



GAA Response to Comments received for the Seafood Processing Standard, Issue 5.0

The 60-day Public Comment Period for the Seafood Processing Standard occurred on June 2-July 2, 2018

The Global Aquaculture Alliance (GAA) would like to thank the organizations and individuals who took the time to review and submit comments regarding the Seafood Processing Standard, Issue 5.0. GAA values the feedback received and have provided a response to each comment in the following document. Please note that responses are provided to only the public comments submitted by the July 2, 2018 deadline via the BAP website.

Additionally, GAA received multiple comments regarding the name of the standard and the owner. The Seafood Processing Standard is owned and operated by the Global Aquaculture Alliance. The Standard is designed to align and work with the Global Seafood Assurances, a service provider for sustainable seafood.

Comments were received from the following:

1. Cooke Aquaculture/True North Salmon – New Brunswick, Canada
2. International Union of Food and Allied Workers (IUF)
3. Irish National Accreditation Board (INAB) – Dublin, Ireland
4. Murali Krishna Brujji – Independent Auditor
5. Marine Harvest Canada – Vancouver Island, Canada (MHC)
6. New England Aquarium – Massachusetts, United States (NEAQ)
7. Ralph Parkman—Best Management LLC
8. Roger C. Tollefsen – Instructor for Seafood HACCP
9. Seafresh Industry—Bangkok, Thailand
10. Southern Ocean Mariculture—Victoria, Australia (SOM)
11. Thai Frozen Foods Association—Bangkok, Thailand (TFFA)
12. Anonymous stakeholders



Seafood Processing Standard (SPS), Issue 5.0

The clauses of SPS 5.0 has been reordered to better align with the four pillars of responsible seafood (food safety, social responsibility, environmental management, and animal welfare), in addition to traceability. The following responses refer to the newly reordered clause numbers.

Section B - Introduction & Section C - Certification Process

INAB: ISO17065 is incorrectly referred to as a Guide rather than an International Standard and the title is incorrect – see pages 6 and 8

GAA: *Thank you for your comment. This has been corrected in the final version of SPS 5.0.*

INAB: The removal of the defined time periods for Applicant provision of evidence of corrective action and CBO reporting and Certificate issue have been removed from version 4. This could lead to inconsistencies in approach, conditions and standards applied by Certification Bodies. The Scheme owners need to provide details of how such inconsistencies will be avoided.

GAA: *The Certification Bodies Requirement Document is available on the BAP website at the following link: <https://www.bapcertification.org/ProgramIntegrity>*

INAB: It is noted that the stated CBO ownership of the certificate has been removed from the standard. This will need to appear within the CBO and Applicant agreement / terms and conditions of certification.

GAA: *The ownership of SPS 5.0 is clarified on page 6, Section B, in addition to the updated address for GAA.*

Section 1.0: Regulatory Management

1.2.4 Documents are available to prove that the Applicant is aware of, keeps up-to-date, and complies with, all relevant legislation of BOTH the country they operate in, and the countries they export to. This includes all food safety regulations.

Murali Krishna Bujji: This phrase seems ambiguous because companies/facilities may be operating in many countries but producing in one or many countries. Operating could also mean doing some kind of business without actually producing any products. So better to say producing products. Also change the



terminology as it is and might confuse people in ESL countries. Also, would be good to standardize terminology. Change statement “Documents are available to prove that the Applicant is aware of, keeps up-to-date, and complies with, all relevant legislation of BOTH the country they operate in, and the countries they export to” “Documents are available to prove that the Applicant is aware of, keeps up-to-date, and complies with, all relevant legislation of BOTH the country they produce products in, and the countries they export to”. Use facility instead of Applicant within the entire document/standard. The facility should be aware of the agencies that regulate products in the market(s) in which the product(s) are sold. – This being guidance, would not be an auditable clause. It will be good to mention this aspect in the preamble section above. Somehow, I am not a fan of guidance statements within an auditable standard. If the facility is required to be aware of the agencies (let’s say for example USFDA), they have to, and this is not a choice. Because without being aware of the FDA and its requirements how will the facility comply to the regulatory requirements above at 1.2.4. Hence it is better to add this as part of the clause at 1.2.4. Add in the introduction/preamble section that “All additional guidance requirements are should requirements and are not auditable”.

GAA: *Thank you for your comment. BAP agrees that the guidance statements in the Standard may be confusing for BAP auditors. As such, all guidance statements have been either changed to an auditable clause or moved to an auditor guidance document, which will be available for use later this year. BAP also agrees that the term “facility” is more applicable than “applicant” and this change has been made in the final version of the Standard.*

INAB: Legal requirements refer to country of operation and export but could countries of product or material import be relevant here?

GAA: *Clause 1.2.4. has been updated to include import countries.*

2.2.1 The facility shall have an appropriate Quality Manual which incorporates Food Safety that is readily available to all personnel involved in quality management. The Quality Manual shall include controls that address all requirements of the BAP GSA Standard, including the Annexes. Additionally, the facility shall have a copy of the current BAP Best Seafood Processing Practices Standard on site. Copies may be printed or electronic version.

Marine Harvest Canada: Requirement for copy of BAP standard is redundant, already covered in 2.1.3. Remove.

GAA: *Agreed. The following text has been removed from clause 2.2.1, “Additionally, the facility shall have a copy of the current BAP Best Seafood Processing Practices Standard on site,” as it is included elsewhere in the Standard.*



2.2.2 The Quality Manual shall include the products to be processed. The Quality Manual shall also include documented procedures or specific reference to them and describe the interaction of the related processes.

Murali Krishna Bujji: The last sentence/requirement is redundant to the clause 2.1.5.2. Delete the sentence/requirement “and describe the interaction of the related processes”.

GAA: *Agreed. This line is redundant with the other section of the Standard and has been removed from the final version.*

2.3.1 As part of the Quality Manual, the Applicant shall have a clearly defined, documented and Quality Management System Policy statement, authorized by senior management, that reflects its commitment to the entire scope of the BAP standard, including the Annexes.

Murali Krishna Bujji: I propose to include another requirement as almost always the facilities would have separate quality objectives and those would sort of link to the policy but might not be part of the policy. 2.3.2 The applicant shall define, document and ensure food safety and quality objectives are monitored with measurable outcomes.

GAA: *Thank you for your comment. BAP agrees that it is important for the facility to define, document and ensure food safety and quality objectives are monitored with measurable outcomes. This clause has been added to section 2.3 Quality Management System Policy Statement.*

2.4.2 The facility shall also define and document job functions, responsibilities and reporting relationships of at least those employees whose activities affect product quality, legality and food safety.

INAB: Would have expected reference to “competence and understanding” for persons responsible for administrating the standard.

