet Uc, so they exchanged Nauplii together so the farm in the South can buy PLs from the North of Vietnam. No reason to regulate "purchase PLs form nearby hatcheries"</p>
In chat		<p>Sometimes there are no nauplii labs closer or sometimes is regarding commercial aspects to be taking into account for producers.</p>
In chat		<p>Even when distance is more, if proper welfare methods are used, faster transport methods etc., used during transport, it may not have much impact</p>
In chat		<p>PL quality, risk assessment and traceability are key</p>
In chat		<p>in land animals in UK &amp; EU there must be a max target transport time of 8 hours. Could this be considered. In UK target chicken transport time is</p>

		<p>&lt;4 hours. Perhaps an upper limit to distance is a way of limiting negative welfare of transport</p> <p>or a risk assessed max time based on country and transport types available</p>
In chat		<p>Is there a gradient of transport time depending on the water parameters, for instance? Reduced transport time for certain water temp, etc.</p>
<p>S5</p> <p><b>Do you think it is realistic to develop and implement monitoring programmes using the operational welfare indicators (OWI's) for shrimp species?</b></p>		 <p><b>CLOSED</b> Poll: Names not recorded   Results shared</p> <p>Do you think it is realistic to develop and implement monitoring programmes using the operational welfare indicators (OWI's) for shrimp species?</p> <p>Yes 100%</p> <p>No 0%</p> <p>8 responses</p>
		<p>Yes - it is worth stating that this would depend on which &amp; what type of OWI's you can reasonably do this with, but for most, this should be fine.</p>
In chat		<p>Yes, we can implement OWIs but considerate the reality for applying</p> <p>the most difficult that how the farm get the monitoring records of OWIs from hatchery</p>
<p>S.7</p> <p><b>Is it realistic to develop and implement the Shrimp Handling Management Plan?</b></p>		 <p><b>CLOSED</b> Poll: Names recorded   Results shared</p> <p>Is it realistic to develop and implement the Shrimp Handling Management Plan?</p> <p>Yes 88%</p> <p>No 13%</p> <p>8 responses</p>
		<p>Yes, but there is a caveat to this draft. There is an expectation for a shrimp health &amp; welfare management system and then in another section, there is an expectation for a shrimp handling management system. This could be a systems overload. Could these requirements be combined in one to simplify? Why so many systems?</p>
In chat		<p>Could there be a guide on how many days after the event to record any impact/morph changes etc.</p>
In chat		<p>Small farms mainly focus on welfare of shrimp rather than document at that particular time. So it may difficult.</p>
In chat		<p>examples pls more specify "every handling"!</p>

Is the Shrimp Handling Management Plan part of the Farm Health Plan?		██████: no, they are separate documents.
In chat: <b>what the duration of calculated for 98% here?</b>  if from PLs stocking to harvest -> cannot so the revision must be clarified for this require		
		Handling would be any operation that involves moving the animals from the rearing water or that involve crowding. For example transport, harvesting, grading, treating...
<b>Is the survival rate of 98% after the "stress test" adequate?</b>		<div> <div>CLOSED</div> <div>Poll: Names recorded   Results shared</div> <div>  </div> <div>Is the survival rate of 98% after the "stress test" adequate?</div> <div> <div>Yes</div> <div>80%</div> </div> <div> <div>No</div> <div>20%</div> </div> <div>5 responses</div> </div>
In chat		Producers should really govern this one I think
In chat		<p>No mention of max lift time of harvest from pond to chill-kill station.</p> <p>Crowding time?</p>
<b>"The UoC shall ensure all shrimp are stunned prior to killing, by immersion in a controlled ice slurry bath or electrical device". Do you agree with the stunning methods permitted?</b>		<div> <div>CLOSED</div> <div>Poll: Names not recorded   Results shared</div> <div>  </div> <div>"The UoC shall ensure all shrimp are stunned prior to killing, by immersion in a controlled ice slurry bath or electrical device". Do you agree with the stunning methods permitted?</div> <div> <div>Yes</div> <div>88%</div> </div> <div> <div>No</div> <div>13%</div> </div> <div>8 responses</div> </div>
		<p>Clarify what ice/slurry/water means</p> <p>Yes - but its not just ice slurry used, iced water is used as well</p> <p>they are two different things</p>

