

ACCOUNTABILITY IN SEAFOOD SUSTAINABILITY.

SUMMARY OF FINDINGS AND RECOMMENDATIONS FOR THE BEST AQUACULTURE PRACTICES (BAP)

The Global Aquaculture Alliance (GAA) is a non-profit trade association founded in 1997 by aquaculture and food companies. In 2000, the Best Aquaculture Practices standard was developed by industry stakeholders (i.e., scientists, technicians, producers). GAA is the BAP standard holder and currently manages three farm standards, as well as processing, repacking and feed standards. BAP has a star rating system for consumer products, representing different certified facilities along the supply chain. Its standards entail meeting guidelines for food safety, environment, social responsibility, animal welfare and traceability.

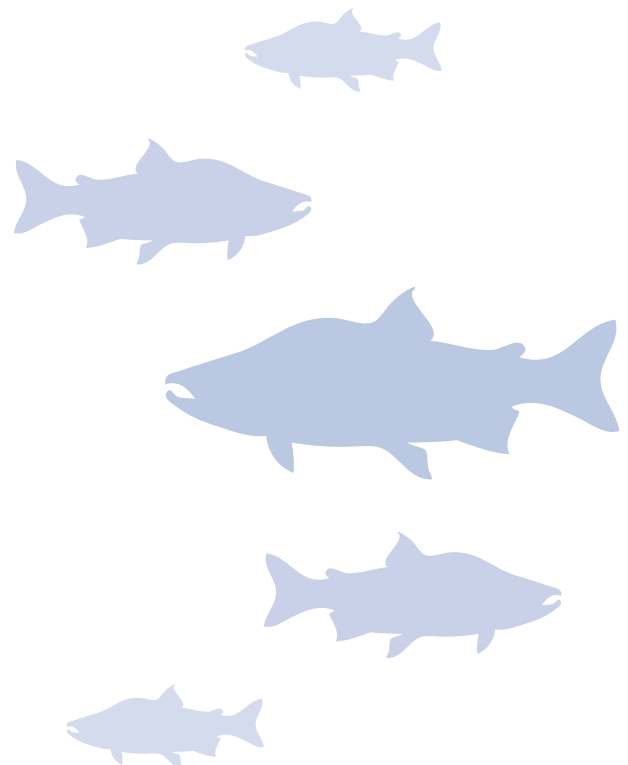


FINDINGS

① Development

The Standard Oversight Committee (SOC) is responsible for primary guidance and oversight of the standard creation and revision process. The SOC consists of four representatives from each of the following: industry, academia and NGOs. Public consultation occurs for standard creation and revisions as per the 2017 BAP Standards Development document. However, prior to this document in 2016, no public comment period was conducted for the Salmon Farm Standard Issue 2 revision. No public consultation period occurs for the auditing guidelines (known as the Requirements for Certification Bodies Offering Certification Against the Criteria of the GAA BAP Standards). When consultation has occurred, public comments, along with responses from the SOC, are made available.

BAP states that it does not implement amendments, variances or interpretations that alter standard or program rule criteria.



② Governance

The SOC consists of four industry, four academic and four conservation/social justice NGO members. Current SOC members, recruitment process and decision-making protocols are made public. Annual reports and meeting notes are not published; however, they are available on request.

BAP states that performance reviews of the SOC are conducted internally.

③ Verification

Information on the audit process, a list of certified and in-assessment (new and renewals) farms are publicly available. Certificates are not made available; instead, a BAP number is listed. The certifying body for the certified farm is not made available. To obtain the certifier's contact, stakeholders need to obtain the certificate directly from BAP or the certified facility.

No public consultation with stakeholders is conducted during the auditing process, nor are audit reports or summaries published. BAP states that this is for reasons of confidentiality. Auditors may at their discretion select individuals for an interview during the auditing process, though it is not required. Requests to access audit reports can be made; however, the producer's permission is required for the full report to be shared. In the absence of the producer's permission, the certifying body can share a summary report on request.

④ Monitoring

There is no M&E program. BAP states that it is in the process of developing a theory of change.

An outline of the auditor accreditation process and the accreditation status of auditors is public; however, accreditation reports are not. Public rules for label use are available. Label breaches are not released publicly.

⑤ Dispute settlement

Complaint procedures regarding certificate and standard-holder disputes are available. A BAP contact is provided for standard-holder complaints. Certificate complaints require plaintiffs to submit their disputes directly to the certifying body. However, as described above, BAP does not publish who the certifying body is for each certified facility. Therefore, to submit a complaint regarding a BAP facility would require obtaining the certificate from BAP or the certified facility.

The certification complaint procedure lacks an independent third-party mechanism, as it is the certification body that investigates the complaint. In the case of standard-holder disputes, the complaint is investigated internally between the BAP program integrity manager and the plaintiff. There is no public reporting on complaint investigations. Corrective actions such as withdrawal of producer certificates are not made public.

RECOMMENDATIONS

1 Ensure all new standards, revisions and auditing guidelines are subjected to a public consultation.

New and revised standards should be vetted through stakeholder consultation as per the standard development procedure. Consultation documents should be expanded to include publicly available terms of reference detailing the standard scope, geographic application, standard justification and the objectives/outcomes that the standard or revision is designed to achieve. Consultation should also be held on revisions to the auditing guidelines.

2 Include stakeholder consultation in the auditing process, including making audits and certificates available.

Civil society stakeholders should be given the opportunity to provide local expertise and knowledge. Publishing audit reports with conformance results would provide assurance to stakeholders. Publishing certificates will make the certifying bodies' contact details available to stakeholders, enabling them to provide input to the audits in a timely manner.

3 Develop a monitoring and evaluation program.

Define the theory of change. The M&E process should include stakeholder consultation. Results should help demonstrate to stakeholders the certification's impacts and effectiveness measured against the theory of change.

4 Adopt a third-party dispute-settlement mechanism.

Internal and external stakeholders should be able to dispute and submit complaints that are investigated through a fair and independent third-party mechanism to ensure conflict of interest is removed.

