

**Filled in by client/auditor**  
(mark red what is applicable)

**Name: Sølvi Skare**

**Company: Bureau Veritas Certification**

**Date: 19.5.2014**

**AUDIT MANUAL - ASC Freshwater Trout Standard**

Scope: rainbow trout (*Oncorhynchus mykiss*) or any other salmonid grown in fresh water



244 0 9 79 332

**PRINCIPLE 1: COMPLY WITH ALL NATIONAL AND LOCAL LAWS AND REGULATIONS**

**CONFIRMITY**

**COMMENTS - RATIONALE**

**Criterion 1.1 Operate within the legal framework of national and local laws and regulations that are applicable and current**

|       |  | <b>Compliance Criteria (Required Client Actions):</b>   |   | <b>Auditor Evaluation (Required CAB Actions):</b> |  | <b>C</b> | <b>Major NC</b> | <b>Minor NC</b> | <b>NA</b>  |   |
|-------|--|---|---|---|--|----------|-----------------|-----------------|--|---|
| 1.1.1 | <b>Indicator:</b> Presence of documents issued by pertinent authorities indicating compliance with local and national authorities on land and water use<br><br><b>Requirement:</b> Yes<br><br><b>Applicability:</b> All    | a. Maintain copies of key land and water use laws (both local and national) that apply to regulating the environmental and social impacts of aquaculture.   | A. Confirm that the producer has copies of key land and water use laws of direct relevance to aquaculture impacts.  | 1   |  |          |                 |                 |  | Sefro Freshwater Farm has authorization 050MC005 from ASUR Marche, 27.3.2013, from 148/2008, visited and samples taken for analyses last 20.2.2014. |
|       |  | b. Maintain original lease agreements, land titles, or concession permit on file as applicable.   | B. Confirm that the client holds original lease agreements or land titles.  | 1   |  |          |                 |                 |  | Lease agreements for farm seen  |
|       |  | c. Keep records of inspections for compliance with national and local laws and regulations (if such inspections are legally required in the country of operation).  | C. Verify presence of a copy of records of inspections (where such inspections are legally required and paperwork can be provided to producers).  | 1   |  |          |                 |                 |  | Copies of inspections from ASUR Marche, compliant   |
|       |  | d. Obtain permits and maps showing that the farm does not conflict with national preservation areas (see Indicator 2.1.1)   | D. Confirm that the producer has evidence showing that the facility does not conflict with designated preservation areas and has required operational permits if sited in such an area (see 2.1.1). | 1   |  |          |                 |                 |  | Sefro freshwater farm is not situated in protected area, as shown at map from Natura 2000 in Marche   |
| 1.1.2 | <b>Indicator:</b> Presence of documents indicating compliance with tax laws<br><br><b>Requirement:</b> Yes<br><br><b>Applicability:</b> All  | Note: To ensure that all tax-related information for 1.1.2 is available for auditor review, farms may wish to consolidate required documentation prior to the audit (e.g. when files are held at off site facilities such as a head office or accountancy).   |   |   |  |          |                 |                 |  |   |
|       |  | a. Maintain copies of tax laws for jurisdiction(s) where company operates.  | A. Verify presence of a copy of tax laws.   | 1   |  |          |                 |                 |  | Tax verified input twice per year   |
|       |  | b. Maintain records of tax payments to appropriate authorities (e.g. land use tax, water use tax, revenue tax). Note that CABs will not disclose confidential tax information unless client is required to or chooses to make it public.  | B. Verify that the client has records of tax payments to the appropriate authorities. Do not disclose client tax information which is confidential.   | 1   |  |          |                 |                 |  | Tax payments registered in agency input   |
| 1.1.3 | <b>Indicator:</b> Presence of documents indicating compliance with all labor laws and regulations<br><br><b>Requirement:</b> Yes<br><br><b>Applicability:</b> All  | c. Register with national or local authorities as an "aquaculture activity" where such registration is consistent with regulations. Maintain copies of registration documents and the contact details for relevant authorities.   | C. Verify that the client is registered with local or national authorities.   | 1   |  |          |                 |                 | Sefro Freshwater Farm is registered in Marche Azienda Sanitaria Unica Regionale 050MC005   |   |
|       |  | Note: Indicator 1.1.3 is restricted in scope and applies only to those farm sites within the unit of certification.   |   |   |  |          |                 |                 |  |   |
|       |  | a. Maintain copies of key labor laws and regulations that are applicable to regulating the social impacts of aquaculture.   | A. Confirm that the producer has copies of key labor laws and regulations of direct relevance to social impacts of aquaculture.   | 1   |  |          |                 |                 |  | Rapport 27.7.2013 from consultant Pramat, where farm meet requirement for payment to workers and from Igenstudio regarding health of workers        |
| 1.1.4 | <b>Indicator:</b> Presence of documents indicating compliance with regulations or permits concerning water quality impacts, effluent and water abstraction<br><br><b>Requirement:</b> Yes<br><br><b>Applicability:</b> All | 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. Confirm that the client has the specified documentation from the appropriate authorities (where such inspections are legally required and paperwork provided to producers).                      | 1   |  |          |                 |                 | There are not regularly inspections from authorities   |   |
|       |  | a. Maintain copies of key regulations and permitting requirements that apply to water quality impacts, effluent discharge and water abstraction by the farm.  | A. Confirm that the client maintains copies of key regulations and permitting requirements as specified.  | 1   |  |          |                 |                 | Key regulation and permission from authorities   |   |
|       |  | b. Obtain permits for water quality impacts where applicable.   | B. Confirm that the client obtains water quality permits as applicable.   | 1   |  |          |                 |                 | Water permission from authorities, Marche Azienda Sanitaria Unica Regionale 050MC005. In addition to permission for water drilling and use of water from wells from Provincia De Macerata, from 5.8.2011 |   |
|       |  | c. Maintain records of monitoring and compliance with discharge laws and regulations as required.   | C. Verify that records show compliance with discharge laws and regulations.   | 1   |  |          |                 |                 | 1  | see 1.1.4. b  |
|       |  | d. Obtain a statement from local authorities indicating the water abstraction limits (units given) for the farm. If local authorities do not set water abstraction limits for farms operating in the region, obtain a statement from local authorities attesting to this fact.                                | D. Review the water abstraction limits set for the farm by local authorities. If local authorities do not set water abstraction limits, confirm that the farm has an attestation.                   |   |  |          |                 |                 |  | There is not an attestation from authorities for water abstraction  |
|       |  | e. Maintain records of water abstraction.   | E. Verify that the farm keeps complete records of water abstraction.  | 1   |  |          |                 |                 |  | The water abstraction is recorded and followed  |
| 2.1.1 | <b>Indicator:</b> Allowance for siting in National Protected Areas [3]<br><br><b>Requirement:</b> None [4, 5]  | Note: To determine its compliance with the requirements in 2.1, a producer will need documentation that analyzes the farm's siting and surrounding habitats and ecosystems. Documentation can be based on an Environmental Impact Assessment (EIA) or any other credible process of environmental assessment. |   |   |  |          |                 |                 |  |   |
|       |  | <b>Instruction to Clients for Indicator 2.1.1 - Exceptions to Requirements that Farms are not sited in National Protected Areas</b>   |   |   |  |          |                 |                 |  |   |
| 2.1.1 |  | a. Provide a map showing the location of the farm relative to nearby protected areas as defined by national laws (also see 1.1.1e).   | A. Review map of national protected areas and cross-check against farm location.  | 1   |  |          |                 |                 |  | Sefro freshwater farm is not situated in protected area, as shown at map from Natura 2000 in Marche   |
|       |  | b. If the farm is not sited in a protected area as defined above, inform the CAB. In this case, the requirements of 2.1.1c-d do not apply.  | B. If the farm is not sited in a protected area, make note of this fact in the audit report. Otherwise proceed to 2.1.1c.   | 1   |  |          |                 |                 |  | See 2.1.1   |

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|--|---|---|---|---|--|--|--|---|---|
|  | <p><b>Applicability:</b> All except as noted in [4] and [5]</p>   | <p>c. If the farm is sited in a protected area, review the Instructions for Indicator 2.1.1 (above) to determine if the farm is allowed an exception to the requirements. If yes, inform the CAB which exception (#1 or #2) is allowed and provide supporting evidence.</p> <p>d. If the farm is sited in a protected area and the exceptions provided for Indicator 2.1.1 do not apply, then the farm does not comply with the requirement and is ineligible for ASC certification.</p>  | <p>C. Review the applicability of the exception requested by the farm together with the supporting evidence to determine if the farm is eligible. If yes, Indicator 2.1.1 is not applicable.</p> <p>D. Review evidence to determine whether the farm is allowed to be sited in a protected area and hence eligible for ASC certification.</p>   |   |  |  |  | 1 |   |
| Footnote   | [3] A protected area is "a clearly defined geographical space, recognized, dedicated and managed through legal or other effective means, to achieve the long-term conservation of nature with associated ecosystem services and cultural values." Source: Dudley, N. (Editor) (2008), Guidelines for Applying Protected Area  |   |   |   |  |  |  |   |   |
| Footnote   | [4] An exception is made for protected areas that are classified by the International Union for Conservation of Nature (IUCN) as Category V or VI. These are areas preserved primarily for their landscapes, or areas that include sustainable resource management. Details can be found here:  |   |   |   |  |  |  |   |   |
| Footnote   | [5] An exception is also made for farms located in protected areas that are designated as such after the farm already was established in that location. In these situations, the farm must demonstrate that its operation is compatible with the objectives of the protected area, and that it is in compliance with any relevant   |   |   |   |  |  |  |   |   |
| 2.1.2  | <p><b>Indicator:</b> Conversion of wetlands [6] after 1999</p> <p><b>Requirement:</b> None [7]</p> <p><b>Applicability:</b> All except as noted in [7]</p>  | <p>Note: An exception to Indicator 2.1.2 is allowed where conversion of wetlands is for water use (e.g., canals for inlets and outlets). Converted surface area must be offset by restoration of 100% of the equivalent area of functional wetlands with the same</p> <p>a. Provide documentary evidence showing all construction or habitat conversion on the farm since 1999.</p> <p>b. Provide a map delineating all wetlands (as defined in [6]) currently within a 5-km radius of the farm.</p> <p>c. Prepare a map showing wetland coverage in 1999 at the farm site.</p>   | <p>A. Review evidence for date of all construction or habitat conversion on the farm since 1999.</p> <p>B. Evaluate whether there is evidence for any wetland conversion occurring within a 5-km radius of the farm since 1999.</p> <p>C. If evidence shows that current farm siting or related activities have resulted in loss of wetland habitat since 1999, then the farm is not certifiable.</p>   |   |  |  |  | 1 | No wetland  |
| Footnote   | [6] Wetland: Generally, wetlands are 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. Wetlands generally include swamps, marshes, bogs and fens (U.S. Environmental Protection Agency).   |   |   |   |  |  |  |   |   |
| Footnote   | [7] Exception: Conversion of wetlands for access to water (e.g., canals for inlets and outlets): Converted surface area must be offset by restoration of 100% of the equivalent area of functional wetlands with the same habitat characteristics.  |   |   |   |  |  |  |   |   |
| 2.1.3  | <p><b>Indicator:</b> An assessment of the presence on the farm of species listed on the International Union for Conservation of Nature (IUCN) "Red List of Threatened Species" as vulnerable, near threatened, endangered or critically endangered; an evaluation of the farm's impact on any such species present; and clearly defined mitigation measures to reduce any negative impacts and allow existence of such species</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>  | <p><b>Instruction to Clients for Indicator 2.1.3 - Assessment of Impacts to IUCN Red Listed Species</b></p> <p>a. Perform above analysis. Record all IUCN red listed species and farm-related threats. Farm commissions qualified academic ecologist or environmental consultant to perform onsite survey for species listed in farm analysis.</p> <p>b. Provide a map showing location of the farm (see 1.1.1e) relative to the known distribution of IUCN red-listed species (categories as defined in the indicator) or critical habitats in the area.</p> <p>c. If results from 2.1.3a (above) identify that IUCN Red List species occur within a 5 km radius of the farm (including upstream and receiving waters), provide a documented evaluation of the farm's impacts on such species.</p> <p>d. Where the results from 2.1.3c indicate a potential for negative impacts, prepare a set of written and clearly-defined mitigation measures to reduce any negative impacts and allow existence of such species.</p> | <p>A. Review credentials of expert who performed onsite survey and report. Verify through interviews with relevant stakeholders (e.g. local community, eNGOs, government agency responsible for wildlife protection), in order to cross-check whether endangered species exist in the immediate vicinity of the farm.</p> <p>B. Review the map and verify that client is aware of IUCN red-listed species (categories as defined in the indicator) or critical habitats located near the farm.</p> <p>C. Verify that client has performed an evaluation of farm impacts to IUCN Red Listed species (as applicable).</p> <p>D. Confirm that the farm has documented all mitigation measures and verify implementation during the on-site inspection (as applicable).</p> | 1 |  |  |  | 1 | There is no IUCN listed animals as seen from rapport and map from Igenstudio, environmental consultant  |
|  |   |   |   | 1 |  |  |  |   | See 2.1.3   |
|  |   |   |   |   |  |  |  | 1 |   |
| <b>Criterion 2.2 Riparian buffer zones [8]</b>           |   |   |   |   |  |  |  |   |   |
| <b>Compliance Criteria (Required Client Actions):</b>    |   |   | <b>Auditor Evaluation (Required CAB Actions):</b>   |   |  |  |  |   |   |
| Footnote   | [8] Riparian buffer zone is the land immediately abutting a water body.   |   |   |   |  |  |  |   |   |
| 2.2.1  | <p><b>Indicator:</b> For new farms installed on land after publication of the ASC Freshwater Trout Standard (or for significant expansions), minimum buffer zone between the farm and an adjacent water body in which there is no farm infrastructure that might impede wildlife's access to the water, except for inflow and outflow systems</p> <p><b>Requirement:</b> ≥ 15 meters from the water's edge [9]</p> <p><b>Applicability:</b> All farms constructed after publication of the ASC Freshwater Trout Standard except as noted in [9]</p> | <p>Note: An exception is made if the farm can demonstrate through a third-party scientific analysis that the farm's structures do not impede animal habitats and corridors and do not present erosion risks [9].</p> <p>a. Inform the CAB of the date when farm installation was originally completed and any farm expansions thereafter (also see 2.1.2a).</p> <p>b. If farm installation was completed before publication of the ASC Freshwater Trout Standard, then indicator 2.2.1 does not apply. Otherwise proceed to 2.2.1c.</p> <p>c. Prepare a diagram of the farm showing the siting and dimensions of buffer zones between the farm and adjacent water body.</p> <p>d. Ensure that buffer zones are free of farm infrastructure (rescue and safety equipment is allowed as appropriate to ensure worker health and welfare).</p>   | <p>A. Review evidence for date of farm installation and expansions.</p> <p>B. Determine whether Indicator 2.2.1 is applicable to the farm.</p> <p>C. Review diagram to verify that siting of buffer zones is appropriate and that the farm does not impede wildlife's access to the water.</p> <p>D. During the on-site visit, inspect buffer zones to verify appropriate siting and dimensions.</p>  | 1 |  |  |  | 1 | Sefro Farm has existed since 1947 the farm has later in 1970 and 1990 been rebuild in same area as original   |
| Footnote   | [9] An exception is made if the farm can demonstrate through a third-party scientific analysis that the farm's structures do not impede animal habitats and corridors and do not present erosion risks.   |   |   |   |  |  |  |   |   |
| <b>Criterion 2.3 Introduction of exotic species [10]</b> |   |   |   |   |  |  |  |   |   |
| <b>Compliance Criteria (Required Client Actions):</b>    |   |   | <b>Auditor Evaluation (Required CAB Actions):</b>   |   |  |  |  |   |   |
| Footnote   | [10] The ASC Freshwater Trout Standard defines "exotic species" as non-native animals living in areas outside their native boundaries.  |   |   |   |  |  |  |   |   |
|  |   | <p>Note: Indicator 2.3.1 does not apply to farms that operate closed production systems. A closed production system is defined as a facility with recirculating water that is separated from the wild aquatic medium by effective physical barriers that are in</p> <p>a. Inform the CAB if the farm uses a closed production system according to the above definition (indicator 2.3.1 does not apply). Otherwise, proceed to 2.3.1b.</p>  | <p>A. Determine which type of culture system is used by the farm. If closed, then 2.3.1 does not apply (response "n/a"). Otherwise, proceed to 2.3.1b.</p>  | 1 |  |  |  |   | The farm is a production system, with separation between river and farm, by gratings as physical barriers in addition to implemented procedures for control of barriers |

