

Reality Check: Aquaculture Stewardship Council Shrimp Standard

Aquaculture Stewardship Council certification is recognised as a leading certification for farmed seafood because it offers strict policies on environmental impacts and anti-biotic usage, best in class social and community standards and unprecedented transparency through an open stakeholder process.

Recent attacks on the ASC shrimp standards are misleading. The objectionable practices described by special interest groups are strictly prohibited on ASC certified shrimp farms. Consumers can trust that prawns with the ASC logo are produced according to high standards, as only farms who comply with all 103 requirements of the standard can receive ASC certification.

We agree that shrimp farming has had major environmental and social impacts and that these impacts must be minimised. However, we have a different opinion regarding the important role of the aquaculture industry in producing food to feed the world's growing population. The ASC Shrimp Standard addresses the key impacts associated with the industry. By meeting the indicators in the standard and providing transparency on how they perform, shrimp farms can responsibly help to meet the demand for seafood.

The ASC certification programme is a tool that seeks to use market forces to drive improvements in farm production. The ASC, like all certification programmes, is complementary to other initiatives that seek to influence or promote policy change or that seek to redress injustice through national and international legal systems.

The ASC shrimp standard was established through shrimp dialogues with more than 400 participants, and is an important step in the transformation of the industry towards sustainability. The programme provides a means to measurably improve the environmental and social performance of shrimp aquaculture by directly addressing the considerable, often unintentional adverse impacts associated with farming through measures that lead to:

- A cleaner seabed: less chemicals and surplus nutrients from feed and excrement which disrupt the flora and fauna in the area surrounding farms.
- Use of anti-biotics: shrimp farms cannot use anti-biotics critically important for combatting illness in people
- Cleaner water within and around the farm: less use of chemicals, such as antibiotics and pesticides.
- Feed: the ASC is currently creating a new feed standard that will reduce the pressure on world fishing.
- Traceability: consumers know exactly where a product carrying the ASC logo originated due to clear guidelines on processing and separation of stock
- Improved social responsibility: the social rights and safety of the people who work on the farms and live in the local community are safeguarded within the ASC standard. No child labour is permitted, and freedom of association is inherent to the standard. The ASC shrimp standard is the most comprehensive and complete standard in terms of serving the

interests of workers at the farm level. 47 out of the 103 requirements cover social issues.

The ASC Shrimp Standard was specifically developed in a transparent, multi-stakeholders process. The standard development process adheres to ISEAL's Code of Good Practice for Setting Social and Environmental Standards.

The standard is audited through an on-farm visit by independent and qualified certification bodies through a completely open process. Public comment and community feedback is actively solicited during the audit and the audit reports from all certifications are publicly available.

Importantly, the ASC is committed to continuous improvements that will strengthen the standards and performance of the programme over time.

Changing the industry will take many years and will require ongoing input from experts in multiple areas, including academics, researchers, NGO, and the industry. Accountability, transparency and engagements are at the core of the ASC process and we invite everyone who shares our goal of creating a more sustainable aquaculture industry to join our efforts.

Reality v Fiction: The ASC Shrimp Standard

The charges the Naturskyddsforeningen has made against the ASC may, in some cases, apply to the broader shrimp farming industry. However, they are NOT applicable to farms that have earned ASC certification. Below, we have provided responses to their recent criticisms.

Criticism on Principle 1: The reference to the national law is weak. Often quality of national regulations is lacking as well as enforcement.

Reality: As a basic starting point, any farm seeking ASC certification must comply with national and local laws and be legal in the region where it operates.

The ASC is a global certification program, and where necessary in subsequent principles, the ASC Shrimp Standard goes beyond the minimum legal requirements to produce a more rigorous standard. However, it would be inappropriate for the ASC to evaluate the quality or rigor of the legislative system of the country or region of production.

Criticism on Principle 2: Generally it is good that there is an ask for a BEIA, though it is not clear whether there is enough qualified personnel in some countries and what should be included in the analysis.

