

## ASC Responsible Feed Project

### White paper – Micro Ingredients

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*Within the ASC Responsible Feed Project several Technical Working Groups (TWGs) will focus on what “responsible” should mean for their areas of expertise.*

*These TWGs address the main aqua feed ingredients groups: 1) marine ingredients, 2) terrestrial plant ingredients, 3) terrestrial animal ingredients, 4) micro ingredients and one working group on 5) feed mill requirements and supply chain.*

*As a starting point for the group discussions on what “responsible” should mean, a number of White Papers are drafted (one per TWG). These papers will present an overview of the current environmental and social issues per ingredient group, as well as proposed steps forwards and points of attention. The reason for the development of these papers is to make sure that all members of the relevant TWG have the same starting information. Depending on their stakeholder background and/or expertise, members analyses of, and additions to this information are expected.*

*The key role of the TWGs is to develop draft criteria and indicators for the Feed Standard based on the starting point of these WP’s.*

*Please keep in mind that the points addressed in the WPs should start the discussion, not define its boundaries.*

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#### **Table of contents**

#### **Scope of standard**

#### **Existing standards**

#### **Important clarifications and considerations**

**The section of an ASC Feed standard related to responsible operation of a feed company (feed mill) could contain (this list is not exhaustive and should be revised by the technical working group in this area)**

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#### **Scope of standard**

The ASC feed dialogue needs to decide on the scope of its standard relating to **Responsible sourcing of micro-ingredients for aquaculture feed producers**. In principle a standard relating to this area could refer to issues associated with the sourcing and production of micro-ingredients. For the purposes of this exercise, micro-ingredients are defined as



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vitamins, minerals, synthetic amino acids, pigments, binders, processing aids and other additive-like substances. For consideration to be included in the final standard are requirements that the feed producer should:

1. Keep a comprehensive list of all micro-ingredients, the feeds in which they are employed and the suppliers
2. Have a written environmental sourcing policy that requires the reassurance from micro-ingredient suppliers in the following areas:
  - Compliance with official licences to operate
  - Compliance with specific environmental legislation and regulation relevant to their activities
  - Emissions to land, air and water
  - Waste management
  - Water use
  - Energy efficiency of operations
  - Requirements to do environmental assessments of products along their lifecycle
  - Efficient use of natural resources (raw materials)
  - Occupational health and safety at work - Environmental, Health and Safety
  - Good manufacturing practices
  - Traceability
  - Human rights and social issues relating to work force
  - Engagement with local community

As the definition of sustainability covers a wide range of topics, all the above could be justified as being relevant to cover in a standard relating to the responsible production of micro-ingredients.

In defining the scope it is also important to balance what could be considered specific sustainability issues and criteria related to aquaculture feeds in addition to general requirements. The “sustainability” issues listed above can be regarded generic for any manufacturing business. It would be useful if special consideration could be given to specific micro-ingredients for which there are known environmental issues. This consideration should include proposals on how the risk of poor environmental standards in production could be managed and the resulting products identified and avoided.

### **Existing standards**

Today there are a number of standards that will more or less overlap with the sustainability issues which need to be addressed in the ASC standard and a list of relevant standards used by micro-ingredient suppliers should be produced. Where possible it would be beneficial if the proposed ASC standard recognise some of these existing standards so as to avoid duplication.

Also many topics relevant under the sustainability umbrella should take into account international conventions like the ones of the International Labour Organisation (ILO), as

well as mainstream human rights treaties, most prominently, the International Bill of Human Rights.

### **Important clarifications and considerations**

Before developing a feed standard in detail, it is important to make some clarifications on how comprehensive one wants the feed standard to be. Many of the general requirements related to sustainability are to lesser or larger extent already covered by a number of standards. One needs to decide whether the ASC feed standard should cover these parts or to develop a standard that focuses more on what is considered the most critical and important issues. Looking at today's ASC standards they are very much focused on sustainability criteria related to the sourcing of defined key commodities.

But there are also other issues one could consider as part of the standard

- Requirements to conduct environmental assessments of products along their lifecycle
- Efficient use of natural resources (raw materials)

It is also very important to decide if one wants to include in the sections of the standard relating to suppliers of micro-ingredients a requirement for feed producers to physically audit statements from suppliers or whether written statements can demonstrate compliance to a sufficient degree. Since micro-ingredients, by their very nature, are small volume, high-value products they are regularly transported great distances. Also the large number of products currently being used means that the number of different suppliers could be very high. Therefore, a requirement to physically audit suppliers' production facilities could be very burdensome and this would be particularly true for smaller feed producers, which would not be in the ethos and interests of the ASC standard.

Consideration could be given to the efficacy of using risk-based supplier questionnaires covering the issues agreed upon, which have to be completed satisfactorily by all suppliers and these completed questionnaires would be held at the feed mill and be available for audit to demonstrate compliance to the ASC standard.

**The section of an ASC Feed standard related to responsible sourcing of micro-ingredients could contain (this list is not exhaustive and should be revised by the technical working group in this area):**

#### **Principle 1: General requirements**

*The purpose of Principle 1 is to ensure that all suppliers uphold their license to operate by meeting the legal obligations set by relevant government bodies.*

What should be considered:

The supplier should have documentation to confirm they are in compliance with relevant environmental emissions regulations as the legislation relates to:

- Emissions to air



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- Discharge to water
- Release of toxic or hazardous substances
- Noise, smell and dust pollution
- Ground pollution
- Other relevant pollution

The laws and regulations set by authorities provide businesses with a license to operate in a way that does not compromise the surrounding social and environmental conditions.

Therefore it is important that all suppliers work within these boundaries to avoid causing any harm or dissatisfaction amongst the local communities within which they operate.

### **Principle 2: Manufacture micro-ingredients in a responsible way**

*The purpose of Principle 2 is to ensure that all suppliers understand the environmental, social and economic consequences of their operations and take appropriate action to mitigate any associated negative outcomes.*

To be considered:

- The supplier should have a focus on energy efficiency
- Carbon footprint of manufacturing
- Presence and evidence of a functioning policy for proper and responsible treatment of non-biological waste from production (e.g., disposal and recycling)
- Incidences of uncontrolled discharges of waste and effluents into the environment are recorded and corrective actions taken when necessary
- Waste materials that contain hazardous levels of contaminants are disposed of properly
- Offer customers packaging solutions that reduce the amount of post-sale packaging material used and/or increase the amount that is recycled post-use

### **Principle 3: Employee rights**

*The purpose of Principle 3 is to ensure that all suppliers understand and respect basic human rights and employee rights.*

To be considered:

- Address child labor
- Evidence that workers are free to form organizations, including unions that provide opportunity to advocate for and protect their rights
- Harassment or discrimination of employees based on personal background, race, gender, nationality, age, sexual preference or belief

### **Principle 4: Engagement in local community and stakeholder engagement**

*The purpose of Principle 4 is to ensure suppliers engage with their local communities in a good way.*



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To be considered:

- Local community engagement
- Engage with stakeholders to determine important sustainability issues for the business