GAA: *Refer to clause 2.4.4 which outlines the competence in specific reference to the HACCP team.*



2.4.6 The operators of processing systems, retorts, aseptic processing and packaging systems and product formulating systems (including systems wherein water activity is used in conjunction with thermal processing) and container closure inspectors shall be under the operating supervision of a person who has attended a school approved by the Commissioner for giving instruction appropriate to the preservation technology involved and who has been identified by that school as having satisfactorily completed the prescribed course of instruction. This person shall supervise only in those areas for which a school approved by the Commissioner identifies the person as having satisfactorily completed training.

Murali Krishna Bujji: Not sure if there would be a Commissioner and whether it is universal. Its better we replace this with “authorities”. Replace “Commissioner” with “Authorities” in both statements.

GAA: *This clause has been revised for clarity in the final version of the SPS 5.0 to the following, “Operators of the processing systems detailed in 2.4.5 (including container closure inspectors) shall be under the supervision of a person who has satisfactorily completed the prescribed course of instruction approved by the US FDA (or equivalent) for giving instruction appropriate to the preservation technology involved.”*

2.9 Outsourcing & Specifications – Processes and Services

Murali Krishna Bujji: It is not a good idea to have auditable requirements (shall requirements) in general information, else it will lose its intent which is for information and not for auditing. Auditors would have difficulty if they find any deviations per general information. They wouldn’t know where to issue the NC. If they issue the NC at 2.9 that means the entire section is not in compliance. 2.9 is an overarching heading to include all 5 clauses beneath it. Also, there is a citation which says “New audit clause 2.9.2” which has some requirements. However, there is another clause after that which has the same clause number 2.9.2 with different requirements. This would cause confusion while auditing. There seems to be too much information under 2.9 and its clauses. It is better to break them up into smaller clauses for effective auditing. Auditors for sure will be thoroughly confused to audit this section.

GAA: *Section 2.9 – Outsourcing & Specifications – Processes and Services has been revised in the final SPS 5.0 to clarify the requirements for both the facility and the auditor.*

2.10 Outsourcing & Specifications – Supplier Approval and Performance Monitoring

Murali Krishna Bujji: It is not a good idea to have auditable requirements (shall requirements) in additional guidance, else it will lose its intent which is for guidance and not for auditing. Auditors would



have difficulty if they find any deviations per against additional guidance. They wouldn't know if they need to issue a NC. There seems to be some redundancy with requirements at 2.9.

GAA: *Section 2.10 – Outsourcing & Specifications – Supplier Approval and Performance Monitoring has been revised in the final SPS 5.0 to clarify the requirements for both the facility and the auditor.*

2.10.2 The facility shall have a supplier approval program which includes a list of approved suppliers and service providers as described in 2.8 and 2.9 above. This list shall be kept up-to-date and reviewed, at a minimum, annually.

INAB: There is no guidance here as to the type or level of supplier approval criteria required.

GAA: *Please refer to 2.10.3 which gives examples of this criteria.*

2.10.4 The facility shall have in place a procedure for regularly monitoring the performance of the suppliers described in 2.8 and 2.9. This monitoring shall be EFFECTIVE and occur annually, at a minimum.

What constitutes “effective”?

GAA: *Auditor guidance and interpretation for each clause will be provided following the release of SPS 5.0. BAP uses this phrase (“effective”) often in the SPS, to mean that a facility must implement processes fully, such that they consistently produce the desired result. E.g. are the systems in place effective? If procedures are not effective, it could point toward problems with one or more of the following: 1) management review/responsibility/commitment training, 2) continuous improvement, 3) lack of enforcement, 4) inadequate corrective and preventive action.*

2.15.2 These activities shall be defined in a documented procedure that is securely stored and readily accessible when needed.

Murali Krishna Bujji: Secure storage is redundant to clause 2.13.2. Rephrase the clause as 2.15.2 The control of non-conformity shall be defined in a documented procedure and readily accessible to designated personnel when needed.

GAA: *Thank you for your comment. GAA has not changes 2.13.2 and 2.15.2 as we believe they are two distinct points for record-keeping.*



2.16.1 The facility shall have a documented procedure that describes how product safety and quality will be maintained in the event of a serious incident such as fire, flood, chemical leaks, extended power outages etc.

Structural integrity and situations of imminent danger to workers should be added

GAA: *Agreed. Structural integrity has been added to clause 2.16.1.*

2.16.2 Serious incidences that occur at the facility as described in 2.16.1 shall be documented. Records of product handling and disposition during and after the incident shall be maintained.

There should be protocols for escalating these issues to BAP and to endorsers by BAP

GAA: *Non-conformities are confirmed by the certification body and confirmed in the audit report.*

2.17.4 The “mock recall” trials shall successfully identify 100% of the product (except for natural wastage e.g. drip and weight tolerances due to the use of tares and equipment accuracy). Corrective action shall be taken for any deficiencies identified in the mock recall or traceability system. These corrective actions shall be documented.

INAB: The standard requires 100% product identification – it is usual to allow for discrepancies due to natural wastage e.g. drip and weight tolerances due to use of tares and equipment accuracy.

GAA: *Thank you for your comment. Clause 2.17.4 has been updated to reflect this feedback.*

3.2.6 The HACCP plan and hazard analysis shall include a list of all allergens present at the facility, including the various species of seafood handled, and each species must be identified by their scientific name. All allergens shall be effectively controlled throughout receipt, storage, handling and use.

Murali Krishna Bujji: As allergens are specific to each country, it is better to be generic rather than just list US, EU and Canada. Add this statement into the clause. The facility shall consider those allergens applicable to the facility in the country of product manufacture as well as those countries where the product is exported to.

GAA: *Clause 3.2.6 has been revised to the following, “The HACCP plan and hazard analysis shall include a list of all allergens present at the facility, including the various species of*



seafood handled, and each species must be identified by their scientific name. All allergens shall be effectively controlled throughout receipt, storage, handling and use.

3.2.7 In addition to the requirements stated in 3.2.6, the facility shall demonstrate that they have adequately labeled the presence of allergens. The HACCP plan must address how the facility will label the presence of allergens in the finished product.

MHC: MHC conducts sampling post-treatment, pre-harvest and post-processing to ensure intent is met, but does not process “at reception”. Provide allowance for testing processed product as long as intent is met. Allergens should not be a required CCP for whole fish processing plants as the only allergen is the product itself. This is accepted by both CFIA and FDA. Remove CCP requirement for whole fish processing plants which do not use ingredients.

INAB: The standard stipulates that allergen labelling must be a CCP. Although this maybe appropriate in many cases it may not be in others i.e. where only wet fish is processed and the allergen risk is already present in the product name. In such cases the definition as a CCP would be in conflict with other parts of the HACCP system as required by clauses 5.2.6 – 5.2.8 which should be based on risk to the consumer. This anomaly requires change or clearer guidance as to where a CCP is not applicable.

