



ASC Farm Standard – Fish Health and Welfare Stakeholder Consultation Summary Report

March – April 2023

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This report refers to ongoing policy development and does not reflect final policy or position of the Aquaculture Stewardship Council.

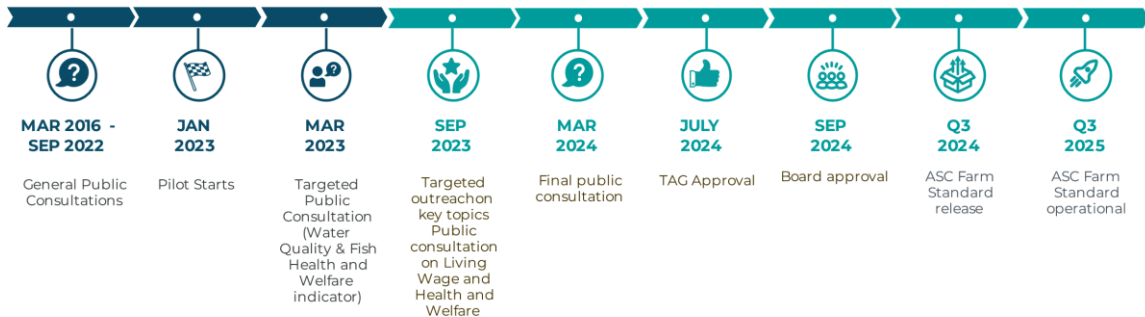
1. Background

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 stakeholder 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 final consultation on the complete Farm Standard is scheduled for March 2024. The final decision on the adoption of the ASC Farm Standard will be made in September 2024.

ASC Farm Standard Development



The stakeholder consultation included two main proposals for the Fish Health and Welfare topic which covered the audit mechanism for sub-criterion 2.14c on slaughter, and an indicator to phase out shrimp eyestalk ablation practices.

There is currently no mechanism within the ASC auditing system to cover slaughter operations. For this reason, a new audit mechanism was proposed to increase transparency and assurance. If slaughter takes place at the farm, it will be audited as part of the ASC farm audit carried out through a Conformity Assessment Body (CAB), alongside other ASC Farm Standard requirements. However, if slaughter does not take place at the farm but at another facility run by the same or another company, then the audit mechanism can be executed by either an internal audit (in the case of vertically integrated facilities), a second party audit by the farm or Unit of Certification or by a third-party audit by an ASC-approved auditor. In all these cases, the audit reports would be

checked by the CAB during the ASC farm audit, and the CAB will have the capability to organise a punctual visit to the slaughterhouse if considered necessary.

Secondly, a criterion on eyestalk ablation was presented for inclusion in the ASC Farm Standard. Eyestalk ablation is a widespread practice to induce rapid maturation and spawning through hormonal manipulation in female shrimp. It is widely acknowledged that this practice leads to suffering and stress. Recent research, however, suggests that “ablation-free” production is possible in Pacific whiteleg shrimp (*L. vannamei*). The current proposal thus only covers the Pacific whiteleg shrimp and no other species (e.g., black tiger shrimp or *P. monodon*) due to a lack of research on the specific species. The proposed indicator for Pacific whiteleg shrimp will require farms to source all nauplii, larvae or post-larvae from “ablation-free” female broodstock within certain timelines.

1.1 Approach

ASC is committed to transparency. We want to ensure stakeholders can understand the rationale for decisions on standards’ content. Section 3 contains a summary of feedback including responses from ASC to 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;
- 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:

- Overview document of all consultation questions on the Fish Health and Welfare criteria;
- Direct engagement via targeted Mailchimp campaign (email sent out to almost 5000 recipients) and ASC newsletter (999 subscribers);
- Personal emails by ASC staff (209 individuals) on Criterion 2.14c - Slaughter Audit Mechanism;
- Personal emails by ASC staff (140 individuals) on Criterion 2.14x – Eyestalk Ablation;
- Social media communication with links to ASC webpage (LinkedIn and Twitter);
- Slide decks on Criterion 2.14c - Slaughter Audit Mechanism in English, French, Japanese, Spanish, Turkish, and Vietnamese;

- Slide decks on Criterion 2.14x – Eyestalk Ablation in English, French, Japanese, Spanish, Turkish, and Vietnamese;
- A short video explaining the Criterion 2.14c - Slaughter Audit Mechanism in English;
- A short video explaining the Criterion 2.14x – Eyestalk Ablation in English;
- Release of accompanying documents such as the FAQs.

