TOWARDS A SOCIALLY RESPONSIBLE AQUACULTURE STEWARDSHIP COUNCIL

The Aquaculture Stewardship Council (ASC) is a certification initiative which aims to promote responsible aquaculture. Oxfam regards ASC as an initiative to transform the sector, but there is a need for urgent improvements on social aspects such as fair contracts for farmers, decent labor rights in the industry, and effective and transparent stakeholder consultation including farmers, workers, communities, and civil society. Currently, smallholder farmers are effectively excluded from certification, the burden of change is put on farmers rather than shared throughout the chain, and the quality and effectiveness of social impact assessments are lacking. This paper presents several recommendations on how ASC should address these issues, so that it can truly claim to promote social responsibility.
1 BACKGROUND

Aquaculture—the farming of seafood—is one of the fastest-growing food sectors worldwide. It not only provides an important alternative to wild-capture fisheries, which is depleting the oceans through overfishing, but it also serves as an important source of protein, economic development, and employment. However, the growth of aquaculture has resulted in various social and environmental problems. These include environmental pollution through effluents, mangrove destruction, human rights violations on fishing vessels that supply feed for shrimp farming, appalling labor conditions in processing industries, conflicts over natural resources and contract farming arrangements, and increased business consolidation outcompeting smallholder farmers.

Because of a lack of effective government regulation and enforcement, alternative governance initiatives, such as certification, have been established by nongovernmental organizations (NGOs) and industry actors themselves. Certification schemes aim to reduce the key negative social and environmental impacts of aquaculture through compliance with standards and verification by a third, independent, and accredited party. Compliance usually results in products that can be labelled and marketed as sustainable or responsible to consumers. Increased demand for such products would foster continuous improvements in the sector, eventually leading to sector-wide transformations.

One of the most significant certification initiatives in aquaculture is the ASC. It was established as the result of the Aquaculture Dialogues—a multi-stakeholder dialogue where responsible seafood farming standards were agreed for several key species. This dialogue was initiated by The World Wildlife Fund (WWF) and the Sustainable Trade Initiative (IDH). Oxfam has been actively participating in these dialogues and contributing to the establishment of the ASC to ensure the uptake of socioeconomic issues, next to environmental ones. This has resulted in standards that extensively cover social issues, such as labor rights, contract farming, and community impact, although coverage varies per species. ASC differs from other certification initiatives in aquaculture because it aims to transform the entire sector (rather than a niche). Given its global reach and multi-stakeholder character, ASC offers various opportunities for concerned parties to provide input.¹

ASC-certified products are mostly sold on the European market. Although exact numbers are unavailable, retailers and importers are increasingly demanding certified products, which means producers must comply with ASC standards to be able to sell their products.² The ASC label represents a claim that the seafood is farmed responsibly. However, in various ways, the social responsibility ensured by ASC certification is lacking.

1.1 WHAT WE STRIVE FOR

Oxfam regards multi-stakeholder certification schemes such as the ASC as a tool to potentially drive sector-wide transformation towards inclusive value chains by promoting responsible business conduct. Therefore, Oxfam engages with these initiatives with the following general goals:

1. **Due diligence on human rights.** To ensure that human rights in value chains are respected, companies must understand, monitor, and mitigate their human rights impacts. This relates to the rights of both workers (labor rights as defined by the International Labour Organization—ILO) and communities affected by a company. According to the UN Guiding Principles on Responsible Business Conduct, the
role of governments is to protect human rights, whereas the role of the private sector is to respect them. In addition, people whose human rights have been violated should have access to appropriate and effective remedy.

2. **Smallholder inclusion and a living income.** Approximately two-thirds of the world’s rural households—the majority of whom live in poverty—depend on smallholder agriculture for their food and income. Consequently, linking smallholders with well-functioning local or global markets—ranging from local street markets to formal global value chains—and ensuring this allows them to earn a living income, play a critical part in long-term strategies to reduce rural poverty and hunger. More and more young people are leaving farming because they see no opportunity to earn a living income through it. There is also a business case for smallholder inclusion, as it helps companies to receive a “social license” to operate, and to diversify their portfolio of suppliers, ensuring continued supply of food in the context of population growth and climate change.

