

ASC Audit report template - Content

Form 3 - Public Disclosure Form

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VII. List of sites

Form 3 - Public Disclosure Form

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

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

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

This form should be translated into local languages when appropriate

PDF 1 Public Disclosure Form

PDF 1.1 Name of CAB: DNVGL Business Assurance

PDF 1.2 Date of Submission: June 15, 2018

PDF 1.3 CAB Contact Person

PDF 1.3.1 Name of Contact Person: Sander Buijs
Karin van de Braak

PDF 1.3.2 Position in the CAB's organisation: Global Accreditation Officer Seafood
Lead Auditor

PDF 1.3.3 Mailing address: Veritaveien 1, 1363 Høvik, Bærum, Denmark
Zwolseweg 1, 2994 LB Barendrecht, The Netherlands

PDF 1.3.4 Email address: Sander.Buijs@dnvgl.com
karin.van.de.Braak

PDF 1.3.5 Phone number: +31611390923

PDF 1.3.6 Other: OSL Certification.ASCfarm@dnvgl.com

PDF 1.4 ASC Name of Client

PDF 1.4.1 Name of Company: Sashimi Royal A/S

PDF 1.4.2 Name of Contact Person: Mr. Claus Rom

PDF 1.4.3 Position in the client's organisation: Director

PDF 1.4.4 Mailing address: Nordre Strandvej 66
7730 Hånsbølholm
Denmark

PDF 1.4.5 Email address: admin@sashimiroyal.com

PDF 1.4.6 Phone number: +45 (0)92726111

PDF 1.4.7 Other: N/A

PDF 1.5 Unit of Certification

PDF 1.5.1 Single Site:

PDF 1.5.2 Multi-site:

PDF 1.5.3 Group certification:

PDF 1.6 Sites to be audited

Site Name	GPS Coordinates	Other Location Information	Planned Site Audit(s)	Date of planned audit
Sashimi Royal	57.134358 / 8.630030	N/A	September 3-5	sep-18

PDF 1.7 Species and Standards

Standard	Species (scientific name) produced	Included in scope (Yes/No)	ASC endorsed standard to be used	Version Number
Abalone				
Bivalve				
Freshwater Trout				
Pangasius				
Salmon				
Shrimp				
Tilapia				
Seriola/Cobia	<i>Seriola lalandi</i>	Yes	ASC Seriola	V 1.0
Other				

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

Name/Organisation	Relevance for this audit	How to involve this stakeholder (in-person/phone interview/input submission)	When stakeholder may be contacted	How this stakeholder will be contacted
Thisted Kommune	Municipality	Email - To be decided by stakeholder	During announcement on ASC website	Email
Dansk Akvakultur	Aquaculture	To be decided by stakeholder	During announcement on ASC website	Email
DanForel	Aquaculture	To be decided by stakeholder	During announcement on ASC website	Email
WWF Denmark	NGO	To be decided by stakeholder	During announcement on ASC website	Email
DN, Sportsfiskeforbundet	Sport Fishing	To be decided by stakeholder	During announcement on ASC website	Email
Miljø- og Fødevarerministeriet	Governmental	To be decided by stakeholder	During announcement on ASC website	Email
Naturfredningsforening	NGO - The Danish Society for Nature Conservation	To be decided by stakeholder	During announcement on ASC website	Email
Royal Danish Fish A/S	Neighbour & Processing	To be decided by stakeholder	During announcement on ASC website	Email
FF Skagen Fish meal	Neighbour & Fish meal factory	To be decided by stakeholder	During announcement on ASC website	Email

PDF 1.9 Proposed Timeline

PDF 1.9.1 Contract Signed: June 2018

PDF 1.9.2 Start of audit: September 3, 2018

PDF 1.9.3 Onsite Audit(s): September 3-5, 2018

PDF 1.9.4 Determination/Decision: Certified dd 11-12-2018

PDF 1.10 Audit Team

Column1	Name	ASC Registration Reference
PDF 1.10.1 Lead Auditor	Karin van de Braak	N/A
PDF 1.10.2 Technical Experts	N/A	N/A
Translator	Peter Bjørklund	N/A
PDF 1.10.3 Social Auditor	Karin van de Braak	N/A

ASC Audit Report - Opening

General Requirements	
C1	Audit reports shall be written in English and in the most common language spoken in the areas where the operation is located.
C2	Audit reports may contain confidential annexes for commercially sensitive information. <ul style="list-style-type: none"> C2.1 The CAB shall agree the content of any commercially sensitive information with the applicant, which can still be accessible by the ASC and the appointed accreditation body upon request as stipulated in the certification contract. C2.2 The public report shall contain a clear overview of the items which are in the confidential annexes. C2.3 Except for the annexes that contain commercially sensitive information all audit reports will be public.
C3	The CAB is solely responsible for the content of all reports, including the content of any confidential annexes.
C4	Reporting Deadlines for certification and re-certification audit reports (in working days) <ul style="list-style-type: none"> C4.1 Within thirty (30) days of the completing of the audit the CAB shall submit a draft report in English and the national or most common language spoken in the area where the operation is located. C4.2 Within five (5) days the ASC should post the draft report to the ASC website. C4.3 The CAB shall allow stakeholders and interested parties to comment on the report for fifteen (15) days. C4.4 Within twenty (20) days of the close of comments, the CAB shall submit the final report to the ASC in English and the national or most common language spoken in the area where the operation is located. C4.5 Within five (5) days the ASC should post the final report to the ASC website. C4.6 Audit reports shall contain accurate and reproducible results.
C5	Reporting Deadlines* for surveillance audit reports <ul style="list-style-type: none"> C5.1 Within ninety (90) days of the completing of the audit the CAB shall submit a final report in English and the national or most common language spoken in the area where the operation is located. C5.2 Within five (5) days the ASC should post the final report to the ASC website. C5.3 Audit reports shall contain accurate and reproducible results.

1 Title Page	
1.1 Name of Applicant	Sashimi Royal A/S
1.2 Report Title [e.g. Public Draft Certification Report/Final certification report/Surveillance report]	Public Draft Certification Report
1.3 CAB name	DNV GL
1.4 Name of Lead Auditor	Karin van de Braak
1.5 Names and positions of report authors and reviewers	Karin van de Braak Mr. Kjell Roar Bekkevold (Technical Reviewer) Mr. Sander Buijs (Global Accreditation Manager DNV GL)
1.6 Client's Contact person: Name and Title	Mr. Claus Rom, Managing Director Mr. Palle Jensen, Quality Manager
1.7 Date	September 3-5, 2018

2 Table of Contents	
	Section 1: Form 3: Public Disclosure Form Section 2: Audit Report Opening Section 3: Audit Template - Seriola Section 4: Non Conformity Report form Section 5: Audit Report - Traceability Section 6: Audit Report Closing

3 Glossary	
Terms and abbreviations that are specific to this audit report and that are not otherwise defined in the ASC glossary	RAS: Recirculating Aquaculture System VHP: Veterinary Health Plan B-EIA: Biodiversity Environmental Impact Assessment P-SIA: Participatory Social Impact Assessment eFCR: Economic Feed Conversion Ratio IUCN: International Union for Conservation of Nature ISEAL: International Social and Environmental Accreditation and Labeling FAO: Food and Agriculture Organization FFDRm: Fishmeal Forage Fish Dependency Ratio FFDRo: Fish Oil Forage Fish Dependency Ratio DO: Dissolved Oxygen C/C: Chain of Custody CAB: Conformity Assessment Body

4 Summary	
A concise summary of the report and findings. The summary shall be written to be readable to the stakeholders and other interested parties.	
4.1 A brief description of the scope of the audit (including activities of the LOC being audited)	Grow-out production of Yellowtail Kingfish (<i>Seriola lalandi</i>) in land-based, indoor, closed recirculating aquaculture system (RAS) in Hanstholm, Denmark. The scope of the audit included all principles and criteria of the ASC Seriola Standard, Version 1.0. The audit included all farming related activities (on-site handling and document review), incl. harvest. For the social part, employees in different areas were interviewed during the on-site audit and meetings were held with the employees.
4.2 A brief description of the operations of the unit of certification	The production facility is 1 RAS system in the building. The maximum annual production capacity is expected at 1.200MT. The building is new and the first fish were stocked in June 2017. The fingerlings (50-80gr.) are obtained from Maximus, a sister company (both with Danish and Norwegian shareholders). The first fish were harvested in May 2018. Water is abstracted from the Skagerak (2km from the North Sea) by a pipeline 100m from the coast where the farm is located. The pipelines are located 90cm-1m below the sea bottom of the sea and the incoming water is filtered by the sand and collected in a tank before it is UV-treated and used for farming. Sludge and waste water is separated. The effluent water is going together with the effluent water of the (neighbouring) municipality waste water treatment plant effluent (in 1 pipeline) back into the Skagerak.
4.3 Type of unit of certification (select only one type of unit of certification in the list)	Single farm
4.4 Type of audit (select all the types of audit that apply in the list)	Initial Audit
4.4.1 Number of sites included in the unit of certification	Owned by client Subcontracted by client
Initial audit - 09/2018	1 0
Surveillance audit 1 - mm/yyyy	
Surveillance audit 2 - mm/yyyy	
Recertification audit - mm/yyyy	
4.5 A summary of the major findings	See Summary of findings-sheet.
4.6 The Audit determination	"Sashimi Royal is not yet compliant to the ASC Seriola Standard and may be considered compliant and recommended for certification only after satisfactory closure of Major non-conformances and satisfactory closure of a corrective action plan for Minor non-conformances is implemented by the client and approved by DNV GL. • Final certification decision will be taken in final report after completion of stakeholder period. • Until final certification decision by DNV GL the applicant is NOT yet certified and can not claim ASC Aquaculture certification status. Final decision expected before December 5, 2018."

5 CAB Contact Information	
5.1 CAB Name	DNV GL
5.2 CAB Mailing Address	Zwolseweg 1, 2994 LB Barendrecht, The Netherlands
5.3 Email Address	OSL.Certification_ASCfarm@dnvgl.com Sander.Buijs@dnvgl.com
5.4 Other Contact Information	N/A

6 Background on the Applicant	
6.1 Information on the Public Disclosure Form (Form 3) except 1.2-1.3. All information updated as necessary to reflect the audit as conducted.	Pieter Björklund is added as translator and local expert.
6.2 A description of the unit of certification (or amendments) / changes, if any (for surveillance and recertification audits)	The scope of the audits is a land-based, indoor (closed) RAS with 1 production system with 7 compartments in inner tank for the small fish and 6 compartments at the outer tank for the larger fish. Maximum annual production is estimated at 1.200MT.
6.3 Other certifications currently held by the unit of certification	No

6.4	Other certification(s) obtained by the LoC before this audit	N/A
6.5	Estimated annual production volumes of the unit of certification of the current year	300MT
6.6	Actual annual production volumes of the unit of certification of the previous year <i>(mandatory for surveillance and recertification)</i>	0
6.7	Production system(s) employed within the unit of certification <i>(select one or more in the list)</i>	Land-based, indoor, closed recirculating aquaculture system (RAS)
6.8	Number of employees working at the unit of certification <i>(see notes in comment to this cell)</i>	12
6.9	Size, and/or number of ponds, pens (if multi site, per site)	Indoor (closed) RAS in 1 production system with 13 compartments.

