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Acuagranjas dos Lagos SA de CV  
Peñitas Farm  
Camino Vecinal al dique S/N, Diqueno  
C.P. 29550 Ostuacan, Chiapas  
Mexico

## Final Audit Report\*

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CAB: Institute for Marketecology (IMO)  
Author: M.Stark  
Date: 03.10.13

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

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## Glossary

ASI	Accreditation Services International
CC	Certification Committee IMO
d	day(s)
IMO	Institute for Marketecology
TOS	Tori Spence
Lead	Lead Auditor
MIS	Michèle Stark
UOC	Unit of certification
CO	Carlos Orozco

## 1. Executive Summary

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

Peñitas farm site was audited against principle one to seven in one day. The audit was carried out by two auditors in English and partly in Spanish with translation.

During the environmental assessment, 0 major, 6 minor (2 closed prior to publication of this report) and 4 recommendations were raised. During the social assessment, 0 major, 1 minor (0 closed prior to publication of this report) and 0 recommendations were raised.

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

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

## 2. CAB contact information

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

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

Email: [aqua@imo.ch](mailto:aqua@imo.ch)

Website: [www.imo.ch](http://www.imo.ch)

## 3. Background on the applicant farm

No other farm certificates are held.

## 4. Scope

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

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

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

Receiving water bodies delineations: Lake Peñitas

## 5. Audit plan

action	locations	persons	dates*
Desk review: pre-audit data	IMO Head office	MIS	27.05.13
Audit (principle 1-6)	Peñitas Farm	MIS (lead)	15-16.07.13
Audit (principle 7)	Peñitas Farm	CO	16.07.13
Stakeholder & community meetings/interviews	Ostuacan community	CO	16.07.13
Writing of the report	IMO Head office	MIS	08.08.13
Reviewing the report	IMO Head office	TOS	30.08.13
Client report to client	IMO Head office	TOS	30.08.13
Updating report	IMO Head office	TOS	09.09.13
Draft public report to ASC	IMO Head office	TOS	09.09.13
Stakeholder comments			10 days
Updating report	IMO Head office	TOS	03.10.13
Certification decision	IMO Head office	TOS CC	03.10.13
Final public report to ASC	IMO Head office	TOS	22.10.13

\* The previous versions of the report are not public.

The audit was carried out with Gerardo Martinez, farm manager. Other staff/workers joined parts of the audit, depending on their responsibility and the criteria being assessed.

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

Name	Affiliation
Nicolás Arce	Bienes Comunales Ostuacán
Patricio Rincón	Bienes Comunales Ostuacán
Miguel Arce	Bienes Comunales Ostuacán
José Hernández	Comisariado Plan de Ayala
Rubén Hernández	Comisariado Plan de Ayala
Avercio Hernández	Presidente de Ostuacán
Miguel Ramírez	Concejal Distrito Pichucal

First audit for ASC certification

## 6. Findings

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

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

All water measurements and analysis were found to be sufficiently compliant.

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

“Acuagranjas Dos Lagos S.A. de C.V.” was established on August 2006, but this is only the commercial name and all employees are hired through “Servicios Agroindustriales Amacohite S.A. de C.V.”, which was established on November 2012, once production was finished.

In General, employees are very satisfied with working conditions, regarding treatment received by their supervisors, timeliness with payments and facilities offered by the company, especially at the canteen and bathrooms; workers receive work clothes and PPE according to their job positions, with no charge, but it was found that compressed air tanks on diver's room are not properly tied. Also in the diver's room an electrical panel was observed with several breaker covers missing, there is no an emergency shower nor eye wash station close to the places where chemicals and flammable materials are being stored, there is no secondary containment mechanism on chemical's warehouse and emergency lights are missing on fish's food warehouse.

It's necessary to remark that hygiene and safety manager is in charge of such department since February 2013 and a couple of those issues found, were already uncovered by her and she already asked for secondary containment mechanism and emergency shower with eye wash station, in order to install it on chemical's warehouse (requisition was observed to be sent on June 26<sup>th</sup> 2013). Despite that, it was verified that the company is deeply committed to comply with Mexican Labor Laws and ASC Standard and management agreed to fully correct those situations found during the next months.

Community interviews further confirmed the audit findings and interviewed persons emphasized their support for this project.

For details of stakeholder submissions received throughout the certification process, please see Annex 4.

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

## 7. Evaluation results

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

## 8. Decision

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

## 9. Determination of the start of the COC

### Risk assessment - COC within the farm

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

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

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

Ref to CR	Integrity of certified products	Associated risk	rationale
17.5.1	System in use	L	Robust internal traceability system and continuous documentation of lots, fish numbers and quantities produced.
17.5.1.2	The opportunity of substitution prior to or at harvesting	L	Little incentive or opportunity to substitute any live fish from the cages prior to or at harvesting.
17.5.1.3	The possibility of introducing product from outside the unit of certification	L	The entire farm is undergoing assessment to be ASC certified. Therefore, there is no incentive and little possibility to introduce product from outside of the UOC.
17.5.1.4	Robustness of the management system	L	Robust management system
17.5.1.5	Any transshipment activities taking place	L	The farm is situated in a small lake close to the harvest/landing site. No transshipment activities take place.
17.5.1.6	The number and/or location of points of harvest	L	There is only one landing site used for all harvests, where fish are loaded into sealed tanks.
	Overall risk estimation	L	

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

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

The scope of the assessment includes Peñitas farm. COC certification is required from the point of unloading from sealed tanks.

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

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

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

NA

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

## 10. Non-conformity report(s)

Producer: <a href="#">Acuagranjas Dos Lagos SA de CV</a>					
N° of CC	Year	Cat.	Non-conformity (summary)	Action plan	Deadline
genera l	2013	rec	<u>Observation - production estimations:</u> Farm estimations (fish numbers) are not very precise. This makes mass balance calculations and verifications difficult for the auditor. In view of escape control verification and recovery data, such data should improve over time.		Verification during the next audit
2.5.1e	2013	min	<u>Water analysis</u> duplicate samples were taken and analysed by the CB in the company lab. Samples were analysed immediately after sampling but not cooled according to the ASC protocol.	<u>Root Cause:</u> We consider that the time between the samples where taken and the analysed was very short to use ice <u>Corrective Action:</u> Use ice in the cooler to transport the water samples to the analysis <u>Timeframe:</u> Next water sampling	Verification during the next audit
2.5.1g	2013	min	<u>Water analysis</u> Some of the lab analysis results of both the auditor and farm were wrong and the analysis was repeated. The second set of data was in range of the previous 6month data and there was no unexplainable difference between the auditor and farm results. Nevertheless, difference between auditor	<u>Root Cause:</u> a) contamination of the viles used and b) instability of the solutions used as electricity is not stable in the current mobile lab (will be changed) and hence the fridge may be switched off for some time. <u>Corrective Action:</u> a) First we will clean all the material with distilled water and free	Verification during the next audit



**Producer:** Acuagranjas Dos Lagos SA de CV

N° of CC	Year	Cat.	Non-conformity (summary)	Action plan	Deadline
			<p>and farm results for parameters such as turbidity and total-Phosphorus was as expected &gt;5%. According to Acuagranjas, the first analysis results and standards gave false readings due to a) contamination of the viles used and b) instability of the solutions used as electricity is not stable in the current mobile lab (will be changed) and hence the fridge may be switched off for some time.</p> <p>In general Acuagranjas will need to look into the replicability and stability of their analysis methods. They are already involved in a testing ring where samples are re-evaluated by an external accredited lab and results are compared.</p>	<p>phosphate soap. We will buy a Hach water quality kit (already ordered) to double check the samples and compare the results. Every three months we will crosscheck the samples with an external certified lab.</p> <p>b) Buy and install an emergency electric power supply for the farm.</p> <p><u>Timeframe:</u> All three actions will be established before january 2014. The cleaning and the esxternal lab will be done inmediately The Hach kit will arrive in november The power supply will be at the end of 2013</p>	
2.6.1b	2013	min	<p><u>Maps</u> There is no evidence of wetland conversion, but there is also no map available showing pre- and post 1999 situation.</p>	<p><u>Root Cause:</u> Lack of local information <u>Corrective Action:</u> Research with local and federal institutions for maps or information regarding the status before 1999 (INEGI; INE, Colegio de la Frontera Sur, Universidad Autonoma de Chiapas) <u>Timeframe:</u> Before January 2014</p>	Verification during the next audit
4.1	2013	rec	<p><u>Observation - bred tilapia and wild populations:</u> There is a strong anticipation from local fishermen and local authorities that Acuagranjas restocks the lake with tilapia (directly from the hatchery or with all/regular cages of fish that are too small after the first weeks/grading.</p>		Verification during the next audit

**Producer:** Acuagranjas Dos Lagos SA de CV

N° of CC	Year	Cat.	Non-conformity (summary)	Action plan	Deadline
			However, although permitted and anticipated by local authorities, the impact of stocking the lake with only one species, specifically bred strains of this species, should be looked into from a ecological/biodiversity point of view.		
4.1.3a	2013	min	<p><u>Trapping Devices</u> The system used over the last months did not trap any fish. Hence the system was changed and is now a trap fish can not escape from. This leads to fish dying in the net as well as trapped cormorants. Large tilapia do not seem to go into the trap. For these reasons the system does not seem to be effective or representative to monitor escapes and additionally causes damage to other species. however, it is not clear how such a system could be set up in a better way.</p> <p>Besides, the farm does not really have the right to fish in the lake and it is difficult to communicate to the fishing community, why additional nets have been put into the lake.</p>	<p><u>Root Cause:</u> The entrance to the trap was so big and therefore we have birds and the possibility to have fish escapes. The birds got trapped.</p> <p><u>Corrective Action:</u> Reduce the entrance to the net with swine to avoid the birds. Make another kind of trap</p> <p><u>Timeframe:</u> November 2013</p>	Verification during the next audit
6.3.1	2013	min	<p><u>Observation - mortalities:</u> During the audit a number of left over dead fish in the cage after harvest were observed. In addition, relatively high numbers of mortality during harvest were noted from documentation.</p>		Verification during the next audit
6.4.1	2013	rec	<p><u>Observation - disease prevention:</u> Although all requirements of this standard are complied with regarding this topic and no major disease has been experienced, compared with the experience in aquaculture with other species and in light of the planned increase in production quantities, it seems more precautionary measures for disease prevention may be appropriate.</p>		Verification during the next audit

Producer: <a href="#">Acuagranjas Dos Lagos SA de CV</a>					
N° of CC	Year	Cat.	Non-conformity (summary)	Action plan	Deadline
7.4.1	2013	min	<u>Employee Health and Safety</u> Compressed air tanks are not properly tied on diver's room, there is not an eye wash station closer to chemical's warehouse, an electrical panel on diver's room has several breaker covers missing, chemical's warehouse does not have a secondary containment mechanism and there are no emergency lights on fish food warehouse.	<u>Root Cause:</u> improper maintenance <u>Corrective Action:</u> Compressed air tanks will be properly tied, an eye wash station is already in process to be purchased, as well as secondary containment mechanism for chemicals, electrical panel will be properly covered and we will install emergency lights missing on fish food warehouse. <u>Timeframe:</u> 31.12.2013	Verification during the next audit

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

## 11. Next scheduled audit

Next planned surveillance audit; (year, month):	July 2014
Complete re-certification every three years; at the latest (year):	2016

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

**Operator's comments (optional):**

none

The operator has confirmed their agreement with this report and has committed to implementing the action plan/corrective measures. The final certification decision is made by the responsible certification officer at IMO.

## **Annexes**

### **Annex 1a. Evaluation results P1-6**

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

- Water monitoring data and analysis

### **Annex 1b. Evaluation results P7**

Please see separate document.

## **Annex 2. Classification of minor / major non-conformities**

### **Minor non-conformities**

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

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

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

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

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

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

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

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

### **Major non-conformities**

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

i. Prior to certification being granted.