2. Participation

2.1 Slaughter

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 55 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 a feedback workshop) and therefore this number differs from the total of 67 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	35 responses	35 organisations / independent individuals
Workshops	22 responses	14 organisations / independent individuals

1:1 meetings and phone calls	2 responses	1 organisations / independent individuals
Emailed feedback	8 responses	6 organisations / independent individuals
TOTAL	67 responses	55 organisations / independent individuals

Table 1: Overall participation in the stakeholder consultation on the Slaughter Audit Mechanism 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 targeted feedback workshops with selected regions and stakeholders identified as particularly relevant for this consultation. The targeted workshops were well attended with about 37 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 from priority stakeholders was high, reflecting the resources committed to providing a range of engagement and feedback methods. The table below shows feedback targets and respondents per priority stakeholder group:

Stakeholder Group	Feedback Targets	Respondents
Academia/Research	-	3
CABs/Auditors	4	11

Environmental and social NGOs	3	14
Farms (producers) or associations thereof*	11	11
Feed mill	-	1
Primary processors or associations thereof	8	11
Retailers/Brands or associations thereof	5	6
Secondary processors or associations thereof	-	7
Other (Consultant, individual etc)	-	3
TOTAL	-	55

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.

Overall participation in the consultation was good. Feedback targets across the different activities were reached in all key stakeholder groups. Within the categories, some specific subgroups were underrepresented. These included mainly certified farms (producers). Feedback was also obtained from a few stakeholder groups that were not originally targeted. These were academia/research, secondary processors or associations thereof, consultant, feed mill and other.

