

HOW NOT TO CREATE A SHRIMP STANDARD

BACKGROUND

Shrimp farming affects ALL aspects of life
in producer nations.

Agriculture, fisheries, biodiversity and
the goods and services associated with these sectors

The economic models associated with shrimp farming
are complex

THE VALUE CHAIN IN SHRIMP FARMS

1. Feed Production – Fishmeal produced primarily from “trash fish” species trawled in Chile and Peru
2. Hatcheries and Nurseries
3. The shrimp farm – THE SCOPE OF THE ASC STANDARD
4. Processing factories
5. Branding and retail
6. Consumers

INGREDIENTS OF A **SUCCESSFUL** STANDARD

(A) A rigorous standard – precise, measurable and verifiable.

(B) Practical audit requirements

(C) Minimum supply level : If there's too little of the **sustainable** product, it won't make any difference.

Matrix of certification results

	A	B	C	RESULT
1	Pass	Pass	Pass	[GOOD] The certified product is sustainable, audit-friendly and a label-based intervention coupled with consumer information will have a positive impact.
2	Pass	Pass	Fail	<p>[BAD/NEUTRAL] The product can be produced sustainably, but is far outnumbered by the unsustainable variety. As a result, producers have no reason to switch to sustainable production (which has higher production costs than the unsustainable variety and requires additional capital investment) since there is a huge existing, growing market for the unsustainable variety.*</p> <p>But large importers sourcing from both kinds of producers <i>gain</i> a lot of positive publicity by virtue of their association with even a tiny amount of sustainable produce: Importers and supermarkets can and do leverage the “sustainable” tag. As a result, they sell a lot MORE of the unsustainable stuff, creating a greater demand (pull, from the market) for the unsustainable product.</p> <p>*Is ecolabeling a desirable environmental policy measure? http://link.springer.com/article/10.1023/A:1011101604084 Impure public goods and the comparative statics of environmentally friendly consumption http://web.williams.edu/Economics/wp/kotchencompstat.pdf</p>
3	Pass	Fail	---	<p>[BAD]The standard itself is rigorous, but can't be audited effectively for a variety of reasons (time, expense, prone to corruption, lack of verifiability—the Level 4 gap in effect.)</p> <p>As a result: (a) a lot of unsustainable produce is labeled sustainable and dumped on the market and/or (b) sustainable producers don't volunteer to apply for the standard.</p>
4	Fail	Pass	---	[WORSE]The standard does not certify a sustainable product and is essentially worthless. But, the product is certified “sustainable” and enters the market. Most certification schemes fall under this category.
5	Fail	Fail	---	[WORST] Greenwash.

A-- The quality of the Standard

B-- Audit requirements

C-- Economic model

HOW **NOT** TO CREATE A SHRIMP STANDARD

Or, where the ASC lost the plot.

--Gap Analysis of process and tools

--Trends analysis

(how the standard changed over the dialogue period)

PESTICIDES AND ANTIMICROBIALS

What did the ASC want?

Less pesticide? Reduced pesticide usage? No Pesticide?
Less antibiotics? No antibiotics?

Criterion 5.3.: Disease management and treatment

INDICATOR	REQUIREMENT
5.3.1. Allowance for use of antibiotic and medicated feed on ASC-labeled products (farm can be certified but specific product receiving medicated feed will not be authorized to carry ASC label).	None
5.3.2. Allowance for the use of antibiotics categorized as critically important by the World Health Organization ⁹⁷ (WHO), even if authorized by the pertinent national authorities.	None

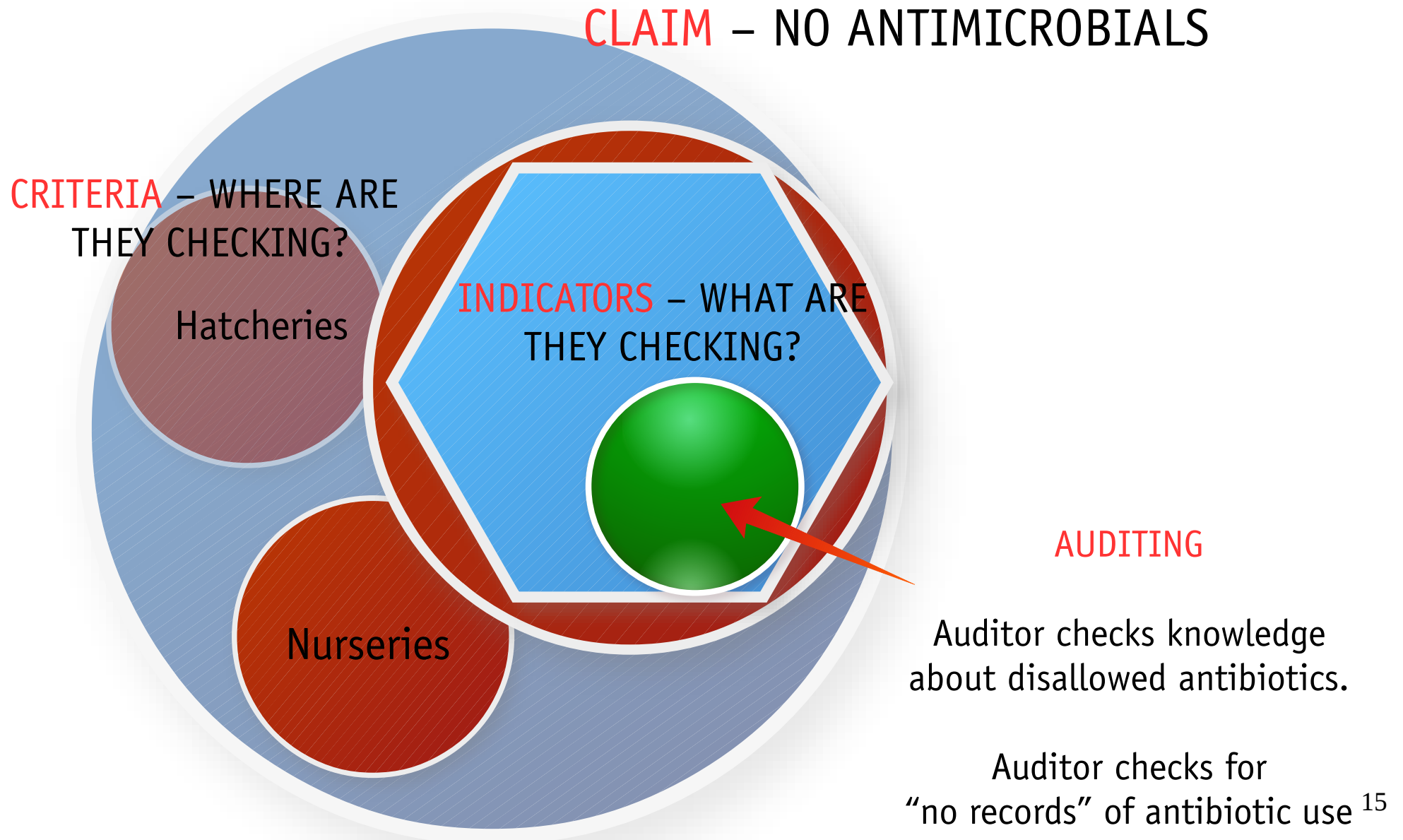
	Compliance Criteria (Required Client Actions):	Auditor Evaluation (Required CB Actions):
Indicator: Allowance for use of antibiotics and medicated feed on ASC-labeled products (farm can be certified but specific product receiving medicated feed will not be authorized to carry ASC label). Requirement: None Applicability: All	Instructions to Client on Indicator 5.3.1 This requirement applies to all antibiotics, all application methods and to both direct use and medicated feed. This indicator does not apply to hatcheries, on or off site.	
	a. Farm to prepare a list of all veterinary medicines, chemicals and biological products used on the farm in the past 12 months. For first audits, records must cover at least 1 full crop per site (see preamble).	A. Review farm's list of medicines, chemicals and biological products.
	b. Provide records detailing the use of any veterinary medicines, chemicals and biological products on each enclosure in the farm in the last 12 months. For first audits, records must cover at least 1 full crop per site (see preamble).	B. Review records to confirm farm usage of products. During on-site inspection, verify there is no evidence for unrecorded use of any veterinary medicines, chemicals or biological products (i.e. no empty containers or non-inventoried warehouse supplies).
	c. If any antibiotics or medicated feed is used, detail and maintain a traceability system to ensure that no treated product is sold as ASC labeled. In these cases farm needs to hold a valid ASC Chain of Custody Certification.	C. Capture sufficient evidence that an organization operates an accurate traceability system. If farm uses/used any antibiotics or medicated feed is used, check validity of farm's Chain of Custody.