7	Scope	
7.1	The Standard(s) against which the audit was conducted, including version number	ASC Seriola and Cobia Standard, V. 1.0, October 2016
7.2	The species produced at the applicant farm <i>(in English and Latin names)</i>	Yellowtail Kingfish (<i>Seriola lalandi</i>)
7.3	A description of the scope of the audit including a description of whether the unit of certification covers all production or harvest areas (i.e. ponds) managed by the operation or located at the included sites, or whether only a sub-set of these are included in the unit of certification. If only a sub-set of production or harvest areas are included in the unit of certification these shall be clearly named.	The scope of the audit is grow-out facilities of Yellowtail Kingfish. Juveniles (50-80gr.) are obtained from Maximus (sister company) and stocked in 1 RAS for up to 4kg. The farm operates in 1 production system (divided in different compartments), which is the unit of certification, harvest included. In future, more production systems may be build and operated.
7.4	The names and addresses of any storage, processing, or distribution sites included in the operation (including subcontracted operations) that will potentially be handling certified products, up until the point where product enters further chain of custody.	Fish are held in purchasing tanks until harvest on-site. Fish are bled and transferred on ice in transport tubs to the processing site (subcontractor, CoC certified), where the fish are processed and packed. There is only 1 client: Nordic Sealfood (certified for ASC CoC). Fish leave the processing plant with handwritten label with date and time of harvest.
7.5	Description of the receiving water body(ies).	The receiving water body is the Skaggerak. Production water in RAS is mechanically and biologically filtered, before it is reused in the production system. In this way, water consumption per unit of fish production is reduced to the minimum. There is also a denitrification step in the process. The separated sludge is dried and taken off-farm by a designated sludge collector. The remaining waste water is UV-treated, before it is released into the municipality effluent water system that ends into the harbour in the Skagerak (near the North Sea).

8	Audit Plan	
8.1	The names of the auditors and the dates when each of the following were undertaken or completed: conducting the audit, writing of the report, reviewing the report, and taking the certification decision.	On-site audit: Karin van de Braak, September 3-5, 2018 Writing of the report: Karin van de Braak, September 3-5, 2018 Reviewing the report: Kjetil Bekkevold, September 2016 Taking the certification decision: Sander Buijs, tbd (after public consultation period - and when all NC's are closed).
8.2	Previous Audits (if applicable):	

NC reference number	Standard clause reference	Closing deadline - status - closing date of each NC
8.2.1	Initial audit - mm/yyyy	N/A. Initial audit.
	Surveillance audit 1 - mm/yyyy	
	Surveillance audit 2 - mm/yyyy	
	Recertification audit - mm/yyyy	
	Unannounced audit - mm/yyyy	
	NC close-out audit - mm/yyyy	
	Scope extension audit mm/yyyy	

8.3	Audit plan as implemented including:															
8.3.1	Desk Reviews	<table border="1"> <thead> <tr> <th>Dates</th> <th>Locations</th> </tr> </thead> <tbody> <tr> <td>aug-18</td> <td>Office, The Netherlands</td> </tr> <tr> <td>September 3-5, 2018</td> <td>Sashimi Royal site, Hanstholm, Denmark</td> </tr> <tr> <td>N/A</td> <td>No input received</td> </tr> <tr> <td>Sept. 2018</td> <td>The Netherlands</td> </tr> <tr> <td>Oct. 2018</td> <td>The Netherlands</td> </tr> <tr> <td>Dec 11, 2018</td> <td>The Netherlands</td> </tr> </tbody> </table>	Dates	Locations	aug-18	Office, The Netherlands	September 3-5, 2018	Sashimi Royal site, Hanstholm, Denmark	N/A	No input received	Sept. 2018	The Netherlands	Oct. 2018	The Netherlands	Dec 11, 2018	The Netherlands
Dates	Locations															
aug-18	Office, The Netherlands															
September 3-5, 2018	Sashimi Royal site, Hanstholm, Denmark															
N/A	No input received															
Sept. 2018	The Netherlands															
Oct. 2018	The Netherlands															
Dec 11, 2018	The Netherlands															
8.3.2	Onsite audits															
8.3.3	Stakeholder interviews and Community meetings															
8.3.4	Draft report sent to client															
8.3.5	Draft report sent to ASC															
8.3.6	Final report sent to Client and ASC															

8.4	Names and affiliations of individuals consulted or otherwise involved in the audit including: representatives of the client, employees, contractors, stakeholders and any observers that participated in the audit.	<p>Bo Thomas Christensen, Fishing ass. Prod. Brian Frost Mikkelsen, Fishing ass./Fishing ass. Prod. Christian Bidstrup, Technical dept./Maintenance Claus Rom, CEO, director Erlend Lind Mortensen, Finance manager Jens Knudsen, Production manager Lenette P. Blaabjerg, Administration/sales/marketing Palte Jensen, Quality coordinator Thomas Wagner Sandal, Technical manager Heidi (self-employed book keeper) Peter Bjørklund (DNV GL, Denmark)</p> <p>VR 179 approves ASC public documentation for Scandinavian farms to be published in English. ASC clarified that, given the fact that all Scandinavian countries (Sweden, Denmark, Norway) are rated as "very high" (resp. position 1,3,4) in the English ProFCI index (http://www.ef.nl/epi/).</p>
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8.5	Stakeholder submissions, including written or other documented information and CAB written responses to each submission at different stages of the certification process (audit notification, during on-site audit, public comment period)					
Name of stakeholder (if permission given to make name public)	Relevance to be contacted	Date of contact	CAB responded Yes/No	Brief summary of points Raised	Use of comment by CAB	Response sent to stakeholder
ASC	Yes	Nov. 2018	Yes	Level 2	Yes	Yes

8.6	ES. 1.i List of sites exempted from the scope of an initial audit and how they meet conditions in ES.1.i	N/A
8.6	ES. 1.ii Justification for auditing site(s) meeting conditions under ES.1.i	
8.7	ES. 1.1.i List of sites removed after the initial audit	
8.7	ES. 2.2 Reason for the removal of sites from the certificate.	
8.8	ES. 4 Map of sites included in the unit of certification has been attached	
8.9	ES. 5 Site(s) in following period included in the audit <i>(only for surveillance and re-certification audits)</i>	

AUDIT MANUAL - ASC SERIOLA/COBIA STANDARD					
Risk evaluation					
PRINCIPLE 1: COMPLY WITH ALL APPLICABLE INTERNATIONAL, NATIONAL AND LOCAL LAWS AND REGULATIONS					
1.1. Criteria: All applicable legal requirements and regulations where farming operation is located					
below by providing its risk category (low, medium or high) for each threat listed		Compliance Criteria (Use as guidance for audit only)	Evaluation (Per indicator, select one category in the drop-down menu)	Description of NC Provide an explanation of the reason(s) for the classification of any NCs or non-applicability	Value/ Metric Provide values - if applicable for the respective indicator
1.1.1	<p>Indicator: Documents demonstrating compliance with all relevant local and national laws and regulations.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Maintain digital or hard copies of applicable land and water use laws. Provide the audit team with a summary of applicable laws and permit requirements along with contact details for relevant staff.</p> <p>b. Maintain original (or certified copies of) lease agreements, land titles and concession permit(s) on file as applicable.</p> <p>c. Keep records of inspections for compliance with national and local laws and regulations (only if such inspections are legally required in the country of operation).</p> <p>d. Others, please describe</p>	<p>(a) copies of the following 5 applicable laws and regulations relating to fish farming in Denmark are available: building/construction regulations, environmental protection law, guidance on the approval for saltwater fish farming, Discharge Law, Feed Law.</p> <p>Description in Company Handbook V1.1, Chapter Myndigheder, dd 2-9-2018. Water intake is covered in Environmental protection law and in the guidance on the approval of saltwater fish farming.</p> <p>Maximum levels for N and P in effluent water are 44 and 4.8 Kg per MT fish produced and BOD limit is 175. The limits in the EIA for Sashimi Royal are set at 20, 2.4 and 6 respectively.</p> <p>No requirements from the government regarding Total N and P released, but annual limits are set by the EIA for Sashimi Royal at 48 and 5.5 Kg/MT produced fish.</p> <p>Production data of 2017 used, records of 2018 available.</p> <p>The land is hired from the Harbour of Hanstholm. Lease agreement from Maximum (CVR 1282 2404), dd 20-11-2015. Sashimi Royal was established dd 27-8-2014 and taken up in this agreement as party. Land area is 30.200m2.</p> <p>The building is owned. Seen construction contract with Gråkjær, dd 18-2-2016 (start digging). Environmental approval dd 27-8-2014 and authorisation for aquaculture farming from Miljø Fødevareministeriet (Food Administration Agency), with Sashimi Royal A/S autorisationsnummer 36950609125276, dd 14-8-2017</p> <p>Company is reporting annually to 3 different authorities; Municipality dd 15-2-2018 Environmental dd 25-4-2018 Animal/Fish production/Fisheries agency, dd 31-12-2017 Production of <i>Seriola lalandi</i> is mentioned.</p> <p>Seen Veterinarian Control Report with CVR 36950609 (business) and CHR 125276 (keeping animals), dd 8-8-2017. Incl. animal husbandry, registration and dead fish removal, fingerlings, hygiene practices, biosecurity measures, monitoring and reporting. Miljø Fødevareministeriet (Food Administration Agency) visit dd 8-8-2017. Aquaculture/Fish production, Authorisation number 36950609125276.</p> <p>See also 1.1.4. The environmental report includes total N and total P (calculated based on feed records) and measured Total N and P. N and P per production is within the limits.</p> <p>Total N and P in 2017 was above the limits set by the Environmental approval.</p>	<p>Minor</p> <p>N, P and BOD limits set by EIA are not met (see 1.1.4).</p> <p>No documented evidence on compliance to ICES for introduction and culture of non-native species by Maximus (sister company) in 2015.</p>	
1.1.2	<p>Indicator: Documents demonstrating compliance with all tax laws.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Provide a certificate of tax clearance or tax law conformity from local Revenue authority;</p> <p>OR</p> <p>Maintain records of tax payments to appropriate authorities (e.g. land use tax, water use tax, revenue tax). Note that CABs will not disclose confidential tax information unless client is required to or chooses to make it public.</p> <p>b. Demonstrate that the farm ensures compliance with tax laws appropriate to its size and scale. Large-scale producers should for instance use the services of a qualified and knowledgeable tax professional such as a chartered Public Accountant to manage overall compliance with taxation law. Small-scale producers should show tax receipts.</p> <p>c. If tax is paid by a parent company legally then the farm should present information to this effect.</p> <p>d. Others, please describe</p>	<p>A. The company makes use of an approved independent financial auditor (BDO). Seen approval report for the calendar year 2017. Report includes check of income statement, numbers are checked according to Danish laws and rules by tax authorities and Danish accounting standards, signed by the Statsautoriseret, dd 9-5-2018.</p> <p>Sales just started in 2018, so no tax payment yet, but return, seen statement dd 28-8-2018 from tax authorities (Skatte Styrelsen).</p> <p>B. Seen monthly VAT declaration report, incl. sales local and abroad. Clearly explained by the accountant. The VAT authorities may call if they have additional questions and that happened twice in 2018.</p>	<p>Compliant</p>	
1.1.3	<p>Indicator: Documents demonstrating compliance with all labor laws and regulations.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Demonstrate how the farm conforms with the requirements of national and regional/local labor codes and employment law.</p> <p>b. Keep records of farm inspections for compliance with national labor laws and codes (only if such inspections are legally required in the country of operation).</p> <p>c. Others, please describe</p>	<p>A. The farm conforms with national labor/employment laws. Handbook for employees (Medarbejderhåndbog Maximus A/S & Sashimi Royal A/S, 16 pages), dd 24-8-2018 describes rules and regulations and include health & safety, anti-discrimination, harassment, child labour and young workers. Employees have access through network. E-mail was sent to employees by Lenette to all 18 (Maximus and Sashimi Royal) employees dd 30-8-2018. At Sashimi there are 12 employees in total. B. There were no inspection/visit of labor agency (yet).</p>	<p>Compliant</p>	
1.1.4	<p>Indicator: Documents demonstrating compliance with regulations and permits concerning water quality impacts.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Obtain permits for discharge water where applicable.</p> <p>b. Maintain records of monitoring and compliance with discharge laws and/or regulations as required.</p> <p>c. Maintain records of monitoring and compliance with waste and pollution laws/regulations.</p> <p>d. Others, please describe</p>	<p>Annual abstraction is limits for freshwater is 110,000m3. In the first half of 2018, 49.541m3 is used and in compliance. Discharge is in the municipality waste water collection.</p> <p>Effluent Limit set by the Government: (No limits on max release on total values) max 44kg N/MT produced fish max 4.8kg P/MT produced fish max 175 kg BOD /prod. ton</p> <p>Limits set for Sashimi Royal, based on EIA, dd 27-8-2014 max 48MT Total N in effluent water max 5,5MT Total P in effluent water max 20kg N/MT produced fish max 2.4kg P/MT produced fish max 6 kg BOD /prod. ton</p> <p>Lab Measurement in 2017 of Total N, Total P and BOD are within the limits: 2.3MT Total N in effluent water 0,24MT Total P in effluent water BOD5 0,81</p> <p>Measured & calculated, based on biomass produced: 34kg N/MT produced fish 3.4kg P/MT produced fish 12 kg BOD /prod. ton</p> <p>In these records, the governmental guidelines are fulfilled, but not the limits set by the EIA for Sashimi Royal.</p> <p>Seen communication with municipality (Thisted Kommune) dd 23-8-2018 that it is approved according to NOVANA monitoring program (governmental standard on monitoring).</p> <p>Monitoring lab Hølvang Laborator. DANAK Accredited, dd 17-10-2017. N and P calculations based on Feed input and based on effluent sampling. Waste and pollution limits are taken up in the EIA.</p>	<p>Minor</p> <p>The max. limits of N, P and BOD5 set by the EIA are exceeded for 2017. An approval letter from the local Kommune is available, therefore set as minor. There is no explanation given in the approval letter.</p> <p>Monitoring and records available for 2018, but no results of calculations available.</p> <p>If more information is available DNV GL may consider to ask for a variance request at ASC, if required.</p> <p>Limits for max. intake water (fresh- and seawater) to be explained, incl. calculations.</p>	
PRINCIPLE 2: CONSERVE NATURAL HABITAT, LOCAL BIODIVERSITY AND ECOSYSTEM STRUCTURE AND FUNCTION					
Criterion 2.1 Benthic biodiversity and benthic effects					

