

Form 3 - Public Disclosure Form

*This form shall be submitted by the CAB no less than thirty (30) calendar days prior to any onsite audit *. Any changes to this information shall be submitted to the ASC within five (5) days of the change and not later than 10 days before the planned audit. If later, a new announcement is submitted and another 30 days rule will apply.*

*The information on this form shall be public * and should be posted on the ASC website within three (3) days of submission.*

This form shall be written to be readable to the stakeholders and other interested parties.

This form should be translated into local languages when appropriate

PDF 1 Public Disclosure Form

PDF 1.1 Name of CAB

Acoura Marine Ltd.

PDF 1.2 Date of Submission

21st May 2016, updated 26th May 2016

PDF 1.3 CAB Contact Person

PDF 1.3.1 Name of Contact Person

Isla Paterson

PDF 1.3.2 Position in the CAB's organisation

Accreditation officer

PDF 1.3.3 Mailing address

Acoura Marine Ltd,
6, Redheughs Rigg, Edinburgh EH12 9DQ

PDF 1.3.4 Email address	isla.paterson@acoura.com
PDF 1.3.5 Phone number	0131 335 6600
PDF 1.3.6 Other	

PDF 1.4 ASC Name of Client

PDF 1.4.1 Name of Contact Person	Katherine Dolmage
PDF 1.4.2 Position in the client's organisation	Certification Manager
PDF 1.4.3 Mailing address	Suite 124, 1344 Island Highway, Campbell River, Vancouver island, BC Canada V9W 8C9
PDF 1.4.4 Email address	Katherine.Dolmage@marineharvest.com
PDF 1.4.5 Phone number	250 850 3276
PDF 1.4.6 Other	

PDF 1.5 Unit of Certification

PDF 1.5.1 Single Site

PDF 1.5.2 Multi-site

PDF 1.5.3 Group certification

Single Site

PDF 1.6 Sites to be audited

Site Name	GPS Coordinates	Other Location Information	Planned Site Audit(s)	Date of planned audit
Ghi-ya (Bull Harbour)	50 54.089 127 56.362	Hope Island, Goletas Channel	22nd June	20th - 25th June

PDF 1.7 Species and Standards

Standard	Species (scientific name) produced	Included in scope (Yes/No)	ASC endorsed standard to be used	Version Number
Salmon	Salmo salar	Yes	ASC Salmon Standard	1.0

PDF 1.8 Planned Stakeholder Consultation(s) and How Stakeholders can Become Involved

Name/organisation	Relevance for this audit	How to involve this stakeholder (in-person/phone interview/input submission)	When stakeholder may be contacted	How this stakeholder will be contacted
No stakeholder submissions received prior to the onsite audit				

PDF 1.9 Proposed Timeline

PDF 1.9.1 Contract Signed:	April 2016
PDF 1.9.2 Start of audit:	20th June
PDF 1.9.3 Onsite Audit(s):	20th - 25th June
PDF 1.9.4 Determination/Decision:	16th September 2016

PDF 1.10 Audit Team

	Column1	Name	ASC Registration Reference
PDF 1.10.1	Lead Auditor	Matthew James	
PDF 1.10.2	Technical Expert	Chris Findlay	
PDF 1.10.3	Social Auditor	Leon Reed	

ASC Audit Report - Opening

General Requirements

- C1** Audit reports shall be written in English and in the most common language spoken in the areas where the operation is located.
- C2** Audit reports may contain confidential annexes for commercially sensitive information.
 - C2.1** The CAB shall agree the content of any commercially sensitive information with the applicant, which can still be accessible by the ASC and the appointed accreditation body upon request as stipulated in the certification contract.
 - C2.2** The public report shall contain a clear overview of the items which are in the confidential annexes.
 - C2.3** Except for the annexes that contain commercially sensitive information all audit reports will be public.
- C3** The CAB is solely responsible for the content of all reports, including the content of any confidential annexes.
- C4 Reporting Deadlines* for certification and re-certification audit reports**
 - C4.1** Within thirty (30) days of the completing of the audit the CAB shall submit a draft report in English and the national or most common language spoken in the area where the operation is located.
 - C4.2** Within five (5) days the ASC should post the draft report to the ASC website.
 - C4.3** The CAB shall allow stakeholders and interested parties to comment on the report for fifteen (15) days.
 - C4.4** Within twenty (20) days of the close of comments, the CAB shall submit the final report to the ASC in English and the national or most common language spoken in the area where the operation is located.
 - C4.5** Within five (5) days the ASC should post the final report to the ASC website.
 - C4.6** Audit reports shall contain accurate and reproducible results.
- C5 Reporting Deadlines* for surveillance audit reports**
 - C5.1** Within ninety (90) days of the completing of the audit the CAB shall submit a final report in English and the national or most common language spoken in the area where the operation is located.
 - C5.2** Within five (5) days the ASC should post the final report to the ASC website.
 - C5.3** Audit reports shall contain accurate and reproducible results.

1 Title Page

1.1 Name of Applicant

Marine Harvest Canada

1.2 Report Title [e.g. Public Certification Report]	Public Certification Report
1.3 CAB name	Acoura Marine Limited
1.4 Name of Lead Auditor	Matthew James
1.5 Names and positions of report authors and reviewers	Matthew James - Acoura Marine - Lead Auditor and report author Paul MacIntyre - Acoura Marine - Aquaculture Director and report reviewer
1.6 Client's Contact person: Name and Title	Isla Paterson - Accreditation Officer
1.7 Date	20th July 2016

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3 Glossary

Terms and abbreviations that are specific to this audit report and that are not otherwise defined in the ASC glossary

MHC: Marine Harvest Canada
BC: British Columbia
PAR: Pacific Aquaculture Regulations
DFO: Department of Fisheries and Oceans
HR: Human Resources
IBA: Impact and Benefit agreement
CEAA: Canadian Environmental Assessment Agency
FHMP: Fish Health Management Plan
IUCN: International Union for the Conservation of Nature
ROV: Remotely Operated Vehicle
UPEI: University of Prince Edward Island
PFRCC: Pacific Fisheries Resource Conservation Council
BAP: Best Aquaculture Practices
IUU: Illegal, Unreported and Unregulated (fishing)
CFIA: Canadian Food Inspection Agency
OIE: Office Internationale des Epizooties (World Organisation for Animal Health)
OSH: Occupational Safety and Health
BOD: Biochemical Oxygen Demand
PFMA: Pacific Fishery Management Area
UOC: Unit of Certification

4 Summary

A concise summary of the report and findings. The summary shall be written to be readable to the stakeholders and other interested parties.

4.1	A brief description of the scope of the audit	Production of Atlantic Salmon (<i>Salmo salar</i>) at Marine Harvest Canada's Bull Harbour site.
4.2	A brief description of the operations of the unit of certification	Ongrowing of Atlantic Salmon in sea cages

4.3 Type of unit of certification (<i>select only one type of unit of certification in the list</i>)	Single farm
4.4 Type of audit (<i>select all the types of audit that apply in the list</i>)	Initial
4.5 A summary of the major findings	<p>The audit process involved three auditors with two (lead auditor Matthew James and technical expert Chris Findlay), , covering the first five Principles and the non-social related aspects of section eight (This involved document review, staff interviews and a visit to the sea site to confirm some of the working practices). The SA8000 auditor (Leon Reed) covered Principles six and seven (and relevant parts of section 8) by initially attending the central offices in Campbell river to conduct a combination of document reviews and staff interviews and then attending the site with the Lead Auditor to carry out site staff interviews. The audit findings were then summarised in a closing meeting on the Saturday.</p> <p>The evaluation of Marine HarvestCanada's Ghi Ya (Bull Harbour) site demonstrated a good overall level of compliance to the ASC salmon standard version 1.0 and benefited from previous audits carried out for Marine Harvest Canada on other sites, efficient preparation and good document controls.</p> <p>At the time of the draft report publication there have been no stakeholder communications.</p> <p>It should be noted that Marine Harvest Canada elected not to redact any information (no information excluded due to confidentiality) from the audit report therefore there is no separate 'redacted' version or Confidential Annexes.</p>
4.6 The Audit determination	<p>The CAB has received acceptable corrective actions for the Major non-conformities identified and having reviewed stakeholder contributions received following publication of the draft report, has determined that the MHC Bull Harbour farm may be certified to the ASC Salmon Standard.</p>

5 CAB Contact Information

5.1 CAB Name	Acoura Marine Limited
5.2 CAB Mailing Address	isla.paterson@acoura.com

5.3 Email Address

isla.paterson@acoura.com

5.4 Other Contact Information

Acoura Marine Ltd., 6 Redheughs Rigg, Edinburgh EH 12 9DQ

6 Background on the Applicant

6.1 Information on the Public Disclosure Form (Form 3) except 1.2-1.3 All information updated as necessary to reflect the audit as conducted.

Information as declared on Public disclosure form.

6.2 A description of the unit of certification (*for initial audit*) / changes, if any (*for surveillance and recertification audits*)

Bull Harbour Production Site, Goletas Channel, British Columbia.
Lat: 50 54.089 Long: 127 56.362

6.3 Other certifications currently held by the unit of certification

GlobalAquaculture Alliance / Best Aquaculture Practices Salmon Farm Standard

6.4 Other certification(s) obtained before this audit

GlobalAquaculture Alliance / Best Aquaculture Practices Salmon Farm Standard

6.5 Estimated annual production volumes of the unit of certification of the current year

498 Metric Tonnes

6.6 Actual annual production volumes of the unit of certification of the previous year (*mandatory for surveillance and recertification*)

N/A First Cycle.

6.7 Production system(s) employed within the unit of certification (<i>select one or more in the list</i>)	Sea Cages
6.8 Number of employees working at the unit of certification	Six

7 Scope

7.1 The Standard(s) against which the audit was conducted, including version number	ASC Salmon Standard version 1.0
7.2 The species produced at the applicant farm	Atlantic Salmon (<i>Salmo salar</i>)
7.3 A description of the scope of the audit including a description of whether the unit of certification covers all production or harvest areas (i.e. ponds) managed by the operation or located at the included sites, or whether only a sub-set of these are included in the unit of certification. If only a sub-set of production or harvest areas are included in the unit of certification these shall be clearly named.	Scope of the audit covers all production located at the Bull Harbour site.
7.4 The names and addresses of any storage, processing, or distribution sites included in the operation (including subcontracted operations) that will potentially be handling certified products, up until the point where product enters further chain	The ASC Chain of Custody starts from the point at which salmon are delivered into the MHC Processing Plant at Port Hardy (ASC-C-00540 valid to 19th January 2018). Delivery takes place live by wellboat, this operation being sub-contracted to the Port Hardy operation.

7.5 Description of the receiving water body(ies).

Goletas Channel, British Columbia.

8 Audit Plan

8.1 The names of the auditors and the dates when each of the following were undertaken or completed: conducting the audit, writing of the report, reviewing the report, and taking the certification decision.

Lead Auditor: M.James
 Social Auditor : Leon Reed
 Technical Expert: Chris Findlay (remote)
 Prior to the audit several days were taken analysing information submitted prior to the on-site visit and office visit. The 20th - 25th June were spent in BC with a day on each site with the remaining time auditing the various principles. Further collation of information and report writing took place over a number of days prior to the draft report being completed and sent to the ASC.
 Certification decision taken on the 7th October 2016.

8.2 Previous Audits (if applicable):

- 8.2.1 Initial audit - mm/yyyy
- Surveillance audit 1 - mm/ yyyy
- Surveillance audit 2 - mm/ yyyy
- Recertification audit - mm/ yyyy
- Unannounced audit - mm/ yyyy
- NC close-out audit - mm/ yyyy
- Scope extension audit mm/ yyyy

		N/A no previous audits

8.4 Audit plan as implemented including:

- 8.4.1 Desk Reviews
- 8.4.2 Onsite audits
- 8.4.3 Stakeholder interviews and Community meetings

Dates	Locations
Pre-audit	Fish Vet Group Inverness and Acoura Marine, Edinburgh, Scotland
20th - 25th June 2016	Bull Harbour Site
	None Requested

8.4.4 Draft report sent to client

17th August 2016

8.4.5 Draft report sent to ASC

2nd August 2016

8.5.5 Final report sent to Client and ASC

7th October 2016

8.7 Names and affiliations of individuals consulted or otherwise involved in the audit including: representatives of the client, employees, contractors, stakeholders and any observers that participated in the audit.

Certification Manager - Katherine Dolmage, Site Manager - Jason Fraser,
 First Nation and Community Relations Manager - Leith Paganoni,
 HR Manager - Tina Garlinsky - Gonsky,
 Freshwater Planner - Juan Carlos Sanchez-Millar,
 Health and Safety Manager - Blaine Trembley

8.8 Stakeholder submissions, including written or other documented information and CAB written responses to each submission.

Name of stakeholder (if permission given to make name public)	Relevance to be contacted	Date of contact	CAB responded Yes/No	Brief summary of points Raised	Use of comment by CAB	Response sent to stakeholder
Living Oceans Society, in conjunction with David Suzuki Foundation, Watershed Watch Salmon Society and Ecology Action Centre	Regional NGO based in Vancouver and In relation to wild fishery, sea lice and sea mammals interests.	19th September 2016	Yes	Various - please see copy of correspondence at the end of the report.	Please see copy of correspondence at the end of the report.	Yes, 5th October 2016.

AUDIT MANUAL - ASC Salmon Standard
Created by the Salmon Aquaculture Dialogue

Scope: species belonging to the genus *Salmo* and *Oncorhynchus*

PRINCIPLE 1: COMPLY WITH ALL APPLICABLE NATIONAL LAWS AND LOCAL REGULATIONS

Criterion 1.1 Compliance with all applicable local and national legal requirements and regulations

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
1.1.1	Indicator: Presence of documents demonstrating compliance with local and national regulations and requirements on land and water use Requirement: Yes Applicability: All	a. Maintain digital or hard copies of applicable land and water use laws.	The PAR license for Bull Harbour (Facility Number 7053) is AQFF 113598 2015/2016. Land file number is 1414224. PFMA 12-15. Expires in 18th December 2016.	Compliant	
		b. Maintain original (or legalised copies of) lease agreements, land titles, or concession permit on file as applicable.	Navigable waters protection act. License of occupation. Forestry land and ministry of lands and natural resources license number 1407749. Expiry 30/6/17.		
		c. Keep records of inspections for compliance with national and local laws and regulations (if such inspections are legally required in the country of operation).	DFO auditing and enforcement activities will confirm GPS co-ordinates, Lice monitoring fish health record, FHMP compliance, Benthic surveys and site debris. The last audit is available on the DFO website 17h September 2015, no further action required).		
		d. Obtain permits and maps showing that the farm does not conflict with national preservation areas.	Marine Plan Partnership (MaPP) for North Vancouver Island confirms that Bull Harbour is not located in a conservation area this has been signed off by the Province of BC, and involved many stakeholders. Visual confirmation is available at www.mappocean.org		
		e. Others, please describe			
1.1.2	Indicator: Presence of documents demonstrating compliance with all tax laws Requirement: Yes Applicability: All	a. Maintain records of tax payments to appropriate authorities (e.g. land use tax, water use tax, revenue tax). Note that CABs will not disclose confidential tax information unless client is required to or chooses to make it public.	Typical taxes include federal corporate income tax, federal and provincial consumer taxes, payroll taxes, property taxes most are filed monthly except the property taxes which are on an annual basis. A report from an independent company was easily retrievable both for taxes and for insurance purposes.	Compliant	
		b. Maintain copies of tax laws for jurisdiction(s) where company operates.	The farm is assessed for Tax rates on land use below the water. The footprint of the accommodation and the cages.		
		c. Register with national or local authorities as an "aquaculture activity".	The demand for taxes shows that MHC Campbell river is classed as a fish farmer of Atlantic salmon.		
		d. Others, please describe			
1.1.3	Indicator: Presence of documents demonstrating compliance with all relevant national and local labor laws and regulations Requirement: Yes	a. Maintain copies of national labor codes and laws applicable to farm (scope is restricted to the farm sites within the unit certification.)	The BC Employment Standards Act - this details minimum wages and rights for employees and collective agreements and bargaining. The Minister of Labor, Citizens Services and Open Government is the relevant Authority. The minimum wage is \$10.45/hour and the minimum work age is 15	Compliant	
		b. Keep records of farm inspections for compliance with national labor laws and codes (only if such inspections are legally required in the country of operation).	NA - Inspections are not required in BC		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
	Applicability: All	c. Others, please describe			
1.1.4	Indicator: Presence of documents demonstrating compliance with regulations and permits concerning water quality impacts Requirement: Yes Applicability: All	a. Obtain permits for water quality impacts where applicable.	There is no separate permit required to demonstrate requirements for water quality impacts for the marine sites in the licenses required.	Compliant	
		b. Compile list of and comply with all discharge laws or regulations.	There is a government database showing all the companies in Canada that discharge into the water . Listed are the two relevant hatcheries Ocean Falls, and Dalrymple are listed showing permit and regulation numbers. The database can be accessed on www.gov.bc.ca		
		c. Maintain records of monitoring and compliance with discharge laws and regulations as required.	Section 8 of this audit confirms discharges for the hatcheries. There is no effluent discharge as such for this farm site.		
		d. Others, please describe			

PRINCIPLE 2: CONSERVE NATURAL HABITAT, LOCAL BIODIVERSITY AND ECOSYSTEM FUNCTION

Criterion 2.1 Benthic biodiversity and benthic effects [1]

2.1.1	Indicator: Redox potential or [2] sulphide levels in sediment outside of the Allowable Zone of Effect (AZE) [3], following the sampling methodology outlined in Appendix I-1 Requirement: Redox potential > 0 millivolts (mV) or Sulphide ≤ 1,500 microMoles / l Applicability: All farms except as	a. Prepare a map of the farm showing boundary of AZE (30 m) and GPS locations of all sediment collections stations. If the farm uses a site-specific AZE, provide justification [3] to the CAB.	Benthic sampling is a federal requirement and consequently falls under DFO legislation. Evidence provided of benthic samples taken in the following locations: 5m inside and 25m outside the Depomod AZE on 3 transects; 2 cage edge and 2 reference stations, at a pre peak biomass, on 5/6 May 2016. MH Canada confirmed sampling would be repeated in September 2016. Analysis of initial sampling results expected August 2016. The site has been modelled to produce a site specific AZE. Results of re-sampling at peak biomass in September will be re-assessed at	Minor	A minor NC has been raised. The audit has been scheduled prior to the farm reaching peak biomass. Compliance cannot be assessed for 2.1.1, 2.1.2 or 2.1.3. The farm has demonstrated an understanding of the requirements and an intention to sample at the appropriate point in the production cycle
		b. If benthos throughout the full AZE is hard bottom, provide evidence to the CAB and request an exemption from 2.1.1c-f, 2.1.2 and 2.1.3.	Sand bottom from operational monitoring report September 17th 2015 by Mainstream Biological Consulting.		
		c. Inform the CAB whether the farm chose option #1 or option #2 to demonstrate compliance with the requirements of the Standard.	Sulphide sampling occurs as part of the legislative requirement, option #2 has been chosen		
		d. Collect sediment samples in accordance with the methodology in Appendix I-1 (i.e. at the time of peak cage biomass and at all required stations).	Peak biomass anticipated to be reached September (new Site). Current stock of 517,556 @ 4.02 kgs, biomass 2,082 tonnes.		
		e. For option #1, measure and record redox potential (mV) in sediment samples using an appropriate, nationally or internationally recognized testing method.	N/A, see 2.1.1a		

	Compliance Criteria (Use as guidance for audit only)	Audit evidence 1. Write down all audit evidence for each compliance criterion (CC). Audit evidence (including evidence of conformity and nonconformity) should be recorded so that the audit can be repeated by a different audit team. 2. Replace explanatory text in the 'Audit Evidence' column as appropriate. 3. If you see any Compliance Criteria which is not listed below, please describe in the blue cells below .	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
Applicability: All farms except as noted in [1]	f. For option #2, measure and record sulphide concentration (uM) using an appropriate, nationally or internationally recognized testing method. g. Submit test results to ASC as per Appendix VI at least once for each production cycle. If site has hard bottom and cannot complete tests, report this to ASC. h. Others, please describe	Sampling at peak biomass will occur in September 2016 (new site) Sampling at peak biomass will occur in September 2016 (new site)		
2.1.2 Indicator: Faunal index score indicating good [4] to high ecological quality in sediment outside the AZE, following the sampling methodology outlined in Appendix I-1 Requirement: AZTI Marine Biotic Index (AMBI [5]) score ≤ 3.3, or Shannon-Wiener Index score > 3, or Benthic Quality Index (BQI) score ≥ 15, or Infaunal Trophic Index (ITI) score ≥ 25 Applicability: All farms except as noted in [1]	a. Prepare a map showing the AZE (30 m or site specific) and sediment collections stations (see 2.1.1). b. Inform the CAB whether the farm chose option #1, #2, #3, or #4 to demonstrate compliance with the requirement. c. Collect sediment samples in accordance with Appendix I-1 (see 2.1.1). d. For option #1, measure, calculate and record AZTI Marine Biotic Index [5] score of sediment samples using the required e. For option #2, measure, calculate and record Shannon-Wiener Index score of sediment samples using the required f. For option #3, measure, calculate and record Benthic Quality Index (BQI) score of sediment samples using the required method. g. For option #4, measure, calculate and record Infaunal Trophic Index (ITI) score of sediment samples using the required h. Retain documentary evidence to show how scores were obtained. If samples were analyzed and index calculated by an independent laboratory, obtain copies of results. i. Submit faunal index scores to ASC (Appendix VI) at least once for each production cycle. j. Others, please describe	See 2.1.1 Option #2 will be used See 2.1.1 N/A Peak biomass not yet reached, see 2.1.1 N/A N/A N/A See 2.1.1f	Compliant	
Indicator: Number of macrofaunal taxa in the sediment within the AZE, following the sampling methodology outlined in Appendix I-1	a. Document appropriate sediment sample collection as for 2.1.1a and 2.1.1c, or exemption as per 2.1.1b. b. For sediment samples taken within the AZE, determine abundance and taxonomic composition of macrofauna using an appropriate testing method. c. Identify all highly abundant taxa [6] and specify which ones (if any) are pollution indicator species.	See 2.1.1 See 2.1.1 See 2.1.1		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
2.1.3	<p>Requirement: ≥ 2 highly abundant [6] taxa that are not pollution indicator species</p> <p>Applicability: All farms except as noted in [1]</p>	<p>d. Retain documentary evidence to show how taxa were identified and how counts were obtained. If samples were analyzed by an independent lab, obtain copies of results.</p> <p>e. Submit counts of macrofaunal taxa to ASC (Appendix VI) at least once for each production cycle.</p> <p>f. Others, please describe</p>	<p>1. Write down all audit evidence for each compliance criterion (CC). Audit evidence (including evidence of conformity and nonconformity) should be recorded so that the audit can be repeated by a different audit team.</p> <p>2. Replace explanatory text in the 'Audit Evidence' column as appropriate.</p> <p>3. If you see any Compliance Criteria which is not listed below, please describe in the blue cells below.</p> <p>Samples will be analysed by Columbia Science. Ms Lipovsky is an experienced marine taxonomist and registered professional biologist (RPBio) in British Columbia, with recognised specialities in invertebrates, aquaculture and</p> <p>See 2.1.1</p>	Compliant	
2.1.4	<p>Indicator: Definition of a site-specific AZE based on a robust and credible [7] modeling system</p> <p>Requirement: Yes, within three years of the publication [8] of the SAD standard (i.e. full compliance by June 13, 2015)</p> <p>Applicability: All farms except as noted in [1]</p>	<p>a. Undertake an analysis to determine the site-specific AZE and depositional pattern before 3 years have passed since publication of the Standard on June 13, 2012.</p> <p>b. Maintain records to show how the analysis (in 2.1.4a) is robust and credible based on modeling using a multi-parameter approach [7].</p> <p>c. Maintain records to show that modeling results for the site-specific AZE have been verified with > 6 months of monitoring data.</p> <p>d. Others, please describe</p>	<p>Document 'Ghi ya (Bull Harbour) Pacific Marine Finfish Aquaculture Application November 2013' contained evidence that the site had been modelled to determine a site specific AZE</p> <p>The Globally Recognised modelling system 'DEPOMOD' was used in the determination as required by government. The benthic sampling being undertaken currently are the first samples taken since production commenced at since production commenced at Bull Harbour. Evidence supplied that pre entry survey requirements had been met (reponse from DFO 23 October 2015). DEPOMOD has been ground-truthed for accuracy, sampling on 1g contours will confirm the model.</p>	Compliant	
Criterion 2.2 Water quality in and near the site of operation [12]					
2.2.1	<p>Indicator: Weekly average percent saturation [13] of dissolved oxygen (DO) [14] on farm, calculated following methodology in Appendix 4</p> <p>Requirement: ≥ 70% [15]</p> <p>Applicability: All farms except as noted in [15]</p>	<p>a. Monitor and record on-farm percent saturation of DO at a minimum of twice daily using a calibrated oxygen meter or equivalent method. For first audits, farm records must cover ≥ 6 months.</p> <p>b. Provide a written justification for any missed samples or deviations in sampling time.</p> <p>c. Calculate weekly average percent saturation based on data.</p> <p>d. If any weekly average DO values are < 70%, or approaching that level, monitor and record DO at a reference site and compare to on-farm levels (see Instructions).</p> <p>e. Arrange for auditor to witness DO monitoring and calibration while on site.</p>	<p>Records supplied of weekly averages from 24 September 2015</p> <p>Data provided (two readings per day, seven days / week) up to 20 May in information provided to ASC, readings confirmed as continued to be logged during site visit</p> <p>Data provided, weekly average 92% ,always in excess of the minimum required</p> <p>Data provided, weekly average 92% ,always in excess of the minimum required</p> <p>checks recorded in Aquafarmer readings at surface, 5 and 10m before feeding and 6pm now and shorter window in winter. If values expected to be lower then check before feeding. Temperature readings taken, current values @ 10.3c and salinity @34 -35ppt. Minimum value for DO for the last 6 months @6.3 mg/l with no gaps.</p>	Compliant	

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
		f. Submit results from monitoring of average weekly DO as per Appendix VI to ASC at least once per year.	DO data confirmed submitted to ASC		
		g. Others, please describe			
2.2.2	Indicator: Maximum percentage of weekly samples from 2.2.1 that fall under 2 mg/liter DO Requirement: 5% Applicability: All	a. Calculate the percentage of on-farm samples taken for 2.2.1a that fall under 2 mg/l DO.	None, readings range between 6.3 and 12.2 mg/L	Compliant	
		b. Submit results from 2.2.2a as per Appendix VI to ASC at least once per year.	See 2.2.1f		
		c. Others, please describe			
2.2.3	Indicator: For jurisdictions that have national or regional coastal water quality targets [16], demonstration through third-party analysis that the farm is in an area recently [17] classified as having “good” or “very good” water quality [18] Requirement: Yes [19] Applicability: All farms except as noted in [19]	a. Inform the CAB whether relevant targets and classification systems are applicable in the jurisdiction. If applicable, proceed to "2.2.3.b". If not applicable, take action as required under 2.2.4	The only water Quality guidelines document found for reference is the Canadian Councils of Ministers of the environment 'water quality guidelines for the protection of aquatic life' and the specified parameter for marine water quality is Nitrate concentration for which the short term guideline value given is 1,500 mg/l and the long term value is 200 mg/l Document provided for 'Nutrient release for net cage culture (GlobalAquafood Development Corporation April 2014)	Compliant	
		b. Compile a summary of relevant national or regional water quality targets and classifications, identifying the third-party responsible for the analysis and classification.	Review conclusions of 'Nutrient release for net cage culture (GlobalAquafood Development Corporation April 2014) states "the data and literature reviewed indicates that the water quality in coastal British Columbia, and in particular Queen Charlotte strait and the Broughton Archipelago Region, can be considered very good and remain largely unaffected by the fish farming sector		
		c. Identify the most recent classification of water quality for the area in which the farm operates.	Bull Harbour site is located in the Queen Charlotte Strait.		
		d. Others, please describe			
2.2.4	Indicator: For jurisdictions without national or regional coastal water quality targets, evidence of weekly monitoring of nitrogen and phosphorous [20] levels on farm and at a reference site, following methodology in Appendix I-5	a. Develop, implement, and document a weekly monitoring plan for N, NH4, NO3, total P, and ortho-P in compliance with Appendix I-5, testing a minimum of once weekly in both locations. For first audits, farm records must cover ≥ 6 months.	N/A, covered by monitoring of Nitrate levels for Marine Area water quality guidelines	N/A	
		b. Calibrate all equipment according to the manufacturer's recommendations.	N/A, covered by monitoring of Nitrate levels for Marine Area water quality guidelines		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
	Requirement: Yes Applicability: All farms except as noted in [19]	c. Submit data on N and P to ASC as per Appendix VI at least once per year. d. Others, please describe	N/A, covered by monitoring of Nitrate levels for Marine Area water quality guidelines		
2.2.5	Indicator: Demonstration of calculation of biochemical oxygen demand (BOD [21]) of the farm on a production cycle basis Requirement: Yes Applicability: All	a. Collect data throughout the course of the production cycle and calculate BOD according to formula in the instruction box. b. Submit calculated BOD as per Appendix VI to ASC for each production cycle. c. Others, please describe	BOD calculation sighted on spreadsheet, confirmed as generated using Aquafarmer information N/A as first cycle, no completed cycle data available.	Compliant	
Criterion 2.3 Nutrient release from production					
2.3.1	Indicator: Percentage of fines [22] in the feed at point of entry to the farm [23] (calculated following methodology in Appendix I-2) Requirement: < 1% by weight of the feed Applicability: All farms except as noted in [23]	a. Determine and document a schedule and location for quarterly testing of feed. If testing prior to delivery to farm site, document rationale behind not testing on site. b. If using a sieving machine, calibrate equipment according to manufacturer's recommendations. c. Conduct test according to detailed methodology in Appendix I-2 and record results for the pooled sample for each quarter. For first audits, farms must have test results from the last 3 d. Others, please describe	ASC Site manual (August 7th 2015) specifies the sampling procedure as laid out in the appendix 1-2. Most recent quarterly sample March 9th 2016 gives 0% fines. Manual sieves are centrally located and distributed as required N/A, no machine usage, only manual. Records included on the ASC Monthly impementation sheets	Compliant	
Criterion 2.4 Interaction with critical or sensitive habitats and species					
2.4.1	Indicator: Evidence of an assessment of the farm's potential impacts on biodiversity and nearby ecosystems that contains at a minimum the components outlined in Appendix I-3 Requirement: Yes Applicability: All	a. Perform (or contract to have performed) a documented assessment of the farm's potential impact on biodiversity and nearby ecosystems. The assessment must address all components outlined in Appendix I-3. b. If the assessment (2.4.1a) identifies potential impact(s) of the farm on biodiversity or nearby critical, sensitive or protected habitats or species, prepare plan to address those potential impacts. c. Keep records to show how the farm implements plan(s) from 2.4.1b to minimize potential impacts to critical or sensitive habitats and species.	2013 Site survey carried out to the Specific marine finfish aquaculture application for Bull Harbour specifically considers e.g. the 49 fauna and 34 flora species and confirmed no conflict with the Species At Risk Act or IUCN Red List (endangered or above) (underwater ROV and sediment surveys similar, DFO limit restrictions (e.g. for Northern Abalone population numbers) seen to be compliant. Englewood reef compensation for eelgrass (Biologist Cynthia Durance) sighted February 2006 with specific selection of an appropriate area to both provide a suitable fisheries habitat and assist with sediment remediation Considered within the environmental Plan.	Compliant	