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

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

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

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

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

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

## Annex 3. Form 1– Request for Interpretation or Variance

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

### I CAB Request

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

### II ASC Determination

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

## Annex 4. Stakeholder submissions

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

Public consultation period	Stakeholder submission	IMO Response
Audit announcement (30 days prior to audit)	N/A	None submitted
Draft public report (10 days from report publication)	N/A	None submitted



criteria		recomen- dation	minor NC	major NC	NC	action plan	deadline	action plan approved by IMO	status
2.5.1	e		1		<u>Water analysis</u> duplicate samples were taken and analysed by the CB in the company lab. Samples were analysed immediately after sampling but not cooled according to the ASC protocol.	<u>Root Cause:</u> We consider that the time between the samples where taken and the analysed was very short to use ice <u>Corrective Action:</u> Use ice in the cooler to transport the water samples to the analysis <u>Timeframe:</u> Next water sampling	verification during next audit	OK	Open
	g		1		<u>Water analysis</u> Some of the lab analysis results of both the auditor and farm were wrong and the analysis was repeated. The second set of data was in range of the previous 6month data and there was no unexplainable difference between the auditor and farm results. Nevertheless, difference between auditor and farm results for parameters such as turbidity and total-Phosphorus was as expected >5%. According to Acuagranjas, the first analysis results and standards gave false readings due to a) contamination of the viles used and b) instability of the solutions used as electricity is not stable in the current mobile lab (will be changed) and hence the fridge may be switched off for some time. In general Acuagranjas will need to look into the replicability and stability of their analysis methods. They are already involved in a testing ring where samples are re-evaluated by an external accredited lab and results are compared.	<u>Root Cause:</u> a) contamination of the viles used and b) instability of the solutions used as electricity is not stable in the current mobile lab (will be changed) and hence the fridge may be switched off for some time. <u>Corrective Action:</u> a) First we will clean all the material with distilled water and free phosphate soap. We will buy a Hach water quality kit (already ordered) to double check the samples and compare the results. Every three months we will crosscheck the samples with an external certified lab. b) Buy and install an emergency electric power supply for the farm. <u>Timeframe:</u> All three actions will be established before January 2014. The cleaning and the external lab will be done immediately The Hach kit will arrive in november The power supply will be at the end of 2013	verification during next audit	OK	Open
2.6.1	b		1		<u>Maps</u> There is no evidence of wetland conversion, but there is also no map available showing pre- and post 1999 situation.	<u>Root Cause:</u> Lack of local information <u>Corrective Action:</u> Research with local and federal institutions for maps or information regarding the status before 1999 (INEGI; INE, Colegio de la Frontera Sur, Universidad Autonoma de Chiapas) <u>Timeframe:</u> Before January 2014	verification during next audit	OK	Open
4.1.3	a		1		<u>Trapping Devices</u> The system used over the last months did not trap any fish. Hence the system was changed and is now a trap fish can not escape from. This leads to fish dying in the net as well as trapped cormorants. Large tilapia do not seem to go into the trap. For these reasons the system does not seem to be effective or representative to monitor escapes and additionally causes damage to other species. however, it is not clear how such a system could be set up in a better way. Besides, the farm does not really have the right to fish in the lake and it is difficult to communicate to the fishing community, why additional nets have been put into the lake.	<u>Root Cause:</u> The entrance to the trap was so big and therefore we have birds and the possibility too have fis scapes. The birds got trapped <u>Corrective Action:</u> Reduce the entrance to the net with swine to avoid the birds. Make another kind of trap <u>Timeframe:</u> November 2013	verification during next audit	OK	Open
4.4.2	a		1		<u>Threatened Species</u> A list of threatened species was available, however, during the audit a new list according to the guidance was prepared. Farm related threats have not yet been assessed, although they may be minimal as all listed species are dragon flies.	<u>Root Cause:</u> There is no precise information of the dragonflies' distribution. <u>Corrective Action:</u> Attached we send the information of Odonata Class found in the state of Chiapas, no one near to the project location. <u>Timeframe:</u> September 7 2013	verification during next audit	OK	done
	b		1		<u>Identification of farm-related threats</u> Farm related threats and hence appropriate precautionary measures have not yet been defined.	<u>Root Cause:</u> The procedure was not clear enough in the veterinary plan <u>Corrective Action:</u> Correct the script according to the national an international standars (Senasica, Mexico's sanitary regulations and the OIE). Look at attached file. <u>Timeframe:</u> September 7 2013	verification during next audit	OK	done
6.3.1			1		<u>Observation - mortalities</u> During the audit a number of left over dead fish in the cage after harvest were observed. In addition, relatively high numbers of mortality during harvest were noted from documentation.		na	na	na
general			1		<u>Observation - production estimations</u> Farm estimations (fish numbers) are not very precise. This makes mass balance calculations and verifications difficult for the auditor. In view of escape control verification and recovery data, such data should improve over time.		na	na	na
4.1			1		<u>Observation - bred tilapia and wild populations</u> There is a strong anticipation from local fishermen and local authorities that Acuagranjas restocks the lake with tilapia (directly from the hatchery or with all/regular cages of fish that are too small after the first weeks/grading. However, although permitted and anticipated by local authorities, the impact of stocking the lake with only one species, specifically bred strains of this species, should be looked into from a ecological/biodiversity point of view.		na	na	na
6.4.1			1		<u>Observation - disease prevention</u> Although all requirements of this standard are complied with regarding this topic and no major disease has been experienced, compared with the experience in aquaculture with other species and in light of the planned increase in production quantities, it seems more precautionary measures for disease prevention may be appropriate.		na	na	na
Total			1	6	0	examples: see report (for minors) corrective measure implemented (for majors)	see report	ok na	open done

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

PRINCIPLE 1. OBEY THE LAW AND COMPLY WITH ALL NATIONAL AND LOCAL REGULATIONS

Evaluation results

1.1 Criteria: Evidence of legal compliance

		Compliance Criteria (Required Client Actions):	Auditor Evaluation (Required CB Actions):	Description	ok	minor	major
1.1.1	<p><b>Indicator:</b> Presence of documents proving compliance with local and national authorities on land and water use (e.g., permits, evidence of lease, concessions and rights to land and/or water use)</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	a. Maintain copies of applicable land and water use laws.	A. Review compliance with applicable land and water use laws.	Concession, business licence and extended concession available and valid.	1		
				Concession, business licence and extended concession available and valid.			
		b. Maintain original lease agreements or land titles on file.	B. Confirm client holds original lease agreements or land titles.		1		
		c. Keep records of inspections for compliance with national and local laws and regulations (only if such inspections are legally required in the country of operation).	C. Review inspection records for compliance with national and local laws and regulations (as applicable).	There are no inspection records. There are no inspections by relevant authorities.	1		
		d. Obtain permits and maps showing that farm does not conflict with national preservation areas.	D. Verify facility does not conflict with national preservation areas.	There are no national preservation areas close by. This was verified with the farm manager and viewing preservation maps on the web.	1		
1.1.2	<p><b>Indicator:</b> Presence of documents proving compliance with all tax laws</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	a. Keep records of tax payments.	A. Verify client has records of tax payments to appropriate jurisdiction(s).	records of online tax payments (income tax and social benefit tax) are available for each months.	1		
		b. Maintain copies of tax laws for jurisdiction(s) where company operates.	B. Confirm client has a basic knowledge of tax requirements for farm.	Taxing system was well explained to auditor.	1		
		c. Register with national or local authorities as an "aquaculture activity".	C. Verify client is registered with local or national authorities.	Acuagranja has a business licence specifically to farm tilapia.	1		
1.1.3	<p><b>Indicator:</b> Presence of documents proving compliance with all labor laws and regulations</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	a. Maintain copies of national labor codes and laws applicable to farm.	A. Confirm client has specified documentation.	During records reviewed, it was found that the company is in compliance with all permits and licenses required by government, as well as with Mexican Labor Laws and regulations.	1		
		b. Keep records of farm inspections for compliance with national labor laws and codes (only if such inspections are legally required in the country of operation).	B. Review inspection records for compliance with national labor laws and codes (as applicable).	Durante la revisión de los registros, se encontró que la empresa está cumpliendo con todos los permisos y licencias requeridos por el gobierno, así como también con las Leyes Laborales y reglamentos de México.	1		
1.1.4	<p><b>Indicator:</b> Presence of documents proving compliance with regulations or permits concerning water quality impacts</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	a. Obtain permits for water quality impacts where applicable.	A. Verify that client obtains permits as applicable.	Concession, business licence and extended concession available and valid.	1		
		b. Comply with all discharge laws or regulations.	B. Review evidence of compliance with discharge laws or regulations.	The environmental impact assessment as well as monthly water analysis comply with the water quality parameters required by law (only for P and N).	1		
		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.	see 1.1.4b	1		

PRINCIPLE 2: MANAGE THE FARM SITE TO CONSERVE NATURAL HABITAT AND LOCAL BIODIVERSITY					
2.1 Criteria: Site information		Compliance Criteria (Required Client Actions):	Auditor Evaluation (Required CB Actions):		
	Indicator: Site location, history and stewardship activities matrix located in	a. Complete the Receiving Water Information Checklist in Audit Reference 2 (Table 1 in Appendix 1 of the Standard).	A. Do not schedule on-site audit of client until checklist review is complete.	All data was submitted prior to the audit as required.  Data submitted was complete, accurate and current, although this is difficult to judge from a pure desktop audit.	1
		b. Submit checklist and attachments to CB before the on-site audit.	B. Review client submission for completeness, accuracy, and currency of information. Request clarification if needed.		1

2.1.1	<p>Appendix 1, Table 1 is completed and validated</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>		<p>C. Verify client information by cross-checking with independent sources (e.g. local authorities).</p>	<p>Through interviews with local people, as well as with representatives of cooperatives of fish farms that shares the dam with "Acuagranjas Dos Lagos S.A. de C.V.", they mentioned that specimens of the specie known as "red tilapia", are occasionally found in the dam and they also mentioned that individuals of "black tilapia" are also found in the area, because the company contributes with local fishermen communities, occasionally releasing fingerlings in the dam.</p> <p>A través de las entrevistas con pescadores locales, así como con los representantes de cooperativas de granjas de peces que comparten la represa con "Acuagranjas Dos Lagos S.A. de C.V.", ellos mencionaron que especímenes de la especie conocida como "tilapia roja" son encontrados eventualmente en la represa y ellos también mencionaron que individuos de "tilapia negra" son encontrados en el área, porque la empresa contribuye con las comunidades locales de pescadores, liberando alevinos en la represa, ocasionalmente.</p>	1			
<b>2.2 Criteria: Presence of natural or established tilapia species</b>		<b>Compliance Criteria (Required Client Actions):</b>		<b>Auditor Evaluation (Required CB Actions):</b>				
2.2.1	<p><b>Indicator:</b> Demonstration that the tilapia species cultured is established<sup>[1]</sup> and naturally reproducing in the receiving waters<sup>[2]</sup>, of the operation on or before 1 January 2008<sup>[3]</sup></p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All farm locations outside Africa (see 2.2.2), Farm-Wide</p>	<p>a. Collect documentary evidence that cultured species was established in receiving waters on or before 1 January 2008, or</p> <p>Collect first hand accounts showing evidence for natural reproduction of tilapia species in receiving waters on or before 1 January 2008. Submit evidence with checklist (Audit Reference 2).</p> <p>b. If system does not have receiving waters according as defined in this requirement<sup>[2]</sup> then the requirements of Indicator 2.2.1 are not applicable.</p> <p>c. If water is discharged into municipal water systems, show that there is a mechanism for treating effluent to eradicate/eliminate macro-biological organisms such as fish.</p>	<p>A. Review evidence for compliance with the Requirement. Acceptable documentary evidence: peer-reviewed literature; verifiable Environmental Impact Assessment; and government certification.</p> <p>Acceptable first hand accounts: community testimonials and direct evidence for multiple size classes of tilapia species in receiving waters captured with cast nets, trapping devices or fishing.</p> <p>B. Auditor response to 2.2.1A is "not applicable" (NA).</p> <p>C. Review evidence to confirm compliance.</p>	<p>Tilapia was introduced by the government in the 70's. Catch data back to 1992 highlight that the tilapia has become established and is further confirmed by a letter from the responsible authority. Amongst the tilapia species caught, <i>Oreochromis niloticus</i> is specifically mentioned.</p> <p>NA</p> <p>NA</p>	1	1	1	
Footnote	<p><sup>[1]</sup> "A non-indigenous species is considered established if it has a reproducing population within the basin, as inferred from multiple discoveries of adult and juvenile life stages over at least two consecutive years. Given that successful establishment may require multiple introductions, species are excluded if their records of discoveries are based on only one or a few non-reproducing individuals whose occurrence may reflect merely transient species or unsuccessful invasions." (National Oceanic and Atmospheric Administration)</p>							
Footnote	<p><sup>[2]</sup> "Receiving water" is defined as all distinct bodies of water that receive runoff or waste discharges, such as streams, rivers, ponds, lakes and estuaries (adapted from World Health Organization). This does not include farm-constructed water courses, impoundments or treatment facilities.</p>							
Footnote	<p><sup>[3]</sup> Where there are no-discharge systems, or no discharge to receiving waters, requirements 2.2.1 and 2.2.2 are not applicable.</p>							
2.2.2	<p><b>Indicator:</b> In Africa, demonstration that the tilapia species and strain cultured is established and naturally reproducing in the receiving waters of the operation or before 1 January 2008</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> Farms located in Africa only (see 2.2.1), Farm-Wide</p>	<p>a. Collect documentary evidence that cultured species and strain was present in receiving waters on or before 1 January 2008 or</p> <p>Collect first hand accounts showing evidence for natural reproduction of tilapia species and strain in receiving waters on or before 1 January 2008. Submit evidence with checklist (Audit Reference 2).</p> <p>b. If system does not have receiving waters as defined in this Requirement<sup>[2]</sup> then the requirements of Indicator 2.2.2 are not applicable.</p> <p>c. If water is discharged into municipal water systems, show that there is a mechanism for treating effluent to eradicate/eliminate macro-biological organisms such as fish.</p>	<p>A. Review evidence for compliance with the Requirement. Acceptable documentary evidence: peer-reviewed literature; verifiable Environmental Impact Assessment; and government certification.</p> <p>Acceptable first hand accounts: community testimonials and direct evidence for multiple size classes of tilapia species in receiving waters captured with cast nets, trapping devices or fishing.</p> <p>B. Auditor response to 2.2.2A is "not applicable" (NA).</p> <p>C. Review evidence to confirm compliance.</p>	<p>NA</p> <p>NA</p> <p>NA</p>	1	1	1	