|   |  |  |  |   |  |   |   |             |
|---|--|--|--|---|--|---|---|-------------|
| 2.3.1   | <p><b>Indicator:</b> New introductions of exotic trout after the date of publication of the ASC Freshwater Trout Standard, unless in a closed production system [11]</p> <p><b>Requirement:</b> None</p> <p><b>Applicability:</b> All except closed production systems</p>   | <p>b. Inform the CAB which trout species is being cultured by the farm and maintain purchase records (e.g. receipts) that identify the species by Latin name.</p>  | B. Confirm which species of trout is cultured by the farm.   | 1 |  |   | The trout produced is <i>Oncorhynchus mykiss</i>  |             |
|   |  | <p>c. Compile available primary literature (e.g. scientific studies, government publications) to determine whether or not the cultured species is generally considered to be native to the region in which the farm operates.</p>  | C. Review the literature to determine if the cultured species is generally considered native to the area. If yes, then 2.3.1 does not apply (response "n/a"). Otherwise, proceed to 2.3.1D.  | 1 |  |   | The rainbow trout ( <i>Oncorhynchus mykiss</i> ) is a species of salmonid native to cold-water tributaries of the Pacific Ocean in Asia and North America. The species has been introduced to freshwater farms for more than 100 years ago, so far there has not been possibilities for reproducing outside the farm activities |             |
|   |  | <p>d. If the species is considered non-native but was previously established in the area (i.e. if it is an introduced species), search the literature for a reliable estimate of the year of introduction.</p>   | D. If the species is not considered native to the area, review available information to determine if it was introduced and had self-sustaining population established in the wild before publication of the ASC Freshwater Trout Standard (7 February 2013). If yes, then 2.3.1 does not apply (response "n/a"). Otherwise, proceed to 2.3.1E. |   |  | 1 |   |             |
|   |  | <p>e. Inform the client that the proposed culture stock is considered an 'exotic trout' under the ASC Freshwater Trout Standard and therefore the farm is ineligible for certification.</p>  | E. Inform the client that the proposed culture stock is considered an 'exotic trout' under the ASC Freshwater Trout Standard and therefore the farm is ineligible for certification.   |   |  | 1 | The rainbow trout ( <i>Oncorhynchus mykiss</i> ) is not introduced after the publication of ASC Freshwater trout standard   |             |
| Footnote  | [11] A closed production system is defined as a facility with recirculating water that is separated from the wild aquatic medium by effective physical barriers that are in place and well maintained to ensure no escapes of reared specimens or biological material that might survive and subsequently reproduce. |  |  |   |  |   |   |             |
| <b>Criterion 2.4 Transgenic [15] Trout</b>            |  |  |  |   |  |   |   |             |
| <b>Compliance Criteria (Required Client Actions):</b> |  |  | <b>Auditor Evaluation (Required CAB Actions):</b>  |   |  |   |   |             |
| Footnote  | [15] Transgenic trout: A subset of genetically modified organisms, which are organisms that have inserted DNA that originated in a different species. Some GMOs contain no DNA from other species and, therefore, are not transgenic but cisgenic.   |  |  |   |  |   |   |             |
| 2.4.1   | <p><b>Indicator:</b> Allowance for the culture of transgenic trout, including the offspring of genetically engineered trout</p> <p><b>Requirement:</b> None</p> <p><b>Applicability:</b> All</p>   | <b>Instruction to Clients for Indicator 2.4.1 - Culture of Transgenic vs. Genetically Modified Trout</b>   |  |   |  |   |   |             |
|   |  | <p>a. Maintain records for the origin of all cultured stocks including the supplier name, address and contact person(s) for stock purchases.</p>   | A. Review records to confirm compliance with the requirement.  | 1 |  |   | Transgenic trout is not allowed to produce in Italian farms, confirmed by Legislative Decree No. 224 of July 8, 2003 Implementation of Directive 2001/18/EC on the Deliberate Release of Genetically Modified Organisms   |             |
|   |  | <p>b. Ensure purchase documents confirm that the culture stock is not transgenic.</p>  | B. If the auditor suspects that transgenic fish are in culture, add condition that the farm must have stock identity tested by collecting 3 fish for genetic analysis at an ISO 17025 certified laboratory.  |   |  | 1 |   |             |
| Footnote  | [16] Genetic enhancement: The process of genetic improvement via selective breeding that can result in better growth performance and domestication but does not involve the insertion of any foreign genes into the genome of the animal.  |  |  |   |  |   |   |             |
| <b>Criterion 2.5 Escapes from culture facilities</b>  |  |  |  |   |  |   |   |             |
| <b>Compliance Criteria (Required Client Actions):</b> |  |  | <b>Auditor Evaluation (Required CAB Actions):</b>  |   |  |   |   |             |
| 2.5.1   | <p><b>Indicator:</b> Evidence of a well-designed, maintained and managed culture system, infrastructure and farm management to prevent escapes during grow-out and at harvest, as demonstrated through the requirements in Appendix VI</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>           | <p>a. Ensure that farm procedures (see 2.5.2a) address all the farm measures for escape prevention given in Appendix VI. Align farm procedures against requirements in Appendix VI.</p>  | A. Review the list showing how farm's SOPs meet all requirements given in Appendix VI.   | 1 |  |   | Escape procedure, including risk assessment, is described in quality system IOP 7.5.17, rev. January 2014, control of barriers between and at end of farm, controlled and registered daily at MODI 6.3.2.1, seen OK registered  |             |
|   |  | <p>b. Ensure proper maintenance of the culture system and infrastructure to prevent escapes during grow-out and harvest.</p>   | B. During the on-site visit, inspect the culture system to verify proper maintenance of nets, screens and barriers.  | 1 |  |   | The barriers are as described in procedure, well maintained and understood by operators   |             |
|   |  | <p>c. Arrange for the auditor to witness the farm's method of harvesting during the audit.</p>   | C. During the on-site visit, observe how the farm harvests fish to verify effectiveness of escape prevention measures.   | 1 |  |   | Harvesting of fish was observed from waiting cages before slaughter house, fish was slowly gathered together with net and pumped via tube into slaughter house, no possibility for escape of fish   |             |
| 2.5.2   | <p><b>Indicator:</b> Presence of trout farming standard operating procedures (SOP) that incorporate an escape risk assessment [17]</p> <p><b>Requirement:</b> Yes</p>  | <p>a. Prepare a written SOP (see 2.5.1a) that incorporates an escape risk assessment.</p>  | A. Review the farm's SOP to confirm it includes an escape risk assessment. I include a synopsis in auditing report for future standardization of "risk assessment" requirements by ASC or standards setting group.   | 1 |  |   | see 2.5.1a  |             |
|   |  | <p>b. Ensure that the SOP is implemented on the farm.</p>  | B. During the on-site visit, confirm that the SOP is implemented by direct inspection and through interviews with key staff.   | 1 |  |   | see 2.5.1b  |             |
| Footnote  | [17] SOP must clearly define the correct procedures for each aspect of farm operation, identify the risks involved and define mitigation procedures for prevention of escapes.   |  |  |   |  |   |   |             |
| 2.5.3   | <p><b>Indicator:</b> Evidence of farm staff capacities and capabilities, including training of staff prior to starting work and regular training during employment to understand and address risks from escapes and follow the defined SOP</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>       | <p>a. In the SOP for reducing escapes (see 2.5.2a), provide a description of how the farm ensures adequate staff capacity to address risks from escapes.</p>   | A. Review SOP to verify that farm addresses staffing capacity needs in order to reduce escapes.  | 1 |  |   | The staff is trained for the operation follow requirements in Appendix IV, daily reporting of sorting, weighing, feeding, counting of dead fish, including inspection of barriers daily. There is a plan for operators work at farm   |             |
|   |  | <p>b. Maintain documentary records (e.g. minutes, attendance sheets) from regular staff trainings on escape prevention procedures.</p>   | B. Review records to verify that the farm regularly provides its employees with introductory or continuing training on escape prevention procedures.   | 1 |  |   | There are regularly training of staff, seen last training from April, signed by workers, training in welfare, pollution, escape, health, instruments, waste and medicated feed  |             |
|   |  | <p>c. During the on-site visit, conduct interviews with key staff to confirm that training sessions are held regularly and workers are aware of risks.</p>   | C. During the on-site visit, conduct interviews with key staff to confirm that training sessions are held regularly and workers are aware of risks.  | 1 |  |   | Staff are fully aware of the inspection and routines in connection to possible escapes  |             |
| 2.5.4   | <p><b>Indicator:</b> Estimated unexplained loss [18] of farmed trout in net pens is made publicly available</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>  | <b>Instruction to Clients for Indicator 2.5.4 - Calculation of Estimated Unexplained Loss</b>  |  |   |  |   |   |             |
|   |  | <p>a. For each production cycle, maintain detailed records of the following:<br/>- stocking count;<br/>- harvest count;<br/>- mortalities; and<br/>- recorded escapes.</p>   | A. Review records for completeness.  |   |  |   | 1   | No net pens |
|   |  | <p>b. Calculate the estimated unexplained loss as described in the instructions (above) for the most recent full production cycle. For first audit, farm must demonstrate understanding of calculation and the requirement to disclose EUL after harvest of the current cycle.</p> | B. Verify accuracy of farm calculations for estimated unexplained loss.  |   |  |   | 1   | No net pens |
|   |  | <p>c. Make the results from 2.5.4b publicly available (e.g. by publishing information on the farm's website). Keep records of when and where the results were made public for all production cycles.</p>   | C. Verify that the farm makes the information available to the public and describe the means of access in the audit report.  |   |  |   | 1   | No net pens |
| Footnote  | [18] Calculated as: Unexplained loss = Stocking count - harvest count - mortalities - other known escapes.   |  |  |   |  |   |   |             |
| 2.5.5   | <p><b>Indicator:</b> All fish in net pens are counted during each grading</p>  | <p>a. Prepare a written procedure for grading which describes the frequency and methodology for obtaining counts.</p>  | A. Review the farm's procedure for grading.  |   |  |   | 1   | No net pens |

|  |                  |   |  |  |  |  |   |             |
|--|------------------|---|--|--|--|--|---|-------------|
|  | Requirement: Yes | b. Keep records of counts obtained at each grading. | B. Review records and ask producer to trace back a logical unit from harvest to stocking, showing when grading occurred. |  |  |  | 1 | No net pens |
|--|------------------|---|--|--|--|--|---|-------------|

| Criterion 2.6 Predator control [19]                             |  | Compliance Criteria (Required Client Actions):   | Auditor Evaluation (Required CAB Actions):   |   |  |   |   |
|---|--|--|--|---|--|---|---|
| Footnote  | [19] Excluding "vermin" as defined in the local jurisdiction.  |  |  |   |  |   |   |
| 2.6.1   | <b>Indicator:</b> Intentional use of lethal predator control<br><b>Requirement:</b> None [20]<br><b>Applicability:</b> All except as noted in [20]   | <b>Instruction to Clients for Indicator 2.6.1 - Exception to Prohibition on Use of Lethal Predator Control</b>   |  |   |  |   |   |
|   |  | a. Prepare a list of all predator control devices and their locations.   | A. Review list and confirm device locations and working condition during the on-site inspection.   | 1 |  |   | There is a fence around the farm, there is no active predator control at farm   |
|   |  | b. Provide a description of farm procedures for managing predators (e.g. in the SOP identified in 2.5.2) which explains how the farm ensures that all actions are non-lethal.  | B. Verify that the farm's predator control procedures are implemented and that there is no evidence the control measures are lethal.   | 1 |  |   | See 2.6.1a  |
| Footnote  | [20] The ASC Freshwater Trout Standard permits an exception to the prohibition on lethal action in situations where the farm can provide evidence of an assessment that demonstrates lethal action against a particular predator is appropriate, necessary and presents no risks to wild populations or ecosystems. This exception           |  |  |   |  |   |   |
| <b>PRINCIPLE 3: MINIMIZE NEGATIVE EFFECT ON WATER RESOURCES</b> |  |  |  |   |  |   |   |
| Criterion 3.1 Water Use/Abstraction Levels                      |  | Compliance Criteria (Required Client Actions):   | Auditor Evaluation (Required CAB Actions):   |   |  |   |   |
| 3.1.1   | <b>Indicator:</b> Maximum amount of water that a farm can abstract from a natural flowing water body (such as a river or stream)<br><b>Requirement:</b> 50% of the natural water body's flow immediately above the farm [21]<br><b>Applicability:</b> All farms utilizing surface water (such as water from a river) except as noted in [21] | <b>Instruction to Clients for Indicator 3.1.1 - Exemptions from Meeting the Maxima for Water Abstraction</b>   |  |   |  |   |   |
|   |  | a. Inform the CAB if the farm seeks an exemption to 3.1.1. and provide supporting evidence (see Instructions). Otherwise, proceed to 3.1.1b.   | A. If the farm seeks an exemption, review evidence for compliance with regulatory or scientifically-derived water flow minima and provide a synopsis in the audit report. Otherwise, proceed to 3.1.1B.  | 1 |  |   | DMV (Deflusso Minimo Vitale) Minimum Vital Flow; is set by regional law, and estimated and controlled by Studio Gheos IGR, rapport 8.3.2013 |
|   |  | b. Maintain records of all water abstracted by the farm and use these values to calculate the total volume of water abstracted on an annual basis.   | B. Confirm that the farm maintains records of water abstraction and that calculations are accurate for annual volume of water abstracted.  | 1 |  |   | Records of water abstraction is maintained and controlled   |
|   |  | c. Provide the CAB with reliable estimates of water flow immediately above the farm (e.g. scientific studies, government publications). Use these values to calculate the total volume of water flow on an annual basis. | C. Confirm that the farm has access to reliable estimates for water flow immediately above the farm and that calculations are accurate for annual volume of water flow immediately above the farm.   | 1 |  |   | DMV are controlled by Studio Gheos IGR  |
|   |  | d. Use the results of 3.1.1b divided by 3.1.1c multiplied by 100 to determine the percent abstraction of the natural water body's flow.  | D. Review data to verify that the volume of water abstracted does not exceed 50% of the natural water body's flow immediately above the farm during any month of the year. One annual measurement at point of maximum low flow rate period to demonstrate less than 50% water abstraction. The farmer is required to demonstrate historical statistics of what period is defined as "low flow rate". | 1 |  |   | Water abstracted does not exceed 50% of natural water body flow   |
| Footnote  | [21] Farms will be exempted from this requirement if they can demonstrate that they are in a jurisdiction that regulates the farm's water abstraction based on a minimum vital water flow for the natural water body, and the farm's water use respects that minimum vital flow. Farms would also be exempt if they can                      |  |  |   |  |   |   |
| 3.1.2   | <b>Indicator:</b> Demonstration that >90% abstracted water is returned to the natural water body<br><b>Requirement:</b> Yes  | a. Retain records to show how the farm ensures that > 90% of abstracted water is returned to the natural water body.   |  | 1 |  |   | Approximate all water is returned to river water, in addition to water from wells   |
|   |  |  | B. During the on-site visit, inspect the water intake and discharge areas to confirm that the farm has means of estimating returned water volume.  | 1 |  |   | There is measurement of inlet and outlet water, in addition to authority check of equipment   |
| 3.1.3   | <b>Indicator:</b> All use of underground pumped water has been permitted by regulatory authorities<br><b>Requirement:</b> Yes  | <b>Instruction to Clients for Indicator 3.1.3 - Distinction between Surface Water and Underground Pumped Water</b>   |  |   |  |   |   |
|   |  | a. Identify any use of underground pumped water by the farm and include in the farm map or diagram (see 1.1.1e and 2.2.1c).  | A. Verify whether the farm uses underground pumped water or not and record this in the audit report.   | 1 |  |   | Permission for water drilling and use of water from 10 wells from Provincia De Macerata, from 5.8.2011                                      |
|   |  | b. Obtain permits from regulatory authorities.   | B. Confirm that the farm has permits for all pumped water (as applicable).   | 1 |  |   | See 3.1.3.a   |
| 3.1.4   | <b>Indicator:</b> Well depths are tested at least annually, and results made publicly available [22]<br><b>Requirement:</b> Yes<br><b>Applicability:</b> All farms utilizing groundwater (such as water from a   | a. Ensure that well tests are conducted at a similar time each year [22] using an appropriate methodology.   | A. Review evidence to verify that the farm has wells tested at a similar time each year using an appropriate methodology.  | 1 |  |   | Well depths are tested as described in procedure 10P 7.5.19, rev 14.4.2014, last check 16.4.2014, water found at 2,8 m, depth 4 m           |
|   |  | b. Maintain records of results from all tests of well depth.   | B. Confirm that the farm maintains results from tests of well depth.   | 1 |  |   | See 3.1.4.a   |
|   |  | c. Make the results from 3.1.4b available publicly (e.g. by posting on the farm's website). Keep records of when and where results were made public.   | C. Verify that the farm makes the information from 3.1.4b available to the public and record the testing results in the audit report (public section).   |   |  | 1 | The information from the well testing are not available to the public   |
| Footnote  | [22] Well depths must be tested at similar times of the year, with results submitted to ASC. More detailed methodology will be provided in the Auditing Guidance document.   |  |  |   |  |   |   |
| Criterion 3.2 Land-based systems—Water Quality/Effluent         |  | Compliance Criteria (Required Client Actions):   | Auditor Evaluation (Required CAB Actions):   |   |  |   |   |
|   |  | <b>Instruction to Clients for Indicator 3.2.1 - Calculating Total Phosphorus Released per Ton of Fish Produced</b>   |  |   |  |   |   |