2.1.1	<p>Indicator: TOC, sulphide, or redox levels in sediment immediately outside of Allowable Zone Effect (AZE)(1) attributable to farm operations as evidenced by control.</p> <p>Requirement: No significant change in TOC, sulphide, or redox levels in sediment at the edge of the AZE in comparison to the control site.</p> <p>Applicability: All farms except as noted in footnote 1. For farms that have yet to define an AZE, within 3 years from the publication of the Seriola and Cobia standards.</p>	<p>a. Prepare a map of the farm showing boundary of AZE and GPS locations of all sediment-sampling stations. If the farm uses a site-specific AZE, provide justification for its selection to the CAB.</p> <p>OR (for farms that have yet to define an AZE and for up to 3 years from the publication of the Seriola and Cobia standards):</p> <p>Prepare a map of the farm showing GPS locations of all sediment-sampling stations.</p> <p>b. If benthos throughout the full AZE is hard bottom, provide evidence to the CAB and request an exemption from 2.1.1.a.g, and 2.1.2.</p> <p>c. Inform the CAB of which indicator the farm has selected for evaluating and monitoring benthic impact.</p> <p>d. Collect sediment samples using an appropriate methodology and sampling regime, following the guidance in the Seriola and Cobia Standards (i.e. at the time of peak cage biomass and at all required stations).</p> <p>e. For option #1, measure and record redox potential (mV) in surficial sediment samples taken from immediately outside the AZE as well as at an un-impacted control site far removed from the farm using an appropriate, nationally or internationally recognized testing method.</p> <p>f. For option #2, measure and record sulphide concentration (uM) in surficial sediment samples taken from immediately outside the AZE as well as at an un-impacted control site far removed from the farm using an appropriate, nationally or internationally recognized testing method.</p> <p>g. For option #3, measure and record Total Organic Carbon (e.g. % by weight) in surficial sediment samples taken from immediately outside the AZE as well as at an un-impacted control site far removed from the farm using an appropriate, nationally or internationally recognized testing method.</p> <p>h. Others, please describe</p>	<p>N/A. A site-specific AZE refers to marine cage systems. Sashimi Royal is producing in indoor, closed RAS with minimum effluent discharge into the natural environment. Licence is based on RAS production.</p>	N/A	<p>N/A. A site-specific AZE refers to marine cage systems. Sashimi Royal is producing in indoor, closed RAS with minimum effluent discharge into the natural environment. Licences are based on RAS production.</p>
2.1.2	<p>Indicator: Abundance of harmful (invasive or noxious) macrofauna immediately outside of AZE attributable to farm operations as evidenced by control.</p> <p>Requirement: No significant change in harmful macrofauna at the edge of the AZE in comparison to the control site.</p> <p>Applicability: All farms except as noted in footnote 1. For farms that have yet to define an AZE, within 3 years from the publication of the Seriola and Cobia standards.</p>	<p>a. Prepare a map of the farm showing boundary of AZE and GPS locations of all sediment-sampling stations. If the farm uses a site-specific AZE, provide justification for its selection to the CAB.</p> <p>OR (for farms that have yet to define an AZE and for up to 3 years from the publication of the Seriola and Cobia standards):</p> <p>Prepare a map of the farm showing GPS locations of all sediment-sampling stations.</p> <p>b. If benthos throughout the full AZE is hard bottom, provide evidence to the CAB and request an exemption from 2.1.1.a.g, and 2.1.2.</p> <p>c. Inform the CAB of which indicator the farm has selected for evaluating and monitoring benthic impact.</p> <p>d. Analyze epifaunal and infaunal components of sediment samples including identification to species level and enumeration of all species, for all sampling stations.</p> <p>e. Estimate proportions of all faunal species present in sediments immediately outside the AZE and at an un-impacted control site far removed from the farm and test for significance in difference (95% C.I.) in presence of opportunistic species and species that are considered to be indicators of benthic enrichment or harm.</p> <p>f. Others, please describe</p>	<p>N/A. Production in land-based, indoor, closed RAS.</p>	N/A	<p>Production in land-based, indoor, closed RAS.</p>
Criterion 2.2 Water quality in and near the site of operation					
2.2.1	<p>Indicator: Turbidity levels in the water column inside and outside AZE.</p> <p>Requirement: No significant change in turbidity levels in the water column at the edge of the AZE in comparison to the control site.</p> <p>Applicability: All.</p>	<p>a. Devise appropriate and detailed turbidity monitoring procedure with detailed maps of sampling points and detailed methodology.</p> <p>b. Measure and record turbidity initially on a monthly basis at the edge of the Allowable Zone of Effect and at an un-impacted control site far removed from the farm.</p> <p>c. Conduct analysis of turbidity data for statistically significant difference (95% C.I.) between turbidity at the edge of the AZE and at one or more control sites far removed from any potential farm influence.</p> <p>d. Provide results of statistical analysis for initial 12 month turbidity monitoring.</p> <p>e. Implement annual turbidity monitoring procedure.</p> <p>f. Others, please describe</p>	<p>N/A. Production in land-based, indoor, closed RAS.</p>	N/A	<p>Production in land-based, indoor, closed RAS.</p>
2.2.2	<p>Indicator: Ammonia levels in the water column inside and outside AZE.</p> <p>Requirement: No significant change in ammonia levels in the water column at the edge of the AZE in comparison to the control site.</p> <p>Applicability: All.</p>	<p>a. Devise appropriate and detailed ammonia monitoring procedure with detailed maps of sampling points and methodology. The monitoring action must be appropriate for size and scale of the impact and if the farm can prove low impact over a year then don't have to monitor so frequently afterwards.</p> <p>b. Measure and record ammonia initially on a monthly basis at the edge of the Allowable Zone of Effect and at an un-impacted reference (control) site far removed from the influence of a farm.</p> <p>c. Conduct analysis of ammonia data for statistically significant difference (95% C.I.) between ammonia levels at the edge of the AZE and at one or more control sites far removed from any potential farm influence.</p> <p>d. Provide results of statistical analysis for initial 12 month ammonia monitoring.</p> <p>e. Implement annual ammonia monitoring procedure.</p> <p>f. Others, please describe</p>	<p>N/A. Production in land-based, indoor, closed RAS.</p>	N/A	<p>Production in land-based, indoor, closed RAS.</p>
Criterion 2.3 Interaction with critical or sensitive habitats and species					
2.3.1	<p>Indicator: Evidence of an assessment of the farm's potential impacts on biodiversity and nearby ecosystems that contains at a minimum: a) identification of proximity to critical, sensitive or protected habitats and species, b) description of the potential impacts the farm might have on biodiversity, with a focus on affected habitats or species, and c) a description of strategies and current and future programs underway to eliminate or minimize any identified impacts the farm might have.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Collect documentation that allows an interpretation of the farms location in the context of biodiversity and ecosystems that may be at risk from under assessment farm related impacts. The monitoring action must be appropriate for size and scale of the potential impact of the farm and if the farm can prove low impact over a year then don't have to monitor so frequently afterwards.</p> <p>b. Complete a detailed risk assessment for potential impacts of the farm on critical, sensitive and protected habitats and species. Demonstrate how the farm has strategies and programmes in place that are designed to minimise or eliminate negative impacts on species and habitats.</p> <p>c. Collect independent evidence that confirms the level of interaction and/or impact of the farm on critical, sensitive or protected habitats and species. Evidence can include stakeholder submission.</p> <p>d. Others, please describe</p>	<p>A. https://areainformation.miljoportal.dk (Denmark's Environmental portal) shows different types of natures around the farm. Authority portal on threatened species in the area with 2 species at 1 side and 1 species at the other side of the farm. It is not known which species it concerns. The company tried to find out, but could not get the information from the environmental portal (danmarksloeoportal) and from the National Centre for Environment and Energy (DMU) - question on email dd 9-7-2018 remains without an answer.</p> <p>Description in Company Handbook V1.1, Chapter Myndigheder, dd 2-9-2018 and in the EIA that the company (indoor RAS production) has limited impact on the environment. No additional mitigation is required. Also verified during the on-site audit (including harvest).</p> <p>http://bios.au.dk/raadgivning/natur/redlistframe/</p>	Minor	<p>Not clear which threatened species are present in the area. IUCN list is not accessed.</p> <p>The impact of the farming activities is low to negligible, therefore set as minor, however, information on species is missing/required.</p>
2.3.2	<p>Indicator: Allowance for the farm to be sited in a legally designated protected area.</p> <p>Requirement: None (see note above).</p> <p>Applicability: All.</p>	<p>a. Provide a map showing the location of the farm relative to nearby legally protected areas (see footnote 4).</p> <p>b. If the farm is sited in a legally protected area, review the scope of applicability of indicator 2.3.2a. (see instructions above) to determine if the farm is allowed an exception to the requirements. If yes, inform the CAB and provide supporting evidence.</p> <p>c. Demonstrate that the farm does not conflict with or interfere with the operation or integrity of designated parks, limited use protected areas or national preservation areas.</p> <p>d. Others, please describe</p>	<p>A. Map with Natura 2000 area shows that the farm is located adjacent to that. B. The farm is located next to a Natura 2000 area with protected nature. There is a Natural Park 2,1 km from the farm. VVM/EIA screening (dd 27-8-2014) states that there are no additional measures required to mitigate the farm's impact on it.</p> <p>According to a local website, it is located in protected environment https://areainformation.miljoportal.dk (Denmark's Environmental portal). Information is not clear and contradictory.</p>	Major	<p>Different maps show different results regarding PA's in the region. It is not clear what the rules of the protected area are and definition of building in the area (licences etc.). It is not clear from EIA.</p> <p>The farm is located near other farms and plants and</p>
Criterion 2.4 Interaction with wildlife, including predators					
2.4.1	<p>Indicator: Acoustic deterrent devices allowed.</p> <p>Requirement: None.</p> <p>Applicability: All.</p>	<p>a. Prepare a written statement affirming that the farm's management is committed to not using acoustic deterrent devices (ADDs) or acoustic harassment devices (AHDs) for control of marine pests and/or predators.</p> <p>b. Compile documentary evidence to show that no ADDs or AHDs are used on the farm (e.g. predator and pest control procedure and evidence of implementation).</p> <p>d. Others, please describe</p>	<p>A. Control of marine pests and predators is not needed in this land-based, indoor production system. Seen company's declaration dd 16-8-2018 that no ADD nor AHD are used. It is taken up in the Company's Handbook (dd 2-9-2018) that these deterrent devices are not necessary and, thus, not used. B. There is a contract with the pest control agency (Ewers), dd 4-10-2017. It includes 6 annual inspections on 22 traps outside the facilities. Seen report of last visit dd 25-6-2018 with results (no rats and mice traces 5 devices). Map with the production and water treatment facility shows location of traps. C. During the on-site audit, no such devices are found. All doors were closed during the audit.</p>	Compliant	
2.4.2	<p>Indicator: Number of mortalities of endangered or red-listed animals in the farm lease area and adjacent areas due to farm operations or personnel or associates.</p> <p>Requirement: 0.</p> <p>Applicability: All.</p>	<p>a. Provide a list of endangered and red-listed animals occurring in the farm lease area and surrounding areas.</p> <p>b. Produce a documented record of the farm's impact on biodiversity and nearby ecosystems. Detail species/habitats, spatial/temporal aspects, type of interaction and outcome.</p> <p>c. Establish list of predators and pests requiring control. Identify clearly the permitted mitigation/control procedures and records that must be kept.</p> <p>d. Record all mortalities, species and time of the event.</p>	<p>A. List of endangered and red-listed animals occurring in the farm area and surrounding areas.</p> <p>B. Impact level very low with indoor production. Staff is aware.</p> <p>The company has a list for records of dead animals, which is empty dd 16-8-2018. Animals are never killed is taken up in the company's Handbook, dd 2-9-2018.</p>	Minor	<p>No list of mortalities of endangered and red-listed species available at the farm (See 2.3.1).</p>

