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Stakeholder Submission RE: Initial Full Assessment Report, Cermaq Canada's Saranac farm, by SAI Global Assurances Services

Upon review of the draft Aquaculture Stewardship Council (ASC) audit for Cermaq Canada's Saranac farm, conducted by SAI Global, we have concerns about the robustness of the audit.

We find the draft audit report to be insufficient in evidence to demonstrate the farms successfully met the salmon standard criteria. We submit this is due to SAI Global 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 SAI Global will address these outstanding concerns.

Sincerely,

Kelly Roebuck Sustainable Seafood Campaigner Living Oceans Society

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Witness of harvest for the principle product

The ASC CAR V2.0 requires that "*The CAB's initial audit should include harvesting activities of the* <u>principle product</u> to be audited." (Audit Timing 17.4.2). Nevertheless, if the harvest is not witnessed at the initial audit, then the CAR requires:

17.4.7 An audit conducted during the harvesting of the <u>principle product</u> included for certification shall occur at least once during the validity of each certificate.

The draft audit reports fails to state whether harvesting at Saranac farm was witnessed, although it can be safe to assume it was not given benthic sampling at peak biomass was yet to occur. The auditor also failed to provide an alternative date for when harvesting will be witnessed during the validity of the certificate.

In previous audits, SAI Global have suggested the witnessing of harvest at *another* Cermaq Canada farm in the future is sufficient for meeting the CAR's requirement of "harvest activities of the principle product" (17.4.2). Fish processed from other Cermaq sites, including other ASC-certified farms, do not meet the definition of the 'principle product' in the context of individual farm audits and, therefore, should not be used as a substitute in meeting auditing requirements. Substituting another Cermaq Canada site for the principle product (i.e. Saranac farm) is a clear breach of the CAR requirements.

Furthermore, we disagree with SAI Global's recent assertion that "the principle product is Atlantic salmon" (SAI Global response letter, Millar Channel and Ross Pass). The company's chosen species of stock is irrelevant in the context of the unit of certification (i.e. the farm). Whilst the operating procedures and technology used are likely to be uniform across the company - the practical application of the harvest procedure and chain of custody should be assessed at the unit of certification level.

Salmon Standard Requirements

For the Salmon Standard indicators below, we submit the CAB did not conform to the following CARv2.1 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) Indicators 2.1.1; 2.1.2; 2.1.3 (benthic monitoring) and 4.7.3; 4.7.4 (copper monitoring)

The ASC audit manual states benthic and copper monitoring indicators must follow the sampling methodology outlined in *Appendix I-1 Sampling methodology for calculation of faunal index, macrofaunal taxa, sulphide and redox, and copper.*

With the release of Salmon Standard Version1.1, Appendix I-1 was updated with the following auditing guidelines:

Although the site visit should coincide with harvest period, it may be undertaken before end of harvest (at >75% peak biomass) and estimates of indicators requiring data from peak biomass / end of cycle provided in the draft report. The CAB shall review actual figures before the certification decision is made and include these figures in the final report.

Methodology for auditing indicators relating to peak biomass and end of cycle:

1) CABs shall carry out site visit audit at >75% peak biomass.

2) At the time of the audit the farm shall provide the CAB with estimates of values at that date for indicators that rely on information only available with [sic] the farm reaches peak biomass / end of cycle. The Farm shall provide the CAB with values of samples taken at peak biomass and end of cycle when they become available.

3) **CAB shall raise a non-conformity for indicators where estimated values** are used instead of actual values and note the estimated value in the draft audit report. It shall be explained in the draft audit report where figures are estimated and explain that these are to be updated in the final audit report.

4) CAB shall review the actual values and supporting evidence when they come back at peak biomass / end of cycle in order to make a certification decision.

5) CAB shall not make a certification decision and issue final report until actual values are **provided** for all indicators except biotic indicators 2.1.2 and 2.1.3.

6) In the case that biotic values are not available at the time of drafting the final report the CAB shall carry out a risk assessment to evaluate whether the biotic values are likely to meet the ASC standard. If the CAB finds evidence that the results of the biotic analyses are likely to meet the ASC standard then certification can be granted.

7) The CAB shall review biotic findings at the surveillance audit and raise non-conformities as appropriate when results have been found not meet the ASC standard. [emphasis added]

The draft report does not confirm whether the site visit audits were conducted at the required >75% peak biomass – as per 1) of the methodology. Additionally, the report does not cite any estimates of values (based on the audit date) for the current production cycle for either the benthic (2.1.1;2.1.2;2.1.3) or copper sampling (4.7.3;4.7.4) - as per 2) and 3) of the methodology.

Although non-conformities have been raised for Saranac farm for the benthic and copper indicators – these have not been processed a per the Appendix I-1 methodology.

