



# ASC Fish Welfare Public Consultation Summary Report

September – October 2021





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## Acronyms

Acronym	Definition
<b>ASC</b>	Aquaculture Stewardship Council
<b>NGO</b>	Non-Governmental Organisation
<b>OIE</b>	World Organisation for Animal Health
<b>PC</b>	Public Consultation
<b>TAG</b>	Technical Advisory Group
<b>TWG</b>	Technical Working Group

*This report is part of an ongoing policy development.*

*The views and opinions reported from stakeholders will inform the final outcomes but do not necessarily reflect the official policy or position of the Aquaculture Stewardship Council.*

## 1 Background

The ASC Fish Welfare project aims to define, through standard indicators, key impacts of aquaculture on farmed aquatic animal welfare and associated best practices that will be required to meet ASC's Farm Standard.

This Public Consultation (PC) followed an initial consultation on the Terms of Reference for this work in 2019. For the September 2021 PC the objective was to seek input from stakeholders to inform further development of the Fish Welfare requirements for the forthcoming ASC Farm Standard, specifically to:

1. Collect feedback on the practical impact of proposals on producers, primary processors, and auditors.
2. Collect feedback from other key stakeholder groups on the conceptual approach developed by the Technical Working Group (TWG). The TWG is a group of external experts, representing different stakeholder backgrounds in fish welfare supporting ASC's Technical Advisory Group (TAG) by developing recommendations for standards content.

To improve the rigour of the process, ASC also aimed to improve the balance of stakeholder representation and engagement through consultation, and obtain early insights into auditability of proposals.

Consultations are also important ways to raise awareness of changes that are likely to affect stakeholders in coming years and provide an opportunity to engage more with programme users and build understanding about the ASC Programme and its impact.

### 1.1 Approach

ASC is committed to transparency, aiming to ensure stakeholders can understand the rationale for decisions taken on standards content. In addition to this summary of feedback, ASC will publish the full consultation results. To ensure stakeholders were able to provide full and open feedback, ASC presented a detailed survey, allowing respondents to confirm whether they wished their name/organisation to be published along with their comments. ASC does not accept anonymous submissions. However, for the targeted surveys as presented below, ASC included questions on which responses will be presented in an aggregated and summarised form, as answers may include business sensitive or strategic information.

- ASC provided several ways for stakeholders to provide feedback to the consultation:
- A general feedback survey on the recommended approach developed by the TWG
- A targeted producer survey
- A targeted brand & retail survey
- One on one interviews with ASC staff members, with the feedback processed through the surveys or via email

## 2 Participation

In total, 94 respondents provided feedback as part of the consultation. Respondents vary from individuals to large organisations. Stakeholders representing varied regions and sectors participated in the consultation. ASC works towards balancing participation across stakeholder sectors and does not weight feedback dependent on quantity per group. Hence, the tables below serve informative purposes only.

The figures below show the total submissions across the three different surveys for each stakeholder group.

Stakeholder Group	Number of Responses	Share
<b>Producer (Farm)</b>	36	38%
<b>NGO</b>	17	18%
<b>Academia</b>	3	3%
<b>Processor</b>	3	3%
<b>Retail</b>	27	29%
<b>Other (supplier, consultant, tech company, genetic company, consumer)</b>	8	9%
<b>TOTAL</b>	<b>94</b>	<b>100%</b>