|          |  |  |   |   |  |   |
|----------|--|--|---|---|--|---|
| 3.2.1    | <p><b>Indicator:</b> Maximum total amount of phosphorus released into the environment per metric ton (mt) of fish produced over a 12-month period (see methodology in Appendix II-A)</p> <p><b>Requirement:</b> 5 kg/mt of fish produced over a 12-month period; within three years of publication of the ASC Freshwater Trout Standard (7 February 2013), 4 kg/mt of fish produced over a 12-month period</p> <p><b>Applicability:</b> All land-based systems</p> | a. Maintain records showing the amount and type of feeds used during the past 12 months.   | A. Verify that farm has records for feeds used over the relevant time period.   | 1 |  | Type of feeds are recorded and shown, feed produced at Azienda Agricola Erede Rossi Silvio di Rossi Nicola feed mill  |
|          |  | b. For all feeds used (result from 3.2.1a), keep records showing phosphorus content as determined by chemical analysis or based on feed supplier declaration (Appendix II-A).  | B. Verify that farm has records showing the phosphorus content in feeds.  | 1 |  | Records of analyses of phosphorus in feed used for smaller fish (P 1,26-1,41) and growing fish (P 0,85-1,3)   |
|          |  | c. Using equation #1 from Appendix II-A and results from 3.2.1a and b, calculate the total amount of phosphorus added as feed during the last 12 months of production.   | C. Confirm that calculations are done according to Appendix II-A.   | 1 |  | Calculations are done according to Appendix II-A  |
|          |  | d. Maintain records for stocking, harvest and mortality which are sufficient to calculate the amount of biomass produced (equation #2 in Appendix II-A) during the past 12 months.                                     | D. Verify that the farm maintained all records needed to calculate the amount of biomass produced during the past 12 months.  | 1 |  | Biomass produced are calculated as 1056 tons  |
|          |  | e. Calculate the amount of phosphorus in fish biomass produced (result from 3.2.1d) using equation #3 in Appendix II-A.  | E. Confirm that P-content calculations are done according to Appendix II-A.   | 1 |  | Amount of phosphorus in fish biomass using 0,43 % P in fish produced, are calculated according to Appendix II-A   |
|          |  | f. If applicable, maintain records showing the total amount of P removed as sludge (equation #4 in Appendix II-A) during the past 12 months.   | F. As applicable, verify records showing how the farm determined the amount of phosphorus removed from the system as sludge.  | 1 |  | There has been a sludge removal of 70 tons (1,2 % P in DM)  |
|          |  | g. Using the formula in Appendix II-A and results from 3.2.1a-f (above), calculate total phosphorus released per ton of fish produced.   | G. Review calculations to confirm that the farm does not exceed requirements for total amount of phosphorus released.   |   | 1  | Calculations of total P is based on feed conversion rate not in accordance with check calculations at different sizes from farm, calculation of total phosphorus released per tons must be recalculated |
| 3.2.2    | <p><b>Indicator:</b> Minimum oxygen saturation in the outflow, measured monthly (see methodology in Appendix II-B)</p> <p><b>Requirement:</b> 60% [23]</p> <p><b>Applicability:</b> All land-based systems</p>   | <b>Instruction to Clients for Indicator 3.2.2 - Oxygen Saturation in the Outflow</b>   |   |   |  |   |
|          |  | a. Provide monthly monitoring records of DO percent saturation in outflow water for the previous 12 months. For first audits, farm records must cover ≥ 6 months.  | A. Review DO dataset to confirm that monitoring covers the required timeframe and that DO was ≥ 60% for each monthly water sample.  |   | 1  | There is not a regular measurement of DO in outflow water   |
|          |  | b. If any single value from 3.2.2a is < 60%, initiate daily continuous monitoring of DO for > 1 week with an electronic probe and recorder. Maintain a record of the results.  | B. If applicable (see results from 3.2.2a), review the farm's results from daily continuous monitoring to verify that DO saturation in the outflow was ≥ 60% at all times for at least one week.  |   | 1  | There is not a regular measurement of DO in outflow water   |
|          | c. During the on-site visit, make arrangements for the auditor to observe calibration of equipment and measurements.   | C. During the on-site visit, observe how the farm calibrates equipment and takes DO measurements (or takes samples for chemical analysis) to confirm compliance.   | 1   |   | There is DO measurement equipment at farm, calibrated        |   |
| Footnote | [23] If a single oxygen reading is below 60 percent, the farm would need to demonstrate daily continuous monitoring with an electronic probe and recorder for at least a week with a minimum 60 percent saturation at all times.   |  |   |   |  |   |
| 3.2.3    | <p><b>Indicator:</b> Macroinvertebrate surveys downstream from the farm's effluent discharge demonstrate benthic health that is similar to or better than surveys upstream from the discharge (see methodology in Appendix II-C)</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All land-based systems</p>  | <b>Instruction to Clients for Indicator 3.2.3 - Macroinvertebrate Surveys</b>  |   |   |  |   |
|          |  | a. Have a scientific assessment done in the area downstream of the outlet to identify the zone most likely to be impacted by farm discharge. This assessment must consider water mixing and distance from farm outlet. | A. Confirm that the farm used the results from a scientific assessment to determine the location of downstream sampling.  | 1 |  | There has been a scientific measurement of macro invertebrate at inlet and outlet from farm, last analyze 9.4.2014, result inlet 9-10 outlet 10   |
|          |  | b. Prepare a map showing the upstream and downstream transects and sampling stations used for macroinvertebrate surveys (see Appendix II-C).   | B. Review map to verify appropriate siting of sampling stations relative to the scientific assessment (see 3.2.3a) and in compliance with Appendix II-C.  | 1 |  | A map is at farm  |
|          |  | c. Collect benthic samples along transects in accordance with Appendix II-C and maintain records of all sample collections.  | C. Confirm that the sample collection followed Appendix II-C.   | 1 |  | Appendix II-C has been followed   |
|          |  | d. Have an accredited laboratory analyze the samples for benthic invertebrate fauna including characterization of species composition, abundance, diversity, and presence of key sensitive indicator species.          | D. Confirm that the laboratory used by the farm is accredited for analyses of benthic samples. Review the laboratory results to confirm that the samples of benthic fauna were characterized as required.                                     | 1 |  | The laboratory TÜV is accredited for benthic analyze  |
|          |  | e. Using survey results from 3.2.3d, compare the benthic health of areas downstream from the discharge to those areas upstream of the discharge to assure no change.   | E. Review the farm's comparison of upstream and downstream benthic health to confirm that the farm's conclusions are directly supported by objective evidence from benthic surveys. Verify that surveys show compliance with the requirement. | 1 |  | See 3.2.3.a   |
|          | f. Compare how disparity between upstream and downstream benthic health has or hasn't changed through time to determine future surveillance frequency (see instructions).  | F. Compare how disparity between upstream and downstream benthic health has or hasn't changed through time to determine future surveillance frequency (see instructions).  | 1   |   | Analysis as requirement                                      |   |
| 3.2.4    | <p><b>Indicator:</b> Evidence of implementation of biosolids (sludge) Best Management Practices (BMPs) (see Appendix II-D)</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All land-based systems</p>  | <b>Note:</b> Detailed description of the biosolids (sludge) Best Management Practices is given in Appendix II-D of the ASC Freshwater Trout Standard.  |   |   |  |   |
|          |  | a. Prepare a biosolids (sludge) management plan that addresses all requirements in Appendix II-D.  | A. Review the farm's biosolids (sludge) management plan for compliance with Appendix II-D.  | 1 |  | There is a plan with flow diagram, for use of sludge, described in quality system, delivered at fields after a four years plan  |
|          |  | b. Prepare a process flow diagram of the key steps taken to responsibly manage sludge identifying treatment, transfer, storage, utilization and disposal.  | B. Evaluate the flow diagram to confirm it covers all steps (e.g. cleaning routines of pipes, sumps, channels and units).   | 1 |  | Steps are followed in sludge plan   |
|          |  | c. Maintain records of biosolid (sludge) cleaning, maintenance, and disposal as described in Appendix II-D.  | C. Review the farm's records to verify there is evidence of implementation of biosolids management as required in Appendix II-D.  | 1 |  | Biosolid management is implemented  |
|          | d. During the on-site visit, inspect the farm and conduct community interviews to verify there is no evidence for discharge of biosolids into natural water bodies.  | D. During the on-site visit, inspect the farm and conduct community interviews to verify there is no evidence for discharge of biosolids into natural water bodies.  | 1   |   | There is no discharge of biosolids into natural water bodies |   |

|   |  | Instruction to Clients for Indicator 3.2.5 - Water Quality Monitoring Matrix, Land-Based Systems   |  |   |  |  |  |   |  |
|---|--|--|--|---|--|--|--|---|--|
| 3.2.5   | <b>Indicator:</b> Water-quality monitoring matrix completed and submitted to ASC (see Appendix II-B)<br><br><b>Requirement:</b> Yes<br><br><b>Applicability:</b> All land-based systems  | a. Conduct ≥ 6 months of water quality monitoring before first audit. Thereafter, monitoring should be part of production practices for certified farms.   | A. Do not schedule the on-site audit until client has monitoring dataset.  | 1   |  |  |  | Water monitoring dataset for more than 6 month is established |  |
|   |  | b. Complete the Water Quality Monitoring Matrix (Appendix II-B) and submit to CAB.   | B. Review Matrix to verify that client monitored all four required parameters at the required frequency.   | 1   |  |  |  | The matrix fulfilled for TP, TN, BOD and TSS                  |  |
|   |  | c. Calibrate all equipment at the frequency and by the method recommended by the manufacturer. Calibrate daily if there is no manufacturer's recommendation.   | C. Verify that client calibrates equipment as required.  |   |  |  |  | 1   | NA, analyzes by accredited laboratory, Qualchem S.n.c and TÜVSÜD |
|   |  | d. During the audit of the farm, arrange to conduct water quality monitoring. The auditor will witness water sampling.   | D. Witness the client conducting water quality monitoring.   |   |  |  |  | 1   | NA, analyzes by accredited laboratory, Qualchem S.n.c and TÜVSÜD |
|   |  | e. Collect water samples and prepare them for shipment to a laboratory (if applicable).  | E. Witness the farm collecting water samples or (if applicable) preparing samples to send to an independent laboratory.  |   |  |  |  | 1   | NA, analyzes by accredited laboratory, Qualchem S.n.c and TÜVSÜD |
|   |  | f. Perform routine analysis of water samples (i.e. done in the same manner as for previous months of water quality monitoring).  | F. Witness the farm's analyses of water samples or (if applicable) review evidence that the independent laboratory is suitably qualified to perform analyses.                        |   |  |  |  | 1   | NA, analyzes by accredited laboratory, Qualchem S.n.c and TÜVSÜD |
|   |  | g. Record values for each parameter and submit results to CAB.   | G. Review the recorded values and examine consistency with the farm's previous results for water quality monitoring.   | 1   |  |  |  |   | Parameters are consistent  |
|   |  | h. Submit data on water quality monitoring to ASC as per Appendix II-B.  | H. Confirm that client has submitted data on water quality to ASC (Appendix II-B).   | 1   |  |  |  |   | Data are submitted to ASC  |
| <b>Criterion 3.3 Cage-Based Systems—Water Quality/Benthic Community</b> |  |  |  |   |  |  |  |   |  |
|   |  | <b>Compliance Criteria (Required Client Actions):</b>  |  | <b>Auditor Evaluation (Required CAB Actions):</b> |  |  |  |   |  |
| 3.3.1   | <b>Indicator:</b> For cages located on water bodies with a surface area less than 1,000 km <sup>2</sup> , evidence that farm production levels reflect the results of an assimilative capacity study (see Appendix II-E)<br><br><b>Requirement:</b> Yes<br><br><b>Applicability:</b> Cage-based systems operating on water bodies with a surface area < 1000 km <sup>2</sup> | <b>Instruction to Clients for Indicator 3.3.1 and 3.3.2 - Classification of Surface Area of Water Body</b>   |  |   |  |  |  |   |  |
|   |  | a. Determine the surface area of the water body where the farm operates.   | A. Review data to confirm that it comes from an accurate and reliable source.  |   |  |  |  |   | 1  |
|   |  | b. Inform the CAB if results from 3.3.1a indicate that the water body is less than 1,000 km <sup>2</sup> surface area and proceed to 3.3.1c. Otherwise, go to 3.3.2.                                   | B. Verify that the farm has correctly assigned the water body to a size class. If the water body is ≥ 1,000 km <sup>2</sup> then Indicator 3.3.1 does not apply.                     |   |  |  |  |   | 1  |
|   |  | c. Obtain a documented assimilative capacity study for the water body where the farm operates. The assimilative capacity study must address all requirements described in Appendix II-E.               | C. Review the assimilative capacity study to verify it meets the requirements of Appendix II-E (e.g. appropriateness of model used, scope of investigation, and analyses performed). |   |  |  |  |   | 1  |
|   |  | d. Provide evidence that the farm production levels reflect the results of the assimilative capacity study in 3.3.1c.  | D. Review the conclusions presented in 3.3.1c to verify that loading from farm production levels does not exceed water body capacity to assimilate.                                  |   |  |  |  | 1   |  |
| 3.3.2   | <b>Indicator:</b> For cages located on water bodies with a surface area of 1,000 km <sup>2</sup> or greater, evidence that cages are located at sites that are classified as "Type 3" sites, as defined in Appendix II-F<br><br><b>Requirement:</b> Yes<br><br><b>Applicability:</b> Cage-based systems operating on water bodies with a surface area ≥ 1000 km <sup>2</sup> | <b>Instruction to Clients for Indicator 3.3.2 - Water Body Classifications as Type 1, Type 2 or Type 3</b>   |  |   |  |  |  |   |  |
|   |  | a. Determine the surface area of the water body where the farm operates (see 3.3.1a). If the surface area is 1,000 km <sup>2</sup> or greater, proceed to 3.3.2b. Otherwise, go to 3.3.1               | A. Verify that the farm has correctly assigned the water body to a size class. If the water body is < 1,000 km <sup>2</sup> then Indicator 3.3.2 does not apply.                     |   |  |  |  |   | 1  |
|   |  | b. Provide evidence that the water body classification was performed by a regulatory agency as required under Appendix II-F. If no regulatory agency has classified the water body, proceed to 3.3.2c. | B. Review the evidence from the regulatory agency to confirm that the site is classified as "Type 3" according to the required methodology (if applicable).                          |   |  |  |  |   | 1  |
|   |  | c. If applicable, hire a qualified independent consultant to analyze and classify the site where the farm operates in accordance with the definitions in Appendix II-F.                                | C. As applicable, verify that the consultant was suitably qualified and provided a detailed analysis to support the determination.   |   |  |  |  |   | 1  |
|   |  | -  | D. Confirm that actual cage locations are at sites classified as Type 3.   |   |  |  |  | 1   |  |

|  |  |  |  |  |  |  |  |  |   |
|--|--|--|--|--|--|--|--|--|---|
| 3.3.3  | <b>Indicator:</b> Water quality monitoring matrix completed (see Appendix II-G)<br><b>Requirement:</b> Yes<br><b>Applicability:</b> All cage-based systems   | <b>Instruction to Clients for Indicator 3.3.3 - Water Quality Monitoring, Cage-Based Systems</b>   |  |  |  |  |  |  |   |
|  |  | a. Conduct ≥ 6 months of water quality monitoring before first audit and submit to CAB.  | A. Do not schedule the on-site audit until client has monitoring dataset.  |  |  |  |  |  | 1 |
|  |  | 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.  |  |  |  |  |  | 1 |
|  |  | c. During the audit of the farm, arrange to conduct water quality monitoring at location of auditor's choice.  | C. Witness the client conducting water quality monitoring.   |  |  |  |  |  | 1 |
|  |  | e. Collect water samples at the same location as 3.3.3a and obtain analysis from a water quality laboratory at least once annually.  | E. Examine independent analyses performed by an independent laboratory (i.e. not by farm staff) for consistency with farm results for months where duplicate samples taken.  |  |  |  |  |  | 1 |
|  |  | f. Assure that values from laboratory are consistent with values obtained from laboratory results. If values differ by >5%, demonstrate how equipment has been recalibrated, replaced, or how procedures have been modified. | F. Examine percent error between farm measurements and auditor measurements. Determine whether amendments made are sufficient. Auditor is at liberty to request a second set of tests to confirm accurate recalibration. |  |  |  |  |  | 1 |
|  |  | g. Submit data on water quality monitoring to ASC as per Appendix II-B.  | G. Confirm that client has submitted data on water quality to ASC (Appendix II-B).   |  |  |  |  |  | 1 |
|  |  | 3.3.4  | <b>Indicator:</b> Maximum baseline total phosphorus concentration of the water body (see Appendix II-H)<br><b>Requirement:</b> ≤ 20 µg/l [24]<br><b>Applicability:</b> All cage-based systems                            | <b>Instruction to Clients for Indicator 3.3.4 - Establishing a Baseline Total Phosphorus Concentration</b> |  |  |  |  |   |
| a. Provide CAB with a description of the farm's TP monitoring program (e.g. sampling station, sampling protocol, name of laboratory used).                     | A. Review farm's description of the TP monitoring program to verify it complies with requirements. Where situations arise with complex modified water bodies (eg: large lakes and/or hydroelectric facilities); resulting in high or variable water depth fluctuations; sites should record with frequent monitoring flow, depth and water quality |  |  |  |  |  |  |  | 1 |
| b. Implement monitoring of TP as described in the instructions for Indicator 3.3.3.  | B. During on site visit, observe sample collection, processing, and transport or mailing to the laboratory.  |  |  |  |  |  |  |  | 1 |
| c. Identify the baseline TP concentration of the water body (see Instructions above) and provide the CAB with evidence to show how this value was established. | C. Review the farm's evidence for establishment of a baseline TP concentration and record the value and rationale in the audit report.   |  |  |  |  |  |  |  | 1 |
| d. Provide monthly TP monitoring data to the CAB.  | D. Review TP data set for completeness and cross-check against previous monitoring results for consistency.  |  |  |  |  |  |  |  | 1 |
| -  | E. Review TP monitoring records and verify that no quarterly TP concentration is ≤ 20 µg/l.  |  |  |  |  |  |  |  | 1 |
| Footnote   | [24] This concentration is equivalent to the upper limit of the Mesotrophic Trophic Status classification as described in Appendix II-H.   |  |  |  |  |  |  |  |   |
| 3.3.5  | <b>Indicator:</b> Minimum percent oxygen saturation of water 50 centimeters above bottom sediment (at all oxygen monitoring locations described in Appendix II-G)<br><b>Requirement:</b> ≥ 50%<br><b>Applicability:</b> All cage-based systems   | a. Provide CAB with a description of the farm's oxygen saturation monitoring program (see Indicator 3.3.3).  | A. Review farm's description of the oxygen saturation monitoring program to verify it complies with requirements.  |  |  |  |  |  | 1 |
|  |  | b. Implement monitoring of oxygen saturation according to the methods described above.   | B. During on site visit, observe sample collection, processing, and transport or mailing to the laboratory.  |  |  |  |  |  | 1 |
|  |  | c. Provide oxygen monitoring data to the CAB.  | C. Review oxygen saturation data set for completeness and cross-check against independent laboratory results. Raise a non-conformity for disparities ≥ 5%.   |  |  |  |  |  | 1 |
|  |  | d. Collect oxygen saturation sample in the presence of an auditor and auditor witnesses transfer to an accredited lab or lab employee.   | D. Review oxygen saturation monitoring records and verify that no quarterly value is <50%.   |  |  |  |  |  | 1 |
| 3.3.6  | <b>Indicator:</b> Trophic status classification of water body remains unchanged from baseline (see Appendix II-H)<br><b>Requirement:</b> Yes<br><b>Applicability:</b> All cage-based systems   | a. Obtain documentary evidence stating the trophic status of water body if previously set by a competent authority (if applicable). If not, got to 3.3.6.b   | A. Verify that farm obtains evidence that the trophic status of the water body has been previously set by a competent authority (as applicable).   |  |  |  |  |  | 1 |
|  |  | b. If the trophic status of the water body has not previously been classified, use the baseline TP concentration (result from 3.3.4c) to assign a trophic status to the water body according to the table in Appendix II-H.  | B. Verify that the farm has correctly assigned trophic status to the water body using baseline TP concentration.   |  |  |  |  |  | 1 |
|  |  | c. Compare the current trophic status of the water body (results from either 3.3.6a or 3.3.6b) to the trophic status reported in all previous audits. For first audits, this requirement is not applicable.                  | C. Review the farm's conclusion to verify compliance with the requirement.   |  |  |  |  |  | 1 |
| <b>Indicator:</b> Maximum allowed increase in total phosphorus   |  | <b>Instruction to Clients for Indicator 3.3.7 - Calculation of Percent Increase in TP from Baseline</b>  |  |  |  |  |  |  |   |



