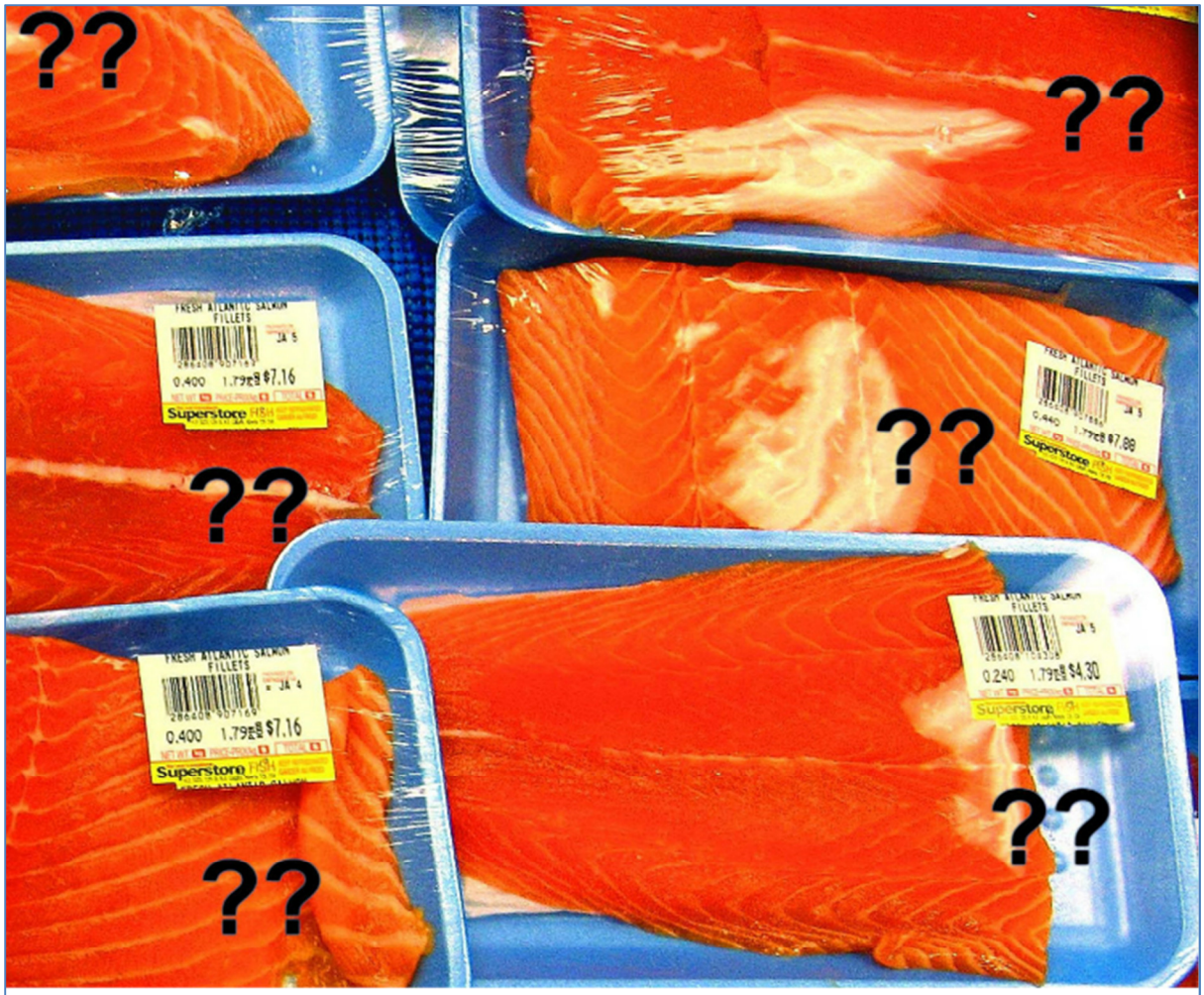

MISLEADING CONSUMERS:

TASSAL & THE FAILURE OF ASC IN MACQUARIE HARBOUR

(01) 0 9501101 53000 3 (17) 140704 (10) AB-123

ENVIRONMENT TASMANIA

MISLEADING CONSUMERS:

Tassal and the failure of ASC in Macquarie Harbour

INTRODUCTION

In the lead-up to the Aquaculture Stewardship Council's (ASC) audit of Tassal's certification for its salmon farms in Macquarie Harbour, Environment Tasmania is releasing the results of its investigation into the failure of ASC process to protect Macquarie Harbour and what this means for consumers who place their trust in products carrying the ASC brand.

