

## **Attendee feedback at ASC Feed Standard Consultation sessions**

### **Thailand, Vietnam, China and Chile – August 2015**

#### **Introduction**

Each session involved a presentation from Michiel Fransen and Duncan Leadbitter on the background to the ASC Feed Standard and the key components of the current draft. A copy of the presentation is provided.

In each case questions were taken both during and after the presentation and were facilitated by interpreters where required.

#### **Thailand**

A list of attendees is provided.

Questions and comments from attendees are as follows:

Criterion 2 - requirements for divulging energy, water and emissions data.

**Question 1**- are there limits for emissions?

**Answer** - no limits at this stage but there are requirements for data collection and transparency. There is a requirement for a plan to reduce the emissions.

**Question 2** - for a factory that produces feed for both aquatic animals and terrestrial animals then are both required to be certified?

**Answer** – it depends on whether there are separate production lines. If the lines produce both feeds (at separate times) then both will be certified but there is no value for terrestrial feed.

Criterion 1.8 - traceability - physical separation, book and claim or mass balance

**Comment** – there are lot of traceability requirements already in place.

**Question 3** - in regards to nitrogen and phosphorus - does this happen at the farm level?

**Answer** - no, just needs to be disclosed on the feed bag as to the amount that is in the product.

**Question 4** - in regards to emergency plan. Is there a need for mock testing required?

**Answer** - not necessarily but there is a need to demonstrate that the plan and its elements are in place. Should ASC specify what is in the plan? Needs discussion.

Two inputs into fishmeal: whole fish vs. trimmings > two parts with requirements in standard.

**Question 5:** is it aquatic or marine (sea vs. freshwater trimmings)?

**Answer:** it is aquatic in that both marine and freshwater components are included. **Comment:** please keep in mind that the local interpretation of "marine" (aquatic), might be real "marine", and

not aquatic.

**Comment:** there were only two people from Asian on Technical Working Group -Marine. There is only 1 IFFO RS plant in Asia (Thailand) as of last year, and few FIP's. So the requirement has to be applicable on "Asia-level". The solution has to come from people in the room.

**Response:** this part of the world uses a lot of byproduct which have lower level requirements in Standard (one possible solution), but byproducts limit possibilities in feed formulation.

Questions/remarks on TWG-Marine percentages: participants will think about it and may send in comments by email.

**Question 6:** please clarify what is a "approved" FIP.

**Answer:** one option is to use a definition based on US Conservation Alliance for Sustainable Seafood (CASS). However there would need to be arrangements put in place for fisheries not heading for MSC.

**Question 7:** what is meant by ' accidental' mortalities?

**Answer:** this needs rephrasing to focus on potential mortalities that cause health issues.

**Question 8:** with regards to krill - is there a current monopoly and are there other companies seeking to get involved?

**Answer:** ASC could allow certified meal but some companies may be under NGO pressure to not use it.

**Comment:** palm oil is used mainly for cooking. None being used in shrimp feed, maybe small volumes being used in Pangasius feed.

**Question 9:** what are the impacts of animal production? Land clearing etc. is a big issue but this is prior to rendering. How practical is it to go back to the farm?

**Answer:** main producers of animal byproducts are countries like EU, US, Australia etc. Can trace back to the rendering plant.

**Question 10:** will there be regional variation in percentages?

**Answer:** it is easier to have one figure and some sorting out to be done for allowing regional differences versus fairness.

**Comment:** the presentation didn't cover Sections 2.3, 2.4. e.g IUU.

**Response:** these sections were put up on the projector and Michiel walked the group through the requirements. Still to be defined as to how to do this. **Comment:** government still also trying to sort out what is a destructive fishing method - hasn't mentioned trawling.

**Comment** – in regards to 2.4.4 - traceability requirements for EU IUU are for human food but this has been extended to fish meal production (MCPD). Not clear whether the rules are being adhered to. At the moment it may not be possible for the industry to comply. Could be resolved in the next

year or two depending on how the government acts. Thailand may be under pressure but there are other countries where the same issues are present but maybe there is not action being taken.

**Comment** - need to ask for area and time of fishing. Need to be aware of transshipment and whether catch logs go with the fish.

**Comment** – in terms of dealing with byproduct – tuna and surimi processing wastes which are common sources in Thailand one needs to also consider for China the inclusion of white fish based meals. There is a limited amount of meal made from salmon processing (mainly oil).