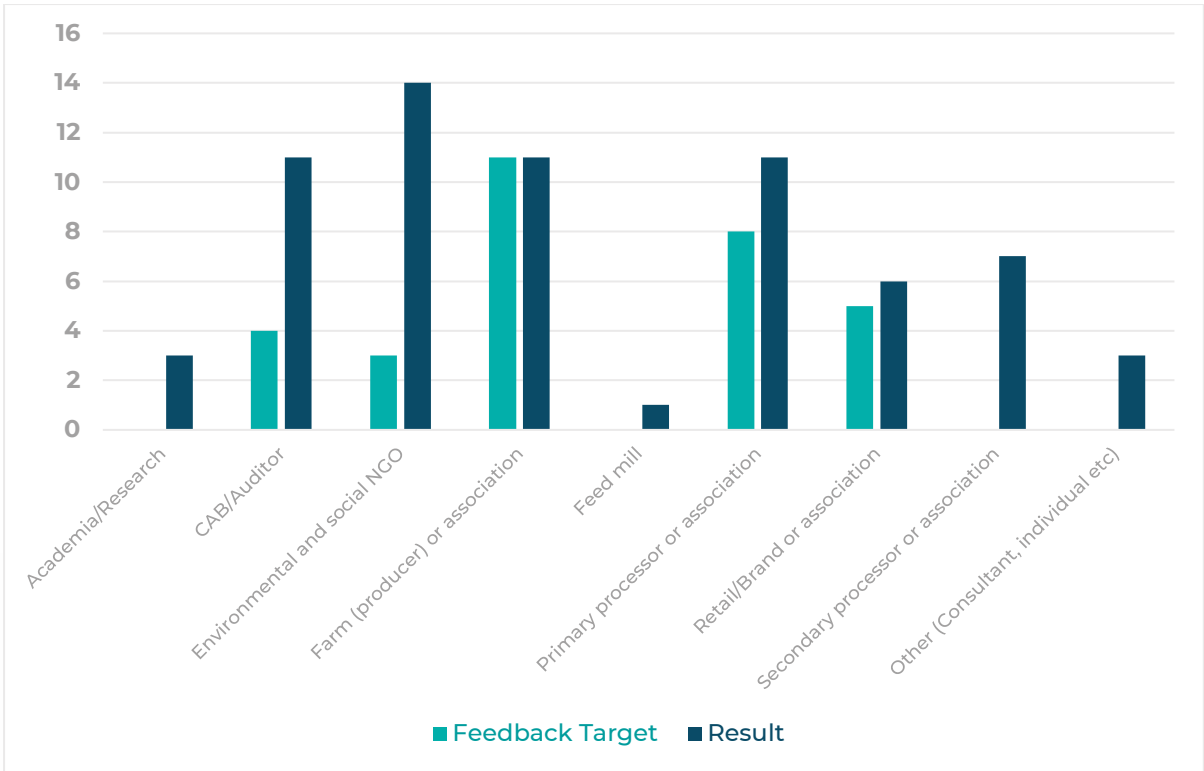


Figure 2: Sectoral representation of actual vs targets.

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.

Breakdown of respondents by country:

Country	Total
Japan	7
United Kingdom	7
France	6
Germany	5
Australia	3
Belgium	3
Canada	2
Chile	2
Vietnam	3

Denmark	2
Netherlands	2
Norway	2
Spain	2
United States	2
Bulgaria	1
China	1
Colombia	1
Croatia	1
Czech Republic	1
Greece	1
Italy	1
Malaysia	1
Portugal	1
Sweden	1
Thailand	1
Turkey	1

Table 3: Number of respondents per country

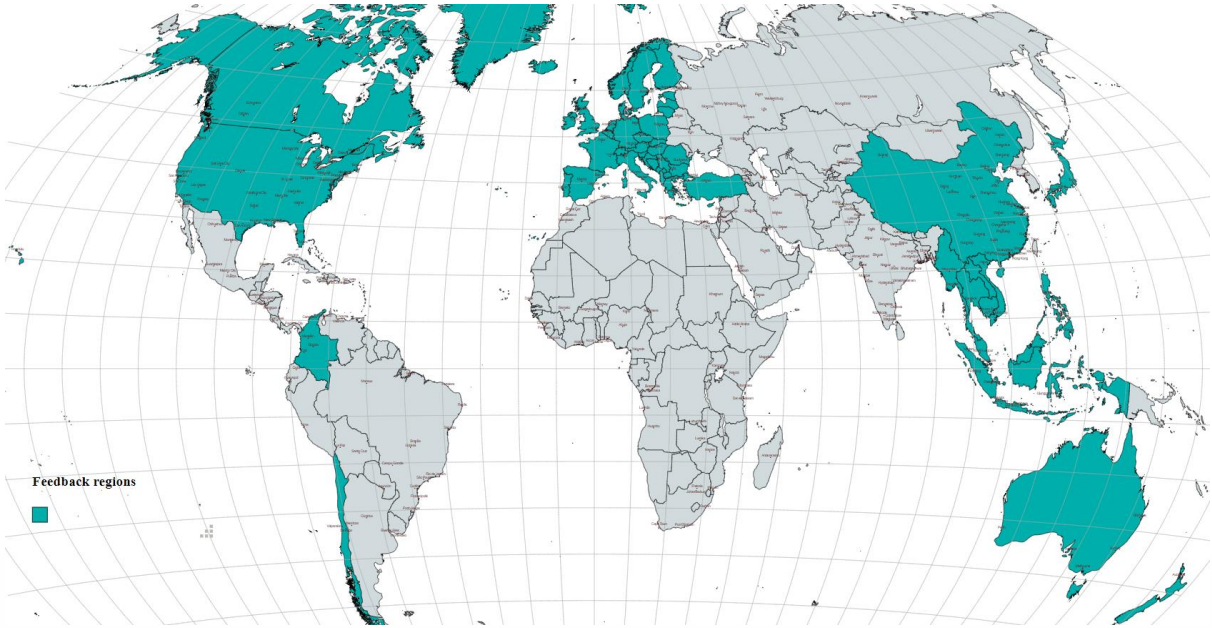


Figure 2: Represented regions

2.2 Eyestalk ablation

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 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 five priority stakeholder groups were identified:

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

In total, there were 41 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 a feedback workshop) and therefore this number differs from the total of 46 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*
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Online survey	28 responses	27 organisations / independent individuals
Workshops	11 responses	11 organisations / independent individuals
1:1 meetings and phone calls	1 response	1 organisations / independent individuals
Emailed feedback	6 responses	4 organisations / independent individuals
TOTAL	46 responses	41 organisations / independent individuals

Table 3: Overall participation in the stakeholder consultation on the Eyestalk Ablation Indicator 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 targeted feedback workshops with selected regions and stakeholders identified as particularly relevant for this consultation. The targeted workshops were well attended with about 11 participants in total.

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

2.2.1 Progress against targets

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

Stakeholder Group	Feedback Targets	Respondents
Academia/Research	3	3
CABs/Auditors	4	0

Environmental and social NGOs	3	17
Farms (producers) or associations thereof*	2	5
Feed trader/supplier	-	1
Primary processors or associations thereof	-	3
Retailers/Brands or associations thereof	5	9
Secondary processors or associations thereof	-	1
Other (Consultants etc)	-	4
TOTAL	-	41

Table 4: Number of respondents per priority stakeholder group.

* Feedback was received from one farm association and 4 farms of which 3 are certified. Some of the farms (producers) are also primary processors.

Overall participation in the consultation was good. Across the different activities, all key stakeholder groups were reached, except for CABs/Auditors, which did not participate. NGOs were the best represented stakeholder group, with responses about 6 times higher than the target. Also, it is important to highlight that some NGOs worked together submitting feedback as a coalition rather than individually.

From the online survey, it is possible to say that only 43% of the respondents had worked directly with shrimp, and 57% had never done so. Of the former, 60% had experience with both *P. monodon* and *L. vannamei*, 20% only with *L. vannamei*, 10% only with *P. monodon*, and 10% with other species. Respondents operate in the following regions: Europe (in particular France, Switzerland, Germany, and Belgium), Asia (in particular Singapore and Vietnam), and America (North, Central and South).



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.

Breakdown of stakeholder groups by country feedback:

Country	Total
United Kingdom	7
France	5
United States	5
Germany	4
Netherlands	3
Thailand	3
Japan	2
Sweden	2
Australia	1

Belgium	1
Canada	1
Czech Republic	1
Ecuador	1
Honduras	1
India	1
Madagascar	1
Malaysia	1
Philippines	1
Singapore	1
Spain	1
Switzerland	1
Vietnam	1