Tassal's Macquarie Harbour farms were the first in Australia to receive ASC certification. As the first company globally to have all of its operations certified, Tassal's brand has become synonymous with the ASC brand in Australia.

Founded in 2010 by the salmon industry and global conservation group WWF, ASC certification is designed to promote the best environmental and social aquaculture performance. According to WWF, "Consumers opting for ASC-certified products can be assured that they're purchasing seafood from farms that manage their impact on surrounding environments and communities."

Unfortunately, the evidence of environmental harm done by intensive salmon farming in Macquarie Harbour, on Tasmania's West Coast, raises serious concerns about the rigour of ASC processes and the reliability of the ASC logo for consumers.

The latest evidence by Tasmania's Institute of Marine and Antarctic Studies shows that all marine life under Tassal's largest lease in Macquarie Harbour is dead, with oxygen levels nearing zero and a dead zone extending for 500 metres beyond the lease site.[1] Despite clear evidence that oxygen levels in Macquarie Harbour have remained below those required by ASC standards, and alarm bells raised by local scientists about the impacts on endangered species,[2] Tassal has passed two surveillance audits by ASC auditors and retained its ASC accreditation.

What follows is evidence of the ecological crisis in Macquarie Harbour and a review of the ASC surveillance reports for Tassal. Environment Tasmania's review shows that ASC-approved auditors granted Tassal exemptions from meeting key ASC standards, disregarded evidence that Tassal was in breach of standards and officially closed investigations of Tassal's non-conformity with ASC standards, even when evidence in the ASC's own documents demonstrated that Tassal remained non-compliant.

We investigate the conflict of interest within the ASC system that sees up to $1.4 million pass between Tassal, the ASC, audit companies and WWF each year. We present the findings of WWF's own review of the failings of its Marine Stewardship Council certification

[1] IMAS Technical Report, (Environmental Research in Macquarie Harbour - Interim Synopsis of Benthic and Water Column Conditions: Jeff Ross & Catriona MacLeod. January 2017)
[2] http://www.abc.net.au/news/2013-07-22/fears-for-skate-dubbed-thylacine-of-the-sea/4834104

process. Our investigation also lists some of the other controversial companies certified as sustainable by SCS Global Consulting, the ASC-approved auditors which Tassal pays to assess their compliance with ASC standards in Macquarie Harbour. These companies include Advanced Biochemicals, a subsidiary of Vinythai, which has a documented history of polluting surrounding villages water with toxic chemicals; and Addax Bioenergy, which has been heavily criticised by ActionAid for worsening hunger in Sierra Leone.

Environment Tasmania has a strong history of working with industry to deliver environmental outcomes. This report concludes with recommendations for restoring confidence in the ASC process, by working to ensure its rigour and independence.

The environmental crisis in Macquarie Harbour

The latest report by IMAS scientists states that Macquarie Harbour has reached a tipping point. There has been no recovery in oxygen levels in middle and deeper waters in the harbour, resulting in a very significant decline in biodiversity, with the abundance of marine life reaching zero at Tassal's largest salmon farm and a 'dead zone' spreading 500 meters beyond the boundaries of the lease area.

This crisis has not developed overnight. Government data shows that oxygen levels in Macquarie harbour dropped to seriously low levels in 2013-2014, one year after salmon production in the harbour was increased by 360 per cent.

Below is a timeline of the unfolding environmental crisis in Macquarie Harbour.

May 2012: Government approves in increase in salmon production in Macquarie Harbour from 8,000 tonnes to 29,500 tonnes.

2013: Industry data shows a significant increase in production in the Harbour is accompanied by plummeting dissolved oxygen levels, with median DO levels dropping from 40-20% in 2010-2011 to 5% in 2013-14.

February 2014: The industry body, the Tasmanian Salmonoid Growers Association, establishes an industry led inquiry into plummeting dissolved oxygen levels in the harbour – the Macquarie Harbour Dissolved Oxygen Working Group.

