



# Open letter to the Global Seafood Alliance:

Mike Kocsis  
 CEO, Global Seafood Alliance

5th May 2024

Dear Mr. Kocsis,

We the undersigned represent **76 environmental, community, and animal welfare groups** from around the globe working to protect wild fish and our marine ecosystems from the negative impacts associated with open-net pen salmon aquaculture.

We write in response to the Global Seafood Alliance's public consultation for the Best Aquaculture Practices certification Salmon Farm Standard Issue 3.0.

Firstly, we find it outrageous that GSA claims consistency with the FAO Technical Guidelines on Aquaculture Certification despite failing to meet one of the guideline's most fundamental requirements: that schemes should conduct a public comment period for every standard revision.[1][2] **The first and last public comment period held for BAP's Salmon Farm Standard was Issue 1 in 2011.**[3] At that time, the BAP standard was criticized by environmental groups for being too weak to safeguard wild salmon and our oceans from critical environmental impacts caused by salmon farms.[4] Thirteen years later, these criticisms remain.

**Despite having 13 years to move towards a more scientifically robust standard, the BAP standard still has no meaningful metric limits or performance expectations for certified farms on critical environmental impacts** such as sea lice, disease, parasiticides, antibiotics, dissolved oxygen, and endangered, threatened and protected species. Additionally, the standard's lack of strict stocking density and water quality monitoring requirements contribute to poor health and welfare outcome for the farmed salmon.

Compliance with the BAP standard simply relies on farms following local regulations and/or farm practices that are considered common practice in the industry. In other words, **the BAP standard is nothing more than a checkbox exercise of confirming a company's legal obligations, status quo farming practices and management plans.** Further, evidence from BAP farms (see below) shows that legal obligations may not be met, best practices may not be observed, and management plans may be nothing more than good intentions after the farm is certified.

As a result of relying on mere legal compliance and normal farm practices, BAP certified farms are rarely – if ever – held to account for any adverse outcomes and negative impacts that occur due to the farming operations. This has resulted in farms being certified and fish sold as “environmentally responsible” when, in reality, scientific evidence demonstrates such farms are contributing to environmental degradation of sensitive habitats (e.g., Macquarie Harbour, Tasmania) and/or the extinction of at-risk species (e.g., sea lice and disease transfer to endangered wild salmon and sea trout; low oxygen levels harming the endangered Maugean skate).

**GSA's claim that the BAP certification has “strict standards relative to the environment”[5] is simply not true. The following evidence – based on BAP certified facilities – speaks louder than GSA's claims:**

- In 2014, a year after **pleading guilty to illegal pesticide** use at 15 sites in New Brunswick leading to the death of commercially caught lobster,[6] Cooke Aquaculture achieved BAP certification for all North American sites.[7] In 2017, Cooke's Cypress Island salmon farm in Washington State collapsed releasing around 250,000 non-native Atlantic salmon into waters containing endangered Pacific salmon. These escaped salmon were found to be infected with the highly contagious and harmful Piscine Orthoreovirus (PRV).[8] Washington State agencies concluded that the **farm collapse was caused by negligence**, as pens had not been properly maintained and were fouled with impenetrable layers of mussels, kelp, and other marine growth.[9] Another review found the company “failed to identify and implement technology that will minimize fish escapements at its eight Puget Sound net pen sites and failed to utilize redundancy and over-capacity in the moorage systems”.[10]

