



ASC Variance Request Procedure

ASC Requirements

Version 2.0

March 9, 2023



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1. Introduction

The Aquaculture Stewardship Council (ASC) is an independent, not-for-profit organisation that operates a voluntary, independent third-party certification and labelling programme based on a scientifically robust set of standards. The ASC standards define criteria designed to help transform the aquaculture sector towards environmental sustainability and social responsibility, as per the ASC Mission.

ASC Vision

A world where aquaculture plays a major role in supplying food and social benefits for humanity whilst minimising negative impacts on the environment.

ASC Mission

To transform aquaculture towards environmental sustainability and social responsibility using efficient market mechanisms that create value across the chain.

Variance Request (VR) Process

Conformity Assessment Bodies (CAB) may encounter a situation where an adaptation of ASC Requirements (Standards, Requirements of the Unit of Certification [RUoC] or Certification and Accreditation Requirements [CAR]) to a local context is required, whilst adhering to the original intent. To address this need, ASC has developed a Variance Request (VR) Process. Adapting a global standard to a local context is permitted under the International Social and Environmental Accreditation and Labelling Alliance (ISEAL) Codes of Good Practice. The VR Process is connected to ASC's Standard Setting Procedure and ASC's CAR Development and Revision Procedure. All VRs will be evaluated for inclusion during the development or revision of ASC Requirements.

To ensure transparency, all VRs are publicly available on the [ASC's Variance Request and Interpretation Platform](#).

2. Purpose

This procedure outlines the steps for submission, processing, and the publishing of VRs. For standards-related VRs, this includes the consideration of any received stakeholder feedback. The procedure ensures that all VRs are processed in a consistent manner and that outcomes are clear and replicable.

3. Scope

This procedure applies to VRs regarding ASC's standards, ASC CAR and RUoC (CAR), and other requirements applicable to certificate holders or CABs

4. Effective Date

The procedure will be effective from 9 June 2023.

5. Supporting Documents

- [ASC Standards](#)
- [ASC Certification and Accreditation Requirements \(CAR\)](#)
- [ASC Requirements for Unit of Certification \(RUoC\)](#)
- [VR Committee Terms of Reference \(TOR\)](#)
- [ASC Standard Setting Procedure](#)
- ASC Certification and Accreditation (CAR); Development, Revision, Approval and Communication Procedure
- [ASC Privacy Policy](#)
- [ASC GDPR Data Protection Policy](#)

6. Terms and Definitions

- Available at: <https://data.asc-aqua.org/asc-vocabulary>
- All timelines listed in this procedure are expressed as calendar days.

7. Roles and Responsibilities

- 7.1** VR Applicant (Applicant) – Conformity Assessment Body (CAB) responsible for submitting a VR using the ASC Variance Request and Interpretation Platform and for following this Procedure.
- 7.2** VR Committee – Responsible for making the decision to approve, not approve or decline a VR. The VR Committee members are listed in the VR Committee Terms of Reference (TOR).
- 7.3** Aquaculture Stewardship Council (ASC) – Responsible for following and updating this procedure.

8. Submission and Formulation Requirements

- 8.1** VRs shall be submitted by the CAB via the MyASC Variance Request and Interpretation Platform (the VR Platform).
- 8.2** The CAB shall check the VR Platform to determine if a similar VR has already been processed prior to submitting a new request. The CAB may reference the previously approved VR in the audit report if all the following conditions are met:
- 8.2.1** The clause or indicator and requirement wording remains the same in the most recent document version that is under the scope of the VR, regardless of if the clause or indicator number has changed.
- 8.2.2** The previously approved VR does not contradict or conflict with a new clause or indicator intent or indicator requirement introduced or altered in the later document version.
- 8.2.3** There are no conditions in the previously approved VR that limit the applicability of:
- Audit
 - CAB
 - Certification cycle
 - Certificate holder
 - Geographical scope
 - Production cycle
 - Site
 - Species
 - Time range
 - Unit of Certification (UoC)
- 8.2.4** The VR has been approved.
- 8.2.5** The VR is not archived.
- 8.3** All VR submissions shall:
- 8.3.1** Be written in clear and concise English.
- 8.3.2** Be related to Indicator(s) from a single Criterion of a Principle; if the VR is related to an ASC standard, or a single clause; if the VR is related to the CAR.