		e. Others, please describe			
2.4.3	Indicator: Evidence that the following steps were taken prior to lethal action against a (non-endangered or non-listed) predator: 1. All other avenues were pursued prior to using lethal action. Requirement: None. Applicability: All.	a. Provide a company document that sets out the procedure that must be followed prior to lethal resolution of a predator. b. Maintain a log of predator control events that allows for verification of adherence to company procedures regarding predator control.	N/A. No lethal action.	N/A	No lethal actions against predators.
2.4.4	Indicator: Evidence that information about any lethal incident on the farm has been: 1. Reported to the appropriate government oversight agency. 2. Made easily publicly accessible. Requirement: None. Applicability: All.	d. Others, please describe a. Demonstrate that details on lethal predator management events have been transmitted to appropriate/most relevant government oversight agency. b. Demonstrate that details on lethal predator management events are made available to the public. c. Others, please describe	N/A. No lethal predator management.	N/A	No lethal incidents.
2.4.5	Indicator: Maximum number of lethal incidents on farm over the prior two years. Requirement: For birds: 4 lethal incidents. For sharks: 2 lethal incidents. For marine mammals: 1 lethal incident. Applicability: All.	a. Maintain log of lethal incidents for a minimum of two years. For first audit, > 6 months of data are required. b. Calculate the total number of lethal incidents involving different species or groups of species (e.g. sharks, birds, marine mammals) during the previous two-year period. c. If the farm can demonstrate valid publicly available research that whatever is killed is hindering the recovery of any population then it may be exempt from the set requirement number in this indicator. d. Others, please describe	Record form is present (empty - no incidents with predators).	Compliant	
2.4.6	Indicator: In the event of any lethal incident, evidence that an assessment of the probability of lethal incident(s) has been undertaken and demonstration of concrete steps taken by the farm to reduce the risk of future incidences. Requirement: None. Applicability: All.	a. Carry out documented review of lethal incidents and revise risk assessment and procedures (see 2.3.1) if necessary / as appropriate. b. Demonstrate through revision of procedures that management of predators is continually being reviewed with a view to eliminating the need for lethal management. c. Others, please describe	The risk is very low in indoor, closed fish production. Described in the Company's Document. Risk is very low to negligible.	N/A	No lethal incidents.
PRINCIPLE 3: PROTECT THE HEALTH AND GENETIC INTEGRITY OF WILD POPULATIONS					
<i>Criterion 3.1 Culture of non-native species</i>					
3.1.1	Indicator: Culture of a non-native species. Requirement: None, unless commercial farming of the species already occurs in the region at time of the first publication of the SCAD standards, or a closed land-based production system with minimal risk of escapes and/or pest and pathogen transfer to wild populations is used. Applicability: All.	a. Confirm to the CAB that the farm produces only native species OR. b. If non-native species, provide verifiable evidence that the species was being legally cultured commercially in the country and/or region/state prior to the publishing of the seriola and cobia standard in 2015 OR c. If the farm cannot provide evidence for 3.1.1b, provide documented evidence that the production system is closed to the natural environment and for each of the following: 1) non-native species are separated from wild fish by effective physical barriers that are in place and well maintained; 2) barriers ensure there are no escapes of reared fish specimens that might survive and subsequently reproduce; and 3) barriers ensure there are no escapes of biological material that might survive and subsequently reproduce (e.g. UV or other effective treatment) by treating effluent water prior to it exiting the system to the natural environment. d. Others, please describe	A. Seriola lalandi is non-native in Denmark. Authorisation for farming Seriola lalandi in seawater by Sashimi Royal dd 14-8-2017. CVR 36950609 (business) and CHR 125276 (animals/aquaculture). B. This is the first commercial Seriola lalandi farm in Denmark. Fish came in dd 28-6-2017 at Sashimi Royal. The first fish came into Denmark (Maximus S/A - sister company), dd 22-2-2015. See import documents, Trading Certificate from Netherlands and concerned broodstock fish for aquaculture. No info on ICES - See 1.1.1. - Seriola lalandi is separated from wild fish by effective physical barriers that are in place and well maintained - barriers ensure there are no escapes of reared fish specimens that might survive and subsequently reproduce - barriers ensure there are no escapes of biological material that might survive and subsequently reproduce (UV-treatment of effluent water before it is released to the municipal effluent water system that end into the harbour in the Skagerak)	Compliant	
<i>Criterion 3.2 Introduction of transgenic species</i>					
3.2.1	Indicator: Culture of transgenic fish by the farm. Requirement: None. Applicability: All.	a. Prepare a declaration stating that the farm does not use transgenic stock. b. Maintain records for the origin of all cultured stocks including stocking date, supplier details, and contact person(s) for stock purchases. c. Ensure stock purchase/origin documentation clearly identifies genetic status and whether stock is transgenic or not. d. Others, please describe	A. Company declaration stating that the farm does not use transgenic stock, signed by CEO, dd 17-8-2018. B. Seen transportation documents for broodstock from The Netherlands from 2015. Broodstock purchase/origin documentation does not clearly identify whether stock is transgenic or not. There is no suspect.	Minor	Broodstock purchase/origin documentation does not clearly identify whether stock is transgenic or not. There is no suspect, therefore classified as minor.
<i>Criterion 3.3 Escapes</i>					
3.3.1	Indicator: For all fish, the operation must have an established plan related to escape management, and adhere to rigorous maintenance procedures and frequent net inspections. Requirement: Yes. Applicability: All.	a. Prepare a Stock Escape Prevention and Management Plan that includes a detailed farm operations risk assessment and submit it to the CAB prior to the first audit. The plan should explicitly detail what maintenance procedures are critical and important in the context of avoiding escapes, including but not limited to farm equipment maintenance and frequency of net inspections. b. If the farm operates an open net pen system, ensure the plan (3.3.1a): -clearly identifies the important and critical issues in the context of minimizing escape events; and -sets out clear procedures for ensuring: • net strength testing; • use of appropriate net mesh size; • net traceability; • system robustness; • predator management; • record keeping; • reporting risk events (e.g. holes, infrastructure issues, handling errors); • staff training to cover all of the above areas; and • staff training on escape prevention and counting technologies. c. If the farm operates a closed system, ensure the plan (3.3.1a): -clearly identifies the important and critical issues in the context of minimizing escape events; and -sets out clear procedures for ensuring: • system robustness; • predator management; • record keeping; • reporting risk events (e.g. holes, infrastructure issues, handling errors); • staff training to cover all of the above areas; and • staff training on escape prevention and counting technologies. d. Maintain records as specified in the plan. e. Train staff on escape prevention planning and management as per the farm's plan. g. Others, please describe	A. Stock Escape Prevention and Management Plan is taken up in the Company's Handbook, dd 2-9-2018. It is described that the risks are very low to negligible. It is taken up that escapes need to be reported to the Thisted Kommune and to Danish Ministry of Environment & Food and to the Gov. Veterinarian (Thomas Clausen). It includes telephone numbers and contact persons. Page 9 HB. N/A. Production in indoor RAS. C. The farm operates in indoor, closed RAS and the highest risk is identified during transportation of fingerlings by truck. The risk of escaping from the production system is very low. Document dd 17-8-2018 and Staff is trained dd 27-8-2018. D. Record form for escapes is empty. E. Staff is trained dd 27-8-2018.	Compliant	
3.3.2	Indicator: Operations will undertake and maintain detailed records on fish escapes and counting. This will include records of breaches in nets, estimates on escapes and stocked vs. recovered fish counts. Note: farms will also include technology and methodology for undertaking fish counts. Requirement: Yes. Applicability: All.	a. Maintain detailed records for mortalities, stocking count, harvest count (recovered fish), and details of escape events and possible escapes (e.g. through holes in nets). b. Calculate the unrecorded stock escape as described in the instructions (above) for the most recent full production cycle. For first audit, farm must demonstrate understanding of calculation and the requirement to disclose unrecorded losses after harvest of the current cycle. c. Make the results from 3.3.2b available publicly. Keep records of when and where results were made public (e.g. date posted to a company website) for all production cycles. d. Others, please describe	A. Daily mortality is recorded per production unit (14) in excel per unit per day. Fish can be followed in the inner ring. B. Stocks escapes are 0. Production in indoor, closed RAS.	Compliant	
3.3.3	Indicator: For selectively bred stock or for non-selectively bred stock not from local sources or for wild fingerlings not from local sources more than 2 escape events of 30% (cumulative total fish not recovered) over 2 years. Requirement: No. Applicability: All.	a. Determine whether stocks under culture are selectively bred, non-selectively bred but not from local sources or are from wild fingerlings not collected locally. If none of these apply, requirements 3.3.3 b.-d. do not apply. b. Where appropriate, maintain monitoring records of all incidences of confirmed or suspected escapes, specifying date, cause, and estimated number of escapes. c. Where appropriate, aggregate cumulative escapes (events and numbers) of all stocks in the most recent production cycle. d. Where appropriate, maintain the monitoring records described in 3.3.3a for at least 10 years beginning with the production cycle for which farm is first applying for certification. e. Others, please describe	Stock origin from Maximus. Records of stocking new batch (fingerlings) in excel. No escapes took place.	Compliant	

