

## FEEDBACK FORM

### ASC Operational Review - Salmon Standard - Public Consultation

PTI Stakeholder Submissions 21 Sept to 21 Oct 2017

### Feedback on replacement PTI indicator consultation paper

Organisation	Item:	Your feedback:	Rationale behind your feedback:	Your proposed change:
<b>Accol</b>	1: What general comments do you have on the proposals to revise the PTI requirements in the Salmon Standard?	We concerned about ASC's claims of best practice are inconsistent with where these compliance metrics are set, according to the ASC's definitions of best practice these metrics should be set at much more stringent limits (i.e., 20-30th percentile) on a regional basis. This concern is also reflected in the changes to the FFDRm and FFDRo values that were presented in the second comment period - Global Salmon Initiative data (accounting for 50% of the industry, excluding Ireland and the king salmon farm) between 2013-2016 the average FFDRm was 0.83 (with a standard deviation of 0.21) and the average FFDRo was 1.93 (with a standard deviation of 0.43). Only 7 out of 80 company/year results	In Table 1 of the the Consultation paper, no values are shown for the 20th percentile, which would be consistent with ASC's initial certification target (top 20%). Likewise, there seems to be little consistency between the proposed Entry Gates (why is Chile 11 but Scotland 9 when the data are so similarly distributed?). Additionally, we disagree that Pacific Canada's data are removed from defining the GT and that the current GT would be set well above the 66th percentile for this region.	If ASC is going to use this metric, it should set much more stringent limits (i.e., 20-30th percentile) on a regional basis, including for Pacific Canada. The term "Global Target" should be replaced, since the Global Target should eventually be zero, this should instead be the global 20th percentile value (including data from Pacific Canada) and act as an indicator of relative stringency for the public. Unless ASC can demonstrate the effectiveness of this type of future reduction indicator for other issues, Indicator 5.2.6 should be removed and replaced with a review and reset of the (20-30th percentile) target in three years as part of an operational review. We also believe the FFDRm and FFDRo limits
<b>MARK FAST</b>	"...farms shall not use treatments that have been banned by any of the regulatory bodies in the world's largest salmon-producing or importing countries..."	Not sure this should be applied.	If a product is banned by one country but already/still in use in other countries, its import and or export will be governed by the laws of the countries involved. If the importer and exporter are ok with the use of this product I don't see why there should be a forced/adopted ban because one other country has banned it.	Safer to stay with,"... it is a farm's responsibility to operate within the law and this involves taking appropriate measures that its product complies with the import and export laws of the countries where the product is eventually sold."
<b>WWF</b>		While there are obvious downsides to going with a regional approach continuous improvement in terms of credibility, WWF is generally supportive o the outlined approach and of revising the PTI. However, the specifics including the EG WMNT values need to be based on credible and trasnaprent data to be meaningful and acceptable - WWF proposes to ban all use of chitin synthesis inhibitors as delousing agents. Flubenzuroner is a kind of substance that inhibits chitin production in the shell of crustaceans. - Hydrogen peroxide: the use of hydrogen peroxide should be included in the PTI standard and monitored closely as we are not sure of what the	This is a big chane, if ASC take sa drastically different route from intial stakehodler agreement, it needs to be credibly justified and explained	The TWG needs to reasses the current data and objectives and run an efficient process to gather more data and develop credible adnn trasnaprent justification for the approach and numbers. Then this needs to be put out for an additional consultation before teh PTI can be revised.
<b>FIDAR</b>		Criterion 5.2.14 requires a list of therapeutants used in production to be made available to buyers, however there is no requirement for the list to be made available to the public.	A list of therapeutants used should be publicly available in order to provide increased transparency and enable stakeholders that utilise neighbouring environments to make informed decisions.	Require a list of therapeutants used to be made publicly available under Criterion 5.2.14.
<b>BCFSA</b>		The BC Salmon Farmers Association is generally supportive of the proposed changes to the PTI requirements for the Salmon Standard.	Suggested changes will help drive improvement in sea lice treatments globally. The global target gives a level of parity to be targetted across all regions. Requirements for other integrated pest management measures drives a movement away from dependancy on the use of therapeutants and helps to reduce their overall application.	N/A
<b>BC CAHS</b>		BC CAHS is generally supportive of the proposed changes (salmon standard)	More than one tool in the tool box is required for the reasons cited. Parity through globalized targets is important.	

