

ASC Stakeholder Consultation

Stakeholder Consultation Summary Report

Living Wage

September – October 2023

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Acronyms

Acronym	Definition
ASC	Aquaculture Stewardship Council

TAG	Technical Advisory Group
TWG	Technical Working Group
CAB	Conformity Assessment Body

1. Background

The objective of developing the ASC Farm Standard is to create a single best-practice global aquaculture standard applicable to all farmed seafood species currently within scope of the ASC standards. The ASC Farm Standard comprises three core principles setting requirements to assess farms’ environmental and social performance: (1) legal and regulatory compliance; (2) environmental standards and (3) human rights standards. The stakeholder consultations that took place from September to October 2023 covered:

- **Living Wage (Principle 3: Criterion 3.8)**
- **Fish Health and Welfare (Principle 2: Criterion 2.14)**
- **Antibiotics and other Veterinary Therapeutants (Principle 2: Criterion 2.16)**
- **Hatcheries and Intermediate Sites (Principle 2: Criterion 2.17)**

This report relates to the feedback on the Living Wages Criterion 3.8. A summary of the feedback can be found in Section 3. On-farm pilots and impact testing also took place alongside this consultation. The timeline below shows upcoming stages for the ASC Farm Standard development and finalisation:

Figure 1: ASC Farm Standard Development Timeline



A Technical Working Group (TWG) created to support the development of standard requirements for living wage is comprised of representatives from a range of stakeholders ([see LW ToR](#)).

The group has convened twice (March 2023 and May 2023), with a third meeting in November 2023. In March, the group reviewed the objectives and the living wage measurement pilot to test the [IDH salary matrix](#) tool and learn more about

living wage gaps in key target countries. In May, the group reviewed the draft indicators and received an update from the pilot activities. In November, the TWG came together for one last time to review the feedback from the stakeholder consultation period, some results coming in from the pilots and discuss some directions for next steps.

1.1 Objectives

The objectives of this stakeholder consultation were to:

- Gain an understanding of whether the draft living wage indicators address key social and human rights issues around wages in line with stakeholders' expectations.
- Gain insights from CABs on whether the proposed indicators are auditable.
- Gain insights from producers on whether the proposed indicators are feasible to implement.
- Understand the impact of the requirement to pay workers a minimum of two-thirds of salary while on maternity leave.

1.2 Approach and transparency

As ASC is committed to transparency in the development of our standards, we publish all survey response comments on our website. To ensure stakeholders provide full and open feedback, ASC does not attribute published responses. Names and organisations of those providing feedback on Living Wage indicators appear separately in the appendices of this document. Anonymous submissions are not accepted.

ASC collected feedback in four ways:

1. Online survey in English
2. Online public workshops and targeted workshops with regional and international partners
3. Direct one to one meetings and phone calls
4. Emails with written feedback.

ASC used several methods to engage stakeholders and increase accessibility, including:

- Direct engagement via targeted Mailchimp campaign (email sent out to over 5000 recipients) and ASC newsletter (1121 subscribers)]
- An online survey
- General and CAB-specific online workshops
- One-to-one interviews with retailers
- Dedicated [webpage](#)
- Personal emails by ASC staff
- Social media communication with links to ASC webpage (LinkedIn and Twitter)
- Criterion Draft, annexes and slide decks in English, Spanish, Vietnamese and French
- Release of accompanying documents such as consultation questions overview and FAQs

2. Participation

ASC identified six priority stakeholder groups to consult with on the ASC Farm Standard:

1. Academia/Research
2. CABs/Auditors
3. Environmental and social NGOs
4. Farms (producers) or associations thereof
5. Primary processors or associations thereof
6. Retailers/Brands or associations thereof

In this consultation, we received feedback submissions from **62** individual participants. In total these individual participants represent **44** stakeholders. Where there are multiple individual participants from one organisation, this is counted as one stakeholder response. Some individual participants provided feedback via multiple methods, and therefore are only counted once. ASC aims to balance feedback across stakeholder groups. Policy decisions are not taken on quantity of feedback or level of support alone.

The table below shows the number of individual participants and stakeholders per priority target group as well as the relevant feedback target.

Table 1: Number of individual participants and stakeholders per target group.

Priority Stakeholder Group	Feedback Targets	Individual participants	Stakeholders
Academia/Research	2	1	1
CABs/Auditors	4	22	9
Environmental and Social NGOs	8	6	6
Farms (producers) or associations thereof*	14	22	18
Retailer/Brand or associations thereof	11	5	5

*Feedback was received from 1 farm association and 18 farms of which 14 are certified.