3.3.4	<p>Indicator: All escape events of farmed Seriola or Cobia are reported to the pertinent regulatory agency.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Document details of reportable escape events and suspected escape events. Make available details of reportable escapes and make results from 3.3.2b available to regulatory agencies. In absence of regulatory requirement keep the data and make it available for ASC on request.</p> <p>c. Others, please describe</p>	<p>The risk of escapes is very low to negligible from land-based, indoor RAS production. It is taken up in the Company's Handbook that escapes will be reported, if may happen.</p>	Compliant	
Criterion 3.4 Collection of fingerlings					
3.4.1	<p>Indicator: Evidence that purchased or collected wild fingerlings are harvested from a source fishery with a public fishery assessment, for example FishSource or is in a credible fishery improvement process (FIP) towards an ISEAL compliant fisheries sustainability certification scheme.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Provide details of source fishery from which fingerlings are taken. Provide supporting documentation including purchase orders, invoices, delivery notes etc. that attest to the origin of wild fingerlings.</p> <p>b. Provide FishSource score (www.FishSource.com) for wild fingerling fishery or evidence of MSC certification. If FishSource score or MSC certification is not available, then proceed to 3.4.1 c</p> <p>c. Demonstrate to audit team that the wild fingerling source fishery is in a credible Fisheries Improvement Programme towards an ISEAL compliant fisheries certification scheme</p> <p>d. Others, please describe</p>	<p>N/A. No wild caught fingerlings used.</p>	N/A	No wild caught fingerlings used.
3.4.2	<p>Indicator: Traceability of wild or hatchery purchased or collected fingerlings to their source.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Provide details of hatchery or fishery from which fingerlings are obtained. Provide supporting documentation including purchase orders, transit/movement authorisations, catching vessel details, invoices, delivery notes, stocking records etc. that attest to the origin of all stock present on the farm.</p> <p>c. Others, please describe</p>	<p>Only 1 supplier of fingerlings. All fish are supplied by Maximus S/A (sister company). Batches may be mixed during production because they are size sorted (up to 5 times) during production.</p> <p>Described in the Company's Handbook, dd 2-92018 (P.15) that broodstock is imported from Netherlands in 3 batches in February, April, June 2015. Verbal information is that broodstock were obtained from a hatchery in Chile, the origin of the parents was from the wild.</p>	Compliant	
PRINCIPLE 4: USE RESOURCES IN AN ENVIRONMENTALLY EFFICIENT AND RESPONSIBLE MANNER					
Criterion 4.1 Traceability of marine raw materials in feed					
4.1.1	<p>Indicator: Evidence of traceability, demonstrated by the feed producer, of fishmeal and fish oil ingredients.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Maintain detailed records of all feed suppliers and purchases including contact information and purchase and delivery records.</p> <p>b. Inform each feed producer (and supplier) in writing of ASC requirements pertaining to production of feeds and send them a copy of the ASC Seriola and Cobia Standard.</p> <p>c. For each feed producer supplying the farm, confirm that an independent third party audit of the producer has recently been completed against an ISEAL compliant standard that includes an evaluation of feed input traceability. Obtain a copy of the most recent audit report for each feed producer.</p> <p>d. Obtain declaration from feed producers and suppliers stating that the company can assure traceability of all fishmeal and fish oil ingredients used in making seriola and cobia diets.</p> <p>f. Others, please describe</p>	<p>A. Feed is currently obtained from Skretting, Spain. Feed was formerly obtained from Biomar, Denmark. Seen report to the Government relating to type and amount of feed, dd 25-4-2018. Total 64MT used in 2017.</p> <p>At intake, samples are taken from each batch and stored. Batch numbers are recorded. OBS - Feed batch number is not recorded in the system yet.</p> <p>B. Sashimi Royal informed Biomar and Skretting about the ASC requirements on feed. Seen email communication to Biomar with last email dd 21-6-2018. Email communication with Skretting with last email dd 24-8-2018.</p> <p>C. Biomar A/S Danmark has a compliance certificate for ASC Freshwater Trout and ASC Salmon Standard, with reference to the Interim Solution, dd 16-5-2018, issued by Bureau Veritas, valid for 1 year.</p> <p>Skretting Espana SA is GlobalGAP CPM certified GGN 4052852192286 for the scope compound feed for aquaculture.</p> <p>Results of the audits are available.</p> <p>Declaration of Biomar for fish delivered to Sashimi Royal in 2017 includes fish meal, fish oil, Soya SPC (Protein Concentrate), Wheat gluten/Pas, Fish oil, Wheat, Horse beans, rapeseed oil, monocalcium phosphate.</p> <p>Declaration of Skretting for the different types of feed includes composition of each type of feed. No information on the sources of fish meal and fish oil.</p> <p>Traceability</p>	Minor	<p>No information on the sources of fish meal and fish oil from Skretting.</p> <p>Biomar ASC-Feed Compliance certificate does not include Seriola.</p> <p>Skretting and Biomar are very well acquainted with the ASC standard and provide ASC-compliant feed to other farms. Sashimi Royal has informed the feed suppliers to be compliant with the ASC standard. Therefore, this NC is set as minor, as there is no suspect of system failure and/or that certification integrity is at risk.</p>
Criterion 4.2 Efficient and optimized diets					
4.2.1	<p>Indicator:</p> <p>a) Fishmeal Forage Fish Dependency Ratio (FFDRm) and Fish Oil Forage Fish Dependency Ratio (FFDRo) for Seriola (calculated using formulae in Appendix 1). Kampachi (S. rivoliiana, S. slamerii), Hamachi (S. quinqueradiata).</p> <p>b) FFDRm and FFDRo Cobia (calculated using formulae in Appendix 1)</p> <p>Requirement:</p> <p>a) Kampachi: FFDRm ≤ 2.9/FFDRo ≤ 2.9 Hamachi: FFDRm ≤ 6.0/FFDRo ≤ 7.0 (now) FFDRm ≤ 4.8/FFDRo ≤ 5.0 (3 years) FFDRm ≤ 2.9/FFDRo ≤ 2.9 (6 years)</p> <p>b) FFDRm ≤ 6.0/FFDRo ≤ 6.0 (now) FFDRm ≤ 4.0/FFDRo ≤ 4.0 (3 years) FFDRm ≤ 2.9/FFDRo ≤ 2.9 (6 years)</p> <p>Applicability: All.</p>	<p>a. Maintain a detailed inventory of the feed used that includes information concerning:</p> <ul style="list-style-type: none"> • Quantities used of each formulation (kg); • Percentage of fishmeal and fish oil in each formulation used; • Source (fishery) of fishmeal and fish oil in each formulation used; • Percentage of fishmeal and fish oil in each formulation derived from trimmings; • Supporting documentation and signed declaration from feed supplier. <p>b. For FFDRm and FFDRo calculations, exclude fishmeal and/or oil derived from rendering of seafood by-products (e.g. the "trimmings" from a human consumption fishery as per more detailed guidance in Appendix 1.</p> <p>c. Calculate eFCR using formula in Appendix 1.</p> <p>d. Calculate FFDRm and FFDRo using the relevant formulas in Appendix 1.</p> <p>e. Others, please describe</p>	<p>A. Records are complete for Biomar, but not for Skretting (% of fish meal and fish oil in place, no information on the different sources of fish meal, species and fisheries. B. Records not complete for Skretting, which is the major feed supplier in 2017 and 2018.</p> <p>No info on trimmings/fisheries.</p> <p>Info from Skretting, the major feed supplier, is not complete.</p> <p>The eFCR is calculated for 2017. Total amount of feed/(Net biomass production (harvest + mortalities + biomass at 31-12-2017) - (fingerlings 63.9MT)/(74.75MT-6.3MT)) = 0.93 The biomass produced is calculated based on records obtained during grading plus mortalities (escapae is 0).</p> <p>FFDRm is ((34.09/63.9)*0.93)/24 = 2.1 for Biomar in 2017 FFDRo is ((5.38*100/63.92 * 0.93)/5 = 1.6 for Biomar in 2017</p>	Major	<p>Information from Skretting does not contain species and source of fish meal and fish oil. Calculation are not carried out, it can not be evaluated, therefore set as Major NC.</p>
4.2.2	<p>Indicator: Use of wet feed and moist pellets.</p> <p>Requirement: Must be sourced from the same ecosystem as the farm.</p> <p>Applicability: All.</p>	<p>a. Maintain records of wet fish and moist pellet use on the farm, where the fish content originated from and where it was caught.</p> <p>b. Others, please describe</p>	<p>N/A. Only compound feed/pellets used for grow-out production.</p>	N/A	Only compound feed/pellets used for grow-out production.
Criterion 4.3 Responsible origin of marine raw materials					
4.3.1	<p>Indicator: Timeframe for at least 90% fishmeal or fish oil used in feed to come from fisheries certified under an ISEAL member's accredited certification whose primary goal is to promote ecological sustainability.</p> <p>Requirement: Within 5 years following the date of the publication of the SCAD standards.</p> <p>Applicability: All.</p>	<p>a. Obtain documentation that indicates the relative quantities of fishmeal and fish oil used in feed manufacture that is certified under an ISEAL member's accredited certification.</p> <p>b. Prepare a letter stating the farm's intent to source feed containing fishmeal and fish oil originating from fisheries certified under an ISEAL member standard.</p> <p>c. If audit >5 years after publication of Seriola and Cobia standards, provide documentation that confirms that requirement for at least 90% fishmeal or fish oil used in feed to come from fisheries certified under an ISEAL member's accredited certification has been met.</p> <p>d. Others, please describe</p>	<p>Documentation that indicates the relative quantities of fishmeal and fish oil used in feed manufacture that is certified under an ISEAL member's accredited certification.</p> <p>No information from Skretting.</p> <p>N/A. ASC Interim Solution applies until ASC Feed Standard is available.</p>	Minor	<p>Information from Skretting, Spain, the major fish feed supplier is not complete. Set as minor, see 4.1.1.</p>
4.3.2	<p>Indicator: Prior to achieving 4.3.1, the fishmeal or fish oil used in feed must have a FishSource score of 6.0 or higher, plus (and) an 8 in the biomass category or show evidence of being engaged in a credible and time bound fisheries improvement project (FIP).</p> <p>Requirement: At least 80% of the fish meal and fish oil used in feed (excluding fishmeal and oil from byproducts) must meet this criteria.</p> <p>Applicability: All.</p>	<p>a. Obtain documentation from feed producers and/or suppliers that independently confirms the FishSource scores for at least 80% of fishmeal and fish oil used in feed manufacture. OR</p> <p>b. Where FishSource scores are not available for any particular fishmeal or fish oil ingredient/s, compile evidence that attests to the fishmeal and fish oil suppliers being engaged in a credible FIP.</p> <p>c. Others, please describe</p>	<p>No list of the fishery of origin for all fishmeal and fish oil originating from by-products and trimmings.</p> <p>Declaration from feed supplier.</p>	Minor	<p>Information from Skretting, Spain, the major fish feed supplier is not complete. Set as minor, see 4.1.1.</p>
4.3.3	<p>Indicator: Feed containing fishmeal and/or fish oil originating from by-products or trimmings from fish species which are categorized as vulnerable, endangered or critically endangered, according to the IUCN Red List of Threatened Species.</p> <p>Requirement: None.</p> <p>Applicability: All.</p>	<p>a. Compile and maintain, consistent with 4.2.1a, a list of the fishery of origin for all fishmeal and fish oil originating from by-products and trimmings.</p> <p>b. Obtain a declaration from the feed producer and/or supplier stating that no fishmeal or fish oil originating from fish species which are categorized as vulnerable, endangered or critically endangered, according to the IUCN Red List of Threatened Species is used to produce feed.</p> <p>c. If meal or oil originated from a species listed as "vulnerable" by IUCN but that species is sourced from a local stock that is not considered vulnerable, obtain documentary evidence to support a request for an exception based on regional differences in status of the relevant species/populations.</p> <p>d. Others, please describe</p>	<p>No list of the fishery of origin for all fishmeal and fish oil originating from by-products and trimmings.</p> <p>Declaration from feed supplier.</p>	Minor	<p>Information from Skretting, Spain, the major fish feed supplier is not complete. Set as minor, see 4.1.1.</p>