8.3.3 Standard-related VRs:

8.3.3.1 For initial audits, VRs may be submitted as soon as an audit announcement for the relevant UoC has been published on the ASC website.

8.3.3.2 For initial or re-certification audits, VRs shall be submitted no later than 28 days after the completion of the audit for the relevant UoC.

8.3.3.3 VRs may be submitted at any point during the certification cycle for the relevant UoC.

8.3.4 CAR-related VRs may be submitted at any time.

8.3.5 Include only necessary supporting evidence that shall:

8.3.5.1 be in English or have a summary written in English.

8.3.5.2 be clear, concise with a defined link to the VR.

8.3.5.3 be made public with the VR by ASC.

8.3.6 Exceptions may be made for personal or proprietary information as defined in ASC's Privacy Policy and ASC's GDPR Data Protection Policy.

8.3.7 A summary of the confidential information shall be included in the submission and made public with the VR for transparency.

8.3.8 Not request ASC to decide compliance of a Unit of Certification (UoC) nor request approval of a corrective action to close a non-conformity raised by a CAB.

8.3.9 Indicate if the VR is related to an audit.

8.3.10 Indicate how the request meets the intent of the ASC requirement under the scope of the VR.

8.3.11 Indicate the type of request:

8.3.11.1 Variance in methodology: Request to utilise an alternative methodology than what is listed in the requirement.

8.3.11.2 Variance in requirement threshold: Request to utilise an alternative metric.

8.3.11.3 Variance – other: Requests not related to methodology or requirement thresholds.

8.3.12 Indicate a proposed scope of applicability for the VR.

9. VR Reference in Audit Reports

- 9.1** All VRs, including submissions awaiting a decision by the VR Committee, shall be referenced by VR number in the draft and final audit report.

10. Administrative Review

- 10.1** Within five days of receipt of the submission, ASC will conclude an Administrative Review of the VR.

- 10.2** The Administrative Review will evaluate the compliance of the VR submission as per Section 8.

- 10.3** If a VR fails to comply with Section 8, ASC will notify the VR applicant of the reasons for the failure.

10.3.1 The CAB may revise the submission and re-submit.

10.3.1.1 The revised VR must be re-submitted within 14 days or the VR will be closed as declined.

10.3.2 ASC will complete another Administrative Review within five days of receipt of the revised VR.

10.3.2.1 If the revised VR does not comply with Section 8, ASC will close and decline the VR.

10.3.3 If the CAB chooses not to revise the VR within the 14 days, the VR will be closed as declined.

- 10.4** Within two days of successful completion of Administrative Review, ASC will:

- Publish the VR on the ASC VR Platform
- Send confirmation of publication to the Applicant
- Begin Technical Review of the VR
- Notify stakeholders if the VR relates to an ASC Standard

11. Stakeholder Feedback - Standards-related VRs in Technical Review

- 11.1 Stakeholders must register with ASC to receive notification regarding VRs entering technical review.
- 11.2 Stakeholder feedback shall:
 - 11.2.1 Be received within 14 days of notification of Technical Review.
 - 11.2.2 Reference publicly accessible information.
 - 11.2.3 Shall be in English or a written summary of each piece of evidence shall be included in the submission in English.
 - 11.2.4 Be made publicly available with the VR on ASC's website.
 - 11.2.5 Be subject to Administrative Review as per Section 10.

