

# ASC Feed Standard

Summary of the 2024 Consultation  
and ASC's response to feedback

January 2025



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Seafood**



# Consultation overview

ASC's Feed Standard tackles one of aquaculture's most significant impacts: the production and supply of feed for farmed fish.

- The ASC Feed Standard mandates feed mills to report energy use and GHG emissions, ensures ingredient supply chains are low risk for environmentally damaging activities and complies with environmental regulations.
- It also enforces human rights protections in supply chains and incentivises sourcing of ingredients from responsibly managed sites including fisheries.
- ASC are restructuring and improving relevant Feed Standard documentation to improve clarity and usability.
- As part of this process, **ASC has made changes within the ASC Feed Standard to greenhouse gas reporting requirements and to requirements around the use of suppliers and sites which have deforested or converted land.**

# Consultation overview

The following changes were proposed:

- 1. A new greenhouse gas (GHG) disclosure indicator requiring the reporting of species-specific data**
- 2. A new requirement to report GHG data using both relative mass and economic allocation calculation methods**
- 3. The cut-off date requiring no sourcing of plant raw materials from deforested or converted land is to be set at 31 December 2020.**

The changes were proposed either to align feed to farm reporting data with the upcoming new ASC [Farm Standard requirements](#), and to align with legislative requirements.



# Consultation overview

The consultation survey ran for 60 days from 9 September – 9 November 2024.

We received 44 responses to our survey, including from 18 feed mills.

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

ASC Feed Standard v1.1 will be published Q2 2025 and effective in May 2025.

## Overview of feedback

- Stakeholders broadly supported the proposals for improving environmental accountability, including species-specific GHG reporting and expanded deforestation-free standards.
- Key themes included the need for feasibility, flexibility, and alignment with frameworks like the ASC Farm Standard and EU PEFCR.
- Challenges were raised around data disaggregation, allocation methodologies, and regional adaptability, particularly for South American supply chains.
- Stakeholders emphasised the importance of clear guidance, transparency, and phased implementation to ensure feasible and effective adoption.

# Overview of changes made following consultation

- ✓ Minor revisions to appendices and guidance materials to improve clarity on species-specific requirement to ease cost and complexity for feed mills.
- ✓ Minor revisions to appendices and guidance materials to indicate some flexibility in GHG data collection, in recognition of specific data limitations.
- ✓ Promotion of and improvements to the ASC Greenhouse Gas Calculator Tool, including additional clarity on its methods and data sources.
- ✓ Introduction of flexibility to the deforestation/conversion cutoff in relation to lower risk ingredients.



# Stakeholder participation



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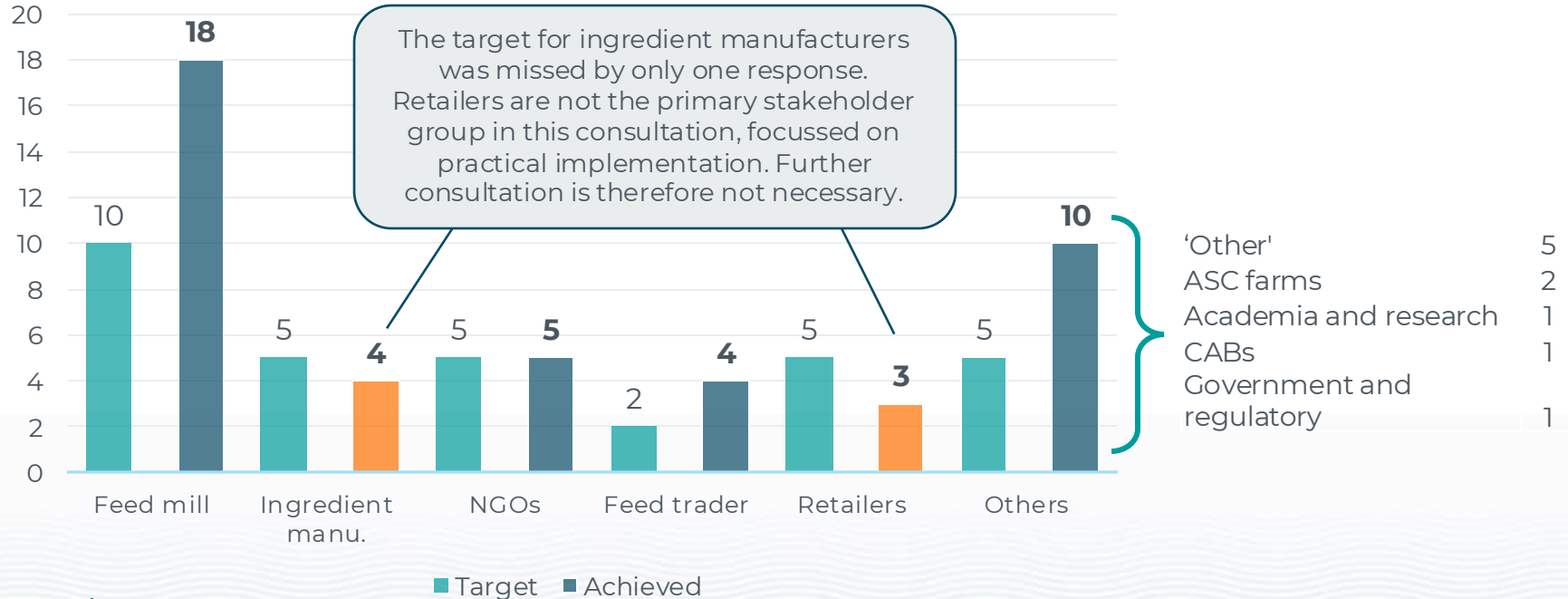
# Participation: stakeholder type

