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Stakeholder Submission RE: Initial Full Assessment Report, Marine Harvest Canada's Mahatta East farm, by Acoura.

Upon review of the draft Aquaculture Stewardship Council (ASC) audit for Marine Harvest Canada's Mahatta East farm, conducted by Acoura, we have deep concerns about the robustness of the audit.

We find the draft audit report to be insufficient in evidence to demonstrate the farm successfully met the salmon standard criteria. We submit this is due to Acoura failing to meet the requirements of the ASC Certification and Accreditation Requirements (CAR) and the Salmon Standard Audit Manual.

Our comments and concerns are provided in detail below. We look forward to hearing how the Acoura will address these outstanding concerns.

Sincerely,

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I. Process Requirements and Audit Timing

a) Insufficient records and evidence

A number of salmon standard indicators are listed in the audit report as “conforming” despite insufficient records or evidence due to the audit taking place before the harvest. The ASC Certification and Accreditation Requirements (CAR) Version 2.0 has the following stated Process Requirements (17):

17.1 Unit of Certification

17.1.2.1 All clients seeking certification shall have available records of performance data covering the periods of time specified in the standard(s) against which the audit(s) is to be conducted; and

17.4 Audit Timing

17.4.5 Audits shall not be conducted until sufficient records/evidence are available for all applicable standard requirements as the minimum.

With the audit taking place before harvest, the records and evidence for the applicable standard requirements are simply not available. For example, 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).

The indicators above are listed as “conforming”, despite not having available any of the records and evidence required.

The CAR requires sufficient records and evidence for the initial full assessment audit, requiring a complete production cycle in order to confirm conformance with all applicable salmon standard indicators. An incomplete production cycle equates to incomplete evidence and records.

Insufficient evidence and records remain a concern we have highlighted in other audit reviews. On review, the limited evidence and records that are provided in the audit reports are either based on data from the current production cycle at the time of the early audit or the previous production cycle. Therefore, the reports fail to provide a full production cycle of data for the most recent cohort of fish.

Listing indicators that require a full production cycle of data as ‘conforming’ - despite approximately four to six months’ worth of production cycle yet to be completed - allows for the potential for non-conforming product to be certified and enter the market with the ASC logo. At the very least, non-

conformance should be raised for the indicators for which a full production cycle worth of data is needed. The non-conformance should be closed before certification is granted.

The full assessment audit failed to meet CARv2.0 17.4.5 requirements, as the data and sufficient records/evidence covering the periods of time specified and required in the salmon standard were not yet available. Consequently, we find the CAB failed to meet their obligations under the ASC's CAR.

II. Salmon Standard Requirements

For the Salmon Standard indicators below, we submit the CAB did not conform to the following CARv2.0 requirement:

17.3 Audit methodology

17.3.1 The ASC audit shall use the ASC Audit Manual as guidance for the standard(s) for which the client is being audited.

Further details to our reasoning are provided below.

a) Indicator 2.2.3 For Jurisdictions that have national or regional coastal water targets...; and Indicator 2.2.4 Evidence of weekly monitoring...

The draft Mahatta East audit report fails to reference or apply variance 198 to Indicator 2.2.3. VR 198 appropriately states,

“Chile and **Canada** are amongst the salmon production regions which **do not have such a national classification and therefore they are bound by indicator 2.2.4.**”

As acknowledged by the variance request, with no national water classification, Canadian farms are required to comply with Indicator 2.2.4. The Canadian Council of Ministers of the Environment (CCME) 2012 guidelines for water quality referenced here do not meet the definition of “national or regional water quality targets”. The ASC standard identifies nitrate, phosphorus and chlorophyll A (footnote 16) as the related nutrients for water quality targets. CCME guidelines only measure nitrate and cannot be used as evidence of “national water classification”.

VR 198 was approved by the ASC VR-committee on the 13th November 2016. As per the ASC’s variance process, the reapplication of an approved variance occurs when a “certifier encounters an identical situation for which an earlier variance request has been submitted and approved”.¹

The farm ought to be required to demonstrate compliance with Indicator 2.2.4; or an application should be made to apply the provisions of Variance 198 to this audit.

b) Indicator 3.2.2 If a non-native species is being produced, evidence of scientific research...

The auditor notes “the farm produces Atlantic salmon which is a non-native species” and cites Andres 2015.

¹ <https://www.asc-aqua.org/what-you-can-do/get-certified/about-our-certification/>

The ASC requires a credible methodology for non-native escape monitoring. Scientific studies show escapes remain a concern² and monitoring conducted by Andres³ was limited in scope and methodology. Monitoring by DFO for non-native establishment has been largely non-existent and, until recently, their Atlantic Salmon Watch program defunct. A recent study found DFO wild salmon monitoring to woefully inadequate, with around half of B.C. wild salmon streams not monitored⁴ – therefore making it virtually impossible to detect non-native salmon.