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
		d. Others, please describe			
2.4.2	Indicator: Allowance for the farm to be sited in a protected area [24] or High Conservation Value Areas [25] (HCVAs) Requirement: None [26] Applicability: All farms except as noted in [26]	a. Provide a map showing the location of the farm relative to nearby protected areas or High Conservation Value Areas (HCVAs) as defined above (see also 1.1.1a).	Bull Harbour is within a general management area, holding no enhanced status relevant to conservation area.	Compliant	
		b. If the farm is <u>not</u> sited in a protected area or High Conservation Value Area as defined above, prepare a declaration attesting to this fact. In this case, the requirements of 2.4.2c-d do not apply.	Richard Opala, Regulatory affairs manager statement dated 16th April 2014 specifies that governmental restriction would not permit such activity to take place, also confirmed by examination of BC Government maps showing restricted areas and farms indicated to be outwith these.		
		c. If the farm <u>is</u> sited in a protected area or HCVA, review the scope of applicability of Indicator 2.4.2 (see Instructions above) to determine if your farm is allowed an exception to the requirements. If yes, inform the CAB which exception (#1, #2, or #3) is allowed and provide supporting evidence.	N/A, Bull Harbour is within a general management area, holding no enhanced status relevant to conservation area.		
		d. If the farm is sited in a protected area or HCVA and the exceptions provided for Indicator 2.4.2 <u>do not apply</u> , then the farm does not comply with the requirement and is ineligible for ASC certification.	N/A, Bull Harbour is within a general management area, holding no enhanced status relevant to conservation area.		
		e. Others, please describe			
Criterion 2.5 Interaction with wildlife, including predators [27]					
2.5.1	Indicator: Number of days in the production cycle when acoustic deterrent devices (ADDs) or acoustic harassment devices (AHDs) were used Requirement: 0, within three years of the date of publication [28] of the SAD standard (i.e. full compliance by June 13, 2015)	a. Prepare a written statement affirming that the farm's management is committed to eliminate all usage of acoustic deterrent devices (ADDs) or acoustic harassment devices (AHDs) by June 13, 2015.	N/A No ADD Use on sites as specifically prohibited by Government	Compliant	
		b. Compile documentary evidence to show that no ADDs or AHDs were used by the farm after June 13, 2015 (applicable only after the specified date).	No ADD Use on sites as specifically prohibited by Government		
		-	No ADD Use on sites as specifically prohibited by Government		
		d. Others, please describe			
2.5.2	Indicator: Prior to the achievement of 2.5.1, if ADDs or AHDs are used, maximum percentage of days [29] in the production cycle that the devices are operational	a. Maintain a log for the use of any ADDs or AHDs on farm that includes recording the number of days (24-hour cycles) during which the devices were used.	No ADD Use on sites as specifically prohibited by Government	Compliant	
		b. Calculate the percentage of days in the production cycle that the devices were operational in the most recent complete production cycle.	No ADD Use on sites as specifically prohibited by Government		
		-	No ADD Use on sites as specifically prohibited by Government (clause relates to percentage of time ADDs used)		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
	Requirement: ≤ 40% Applicability: All, until June 13, 2015	d. Submit data on number of days that ADDs/AHDs were used to the ASC as per Appendix VI. Data must be sent to ASC on an ongoing basis (i.e. at least once per year and for each production cycle). e. Others, please describe	1. Write down all audit evidence for each compliance criterion (CC). Audit evidence (including evidence of conformity and nonconformity) should be recorded so that the audit can be repeated by a different audit team. 2. Replace explanatory text in the 'Audit Evidence' column as appropriate. 3. If you see any Compliance Criteria which is not listed below, please describe in the blue cells below . No ADD Use on sites as specifically prohibited by Government		
2.5.3	Indicator: Number of mortalities [30] of endangered or red-listed [31] marine mammals or birds on the farm Requirement: 0 (zero) Applicability: All	a. Prepare a list of all predator control devices and their locations. b. Maintain a record of all predator incidents. c. Maintain a record of all mortalities of marine mammals and birds on the farm identifying the species, date, and apparent cause of death. d. Maintain an up-to-date list of endangered or red-listed marine mammals and birds in the area (see 2.4.1) - f. Others, please describe	Each 120m2 circular cage net has a protective predator exclusion net. Net maintenance by divers (SW957) and non-diver (i.e.lifting) procedure SW958 specified. Replacement policy for predator nets confirmed in place. Electric fences and top nets are also deployed for predator exclusion. No predator incidents recorded which would raise concerns relating to possible fish escapes. No marine mammal or bird mortalities recorded for this site. Listing of species within the wildlife interaction plan (as per BAP requirement) SW 965 including Cetaceans, other marine mammals and birds listed by species. Confirmed through DFO "public reporting of aquaculture" website that no marine mammals or bird mortalities within the categories stated occurred.	Compliant	
2.5.4	Indicator: Evidence that the following steps were taken prior to lethal action [32] against a predator: 1. All other avenues were pursued prior to using lethal action 2. Approval was given from a senior manager above the farm manager 3. Explicit permission was granted to take lethal action against the specific animal from the relevant regulatory authority Requirement: Yes [33]	a. Provide a list of all lethal actions that the farm took against predators during the previous 12-month period. Note: "lethal action" is an action taken to deliberately kill an animal, including marine mammals and birds. b. For each lethal action identified in 2.5.4a, keep record of the following: 1) a rationale showing how the farm pursued all other reasonable avenues prior to using lethal action; 2) approval from a senior manager above the farm manager of the lethal action; 3) where applicable, explicit permission was granted by the relevant regulatory authority to take lethal action against the animal.	Specific MH Canada policy in place (Predator avoidance plan SW137 (last update November 2015, originated 2012) prohibiting the deliberate killing of any marine mammals or birds, specifically stating a No Kill policy covering seals and sea lions. N/A see above	Compliant	

		Compliance Criteria (Use as guidance for audit only)	Audit evidence 1. Write down all audit evidence for each compliance criterion (CC). Audit evidence (including evidence of conformity and nonconformity) should be recorded so that the audit can be repeated by a different audit team. 2. Replace explanatory text in the 'Audit Evidence' column as appropriate. 3. If you see any Compliance Criteria which is not listed below, please describe in the blue cells below .	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
	Applicability: All except cases where human safety is endangered as noted in [33]	c. Provide documentary evidence that steps 1-3 above (in 2.5.4b) were taken prior to killing the animal. If human safety was endangered and urgent action necessary, provide documentary evidence as outlined in [33]. d. Others, please describe	N/A see above		
2.5.5	Indicator: Evidence that information about any lethal incidents [35] on the farm has been made easily publicly available [34] Requirement: Yes Applicability: All	a. For all lethal actions (see 2.5.4), keep records showing that the farm made the information available within 30 days of occurrence. b. Ensure that information about all lethal actions listed in 2.5.5a are made easily publicly available (e.g. on a website). c. Others, please describe	N/A see above. N/A see above.	Compliant	
2.5.6	Indicator: Maximum number of lethal incidents [35] on the farm over the prior two years Requirement: < 9 lethal incidents [36], with no more than two of the incidents being marine mammals Applicability: All	a. Maintain log of lethal incidents (see 2.5.4a) for a minimum of two years. For first audit, > 6 months of data are required. b. Calculate the total number of lethal incidents and the number of incidents involving marine mammals during the previous two year period. c. Send ASC the farm's data for all lethal incidents [35] of any species other than the salmon being farmed (e.g. lethal incidents involving predators such as birds or marine mammals). Data must be sent to ASC on an ongoing basis (i.e. at least once per year and for each production cycle). d. Others, please describe	The site has not yet been in operation for 2 years, no lethal incidents since the beginning of the production cycle (Sept 2015) The site has not yet been in operation for 2 years, no lethal incidents since the beginning of the production cycle (Sept 2015) The site has not yet been in operation for 2 years, no lethal incidents since the beginning of the production cycle (Sept 2015)	Compliant	
2.5.7	Indicator: In the event of a lethal incident, evidence that an assessment of the risk of lethal incident(s) has been undertaken and demonstration of concrete steps taken by the farm to reduce the risk of future incidences Requirement: Yes Applicability: All	a. Keep records showing that the farm undertakes an assessment of risk following each lethal incident and how those risk assessments are used to identify concrete steps the farm takes to reduce the risk of future incidents. b. Provide documentary evidence that the farm implements those steps identified in 2.5.7a to reduce the risk of future lethal incidents. c. Others, please describe	N/A as no lethal incidents recorded. N/A as no lethal incidents recorded.	N/A	

PRINCIPLE 3: PROTECT THE HEALTH AND GENETIC INTEGRITY OF WILD POPULATIONS
Criterion 3.1 Introduced or amplified parasites and pathogens [38,39]

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
3.1.1	<p>Indicator: Participation in an Area-Based Management (ABM) scheme for managing disease and resistance to treatments that includes coordination of stocking, fallowing, therapeutic treatments and information-sharing. Detailed requirements are in Appendix II-1.</p> <p>Requirement: Yes</p> <p>Applicability: All except farms that release no water as noted in [38]</p>	a. Keep record of farm's participation in an ABM scheme.	MH Canada wishes to apply the VR (145) submitted by SAI Global relating to the participation in an ABM as the neighbouring farms are run by MHCanada (Duncan and Doyle)so fall under ther operational control.and are covered by DFO pacific management area 12 and restrictions therein applied. MH states no other sites in the production area.	Compliant	
		b. Submit to the CAB a description of how the ABM (3.1.1a) coordinates management of disease and resistance to treatments, including: - coordination of stocking; - fallowing; - therapeutic treatments; and - information sharing.	See Above		
		c. Provide the CAB access to documentation which is sufficient for the auditor to evaluate the ABM's compliance with all requirements in Appendix II-1, including definition of area, minimum % participation in the scheme, components, and coordination requirements.	See Above, there is evidence that the company is moving towards an ABM through emails confirming meeting for the setting up of an ABM and discussion of future stocking plans.		
		d. Submit dates of fallowing period(s) as per Appendix VI to ASC at least once per year.	First production cycle. Initial Stocking September 29th 2015		
		e. Others, please describe			
3.1.2	<p>Indicator: A demonstrated commitment [40] to collaborate with NGOs, academics and governments on areas of mutually agreed research to measure possible impacts on wild stocks</p> <p>Requirement: Yes</p> <p>Applicability: All except farms that</p>	a. Retain records to show how the farm and/or its operating company has communicated with external groups (NGOs, academics, governments) to agree on and collaborate towards areas of research to measure impacts on wild stocks, including records of requests for research support and collaboration and responses to those requests.	- Advancing the science and management of cumulative impacts~also part funded by MH Canada resulted in a report "Cumulative effects in Marine Ecosystems" also Sea lice research work carried out at the Vancouver Aquarium. Collaboration with UPEI, University of Toronto, DFO research; Broughton Archipelago Management Project published the 2015 paper "Spatial patterns of sea lice infection among wild and captive salmon in western Canada", Other collaboration includes third –party professionals and Tlatasikwala First Nation. Nowak, Trevor and Derek LeBoeuf, 2015. Sea lice monitoring study in Goletas Channel and Queen Charlotte Strait, BC. Year 4 – 2015. Pacificus Biological Services Ltd.	Compliant	
		b. Provide non-financial support to research activities in 3.1.2a by either: - providing researchers with access to farm-level data; - granting researchers direct access to farm sites; or - facilitating research activities in some equivalent way.	Project (April 2013 - April 2014 - Advancing the science and management of cumulative impacts) funded by MH Canada resulted in a report "Cumulative effects in Marine Ecosystems" also Sea lice research work carried out at the Vancouver Aquarium. See also project detail noted above.		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
	release no water as noted in [38]	<p>c. When the farm and/or its operating company denies a request to collaborate on a research project, ensure that there is a written justification for rejecting the proposal.</p> <p>d. Maintain records from research collaborations (e.g. communications with researchers) to show that the farm has supported the research activities identified in 3.1.2a.</p> <p>e. Others, please describe</p>	<p>1. Write down all audit evidence for each compliance criterion (CC). Audit evidence (including evidence of conformity and nonconformity) should be recorded so that the audit can be repeated by a different audit team.</p> <p>2. Replace explanatory text in the 'Audit Evidence' column as appropriate.</p> <p>3. If you see any Compliance Criteria which is not listed below, please describe in the blue cells below.</p> <p>No collaboration on projects relating to issues of wild stocks or Salmon farming in general are stated to have been rejected, no evidence to suggest otherwise.</p> <p>Confirmed as identified in 3.1.2 c</p>		
3.1.3	<p>Indicator: Establishment and annual review of a maximum sea lice load for the entire ABM and for the individual farm as outlined in Appendix II-2</p> <p>Requirement: Yes</p> <p>Applicability: All except farms that release no water as noted in [38]</p>	<p>a. Keep records to show that a maximum sea lice load has been set for: - the entire ABM; and - the individual farm.</p> <p>b. Maintain evidence that the established maximum sea lice load (3.1.3a) is reviewed annually as outlined in Appendix II-2, incorporating feedback from the monitoring of wild salmon where applicable (See 3.1.6).</p> <p>c. Provide the CAB access to documentation which is sufficient for the auditor to evaluate whether the ABM has set (3.1.3a) and annually reviewed (3.1.3.b) maximum sea lice load in compliance with requirements in Appendix II-2.</p> <p>d. Submit the maximum sea lice load for the ABM to ASC as per Appendix VI at least once per year.</p> <p>e. Others, please describe</p>	<p>Lice loading for BC farms is hard to predict going forward due to the high numbers of wild fish in the locality at various times of year and consequently it is also difficult to estimate when the maximum load for the farm is likely to be. The farm is able to produce site lice load calculations from their Aquafarmer data but as the ABM for the farm is not yet in place a minor NC is raised as no collective lice load for the 'ABM' can be calculated</p> <p>Company aligns lice load review with DFO (current level of 3 has been in place since DFO took over the regulation in 2011) who enforce the current levels in relation to treatment timing.</p> <p>see 3.1.3a above</p> <p>see 3.1.3a above</p>	Minor	<p>The farm has a good individual data set as do all MH Farms in the area being considered. Lice Load information will be collated for the farming area and a collective lice load will be calculated.</p>
		<p>a. Prepare an annual schedule for testing sea lice that identifies timeframes of routine testing frequency (at a minimum, monthly) and for high-frequency testing (weekly) due to sensitive periods for wild salmonids (e.g. during and immediately prior to outmigration of juveniles).</p> <p>b. Maintain records of results of on-farm testing for sea lice. If farm deviates from schedule due to weather [41] maintain documentation of event and rationale.</p>	<p>Monitoring generally carried out by farm on a twice monthly basis as evidenced by Aquafarmer records and confirmed by farm checks on paper records but increased to weekly during the sensitive period as defined by ASC (government requirement for sensitive period is twice monthly).</p> <p>Lice count records provided, signed off by staff involved, training of staff during a 6 month probationary period, but may be signed off as competent prior to the completion of this period.</p>		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
3.1.4	<p>Indicator: Frequent [41] on-farm testing for sea lice, with test results made easily publicly available [42] within seven days of testing</p> <p>Requirement: Yes</p> <p>Applicability: All except farms that release no water as noted in [38]</p>	c. Document the methodology used for testing sea lice ('testing' includes both counting and identifying sea lice). The method must follow national or international norms, follows accepted minimum sample size, use random sampling, and record the species and life-stage of the sea lice. If farm uses a closed production system and would like to use an alternate method (i.e. video), farm shall provide the CAB with details on the method and efficacy of the method.	SOP SW 822 provided and modelled on requirements of BC Government determining the requirements stated.	Compliant	
		d. Make the testing results from 3.1.4b easily publicly available (e.g. posted to the company's website) within seven days of testing. If requested, provide stakeholders access to hardcopies of test results.	15 June monitoring results provided. 1.63 motile Leps, 0 motile Caligus and 0 attached chalimus per fish Records for evidence that lice are counted weekly between March-June provided total of 36 samplings covering the required period. Observed lice count on site consistent with reports		
		e. Keep records of when and where test results were made public.	Confirmed as located on the MH ASC Dashboard : http://www.marineharvest.ca/globalassets/canada/pdf/asc-dashboard-2016/bull-june-15.pdf		
		f. Submit test results to ASC (Appendix VI) at least once per year.	Results confirmed as submitted in the ASC Transparency checklist previously referenced.		
		g. Others, please describe			
	<p>Indicator: In areas with wild salmonids [43], evidence of data [44] and the farm's understanding of that data, around salmonid migration routes, migration timing and stock productivity in major waterways</p>	a. Identify all salmonid species that naturally occur within 75 km of the farm through literature search or by consulting with a reputable authority. If the farm is not in an area with wild salmonids, then 3.1.5b and c do not apply.	Majority are stated to be Chum and Pink with some Sockeye, Chinook and Coho, information from PACIFICUS biological services commissioned by MHC and First Nations Tlatlasikwala. Last samples June 2nd 2016. Monitoring of the Goletas Channel and Queen Charlotte strait - Year 4 2015 report provided. Subcontracted company is licenced to carry out these studies: DFO licence XR 5 2016 (expiry 31st July 2016) Refs: 'Preliminary 2016 Salmon Outlook' provided. Ask for clarification of relevant outlook units for the farm. Appears to be Area 12 according to PFRCC 2009. 'Status of Pacific Salmon Resources in Southern BC and the Fraser River Basin' 2009. Confirm location of farm in relation to Southern BC and Fraser River Basin		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
3.1.5	within 50 kilometers of the farm Requirement: Yes Applicability: All farms operating in areas with wild salmonids except farms that release no water as noted in [38]	b. For species listed in 3.1.5a, compile best available information on migration routes, migration timing (range of months for juvenile outmigration and returning salmon), life history timing for coastal resident salmonids, and stock productivity over time in major waterways within 50 km of the farm.	Migration routes relevant to farm within the documents supplied by the DFO covering 84 outlook sites. Identification of sensitive period confirmed as government determined and relates to Pink and Chum salmon as these are the smallest and determined to be most susceptible. The defined sensitive period is designed to overlap different species. ref Int Fish Man Plan; S Coast Salmon Report Labelle and Preliminary 2016	Compliant	
		c. From data in 3.1.5b, identify any sensitive periods for wild salmonids (e.g. periods of outmigration of juveniles) within 50 km of the farm.	Majority are Chum and Pink with some Sockeye, Chinook and Coho Sensitive period determined by the Local Government and adopted by MHC.		
		-	Site staff interviewed were aware that the sensitive period is "now", some variance on end date of sensitive period amongst junior staff however senior site staff demonstrated more detailed knowledge.		
		e. Others, please describe			
3.1.6	Indicator: In areas of wild salmonids, monitoring of sea lice levels on wild out-migrating salmon juveniles or on coastal sea trout or Arctic char, with results made publicly available. See requirements in Appendix III-1. Requirement: Yes Applicability: All farms operating in areas with wild salmonids except farms that release no water as noted in [38]	a. Inform the CAB if the farm operates in an area of wild salmonids. If not, then Indicator 3.1.6 does not apply.	See 3.1.5	Compliant	
		b. Keep records to show the farm participates in monitoring of sea lice on wild salmonids.	Sampling and reporting from Sea Lice Monitoring Study in Goletas Channel and Queen Charlotte Strait. Location of sampling confirmed as five locations around the farming area. Data is from 2015 report Sampling conducted by Pacificus Biological Services Ltd for Port Hardy area, link to http://www.marineharvest.ca/globalassets/canada/pdf/asc-dashboard-2015/sea-lice-study--goletas-channel-2015_final.pdf		
		c. Provide the CAB access to documentation which is sufficient for the auditor to evaluate whether the methodology used for monitoring of sea lice on wild salmonids is in compliance with the requirements in Appendix III-1.	Methodology is covered within the Pacificus report, MHC carries out no sampling of wild salmonids.		
		d. Make the results from 3.1.6b easily publicly available (e.g. posted to the company's website) within eight weeks of completion of monitoring.	Report dated August 2015, sampling carried out in June 2015. The 2016 sampling has been carried out by Pacificus Biological Services Ltd with results awaited.		
		e. Submit to ASC the results from monitoring of sea lice levels on wild salmonids as per Appendix VI.	See 3.1.3d		
		f. Others, please describe			

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
3.1.7	<p>Indicator: In areas of wild salmonids, maximum on-farm lice levels during sensitive periods for wild fish [45]. See detailed requirements in Appendix II, subsection 2.</p> <p>Requirement: 0.1 mature female lice per farmed fish</p> <p>Applicability: All farms operating in areas with wild salmonids except farms that release no water as noted in [38]</p>	a. Inform the CAB if the farm operates in an area of wild salmonids. If not, then Indicator 3.1.7 does not apply.	See 3.1.5a	Compliant	
		b. Establish the sensitive periods [45] of wild salmonids in the area where the farm operates. Sensitive periods for migrating salmonids is during juvenile outmigration and approximately one month before.	DFO determined dates of 1st March to 30th June used.		
		c. Maintain detailed records of monitoring on-farm lice levels (see 3.1.4) during sensitive periods as per Appendix II-2.	VR 141 Cited for this criterion; VR 141 accepts the DFO control strategy for lice, appended paper supports difference between BC and other.		
		d. Provide the CAB with evidence there is a 'feedback loop' between the targets for on-farm lice levels and the results of monitoring of lice levels on wild salmonids (Appendix II-2).	Harvest patterns are on occasion adjusted / brought forward as appropriate to reduce the farm's potential lice load during sensitive periods		
		e. Others, please describe			
Criterion 3.2 Introduction of non-native species					
3.2.1	<p>Indicator: If a non-native species is being produced, demonstration that the species was widely commercially produced in the area by the date of publication of the SAD standard</p> <p>Requirement: Yes [47]</p> <p>Applicability: All farms except as noted in [47]</p>	a. Inform the CAB if the farm produces a non-native species. If not, then Indicator 3.2.1 does not apply.	M H Canada farm Atlantic Salmon <i>Salmo salar</i> on this site. Atlantic Salmon are not native to Pacific. Atlantic Salmon have been farmed commercially in British Columbia since 1980s (Ref Fisheries and Oceans Canada, 'Farming the seas-A Timeline)	Compliant	
		b. Provide documentary evidence that the non-native species was widely commercially produced in the area before publication of the SAD Standard (i.e. before June 13, 2012).	Atlantic Salmon have been commercially farmed since the 1980's, more than 70 000 tonnes produced in British Columbia in 2013. Ref http://www.dfo-mpo.gc.ca/aquaculture/sector-secteur/species-especes/salmon-saumon-eng.htm		
		c. If the farm cannot provide evidence for 3.2.1b, provide documentary evidence that the farm uses only 100% sterile fish that includes details on accuracy of sterility effectiveness.	N/A evidence provided as stated above.		
		d. If the farm cannot provide evidence for 3.2.1b or 3.2.1c, provide documented evidence that the production system is closed to the natural environment and for each of the following: 1) non-native species are separated from wild fish by effective physical barriers that are in place and well maintained; 2) barriers ensure there are no escapes of reared fish specimens that might survive and subsequently reproduce [47]; and 3) barriers ensure there are no escapes of biological material [47] that might survive and subsequently reproduce (e.g. UV or other effective treatment of any effluent water exiting the	N/A evidence provided as stated above.		
		-	Compliance confirmed.		
		f. Others, please describe			
		a. Inform the ASC of the species in production (Appendix VI).	Atlantic Salmon Confirmed in Audit Declaration		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence 1. Write down all audit evidence for each compliance criterion (CC). Audit evidence (including evidence of conformity and nonconformity) should be recorded so that the audit can be repeated by a different audit team. 2. Replace explanatory text in the 'Audit Evidence' column as appropriate. 3. If you see any Compliance Criteria which is not listed below, please describe in the blue cells below .	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
3.2.2	Indicator: If a non-native species is being produced, evidence of scientific research [48] completed within the past five years that investigates the risk of establishment of the species within the farm's jurisdiction and these results submitted to ASC for review [49] Requirement: Yes, within five years of publication of the SAD standard [50,51] Applicability: All	b. Inform the CAB if the farm produces a non-native species. If not, then Indicator 3.2.2 does not apply.	Yes. See 3.2.1a. Observation. By June 2017, the farms will have to provide evidence of scientific research completed within the past five years that investigates the risk of establishment of the species within the farm's jurisdiction.	Compliant	
		c. If yes to 3.2.2b, provide evidence of scientific research completed within the past five years that investigates the risk of establishment of the species within the farm's jurisdiction. Alternatively, the farm may request an exemption to 3.2.2c (see below).	N/A to June 2017		
		d. If applicable, submit to the CAB a request for exemption that shows how the farm meets all three conditions specified in instruction box above.	N/A to June 2017		
		e. Submit evidence from 3.2.2c to ASC for review.	N/A to June 2017		
		f. Others, please describe			
3.2.3	Indicator: Use of non-native species for sea lice control for on-farm management purposes Requirement: None Applicability: All	a. Inform the CAB if the farm uses fish (e.g. cleaner fish or wrasse) for the control of sea lice.	N/A Cleaner fish not in use	N/A	
		b. Maintain records (e.g. invoices) to show the species name and origin of all fish used by the farm for purposes of sea lice	N/A Cleaner fish not in use		
		c. Collect documentary evidence or first hand accounts as evidence that the species used is not non-native to the region.	N/A Cleaner fish not in use		
		d. Others, please describe			
Criterion 3.3 Introduction of transgenic species					
3.3.1	Indicator: Use of transgenic [53] salmon by the farm Requirement: None Applicability: All	a. Prepare a declaration stating that the farm does not use transgenic salmon.	Declaration provided (23 November 2015) Marine Harvest does not produce, farm or sell transgenic salmon	Compliant	
		b. Maintain records for the origin of all cultured stocks including the supplier name, address and contact person(s) for stock purchases.	MH Canada has their own Broodstock and egg production		
		c. Ensure purchase documents confirm that the culture stock is not transgenic.	N/A		
		d. Others, please describe			
Criterion 3.4 Escapes [55]					
		a. Maintain monitoring records of all incidences of confirmed or suspected escapes, specifying date, cause, and estimated number of escapees.	Manager states no escapes suspected, records and reporting procedures to federal government support this.		
		b. Aggregate cumulative escapes in the most recent production cycle.	N/A See Above		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
3.4.1	Indicator: Maximum number of escapees [56] in the most recent production cycle Requirement: 300 [57] Applicability: All farms except as noted in [57]	c. Maintain the monitoring records described in 3.4.1a for at least 10 years beginning with the production cycle for which farm is first applying for certification (necessary for farms to be eligible to apply for the exception noted in [57]).	N/A See Above	Compliant	
		d. If an escape episode occurs (i.e. an incident where > 300 fish escaped), the farm may request a rare exception to the Standard [57]. Requests must provide a full account of the episode and must document how the farm could not have predicted the events that caused the escape episode.	N/A See Above		
		e. Submit escape monitoring dataset to ASC as per Appendix VI on an ongoing basis (i.e. at least once per year and for each production cycle).	N/A See Above		
		f. Others, please describe			
3.4.2	Indicator: Accuracy [58] of the counting technology or counting method used for calculating stocking and harvest numbers Requirement: ≥ 98% Applicability: All	a. Maintain records of accuracy of the counting technology used by the farm at times of stocking and harvest. Records include copies of spec sheets for counting machines and common estimates of error for hand-counts.	Counting of incoming stock by Hatchery of origin and wellboats, Harvest reconciliation for end counts. Counter accuracy from records works out at -0.48% for 2015, on the only occasions when the individual values on delivery were outside the 2% anticipated accuracy was recorded as being due to poor weather conditions.	Compliant	
		b. If counting takes place off site (e.g. pre-smolt vaccination count), obtain and maintain documents from the supplier showing the accuracy of the counting method used (as above).	Document FW 269 covers counting (Smolt Inventory control) and specifies the < or = 2% anticipated counter accuracy, this is supported by supplier documentation. Aquascan counters were mostly used on the well boats with hatcheries using Vaki counters.		
		c. During audits, arrange for the auditor to witness calibration of counting machines (if used by the farm).	Counting of incoming stock by Hatchery of origin and wellboats, Harvest reconciliation for end counts.		
		-	Document FW 269 covers counting (Smolt Inventory control) and specifies the < or = 2% anticipated counter accuracy, this is supported by supplier documentation. Aquascan counters were mostly used on the well boats with hatcheries using Vaki counters.		
		e. Submit counting technology accuracy to ASC as per Appendix VI on an ongoing basis (i.e. at least once per year and for each production cycle).	Confirmed as listed in ASC Transparency checklist		
		f. Others, please describe			

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
3.4.3	<p>Indicator: Estimated unexplained loss [59] of farmed salmon is made publicly available</p> <p>Requirement: Yes</p> <p>Applicability: All</p>	a. Maintain detailed records for mortalities, stocking count, harvest count, and escapes (as per 3.4.1).	Mortality Records on Aquafarmer provided, removal frequency of 5- 7 times per week noted, detail included for cause of mortality.	Compliant	
		b. Calculate the estimated unexplained loss as described in the instructions (above) for the most recent full production cycle. For first audit, farm must demonstrate understanding of calculation and the requirement to disclose EUL after harvest of the current cycle.	N/A as first Cycle and assessment audit for Bull Harbour to date, will be reviewed at surveillance.		
		c. Make the results from 3.4.3b available publicly. Keep records of when and where results were made public (e.g. date posted to a company website) for all production cycles.	N/A as first Cycle and assessment audit for Bull Harbour to date, will be reviewed at surveillance.		
		d. Submit estimated unexplained loss to ASC as per Appendix VI for each production cycle.	N/A as first Cycle and assessment audit for Bull Harbour to date, will be reviewed at surveillance.		
		-	N/A as first Cycle and assessment audit for Bull Harbour to date, will be reviewed at surveillance.		
		f. Others, please describe			
3.4.4	<p>Indicator: Evidence of escape prevention planning and related employee training, including: net strength testing; appropriate net mesh size; net traceability; system robustness; predator management; record keeping and reporting of risk events (e.g., holes, infrastructure issues, handling errors, reporting and follow up of escape events); and</p>	a. Prepare an Escape Prevention Plan and submit it to the CAB before the first audit. This plan may be part of a more comprehensive farm planning document as long as it addresses all required elements of Indicator 3.4.4.	Escape Prevention and Response Plan provided (Document# SW951, 9 December 2014) "escape kit" present to rapidly cater for any discovered issues, risk assessments provided. Training records for site staff provided with quarterly drills for familiarisation covering various events including fish escape, site staff of 7 on site in two shifts all trained e.g. Farm Technician May 16th 2016 with quiz also two plus manager have completed drills(Document# SW951, 9 December 2014)	Compliant	
		b. If the farm operates an open (net pen) system, ensure the plan (3.4.4a) covers the following areas: - net strength testing; - appropriate net mesh size; - net traceability; - system robustness; - predator management; - record keeping; - reporting risk events (e.g. holes, infrastructure issues, handling errors); - planning of staff training to cover all of the above areas; and - planning of staff training on escape prevention and counting technologies.	Staff training in Escape controls and drills confirmed. "escape kit" present to rapidly cater for any discovered issues, risk assessments provided. Net servicing carried out by Badinotti Net Services including disinfection to 65c for 1 hour. This is in conflict with the MH Canada Net Loft Biosecurity Procedure (SW 823) which states 70c for 10 minutes as a minimum temperature though it is accepted that in microbiological terms the net result will be the same or more effective. Site net log for confirmation of net location and service status.		

