

IMO Group Office
Weststrasse 51
CH-8570 Weinfelden
Fon +41 (0) 71 626 0 626
Fax +41 (0) 71 626 0 623
info@imo.ch
www.imo.ch

control
IMO
INSTITUT FÜR MARKTÖKOLOGIE

IMO Group Office Weststrasse 51 CH-8570 Weinfelden

Wonogiri, Java
PT Aquafarm Nusantara
Regal Springs

Final Audit Report*



CAB: Institute for Marketecology (IMO)
Author: M.Stark
Date: 02.10.12

**This report is for public release and does not contain any confidential information.*

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Glossary

ASI	Accreditation Services International
CC	Certification Committee IMO
d	day(s)
IMO	Institute for Marketecology
KIB	Kim Bedford
Lead	Lead Auditor
MIS	Michèle Stark
PTAN	PT Aquafarm Nusantara
SK	Sadasivam Karthikeyan
UOC	Unit of certification
XTS	Xuan Tran Sang

1. Executive Summary

Any version of this report in any other language than English is an unverified translation, and in case of differences the English version shall take precedence.

PT Aquafarm Nusantara is an Indonesian company dedicated to integrated tilapia aquaculture. PTAN has operations on 2 islands, Sumatra and Java. There is one processing plant on each island, processing the fish of the farms of the same island. There is one farm on Sumatra and 4 farms in Java. PTAN also operates a hatchery/nursery in Sumatra, and a hatchery in central Java. Whole tilapia fish are processed in the processing plants to become frozen products for export.

All PTAN farms were audited and this report covers the assessment of Wonogiri farm only. Wonogiri is a single farm site growing Tilapia *Oreochromis Niloticus* in net cages in the artificial lake Wonogiri Reservoir situated in central Java.

Wonogiri farm site was audited against principle one to six in two days and against principle 7 on a separate third day. The audit was carried out by three auditors in English with translation.

During the environmental assessment, one major (closed prior to certification), eight minor (two closed prior to certification) and one recommendation were raised. During the social assessment, one major (closed prior to certification), three minor (not closed prior to certification) and no recommendations were raised.

Besides the grow-out, the scope of the assessment includes the harvest, landing and subcontracted transport in sealed tanks to processing. COC certification is required from the point of unloading from the sealed tanks.

IMO determines that all the requirements of the standard are sufficiently met and has certified Wonogiri farm.

2. CAB contact information

Institute for Marketecology (IMO)
Fisheries & Aquaculture
Weststr. 51
8570 Weinfelden, Switzerland

Tel: 0041-71-626 0 626 (general)

Email: aqua@imo.ch

Website: www.imo.ch

3. Background on the applicant farm

PT Aquafarm Nusantara is an Indonesian company dedicated to integrated tilapia aquaculture. PTAN has operations on 2 islands, Sumatra and Java. There is one processing plant on each island, processing the fish of the farms of the same island. There is one farm on Sumatra and 4 farms in Java. PTAN also operates a hatchery/nursery in Sumatra, and a hatchery in central Java. Whole tilapia fish are processed in the processing plants to become frozen products for export.

Wonogiri is based in the Wonogiri Reservoir on Java, and produces tilapia all year round in net cages. There are other farms within the same receiving water body.

Wonogiri is currently under assessment for GlobalG.A.P certification. No other farm certificates are held.

4. Scope

The assessment was carried out against the ASC Tilapia Standard v1.0.

The species produced at the farm is *Oreochromis Niloticus*.

Audit scope: Wonogiri farm (single site), Tilapia.

Receiving water bodies delineations: Wonogiri Reservoir situated in central Java. This is distinct from the receiving water body of the hatchery, therefore, the hatchery has been excluded from the scope.

5. Audit plan

action	locations	persons	dates*
Desk review: pre-audit data	IMO Head office	MIS	8.4-8.5 2012
Audit (principle 1-6)	Internet, calculations & document review in hotel in Solo; Farm head office Wunut Farm site Wonogiri	MIS (lead) XTS	15.05.2012 19.05.2012 21.05.2012
Audit (principle 7)	Farm site Wonogiri	SK	01.06.2012
Stakeholder & community meetings/interviews	Farm site Wonogiri	XTS	21.05.2012
Writing of the report	IMO Head office	MIS	Completed 12.06.2012
Reviewing the report	IMO Head office	KIB	Completed 26.07.2012
Client report to client	IMO Head office	KIB	26.07.2012
Updating report	IMO Head office	KIB	24.08.2012

Draft public* report to ASC	IMO Head office	KIB	04.09.2012
Stakeholder comments			10 days
Updating report	IMO Head office	KIB	02.10.2012
Certification decision	IMO Head office	KIB CC	03.10.2012
Final public report to ASC	IMO Head office	KIB	03.10.2012

* The previous versions of the report are not public.

The audit was carried out with I Wayan Mudana (production manager Java PTAN) and Anne-Laurence Huillery (sustainability officer/production coordinator Regal Springs). Other staff/workers such as Harjono (head of HR PTAN Java) from PTAN joined parts of the audit, depending on their responsibility and the criteria being assessed.

Stakeholder and community interviews were carried out with the following persons:

Name	Affiliation
Budwi	Head of RW 01 Sendang
Wiyoto	Prominent figure of Kedungareng
Budi Kristianto	Chief of Youth Organization

6. Findings

Details of the evidence of compliance found during the audit for each individual criteria of the standard can be found in Annex 1.

Any outstanding non-conformities and their respective action plans are listed under section 10. of this report. Any recommendations or closed non-conformities are not listed here and are part of Annex 1.

Community interviews further confirmed the audit findings and interviewed persons emphasized their support for this project. However, the additional jobs available due to the presence of the farm seems to be very important for the community and in future assessments more independent community members should be interviewed if possible.

All water measurements and analysis were found to be sufficiently compliant, however, repetitive measurements using the same instrument and person in the same location indicated less precision than the maximum percent error between measurements the standard is asking for. Since the instruments used are rated more than adequate and were used in a professional manner, an average of 5 sampling sets was taken and percent error between farm and auditor measurements was interpreted as compliant if within this range of variation.

Water temperatures in the lake are relatively high and additional handling of fish to determine the 100g level is not feasible. For this reason this threshold is estimated in terms

of growth days rather than measured. In addition, a modified formulae has been submitted to calculate recovery percentage.

In general, the farm under assessment was well prepared for the audit with all pre-audit data available prior to the audit. The auditors had open access to all documentation, the farm and staff/workers as required. The farm is well managed and documented and staff trained to implement the internal procedures. Efforts are made to cooperate with the local villages.

A description of the certification status can be found under section 8. of this report.

7. Evaluation results

Details of the evidence of compliance for each criteria in the standard can be found in Annex 1.

8. Decision

IMO determines that Wonogiri farm meets all the requirements of the standard and has issued a certificate for the scope defined under section 4. of this report. Any outstanding non-conformities and their respective action plans are listed under section 10. of this report.

9. Determination of the start of the COC

Risk assessment - COC within the farm

L – low risk: no such activities or a controlled system in place (e.g. license)

M – medium risk: such activities occur within the farm but there is a good system in place

H – high risk: such activities occur, there is a risk of mixing and the system in place is not sufficient

Ref to CR	Integrity of certified products	Associated risk	rationale
17.5.1	System in use	L	Robust internal traceability system and continuous documentation of lots, fish numbers and quantities produced.
17.5.1.2	The opportunity of substitution prior to or at harvesting	L	Little incentive (see 17.5.1.3) or opportunity (see 17.5.1.5) to substitute any live fish from the cages prior to or at harvesting.
17.5.1.3	The possibility of introducing product from outside the unit of certification	L	The entire farm Wonogiri as well as the other 3 farms in Java belonging to PTAN are undergoing assessment to be ASC certified. Therefore, there is no incentive and little possibility to introduce product

			from outside of the UOC. See also 17.5.1.5
17.5.1.4	Robustness of the management system	L	Robust management system (see also Annex 1)
17.5.1.5	Any transshipment activities taking place	L	The farm is situated in a lake close to the harvest/landing site. Transshipment could only happen from other farms, but none of the other farms produce the same quality (size) of tilapia.
17.5.1.6	The number and/or location of points of harvest	L	There is only one landing site used for all harvests, where fish are loaded into sealed tanks.
	Overall risk estimation	L	

If the CAB determines the system is sufficient, products can enter into further certified chains of custody and be eligible to carry the ASC Label.

Scope of aquaculture certificate, including the points of change of ownership after which COC certification is needed:

Besides the grow-out, the scope of the assessment includes the harvest, landing and subcontracted transport in sealed tanks to processing. COC certification is required from the point of unloading from the sealed tanks, even if no change in ownership occurs.

No retrospective approval has been applied for. Only products harvested as of the date of certification are approved to carry the ASC logo.

If the CAB determines the system is not sufficient, products may not enter into further certified chains of custody and are not eligible to carry the ASC Label.

The following products may not enter into further certified chains of custody and are not eligible to carry the ASC Label:

NA

This determination will remain in force until revised by the CAB in a subsequent audit.

10. Non-conformity report(s)

N° of CC	Year	Cat.	Non-conformity (summary)	Action plan	Deadline
1.1.1	2012	min	<u>Water use licence</u> No water using right is available (still waiting in Jakarta)	Since march 2011, Wonogiri management team has completed and sent the required documents to obtain the license. No feedback has been provided by the local authority (Balai Besar Wilayah Sungai Bengawan Solo). Wonogiri management	End of Sept 2012, to be verified during next audit

N° of CC	Year	Cat.	Non-conformity (summary)	Action plan	Deadline
				<p>team also attended a meeting with local authorities in feb 2012 about license, but again no feedback was provided. A letter in april 2012 from Wonogiri fisheries authorities mentionned we can continue production without expansion until we get the license from Jakarta.</p> <p>We will contact Balai Besar Wilayah Sungai Bengawan Solo to ask for another update.</p>	
1.1.2	2012	min	<p><u>Tax issues</u></p> <p>1. Source water tax: The farm has submitted the application to Jakarta to ask if they have to pay for water use license and tax.</p> <p>2. Profit tax: From 2010 till now, not yet paid due to the late calculation from the government. Need more evidence to explain why the company has not yet paid.</p>	<p>In Wonogiri we can't pay the water use tax for the moment, calculation hasn't been made by authorities (they wait for the license). We'll ask for update about this by the same time we ask about the water use license.</p> <p>At the time of audit, we couldn't settle the 2010 tax because the financial audit report wasn't finalized yet. We got the 2010 financial audit report from external auditor already, and the completed tax form was sent to authorities on July 30th. After we receive feedback from tax authorities, we shall conclude the 2010 tax issue.</p> <p>For year 2011 PTAN hasn't been audited yet, so tax report will be done in several months.</p>	End of Sept 2012, to be verified during next audit
2.5.1	2012	min	<p><u>Water sampling/measurements</u></p> <p>The handling of water measurements and water sampling may cause some inaccurate results due to the</p>	<p>SOP about water sampling will be modified to include the warning "operator's hand or any other material should not be in contact with</p>	End of Sept 2012, to be verified during next audit

N° of CC	Year	Cat.	Non-conformity (summary)	Action plan	Deadline
			<p>following reasons:</p> <ul style="list-style-type: none"> - staff did not always wait until reading was stable prior to taking result - water sample was poured over a hand held sampling bottle. Potentially contaminated water was used for the sample. 	<p>sampled water". Refresher training will be conducted for the persons in charge of water sampling, including this extra point, and also the points such as "waiting until numbers are stable to make a reading".</p>	
2.6.1	2012	min	<p><u>Wetland</u> No wetland map available showing a 5-km radius of the farm or showing pre- and post-1999 wetland coverage.</p>	<p>Many organisations have been contacted in order to get the map (WWF, Wetlands International Indonesia, Baktosurturnal the Indonesian mapping agency, Pusat Penelitian Dan Pengembangan Tanah Agroklimat, Balai Penelitian Tanah), but none of them is able to provide pre and post 1999 wetlands coverage map. The only solution we see is to place on a map the 250 wetlands sites listed by Wetlands International Indonesia, to demonstrate none of them is overlapping with our farms. For pre 1999 coverage, the information just seems impossible to get.</p> <p>Furthermore, the farm is situated in an artificial lake created in 1976 (prior to the 1999 requested target date).</p>	Next audit
5.1.2	2012	min	<p><u>Feed supplier confirmation letter</u> There is a letter from the feed supplier confirming feed values/information. However, the Aquafarm template has not been updated to the most recent update of the guidance manual.</p>	<p>We will update the template for feed suppliers' declaration to remove the "forage fisheries" wording.</p>	End of Sept 2012, to be verified during next audit
6.3.2	2012	min	<p><u>Dead fish</u> Collected every day and sent to local consumption and poultry feedmill. Dead fish record in the office is different from the daily dead</p>	<p>Distribution records of the dead fish will mention both quantities in kg and in pieces, for better accuracy.</p>	End of Sept 2012, to be verified during next audit