GAA: *Agreed. We have removed the requirement for including allergens as a CCP. The new requirement states that the facility must demonstrate that they have adequately labeled the presence of allergens in the finished product.*

3.2.8 Monitoring procedures adequate to control each hazard at each CCP shall be identified in the HACCP plan. These procedures shall include the monitoring frequency, methods, responsible staff, and associated records.

Roger C. Tollefsen: The US FDA only allows the use of a limited number of approved aquatic drugs. End point sampling does not confirm that these drugs were never used. Provide assurances that the hatchery uses only those aquatic drugs approved by the US FDA.

GAA: *Thank you for your comment. The Seafood Processing Standard contains a number of controls that extend beyond endpoint sampling. 3.2.8 addresses the requirement for addressing CCP in hazard analysis and HACCP. This includes ensuring food safety at receiving of raw material. The Seafood Processing Standard is a global standard and takes into account all international regulations of source and export countries including FDA: 1.2.4 Documents are available to prove that the facility is aware of, keeps up-to-date, and complies with, all relevant legislation of both the country they produce seafood in, the countries they export to, and source countries if applicable. This includes all food safety regulations. 3.2.2 The HACCP plan and hazard analysis shall include, at minimum at least those hazards identified by Codex Alimentarius, or the USFDA’s “Fish and Fisheries Products Hazards and Controls Guide” ... “FDA Hazards and Controls Guide” shall become the default position to which all*



facilities shall comply. 3.2.9 Monitoring procedures adequate to control each hazard at each CCP shall be developed and documented in the HACCP plan. These procedures shall include the monitoring frequency, methods, responsible employees, and associated records. This includes incoming raw product. Additionally, BAP Farms and Hatchery Standards have similar requirements allowing only use of drugs that are approved in the source country and country of export. Drugs are only to be used for diagnosed diseases, accompanied by antibiotic sensitivity testing, and appropriate withdrawal times must be observed following treatments. Finally, additional monitoring is required of finished product as indicated in SPS Annex 4.0

3.6.1 The facility shall have a documented food fraud vulnerability assessment procedure (VACCP Vulnerability Assessment Critical Control Points) in place to identify potential vulnerability and prioritize food fraud mitigation measures.

Murali Krishna Bujji: Add the requirement for review of the food fraud plan on an annual basis. Add this under clause “The food fraud plan and risk assessment shall be reviewed, at minimum, annually”.

INAB: There is mention of adulteration but not of food fraud or species substitution here which is a common issue across world trade.

GAA: *GAA agrees that the food fraud plan and risk assessment shall be reviewed annually, at minimum. Clause 3.6.2 in the final SPS 5.0 now states this. Additionally, please refer to the new Food Fraud Section.*

3.7 Food Safety – Food Defense

Murali Krishna Bujji: Add these as auditable clauses instead of guidance. 3.6.2 Staff members responsible for the implementation of the Food Defense Plan shall be clearly identified in the document. They must demonstrate sufficient knowledge in this area to ensure the effective implementation of the food defense plan. The Food Defense Team must ensure that the mitigation strategies are assessed to verify that the Food Defense Plan is being effectively implemented.

GAA: *Guidance within the clauses has been removed and added as auditable clauses.*

3.8.1 The facility shall have in place an effective pest control program/system that prevents and controls risk of pest infestation and harborage areas inside the facility and on facility grounds. Pest control shall be performed by either a licensed third-party or properly trained personnel within the facility. Chemicals used in food facilities shall meet at minimum US EPA standards.



INAB: It is not possible to “eliminate” risk of pest infestation- particularly from outside areas. Requires rewording.

GAA: *Agreed. Clause 3.8.1 has been updated to reflect this change.*

3.8.6 The facility shall have a program for pest trap inspection that includes a map of trap locations, regular cleaning and records of pests caught.

Murali Krishna Bujji: Add this text to a separate clause: Pest control inspections shall be assessed and analyzed for trends on a regular basis, as a minimum annually. The results of the analysis shall be used for improvements in pest control systems.

GAA: *Agreed. The following text has been added to clause 3.8.7, “Pest control inspections shall be assessed and analyzed for trends on a regular basis, at a minimum annually. The results of the analysis shall be used for improvements in pest control systems.”*

3.12.6 All workers in food production and packing areas shall not wear jewelry (including earrings, facial piercings, watches, bracelets, false fingernails, false eyelashes, etc.), and shall not carry items in pockets. Medical bracelets, necklaces or wedding bands may be worn with proper protection to prevent food contamination with management approval. Such jewelry shall be smooth with no stones or recessed areas.

Murali Krishna Bujji: Slight change in the working of the NOTE statement. Delete word “NOTE” and also incorporate the guidance statement into the clause as the auditors wouldn’t know whether to issue a NC or just ignore the guidance statements. Medical/religious bracelets, necklaces and Wedding bands may be worn with proper protection to prevent food contamination with management approval and such jewelry shall be smooth with no stones or recessed areas.

GAA: **Clause 3.12.6 has been revised to the following, “All workers in food production and packing areas shall not wear jewelry (including earrings, facial piercings, watches, bracelets, false fingernails, false eyelashes, etc.), and shall not carry items in pockets. Medical bracelets, necklaces or wedding bands may be worn with proper protection to prevent food contamination with management approval. Such jewelry shall be smooth with no stones or recessed areas.”**



3.12.9 Employees shall keep personal items including any personal medication out of processing, packing and storage areas.

INAB: There is no specific reference to restrictions of personal medication in the workplace

GAA: *Thank you for your comment. Clause 3.12.9 reflect this change.*

3.13.8 Facilities shall have a procedure in place that ensures the safety of air, compressed air, steam, or other gasses used in direct contact with food or as an ingredient in food. The facility shall verify that these items do not pose a risk of contamination to food or food contact surfaces.

Murali Krishna Bujji: Amend the verbiage to denote that monitoring is required and not just a procedure. Change statement to “The facility shall monitor these items to verify that they do not pose a risk of contamination to food or food contact surfaces”.

GAA: *Agreed. The clause text has been updated to ensure these items do not pose a risk of contamination to food or food contact surfaces.*

3.14.1 All chemicals, including cleaners, sanitizers, chlorine, boiler chemicals, etc. shall be approved for use in food plants and used per manufacturer’s instructions at recommended safe dosage levels.

INAB: Establishing the rinse status of chemicals such as sanitizers may be advisable as products can be subject to legal residue limits

GAA: *Clause 3.13.1 covers this comment.*

3.16.1 Procedures shall be in place to ensure raw materials, packaging, cleaners, sanitizers and ingredients are used in the correct inventory rotation order (first in-first out) and within the allocated shelf life (where applicable).

Murali Krishna Bujji: Add FEFO in addition to FIFO. Because sometimes ingredients/additives are used which expire first rather than first in.(first in-first out and/or first expiry first out).....

GAA: *FEFO has been added to clause 3.16.1.*



3.17.8 All products in chilled and/or frozen storage shall be kept in protective sealed cartons. Ready-to-eat and raw products shall be kept separated from one another within the storage area. The facility shall maintain ambient refrigerated and/or freezer temperatures that inhibit bacterial growth, pathogen growth, and/or toxin development.