We received 44 responses to our survey, from the following stakeholder types:



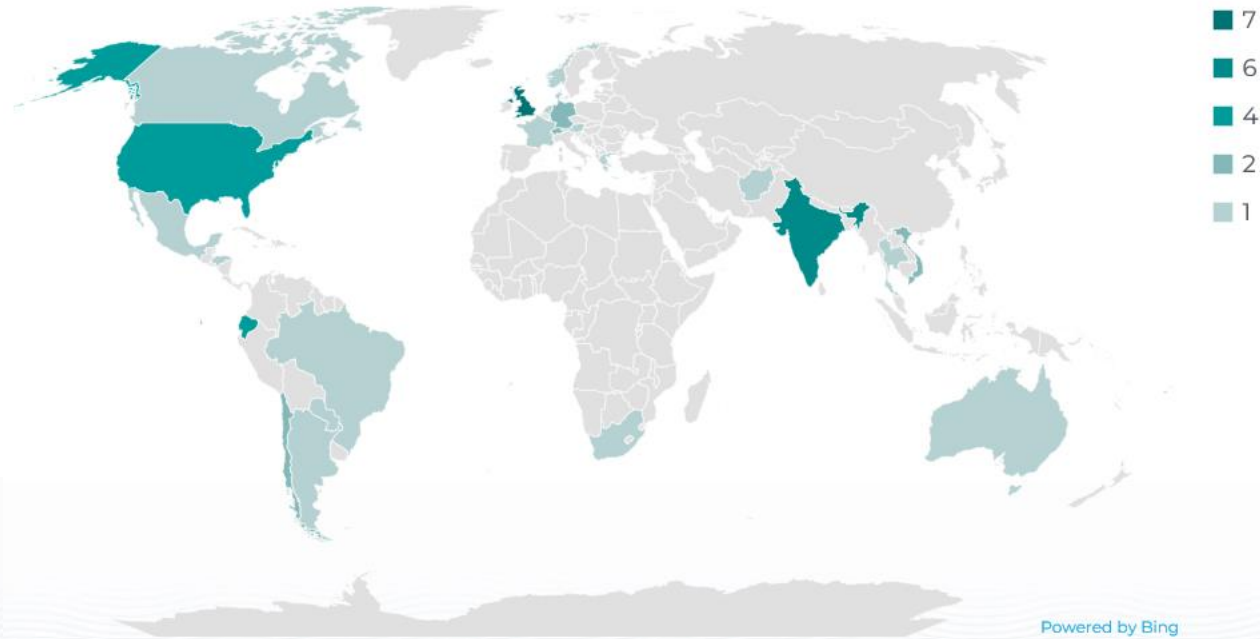
# Progress against engagement targets per stakeholder groups

We met our engagement targets for feed mills, NGOs and 'others', but not for ingredient manufacturers and retailers.



# Participation: country

44 people responded to our survey, from the following countries:

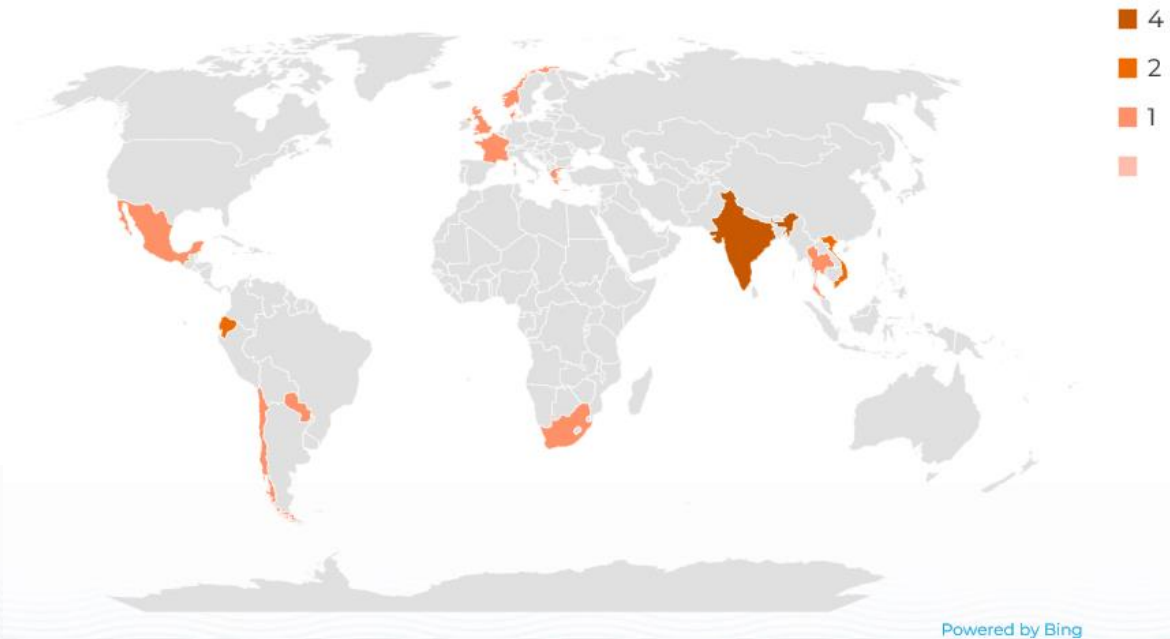


## Top participating countries

- 1. UK:**  
7 responses
- 2. India:**  
6 responses
- 3. USA & Ecuador:**  
4 responses