N° of CC	Year	Cat.	Non-conformity (summary)	Action plan	Deadline
			fish records. More evidence is needed to prove that all dead fish go to local consumption and poultry feed mill.		
7.8.1	2012	min	<u>Corrective action plan for unintended problems</u> Although procedure for complaint handling exists, the facility did not have an internal management system to verify follow-up on social issues and the internal monitoring of labor activities through works committee, internal audits and management review meetings, to ensure efficiency of corrective actions implemented.	We add in the procedure "labor-related and community-related complaints and conflicts handling procedure" the following: One management meeting is held every 6 months to review labor-related and community-related issues, and to verify that complaints have been fully addressed. Records of this meeting are maintained by the assistant manager.	End of Sept 2012, to be verified during next audit
7.8.2	2012	min	<u>Emergency program</u> It was noted from review of records, employees interview and interaction with facility management that the facility had not prepared the emergency preparedness program for natural disasters like earthquakes, storms etc.	Emergency handling procedure" will be modified to include natural disasters and to include one simulation of evacuation every 2 years. Training of the workers with the updated procedure will take place during our next health/safety/emergency annual training.	End of Sept 2012, to be verified during next audit
7.8.3	2012	min	<u>Complaints</u> No records of complaint cases, related actions and resolution maintained as well as worker evaluation of the resolution, because no complaint were raised (declaration from farm). This has to be demonstrated.	We add in the procedure "labor-related and community-related complaints and conflicts handling" the following: opening of the complaint mail box shall be done once a month by the HR manager, witnessed by a workers' representative. Records of the findings shall be maintained.	End of Sept 2012, to be verified during next audit

<i>N° of CC</i>	<i>Number of not fulfilled compliance criteria (e.g. 1.1.1). In case of doubts indicate at least chapter of report.</i>
<i>Year</i>	<i>First year when the non-conformity has been observed.</i>
<i>Cat.</i>	<i>Sanction Category: rate using rec, min or Maj</i>
<i>Non-conformity</i>	<i>Discrepancy to standard.</i>
<i>Action plan</i>	<i>Measure to correct non-conformity stated by company and to be approved by IMO. Implementation of corrective measure to be completed by deadline.</i>
<i>Deadline</i>	<i>Date when IMO will assess the implementation of the corrective measure.</i>
<i>rec</i>	<i>Recommendation (no action plan required)</i>
<i>min</i>	<i>Minor non-conformity: see Annex 2</i>
<i>Maj</i>	<i>Major non-conformity: see Annex 2</i>

11. Next scheduled audit

Next planned surveillance audit; (year, month):	2013, June
Complete re-certification every three years; at the latest (year):	2015

IMO has the right to carry out additional unannounced audits according to the IMO standard operation procedures (SOPs). Likewise, an additional audit can be carried out within the framework of a document review.

Operator's comments (optional):

The operator herewith agrees to implement the action plan/corrective measures. The final certification decision is made by the responsible certification officer at IMO.

Annexes

Annex 1a. Evaluation results P1-6

Please see separate document. The following information is confidential and has been removed from the public report:

- Water monitoring data and analysis

Annex 1b. Evaluation results P7

Please see separate document.

Annex 2. Classification of minor / major non-conformities

Minor non-conformities

a) For initial certification, the CAB may recommend the applicant for certification once an action plan to address non-conformity has been agreed to by both the client and the CAB.

i. The action plan shall include a brief description of:

A. The root cause(s) of the non-conformity

B. The corrective action(s) to be taken is intended to satisfactorily address the non-conformity

C. The timeframe for implementation of corrective action(s)

ii. Minor non-conformities may be extended once for a maximum period of one (1) year if full implementation of corrective action was not possible due to circumstances beyond the control of the client.

b) The CAB should raise a major non-conformity where minor non-conformities are repeatedly raised against a particular requirement.

c) The CAB shall require that minor non-conformities raised during surveillance audits are satisfactorily addressed in one (1) year.

Major non-conformities

a) The CAB shall require that major non-conformities shall be satisfactorily addressed by an applicant:

i. Prior to certification being granted.

ii. Within three months of the date of the audit or a full re-audit shall be required.

iii. That the root cause of the non-conformity is identified.

b) In the case of a major non-conformity raised during the period of validity of a certificate, the CAB shall require:

i. That the certificate holder satisfactorily addresses the non-conformity within a maximum of three (3) months

ii. Major non-conformities may be extended once for a maximum period of another three months if full implementation of corrective action was not possible due to circumstances beyond the control of the client

iii. That the root cause of the non-conformity is identified

Annex 3. Form 1– Request for Interpretation or Variance

This form is for the submission of requests by CABs to ASC to request interpretations of ASC normative requirements and/or requests for variance from specific normative requirements.

I CAB Request

1.1 NAME OF CAB	1.2 DATE OF SUBMISSION	1.3 CAB CONTACT PERSON	1.4 EMAIL ADDRESS OF CAB CONTACT PERSON
1.5 ASC DOCUMENT REFERENCE			
1.6 BACKGROUND (PROVIDE FULL EXPLANATION OF THE ISSUE)			
1.7 RECOMMENDED ACTION/DECISION			

II ASC Determination

2.1 STATUS	2.2 DATE OF ASC DETERMINATION
<input type="checkbox"/> Closed	
2.3 ASC DETERMINATION ON VARIANCE	
2.3 ASC INTERPRETATION	

Annex 4. Stakeholder submissions

including written or other documented information and CAB written responses to each submission.

Public consultation period	Stakeholder submission	IMO Response
Audit announcement (30 days prior to audit)	No submissions received	n/a
Draft public report (10 days from report publication)	No submissions received	n/a

	recomen- dation	minor NC	major NC	NC	action plan	deadline	action plan approved by IMO	status
1.1.1		1		<u>Water use licence</u> No water using right is available (still waiting in Jakarta)	see report	see report	ok	open
1.1.2		1		<u>Tax issues</u> The authorities come by annually to check tax payments and visit the farms to check production quantities. This inspection however is not documented, but they can apply to get a confirmation of the visit. Records at head office in Wunut. Wonogiri has to pay four kinds of tax: source water tax, worker labour tax, land and building tax, profit of company tax (for the company): 1. Source water tax: The farm has submitted the application to Jakarta to ask if they have to pay for water using license and tax. Conclusion: not compliant 2. Profit of company tax: From 2010 till now, not yet paid due to the late calculation from the government. Need more evidence to explain why the company has not yet paid. Conclusion: not compliant	see report	see report	ok	open
2.2.1		1		<u>Species statement</u> There is a government certification (regency Sragen), that tilapia (ikor nila) is established and naturally reproducing in the lake and has been present in the lake prior to before 1 January 2008. However, it is not totally clear if this is the same species as the species farmed and it is also not totally clear to the auditor, if the farmed species can be considered as Oreochromis niloticus or if this may be a cross of other species. In addition, it is questionable but accepted that the stakeholder (head of village) can be counted as a	Statement from fisheries biologist from Regal Springs submitted confirming the species and status in the lake.	na	done	done
2.5.1		1		<u>water sampling/measurements</u> the handling of water measurements and water sampling may cause some inaccurate results due to the following reasons: - staff did not always wait until reading was stable prior to taking result - water sample was poured over hand holding sampling bottle. Potentially contaminated water was used for the sample.	see report	see report	ok	open
2.6.1		1		<u>Wetlands</u> No wetland map available showing a 5-km radius of the farm or showing pre- and post-1999 wetland coverage.	see report	see report	ok	open
4.3.1		1		<u>Transgenic statement</u> Purchase documents dont confirm that stock is not transgenic, however, it seems evident that no transgenic tilapia is commercially available.	A signed non-GMO declaration from the hatchery is available and has been submitted to IMO. Wonogiri farm uses fingerlings from this hatchery only	End August 2012	ok	done
5.1.2		1		<u>Feed supplier confirmation letter.</u> There is a letter from the feed supplier confirming these values/information. However, the Aquafarm template has not been updated to the most recent update of the guidance manual.	see report	see report	ok	open
6.1.1	1			<u>Recovery</u> The percent recovery on average only just complies with the requirements. Some individual values are significantly below 65%. This may represent a risk to potential certification, if not addressed.	na	na	na	na
6.1.1			1	<u>Recovery</u> no modification of formulae submitted to IMO prior to audit. Since it is not feasible to handle the fish in order to obtain a real count before/after stocking or around 100g, the number of fish at 100g are estimated by - using the sampling data to estimate day at 100g - harvest number minus total morts at day fish reach 100g - harvest divided by harvest&morts at day fish reach 100g X 100 This means that any fish lost due to predation, unrecorded deaths (sinking) and escapes, are not accounted for in the	Revised calculation and rationale submitted to IMO	na	na	done
6.3.2		1		<u>Dead fish</u> Collected every day and sent to local consumption and poultry feedmill. Deadfish record in the office is different from every daily deadfish record. Need more evidence to prove that all deadfish go to local consumption and poultry feed mill.	see report	see report	ok	open
Total	1	8	1					

Scope: Species of the Family Cichlidae commonly referred as Tilapia (*Oreochromis niloticus*, *O. mossambica*, *O. aureus* and *O. hybrids*)

PRINCIPLE 1. OBEY THE LAW AND COMPLY WITH ALL NATIONAL AND LOCAL REGULATIONS			Evaluation results					
1.1 Criteria: Evidence of legal compliance			Compliance Criteria (Required Client Actions):	Auditor Evaluation (Required CB Actions):	Description	ok	minor	major
1.1.1	<p>Indicator: Presence of documents proving compliance with local and national authorities on land and water use (e.g., permits, evidence of lease, concessions and rights to land and/or water use)</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	a. Maintain copies of applicable land and water use laws.	A. Review compliance with applicable land and water use laws.	National and local regulations are listed & available at the company.				
		b. Maintain original lease agreements or land titles on file.	B. Confirm client holds original lease agreements or land titles.	Permits are issued by the regencies and also by the province. Renting land agreement is available. No water using right is available (still waiting in Jakarta)		1		
		c. Keep records of inspections for compliance with national and local laws and regulations (only if such inspections are legally required in the country of operation).	C. Review inspection records for compliance with national and local laws and regulations (as applicable).	There are no inspection records.				
		d. Obtain permits and maps showing that farm does not conflict with national preservation areas.	D. Verify facility does not conflict with national preservation areas.	Maps are available and looking on the www.wdpa.org website for Indonesia, no protection area on or around the lake is identified.				
1.1.2	<p>Indicator: Presence of documents proving compliance with all tax laws</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	a. Keep records of tax payments.	A. Verify client has records of tax payments to appropriate jurisdiction(s).	The authorities come by annually to check tax payments and visit the farms to check production quantities. This inspection however is not documented, but they can apply to get a confirmation of the visit. Records at head office in Wunut. Wonogiri has to pay four kinds of tax: source water tax, worker labour tax, land and building tax, profit of company tax (for the company): 1. Source water tax: The farm has submitted the application to Jakarta to ask if they have to pay for water using license and tax. Conclusion: not compliant 2. Worker labour tax: Worker labour tax for 3 sites: based on amount of total salary. Evidence to prove the payment for 3 sites: List of workers and management in Wonogiri, Wunut, Kedung Ombo and comparing with payment. Conclusion: compliance 3. Landing and building tax: Tax has been paid. Conclusion: compliance 4. Profit of company tax: From 2010 till now, not yet paid due to the late calculation from the government. Need more evidence to explain why the company has not yet paid. not compliant			1	
		b. Maintain copies of tax laws for jurisdiction(s) where company operates.	B. Confirm client has a basic knowledge of tax requirements for farm.	Client is knowledgeable on tax requirements.				
		c. Register with national or local authorities as an "aquaculture activity".	C. Verify client is registered with local or national authorities.	The farm is registered and registration document was verified on site.				
1.1.3	<p>Indicator: Presence of documents proving compliance with all labor laws and regulations</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	a. Maintain copies of national labor codes and laws applicable to farm.	A. Confirm client has specified documentation.	Yes. The facility had the copy of applicable national labor codes and laws applicable to farm.	1			
		b. Keep records of farm inspections for compliance with national labor laws and codes (only if such inspections are legally required in the country of operation).	B. Review inspection records for compliance with national labor laws and codes (as applicable).	Further the facility obtained operation license and pollution control board certificate from appropriate authority with inspection report.				
		a. Obtain permits for water quality impacts where applicable.	A. Verify that client obtains permits as applicable.	Water quality issues are covered by biomass restriction in licences. No additional permits for water quality impacts.				

