COMMENTS SUBMISSION FORM

(All fields must be filled in to be completed. Only completed forms are processed. Please send comments to: standards@asc-aqua.org)

A. Information of the commentator

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Phone/ Mobile:

B. Detail of the comment

I would like to comment on:

☐ The ASC **TOR** for:

☐ The following ASC **standard** (*Please only tick one standard per each form*):

☒ Core ☐ Bivalve ☐ Seriola-Cobia ☐ Tilapia

☐ Abalone ☐ Freshwater trout ☐ Shrimp ☐ Other (*specify*)

Section No.	Page	Comment	Rationale (e.g. reference to scientific articles, industry practices)	Proposed change (reword the section as precisely as possible)
–	–	The Salmon Standard 'Indicators and Requirements for Smolt Production (Section 8: Requirements for Suppliers of Smolt)' and the Trout Standard 'Requirements for Fingerling and Egg Suppliers' are not included in the draft Core Standard.	To keep the indicators and requirements created by the Dialogues.	Include all smolt production (salmon and trout) indicators in the core standard.

2.1.3	11	SeaChoice supports the core standard including indicator 2.1.3 'The ecological carrying capacity of the waterbody is not exceeded'. However, we believe this needs to be expanded given a) 'carrying capacity' and cumulative/area-based impacts are not currently addressed by the Salmon Standard and that b) the ASC is working towards multi-site and group certification schemes. Therefore, we strongly urge the ASC to develop an Area-based Management (ABM) standard / set of indicators.	The ASC standards were created to be farm-site specific and do not adequately address cumulative impacts (e.g. carrying capacity of a waterbody).	It is recommended ASC develop an ABM Standard and incorporate this into the core standard.
2.5.3	15	Indicator 2.5.3 'Lethal incidents are publicly available and limited' is listed under the "Key" excel file as incorporating salmon standard indicators 2.5.5; 2.5.6 and 2.5.7. We however disagree that 2.5.6 'Maximum number of lethal incidents on the farm over the prior two years' is adequately addressed by the draft indicator 2.5.3 as a 'maximum' condition is not included in the text descriptor.	To keep the indicator and requirement created by the Dialogues.	Add the following indicator to the core standard under 2.5 Criterion Interaction with wildlife: Maximum number of lethal incidents on the farm over the prior two years Requirement: < 9 lethal incidents [36], with no more than two of the incidents being marine mammals OR at the very least incorporates "… and do not exceed maximum allowable amounts" and then refers to the species specific appendix for the requirement (E.g. < 9 lethal incidents [36], with no more than two of the incidents being marine mammals for the salmon standard). This would be aligned with how 3.3.5 is worded.