2.3 Criteria: The effects of eutrophication		Compliance Criteria (Required Client Actions):	Auditor Evaluation (Required CB Actions):				
2.3.1	<p><b>Indicator:</b> The percent change in diurnal dissolved oxygen of receiving waters relative to dissolved oxygen at saturation for the water's specific salinity and temperature</p> <p><b>Requirement:</b> ≤ 65%</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	<p><b>Instruction to Clients for Indicator 2.3.1 - Diurnal Difference in Dissolved Oxygen (DDDO)</b></p> <ul style="list-style-type: none"> <li>- Sampling for DDDO is done at least once per month and is measured only at Receiving Water Farm Afar (RWFA) site.</li> <li>- Measure dissolved oxygen (DO), conductivity (or salinity), and temperature at 0.3 m depth. Take all three measurements at the same time.</li> <li>- For each monthly sampling of DDDO, take measurements two times: 1 hour before sunrise and 2 hours before sunset.</li> <li>- Equations for calculating DDDO are given in Audit Reference 6 (also Equation 1 in Appendix III of the Standard).</li> </ul> <p>Note 1: For farms located in temperate zones, audits will occur during the 4-month window of peak primary productivity in receiving waters.</p> <p>Note 2: For farms where thermal destratification occurs (a natural event when oxygen is depleted due to mixing of deep waters with surface waters), the detection of low oxygen concentration will be recorded but will not be considered a non-conformance.</p> <p>Note 3: The pre-sunset measurements are taken at the same time that samples are collected for water quality monitoring (see Instructions for 2.5.1) at the day of the audit.</p>					
		a. Collect ≥ 12 months of DDDO samples if farm was built after December 2009 (farms built before December 2009 need only 6 months of data).	A. Do not schedule on-site audit until client provides baseline DDDO data.	DDDO was provided prior to the audit.	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.	equipment was calibrated prior to taking measurements, as required for the individual equipment.	1		
		c. Adjust DO at saturation to reflect temperature, salinity and altitude during calibration or in calculations (see Audit Reference 6).	C. Verify that client adjusts for temperature, salinity and altitude through calibration or in calculations (Audit Reference 6).	Equipment adjusts for temperature, salinity and altitude automatically.	1		
		d. Calculate DDDO using equation 1 (Audit Reference 6) and oxygen saturation values (Audit Reference 5). Enter DDDO values into Water Quality Monitoring Matrix (Audit Reference 4).	D. Review Water Quality Monitoring Matrix. Verify that all DDDO measurements from the receiving water comply with the Requirement.	data available and calculated according to the requirements.	1		
		e. Calculate average annual DDDO for the prior 12-month period. Enter result into Water Quality Monitoring Matrix (Audit Reference 4).	E. Review monitoring matrix and confirm that mean annual DDDO ≤ 65 %.	Annual DDDO values are < 65% .	1		
	f. Arrange to take DO measurements while the auditor is at the farm.	F. Witness client measuring DO. On-site values should fall within range of farm data for DDDO. If an out of range measurement is observed, raise a non-conformity.	DO measuring was witnessed and were carried out according to requirements. Results are within range.	1			
2.4 Criteria: Water quality in oligotrophic receiving waters		Compliance Criteria (Required Client Actions):	Auditor Evaluation (Required CB Actions):				
2.4.1	<p><b>Indicator:</b> Secchi disk visibility<sup>(4)</sup> limit above which production is not certifiable</p> <p><b>Requirement:</b> 10 meters</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	<p><b>Instruction to Clients for Indicator 2.4.1 - Upper Limit of Secchi Disk Visibility (SD)</b></p> <p>The TAD concluded that "Water bodies with an average annual Secchi disk visibility at or above 10 meters are not permitted to be used as receiving waters under the ISRTA because of their ecological uniqueness and rarity." Thus, Indicator 2.4.2 sets an upper limit on eligibility for certification: SD ≤ 10 m.</p> <ul style="list-style-type: none"> <li>- Testing of the upper limit of SD is done only at the RWFA sampling station.</li> <li>- When depth at RWFA station is &lt; 10 meters, the Requirement does not apply.</li> <li>- The required methods and equipment for measuring SD are given in Audit Reference 1.</li> </ul>					
		a. Collect ≥ 12 months of SD readings at RWFA station (for first audits, farm must have ≥ 6 months of data). Enter SD values into Water Quality Monitoring Matrix (Audit Reference 4).	A. Review matrix to verify that average annual SD < 10 m. If average annual SD equals or exceeds 10 m, production is not certifiable.	Average as well as each individual secchi value is well below 10m.	1		
	b. Arrange to take SD measurements at RWFA during the audit of the farm. The auditor will witness and replicate your SD measurements.	B. Witness client measuring SD. Repeat the SD measurement yourself at the same time and location. Record both sets of values.	secchi measuring was witnessed during the audit and repeated by auditor. Recordings were identical or at the maximum 1 value apart.	1			

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

2.4.4	<b>Indicator:</b> Chlorophyll <i>a</i> concentration limit in receiving waters <sup>(4)</sup> <b>Requirement:</b> ≤ 4.0 µg/L <b>Applicability:</b> All Farms, Farm-Wide	a. If required under Indicator 2.4.2, collect water samples at RWFA. Determine chlorophyll <i>a</i> concentration.	A. Take duplicate water sample at RWFA. Have sample analyzed by a qualified independent laboratory for chlorophyll <i>a</i> concentration (for handling, see Indicator 2.5.1)	NA, all secchi disk readings are <5m.	1
		b. Report results to CB.	B. Calculate percent error of farm data using Equation 2 (Audit Reference 6). If > 5% difference is observed between auditor data and farm min/max, raise a non-conformity (see Audit Reference 3).	NA, all secchi disk readings are <5m.	1
		c. Analyze chlorophyll <i>a</i> concentrations in all subsequent water samples from monthly water quality monitoring. Continue until instructed otherwise by the CB.	C. Verify that samples from receiving waters comply the Requirement.	NA, all secchi disk readings are <5m.	1
<b>2.5 Criteria: Receiving water monitoring</b>		<b>Compliance Criteria (Required Client Actions):</b>	<b>Auditor Evaluation (Required CB Actions):</b>		
2.5.1	<b>Indicator:</b> Receiving water quality monitoring matrix completed and validated (Appendix II) <b>Requirement:</b> Yes (6 months data, pre-audit, required) <b>Applicability:</b> All Farms, Farm-Wide	<b>Instruction to Clients for Indicator 2.5.1 - Water Quality Monitoring</b> - Required parameters for the water quality monitoring program are shown in Appendix II of the Standard. - Samples are collected from each of the 3 sampling stations: RWRP; RWFO; and RWFA. - A minimum of one sample is taken per station but the TAD encourages multiple sampling to investigate waterbody dynamics. - Water samples are taken from a 1-meter column of water or deeper. - Water samples are taken 2 hours before sunset. - Water samples must be kept in sealed coolers and kept at a temperature of less than 10°C. Note 1: Laboratories used by the auditor for analyses not performed on site with auditor equipment will use ISO methods as described in Audit Reference 1, and farms are suggested to periodically send water samples to these laboratories to assure farm analyses are within a 5% level of error. Note 2: Water samples from RWFA should be taken at the same time that DO is measured for the calculation of DDDO (see Instructions for Indicator 2.3.1) at the day of the audit.			
		a. Conduct ≥ 6 months of water quality monitoring before first audit.	A. Do not schedule the on-site audit until client has monitoring dataset.	Data was submitted prior to on-site audit.	1
		b. Complete the Water Quality Monitoring Matrix (Audit Reference 4) and submit to CB.	B. Review Matrix to verify that client monitored all required parameters at the required frequency.	All required parameters and more were monitored at the correct or a above the required frequency.	1
		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.	Equipment was calibrated prior to making water measurements.	1
		d. During the audit of the farm, arrange to conduct water quality monitoring. The auditor will witness and replicate water sampling.	D. Witness client conducting water quality monitoring. Repeat on-site measurements at the same time and location. Record both sets of values.	Monitoring was carried out according to the ASC protocol.	1
		e. Collect water samples and prepare them for shipment as applicable.	E. Collect duplicates of water samples for independent analyses performed by either the CB or an independent laboratory (i.e. not by farm staff). At a minimum, the independent analyses shall include determination of: chlorophyll <i>a</i> (µg/L), phosphate-phosphorus (µg/L), ammonia-nitrogen (µg/L), and turbidity (NTU). Keep samples in a sealed cooler at < 10°C.	duplicate samples were taken and analysed by the CB in the company lab. Samples were analysed immediately after sampling but not cooled according to the ASC protocol.	1