1.1.4	<p>Indicator: Presence of documents proving compliance with regulations or permits concerning water quality impacts</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>b. Comply with all discharge laws or regulations.</p> <p>c. Maintain records of monitoring and compliance with discharge laws and regulations as required.</p>	<p>B. Review evidence of compliance with discharge laws or regulations.</p> <p>C. Verify that records show compliance with discharge laws and regulations.</p>	<p>see below.</p> <p>NA. No regulation of water quality in the artificial lakes</p>	1		
PRINCIPLE 2. MANAGE THE FARM SITE TO CONSERVE NATURAL HABITAT AND LOCAL BIODIVERSITY							
2.1 Criteria: Site information		Compliance Criteria (Required Client Actions):		Auditor Evaluation (Required CB Actions):			
2.1.1	<p>Indicator: Site location, history and stewardship activities matrix located in Appendix 1, Table 1 is completed and validated</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. Complete the Receiving Water Information Checklist in Audit Reference 2 (Table 1 in Appendix 1 of the Standard).</p> <p>b. Submit checklist and attachments to CB before the on-site audit.</p>	<p>A. Do not schedule on-site audit of client until checklist review is complete.</p> <p>B. Review client submission for completeness, accuracy, and currency of information. Request clarification if needed.</p>	<p>ok</p> <p>Operator profile (including the pre-audit matrixes) and required data submissions were received prior to the audit. Some data was missing and can not feasibly be submitted prior to the audit e.g. net inspection and trapping inspection records (these are usually hand written and it does not seem feasible to have these sometimes daily records to be typed up digitally over several months if the company has confirmed that inspections are being carried out.</p>	1		

			C. Verify client information by cross-checking with independent sources (e.g. local authorities).	Client information cross-checked with permits and stakeholder information.			
2.2 Criteria: Presence of natural or established tilapia species		Compliance Criteria (Required Client Actions):		Auditor Evaluation (Required CB Actions):			
2.2.1	<p>Indicator: Demonstration that the tilapia species cultured is established^[1] and naturally reproducing in the receiving waters^[2], of the operation on or before 1 January 2008^[3]</p> <p>Requirement: Yes</p> <p>Applicability: All farm locations outside Africa (see 2.2.2), Farm-Wide</p>	<p>a. Collect documentary evidence that cultured species was established in receiving waters on or before 1 January 2008, or</p> <p>Collect first hand accounts showing evidence for natural reproduction of tilapia species in receiving waters on or before 1 January 2008. Submit evidence with checklist (Audit Reference 2).</p> <p>b. If system does not have receiving waters according as defined in this requirement^[2] then the requirements of Indicator 2.2.1 are not applicable.</p> <p>c. If water is discharged into municipal water systems, show that there is a mechanism for treating effluent to eradicate/eliminate macro-biological organisms such as fish.</p>	<p>A. Review evidence for compliance with the Requirement. Acceptable documentary evidence: peer-reviewed literature; verifiable Environmental Impact Assessment; and government certification.</p> <p>Acceptable first hand accounts: community testimonials and direct evidence for multiple size classes of tilapia species in receiving waters captured with cast nets, trapping devices or fishing.</p> <p>B. Auditor response to 2.2.1A is "not applicable" (NA).</p> <p>C. Review evidence to confirm compliance.</p>	<p>There is a government certification (regency Sragen), that <i>tilapia (ikor nila)</i> is established and naturally reproducing in the lake and has been present in the lake prior to before 1 January 2008. However, it is not totally clear if this is the same species as the species farmed and it is also not totally clear to the auditor, if the farmed species can be considered as <i>Oreochromis niloticus</i> or if this may be a cross of other species. In addition, it is questionable but accepted that the stakeholder (head of village) can be counted as a government certification.</p> <p>ok</p> <p>NA, cage systems.</p>			1
Footnote	<p>^[1] "A non-indigenous species is considered established if it has a reproducing population within the basin, as inferred from multiple discoveries of adult and juvenile life stages over at least two consecutive years. Given that successful establishment may require multiple introductions, species are excluded if their records of discoveries are based on only one or a few non-reproducing individuals whose occurrence may reflect merely transient species or unsuccessful invasions." (National Oceanic and Atmospheric Administration)</p>						
Footnote	<p>^[2] "Receiving water" is defined as all distinct bodies of water that receive runoff or waste discharges, such as streams, rivers, ponds, lakes and estuaries (adapted from World Health Organization). This does not include farm-constructed water courses, impoundments or treatment facilities.</p>						
Footnote	<p>^[3] Where there are no-discharge systems, or no discharge to receiving waters, requirements 2.2.1 and 2.2.2 are not applicable.</p>						
2.2.2	<p>Indicator: In Africa, demonstration that the tilapia species and strain cultured is established and naturally reproducing in the receiving waters of the operation or before 1 January 2008</p> <p>Requirement: Yes</p> <p>Applicability: Farms located in Africa only (see 2.2.1), Farm-Wide</p>	<p>a. Collect documentary evidence that cultured species and strain was present in receiving waters on or before 1 January 2008 or</p> <p>Collect first hand accounts showing evidence for natural reproduction of tilapia species and strain in receiving waters on or before 1 January 2008. Submit evidence with checklist (Audit Reference 2).</p> <p>b. If system does not have receiving waters as defined in this Requirement^[2] then the requirements of Indicator 2.2.2 are not applicable.</p> <p>c. If water is discharged into municipal water systems, show that there is a mechanism for treating effluent to eradicate/eliminate macro-biological organisms such as fish.</p>	<p>A. Review evidence for compliance with the Requirement. Acceptable documentary evidence: peer-reviewed literature; verifiable Environmental Impact Assessment; and government certification.</p> <p>Acceptable first hand accounts: community testimonials and direct evidence for multiple size classes of tilapia species in receiving waters captured with cast nets, trapping devices or fishing.</p> <p>B. Auditor response to 2.2.2A is "not applicable" (NA).</p> <p>C. Review evidence to confirm compliance.</p>	<p>NA</p> <p>NA</p> <p>NA</p>			1

2.3 Criteria: The effects of eutrophication		Compliance Criteria (Required Client Actions):	Auditor Evaluation (Required CB Actions):			
2.3.1	<p>Indicator: The percent change in diurnal dissolved oxygen of receiving waters relative to dissolved oxygen at saturation for the water's specific salinity and temperature</p> <p>Requirement: ≤ 65%</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>Instruction to Clients for Indicator 2.3.1 - Diurnal Difference in Dissolved Oxygen (DDDO)</p> <ul style="list-style-type: none"> - Sampling for DDDO is done at least once per month and is measured only at Receiving Water Farm Afar (RWFA) site. - Measure dissolved oxygen (DO), conductivity (or salinity), and temperature at 0.3 m depth. Take all three measurements at the same time. - For each monthly sampling of DDDO, take measurements two times: 1 hour before sunrise and 2 hours before sunset. - Equations for calculating DDDO are given in Audit Reference 6 (also Equation 1 in Appendix III of the Standard). <p>Note 1: For farms located in temperate zones, audits will occur during the 4-month window of peak primary productivity in receiving waters.</p> <p>Note 2: For farms where thermal destratification occurs (a natural event when oxygen is depleted due to mixing of deep waters with surface waters), the detection of low oxygen concentration will be recorded but will not be considered a non-conformance.</p> <p>Note 3: The pre-sunset measurements are taken at the same time that samples are collected for water quality monitoring (see Instructions for 2.5.1) at the day of the audit.</p>				
		a. Collect ≥ 12 months of DDDO samples if farm was built after December 2009 (farms built before December 2009 need only 6 months of data).	A. Do not schedule on-site audit until client provides baseline DDDO data.	ok		
		b. Calibrate all equipment at the frequency and by the method recommended by the manufacturer. Calibrate daily if there is no manufacturer's recommendation.	B. Verify that client calibrates equipment as required.	ok		
		c. Adjust DO at saturation to reflect temperature, salinity and altitude during calibration or in calculations (see Audit Reference 6).	C. Verify that client adjusts for temperature, salinity and altitude through calibration or in calculations (Audit Reference 6).	ok, this is done automatically by the equipment used.		
		d. Calculate DDDO using equation 1 (Audit Reference 6) and oxygen saturation values (Audit Reference 5). Enter DDDO values into Water Quality Monitoring Matrix (Audit Reference 4).	D. Review Water Quality Monitoring Matrix. Verify that all DDDO measurements from the receiving water comply with the Requirement.	More than 12 months data available. All measurements comply with the requirement.	1	
		e. Calculate average annual DDDO for the prior 12-month period. Enter result into Water Quality Monitoring Matrix (Audit Reference 4).	E. Review monitoring matrix and confirm that mean annual DDDO ≤ 65 %.	More than 12 months data available. Annual DDDO values are < 65% (see separate data sheet).		
	f. Arrange to take DO measurements while the auditor is at the farm.	F. Witness client measuring DO. On-site values should fall within range of farm data for DDDO. If an out of range measurement is observed, raise a non-conformity.	DO measuring was witnessed. Results are within range.			
2.4 Criteria: Water quality in oligotrophic receiving waters		Compliance Criteria (Required Client Actions):	Auditor Evaluation (Required CB Actions):			
2.4.1	<p>Indicator: Secchi disk visibility⁽⁴⁾ limit above which production is not certifiable</p> <p>Requirement: 10 meters</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>Instruction to Clients for Indicator 2.4.1 - Upper Limit of Secchi Disk Visibility (SD)</p> <p>The TAD concluded that "Water bodies with an average annual Secchi disk visibility at or above 10 meters are not permitted to be used as receiving waters under the ISRTA because of their ecological uniqueness and rarity." Thus, Indicator 2.4.2 sets an upper limit on eligibility for certification: SD ≤ 10 m.</p> <ul style="list-style-type: none"> - Testing of the upper limit of SD is done only at the RWFA sampling station. - When depth at RWFA station is < 10 meters, the Requirement does not apply. - The required methods and equipment for measuring SD are given in Audit Reference 1. 				
		a. Collect ≥ 12 months of SD readings at RWFA station (for first audits, farm must have ≥ 6 months of data). Enter SD values into Water Quality Monitoring Matrix (Audit Reference 4).	A. Review matrix to verify that average annual SD < 10 m. If average annual SD equals or exceeds 10 m, production is not certifiable.	Average annual readings <10m.		
	b. Arrange to take SD measurements at RWFA during the audit of the farm. The auditor will witness and replicate your SD measurements.	B. Witness client measuring SD. Repeat the SD measurement yourself at the same time and location. Record both sets of values.	Monitoring was witnessed. This was carried out according to the requirements. Data and analysis is recorded in separate sheet of this annex.	1		