Reality: Within the ASC Shrimp Standard, an outline for the B-EIA is given in Appendix 1 (p.113-123). Within this comprehensive appendix, guidance is given on qualification of the assessment team, the methodology to be used (including the specific issues that have to be addressed) and guidance on auditing the performed B-EIA.

Criticism on Principle 2 (continued:) Siting of shrimp farms is allowed in wetlands and tidal zones negatively impacting local communities.

Reality: This charge is also inaccurate. According to indicator 2.2.2 of the ASC Shrimp Standard, farms are not allowed (with or without a permit) to be constructed in mangrove ecosystems, natural wetlands or areas of ecological importance as determined by the B-EIA, after May 1999 (date of Ramsar Resolution VII.1).

For farms built or permitted before May 1999, farmers are required to compensate/offset impacts via rehabilitation as determined by the B-EIA, or the national/state/local authority plans/list, or 50% of the affected ecosystem (whichever is greater).

Criticism on Principle 2 (continued): The performance indicators ask for mangrove replanting, though unclear if that is really happening

Reality: The ASC standard on this is clear. It is the task of the auditor to verify the replanting of mangroves. This is defined in the ASC Shrimp Audit Manual, indicators 2.2.2.B and 2.2.2.C. If a farm does not replant the required area of mangrove forest, it would lead to a major non-conformity, which halts certification.

Criticism on Principle 3: Good that there is an ask for a p-SIA, but again not clear whether there is enough qualified personnel and no qualifications specified.

Reality: This charge is untrue. Within the ASC Shrimp Standard, an outline for the p-SIA is given in Appendix 2 on p.124-144. Within this appendix, required qualifications are given regarding the assessment team, the methodology to be used — including the specific issues that have to be addressed — and auditing guidance on the performed p-SIA.

Criticism on Principle 3 (continued): Local communities did provide input to the development of the standard (back in 2011), though their voice wasn't heard in the final version of what is known as the ASC shrimp standard

Reality: This characterisation is misleading. The development of the shrimp standard pre-dates the existence of the ASC. However, we understand that the final standard reflected an unprecedented number of consultations with the local communities, researchers, and the industry. Although not every suggestion made it fully into the final standard, the result of the years of work is a best in class standard that has accepted globally.

It is also important to note that no standard is perfect. ASC has committed to evolving all of their standards over time; more feedback will be actively solicited and may be reflected in the next version.

ASC invites Naturskyddsföreningen and their partner organisations in producing countries, as well as any other stakeholder, to use the opportunity to further improve the requirements and the standard.

Criticism on Principle 4: The requirements on social issues are based on ILO which is OK, but they only apply to people with a contract (but not the ones without a contract).

Reality: This criticism does not apply to ASC certified farms. Under Indicator 4.1.1 and 4.2.1, ASC certification requires that all farms have signed (and understood) contracts of all their employees. Workers without a contract are not allowed; this also applies to sub-contracted workers.

Criticism on Principle 4 (continued): Child labour is possible under the standard, because the requirements only apply to persons with a contract.

Reality: This is strictly not the case. No child labour is allowed under ASC certification as 1) all farms must comply with all local and regional laws including those against child labour and; 2) in regions where there may be no specific laws on this matter, ASC standards set ILO guidelines as a minimum working age.

Criticism on Principle 4 (continued): The requirements do not apply to people working in shrimp factories and the people fishing for broodstock etc.

Response ASC: The ASC Farm Standards are just that — farm standards. This charge is correct, as the standard is focused on the social practices on the farm.

Criticism on Principle 5: Antibiotics can be used and there are no requirements on the frequency of use of anti-biotics:

Reality: This is not correct. Indicator 5.3.1 of the ASC Shrimp Standard clearly stipulates that no antibiotics can be used on any ASC-labelled shrimp. If the farm needs to use antibiotics for disease treatment, then these shrimp can no longer be sold as ASC certified and would not be permitted to carry the ASC logo.

Importantly, the starting point in the standard is the prevention of diseases by applying best management practices, such as using post larvae without diseases. The standard prescribes the use of alternative disease prevention measures before medicinal treatments.

