

Freshwater Trout Aquaculture Dialogue

Steering Committee Summary Response to Public Comment on FTAD First Draft

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Overview

This document provides a synthesis of key themes that emerged in 152 pages of public comment that the Freshwater Trout Aquaculture Dialogue (FTAD) received on its draft standards released on July 27, 2010. The document also includes a summary of how the FTAD Steering Committee reacted to the comments and, in some instances, incorporated them into a revised draft. The comments are grouped thematically by Principle area from the FTAD draft standards. To see all public comments received during the public comment period, please see: <http://www.worldwildlife.org/what/globalmarkets/aquaculture/troutdialogue.html>

On any given standard, individual Steering Committee members may have a range of views. The “SC Response” sections in this document represent a common view in the SC, but not necessarily unanimous. As a package, the Steering Committee believes the standards represent an important step forward in defining environmentally and socially responsible production of freshwater trout.

I. General comments

- Many different groups expressed support for the FTAD and its goals.
⇒ *SC Response: The SC appreciates this support.*
- Many comments said the number of third-party reports required by the draft standards would make the standards too expensive and not economically feasible.
⇒ *SC Response: The SC explored other ways to demonstrate a similar level of environmental and social performance and was able to reduce the number of required third-party assessments and reports in the revised draft. In many cases, farms would be able to use information submitted as part of their regulatory process to comply with the standards.*
- Some comments said the draft was too complex, and needed to be streamlined so that producers can easily understand it.
⇒ *SC Response: The SC has attempted to simplify standards where possible.*
- Several comments said they sensed the draft tended to use negative language with respect to trout farming, which may alienate producers.
⇒ *SC Response: The SC has attempted to use neutral language throughout the document, while recognizing that the standards are about minimizing any potential negative environmental and social impacts from trout farming.*
- Some comments said they perceived a Eurocentric bias in the assumptions used about geography, environment, laws, and markets.
⇒ *SC Response: The SC has explicitly sought to write global standards and has sought global input on them. In one instance, the SC used European Union regulation around*

banned chemicals and therapeutants because of the strong capacity and history of EU regulators and the absence of a global list around such substances.

- Several comments said that the FTAD should not attempt to be technology-neutral, and instead develop separate standards for different production methods.
⇒ *SC Response: For standards around effluent, SC revised its approach to make standards that are most relevant for different production systems. The SC has sought to achieve overall equivalent environmental performance from farms certified under the standard, regardless of the production system.*
- Several groups expressed concern about the supply and demand for Aquaculture Stewardship Council (ASC) certified products.
⇒ *SC Response: The SC has attempted to design the standards so that better performers can achieve them without overly burdensome investments or costs. The SC encourages all stakeholders to work with the ASC in its development to build demand and interest in the certification scheme.*

II. Principle 1

- Several comments suggested that 1.1.2 and 1.1.3 (proof of compliance with tax and labor laws) were inappropriate for inclusion in the standard. Others felt that it is unclear why those areas of law were chosen and others were not.
⇒ *SC Response: Principle 1 seeks to ensure certified farms are complying with their national and local laws. Since it is impossible to audit against every potential applicable law, the SC has chosen four areas as proxies for overall compliance. The four areas reflect priority areas for environment and social performance, as well as areas that can be audited. The first area ensures a farm has the required permits to operate. The second area ensures it is making good on its obligations to pay its taxes, a basic social contract. The third area addresses labor laws, which are a major focus of social performance under this standard. The fourth area ensures that a farm is complying with the effluent parameters set by local or national regulators.*
- Several comments said that compliance with the standards in Principle 1 necessarily would mean compliance with much of the rest of the standards, since in many countries governmental environmental regulation is extensive.
⇒ *SC Response: The SC views Principle 1 as a starting place for compliance with the standards. In some jurisdictions, compliance with a farm's regulatory commitments will mean that a farm is already meeting some or many of the FTAD standards. The SC thinks the standards in Principle 2 through 6 provide a good global benchmark for responsible trout farming.*

