

World's salmon farms eco-certified despite missing requirements
SeaChoice report finds amendments to standard undermine eco-certification claims

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VANCOUVER — A review of salmon farm eco-certification practices around the world by SeaChoice reveals that your farmed salmon might be less sustainable than the Aquaculture Stewardship Council (ASC) eco-logo leads you to believe – only a small proportion of farms meet stipulated ASC criteria, yet they are still being certified.

“Eco-certification by a reputable organization like the ASC should indicate farms with excellent practices that meet strict criteria, without exceptions. Instead we found that only about 20 per cent of salmon farms around the world actually follow the criteria as written. People aren’t getting what they think they’re getting with the label,” said Kelly Roebuck, lead author of the report and SeaChoice representative from Living Oceans Society.

The report is the first global review to examine how well salmon farms performed to meet the ASC’s Salmon Standard, how sustainable they really are and the effects of amendments to the Standard. Two-hundred and fifty-seven farms, including farms in Australia, Canada, Chile, Norway and Scotland, were reviewed from the first certification in 2014 to March 15, 2018. This represents the majority of the world’s salmon farming regions.

ASC’s Salmon Standard requires 100 per cent compliance for successful certification. But the report found that in practice, neither the Standard nor the auditors’ guidance document is being followed as written. Instead, variances and interpretations are operating as de facto amendments of those documents, while operational reviews have been used to formally alter—and weaken—the Standard. All of these changes erode the claim that ASC certifies only best practices.

“Amendments to the Standard are overriding the multi-stakeholder agreements on which the Standard’s social licence is based. As a result, many of the intentions of the original Standard have been eroded,” stated John Werring, SeaChoice representative from the David Suzuki Foundation. SeaChoice member groups were involved in the six year long salmon aquaculture dialogues, along with industry and other NGOs, which resulted in the Salmon Standard.

Variances are allowing significant alterations to Standard criteria, changing its original intent and enabling farms that would not comply to be certified. Canadian farms with sea lice loads up to 149 times higher than the Standard and farms in Norway and Chile using sea lice chemical treatments up to 330 per cent higher than the Standard have received or maintained ASC certification.

ASC interpretations provided to auditors also breached the 100 per cent compliance requirement or violated the auditors' guidance document's rules. For example, an ASC interpretation allows auditors to omit intermediary stages (e.g. smolt or early grow-out net-pens) of the production cycle from assessment, allowing up to a year of production and resulting environmental impacts to be excluded from compliance. Consequently, an ASC label does not guarantee the fish was "farmed responsibly" from egg to harvest.

Also worrying, ASC is proposing changes that would shift the Standard to an 'aquaculture improvement project' approach. A proposed sea lice treatment amendment would allow up to a 450 per cent increase at some farms, compared to what is currently required in the amount of allowable chemical treatments and further allow some regions up to 15 years to reach an aspirational 'global target' metric.

"Eco-certifications are at risk of losing credibility and consumer trust. They only work when standards get followed and lead to genuine changes on the water. They can't just reward business as usual," said Karen Wristen, Executive Director of Living Oceans Society.

SeaChoice is calling on the ASC to immediately correct amendments that weaken the Standard's stated goal of best practice certification. "We're reaching out to ASC and are hopeful they will consider implementing key recommendations from this report in order to maintain the intent of the Standard," said Roebuck.

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SeaChoice:

SeaChoice is a collaboration of three internationally recognized organizations — the David Suzuki Foundation, Ecology Action Centre and Living Oceans Society — that use their broad, national expertise to find solutions for healthy oceans. SeaChoice is a science-based, solutions-focused influencer, advocate and watchdog leading the next evolution of seafood sustainability in Canada. SeaChoice is a member organization of the Conservation Alliance for Seafood Solutions, and works with consumers, retailers, suppliers, government and producers to accomplish its objectives.

Backgrounder:

The ASC Salmon Standard

The ASC Salmon Standard was created in 2012 following a multi-stakeholder process known as the Salmon Aquaculture Dialogue. The Standard is assessed by criteria designed to eliminate or minimize the environmental and social impacts of aquaculture. Third-party auditing companies assess farm clients against the Standard and grant certification. Version 1.1 of the standard was published in May 2017. Further information: www.asc-aqua.org.

SeaChoice's Global Review of the ASC's Salmon Standard

The report reviewed a total of 456 audits (248 initial; 189 surveillance; 19 recertification), representing 257 salmon farms from the following major salmon farming regions: Australia, Canada, Chile, Denmark and Faroe Islands, Iceland, Ireland, Norway and Scotland.

We reviewed the conformance and performance of global salmon aquaculture operations against the ASC Salmon Standard as captured by third party auditors in their certification reporting. Publicly reported data on salmon farming company websites were collected and compared to audit evidence and data. We also analysed ASC approved variances and their application within audits.

