

August 23, 2015

Attn: ThanhVan Cao  
Senior Standards and Certification Coordinator  
Aquaculture Stewardship Council  
ThanhVan.Cao@asc-aqua.org

Re: Public Consultation for ASC's Certification and Accreditation Requirements

We the undersigned are pleased to be submitting comments to the public consultation period for ASC's Certification and Accreditation Requirements (CAR). Our organizations and programs have been active players in the sustainable seafood movement for more than a decade advocating for fisheries and aquaculture reform through market-based incentives. We have partnered with some of the largest retailers, food service providers and seafood suppliers in Canada and the U.S.; working with them to transition their seafood procurement to more sustainable sources. Recognizing that the ASC continues to play an important and growing role as a prominent eco-certification for sustainably farmed seafood, our organizations have been actively involved with the ASC in a number of ways including, but not limited to, advisors on the Aquaculture Dialogues, members to the Technical Advisory Group, and stakeholders in ongoing certification audits.

The CAR have now been operational for over three years and in this time we have had the opportunity to monitor and review how these requirements are being interpreted and applied by third party auditors. An analysis of how the CAR is being applied in practice (i.e. by reviewing recent certification audits) quickly demonstrates that interpretation and application of the CAR are inconsistent at best and in many cases fail to uphold the level of credibility intended by the CAR. A pertinent example here is a recent certification of *Salmones Multiexport S.A. Chile Arbolito site*, wherein the certification was granted with open conditions on 67 minor non-conformities. Upon granting of the certification, no action plan was created to address any of the 67 minor non-conformities observed during the initial audit. We recognize that this example represents one end of the spectrum, but it clearly demonstrates a weakness in the CAR that is undermining the spirit of the ASC standards.

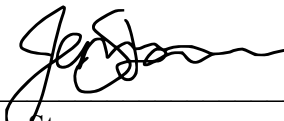
We agree that it is both timely and important to review the CAR and appreciate the opportunity to provide comment in this process. In addition to our comments attached



herein in the requested excel template, we would also strongly advise you to complete an internal review of ASC audits done to date. This review should evaluate the performance of conformity assessment bodies (CABs) by analyzing the number and appropriateness of major and minor non-conformities that are being included as open conditions on approved certifications. This type of review would go a long way to providing solid evidence that compliance and / or adherence to the ASC standards is happening to a sufficient level to provide confidence in the ASC brand and process to stakeholders involved at all levels of the sustainable seafood movement. The ASC is a very important entity in the movement and it's important that every opportunity to build confidence in its process is taken.

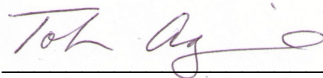
Thank you again for the opportunity to comment during the Certification and Accreditation Requirements public consultation period. We look forward to hearing from you as to how our feedback is being addressed. Should you have any questions or interest in discussing the comments herein, please contact Jenna Stoner at [jstoner@livingoceans.org](mailto:jstoner@livingoceans.org) or (604) 696-5045.

Sincerely,



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Jenna Stoner  
Sustainable Seafood Campaign Manager  
Living Oceans Society  
On behalf of SeaChoice



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Tobias Aguirre  
Executive Director  
FishWise



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Corey Peet  
Aquaculture Program Manager  
Monterey Bay Aquarium