

GAA Response to Comments Received for the Feed Mill Standard, Issue 3.0

The 60-day Public Comment Period for the Feed Mill Standard occurred on November 21st, 2019 – January 28th, 2020.

The Global Aquaculture Alliance (GAA) would like to thank the organizations and individuals who took the time to review and submit comments regarding the Feed Mill Standard Issue 3.0. GAA values the feedback received and has provided a response to each comment in the following document. Please note that responses are provided to only the public comments submitted by the January 28th, 2020 deadline via the BAP website.

General Comments

Comment:

Audit Duration Calculator

Given the variance in the size of certified facilities, the absence of an audit duration calculator means that not all sites are audited equally. Given that the set audit duration for the standard is 1.5 days regardless of the size of the facility, it means large facilities are not getting audited the same as smaller facilities. Furthermore, the number of clauses at 174 means that 1.5 days is wholly insufficient time to conduct the audit adequately. These are significant risks for the program.

It is suggested that a basic audit duration calculator is implemented using two criteria for starters;

1. Sq. ft. or size of the facility
2. Number of staff on site

These two criteria will at least ensure that sufficient time is allocated proportionally to see the full site and allowing enough time for the social criteria which has 35% of the clause numbers for the audit.

Response from BAP:

These comments have been passed to the Program Integrity team and will influence the process of audit duration calculation.

Comment:

Thank you for allowing me to participate in the public comments on the BAP Feed Mill Standard. It is a very comprehensive and well-written document that will be useful to facilities making aquaculture feed.

I have just one comment regarding the Food Safety Modernization Act (FSMA) regulations for US manufacturers of animal food. The BAP Standard, though it covers many requirements of FSMA, does not specify that US feed mills must be registered with FDA and that they will be inspected for Current Good Manufacturing Practices and Preventive Controls compliance by FDA inspectors (or their designees within the states). The regulations are in 21 CFR Part 507. For feed mills outside the US that sell to US

customers, FSMA requires compliance with the Foreign Supplier Verification Program, which is similar in scope to the FSMA requirements for US feed mills. Both programs require a written Food Safety Plan that includes CGMP documentation and a hazard analysis (as specified by FDA) with appropriate preventive controls included where necessary. Although HACCP requirements are similar, they will not be sufficient for the FDA inspections.

You have probably already considered the influence of FSMA on these animal feed manufacturers, but I would worry that, if it is not mentioned, some feed manufacturers will think that the requirements of BAP certification will cover them for FSMA compliance. Although the BAP Standard is comprehensive and, in many cases, more stringent than the FSMA regulations, its requirements may not fulfill the FSMA compliance requirements under 21 CFR Part 507.

Response from BAP:

New wording inserted into the Implementation guidance of Section 2:

“Feed mills shall comply with all relevant laws in their jurisdiction (see Section 1 of this standard) and cannot substitute compliance with BAP standards for compliance with national laws or regulations.”

And Clause 1.4 states:

1.4: Current documents shall be available to prove that the facility is aware of, keeps up-to-date, and complies with, all relevant legislation of both the country they produce feed in, the countries they export to, and source countries if applicable. This includes all feed safety regulations.

Comment:

I propose that we as scheme holders work together strategically, based on each other's core business and strengths, with respect for each other and with mutual benefits. We both operate internationally, so we can operate complementary if we would collaborate in strategic way.

I suppose that your core business and expertise is aqua farming, with a good network and involvement of the aqua culture business.

While GMP+ International's core business is feed safety & responsibility (sustainability) management. We partnership of stakeholder groups in the whole feed chain internationally. Our scheme has a feed safety assurance module and a feed responsibility assurance module.

If we align our schemes, we can provide you the certification of aqua feed producers. That will be fully linked to the supply chain of feed ingredients, also covered by our scheme. Chapter 6 and 7 of your Feed Mill Standard Issue 3.0 can be fully covered by the GMP+ Feed Safety Assurance module. The other requirements of that standard can be provided in a specific add-on in our GMP+ Feed Responsibility Assurance module. That add-on will be visible as a BAP related add on. It will be beneficial for feed mills producing pig and poultry feed, etc. besides aqua feed; it will provide a one-stop-shop – multiple certification solution.

I invite you to discuss with us about the challenge and benefits of such a strategic collaboration.

Response from BAP:

BAP will continue discussions with existing standard setters for feed mills and feed ingredients with a view to possible alignment and recognition.

Comment:

- I appreciate that some clauses from previous versions were clarified.
- There are a few typographical errors in the document.

Response from BAP:

Several typos now corrected.

Comment:

1. While the compliance with local regulations should be a pre-requisite, we propose to create a specific section at the beginning of the document, where all references to local regulation could be collected (e.g. minimum wage shall comply with local regulation). Reference is made towards the compliance with laws and regulations in multiple places throughout the document. We believe, this would improve document readability and increase the focus on local legislation pre-requisite. It would also become obvious that further requirements of the standard come on top of this pre-required compliance with regulations.
2. It might be appropriate to have a list of acronyms in the document (and avoiding use of acronyms which could create confusion)

A chapter with definitions, which would either reduce the text in certain case, but also ensure consistency in the wording (e.g. lot vs batch). Definitions in the document should be very close to existing CODEX definitions (i.e. only adapted to the context, if needed).

Response from BAP:

Adopting the suggestion 1., would clarify that the standard builds upon existing legal requirements but it would also be a big upheaval from the existing layout of the whole suite of BAP standards. For this reason, it's not an attractive proposition.

Regarding suggestion 2., BAP standards do not usually include glossaries.

The use of acronyms has been minimized, and they are defined at least once and at first usage. IFFO RS is not spelled out but this organization is now referred to by its new name – MarinTrust.

Comment:

Stronger focus on social welfare and worker safety, however they permit the legal age as low as 14 if that is the age permitted in the country of audit.

Response from BAP:

This is consistent with ILO Conventions which set the minimum at 15 and exceptionally at 14. It is also consistent with SSCI, the benchmark for social compliance programmes launched by the Consumer Goods Forum:

SSCI 4.01: The standard shall require compliance with the minimum age for work as defined by applicable national legal requirements or the age of completion of compulsory education, whichever is higher. The minimum age for work shall not be less than 15 years. If however, local minimum age law is set at 14 years of age in accordance with ILO Convention 138, this lower age may apply.

General Comments Page 2

Comment:

Better to steer away from stating "guidelines".

Response from BAP:

Adopted

Comment:

'terrestrial' needs to be deleted. Because, BAP feed mill standards wouldn't apply to terrestrial animals.

Response from BAP:

But they could be applied to pet food makers

Comment:

2nd paragraph would be better rephrased thus: "They are designed to assist program applicants in performing self-assessments of the environmental and social impacts, and food safety controls of their facilities. **BAP Standards lead to certification of compliance after verification of the applicant's facilities by BAP approved third-party certification bodies.** For further information, please refer to the additional resources listed"

Response from BAP:

Adopted.

General Comments Page 3

Comment:

Instead of "all points" we should say "all requirements".

Response from BAP:

Adopted.

Comment:

As with other BAP standard audits, the assessment against the BAP feed mill standard will consist of these elements in accordance with ISO19011.

- opening meeting
- site assessment
- collection of any necessary samples
- staff interviews
- review of documentation and records
- closing meeting
- provision of non-conformance summary report to the facility figure

Response from BAP:

Adopted.

Comment:

Must include the certification process flow. The facilities are always clueless as to what is involved in the BAP certification process. Could use the same for all BAP standards including this one.

Response from BAP:

A process flow diagram has been inserted

General Comments NC Table

Comment:

Any non-conformity issued during the assessment will be recorded by the auditor as either:

NC Rating	Definition	Required Action
Critical	Where there is a critical failure to comply with a food safety and/or legal issue or a risk to the integrity of the scheme.	The auditor will immediately inform the Certification Body, who will inform the GAA/BAP office. Immediate temporary suspension may ensue pending clarifications (for certified facilities).
Major	Where there is a substantial failure to meet the requirements and/or intent of any clause in the Standard but there is no food safety risk and/or legal issue or immediate risk to the Integrity of the scheme. (Generally, policy)	Objective evidence verifying the proper implementation of corrective action and closing of non-conformities must be submitted to the Certification Body in accordance with GAA/BAP certification management rules.
Minor	Where absolute compliance with requirements and/or the intent of any clause in the Standard has not been demonstrated. The matter does not rise to the level of Major or Critical and tends to be lower risk issues or isolated instances rather than patterns. Not indicative of an overall breakdown in compliance and systems.	Objective evidence verifying the proper implementation of corrective actions and closure of non-conformities must be submitted to the Certification Body in accordance with GAA/BAP certification management rules.

Verification of the implementation of corrective actions shall be submitted to the certification body within 35 calendar days of the audit date.