3. **Gender transformative change.** Agricultural production depends heavily on women’s labor. Therefore, ensuring that women can overcome gender-based constraints, such as access to training, will increase productivity and the overall efficiency of supply chains. Addressing the challenges of land and crop ownership for women can create new or increased sources of production, unleashing the economic value of women farmers. To transform unequal power relations between men and women, it is important to not only ensure women’s participation but to also challenge and change existing attitudes and beliefs, laws, and policies, as well as norms and structures that locate women in positions of lesser value and perpetuate inequality.

4. **Different value distribution.** Benefits in value chains are often unequally distributed. Both laborers as well as self-employed farmers have an insufficient income to meet the basic living needs of their family. Oxfam advocates living wages (for laborers) and living incomes (for farmers) to assure a different and more just value distribution in which the actors upstream in the value chain benefit as well. Fairtrade International already incorporates working towards a living wage in its standard.3

5. **Different enterprise models.** Alternative structures of business have emerged that not only reinvest more into their business but also benefit stakeholders other than shareholders. Examples include social enterprises and cooperatives.

### 1.2 WHAT NEEDS TO BE CHANGED

With these five goals in mind, we have identified four major points of concern regarding ASC’s claim of social responsibility. We call on ASC to:

1. **Keep and harmonize high social standards.** Social issues are not coherently addressed in ASC’s standards for the different seafood species. The current efforts to deal with the incoherence between the standards by developing one ASC core standard to replace the species-specific standards can potentially address this. However, it is important to ensure that the core standard will not be based on the lowest common denominator. The coverage of social issues is most extensive in the shrimp standard. Therefore, we suggest taking that standard as a starting point.4

2. **Make the ASC accessible to smallholders.** The accessibility of the ASC for smallholder producers remains a challenge because of the high costs and the complexity of the standard. Oxfam is working with the ASC to develop a methodology for group certification, allowing smallholder farmers to pool their resources and share their skills to obtain certification. However, efforts to implement group certification appear to be fraught with difficulties, as the process
is already taking four years. What is more, ASC certification does not necessarily lead to improved incomes of farmers, whereas most of the burden is put on them.

3. **Extend the scope beyond the farm.** ASC solely incorporates social criteria at the farm level. Shrimp farming is part of a wider value chain. Inputs such as feeds and shrimp larvae are produced in feed mills and hatcheries. Using these inputs, shrimp is farmed on a farm. Subsequently, a trader collects the shrimp and sells it to a manufacturer who processes the shrimp. The processed shrimp is exported and imported before it ends up in retail. The ASC’s blindness to social issues in other parts of the chain is an urgent issue that needs to be addressed, considering various human rights violations in the vessels that supply feed and in the shrimp-processing industry.

4. **Improve the participatory Social Impact Assessment (p-SIA).** The quality and use of p-SIA that deals with community impacts of aquaculture need to be improved to achieve the desired impact. Gender equality is not yet addressed in this methodology.

The first point is a clear signal to the ASC: do not lower standards, and ensure coherence. This paper discusses the latter three of these challenges in more detail: smallholder inclusion, social responsibility beyond the production level, and the effectiveness of the p-SIA methodology. We provide several recommendations. The findings draw from research commissioned by Oxfam, which is based on interviews with experts and a review of relevant ASC documents (such as audits and p-SIA reports); involvement in the ASC technical working group for group certification; and Oxfam’s experiences with smallholders and p-SIAs in Southeast Asia.
2 MAKE ASC ACCESSIBLE FOR SMALLHOLDERS