March 2015: An industry insider leaks parts of the industry working groups report to media. The leaked report documents that licence conditions have been breached at all fish farms across Macquarie Harbour. Feed waste and faecal matter has built up to become clearly visible at all lease sites. Two species of dorvilleids – a worm that feeds off faeces and is used as an indicator of serious pollution – are present at the majority of lease sites and up to 150

metres from lease sites. Bacteria mats have formed at two lease sites. A degraded environment has led to increased incidence of fish disease. [3]

March 2015: Industry sources leak an email from Huon Aquaculture and Petuna Seafoods CEO's to Premier Will Hodgman. The email urges the Premier to act, in the face of serious environmental and fish health warning signs in Macquarie Harbour.[4]

April 2015: Government commissions the Cawthron Institute in New Zealand to review the data on Macquarie Harbour and assess whether "current water quality and benthic monitoring regimes are likely to be effective in detecting harbour wide effects related to salmonid farming."[5]

May 2015: 85,000 fish are suffocated in Macquarie Harbour. Petuna blames a one-off storm event which 'pushed up' lower levels of water with low dissolved oxygen.[6] The company fails to acknowledge the impacts of fish farming in creating low dissolved oxygen at 20 metres.

August 2015: The Cawthron Institute submits its report. It documents "a biological system under stress", with serious impacts up to 7.5 kms from fish farm sites. It concludes that there is a correlation between increased fish farming and the damage seen in Macquarie Harbour, and that current government regulations are not sufficient to monitor these impacts.

"Based on regulatory and other monitoring data presented in reports and synthesis documents (i.e. MHDOWG 2104; Aquadynamic Solutions 2015), it appears there is correlative evidence that finfish farming is affecting the water quality of the harbour environment and is contributing to benthic DO reductions in the system." [7]

"So in the broadest context of the Department's first question the answer is no - the monitoring is not '…likely to be effective in detecting harbourwide effects related to salmonid farming"[8]

August 2015: A rare chronic disease called mycobacteriosis that can cause mortality in fish, is found in farmed salmon in Macquarie Harbour. A Department of Primary Industries internal discussion paper, obtained by the ABC through Right to Information laws, reveals

---

[3] http://www.tasmaniantimes.com.au/index.php/article/New-call-for-Government-to-come-clean#sthash.iD2fl0Gk.dpuf. http://www.openaustralia.org.au/senate/?id=2015-03-02.169.1

[4] http://www.abc.net.au/news/2015-10-24/environmental-concerns-about-aquaculture-expansion-in-tasmania/6874462

[5] http://dpipwe.tas.gov.au/sea-fishing-aquaculture/marine-farming-aquaculture/macquarie-harbour-environmental-and-fish-health-monitoring-review

[6] http://www.abc.net.au/news/2015-05-22/petuna-salmon-deaths-storms/6490138

[7] http://dpipwe.tas.gov.au/Documents/Report%20Cawthron%20Review.pdf. Page 43.

[8] http://dpipwe.tas.gov.au/Documents/Report%20Cawthron%20Review.pdf. Page 15.

that an increase rate of the disease was recorded in 2014 and is linked to degraded environmental conditions in the Harbour.[9]

September 2015: The Tasmanian Government responds to the Cawthron Institute Report. There are no penalties for fish farm companies. None of the improvements to impacts monitoring recommended by Cawthron's scientists are adopted. The government responds by commissioning 'further research'.

April 2016: Government responds to continued evidence of dorvilleids up to 7.5 kms from fish farm sites in Macquarie Harbour, not with fines or a reduction in biomass, but by removing the licence requirements for an absence of dorvilleids:

"the Department has determined that presence of this indicator alone at or beyond 35 metre compliance sites will not constitute a significant visual impact."[10]

April 2016: Government approves an increase in salmon production in Macquarie Harbour, from 20,000 to 21,500 tonnes a year.

May 2016: Environment Tasmania requests information on regulatory breaches in Macquarie Harbour and any management responses required by Government to remedy breaches.

September 2016: Environment Tasmania requests that the Tasmanian Ombudsman review the Tasmanian Government's refusal to make available information on condition breaches in Macquarie Harbour and Government action to remedy breaches.