**There was a discussion about 5.1 and 5.2** - not clear whether these go back to the vessel or just the fish meal factory. Need to clarify. Duncan said it was fish meal plant, not vessel. One attendee suggested it may be achievable for meal plants. Michiel, if it goes back to vessel then the challenge is for how the meal plants gather evidence for the audit. Needs to stop at gate of fish meal factory.

## Ho Chi Minh City

A list of attendees is provided.

**Question 1** - re 1.6 - how is the product impact calculated (N and P)?

**Answer:** It is often calculated by the manufacturer of the ingredient but may not always be simple. The audit manual will spell out the detail. P and N may be a huge task. Can be simply done by looking at feed in and fish out - will provide an assessment of the amount excreted. However, this is the farmers job. For the feed standard the mill only has to declare what is in the feed.

**Question 2** – one attendee's company uses mainly GMO soy. What does she do if client wants non-GMO?

**Answer** - ASC has no view on whether GMO good or bad. Majority of canola and soy is GMO. Markets want disclosure in order to make a choice. If the company supplies non GMO product then it can be reported to the auditor but there is no requirement to disclose it on the label.

**Comment** - The requirement for disclosure is only for use of GMO. There are registration issues here in Vietnam as authorities have to register the use or not of GMO. Can it be done via a public statement and not on the label? Could it be done via B2B letter? Could it be done via bar code?

**Question 3-** re 1.3 - if the energy is renewable energy what needs to be done?

**Answer** - There is no baseline or requirement and the current focus is on information collection.

## Principle 2

**Comment** – re 2.4: Vessel traceability is impossible in Vietnam. It can be traced back to the supplier, but not to the vessel. **Comment:** fish meal association is working on traceability (promote log book use and monitoring).

**Comment:** many processes are happening (IFFO, GMP+, etc.), and only after that is done, ASC can be

accomplished by his company. Assistance to suppliers is needed in order to succeed for ASC.

**Question 4:** do we rely on vessels to send information, or do we need to visit vessels ourselves (as auditors)?

**Answer** – there may be a variety of possibilities that could be investigated to avoid the need for vessel by vessel checks. For example, it may be possible to set-up legal contracts for B2B sales, and if requirements are stopped, then contract is stopped.

Principle 3

**Comment:** a lot of soya bean is used in Vietnam. Availability and price of certified material could be an issue.

**Question 5:** what are the 'equivalents'?

**Answer** - It is keeping the door open to new schemes being recognised. If there are other schemes that feel they are equivalent then there will be an opportunity for them to convince the ASC. It is the responsibility of the scheme owner to make the approach to the ASC and do the benchmarking.

**Question 6:** what would be the best percentage?

**Answer:** That is what we are seeking suggestions for!

**Question 7:** how to make the contact with suppliers of certified material?

**Answer:** ASC has been in contact with scheme owners to find out what may be available and some easy access system may be useful.

**Comment:** sometimes there is conflict in judgements about the same species - IFFO can supply certified anchovies but FishSource score may not be high enough.

**Guangzho**

A list of attendees is provided.

**Question 1:** GMO material is difficult to detect. What is the risk here?

**Answer** - Transparency is simply to ensure people are informed and not a judgement about whether it is good or bad.

**Comment:** similarity to FSC. Yes, and there is also overlap with GMP+, GAA and GlobalGAP.

**Question 2:** how do you think about traceability? What is needed?

**Answer** - 2-level feedback is needed: 1) the compliance of the fish meal supplier (whether or not they are IFFO RS certified), and 2) where the fish comes from that feeds into the plant (and if the fish complies with the set requirements).

**Question 3:** if there are some existing certifications in place then it makes approval easier?

**Answer** - The standard was drafted to reduce duplication.

**Question 4:** ACC (GAA?) - what is the relationship between them and ASC?

**Answer** - There is a dialogue between the two schemes to help reduce duplication

**Question 5:** what is responsible versus sustainable - need a definition? The draft standard covers a lot and could be very onerous. An energy audit could take many days. Need to focus on some key aspects.

**Answer** - There is both a standard and an audit manual where the detail will be spelled out and this may help reduce the perceived burden.:

**Question 6** - ACC has a feed standard and a star rating. For ASC, the process may take some time. Can the logo be used on products?

**Answer** - under the current farm standard there are feed requirements but the factory owner does not get a certificate. This will prevail until the new feed standard comes in. Once the feed standard comes in it does not automatically mean that the feed mills are certified automatically. The arrangements for this transition period are yet to be determined.