12. Technical Review

- 12.1 Technical Review of a standards-related VR and any stakeholder feedback will be conducted by ASC and will last for up to 21 days following Section 10.4.
- 12.2 Technical Review of a CAR-related VR will be conducted by ASC and will last for up to 14 days following Section 10.4.
- 12.3 ASC may request additional information from the Applicant to complete the Technical Review.
 - 12.3.1 Applicant shall provide the requested additional information within 14 days.
 - 12.3.1.1 Applicant may request a 7-day extension to provide this additional information to ASC.
 - 12.3.1.2 The 7-day extension request shall be received by ASC prior to the initial 14-day period in Section 12.3.1 has ended.
 - 12.3.2 If ASC does not receive the requested additional information within 14 days or receive an extension request of an additional seven days, the VR will be closed and declined.
 - 12.3.3 If ASC does not receive the requested additional information within the 7-day extension period, the VR will be closed and declined.
- 12.4 If ASC receives the requested additional information from the Applicant in accordance with the timeline in Section 12.3.1, ASC will conclude the Technical Review within seven days of receipt.

12.5 Additional information will be made publicly available as per Section 8.3.5 – 8.3.7.

13. Presentation to the VR Committee – VR Recommendations

13.1 ASC will recommend one of the following to the VR Committee for the VR Decision:

13.1.1 To Approve – Agree that there is a rationale for a variance against the ASC requirement.

13.1.2 To not Approve – Do not agree that there is a rationale for a variance against the ASC requirement.

13.1.3 To conduct Targeted Technical Consultation – Further technical input from experts and stakeholders required to make a recommendation on a Standards-related VR.

13.1.4 To Decline – Variance request is not required, no decision to approve or not approve.

14. Presentation to VR Committee – Standards-related VRs

14.1 ASC will formulate a VR Analysis by the end of the Technical Review period for the VR Committee. The VR Analysis will include the following:

14.1.1 Recommendation to approve, not approve, decline or to conduct targeted technical consultation.

14.1.2 Rationale for the recommendation.

14.1.3 VR applicability if the recommendation is to approve the VR.

14.1.4 Any received stakeholder feedback.

14.1.5 Draft publication of the VR decision for the VR Platform.

14.2 ASC will send the VR Analysis with the VR Recommendation to the VR Committee within three days of the conclusion of the Technical Review.

15. Presentation to VR Committee – CAR-related VRs

15.1 The Technical Review team will formulate a VR Analysis for the VR Committee which will include the following:

15.1.1 Recommendation to approve, not approve or decline.

15.1.2 Rationale for the recommendation.

15.1.3 VR applicability if the recommendation is to approve the VR.

16. VR Decision

- 16.1** The VR Committee will confirm or revise the VR Recommendation within 14 days.
- 16.2** If the VR Committee requests additional information, ASC will proceed as per the timelines established in Section 12.3.

17. Targeted Technical Consultation – Standards-related VRs

- 17.1** If accepted by the VR Committee as per Section 16.1, targeted technical consultation (TTC) will be coordinated by ASC.
- 17.2** TTC will begin within seven days of confirmation by the VR Committee.
- 17.3** TTC will last for up to 21 days.
- 17.4** ASC will notify the following for TTC:
- 17.4.1** Registered stakeholders under Section 11.
 - 17.4.2** Stakeholders listed in the facility's most recent audit report.
 - 17.4.3** Other stakeholders as necessary at ASC's discretion.
- 17.5** ASC will compile all received feedback from the TTC for a second Technical Review within seven days of the TTC ending.
- 17.6** ASC will conclude the second Technical Review and formulate a second VR Analysis for the VR Committee within seven days of receiving the feedback document.
- 17.6.1** The VR Analysis will include all information as per Section 14 as well as the TTC feedback document.
- 17.7** The VR Committee will confirm or revise the VR Recommendation as per Section 16.