In chat		when quick pick up shrimp from the pond it is leading some water from pond, and ice was smelt into ice-water mix
In chat		By the time the standard is released it may be that evidence to support electric is classified as humane, or not. I think it is too early to say yes/no as a response, could you time bound it?  would add that it also needs water
<b>"The UoC shall ensure ice slurry is &lt; 4 °C and at a 1:1 ratio of ice: shrimp". Do you agree with the requested parameters?</b>		<div><div>CLOSED</div><div>Poll: Names not recorded   Results shared</div><div></div><div>"The UoC shall ensure ice slurry is &lt; 4 °C and at a 1:1 ratio of ice: shrimp". Do you agree with the requested parameters?</div><div><div>Yes</div><div>50%</div></div><div><div>No</div><div>50%</div></div><div>6 responses</div></div>
In chat		Agree with the temp part, not the ratio. The key indicator here is temperature. So long as the temperature is maintained below 4C, then the ice quantity by default will be sufficient
In chat		should it be less than/equal 4 °C?
In chat		would add "stunned & killed" prior to adding any other compound -concerns around crowd handling

## 2.2 Thailand Workshop & Farm Visits

### Workshop Thailand Shrimp Farmers

#### General questions

**S1:** All presents agree with the below. No longer come back to the below .

no extra mutilations

1-Some farms stop to do the ablation (AF) also because they do need so much production at this time.

2-Focus on the quality of the PL even if less non ablated PL broodstock sources more strong PL's also stronger.

3- In a long-term perspective should be okay.

**S3:** All presents agree with the below.



Focus on quality not if it is near hatchery. The nearest hatchery is the second point to think about after quality. It takes 1 hour normally from farm to hatchery in case if longer hatchery will provide better conditions to maintain the PL quality during the transportation.

**2.14a** Doing a lot of what is asked for, but some issues below...**OWI's can be a issue here**

Salinity (twice a day better to be weekly)

Ammonia (weekly); nitrate is costly and can only do the nitrite.

Carbone dioxide is not seeing the point to do it, and do not know how to be tested.

Oxygen, calcium, magnesium, alkaline, nitrate, ammonia, pH (one or twice a week) salinity maybe weekly.

A lot of parameters are measured, but not registered. Too heavy in terms of parameters: temperature is not important for them because they cannot do anything about it. If they can have a better price in the future, no worries.

Pay more attention loss of attention on production, if more parameters requested operator with more education. (TRAINING IS A NEED TO EVERYONE AT THE FARM)

Small farmers will need support in building the OWI's traffic light system.

Don't have a way to see in the price the benefits comparing the cost of the certification.

**2.14b**

**S7** all good

**S9** 90% acceptance stress test not 98% stress test

**2.14c** 1:1 some questions arise in how to measure this 1:1 and when it is done (clarify in the guidance)

**S11; S13; S15** all good no issues to comply.

**S18** No

**Farm visits**

General questions

**S1:** skip the question related to AF because lack of experience in farming. They do not have a control in the practices at the hatchery. They just purchase from a supplier.

**S3:** not using CP PL anymore new supplier Syaqua better quality and less pathogens. Focus on quality not if it is near hatchery. Syaqua hatchery 2-3 hrs by road.

**2.14a** Pathogen test every lot provided by the supplier.

FHWMS

Water quality parameters turbidity customers will support will be according needs. If needed other parameters needs to be done on the same way.

T, O<sub>2</sub>, pH and alkalinity and ammonia 2 x day

Nitrates not measured extra cost (externally if necessary will need to have support)

Hardness weekly (supported)

Small farmers will need support in building the OWI's traffic light system.

Maybe it would be easy a cooperation between farmers to access the theoretically values.

At the end can be done, but it is the more difficult especially if they do not have support.

## **2.14b**

**S7** all good

**S9** 90% stress test is the acceptable value.

**2.14c** difficult have control because is the broker that will provide the ice, and they cannot ask for more. In addition is very dependent of the whether temperature.

4-10 C have a range of temperature. Maximo 7 C at the farm.

Do not use metabisulfite.

**S11; S13; S15** all good no issues to comply apart of the ice one. Outsourced team for harvest (only check the temperature) with ice all the time. Just checking after at the sizing area. Never seen shrimp moving later. Cannot lose the focus because of sizing and in some farms not in this one shrimp can be stolen.

Alive harvest is okay. Water quality and densities during transportation is controlled.

**S18** Any

**2.16** All good for them. No antibiotics use.

The big issue will be the implementation of the new indicators at the beginning, but after that it will be easy. Will be good if taken the considerations above to make it more flexible.

#### Notes:

██████ doesn't sell so much ASC shrimp mostly life shrimp to process to Japan. is selling more ASC cert. shrimp.

Shrimp checked every day.

Some pathogens free tested dependent of the budget.

### 2.3 Vietnam Workshop

All presents agree with the following.

