

From: _____
To: [SEW Standard Review](#)
Cc: _____
Subject: _____
Date: _____
Attachments: _____

Good morning,

Please find attached our standards review for Seafood Watch Aquaculture standards.

A couple comments.

1. The standards appear to be shifting towards punitive, and away from structured guidance and encouragement to adopt improved practices. For many of these standards, it appears that there is no opportunity for companies to improve under the MBAq program without either development and implementation of regulatory programs an industry may have no control over, or significant scientific study which may then be shot down as tied too close to industry, not local enough, broad enough, or taking into account all of the many variables in a changing and dynamic environment.
2. I strongly encourage Seafood Watch to reconsider the shift in weight now appropriated to community concerns that have no scientific basis, or in our case, science which has been continually found lacking by the courts. As the shorelines in the United States become more developed, the friction between farming and residents will grow. If there is a desire to include conjecture viewpoints, I encourage reviewers to allow farms to view the concerns put forth and under consideration and allow response prior to a decision.

Respectfully,
Erin

Erin Ewald
Assistant Director of Regulatory
& Environmental Compliance



130 SE Lynch Rd., Shelton, WA 98584
W: (360) 432-3348 | C: (253) 606-2585
taylorshellfish.com | tayloroysterbars.com

Monterey Bay Aquarium Seafood Watch®

Seafood Watch® Standard for Aquaculture

Please include your contact details below

All documents submitted during the public consultation process will be posted on our website. Documents will be posted exactly as we receive them except that this front page will be removed. The organization/author field below will be displayed as the 'author' of the online posted document. **If you wish for your document to remain anonymous, please indicate in the check box below.** If 'Anonymous' is selected, the 'author' of this document when posted on our website will then simply read 'Anonymous.'

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Monterey Bay Aquarium Seafood Watch®

Seafood Watch® Standard for Aquaculture

Public Comment Period – 2

Introduction

The Monterey Bay Aquarium is requesting feedback on the Seafood Watch Aquaculture Standard during our current revision process. Before beginning this review, please familiarize yourself with all the documents available on our [Standard review website](#).

The goal of the public comment period is to gather feedback on revision proposals and options meant to improve the current version of the Seafood Watch Standard.

Providing feedback, comments and suggestion

This document contains the current version of the Seafood Watch Aquaculture Standard. Proposed revisions are tracked throughout, and a number of “Guidance for public comment” boxes highlight the significant changes by criterion. These are the primary areas we are seeking public comment on during this final public consultation during the current revision cycle. That said, Seafood Watch welcomes feedback, and particularly suggestions for improvement, on any aspect of the criteria from specific calculations to the structure of individual criteria. Seafood Watch also welcomes feedback on the broader approach taken with respect to the principles, definitions, and assessment of sustainable aquaculture. Please feel free to comment on any section of relevance to your expertise, and in general:

- Please provide solutions or suggestions for improvement wherever possible.
- Please support your feedback with references wherever possible.
- Please suggest additional experts to contact wherever possible.

Before beginning this review, please familiarize yourself the documents available on our standard review website, and with the Seafood Watch ratings and guiding principles for farm-raised seafood below.

Seafood Watch Ratings and Guiding Principles

Assessments to the Seafood Watch Aquaculture Standard result in a Seafood Watch rating of Best Choice (green), Good Alternative (yellow), or Avoid (red). The assessment criteria are used

to determine a final numerical score and color rating for each criterion. These scores are calculated to achieve a final Seafood Watch color rating according to the methodology described in the table below. The table also describes how Seafood Watch defines¹ each of these categories. The narrative descriptions of each Seafood Watch color rating category, and the guiding principles listed after the table of contents in this document, compose the framework the criteria are based on, and should be considered when providing feedback on any aspect of the criteria.

¹ The first seven criteria are scored from 0 to 10 as described in the document below. Criteria scoring <3.3 are considered “red” criteria for Criteria 1-7. The remaining three criteria (8X, 9X, 10X) are scored deductively from 0 to -10. For those scored deductively, score of >6.6 indicates a “red” criterion.

Seafood Watch® Standard for Aquaculture

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Introduction

The Monterey Bay Aquarium is committed to inspiring conservation of the oceans. To this end, Seafood Watch®, a program of the Monterey Bay Aquarium, researches and evaluates the environmental impact of aquaculture products and shares these seafood recommendations with the public and other interested parties in several forms, including regionally specific Seafood Watch pocket guides, smartphone apps and online at www.seafoodwatch.org.

This document houses the Seafood Watch Standard for Aquaculture as approved on September 30, 2015 by the Seafood Watch Multi-Stakeholder Group. The Standard allows assessment of the relative sustainability of aquaculture operations according to the conservation ethic of the Monterey Bay Aquarium. It includes background and rationale text explaining how the assumptions and Seafood Watch values are reflected within the calculations and scoring options. Wild seafood sources are evaluated with a different standard. Both the Standard for Aquaculture and the Standard for Fisheries, in addition to our assessment process, assessments and recommendations, are available at www.seafoodwatch.org.

This Standard will be used for all aquaculture assessments beginning January 1 2016, and consists of:

1. Defined guiding principles
2. Science-based performance criteria that are regularly revised based on the input from aquaculture experts
3. A robust and objective scoring methodology that that results in a transparent assessment of an aquaculture operation against the performance criteria

Assessing against the Seafood Watch Standard for Aquaculture results in a Seafood Watch rating of Best Choice (green), Good Alternative (yellow), or Avoid (red). The assessment criteria are used to determine a final numerical score as well as numerical sub-scores and color ratings for each criterion. These scores are translated to a final Seafood Watch color rating according to the methodology described in the table below. The table also describes how Seafood Watch defines each of these categories.

Best Choice	Final Score $\geq 6.66^2$ and ≤ 10 , and no Red Criteria, and no Critical ³ scores	Wild-caught and farm-raised seafood on the “Best Choice” list are ecologically sustainable, well managed and caught or farmed in ways that cause little or no harm to habitats or other wildlife. These operations align with all of our guiding principles.
Good Alternative	Final score ≥ 3.331 and ≤ 6.66 , and no more than one Red Criterion, and no Critical scores.	Wild-caught and farm-raised seafood on the “Good Alternative” list cannot be considered fully sustainable at this time. They align with most of our guiding principles, but there is either one conservation concern needing substantial improvement, or there is significant uncertainty associated with the impacts of this fishery or aquaculture operations.

² Each criterion is scored from 1 to 10 based on sub-factor scores, as described in the document below. Criteria scoring < 3.3 are considered “red” criteria.

³ Very severe conservation concerns receive “Critical” scores, which result in an Avoid recommendation.

Avoid	Final Score ≥ 0 and ≤ 3.33 , or two or more Red Criteria, or one or more Critical scores.	Wild-caught and farm-raised seafood on the “Avoid” list are caught or farmed in ways that have a high risk of causing significant harm to the environment. They do not align with our guiding principles, and are considered unsustainable due to either a Critical conservation concern, or multiple areas where improvement is needed.
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Seafood Watch Guiding Principles for Aquaculture

Seafood Watch® defines “sustainable seafood” as seafood from sources, whether fished or farmed, that can maintain or increase production without jeopardizing the structure and function of affected ecosystems.

Sustainable aquaculture farms and collective industries, by design, management and/or regulation, address the impacts of individual farms and the cumulative impacts of multiple farms at the local or regional scale by:

1. Having robust and up-to-date information on production practices and their impacts available for analysis;

Poor data quality or availability limits the ability to understand and assess the environmental impacts of aquaculture production and subsequently for seafood purchasers to make informed choices. **Robust and up-to-date information on production practices and their impacts should be available for analysis.** 

2. Not allowing effluent discharges to exceed, or contribute to exceeding, the carrying capacity of receiving waters at the local or regional level;

Aquaculture farms minimize or avoid the production and discharge of wastes at the farm level in combination with an effective management or regulatory system to control the location, scale and **cumulative impacts** of the industry’s waste discharges. 

3. Being located at sites, scales and intensities that maintain the functionality or ecologically valuable habitats;

The siting of aquaculture farms does not result in the **loss of critical ecosystem services** at the local, regional, or ecosystem level. 

4. Limiting the type, frequency of use, total use, or discharge of chemicals to levels representing a low risk of impact to non-target organisms;

Aquaculture farms avoid the discharge of **chemicals toxic** to aquatic life or limit the type, frequency or total volume of use to ensure a low risk of impact to non-target organisms. 

5. Sourcing sustainable feed ingredients and converting them efficiently with net edible nutrition gains;

Producing feeds and their constituent ingredients has complex global ecological impacts, and the efficiency of conversion can result in net food gains or dramatic net losses of nutrients. Aquaculture operations source only sustainable feed ingredients or those of low value for human consumption (e.g. by-products of other food production), and convert them efficiently and responsibly.

6. Preventing population-level impacts to wild species or other ecosystem-level impacts from farm escapes;

Aquaculture farms, by limiting escapes or the nature of escapees, prevent competition, reductions in genetic fitness, predation, habitat damage, spawning disruption, and other

impacts on wild fish and ecosystems that may result from the escape of native, non-native and/or genetically distinct farmed species.

7. Preventing population-level impacts to wild species through the amplification and retransmission, or increased virulence of pathogens or parasites;

Aquaculture farms pose no substantial risk of deleterious effects to wild populations through the amplification and retransmission of pathogens or parasites, or the increased virulence of naturally occurring pathogens.

8. Using eggs, larvae, or juvenile fish produced from farm-raised broodstocks thereby avoiding the need for wild capture;

Aquaculture farms use eggs, larvae, or juvenile fish produced from farm-raised broodstocks thereby avoiding the need for wild capture, or where farm-raised broodstocks are not yet available, ensure that the harvest of wild broodstock does not have population-level impacts on affected species. Wild-caught juveniles may be used from passive inflow, or natural settlement.

9. Preventing population-level impacts to predators or other species of wildlife attracted to farm sites;

Aquaculture operations use non-lethal exclusion devices or deterrents, prevent accidental mortality of wildlife, and use lethal control only as a last resort, thereby ensuring any mortalities do not have population-level impacts on affected species.

10. Avoiding the potential for the accidental introduction of secondary species or pathogens resulting from the shipment of animals;

Aquaculture farms avoid the international or trans-waterbody movements of live animals, or ensure that either the source or destination of movements is biosecure in order to avoid the introduction of unintended pathogens, parasites and invasive species to the natural environment.

Seafood Watch Criteria and Scoring Methodology for Aquaculture

Aquaculture is the process of converting resources from one form to another more desirable form via aquatic animals and plants. This definition is intended to highlight the importance of efficiency of conversion of resources used to produce farmed aquatic animals and plants. The end product may be more desirable than the raw resources economically, however there are environmental costs associated with this conversion, and complex social and economic costs and benefits as well. The environmental impact of this conversion is the basis for all Seafood Watch aquaculture assessments, and is the reason we choose this definition of aquaculture. The long-term sustainability of aquaculture depends on a balance and synergy of these costs and benefits. Overall, maximizing the social and economic benefits of aquaculture continues to be the driver for, and focus of, both subsistence and industrial production. These criteria focus on the environmental aspects of aquaculture and provide a tool to assess and highlight the ecological impacts and costs, thereby helping to inform and understand the ecological sustainability of different aquaculture systems. Seafood Watch recognizes the growing importance of social issues and is working to understand how we may include critical social issues as part of our recommendations in the future. We are currently trialing some options that would allow us to recognize the work of others in our process.

Scope

These criteria can be applied to all aquaculture species and production systems at all scales including those involving multiple species (hereafter termed ‘polyculture’ and inclusive of all multi-species and multi-trophic systems). While the standard criteria can be applied to individual farms, Seafood Watch assessments apply the standards only at a regional, national or international level. ~~from individual farms to regional, national and international industries.~~

Reference is made to ‘fish’ throughout for clarity, with the recognition that this term applies to all species of fish, shellfish, crustaceans and aquatic plants.

Scale of Assessment

~~Seafood Watch conducts assessments at a variety of scales from individual farms to country level industries. The criteria are applied consistently across these scales depending on the data that are available. For all scales of assessment their relative contributions to the cumulative impacts of neighboring farms and the larger scale industry are addressed where relevant.~~

Criterion 1 - Data

Impact, unit of sustainability and principle

- *Impact:* Poor data quality and availability limits the ability to assess and understand the impacts of aquaculture production. It also does not enable informed choices for seafood purchasers or enable businesses to be held accountable for their impacts.
- *Unit of sustainability:* The ability to make a robust sustainability assessment.
- *Principle:* Having robust and up-to-date information on production practices and their impacts publicly available.

Request for Comment

Please review the following changes marked as Tracked Changes in the scoring table and calculation:

1. Some language has been modified to clarify existing intent
2. The option for ‘NA’ as a score in Data Table 2 has been removed
3. The ‘Energy Use’ category has been removed from Data Table 2, as it is not currently used in Seafood Watch assessments.

Comment:

Background and Rationale

~~Aquaculture frequently operates in the public domain or “the commons”, but farm level records, independent monitoring data, and industry production data are typically sparse or unavailable unless aggregated or anonymous. While Freedom of Information claims allow access to some sources, the ability to make informed environmental performance assessments of these industries is often limited.~~

The Data Criterion ~~is intended to reward~~recognizes those ~~responsible~~ companies, industries and regulators that make good quality data on their activities and impacts available, or those operations that are well researched ~~(accepting that research may be focused on some of the worst impacts or performers)~~. It is understood that not all areas of data will be applicable to each assessment; in these cases, a “not applicable” option is available that avoids penalizing assessments for not having data that are not relevant to the particular industry/region under assessment. ~~The calculation determining the final Data Criterion score will reflect only the number of applicable data categories.~~

Seafood Watch will use data that are publicly available or provided privately. Data and information used to justify a score, or interpretations of it, will be included in the report and published.

~~Data quality and availability are addressed in this criterion as well as individually in key areas of several of the other criteria through the use of low scores for “unknown” information.~~ The practice of assigning low scores in the event that information is “unknown” adheres to

Seafood Watch's use of the Precautionary Principle⁴ when there is potential for a significant⁵ substantial impact, but information is not available.



~~*Note:~~ The absence of data showing impact does not equate to no impact. (i.e., "No evidence of impact" is not the same as "Evidence of no impact.")

Assessment scale

- ~~— Farm-level assessments — apply this criterion to the farm being assessed, or at a broader level, where relevant (e.g., regulations or enforcement).~~
- ~~— Regional or national assessments — apply to regional or national statistics, or relevant impacts. Use "typical" or "average" farms within the region or country, where necessary.~~

For each of the data categories in Table 2, use the Data Quality and Confidence descriptions in Table 1 to select the appropriate 0-10 Data Quality and Confidence score for each data category. Examples of data quality are provided to determine how effectively the available data or evidence represent the operation and its impacts. While every eventuality may not be covered in the table, use the examples as guidelines to determine the most appropriate score.

Data -Table 1

Quality	Examples of Data Availability, Quality and Confidence	Score
High	Assessor confidence is high that the operation and its impacts are fully understood, examples include: ▪ Independently verified, peer-reviewed research, official regulatory monitoring results or government statistics ▪ Complete, detailed, and available without averaging or aggregation ▪ Up to date within reason, and covering relevant timeframes ▪ Collected using appropriate methods (e.g., frequency of collection, number of data points, etc.)	10
Moderate-high	Data are considered to give a reliable representation of the operation(s) and/or impacts examples include: ▪ Data quality does not meet the 'High' standards above but are complete and accurate in relation to this assessment ▪ Up to date within reason, and covering relevant timeframes; data gaps may be present but are non-critical ▪ Some non-critical aggregation or averaging may have taken place ▪ Data collection methods (e.g., frequency of collection, number of data points, etc.) are considered robust	7.5

⁴ The use of the Precautionary Principle is not intended to be a blanket response to a lack of information. In a scenario with a potential impact but unknown information, if evidence shows that the risk of the impact is low, Seafood Watch will apply a common sense approach to the scoring of an assessment, rather than a "worst case scenario" Precautionary Principle approach. The Seafood Watch Aquaculture Standard is intended to be functional and produce relatively accurate results in the face of low data. It has been developed as a risk assessment for impacts based on proxies for impact (e.g. openness of a production system as a proxy for impact of disease on wild populations because pathogen/parasite impact to wild populations is generally unknown).

~~⁵ Generally refers to population level impacts (as opposed to impacts to individual animals).~~

Moderate	<u>Data provide some useful information, but the assessor (subjectively) is uncertain whether data fully represent the farming operations</u> - Data may not be verified - Some loss of relevant information may have occurred through data gaps, averaging or aggregation - Data collection methods are questionable or unknown. - Questions or uncertainties remain in key information	5
Low-moderate	<u>Data provide little useful information and are not sufficient to give confidence that the operation and its impacts are well understood</u> - Data probably not verified - Weaknesses in time frames or collection methods; data gaps or aggregation and averaging mean that critical interpretation is not possible - Questions and uncertainties about the data mean it is difficult or impossible to draw reliable conclusions	2.5
Low	<u>Data do not provide useful information and are not considered to represent the operation(s) and/or impacts</u> Data are incomplete or out of date, unverified, or collection methods are inappropriate	0

Data – Table 2

Category	Data Description	Score 0-10 or n/a
Production	Industry or farm size and production volumes, species, number and locations of farms or sites, general production methods	
Management	National, regional, and local laws and regulations and/or industry management measures ⁶ , inclusion of area-based or cumulative impact measures, implementation and enforcement at the individual farm level	
Effluent	Water quality testing, impact monitoring, regulatory control and enforcement Water quality and benthic impact monitoring, regulatory control and enforcement.	
Habitat	Farm locations, habitat types, impact assessments, history of conversion, habitat monitoring, habitat/siting regulatory content and enforcement. Farm locations, habitat types, impact assessments, history of conversion, habitat monitoring, habitat regulatory control and enforcement	
Chemical <u>Uses</u>	Type, frequency, dose and discharge characteristics, impact monitoring, regulatory restrictions	

⁶ It is not required that laws, regulations and management measures be provided in English. However if translation capability is limited, the Management category of the Data criterion must be scored in a way that reflects the analyst's ability to understand the content of the documents in order to determine their relative importance to the assessment, and robustness of their content.

Feed	eFCR, inclusion rates of fishmeal and oil (including by-products) and of other ingredient groups ² (vegetable or crop meals and oils, land animal products and by-products). <u>Source and sustainability of fisheries supplying marine ingredients</u>	
Escapes	Numbers and size of animals, recapture or survival rates, impacts of escapees	
Disease	Disease outbreaks, mortalities, pathogen and parasite levels and treatments, biosecurity characteristics, monitoring or evidence of impacts, regulations and emergency responses	
<u>Source of stock</u>	Source of farm stocks, use of wild fisheries for broodstock, larvae or juveniles.	
<u>Predators Wildlife mortalities</u>	Predator and wildlife mortality rates and evidence of population impacts.	
<u>Introduced Escape of secondary species</u>	International or trans- Trans-waterbody live animal movements, species and domestication status, biosecurity of sources and destinations	
<u>Energy Use</u>	<u>Electricity, fuel use, etc.</u>	
Total Score		

$$\text{Data Criterion Score} = \left(\frac{\text{Total}}{112 - \text{sum}(n/a)} \right)$$

Final ~~D~~ata ~~C~~riterion score = _____ (range 0–10)

Criterion 2 - Effluent

Impact, unit of sustainability and principle

- *Impact:* Aquaculture species, production systems and management methods vary in the amount of waste produced per unit of production. The combined discharge of farms, groups of farms or industries contribute to local and regional nutrient loads.
- *Unit of sustainability:* The carrying or assimilative capacity of the local and regional receiving waters ~~beyond the farm or its allowable zone of effect.~~
- *Principle:* Not allowing effluent discharges to exceed, or contribute to exceeding, **the carrying capacity of receiving waters at the local or regional level.** 

² ~~Seafood Watch recognizes the proprietary nature of feed formulations and does not expect these to be made available, but data on basic inclusion levels of key ingredient groups is an essential starting point for assessing feed sustainability.~~

Request for Comment

We have made changes to Criterion 2 in the following ways:

1. In the current version of the Standard, effluent discharges from net pens that impact the benthos within an allowable zone of effect (AZE) are considered in Criterion 3 – Habitat. Here, we are proposing all effluent discharges from farms (including those from net pens) are considered in Criterion 2 – Effluent, regardless of the distance from the farm their impacts may be observed. The intent of Criterion 2 is to assess the cumulative nutrient- or other effluent-related impacts of the industry under assessment on the waterbody/ies in which it is sited or that receive its effluent.
2. Inserted guidance for assessing polyculture (including multi-trophic) systems in the Risk-Based Assessment. The intent of this guidance is to ensure basic nutrient dynamics associated with multi-species systems can be accounted for in the calculation of likely impact from discharges of such systems.

Please provide comment on:

1. The proposed modifications to the Evidence-Based Assessment option that aim to more comprehensively assess the impacts of effluent-related discharge at all distances from the farm footprint.
2. The guidance inserted for polyculture systems in the Risk-Based Assessment, as it pertains to accounting for broad nutrient dynamics and their impacts on effluent specific to polyculture systems.

Comment:

Background and Rationale

The effect of effluent wastes on receiving water bodies is typically related to the total amount of pollutants added over time relative to the carrying capacity of the receiving waters, and not on the concentration of the pollutants, except in situations where concentrations are high enough to have localized impacts (Boyd et al. 2007). The impact of aquaculture wastes, and particularly their contribution to the overall local or regional impacts from all waste sources (i.e. agriculture, domestic waste and so on) varies enormously and is challenging to assess.