Specifically, evidence of compliance for 3.2.2C requires:

“C. Confirm that the scientific research included: multi-year monitoring for non-native farmed species; used credible methodologies & analyses; and underwent peer review...”

No such scientific study, as required by the ASC, currently exists for the B.C. region. An independent scientific research study that is multi-year, with credible and appropriate methodology and analyses and underwent peer review should be required for B.C. salmon farmers to demonstrate compliance with Indicator 3.2.2.

c) Indicator 5.2.5 Maximum farm level cumulative Parasiticide Treatment Index (PTI) score...

Marine Harvest’s October 2017 sea lice report⁵ stated the farm’s intent to administer SLICE for mid-November. Following the on-site audit (6th November 2017), a SLICE treatment was administered on the 12th November 2017 at the Mahatta site.⁶ Consequently, indicator 5.2.5 (Parasiticide Treatment Index score) should be updated to reflect a score of 3.2.

² Volpe, J., B. Glickman et al. (2001). "Reproduction of aquaculture Atlantic salmon in a controlled stream channel on Vancouver Island, British Columbia." Transactions of the American Fisheries Society 130: 489-494.

Volpe, J., E. Taylor, et al. (2000). "Evidence of natural reproduction of aquaculture-escaped Atlantic salmon in a coastal British Columbia river." Conservation Biology 14: 899-903.

Fisher, A.C., Volpe, J.P. & Fisher, J.T. 2014. Occupancy dynamics of escaped farmed Atlantic salmon in Canadian Pacific coastal salmon streams: implications for sustained invasions Biol Invasions (2014) 16: 2137. doi:10.1007/s10530-014-0653-x

³ Andres, B. 2015. Summary of reported Atlantic salmon (Salmon salar) catches and sightings in British Columbia and results of field work conducted in 2011 and 2012. Can. Tech. Rep. Fish. Aquat. Sci. 3061: 19 p.

⁴ Price, MHH, English, KK, Rosenberger, AG, MacDuffee, M & Reynolds, JD (2017). Canada’s Wild Salmon Policy: an assessment of conservation progress in British Columbia, Canadian Journal of Fisheries and Aquatic Sciences, <https://doi.org/10.1139/cjfas-2017-0127>

⁵ http://marineharvest.ca/globalassets/canada/pdf/additional-information-sharing/2017-sea-lice/mhc_allsites_oct_2017_web.pdf

⁶ http://marineharvest.ca/globalassets/canada/pdf/additional-information-sharing/mhcallsites_nov_2017_web.pdf

- d) Indicator 5.2.6 For farms with a cumulative PTI ≥ 6 in the most recent production cycle, demonstration that parasiticide load is at least 15% less than that of average of the two previous production cycles**

The ASC salmon standard audit manual states:

a. Review PTI scores from 5.2.5a to determine if cumulative PTI ≥ 6 in the most recent production cycle. If yes, proceed to 5.2.6b; if no, Indicator 5.2.6 does not apply.

The draft audit report states the most recent completed production cycle had a 12.8 PTI score. Consequently, following the audit manual, the auditor is required to calculate the parasiticide load (5.2.6b), calculate the average for the most recent *and the two previous cycles* and “verify that parasiticide load for the most recent production cycle is at least 15% less than that of the two previous cycles” (5.2.6c). In addition, 5.2.6d requires farms to submit PTI data to the ASC.

Indicator requirements 5.2.6b-d are inappropriately listed as “N/A first assessment” in the draft audit report. The farm is listed as “compliant” with indicator 5.2.6. We submit the auditor has failed to complete or provide evidence of compliance with 5.2.6b-d as required.

e) Smolt Requirements 8.22/8.23 Indigenous consultation

The draft audit report fails to acknowledge that the Ocean Falls hatchery resides in the Heiltsuk Nation territory. On 24th November 2017, the Heiltsuk Tribal Council released a media advisory⁷ stating “Heiltsuk leadership terminated their stewardship protocol agreement with Marine Harvest Canada Inc. related to their hatchery in Ocean Falls, BC, stating that “Marine Harvest’s business can no longer be condoned by Heiltsuk”. The media release was in support for ‘Namgis, Musmagw Dzawada’enuwx and Kwikwasutinuzw Haxwamis who have vocally declared their opposition to fish farms in their territory for nearly 30 years.

The draft audit report states “All smolts are supplied internally” and fails to assess MHC’s compliance to indicators 8.22/8.23. The draft audit report should appropriately identify the territory where a hatchery or net-pen farm resides and whether consultation/agreements comply with the salmon standard.

⁷ <http://respectourenvironment.com/northern-nations-stand-in-solidarity-with-occupations>