

FEEDBACK FORM

ASC Operational Review - Pangasius Standard - Public Consultation August 2017

Pangasius Stakeholder Submissions 21 Aug to 21 Oct 2017

Feedback on ASC Pangasius Standard Consultation

Organsiation	Item:	Your feedback:	Rationale behind your feedback:	Your proposed change:
WWF VIETNAM	Item 1: Add indicator limiting number of treatments of antibiotics	1 - Agree that need to measure in kilograms of active ingredient of individual antibiotics/mt of fish 2 - No need to set the limit number of treatments of antibiotics 3 - Should require on no substist antibiotics in the fish raw material	1 - There is no significant impact if measure the number of treatment of antibiotics. Example, How do you compare the 2 following farmers: 1st farmer uses 2 treatments, but each treatment prolongs 10 days; the other farmer uses 5 treatments, but each treatment prolongs 3 days. 2 - There is no scientific evidence that proves the numbers of treatment of antibiotics effect on environment or quality of product	6.2.9 should be: Combine the number of treatments and number of day treatment of antibiotics and apply after 2 years from updated version is available
IFFO	Item 2: Update 'What the ASC does' section	Remove the term "or eliminate" so the text refers to minimise only. Elimination (of the environmental footprint) is not a realistic goal, as all farming operations have an environmental footprint.		remove "or eliminate"
	Item 3: Update 'What the ASC will achieve' section	No comments		
	Items 4, 5, 6: Formatting changes	No comments		
	Item 7: Indicators: 2.1.1, 2.2.1	No comments		
	Item 8: Indicator: 2.2.3 and 2.2.4	No comments		
SNP	Item 9: Improve consistency of feed requirements and remove ambiguity for indicators 5.1.5 and 5.1.6	We recommend changing the requirement of ISEAL certification to IFFOR RS or equivalent certification, with regards to fishmeal and fish oil.	ISEAL certification of fishmeal and fishoil is very limited, as is recognized in the salmon standard. IFFO RS certification provides an assurance of responsible sourcing, quality controls and other considerations, and is increasingly used by producers of fishmeal and fishoil.	
IFFO		Suggest to replace ISEAL certified fishmeal and fish oil with reference to the IFFO RS - or equivalent - certified products	ISEAL-certified fishmeal and fish oil is limited in supply. IFFO RS provides a responsibly-sourrccd alternative that could support responsibly farmed pangasius and so lack of suitable feed ingredient material will not be a constraint to the growth of certified pangaisius.	Replace ISEAL certified with IFFO RS

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WWF VIETNAM	Item 10: Remove ambiguity around prohibition to site or expand farms in natural wetland or areas of ecological importance	<p><u>About the indicator 2.2.1</u> 1 - ASC should clearly define the natural wetland. Natural wetland is the RAMSAR site, isn't it?</p> <p><u>About rationale of Criterion 2.2</u> 1 - What does the phrase "the impact of assessment" refer to? (linked with what indicators/criterion?) 2 - How to identify the time in the word "previously"? (the time of farm establishment, or the year of ASC standard was issued, ect.)?</p>	<p><u>About the indicator 2.2.1</u> 1 - The farmers are confused about the term "natural wetland" 2 - The defination of "Natural wetland" can not be found in Ramsar website.</p> <p><u>About rationale of Criterion 2.2</u> The term of "the impact of assessment previously" makes the farmers confuse</p>	
	Item 11: Change in species scope definition: clarify that the ASC Pangasius Standard is applicable to the family Pangasiidae	No comments		Replace ISEAL certified with IFFO RS or equivalent
WWF VIETNAM	Item 12: Clarify energy requirements in Indicator: 3.6.1	Not easy for farmers to measure that indicator.	<p>1 - For the period of 1 year, there are a lot of differences on: the volume of harvested fish and volume of fish in growing ponds because: - all the ponds are not stocked at the same time, and - 1 production cycle lasts long around 8 months. 2 - Farmer uses energy not only for pangasius production but also for transporting and other activities at the farms.</p>	<p><u>About the indicator 2.2.1</u> For ponds, evidence farm has not been sited or expanded in Ramsar sites and protected areas</p> <p><u>About rationale of Criterion 2.2</u> ASC should have mechanism to use the restoration fund 0.5 USD per MT of fish include studies on impact of ASC certified farm on environment and social</p>
WWF VIETNAM	Item 13: Clarify Total Nitrogen (TN) testing methodologies	No need to mention the testing methodologies Limit the number of fish pond to collect for testing TN and TP after ASC certified	There are a lot of methodologies that can be used for measuring TN, TP. From the 2nd year of ASC certified, the farm has to test TN,TP of all the fish ponds. It costs a lot, approximately 5,000 USD, while the farm's production technique remains the same.	
WWF VIETNAM	Item 14: Require GMO feed ingredients disclosure	Do not require for farm, consider in ASC feed standard in the future	Farmers depend on feed company. GMO products create the impression of sensitive/negative information for buyers	Should be clarified how to measure the relevant indicator such as: The MT of harvested fish and estimated MT of fish in raising ponds - not harvested yet.