**Question 7:** for BRC there is some mechanism for recognising those that are not yet in full compliance. Can this be done by ASC?

**Answer:** To some degree. The issue is recognised but the actual arrangements not yet finalised.

## Chile

A list of attendees is provided.

Principle 1

As per slides

**Question 1 – what are the requirements for soya oil? Unclear from slide.**

**Answer** - the standard applies to all soy products not just oil.

**Comment:** if this is a global standard – will the certification cover all regions of the world? Countries should have national requirements on waste water. If Chile has very strict requirements and Asia doesn't then how is that comparable?

**Comment:** with regards to the requirement that there cannot be any incidence of discrimination. If this is absolute then it is hard but if there is a resolution mechanism in place then it is more workable. In the farm standards this is possible and this should flow into the feed standard.

**Question 2:** how to address ingredients that are less than 1% (e.g. pesticides) that may have a high impact? **Comment:** some of these materials may not be part of the ingredients as such. Antibiotics

are one example. May or may not be in feed, depending on buyer requirements and they won't be more than 1%.

**Question 3:** many mills are BAP certified and it seems that ASC is looking for some level of overlap?

**Answer:** GlobalGAP is part of the committee designing this and there are efforts underway to make the various standards work together. There is, for example, an MoU between ASC, GlobalGAP and GAA to address the farm standards. Aim is to do this for feed as well.

**Question 4 –** is the mill required to take ownership of on-farm pollution?

**Answer:** Feed mill owner is not required to take ownership of farmers' actions. Requirements for N and P regarding labelling are there to assist farm based calculations.

**Question 5:** what is meant by book and claim?

**Answer -** Green energy example given.

**Question 6:** what are aims of the indicators for traceability? Are these about checking materials used? Will there be new indicators or will it rely on existing ones for GlobalGAP etc.

**Answer –** the aim is to ensure as much overlap as possible.

Marine section.

**Question 7:** regarding FIPs, about "approved", versus "multi-stakeholder approved". What is the recognition process?

**Answer –** an explanation was provided about the existing available FIP's and their specific targets (MSC, IFFO etc) and how they work. It is clear that this point needs to be clarified by the ASC/SC/TWG.

**Comment:** traceability of meal/oil coming from FIP's is bad/not possible. 100% compliance to IFFO RS is suggested.

**Comment:** the background to the inclusion of the FIP concept being included in this standard was provided and that they are proposed placeholders for the future.

**Question 8:** please clarify of what is required initially, and on what is required over time.

**Answer:** the process for changing "demands" over time was explained.

**Comment:** you do not consider MSC and IFFO RS as equivalents. The attendee proposes the "freedom" to choose from IFFO RS, or MSC. They should not be separately, but combined and the freedom of the feed mill to choose one of the two.

**Question 9:** there is no percentage given. What is your (ASC) idea?

**Answer -** there is no preferred percentages from ASC's side.

**Question 10:** please clarify the management system with regards to the specific requirements of 2.1.2.1 and 2.1.1.3 and 2.1.2.2.

**Answer** - the requirements of the Standard were read out and attention drawn to the slide addressing criterion 2.1. There was a brief explanation of the discussion between MSC and IFFO on the ecosystem management system.

**Comment:** IUU requirements may be difficult (regulations might be in place – compliance/checking against them is hardly ever present). **Comment** : Duncan explains intent behind criteria and possible solutions (legal binding contract that allows mills to break the contract in case of violation).

**Comment:** farmed salmon has a different omega-3/omega-6 ratio compared to wild salmon, and therefore it is less healthy for end consumers. The end consumers need to know this.

**Comment:** antibiotics (incl. residues from farmed animals antibiotics) and GMO should be printed on label.

**Comment:** no traces of antibiotics are found in fillets (this depends of course of the accuracy of the measuring methods).

**Question:**

**Michiel – everybody has their own ideas on what the standard should be but this also needs to be realistic, hence the timetables have many years built in.**

**Comment:** there is a big gap between requirements for marine ingredients versus others. Why so strict for one ingredient and not for others? Marine ingredients are a low proportion of the feed and have a lower impact. Need to have the same bar. **Answer** - fish meal has been a big issue for stakeholders. Not much involvement from those with concerns about land plants. Availability of existing standards has also played a role.

**Question 11:** what were the discussions in the other the other workshops?

**Answer** - Very similar to here. More focus on ingredients other than marine.