3.2	16	There can be significant biodiversity concerns associated with the culture of “native” species. Wild salmon populations differ genetically from farmed and there are a number of studies that have demonstrated farmed Atlantic salmon cause significant concerns and risks on these populations. Criterion 3.3 Prevention of Escapes (Page 17) of the draft Core standard recognizes this by stating: “Escaped farmed species… alter the overall pool of genetic diversity through competition with wild fish and interbreeding with local wild stocks of the same population. Genetic diversity is an important conservation issue, as escaped farmed species have the potential to negatively impact the genetic diversity of wild species by interbreeding”. The ASC therefore recognizes this concern, however has failed to incorporate it as an establishment risk. Hence, we find the interpretation of “native” vs. “non-native” (or “exotic species”) under Criterion 3.2 to be flawed. We propose that farmed Atlantic salmon should be deemed “non-native” in areas where wild Atlantic salmon are located due to their genetic differences or that the standard should incorporate the impacts/risks of “native” species into the criterion. For example, ASC certified salmon farms located in the Atlantic have been exempt from the Salmon Standard Indicator 3.2.2 If a non-native species is being produced, evidence of scientific research completed within the past five years that investigates the risk of establishment of the species within the farm’s jurisdiction and these results submitted to ASC for review. Yet many studies have shown farmed Atlantic salmon establishment in the Atlantic (e.g. Canada) as a significant threat to wild salmon populations and genetics. All aquaculture facilities should demonstrate that their species (native or not) are not having an impact on wild population	Wild populations differ genetically from farmed Atlantic salmon. Compared to wild salmon populations, it is recognized that farmed salmon are genetically less diverse[1] [2]. Studies[3] [4] on homogenization hybrids reflect this. Therefore, we propose that farmed Atlantic salmon should be deemed “non-native”. Particularly with the significant concerns associated with the risk of establishment and gene pool degradation of at risk wild salmon populations. For example, studies on wild and escaped farmed salmon in the Magaguadavic River[5] [6] demonstrated successful inter-breeding, suggesting introgression is leading to genetic homogenization and adaptation loss, with the potential risk to North American wild salmon populations to be “high”[7]. Recent studies by Department of Fisheries and Oceans Canada (DFO) found evidence of interbreeding in 17 out of 18 Newfoundland rivers[8]. ASC incorporating this issue into their criteria would be aligned with Monterey Bay Aquarium’s Seafood Watch aquaculture methodology which includes the assessment of the “Ecological impacts of native and non-native species”. Refer to Escapes: Factor 6.2 Invasiveness[9]. (Note: see worksheet 2 "3.2 References" for referencing)	Either broaden the definition of “non-native” (“exotic species”) to include genetic differences or incorporate the ‘ecological impacts of native species’ and ‘establishment risk’ to Criterion 3.2 of the ASC Core Standard.
4.1.1	19	To ensure a high bar for health and disease management, we recommend reinstating the OIE Aquatic Animal Health Code to the indicator.	To keep the indicator and requirement created by the Dialogues.	4.1.1 The farm implements a Health Management Plan and compliance with the OIE Aquatic Animal Health Code

4.3.5	21	We find the draft indicator 'Antibiotic use is calculated' to be weak.	To keep the indicator and requirement created by the Dialogues.	4.3.6 Number of treatments of antibiotics over the most recent production cycle (and then the restricted number as per the standard. E.g. ≤3 for the salmon standard) OR at the very least incorporates "… and do not exceed maximum allowable amounts" which would then require the CAB to refer to the species specific appendix for the requirement (E.g. ≤3 for the salmon standard). This would be aligned with how 3.3.5 is worded.
4.3.9	21	In the Excel document "Key", salmon standard indicator 4.7.3 is missing. It should be located under the draft core standard indicator 4.3.9 (Excel file) and 4.3.8 as per the DRAFT Core Standard: Harmonization (PDF file)		Core standard indicator 4.3.8 should incorporate salmon standard indicator 4.7.3
Scope		We are unsure why the Excel document "Key", lists salmon standard indicator 3.3.1 Use of transgenic salmon by the farm under "Scope" and not in the draft indicators.	To keep the indicator and requirement created by the Dialogues.	Include salmon standard indicator 3.3.1 in the draft core standard.

Other open comment(s): **Include a common definition for 'Farm site'**

In the ASC Core Standard Development briefing documents, it states the Core Standard 'structure' will have: "The inclusion of common definitions and references".

SeaChoice recommends the ASC includes a common definition for 'farm site' and 'production cycle'. After reviewing a number of ASC audit assessments, it is apparent that some audit reports lack significant stages of the production cycle and the associated data. Intermediary stages— such as nursery, transfer, or early grow-out pens— have been excluded (common practices in salmon farming jurisdictions such as British Columbia, Ireland and Scotland). Consequently, only the hatchery (smolt) and final grow-out pen (typically minus harvest) are being included. This raises the concern that audits are potentially missing key environmental indicators and granting certification to farms that may be non-conforming. In addition, omitting the intermediary stage creates the potential to compromise the product's chain of custody.

By including a common definition of 'farm site' in the ASC Core Standard, it will provide clients and CABs clear guidance that all stages and locations of the full production cycle should be included in the audit assessments. It will additionally provide customers and stakeholders confidence that all stages of the production cycle have been assessed for conformance to the ASC standard.

Place, date: Hobart, 18/10/16

C. Handling of the comments (*For ASC staff members only***)**

Comment received on (date): _____ By: _____

Comment registration No. (*to be referred to in the Issue Log*):

Received via: ☐ Email: _____ Phone: _____

☐ In person (*specify the event - name, date, place*): _____