

INTERTEK WORKSHOP CUONG LY – ASC LEAD AUDITOR

VIETFISH 25-AUG-2022





KEY DIFFICULTIES ABOUT



ASC FARM CERTIFICATION IN VIETNAM

Number of ASC certified **farms**updated Aug-2022

In Vietnam until Aug-2022:

- + 98 Shrimp certificates
- + 52 Pangasius certificates

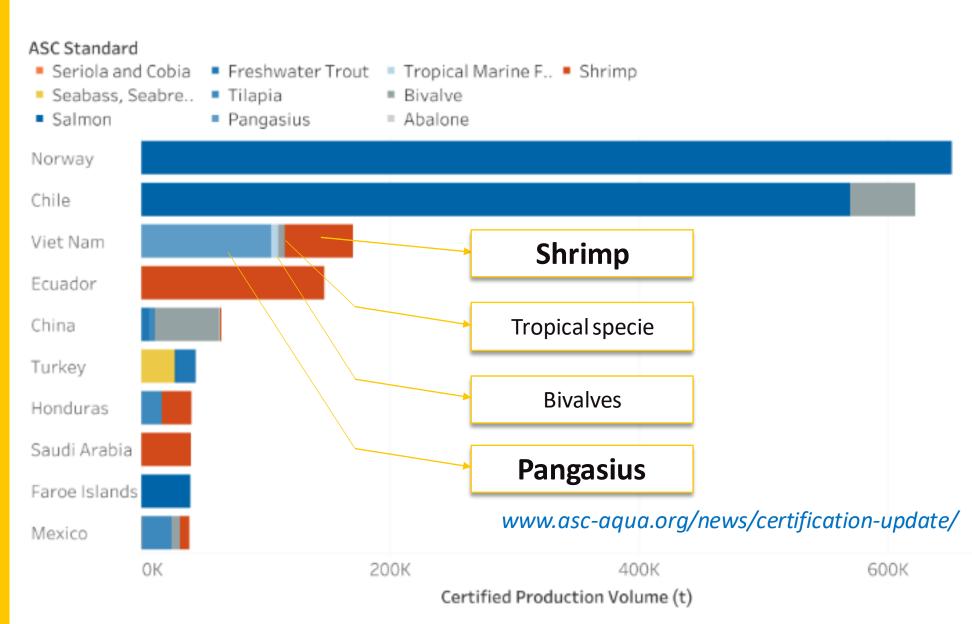
Farm Snapshot

Farm-Sites Certified and in Assessment

Certified		In assesment	Certified	In as	ssessment
Abalone			Seriola/ Cobia		
6	49	6	17	1	
Bivalves	364	119	Shrimp 489	652	Certified Total
Flatfish	1	9	Tilapia 36	4	1,764
Pangasius	41	4	Tropical Marine Finfish	1	In Assessment Total 987
Salmon	599	113	Trout 83	39	707
Seabass/ Seabrean Meagre	n/ 58	13	Seaweed* 21	28	* ASC/MSC Seaweed standard

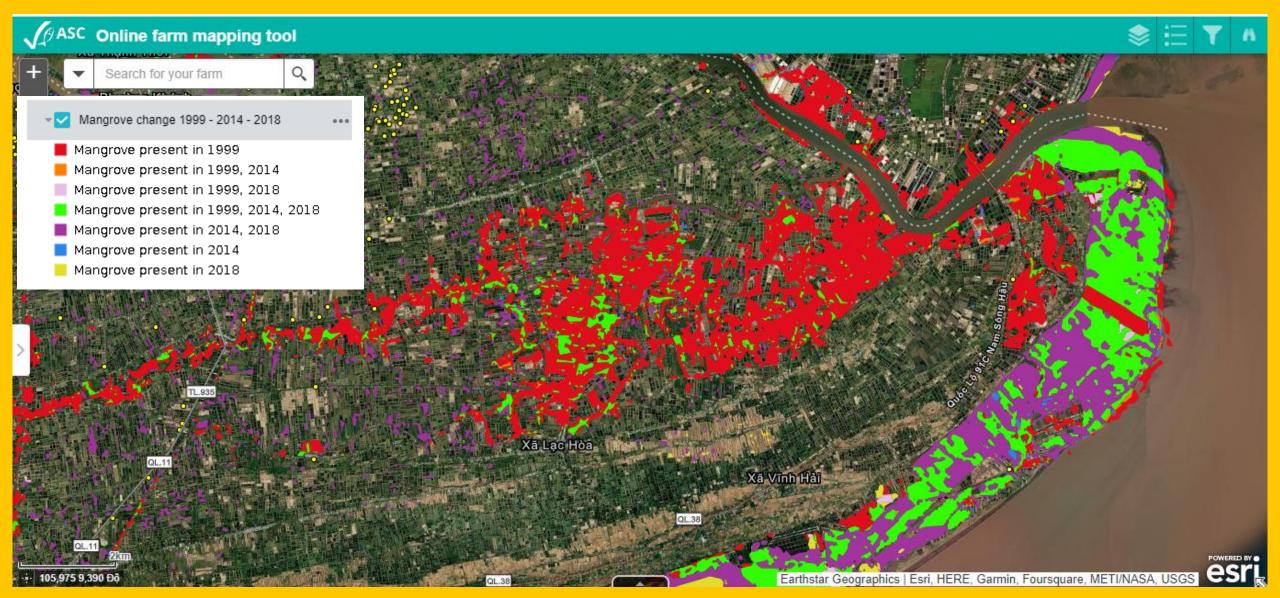
Production Volumes (t) per Standard per Top 10 Countries