Ralph Parkman: Requirement for Frozen Storage temperature was inherited from the original BAP Shrimp Process Standard where all Finished Product was Frozen. Two additional words were added to this clause, which now refers to: frozen storage areas “and coolers”. Cooler temperature should be considered equally as important to food safety as freezer temperature. Temperature requirement for fresh chilled (cooler) storage for raw materials and finished products should also be included in this or a complementary audit clause. Per US FDA Seafood Hazards Guide, to address temperature related hazards (pathogenic bacteria, toxin formation, histamines), fresh chilled products should be stored at a temperature of 40° F (4.4° C) or below.

INAB: Even if there is no specific legislation it would seem illogical from a food safety point of view to leave out monitoring and temperature limits for chilled storage where this is used as a vital part of the process but to include them for frozen storage

GAA: *The following text has been added to clause 3.17.8 to clarify the requirement, “The facility shall maintain ambient refrigerated and/or freezer temperatures that inhibit bacterial growth, and/or toxin development. In addition, changes to clause 3.16.8 have been made.*

4.2.4 The internal audit frequency within the facility and its departments shall be determined by risk assessment and shall be carried out annually at a minimum.

Murali Krishna Bujji: Change statement to “The internal audit frequency within the facility and its departments shall be determined by risk assessment and by carried out at a minimum annually”.

GAA: *Agreed. The clause has been revised to the following, “The internal audit frequency within the facility and its departments shall be determined by risk assessment and shall be carried out annually at a minimum.”*

4.3.1 The process monitoring instruments described in 4.3.1 and critical to food safety and legality shall be internally calibrated, or checked for accuracy, correctly, and at an adequate frequency.

Murali Krishna Bujji: Change statement at 6.3.1 to add some issues from 6.3.3. “Process-monitoring instruments critical to food safety and legality shall be calibrated, or tested/checked for accuracy,



internally (i.e. by the facility in house) at an adequate frequency. Such instruments would include thermometers, pH meters, salinity meters, metal detectors, or other items that monitor CCPs”.

GAA: Clause 4.3.1 now states, “Process-monitoring instruments critical to food safety and legality shall be calibrated, or tested for accuracy, internally (i.e. by the facility in house). Such instruments would include thermometers, pH meters, salinity meters, metal detectors, or other items that monitor CCPs.”

4.5.1 The facility shall prepare and implement a system to ensure that all product and ingredient testing and analysis critical to food safety are conducted to ISO 17025 or equivalent (i.e. the “General Requirements for the Competence of Testing and Calibration Laboratories”). This applies to both internal labs and external third-party labs.

INAB: Reference here should be to tests carried out by accredited facilities within their accredited scope- the tests themselves are not conducted to ISO17025. Requires rewording.

GAA: *New wording for clause 4.5.1 Product and ingredient testing and analysis critical to food safety that is carried out by either internal laboratories or external third-party laboratories shall be performed in a manner consistent with the laboratory’s Scope of Accreditation to ISO 17025 or equivalent.*

5.1.1 Facilities shall operate in compliance with this standard and all local, national, and international conventions, rules and regulations, whichever provides the highest protection to the worker. The facility shall have in place policies and procedures pertaining to, but not limited to: worker health and safety and compliance with requirements regarding wages, benefits, hours, hiring practices, minimum age, status of workers, and good employee relations that provide the highest protection to the workers.

What defines “status of workers”?

GAA: *Status of workers refers to their employment status i.e. full-time, part-time, contract, etc.*

5.2.5 The facility shall not have inappropriate access to the worker’s bank account. Payment of wages shall not be made to someone other than the worker or into an account not controlled by the worker.



Should add the following text “The facility shall not have inappropriate access to the worker’s bank account. Payment of wages shall not be made to someone other than the worker or into an account not controlled by the worker.”

GAA: Agreed. The final SPS 5.0 reflects these changes.

5.2.6 The facility shall issue wages directly to workers and not withhold or delay or make irregular payments. All wage payments shall be documented. A record of wage payment (such as a pay slip) shall be provided to the worker and include itemized detail of all benefit afforded and deductions made.

Consider adding language around irregular payments. Consider adding a statement around pay slips.

GAA: Thank you for your feedback. Clause 5.2.6 has been updated to reflect these changes.

5.2.8 The facility shall not use contractors, subcontractors, temporary workers, homeworkers, apprentices or other non-full-time employment schemes to avoid the payment of benefits, social security, etc. required by local law under a regular employment relationship.

If homeworkers are not permitted in any circumstance, consider making that statement at the end of this point. Otherwise, it comes across as if BAP is generally ok with homemaker, just not in this context.

GAA: Thank you for your comment. This has been received and is being discussed internally.

5.3 Working Hours

Consider adding the following: The facility shall not deliberately keep incomplete or falsified working hours records

GAA: Thank you for your comment. GAA believes this is covered under clause 5.3.5.

5.3.3 The facility shall not terminate an employee’s contract for refusal to work overtime or deploy any other detriment for noncompliance.

Keep in mind that mandatory overtime and penalty for noncompliance is permitted in the US. Consider adding language.



GAA: *Clause 5.3.3 has been updated to the following, “The facility shall not terminate an employee’s contract for refusal to work overtime or deploy any other detriment for noncompliance.”*

5.4.3 Bonded labor is prohibited. The facility shall not require the payment of deposits, bonds or other financial or collateral guarantees that may result in debt bondage. This includes recruitment fees, fines, and deductions from wages, and withholding of pay that are not part of a legal contractual agreement with the employee.

Consider benchmarking the RBA Definition of Fees and consider amending the highlighted portion of this point in particular. <http://www.responsiblebusiness.org/media/docs/DefinitionofFees.pdf>

GAA: *Thank you for comment and for the reference link.*

5.4.4 Workers shall have the right to leave the premises after their work shift. Workers shall also have the right to terminate their employment after reasonable notice. Facility shall not otherwise unreasonably restrict workers’ freedom of movement.

Add language reasonable notice. Facility shall not otherwise unreasonably restrict workers’ freedom of movement.

GAA: *Agreed. Changes to the text are reflected in SPS 5.0.*

5.6.4 Employer Pays Principle. The employer shall bear the full costs of recruitment and placement of migrant workers. Migrant workers shall not charge any fees for recruitment or placement.

