

September 9, 2017

Mr. Chris Ninnes, CEO (chris.ninnes@asc-aqua.org)
Aquaculture Stewardship Council
P.O. Box 19107
3501 DC Utrecht
The Netherlands

Dear Mr. Ninnes,

We are pleased to provide you with an advance copy of SeaChoice's summary report *What's behind the label? Assessing the impact of MSC and ASC Seafood Certifications in Canada*. Also included is the final version of the full Technical Report, a draft of which was reviewed by ASC. We ask that you share these documents with relevant ASC staff, the Supervisory Board and the Technical Advisory Group.

The SeaChoice Steering Committee appreciates ASC engagement with reviewing the technical report and submitting a detailed response. We have included ASC's response as an Appendix to the technical report.

We urge the ASC to address the key findings and enact the recommendations outlined in our technical report in a timely manner. ASC's response to the draft Technical Report raises concerns that some of these issues may not be addressed, or not addressed promptly.

We applaud the ASC for establishing a Programme Integrity Team and working to strengthen the Quality Assurance framework. However, we highlight three responses that raise on-going concerns:

1. Variance request (VR) approval process.

We welcome the news that ASC is conducting a review of the VR process. However we are concerned that there is no timeline or completion date defined for the review. Furthermore, the response does not indicate whether stakeholder engagement will be incorporated into the process. We strongly suggest this review is completed within the coming year and, in the meantime, the current process is opened to local stakeholder input (e.g. a 2-week comment period after posting on the VR website);

2. Raising a major non-compliance during the validity of a certificate and procedures for suspension and withdrawal.

The ASC response defers action on these issues to the next revision of the CAR, which would likely result in an “effective date” of at least 2-3 years from now. With this scale of time lag the problems highlighted in our report will continue and will reduce the credibility of the ASC certification in many quarters. Immediate auditor guidance is required to deal with farms in major non-conformance, that either should not have been certified in the first place, or whose certification should be suspended due to a major non-conformity. Currently, fish from these situations are being sold with the ASC logo, creating another credibility risk; and

3. Unit of Certification.

The ASC response to evidence that farmed salmon are appearing in the marketplace when significant portions of their lifecycle and growing facilities are never audited is to defer to a future operational review of the Salmon Standard. We submit this is unacceptable, is a clear violation of ASC’s own standards and goes against the definition of ‘unit of certification’ found in the CAR. Assessing all stages of the production cycle for environmental and social compliance has been a fundamental principle since the Aquaculture Dialogues. Suggesting otherwise undermines and possibly voids ASC’s purpose “to credibly offer measurable, performance-based requirements that minimise or eliminate the key negative environmental and social impacts”. The ASC should provide immediate auditor guidance that the unit of certification includes all production cycle stages, as per the CAR.

SeaChoice would like to be able to agree with ASC’s statement on page 1 of its response to our report:

“***The standard as applied*** has the net effect of pushing producers to perform to comprehensive, transparent criteria that is unmatched in any other single jurisdiction” [emphasis added].

While we see the potential for the Standard, as written, to achieve a net positive effect our report shows that the ‘on the water’ application of the Salmon Standard is not reaching this goal. We strongly suggest this is due to the highlighted concerns which are undermining the potential net effect the Standard could have.

The coming year will see a number of significant changes to the ASC scheme, including the harmonizing of all individual single species Standards under one core Standard and the enabling of groups of farm sites to be certified at once under the multi-site and group methodologies. These strategic shifts will move the ASC further away from the original intent of the multi-stakeholder agreements that established the Standard(s). We are concerned that, left unresolved, our identified concerns will be further exacerbated by these new changes.

The SeaChoice Steering Committee looks forward to further dialogue on how the ASC can address these concerns in a timely manner.

Sincerely,



Susanna Fuller
Ecology Action Centre



Bill Wareham
David Suzuki Foundation



Karen Wristen
Living Oceans Society