18. VR Decision Publication

- 18.1** Within three days of ASC receiving the final VR decision from the VR Committee, ASC will publish the VR decision on the Platform and categorise the VR as closed. This publication will include:
- The decision on whether the VR is approved, not approved or declined
 - The rationale behind the VR decision
 - The VR applicability if the VR is approved
 - Any stakeholder feedback, if the VR relates to an ASC standard
 - Any feedback received during TTC, if the VR relates to an ASC standard

18.1.1 When a VR is closed, ASC will notify the following via e-mail:

18.1.1.1 The Applicant.

18.1.1.2 All stakeholders that submitted feedback to ASC.

19. VR Applicant Requests for VR Extension or Modification – Standards-related VRs

19.1 VR Applicants may submit modification or time range extension requests of an approved VR to ASC via vr@asc-aqua.org email.

19.2 ASC will publish VR extension or modification requests in the original request on the VR Platform.

19.3 ASC will consider these requests in accordance with the processing steps and timelines in this Procedure.

19.4 ASC will notify stakeholders of VR extension or modification requests as per Section 11.

19.5 ASC will decline requests that substantially vary from the original VR and encourage the Applicant to create a new VR submission.

20. Archiving of VRs

20.1 When revised Standards or CAR become effective, ASC will archive VRs that are no longer applicable.

20.2 To facilitate the archiving process, ASC will compare the processed VRs against the criteria listed in Section 8.2.

20.3 ASC will notify CABs when a VR is archived.

20.4 CABs shall not reference archived VRs in draft or final audit reports after the VR archive date.

21. Transfer of Certificates

21.1 If a certificate is transferred to another CAB while a VR decision is pending, ASC will immediately halt the VR processing and close the VR as declined.

21.2 The succeeding CAB may re-submit the VR in accordance with this Procedure.

21.2.1 The re-submitted VR will be processed by ASC in accordance with the steps and timelines established in this Procedure.

