

# Freshwater Trout Aquaculture Dialogue

## Steering Committee Summary Response to Public Comment on FTAD Second Draft

January 2012

### Table of Contents

<b><u>OVERVIEW</u></b>	<b><u>1</u></b>
<b><u>GENERAL COMMENTS</u></b>	<b><u>1</u></b>
<b><u>PRINCIPLE 1</u></b>	<b><u>3</u></b>
<b><u>PRINCIPLE 2</u></b>	<b><u>3</u></b>
<b><u>PRINCIPLE 3</u></b>	<b><u>4</u></b>
<b><u>PRINCIPLE 4</u></b>	<b><u>6</u></b>
<b><u>PRINCIPLE 5</u></b>	<b><u>6</u></b>
<b><u>PRINCIPLE 6</u></b>	<b><u>7</u></b>
<b><u>PRINCIPLE 7</u></b>	<b><u>7</u></b>

## Overview

This document provides a synthesis of key themes that emerged in 132 pages of public comment that the Freshwater Trout Aquaculture Dialogue (FTAD) received on its second draft standards released in May 2011. The document also includes a summary of how the FTAD Steering Committee reacted to the comments and, in some instances, incorporated them into the Final Draft Standards. The comments are grouped thematically by Principle area.

This synthesis does not attempt to capture the full range of specific comments that were received and reviewed by the Steering Committee. To see the full text of all public comments received during the public comment period, please visit:  
<http://www.worldwildlife.org/what/globalmarkets/aquaculture/troutdialogue.html>

During the development of Final Draft Standards, Steering Committee members have disagreed, sometimes strongly, on individual standards and the appropriate response to public comments. As a package, the SC believes the Final Draft Standards represent an important step forward in defining environmentally and socially responsible production of freshwater trout, and reflect the diversity of stakeholder voices on these issues.

## General comments

- Several comments urged the FTAD SC to seek alignment with the Salmon Aquaculture Dialogue and other dialogue standards.
  - ⇒ *SC Response: Alignment across dialogues has been a concern of the SC throughout this process. In principle, non-species specific issues addressed in the different dialogues should strive towards alignment. The SC reviewed the approaches of other dialogues, and SC members participated alignment efforts on feed issues (Principle 5), legal requirements (Principle 1) and social standards (Principle 6). Nonetheless, in practice, the SC recognizes that the alignment process won't be immediate, since each Dialogue has been developed by a different steering committee with a different timeline. The Aquaculture Stewardship Council (ASC) will need to make alignment a priority in the near term. In addition, there are reasons for standards to be different across species because of impacts. Many standards may be species specific because of different production systems and the impacts those systems have on the environment and communities. Finally, the dialogues are built around the premise of supporting positive change in an industry by providing incentives to best performers. Industries are structured differently and have more or less capacity to invest in improvements, arguing for a more targeted approach to setting standards for individual species and industries.*

- Several comments said the auditing guidance details and auditing sheets would be very important in determining the actual impact of the standards. Similarly, several comments sought clearer language in the standards.  
⇒ *SC Response: The SC has sought to clarify language in these Final Draft Standards, and will supervise the development of auditing guidance.*
- Many comments said the cost of compliance with the draft standards would be excessively high for producers, causing very few producers to pursue the standard. Similarly, several comments said the standards were too numerous and complex.  
⇒ *SC Response: The SC sought to significantly reduce the cost of compliance with the standards. In particular, the SC dramatically changed the standards around water quality testing to minimize additional or redundant testing to a farm's current government requirements.*
- Several comments sought more emphasis on fish welfare. Other comments said the standards should focus on environmental and social impacts.  
⇒ *SC Response: After significant debate and review of the public comments, the SC has decided not to address farmed fish welfare comprehensively in the standards document, as the SC believes that farmed fish welfare falls outside the core mandate of the FTAD. Instead, the SC strongly encourages ASC to partner with a welfare-specific standard that will better address this issue head on, as requested by stakeholders. The Final Draft Standards removes several on-farm water quality standards whose scientific basis had been questioned by some commenters. To be sure, the Final Draft includes a range of standards that farms will not meet without humane handling, minimization of fish stress, good water quality, good feed and appropriate density.*
- Several comments said the standards should do a better job of accounting for the diversity of production systems and production realities in different locations.  
⇒ *SC Response: The SC has revised the water quality standards to address some of these concerns.*
- Some comments said the standards should restrict or prohibit farming in open net cages.  
⇒ *SC Response: The SC focused on minimizing or eliminating impacts, rather than dictating a production system. The SC is very aware that cage-based production systems release nutrients directly into the surrounding water column, as they have no mechanism for collection or treatment of fish wastes (solid and dissolved) and uneaten feed. The revised set of water quality standards create specific requirements around cage systems, and the need to predict and monitor impact on receiving waters.*

