

CHANGE

ASC Species Scope Extension: Atlantic cod

2025 consultation summary report and ASC response



**Setting The
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Seafood**

Consultation overview

There is increasing demand for ASC certification of Atlantic cod from both farmers and retailers.

- By certifying Atlantic cod, ASC can drive improvements in farming practices, support environmental responsibility and promote fair working conditions in this sector of aquaculture.
- Most ASC Salmon Standard v1.4 criteria are also relevant to cod. Atlantic cod is a logical addition to the ASC Certification Programme because of the strong similarities with salmon farming in Norway.
- Key issues addressed through the ASC Certification Programme include biodiversity loss, ecosystem impacts, the spread of disease and resource sustainability.
- **ASC is proposing firstly to adapt the ASC Salmon Standard v1.4 to include Atlantic cod (*Gadus morhua*) and then ultimately to integrate the species into the ASC Farm Standard v1.1.**



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Consultation overview

ASC consulted stakeholders on the addition of Atlantic cod into the ASC Certification Programme.

Specifically, ASC sought stakeholder input on:

1. The project objectives, justification, scope, engagement plan and timeline
2. Impacts of Atlantic cod production
3. The applicability of ASC Salmon Standard V.1.4 to Atlantic cod
4. Relevant species-specific metrics and indicators, including new proposed FFDR values for Atlantic cod



Consultation overview

The consultation survey ran for 30 days from 20 May – 20 June 2025.

We received 34 responses to our survey, including from seven Atlantic cod producers.

Stakeholders were asked for both quantitative and open text responses on the consultation topics.

Atlantic cod will now be added to the ASC Programme in October this year.

Overview of feedback

- Stakeholders broadly supported the proposals for extending the scope of the Salmon Standard V.1.4 to include Atlantic cod.
- Challenges were noted in meeting the FFDRm <1.7 metric, and in relation to the prohibition of fishmeal from the same species or family
- Requests included extending some salmon variance requests (VRs) to cod and allowing an exception for same-family feed ingredients.
- Stakeholders emphasised the importance of recognising cod's unique characteristics in standard requirements over time, while acknowledging the need to offer cod certification in the ASC Programme now due to its potential as a growing aquaculture species.

Overview of ASC actions following consultation

- ✓ Adjusted FFDRm threshold from the proposed <1.7 to 2.3, falling to 2.1 after four years.
- ✓ Exempt cod from Indicator 3.1.1 (area-based management)
- ✓ Align fishmeal requirements with ASC Farm Standard ensuring no Atlantic cod included in diets but inclusion of blue whiting permitted
- ✓ Extend current salmon VRs (980 and 799) to Atlantic cod