Table 1: Number and percentage of individual respondents per stakeholder group

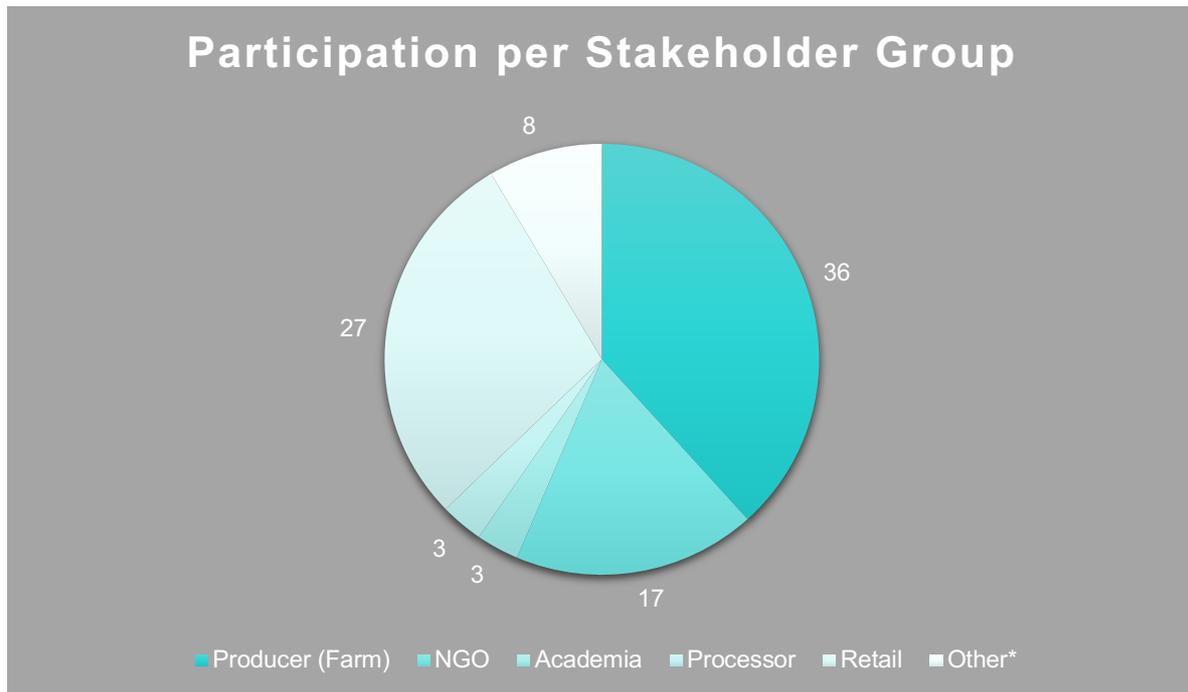


Chart 1: Number and percentage of individual respondents per stakeholder group.  
 \* Consultant, consumer, genetic company, supplier, tech company

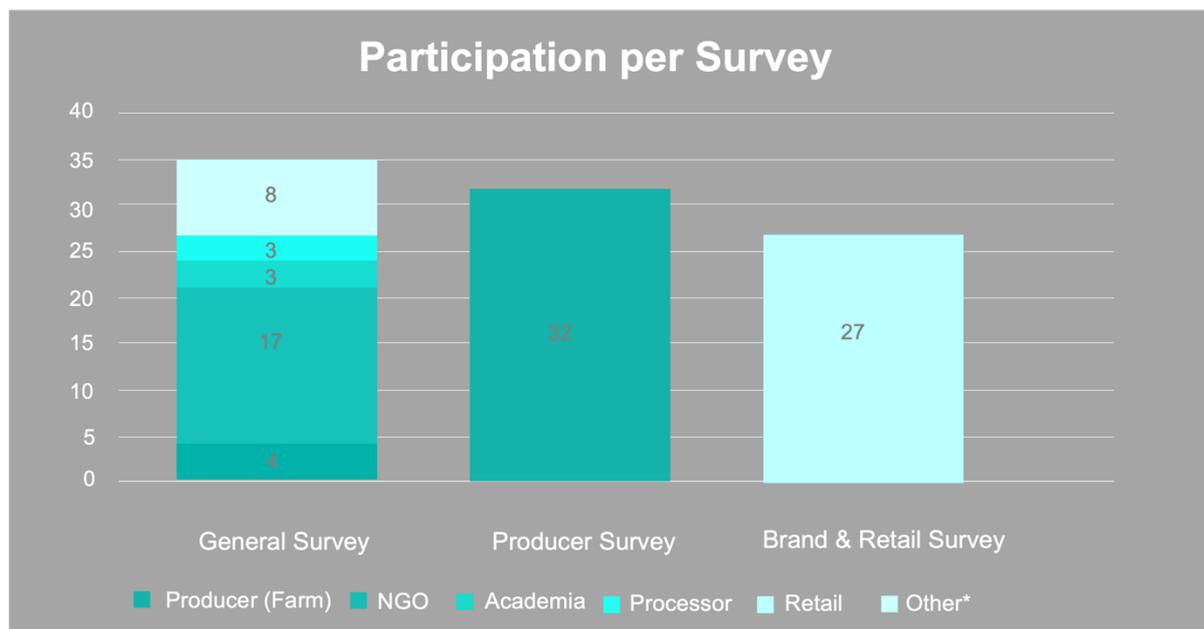


Chart 2: Stakeholder representation among the different surveys  
 \* Consultant, consumer, genetic company, supplier, tech company