- Many comments expressed concern that it would be too difficult in some circumstances for trout farmers to find and produce appropriate documentation, and that more specific guidance regarding the documentation requirements is needed.
 ⇒ *SC Response: The SC has provided additional guidance around what kind of documents would show compliance with the standards, and expects to offer further detail in a subsequent Guidance Document. The SC encourages farms to review this guidance prior to the audit, to ensure it can produce the necessary documentation.*

III. Principle 2

- Several comments said the reliance on third party reports in the standards was inappropriate; some felt it would put an onerous burden on trout producers (especially small operations), others felt that it would unfairly force trout producers to obtain duplicate assessments (for ASC certification and for governmental regulators)
 ⇒ *SC Response: The SC sought ways to reduce the burden of third-party assessment in Principle 2. The revised standards permit farms to collect information themselves, work with partners (such as environmental groups), or use information generated in regulatory filings.*
- Several comments expressed concern that existing farms could be penalized if their sites were classified as an environmentally protected area after the establishment of the farms (2.1).
 ⇒ *SC Response: The SC has added an exception to that standard that reads: An exception is also made for farms located in protected areas that are designated as such after the farm already exists in that location. In these situations, the farm must demonstrate that its operation is compatible with the objectives of the newly protected area, and that it is in compliance with any relevant conditions placed on the farm by authorities as a result of the protected designation.*
- A variety of comments objected to numerical standards that they saw as arbitrary or lacking in scientific basis, such as the habitat restoration radii and the percentages of habitat restoration (2.1).
 ⇒ *SC Response: The SC has eliminated those specific aspects of the standards.*
- Several comments said that a habitat restoration timeline should be included in the standards (2.1).
 ⇒ *SC Response: Because of revisions to the standards around wetlands, the need for a timeline is less relevant.*
- Several commentators said they felt there was a flawed assumption present in the standards that trout aquaculture always produced negative impacts on the environment and only negative impacts.

- ⇒ *SC Response: The SC recognizes that trout farming produces a range of positive and negative environmental, social and economic impacts. These standards seek to ensure any negative environmental or social impacts have been minimized or eliminated.*
- Several comments said they thought the definition of "wetland" was unclear, imprecise, or incorrect.
⇒ *SC Response: The SC has adopted a definition used by the U.S. Environmental Protection Agency.*
 - Many comments expressed concerns about the requirements for riparian buffer zones because: they said the standards were unrealistic since farmers may not have control over the relevant buffer zones; altering riparian buffer zones for existing farms would be impractical; there is a lack of scientific research about an appropriate buffer zone width; appropriate buffer zone width will be highly geographically variable; a third party assessment will be too expensive; other ASC standards do not have similar requirements; cage production cannot comply with these requirements.
⇒ *SC Response: The SC has significantly revised the draft standards around riparian buffers to address concerns around practicality, while still seeking to be protective of the unique ecological importance of riparian zones.*
 - Some comments from Canadian stakeholders requested clarification about what trout would be considered "indigenous", and said that rainbow trout should be allowed due to widespread intentional introduction of the species over decades.
⇒ *SC Response: The SC has revised the draft standard around introduction of non-native species to focus on new introductions after publication of the standard.*
 - There was broad support for criterion 2.4, although some felt the need for clearer wording and definitions.
⇒ *SC Response: The SC welcomes specific suggestions to make this section clearer.*
 - Several groups expressed support for criterion 2.5, although one source of disagreement was the requirement of trapping for escape detection, as several comments indicated that trapping is often illegal, impractical, or unnecessary.
⇒ *SC Response: The standard around traps was removed.*
 - Some comments said that it was impractical/impossible to site farms away from any migration routes of predators. (2.6.1)
⇒ *SC Response: The standards about predators now focus on mortality of IUCN red-list species, and use of lethal predatory control.*
 - Industry groups also felt that the prohibition on lethal predator control did not contain enough allowance for exceptional circumstances. (2.6)
⇒ *SC Response: The standard allows for an exception in situations where the farm can provide evidence of an assessment that demonstrates lethal action against a particular*

predator is appropriate, necessary, and presents no risks to wild predator populations or ecosystems. This exception cannot be applied to species that are threatened, endangered or critically endangered.