	Compliance Criteria (Use as guidance for audit only)	Audit evidence 1. Write down all audit evidence for each compliance criterion (CC). Audit evidence (including evidence of conformity and nonconformity) should be recorded so that the audit can be repeated by a different audit team. 2. Replace explanatory text in the 'Audit Evidence' column as appropriate. 3. If you see any Compliance Criteria which is not listed below, please describe in the blue cells below .	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
Follow up on escape events), and worker training on escape prevention and counting technologies Requirement: Yes Applicability: All	c. If the farm operates a closed system, ensure the plan (3.4.4a) covers the following areas: - system robustness; - predator management; - record keeping; - reporting risk events (e.g. holes, infrastructure issues, handling errors); - planning of staff training to cover all of the above areas; and - planning of staff training on escape prevention and counting technologies. d. Maintain records as specified in the plan. e. Train staff on escape prevention planning as per the farm's plan. - g. Others, please describe	N/A Seawater farm site N/A Seawater farm site N/A Seawater farm site N/A Seawater farm site		

PRINCIPLE 4: USE RESOURCES IN AN ENVIRONMENTALLY EFFICIENT AND RESPONSIBLE MANNER

Criterion 4.1 Traceability of raw materials in feed

4.1.1 Indicator: Evidence of traceability, demonstrated by the feed producer, of feed ingredients that make up more than 1% of the feed [62]. Requirement: Yes Applicability: All	a. Maintain detailed records of all feed suppliers and purchases including contact information and purchase and delivery b. Inform each feed supplier in writing of ASC requirements pertaining to production of salmon feeds and send them a copy of the ASC Salmon Standard. c. For each feed producer used by the farm, confirm that an audit of the producer was recently done by an audit firm or CAB against an ASC-acknowledged certification scheme. Obtain a copy of the most recent audit report for each feed producer. d. For each feed producer, determine whether the farm will use method #1 or method #2 (see Instructions above) to show compliance of feed producers. Inform the CAB in writing.	Skretting Canada are the sole supplier, records of supply and usage covered by invoicing and site Aquafarmer records. Skretting Canada previously informed of the requirement when previous farms put forward for certification. Skretting Canada audit report for BAP provided (Certificate 1202 expiry 22nd October 2016) Method # 2 (mass balance) selected for compliance.	Compliant	
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		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
		e. Obtain declaration from feed supplier(s) stating that the company can assure traceability of all feed ingredients that make up more than 1% of the feed to a level of detail required by the ASC Salmon Standard [62].	Feed label declarations and recipe information confirms traceability requirement backed up by traceability and systems management components of audits carried out.		
		-	Confirmed within BAP feed mill audit. (traceability from feed suppliers)		
		g. Others, please describe			
Criterion 4.2 Use of wild fish for feed [63]					
4.2.1	<p>Indicator: Fishmeal Forage Fish Dependency Ratio (FFDRm) for grow-out (calculated using formulas in Appendix IV- 1)</p> <p>Requirement: < 1.35</p> <p>Applicability: All</p>	<p>a. Maintain a detailed inventory of the feed used including:</p> <ul style="list-style-type: none"> - Quantities used of each formulation (kg); - Percentage of fishmeal in each formulation used; - Source (fishery) of fishmeal in each formulation used; - Percentage of fishmeal in each formulation derived from trimmings; and - Supporting documentation and signed declaration from feed supplier. 	<p>Feed batch numbers are logged on PC, Aquafarmer records track usage by pen. Feed bag labels display basic ingredient information. Skretting has supplied lists of species used in fish meal and fish oil production including the species used in by-products by email June 27th 2016. Species listed are European Sprat, Lesser Sand eel, Norway pout (all North Sea origin). Gulf Menhaden from the Gulf of Mexico.</p>	Compliant	
		b. For FFDRm calculation, exclude fishmeal derived from rendering of seafood by-products (e.g. the "trimmings" from a human consumption fishery).	Statement April 17th 2014 from Skretting states exclusion of meal and oil from trimmings.		
		c. Calculate eFCR using formula in Appendix IV-1 (use this calculation also in 4.2.2 option #1).	First Production cycle so no submitted eFCR value, level of margin of compliance for other sites and similarity of feed types used suggest site will be compliant going forward.		
		d. Calculate FFDRm using formulas in Appendix IV-1.	Calculations for completed cycle not available as first cycle, FCR values for site to date give values below the 0.6 value calculated for Goat Cove.		
		e. Submit FFDRm to ASC as per Appendix VI for each production cycle.	Will be submitted on completion of cycle.		
		f. Others, please describe			
	<p>Indicator: Fish Oil Forage Fish Dependency Ratio (FFDRo) for grow-out (calculated using formulas in Appendix IV- 1),</p> <p>OR</p>	a. Maintain a detailed inventory of the feed used as specified in 4.2.1a.	Feed records provided in Aquafarmer and through invoicing		
		b. For FFDRo and EPA+DHA calculations (either option #1 or option #2), exclude fish oil derived from rendering of seafood by-products (e.g. the "trimmings" from a human consumption fishery).	Trimming values provided by Skretting and confirmed as being excluded from the calculation.		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
4.2.2	Maximum amount of EPA and DHA from direct marine sources [64] (calculated according to Appendix IV-2) Requirement: FFDRo < 2.95 or (EPA + DHA) < 30 g/kg feed Applicability: All	c. Inform the CAB whether the farm chose option #1 or option #2 to demonstrate compliance with the requirements of the Standard.	MH Canada opt to use option #1	Compliant	
		d. For option #1, calculate FFDRo using formulas in Appendix IV-1 and using the eFCR calculated under 4.2.1c.	No full cycle complete to date, calculations using part cycle data would indicate compliance will be achieved for the completed cycle.		
		e. For option #2, calculate amount of EPA + DHA using formulas in Appendix IV-2.	N/A as farm elected to use FFDRo results.		
		f. Submit FFDRo or EPA & DHA to ASC as per Appendix VI for each production cycle.	N/A as farm elected to use FFDRo results.		
		g. Others, please describe			
Criterion 4.3 Source of marine raw materials					
4.3.1	Indicator: Timeframe for all fishmeal and fish oil used in feed to come from fisheries [65] certified under a scheme that is an ISEAL member [66] and has guidelines that specifically promote responsible environmental management of small pelagic fisheries Requirement: < 5 years after the date of publication [67] of the SAD standards (i.e. full compliance by June 13, 2017) Applicability: All	a. Prepare a policy stating the company's support of efforts to shift feed manufacturers purchases of fishmeal and fish oil to fisheries certified under a scheme that is an ISEAL member and has guidelines that specifically promote responsible environmental management of small pelagic fisheries.	Marine Harvest Corporate Policy on sustainable salmon feed (8th November 2013) covers the requirement.	Compliant	
		b. Prepare a letter stating the farm's intent to source feed containing fishmeal and fish oil originating from fisheries certified under the type of certification scheme noted in 4.3.1a	Above Policy document covers the requirement.		
		c. Starting on or before June 13, 2017, use feed inventory and feed supplier declarations in 4.2.1a to develop a list of the origin of all fish products used as feed ingredients.	N/A until June 2017 audits		
		d. Starting on or before June 13, 2017, provide evidence that fishmeal and fish oil used in feed come from fisheries [65] certified under a scheme that is an ISEAL member [66] and has guidelines that specifically promote responsible environmental management of small pelagic fisheries.	N/A until June 2017 audits		
		e. Others, please describe			
		a. Record FishSource score for each species from which fishmeal or fish oil was derived and used as a feed ingredient (all species listed in 4.2.1a).	Fish Source scores have been provided covering the mass balance derived quantities of fish meal and fish oil required to produce ASC approved feed. All submitted scores were in compliance with the required criteria		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
4.3.2	<p>Indicator: Prior to achieving 4.3.1, the FishSource score [68] for the fishery(ies) from which all marine raw material in feed is derived</p> <p>Requirement: All individual scores \geq 6, and biomass score \geq 8</p> <p>Applicability: All, until June 13, 2017</p>	b. Confirm that each individual score \geq 6 and the biomass score is \geq 8.	May 2014 Skretting corporate document dated May 2014 covers the requirement, in addition a cross check on listed species (e.g. European Sprat-origin North Sea scoring 10 for Biomass as listed and Menhaden - origin Gulf of Mexico Scoring 8.8 for biomass as listed, both with all other scores above the threshold of 6 as required). It is noted that the scores listed dated from 2014 and it was unclear at time of audit if these were the values at time of purchase. More up-to-date information still shows the species concerned to be compliant.	Compliant	
		c. If the species is not on the website it means that a FishSource assessment is not available. Client can then take one or both of the following actions: <ol style="list-style-type: none"> 1. Contact FishSource via Sustainable Fisheries Partnerships to identify the species as a priority for assessment. 2. Contract a qualified independent third party to conduct the assessment using the FishSource methodology and provide the assessment and details on the third party qualifications to the CAB for review. 	No species submitted to cover the mass balance requirement were either not listed or marked as not assessed		
		-	No submitted species listed were seen to be unscored or marked N/A		
		e. Others, please describe			
4.3.3	<p>Indicator: Prior to achieving 4.3.1, demonstration of third-party verified chain of custody and traceability for the batches of fishmeal and fish oil which are in compliance with 4.3.2.</p> <p>Requirement: Yes</p> <p>Applicability: All, until June 13, 2017</p>	a. Obtain from the feed supplier documentary evidence that the origin of all fishmeal and fish oil used in the feed is traceable via a third-party verified chain of custody or traceability program.	Covered by Marine Harvest Corporate policy on Sustainable Salmon Feed requirements (13th April 2015). Confirmed by traceability component of BAP certification BAP 1202 expiry 22nd October 2014	Compliant	
		b. Ensure evidence covers all the species used (as consistent with 4.3.2a, 4.2.1a, and 4.2.2a).	Species used for ASC feed production via mass balance calculation confirmed as covered.		
		c. Others, please describe			

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
4.3.4	<p>Indicator: Feed containing fishmeal and/or fish oil originating from by-products [69] or trimmings from IUU [70] catch or from fish species that are categorized as vulnerable, endangered or critically endangered, according to the IUCN Red List of Threatened Species [71]</p> <p>Requirement: None [72]</p> <p>Applicability: All except as noted in [72]</p>	a. Compile and maintain, consistent with 4.2.1a and 4.2.2a, a list of the fishery of origin for all fishmeal and fish oil originating from by-products and trimmings.	Origin of all trimmings-related fish meal and oils stated to be retained at time of purchase.	Compliant	
		b. Obtain a declaration from the feed supplier stating that no fishmeal or fish oil originating from IUU catch was used to produce the feed.	Skretting declaration confirms that no fish meal or fish oil used originates from IUU caught fish. Covered by Marine Harvest Corporate policy on Sustainable Salmon Feed requirements (13th April 2015).		
		c. Obtain from the feed supplier declaration that the meal or oil did not originate from a species categorized as vulnerable, endangered or critically endangered, according to the IUCN Red List of Threatened Species [71] and explaining how they are able to demonstrate this (i.e. through other certification scheme or through their independent audit).	Skretting declaration confirms that no fish meal or fish oil used originates from fish species that are categorized as vulnerable, endangered or critically endangered, according to the IUCN Red List of Threatened Species		
		d. If meal or oil originated from a species listed as “vulnerable” by IUCN, obtain documentary evidence to support the exception as outlined in [72].	N/A see above.		
		e. Others, please describe			
Criterion 4.4 Source of non-marine raw materials in feed					
4.4.1	<p>Indicator: Presence and evidence of a responsible sourcing policy for the feed manufacturer for feed ingredients that comply with recognized crop moratoriums [75] and local laws [76]</p> <p>Requirement: Yes</p> <p>Applicability: All</p>	a. Compile and maintain a list of all feed suppliers with contact information. (See also 4.1.1a)	Only Skretting compound feeds used by MH Canada. Contact information provided.	Compliant	
		b. Obtain from each feed manufacturer a copy of the manufacturer’s responsible sourcing policy for feed ingredients showing how the company complies with recognized crop moratoriums and local laws.	Skretting supplier declarations cover relevant sourcing requirements		
		c. Confirm that third party audits of feed suppliers (4.1.1c) show evidence that supplier’s responsible sourcing policies are implemented.	Covered by BAP audit, certification until 22nd October 2016		
		d. Others, please describe			

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
4.4.2	<p>Indicator: Percentage of soya or soya-derived ingredients in the feed that are certified by the Roundtable for Responsible Soy (RTRS) or equivalent [77]</p> <p>Requirement: 100%, within five years of the publication [78] of the SAD standards</p> <p>Applicability: All, after June 13, 2017</p>	a. Prepare a policy stating the company's support of efforts to shift feed manufacturers' purchases of soya to soya certified under the Roundtable for Responsible Soy (RTRS) or equivalent.	Corporate policy statements restrict any use of soya to RTRS or equivalent (e.g. Proterra) however Skretting state they do not use soya in their compound salmon feed products.	Compliant	
		b. Prepare a letter stating the farm's intent to source feed containing soya certified under the RTRS (or equivalent)	Corporate policy statements restrict any use of soya to RTRS or equivalent (e.g. Proterra) however Skretting state they do not use soya in their compound salmon feed products.		
		c. Notify feed suppliers of the farm's intent (4.4.2b).	Skretting state they do not use soya in their compound salmon feed products.		
		d. Obtain and maintain declaration from feed supplier(s) detailing the origin of soya in the feed.	Skretting state they do not use soya in their compound salmon feed products.		
		e. Starting on or before June 13, 2017, provide evidence that soya used in feed is certified by the Roundtable for Responsible Soy (RTRS) or equivalent [77]	N/A until June 2017		
		f. Others, please describe			
4.4.3	<p>Indicator: Evidence of disclosure to the buyer [79] of the salmon of inclusion of transgenic [80] plant raw material, or raw materials derived from transgenic plants, in the feed</p> <p>Requirement: Yes, for each individual raw material containing > 1% transgenic content [81]</p> <p>Applicability: All</p>	a. Obtain from feed supplier(s) a declaration detailing the content of soya and other plant raw materials in feed and whether it is transgenic.	Email declarations received from Skretting stating separately that a) no soya is used in the feed supplied and b) Canola oil and Corn Gluten are used and these products may contain >1% transgenic content.	Compliant	
		b. Disclose to the buyer(s) a list of any transgenic plant raw material in the feed and maintain documentary evidence of this disclosure. For first audits, farm records of disclosures must cover > 6 months.	Canola oil and Corn Gluten are stated to be used and these products may contain >1% transgenic content.		
		c. Inform ASC whether feed contains transgenic ingredients (yes or no) as per Appendix VI for each production cycle.	Confirmed as included in the submitted ASC transparency checklist.		
		d. Others, please describe			
Criterion 4.5 Non-biological waste from production					
		a. Prepare a policy stating the farm's commitment to proper and responsible treatment of non-biological waste from production. It must explain how the farm's policy is consistent with best practice in the area of operation.	Materials storage, handling and waste disposal plan in plan SW 963 (last review June 2015) covers required elements.		
		b. Prepare a declaration that the farm does not dump non-biological waste into the ocean.	Included within the above SW 963 Document		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
4.5.1	Indicator: Presence and evidence of a functioning policy for proper and responsible [83] treatment of non-biological waste from production (e.g., disposal and recycling) Requirement: Yes Applicability: All	c. Provide a description of the most common production waste materials and how the farm ensures these waste materials are properly disposed of.	Confirmed as included within the 'materials storage, handling and waste disposal plan'	Compliant	
		d. Provide a description of the types of waste materials that are recycled by the farm.	Recycling for plastic / glass / paper on site, also feed bags and pallets. Feed delivery companies are contracted as part of the service to remove recyclable waste. Skretting Sales Manager Erin Agostini confirms waste is picked up by Global Wood Waste inc for processing		
		e. Others, please describe			
4.5.2	Indicator: Evidence that non-biological waste (including net pens) from grow-out site is either disposed of properly or recycled Requirement: Yes Applicability: All	a. Provide a description of the most common production waste materials and how the farm ensures these waste materials are properly disposed of. (see also 4.5.1c)	to landfill with the policy now to buy longer lasting nets to reduce wastage. Mortalities are sent to "Renueable Resources" or "SeaSoil". Renueable Resources Ltd is regulated by CFIA. Registration # 2009041D . Recyclables as detailed above.	Compliant	
		b. Provide a description of the types of waste materials that are recycled by the farm. (See also 4.5.1d)	Recycling for plastic / glass / paper on site, also feed bags and pallets. Feed delivery companies are contracted as part of the service to remove recyclable waste. Skretting Sales Manager Erin Agostini confirms waste is picked up by Global Wood Waste inc for processing		
		c. Inform the CAB of any infractions or fines for improper waste disposal received during the previous 12 months and corrective actions taken..	Katherine Dolmage, Certification Manager states that there have been no such fines imposed within the stated period.		
		d. Maintain records of disposal of waste materials including old nets and cage equipment.	Waste Management of Canada Corp (Coquitlam invoice 997 - 035000 for CA\$ 220 dated 16th January 2016 for a mix of commercial and industrial waste provided		
		e. Others, please describe			
Criterion 4.6 Energy consumption and greenhouse gas emissions on farms [84]					
		a. Maintain records for energy consumption by source (fuel, electricity) on the farm throughout each production cycle.	Records for energy consumption provided for the three farms under assessment.		

		Compliance Criteria	Audit evidence	Evaluation	Justification of classification of NC
		(Use as guidance for audit only)	1. Write down all audit evidence for each compliance criterion (CC). Audit evidence (including evidence of conformity and nonconformity) should be recorded so that the audit can be repeated by a different audit team. 2. Replace explanatory text in the 'Audit Evidence' column as appropriate. 3. If you see any Compliance Criteria which is not listed below, please describe in the blue cells below .	(Per indicator, select one category in the drop-down menu)	Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
4.6.1	Indicator: Presence of an energy use assessment verifying the energy consumption on the farm and representing the whole life cycle at sea, as outlined in Appendix V- 1 Requirement: Yes, measured in kilojoule/mt fish/production cycle Applicability: All	b. Calculate the farm's total energy consumption in kilojoules (kj) during the last production cycle.	Total energy consumption for the Bull Harbour provided as a running total as first cycle is 2,055,000,000 kj (cycle not completed yet).	Compliant	
		c. Calculate the total weight of fish in metric tons (mt) produced during the last production cycle.	1,552 metric tonnes produced to date		
		d. Using results from 4.6.1b and 4.6.1c, calculate energy consumption on the farm as required, reported as kilojoule/mt fish/production cycle.	1,324,392 kj /mt to date, calculation method confirmed.		
		e. Submit results of energy use calculations (4.6.1d) to ASC as per Appendix VI for each production cycle.	Confirmed as submitted to ASC 24th May 2016		
		f. Ensure that the farm has undergone an energy use assessment that was done in compliance with requirements of	Confirmed as being in line with the Appendix V-I requirement.		
		g. Others, please describe			
4.6.2	Indicator: Records of greenhouse gas (GHG [85]) emissions [86] on farm and evidence of an annual GHG assessment, as outlined in Appendix V-1 Requirement: Yes Applicability: All	a. Maintain records of greenhouse gas emissions on the farm.	GHG emissions to date as 83,444 kgs Co2 equivalent.	Compliant	
		b. At least annually, calculate all scope 1 and scope 2 GHG emissions in compliance with Appendix V-1.	Values confirmed as calculated on a monthly update basis.		
		c. For GHG calculations, select the emission factors which are best suited to the farm's operation. Document the source of those emissions factors.	Diesel , Propane, Gasoline are considered. Electricity is generated by diesel generators.		
		d. For GHG calculations involving conversion of non-CO ₂ gases to CO ₂ equivalents, specify the Global Warming Potential (GWP) used and its source.	Based on UK Government 2013 figures.		
		e. Submit results of GHG calculations (4.6.2d) to ASC as per Appendix VI at least once per year.	Confirmed as submitted to ASC 24th May 2016		
		f. Ensure that the farm undergoes a GHG assessment as outlined in Appendix V-1 at least annually.	Values confirmed as calculated on a monthly update basis.		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
		g. Others, please describe			
4.6.3	Indicator: Documentation of GHG emissions of the feed [87] used during the previous production cycle, as outlined in Appendix V, subsection 2 Requirement: Yes, within three years of the publication [88] of the SAD standards (i.e. by June 13, 2015) Applicability: All, after June 13, 2015	a. Obtain from feed supplier(s) a declaration detailing the GHG emissions of the feed (per kg feed).	46.2 kgs CO2 equivalent per metric tonne of feed stated by Skretting	Compliant	
		b. Multiply the GHG emissions per unit feed by the total amount of feed from each supplier used in the most recent completed production cycle.	100,214 kgs CO2 Equivalent		
		c. If client has more than one feed supplier, calculate the total sum of emissions from feed by summing the GHG emissions of feed from each supplier.	only Skretting used for feed supply.		
		d. Submit GHG emissions of feed to ASC as per Appendix VI for each production cycle.	Not submitted as cycle not completed.		
		e. Others, please describe			
Criterion 4.7 Non-therapeutic chemical inputs [89,90]					
4.7.1	Indicator: For farms that use copper-treated nets [91], evidence that nets are not cleaned [92] or treated in situ in the marine environment Requirement: Yes Applicability: All farms except as noted in [89]	a. Prepare a farm procedure for net cleaning and treatment that describes techniques, technologies, use of off-site facilities, and record keeping.	No copper treated nets used by MH Canada, policy in place since 2012.	N/A	
		b. Maintain records of antifoulants and other chemical treatments used on nets.	No copper treated nets used by MH Canada, policy in place since 2012.		
		c. Declare to the CAB whether copper-based treatments are used on nets.	No copper treated nets used by MH Canada, policy in place since 2012.		
		d. If copper-based treatments are used, maintain documentary evidence (see 4.7.1b) that farm policy and practice does not allow for heavy cleaning of copper-treated nets in situ.	No copper treated nets used by MH Canada, policy in place since 2012.		
		e. Inform ASC whether copper antifoulants are used on farm (yes or no) as per Appendix VI for each production cycle.	No copper treated nets used by MH Canada, policy in place since 2012.		
		f. Others, please describe			
		a. Declare to the CAB whether nets are cleaned on-land.	cleaners during their use at sea, only standard biological debris cleaned off by Badinotti net services pre-servicing and re-issue with any biological debris removed confirmed to put to '7 mile' landfill site in the district of Mount Waddington.		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
4.7.2	Indicator: For any farm that cleans nets at on-land sites, evidence that net-cleaning sites have effluent treatment [93] Requirement: Yes Applicability: All farms except as noted in [89]	b. If nets are cleaned on-land, obtain documentary evidence from each net-cleaning facility that effluent treatment is in place.	N/A as no copper treated nets in use; nets are cleaned in situ with mechanical cleaners, Only standard biological debris cleaned off by Badinotti net services pre-servicing.	Compliant	
		c. If yes to 4.7.2b, obtain evidence that effluent treatment used at the cleaning site is an appropriate technology to capture of copper in effluents.	N/A as no copper treated nets in use; nets are cleaned in situ with mechanical cleaners, Only standard biological debris cleaned off by Badinotti net services pre-servicing.		
		d. Others, please describe			
4.7.3	Indicator: For farms that use copper nets or copper-treated nets, evidence of testing for copper level in the sediment outside of the AZE, following methodology in Appendix I-1 Requirement: Yes Applicability: All farms except as noted in [89]	a. Declare to the CAB whether the farm uses copper nets or copper-treated nets. (See also 4.7.1c). If "no", Indicator 4.7.3 does not apply.	No copper treated nets used by MH Canada, policy in place since 2012.	N/A	
		b. If "yes" in 4.7.3a, measure and record copper in sediment samples from the reference stations specified in 2.1.1d and 2.1.2c which lie outside the AZE.	No copper treated nets used by MH Canada, policy in place since 2012.		
		c. If "yes" in 4.7.3a, maintain records of testing methods, equipment, and laboratories used to test copper level in sediments from 4.7.3b.	No copper treated nets used by MH Canada, policy in place since 2012.		
		d. Others, please describe			
4.7.4	Indicator: Evidence that copper levels [94] are < 34 mg Cu/kg dry sediment weight OR in instances where the Cu in the sediment exceeds 34 mg Cu/kg dry sediment weight, demonstration that the Cu concentration falls within the range of background concentrations as measured at three reference sites in the water body Requirement: Yes	a. Inform the CAB whether: 1) farm is exempt from Indicator 4.7.4 (as per 4.7.3a), or 2) Farm has conducted testing of copper levels in sediment.	No copper treated nets used by MH Canada, policy in place since 2012.	N/A	
		b. Provide evidence from measurements taken in 4.7.3b that copper levels are < 34 mg Cu/kg dry sediment weight.	No copper treated nets used by MH Canada, policy in place since 2012.		
		c. If copper levels in 4.7.4b are ≥ 34 mg Cu/kg dry sediment weight, provide evidence the farm tested copper levels in sediments from reference sites as described in Appendix I-1 (also see Indicators 2.1.1 and 2.1.2).	No copper treated nets used by MH Canada, policy in place since 2012.		
		d. Analyze results from 4.7.4c to show the background copper concentrations as measured at three reference sites in the water body.	No copper treated nets used by MH Canada, policy in place since 2012.		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
	Applicability: All farms except as noted in [89] and excluding those farms shown to be exempt from Indicator 4.7.3	e. Submit data on copper levels in sediments to ASC as per Appendix VI for each production cycle. f. Others, please describe	No copper treated nets used by MH Canada, policy in place since 2012.		
4.7.5	Indicator: Evidence that the type of biocides used in net antifouling are approved according to legislation in the European Union, or the United States, or Australia Requirement: Yes Applicability: All farms except as noted in [89]	a. Identify all biocides used by the farm in net antifouling. b. Compile documentary evidence to show that each chemical used in 4.7.5a is approved according to legislation in one or more of the following jurisdictions: the European Union, the United States, or Australia. c. Others, please describe	No antifouling of any type stated to be used to treat nets, no indication of any such products being used during site inspection. No antifouling of any type stated to be used to treat nets, no indication of any such products being used during site inspection.	N/A	
PRINCIPLE 5: MANAGE DISEASE AND PARASITES IN AN ENVIRONMENTALLY RESPONSIBLE MANNER					
<i>Criterion 5.1 Survival and health of farmed fish [95]</i>					
5.1.1	Indicator: Evidence of a fish health management plan for the identification and monitoring of fish diseases and parasites Requirement: Yes Applicability: All	a. Prepare a fish health management plan that incorporates components related to identification and monitoring of fish disease and parasites. This plan may be part of a more comprehensive farm planning document. b. Ensure that the farm's current fish health management plan was reviewed and approved by the farm's designated veterinarian [96]. c. Others, please describe	Salmonid Health Management Plan, updated October 2015 provided. Health Department back up for mortality events determination, manager and staff trained and experienced. Salmonid Health Management Plan, October 2015 provided. with evidence of review by Diane Morrison also provided.	Compliant	
5.1.2	Indicator: Site visits by a designated veterinarian [96] at least four times a year, and by a fish health manager [97] at least once a month Requirement: Yes Applicability: All	a. Maintain records of visits by the designated veterinarian [96] and fish health managers [97]. If schedule cannot be met, a risk assessment must be provided. b. Maintain a current list of personnel who are employed as the farm's designated veterinarian(s) [96] and fish health manager(s) [97]. c. Maintain records of the qualifications of persons identified in 5.1.2b.	Regular visits by vet and health team confirmed through visitor log checks, it is noted that some visits of the vet and health technicians occur on the same day. Diane Morrison Veterinary Surgeon with support from Senior Fish Health Technician Fish Health Technician Diane Morrison qualified from the Ontario Veterinary College 1992 and has worked with Marine Harvest since September 2000, The Senior Fish Health Technician and Fish Health Technician are both BSc. Graduates	Compliant	