October 2016: Huon Aquaculture make their leases available to the University of Melbourne for study. The research shows that conditions in Macquarie Harbour in the summer of 2015 consistently breached the maximum temperature and minimum oxygen supply that salmon can withstand before they stop feeding and develop skin lesions. Researchers found that salmon were crushing into the small areas of pens with sufficient oxygen, effectively increasing stocking density 3-4 times beyond the legal limit.[11]

October 2016: Research requested by the Government to determine whether pollution indicator species (dorvilleids) are an accurate indicator of salmon farm pollution in Macquarie Harbour finds that dorvilleids are an accurate indicator of salmon farm pollution in Macquarie harbour. The Government does not reintroduce licence conditions relating to dorvilleids.

[9] http://www.abc.net.au/news/2015-09-07/tasmania-salmon-macquarie-harbour-fish-disease/6754900
[10] Macquarie Harbour Status Report 2016. http://dpipwe.tas.gov.au/sea-fishing-aquaculture/marine-farming-aquaculture/macquarie-harbour-environmental-and-fish-health-monitoring-review
[11] http://www.abc.net.au/news/2016-10-31/salmon-farmer-says-tas-government-ignored-overstocking-warning/7978770

November 2016: Tassal states that the University of Melbourne research relates solely to Huon's leases and states that Tassal fish health was excellent in the harbour. Environment Tasmania calls on Tassal to release the necessary data to support this claim.[12]

November 2016: Tassal releases information on Macquarie Harbour. In breach of ASC requirements, the paper omits information on fish mortalities by lease. Temperature and oxygen figures are also graphed as averages across the harbour, rather than by lease. Data is presented for conditions at 5 and 10 metre depths, but not 15 metres depths, despite publicly available research indicating that the most serious dissolved oxygen issues are mid-water.

Even at 5 and 10 metre depths, Tassal's information shows oxygen levels in the month of December are regularly below the minimum levels required by ASC standards.

November 2016: The EPA receives advice from IMAS scientists that low oxygen levels represent a major risk to the ecology of the harbour.

January 2017: The EPA cuts the on-paper cap on salmon numbers in Macquarie Harbour, but there is no cut to actual stocking levels in the harbour, which remain at 14,000 tonnes – the level of production that has contributed to the environmental crisis in the harbour.[13]

ASC's positon on Tassal's operations in Macquarie Harbour

Despite the evidence presented above of increasing environmental harm in Macquarie harbour since 2013, Tassal's Macquarie harbour farms received ASC accreditation in June 2014 (Gordon and Middle Harbour leases) and November 2015 (Franklin lease). Tassal then retained its accreditation through two subsequent surveillance visits by ASC auditors, completed in August 2015 and May 2016.

By this time there was ample, publicly available evidence that conditions in Macquarie Harbour had deteriorated and Tassal was in breach of key ASC standards.

Environment Tasmania's review of the ASC audit reports demonstrates that auditors granted Tassal exemptions from meeting key ASC standards, disregarded evidence that Tassal was in breach of ASC standards and officially closed investigations of Tassal's non-conformity with ASC standards, even when evidence within the ASC's own documents demonstrated that Tassal remained in breach of ASC Standards.

'Variance granted'

[12] http://www.themercury.com.au/news/opinion/talking-point-swimming-upstream-on-fish-farms/news-story/a360e4f49cda6c6c70c8204934713ffa

[13] http://www.abc.net.au/news/2016-11-30/environmental-watchdog-tells-salmon-producers-to-reduce-biomass/8078382

The ASC has granted Tassal exemptions from meeting two ASC standards which provide some of the most important measures of intensive aquaculture's impact on the environment:

2.1 Benthic biodiversity and benthic effects

2.2 Water quality in and near the site of operation

Specifically, Tassal is granted an exemption from providing ASC auditors with water and sediment test results which demonstrate that their farms are meeting ASC requirements. The reasons given for this is that "Comprehensive regional monitoring programs are already established for the Tasmanian salmon farming industry to measure benthic biodiversity, benthic effects and water quality."[14]

However, Tasmania's monitoring requirements are less rigorous than ASC sampling requirements – relying solely on one 'visual' survey of the farm per year, rather than sediment and water sampling. And the Tasmanian Government's 'Macquarie Harbour Status Reports' demonstrate that at the time of ASC audits, Tassal was failing to comply with even these less rigorous requirements. These reports document that Tassal was in breach of regulations in July, October and November 2014 and May and September 2015. These breaches of regulations receive no mention by ASC auditors in the full assessment for two of three Tassal leases in Macquarie Harbour.

