



ASC Farm Standard

Public Consultation V Summary Report

March – April 2022



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Acronyms

Acronym	Definition
ADD	Acoustic Deterrent Devices
ASC	Aquaculture Stewardship Council
CAB	Conformity Assessment Body
CAR	Certification and Accreditation Requirements
EEMP	Environmental Enhancement and Mitigation Programme
ETP	Endangered, Threatened and Protected
EQS	Environmental Quality Standard
FFDR	Forage Fish Dependency Ratio
FPIC	Free, Prior and Informed Consent
GHG	Greenhouse Gas
HCV	High Conservation Value
ISEAL	International Social and Environmental Accreditation and Labelling Alliance
NGO	Non-Governmental Organisation
PA	Protected Areas
PC	Public Consultation
RAS	Recirculating Aquaculture System
RMF	Risk Management Framework
SBTi	Science Based Target Initiative
SUP	Single-Use Plastics
TAG	Technical Advisory Group
TG	Technical Group
TWG	Technical Working Group
UoA	Unit of Assessment
UoC	Unit of Certification

This report refers to 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 objective of the ASC Farm Standard alignment process is to develop a single standard applicable to all farmed seafood species currently in scope of ASC standards. The ASC Farm Standard will have production-system specific criteria and species-specific metrics where necessary. It will consist of three principles setting effective and credible requirements. The public consultation that took place from March to April 2022 included Principle 1 and Principle 3 requirements, covering legal and social indicators as well as Principle 2 Criteria on environmental indicators, excluding the Fish Welfare elements. Fish Welfare proposals were open for consultation from [September to October 2021](#). Further topic specific consultations will be completed in the period from September to October 2022 and a final consultation on the complete standard is scheduled for September 2023. On-farm pilots and impact testing will also take place ahead of the final consultation. A decision on whether to adopt the ASC Farm Standard will be made in March 2024.

Alignment Process – ASC Farm Standard

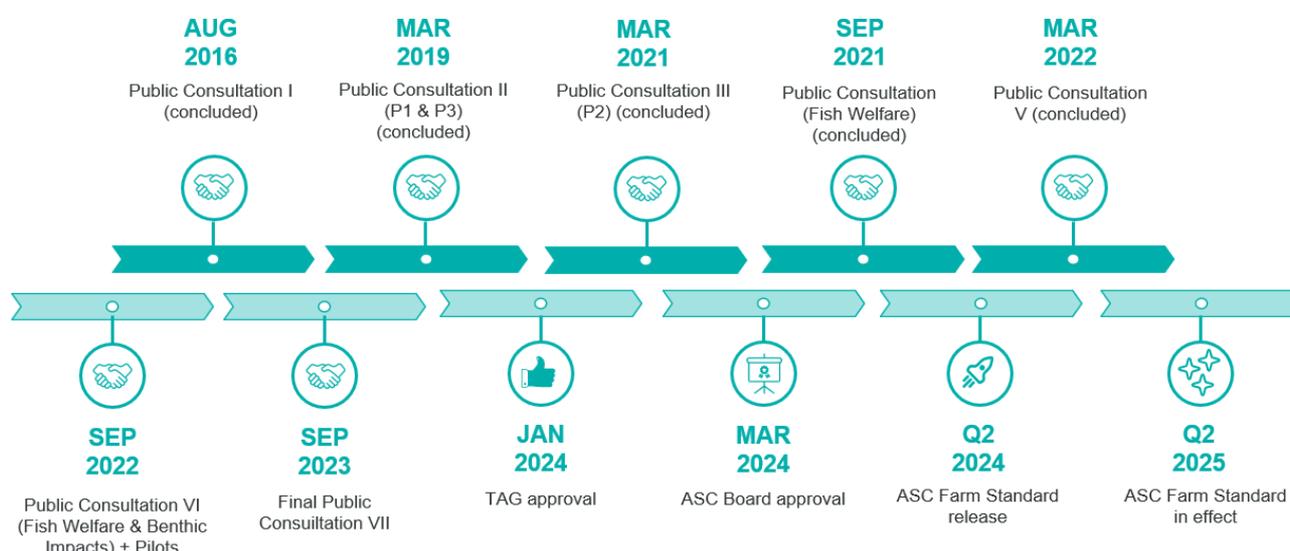


Figure 1: ASC Farm Standard timeline

During the development stage of the draft of the ASC Farm Standard, various Technical Working Groups (TWG) were formed. The TWGs comprise experts from different stakeholder sectors but with specific expertise in the subject matter. Recommendations from these TWGs were incorporated into the draft of the standard which was released for public consultation for 60 days in March 2022.

1.1 Objectives

The objectives of this public consultation were to:

- Build consensus that the proposed ASC Farm Standard addresses aquaculture's key sustainability issues in line with stakeholders' expectations
- Understand the impacts of proposals on specific stakeholder groups
- Gain insights from Conformity Assessment Bodies (CABs) on whether the ASC Farm Standard is auditable
- Gain insights on whether the ASC Farm Standard is applicable across all production systems, regions, species and farm sizes

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

1.2 Approach

ASC is committed to transparency, aiming to ensure stakeholders can understand the rationale for decisions on standards' content. Chapter 3 contains a summary of feedback

including responses from ASC on key themes raised in the feedback received. ASC has also published [all comments received](#). To ensure stakeholders provide full and open feedback, ASC does not attribute published responses. Names and organisations of those providing feedback are published separately and annexed to this document. ASC does not accept anonymous submissions.

ASC collected feedback in four ways:

- Online survey in English, French, German, Japanese, Spanish, and Vietnamese;
- Online public workshops and hybrid workshops with regional and international partners;
- Direct 1:1 meetings and phone calls;
- Emails with written feedback.

ASC also employed several methods to engage stakeholders and increase accessibility:

- Offline consultation survey pdf version with all questions in English, French, German, Japanese, Spanish and Vietnamese;
- Online launch event on 1 March 2022 including Q&A session;
- Direct engagement via ASC Newsletters (sent out to 4,932 subscribers) / email;
- Social media communication with links to ASC webpage (LinkedIn and Twitter);
- The draft of the ASC Farm Standard was translated into Chinese (simplified), English, Japanese, Spanish, Vietnamese;
- Slides and short videos explaining the alignment project as well as the proposals at criteria level;
- Release of accompanying documents such as the FAQs in English, French, German, Japanese, Spanish, Vietnamese and other resources for Sea Lice, Water Quality, Benthic Impacts, and Critical Indicators;
- Release of the [ASC Farm Standards Comparison Tool](#).

2 Participation

The focus of this public consultation was to engage those whose viewpoints are crucial to the credibility of the standard including hard-to-reach stakeholders and those critical of the ASC Standard's content and/or standards in general as a tool to transform aquaculture towards sustainability. For consulting on the ASC Farm Standard, ASC identified 13 stakeholder categories. Four priority stakeholder groups were identified:

1. Farm (producer) or associations thereof;
2. Retail/Brand or associations thereof;
3. Environmental and Social NGOs;
4. CABs/Auditors.