IV. Principle 3

- Several groups objected to the assimilative capacity assessment (3.2.6) as impractical, onerous, or unnecessary. Some comments cited the vastness of the lakes that support some cage farming.
⇒ *SC Response: The revised standards eliminate the need for assimilative capacity studies, except for cage systems. The SC is still refining the specific requirements for the assimilative capacity study required for lakes, and welcomes comments on how to address situations in which the farm is located in an extremely large fresh water body.*
- A wide variety of submissions said that the standards must give consideration to natural fluctuations in groundwater conditions, as well as the effects of other users of shared water resources (so that trout producers are not penalized for environmental impacts outside their control).
⇒ *SC Response: The revised standards seek to focus primarily on parameters that are within a farmer's control. For instance, the standard around total phosphorus entering the environment from land-based systems is structured so that the farmer can control the outcome through feed use and water treatment systems, regardless of fluctuations in the receiving body of water.*
- Several comments objected to the reliance on third-party reports, which they saw as unnecessary and/or too expensive.
⇒ *SC Response: Those requirements have been eliminated, except for the assimilative capacity study required for cage systems.*
- Criterion 3.2 was very controversial. While there was a range of concerns expressed, some of the most common ones included: comments about the cost, difficulty, geographical-neutrality, or scientific basis for measurements detailed in Appendix II-C; comments regarding the applicability, appropriateness, scientific basis, or details of formulas in Appendix II-B; objections to standards that may duplicate the assessments already required by government regulators; specific suggestions of changes in the details of numerical standards and measurement methodology.
⇒ *SC Response: The FTAD recognizes that different trout-growing jurisdictions employ a variety of regulations around water quality. Some regulations will resemble the revised draft FTAD standards, while other jurisdictions use different approaches. These draft standards represent the FTAD's effort to develop revised standards that will function globally with a range of receiving waters. The FTAD SC welcomes public comments about how to preserve the intent of these standards while minimizing the costs for farms that*

need to demonstrate water quality performance with different metrics and monitoring schemes.

The revised monitoring scheme required under this draft standard seeks to provide farmers with the essential information needed to gauge their impact on receiving waters. The frequency of measurements and proposed methodology reflects an effort to maximize the usefulness of the information, while attempting to reduce the cost of testing. The frequency also reflects the additional testing required in Principle 4 that ensures a healthy aquatic environment for fish inside the farm.

V. Principle 4

- References to consultation/assessments by outside experts drew criticism for reasons including: it is unclear who qualifies as a "fish health expert" and "veterinarian"; frequent visits by veterinarians can be prohibitively expensive, especially for small farms; in many regions, there are no veterinarians specializing in aquatic animal health
⇒ *SC Response: The revised draft clarifies the definition of veterinarian and eliminates the reference to fish health expert. The SC disagrees with the comment that many trout-growing regions have no veterinarians specializing in aquatic animal health.*
- Several comments suggested combining several indicators in criterion 4.1 to streamline the biosecurity standards, and there was broad support for the existence of the biosecurity standards.
⇒ *SC Response: The biosecurity and veterinary health plan standards have been consolidated and streamlined in the revised version.*
- Some stakeholders questioned the document's reliance on EU law in 4.2.1
⇒ *SC Response: The SC used European Union regulation around banned chemicals and therapeutants because of the strong capacity and history of EU regulators. There is no single global list to draw from.*
- Some comments noted that surface-disinfection of eggs is required by law in many areas, and that probiotics are essential to healthy aquaculture, while environmental groups were concerned about the introduction of exotic bacteria.
⇒ *SC Response: The revised draft standards allow for disinfection of eggs. They also allow for probiotics that have been approved by a regulatory process that included a risk assessment.*
- Criterion 4.3 drew a large volume of comments, most focusing on appropriate numerical standards and the relevance of the standards in different circumstances.
⇒ *SC Response: The SC has revised the draft standards around water quality inside the farm to make them a global proxy for conditions that support healthy trout. In addition, the SC has created standards that reflect that variability of water conditions in the real world. The oxygen standard is now a monthly average of daily readings, plus a minimum*

level for any single reading. For toxic nitrogenous compounds, a single reading that is above the standard will lead to daily testing that must demonstrate compliance with the numerical standard each day for 10 days. The levels were set based on a review of relevant research and scientific literature.

