ASC Farm Standard – Water Quality

Stakeholder Consultation Summary Report

March – April 2023

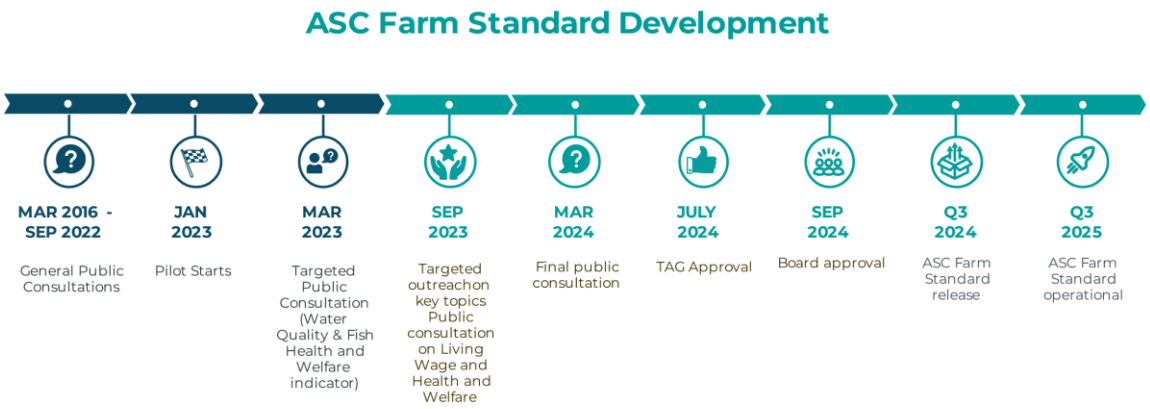
Table of Contents

1. Background

The objective of the ASC Farm Standard alignment process is to develop a single best-practice global aquaculture standard applicable to all farmed seafood species currently within scope of the ASC standards. The ASC Farm Standard will have production-system specific criteria and species-specific metrics where necessary. The Farm Standard comprises three core principles setting requirements to assess farms' environmental and social performance. The public consultation that took place from March to April 2023 covered:

- Principle 2: Criterion 2.7 – Water Quality
- Criterion 2.14 - Fish Health and Welfare.

A complete Farm Standard consultation is scheduled for March 2024. On-farm pilots and impact testing also took place parallel to this consultation. The final decision on the adoption of the ASC Farm Standard will be made in September 2024.



Technical Working Groups (TWG) were formed to support the development of the Water Quality proposals. The TWGs comprise experts from different stakeholder sectors but with specific expertise in the subject matter. Recommendations from these TWGs were incorporated into the proposals released for public consultation for 60 days in March 2023. This report covers consultation objectives and outcomes relevant for the Water Quality criterion.

1.1 Objectives

The objectives of this public consultation were to:

- Build consensus that the proposed ASC Farm Standard Water Quality requirements address aquaculture's key sustainability issues in line with stakeholders' expectations
    - Create awareness of the alignment process, which merges the previous 11 species-specific standards
    - Seek agreement on proposed indicators/criterion language
- Understand the impacts of proposals on specific stakeholder groups
- Gain insights from Conformity Assessment Bodies (CABs) on whether the ASC Farm Standard is auditable
- Gain insights on whether the ASC Farm Standard is applicable across all production systems, regions, species and farm sizes
- Ensure that previous stakeholder feedback on Criterion 2.7 – Water Quality was considered and addressed identified needs and concerns.

Consultations are also an important way to raise awareness of changes that are likely to affect stakeholders in coming years, provide an opportunity to engage more with programme users and build understanding about the ASC programme and its impact.

1.2 Approach

ASC is committed to transparency to ensure stakeholders can understand the rationale for decisions on standards' content. Section 3 contains a summary of feedback including responses from ASC on key themes raised by stakeholders. ASC has also published all comments received. To ensure stakeholders provide full and open feedback, ASC does not attribute published responses. Names and organisations of those providing feedback are published separately and annexed to this document. ASC does not accept anonymous submissions.