This criterion applies to the impacts or risk of impacts from effluent (typically nutrient-related) discharges from farms in the industry under assessment. These 'operational' impacts are different from those related to initial farm construction and farms' physical presence in a space; those impacts (e.g. the mooring of floating net pens, or the construction of ponds) are assessed effluent effects outside the farm boundary or beyond an allowable zone of effect. Effluent impacts within the farm's boundary, immediate area or allowable zone of effect are addressed in Criterion 3 – Habitat. Effluent-related impacts are more likely in the immediate vicinity of the farm or its discharge point, and as such, regulatory or management bodies often govern aquaculture effluent using the concept of an 'allowable zone of effect' (AZE). The allowance of varying degrees of impact at varying distances from farms is acknowledged in this criterion, but the intent is to assess the cumulative impact of all effluent discharges on the industry's receiving waterbody/ies.

While it would be preferable to make a direct measurement of effluent impacts resulting from farm discharges, this is generally impossible. The impact is typically not directly related to either the waste produced per ton of fish, the total waste produced by a farm, or the concentration of a pollutant in the wastewater discharged. For example, a small farm can be highly polluting, while a large farm could have a minimal impact. Similarly, a well located and appropriately sized farm could have no impact and a poorly located or poorly sized farm could have a significant⁸ impact.

The Effluent criterion therefore uses direct evidence of impacts (or lack of impact) where possible (in the evidence-based assessment option) or a combination of risk factors as outlined below (in the risk-based assessment) to assess the potential for the assessed operations to exceed the carrying capacity of the receiving waters. The Effluent Criterion primarily focuses on soluble and particulate fish wastes but can also include plastics, feed bags, nets, ropes, etc. where relevant.

Evidence-Based Assessment

The Evidence-Based Assessment is the preferred method of assessment when good research and/or data are available to demonstrate the level of impact (or lack of impact) from effluent wastes. This allows aquaculture operations that can demonstrate that they are operating responsibly to get a good score, and also enables conclusive data or other research evidence on impacts (good or bad) to be the basis of the score.

A Critical score is included in the table to recognize extreme impacts where effluent leads to population-level declines in key species beyond the immediate farm area, or persistent illegal activities take place that contribute to negative ecological impacts (e.g. illegal sludge dumping from ponds contributing to cumulative impacts to a waterbody).

⁸ In this scenario “significant” can refer to the farm or industry’s contribution to cumulative impacts to the receiving waterbody, or it can refer to the farm or industry’s impacts that impact wild, native populations beyond the farm site (i.e. effluent may not have an impact cumulatively, but **impacts are still occurring** at a smaller scale). 

Risk-Based Assessment

The Risk-Based Assessment option is based on the amount of waste discharged per ton of production combined with the effectiveness of the management or regulatory structure to control the total farm discharge and the cumulative impact of multiple farms impacting the same receiving water body.

Factor 2.1

While phosphorous may be the main driver of impacts in some environments, particularly freshwater, this criterion uses nitrogen as a proxy indicator of waste due to the ease of calculation based on the greater availability of data for the nitrogen in the protein component of feed or as fertilizer.

The calculation for the amount of nitrogen discharged from the farm (per ton of production) is based on the amount of waste nitrogen produced by the fish (Factor 2.1a), and then the percentage of that waste that actually leaves the farm site (Factor 2.1b). The nitrogen input calculation adds the nitrogen in feed (if used) to the nitrogen in fertilizer (if used) to determine the total kg of nitrogen required to produce one ton of fish. The nitrogen output is determined by the nitrogen available (as protein) in harvested farmed fish. The nitrogen output is then subtracted from the nitrogen input to determine the amount of waste nitrogen produced per ton of farmed fish as effluent.

The percentage of wastes produced by fish that leaves the farm (Factor 2.1b) is calculated such that a score of 1 means 100% of the waste produced by the fish is discharged from the farm; a score of zero means 0% of the waste produced by the fish is discharged from the farm (e.g., a system that assimilates, collects, treats or otherwise appropriately disposes of all wastes).

Adjustments are available for most types of systems to account for different methods of effluent treatment. For example, while fully enclosed recirculation systems do not discharge effluent water from the system, there is removal and disposal of solid wastes from the system which, if disposed of inappropriately, can impact surrounding ecosystems. However, there are adjustments that can be applied if it is known that proper disposal of solids is occurring. Therefore, combinations of different adjustments allow the system discharge score to be zero when all effluent wastes are disposed of appropriately.

For ponds or other systems, Hargreaves (1998), Gross et al. (2000), Jackson et al. (2003), Boyd et al. (2007), and Sonnenholzer (2008) have been the primary data sources (and they largely agree both across studies and across species). For example, Boyd et al. (2007) show 16% N loss in effluent from catfish ponds compared with 17% for shrimp from Sonnenholzer (2008), and 22.6% for sediment accumulation compared to 24% respectively (see Figure 1).

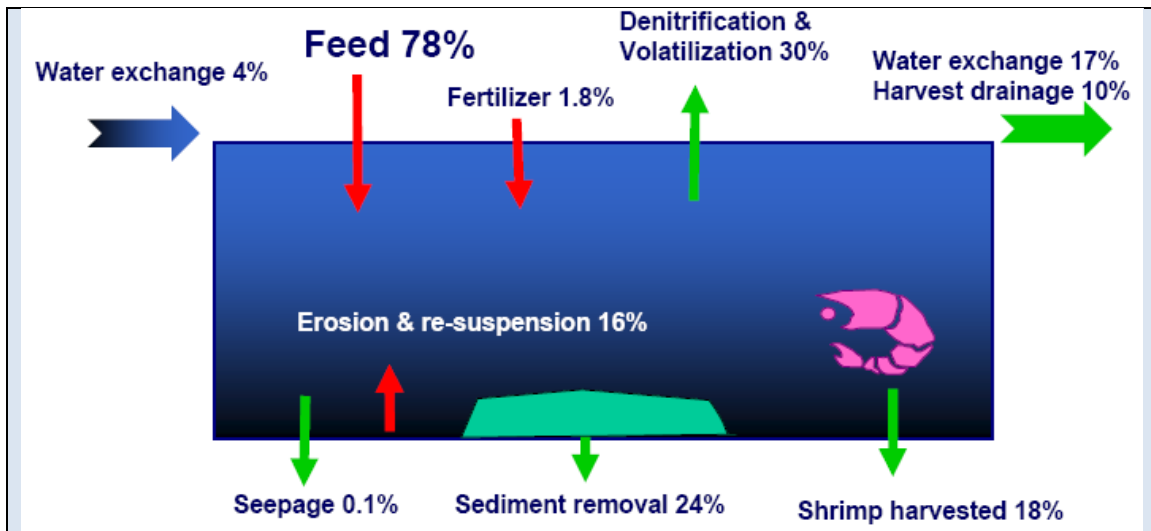


Figure 1 – Shrimp pond nitrogen dynamics, from Sonnenholzer (2008).

The Factor 2.1b scores for ponds are based on Figure 1. The waste outputs with the potential to cause effluent impacts are water exchange (17%) plus harvest drainage (10%) and sediment removal (24%), totaling 51%. This (0.51) is therefore the basic score for daily exchanging ponds (i.e. 49% of the waste produced by the fish is broken down in the pond). Evidence of further waste treatments allow for the reduction of this score according to collection or other appropriate disposal method of the wastes. For example, settling ponds will treat the great majority of the 17% lost in water exchange (therefore the adjustment for the use of settling ponds is -0.17). Similarly, appropriate disposal of pond sludge / sediment allows an adjustment of -0.24.

Tanks and raceways have the potential for 100% of wastes to be discharged; therefore, the basic score is 1. Adjustments allow for the collection or treatment of solid and soluble wastes on the basis of 20% solids, 80% soluble (Roque D'Orbcastel et al. 2008, Schulz et al. 2003).

For net pens, 80% of the waste leaving the production system is soluble effluent waste and the remaining 20% is solid waste that falls below the net pen (Islam 2005, Reid et al. 2009). Impacts from this waste are addressed in the Habitat criterion (Criterion 3). Therefore the Basic Score for net pens is 0.8 (or 80%).

Factor 2.2

The above waste score (Factor 2.1) is on a "per ton of production" basis, and therefore does not directly measure the total amount of waste discharged from one or more farms, or the impacts of these wastes. Even aquaculture operations that produce a lot of waste per ton of production can have a minimal overall impact if the farm's size and location, or the concentration and connectivity of multiple farms are well managed or regulated. Similarly, aquaculture operations that discharge relatively small amounts of waste per ton of production could have substantial impacts if the farms are large and/or concentrated.

Factor 2.2 is a measure of the presence and effectiveness of laws, regulations, management control measures, farm-level practices or eco-certification (appropriate to the scale of the industry) to limit the total discharge of wastes from farms and the cumulative impacts of aquaculture effluent from multiple farms to within the carrying capacity of the receiving environment.

Factor 2.2a – Content of effluent management measures - is intended to assess the strength of management systems in place that regulate aquaculture operations. Seafood Watch considers regulatory systems that manage impacts according to area-based management practices or cumulative impacts to be most appropriate for addressing impacts from aquaculture industries. It is possible for aquaculture operations that produce a lot of waste per ton of production to have a minimal overall impact if the farm's size and location, or the concentration and connectivity of multiple farms are well managed or regulated. Similarly, aquaculture operations that discharge relatively small amounts of waste per ton of production could have substantial impacts if the farms are large and/or concentrated.

Factor 2.2b – Enforcement of effluent management measures - is intended to assess the enforcement and applicability of management systems in place. If a management system exists but is not being enforced, it is not considered to be effective.

Note: "Management system" refers to policies, legislation or regulations, and/or independently verified management measures, codes of practice, Best Management Practices or certification schemes that have the appropriate language⁹ and authority for enactment.

The final scoring table for the Effluent Criterion is constructed to recognize the importance of the different characteristics described above. For example, even with very high effluent loads per ton of production, impacts can be minimal if the total discharge is managed effectively. The final score includes a Critical option when the score is zero due to a combination of high waste discharges per ton of production and very weak regulations or management to control the total waste discharge or cumulative impacts.

Area of assessment for Effluent

This criterion applies to effluent impacts at all locations proximal and distant to the farm. effects outside the farm boundary or beyond an allowable zone of effect. Impacts within the farm's boundary, immediate area or allowable zone of effect are addressed in Criterion 3 – Habitat. While relevant distances or boundaries of AZEs will vary, 30m is suggested as an initial distance for this assessment unless other information is available.

For example:

- For net pen farms, Criterion 2 – Effluent applies within and beyond the edge of the net pens (initially suggested as 30 m from the edge of the pens), or beyond an their Allowable Zone of

⁹ Appropriate language – avoidance of 'should', 'minimize', etc.

Effect (AZE). It applies to both benthic and water column impacts. ~~Criterion 3 – Habitat applies to benthic impacts under the net pens and within 30 m or the AZE.~~

- For pond farms, Criterion 2 – Effluent applies within and beyond the farm boundary or discharge point, and includes activities such as pond sludge disposal.

Choosing the Evidence-Based or the Risk-Based Assessment

This criterion has two assessment options based on the quality of the effluent data available:

- If good research information and/or data on the ecological impacts are available (i.e. a Criterion 1 – Data score of 7.5 or higher for the Effluent category), use the Evidence-Based Assessment table.

If the assessed operations do not have good effluent and/or impact data (i.e. a Criterion 1 – Data score of 5 or less for the Effluent category), or they cannot be easily addressed using the Evidence-Based Assessment, the Risk-Based Assessment must be used.

Effluent: Evidence-Based Assessment (based on good data availability and quality)

The Evidence-Based Assessment is the preferred method if good research or data are available (i.e. a Criterion 1 – Data score of 7.5 or higher for the Effluent category). To complete the Evidence-Based Assessment, consider the available data and evidence of impacts, and select the most appropriate score from the examples in the table below. While every eventuality may not be covered in the table, use the examples as guidelines to determine the most appropriate score.

In the table, ‘impacts’ are defined as evidence of eutrophication, low dissolved oxygen, high sulfide contents, low redox potential, algae blooms, changes in species diversity or community structure associated with excess nutrients, salinization, dispersal of other farm wastes, or other relevant measurements or indicators of exceeding the carrying capacity of the local or regional environment at any time over multiple production cycles, particularly including periods of peak biomass, harvest and occasional operations (e.g., pond flushing, cleaning or sludge disposal).

Effluent Concern	Effluent or Pollution Examples	Score
No concern	▪ The species produced is extractive, or not provided external feed or nutrient fertilization and has no other effluent or waste impacts ▪ The production system does not discharge¹⁰ wastes ▪ Data show the effluent discharged is of the same quality as the influent water supply	10
Low	▪ Data show no evidence that effluent discharges cause or contribute to cumulative impacts at the waterbody/regional scale <u>and the impacts within the immediate vicinity of the farm are reversible</u>	8
Low-moderate	▪ Data show no evidence that effluent discharge impacts beyond the immediate vicinity of the farm or discharge point¹¹ <u>that effluent discharge(s) result in occasional and temporary impacts within the</u>	6

¹⁰ Soluble and solid wastes – including solids such as pond sludge, filter solids, plastic wastes etc.

¹¹ ~~Immediate vicinity – as a guide, beyond 30 m from the farm, or beyond an allowable zone of effect~~

	<u>immediate vicinity of the farm</u> , but there is potential for cumulative impacts at the waterbody or regional scale	
Moderate	▪ <u>Data show that effluent discharge(s) result in frequent yet temporary impacts within the immediate vicinity of the farm, and there is potential for cumulative impacts at the waterbody or regional scale, or;</u> ▪ Data show only occasional, temporary or minor¹² evidence of impacts beyond the immediate vicinity of the farm or discharge point, or contributions to cumulative local or regional impacts	4
Moderate-high	▪ <u>Data show that effluent discharge(s) result in frequent yet temporary impacts beyond the immediate vicinity of the farm</u>Data show evidence of frequent impacts beyond the immediate vicinity of the farm or discharge point, or contributions to cumulative local or regional impacts	2
High	▪ Data show <u>effluent</u> discharges cause persistent and/or irreversible impacts beyond the immediate vicinity of the farm or discharge point, and/or contribute to cumulative local or regional impacts	0
Critical	▪ Data show <u>effluent</u> discharges from aquaculture operations lead to population declines in key indicator species beyond the immediate vicinity of the farm or discharge point, or result in mortality of protected or endangered species¹³	C

*Note: intermediate values (i.e., 1,3,5,7 or 9) may be used if needed.

Effluent criterion score = _____ (range 0–10)

If the assessed operation(s) cannot be addressed using these categories, or if the Criterion 1 – Data score is less than 7.5 for the Effluent category, continue to the Risk-Based Assessment and Factors 2.1 and 2.2 below:

Effluent: Risk-Based Assessment (based on poor data availability or quality)

Use this Risk-Based Assessment when the data quality is not good enough to use the Evidence-Based Assessment above; (i.e. when the Criterion 1 – Data score for effluent is 5 or lower).

This criterion estimates the waste produced per ton of fish, then estimates the amount of that waste that is discharged from the farm (Factor 2.1). This is combined with the effectiveness of the regulatory or management scheme to manage the potential cumulative impacts from the total tonnage of any one farm, or from multiple farms (Factor 2.2).

¹² Occasional, temporary or minor – as a guide, exceedances of regulatory limits or other values occur in less than 10% of the measurements within a year or less than 10% of the total duration of a year, and are not considered to have any lasting impact beyond the exceedance period.

¹³ Species listed as protected, vulnerable, threatened, endangered or critically-endangered by the IUCN (Red list) or by a national or other official list with equivalent categories. However, more recent or more regional/stock specific data can override these determinations.

Effluent: Factor 2.1 – Waste discharged per ton of fish

Factor 2.1 is a combination of the waste produced per ton of fish (2.1a) and the proportion of that waste that is discharged from the farm, which is dictated in general by the production system (2.1b).

Polyculture systems

For assessments concerning polyculture systems, extractive species that consume material entirely within the system (e.g. shrimp when cultured with tilapia in ponds) will be included in the calculation to determine biological waste production per ton of fish (2.1a). When an extractive species is consuming nutrients from both the system and the ambient environment (e.g. seaweeds and mussels when cultured on salmon cages), these species will be incorporated into the assessment of the production system discharge (2.1b).

Factor 2.1a – Biological waste production per ton of fish

- a) Protein content of feed = _____ %
- b) Economic feed conversion ratio (eFCR¹⁴) = _____
- c) Fertilizer nitrogen input per ton fish produced = _____ kg N t⁻¹
- d) Protein content of harvested whole fish = _____ %
- e) Protein nitrogen content factor = 0.16 (fixed value; protein is 16% nitrogen)

Nitrogen input per ton of fish produced = $(a \times 0.16 \times b \times 10) + c =$ _____ kg N t⁻¹

Harvested nitrogen per ton of fish produced = $(d \times 0.16 \times 10) =$ _____ kg N t⁻¹

Waste N produced per ton of fish = N input - harvested N = _____ kg N t⁻¹

Factor 2.1a score = _____ kg N t⁻¹

Factor 2.1b – Production system discharge

This factor assesses how much of the waste produced by the fish is actually discharged from the farm; it acts as a multiplier value (between 0 and 1) for Factor 2.1a.

Select the basic scores and adjustments for the production system from the table below. The pre-selected values are based on the available scientific literature on nutrient dynamics in different aquaculture systems. If specific data are available on waste loss, waste treatment, waste collection or other aspects of the production system that reduce the loss of the nutrients, then use them where possible (marked by 'X').

System Characteristic	Basic Score	Adjust
Nets, cages and pens		
1. Open exchange net pens or cages	0.8 <u>1.0</u>	

¹⁴ eFCR = total feed inputs divided by total harvested fish output over the entire production cycle. It should ideally be averaged over multiple production cycles and take account of seasonal differences (e.g., wet or dry season, age of fish). If these data are not readily available, be precautionary and use the best data available.

2. Modified cages (e.g., 'diapers') – provide data ¹⁵ on waste collection	X	
Adjustment – other – provide data		-X
Ponds		
1. Ponds – unknown operation, or operating as a flow-through raceway system. <u>(all solid and soluble waste discharged)</u>	1.0	
2. Ponds – average annual daily exchange >3 %	0.51	
3. Ponds – average annual daily exchange <3 %	0.42	
4. Ponds – discharge once per cycle, exchange at harvest	0.34	
5. Zero exchange ponds over multiple cycles	0.24	
6. Ponds – other – provide data	X	
Adjustment (pond average annual daily exchange >3%) – settling pond adjustment-use (daily use with discharged water; minimum 12 hours retention time)		-0.17
Adjustment (pond average annual daily exchange >3%) – settling pond use (daily use with discharged water; minimum 12 hours retention time) <u>use of settling pond for discharged harvest water</u>		-0.1
Adjustment (pond average annual daily exchange >3%) – proper sludge disposal adjustment		-0.24
Adjustment (pond average annual daily exchange <3%) – settling pond adjustment-use (daily use with discharged water; minimum 12 hours retention time)		-0.14
Adjustment (pond average annual daily exchange <3%) – settling pond use (daily use with discharged water; minimum 12 hours retention time) <u>use of settling pond for discharged harvest water</u>		-0.08
Adjustment (pond average annual daily exchange <3%) – proper sludge disposal adjustment		-0.2
Adjustment – other – provide data		-X
Raceways or tanks		
Raceways, tanks – operating as flow-through (solids and soluble waste discharged)	1.0	
Raceways, tanks – flow-through with solids collection AND appropriate disposal (soluble waste discharge)	0.8	
Raceways, tanks – recirculation system, solids collection AND appropriate disposal plus biofiltration treatment (or other) for soluble wastes;	0	
Raceways, tanks – other treatment system – provide data	X	
Adjustment – inappropriate disposal of collected solid wastes		+ 0.2
Adjustment - biofiltration treatment (or other) for soluble wastes		- 0.8
Adjustment – other – provide data		-X

¹⁵ [Information on 'typical' recapture potential for a given system, raw data on known recapture potential, etc.](#)

Other systems		
Provide data	X	- X
Other adjustments		
Adjustment - use of IMTA or other nutrient uptake system – provide data on N uptake		- X
Other nutrient adjustments		X

Basic (unadjusted) production system discharge score = _____

Adjustment 1 = _____ (leave blank if no adjustments)

Adjustment 2 = _____

Adjustment 3 = _____

Factor 2.1b: Discharge score = _____ (range 0-1)

Note: the final discharge score must be between 0 and 1 (i.e., between 0 and 100% of the waste produced is discharged).

Factor 2.1 score:

The Factor 2.1 score is the product of the amount of waste produced per ton of fish (kg N ton⁻¹ fish) and the percentage of waste that leaves the farm. This value is allocated a 0-10 score based on an aquaculture-relative range from zero kg N ton⁻¹ discharge (score 10) to a high discharge of >90 kg N ton⁻¹ (Score 0 of 10).

Waste discharged = Waste produced x Production system discharge score

Waste discharged per ton of fish = 2.1a x 2.1b = _____ kg N ton⁻¹

Discharge Description	Value (kg N ton ⁻¹)	Score
	0	10
Low	0.1 – 9.9	9
	10 – 19.9	8
Low-moderate	20 – 29.9	7
	30 – 39.9	6
Moderate	40 – 49.9	5
	50 – 59.9	4
Moderate-high	60 – 69.9	3
	70 – 79.9	2
High	80 – 89.9	1
	> 90	0

Factor 2.1 score = _____ (range 0–10)

Effluent: Factor 2.2 – Management of farm-level and cumulative impacts

This factor is a measure of the presence and effectiveness of laws, regulations, management control measures, farm-level practices or eco-certification (appropriate to the scale of the industry) to limit the total discharge of wastes from farms and the cumulative impacts of aquaculture effluent from multiple farms to within the carrying capacity of the receiving environment. It is considered necessary for farms, industries or countries that export farm-raised

seafood to be transparent about the environmental management measures and regulations that control the way the exported seafood was produced.