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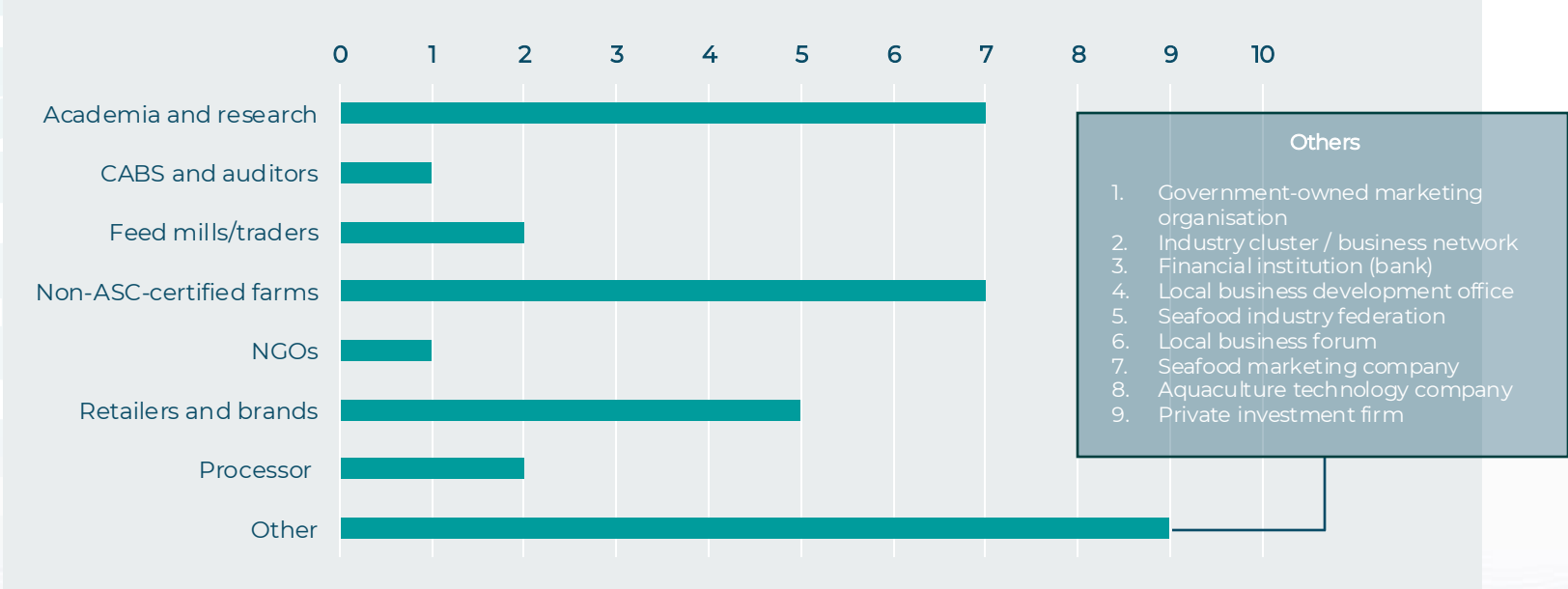
Stakeholder participation



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Participation: stakeholder type

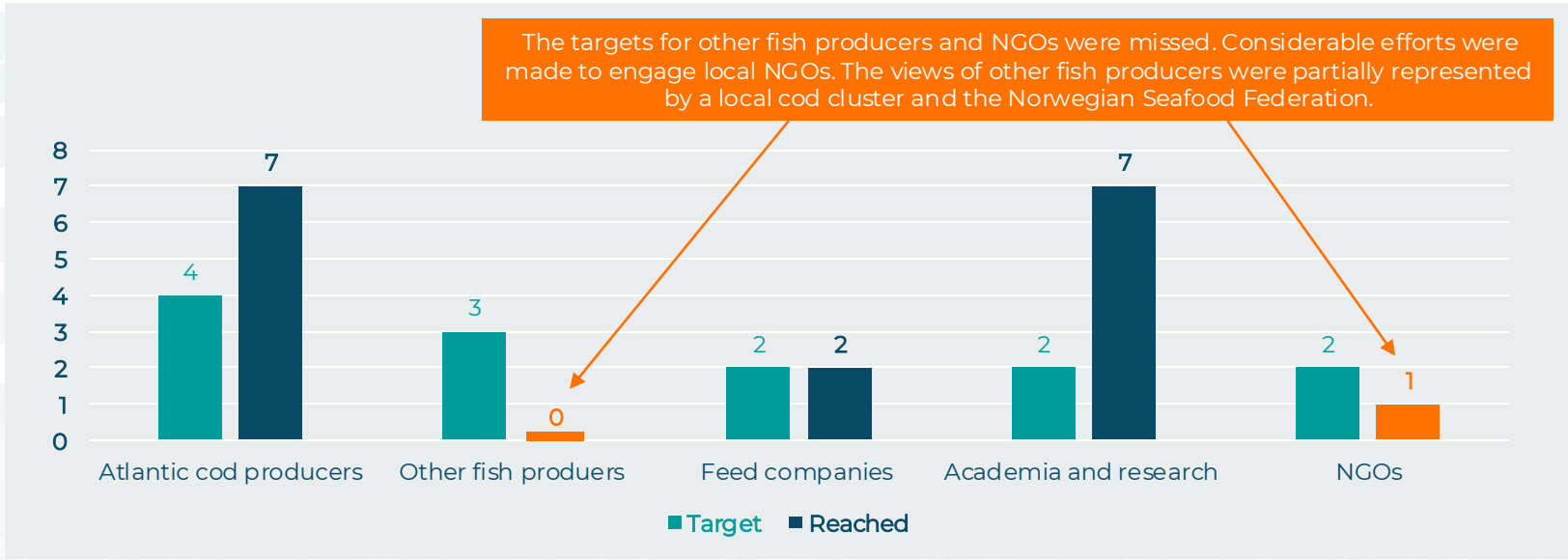
We received 34 responses to our survey, from the following stakeholder types:



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Progress against feedback targets per stakeholder groups

We met our feedback targets for Atlantic cod producers, feed companies, academia and research bodies, but not for other fish producers and NGOs.