4.3.4	<p>Indicator: Feed ingredients which come from other fish from the same genus.</p> <p>Requirement: None.</p> <p>Applicability: All.</p>	<p>a. Obtain from feed producers and/or suppliers declarations that the fishmeal and/or fish oil does not originate from fish of the same genus as that under cultivation.</p> <p>b. Obtain documentary evidence that feed manufacturer operates procedures to ensure that no raw material in a diet originates from the same genus as the fish for which the diet is intended. This includes all fishmeal and fish oil (including bulk fish and waste/trimmings/byproduct) that may be used.</p> <p>c. Others, please describe</p>	<p>Taken up in the declaration of the feed suppliers (Biomar and Skretting)</p>	Compliant		
Criterion 4.4 Responsible origin of non-marine raw materials in feed						
4.4.1	<p>Indicator: Presence and evidence of traceability and a responsible sourcing policy for the feed manufacturer for feed ingredients which comply with internationally recognized moratoriums and local laws.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Maintain detailed records of all feed suppliers and purchases including contact information and purchase and delivery records.</p> <p>b. Inform each feed producer (and supplier) in writing of ASC requirements pertaining to traceability and responsible sourcing for feed manufacturers and/or suppliers.</p> <p>c. For each feed producer used by the farm, confirm that an independent third party audit of the producer was recently completed by a CAB against a standard that includes an evaluation of feed input traceability. Obtain a copy of the most recent audit report for each feed producer.</p> <p>d. Others, please describe</p>	<p>See 4.1.1 for A. and B.</p> <p>Declaration of Skretting: 'Do not include any soy or palm oil in the formula' but concentrated soy protein is used.</p>	Compliant		
4.4.2	<p>Indicator: Documentation of the use of transgenic plant raw material, or raw materials derived from genetically modified plants, in the feed.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Obtain from feed supplier(s) a declaration detailing the content of transgenic plant raw materials and/or raw materials derived from genetically modified plants, in feed. This requirement is just about knowing that the feed includes or does not include transgenic material and then not claim the opposite.</p> <p>b. Disclose to the buyer(s) a list of any transgenic and/or genetically modified plant raw material used in feeds and maintain documentary evidence of this disclosure. For first audits, farm records of initial disclosures shall pre-date the audit by > 6 months.</p> <p>c. Others, please describe</p>	<p>Information available from Skretting and Biomar.</p>	Compliant		
4.4.3	<p>Indicator: Percent of non-marine ingredients from sources certified by an ISEAL Member's certification scheme that addresses environmental and social sustainability.</p> <p>Requirement: 80% for soy and palm oil within 5 years from the date of the publication of the ASC Seriola and Cobia Standard.</p> <p>Applicability: All.</p>	<p>a. Obtain documentation that indicates the relative quantities of non-marine ingredients used in feed manufacture that is certified under an ISEAL member's accredited certification.</p> <p>b. For non-conforming farms, prepare a declaration stating the farm's intent to source feed that contains non-marine ingredients certified under an ISEAL member standard that addresses both environmental and social sustainability.</p> <p>c. If audit >5 years after publication of Seriola and Cobia standards, provide documentation that confirms that requirement for at least 80% of non-marine ingredients used in feed comes from ISEAL member certifications that address both environmental and social sustainability.</p> <p>d. Others, please describe</p>		Minor	<p>Information from Skretting, Spain, the major fish feed supplier, is not complete. Statement that 'no soy and palm oil are used', but ... declared in ingredient list of feed.</p> <p>Raised as minor - see 4.1.1.</p>	
PRINCIPLE 5: PROACTIVELY MAINTAIN THE HEALTH AND WELFARE OF CULTURED FISH AND MINIMIZE THE RISK OF DISEASE TRANSMISSION						
Criterion 5.1 Transfer of pests or parasites to wild stocks						
5.1.1	<p>Indicator: Commitment to participate in an Area-Based Management (ABM) scheme.</p> <p>Requirement: The farm participates in an ABM, where it exits, for managing disease and resistance to treatments.</p> <p>Applicability: All.</p>	<p>a. Keep record of farm's participation in an ABM scheme and communication around scheme availability.</p> <p>b. Submit to the CAB a description of how the ABM coordinates management of disease and resistance to treatments, for instance - coordination of stocking; - following - therapeutic treatments; and - information sharing.</p> <p>c. Provide the CAB access to documentation which is sufficient for the auditor to evaluate the ABM's compliance with definition of area, minimum % participation in the scheme, components, and coordination requirements.</p> <p>d. Others, please describe</p>	<p>N/A. No ABM.</p>	N/A	No ABM.	
5.1.2	<p>Indicator: A demonstrated commitment to collaborate with NGOs, academics and governments on areas of mutually agreed research to measure possible impacts of pests or parasites on wild stocks.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Retain records to show how the farm and/or its operating company has communicated with external groups (NGOs, academics, governments) to agree on and collaborate towards areas of research to measure impacts on wild stocks, including records of requests for research support and collaboration and responses to those requests.</p> <p>b. Provide non-financial support to research activities in 5.1.2a by either: - providing researchers with access to farm-level data; - granting researchers direct access to farm sites; or - facilitating research activities in some equivalent way.</p> <p>c. When the farm and/or its operating company denies a request to collaborate on a research project, ensure that there is a written justification for rejecting the proposal.</p> <p>d. Maintain records from research collaborations (e.g. communications with researchers) to show that the farm has supported the research activities identified in 5.1.2a</p> <p>e. Others, please describe</p>	<p>Commitment to improve water quality and continuous improvement taken up in the Company Handbook.</p> <p>Sashimi Royal is collaborating with DTU Denmark (Technical University) regarding improving water quality in production and effluent water.</p> <p>The farm effluent water is mixed up with water from the community waste water treatment plant.</p> <p>Project called Bonus Cleansea as part of EU Bonus call 2015: Blue Baltic. (There is no further research at the harbour.)</p> <p>(Collaborating with Krüger on biofilter effectiveness, and with BactiQuant on microbial load in the water, with Niras on algae content in the production water.)</p>	Compliant		
5.1.3	<p>Indicator: On-farm testing for ectoparasites, with test results made easily publicly available.</p> <p>Requirement: Yes, with results made easily publicly available within seven days of testing.</p> <p>Applicability: All.</p>	<p>a. Prepare an annual schedule for ectoparasite testing that identifies timeframes of routine testing frequency.</p> <p>b. Maintain records of results of on-farm testing for ectoparasites. If farm deviates from schedule due to weather maintain documentation of event and rationale.</p> <p>c. Document the methodology used for testing ectoparasites ('Testing' includes both counting and identifying ectoparasites). The method must follow national or international norms, follows accepted minimum sample size, use random sampling, and record the species and life stage of the ectoparasite. If farm uses a closed production system and would like to use an alternate method (e.g. video), farm shall provide the CAB with details on the method and efficacy of the method.</p> <p>d. Make the testing results from easily publicly available (e.g. posted to the company's website) within seven days of testing. If requested, provide stakeholders access to hardcopies of test results.</p> <p>e. Keep records of when and where test results were made public.</p> <p>f. Submit test results to ASC at least once per year.</p> <p>g. Others, please describe</p>	<p>Schedule for ectoparasite testing by the farm veterinarian Thomas Clausen. The vet is coming 1-2 monthly.</p> <p>Routinely on-farm monitoring is carried out monthly. Seen dissection procedure and checklist and records dd 29-8-2018 with no gill/skin parasites. Report of Thomas Clausen, visit report dd 9-8-2018 with no ciliates or parasites found.</p> <p>Land-based, indoor RAS, water intake from the sea through 90cm of sand (natural) and UV-treated before use in the production tanks. Effluent water is UV treated as well before it is released into the municipality waste water collection and directly into the harbour.</p>	N/A	Land-based production.	
Criterion 5.2 Chemicals and treatments						
5.2.1	<p>Indicator: Use of therapeutic treatments that are banned by law under the local jurisdiction or listed as critically important for human medicine by the World Health Organization</p> <p>Requirement: Not permitted.</p> <p>Applicability: All.</p>	<p>a. Maintain a current version of the WHO list of antimicrobials critically and highly important for human health.</p> <p>b. Maintain a list of therapeutants the use of which in finfish aquaculture are banned by law and also maintain a list of therapeutants the use of which in finfish aquaculture are permitted by law.</p> <p>c. If the farm has used antibiotics listed as critically important to human health and/or has used therapeutants that are banned in finfish culture to treat any fish during the current production cycle, inform the CAB prior to scheduling audit.</p> <p>d. If yes to 5.2.1c, request an exemption to the requirement of 5.2.1 from the CAB in order to certify only that portion of production that complies with the indicator. Prior to the audit, provide the CAB with records sufficient to establish details of treatment, which holding facilities were treated, and how the farm will ensure full traceability and separation of treated fish through and post-harvest.</p> <p>e. Others, please describe</p>	<p>A. Link to WHO list of antimicrobials critically and highly important for human health is available. List of forbidden treatments in Denmark by EU regulation is taken up in the FHP. There is no list of therapeutants the use of which in finfish aquaculture are permitted by law. No antibiotics used.</p>	Compliant		
5.2.2	<p>Indicator: Prophylactic use of chemical antimicrobial treatments (excluding prebiotics or vaccinations).</p> <p>Requirement: Not permitted.</p> <p>Applicability: All.</p>	<p>a. Maintain records for all purchases of chemical antimicrobials (invoices, prescriptions) for the current and prior production cycles.</p> <p>b. Maintain a detailed log of all medication-related events (see also 5.2.1a and 5.2.3).</p> <p>c. Calculate the total amount (g) and treatments (#) of chemical antimicrobials used during the current and preceding production cycles.</p> <p>d. Others, please describe</p>	<p>Complete list of chemicals used contains 6 products; none of these are used to treat the fish, but for water treatment. Prophylactic use of chemical antimicrobial treatments is not allowed in Denmark and taken up in the Helseplan (FHP). No medications used until now.</p>	Compliant		
5.2.3	<p>Indicator: Farms have a comprehensive fish health management plan approved by the farm's designated veterinarian that includes either a) vaccination against diseases that present a risk in the region and for which an effective and commercially viable vaccine exists, or b) veterinarian-approved alternative fish health management strategies.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Prepare a fish health management plan that incorporates components related to identification and monitoring of fish disease and parasites. This plan may be part of a more comprehensive farm planning document.</p> <p>b. Ensure that documentation is available to verify that the fish health management plan includes mandatory procedures for either: i) vaccination against diseases that present a risk in the region and for which an effective and commercially viable vaccine exists; OR ii) veterinarian-approved alternative fish health management strategies.</p> <p>c. Ensure that the farm's current fish health management plan was reviewed and approved by the farm's designated veterinarian.</p> <p>d. Demonstrate that the farm complies with World Organisation for Animal Health (OIE) regulations relating to transfer of fish/eggs/fingerlings, Specific pathogen free status and quarantine status (see http://www.oie.int/international-standard-setting/aquatic-code/access-online/).</p> <p>e. Others, please describe</p>	<p>Documented Fish Health Plan, signed by the veterinarian Thomas Clausen, dd 30-8-2018. Vaccination is not applied at the moment and taken up as such in the VHP. A link to the OIE guidelines is available. Basic hygiene and biosecurity measures are described.</p>	Compliant		
5.2.4	<p>Indicator: Allowable farm level anti-parasiticide treatment not including freshwater, formaldehyde or hydrogen peroxide.</p>	<p>a. Identify permitted anti-parasiticides that may be applied to stock during the farming procedure in the fish health management plan. Provide Material Data Safety Sheets for all anti-parasiticide products that are used. Only freshwater, formaldehyde and hydrogen peroxide is allowed and others are banned.</p>	<p>At this moment no anti-parasite treatment is used. It is taken up in the FHP that if this may become important, it will always be in consultation with the veterinarian.</p>	Compliant		