Proposed Change:

For consistency with other BAP standards

Response from BAP:

Adopted.

Section 1 – 1st Sentence

Comment:

Because of the way BAP standards are structured, should not use 'shall' in places other than the clauses. Because the text in here is not auditable. Also, this information explaining the overall intent of the section and the reason and implementation do not match with the auditable clauses. For e.g. there is no clause for the product exports and documentation related to that asked within the clauses.

Response from BAP:

This format, with an opening statement of intent for each section, is considered helpful and is used throughout BAP standards. However, Clause 1.4 has been inserted to be consistent with the Seafood Processing Standard and cover exports:

1.4: The facility shall have current, valid documents to prove that it is aware of, keeps up-to-date, and complies with, all relevant legislation of both the country they produce feed in, the countries they export to, and source countries if applicable. This includes all feed safety regulations.

Section 1 – 2nd Paragraph

Comment:

Refers to environmental regulations and also meeting established standards for product safety - local, national and export markets. However, there is no audit-able clause in this section. Reasons for standard cannot be expected to be audited because they are outside the purview of the auditable clauses within the standard.

Response from BAP:

However, the auditable clauses do refer to operating licenses, which may encompass environmental regulations. And note, new Clause 1.4:

1.4: The facility shall have current, valid documents to prove that it is aware of, keeps up-to-date, and complies with, all relevant legislation of both the country they produce feed in, the countries they export to, and source countries if applicable. This includes all feed safety regulations.

Section 1 – Bullets

Comment: so many aspects are here but they are not covered within the standards. So many get overlooked as they are not within the auditable clauses of the standard.

We speak of proof of waivers to be available but do not have an audit-able clause.

Response from BAP:

However, the auditable clauses do refer to operating licenses, which may encompass the items bulleted. The added detail in the Implementation guidance may assist applicants.

Section 1 – Page 4

Comment:

The list under 'Implementation' might also mention that laws can call for feed safety. If food safety is to be controlled, this is an important point

Proposed Change:

Mention e.g. implementation of HACCP plan, traceability and recall procedure.

Response from BAP:

Reference to feed safety now included in clause 1.4:

1.4: The facility shall have current, valid documents to prove that it is aware of, keeps up-to-date, and complies with, all relevant legislation of both the country they produce feed in, the countries they export to, and source countries if applicable. This includes all feed safety regulations.

Clause 1.1

Comment: Would be better to state - 1.1 The facility shall have current valid documents to prove legal land and water use.

Response from BAP:

Current wording is consistent with the Seafood Processing Standard

Clause 1.2

Comment:

Would be better to state - 1.2 The facility shall have current valid documents to prove necessary business, construction, operation licenses, environmental licenses, clearances to use medicated ingredients, air quality approvals from local, regional, and/or national governmental agencies. The feed mill shall have conducted environmental impact and/or strategic environmental assessments and have the documented results on file.

Response from BAP:

Current wording is consistent with the Seafood Processing Standard

Clause 1.3

Comment:

As 1.3 is covered under 1.2, propose new clause at 1.3

1.3 The facility shall meet established standards for product safety, complying with local and national regulations and the requirements of export markets.

Response from BAP:

New clause 1.3, copied from the Seafood Processing Standard:

1.3: The facility shall have current, valid documents to prove compliance with applicable regulations for construction and operation.

Section 2 – Page 4

Comment:

“Feed mills shall also promote improvements in their supply chains...”

Proposed Change:

Same ‘rule’ should apply to all ingredients. Not necessary to differentiate between ingredients.

Response from BAP:

Adopted. Wording now modified to reflect consistent aspirations for all ingredients:

“Feed mills shall also promote improvements in their supply chains (See Section 4: Sustainability of Key Inputs) by actively favoring ingredients from sources with clear policies for social and labor standards and independently assessed sources, and shall obtain ingredients from socially certified sources as they become available.”

Section 2 – Page 8

Comment:

Worker Health and Safety

Proposed Change:

Recommend consult with experts in e.g. Cargill on this section to ensure the guidance is aligned with today’s best possible safety practices in feed mills. A lot of work has been done in this area.

Response from BAP:

Input has been received in this regard.

Clause 2.2

Comment:

The legal minimum wage, employment contract or collective bargaining agreement by its nature should already consider basic expenses and some discretionary funds for use by workers. Else, how do we define *basic* expenses? In the same train of thought, what does *some* discretionary funds mean?

Proposed Change:

Delete “Regular wages and compensation shall cover the workers’ basic expenses and allow for some discretionary funds for use by workers and their families.”

Response from BAP:

The context here is that there is growing marketplace expectation for social standards to require ‘living wages’ rather than ‘minimum wages’. Clause 3.2 is not easy to interpret with precision but it signals that standards are moving towards requiring wages that meet more than minimum/basic needs. It does not refer to ‘living wage’ given the difficulty of defining ‘living wage’.

Clause 2.2

Comment:

“The facility shall ensure that workers are paid at least the legal minimum wage..”

Proposed Change:

Clarify: Where it exists

Response from BAP:

The clause also states:

“or the wage rate established by an employment contract or collective bargaining agreement, whichever is higher”

This covers situations where there is no legal minimum wage.

Clause 2.7

Comment:

The facility shall maintain all relevant documents that verify piece workers (those paid a fixed “piece rate” for each unit produced or action performed regardless of time) are paid in compliance with local

or national law, including regulations regarding equivalence to or exceeding minimum requirements for wages, hours, overtime and holiday pay.

Proposed Change:

Needs to be modified as indicated

Response from BAP:

Adopted

Clause 2.9

Comment:

Working Hours

Proposed Change:

For all this part, reference to ILO convention would be appropriate.

Response from BAP:

References to ILO conventions 138 and 29 are included regarding minimum age and forced labour. The existing wording is consistent with the Seafood Processing standard and ILO.

Clause 2.4

Comment:

2.4 – The facility shall not make deductions from wages that are unauthorized or not provided for by national law. Facilities shall not make deductions from wages as part of a disciplinary process. **Neither shall the facility make deductions including but not limited to provision of work tools, transportation, and/or others that are not specified in the written contract between facility and workers**

Proposed Change:

Needs to be expanded for completeness and for consistency with Seafood Processing Standard

Response from BAP:

Adopted (3.5)

Clause 2.10

Comment:

2.10 – Overtime shall not exceed 12 hours per week except as permitted by national law and **agreed between facility and workers in a voluntary contract.**

Proposed Change:

This wording is more precise

Response from BAP:

Adopted (3.11)

Clause 2.11, 2.16, 2.42

Comment:

Compliance with National Laws..

Proposed Change:

What happens in cases where National Laws do not exist? Require clarification in employment contracts?

Response from BAP:

For Clause 2.11,(now 3.10) if there is no national law, Clause 2.12 (now 3.13) states: *Facilities shall respect all workers right to a rest day after six consecutive days worked.*

For Clause 2.16 (now 3.4), in the absence of national laws, the employment contract or the collective bargaining contract would prevail (Clause 3.35)

Clause 2.12

General Comments

Comment:

La instalación no rescindirá el contrato de un empleado por negarse a trabajar horas extras o desplegar cualquier otro perjuicio por incumplimiento.

Proposed Change:

Se puede unificar con 2.17 ya que tienen sinergias.

Response from BAP:

Adopted.

Clause 2.12

General Comments

Comment:

You can unify with the item 2.17

Proposed Change:

The facility shall not terminate an employee's contract for refusal to work overtime or deploy any other detriment for noncompliance. All work, including overtime, shall be voluntary, and shall not be under threat of any penalty or sanctions.

Response from BAP:

Adopted.

Clause 2.13

Comment:

Facilities shall maintain records that verify compliance with working hour laws, overtime, meal and rest breaks and termination for all workers including but not limited to piece rate workers, contractors/subcontractors, hourly, salaried and temporary workers.

Proposed Change:

Suggested rewording for clarity

Response from BAP:

Adopted.

Clause 2.14

Comment:

The facility shall not engage in any form of forced or indentured labor including prison labor. This includes human trafficking, the confiscation or holding of original identity papers and other valuable possessions, hampering or preventing the renewal of travel or identification documents, and other means of coercion intended to force anyone to work.

Proposed Change:

This clause needs to be explicit about prison labour

Response from BAP:

Adopted.

Clause 2.15

Comment:

Bonded labor shall be prohibited. The facility shall not require the payment of deposits, bonds or other financial or collateral guarantees that may result in debt bondage. This includes recruitment fees, fines,

and deductions from wages, and withholding of pay that are not part of a written contractual agreement with the employee.

Proposed Change:

Suggest strengthening

Response from BAP:

Adopted.

Clause 2.16

Proposed Change:

Move clause to follow sequence in Seafood Processing Std

Response from BAP:

Adopted.

Clause 2.17

Comment:

Delete

Response from BAP:

Adopted.