Feedback on replacement PTI indicator consultation paper				
Organisation	Item:	Your feedback:	Rationale behind your feedback:	Your proposed change:
Accol	2: What level should the entry gate values be set at?	See proposed change		20-30th percentile on a regional basis, including for Pacific Canada.
MARK FAST		Entry gates set at acceptable level	The entry gate level encourages constant improvement, across all regions.	N/A
WWF		The Entry Gate values should be based on clear, transparent, representative data from each relevant region. Currently we are unsure if the data presented and on which the numbers are based is adequate for setting this.. In addition to each individual entry gate level, a decision needs to be made to set at 50 or 66 percent	The TWG needs to go through the data that was presented and finally understand exactly what it represents from each country, and then what the TWG is aiming for in general for this level. Need to decide what the ideal data is that is needed to determine this and then look at the realities of available data and decided if they are closely enough aligned to continue with this approach	start by clarify current data, defining data needs and collection new data to define these numbers as well as consensus about where they should initially be set. WWF would recommend 50 rather than 66 of current practice but based on data that is transparent and credibly representative of an entire region over several production cycles (to account for natural infestation variability). Also needs to consider species and whether separate values need to be set for the various species
FIDAR		The original regional/country entry gate levels calculated should be used without adjustment.	Adjusting the regional/country entry gate levels suggests adjustment is made to include as many farms as possible. If other regions/countries can achieve lower levels, assessment should be made of other possible factors such as variation in farm siting, legislation and farming practices (such as closed or semi-closed containment) to seek explanations for this, rather than adjusting the regulations to fit the present levels. Having a Global Target reduces the bias, however the rate of reduction of levels required (25% in 6 years) is a long timescale which will take	Increase the rate at which the level should be adjusted from Entry Gate values, for example 50% in 6 years.
BCFSA		Entry gates set at acceptable level	The entry gate level encourages constant improvement, across all regions.	N/A
BC CAHS		Establishment of gate values needs to be set at a level acceptable for all parties in consideration of the need and impact.	This encourages constant improvement.	
Accol	3: What level should the global target value be set at?	See proposed change		The term "Global Target" should be replaced, since the Global Target should eventually be zero, this should instead be the global 20th percentile value (including data from Pacific Canada) and act as an indicator of relative stringency for the public.
MARK FAST		Global targets are set at acceptable level	Setting of global target at top 20% of producers globally is consistent with other ASC metrics	
WWF		Same comments as above cell. To note, setting this at level equivalent to 20% of global performance now and allowing many years to move towards that via 25% reductions may not be strict enough.	same data approach outlined above	same data approach as outlined above
FIDAR		The Global Target should be reduced to 2, with specification that where 1 treatment requires 2 applications this will be taken into account.	The WNMT Global Target of 4 is based on some bath treatments requiring 2 applications. There is potential to abuse this by selecting treatments which have 1 application and can therefore be applied 4 times under a WNMT of 4.	Specify that the WNMT applies to 2 treatments, of which each may be 2 applications if required as part of that treatment.
BCFSA		Global targets are set at acceptable level	Setting of global target at top 20% of producers globally is consistent with other ASC metrics	N/A

Feedback on replacement PTI indicator consultation paper				
Organisation	Item:	Your feedback:	Rationale behind your feedback:	Your proposed change:
BC CAHS		It is set at acceptable levels.	This fits in with other criteria, such as ASC.	
Accol	4: Are the proposed measures of IPM in the appropriate categories? Are there missing ones?	Add the use of broodstock from stocks undergoing selection for sea lice resistance.		
WWF		We are slightly confused as this category seems to be qualitative descriptors for the IPM ladder that suggest how adoption can lead to the required continuous improvement reduction	metric possibly focused on the actual reduction rather than listing IPM options	this should be focused on the metric for improvement. While we recognize the fluctuating nature of treatment use mere 25% over 6 years (3 production cycles) could be stronger.
MARK FAST		There needs to be some baseline info for the drugs with respect to performance in bioassays, so some initial and consistent monitoring needs to be in place before suspected resistance can be tested. Also bioassays should be one tool that should be used to validate and develop better molecular tests.	Bioassays are inherently variable, and so health of lice (required survival of control animals) need to be set from regions, as well as the seasonal fluctuations on performance of lice in bioassays. For this reason movement towards more stable and sensitive molecular tests is warranted.	Bioassays are to be used as indicators for development of resistance, however, to obtain accurate data on drug performance in bioassays, a baseline of bioassay data for each drug should be determined (accounting for seasonal variability in response and health of animals entering tests) within a region first and requires regular testing to identify emergence of resistance. Furthermore, molecular and other tests that can be performed without influence of seasonal and responsive variability of collected lice, should be pursued.
FIDAR		At present according to available knowledge the proposed measures of IPM seem to be in the appropriate categories.	Proposed measures seem adequate at present, however regular reviews should consider whether any changes are required.	Review timetable to include a set period of time after which to conduct a review.
BCFSA		No comment.	The encouragement of IPM measures is supported to help diversify management of sea lice beyond dependency on therapeutants.	N/A
BC CAHS		Generally yes.	IPM helps diversify responses on a non therapeutic to ecological response. It helps prevent tolerance to treatment.	
BC CAHS	5: Is the proposed environmental monitoring feasible and sufficient?	We could use more on the west coast of Canada	The topic is not studied well enough to give valid models such as in other areas, such as genetic markers. We have 'new' lice come in with returning salmon each year. As well, we have a very slow regulatory mechanism.	More research dollars are required to unpack the problem and develop tools.
WWF		WWF does not have strong comments on this		to note:- WWF Norway proposes to ban all use of chitin synthesis inhibitors as delousing agents. Flubenzuroner is a kind of substance that inhibits chitin production in the shell of crustaceans. - Hydrogen peroxide: the use of hydrogen peroxide should be included in the PTI standard and monitored closely as we are not sure of what the effects of the use of hydrogen peroxide will be on the immediate environment. o Suggest setting a bar on how much hydrogen peroxide one can use before one have to report the use. This to get a clear estimate on how

