

ASC Certification and Accreditation Requirements (CAR)

2024 Stakeholder Consultation Summary

February 2025



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Consultation overview

What did the consultation cover?

The ASC Certification and Accreditation Requirements outline the assurance requirements and processes that will support the ASC Farm Standard and the ASC Feed Standard certification programmes.

The new version of the ASC CAR includes several changes, including:

- 1. Streamlined the audit process; from application to certification.**
- 2. Simplification of Group certification requirements and development of a separate document containing Group certification requirements for farms**
- 3. Updated to critical non-conformity actions.**
- 4. Amended auditor and CAB personnel competencies.**
- 5. Amended unannounced audit programme that is based on number of Clients**

Consultation overview

The consultation survey was accessible on the ASC website for 35 days from 23 September – 27 October 2024.

We received 22 responses to our survey, including from 9 CABs and auditors. Some sent feedback outside of the survey.

Stakeholders were asked for both quantitative and open text responses on their current practices and on the consultation proposals.

The new version of the CAR will become effective in 2025.

Overview of feedback

Stakeholders broadly supported the proposals for improving clarity, unannounced audits, and certification scope changes but raised concerns about costs, supply chain challenges, and feasibility.

Opinions were split on ASC versus CAB-developed risk tools, minimum audit requirements, and auditor competencies, with calls for more flexibility and clarity.

Concerns included shrimp farm price fluctuations, time burdens for larger groups, and challenges for niche or regional audits.

Most supported proposed sanctions and timelines for certificate withdrawal, though some preferred longer periods to incentivize compliance.

Harvest witnessing and language requirements also sparked mixed feedback, with some emphasizing practicality and stakeholder inclusivity.

Participation

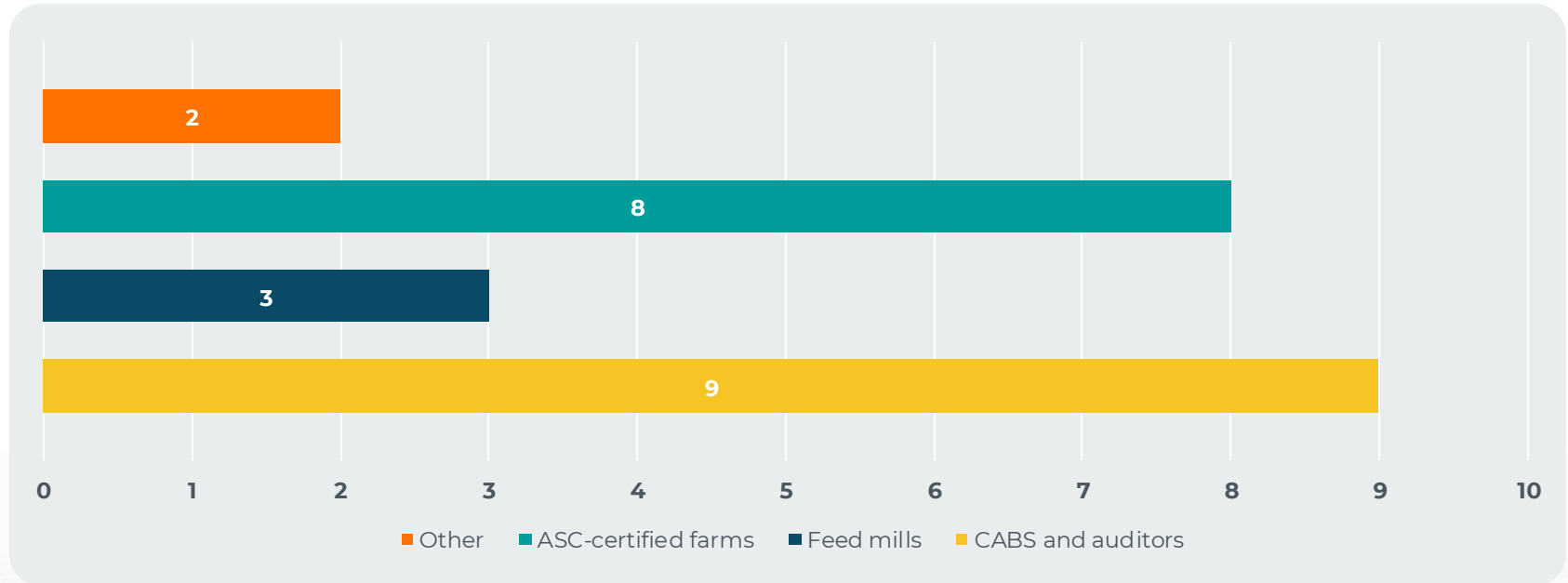


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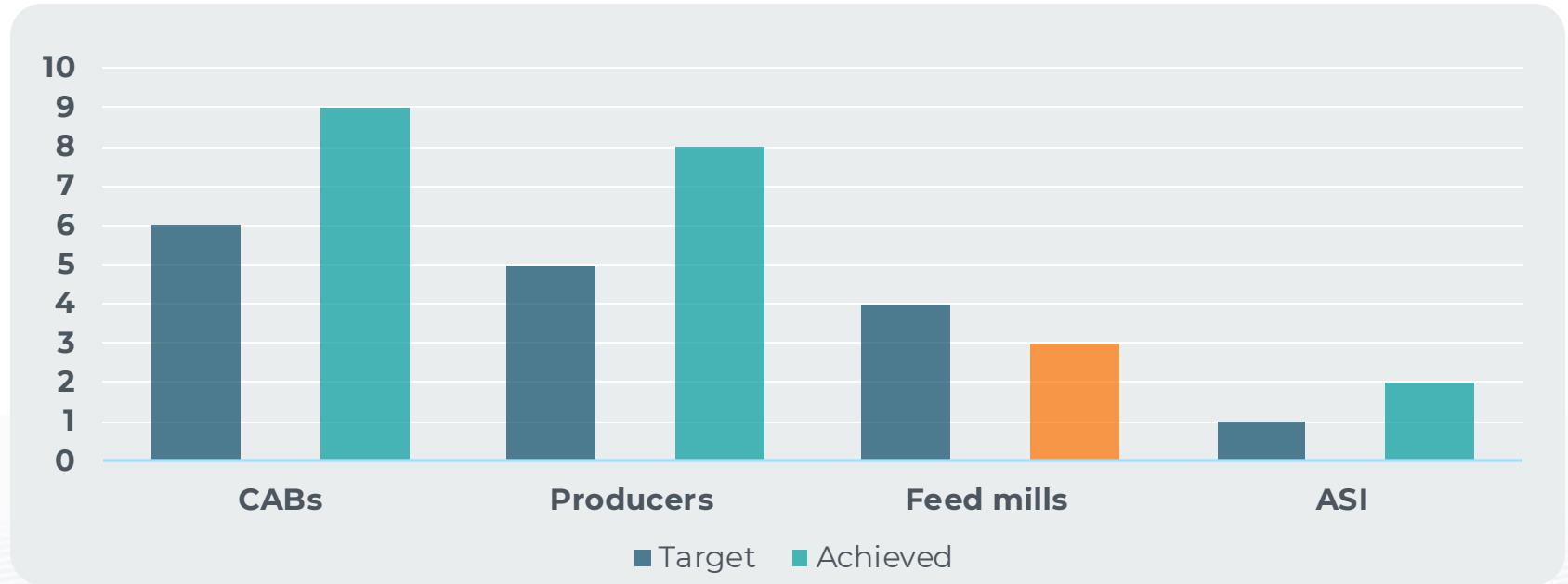
Participation: stakeholder type