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Participation: country

The vast majority of respondents were from Norway, where the consultation was targeted

Top participating countries

1. Norway:
21 responses
2. UK and France:
2 responses
3. All other countries:
1 response



Section one:

Applicability of ASC Salmon Standard and project Terms of Reference

What ASC proposed to stakeholders:

- Include Atlantic cod in the certification programme, as its farming shares many similarities with salmon
- Address cod farming initially through a modified ASC Salmon Standard to enable immediate certification access.
- Add Atlantic cod to the ASC Farm Standard V1.1 following the two year transition period, allowing cod farmers sufficient time to adapt to the new requirements

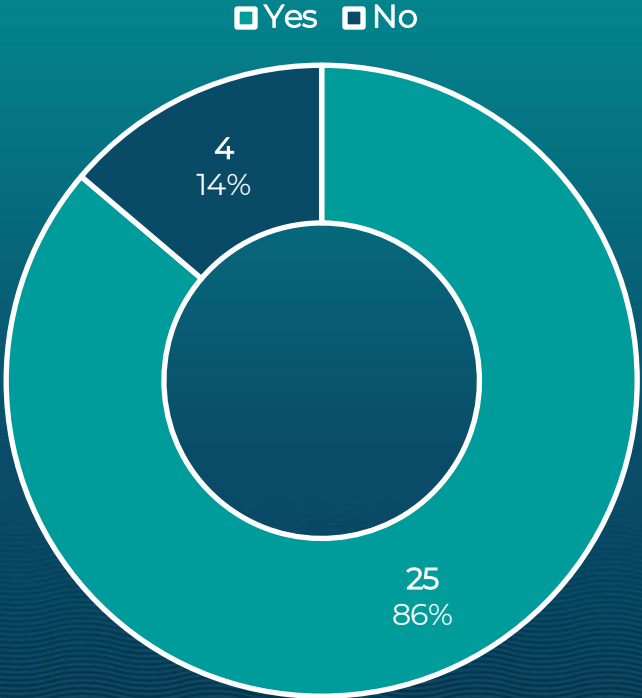


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Applicability of ASC Salmon Standard: acceptance

Participants were asked whether the ASC Salmon Standard can adequately address the environmental and social impacts of Atlantic cod farming.

86% said yes



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Applicability of ASC Salmon Standard: summary of comments

Positive

- Strong support for including cod in the ASC Salmon Standard to boost market access and industry reputation.
- Benefits of integration outweigh species differences, promoting sustainability and sector growth.
- Certification seen as key to responsible, long-term development.

Suggested improvements

- Some academia and retail stakeholders argued cod and salmon farming differ significantly, asking for a separate standard.
- Concerns included cod-specific health, welfare, and biosecurity risks not fully addressed by the Salmon Standard.
- Early spawning and escape risks raise environmental and genetic concerns unique to cod.

Further comments

- A producer highlighted concerns about the short timeline for transitioning cod from the Salmon Standard to the new Farm Standard.
- They warned that cod producers may struggle to adapt to two changing sets of requirements quickly.

Applicability of ASC Salmon Standard: ASC response

Consultation feedback

1. Some stakeholders wanted ASC to address cod's unique health, welfare, and environmental risks through a separate standard.

2. Others requested a realistic and well-communicated timeline for transitioning cod into the ASC Farm Standard, allowing producers time to adapt.



ASC response

1. ASC considers cod and salmon farming in Norway sufficiently similar to combine cod into the existing ASC Salmon Standard, with cod specific indicators, rather than through the creation of a separate standard.