ASC collected feedback in four ways:

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

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

- Direct engagement via targeted Mailchimp campaign (email sent out to almost 5000 recipients) and ASC newsletter (999 subscribers);

- Personal emails by ASC staff (181 individuals);
- Social media communication with links to ASC webpage (LinkedIn and Twitter);
- Criterion Draft 2.7 – Water Quality and annexes in English, Japanese, Spanish, and Vietnamese;
- Slide decks on the criterion in English, Japanese, Spanish, and Vietnamese;
- Consultation questions overview document;
- Dedicated Water Quality webpage on the criterion;
- Expert interview explaining the criterion;
- Release of accompanying documents such as the FAQs and a TWG Recommendations.

2. Participation

The focus of this stakeholder consultation was to engage those whose viewpoints are crucial to the credibility of the ASC Farm Standard. These include hard-to-reach stakeholders and sometimes, those critical of the Farm Standard's content, and/or standards in general as a tool to transform aquaculture towards sustainability. For consulting on the ASC Farm Standard, ASC identified 13 stakeholder categories. Within these, 5 priority stakeholder groups were identified:

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

In total, there were 48 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 83 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*
Online survey	25 responses	24 organisations / independent individuals
Workshops	38 responses	25 organisations / independent individuals
1:1 meetings and phone calls	6 responses	5 organisations / independent individuals
Emailed feedback	14 responses	6 organisations / independent individuals

TOTAL	**83 responses**	**48 organisations / independent individuals**

Table 1: *Overall participation in the stakeholder consultation on the Water Quality criterion of the ASC Farm Standard.*

**Responses refers to actual number of feedback submissions received via different methods. *Respondents refers to the organisation or individual that submitted feedback. Submission from individuals representing the same organisation have been grouped together as well as they were counted only once even if they submitted feedback via multiple channels.*

Bold *total number of respondents counts number of respondents only once, even if feedback was provided through multiple channels.*

ASC organised two online public workshops on Water Quality with stakeholders from different sectors and regions. These identical workshops were held over two days to accommodate different time zones. Both workshops were well attended with about 17 participants in total representing different sectors.

In addition to the online public workshops, ASC organised targeted feedback workshops with selected regions and stakeholders identified as particularly relevant for this consultation. The targeted workshops were well attended with over 36 participants in total.

Direct engagement, particularly personal emails proved to be the most effective method to generate feedback for most stakeholder groups.

2.1.1 Progress against targets

The level of feedback received from priority stakeholders was good, reflecting the resources committed to providing a range of engagement and feedback methods. The table below shows number of respondents per priority stakeholder group:

Stakeholder Group	Feedback Targets	Respondents
Academia/Research	6	5
CABs/Auditors	4	9
Environmental and Social NGOs	3	4

Farms (producers) or associations thereof*	16	22
Feed mill	-	1
Governments/Regulating bodies	3	0
Primary processors or associations thereof	-	11
Retailer/Brand or associations thereof	-	1
Secondary processors (traders) or associations thereof	-	6
Other *(Consultants, individual and other)*	-	4

Table 2: *Number of respondents per priority stakeholder group.*

** Feedback was received from two farm associations and 9 farms of which 8 are certified. Some of the farms (producers) are also primary processors. One secondary processor is also a primary processor and vice versa. CAB/Auditor category includes ASI.*

The table below shows the feedback target and actual respondent numbers. Out of the set 5 stakeholder target groups, 2 were not met. There was insufficient feedback from academia/research as well as no feedback from governments/regulatory bodies. Within the other key stakeholder categories some specific subgroups were underrepresented. Further consultation will seek to reach these stakeholders.