		Compliance Criteria	Audit evidence	Evaluation	Justification of classification of NC
		(Use as guidance for audit only)	1. Write down all audit evidence for each compliance criterion (CC). Audit evidence (including evidence of conformity and nonconformity) should be recorded so that the audit can be repeated by a different audit team. 2. Replace explanatory text in the 'Audit Evidence' column as appropriate. 3. If you see any Compliance Criteria which is not listed below, please describe in the blue cells below .	(Per indicator, select one category in the drop-down menu)	Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
		d. Others, please describe			
5.1.3	Indicator: Percentage of dead fish removed and disposed of in a responsible manner Requirement: 100% [98] Applicability: All	a. Maintain records of mortality removals to show that dead fish are removed regularly and disposed of in a responsible	Mortality records in Aquafarmer checked and confirm appropriate details included	Compliant	
		b. Collect documentation to show that disposal methods are in line with practices recommended by fish health managers and/or relevant legal authorities.	Mortality removals observed during on-site inspection, dead fish are stored in sealed tubs prior to uplift and disposal by approved contractor, covered by MH SOP SW 124.		
		c. For any exceptional mortality event where dead fish were not collected for post-mortem analysis, keep a written justification.	The range of mortality events sampled included transfer related mortalities but no exceptional events were recorded.		
		d. Others, please describe			
	Indicator: Percentage of mortalities that are recorded, classified and receive a post-mortem analysis	a. Maintain detailed records for all mortalities and post-mortem analyses including: - date of mortality and date of post-mortem analysis; - total number of mortalities and number receiving post-mortem analysis; - name of the person or lab conducting the post-mortem analyses; - qualifications of the individual (e.g. veterinarian [96], fish health manager [97]); - cause of mortality (specify disease or pathogen) where known; and - classification as 'unexplained' when cause of mortality is unknown (see 5.1.6).	Mortality records on Aquafarmer were examined and a mortality uplift of a pen to remove dead fish was observed. The farm worker who carried out the operation internally examined each fish (the fish sampled were relatively fresh and supported the farms attestation for daily removal) and recorded his interpretation of cause for the database. Sampling of fish where concerns are raised will be passed on to the fish health team		
		b. For each mortality event, ensure that post-mortem analyses are done on a statistically relevant number of fish and keep a record of the results.	Health Department available for analysis of any unexplained mortalities which may arise along with MH Canada Lab back up based in Campbell River. Third Party assistance available from the Provincial Animal Health Centre located in Abbotsford, listed as a fully accredited Laboratory of the American Association of Veterinary Laboratory Diagnosticians : http://www.aavld.org/accredited-laboratories Further support is available from the Canadian Academy of Health Sciences located in Campbell River.		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
5.1.4	Requirement: 100% [99] Applicability: All	c. If on-site diagnosis is inconclusive and disease is suspected or results are inconclusive over a 1-2 week period, ensure that fish are sent to an off-site laboratory for diagnosis and keep a record of the results (5.1.4a). d. Using results from 5.1.3a-c, classify each mortality event and keep a record of those classifications. e. Provide additional evidence to show how farm records in 5.1.4a-d cover all mortalities from the current and previous two production cycles (as needed). f. Submit data on numbers and causes of mortalities to ASC as per Appendix VI on an ongoing basis (i.e. at least once per year and for each production cycle). g. Others, please describe	1. Write down all audit evidence for each compliance criterion (CC). Audit evidence (including evidence of conformity and nonconformity) should be recorded so that the audit can be repeated by a different audit team. 2. Replace explanatory text in the 'Audit Evidence' column as appropriate. 3. If you see any Compliance Criteria which is not listed below, please describe in the blue cells below . MH Canada Lab back up based in Campbell River. Third Party assistance available from the Provincial Animal Health Centre located in Abbotsford, listed as a fully accredited Laboratory of the American Association of Veterinary Laboratory Diagnosticians : http://www.aavld.org/accredited-laboratories Further support is available from the Centre for Aquatic Health Sciences located in Campbell River. Mortalities confirmed as logged in Aquafarmer by cause, specific mortality events covered by vet diagnosis as required. Aquafarmer records confirmed to record the mortality details for the site for the cycle from input to date. Mortalities with cause of death covered in the ASC Transparency submissions.	Compliant	
5.1.5	Indicator: Maximum viral disease-related mortality [100] on farm during the most recent production cycle Requirement: ≤ 10% Applicability: All	a. Calculate the total number of mortalities that were diagnosed (see 5.1.4) as being related to viral disease. b. Combine the results from 5.1.5a with the total number of unspecified and unexplained mortalities from the most recent complete production cycle. Divide this by the total number of fish produced in the production cycle (x100) to calculate percent maximum viral disease-related mortality. c. Submit data on total mortality and viral disease-related mortality to ASC as per Appendix VI on an ongoing basis (i.e. at least once per year and for each production cycle). d. Others, please describe	N/A no completed production cycle N/A no completed production cycle N/A no completed production cycle	Compliant	
	Indicator: Maximum unexplained mortality rate from each of the	a. Use records in 5.1.4a to calculate the unexplained mortality rate (%) for the most recent full production cycle. If rate was ≤ 6%, then the requirement of 5.1.6 does not apply. If total mortality rate was > 6%, proceed to 5.1.6b.	N/A first production cycle		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
5.1.6	previous two production cycles, for farms with total mortality > 6%	b. Calculate the unexplained mortality rate (%) for each of the two production cycles immediately prior to the current cycle. For first audit, calculation must cover one full production cycle immediately prior to the current cycle.	N/A first production cycle	Compliant	
	Requirement: ≤ 40% of total mortalities	c. Submit data on maximum unexplained mortality to ASC as per Appendix VI for each production cycle.	Mortalities covered in the ASC Transparency submissions		
	Applicability: All farms with > 6% total mortality in the most recent complete production cycle.	d. Others, please describe			
5.1.7	Indicator: A farm-specific mortalities reduction program that includes defined annual targets for reductions in mortalities and reductions in unexplained mortalities Requirement: Yes Applicability: All	a. Use records in 5.1.4a to assemble a time-series dataset on farm-specific mortalities rates and unexplained mortality rates.	Confirmed in Aquafarmer	Compliant	
		b. Use the data in 5.1.7a and advice from the veterinarian and/or fish health manager to develop a mortalities-reduction program that defines annual targets for reductions in total mortality and unexplained mortality.	Mortality reduction plans include separation of equipment with local neighbouring sites, Plankton sampling procedures increased with better far field monitoring and ongoing net design changes to improve stock protection from predators.		
		c. Ensure that farm management communicates with the veterinarian, fish health manager, and staff about annual targets and planned actions to meet targets.	Staff awareness of practices demonstrated .		
		d. Others, please describe			
Criterion 5.2 Therapeutic treatments [101]					
	Indicator: On-farm documentation that includes, at a minimum, detailed information on all chemicals [102] and therapeutants used during the most recent production cycle, the amounts used (including grams per ton of fish produced), the date	a. Maintain a detailed record of all chemical and therapeutant use that includes: - name of the veterinarian prescribing treatment; - product name and chemical name; - reason for use (specific disease) - date(s) of treatment; - amount (g) of product used; - dosage; - mt of fish treated; - the WHO classification of antibiotics (also see note under 5.2.8); and - the supplier of the chemical or therapeutant.	Only chemical and therapeutant usage is listed as peroxide.		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
5.2.1	(ton or fish produced), the dates used, which group of fish were treated and against which diseases, proof of proper dosing, and all disease and pathogens detected on the site Requirement: Yes Applicability: All	b. If not already available, assemble records of chemical and therapeutant use to address all points in 5.2.1a for the previous two production cycles. For first audits, available records must cover one full production cycle immediately prior to the current cycle.	See 5.2.1a	Compliant	
		c. Submit information on therapeutant use (data from 5.2.1a) to ASC as per Appendix VI on an ongoing basis (i.e. at least once per year and for each production cycle).	Confirmed as included in the submitted ASC transparency checklist.		
		d. Others, please describe			
5.2.2	Indicator: Allowance for use of therapeutic treatments that include antibiotics or chemicals that are banned [103] in any of the primary salmon producing or importing countries [104] Requirement: None Applicability: All	a. Prepare a list of therapeutants, including antibiotics and chemicals, that are proactively banned for use in food fish for the primary salmon producing and importing countries listed in [104].	Marine Harvest maintains a global register of the therapeutants and other chemicals permitted and banned along with withdrawal period requirements and residue limits, this is monitored and updated regularly	Compliant	
		b. Maintain records of voluntary and/or mandatory chemical residue testing conducted or commissioned by the farm from the prior and current production cycles.	Maxxam Analytics (ISO 17025 certified) carry out pre-harvest testing for sites for a range of possible contaminants and possible treatment residues		
		-	All therapeutant use confirmed to be vet prescribed and recorded in the Aquafarmer system. No banned substances recorded or suspected to have been used.		
		d. Others, please describe			
5.2.3	Indicator: Percentage of medication events that are prescribed by a veterinarian Requirement: 100% Applicability: All	a. Obtain prescription for all therapeutant use in advance of application from the farm veterinarian (or equivalent, see [96] for definition of veterinarian).	Prescription records are retained on site as required by the DFO as part of their licence conditions in the Drug Treatment Record, e.g. sole treatment to date Peroxide treatment listed for 21st - 25th March 2016 (16-019) prescribed by Diane Morrison.	Compliant	
		b. Maintain copies of all prescriptions and records of veterinarian responsible for all medication events. Records can be kept in conjunction with those for 5.2.1 and should be kept for the current and two prior production cycles.	Confirmed as above, also recorded in Aquafarmer database.		
		c. Others, please describe			
		a. Incorporate withholding periods into the farm's fish health management plan (see 5.1.1a).	Included in the Drug Treatment Record - Salt Water		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
5.2.4	Indicator: Compliance with all withholding periods after treatments Requirement: Yes Applicability: All	b. Compile and maintain documentation on legally-required withholding periods for all treatments used on-farm. Withholding period is the time interval after the withdrawal of a drug from the treatment of the salmon before the salmon can be harvested for use as food.	Canadian Government website covers therapeutants permitted for use and includes details of withdrawal periods. http://www.hc-sc.gc.ca/dhp-mps/vet/legislation/pol/aquaculture_anim-eng.php	Compliant	
		c. Show compliance with all withholding periods by providing treatment records (see 5.2.1a) and harvest dates for the most recent production cycle.	Covered by Aquafarmer controls which block release of fish populations for harvest if any withdrawal period has not been completed		
		d. Others, please describe			
5.2.5	Indicator: Maximum farm level cumulative parasiticide treatment index (PTI) score as calculated according to the formula in Appendix VII Requirement: PTI score \leq 13 Applicability: All	a. Using farm data for therapeutants usage (5.2.1a) and the formula presented in Appendix VII, calculate the cumulative parasiticide treatment index (PTI) score for the most recent production cycle. Calculation should be made and updated on an ongoing basis throughout the cycle by farm manager, fish health manager, and/or veterinarian.	The only treatment for Bull Harbour is the single peroxide treatment; PTI = 0.	Compliant	
		b. Provide the auditor with access to records showing how the farm calculated the PTI score.	No Calculation required		
		c. Submit data on farm level cumulative PTI score to ASC as per Appendix VI for each production cycle.	Confirmed as submitted in the transparency checklist.		
		d. Others, please describe			
5.2.6	Indicator: For farms with a cumulative PTI \geq 6 in the most recent production cycle, demonstration that parasiticide load [105] is at least 15% less that of the average of the two previous production cycles Requirement: Yes, within five years	a. Review PTI scores from 5.2.5a to determine if cumulative PTI \geq 6 in the most recent production cycle. If yes, proceed to 5.2.6b; if no, Indicator 5.2.6 does not apply.	N/A until June 2017	Compliant	
		b. Using results from 5.2.5 and the weight of fish treated (kg), calculate parasiticide load in the most recent production cycle [105].	N/A until June 2017		
		c. Calculate parasiticide load in the two previous production cycles as above (5.2.6b) and compute the average. Calculate the percent difference in parasiticide load between current cycle and average of two previous cycles. For first audit, calculation must cover one full production cycle immediately prior to the current cycle.	N/A until June 2017		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
	of the publication of the SAD standard (i.e. by June 13, 2017) Applicability: All farms with a cumulative PTI ≥ 6 in the most recent production cycle	d. As applicable, submit data to ASC on parasiticide load for the most recent production cycle and the two previous production cycles (Appendix VI). e. Others, please describe	N/A until June 2017		
5.2.7	Indicator: Allowance for prophylactic use of antimicrobial treatments [106] Requirement: None Applicability: All	a. Maintain records for all purchases of antibiotics (invoices, prescriptions) for the current and prior production cycles. b. Maintain a detailed log of all medication-related events (see also 5.2.1a and 5.2.3) c. Calculate the total amount (g) and treatments (#) of antibiotics used during the current and prior production cycles (see also 5.2.9). d. Others, please describe	Treatment records checked and show no use of Antibiotics recorded for site. Treatment records checked and show no use of Antibiotics recorded for site. Treatment records checked and show no use of Antibiotics recorded for site.	Compliant	
5.2.8	Indicator: Allowance for use of antibiotics listed as critically important for human medicine by the World Health Organization (WHO [107]) Requirement: None [108] Applicability: All	a. Maintain a current version of the WHO list of antimicrobials critically and highly important for human health [107]. b. If the farm has <u>not</u> used any antibiotics listed as critically important (5.2.8a) in the current production cycle, inform the CAB and proceed to schedule the audit. c. If the farm <u>has</u> used antibiotics listed as critically important (5.2.8a) to treat any fish during the current production cycle, inform the CAB prior to scheduling audit. d. If yes to 5.2.8c, request an exemption from the CAB to certify only a portion of the farm. Prior to the audit, provide the CAB with records sufficient to establish details of treatment, which pens were treated, and how the farm will ensure full traceability and separation of treated fish through and post- e. Others, please describe	Confirmed as listed in the "critically important antimicrobials for human medicine" 3rd revision 2011 available on the internet at the farm. Treatment records checked and show no use of Antibiotics recorded for site. N/A N/A	Compliant	
	Indicator: Number of treatments	a. Maintain records of all treatments of antibiotics (see 5.2.1a). For first audits, farm records must cover the current and immediately prior production cycles in a verifiable statement.	Treatment records checked and show no use of Antibiotics recorded for site.		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
5.2.9	[109] of antibiotics over the most recent production cycle Requirement: ≤ 3 Applicability: All	b. Calculate the total number of treatments of antibiotics over the most recent production cycle and supply a verifiable statement of this calculation. c. Others, please describe	Treatment records checked and show no use of Antibiotics recorded for site.	Compliant	
5.2.10	Indicator: If more than one antibiotic treatment is used in the most recent production cycle, demonstration that the antibiotic load [110] is at least 15% less than that of the average of the two previous production cycles Requirement: Yes [111], within five years of the publication of the SAD standard (i.e. full compliance by June 13, 2017) Applicability: All	a. Use results from 5.2.9b to show whether more than one antibiotic treatment was used in the most recent production cycle. If not, then the requirement of 5.2.10 does not apply. If yes, then proceed to 5.2.10b. b. Calculate antibiotic load (antibiotic load = the sum of the total amount of active ingredient of antibiotic used in kg) for most recent production cycle and for the two previous production cycles. For first audit, calculation must cover one full production cycle immediately prior to the current cycle. c. Provide the auditor with calculations showing that the antibiotic load of the most recent production cycle is at least 15% less than that of the average of the two previous production cycles. d. Submit data on antibiotic load to ASC as per Appendix VI (if applicable) for each production cycle. e. Others, please describe	N/A until June 2017 N/A until June 2017 N/A until June 2017 N/A until June 2017	N/A	
	Indicator: Presence of documents demonstrating that the farm has provided buyers [112] of its salmon a list of all therapeutants used in	a. Prepare a procedure which outlines how the farm provides buyers [112] of its salmon with a list of all therapeutants used in production (see 4.4.3b).	An annually updated document listing the therapeutant options employed for treatments by the company is provided to customers		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
5.2.11	List of all therapeutants used in production Requirement: Yes Applicability: All	b. Maintain records showing the farm has informed all buyers of its salmon about all therapeutants used in production. c. Others, please describe	1. Write down all audit evidence for each compliance criterion (CC). Audit evidence (including evidence of conformity and nonconformity) should be recorded so that the audit can be repeated by a different audit team. 2. Replace explanatory text in the 'Audit Evidence' column as appropriate. 3. If you see any Compliance Criteria which is not listed below, please describe in the blue cells below . Marine Harvest Canada undertake to update their suppliers with a listing of any potential treatments that might be used on fish sold to them. All potential treatments are confirmed as approved by the CFIA.	Compliant	
Criterion 5.3 Resistance of parasites, viruses and bacteria to medicinal treatments					
5.3.1	Indicator: Bio-assay analysis to determine resistance when two applications of a treatment have not produced the expected effect Requirement: Yes Applicability: All	a. In addition to recording all therapeutic treatments (5.2.1a), keep a record of all cases where the farm uses two successive medicinal treatments. b. Whenever the farm uses two successive treatments, keep records showing how the farm evaluates the observed effect of treatment against the expected effect of treatment. c. For any result of 5.3.1b that did not produce the expected effect, ensure that a bio-assay analysis of resistance is d. Keep a record of all results arising from 5.3.1c. e. Others, please describe	N/A Single Hydrogen peroxide treatment administered to date N/A Single Hydrogen peroxide treatment administered to date N/A Single Hydrogen peroxide treatment administered to date N/A Single Hydrogen peroxide treatment administered to date	N/A	
5.3.2	Indicator: When bio-assay tests determine resistance is forming, use of an alternative, permitted treatment, or an immediate harvest of all fish on the site Requirement: Yes Applicability: All	a. Review results of bio-assay tests (5.3.1d) for evidence that resistance has formed. If yes, proceed to 5.3.2b. If no, then Indicator 5.3.2 is not applicable. b. When bio-assay tests show evidence that resistance has formed, keep records showing that the farm took one of two actions: - used an alternative treatment (if permitted in the area of operation); or - immediately harvested all fish on site. c. Others, please describe	N/A Single Hydrogen peroxide treatment administered to date N/A Single Hydrogen peroxide treatment administered to date	N/A	
Criterion 5.4 Biosecurity management [113]					
5.4.1	Indicator: Evidence that all salmon on the site are a single-year class [114] Requirement: 100% [115]	a. Keep records of the start and end dates of periods when the site is fully fallow after harvest. b. Provide evidence of stocking dates (purchase receipts, delivery records) to show that there were no gaps > 6 months for smolt inputs for the current production cycle. -	Confirmed through site inspection and Aquafarmer stock records Confirmed through site inspection and Aquafarmer stock records Confirmed through site inspection and Aquafarmer stock records	Compliant	

		Compliance Criteria	Audit evidence	Evaluation	Justification of classification of NC
		(Use as guidance for audit only)	1. Write down all audit evidence for each compliance criterion (CC). Audit evidence (including evidence of conformity and nonconformity) should be recorded so that the audit can be repeated by a different audit team. 2. Replace explanatory text in the 'Audit Evidence' column as appropriate. 3. If you see any Compliance Criteria which is not listed below, please describe in the blue cells below .	(Per indicator, select one category in the drop-down menu)	Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
	Applicability: All farms except as noted in [115]	d. Others, please describe			
5.4.2	Indicator: Evidence that if the farm suspects an unidentifiable transmissible agent, or if the farm experiences unexplained increased mortality, [116] the farm has: 1. Reported the issue to the ABM and to the appropriate regulatory authority 2. Increased monitoring and surveillance [117] on the farm and within the ABM 3. Promptly [118] made findings publicly available Requirement: Yes Applicability: All	a. For mortality events logged in 5.1.4a, show evidence that the farm promptly evaluated each to determine whether it was a statistically significant increase over background mortality rate on a monthly basis [116]. The accepted level of significance (for example, $p < 0.05$) should be agreed between farm and CAB.	No suspected mortality events with "unidentified transmissible agent"	N/A	
		b. For mortality events logged in 5.1.4a, record whether the farm did or did not suspect (yes or no) an unidentified transmissible agent.	N/A		
		c. Proceed to 5.4.2d if, during the most recent production cycle, either: - results from 5.4.2a showed a statistically significant increase in unexplained mortalities; or - the answer to 5.4.2b was 'yes'. Otherwise, Indicator 5.4.2 is not applicable.	N/A		
		d. If required, ensure that the farm takes and records the following steps: 1) Report the issue to the ABM and to the appropriate regulatory authority; 2) Increase monitoring and surveillance [117] on the farm and within the ABM; and 3) Promptly (within one month) make findings publicly	N/A		
		e. As applicable, submit data to ASC as per Appendix VI about unidentified transmissible agents or unexplained increases in mortality. If applicable, then data are to be sent to ASC on an ongoing basis (i.e. at least once per year and for each production cycle).	N/A		
		f. Others, please describe			
5.4.3	Indicator: Evidence of compliance [119] with the OIE Aquatic Animal Health Code [120]	a. Maintain a current version of the OIE Aquatic Animal Health Code on site or ensure staff have access to the most current version.	Sharepoint site includes links to the OIE website	Compliant	
		b. Develop policies and procedures as needed to ensure that farm practices remain consistent with the OIE Aquatic Animal Health Code (5.4.3a) and with actions required under indicator	Marine Harvest Canada's Fish Health Management plan incorporates elements consistent with the OIE Code.		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
	Requirement: Yes	-	Staff appear competent through on-site discussions relating to e.g. Biosecurity and mortality handling.		
	Applicability: All	d. Others, please describe			
5.4.4	Indicator: If an OIE-notifiable disease [121] is confirmed on the farm, evidence that: 1. the farm has, at a minimum, immediately culled the pen(s) in which the disease was detected 2. the farm immediately notified the other farms in the ABM [122] 3. the farm and the ABM enhanced monitoring and conducted rigorous testing for the disease 4. the farm promptly [123] made findings publicly available Requirement: Yes Applicability: All	a. Ensure that farm policies and procedures in 5.4.3a describe the four actions required under Indicator 5.4.4 in response to an OIE-notifiable disease on the farm.	Confirmed through examination of Mortality records that no OIE notifiable diseases have been recorded for this site.	N/A	
		b. Inform the CAB if an OIE-notifiable disease has been confirmed on the farm during the current production cycle or the two previous production cycles. If yes, proceed to 5.4.4c. If no, then 5.4.4c and 5.4.4d do not apply.	N/A		
		c. If an OIE-notifiable disease was confirmed on the farm (see 5.4.4b), then retain documentary evidence to show that the farm: 1) immediately culled the pen(s) in which the disease was detected; 2) immediately notified the other farms in the ABM [122] 3) enhanced monitoring and conducted rigorous testing for the disease; and 4) promptly (within one month) made findings publicly	N/A		
		d. As applicable, submit data to ASC as per Appendix VI about any OIE-notifiable disease that was confirmed on the farm. If applicable, then data are to be sent to ASC on an ongoing basis (i.e. at least once per year and for each production cycle).	N/A		
		-	N/A		
		f. Others, please describe			

PRINCIPLE 6: DEVELOP AND OPERATE FARMS IN A SOCIALLY RESPONSIBLE MANNER
 6.1 Freedom of association and collective bargaining [124]

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
6.1.1	<p>Indicator: Evidence that workers have access to trade unions (if they exist) and union representative(s) chosen by themselves without managerial interference</p> <p>Requirement: Yes</p> <p>Applicability: All</p>	<p>a. Workers have the freedom to join any trade union, free of any form of interference from employers or competing organizations set up or backed by the employer. Farms shall prepare documentation to demonstrate to the auditor that domestic regulation fully meets these criteria.</p>	<p>1. Write down all audit evidence for each compliance criterion (CC). Audit evidence (including evidence of conformity and nonconformity) should be recorded so that the audit can be repeated by a different audit team.</p> <p>2. Replace explanatory text in the 'Audit Evidence' column as appropriate.</p> <p>3. If you see any Compliance Criteria which is not listed below, please describe in the blue cells below.</p>	Compliant	
		<p>b. Union representatives (or worker representatives) are chosen by workers without managerial interference. ILO specifically prohibits "acts which are designated to promote the establishment of worker organizations or to support worker organizations under the control of employers or employers' organizations."</p>	<p>Marine Harvest Code of Conduct states within section 5.3, "Marine Harvest recognizes the right of all workers and employees freely to form and join groups for the promotion and defense of their occupational interests, including the right to engage in collective bargaining."</p>		
		<p>c. Trade union representatives (or worker representatives) have access to their members in the workplace at reasonable times on the premises.</p>	<p>See section 6.1.1 a & 6.1.1b</p>		
		<p>d. Be advised that workers and union representatives (if they exist) will be interviewed to confirm the above.</p>	<p>There is a Code of Conduct, which is provided to all employees and they are tested to show they have understand the Code of conducts. The Code of Conduct can also be accessed via intranet, which also allows access to human resources Policy & Procedure Manual. Code of Conduct section 5.3. relates to this area.</p>		
		<p>e. Others, please describe</p>			
	<p>Indicator: Evidence that workers are free to form organizations, including</p>	<p>a. Employment contract explicitly states the worker's right of freedom of association.</p> <p>b. Employer communicates that workers are free to form organizations to advocate for and protect work rights (e.g. farm policies on Freedom of Association; see 6.12.1).</p>	<p>The worker's right of freedom of association is Stated in the contract of employment and in 5.3 of the code of conduct.</p> <p>Employees sign and are tested on Code of Conduct. see 6.1.2a. Code of Conduct section 5.3 relates to this section.</p>		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
6.1.2	unions, to advocate for and protect their rights Requirement: Yes Applicability: All	c. Be advised that workers will be interviewed to confirm the above.	There is a Code of Conduct, which is provided to all employees and they are tested to show they have understand the Code of conducts. The Code of Conduct can also be accessed via intranet, which also allows access to human resources Policy & Procedure Manual. Code of Conduct section 5.3. relates to this area. The employees confirmed that they understood their right to organize.	Compliant	
		d. Others, please describe			
6.1.3	Indicator: Evidence that workers are free and able to bargain collectively for their rights Requirement: Yes Applicability: All	a. Local trade union, or where none exists a reputable civil-society organization, confirms no outstanding cases against the farm site management for violations of employees' freedom of association and collective bargaining rights.	No outstanding cases against the farm site management for violations of employees' freedom of association and collective bargaining rights.	Compliant	
		b. Employer has explicitly communicated a commitment to ensure the collective bargaining rights of all workers.	Stated in code of conduct section 5.3 and confirmed by worker interviews		
		c. There is documentary evidence that workers are free and able to bargain collectively (e.g. collective bargaining agreements, meeting minutes, or complaint resolutions).	Stated in Marine Harvest Code of Conduct which is signed by the employees.		
		d. Others, please describe			
Criterion 6.2 Child labor					
6.2.1	Indicator: Number of incidences of child [125] labor [126] Requirement: None Applicability: All except as noted in [125]	a. In most countries, the law states that minimum age for employment is 15 years. There are two possible exceptions: - in developing countries where the legal minimum age may be set to 14 years (see footnote 125); or - in countries where the legal minimum age is set higher than 15 years, in which case the legal minimum age of the country is followed. If the farm operates in a country where the legal minimum ages is not 15, then the employer shall maintain documentation attesting to this fact.	Ages of all workers is stored on Human Resources management system. There is no persons employed under the age of 15. Marine Harvest state in section 5.4 of the code of conduct " Marine Harvest is committed to the abolition of child labor, and all forms of forced or compulsory labor." "Marine Harvest considers the minimum age for employment as not lower than the age of completion of compulsory schooling as set by national law, and in any event not lower than 15 years of age."	Compliant	
		b. Minimum age of permanent workers is 15 or older (except in countries as noted above).	Verified through Human Resources Management System		
		c. Employer maintains age records for employees that are sufficient to demonstrate compliance.	Identification is held on file for all farm employees and is signed and verified by senior Management		
		d. Others, please describe			

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
6.2.2	Indicator: Percentage of young workers [127] that are protected [128] Requirement: 100% Applicability: All	a. Young workers are appropriately identified in company policies & training programs, and job descriptions are available for all young workers at the site.	There is policy stating the rules on employing young workers. The Marine Harvest code of conduct section 5.4 sets out the main rules. Young workers risk assessment is carried out and displayed within the working areas. All young workers are assessed prior to employment	Compliant	
		b. All young workers (from age 15 to less than 18) are identified and their ages are confirmed with copies of IDs.	No young worker at the facilities		
		c. Daily records of working hours (i.e. timesheets) are available for all young workers.	All workers have the working hours recorded on a time management system		
		d. For young workers, the combined daily transportation time and school time and work time does not exceed 10 hours.	Working hours are in line with local law. Working hours would be verified for young workers through time management systems. However no young workers are on site.		
		e. Young workers are not exposed to hazards [129] and do not perform hazardous work [130]. Work on floating cages in poor weather conditions shall be considered hazardous.	No young worker at the facilities		
		f. Be advised that the site will be inspected and young workers will be interviewed to confirm compliance.	No young worker present on the day of the site inspection. The site was inspected with young workers in mind. Controlled documentation and risk assessment was available on site.		
		g. Others, please describe			
		Criterion 6.3 Forced, bonded or compulsory labor			
6.3.1	Indicator: Number of incidences of forced, [131] bonded [132] or compulsory labor Requirement: None Applicability: All	a. Contracts are clearly stated and understood by employees. Contracts do not lead to workers being indebted (i.e. no 'pay to work' schemes through labor contractors or training credit programs).	All employees are provided with a contracts of employment. Confirmed within employee interviews that employees received a copy of the contract of employment. All contracts have been signed by workers	Compliant	
		b. Employees are free to leave workplace and manage their own time.	Through worker interviews and documentation checks it was confirmed that all working hours are conducted on a voluntary basis.		
		c. Employer does not withhold employee's original identity documents.	Employer does not withhold employee's original identity documents. Confirmed through employee interviews		
		d. Employer does not withhold any part of workers' salaries, benefits, property or documents in order to oblige them to continue working for employer.	Employer does not withhold any part of workers' salaries, benefits, property or documents in order to oblige them to continue working for employer. This was confirmed within employee interviews		
		e. Employees are not to be obligated to stay in job to repay	No employees are repaying debt. Confirmed in worker interviews		
		f. Maintain payroll records and be advised that workers will be interviewed to confirm the above.	No employees are repaying debt. Confirmed in worker interviews		
		g. Others, please describe			
		Criterion 6.4 Discrimination [133]			