We received 22 responses to our survey, from the following stakeholder types:



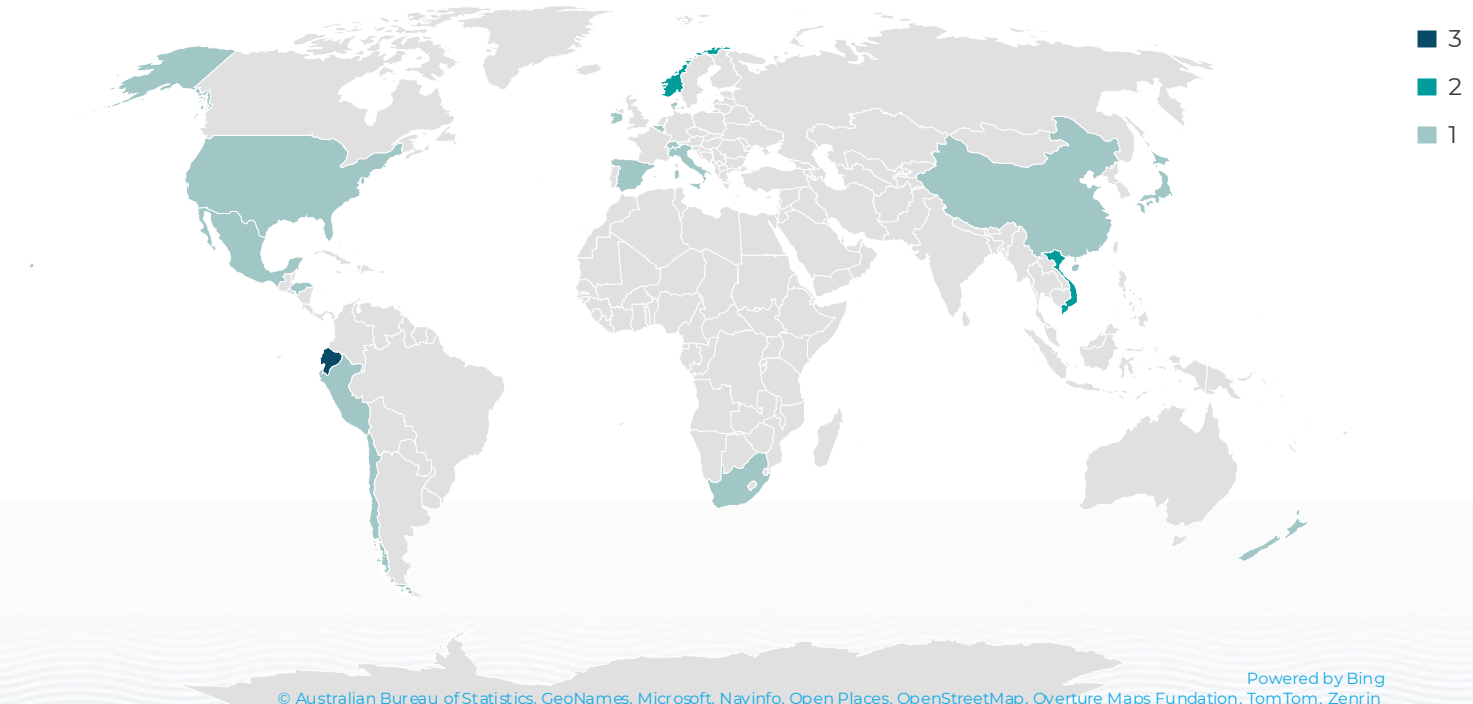
Progress against engagement targets per stakeholder groups

We met our engagement targets for all stakeholder types except feed mills. Feed mills aren't the primary audience for the CAR so further outreach on changes not prioritised.



Participation: country

We received 22 responses to our survey, from the following countries:

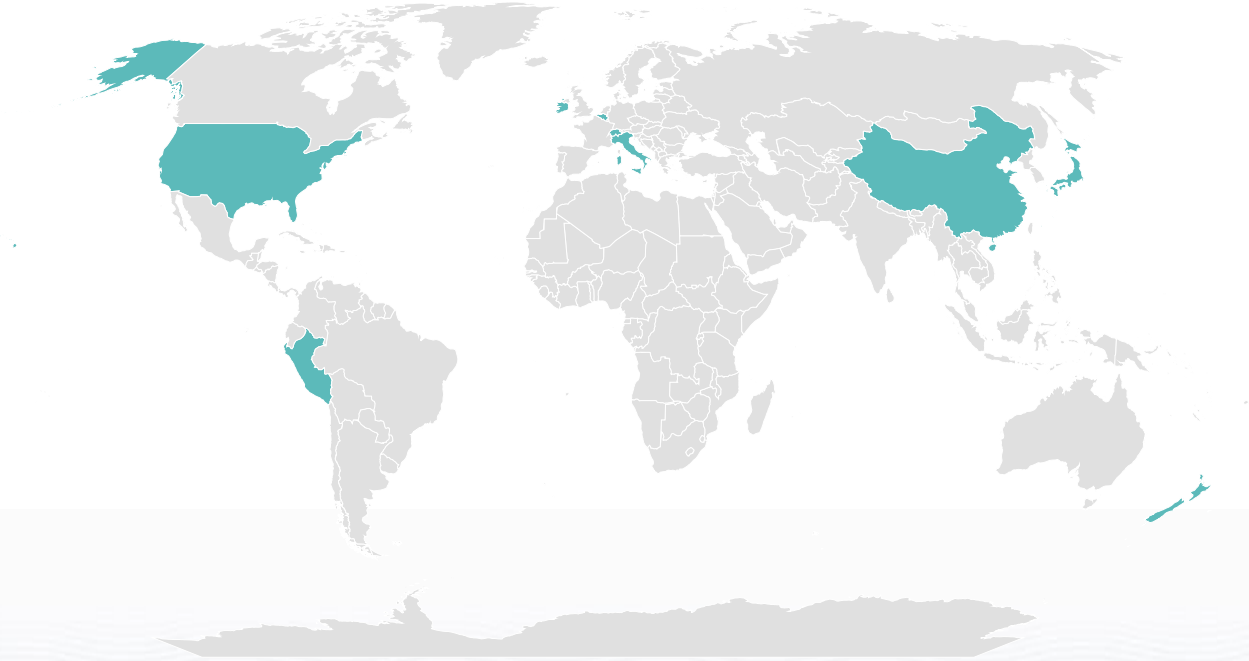


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Participation: CABs by country

