

DRAFT MULTI-SITE METHODOLOGY - REQUIREMENTS FOR MULTI-SITE ORGANISATIONS

2nd Public Consultation: **30.03 - 30.04.2017**

Please send your comments before **30.04.2017** to: standards@asc-aqua.org

Agreement

By sending this filled out comment form to ASC, we agree to have our comments published on the ASC website without personal names but of the organisation that we represent.

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Position: _____

* *Must be filled out*

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General comments that do not relate directly to the content of the following worksheets (page 1-4)

Reference (if applicable)	General comments
	<p>Multi-site Methodology is Premature</p> <p>SeaChoice cannot support the multi-site methodology. The intent of the Aquaculture Dialogues was to create a metric performance-based standard applicable only to the farm-site level. Therefore, the resulting final standards are not suited to and cannot appropriately be applied to a regional multi-site level. In addition, our review of the application of standards during the ASC's 'infancy stage' has shown concerns with report quality, audit processes, CAB performance, ASC governance and variance processes, gaps in stakeholder engagement opportunities and the need to provide further rules in the CAR on certificate suspension and revocation.</p> <p><i>SeaChoice strongly recommends the ASC complete the Monitoring and Evaluation framework and gather 2-3 years of data; complete the Core Standard Development (i.e. harmonization) as well as field test and compile 2-3 years of data; refine stakeholder engagement and evaluate effectiveness; amend the CAR deficiencies (e.g. suspension, revocation; audit processes); correct the variance process concerns; and establish an ABM standard (see below). With relevant projects, weaknesses and concerns addressed, only then consider the multi-site certification. Without addressing these prior, a multi-site certification could exacerbate concerns and threaten confidence in the standard/logo. In addition, we recommend the ASC starts precautionary with a maximum of 10 farms.</i></p>

	<p>ASC Develop an ABM Standard</p> <p>The multi-site methodology is a departure from the Aquaculture Dialogue’s intent to create farm-level performance-based metric standards. The ASC standards alone do not adequately address cumulative impacts. Establishing the multisite methodology without addressing this standard deficiency creates the potential for un-tracked and unmitigated cumulative environmental impacts that gain certification. For example: if all sites utilize parasiticides below the ASC site-level threshold but still cause an cumulative impact, all can remain certified. Likewise, once an initial audit is done, the sampling methodology proposed could allow non-conformities to happen at farms that do not receive surveillance audits yet the unit would still be causing an impact that would not be certifiable on a site by site basis.</p> <p>This issue is particularly pronounced when considering the ASC’s approved regional variances. For example, an approved Chilean varied criterion to the government regime for parasiticide use, overrides the Indicator 5.2.5 PTI requirement and allows farms to use a higher level of chemicals than what is technically allowed in the salmon standard criteria. A recent study (Tucca et al. 2016) found cypermethrin in sediment near salmon farms in Southern Chile at levels significant to pose a risk to benthic invertebrates. Burrige et al. (2010) identified bath treatments can retain toxicity for substantial periods of time and the lack of studies on cumulative effects of parasiticides (and remain so). GSI data shows Chilean sites have an average of nearly 10 parasiticide applications per site, with the majority being bath treatments. The Chilean authority allows up to three treatments per chemical family (of which four are approved currently). This high frequency sea lice treatments have made Chile vulnerable to parasiticide resistance, as demonstrated by Helgesen et al. (2014). Therefore, the multi-site methodology and the varied salmon standard criteria would allow farms to apply high levels of parasiticides causing a potentially cumulative effect on the benthic environment and further contribute to resistance concerns.</p> <p>Likewise, the ASC approved sea lice varied criteria that defers to Canadian regulations instead of indicator 3.1.7, in practice, allows for no absolute maximum on-farm sea lice abundance count. In this example, the multi-site methodology and the salmon standard varied criterion would allow multiple farms to harbour unlimited high sea lice loads causing a potentially detrimental cumulative impact on wild juvenile salmon – yet farms would be allowed to remain certified.</p> <p><i>SeaChoice strongly recommends that prior to a multi-site certification scheme, ASC develop an ABM Standard approach to address this deficiency and to ensure credibility of the standard.</i></p>
	<p>Audit Sampling</p> <p>SeaChoice supports the draft methodology’s revision of stipulating all sites will be subject to the initial audit. However, we still have two concerns:</p> <ol style="list-style-type: none"> 1. Surveillance and recertification sampling sizes still result in an unacceptable confidence level. The algorithm results in 4/50 (low risk); 8/50 (medium risk) and 29/50 (high risk).The possibility of missing a non-conformity at an unaudited farm is likely significant; and 2. Choosing sample sites. The proposed guidance allows for the possibility for CABs and their clients to cherry pick better performing sites. In addition, the draft requirements for multi-site organizations states the maximum geographic location of sites are defined as per their ‘jurisdiction’ (e.g. B.C., Chile, Norway, etc.). The draft sampling methodology does not factor in environmental performance variability within jurisdictions. More specifically that a) despite management, environmental performance between sites can vary greatly and b) environmental characteristics within jurisdictions can vary greatly (e.g. benthic, biotic factors, hydrodynamics, etc.). <p><i>Therefore, SeaChoice recommends the ASC keeps the 100% initial audit for all sites and increases the number of sample sites for surveillance and recertification audits. Consider a rule that all sites should have at least one surveillance audit during the validity of certificate. The ASC should establish rules that ensure sample sites are chosen at random, and unannounced. A requirement to represent environmental performance and geographical diversity should be added, or preferably any sites that have environmental characteristics that are substantively different should not be allowed in a multi-site certificate. ASC should set a standard confidence level and confidence interval for its sampling and auditing protocols. Recommended at 95% confidence level, or confidence interval of +/- 5.</i></p>