EVIDENCE OF NO EVIDENCE?



D. During on-site visits, verify there is no evidence of use of antibiotics critical for human medicine through direct observation and inspection.

GAP ANALYSIS



The proper tool for antimicrobial
and pesticide regulation is:

TESTING

The ASC auditors do not test samples
for pesticides or antimicrobials.

ONE SIMPLE SOLUTION

NO ANTIMICROBIALS



Random sample tested by
independent laboratory.

no. of samples >> accuracy

RESULTS

THE ASC cannot tell you whether certified farms have used antimicrobials or pesticides.

Since they have explicitly ALLOWED usage in hatcheries,
we should assume that
ASC-certified shrimp farms DO USE antimicrobials

TRENDS ANALYSIS

- or how the standard evolved over the years

WORKERS, WAGES and AUDITORS

Does the ASC Standard improve worker's conditions?

In **GSC-V1:39**, the term “**employee**” was defined as:

“a person who enters an agreement, which may be formal or informal, with an enterprise to work for the enterprise in return for remuneration in cash or in kind.”

The term was removed from most criteria and indicators in **ASC-V1**. The new definition in **ASC-V1:55** added that the word “employees” would mean “**hired workers**”:

*Employee(**Hired worker**): An employee is a person who enters an agreement, which may be formal or informal, with an enterprise to work for the enterprise in return for remuneration in cash or in kind. In this standard referred to as ‘hired worker’.*

In **ASC-V1:60**, "**hired workers**" were "**permanent workers**" only if their contract **exceeded 12 months**.

ASC-V1:52 explicitly defined the difference between "**hired labour**" and "**permanent hired labour**" as follows:

"Hired labor, for specific short activities with the maximum duration of two weeks, such as harvesting, is not considered permanent hired labor."

If this wasn't confusing enough, the standard also defines a second category of short-duration employment: the temporary worker.

ASC-V1:36 defined a "**temporary worker**" as one

"whose main job is [in the capacity of] an occasional, casual or seasonal worker; daily workers, works seasonal [sic.] or temporary under contract with duration of less than 12 months. In case of re-hiring the same worker: if the total of the two hiring periods, irrespective of the time between hiring periods, goes beyond 12 months total (including, if any, probation periods), then the worker is a permanent one."

The ASC worker


To sum up, the ASC defines 5 categories of workers:

- **A permanent worker** is one who has a contract of "unlimited duration!" Only "permanent workers" are guaranteed a "fair" wage. A small-scale farm can have a maximum of *one* permanent worker.
- Those with a year-long contracts *and* a stake in the sales of the product are **hired workers** or **employees**
- **Hired labour** is a distinct category with a maximum contract duration of two weeks.
- **Temporary workers** are those hired on short-duration contracts, but have not worked for more than a year, cumulatively, on the farm,
- **Young workers** are any worker over the age of a child (14 or 15) and under the age of 18
- The word **WORKER** is not defined.

CRITERION	Perm. Worker	Hired Worker	Temp. worker	Hired labour	Not specified	WORKER (Undefined)
4.7.2 Documented disciplinary policy						*
4.7.3 Prohibition of harassment					*	
4.8.1 Defined work hours						*
4.8.2 Right to leave the farm after hours		*				
4.8.3 Minimum time-off					*	
4.8.4 Lift to nearest public transport						*
4.8.5 Overtime Compensation					*	
4.8.6 Voluntary overtime					*	
4.8.7 Maternity Leave					*	
4.9.1 Allowance for labour-only contracts					*	
4.9.2 Appropriate work permits						*
4.9.3 Written contract agreements						*
4.9.4 Probation period					*	
4.9.5 Sub contracting					*	
4.10.1 Access to managers						*
4.10.2 Complaints redressal						*
4.10.3 Complaints redressal plan					*	
4.10.4 Complaints redressal efficiency					*	
4.11.1 Safe and decent living conditions						*
4.11.2 Facilities for women					*	

CRITERION	Perm. Worker	Hired Worker	Temp. worker	Hired labour	Not specified	WORKER (Undefined)
4.1.1 Minimum age, 18		*				
4.2.1 Right to full payment		*				
4.2.2 Right to keep identity documents		*				
4.2.3 Freedom of movement		*				
4.3.1 Anti discrimination policy						*
4.3.3 Equal Pay		*				
4.3.4 Maternity benefit and marital rights					*	
4.4.1 Health and safety training						*
4.4.3 Medical expenses						*
4.5.1 Minimum wage “as applicable”		*	*			
4.5.2 “Fair” wage with increments	*					
4.5.3 No withholding of salary						*
4.5.4 Mechanism of wage-settings known						*
4.5.5 Prohibition of revolving labour					*	
4.6.1 Freedom of association						*
4.6.2 Non discrimination						*
4.7.1 Fairness of disciplinary measures					*	

certification.



A small-scale farm is defined as the local decision-making authority, has a maximum of one full-time permanent hired worker, and a maximum of five ponds but a total production area of no larger than five hectares.