Breaches undocumented and prematurely closed

While breaches are not recognised in the full assessment of two of three Tassal leases (Gordon and Middle harbour), they are noted in the 2015 assessment of Tassal's third and largest lease – the Franklin lease. Breaches of ASC standards include:

- Failure to measure and report on weekly average oxygen levels prior to the audit;
- Reporting on oxygen levels during the audit at 5m depth but not 10m or 15 m depth;
- Breach of minimum oxygen levels even with limited measures of 5m depth during the audit period;
- Breach of state regulations relating to a requirement for no visual impacts at the lease site;
- The presence of numerous dorvilleids at compliance points – a sign of the locations failure to process nutrient loads;
- The presence of bacteria mats at compliance points.

By 2015 there was ample evidence, based on publicly available government data, of a systemic breakdown in farming systems in Macquarie Harbour. This evidence was ignored

[14] http://www.asc-aqua.org/upload/header/(22)_VR1_20140211_Tassal%20Operations_Macquarie%20Harbour%20-%20MF214%20Farm%20&%20MF219%20Farm_VARIANCE%20REQUEST-Closed.pdf

by auditors, who lists serious breaches of ASC standards as 'minor non-conformities' which did not disqualify Tassal from receiving ASC Certification.

In the first surveillance report for Tassal's Gordon and Middle Harbour leases, auditors now recognise breaches of standards for minimum oxygen levels. But even faced with evidence of a systemic issue with dissolved oxygen levels harbour wide, auditors classify Tassal's breach of minimum oxygen standards as 'minor'. The surveillance report also fails to mention breaches related to the abundance of dorvilleid – which place Tassal in breach of State Regulations.

In the second surveillance report for Gordon and Middle Harbour, which is combined with the first surveillance report for Franklin lease, auditors continue to describe serious standards breaches as minor. This contravenes ASC processes – which require minor non-conformities to be upgraded to major non-conformities if they have not been rectified within 12 months. Even more concerning, auditors officially close one 'minor' non-conformity relating to oxygen levels, even though evidence presented within their own report shows that Tassal is still in breach of the ASC standard:

""Weekly averages have dropped below 70% at 266 since 3/01/16, 219 since 10/01/16 & 214 since 17/01/16"; "recording oxygen saturations at 21-02-17 of 63% at lease 219 (up from 43.1% in December) and 58% at lease 266 (up from 33.8%)."[15]

The reason oxygen levels are set at 70 per cent is to prevent fish suffering from sub-lethal stresses – stresses of the kind the University of Melbourne's Professor Tim Dempster documented through his research at Huon Acquaculture leases over the summer of 2015-2016. In response to media coverage of this research, Tassal's CEO Mark Ryan publicly denied these fish health problems have occurred at Tassal leases, stating "Tassal fish health was excellent in the harbour"; "Third-party accreditation is underpinned by a rigorous audit process" and to meet the ASC standard "we have increased transparency through our reporting".[16] Mr Ryan's comments fail to reflect the evidence within the ASC's own audit reports for Tassal.

Conflict of interest: The financial incentive to certify

Both WWF and the ASC stand to lose significant amounts of money if Tassal's ASC Certification is withdrawn.

[15] Page 11. http://www.asc-aqua.org/upload/6_20161220_TassalOperations_MF214Farm_SURVEILLANCE2_PUBLIC%20-%20revised.pdf
[16] http://www.themercury.com.au/news/opinion/talking-point-swimming-upstream-on-fish-farms/news-story/a360e4f49cda6c6c70c8204934713ffa

Tassal >WWF

WWF is a founder of ASC and the only environment group on the board of ASC. Despite playing a key role in industry regulation, WWF Australia has had a contract with Tassal since 2012 which has resulted in Tassal paying WWF **up to $500,000 per annum.**[17] This contract has allowed Tassal exclusive use of the WWF logo on its products.

Tassal > ASC

The recent Four Corners investigation into Tassal disclosed that Tassal pays ASC auditors **$125,000 per annum**[18] to review its accreditation. There is a significant, additional payment made by ASC certified companies to the ASC which the Four Corners program and the ASC's accompanying statements did not disclose – the licence fee paid by all companies that use the ASC logo.