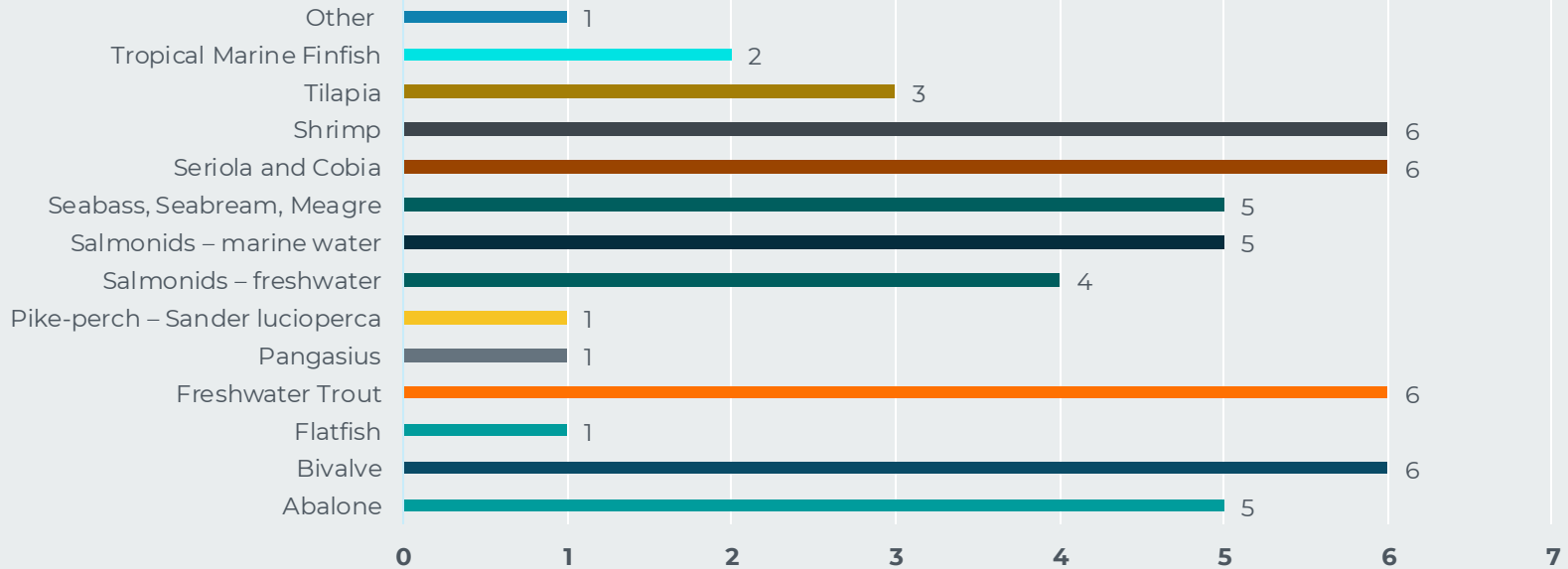
9 CABs responded to our survey, from the following countries:



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CABs: main species

We received feedback from CABs auditing the production of various species



Topic one:

Scope of certification



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Scope of certification: overview

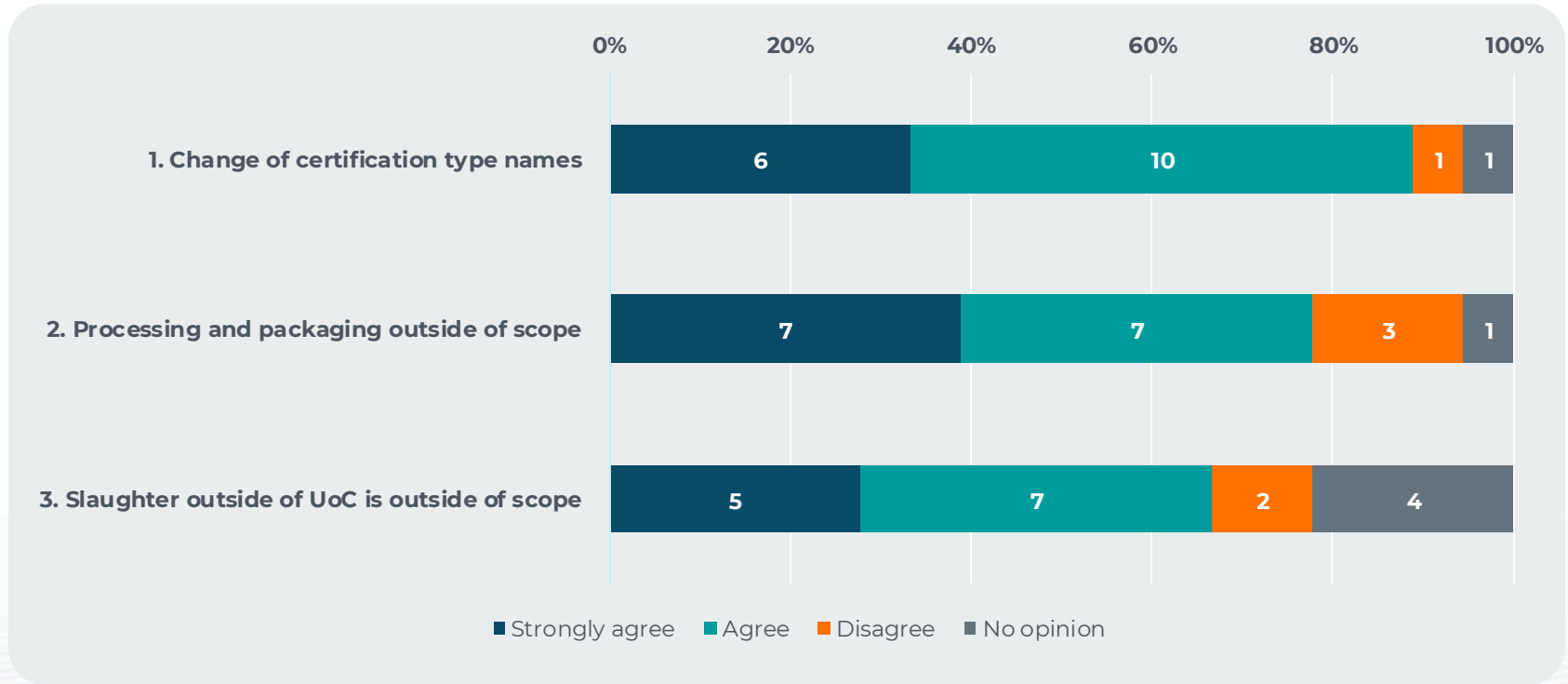
Stakeholders were asked to give feedback on changes in relation to scope of certification