Feedback on replacement PTI indicator consultation paper				
Organisation	Item:	Your feedback:	Rationale behind your feedback:	Your proposed change:
MARK FAST		Not currently for sites in Canada.	In Canada, there are currently no scientifically validated tools such as direct assays or models that have been approved by national regulatory bodies for the monitoring of treatment agents in the sediment and water.	Support development of tools for modelling and monitoring residues in the environment, and research to provide contextual understanding of values. Revisit environmental monitoring requirement at future standard revision when models/monitoring is better understood.
FIDAR		Criterion 5.2.8 states that direct assessment of the fate of agents is 'encouraged', however this should be a requirement.	Environmental levels of chemical agents are of significant importance. With a lack of baseline data there is therefore a need to assess levels both in areas adjacent to the farm and in areas likely to be affected through dispersion.	Require direct assessment of the fate of agents under Criterion 5.2.8.
BCFSA		Not currently for sites in Canada.	In Canada, there are currently no scientifically validated tools such as direct assays or models that have been approved by national regulatory bodies for the monitoring of treatment agents in the sediment and water.	Support development of tools for modelling and monitoring residues in the environment, and research to provide contextual understanding of values. Revisit environmental monitoring requirement at future standard revision when models/monitoring is better understood.
BC CAHS	6: Are the requirements for farms to meet sufficient without a limit being applied to PL?	Yes	There are a number of reasons for this in BC, fish health, repeat treatment, drug efficacy.	
WWF		We are unsure what PL refers to? Assuming Progress ladder? WWF prefers a metric that encourages innovation rather than predefined steps that may already be widely adopted with regard to innovative practices and non medicinal treatments		
MARK FAST		Yes, the requirements are sufficient without being applied to PL.		

Feedback on replacement PTI indicator consultation paper				
Organisation	Item:	Your feedback:	Rationale behind your feedback:	Your proposed change:
FIDAR		A limit should be applied to PL.	A precautionary principle should be used with a limit applied to PL. Monitoring and assimilation of data can lead to a review once more data is available.	Apply precautionary limit to PL.
BCFSA		Yes, the requirements are sufficient without being applied to PL.	BCSFA agrees with the justification around no longer relying on a PL. 1) it does not take in to account the health of fish and efficacy; 2) it is outside the control of the farm; and 3) the quantity of active ingredient varies by medicine. Also, in order to treat a stock it may be necessary to repeat doses as determined by a veterinarian.	N/A
BC CAHS	7: Is the WNMT limits feasible? Are they sufficient? Is it necessary given the other requirements?	Yes, I think so. Re-evaluation needs to be considered after meeting the global target. Things have to keep improving.	If you meet your target, there should be no further reductions.	
WWF		Limits? Meaning EG and GT? Or is this refering to the reduction?		WNMT reduction by 25% every 3 production cycles might not be fast enough.
MARK FAST		Yes, the WNMT limit is feasible. However, it should be better clarified that there is no reduction required onced the global target is being met.	This is currently missing from the text around WNMT limits.	Text should be added to specify: No additional reductions in WNMT are required once the GT has been met.
FIDAR		The original regional/country entry gate levels calculated should be used without adjustment. The Global Target should be reduced to 2, with specification that where 1 treatment requires 2 applications this will be taken into account.	Adjusting the regional/country entry gate levels suggests adjustment is made to include as many farms as possible. If other regions/countries can achieve lower levels, assessment should be made of other possible factors such as variation in farm siting, legislation and farming practices (such as closed or semi-closed containment) to seek explanations for this, rather than adjusting the regulations to fit the present levels. Having a Global Target reduces the bias, however the rate of reduction of levels required (25% in 6 years) is a long timescale which will take some regions such as Scotland and Chile a long time (i.e 12-18 years) to achieve. The WNMT Global Target of 4 is based on some bath treatments requiring 2 applications. There is potential to abuse this by	Increase the rate at which the level should be adjusted from Entry Gate values, for example 50% in 6 years. Specify that the WNMT applies to 2 treatments, of which each may be 2 applications if required as part of that treatment.
BCFSA		Yes, the WNMT limit is feasible. However, it should be better clarified that there is no reduction required onced the global target is being met.	This is currently missing from the text around WNMT limits.	Text should be added to specify: No additional reductions in WNMT are required once the GT has been met.