

Suggestions for Alignment of Aquaculture Dialogue Standards

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In this document, the indicators of seven aquaculture dialogues have been collated and condensed into a matrix that depicts where similarities and differences lie across the dialogues. Three of the seven dialogues had not yet finished at the time of writing, therefore drafts of the standards were used in lieu of the final standards. This provides a glimpse into the current nature of the aquaculture dialogues. The intention of this project was to glean which indicators were most common across dialogues, so that they might be considered as a potential template along which to align any future aquaculture species that may come up for certification standards. Below, indicators are grouped in text boxes by how often they are mentioned across the dialogues. (Exact wording of indicators may or may not be used, but general concept is always represented). A short discussion accompanies each text box. There is also a discussion of indicators that involve public transparency at the end.

Indicators shared by all 7 dialogues

- Energy consumption by source/information monitored relative to production and ongoing effort to improve efficiency
- No allowance for farming of transgenic animals
- Documented complaints response protocol that includes at a minimum a register of complaints and appropriate responses
- Percentage of employees trained in health and safety practices, procedures and policies relevant to the job. Safety equipment provided and maintained and in use. Evidence that all farm employees have been trained and fully understand the training
- Percentage of health and safety related accidents and violations recorded and mitigated through corrective actions
- Ability of employees to associate, bargain collectively or have access to representatives chosen by workers without management interference
- The percentage of employees who are paid fair and decent wages
- Number of incidences of discrimination

Across all seven dialogues, the indicators most often repeated involve maintaining energy consumption records, the disallowance of raising transgenic animals, as well as several fair labor type indicators including health and safety, collective bargaining, fair wages, lack of discrimination, and protocol for complaints. Any future aquaculture dialogues should adopt these indicators to maintain alignment between dialogues.

Indicators shared by 5-6 of the dialogues

- Compliance with all local/national laws
- FishSource score for the fishery(ies) from which all marine raw material in feed is derived
- >95% of fish meal and fish oil component in feed originating from fisheries deemed sustainable by an ISEAL compliant certification scheme for sustainable forage fisheries (+/- 5 yrs)
- Evidence that by-product feed ingredients do not come from fish species that are not IUCN red-listed.
- Best Management Practices used to reduce escapes
- Use only veterinary medicines, chemicals and biological products approved for aquaculture by relevant national authorities and not banned for food fish use in the potential importing country
- Allowance for prophylactic use of veterinary medicines (excluding vaccines) prior to any evidence of a specific disease problem
- Presence of a site-specific farm health plan that is reviewed at least annually and addresses biosecurity, veterinary health, crisis management and risk assessment
- Use of lethal predator control

- Incidences of violations or abuse of working hours and overtime laws or expectations
- Number of incidences of child labor
- Incidences of excessive or abusive disciplinary actions
- Number of incidences of forced, bonded or compulsory labor
- Employer responsibility and proof of insurance (accident/injury) for employee costs in a job-related accident or injury when not covered under national law
- Evidence of comprehensive and proactive anti-discrimination policies and practices
- Mortality of IUCN red listed species
- Maximum fish feed equivalence ration (FFER) or FFDRm or FFDRo
- Evidence of appropriate storage and/or disposal of chemical/medical/hydrocarbon wastes
- Non-indigenous species must be in commercial production locally and/or there must be no evidence of establishment or impact on adjacent ecosystems by non-indigenous culture species
- Evidence of waste reduction (reuse/recycling) programs

WWF's position is that many of these indicators should be adopted by future aquaculture dialogues in addition to the indicators listed in the first section.

Compliance with all local/national laws, for instance, is an indicator which is not explicitly stated in a couple dialogues, however, the assumption is that the producer is following the law already. In order to increase alignment across dialogues, future versions of the same dialogues may consider adding this indicator.