	What ASC proposed	Outcome following consultation
1	To facilitate the merging of previous Multi-site Option 2 and Group Requirements, ASC is changing the Certification Types to: Single Site; Multi-site (Previously Multi-site Option 1) ; Group – Option 1 (Previously Multi-site Option 2); Group – Option 2 (Previously Group)	Implemented
2	Processing and packing are no longer included in the scope of Farm Standard certification and separate Chain of Custody certification will be required for these activities	Implemented
3	Slaughter that occurs outside of the Unit of Certification (UoC) shall not be included in the scope of certification	Implemented

Overview of stakeholder feedback

The proposed certification scope changes were broadly supported for improving clarity, a small number of stakeholders raised concerns about costs, audits, and supply chain challenges. Some preferred maintaining requirements and sought clarification on managing excluded activities.

Scope of certification: agreement on proposals



Scope of certification: summary of comments

1. Change of certification type names

- Most stakeholders supported the proposed changes to certification type names.
- While support was widespread, one CAB raised objections.
- Several stakeholders emphasised that the changes should not affect the existing requirements associated with the certification types.
- Some CABs also noted that their clients would not be directly impacted by this change.

2. Exclusion of processing and packaging from scope

- The proposal to remove process and packing activities from the certification scope was well-received overall.
- Most CABs, farms, and all feed mills endorsed the change, noting that it would bring greater clarity and practicality to the certification process.
- However, one ASC-certified feed mill and two CABs expressed concerns, highlighting that the change could lead to additional audit events, increased costs, and challenges with simple primary processing, which they view as low risk.

3. Exclusion of slaughter outside the UoC from scope

- The proposal to remove process and packing activities from the certification scope was well-received overall.
- Most CABs, farms, and all feed mills endorsed the change, noting that it would bring greater clarity and practicality to the certification process.
- However, one ASC-certified feed mill and two CABs expressed concerns, highlighting that the change could lead to additional audit events, increased costs, and challenges with simple primary processing, which they view as low risk.

Topic two:

Unannounced audits



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Unannounced audits: overview

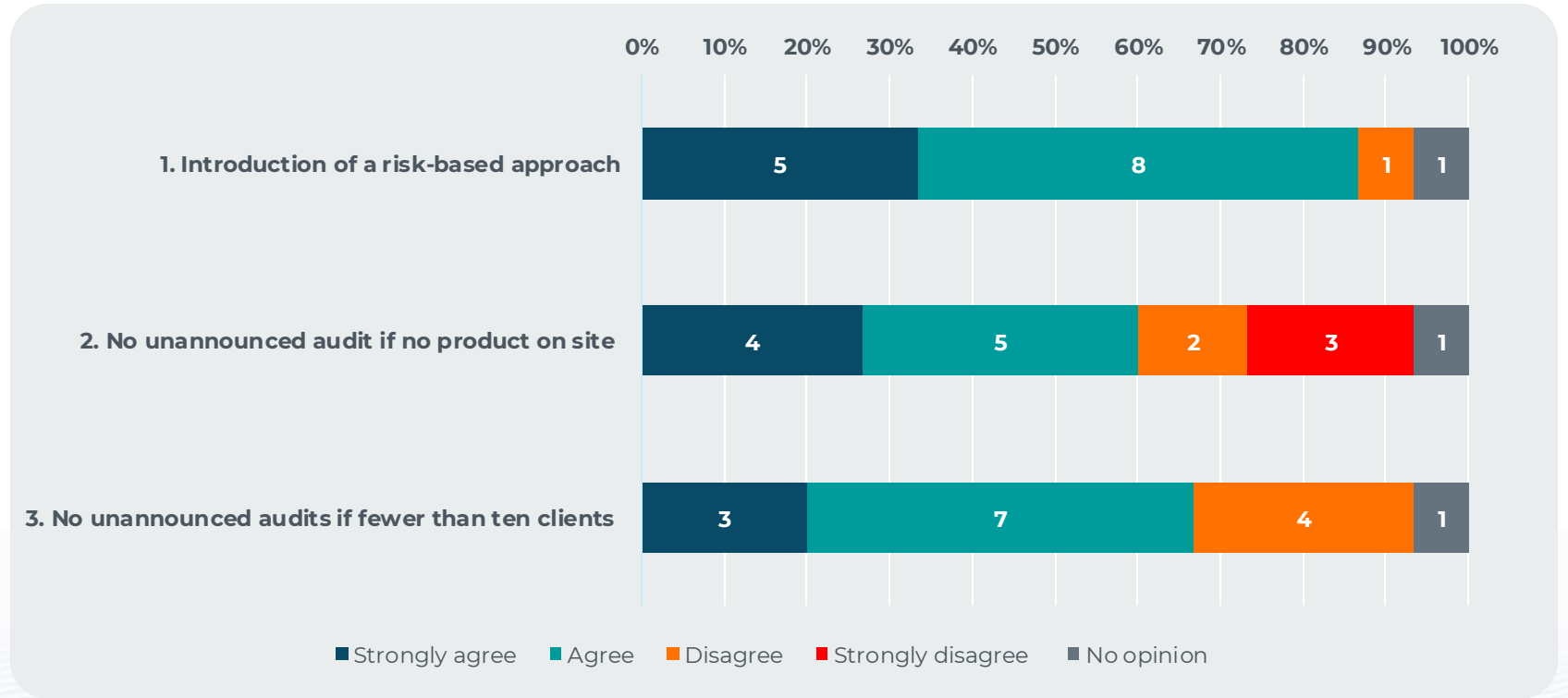
Stakeholders were asked to give feedback on changes in relation to unannounced audits

	What ASC proposed	Outcome following consultation
1	Replacing the risk evaluation table with a risk-based approach, which considers the specific risk factors to determine the sites to undergo unannounced audits.	Implemented with flexibility for CABs to include their own additional risk factors
2	Specifying that a surveillance or re-certification audit without product on site cannot be unannounced.	Implemented
3	No requirement for CABs to conduct unannounced audits if they have ten or fewer certified sites per programme.	Implemented

Overview of stakeholder feedback

The feedback showed general support for unannounced audits but raised concerns about ASC's risk factors, audit implementation, and notification periods. Stakeholders were split on whether ASC or CABs should develop risk tools, with some proposing additional risk factors. While most supported unannounced audits, some CABs cited practical challenges, and others opposed the "fewer than ten clients" rule, suggesting alternative methods for smaller CABs.