# Participation: feed mills by country

18 feed mills responded to our survey, from the following countries:

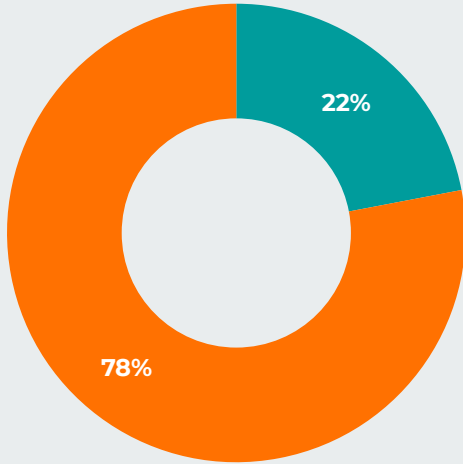


## Top participating countries

- 1. India:**  
4 responses
- 2. Ecuador & Vietnam:**  
2 responses

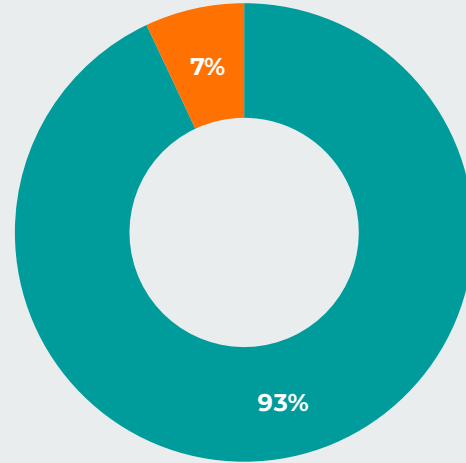
# Feed mills: ASC certification

22% of survey respondents are currently certified, but 93% plan to be in the future



■ Yes ■ No

Are you an ASC certificate holder?

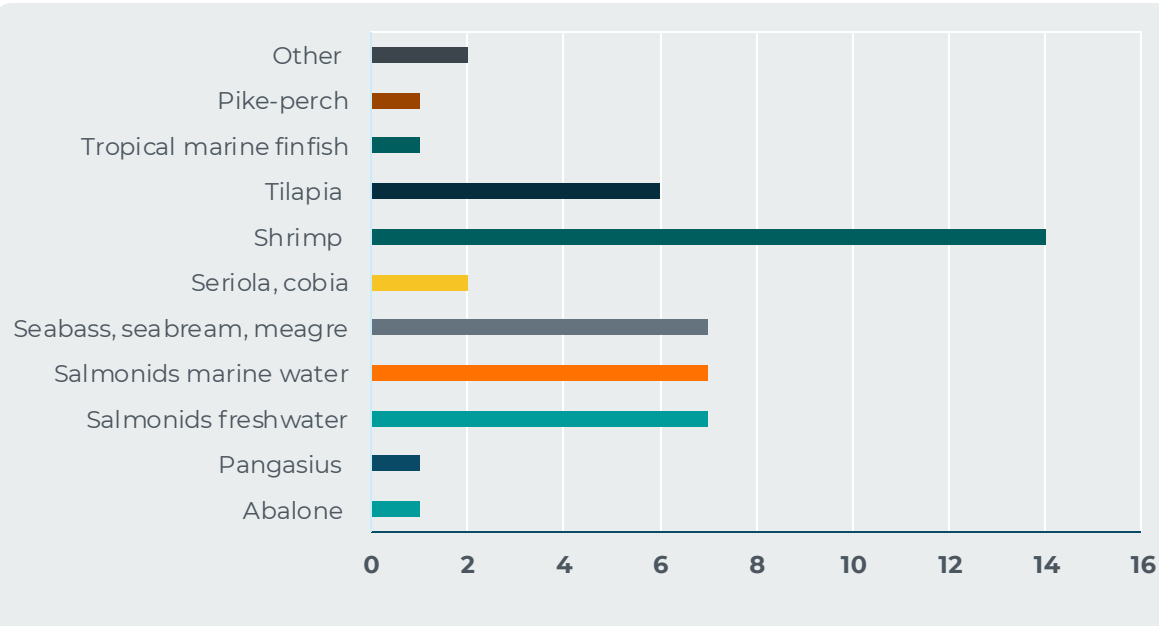


■ Yes ■ No

Are you seeking ASC certification in the future?

# Feedmills: main species

We received feedback from feed mills supplying feed to various species



## Top species participation

- 1. Shrimp:**  
14 responses
- 2. Salmon;  
seabass,  
seabream,  
meagre:**  
7 responses
- 3. Tilapia:**  
6 responses

**Topic one:**

# **Species-specific greenhouse gas collection**



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# Species-specific GHG reporting: overview

**Stakeholders were asked to give feedback on the proposal to require species-specific GHG data**

## What we are changing and why

- The [new ASC Farm Standard](#) requires farms to acquire GHG emissions data from their feed suppliers. The current ASC Feed Standard v1.01 only requires GHGs to be reported for total ASC-conforming feed. This may result in less relevant feed GHG data being provided to farms
- The changes require feed mills to calculate and report to ASC GHG data that are species-specific and to report this to ASC-certified or applicant farms.