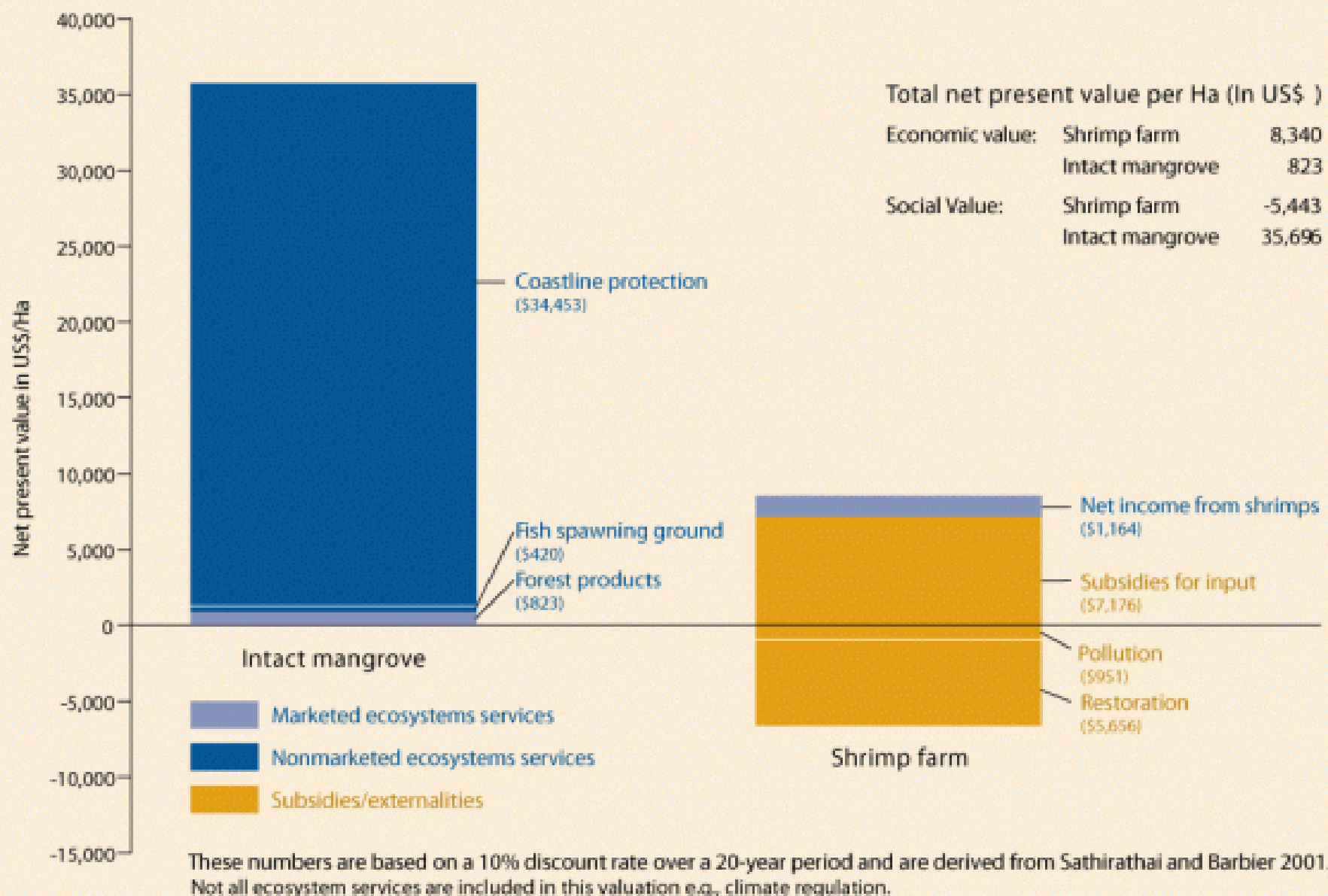
5ha = **MAXIMUM** of **ONE FULL-TIME
PERMANENT HIRED WORKER**

Most of the employment on a shrimp farm large or small is temporary work.

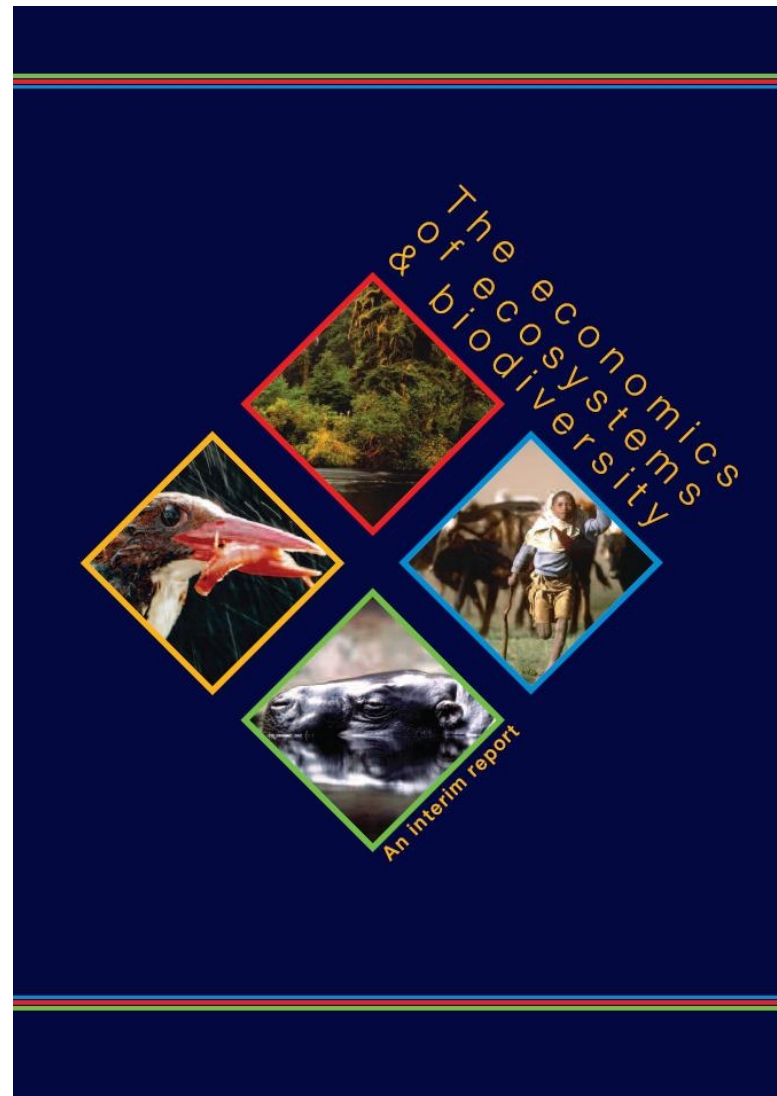
THE LOCATION OF A SHRIMP FARM

Does the ASC Standard improve or promote environmental performance?

Comparing the Economic and Social Value of Mangroves and Shrimp Farms



Source: Ranganathan, J., C. Raudsepp-Hearne, N. Lucas, F. Irwin, M. Zurek, K. Bennett, N. Ash, and P. West. 2008. Ecosystem Services: A Guide for Decision Makers. Washington, DC: World Resources Institute..



<http://www.teebweb.org/>

LOCATION OF A SHRIMP FARM

What did the ASC want?

Protect the intertidal ecosystem?
Promote sustainable shrimp farming?

LOOKING AT **TRENDS** OVER 5 YEARS

WHERE?

Criterion	Indicator	Standards (Existing Farms)	Standards (New/Expanding Farms)
2.1.1	Allowance for siting in National Protected Areas (PAs)	None, except for those with IUCN PA category V or VI	None, except for those with IUCN PA category V or VI
2.1.2	<i>Allowance for siting in mangrove ecosystems</i>	<i>None</i> , except in areas needed for pumping stations and canals with appropriate offsetting via restoration of 100% of equivalent area.	<i>None</i> , except in areas needed for pumping stations and canals with appropriate offsetting via restoration of 100% of equivalent area.
2.1.3	Allowance for siting in natural wetlands.	<i>None</i> , except in areas needed for pumping stations and canals with appropriate offsetting via restoration of 100% of equivalent area.	<i>None</i> , except in areas needed for pumping stations and canals with appropriate offsetting via restoration of 100% of equivalent area.