Smallholders are vital to the environment and to society. They sustain the independence of individuals, families, and villages; support a high number of direct and indirect jobs; and maintain cultural heritage and landscapes. The negative impact on the environment and communities from a smallholder farm with none or one employee is often negligible. However, smallholders produce a significant share of the total production in aquaculture. Thus, ensuring inclusive and responsible business conduct through certification necessitates an accessible certification scheme. This is also needed to prevent the ASC from becoming a driver of unfair market competition. Currently, the ASC is insufficiently accessible to smallholders. Efforts to address this have been made by setting up group certification. However, this process is slow and several challenges remain unaddressed. This is caused by the unbalanced costs and benefits of the ASC for smallholders and the applicability of the standard to smallholder production systems, combined with a lack of smallholder representation.

2.1 REDISTRIBUTE COSTS AND BENEFITS

ASC certification can provide market access and gives producers the opportunity to scrutinize and improve production practices. However, this benefit does not usually outweigh the high costs and complexities of certification. The distribution of costs and benefits of ASC certification currently serves to exclude smallholders. There are two main reasons for this.

First, ASC certification is too burdensome for smallholders to achieve. The current ASC shrimp requirements amount to 191 pages. These 191 pages are written in complex English and include several errors and ambiguities. The standard is not fit for purpose for smallholders or even larger individual farms without dedicated staff or a quality assurance team. Hence, the current ASC standard is acting as a market barrier to such producers, favoring large companies with multiple farms, which are able to employ internal capacity to handle the ASC requirements. The only way a smallholder can become certified is by working with support from the outside, typically from a processor or an NGO. This is not a sustainable approach and drives dependence. There are attempts to find solutions to the problem by introducing group certification. However, this will add additional layers of complexity.

Second, the ASC does not ensure added value for producers, whereas there are high costs in terms of improvements needed to get certified, as well as the costs of audits. The ASC’s change model does not include premium pricing; it leaves this task to the market. While expectations were high to start with, Oxfam’s experience is that the market is, in most cases, not prepared to pay a higher price for ASC-certified seafood, despite benefits to the environment, employees, and communities. This is especially the case for retailers and traders in importing countries, whereas there are some instances of processors paying higher prices to producers, for example in Vietnam. The result is that these processors get squeezed by the market. Current requirements and associated costs outweigh the market reward, which means that uptake of ASC certification is lower than it could be. More generally, producers are regarded as the subject of certification and the targets of change, whereas the responsibility to shift the sector towards sustainability should be shared by all value chain actors.
To redistribute the costs and benefits of ASC certification for smallholder farmers, we suggest the ASC takes up the following recommendations:

1. **Outline a strategy to reduce complexity for smallholders.** This should be done before introducing group certification to avoid unnecessary additional complexity. The Roundtable on Sustainable Palm Oil (RSPO) serves as a good example of how to do this through identifying core sustainability requirements.  

2. **Guarantee premiums.** This provides an incentive for producers to acquire ASC certification and invest in improvements. Experiences from Oxfam’s GRAISEA programme show the possibility and potential of premium pricing.

3. **Share the costs of certification throughout the value chain.** Instead of farmers having to bear the burden of the transition towards sustainability on their own, other actors in the chain—such as retailers, traders, and processors—should contribute by paying the costs of audits and improvements. Again, experiences from Oxfam show that such an approach is feasible.

4. **Create a different, additional system to the ASC to communicate the value of smallholders to the market.** Currently, the ASC claim of responsible aquaculture does not sufficiently communicate and give credit to the value of smallholder production to the market and consumers. It should be explored how this additional value can be communicated by an “ASC+” system that is based on increased social responsibility or by a separate, possibly independent claim.

5. **Set up improvement programs.** Improvement programs can help smallholders deal with the difficulties they face in accessing the ASC. Programs can help (groups of) smallholders achieve compliance with ASC standards by offering support for step-by-step improvements. Approaches such as transition funding and training and implementation support can be included. Existing experiences with fisheries improvement programs (FIPs) and aquaculture improvement programs (AIPs), such as those carried out by WWF, could be used to develop a (smallholder-specific) improvement program.