	<p>Initial audit timing and full cycle of data for evidence of compliance</p> <p>The draft methodology allows for the initial audit (and certification) of sites not currently in production and does not stipulate any parameters on age of data for these sites. It raises the question of how a farm that has been inactive (particularly for a longer period) could successfully provide the required evidence of compliance to the standard. Would the methodology be reliant on archived production cycle data? If so, we submit standard indicators that rely on current production cycle data would not be sufficiently met.</p> <p>In addition, for sites that are in production, early auditing is currently common practice on review of ASC audit reports. There is evidence to suggest early auditing has enabled non-conforming product to enter the market with the ASC certification on at least one occasion. The multi-site methodology, by definition, allows for the increased probability of non-conforming product to enter the market with the logo.</p> <p>Simply put, early audits prevent an analysis of the entire production cycle, providing the auditor with no data at all with which to evaluate compliance with a number of the salmon standard's indicators. This practice appears to contravene a clear requirement set out in the CAR: "Audits shall not be conducted until sufficient records/evidence are available for all applicable standard requirements as the minimum". An entire production cycle must be completed to have 'sufficient records and evidence' to confirm conformance with all applicable salmon standard indicators. For example, the benthic monitoring indicators set out in Criterion 2 can only be addressed by sampling conducted at the farm's peak biomass (i.e. harvest). Several indicators rely on similar end-of-cycle calculations, such as the Estimated Unexplained Loss (3.4.3); Maximum viral disease-related mortality (5.1.5); Maximum unexplained mortality rate (5.1.6); Maximum farm level cumulative parasiticide treatment index score (5.2.5); Number of treatments of antibiotics (5.2.9) and Fishmeal/Fish Oil Forage Fish Dependency Ratio (4.2.1/4.2.2). Numerous indicators focus on whether an event occurs beyond a stipulated threshold during a stated period up to and including the production cycle under audit, such as Maximum number of lethal incidents (2.5.6); Maximum on-farm lice levels (3.1.7); Maximum number of escapes (3.4.1) and OIE-notifiable disease occurrence (5.4.4).</p> <p>Finally, it appears to contravene the upcoming revised salmon standard's requirement of audits to be conducted when farms are >75% peak biomass for benthic monitoring.</p> <p><i>SeaChoice recommends sites not in production should not be included in the Unit of Certification. Revise the CAR to stipulate the earliest an audit can occur is >75% peak biomass (as required by the revised salmon standard benthic indicators). Likewise, broaden the requirement to raise a minor non-conformity to include all indicators that rely on a full production cycle of data. Closure of these non-conformities should occur before certification awarded. This is consistent with the stipulation that farms must fulfil 100% of the standard's requirements in order to be certified. This should be regardless of the Unit of Certification's scope (i.e. an individual site or part of a multi-site).</i></p>
	<p>Non-Conformities</p> <p>The multi-site methodology fails to provide guidance and rules to CABs about non-conformities in the context of multi-sites. Firstly, it should be noted the CAR does not provide guidance for when a CAB should raise a major non-conformity arising from events occurring during the validity of a certificate (regardless if it is an individual or multi-site certificate). On review of ASC audit reports, major non-compliance identified during a valid certificate is typically raised at the surveillance audit – even when facts were made public earlier than the scheduled surveillance. Without a rule within the CAR that stipulates when a CAB should raise a known major NC, combined with the limited sample sites for surveillance audits, there is an obvious risk that a farm will continue to operate in non-conformity but with its certificate still in place for an indefinite period of time – what if the farm with the Major NC is not included in the sample surveillance audit? Leaving the onus on the CAB as to when to raise the non-conformity, allows for ambiguity and subjectivity particularly when every site is not subject to a surveillance audit.</p> <p><i>SeaChoice recommends ASC modify the CAR to require major non-conformities identified during the validity of a certificate to be raised immediately upon identification and, if still open at time of harvest, stipulate that the ASC label should not be used. In addition, for the multi-site methodology, ensure the farm in question that experienced the major non-conformity is part of or in addition to the sample sites for surveillance. As all sites including non-audited, will need to continue to submit metric data to ASC, if this data indicates a major NC – the ASC should require the CAB to act immediately.</i></p>