Seafresh: The Thai legislation requires that employers cover some recruitment agency fees and expenses, but not all recruitment costs. The adoption of a full Employer Pays Principle by which employers bear the full costs of recruitment and placement of migrant workers would require some adaptation of Thai companies and recruitment agencies to manage and control the associated financial risks. The Seafood Task Force will be working on the implementation of the Employer Pays Principle over the next few years. That will include some costs that workers would be expected to cover, and therefore what is understood as “full costs of recruitment and placement” would need to be detailed. We suggest to consider an immediate requirement of the Global Seafood Assurances (GSA) Seafood Processing Standard based on compliance with legislation as stated in the Seafood Task Force Code of Conduct: “Workers shall not be required to pay recruitment and hiring-related fees to employers, agents or labor broker outside legally allowed fees”. We also suggest that the expectation that the employer bears the full costs of recruitment and placement of migrant workers is announced for the next review of



the Global Seafood Assurances (GSA) Seafood Processing Standard so that certified companies initiate a transition plan, which in the case of Thai companies will be aligned with the Seafood Task Force guidance and timeframe.

TFFA: The Thai Frozen Foods Association (TFFA) writes this letter to express our concern about the updated social responsibility requirements of the GSA Seafood Processing Plant standard. Thai seafood processors and the TFFA work tirelessly to facilitate a sustainable seafood supply chain for the international market. Our membership have been long time participants in Best Aquaculture Practices (BAP) program, and have grown large footprints that span processors, farms, feed mills and hatcheries. We, the TFFA and seafood processors of Thailand, have seen firsthand the improvements in sustainability and social welfare the Best Aquaculture Practices (BAP) program has facilitated. We recognize the international demand for improved social responsibility however we fear that many do not recognize the unique challenges faced by our country. Following our review of the draft Seafood Processing Plant Standard, we have concerns about Annex 2: Social Responsibility Management Requirements. The labor chains of Thailand are different from other countries in South East Asia. Under section A2 3.0 Workers Fundamental Rights – we believe there is a threat of Thailand as a whole being unable to comply with the standard as it stands.

Clause A2 7.4 currently states:

Employer Pays Principle. The employer shall bear the full costs of recruitment and placement of migrant workers. Migrant workers shall not be charged any fees for recruitment or placement.

Thailand's labor chain is the most complicated of any country in South East Asia. With an unemployment rate around 1%, much of our factory economy is dependent on migrant labor. Workers from Myanmar, Cambodia and Laos are often recruited by government approved agencies in their home country to come to Thailand to work. Thailand's high minimum wage and many opportunities in the food processing, garment and domestic service sectors enable workers access to many types of jobs and the ability to remit money back home.

GAA: *Thank you for submitting a public comment regarding the Employer Pays Principle. We agree that GAA needs to provide adequate time for facilities to adjust to the new requirement and that there is still debate among social accountability experts regarding how to eliminate debt bondage from excessive/illegal recruitment fees. As written, the Seafood Processing Plant Standard does not permit illegal recruitment fees. The final SPS 5.0 has revised this text to extend the timeline to comply with the employer pays principle to 2020. However, facilities are now required to document the agencies used to recruit, hire, and/or employ workers, in addition to any known fees paid by or debts accrued by workers.*



IUF: Freedom of Association and Collective Bargaining is the key in the labor relations system. When workers are organized in independent trade union and have opportunity to bargain collectively vis-à-vis employer, that mean there is a system in place which will effectively prevent abusive labor practices and function to create safe and decent workplaces. It therefore should be prioritized over other requirements of the Socially Responsible Management Requirement. Add criteria for measurement of the management behavior: Do the workers have the right to join union? In fact, how many of them are in the union? How the union function, who decides on the union leadership and priorities? Is there a collective bargaining agreement at the facility? What is the scope of it? Does it include wages/pay level, OHS provisions, working time? How it is developed and signed? Who has signed it and when? What are the main issues currently under negotiations?

GAA: *Thank you for your comment and feedback. Section 5.8 in the SPS 5.0 pertains to freedom of association and collective bargaining.*

6.1.2 If provided, employee housing shall meet local and national standards (e.g., safe, water-tight structures, adequate space, heating/ventilation/cooling, pest control, sink, shower and toilet facilities).

Add the following text: If provided or mandated by the facility or employment agency/labor broker, employee housing shall meet local and national laws and standards (e.g., safe, water-tight structures, adequate space, heating/ventilation/cooling, pest control, sink, shower and toilet facilities).

GAA: *Thank you for your comment. Clause 6.1.2 has been revised to include the following, "If provided or mandated by the facility or employment agency/labor broker, employee housing shall meet local and national laws and standards (e.g., safe, water-tight structures, adequate space, heating/ventilation/cooling, pest control, sink, shower and toilet facilities)."*

6.1.4 The facility shall provide a safe and hygienic place for workers to change into appropriate work attire and to store personal belongings.

The facility shall provide a safe and hygienic place for workers to change into appropriate work attire and to store personal belongings that is secure and accessible to workers without delay or payment to access.

GAA: *The proposed text has been added to clause 6.1.4.*

6.2.6 Emergency evacuation drills (in case of fire, chemical leak or similar) shall be conducted, at a minimum, annually, to include all shifts and floors, and conducted jointly with other occupants in the building. Drills should be conducted similarly in housing facilities. The frequency of fire and evacuation drills shall be documented and verified.



Consider adding the following text, “drills (in case of fire, chemical leak or similar) shall be conducted, at a minimum, annually, to include all shifts and floors, and conducted jointing with other occupants in the building. Drills should be conducted similarly in housing facilities.”

GAA: *Thank you for your comment. We agree, and this text has been added to clause 6.2.6.*

6.2.8 Select workers shall be trained in the details of the emergency response plans and in first aid (to include electrical shock, profuse bleeding, drowning and other possible medical emergencies). A list of the trained workers shall be kept.

Suggest adding a requirement on training workers on electrical safety beyond just electrical shock.

GAA: *Thank you for your comment. Further guidance on training workers will be available in the upcoming auditor guidance document.*

6.3.2 The facility shall list and control the issue of protective equipment and clothing provided to employees (such as smocks, eye protection, gloves, insulated wear for refrigerated areas, boots for wet areas, etc.)

Roger C. Tollefsen: This section correctly notes that the hazards shown in the FDA Hazards Guide must be addressed. But they “depend upon the where the product will be exported.” The US FDA is more restrictive in the use of aquatic drugs. How can an importer know that a GSA certification was given for seafood products that would be exported to the US? It does not say this on the certificate and cannot be used in support of the FDA’s 21 CFR 123.12. Clearly identify on the GSA certification the seafood products covered and that these may be exported to the United States. I propose to add “ensure the proper use of” to the clause. The facility shall list, control the issue of and ensure the proper use of protective equipment and clothing provided to employees (such as smocks, eye protection, gloves, insulated wear for refrigerated areas, boots for wet areas, etc.).

GAA: *The proposed text has been added to clause 6.3.2.*

6.5.3 The facility shall maintain a training program that orients new employees in general health, safety, product quality and the prevention of product contamination. The applicant shall also provide refresher training to all employees on these subjects at least annually.