			C. Calculate percent error of farm data using Equation 2 (Audit Reference 6). If < 5% difference is observed between auditor and farm min and max SD readings, then accept the annual average from farm data. If > 5% difference is observed between auditor and farm min and max SD readings, then raise a non-conformity (see Audit Reference 3).	Percent error <1%. Data and analysis is recorded in separate sheet of this annex.			
Footnote	[4] Measurements shall be taken at the Receiving Water Farm Afar (RWFA) sampling station. See Appendix II for RWFA definition.						
2.4.2	<p>Indicator: Compliance with Requirements 2.4.3. & 2.4.4. when Secchi disk visibility^[4] ≤ 5.0 meters</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>Instruction to Clients for Indicator 2.4.2 - Decision about Oligotrophy using SD</p> <p>The TAD concluded that it was necessary to protect oligotrophic waters from excessive nutrient loading. They imposed strict limits on concentration of Total Phosphorus (Indicator 2.4.3) and Chlorophyll <i>a</i> (Indicator 2.4.4). To decide whether a given waterbody is oligotrophic or not, the TAD mandated a functional definition: "Oligotrophic receiving waters are characterized as those that have a Secchi disk visibility equal to or greater than 5.0 meters." Thus, the Secchi disk measurement (SD) will determine whether Standard nutrient limits shall apply to a given receiving water. The flow chart in Audit Reference 7 shows how to make decisions using SD measurements.</p> <p>A few points about the logic of the decision-making process must be noted:</p> <ul style="list-style-type: none"> - Highly oligotrophic waters (i.e. where the average annual SD is > 10 m) are automatically ineligible from certification because they do not comply with Indicator 2.4.1. - The decision about oligotrophy is made based solely on SD measurements taken at RWFA (i.e. SD measures from RWRP, RWFO or other locales are not considered). - The auditor will verify accuracy of farm SD measurements while on site. Where farm and auditor measurements differ, the auditor's SD measurement shall prevail. - When deciding if Requirement nutrient limits apply to a receiving water body, the auditor shall also compare the annual average SD to the on-site SD measurement. - If water depth at RWFA is < 5.0 meters and the SD measurement is to 'bottom' then 2.4.3 and 2.4.4 are not applicable. <p>Note: If the client suspects that an abrupt reduction in SD as measured by the auditor (e.g. case D below) was caused by natural seasonal variations (i.e. summer blooms or rainy season turbidity), the client may request exemption from 2.4.3 and 2.4.4 but only if it can be shown annual average SD has not decreased by > 5% over the previous 2 years.</p>					
		a. If auditor measurement shows SD > 5.0 m and annual mean SD < 5.0 m, then (see next column -->)	A. Proceed to Indicator 2.4.3 and 2.4.4.	NA, all secchi disk readings are <5m.			
		b. If auditor measurement shows SD > 5.0 m and annual mean SD > 5.0 m, then (see next column -->)	B. Stop	NA		1	
		c. If auditor measurement shows SD ≤ 5.0 m and annual mean SD < 5.0 m, then (see next column -->)	C. Stop	ok			
		d. If auditor measurement shows SD ≤ 5.0 m and annual mean SD > 5.0 m, then (see next column -->)	D. Proceed to Indicator 2.4.3 and 2.4.4.	NA			
2.4.3	<p>Indicator: Total phosphorus concentration limit in receiving waters^[4]</p> <p>Requirement: ≤ 20 µg/L</p> <p>Applicability: All Farms, Farm-Wide</p>	a. If required under Indicator 2.4.2, collect water samples at RWFA. Determine total phosphorus concentration.	A. Take duplicate water sample at RWFA. Have sample analyzed by a qualified independent laboratory for total phosphorus concentration (for handling, see Indicator 2.5.1)	NA			
		b. Report results to CB.	B. Calculate percent error of farm data using Equation 2 (Audit Reference 6). If > 5% difference is observed between auditor data and farm min/max, raise a non-conformity (see Audit Reference 3).	NA		1	
		c. Analyze total phosphorus concentrations in all subsequent water samples from monthly water quality monitoring. Continue until instructed otherwise by the CB.	C. Verify that samples from receiving waters comply the Requirement.	NA			

2.4.4	<p>Indicator: Chlorophyll <i>a</i> concentration limit in receiving waters⁽⁴⁾</p> <p>Requirement: ≤ 4.0 µg/L</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. If required under Indicator 2.4.2, collect water samples at RWFA. Determine chlorophyll <i>a</i> concentration.</p>	<p>A. Take duplicate water sample at RWFA. Have sample analyzed by a qualified independent laboratory for chlorophyll <i>a</i> concentration (for handling, see Indicator 2.5.1)</p>	NA			
		<p>b. Report results to CB.</p>	<p>B. Calculate percent error of farm data using Equation 2 (Audit Reference 6). If > 5% difference is observed between auditor data and farm min/max, raise a non-conformity (see Audit Reference 3).</p>	NA	1		
		<p>c. Analyze chlorophyll <i>a</i> concentrations in all subsequent water samples from monthly water quality monitoring. Continue until instructed otherwise by the CB.</p>	<p>C. Verify that samples from receiving waters comply the Requirement.</p>	NA			
2.5 Criteria: Receiving water monitoring		Compliance Criteria (Required Client Actions):		Auditor Evaluation (Required CB Actions):			
2.5.1	<p>Indicator: Receiving water quality monitoring matrix completed and validated (Appendix II)</p> <p>Requirement: Yes (6 months data, pre-audit, required)</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>Instruction to Clients for Indicator 2.5.1 - Water Quality Monitoring</p> <ul style="list-style-type: none"> - Required parameters for the water quality monitoring program are shown in Appendix II of the Standard. - Samples are collected from each of the 3 sampling stations: RWRP; RWFO; and RWFA. - A minimum of one sample is taken per station but the TAD encourages multiple sampling to investigate waterbody dynamics. - Water samples are taken from a 1-meter column of water or deeper. - Water samples are taken 2 hours before sunset. - Water samples must be kept in sealed coolers and kept at a temperature of less than 10°C. <p>Note 1: Laboratories used by the auditor for analyses not performed on site with auditor equipment will use ISO methods as described in Audit Reference 1, and farms are suggested to periodically send water samples to these laboratories to assure farm analyses are within a 5% level of error.</p> <p>Note 2: Water samples from RWFA should be taken at the same time that DO is measured for the calculation of DDDO (see Instructions for Indicator 2.3.1) at the day of the audit.</p>					
		<p>a. Conduct ≥ 6 months of water quality monitoring before first audit.</p>	<p>A. Do not schedule the on-site audit until client has monitoring dataset.</p>	The monitoring was received prior to the audit.			
		<p>b. Complete the Water Quality Monitoring Matrix (Audit Reference 4) and submit to CB.</p>	<p>B. Review Matrix to verify that client monitored all required parameters at the required frequency.</p>	All required parameters were monitored at the required frequency.			
		<p>c. Calibrate all equipment at the frequency and by the method recommended by the manufacturer. Calibrate daily if there is no manufacturer's recommendation.</p>	<p>C. Verify that client calibrates equipment as required.</p>	Equipment was calibrated prior to taking measurements, as required for the individual equipment.			
		<p>d. During the audit of the farm, arrange to conduct water quality monitoring. The auditor will witness and replicate water sampling.</p>	<p>D. Witness client conducting water quality monitoring. Repeat on-site measurements at the same time and location. Record both sets of values.</p>	<p>Water quality monitoring was witnessed. This was carried out according to the requirements. Data and analysis is recorded in separate sheet of this annex.</p> <p>the handling of water measurements and water sampling may cause some inaccurate results due to the following reasons:</p> <ul style="list-style-type: none"> - staff did not always wait until reading was stable prior to taking result - water sample was poured over hand holding sampling bottle. Potentially contaminated water was used for the sample. 		1	
		<p>e. Collect water samples and prepare them for shipment as applicable.</p>	<p>E. Collect duplicates of water samples for independent analyses performed by either the CB or an independent laboratory (i.e. not by farm staff). At a minimum, the independent analyses shall include determination of: chlorophyll <i>a</i> (µg/L), phosphate-phosphorus (µg/L), ammonia-nitrogen (µg/L), and turbidity (NTU). Keep samples in a sealed cooler at < 10°C.</p>	<p>Duplicate samples were collected and sealed as well as possible prior to giving the samples to the farm manager for freezing (in preparation for transport). The samples were submitted to a qualified lab for analysis. The analysis included phosphate-P, ammonia-N, all other water monitoring parameters were measured on site. Data and analysis is recorded in separate sheet of this annex.</p>			

		f. Perform routine analysis of water samples (i.e. done in the same manner as for previous months of water quality monitoring).	F. Keep samples under auditor control until analyses are complete or until samples are placed into custody of a qualified independent laboratory.	Samples were given to the farm manager for freezing until departure of the auditors, however, samples were sealed and coded (farm manager is not informed which code represents which sample site).			
		g. Record values for each parameter and submit results to CB.	G. Calculate percent error of farm data using Equation 2 (Audit Reference 6). If > 5% difference is observed between auditor and farm data, raise a non-conformity (see Audit Reference 3).	>5% error was observed between farm and auditor data for some of the water parameters. However, for some of the measurements the background noise is higher than 5% and all variation can be easily/logically explained. Notes on such variation is added in separate sheet of this annex. Together with the assessment of reasons leading to percentage variation between the different data sets, this criteria is judged to be adequately compliant.			
2.6 Criteria: Wetland conservation		Compliance Criteria (Required Client Actions):		Auditor Evaluation (Required CB Actions):			
2.6.1	<p>Indicator: Hectares of allowable wetland^[5] conversion since 1999^[6]</p> <p>Requirement: 0 ha</p> <p>Applicability: All Farms, Farm-Wide</p>	a. Provide a map delineating all wetlands currently within a 5-km radius of the farm.	A. Evaluate whether there is evidence for any wetland conversion occurring within a 5-km radius of the farm since 1999.	It is an artificial lake created by the building of the dam in 1976. Previously, there was a river and according to stakeholder information no wetlands.			1
		b. Prepare a map showing pre- and post-1999 wetland coverage at farm site.	B. If evidence shows that farm siting or related activities have resulted in loss of wetland habitat since 1999, then the client is not certifiable.	No wetland map available showing a 5-km radius of the farm or showing pre- and post 1999 wetland coverage. However, there is no evidence that wetland habitat has been lost due to the farming activities.			
Footnote	^[5] "Wetland is defined as lands where saturation with water is the dominant factor determining the nature of soil development and the types of plant and animal communities living in the soil and on its surface." (United States Environmental Protection Agency)						
Footnote	^[6] The year Ramsar contracting parties adopted strategic framework for the development of the Ramsar List						
PRINCIPLE 3. CONSERVE WATER RESOURCES							
3.1 Criteria: Nutrient utilization efficiency		Compliance Criteria (Required Client Actions):		Auditor Evaluation (Required CB Actions):			
3.1.1	<p>Indicator: The total amount of phosphorus added to the culture system per metric ton of fish produced per year. Use equations from Appendix III.</p> <p>Requirement: ≤ 27 kg</p> <p>Applicability: All Farms, Unit of Certification Only</p> <p>Clients may omit/delete pricing details from purchase documents.</p>	a. Calculate total weight of feed used. Keep invoices.	A. Review invoices to confirm the total weight of feed used.	Total weight of feed confirmed during on-site visit.			
		b. Calculate total weight of all fish purchased. Keep invoices.	B. Review invoices to confirm the total weight of fish purchased.	Total weight of fish purchase confirmed during on-site visit.			
		c. Calculate total weight of fish produced. Keep invoices for all fish sold or shipped.	C. Review invoices to confirm the total weight of fish sold or shipped.	Total weight of fish sold confirmed during on-site visit.			1
		d. Obtain a signed letter from feed manufacturer stating phosphorus content of the feed.	D. Confirm that a letter from the feed manufacturer states phosphorus content.	Letter from feed suppliers is available.			
		e. Complete nutrient budget worksheet (Audit Reference 8).	E. Review nutrient budget worksheet for accuracy.	Nutrient budget worksheet completed and submitted prior to audit.			
		-	F. Confirm that total phosphorus added does not exceed requirement.	Original data (feed invoices, feed supplier statement etc) and calculations were verified. Total amount of phosphorus added to the culture system per metric ton of fish produced per year is below the requirements in the standard (see separate annex).			