Unannounced audits: agreement on proposals



Unannounced audits: summary of comments

1. Introduction of a risk based approach

- General support for unannounced audits, though a feed mill and a CAB raised concerns about the risk factors.
- There were mixed views on ASC developing a risk tool vs. CABs creating their own, with additional risks suggested.
- Concerns about lack of clarity on audit reduction and announcement periods. Debate over unified vs. individualised CAB approaches for regional risks.
- One CAB expressed that the 48-hour notifications may allow issues to be concealed, as well as opposition to exceptions for travel/logistics during audits.

2. No unannounced audit if no product on site

- Most stakeholders agreed or strongly agreed with the proposal
- Some CABs, however, strongly disagreed with it because it is difficult for the CAB to confirm whether there is product on-site without asking the client directly.

3. No unannounced audit if fewer than ten clients

- Most stakeholders agreed or strongly agreed with the proposal
- Four CABs disagreed with the proposal
- Three stakeholders also suggested ASC consider another figure or method for smaller CABs to use.

Topic three:

Auditor competencies



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Scope of certification: overview

Stakeholders were asked to give feedback on changes in relation to auditor competencies

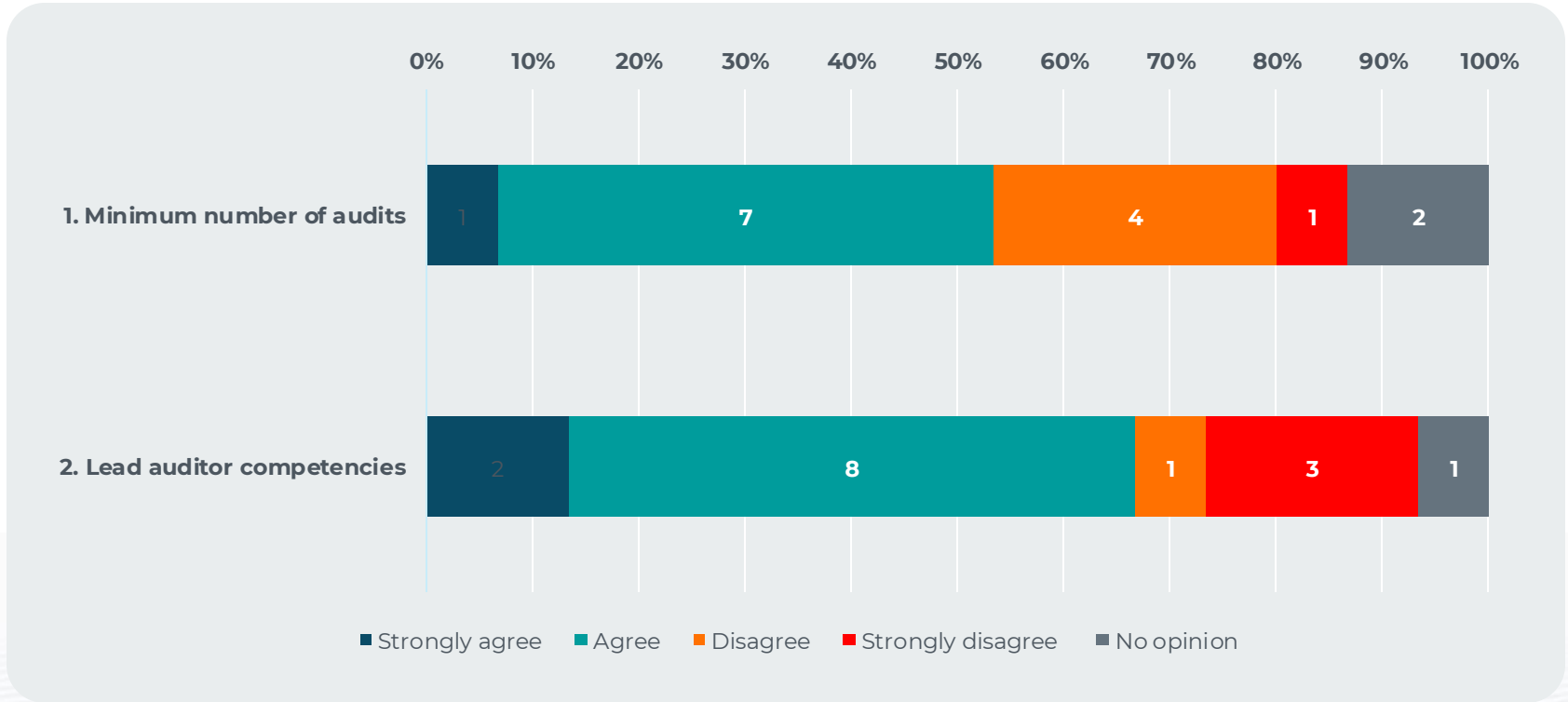
What ASC proposed		Outcome following consultation
1	A minimum number of ASC audits to be completed each year: one or two per CAB depending on the auditor role	Implemented but over two years rather than one
2	All ASC Farm Standard environmental auditors must have lead auditor competency requirements (as 90% already do)	Implemented

Overview of stakeholder feedback

Stakeholder feedback highlighted general support for proposals. While most supported minimum audit requirements and lead auditor training competencies for environmental auditors, exceptions and the inclusion of social auditors as lead auditors were proposed (both social and environmental auditors can hold the lead auditor role).

Opposing views cited issues with capacity, costs, and practical feasibility, including regional audit limitations, auditor illness and maternity leave. Suggestions included setting a two-year minimum instead of yearly.

Auditor competencies: agreement on proposals



Auditor competencies: summary of comments

1. Minimum number of audits

- Most CABs and all farms/feed mills supported the proposal, though one CAB called for exceptions (e.g., illness, maternity, regional availability) and one farm suggested higher minimums.
- Five CABs opposed it, citing concerns about capacity, cost, complexity, and unclear witnessing requirements for auditors below the minimum threshold. Suggestions included addressing exceptions and setting a two-year minimum instead of yearly.