- In 2014, Northern Harvest Sea Farms Group achieved BAP certification in Atlantic Canada.[11] In 2018, Northern Harvest was fined for **illegal pesticide use** on Head Harbour salmon farm in 2017.[12]
- In 2016, Cermaq achieved BAP certification for all of their British Columbia farms.[13] In 2018, Cermaq Canada's Clayoquot Sound farms recorded **dangerously high sea lice levels up to 51 lice per fish**. [14] [15] Exceedances of treatment thresholds prescribed as conditions of licence are common on Cermaq's Clayoquot farms and occurred during the juvenile salmon outmigration in 2018, 2019, 2020, 2021 and 2022.[16] Lice loads this high are lethal to immature fish. In 2020, samples from Clayoquot farms **tested positive for the PRV virus**. [17] Wild salmon returns in Clayoquot Sound, where riparian habitat is pristine, have reached historic lows, with sea lice and pathogens continuing to act as primary threats.
- In 2017 and 2019, videos showed 'bloodwater' effluent being released from BAP certified salmon processing facility Browns Bay packing in British Columbia. The effluent **tested positive for PRV virus**. [18] The virus was later assessed in the lab for its ability to infect fish and was found to be live and infective. [19]
- In 2021, Nova Austral achieved BAP certification for five farms [20] including Arcena 1 site **located in the Alberto de Agostini National Park**, Chile. In 2023, Chile's environmental agency initiated sanctioning procedures related to the **overproduction** at Arcena 1 farm during the 2019-2021 cycle. [21] Arcena 1 remains certified according to the BAP website. [22]
- In 2021, Multi X achieved BAP certification for its May farm situated in the "**Las Guaitecas**" **National Reserve**, Chile. [23] In 2023, Chile's environmental agency initiated sanctioning procedures related to the **overproduction** at the May farm during the 2018-2020 cycle. [24] May farm remains certified according to the BAP website. [25]
- In 2023, Skretting Norway attained BAP certification. [26] It sources fish oil from Mauritania and participates in the Mauritanian Small Pelagics fishery improvement project (FIP), which has been criticized by NGOs and small-scale fishermen in West Africa for **driving overfishing**. [27] The production of fish oil for the Norwegian aquaculture industry is fueling food insecurity and loss of livelihoods throughout the region.
- In 2023, Australian Government Conservation Advice identified low oxygen levels caused by Macquarie Harbour salmon farms as the "**primary threat**" to the **endangered Maugean skate**. [28] BAP has certified farms in the harbour since 2014. By 2015, scientific reports showed widespread ecosystem degradation throughout the harbour and underneath salmon farms. A review commissioned by WWF highlighted the limitations of the BAP certification in preventing adverse impacts. [29] Macquarie Harbour farms have remained certified despite calls from more than 80 groups to revoke BAP certification due to clear scientific evidence of impact to the Maugean skate. [30] A formal complaint submitted by environmental groups to GSA identified that the BAP standard's absence of a metric limit for dissolved oxygen and the reliance on the local regulator's licence conditions, that have been found by two independent reviews to be inadequate, meant **impacts to the skate are not considered under the BAP Standard and thus go undetected and unpenalized**. [31] Shockingly, GSA unashamedly dismissed this evidence and complaint. [32]

Due to a lack of transparency by the BAP certification, it is impossible to know whether the BAP label was removed from products from the above farms. There is, however, evidence that BAP-certified Macquarie Harbour salmon enters the supermarkets with the BAP label or under the guise of ‘responsibly sourced’ supermarket labels, according to a formal complaint of greenwashing submitted to the Australian Competition and Consumer Commission by the Environmental Defenders Office on behalf of several environmental groups.[33]

BAP audits are conducted behind closed doors with no civil society stakeholder consultation and no published audit reports to demonstrate a farm’s compliance with BAP standards.[34] Therefore, it is safe to assume there are many more situations where BAP farms linked with adverse environmental impacts have gone on to sell product to unsuspecting consumers with misleading claims of “best practice” and “environmentally responsible”.

In fact, **recent investigations by the Outlaw Ocean Project and Corporate Accountability Lab uncovered serious allegations** of forced labor, child labor, worker exploitation and dangerous working conditions in the Indian shrimp supply chain – **including BAP-certified** hatcheries, shrimp farms and processing plants.[35][36] CAL’s report, *Hidden Harvest: Human Rights and Environmental Abuses in India’s Shrimp Industry*, details how hatcheries and farms release contaminated waste into local waterways.[37] Groundwater and drinking water of nearby communities, agricultural lands and fishing waters are polluted by the effluent. Sensitive coastal habitats, including mangroves, are destroyed to build shrimp hatcheries and farms.

BAP was also found to exclude crucial stages of the supply chain from compliance, masking stages of production at **high risk of labor abuses and forced labor**. Evidence showed audits were often compromised, resulting in missed or ignored violations. CAL concluded that despite seafood certifications – including BAP – reassuring customers with claims of responsibly produced seafood, in reality, they “function as little more than marketing ploys that fail to protect workers or the environment”. [38]

We have also come to the conclusion that BAP is little more than an industry-established and dominated marketing scheme that functions to protect the salmon farming industry – not wild fish or marine life. Nor does it appropriately consider the welfare of the farmed fish.