Training Indonesian shrimp farmers to obtain certification. Photo by Michael Glowacki.
2.2 MAKE ASC APPLICABLE TO SMALLHOLDERS

The current ASC certification scheme is not always sufficiently applicable to smallholders and their production systems. Aquaculture production systems also vary per region. The current standards seem to have been developed with a particular image of production systems in mind that does not always correspond to smallholder realities. For example, in shrimp farming, there are intensive, semi-intensive, and extensive production systems. The current ASC standard and requirements are designed for intensive production systems, which means that it is more difficult for extensive farms to get certified. Extensive shrimp farming is done in large ponds with low-stocking densities. Contrary to intensive farming, supplemental aeration, feed, and antibiotics are hardly required. This means that some of the criteria in the current standard are not applicable and hard to understand for smallholders that do not have the capacity to unravel the ASC standard. This also means that the ASC is creating unfair competition by indirectly promoting intensive production methods.

Similarly, the current efforts to introduce group certification do not sufficiently consider smallholder realities. The desire to have globally applicable standards for all farming systems and company sizes is driving the complexity and, therefore, the need for capacity and documentation beyond what is effective for the typical smallholder farm.

To make ASC applicable to smallholders, we recommend that ASC do the following:

1. **Create tools better adapted to different production systems, cultures, and traditions.** ASC should develop a separate standard for specific but widespread production systems, such as extensive shrimp farming. For others, a simple filter, asking a short list of questions that leads to the selection and de-selection of relevant requirements, could prove to be a very supportive method. This could help filter out non-applicable requirements and reduce the long, complex standard to a more practicable tool.

2. **Make group certification accessible for smallholders.** Rather than allowing multi-million-dollar businesses to make use of the group certification tool, it should serve the purpose of making ASC certification more accessible to groups of smallholder farmers. The incentive to do otherwise should be re-assessed.

2.3 ENSURE SMALLHOLDER REPRESENTATION

Producers, particularly smallholders that make up the majority, have been inadequately represented in ASC’s standard-setting. For example, in the Aquaculture Dialogues for pangasius, farmers made up the smallest group, comprising only six per cent of total attendees. In general, producers from Asia were absent and Southern countries were underrepresented. This is one of the reasons for the lack of applicability of the ASC to smallholder production systems and realities.

The current stakeholder involvement policies are not suited to include the voices of smallholders. Therefore, we urge the ASC to:

- **Create mechanisms for smallholders to provide feedback on the standards.** This could, for example, be done by actively engaging with ASC-certified farmers, as well as with farmers that are not yet certified.
3 EXTEND THE SCOPE BEYOND THE FARM

The ASC standard is currently only applicable at the level of production: the farm. Shrimp farming is part of a wider value chain in which various social issues need to be addressed. No facility in the entire supply chain, except for the farm and in some cases the nursery, implements and is assessed against social standards. Other actors in the value chain, such as the suppliers of feed and the processing industry, should also be included in the ASC standard.

There are worrying recent reports of human and labor rights violations in various parts of the value chain, particularly in the processing industry and on the vessels that supply the feed. Moreover, the feed used for shrimp farming is partly produced by “trash fish,” low-value fish caught at sea using illegal nets and fishing equipment that also drag in juvenile fish. Currently, the ASC uses the Marine Stewardship Council (MSC) Chain of Custody to ensure that certified products can be traced through the value chain from producer to consumer. However, the MSC Chain of Custody does not include social issues. This means that socioeconomic issues present in the industry during processing, export, and import are not covered by ASC.

We recommend that the ASC extends its scope beyond the farm and to:

1. **Address all social risks throughout the entire value chain, particularly possible human rights violations**, to guarantee the ASC’s claim of social responsibility. This includes compliance with national labor laws. Oxfam has experience with ASC auditors not considering relevant labor legislation. Recent research also shows that ASC certification does not always take into account conflicts between farmers and the nucleus company that contracted the farmers.