|   |   |   |   |  |  |  |   |  |
|---|---|---|---|--|--|--|---|--|
| 3.3.7   | concentration in lake from baseline   | a. Use the result from Indicator 3.3.4 (above) to identify the baseline TP concentration that will be used to calculate percent change from baseline.   | A. Verify that the farm has justification for selecting the TP value to serve as the baseline TP concentration for the water body (as was done for 3.3.4).  |  |  |  | 1 |  |
|   | <b>Requirement:</b> 25% for water bodies with a surface area of less than 1,000 km <sup>2</sup>   | b. Use the result from Indicator 3.3.1 and 3.3.2 (above) to identify the size of the water body in which the farm operates.   | B. Verify that farm has accurately categorized the size of the water body.  |  |  |  | 1 |  |
|   | 15% for water bodies with a surface area of 1,000 km <sup>2</sup> or greater  | c. Use TP monitoring data from the reference station taken over the past 12 months to calculate the current annual average concentration of TP.   | C. Verify that farm has accurately calculated the current annual average TP concentration using data from the reference station.  |  |  |  | 1 |  |
|   | <b>Applicability:</b> All cage-based systems as specified according to size of water body in which the farm operates  | d. Calculate the difference between 'baseline TP' and the annual average TP concentration over the most recent 12 months according to the instructions given above.   | D. Verify that the farm has made accurate calculation of the percentage difference in TP concentration.   |  |  |  | 1 |  |
|   |   |   | E. Confirm that any observed increase in phosphorus concentration falls within the maximum allowed range for the size of water body where the farm operates.  |  |  |  | 1 |  |
| 3.3.8   | <b>Indicator:</b> Maximum total amount of phosphorus released into the environment per metric ton (mt) of fish produced over a 12-month period (see Appendix II-A)<br><br><b>Requirement:</b> 5 kg/mt of fish produced over a 12-month period; within three years of publication of the ASC Freshwater Trout Standard (7 February 2013), 4 kg/mt of fish produced over a 12-month period.<br><br><b>Applicability:</b> All cage-based systems | <b>Instruction to Clients for Indicator 3.3.8 - Calculation of Total Phosphorus Released per Ton of Fish Produced</b>   |   |  |  |  |   |  |
|   |   | a. Maintain records showing the amount and type of feeds used during the past 12 months.  | A. Verify that farm has records for feeds used over the relevant time period.   |  |  |  | 1 |  |
|   |   | b. For all feeds used (result from 3.3.8a), keep records showing phosphorus content as determined by chemical analysis or based on feed supplier declaration (Appendix II-A).   | B. Verify that farm has records showing the phosphorus content in feeds.  |  |  |  | 1 |  |
|   |   | c. Using equation #1 from Appendix II-A and results from 3.3.8a and b, calculate the total amount of phosphorus added as feed during the last 12 months of production.  | C. Confirm that calculations are done according to Appendix II-A.   |  |  |  | 1 |  |
|   |   | d. Maintain records for stocking, harvest and mortality which are sufficient to calculate the amount of biomass produced (equation #2 in Appendix II-A) during the past 12 months. Value taken from 3.2.1.d   | D. Verify that the farm maintained all records needed to calculate the amount of biomass produced during the past 12 months.  |  |  |  | 1 |  |
|   |   | e. Calculate the amount of phosphorus in fish biomass produced (result from 3.3.8d) using equation #3 in Appendix II-A.   | E. Confirm that P-content/biomass produced calculations are done according to Appendix II-A.  |  |  |  | 1 |  |
|   |   | f. If applicable, maintain records showing the total amount of P removed as sludge (equation #4 in Appendix II-A) during the past 12 months. This compliance criteria valid for flow-through systems but does not apply for cage systems.   | F. As applicable, verify records showing how the farm determined the amount of phosphorus removed from the system as sludge. This compliance criteria valid for flow-through systems but does not apply for cage systems.                             |  |  |  | 1 |  |
|   |   | g. Using the formula in Appendix II-A and results from 3.3.8a-f (above), calculate total phosphorus released per ton of fish produced.  | G. Review calculations to confirm that the farm does not exceed requirements for total amount of phosphorus released.   |  |  |  | 1 |  |
| <b>Criterion 4.1 Farm health management</b>           |   |   |   |  |  |  |   |  |
| <b>Compliance Criteria (Required Client Actions):</b> |   |   | <b>Auditor Evaluation (Required CAB Actions):</b>   |  |  |  |   |  |
| 4.1.1   | <b>Indicator:</b> Presence of a site-specific farm health plan that is reviewed at least annually and addresses biosecurity, veterinary health, crisis management and risk assessment   | a. Prepare a Farm Health Plan (FHP) that is site-specific and addresses biosecurity, veterinary health, crisis management, and risk assessment  | A. Review the farm health plan to confirm that it adequately addresses each of the relevant requirements.   |  |  |  | 1 | Health plan, sanitary veterinary program, rev. 04 including biosecurity, veterinary health, crisis management and risk assessment  |
|   | <b>Requirement:</b> Yes   | b. Ensure that the FHP is reviewed and updated at least annually with signatures by farm management indicating approval.  | B. Verify that farm management approves review and update of the FHP at least annually.   |  |  |  | 1 | Health plan is reviewed and signed by Rossi and veterinarian, Fr. Mazzanti, per year   |
|   | <b>Applicability:</b> All   | c. Ensure that the farm's designated veterinarian reviews and approves the FHP annually and after each update of the FHP, by signature.   | C. Confirm that the farm has paperwork showing signature and date of review by designated veterinarian.   |  |  |  | 1 | see 4.1.1.b  |
| 4.1.2   | <b>Indicator:</b> All fish, at all stages in the life cycle, are sourced from a supply that is of equal or better health status than its own stock<br><br><b>Requirement:</b> Yes<br><br><b>Applicability:</b> All  | a. Design a set of health status metrics that can be evaluated at all relevant phases of the life history. Have the metrics reviewed and approved by the farm's designated health care professional.  | A. Verify that the farm has designed health status metrics which are reasonable and can be evaluated across the life history. Confirm that the metrics were approved by the farm's designated health care professional.                               |  |  |  | 1 | Deliveries are followed by health status, described as good, medium, not good, approved by veterinarian  |
|   |   | b. Ensure that the farm's designated health care professional samples fish on-site during an annual inspection and maintains records of conditions using metrics defined by 4.1.2a.   | B. Examine the farm's record of conditions from annual inspection by the farm's designated health care professional.  |  |  |  | 1 | Fish are not moved from lower to higher status of health, health status checked from deliveries.   |
|   |   | c. Ensure that the samples of health condition (from 4.1.2b) are taken from all of the main cohorts in production during each health status inspection.   | C. Ensure records of evaluations are taken from all main cohorts in production at the time of the veterinary health care professional's inspection.   |  |  |  | 1 | Samples have been taken from all main cohorts in production  |
|   |   | d. Prior to accepting a transfer of fish, ensure that the supplier has evaluated fish using the farm's health status metrics in 4.1.2a. Farm's may also use evidence from statutory evaluations (e.g. health certificates) as a basis for accepting transfers provided that the evaluations are appropriately documented. | D. Verify that the farm has evidence of suppliers evaluating fish using the farm's health status metrics prior to accepting transfer. Or, if applicable, verify that the farm reviews evidence from statutory evaluations before accepting transfers. |  |  |  | 1 | Supplier of fish is from own hatchery, Freddara, where the same quality system applies   |
|   |   | e. Ensure that responsible farm staff are trained in evaluating condition using health status metrics.  | E. Verify that responsible staff understand how to evaluate condition using health status metrics.  |  |  |  | 1 | Responsible staff are fully trained and aware of health system   |
|   |   | f. The farm shows evidence that inspections by the veterinary health professional include co-scoring of fish condition with farm staff, with comparison for consistency after scoring.  | F. Verify that the farm has some form of evidence showing that co-scoring has been calibrated between the veterinary health professional and farm staff.  |  |  |  | 1 | The veterinarian visit farm regularly, veterinarian and staff are calibrated at every visit, as farm staff have evaluated eventually sickness at request of veterinarian |
|   |   | g. Ensure that farm staff evaluate a subsample of individuals in all shipments. Those not conforming are returned to the supplier with health status metrics recorded.  | G. Verify that the farm has evidence of staff evaluating a subsample of individuals for all shipment and that shipments are or are not released as appropriate.   |  |  |  | 1 | Subsample of fish are evaluated for shipments  |
| 4.1.3   | <b>Indicator:</b> All fish that are moved off site, at all stages in the life cycle, are moved to a location of equal or lesser health status<br><br><b>Requirement:</b> Yes<br><br><b>Applicability:</b> All   | a. Ensure that receivers evaluate fish health condition using metrics defined by the farm's designated veterinary health specialist (4.1.2a) at the receiving location prior to transfer, and to convey this information prior to transfer.   | A. Verify the farm has evidence that receivers have conveyed condition scores to the farm prior to accepting transfer.  |  |  |  | 1 | Condition scores are known by staff and verified by veterinarian and register  |
|   |   | b. Ensure that trained farm staff (4.1.2e) evaluate the health condition of a subsample of individuals prior to moving fish off site.   | B. Verify that appropriately trained staff (as per 4.1.2e) have evaluated health condition and have recorded results prior to out-shipments.  |  |  |  | 1 | Health condition are registered and evaluated by staff   |
|   |   | c. Ensure that fish are only moved off site if there are records demonstrating that fish health in the receiving location is equal to or less than that in the shipping location.   | C. Verify that the farm has a protocol that assures that evaluations show health status in receiving location is equal to or less than that in the shipping location.   |  |  |  | 1 | Health status documented in health protocol  |

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| 4.1.4   | <b>Indicator:</b> Site access, disinfection and hygiene protocols are written and observed<br><b>Requirement:</b> Yes<br><b>Applicability:</b> All   | a. Prepare written protocols for site access, disinfection and hygiene (these protocols may be incorporated into the Farm Health Plan in 4.1.1a).  | A. Verify that the required protocols exist.  | 1 |   | Protocols for site access, disinfection and hygiene protocols  |
|   |  | b. In the above protocols (4.1.4a) make direct reference to national regulations related to site access, disinfection and hygiene.   | B. Verify that relevant national legislation has been appropriately accounted for in protocols.   | 1 |   | Relevant legislation is accounted for  |
|   |  | c. Ensure that farm protocols for site access, disinfection and hygiene are implemented.   | C. Verify that the farm has on-site access to all materials needed for implementation of disinfection and hygiene protocols.  | 1 |   | Materials needed from hygiene protocols at place   |
|   |  | -  | D. Confirm that relevant staff are aware of nature and intent of protocols through interview.   | 1 |   | Staff are fully aware of hygiene protocols   |
| 4.1.5   | <b>Indicator:</b> Biosecure disposal of mortalities and fish trimmings<br><b>Requirement:</b> Yes<br><b>Applicability:</b> All   | a. Maintain records for all disposal of fish tissue including mortalities and fish trimmings.  | A. Verify that the farm maintains records of all disposal of fish tissue.   | 1 |   | Dead fish are collected in tanks for category 2 materials, and collected regularly by Lorenzini s.r.l., seen documentation for category 2 material from 7.5.2014 and 14.5.2014 |
|   |  | b. Create a protocol for biosecure disposal of biological tissue and fish trimmings with a rationale explaining how biosecurity is achieved.   | B. Verify that the farm's protocol provides an adequate rationale to ensure biosecure disposal of mortalities and fish trimmings.   | 1 |   | Farm protocol for management of waste, OP 7.5.7.A includes handling of mortalities and fish trimmings  |
|   |  | c. In the above protocol (4.1.5b), make explicit reference to any national regulations related to disposal of biological waste.  | C. Verify that relevant national legislation has been appropriately accounted for in the protocol.  | 1 |   | Relevant legislation is accounted for  |
|   |  | -  | D. Confirm that relevant staff are aware of nature and intent of protocols through interviews.  | 1 |   | Staff are aware of management of waste   |
| 4.1.6   | <b>Indicator:</b> Immediate investigation of all mortality events on site and, in instances where mortality remains unexplained or unattributed, further investigation with fish health professionals off site<br><b>Requirement:</b> Yes<br><b>Applicability:</b> All   | Note: On-site investigation of mortality events (4.1.6c) is not required when farms have all mortality events investigated immediately off-site (4.1.6d).  |   |   |   |  |
|   |  | a. Maintain records of all mortalities and identify cause where known, or actions taken if unknown.  | A. Verify that the farm maintains relevant records of mortality events including timing of response and investigation of cause.   | 1 |   | Records of dead fish daily, regular contact with veterinarian of dead fish   |
|   |  | b. Ensure that the mortality records in 4.1.6a include objective evidence (e.g. time-stamped photographs or similar) showing the farm investigated each unexplained mortality event within 24 hours of detection.  | B. Review a sample of records and supporting evidence to confirm that the farm investigated each unexplained mortality event within 24 hours of detection.  | 1 |   | For mortality of fish, veterinarian is contacted, no unexplained mortality registered  |
|   |  | c. For investigation of mortality events that are conducted on site, maintain a record of the tests used and the results obtained.   | C. Verify evidence of records and methods used on site to investigate mortality events.   | 1 |   | Last bigger mortality registered 13.12.2013, veterinarian contacted, red mouth disease was diagnosed, and treated 3700 kg medicated feed for 8 days                            |
| 4.1.7   | <b>Indicator:</b> Minimum frequency of inspection of the farm by a designated veterinarian [26] who specializes in aquatic animal health. The inspection must review the farm health plan.<br><b>Requirement:</b> ≥ 1 inspection per year, at a time when the site is in production<br><b>Applicability:</b> All | a. Maintain log showing the date of visit, title and affiliation of designated veterinarian.   | A. Verify that an inspection log is maintained.   | 1 |   | Visit from Veterinarian from Marche Servizio Veterinario, two times per month, seen sign and stamp in veterinarian protocol  |
|   |  | b. Obtain signature from designated veterinarian confirming inspection and date.   | B. Verify that inspections frequency is compliant with requirements.  | 1 |   | See 4.1.7.a  |
|   |  | c. Maintain on site, a current (within 3 years) CV of the farm's designated veterinarian.  | C. Verify that the credentials of the designated veterinarian conform to the definition in Footnote 26.   | 1 |   | Veterinarian Fr. Mazeranti, curriculum vitae, certificate veterinarian 2004  |
|   |  | -  | D. Use feed records to ensure that inspections occurred during production.  | 1 |   | Production during visit verified   |
| Footnote [26] A designated veterinarian is the professional responsible for health management on the farm who has the legal authority to diagnose disease and prescribe medication. He/she is expected to have a degree in veterinary medicine and a strong background in fish disease control. |  |  |   |   |   |  |
| 4.1.8   | <b>Indicator:</b> Evidence that maximum stock density was determined jointly by the designated veterinarian and site management<br><b>Requirement:</b> Yes<br><b>Applicability:</b> All  | a. Include rationale for maximum stock density in the farm health plan (see 4.1.1) that refers to peer reviewed reference material.  | A. Verify that a section is included in the farm health plan that rationalizes stocking density and contains relevant references. Cross-check a sample of the peer-reviewed citations to confirm legitimacy and quality.  | 1 |   | Maximum density is included in health plan and signed by veterinarian, density is followed daily at every tank   |
|   |  | b. Obtain signatures from the designated veterinarian during annual inspection confirming agreed maximum stocking density.   | B. Verify that the designated veterinarian approved the maximum stocking density at each annual inspection.   | 1 |   | See 4.1.8.a  |
|   |  | c. Prepare a letter signed by the farm senior manager stating that maximum stock density was determined jointly by the designated veterinarian and site management.  | C. Verify that the farm has a signed letter from the senior manager stating that maximum stock density was determined by the designated veterinarian and site management.   | 1 |   | Density is agreed by management and veterinarian in protocol   |
|   |  | -  | D. Verify through interviews with site manager that he/she was consulted in the decision to determine maximum stock density.  | 1 |   | Maximum stock density are planned in coordination with farm management and veterinarian  |
| <b>Criterion 4.2 Chemicals and treatments</b>   |  |  |   |   |   |  |
|   |  | <b>Compliance Criteria (Required Client Actions):</b>  |   |   | <b>Auditor Evaluation (Required CAB Actions):</b> |  |
| 4.2.1   | <b>Indicator:</b> Presence of a treatment plan, treatment record book and farm health history that includes detailed recording of all treatments and all health events on the farm, as well as written veterinary prescriptions and receipts<br><b>Requirement:</b> Yes  | a. Create requisite protocols which include at a minimum: name of the veterinary health professional prescribing treatment; product name and chemical name (for all therapeutants and antimicrobials); treatment plan and reason for use (specific disease); date(s) of treatment; amount (g) of product used; dosage; quantity of fish treated (mt); WHO classification of any antibiotics; and supplier of chemicals or therapeutants. | A. Verify that farm has a treatment plan and records of all treatments, health events and veterinary prescriptions.   | 1 |   | There is a treatment plan, visit rapport from veterinarian and records of all treatments in health protocol, this include antibiotic and chemical treatments                   |
|   |  | b. Keep required records and receipts outlined in 4.2.1a and assemble them for the last full production cycle.   | B. Verify that the farm has receipts that match treatments over a subsample of time and cross-check prescriptions and treatment records against the FHP.  | 1 |   | Receipt and treatment verified for treatment from 19. - 26.12.2013   |
| 4.2.2   | <b>Indicator:</b> Use of therapeutic treatments, including antibiotics or other treatments, that are banned under European Union (EU) law<br><b>Requirement:</b> Not permitted<br><b>Applicability:</b> All  | a. Maintain a list of therapeutants (including antibiotics) banned by the EU and update the list no less than annually.  | A. Cross-check receipts for treatments/therapeutants and confirm that none are items banned under EU law. If ASC has agreed to maintain a list of relevant therapeutants, farms can demonstrate that they have this list. | 1 |   | No therapeutic treatment banned under EU law   |
|   |  | b. Ensure that staff responsible for purchasing and administering therapeutants (including antibiotics) are aware of banned therapeutants listed in 4.2.2a.  | B. Verify through interviews with staff that they are aware that the use of therapeutants banned under EU law is not permitted.   | 1 |   | There is a clear understanding of banned therapeutic, only approved therapeutics are used  |
|   |  | c. Maintain records of voluntary and/or mandatory chemical residue testing conducted or commissioned by the farm from the prior and current production cycles.   | C. As applicable, review results from any voluntary or mandatory chemical residue testing to verify that no EU banned substances were detected.   | 1 |   | Residue testing verify no use of EU banned chemicals   |
|   |  | d. Prior to each surveillance audit, provide the auditor with a list of all production lots. The auditor may use the list to select random samples for chemical residue testing.   | D. If there is a credible reason to suspect that fish have been treated with chemicals banned in the EU, collect tissue samples from at least 3 fish for chemical analysis at an ISO 17025 certified laboratory.          | 1 |   | This is an initial audit, there is no reason for suspect that fish has been treated with chemicals banned by EU  |

