

ASC Feed Certification and Accreditation Requirements (CAR) and Requirements for Unit of Certification (RUoC)

Frequently Asked Questions (FAQs)

September 1 - October 31, 2021 Public Consultation



ASC Feed Certification and Accreditation Requirements (CAR) v0.1
ASC Feed Certification Requirements for Unit of Certification (RUoC) v0.1
Public Consultation Summary
September 2021



Contact Information:
Aquaculture Stewardship Council
Daalseplein 101, 3511 SX Utrecht
The Netherlands

+31 30 239 31 10

www.asc-aqua.org

ASC Feed CAR and RUoC – FAQs

1. What is the Segregation Production Model?

When using the Segregation Production Model, the outgoing product (or feed), is made up of Eligible Ingredients as per Annex 5 of the Feed Standard. For this reason, a segregation and traceability system within the facility is needed to identify and keep Eligible Ingredients segregated from ingredients which are not classified as eligible under ASC requirements but that may also be brought on site by the feed mill.

The feed mill will be required to have sufficient capacity and processes in place to always ensure segregation of the physical product while under their control.

2. What is Mass Balance Production model?

The Mass Balance Production Model is a system for administratively accounting for the inputs of Eligible Ingredients from approved suppliers and outputs of ASC product. It is NOT linked to the physical product and there is no physical traceability requirement.

So, when using the mass balance model, unlike the segregation model, the product (or feed) is not necessarily made up exclusively of eligible ingredients, instead the feed mill will have an Ingredient Accounting System. The purpose of the Ingredient Accounting System is to capture input volume of incoming eligible ingredients and deduction (or output) of ASC feed.

It allows the mixing of Eligible Ingredients and Non-Eligible Ingredients at any stage in the feed production process, provided overall quantities are monitored via the Ingredient Accounting System. This results in a claim on a part of the output (which is ASC Product), proportional to the input of Eligible Ingredients.

In simple terms – the feed mill can only make an ASC claim on a volume of finished product based on the same volume of eligible ingredients purchased in a given timeframe.

3. What is the Ingredient Accounting System used for?

The purpose of the Ingredient Accounting System is to capture input volume of incoming Eligible Ingredients and deduction (or output) of ASC feed. It is not linked to the physical product but rather the volumes of Eligible Ingredients.

4. If a feed mill produces ASC product under the Segregation Model only, do they need to have an Ingredient Accounting System?

No. If a feed mill sells ASC product produced under the Segregation Model and not the Mass Balance Model, then they do not need to have an Ingredient Accounting System.

5. In the Mass Balance Production Model, the feed mill is not permitted to use the ASC Logo. How can ASC product be identified without using the ASC logo?

Indicator 3.3.1 of the feed Standard states:

The UoC shall identify product which is sold under the mass balance model by using the allowable feed claim, including the model applied (i.e. mass balance). The ASC logo shall not be used.

This means that although the feed mill cannot use the ASC logo, they can identify the product via the allowable feed claim. The product can also be identified as ASC via other transaction documentation e.g.: sales / invoicing documents. 6. Would an acceptable claim be 'final volume of X% meets ASC mass balance requirements?

No. The way the mass balance model is structured, it does not require a known % of eligible ingredients to be blended within a batch.

7. Why is ASC allowing the Mass Balance Model instead of allowing only a Segregation Model where the feed contains only eligible ingredients?

The ASC realises there will not be sufficient volume of eligible ingredients to maintain a fully segregated supply for ASC feed. Until such time and as a first step ASC allows the use of the Mass Balance Production Model.

Mass Balance is an important step to enable a shift towards a segregated supply chain. The Mass Balance Production Model can be used to allow a gradual or phased increase in the use of an eligible only ingredient supply chain (meaning a phased decrease in use of non-eligible ingredients).

Future versions of the feed standard may move away from mass balance.

8. In reality, an individual bag of ASC feed produced under the Mass Balance Production Model may physically contain no Eligible Ingredients.

Yes, this is true. See response to question above.

9. I supply ASC Aqua Feed and Non-ASC Aqua feed to multiple customers. Do I have to keep the ingredients for ASC and Non-ASC ingredients separate?

It depends on the Production Model used to produce the ASC feed product.