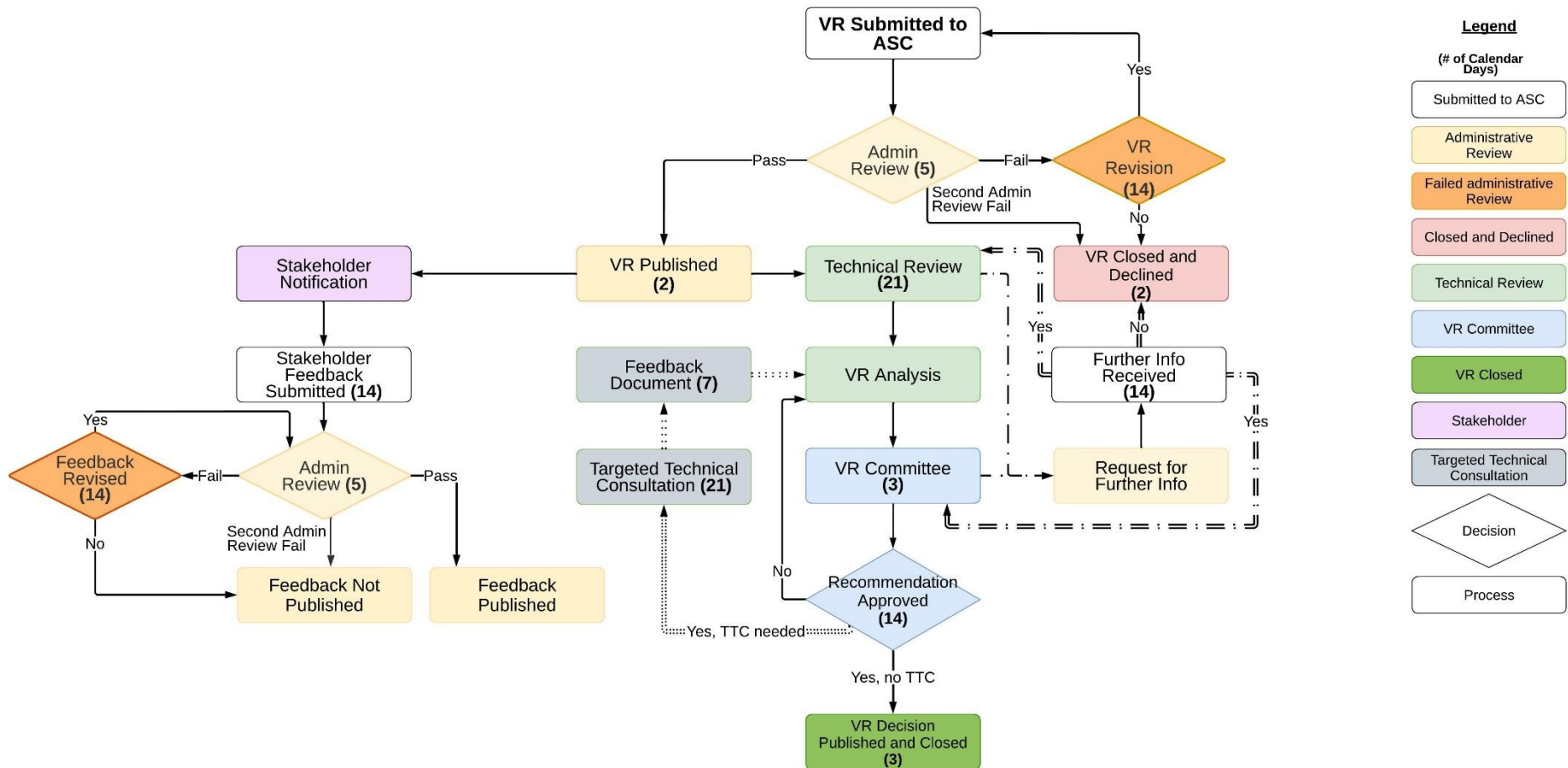
22. Withdrawal of VRs

- 22.1 The Applicant may voluntarily withdraw a VR submission at any time before a VR Decision is published as per Section 18.
- 22.2 Withdrawals shall be communicated to ASC via vr@asc-aqua.org email as soon as possible.