|   |   | Instructions to Clients for Indicator 4.2.3 - Use of Prebiotic and Probiotic Treatments  |   |   |  |  |  |
|---|---|--|---|---|--|--|--|
| 4.2.3   | <b>Indicator:</b> Prophylactic use of chemical antimicrobial treatments (excluding prebiotics and probiotics that have been approved by a regulatory process that included a risk assessment) [27]<br><br><b>Requirement:</b> Not permitted<br><br><b>Applicability:</b> All                          | a. Inform the CAB if the farm used any prebiotic or probiotic treatments for the last full production cycle and, if applicable, provide chemical names.  | A. Determine if the farm's use of prebiotics or probiotics qualifies for an exclusion (see Instructions), verify that the chemical compounds are not banned in the EU, and provide a rationale in the audit report.       | 1   |  |  | There is no prophylactic use of chemical antimicrobial treatments, amount of medicated feed not used for a treatment is approved and signed by veterinarian  |
|   |   | b. Maintain records of all chemical antimicrobial treatments for the last full production cycle as per 4.2.1a and 4.2.1b.  | B. Verify records of treatments and cross-check against purchases and inventories of chemical antimicrobial compounds.  | 1   |  |  | Records of treatments in health protocol, verified   |
|   |   | c. Provide records to show that all chemical antimicrobial treatments identified in 4.2.3b were prescribed by the farm's veterinary health care professional before application.   | C. Review records of antimicrobial treatments and cross-check against prescriptions to verify there is no evidence for prophylactic treatments.   | 1   |  |  | The antimicrobial components used, are prescribed by veterinarian  |
| Footnote  |   | [27] The washing of eggs is permitted under this requirement.  |   |   |  |  |  |
| 4.2.4   | <b>Indicator:</b> Public disclosure of all antimicrobial treatments used on the farm<br><br><b>Requirement:</b> Yes   | a. Maintain records of all antimicrobial treatments for the last full production cycle as per 4.2.1b.  | A. Review farm records (4.2.1b) to identify all antimicrobial treatments used for the last full production cycle.   | 1   |  |  | Records of treatments in health protocol, verified   |
|   |   | b. Make public disclosure of all antimicrobial treatments (4.2.4a) over the last full production cycle (e.g. by publishing information on the farm's website). <b>Optional:</b> farms may choose to disclose information about antimicrobial treatments by completing Appendix VI from the ASC Salmon Standard and then submitting the form to ASC for publication on the ASC website. | B. Verify that the farm has disclosed information about antimicrobial treatments and that the information is readily accessible by the public.  |   |  |  | 1  |
| 4.2.5   | <b>Indicator:</b> Proactive vaccination against diseases that present a risk in the region and for which an effective, legally authorized and commercially viable vaccine exists, as determined by the farm's designated veterinarian<br><br><b>Requirement:</b> Yes<br><br><b>Applicability:</b> All | a. Request that the veterinary health professional creates a record listing diseases that present a risk in the region and the relevant, available vaccine (or absence of a suitable vaccine).   | A. Verify that the farm holds a list of the regional diseases that also gives the relevant, available vaccine or states the absence of a suitable vaccine.  | 1   |  |  | There is a list of relevant regional diseases, also illustrated with pictures in health protocol. No vaccines are used   |
|   |   | b. Maintain a record of all vaccinations administered.   | B. Verify that the farm maintains a vaccination record.   | 1   |  |  | No vaccines are used   |
|   |   | c. Where the veterinary health professional has listed a disease that does not have a commercially viable vaccine, or when an existing vaccination has not been administered (for whatever reason), request that the veterinary health professional supplies a written rationale for avoiding vaccination in the vaccination record.   | C. If a vaccine exists for a regional disease but was not administered, ensure that the farm's health professional provided a rationale. Consult outside expert for a second opinion if the rationale is unusual or weak. | 1   |  |  | Farm management and veterinarian is updated of vaccine and possibilities, vaccine treatments will be used when actual  |
| <b>PRINCIPLE 5: USE RESOURCES IN AN ENVIRONMENTALLY EFFICIENT AND RESPONSIBLE MANNER</b>  |   |  |   |   |  |  |  |
| <i>Criterion 5.1 Traceability and transparency of raw materials in feed</i>   |   |  |   |   |  |  |  |
|   |   | <b>Compliance Criteria (Required Client Actions):</b>  |   | <b>Auditor Evaluation (Required CAB Actions):</b> |  |  |  |
| <b>Instruction to Clients and CABs for Auditing Indicators 5.1.1 through 5.4.4 - Sourcing of Responsibly Produced Trout Feeds</b> |   |  |   |   |  |  |  |
| 5.1.1   | <b>Indicator:</b> Evidence of traceability, demonstrated by the feed producer, of feed ingredients that make up more than 1% of the feed [28]<br><br><b>Requirement:</b> Yes<br><br><b>Applicability:</b> All   | a. From each feed producer obtain a list of all ingredients representing more than 1% by weight of the feed as specified in Indicator 5.1.2 (below).   | A. Confirm that the farm obtains relevant ingredient lists for all feeds used (also see 5.1.2a).  | 1   |  |  | A list of feed ingredients in quality system MODM 7.1.1.1 rev 0, include all raw materials and suppliers of raw material. Feed is supplied only from own feed production Az. Agricola Erede Rossi Silvio di Rossi Niccola, GlobalGAP certified valid until 13.1.2015 |
|   |   | b. For all feed ingredients identified in 5.1.1.a, provide copies of third-party documentation showing certified traceability of the production site and (for fish products), fishing area, landing site, species and harvest method.  | B. Verify that farm has a copies of certificates from the feed manufacturer demonstrating chain of custody capable of tracing back to fishing area, landing site, species and harvest method                              | 1   |  |  | There is a certificate for traceability from supplier to feed factory for all raw material   |
|   |   | c. For three ingredients of marine origin (fewer if fewer are used), collate three examples of traceback procedures conducted by a third-party auditor for the selected feed ingredients to the point of landing and vessel in the source fishery.   | C. Review examples of tracebacks for completeness and confirm compliance.   | 1   |  |  | Fish meal and fish oil are traced back to producer and landing of product  |
|   |   | d. For producers wishing to source from a feed manufacturer using a mass balance approach, provide a report from an on-site third-party audit of the feed manufacturer to assure traceability as in 5.1.1.b.   | D. Verify that audit reports contain evidence of appropriate mass-balance records and procedures at the feed manufacturer (if applicable).  |   |  |  | 1  |
| Footnote  |   | [28] Traceability should be at a level of detail that permits the feed producer to demonstrate compliance with the requirements in this document (i.e., marine raw ingredients must be traced back to the fishery, soy to the region grown, etc.). Feed manufacturers will need to supply the farm with third-party documentation  |   |   |  |  |  |
| 5.1.2   | <b>Indicator:</b> Presence of a list of all ingredients that make up more than 1% of the feed<br><br><b>Requirement:</b> Yes<br><br><b>Applicability:</b> All   | a. Obtain a statement from each feed supplier (on company letterhead) identifying all feed ingredients that make up more than 1% of the feed by weight. Market names must be accompanied by scientific latin names for natural ingredients and formal chemical nomenclature for synthetic products.  | A. Confirm that the producer has lists of ingredients for all feeds using appropriate nomenclature and cross-check a subsample of ingredient lists against feed bags during on-site inspection.                           | 1   |  |  | All feed ingredients from feed labels are described in feed list   |
|   |   |  | B. During the on-site inspection, cross-check a subsample of ingredient lists against feed bags.  | 1   |  |  | Feed ingredients from feed labels from farm are described in feed list, as seen for Rossiole GDO 05P, lotto SBRO1/14R  |
| <i>Criterion 5.2 Responsible origin of marine raw materials</i>   |   |  |   |   |  |  |  |
|   |   | <b>Compliance Criteria (Required Client Actions):</b>  |   | <b>Auditor Evaluation (Required CAB Actions):</b> |  |  |  |
| <b>Instruction to Clients for Indicator 5.2.1 - Feeds Containing Products that are Certified under an ISEAL-Accredited Scheme</b> |   |  |   |   |  |  |  |

|   |   |  |  |   |   |   |   |
|---|---|--|--|---|---|---|---|
| 5.2.1   | <p><b>Indicator:</b> Percentage of fishmeal and fish oil used in feed that comes from fisheries [29] certified under a scheme that is ISEAL-accredited and has guidelines that specifically promote responsible environmental management of small pelagic fisheries</p> <p><b>Requirement:</b> 10% within three years of publication of the ASC Freshwater Trout Standard [7 February 2013] and 100% within five years</p> <p><b>Applicability:</b> All</p> | <p>a. Prepare a policy stating the company's support of efforts to shift feed manufacturers purchases of fishmeal and fish oil to fisheries certified under a scheme that is an ISEAL member and has guidelines that specifically promote responsible environmental management of small pelagic fisheries. Include supporting text from the relevant portion of the certification scheme showing management unique to small pelagics.</p>  | <p>A. Verify that the client's policy supports responsible feed sourcing (e.g. programs at <a href="http://www.sealalliance.org/portal/full#20member">http://www.sealalliance.org/portal/full#20member</a>).</p> | 1   |   |   | Client's policy supports responsible feed sourcing, seen from 15.4.2014                                 |
|   |   | <p>b. Prepare a letter stating the farm's intent to preferentially source feed containing fishmeal and fish oil originating from fisheries certified under the type of certification scheme in 5.2.1a and inform all feed suppliers.</p>   | <p>B. Verify that the client has prepared a letter of intent and has notified feed all its suppliers accordingly.</p>  | 1   |   |   | Feed supplier is only from own produced feed, policy is written   |
|   |   | <p>c. Use feed inventory and feed supplier declarations in 5.2.1a to develop a list of the origin of all fish products used as feed ingredients.</p>   | <p>C. Confirm that the farm has sufficient evidence for the origin of all fish products in feed to demonstrate compliance with indicator 5.2.1.</p>  | 1   |   |   | The origin of all fish products in feed is described in feed list                                       |
|   |   | <p>d. Use the list from 5.2.1c to identify which fishmeal and fish oil feed ingredients come from fisheries certified under a scheme that is ISEAL-accredited and has guidelines that specifically promote responsible environmental management of small pelagic fisheries.</p>  | <p>D. Confirm that the farm identifies which ingredients are certified as described in 5.2.1d.</p>   |   |   | 1 | The origin of all fish products in feed is described in feed list, they are not identified if certified |
|   |   | <p>e. Starting 7 February 2016, provide evidence that the volume of certified ingredients (result from 5.2.1d) is ≥ 10% of the total volume of fishmeal and fish oil ingredients (result from 5.2.1c).</p>   | <p>E. As of 7 February 2016, review evidence and confirm compliance. Prior to 7 February 2016, 5.2.1e does not apply.</p>  |   |   | 1 |   |
|   |   | <p>f. Starting 7 February 2018, provide evidence that 100% of fishmeal and fish oil used in feed come from certified fisheries as per 5.2.1d.</p>  | <p>F. As of 7 February 2018, review evidence and confirm compliance. Prior to 7 February 2018, 5.2.1E applies.</p>   |   |   | 1 |   |
| Footnote  | [29] This standard applies to fishmeal and oil from forage fisheries and not to by-products or trimmings used in feed.  |  |  |   |   |   |   |
| 5.2.2   | <p><b>Indicator:</b> Prior to 100% achievement of 5.2.1, the FishSource [30] score required for the fisheries from which marine raw material in feed is derived (excluding trimming and by-products)</p> <p><b>Requirement:</b> All individual scores ≥ 6, and biomass score ≥ 8</p>  | <p><b>Instruction to Clients for Indicator 5.2.2 - FishSource Score of Products Used in Feed</b></p> <p>a. Provide a FS score for each fish species identified as a feed ingredient (see 5.1.2a) for all feeds used by the farm during the last 12 months. For first audits, farm records must cover ≥ 6 months.</p>   |  | <p>A. Verify that the farm obtains FS scores for all fish species listed as feed ingredients.</p>   |   | 1 | There is not provided a FishSource score for all fish species identified as a feed ingredient           |
|   |   |  |  | <p>B. For a subsample of fish species listed in 5.2.2a, use the FishSource online database to check the validity of the farm's FS scores for the time period within two months of the onsite audit.</p> | 1 |   | Fish source score is verified for Sprattus sprattus, micrometastius poutassou and ammodytes             |
| Footnote  | [30] Fishsource scores and their methodology are available here: <a href="http://www.fishsource.org/site">http://www.fishsource.org/site</a> . While the score must be counted using Fishsource methodology, Fishsource itself does not need to calculate the score.  |  |  |   |   |   |   |
| 5.2.3   | <p><b>Indicator:</b> Prior to 100% achievement of 5.2.1, demonstration of chain of custody and traceability for fisheries products in feed through an ISEAL-accredited or ISO 65-compliant certification scheme that incorporates the United Nations Food and Agriculture Organization's "Code of Conduct for Responsible Fisheries"</p>  | <p><b>Instruction to Clients for Indicator 5.2.3 - Third-Party Verification of Traceability</b></p> <p>a. Obtain from the feed supplier documentary evidence that the origin of all fishmeal and fish oil used in the feed is traceable via a third-party verified chain of custody or traceability program.</p>   |  | <p>A. Review evidence and confirm that a third-party verified chain of custody or traceability program was used for the fishmeal and fish oil.</p>  | 1 |   | Certificates from fish products suppliers and GlobalGAP certification of feed mill                      |
|   |   | <p>b. Ensure that all species within the scope of the chain of custody or traceability program align with fish meal and fish oil ingredients used in the farm's feeds (consistent with 5.2.2.a and 5.3.1.a).</p>   |  | <p>B. Verify that the scope of the chain of custody audit matches ingredient lists for feeds.</p>   | 1 |   | All fishmeal and fish oil in is in traceability program   |
| 5.2.4   | <p><b>Indicator:</b> Evidence that by-product feed ingredients do not come from fish species that are categorized as vulnerable [31], endangered or critically endangered according to the IUCN Red List of Threatened Species [32]</p> <p><b>Requirement:</b> Yes</p>  | <p>Note: Instructions for searching the IUCN database are given under Indicator 2.1.3.</p> <p>a. Compile and maintain a list (as per 5.3.1a below) of the fishery of origin for all fishmeal and fish oil originating from by-products and trimmings.</p>  |  | <p>A. Review list and for consistency with 5.3.1a.</p>  | 1 |   | See 5.1.1.1.a   |
|   |   | <p>b. For each by-product species (5.2.4a) that is an ingredient of any feed used during the last 12 months, search the IUCN database to determine if it is categorized as vulnerable, endangered, or critically endangered. For first audits, farm records must cover ≥ 6 months.</p>   |  | <p>B. Confirm that the farm has identified all byproducts and cross-check a subsample of species to verify their IUCN Red List categorization.</p>  | 1 |   | The list of feed ingredients include fishery by-products from tuna and herring, not on IUCN red list    |
| Footnote  | [31] An exception is made for sub-populations of "vulnerable" species that can demonstrate healthy populations through a fishery certified by the Marine Stewardship Council, or approved by the technical committee of the IFFO Responsible Sourcing standard.   |  |  |   |   |   |   |
| Footnote  | [32] The IUCN reference can be found at <a href="http://www.iucnredlist.org/">http://www.iucnredlist.org/</a>   |  |  |   |   |   |   |
| Criterion 5.3 Dependency on wild-caught marine ingredients in feed [33] |   |  |  |   |   |   |   |
| Compliance Criteria (Required Client Actions):                          |   |  |  | Auditor Evaluation (Required CAB Actions):  |   |   |   |
| Footnote  | [1] The Forage Fish Depending Ratio requirement in Principle 5 is calculated for fish sizes of 30 grams or higher.  |  |  |   |   |   |   |
| Footnote  | [33] The FFDR requirements are calculated for fish weighing 30 grams and more.  |  |  |   |   |   |   |
| 5.3.1   | <p><b>Indicator:</b> Fishmeal Forage Fish Dependency Ratio (FFDRm) for grow-out (calculated using formulas in Appendix III, subsection 1)</p> <p><b>Requirement:</b> ≤1.5</p> <p><b>Applicability:</b> All</p>  | <p><b>Instruction to Clients for Indicator 5.3.1 - Calculation of Fish Meal FFDR</b></p> <p>a. Maintain a detailed inventory of the feed used including:</p> <ul style="list-style-type: none"> <li>- Quantities used of each formulation (kg);</li> <li>- Percentage of fish oil in each formulation used;</li> <li>- Source (fishery) of fish oil/EPA/DHA in each formulation used;</li> <li>- Percentage of oil in each formulation derived from trimmings; and</li> <li>- Supporting documentation and signed declaration from feed supplier.</li> </ul> |  | <p>A. Verify completeness of records and that values are stated in a declaration from the feed manufacturer.</p>  | 1 |   | The detailed inventory of the feed used is controlled by quality manager                                |
|   |   | <p>b. Calculate FFDRm using formulas in Appendix III. Exclude fish meal derived from rendering of seafood by-products (e.g. the "trimmings" from a human consumption fishery).</p>   |  | <p>B. Verify that relevant calculations were done correctly, byproducts were excluded in calculations and confirm the value complies with the standard. Include in public audit report.</p>             | 1 |   | Calculation of FFDRm from Rossi feed GDO 3P and 2P fullfill requirements <1,5                           |

