



ASC Social Audit Methodology

Summary of Public Consultation Feedback

From March 15th to May 14th 2020 the Aquaculture Stewardship Council opened a public comments period on the Social Auditing Methodology (SAM). The SAM requirements are part of the Certification and Accreditation Requirements and not a document by itself.

A survey with 14 questions was posted online to collect stakeholder inputs (in Annex 1). Also, a more detailed Stakeholder Submission Form was available for comments ([Link](#)). Besides, a series of webinars were conducted to provide some further insights of the methodology. One in-person session was held with Conformity Assessment Bodies (CABs) during the Tripartite meeting (between CABs, ASC appointed accreditation body - ASI, and ASC) in February 2019.

Regarding the online survey, there were 10 total respondents – 3 partial, 6 substantive/complete. One civil society organisation submitted a word document (mainly around the aligned standard). The public consultation counted with the feedback of NGOs, retailers, civil organisations, CABs, producers and anonymous submissions.

Pilots of the SAM together with the Aligned standard (Principle 1 and 3) are being arranged for different settings (farms, processors) in different countries. As soon as the pilots are completed, feedback from the pilots (from recipients - farms and processors - and CABs) will be incorporated into this summary and responses to both stakeholders comments and pilot feedback will be provided.

Highlights

Most understand well or reasonably the proposed social audit methodology and changes (with some questions) Q3.

No one found the proposed SAM and tools difficult to understand (Q4)

The CAR is seen as covering all of the important elements (Q5). Concerns include extensive (expensive and not accessible, particularly for smaller actors)

Most agree that the new category of critical NC is important and reasonable/feasible to implement. (Q6) Concerns include auditors interpretations of evidence, understanding of legal context.

Most agreed that the Social Risk Assessment Calculator is comprehensive (Q7)

Most felt that the Social Risk Assessment Calculator needs improvement in accounting for existing standards (Q8) – no concrete suggestions

Mixed in how the Social Risk Assessment Calculator balances integrity and risk – general agreement that the factors are comprehensive, weighted and will have impact. But some disagreeing on specific points (see details below). (Q9)

Little agreement on low risk scenarios. But generally do not feel desk based/remote audits are sufficient (Q10)

- Most do not feel a desk based audit is sufficient



- Split on whether trained environmental auditors are qualified
- Most feel that remote audits will weaken the rigor

Almost all feel the SAM is highly relevant and costs outweigh the incentives (Q11)

ALL felt the SAM and revised CAR is already part of their business or moderate effort. (Q12)

Opportunities/incentives- need more demand, streamline and align (Q13)

Most felt the desk review will require some additional time, a few thought significant

Split regarding onsite audit – between additional and “hard to say” (Q14)

Bottom line – overall support and recognised relevance and importance. Concerns are around balancing integrity and not overburdening an already complex system/assurance process.

More detailed questions/feedback – with check box- for ASC to review (Direct Quotes)

CAR

- For the interviews of subcontractors working on-site but not present, will it be according to CAR v2.2 to perform interviews at the subcontractors premises?
- How will ASC support smallholders in preparing? (*overarching concern*)
- How will auditors gather community information?
- CAR has become very extensive. I hope this can be done simpler for sites/companies that have shown good compliance to social standard in the past.

Critical NC

- Social auditors are often not Norwegian, and it is not clear to me if they can decide what is a critical NC. Workers are highly protected under Norwegian legislation, so I feel this gives an unfamiliar auditor a lot of "power".
- It is unclear of the timeline of what would happen after a critical NC is called
- There will be a need to state it to be mandatory for auditor to inform relevant authorities if he/she has obtained objective evidence that show that workers lives are at risk.
- I am not sure why the ASC developed this new level of NC? Would it have not made more sense to have a major or minor NC in the area of Social Requirements?
- If ASC does introduce ‘critical’ non-conformities, we strongly urge the ASC to treat ‘critical indicators’ as just that - critical. Farms that fail to conform with critical indicators should dis-entitle them from certification; or immediate certificate revocation for when critical non-conformities are raised during the validity of certificate.



Social Risk Assessment Calculator

Balancing Risk

- It is virtually impossible to have unannounced audits.
- It would be appropriate to take into the frequency of health and safety inspections made by authorities in the country in question. Many countries perform risk based inspections which leave problems with health and safety in small fields of work with no accidents reported unrecognised.

Low risk Scenarios

- Desk based and remote audits miss a lot of essential details, regardless of risk rating.
- Should only be if there were no major NC's in previous audit
- It might be appropriate to perform desk based audits on surveillance audits (SA1 and/or SA2) in re-certification cycles. But it will weaken the rigor immensely if social audits at SA1 and/or SA2 during the first certification cycle is done desk based as there might be issues with compliance that are not revealed during the initial audit no matter the amount of effort put in by auditor.
- As we operate in a low risk region this seems a bit too much, but I am sure it's a good idea in high risk areas.

SAM – Opportunities/incentives

- I think there is a good opportunity to streamline and strengthen the ASC process.
- Always Nice to have a Third party evaluation of our current status
- It would be a greater incentive if there was a higher market demand for ASC products in North America
- The update of the 7 Principles in the current standards to the more efficiently model which group the indicators into 3 Principles is very beneficial and will make it more user-friendly for sites.
- It's important to align with other Certification schemes that cover social requirements

Other

There are some concerns about the implementation of the new requirements for smallholders, and different actor of the supply chain, and not only at the farm level as it has been until today.

Also, some respondents presented concerns about the requirements on cultural and local knowledge for social auditors, as it can be challenging for some regions/ countries to find qualified auditors.