2. **Assist MSC with the uptake of social issues in its Chain of Custody** both upstream in the chain on the vessels, as well as downstream. MSC has recently organized consultations on labor requirements for fisheries and supply chains, as well as on programs to include small-scale fisheries.
4 IMPROVE THE PARTICIPATORY SOCIAL IMPACT ASSESSMENT

The Participatory Social Impact Assessment (p-SIA) is the most important tool to address negative community impacts of aquaculture; hence, it is one of the requirements to achieve ASC certification for certain species. Currently, the p-SIA is inconsistently used by the ASC, as it is a requirement for the shrimp and pangasius standards but not for other species.21,22

Likewise, the p-SIA is often connected to the Biodiversity Environmental Impact Assessment, as it especially relates to the impact of farms on surrounding communities (see Box 1 for the relevant criteria in the shrimp standard). The p-SIA is defined by ASC as follows:

“An assessment of positive and negative consequences and risks of a planned or ongoing farm or farm development undertaken in such a manner that all stakeholder groups have input in process, results, and outcome of such an assessment, and that steps taken and information gathered is openly accessible to all.”23

The assessment is conducted by a team of experts that visits the location, facilitates interviews and focus group meetings, and uses participatory rural appraisal techniques such as resource mapping and transect walks with the stakeholders involved (see Box 1 for the steps). Subsequently, an external auditor checks all of the criteria of the standard, including if the p-SIA has been carried out according to the requirements. ASC states that, if done correctly, the effect of a p-SIA will be mutually beneficial to the social wellbeing of the community and to the producers because of the reduced risks and costs for the farm. Although the p-SIA is an essential entry point to analyze and discuss social challenges with stakeholders, the tool has limitations in terms of its effectiveness as it is currently used and its embeddedness into the certification process.
Box 1: Criteria and Steps of the p-SIA

Criteria
The p-SIA is used to assess several criteria contained in principle 3 of the shrimp standard: “develop and operate farms with consideration for surrounding communities.” These criteria include the following:

3.1: “All impacts on surrounding communities, ecosystem users, and land owners are accounted for and are, or will be, negotiated in an open and accountable manner.”

3.2: “Complaints by affected stakeholders are being resolved.”

3.4: “Contract farming arrangements (if practiced) are fair and transparent to the contract farmer.”

Steps
1. Stakeholder analysis
2. Description of farm and effects
3. Initial listing of probable social impacts. These can be: economic aspects, natural resource access and use, human assets, access to physical infrastructure, social and cultural aspects (including gender equity), and governance aspects.
4. Deeper research on important impacts
5. Propose adaptations
6. Agree on impacts and measures to address them
7. Summarize conclusions and agreements

4.1 MAKE THE TOOL MORE EFFECTIVE

The p-SIA is a promising tool to minimize the negative and maximize the positive community impact of farms. However, the current setup of the tool lacks effectiveness for three reasons.

First, the p-SIA methodology appears to be too complex and is lacking in quality. Tasks and responsibilities are not clearly defined. There is no uniform reporting template, leading to big differences between p-SIAs. This creates additional work for the auditor. The most pronounced differences can be seen between NGO-supported p-SIAs (e.g., under the GRAISEA programme by Oxfam) and non-supported assessments. In addition, it is unclear how the p-SIA can be applied to multi-site and group systems. Likewise, communities often do not understand the aim of the p-SIA or are even unaware they are part of a p-SIA.

The common understanding of producers is that they must assure no negative voices speak up because otherwise they would lose certification. Communities use this as an opportunity to ask for gifts from producers. What is more, it seems that in practice, the p-SIA reports are a copy-paste exercise with minimal changes to allow reselling of the reports to multiple farms.