Clause 2.17

Comment:

Todo el trabajo, incluidas las horas extraordinarias, será voluntario y no estará amenazado por sanciones o sanciones.

Proposed Change:

Se puede unificar con 2.12 ya que tienen sinergias.

Response from BAP:

Adopted.

Clause 2.18

Comment:

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

"Facility shall not otherwise unreasonably restrict workers' freedom of movement including but not limited to surveillance during rest or non-work hours, during transportation, in dormitories provided by the facility".

Proposed Change:

'Freedom of movement' needs to be expanded

Response from BAP:

Adopted.

Clause 2.19

Comment:

The facility shall have the information regarding hot-lines, competent authorities, and other resources for victims of labor rights abuse displayed prominently for easy access to workers.

Proposed Change:

Needs rewording for consistency

Response from BAP:

Adopted.

Clause 2.20

Comment:

The facility shall not engage in or support the use of child labor. The facility shall comply with local child labor laws regarding minimum working age, or the age of compulsory education, or, the ILO Minimum Age Convention 138, whichever is higher. While ILO Minimum Age Convention 138 states the minimum age shall be 15, local **or national** law of minimum age of 14 may apply if it is in accordance with developing nation's country exceptions under this convention. **The facility shall collect, verify and retain age related records of workers to confirm that the age requirements are met.**

Proposed Change:

Suggested additions for clarity and rigor

Response from BAP:

Adopted.

Clause 2.21 & 2.24

Comment:

The employment of young workers (above the minimum age but under 18 years old) shall comply with local **or national** laws, including required access to compulsory education.

Workers shall have a legal right to work in the country they are working in. Work performed and terms of employment shall comply with local, **national** or international labor standards, whichever is stricter. Records shall be collected, verified, and retained to document right to work documents.

Proposed Change:

Need to specify 'national' too

Response from BAP:

Adopted.

Clause 2.25

Comment:

All labor recruiting agencies or employment services used by the facility must be licensed to operate by the local or national government as labor providers. Workers shall not be subject to recruitment practices that **utilize** threats, penalties, coercions, physical force, or fraud.

The facility shall document the agencies used to recruit, hire, and/or employ workers, in addition to any known fees paid by or debts accrued by workers in order to secure employment.

Proposed Change:

move after 2.26 and 2.27 and, for consistency with Seafood Processing Standard, insert a requirement to log the agencies, to meet marketplace expectations for social standards

Response from BAP:

Adopted.

Clause 2.26

Comment:

Where contracted/subcontracted or temporary workers are hired through a labor **recruiting agency** or employment service, the facility shall ensure that **these services** provide **all the information cited at clause 2.27** prior to and during hire, in appropriate languages, to ensure workers are aware of their rights and conditions of employment as described above.

Proposed Change:

For clarity, and move after 2.27, renumber.

Response from BAP:

Adopted.

Clause 2.27

Comment:

The facility shall provide to all workers, prior to hire and during employment, with written and understandable information regarding the terms and conditions of employment, worker's rights, benefits, compensation, expected working hours, details of wages for each pay period each time they are paid, and facility policies regarding disciplinary actions, grievance procedures, any authorized deductions from pay, physical work, environment and housing, and similar. This information **shall** be provided in **the appropriate** language of the employees. This requirement shall apply to all workers regardless of status, including but not limited to hourly, salary, piece rate, temporary and seasonal workers.

Proposed Change:

Suggested change for clarity

Response from BAP:

Adopted.

Clause 2.27, 2.31, 2.49

Comment:

"...prevalent language of a majority of employees."

Proposed Change:

Seems odd. Information has to be accessible to ALL employees, so available in native language?

Response from BAP:

Changed to 'appropriate language'

Clause 2.28

Comment:

The facility shall provide for equal opportunity with respect to recruitment, **hiring, terms of employment**, compensation, access to training, promotion, termination and retirement.

Proposed Change:

Edit for consistency with Seafood Processing standard

Response from BAP:

Adopted.

Clause 2.31

Comment:

The facility shall have a written disciplinary procedure made available in **the appropriate** language of **the** workers. Records shall be maintained of all disciplinary actions.

Proposed Change:

Modify for clarity

Response from BAP:

Adopted.

Clause 2.32

Comment:

La instalación no deberá despedir a las empleadas por embarazo, someter a las trabajadoras a pruebas de embarazo o virginidad, forzar el uso de anticonceptivos o reducir los salarios después de la licencia de maternidad.

Proposed Change:

Debería de quedar sólo: "La instalación no deberá despedir a las empleadas por embarazo, forzar el uso de anticonceptivos o reducir los salarios durante y/o después del periodo de maternidad, ya que el tema de las pruebas de embarazo o virginidad no es común en nuestro medio.

Response from BAP:

See below.

Clause 2.32

Comment:

Modify the context, in our country is not common that culture.

Proposed Change:

The facility shall not terminate employees for pregnancy, force the use of contraception, or reduce wages after maternity leave.

Response from BAP:

Although subjecting workers to pregnancy or virginity testing is rare, the standard still needs to explicitly address this type of abuse

Clause 2.33

Comment:

The facility **shall** have in place an established complaints and remediation system to handle cases and allegations of sexual abuse/harassment, bullying or discriminatory practices. **This shall, at a minimum, include a confidential reporting mechanism, information on any hot-lines or other outside services available and the possibility of initiating an independent assessment/arbitration.**

Proposed Change:

Needs expanding. 'Worker voice' is a marketplace expectation of social standards.

Response from BAP:

Adopted.

Clause 2.34

Comment:

Facilities shall respect the rights of workers to associate, organize, and bargain collectively **(or refrain from doing so)** without **the need of** prior authorization from management. Facilities shall not interfere with, restrict, or prevent such activities and shall not discriminate against or retaliate against workers exercising their right to representation in accordance with international labor standards.

Proposed Change:

Needs to be consistent with the Seafood Processing Standard

Response from BAP:

Adopted.

Clause 2.35

Comment:

Where the right to freedom of association and collective bargaining is prohibited or restricted under local law, the facility shall not prevent alternative means to **facilitate** worker representation and negotiation. (For example, the election of one or more employees by the workers to represent them to management).

Proposed Change:

typo

Response from BAP:

Adopted.

Clause 2.37

Comment:

The facility shall have a written worker grievance process/procedure and make it available to all workers, that allows for the anonymous reporting of grievances to management without fear of retaliation.

Proposed Change:

Reword for consistency

Response from BAP:

Adopted.

Clause 2.38

Comment:

The facility shall provide safe, healthy and clean conditions in all work, rest, dining, and, if applicable, housing areas, and shall establish and follow a clear set of procedures that ensures occupational health and safety. This includes providing access to potable water, clean toilet facilities, and, if applicable, sanitary kitchen and storage areas.

Proposed Change:

Needs to be consistent with the Seafood Processing Standard

Response from BAP:

Adopted.

Clause 2.38

Comment:

The facility shall provide safe, healthy and clean conditions in all work, rest, dining, and, where applicable, housing areas. When housing areas are off-site, it should be clear in the standard that these too are in scope.

Proposed Change:

The facility shall provide safe, healthy and clean conditions in all work, rest, dining, and, where applicable, housing areas both on-site and off-site.

Response from BAP:

Adopted.

Clause 2.39

Comment:

If provided or mandated by the facility or employment agency/labor broker, employee housing shall meet local and/or national standards **including but not limited to safe, watertight structures, adequate space, heating/ventilation/cooling, pest control, sink, shower and toilet provisions.**

Proposed Change:

Reword for consistency and clarity

Response from BAP:

Adopted.

Clause 2.41

Comment:

If meals are provided, they shall be wholesome and commensurate with local eating customs.

Proposed Change:

Add 'safe'

Response from BAP:

Adopted.

Section 2 – Suggested New Clause

Comment:

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

Proposed Change:

Suggested new clause

Response from BAP:

Adopted.

Clause 2.43

Comment:

The facility shall appoint a management person responsible for ensuring worker health, safety and training.

This should also cover subcontractors and visitors.

Proposed Change:

The facility shall appoint a management person responsible for ensuring worker, **subcontractor and visitor health**, safety and training

Response from BAP:

Not Adopted.

Clause 2.44, 2.45, 2.46, 2.48

Comment:

Move after 2.53

Proposed Change:

To be consistent with seafood processing plant standard

Response from BAP:

Adopted.

Clause 2.44

Comment:

An emergency response plan shall be prepared for serious illnesses or accidents, including measures to be taken in case of fire **and other eventualities**.

Response from BAP:

Adopted.

Clause 2.45

Comment:

Select workers shall be made familiar with details in emergency response plans and trained in the first aid of electrical shock, profuse bleeding, and other possible medical emergencies. **A list of the trained workers shall be kept.**

Proposed Change:

Consistency with seafood processing plant standard

Response from BAP:

Adopted.