		f. Perform routine analysis of water samples (i.e. done in the same manner as for previous months of water quality monitoring).	F. Keep samples under auditor control until analyses are complete or until samples are placed into custody of a qualified independent laboratory.	Samples were close to auditor until analysis in lab.	1	
		g. Record values for each parameter and submit results to CB.	G. Calculate percent error of farm data using Equation 2 (Audit Reference 6). If > 5% difference is observed between auditor and farm data, raise a non-conformity (see Audit Reference 3).	Some of the lab analysis results of both the auditor and farm were wrong and the analysis was repeated. The second set of data was in range of the previous 6month data and there was no unexplainable difference between the auditor and farm results. Nevertheless, difference between auditor and farm results for parameters such as turbidity and total-Phosphorus was as expected >5%. According to Acuagranjas, the first analysis results and standards gave false readings due to a) contamination of the viles used and b) instability of the solutions used as electricity is not stable in the current mobile lab (will be changed) and hence the fridge may be switched off for some time. In general Acuagranjas will need to look into the replicability and stability of their analysis methods. They are already involved in a testing ring where samples are re-evaluated by an external accredited lab and results are compared.	1	
<b>2.6 Criteria: Wetland conservation</b>		<b>Compliance Criteria (Required Client Actions):</b>		<b>Auditor Evaluation (Required CB Actions):</b>		
2.6.1	<p><b>Indicator:</b> Hectares of allowable wetland<sup>[5]</sup> conversion since 1999<sup>[6]</sup></p> <p><b>Requirement:</b> 0 ha</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	a. Provide a map delineating all wetlands currently within a 5-km radius of the farm.	A. Evaluate whether there is evidence for any wetland conversion occurring within a 5-km radius of the farm since 1999.	There is no evidence of wetland conversion by the farm. There are no wetlands in the proximity shown on relevant maps on the internet.	1	
		b. Prepare a map showing pre- and post-1999 wetland coverage at farm site.	B. If evidence shows that farm siting or related activities have resulted in loss of wetland habitat since 1999, then the client is not certifiable.	There is no evidence of wetland conversion, but there is also no map available showing pre- and post 1999 situation.	1	
Footnote	<sup>[5]</sup> "Wetland is defined as lands where saturation with water is the dominant factor determining the nature of soil development and the types of plant and animal communities living in the soil and on its surface." (United States Environmental Protection Agency)					
Footnote	<sup>[6]</sup> The year Ramsar contracting parties adopted strategic framework for the development of the Ramsar List					
<b>PRINCIPLE 3. CONSERVE WATER RESOURCES</b>						
<b>3.1 Criteria: Nutrient utilization efficiency</b>		<b>Compliance Criteria (Required Client Actions):</b>		<b>Auditor Evaluation (Required CB Actions):</b>		
3.1.1	<p><b>Indicator:</b> The total amount of phosphorus added to the culture system per metric ton of fish produced per year. Use equations from Appendix III.</p> <p><b>Requirement:</b> ≤ 27 kg</p> <p><b>Applicability:</b> All Farms, Unit of Certification Only</p> <p>Clients may omit/delete pricing details from purchase documents.</p>	a. Calculate total weight of feed used. Keep invoices.	A. Review invoices to confirm the total weight of feed used.	Invoices confirming total weight are available.	1	
		b. Calculate total weight of all fish purchased. Keep invoices.	B. Review invoices to confirm the total weight of fish purchased.	Invoices confirming total weight are available.	1	
		c. Calculate total weight of fish produced. Keep invoices for all fish sold or shipped.	C. Review invoices to confirm the total weight of fish sold or shipped.	Invoices confirming total weight are available.	1	
		d. Obtain a signed letter from feed manufacturer stating phosphorus content of the feed.	D. Confirm that a letter from the feed manufacturer states phosphorus content.	A letter confirming the feed content is available.	1	
		e. Complete nutrient budget worksheet (Audit Reference 8).	E. Review nutrient budget worksheet for accuracy.	Nutrient budget worksheet is available and includes all parameters.	1	
		-	F. Confirm that total phosphorus added does not exceed requirement.	Total phosphorus added does not exceed requirement.	1	



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

3.1.4	<p><b>Indicator:</b> Calculation and verification of the total amount of nitrogen released from the farming activity. Use equations from Appendix III.</p> <p><b>Requirement:</b> Measured in kg nitrogen/mt fish/year</p> <p><b>Applicability:</b> All Farms, Unit of Certification Only</p> <p>Clients may omit/delete pricing details from purchase documents.</p>	a. Calculate total weight of feed used. Keep invoices.	A. Review invoices to confirm the total weight of feed used.	Invoices confirming total weight are available.	1
		b. Calculate total weight of all fish purchased. Keep invoices.	B. Review invoices to confirm the total weight of fish purchased.	Invoices confirming total weight are available.	1
		c. Calculate total weight of fish produced. Keep invoices for all fish sold or shipped.	C. Review invoices to confirm the total weight of fish sold or shipped.	Invoices confirming total weight are available.	1
		d. Use equation from Audit Reference 6 to calculate total amount of nitrogen released.	D. Confirm calculation.	Total nitrogen released is calculated according to the requirements.	1
		e. Complete nutrient budget worksheet (Audit Reference 8)	E. Review nutrient budget worksheet for accuracy.	Nutrient budget worksheet is available and includes all parameters.	1
<b>3.2 Criteria: Groundwater salinization</b>		<b>Compliance Criteria (Required Client Actions):</b>		<b>Auditor Evaluation (Required CB Actions):</b>	
3.2.1	<p><b>Indicator:</b> Percent change in specific conductance of freshwater from a drilled well at the time of drilling and the time of audit. This is required when freshwater wells are used in combination with brackish surface water for the culture of tilapia. Freshwater aquifers are defined as having a specific conductance less than 1,300 µS/cm.</p> <p><b>Requirement:</b> ≤ 10 %</p> <p><b>Applicability:</b> Only farms where brackish water is used for tilapia culture, Farm-Wide</p>	a. Inform CB if brackish water is used for tilapia culture (3.2.1 applies only to farms where surface water is > 1,300 µS/cm or initial well water is < 1,300 µS/cm).	A. Confirm whether client uses brackish water for tilapia culture. If not, then auditor response to 3.2.1B-E is "not applicable" (NA).	NA, brackish water is not used	1
		b. Show well locations on map of farm.	B. Confirm well locations.	NA, brackish water is not used	1
		c. Record date of drilling and initial specific conductance (µS/cm) at each well.	C. Retain a record of location and initial specific conductance for wells.	NA, brackish water is not used	1
		d. Measure specific conductance of all wells less than 4 weeks before audit.	D. Review updated measurements of specific conductance. Compare values to initial measurements taken from the same wells.	NA, brackish water is not used	1
		-	E. Verify that specific conductance at wells did not change by > 10 %.	NA, brackish water is not used	1
<b>PRINCIPLE 4. CONSERVE SPECIES DIVERSITY AND WILD POPULATIONS</b>		<b>Compliance Criteria (Required Client Actions):</b>		<b>Auditor Evaluation (Required CB Actions):</b>	
<b>4.1 Criteria: Escapes from aquaculture facilities</b>		<b>Compliance Criteria (Required Client Actions):</b>		<b>Auditor Evaluation (Required CB Actions):</b>	
4.1.1	<p><b>Indicator:</b> Presence of net mesh or grills/screens, barriers on inlets and outlets of culture vessels (e.g., tanks, ponds and raceways), and mesh on all netted confinement units (e.g., cages and impoundments), appropriately sized to retain the stocked fish</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	a. Install net mesh, screens and barriers in required locales.	A. Inspect site to verify that net mesh, screens and barriers are in place.	besides the cage net, there is also a protection net surrounding the inner net.	1
		b. Use meshes that are appropriately sized to retain stocked fish.	B. Inspect site to verify meshes are appropriately sized to retain stocked fish.	there are different mesh sizes for the different growth stages which are appropriate to the size of the fish.	1
4.1.2	<p><b>Indicator:</b> Presence of net mesh, or grills/screens and permanent barrier inspection register recording dates, findings and actions taken, including mitigation or fish containment structure repairs</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	a. Establish program for regular inspection of permanent barriers.	A. Inspect site to verify effectiveness of inspection program.	a register of inspection recording date, findings and repairs is available. Regular findings and repairs are recorded, indicating the program is effective. At the same time, divers collect mortalities and check for escaped fish between the inner and outer net. If numbers are high, they are recovered back into the net.	1
		b. Record the dates, findings and actions taken in an 'Inspection Register'.	B. Review records.	ok	1
			C. Do not schedule the first audit until client submits 6 months of inspection data.	ok	1
4.1.3	<p><b>Indicator:</b> Presence of trapping devices placed in effluent/drainage canals or in between cages to sample for escapees, and a record of findings and actions taken</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	a. Establish program for monitoring escapes with trapping devices.	A. Inspect farm to verify that trapping devices are used in an effective and representative way for monitoring escapees.	The system used over the last months did not trap any fish. Hence the system was changed and is now a trap fish can not escape from. This leads to fish dying in the net as well as trapped cormorants. Large tilapia do not seem to go into the trap. For these reasons the system does not seem to be effective or representative to monitor escapes and additionally causes damage to other species. however, it is not clear how such a system could be set up in a better way. Besides, the farm does not really have the right to fish fish from the lake and it is difficult to communicate to the fishing community, why additional nets have been put into the lake.	1
		b. Record all traps used, findings and actions taken.	B. Review records.	findings are recorded as required	1
		c. Collect data for 6 months before first audit.	C. Do not schedule the first audit until client submits 6 months of monitoring data.	more than 6 months data is available	1

4.1.4	<p><b>Indicator:</b> In cage culture systems, the minimum distance between the bottom of the cage and the bottom of the receiving waters where the cage is placed</p> <p><b>Requirement:</b> ≥ 3.0 m</p> <p><b>Applicability:</b> Cage systems only, Farm-Wide</p>	-	A. For cage systems, confirm that distance between cage bottom and bottom sediment is ≥ 3 m.	According to own bathymetry measurements, the lake bed is around 18-22m deep, and water level changes are around 4m. The lake is mainly a catch basin to avoid flooding, hence levels are never much lower. The deepest nets are 7m, therefore, at low water, there is still a remaining estimated minimum of 8m to the lake bottom.	1		
4.1.5	<p><b>Indicator:</b> The minimum percentage of males or sterile fish in a culture unit</p> <p><b>Requirement:</b> 95 %</p> <p><b>Applicability:</b> Land-based systems only, Farm-Wide</p>	<i>If the farm is a land-based system, the client shall arrange to have tilapia cultures sampled for percentage of male fish (or sterile fish) as follows:</i>	<i>For land-based systems, the auditor shall confirm that clients follow requirements for determination of percentage of male fish (or sterile fish) in culture.</i>				
		a. Select three (3) culture vessels at random.	A. Verify samples were selected at random.	NA, cage system	1		
		b. Capture 40 fish from each culture vessel for a total of 120 fish.	B. Verify that fish originated from different culture vessels.	NA, cage system	1		
		c. Determine the number of fish in the sample that are male (or sterile).	C. Verify method used to determine sex (or sterility).	NA, cage system	1		
		d. Calculate the percentage of male fish (or sterile fish) in culture.	D. Review results to confirm compliance with the requirement.	NA, cage system	1		
e. Alternate approach when farm has fewer than 3 culture vessels: capture a total of 100 fish and determine the percentage male fish (or sterile fish).	E. As for 4.1.5D.	NA, cage system	1				
<b>4.2 Criteria: Transporting live tilapia</b>		<b>Compliance Criteria (Required Client Actions):</b>		<b>Auditor Evaluation (Required CB Actions):</b>			
4.2.1	<p><b>Indicator:</b> Presence and evidence of use of fish transport containers that have no escape path for fish</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	a. For transport of live fish to the farm (e.g. fry), ensure that containers do not provide escape paths for fish.	A. Inspect site to verify containers do not provide escape paths for live fish transported to the farm.	Alevins are transported by truck, then in a sealed plastic tank to the farm site, where they are added to the cage via a specific plastic pipe. There seems to be no enhanced risk of escapes using this method. Besides the farming activity, Cages are pulled ashore for harvest, therefore, there is no more escape risk during harvest than during normal grow-out.	1		
		b. For transport of live fish away from the farm (e.g. harvested fish), ensure that containers do not provide escape paths for fish.	B. Inspect site to verify containers do not provide escape paths for live fish transported from the farm.		1		
<b>4.3 Criteria: Transgenic fish</b>		<b>Compliance Criteria (Required Client Actions):</b>		<b>Auditor Evaluation (Required CB Actions):</b>			
4.3.1	<p><b>Indicator:</b> Allowance for the culture of transgenic tilapia</p> <p><b>Requirement:</b> No (None allowed)</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	a. Maintain records for the origin of all cultured stocks including the supplier name, address and contact person(s) for stock purchases.	A. Review records to confirm compliance with the requirement	records confirm supplier information	1		
		b. Purchase documents must confirm that culture stock is not transgenic.	B. If the auditor suspects that transgenic fish are in culture, test stock identity by collecting 3 fish and sending to an ISO 17025 certified laboratory for genetic analysis.	There is no suspicion that transgenic fish are cultured.	1		