		<i>Farms without post-culture treatment for phosphorus</i>	<i>Farms without post-culture treatment for phosphorus</i>			
3.1.2A	<p>Indicator: The total amount of phosphorus released from the culture system per metric ton of fish produced per year. Phosphorus loading will be either calculated using equations from Appendix III or measured in effluent if there is post-culture treatment.</p> <p>Requirement: ≤ 20 kg</p> <p>Applicability: Farms with no post-culture treatment for phosphorus, Unit of Certification Only</p> <p>Clients may omit/delete pricing details from purchase documents.</p>	a. Calculate total weight of feed used. Keep invoices.	A. Review invoices to confirm the total weight of feed used.	Total weight of feed confirmed during on-site visit.		
		b. Calculate total weight of all fish purchased. Keep invoices.	B. Review invoices to confirm the total weight of fish purchased.	Total weight of fish purchase confirmed during on-site visit.		
		c. Calculate total weight of fish produced. Keep invoices for all fish sold or shipped.	C. Review invoices to confirm the total weight of fish sold or shipped.	Total weight of fish sold confirmed during on-site visit.		1
		d. Complete nutrient budget worksheet (Audit Reference 8)	D. Review nutrient budget worksheet for accuracy.	Nutrient budget worksheet completed and submitted prior to audit.		
		-	E. Confirm that phosphorus released does not exceed requirement.	Original data (feed invoices, fish invoices, nutrient budget worksheet etc) and calculations were verified. Total amount of phosphorus released from the culture system per metric ton of fish produced per year is below the requirements in the standard (see separate annex).		
3.1.2B	<p>Indicator: The total amount of phosphorus released from the culture system per metric ton of fish produced per year. Phosphorus loading will be either calculated using equations from Appendix III or measured in effluent if there is post-culture treatment.</p> <p>Requirement: ≤ 20 kg</p> <p>Applicability: Farms that use post-culture treatment for phosphorus, Unit of Certification Only</p> <p>Clients may omit/delete pricing details from purchase documents.</p>	<i>Farms with post-culture treatment for phosphorus</i>				
		f. Complete steps a-d (above) for Indicator 3.1.2A.	F. Complete steps A-D (above) for Indicator 3.1.2A.	NA, no post-culture treatment.		
		g. Describe method for treatment (e.g. sludge removal for fertilizer, water treatment facilities, etc.) and means of quantifying phosphorus capture.	G. View evidence for effective post-culture treatment.	NA		
		h. Keep records of the quantity of phosphorus captured by treatment.	H. Review records for phosphorus capture.	NA		1
		i. Subtract net phosphorus captured in treatment facility from total output of phosphorus, expressed as kg P/mt fish produced over prior 12-month period.	I. Review calculations for accuracy.	NA		
		-	J. Confirm that the total amount of phosphorus released does not exceed requirement.	NA		
3.1.3	<p>Indicator: Calculation and verification of the total amount of nitrogen applied to the culture system. Use equations from Appendix III.</p> <p>Requirement: Measured in kg nitrogen/mt fish/year</p> <p>Applicability: All Farms, Unit of Certification Only</p> <p>Clients may omit/delete pricing details from purchase documents.</p>	a. Calculate total weight of feed used. Keep invoices.	A. Review invoices to confirm the total weight of feed used.	Total weight of feed confirmed during on-site visit.		
		b. Calculate total weight of all fish purchased. Keep invoices.	B. Review invoices to confirm the total weight of fish purchased.	Total weight of fish purchase confirmed during on-site visit.		
		c. Calculate total weight of fish produced. Keep invoices for all fish sold or shipped.	C. Review invoices to confirm the total weight of fish sold or shipped.	Total weight of fish sold confirmed during on-site visit.		1
		d. Obtain a signed letter from feed manufacturer stating nitrogen content of the feed.	D. Confirm that a letter from the feed manufacturer states nitrogen content.	Letter from feed suppliers is available.		
		e. Complete nutrient budget worksheet (Audit Reference 8)	E. Review nutrient budget worksheet for accuracy.	Original data (feed invoices, feed supplier statement etc) and calculations were verified. Total amount of nitrogen applied to the culture system is calculated (see separate annex).		

3.1.4	<p>Indicator: Calculation and verification of the total amount of nitrogen released from the farming activity. Use equations from Appendix III.</p> <p>Requirement: Measured in kg nitrogen/mt fish/year</p> <p>Applicability: All Farms, Unit of Certification Only</p> <p>Clients may omit/delete pricing details from purchase documents.</p>	a. Calculate total weight of feed used. Keep invoices.	A. Review invoices to confirm the total weight of feed used.	Total weight of feed confirmed during on-site visit.				
		b. Calculate total weight of all fish purchased. Keep invoices.	B. Review invoices to confirm the total weight of fish purchased.	Total weight of fish purchase confirmed during on-site visit.				
		c. Calculate total weight of fish produced. Keep invoices for all fish sold or shipped.	C. Review invoices to confirm the total weight of fish sold or shipped.	Total weight of fish sold confirmed during on-site visit.			1	
		d. Use equation from Audit Reference 6 to calculate total amount of nitrogen released.	D. Confirm calculation.	Original data (feed invoices, fish invoices, nutrient budget worksheet etc) and calculations were verified. Total amount of nitrogen released from the farming activity is calculated (see separate annex).				
		e. Complete nutrient budget worksheet (Audit Reference 8)	E. Review nutrient budget worksheet for accuracy.	Reviewed				
3.2 Criteria: Groundwater salinization		Compliance Criteria (Required Client Actions):		Auditor Evaluation (Required CB Actions):				
3.2.1	<p>Indicator: Percent change in specific conductance of freshwater from a drilled well at the time of drilling and the time of audit. This is required when freshwater wells are used in combination with brackish surface water for the culture of tilapia. Freshwater aquifers are defined as having a specific conductance less than 1,300 µS/cm.</p> <p>Requirement: ≤ 10 %</p> <p>Applicability: Only farms where brackish water is used for tilapia culture, Farm-Wide</p>	a. Inform CB if brackish water is used for tilapia culture (3.2.1 applies only to farms where surface water is > 1,300 µS/cm or initial well water is < 1,300 µS/cm).	A. Confirm whether client uses brackish water for tilapia culture. If not, then auditor response to 3.2.1B-E is "not applicable" (NA).	NA, no brackish water is used.				
		b. Show well locations on map of farm.	B. Confirm well locations.	NA			1	
		c. Record date of drilling and initial specific conductance (µS/cm) at each well.	C. Retain a record of location and initial specific conductance for wells.	NA				
		d. Measure specific conductance of all wells less than 4 weeks before audit.	D. Review updated measurements of specific conductance. Compare values to initial measurements taken from the same wells.	NA				
		-	E. Verify that specific conductance at wells did not change by > 10 %.	NA				
PRINCIPLE 4. CONSERVE SPECIES DIVERSITY AND WILD POPULATIONS								
4.1 Criteria: Escapes from aquaculture facilities		Compliance Criteria (Required Client Actions):		Auditor Evaluation (Required CB Actions):				
4.1.1	<p>Indicator: Presence of net mesh or grills/screens, barriers on inlets and outlets of culture vessels (e.g., tanks, ponds and raceways), and mesh on all netted confinement units (e.g., cages and impoundments), appropriately sized to retain the stocked fish</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	a. Install net mesh, screens and barriers in required locales.	A. Inspect site to verify that net mesh, screens and barriers are in place.	Cage system.			1	
		b. Use meshes that are appropriately sized to retain stocked fish.	B. Inspect site to verify meshes are appropriately sized to retain stocked fish.	Nets are an adequate size for the farmed species/size.				
4.1.2	<p>Indicator: Presence of net mesh, or grills/screens and permanent barrier inspection register recording dates, findings and actions taken, including mitigation or fish containment structure repairs</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	a. Establish program for regular inspection of permanent barriers.	A. Inspect site to verify effectiveness of inspection program.	Cage system. Nets were found to be appropriately sized according to 4.1.1.				
		b. Record the dates, findings and actions taken in an 'Inspection Register'.	B. Review records.	Records available for required period and records are complete.			1	
		-	C. Do not schedule the first audit until client submits 6 months of inspection data.	ok				
4.1.3	<p>Indicator: Presence of trapping devices placed in effluent/drainage canals or in between cages to sample for escapees, and a record of findings and actions taken</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	a. Establish program for monitoring escapes with trapping devices.	A. Inspect farm to verify that trapping devices are used in an effective and representative way for monitoring escapees.	Trapping devices installed, two per line. Tilapia is occasionally trapped, however, it is not clear if they come from the farm. Effectiveness of trapping device seems limited with this sort of cage system.				
		b. Record all traps used, findings and actions taken.	B. Review records.	Records available for required period and records are complete.			1	
		c. Collect data for 6 months before first audit.	C. Do not schedule the first audit until client submits 6 months of monitoring data.	ok				
4.1.4	<p>Indicator: In cage culture systems, the minimum distance between the bottom of the cage and the bottom of the receiving waters where the cage is placed</p> <p>Requirement: ≥ 3.0 m</p> <p>Applicability: Cage systems only, Farm-Wide</p>	-	A. For cage systems, confirm that distance between cage bottom and bottom sediment is ≥ 3 m.	Cages are 3m deep. The lake is at its lowest point 15-40m. It is an artificially dammed lake. The hydroelectric company however does not have any data on water levels. Depth is measured by Aquafarm monthly during each water monitoring event. Depth data is available but was not further verified during the audit.			1	
		<i>If the farm is a land-based system, the client shall arrange to have tilapia cultures sampled for percentage of male fish (or sterile fish) as follows:</i>	<i>For land-based systems, the auditor shall confirm that clients follow requirements for determination of percentage of male fish (or sterile fish) in culture.</i>					

4.1.5	<p>Indicator: The minimum percentage of males or sterile fish in a culture unit</p> <p>Requirement: 95 %</p> <p>Applicability: Land-based systems only, Farm-Wide</p>	a. Select three (3) culture vessels at random.	A. Verify samples were selected at random.	NA, cage systems.	1			
		b. Capture 40 fish from each culture vessel for a total of 120 fish.	B. Verify that fish originated from different culture vessels.	NA, cage systems.				
		c. Determine the number of fish in the sample that are male (or sterile).	C. Verify method used to determine sex (or sterility).	NA, cage systems.				
		d. Calculate the percentage of male fish (or sterile fish) in culture.	D. Review results to confirm compliance with the requirement.	NA, cage systems.				
		e. Alternate approach when farm has fewer than 3 culture vessels: capture a total of 100 fish and determine the percentage male fish (or sterile fish).	E. As for 4.1.5D.	NA, cage systems.				
4.2 Criteria: Transporting live tilapia		Compliance Criteria (Required Client Actions):		Auditor Evaluation (Required CB Actions):				
4.2.1	<p>Indicator: Presence and evidence of use of fish transport containers that have no escape path for fish</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	a. For transport of live fish to the farm (e.g. fry), ensure that containers do not provide escape paths for fish.	A. Inspect site to verify containers do not provide escape paths for live fish transported to the farm.	Fingerlings are brought into the farm in a special netcage boat. Nets are not totally sealed to the rim and it seems there can be escape paths. Although there is room for improvement in terms of escape prevention, the system seems adequate.	1			
		b. For transport of live fish away from the farm (e.g. harvested fish), ensure that containers do not provide escape paths for fish.	B. Inspect site to verify containers do not provide escape paths for live fish transported from the farm.	Harvest was observed. Cages are pulled in and fish are encouraged to swim into harvest area by pulling up the harvest cage net. From there a plastic basket is filled with fish and covered with a net to avoid escapes, which is lifted onto the conveyor and into the tanks on the trunk. Several procedures are put in place to avoid escapes. Fish are harvested into sealed tanks, which hardly allows an escape path for fish.				
4.3 Criteria: Transgenic fish		Compliance Criteria (Required Client Actions):		Auditor Evaluation (Required CB Actions):				
4.3.1	<p>Indicator: Allowance for the culture of transgenic tilapia</p> <p>Requirement: No (None allowed)</p> <p>Applicability: All Farms, Farm-Wide</p>	a. Maintain records for the origin of all cultured stocks including the supplier name, address and contact person(s) for stock purchases.	A. Review records to confirm compliance with the requirement	The farm manager Wayan is also the manager of the hatchery and the other 3 Aquafarm farms on Java. Records available.	1			
		b. Purchase documents must confirm that culture stock is not transgenic.	B. If the auditor suspects that transgenic fish are in culture, test stock identity by collecting 3 fish and sending to an ISO 17025 certified laboratory for genetic analysis.	Purchase documents dont confirm that stock is not transgenic, however, it seems evident that no transgenic tilapia is commercially available.				