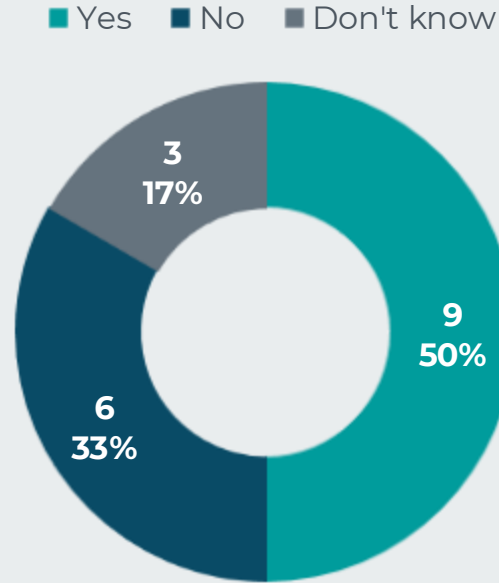
## Overview of stakeholder feedback

- Stakeholders supported species-specific GHG reporting for its accuracy, feasibility, and alignment with the ASC Farm Standard, though some feed mills noted challenges without support, training, and clearer methodologies.
- Concerns included regional limitations, data disaggregation for multi-species mills, and differing preferences for reporting approaches. Alignment with the EU's PEFCR was also suggested.

# Species-specific GHG reporting: current collection

Feed mills were asked if they already collect GHG data to a species-specific level.

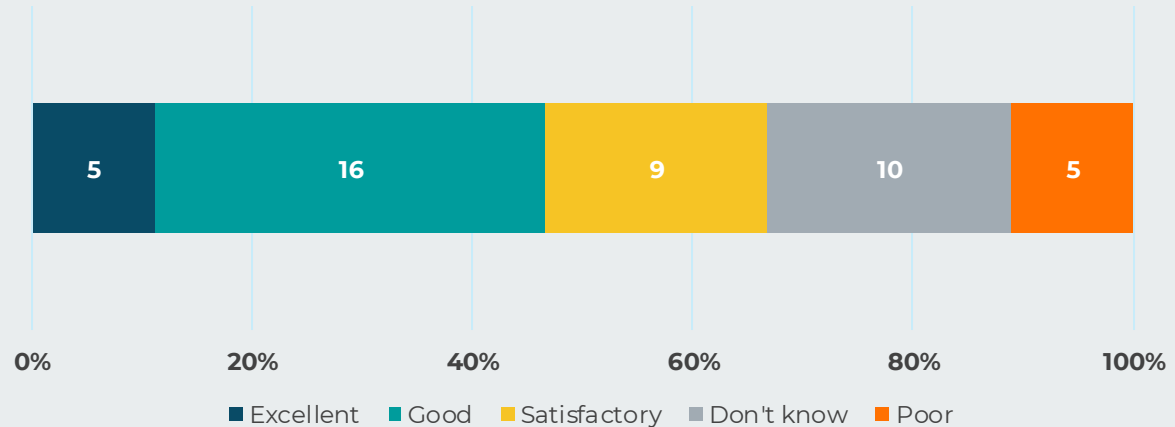
**50%** said that they do:



# Species-specific GHG reporting: proposal rating

All stakeholders were asked to rate this amendment for ease of implementation.

**67%** gave a rating of satisfactory or above:



# Species-specific GHG reporting: summary of comments

## Positive

- Feed mills and NGOs value species-specific GHG reporting, considering it both achievable and beneficial for accuracy and supply chain efficiency.
- Some feed mills already implement species-specific reporting.
- Aligning with the ASC Farm Standard was widely acknowledged as important.

## Suggested improvements

- Feasibility concerns were raised by some feed mills, especially without additional support.
- Stakeholders requested training on Scope 3 emissions and more transparency in methodology.
- Limitations in Scope 3 reporting were noted for certain regions, such as India.
- Challenges exist in relation to supply to multi or niche species due to data disaggregation issues.

## Further comments

- Differing preferences emerged: some stakeholders favored species-specific data, while others preferred a weighted average approach.
- Alignment with the EU's Product Environmental Footprint Category Rules (PEFCR) was suggested by a Norwegian feed mill.

# Species-specific GHG reporting: ASC response

## Consultation feedback

1. Concern about feasibility of disaggregating data for multi-species mills, especially for low-volume “niche” species.
2. Concern that Scope 3 emissions in some regions (India mentioned) face limitations for data reporting.



## ASC response

- Clarify that species-specific results are only required for species or species groups within the scope of the ASC Farm Standard.
- Use guidance materials to:
  - Recognise data limitations at regional and ingredient level
  - Accept relevant available data that meets the methodological requirements of the appendix;
  - Promote use of the ASC GHG Calculator.