4.4 Criteria: Predator control		Compliance Criteria (Required Client Actions):	Auditor Evaluation (Required CB Actions):					
4.4.1	<b>Indicator:</b> Use of lethal <sup>[7]</sup> predator control <b>Requirement:</b> No (None allowed) <b>Applicability:</b> All Farms, Farm-Wide	a. Prepare a list of all predator control devices and their locations.	A. Review list.	There are no predator control devices. Bird protection nets are used. There are no other predators other than birds.	1			
		-	B. Inspect sites to verify no use of lethal predator controls.				There is no evidence of lethal predator devices.	1
Footnote <sup>[7]</sup> The use of lethal predator control is prohibited, unless a predator becomes impinged in netting and is required to be euthanized.								
4.4.2	<b>Indicator:</b> Mortality of IUCN red listed species <b>Requirement:</b> 0 (zero) <b>Applicability:</b> All Farms, Farm-Wide	<b>Instruction to Clients for Indicator 4.4.2 - Presence of IUCN Red List Species</b> Determine whether IUCN red list species are present in the region as follows: - go to <a href="http://www.iucnredlist.org/">http://www.iucnredlist.org/</a> - follow to "other search options" - select "Taxonomy" - select "Animalia" - indicate appropriate "Location", "Systems", "Habitat", - click on "run search" and record species listed and whether they are threatened by the farming activity. Note: The IUCN Red List uses nine categories for ranking species according to threat, and search results may include species that are not currently threatened. For the purposes of determining whether a farm complies with indicator 4.4.2, species in the following IUCN categories may be excluded from further analyses: "Not evaluated", "Data Deficient", and "Least Concern".						
		a. Perform analysis. Record all IUCN red list species and farm-related threats.	A. Repeat analysis to verify that client obtained an accurate result.				A list of threatened species was available, however, during the audit a new list according to the guidance was prepared. Farm related threats have not yet been assessed, although they may be minimal as all listed species are dragon	1
		b. If an IUCN Red List species is identified in region of the farm (including receiving and source waters), take appropriate precautions.	B. Verify that client takes appropriate precautions as required.				Farm related threats and hence appropriate precautionary measures have not yet been defined.	1
<b>PRINCIPLE 5. USE RESOURCES RESPONSIBLY</b>								
5.1 Criteria: Use of wild fish for feed (fishmeal and oil)		Compliance Criteria (Required Client Actions):	Auditor Evaluation (Required CB Actions):					
5.1.1	<b>Indicator:</b> Feed Fish Equivalence Ratio (FFER). See Appendix IV for feed calculations. <b>Requirement:</b> ≤ 0.8 <b>Applicability:</b> All Farms, Unit of Certification Only	a. Obtain a signed letter from feed manufacturer stating percentage of fish meal and/or fish oil (Audit Reference 9) in feed used during the past 12 months.	A. Verify that values are stated in a letter from the feed manufacturer.	Values are stated in a signed letter by the 4 different feed suppliers.	1			
		b. For FFER calculations, exclude fish meal and fish oil derived from rendering of seafood by-products (e.g. the 'trimmings' from a human consumption fishery).	B. Verify client excludes rendered seafood byproducts from calculation of FFER.				FFER was calculated for all fishmeal/-oil used in feed although all comes from trimmings. FFER is 0 if trimmings are excluded.	1
		c. Calculate FFER using equations in Audit Reference 6 (also Appendix IV of Standard).	C. Verify that FFER calculations were done correctly.				Calculations are correct but not applicable as only trimmings are used.	1
		-	D. Confirm that FFER complies with the Requirement				FFER values comply with the standard.	1

5.1.2	<p><b>Indicator:</b> Allowance for the use of fishmeal and fish oil in tilapia feed containing products from fisheries that are listed on the IUCN's Red List or the species list maintained by the Convention on the International Trade of Endangered Species of Wild Fauna and Flora</p> <p><b>Requirement:</b> None</p> <p><b>Applicability:</b> All Farms, Unit of Certification Only</p>	a. Obtain a signed letter from feed manufacturer identifying the origin (genus, species and region harvested) of fish used in fish meal/oil (Audit Reference 9).	A. Verify that species used in fishmeal are identified in a letter from the feed manufacturer.	<p>Species are identified in the letter.</p> <p>IUCN search was viewed during audit for FM and FO from all non certified feeds. Where FM/FO was MSC certified, an additional analysis for threatened species was not carried out. Preferably such searches should be on file prior to the audit.</p> <p>CITES search was viewed during audit for FM and FO from all non certified feeds. Where FM/FO was MSC certified, an additional analysis for threatened species was not carried out. Preferably such searches should be on file prior to the audit.</p>	1	
		b. Determine if any of the species used in fish feed are on the IUCN's Red List following the instructions given for Indicator 4.4.2.	B. Repeat search of IUCN database to verify that client obtained an accurate result.			1
		c. Determine if any of the species used in fish feed are listed by CITES as follows: - go to <a href="http://www.cites.org/eng/resources/species.html">http://www.cites.org/eng/resources/species.html</a> - select option "Species" and click "find it"	C. Repeat search of CITES database to verify that client obtained an accurate result.			1
5.1.3	<p><b>Indicator:</b> Timeframe for producers to source feed containing fishmeal or fish oil originating from fisheries deemed sustainable by an ISEAL member's accredited certification scheme</p> <p><b>Requirement:</b> 5 years following the date of ISRTA publication</p> <p><b>Applicability:</b> All Farms, Unit of Certification Only</p>	a. Prepare a policy stating the organization's support of efforts to shift feed manufacturers to an ISEAL-accredited certification scheme for fish meal/oil origins.	A. Verify that the client's policy supports sustainable feed sourcing (e.g. programs at <a href="http://www.isealalliance.org/portrait/full%20member">http://www.isealalliance.org/portrait/full%20member</a> ).	<p>Three of the feed suppliers only use fishmeal/-oil from the MSC certified sardine fishery in Mexico. Only for the fourth supplier the Fish Source score applies.</p> <p>Letter of intent is available for all feed supplies; three suppliers already comply with this requirement.</p> <p>Evidence of close communication with feed suppliers is available.</p>	1	
		b. Prepare a letter stating the organization's intent to source feed containing fishmeal or fish oil originating from fisheries deemed sustainable by an ISEAL member's accredited certification scheme by 19 December 2014.	B. Obtain a copy of client's letter of intent.			1
		c. Affirm support of the process through internal and external communications (e.g. correspondence with feed manufacturers).	C. Confirm client's support with documented evidence (letters, communications).			1
5.1.4	<p><b>Indicator:</b> Prior to achievement of 5.1.3, the average FishSource score characterizing the fishery(ies) from which the fishmeal or fish oil is derived. See Appendix V for explanation of FishSource scoring.</p> <p><b>Requirement:</b> ≥ 6.0 with no individual score &lt; 6.0 or an N/A in the stock assessment category</p> <p><b>Applicability:</b> All Farms, Unit of Certification Only</p>	<p><b>Instructions to Clients for Indicator 5.1.4 - FishSource Scores of Feed Species</b></p> <p>For species from which fishmeal or fish oil is derived, determine FishSource scores as follows: - go to <a href="http://www.fishsource.org/">http://www.fishsource.org/</a> - select "Species" drop down tab to the left and enter relevant species - select the top tab that reads "Scores"</p>		<p>Since three of the four suppliers already comply with 5.1.3, 5.1.4 only applies to one feed supplier. Fm/FO only comes from one species which has a score compliant with these requirements.</p> <p>see 5.1.4.a</p> <p>see 5.1.4.a</p> <p>see 5.1.4.a</p> <p>see 5.1.4.a</p> <p>NA, 5.1.4. complied with.</p>	1	
		a. Record FishSource scores for each species from which fishmeal or fish oil is derived.	A. Confirm that client has recorded scores for each species. Repeat FishSource analysis to verify that client obtained an accurate result.			1
		b. Confirm that average score is ≥ 6.0 with no individual score < 6.0.	B. If any scores is < 6.0 then the feed does not comply with the Requirement. If the average score is < 6.0 then the feed does not comply with the Requirement.			1
		c. Confirm that there is no 'N/A' in a stock assessment category.	C. If an 'N/A' appears in the sock assessment category then the feed does not comply with the Requirement.			1
		d. If the species is not on the website it means that a FishSource assessment is not available. Contact FishSource via Sustainable Fisheries Partnerships to identify the species as a priority for assessment.	D. If the species does not have a FishSource score then the fish feed does not comply with the Requirement.			1
e. In lieu of FishSource scores, a farm undergoing a first audit may substitute a signed letter of intent from their feed manufacturer stating commitment to provide feed complying with FishSource scoring requirements. However at the second audit, all farms shall demonstrate that they have used feed that complies with the FishSource scoring requirements for a minimum of 6 months.	E. Verify that client has manufacturer's letter of intent as applicable to first audits. Thereafter, client must demonstrate that all feeds used are in compliance with the Requirement.	1				

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

		a. Collect 12 months of data on recovery before the first audit.	A. Make sure client has collected 12 months of data on recovery before first audit.	Recovery data goes back several years and was submitted prior to the first audit.	1	
		b. If the farm proposes to modify the formula for calculating percent recovery, submit written justification to the CB before the first audit.	B. Review justification for using an alternate calculation if applicable.	The calculation as suggested by ASC is used, therefore this point does not apply.	1	
		c. Calculate percent recovery according to the instructions above.	C. Review calculations and verify that client's production records support the conclusions.	The calculations are carried out according to the requirements and the raw data can be traced to the production diary.	1	
		-	D. Verify that percent recovery complies with Requirement.	Average percent recovery is above the requirement.	1	
<b>6.2 Criteria: Chemicals</b>		<b>Compliance Criteria (Required Client Actions):</b>		<b>Auditor Evaluation (Required CB Actions):</b>		
6.2.1	<p><b>Indicator:</b> Allowance for the use of chemicals and therapeutants for disease and pest control that are banned in the importing or producing country</p> <p><b>Requirement:</b> None</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	a. Prepare a list of all chemicals used on the farm in the previous 12 months. [Note: The TAD considers any substance added by the producer to culture system - aside from water and feed - to be a chemical.]	A. Review list. Cross-check against purchases (6.2.2) and health events (6.2.4).	There has not been any use of antibiotics or other allopathic treatments during the last years. This was verified while revision of registers and also in interviews with farm manager and workers.	1	
		b. Prepare a list of suppliers of all chemicals or therapeutants used.	B. Review supplier list to identify the country of origin for each chemical.	There is no supplier for antibiotics or other allopathic treatments because there is no use of such products until now. For other chemicals (Equipment disinfection, shoe disinfection, hand washing material) full technical descriptions and buying documentation is available .	1	
		c. Prepare a list of all the countries where the product has been exported to in the prior 12-month period.	C. Review list and cross-check against documentary evidence (e.g. sales documents).	Products all go to the local market and the US.	1	
		d. Prepare a list of banned substances for the producing and exporting country and the national authority or regulating body in producing country (contact information required).	D. Review evidence and cross-check against published information.	N/A No chemicals/therapeutants are used for disease/pest control. In addition, there is no regulation on aquaculture inputs in Mexico.	1	
		e. Maintain records of voluntary and/or mandatory chemical residue testing conducted or commissioned by the farm from prior 12-month period.	E. Verify records.	N/A No chemicals/therapeutants are used for disease/pest control.	1	
6.2.2	<p><b>Indicator:</b> Allowance for the prophylactic use of antibiotics, prior to any evidence of a disease problem</p> <p><b>Requirement:</b> None</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	a. Maintain records for all purchases of antibiotics (invoices, prescriptions) .	A. Review purchase records and calculate total amount procured by client. Inspect storage area to verify quantities on site.	N/A, no use of antibiotics	1	
		b. Maintain a log of all health related events. For each event record the duration and the requirements for use of antibiotics or therapeutants (see also 6.2.4).	B. Review log of health events to verify that the quantity of antibiotic applied by the client does not suggest prophylactic use.	N/A, no use of antibiotics	1	
		c. Determine the total amount of antibiotics used in prior 12-month period.	C. Verify total amount of antibiotics used is equal to total amount prescribed.	N/A, no use of antibiotics	1	