Second, in areas with many farms, a p-SIA on the level of the individual farm is not effective. Individual farms have relatively little impact on the surrounding environment and community. The impact assessment is either very positive because all damage has already been done or very negative as change within the area is hardly feasible.

Third, the p-SIA does not include gender-specific requirements. The impact of aquaculture on women and men can vary, which means impact assessments should also focus on gender differences. Social responsibility means aiming for positive
social impact, so that gender inequalities are addressed and transformed.

To make the p-SIA more effective, we suggest that the ASC adopts the following recommendations:

1. **Develop a step-by-step workplan and a reporting template for the p-SIAs.** This will help to ensure clarity, quality, and consistency. The methodology must also include increased clarity on how to apply p-SIA for multi-site and group systems. Finally, the aim and intention of p-SIAs should be more clearly explained to producers and communities.

2. **Differentiate between different production systems.** To further reduce the complexity of the p-SIAs, the methodology can be adapted to allow more appropriate assessments depending on different production systems (i.e., extensive, semi-intensive, and intensive).

3. **Ensure meaningful training and an approval system for consultants.** This way, the ASC can have some control over the quality of p-SIAs.

4. **Develop an integrated landscape approach.** In areas with many farms, a p-SIA on the level of the individual farm is not effective. In such cases, an area-based or integrated landscape approach is more appropriate.

5. **Include gender-specific requirements in p-SIAs.** Oxfam experience shows that consultants need to be well-trained and creative to effectively incorporate gender elements and tailor these to specific local contexts. Gender Action Learning Systems (GALS) and the Gender Analysis Pathway (GAP) have proven to be effective approaches. These also provide tools on how to incorporate gender equality in p-SIAs and to develop action plans to address gender inequalities. They require specific aspects to be considered, such as the way men and women participate (i.e., equally, interactively, and in a self-mobilizing way rather than participating passively as respondents) and the identification of issues and action points.

6. **Publish all p-SIA reports online.** This allows for stakeholder engagement and verification. A summary and translation should be provided.
4.2 CHANGE THE CERTIFICATION PROCESS

The current integration of the p-SIA in the general ASC certification process should be reconsidered. The p-SIA is only carried out prior to ASC certification. At this moment, annual ASC surveillance audits do not cover social aspects, including the p-SIAs, as these needs a second auditor, which makes the process more costly and time-consuming. Moreover, auditors are not sufficiently aware of and trained regarding social requirements. Community meetings are only initiated a few weeks prior to the first audits, which means that implementation can hardly be verified. Moreover, p-SIA reports are currently not always submitted before the audit, which means auditors must check the reports on-site. Usually there is not sufficient time to do so. Finally, there is increased evidence of certified producers (or producers under assessment) not allowing auditors to apply the ASC process as intended, as well as not allowing certain non-compliances to be raised, especially in Vietnam.

We recommend the ASC changes the certification process by implementing the following recommendations:

1. **Include compliance to social criteria by including the p-SIA in annual audits.** Implementation of p-SIAs should be verified. The p-SIA is not a “one-off” exercise but the start of a process to address social impacts including gender equality issues.

2. Demand the submission of p-SIA reports to the auditor before the ASC audit.

3. **Carry out more unannounced audits** to verify if audit reports and p-SIAs represent the actual situation in the field.
5 INTEGRATE SOCIAL KNOWLEDGE IN ASC

Social requirements should be governed with equal dedication and technical knowledge as environmental ones. Social auditing has mostly been an outsourced activity without auditors having built up the internal knowledge within their technical teams. Within the ASC and Accreditation Services International (ASI) this knowledge is also lacking. Social requirements seem to come as an afterthought in processes and strategies. Several consultant and business services are currently filling the knowledge gaps. The result is that the auditing of social criteria is lacking in quality (see Box 2). For example, Oxfam is aware of cases in which auditors apparently missed important social problems because of a lack of insight in the representativeness of the stakeholders consulted during the audit.