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WWF VIETNAM	Item 15: Clarify ASC standards around social impact assessment	Agree, but should to clarify in name of indicator 7.13.3		The TN, TP results can be from ISO-17025-certified laboratories and has the accuracy as equivalent as required in the standards. Propose to collect random of number fish ponds to test TP and TN; and collecting 1 sample by auditor when on site visit.
WWF VIETNAM	Section 2: Ongoing consultations on the Pangasius operational review	item 16: the desired objective should be limiting change of ecosystem rather than eutrophication at the received water bodies.		Should be apply for feed companies in feed standard and ensure confidential information
WWF VIETNAM	Any other comments or suggestions	Indicator 6.5.2 Maximum fish density at any time for ponds and pens is 38kg/m2 that do not need to require the exact number.	With the development of technology in aquaculture, it is necessary to encourage farmers to apply new technologies in promoting high volume production while ensuring animal welfare and environmental protection.	7.13.3 The social impact assessment is being implemented by the farm
WWF Vietnam	How to avoid the animal welfare issues associated to antibiotic usage?	WWF seeks to minimize the impact of antibiotics usage in enviroment and human health while ensuring the animal welfare and production efficiency. Therefore, responsible limitis for antibiotic use need to be defined based on impacts, current performance	In other ASC indicators 6.2.5 ASC require farmer use antibiotics follow guideline of WHO and the Pangasius farmers also have to comply with requirements in antibiotics use related to the government laws of importing countries. An additional metric that can further indicate and drive responsible antibiotic use across the industry will ensure the credibility of the standard for pangasius as well as consistency across standards	ASC needs to gather data on antibiotic usage in pangasius farming and using the that data determine where to set this metric so it will represent a bar for responsible use that allows for effieicny and animla welfare to be maximized but indiscriminate use of antibiotics to be minimized, aprticularly given the short growing cycle for this fish
WWF Vietnam	Which option on antibiotic treatments is preferred, and why?	WWF as a network believes that a limit number of antibiotics treatments should be set but it needs to be based on best practice and appropriate levels to represent top performers (better than 50%).	No evidence that indicate how many treatments or days of antibiotics treatment affect on animal welfare and environment	If proper data does not currently exist, require certified farmers to record the data of antibiotics with amount and number of days, treatment of antibiotics type usage. This data can eventually be used to set an appriprate standard.

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WWF Vietnam	How should the auditing method for antibiotics be carried out? Is chemical testing appropriate?	WWF is not an expert on residue testing but if testing is appropriate, it must be shown that it is an effective way to determine whether chemicals or antibiotics were actually used on the farm/ fish. The rationale for such an approach should include information on such effectiveness	If such methods are reliable, great. If not, or can easily be cheated, it gives a false sense of security	
WWF Vietnam	What should the limit on antibiotic treatments be over the Pangasius production cycle?	It should be based on clear aggregation of existing data. The bar should be set at least for the top 50% of performers and represent good practice. The number should also take into account that pangasius growth cycle is less than 1 year so overall allowed treatmetn should reflect that number	Because this type of approach will yiefl a standard that reduces impacts and maintains the credibility of the standard	It should be based on credible trasnparent data as described elsewhere in this feedback form
WWF Vietnam	What should the energy consumption limit be for pangasius?	same comments as above. Data should be collected. If it exists, limite can be set at a level that represents good performance. If not, data should be collected trhough certified farms so a metric can be set. We are disappointed that ASC hasn't already been collecting and aggregating this type of data for previously certified farms.		
WWF Vietnam	What should the diurnal oxygen demand metrics be revised to?	If this metric is going to be revised it must be replaced by something that indicates same nutrient related dynamics	The desired objective should be limiting change of ecosystem rather than eutrophication at the received water bodies.	More researches on species structure and component of benthos
	Does new evidence exist of species establishment?			
	Proposed growth rates. What should the ASC be setting its growth rates at for Pangasius now?			