2. Atlantic cod will share the same transition timeline to the ASC Farm Standard as other species.

Section two: FFDR metrics

What ASC proposed to stakeholders:

- Introduce distinct FFDR values for Atlantic cod due to differences in feed efficiency and dietary inclusion of fish meal and fish oil compared to salmon.
- The following FFDR metrics, based on the ASC Metrics Methodology:
 - FFDR_m <1.7
 - FFDR_o <1

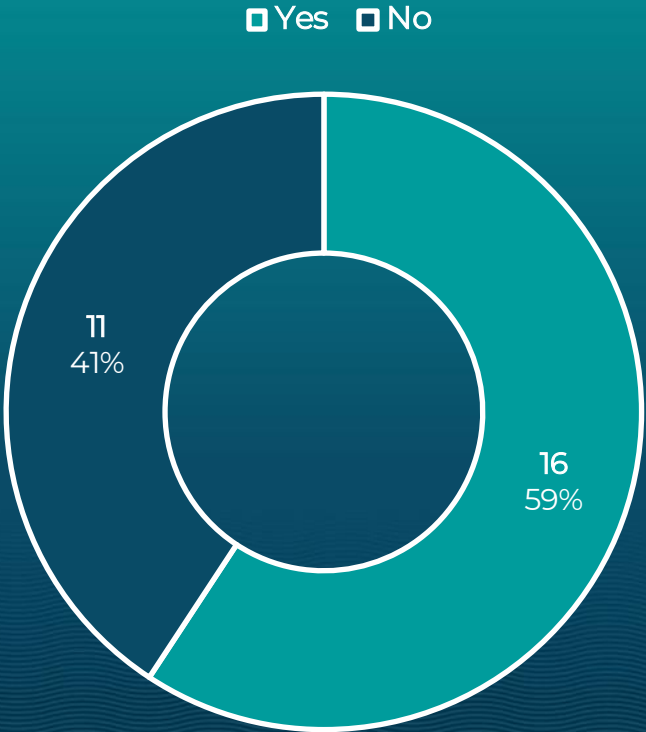


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FFDR metrics: acceptance

Participants were asked whether they agree with the proposed species-specific FFDR values for Atlantic cod.

59% said yes



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FFDR metrics: summary of comments

Positive

- NGOs, academia, research, and retailers generally supported FFDR values as important for sustainable feed sourcing and aligned with responsible aquaculture goals.
- Some caution raised about setting FFDR_m at 1.7, as it may limit feed formulation flexibility and affect cod performance

Suggested improvements

- Broad concern from producers that the proposed FFDR_m value is too ambitious. Many producers and feed traders recommended a FFDR_m between <2.1 and <2.5, supported by feed trials showing current fishmeal levels of 50–75% are needed for good growth and health.
- The proposed FFDR_o value of <1 was mostly accepted, though some producers and CABs questioned if it is too low.

Further comments

- Some stakeholders from academia questioned cod's inclusion in the Salmon Standard due to high fishmeal use and limited alternative proteins.
- They urged a broader sustainability focus that considers feed's impact on human food resources and social equity.
- One respondent noted that the FFDR_o for salmonids might need review.

FFDR metrics: ASC response

Consultation feedback

1. Stakeholders see <1.7 as too ambitious at this stage; and ask for a more realistic FFDRm of <2.1–2.5

2. FFDRo of <1 is mostly accepted but some stakeholders want ASC to increase this value.



ASC response

The FFDRm will be raised from 1.7 to 2.3 initially, decreasing to 2.1 four years after publication of the ASC Salmon and Cod Standard. This approach recognizes the early stage of maturity of the cod farming industry, while setting it on a pathway to improvement.

1.

ASC will keep the FFDRo at <1, based on the broad support received during the consultation.

2.

Section three:

Criterion 3.1: Introduced or amplified parasites and pathogens

What ASC proposed to stakeholders:

- o Sea lice indicators are not applicable to cod. Atlantic cod are primarily impacted by *Caligus curtus* (cod lice), whereas salmon are affected by *Lepeophtheirus salmonis* (sea lice), with distinct impacts.
- o Only indicators 3.1.1 (participation in Area-Based-Management (ABM) scheme) and 3.1.3 (commitment to collaborate on research to measure impacts on wild stocks) from Criterion 3.1 be retained for cod.