In total, there were 163 unique respondents (some respondents were individuals, others larger international organisations and associations) participating in the consultation activities. Some of these respondents provided feedback via multiple methods and therefore this number differs from the total of 220 responses. In evaluating our reach in the consultation, their input is only counted once. ASC aims to balance feedback of all stakeholder groups and does not

weight feedback dependent on quantity per group. Hence, the tables below serve informative purposes only. As the ASC Farm Standard will have production-system specific criteria and species-specific metrics, the feedback is also reported against these categories.

Feedback Method	Responses*	Respondents*
Online survey	80 responses	78 organisations / independent individuals
Webinars/workshops	76 responses	44 organisations / independent individuals
1:1 meetings and phone calls	11 responses	11 organisations / independent individuals
Emailed feedback	53 responses	51 organisations / independent individuals
Total:	220 responses	163 organisations / independent individuals

Table 1: Overall participation in the public consultation on the draft of the ASC Farm Standard.

**Responses refers to number of submissions of feedback. *Respondents refers to the number of organisations or individuals that submitted feedback. This amount will differ between columns in cases where multiple people from an organisation provided feedback.*

Bold total number of respondents counts number of respondents only once, even if feedback was provided through multiple channels.

ASC organised 27 online public workshops with stakeholders from different sectors and regions. These webinars were held over four days. Workshops typically included two to four different criteria. There were two identical sessions for each topic to accommodate different time zones. Most webinars were well attended. Four webinars had no attendees. All workshops offered Japanese simultaneous translation.

In addition to the online public workshops, ASC organised targeted informative webinars with selected regions identified as particularly relevant for this consultation. The regional webinars were well attended but directed stakeholders to other feedback methods rather than collecting feedback in session.

Direct engagement proved to be the most effective method to generate feedback for most stakeholder groups. The table below shows number of respondents per priority stakeholder group:

Stakeholder Group	Respondents
Farm (producer) or associations thereof	42
Retail/Brand or association thereof	11
Environmental and Social NGOs	53
CABs/Auditors	4
Other (<i>Academia/Research, Concerned Citizen, Consultants, Feed Mills, Government/Regulator, Intergovernmental Organisation, Primary and Secondary Processor/Trader, and other</i>)	53
TOTAL	163

Table 2: Number of respondents per priority stakeholder group, who were directly contacted. NB: Feedback was received from three farm associations and 39 farms of which 33 are certified.

2.1 Progress against participation goals

Participation goals were set for each stakeholder group identified. The table below shows the participation goals and actual respondent numbers. Participation goals across the different activities were reached in all key stakeholder groups with the exception of uncertified farms and associations thereof. Within these categories some specific groups were under-represented. These will be more carefully targeted in subsequent consultation activities.

Some stakeholders noted that the consultation on the draft of the ASC Farm Standard was very technical, with topics that some stakeholders were not comfortable answering and/or felt they lacked adequate expertise. Although ASC reached a large stakeholder base, securing feedback from some stakeholder groups was challenging. Farms, NGOs and retail/brands are examples of successful engagement.

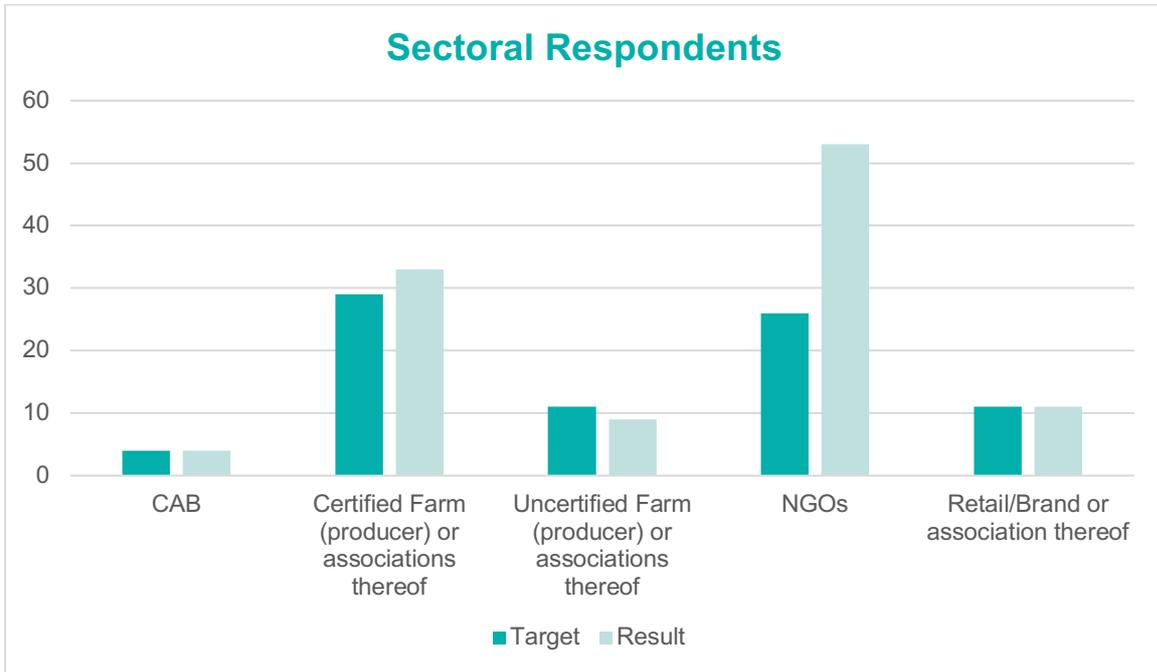


Figure 2: Sectoral representation of actual vs targets

3 Summary of feedback

The table below shows the key feedback received and the corresponding ASC responses.

Theme	Summary of Consultation Feedback	ASC Response/Next steps
Scope	The feedback from the consultation indicates that while respondents agree with including hatcheries and intermediate sites, opinions differ on the approach.	<ul style="list-style-type: none"> • ASC will refine the requirements, taking stakeholder feedback into consideration, and solicit feedback during the pilots. • In addition, regional workshops will be organised to solicit wider stakeholder feedback on the refined model.
Criterion 1.1 – Legal Compliance	Important questions about scope, auditability and how to handle illegal activity were raised, as well as whether national law or ASC Farm Standard has priority.	<ul style="list-style-type: none"> • ASC will discuss the raised concerns internally and will clarify the answers to these questions in the introduction to the ASC Farm Standard and in the accompanying guidance. • Detailed information about how to handle different regulations and legal licenses will be included in the accompanying guidance.
Criterion 1.2 – Management Systems	<ul style="list-style-type: none"> • A stakeholder noted that there was no link to fish welfare under this topic. • Indicator 1.2.4 was not clear, with some stakeholders feeling it was not necessary, given the role of the CABs. 	<ul style="list-style-type: none"> • Accompanying guidance will include more detailed definitions for management system and its applicability. • ASC will revisit the wording of Indicator 1.2.4 to improve the clarity of this requirement.
Criterion 1.3 – Business Ethics	In general, feedback about the inclusion of this Criterion was positive, but there was some pushback about the feasibility of it. Additional concerns were raised regarding the role of the UoC in preventing corruption completely and being able to ensure an ethical operating	ASC will discuss the concerns about the feasibility of these indicators and look at rewording both the Intent Statement and the indicators. In addition, ASC will look at including further information in the accompanying guidance.