Clause 2.46

Comment:

At least one of the workers described in 2.45 shall be present **while the facility is in operation or maintenance**

Proposed Change:

Consistency with seafood processing plant standard

Response from BAP:

Adopted.

Clause 2.46

Comment:

“...shall be present at the facility at all times during production”

Proposed Change:

Clarify: “...during production and maintenance”

Response from BAP:

Adopted.

Clause 2.48

Comment:

The **facility** shall limit worker exposure to sound in excess of 85 dB to less than eight hours a day or apply a stricter national standard.

Proposed Change:

For consistency

Response from BAP:

Adopted.

Comment:

The facility shall ensure proper measures for fire protection and prevention in all work, rest, dining, and where applicable, housing areas. This includes but is not limited to: adequate numbers of functioning fire extinguishers **as per legal requirement; sufficient number of emergency exits (including provision of appropriately designed emergency stairwells on multi-story buildings to support evacuation for personnel), provision of fire hydrant, and evacuation routes** that are clearly marked, properly lit and kept clear and unlocked while employees are present; proper training and enforcement for handling of flammable liquids and chemicals; and procedures to prevent fires during such activities as welding.

Proposed Change:

Needs to be stronger

Response from BAP:

Adopted.

Clause 2.53

Comment:

In a big factory there are a lot of critical emergencies that not necessary includes evacuation as an accident or oil spill: Is important each factory consider principal emergency risks. Doing in all floors could be obligate to stop production some journies per year for accomplish.

Proposed Change:

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

Response from BAP:

No change made

Clause 2.53

Comment:

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

Proposed Change:

Edit

Response from BAP:

Adopted

Clause 2.56

Comment:

Protective gear and equipment in good working order shall be provided, **free of charge**, to employees (e.g., eye protection for welding, gloves for shop work, boots for wet areas, ear protection near hammer mills and pulverizers). Auditor shall verify deployment.

Proposed Change:

Specify free of charge

Response from BAP:

Adopted.

Clause 2.56

Comment:

The clause shall be specific also with protective gear for those employees that handle drugs (antibiotics, hormones)

Proposed Change:

My proposal is that a new clause (2.57) shall address specifically the protective gear for those who handles antibiotics and/or hormones at the feed plant

Response from BAP:

Adopted. 2.56 (now 3.57) expanded to include 'gloves, masks and aprons for handling antibiotics.'

Clause 2.56

Comment:

There must also be a record of ensuring that defective/damaged PPE is replaced

Proposed Change:

Protective gear and equipment in good working order shall be provided for employees (e.g., eye protection for welding, gloves for shop work, boots for wet areas, ear protection near hammer mills and pulverizers). Auditor shall verify deployment **and check records that PPE shelf life recommendation is adhered to and any defective/damaged PPE is replaced.**

Response from BAP:

There is a requirement for respecting expiry dates for first aid kits in a new clause. But, for the PPE envisaged here, requiring 'good working order' is considered adequate.

Clause 2.57

Comment:

The facility shall provide adequate medical care for employees, including access to or communication with medical authorities in case of emergencies or accidents. **Records of medical care provided shall be available**

Proposed Change:

Modify for consistency with SPS and add record keeping

Response from BAP:

Adopted.

Clause 2.58

Comment:

First aid kits shall be readily available to employees close to work and rest areas. First aid kits shall be sealed to prevent contamination from the working environment.

Proposed Change:

Modify for consistency with SPS

Response from BAP:

Adopted.

Clause 2.59

Comment:

delete

Proposed Change:

Already covered

Response from BAP:

deleted

Clause 2.59

Comment:

The facility shall maintain a list of first aid items kept on hand and, where appropriate, their expiration date.

Proposed Change:

Insert for consistency with SPS

Response from BAP:

Adopted

Clause 2.60

Comment:

The clause shall be specific for training the employees that handle drugs (antibiotics, hormones)

Proposed Change:

My proposal is that a new clause (2.62) shall address specifically the training and reviewed pre-determined frequency for those employees that handles antibiotics and/or hormones at the feed plant

Response from BAP:

Existing clause 2.60 (now 3.61) has been modified to include training for workers that handle antibiotics

Clause 2.60

Comment:

The facility shall have a **documented** training program for workers and maintenance personnel that operate or work on machinery and/or other dangerous equipment. Such training shall include but is not limited to boiler operators, welders, forklift drivers and those that operate or work on potentially dangerous machinery. Where local law requires workers to be licensed to operate or maintain such items, proof of licensing shall be maintained.

Proposed Change:

Edit for consistency with SPS

Response from BAP:

Adopted.

Clause 2.61

Comment:

This item is similar to a Global Gap CFM standard requirement but is difficult to accomplish because some staff is not allocated in the facility, for example, administrative staff as Commercial, finance, secretaries. Additionally sometimes this people is not related directly with the production. This requirement could be an obstacle for doing important annually refresh to the people that are related directly with the product as wages, supervisors and administrative staff allocated in the facilities.

Proposed Change:

The applicant shall provide training in general health, personal hygiene and safety, first aid and contamination risks to all employees allocated in the facilities. The applicant shall also provide refresher training to all wages and staff of the facilities on these subjects at least annually.

Response from BAP:

This clause has been reworded to make it clear that the requirement 2.61 (now 3.62) relates to the facility, i.e. feed mill, being audited. Staff training at remote administrative offices is not in scope

Clause 2.61

Comment:

The facility shall maintain a training program that orients new employees in general health and safety. The facility shall also provide refresher training to all employees on these subjects at least annually.

Proposed Change:

For consistency with SPS

Response from BAP:

Adopted.

Section 3 - General Comment

Comment:

When calculating FIFO should identify that this can be done by mass balance for the feed mill as allowed with present standards.

Allowable certification for soya sustainability should include organic certification.

Response from BAP:

Both Adopted.

Section 3 - General Comment

Comment:

How does BAP calculate and/or weigh the various outcome of the environmental parameters to be audited to provide a ranking/rating to the feedmill?

Proposed Change:

We (public) should be invited to comment on that equation and weighting factor which eventually leads to a BAP certification.

For example:

Is IFFORS or FIP fishery treated in the same manner as MSC certified fishery ?

Is a charcoal cleaned fish oil treated the same as a unclean fish oil or charcoal deoderised fish oil ?

Is natural marine algal oil produced sustainably rated the same as MSC fishery or higher because it is free from certain contaminants ?

The Norwegian industry is moving ahead in several parameters and BAP needs to remain relevant.

Response from BAP:

The objective of the BAP Feed Mill standard, along with BAP Farm standards, is to create incentives for responsible farming and responsible practices along aquaculture supply chains. However, they also selectively target the chains over which they can have the greatest positive influence. This accounts for the current attention to requirements relating to marine ingredients (fishmeal and fish oil) for which the aquaculture industry is by far the biggest customer. In contrast, the aquaculture industry has far less leverage on supply chains for terrestrial ingredients because it is a relatively small player.

For the Feed Mill standard, MSC is designated 'primary' and IFFO RS (MarinTrust) 'secondary' but material from both sources is accepted to meet the 50% and 75% inclusion targets. FIP material is also allowed in countries where there are no national supplies of IFFO RS (MarinTrust) or MSC material.

The Feed Mill Standard has no rating of fish oils depending on their purity. However, there is an incentive to make use of any alternatives to marine ingredients. This arises because there are incentives to reduce inputs of marine ingredients for which there are increasingly strict sourcing requirements. Additionally, the BAP Farm standards apply FIFO (and soon FFDR) limits and these incentivise the use of alternatives to marine ingredients. These FIFO and FFDR limits are periodically lowered to ensure the BAP standard remains relevant.

As regards contaminants, The Feed Mill standard includes HACCP controls to address any feed safety issues arising from these. And the presence of any antioxidants must be labelled.

Section 3 - General Comment

Comment:

There is no stated targets for pathogen control or heat treatment

Response from BAP:

No specific targets are set but the guidance and compliance criteria address the requirements for the control of pathogens. This is the approach Adopted. in other compound feed manufacturing standards how does *BAP* calculate and/or weigh the various outcome of the environmental parameters to be audited to provide a ranking/rating to the feedmill?

Section 3 - General Comment

Comment:

For marine and soy ingredients: It would be useful if BAP explained how the targets for certified marine ingredients (50% going to 75%, and 100% for salmonids) and soy-ingredients (50% by 2022) are chosen.

Response from BAP:

Targets are intended to stretch the feed industry globally, not to be unobtainable and to maximise the overall positive impact.

Page 5 states: *BAP standards are developed by committees of technical experts following a process aligned to the FAO Technical Guidelines on Aquaculture Certification.*

Section 3 - General Comment

Comment:

They state a commitment to 75% certified sources of fishmeal and fish oil by 2025? Salmon however is stricter at 100%.