Another common theme in this section of indicators is that most dialogues share similar wording but one or two dialogues have different wording that addresses the same or a similar issue from a different angle. These indicators should also be considered as a template for future dialogues and include the following concepts: child labor, violations of working hours, and medical expenses paid for job-related injuries. The International Labor Organization (ILO) stands behind four principles concerning what they consider fundamental rights, including

- a) freedom of association and the effective recognition of the right to collective bargaining;
- b) the elimination of all forms of forced or compulsory labour;
- c) the effective abolition of child labour; and
- d) the elimination of discrimination in respect of employment and occupation.¹

Seven of the standards include principles A and D, while the wording of principles B and C are not aligned across standards. Ensuring that all four ILO principles are clearly incorporated into each of the standards would likely strengthen the perception of the Aquaculture Stewardship Council (ASC).

One indicator seems to be an extension of another indicator that was used by all seven dialogues: evidence of anti-discrimination policy (in addition to incidences of discrimination).

Some indicators were relevant only to certain species, and should be considered for other similar species dialogues in the future. These include: FishSource score for feed, ISEAL compliant feed source for marine sourced feed, no IUCN species killed as a by-product of feed sourcing, best management practices utilized to reduce escapes, use of lethal predator control, mortality of IUCN red listed species (predator control), maximum FFER/FFDR, and use of approved/non-banned medicines/chemicals.

The remaining concepts in this section were important to the majority of the dialogues, and should be considered as possible template indicators for future dialogues as well as possible amendments to the dialogues in which they were not included. These include: incidences of excessive disciplinary action, incidences of forced labor, evidence of waste reduction programs, non-indigenous species in local production or evidence of no impact to adjacent ecosystems, presence of a site-specific health plan, use of prophylactic medication, and appropriate storage/disposal of chemical/medical wastes.

¹ ILO Declaration on fundamental principles and rights at work. 86th Session, Geneva, June 1998. <http://www.ilo.org/public/english/standards/relm/ilc/ilc86/com-dtxt.htm>

Indicators shared by all freshwater (+/- Salmon) dialogues

- Compliance with tax laws
- Compliance with water discharge regulations
- Compliance with local and national land and water use regulations
- Wetland conversion limitation
- Presence of a treatment plan, treatment record book and farm health history that includes a detailed recording of all treatments and all health events on the farm

These indicators were shared by all three freshwater aquaculture dialogues and were also included in the Salmon dialogues at times, and therefore should be considered in all future freshwater dialogues to maintain alignment across freshwater aquaculture certification. I assume that compliance with tax laws, land and water use laws, and water discharge regulations is implied in the other dialogues' indicator "compliance with all local/national laws". The fact that conversion of natural ecosystem is not explicitly covered in any of the marine species seems like an oversight. Similarly, I would expect to see more veterinary health record indicators for the marine species.

Indicators shared by all marine (+/- Salmon)

There were no indicators that were shared by all 4 marine species, and this is probably largely due to the fact that shrimp, bivalves, abalone, and/or salmon are not particularly morphologically similar. As marine species are added to the dialogues, attention should be given to ensure that they share indicators where possible and/or applicable to maintain alignment across marine aquaculture certification.