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
6.4.1	<p>Indicator: Evidence of comprehensive [134] and proactive anti-discrimination policies, procedures and practices</p> <p>Requirement: Yes</p> <p>Applicability: All</p>	a. Employer has written anti-discrimination policy in place, stating that the company does not engage in or support discrimination in hiring, remuneration, access to training, promotion, termination or retirement based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, age or any other condition that may give rise to discrimination.	Stated in Marine Harvest Code of conduct section 5.2 "All Marine Harvest's activities shall be conducted without discrimination on the basis of race, ethnicity, national or other origin, disability, age, gender, sexual orientation, language, religion, or any other characteristic where a person is not treated as an individual" .& 6.1. "Marine Harvest aims to be an open, positive and supportive working community." The anti-discrimination policy that is in place, states that the company does not engage in or support discrimination in hiring, remuneration, access to training,	Compliant	
		b. Employer has clear and transparent company procedures that outline how to raise, file, and respond to discrimination complaints.	Discrimination complaints are dealt with through the grievance procedures. Grievance procedures are communicated to all workers		
		c. Employer respects the principle of equal pay for equal work and equal access to job opportunities, promotions and raises.	All employees are graded and paid in accordance the the pay structure. There was no evidence of unequal pay or unequal access to job opportunities, promotions and raises.		
		d. All managers and supervisors receive training on diversity and non-discrimination. All personnel receive non-discrimination training. Internal or external training acceptable if proven effective.	All mangers have been trained in equality and diversity. This is part of the code of conduct training.		
		e. Others, please describe			
6.4.2	<p>Indicator: Number of incidences of discrimination</p> <p>Requirement: None</p> <p>Applicability: All</p>	a. Employer maintains a record of all discrimination complaints. These records do not show evidence for discrimination.	Facility has a process to record of all discrimination complaints. To date there has not been any complaints. There is no evidence of discrimination	Compliant	
		b. Be advised that worker testimonies will be used to confirm that the company does not interfere with the rights of personnel to observe tenets or practices, or to meet needs related to race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or any other condition that may give rise to discrimination.	Workers interviewed stated that the company did not discriminate against them. Workers that were interviewed had not experienced or heard of any issues with regards to discrimination.		
		c. Others, please describe			
Criterion 6.5 Work environment health and safety					

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
6.5.1	<p>Indicator: Percentage of workers trained in health and safety practices, procedures [135] and policies on a yearly basis</p> <p>Requirement: 100%</p> <p>Applicability: All</p>	<p>a. Employer has documented practices, procedures (including emergency response procedures) and policies to protect employees from workplace hazards and to minimize risk of accident or injury. The information shall be available to employees.</p>	<p>Major</p> <p>1. Docking platform is made from pallets which are not suitable as there is a transfer of products and people onto boats from this platform. No load testing is available to show that the pallets are suitable.</p> <p>2. The second barge is unsafe, the house has been sealed off and the decking is weak. workers have accesses to this unsafe working area.</p> <p>Minor</p> <p>1. Sea taxi personnel stepped onto the barge without the use of a life vest. The site manager did not instruct the contractor to wear a life vest until the auditor pointed out that no life vest was being worn</p> <p>2. Damaged ladder was identified while on a tour of the farm. The new procedure to removed damaged ladders has not identified this damaged ladder.</p>	Major	<p>The two NCs listed as Major were deemed to present significant ongoing risk to farm personnel. The 'Contractor not wearing a life vest' NC was listed as minor as this was the only breach of this nature observed during the farm visits. The 'Damaged ladder' NC was listed as minor as the damage to the ladder did not present serious risk to the farm employees.</p>
		<p>b. Employees know and understand emergency response procedures.</p>	<p>Employees have been trained for emergency response procedures. The training has been recorded and displayed on the employee notice boards.</p>		
		<p>c. Employer conducts health and safety training for all employees on a regular basis (once a year and immediately for all new employees), including training on potential hazards and risk minimization, Occupational Safety and Health (OSH) and effective use of PPE.</p>	<p>Health and safety training is carried by an external company every year. The training covers all potential hazards.</p>		
		<p>d. Others, please describe</p>			
6.5.2	<p>Indicator: Evidence that workers use Personal Protective Equipment (PPE) effectively</p> <p>Requirement: Yes</p> <p>Applicability: All</p>	<p>a. Employer maintains a list of all health and safety hazards (e.g. chemicals).</p>	<p>Full list is available with the health and safety standards documentation.</p>	Compliant	
		<p>b. Employer provides workers with PPE that is appropriate to known health and safety hazards.</p>	<p>All workers are provided with the appropriate PPE.</p>		
		<p>c. Employees receive annual training in the proper use of PPE (see 6.5.1c). For workers who participated in the initial training(s) previously an annual refreshment training may suffice, unless new PPE has been put to use.</p>	<p>All employees are trained in the correct use of PPE and refresher training is provided if required or new equipment is issued.</p>		
		<p>d. Be advised that workers will be interviewed to confirm the above.</p>	<p>Worker confirmed within interview process</p>		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
		e. Others, please describe			
6.5.3	Indicator: Presence of a health and safety risk assessment and evidence of preventive actions taken Requirement: Yes Applicability: All	a. Employer makes regular assessments of hazards and risks in the workplace. Risk assessments are reviewed and updated at least annually (see also 6.5.1a).	Risk assessments are carried by the site manager every year. All reviews are documented. Changes are made sooner if the process changes or new machinery is implemented	Compliant	
		b. Employees are trained in how to identify and prevent known hazards and risks (see also 6.5.1c).	Risk assessments are used to identify the risk and employees are trained against the risk assessments		
		c. Health and safety procedures are adapted based on results from risk assessments (above) and changes are implemented to help prevent accidents.	Health and safety procedures are adapted based on results from risk assessments. Risk assessments are reviewed when changes are made to the processes to avoid potential accidents.		
		d. Others, please describe			
6.5.4	Indicator: Evidence that all health- and safety-related accidents and violations are recorded and corrective actions are taken when necessary Requirement: Yes Applicability: All	a. Employer records all health- and safety-related accidents.	Confirmed through staff interviews.	Compliant	
		b. Employer maintains complete documentation for all occupational health and safety violations and investigations.	Facility records all health- and safety-related accidents. Accidents are investigated by the Health and Safety manager. Monitoring systems have been implemented to review year on year results.		
		c. Employer implements corrective action plans in response to any accidents that occur. Plans are documented and they include an analysis of root cause, actions to address root cause, actions to remediate, and actions to prevent future accidents of similar nature.	Facility has systems to maintain documentation for all occupational health and safety violations and investigations.		
		d. Employees working in departments where accidents have occurred can explain what analysis has been done and what steps were taken or improvements made.	See section 6.5.4a		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
		e. Others, please describe			
6.5.5	Indicator: Evidence of employer responsibility and/or proof of insurance (accident or injury) for 100% of worker costs in a job-related accident or injury when not covered under national law Requirement: Yes Applicability: All	a. Employer maintains documentation to confirm that all personnel are provided sufficient insurance to cover costs related to occupational accidents or injuries (if not covered under national law). Equal insurance coverage must include temporary, migrant or foreign workers. Written contract of employer responsibility to cover accident costs is acceptable evidence in place of insurance.	Employees stated within the interview process that accidents were investigated and steps were taken and improvements made if required.	Compliant	
		b. Others, please describe			
6.5.6	Indicator: Evidence that all diving operations are conducted by divers who are certified Requirement: Yes Applicability: All	a. Employer keeps records of farm diving operations and a list of all personnel involved. In case an external service provider was hired, a statement that provider conformed to all relevant criteria must be made available to the auditor by this provider.	The farm uses an external company to provide divers. There is an assessment carried out to ensure that the company has all of the required documentation. The farm employees check the licenses and health certificates every 6 months. There are also records of each dive and a pre dive checklist is completed prior to any diving.	Compliant	
		b. Employer maintains evidence of diver certification (e.g. copies of certificates) for each person involved in diving operations. Divers shall be certified through an accredited national or international organization for diver certification.	All diving certification was provided. All divers have the required accreditations. Yearly checks on certification is made by Marine Harvest.		
		c. Others, please describe			
Criterion 6.6 Wages					
		a. Employer keeps documents to show the legal minimum wage in the country of operation. If there is no legal minimum wage in the country, the employer keeps documents to show the industry-standard minimum wage.	Wages are recorded on an electronic accounting system and verified. All wages paid are in line or above minimum wage requirements		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
6.6.1	<p>Indicator: The percentage of workers whose basic wage [136] (before overtime and bonuses) is below the minimum wage [137]</p> <p>Requirement: 0 (None)</p> <p>Applicability: All</p>	b. Employer's records (e.g. payroll) confirm that worker's wages for a standard work week (≤ 48 hours) always meet or exceed the legal minimum wage. If there is no legal minimum wage, the employer's records must show how the current wage meets or exceeds industry standard. If wages are based on piece-rate or pay-per-production, the employer's records must show how workers can reasonably attain (within regular working hours) wages that meet or exceed the legal minimum wage.	The payroll records meet or exceed the legal minimum wage. There are no piece rate workers or pay per production workers employed at the site. Employees are paid every second week.	Compliant	
		c. Maintain documentary evidence (e.g. payroll, timesheets, punch cards, production records, and/or utility records) and be advised that workers will be interviewed to confirm the above.	Time sheets are completed by the site manager and signed by the employees to confirm that the working hours are correct.		
		d. Others, please describe			
6.6.2	<p>Indicator: Evidence that the employer is working toward the payment of basic needs wage [138]</p> <p>Requirement: Yes</p> <p>Applicability: All</p>	a. Proof of employer engagement with workers and their representative organizations, and the use of cost of living assessments from credible sources to assess basic needs wages. Includes review of any national basic needs wage recommendations from credible sources such as national universities or government.	Marine Harvest ensures that pay levels are reviewed to ensure that levels are correct. There are details of living wages for BC available which states the living wage is \$16.42	Compliant	
		b. Employer has calculated the basic needs wage for farm workers and has compared it to the basic (i.e. current) wage for their farm workers.	See 6.6.2a		
		c. Employer demonstrates how they have taken steps toward paying a basic needs wage to their workers.	See 6.6.2a		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
		d. Others, please describe			
6.6.3	Indicator: Evidence of transparency in wage-setting and rendering [139] Requirement: Yes Applicability: All	a. Wages and benefits are clearly articulated to workers and documented in contracts.	Marine Harvest ensures that pay levels are reviewed to ensure that levels are correct. There are details of living wages for BC available which states the living wage is \$16.42	Compliant	
		b. The method for setting wages is clearly stated and understood by workers.	See 6.6.2a		
		c. Employer renders wages and benefits in a way that is convenient for the worker (e.g. cash, check, or electronic payment methods). Workers do not have to travel to collect benefits nor do they receive promissory notes, coupons or merchandise in lieu of payment.	See 6.6.2a		
		d. Be advised that workers will be interviewed to confirm the above.	Workers confirmed within interview process that they were aware of the pay and benefits that they are entitled to and this was document within their contracts of employment. Workers confirmed that electronic transfer payments are made bi-weekly. The workers confirmed that the pay slip detailed all wage related information.		
		e. Others, please describe			
Criterion 6.7 Contracts (labor) including subcontracting					
6.7.1	Indicator: Percentage of workers who have contracts [141] Requirement: 100% Applicability: All	a. Employer maintains a record of all employment contracts.	All employees are provided with a contract of employment and a copy of the contract was available within the personnel files.	Compliant	
		b. There is no evidence for labor-only contracting relationships or false apprenticeship schemes.	There was no evidence of Labor only contracts.		
		c. Be advised that workers will be interviewed to confirm the above.	It was confirmed within the employee interviews that no labor only contracts are used and no false apprenticeships are used. It was also noted that no apprenticeship placements roles are currently at the site.		
		d. Others, please describe			
		a. Farm has a policy to ensure that all companies contracted to provide supplies or services (e.g. divers, cleaning, maintenance) have socially responsible practices and policies.	The Code of Conduct states within clauses 1.2 that Contractors must comply with the Code of Conduct, which has includes all social responsible practices and policies.		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
6.7.2	Indicator: Evidence of a policy to ensure social compliance of its suppliers and contractors Requirement: Yes Applicability: All	b. Producing company has criteria for evaluating its suppliers and contractors. The company keeps a list of approved suppliers and contractors.	Marine Harvest has policies and procedures in place to control subcontractors. It starts with a contractor orientation package which includes: Introduction and policies, confidentiality agreement, contractor verification of policy and procedures, employee verification, best management practices, OSH Safe work procedures, saltwater procedures, quality management. Additional Marine Harvest Supplier code of conduct if provided which includes; the requirements to comply with: National Legislation, Human Rights, Labor rights, Health and safety, Anti-Corruption, The environment, Food quality and food safety.	Compliant	
		c. Producing company keeps records of communications with suppliers and subcontractors that relate to compliance with 6.7.2.	Questionnaires for evaluation prior to contracting are implemented also a reviewed list of subcontractors and documentation are kept in conformance with company policies.		
		d. Others, please describe			
Criterion 6.8 Conflict resolution					
6.8.1	Indicator: Evidence of worker access to effective, fair and confidential grievance procedures Requirement: Yes Applicability: All	a. Employer has a clear labor conflict resolution policy for the presentation, treatment, and resolution of worker grievances in a confidential manner.	There is a complaint procedure detailed in the HR Policy which explains the reporting procedure including bullying and harassment and confidentiality policy	Compliant	
		b. Workers are familiar with the company's labor conflict policies and procedures. There is evidence that workers have	All employees have access to policies through the intranet. This was confirmed through employee interviews		
		c. Maintain documentary evidence (e.g. complaint or grievance filings, minutes from review meetings) and be advised that workers will be interviewed to confirm the above.	All communication such as Complaints, grievances and discipline is recorded within the employee personnel file. There communications are detailed in writing with the employee personnel files		
		d. Others, please describe			
	Indicator: Percentage of grievances handled that are addressed [142] within a 90-day timeframe	a. Employer maintains a record of all grievances, complaints and labor conflicts that are raised.	See 6.8.1c		
		b. Employer keeps a record of follow-up (i.e. corrective actions) and timeframe in which grievances are addressed.	The established grievance policy and procedures are well documented. Any grievances that are raised are documented in the employee personnel files and have agreed action plans if required.		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
6.8.2	Requirement: 100% Applicability: All	c. Maintain documentary evidence and be advised that workers will be interviewed to confirm that grievances are addressed within a 90-day timeframe. d. Others, please describe	1. Write down all audit evidence for each compliance criterion (CC). Audit evidence (including evidence of conformity and nonconformity) should be recorded so that the audit can be repeated by a different audit team. 2. Replace explanatory text in the 'Audit Evidence' column as appropriate. 3. If you see any Compliance Criteria which is not listed below, please describe in the blue cells below . None of the workers interviewed had any grievances so unable to confirm. The company policy is to respond to each stage of the process within 14 days.	Compliant	
Criterion 6.9 Disciplinary practices					
6.9.1	Indicator: Incidences of excessive or abusive disciplinary actions Requirement: None Applicability: All	a. Employer does not use threatening, humiliating or punishing disciplinary practices that negatively impact a worker's physical and mental health or dignity. b. Allegations of corporeal punishment, mental abuse [144], physical coercion, or verbal abuse will be investigated by auditors. c. Be advised that workers will be interviewed to confirm there is no evidence for excessive or abusive disciplinary actions. d. Others, please describe	None of of the policy are procedures that are used were threatening, humiliating or have any punishing disciplinary practices. The practice of the disciplinary does not impact the workers physical, mental No evidence or allegations of any abuse was noted during the audit Workers interviews confirmed no issues with excessive or abusive actions.	Compliant	
6.9.2	Indicator: Evidence of a functioning disciplinary action policy whose aim is to improve the worker [143] Requirement: Yes Applicability: All	a. Employer has written policy for disciplinary action which explicitly states that its aim is to improve the worker [143]. b. Maintain documentary evidence (e.g. worker evaluation reports) and be advised that workers will be interviewed to confirm that the disciplinary action policy is fair and effective. c. Others, please describe	The company has written policy disciplinary action that "explicitly" states to improve the worker. The company does have performance management policy so this should be noted alongside the disciplinary policy. None of the workers had been involved with a disciplinary procedure but confirmed workers are regularly evaluated and reviewed.	Compliant	
Criterion 6.10 Working hours and overtime					

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
6.10.1	<p>Indicator: Incidences, violations or abuse of working hours and overtime laws [145]</p> <p>Requirement: None</p> <p>Applicability: All</p>	a. Employer has documentation showing the legal requirements for working hours and overtime in the region where the farm operates. If local legislation allows workers to exceed internationally accepted recommendations (48 regular hours, 12 hours overtime) then requirements of the international standards apply.	Company holds document for Employment Standards Act for BC for working regulations. The working shift pattern is carried out over 2 weeks. The shift patter consists of 8 days on a nd 6 days off. The averaged hours over the 2 week is 40 hours per week.	Compliant	
		b. Records (e.g. time sheets and payroll) show that farm workers do not exceed the number of working hours allowed under the law.	Working hours are provided by site managers to the payroll and working hours department. The workers confirm that working hours are correct prior to this. Records on Time Solutions system show that workers are not exceeding the		
		c. If an employer requires employees to work shifts at the farm (e.g. 10 days on and six days off), the employer compensates workers with an equivalent time off in the calendar month and there is evidence that employees have agreed to this schedule (e.g. in the hiring contract).	The shift pattern is agreed prior to the the commencement of employment. The shift pattern consists of 8 days working a and 6 days off. The average hours over the 2 weeks are 40 hours. The contract of employment clearly stated that working hours.		
		d. Be advised that workers will be interviewed to confirm there is no abuse of working hours and overtime laws.	Workers confirmed that the facility did not abuse the working hours regulations and laws.		
		e. Others, please describe			
6.10.2	<p>Indicator: Overtime is limited, voluntary [146], paid at a premium rate and restricted to exceptional circumstances</p> <p>Requirement: Yes</p> <p>Applicability: All except as noted in [146]</p>	a. Payment records (e.g. payslips) show that workers are paid a premium rate for overtime hours.	Workers are paid premium rate for overtime hours they are paid 150% for the first 2 hours and 200% for any hours worked after that.	Compliant	
		b. Overtime is limited and occurs in exceptional circumstances as evidenced by farm records (e.g. production records, time sheets, and other records of working hours).	Time Solutions System confirmed that overtime is infrequent.		
		c. Be advised that workers will be interviewed to confirm that all overtime is voluntary except where there is a collective bargaining agreement which specifically allows for compulsory overtime.	Workers confirmed that overtime is rare and is voluntary		
		d. Others, please describe			
Criterion 6.11 Education and training					

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
6.11.1	Indicator: Evidence that the company encourages and sometimes supports education initiatives for all workers (e.g., courses, certificates and degrees) Requirement: Yes Applicability: All	a. Company has written policies related to continuing education of workers. Company provides incentives (e.g. subsidies for tuition or textbooks, time off prior to exams, flexibility in work schedule) that encourage workers to participate in educational initiatives. Note that such offers may be contingent on workers committing to stay with the company for a pre-arranged time.	The company encourages employees to increase knowledge and participate in training courses and supports the workers in doing this. As stated in HR policy section 9 Employee training and development bad education assistance programs.	Compliant	
		b. Employer maintains records of worker participation in educational opportunities as evidenced by course documentation (e.g. list of courses, curricula, certificates,	All training records are maintained on the HR database system.		
		c. Be advised that workers will be interviewed to confirm that educational initiatives are encouraged and supported by the company.	Workers confirmed that they are encouraged to learn and be involved with training courses. Other than compulsory health and safety training workers dictate the speed of additional training.		
		d. Others, please describe			
Criterion 6.12 Corporate policies for social responsibility					
6.12.1	Indicator: Demonstration of company-level [148] policies in line with the standards under 6.1 to 6.11 above Requirement: Yes Applicability: All	a. Company-level policies are in line with all social and labor requirements presented in 6.1 through 6.11.	The Code of Conduct Policy and also the HR Policy are in line with all social and labor requirements	Compliant	
		b. Company-level policies (see 6.12.1a) are approved by the company headquarters in the region where the site applying for certification is located.	Corporate policy is approved by the Senior Management Team in Campbell River		
		c. The scope of corporate policies (see 6.12.1a) covers all company operations relating to salmonid production in the region (i.e. all smolt production facilities, grow-out facilities and processing plants).	The scope of all corporate policies cover all company operations.		
		d. The site that is applying for certification provides auditors with access to all company-level policies and procedures as are needed to verify compliance with 6.12.1a (above).	All documentation was provided and reviewed		
		e. Others, please describe			

PRINCIPLE 7: BE A GOOD NEIGHBOR AND CONSCIENTIOUS CITIZEN
Criterion 7.1 Community engagement

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
7.1.1	Indicator: Evidence of regular and meaningful [149] consultation and engagement with community representatives and organizations Requirement: Yes Applicability: All	a. The farm pro-actively arranges for consultations with the local community at least twice every year (bi-annually).	There is a community engagement letter sent to the mayor of each community it covers the direction of the company and initiatives that are being developed. There is an agreement in place with the FN in this area. The name of the first nations group in this area is Tlatlasikwlla Nation . On going consultations are conducted with FN groups and other local stakeholders.	Compliant	
		b. Consultations are meaningful. OPTIONAL: the farm may choose to use participatory Social Impact Assessment (pSIA) or an equivalent method for consultations.	The company recently sent out communication to all the local communities with details on new technology, Therapeutic Treatments, opportunities for future growth and information regarding certification.		
		c. Consultations include participation by representatives from the local community who were asked to contribute to the	The communication included participation of representatives of the local communities and the ability to contribute to the agenda		
		d. Consultations include communication about, or discussion of, the potential health risks of therapeutic treatments (see Indicator 7.1.3).	See 7.1.1b		
		e. Maintain records and documentary evidence (e.g. meeting agenda, minutes, report) to demonstrate that consultations comply with the above.	The community engagement letter states the agenda. Notes are taken during the meetings and follow up emails are sent out to stake holders		
		f. Be advised that representatives from the local community and organizations may be interviewed to confirm the above.	No stakeholders, representatives from the local community requested any form of engagement with the auditors		
		g. Others, please describe			
7.1.2	Indicator: Presence and evidence of an effective [150] policy and mechanism for the presentation, treatment and resolution of complaints by community stakeholders and organizations Requirement: Yes Applicability: All	a. Farm policy provides a mechanism for presentation, treatment and resolution of complaints lodged by stakeholders, community members, and organizations.	MHC have a policy Doc#5/FW905 External Complaint resolution. The policy details the required steps for each stage of the complaint.	Compliant	
		b. The farm follows its policy for handling stakeholder complaints as evidenced by farm documentation (e.g. follow-up communications with stakeholders, reports to stakeholder describing corrective actions).	All external complaints are logged by Director of Public Affairs Ian Roberts. Log details whom raised the complaint and what it is and then details what is carried out until closed off.		
		c. The farm's mechanism for handling complaints is effective based on resolution of stakeholder complaints (e.g. follow-up correspondence from stakeholders).	The company policy is all complaints are passed to the communications manager and then forwarded to senior management should it be required. The complaints procedure is detailed and sets out the requirements for handling each complaint		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
		d. Be advised that representatives from the local community, including complainants where applicable, may be interviewed to confirm the above.	No stakeholders, representatives from the local community requested any form of engagement with the auditors		
		e. Others, please describe			
7.1.3	Indicator: Evidence that the farm has posted visible notice [151] at the farm during times of therapeutic treatments and has, as part of consultation with communities under 7.1.1, communicated about potential health risks from treatments Requirement: Yes Applicability: All	a. Farm has a system for posting notifications at the farm during periods of therapeutic treatment. (use of anaesthetic baths is not regarded a therapeutic)	Notices are posted on the site if Therapeutic Treatments are being carried out. The signage that is used was seen during the farm inspection. The signage used is clear and can be seen by anyone passing the farm.	Compliant	
		b. Notices (above) are posted where they will be visible to affected stakeholders (e.g. posted on waterways for fishermen who pass by the farm).	Notices are posted on the side farm house, so it can be seen by anyone entering the site.		
		c. Farm communicates about the potential health risks from treatments during community consultations (see 7.1.1)	This has been communicated in the engagement letter as detailed 7.1.1b		
		d. Be advised that members of the local community may be interviewed to confirm the above.	No stakeholders, representatives from the local community requested any form of engagement with the auditors		
		e. Others, please describe			
Criterion 7.2 Respect for indigenous and aboriginal cultures and traditional territories					
7.2.1	Indicator: Evidence that indigenous groups were consulted as required by relevant local and/or national laws and regulations Requirement: Yes Applicability: All farms that operate in indigenous territories or in proximity to indigenous or aboriginal people [152]	a. Documentary evidence establishes that the farm does or does not operate in an indigenous territory (to include farms that operate in proximity to indigenous or aboriginal people [152]). If not then the requirements of 7.2.1 do not apply.	MHC are operating in some indigenous territories; the Hope Island tenures are held by the Tlatlasikwala First Nation and operated by Marine Harvest under a formal protocol agreement.	Compliant	
		b. Farm management demonstrates an understanding of relevant local and/or national laws and regulations that pertain to consultations with indigenous groups.	The agreements demonstrate that MHC are aware of Local/national laws and regulations for each FN group.		
		c. As required by law in the jurisdiction: - farm consults with indigenous groups and retains documentary evidence (e.g. meeting minutes, summaries) to show how the process complies with 7.2.1b; OR - farm confirms that government-to-government consultation occurred and obtains documentary evidence.	There is a spreadsheet detailing agreements with each FN. There is also a log sheet that records all meetings/calls and communication.		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
		d. Be advised that representatives from indigenous groups may be interviewed to confirm the above.	No indigenous representatives were interviewed		
		e. Others, please describe			
7.2.2	Indicator: Evidence that the farm has undertaken proactive consultation with indigenous communities Requirement: Yes [152] Applicability: All farms that operate in indigenous territories or in proximity to indigenous or aboriginal people [152]	a. See results of 7.2.1a (above) to determine whether the requirements of 7.2.2 apply to the farm.	MHC are operating the site under a formal agreement with the Tlatlasikwala First Nation	Compliant	
		b. Be advised that representatives from indigenous communities may be interviewed to confirm that the farm has undertaken proactive consultations.	No indigenous groups requested any form of engagement with the auditors		
		c. Others, please describe			
7.2.3	Indicator: Evidence of a protocol agreement, or an active process [153] to establish a protocol agreement, with indigenous communities Requirement: Yes Applicability: All farms that operate in indigenous territories or in proximity to indigenous or aboriginal people [152]	a. See results of 7.2.1a (above) to determine whether the requirements of 7.2.3 apply to the farm.	A protocol agreement is in place between MHC and the Tlatlasikwala First Nation.	Compliant	
		b. Maintain evidence to show that the farm has either: 1) reached a protocol agreement with the indigenous community and this fact is documented; or 2) continued engagement in an active process [153] to reach a protocol agreement with the indigenous community.	There are agreements in place as detailed in 7.2.1a and continuous engagements as detailed 7.2.1c		
		c. Be advised that representatives from indigenous communities may be interviewed to confirm either 7.2.3b1 or b2 (above) as applicable.	No indigenous groups requested any form of engagement with the auditors		
		d. Others, please describe			

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
<i>Criterion 7.3 Access to resources</i>					
7.3.1	Indicator: Changes undertaken restricting access to vital community resources [154] without community approval Requirement: None Applicability: All	a. Resources that are vital [155] to the community have been documented and are known by the farm (i.e. through the assessment process required under Indicator 7.3.2).	As detailed in CEAA screening report MHC do not have exclusive use of the location the farms are located in.	Compliant	
		b. The farm seeks and obtains community approval before undertaking changes that restrict access to vital community resources. Approvals are documented.	There is no restriction of access and report notes Tlatlasikwlla Nation no issues with the use of the location.		
		c. Be advised that representatives from the community may be interviewed to confirm that the farm has not restricted access to vital resources without prior community approval.	No stakeholders, representatives from the local community requested any form of engagement with the auditors		
		d. Others, please describe			
7.3.2	Indicator: Evidence of assessments of company's impact on access to resources Requirement: Yes Applicability: All	a. There is a documented assessment of the farm's impact upon access to resources. Can be completed as part of community consultations under 7.1.1.	The CEAA report for the site includes consultation with FN , local community and government. It is noted in the report that FN have no issues with license application.	Compliant	
		b. Be advised that representatives from the community may be interviewed to generally corroborate the accuracy of conclusions presented in 7.3.2a.	No stakeholders, representatives from the local community requested any form of engagement with the auditors		
		c. Others, please describe			
INDICATORS AND STANDARDS FOR SMOLT PRODUCTION					
SECTION 8: STANDARDS FOR SUPPLIERS OF SMOLT					
<i>Standards related to Principle 1</i>					
		a. Identify all of the farm's smolt suppliers. For each supplier, identify the type of smolt production system used (e.g. open, semi or closed systems) and submit this information to ASC (Appendix VI).	Smolt suppliers are all MH Canada Ocean Falls and Dalrymple		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
8.1	<p>Indicator: Compliance with local and national regulations on water use and discharge, specifically providing permits related to water quality</p> <p>Requirement: Yes</p> <p>Applicability: All Smolt Producers</p>	b. Where legal authorisation related to water quality are required, obtain copies of smolt suppliers' permits.	<p>Dalrymple Authorisation number 7802 covering a range of indicators including total ammonia, soluble phosphate, total suspended solids, total nitrogen and BOD. Random sampling of indicators from returns indicate compliance however there are comments on the 'quarantine hatchery', as this is not required to be used the minimal flow of water at discharge results in a higher concentration of 'contaminants' than would be present if the water flow was run as if the facility were in use. The Standard production values are noted to be well within compliance. A letter dated 3rd April 2014 to Sharon DeDominicis (MHC Director of Environmental Performance and Certification) from the Ministry of the Environment (Conrad Berube) confirms the governments acceptance of the position and notes the move towards recirculation units will result in improved results.</p> <p>Ocean Falls Authorisation number 17135 controlling document is the Environmental Management act (Land based finfish waste control regulation BC Reg 68/94 o.c.276/94) Which determines total Phosphorous and 'non-filtrable residue' to be the indicators, monthly monitoring with annual reporting confirmed.</p>	Compliant	
		c. Obtain records from smolt suppliers showing monitoring and compliance with discharge laws, regulations, and permit requirements as required.	<p>Fisheries & Oceans Canada Facility reference 47 - Dalrymple - Licence no. AQFW 112571 2015 expiry June 18th 2024. BC Provincial Aquaculture Licence PR083 expiry 30th June 2017.</p> <p>Fisheries & Oceans Canada Facility Reference 1689 - Ocean Falls - Licence no. AQFW 112568 2015 Expiry June 18th 2024 BC Provincial Aquaculture Licence 5406670 expiry 30th June 2027.</p>		
		-	Smolt producing Farm is part of Marine Harvest Canada		
		e. Others, please describe			
8.2	<p>Indicator: Compliance with labor laws and regulations</p> <p>Requirement: Yes</p> <p>Applicability: All Smolt Producers</p>	a. Obtain declarations from smolt suppliers affirming compliance with labor laws and regulations.	Smolt producing Farm is part of Marine Harvest Canada	Compliant	
		b. Keep records of supplier inspections for compliance with national labor laws and codes (only if such inspections are legally required in the country of operation; see 1.1.3a)	Smolt producing Farm is part of Marine Harvest Canada		
		c. Others, please describe			

