

# Monterey Bay Aquarium Seafood Watch®

## 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](mailto: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.

<b>Registration Information</b>	
Name:	Katherine Dolmage
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Feedback Template

Standard Criteria	Factors	Comment/Feedback
<b>General Comments</b>	N/A	Illegal activities: how confident can SFW assessors be in reporting of illegal activities? If scoring is based on a “typical” farm, and illegal activities are present, activities at poor performers could be much more serious. Recommend erring on side of precaution unless very strong data shows incidents were contained and no longer occurring.
<b><u>Criterion 1 – Data Availability</u></b>	N/A	<p>While the majority of data and information should be presented in reports, consideration of proprietary data needs to be made (e.g. feed formulations)- farms should not be penalized for disallowing publishing of this information, given it is provided in confidence to assessor.</p> <p>Use of the precautionary principle when data is unavailable is valid, deferring to precautionary principle when a wealth of information is available should be avoided.</p>
<b><u>Criterion 2 – Effluent</u></b>	<i>Evidence Based Assessment</i>	Clarity required on when risk based assessment is used- previous reports with good data scores still using risk-based effluent scoring
	<i><u>Risk Based Assessment</u> 2.1 - Waste discharged per ton of fish</i>	
	<i><u>Risk Based Assessment</u> 2.2 - Management of farm-level and cumulative impacts</i>	“Note: it is considered unacceptable for farms, industries or countries that export farm-raised seafood to be less than fully transparent about the environmental management measures and regulations that control the way the exported seafood was produced.” What is “unacceptable”? Does this result in a critical?
<b><u>Criterion 3 – Habitat</u></b>	<i>3.1 - Habitat conversion and function</i>	

	<i>3.2 - Farm siting regulation and management</i>	
<b><u>Criterion 4– Chemical Use</u></b>	N/A	Scoring for this criterion is much improved from previous versions. Description of “significant” is adequate for objective scoring. Criterion describes chemical treatments as “products used in aquaculture to kill or control aquatic organisms”. Use of peroxide has been shown very effective for sea lice removal, and is without concerning environmental effects. Use of peroxide rather than veterinary medicines should be encouraged and the description should be adjusted to reflect. Footnote 30 missing from document.
<b><u>Criterion 5 – Feed</u></b>	<i>5.1 – Wild fish use</i>	
	<i>5.2 - Net protein gain or loss</i>	
	<i>5.3 – Feed Footprint</i>	
<b><u>Criterion 6 – Escapes</u></b>	<i>6.1 – Escape risk score</i>	
	<i>6.2 – Invasiveness</i>	
<b><u>Criterion 7 – Disease</u></b>	<u><i>Evidence Based Assessment</i></u>	Recommend including aspects of management of health on farms as part of scoring mechanism, such as: <ul style="list-style-type: none"> <li>- Monitoring of fish health- regular screening? Trained staff?</li> <li>- Adequate fish health management plan in place, and evidence it is followed?</li> <li>- How is disease detected and treated? Timelines?</li> <li>- What is the frequency of disease outbreaks? Is information made available?</li> </ul>

		<ul style="list-style-type: none"> <li>- What management measures are in place? Thresholds for treatment, or requirements to cull? How are these monitored?</li> <li>- Is farm level biosecurity adequate to reduce transfer to other farms or animals?</li> </ul> <p>Farms scoring highly on the above could improve disease score, while those scoring poorly would be penalized. Further, what is the long term trend? Similar to the chemical use criterion, a long term decline in high risk events could be used to improve scores, as it shows improving management.</p>
	<i>Risk Based Assessment</i>	
<b>Criterion 8 – Source of Stock</b>	N/A	
<b>Criterion 9 – Predator and wildlife mortalities</b>	N/A	
<b>Criterion 10 – Escape of unintentionally introduced species</b>	<i>Factor 10Xa – International or trans-waterbody live animal shipments</i>	
	<i>Factor 10Xb – Biosecurity of source and destination (for introduced species)</i>	