Add additional language to reference training related to fire safety, electrical safety, and disposal of dangerous materials



GAA: *Section 6.5 Employee Training has been revised to include all clauses relating to training at the processing facility.*

7.1.6 Fuel, oil and lubricant storage shall include secondary containment areas to contain possible spills. The containment shall be equal to or greater than 110% of the capacity of the containers.

MHC: Additional guidance is still unclear. Is the intent that 110% of the total volume of all containers is required? Further clarification.

GAA: *Additional guidance for clause 7.1.6 has been removed for clarity.*

7.2.2 Solid waste, waste water in plant production areas and on the plant grounds shall be properly stored and frequently removed. (This includes processing by-products such as heads, shells, bones, viscera, etc., and used packing materials). Such waste shall be disposed of to avoid negative impacts on the community and according to national environmental standards.

Murali Krishna Bujji: Additional Guidance cites that the issues cited are required by regulatory agencies. Hence, they cannot be guidance and become auditable requirements and auditors wouldn't know whether to issue a NC or just ignore the guidance statements. Add into the clause 7.2.2. Waste water (grey water) from retort and processing shall be disposed of in accordance with US Federal Government (EPA) regulations. (Storm water is also included in grey water scope under EPA but may not be applicable in other countries.)

GAA: *Additional guidance has been incorporated into the clause text.*

Section 8 – Animal Welfare

NEAQ: Please expand this section to include wild-caught species that are harvested live and then processed at the plant (e.g. lobsters, crabs).

GAA: *Section 8 – Animal Welfare will only include farm-raised species at this time.*

8.1.1 Animals shall be transported to processing plants or other markets in a manner that assures a high level of animal welfare and minimizes distress.



Seafresh: 8.1.1 and 8.1.2. both deal with the transportation of live animals and for clarity they could be merged. Live animals transported either to processing plant or other markets must be in a manner that assures a high level of animal welfare and minimizes distress. Transport must be implemented without undue delay, and the time and stocking density controlled to provide optimum survival and product quality. These shall include, where necessary, adequate clean water, dissolved oxygen levels and temperature control.

NEAQ

Some species are transported to processing plants in live holding systems. In addition to welfare requirements, the processing plant should be required to prevent escapes and the spread of aquatic animal pathogens during transport to its facility.

GAA: *Thank you for your comments on clause 8.1.1 and 8.1.2. Your feedback is valued and we are considering your points internally.*

8.1.3 Adequate dissolved oxygen levels shall be maintained. Transport density shall be determined by local conditions, these transport provisions shall apply equally to all suppliers, plant staff and subcontractors.

Seafresh: 8.1.3 further explains 8.1.2. 8.1.3 may be used as a footnote with more explanatory guidance. we would suggest adding methodologies that can be used to verify compliance of 8.1.2.

GAA: *Thank you for your comment. We have noted your feedback on adding methodologies.*

8.3.1 If animals are slaughtered at the processing facility, before slaughter, they shall be quickly rendered unconscious by humane means.

Cooke Aquaculture: Clause does not consider animals slaughtered on site/harvesting vessel. Change wording to not be specific to slaughter at the processing facility – suggest “when animals are slaughtered, they shall be quickly rendered unconscious by humane means prior to slaughter.”

GAA: *Section 8- Animal Welfare will only pertain to farm-raised species at this time.*

9.1 Product Identity Preservation

NEAQ: It is not clear why certain certifications are called out and others are not (e.g., Aquaculture Stewardship Council or Responsible Fishing Standards (RFM)). Will only the stated schemes require segregation? We suggest GSA develop a list of reference certifications for processing plants and auditors, and ensure appropriate segregation is applied. Will this standard overlap or be duplicative with the ASC/MSC Chain of Custody certification (also relevant for 7.3 Traceability Elements) and is



harmonization possible? Processing plants that only process wild-caught products should also be required to segregate certified from non-certified sources (as written, it only seems to apply to plants that process both farmed and wild). Plants should be required to identify and segregate byproducts from certified sources if they are intended for aquaculture feed or other uses, in order to maintain their certified status. This could help develop a source of “responsible” byproduct ingredients in the future, which could then meet responsible raw material sourcing requirements in feed mill certifications.

GAA: *Agreed. References to other certification programs have been removed from the standard.*

9.3 Traceability Elements

NEAQ: We believe the list of information for wild-caught species is insufficient and does little to improve the transparency of seafood products through the supply chain (or be consistent with the Seafood Import Monitoring Program (SIMP)). We recommend that the following change “The facility shall have a system in place that ensures up-to-date, and easily accessible, data of all of wild-caught raw material suppliers that are supplying them since the last BAP audit. This information shall also include the quantity supplied by each supplier. The information shall include:

- Supplier name and address including country (to meet GFSI v7.1)
- Species of fish, both Latin and common or commercial name
- Product form at the time of landing including quantity and weight
- Date harvested
- FAO statistical area of harvest
- Country of first landing
- Date landed
- Name of entity to which the fish was first landed or delivered including: name, telephone, and email address of contact person
- Name of the flag of the harvesting vessel
- Vessel permit or license number
- Unique vessel identifier (such as vessel name or registration number)
- Specific type of fishing gear used for harvesting
- Date of deliveries and lot numbers
- Input tonnage and total net weight produced for mass balance calculation
- Evidence of chain of custody from harvest to export to USA, where applicable”

In addition, farmed information should also capture the production system used.

GAA: *Agreed. It is GAA’s intention to create a Seafood Processing Plant standard that is compliant with NOAA’s Seafood Import Monitoring Program (SIMP). We have added the components of SIMP to this requirement.*



9.3.2 Ingredients/Packaging materials – Facilities shall maintain complete data for all materials used in the product (including packaging, ingredients, chemical additives) from approved suppliers to include the below information, as applicable:

MHC: Based on the wording of, it seems that the requirement here is for overall product inventory. If the intent is to provide traceability on a daily basis, this needs to be clarified. Further clarification.

GAA: *Thank you for your comment. Clause 9.3.2 has been revised for clarity.*

9.7 Mass Balance

MHC: Final values (December 2018) seem unrealistic for most salmon processing plants. Our estimates would require ~\$1M additional chemical cost annually to bring BOD in line, after installing a top of the line treatment plant at our Port Hardy Processing facility.

Cooke Aquaculture: Mass balance should not be separate for farmed and wild species; the same parameters should be required of both. It should not matter the star status/per species, etc. as the mass balance should be able to be completed for any lot. Provide single list of mass balance requirements.

GAA: *Thank you for your valuable feedback regarding mass balance.*

A2 2.3 To minimize the chance of disease transmission from effluents discharged to natural waters, plants shall screen out solids and treat effluents by chlorination or another method of disinfection which will kill the disease organisms before release. (Once the effluents are properly treated, disinfectant residues shall be neutralized, removed, or allowed to dissipate prior to effluent discharge).