## 2.1 Progress against participation goals

A main objective of this consultation was to obtain technical and practical feedback from producers. ASC developed targets for feedback from producers currently in the ASC programme based on representation from priority species, regions, and aquaculture production systems. This resulted in a target of 21 producers, with a minimum of respondents for each species and region, ensuring representation across ASC’s different production settings. The NGO target was at least 10 respondents, including the major animal welfare NGOs. For the retail survey, the main aim was to have representation of the retailers that already consider fish welfare in their strategies, as well as the inclusion of respondents in regions where fish welfare is likely to be of lower priority in retail.

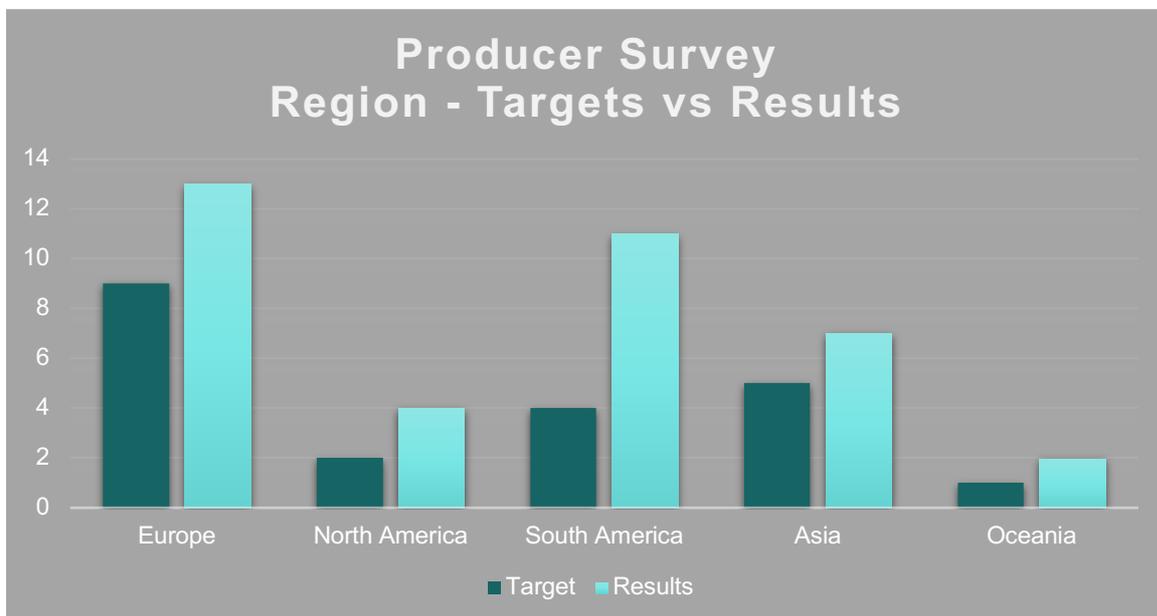


Chart 3: Regional representation of results vs targets of the producer survey

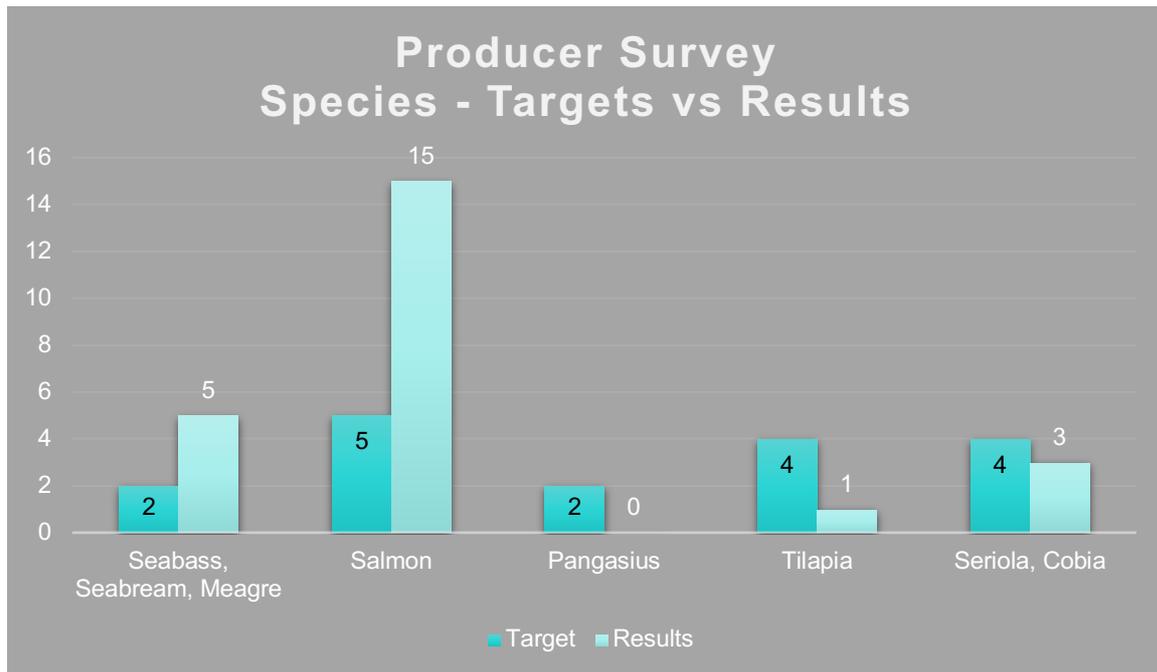


Chart 4: Species representation of results vs targets of the producer survey: Participation targets were met for seabass, seabream, meagre and salmon, and were not met for the rest of the species (pangasius, tilapia, seriola and cobia).

## 2.2 Breakdown of producer feedback by species and region

Species	Regions	Subtotal	TOTAL*
<b>Freshwater trout</b>	Asia	1	3
	Europe	1	
	North America	1	
<b>Seabass, Seabream, Meagre</b>	Asia	3	5
	Europe	2	
<b>Salmon</b>	North America	4	15
	South America	6	
	Europe	7	
	Oceania	1	

Species	Regions	Subtotal	TOTAL *
<b>Seriola, Cobia</b>	Europe	3	3
<b>Shrimp</b>	Asia	4	5
	South America	1	
<b>Tilapia</b>	South America	1	1
<b>Tropical Marine Finfish</b>	Asia	1	1