2. Environmental auditors must meet lead competencies

- Most CABs and all farms supported the idea, while emphasizing that social auditors should be eligible as lead auditors.
- However, three CABs and one feed mill opposed it, citing concerns about longer qualification times, the lead auditor role not being tied to auditor type, and the exclusion of experienced social auditors in favor of less experienced environmental auditors.

3. Other comments

- CABs raised several concerns, including difficulties finding auditors for niche types like RAS and opposition to differing audit minimums for Farms and Feed auditors.
- Limited regional clients were noted as a barrier to annual audits, and the shift to ten auditor days for management systems was deemed unjustified.
- Clarity was requested on technical reviewer competencies and internal auditor onboarding.

Topic four:

Certificate withdrawal



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Certificate withdrawal: overview

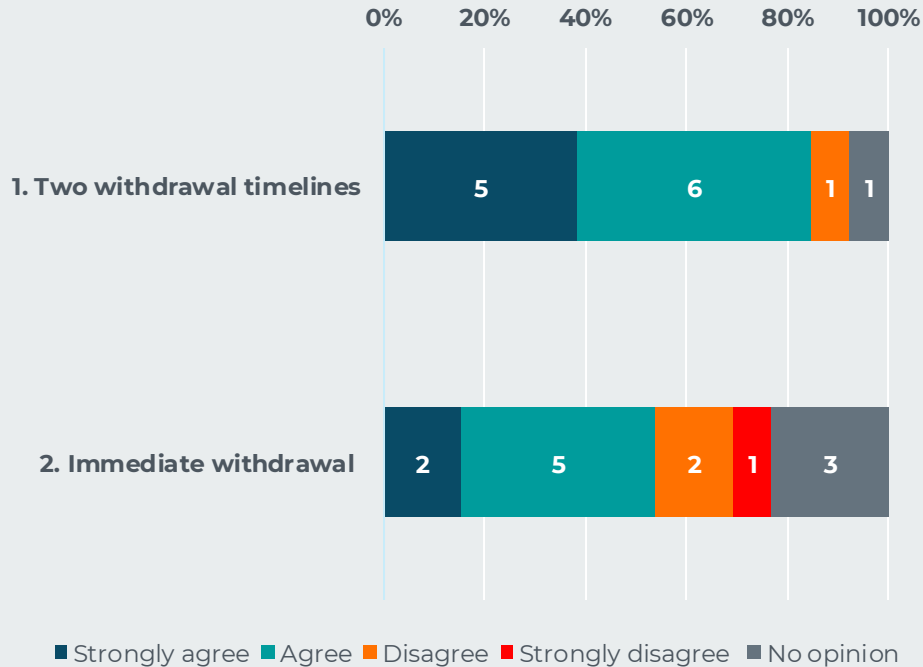
Stakeholders were asked to give feedback on changes in relation to certificate withdrawal

	What ASC proposed	Outcome following consultation
1	Implementing two certificate withdrawal timelines: 12 and 24 months, depending on specified criteria.	Implemented
2	Amending the assurance process in the event of a critical non-conformity to introduce immediate withdrawal in place of suspension where a critical NC is prescribed in the Farm Standard.	Not implemented as intent in Standard changed
3	The consideration of an assurance consequence for clients who fail to notify their CAB as an additional penalty.	Not implemented as adds complexity

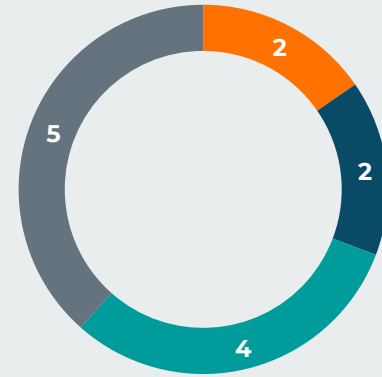
Overview of stakeholder feedback

Most stakeholders (84%) supported the proposed timelines for certificate withdrawal, sanctions for failure to notify, and the process for critical non-conformities. One CAB disagreed with the 12-month withdrawal, favouring 24 months to incentivise clients. While most supported sanctions of 6, 12, or 24 months, two CABs opposed them. Three CABs also disagreed with immediate certificate cancellation, suggesting a 6-month suspension for better investigation and accountability.

Certificate withdrawal: feedback on proposals



3. Consequences for clients who fail to notify



- No sanction - I don't agree with this approach
- Certificate withdrawal for 12 months
- Certificate withdrawal for 24 months
- Other

Scope of certification: summary of comments

1. Two timelines for certificate withdrawal

- A large majority of stakeholders agreed or strongly agreed with the proposal
- One CAB disagreed with the 12-month criteria but agreed with the 24-months. Their rationale was that ASC should want to incentivise the client to remain in the ASC programme and therefore make them more likely to close the critical non-conformity.

2. Sanction for failure to notify

- All respondents, excluding two CABs, supported a sanction of either 6, 12 or 24 months.

3. Process for critical non-conformity

- Most stakeholders agreed or strongly agreed with the proposal
- Three CABs disagreed or strongly disagreed with the proposal as a 6-month suspension could be used instead to allow for a proper, formal investigation that cannot be done in 24 hours. Additionally, if the certificate is cancelled, the client will have no incentive to close the non-conformity.

Topic five:

Group requirements



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Group requirements: overview

Stakeholders were asked to give feedback on changes in relation to group requirements

