Seafood Watch® Criteria for Aquaculture

Public Consultation 2 Comment Form

The ***Seafood Watch Aquaculture Sustainability Assessment Criteria*** is now available for public comment through August 2, 2015. Seafood Watch assesses the sustainability of fisheries and aquaculture by compiling relevant science-based information and evaluating that information against our standards (called 'Criteria' elsewhere on this website). We periodically revise our standards to ensure we account for developments in the scientific understanding of the ecological impacts of fisheries and aquaculture operations, as well as in our understanding of what producers and managers can do to mitigate those impacts. Seafood Watch initiated a public comment period from October 27, 2014 to January 16, 2015 and received comments from ENGO's, producers, certification schemes, and other interested stakeholders.

Key Instructions for Feedback

Individuals are asked to provide basic demographic details including Name, Organization, and Contact details below. Seafood Watch will keep official, documented information in relation to participants engaging in the 30-day public comment period, and relevant feedback/comments on the *Aquaculture Criteria*.

Page 2 and 3 include a table which enables participants to directly provide feedback in relation to the Draft Criteria. Users should type directly into the comment/feedback boxes next to the relevant Criterion and/ or Factor.

Please save all comments and send saved forms as attachments to SFWStandardReview@mbayaq.org prior to the public comment period deadline, August 2, 2015.

Registration

Please fill in all appropriate information in the boxes below. Note: unless otherwise specified, comments will be consolidated and attributed within a public summary of stakeholder feedback document.

Registration Information	
Name:	Jenna Stoner
Organization:	Living Oceans Society
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Feedback Template

Standard Criteria	*Factors*	Comment/Feedback
General Comments	*N/A*	
<u>Criterion 1 –</u> Data Availability	*N/A*	I would strongly suggest that in order to achieve a score of 10 for data then the information should be publicly available In reference to "Regulatory (laws and regulations) OR industry management measures, inclusion of zonal or cumulative impact measures, implementation structures, application and enforcement at the individual farm level": "I think 'OR' should be an 'AND'. At the very least it should be an 'and/or.'
<u>Criterion 2 –</u> Effluent	*Evidence Based Assessment*	A system with low effluent concern should be able to demonstrate effective zonal management. Suggested inclusion: "Management and/or industry best practices incorporate zonal management practices and account for cumulative impacts.
	<u>Risk Based Assessment</u> 2.1 - Waste discharged per ton of fish	
	<u>Risk Based Assessment</u> 2.2 - Management of farm-level and cumulative impacts	I think the updates to this section are very good and will help clarify the scoring of this factor immensely.
<u>Criterion 3 –</u> Habitat	*3.1 - Habitat conversion and function*	
	3.2 - Farm siting regulation and management	This explains the double weighting rationale, but I would push back on it a bit and argue that the rationale that aquaculture operations do not have control over regulatory or management effective for the fact that on the previous page you state that "regulations or management measures" include codes of practice or Best Management Schemes, which can wholly be spearheaded by aquaculture operations.

<u>Criterion 4–</u> Chemical Use	*N/A*	It remains unclear to me what is considered a 'demonstrably low need for chemical use' especially given the rationale that was added above about not identifying ecological limits, but relying on evidence of reduction in use of chemicals. Suggestion to include something for scores of moderate or above about public disclosure of chemical use at a farm level (as is required by ASC). Further explanation of what is meant by 'dependent on chemical intervention' should be provided.
<u>Criterion 5 –</u> Feed	*5.1 – Wild fish use*	In reference to "unacceptable bycatch or ecosystem impacts" in Critical scoring option: "This should be further qualified with a footnote In reference to "aquaculture operations generate or cumulatively contribute to unacceptable fishery practices": I think this point needs to be further fleshed out… I understand the spirit of the addition, but as stated provides a lot of room for subjectivity
	5.2 - Net protein gain or loss	
	5.3 – Feed Footprint	
<u>Criterion 6 –</u> Escapes	*6.1 – Escape risk score*	I understand the motivation to separate this into two method of assessment, but I have some concern that the two assessments are inconsistent with one another, as opposed to complimentary. Unsurprisingly, I try to run the example of farmed salmon through these two decision trees and get different scores. I guess in part it depends on how you assess the data availability for this criterion.
	6.2 – Invasiveness	

<u>Criterion7 –</u> Disease	*<u>Evidence Based Assessment</u>*	
	<u>Risk Based Assessment</u>	
<u>Criterion 8 –</u> Source of Stock	*N/A*	
<u>Criterion 9 –</u> Predator and wildlife mortalities	*N/A*	
<u>Criterion 10 –</u> Escape of unintentionally introduced species	*Factor 10Xa* - International or trans-waterbody live animal shipments	
	Factor 10Xb – Biosecurity of source and destination (for introduced species)	