| Note: Farms are allowed select one of two options (Option A or Option B) to demonstrate compliance with the requirements of Indicator 5.3.2. |  |  |   |   |             |  |   |
|--|--|--|---|---|-------------|--|---|
|  |  | Compliance Criteria (Required Client Actions):   | Auditor Evaluation (Required CAB Actions):  |   |             |  |   |
| 5.3.2<br>Option A  | <b>Option A</b>  | <b>Instruction to Clients for Indicator 5.3.2 Option A - Calculation of Fish Oil FFDRO</b>   |   |   |             |  |   |
|  | <b>Indicator:</b> Compliance with the following requirement:<br>Fish Oil Forage Fish Dependency Ratio (FFDRo) for grow-out (calculated using formulas in Appendix III, subsection 1) c<br><b>Requirement:</b> ≤2.95<br><b>Applicability:</b> All, but note that farms may choose to demonstrate compliance with either Option A or Option B under Indicator 5.3.2.                             | a. Inform the CAB whether the farm chooses <b>Option A</b> or <b>Option B</b> to show compliance. If Option A is selected, proceed directly to 5.3.2b below. Otherwise, skip to Option B in the next section.<br>b. Maintain a detailed inventory of the feed used as specified under 5.3.1a.  | A. Record which option the client chose and proceed to evaluate compliance with the applicable set of compliance criteria.<br>B. Verify completeness of records as done for 5.3.1A.   | 1<br>1  |             | Option A is used for calculation of FFDRO<br>See 5.3.1.a   |   |
|  |  | c. Calculate FFDRO using formulas for eFCR value as given in Appendix III.   | C. Verify that relevant calculations were done correctly, by-products were excluded in calculations and confirm the value complies with the requirement. Include in public audit report   | 1   |             | Calculation of FFDRO from Rossi feed GDO 3P and 2P fulfill requirements <2.95  |   |
| 5.3.2<br>Option B  | <b>Option B</b>  | <b>Instruction to Clients for Indicator 5.3.2 Option B - Calculation of EPA and DHA in Feed</b>  |   |   |             |  |   |
|  | <b>Indicator:</b> Compliance with the following requirement:<br>Maximum level of EPA/DHA content from marine sources as a percentage of fatty acids in the feed (excluding EPA/DHA from trimmings and by-products)<br><b>Requirement:</b> ≤2.95<br><b>Applicability:</b> All, but note that farms may choose to demonstrate compliance with either Option A or Option B under Indicator 5.3.2. | a. Inform the CAB whether the farm chooses <b>Option A</b> or <b>Option B</b> to show compliance. If Option B is selected, proceed directly to 5.3.2b below. Otherwise, return to Option A in the previous section.<br>b. Maintain a detailed inventory of the feed used as specified under 5.3.1a.<br>c. Calculate EPA/DHA percentage using formula in Section 2 of Appendix III.   | A. Record which option the client chose and proceed to evaluate compliance with the applicable set of compliance criteria.<br>B. Verify completeness of records as done for 5.3.1A.<br>C. Verify that relevant calculations were done correctly, by-products were excluded in calculations and confirm the value complies with the requirement. Include in public audit report  |   | 1<br>1<br>1 |  |   |
|  |  |  |   |   |             |  |   |
| <b>Criterion 5.4 Responsible origin of non-marine raw materials in feed</b>  |  |  |   |   |             |  |   |
|  |  | <b>Compliance Criteria (Required Client Actions):</b>  |   | <b>Auditor Evaluation (Required CAB Actions):</b>   |             |  |   |
| 5.4.1  | <b>Indicator:</b> Presence and evidence of a responsible sourcing policy for the feed manufacturer for feed ingredients that comply with internationally recognized moratoriums and local laws [34]<br><b>Requirement:</b> Yes<br><b>Applicability:</b> All  | Note: In determining whether the policies of a feed manufacturer fulfill the requirements of Indicator 5.4.1, the CAB may also consider evidence such as certificates issued by independent third-parties against relevant requirements covering   |   |   |             |  |   |
|  |  | a. Compile and maintain a list of all feed suppliers with contact information (see also 5.1.1a).   | A. Review feed supplier list and cross-check against feed purchases (see also 5.1.1a).  | 1   |             | Feed is supplied only from own feed production Az. Agricola Erede Rossi Silvio di Rossi Niccola  |   |
|  |  | b. Obtain from each feed manufacturer a copy of the manufacturer's responsible sourcing policy for feed ingredients showing how the company complies with recognized crop moratoriums and local laws [34].<br>c. Obtain copies of third-party audits of feed suppliers (5.1.1) and confirm that these show evidence that supplier's responsible sourcing policies are implemented.   | B. Review policies from each feed supplier to confirm required sourcing policy is in place.<br>C. Verify that the scope of third-party audits of feed suppliers includes review of policies and evidence of implementation.   | 1<br>1  |             | Feed supplier policy from 12.5.2014, confirm responsible sourcing of feed ingredients<br>Feed supplier policy has been audited   |   |
| Footnote   | [34] Specifically, the policy shall include that vegetable ingredients, or products derived from vegetable ingredients, must not come from the Amazon Biome as geographically defined by the Brazilian Soya Moratorium.  |  |   |   |             |  |   |
| 5.4.2  | <b>Indicator:</b> Percentage of soy ingredients that are certified by the Roundtable on Responsible Soy, or equivalent [35]<br><b>Requirement:</b> 100% within five years of publication of the ASC Freshwater Trout Standard 7 February 2013<br><b>Applicability:</b> All   | a. Prepare a letter stating the farm's intent to source 100% of its feed containing soya certified under the Roundtable for Responsible Soy (RTRS) or equivalent by 7 February 2013.<br>b. Notify feed suppliers of the farm's intent (5.4.2a) and keep record of confirmation (letter of recognition) from supplier that they have received the farm's letter of intent.<br>c. Obtain and maintain declarations from all feed suppliers detailing the origin of soya in the feeds.<br>d. Starting 7 February 2013, provide evidence that soya used in feed is certified by the RTRS or equivalent [77].   | A. Obtain a copy of the client's letter of intent.<br>B. Verify letter of recognition from supplier.<br>C. Confirm that the farm has sufficient evidence for the origin of soya products in feeds to demonstrate compliance with indicator 5.4.2 after 7 February 2013.<br>D. As of 7 February 2013 review evidence and confirm compliance. Prior to 7 February 2013, 5.4.2d does not apply.  | 1<br>1<br>1   |             | Feed supplier policy from 12.5.2014, confirm responsible sourcing of feed ingredients, this includes use of soya certified under the Roundtable for Responsible Soy (RTRS) or equivalent by 7 February 2013.<br>Feed is supplied only from own feed production Az. Agricola Erede Rossi Silvio di Rossi Niccola<br>Origin of soy is documented, no soy from Amazon, approved by COOP |   |
|  | Footnote   | [35] The technical governance structure of the ASC must approve any other certification scheme as equivalent.  |   |   |             |  |   |
|  | 5.4.3  | <b>Indicator:</b> Disclosure by the feed supplier of any ingredients that contain more than 0.9% transgenic [36] plant material<br><b>Requirement:</b> Yes   | <b>Instruction to Clients and Auditors for Indicator 5.4.3 - Disclosure of Feed Ingredients Containing Transgenic Plant Material</b>  |   |             |  |   |
|  |  |  | a. Obtain from feed suppliers a disclosure detailing all plant material used as feed ingredients (i.e. soya and others plants) and specify which of these ingredients contains >0.9% transgenic plant material by weight.   | A. Review feed supplier declarations to confirm that all suppliers have made a disclosure identifying any ingredient containing 0.9% transgenic plant material. | 1           |  | No raw material with content of more than >0.9% transgenic plant material by weight., analyze certificate for every delivery, seen ok soy delivery 4.2.2014 |
| Footnote   | [36] Transgenic: Containing genes altered by insertion of DNA from an unrelated species; this involves taking genes from one species and inserting them into another species to get that trait expressed in the offspring.   |  |   |   |             |  |   |
| 5.4.4  | <b>Indicator:</b> Disclosure by the farm to the direct purchasers of its harvested fish of any feed ingredients that have contained more than 0.9% transgenic material<br><b>Requirement:</b> Yes<br><b>Applicability:</b> All   | Note: for the purposes of Indicator 5.4.4, the direct purchaser or 'buyer' is considered to be the person or entity who makes payment to the producer in exchange for possession of harvested fish.  |   |   |             |  |   |
|  |  | a. For feeds with ingredients containing >0.9% transgenic plant material (i.e. those feeds specified in 5.4.3a), ensure that the farm can identify any harvested fish that were fed such products. If no such feeds were identified in 5.4.3a, then Indicator 5.4.4 is not applicable.<br>b. If applicable, prepare and maintain a current list of all buyers who purchase fish directly from the farm. The list must include contact details of buyers.<br>c. If applicable to harvested fish (see 5.4.4a), disclose to buyers (5.4.4b) any feeds used with ingredients containing >0.9% transgenic plant material. Maintain documentary evidence of disclosures. For first audits, farm records of disclosures must cover >6 months. | A. If applicable based on results of 5.4.3a, verify that the farm has a robust method for identifying harvested fish that were reared using said feeds.<br>B. Review the farm's list of buyers and cross-check with sales records and invoices (as applicable).<br>C. Verify evidence that the farm discloses to all buyers information about transgenic feeds. Cross-check the plant material list from feed supplier (5.4.3.a) to see that all transgenic plant ingredients were disclosed. |   | 1<br>1<br>1 | No use of GM material in feed<br>No use of GM material in feed<br>No use of GM material in feed  |   |
|  |  |  |   |   |             |  |   |
| <b>Criterion 5.5 Energy consumption and greenhouse gas emissions (on farm)</b>   |  |  |   |   |             |  |   |
|  |  | <b>Compliance Criteria (Required Client Actions):</b>  |   | <b>Auditor Evaluation (Required CAB Actions):</b>   |             |  |   |

|  |   | Instruction to Clients for Indicator 5.5.1 - Energy Use Assessment   |  |   |  |   |  |   |
|--|---|--|--|---|--|---|--|---|
| 5.5.1  | <b>Indicator:</b> Presence of records and evidence of all energy consumption on the farm (including electric power and fuels) and evidence of an energy use assessment of on-farm energy consumption<br><br><b>Requirement:</b> Yes, measured in kilojoule/mt fish/year<br><br><b>Applicability:</b> All                  | a. Maintain records for all energy consumption on the farm by source (fuel, electricity) throughout the year.  | A. Verify that the farm maintains records for energy consumption.  | 1   |  |   | There is maintained records for energy consumption, as seen in Calc olo Consumi Energia 2013 Sefro   |   |
|  |   | b. Use results from 5.5.1a and relevant conversion factors to calculate the farm's total energy consumption in kilojoules (kj) during the last 12 months.  | B. Review the farm's calculations for total energy use and cross-check against farm records for energy consumption.  | 1   |  |   | Farms calculation Energy, for total energy using calculation from electricity and diesel fuel, resulting in KJ per produced tons of fish   |   |
|  |   | c. Calculate the total weight of fish produced (in metric tons, mt) during the last 12 months.   | C. Cross-check the farm's reported annual production against other farm data sets (e.g. harvest counts, escapes, and mortalities) to confirm accuracy (see 2.5.4 and 4.1.5).                         | 1   |  |   | Total weight of fish verified  |   |
|  |   | d. Use the results of 5.5.1b divided by the results of 5.5.1c to calculate energy consumption on the farm in kilojoule/mt fish/year.   | D. Review the farm's energy use calculations to confirm accuracy and completeness.   | 1   |  |   | Calculation of energy kj/ton/year verified   |   |
|  |   | e. Provide the CAB with evidence that the farm has had an energy use assessment (see Instructions above) within the last 12 months.  | E. Verify that the farm has had an energy use assessment.  | 1   |  |   | Farm has an energy use assessment continuously   |   |
| <b>Criterion 5.6 Non-therapeutic chemical inputs</b> |   |  |  |   |  |   |  |   |
|  |   | <b>Compliance Criteria (Required Client Actions):</b>  |  | <b>Auditor Evaluation (Required CAB Actions):</b> |  |   |  |   |
| 5.6.1  | <b>Indicator:</b> Percentage of combustibles contained in waterproof bunds<br><br><b>Requirement:</b> 100%  | a. Maintain a written list of all combustibles on the farm.  | A. Verify that the farm has a complete list of combustibles on the premises.   | 1   |  |   | Total list of all combustibles and chemicals in MODM 6.4.3, rev. 00, 24.1.2014   |   |
|  |   | b. Ensure that all combustibles are stored in waterproof bunds.  | B. Verify the storage locations of combustibles with responsible staff and confirm that combustibles are stored in waterproof bunds during the on-site inspection.                                   | 1   |  |   | Storage of combustibles as diesel oil and lubricating oil for machines, list of chemicals in original containers locked room   |   |
| 5.6.2  | <b>Indicator:</b> Percentage of chemicals stored in impermeable containers or buildings<br><br><b>Requirement:</b> 100%   | a. Maintain a detailed list of all chemicals or therapeutants on the farm.   | A. Verify that the farm has a complete list of chemicals and therapeutants on the premises.  | 1   |  |   | List of chemicals for chemicals used in Fish Health Plan   |   |
|  |   | b. Ensure that all chemicals or therapeutants are stored in impermeable containers or buildings.   | B. Verify the storage locations of chemicals with responsible staff and confirm during the on-site inspection that all chemicals or therapeutants are stored in impermeable containers or buildings. | 1   |  |   | Storage location for chemicals is appropriate  |   |
| 5.6.3  | <b>Indicator:</b> Percentage of used lubricants recycled or turned over to a waste management company<br><br><b>Requirement:</b> 100%<br><br><b>Applicability:</b> All  | a. Prepare a written policy explaining how used lubricants are recycled or turned over to a waste management company. If no waste management company exists, obtain a signed letter from the government agency in charge of waste disposal at the provincial/state level as confirmation.  | A. Verify policy with responsible staff and observe waste containers in use during the on-site inspection. Or, examine letter of confirmation if relevant.   | 1   |  |   | Waste policy is implemented, described in O.P 7.5.7.A. Waste is handled as regulation and sorted in plastic, metal, toner, carton, mix plastic and paper and machine and transported by special authorized companies |   |
|  |   | b. Where waste is collected by a waste management company, maintain receipts of payment for services.  | B. Verify that the farm has records of payment to waste management company.  | 1   |  |   | Payment for each delivery, seen ok   |   |
| 5.6.4  | <b>Indicator:</b> Percentage of chemical containers reused or turned over to a waste management company<br><br><b>Requirement:</b> 100%<br><br><b>Applicability:</b> All  | a. Prepare a written policy explaining how the chemical containers are reused or turned over to a waste management company. If no waste management company exists, obtain a signed letter from the government agency in charge of waste disposal at the local level as confirmation that neither public nor private waste disposal services are available.                                     | A. Verify policy with responsible staff and observe waste containers in use during the on-site inspection. Or, examine letter of confirmation if relevant.   | 1   |  |   | Farm protocol for management of waste, OP 7.5.7.A includes handling of waste containers  |   |
|  |   | b. Where containers are re-used, maintain records of chemical purchases and demonstrate tallied alignment against the number of containers in re-use/re-cycled.  | B. Verify container tally based on record of chemical purchases versus containers in use/re-cycled.  | 1   |  |   | Reused containers are registered   |   |
|  |   | -  | C. Verify that the farm has records of disposal or payment to waste disposal company.  | 1   |  |   | Records of waste ok  |   |
| 5.6.5  | <b>Indicator:</b> Percentage of non-hazardous, non-recyclable wastes turned over to a waste management company or landfill [37]<br><br><b>Requirement:</b> 100%<br><br><b>Applicability:</b> All  | a. Prepare a written farm policy explaining how and which non-hazardous, non-recyclable wastes are turned over to a waste management company or buried on-site. If no waste management company exists, obtain a signed letter from the government agency in charge of waste disposal at the local level as confirmation that neither public nor private waste disposal services are available. | A. Verify farm policy with responsible staff and examine handling of non-hazardous, non-recyclable wastes during the on-site inspection. Or, examine letter of confirmation if relevant.             | 1   |  |   | Farm protocol for management of waste, OP 7.5.7.A includes handling of non-hazardous, non-recyclable wastes  |   |
|  |   | b. For on-site burial of waste, show that an outside expert (hired groundwater or geology consultant with minimum of five years experience and university degree, or academic groundwater geologist) has signed a letter affirming that waste burial poses no risk of contamination to surface and underground waters. Maintain CV of outside expert on file for possible inspection.          | B. Verify that farm has letter affirming lack of impacts to freshwater due to buried waste protocols by an expert with the stated credentials.   |   |  | 1 |  | No burial of waste on site                  |
|  |   | c. Include a statement in the farm waste disposal policy (5.6.5a) which prohibits the burning of non-hazardous, non-recyclable wastes.   | C. Verify that burning is covered in the farm policy. During the audit, inspect the farm to verify there is no evidence of burning waste materials (not allowed).                                    |   |  |   | 1  | No burning of waste material                |
|  |   | d. Where waste is collected by a waste management company, maintain receipts of payment for services.  | D. Verify that the farm has records of payment to waste disposal company.  |   |  | 1 |  | Records of payments to authorized companies |
|  |   | e. Where waste collection is a public service, show schedule of collections.   | E. Verify waste collection schedule.   |   |  | 1 |  | Waste collection schedule for all materials |
| Footnote   | [37] In case of absence of a managed landfill in the area, farms are allowed to bury non-hazardous solid wastes on site, provided all precautions have been taken to prevent the contamination of surrounding surface and underground waters. Wastes that are not biodegradable must not be burned on site because of the |  |  |   |  |   |  |   |
| 5.6.6  | <b>Indicator:</b> Demonstration that a farmer is aware of recycling facilities that are accessible to the farm and demonstration of a commitment to use those facilities<br><br><b>Requirement:</b> Yes<br><br><b>Applicability:</b> All  | a. Provide a list of the three closest recycling facilities for relevant farm products (regardless of how far away these may be). Provide the auditor with contact information for the local waste management agency.  | A. Contact the local waste management agency to determine accessibility of the three closest recycling facilities that were identified by the farm.  | 1   |  |   | List of authorized companies for waste management  |   |
|  |   | b. Prepare a written statement articulating the farm's commitment to recycle waste from production.  | B. Review the farm's statement of commitment to use those recycling facilities that are accessible to the farm.  | 1   |  |   | Recycling of materials is described in Farm protocol for management of waste, OP 7.5.7.A   |   |
|  |   | c. Provide a description of the types of production waste materials and how these are either disposed of, or recycled.   | C. During the on-site visit, interview relevant staff and make direct observations to confirm that farm recycling procedures are implemented.  | 1   |  |   | Staff are fully aware of recycling procedures  |   |
|  |   | d. Inform CAB of any infractions or fines for improper waste disposal received during the previous 12 months and corrective actions taken.   | D. Review infractions and corrective actions, if any.  | 1   |  |   |  |   |