	environment. There were also several questions about the auditability of this Criterion.	
Criterion 1.4 – Traceability and Transparent Disclosure	<ul style="list-style-type: none"> • There is general consensus on the need for traceability and transparency requirements, but producers (and other relevant stakeholders) are seeking to optimise systems so that there is no duplication with farm-based systems that are already operational. • In addition, stakeholders recommended that the identification of data elements is supported by relevant IT-solutions. 	<ul style="list-style-type: none"> • ASC will continue to define which requirements are able to be supported by other systems, in case present, in order to increase efficiency in the programme. • Data submission will be optimised by website portals, API's, etc.
Criterion 2.2 – Ecologically Important Habitats	<ul style="list-style-type: none"> • There was considerable push on the need for added clarity around restorative activities, siting in High Conservation Value areas (HCVs), and the role of the Risk Management Framework (RMF). There was some confusion around applicability of indicators to production systems, and acceptable levels of restoration needed along with appropriate indicators of success. • While many felt the inclusion of 'ecosystem services' critical, the mechanisms to measure and assure these are restored were deemed critical. • Some proposed considering these indicators in the contents of Criterion 2.18 – Area Based Management given impacts outside of sited area. • Overall, requirements generally accepted. 	<ul style="list-style-type: none"> • The role between restorative activities, siting in HCVs, and the role of RMF will be further clarified with the development of the RMF as it will define risks in the interactions between production systems and conservation values of habitats and where and when restoration is required. • It is clear that the guidance on siting in Protected Areas (PAs), HCVs, wetland and mangroves, and other sensitive and critical habitats must provide very clear interpretation of what is acceptable and auditable, and under what conditions restoration is required and considered successful.
Criterion 2.3 – Wildlife Interactions	<ul style="list-style-type: none"> • There was general agreement around exclusion of Acoustic Deterrent Devices (ADDs) but also notes that this needs real clarity and guidance if certain systems are to be acceptable. Additionally, concern were raised around considering cumulative impacts and how these would be evaluated. 	<ul style="list-style-type: none"> • ASC recognises the sensitivity around use of ADDs and that the technology evolves quickly. The accompanying guidance will clearly define requirements as requested. • Given the challenges associated with local population statuses and use of ADDs in aquaculture,

	<ul style="list-style-type: none"> • Respondents, particularly NGOs, raised concerns around frequency of reporting and justification for mortality incidents, as well as challenges with international and national designations of threatened and protected species. • Concerns raised over species groupings – this indicated a lack of clarity around Endangered, Threatened and Protected (ETP) species being all encompassing for species groups. • Producers wanted mortality limits. • Clear need for added guidance and additional clarity in language. • Variable opinions over inclusion of a bird mortality limits. 	we will seek further expert input into refining the indicator language and/or developing effective guidance.
Criterion 2.4 – Non-Natives	<ul style="list-style-type: none"> • 2010 date for allowance of non-native culture not accepted by NGOs. • “business as usual” not accepted by NGOs. • Farmed species are considered non-native according to some NGOs due to genetic differences. • Triploidy does not necessarily mean functional sterility. • Germ cell migration and CRISPR are conceptual research methods and not validated for functional sterility/safety for human consumption. • Invasive and known to harm is difficult to assess. 	<ul style="list-style-type: none"> • The 2010 date is in alignment with ASC’s current species-specific standards. Additionally, this will limit any potential new species introductions while continuing research and risk assessments for currently permitted non-native culture. • Genetic differences between farmed species and their native counterparts are not considered as denominators for “non-native” species. However, the impact of escaped domesticated stock on wild species will be considered as part of the RMF under Criteria 2.5 Escapes. • ASC will continue to assess sterility methods and level of invasiveness and seek input during the pilot audits regarding feasibility and auditability.
Criterion 2.5 – Escapes	<ul style="list-style-type: none"> • Defined limits (4% & 1%) have resulted in clear negative pushback from various stakeholder groups. Several producers indicate that the set numbers are too strict, and 	<ul style="list-style-type: none"> • The set metric limits will be re-considered in light of the received feedback. Reflections will be made to

	<p>that proving compliance is challenging due to counting error, whilst non-producers (both NGO but also retail) indicate that allowance of a mass escape event per cycle is too lenient.</p> <ul style="list-style-type: none"> • Several stakeholders reason that other systems (besides cage-culture) should be granted one mass escape event as force majeure events can and do occur for these systems as well. A couple of stakeholders suggest that cage culture systems should not be allowed exceptions because of their operational vulnerability (sense of rewarding poorer practices). • There seems to be agreement that ASC should set generic finfish metric limits, even though technology of counting differs between salmon vs. non-salmon. • Several stakeholders reference the need to include in the RMF an assessment of whether cultured fish are native or non-native. If non-native then the impact of escapes might be higher compared to native fish escaping – mindful that there are nuances to this as well. 	<p>consider feasibility of counting as well as stakeholder expectations.</p> <ul style="list-style-type: none"> • Considerations will be given to the impact of an escaped species on the wider environment via the RMF in such a way that high risk species are expected to meet stricter requirements.
<p>Criterion 2.6 – Benthic Impacts</p>	<ul style="list-style-type: none"> • Feedback indicated that the proposal does not address nor provide guidance on situations in which farms are situated over hard bottom. • For stakeholders it was unclear on who is responsible for taking and analysing the samples on the accreditation requirements. • Stakeholders commented that the proposal should be more explicit on how to proceed if a sampling point falls in an unsuitable location (on land, another farm, etc.) • Pushback from bivalve producers from Chile with regard to the yearly sampling required by the proposal and the 	<ul style="list-style-type: none"> • No allowance to be sited over marl bed added to the proposal as well as requirements in case a farm is located over hard substrate. • Requirements for staff conducting sampling and analysis were added to the proposal. • Guidance on how to proceed when a sampling point falls in an unsuitable location were added to the proposal. • An exemption to the yearly monitoring frequency was added to the proposal for mollusc farms that demonstrate three consecutive years of compliance