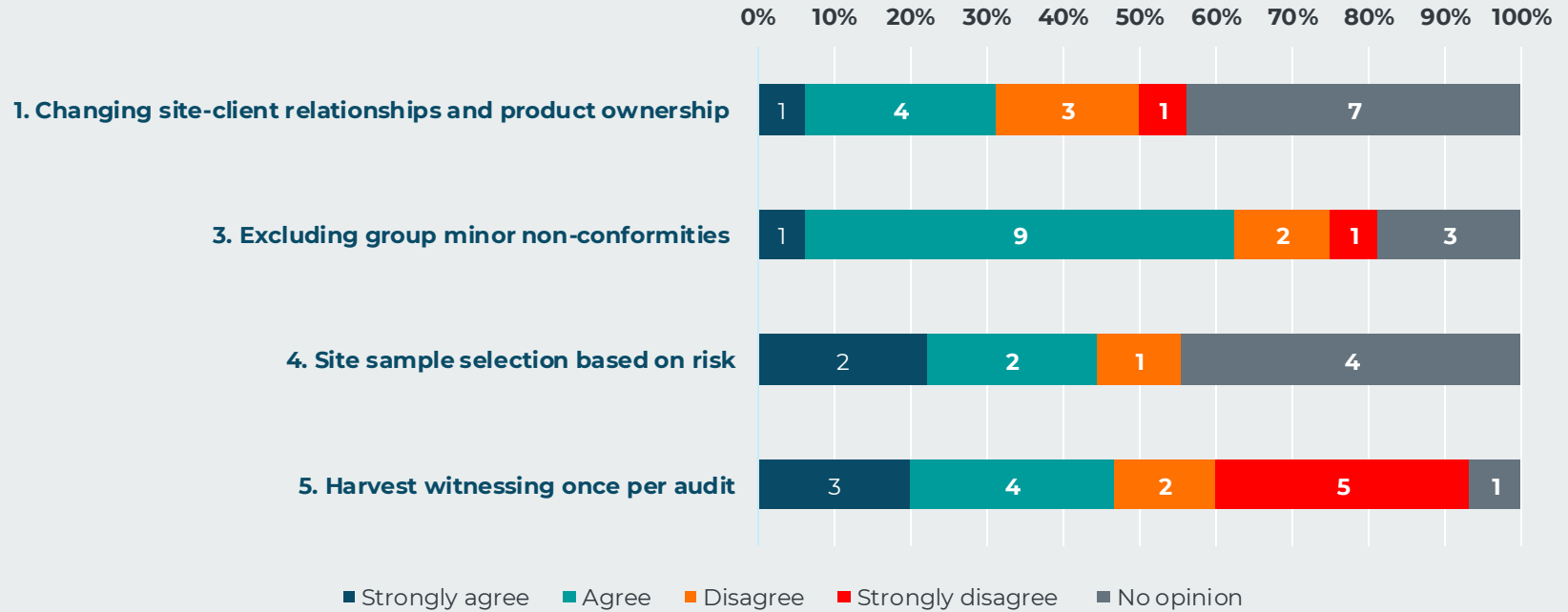
	What ASC proposed	Outcome following consultation
1	<p>Prescribing the permitted site-client relationships and product ownership for certification types.</p> <p>Feedback: <i>Most respondents stated the proposal on site-client relationships and product ownership would have minimal impact on clients</i></p>	Implemented
2	<p>Two proposed options for the sequence of events for scheduling group audits.</p> <p>Feedback: <i>CABs and farms preferred flexibility in group audit sequencing, though concerns were raised about time burdens for larger group traceability exercises.</i></p>	Implemented giving flexibility to CAB to choose either option
3	<p>Excluding group minor non-conformities, while allowing group critical or major non-conformities.</p> <p>Feedback: <i>CABs indicated this poses a challenge to raise 'minor' non-conformities at a Group audit.</i></p>	Not implemented, CAR text to include group minor

Group requirements: overview

Stakeholders were asked to give feedback on changes in relation to group requirements

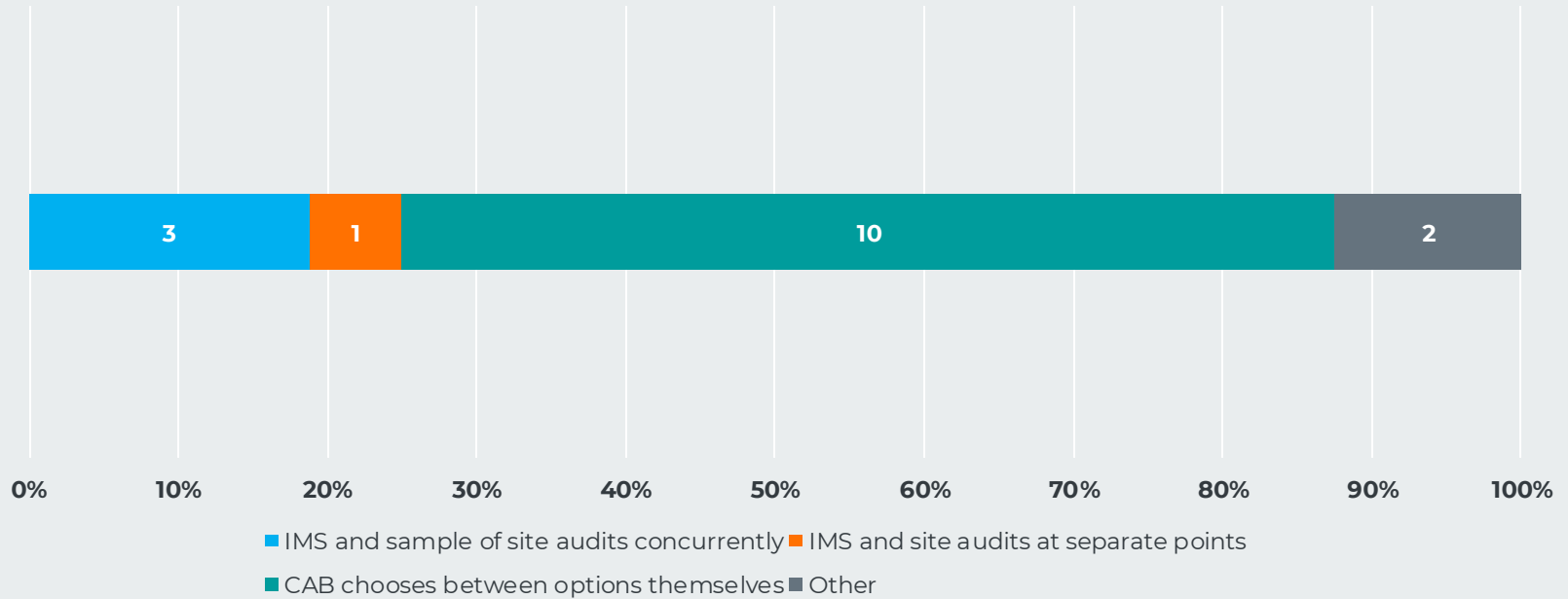
	What ASC proposed	Outcome following consultation
4	<p>Replacing the risk assessment table with a new set of factors to determine site sample selection for group audits</p> <p>Feedback: <i>CABs were divided on developing a risk assessment tool for site sample selection, with some favoring ASC's involvement to avoid accreditation issues. Feedback emphasized the need for sufficient time to implement corrective actions and clarity on handling critical NCs for groups.</i></p>	<p>Implemented, term 'small-scale farmer' retained, site sample size to be stratified by volume</p>
5	<p>Harvest to be witnessed at least once during every CAB routine group audit of the selected sample of sites</p> <p>Feedback: <i>Regarding harvest witnessing, opinions were mixed, with some supporting shorter audit windows and others favoring annual witnessing to address logistical and species-specific challenges.</i></p>	<p>Implemented and text clarified</p>

Group requirements: feedback on proposals



Group requirements: feedback on proposals

2. Preferable option for group audit sequencing



Group requirements: summary of comments

1. Site-client relationships and product ownership

- Most respondents stated that this proposal would have little to no impact on their clients

2. Sequence of events for group audits

- Most CABs and all farms/feed mills preferred that the CAB chooses between the options themselves.