**Topic two:**

**Relative mass and  
economic allocation (dual)  
reporting**



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# Dual method reporting: overview

**Stakeholders were asked to give feedback on the proposal to require both relative mass and economic allocation methods for reporting.**

## What we are changing and why

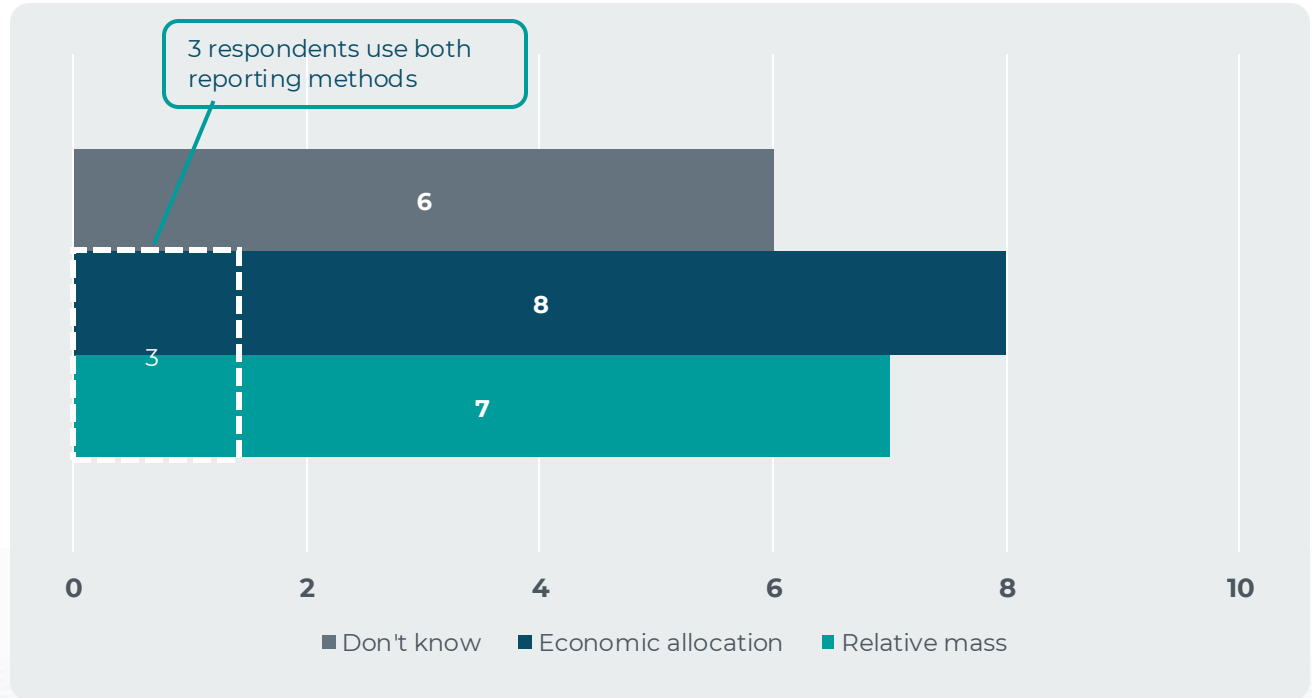
- The [new Farm Standard](#) requires farms to use both relative mass and economic allocation methods when calculating and reporting GHG emissions. The current Feed Standard allows either method to be used.
- The change will require the feed mill to use both when reporting its GHG emissions so that the farm can also use both, avoiding mixing methods if sourcing feeds from multiple suppliers.

## Overview of stakeholder feedback

- Consultation responses showed many feed mills already conduct integrated mass and/or economic allocation calculations
- However, feasibility concerns remain. Economic allocation is viewed as less complex than mass while requiring both methods is seen as duplicative.
- Stakeholders request ASC guidance, greater transparency, phased implementation, and alignment with EU The Environmental Footprint methods (PEFCR).

# Dual method reporting: current collection

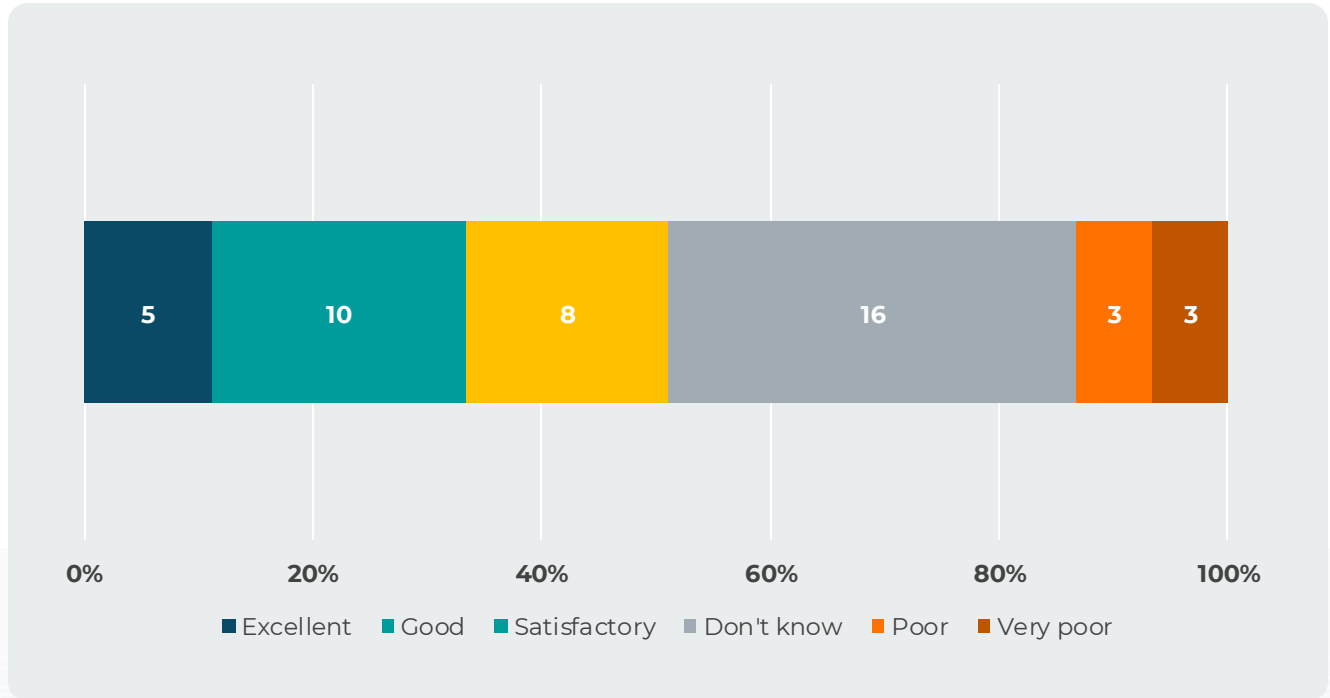
The 18 feed mills were asked what method of reporting they current use:



# Dual method reporting: proposal rating

All stakeholders were asked to rate this amendment for ease of implementation.

**51%** gave a rating of satisfactory or above:



# Dual method reporting: summary of comments

## Positive

- Our consultation revealed that some feed mills already integrated mass and/or economic allocation in their calculations
- Other respondents felt positively about integration of these new requirements and understood the benefit and its role in strengthening the feed programme's environmental remit

## Suggested improvements

- Without targeted support, implementation is seen as unfeasible due to varying levels of readiness among feed mills.
- Economic allocation is favoured over mass allocation as it aligns better with existing practices, reduces complexity, and minimises the learning curve for feed mills.
- Requiring both methods is viewed as duplicative by some feed mills.

## Further comments

- ASC should provide guidance on Scope 3 emissions and improve transparency in methodologies and data origins.
- Flexibility or phased implementation is needed to balance ambition with practicality.
- Alignment with EU PEFCR was also suggested in regards to this proposal

# Dual method reporting: ASC response

## Consultation feedback

1. Some preference to use only economic allocation and align with EU PEFCR.
2. Request for training and clear guidance on Scope 3 emissions reporting, more transparency on methodology and data origins, especially from raw material suppliers and across regional/sub-national levels.
3. Request for flexibility or initial exemptions on Scope 3 emissions requirements.



## ASC response

1. Allow public disclosure of GHG data to follow either allocation method at the discretion of the producer. Direct feed mills without scope 3 calculation systems to the ASC GHG Calculator.
2. Continue to require both methods for data reporting to ASC and data-sharing with farms to ensure transparency and consistency in GHG data.
3. Training materials are currently in development and guidance can be updated to provide further explanation for Scope 3 calculations.

**Topic three:**

**ASC greenhouse gas  
emissions calculator**



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# ASC greenhouse gas emissions calculator

Feed mills can use the ASC GHG calculator to facilitate calculations in line with ASC requirements.

- ✓ Consultation participants could view [this demonstration video](#)
- ✓ Supports feed suppliers and producers with custom-made tools to help measure and track emissions
- ✓ Ensures consistency with methodological requirements of the ASC Farm Standard
- ✓ Improves quality of GHG data reported to ASC
- ✓ Includes Scope 1, Scope 2, and Scope 3 emissions
- ✓ Helps identify key hot spots and drivers in emissions in aquaculture supply chains

The screenshot displays the ASC GHG calculator interface, which is divided into three main sections for data entry and a results summary.

- 1 Feed information:** Includes fields for Year (2022), Country (United Kingdom), Site information (ASC Feed Mill), and Species and production (Salmon - Feed).
- 2 Annual feed production on-site:** Includes a field for Year (2022) and a value of 100 tonnes.
- 3 Fuel inputs for milling:** Includes checkboxes for Diesel (checked), Petrol (unchecked), and Natural gas (checked). Below these are input fields for Natural gas (2000.00 m<sup>3</sup>) and Diesel (2000.00 L).