	<p>lack of allowance for extending the sampling frequency if results show no benthic impact (as per current Bivalve Standard's allowance).</p> <ul style="list-style-type: none"> • One global salmon producer suggested that ASC should accept national regulatory monitoring systems since they are adequate to the local context. The same producer, in general, challenged the proposed approach in different areas (i.e. sampling locations, the timing of sampling and the Environmental Quality Standard (EQS) systems). • Feedback from a farm association stated challenges for applying the proposed requirements in the context of the local circumstances (water brackish and naturally strongly influenced by organic matter from other [land-based] sources). • Concerns were also raised around the need to conduct both, redox and sulfide monitoring. 	<p>with the requirements, in line with the current requirements of the ASC Bivalve Standard.</p> <ul style="list-style-type: none"> • Revised proposal is now clearer on the fact that marine water requirements also apply to brackish waters. • More engagement with CABs will be required for the next consultation aiming to understand challenges that they might encounter interpreting and assessing the requirements.
Criterion 2.7 – Water Quality	<ul style="list-style-type: none"> • Some feedback indicated concerns in relation to the practical application and operationalisation of the proposal in the context that its approach looks significantly different compared with current requirements in regards with the number of variables to measure some of which they do not currently measure. 	<ul style="list-style-type: none"> • The work ahead aims to align the proposed requirements across the three systems (lakes and reservoirs, flowing freshwater, and saltwater) as far as possible and to develop requirements that are adequate to the variety of different circumstances that might be encountered within a same system. Furthermore, the ASC aims to develop differentiated requirements between situations where nitrogen and phosphorous become limiting or co-limiting eutrophication factors by using a mass-balance ratio method.
Criterion 2.8 – Salinisation	<ul style="list-style-type: none"> • General questions were received about the rationale with comments ranging across inclusion of brackish water, scope, effluent systems/pipework and the applicability of 	<ul style="list-style-type: none"> • Further context and explanation on land discharge will be developed.

	<p>the discharge of effluent over land to tidal areas. The majority of the feedback was received on the criterion banning the use of plastic pond liners.</p> <ul style="list-style-type: none"> • The term highly permeable remains undefined with no input into what that will look like in terms of the use of liners. • Banning the use of plastic liners can have widespread implications for cost and feasibility and may be a barrier for developing countries. 	<ul style="list-style-type: none"> • Targeted feedback on certain aspects of the Criterion will be sought during pilots and the next public consultation.
Criterion 2.9 – Biosolids	<ul style="list-style-type: none"> • No major concerns but respondents do not agree on whether estimating key nutrients would be feasible for the farmers or not. • One farmer commented that the list of allowed activities might be limiting, none of the other farmers saw this as an issue. • No negative response to the focus on reuse/recycling. 	<ul style="list-style-type: none"> • Proposal whether estimating key nutrients would be feasible for farmers will be tested during pilots.
Criterion 2.10 – Freshwater Use	<ul style="list-style-type: none"> • Significant disagreement across stakeholder groups was seen within this criterion. For example, some stakeholders feel water in wells or minimum vital flow should be measured, while others see barriers or an inability to do this. The necessity of reducing water consumption in regions without water scarcity also varies widely. • The need for further clarification of the scope, as well as rationale for this decision is needed (e.g., if freshwater treatments in salmon farms are excluded, how does the total volume used in these treatments compare with, for example, a highly efficient Recirculating Aquaculture System (RAS) system?). • Concerns have been raised around the RMF – more detail is needed by stakeholders to understand the intent. 	<ul style="list-style-type: none"> • Further context and explanation on the scope and rationale of the Criterion will be developed. • Due to the lack of input from small-scale producers, which makes it difficult to discern the impacts requirements may have on their production, or their ability to achieve the requirements overall, targeted feedback will be sought during pilots and the next public consultation.

	<p>Concern has been raised around the utility of these documents if they are created by the producers.</p> <ul style="list-style-type: none"> • Lack of input from small-scale producers makes it difficult to discern the impacts requirements may have on their production, or their ability to achieve the requirements overall. 	
<p>Criterion 2.11 – Energy Use and Greenhouse Gas Emissions</p>	<ul style="list-style-type: none"> • Several respondents are looking for either incentives or requirements to demonstrate reductions in Greenhouse Gas (GHG) emissions. Some specifically reference alignment with the Science Based Target Initiative (SBTi), while others more generally ask for a system to set a base line of emissions and reduce from there. This was most common among retail/brand respondents. • A number of farm producers disagreed with the use of chicken as a trigger level for Environmental Enhancement and Mitigation Programme (EEMP) requirements, either for relevance, fairness due to chicken’s lower grow-out time, feasibility to achieve for many farm types, or the use of trigger levels at all instead of requiring EEMP measures for all farms. Reference was made to types of farms for which energy inputs will always be high, and some comments also questioned the use of total energy use as opposed to just energy from non-renewable sources. • Several respondents asked for methodological guidance to be provided before they can comment, and one specifically asked for guidance for public consultation. Farm producers mentioned lack of expertise, most likely to affect smaller producers. One producer specifically mentioned alignment of methodological guidance with IDH (note that an ISEAL-facilitated working group on GHG 	<p>Methodological guidance will be developed to accompany this criterion. Further engagement with multiple stakeholder types will be required to inform the development of the accompanying guidance, in particular identifying challenges and barriers to collecting and reporting required data. Discussions with the Energy Use and Greenhouse Gases Technical Working Group will provide necessary expertise to inform that guidance and the final indicators. The main concerns brought forward during public consultation will also be brought to that working group.</p>

	methodologies with IDH and other certifications and ratings bodies is ongoing).	
Criterion 2.12 – Material Use, Waste and Pollution Control	<ul style="list-style-type: none"> • Producers expressed concern around their ability to comply with a number of indicators, including the reduction of single-use plastics (SUPs), use of plastic retention devices, and tagging products. Clarification of cleaning in situ is needed. Some indicators require a clearer definition of what types of systems are to be included (e.g., net pens). Some feedback included references to other standards to review and potentially use as a framework for further development. • This indicator received a wide variety of comments across the proposed indicators. • Recommendation to align requirements with Global Ghost Gear Initiative’s Aquaculture Best Practice Framework. • Clearer scope around hormone release. • Questions around copper treatment and certain scenarios that could be covered in guidance were raised (and use of biocides). • Cost, utility and ability to tag materials may be too difficult. Proposal that proper management systems cover the intent, or that only significant products are tagged. • COVID and food safety implications for single use plastics are needed. • Further detail needed on indicator language. 	Further engagement with small producers will be pursued at the next consultation and piloting activity.
Criterion 2.13 – Feed	<ul style="list-style-type: none"> • There was significant feedback on the need for requirements on the feed ingredients, which suggests that it needs to be clearer in the Farm Standard that these are addressed in the Feed Standard. 	<ul style="list-style-type: none"> • Further context and explanation on the scope and rationale of the Criterion as it relates to the Feed Standard will be developed.