**S1 and S2:** No mutilations known apart from the eyestalk ablation.

**S3 and S4:** Impossible. Important is the quality. Already there are a lot of good conditions during transportation. No issues if it is from a far hatchery or not.

**S5 and S6 2.14b** Are assessing already these OWI's the only thing is to put all the documents together and build the traffic light signal. Implementation manual would be a big help on that. Non-Integrate and small farmers probably will need an extra help. More support from ASC. Training is a need. Very positive feedback they can stress out a bit at the beginning with the Implementation, but after is just a matter of running the system.

**S7 and S8 2.14b** No issues with this system a matter of consolidate documentation.

**S9 and S10** 90% acceptance after the stress test 98% is too much.

**S11; S12; S15; S16** don't know so much about electrical, and never seen in a farm slaughter. All agreed with controlled ice-slurry.

**S13 and S14 2.14c 2.1** ratio ice: shrimp will be difficult to control, all okay with the temperature.

**S17 and S18** All good

**S19** Non-integrated farms will face some difficulties to move to AF broodstock but agreed with the timeline provided to reach 100% AF for vannamei for monodon still a lot of questions, but probably is only a matter of time. In addition, ASC must bear in mind that some monodon hatcheries still dependent of wild broodstock.

More support from ASC In Implementation of the new Farm Standard. Better shrimp price. Training.

Questions arise about survival rate values. Where do they come from? In some farms it is difficult to reach the level ask.

Not using sodium metabisulfite for quality preservation.

asked for training from ASC. A lot of indicators are not applicable for extensive farming systems Black Tiger.

## 2.4 CAB Workshop

Two workshops were conducted but served a more informational purpose therefore no feedback or comments were received.

## 3. One to One Meetings

### Feedback #1

Contact:

Company:

Background: Vetrinarian working in the UK and Ireland. Previous experience working as a vet for fish and shrimp in Mexico.

1 and 2. As per CF.

9. Records must be available.

13. Formalin ammonia are considered as very harsh methods that should not be allowed. Salinity was the method more widely used in Mexico at the time. The company for which worked used 90% (but it was a long time ago, so things might have changed).

2.14a.16 Health plan should be reviewed at least on an annual basis as a lot of the intensive systems don't really have a fallow, but continuous production.

2.16.5.2 No experience of bacteria reuse (fermentation) in Mexico. Maybe the indicator needs to be more clear in the sense that probiotics are allowed, but there should not be reuse/fermentation. According to experience Mexican producers used products from well know providers and followed the providers' guidelines in terms of use. Frequently the provider was offering a veterinary service to follow up on product use and avoid poor practices.

2.16.6 Same as per CF.

2.16.14 Something that was done on a routine basis in Mexico was to take sediment samples from the bottom of the earthen ponds. They would then try to isolate pathogenic bacteria from these and culture them. They would then do an antibiogram to gain a better understanding of antibiotic sensitivity/resistance patterns. This was not done in the case of race-way production.

At the end of the crop, in earthen ponds they would remove aprox 20cm of sediment from the bottom, put Cl, and let dry for at least 2-3months. Race-ways were covered by a plastic liner that would allow for easy cleaning and disinfection using Cl.

## Feedback #2

**Progenitors salvajes:** Ya no se usan en Ecuador. Hubo un gran comercio entorno a los 70 y los 80, pero ahora ya terminó. Hoy en día todos los reproductores son domesticados. Algunas hatcheries como Hendrix, tienen núcleos cerrados, otras núcleos abiertos en las que entran los animales mas vigorosos de lotes comerciales que han estado en engorde.

**Tratamientos:** Se realizan tratamientos a nivel de hatchery. El producto químico más usado es la formalina. Esta se usa para tratar ectoparásitos (especialmente protozoos branquiales), especialmente en progenitores y post-larvas. También se usa el EDTA para quelar ciertos metales que se pueden encontrar en el agua. Los ácidos orgánicos (e.g. aceite de clavo, tea tree...) se usan también mucho hoy en día para reducir cargas bacterianas. Los antibióticos ya no se usan, pues ha habido muy mala prensa y muy malas prácticas por parte de la industria hasta principios de siglo. Los principales problemas bacterianos en hatchery son las vibriosis e infecciones por pseudomonas.

**Mecanismo de feedback con el engorde:** Existe, no te preocupes que si hay problemas lo sabes.

**Stress test:** En Ecuador ya no se usan. En su lugar se hacen chequeos de calidad pre-transfer, en los que se mira morfología, comportamiento, y sobre todo estado del hepatopáncreas. Los stress test más tradicionales eran la inmersión en formalina o en agua de baja salinidad (0ppt). Se exponía a los animales por un corto periodo de tiempo (1h?) y después se volvían al tanque. Allí se observaban por 1h y se registraba la supervivencia. 90% era una buena cifra, más alto es difícil.