Under the ASC Mass Balance Production Model, you do not need to maintain physical separation of ingredients. The Ingredient Accounting System is used to capture the volume incoming eligible ingredients. You can mix eligible and non-eligible ingredients so long as overall volumes are

monitored. You can then make a (Mass Balance) claim on outgoing ASC product based on the volume of incoming eligible ingredients.

However, if you are producing ASC product under the Segregation Production Model, you will need to ensure physical segregation of eligible ingredients and non-eligible ingredients of the same type.

Eligible ingredients can be used in ASC and Non-ASC feed product so long as they remain segregated from non-eligible ingredients.

10. How do we treat and tolerate cross-contamination under the Segregation Production Model?

In this context an example of cross contamination would be the mixing of non-eligible ingredients into a product produced under the Segregation Model.

Within the RUoC, Section 17 relates to Non-Conforming Product and requires the UoC to have a documented procedure for managing such circumstances. This includes having defined responsibilities for decision making, actions to take in the event of detecting non-conforming product (e.g. downgrade to Mass Balance product) and notification requirements (e.g. inform CAB & Customer).

11. How to apply Mass Balance Production Model in multisite certification?

Please refer to section 4.4 Shared Accounting System. The Shared Accounting System is a system in which the Client can apply the requirements of the Ingredient Accounting System over a number of their ASC certified production sites using one single accounting system. This means inputs of ASC Eligible Volume can be shared across multiple physical sites.

There are some criteria that must be met in order to use this, for example:

- 4.4.1.1 be owned and operated by the Client,
- 4.4.1.2 be certified individually or as a multi-site under the ASC Feed Standard,
- 4.4.1.3 be certified by the same CAB,
- 4.4.1.4 be located within the same country,
- 4.4.1.5 be listed (name, location) in the Shared Accounting System,
- 4.4.1.6 share or use the same ingredient manufacturers and raw material approval system,
- 4.4.1.7 have authority to enter into and deduct eligible volume from the Shared Accounting System,
- 4.4.1.8 acknowledge non-conformities raised against the Shared Accounting System of any one participating site may have an impact on eligible volume for all sites involved in the Shared Accounting System.

12. In circumstances where the mill does not sell the finished product to ASC farm directly but through an agent or broker, does the agent have to have a CoC audit or any requirement to ensure the whole chain of traceability?

Currently there are no CoC requirements for traders or brokers. We have addressed this topic in the RUoC draft requirements in section 21:

21.9. In cases where the Client sells ASC product to an entity other than directly to an ASC certified farm (e.g. trader or distributor), the Client:

21.9.1. Shall pack ASC product with tamper proof & traceable labels or seals (i.e. a label or seal with a traceable identification which is destroyed when the container or bag is opened).

21.9.2. Shall have a mechanism to prevent the entity from misusing the client's name or re-use of the client's packaging.

21.9.3. Should obtain written commitment from the entity that they will not permit misuse or tampering of the ASC product while in their ownership

We are also discussing this further internally to see how this can be strengthened for example through the development of a Feed CoC standard.

13. Who can conduct the subnational/sectoral assessment and the ingredient manufacturer assessments as described in 'Pathways to determine low risk' in Annex 3 of the feed standard?

The RUoC document details the competency requirements for individuals conducting the due diligence processes. This can be a multi-disciplinary team so, as long as all criteria are collective met, the team are considered competent.

Evidence of competency is required to be maintained for internal and external personnel doing the assessments.

To define how to do the assessment does not sit within the assurance documents, therefore it does not prescribe *how* the feed mill is to conduct the assessments, but it requires that the process is documented.

Guidance documents currently under development will better describe how the subnational/sectoral assessment and the ingredient manufacturer assessments will be carried out.

14. What is the timeline for the ASC Feed CAR and RUoC release?

The proposal is open for public consultation from 1st September to the 31st October 2021. Requirements will be revised and improved as appropriate based on feedback from consultation. The revised requirements will be submitted to the ASC Technical Advisory Group for approval in early 2022. Pending approval, the ASC Feed CAR and RUoC final version will be released at the end of the 1st quarter of 2022 at which time the CAB accreditation process can begin, and feed mills can begin to implement the RUoC document requirements.

A 6-month implementation timeframe for these new requirements will be provided to CAB's and Applicant feed mills.

15. When can audits be conducted against the ASC Feed Standard?

The Feed CAR and RUoC will become effective from end Q3 / Start Q4 2022 at which time, audits can be conducted.

End - Page left intentionally blank