ASC certification
by **Volumes**updated Aug-2022



+ 50% at least

ASC, ASI, CABs uses this GIS tool as the most important source of mangrove data.



+ 50% at least

In fact, there are **many situations** during the implementation of ASC certification about mangroves:

- There are other reasons that cause mangrove & wetland loss in Vietnam:
- + conversion of artificial mangrove land to aquaculture land.
- + water pollution
- + natural erosion, climate change
- The non-functional mangrove land are converted
- + just bush of mangrove

ALL OF THESE CASES ARE NOT ACCEPTED BY CABs

- Farms are sitting in the planned area which is official approved by government
- + Government has other plant for mangrove re-habitation

ASC ShAD ver 1.2

Allowance for siting in mangrove ecosystems* & other natural wetlands

- **After** May 1999: None

- **Before** May 1999: permitted

farm shall **compensate 50%** of the affected ecosystem

*mangrove ecosystems: included the human planted mangrove (follow ASC - QA0199)

QA0199 on Shrimp

Determination

Effective date

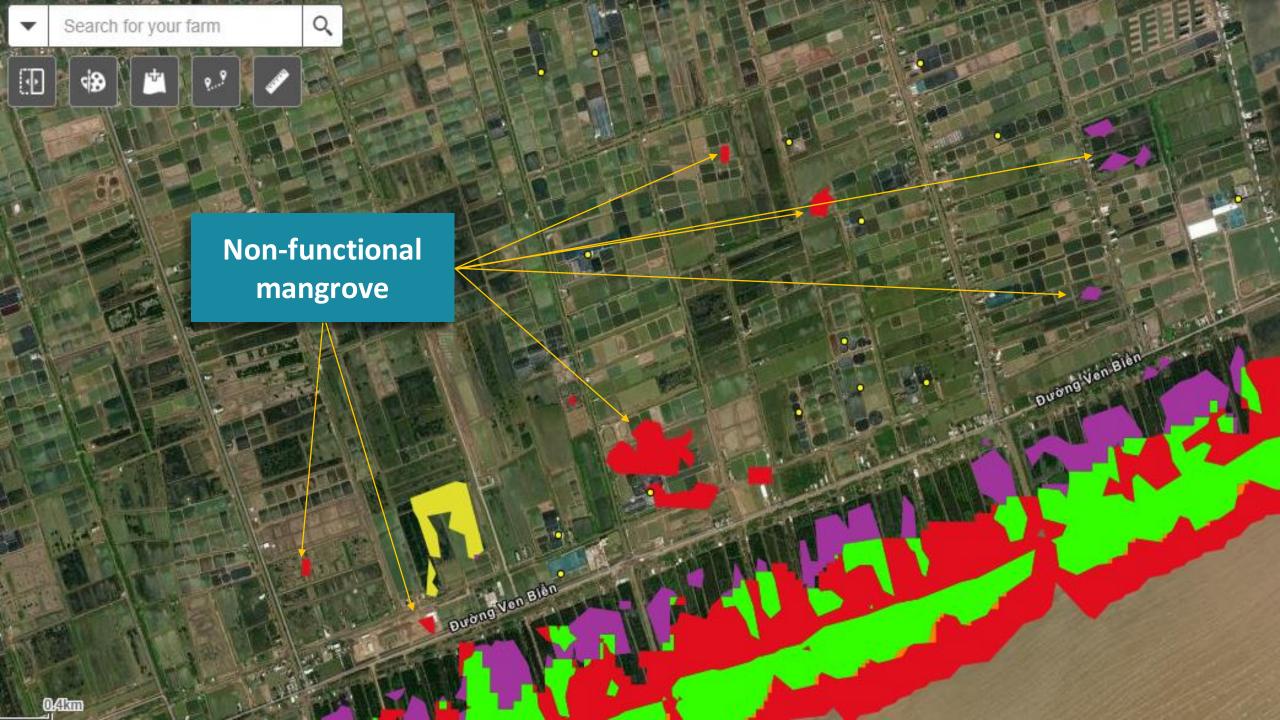
July 12, 2021

Rationale

The ASC shrimp standard refers to mangrove ecosystems in the indicator 2.2.2, it includes human planted mangrove since the intent of the requirement is to maintain the ecosystem functions that mangroves provide, and this is equally applicable for natural and human planted mangroves.

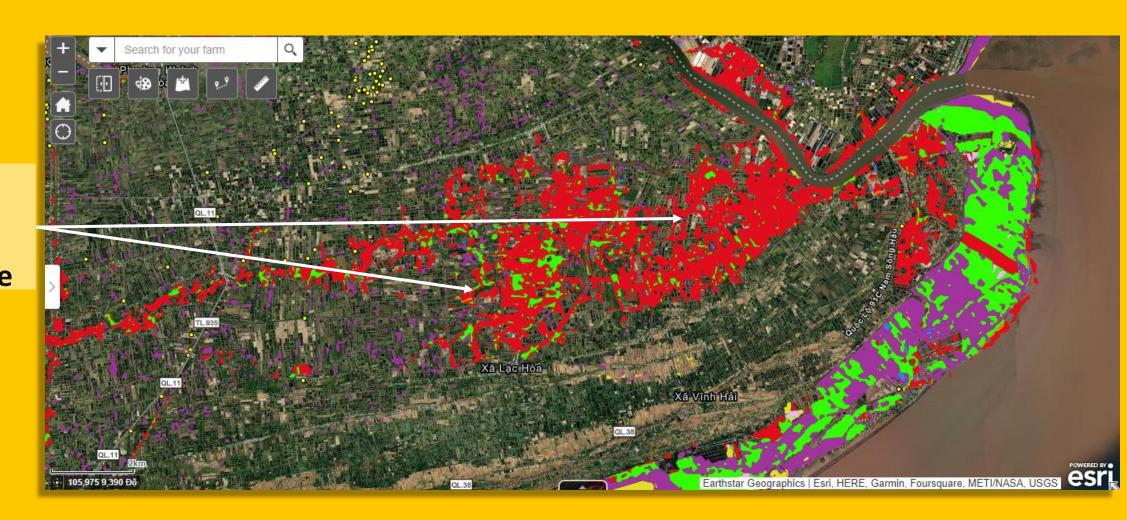