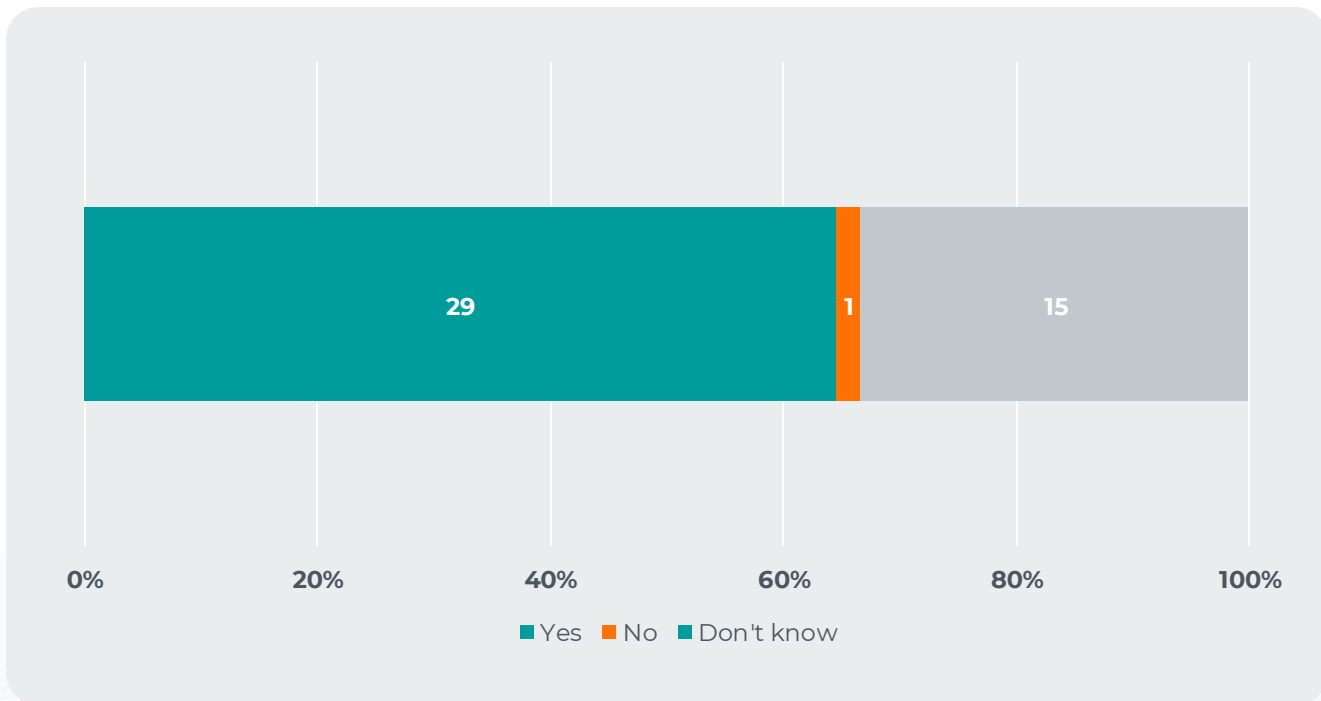
The **RESULTS** section on the right shows:

- Mass GHG emissions: **2562.8** kg CO<sub>2</sub>e per tonne.
- Filters: By input, By scope, By category.
- A donut chart showing the breakdown of emissions by category: Reduction fisheries, Soy inputs, Crop inputs, Other inputs, Electricity, Transportation, and Energy carriers.
- A button to **View GHG emission summary**.

# ASC greenhouse gas emissions calculator: helpfulness

All stakeholders were asked whether the ASC GHG emissions calculator tool would be helpful in implementing the above GHG calculation and reporting requirements.

**67% said yes:**



# ASC greenhouse gas emissions calculator: summary of comments

## Positive

- The tool is seen by feed mills and NGOs as straightforward and user friendly for measuring emissions
- One NGO requested for it to be more widely accessible for companies across the supply chain and not just mills going for certification.

## Suggested improvements

- An NGO and a primary processor called for citing and disclosing methodologies, data sources, verification methods, and emissions factors to enhance transparency and address data verification concerns.

## Further comments

- An NGO and a primary processor suggested expanding tool functionality to link farm footprints, addressing identified gaps, and ensuring alignment with IDH's environmental footprint tool, SBTi, and CSRD reporting.
- Greater flexibility and availability of more detailed data was also suggested.

# ASC greenhouse gas emissions calculator: ASC response

## Consultation Feedback

1. The tool was welcomed by stakeholders, with some wanting to see greater availability of the tool and transparency on data sources.



## ASC response

1. Encourage feed mills to use the ASC GHG Calculator.
2. Develop further materials for training and communication, including transparency on methods and data sources.
3. Explore additional options for third-party review, publishing of methods and applications, and adding additional data or allowing more custom data.

**Topic four:**

**Deforestation/conversion  
cut-off date**



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# Deforestation/conversion cut-off date

**Stakeholders were asked to give feedback on the proposal to amend the deforestation/conversion cut-off date for all plant ingredients to 31st December 2020.**

## What we are changing and why

- The Feed Standard v1.01 currently prohibits sourcing plant ingredients from suppliers involved in deforestation or land conversion after June 2021, requiring feed mills to set targets to phase out such sourcing if necessary.
- To align with the EU Deforestation Regulation, global goals like the UN's Target 15.2, and the Accountability Framework initiative, ASC plans to update the cut-off date to 31st December 2020 to prevent further deforestation ahead of future restrictions.