Webpage (including all report links): <http://www.seachoice.org/asc-global-review>

Summary Report: [link](#) / **Technical Report:** [link](#)

Regional Summaries:

[Australia](#)

[Canada](#)

[Chile](#)

[Denmark \(Faroe Islands\)](#)

[Ireland](#)

[Norway](#)

[U.K. \(Scotland\)](#)

Key Report Findings:

General

- 27 per cent of the global industry's production volume and 11 per cent of salmon farms are ASC certified.

Conformance

- Globally, a total of 3,726 non-conformities have been raised by auditors: 790 major and 2,936 minor.
- The average initial farm audit detected 2.33 major and 9.30 minor non-conformities. Post-certification, most farms failed to conform fully to the Standard; non-conformities were regularly detected during surveillance and recertification audits (an average of 0.98 major, 2.82 minor and 1.31 major, 4.68 minor non-conformities respectively). Only 32 (out of 456) audits had zero non-conformities: two initial and 30 surveillance audits. This demonstrates that most farms failed to continuously conform to the Standard.
- Farms in major non-compliance with the Standard have and can sell their product as ASC certified.

Performance

- Globally, no farms complied with all the Standard's area-based management requirements (i.e. monitoring and coordination of farm activities to ensure the health of the local ecosystem and wild fish).
- Faroes and Scotland registered sea lice values up to 21 times the Standard. B.C. farms reported counts up to 10 times their varied sea lice limit (and 149 times the written Standard).
- 95 per cent of audits can meet the fish meal and fish oil ratio limits. In fact, data indicates these metric criteria are likely too lenient and could be further reduced to reflect current industry best practice.
- 96 per cent of audits successfully meet the current sea lice treatment threshold. This suggests the ASC's proposal to allow more sea lice treatments under the Standard is unjustified.
- Four large public escape events at ASC certified farms could not be found addressed in audits.

Amendments: Variances, interpretations and the PTI operational review

ASC variances and process

Variance requests allow third-party auditors to seek an ASC interpretation of, or variance from, either a Salmon Standard criterion or audit requirements. The variance-request process can be used for any of the eight ASC species standards.

- Over half of ASC's approved variances relate directly to the Salmon Standard. Of the 284 variance requests currently listed on the ASC website, as of September 4th, 2018, 144 apply to the Salmon Standard alone.

- The average audit cites 2.4 variances. Only 21 per cent of certified farms follow the Standard as written (i.e. without varied criteria).
- Variances can enable farms that would otherwise be in major non-compliance with the Standard to be certified.
- ASC's variance process sometimes overrides the multi-stakeholder agreements on which the Standard's social licence is based. The process lacks stakeholder engagement, as well as independent technical and scientific advice.
- A number of variances depart from the Standard and defer to government regulations. Many of these variances were found to weaken the requirements and, thereby, also the intent to hold farms to a higher Standard than those imposed by local regulators.
- Variances can become precedent-setting, defacto regional changes to the Standard. This means farms are held to different Standard requirements in different regions.
- Auditors often apply variances as exemptions from Standard requirements. Compliance with the varied criteria can go unassessed.

ASC Interpretations

Auditors can submit questions to the ASC seeking clarification on Standard(s) requirements or CAR auditing guidelines. However, instead of clarification, some of the ASC's answers have led to substantial amendments of the Standard(s) or CAR.

- An ASC interpretation amends the CAR's 'unit of certification' definition by defining intermediary stages of the production cycle to be "out of scope". This contravenes numerous Salmon Standard indicators that rely on data or evidence derived from a full production cycle to demonstrate compliance. Consequently, up to a year is omitted from compliance with the Standard.
- An ASC interpretation allows major non-conformities to remain indefinitely open (with an action plan and assessed progress, but no stipulated deadline). This contravenes the CAR's stated deadlines for extension, closure and for initiating suspensions.

ASC Sea Lice Treatment (PTI) Operational Review

- Periodic operational reviews are conducted to ensure relevance and efficacy of the Standard to reflect best practices. The ASC initiated a review of the current PTI indicator with the rationale that the current metric is a barrier to certification. Yet, our review found 96 per cent of certified farms are able to meet the PTI. In addition:
- The proposed metrics represent an increase of up to 450 per cent (depending on the region) in the number of chemical treatments allowed. The Standard would shift to an 'aquaculture improvement project' model'; thereby allowing some farms up to 15 years to reach a 'Global Target' metric. Approximately two-thirds of the global salmon farming industry could meet the proposed metrics, suggesting that the ASC is seeking to reframe the Standard as one that merely excludes the worst performers, rather than rewarding best practices and incentivising improvement.