3. Excluding group minor non-conformities

- One farm brought up that shrimp farms are facing difficulties because shrimp prices fluctuate and this proposal would impact them.
- One CAB wanted to re-iterate that time should be given for clients to show effective implementation of the corrective actions. Additionally, there still may be minor NCs for small issues
- One CAB shared that it is not clear how a CAB shall close a critical NC for a Group

Group requirements: summary of comments

4. Site sample selection based on risk

- One CAB stated that the traceability and input/output exercises will be too time consuming if the group is more than a few sites.
- One CAB opposed the proposal, citing risks from ASI incidents without an ASC risk assessment.
- CABs were split on whether ASC or CABs should develop the tool, with some favoring flexibility and others preferring ASC to avoid accreditation issues.
- A CAB raised concerns about the time burden of traceability exercises for larger groups.

5. Harvest witnessing once per audit

- Some CABs and farms supported the proposal, noting it could shorten audit windows but raised concerns about groups without production during audits due to conditions like climate, species, or group size.
- Some CABs and farms opposed the proposal, suggesting annual harvest witnessing instead of at every audit, citing challenges for long-cycle species, increased audit planning workload, and factors like travel costs and commercial planning.

Topic six:

Translations



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Translations: overview

Stakeholders were asked to give feedback on changes in relation to translations

What we are proposing

Audit reports may require translation into other languages for stakeholders. Under the new CAR, ASC is proposing to eliminate the requirement to translate audit reports to other languages: **Proposal implemented but still maintain the option for CAB to submit translated reports if requested by Stakeholders** (e.g. Japan). ASC will publish these translated reports.

Overview of stakeholder feedback

Most CABs supported the proposal, noting stakeholders typically understand English, and translation is inefficient given free resources are available. One CAB opposed, citing non-English-speaking stakeholders.

Translations: overview

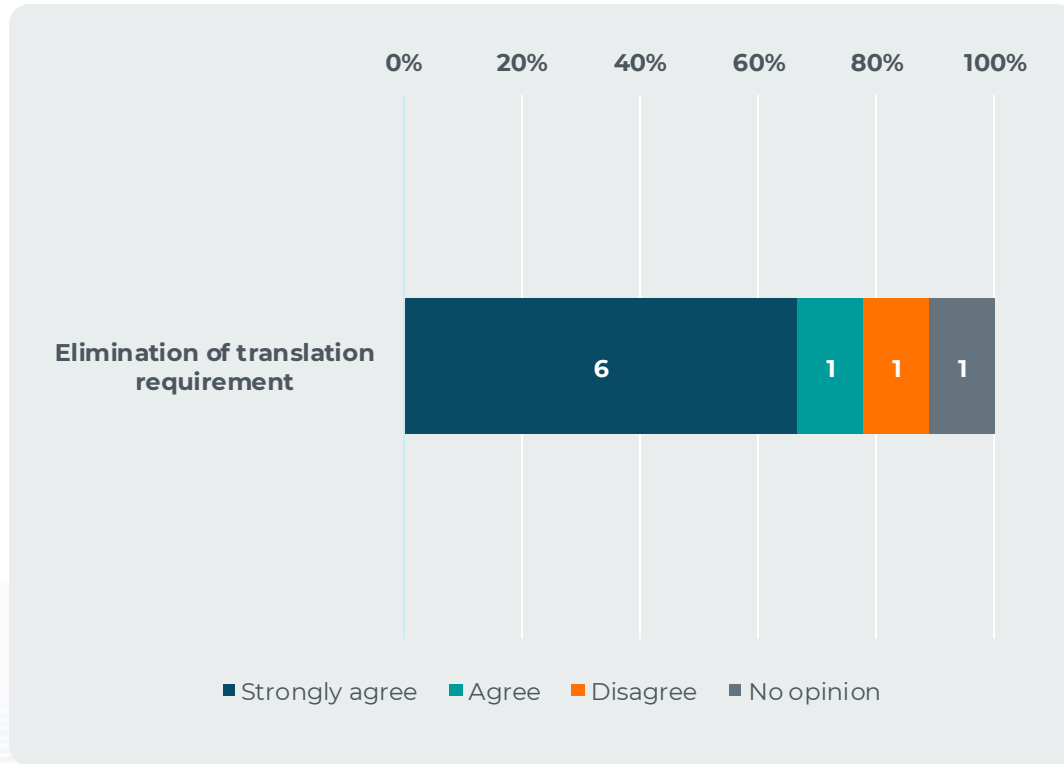
Stakeholders were asked to give feedback on changes in relation to translations

What ASC proposed	Outcome following consultation
1 Audit reports may require translation into other languages for stakeholders. Under the new CAR, ASC is proposing to eliminate the requirement to translate audit reports to other languages	Implemented but option maintained for CAB to submit translated reports if requested by stakeholders

Overview of stakeholder feedback

Most CABs supported the proposal, noting stakeholders typically understand English, and translation is inefficient given free resources are available. One CAB opposed, citing non-English-speaking stakeholders.

Translations: feedback on proposals



Eliminate requirement to translate audit reports

- All CABs, excluding one, had not received stakeholder comments in languages other than English in the last 12 months
- Most CABs supported the proposal as stakeholders are likely to understand English and felt that translating is an inefficient use of resources. They also noted that translation resources are now freely available.
- One CAB did not support this proposal as their stakeholders do not communicate in English

Additional feedback



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Additional feedback: summary of comments

1. Site-client relationships and product ownership

- CABs requested clearer guidance on audit requirements, Desk Review processes, financial responsibilities, and audit duration calculations.
- Feedback suggested annual consultations and aligning technical reviewer requirements with other schemes.
- Concerns were raised about limited data for ASC database uploads in cases of failed audits.

2. Feasibility and Practical Concerns

- One CAB stated it is not feasible to cover all ASC requirements in a single audit and suggested developing a list of critical indicators for focus.
- One CAB expressed concerns about sending documented NCs to clients within 1 working day due to travel and logistics.
- One CAB stated that the condition for extending NCs based solely on species production cycle is too limiting and suggested considering other factors, such as procurement.

3. Confidentiality and Decision-Making

- Two CABs raised concerns about being responsible for controlling and protecting confidential information submitted to ASC.
- One CAB noted the certification decision should not depend on an open variance request if unrelated to the Standard, allowing CABs to proceed with certification decisions independently.

**Thank you to all
stakeholders who
participated in the
consultation for
helping improve
the ASC CAR.**



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