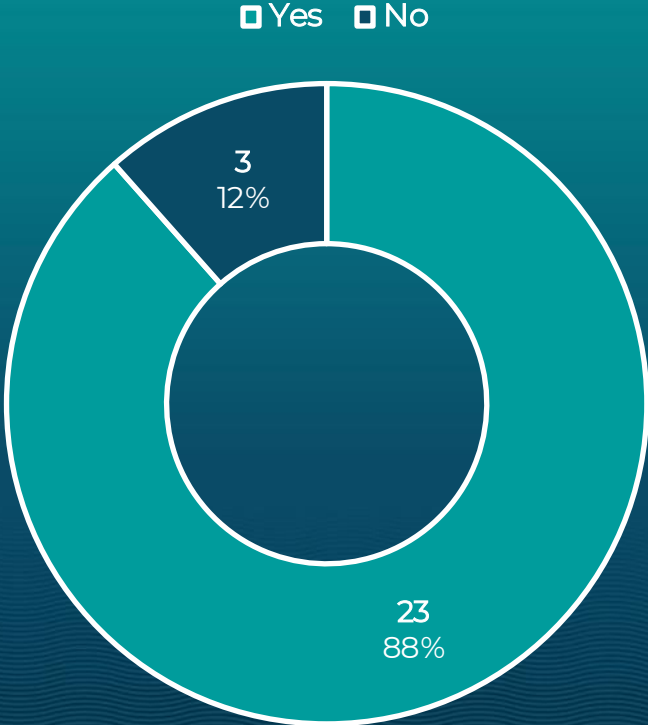


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Criterion 3.1: acceptance

Participants were asked whether they agree with the proposal to retain only indicators 3.1.1 and 3.1.3 from Criterion 3.1 for Atlantic cod.

88% said yes



Criterion 3.1: summary of comments

Positive

- Most stakeholders agreed with the proposal on Criterion 3.1 for cod farming.

Suggested improvements

- Producers expressed concerns that implementing ABM systems may be impractical for cod due to small, dispersed farms that don't operate close together.
- Stakeholders noted lice aren't a concern in closed cod systems and recommended adding instead Indicator 3.1.4 to manage breeding grounds near farms, addressing early spawning risks.

Further comments

- One stakeholder from academia pointed out that Atlantic cod hosts a range of both external and internal parasites, with the potential for interaction between farmed and wild populations.
- They felt that the proposed approach did not fully address this risk.

Criterion 3.1: ASC response

Consultation feedback

1. Indicator 3.1.1: Stakeholders suggested accepting national-level collaboration platforms like Cod Cluster as a practical alternative to ABM systems in the Salmon Standard.

2. It was requested to address the potential for interaction between farmed and wild populations rather than these proposed indicators.

ASC response

1. ASC agrees this indicator is not applicable to cod and will be excluded. ASC will monitor developments and may revise this requirement in the future.

2. Indicator 3.1.3 (collaboration with NGOs, academics, and governments on measuring impacts on wild fish stocks) will address the risk of assessing interactions between farmed and wild populations. The outcome of this research will inform future EICAT assessments of the species in the Farm Standard.

Section four:

Section 8: Requirements for suppliers of smolt

What ASC proposed to stakeholders:

- In the 'Requirements for suppliers of smolt' section, all indicators apply to Atlantic cod except 8.4 and 8.24–8.28.
- Indicator 8.4 addresses effluent discharge into freshwater, which is not relevant for cod due to its fully marine lifecycle.
- Indicators 8.24–8.28 are not relevant, as they apply only to systems discharging into freshwater.