	<ul style="list-style-type: none"> • There is concern from producers and feed mills that some farms may not be able to purchase ASC feed as per the new Feed Standard (Indicator 2.13.1). Respondents based in Asia/Japan were particularly concerned. • A concern was raised that closed systems should not be required to purchase ASC compliant feed as compound feed is wasteful in such a system. • Indicator 2.13.2 received pushback from many different stakeholders on the feasibility of requiring certified seaweed. • There was a lot of concern from Environmental NGOs and other stakeholders that the Forage Fish Dependency Ratio (FFDR) values have not been revised, particularly for salmon (Indicator 2.13.3). • Some respondents indicated that they were aware of species which rely on feeding wet feedstuffs or moist pellets (Indicator 2.13.6). This appears to be occurring in Asia and tuna was named as a relevant species. 	<ul style="list-style-type: none"> • Targeted feedback will be sought during the pilots on feed requirements within closed systems and the feeding of wet feedstuffs or moist pellets. • Indicator 2.13.2 will be revised to remove certified seaweed as a requirement, but guidance will be developed as to what is meant by a ‘well-managed’ resource of seaweed. • The FFDR values will be reviewed – the process for which is to be determined.
<p>Criterion 2.14 – Fish Health</p>	<ul style="list-style-type: none"> • Most feedback was positive, highlighting no major concerns against the scope, rationale or intent. Only three NGOs highlighted that impact on local wildlife in terms of health and welfare should be considered (this has already been included within the new welfare content). • When it comes to specific indicators, indicator 2.14.4 and other indicators related to mortality and survival rates raised an elevated number of comments by a mixture of organisations including a minority of farmers. Indicator 2.14.12 raised some concerns amongst farmers when it comes to its requirements on antibiotic sensitivity testing. Farmers felt the current requirements were not realistic or 	<p>Some areas of improvement were identified. These are currently being revised in accordance with the feedback received.</p>

	<p>achievable. Indicator 2.14.10 also raised pushback amongst farmers and one NGO, which thought the requirement to cull when an OIE-notifiable disease is detected was excessive. Finally, Indicator 2.14.1 raised concerns amongst producers as there is lack of clarity on what is understood as an effective vaccine or a relevant disease.</p>	
<p>Criterion 2.15 – Parasite Control (excl. Sea lice)</p>	<ul style="list-style-type: none"> • Feedback from producers was positive overall however concerns were expressed around the proposed requirements related to sediment monitoring of parasiticides, the rotation of treatments, susceptibility testing and the public disclosure (of ectoparasite sampling results and resistance). • Indicator 2.15.4 received pushback from some producers who argued that the regulatory approval of parasiticides already covers potential impacts on sediments and that there is no need for additional sampling. • Stakeholders recognise the value of conducting susceptibility testing (Indicator 2.15.5) however, this represents increased cost to producers, is time-consuming, might cause delays in implementing treatments and, in some areas, is not available. Suggestions mentioned the idea of conducting them the second time a parasiticide is used in a row. • Stakeholders expressed concerns regarding the disclosure requirements (2.15.12 and 2.15.13) as they can cause a negative effect, and could be misleading. 	<ul style="list-style-type: none"> • It needs to be ensured that further feedback is captured from producers during the piloting period.
<p>Criterion 2.15x – Sea Lice (to be released initially in a revised</p>	<ul style="list-style-type: none"> • ASC regional sea lice thresholds and sensitive periods: Some feedback (especially from ENGOs) expresses 	<ul style="list-style-type: none"> • For now, given the available information today, the Technical Group (TG) that is supporting ASC with this

<p>ASC Salmon Standard)</p>	<p>concern on the use of current regulatory limits as the ASC limits for sea lice.</p> <ul style="list-style-type: none"> • Timeline for bringing lice levels below established thresholds and consequences of exceedances: Feedback was not conclusive in the preference of stakeholders. Feedback on the timeline fluctuated between 1 week to 42 days. • Sampling, treating and exemptions and disclosure: Concerns were expressed around the exemptions of the requirements and the requirements on disclosure. • Area-based management: Overall, positive feedback received from stakeholders on the revision of this topic. 	<p>revision believes that its recommended approach to the revised indicator on sea lice is still the most adequate suggestion to ASC at this time.</p> <ul style="list-style-type: none"> • A timeline of 21 days is proposed by ASC. • The TG reaffirms its belief that the recommended exemptions are appropriate.
<p>Criterion 2.16 – Antibiotics and other Veterinary Therapeutants</p>	<ul style="list-style-type: none"> • Need to clarify where criterion 2.16 applies to the whole life cycle of the animal, Unit of Assessment (UoA), or UoC (implications for criterion 2.17). • Industry pushback to antimicrobial susceptibility testing (2.16.7), as well as to species-specific limits on number of antibiotic treatments (2.16.13), and reduction of antibiotic load or number of treatments (2.16.14). • Industry pushback regarding disclosure of antimicrobial resistance (2.16.16). • Discrepancy between 2.16.12 (critically important antibiotics) and the trout standard, which considers oxolinic acid an exception. • Annex 1 needs to be reviewed, standardised and improved. 	<p>The issues highlighted are currently being revised by the Technical Working Group (TWG). Feedback will be taken into account during this process and integrated as appropriate. This will be done through a series of meetings that will take place during the summer.</p>
<p>Criterion 2.17 – Hatcheries and Intermediate Sites</p>	<ul style="list-style-type: none"> • Broadly, the proposal to expand the scope of ASC audits to cover hatcheries and intermediary sites was widely accepted and encouraged. Most feedback encouraged the use of third-party auditors, rather than second-party 	<ul style="list-style-type: none"> • ASC will develop a risk matrix to determine which production types/systems will be required to undergo which level of assessment (e.g., lower-risk systems

	<p>auditors, though it should be noted that this feedback was primarily from environmental NGOs. CABs showed concern around the time required to conduct all audits, while producers were more accepting of the use of qualified internal auditors.</p> <ul style="list-style-type: none"> • Scope requires further definition to ensure it is clear what aspects of production are/are not covered (e.g., brood was raised by multiple stakeholders) • Best Aquaculture Practices requirements for hatcheries/intermediate sites were raised as a differentiator between the programmes • Some push for a separate hatchery standard • Ability to provide ASC feed at hatchery level was a concern 	<p>receive internal audit, high-risk systems require third-party audit)</p> <ul style="list-style-type: none"> • Full description of scope and any areas of the standard that are/are not relevant will be created, as well as any specific areas requiring exclusion.
Criterion 2.18 – Area Based Management (ABM)	<ul style="list-style-type: none"> • Feedback indicated that most stakeholders agree with proposed content, although several (NGO) stakeholders seek to widen the scope of the ABM criteria. • To see if ABM can be required for all sites during the production process (incl. hatcheries and intermediate sites). • To require a feedback loop after monitoring/surveillance to impacts addressing – possibly covered by RMF. 	<ul style="list-style-type: none"> • Further development will lead to revised content in a future version of the ASC Farm Standard. • Producers indicate the need for guidance, training and supporting documents for the implementation of ABM. This will be covered by accompanying guidance development, as well as later UoC training modules. • Although engagement was sufficient, producer input from other species besides salmon will be requested at the next consultation round.
Criterion 3.1 – Rights Awareness	<p>There were no significant issues raised for this Criterion, although two stakeholders raised questions regarding diving, in relation to medical testing, indicating that some further guidance on this would be useful.</p>	<ul style="list-style-type: none"> • Further details on when medical testing is allowed and appropriate, including for diving, will be outlined in the accompanying guidance.
Criterion 3.2 – Forced Labour	<ul style="list-style-type: none"> • In general, respondents supported the requirements, with a few comments suggesting for strong penalties or blacklists for non-compliance, balanced by a comment 	<ul style="list-style-type: none"> • ASC notes that continued engagement with a farm who has a non-conformity in this area is more productive than removing them immediately from the