GSC-Version 1

WHERE?

Criterion	Indicator	Standard
2.2.2	<i>Allowance</i> for siting in mangrove ecosystems, and other natural wetlands of ecological importance <i>as determined by the BEIA</i> .	None for ponds built/ permitted after May 1999, except for pumping stations and inlet/outlet canals provided an equivalent area is rehabilitated as compensation. For ponds built/ permitted before May 1999, farmers are required to compensate/offset impacts as determined by the BEIA.

GSC-Version 2

WHERE, FINALLY?

This is what the final draft (**ASC-V1:27**) has to say about siting in mangrove ecosystems:

Criterion	Indicator	Standard
2.2.2	Allowance for siting in mangrove ecosystems, and other natural wetlands of ecological importance as determined by the BEIA or national/state/local authority plans/list	None for farms built after May 1999, except for pumping stations and inlet/outlet canals provided they have been permitted by authorities and an equivalent area is rehabilitated as compensation. 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).

ASC-Version 1 (The current version)

A DIGRESSION

what were they doing?

Table 3 – Dates and locations of GSC meetings

#	DATE	LOCATION	DAYS
1	April 2009	Brussels, Belgium	2
2	June 2009	Paris, France	3
3	September 2009	Paris, France	3
4	November 2009	Bangkok, Thailand	3
5	February 2010	Paris, France	3
6	March 2010	Jakarta, Indonesia	1
7	June 2010	Washington (DC), USA	3
8	September 2010	Paris, France	4
9	February 2011	Vancouver, Canada	1
10	February 2011	Amsterdam, Netherlands	3
11	April-November 2013	series of 15 tele- meetings of 2 hours each	



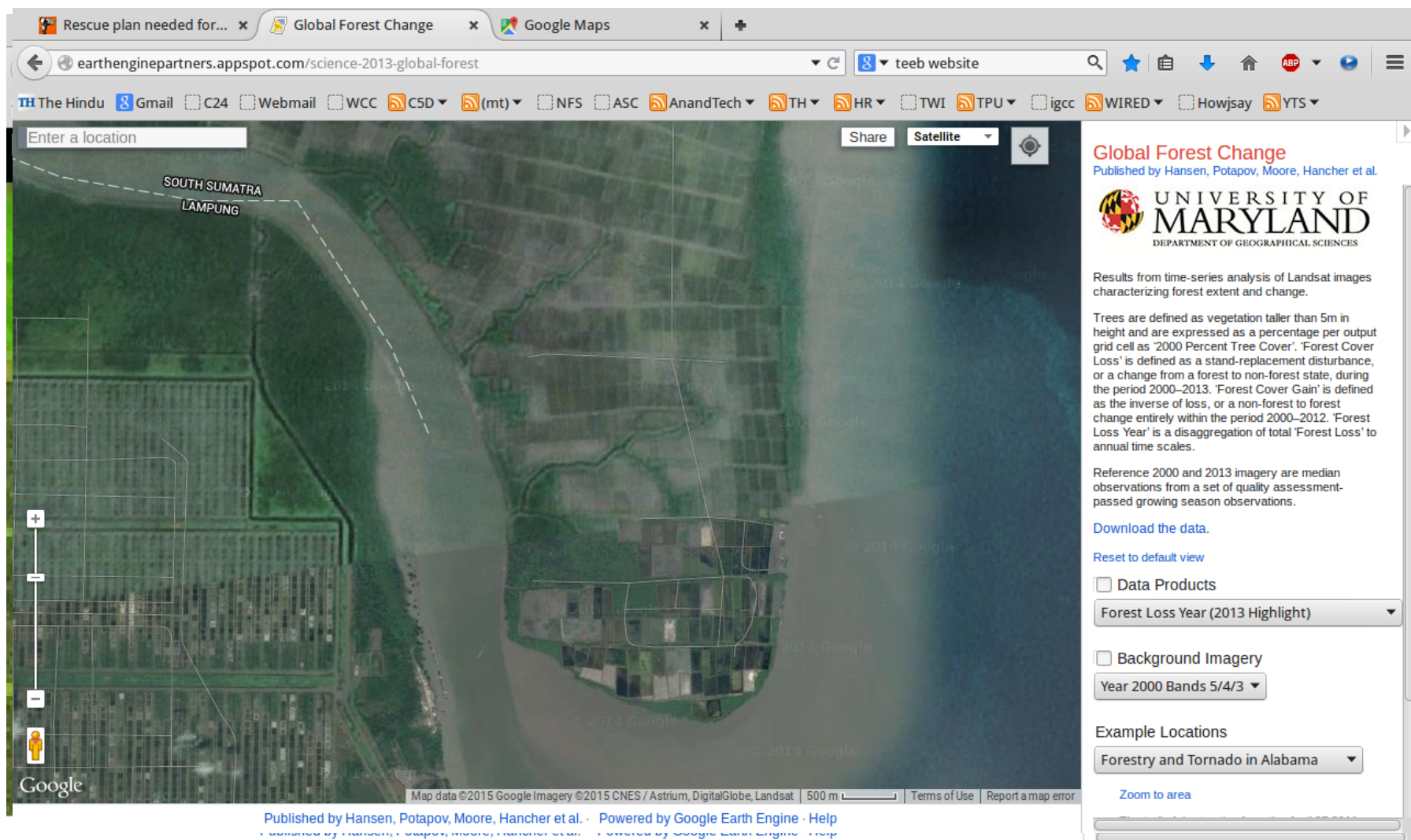
A DIGRESSION

who were they?