We submit the CAB has failed to follow Salmon Standard v1.1. Appendix I-1 and its methodology for auditing indicators relating to peak biomass and end of cycle.

b) Indicator 3.1.7 In areas of wild salmonids, maximum on-farm lice levels during sensitive periods for wild fish...

Both audit reports cite variance request 88. Approved ASC variance requests 88, 90 and 141, for Indicator 3.1.7 *In areas of wild salmonids, maximum on-farm lice levels during sensitive periods for wild fish,* defer to Fisheries and Oceans Canada's (DFO) PAR threshold of 3 motile lice per fish instead of the ASC requirement of 0.1 mature female lice per fish.

While the content and interpretation of the sea lice variances remain under further discussion within ASC and Accreditation Services International, we maintain the practical application of the variance by SAI Global is flawed and does not meet the intent of the sea lice indicator – which is to protect migrating juvenile wild salmon from elevated sea lice loads.

Saranac farm (and indeed any B.C. farm) should need to demonstrate meeting the 3 motile lice per fish threshold in order to be certified for the ASC Salmon Standard.

The table below shows Saranac farm exceeded the PAR 3 motile/per fish threshold in May 2017 – during the sensitive period.

Date	DFO Motile/per fish (industry)	Cermaq reporting	Notes
May	3.93		Area management action underway; 2nd count precluded by management action
3 May		3.1	
4 May		5.43	
5 May		3.17	

Table: Saranac farm May 2017 sea lice counts

By applying no upper limit on absolute lice abundance, or on lice per fish, the CAB is replacing a metric indicator with a loose management objective. As such, B.C. farms are being treated as 'exempt' from Salmon Standard indicator 3.1.7. We submit this is grossly inappropriate.

Under the Marine Finfish Aquaculture Licence under the Fisheries Act,¹ companies are required to:

¹ http://www.pac.dfo-mpo.gc.ca/aquaculture/licence-permis/docs/licence-cond-permis-mar/licence-cond-permis-mar-eng.pdf

"6.4 Starting March 1, 2017, the licence holder must conduct annual sampling between March 1 and June 30 for the term set out in this licence. The licence holder cultivating Atlantic salmon and trout must carry out a sea lice abundance assessment every two weeks, at minimum, for fish held in containment structures for more than 30 calendar days. Where data collected in Appendix VI-A indicates the sea lice abundance threshold of three motile Lepeophtheirus salmonis has been exceeded, the licence holder must:

(a)within 15 calendar days of the discovery, implement a plan which will reduce the absolute sea lice inventory within the containment structure array; and
(b) notify the Department as per section 7.1 and 7.3"

A Major Non-conformity should have been raised for the May 2017 breach and closed with appropriate evidence to demonstrate action was taken as per 6.4 of the Licence conditions and within the required 15 calendar days.

c) Indicator 3.2.2 If a non-native species is being produced, evidence of scientific research [41] 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

The auditor notes "the farm produces Atlantic salmon which is a non-native species", yet fails to provide the scientific research on the risk of establishment of the species.

Footnote 41 of Indicator 3.2.2, states:

"The research must at a minimum include multi-year monitoring for non-native farmed species, use credible methodologies and analysis, and undergo peer review."

Specifically, the audit manual's evidence of compliance for 3.2.2C requires CABs to:

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

The auditor cites Andres (2015). Scientific studies show escapes remain a concern². The limited number of snorkel surveys actually conducted by Andres³ and his students, during the peak runs of other species, do not constitute 'monitoring'. More specifically, the Andres study did not include any water bodies within the Clayoquot region (i.e. of relevance to Saranac farm).

The ASC also requires:

... evidence of scientific research completed <u>within the past five years</u> that investigates the risk of establishment of the species within the farm's jurisdiction

Andres' surveys were completed in 2011 and 2012 - more than five years ago. DFO has not monitored for non-native establishment and, until recently, their Atlantic Salmon Watch program was defunct. A recent study found DFO wild salmon monitoring to be woefully inadequate, with around half of B.C. wild salmon streams not monitored⁴. In the absence of any monitoring at all on half of the streams known to support salmon, including those in the vicinity of Clayoquot, the potential to detect impacts from escapes is vastly reduced.

The Andres summary report is not peer reviewed, did not use a credible methodology and looked at only a limited number of Vancouver Island streams in both of the 2 years' field work reported. The only prior monitoring of those streams was conducted more than a decade earlier and it did find evidence of multiple year-classes of juvenile Atlantic salmon in two of those same streams.

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.

Canadian Journal of Fisheries and Aquatic Sciences, https://doi.org/10.1139/cjfas-2017-0127

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,