	<p>that advocated continued engagement rather than cutting off the supplier which would prevent change.</p> <ul style="list-style-type: none"> • Remediation: Many noted that there should be a required timeline for remediation, that includes immediate rectification and longer-term strategy. Another NGO noted that remediation should include procedures for ASC and CAB to enact, rather than it being incorporated in the Standard, as expert intervention is required and the UoC should not be left to resolve the issue independently. • There were some comments about the RMF and when it should be applied. • Feedback that for requirement 3.2.4, recruitment agencies should additionally be required to demonstrate transparency and ethical standards in recruitment methods and guidance. • For indicator 3.2.13 on prison labour, a need for further clarification on the intent that the recruited workers are not prison laborers. 	<p>certification programme. Remediation is an important part of this, and ASC will continue discussions on how to handle non-compliance on these indicators.</p> <ul style="list-style-type: none"> • A remediation timeline and additional guidance on the engagement of experts in the remediation process will be included in the accompanying guidance. • Further clarity on prison labour will be included in the accompanying guidance.
<p>Criterion 3.3 – Child Labour</p>	<ul style="list-style-type: none"> • 3.3.5 Light work received pushback from the expert consultation, who felt that although it was in line with ILO Standards, they were concerned that allowing light work could give the impression that ASC is "lowering the bar". Retailers also raised concerns on light work and two said that light work should only be allowed at family farms. • Stakeholders emphasised "light work" and "hazardous work" for children need to be better defined. • Several experts also suggested that working hours restrictions on light work be included in Criterion 3.2 (child labour) rather than 3.9 (working hours). 	<ul style="list-style-type: none"> • ASC will reframe the language of the Rationale to better express the intent of this Criterion. • ASC will consult internally and externally to work on Indicator 3.3.5 on 'light work' to redraft the language. • Changes in this Criterion will include an emphasis on national laws regarding light work for children. • The accompanying guidance will include guidance on what light work is, and what is considered hazardous work. • A remediation timeline and additional guidance on the engagement of experts in the remediation process will be included in the accompanying guidance.

	<ul style="list-style-type: none"> • Stakeholders noted potential challenges in alignment with national laws. • There was feedback on the language used in the Rationale with a stakeholder commenting that it makes child work seem desirable and suggested using "permissible" in given circumstances instead. Another participant thought language was fine and in line with ILO as is. 	
Criterion 3.4 – Discrimination	There was general agreement on the content and requirements of this Criterion, although a retailer noted that discrimination is a very difficult topic to build requirements on and it could be clearer if the indicators were broken down into smaller pieces.	ASC noted that comments said that this is a complex topic and will revisit the language in the Rationale to work towards more clarity.
Criterion 3.5 – Health and Safety	The comments covered a broad range of issues and were largely in agreement with the direction of the indicators, but stakeholders noted some questions they had and areas for further clarification. For example, defining the term 'suitable' in 3.5.13 in the reference to 'suitable areas for breastfeeding', and clarifying requirements around diving safety, which currently sit in a footnote to indicator 3.5.6. As expected, there was some indication that stakeholders needed more information about the RMF.	<ul style="list-style-type: none"> • ASC will make some small changes in language in some of the indicators for more clarification. • Information about what should be included in sanitary facilities will be outlined in the accompanying guidance. • There will be extensive guidance provided for the use of the RMF.
Criterion 3.6 – Collective Bargaining and Freedom of Association	There was a suggestion around changing language for clarification that employees are allowed to form worker organisations (indicator 3.6.1), rather than just being 'informed' that they are free to do so. Otherwise, the comments were in general agreement with the Criterion.	ASC will revisit 3.6.1 to look at slightly rewriting this indicator for further clarification.
Criterion 3.7 – Transparent Contracts	There was a question about sub-contracting and how the Standard applies to sub-contractors, but overall, there was strong agreement with these indicators.	ASC is working internally on more clearly defining sub-contractors and information on this will be included in the accompanying guidance.

<p>Criterion 3.8 – Wages</p>	<ul style="list-style-type: none"> • Feedback stated that requiring wages set at minimum wage or a basic needs wage in consultation with workers or representative worker organisations is not sufficient, and that living wage indicators should be added in the Standard. Several commenters suggested that these requirements need not require payment of a living wage immediately, but rather require demonstrated incremental improvement towards payment of a living wage. • Several commenters addressed the issue of inadequate living wage benchmarks, saying that this should not be a barrier to living wage indicators. One NGO recommended (their) salary matrix tool as a means of capturing data and suggested that sufficient fair wage benchmarks could be found on their Benchmark Finder Tool. 	<ul style="list-style-type: none"> • ASC is working internally and in collaboration with the Global Living Wage Coalition on how to include requirements around living wage in the Standard. • The approach of demonstrating incremental improvement towards payment of a living wage will be tested in the ASC Farm Standard pilots. • ASC is also engaging in looking at how to support producers to measure the current wages and understand the gap between what they pay and a living wage.
<p>Criterion 3.9 – Working Hours</p>	<ul style="list-style-type: none"> • The most common theme in the feedback was a request for more flexibility in the working hours. There was significant pushback on indicator 3.9.12, with producers saying that 8 hour working days were not feasible, particularly when employees were in remote locations. Several stakeholders noted that their companies followed national law on working hours, which seemed to provide more flexibility than the ASC requirements, and developed agreements with employees on working hours, often using averaging to allow longer working days followed by a greater number of rest days. Some producers noted that indicator 3.9.12 was not feasible for them. • There was also pushback on indicator 3.9.5 on overtime hours, with a producer saying that they allow a great number of overtime hours, as per national law, and agreements with employee representatives. 	<ul style="list-style-type: none"> • ASC will revisit the indicators on working hours and look at the possibility of including more flexibility, while remaining in line with the ILO. • ASC will also look at incorporating a form of averaging into the requirements. • ASC will work on the requirement around overtime, and overall will look at how to include reference to national laws.