Table 5: Number of respondents per country

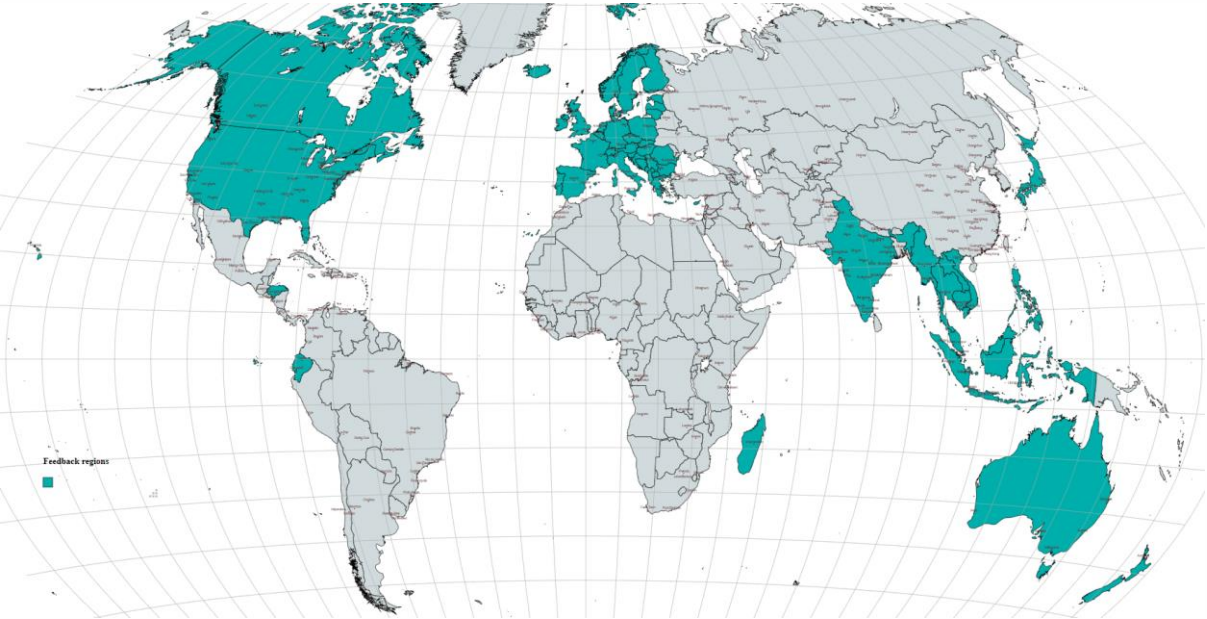


Figure 1: Regions represented

3. Summary of Feedback

Feedback received on the slaughter mechanism was good, with most targets met. Implementation challenges were pointed out by stakeholders. High feedback rates from NGOs reflect the high interest towards this topic.

In regard to eyestalk ablation, the feedback received was sufficient and provided a good degree of understanding of stakeholders' views. High feedback rates for NGOs again reflect the high levels of interest towards this topic. Feedback per species was good, with a good representation of the two main cultured shrimp species (*L. vannamei* and *P. monodon*). However, there was little direct experience with shrimp amongst respondents to the online survey.

3.1 Key themes

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

3.1.1 Slaughter

Key Theme	Summary of Consultation Feedback	ASC Response/Next steps
Suitability of the proposed audit mechanism	<p>The proposed audit mechanism proved to be controversial, with an almost 50:50 split between supporters and detractors. Main supporters were producers and primary processors, while main detractors were NGOs that responded in large numbers and retail/brand associations. CABs were supportive, but highlighted challenges related to implementation of the mechanism.</p> <p>Third-party audits were the mechanism being proposed as an alternative by CABs and NGOs.</p> <p>In addition, implementing a system of periodic random announced third-party ASC audits of off-site slaughter centres to verify internal</p>	<p>Require a compliance assessment by a third-party auditor from an ASC accredited CAB. This would be out of the scope of accreditation, providing the right level of assurance at an acceptable cost for producers.</p> <p>Decide whether compliance assessments need to be carried out by the same or different CAB that carries out the farm audit.</p>

	and second-party audits would provide reassurance to some stakeholders (NGOs, CABs and small number of retailers.	
Format (general)	Footnotes in sub-criterion 2.14c (and criterion 2.14) are excessive.	Review footnotes.
Interpretation manual (general)	Suggestion that the Interpretation Manual for 2.14 should be shared during the September 2023 PC.	Consider whether this suggestion is appropriate.