**Salmon Farm Standard 3.0 confirms that BAP is content with setting a very low bar for farms to qualify for certification and continuing the greenwashing of unsustainable practices, including contributing to the extinction of wild fish.**

**We will continue to call out and challenge BAP for misleading consumers by greenwashing unsustainable, illegal, and inhumane practices.**

Sincerely,

*ADAC Chiloe (Asociación Defensa Ambiente y Cultura), Chile*

*Animal Justice Party Tasmania, Australia*

*Animal Welfare Institute, USA*

*Animals Australia, Australia*

*Atlantic Salmon Federation, Canada*

*Bob Brown Foundation, Australia*

*Captain Paul Watson Foundation, Australia*

*Centinela Patagonia, Chile*

*Clayoquot Action, Canada*

*Conservation Council of New Brunswick, Canada*

*Corporate Accountability Lab, USA*

*David Suzuki Foundation, Canada*

*Deutsche Stiftung Meeresschutz, Germany*

*Doug Frantz and Catherine Collins, Salmon Wars, Canada*

*Dr Julien Arnijo, France*

*Ecology Action Centre, Canada*

*Ekō, Global*

*Endangered Species Protection Agency, UK*

*Environment Tasmania, Australia*

*Ethical Farming Ireland, Ireland*

*Feedback, UK*

*Friends of North Bruny Inc, Australia*

*Friends of the Bay, Australia*

*Gallifrey Foundation, Switzerland*

*Galway Bay Against Salmon Cages, Ireland*

*Georgia Strait Alliance, Canada*

*Global Salmon Farming Resistance, Argentina*

*Greenpeace, Canada*

*Greenpeace, Switzerland*

*Guardians of the Sounds, New Zealand*

*Healthy Bays Network, Canada*

*Humane Society International, Australia*

*Ingen Burfisk i Havet, Denmark*

*Inside Scottish Salmon Feedlots, Scotland*

*International Marine Mammal Project of Earth*

*Island Institute, USA*

*Katheti AMKE, Greece*

*Keep Our Coast Clean, Australia*

*Killora Community Association, Australia*

*Living Oceans Society, Canada*

*LOWCO Au, Australia*

*Marine Protection Tasmania, Australia*

*Native Fish Society, USA*

*Nature Canada, Canada*

*Neighbours of Fish Farming, Australia*

*North Atlantic Salmon Fund, Iceland*

*NWTas for Clean Oceans Inc., Australia*

*Oceanic Preservation Society, USA*

*Planet Oceans, USA*

*Por el Mar, Argentina*

*Pro Wildlife, Germany*

*Protect Maine's Fishing Heritage Foundation, USA*

*Rauch Foundation, USA*

*Rob Stewart Foundation, Canada*

*Roberto Jaquier, Sweden*

*Salmon Camera International, Norway*

*Salmon Camera, Norway*

*Salmon Watch Ireland, Ireland*

*Salmonid Association Eastern Newfoundland, Canada*

*Sea Shepherd, Australia*

*Sea Shepherd, Portugal*

*SeaChoice, Canada*

*Sharks Education Institute, Portugal*

*Surfrider Tasmania, Australia*

*Tánana Pictures, Chile*

*Tasman Peninsula for Marine Protection, Australia*

*Tasmanian Alliance for Marine Protection, Australia*

*VÁ! félag um vernd fjarðar, Iceland*

*Watershed Watch Salmon Society, Canada*

*Wild Fish Conservancy, USA*

*Wilderness Society Tasmania, Australia*

*WildFish, Scotland*

*World Animal Protection, Australia*

*World Salmon Forum, USA*

## References

- [1] <https://www.bspcertification.org/Downloadables/pdf/GSA%20-%20Standards%20Process%20Document%20-%20Issue%203.0%20-%2025-February-2022.pdf>
- [2] <https://www.fao.org/documents/card/en/c/0ec15d4a-6295-51a5-af16-5c724c62de25>
- [3] <https://www.bapcertification.org/Downloadables/pdf/bap-salmonf-com.pdf>
- [4] <https://www.seafoodsource.com/news/aquaculture/suzuki-farmed-salmon-standards-are-weak>
- [5] <https://bap.globalseafood.org/>