## Principle 1

- Some comments suggested that compliance with local regulations should be sufficient to indicate acceptable performance in much of the remainder of the standards.  
⇒ *SC Response: Compliance with local regulations is a starting place for these standards, which seek to set a global bar for performance.*
- Some comments expressed concerns that the standards would be challenging and onerous to audit.  
⇒ *SC Response: The SC will encourage simple auditing approaches as auditing guidance is developed.*

## Principle 2

- Some comments encouraged the SC to focus more on biodiversity, or require a more detailed biodiversity assessment  
⇒ *SC Response: The standards focus on respecting Protected Areas and the protection of IUCN red-listed species as core proxies for minimizing any potential negative impacts on biodiversity.*
- Several comments expressed concern around the riparian buffer standards, and encouraged a more flexible approach.  
⇒ *SC Response: The standards were streamlined into one requirement that only applies to new farms and has some flexibility built into it.*
- Several comments sought greater clarity about what was meant by “exotic” trout. Some comments suggested the FTAD should eliminate this standard, while other comments sought more strict limits on new introductions of non-native trout.  
⇒ *SC Response: The SC has revised this standard to not permit new introductions of non-native trout, unless the farm uses a closed production system. The SC will provide additional clarity on what is meant by new introductions in auditing guidance. This standard doesn’t affect areas where trout is already farmed.*
- Some comments said the standards around escapes should be streamlined. Several mentioned that the requirement to count fish was excessive and would be stressing on the fish.  
⇒ *SC Response: The SC has streamlined and reduced these standards, and eliminated the minimum number of counts. The SC added a standard that requires a certified farm to make publically available its figures for unexplained loss of fish.*

- Several commentators said the standard requiring no mortality of IUCN red-listed species on the farm would be impossible to verify, as well as unfair.  
⇒ *SC Response: The SC eliminated that standard.*

### Principle 3

- Several comments said the standards around water abstraction appeared to be confusing and challenging to audit.  
⇒ *SC Response: The SC eliminated those standards and replaced them with standards that are clearer and auditable.*
- A large number of comments said that the monitoring requirements were excessively costly, and duplicative of local regulatory requirements.  
⇒ *SC Response: The SC significantly changed the water quality standards to minimize the number of required tests. For land-based farms, the Final Draft Standards do not require a specific effluent-monitoring regime beyond measuring for dissolved oxygen and a benthic analysis once a year. However, the standards do require farms to submit to the ASC the results of the effluent monitoring they conduct as part of their regulatory requirements, in particular any data on any sampling of phosphorus, nitrogen, total suspended solids (TSS) and biological oxygen demand (BOD). This data will help to distinguish the performance of farms certified by this standard over time, and assist in revisions to the standard. For cage-based systems, the Final Draft Standards require monitoring of total phosphorus and dissolved oxygen. The methodology will allow for some flexibility to minimize duplication with current regulatory sampling.*
- Several comments said that the proposed standard around phosphorus discharged per ton of production didn't reflect better practice, and indeed was more lenient than average industry performance.  
⇒ *SC Response: The SC reduced the target to make it more in line with better performers.*
- Some comments disagreed with a statement in the rationale of Criterion 3.2 that stated, "phosphorus is the key limiting nutrient in temperate and cool freshwater systems."  
⇒ *SC Response: The SC recognizes that nitrogen and suspended solids are also important aspects of a farm's effluent. However, in fresh-water production, phosphorus is a good proxy for the effluent's overall impact on the receiving body of water, and indeed is the key limiting factor in many systems. The SC has revised the statement to read, "phosphorus is the key limiting nutrient in most temperate and cool freshwater systems."*