3.1.2 Eyestalk ablation

Theme	Summary of Consultation Feedback	ASC Response/Next steps
Respondents background	Most respondents had experience with <i>L. vannamei</i> . Other species were less represented.	Reach out to stakeholders that have experience with other species than <i>L. vannamei</i>
Suitability of the indicator	Most of the respondents considered that the indicator should be more ambitious both in terms of timelines and species covered (some suggested to extend the scope to <i>P.monodon</i> and/or all crustaceans). It is important to note that a large number of respondents to the survey were NGOs, with farms and retail/brand being under-represented.	Review proposed indicator and reconsider both timelines and scope.
Implementation timeline	Most respondents would like to see a more ambitious timeline. Respondents proposed multiple suggestions, a popular one was 25% by Q2 2025, 50% by Q2 2027, and 100% by Q2 2029. This view was supported mainly by NGOs,. Producers and retailers agreed that the proposed timeline	Reconsider proposed timeline.

	was realistic and that in some cases might be challenging, although they acknowledged the need for change.	
Indicator's scope	82% of the respondents thought P. monodon should be included, while 18% thought it shouldn't.	Reconsider scope.
Derogation	One stakeholder (producer) suggested there should be a derogation to account for situations when circumstances external to the producer don't allow to meet the ablation transition timeline.	Consider whether to include derogation.
Interpretation manual (general)	One stakeholder (NGO) suggested that the Interpretation Manual should be out for stakeholder consultation in September 2023.	Consider whether this suggestion is appropriate.

3.2 Full feedback

Dashboards and full feedback are published here.

3.3 Next steps

All feedback will be considered and discussed within ASC. Necessary additional feedback will be sought from relevant stakeholders. The ASC Farm Standard pilots will supplement consultation feedback in considering amendments to proposals.

Once all feedback is integrated, an updated audit mechanism for slaughter and an updated indicator to cover eyestalk ablation will be submitted to the ASC Technical Advisory Group for endorsement in July 2023.

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

Acronyms

Acronym	Definition
ASC	Aquaculture Stewardship Council

CAB	Conformity Assessment Body
CAR	Certification and Accreditation Requirements
NGO	Non-Governmental Organisation
OWI	Operational Welfare Indicators
RUoC	Requirements for the Unit of Certification
SC	Stakeholder Consultation
TAG	Technical Advisory Group
TWG	Technical Working Group
TWG	Technical Working Group

Annex: List of respondents – Slaughter Audit Mechanism

Organisation (Stakeholder)	Contact Person
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
Aldi Einkauf SE & CO oHG	Laurenz Mehlich
AMITA Corporation	Wataru Koketsu
AMITA Corporation	Chiko Tsukazaki
Animal Rights Center	Chihiro Okada
Aquatic Life Institute / Aquatic Animal Alliance members	Tessa Gonzalez
ASI	Francisco Javier Padilla Magan

ASI	Linh Nguyen
ASI	Boris Sulzberger
British Columbia Society for the Prevention of Cruelty to Animals (BC SPCA)	Melissa Speirs
Bureau Veritas Certification Holding SAS	Thanh Dao
CARREFOUR	Elsa De Deus
Cermaq Norway	Ingunn Johnsen
Compassion in World Farming (CIWF)	Elena Lara
Control Union Peru (CUP)	Andrea Guzmán
Control Union Peru (CUP)	Claudia Flores Coronado
Cromaris	Julija Smoljan
Dainichi Corporation	Masao Ueki
Dainichi Corporation	Mr Yuta
Dainichi Corporation	Yosuke Takeda
Danish Aquaculture Association	Lisbeth J Plesner
Deutscher Tierschutzbund	Katrin Pichl
Djurens Rätt	Linda Björklund
DNV Business Assurance Italy S.r.l.	Rosendahl Kristiansen
DNV Business Assurance Italy SRL	Mario Corti
Earthworm Foundation	Florie Hovine
Edeka Südwest Fleisch	Lisa Maxi Karpeles
Equalia	Miriam Martínez Macipe
Eurogroup for Animals	Douglas Waley
FishEhtoGroup Association	Fábio Barroso
Global Trust Certification Limited	Spyros Nikolakakis