I would question why other fish types are less than 100% and why also the timescale 2025?

Response from BAP:

BAP requirements for certified marine ingredients set a rising bar and vary for different industries. They are designed to incentivize improvements as well as deliver assurances. Thus, they are set higher for salmon farms that have better access to certified marine ingredients than for tropical farms for species like shrimp, tilapia and Pangasius, where certified sustainable marine ingredients are far less obtainable (current target 50% rising to 75% in 2025). The global target of 75% by 2025, is identical to the global target set by the leading certification program for marine ingredients (IFFO RS/MarinTrust).

Note that the 100% target for salmon feeds has now been reduced to 75% because 100% was judged unobtainable. This is because the BAP Feed Mill standard applies to all of the feed produced by the feed mill. Alternative standards, such as the draft ASC feed standard, only apply to batches or portions of the

feed produced so a 100% target is attainable for such standards, especially when the mass balance calculation method is used.

Section 3 - General Comment – Page 10

Comment:

Sub heading “Sustainability of key inputs...”

Proposed Change:

All feed ingredients should be sustainably sourced. Why is this section restricted to ‘key inputs’? Rather extend to all ingredients.

Response from BAP:

The Implementation guidance does state: *‘Aquafeed producers have an important role in adopting sustainable sourcing policies’*. However, the content of the auditable clauses is restricted to ‘shall’ statements.

The BAP program selectively targets the supply chains over which it can have the greatest positive influence. Hence the focus on ‘key’ inputs.

Section 3 - General Comments – Page 10

Comment:

Preamble: “Feed mills shall actively....”

Proposed Change:

Add: “Feed mills shall proactively assess and vigorously adopt innovative marine free new ingredients (e.g. alternative oils and protein sources) that can contribute positively to the sustainability and nutritious value of aquafeed.”

Response from BAP:

The Implementation guidance does state: *Important substitutes for proteins and oils from reduction fisheries include meals and oils from plants, rendered animal proteins and fish-processing by-products from sustainable or non-threatened fisheries.*

However, the BAP Feed Mill standard avoids ‘picking winners’ and does not single out particular alternatives such as algae oils, single cell proteins, insect meals or polychaete meals. These innovative products will succeed on their own merits and the BAP Feed Mill and farm standards already include incentives for their uptake.

Section 3 - General Comments – Page 10

Comment:

“Reason for Standard” & “Implementation” sections: In addition to exerting positive influence on existing supply chains for marine and terrestrial ingredients, innovative ingredients are also an important element in the sustainability strategy. But this is not mentioned.

Proposed Change:

These sections also need to assert the role that feed mills are expected to have in supporting the development and adoption of new feed ingredients. This applies both through collaborating with innovators during the development of new ingredients and also (and most importantly) in the adoption of those new ingredients into commercial formulations, without delay, once they are available at scale.

Response from BAP:

Innovative ingredients certainly are an important element in the sustainability strategy of feed mills and the BAP Program includes incentives for their uptake.

Section 3 - General Comments – Page 11

Comment:

Calculation of FIFO and FFDR... to “...exclude meal or oil derived from by-products such as trimmings...”

Proposed Change:

How is the sustainability of the fish by-products and trimmings regulated? Isn't there a risk here that material from IUU fish (e.g. some Tuna fisheries) is unwittingly discounted from the formula?

Response from BAP:

Feed mills are required to develop and implement action plans to exclude any IUU derived products. Such plans may include sourcing products from MSC certified fisheries and IFFO RS (MarinTrust) certified factories and approved fisheries.

Section 3 - General Comments – Page 11

Comment:

Calculation of FIFO and FFDR... “...feed mills should supply farmers with more precise estimates (of processing yields)...”

Proposed Change:

This could be stronger. E.g. “must” instead of “should” in order to improve the accuracy and accountability in calculation of FIFO and FFDR

Response from BAP:

This remains a recommendation rather than a requirement because the default yield values (22.5% for fishmeal; 5% for fish oil) are supported in the literature and generally adequate.

Section 3 - General Comments – Page 12

Comment:

Standards: FIFO and FFDR limits are not detailed in the standards. Why is this?

Proposed Change:

We recommend that FIFO and FFDR standards should be detailed in the Feed Mill Standard as well as (or instead of) the Farm standards. Opportunity should be taken to control these metrics at source, set standards for continuous improvement and hold feed millers accountable for reducing the industries dependency on limited marine resources. This can be achieved now by encouraging the adoption of new innovative ingredients to further reduce FIFO and FFDR. This is critical to enabling the sustainable growth of aquaculture in future and protecting our oceans at the same time.

FIFO levels of 1.5 for salmonids is out-of-date. Lower FIFO levels (e.g. 0.8) are already achieved today by leading players. So, with the introduction of innovative new ingredients, these standards should be tightened for salmon and for other species. Perhaps a FIFO standard of 0.7 for salmon is a more reasonable target today?

Response from BAP:

Meeting FIFO and FFDR targets amounts to a collaboration between feed manufacturers and farmers. However, the farmer is responsible for feed selection, feed management, attaining good feed conversion and good survival rates. Hence the farmer has the greatest control over the eventual FIFO or FFDR and it makes sense to set the relevant requirements in farm standards rather than feed mill standards.

Within the BAP program, the FIFO and FFDR limits are currently under review for salmon and other farmed species and the increasing role of alternative ingredients is taken into account. The next version of the BAP Salmon Farm standard is likely to require a FFDR (oil) rather than a FIFO calculation and this will focus attention on efficient usage of marine oil inputs, thereby incentivizing alternative sources of high-grade oils.

Clause 3.1

Comment:

“...species and fishery origins...”

Proposed Change:

Add “..species and fishery origins and sustainability credentials...”

Response from BAP:

Clauses 3.2(now 4.2), 3.4 (now 4.4) and 3.5 (now 4.5) address sustainability credentials

Clause 3.2

Comment:

What corrective action plan that follows after an IUU material is discovered?

Feed Mill should also inform customers as well.

Proposed Change:

3.2: The feed mill shall report to the Certification Body **and customers** in the event of usage of any IUU material. **A corrective action plan should be put in place that includes identification of root cause, immediate corrective action and prevention.**

Response from BAP:

Adopted. with edits: *4.2The facility shall not source raw material from IUU fisheries. It **shall have documented procedures of corrective actions** in the event of usage of any raw material sourced from IUU fisheries **and shall prevent recurrence.***

Clause 3.3

Comment:

In practice, this indication could be extremely difficult to collect and I doubt it will be applied. Also, in a way in contradiction with your statement “To protect proprietary information, feed mills are not required to provide physical or digital copies of documents such as feed formulas”. During audits, the feed plant shall collect these data.

On demand, feed plants shall transmit at least once in a year to farmers.

Proposed Change:

During audits, the feed plant shall collect these data.

On demand, feed plants shall transmit at least once in a year to farmers.

Response from BAP:

The existing clause already allows for ‘written declarations’ as well as labelling etc. so it should cover this concern.

Clause 3.3

Comment:

This clause brings a lot of misinterpretation from the feed plants staff as well as for the farmers. The clause shall be more direct. The feed plant will not be required to inform the formula percentage of fish

meal or fish oil. Feed mill staff shall be trained to calculate FFIF, and only this factor shall be reported to the clients.

Proposed Change:

Feed mills shall indicate the FFIF index on packaging, shipping documents, invoices, or in written declarations for all feeds.

Response from BAP:

In consultation with feed mills, it was considered a reasonable requirement to provide data on fishmeal and fish oil content, as specified. Without these data it will be impossible for farmers to calculate FFDRs

Clause 3.3

Comment:

This clause brings a lot of misinterpretation from the feed plants staff as well as for the farmers. The clause shall be more direct. The feed plant will not be required to inform the formula percentage of fish meal or fish oil. Feed mill staff shall be trained to calculate FFIF, and only this factor shall be reported to the clients.

Proposed Change:

Feed mills shall indicate the FFIF index on packaging, shipping documents, invoices, or in written declarations for all feeds.

Response from BAP:

In consultation with feed mills, it was considered a reasonable requirement to provide data on fishmeal and fish oil content, as specified. Without these data it will be impossible for farmers to calculate FFDRs

Clause 3.4

Comment:

The 'Plan of Action' should also address innovative ingredients

Proposed Change:

Suggest that applicant must also detail policies for assessment and adoption of innovative new ingredients, especially when such ingredients can improve the quality of the fish; e.g. omega-3 EPA and DHA.

Why not add an over-arching target for replacement of 10% of the formulation with innovative ingredients by say 2025? Aim being to reduce pressure on traditional feed ingredients. Forum for the Future's Feed Compass could be used as a means to assess and pre-qualify innovative ingredients.