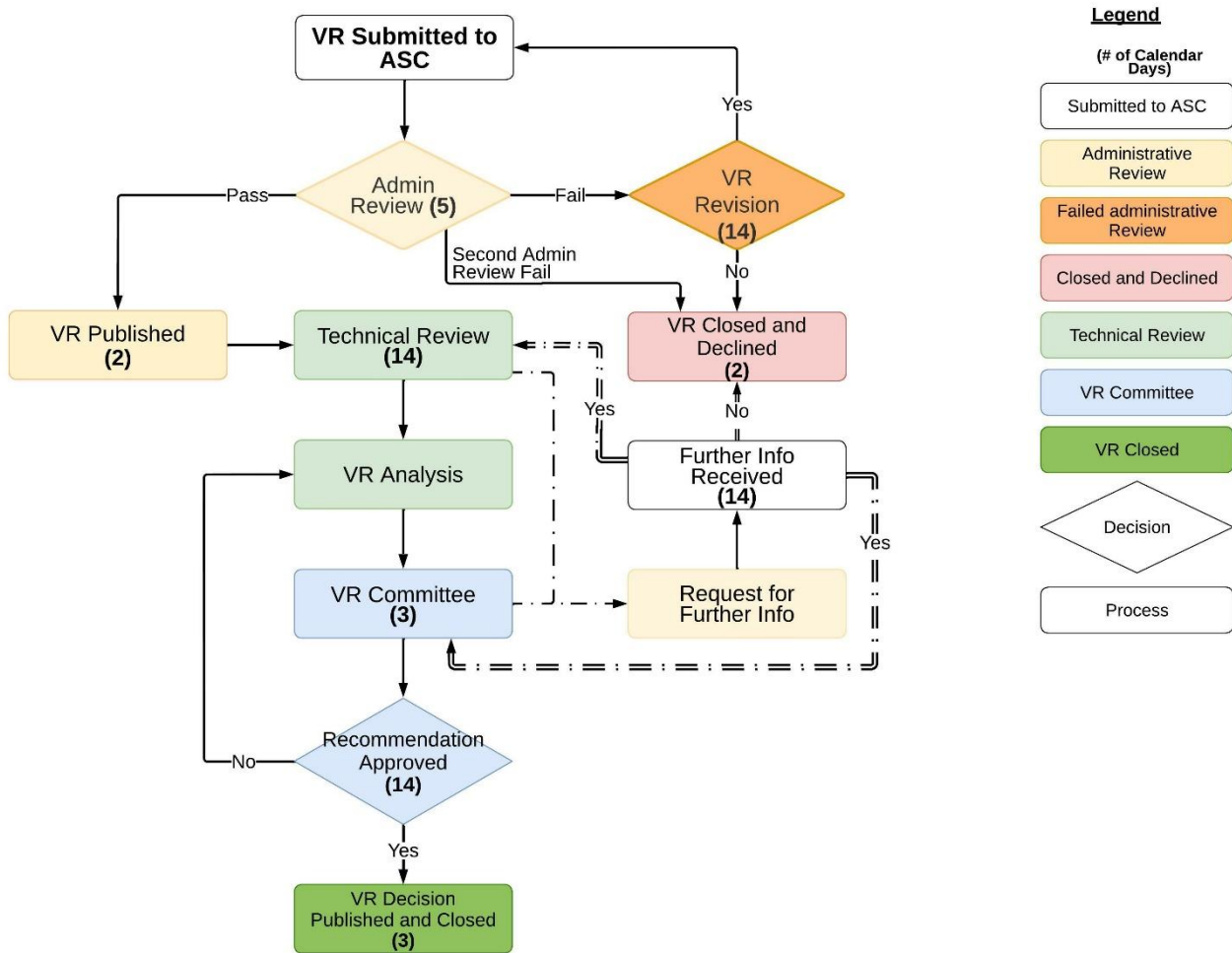
23. Stakeholder Engagement – Standards-related VRs

- 23.1 Stakeholders may submit feedback on an approved VR to ASC at any time.
- 23.2 Stakeholder feedback shall be subject to Administrative Review as per Section 10.
- 23.3 ASC may re-evaluate the applicability or approval of a VR at any time based on feedback received from stakeholders.
- 23.4 If ASC re-evaluates a VR, ASC will communicate the decision to the CAB that originally submitted the VR within three days.
 - 23.4.1 The re-evaluation of an approved VR will be processed by ASC in accordance with the steps and timelines established in this Procedure.

24. Annex 1 – Flowchart of Standards-related VR Process



25. Annex 2 – Flowchart of CAR-related VR Process



26. Amendment History

Date:	Version:	Summary of Amendment:
9 March 2023	2.0	<ul style="list-style-type: none"> • General language and phrasing for clarity • Document formatting and layout • Integration of Standards-related VR Procedure and CAR-related VR Procedure • General processing timelines and use of calendar days in all timelines <p>New Sections:</p> <ul style="list-style-type: none"> • VR Recommendations (Section 13) • VR Applicant Requests for VR Extension or Modification (Section 19) • Archiving of VRs (Section 20) • Withdrawal of VRs (Section 22) • Annex 1 – Standards VR Process • Annex 2 – CAR VR Process <p>Amended Sections:</p> <ul style="list-style-type: none"> • Terms and Definitions (Section 6) • Roles and Responsibilities (Section 7) • Submission and Formulation Requirements (Section 8) • Administrative Review (Section 10) • Stakeholder Feedback (Section 11) • Technical Review (Section 12) • Presentation to VR Committee (Section 14 and 15) • VR Decision (Section 16) • Targeted Technical Consultation (Section 17) • VR Decision Publication (Section 18) • Transfer of Certificates (Section 21) • Stakeholder Engagement (Section 23)
15 Oct 2020	1.0	New Document