For third party certified farms or other independently verified standards, it is acceptable to answer the questions relating to the relevant standards and inspection/audit process where these are considered to be more robust than the regulatory (or other) system.

Factor 2.2a – Content of effluent management measures

Consider the content of relevant management measures such as:

- National¹⁶, regional or local effluent regulations.
- Applicable industry codes of good practice.
- Applicable area-based or producer organization agreements, or farm-level management systems.
- Any other management measures relating to effluent.

Contact relevant management agencies and in-country NGO, academic or industry experts and decide the appropriate content score from the broad descriptions in the following table:

Content	Description	Score
Comprehensive	An area-based, cumulative management system is in place for multiple industries including aquaculture, with effluent limits set for aquaculture in combination with other industries ¹⁷ . Limits are based on the carrying capacity of the receiving waterbody.	5
Robust	An area-based, cumulative management system is in place for aquaculture effluents, with limits defined and applied at the farm-level appropriate to the receiving waterbody.	4
Moderate	Management system sets effluent limits, based on relevant ecological factors at the site level but not at the cumulative or area level. Limits cover the entire production cycle and cover peak events (e.g. max biomass, harvest, sludge disposal etc.).	3
Limited	Management system does not set site-specific effluent limits, or the limits are not based on ecological principles, or the limits do not cover the entire production cycle and cover peak events (e.g. harvest, sludge disposal etc.).	2
Minimal	Unknown or unclear management structure for aquaculture, or the effluent limits set are not specific or relevant to aquaculture or the receiving water.	1
Absent	No relevant management systems in place for aquaculture effluents	0

Factor 2.2a score = ____ (0–5)

Factor 2.2b – Enforcement of effluent management measures

Even comprehensive regulations or management measures are not effective without appropriate enactment and enforcement. Consider the available information on the enforcement of the effluent management measures apparent in Factor 2.2a above and decide the appropriate

¹⁶ Use the relevant FAO National Aquaculture Legislation Overview (NALO) country factsheet if necessary.

¹⁷ E.g. agriculture, manufacturing or domestic wastes.

enforcement score from the broad descriptions in the following table. If an assessed operation's third-party certification is the most relevant example of management, then apply the questions to the inspection/auditing and certification process.

Enforcement	Description	Score
Highly Effective	Enforcement organizations are identifiable and contactable, and resources are appropriate to the scale of the industry. Enforcement is active at the area-based scale, and covers the entire production cycle and peak events. Evidence of monitoring and compliance, and evidence of penalties for infringements are available.	5
Effective	As Highly Effective above, but with minor limitations to any aspect.	4
Moderate	Enforcement organizations are identifiable and active, but have limitations in resources or activities that reduce effectiveness. Some gaps in monitoring or compliance data.	3
Limited	Enforcement measures are limited, do not cover the complete production cycle or do not cover peak effluent events. Monitoring or compliance data are limited.	2
Minimal	Enforcement organizations and their activities are difficult to identify. Little evidence of monitoring or compliance data, or limited evidence of penalties for infringements.	1
Ineffective	No evidence of effective enforcement activity. Persistent illegal activities occurring.	0

Factor 2.2b score = _____ (0–5)

Factor 2.2 score = $(2.2a \times 2.2b) / 2.5$

Factor 2.2 effluent management score = _____ (range 0–10)

Final effluent criterion score

Although reducing waste produced per ton of production is important, the total or cumulative amount of waste produced by the farms and the industry is typically more important. The effectiveness and enforcement of the management regime is most relevant to controlling farm size, total waste discharge and cumulative industry impact. The scoring matrix below therefore favors a low waste discharge per ton of production, but also values the effectiveness of management to control cumulative impacts.

Select the final effluent score from the table using the waste discharge (Factor 2.1) and management (Factor 2.2) scores.

		Management score (Factor 2.2)										
		10	< 10	< 9	< 8	< 7	< 6	< 5	< 4	< 3	< 2	< 1
Waste discharge score (Factor 2.1)	10	10	10	10	10	10	10	10	10	10	10	10
	9	10	10	9	9	9	8	8	7	7	7	6
	8	10	9	9	8	8	7	7	6	6	5	5
	7	10	9	8	7	7	6	6	5	5	4	4
	6	10	9	8	7	6	6	5	5	5	4	3
	5	10	8	7	6	6	5	5	5	4	4	3
	4	10	8	7	6	5	5	4	4	4	3	2
	3	10	8	7	6	5	4	4	4	3	2	1
	2	10	7	6	5	4	4	3	3	2	1	0
	1	10	7	6	4	3	3	2	2	1	0	0
	0	10	6	5	3	2	2	1	1	0	0	0

Final effluent criterion score = _____ (range 0–10) (Zero score = Critical)

Criterion 3 – Habitat

Impact, unit of sustainability and principle

- *Impact:* Aquaculture farms can be located in a wide variety of aquatic and terrestrial habitat types and have greatly varying levels of impact to both pristine and previously modified habitats as well as to the critical “ecosystem services” they provide.
- *Unit of sustainability:* The ability to maintain the critical ecosystem services relevant to the habitat type.
- *Principle:* Being located at sites, scales and intensities that maintain the functionality of ecologically valuable habitats.

Request for Comment

Aside from the changes described in Criterion 2 (i.e. including all effluent-related impacts of production, regardless of their distance from the farm footprint, in Criterion 2), we are not proposing any material changes to Criterion 3. We have modified language to clarify the existing justification for the year 1999 as a habitat impact temporal threshold and to provide better consistency in this rationale.

Please provide comment on the proposed language modifications.

Comment:**Background and Rationale**

The Habitat Criterion assesses the impacts, or risk of impacts, Effect of farm construction on the habitats in which farms are sited (Factor 3.1) and the scope and effectiveness of management or regulatory systems which govern them (Factor 3.2). The effects of farm siting on habitat are challenging to quantify because the establishment of farms has a *de facto* deleterious impact on the existing terrestrial or aquatic ecosystem relative to baseline conditions. The degree of impact must then be ascribed relative to the change in ecosystem structure and function.

In most cases, our current scientific understanding of the structure and function of ecosystems is not sufficiently complete to have accurate *a priori* knowledge of how species declines or changes in network structure or complexity will affect an ecosystem's overall resilience. Similarly, we cannot currently predict where systems will encounter ecological tipping points – although we know that such dynamics regularly exist (Ellis et al. 2011, Scheffer et al. 2009).

The Habitat Criterion must also cater to the diversity of aquaculture production systems used (i.e. the differing impacts of floating pens, or constructed ponds), the global scope of potential habitats (from open ocean to coastal to freshwater to terrestrial), and also consider the complexities of historic and recent habitat conversion (e.g. for agriculture) and subsequent secondary conversion for aquaculture.

In addition to the technical complexity of assessing habitat impacts, expert opinion also varies widely. Considering the satellite photo in Figure 2 (of shrimp farms in Thailand), expert comments have concluded this to be either a heavily-impacted area of coastal habitat with greatly reduced ecosystem services that should be given a low habitat score, or conversely, as an area already heavily-impacted by human activity in general and therefore a good place to concentrate aquaculture to avoid further impacts to pristine habitats (worthy of a high habitat score).



Figure 2 – Shrimp farms in Eastern Thailand, showing impacts to coastal, estuarine and terrestrial habitats, and evidence of historic conversion of original pristine habitats for rice culture and urban development and subsequent re-conversion to shrimp ponds.

Given these constraints, this criterion is based on the evidence of change in the provision of ecosystem services that results from habitat conversion or modification for aquaculture. The change in ecosystem services supply has been increasingly used to assess the impact of land use change (Metzger et al. 2006). The flexibility of this framework allows its appliance to the different terrestrial and aquatic ecosystems in which aquaculture operations are located.

The Habitat Criterion includes two parts: habitat conversion and function (F3.1) and farm siting management effectiveness (F3.2). Factor 3.1 estimates the impact of habitat conversion to aquaculture in terms of ecosystem function by using indicators for assessing changes in the provision of ecosystem services. While Factor 3.1 assesses the impact at the farm level, Factor 3.2 deals with the existence and enforcement of management and regulations that limits the expansion and cumulative impact of multiple farms on the provision of ecosystem services.

Factor 3.1 – Habitat functionality

This factor is intended to describe whether the assessed industry has maintained functionality of ecosystem services in the habitats where it operates, or has contributed to a loss of ecosystem services historically (~~prior to 1999~~^{>15 years ago}), in the recent past (~~since 1999~~^{<15 years}), or is having an ongoing impact. ~~Fifteen years~~^{The year 1999} was chosen as the threshold date for ‘historical’ or ‘recent’ due to the pivotal Resolution VII.21, Enhancing the conservation and wise use of intertidal wetlands¹⁸, of the Contracting Parties to the Convention on Wetlands (colloquially known as the Ramsar Convention)~~the adoption of the~~

¹⁸ https://www.ramsar.org/sites/default/files/documents/library/key_res_vii.21e.pdf

~~mission of the RAMSAR Convention by its Parties in 1999 (“the conservation and wise use of all wetlands....”).~~ Although Ramsar is specific to wetland habitat, we would suggest that it serves as an appropriate industry-wide threshold date, after which existed a rapidly building awareness of the importance of functioning habitats **and the increasing consensus that ongoing conversion of pristine habitats is unacceptable.** 

Habitat conversion for aquaculture purposes is measured through the effect on the provision of ecosystem services. Ecosystems provide life support functions as well as other valuable services, many of which are essential to human welfare and for all practical purposes, non-substitutable. For instance, coastal ecosystems generate a wide range of ecosystem services including protection from wave damage and flooding, habitat for fish and shellfish (i.e. food production), improvements to water quality, and the enhancement of recreational, tourism, aesthetic, spiritual and cultural values. The maintenance of critical ecosystem service provision after the conversion to aquaculture is considered optimal, and the degree of impact is assessed through the maintenance/loss of different ecosystem services.

Different indicators have been developed to monitor the status and trends in ecosystem services provision. Biological indicators, such as land cover, presence of keystone species, and biodiversity indexes, are used frequently (Feld et al. 2009). Indicators can be measured in “pristine” or minimally impacted conditions and then compared with the aquaculture site (Borja et al. 2012), or can be estimated through ecological models, remote sensing, or GIS. As the relationship between a given ecosystem service and particular structural components of the ecosystem may be non-linear (Barbier et al. 2008, Ellison 2008), indicators should be useful to identify if a system is moving towards or has already passed a threshold of functionality. Gradually changing conditions, such as habitat fragmentation or loss of diversity, can surpass threshold levels, triggering the loss of an ecosystem service. Recovering the ecosystem service can be complex, and sometimes ~~even~~ impossible. The restoration of the system to its previous state requires a return to environmental conditions well before the point of collapse. This pattern is known as “hysteresis” and it implies that the recovery time is usually longer than the duration of the impact (Scheffer & Carpenter 2003).

If there is evidence of loss of functionality (i.e., the provision of one or more critical ecosystem services is lost), then the Factor 3.1 score will depend on how long ago the original ecosystem was converted to aquaculture production and on the type of ecosystem. If the farms were established ~~more than 15 years ago prior to 1999~~ in original (or “pristine”) ecosystem, or ~~less than 15 years ago since 1999~~ in a habitat that had previously lost functionality (e.g. rice fields, pastures, dammed lakes/reservoirs), then the score will typically be higher (between 4 and 6 depending on the original habitat value) than if the aquaculture farm has been recently established (~~less than 15 years after 1999~~) in a pristine habitat. This classification seeks to penalize the damage that resulted from aquaculture conversion, but avoids making aquaculture industries responsible for previous or historic habitat conversions. Furthermore, the score depends on the type of the original habitat. Habitats are classified into high-, moderate-, and low-value according to the quantity and quality of critical ecosystems services that they provide. Ongoing conversion of high-value habitats resulting in a loss of functionality results in a zero score, and ongoing loss of habitat functionality due to illegal siting activity results in a Critical score.

Factor 3.2 – Management Effectiveness

The impact of habitat conversion can be considered cumulatively and proximally, with individual farms contributing incrementally to effects at the landscape level, likely having the greater overall impact. However, Seafood Watch believes it important to consider both levels of impact. In order to determine the cumulative impact of aquaculture on habitat function, Factor 3.2 assesses the existence and enforcement of regulations that control and/or limit aquaculture industry size and concentration, or in their absence, effective industry management measures. Aquaculture siting management requires a regional, ecosystem-based approach focused on the assimilative capacity determined by baseline conditions. An appropriate farm siting involves in-depth knowledge of the environment, as well as an understanding of different institutional factors (Longdill et al. 2008). The ecosystem approach should consider the aquaculture operation within the wider ecosystem (Soto et al. 2008), by protecting community resources, and promoting the rehabilitation of degraded habitats. Therefore, the siting process should be part of wider zoning plans such as Integrated Coastal Zone Management (Primavera 2006). Furthermore, the siting and regulation process not only has to be based on ecological principles, but should be consistent, transparent, and objective (King & Pushchak 2008).

Factor 3.2a – Content of management measures

This factor is intended to assess the strength of management systems in place that regulate or effectively manage aquaculture operations. It is the assumption of Seafood Watch that regulatory systems managing impacts according to area management practices or cumulative impacts are most appropriate for addressing impacts from aquaculture industries, as it is possible for aquaculture operations that are managed at the farm level to overlook potential cumulative habitat impacts. However, it is also possible for aquaculture to be managed in a way that has a minimal overall impact if the farm's size and location, or the concentration and connectivity of multiple farms, are well managed or regulated. Furthermore, the ability for area-based management systems to mitigate cumulative impacts is still being determined.

Factor 3.2b – Enforcement of management measures

This factor is intended to assess the enforcement and applicability of management systems in place. It is the view of Seafood Watch that a management system is only as strong as its enforcement mechanism. If a management system exists but is not being enforced, it is not considered to be effective.

The final score for F3.2 results from the multiplication of these two factors (3.2a and 3.2b). By doing this, a high score is only achieved if both factors present high values (i.e. good regulations and good enforcement). Alternatively, even if the regulatory and management effectiveness is good, a lack of enforcement will result in a low overall score for Factor 3.2.

It is recognized that the regulatory or management effectiveness and enforcement (although it is actually considered to be the controlling factor in large-scale habitat and ecosystem impacts of aquaculture) is typically not in the direct control of the aquaculture operations being assessed. Aquaculture operations do have control of the specific site selection and the habitats directly impacted; therefore Factor 3.1 is given a double weighting compared to Factor 3.2 in the final score.

Scoring of the Habitat criterion as Critical occurs when the Factor 3.1 Habitat conversion and function score is 0 of 10 meaning that there is ongoing conversion of high-value habitats due to illegal siting activities that results in the loss of ecosystem services.

Scoring of the Habitat criterion as Critical also occurs if the Final score for the Criterion is 0 of 10. This is the result of scores of 0 of 10 in Factors 3.1 Habitat conversion and function and 3.2 Farm siting regulation and management.

Habitat: Factor 3.1 – Habitat conversion and function

A categorical measure of habitat impact taking account of the ongoing functionality of affected habitats and the historic or ongoing nature of the habitat conversion for aquaculture.

Definitions:

- Maintaining functionality – aquaculture has not caused the loss of any critical ecosystem services.
- Loss of functionality – aquaculture has caused ‘major’ habitat impacts, defined as the loss of one or more critical ecosystem services.
- **Critical ecosystem services are those that:**
 - society depends on or values;
 - are undergoing (or are vulnerable to) rapid change;
 - have no technological or off-site substitutes.

Note: Because the Seafood Watch Aquaculture Standard assesses all production systems in various habitats in all locations around the world, a single, specific definition of “critical” ecosystem services may not be universally applicable. The three principles that are outlined above are intended to guide analysts in evaluating which ecosystem services in the area of the assessment are critical.

Assessment Instructions:

Step 1

- Determine the appropriate habitat type for the farm, farms, region or industry being assessed. Use “average” habitat types where necessary, or split the assessment into different recommendations if habitat types lead to different scores and overall ranks.

Step 2

- With consideration of the overall scale and intensity of the industry in any one habitat type, determine if key ecosystem services continue to function, and the degree of functionality remaining.
 - If all critical ecosystem services are maintained¹⁹, the habitat is considered to be “maintaining full functionality”.
 - If all critical ecosystem services are maintained to some degree, the habitat is considered to be “maintaining functionality” and the score will depend on the **degree of impact**.

¹⁹ For aquaculture located in modified habitats such as reservoirs, dammed lakes or canals, agricultural lands etc., consider the ecosystem services provided by the modified habitat and the impacts of aquaculture upon them.

- If any critical ecosystem service has been lost, the habitat is considered to have lost functionality.
- If the habitats are considered to be maintaining functionality, then use Table 1 and the examples in the Appendix to determine the appropriate score.
- If the habitat is considered to have lost functionality, go to Step 3.

Step 3

- If the habitats are considered to have lost functionality, then consider the scores in Table 2 along with the timeframe of historic and/or ongoing habitat loss
- Use the habitat values in Table 3 where necessary.

Habitat: Table 1 – Maintaining habitat functionality

Habitat Functionality	Impact on Habitat Functionality	Score
Maintaining functionality	Maintaining full functionality	10
	Minimal impacts	9
	Minor-moderate impacts	8
	Moderate impacts	7
Loss of functionality	Major impacts	Go to Table 2

Habitat: Table 2 – Loss of habitat functionality

Timeframe of Habitat Loss	Habitat Value	Score
Historic loss of functionality occurred <u>prior to 1999</u> >15 years ago	Low	6
Historic loss of functionality occurred <u>prior to 1999</u> >15 years ago	Moderate	5
Historic loss of functionality occurred <u>prior to 1999</u> >15 years ago	High	4
Loss of functionality occurred <u>prior to 1999</u> <15 years ago, or ongoing loss of functionality	Low	3
Loss of functionality occurred <u>prior to 1999</u> <15 years ago, or ongoing loss of functionality	Moderate	2
Loss of functionality occurred <u>prior to 1999</u> <15 years ago	High	1
Ongoing loss of habitat functionality	High	0
Ongoing loss of habitat functionality due to illegal siting activity	High	Critical

Habitat: Table 3 – Habitat value²⁰

High	Moderate	Low
Coastal intertidal	Coastal inshore sub-tidal ²¹	Open ocean/offshore ²²

²⁰ The designations of value for each of the habitats listed in Table 3 are generalizations, and if data support a higher or lower value of a particular habitat within the scope of an assessment, that value shall supercede the generalization.

²¹ Inshore sub-tidal = approximately from zero to three nautical miles from the main coastline.

²² Open ocean/offshore = greater than three nautical miles offshore.

Coastal/terrestrial shoreline Estuaries Tidal wetlands and forests Freshwater wetlands Coral reefs Seagrass/algae beds Freshwater lakes Rivers and streams Tropical broadleaf and mixed forests	Riparian land and floodplains Temperate broadleaf and mixed forests	Coniferous forests Grasslands, savanna and shrublands Desert and dry shrublands <u>Modified habitat</u> ²³
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Factor 3.1 score = _____ (range 0–10)

Habitat: Factor 3.2 – Farm siting regulation and management

Ecosystem impacts are driven largely by the cumulative effects of multiple farms in a location, habitat type, region or a country, and on their separation distances, connectivity and overall intensity. This factor (3.2) is a measure of the presence and effectiveness of regulatory or management measures appropriate to the scale of the industry, and therefore a measure of confidence that the cumulative impacts of farms sited in the habitats declared in Factor 3.1 above are at appropriate spatial scales.

Regulations or management measures relates to policies, legislation or regulations, aquaculture zoning, zonal management, and/or independently verified management measures such as codes of practice, Best Management Practices or certification schemes that have the appropriate language²⁴ and authority for enactment.

Assessment instructions

Consider the content of relevant management measures such as:

- National²⁵, regional or local habitat regulations.
- Applicable industry codes of good practice.
- Applicable area-based or producer organization agreements, or farm-level management systems.
- Any other management measures relating to habitat.

Contact relevant management agencies and in-country NGO, academic or industry experts and decide the appropriate content score from the broad descriptions in the following table:

For third-party certified farms or other independently verified standards, it is acceptable to answer the questions relating to the relevant standards and inspection/audit process where

²³ For example, reservoirs, dammed lakes or canals, agricultural lands, etc.

²⁴ Designed for, or applicable to aquaculture – as opposed to regulations designed for fisheries, agriculture or other activities or industries that are poorly related to the needs of aquaculture regulation. Appropriate language – avoidance of ‘should’, ‘minimize’, etc.

²⁵ Use the relevant FAO National Aquaculture Legislation Overview (NALO) country factsheet if necessary.

these are considered to be more robust than the regulatory (or other) system at controlling impacts from multiple farms.

Factor 3.2a – Content of habitat management measures

Decide the appropriate content score from the broad descriptions in the following table:

Content	Description	Score
Comprehensive	Area based, cumulative management system is in place with aquaculture farm siting integrated with other industries based on maintaining ecosystem functionality of the affected habitats. Future expansion is addressed accordingly, and if relevant ²⁶ , restoration of former high value habitats is required.	5
Robust	Area based, cumulative management system is in place for aquaculture farm siting based on maintaining ecosystem functionality of the affected habitats, or acceptable habitat impacts are defined within an ecosystem- and area-based habitat management system. Future expansion is addressed accordingly, and if relevant, restoration of former high value habitats is encouraged.	4
Moderate	The management system requires farms to be sited according to ecological principles and/or environmental considerations (e.g. EIAs may be required for new sites), but there are limited considerations of cumulative habitat impacts and loss of ecosystem services.	3
Limited	The management system may be based on ecological principles, but do not account for habitat connectivity and cumulative impacts on ecosystem services.	2
Minimal	Unknown or unclear management system for aquaculture, or the management system is not based on ecological principles.	1
Absent	No relevant management systems in place for aquaculture siting and habitat impacts.	0

Factor 3.2a score = _____ (range 0–5)

Factor 3.2b – Enforcement of habitat management measures

Consider the available information on the enforcement of the habitat management measures apparent in Factor 3.2a above and decide the appropriate enforcement score from the broad descriptions in the following table.