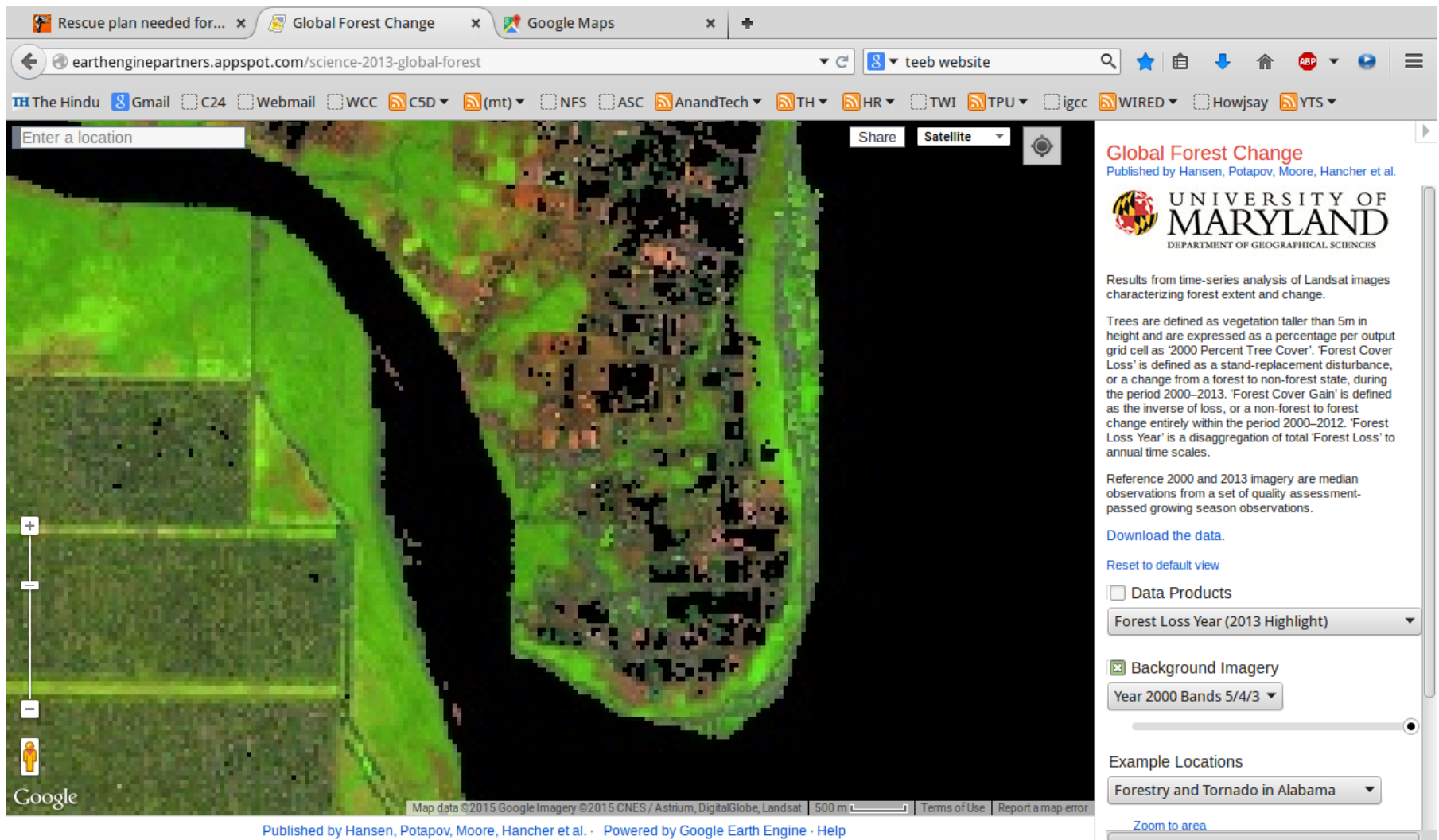
Table 1 – Names and affiliations of GSC members

	NAME	ORGANIZATION	SECTOR	COUNTRY
1	Eric Benard	OSO, R&O Seafood Gastronomy	Producer & distributor	Madagascar
2	Pete Bridson	Monterey Bay Aquarium	NGO	USA
3	Flavio Corsin / Pham Anh Tuan ⁷	ICAFIS / MARD	Producer / Government	Vietnam
4	Laurent Galloux	Bureau VERITAS	Certification	France
5	Dominique Gautier	Aqua Star	Distributor	UK
6	Marc Le Groumellec	Groupe UNIMA	Producer	Madagascar
7	Alvin Henderson	Belize Shrimp Growers Association	Producer	Belize
8	Teresa Ish	Fish Choice	NGO	USA
9	S. Jahangir Hasan Masum	Coastal Development Partnership (CDP)	NGO	Bangladesh
10	Ernesto Jack Morales	Sustainable Fisheries Partnership	NGO	Philippines
11	Sian Morgan	FishWise	NGO	USA
12	Leo van Mulekom	OXFAM Novib	NGO	Netherlands
13	Mathem Parr	IUCN NL	NGO	Netherlands
14	Jose Villalon	World Wildlife Fund USA	NGO	USA
Coordination team				
	Merrick Hoben	Consensus Building		USA
	Corey Peet	Coordinator		Canada

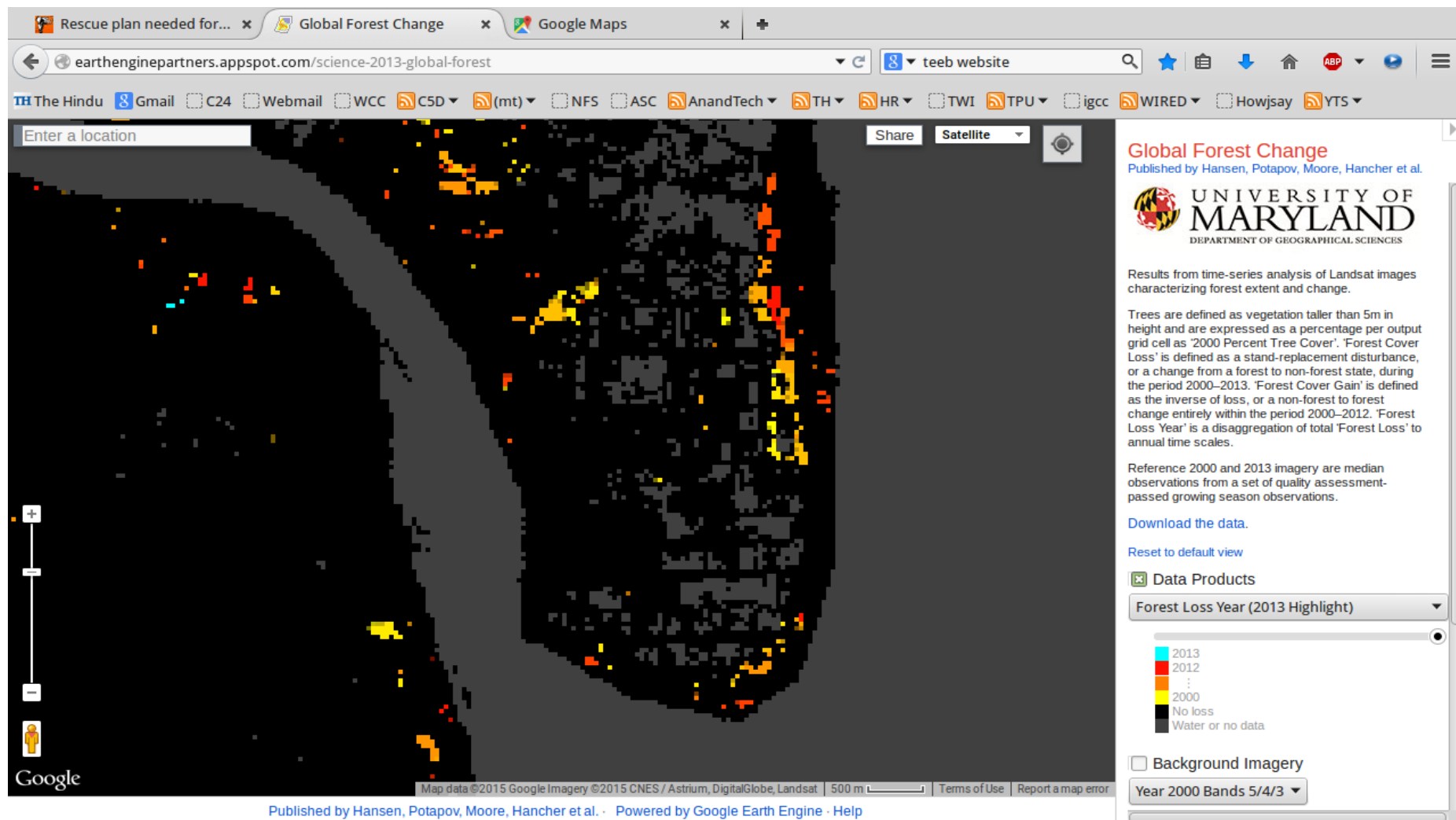
WHERE, FINALLY, in 2014?