The overall level of stakeholder feedback was strong, with participants from a wide range of stakeholder categories. ASC reached most targets for all categories, apart from Academia/Research, NGOs, and Retail.

Figure 2: Map with geographic representation of individual participants for Living Wage

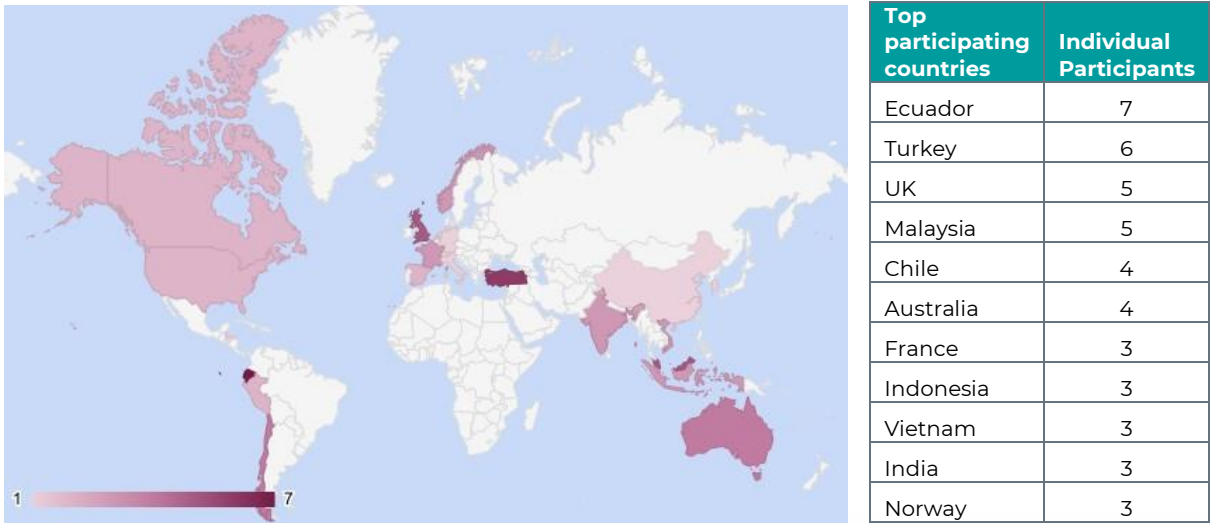
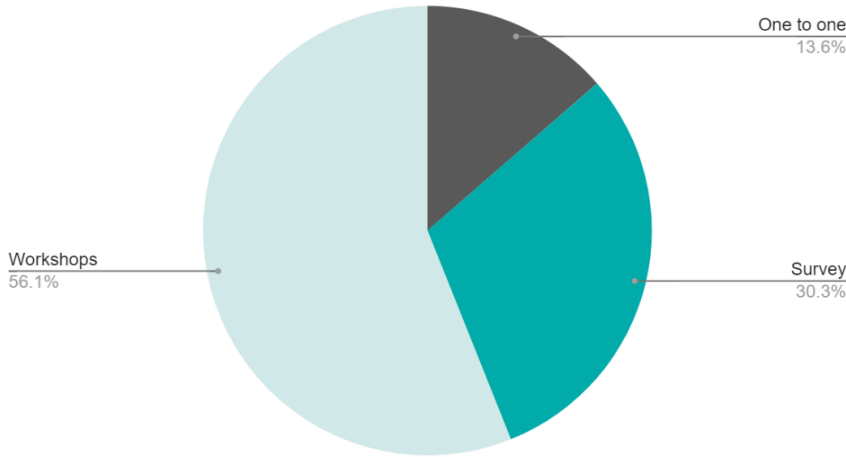


Figure 3: Feedback Source/Individual Participants

Source/Individual Participants



More details about stakeholder engagement targets, feedback methods and respondents are included in Appendix 2.

ASC gathered feedback through an online survey, which received 20 submissions, through individual interviews with retailers, through feedback from emails and through three online public workshops that were scheduled to accommodate participation from different time zones. All three workshops were well attended with 19 individual participants representing 14 stakeholders in total across the sessions. 18 individual participants representing 8 different CABs attended CAB-specific workshops where living wage indicators were discussed. The Mentimeter tool was used to engage participants in the workshops.