- Several comments said that the proposed oxygen saturation standard was unnecessarily high.  
⇒ *SC Response: The SC reduced the standard.*
- Some comments questioned whether the proposed faunal indicator would be meaningful, and would isolate the impact of the farm.  
⇒ *SC Response: The SC believes that the faunal indicator will be meaningful, and has designed it to isolate the impact of the farm as much as possible. In addition, the SC modified the standard, which now requires that a macroinvertebrate survey downstream from the farm's effluent discharge demonstrate benthic health that is similar or better than a survey upstream from the discharge. The standard uses categories of benthic classification, recognizing the imprecision of benthic analysis. The previous draft would have required "no statistically significant difference" between the downstream and upstream samples. This level of precision wasn't found to be realistic.*
- Some comments suggested that requiring an assimilative capacity study on massive lakes, such as the North American Great Lakes, would be extremely onerous and not particularly meaningful for predicting and understanding a farm's impact.  
⇒ *SC Response: The SC agreed that an assimilative capacity study would not be practical or as relevant for massive lakes. In these situations, the Final Draft Standards require farms to be located at sites that are least sensitive to nutrient discharges because they are exposed to more energetic conditions, have connection to deep offshore waters and don't have hydrodynamically isolated embayments. In addition, farms in these very large lakes have a more rigorous phosphorus standard to adhere to.*
- Some comments encouraged the SC to find a better alternative to the proposed standards around phosphorus concentration in lakes and the morphoedaphic index. Some comments said the FTAD should settle on an existing regulatory model and not develop a new approach.  
⇒ *SC Response: The SC made significant revisions to the water quality standards for cage farms after consulting additional experts and comparing regulations in different jurisdictions, in particular Ontario, Canada and the United Kingdom. The revised standards reflect emerging best practice and a precautionary approach to ensuring a farm is not located in a water body that is experiencing a sharp rise in phosphorus concentrations or a change in its trophic status. The SC notes that details of the proposed approach, in particular the details around calculating phosphorus concentrations and trophic status, still need to be refined during the process of writing auditing guidance.*

## Principle 4

- Several comments wanted more standards related to fish welfare, particularly around transport and slaughtering. At the same time, several comments questioned the scientific basis for several of the on-farm water quality standards set in Criterion 4.3. Other comments raised concerns that the welfare standards might put re-circulating farms at a disadvantage, even though they often have few discharges into the natural environment.  
⇒ *SC Response: As noted above, the SC has decided not to address farmed fish welfare comprehensively in the standards document, as the SC believes that farmed fish welfare falls outside the core mandate of the FTAD. Instead, the SC strongly encourages ASC to partner with a welfare-specific standard that will better address this issue head on, as requested by stakeholders. For this reason, the SC removed the on-farm water quality standards.*
- Several comments sought greater clarity on how “health status” would be defined.  
⇒ *SC Response: In several trout-producing jurisdictions, regulations define health status. The SC will ensure that auditing guidance provides additional detail about how to apply this standard in jurisdictions that don’t have clear definitions.*
- Some stakeholders reiterated concerns about using EU law to define banned chemicals.  
⇒ *SC Response: The SC used European Union regulation around banned chemicals and therapeutants because of the strong capacity and history of EU regulators, making it a good global proxy. There is no single global list to draw from, and the FTAD did not feel it would be appropriate to create a new list itself.*

## Principle 5

- Several comments reiterated concerns that the feed standards would drive up feed costs, that they were out of the scope of a farm-level standard, and that the auditing for these standards would be best accomplished at the feed supplier.  
⇒ *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. Since other standards developed for the ASC will have similar feed standards, it is expected that feed suppliers will develop a package of information that they can easily share with all of their clients seeking ASC certification. To help address the issue of cost, these standards include the alternative of using the “mass-balance” approach for feed manufacturers to show they have purchased the required raw materials. Over time, ASC may choose to develop a different system for certifying feed.*

- Some comments said the standards should do more to reduce the amount of wild caught fishmeal and fish oil in the feed. Other comments said this issue should be removed from the standards, in part because capping fish meal/oil could affect farmed fish quality and nutritional content.
  - ⇒ *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, until alternative sources are developed and made available. 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.*
- 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 require full 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.*
- Some comments sought greater clarity on what an “accredited” waste management company meant, and suggested the standards around waste and recycling would be onerous for farms in remote locations.
  - ⇒ *SC Response: The SC has removed the word accredited to eliminate this confusion. The standards provide some flexibility for farms that have few waste disposal and recycling options.*

## Principle 6

- Several comments said that the third-party social impact assessment envisioned in Standard 6.9.1 was excessive and expensive given the typical extent of trout farming impacts.
  - ⇒ *SC Response: This standard was significantly revised. Instead of requiring a social impact assessment, the standard now requires “evidence of engagement and consultation with surrounding communities about potential social impacts.” The standard only applies to new farms.*

## Principle 7

- Very few comments were received regarding Principle 7