4.4 Criteria: Predator control		Compliance Criteria (Required Client Actions):	Auditor Evaluation (Required CB Actions):			
4.4.1	Indicator: Use of lethal ^[7] predator control Requirement: No (None allowed) Applicability: All Farms, Farm-Wide	a. Prepare a list of all predator control devices and their locations.	A. Review list.	No lethal or non-lethal predator control devices. Some birds around lake, but none obviously around farm. Therefore, no list available.	1	
		-	B. Inspect sites to verify no use of lethal predator controls.			
Footnote ^[7] The use of lethal predator control is prohibited, unless a predator becomes impinged in netting and is required to be euthanized.						
4.4.2	Indicator: Mortality of IUCN red listed species Requirement: 0 (zero) Applicability: All Farms, Farm-Wide	Instruction to Clients for Indicator 4.4.2 - Presence of IUCN Red List Species Determine whether IUCN red list species are present in the region as follows: - go to http://www.iucnredlist.org/ - follow to "other search options" - select "Taxonomy" - select "Animalia" - indicate appropriate "Location", "Systems", "Habitat", - click on "run search" and record species listed and whether they are threatened by the farming activity. Note: The IUCN Red List uses nine categories for ranking species according to threat, and search results may include species that are not currently threatened. For the purposes of determining whether a farm complies with indicator 4.4.2, species in the following IUCN categories may be excluded from further analyses: "Not evaluated", "Data Deficient", and "Least Concern".				
		a. Perform analysis. Record all IUCN red list species and farm-related threats.	A. Repeat analysis to verify that client obtained an accurate result.	Analysis and same result was found. No IUCN red listed species.	1	
		b. If an IUCN Red List species is identified in region of the farm (including receiving and source waters), take appropriate precautions.	B. Verify that client takes appropriate precautions as required.	NA, no IUCN red listed species.		
PRINCIPLE 5. USE RESOURCES RESPONSIBLY						
5.1 Criteria: Use of wild fish for feed (fishmeal and oil)		Compliance Criteria (Required Client Actions):	Auditor Evaluation (Required CB Actions):			
5.1.1	Indicator: Feed Fish Equivalence Ratio (FFER). See Appendix IV for feed calculations. Requirement: ≤ 0.8 Applicability: All Farms, Unit of Certification Only	a. Obtain a signed letter from feed manufacturer stating percentage of fish meal and/or fish oil (Audit Reference 9) in feed used during the past 12 months.	A. Verify that values are stated in a letter from the feed manufacturer.	There is a letter from the feed supplier confirming these values/information. ok Original data, statement from feed supplier and calculations were verified. Calculation results confirm compliance.	1	
		b. For FFER calculations, exclude fish meal and fish oil derived from rendering of seafood by-products (e.g. the 'trimmings' from a human consumption fishery).	B. Verify client excludes rendered seafood byproducts from calculation of FFER.			
		c. Calculate FFER using equations in Audit Reference 6 (also Appendix IV of Standard).	C. Verify that FFER calculations were done correctly.			
		-	D. Confirm that FFER complies with the Requirement			

5.1.2	<p>Indicator: Allowance for the use of fishmeal and fish oil in tilapia feed containing products from fisheries that are listed on the IUCN's Red List or the species list maintained by the Convention on the International Trade of Endangered Species of Wild Fauna and Flora</p> <p>Requirement: None</p> <p>Applicability: All Farms, Unit of Certification Only</p>	<p>a. Obtain a signed letter from feed manufacturer identifying the origin (genus, species and region harvested) of fish used in fish meal/oil (Audit Reference 9).</p> <p>b. Determine if any of the species used in fish feed are on the IUCN's Red List following the instructions given for Indicator 4.4.2.</p> <p>c. Determine if any of the species used in fish feed are listed by CITES as follows: - go to http://www.cites.org/eng/resources/species.html - select option "Species" and click "find it"</p>	<p>A. Verify that species used in fishmeal are identified in a letter from the feed manufacturer.</p> <p>B. Repeat search of IUCN database to verify that client obtained an accurate result.</p> <p>C. Repeat search of CITES database to verify that client obtained an accurate result.</p>	<p>There is a letter from the feed supplier confirming these values/information. However, the Aquafarm template has not been updated to the most recent update of the guidance manual and origin of species is missing in one of the examples.</p> <p>The results are accurate</p> <p>The results are accurate</p>	1		
5.1.3	<p>Indicator: Timeframe for producers to source feed containing fishmeal or fish oil originating from fisheries deemed sustainable by an ISEAL member's accredited certification scheme</p> <p>Requirement: 5 years following the date of ISRTA publication</p> <p>Applicability: All Farms, Unit of Certification Only</p>	<p>a. Prepare a policy stating the organization's support of efforts to shift feed manufacturers to an ISEAL-accredited certification scheme for fish meal/oil origins.</p> <p>b. Prepare a letter stating the organization's intent to source feed containing fishmeal or fish oil originating from fisheries deemed sustainable by an ISEAL member's accredited certification scheme by 19 December 2014.</p> <p>c. Affirm support of the process through internal and external communications (e.g. correspondence with feed manufacturers).</p>	<p>A. Verify that the client's policy supports sustainable feed sourcing (e.g. programs at http://www.isealliance.org/portrait/full%20member).</p> <p>B. Obtain a copy of client's letter of intent.</p> <p>C. Confirm client's support with documented evidence (letters, communications).</p>	<p>There is a letter from Aquafarm confirming their intent/policy.</p> <p>ok</p> <p>Intent/policy has been communicated to suppliers and internally.</p>	1		
5.1.4	<p>Indicator: Prior to achievement of 5.1.3, the average FishSource score characterizing the fishery(ies) from which the fishmeal or fish oil is derived. See Appendix V for explanation of FishSource scoring.</p> <p>Requirement: ≥ 6.0 with no individual score < 6.0 or an N/A in the stock assessment category</p> <p>Applicability: All Farms, Unit of Certification Only</p>	<p>Instructions to Clients for Indicator 5.1.4 - FishSource Scores of Feed Species For species from which fishmeal or fish oil is derived, determine FishSource scores as follows: - go to http://www.fishsource.org/ - select "Species" drop down tab to the left and enter relevant species - select the top tab that reads "Scores"</p> <p>a. Record FishSource scores for each species from which fishmeal or fish oil is derived.</p> <p>b. Confirm that average score is ≥ 6.0 with no individual score < 6.0.</p> <p>c. Confirm that there is no 'N/A' in a stock assessment category.</p> <p>d. If the species is not on the website it means that a FishSource assessment is not available. Contact FishSource via Sustainable Fisheries Partnerships to identify the species as a priority for assessment.</p> <p>e. In lieu of FishSource scores, a farm undergoing a first audit may substitute a signed letter of intent from their feed manufacturer stating commitment to provide feed complying with FishSource scoring requirements. However at the second audit, all farms shall demonstrate that they have used feed that complies with the FishSource scoring requirements for a minimum of 6 months.</p>	<p>A. Confirm that client has recorded scores for each species. Repeat FishSource analysis to verify that client obtained an accurate result.</p> <p>B. If any scores is < 6.0 then the feed does not comply with the Requirement. If the average score is < 6.0 then the feed does not comply with the Requirement.</p> <p>C. If an 'N/A' appears in the sock assessment category then the feed does not comply with the Requirement.</p> <p>D. If the species does not have a FishSource score then the fish feed does not comply with the Requirement.</p> <p>E. Verify that client has manufacturer's letter of intent as applicable to first audits. Thereafter, client must demonstrate that all feeds used are in compliance with the Requirement.</p>	<p>NA, FS score not calculated, but letter of intent issued.</p> <p>NA, FS score not calculated, but letter of intent issued.</p> <p>NA, FS score not calculated, but letter of intent issued.</p> <p>NA, FS score not calculated, but letter of intent issued.</p> <p>It is clear that the intent/policy is real and is being implemented, however, the letter from the feed supplier is still according to the old manual.</p>	1		

Criteria 5.2 Criteria: Preference for better feed manufacturers		Compliance Criteria (Required Client Actions):	Auditor Evaluation (Required CB Actions):			
5.2.1	<p>Indicator: Timeframe for producers to provide evidence of preferential sourcing of feed products from feed manufacturers that have a sustainable sourcing policy for feed ingredients, and traceability of feed ingredients</p> <p>Requirement: 2 years following the date that the ISRTA are published</p> <p>Applicability: All Farms, Unit of Certification Only</p>	a. Compile a list of all feed suppliers with contact information.	A. Review feed supplier list and cross-check against feed purchases.	<p>The list is given in the operator profile, which coincides which feed purchases viewed during the audit.</p> <p>NA</p> <p>Intent/policy has been communicated to suppliers and internally.</p> <p>Evidence (emails) is available that documents have been requested from all suppliers.</p> <p>Traceability policy is available from all suppliers, however, a sustainability policy is not available for all suppliers. However, a letter of intent is available.</p>	1	
		b. Prepare a letter of intent to preferentially source feed from suppliers who have a traceability and sustainability policy by 19 December 2011 (Audit Reference 9; also see Indicator 5.1.3B).	B. Verify that client has prepared the letter (it must cover traceability; see Indicator 5.1.3B).			
		c. Communicate your organization's policy to each feed supplier.	C. Verify that client communicated policy to feed supplier.			
		d. Request a traceability policy from each feed supplier (or letter of intent to establish one) before 19 December 2011.	D. Verify client requested documents from each supplier.			
		e. Request sustainability policy from each feed supplier (or letter of intent to establish one) before 19 December 2011.	E. Verify client requested documents from each supplier. Auditors shall allow clients one year (until 19 December 2012) to demonstrate full compliance with 5.2.1c-e in accordance with forthcoming ASC guidelines.			
5.3 Criteria: Energy use		Compliance Criteria (Required Client Actions):	Auditor Evaluation (Required CB Actions):			
5.3.1	<p>Indicator: Identification of the energy sources and calculation and verification of total energy used at the culture facility</p> <p>Requirement: Measured in kilojoules/mt fish/year</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>Instructions to Clients for Indicator 5.3.1 - Calculating Total Energy used by Farm</p> <p>Calculate the total energy consumption of the farm over the prior 12-month period by completing the Energy Budget Worksheet (Audit Reference 10). Include all sources of energy consumption on the farm site such as aeration, boat engines, electricity for housing, etc. Do not include off-site energy consumption such as transport of personnel to or from the farm, or transport of fish to or from the farm. Report energy consumption in kilojoules (Note: 1 megajoule = 1,000 kilojoules). The different energy units can be converted to kilojoules using the following website: http://tonto.eia.doe.gov/energyexplained/index.cfm?page=about. Report the grand total energy used as kilojoules/mt fish produced/year.</p>		Energy budget worksheet received.	1	
		a. Complete the Energy Budget Worksheet (Audit Reference 10).	A. Verify that client completed the Energy Budget Worksheet.			
PRINCIPLE 6: MANAGE FISH HEALTH AND WELFARE IN AN ENVIRONMENTALLY RESPONSIBLE MANNER						
6.1 Criteria: Stocked tilapia recovery						
6.1.1	<p>Indicator: Percent recovery of fish stocked in production stages after they have attained a size of 100 grams</p> <p>Requirement: ≥ 65</p> <p>Applicability: All Farms, Unit of Certification Only</p>	<p>Instructions to Clients for Indicator 6.1.1 - Calculating Percent Recovery of Production Stages</p> <p>Calculate the annual percent recovery of fish stocked in production stages after they have attained a size of 100 grams. All steps refer to quantities for the entire preceding 12-month period.</p> <ol style="list-style-type: none"> 1) Stage of production where fish attain an average weight of 100 g (estimated) identified. 2) Estimated loss of fish (#) prior to average size of 100 g being achieved for all production cycles (in ponds, cages, tanks, etc.) for the prior 12-month period. 3) Standing stock of fish (#) after average size of 100 g achieved. 4) The number of fish harvested to market for the 12 month period divided by (#3 above) multiplied by 100 is equal to the percent recovery after 100 g. 5) Average percent recovery for prior 12-month period at grow-out site and verification of calculations from farm records. <p>Note 1: The method presented above is the required formula for calculating annual percent recovery of fish stocked in production stages. It is acknowledged that some farms may have production cycles which make it difficult to accurately collect the information needed to complete this calculation. In such cases, the client may propose to modify the abovementioned formula provided that the client can show such change is justified. Written justification shall be submitted to the CB together with a detailed description of farm production cycles and a complete explanation showing how a modified formula will yield a more accurate calculation of annual percent recovery of fish stocked in production stages. Proposals must be reviewed and approved by the CB before the audit.</p> <p>Note 2: Recovery does not include recruitment of tilapia resulting from reproduction within the culture system.</p>				