3. Summary of feedback

3.1 Summary of feedback

Key Theme	Summary of Consultation Feedback	ASC Response/Next steps
Is it realistic to ask producers to measure wages and benefits, according to a set methodology?	In the survey, 12 responded 'yes' and 7 responded 'no'. Comments from the survey indicated that some respondents were thinking about the methodology for understanding a living wage (e.g. living wage benchmarks), not the methodology for measuring wages. Across the categories of stakeholders, many indicated that producers would need to be adequately supported as the methodology could add cost and complexity, and producers could find the IDH salary matrix methodology difficult to use and take some time to get used to, but some noted the importance of moving forward with a standardised tool. Some stakeholders also noted that the development of collective bargaining agreements could contribute here.	ASC notes that there is a preference in the industry for a standardised methodology of some kind and is working on the IDH salary matrix pilot project to understand the feasibility of this tool, for both producers and auditors, before making final decisions about a wage measurement methodology.
Is it realistic to ask CABs to verify the measurement of wages and benefits, according to a set methodology?	In the survey, 13 responded 'yes' and 5 responded 'no'. Some respondents who responded 'no' noted that CABs already have enough to audit and this area may not be within their expertise.	The role of ASC's assurance programme in the implementation of these requirements is important and ASC will work to develop training for CABs if and when the verification of a particular methodology is necessary.
Is it realistic to ask producers to develop wage improvement plans?	In the survey 14 responded 'yes' and 6 responded 'no'. Some of the challenges raised were understanding that sometimes wage increases are linked to increased skills or performance, concerns around profitability for the farm and a lack of detail in the indicator about what this should include. In workshops and 1-1 interviews, feedback was evenly divided on whether or not the improvement plans should include timelines. Some said they should, and some said they should not.	As ASC is at the beginning of a journey on living wage, and some producers will have large gaps to bridge before they are able to pay a living wage to their employees, ASC will leave timelines out of the requirements for a wage improvement plan in this version of the standard – working to give producers as much flexibility to achieve living wage as possible. ASC will also provide guidance in the Interpretation Manual.
Does indicator 3.8.8 on maternity leave align with current practice for farms?	In the survey 12 responded 'yes' and 5 responded 'no'. Stakeholders in workshops and in survey comments raised concern that the maternity leave requirements could lead to discrimination. They also noted that this could be complicated to implement depending on the legal context.	ASC will continue working on this requirement, with particular consideration to applicability in some countries, and the risk of creating situations where there is sexual discrimination.
How much of a 'hot topic' is living wage among buyers and consumers?	1-1 interviews showed that on the whole buyers and consumers do not yet think about this but with the introduction of EU Due Diligence laws, this is likely to come more into people's awareness. The Due Diligence laws could take some time to have a large-scale impact, however.	For these outward-facing pieces, ASC will continue to understand and work to align with the upcoming EU Due Diligence legislation, focus on marketing ASC certified products (creating value) and engaging with actors along the supply chain to work

What is your perspective on living wage in seafood sector right now?	1-1 interviews showed that living wage is not yet a top priority topic in seafood. There is more discussion around social risk more generally (particularly in Shrimp).	together for the achievement of living wage in the aquaculture industry.
Role of various companies in supply chain	1-1 interviews and participants in workshops agreed that everyone in the supply chain has a role to play but that price is an important factor. The role of companies in this will be long-term work, and communication and transparent supply chains are important. There was encouragement for ASC to keep working on marketing to create price premiums and to be bold on requiring financial support from retailers. A comment from a stakeholder through the survey noted that the indicators do not go far enough in including collaboration and support around shared responsibility.	

3.2 Full feedback

[Dashboard](#) presenting survey results and full feedback is published online.

3.3 Next steps

A final, full 30-day consultation on the resulting ASC Farm Standard will be conducted in March 2024 before the final product is presented to the ASC Technical Advisory Group (TAG). The TAG will provide a formal recommendation to the ASC Board in September 2024 to adopt the ASC Farm Standard.

Appendix 1: List of individual participants

STAKEHOLDER	INDIVIDUAL PARTICIPANT
Grieg Seafood Finnmark AS	Ellen Sandvik Berg
Grieg Seafood BC	Luke Pletsch
Grieg Seafood	Kristin Storry
LRQA	Simon Goldby
LRQA	Llorente, José
Kaleka	Heni Martanila
Kaleka	Venticia Hukom
Cermaq Global	Liv Andrea Myklevoll
Cermaq Global	Ingunn Johnsen
WWF UK	Eilidh Milligan
Agfocert	Armoni
Agfocert	Gamze
Intertek	Bangping Wang
Intertek	Lionel Liu
Control Union	Katherine Martinez
Control Union	Farah Amalin Mahhadi
Control Union	Chin Yin Yin
Control Union	Robert Bravo
Control Union	Jorge Luis Riveros Ramirez