Enforcement	Description	Score
Highly Effective	Enforcement organizations are identifiable and contactable, and their resources are appropriate to the scale of the industry. Enforcement is active at the area-based or habitat scale, the permitting or licensing	5

²⁶ Restoration is relevant if high value habitats (as defined in Section 3.1) have been converted for aquaculture or ecosystem services have been lost.

	process is transparent ²⁷ , and evidence of penalties for infringements are available.	
Effective	As Highly Effective above, but with minor limitations to any aspect.	4
Moderate	Enforcement organizations are identifiable and active, but have limitations in resources or activities that reduce effectiveness. Cumulative habitat impacts may not be fully addressed, and some gaps in transparency or compliance data may be apparent.	3
Limited	Enforcement measures are limited, do not cover cumulative habitat impacts, or transparency and compliance data are limited.	2
Minimal	Enforcement organizations and their activities are difficult to identify. Little evidence of monitoring or compliance data, or limited evidence of penalties for infringements.	1
Ineffective	No evidence of enforcement activity. Persistent illegal siting activities occurring ²⁸	0

Factor 3.2b score = _____ (range 0–5)

Factor 3.2 Siting management score = $(3.2a \times 3.2b) / 2.5 =$ _____ (range 0–10)

Final Habitat Criterion score = $[(2 \times \text{Factor 3.1}) + (\text{Factor 3.2})] / 3$

Habitat Criterion score = _____ (Range 0–10) (Zero score = Critical)

Criterion 4 – Chemical use

Impact, unit of sustainability and principle

- **Impact:** Improper use of chemical treatments impacts non-target organisms and leads to production losses and human health concerns due to the development of chemical-resistant organisms.
- **Unit of sustainability:** Non-target organisms in the local or regional environment, presence of pathogens or parasites resistant to important treatments.
- **Principle:** Limit the type, frequency of use, total use, or discharge of chemicals to levels representing a low risk of impact to non-target organisms.

²⁷ For example, public availability of farm locations and sizes, EIA reports, zoning plans, etc.

²⁸ E.g. Farm siting in MPAs, evidence of widespread illegal farm siting

Request for Comment

We have modified some language to clarify existing intent and modified two aspects of scoring. Please provide comment on the proposed modifications to scoring, shown as Tracked Changes in the Criterion 4 scoring table:

1. For a score of 10 out of 10, the specification that data show chemical treatments have not been used over 3 or more consecutive production cycles.
2. While the use of antimicrobials critically important for human medicine in significant quantities (usually defined as more than once per production cycle) remains at a score of 0 out of 10, the use of those products in unknown quantities is now considered a 'Critical' conservation concern.
3. We would like to insert more clarifying guidance on the definition of a 'single treatment' and are seeking public comment on this definition. Please see highlighted footnote in the scoring table.
4. Guidance for polyculture assessments has been inserted into the assessment guide.

Comment:

Request for Comment
There are clearly differences in impacts and risks of impacts associated with chemical use, depending on a number of factors (e.g. products, species, production system, region). Data regarding these impacts are generally poor, which can be a constraint when writing Seafood Watch assessments. We are considering developing a guidance table that could clarify some of the risks of impacts and are seeking input on suggested content for this proposed guidance table.
Comment:

Background and Rationale

A wide range of chemicals are used in aquaculture systems for a variety of purposes, but most importantly they are applied for disease treatment and pest management. The most common classes of chemicals used include pesticides (parasiticides, piscicides), disinfectants, antibiotics, antifoulants, anesthetics, and herbicides. The potential effects of chemical use on natural ecosystems and human health have raised growing awareness about the need for responsible practices (Cabello et al. 2013, Cole et al. 2008, Rico et al. 2012). Although the improvement of management practices in some production systems (e.g. Norwegian farmed salmon - Figure 4) has resulted in a multi-decadal reduction in chemical use, especially in antibiotics, fish farmers still use chemicals on a regular basis in their operations (Milanao et al. 2011, Rico et al. 2012).

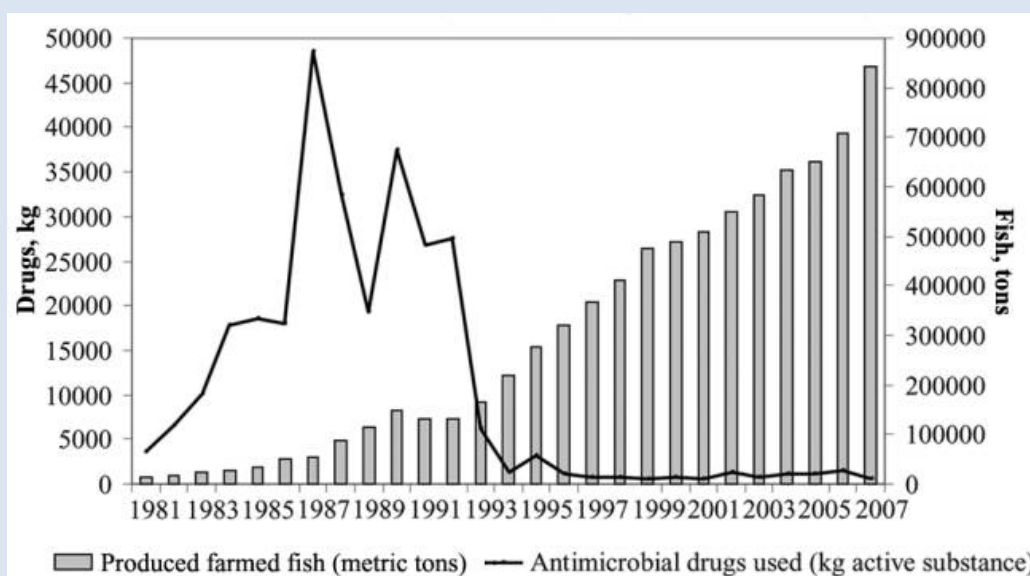


Figure 4 — Antimicrobial drug use, and farmed Atlantic salmon (*Salmo salar*) and rainbow trout (*Oncorhynchus mykiss*) production in Norway. From Heuer et al. (2009).

The potential negative ecological impacts associated with the use of chemicals are related to their toxicity and/or long term impacts to non-target organisms, and to other organisms such as bacteria, that may alter biogeochemical processes. Chemicals used in aquaculture operations can also reach wild fish and shellfish surrounding aquaculture sites. For instance, residues of antibiotics were found in the tissue of two wild fish species near salmon farms in Chile (Fortt et al. 2007). Exposure to other chemicals such as copper can also cause adverse health effects in aquatic organisms (Santos et al. 2009). Some chemicals such as hydrogen peroxide break down rapidly in the environment into harmless components and are therefore of lower concern from an environmental perspective.

The improper use of antibiotics, several of which are persistent in the environment, generally results in the emergence and spread of resistance against the drug (Buschmann et al. 2012). Millanao et al. (2011) demonstrate that the major concern with excessive antibiotic use is the development of resistance by bacterial populations, particularly those listed as “Critically Important” for human medicine according to the World Health Organisation (WHO, 2011). It

is clear that any and every use of antibiotics selects for resistance (Davies, 2010), and it is therefore essential that antibiotic use is minimized and that they are used prudently.

The emergence of antibiotic resistance among fish pathogens undermines the effectiveness of the prophylactic use of antibiotics in aquaculture (Baquero et al. 2008). The antibiotic resistance can be transmitted to bacteria of the terrestrial environment, including human pathogens (Cabello et al. 2006, Sapkota et al. 2008). The development of antimicrobial resistance in bacteria causing infections in humans may result in (1) an increased number of infections, and (2) an increased frequency of treatment failures and increased severity of infection (Heuer et al. 2009).

In the case of pesticide “therapeutants”, there is evidence of loss of sensitivity in sea louse to emamectin benzoate in at least Chile (Bravo et al. 2008) and Canada (Jones et al. 2013, BurrIDGE and Van Geest, 2014), and to cypermethrin in Norway, Scotland, and Ireland as a consequence of their overuse in Atlantic salmon farms (Sevatdal et al. 2005).

The impact of chemical use depends on the extent to which these chemicals reach the environment. Therefore, the degree of openness of culture facilities ultimately determines the risk associated with chemical use. Open systems such as cages or frequently exchanging ponds inherently carry the highest risks, as unconsumed food and fish waste, both of which will contain antibiotics, are directly released to the environment. According to Christensen et al. (2006), 70 -80% of the antibiotics administered as medicated pelleted feed are released into the aquatic environment via urinary and fecal excretion and in unconsumed medicated food. In contrast, closed systems present the lowest risk of releasing these chemicals into the environment (Tal et al. 2009).

Unfortunately, robust data on chemical use (type, toxicity, frequency of use, dose, discharge, decomposition, dilution, etc.) are rarely available. Furthermore, there is little consistency (i.e. pattern of chemical use) between different production species, production systems, or countries. The use of chemicals is regulated by the legislation of each country, and thus, a chemical that is legal in one country can be considered illegal in other country. Regulations related to the requirement to publically report chemical use are also inconsistent among countries (BurrIDGE et al. 2010).

Existing regulatory controls or management measures on chemical use are typically restricted to the types of treatments permitted and their method of use (e.g. “responsible” use under veterinary supervision), but often do not limit the frequency or total use of chemicals. Seafood Watch will not defer to regulations or other management measures as a proxy for “sustainable” chemical use unless they include robust limits on total use, or the permitted use of those chemicals has been justified by monitoring and assessment of ecological impacts.

The score of this criterion is based on the evidence of the use of chemicals, and the risk of their incorporation into the receiving environment, dictated by the openness of the facilities. Closed production systems that do not discharge chemicals or their by-products, systems that present evidence of no use of chemicals over multiple 3 or more production cycles, or systems in which effluent treatment does not allow chemical discharge to present concern, earn the highest score (10 out of 10) in the scoring table. In contrast, the use of illegal chemicals, the use of antimicrobials critically important for human medicine in significant

~~quantities~~chemicals that have a high risk to human health, or a negative impact on non-target organisms beyond an allowable zone of effect register the lowest score (0 out of 10).

Criterion 4 may be scored as Critical if there is evidence of pathogens with developed ~~clinical~~ resistance to ~~chemicals-antimicrobials~~ that are highly important or critically important for human medicine, ~~there is use of critically important antimicrobials in unknown quantities, or~~ if there is illegal use of chemicals that results in negative ecological impact.

Trend adjustment

This criterion assesses current chemical use and does not assess the risk that chemical use *could* increase in the future (for example, in response to a future disease outbreak). In addition, the trend adjustment option recognizes decreasing trends in chemical use while still reflecting the overall quantity and frequency of use of chemicals in an industry. If data show a decline in chemical use over time sufficient to give confidence that improving management practices are leading to clear reductions in use and the risk of impacts, a positive adjustment of up to 2 points can be applied based on the duration and rate of the decline and the current level of use where a clear reduction in concern is justified. For example, an assessment scoring 2 out of 10 due to “Occasional, temporary or minor evidence of impacts to non-target organisms beyond an allowable zone of effect” could increase their score to 4 out of 10 if it is demonstrated that there is an ongoing decreasing trend in the quantity and frequency of use of chemicals over the last decade that signifies improvements in management practices.

There is a minimum of 5 years for a trend adjustment to be applicable based on the assumption that any timeframe less than 5 years could be considered “coincidence.” Continued decrease in chemical use between 5-10 years can be recognized with increasing adjustment up to 2 points. The trend adjustment does not apply to a Critical base score.

Assessment Guide

The criterion is structured flexibly to allow for the typical poor availability and low confidence in chemical use data.

Chemical treatments of concern relevant to this criterion are broadly defined as those products used in aquaculture to kill or control aquatic organisms, and/or whose use may impact non-target organisms or raise concerns relevant to human health. It does not include chemicals such as mercury, PCBs, dioxins or other environmental contaminants associated with feed ingredients and those are not assessed in the Seafood Watch Aquaculture Standard. Chemicals such as anti-foulants, anesthetics and others can be accounted for in this assessment when there is evidence of impacts.

Scale:

- ~~— Farm-level assessments — apply this criterion to the farm being assessed but consider the farms contribution to cumulative impacts relative to neighboring farms.~~
- ~~— Regional or national assessments — apply to relevant regional, national, or eco-certification statistics or impacts, or use data from “typical” or “average” farms.~~

If data on chemical use (e.g. types, quantity) or evidence of impacts (e.g. development of resistance, impacts to non-target species) are available, use it to determine the appropriate score

from the following table. If robust data are not available, use the options based on the species or production system characteristics as a proxy for an assessment of risk.

Consider **ALL** the options in the following table and determine the appropriate level of concern before scoring. If chemical use (e.g. type or quantity) and/or impacts are unknown, use the production system-based options. While every eventuality may not be covered in the table, use the examples as guidelines to determine the most appropriate score.

Polyculture systems

For assessments concerning polyculture systems, the cumulative impact of all chemicals used in the system will be considered.

Trend adjustment

If data show a decline in chemical use over time sufficient to give confidence that improving management practices are leading to clear reductions in use and the risk of impacts, a positive adjustment of up to 2 points can be made based on the duration and rate²⁹ of the decline and the current level of use where a clear reduction in concern is justified.

The trend adjustment does not apply to a Critical base score.

Concern	Chemical Use Examples	Score
No concern	▪ The production system is closed and does not discharge active chemicals or by-products (e.g. antibiotic resistant bacteria), or; ▪ The data score for chemical use is 7.5 or 10 of 10 and data show that chemical treatments have not been used over multiple-3 or more production cycles, or; ▪ The method of treatment does not allow active chemicals or by-products to be discharged, or;	10
Low	▪ The data score for chemical use is 7.5 or 10 of 10 and data show that chemical treatments are used on average less than once³⁰ per production cycle or once per year for longer production cycles, or; ▪ The production system does not discharge water over multiple production cycles, or; ▪ Evidence of no impacts on non-target organisms, or;	8
Low-moderate	▪ Specific data may be limited, but the species or production systems have a demonstrably low need for chemical use, or; ▪ Evidence of only minor impacts on non-target species within the allowable zone of effect (i.e. no population-level impacts), or;	6

²⁹ Duration and rate definition: for example, a 5-year trend with a rate of decline sufficient to give confidence that improving management practices are leading to clear reductions in chemical use and the risk of impacts = 1 point; 10 years = 2 points

³⁰ **Seeking public comment on a definition for a 'single treatment'**

	▪ The production system has very infrequent or limited discharge of water (e.g., once per production cycle or < 1% per day).	
Moderate	▪ Occasional, temporary or minor³¹ evidence of impacts to non-target organisms beyond an allowable zone of effect, or; ▪ Some evidence or concern of <u>clinical</u> resistance to chemical treatments, or; ▪ Regulations, management or mitigation measures with demonstrated effective enforcement are in place that limit the frequency of use and/or total use of chemicals, or their impacts	4
Moderate-high	▪ Chemicals are known to be used on multiple occasions each production cycle and the treatment method allows their release into the environment, or; ▪ Chemical use (type and/or volume) is unknown but the production viability is considered to be dependent on chemical intervention, and the treatment method allows their release into the environment, or; ▪ Regulatory limits on chemical type, frequency and/or dose exist with unknown enforcement effectiveness³², or; ▪ Confirmed cases of <u>clinical</u> resistance to chemical treatments with no effective mitigation measures, or; ▪ <u>Chemicals-Antimicrobials</u> highly important to human health³³ are being used in significant³⁴ or unknown quantities.	2
High	▪ Illegal chemicals (as defined by the country of production) are used beyond exceptional cases³⁵, or; ▪ Chemicals critically important to human health³⁶ are being used in significant³⁷ or unknown quantities, or; ▪ Negative impacts of chemical use seen on non-target organisms beyond an allowable zone of effect.	0
Critical	▪ Evidence of developed clinical resistance to <u>antimicrobials chemicals</u> (e.g. loss of efficacy of treatments) that are highly important or critically important to human health, or; ▪ <u>Illegal activities with demonstrable, persistent, negative environmental impacts.</u> ▪ <u>Antimicrobials critically important for human medicine³⁸ are being used in unknown quantities.</u>	C

³¹ Refers to impacts to individual animals only (no population level impacts).

³² While limits may exist, Seafood Watch does not defer to regulation as a proxy for ecological conservation

³³ Highly important chemicals listed in - http://www.who.int/foodborne_disease/resistance/cia/en/ have been used in the current or previous production cycle.

³⁴ Significant definition: the average frequency of use of the farms being assessed is more than once per production cycle, or if data on the total volume of antibiotic use (if this is the only data available) imply the same (estimated).

³⁵ Exceptional cases definition: use is clearly limited to a small minority of producers in an industry, or the frequency of use at the farm-level is less than once in a three year period.

³⁶ Critically important chemicals listed in - http://www.who.int/foodborne_disease/resistance/cia/en/ have been used in the current or previous production cycle.

³⁷ Significant definition: the average frequency of use of the farms being assessed is more than once per production cycle, or if data on the total volume of antibiotic use (if this is the only data available) imply the same (estimated).

³⁸ Critically important antimicrobials listed in - http://www.who.int/foodborne_disease/resistance/cia/en/

*Note: Intermediate values (i.e., 1, 3, 5, 7, or 9) may be used when justified or needed.

Chemical use score = _____ (range 0–10 or Critical)

Trend adjustment = _____ (range 0-2)

Final Chemical use criterion score = _____ (range 0-10 or Critical)

Criterion 5 - Feed

Impact, unit of sustainability and principle

- *Impact:* Feed consumption, feed type, ingredients used, and the net nutritional gains or losses vary dramatically between farmed species and production systems. Producing feeds and their ingredients has complex global ecological impacts, and the efficiency of conversion can result in net food gains or dramatic net losses of nutrients. Feed use is considered to be one of the defining factors of aquaculture sustainability.
- *Unit of sustainability:* The amount and sustainability of wild fish caught for feeding to farmed fish, the global impacts of harvesting or cultivating feed ingredients, and the net nutritional gains or losses from the farming operation.
- *Principle:* Sourcing sustainable feed ingredients and converting them efficiently with net edible nutrition gains.

REQUEST FOR COMMENT

The subject of feed ingredient selection and sourcing, and the merits of using different types of ingredients in aquaculture feeds is enormously complex. The current Feed Criterion is also complex and requires a large amount of data, analyst assessment time, and review time. As such, several important changes are being proposed to this criterion for discussion.

Changes were not tracked in this criterion in order to improve its readability, as much of the text has changed. Please read the entire background and rationale, as well as the content of each factor and relevant scoring.

Four comment boxes are provided below in Factor 5.1 (Wild Fish Use) with regard to the scoring of FFER in general, on the scoring of by-products, and on adjustments to the sustainability scores.

One comment box is also provided in Factor 5.2 (Net Protein Gain or Loss) with regard to the scoring of edible and non-edible feed ingredients.

Three comment boxes are provided for Factor 5.3 (Feed Footprint) with regard to proposed changes to the existing ocean and land area surface calculations.

Comments:**Background and Rationale**

Feed continues to be a major factor affecting the sustainability of aquaculture, especially in intensive systems that rely entirely on external feeding. The globalization of the aquaculture industry requires that feed ingredients are often sourced from locations distant to the aquaculture operations (Lebel et al. 2002), and while marine ingredients have traditionally been the focus of concern (Naylor & Burke, 2005), the production and common use of terrestrial ingredients (crop and livestock-derived) and emerging use of 'alternative' ingredients (e.g. insect meals/oils, algal meals/oils, single-cell proteins, etc.) also have impacts on the environment. As the substitution of marine ingredients in aquaculture feeds increases, it becomes more important to account for their impacts (Boissy et al. 2011).

The Seafood Watch Feed Criterion assesses three core aspects of feed use:

1. The use of wild fish
2. The net protein gain or loss
3. The 'global impact' of feed production

The combination of these three aspects allows a thorough assessment of the driving forces leading to more sustainable practices. For example, the structure of the equations allow the following variety of practical feed aspects to be assessed:

- The efficiency of using wild fish to produce farmed fish
- The use of sustainable or unsustainable sources of fishmeal and oil
- The use of crop, animal, and emerging 'alternative' ingredients to replace aquatic fishmeal and oil
- The net gain or loss of protein from the aquaculture operation
- The carbon intensity of feed production

Feed formulations are still typically considered proprietary and ingredient sources change frequently; therefore, this criterion must work with very limited data if necessary, but also encourage greater data availability by rewarding access to better feed composition information.

These core aspects and their components are designed to work within the practical limits of data availability and allow a comprehensive assessment of feed use in aquaculture at any scale.

The Seafood Watch Feed Criterion is only applied to production systems that provide external feeds of some kind; that is, species such as bivalve shellfish or fish or shrimp grown in extensive ponds with no additional feed are scored 10 out of 10.

By-product and non-edible feed ingredients

Robustly assessing the use of by-product ingredients (e.g. fisheries or land-animal by-products) in aquaculture feeds is enormously complex. The factors associated with their economic allocation as by-products (i.e. something produced incidentally to the production process) or as co-products (any of two or more product outputs from a production process), are complex, as are the factors determining the ecological impact of their harvest (i.e. the ecological value of fish viscera versus fish fillets of low/high economic value respectively). The economic value of poultry by-products is low, whereas the ecological cost of production is high (i.e. chicken feed is needed to make both chicken breasts and chicken viscera). Both have high nutritional values.