6.2.3	<b>Indicator:</b> Minimum hold time required before any water in which fish have been fed with feed containing methyl or ethyl testosterone can be released  <b>Requirement:</b> ≥ 48 hours  <b>Applicability:</b> All Farms, Farm-Wide	<i>This indicator applies only to farms where the hatchery is located at the grow-out site (e.g. the grow-out facility owns and operates the hatchery) and where the hatchery discharges into the receiving waters. During the holding period, there shall be no risk of exposure of humans or livestock to methyl or ethyl testosterone.</i>		N/A, discharging into a different water body than the farms.	1
		a. Hatchery facility must have the capacity to retain any water that contains hormones for sex reversal for a period of ≥ 48 hours .	A. Inspect hatchery to verify effectiveness of the systems to retain any water that contains hormones for sex reversal.		
6.2.4	<b>Indicator:</b> Health records proving all therapeutants were used or are being used as prescribed by a veterinary or accredited fish health professional  <b>Requirement:</b> Yes  <b>Applicability:</b> All Farms, Farm-Wide	a. Keep a record of all therapeutants used for prior 12-month period.	A. Review record of therapeutant usage.	N/A, no use of therapeutants. However, a fish health specialist is on site.	1
		b. Maintain all prescriptions for therapeutants for prior 12-month period.	B. Verify that therapeutants were used only under prescription.	N/A, no use of therapeutants. However, a fish health specialist is on site.	1
		c. If prescriptions are made by health professionals who are not veterinarians, obtain evidence of competency (e.g. accreditation) in the diagnosis of fish disease and drug therapy.	C. If a non-vetrenarian wrote prescriptions, confirm that the individual is qualified as an accredited fish health professional.	N/A, no use of therapeutants. However, a fish health specialist is on site.	1
6.2.5	<b>Indicator:</b> Calculation and verification of the total amount of each antibiotic (active ingredient) used per mt fish produced per year.  <b>Requirement:</b> Measured in kilograms of active ingredient of individual antibiotic/mt of fish produced/year  <b>Applicability:</b> All Farms, Farm-Wide	a. Determine total amount of antibiotic used for prior 12-month period.	A. Verify against record of antibiotic use (see 6.2.2C).	N/A, no use of antibiotics	1
		b. Adjust total weight of antibiotic by the fraction of active ingredient.	B. Verify fraction of active ingredient in antibiotic with manufacturer's data.	N/A, no use of antibiotics	1
		c. Determine total weight of fish produced for prior 12-month period. Calculate kg active ingredient/mt of fish produced/year.	C. Verify that calculations are accurate.	N/A, no use of antibiotics	1
<b>6.3 Criteria: Mortalities</b>		<b>Compliance Criteria (Required Client Actions):</b>		<b>Auditor Evaluation (Required CB Actions):</b>	
6.3.1	<b>Indicator:</b> Presence of records demonstrating that fish mortalities are removed consistently on a minimum daily basis  <b>Requirement:</b> Yes  <b>Applicability:</b> All Farms, Unit of Certification Only	a. Ensure that fish mortalities are removed from cultures on a daily basis.	A. Do site inspection to confirm there are no dead fish in cultures whose advanced state of decomposition would suggest mortality is > 1 day.	Dead fish are removed daily, however, one cage fully harvested did still contain a number of dead fish. However, they were not in an advanced state of decomposition.	1
		b. Maintain records of daily removals of fish mortalities.	B. Verify client's records show daily removals of fish mortality for prior 12-month period.	Records for daily removal of dead fish are available. Dead fish are processed into fishmeal/-oil for pet food.	1
6.3.2	<b>Indicator:</b> Evidence proving acceptable disposal of dead fish, (i.e., landfill receiving receipts, sales receipts, permits or approvals for onsite burial, and assurance if converted to animal meals not destined for the culture of tilapia)  <b>Requirement:</b> Yes  <b>Applicability:</b> All Farms, Farm-Wide	a. Prepare a farm policy that addresses all requirements of the Standard in regards to the acceptable disposal of dead fish.	A. Review policy to verify it addresses all requirements of 6.3.2 of the Standard.	All requirements are addressed in the company own policy.	1
		b. Maintain records of mortality disposals as evidence of compliance.	B. Review disposal records to verify compliance.	Disposal records are available and confirm compliance.	1
		-	C. Do site inspection to confirm that farm policy towards mortality is implemented and mortality records are accurate.	On-site inspection and interviews confirmed the implementation of the company policy and showed accurate records.	1



6.4 Criteria: Fish health management		Compliance Criteria (Required Client Actions):	Auditor Evaluation (Required CB Actions):				
6.4.1	<p><b>Indicator:</b> Presence and evidence of implementation of a fish health plan that is site-specific and contains effective methods for 1) Protecting the farm from introduction of pathogens, 2) Preventing the spread of pathogens within the farm and to the receiving waters and 3) Reducing the potential for development of disease resistance by ensuring responsible therapeutant use</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	a. Prepare a fish health plan that addresses all requirements of the Standard, including: 1) Protecting the farm from introduction of pathogens, 2) Preventing the spread of pathogens within the farm and to the receiving waters, and 3) Reducing the potential for development of disease resistance by ensuring responsible therapeutant use	A. Review fish health plan to verify it addresses all requirements of Indicator 6.4.1 of the Standard and that the plan is site-specific.	The fish health plan addresses all the required topics and is site specific.	1		
		b. Obtain review and written approval of the fish health plan by the farm's veterinarian or health professional.	B. Confirm that the farm's veterinarian or health professional has reviewed and approved the fish health plan.	The health plan is approved and signed.	1		
		-	C. Do site inspection to verify that fish health plan is effectively implemented and understood by farm staff.	the health plan is effectively implemented and all staff are well trained and can explain the contents and required actions as required.	1		
<b>Total</b>					<b>144</b>	<b>6</b>	<b>0</b>



criteria	Recommendation	minor NC	major NC	NC	action plan	deadline	action plan approved by IMO	status
7.4.1		1		<p><u>Employee Health and Safety</u> Compressed air tanks are not properly tied on diver's room, there is not an eye wash station closer to chemical's warehouse, an electrical panel on diver's room has several breaker covers missing, chemical's warehouse does not have a secondary containment mechanism and there are no emergency lights on fish food warehouse.</p>	<p><u>Root Cause:</u> Improper maintenance <u>Corrective Action:</u> Compressed air tanks will be properly tied, an eye wash station is already in process to be purchased, as well as secondary containment mechanism for chemicals, electrical panel will be properly covered and we will install emergency lights missing on fish food warehouse. <u>Timeframe:</u> 31.12.2013</p>		OK	Open
Total	0	1	0			Verification during the next audit		

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

add "1" per criteria in applicable column below

\*\*\*\*\*  
**Social requirements of this Standard shall be audited by an individual who is a lead auditor in conformity with SAAS Procedure 200 section 3.1.**  
**(See ASC Farm Certification and Accreditation Requirements)**  
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**PRINCIPLE 7 - BE SOCIALLY RESPONSIBLE**

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

		Evaluation results			
		Description	ok	minor	major
7.1.1	<b>Indicator:</b> Number of incidences of child <sup>[9]</sup> labor <sup>[9]</sup> <b>Requirement:</b> 0 (zero) <b>Applicability:</b> All Farms, Farm-Wide	a. Minimum age of permanent workers is 15 or older (per national legal minimum age). b. System exists to monitor hours and conditions of young workers and light work by children. c. Young workers (from 15 to less than 18): have no conflicts between work and schooling; do not spend more than 10 hours/day on transportation time, school and work; do not perform hazardous work. d. Equal treatment for children of migrant workers.	According to company's policy, minors of 18 years old are not hired and job applicants need to show national ID (voting card, which is issued by Mexican government to citizens with at least 18 years old). All employee's interviews and workers files reviewed confirms that minors below 18 years old are not employed in the farm.  De acuerdo con la política de la compañía, los menores de 18 años no son contratados y los aspirantes a algún puesto necesitan mostrar su tarjeta de elector (que es expedida por el gobierno Mexicano a los ciudadanos con al menos, 18 años de edad). Todas las entrevistas de los empleados y los expedientes de los trabajadores revisados, confirman que menores de 18 años no son contratados en la finca.	1	

<sup>[9]</sup> A "child" is defined as any person less than 15 years of age. A higher age would apply if the minimum age law stipulates a higher age for work or mandatory schooling. If, however, the local minimum age law is set at 14, in accordance with developing country exceptions under ILO Convention 138, the lower age will apply.

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

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

7.2.1	<b>Indicator:</b> Number of incidences of forced <sup>[10]</sup> , bonded <sup>[11]</sup> or compulsory labor <b>Requirement:</b> 0 (zero) <b>Applicability:</b> All Farms, Farm-Wide	a. Contracts clearly stated and understood by employees, no 'pay to work' schemes through labor contractors or training credit programs. b. Employees free to leave workplace and manage their own time. c. Employer does not withhold employee's original identity papers. d. Employer shall not withhold any part of workers' salaries, benefits, property or documents in order to oblige them to continue working for employer. e. Employees not to be obligated to stay in job to repay debt.	According to records reviewed, labor contracts contains all the information required by Mexican Labor Laws; at the moment of the visit, all employees are hired through "Servicios Agroindustriales Amacoite S.A. de C.V.", which is the legal name of the company because "Acuagranjas Dos Lagos S.A. de C.V." is just the commercial name. It was verified that there are copies available of labor contracts on all employee's files and they have received a copy of such contracts. As per worker's interviews, they are free to leave the facility after the end of work shift and are paid in full for their job; original documents are kept by them and it was verified that only copies of National ID are maintained on personnel files.  De acuerdo con los registros revisados, los contratos de trabajo contienen toda la información requerida por las Leyes Laborales de México; al momento de la visita, todos los empleados están contratados a través de "Servicios Agroindustriales Amacoite S.A. de C.V.", que es el nombre legal de la compañía ya que "Acuagranjas Dos Lagos S.A. de C.V." es sólo el nombre comercial. Se verificó que hay disponibles copias de los contratos de trabajo en todos los archivos de los empleados y que ellos han recibido una copia de dichos contratos. Según las entrevistas de los trabajadores, ellos son libres de salir de la empresa después del final de su turno de trabajo y reciben el pago por su trabajo en su totalidad; los documentos originales son guardados por ellos y fue verificado que únicamente copias del documento de identidad son mantenidas en los archivos de personal.	1	
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<sup>[10]</sup> "Forced (compulsory) labor" is defined as all work or service that is extracted from any person under the menace of any penalty for which a person has not offered him/ herself voluntarily or for which such work or service is demanded as a repayment of debt. "Penalty" can imply monetary sanctions, physical punishment, or the loss of rights and privileges or restriction of movement (e.g., withholding of identity documents).

<sup>[11]</sup> "bonded labor" is defined as when a person is forced by the employer or creditor to work to repay a financial debt to the crediting agency.