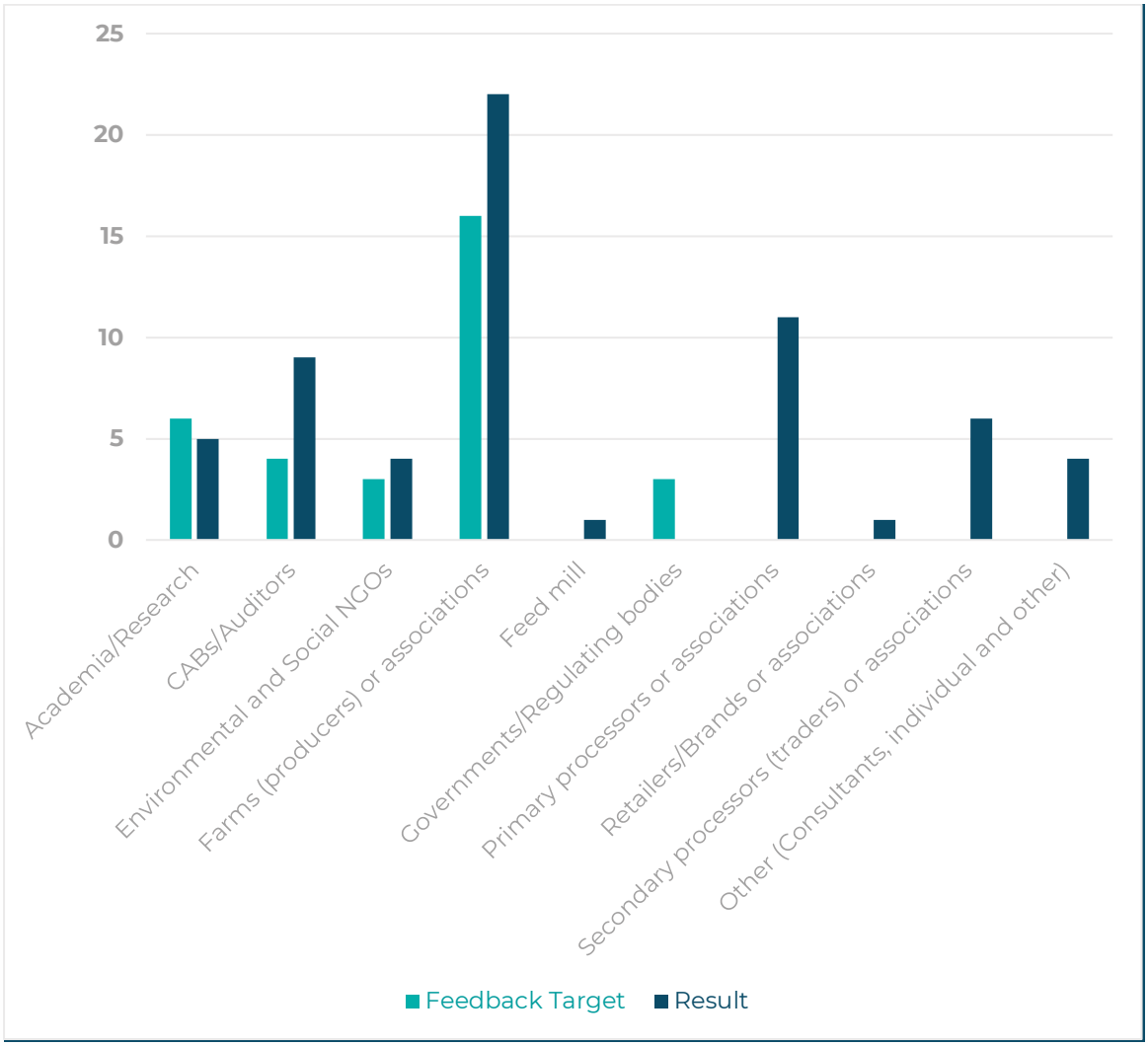


Figure 2: *Sectoral representation of actual vs targets.*

NB: *Feedback was received from three farm associations and 9 farms of which 8 are certified. Some of the farms (producers) are also primary processors. CAB/Auditor category includes ASI.*