In 2017, any company using the ASC logo on packaging for consumers must pay royalties to the ASC of between 0.3 and 0.5% of sales per annum.[19] Based on these rates, Tassal could be paying the ASC royalties on its retail sales of **up to $789,690 per year.**[20]

"Such an outcome is inexplicable" - WWF's history of failed seafood certification

Environment Tasmania has access to an internal WWF review of its broader seafood certification scheme – MSC or Marine Stewardship Council certification. Produced in November 2016, WWF's own review of the success of MSC in regulating tuna fisheries in the Indian Ocean is damning. The report finds that **"the complete absence of Harvest Control Rules means that no Indian Ocean tuna fisheries should meet the MSC Fisheries Standard. However, multiple assessment teams, MSC technical oversight and MSC peer reviewers conclude otherwise. Such an outcome is inexplicable and it represents a very clear case of misapplication of the MSC Fisheries Standard."**[21]

Environment Tasmania's review of Tassal's ASC accreditation, which has revealed the granting of exemptions for key standards and disregard for clear evidence of non-compliance, indicates that ASC is going down the same fraught path as WWF's failed MSC certification scheme.

[17] http://www.abc.net.au/reslib/201610/r1631823_24948901.pdf
[18] http://www.abc.net.au/reslib/201610/r1631821_24948899.pdf
[19] http://www.asc-aqua.org/upload/ASC%20Costs%20Document%20January%202017.pdf
[20] http://www.tassal.com.au/wp-content/uploads/2016/08/FY2016-Results-Investor-Presentation.pdf
[21] 'WWF Retrospective in Indian Ocean Tuna Harvest Control Rules: A stakeholder's experience with application of the MSC Fisheries Standard' 9November 2016.

The rigour applied by auditors – SCS Global Consulting

The auditors Tassal has selected for its Macquarie Harbour ASC assessment and surveillance reports are called SCS Global. A closer review of the companies assessed as 'sustainable' by the corporate consulting firm raises further concerns regarding the rigour of sustainability processes applied to Tassal's Macquarie Harbour operations.

Below are some examples of operations which have received sustainability certification with SCS Global.

Addax Bioenergy

In 2014, Swiss Company Addax Bioenergy began exporting ethanol from a sugarcane plantation in Sierra Leone to the EU. In September 2013, ActionAid UK released a report which claimed that the project was impacting on the food security and land rights of local communities and lacked the free, prior and informed consent of the community before starting.[22] ActionAid's research found that land loss mitigation strategies had failed to provide many communities with sufficient food.

SCS Global audited Addax Bioenergy and certified the company as sustainable from March 2015 until March 2017.[23] The company ceased operations in Sierra Leone in June 2015 due to cost overrun and a drop in production output.

Cargill, Olam, Amyrtis

SCS Global continues to certify numerous biofuels producers as sustainable, in Indonesia, Brazil and South Africa, despite calls raised by independent non-government organisations including ActionAid, Greenpeace and the anti-poverty organisation Oxfam, for an end to the use of biofuels produced from food or energy crops.[24]

Biofuels companies operating in Indonesia and Brazil and certified as sustainable by SCS Global include Cargill, Olam and Amyrtis. Friends of the Earth has raised concerns about Amyrtis sugarcane operations in Brazil:

"What we do know is that sugarcane production in Brazil is far from sustainable and the recent increase in demand for biofuels is accelerating deforestation, soil degradation, water contamination, destruction of native vegetation, and increasing atmospheric pollution from sugar cane fires — particularly in the Cerrado.

[22] http://www.actionaid.org/nl/nederland/publications/broken-promises-impacts-addax-bioenergy-sierra-leone-hunger-and-livelihoods
[23] https://www.scsglobalservices.com/biofuel-bioproduct-and-sugarcane-certfications
[24] https://www.oxfam.org/en/research/hunger-grains . https://www.grain.org/article/entries/4653-land-grabbing-for-biofuels-must-stop. https://www.bloomberg.com/news/articles/2013-02-20/eu-should-phase-out-support-for-land-based-biofuels-lobbies-say

The Cerrado (a savannah) is home to nearly 160,000 species of plants and animals, many of which are endangered. According to a 2008 report by Maria Luisa Mendonça, nearly 22,000 square kilometers of savannah are cleared every year. Estimates claim that over half of the region has already been devastated, and at this rate it will be completely destroyed by the year 2030."[25]

Advanced Biochemical (Thailand) Co., Ltd

A subsidiary of Vinythai, Advanced Biochemical manufactures and sells Epichlorohydrin, a chemical substance mainly used in Epoxy Resin production. It operates a plant located at Map Ta Phut in Rayong, on the site of its parent company (Vinythai).[26]