		a. Collect 12 months of data on recovery before the first audit.	A. Make sure client has collected 12 months of data on recovery before first audit.	ok, 12 months data is available.		
		b. If the farm proposes to modify the formula for calculating percent recovery, submit written justification to the CB before the first audit.	B. Review justification for using an alternate calculation if applicable.	No modification of formulae submitted to IMO prior to audit. Since it is not feasible to handle the fish in order to obtain a real count before/after stocking or around 100g, the number of fish at 100g are estimated by - using the sampling data to estimate day at 100g - harvest number minus total morts at day fish reach 100g - harvest divided by harvest&morts at day fish reach 100g X 100 This means that any fish lost due to predation, unrecorded deaths (sinking) and escapes, are not accounted for in the calculation of recovery.		1
		c. Calculate percent recovery according to the instructions above.	C. Review calculations and verify that client's production records support the conclusions.	Production data support the calculations and conclusions.		
		-	D. Verify that percent recovery complies with Requirement.	The percent recovery on average only just complies with the requirements. Some individual values are significantly below 65%. This may represent a risk to potential certification, if not addressed.		
6.2 Criteria: Chemicals		Compliance Criteria (Required Client Actions):		Auditor Evaluation (Required CB Actions):		
6.2.1	Indicator: Allowance for the use of chemicals and therapeutants for disease and pest control that are banned in the importing or producing country Requirement: None Applicability: All Farms, Farm-Wide	a. Prepare a list of all chemicals used on the farm in the previous 12 months. [Note: The TAD considers any substance added by the producer to culture system - aside from water and feed - to be a chemical.]	A. Review list. Cross-check against purchases (6.2.2) and health events (6.2.4).	NA, no chemicals used.		
		b. Prepare a list of suppliers of all chemicals or therapeutants used.	B. Review supplier list to identify the country of origin for each chemical.	NA, no chemicals used.		
		c. Prepare a list of all the countries where the product has been exported to in the prior 12-month period.	C. Review list and cross-check against documentary evidence (e.g. sales documents).	NA, no chemicals used.		1
		d. Prepare a list of banned substances for the producing and exporting country and the national authority or regulating body in producing country (contact information required).	D. Review evidence and cross-check against published information.	NA, no chemicals used.		
		e. Maintain records of voluntary and/or mandatory chemical residue testing conducted or commissioned by the farm from prior 12-month period.	E. Verify records.	NA, no chemicals used.		
6.2.2	Indicator: Allowance for the prophylactic use of antibiotics, prior to any evidence of a disease problem Requirement: None Applicability: All Farms, Farm-Wide	a. Maintain records for all purchases of antibiotics (invoices, prescriptions) .	A. Review purchase records and calculate total amount procured by client. Inspect storage area to verify quantities on site.	NA, no antibiotics used.		
		b. Maintain a log of all health related events. For each event record the duration and the requirements for use of antibiotics or therapeutants (see also 6.2.4).	B. Review log of health events to verify that the quantity of antibiotic applied by the client does not suggest prophylactic use.	NA, no antibiotics used.		1
		c. Determine the total amount of antibiotics used in prior 12-month period.	C. Verify total amount of antibiotics used is equal to total amount prescribed.	NA, no antibiotics used.		

6.2.3	<p>Indicator: Minimum hold time required before any water in which fish have been fed with feed containing methyl or ethyl testosterone can be released</p> <p>Requirement: ≥ 48 hours</p> <p>Applicability: All Farms, Farm-Wide</p>	<p><i>This indicator applies only to farms where the hatchery is located at the grow-out site (e.g. the grow-out facility owns and operates the hatchery) and where the hatchery discharges into the receiving waters. During the holding period, there shall be no risk of exposure of humans or livestock to methyl or ethyl testosterone.</i></p>				
6.2.4	<p>Indicator: Health records proving all therapeutants were used or are being used as prescribed by a veterinary or accredited fish health professional</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. Hatchery facility must have the capacity to retain any water that contains hormones for sex reversal for a period of ≥ 48 hours .</p>	<p>A. Inspect hatchery to verify effectiveness of the systems to retain any water that contains hormones for sex reversal.</p>	<p>Hatchery is based in different location and with different receiving waters, however, it also belongs to the Aquafarm group and will be audited together with the Wunut farm audit.</p>	1	
6.2.5	<p>Indicator: Calculation and verification of the total amount of each antibiotic (active ingredient) used per mt fish produced per year.</p> <p>Requirement: Measured in kilograms of active ingredient of individual antibiotic/mt of fish produced/year</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. Keep a record of all therapeutants used for prior 12-month period.</p> <p>b. Maintain all prescriptions for therapeutants for prior 12-month period.</p> <p>c. If prescriptions are made by health professionals who are not veterinarians, obtain evidence of competency (e.g. accreditation) in the diagnosis of fish disease and drug therapy.</p>	<p>A. Review record of therapeutant usage.</p> <p>B. Verify that therapeutants were used only under prescription.</p> <p>C. If a non-vetrenarian wrote prescriptions, confirm that the individual is qualified as an accredited fish health professional.</p>	<p>NA, no therapeutants used, however, vet is contracted.</p> <p>NA, no therapeutants used, however, vet is contracted.</p> <p>NA, no therapeutants used, however, vet is contracted.</p>	1	
6.3	Criteria: Mortalities	Compliance Criteria (Required Client Actions):	Auditor Evaluation (Required CB Actions):			
6.3.1	<p>Indicator: Presence of records demonstrating that fish mortalities are removed consistently on a minimum daily basis</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Unit of Certification Only</p>	<p>a. Ensure that fish mortalities are removed from cultures on a daily basis.</p> <p>b. Maintain records of daily removals of fish mortalities.</p>	<p>A. Do site inspection to confirm there are no dead fish in cultures whose advanced state of decomposition would suggest mortality is > 1 day.</p> <p>B. Verify client's records show daily removals of fish mortality for prior 12-month period.</p>	<p>Farm visit and worker interviews confirm that dead fish are removed on a daily basis.</p> <p>Records available.</p>	1	
6.3.2	<p>Indicator: Evidence proving acceptable disposal of dead fish, (i.e., landfill receiving receipts, sales receipts, permits or approvals for onsite burial, and assurance if converted to animal meals not destined for the culture of tilapia)</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. Prepare a farm policy that addresses all requirements of the Standard in regards to the acceptable disposal of dead fish.</p> <p>b. Maintain records of mortality disposals as evidence of compliance.</p>	<p>A. Review policy to verify it addresses all requirements of 6.3.2 of the Standard.</p> <p>B. Review disposal records to verify compliance.</p> <p>C. Do site inspection to confirm that farm policy towards mortality is implemented and mortality records are accurate.</p>	<p>Policy available and it contains all points required.</p> <p>Collected every day and sent to local consumption and poultry feedmill. Deadfish record in the office is different from every daily deadfish record.</p> <p>Need more evidence to prove that all deadfish go to local consumption and poultry feed mill.</p>	1	

6.4 Criteria: Fish health management		Compliance Criteria (Required Client Actions):	Auditor Evaluation (Required CB Actions):			
6.4.1	Indicator: Presence and evidence of implementation of a fish health plan that is site-specific and contains effective methods for 1) Protecting the farm from introduction of pathogens, 2) Preventing the spread of pathogens within the farm and to the receiving waters and 3) Reducing the potential for development of disease resistance by ensuring responsible therapeutant use Requirement: Yes Applicability: All Farms, Farm-Wide	a. Prepare a fish health plan that addresses all requirements of the Standard, including: 1) Protecting the farm from introduction of pathogens, 2) Preventing the spread of pathogens within the farm and to the receiving waters, and 3) Reducing the potential for development of disease resistance by ensuring responsible therapeutant use	A. Review fish health plan to verify it addresses all requirements of Indicator 6.4.1 of the Standard and that the plan is site-specific.	A veterinary health plan is available according to Globalgap requirements and cover all points of the ASC standard. The plan was developed for this site specifically. The plan was signed 14 September 2011 by the vet specialist. Worker and staff interviews confirmed that the vhp is well implemented and understood.	1	
		b. Obtain review and written approval of the fish health plan by the farm's veterinarian or health professional.	B. Confirm that the farm's veterinarian or health professional has reviewed and approved the fish health plan.			
		-	C. Do site inspection to verify that fish health plan is effectively implemented and understood by farm staff.			
Total				35	7	2



criteria	recomen-dation	minor NC	major NC	NC	action plan	deadline	action plan approved by IMO	status
7.5.2			1	<u>Weekly rest</u> It was noted from review of records and employee interviews that the facility had not enforced one day of weekly rest in case employees elected to trade resting days amongst each other to attend to any urgent personal business.	corrective measure implemented		na	done
7.8.1		1		<u>Corrective action plan for unintended problems</u> Although procedure for complaint handling exists, the facility did not have an internal management system to verify follow-up on social issues and the internal monitoring of labor activities through works committee, internal audits and management review meetings, to ensure efficiency of corrective actions implemented.	see report	see report	ok	open
7.8.2		1		<u>Emergency program</u> It was noted from review of records, employees interview and interaction with facility management that the facility not prepared the emergency preparedness program for natural disasters like earthquake, storms etc.	see report	see report	ok	open
7.8.3		1		<u>Complaints</u> No records of complaint cases, related actions and resolution maintained as well as worker evaluation of the resolution, because no complaint were raised (declaration from farm). This has to be demonstrated.	see report	see report	ok	open
Total	0	3	1					

Scope: Species of the Family Cichlidae commonly referred as Tilapia (*Oreochromis niloticus*, *O. mossambica*, *O. aureus* and *O. hybrids*)

add "1" per criteria in applicable column below

Social requirements of this Standard shall be audited by an individual who is a lead auditor in conformity with SAAS Procedure 200 section 3.1.
(See ASC Farm Certification and Accreditation Requirements)

PRINCIPLE 7. BE SOCIALLY RESPONSIBLE

7.1 Criteria: Child labor **Compliance Criteria:**

7.1.1	<p>Indicator: Number of incidences of child^[8] labor^[9]</p> <p>Requirement: 0 (zero)</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. Minimum age of permanent workers is 15 or older (per national legal minimum age). b. System exists to monitor hours and conditions of young workers and light work by children. c. Young workers (from 15 to less than 18): have no conflicts between work and schooling; do not spend more than 10 hours/day on transportation time, school and work; do not perform hazardous work. d. Equal treatment for children of migrant workers.</p>
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It was noted from review of policy ,interaction with facility management and employees interview that the facility had the policy to recruit only the person who completed 18 years.

Further it was noted through physical appearance there was no evidence of child or young workers in the facility at the time of audit.

Moreover the facility maintained photocopy of Regional identity cards, Family identity cards and School certificates(Mark sheet and Transfer Certificate) as age proof record of their employees.

No migrant employees engaged in the facility.

1

Footnote ^[8] A "child" is defined as any person less than 15 years of age. A higher age would apply if the minimum age law stipulates a higher age for work or mandatory schooling. If, however, the local minimum age law is set at 14, in accordance with developing country exceptions under ILO Convention 138, the lower age will apply.

Footnote 10 ^[9] "Child labor" is defined as any work by a child younger than the age specified in the definition of a child, except for light work as provided for by ILO Convention 138, article 7.

7.2 Criteria: Forced, bonded, compulsory labor **Compliance Criteria:**

7.2.1	<p>Indicator: Number of incidences of forced^[10], bonded^[11] or compulsory labor</p> <p>Requirement: 0 (zero)</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. Contracts clearly stated and understood by employees, no 'pay to work' schemes through labor contractors or training credit programs. b. Employees free to leave workplace and manage their own time. c. Employer does not withhold employee's original identity papers. d. Employer shall not withhold any part of workers' salaries, benefits, property or documents in order to oblige them to continue working for employer. e. Employees not to be obligated to stay in job to repay debt.</p>
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It was noted from review of the policy ,interaction with facility management and employees interview that the facility not with held their employees original identity papers,salaries and benefits.

Further all interviewed employees confirmed that they can leave from the facility without any restriction and all the overtime work is performed on voluntary basis.

Moreover there was are labor contractors or trainees working in the facility which was confirmed through employees interview,management interview and records review.

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Footnote ^[10] "Forced (compulsory) labor" is defined as all work or service that is extracted from any person under the menace of any penalty for which a person has not offered him/ herself voluntarily or for which such work or service is demanded as a repayment of debt. "Penalty" can imply monetary sanctions, physical punishment, or the loss of rights and privileges or restriction of movement (e.g., withholding of identity documents).

Footnote ^[11] "Bonded labor" is defined as when a person is forced by the employer or creditor to work to repay a financial debt to the crediting agency.

7.3 Criteria: Discrimination in the work environment **Compliance Criteria:**

7.3.1	<p>Indicator: Number of incidences of discrimination^[12]</p> <p>Requirement: 0 (zero)</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. Written anti-discrimination policies in place, stating that the company does not engage/support in discrimination in hiring, remuneration, access to training, promotion, termination or retirement based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, age or any other condition that may give rise to discrimination. b. Worker testimony supports that the company does not interfere with the rights of personnel to observe tenets or practices, or to meet needs related to race, caste, national origin, religion, disability, gender sexual orientation, union membership, political affiliation or any other condition that may give rise to discrimination. Records indicate objective mechanisms for employee reviews and the offering of promotion and training opportunities. c. Company has a policy in place protecting pregnant and lactating mothers. d. Company has a policy in place against HIV discrimination.</p>
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It was noted from review of policy and employees interview that the facility had not discriminated against any employees in any situation in terms of caste, religion etc. No issues noted during the time of audit.