7.3 Criteria: Discrimination in the work environment		Compliance Criteria:			
7.3.1	<p><b>Indicator:</b> Number of incidences of discrimination<sup>122</sup></p> <p><b>Requirement:</b> 0 (zero)</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	<p>a. Written anti-discrimination policies in place, stating that the company does not engage/support in discrimination in hiring, remuneration, access to training, promotion, termination or retirement based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, age or any other condition that may give rise to discrimination.</p> <p>b. Worker testimony supports that the company does not interfere with the rights of personnel to observe tenets or practices, or to meet needs related to race, caste, national origin, religion, disability, gender sexual orientation, union membership, political affiliation or any other condition that may give rise to discrimination. Records indicate objective mechanisms for employee reviews and the offering of promotion and training opportunities.</p> <p>c. Company has a policy in place protecting pregnant and lactating mothers.</p> <p>d. Company has a policy in place against HIV discrimination.</p>	<p>"Acuagranjas Dos Lagos S.A. de C.V." has a written anti-discrimination policy in place, which was observed to be posted at the canteen; employee's confirmed during the interviews that such policy is applied and that they have not experienced any kind of differences on treatment, remuneration, hiring, promotion or termination regarding race, religion, political affiliation or sexual orientation during the time they have been hired by the company (this was also confirmed during employee's files review). 100% of employees are Mexican.</p> <p>"Acuagranjas Dos Lagos S.A. de C.V." tiene una política anti-discriminación, la cual se observó que estaba expuesta en el comedor; los empleados confirmaron durante las entrevistas que dicha política es aplicada y que ellos no han experimentado alguna clase de diferencia en cuanto al trato, remuneración, contratación, promoción o despido de acuerdo a la raza, religión, afiliación política u orientación sexual durante el tiempo que han estado contratados por la empresa (esto también se confirmó durante la revisión de los archivos de los empleados). El 100% de los empleados son Mexicanos.</p>		1
Footnote	<p><sup>122</sup> "Discrimination" is defined as any distinction, exclusion, or preferences, which has the effect of nullifying or impairing equality of opportunity or treatment. Not all distinction, exclusion, or preference constitutes discrimination. For instance, a merit- or performance-based pay increase or bonus is not by itself discriminatory. Positive discrimination in favor of people from certain underrepresented groups may be legal in some countries.</p>				
7.3.2	<p><b>Indicator:</b> Evidence of proactive anti-discrimination practice</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	<p>a. Verification of clear and transparent company procedures are outlined to raise, file, and respond to discrimination complaints.</p> <p>b. All managers and supervisors receive training on diversity and non-discrimination. All personnel receive non-discrimination training. Internal or external training acceptable if proven effective.</p> <p>c. Comparison of workforce diversity with demographics of host community updated regularly by management.</p>	<p>The company has clear and transparent procedures to raise and answer to discrimination complaints; there are suggestion boxes on bathrooms and canteen and human resources personnel is in charge of review it twice a month, providing feedback to employees regarding every suggestion or complaint. Employees receive training not only on the use of suggestion boxes but also on non-discriminatory practices as part of the hiring process. It was verified that 100% of the workforce, belongs to the closer communities, especially from Plan de Ayala and Ostuacán.</p> <p>La compañía tiene procedimientos claros y transparentes para levantar quejas de discriminación y responderlas; buzones de sugerencias en los baños y el comedor y el personal de recursos humanos está a cargo de revisarlos quincenalmente, dando retroalimentación a los empleados sobre cada sugerencia o queja. Los empleados reciben entrenamiento no solamente en el uso de los buzones de sugerencias sino también en las prácticas antidiscriminatorias, como parte del proceso de contratación. Se verificó que el 100% de los trabajadores, pertenecen a las comunidades cercanas, especialmente de Plan de Ayala y Ostuacán.</p>		1
7.4 Criteria: Health and safety of workers		Compliance Criteria:			
7.4.1	<p><b>Indicator:</b> Percentage of workers trained in health and safety practices/procedures/policies</p> <p><b>Requirement:</b> 100 %</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	<p>a. Minimization of hazards/risks in the working environment, including documented systemic procedures and policies to prevent workplace hazards and their risks, shall exist and the information shall be available to employees.</p> <p>b. Emergency response procedures shall exist and be known by employees.</p> <p>c. Health and safety training for all employees conducted on a regular basis (once a year and immediately for all new employees), including training on potential hazards and risk minimization.</p> <p>d. Potentially dangerous chemicals are stored properly and as prescribed.</p>	<p>The company has complete documentation on policies and procedures seeking to minimize hazards and risks in the workplace and employees mentioned to be aware of said procedures. There are six well equipped first aid kits, as well as a medical room with a doctor available from 8:00 am to 5:00 pm; in addition, there is an emergency plan (updated on April 2013), a fire, an evacuation and rescue and a first aid brigades (11, 12 and 14 employees belongs to such brigades, respectively) and the workers are regularly trained on health and safety matters, as follows: handling of gases (July 7th 2013), use of back support belts (June 25th 2013), use of forklifts (April 12th 2013), first aid (February 26th 2013), use of fire extinguishers (March 1st 2013), aquatic rescue (May 3rd 2013), use of chemicals and emergency plan (July 7th 2013), poisoning by venomous animals (June 18th 2013) and dental care for divers (July 4th 2013). The company conducts fire safety evacuation drills on a quarterly basis (the last two were done on March 20th 2013 and May 5th 2013) and there is a hygiene and safety committee, with participation of employees and workers representatives (5 for each part) that holds meetings on a quarterly basis (the last one was made on March 7th 2013). It was observed during facility walkthrough, that all flammable products are properly stored and the facilities seem to be clean and well organized, but it was found that compressed air tanks are not properly tied on diver's room, there is not an eye wash station closer to chemical's warehouse, an electrical panel on diver's room has several breaker covers missing, chemical's warehouse does not have a secondary containment mechanism and there are no emergency lights on fish food warehouse.</p> <p>La empresa tiene documentación completa sobre las políticas y procedimientos que buscan minimizar los peligros y riesgos en el sitio de</p>		1

7.4.2	<p><b>Indicator:</b> Percentage of health- and safety-related accidents and violations recorded and mitigated through corrective actions</p> <p><b>Requirement:</b> 100 %</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	<p>a. Documentation is generated with regards to occupational health and safety violations.</p> <p>b. Corrective action plan are implemented in response to accidents that have occurred. This should include: analysis of the root causes, address the root causes, remediate and prevent future accidents of similar nature.</p> <p>c. Workers involved in departments where accidents have occurred can explain what analysis has been done and what steps taken/improvements made.</p>	<p>As per documents reviewed, the company has a hygiene and safety policy and manager of the program is in charge of its compliance; in addition, there is a full time occupational doctor and an assistant that are visited by employees in case of illness; records of accidents were observed (only three minor issues during 2013).</p> <p>De acuerdo con los documentos revisados, la compañía tiene una política de higiene y seguridad y la gerente del programa está a cargo de su cumplimiento; además, hay un médico ocupacional y un asistente de tiempo completo, los cuales son visitados por los empleados en caso de enfermedad; se observaron los registros de accidentes (sólo 3 situaciones menores durante el 2013).</p>	1		
7.4.3	<p><b>Indicator:</b> Employer responsibility and proof of insurance (accident/ injury) for employee costs in a job-related accident or injury when not covered under national law</p> <p><b>Requirement:</b> 100 %</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	<p>a. Documentation maintained by management confirms that all personnel are provided sufficient insurance to cover annual check-ups and costs related to occupational accidents or injuries. Equal insurance coverage must include temporary, migrant or foreign workers.</p>	<p>Through records reviewed and employees interviews, it was confirmed that all personnel are affiliated to social security (last payment related to the month of June 2013, was done on July 15th 2013).</p> <p>A través de los registros revisados y las entrevistas de los empleados, fue confirmado que todo el personal está afiliado al seguro social (el último pago, relativo al mes de Junio de 2013, fue hecho el 15 de Julio de 2013).</p>	1		

7.5 Criteria: Wages, overtime and working hours		Compliance Criteria:	
7.5.1	<p><b>Indicator:</b> The percentage of employees who are paid fair and decent wages</p> <p><b>Requirement:</b> 100 %</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	<p><i>Applicable to employees, workers and contractors</i></p> <p>a. Employers/Managers understand and have policies to ensure the principle of equal pay for equal work.</p> <p>b. Employers ensure wages paid for a standard working week (no more than 48 hours) always meet, at least, legal/industry minimum standards, cover basic needs of personnel and provide some discretionary income.</p> <p>c. Labor conflict resolution policy in place to track conflicts &amp; complaints raised, and responses to conflicts &amp; complaints.</p> <p>d. Ratio of lowest wage rate to basic needs wage always exceeds 100%.</p> <p>e. Proof of employer engagement with workers and their representative organizations, and use of cost of living assessments from credible sources to assess basic needs wages.</p>	<p>The monitor verified that all employees performing the same job, receives the same payment. Ordinary hours of work are in compliance with required by Mexican Labor Laws (48 per week) and despite that the national legal minimum wage is MXN\$61.38 per day, the factory pays at least twice since the hiring wage is MXN\$110.93 per day, after three months of probation time pays at least MXN\$133.71, which is the basic salary for harvesting people (but as an additional benefit, they only have to work 44 hours per week), divers earns MXN\$148.56 and feeders receives MXN\$157.71; as additional benefits, the company pays 100% of transport, work clothes and PPE, 55% of meals and offers an attendance bonus of MXN\$400 per month, a production bonus of MXN\$400 per month, a diving bonus of MXN\$200 per month and 5 additional days of Christmas bonus (legally required is 15 days per year). As per report of National Institute of Statistics and Geography "INEGI", the salary that covers basic needs of a family (4 people) in Mexico for 2013 is around MXN\$3,000 per month. There are conflict resolution policies in place to track and give answers to any kind of employee's complaint.</p> <p>El monitor verificó que todos los empleados que realizan el mismo trabajo, reciben el mismo pago. Las horas ordinarias de trabajo están de acuerdo con lo requerido por las Leyes Laborales de México (48 por semana) y a pesar de que el salario mínimo legal es MXN\$61.38 por día, la empresa paga al menos el doble ya que el salario de contratación es MXN\$110.93 por día, después de tres meses de periodo de prueba paga al menos MXN\$133.71, que es el salario básico para la gente de cosecha (pero como beneficio adicional, ellos sólo tienen que trabajar 44 horas por semana), los buzos ganan MXN\$148.56 y los alimentadores reciben MXN\$157.71; como beneficios adicionales, la empresa paga el 100% del transporte, ropa de trabajo y EPP, el 55% de las</p>
7.5.2	<p><b>Indicator:</b> Incidences of abuse of working hours and/or overtime laws</p> <p><b>Requirement:</b> 0 (zero)</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	<p>a. No deductions in pay for disciplinary actions.</p> <p>b. Wage and benefits are clearly articulated to employees and rendered to employees in a convenient manner; e.g. no need to travel to collect benefits, no promissory notes, coupons or merchandise; payment in cash or check.</p> <p>c. Labor-only contracting<sup>131</sup> or false apprenticeship schemes<sup>141</sup> are not accepted, including: revolving/consecutive labor contracts used to deny benefit accrual.</p> <p>d. Clear, transparent mechanism for wage setting known to employees.</p> <p>e. Employer shall comply with applicable laws and industry standards related to working hours. "Normal workweek" can be defined by law but shall not on a regular basis (constantly of majority of the time) exceed 48 hours. Only if allowed by law, variations (to the 48-hour regular work week) based on seasonality may apply.</p> <p>f. Personnel shall be provided with at least on day off in every seven day period.</p> <p>g. All overtime shall be paid at a premium and should not exceed 12 hours per week.</p> <p>h. Overtime work shall always be voluntary.</p>	<p>It was verified that only legally allowed deductions are applied to employee's wages. The company pays worker's salaries in cash every 15 days (15th and 30th) on a timely manner. It was found on worker's files that long term contracts are in place and they are aware about their wages and its calculation. Through time records and workers testimonies, regular work week is 48 hours (44 hours for employees in charge of harvesting) and workers are entitled to have two days of rest every two weeks; it was verified that employees have not exceeded 3 overtime hours per day and 3 times a week (Mexican Labor Laws requirement), during the last 12 months; all overtime hours worked are paid with legally mandated premium rates (100% and 200%) and employees stated that are performed always on a voluntary basis. Since May 2013, the company implemented an automatic time card system (avoiding the use of manual attendance sheet) and it was verified that all overtime hours have been recorder properly.</p> <p>Se verificó que solamente las deducciones legales son aplicadas a los salarios de los empleados. La empresa paga los salarios de los trabajadores en efectivo cada 15 días (15 y 30) de manera puntual. Se encontraron en los archivos de los trabajadores, contratos a largo plazo y ellos están al tanto de sus salarios y su cálculo. A través de los registros de tiempo y los testimonios de los trabajadores, se encontró que las horas regulares son 48 por semana (44 horas para los empleados a cargo de la cosecha) y los empleados tienen derecho a dos días de descanso por cada dos semanas; se verificó que los empleados no han excedido las 3 horas extras por día y 3 veces por semana (requisito de las Leyes Laborales Mexicanas), durante los últimos doce meses; todas las horas extras trabajadas se pagan con los incrementos mandados por la ley (100% y 200%) y los empleados dijeron que siempre hacen sus horas</p>
Footnote	<sup>131</sup> Labor-only contracting arrangement: The practice of hiring workers without establishing a formal employment relationship for the purpose of avoiding payment of regular wages or the provision of legally required benefits, such as health and safety protections		
Footnote	<sup>141</sup> False Apprenticeship Scheme: The practice of hiring workers under apprenticeship terms without stipulating terms of the apprenticeship or wages under contract. It is a "false" apprenticeship if its purpose is to underpay people, avoid legal obligations, or employ children.		
7.6 Criteria: Freedom of association and right to collective bargaining		Compliance Criteria:	