**Cadena de abastecimiento más corta:** Se pueden hacer transfer largos con muy buena calidad del PL y sin riesgos sanitarios si el transporte se hace en buenas condiciones y de manera bien planificada.

**Amputación de pleópodos para muestreo sanitario:** Se hace para detección de virus. El pleópodo se corta en el punto de autotomía y vuelve a crecer en la siguiente muda. No hay mortalidades asociadas o casos de infección. No se usa anestésico pero si se enfría el agua. Solo se corta uno. Se puede muestrear también hemolinfa (son intercambiables?).

**Ablación:** Es fácil mentir. A parte de los marcadores genéticos, siempre te pueden engañar. Exigir que la hatchery solo pueda usar ablación y no combinado sería la mejor manera de asegurar que no haya engaños.

## 4. Emailed feedback

### Feedback #1

#### Section **New indicators covering shrimp origin**

**Scope: Shrimp nauplii, larvae, post-larvae or broodstock** (page 2): is this applied for Hatchery standard / or Farm standard?

If applied for Farm which is audited for ASC Farm standard -> some questions below:

The “shrimp supplier” here means the hatchery that supplies PLs for farm which is audited ASC farm standard (as “ASC farm” here), right?

Is the Appendix xyz applied for hatchery/shrimp supplier? What is the competent of this trainer? Trainer competent is sourced from internal or external train? Can be given some examples of these Certificates

With **Indicator 1**: what can be evidence for compliance of this indicator? Is the farm is being audited of ASC shrimp standard shall provide to auditor (as “ASC auditor” here) these evidences during that current audit?

With **Indicator 2**: what is evidence for compliance of this indicator?

The Note 2: is not actual happen in Vietnam due to:

- The hatchery have to locate in secure places -> no affect by weather
- Most of monitoring activities are manual perform / no reason of major equipment failure

With **Indicator 3**: as this indicator, why the hatchery cannot use the stock nauplii, larvae or post-larvae (PL) which is raised by their corporation?, such as C.P in Vietnam, example: the C.P Kien Giang Branch hatchery uses the nauplii which is sourced by spawning at C.P Ninh Thuan Branch hatchery

The Note 3: same as Note 2 above

With **Indicator 4**: the “ASC farm” have to provide to “ASC auditor” the monitoring records for daily for mortality of the hatchery (shrimp supplier) as compliance evidence?

With **Indicator 5**: not need to regulate here, because the hatchery have to remove the mortality quickly to avoid the biosecurity risk and as per environmental regulations/waste control

With **Indicator 6**: same question as **Indicator 4** above

With **Indicator 7**: Is the tests follow OIE regulations being comply?



With **Indicator 8**: Does WHO have regulations on shrimp diseases? Pls give the reference information

With **Indicator 9**: the “ASC farm” have to provide to “ASC auditor” the records of “performs regular site visits of fish health manager visits of the hatchery (shrimp supplier) as compliance evidence?”

With **Indicator 10**: a lot of requirements require for hatchery here: what evidences of “ASC farm” has to provide to the “ASC auditor”?

With **Indicator 11**: same question as **Indicator 10** and with point:

- the name and address of the owner or keeper of the animals: is this the name & address of the hatchery/shrimp supplier?
- the premises at which the animals are kept if this is different from the address of the owner or keeper : In Vietnam, this means conflict with meaning of **Indicator 3** (if obligated)

With **Indicator 13**: same question as **Indicator 10**

And how to calculating of 98% of point “h” here (= number of PLs sold to “ASC farm” / number of nauplii stocked after breeding? -> if right -> impractical with reality)

### Section “**Table 1 of Criterion 2.14a: Water quality parameters and their monitoring frequency, per type of culture system.**”:

There is no explanation for the note “166” and “167”

Can the “ASC farm” use internal devices/method for measuring all parameters in Table 1?

### Section “**Sub-criterion 2.14c – Fish Health and Welfare: Slaughter**”

Note 29: so the alive shrimp products are not allowed to be ASC certification?

Does the more audit times given when there are a lot of requires must be checked during the ASC farm audit?

## Feedback #2

### W.r.t eyestalk ablation

The time-, and species- bound approach seems reasonable and will help not to disrupt supply chains. However, it appears in the short term this could potentially lead to a price increase (due to changes and investments necessary) which will in the long run be compensated by stronger offspring of non-ablated females and perhaps a price drop again.