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Footnote	¹²⁾ "Discrimination" is defined as any distinction, exclusion, or preferences, which has the effect of nullifying or impairing equality of opportunity or treatment. Not all distinction, exclusion, or preference constitutes discrimination. For instance, a merit- or performance-based pay increase or bonus is not by itself discriminatory. Positive discrimination in favor of people from certain underrepresented groups may be legal in some countries.				
7.3.2	<p>Indicator: Evidence of proactive anti-discrimination practice</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. Verification of clear and transparent company procedures are outlined to raise, file, and respond to discrimination complaints.</p> <p>b. All managers and supervisors receive training on diversity and non-discrimination. All personnel receive non-discrimination training. Internal or external training acceptable if proven effective.</p> <p>c. Comparison of workforce diversity with demographics of host community updated regularly by management.</p>	No deviations were noted and there was no evidence of discrimination. The facility had a clear policy for discrimination and all the employees were aware of the same.	1	
7.4 Criteria: Health and safety of workers		Compliance Criteria:			
7.4.1	<p>Indicator: Percentage of workers trained in health and safety practices/ procedures/ policies</p> <p>Requirement: 100 %</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. Minimization of hazards/risks in the working environment, including documented systemic procedures and policies to prevent workplace hazards and their risks, shall exist and the information shall be available to employees.</p> <p>b. Emergency response procedures shall exist and be known by employees.</p> <p>c. Health and safety training for all employees conducted on a regular basis (once a year and immediately for all new employees), including training on potential hazards and risk minimization.</p> <p>d. Potentially dangerous chemicals are stored properly and as prescribed.</p>	It was noted from review of records and employee interviews that the facility provided an emergency preparedness program with respect to fire safety and first aid to their employees in which the records are evidenced and verified. The employees were also aware of the program.	1	
7.4.2	<p>Indicator: Percentage of health- and safety-related accidents and violations recorded and mitigated through corrective actions</p> <p>Requirement: 100 %</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. Documentation is generated with regards to occupational health and safety violations.</p> <p>b. Corrective action plan are implemented in response to accidents that have occurred. This should include: analysis of the root causes, address the root causes, remediate and prevent future accidents of similar nature.</p> <p>c. Workers involved in departments where accidents have occurred can explain what analysis has been done and what steps taken/improvements made.</p>	It was noted from review of records that the facility had conducted the risk assessment with respect to their process to identify health hazards. The procedure also defined to rectify the same.	1	
7.4.3	<p>Indicator: Employer responsibility and proof of insurance (accident/ injury) for employee costs in a job-related accident or injury when not covered under national law</p> <p>Requirement: 100 %</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. Documentation maintained by management confirms that all personnel are provided sufficient insurance to cover annual check-ups and costs related to occupational accidents or injuries. Equal insurance coverage must include temporary, migrant or foreign workers.</p>	It was noted from review of records and employees interview that the facility provided social insurance to all the employees.	1	
7.5 Criteria: Wages, overtime and working hours		Compliance Criteria:			
7.5.1	<p>Indicator: The percentage of employees who are paid fair and decent wages</p> <p>Requirement: 100 %</p> <p>Applicability: All Farms, Farm-Wide</p>	<p><i>Applicable to employees, workers and contractors</i></p> <p>a. Employers/Managers understand and have policies to ensure the principle of equal pay for equal work.</p> <p>b. Employers ensure wages paid for a standard working week (no more than 48 hours) always meet, at least, legal/industry minimum standards, cover basic needs of personnel and provide some discretionary income.</p> <p>c. Labor conflict resolution policy in place to track conflicts & complaints raised, and responses to conflicts & complaints.</p> <p>d. Ratio of lowest wage rate to basic needs wage always exceeds 100%.</p> <p>e. Proof of employer engagement with workers and their representative organizations, and use of cost of living assessments from credible sources to assess basic needs wages.</p>	<p>It was noted from review of records and interaction with employees that the facility paid the applicable minimum wages which covered basic needs of personnel as well as some discretionary income.</p> <p>It was noted from review of records that the facility paid wages above the applicable minimum wage and above the calculated Basic Need wages (BNW) for this region.</p> <p>It was noted from review of records and employees interview that the facility provided social insurance to all the employees.</p>	1	
7.5.2	<p>Indicator: Incidences of abuse of working hours and/or overtime laws</p> <p>Requirement: 0 (zero)</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. No deductions in pay for disciplinary actions.</p> <p>b. Wage and benefits are clearly articulated to employees and rendered to employees in a convenient manner; e.g. no need to travel to collect benefits, no promissory notes, coupons or merchandise; payment in cash or check.</p> <p>c. Labor-only contracting¹³⁾ or false apprenticeship schemes¹⁴⁾ are not accepted, including: revolving/consecutive labor contracts used to deny benefit accrual.</p> <p>d. Clear, transparent mechanism for wage setting known to employees.</p> <p>e. Employer shall comply with applicable laws and industry standards related to working hours. "Normal workweek" can be defined by law but shall not on a regular basis (constantly of majority of the time) exceed 48 hours. Only if allowed by law, variations (to the 48-hour regular work week) based on seasonality may apply.</p> <p>f. Personnel shall be provided with at least on day off in every seven day period.</p> <p>g. All overtime shall be paid at a premium and should not exceed 12 hours per week.</p> <p>h. Overtime work shall always be voluntary.</p>	<p>It was noted from review of records and employee interviews that the facility had not enforced one day of weekly rest in case employees elected to trade resting days amongst each other to attend to any urgent personal business.</p> <p>Moreover it was noted from review of records and interaction with employees interview that the facility not paid the overtime hours in premium rate to their 10 daily rated casual employees instead that paid the normal rate of wages. However the permanent employees were paid at a premium rate for overtime work.</p>	1	
Footnote	¹³⁾ Labor-only contracting arrangement: The practice of hiring workers without establishing a formal employment relationship for the purpose of avoiding payment of regular wages or the provision of legally required benefits, such as health and safety protections				
Footnote	¹⁴⁾ False Apprenticeship Scheme: The practice of hiring workers under apprenticeship terms without stipulating terms of the apprenticeship or wages under contract. It is a "false" apprenticeship if its purpose is to underpay people, avoid legal obligations, or employ children.				

7.6 Criteria: Freedom of association and right to collective bargaining		Compliance Criteria:				
7.6.1	<p>Indicator: Incidences of employees denied freedom to associate, ability to bargain collectively¹⁵³ or denied access to representative(s) chosen by workers</p> <p>Requirement: 0 (zero)</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. Workers have the freedom to form and join any trade union, free of any form of interference from employers or competing organizations set up or backed by the employer. ILO specifically prohibits "acts which are designated to promote the establishment of worker organizations or to support worker organizations under the control of employers or employers' organizations.</p> <p>b. Local trade union, or where none exists a reputable civil-society organization, confirms no outstanding cases against the employer for violations of employees' freedom of association and collective bargaining rights.</p> <p>c. Trade union representatives have access to their members in the workplace at reasonable times on the premises.</p> <p>d. Explicit communications from the employer about their commitment to freedom of association and collective bargaining rights of all.</p> <p>e. If trade unions exist, they are able to access/inform all workers directly (posters, pamphlets, visits).</p>	<p>It was noted from review of records and employees interview that the facility had a trade union SBSI (Serikat Buruh Sejahtera Indonesia) in their facility in which the employees are able to raise their concerns and grievances at any time. No issues had been raised at the time of the audit.</p>	1		
Footnote	¹⁵³ "Bargain collectively" is defined as a voluntary negotiation between employers and organizations of workers in order to establish the terms and conditions of employment by means of collective (written) agreements.					
7.7 Criteria: Disciplinary Actions		Compliance Criteria:				
7.7.1	<p>Indicator: Incidences of abusive disciplinary actions</p> <p>Requirement: 0 (zero)</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. There is never any use of or support for (e.g. subcontractors using) corporal punishment, mental or physical coercion, or verbal abuse.</p> <p>b. Fines or wage deductions shall not be acceptable as a method for disciplining workers (indicated by policy statements, as well as evidence from worker testimony).</p>	<p>There was no evidence that employee are subjected to any corporal punishment, verbal abuse or any physical and mental coercion. Further it was noted from employee interviews and review of policy that the facility had not made any wage deductions in order to discipline the workers.</p>	1		
7.7.2	<p>Indicator: Evidence of non-abusive disciplinary policies and procedures</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. Procedures exist for situations in which disciplinary action is required, and they establish the use of progressive verbal and written warnings. Aim should always be to improve the worker before letting him/her go (indicated by policy statements as well as evidence from worker testimony).</p>	<p>The facility had a clear policy if disciplinary actions are required. As per their policy first they will give oral warning to their employees and after that written warning will be given to their employees. Moreover all the disciplinary actions will be taken as per national regulations.</p> <p>However it was noted from employee interviews that no such kind of oral warning and written warning issued to their employees so far. No disciplinary actions taken so far against any of the employee.</p>	1		
7.8 Criteria: Action response plans/policies		Compliance Criteria:				
7.8.1	<p>Indicator: Evidence of implementation of a corrective action plan (updated annually) that addresses unintended problems associated with labor relations and internal monitoring of labor activities</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. Copy of corrective action plan for prior 12-month period (first audit requires previous 3-month period) and employer testimonial that these plans have been implemented.</p> <p>b. Workers are aware of the action plans and their results.</p>	<p>Although procedure for complaint handling exists, the facility did not have an internal management system to verify follow-up on social issues and internal monitoring of labor activities through works committee, internal audits and management review meetings, to ensure efficiency of corrective actions implemented.</p> <p>A trade union exists in the facility.</p>	1		
7.8.2	<p>Indicator: Evidence of implementation of an emergency action plan and annual (or more frequent) internal monitoring activities</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. Copy of emergency (examples include earthquakes, fires, storms, etc.) action plan for prior 12-month period (first audit requires previous 3-month period) and employer testimonial that these plans have been implemented.</p> <p>b. Worker competency in the appropriate actions required during an emergency response.</p>	<p>It was noted from review of records, employees interview and interaction with facility management that the facility had not prepared the emergency preparedness program for natural disasters like earthquake, storms etc.</p>	1		
7.8.3	<p>Indicator: Evidence of implementation of a verifiable conflict resolution policy for conflicts and complaints tracked transparently, and proof that conflicts and complaints from employees are responded to within three months after being received</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. Copy of conflict resolution policy for prior 12-month period (first audit requires previous 3-month period) and employer testimonial that this plan has been implemented.</p> <p>b. Three month time-frame from employee conflict filing and response upheld.</p> <p>c. Records of complaint cases, related actions and resolution maintained as well as worker evaluation of the resolution.</p> <p>d. Worker actions and testimony confirms they understand this process and are comfortable raising complaints.</p>	<p>No records of complaint cases, related actions and resolution maintained as well as worker evaluation of the resolution, because no complaint were raised (declaration from farm).</p>	1		
7.9 Criteria: Living conditions for employees		Compliance Criteria:				
7.9.1	<p>Indicator: Evidence that living conditions are clean, sanitary and safe for habitation</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. Evidence that potable/safe drinking water available.</p> <p>b. Evidence that sanitary conditions for disposal of human waste are in practice.</p> <p>c. Evidence that human waste is not discharged into the environment.</p> <p>d. Employee housing is constructed of material to sustain local conditions in the event of storms or other natural events that could endanger lives.</p>	<p>No dormitory or housing facility is provided to the employees. Bottled water is supplied to employees.</p>	1		

7.10 Criteria: Community relations and interaction		Compliance Criteria:				
7.10.1	<p>Indicator: Evidence that farms are not inhibiting or restricting local community access to public land, freshwater resources or public fishing grounds</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	a. Testimonials from surrounding community members that farms have not blocked access to public property or public natural resources.	No community related issues noted.	1		
7.10.2	<p>Indicator: Evidence of implementation of a verifiable conflict resolution policy for conflicts and complaints tracked transparently, and proof that conflicts and complaints from communities are responded to within three months after being received</p> <p>Requirement: Yes</p> <p>Applicability: All Farms, Farm-Wide</p>	<p>a. Verification of community conflict resolution policy and actions for prior 12-month period (first audit requires previous 3-month period) and community testimonials that this plan has been implemented and there is a shared understanding of procedures for filing complaints.</p> <p>b. Three month time-frame from community member conflict filing and response evidenced by community testimonials.</p> <p>c. Verification that farm management communicates with the community on the impact of its activities.</p> <p>d. If environmental impact assessment has been performed, it is made easily accessible to community members.</p> <p>e. If a socio-economic impact assessment has been performed, it is made easily accessible to community members.</p> <p>f. Economic impacts of the farm activities reported – at least annually – to the community.</p>	No community related issues noted.	1		
Total				14	3	1