Response from BAP:

As described in responses to public comments listed above, the BAP program targets areas where it can have the greatest positive influence over responsible practices in supply chains. The innovative ingredient industry has not been identified as a major source of sustainability concerns (e.g. as compared to marine ingredients, soy, palm oil) so there are no requirements targeted at this sector.

Clause 3.5 – Pages 10-12

Comment:

Implementation: Given that some feed manufacturers already claim that c.90% of ingredients are IFFO RS cert. there would seem to be room for a more ambitious target than “at least 75% fishmeal and oil from certified sources by June 2025” (50% now and 100% for salmonids)

Proposed Change:

Algal oil, rich in both EPA and DHA, should be specifically mentioned as an alternative substitute for fish oil that is available at scale already now. This ingredient can enable feed mills to achieve more ambitious targets on responsible sourcing now, whilst work is being done to evaluate and certify existing sources of marine ingredients.

Response from BAP:

The BAP program avoids ‘picking winners’ among alternative feed ingredients.

The availability of certified marine ingredients varies greatly in different parts of the world and is low, for example, in parts of Asia. Thus, although some countries and industries can approach 100% inclusion, this would be an unworkable target for others. Note that the 75% target for 2025, coincides with the IFFO RS (MarinTrust) target of 75% of global supplies certified by 2025. Note also that the 100% target for salmon feeds has been reduced to 75% because 100% was judged unobtainable. This is because the BAP Feed Mill standard applies to all of the feed produced by the feed mill. Alternative standards, such as the draft ASC feed standard, only apply to batches or portions of the feed produced so a 100% target is attainable, especially when the mass balance calculation method is Adopted..

Clause 3.5

Comment:

Para la harina y el aceite de pescado derivados de la pesca de reducción, al menos el 50% deberá provenir de fuentes con certificación MSC o IFFO RS. Alternativamente, cuando la harina y el aceite de pescado con certificación MSC o IFFO RS no se producen a nivel nacional, el porcentaje mínimo anterior puede comprender material de programas activos y aprobados de mejora de la pesca (FIP) según lo verificado por IFFO RS, SFP, WWF o FisheryProgress.org.

Proposed Change:

Para Ecuador, este requisito se lo cumple a través de las Harineras que están participando del Proyecto FIP. Por lo tanto el punto debería incluir la opción evidenciable de participar en un proyecto de Mejora.

Response from BAP:

See below

Clause 3.6

Comment:

Para las fábricas de piensos que producen, total o parcialmente, alimento para salmónidos, el 100% de la harina de pescado y el aceite de pescado derivado de la pesca de reducción procederá de fuentes con certificación MSC o IFFO RS. Alternativamente, cuando la harina y el aceite de pescado con certificación MSC o IFFO RS no se producen a nivel nacional, el porcentaje mínimo anterior puede comprender material de programas activos y aprobados de mejoradores de la pesca (FIP) según lo verificado por IFFO RS, SFP, WWF o FisheryProgress.org

Proposed Change:

Para Ecuador, este requisito se lo cumple a través de las Harineras que están participando del Proyecto FIP. Por lo tanto el punto debería incluir la opción evidenciable de participar en un proyecto de Mejora.

Response from BAP:

See below

Clause 3.5 & 3.6

Comment:

For Ecuador this requirement is compliance through industries' fish meal participation in FIP Project, therefore the point should include the evident option of participating in an Improvement project.

Proposed Change:

For fishmeal and fish oil derived from reduction fisheries, at least 50% shall come from sources that are either MSC- or IFFO RS-certified. Alternatively, where MSC- or IFFO RS-certified fishmeal and fish oil

are not produced nationally, the above minimum percentage can comprise material from active, approved fishery improver programs (FIPs) as verified by IFFO RS, SFP, WWF or FisheryProgress.org. If they are not certified, it will be accepted that the factories that provide fishmeal are participating in an Improvement Project.

Response from BAP:

Participation in a FIP is a first step but it is not enough to meet the standard, which calls for MSC or IFFO RS (MarinTrust) certified sources or sourcing from an independently verified FIP.

Clause 3.5 & 3.6

Comment:

Fully agree with these standards. Meanwhile, need to remind that some origins such as Mauritania, Senegal, Gambia... are not MSC, not IFFO RS and not or poorly scored by FISH SOURCE. Last Greenpeace report 2019 clearly shows the reality. How long will you accept these over-exploited stocks ?

Proposed Change:

ALL FM and FO shall be certified MSC or IFFO RS.

If not available, ONLY FM and FO from 100% fully traceable trimmings are allowed.

Application 06/2020.

Response from BAP:

The target for certified ingredients has been raised to 75% by 2025, in line with the IFFO RS (MarinTrust) target for global coverage. Progress with certified sourcing will rely on progress with relevant FIPs, which are only just getting started in W. Africa and SE Asia. The BAP program aims to incentivise global progress towards sustainable fisheries rather than set a very high bar that would be unworkable in some parts of the world and effectively exclude them.

Clause 3.6

Comment:

Are MSC and IFFO RS schemes considered equal? And if certified material is not produced nationally, are those alternative schemes considered equivalent?

Proposed Change:

We understand that IFFO RS is less rigorous than MSC in terms of the fisheries sustainability assessment piece. Therefore, there is a case for differentiating targets e.g. 100% IFFO RS now and 100% MSC by e.g. 2025?

Also, if certified material is not produced/available nationally, then it could be argued that alternatives (e.g. innovative ingredients) should be used instead of 'down-grading' the certification requirement.

Response from BAP:

The difference between IFFO RS (MarinTrust) and MSC does not relate to rigor. They are both rigorous (and full ISEAL member) programmes, but they are structured very differently. IFFO RS (MarinTrust) combines Chain of Custody, factory certification and fishery approval. MSC combines certification for the fishery and the Chain of Custody. IFFO RS (MarinTrust) will almost always approve a fishery if it is MSC certified.

The suggestion to require the purchase of innovative ingredients where certified sources of marine ingredients are not available, would reduce the incentive to set up FIPs and to move towards certification. It could also be cost-prohibitive in many industries.

Clause 3.6

Comment:

While in the first part of the paragraph it says that 100% shall come from MSC or IFFO, in the second part said that there could come from FIPs. All 100% could come from FIPs?. Is not clear. Could be important maintain just 3.5.

Response from BAP:

Adopted.. The alternative of sourcing from FIPs has been removed from clause 4.6 regarding salmonid feed producers

Clause 3.7 & 3.8

Comment:

Why waiting until June 2022 to request responsible Soy and Palm ?

Proposed Change:

Application Jan 2021.

Response from BAP:

Some lead time is needed to allow feed mills to adjust their sourcing policies. Also, the availability of responsible soy is currently very low in the southern hemisphere and it is hoped certification programs can expand.

Clause 3.7

Comment:

- 1- The date of applicability is too far away. Illegal deforestation to produce soy hasn't really stopped in the last decade and soy ingredients contribute to a very big portion (often the biggest portion) of ingredients in fish diets. This requirement should be more ambitious and move the date for applicability sooner.
- 2- it would be useful to mention BAP position on RTRS credits. If the purchase of RTRS credits is accepted as a way to demonstrate commitment, the standard should explicitly say so. Also, drawing the attention to RTRS credits would make it easier for producer to transition to responsible soy by 2021.

Proposed Change:

Applicable after June 2021

3.7: For soymeal and other soy derived ingredients, at least 50% shall come from sources that are certified to ProTerra, RTRS, SSAP or to other standards successfully benchmarked against the FEAC Guidelines for Responsible Soy Sourcing. **The purchase of RTRS credits is also an acceptable tool to demonstrate compliance**

Response from BAP:

Adopted.

Clause 3.9

Comment:

1) 25% increase from 50% within 5 years is slow when end customers are already requesting 100% certified marine material.

The link below may be helpful:

<https://thefishsite.com/articles/report-highlights-major-sustainability-disparities-in-fishmeal-and-fish-oil-trade>

Since this requirement is specific to 'reduction fisheries' only, it would be feasible to raise the bar to 100%

without making it too difficult for mills to comply.

2) More attention is needed on meals and oil made from fish **by-products**. The standard reports that the mill should have a plan of action to exclude fish **by-products** from 'unsustainable' fisheries (page 8) but there is no requirement for reporting such commitment. This causes a lack of transparency on the risk and links to IUU fishing when mills produce feed made primarily with by-products, which is often the case.

Proposed Change:

Applicable after June 2025

3.9: For fishmeal and fish oil derived from reduction fisheries, at least 75% 100% shall come from sources that are either MSC- or IFFO RS-certified. Alternatively, where MSC- or IFFO RS-certified fishmeal and fish oil are not produced nationally, the above minimum percentage

can comprise material from active, approved

improvers programs as verified by IFFO RS, SFP, WWF or FisheryProgress.org.

NEW REQUIREMENT:

For fishmeal and oil made from fish by-products there shall be a robust system in place able to demonstrate that these come from well managed fisheries.