A similarly complex debate revolves around the allocation of by-products, and many other important “whole” or co-product feed ingredients as “edible” or “non-edible” with regard to their suitability for human consumption either in their original form (e.g. Peruvian anchovy or soy beans) or their processed forms (fish meal or oil, and soybean meal or oil), and the use of land to grow “edible” food or feed-grade crops. Many, if not all, feed ingredients are considered physically or culturally inedible due to their inputs and/or processing (e.g. feed-grade soybean meal, dried distillers grains, feather meal, fishmeal sourced from by-products, insect meal fed food wastes, methanotrophic microbes, etc.). On the other hand, when considering the opportunity cost of production, it is possible to argue that all of these ingredients may be considered edible (e.g. growing and/or processing food-grade crops, extracting edible protein from animal and vegetable ‘wastes’, etc.).

While focusing on the ecological impacts, Seafood Watch does not intend to incorrectly incentivize the perverse use of one feed ingredient over another, and in recognition of the complexities described (which dictate that the incentives for using one ingredient versus another can never be accurately predicted), Seafood Watch assesses all ingredients equally, regardless of their apparent economic or social designation as “by-products”.

Factor 5.1 – Wild Fish Use

This factor combines the amount of whole fish used in feeds with the sustainability of the source fishery to give a measure of “wild fish use”.

While it is acknowledged that the common measures of whole fish use (i.e. the Feed Fish Efficiency Ratio, FFER) are not perfect, Seafood Watch uses the “academic” equation (e.g. Naylor et al. 2009) as opposed to the “industry” equation (e.g. Jackson, 2009). This equation provides a simple measure from first principles of the number of tons of wild fish that must be caught to produce one ton of farmed fish.

The sustainability of the source fishery is a basic assessment that uses commonly available metrics that avoid the need for an independent fishery assessment.

Due to the importance of sustainably using marine feed ingredients in aquaculture, Factor 5.1 has several Critical decision points (listed for all criteria at the end of this standard) based on the use of highly unsustainable sources of fishmeal and fish oil, or the combination of a high use of marine ingredients and low protein conversion efficiency.

Factor 5.2 – Net Protein Gain or Loss

Seafood Watch principles note the importance of efficiently converting feed into seafood products. Aquaculture typically results in an overall net loss of protein of varying degrees depending on the species farmed, the feed formulation, and the production system. Crompton et al. (2010) concluded that aquaculture (in their case salmon) can be a net producer of fish protein and oil, but the authors only considered the fish protein inputs (ignoring all the other sources of protein in the feed). By considering all the other sources of protein included in the feed (in addition to fish protein), this criterion will demonstrate that in many forms of fed aquaculture, there is an overall (and frequently substantial) net loss of protein. A Critical score is assigned if there is a net loss of protein >90% (i.e., score 0 of 10 for Factor 5.2). The equations for the net protein efficiency of the fish farming process are based on the feed protein inputs and the harvested fish protein outputs.

Factor 5.3 – Feed Footprint

As mentioned previously, many, if not all, feed ingredients are considered physically or culturally inedible for a variety of reasons (e.g. lack of consumer demand, processing, food safety, etc.), and it is also recognized that while these ingredients are not considered fit for human consumption, they too have an ecological cost of production. These ecological costs span a variety of potential direct and indirect environmental impact categories, including global warming potential via carbon emissions throughout their production and processing.

Factor 5.3 uses the feed ingredient composition to determine the inclusion levels of each ingredient (or basic groups of ingredients – aquatic, crop, land animal) and estimate the global warming potential (CO₂-eq including land use change (LUC)) of the feed used to produce one ton of fish.

This factor utilizes life cycle assessment (LCA) data from the Global Feed Lifecycle Institute (GFLI)³⁹ database, a publicly available database⁴⁰ which provides high quality data covering cultivation, processing, and logistics for nearly 1,000 unique feed ingredient products. The GFLI is a feed industry initiative that arose in 2016 out of the need to measure the environmental impact of the feed and livestock sectors with a global scope, and its members include major feed and ingredient manufacturers^{41, 42}. The GFLI methodology follows guidelines developed by the FAO Livestock Environmental Assessment and Performance (LEAP) Partnership, and Product Environmental Footprint (PEF) methodology guidelines developed by the European Commission, ensuring compliance with recognized LCA methodology requirements.

³⁹ <http://globalfeedlca.org/>

⁴⁰ <https://tools.blonkconsultants.nl/tool/gfli/>

⁴¹ <http://globalfeedlca.org/gfli-members/our-members/>

⁴² <http://globalfeedlca.org/wp-content/uploads/2017/03/full-paper-GFLI-food-LCA-2016-final.pdf>

The background datasets included in this database are the United States Life Cycle Inventory (USLCI) and European reference Life Cycle Database (ELCD), with data included from additional datasets proven to be compliant with GFLI methodology. While this database is continuously being updated (as of August 2019, most recently in July 2019), there are still gaps – such as datasets covering Asian feed ingredient production. Despite these current gaps, this database is currently the strongest publicly available reference for feed ingredient LCA data and is used to assess global warming potential of feed ingredients in this Factor.

Feed Criterion Final Score

The final score is the average of the three factor scores with a double-weighting on the wild fish use factor (F5.1). The double-weighting is used because Seafood Watch considers the direct harvest of wild fish to be the primary environmental concern of aquaculture feeds compared to the terrestrial production of feed ingredients from crops and land animals. If Factor 5.1 or Factor 5.2 has scored Critical, the final score for the Feed criterion will be Critical and the final recommendation of the assessment will be Avoid.

Assessment instructions:

This criterion is only applied to those aquaculture operations that use external feed. If no external feed is applied, the score is 10 out of 10.

Step 1

- Determine the appropriate feed crude protein, economic feed conversion ratio (eFCR) and feed ingredient composition for the farm, farms, region or industry being assessed, and fill in the table below. Use “average” feed composition(s) where necessary, or split the assessment into different recommendations if feed types lead to different scores and overall ratings.

Feed crude protein: _____ %

Economic feed conversion ratio (eFCR): _____

Feed ingredients (please list ingredient and country of origin)	Feed type 1 Ingredient inclusion %	Feed type 2 Ingredient inclusion %	Add columns as necessary
Fish meal			
(add rows as necessary)			
Fish oil			
(add rows as necessary)			
Vegetable/crop ingredient(s)			
(add rows as necessary)			
Land animal ingredient(s)			
(add rows as necessary)			
Alternative ingredient(s) (e.g. insect meal, microbe meal, algae oil, etc.)			
(add rows as necessary)			

Feed: Factor 5.1 – Wild fish use

REQUEST FOR COMMENT

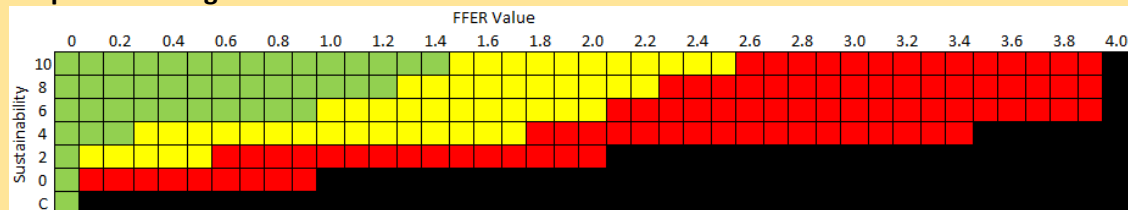
Replacing the Wild Fish Use scoring equation

With regard to the Monterey Bay Aquarium’s focus on marine conservation, proposed changes to Factor 5.1 restructure the “Wild Fish Use” score based on an increasing influence of the “Sustainability Score” of the source fishery. The current Wild Fish Use score is based on a somewhat complex equation that combines the FFER score (from 0-10), the FFER value and the Sustainability Score. It is not considered to robustly reflect the conservation concerns associated with source fisheries with poor sustainability.

The proposed change uses a manually constructed matrix based on the FFER value and the Sustainability score (0-10) of the source fishery. This is both simpler, and better able to reflect the conservation ethics and the associated scoring decision points of Seafood Watch.

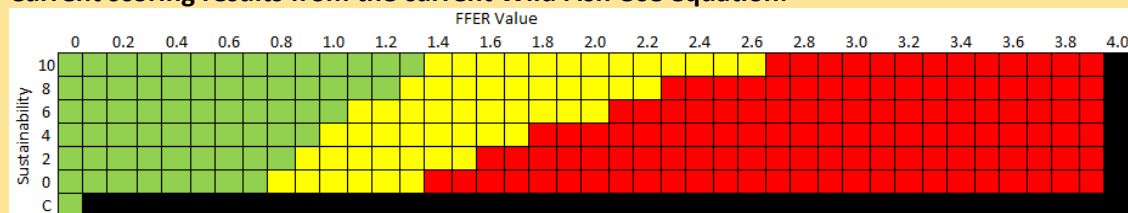
The new scoring table is based on a series of decision points associated using the simple concept of high, medium and low concern (red, yellow, green, and black for “critical”) and an associated spread of scores from 0 to 3.3 as a low concern, 3.4 to 6.6 as medium concern and 6.7 to 10 as low concern. These create several scoring thresholds between critical/low, low/medium and medium/high, and these combinations of FFER and sustainability score have been used to manually lay out the following table (the sustainability scoring table is as shown in Factor 5.1b below).

Proposed scoring table:



For reference, the existing Wild Fish Use equation generates the following spread of red/yellow/green scores.

Current scoring results from the current Wild Fish Use equation:



The proposed table (i.e. the first table above) better reflects the increasing conservation concern regarding the use of unsustainable source fisheries, even at lower FFER values. This

manual table also allows a better reflection of critical conservation concerns based on high use or highly unsustainable sources. The numerical scores from 0-10 corresponding to these color ranges are populated by hand as shown in the proposed Factor 5.1 numerical scoring table in the standard below.

Please provide comment on:

1. Do you agree with this approach?
2. Is the increased penalty for less sustainable source fisheries justified, even at low FFER values?
3. How could this approach be improved?

Comments:

REQUEST FOR COMMENT

Removing by-product ingredients from the FFER scoring

An additional proposal for discussion is to recognize the ecological cost of fishmeal and fish oil produced from by-products of fish that have already been caught for human consumption, and to include them in the FFER calculation. These ingredients from by-products have a low economic value compared to whole-fish fish meal and oil (or to the fillets from which they were separated) but have an equal ecological cost of production with regard to their removal from aquatic ecosystems. These by-product feed ingredients are not currently included in the calculation for FFER, and the proposal (for discussion) is to include them. As compared to only using whole-fish ingredients in the calculation, this would result in higher calculated FFER values and therefore reduce the Wild Fish Use score.

Please provide comment on:

1. Other schemes continue to ignore the use of by-product ingredients in feed calculations, and the use of by-product ingredients to grown farmed fish is currently logical to society; however, it ignores the true ecological cost of these ingredients. We welcome comments on this approach.

Comments:

A measure of the amount of wild fish used to produce farmed fish, combined with the sustainability of the fisheries from which they are sourced. Factor 5.1 combines the amount of wild fish used (Factor 5.1a) with the sustainability of the source fishery (Factor 5.1b) to give a score from 0-10 for “wild fish use”.

Factor 5.1a – Feed Fish Efficiency Ratio (FFER)

A measure of the dependency on wild fisheries for feed ingredients using the ratio of the amount of wild fish used in feeds to the harvested farmed fish.⁴³

Use the best available (most recent or relevant) data:

- a) Fishmeal inclusion level* = _____ %
- b) Fish oil inclusion level* = _____ %
- c) Fishmeal yield % = _____ (use 22.5⁴⁴ if value is unknown)
- d) Fish oil yield % = _____ (use 5.0⁴⁴ if value is unknown)
- e) Economic FCR⁴⁵ = _____

**Note on the use of whole (unprocessed) or ‘trash’ fish for feed – If whole fish are used as feed, the eFCR effectively determines the FFER value. Use eFCR as the FFER value (or entering 22.5 as the FM inclusion level and 5 for FO in the equations along with the eFCR will give the same result).*

Fishmeal and fish oil yield values:

The calculation of the FFER requires the input of the yield values for fishmeal and fish oil. Yield values that are commonly used in key literature and by industry are 22.5% for fishmeal and 5% for fish oil (Peron 2010, Tacon & Metian 2008).

⁴³ Also commonly referred to as the FFDR – Forage Fish Dependency Ratio or FIFO – Fish In : Fish Out Ratio

⁴⁴ Yield values from Tacon and Metian (2008). Other (similar) values are possible from Peron et al. (2010), but data clarity is not sufficient for a robust quantification of fishery landings.

⁴⁵ Economic FCR or eFCR = total feed used divided by total harvest of fish.

$$FFER_{\text{FishMEAL}} = \frac{a \times e}{c} = \underline{\hspace{2cm}}$$

$$FFER_{\text{Fish Oil}} = \frac{b \times e}{d} = \underline{\hspace{2cm}}$$

Final FFER value = the greater value of FFER_{FishMEAL} or FFER_{Fish OIL}

Final FFER value = _____

Factor 5.1b – Source fishery sustainability

A simple measure of the sustainability of the fisheries providing fishmeal and fish oil.

Using an average, or annual weighted mass-balance estimate of the fishery sources used in a typical feed, decide the appropriate sustainability score according to the following descriptions and examples.

REQUEST FOR COMMENT	
Adjustments to Source Fishery Sustainability scoring table: In the Source Fishery Sustainability table below, minor adjustments have been made, particularly to scores for MSC-certified fisheries. Previously, the number of conditions in some certified fisheries had been a concern that warranted separation into “no conditions”, “minor conditions”, and “major conditions”, but this is no longer justified due to the complexities of the condition process within the MSC certification scheme. MSC-certified fisheries are reduced in score slightly and separated simply by “with” or “without” conditions. Please provide comment on: 1. These adjustments, as well as on all scoring categories in this table.	
Comments:	

Score	Fishery Sustainability Examples
10	SFW Green. Demonstrably sustainable. ⁴⁶ FishSource scores all > 8. Fishery exceeds all reference points and has no significant concerns.
8	MSC certified without conditions. All FishSource scores ≥ 6 and must be ≥ 8 on “Stock Health”. Fishery meets or is close to all reference points with only minor concerns.
6	SFW Yellow. All FishSource scores ≥ 6. MSC certified with conditions. Fishery does not meet all reference points or has some significant concerns.
4	IFFO certified ‘Responsible’. FAO Code of Conduct compliant (independently verified). One FishSource score < 6.
2	SFW Red. More than one FishSource score < 6. Unknown sustainability. Fishery does not meet reference points or has significant concerns regarding bycatch or ecosystem impacts.
0	Unknown source fishery. Demonstrably unsustainable (e.g., overfished with overfishing occurring). Fishery source information deliberately withheld. Evidence that source of terrestrial ingredients from agriculture is known to destroy high value habitat.
Critical	SFW Red with a Critical score. Evidence that 25% or more of fishery is illegal, unregulated or unreported ⁴⁷ . Fishery has unacceptable bycatch or ecosystem impacts. The assessed aquaculture operations generate or cumulatively contribute to unacceptable fishery practices (e.g. small mesh mixed trawl fisheries).

Source fishery sustainability score = _____ (range 0 to 10)

The final Wild Fish Use score is determined by selecting the appropriate score from the tables using the FFER value and the Sustainability Score.

⁴⁶ On a realistic and pragmatic basis – i.e., the best current understanding of fishery sustainability (accepting that ecosystem-based forage fishery management is not yet fully developed).

⁴⁷ These fisheries are likely cited by peer reviewed literature, government reports, etc. Analyst can also refer to Seafood Watch report on that fishery for information.

REQUEST FOR COMMENT

Adjustments to Source Fishery Sustainability scoring table:

Note: The previous scoring equation has been removed, and these are the proposed new scoring tables, including numerical scores (but without the red/yellow/green highlights), as discussed at the beginning of this criterion.

	FFER Value																				
SS	0.0	0.1	0.2	0.3	0.4	0.5	0.6	0.7	0.8	0.9	1.0	1.1	1.2	1.3	1.4	1.5	1.6	1.7	1.8	1.9	2.0
10	10.0	9.8	9.5	9.3	9.1	8.9	8.6	8.4	8.2	8.0	7.7	7.5	7.3	7.1	6.8	6.6	6.4	6.1	5.7	5.4	5.1
8	10.0	8.3	8.2	8.0	7.9	7.7	7.6	7.5	7.3	7.2	7.0	6.9	6.7	6.6	6.4	6.1	5.7	5.4	5.1	4.7	4.4
6	10.0	7.6	7.5	7.4	7.3	7.2	7.1	7.0	6.9	6.8	6.7	6.5	6.2	5.8	5.5	5.1	4.8	4.4	4.1	3.7	3.4
4	10.0	6.9	6.8	6.7	6.5	6.2	6.0	5.8	5.5	5.3	5.1	4.8	4.6	4.3	4.1	3.9	3.6	3.4	3.2	2.7	2.3
2	10.0	4.5	4.2	4.0	3.7	3.4	3.2	2.8	2.5	2.1	1.8	1.4	1.1	0.7	0.4	0.0	0.0	0.0	0.0	0.0	C
0	10.0	2.5	2.0	1.5	1.0	0.5	0.0	0.0	0.0	0.0	C	C	C	C	C	C	C	C	C	C	C

	FFER Value																			
SS	2.1	2.2	2.3	2.4	2.5	2.6	2.7	2.8	2.9	3.0	3.1	3.2	3.3	3.4	3.5	3.6	3.7	3.8	3.9	4.0
10	4.7	4.4	4.1	3.7	3.4	3.2	3.0	2.7	2.5	2.3	2.1	1.8	1.6	1.4	1.1	0.9	0.7	0.5	0.2	C
8	4.1	3.4	3.2	2.9	2.7	2.4	2.1	1.9	1.6	1.3	1.1	0.8	0.5	0.3	0.0	0.0	0.0	0.0	0.0	C
6	3.2	2.8	2.4	2.1	1.7	1.4	1.0	0.7	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	C
4	1.8	1.4	0.9	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	C	C	C	C	C	C
2	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C
0	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C	C

Please provide comment on:

1. These adjustments to the scoring table.

Comments:

Factor 5.1 – Wild fish Use Score = _____ (range 0–10)

Feed: Factor 5.2 – Net protein gain or loss

A measure of the net protein efficiency of the fish farming process based on the feed protein inputs and the harvested fish protein outputs.

REQUEST FOR COMMENT

As the edits to the Background and Rationale section at the start of this criterion show, Seafood Watch is proposing for discussion to consider all protein ingredients equivalent, regardless of other commercial or perceived societal designations as “by-products” or “non-edible”. This will greatly simplify Factor 5.2, and remove the “free pass” to the use of ingredients that have a high ecological cost of production (e.g. land animal by-products). It will also give a simple clear indicator of the conversion efficiency of aquaculture feed using a widely understood metric (i.e. net protein loss).

Simplifying this factor removes several aspects previously assessed, including:

- The percent of total protein from “edible” ingredients
- The percent of total protein from “non-edible” ingredients
- The percent of total protein from crop ingredients
- The conversion of crop proteins to animal proteins
- The yield of the harvested fish
- The percentage of the harvested fish by-products further utilized.

These typically involved detailed and/or lengthy data requests and complex calculations, and required intensive analyst and reviewer time.

The proposed equation goes back to basics and simply assesses the net protein loss from the feed inputs and the harvested fish outputs, while incorporating eFCR. At this time, the proposal does not include adjustments to the scoring categories at the end of this criterion (i.e. the conversion of a % net protein gain or loss to a 0-10 score. For example, a net protein loss of >90% (including “non-edible” ingredients) scores 0 out of 10.

Please provide comment on:

1. We welcome comments on this approach.

Comments:

The net protein gain or loss is calculated according to the following basic equation:

Net Protein = (Harvested Protein Output – Feed Protein Input) / Feed Protein Input

Where:

- Feed Protein Input = % protein content of feed x eFCR
- Harvested Protein Output = % protein content of whole harvested fish

The % protein content of feed should be readily available from the feed company or technical data sheets (and printed on every feed bag), or relevant examples should be available in the scientific literature. The feed protein content can vary considerably over the production cycle; ideally, a weighted average feed protein content would be used for the full cycle. Alternatively, use the protein content from the main (i.e. bulk) growout feeds. The protein contents of whole harvested fish are available from the literature.

Net protein gain is indicated by a positive result, and net protein loss is indicated by a negative result.

Final Factor 5.2 Calculation

Net Protein = [Harvested fish protein content % – (feed protein content % x eFCR)] / (feed protein content % x eFCR) x 100

Net protein gain = _____ % (indicated by positive result) OR

Net protein loss = _____ % (indicated by negative result)

	Protein Gain or Loss (%)	Score
Net protein gain	> 0	10
Net protein loss	0.1–9.9	9
	10–19.9	8
	20–29.9	7
	30–39.9	6
	40–49.9	5
	50–59.9	4
	60–69.9	3
	70–79.9	2
	80–89.9	1
	> 90	0

Factor 5.2 score = _____ (range 0–10). This is Critical if the score = zero

Feed: Factor 5.3 – Feed footprint

An approximate measure of the global resources used to produce aquaculture feeds based on the global warming potential (CO₂-eq including land use change (LUC)) of the feed ingredients necessary to grow one ton of farmed fish.

REQUEST FOR COMMENT

An additional proposal for discussion is to recognize the carbon intensity (via the metric of global warming potential) of feed applied to aquaculture systems. Previously, Factor 5.3 approximated the ocean and land area appropriated by feed ingredients required to produce one ton of fish, using global average values for crop, land animal, and marine ingredients. This

approach produced broad estimates without capturing the ecological context of land value (e.g. 10 ha of Amazonian rainforest is of higher ecological value than 10 ha of desert). New databases are available that enable a more precise approach in approximating appropriated land area, and further, approximating the global warming potential using life cycle assessment data (mass-based allocation). Please review the updated background and rationale in this section for further details regarding the database(s) referenced.