	<p>Unit of Certification: Deletion of shared watershed or receiving waterbody</p> <p>All reference to farms in the UoC being in the same receiving waterbody/watershed appear to have been removed and the multisite criteria defaulted to the same "management system" and "similar" jurisdictional rules. Regulations are the bare minimum entry point to ASC certification as in Principle 1; they do not represent compliance with the standard and should not be given the weight of supporting multisite qualification. In the extreme, it could be argued that Cooke in NB, Canada and Maine, USA could be part of a multi-site UoC. This is not sufficient oversight and differentiation for a certification predicated on site-specific performance. Similarly, Marine Harvest farms in in BC, Canada and Washington, USA might argue they face essentially similar jurisdictions but an involved stakeholder might make a very different assessment (if they had the opportunity to challenge the sites to be included in the UoC? - see below). While there may be some difficulty with technically describing a "share a watershed or receiving waterbody" it is not insurmountable and several easy examples come to mind (e.g. bay, fjord, river delta, etc.). Regardless of technical difficulty we submit it is not acceptable to remove this because the ASC is based on actual impact to the environment and dissociating the UoC from the environment completely undermines that basis.</p> <p><i>SeaChoice strongly recommends reinstating the requirement for all farms in the UoC to share a watershed or receiving waterbody.</i></p>
	<p>Stakeholder Engagement</p> <p>Defining the scope of the Unit of Certification (see our comments above) is an integral process of the multi-site scheme that should include involve stakeholders.</p> <p><i>SeaChoice recommends stakeholders should at the very least be able to challenge a UoC procedure. How will stakeholder complaints and non-conformance submissions be adequately addressed given the lack of NC rules and the surveillance audit sampling size (see our comments above). In addition, the stakeholder period for comments should be extended to reflect the scope of the audit load.</i></p>