<ul style="list-style-type: none"> • Compliance with all labor laws and regulations • Allowance for siting within protected areas • Amount of phosphorus released from the culture system per ton of fish or shrimp produced • Amount of nitrogen released from the culture system per ton of shrimp/annual median concentration of total ammonia nitrogen in effluent or receiving water beyond mixing zone • Percentage change in diurnal dissolved oxygen (DO) relative to DO at saturation in receiving water body for the water's specific salinity and temperature • Demonstration of chain of custody and traceability for fisheries products in feed through an ISEAL accredited or ISO 65 compliant certification scheme that also incorporates the FAO Code of Conduct for Responsible Fisheries • Evidence of traceability, demonstrated by the feed producer, of feed ingredients that make up more than 1% of the feed. • Presence and evidence of a responsible sourcing policy for the feed manufacturer for feed ingredients which comply with internationally recognized moratoriums and local laws • Evidence of farm solid wastes being discharged into the natural environment/responsible waste management • Evidence of appropriate storage and/or disposal of biological waste • Social Impact Assessment 	<ul style="list-style-type: none"> • Presence of records demonstrating that fish mortalities are removed consistently on a minimum daily basis • Percentage of mortalities that are recorded, classified, and receive a post-mortem analysis (and reported if > avg). • Allowance for treating water with pesticides that are banned, restricted or identified as extremely to moderately hazardous by the Rotterdam Convention on Prior Informed Consent, the Stockholm Convention on Persistent Organic Pollutants, the World Health Organization or the European Commission. • Rights of access to public resources are maintained/restriction not without community approval • Evidence of outreach/regular communication (e.g., meeting records, newsletters, consultation with communities and indigenous groups, or membership in association with documented outreach program) • Evidence of worker access to effective, fair and confidential grievance procedures/corrective action plan • Evidence of non-abusive disciplinary policies and procedures whose aim is to improve the worker's performance • Transparency requirements for use of GM ingredients
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These indicators were applied half of the time which is an indication that they should be considered for utilization where applicable in future dialogues, to maintain continuity across dialogues. In addition, the fact that the other half of the dialogues did not adopt such indicators, whether because the issue simply didn't arise for discussion, or because the

indicator was deemed irrelevant or too controversial, is likely to become a point of criticism in the public eye. Therefore, in order to increase alignment across dialogues and decrease the public's ability to criticize ASC's standards, some of these indicators should be considered for adoption into current dialogues as amendments. Suggestions for inclusion across all dialogues include: allowance for siting within protected areas; social impact assessment; waste management/disposal; released nitrogen, phosphorus, and dissolved oxygen into receiving waters (where applicable); responsible non-marine feed sourcing; pesticide use; community access to public resources; regular outreach/communication; transparency in wage-setting; and non-abusive discipline aimed to improve worker's performance. Finally, the omission of a stance on GM used in feed across all standards was noted, and as a controversial subject, is likely to be noted by others. Transparency on this subject should probably be a goal across dialogues, at the very least.

Transparency

AD	Code	Indicator
ShAD	1.1.2	Government issued operational permits and licenses are publicly available
ShAD, SAD, FTAD	7.4.2, 4.4.3, 5.4.3-4	Transparency requirements for use of GM ingredients (ShAD: database for consumers on ASC website, mandatory claim on label, transparent audits accessible to buyers) (FTAD: Disclosure by the feed supplier of any ingredients that contain more than 0.9% transgenic plant material. Disclosure by the farm to the direct purchasers of its harvested fish of any feed ingredients that have contained more than 0.9% genetically modified material)
ShAD	3.2.1	Farm owners shall draft and apply a verifiable conflict resolution policy for local communities. The policy shall state how conflicts and complaints will be tracked transparently, how third party mediation can be part of the process, and explain how to respond to all received complaints. Complaint boxes, complaint registers, and complaint acknowledgement receipts (in local language(s)) are used.
PAD	6.4.2	Availability of records of the source, size and quality of the seed stocked.
SAD	3.4.4	Estimated unexplained loss of farmed salmon is made publicly available
ShAD	7.7.1	Information available on energy consumption by source
SAD	7.1.3	Evidence that the farm has posted visible notice at the farm during times of therapeutic treatments and has, as part of consultation with communities under 7.1.1, communicated about potential negative health impacts from treatments.
SAD	2.5.5	Evidence that information about any lethal incidents on the farm has been made easily publicly accessible
SAD	Appendix 6	Transparency of farm-level performance data (see appendix VI for more detail)

The importance of being transparent with the public has been recognized by several of the standards, particularly the shrimp and salmon dialogues. As mentioned above, three of the dialogues include a transparency requirement regarding GM ingredients used in food, and this indicator should be considered for adoption in other and future dialogues because of consumers' concern with the topic. Making farm information available as public data may be over-burdensome for many of the smaller fish farms, thus it makes sense that transparency issues mainly arise in situations where larger ventures are involved.