There is no exception for type of mangrove loss that happened Before & After 1999

Although it is justifiable by interviewing community, BEIA expert team or Authority (even with the Authority documented data)



+ 50% at least

Possibly Artificial Mangrove



+ 50% at least

Data on 21-Dec-1999

Actual mangrove status of Vietnam: 156,608 ha

+ *Natural mangrove* : 59,732 ha 38.1%

+ Replanting mangrove: 96,876 ha 61.9%

(follow the decision no. 03/2001/QD/TTg and the notification Jul/2001 of government)

And until 2017

Actual mangrove status of Vietnam: 164,701 ha

(Table 6 – MARD 2018)

→ There are losses of mangrove regionally in some specific sites, but there are not net loss during period of 1999 – 2017 over the entire country. This data shows the government Master-plans for mangrove protection and rehabilitation focuses to some centralized ecosystem sites, synchronized with Master-plan of country economic development.

Decision no. 120/QD-TTg date 22-Jan-2015.

The decision is aim to:

- + protect 310,695 ha of coastline forest,
- + Recover 9,602ha degraded forest
- + Re planting 46,058ha of forest (which included 29,500ha of mangrove)
- → Result of this action is reported in 2017:
- + 42 projects of forest re-habitation is approved
- + 89,000 ha of mangrove are recovered

2.2.2 Allowance for siting in mangrove ecosystems⁷ and other natural wetlands8, or areas of ecological importance as determined by the B-EIA or national/state/local authority plans/list.