In 2000 (post cutoff) Landsat.

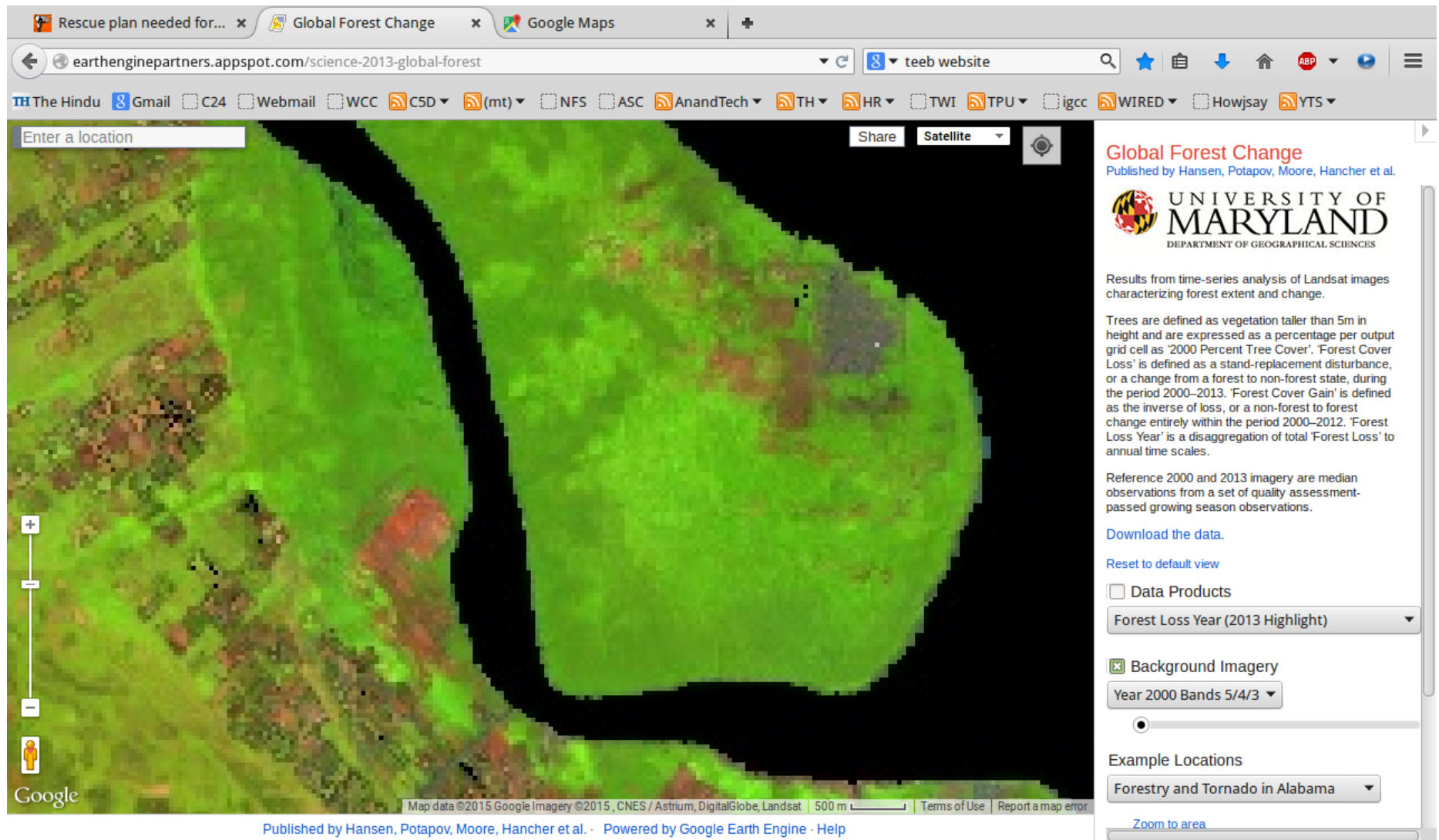


MANGROVE FELLING IN CERTIFIED FARM



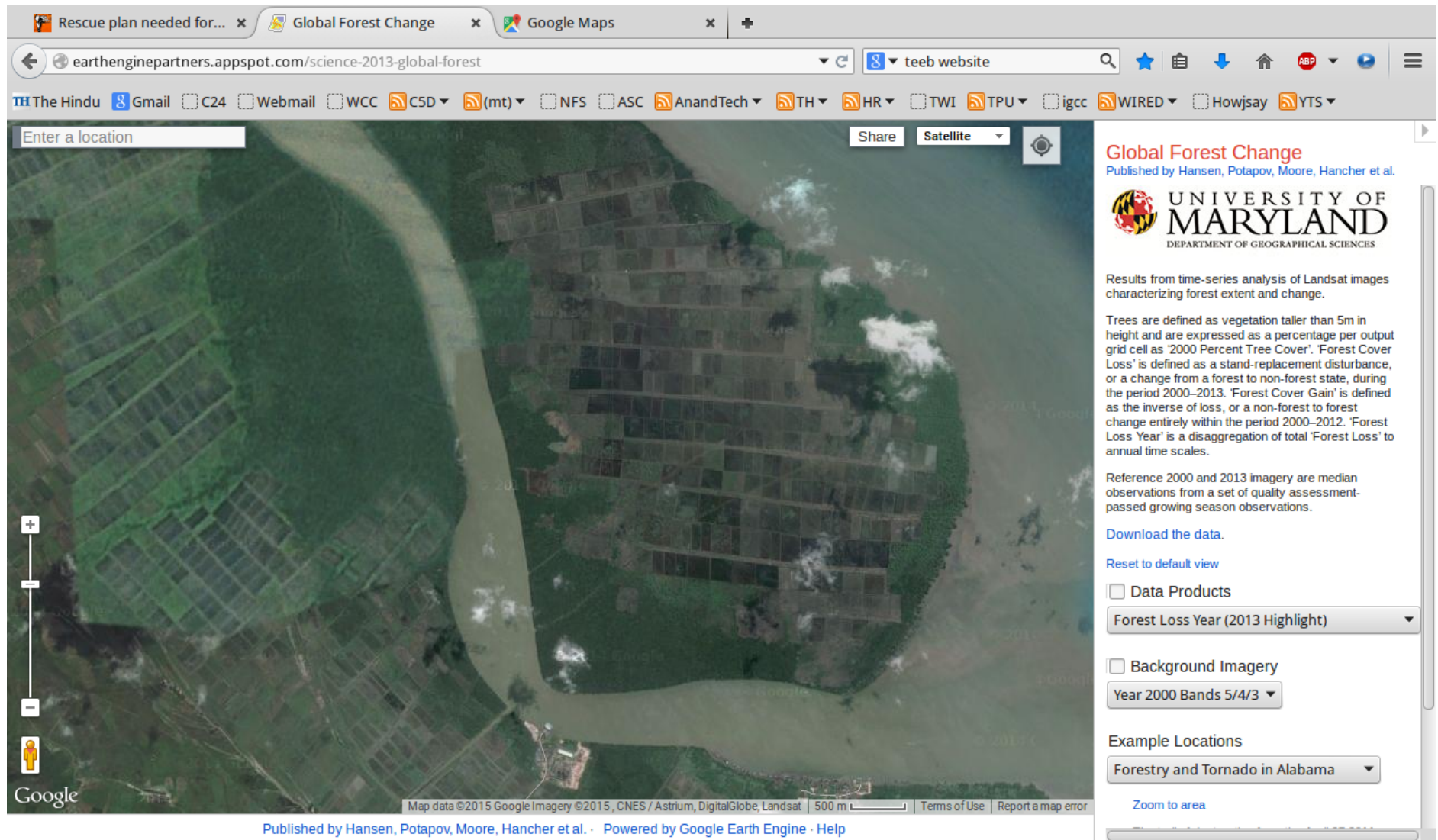
MANGROVE FELLING

(same buyer, 15 km. south)