Box 2: Effective and transparent stakeholder consultation

Based on recent experiences with ASC certification processes, Oxfam concludes that there is a lack of guidance on stakeholder consultation for auditors from ASC. Despite various publicly known problems, auditors decided to grant ASC certification because they were unaware of these issues. This seems to be the result of inadequate stakeholder consultation. ASC should thus develop improved guidance on social auditing, which includes a check of publicly available materials and guidance on ensuring transparent and independent stakeholder consultation. Auditors should demonstrate how the stakeholders they have consulted are representative of their stakeholder group. The burden of proof should not be with civil society organizations pointing out the problems, but with auditors that allow a company to claim it is responsible.

To deal with the various challenges regarding the assurance of social responsibility by the ASC, we recommend building up an ASC knowledge center to address unwanted negative consequences resulting from unanswered questions, varying approaches, and varying levels of compliance, as well as quality performance. This is a first step towards a more socially responsible ASC and should be complemented by all other recommendations provided in this paper.

Why a knowledge center? The current idea that auditor training is the main component needed to run the certification program is erroneous and has led to knowledge deficiencies throughout the certification system. In addition, auditor trainings are incomplete, leading to an additional knowledge gap. Moreover, the focus is on the environmental aspect, and social elements are not covered in trainings. Based on interviews with auditors, we conclude that questions apparently remain unanswered during and after trainings, and guidance to implementation and verification is largely missing during trainings. Consequently, a side business has developed where auditing and other organizations currently offer ASC training. This situation is evidence for the lack of accessibility to adequate training, which leads to a non-uniform approach and interpretation of the standards.

In addition, smallholders are least likely to be able to afford this additional business service, which has arisen due to knowledge gaps within ASC. Further interviews and documentary evidence indicate that the perception of gender topics on the side of auditors and consultants is limited to equal pay and/or equal access to work. Traditional role allocation was considered normal and not questioned; in some cases, this is paired with the explanation that women had been present but would
not want any change themselves. Gender sensitivity and methodology training seems to be a gap at the moment. Similarly, there was no specific feedback to contract farming. It also appears that the concept of contract farming is unclear, given the number of times we were asked what we meant by it. Hence, there is a need for a support team within the ASC that is knowledgeable on all species, all aspects of standards (not only environmental ones), and required procedures, and can assure a reasonable response time to questions.

In addition, we suggest a training program for all active players in the certification system (i.e., outreach, communities, producers, consultants, auditors, accreditors, stakeholders). This training should be:

1. Always accessible to all
2. For all aspects of the requirements (rather than only for environmental requirements, for example)
3. Mandatory for all listed consultants, auditors, and relevant ASC certification and accreditation body staff
4. Focused on how to implement and how to verify implementation of the standard in order to add value to the already described theoretical requirements on paper
5. Include specific gender awareness and methodologies

Next to the training, an approval system for auditors and consultants is needed. Taking up these recommendations would result in a more systematic approach towards social issues, instead of the current ad hoc approach.
6 RECOMMENDATIONS

ASC still has room for improvement. Some of the most pressing issues are the effective exclusion of smallholder farmers from certification, the burden of change that is put on farmers rather than shared throughout the chain, and the lack of quality and effectiveness of social impact mitigation measures. This paper contains several recommendations for ASC to address these issues. Oxfam urges the ASC to take up these recommendations, so that it can truly claim to promote social responsibility in aquaculture.

First, social criteria should not be dropped in the process of harmonizing the different standards per species into one core standard. For example, the p-SIA should be included in this core standard. We recommend that the ASC adopts the shrimp standard as an example.

Second, ASC certification needs to be attractive and accessible to smallholders. To do this, the ASC can provide incentives in the form of a premium, promote sharing of costs, and reduce complexity of processes. The ASC should adapt its standard to the production realities of smallholder farmers. This means that some criteria might be dropped or changed to reduce complexity. Ensuring farmers have a say in the ASC will help tailor the standard to their realities. But more is needed: smallholders need to be supported in their efforts to achieve certification through improvement programs and financial compensation for audit costs and through premium pricing. In the end, ASC-certified farmers should be able to provide themselves with a living income. To make this possible the value of smallholder production should be emphasized more by the ASC.