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| PRINCIPLE 6: BE SOCIALLY RESPONSIBLE                      |   |   |                            |  |  |
| Criterion 6.1 Child labor                                 |   |   |                            |  |  |
| Compliance Criteria                                       |   |   |                            |  |  |
| 6.1.1   | Indicator: Number of incidences of child [38] labor [39]<br>Requirement: None   | Note: In most countries, the law states that minimum age for employment is 15 years. There are two possible exceptions:<br>a. Minimum age of permanent workers is 15 or older (except in countries as noted above).<br>b. Employer maintains age records for employees that are sufficient to demonstrate compliance.   | 1<br>1                     |  | No worker below minimum legal age (16 in Italy).<br>Employer maintains copy of ID document for each worker upon hiring.  |
| Footnote  | [38] Child: Any person under 15 years of age. A higher age would apply if the minimum age law of an area stipulates a higher age for work or mandatory schooling.   |   |                            |  |  |
| Footnote  | [39] Child labor: Any work by a child younger than the age specified in the definition of a child.  |   |                            |  |  |
| Footnote  | [40] Young worker: Any worker between the maximum age of a child, as defined above, and under the age of 18.  |   |                            |  |  |
| Footnote  | [41] Hazard: The inherent potential to cause injury or damage to a person's health (e.g., being unequipped to handle heavy machinery safely and unprotected exposure to harmful chemicals). Hazardous work: Work that, by its nature or circumstances in which it is carried out, is likely to harm the health, safety or morals      |   |                            |  |  |
| Criterion 6.2 Forced, bonded or compulsory labor          |   |   |                            |  |  |
| Compliance Criteria                                       |   |   |                            |  |  |
| 6.2.1   | Indicator: Number of incidences of forced [42], bonded [43] or compulsory labor<br>Requirement: None<br>Applicability: All  | a. Contracts are clearly stated and understood by employees. Contracts do not lead to workers being indebted (i.e. no 'pay to work' schemes through labor contractors or training credit programs).<br>b. Employees are free to leave workplace and manage their own time.<br>c. Employer does not withhold employee's original identity documents.<br>d. Employer does not withhold any part of workers' salaries, benefits, property or documents in order to oblige them to continue working for employer.<br>e. Employees are not to be obligated to stay in job to repay debt.<br>f. Maintain payroll records and be advised that workers will be interviewed to confirm the above.  | 1<br>1<br>1<br>1<br>1<br>1 |  | Contracts are based on standard practice and make reference to applicable collective bargaining agreement for agricultural sector.<br>Workers interviews and observations during audit confirm freedom of movement.<br>No original identity documents found in personnel files. Workers interviewed confirmed this.<br>No deductions found or other means to force workers into staying at the job, as confirmed during interviews.<br>No evidence of debts to the employer. Employer provides housing to some workers free of charge.<br>Payroll records available and reviewed on a sample basis, also confirmed with workers during interviews. |
| Footnote  | [42] Forced (Compulsory) Labor: All work or service that is extracted from any person under the menace of any penalty for which a person has not offered himself/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         |   |                            |  |  |
| Footnote  | [43] Bonded labor: When a person is forced by the employer or creditor to work to repay a financial debt to the crediting agency.   |   |                            |  |  |
| Criterion 6.3 Discrimination [44] in the work environment |   |   |                            |  |  |
| Compliance Criteria                                       |   |   |                            |  |  |
| 6.3.1   | Indicator: Evidence of proactive antidiscrimination practice [45]<br>Requirement: Yes<br>Applicability: All   | a. Employer has written anti-discrimination policy in place, stating [45] the company does not engage in or support 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.<br>b. Employer has clear and transparent company procedures that outline how to raise, file, and respond to discrimination complaints.<br>c. Employer respects the principle of equal pay for equal work and equal access to job opportunities, promotions and raises.<br>d. All managers and supervisors receive training on diversity and non-discrimination. All personnel receive non-discrimination training. Internal or external training is acceptable if proven effective. | 1<br>1<br>1<br>1           |  | Company Code of good conduct available and posted for the prevention of discrimination, affixed on notice boards. Company workforce include Italian and non-Italian workers.<br>Company Code of good conduct for the prevention of discrimination, includes procedure for how to file and manage a complaint. There is also a suggestion/communication box available for anonymous complaints.<br>The company applies collective bargaining agreement which requires equal treatment for job of equal value.<br>Small site, all workers receive communication on applicable policies and procedures.   |
| Footnote  | [45] Employers shall have written antidiscrimination policies stating the company does not engage in or support 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 |   |                            |  |  |
| 6.3.2   | Indicator: Number of incidences of discrimination<br>Requirement: None  | a. Employer maintains a record of all discrimination complaints. These records do not show evidence of discrimination.<br>b. Be advised that worker testimonies will be used to confirm 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.   | 1<br>1                     |  | No evidence of discrimination complaints. Interviews do not reveal issues.<br>Workers interviewed did not raise any discrimination issue, including non-Italian nationals.   |
| Criterion 6.4 Work environment health and safety          |   |   |                            |  |  |
| Compliance Criteria                                       |   |   |                            |  |  |
| 6.4.1   | Indicator: Percentage of workers trained in health and safety practices, procedures and policies<br>Requirement: 100%<br>Applicability: All   | a. Employer has documented practices, procedures (including emergency response procedures) and policies to protect employees from workplace hazards and to minimize risk of accident or injury. The information shall be available to employees.<br>b. Practices, policies and procedures are regularly revised to address workplace hazards that were identified in risk assessments (see Indicator 6.4.5, risk assessments revised at least annually).<br>c. Employees know and understand emergency response procedures.<br>d. Employer conducts health and safety training for all employees on a regular basis (once a year and immediately for all new employees), including training on potential hazards and risk minimization, Occupational Safety and Health (OSH) and effective use of PPE.  | 1<br>1<br>1<br>1           |  | Mandatory risk assessment documentation was available and shared with workers' representative, also company safety procedures and instructions.<br>Risk assessment is revised or confirmed annually during the mandatory safety meeting.<br>Emergency response procedures are confirmed with workers at annual meetings.<br>Annual training on H&S performed, last records from 19 December 2013, including assessment in native language for foreign workers.   |
| 6.4.2   | Indicator: Evidence that health- and safety-related accidents are recorded and corrective actions are taken<br>Requirement: Yes   | a. Employer records all health- and safety-related accidents.<br>b. Employer maintains complete documentation for all occupational health and safety violations.<br>c. Employer implements corrective action plans in response to any accidents that occur. Plans are documented and they include an analysis of root cause, actions to address root cause, actions to remediate, and actions to prevent future accidents of  | 1<br>1<br>1                |  | Records of all health and safety accidents maintained as required by law.<br>Records of all health and safety accidents maintained as required by law.   |

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|  | Applicability: All | d. Employees working in departments where accidents have occurred can explain what analysis has been done and what steps were taken or improvements made. | 1 |  |  | No significant accidents in recent period, recorded accidents were due to slippery or travel incidents. |
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| 6.4.3   | <p><b>Indicator:</b> Proof of company accident insurance covering employee costs stemming from a job-related accident or injury when not covered under national law</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>   | <p>a. Employer maintains documentation to confirm that all personnel are provided sufficient insurance to cover costs related to occupational accidents or injuries (if not covered under national law). Equal insurance coverage must include temporary, migrant or foreign workers. Written contract of employer responsibility to cover accident costs is acceptable evidence in place of insurance.</p>   | 1 |  |  |  | All workers are covered by national mandatory insurance and workers confirmed regularly.  |
| 6.4.4   | <p><b>Indicator:</b> Workers use and have access to appropriate personal protective equipment (PPE)</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>   | a. Employer maintains a list of all health and safety hazards (e.g. chemicals).   | 1 |  |  |  | A list is available of chemical substances used and their risks. MSDS also available.   |
|   |   | b. Employer provides workers with PPE that is appropriate to known health and safety hazards.   | 1 |  |  |  | PPE issued to workers include goggles and gloves for chemical handling, gloves for cutting, safety shoes.                       |
|   |   | c. Employees receive annual training in the proper use of PPE (see 6.4.1d).   | 1 |  |  |  | Annual training on H&S include use of PPE   |
|   |   | d. Be advised that workers will be interviewed to confirm the above.  | 1 |  |  |  | Workers interviewed confirmed training, availability of PPE and company monitoring on their use                                 |
| 6.4.5   | <p><b>Indicator:</b> Evidence of a health and safety assessment of site facilities and processes</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>  | a. Employer makes regular assessments of hazards and risks in the workplace. Risk assessments are reviewed and updated at least annually (see also Indicator 6.4.1).  | 1 |  |  |  | H&S risk assessment performed and updated or confirmed annually during mandatory safety meeting.                                |
|   |   | b. Employees are trained in how to identify and prevent known hazards and risks (see also 6.4.1d).  | 1 |  |  |  | Company procedures following the risk assessment are discussed and presented during annual training                             |
|   |   | c. Health and safety procedures are adapted based on results from risk assessments (above) and changes are implemented to help prevent accidents.   | 1 |  |  |  |   |
| <b>Criterion 6.5 Wages</b>  |   |   |   |  |  |  |   |
| <b>Compliance Criteria</b>  |   |   |   |  |  |  |   |
| 6.5.1   | <p><b>Indicator:</b> The percentage of employees who are paid a basic needs wage [46].</p> <p><b>Requirement:</b> 100%</p> <p><b>Applicability:</b> All</p>   | a. Employer keeps documents to show the legal minimum wage in the country of operation. If there is no legal minimum wage in the country, the employer keeps documents to show the industry-standard minimum wage.  | 1 |  |  |  | Company applies collective bargaining agreement setting wage levels. Information is publicly available.                         |
|   |   | b. Employer's records (e.g. payroll) confirm that worker's wages for a standard work week (≤ 48 hours) always meet or exceed the legal minimum wage. If there is no legal minimum wage, the employer's records must show how the current wage meets or exceeds industry standard. If wages are based on piece-rate or pay-per-production, the employer's records must show how workers can reasonably attain (within regular working hours) wages that meet or exceed the legal minimum wage. | 1 |  |  |  | Records indicate that company applies wage rates set by applicable collective bargaining agreement for the agricultural sector. |
|   |   | c. Employer maintains documentary evidence to show compliance (e.g. payroll, timesheets, punch cards, production records, and/or utility records). Be advised that workers will be interviewed to confirm the above.  | 1 |  |  |  | Payroll records maintained and also registrations from attendance recording system  |
|   |   | d. Proof of employer engagement with workers and their representative organizations, and the use of cost of living assessments from credible sources to assess basic needs wages. Includes review of any national basic needs wage recommendations from credible sources such as national universities or government.   | 1 |  |  |  | Company applies wage rates set by applicable collective bargaining agreement for the agricultural sector.                       |
|   |   | e. Employer has calculated the basic needs wage for farm workers and has compared it to the basic (i.e. current) wage for their farm workers.   | 1 |  |  |  | Collective bargaining agreement provides for higher rates than basic needs wage.  |
|   |   | f. Employer demonstrates how they ensure paying a basic needs wage to their workers.  | 1 |  |  |  | Collective bargaining agreement provides for higher rates than basic needs wage.  |
| Footnote  | [46] Basic needs wage: Enables workers to support the average-sized family above the poverty line, based on local prices near the workplace. Basic needs include essential expenses (e.g., food, clean water, clothes, shelter, transportation and education), a discretionary income, as well as legally mandated social benefits  |   |   |  |  |  |   |
| 6.5.2   | <p><b>Indicator:</b> Evidence of transparency in wage setting</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>   | a. Wages and benefits are clearly articulated to workers and documented in contracts.   | 1 |  |  |  | Contracts make reference to the applicable CBA setting out wages and employment conditions.                                     |
|   |   | b. The method for setting wages is clearly stated and understood by workers.  | 1 |  |  |  | Wages are defined by the applicable CBA depending on job role and clearly communicated to workers.                              |
|   |   | c. Employer renders wages and benefits in a way that is convenient for the worker (e.g. cash, check, or electronic payment methods). Workers do not have to travel to collect benefits nor do they receive promissory notes, coupons or merchandise in  | 1 |  |  |  | Wages are rendered through bank transfer.   |
|   |   | d. Be advised that workers will be interviewed to confirm the above.  | 1 |  |  |  | Confirmed by workers during interviews.   |
| Footnote  | [47] A legal minimum wage will be considered a basic needs wage if it is set in a manner consistent with the intent of ensuring basic needs are met. In instances where there is no legal minimum wage, or a legal minimum that is not set in the spirit of a basic needs wage, the auditor must determine an appropriate proxy for |   |   |  |  |  |   |
| <b>Criterion 6.6 Access to freedom of association and the right to collective bargaining [48]</b> |   |   |   |  |  |  |   |
| <b>Compliance Criteria</b>  |   |   |   |  |  |  |   |
| Footnote  | [48] Bargain collectively: A voluntary negotiation between employers and organizations of workers to establish the terms and conditions of employment by means of collective (written) agreements.  |   |   |  |  |  |   |
| 6.6.1   | <p><b>Indicator:</b> Incidences of employees denied freedom to associate, the ability to bargain collectively or denied access to representatives, or representative organizations, chosen by workers</p> <p><b>Requirement:</b> 0 (zero)</p> <p><b>Applicability:</b> All</p>  | a. Workers have the freedom to join any trade union, free of any form of interference from employers or competing organizations set up or backed by the employer.   | 1 |  |  |  | No interference from management on rights to freedom of association. Several workers are members to a TU.                       |
|   |   | b. Union representatives are chosen by workers without managerial interference. ILO specifically prohibits "acts which are designated to promote the establishment of worker organizations or to support worker organizations under the control or employers or employers' organizations."  | 1 |  |  |  | No elected trade union representative, only representative for safety matters. External representatives exist though.           |
|   |   | c. Trade union representatives have access to their members in the workplace at reasonable times on the premises.   | 1 |  |  |  | External representatives have access to workers.  |
|   |   | d. Employment contract explicitly states the worker's right of freedom of association.  | 1 |  |  |  | Company applies CBA and contract makes explicit reference.  |
|   |   | e. Employer has explicitly communicated a commitment to ensure the collective bargaining rights of all workers.   | 1 |  |  |  | Company applies CBA and contract makes explicit reference.  |
|   |   | f. Local trade union, or where none exists a reputable civil-society organization, confirms no outstanding cases against the farm site management for violations of employees' freedom of association and collective bargaining rights.   | 1 |  |  |  | Confirmed by workers member to TU.  |
|   |   | g. There is documentary evidence that workers are free and able to bargain collectively (e.g. collective bargaining agreements, meeting minutes, or complaint resolutions).   | 1 |  |  |  | Company applies national and local CBA.   |
|   |   | h. Be advised that workers will be interviewed to confirm the above.  | 1 |  |  |  | Confirmed by workers interviewed.   |
| <b>Criterion 6.7 Disciplinary practices</b>   |   |   |   |  |  |  |   |
| <b>Compliance Criteria</b>  |   |   |   |  |  |  |   |
| 6.7.1   | <p><b>Indicator:</b> Incidences of abusive disciplinary actions</p> <p><b>Requirement:</b> None</p>   | a. Employer does not use threatening, humiliating or punishing disciplinary practices that negatively impact a worker's physical and mental health or dignity.  | 1 |  |  |  | No evidence or suggestion of improper treatment of workers.   |
|   |   | b. Allegations of corporeal punishment, mental abuse [50], physical coercion, or verbal abuse will be investigated by auditors.   | 1 |  |  |  | No allegation from workers' testimony or records.   |
|   |   | c. Be advised that workers will be interviewed to confirm there is no evidence for excessive or abusive disciplinary actions.   | 1 |  |  |  | No allegation from workers' testimony or records.   |