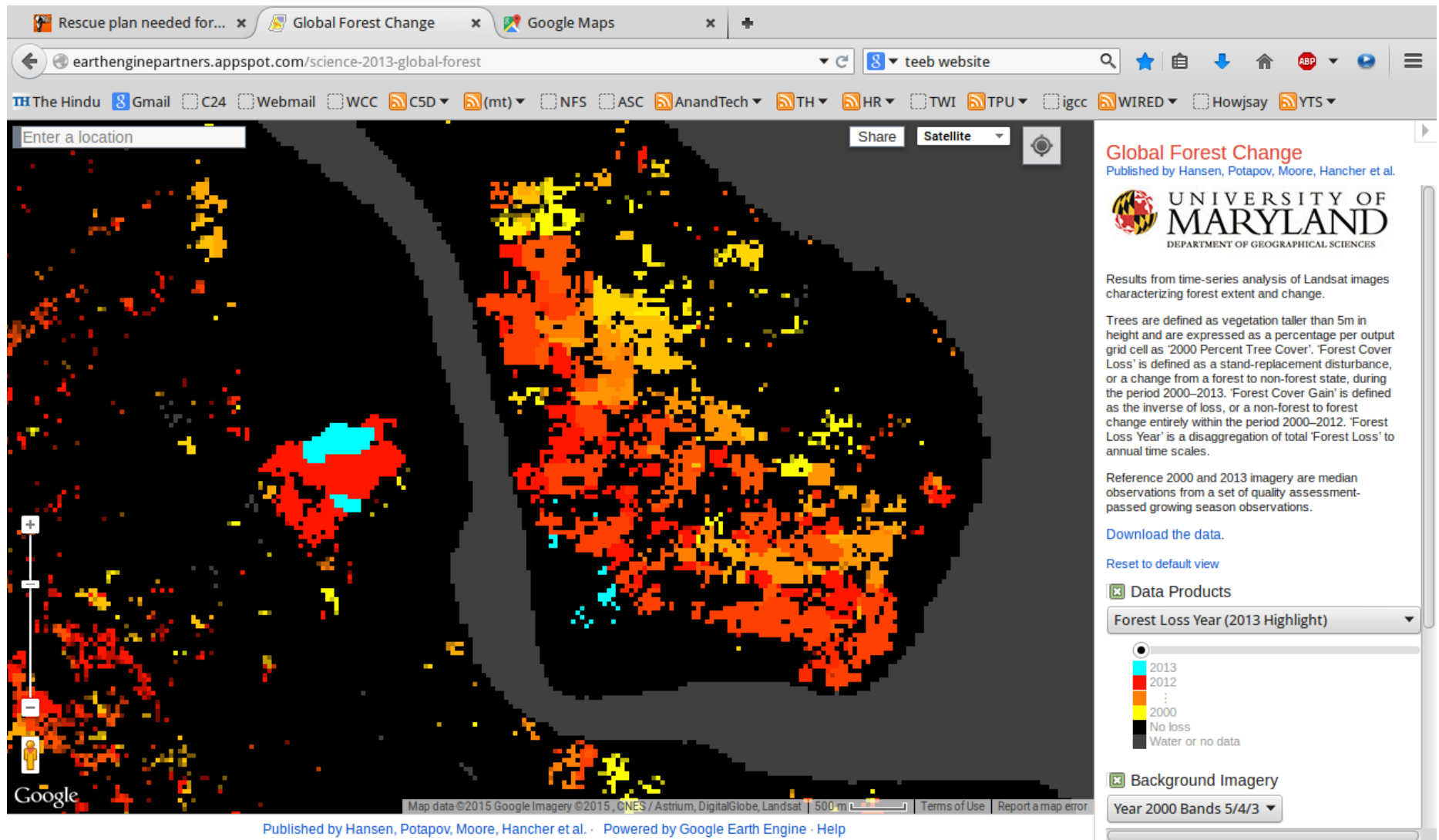
MANGROVE FELLING

(same buyer, 15 km. south)



MANGROVE FELLING

(same buyer, 15 km. south)



KEY FINDINGS

THE AS SHRIMP STANDARD DOCUMENT IS **WEAK**

THE AUDIT QUALITY IS **BAD**

- Many avoidable mistakes (minor concern)
- INACCURACIES resulting from poorly designed protocols (MAJOR concern)

ASC CERTIFIED FARMS:

NOT SUSTAINABLE

NOT MOVING TOWARDS SUSTAINABILITY

ASC CERTIFIED FARMS ARE
NOT MOVING TOWARDS SUSTAINABILITY

MOVING FORWARD

TRACKING THE ASC AUDITS

RELEASING THIS INFORMATION TO:
CONSUMERS, PRESS, RETAIL CHAIN –

ANYONE WHO CARES ABOUT SOCIAL AND ENVIRONMENTAL
IMPACTS IS A **STAKEHOLDER**

TASKS BEING DONE

AUDITING THE AUDITS

GEOMAPPING OF ASC SITES

Data overlays in Google
that can be accessed by consumers

AUDIT PRECISION?

Rescue plan needed for... x Global Forest Change x Google Maps x ASC certified shrimp far... x

https://www.google.com/maps/d/viewer?authuser=0&hl=en&mid=z3JgfmjaDX3E.kmRW52CvY56k teeb website

The Hindu Gmail C24 Webmail WCC C5D (mt) NFS ASC AnandTech TH HR TWI TPU igcc WIRED Howjsay YTS

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ASC certified shrimp farms

ASC certified shrimp farms in Indonesia, Vietnam and Ecuador

g+ f t

☒ Vietnam – RawCoordinates

- N 08°49'050" E 104°58'694"
- N 08°49'148" E 104°58'380"
- N 08°49'198" E 104°58'504"
- N 8°49'089" E 104°58'708"
- THANH DOAN 1 FARM
- N 9°26'13.1" E 106°07'47"
- N 9°26'11.0" E 106°07'53"
- N 9°25'32.0" E 106°07'51"
- N 9°25'40.0" E 106°07'38"
- PHUC THINH FARM
- N 08°49'975" E 104°58'602"

THANH DOAN 1 FARM

description THANH DOAN SEAPRODUCTS PROCESSING & IMPORT - EXPORT JOINT STOCK COMPANY (Thadimexco) Cay Tho Village, Dat Moi Ward, Nam Can District, Ca Mau Province, Vietnam

FileName: 3_20141021_Thadimexco_Thanh Doan 1 Farm_FINAL.pdf

FileName 3_20141021_Thadimexco_Thanh Doan 1 Farm_FINAL.pdf

Map data ©2015 Google Imagery ©2015 CNES / Astrium, Cnes/Spot Image, DigitalGlobe, Landsat Terms

AUDIT PRECISION?