Response from BAP:

The cited article highlights very real issues and comes from the Sustainable Fisheries Partnership which is promoting FIPs as part of the solution. The BAP target for certified ingredients has been raised from 50% to 75% by 2025, in line with the IFFO RS (MarinTrust) target for global coverage. But progress with certified sourcing will rely on progress with relevant FIPs, which are only just getting started in W. Africa and SE Asia. The BAP program aims to incentivise global progress towards sustainable fisheries rather than set a very high bar that would be unworkable in some parts of the world. Some customers are indeed asking for 100% certified marine ingredients (and BAP recognises this is feasible, at least for discreet batches of feed) but others recognise that 100% is an unrealistic and unhelpful target for promoting positive change globally. Note that the BAP Feed Mill standard applies to the entire annual

output of the mill not just selected batches aimed at customers seeking 100% certified marine ingredients.

Section 4 – Implementation Guidance

Comment:

Hazardous chemicals could be contained in steel container with appropriate isolation and secondary fuel containment. There is approved by local regulations of Chile.

Proposed Change:

Hazardous chemicals shall be stored in locked, well-ventilated, water-tight buildings. The floors should slope to a center basin for containing spills. Warning signs shall be posted.

Response from BAP:

Steel containers would not be appropriate for all chemicals. The existing wording is considered adequate:

Hazardous chemicals shall be stored in locked, well-ventilated, water-tight buildings. The floors should slope to a center basin for containing spills. Warning signs shall be posted.

Section 4 – Page 13

Comment:

Standards for labelling should be clarified

Proposed Change:

Suggest reference to Global Harmonised Standards (GHS) and Classification Labelling Packaging (CLS)

Response from BAP:

Reference inserted

Clause 4.1

Comment:

El combustible, los lubricantes y los productos químicos potencialmente peligrosos o tóxicos deben almacenarse y eliminarse de manera segura y responsable.

Proposed Change:

Puede unirse con 4.3. Tienen sinergias

Response from BAP:

Not Adopted.

Clause 4.3

Comment:

Las áreas de almacenamiento de combustible, lubricantes y químicos deben estar marcadas con señales de advertencia.

Proposed Change:

Puede unirse con 4.1. Tienen sinergias

Response from BAP:

Not Adopted.

Clause 4.5

Comment:

La contención de combustible secundario debe cumplir con las pautas BAP para el almacenamiento de combustible

Proposed Change:

Puede unirse con 4.1, 4.3.

Response from BAP:

Not Adopted.

Clause 4.1, 4.3, & 4.5

Comment:

You can unify with the item 4.3, 4.5

Proposed Change:

Fuel, lubricants and potentially dangerous or toxic chemicals shall be stored and disposed of in a safe and responsible manner and shall be marked with warning signs and the secondary fuel containment shall conform to BAP guidelines for fuel storage.

Response from BAP:

Not Adopted.

Clause 5.6

Comment:

The sentence is vague. Which audit report does it refer to, BAP audit? Indicating the goal of including this information would make it clearer and effective. For example, "Direct fuel, electricity and water consumption shall be monitored with the aim of reducing input/MT feed..."

Wording modified for clarity:

6.6: The feed mill shall keep records of mean annual direct energy consumption (kWh/MT of feed) and annual water usage (m³/MT of feed). Note: Auditors must include this data in the audit reports.

And a sentence added to the Guidance to explain the aim: *These data are collected with the aim of increasing efficiency and reducing impacts over time.*

Clause 5.6

Comment:

Text shall be clear and direct.

Proposed Change:

5.6 Mean annual, direct energy consumption (kWh/MT feed) and water usage (m³/MT feed) shall be calculated and available for auditor inspection.

Response from BAP:

In fact, the intention of this clause is to make sure the data are included in the audit report so that they can be compiled anonymously and analysed centrally by the BAP Program. It would not be enough just for the auditor to inspect the data. Please refer to new 6.6 wording above.

Section 6 – General Comment

Comment:

Limited details on supplier approval process (assured suppliers) and transport of raw materials.

Currently I would not consider to be equivalent to UFAS, GMP+ etc

Response from BAP:

These aspects are not addressed to the same level of detail as UFAS or GMP+ but equivalency with UFAS and GMP+ is not intended. The BAP Feed Mill standard is designed to go much further and to address issues of feed sustainability and social accountability as well as safe feed production.

Section 6 – Page 15

Comment:

Sub-heading: “HACCP Process Controls, Good Manufacturing Practices” and body text

Proposed Change:

HACCP acronym should be expressed.

Avoid use of GMP acronym unless referring to the pharmaceutical GMP standard? To avoid risk of confusion.

Response from BAP:

The meaning of the HACCP acronym is now given.

GMP, expressed at first usage (Good Management Practices), is retained because it's not expected to cause confusion with a specific set of GMPs for pharmaceuticals

Section 6 – Page 15

Comment:

Reason for Standard: “Unless feed producers control what is incorporated into their feeds...”

Proposed Change:

Add “...and control how the feed is produced.”

Response from BAP:

Adopted.

Section 6 – Page 15

Comment:

The word toxicants might not be appropriate in this context

Proposed Change:

Change the word toxicants by contaminants in the sentence : ‘Analytical testing of ~~toxicants~~ contaminants shall follow...’

Response from BAP:

Adopted.

Section 6 – Page 15

Comment:

Implementation: Risk of chemical contamination (e.g PCBs and Dioxins)

Proposed Change:

In view of EFSA recommending a 7x reduction in TWI, perhaps it should be addressed? E.g. Feed millers must take steps to eliminate the levels of these contaminants in feed ingredients.

Response from BAP:

There is a reference to the FAO Code of Good practice regarding these contaminants and the existing wording in the Implementation guidance is considered adequate. It states:

At a minimum, the hazard analysis shall address:

- Risks of chemical contamination of ingredients and/ or finished products with dioxin/PCBs, medicinal substances, feed additives, heavy metals (including lead, mercury and cadmium), mycotoxins, pesticides and industrial contaminants.

Section 6 – Page 15

Comment:

Although it is a requirement that ingredients meet statutory standards, it might be appropriate to promote the use of alternatives to compliant (contaminated) ingredients

Proposed Change:

Add a sentence after the chapter of contaminants such as : 'Periodic sampling [...] human health hazards. When available, feed mills should strive choosing less contaminated alternative ingredients.

Response from BAP:

Application of HACCP already promotes a consistent approach to controlling contamination risks

Section 6 – Page 15

Comment:

The contamination of the final product is mainly linked with the contamination of incoming materials. It might be of interest to give an incentive for feed producers purchasing their ingredients for low/non contaminated sources.

Proposed Change:

Add a sentence after the first sentence of the second chapter:

'Process controls [...]chemical contamination and mislabeling. The periodicity of the control may be reduced, if the use of ingredients with a low level of contamination are used, based on the HACCP principle.

Response from BAP:

Application of HACCP already promotes a consistent approach to controlling contamination risks

Clause 6.7

Comment:

El solicitante deberá mantener registros actuales y precisos que detallen el monitoreo, la verificación y las acciones correctivas según lo requiera el plan HACCP o un sistema equivalente.

Proposed Change:

Se puede unificar con 6.13. Tienen sinergias.

Response from BAP:

Yes, there is an overlap but 6.13 (now 2.6) adds important detail.

Clause 6.10

Comment:

The mention “A Quality management plan” is ambiguous and produces confusion during implementation and audit. Is not a technical name used in ISO 9000 vocabulary standard. I suggest detail this phrase. Define the concept desire and use ISO 9000 vocabulary.

What is the certified third party audit. It’s means ISO 9001 or BAP standard?

Is not clear if is refer about a system management or quality control management.

(If you need additional comments or help, please tell me)

Proposed Change:

A quality management system shall be established, implemented, documented and maintained. The quality management system shall demonstrate compliance with all applicable legislation and subject to a certified third-party audit as ISO 9001 or equivalent.

Or...

A quality control plan shall be established, implemented, documented and maintained. The quality control plan shall demonstrate compliance with all applicable legislation and subject to a certified third-party audit as ISO 9001 or equivalent.

Response from BAP:

Corrected to: ‘quality management system’

*6.10: (now 2.11) A **quality management system** shall be established, implemented, documented and maintained. The quality management system shall demonstrate compliance with all applicable legislation and be subject to a third-party audit.*

Clause 6.

Comment:

Los controles de proceso deben identificar los procedimientos de monitoreo para cada peligro identificado en cada punto de control crítico que incluye frecuencia, asignación de tareas, límites críticos derivados científicamente y métodos de monitoreo y mantenimiento de registros. Los procedimientos de monitoreo deben contener detalles sobre cómo se toman las mediciones y la frecuencia.

Proposed Change:

Se puede unificar con 6.7. Tienen sinergias.