3. Summary of feedback

3.1 Summary of feedback

Key Theme	Summary of Consultation Feedback	ASC Response/Next steps
Requirements for nearshore marine systems	Stakeholder feedback revealed a general lack of clarity in the proposal for nearshore marine systems. In that context, stakeholders expressed: ○ Doubts about whether the proposal applies to nearshore marine systems as: ○ The methodology is not clear for the classification of these type of water bodies/systems. ○ The boundaries to be applied are not clear for the definition of the Waterbody Unit of Management (WUM). ○ The language used for categorising water bodies (lentic or lotic) is more typically used when referring to freshwater systems. ○ Concerns about how the proposal will apply in cases where aquaculture is practiced in already highly degraded marine environments (e.g. Baltic Sea).	The Technical Working Group (TWG) supporting ASC with this revision agreed that the proposal is not clear enough on how to approach the categorisation of a water body in nearshore marine systems nor how to set the boundaries of the required Waterbody Unit of Management (WUM). Furthermore, the TWG agreed that the language used to categorise a water body (lentic or lotic) might confuse stakeholders. Preliminary deliberations of the TWG around these concerns resulted in the decision to reach out to marine water quality experts to discuss options for appropriately defining the boundary for where the approach to lentic systems could apply within nearshore marine environments. Learnings from those discussions will inform a revised version of the proposal for these systems. The TWG also agreed to explore a different language for categorising water bodies aiming to avoid perceptions that the categorisation refers only to freshwater systems. On the issue around the concerns in cases where aquaculture is practiced in already highly degraded marine environments, the TWG considers that the proposal as a whole aims for no damage or no additional damage to a system and that the approach towards collective impact and avoiding trophic shifts in lentic systems addresses this issue effectively.

Determination of baseline conditions in lentic systems	A few stakeholders expressed concerns about the requirements for determining baseline conditions and trophic status for lentic water body systems. Specifically, the concerns are around the sampling effort to develop the baseline and the potential for corrective actions if the trophic status breakpoint is crossed.	Preliminary deliberations of the TWG highlighted the need to better communicate the requirements around sampling for baseline conditions and the fact that there might be readily available information/data in some/most of the jurisdictions through the implementation of other regulations/frameworks (e.g. the Water Framework Directive, WFD).
Data collection	General stakeholder feedback indicated concerns around the data collection and analysis requested by the proposal. The concerns are related to a perception that data collection and analysis are overly burdensome and/or complex and/or costly.	Preliminary deliberations of the TWG on this feedback resulted in the suggestion that these concerns should be alleviated through better communication of the proposal. Options discussed by the TWG include the development of a simple companion document outlining the changes incorporated in the proposal (in comparison with current species-specific requirements) and how they are scientifically justified, along with tables and/or diagrams showing how the indicators interact for different scenarios (production systems and water type). A table on current vs new requirements and a document quantifying cost under worst-case scenarios could be helpful. The TWG also requested that the information should be clear and explicit for when data from, for example, the Water Framework Directive (WFD), or other sources, will be deemed equivalent to the one requested by the proposal. It is expected that ASC will have this documentation available for the next public consultation. ASC will provide tools to support farms with the implementation of the proposal.

Cumulative impacts	Some stakeholders, mainly farm producers, expressed concerns about the proposed approach to cumulative impacts. Particularly, stakeholders found it unfair/inappropriate to be penalised in cases where non-certified farms are located in a water body and collective actions are required for that water body.	Preliminary deliberations of the TWG confirm the proposal's approach to cumulative impacts and believes that it effectively addresses the fact that the water quality of a water body must be approached from an area-based perspective.
Metrics	Some stakeholders expressed disagreement with the metrics included in the proposal and found them "arbitrary".	TWG will deliberate on this feedback in the next TWG meetings, ahead of further discussion with stakeholders and the next public consultation.

3.2 Full feedback

Dashboards and full feedback are published here.