File Edit View Go Bookmarks Help						
1 of 74		125%				
<p>Thumbnail 1</p> <p>Thumbnail 2</p> <p>Thumbnail 3</p> <p>Thumbnail 4</p> <p>Thumbnail 5</p> <p>Thumbnail 6</p>	Applicant's farm(s):		Year of established:	1990	Number of farm's employee:	N/A
			Feed supplier(s) name:	N/A	Seedling supplier(s) name:	VU HAO, TRUNG TIN,...
			Annual production capacity:	15 tons	Crop duration:	12 months
			Water treatment system:	Extensive farming, add fingerling, no feed, no water treatment system. Discharged water is kept in good condition during whole crop		
			Other certification held:	N/A		
			Other information:	Extensive farming system, has only one pond		
II. CERTIFICATION SCOPE						
ASC Shrimp Standard version 1.0 March 2014						
Address:		#1 Site:	THANH DOAN 1 FARM		#2 Site:	N/A
		Address:	Cay Tho Village, Dat Moi Ward, Nam Can District, Ca Mau Province, Vietnam		Address:	N/A
Coordinates:		#1 Site:	A: N 08o49'089" -" E 104o58'708	B: N 08o49'050" -" E 104o58'694	C: N 08o49'148" -" E 104o58'380	D: N 08o49'198" -" E 104o58'504
		#2 Site:	N/A			
Extensive Farming - adding fingerling, no feed - of <i>penaeus monodon</i> (black tiger shrimp)						
		<i>P. monodon</i> .		Other specie(s):	NA	
Body(/ies):		CAY THO CANAL				
Stakeholder and Interested Party Input, please contact: ICC office: xaviere.lagadec@fr.bureauveritas.com Team leader: huy.nguyen@vn.bureauveritas.com						
Page 1 of 70						
CERTIFICATION Version 1.0 issued on 10-Apr-2014						
Aquaculture Stewardship Council Farm Audit Grid THANH DOAN SEAPRODUCTS PROCESSING IMPORT - EXPORT J.S. CO. (THADIMEXCO)						
Audit Grid V.25-09-2014						

AUDIT PRECISION?

Rescue plan needed for... x Global Forest Change x Google Maps x ASC certified shrimp far... x

https://www.google.com/maps/d/viewer?authuser=0&hl=en&mid=z3jgfmjaDX3E.kmRW52CvY56k teeb website

The Hindu Gmail C24 Webmail WCC CSD (mt) NFS ASC AnandTech TH HR TWI TPU igcc WIRED Howjsay YTS

+adiliwallah Search Images Maps Play YouTube Gmail Drive More - adiliwallah

ASC certified shrimp farms

ASC certified shrimp farms in Indonesia, Vietnam and Ecuador

g+ f t

- 9°09'53.36"N 105°14'45.19"E
- 9°09'56.72"N 105°14'26.29"E
- Quoc Viet Shrimp Farm
- N 16°42'041" E 104°24'014"
- N 16°43'000" E 104°24'006"
- N 16°42'053" E 104°24'037"
- N 16°43'010" E 104°24'030"
- DIEN MON FARM
- 9°51'47.6"N 106°33'43.9"E
- 9°51'03.5"N 106°34'53.8"E
- 9°51'16.3"N 106°33'36.1"E
- 9°50'37.7"N 106°34'21.9"E
- THANH PHU SHRIMP FARM

Map data ©2015 AutoNavi, Google, SK planet, ZENRIN Imagery ©2015 TerraMetrics Terms

AUDIT PRECISION?

File Edit View Go Bookmarks Help

8 of 91 150%

Thumbnails

3

4

5

6

7

8

Aquaculture Stewardship Council Farm Audit Grid
THUAN PHUOC SEAFOOD AND TRADING CORPORATION
DIEN MON FARM

Audit Grid V (23-07-2014)

of the farm (in degrees and accuracy of two decimals in the ; 22° 43,78' E using World es). The center of the than 1 hectare, corners of the	A. Verify that the geographical coordinates are available and accurate and whether the farm is established not on a PA.	C				<p>The farm map has GPS coordinates of the farm:</p> <p>A. N16o42'041" -" E104o24'014"</p> <p>B. N16o43'000" -" E104o24'006"</p> <p>C. N16o42'053" -" E104o24'037"</p> <p>D. N16o43'010" -" E104o24'030"</p> <p>Auditor verify the coordinates by locating positions of angles by the positioning device, confirm the coordinates are accurate.</p> <p>Farm is located within "Shrimp farming on-sand area of Phong Dien district", in the master plan until 2020, approved on 31-12-2009 by People Committee of Phong Dien District.</p> <p>Compared of farm location with map of IUCN's protected areas from the website https://www.ibatforbusiness.org/login; and protected areas of Viet Nam in "map of mangroves and lagoons on Vietnam Sea" based on the project KC-09 - Hanoi Institute of Oceanography; and "List of Ramsar protected areas of Vietnam" dated on 27-11-2012 at the website Ramsar.org .</p> <p>Confirm the farm is not within a PA.</p>
provide evidence of the	B. Verify that the designation is accurate and that the area was not designated as a Category I-IV PA at the time of construction/or relevant permissions were obtained at the time of construction.				NA	NA. The farm is not on a PA.
I category V, provide evidence and traditional land use and that % of the total PA area. peer-reviewed articles or	C. Verify that evidence is available and credible, and that the farm does not occupy more than 25% of the PA area. Auditors should register and consult IBAT on Conservation International website https://www.ibatforbusiness.org/login . Auditors should verify that farm location and activities are compatible with PA zoning and management plan.				NA	NA. The farm is not on a PA.

Find this: N 16°43'010" E 104°24'030"

WHO IS RESPONSIBLE?

Who checks the audit reports?

SHOW US THE **B-EIA** and **p-SIA**

(Biodiversity inclusive Environmental Impact Assessment)
(Participatory Social Impact Assessment)

WHO WILL LISTEN?

Field investigations of ASC farms (some are underway)

Create an online tool for consumers?

--Visual link **BRAND NAMES, IMPORTERS** in the EU
to

PHOTOGRAPHS, INTERVIEWS with **LOCAL COMMUNITIES**



SUPER SHRIMP!®™
SUPER SHOP!

TRANSPARENCY earns TRUST

My work with the Global Alliance and
SSNCs Scampi Working Group:

NOT merely to tell you what is happening

To **SHOW YOU** the data and evidence

YOU DECIDE WHAT TO DO

Timeo Danaos et dona ferentis

--Virgil (Aeneid, II, 49)

I fear the Greeks,
Even when they are bearing gifts

FURTHER DISCUSSION

What can consumers and retailers do **NOW**?

Thank you.

QUESTIONS and COMMENTS:
globalariaproject@gmail.com
amit@theoutsider.in