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
<i>Standards related to Principle 2</i>					
8.3	<p>Indicator: Evidence of an assessment of the farm’s potential impacts on biodiversity and nearby ecosystems that contains the same components as the assessment for grow-out facilities under 2.4.1</p> <p>Requirement: Yes</p> <p>Applicability: All Smolt Producers</p>	a. Obtain from the smolt supplier(s) a documented assessment of the smolt site's potential impact on biodiversity and nearby ecosystems. The assessment must address all components outlined in Appendix I-3.	Carried out Mainstream Biological Consulting for MH Canada November 2014 Ocean Falls and Dalrymple hatcheries. Shift to recirculation units from flow-through confirmed by BC Ministry of Environment to be a reduction of environmental impact. Plan to realign with this method of production stated to be ongoing.	Compliant	
		b. Obtain from the smolt supplier(s) a declaration confirming they have developed and are implementing a plan to address potential impacts identified in the assessment.	Confirmed to have been completed January 2015 (Site Manager Ken Madison email). Previous plan will effectively be superceded by Dalrymple by site improvement plans and once completed the plan will be reviewed again. Prior to works starting potential impacts were considered within planning application.		
		c. Others, please describe			
8.4	<p>Indicator: Maximum total amount of phosphorus released into the environment per metric ton (mt) of fish produced over a 12-month period (see Appendix VIII-1)</p> <p>Requirement: 5 kg/mt of fish produced over a 12-month period; within three years of publication of the SAD standards, 4 kg/mt of fish produced over a 12-month period</p> <p>Applicability: All Smolt Producers</p>	a. Obtain records from smolt suppliers showing amount and type of feeds used for smolt production during the past 12	Confirmed on MHC aquafarmer database	Minor	
		b. For all feeds used by the smolt suppliers (result from 8.4a), keep records showing phosphorus content as determined by chemical analysis or based on feed supplier declaration (Appendix VIII-1).	Feed supplied by Skretting Canada (XT range) in the main with a small percentage from Skretting France (SP range)		
		c. Using the equation from Appendix VIII-1 and results from 8.4a and b, calculate the total amount of phosphorus added as feed during the last 12 months of smolt production.	Total Phosphorous in feed calculated for Dalrymple as 3.21 metric tonnes (1.4% of feed fed as an average across the content for feed sizes used) Total Phosphorous in feed calculated for Ocean Falls as 1.95 metric tonnes (1.4% of feed fed as an average across the content for feed sizes used)		
		d. Obtain from smolt suppliers records for stocking, harvest and mortality which are sufficient to calculate the amount of biomass produced (formula in Appendix VIII-1) during the past 12 months.	Total Biomass produced calculated for Dalrymple as 401.5 metric tonnes Total Biomass produced calculated for Ocean Falls as 479.9 metric tonnes		
		e. Calculate the amount of phosphorus in fish biomass produced (result from 8.4d) using the formula in Appendix VIII-	Total Phosphorous in fish Biomass for Dalrymple calculated as 1.76 metric tonnes Total Phosphorous in fish Biomass for Ocean Falls calculated as 2.06 metric		
		f. If applicable, obtain records from smolt suppliers showing the total amount of P removed as sludge (formula in Appendix VIII-1) during the past 12 months.	Total Phosphorous removed as sludge (Dalrymple) is stated as exceptionally high and is a artefact of the lack of recent sludge tank emptying prior to the audit resulting in this value (i.e. sludge removed was generated by previous populations of fish as well as the recent cohort. Total Phosphorous removed as sludge (Ocean Falls) is zero as discharge is direct to sea		

	<p style="text-align: center;">Compliance Criteria (Use as guidance for audit only)</p>	<p style="text-align: center;">Audit evidence</p> <p>1. Write down all audit evidence for each compliance criterion (CC). Audit evidence (including evidence of conformity and nonconformity) should be recorded so that the audit can be repeated by a different audit team. 2. Replace explanatory text in the 'Audit Evidence' column as appropriate. 3. If you see any Compliance Criteria which is not listed below, please describe in the blue cells below.</p>	<p style="text-align: center;">Evaluation (Per indicator, select one category in the drop-down menu)</p>	<p style="text-align: center;">Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability</p>	
	<p>Applicability: All Smolt Producers</p>	<p>g. Using the formula in Appendix VIII-1 and results from 8.4a-f (above), calculate total phosphorus released per ton of smolt produced and verify that the smolt supplier is in compliance with requirements.</p> <p>h. Others, please describe</p>	<p>Calculated total phosphorous discharge for Ocean Falls is 1.27 kgs/metric tonne of smolt produced</p> <p>8.4 - The calculated value for phosphorous released for the Dalrymple site is inaccurate, being artificially low due to the sludge calculation being inaccurate. Estimated extrapolated calculation using correct methodology at audit however also gives compliant figures.</p>		<p>8.4g - The calculation was inaccurate however an estimate by the auditor of sludge removal was calculated to result in compliance with the criterion</p>
<p>Standards related to Principle 3</p>					
<p>8.5</p>	<p>Indicator: If a non-native species is being produced, the species shall have been widely commercially produced in the area prior to the publication [156] of the SAD standards</p> <p>Requirement: Yes [157]</p> <p>Applicability: All Smolt Producers except as noted in [157]</p>	<p>a. Obtain written evidence showing whether the smolt supplier produces a non-native species or not. If not, then Indicator 8.5 does not apply.</p> <p>b. Provide the farm with documentary evidence that the non-native species was widely commercially produced in the area before publication of the SAD Standard. (See definition of area under 3.2.1).</p> <p>c. If the smolt supplier cannot provide the farm with evidence for 8.5b, provide documentary evidence that the farm uses only 100% sterile fish.</p> <p>d. If the smolt supplier cannot provide the farm with evidence for 8.5b or 8.5c, provide documented evidence for each of the following: 1) non-native species are separated from wild fish by effective physical barriers that are in place and well maintained; 2) barriers ensure there are no escapes of reared fish specimens that might survive and subsequently reproduce; and 3) barriers ensure there are no escapes of biological material that might survive and subsequently reproduce.</p> <p>e. Retain evidence as described in 8.5a-d necessary to show compliance of each facility supplying smolt to the farm.</p> <p>f. Others, please describe</p>	<p>Atlantic Salmon are a non-native species to West Coast Canada</p> <p>Government website (DFO) states Atlantic Salmon were introduced @1985 from West Coast Scotland origin.</p> <p>N/A Fish are standard production fish</p> <p>Confirmed at audit.</p> <p>All suppliers internal.</p>	<p>Compliant</p>	
		<p>a. Obtain documentary evidence to show that smolt suppliers maintained monitoring records of all incidences of confirmed or suspected escapes, specifying date, cause, and estimated number of escapees.</p>	<p>Smolt supply farms are Recirculation units, minimal risk of escape. No Escapes reported or suspected.</p>		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
8.6	Indicator: Maximum number of escapees [158] in the most recent production cycle Requirement: 300 fish [159] Applicability: All Smolt Producers except as noted in [159]	b. Using smolt supplier records from 8.6a, determine the total number of fish that escaped. Verify that there were fewer than 300 escapees from the smolt production facility in the most recent production cycle.	Dalrymple is a Recirculation unit, minimal risk of escape. Ocean Falls is a flow through, all discharges are triple screened to prevent fish escape. No Escapes reported or suspected.	Compliant	
		c. Inform smolt suppliers in writing that monitoring records described in 8.6a must be maintained for at least 10 years beginning with the production cycle for which the farm is first applying for certification (necessary for farms to be eligible to apply for the exception noted in [159]).	Dalrymple is a Recirculation unit, minimal risk of escape. Ocean Falls is a flow through, all discharges are triple screened to prevent fish escape. No Escapes reported or suspected. DFO website holds records from 2011, previous to this reports are available internally supporting the statement.		
		d. If an escape episode occurs at the smolt production facility (i.e. an incident where > 300 fish escaped), the farm may request a rare exception to the Standard [159]. Requests must provide a full account of the episode and must document how the smolt producer could not have predicted the events that caused the escape episode.	Dalrymple is a Recirculation unit, minimal risk of escape. Ocean Falls is a flow through, all discharges are triple screened to prevent fish escape. No Escapes reported or suspected.		
		e. Others, please describe			
8.7	Indicator: Accuracy [160] of the counting technology or counting method used for calculating the number of fish Requirement: ≥98% Applicability: All Smolt Producers	a. Obtain records showing the accuracy of the counting technology used by smolt suppliers. Records must include copies of spec sheets for counting machines and common estimates of error for hand-counts.	Document FW 269 covers counting (Smolt Inventory control) and specifies the < or = 2% anticipated counter accuracy, this is supported by supplier documentation. Aquascan counters were mostly used on the well boats with hatcheries using Vaki counters.	Compliant	
		b. Review records to verify that accuracy of the smolt supplier's counting technology or counting method is ≥ 98%.	Counter accuracy from records works out at -0.48% for 2015, on the only occasions when the values were outside the 2% anticipated accuracy was recorded as being due to poor weather conditions.		
		c. Others, please describe			
Standards related to Principle 4					
8.8	Indicator: Evidence of a functioning policy for proper and responsible treatment of non-biological waste from production (e.g., disposal and recycling) Requirement: Yes	a. From each smolt supplier obtain a policy which states the supplier's commitment to proper and responsible treatment of non-biological waste from production. It must explain how the supplier's policy is consistent with best practice in the area of operation.	Materials storage, handling and waste disposal plan in Document FW 963 covers required elements including e.g. procedure for disposal of expired feed.	Compliant	

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
	Applicability: All Smolt Producers	b. Others, please describe			
8.9	Indicator: Presence of an energy-use assessment verifying the energy consumption at the smolt production facility (see Appendix V subsection 1 for guidance and required components of the records and assessment) Requirement: Yes, measured in kilojoule/mt fish/production cycle Applicability: All Smolt Producers	a. Obtain records from the smolt supplier for energy consumption by source (fuel, electricity) at the supplier's facility throughout each year.	Energy consumption for Smolt suppliers held internally	Compliant	
		b. Confirm that the smolt supplier calculates total energy consumption in kilojoules (kj) during the last year.	Calculations confirmed for Dalrymple 15,580 mj Ocean Falls 11,308 mj		
		c. Obtain records to show the smolt supplier calculated the total weight of fish in metric tons (mt) produced during the last	Calculations confirmed for Dalrymple 402 mt Ocean Falls 480 mt		
		d. Confirm that the smolt supplier used results from 8.9b and 8.9c to calculate energy consumption on the supplier's facility as required and that the units are reported as kilojoule/mt fish/production cycle.	Calculations confirmed for Dalrymple 38,800 mj/mt Ocean Falls 23,560 kj/mt		
		e. Obtain evidence to show that smolt supplier has undergone an energy use assessment in compliance with requirements of Appendix V-1. Can take the form of a declaration detailing a-e.	Energy consumption for Smolt suppliers held internally, values shown.		
		f. Others, please describe			
8.10	Indicator: Records of greenhouse gas (GHG [161]) emissions [162] at the smolt production facility and evidence of an annual GHG assessment (See Appendix V, subsection 1) Requirement: Yes Applicability: All Smolt Producers	a. Obtain records of greenhouse gas emissions from the smolt supplier's facility.	GHG figures for Smolt suppliers held internally, values shown.	Compliant	
		b. Confirm that, on at least an annual basis, the smolt supplier calculates all scope 1 and scope 2 GHG emissions in compliance with Appendix V-1.	GHG figures for Smolt suppliers held internally, values shown.		
		c. For GHG calculations, confirm that the smolt supplier selects the emission factors which are best suited to the supplier's operation. Confirm that the supplier documents the source of the emissions factors.	Confirmed on examination of figures provided.		
		d. For GHG calculations involving conversion of non-CO2 gases to CO2 equivalents, confirm that the smolt suppliers specify the Global Warming Potential (GWP) used and its source.	GWP figures calculated using the UK Government factors for Company reporting 2013.		
		e. Obtain evidence to show that the smolt supplier has undergone a GHG assessment in compliance with requirements Appendix V-1 at least annually.	Carried out as part of the company ASC processes.		
		f. Others, please describe			

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
<i>Standards related to Principle 5</i>					
8.11	Indicator: Evidence of a fish health management plan, approved by the designated veterinarian, for the identification and monitoring of fish diseases and parasites Requirement: Yes Applicability: All Smolt Producers	a. Obtain a copy of the supplier's fish health management plan for the identification and monitoring of fish disease and parasites.	FHMP is a MH Canada document and is available for each Freshwater site	Compliant	
		b. Keep documentary evidence to show that the smolt supplier's health plans were approved by the supplier's designated veterinarian.	Company vet is Diane Morrison who signs of company FHMP which links into the company fish health reporting system.,		
		c. Others, please describe			
8.12	Indicator: Percentage of fish that are vaccinated for selected diseases that are known to present a significant risk in the region and for which an effective vaccine exists [163] Requirement: 100% Applicability: All Smolt Producers	a. Maintain a list of diseases that are known to present a significant risk in the region, developed by farm veterinarian and supported by scientific evidence.	This is contained in the Fish Health Management plan.	Compliant	
		b. Maintain a list of diseases for which effective vaccines exist for the region, developed by the farm veterinarian and supported by scientific evidence.	Vaccines available are overseen by the company vet.		
		c. Obtain from the smolt supplier(s) a declaration detailing the vaccines the fish received.	All transferred fish are vaccinated with Apex-IHN, Renogen and Forte Micro		
		d. Demonstrate, using the lists from 8.12a-c above, that all salmon on the farm received vaccination against all selected diseases known to present a significant risk in the regions for which an effective vaccine exists.	IHN, Furunculosis, Vibrio and BKD are considered to be the major risks and these are covered by the vaccinations delivered above.		
		e. Others, please describe			
	Indicator: Percentage of smolt groups [164] tested for select	a. Obtain from the smolt supplier a list of diseases of regional concern for which smolt should be tested. List shall be supported by scientific analysis as described in the Instruction	Government identified list of six Viral, two bacterial and two protozoan pathogens.		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
8.13	diseases of regional concern prior to entering the grow-out phase on farm Requirement: 100% Applicability: All Smolt Producers	b. Obtain from the smolt supplier(s) a declaration and records confirming that each smolt group received by the farm has been tested for the diseases in the list (8.13a).	Above pathogens are tested to the 'schedule 2' requirements prior to moving smolts between fish health zones, i.e. from Ocean Falls. These results are available. Transfer permits signed by DFO are available for fish transferred within zone, i.e. Dalrymple, these permits are only granted after DFO has verified health status of fish. Permits were available on site	Compliant	
		c. Others, please describe			
8.14	Indicator: Detailed information, provided by the designated veterinarian, of all chemicals and therapeutants used during the smolt production cycle, the amounts used (including grams per ton of fish produced), the dates used, which group of fish were treated and against which diseases, proof of proper dosing and all disease and pathogens detected on the site Requirement: Yes Applicability: All Smolt Producers	a. Obtain from the smolt supplier(s) a detailed record of all chemical and therapeutant use for the fish sold to the farm that is signed by their veterinarian and includes: - name of the veterinarian prescribing treatment; - product name and chemical name; - reason for use (specific disease) - date(s) of treatment; - amount (g) of product used; - dosage; - mt of fish treated; - the WHO classification of antibiotics (also see note under 5.2.8); and - the supplier of the chemical or therapeutant.	All such treatments are recorded in the Aquafarmer database with required categories listed.	Compliant	
		b. Others, please describe			
8.15	Indicator: Allowance for use of therapeutic treatments that include antibiotics or chemicals that are banned [165] in any of the primary salmon producing or importing countries [166] Requirement: Yes Applicability: All Smolt Producers	a. Provide to the smolt supplier the list (see 5.2.2a) of therapeutants, including antibiotics and chemicals, that are proactively banned for use in food fish for the primary salmon producing and importing countries listed in [166].	All potential treatments are overseen by the company vet Diane Morrison who is aware of the requirements.	Compliant	
		b. Inform smolt supplier that the treatments on the list cannot be used on fish sold to a farm with ASC certification.	Controlled internally.		
		c. Compare therapeutant records from smolt supplier (8.14) to the list (8.15a) and confirm that no therapeutants appearing on the list (8.15a) were used on the smolt purchased by the farm.	Control of therapeutants is all internal, logged within Aquafarmer.		
		d. Others, please describe			
8.16	Indicator: Number of treatments of antibiotics over the most recent production cycle	a. Obtain from the smolt supplier records of all treatments of antibiotics (see 8.14a).	Smolt suppliers are all MH Canada Ocean Falls and Dalrymple, internal.	Compliant	
		b. Calculate the total number of treatments of antibiotics from their most recent production cycle.	Smolt suppliers are all MH Canada Ocean Falls and Dalrymple, internal.		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
	Requirement: ≤ 3 Applicability: All Smolt Producers	c. Others, please describe			
8.17	Indicator: Allowance for use of antibiotics listed as critically important for human medicine by the WHO [167] Requirement: None [168] Applicability: All Smolt Producers	a. Provide to smolt supplier(s) a current version of the WHO list of antimicrobials critically and highly important for human health [167].	Smolt suppliers are all MH Canada Ocean Falls and Dalrymple, internal.	Compliant	
		b. Inform smolt supplier that the antibiotics on the WHO list (8.17a) cannot be used on fish sold to a farm with ASC certification.	Smolt suppliers are all MH Canada Ocean Falls and Dalrymple, internal.		
		c. Compare smolt supplier's records for antibiotic usage (8.14, 8.15a) with the WHO list (8.17a) to confirm that no antibiotics listed as critically important for human medicine by the WHO were used on fish purchased by the farm.	Smolt suppliers are all MH Canada Ocean Falls and Dalrymple, internal.		
		d. Others, please describe			
8.18	Indicator: Evidence of compliance [169] with the OIE Aquatic Animal Health Code [170] Requirement: Yes Applicability: All Smolt Producers	a. Provide the smolt supplier with a current version of the OIE Aquatic Animal Health Code (or inform the supplier how to access it from the internet).	Smolt suppliers are all MH Canada Ocean Falls and Dalrymple, internal.	Compliant	
		b. Inform the supplier that an ASC certified farm can only source smolt from a facility with policies and procedures that ensure that its smolt production practices are compliant with the OIE Aquatic Animal Health Code.	N/A as internally supplied, MHC policies apply.		
		c. Obtain a declaration from the supplier stating their intent to comply with the OIE code and copies of the smolt suppliers policies and procedures that are relevant to demonstrate compliance with the OIE Aquatic Animal Health Code.	N/A as internally supplied, MHC policies apply.		
		d. Others, please describe			
Standards related to Principle 6					
8.19	Indicator: Evidence of company-level policies and procedures in line with the labor standards under 6.1 to 6.11 Requirement: Yes Applicability: All Smolt Producers	a. Obtain copies of smolt supplier's company-level policies and procedures and a declaration of compliance with the labor standards under 6.1 to 6.11.	All smolts are supplied internally.	Compliant	
		b. Review the documentation and declaration from 8.19a to verify that smolt supplier's policies and procedures are in compliance with the requirements of labor standards under 6.1 to 6.11.	All smolts are supplied internally.		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
		c. Others, please describe			
<i>Standards related to Principle 7</i>					
8.20	Indicator: Evidence of regular consultation and engagement with community representatives and organizations Requirement: Yes Applicability: All Smolt Producers	a. From each smolt supplier obtain documentary evidence of consultations and engagement with the community.	All smolts are supplied internally.	Compliant	
		b. Review documentation from 8.20a to verify that the smolt supplier's consultations and community engagement complied with requirements.	All smolts are supplied internally.		
		c. Others, please describe			
8.21	Indicator: Evidence of a policy for the presentation, treatment and resolution of complaints by community stakeholders and organizations Requirement: Yes Applicability: All Smolt Producers	a. Obtain a copy of the smolt supplier's policy for presentation, treatment and resolution of complaints by community stakeholders and organizations.	All smolts are supplied internally.	Compliant	
		b. Others, please describe			
8.22	Indicator: Where relevant, evidence that indigenous groups were consulted as required by relevant local and/or national laws and regulations Requirement: Yes Applicability: All Smolt Producers	a. Obtain documentary evidence showing that the smolt supplier does or does not operate in an indigenous territory (to include farms that operate in proximity to indigenous or aboriginal people (see Indicator 7.2.1). If not then the requirements of 8.22 do not apply.	All smolts are supplied internally.	Compliant	
		b. Obtain documentation to demonstrate that, as required by law in the jurisdiction: smolt supplier consulted with indigenous groups and retains documentary evidence (e.g. meeting minutes, summaries) to show how the process complies with 7.2.1b; OR smolt supplier confirms that government-to-government consultation occurred and obtains documentary	All smolts are supplied internally.		
		c. Others, please describe			

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
8.23	Indicator: Where relevant, evidence that the farm has undertaken proactive consultation with indigenous communities Requirement: Yes Applicability: All Smolt Producers	a. See results of 8.22a (above) to determine whether the requirements of 8.23 apply to the smolt supplier.	All smolts are supplied internally.	Compliant	
		b. Where relevant, obtain documentary evidence that smolt suppliers undertake proactive consultations with indigenous communities.	All smolts are supplied internally.		
		c. Others, please describe			
ADDITIONAL REQUIREMENTS FOR OPEN (NET-PEN) PRODUCTION OF SMOLT					
8.24	Indicator: Allowance for producing or holding smolt in net pens in water bodies with native salmonids Requirement: None Applicability: All Smolt Producers Using Open Systems	a. Obtain a declaration from the farm's smolt supplier stating whether the supplier operates in water bodies with native salmonids.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body	N/A	
		b. Request smolt suppliers to identify all water bodies in which they operate net pens for producing smolt and from which facilities they sell to the client.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body		
		c. For any water body identified in 8.24b as a source of smolt for the farm, determine if native salmonids are present by doing a literature search or by consulting with a reputable authority. Retain evidence of search results.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body		
		d. Others, please describe			
8.25	Indicator: Allowance for producing or holding smolt in net pens in any water body Requirement: Permitted until five years from publication of the SAD standards (i.e. full compliance by June 13, 2017) Applicability: All Smolt Producers Using Open Systems	a. Take steps to ensure that by June 13, 2017 the farm does not source smolt that was produced or held in net pens.	N/A all smolts are produced in Recirculation units	N/A	
		b. Others, please describe			

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
8.26	<p>Indicator: Evidence that carrying capacity (assimilative capacity) of the freshwater body has been established by a reliable entity [171] within the past five years [172, and total biomass in the water body is within the limits established by that study (see Appendix VIII-5 for minimum requirements)</p> <p>Requirement: Yes</p> <p>Applicability: All Smolt Producers Using Open Systems</p>	a. For the water body(s) where the supplier produces smolt for the client (see 8.24b), obtain a copy of the most recent assessment of assimilative capacity.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body	N/A	
		b. Identify which entity was responsible for conducting the assessment (8.26a) and obtain evidence for their reliability.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body		
		c. Review the assessment (8.26a) to confirm that it establishes a carrying capacity for the water body, it is less than five years old, and it meets the minimum requirements presented in Appendix VIII-5.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body		
		d. Review information to confirm that the total biomass in the water body is within the limits established in the assessment (8.26a).	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body		
		e. If the study in 8.26a is more than two years old and there has been a significant increase in nutrient input to the water body since completion, request evidence that an updated assessment study has been done.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body		
		f. Others, please describe			
8.27	<p>Indicator: Maximum baseline total phosphorus concentration of the water body (see Appendix VIII-6)</p> <p>Requirement: ≤ 20 µg/l [174]</p> <p>Applicability: All Smolt Producers Using Open Systems</p>	a. Obtain documentary evidence to show that smolt suppliers conducted water quality monitoring in compliance with the requirements of Appendix VIII-6.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body	N/A	
		b. Obtain from smolt suppliers a map with GPS coordinates showing the sampling locations.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body		
		c. Obtain from smolt suppliers the TP monitoring results for the past 12 months and calculate the average value at each sampling station.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body		
		d. Compare results to the baseline TP concentration established below (see 8.29) or determined by a regulatory body.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body		
		e. Confirm that the average value for TP over the last 12 months did not exceed 20 µg/l at any of the sampling stations nor at the reference station.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
		f. Others, please describe			
8.28	Indicator: Minimum percent oxygen saturation of water 50 centimeters above bottom sediment (at all oxygen monitoring locations described in Appendix VIII-6) Requirement: ≥ 50% Applicability: All Smolt Producers Using Open Systems	a. Obtain evidence that smolt supplier conducted water quality monitoring in compliance with the requirements (see 8.27a).	N/A all smolts are produced in Recirculation units	N/A	
		b. Obtain from smolt suppliers the DO monitoring results from all monitoring stations for the past 12 months.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body		
		c. Review results (8.28b) to confirm that no values were below the minimum percent oxygen saturation.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body		
		d. Others, please describe			
8.29	Indicator: Trophic status classification of water body remains unchanged from baseline (see Appendix VIII-7) Requirement: Yes Applicability: All Smolt Producers Using Open Systems	a. Obtain documentary evidence from the supplier stating the trophic status of water body if previously set by a regulator body (if applicable).	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body	N/A	
		b. If the trophic status of the waterbody has not been classified (see 8.29a), obtain evidence from the supplier to show how the supplier determined trophic status based on the concentration of TP.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body		
		c. As applicable, review results from 8.29b to verify that the supplier accurately assigned a trophic status to the water body in accordance with the table in Appendix VIII-7 and the observed concentration of TP over the past 12 months.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body		
		d. Compare the above results (8.29c) to trophic status of the water body as reported for all previous time periods. Verify that there has been no change.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body		
		e. Others, please describe			
8.30	Indicator: Maximum allowed increase in total phosphorus concentration in lake from baseline (see Appendix VIII-7) Requirement: 25% Applicability: All Smolt Producers	a. Determine the baseline value for TP concentration in the water body using results from either 8.29a or 8.29b as	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body	N/A	
		b. Compare the baseline TP concentration (result from 8.30a) to the average observed TP concentration over the past 12 months (result from 8.27e).	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body		
		c. Verify that the average observed TP concentration did not increase by more than 25% from baseline TP concentration.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body		

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
	Using Open Systems	d. Others, please describe			
8.31	Indicator: Allowance for use of aeration systems or other technological means to increase oxygen levels in the water body Requirement: None Applicability: All Smolt Producers Using Open Systems	a. Obtain a declaration from the farm's smolt supplier stating that the supplier does not use aeration systems or other technological means to increase oxygen levels in the water bodies where the supplier operates.	N/A Dalrymple smolts are produced in a recirculation unit, Ocean Falls smolts are not produced in a natural water body	N/A	
		b. Others, please describe			
ADDITIONAL REQUIREMENTS FOR SEMI-CLOSED AND CLOSED PRODUCTION OF SMOLTS					
8.32	Indicator: Water quality monitoring matrix completed and submitted to ASC (see Appendix VIII-2) Requirement: Yes [177] Applicability: All Smolt Producers Using Semi-Closed or Closed Production Systems	a. Obtain records from smolt suppliers showing that water quality monitoring was conducted at least quarterly (i.e. once every 3 months) over the last 12 months.	As included in the ASC submission.	Compliant	
		b. Obtain water quality monitoring matrix from smolt suppliers and review for completeness.	As included in the ASC submission.		
		c. Submit the smolt supplier's water quality monitoring matrix to ASC as per Appendix VIII-2 and Appendix VI at least once per year.	As included in the ASC submission.		
		d. Others, please describe			
8.33	Indicator: Minimum oxygen saturation in the outflow (methodology in Appendix VIII-2) Requirement: 60% [178,179] Applicability: All Smolt Producers Using Semi-Closed or Closed Production Systems	a. Obtain the water quality monitoring matrix from each smolt supplier (see 8.32b).	As included in the ASC submission.	Compliant	
		b. Review the results (8.33a) for percentage dissolved oxygen saturation in the effluent to confirm that no measurements fell below 60% saturation.	As included in the ASC submission.		
		c. If a single DO reading (as reported in 8.33a) fell below 60%, obtain evidence that the smolt supplier performed daily continuous monitoring with an electronic probe and recorder for a least a week demonstrating a minimum 60% saturation at all times (Appendix VIII-2).	As included in the ASC submission.		
		d. Others, please describe			

		Compliance Criteria (Use as guidance for audit only)	Audit evidence	Evaluation (Per indicator, select one category in the drop-down menu)	Justification of classification of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability
8.34	<p>Indicator: Macro-invertebrate surveys downstream from the farm's effluent discharge demonstrate benthic health that is similar or better than surveys upstream from the discharge (methodology in Appendix VIII-3)</p> <p>Requirement: Yes</p> <p>Applicability: All Smolt Producers Using Semi-Closed or Closed Production Systems</p>	a. Obtain documentation from smolt supplier(s) showing the results of macro-invertebrate surveys.	2015 results showed some downstream impact at Dalrymple- sampling was conducted in spring 2016 and July 2016, as per ASC requirements. Updated reports expected from Mainstream Biological Consulting in November 2016. Macro-invertebrate surveys are required for smolt production systems that discharge into freshwater environments, therefore this is not required for Ocean Falls (marine discharge).	Compliant	
		b. Review supplier documents (8.34a) to confirm that the surveys followed the prescribed methodology (Appendix VIII-3).	Methodology confirmed as in line with ASC requirements.		
		c. Review supplier documents (8.34a) to confirm the survey results show that benthic health is similar to or better than upstream of the supplier's discharge.	Confirmed as stated above		
		d. Others, please describe			
8.35	<p>Indicator: Evidence of implementation of biosolids (sludge) Best Management Practices (BMPs) (Appendix VIII-4)</p> <p>Requirement: Yes</p> <p>Applicability: All Smolt Producers Using Semi-Closed or Closed Production Systems</p>	a. Maintain a copy of smolt supplier's biosolids (sludge) management plan and confirm that the plan addresses all requirements in Appendix VIII-2.	Biosolids management plan provided	Compliant	
		b. Obtain from smolt suppliers a process flow diagram (detailed in Appendix VIII-2) showing how the farm is dealing with biosolids responsibly.	Schematic plans for each farm provided.		
		c. Obtain a declaration from smolt supplier stating that no biosolids were discharged into natural water bodies in the past 12 months.	Biosolids accumulated into settling ponds are not discharged into natural water bodies.		
		d. Obtain records from smolt suppliers showing monitoring of biosolid (sludge) cleaning maintenance, and disposal as described in Appendix VIII-2.	Sludge disposal in terms of quantity and method are recorded. MH Canada use Renewable Resources LTD as the final point of disposal.		
		e. Others, please describe			

ASC Audit Report - Traceability

10 Traceability Factor	Description of risk factor if present.	Describe any traceability, segregation, or other systems in place to manage the risk.
10.1 The possibility of mixing or substitution of certified and non-certified product, including product of the same or similar appearance or species, produced within the same operation.	There is deemed to be no opportunity of mixing or substitution of certified with non-certified product either prior to or at harvesting as the whole farm site is within the unit of certification.	Computerised tracking of stock information from hatchery of origin to the point of sale at the Port Hardy Processing Plant
10.2 The possibility of mixing or substitution of certified and non-certified product, including product of the same or similar appearance or species, present during production, harvest, transport, storage, or processing activities.	The auditor considers the opportunity to substitute certified with non-certified product throughout the processing activities is limited. The facility at Port Hardy handles both ASC certified and non-ASC salmon from MH Canada farms but appropriate traceability systems are employed. All finished product can be traced back to the farm and cage of origin by a unique identifier on the label. MH Canada have a system of cross-checking in place for any harvest from certified sites that controls labelling of packs with the ASC logo	Computerised tracking of stock information from hatchery of origin to the point of sale at the Port Hardy processing plant
10.3 The possibility of subcontractors being used to handle, transport, store, or process certified products.	The specialised harvesting vessel used is fully contracted to MH Canada and confirmed by interview that only fish from Ghi Ya (Bull Harbour) will be transported at one time. All other activities within the processing system are also fully controlled by MH Canada up to the point of sale.	Computerised tracking of stock information from hatchery of origin to the point of sale at the Port Hardy.
10.4 Any other opportunities where certified product could potentially be mixed, substituted, or mislabelled with non-certified product before the point where product enters the chain of custody.	None identified.	Computerised tracking of stock information from hatchery of origin to the point of sale at the Port Hardy processing plant.