Recommended considerations

- Clear communication documents/ guidance
- Auditor training – specifically on legal context, community data. Consider in Pilots
- Guidance and support for smallholders
- Some specific comments/questions in details above

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Annex 1 – SAM Online Survey



ASC Social Auditing Methodology - Stakeholder Input

Welcome to the ASC Social Auditing Methodology Public Consultation

The Aquaculture Stewardship Council's (ASC) mission is to transform aquaculture towards environmental sustainability and social responsibility using efficient market mechanisms that create value across the chain. Social responsibility has been a key component of ASC since its inception.

ASC has developed a systematic approach towards auditing social issues to ensure harmonious application of ASC social requirements in aquaculture farms, processing plants, and feed mills. Several key aspects of the approach taken in designing the methodology include:

- Covering feed mills, farms and processors
- Integration into, and builds upon, the existing Certification and Accreditation Requirements (CAR)
- Based on the new proposed aligned standard
- Taking into account other social compliance and certification schemes for synergies and efficiencies
- Balancing robust and cost-efficient system
- Risk-based.

Your input is being requested on the revised ASC Certification and Accreditation Requirements (CAR) version 2.2 and the related Risk Calculator tool.

FIRST, please read the overview Narrative, along with the CAR V2.2 and Excel Risk Calculator, available [HERE](#).

NEXT, please complete this online general survey. More detailed comments can be provided with the Public Consultation feedback form [AVAILABLE HERE](#)).

This survey contains 15 questions and should take about 8 minutes to complete. This consultation forms part of the generic program review and the outcomes will be included in revised ASC's Certification and Accreditation Requirements (CAR) which are due for release later 2019.

All feedback will be made public after the consultation closes. You may contact the ASC Programme Assurance Team at standards@asc-aqua.org directly if you have any questions, comments or suggestions.

*** 1. Contact Information**

Name

Organisation

Country

Email address

*** 2. I am responding as...**



ASC Social Auditing Methodology - Stakeholder Input

Overall Understanding Narrative and Technical Documents

For the following questions, please refer to the Narrative and revised CAR v.2.2, available on the ASC website [HERE](#)

* 3. Can you follow the proposed social audit methodology and changes?

- Yes- understand very well the documents and proposed changes
- Partially - reasonably understand the different documents but have some questions
- No - very difficult to understand the documents
- Comment or Other (please specify)



ASC Social Auditing Methodology - Stakeholder Input

Coverage and Gaps

* 4. It is difficult to understand the documents and tool because (check all that apply)

- Language is too technical
- Not enough knowledge around auditing
- Not enough knowledge around social issues
- Other (please specify)

* 5. Referring to the CAR - does it cover all of the important or expected elements from your perspective?

- Yes - very comprehensive
- Partially - good, but could be improved (see comment box)
- No- key aspects missing which are.....

* 6. Referring to the CAR - we have introduced a new category of Critical Non-conformity.

	Agree	Disagree	Can't say one way or another
Agree with this new category - very important!	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
This new category of critical N/C is reasonable and feasible to implement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

I am concerned about introducing this new category of critical N/C because.....

* 7. Referring to the Excel tool Risk Calculator - does it cover all of the major or key risk areas from your perspective?

- Yes very comprehensive
- Partially - good, but could be improved (see comment box)
- No- key aspects missing which are.....

* 8. Referring to the Excel tool Risk Calculator - has it effectively accounted for existing relevant standard and indices (to lower costs, avoid duplication and recognize existing efforts)?

- Yes very comprehensive
- Partially - good, could be improved (see comment box)
- No- other schemes or approaches that should be considered as proxies for recognition or equivalency include.....



ASC Social Auditing Methodology - Stakeholder Input

Risk: Managing Assurance Integrity and Operational Risk

For the following questions, please refer to the Excel tool Risk CalculatorLINK

* 9. Referring to the Excel tool Risk Calculator - does it effectively balance risk - managing assurance integrity and operational risks?

	Disagree strongly	Disagree	Neither agree or disagree	Agree	Strongly agree
Risk factors are comprehensive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Risk factors are weighted appropriately	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Risk factors will have the right impact on audit intensity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

any clarifications or additional comments?

* 10. In **low risk** scenarios (low risk in ALL categories including no Non-conformities from previous audit) how do you perceive the following?

	Disagree strongly	Disagree	Neither agree or disagree	Agree	Strongly agree
Desk based audit is sufficient for subsequent surveillance audits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental auditors trained on ASC social auditing can cover the social part sufficiently	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Remote audits will not weaken the rigor	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

any clarifications or additional comments?



ASC Social Auditing Methodology - Stakeholder Input

Feasibility

How do you perceive the demand for this approach, costs and incentives?

* 11. How do you perceive the need for this methodology?

- Highly relevant - being demanded by markets
- Not that relevant
- Costs outweigh the incentives
- Other (please specify)

* 12. Based on your review of the CAR and aligned standard (FIRST TIME THE STANDARD IS MENTIONED) how do you perceive your ability to meet the proposed requirements?

- Relatively easy - it is already part of our daily business
- Moderate- it will require some investments and changes
- Hard- still a long way to go with a lot of investment

Please add any clarification or further comments

* 13. What do you think are the opportunities, incentives or payoff?

* 14. How do you think the new approach will affect the audit process?

	About the same amount of time and effort using the tools	Some additional time and effort but worth it	Significant additional time	Really hard to say at this stage
Desk review: additional documentation and planning	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On site audit: new methodology, interviews	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any rough estimate of what you think this will require in terms of time and effort?

15. Thank you for your time and please let us know if you have any comments, suggestions or questions