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| 6.7.2   | <p><b>Indicator:</b> Evidence of nonabusive disciplinary policies and procedures whose aim is to improve the workers' performance [49].</p> <p><b>Requirement:</b> Yes</p>  | <p>a. Employer has written policy for disciplinary action which explicitly states that its aim is to improve the worker [49].</p> <p>b. Maintain documentary evidence (e.g. worker evaluation reports) and be advised that workers will be interviewed to confirm that the disciplinary action policy is fair and effective.</p>  | 1  |   |  | <p>Applicable disciplinary practices are regulated in the applicable collective bargaining agreement.</p> <p>No disciplinary action recorded, as confirmed by workers during interviews.</p>  |  |
| Footnote  | [49] If disciplinary action is required, progressive verbal and written warnings shall be engaged. The aim should always be to improve the worker before letting him/her go. (Indicated by policy statements as well as evidence from worker testimony.)  |   |  |   |  |   |  |
| Footnote  | [50] Mental abuse: Characterized by the intentional use of power, including verbal abuse, isolation, sexual or racial harassment, intimidation or threat of physical force.   |   |  |   |  |   |  |
| <b>Criterion 6.8 Overtime and working hours</b>                 |   |   |  |   |  |   |  |
| <b>Compliance Criteria</b>                                      |   |   |  |   |  |   |  |
| 6.8.1   | <p><b>Indicator:</b> Violations or abuse of working hours [51] and overtime [52] laws and agreements</p> <p><b>Requirement:</b> None</p> <p><b>Applicability:</b> All</p>   | <p>a. Employer has documentation showing the legal requirements for working hours and overtime in the region where the farm operates. If local legislation allows workers to exceed internationally accepted recommendations (48 regular hours, 12 hours overtime) then requirements of the international standards apply.</p> <p>b. Records (e.g. time sheets and payroll) show that farm workers do not exceed the number of working hours allowed under the law.</p> <p>c. Payment records (e.g. payslips) show that workers are paid a premium rate [53] for overtime hours.</p> <p>d. Overtime is limited and occurs in exceptional circumstances as evidenced by farm records (e.g. production records, time sheets, and other records of working hours).</p> <p>e. If an employer requires employees to work shifts at the farm (e.g. 10 days on and six days off), the employer compensates workers with an equivalent time off in the calendar month and there is evidence that employees have agreed to this schedule (e.g. in the hiring contract).</p> <p>f. Be advised that workers will be interviewed to confirm there is no abuse of working hours and overtime laws.</p> | 1  |   |  | <p>National law and collective bargaining agreement apply for maximum working hours.</p> <p>Time records maintained for entry and exit. No evidence of excessive hours.</p> <p>Premium rates are applied for overtime as required by applicable CBA, depending on kind of overtime (ordinary day, festive day, etc)</p> <p>Overtime is limited and voluntary, as confirmed by workers.</p> <p>Records show that workers always enjoy at least one day off in every week.</p> <p>Workers confirm they always enjoy at least one day off in every week.</p> |  |
| Footnote  | [51] Working hours (a. k. a. normal work week) can be defined by law but shall not exceed 48 hours on a regular basis (i.e., constantly or the majority of the time). Variations based on seasonality may apply but personnel shall be provided with at least one day off in every seven-day period.                  |   |  |   |  |   |  |
| Footnote  | [52] All overtime shall be paid at a premium and should not exceed 12 hours per week. In the case of exceptional or emergency events, additional overtime hours are permitted. In such exceptional cases, which must pose an acute and long-term threat to the farm, workers will receive a premium wage and an equal |   |  |   |  |   |  |
| Footnote  | [53] Premium rate: A rate of pay higher than the regular work week rate. Must comply with national laws/regulations and/or industry standards.  |   |  |   |  |   |  |
| <b>Criterion 6.9 Interactions with communities</b>              |   |   |  |   |  |   |  |
| <b>Compliance Criteria</b>                                      |   |   |  |   |  |   |  |
| 6.9.1   | <p><b>Indicator:</b> For new farms, evidence of engagement and consultation with surrounding communities about potential social impacts [54] from the farm</p>  | <p>Note: A 'new farm' is defined as an aquaculture operation where construction was completed after the publication date of the ASC Freshwater Trout Standard 7 February 2013 or a farm that underwent a significant expansion after said publication date.</p> <p>a. Provide evidence to show whether or not the farm fits the definition of a 'new farm' as used here. If yes, proceed to 6.9.1b. If not, then Indicator 6.9.1 does not apply to the farm.</p> <p>b. Provide results of a participatory Social Impact Assessment (p-SIA) or equivalent methodology as evidence of the farm's engagement and consultation with surrounding communities about potential social impacts from the farm. Mandatory for all</p> <p>c. Evidence provided in 6.9.1b should include minutes from community meetings and a log of communications with stakeholders. Consultations should address economic impacts, natural resource access and use, human health and safety issues, and</p>   |  |   |  | <p>1 NA, not a new farm</p> <p>1 NA, not a new farm</p> <p>1 NA, not a new farm</p>   |  |
| Footnote  | [54] Evidence could include minutes from community meetings and a log of communications with stakeholders. Social impacts to be discussed would likely include economic impacts, natural resource access and use, human health and safety issues, and changes to physical infrastructure and cultural issues, with a  |   |  |   |  |   |  |
| 6.9.2   | <p><b>Indicator:</b> Evidence of regular communication, engagement and consultation with surrounding communities</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>  | <p>a. The farm engages in consultations with the local community at least twice every year (bi-annually).</p> <p>b. Consultations are meaningful. OPTIONAL: the farm may choose to use participatory Social Impact Assessment (pSIA) or an equivalent method for consultations. Mandatory for all farm sites with greater than ten (10) staff/employees.</p> <p>c. Consultations include participation by elected representatives from the local community who were asked to contribute to the agenda.</p> <p>d. Maintain records and documentary evidence (e.g. meeting agenda, minutes, report) to demonstrate that consultations comply with the above.</p> <p>e. Be advised that representatives from the local community and organizations may be interviewed to confirm the above.</p>  | 1  |   |  | <p>Farm has open-door policy approach with local community. It is the only employer in the small community and workers are all local residents.</p> <p>In addition to open-door policy, company maintains regular relations with regulatory bodies at local, regional and national level, including for environmental permits and authorisations</p> <p>Company has also communicated formal availability for consultation with local authorities.</p>  |  |
| 6.9.3   | <p><b>Indicator:</b> Evidence of an operational grievance and conflict resolution mechanism to address community concerns</p> <p><b>Requirement:</b> Yes</p>  | <p>a. Farm policy provides a mechanism for presentation, treatment and resolution of grievances (i.e. complaints) lodged by stakeholders, community members, and organizations.</p> <p>b. The farm follows its policy for handling stakeholder grievances as evidenced by farm documentation (e.g. follow-up communications with stakeholders, reports to stakeholder describing corrective actions).</p> <p>c. The farm's mechanism for handling grievances is effective based on resolution of stakeholder complaints and community concerns (e.g. follow-up correspondence from stakeholders).</p> <p>d. Be advised that representatives from the local community, including complainants where applicable, may be interviewed to confirm the above.</p>   | 1  |   |  | <p>Complain procedure PRO8.2.1 rev.5 last updated on 16/05/14.</p> <p>1 No evidence of stakeholder grievances</p> <p>1 No evidence of stakeholder grievances</p> <p>1 No evidence of stakeholder grievances</p>   |  |
| *****   |   |   |  |   |  |   |  |
| <b>SECTION 7: REQUIREMENTS FOR FINGERLING AND EGG SUPPLIERS</b> |   |   |  |   |  |   |  |
| <b>Compliance Criteria</b>                                      |   |   |  |   |  |   |  |
| 7.1   | <p><b>Indicator:</b> Presence of documents issued by pertinent authorities proving compliance with local and national authorities on land and water use, effluent regulations and use of treatments</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All</p>   | <p>a. Obtain copies of supplier's business permit and land title deed.</p> <p>b. Obtain records from suppliers showing discharge permit requirements as required.</p> <p>c. Obtain records from suppliers showing treatments used on fingerlings and eggs.</p> <p>d. Maintain on-site copies of laws governing water use, land use, effluent regulations and chemical treatments for animals.</p>   | <p>A. Verify that farm obtains copies of business permits and land title deed from each supplier (if applicable).</p> <p>B. Verify that farm obtains records from suppliers to show compliance with discharge permit requirements.</p> <p>C. Verify that the farm obtains treatment records from its suppliers.</p> <p>D. Verify that farm obtains records from suppliers to show compliance with water extraction permit requirements, if applicable.</p> | 1 |  |   | <p>Supplier of fingerlings from own production, Fred dara, under certification for ASC Freshwater trout standard</p> <p>Discharge permit in compliance</p> <p>Treatment records at Quality Manager</p> <p>Water permits from Region Umbrien 4.7.2011</p> |

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| 7.2      | <b>Indicator:</b> New introductions of exotic species from the date of publication of the ASC Freshwater Trout Standard, unless the hatchery/fingerling facility is a closed production system [55]<br><b>Requirement:</b> None   | a. Obtain written evidence showing whether or not the fingerling and egg suppliers use closed production systems [55]. If yes, then Indicator 7.2 does not apply.<br>b. Obtain written evidence showing whether or not the fingerling and egg suppliers produce a non-native species. If not, then Indicator 7.2 does not apply.<br>c. If the supplier produces an exotic species, obtain written evidence that the species was widely commercially produced in the area before publication of the ASC Freshwater Trout Standard.  | A. Verify that the farm has evidence that their suppliers use only closed production systems [55]. Otherwise, proceed to 7.2B.<br>B. Verify that the farm has evidence that their suppliers do not produce a non-native species. Otherwise, proceed to 7.2C.<br>C. Verify that the farm has evidence showing that the exotic species in 7.2c was widely commercially produced in the area before publication of the ASC Freshwater Trout Standard.                                     | 1 |  |  | 1 | Not closed production system<br>Production of <i>Oncorhynchus mykiss</i> , not introduced after introduction of Standard                 |
| Footnote | [55] A closed production system is defined as a facility with recirculating water that is separated from the wild aquatic medium by effective physical barriers that are in place and well maintained to ensure no escapes of reared specimens or biological material that might survive and subsequently reproduce.  |  |  |   |  |  |   |  |
| 7.3      | <b>Indicator:</b> Allowance for siting in National Protected Areas [56]<br><b>Requirement:</b> None [57, 58]  | <b>Instruction to Clients for Indicator 7.3 - Exceptions to Requirements that Suppliers (fry/fingerlings) are not Sited in National Protected Areas</b><br>a. Obtain from suppliers of fingerlings and eggs a map showing the location of the operation relative to nearby protected areas as defined federally/at the National level.   | A. Review map and cross-check against supplier location.   | 1 |  |  |   | Location in protected area, authorization from 20.12.2012 from SIC Marcite di Norcia   |
| Footnote | [56] A protected area is "A clearly defined geographical space, recognized, dedicated and managed, through legal or other effective means, to achieve the long-term conservation of nature with associated ecosystem services and cultural values." Source: Dudley, N. (Editor) (2008), Guidelines for Applying Protected   |  |  |   |  |  |   |  |
| Footnote | [57] An exception is made for protected areas that are classified by IUCN, or the International Union for Conservation of Nature, as Category V or VI. These are areas preserved primarily for their landscapes, or areas that include sustainable resource management. Details can be found here:  |  |  |   |  |  |   |  |
| Footnote | [58] An exception is also made for farms located in protected areas that are designated as such after the farm already exists in that location. In these situations, the farm must demonstrate that its operation is compatible with the objectives of the newly protected area, and that it is in compliance with any relevant   |  |  |   |  |  |   |  |
| 7.4      | <b>Indicator:</b> Evidence of an assessment of the property for the presence of species listed on the International Union for Conservation of Nature (IUCN) "Red List of Threatened Species" as vulnerable, near threatened, endangered or critically endangered; an evaluation of the farm's impact on any such species present; and clearly defined mitigation measures to reduce any negative impacts and allow existence of such species<br><b>Requirement:</b> Yes | a. Prepare a letter informing egg and fingerling suppliers that the supplier must compile a list of IUCN Red Listed species in the relevant categories that may occur on their property following the instructions in Indicator 2.1.3.<br>b. Obtain from egg and fingerling suppliers a "risk assessment" (search and mitigation plan) that evaluates how the supplier's operation impacts on any IUCN Red Listed species identified in 7.4a. The risk assessment should be performed by an independent academic researcher or a nationally accredited EIA expert.<br>c. Obtain from egg and fingerling suppliers a copy of the supplier's ETP species response plan and protocols based on the findings of the risk assessment. | A. Verify that the farm sent a letter to egg and fingerling supplier(s) informing them of requirements to compile the list outlined in 7.4a.<br>B. Verify that the farm has a copy of the risk assessment produced on behalf of the egg and fingerling suppliers and that this assessment covers the species listed in 7.4a.<br>C. Verify that the farm has a copy of the egg and fry supplier(s) response plan and protocols.   | 1 |  |  |   | Farm is informed, same company<br>Risk assessment from fingerling supplier verified<br>Risk assessment from fingerling supplier verified |
| 7.5      | <b>Indicator:</b> Evidence that the egg and fingerling producer must have an equivalent or better health status than that of the grow-out facility, and must follow all national and local (jurisdictional) guidance on disease management<br><b>Requirement:</b> Yes   | a. Obtain a written statement from egg and fingerling producers detailing the applicable national and local disease regulations and guidance on disease management which the supplier follows.<br>b. Prepare a letter informing egg and fingerling producers that they must evaluate eggs and fry using health status metrics developed by the farm's veterinary health professional (see 4.1.2a).<br>c. Maintains records of the farm's evaluations of the condition of eggs and fingerlings upon delivery.   | A. Verify that the farm has a written statement from the egg and fingerling producer detailing how the supplier conforms to applicable national and local regulations and guidance on disease management.<br>B. Verify that the farm has a copy of the letter informing its suppliers of health status metrics developed by the farm's veterinary health professional.<br>C. Verify that the farm keeps records of evaluating the condition of eggs and fingerlings for each delivery. | 1 |  |  |   | Health status is described in health plan<br>Health status is described in health plan<br>Every delivery is controlled and signed        |
| 7.6      | <b>Indicator:</b> Evidence of disclosure to the grow-out farm of all chemical and antibiotic treatments on eggs and fry, including the reason for their use and the quantity used   | a. Prepare a letter informing egg and fry suppliers that they must disclose all chemical and antibiotic treatments on eggs and fry, along with stated rationale and the quantity used.<br>b. Optional: Farm may conduct voluntary set tests on a subsample of eggs and fry for each stocking event, to test for chemical and antibiotic use consistent with the supplier's declaration.  | A. Verify that the farm has informed its suppliers that they must disclose information on chemical and antibiotic treatments together with the rationale for their use.<br>B. Auditor includes in the audit report whether the farm has chosen to conduct chemical and antibiotic test on a subset of samples for each major stocking event.   | 1 |  |  |   | Farm is informed<br>There is no plan for chemical and antibiotic tests   |
| 7.7      | <b>Indicator:</b> Allowance for the use of therapeutic treatments, including antibiotics or other treatments, that are banned under European Union (EU) law   | a. Inform egg and fry suppliers in writing that the farm will not purchase from suppliers using any therapeutants or antibiotics that are banned under EU law.<br>b. Compare any results from 7.6b to the farm's EU banned list (see 4.2.2a) to show that the egg and fry suppliers do not use banned chemicals.   | A. Verify that the farm has a record of the statement sent to egg and fry suppliers.<br>B. Include a statement in the audit report describing a) whether the farm undertook optional testing of their supplier's fry/fingerlings and b) findings against the EU banned list, if any  | 1 |  |  |   | No use of banned therapeutics or antibiotics<br>No use of banned therapeutics or antibiotics   |
| 7.8      | <b>Indicator:</b> Presence of a fish health management plan implemented in agreement with the facility's designated veterinarian<br><b>Requirement:</b> Yes   | a. For every supplier of fry and egg to the farm, obtain a copy of the supplier's Fish Health Management Plan (FHMP).<br>b. Ensure that the egg and fry supplier's FHMP is reviewed and updated at least annually with signatures by management indicating approval.<br>c. Ensure that the egg and fry supplier's designated veterinarian reviews and approves the FHMP annually and after each update of the FHMP, by signature.  | A. Verify that the farm obtains a FHMP from each supplier of egg and fry.<br>B. Verify that the farm has record that supplier management approves review and update of the FHMP at least annually.<br>C. Confirm that the farm has supplier documentation showing signature and date of review by designated veterinarian.   | 1 |  |  |   | Copy of Fish health plan at farm<br>Copy of Fish health plan at farm<br>Copy of Fish health plan at farm                                 |
| 7.9      | <b>Indicator:</b> Evidence of company-level policies and procedures that demonstrate the company's commitment to each of the 8 key ILO labor issues described in Principle 6  | b. For suppliers identified in 7.9a, obtain a copy of the supplier's company-level policies and procedures relating to key ILO labor issues.   | B. Verify that farm obtains copies of relevant company-level policies and procedures from suppliers.<br>C. Review supplier policies and procedures (copy provided by the farm) to verify the supplier's commitment to address each of the 8 key ILO labor issues.  | 1 |  |  |   | All document at farm<br>The supplier is under certification for ASC Freshwater Trout standard  |
| 7.10     | <b>Indicator:</b> Evidence of regular communication, engagement and consultation with surrounding communities   | Note: see compliance criteria for Indicator 6.9.2.<br>a. Ensure that the farm obtains documentary evidence from egg and fry suppliers of regular communications with surrounding community as described under 6.9.2a, 6.9.2b, 6.9.2c and 6.9.2d  | A. Examine copies of records and documentary evidence (e.g. meeting agenda, minutes, report) to verify that the farm's suppliers performed community consultations in compliance with requirements.  | 1 |  |  |   | The supplier is under certification for ASC Freshwater Trout standard  |