



ASC CERTIFICATION AND ACCREDITATION REQUIREMENTS (ASC CAR) REVIEW V2.3

ASC REQUIREMENTS FOR UNITS OF CERTIFICATION (ASC RUOC) V1.0

Consultation Summary

August 2020



ASC Certification and Accreditation Requirements (ASC CAR) Review v2.3

ASC Requirements for Units of Certification (ASC RUoC) v1.0

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Project Objective

The ASC CAR is the normative document setting the requirements for conformity assessments bodies (CABs) providing certification services against the ASC Standards. This revision has three objectives:

1. Incorporate interpretations and variance requests that have been issued since the previous CAR revision to improve applicability of the ASC
2. Incorporate new requirements to strengthen ASC farm assessments in key areas. These include sampling and testing for antibiotics on certified products and remote auditing. Technical Working Groups supported the development of new requirements in these areas, ensuring they reflect best-practices.
3. Development of a new document including requirements for units of certification linked to the ASC CAR, The ASC RUoC is being created to facilitate better understanding on the applicant/certificate holder side on how to comply with the requirements related to the certification process.

Purpose of consultation

ASC, as a full member of the global membership organisation for credible sustainability standards, ISEAL, is committed to conduct public consultations of new versions of certification normative requirements in order to collect input from relevant interested parties and stakeholders.

The involvement of CABs, producers, NGOs, academia or others with interest and expertise in environmentally and socially responsible aquaculture, helps ensure the impacts of changes and new requirements are understood and the CAR and RUoC provide clear, auditable and appropriate requirements.

Stakeholders are asked to focus on the changes and the new sections of the documents. The comments submitted should provide a rationale regarding the disagreement or modification of a proposed Requirement and/or its wording (see '[Green text](#)' in the following section).



Proposal

The ASC CAR v2.3 and the ASC RUoC unveil a new structure that follows the certification process from application to certification decision and subsequent surveillance and certification updates.

Stakeholders interested in providing their input(s) will find the ASC CAR V2.3 and ASC RUoC marked with different text colours as follows:

- **Black text:** Existing requirements. The only changes are relocation of requirements within the document.
- **Blue text:** Requirements related to the evaluation of social compliance at ASC farms. These requirements were published for public consultation in March-May 2019 and are now in pilot stage for inclusion in the new ASC CAR.
- **Green text:** New requirements (as of August 2020 public consultation), rewording or clarification for the CAR V2.3 (*i.e. comments are invited*).

All ASC CAR v2.2, v2.3 and ASC RUoC (v1.0) requirements are linked in an Excel spreadsheet provided for the public consultation showing the rationales for the proposed changes or for the inclusion of any new requirement. The cells in light green next to these requirements are enabled for comments; including the commenter's rationale for her/his rejection or proposed modification of any specific proposed requirement/wording.

Additionally, ASC will provide recorded webinars and Q&A sessions for CABs, producers and interested parties. Stakeholders can register via the ASC website.

Consultation Questions

In addition to any comments regarding the specific requirements modified or added to the ASC CAR and ASC RUoC, ASC seeks to collect stakeholders' inputs also specifically on the following questions:

1. CABs manage audit times in different ways and based on several factors (size of the operations, number of sites, distance between sites, number of workers to be interviewed, readiness of applicants for certification, etc.) that may affect the audit duration for the same country and species.
 - ➔ *Should ASC prescribe in section 12 Audit Duration, a minimum audit duration detailing minimum times for on-site inspection and document review off and on site?*
 - *If 'yes'/so, what would be your recommendation for such 'minimum times per audit activity'?*



2. The proposed ASC CAR v2.3 removes section 17.7 from ASC CAR v2.2 the categorisation of 'product under assessment' which is the product harvested between the eligibility date and the certification date which may be sold as ASC certified product following the requirements of the [MSC CoC Standard](#) for this product. This product category is not commonly requested by applicants to the certification and has caused integrity risks to the certified product traceability.

- *Do you think that ASC should maintain this product category under the certification scope?*
 - *If so, what is the rationale to maintain this product category?*

3. In section 5, the ASC CAR v2.3 requests the CAB to conduct a due diligence assessment on some environmental and social factors before accepting the applicant to start a certification process.

- *Should ASC accept an applicant with a history of fraud or legal violations?*
- *Should ASC set a timeframe for these organisations to enter in the ASC programme after the closure of the incident?*
- *What is your suggestion for this timeframe? 12 months, 24 months, 36 months?*

4. ASC and the appointed Accreditation Body, as part of their programme assurance duties, conduct visits to certificate holders and provide evidence to CABs on farms compliance.

- *Should the CAB take immediate actions based on the evidence received as it is own evidence? OR*
- *Should ASC set a timeframe for CAB response on the evidence submitted?*

5. Section 16 Remote auditing, Clause 16.3 of the ASC CAR v2.3, excludes the possibility to conduct workers interviews remotely as it is considered that the confidentiality and the interview environment could be affected.

- *Do you agree with this requirement?*
 - *If not, can you recommend or share audit tools or techniques which could assist auditors to conduct workers' interviews remotely*
 - *If remote worker interviews were allowed, should this be restricted to certain low risk conditions (i.e. workers number, country, species)? What circumstances would be acceptable for allowing remote worker interviews?*



6. In March 2020 ASC issued a [policy which allows remote auditing](#) for farms located in countries with Covid-19 travel restrictions. The ASC CAR 2.3 includes similar remote auditing requirements, however these requirements will only be issued in Q1 2021 and effective in Q1 2022.

- Would you support the requirements in Section 16 Remote auditing, becoming effective in early 2021, after public comments have been taken into account?
 - If so, are there any requirements in Section 16 you would not support early implementation for?

7. In exceptional cases there are situations during audits that deserve the stop of the audit. Examples of these situations are: bribery attempts, documents forging, threats.

- Should ASC include requirements to stop an audit and following actions to take?



Next steps

The ASC CAR v2.3 and ASC RUoC v1.0 will be open for public consultation from August 3rd to October 4th 2020.

Interested parties which shared their comments and inputs will receive an answer from ASC acknowledging receipt.

Following the public consultation, ASC will collate all the feedback and prepare a synopsis of feedback received for publication on the ASC website. All the participants will be notified when this publication is made available. ASC will then make any appropriate modifications for review and decision by ASC’s Technical Advisory Group. The decisions and the rationales underpinning them will be made public on the ASC website in early 2021. The document will then be prepared for release in March 2021.

A 12-months implementation timeframe for these new requirements will be provided to CABS and certificate holders. It is thus anticipated that the ASC CAR v 2.3 and ASC RUoC will become effective and mandatory from March 2022 onwards. During this transitory timeframe ASC will provide training to the CABS and workshops to the certificate holders to guide the implementation of requirements.

