

## Appendix from Dansk Akvakultur

### Comment on public consultation - ASC FRESHWATER TROUT STANDARD ver. 1.1. 2. draft

#### This feedback is on behalf of the Danish fish farmers.

2.5.2: see the Feedback submission form.

#### 3.1.4

*“Well depths are tested at least annually, and results made publicly available”. Food note 30:* Well depths must be tested at similar times of the year, with results submitted to ASC. Wells that are by law or permission not allowed to be opened are exempt from this indicator.”

Thank you for the change, but please add “or permissions” to the food note 30. The rationale is that the Danish law doesn’t say anything about opening a well, but the water extraction permit can hold this clause.

#### 3.2.1

*“Maximum total amount of phosphorus released into the environment per ton (t) of fish produced over the previous 12-month period”.*

We suggest to change this to be more specific, thus *“Maximum total amount of phosphorus released into the environment per tonne (t) of fish produced over the last calendar year”*. This will make it clearer for all parties to make standard reports and avoid discussions within an audit about definition of: “previous 12 month period”.

#### Pkt. 3.2.1 and appendix II-A

A possibility to modify the calculation of P in the mass balance due to water treatment system and proper measures of the P accumulation should be included in the current revision of the standard. This is also following the VR 212 criteria 3.2.1 for Rakkeby Fishfarm, where the statement from ASC is: *“It is demonstrated that the farm uses the plant lagoon as part of the water treatment system and properly measures the amount of accumulated P in the plant lagoon. Such applications should be recognized in the standard (in the future revision) and thus the VR is granted.”*

Please include this in the current revision of the standard.

#### 3.2.2 and appendix II-B:

Oxygen saturation in the emitted water should be relative to the amount of water oxygen saturation of the water in the stream. Moreover, we suggest that that criterion 3.2.2 only applies for out-flows exceeding 10% of the flow in the receiving water body.

If the out-flow is less than 10% of the water flow in the water body (stream, canal etc.) the oxygen

saturation in the out-flow has an insignificant effect on the oxygenated conditions of the stream. The current criterion can result in unnecessary investment oxygenation systems and use of energy– all together a negative effect for the environment. Low oxygen levels can occur in outflows from Semi-Ras systems where the reduced amount of water used has a residence time of 20 – 50 h in a constructed wetland before entering the recipient / stream. The oxygen saturation in the constructed wetland is intended to be minimal to promote denitrification.

3.3.9:

In contrast to criterion 3.2.2 , criterion 3.3.9 prohibits the use of aerations systems. It does not make sense to prevent farmers from assuring adequate conditions to their fish as well as to the surrounding environment. This will only cause poorer utilization of resources as well as increased negative effects on the surrounding environment. There is no rationale in the standard that explains why this is a criterion.

4.2.6:

Please see the feedback submission form and the specific appendix.