Grand Frais/Prosol	Maxime Engler
Grieg Seafood BC Ltd.	Kristin Storry
Grieg Seafood BC Ltd.	Luke Pletsch
Hatko Teknik Donanimlar Mumessillik Ve Tic. A. S.	Mert Bozkurt
Hilton Seafood UK	Teresa Fernandez
Independent	Freddy Andres Chavez Bolivar
Intertek Testing Services Ltd.	Lionel Liu
Japan Fisheries Association	Tadatoshi Hayatake
JLB Management Consultancy Pty Ltd	Peter Lauer
Labeyrie Fine Foods	Manon Durbec
Macquarie University	Culum Brown
Maruha Nichiro	Yuta Hamasaki
Napier AS	Kine Olson
New England Seafood Ltd	Duncan Lucas
New Generation seafood JSC	Van Huu Loc
NSF	Che King Lee
Oceanloop Kiel GmbH & Co. KG	Kilian Landsch
PICARD	Sidonie Malegeant
q.inspecta GmbH	Nina Ileva
RSPCA	Sean Black
Salmon Scotland	Iain Berrill
Seafresh Industry Public Company Limited (Seafarm)	Poh Lynn Ung
SGS Nederland BV	Nikki Den Boon

Shrimp Welfare Project	Aaron Boddy
Skretting Japan	Yoshiaki Ina
Skretting Japan	Hikaru Nagata
Stichting Wakker Dier	Anne Hilhorst
The Humane League	Shannon Davis
University of South Bohemia	Tomáš Pěnka
Welfarm	Gautier Riberolles
Woolworths	Playfair Hannay
Yumigahama Fisheries Co.	Ryouji Kuranaga

Annex: List of respondents – Eyestalk Ablation

Organisation (Stakeholder)	Contact Person
Albert Heijn	Emiel Beekwilder
Aldi Einkauf SE & CO oHG	Laurenz Mehlich
Animal Rights Center	Chihiro Okada
Aqualma/Groupe UNIMA	Marc Le Groumellec
Aquatic Life Institute / Aquatic Animal Alliance members	Tessa Gonzalez
Blue Aqua International Pte Ltd	Erika Chong
British Colombia Society for the Prevention of Cruelty to Animals (BC SPCA)	Melissa Speirs
Camara Nacional de Acuacultura (CNA)	Yahira Piedrahita
CARREFOUR	Elsa De Deus
Compassion in World Farming (CIWF)	Elena Lara
CP Foods	Prakan Chiarahkhongma
Crustacean Compassion	Ben Sturgeon

Crustacean Compassion	Russell Whiting
Deutscher Tierschutzbund	Katrin Pichl
Djurens Rätt	Linda Björklund
Earthworm Foundation	Florie Hovine
Edeka Südwest Fleisch	Lisa Maxi Karpeles
Equalia	Míriam Martínez Macipe
Eurogroup for Animals	Douglas Waley
Grand Frais/Prosol	Maxime Engler
Hilton Seafood UK	Teresa Fernandez
INVE Thailand	Andy Shinn
Japan Fisheries Association	Tadatoshi Hayatake
Marine Technologies	Santhana Krishnan
Migros-Group	Nicole Fischer
New Generation seafood JSC	Van Huu Loc
Oceanloop Kiel GmbH & Co. KG	Kilian Landsch
PICARD	Sidonie Malegeant
RSPCA	Sean Black
SEAFDEC Aquaculture Department	Celia Lavilla-Pitogo
Seafresh Industry Public Company Limited (Seafarm)	Poh Lynn Ung
Seajoy	Alberto Obregon
Shrimp Welfare Project	Sasha Saugh
Shrimp Welfare Project	Jimenez Zorrilla
Shrimp Welfare Project	Aaron Boddy
Stichting Vissenbescherming	Paul Denekamp
Stichting Wakker Dier	Anne Hilhorst
Stirling University	Simao Zacarias
The Humane League	Shannon Davis
U.S. Grains Council	Ronnie Tan

University of South Bohemia	Tomáš Pěnka
Welfarm	Gautier Riberolles
Woolworths	Playfair Hannay
WWF (Including submissions from WWF Malaysia, WWF Sweden and WWF US)	Various