NEAQ: To further minimize the role of processing plants in the spread of aquatic animal pathogens, we recommend GSA certified plants are also required undertake a risk assessment of the species they process to assess the risk and potential mechanisms to spread aquatic animal pathogens (such as in effluents, disposal of processing wastes (in standard 4.2.2), and byproducts destined for aquafeeds or other potential uses. Controls to prevent the spread of disease (in addition to treating effluents) should be based on the risk assessment. GSA plants should monitor the disease status of the source of products for processing, and potentially be required to prohibit the acceptance of products in the event of significant disease outbreaks on farms, particularly novel diseases in foreign countries. Some processing plants employ holding facilities that are open to the local environment, such as holding cages, which



may not be covered by BAP farm standards. Plants which do this should be required to employ suitable measures to prevent escapes and the spread of aquatic animal pathogens, referencing relevant BAP farm standards for suitable controls.

GAA: *Thank you for your feedback on disease transmission. We value your comment and have noted this as area for continuous improvement.*

Annex 4 Sampling and Testing Verification Requirement

MHC: Detail of sampling requirements is very confusing, and does not match the description in the glossary (one fish from three lots). For plants producing one lot per day with no active inventory (all product shipped out daily), 12 lots is difficult to achieve. Further, this is a huge increase over the current 3 fish requirement, and will result in significant expense. If increased sampling is required, use a risk-based framework in order to not penalize well-performing processors. Request that facilities be provided sampling results at least at the same time as BAP/auditors, rather than receiving any test result second hand via BAP. Adjust wording to state remove “BAP will be responsible to disseminate test results to both the CB’s and to the Applicant”, all parties to receive same results at the same time. Annex 4 Table II Possible error with tetracycline limit- previously no residue allowed, now level much higher than comparable treatments. Ensure proper value included.

GAA: *Annex 4 has been revised substantially from the draft released for public comment to provide additional clarity on this topic.*

INAB: Although section 6.4 states “This sampling plan shall also incorporate any testing beyond BAP that are required by the local or country of export buyers or regulatory authorities” Annex 4 indicates by reference that all requirements for testing fishery products in Commission Regulation (EC) No 2073/2005 on microbiological criteria for foodstuffs are included where they are not. This should be clarified alongside Annex 4 or the missing requirements included e.g. testing of cooked molluscs for E.coli and S. aureus, histamine testing where relevant etc.

GAA: *Annex 4 has been revised to reflect this comment.*

Cooke Aquaculture: Annex 4: in previous standard (issue 4.2), supplementary guidance SPS 2016-02R stated that drug testing only needs to be conducted on single composite of raw primary product form and not each product form, however, section 1 of this annex does not include such an exemption and states that drug testing be conducted from each product form. As a fresh processor, we do not have 12 lots available on the processing plants at time of audit. The minimum would be 1, the maximum would be 5. All lots are of the same volume and same risk (depending on the definition of risk in this description). It would not make sense to resample the same lot 12 times or the same 5 lots +2 times to achieve 12 samples. Should be changed to state that those facilities that do not have 12 lots, sample from all lots available on the day of audit.



GAA: *Under SPS 5.0, the number of samples to be collected will vary depending upon each processing plant's annual production (actual, not "capacity"). Separate detailed written instructions covering this will be issued to supplement what is shown in SPS 5.0 Annex 4. A minimum of 4 samples per species, up to a maximum of 12 samples per species for the highest-tonnage plants, will be collected. A maximum of 2 drug residue tests will be performed on composites of 4 samples each. In plants producing fresh (raw unfrozen) products, in case there are not 12 separate production lots available, additional samples will be collected from higher-risk or higher-volume production lots to reach the required number of samples.*

A4 2.2 The auditor shall confirm whether the tests carried out by the Third-party Laboratory were complete, that the correct parameters were tested, using testing methods acceptable to BAP, and using the correct levels of sensitivity (LOQ's, MRPL's), as specified in Annex 4 Table II.

MHC: MHC policy is to sample for any product that has been used during the course of production. We do not sample for products which are not used (e.g. if fish are treated with oxytet, residue samples are performed). If fish have not been exposed to the drug, there is no need to test. The risk for these fish would be the same as wild fish, which are exempt. Remove requirement to test for Table II treatments which have not been used on the fish.

GAA: *Thank you for your feedback regarding Annex 4. We value your comment and will continue to discuss this point internally.*

Annex 5 Water Quality Testing Requirements

Cooke Aquaculture: Aluminum and manganese, according to the EU Drinking Water Directive <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31998L0083&from=EN>, do not have a MCL (Maximum Contaminant Level), as they are listed as indicator parameters – the only two of the annex that are so. Instead of a MCL, they have a Parametric value. According to the Directive, if an indicator parameter is out of compliance, the member-state must determine if the non-compliance poses any risk. The current list in the annex indicates that over these limits, the water is unsafe to consume which is not true for these two parameters. According to the 2017 Guidelines for Canadian Drinking Water https://www.canada.ca/content/dam/hc-sc/migration/hc-sc/ewh-semt/alt_formats/pdf/pubs/water-eau/sum_guide-res_recom/sum_guide-res_recom-eng.pdf, 0.05mg/L is an AO (Aesthetic Objective) for manganese, similarly, the 2018 Edition of the Drinking Water Standards published by the US EPA <https://www.epa.gov/sites/production/files/2018-03/documents/dwtable2018.pdf>, lists manganese under SDWR (Secondary Drinking Water Regulations) and also uses the 0.05mg/L as a non-enforceable Federal guideline, regarding cosmetic or aesthetic



effects of drinking water. The Maine CDC Maximum Expose Guidelines (MEGs) for Drinking Water <https://www.maine.gov/dhhs/mecdc/environmental-health/eohp/wells/documents/megtable2016.pdf>, states that the MEG for Aluminum is 7000ppb (7.0mg/L) and for manganese, 300ppb (0.3mg/L) which is much higher than the 0.2mg/L and 0.05mg/L respectively in the annex. The MCL for these two parameters should be removed and an AO/SDWR/Indicator Parameter requirement be applied or a MCL based on established limits set in other jurisdictions.

GAA: *Thank you for your comment on Annex 5. We had considered your feedback in determining the final parameters.*

Additional General Comments

IUF: Social responsibility management requirements are highly important and should be placed in the main directory, not as an Annex, but as one of the major areas of action for a business which seek to comply with international standards. Companies which are not prepared to set labor relations practices based on full recognition of human rights can not be trusted in any other area.

GAA: *Agreed. The former "Annex 2: Social Responsibility Management Requirements" have been added to the primary text of SPS 5.0.*

Roger C. Tollefsen: Overseas suppliers of seafood should have a packet that provides supporting documentation that is sufficient to meet CFR 21 123.12. This would be provided to US Importers so that the importer could comply with their HACCP requirements at receiving.

GAA: *Thank you for your input. We will take this into consideration as we develop our outreach and guidance materials for SPS 5.0 in the coming year.*

Cooke Aquaculture: If a facility processes both wild and farmed products, are they able to segregate the production and only certify one or the other? Perhaps more relevant to a processor trying to maintain star status for incoming/outgoing product.