In 2004 Greenpeace released a report on Vinythai's dumping of toxic chemicals into east canal and the Gulf of Thailand.[27] In October 2010 a report by Silpakorn University indicated that industrial chemicals from Map Ta Phut continued to pose serious health hazards to nearby villagers. The report was based on studies provided by plant operators after an Administrative Court ordered the suspension of 76 projects at Map Ta Phut. The Silpakorn University report found 21 of the products produced at Map Ta Phut use carcinogenic substances.[28]

Local villager opposition against water and air pollution from Map Ta Phut industrial estate is organised through the Eastern People's Network and the Council of Work and Environment Related Patients Network. A study by the National Cancer Institute in 2003 found the incidence of respiratory disease and lung cancer in the Map Ta Phut region was significantly higher than in other areas of Thailand.[29] In August 2016 a report by Sri-racha Kasetsart University found that pollution from Map Ta Phut continues to cause death, injury and health problems for local residents.[30]

Advanced Biochemical Thailand was incorporated in 2008 and has operated as a subsidiary of Vinythai since 2010.[31] SCS Global awarded the company sustainability certification in September 2015.[32]

PNA Skipjack and Yellowfin and Tri Marine Central and Western Pacific Skipjack and Yellowfin Tuna

[25] https://www.cbd.int/doc/emerging-issues/foe-synthetic-biology-for-biofuels-2011-013-en.pdf
https://www.foe.co.uk/sites/default/files/downloads/sugar_cane_and_land_use_ch.pdf
[26] http://www.bloomberg.com/research/stocks/private/snapshot.asp?privcapId=67302666
[27] http://www.greenpeace.org/seasia/th/Global/seasia/report/2008/5/waste-water-sediment-analysis.pdf
[28] http://www.bangkokpost.com/learning/advanced/200791/chemical-health-hazards-at-map-ta-phut
[29] http://www.nytimes.com/2009/12/19/world/asia/19thai.html
[30] https://www.tci-thaijo.org/index.php/aer/article/download/69142/56253
[31] http://www.bloomberg.com/research/stocks/private/snapshot.asp?privcapId=67302666
[32] https://www.scsglobalservices.com/biofuel-bioproduct-and-sugarcane-certfications

SCS Global has also certified a number of the tuna fisheries which WWF's internal review suggests should not have received MSC Certification – a Certification system which WWF founded and sits on the board of.

Both PNA Skipjack and Yellowfin and Tri Marine Central and Western Pacific Skipjack and Yellowfin Tuna have MSC Certification, but have failed to introduce Harvest Control Rules. [33]

Clear solutions

Environment Tasmania is supportive of third party industry certification schemes, where they are rigorous and independent. Below are a number of possible solutions to address the current failings in ASC certification processes.

- Suspend all ASC certifications in Macquarie Harbour pending a full, independent and transparent investigation into the ecological crisis in the harbour, the practices of ASC certified companies and the inaccuracies in assessment and surveillance reports which have allowed Tassal to retain certification while failing to conform with ASC standards.
- Grant no exemptions to ASC standards. In the case of a genuine failure of global standards to accommodate local circumstances, regional variances should be developed which are equally rigorous. Assessment should not proceed until these standards are approved by a technical group which includes a representative from at least one not-for-profit, local environment group that does not accept money from the companies being assessed.
- The Board of ASC should include representatives from at least three not-for-profit environment groups that do not accept money from aquaculture companies being assessed.
- ASC audit teams should include representatives from at least one local, not-for-profit environment group that does not accept money from the aquaculture companies being assessed.
- ASC audit teams should be paid by the ASC, not by the companies undergoing assessment.
- ASC audit teams should be required to assess all published and publicly available evidence on the operations of the company being assessed, not just data and information provided by the company.
- Objections processes should be improved and require evidence that auditors have met with stakeholders lodging objections and independently reviewed the evidence presented to support the objection.

[33] https://fisheries.msc.org/en/fisheries/pna-western-and-central-pacific-skipjack-and-yellowfin-unassociated-non-fad-set-tuna-purse-seine/@@view. https://fisheries.msc.org/en/fisheries/tri-marine-western-and-central-pacific-skipjack-and-yellowfin-tuna/@@view. https://www.scsglobalservices.com/sustainable-seafood-certificates.