Criterion 3.10 – Workplace Conduct Response	There was just one significant comment on this Criterion from a CAB, who said that deducting wages as a disciplinary measure is allowed in Japan and they felt that the indicator (3.10.3) that prohibited deducting wages would not be easy for Japanese companies to follow.	ASC will ensure that the accompanying guidance is clear on the reasoning behind not deducting wages as a disciplinary measure, so that producers can more clearly understand the intent.
Criterion 3.11 – Employee Accommodation	Suggestions for additional content either in the indicators or the guidance. The retailer noted that safety (particularly for women) in accessing sanitary facilities was more important than having (for example) a flushing toilet. A producer also noted that this Criterion should include content on correct and safe disposal of waste and running water.	The comments on safety in accessing sanitary facilities and correct and safe disposal of waste and running water have been noted and this information will be included in the accompanying guidance.
Criterion 3.12 – Grievance Mechanism	Most feedback addressed the issue of a remediation timeline, with the majority agreeing that 90 days is a feasible timeframe for remediation. Numerous respondents however also emphasised that more specificity and a timeline be added for remediation.	Guidance on a shorter timeframe for notification that a grievance is being processed; guidance on when remediation safeguarding actions need to take place quickly to address critical situations and guidance on how to handle remediation processes that may require a longer timeline will be covered in the accompanying guidance.
Criterion 3.13 – Community Engagement	<ul style="list-style-type: none"> • There was pushback on the way that combining the two Criteria (previously one on Indigenous communities and one on local communities) meant that not enough attention was paid to Indigenous communities as distinct from other communities. Some stakeholders agreed with combining the two Criteria, however. • There was significant feedback, particularly from environmental NGOs, that requirements around Free, Prior and Informed Consent (FPIC) must be included in this version of the Standard. 	<ul style="list-style-type: none"> • ASC will work internally on the issue of combining the two Criteria and work out how to address this. • ASC will work with external experts on developing some indicators around FPIC, with accompanying extensive guidance on this.

Annex 2 – Data Recording & Submission	<ul style="list-style-type: none"> • Support for the approach, welcome change in approach. • Need for justification and value communicated in data collected. • Clear need to consult with producers and CABs to ensure templates and methodologies reflect actual mechanisms of data collections. 	<p>ASC intends to consult with producers, CABs and others to fully understand the ways in which data are currently collected on farms and the associated needs for data submissions. This dedicated expert feedback is critical for the success of the data submissions. Anyone interested in contributing should reach out to data@asc-aqua.org.</p>
Annex 3 – Risk Management Framework	<ul style="list-style-type: none"> • Concerns about lack of independence and impartiality, which were present in the BEIA / PSIA, as the farm will be conducting the process themselves. • Concerns around feasibility of operation - may be too much for companies to handle in an ongoing manner and might be duplication of work for some companies. • Concerns over credibility of the results of the tool, linked to credibility of the inputs. • Concerns over outcomes and what is acceptable risk. 	<p>ASC noted the concerns and has taken them to the internal working group. These issues will be addressed extensively through the development of the project and the outcome shared with all stakeholders.</p>

3.1 Full feedback

Dashboards and full feedback are published [here](#).

3.2 Next steps

ASC will undertake consultation activities on Benthic Impacts as well as Fish Health and Welfare in the period from September to October 2022. Certain topics will be tested during the pilot audits. Workshops will also take place during the pilot period. Pilot audits will be undertaken between October 2022 and March 2023. A final, full 30-day consultation on the resulting ASC Farm Standard will be conducted in September 2023 before the final product is presented to the ASC Technical Advisory Group (TAG). The TAG will provide a formal recommendation to the ASC Board to adopt the ASC Farm Standard in March 2024.

Annex: List of respondents

Organisation	Name
Acuacultura y Pesca	Jose Luis
AEON Co., Ltd.	Yumie Kawashima; Hiroshi Tsukasa
Agrupación turística, cultural y medioambiental Mar y Tierra	Tamara Ojeda Uribe
Åkerblå AS	Dora Marie Alvsvåg
AMITA	Wataru Koketsu/Sughara Yoichi/ Naoya Ogawa; Chiko Tsukazaki (Ctsukazaki)
andBlue Group	Toshiki Kanemitsu
Anderson Cabot Center for Ocean Life at the New England Aquarium	Matt Thompson
Aqua4c NV - Omegabaars	Fransman Charles-Aimé
Aquascot	Dr Andrew Davie
Aquatic Life Institute	Catalina
Arnarlax	Nikolas Tzamouranis
Arxada AG	Dr Carsten Baehr
ASOCIACION NACIONAL DE ACUICULTORES DE HONDURAS (ANDAH)	Lisandro Javier Amador
Atlantic Salmon Federation	Dr. Stephen Sutton
Auditor	Naoya Ogawa
Australian marine conservation society	Adrian Meder
Avramar Aquaculture	Cecile Baulard
Beijer Institute of Ecological Economics	Patrik Henriksson
BlueWater Spa	Jose Luis Blanco Garcia
Blueyou Consulting GmbH	Thomas Egli, Jonas Walker
BOLTON FOOD	Hector Martin Fernandez Alvarez
Camanchaca Cultivos Sur S.A.	Roosebelt Morán
Cermaq Norway	Ingunn Johnsen
Clayoquot Action Society	Bonny Glambeck
Coastal Communities Network - Scotland	John Aitchison
cofimar	Maria Baquerizo
Compassion in World Farming & RETHINK FISH CAMPAIGN	Dr. Krzysztof Wojtas
Conservation Council of New Brunswick	Matthew Abbott
Cpf india pvt limited	Latha
Cromaris	Julija Smoljan
Dainichi	Mr Yuta; Mr Yosuke Takeda
Dalhousie University	Nathan Ayer
Danish Aquaculture Association	Lisbeth Less Plessner
Dartmouth University	Eric Edmonds
David Suzuki Foundation	Kilian Stehfest
Defendamos Chiloé	Juan Carlos Viveros
Delica Friends seafood company	Shinjiro Yoshihara

Deutsche Aquakultur e.V.	Frederike Baumann
DNV Business Assurance Italy SRL	Sabrina Bianchini
Earthworm	Florie Loth; Clara Gitto
Ecology Action Centre	Simon Ryder-Burbidge
Ehime University	Atsushi Ido
Environment Tasmania	Jilly Middleton
Evonik Operations GmbH	Marion Hax
Fauna & Flora International	Gabriella Church
FEED ONE CO LTD	Koji Otsuka; Fuminori Endo
Fisheries Management Scotland FMS	Charlotte Middleton
FRD	Michihide Yamagishi - (山岸路秀); Daiji Tadokoro (田所大二); Yoshikazu Koizumi
Freelancer seafood company	Ooishi
Georgia Strait Alliance	Lucero Gonzalez
Global Ocean Works (GOW)	Ms Fukiko Fujimura
Granjas Marinas San Bernardo	Martin Lainez
Greenpeace Canada	Sarah King
Grieg Seafood BC Ltd	Kristin Storry; Luke Pletsch; Sam Tomkinson
Hatko	Mert Bozkurt
Healthy Bays Network	Brian Muldoon
HUBCO	Virginie LAMATIERE
IDH, the Sustainable Trade Initiative	Lisa van Wageningen
IKEA	Christoph Matthiesen; Azaliah Mapombere
INCIDIN	Rafiqua Islam; Masud Ali
individual	Iain Pollard
Individual seafood company	Yoichi Sugahara
INRAE	Joel Aubin
International Labour Organisation ILO	Lorenzo Guarcello
Japan Salmon Farm (JSF)	Mr Suzuki Kosuke
Japanese Consumers' Co-operative Union	Satoshi Matsumoto
JASS Ventures Pvt Ltd	Joe Antony
Jelebrat S.A.	Alexandra Martínez
JLB Management Consultancy Pty Ltd	Dr Peter Lauer
Kaneko Sangyo (Co.) 金子産業 (株)	Takashi Hara (原 隆)
Kansai Electric Power	Keinosuke Suzuri
Kefalonia Fisheries	Aggeliki Lada
KH Select	Olga KH Select
KILIÇ SEAFOOD CO.	Engin Mola
Killora Community Association	Gerard Castles
KU Leuven	Filip Volckaert
Kumamoto-ken Kaisui Yoshoku Gyogyo Kyodo Kumiai	Akiyuki Kanabo