## Overview of stakeholder feedback

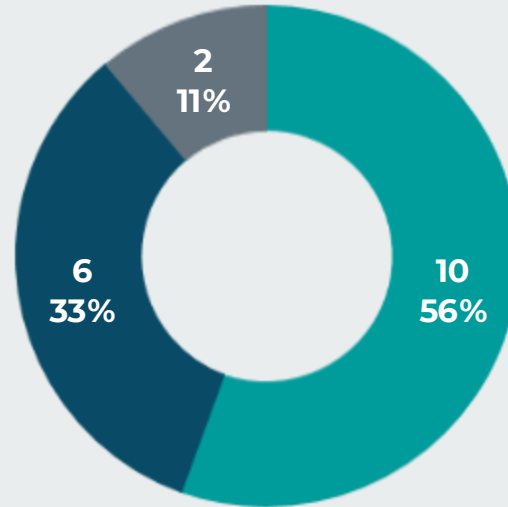
- Environmental NGOs welcomed the expanded deforestation-free scope and the enhancement of compliance claims that it brings.
- However, the 2020 cut-off is seen as unworkable for non-soy supply chains, prompting calls for regional flexibility, delayed deadlines, and exemptions for low-risk regions. Suggestions include supporting small farmers and adopting AFI's 'minimal level' concept to clarify land conversion criteria.

# Deforestation/conversion cut-off date: current obligations

Feed mills were asked whether their company is legally obliged to comply with the EU Deforestation Regulation.

**56%** said they are:

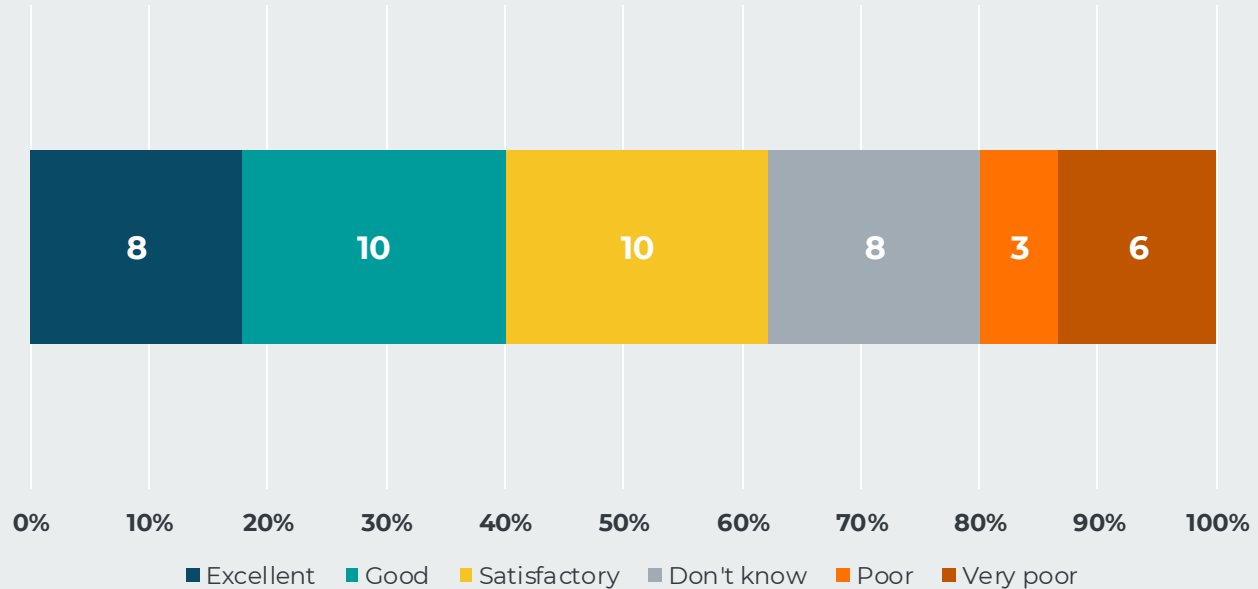
■ Yes ■ No ■ Don't know/Not Applicable



# Deforestation/conversion cut-off date: proposal rating

All stakeholders were asked to rate this amendment to the cut-off date for ease of implementation.

Over half gave a rating of satisfactory or higher:



# Deforestation/conversion cut-off date: summary of comments

## Positive

- Environmental NGOs welcomed that the new requirements expand the scope of deforestation-free efforts, reduce deforestation, and enhance the integrity of compliance claims.

## Suggested improvements

- Some proposed regional flexibility to ease compliance pressures for South American and Asian raw materials that may not meet the standards.
- Small farmers in these regions may struggle to provide traceability data.
- One stakeholder suggested delaying the cut-off date to December 2022 to mitigate impacts on livelihoods and infrastructure in less adaptable regions.

## Further comments

- A feed mill proposed to exempt low-risk regions with existing zero deforestation laws to avoid redundant requirements.
- There is concern about the EU law being potentially postponed to January 2026 and its implications for audits in 2025/26
- An NGO suggested to include AFI's 'minimal level' concept in definitions to recognise minimal, non-material conversions, clarify legal land conversion criteria, and avoid unnecessary exclusions.

# Deforestation/conversion cut-off date: ASC response

## Consultation Suggested improvements

1. Revised cut-off date to 2020/EUDR alignment quoted as not being workable for non-soy supply chains.



## ASC response

1. The proposed cut-off date will be maintained for high-risk ingredients (soy, palm oil).
2. Other plant ingredients will have alternative cut-off dates subject to requirements.

# Thank you to our stakeholders who participated in the consultation and helped improve the ASC Feed Standard.



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**Aquaculture Stewardship Council  
Daalseplein 101, 3511 SX, Utrecht, Netherlands  
Tel: +31 30 230 5929**

**[www.asc-aqua.org](http://www.asc-aqua.org)  
[communication@asc-aqua.org](mailto:communication@asc-aqua.org)  
Aquaculture Stewardship Council, 2016**

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