	<p>Requirement: None.</p> <p>Applicability: All.</p>	<p>b. Make available records relating to all chemical, veterinary and therapeutant suppliers. Include invoices, laboratory testing results as well as prescriptions and treatment records.</p> <p>c. Others, please describe</p>			
Criterion 5.3 Environmental welfare					
5.3.1	<p>Indicator: Weekly average percent dissolved oxygen (DO) saturation on farm, calculated in the following methodology.</p> <p>Requirement: >70% saturation.</p> <p>Applicability: All farms. Exception can be granted to farms that do not conform to >70% saturation where it can be demonstrated that farm site DO readings are consistent with those of a reference site.</p>	<p>a. Monitor and record on-farm percent saturation of DO at a minimum of twice daily using a calibrated oxygen meter or equivalent method. For first audits, farm records must cover 26 months. The ASC recognizes that it is not always safe to carry out weekly monitoring and there can be pragmatic and sensible solutions to testing. Under no circumstances should worker safety be compromised if, for example, there is bad weather.</p> <p>b. Provide a written justification for any missed samples or deviations in sampling time.</p> <p>c. Calculate weekly average percent saturation based on data.</p> <p>d. If any weekly average DO values are < 70%, or approaching that level, monitor and record DO at a reference site and compare to on-farm levels (see instructions).</p> <p>e. Arrange for auditor to witness DO monitoring and calibration while on site.</p> <p>f. Others, please describe</p>	<p>There are 3 different oxygen supply systems: Venturi system at the intake water, in each fish tank oxygen and an emergency system at the bottom of the culture tanks. Avg DO is 95%.</p> <p>Probes are available in (at least) each tank and DO is measured continuously and recorded. Additional daily and weekly measurements are carried out. Limits are set between 75-130%. See DO levels of last month, fluctuating, but within the limits.</p> <p>Scheme and procedure for DO calibration in place.</p>	Compliant	
5.3.2	<p>Indicator: maximum percentage or weekly samples from 5.3.1 that fall under 70%.</p> <p>Requirement: <5%.</p> <p>Applicability: All farms. Exception can be granted to</p>	<p>a. Calculate the percentage of on-farm samples taken that are less than 70% saturation DO.</p> <p>b. Inform CAB if the percentage of on-farm DO measurements that are less than 70% DO is greater than 5%. Provide data for previous 6 months.</p> <p>c. Others, please describe</p>	<p>DO below 70% is very rare. Not seen such a measurement in the last months (lowest was 78% dd 25-7-2018).</p>	Compliant	
PRINCIPLE 6: OPERATE FARMS WITH RESPONSIBLE LABOR PRACTICES					
Criterion 6.1 Child labor and young workers					
6.1.1	<p>Indicator: Number of incidences of child labor.</p> <p>Requirement: None.</p> <p>Applicability: All.</p>	<p>a. In most countries, the law states that minimum age for employment is 15 years. There are two possible exceptions:</p> <ul style="list-style-type: none"> • in developing countries where the legal minimum age may be set to 14 years ; or • in countries where the legal minimum age is set higher than 15 years, in which case the legal minimum age of the country is followed. <p>If the farm operates in a country where the legal minimum ages is not 15, then the employer shall maintain documentation attesting to this fact.</p> <p>b. Minimum age of permanent workers is 15 or older (except in countries as noted at 6.1.1a).</p> <p>c. Employer must maintain personnel records that are sufficient to demonstrate conformity with requirements.</p> <p>d. Others, please describe</p>	<p>Youngest worker is 23 years old through outsourcing company (Team Vikarer).</p> <p>Employee handbook includes statement on child labour.</p>	Compliant	
6.1.2	<p>Indicator: Percentage of young workers that are protected</p> <p>Requirement: 100%.</p> <p>Applicability: All.</p>	<p>a. Young workers are appropriately identified in company policies & training programs, and job descriptions are available for all young workers at the site.</p> <p>b. All young workers (from age 15 to less than 18) are identified and their ages are confirmed with copies of IDs.</p> <p>c. Daily records of working hours (i.e. timesheets) are available for all young workers.</p> <p>d. For young workers, the combined daily transportation time and school time and work time does not exceed 10 hours.</p> <p>e. Young workers are not exposed to hazards and do not perform hazardous work. Work on floating cages in poor weather conditions shall be considered hazardous.</p> <p>f. Others, please describe</p>	<p>No young workers. In Denmark minimum age is 15 years. Special rules for young workers described in the Employee Handbook (no heavy lifting, no chemical handling etc.).</p>	Compliant	
Criterion 6.2 Forced, bonded or compulsory labor					
6.2.1	<p>Indicator: number of incidents where employees withhold any part of employee salary, property, or benefits upon termination of employment.</p> <p>Requirement: None.</p> <p>Applicability: All.</p>	<p>a. It must be demonstrated that workers are free to leave the employment and workplace and that they are not subject to withholding of payments or denial of any other benefits of employment, or under any other obligations to the employer other than those are legal and contractual in nature.</p> <p>b. Conformity will be verified further through discussion with selected staff members during the on-site audit.</p> <p>c. Others, please describe</p>	<p>Workers are free to leave the workplace and no withholding of payments, as verified during interviews.</p>	Compliant	
6.2.2	<p>Indicator: number of incidents where employees are required to surrender original identity documents upon commencing employment (except as required for processing of legal documentation).</p> <p>Requirement: None.</p>	<p>a. It must be demonstrated that workers are not required to surrender original identity documents except for when and for as long as it is necessary for the purpose of processing legal documentation.</p> <p>b. Conformity will be verified further through discussion with selected staff members during the on-site audit.</p> <p>c. Others, please describe</p>	<p>Original identity documents are kept by the employees.</p>	Compliant	
Criterion 6.3 Discrimination in the work environment					
6.3.1	<p>Indicator: Evidence of comprehensive and pro-active anti-discrimination policies, procedures and practices including, but not limited to, discrimination in the workplace and equal access to all jobs in relation to gender, age, race, religion, creed, caste, or sexual orientation.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Demonstrate that employer has a written pro-active anti-discrimination policy in place, stating the company does not engage in or support discrimination in hiring, remuneration, access to training, promotion, termination or retirement based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, age or any other condition that may give rise to discrimination.</p> <p>b. Demonstrate that employer has clear and transparent company procedures that outline how to raise, file, and respond to discrimination complaints and that these policies are understood and adhered to by staff.</p> <p>c. Demonstrate that employer proactively respects the principle of equal pay for equal work and equal access to job opportunities, promotions and raises.</p> <p>d. Demonstrate that all managers and supervisors receive training on diversity and non-discrimination and pro-active tolerance of diversity. All personnel receive non-discrimination training. Internal or external training is acceptable if proven effective.</p> <p>e. Others, please describe</p>	<p>Handbook for employees (Medarbejderhåndbog Maximus A/S & Sashimi Royal A/S, 16 pages), dd 24-8-2018 describes rules and regulations and include health & safety, anti-discrimination, harassment, child labour and young workers.</p> <p>Employees have access through network. E-mail was sent to employees by Lenette to all 18 (Maximum and Sashimi) employees dd 30-8-2018. At Sashimi Royal there are 12 employees in total.</p>	Compliant	
6.3.2	<p>Indicator: Number of confirmed incidences of discrimination.</p> <p>Requirement: None.</p> <p>Applicability: All.</p>	<p>a. Employer maintains a record of all discrimination complaints. Records do not show evidence that the farm discriminates on grounds related to age, gender, religion, race, creed, caste, sexual orientation, national origin, disability, union membership, political affiliation or any other condition that may give rise to discrimination.</p> <p>b. Interview with employees and employee testimonies will be used to confirm that the company does not interfere with the rights of personnel to observe tenets or practices, or to meet needs related to race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or any other condition that may give rise to discrimination.</p> <p>c. Others, please describe</p>	<p>There is a list of conflict/discrimination/grievance - minimum 90m days to resolve. The closest leader is responsible.</p>	Compliant	
6.3.3	<p>Indicator: Equality of pay, benefits and promotion opportunities for all employees independent of gender, age, race, religion, creed, caste or sexual orientation.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Include in anti-discrimination policy reference to equality of pay, benefits and promotional opportunities being independent of race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or any other condition that may give rise to discrimination.</p> <p>b. Interview with employees and employee testimonies will be used to confirm that the company does not discriminate on pay, benefits or promotional opportunities on the basis of race, caste, religion, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or any other condition that may give rise to discrimination.</p> <p>c. Others, please describe</p>		Compliant	
6.3.4	<p>Indicator: number of incidents where employer dismisses an employee on the basis of marital status or pregnancy or deny employee legal rights to pregnancy or maternity leave.</p> <p>Requirement: None.</p>	<p>a. Check human resource records and employee files to verify grounds for dismissal or incidents of denying employee legal rights related to maternity or paternity leave.</p> <p>b. During the on-site audit, interview employees in relation to grounds for dismissal and company performance with respect to the granting of parental leave.</p> <p>c. Others, please describe</p>	<p>HR records / employee files verified. No breach noticed.</p> <p>There is 1 employee on maternity leave - for 9 months. In Denmark it is 12 months (divided by man and women).</p>	Compliant	
Criterion 6.4 Work environment health and safety					
6.4.1	<p>Indicator: Percentage of employees trained in health and safety practices, procedures and policies relevant to the job.</p> <p>Requirement: 100% for operations above five employees.</p> <p>Applicability: All.</p>	<p>a. Employer has documented practices, procedures (including emergency response procedures) and policies to protect employees from workplace hazards and to minimize risk of accident or injury. The information shall be available to employees.</p> <p>b. Employees know and understand emergency response procedures.</p> <p>c. Employer conducts health and safety training for all employees on a regular basis (once a year and immediately for all new employees), including training on potential hazards and risk minimization, Occupational Safety and Health (OSH) and effective use of PPE.</p> <p>d. Others, please describe</p>	<p>Health & Safety training includes emergency response. New employees will not work with chemical compounds.</p> <p>Training given to 5 employees in production, dd 18-6-2018. Training material includes PPE requirements, chemical reactions in case of mixing etc. MSDS sheets are discussed, incl. adressed what to do in case of accident</p>	Compliant	
6.4.2	<p>Indicator: Safety equipment (Personal Protective Equipment, PPE) provided and maintained and in use.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Employer provides workers with PPE that is appropriate to known health and safety hazards.</p> <p>b. Employees receive annual training in the proper use of PPE. For workers who participated in the initial training(s) previously an annual refreshment training may suffice, unless new PPE has been put to use.</p> <p>c. During the on-site audit, employees will be interviewed to confirm the above.</p>	<p>PPE is required for the chemicals; it is present at the areas where it is used. It is also used as verified during interviews.</p>	Major	Chemical storage outdoors is not suitable for the chemicals stored. Set as Major as it may cause significant damage if things go wrong.