Third, we urge the ASC to extend its scope beyond the farm. Social risks throughout the entire value chain should be addressed. ASC is currently developing a feed standard, but actors downstream in the chain such as processors should also be included. Transforming the aquaculture sector so that it becomes sustainable is a shared responsibility, and all parts of global value chains should comply with social standards.

Fourth, the ASC should improve the effectiveness and quality of the p-SIA. This can partly be achieved with relatively simple measures, such as clarifying procedures and reporting guidelines. We also urge the ASC to include gender-specific elements in the p-SIA. Furthermore, p-SIAs should be part of annual audits to verify implementation, and more unannounced audits are necessary.

To deal with the lack of knowledge and capacity regarding social issues, Oxfam recommends that the ASC set up an ASC knowledge center. This would be an important step in the right direction of ensuring social responsibility. However, this is only the first step, and there is more to be done. Taking up the recommendations in this paper can guide ASC on the pathway towards social responsibility.
NOTES

1 There are other certification initiatives in aquaculture, such as the Best Aquaculture Practices (BAP) created by the Global Aquaculture Alliance (GAA), an industry organization; Naturland, an organic certification; GlobalG.A.P., a business-to-business certification; and various national and regional standards like the Thai GAP, Viet GAP and ASEAN GAP.


3 Fairtrade International, Fairtrade Standard for Hired Labor, v1.3. “If remuneration (wages and benefits) is below the living wage benchmarks as approved by Fairtrade International, your company ensures that real wages are increased annually to continuously close the gap with living wage.”

4 The Certification & Ratings Collaboration—of which ASC is a member—is developing a framework for social responsibility in the seafood sector. This promises to be a comprehensive framework of social issues to be addressed in seafood sustainability initiatives. We recommend ASC makes full use of this initiative.


6 Seafood Advisory Ltd. Evaluation of uptake of social criteria in Aquaculture Stewardship Council shrimp certification. The report is based on audit reports about concluded p-SIAs, debates in the ASC technical working group on group certification, and interviews with auditors and other experts.

7 As part of the Gender Transformative and Responsible Agribusiness Investments in South East Asia (GRAISEA) programme, p-SIAs with gender elements were conducted in Indonesia and Vietnam. Oxfam partnered with ICAFIS and MCD in Vietnam and with WWF Indonesia. For more information about GRAISEA, visit www.oxfam.org.uk/graisea.


12 Freshwater catfish native to south and southeast Asia.


16 MSC certifies wild capture fisheries.

17 The ASC is currently organizing feed dialogues to develop a feed standard. The feed standard has gone through two rounds of public consultation and will soon be finalized. Oxfam is
closely monitoring the development of the feed standard through participation in the steering committee.


20 Ibid.

21 The salmon and seriola and cobia standards mention the p-SIA as an option that may be considered. The freshwater trout and bivalve standards incorporate community consultation but do not mention the p-SIA. The abalone and tilapia standards do not mention community consultation at all.

22 The findings described in this paper are based on experience with the shrimp standard. We do, however, consider the recommendations to be applicable to other species and standards.


24 Ibid, pages 37, 39, and 40.

25 It is important to note that farm size itself does not necessarily determine impact. For that reason, not requiring an assessment of impacts on the environment and communities for certain farm sizes is not the correct solution.

26 These summaries could include: (1) an explanation of the intents and process of p-SIA, (2) a summary of the community defined, (3) a summary of the results of community interviews, (4) all concluding recommendations, and (5) annual update of status of all concluded recommendations.


28 Trainings are only meaningful if questions raised can be answered and if ambiguous issues are addressed.
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