10.5 Detail description of the flow of certified product within the operation and the associated traceability system which allows product to be traced from final sale back to the unit of certification

The fish held at the Ghi Ya (Bull Harbour) site will be covered by ASC Certification should this be confirmed by the audit determination. These fish are uplifted and harvested aboard a vessel fully contracted to MH Canada and then transported to the Port Hardy processing facility. All activities are fully controlled by MH Canada using primarily computerised systems logging fish origin by cage through the process.

10.6 Traceability Determination:

10.6.1 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

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

10.6.2 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.

See above.

10.6.3 The point from which chain of custody is required to begin.

The chain of custody is required to begin at the MHC Port Hardy processing facility which also has responsibility for sub-contracting the uplift of fish by wellboat.

10.6.4 Is a separate chain of custody certificate required for the producer?

Yes

Nonconformity Report Form

A copy of this form shall be completed and included in the audit report for each nonconformity raised.

Ref#	be provided	Review	NC	NC Reference	NC 1
NCF 1	CAB		NC Reference	NC 1	
NCF 2	CAB		NC Detected by	Matthew James	
NCF 3	CAB		Date Detected	20/06/2016	
NCF 4	CAB		Audit Reference	2.1.1	
NFC 5			Has a variation or interpretation (Form 1) that relates to this NC been approved by ASC. If so include the ASC variation or interpretation log reference.		N/A
NFC 6			Justification for applying the approved variation or interpretation.		N/A
NCF 6	CAB		Status of NC	Open	X
NCF 7	CAB			Closed	
NCF 8	CAB		Grade of NC	Major	
NCF 9	CAB			Minor	X
NCF 10	CAB			Observation	
NCF 11	CAB		Deadline for closing the nonconformity		12 months
NCF 12	CAB		Explanation for deadline for closing the nonconformity		ASC requirement relating to minor non-conformity.
NCF 13	CAB		Requirement Reference	Source Document	ASC Salmon Standard
NCF 14	CAB			Clause Number	2.1.1d
NCF 15	CAB			Text of Requirement	d. Collect sediment samples in accordance with the methodology in Appendix I-1 (i.e. at the time of peak cage biomass and at all required stations).
NCF 16	CAB		Description of the nonconformity		The site has not reached peak biomass, therefore the appropriate benthic samples for chemical and biological analysis cannot be collected
NCF 17	CAB		Statement of evidence detected		Review of current biomass and average weights
NCF 18	Client		Statement of any errors of fact in the nonconformity (include the name of the author and date submitted)		no errors (Katherine Dolmage 8/17/2016)
NCF 19	CAB		Response (include the name of the author and date submitted)		N/A

NCF 20	Client	Statement of the root cause of the nonconformity (include the name of the author and date submitted)	Site has not yet reached peak biomass, pre-peak samples are being analyzed currently and samples will be taken again at peak (Katherine Dolmage 8/17/2016)
NCF 21	CAB	Response (include the name of the author and date submitted)	Accepted M.James 30th August 2016
NCF 22	Client	Statement of the corrective actions proposed and taken (include the name of the author and date submitted)	See Bull Harbour ASC Benthic Biodiversity Report, separate attachment, samples taken in June. (Katherine Dolmage 9/21/2016)
NCF 23	CAB	Evaluation by CAB (include the name of the author and date submitted)	Accepted M.James 23rd September 2016
NCF 24	Client	Statement of the preventive actions proposed and taken (include the name of the author and date submitted)	Historical results will be available for future audits (Katherine Dolmage 8/17/2016)
NCF 25	CAB	Evaluation by CAB (include the name of the author and date submitted)	Accepted M.James 23rd September 2016
NCF 26	Client	Request to extend the implementation period for corrective action(s) until	No
NCF 27		Justification for extension request	
NCF 28	CAB	Extension request approval	Yes/No
NCF 29		Reason(s) for approval/ disapproval	
NCF 30		Date on which the nonconformity was closed	

Nonconformity Report Form

A copy of this form shall be completed and included in the audit report for each nonconformity raised.

Ref#	Review be provided	NC Reference	NC 2	
NCF 1	CAB	NC Reference	NC 2	
NCF 2	CAB	NC Detected by	Matthew James	
NCF 3	CAB	Date Detected	20/06/2016	
NCF 4	CAB	Audit Reference	3.1.3a	
NFC 5		Has a variation or interpretation (Form 1) that relates to this NC been approved by ASC. If so include the ASC variation or interpretation log reference.		N/A
NFC 6		Justification for applying the approved variation or interpretation.		N/A
NCF 6	CAB	Status of NC	Open	X
NCF 7	CAB		Closed	
NCF 8	CAB	Grade of NC	Major	
NCF 9	CAB		Minor	X
NCF 10	CAB		Observation	
NCF 11	CAB	Deadline for closing the nonconformity		12 months
NCF 12	CAB	Explanation for deadline for closing the nonconformity		ASC requirement relating to minor non-conformity.
NCF 13	CAB	Requirement Reference	Source Document	ASC Salmon Standard
NCF 14	CAB		Clause Number	3.1.3a
NCF 15	CAB		Text of Requirement	a. Keep records to show that a maximum sea lice load has been set for: - the entire ABM; and - the individual farm.
NCF 16	CAB	Description of the nonconformity		The farm is able to produce site lice load calculations from their Aquafarmer data but as the ABM for the farm is not yet in place a minor non-conformance is raised as no collective lice load for the 'ABM' can be calculated
NCF 17	CAB	Statement of evidence detected		During review of documentation and other evidence relating to principle 3.
NCF 18	Client	Statement of any errors of fact in the nonconformity (include the name of the author and date submitted)		no errors (Katherine Dolmage 8/17/2016)
NCF 19	CAB	Response (include the name of the author and date submitted)		N/A

NCF 20	Client	Statement of the root cause of the nonconformity (include the name of the author and date submitted)	MHC does not have the authority to alter requirements for lice levels, therefore have not calculated these numbers (Katherine Dolmage 8/17/2016)
NCF 21	CAB	Response (include the name of the author and date submitted)	Confirmed at audit discussion (M.James - 19/8/16)
NCF 22	Client	Statement of the corrective actions proposed and taken (include the name of the author and date submitted)	Total load based, based on max number of fish per area and max allowable number of leps based on DFO regulations have been calculated for each production area (Katherine Dolmage 8/17/2016)
NCF 23	CAB	Evaluation by CAB (include the name of the author and date submitted)	Will be checked at surveillance audit (M.James - 19/8/16)
NCF 24	Client	Statement of the preventive actions proposed and taken (include the name of the author and date submitted)	Lice loads will be calculated per production area and adjusted as production volumes change (Katherine Dolmage 8/17/2016)
NCF 25	CAB	Evaluation by CAB (include the name of the author and date submitted)	Will be checked at surveillance audit (M.James - 19/8/16)
NCF 26	Client	Request to extend the implemetation period for corrective action(s) until	no
NCF 27		Justification for extention request	N/A
NCF 28	CAB	Extention request approval	N/A
NCF 29		Reason(s) for approval/ disapproval	N/A
NCF 30		Date on which the nonconformity was closed	open

Nonconformity Report Form

A copy of this form shall be completed and included in the audit report for each nonconformity raised.

Ref#	be provided	NC Reference	NC 3
NCF 1	CAB	NC Reference	NC 3
NCF 2	CAB	NC Detected by	Leon Reed
NCF 3	CAB	Date Detected	21/06/2016
NCF 4	CAB	Audit Reference	6.5.1a
NFC 5		Has a variation or interpretation (Form 1) that relates to this NC been approved by ASC. If so include the ASC variation or interpretation log reference.	No
NFC 6		Justification for applying the approved variation or interpretation.	N/A
NCF 6	CAB	Status of NC	Open
NCF 7	CAB		Closed
NCF 8	CAB	Grade of NC	Major
NCF 9	CAB		Minor
NCF 10	CAB		Observation
NCF 11	CAB	Deadline for closing the nonconformity	3 months
NCF 12	CAB	Explanation for deadline for closing the nonconformity	ASC standard requirements
NCF 13	CAB	Requirement Reference	Source Document
NCF 14	CAB		Clause Number
NCF 15	CAB		Text of Requirement
NCF 16	CAB	Description of the nonconformity	Employer has documented practices, procedures (including emergency response procedures) and policies to protect employees from workplace hazards and to minimize risk of accident or injury. The information shall be available to employees.
NCF 17	CAB	Statement of evidence detected	Docking platform is made from pallets which are not suitable as there is a transfer of products and people onto boats from this platform. No load testing is available to show that the pallets are suitable.
NCF 18	Client	Statement of any errors of fact in the nonconformity (include the name of the author and date submitted)	It was noted while on the farm tour that pallets are being used to form a platform.
			no errors (Katherine Dolmage 8/17/2016)

NCF 19	CAB	Response (include the name of the author and date submitted)	N/A
NCF 20	Client	Statement of the root cause of the nonconformity (include the name of the author and date submitted)	Outdated equipment being used on site while awaiting delivery of new feed barge/house (Katherine Dolmage 8/17/2016)
NCF 21	CAB	Response (include the name of the author and date submitted)	Confirmed by observation (M.James - 19/8/16)
NCF 22	Client	Statement of the corrective actions proposed and taken (include the name of the author and date submitted)	Interim fix to pallets included in photo (attached). A new feed barge/living accommodation is being moved from another site- expected late August- which will rectify the issue (Katherine Dolmage 8/17/2016)
NCF 23	CAB	Evaluation by CAB (include the name of the author and date submitted)	Confirmation received by way of photographic evidence of steel grating platform on feed barge, Closed (M.James - 23rd September 2016)
NCF 24	Client	Statement of the preventive actions proposed and taken (include the name of the author and date submitted)	Newly built barge has met H&S requirements and eliminates dangerous issues with old equipment (Katherine Dolmage 8/17/2016)
NCF 25	CAB	Evaluation by CAB (include the name of the author and date submitted)	Confirmation received by way of photographic evidence of steel grating platform on feed barge, replacement barge plan will provide correct embarkation points. Closed (M.James - 23rd September 2016)
NCF 26	Client	Request to extend the implementation period for corrective action(s) until	No
NCF 27		Justification for extension request	
NCF 28	CAB	Extension request approval	Yes/No
NCF 29		Reason(s) for approval/ disapproval	
NCF 30		Date on which the nonconformity was closed	23rd September 2016

Nonconformity Report Form

A copy of this form shall be completed and included in the audit report for each nonconformity raised.

Ref#	be provided	NC Reference	NC 4
NCF 1	CAB	NC Reference	NC 4
NCF 2	CAB	NC Detected by	Leon Reed
NCF 3	CAB	Date Detected	21/06/2016
NCF 4	CAB	Audit Reference	6.5.1a
NFC 5		Has a variation or interpretation (Form 1) that relates to this NC been approved by ASC. If so include the ASC variation or interpretation log reference.	N/A
NFC 6		Justification for applying the approved variation or interpretation.	N/A
NCF 6	CAB	Status of NC	Open
NCF 7	CAB		Closed
NCF 8	CAB	Grade of NC	Major
NCF 9	CAB		Minor
NCF 10	CAB		Observation
NCF 11	CAB	Deadline for closing the nonconformity	3 Months
NCF 12	CAB	Explanation for deadline for closing the nonconformity	ASC requirements
NCF 13	CAB	Requirement Reference	Source Document
NCF 14	CAB		Clause Number
NCF 15	CAB		Text of Requirement
NCF 16	CAB	Description of the nonconformity	Employer has documented practices, procedures (including emergency response procedures) and policies to protect employees from workplace hazards and to minimize risk of accident or injury. The information shall be available to employees. The second barge is unsafe, the house has been sealed off and the decking is weak. workers have accesses to this unsafe working area.
NCF 17	CAB	Statement of evidence detected	A basic inspection was carried out of the second barge. It was noted that the overall condition was very poor and unsafe to carry out a detailed inspection
NCF 18	Client	Statement of any errors of fact in the nonconformity (include the name of the author and date submitted)	No errors (Katherine Dolmage 8/17/2016)

NCF 19	CAB	Response (include the name of the author and date submitted)	
NCF 20	Client	Statement of the root cause of the nonconformity (include the name of the author and date submitted)	Old equipment being used as interim solution while awaiting new equipment. Staff aware that access to west side of barge not allowed, but signage was not available to confirm this (Katherine Dolmage 8/17/2016)
NCF 21	CAB	Response (include the name of the author and date submitted)	Confirmed by observation (M.James - 19/8/16)
NCF 22	Client	Statement of the corrective actions proposed and taken (include the name of the author and date submitted)	West side of barge has been clearly marked as a no-go zone while awaiting delivery of a new barge- this barge will be removed from the site and from MHC production (Katherine Dolmage 8/17/2016)
NCF 23	CAB	Evaluation by CAB (include the name of the author and date submitted)	Confirmation received by way of photographic evidence of blocked access point, Closed (M.James - 23rd September 2016)
NCF 24	Client	Statement of the preventive actions proposed and taken (include the name of the author and date submitted)	New equipment has met all H&S specifications (Katherine Dolmage 8/17/2016)
NCF 25	CAB	Evaluation by CAB (include the name of the author and date submitted)	Confirmation received by way of photographic evidence of blocked access point, removal of barge from site will remove risk permanently. Closed (M.James - 23rd September 2016)
NCF 26	Client	Request to extend the implementation period for corrective action(s) until	No
NCF 27		Justification for extension request	
NCF 28	CAB	Extension request approval	Yes/No
NCF 29		Reason(s) for approval/ disapproval	
NCF 30		Date on which the nonconformity was closed	23rd September 2016

Nonconformity Report Form

A copy of this form shall be completed and included in the audit report for each nonconformity raised.

Ref#	be provided	NC Reference	NC 5
NCF 1	CAB	NC Reference	NC 5
NCF 2	CAB	NC Detected by	Leon Reed
NCF 3	CAB	Date Detected	21/06/2016
NCF 4	CAB	Audit Reference	6.5.1a
NFC 5		Has a variation or interpretation (Form 1) that relates to this NC been approved by ASC. If so include the ASC variation or interpretation log reference.	N/A
NFC 6		Justification for applying the approved variation or interpretation.	N/A
NCF 6	CAB	Status of NC	Open
NCF 7	CAB		Closed
NCF 8	CAB	Grade of NC	Major
NCF 9	CAB		Minor
NCF 10	CAB		Observation
NCF 11	CAB	Deadline for closing the nonconformity	12 months
NCF 12	CAB	Explanation for deadline for closing the nonconformity	ASC requirements
NCF 13	CAB	Requirement Reference	Source Document
NCF 14	CAB		Clause Number
NCF 15	CAB		Text of Requirement
NCF 16	CAB	Description of the nonconformity	Employer has documented practices, procedures (including emergency response procedures) and policies to protect employees from workplace hazards and to minimize risk of accident or injury. The information shall be available to employees.
NCF 17	CAB	Statement of evidence detected	Sea taxi personnel stepped onto the barge without the use of a life vest. The site manager did not instruct the contractor to wear a life vest until the auditor pointed out that no life vest was being worn
			Noted whilst inspection of the farm site was being carried out.

NCF 18 Client	Statement of any errors of fact in the nonconformity (include the name of the author and date submitted)	No errors (Katherine Dolmage 8/17/2016)
NCF 19 CAB	Response (include the name of the author and date submitted)	N/A
NCF 20 Client	Statement of the root cause of the nonconformity (include the name of the author and date submitted)	New contractor was unaware of the safety requirements on site (Katherine Dolmage 8/17/2016)
NCF 21 CAB	Response (include the name of the author and date submitted)	General observation of staff and contractors working on sites indicated compliance in all other instances relating to PPE. (M.James - 19/8/16)
NCF 22 Client	Statement of the corrective actions proposed and taken (include the name of the author and date submitted)	Area Manager Dean Trethewey has confirmed with contract company requirements for all contractors on site (Katherine Dolmage 8/17/2016)
NCF 23 CAB	Evaluation by CAB (include the name of the author and date submitted)	Is noted for observation at the surveillance audit (M.James - 19/8/16)
NCF 24 Client	Statement of the preventive actions proposed and taken (include the name of the author and date submitted)	Action will be put into place to confirm that any new contract staff on site undergoes H&S indoctrination (Katherine Dolmage 8/17/2016) Area manager Dean Trethewey has also been in contact with GNN Marine (Cyndi and Garry) to confirm all boat operators are aware of MHC requirements regarding PFDs
NCF 25 CAB	Evaluation by CAB (include the name of the author and date submitted)	To be confirmed at the surveillance audit (M.James - 19/8/16)
NCF 26 Client	Request to extend the implemetation period for corrective action(s) until	no
NCF 27	Justification for extention request	N/A
NCF 28 CAB	Extention request approval	N/A
NCF 29	Reason(s) for approval/ disapproval	N/A
NCF 30	Date on which the nonconformity was closed	

Nonconformity Report Form

A copy of this form shall be completed and included in the audit report for each nonconformity raised.

Ref#	Review be provided	NC Reference	NC 6
NCF 1	CAB	NC Reference	NC 6
NCF 2	CAB	NC Detected by	Leon Reed
NCF 3	CAB	Date Detected	21/06/2016
NCF 4	CAB	Audit Reference	6.5.1a
NFC 5		Has a variation or interpretation (Form 1) that relates to this NC been approved by ASC. If so include the ASC variation or interpretation log reference.	N/A
NFC 6		Justification for applying the approved variation or interpretation.	N/A
NCF 6	CAB	Status of NC	Open
NCF 7	CAB		Closed
NCF 8	CAB	Grade of NC	Major
NCF 9	CAB		Minor
NCF 10	CAB		Observation
NCF 11	CAB	Deadline for closing the nonconformity	12 months
NCF 12	CAB	Explanation for deadline for closing the nonconformity	ASC requirements
NCF 13	CAB	Requirement Reference	Source Document
NCF 14	CAB		Clause Number
NCF 15	CAB		Text of Requirement
NCF 16	CAB	Description of the nonconformity	Employer has documented practices, procedures (including emergency response procedures) and policies to protect employees from workplace hazards and to minimize risk of accident or injury.
NCF 17	CAB	Statement of evidence detected	Damaged ladder was identified while on a tour of the farm. The new procedure to removed damaged ladders has not identified this damaged ladder.
NCF 18	Client	Statement of any errors of fact in the nonconformity (include the name of the author and date submitted)	Noted while farm inspection was carried out
			No errors (Katherine Dolmage 8/17/2016)

NCF 19 CAB	Response (include the name of the author and date submitted)	N/A
NCF 20 Client	Statement of the root cause of the nonconformity (include the name of the author and date submitted)	Ladder had been flagged for removal but was not communicated to site staff, removed from trash and returned to use (Katherine Dolmage 8/17/2016)
NCF 21 CAB	Response (include the name of the author and date submitted)	Accepted (M.James - 19/8/16)
NCF 22 Client	Statement of the corrective actions proposed and taken (include the name of the author and date submitted)	Ladder has been removed from site and disposed of (Katherine Dolmage 8/17/2016)
NCF 23 CAB	Evaluation by CAB (include the name of the author and date submitted)	Will be confirmed at Surveillance audit (M.James - 19/8/16), also confirm records of checks by H and S department.
NCF 24 Client	Statement of the preventive actions proposed and taken (include the name of the author and date submitted)	H&S department and certification department verifying during each site visit that no non-compliant ladders remain on MHC sea sites (Katherine Dolmage 8/17/2016)
NCF 25 CAB	Evaluation by CAB (include the name of the author and date submitted)	Will be confirmed at Surveillance audit (M.James - 19/8/16), also confirm records of checks by H and S department.
NCF 26 Client	Request to extend the implementation period for corrective action(s) until	no
NCF 27	Justification for extension request	N/A
NCF 28 CAB	Extension request approval	N/A
NCF 29	Reason(s) for approval/ disapproval	N/A
NCF 30	Date on which the nonconformity was closed	

Nonconformity Report Form

A copy of this form shall be completed and included in the audit report for each nonconformity raised.

Ref#	be provided	NC Reference	NC 7
NCF 1	CAB	NC Reference	NC 7
NCF 2	CAB	NC Detected by	Matthew James
NCF 3	CAB	Date Detected	24/06/2016
NCF 4	CAB	Audit Reference	8.4g
NFC 5		Has a variation or interpretation (Form 1) that relates to this NC been approved by ASC. If so include the ASC variation or interpretation log reference.	N/A
NFC 6		Justification for applying the approved variation or interpretation.	N/A
NCF 6	CAB	Status of NC	Open
NCF 7	CAB		Closed
NCF 8	CAB	Grade of NC	Major
NCF 9	CAB		Minor
NCF 10	CAB		Observation
NCF 11	CAB	Deadline for closing the nonconformity	12 months
NCF 12	CAB	Explanation for deadline for closing the nonconformity	ASC requirement relating to minor non-conformity.
NCF 13	CAB	Requirement Reference	Source Document
NCF 14	CAB		Clause Number
NCF 15	CAB		Text of Requirement
NCF 16	CAB	Description of the nonconformity	Using the formula in Appendix VIII-1 and results from 8.4a-f, calculate total phosphorus released per ton of smolt produced and verify that the smolt supplier is in compliance with requirements. Calculation provided did not follow the formula provided in the appendix VIII-1.
NCF 17	CAB	Statement of evidence detected	During review of documentation relating to section 8.
NCF 18	Client	Statement of any errors of fact in the nonconformity (include the name of the author and date submitted)	no errors (Katherine Dolmage 8/17/2016)
NCF 19	CAB	Response (include the name of the author and date submitted)	N/A

NCF 20	Client	Statement of the root cause of the nonconformity (include the name of the author and date submitted)	Calculation made using estimate of volume of sludge currently in tanks, making calculations inaccurate (Katherine Dolmage 8/18/2016)
NCF 21	CAB	Response (include the name of the author and date submitted)	Agreed (M.James 19/8/16)
NCF 22	Client	Statement of the corrective actions proposed and taken (include the name of the author and date submitted)	More accurate calculations of current sludge volume will be made prior to additional phosphorus sampling to ensure proper calculations (Katherine Dolmage 8/18/2016)
NCF 23	CAB	Evaluation by CAB (include the name of the author and date submitted)	Calculation will be checked at Surveillance audit (M.James 19/8/16)
NCF 24	Client	Statement of the preventive actions proposed and taken (include the name of the author and date submitted)	New effluent treatment planned for Dalrymple, calculations will again take place based on phosphorus retention in new system (Katherine Dolmage 8/18/2016)
NCF 25	CAB	Evaluation by CAB (include the name of the author and date submitted)	Development will be checked at Surveillance audit (M.James 19/8/16)
NCF 26	Client	Request to extend the implementation period for corrective action(s) until	no
NCF 27		Justification for extension request	N/A
NCF 28	CAB	Extension request approval	N/A
NCF 29		Reason(s) for approval/ disapproval	N/A
NCF 30		Date on which the nonconformity was closed	

ASC Audit Report - Closing

11 Findings

11.1 A summary table that lists all non-conformities and observations

NC reference	NC Status	Clause Reference	Description of NC	Descriptions of actions pending
NC 1	Minor	2.1.1	The site has not reached peak biomass, therefore the appropriate benthic samples for chemical and biological analysis cannot be collected	A minor NC has been raised. The audit has been scheduled prior to the farm reaching peak biomass. Compliance cannot be assessed for 2.1.1, 2.1.2 or 2.1.3. The farm has demonstrated an understanding of the requirements and an intention to sample at the appropriate point in the production cycle
NC 2	Minor	3.1.3 a	No collective lice load for the 'ABM' can be calculated	The farm has a good individual data set as do all MH Farms in the area being considered. Lice Load information will be collated for the farming area and a collective lice load will be calculated.
NC 3	Major	6.5.1 a	No load testing is available to show that the pallets are suitable for use as a docking platform.	The two NCs listed as Major were deemed to present significant ongoing risk to farm personnel.
NC 4	Major	6.5.1 a	workers have access to an unsafe working area (redundant barge).	The two NCs listed as Major were deemed to present significant ongoing risk to farm personnel.

NC 5	Minor	6.5.1 a	Sea taxi personnel stepped onto the barge without the use of a life vest.	The 'Contractor not wearing a life vest' NC was listed as minor as this was the only breach of this nature observed during the farm visits.
NC 6	Minor	6.5.1 a	A damaged ladder was identified while on a tour of the farm. The procedure to remove damaged ladders has not identified this damaged ladder.	The 'Damaged ladder' NC was listed as minor as the damage to the ladder did not present serious risk to the farm employees.
NC 7	Minor	8.4 g	Phosphorous calculation provided did not follow the formula provided in the appendix VIII-1.	8.4g - The calculation was inaccurate however an estimate by the auditor of sludge removal was calculated to result in compliance with the criterion

11.2

11.3 A copy of the non-conformity report form completed for each non-conformity and observation raised.

12 Evaluation Results If any approved requests for variations or interpretations have been used, a full copy of the approved variation or interpretation form shall be appended to the report. **If used in raising an NC**, the ASC reference number (NCF 5) and a justification for its use (NCF 6) shall be completed in the NC report form.

<p>12.1 A report of the results of the audit of the operation against the specific elements in the standard and guidance documents.</p>	<p>See the Audit template section. Harvesting of salmon was not witnessed as the harvest cycle has not commenced when the audit took place, although the site is close to peak biomass and due to commence harvesting in September / October 2016. Marine Harvest Canada is intending to have certified product on the market when they harvest, and it is proposed that the harvesting process will be witnessed during the surveillance audit phase.</p> <p>It should be noted that Marine Harvest Canada elected not to redact any information (no information excluded due to confidentiality) from the audit report therefore there is no separate 'redacted' version or Confidential Annexes.</p>
<p>12.2 A clear statement on whether or not the audited unit of certification has the capability to consistently meet the objectives of the relevant</p>	<p>The audit team are of the opinion that the unit of certification has the capability to consistently meet the objectives of the ASC Salmon Standard.</p>
<p>12.3 In cases where Biodiversity Environmental Impact Assessment (BEIA) or Participatory Social Impact Assessment (PSIA) is available, it shall be added in full to the audit report. IF these documents are not in English, then a synopsis in English shall be added to the report as well.</p>	<p>N/A</p>

13 Decision

<p>13.1 Has a certificate been issued? (yes/no)</p>	<p>Yes</p>
<p>13.2 The Eligibility Date (if applicable)</p>	<p>The date of certification, 7th October 2016</p>

13.3 Is a separate coc certificate required for the producer? (yes/no)	Yes, at their Port Hardy harvest and packing operation.
13.4 If a certificate has been issued this section shall include:	
13.4.1 The date of issue and date of expiry of the certificate.	Certificate issue daye: 7th October 2016 Certificate Expiry date: 6th October 2019
13.4.2 The scope of the certificate	Marine Harvest Canada - Ghi-ya (Bull Harbour) Farm. Single Site certification covering all production within the UOC.
13.4.3 Instructions to stakeholders that any complaints or objections to the CAB decision are to be subject to the CAB's complaints procedure. This section shall include information on where to review the procedure and	Comments or complaints may be passed to isla.paterson@acoura.com

14 Surveillance

14.1	Next planned Surveillance	
	14.1.1 Planned date	Late September/Early October 2017
14.2	14.1.2 Planned site	Ghi-ya (Bull Harbour)
	Next audit type	
	14.2.1 Surveillance 1	Yes
	14.2.2 Surveillance 2	N/A
	14.2.3 Re-certification	N/A
	14.2.4 Other (specify ty	N/A

ATTN: Isla Paterson
Accreditation Officer
Acoura Marine Limited
asc@acoura.com

19th September, 2016

Stakeholder Submission RE: Draft Public Certification Report, Marine Harvest Canada's Bull Harbour farm, by Acoura Marine Ltd., dated 20th July 2016 (Public Comment Period: 5-19 September 2016).