Table 2: Number of respondents per species and region

\* Totals may not add up as some companies operate in multiple regions

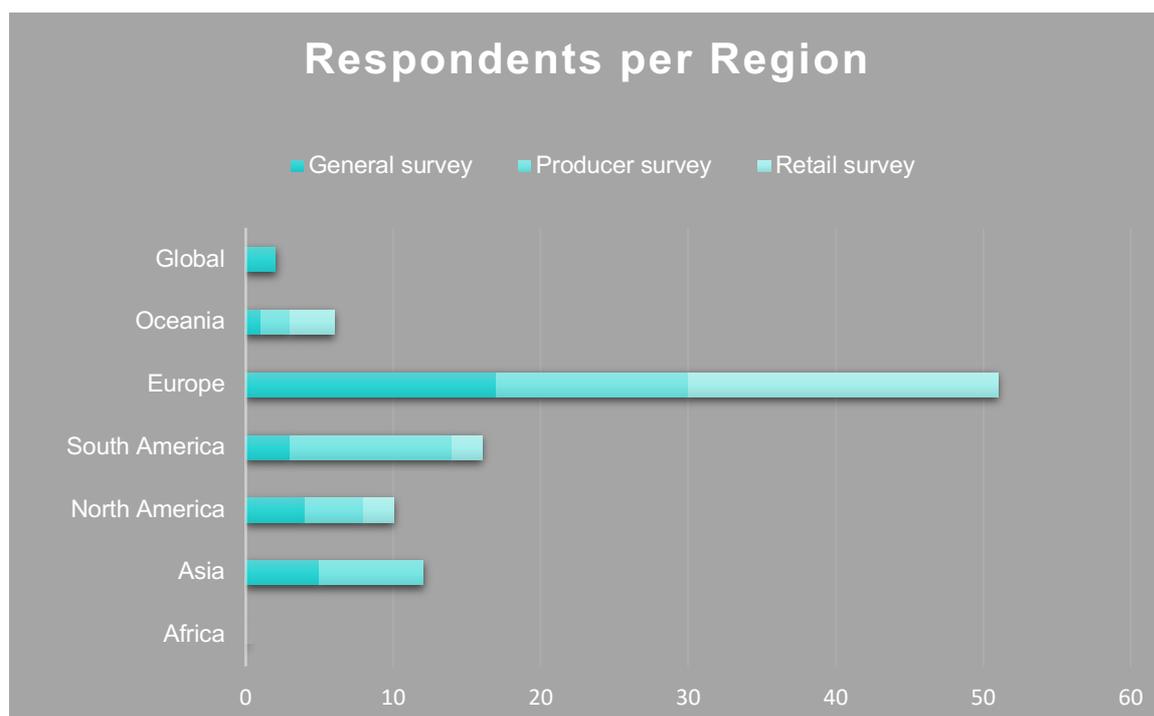


Chart 5: Respondents across continents

### 3 Summary of feedback

ASC received good feedback in terms of both quantity as quality. All stakeholder groups and regional targets were met, but not all targets on species representations were achieved. The species on which ASC is lacking feedback are pangasius and tilapia. ASC has currently

strengthened the Technical Working Group with a tilapia producer (Regal Springs) and is part of a research consortium on welfare aspects of pangasius production in Vietnam. To ensure that the species-specific aspects of these production aspects are considered, ASC will put additional efforts in targeting these stakeholder groups during the September 2022 consultation round.

### 3.1 Key themes

In the following tables, summaries of results from the three surveys conducted by ASC are presented.

Theme	General Feedback Survey	Targeted Producer Survey	Targeted Brand and Retail Survey	ASC Response & Next Steps
<b>Scope</b>	<p>The majority of respondents (~75%) felt that there were welfare issues missing from the overview shared by ASC. Most cited missing issues included:</p> <ul style="list-style-type: none"> <li>• Transport</li> <li>• Breeding/genetics</li> <li>• Mutilations.</li> </ul> <p>ASC also received many examples of issues that are already covered elsewhere in the ASC Farm Standard.</p>	<p>88% of producers stated that they already have processes in place to improve animal welfare. Of the examples provided, water quality, fish health and stocking densities were welfare aspects that are already monitored by all respondents. For all of the provided options, at least half of the respondents are already monitoring them. 88.5% of the producers could identify opportunities to improve welfare that would also result in a production gain. 56% of producers recognised conflicts</p>	<p>71% of retailer respondents stated that fish welfare is currently addressed in their company policies. All these respondents were European. The welfare issue that was mentioned most frequently as a priority was stocking densities. 60% of retailers stated that compliance with fish welfare standards would not justify a difference in product price. All these respondents were Europeans, except for two that operated both in Europe and Oceania.</p>	<p>Many of the welfare issues reported as missing in the stakeholder feedback are already part of existing standard content and/or part of the project scope. ASC will share the comprehensive set of health &amp; welfare indicators during September 2022 and provide more clarity on linkage with existing standard content. The feedback on the other missing issues will be analysed and presented to the Technical Working Group (TWG) for reconsideration of inclusion / prioritisation of welfare issues. The TWG will revise the opportunities for</p>