Given the concern regarding carbon emissions and climate change, the use of a mass-based global warming potential including land use change (LUC) as an indicator provides a universal metric applicable across all feed ingredients, including novel alternative ingredients, to measure ecological impact at the global scale, while incorporating the necessary context of land value with regard to carbon sequestration and, indirectly, ecosystem services and biodiversity.

Please provide comment on:

1. Do you agree with this approach?
2. How could this approach be improved?

Comments:

To complete this Factor, the following calculation is performed for each ingredient of >2% inclusion in the feed (or for all ingredients if data are available):

- a. Global warming potential (including LUC) for ingredient X = ____ kg CO₂ eq kg⁻¹ product (from the GFLI database mass-based allocation⁴⁸)
- b. Contribution for ingredient X = (a) x (% inclusion level in feed) / 100 = _____ kg CO₂ eq from X in kg feed⁻¹)
- c. Sum of inclusion level of all ingredients assessed = _____ % (i.e. if all ingredients >2% add up to 85% of the total feed, then the value here is 85%)

⁴⁸ The GFLI database can be accessed as an Excel file and downloaded here (with free registration) <https://tools.blonkconsultants.nl/tool/gfli/>. Download the "List of impacts (ReCiPe) (July 2019)" or more recent version, and select the "Mass Allocation" worksheet.

Criterion 6 – Escapes

Impact, unit of sustainability and principle

- *Impact:* Competition, altered genetic composition, predation, habitat damage, spawning disruption, and other impacts on wild fish and ecosystems resulting from the escape of native, non-native and/or genetically distinct fish or other unintended species from aquaculture operations.
- *Unit of sustainability:* Affected ecosystems and/or associated wild populations.
- *Principle:* Preventing population-level impacts to wild species or other ecosystem-level impacts from farm escapes.

Request for Comment

In areas where native species are farmed, but are genetically distinct from wild conspecifics, a concern for genetic introgression is currently captured in the scoring table. This risk is increased when the native stocks are considered vulnerable or endangered but was not previously captured in the scoring table.

Please provide feedback on

1. The additional scoring example added to the 'high concern' score (0) for the table in factor 6.2.
2. Guidance for polyculture assessments that has been inserted into the assessment guide.

Comment:**Background and Rationale**

There is a growing body of evidence which demonstrates the negative impacts of the escape of some aquaculture species. The introduction of native or non-native escapees from aquaculture sites can threaten ecosystem integrity. Despite its importance, the specific impacts of escapees are usually difficult to predict because of the inherent difficulty in accurately documenting the number of escapes and, furthermore, assessing their impacts (Naylor et al. 2001, Simberloff 2005).

Robust data on escape numbers are rarely available due the difficulty of counting total numbers of fish at stocking and harvest and knowing what proportion of any loss is due to mortalities versus escapes. Data collection and reporting of escapes (both escape 'events' and chronic trickle losses) are very rarely robust, and monitoring for the presence of escapees in the wild is typically rare. In addition, many farmed species are broadcast spawners and spawning during the production cycle represents a potentially significant source of escapees in open systems.

The Escapes Criterion is therefore developed to assess the risk of escape from the production system, and the risk of invasiveness and potential ongoing impact to the surrounding ecosystem of those escapes.

Factor 6.1

Factor 6.1 assigns a level of risk to each type of production system based on the ability of farmed species to escape the system and enter the surrounding ecosystem. Production system escape risks are categorized as Low to High based on openness, management practices, escape trends, and vulnerability to environmental factors (e.g. tsunami, flood, predator damage, etc.).

Systems that are more open to the environment have an inherently higher risk of escape, however, it is recognized that improved technologies and management practices can result in lowering that risk. For example, adjustment of a “moderate-high” risk (Red) to a “moderate” risk (Yellow) can be employed if it can be demonstrated that improved technology and management of high-risk systems has resulted in a decrease of escapes to a level that does not pose a threat to wild, native populations.

In addition, an adjustment can be made to the Escape Risk score, of up to 10 points, to allow for the recapture of escapes where evidence shows that the reduction in escape numbers occurs before they have an impact⁴⁹, or where the reduction would lead to a reduced risk of impact.

Factor 6.2

Invasiveness, referred to as the risk of competitive and genetic interactions (CGI), is defined as “...the degree to which an organism is able to spread from site of primary introduction, to establish a viable population in the ecosystem, to negatively affect biodiversity on the individual, community, or ecosystem level and cause adverse socioeconomic consequence” (Panov et al. 2008). According to this definition, Factor 6.2 considers both the short-term and long-term ecological impacts of escape. This factor has been adapted (and greatly simplified) from the [Marine Fish Invasiveness Screening Kit \(MFISK\)](#) (and other similar tools developed by Copp et al. (2007, 2009)), and from the Global Aquaculture Performance Index (GAPI)’s similar use and adaptation of the same tools (Volpe et al. 2013).

The risk of impacts resulting from repeated escapes of farmed stock (regardless of their ability to establish), or the risks resulting in the establishment of escapees differs according to species-specific characteristics, and particularly between native and non-native species. While the escape of native species is often considered to be less harmful to the environment than the escape of non-native species, this characteristic alone is not enough to estimate the extent of their impacts.

Native

In the case of native species, the Competitive and Genetic Interactions (CGI) impact of their escape is related to the genetic differences between farm-origin escapees and their wild conspecifics, and also to other direct ecological impacts such as competition, predation, and spawning competition or disturbance. Native farmed species differ genetically from wild populations as a function of the number of generations that separates them from wild individuals and are a result of the artificial selection of traits that are beneficial to aquaculture

⁴⁹ For example, if the main impact of farmed salmon escaping from sea cages occurs when they migrate into rivers, then mortality prior to reaching rivers can be included where it demonstrably leads to a reduction in the overall impact of the escapes.

producers. Selection for few, specific aquaculture-related traits typically results in phenotypic changes such as body size or age at sexual maturity and a lower diversity of traits that are beneficial to wild fish (i.e. the balance of growth rate, disease resistance, reproductive success, predator avoidance, etc.). Genetic introgression of farm-origin fish into wild genotypes can result in a loss of balance in these fitness-related traits, which may subsequently alter the overall fitness and dynamics of wild populations. Therefore, if farmed fish are of one generation of domestication or less (i.e. naturally-settled shellfish spat, wild-captured juvenile finfish), the escapees will pose no threat to altering the genetic make-up of the still-wild population. In contrast, the escape of fish raised in hatcheries for more than one generation presents higher concerns as a result of their potential to impact the genetic structure and demographic dynamics of wild populations (Kostow 2009). The increase in the number of captive-bred generations results in a greater degree of deliberate (and unintended) artificial selection, and thus, greater genetic differences between farmed and wild conspecifics are expected. Ultimately, genetic introgression resulting from escaped farm-origin fish may have two possible consequences: (1) the homogenization of genetic differences between populations that might reduce the long-term persistence of the wild populations, or (2) a reduction in fitness, and thus, a reduced productivity of offspring from parents (Bartley & Martinn 2004).

Non-native

The Competitive and Genetic Interactions (CGI) risk of non-native species is based on their potential for imposing negative impacts to wild organisms in the receiving environment resulting from their predation on wild stocks, habitat alteration, competition for feed sources, reproductive hybridization, or disruption of reproductive processes of wild fish. Additional risk occurs when non-native species present traits that favor ecological establishment, such as a tolerance to a broad suite of environmental conditions and rapid growth (Diana 2009), and in these cases, the potential of escaped, non-native species to become ecologically established is high. For example, there is increasing evidence of the negative impacts of farm-origin tilapia (in areas they are not native to) on the biodiversity of the environment into which they escape (Canonico et al. 2005).

It is noted, however, that in some cases non-native species are unable to survive or establish viable populations in the wild. In the case of Atlantic salmon in British Columbia for example, despite numerous escape events (and intentional introduction attempts for fishing), the establishment of breeding populations is uncertain (Bisson 2006, in Thorstand et al. 2008), and monitoring of rivers has not recently yielded reports of Atlantic salmon reproduction (Noakes 2011). Surveys using multiple types of traps in areas with a high probability for Atlantic salmon presence have yielded none of any life stage (DFO, 2013).

Seafood Watch recognizes that in some areas, intentional introduction of non-native species for purposes other than aquaculture has resulted in ecological establishment of non-native populations. In these cases, where viable populations were established in the wild prior to commercial aquaculture production of the species being assessed, or ongoing intentional introductions of conspecifics with identical genotypes are occurring, it is often considered that escapes of non-native species from aquaculture facilities will not have an additional ecological impact. This assumption does *not* apply where commercial aquaculture production has resulted in the ecological establishment of the species being assessed.

Ecological impacts of native and non-native species

Seafood Watch recognizes that in cases where establishment of an escaped non-native species does not occur, or genetics of native farmed species and their wild conspecifics are similar, repeated escapes from farms can still have ongoing impacts to ecosystems in a similar way that establishment of the species would (e.g. ongoing habitat alteration, predation on wild populations, competition for habitat and feed, etc.) (Fleming et al. 2000). Therefore, this factor assesses the frequency and intensity of escape events and their associated impact on wild populations (e.g. a small number of large-scale escape events of a species known to be unable to survive and establish populations in the wild could have less impact than ongoing small-scale escape events of a species known to be highly predatory.) A Critical score in Factor 6.2 results in a Critical score for Criterion 6.

Final scoring of Criterion 6 Escapes

The final score is a combination of the scores for Factor 6.1 and Factor 6.2. A final numerical score of ≤ 1 of 10 results in a Critical score for the criterion, as it represents high escape numbers that are damaging to vulnerable or endangered wild populations.

Assessment scale

The impacts of escapes should be assessed cumulatively.

For assessments concerning polyculture systems, conduct an assessment on the cumulative impact for each species and utilize a weighted average of the scores.

~~—For farm level assessments: apply this criterion to the farm being assessed, or use average or typical data from similar production systems and species if necessary. It is necessary to take into account the farm's contribution to a cumulative level impact, i.e. if the industry in a region consists of a single farm the impact of escapes may be lower than the impact of escapes from a single farm within a larger industry where escapes occur from other farms as well.~~

~~For regional or national assessments: apply to relevant regional, national, or eco-certification statistics or impacts, or use typical or average data for the production system or species. Assess impacts of escapes cumulatively.~~

This criterion combines two factors; Factor 6.1 assesses the risk of escapes from a “typical” farm based on characteristics of the production system used. Factor 6.2 assesses the potential for escaped species to establish and have ongoing impacts to the ecosystem.

Escapes: Factor 6.1 – Escape Risk Score

A measure of the escape risk (for the species being farmed) inherent in the production system, accounting for improvements in production system technology and management techniques when these changes have demonstrably resulted in low or no escapes.

Assessment Guidance

Consider the characteristics of the assessed production system, or the characteristics of a typical, representative or “average” production system in the industry being assessed. Also consider any available data on escapes, and then select the most appropriate score from the following table of examples. Consider all the options in the table below; while every eventuality may not be

covered in the table, use the examples as guidelines to determine the most appropriate Escape Risk score.

When assessing a single farm or a small portion of an industry, the escape score should be the typical score for the industry unless the assessed farms have demonstrably different production practices than the industry norm.

Concern	Escape Risk Examples	Score
Very low	▪ No connection to natural water bodies (i.e., fully biosecure), or; ▪ Tank based recirculation systems ($\geq 80\%$ reuse) with appropriate (multiple) screens, water treatment, and secondary capture devices.	10
Low	▪ Tank based recirculation systems (any % reuse) with (multiple) screens, water treatment, and secondary capture devices (but less robust than those resulting in score of 10), or; ▪ Static ponds with no water discharge (including at harvest) over multiple production cycles; not vulnerable⁵⁰ to flood, storm or tsunami damage, or; ▪ Robust data⁵¹ on fish counting and escape records indicate escapes (catastrophic or trickle) do not occur (e.g. in the last 5 years), or; ▪ Independent monitoring data show that escapees are not present in the wild.	8
Low-moderate	▪ Any “Moderate concern” system (as defined in this table) that also uses multiple or fail-safe escape prevention methods, or active Best Management Practices for design, construction, and management of escape prevention (biosecurity), or; ▪ Any “Low concern” system (as defined in this table) with uncertainty or evidence questioning the robustness of escape prevention measures, or of monitoring data, or; ▪ Ponds with low average annual daily exchange 0–3% not prone to flood damage, or; ▪ Monitoring data indicate only occasional detection of low numbers⁵² of escapees in the wild.	6
Moderate	▪ Ponds with moderate average annual daily exchange (e.g. 3–10%) or that drain externally at harvest, or; ▪ Ponds with a moderate risk⁵³ of vulnerability to flooding events, or;	4

⁵⁰ Not vulnerable – as a guide, not located in areas vulnerable to floods or tsunamis (including increasing risk due to sea level rise or storm severity), e.g., above or beyond 100-year flood event boundaries, or construction is based on 100-year flooding events

⁵¹ Robust data – the escapes score in the Data Criterion is 7.5 or more, or the analyst has confidence that the data are either independently collected or verified, or are otherwise trustworthy.

⁵² ‘Low’ numbers of escapees – insufficient numbers to produce population level impacts to wild species in the receiving environment.

⁵³ Moderate risk – ponds or tanks may be located at the limits or edges of flood or tsunami zones, or constructed to withstand 50 year events

	▪ Flow-through (i.e. single-pass) tanks or raceways, or; ▪ Open systems going beyond⁵⁴ “Best Management” in system design, construction and maintenance, or; ▪ Open systems with documented track record of low escapes (as defined in footnote 41) or failures for at least 10 years, or justifiable evidence⁵⁵ for a lower level of concern, or; ▪ Any “Moderate-high concern” pond system (average annual daily exchange >10%) with multiple or fail-safe escape prevention methods, or; ▪ Monitoring data indicate infrequent detection of large numbers⁵⁶ of escapees present in the wild, or moderately frequent detection of low numbers.	
Moderate-high	▪ Production systems vulnerable to large escape events or frequent trickle losses, or; ▪ Open systems with effective Best Management Practices for design, construction, and management of escape prevention (biosecurity), or; ▪ Any “Moderate concern” system (as defined in this table) with uncertainty or evidence questioning the robustness of escape prevention measures, or; ▪ Large escapes (≥5% of the holding unit) or frequent trickle losses (≥5% cumulatively) have occurred in the last 10 years, or; ▪ Ponds with high average annual daily exchange > 10%, or; ▪ Monitoring data indicate escapees are frequently detected in the wild.	2
High	▪ Open systems (e.g., net pens, cages, ropes) vulnerable to escape, without effective Best Management Practices for design, construction and management of escape prevention (biosecurity), or; ▪ Large escapes or frequent trickle losses have occurred in the last 10 years, and no corrective action has been taken, or corrective actions taken have not been adequate, or; ▪ Ponds in flood-prone areas or vulnerable to flooding events, or; ▪ Production systems that do not safeguard against reproduction (egg/fry/juvenile) escapes, or; ▪ Monitoring data indicate frequent occurrence of large numbers⁵⁷ of escapees in the wild	0

*Note: Intermediate values (i.e., 1,3,5,7 or 9) may be used if needed.

The Escape Risk score can be adjusted to allow for the recapture of escapes where evidence shows that the reduction in escape numbers occurs before they can have an impact, or where

⁵⁴ e.g., exceeding regulatory requirements or the industry’s best management practices in design and construction

⁵⁵ e.g. Adaptations to net pen technology or other equivalent that reduces risk of escape

⁵⁶ Escape numbers capable of producing population level impacts to wild species in the receiving environment

⁵⁷ Escape numbers capable of producing population level impacts to wild species in the receiving environment

the reduction would lead to a reduced risk of impact. For example if evidence shows all escapes are recaptured then the Escape Risk score could be improved to 10 out of 10.

Initial escape risk score = _____ (range 0–10)

Recapture adjustment = _____ (range 0-10)

Final escape risk score (cannot be greater than 10) = _____ (range 0–10)

Escapes: Factor 6.2 Competitive and genetic interactions

A trait-based measure of the likelihood of genetic and/or ecological disturbance from escapees based on their native or non-native status, and/or their domestication and ecological characteristics. Note – even if a species was unable to become established in the wild, repetitive introductions into the wild from escapes can have the same ecological impacts.

Assessment Guide

Consider the species being farmed, its likely survival after escape, and the potential impacts were it to escape. Select the most appropriate score from the following table of examples. Consider all the options in the table: while every eventuality may not be covered, use the examples as guidelines to determine the most appropriate Invasiveness score. Select the lowest relevant score; for example if the farmed species would unable to breed with wild populations if it were to escape (score 10), but could have population level impacts by preying on or competing with wild populations (score 0) then the score for this factor would be zero.

Concern	Characteristics of farmed stock (i.e. the potential escapees)	Score
Very low	- Wild caught or naturally settled from the same water body, or; - Will not compete with, breed with, predate on, disturb, or otherwise impact wild species, habitats or ecosystems⁵⁸, or; - The receiving environment characteristics⁵⁹ mean that escapees will not or cannot cause additional ecological impacts, or; - Post-escape mortality of farmed species has been robustly demonstrated to occur to a degree that satisfies the conditions above for a very low risk of impact.	10
Low	- Native and high genetic similarity to wild conspecifics (e.g. one generation domesticated), or; - Non-native - fully ecologically⁶⁰ established in the production region prior to aquaculture, or;	8

⁵⁸ For example, the species is environmentally benign, reproductively sterile, or physically unable to interact with wild populations (e.g. farm is located in a manmade waterbody with no connection to wild populations)

⁵⁹ For example, identical fish are deliberately stocked into the same environment such that additional farm escapes will not have any additional impact.

⁶⁰ Ecologically established in the environment which means it is capable of actively reproducing in wild areas as opposed to commercially established production in the region

	- Has a low risk of competition, predation, disturbance or other impacts to wild species, habitats or ecosystem, or; - Post-escape mortality of farmed species has been robustly demonstrated to occur to a degree that satisfies the conditions above for a low risk of impact.	
Low-moderate	- Native - some genetic differentiation is likely, e.g. more than one generation domesticated, or; - Non-native - not present in the wild, or present and not established, and highly unlikely⁶¹ to establish viable populations, or; - Non-native - became fully ecologically established in the production region as a result of aquaculture > 10 years ago, or; - Post-escape mortality of farmed species has been robustly demonstrated to occur to a degree that satisfies the conditions above for a low-moderate risk of impact.	6
Moderate	- Native - minor evidence of phenotypic differences⁶² from selective breeding, or hatchery raised for three generations, or; - Non-native - not yet present in the wild (or present in the wild and not yet established⁶³), but establishment is possible, or; - Competition, predation, disturbance or other impacts to wild species, habitats or ecosystem may occur, but are not considered likely to affect the population status of the wild species, or; - Some post-escape mortality of farmed species has been robustly demonstrated to occur, but only to a degree that still presents a moderate concern for impact as defined above.	4
Moderate-high	- Native - genetically distinct from wild conspecifics (e.g. clear evidence of selected characteristics) with evidence or potential for genetic introgression, or; - Non-native - not yet present in the wild (or present in the wild and not yet established⁶⁴), but the same or similar species have already established elsewhere, or; - Non-native - partly established, with the potential to extend the species range (and impact)⁶⁵, or; - Competition, predation, disturbance or other impacts to wild species, habitats or ecosystem occur, and have the potential to affect the population status of impacted wild species, or;	2

⁶¹ As a guide, introductions of the species (multiple and/or over extended timeframes) have been unsuccessful more often than successful or the species reproductive tolerance, behavior or habitat requirements are not suited to the escape location.

⁶² For example, changes in growth rate, disease resistance, body shape, behavior or other changes.

⁶³ Repeated introductions of farm escapees into the wild can have a similar potential for impacts as actual ecological establishment of the species in the wild.

⁶⁴ Repeated introductions of farm escapees into the wild can have a similar potential for impacts as actual ecological establishment of the species in the wild.

⁶⁵ For example, the species is present or partly established in the wild (e.g. in a limited area) and has the potential to cause additional impact as it becomes fully established over a greater range, OR as aquaculture extends its range into new areas.

	Some post-escape mortality of farmed species has been demonstrated to occur, but only to a degree that still presents a moderate-high concern for impact as defined above.	
High	<u>Native - genetically distinct from wild conspecifics (e.g. clear evidence of selected characteristics) with evidence or potential for genetic introgression, and at-risk relevant wild stocks are considered vulnerable or endangered⁶⁶, or;</u> - Evidence of population-level impacts to wild species through genetic interactions, competition, predation or other disturbance, or; - The species has a high potential for impact (e.g. on the invasive species lists⁶⁷, competitive, predatory, habitat modifying etc.) and is farmed in an area where it is not yet established, or an increase in range is possible, or; - No or little evidence of post-escape mortality of farmed species, and a high concern for impact exists as defined above.	0
Critical	Population impacts occur to endangered or protected species.	C

Factor 6.2 score

Competitiveness and genetic interactions (CGI) score = _____ (range 0–10)

Final escape criterion score

Select the final escape score from the table using the 'Risk of escape' (6.1) and the 'CGI' (6.2) scores (e.g., if the CGI score = 7.5, look in the < 8 column).

		Competitive and genetic interactions (Factor 6.2)										
		10	<10	<9	<8	<7	<6	<5	<4	<3	<2	<1
Risk of escape (Factor 6.1)	10	10	10	10	10	10	10	10	10	10	10	10
	9	10	9	8	8	7	6	6	5	4	4	3
	8	10	8	8	7	7	6	6	5	4	4	3
	7	10	8	7	7	6	6	5	5	4	3	2
	6	10	7	7	6	6	5	4	4	3	3	2
	5	10	7	6	6	5	5	4	4	3	2	1
	4	10	6	6	6	5	4	4	3	3	2	1
	3	10	6	5	5	4	3	3	3	2	2	1
	2	10	5	5	4	4	3	3	2	2	1	0
	1	10	5	4	4	3	3	2	2	1	1	0
	0	10	5	4	4	3	2	1	0	0	0	0

⁶⁶ Species listed as protected, vulnerable, threatened, endangered or critically-endangered by the IUCN (Red list) or by a national or other official list with equivalent categories. However, more recent or more regional/stock specific data can override these determinations.

