

# 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:	Anton Immink
Organization:	Sustainable Fisheries Partnership
Address:	
Email:	anton.immink@sustainablefish.org

Feedback Template

Standard Criteria	<i>Factors</i>	Comment/Feedback
<p><b>General Comments</b></p>	<p>N/A</p>	<ul style="list-style-type: none"> <li>• Scale of Assessment – Seafood Watch is not ‘required’ to conduct assessments at various scales, it ‘chooses to do so’. Also, the criteria have not been consistently applied at various scales previously because management has sometimes been considered at the assessment scale and not industry scale for individual farm assessments. I had understood that a new Management criterion would be proposed, but it does not appear in the document for consideration.</li> <li>• Where a farm has demonstrably different impacts to the ‘typical farm’ it should still be considered in the context of the cumulative impacts of the overall industry. This is mentioned in some criteria, but not consistently.</li> <li>• The issue of illegality should be addressed through understanding of the regulatory framework and the overall industry compliance with the management regime. If non-compliance can be shown to have minimal environmental impact (event at cumulative levels) then potentially SFW could discount it for the purpose of this assessment, but a more constructive route would be for the industry to work with local regulators to legalise the issue – rather than SFW going down the route of ‘condoning’ illegal activities.</li> </ul>
<p><b>Criterion 1 – Data Availability</b></p>	<p>N/A</p>	<p>Data table 2, Disease – should include regulatory approaches to disease minimization and industry/regulatory preparedness for emergency outbreak control, including enforcement</p>

<b>Criterion 2 – Effluent</b>	<i>Evidence Based Assessment</i>	
	<i>Risk Based Assessment 2.1 - Waste discharged per ton of fish</i>	
	<i>Risk Based Assessment 2.2 - Management of farm-level and cumulative impacts</i>	
<b>Criterion 3 – Habitat</b>	<i>3.1 - Habitat conversion and function</i>	The weighting of Criterion 3 in favour of 3.1, therefore reducing the importance of the management regime, continues to give precedence to the idea that the actions of farms are more important than an overall (effective) management system that takes more of an ecosystem view/approach. I would suggest these two issues were given equal weighting, especially as the overriding reasoning for the habitat impact argument is the cumulative impact of an industry rather than of individual farms.
	<i>3.2 - Farm siting regulation and management</i>	
<b>Criterion 4 – Effluent Chemical Use</b>	N/A	Scores appear primarily focused on the performance of individual production systems and farms rather than a management system and overall cumulative impacts. Suggest a review of this criterion. An effective management system only scores 4.
<b>Criterion 5 – Effluent Feed</b>	<i>5.1 – Wild fish use</i>	
	<i>5.2 - Net protein gain or loss</i>	
	<i>5.3 – Feed Footprint</i>	
<b>Criterion 6 – Escapes</b>	<i>6.1 – Escape risk score</i>	When a farm uses a different production system, it should still be considered in the context of the wider industry (per the introductory guidance), rather than the guidance given specifically in this section.
	<i>6.2 – Invasiveness</i>	

<b><u>Criterion 7</u> – Disease</b>	<i><u>Evidence Based Assessment</u></i>	The disease criterion continues to focus on the physical production system rather than the management system; and the impact of pathogens and parasites on external populations rather than how disease is managed/controlled between aquaculture production sites. In all cases the siting of farms based on reducing pathogen and parasite impacts within a planned industry should be given consideration in the scoring.
	<i><u>Risk Based Assessment</u></i>	
<b><u>Criterion 8</u> – Source of Stock</b>	N/A	
<b><u>Criterion 9</u> – Predator and wildlife mortalities</b>	N/A	
<b><u>Criterion 10</u> – 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>	