Response from BAP:

Yes, there is an overlap but 6.13 (now 2.6) adds important detail.

Clause 6.7 & 6.13

Comment:

You can unify with the item 6.13.

Proposed Change:

The applicant shall maintain current, accurate records that detail monitoring, verification and corrective actions as required by the HACCP plan or equivalent system and the Process controls shall identify monitoring procedures for each identified hazard at each critical control point that include frequency, assignment of task, scientifically derived critical limits, and monitoring and record - keeping methods. Monitoring procedures shall contain details on how the measurements are taken and the frequency.

Response from BAP:

Yes, there is an overlap but 6.13 (now 2.6) adds important detail.

Clause 6.14

Comment:

....as verified by pathogen tests

With reference to the term “ingredients from *like* aquaculture organisms” – the term “*like*” is highly subjective – particularly when looking at crustaceans.

I have concerns specifically about the section of testing to OAE pathogens. The challenge you have is that you say you can treat with heat and enzymes - you miss acid by the way, but then you say in the HACCP section “and outcomes (**as verified by pathogen tests**) shall be conducted annually by a food or feed safety auditor with qualifications and training meeting the GAA norms defined in Sections 3.63 and 3.64 of the CB”. Firstly the section regarding testing will show that DNA is present. It doesn’t matter if you have heat treatment or enzyme treatment, you will get positives for DNA by qPCR. The DNA won’t be viable – we have tested this, but it will be positive. Additionally, NATA accredited labs are failing to show the annealing curves or the number of cycles in the test so many labs are not interpreting their methodology or data correctly. Additionally, it should be noted –although you know, that these pathogens are not species specific but subphylum specific so all farmed and wild crustaceans are potential carriers.

Response from BAP:

To address this kind of concern the requirement in the Feed Mill Standard has been made more specific it now reads:

2.37: The facility shall not incorporate proteins from the same genus as the animal destined to be fed. But protein hydrolysates of <10,000 Daltons are permissible.

Section 6 –General Comment

Comment:

Protein hydrolysates are permitted. (Can you please explain the acceptance of less than 10,000 Daltons of the same genus as the species)

Response from BAP:

This allowance for protein hydrolysates, and the 10,000 daltons limit are consistent with EU legislation:

REGULATION (EC) No 999/2001 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 22 May 2001 laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies

Annex IV

3. *The prohibition laid down in Article 7(1) and (2) shall not apply to the following products from healthy animals:.....etc.*

Clause 6.15

Comment:

I consider necessary clarify if the internal audit is respect this standard or any other standard. It is common that CFM plants have some certifications .

Effectiveness should be mentioned with a base and could be subjective during an audit.

Proposed Change:

6.15 : There shall be a planned program of internal audits carried out by suitably trained members of staff at least annually to ensure that all the company procedures are complied with this standard.

Response from BAP:

Modified to: 2.15: *There shall be a planned program of internal audits carried out by suitably trained members of staff at least annually to ensure that all company procedures **and the requirements of the BAP Feed Mill Standard** are complied with and effective.*

Clause 6. 22

Comment:

There are some reasons that a feed could be returned to the factory, not necessary is a risk for feed in process. For example a document mistake or problems with the transport.

Send this product to the garbage affect environmental goals of the factories based on responsible reduction.

Proposed Change:

6.22 : Feeds delivered to farms shall not be returned for rework it is represent a risk of food safety for the process. The HACCP responsible should accept the product. A written report should be conserved as evidence of the approval. Unapproved rework shall be dealt with as waste.

Response from BAP:

as worded is considered best practice. It does not state that feeds returned from farms should go to waste - it just states that they should not go for rework. E.g. if the feed is returned for the reasons you cite, it could go back to the farm once the documentation or transport problems have been resolved.

Now reworded to:

2.20: Reworks and the rework process shall be documented with limitations including, but not limited to, prohibiting rework on feed containing medicinal ingredients, feed returned from farms, and unapproved feed products. Unapproved rework shall be dealt with as waste.

Clause 6.24

Comment:

Is important for new employees receive an induction about HACCP

Proposed Change:

6.24 : All new employees of the facility shall complete a formal induction program that includes HACCP and Bap Feed mills concepts.

Response from BAP:

This is largely addressed through 2.23 (please see below)

Clause 6.25

Comment:

I suggest mention that refers about facility staff as wages and supervisors.

Proposed Change:

6.25 : All facility employees shall have appropriate levels of competence and be trained in the tasks they are required to perform together with personnel hygiene, HACCP, food safety and customer requirements.

Response from BAP:

Typo corrected: 2.23 : *All employees shall have appropriate levels of competence and be trained in the tasks they are required to perform together with **personal** hygiene, HACCP, food safety and customer requirements.*

Clause 6.38

Comment:

Is not clear if it refers to the medicated feed manufacturing (For example, Biomar) or the laboratory that supplies medicine for adding to the feed.

Proposed Change:

6.38 : Producers and suppliers of feed medication products to be added to the feed shall be certified to international pharmaceutical standards.

Response from BAP:

(now 2.38) Refers to *'Producers and suppliers of feed medication products'* not the feed millers

Clause 6.38

Comment:

What are acceptable proofs of certification to international pharmaceutical standards? Which certifying bodies are considered qualified to certify?

Response from BAP:

The clause has been modified and a reference to relevant international standards inserted:

*6.38 (now 2.38): Producers and suppliers of feed medication products shall be certified to **GMP-based** international pharmaceutical standards.*

New reference:

IPSE compiled links to international GMP regulations and resources: ispe.org/gmp-resources/regulations

Clause 6.48

Comment:

The Canadian Food Inspection Agency requires that validation only be completed once or if there is a change to the system.

Proposed Change:

The flushing procedure shall specify the quantity and type of material to be used and appropriate validation carry-over tests completed based on regulatory requirements.

Response from BAP:

Reworded:

*6.48 The flushing procedure shall specify the quantity and type of material to be used and appropriate validation carry-over tests completed at least annually **or based on regulatory requirements.***

General Comment

Comment:

Flush procedures are limited to the mixers only

Response from BAP:

It's unclear where the BAP Feed Mill standard limits flushing procedures to mixers only. Flushing requirements are:

2.47: The feed mill shall have specific procedures and flushing requirements for the production of medicated feeds.

2.48 : The flushing procedure shall specify the quantity and type of material to be used and appropriate validation carry-over tests completed at least annually or based on regulatory requirements.

2.49 : All flush batches shall be recorded, and the identity and destination of the flush material controlled and recorded.

Section 7 – Page 20

Comment:

Replace raw materials by ingredients for consistency reasons. The wording 'raw materials' should be replaced by 'ingredients in all the Section

Proposed Change:

To establish product traceability, specified data shall be recorded for both ~~raw materials~~ ingredients and finished products

Response from BAP:

Adopted.

Section 7 – Page 21

Comment:

In point 7.3

Proposed Change:

Ingredient type, species and fishery origins for marine ingredients, if appropriate

Response from BAP:

Adopted

Clause 7.3

Comment:

Traceability to include vessels list and flag

Proposed Change:

7.3: Traceability records shall be maintained for all incoming ingredients for each of the following parameters:

- ingredient type
- species, fishery origins (FAO area), and fishing vessel name and flag for marine ingredients
- bag size
- date received
- packaging type
- shipper's name, address and contact details
- unique lot number
- supplier's name, address and contact details
- quality comments
- unloading assignment
- receiver's signature
- bulk quantity or number of bags
- expiration date, if applicable

Response from BAP:

FAO Area – Adopted. but Fishing vessel name and flag would amount to an unworkable amount of detail. Fishing vessel lists would be required/available in an IFFO RS (MarinTrust) certified fishmeal factory.

Clause 7.5

Comment:

Additional information to record

Proposed Change:

7.5: Traceability records shall be maintained for finished feed products for each of the following parameters to allow

tracing of feed back to the inputs of origin:

- manufacturing date
- drug inclusion(s)
- ingredient source(s) including all additives
- expiration date for medicated feed, if applicable
- feed type mixed

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- sequencing and flushing
- formulation details
- dispatch date **and time**
- processing conditions
- name, address and contact details for transporter, **including vehicle plate number**
- unique lot number
- name, address and contact details for destination/ purchaser
- actual yield (including BAP certification number, if applicable)
- mixing personnel
- off-specification feed, especially
- bin assignment for medicated feed.

Response from BAP:

Adopted.

Clause 7.6 & 7.7

Comment:

You can unify with the item 7.7

Proposed Change:

The traceability system of the installation consists of records comp paper files or electronic data. In the event that data is transferred from paper files to electronic data, physical records must be maintained to verify the information.

Response from BAP:

However, 7.7 could also refer to non-paper, non-computer records such as audio or photographic so 7.6 and 7.7 don't overlap completely.