⁶⁷ The Global Invasive Species Database (GISD) <http://www.issg.org/database/welcome/>

Impact, unit of sustainability and principle

- ## Request for Comment

1. Some language has been modified to clarify existing intent
2. Guidance for polyculture assessments that has been inserted into the assessment guide.

Comment:

Background and Rationale

**Note:* Use of the term “disease” refers to pathogens and parasites.

All farming operations risk, and often demonstrate, the amplification of naturally-occurring pathogens and parasites and their associated clinical outbreaks of disease. Depending on the nature of the production system, elevated levels of pathogens and parasites can represent a risk to wild species residing in or passing through the area in which the farms are sited. In many cases, the initial infection of the farm stock will come from wild fish populations, but the amplification of pathogens and/or parasites on the farm and their subsequent retransmission to the same (or other) populations of wild fish can potentially affect the abundance and/or fitness of those wild populations in the surrounding ecosystem. The cross-infection of neighboring aquaculture sites also represents a major production limitation and both aspects require effective biosecurity regulations or management measures.

The impacts of diseases on wild fish are generally poorly understood or underestimated, as it is commonly believed that significant⁶⁸ epizootics rarely occur in wild populations. Furthermore, limited research has been undertaken on diseases of wild populations, as well as on the exchange of pathogens between farmed and wild fish. Therefore, direct evidence for transmission from farmed fish to wild populations is scarce. In some cases, however, evidence suggests that such transmission does take place with the potential for considerable impacts. For instance, it is now clear that wild salmonids (e.g. salmon, sea trout, or char) are infected by sea lice originating from salmon farms, and that other diseases have been spread to wild populations from salmonid farming activities (Ford & Myers 2008, Krkosek et al. 2011).

Because of the limited conclusive research, the Disease Criterion offers two methods of assessment: an Evidence-Based Assessment and a Risk-Based Assessment. The Evidence-Based Assessment can be used only when the Data score for the Disease criterion is 7.5 of 10 or higher. This option assesses known impacts (or demonstrated lack of impact) to ecosystems (i.e. wild populations, wild individuals, etc.). A Critical score is assigned when data show population declines in wild species with populations unable to recover, or when data show that there are population-level impacts to wild species considered endangered, vulnerable, etc. The Risk-Based Assessment is to be used when the Data score for the Disease Criterion is 5 of 10 or lower. This option assesses the operation using evidence of disease/pathogen outbreaks on a “typical” farm, and the openness of the farm system as a proxy for impact to wild populations. A Critical score is assigned when there is a high disease concern and affected wild stocks are considered endangered, vulnerable, etc.

Assessment scale

~~— Farm level assessments — apply this criterion to the farm being assessed, or use data from similar production systems and species if necessary.~~

⁶⁸ Having population level impacts (as opposed to impacting individual animals only).

~~—Regional or national assessments—apply to relevant regional or national statistics or use “typical” or “average” data for the production system or species.~~

Choosing the Evidence-Based or the Risk-Based Assessment

This criterion has two assessment options based on the quality of the effluent data available:

- If good research or data on the impacts are available (i.e. a Criterion 1 – Data score of 7.5 or higher for the Disease category), use the Evidence-Based Assessment table.
- If the assessed operations do not have good Disease and/or impact data (i.e. a Criterion 1 – Data score of 5 or less for the Disease category), or they cannot be easily addressed using the Evidence-Based Assessment, use the Risk-Based Assessment.

Polyculture systems

For assessments concerning polyculture systems, the consider all pathogens, parasites or diseases that affect all species in the system.

Disease: Evidence-Based Assessment

Consider evidence of impacts to wild fish, shellfish or other populations in the farming locality or region.

Concern	Pathogen and Parasite Interaction Risk Examples	Score
No concern	▪ Data show that there is no transmission of parasites or pathogens from the farm to wild species, or; ▪ Data show wild species are not affected by transmitted pathogens or parasites	10
Low	▪ Disease transmission may occur, but data show that pathogens or parasite numbers on wild species are not amplified above background levels, or; ▪ Disease transmission occurs, but pathogens or parasites do not cause <u>physiological impacts/morbidity</u> to wild species	8
Low-moderate	▪ Pathogens or parasites cause <u>physiological impacts/morbidity</u> to wild species but do not result in mortality	6
Moderate	▪ Pathogens or parasites cause morbidity or mortality in wild species but have no population-level impact	4
Moderate-high	▪ Disease transmission occurs, and due to low population size⁶⁹ and/or low productivity (or other measure of vulnerability), and/or high mortality numbers, it negatively impacts the affected species' population size or its ability to recover	2
High/Critical	▪ Data show population declines in wild species with populations unable to recover, or;	0

⁶⁹ The population size is below the point where recruitment or productivity is impaired.

	Data show evidence of population-level impacts to wild species considered vulnerable, endangered, IUCN red list, etc⁷⁰.	
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Disease: Risk-Based Assessment

Consider **ALL** the descriptions or examples below and select the most appropriate score given the available information. While every eventuality may not be covered in the table, use the examples as guidelines to determine the most appropriate score.

Concern	Pathogen and Parasite Interaction Risk Examples	Score
No concern	- The production system is fully biosecure and all discharged water is treated or has no possibility for further impact, or; - The production system has no connection to wild populations	10
Low	- The production system has very limited discharge of water (e.g. farms do not discharge water over multiple production cycles⁷¹), or; - Production practices do not increase the likelihood of pathogen amplification compared to natural populations, e.g., natural stocking density, water quality, feed type, behavior, etc.⁷² - Robust⁷³ fish health and biosecurity management measures⁷⁴ are in place and are properly enforced, preventing the occurrence and spread of disease between farm sites, and from farm sites to wild species.	8
Low-moderate	- Fish health management measures result in low, temporary or infrequent⁷⁵ occurrences of infections or mortalities at the “typical” farm level, or; - The production system only discharges water once per production cycle, or;	6

⁷⁰ Species listed as protected, vulnerable, threatened, endangered or critically-endangered by the IUCN (Red list) or by a national or other official list with equivalent categories. However, more recent or more regional/stock specific data can override these determinations.

⁷¹ Multiple production cycles – as a guide, the normal production practice is to maintain the same water on the farm throughout one complete production cycle and reuse it for the next production cycle without discharge at any time.

⁷² Consider examples of naturally settled shellfish, or extensive fish or shrimp ponds.

⁷³ Robust protocols must include disease monitoring and reporting, disposal of mortalities, emergency disease response, quarantine procedures, active vector or boundary controls, treatment of diseased water, etc.

⁷⁴ Fish health and biosecurity measures designed for applicability at the farm, waterbody and industry scale.

⁷⁵ Low, temporary or infrequent – as a guide, available data show diagnosed clinical disease is present in less than 5% of stock, for less than 5% of the time, or combined diagnosed plus undiagnosed mortalities do not exceed 5% over multiple production cycles.

	- Independently audited, scientifically robust limits⁷⁶ are in place, and available data show that pathogen or parasite levels are consistently below the limits over multiple production cycles, or; - Robust biosecurity protocols are in place that limit the discharge of pathogens at the farm level	
Moderate	- Some disease-related mortalities occur on farms, or on-farm survival is occasionally reduced for unknown reasons, and production systems discharge water on multiple occasions during the production cycle without relevant treatment, or; - The production system has some biosecurity protocols in place, yet is still open to introductions of local pathogens and parasites (e.g., from water, broodstock, eggs, fry, feed, local wildlife, etc.) and is also open to the discharge of pathogens	4
Moderate-high	- Where there is a known pathogen/parasite transfer risk, fish health and biosecurity regulations or management measures do not exist, or are in place but implementation and enforcement is unknown - The farming system is open to the environment, or exchanges water on multiple occasions during the production cycle and suffers from high disease or pathogen related infection and/or mortality - Discharge of water from farms with known disease events occurs, with vulnerable wild hosts	2
High	Wild species are highly susceptible to the pathogens from farms and vulnerable to population-level impacts	0
Critical	There is a high disease concern and the affected wild stocks are considered vulnerable, endangered, IUCN red list, etc.	C

*Note: Intermediate values (i.e., 1, 3, 5, 7, or 9) may be used if needed.

Final disease criterion score = _____ (range 0–10 or Critical)

Criterion 8X – Source of stock – Independence from wild fish stocks

Impact, unit of sustainability and principle

- Impact:** The removal of fish from wild populations for ~~growing to harvest sizes~~supplying stock in farms
- Unit of Sustainability:** Wild fish populations
- Principle:** Using eggs, larvae, or juvenile fish produced from farm-raised broodstocks thereby avoiding the need for wild capture.

⁷⁶ Scientifically robust limits – controls on the number or occurrence of pathogens or parasites are primarily intended to protect wild populations or other ecosystem functions, or to apply a precautionary approach where research is inconclusive.

Request for Comment
While we have not made material changes to the intent or the content of this criterion, we have modified language to clarify the intent. Please provide comment on the proposed language modifications, as viewed as Tracked Changes.
Comment:

A measure of the aquaculture operation's independence from active capture of wild fish for on-growing, ~~or for~~ broodstock or other species raised with the primary stock (e.g. cleaner fish).

Background and Rationale

This Criterion (8X) is defined as an exceptional criterion that may not be relevant to all aquaculture production, yet can be a significant concern for those production practices where it is relevant. Whereas all other criteria or factors score positively and contribute to the overall score total, the exceptional criteria are given a negative score which is subtracted from the final total score for those aquaculture operations where it is a concern.

The Source of Stock criterion is a single factor based on the independence of the farming operation from wild fisheries and their associated impacts, and is assessed using the percentage of production that is sourced from hatchery-raised broodstock (i.e. the percentage of the farm's production that is independent from the direct wild capture of fish ~~for the harvested farm stock~~).

The criterion does not intend to penalize the historic capture of wild fish for the establishment of domesticated broodstocks. It is based on the assumption that the majority of aquaculture operations worldwide are operating as closed life cycles with broodstock no longer originating from wild populations. This is now considered best practice, and therefore should not be given a positive score if it is being upheld. It will, however, be penalized if best practice is not being met. A score of Critical is assigned if there is sourcing of wild juveniles and/or broodstock that are considered endangered.

**Note:* The use of domesticated stocks leads to a good score in this criterion, whereas increasing domestication can be associated with the increased potential for impacts of escapes in Criterion 6 – Escape (native). This is an unavoidable conflict within aquaculture production, and the role of these criteria is to highlight the impacts (and promote better alternatives) associated with whichever production option the farm or industry chooses. It is, however, possible to score well in both Criterion 6 and Criterion 8X if the stock being farmed is sufficiently genetically separate from the wild population that it cannot interbreed, or it is sterile.

**Note:* The collection of wild fingerlings, seed or other life stages for ~~growout in farms supplying aquaculture~~ will often be from depressed species or fisheries. With the exception of sources that would otherwise not survive (for example, ephemeral mussel spat), Seafood Watch considers that capturing wild fish, even from a sustainable fishery, and raising them on a farm is a net loss of resources and ecosystem services. This criterion is based on the reality that wild fish have more comprehensive ecological value than farmed fish, whose scope of benefits is very narrow (i.e. solely for human consumption). It is preferable for wild aquatic resources to continue to be part of a functioning natural ecosystem (while still maintaining a sustainable fishery, where possible) than to remove them and raise them solely in farms.

Assessment scale

- ~~— Farm level assessments — apply this criterion to the farm being assessed, or use data from similar production systems and species if necessary.~~
- ~~— Regional or national assessments — apply to relevant regional or national statistics, or use “typical” or “average” data for the production system or species.~~

Polyculture systems

For assessments concerning polyculture systems (inclusive of the sue of cleanerfish), conduct multiple assessments (one for each species in the system) and utilize the **lowest** score.

Guidance

Source of stock score = the percentage of production that originates from or is dependent on, either:

1. Wild-caught juveniles or seed, unless they are from passive influx or natural settlement (e.g. shellfish)
2. Wild-caught broodstock unless the number used and the sustainability of the source can be demonstrated to be of minimal concern (i.e. score of ≥ -4 in Fishery Sustainability Examples table in Factor 5.1b Source Fishery Sustainability)

2.3. Other wild-caught species (e.g. cleaner fish)

Production from Wild Juveniles or Wild-caught Broodstock (%)	Score
Sourcing of Endangered Species ⁷⁷	Critical
100	-10
90–99.9	-9
80–89.9	-8
70–79.9	-7
60–69.9	-6
50–59.9	-5
40–49.9	-4
30–39.9	-3
20–29.9	-2
10–19.9	-1
0–9.9	0

Final source of stock criterion score = _____ (range 0 to -10, Critical)

Criterion 9X – ~~Predator and w~~Wildlife mortalities

Impact, unit of sustainability and principle

- *Impact:* Mortality of ~~predators or other~~ wildlife caused or contributed to by farming operations
- *Unit of Sustainability:* Wildlife ~~or predator~~ populations
- *Principle:* Preventing population-level impacts to ~~predators or other species of~~ wildlife attracted to farm sites.

Request for Comment

We have modified Criterion 9X to be structured such that Evidence- and Risk-Based Assessment options exist, and the option selected is based on the Data score (a Data score of 7.5 or 10 would allow for the Evidence-Based option, and a Data score of 5 or less would necessitate the Risk-Based option). Please provide comment on:

1. The suitability of this approach and the scenarios at each scoring threshold

⁷⁷ Species listed as protected, vulnerable, threatened, endangered or critically-endangered by the IUCN (Red list) or by a national or other official list with equivalent categories. However, more recent or more regional/stock specific data can override these determinations.

2. In the Risk-Based scoring table, we are seeking suggested definitions for:

- “**significantly**” (in a score of -2, see yellow highlight)
- “**substantially**” (in a score of -4, see yellow highlight)

Comment:

Background and Rationale

This Criterion (9X) is defined as an exceptional criterion that may not be relevant to all aquaculture production, yet it can be a concern for those production practices where it is relevant. Whereas all other criteria or factors score positively and contribute to the overall score total, the exceptional criteria are given a negative score which is subtracted from the final total score for those aquaculture operations where it is a concern.

Aquaculture operations can directly or indirectly cause the death of predators or other wildlife that are attracted by the concentration of cultured aquatic animals. Wild animals such as crustacea, reptiles, birds, fish, and mammals can be predators of the aquatic cultured populations (e.g. Sanchez-Jerez et al. 2008). Predation can have a significant economic impact

on aquaculture operations and also cause injuries and stress to farm fish, and contribute to the spread of parasites and diseases. For that reason, aquaculture operations seek to minimize the impact of predators by using different control methods. These methods can accidentally or deliberately result in mortalities (Engle 2009).

Different control measures are taken by farmers against predators. These methods can be classified into (1) exclusory, (2) frightening, and (3) lethal. Exclusory devices are physical barriers that seek to exclude predators by screens and nets. These can vary from simple, temporary nettings, to the complete enclosure of the entire facility. Methods to frighten predators are typically based on sounds or visual stimuli that discourage predators from remaining at a site by making them believe the site is dangerous or 'unpleasant'. Lethal control methods may include shooting, trapping, or toxic chemicals, and may be legally permitted in some circumstances. Predator control methods can be enhanced through facility design. For example, a raceway can be more easily covered than a pond, and small ponds are more easily protected than large ponds. The design of ponds and raceways with covers or fences can discourage vertebrate predators (Masser 2000).

Although different aquaculture operations attract a variety of predators and wildlife (e.g., starfish and crabs to shellfish aquaculture, birds to ponds, and otters, seals and other marine mammals to sea cages), the impacts of mortalities (from shooting, trapping, entanglement, drowning, etc.) vary depending on the population status, species vulnerability or productivity, and the numbers killed. Substantial numbers of fish may also be trapped as juveniles and grow within the farm until harvest.

This criterion is therefore a measure of the effects of deliberate or accidental mortality on the populations of predators or other wildlife. It is based on the assumption that aquaculture production worldwide has progressed to the degree that operations are not often having population-level impacts on wildlife or predators, and it is considered best practice that management strategies minimize the amount of interaction between wildlife/predators and farmed stocks that results in mortality of wild animals.

The criterion must consider greatly-varying numbers of potential mortalities, and the vastly-differing real and perceived 'values' of the species affected. For example, it must be able to differentiate between the mortality of a thousand rats, or twenty birds, or one endangered marine mammal. Therefore, the score depends on the potential to affect the population status of the relevant species. While the use of non-harmful predator control methods gets the highest score, the evidence of mortality of endangered or protected populations is considered a Critical concern.

The term "Wildlife" refers to any species of wildlife (including predators), other than vermin, residing on, or interacting with, the farm site during production. It does not cover impacts to wildlife during farm construction or expansion due to habitat disturbance.

Select the most appropriate score from the table below. Select the lowest (worst) score that is applicable to the aquaculture operations being assessed. Use time frames relevant to the

impacted wild species. As a guide, use the number of years to reach first maturity (for example, consider average mortalities of Stellar sea lions over the last five years).

Choosing the Evidence-Based or the Risk-Based Assessment

This criterion has two assessment options based on the quality of the data available:

If good research or data on mortality numbers and/or the impacts to the population are available (i.e. a Criterion 1 – Data score of 7.5 or higher for the Wildlife Mortality category), use the Evidence-Based Assessment table. If the assessed operations do not have good wildlife mortality and/or impact data (i.e. a Criterion 1 – Data score of 5 or less for the Wildlife Mortality category), or they cannot be easily addressed using the Evidence-Based Assessment, use the Risk-Based Assessment.

Wildlife Mortalities: Evidence-Based Assessment

While every eventuality may not be covered in the table, use the examples as guidelines to determine the most appropriate score according to what the data or other evidence shows.

<u>Concern</u>	<u>Evidence Examples of Impacts to Wildlife</u>	<u>Score</u>
<u>No concern</u>	▪ <u>Data show there is no direct or accidental mortality of wildlife due to the assessed operations.</u>	<u>-0</u>
<u>Low</u>	▪ <u>Data show wildlife mortalities are limited to exceptional⁷⁸ cases that do not significantly affect the population size.</u>	<u>-2</u>
<u>Low-moderate</u>	▪ <u>Data show wildlife mortalities occur beyond exceptional cases; but represent less than 10 % of the PBR⁷⁹ (or equivalent concept).</u> ▪ <u>Mortality numbers may not be known, but data show potentially affected species' populations are robust and not substantially affected by aquaculture.</u>	<u>-4</u>
<u>Moderate</u>	▪ <u>Data show wildlife mortalities affect the population size; for example, mortalities represent less than 50 % of the PBR⁸⁰ (or equivalent concept).</u>	<u>-6</u>
<u>Moderate-high</u>	▪ <u>Data show wildlife mortalities substantially impact the population size; for example, mortalities exceed 50 % of the PBR (or equivalent concept), but do not exceed PBR.</u> ▪ <u>Data show wildlife mortalities substantially contribute to exceeding PBR; for example, PBR is exceeded and aquaculture mortality represents between 10 and 50% of PBR.</u> ▪ <u>Data show wildlife mortalities exceed regulatory limits.</u>	<u>-8</u>

⁷⁸ Mortalities occur very infrequently, or occur only in exceptional circumstances; for example, when worker safety is immediately threatened, or as a last resort when euthanizing is an act of mercy.

⁷⁹ The Potential Biological Removal (PBR) level is defined as the maximum number of animals, not including in natural mortalities, that may be removed annually from a population while allowing that population to reach or maintain its optimal sustainable population level.

⁸⁰ The Potential Biological Removal (PBR) level is defined as the maximum number of animals, not including in natural mortalities, that may be removed annually from a population while allowing that population to reach or maintain its optimal sustainable population level.

<u>High</u>	▪ <u>Data indicate wildlife mortalities exceed the PBR (or equivalent concept) of the affected population.</u>	<u>-10</u>
<u>Critical</u>	▪ <u>Data show wildlife mortalities exceed, or substantially contribute to exceeding, the PBR (or equivalent concept) of a highly vulnerable species⁸¹.</u>	<u>C</u>

**Note: Intermediate values (i.e., 1,3,5,7 or 9) may be used when justified or needed.*

Wildlife Mortalities: Risk-Based Assessment

<u>Concern</u>	<u>Risk Examples of Impacts to Wildlife</u>	<u>Score</u>
<u>No concern</u>	▪ <u>The production system is isolated from wildlife, or otherwise not vulnerable to wildlife interaction and/or deliberate or accidental mortality.</u> ▪ <u>Effective management practices for the non-harmful exclusion of wildlife are in place, AND deliberate lethal wildlife control is not used or permitted.</u>	<u>-0</u>
<u>Low</u>	▪ <u>Effective regulations or management practices for non-harmful exclusion or control of wildlife are in place, such that mortalities are likely to be limited to exceptional cases.</u> ▪ <u>Deliberate lethal wildlife control is not used or permitted.</u> ▪ <u>The population size or PBR are not known, but mortality numbers are considered highly unlikely to significantly⁸² affect the population size.</u>	<u>-2</u>
<u>Low-moderate</u>	▪ <u>Regulations and management practices for non-harmful exclusion and control are in place but accidental mortalities (e.g. entanglement) cannot be prevented, and mortality numbers are unknown.</u> ▪ <u>Lethal control is only used, or only permitted to be used, in exceptional cases⁸³.</u> ▪ <u>Precautionary regulations or management measures are in place (and enforced) based on minimal impacts to wildlife populations.</u> ▪ <u>The population size or PBR are not known, but mortality numbers are considered highly unlikely to substantially⁸⁴ affect the population size.</u>	<u>-4</u>
<u>Moderate</u>	▪ <u>Exclusion or control methods are unknown, and mortality numbers are unknown.</u> ▪ <u>Regulations or management measures are in place that are based on PBR (or equivalent concept) and mortality numbers are unknown.</u> ▪ <u>Regulations or management measures are in place that aim to limit wildlife mortalities, but enforcement is weak or unknown.</u>	<u>-6</u>

⁸¹ Species listed as protected, vulnerable, threatened, endangered or critically-endangered by the IUCN (Red list) or by a national or other official list with equivalent categories. However, more recent or more regional/stock specific data can override these determinations.