- [6] R. v. Kelly Cove Salmon Ltd. <https://www.cbc.ca/news/canada/new-brunswick/aquaculture-company-on-the-hook-for-500k-for-pesticide-use-1.1317105>
- [7] <https://cookeseafood.com/about-cooke/>
- [8] <https://wildfishconservancy.org/contrary-to-agency-claims-escaped-atlantic-salmon-were-infected-with-a-highly-contagious-and-harmful-virus/>
- [9] <http://www.intrafish.com/aquaculture/cooke-to-pay-332-000-fine-for-washington-salmon-pen-collapse/2-1-594956>
- [10] <https://wildfishconservancy.org/wp-content/uploads/2021/11/Tobias-Dewhurst-report.pdf>
- [11] <https://thefishsite.com/articles/northern-harvest-salmon-obtains-fourstar-bap-status>
- [12] <https://www.cbc.ca/news/canada/new-brunswick/pesticides-aquaculture-atlantic-salmon-campobello-cooke-1.4664184>
- [13] <https://www.fishfarmingexpert.com/cermaq-hits-4-stars/1168619>
- [14] <https://theyee.ca/Analysis/2018/05/17/Sea-Lice-Overwhelms-Fish-Farms-Clayoquot-Sound/>
- [15] <https://open.canada.ca/data/en/dataset/3cafbe89-c98b-4b44-88f1-594e8d28838d>
- [16] Ibid.
- [17] <https://thenarwhal.ca/highly-contagious-virus-found-in-majority-of-clayoquot-sound-salmon-farms-report/>
- [18] <https://www.intrafish.com/aquaculture/cermaq-bc-government-defend-browns-bay-amid-gaa-asc-scrutiny/2-1-720845>
- [19] <https://vancouver.sun.com/news/local-news/sample-of-b-c-farmed-salmon-blood-water-tests-positive-for-virus-critic>
- [20] <https://nova-austral.cl/nova-austral-achieves-new-international-certification-best-aquaculture-practices-bap-for-its-hatchery-processing-plant-and-five-farming-centers/>
- [21] <https://weareaquaculture.com/news/33318>
- [22] <https://www.bapcertification.org/Producers>
- [23] <https://www.multi-xsalmon.com/wp-content/uploads/2021/10/F10539J.21-BAP-May.pdf>
- [24] <https://weareaquaculture.com/news/33318>
- [25] <https://www.bapcertification.org/Producers>
- [26] <https://www.globalseafood.org/blog/skretting-feed-mill-first-in-norway-to-earn-bap-certification/>
- [27] <https://feedbackglobal.org/wp-content/uploads/2024/01/Feedback-BlueEmpire-Jan24.pdf>
- [28] <https://www.environment.gov.au/biodiversity/threatened/species/pubs/83504-conservation-advice-06092023.pdf>
- [29] [https://assets.wwf.org.au/image/upload/v1/website-media/resources/Review-of-Ecostandards-for-salmon-farming-in-MH\\_1Sept2021?\\_a=ATO2Ba20](https://assets.wwf.org.au/image/upload/v1/website-media/resources/Review-of-Ecostandards-for-salmon-farming-in-MH_1Sept2021?_a=ATO2Ba20)
- [30] <https://www.theguardian.com/australia-news/2023/jul/25/global-calls-to-revoke-misleading-sustainable-farming-certification-for-salmon-in-tasmanias-macquarie-harbour>
- [31] [https://drive.google.com/file/d/11TL\\_6fyTR4PuRGnoU0MMYRpRqC8Pf\\_sX/view?usp=sharing](https://drive.google.com/file/d/11TL_6fyTR4PuRGnoU0MMYRpRqC8Pf_sX/view?usp=sharing)
- [32] <https://www.seachoice.org/press-release/farmed-salmon-certifications-confirm-their-complicity-while-supermarkets-continue-to-profit-from-extinction/>
- [33] [https://aks3.eko.org/images/20231201\\_ACCC\\_complaint\\_re\\_representations\\_relating\\_to\\_salmon\\_products.pdf](https://aks3.eko.org/images/20231201_ACCC_complaint_re_representations_relating_to_salmon_products.pdf)
- [34] <https://www.seachoice.org/wp-content/uploads/2021/05/Accountability-in-Seafood-Sustainability.pdf>
- [35] <https://www.theoutlawocean.com/investigations/india-shrimp-a-growing-goliath/discussion/stakeholders/global-seafood-alliance/>
- [36] <https://www.theoutlawocean.com/investigations/india-shrimp-a-growing-goliath/the-whistleblower/>
- [37] <https://corpaccountabilitylab.org/hidden-harvest>
- [38] Ibid.