GAA: *As with the segregation requirements for varying Star Status (1/2/3/4) products in BAP, so also with farmed and wild-caught products, processors must be capable of separating different production streams. This is not however for the purpose of allowing them to certify one stream vs. another, but is rather for the purpose of ensuring that traceability is maintained, and that there is no unintended mixing of products of differing characteristics. A plant processing both wild and farmed products will be expected to certify the entire production, not just one or the other.*



Cooke Aquaculture: Annexes still refer to GAA/BAP – while we recognize that BAP is the Program Manager, should the annexes not reference GSA as these are requirements of the GSA? References to BAP could confuse what is applicable to farm products versus wild products.

GAA: *Thank you for your feedback. The Seafood Processing Standard is operated and owned by the Global Aquaculture Alliance and has been designed to align with the Global Seafood Assurances Program.*

Cooke Aquaculture: Annex 1: Clearly define primary product forms, versus etc. Is a dry rub or spicing considered the same as marinating? We utilize a spice blend that comes with its own testing from the supplier. Would we be required to take fish from lot 1, sample the whole fish, then take fish from lot 1 and add the spice blend then then be required to conduct the same sampling on the same lot?

GAA: *Thank you for your comment. As a general rule, determination of Primary Product Forms are based on the potential for food safety hazards in processing steps. Thus, if processing steps vary between two types of products, and that variation introduces potentially different hazards, then the products are considered different primary product forms. If the process remains the same, but the ingredients vary (e.g. different types of breeding or spices), then the products are considered the same primary product form. Primary product forms are not a consideration for drug testing requirements of Annex 4, but are considered important under microbiological testing. In the spice blend example, raw fish and raw spice blend coated fish would be considered as separate primary product forms for microbiological testing because there is an additional processing step that could result in additional potential hazards (e.g. temperature, handling, microbiological contamination).*

SOM: As a producer of farmed abalone, our focus is on ensuring the customer receives a quality product that meets their expectations, including that of a product that is safe to eat. Whilst we commend the introduction of certification standards that certifies that the aquaculture producer is producing in a manner that is sustainable and not damaging the environment it does not prevent organisations from farming in an already damaged environment or in an area that has high levels of heavy metals and POP's. Certification gives the consumer greater confidence in the product they are purchasing but as there is no testing of the product for pollutants that can accumulate from a degraded environment into the seafood itself; we believe the standards could go further, in particular, in relation to testing of the finished product. We note the testing requirements of the finished product as listed in Annex 5 and believe this should be extended to include testing for heavy metals and POPS (persistent organic pollutants). We believe that by including these additional tests on the finished product, it will genuinely identify a product that is worthy of global certification. The testing of food should then also put financial



pressure on areas that do have issues with high levels of heavy metals and POP's in their water to clean up the area and I believe this is what is ultimately being aimed at.

GAA: *Thank you for your comment. The BAP farm standards (not the seafood processing standard) do include a requirement for facilities to assess the risks of potential contamination from the farm or its neighboring environment, and heavy metals, pesticides, and PCB's are specifically called out. Testing of soil, water, or farmed product may be required as part of such an assessment, if there is a known or suspected past or present source of contamination. The Mollusk Farm Standard does also require farms to specifically address these risks in Clauses 12.2-12.6.*

NEAQ: Responsible processing plants should not process wild products from endangered or threatened species, and farmed products that are reliant on them for seed (i.e., fattening operations). These species often include, but are not limited to, marine mammals, seabirds, and sea turtles. We propose the following definitions for these species, in addition to any national system used in the country where the processing plant is based: · Critically endangered, endangered, or vulnerable by the International Union for Conservation of Nature (IUCN)· Endangered or threatened under the US Endangered Species Act (ESA),· Critically endangered, endangered, vulnerable, or conservation dependent under the Australian Environment, Protection, and Biodiversity Conservation Act (EPBC);· Endangered or threatened under the Canadian Species at Risk Act (SARA);· Appendix I species under CITES, the Convention on International Trade in Endangered Species of Wild Fauna and Flora, which aims to ensure that international trade does not threaten the survival of wild species- these are not always listed, as they are not available on the market.· Appendix I species under CMS, Convention on the Conservation of Migratory Species of Wild Animals – UNEP.

Processing plants should also not knowingly process products from Illegal, Unreported, and Unregulated (I.U.U.) fishing, or products from destructive fishing practices (specifically including blast/dynamite fishing, cyanide/poison fishing, and Muro-ami). GSA should require plants to have a system in place (e.g., a risk assessment) to avoid raw material associated with these issues. Additionally, farmed products should be consistent with the values of the BAP program. Plants must verify the legal status of source farms (i.e., review permits to farm) and require (possibly through contracts or other agreements) that no human waste or uncooked trashfish or byproducts are used as feed on these source farms.

Byproducts of seafood processing offer the potential to reduce the dependency on reduction fisheries for fishmeal and fish oil used in aquaculture feeds. GSA plants should be required to assess opportunities and maximize byproduct production. Byproducts from environmental certifications (such as BAP, MSC, and others) should be collected, labelled, and stored in ways to maintain assurance that they are from these certified sources, which could then be sold as certified responsible farmed and wild byproduct resources in the future.

Processing plants can also play an important role in enhancing the transparency of seafood products through the supply chain, which could be achieved by increasing the level of detail on product labels and



record keeping. As the scope of the GSA is to cover gaps in fishery and aquaculture certification, we do believe the processing plant standards should extend to large factory vessels that process at sea since, to our knowledge, there isn't a processing plant standard that covers social and environmental issues that applies to these elements of the seafood supply chain.

GAA: *Thank you for your comment and for providing value feedback on these issues. GAA agrees that responsible processing facilities should not process wild products that are associated with illegal practices or species that are endangered or threatened. SPS 5.0 Clause 2.8.1.3 states that "all raw materials acquired from wild harvest sources shall be in full compliance with local, tribal, state federal, or international harvesting regulations", in addition to stringent traceability requirements outlined in Section 9. GAA has been approached by pet feed manufacturers that have an interest in possibly using the BAP logo on pet food made with by-products coming from BAP-certified seafood products. We are working on a mechanism to encourage this. Future updates of the SPS, now that wild-caught products have been included, will increasingly focus upon responsible sourcing practices, and to this end, GAA has entered into arrangements with the Seafish Responsible Fishing Scheme, to globalize its UK-based standard.*

Does BAP have a provision or protocol around confidential reporting in the event higher risk issues are identified. So this is not included in the report given to the facility which could put the worker(s) at risk

GAA: *Thank you for your comment. Currently, BAP works directly with the certification bodies and applicants to assess all non-conformities completely and thoroughly. Our goal is to continue to improve our practices and we will take this into consideration as we make further updates to our program.*