Upon review of the draft Aquaculture Stewardship Council (ASC) audit for Marine Harvest Canada's (MHC) Bull Harbour farm, conducted by Acoura Marine Ltd., the below-noted stakeholders have serious concerns regarding the omissions and lack of available evidence within the report. We believe that approving ASC certification of this farm would severely undermine the salmon standard established by the ASC.

The ASC Certification and Accreditation Requirements (CAR V2.0) stipulates the availability of sufficient records/evidence are needed in order to conduct an audit. Due to the facts that the very first production cycle of Bull Harbour is yet to be completed and the audit timing was before the harvest, we find the draft audit report consequently does not provide sufficient evidence that demonstrates the farm has successfully met the salmon standard criteria, simply because the data is incomplete.

We believe it would be irresponsible for Acoura Marine Ltd to grant ASC certification to a farm that is yet to complete its first production cycle. Doing so would undermine the credibility of ASC, the salmon standard and Acoura Marine Ltd.

Our comments and concerns are provided in detail below. We look forward to hearing how the Acoura Marine Ltd will address these serious concerns.

Sincerely,

Kelly Roebuck
Living Oceans Society

John Werring
David Suzuki Foundation

Stan Proboszcz
Watershed Watch Salmon Society

Colleen Turlo
Ecology Action Centre

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1. CARv2.0 Process Requirements: Audit Timing

We note the audit was conducted under Version 2.0 of the ASC Certification and Accreditation Requirements, as per the footer of the draft audit report. The ASC Certification and Accreditation Requirements (CAR) Version 2.0 has the following stated Process Requirements (17):

17.1 Unit of Certification

17.1.2.1 All clients seeking certification shall have available records of performance data covering the periods of time specified in the standard(s) against which the audit(s) is to be conducted; and

17.4 Audit Timing

17.4.5 Audits shall not be conducted until sufficient records/evidence are available for all applicable standard requirements as the minimum.

The audit failed to meet these CARv2.0 process requirements, as the audit data and sufficient records/evidence covering the periods of time specified in the salmon standard were not yet available.

The issue is compounded by the fact that Bull Harbour is a new farm that is yet to complete its first production cycle. The following further details our concerns.

a) Salmon Standard requirements: Current production cycle data

Being a new farm, Bull Harbour is yet to complete a full production cycle worth of data. Without the completion of a full production cycle and the audit taking place before harvest, the records and evidence for the applicable standard requirements are simply not available.

The audit took place before sufficient and complete records/evidence were available to assess:

- 2.1.1 Redox potential or sulphide levels
- 2.1.2 Faunal index score
- 2.1.3 Number of macrofaunal taxa
- 3.4.1 Maximum number of escapees in the most recent production cycle
- 3.4.3 Estimated Unexplained loss
- 4.2.1 Fishmeal Forage Fish Dependency Ratio
- 4.2.2 Fish Oil Forage Fish Dependency Ratio
- 5.1.5 Maximum viral disease-related morality
- 5.1.6 Maximum unexplained morality rate
- 5.2.1 On farm documentation... chemicals and therapeutants used...
- 5.2.5 Maximum farm level cumulative parasiticide treatment index (PTI) score
- 5.2.7 Allowance for prophylactic use of antimicrobial treatments
- 5.2.8 Allowance for use of antibiotics listed as critically important...WHO
- 5.2.9 Number of treatments of antibiotics
- 5.4.4 If an OIE-notifiable disease is confirmed...

With the exception of 2.1.1, **all of the indicators above are listed as “conforming” - despite not having available all the sufficient records and evidence required.**

For example, since the audit was conducted, a SLICE treatment was administered at Bull Harbour on 16 July 2016. This evidence is not reflected in the draft audit report for public review. While this particular example may not affect the farm meeting indicator 5.2.5, it does demonstrate that incorrect audit timing can result in insufficient records and evidence. Therefore, there is a high risk and the likely potential to miss evidence that may affect certification, as an incomplete production cycle equates to incomplete evidence.

b) Salmon Standard requirements: Previous production cycle data

In addition to the lack of a full production cycle worth of sufficient records and evidence, no previous production cycle data is available for the Bull Harbour farm as it is currently conducting its first cycle.

The following indicators require records and evidence from previous production cycles:

- 2.5.6 *Maximum number of lethal incidents*
("Maximum number of lethal incidents on the farm over the prior two years")
- 5.1.4 *Percentage of mortalities that are recorded...*
("Farms are required to maintain mortality records from the current and two previous production cycles. For first audit, records for the current and prior production cycle are required")
- 5.1.6 *Maximum unexplained mortality rate...*
("...from each of the previous two production cycles, for farms with total mortality > 6%")
- 5.2.1 *On-farm documentation... chemicals and therapeutants used*
("If not already available, assemble records of chemical and therapeutant use to address all points in 5.2.1a for the previous two production cycles. For first audits, available records must cover one full production cycle immediately prior to the current cycle")
- 5.2.3 *Percentage of medication events that are prescribed by a veterinarian*
("Records can be kept in conjunction with those for 5.2.1 and should be kept for the current and two prior production cycles")
- 5.2.7 *Allowance for prophylactic use of antimicrobial treatments*
("Maintain records for all purchases of antibiotics (invoices, prescriptions) for the current and prior production cycles")
- 5.2.9 *Number of treatments of antibiotics*
("a. Maintain records of all treatments of antibiotics (see 5.2.1a). For first audits, farm records must cover the current and immediately prior production cycles in a verifiable statement.")

All of the indicators above are listed as “conforming” - despite not having available all the sufficient records and evidence required.

c) Incomplete Production Cycle Data – Intermediary Stage

It is common practice in British Columbia for salmon farming production cycles to include an intermediary stage (such as nursery, transfer or early grow-out pens). For the primary product being assessed, all stages of the production cycle should be included to ensure compliance to the ASC salmon standard indicators and the chain of custody.

There is no mention of an intermediary stage in the draft audit report. However, we understand Marine Harvest's well boat, Roy Kristian, made two trips from Shelter Bay to Bull Harbour on September 25th, 2015. We request clarification on whether there was a split of fish at Shelter Bay and confirmation if the Shelter Bay farm was used as an intermediary stage for the current Bull Harbour production cycle. If so, the records and evidence from the intermediary farm should be included in the audit report to demonstrate compliance. Evidence should include the drowning of 6 California sea lions at Shelter Bay in July 2014 (see Indicator 2.5.6 below).

d) Exclusion of harvest activities from initial audit

The ASC CAR V2.0 requires that *"The CAB's initial audit should include harvesting activities of the principle product to be audited."* (Audit Timing 17.4.2).

Again, by conducting the audit before the harvest and completion of the farm's maiden production cycle, there is incomplete evidence to conclude the farm is conforming to the salmon standard indicators. The indicators listed above in 1a) are not able to be assessed until sufficient records and evidence from the completed production cycle are available.

While we acknowledge the audit report meets CAR 17.4.6 requirement of listing and providing an alternative timing, we submit the justification of "...intending to have certified product on the market..." compromises the integrity and rigour of the ASC and salmon standard.

For reasons detailed in 1a)-d), we submit the CAB failed to meet their obligations under 17.4 of the CAR. Similarly, MHC failed to meet their client obligations listed under CAR 17.1 (Unit of Certification).

2. Non Conformities

Indicators 2.1.1 – 2.1.3 (Benthic Monitoring)

Due to the audit being conducted prior to harvest and peak biomass, indicators 2.1.1-2.1.3 did not have sufficient evidence for compliance (as required by the CAR 17.4.5). We note a Minor Non-Conformity has been raised for indicator 2.1.1 and is listed as “Open” with a deadline of 12 months.

It should be noted that the text within Nonconformity Report Form for NC1 was incomplete, as the text was cut off, making it difficult for review. Nevertheless, the NC1 states:

*“A minor NC has been raised. The audit has been scheduled prior to the farm reaching peak biomass. **Compliance cannot be assessed for 2.1.1, 2.1.2 or 2.1.3.** The farm has demonstrated an understanding of the requirements and an intention to sample at the appropriate point in the production cycle”*

Given the inability to assess compliance for all three indicators, we question why indicators 2.1.2 and 2.1.3 are listed as “compliant” in the audit report.

Indicator 2.2.3 For jurisdictions that have national or regional coastal water quality targets, demonstration through third-party analysis that the farm is in an area recently class

The salmon standard indicates jurisdiction water quality targets should include nutrients N, P, chlorophyll A. The Canadian Councils of Ministers of the Environment (CCME) guidelines require only nitrate concentration and therefore should be deemed inadequate. 2.2.3b references The ‘Nutrient release for net cage culture’ by GlobalAquafood Development Corporation April 2014. Another ASC audit report (Duncan Island) also references this report and notes it as a literature review by Dr. Stephen F Cross (Founder of GlobalAquafood) of papers dating from 1982-2005. Footnote 17 requires evidence to be from within the last 2 years prior to the audit. Given the report relies on data 11 years and older, we submit this report to be inadequate. Additionally, the analysis report is required to be from a third-party. We query the third-party impartiality of the analysis report given that GlobalAquafood and the author appear to be in a conflict of interest given their strong support¹ for the BC aquaculture industry.

Therefore, compliance to 2.2.4 should be required.

¹ <http://www.aquacultureassociation.ca/assets/Uploads/AAC-Bulletin-112-1.pdf>

Indicator 2.5.6 Maximum number of lethal incidents on the farm over the prior two years

As mentioned in 1c) above, if another MHC farm, Shelter Bay, was indeed used as an intermediary farm before being transferred to Bull Harbour, then the evidence that 6 California sea lions drowned at Shelter Bay in July 2014² would result in non-compliance for 2.5.6. This event occurred within the two-year period immediately prior to the Bull Harbour audit.

Indicator 3.1.7 In areas of wild salmonids, maximum on-farm lice levels during sensitive periods for wild fish and Compliance with the Variance

The draft audit report cites Variance Request 141 for Bull Harbour's compliance under indicator 3.1.7. In VR 141, the CAB recommended:

"Therefore, we recommend that Monday Rocks farm to be certified with a higher sea lice trigger based on the legal definition of 3 motile lice per fish within the context of clause PI 3.1.7"

The Variance Request was approved by the ASC, with a reference to deferring to the Pacific Aquaculture Regulations (PAR):

"Canadian regulations differ from the ASC standard in that up to 3 mature female sea lice per fish are allowed before treatment is triggered. Only one chemical treatment is allowed".

It is important to note that the quoted statement by ASC is erroneous. The PAR trigger for management action is 3 *motile* lice per fish; and BC salmon farmers have access to two therapeutants, SLICE and hydrogen peroxide, with the ability to treat as often as required to control lice within the threshold. **In any event, the conclusion from the Variance Request was to defer to the PAR requirement of 3 motile lice vs. the Salmon Standard of 0.1 adult females /fish.**

Based on the referenced approved variance, it can be expected that the Bull Harbour farm would need to demonstrate meeting the PAR requirements of 3 motile lice per fish in order to be conforming to 3.1.7 of the ASC Salmon Standard.

Bull Harbour breached the PAR threshold in June 2016 (4.5 motile lice per fish) and July 2016 (5.21 motile lice per fish)³. **Therefore, compliance to the variance of the PAR threshold was not met.**

² http://www.pac.dfo-mpo.gc.ca/aquaculture/reporting-rapports/docs/mar_mamm/drowning-noyade/2014-Q3-T3-eng.html

³ http://marineharvest.ca/planet/environmental_commitment/additional-data-reporting/

Indicator 8.4 Maximum total amount of phosphorus released

The draft audit report only provides a calculation for the Ocean Falls hatchery. Please provide the Dalrymple site calculation to demonstrate transparency and robustness.

Indicators 8.15-8.23 Smolt Production; 8.32-8.33 Additional Requirements for Smolt Producers

These indicators are not appropriately assessed as it simply refers to all being “internal” in nature (8.15-8.23). Whether the smolt producer is MHC or ‘internal’, the ASC salmon standard indicators are still required to be completed (e.g. antibiotics used, amount, etc) to demonstrate compliance.

Likewise, the audit report fails to demonstrate compliance with indicators 8.32-8.33, which are listed as “As included in the ASC submission”.

Indicator 8.34 Macro-invertebrate surveys downstream

The CAB listing of indicator 8.34 as “compliant”, appears in contradiction of the comment: “2015 results showed some downstream impact at Dalrymple...”. The audit draft notes updated reports are expected in November 2016. We question why a non-conformance was not raised.

ATTN: Kelly Roebuck
Living Oceans Society
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Sointula
BC
V0N 3E0

T: 0131 335 6600
E: info@acoura.com

5th October 2016

RE: Stakeholder Submission RE: Draft Public Certification Report, Marine Harvest Canada's Bull Harbour farm, by Acoura Marine Ltd., dated 20th July 2016 (Public Comment Period: 5-19 September 2016).

Dear Kelly,

Thank you for your letter dated 19th September 2016, on behalf of Living Oceans Society, David Suzuki Foundation, Watershed Watch Salmon Society and Ecology Action Centre with regards to Acoura Marine's Public Comment Draft Report of Marine Harvest Canada's Bull Harbour Site.

We value all comments, as stakeholder input is a vital part of the audit process should they wish to contribute.

The audit team have considered your comments in the response below, which I hope fully addresses any concerns you may have had regarding the audit process at this farm.

If you require any further information, please kindly respond to us prior to 8am GMT+1 on Friday 7th October to allow us to respect agreed reporting deadlines.

Yours sincerely



Martin Gill
Managing Director

LOS

1. CARv2.0 Process Requirements: Audit Timing

We note the audit was conducted under Version 2.0 of the ASC Certification and Accreditation Requirements, as per the footer of the draft audit report. The ASC Certification and Accreditation Requirements (CAR) Version 2.0 has the following stated Process Requirements (17):

17.1 Unit of Certification

17.1.2.1 All clients seeking certification shall have available records of performance data covering the periods of time specified in the standard(s) against which the audit(s) is to be conducted; and

17.4 Audit Timing

17.4.5 Audits shall not be conducted until sufficient records/evidence are available for all applicable standard requirements as the minimum.

The audit failed to meet these CARv2.0 process requirements, as the audit data and sufficient records/evidence covering the periods of time specified in the salmon standard were not yet available.

The issue is compounded by the fact that Bull Harbour is a new farm that is yet to complete its first production cycle. The following further details our concerns.

CAB

CAR Version 1.0 was used for the audit; the requirement to use CAR version 2.0 does not become mandatory until January 2017. The ASC had issued Version 2.0 audit documents including the audit checklist requesting the latter be used going forward, to make reporting more consistent we chose to adopt the new checklist prior to adopting V2 of the CAR.

In our opinion the complete audit process includes an assessment audit and the two surveillance audits, the rationale being that the whole farming process will be captured within this and this is encapsulated within the updated CAR which requires witnessing of harvest to occur at one audit during the three-year certification period. For CAR V1.0 17.4.3 "If the CAB determines that it is not possible to conduct the initial audit as specified in 17.4.2, the CAB shall 1. Record this determination in the audit report and 2. Provide a justification for the alternative timing. Both points were covered within the audit report.

We note that a significant number of farms certified to the ASC salmon standard have not included the harvesting process at the assessment audit and the justification provided has been accepted.

In addition, a review of previous dialogue involving Living Oceans and another CAB have clarified data requirements and stated that post-harvest data will not be reviewed until the surveillance audit.

LOS

a) Salmon Standard requirements: Current production cycle data

Being a new farm, Bull Harbour is yet to complete a full production cycle worth of data. Without the completion of a full production cycle and the audit taking place before harvest, the records and evidence for the applicable standard requirements are simply not available.

CAB

There is nothing in the ASC standard or CAR that prevents auditing a newly established site.

LOS

The audit took place before sufficient and complete records/evidence were available to assess:

- 2.1.1 Redox potential or sulphide levels
- 2.1.2 Faunal index score
- 2.1.3 Number of macrofaunal taxa
- 3.4.1 Maximum number of escapees in the most recent production cycle
- 3.4.3 Estimated Unexplained loss
- 4.2.1 Fishmeal Forage Fish Dependency Ratio
- 4.2.2 Fish Oil Forage Fish Dependency Ratio
- 5.1.5 Maximum viral disease-related mortality
- 5.1.6 Maximum unexplained mortality rate
- 5.2.1 On farm documentation... chemicals and therapeutants used...
- 5.2.5 Maximum farm level cumulative parasiticide treatment index (PTI) score
- 5.2.7 Allowance for prophylactic use of antimicrobial treatments
- 5.2.8 Allowance for use of antibiotics listed as critically important...WHO
- 5.2.9 Number of treatments of antibiotics
- 5.4.4 If an OIE-notifiable disease is confirmed...

With the exception of 2.1.1, **all of the indicators above are listed as “conforming” - despite not having available all the sufficient records and evidence required.**

CAB

This information will obviously not all be available for a site in its first production cycle and will be reviewed at surveillance.

LOS

For example, since the audit was conducted, a SLICE treatment was administered at Bull Harbour on 16 July 2016. On-site dates for audit during week commencing 20th June so irrelevant at this assessment audit. This evidence is not reflected in the draft audit report for public review. While this particular example may not affect the farm meeting indicator 5.2.5, it does demonstrate that incorrect audit timing can result in insufficient records and evidence. Therefore, there is a high risk and the likely potential to miss evidence that may affect certification, as an incomplete production cycle equates to incomplete evidence.

CAB

This treatment was after the onsite audit and will be factored at surveillance.

LOS

b) Salmon Standard requirements: Previous production cycle data

In addition to the lack of a full production cycle worth of sufficient records and evidence, no previous production cycle data is available for the Bull Harbour farm as it is currently conducting its first cycle.

The following indicators require records and evidence from previous production cycles:

- 2.5.6 Maximum number of lethal incidents
 (“Maximum number of lethal incidents on the farm over the prior two years”)
- 5.1.4 Percentage of mortalities that are recorded...

("Farms are required to maintain mortality records from the current and two previous production cycles. For first audit, records for the current and prior production cycle are required")

- 5.1.6 *Maximum unexplained mortality rate...*

("...from each of the previous two production cycles, for farms with total mortality > 6%")

- 5.2.1 *On-farm documentation... chemicals and therapeutants used*

("If not already available, assemble records of chemical and therapeutant use to address all points in 5.2.1a for the previous two production cycles. For first audits, available records must cover one full production cycle immediately prior to the current cycle")

- 5.2.3 *Percentage of medication events that are prescribed by a veterinarian*

("Records can be kept in conjunction with those for 5.2.1 and should be kept for the current and two prior production cycles")

- 5.2.7 *Allowance for prophylactic use of antimicrobial treatments*

("Maintain records for all purchases of antibiotics (invoices, prescriptions) for the current and prior production cycles")

- 5.2.9 *Number of treatments of antibiotics*

("a. Maintain records of all treatments of antibiotics (see 5.2.1a). For first audits, farm records must cover the current and immediately prior production cycles in a verifiable statement."

All of the indicators above are listed as "conforming" - despite not having available all the sufficient records and evidence required.

CAB

As above, this information will obviously not all be available for a site in its first production cycle and will be reviewed at surveillance.

LOS

c) Incomplete Production Cycle Data – Intermediary Stage

It is common practice in British Columbia for salmon farming production cycles to include an intermediary stage (such as nursery, transfer or early grow-out pens). For the primary product being assessed, all stages of the production cycle should be included to ensure compliance to the ASC salmon standard indicators and the chain of custody.

There is no mention of an intermediary stage in the draft audit report. However, we understand Marine Harvest's well boat, Roy Kristian, made two trips from Shelter Bay to Bull Harbour on September 25th, 2015. We request clarification on whether there was a split of fish at Shelter Bay and confirmation if the Shelter Bay farm was used as an intermediary stage for the current Bull Harbour production cycle. If so, the records and evidence from the intermediary farm should be included in the audit report to demonstrate compliance. Evidence should include the drowning of 6 California sea lions at Shelter Bay in July 2014 (see Indicator 2.5.6 below).

CAB

The farm being audited is Bull Harbour and there is no requirement to include Shelter Bay within this process. This has been addressed in previous dialogue between LOS and another CAB, which determined that the unit of certification is the farming site, and that intermediate sites do not fall under the scope and are therefore not included in the audit.

LOS

d) Exclusion of harvest activities from initial audit

The ASC CAR V2.0 requires that *“The CAB’s initial audit should include harvesting activities of the principle product to be audited.”* (Audit Timing 17.4.2).

Again, by conducting the audit before the harvest and completion of the farm’s maiden production cycle, there is incomplete evidence to conclude the farm is conforming to the salmon standard indicators. The indicators listed above in 1a) are not able to be assessed until sufficient records and evidence from the completed production cycle are available.

While we acknowledge the audit report meets CAR 17.4.6 requirement of listing and providing an alternative timing, we submit the justification of *“...intending to have certified product on the market...”* compromises the integrity and rigor of the ASC and salmon standard.

For reasons detailed in 1a)-d), we submit the CAB failed to meet their obligations under 17.4 of the CAR. Similarly, MHC failed to meet their client obligations listed under CAR 17.1 (Unit of Certification).

CAB

In our opinion post-harvest indicators cannot be calculated until final harvest information and other end of cycle indicators are available and that this information will be reviewed at surveillance in accordance with 17.13.

In addition, the complete audit process includes an assessment audit and the two surveillance audits, the rationale being that the whole farming process will be captured within this and this is recognised within the updated CAR. *“Conforming”* should be taken to mean *“conforming at the date of on-site audit”* when all relevant data was reviewed and found compliant.

LOS

2. Non-Conformities

Indicators 2.1.1 – 2.1.3 (Benthic Monitoring)

Due to the audit being conducted prior to harvest and peak biomass, indicators 2.1.1-2.1.3 did not have sufficient evidence for compliance (as required by the CAR 17.4.5). We note a Minor Non-Conformity has been raised for indicator 2.1.1 and is listed as *“Open”* with a deadline of 12 months.

It should be noted that the text within Nonconformity Report Form for NC1 was incomplete, as the text was cut off, making it difficult for review. Nevertheless, the NC1 states:

*“A minor NC has been raised. The audit has been scheduled prior to the farm reaching peak biomass. **Compliance cannot be assessed for 2.1.1, 2.1.2 or 2.1.3.** The farm has demonstrated an understanding of the requirements and an intention to sample at the appropriate point in the production cycle”*

Given the inability to assess compliance for all three indicators, we question why indicators 2.1.2 and 2.1.3 are listed as *“compliant”* in the audit report.

CAB

Text made clear in the report. Corrective action has now been submitted for the minor non-conformity raised.

LOS

Indicator 2.2.3 For jurisdictions that have national or regional coastal water quality targets, demonstration through third-party analysis that the farm is in an area recently class

The salmon standard indicates jurisdiction water quality targets should include nutrients N, P, chlorophyll A. The Canadian Councils of Ministers of the Environment (CCME) guidelines require only nitrate concentration and therefore should be deemed inadequate. 2.2.3b references The 'Nutrient release for net cage culture' by GlobalAquafood Development Corporation April 2014. Another ASC audit report (Duncan Island) also references this report and notes it as a literature review by Dr. Stephen F Cross (Founder of GlobalAquafood) of papers dating from 1982-2005. Footnote 17 requires evidence to be from within the last 2 years prior to the audit. Given the report relies on data 11 years and older, we submit this report to be inadequate. Additionally, the analysis report is required to be from a third-party. We query the third-party impartiality of the analysis report given that GlobalAquafood and the author appear to be in a conflict of interest given their strong support¹ for the BC aquaculture industry.

Therefore, compliance to 2.2.4 should be required

CAB

It is unclear from the submission as to whether Living Oceans are claiming that the analysis report contains false information or that Dr. Cross is not competent to carry out an unbiased analysis. As Dr Cross is not employed by MH Canada the audit team feel there is no conflict of interest which would negate his findings. This complaint has been made and addressed in earlier communications (April 2016, Monday Rock). LOS is correct that this is the same paper referenced in the Duncan Island audit report, and it will be updated in 2016- within the 2-year time requirement.

LOS

Indicator 2.5.6 Maximum number of lethal incidents on the farm over the prior two years

As mentioned in 1c) above, if another MHC farm, Shelter Bay, was indeed used as an intermediary farm before being transferred to Bull Harbour, then the evidence that 6 California sea lions drowned at Shelter Bay in July 2014² would result in non-compliance for 2.5.6. This event occurred within the two- year period immediately prior to the Bull Harbour audit.

CAB

The farm being audited is Bull Harbour and there is no requirement to include Shelter Bay within this process. This has been addressed in previous dialogue between LOS and another CAB, which determined that the unit of certification is the farming site, and that intermediate sites do not fall under the scope and are therefore not included in the audit.

LOS

Indicator 3.1.7 In areas of wild salmonids, maximum on-farm lice levels during sensitive periods for wild fish and Compliance with the Variance

The draft audit report cites Variance Request 141 for Bull Harbour's compliance under indicator 3.1.7. In VR 141, the CAB recommended:

"Therefore, we recommend that Monday Rocks farm to be certified with a higher sea lice trigger based on the legal definition of 3 motile lice per fish within the context of clause PI 3.1.7"

The Variance Request was approved by the ASC, with a reference to deferring to the Pacific Aquaculture Regulations (PAR):

¹<http://www.aquacultureassociation.ca/assets/Uploads/AAC-Bulletin-112-1.pdf>

² http://www.pac.dfo-mpo.gc.ca/aquaculture/reporting-rapports/docs/mar_mamm/drowning-noyade/2014-Q3-T3-eng.html
Acoura Marine

“Canadian regulations differ from the ASC standard in that up to 3 mature female sea lice per fish are allowed before treatment is triggered. Only one chemical treatment is allowed”.

CAB

LOS is correct that ASC has made an error in the conclusion of their variance request, but it is clear in the detail of the audit report that we have audited against the correct terminology, 3 motile lice, (this error should be corrected by ASC to prevent future confusion). As discussed, the PAR sets a management action threshold. When the threshold was exceeded, action was taken (note that, again, this was post-audit, and therefore outside the scope of the public comment). This comment was also recently addressed in the Aug 2016 SAI comment on the Cermaq Canada audit.

LOS

It is important to note that the quoted statement by ASC is erroneous. The PAR trigger for management action is 3 motile lice per fish; and BC salmon farmers have access to two therapeutants, SLICE and hydrogen peroxide, with the ability to treat as often as required to control lice within the threshold. **In any event, the conclusion from the Variance Request was to defer to the PAR requirement of 3 motile lice vs. the Salmon Standard of 0.1 adult females /fish.**

Based on the referenced approved variance, it can be expected that the Bull Harbour farm would need to demonstrate meeting the PAR requirements of 3 motile lice per fish in order to be conforming to 3.1.7 of the ASC Salmon Standard.

CAB

Yes, Bull Harbour uses the three motile lice per fish as a trigger for treatment so are compliant.

LOS

Bull Harbour breached the PAR threshold in June 2016 (4.5 motile lice per fish) and July 2016 (5.21 motile lice per fish)³. **Therefore, compliance to the variance of the PAR threshold was not met.**

CAB

The threshold for treatment initiation has been reached. This threshold is a treatment trigger rather than a maximum lice level permitted on farm not to be exceeded’ however this occurred after the onsite audit was completed and will be factored at surveillance as necessary.

LOS

Indicator 8.4 Maximum total amount of phosphorus released

The draft audit report only provides a calculation for the Ocean Falls hatchery. Please provide the Dalrymple site calculation to demonstrate transparency and robustness.

CAB

The calculated value for phosphorous released for the Dalrymple site was inaccurate, being artificially low due to difficulty in determining the volume of each load of sludge pumped and the volume being incorrectly calculated, as a consequence a minor non-conformity was identified.

Note that an estimated extrapolated calculation by the auditor using the correct methodology gave a compliant figure (<1.27 kg per tonne of smolt produced).

LOS

Indicators 8.15-8.23 Smolt Production; 8.32-8.33 Additional Requirements for Smolt Producers

These indicators are not appropriately assessed as it simply refers to all being “internal” in nature (8.15-8.23). Whether the smolt producer is MHC or ‘internal’, the ASC salmon standard indicators are still required to be completed (e.g. antibiotics used, amount, etc) to demonstrate compliance.

Likewise, the audit report fails to demonstrate compliance with indicators 8.32-8.33, which are listed as

³ http://marineharvest.ca/planet/environmental_commitment/additional-data-reporting/

“As included in the ASC submission”.

CAB

All indicators included here require information that was previously audited against the farm site. Because the smolt supply is “internal”, as stated, there is no need to restate the same data here.

LOS

Indicator 8.34 Macro-invertebrate surveys downstream

The CAB listing of indicator 8.34 as “compliant”, appears in contradiction of the comment: “2015 results showed some downstream impact at Dalrymple...”. The audit draft notes updated reports are expected in November 2016. We question why a non-conformance was not raised.

CAB

As outlined in Appendix VIII-3, “Samples must be collected once every year upstream and downstream from the farm outlet. In case the downstream survey drops a category according to the faunal index, two consecutive faunal surveys must be conducted during the following 12 months”, this requirement has been met and the farm is currently awaiting results.