- Several groups commented that maximum stocking density (4.3.5) should be determined by the farmer, not a veterinarian.
⇒ *SC Response: The revised draft standards ask that site management and the veterinarian jointly determine the stocking density. The SC believes it is important for the veterinarian to have a voice in that decision.*

VI. Principle 5

- A common concern about Principle 5 was that it would be too difficult for trout farmers to individually certify their feed. While a few groups felt the feed standards themselves were acceptable, many other comments strongly suggested that it would be more efficient to combine many standards in Principle 5 into a separate certification for feed manufacturers.
⇒ *SC Response: The SC has sought to ensure that farmers can reasonably ask their feed suppliers to produce the documentation needed to show compliance with the revised draft standards under Principle 5. The draft standards also include revisions to reduce the cost of compliance while achieving similar environmental performance, such as the alternative of using the “mass-balance” approach for feed manufacturers to show they have purchased the required raw materials. Over time, ASC may chose to develop a different system for certifying feed.*
- A few comments suggested that the FCR standard (5.2.1) was too restrictive. Other comments that the FCR limit was unnecessary or counterproductive, either because it could result in a disincentive to use non-marine feed sources, or because farmers are inherently incentivized to reduce their FCR.
⇒ *SC Response: The revised draft does not include an FCR standard.*
- Comments showed different viewpoints on the feed efficiency standards of 5.2.2 and 5.2.3. While some supported the standards as presented, many suggested alternate formulae, or urged deleting the standards due to the cost of testing or lack of underlying environmental science.
⇒ *SC Response: The revised draft does not include these standards do primarily to concerns around the costs of testing.*
- Several comments noted that capping fish meal/fish oil contributions to trout diet could affect the nutritional values of the final product, and therefore its marketability.
⇒ *SC Response: The SC recognizes that limiting the amount of fish oil in the feed will limit the amount of EPA-DHA content in the farmed fish. The standards seek to ensure*

farmers can produce a nutritious fish, while using limited marine resources sparingly. The continued expansion of the aquaculture industry will require that fish farmers continue the trend of reducing their dependence on raw materials from small pelagic fisheries. The standards encourage the use of trimmings and by products, as well as innovation in obtaining EPA-DHA from sources other than fisheries.

- Some comments said feed standards were too permissive, and needed to be altered to limit impact on forage fisheries.
⇒ *SC Response: The SC believes that the revised draft standards represent a significant improvement over existing practice in feed supplies for trout farming and other aquaculture activity. The suite of standards includes immediate- and medium-term steps to move farms toward responsible sourcing of feed inputs. The standards also support a trend of reducing aquaculture's dependency on small pelagic fisheries.*
- Several groups suggested that consideration be given to using IFFO standards in Principle 5.
⇒ *SC Response: IFFO, or a potential equivalent, is used as one of the standards around immediate sourcing requirements.*
- Commenters had different opinions about the inclusion of transgenic raw materials in feed, ranging from requests to prohibit the inclusion of transgenic ingredients, to requests that the entire standard be removed.
⇒ *SC Response: The SC has written standards that seek to ensure transparency in the use of any transgenic feed ingredients. Transparency is critical for the buyers of the farmed fish and will let retailers easily set any additional screens on the product.*
- Several comments said that the energy use and greenhouse gas monitoring is onerous and unnecessary, with particularly concerns expressed about greenhouse gas monitoring. Others comments said that more information was needed to help trout producers document their energy use. (5.5)
⇒ *SC Response: The revised standards limit the scope of this requirement to energy use on the farm.*

VII. Principle 6

- Several comments requested clarification about whether 6.9.1 referred only to new farms or to existing ones as well, and noted that in many cases this standard is unnecessary because new farm sites must already be certified by the relevant governmental authorities.
⇒ *SC Response: The requirement to conduct a social impact assessment is for new farms. Information developed during the farm's regulatory permitting process can be used to help achieve compliance with this standard.*

- Industry groups were concerned that, especially in developing countries, communication with nearby communities may be difficult, and that clarification is needed about the requirements of standards 6.9.2-3.
⇒ *SC Response: The revised draft provides additional guidance around the kind of communication and consultation with neighboring communities required under these standards.*