Control Union	Jose Carlos Morales Bermúdez Hernández
Control Union	Francy Beatriz Garcia Tacza
Bureau veritas	Duong Thanh Dao
Bureau veritas	Wilit Muensroy
Bureau veritas	M Manimuthu
DNV	Vandit Patel
DNV	Caragliu, Massimo
Omarsa	Sandro Coglitore Castillo
Omarsa	Mariuxi Hidalgo
Omarsa	Alex Quintana
Omarsa	Fiorella Vanoni
Omarsa	Cristhian Armijos
AGFO	Emin Demirci
AGFO	Beril Gül-AgfoCERT
Salmon Australia	Ingrid Elizabeth Rosa Minte
Salmon Australia	Julio Carlos González Paulsen
Salmon Scotland	Richard Beckett
TANA FARM	Công Nguyễn Thành
JLB Management Consultancy Pty Ltd	Dr Peter Lauer
Human Rights at Sea	David Hammond
ALDI SOUTH GROUP	Athenais Levraud
Fair Trade USA	Hanna Cody
AGFO Teknik Kontrol ve Belgelendirme Hiz. Ltd. Şti.	Emin Demirci
Royal Mayan	Jessica Ramclam
Hatko	Mert Bozkurt
Rivera Marina S de R.L.	Melissa Ramos
Riverence Holdings LLC	Heather Almgren
Picard	Sidonie Malegeant
Sankina Aquaculture Sdn Bhd	Jenny Ou
Conservation Strategy Fund	Cindy Silvia
Independent auditor	Aracelly Pino
NSF	Che King Lee
Produmar	Wolfgang Harten
Corporación Lanec	Joao Fernando
Queensland University of Technology	Victoria Camilieri-Asch
LP Foods	Thanh Le
Coop CH	Böni Philipp
Seafood Solutions	A B Ch Mohan
Sea Farms	Dominique Gautier
Albert Heijn	Marloes Bruin
Systeme U	Aurelie Menenteau

Appendix 2: Feedback Details

1. Feedback methods

Feedback Method	Individual participants*	Stakeholders**
Online survey	20	18
Workshops (CAB & General)	37	22
1:1 meetings and phone calls	9	6
TOTAL	62	44

Table 2: Overall participation in the stakeholder consultation on Criterion 3.8 of the ASC Farm Standard.

*Individual participants refers to actual number of feedback submissions received via different methods. **Where there are multiple individual participants from one organisation, this is counted as one stakeholder response.

2. Progress against targets

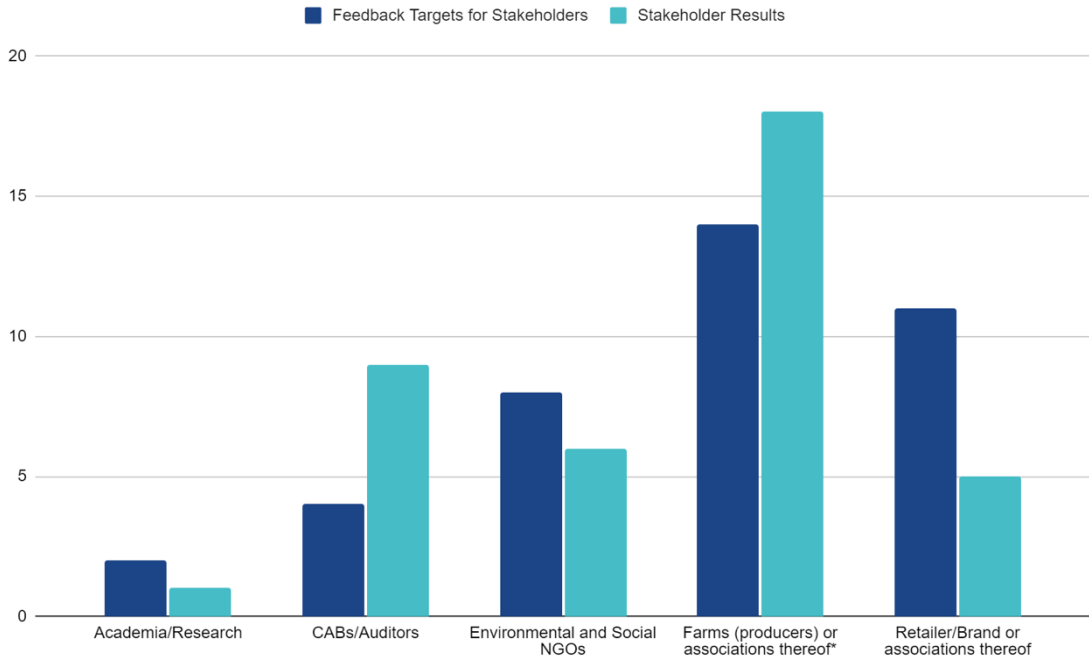


Figure 4: Sectoral representation of actual results versus targets.