⁸² Seeking public comment on a definition for 'significantly' contributing to impacts

⁸³ Exceptional circumstances; for example, when worker safety is immediately threatened, or as a last resort when euthanizing is an act of mercy.

⁸⁴ Seeking public comment on a footnote definition here for 'substantially' contributing to impacts

<u>Moderate-high</u>	▪ <u>Lethal wildlife control is known to be used or the system is known to be vulnerable to entanglement or other accidental mortality, and mortality numbers are unknown.</u> ▪ <u>Regulations or management measures are not in place or are of unknown content or enforcement.</u> ▪ <u>The population size or PBR are not known, but mortality numbers are considered highly likely to substantially affect the population size.</u>	<u>-8</u>
<u>High</u>	▪ <u>The production system is known to interact with highly vulnerable species⁸⁵ but mortalities numbers (if any) are unknown.</u>	<u>-10</u>
<u>Critical</u>	▪ <u>The production system is known to interact with highly vulnerable species, mortalities are known to occur, but numbers are unknown.</u>	<u>C</u>

Criterion 9X score = - (range 0 to -10)

Assessment scale

- For farm level assessments: apply this factor to the farm being assessed
- For regional or national assessments: apply to relevant regional, national, or eco-certification statistics or impacts, or use data from “typical” or “average” farms.

While every eventuality may not be covered in the table, use the examples as guidelines to determine the most appropriate score.

Concern	Examples of Impacts on Predators or Other Wildlife	Score
No concern	▪ No direct or accidental mortality of predators or wildlife.	-0
Low	▪ Aquaculture operation may attract or interact with predators or other wildlife, but effective management and prevention measures limit mortalities to exceptional cases.	-2
Low-moderate	▪ Wildlife mortalities occur (beyond exceptional cases), but due to high population size ⁸⁶ and/or high productivity ⁸⁷ and/or low mortality numbers ⁸⁸ , they do not significantly impact ⁸⁹ the affected species' population size.	-4
Moderate	▪ Mortalities are known to occur but the species' status or impacts on the population size are unknown	-6
Moderate-high	▪ Wildlife mortalities occur; due to low population size ⁹⁰ and/or low productivity (or other measure of vulnerability), and/or	-8

⁸⁵ Species listed as protected, vulnerable, threatened, endangered or critically-endangered by the IUCN (Red list) or by a national or other official list with equivalent categories. However, more recent or more regional/stock specific data can override these determinations.

⁸⁶ Population is at or near its historic high or virgin biomass, or the population size is above the point where recruitment or productivity is impaired.

⁸⁷ Marine mammals, turtles, sharks, seabirds and other birds are considered to have low productivity.

⁸⁸ Mortality is low compared to natural mortality or mortality from other sources.

⁸⁹ Mortalities are at or below a level that will not reduce population productivity.

⁹⁰ The population size is below the point where recruitment or productivity is impaired.

	high mortality numbers, they negatively impact the affected species' population size or its ability to recover.	
High/ Critical	*-Affected species are protected, endangered, threatened (or other relevant classification) and mortalities contribute to further declines or prohibit recovery.	-10

*Note: Intermediate values (i.e., 1,3,5,7 or 9) may be used when justified or needed.

Criterion 9X score = - _____ (range 0 to -10)

Criterion 10X – Escape-Introduction of secondary species

Impact, unit of sustainability and principle

- *Impact:* Movement of live animals resulting in introduction of unintended species
- *Unit of Sustainability:* Wild native populations
- *Principle:* Avoiding the potential for the accidental introduction of secondary species or pathogens resulting from the shipment of animals.

Request for Comment
While we have not made material changes to the intent or the content of Criterion 10X, we have modified language to clarify the intent. Please provide comment on the proposed language modifications, as viewed as Tracked Changes.
Comment:

A measure of the escape risk (introduction to the wild) of alien species *other than the farmed species* are introduced to an ecologically-distinct waterbody (i.e. one in which they are not native or present). This could include pathogens, parasites, or other secondary species unintentionally transported during live animal shipments-movements (e.g. eggs, juveniles or broodstock, cleaner fish, etc.), or ~~dead animal~~ the movements of other non-biosecure materials (e.g. baitfish or other unprocessed feed ingredients, farming equipment, etc.).

Background and Rationale

This Criterion (10X) is defined as an exceptional criterion and will not be relevant to the majority of aquaculture production, yet it can be a concern for those production practices where it is relevant. Whereas all other criteria and factors score positively and contribute to the overall score total, the exceptional criteria are given a negative score, which is subtracted from the final score for those aquaculture operations where it is a concern.

The movement of animals (live or dead) between ecologically-distinct areas without inspection, quarantine, or other appropriate management procedures has inevitably led to the simultaneous introduction of unintentional accompanying animals during live animal shipments, other than the principal ~~farmed~~-species being transported. The range of potentially transferable species by this way is significant, especially when different life stages (e.g. eggs, larvae or juveniles) are considered.

Criterion 10X addresses the aquaculture operation's dependence on ~~international-or~~ trans-waterbody movements of animals (Factor 10Xa) and the biosecurity of both the source and the destination of the species transported during live fish shipments (Factor 10Xb).

Trans-waterbody movements take place when the source waterbody is ecologically distinct from the destination (farming) waterbody, such that the live animal movements represent a risk of introducing ~~non-native~~-species (pathogens, parasites, other secondary species) not present in the destination waterbody. The scoring table uses the approximate percentage of production reliant on the ongoing ~~international-or~~ trans-waterbody movement within one generation of the farmed product. It does not include historic introductions of broodstock, as our concern is focused on the ongoing dependency on live animal movements or movement of non-biosecure (e.g. unprocessed) materials, such as forage fish used as feed. If aquaculture production does not rely, to any degree, on ~~international-or~~ trans-waterbody movements of ~~live-these~~ animals or materials, it is considered that there is no risk of movement of secondary species and the score for Factor 10Xa is 10 of 10, and Factor 10Xb is not necessary to complete.

The biosecurity assessment (Factor 10Xb) is based on fundamental system biosecurity, Best Management Practices, regulations, and Codes of Conduct – particularly the ICES Code of Practice on the Introductions and Transfers of Marine Organisms (ICES 2004). The biosecurity of the source or origin of ~~live~~-animal shipments determines the risk for ~~non-target~~secondary species entering shipments, and the biosecurity of the destination determines the risk for ~~releasing-introducing~~ them into the wild. The final scoring for Factor 10Xb is the higher of the two biosecurity scores – source or destination.

Polyculture systems

For assessments concerning polyculture systems, conduct multiple assessments (one for each species in the system) and utilize the **lowest** score.

Factor 10Xa – International or trans-waterbody animal shipments

Approximate percentage of production reliant on the ongoing ~~international or~~ trans-waterbody movement of broodstock, eggs, larvae, or juveniles within one generation of the farmed product, or the transport of unprocessed feed ~~or other non-biosecure materials~~.

Note: Trans-waterbody movement is defined with the source waterbody being ecologically distinct from the destination (farming) waterbody, such that the animal movements represent a risk of introducing ~~non-native~~ species ~~not native to or present in the destination waterbody~~. While conducting a complete analysis of the biological diversity of the source and the destination of animal or other material movements is impractical, a reasonable effort to determine the degree of distinctiveness of the ecosystems/environments in question should be made.

Do not include historic introductions of broodstock for establishing domesticated stocks, etc.

Reliance on Animal Movements	% of production	Score
Zero	0	10
Low	0.1–9.9	9
	10–19.9	8
Low-moderate	20–29.9	7
	30–39.9	6
Moderate	40–49.9	5
	50–59.9	4
Moderate-high	60–69.9	3
	70–79.9	2
High	80–89.9	1
	> 90	0

Factor 10Xa score = _____ (range 0–10)

If Factor 10Xa has a score of 10 out of 10 (no ~~international or~~ trans-waterbody movements of animals) do not complete Factor 10Xb.

Factor 10Xb – Biosecurity of source and destination (for introduced species)

Considering the types of species – inclusive of all life stages – potentially being transported unintentionally during ~~international or~~ trans-waterbody movements of the principal farmed species, use the table below **twice** to assess the biosecurity risk; once for the source of animal movements (e.g., hatchery or wild seed bed, etc.) and once for the farm destination. Consider that biosecurity procedures for the principal farmed species may not prevent the ~~escape~~ introduction of smaller, unintentionally-transported pathogens, parasites, plants, animals or their various life stages arriving with live fish shipments. SPF/SPR animals may be free of certain pathogens but are not guaranteed to be free of all pathogens.

The score for Factor 10Xb is the **highest** score (i.e., most biosecure) of either the source or destination. While every eventuality may not be covered in the table, use the examples as guidelines to determine the most appropriate score.

Concern	Biosecurity and Escape Risk Examples for Source and Destination	Score
Very low	No connection to natural water bodies (i.e., fully biosecure)	10
Low	- Tank based recirculation systems ($\geq 80\%$ reuse) with appropriate (multiple) screens, water treatment, and secondary capture devices. - Static ponds with no water discharge (including at harvest) over multiple production cycles, not vulnerable to flood/storm/tsunami damage	8
Low-moderate	- Any “Moderate risk” system with multiple or fail-safe escape or entry prevention methods, or active Best Management Practices for design, construction, and <u>biosecurity</u> management of escape and entry prevention (biosecurity) - Any “Low risk” system with uncertainty or evidence questioning the robustness of entry or escape prevention <u>biosecurity</u> measures - Ponds with low average annual daily exchange 0–3% per day	6
Moderate	- Ponds with moderate average annual daily exchange 3–10% per day - Static ponds that drain externally at harvest or do not screen effluent water - Any ponds or tanks located at the limits or edges of flood or tsunami zones, or constructed to withstand 50 year events - Flow-through tank or raceways	4
Moderate-high	- Any “High risk” system with effective Best Management Practices for design, construction, and <u>biosecurity</u> management of escape or entry prevention (biosecurity) - Any “Moderate risk” system with uncertainty or evidence questioning the robustness of <u>biosecurity</u> escape or entry prevention measures - High exchange ponds with average annual daily $> 10\%$ per day	2
High	- Open systems (e.g., net pens) or wild caught sources (e.g., dredged mussel spat) - Ponds in low-lying valley areas, wetlands, river flood plains, or coastal tsunami zones. - Systems that do not safeguard against reproduction based egg/fry escapes-dispersal - System vulnerable (with evidence) to predator damage	0

Note: Intermediate values (i.e., 1,3,5,7 or 9) may be used if needed.

Biosecurity score of the source of animal movements = _____ (range 0–10)

Biosecurity score of the farm destination of animal movements = _____ (range 0–10)

Criterion 10Xb score = highest biosecurity score = _____ (range 0-10)

Criterion 10X score = $[(10 - 10Xa) \times (10 - 10Xb)] / 10 = -$ _____ (range 0 to -10)

Note: This is a negative score that will be subtracted from the overall final score total of the other criteria.

Exceptional Criterion 10X score = - _____ (range 0 to -10)

Overall score and final recommendation

Numerical score

The Final numerical score = [(Sum of C1–C7 scores) + (C8X + C9X + C10X)]/7
= _____ (range 0–10)

Number of Red Criteria

Any criterion in C1–C7 with a score lower than 3.3, or less than -6.6 for C8X, C9X and C10X, is considered “Red”.

Total number of Red criteria or factors = _____ (0–10)

Number of Critical Scores

A number of criteria or factors have one or more “Critical” characteristics:

- Effluent C2 Evidence-based assessment score = Critical
- Effluent C2 Risk-based assessment score = 0 (high effluent discharge and ~~bad~~poor management)
- Habitat C3.1 score = Critical
- Habitat C3 score = 0
- Chemical use C4 score = Critical (i.e., evidence of pathogens with developed resistance to ~~chemicals~~antimicrobials important to human health) OR; illegal activity with demonstrable negative environmental impacts
- Feed F5.1 ~~FIFO~~FFER value is greater than 4 (actual ~~FIFO~~FFER value, not the ~~FIFO~~FFER score)
- Feed F5.1b Source fishery sustainability score is Critical
- Feed 5.1b is zero and FFER value is >1.0
- Feed 5.1b is 2 out of 10 and FFER value is >2.0
- Feed 5.1b is 4 out of 10 and FFER value is >3.5
- Feed F5.2 PRE score = 0 (i.e., > 90% of the protein provided in the feed is wasted)
- Feed F5.1 ~~FIFO~~FFER value (not score) > 3 and F5.3 PRE score < 2 (i.e., a ~~lot~~high amount of wild fish is used in the feed and most of the fed nutrients are wasted)
- Escapes Factor 6.2 score = Critical
- Escapes C6 score ≤ 1 (i.e., escape numbers are very high and damaging to wild populations) and the affected wild populations are vulnerable, endangered, IUCN listed, etc.
- Disease C7 Evidence-based assessment score = ~~Critical~~0
- Disease C7 Risk-based assessment score = Critical
- Source of Stock 8X = Critical (Sourcing of endangered wild juveniles and/ or broodstock (e.g. IUCN listed, etc.))

- ~~Predator~~/w Wildlife mortalities C9X ~~Predators~~ score of -10 = Critical

Number of Critical scores = _____

Criterion	Score (0-10)	Red? (Y/N)	Critical? (Y/N)
C1 Data			N/A
C2 Effluent			
C3 Habitat			
C4 Chemical use			
C5 Feed			
C6 Escapes			
C7 Disease			
C8X Source of stock	-		
C9X Wildlife	-		
C10X Introductions	-		
Overall score = (0-10)			
Number of Red Criteria =			
Number of Critical Scores =			

Final Seafood Watch Recommendation

The overall recommendation is as follows:

- **Best Choice** = Final score > 6.66 and ≤10, **and** no Red criteria, **and** no Critical scores.
- **Good Alternative** = Final score > 3.33 and ≤6.66, **and/or** one Red criterion, **and** no Critical scores.
- **Avoid** = Final score ≥ 0 ≤ 3.33, **or** more than one Red criterion, **or** one or more Critical scores.

Final Recommendation = _____

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Appendix 1 – Habitat examples

The following additional examples or indicators are provided to help the assessor determine the maintenance or loss of habitat functionality, and/or the level of impact to functioning habitats. Indicators of habitat damage vary between habitat types, are difficult to quantify for some habitats, and may not provide linear measures of damage or scores. Use any relevant indicator of habitat impact for which data or evidence are available.

Wetland ecosystems (mangroves, brackish and freshwater)

Type of Conversion	Remaining Mangrove/ Wetland Area (%)	Other Example or Indicators
Maintains full functionality	100	Undisturbed
Minimal impact	90–100	Little impact on fisheries catch
Minor impacts	70–90	Decrease in fisheries catch Reduced effect on hazard control Loss of juvenile habitat
Moderate impacts	50–70	Changes in species abundance
Major impacts – loss of functionality	0–50	Loss of hazard control capacity Changes in species diversity Significant amount of C release Loss of fisheries Loss of functional diversity

Ocean/ marine ecosystems

Note: benthic marine impacts are typically rapidly reversible, therefore impacts are considered relatively less severe and allocated to different impact groups accordingly.

Type of Conversion	Examples or Indicators				
	(EcoQ) ⁹¹	H'	AMBI	Diversity	Effects
Maintains full functionality	High	$H' > 4$	$AMBI \geq 1.2$	90–100% of reference station value	Undisturbed
Minimal impacts	Good	$3 < H' \leq 4$	$1.2 < AMBI \leq 3.3$	70–90% of reference station value	Slightly disturbed
Minor impacts	Moderate	$2 < H' \leq 3$	$3.3 < AMBI \leq 4.3$	50–70% of reference station value	Moderately disturbed

⁹¹ EcoQ = Biotic biodiversity status

Moderate impacts	Poor	$1 < H' \leq 2$	$4.3 < AMBI \leq 5.5$	30–50% of reference station value	No irreversible impacts on benthic communities (disturbance is rapidly reversed by fallowing) Oxygen depletion Toxic effect of H_2S
Major impact – loss of functionality	Bad	$H' \leq 1$	$AMBI > 5.5$	Less than 30% of reference station value	Some evidence of far-field effects Irreversible impacts

Freshwater ecosystems

Note: benthic freshwater impacts are typically rapidly reversible, therefore impacts are considered less severe and allocated accordingly.

Type of conversion	Index of Biotic Integrity	Effects
Maintains full functionality	>90%	Undisturbed
Minimal impacts	75–90%	Slightly disturbed
Minor impacts	70–75%	Moderately disturbed
Moderate impacts	65–70%	No irreversible impacts (disturbance is rapidly reversed by fallowing)
Major impact – loss of functionality	<65%	Some evidence of far-field effects

Terrestrial ecosystems

Type of Conversion	Land Cover	Salinization	Effects
Maintains full functionality	70–100 %		
Minor impacts	50–70 %		Reduced C sequestration
Moderate impact	30–50%	Higher soil conductivity	Significant habitat fragmentation
Major impact –loss of functionality	0–30%	Reduced crop yields Loss of soil fertility	

Appendix 2 – Additional guidance for the Habitat Criterion

Historic loss of functionality

- If the farms were established historically (~~more than ten years ago prior to 1999~~), the score will (typically, unless otherwise justified) be between 4 and 6, depending on the original habitat value.
- If the farms were established ~~less than ten years ago after 1999~~ in habitats that had previously lost functionality ~~more than ten years ago prior to 1999~~, the score will (typically, unless otherwise justified) be between 4 and 6, depending on the original habitat value.
- If the farms or industry are still expanding into habitats that had previously lost functionality ~~more than ten years ago (prior to 1999)~~, the score will (typically, unless otherwise justified) be between 4 and 6, depending on the original habitat value.

Recent and ongoing habitat damage resulting in loss of functionality

- If the farms have recently been established (~~less than ten years ago after 1999~~) without maintaining critical ecosystem services, the score will be between 1 and 3, depending on the original habitat value.
- If the farms are still expanding into functioning habitat (i.e., there is a continuing loss of ecosystem services), then the score will be between 0 and 3, depending on original habitat value.
- If the farms were recently established (after 1999), or are still expanding into habitat that had previously lost functionality ~~more than ten years ago prior to 1999~~, the score will be between 4 and 6, depending on the original habitat value.

Appendix 3 – Additional guidance for the Feed Criterion

Table A1

If data on protein content of whole harvested farmed fish cannot be found use the table below:

Whole-fish Protein Content examples

Species	Protein %	Reference
Tilapia	14	Boyd 2007
Salmon	18.5	Boyd 2007
Catfish	14.9	Boyd 2007
White shrimp (L. vannamei)	17.8	Boyd 2007
Tiger shrimp (P. monodon)	18.5	Boyd 2007
Rainbow trout	15.6	Boyd 2007
Other	18	

Table A2

Crop, Land Animal, and Alternative Product Protein Content Examples

<u>Protein source</u>	<u>Protein %</u>	<u>Type</u>
<u>Feather meal</u>	<u>84.9</u>	<u>Animal</u>
<u>Meat and bone meal.</u> <u>Defatted 45</u>	<u>42.7</u>	<u>Animal</u>
<u>Poultry byproduct meal</u>	<u>58.7</u>	<u>Animal</u>
<u>Blood meal</u>	<u>79.8</u>	<u>Animal</u>
<u>Maize glutenmeal 60</u>	<u>60.7</u>	<u>Crop</u>

<u>Wheat Distillers grains dehy</u>	<u>28.32</u>	<u>Crop</u>
<u>Maize distillers grains dehy</u>	<u>21.6</u>	<u>Crop</u>
<u>Soybean meal solv extr 48</u>	<u>45.8</u>	<u>Crop</u>
<u>Soybean meal solv extr 44</u>	<u>44.6</u>	<u>Crop</u>
<u>Wheat middlings</u>	<u>16.4</u>	<u>Crop</u>
<u>Wheypowder cattle</u>	<u>13.3</u>	<u>Crop</u>
<u>Hard Wheat bran</u>	<u>15.6</u>	<u>Crop</u>
<u>Maize yellow</u>	<u>9.6</u>	<u>Crop</u>
<u>Insect meal⁹²</u>	<u>40.0</u>	<u>Alternative</u>
<u>Microalgae meal⁹³</u>	<u>55.5</u>	<u>Alternative</u>
<u>Methylobacterium meal⁹⁴</u>	<u>61.6</u>	<u>Alternative</u>
<u>Yeast meal</u>	<u>48.6</u>	<u>Alternative</u>

Table A3

Average Fishmeal, Land Animal and Crop Ingredients Protein Contents

<u>Ingredient</u>	<u>Average Protein content %</u>
<u>Fishmeal</u>	<u>66.5</u>
<u>Land animal ingredients</u>	<u>55.9</u>
<u>Crop ingredients</u>	<u>28.4</u>

Table A4

Global average GWP values for fishmeal, land animal, and crop ingredients

<u>Ingredient</u>	<u>Global average GWP (kg CO₂-eq / kg product)</u>
<u>Fishmeal</u>	
<u>Land animal ingredients</u>	
<u>Crop ingredients</u>	

⁹² Variable; protein content ranges from 35% to 55% and varies by product and manufacturer.⁹³ Variable; protein content ranges from 47.1% to 63.8% and varies by product and manufacturer.⁹⁴ Variable; protein content ranges from 50.9% to 71% and varies by product and manufacturer.