Kurose Fisheries Co., Ltd. 黒瀬水産株式会社	Aika Hidaka 日高愛華; Yukiko Yamashita (山下有紀子),
Labeyrie Fine Foods (Group)	Manon Durbec
Laboratorio Ramalab EIRL	Hilda Castro Barrera
Leibniz-Institute of Freshwater Ecology and Inland Fisheries (IGB)	Fabian Schäfer
Lidl Belgium	Kelly Hauspie, Ines Verschaeve
Litoral Austral Ltda.	natalia gonzalez
Living Oceans Society / SeaChoice	Kelly Roebuck; Karen Wristen
LP Foods Pte Ltd	Le Thi Van Thanh
Marine Conservation Society	Dawn Purchase
Marine Easy Clean Pty Ltd	Roger Gagliardi
Marine Foods seafood company	Hideki Hayashi
Marine Gold Products	Sirikwan Wongrad; Thunyarate Konkaew
Marlborough Environment Centre	Beverley Doole
MARUBENI NISSHIN FEED CO., LTD.	Shion SATO
Maruha-Nichiro	Toshihiki Yamaguchi ; Hiroaki Sano; Yuta Hamasaki; Asami Zenimura; Satomi Kanagawa; Takashi Kouyama; Tatsumi Iwabuchi; Toshikazu Kitagawa;
Marukin	Shingo Suzuki
Meralliance (Thai Union group)	Vincent Gelamur
Minato Shimbun	Kentaro Furuya
Mission Blue	Max Bello
Monterey Bay Aquarium Seafood Watch	Tyler Isaac
MOWI ASA	Catarina Martins
Native Fish Society	Mark Sherwood
Nature Canada	Mark Butler
Natuurpunt	Sarah Tilkin
Neighbours of Fish Farming	Peter George
New Brunswick Salmon Council Inc	Gary Spencer
New Generation seafood JSC	Van Huu Loc
Next Tuna GmbH	Paul-Daniel Sindilariu
Nichirei Fresh Inc.	Yutaka Hiroshi Ishiguro; Makota Sonoda; Wakako Suzuki; Motohiro Kiuchi ; Toshiyuki Miyachi
Nippon Suisan Kaisha, Ltd.	Toshiya Yabuki; Fumie Kato
NOAA National Marine Fisheries Service	Amy R Scholik-Scholmer
Nomad	Oliver Spring
North Atlantic Salmon Fund	Elvar Fridriksson
Only One	Aaron Kinnari
Pacific Coast Wild Salmon Society	Alexandra Morton
Parley for the Oceans	Micheal Long
Philosofish	Dimitra Xodoa
Picard	Sidonie Malegeant

Pontificia Universidad Católica del Perú	Ian Vazquez-Rowe
Productos del Mar Ventisqueros S.A.	Carlos Garcia
Prosol (Grand Frais Marée)	Solenne Arnal
Regal Springs	Emily McGregor; Anne-Marie Köch
Rewilding Argentina Foundation	Martina Sasso
Sakamoto Feed Corporation Ehime Office (坂本飼料株式会社 愛媛営業所)	Ichiro Fukushima (福嶋一郎)
Salmon and Trout Conservation Scotland	Andrew Graham-Stewart
Salmon Reform Alliance	Dr. Lisa-Ann Gershwin
Salmon Scotland	Richard Beckett
Sardina d.o.o.	Darija Škarić; Božena Radić
Save on Foods	Miguel Santos
Scottish Sea Farms	Anna Price
SCS Global Services	Adam Daddino
Sea Legacy	Diego Jiménez
Seafresh Industry Public Company Limited (Seafarm)	Ung Poh Lynn
Seagreen Research	Peter Bridson
Seoka Aquaculture Consulting	Seoka, Manabu (瀬岡 学)
SkeenaWild Conservation Trust	Julia Hill
Skretting Japan	Yoshiaki Ina; Ken Sakurai
Stingray Marine Solutions AS	Julie Døvle Johansen
Sustainable Fisheries Partnership (SFP)	Elena Piana, Dave Martin, Paul Bulcock
Tasman Peninsula Marine Protection	Trish Baily
Tasmanian Alliance For Marine Protection (TAMP)	Trish Baily
Tasmanian Conservation Trust	Peter McGlone
Tasmanian Independent Science Council	Christine Coughanowr
Tassal Group Pty Ltd	Deleeze Chetcuti
Tesco	Ben Weis
The Danish Institute for Human Rights	Tulika Bansal
Toppits Foods Ltd.	Cassandra Maldeniya
Toyo Reizo	Tomoyuki Umetsu
TRAPIA MALAYSIA SDN BHD	Nur Atiqah Sulaiman; Teow Hang Ou; ROS SUHAIDA RAZALI
University of British Columbia	Nathan Pelletier/Andrea Frommel
University of Patras	Pavlos Avramidis – Associate Professor
URATASUISAN CO.,LTD	Masaki Urata
US Dept Labor	Chanda Uluca; Kyle Livingston
Uwajima City Hall	Yoichi Shinomiya
Veramaris VOF	Ian Carr
Vitapro S.A.	Gloria Montenegro
Watershed Watch Salmon Society	Stan Proboszcz
Wild Rise Company	Corin Smith

Wildfish Conservancy	Kurt Beardslee
World Organisation on Animal Health OIE	Dante Matéo; Ólafur Valsson
WWF	M. Macleod on behalf of WWF
WWF Chile	María Jesús Gálvez
WWF Malaysia	Victor Andin; Wei Chor; Chor Khang
WWF Sweden	Inger Melander
Yumigahama Fisheries (弓ヶ浜水産)	Ryouji Kuranaga; Hatsumi Wakai (若井初実); Akira Takeshita
ZIZZO BILLANTE HERMANOS S.A.	Miren