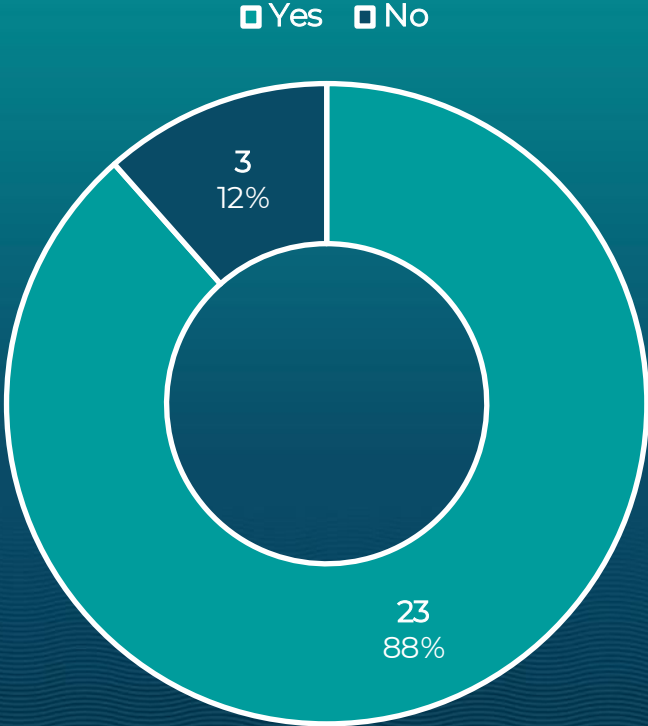


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Section 8 requirements: acceptance

Participants were asked whether the section 8 requirements of the ASC Salmon Standard address the impacts of smolt and fingerlings suppliers to Atlantic cod producers

88% said yes



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Section 8 requirements: summary of comments

Positive

- Most stakeholders agree with the fact that section 8 requirements adequately address the specific impacts of suppliers in relation to Atlantic cod.

Suggested improvements

- Some academia and research stakeholders were concerned that the proposed adjustments may not fully reflect the specific characteristics of Atlantic cod production.
- It was noted that cod fingerling suppliers differ in significant ways.
- Unlike salmon, cod spend their entire lifecycle in marine environments, which may require further adaptations to address supplier-related risks and impacts.



Section 8: ASC response

Consultation feedback

Stakeholders asked ASC to further adapt Section 8 to better reflect the unique characteristics of Atlantic cod production, accounting for the variability in cod fingerling suppliers' biosecurity and health practices, as well as cod's fully marine lifecycle, to ensure supplier-related risks and impacts are adequately addressed.



ASC response

ASC acknowledges this feedback. We believe, however, that the current Section 8 requirements sufficiently address the key characteristics and challenges of Atlantic cod production. The Standard provides a solid overview of the most pressing impacts, and it is designed to manage these risks effectively without the need for further modifications at this time.



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Section five:

Stakeholder proposals for Indicator Changes

What ASC proposed to stakeholders:

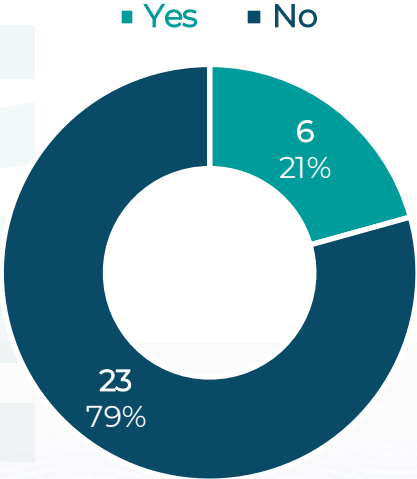
- For Atlantic cod to be added to the Scope of the ASC Salmon Standard
- No changes to Principle 1 (Laws and regulations), Principle 2 (Habitat, biodiversity and ecosystem function), Principle 6 (Social responsibility) and Principle 7 (Be a good neighbour)
- Removal of some indicators from criterion 3.1, 5.2 and section 8 for Atlantic cod
- Addition of FFDR values for Atlantic cod



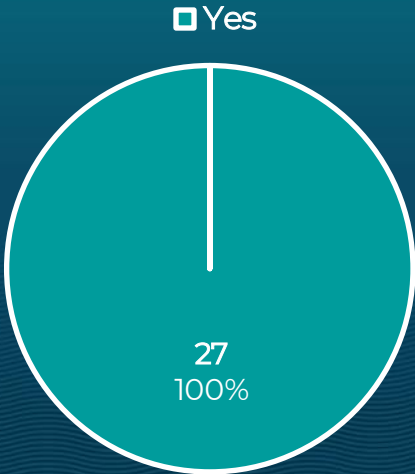
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Additional indicators and exclusions

Are there any additional indicators you believe should be added to more accurately assess Atlantic cod farming?