Criticism on Principle 5 (continued): Rotenon (pesticide) and Chlorine can be used to kill fish in the pond

Reality: This is correct. Under the ASC Standard, appropriate measures to protect the health of consumers and the environment are taken in the unusual cases when these chemicals must be used. According to ASC Shrimp Standard indicator 5.3.5 on p.79 and p.81 Rotenon, tea-seed-cake and chlorine are lethal for fish. Therefore, the Standard requires that water treated with these pesticides must be held for the appropriate time before release to ensure that aquatic organisms in the receiving waters are not killed.

Criticism on Principle 5 (continued) and 6: The standard is vague in its wording on how to deal with predators, including IUCN red-listed species. As a result, red-listed species are killed.

Reality: This charge is superficially plausible, but is actually wrong. The ASC Shrimp Standard states under indicator 5.2.1 that no intentional lethal predator control of any protected, threatened or endangered species as defined by the International Union for Conservation of Nature (IUCN) Red List national listing processes, or other official lists, is allowed.

In addition, the standard strongly encourages the use of passive predator exclusion fences and devices that would keep predators stay away from farms without harming them.

Criticism on Principle 6: Trawling of broodstock (monodon) is allowed with its negative consequences for the ecosystem and local communities

Reality: This charge is very misleading. Larval shrimp are not 'trawled', they are most commonly caught using low impact push nets. This practice is a small, locally important industry in itself for those that typically do not have access to land. At the time of the Shrimp Dialogues in February 2011, technology did not offer enough steady supply to require 100% of P.monodon to come from farm-raised broodstock. Sourcing of fished P.monodon broodstock can only be done from within the same country, water body and/or genetic subpopulation (footnote 113 of the ASC Shrimp Standard). Phasing these requirement is an attempt to allow the responsible component of the industry to transition to better managed and disease free brood stock, without an abrupt transition that would disrupt the economic viability of local farmers.

This charge also distorts the truth about shrimp production as very little shrimp is produced with P.monodon. In South East Asia, 70-75 per cent of shrimp are Vannamei and the rest P.monodon; in South America: 99% is Vannamei.

Criticism on Principle 6 (continued): There is also critic on the 6-year transition period for the monodon larvae from closed systems.

Reality: This timeline was set to preserve the livelihood of local communities while they transition to the new system and ensure the effective adoption of improved technology. This limited period of transition will also allow enough time for commercial hatchery and domestication¹¹⁴ technology for P. monodon to become established.

Criticism on Principle 7: Also critic on the 5 years transition period for MSC certified marine ingredients.

Reality: The ASC is currently developing a Responsible Feed Standard to address the issues surrounding feed in the aquaculture industry. You can find more information about the developing standard here. We welcome input from stakeholders and would be delighted to have Naturskyddsforeningen contribute to the development of the new certification.

Criticism on Principle 7 (continued): The standard only requires monitoring for energy use and no reduction targets.

Reality: The ASC Shrimp Standard acknowledges that, at this time, there is insufficient data available for setting energy use requirements. Therefore, the ASC Shrimp Standard requires the collection of energy consumption data by audited farms to be able to set up energy requirements in the future. Our goal is to collect detailed data so we can set a feasible standard for the conversion of energy consumption and carbon emissions.

Criticism on Principle 7 (continued): critic that only ingredients that account for more than 2% have to be disclosed hence there is no full transparency

Reality: This charge is misleading. Under the ASC standards, traceability and transparency of major feed ingredients are important for ensuring the credibility of feed sourcing. To satisfy the standard, feed producers are obliged to declare all sources of fishmeal, fish oil and other major ingredients above a 2% inclusion rate during their audits.

Proprietary arguments against the full traceability and transparency of ingredients are not an acceptable argument for non-compliance, as the standards require innovations on behalf of producers and full traceability of feed ingredients to ensure the long-term sustainability of feed sources. Furthermore, the disclosure of only significant ingredients, and not the micronutrients, allows a higher probability of compliance with this standard.