Theme	General Feedback Survey	Targeted Producer Survey	Targeted Brand and Retail Survey	ASC Response & Next Steps
		between welfare conditions and production outcomes.		welfare improvements highlighted by producers, and make sure these are taken into account when developing the standard.
<b>Management &amp; Training</b>	The majority of respondents (~70%) stated that all staff including management should receive fish welfare training. 24% stated that it is sufficient for decision makers and staff handling fish to complete fish welfare training.	Two-thirds of respondents already carry out some form of animal welfare risk assessment. 90% of producers stated their staff are receiving fish welfare training. This involves mostly staff on-site and the majority provide annual training.	The targeted brand & retail survey did not contain specific questions on this item.	The TWG will analyse the feedback and will develop a proposal on training.
<b>Water Quality</b>	Few respondents specified their comments on level of species and/or system. Some references were provided for ASC to review. Dissolved oxygen and temperature were the parameters mentioned frequently as important to consider.	Producers shared their practices which will be categorised according to species/culture system to inform the TWG.	The targeted brand & retail survey did not contain specific questions on this item.	The TWG will study the feedback provided in terms of parameters to monitor and currently being monitored. Taking into account fish health and welfare considerations the TWG will develop a list of parameters that require monitoring.
<b>Environmental Enrichment</b>	Almost an equal amount of respondents agreed/disagreed with	52% of producers identified themselves as familiar with	Almost no respondents were aware of whether their suppliers were	The TWG will review its recommendation taking the feedback from stakeholders

Theme	General Feedback Survey	Targeted Producer Survey	Targeted Brand and Retail Survey	ASC Response & Next Steps
	<p>the proposal to postpone addressing environmental enrichment.</p>	<p>environmental enrichment. Eight of the respondents are already applying some type of environmental enrichment.</p>	<p>already applying environmental enrichment and the majority agreed on the proposal to postpone implementing a requirement on enrichment.</p>	<p>into account. ASC will develop an approach for the initial version of the standard requirements on how to collect information to inform future revisions.</p>
<p><b>Stocking Density</b></p>	<p>Comments on the suggested approach had a high level of variation. Some respondents strongly opposed not setting strict numerical limits. There was agreement between the respondents that optimum densities are a dynamic issue, depending on system, site, species and life-stage.</p>	<p>Producers shared their common practices which will be categorised according to species/culture system to inform the TWG.</p>	<p>The feedback on the current ASC proposal was varied but many retailers highlighted that clear numerical limits would be preferred in terms of simplicity with regards to communication to the consumer.</p>	<p>The TWG will analyse the feedback on a species- and system-specific basis to update the indicator proposal.</p>
<p><b>Stunning &amp; Slaughter</b></p>	<p>Comments on the recommended phased approach highlighted that more clarity is required on the goal to make stunning before slaughter required. A recurring comment was that species/industries for which best practices already exist, should not be part of the phased approach. Several respondents mentioned the World Organisation for</p>	<p>Slaughter takes place in an off-site processing unit for 53% of the respondents. For 37% of respondents slaughter is carried out on-site. For 10% of the respondents slaughter is carried out both off and on-site. Producers also provided feedback on which stunning method they are currently applying</p>	<p>The majority of retailers saw no missing issues from the list of practices that should be banned immediately.</p>	<p>The TWG will analyse the feedback on a species- and system-specific basis to update the indicator proposal.</p>

Theme	General Feedback Survey	Targeted Producer Survey	Targeted Brand and Retail Survey	ASC Response & Next Steps
	<p>Animal Health (OIE) guidelines on stunning and slaughter for ASC to use as guidance. 50% of respondents reported that the list of practices to be banned immediately should be expanded with additional practices. The use of ice slurry was mentioned most frequently.</p>	<p>and what potential barriers they are facing in improving welfare in the slaughtering process. These outcomes will be categorised according to species/culture system to inform the TWG.</p>		

### 3.2 Full feedback

Full feedback is being published separately in three documents: *Public Consultation - Fish Welfare - General online survey*, *Public Consultation - Fish Welfare – Producer online survey*, and *Public Consultation - Fish Welfare - Retail and Brands online survey*, which provides an overview of the survey questions and participants responses.

### 3.3 Next steps

The feedback received will be shared with the Fish Welfare TWG for them to evaluate in refining existing proposals and developing further standard content. The revised proposals will be shared with the ASC Technical Advisory Group (TAG) for approval ahead of another public consultation in September 2022 where the full proposed standard requirements will be included.