The provincial Master plan is granted parallel with

Government's Plan of Mangrove re-habitation.



→ Those data are submitted by producer during the ASC certification audit BUT they are not acceptable by CABs.



None for farms built (with or without permits) after May 1999, except for pumping stations and inlet/outlet canals provided they have been permitted by authorities and an equivalent area is rehabilitated⁹ as compensation.

For farms built or permitted before May 1999, farmers are required to compensate/offset impacts via rehabilitation as determined by the B-EIA, or the national/state/local authority plans/list, or 50% of the affected ecosystem

+ 50% at least

Key suggestions:

There should be more compliance options

- The non-functional, undeveloped mangrove and the artificial mangrove (which are outside of planned-conservation land) can be converted to aquaculture land no matter Before or After May-1999.
- Government rehabilitation data can be accepted when farm is sitting within the approved aquaculture land under the provincial master-plan.



+ CoC Certification is required

ASC ShAD standards does

NOT allow to use antibiotic

on ASC labeled product.

5.3.1. Allowance for use of antibiotic and medicated feed on ASC-labelled products (farm can be certified but specific product receiving medicated feed will not be authorised to carry ASC label).

None

Farms still can be certified.
But in this case, farm will need an ASC CoC Certification for Aquaculture at farm level

This requirement is **ONLY** applicable in the **ASC shrimp** standard.

c. If any antibiotics or medicated feed is used, detail and maintain a traceability system to ensure that no treated product is sold as ASC labeled. In these cases farm needs to hold a valid ASC Chain of Custody Certification.

+ CoC Certification is required

Needs

Two FACTS of ASC certified shrimp farms

Challenges

- + Crustaceans are special because the vaccination is impossible. Treatment is a necessary action to protect the animal welfare, which will also help to reduce mortality rate.
- + Both production & importing countries allow to use antibiotic under the controlled conditions which are defined by laws.
- + When diseases out breaking, the treatment will be for crop protection as well as to protect the investment.

- + To apply any antibiotic treatment on shrimp, farm shall bear the Cost for ASC CoC certification. (this includes the cost for consultant fee, certification fee and human resource to maintain CoC system). Especially, for small house-hold, to obtain a CoC certification is likely impossible.
- + Even farm does not claim the treated product as ASC certified, a certification suspension decision could be granted if CABs find the evidence of antibiotic treatment in the non-CoC-certified farm.

+ CoC Certification is required

Frequent questions that raise to CABs by producers:

- + Why other species can be labeled after treating but shrimp cannot be?
- + Why are shrimp farms not allowed to use antibiotic without CoC certification?
- + Risk are different between farms, why is the ASC risk assessment tool of ASC CAR not just applicable in case of shrimp farm?

ASC CAR 2.2

- 17.6.6 Based on the results found from 17.6.1 -17.6.5 above, the CAB shall determine whether:
- 17.6.6.1 The traceability and segregation systems in the operation are sufficient to ensure all products identified and sold as certified by the operation originate from the unit of certification, or
- 17.6.6.2 The traceability and segregation systems are not sufficient and a separate chain of custody certification is required for the operation before products can be sold as ASC-certified or can be eligible to carry the ASC logo.
- 17.6.7 This determination shall remain in force until revised by the CAB in a subsequent audit or until a valid CoC certification is in place.
- 17.6.7.1 The CAB shall inform the client if any separate CoC certification for the operation required in 17.6.6.2, client shall be subject to an audit by the same CAB that carried out the farm certification.

+ CoC Certification is required

Key suggestions:

- + ASC Shrimp standard allows farmers to apply treatment under the same conditions as its in other ASC specie standards.
- + Shrimp farm's traceability system can be audited & accepted by CABs through the ASC farm audits instead of required ASC CoC certification.



Other difficulties of producers when applying ASC Farm certifications:

Environmental

Operational

Compensation of affected mangrove area:

+ 50% at least

Buffer zone:

- + 100m wide coastlines
- + 25m wide natural river

Analysis of underground water:

+ well water conductance analysis

Analysis of adjacent land:

+ soil conductance analysis

Antibiotics using in shrimp farm:

+ CoC Certification is required

Mortality / survival percentage:

- + max. 20% MR pangasius farm
- + min. 25% SR extensive shrimp farm

Harvest to be witnessed by CAB:

- + Harvest at IA/RA short cycle
- + Harvest 1 time per 3 years long cycle

Feed ingredients:

+ data shall be available at the audit