Do you agree that the proposed excluded indicators are not relevant to Atlantic cod production?



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Stakeholder Proposals for Indicator Changes

Positive

- Most stakeholders agreed that there is no immediate need to add additional indicators to more accurately assess Atlantic cod farming within the Salmon Standard.
- Most stakeholders agree that the proposed excluded indicators are not relevant to Atlantic cod production.

Suggested improvements

- Health and welfare (e.g., mortality tracking, deformity prevention, cod-specific welfare standards)
- Biosecurity and disease control (e.g., immunization, fallowing, parasite surveillance)
- Environmental and site management (e.g., site selection, water quality, net maintenance)
- Genetic and reproductive control (e.g., monitoring and preventing early spawning)

Further comments

- Fines thresholds
- Requirement for community meetings
- Norway's incomplete environmental classification and monitoring systems
- Cost-effectiveness of site-specific AZE modelling
- Challenges with the prohibition of fishmeal from the same species/family.

Variance requests (VRs)

Consultation feedback

1. One producer requested that the salmon VRs Q&A for Norwegian salmon to be made directly applicable to cod.
2. Indicator 7.1.1, footnote 144 + Indicator 8.20: One producer noted that biannual in-person meetings are impractical in remote Norway and suggested allowing one yearly meeting plus digital engagement (as per VR 225).
3. Indicator 2.3.1: One producer noted cod feed is drier/rougher than salmon feed, leading to more fines, and suggested a <1.5% threshold.



ASC response

1. ASC is reviewing current VRs to decide which should move to the Farm Standard, and will assess their relevance to cod as part of this process.
2. ASC will extend the scope of VR 980 to cod.
3. ASC will keep the <1% fines limit and extend VR 799 to cod. The Farm Standard will include the content of this VR.

Indicator 2.1.4 – Site-Specific AZE Modelling

Consultation Suggested improvements

One producer requested that the salmon VRs Q&A for One respondent questioned the relevance and cost-efficiency of requiring site-specific Allowable Zone of Effects (AZE) modelling for cod farms, especially during a transitional phase, as AZE is not part of the ASC Farm Standard and that the costly would likely be used for only one production cycle. A more flexible approach, such as accepting tentative modelling by accredited third-party consultants, was recommended



ASC response

In salmon audits, NS 9410:2016 is accepted as evidence of conformance for indicator 2.1.4, and the same applies to cod.

This Norwegian regulation requires a pre-survey to define local and intermediate impact zones before establishing or expanding a farm.

Indicator 4.3.4 – Prohibition of Fishmeal from the same species or family

Consultation Suggested improvements

Stakeholders flagged significant challenges with this requirement for cod farming. Since cod belongs to the Gadidae family, which includes many other commercially fished species (like blue whiting), this rule would make it difficult for feed manufacturers to produce compliant feeds, as the feed itself includes members of the Gadidae family and sometimes cod itself. They suggested aligning the standard with existing EU regulations, which prohibit using farmed fishmeal in feeds for the same species but allow wild-caught fish to be used.



ASC response

Add Indicator 2.12.3 of the ASC Farm Standard. This indicator will ensure that the main species currently used in feed remains unaffected by the requirement, while use of wild caught cod is not permitted.

Additional comments

Consultation Suggested improvements

1. One academic highlighted that data gaps in Norway's water classification system (used for EU compliance) make it hard for salmon and cod farms to meet requirements. Environmental monitoring was also seen as challenging and unclear.

2. Stakeholders from various sectors called for cod-specific indicators on welfare (e.g. deformities, gut issues), biosecurity (e.g. immunization, fallowing), environment (e.g. site, water quality), and genetics (e.g. early spawning).



ASC response

1. A benchmarking project is underway comparing Norwegian regulations for water quality with ASC requirements; results will also apply to cod. A draft is under internal review, with stakeholder feedback planned for September and finalisation in October 2025.

2. Cod and salmon farming in Norway are considered similar enough for cod to be included under the current ASC Salmon Standard initially, with cod-specific issues to be addressed through the Farm Standard and its future revisions. Several suggested indicators on environment, health, welfare, and disease control are already covered, and future versions may consider reproductive control.



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**Thank you to our
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