7.6.1	<p><b>Indicator:</b> Incidences of employees denied freedom to associate, ability to bargain collectively<sup>151</sup> or denied access to representative(s) chosen by workers</p> <p><b>Requirement:</b> 0 (zero)</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	<p>a. Workers have the freedom to form and join any trade union, free of any form of interference from employers or competing organizations set up or backed by the employer. ILO specifically prohibits "acts which are designated to promote the establishment of worker organizations or to support worker organizations under the control or employers or employers' organizations.</p> <p>b. Local trade union, or where none exists a reputable civil-society organization, confirms no outstanding cases against the employer for violations of employees' freedom of association and collective bargaining rights.</p> <p>c. Trade union representatives have access to their members in the workplace at reasonable times on the premises.</p> <p>d. Explicit communications from the employer about their commitment to freedom of association and collective bargaining rights of all.</p> <p>e. If trade unions exist, they are able to access/inform all workers directly (posters, pamphlets, visits).</p>	<p>Although there is no union at the facility, there is a mixed commission, with participation of employees and employer representatives, that were elected democratically and that establishes a communication channel between the workers and management in cases where they have suggestions or complains. In addition, there is a safety commission that holds meetings on a quarterly basis in order to assess physical working conditions. Although there is no a Collective Bargaining Agreement in place, the company has a "Proposal Letter", in which employer and employees, agreed to several benefits (mostly economic) for the workers.</p> <p>Aunque no hay un sindicato en la empresa, hay una comisión mixta, con participación de representantes de los empleados y el patrono, que fueron elegidos democráticamente y que establecen un canal de comunicación entre los trabajadores y la gerencia en los casos en que ellos tienen sugerencias o quejas. Además, hay una comisión de seguridad que tiene reuniones cada tres meses para evaluar las condiciones físicas de trabajo. Aunque no hay un Pacto Colectivo, la empresa tiene una "Carta Propuesta", en la cual, el empleador y los empleados han acordado varios beneficios (la mayoría económicos).</p>	1	
Footnote <sup>151</sup> "Bargain collectively" is defined as a voluntary negotiation between employers and organizations of workers in order to establish the terms and conditions of employment by means of collective (written) agreements.					
<b>7.7 Criteria: Disciplinary Actions</b>		<b>Compliance Criteria:</b>			
7.7.1	<p><b>Indicator:</b> Incidences of abusive disciplinary actions</p> <p><b>Requirement:</b> 0 (zero)</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	<p>a. There is never any use of or support for (e.g. subcontractors using) corporal punishment, mental or physical coercion, or verbal abuse.</p> <p>b. Fines or wage deductions shall not be acceptable as a method for disciplining workers (indicated by policy statements, as well as evidence from worker testimony).</p>	<p>As per worker's interviews and records reviewed, any kind of corporal punishment, mental or physical coercion, or verbal abuse is not allowed; employees stated that are very pleased with treatment received from the supervisors and managers. There is no evidence that fines or wages deductions are being applied as a form of discipline workers.</p> <p>De acuerdo con las entrevistas de los trabajadores y los registros revisados, cualquier clase de castigo corporal, mental o coerción física, no está permitida; los empleados dijeron que están muy complacidos con el trato recibido por los supervisores y gerentes. No hay evidencia de que multas o deducciones a los salarios, sean aplicadas como una forma de disciplinar a los trabajadores.</p>	1	
7.7.2	<p><b>Indicator:</b> Evidence of non-abusive disciplinary policies and procedures</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	<p>a. Procedures exist for situations in which disciplinary action is required, and they establish the use of progressive verbal and written warnings. Aim should always be to improve the worker before letting him/her go (indicated by policy statements as well as evidence from worker testimony).</p>	<p>As per company's policy, a progressive disciplinary system (which includes one verbal warning, one written warning, up to 3 days of suspension and firing) is in place and is communicated to the workers as part of the hiring process, verbally (although the company already has an employee handbook printed, which must be delivered to them during the next weeks). Supervisors are also trained on such disciplinary procedures and it was observed that there is a respectful and friendly relationship between them and the workers.</p> <p>De acuerdo con la política de la compañía, hay un sistema progresivo de disciplina (el cual incluye un llamado de atención verbal, un llamado de atención por escrito, hasta 3 días de suspensión y el despido) y es comunicado a los trabajadores como parte del proceso de contratación, verbalmente (aunque la empresa ya tiene un manual del empleado impreso, el cual debe ser entregado a ellos durante las próximas semanas). Los supervisores también son entrenados en dichos procedimientos disciplinarios y se observó que hay una relación respetuosa y amigable entre ellos y los trabajadores.</p>	1	
<b>7.8 Criteria: Action response plans/policies</b>		<b>Compliance Criteria:</b>			
7.8.1	<p><b>Indicator:</b> Evidence of implementation of a corrective action plan (updated annually) that addresses unintended problems associated with labor relations and internal monitoring of labor activities</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	<p>a. Copy of corrective action plan for prior 12-month period (first audit requires previous 3-month period) and employer testimonial that these plans have been implemented.</p> <p>b. Workers are aware of the action plans and their results.</p>	<p>As per company's policy, employees has the possibility to challenge decisions and to raise complaints directly to Human Resources personnel or to their supervisors; during the interviews, workers has confirmed that there is an open door policy in place, in which they are free to speak directly to their supervisors or Human Resources personnel, in cases of situations related to work or even, personal problems.</p> <p>De acuerdo con la política de la compañía, los empleados tienen la posibilidad de debatir decisiones y de quejarse directamente con el personal de Recursos Humanos o con sus supervisores; durante las entrevistas, los trabajadores confirmaron que hay una política de puertas abiertas, en la cual son libres de hablar directamente con sus supervisores o con el personal de Recursos Humanos, en casos de situaciones relacionadas con el trabajo, o incluso, de problemas personales.</p>	1	

7.8.2	<p><b>Indicator:</b> Evidence of implementation of an emergency action plan and annual (or more frequent) internal monitoring activities</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	<p>a. Copy of emergency (examples include earthquakes, fires, storms, etc.) action plan for prior 12-month period (first audit requires previous 3-month period) and employer testimonial that these plans have been implemented.</p> <p>b. Worker competency in the appropriate actions required during an emergency response.</p>	<p>The company has an emergency action plan and on a regular basis, trainings with participation of all employees are conducted (the last one was conducted on July 7th 2013).</p> <p>La empresa tiene un plan de acción de emergencias y de manera regular, se hacen entrenamientos con la participación de todos los empleados (el último se hizo en Julio 7 2013).</p>	1		
7.8.3	<p><b>Indicator:</b> Evidence of implementation of a verifiable conflict resolution policy for conflicts and complaints tracked transparently, and proof that conflicts and complaints from employees are responded to within three months after being received</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	<p>a. Copy of conflict resolution policy for prior 12-month period (first audit requires previous 3-month period) and employer testimonial that this plan has been implemented.</p> <p>b. Three month time-frame from employee conflict filing and response upheld.</p> <p>c. Records of complaint cases, related actions and resolution maintained as well as worker evaluation of the resolution.</p> <p>d. Worker actions and testimony confirms they understand this process and are comfortable raising complaints.</p>	<p>The company has a conflict resolution policy as part of internal rules, in which steps and procedures are properly identified. The workers receives this information as part of the hiring process, verbally; employees confirmed this through interviews. Records of warnings in which employees has the possibility to challenge company's decisions, were observed to be available on worker's personnel files.</p> <p>La empresa tiene una política de resolución de conflictos como parte de su reglamento interno, en la cual, los pasos y procedimientos están identificados apropiadamente. Los trabajadores reciben esta información verbalmente, como parte del proceso de contratación; los empleados confirmaron esta información a través de las entrevistas. Registros de llamados de atención en los cuales los empleados tienen la posibilidad de debatir las decisiones de la empresa, estaban disponibles en los archivos personales de los trabajadores.</p>	1		
<b>7.9 Criteria: Living conditions for employees</b>		<b>Compliance Criteria:</b>				
7.9.1	<p><b>Indicator:</b> Evidence that living conditions are clean, sanitary and safe for habitation</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	<p>a. Evidence that potable/safe drinking water available.</p> <p>b. Evidence that sanitary conditions for disposal of human waste are in practice.</p> <p>c. Evidence that human waste is not discharged into the environment.</p> <p>d. Employee housing is constructed of material to sustain local conditions in the event of storms or other natural events that could endanger lives.</p>	<p>Clean and drinking water was observed to be available closer to all job positions during facility tour; employees mentioned that is always available and also said that running water, toilet paper and soap are available on bathrooms, which are maintained clean and in sanitary conditions. There are no dormitories available in this facility, since most of employees lives in the surrounding area of the dam.</p> <p>Se observó durante el recorrido por las instalaciones, que hay agua limpia y potable disponible cerca de todos los puestos de trabajo; los empleados mencionaron que siempre hay agua disponible y también dijeron que los baños tienen agua corriente, papel higiénico y jabón, los cuales se mantienen limpios y en condiciones sanitarias. No hay dormitorios disponibles en estas instalaciones, ya que la mayoría de los empleados viven en el área que rodea a la represa.</p>	1		



7.10 Criteria: Community relations and interaction		Compliance Criteria:				
7.10.1	<p><b>Indicator:</b> Evidence that farms are not inhibiting or restricting local community access to public land, freshwater resources or public fishing grounds</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	a. Testimonials from surrounding community members that farms have not blocked access to public property or public natural resources.	<p>Several fishermen who lives in the area and that are working for a fishermen cooperative that also has little tilapia farms in the dam, were interviewed offsite and they mentioned that through the last years, "Acuagranjas Dos Lagos S.A. de C.V." has never blocked access to public property or natural resources, since the roads and docks used by company's trucks and boats, respectively, are public and anyone can use it without any kind of interference.</p> <p>Varios pescadores que viven en el área y que trabajan para una cooperativa de pescadores que también tienen pequeñas granjas de tilapia en la represa, fueron entrevistados afuera de las instalaciones y ellos mencionaron que a través de los últimos años, "Acuagranjas Dos Lagos S.A. de C.V.", nunca ha bloqueado el acceso a la propiedad pública o a los recursos naturales, ya que los caminos y muelles usados por los camiones y botes de la empresa, respectivamente, son públicos y cualquiera puede usarlos sin ningún tipo de interferencia.</p>	1		
7.10.2	<p><b>Indicator:</b> Evidence of implementation of a verifiable conflict resolution policy for conflicts and complaints tracked transparently, and proof that conflicts and complaints from communities are responded to within three months after being received</p> <p><b>Requirement:</b> Yes</p> <p><b>Applicability:</b> All Farms, Farm-Wide</p>	<p>a. Verification of community conflict resolution policy and actions for prior 12-month period (first audit requires previous 3-month period) and community testimonials that this plan has been implemented and there is a shared understanding of procedures for filing complaints.</p> <p>b. Three month time-frame from community member conflict filing and response evidenced by community testimonials.</p> <p>c. Verification that farm management communicates with the community on the impact of its activities.</p> <p>d. If environmental impact assessment has been performed, it is made easily accessible to community members.</p> <p>e. If a socio-economic impact assessment has been performed, it is made easily accessible to community members.</p> <p>f. Economic impacts of the farm activities reported – at least annually – to the community.</p>	<p>It was verified that the company has in place a policy for resolution of conflicts with surrounding community. During a meeting with representatives of several stakeholders (Nicolas Arce, Patricio Rincón and Miguel Arce, representatives of "Bienes Comunales de Ostuacan", José Hernández and Rubén Hernández, representatives of "Comisariado Plan de Ayala", Miguel Ramírez, "Concejal Distrito Pichuca" and Avercio Hernández "Presidente de Ostuacan"), they mentioned that the only conflict that have occurred with the company, was during January and February 2013, in which an external union of construction, in order to try to enter to the company with several representatives, blocked the entrance of the farm and the production plant for almost two weeks, avoiding to the employees to work during that period of time; interviewees mentioned that such demonstration was illegal, the workers as well as the community joined to ask to the president of Ostuacan for mediation in order to solve the situation and at this moment, the company is waiting for an answer from the authorities, since they saw the people of said union for the inconveniences and loss of money during those weeks. Stakeholders mentioned that during that time, employees received their wages normally (this was confirmed by the workers). In addition, they mentioned that the company has supported the local communities of Ostuacan and Plan de Ayala (nearest cities to the farm and production plant), with educational projects, maintenance of roads, sports fields and by selling at low price, fingerlings as well as fish food, to local fishermen cooperatives. In general, they said that there is a good relationship between the company and the surrounding community and that they have not seen any damage or negative impact to the environment generated by company's activities.</p> <p>Se verificó que la empresa tiene una política para la resolución de conflictos</p>	1		
<b>Total</b>				17	1	0