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

Acronyms

Acronym	Definition
ASC	Aquaculture Stewardship Council
AZE	Allowable Zone of Effect
CAB	Conformity Assessment Body
IQI	Infaunal Quality Index
NGO	Non-Governmental Organisation
PC	Public Consultation
TAG	Technical Advisory Group
TAN	Total Ammonia Nitrogen
TG	Technical Group
TMFF	Tropical Marine Finfish
TWG	Technical Working Group
UoC	Unit of Certification

Annex: List of respondents

Organisation (Stakeholder)	Contact Person
Abela & Co	Raseena P.T.
Acoura Marine t/a LRQA	Samuel Dignan
Acoura Marine t/a LRQA	Matthew James
Acoura Marine t/a LRQA	Lewis Warren
Acoura Marine t/a LRQA	Daniel Gomez
Acoura Marine t/a LRQA	Filaretos Kaminaris
AMITA Corporation	Wataru Koketsu
Aquafinca St. Peter Fish	Sara Henríquez
Aquanexus	Karla Meza
AquaPri Denmark A/S	Julia Overton
Aquapro Inc.	Dr. Yoonji Yeon
Aquatic Life Institute / Aquatic Animal Alliance members	Tessa Gonzalez
ASI	Francisco Javier Padilla Magan
ASI	Linh Nguyen
Bioceanor	Maxime Paris
Bureau Veritas Certification Holding SAS	Thanh Dao
Bureau Veritas Certification Holding SAS	Wilit Muensroy
Cermaq Norway	Ingunn Johnsen
Colorado State University	Ed Hall

Compassion in World Farming (CIWF)	Elena Lara
Control Union	Kirit Kene
Control Union	Phattareeyaporn Phattarachaiyakhup
Control Union	Duygu Dayioglu Cobanoglu
Control Union Peru (CUP)	Andrea Guzmán
Control Union Peru (CUP)	Claudia Flores Coronado
Control Union Peru (CUP)	Cristian Vargas
Cromaris	Julija Smoljan
Dainichi Corporation	Masao Ueki
Dainichi Corporation	Mr Yuta
Dainichi Corporation	Yosuke Takeda
Danish Aquaculture Association	Lisbeth J Plesner
DNV Business Assurance Italy S.r.l.	Rosendahl Kristiansen
DNV Business Assurance Italy S.r.l	Mario Corti
DNV Business Assurance Italy S.r.l	Francesca Vescovi
FishEhtoGroup Association	Fábio Barroso
Förde Garnelen	Kilian Landsch
Global Ocean Works (GOW)	Toshiaki Yonemori
Global Ocean Works (GOW)	Fukiko Fujimura
Global Ocean Works (GOW)	Kawano
Global Trust Certification Limited	Spyros Nikolakakis
Grieg Seafood BC Ltd.	Luke Pletsch

Hatko Teknik Donanimlar Mumessillik Ve Tic. A. S.	Mert Bozkurt
Hatko Teknik Donanimlar Mumessillik Ve Tic. A. S.	Nermin Tunc
Independent	Freddy Andres Chavez Bolivar
Interdisciplinary Center for Aquaculture Research (INCAR)	Doris Soto
Intertek Testing Services Ltd.	Lionel Liu
INTESAL	Felipe Tucca
JASS Ventures Pvt Ltd	Joe Antony
JLB Management Consultancy Pty Ltd	Peter Lauer
KF Foods Limited	Sujira Huadsawat
Maruha Nichiro	Yuta Hamasaki
Marukin	Shingo Suzuki
Naturisa-Sociedad Nacional de Galapagos (SONGA)	Jorge Cordova
Nordic Trout	Pasi Korvonen
Okeanos Food Co.,Ltd.	Thirathorn Limsombun
Percafrance	Julien Saint-Sevin
Pukyong National University	Jungwhan Park
Riverence Group	Karen Handerson
Riverence Group	Jesse Trushenski
Salmon Scotland	Iain Berrill
SeaChoice/Living Oceans Society	Kelly Roebuck
Seafresh Group	Dominique Gautier

SGS Nederland BV	Nikki Den Boon
Skretting Japan	Yoshiaki Ina
Skretting Japan	Hikaru Nagata
University of South Bohemia	Tomáš Pěnka
WWF (including contributions from WWF Greater Mekong, WWF Japan, WWF Malaysia, WWF Singapore and WWF US)	Various
Yumigahama Fisheries Co.	Ryouji Kuranaga