		d. Others, please describe	Chemical storage outside is not suitable for the chemicals stored.		
6.4.3	Indicator: All health and safety related accidents and violations are recorded and corrective actions taken when necessary. Requirement: Yes. Applicability: All.	a. Employer records all health- and safety-related accidents.	H&S related accidents are recorded (complete H&S incident documentation incl. root cause analyses and corrective action plan). Worker interviews confirmed above. Accident in May/June - 1 employee fell into the fish production compartment/tank. This is not recorded. TS is responsible person for employees' health & safety.	Minor	Not all accidents are recorded. Raised as minor, as isolated incident.
		b. Employer records and maintains complete documentation for all occupational health and safety events, accidents, violations and investigations.			
		c. Employer implements corrective action plans in response to any accidents that occur. Plans are documented and they include an analysis of root cause, actions to address root cause, actions to remediate, and actions to prevent future accidents of similar nature.			
		d. Interview employees in order to determine what procedures are implemented and explain what analysis has been done and what steps were taken on foot of accidents or health and safety related events or concerns.			
		e. Others, please describe			
6.4.4	Indicator: Evidence of employer responsibility and/or proof of insurance (accident or injury) for 100% of worker costs in a job-related accident or injury when not covered under national law. Requirement: None. Applicability: All.	a. Employer maintains and makes available documentation to confirm that all personnel are adequately insured to cover costs related to occupational accidents or injuries (if not covered under national law). Equal insurance coverage must be provided to all workers including part-time, temporary, migrant or foreign workers. Written contract of employer responsibility to cover accident costs is acceptable evidence in place of insurance.	Insurance is mentioned in the Employee Handbook to cover injuries and illness related to working environment and not. This is very strict regulated in Denmark.	Compliant	
		b. Others, please describe			
Criterion 6.5 Wages					
6.5.1	Indicator: Percentage of workers whose basic wage (before overtime and bonuses) is below the minimum wage. Requirement: 0%. Applicability: All.	a. Employer keeps documents to show the legal minimum wage in the country of operation. If there is no legal minimum wage in the country, the employer keeps documents to show the industry-standard minimum wage. The intention of this indicator is to protect the most vulnerable workers, other staff such as managers may be paid in kind and are not to be considered as 'workers' for the purpose of this indicator.	Minimum wage is around 18.000DKr. per month. Monthly salaries are all higher than that. Legal minimum wage in Denmark is: 1341,30 EUR for 21 year old worker and 1578,00 EUR for 22 year old worker or older	Compliant	
		b. Employer's records (e.g. payroll) confirm that worker's wages for a standard work week (48 hours) always meet or exceed the legal minimum wage. If there is no legal minimum wage, the employer's records must show how the current wage meets or exceeds industry standard. If wages are based on piece-rate or pay-per-production, the employer's records must show how workers can reasonably attain (within regular working hours) wages that meet or exceed the legal minimum wage.			
		c. Maintain documentary evidence (e.g. payroll, timesheets, punch cards, production records, and/or utility records). Workers will be interviewed during on-site audit to verify conformity with the above.			
		d. Others, please describe			
6.5.2	Indicator: The percentage of workers whose basic wage (before overtime and bonuses) is below the basic needs wage 5 years after adoption of the standard. Requirement: 0%. Applicability: All.	a. Auditor to calculate the basic needs wage and compare it to the farm's calculation to verify for accuracy.	Already compliant	Compliant	
		b. Provide evidence that all farm workers are paid at least the basic needs wage (before overtime and bonuses) within 5 years of publication of the seriola and cobia standard.			
		c. Demonstrate basic needs wage for the country of operation. The audit team will verify accuracy of the calculation and end figure.			
		d. Others, please describe			
6.5.3	Indicator: Evidence of transparency in wage-setting and rendering. Requirement: Yes. Applicability: All.	a. Wages and benefits are clearly articulated to workers and documented in contracts.	Transparency in wage setting and overtime compensation. Seen contract - Overtime description is hourly pay + overtime 400DKr. O&S overtime compensation can be better described.	Compliant	
		b. The method for setting wages is clearly set out and explained to workers.			
		c. Employer renders wages and benefits in a way that is convenient for the worker (e.g. cash, check, or electronic payment method). Workers do not have to travel to collect benefits nor do they receive promissory notes, coupons or merchandise in lieu of payment.			
		d. Workers will be interviewed to confirm conformity with the standards requirements.			
		e. Others, please describe			
Criterion 6.6 Access to freedom of association and the right to collective bargaining					
6.6.1	Indicator: Percentage of employees with access to trade unions, worker organizations, and/or the ability to self-organize as well as the ability to bargain collectively or access the representative(s) chosen by workers without management interference. Requirement: 100%. Applicability: All.	a. Demonstrate that all workers have the freedom to join a trade union or any legitimate workers organization, free of any form of interference from employers or competing organizations set up or backed by the employer. Farms shall prepare documentation to demonstrate to the auditor that domestic regulation fully meets these criteria.	Only 12 employees. No union on-site (no legal obligation). Workers are free to join a union - and they do, as verified during the audit. Different employees are member of different unions.	Compliant	
		b. Demonstrate that workers are permitted to self-organize and/or engage in collective bargaining.			
		c. During interviews with workers, verify conformity with the requirements of 6.6.1 and that workers are free to access worker chosen representatives without interference from management or agents of the company.			
		d. Others, please describe			
6.6.2	Indicator: Incidences of members of unions or worker organizations being discriminated against. Requirement: None. Applicability: All.	a. During interviews with workers and workers representatives, determine if there are incidents of members of unions or workers organizations being discriminated against by management.	No such incidences occurred.	Compliant	
		b. Review any stated cases of discrimination on the basis of union membership or membership of workers organisations with management to verify whether the farm is in conformity with requirements of the standard.			
		c. Others, please describe			
Criterion 6.7 Harassment and disciplinary practices in the working environment causing temporary or permanent physical and/or mental harm					
6.7.1	Indicator: Incidences of excessive or abusive disciplinary Actions. Requirement: None. Applicability: All.	a. Verify that the employer does not use threatening, humiliating or punishing disciplinary practices that negatively impact a worker's physical and mental health or dignity.	There are no indications of the use of threatening, humiliating or punishing. Disciplinary practices are mentioned in the Employee Handbook. Not take part of salary.	Compliant	
		b. Allegations of corporal punishment, mental abuse, physical coercion, or verbal abuse must be fully documented in a company procedure so that these can be corroborated by auditors.			
		c. During on-site audit, workers will be interviewed to determine whether there is evidence of excessive or abusive disciplinary actions.			
6.7.2	Indicator: Evidence of clear, fair and transparent disciplinary procedures documented and communicated to employees. Requirement: Yes. Applicability: All.	a. Employer has written policy for disciplinary action which explicitly states that its aim is to improve the worker. Maintain evidence that employees are aware of procedures and that the process is transparent.	Social policy is covered in the Employee Handbook. First time verbal warning, second time in writing and third time can get fired employees on fixed salaries. This is taken up in the Legislation. This is not documented in the Employee Handbook.	Minor	Disciplinary procedures are not documented. Raised as minor, as only documentation is missing.
		b. Maintain documentary audit trail for incidences of disciplinary action and outcome (incl. worker evaluation reports). Workers may be interviewed during on-site audit to determine level of conformity and that disciplinary action policy is fair and effective.			
		c. Others, please describe			
6.7.3	Indicator: Evidence that incidences of harassment are recorded and addressed with corrective actions. Requirement: 100%. Applicability: All.	a. Employer has in place a policy in relation to harassment of workers. The policy requires a procedure to be initiated in the event of incidents of harassment by management of workers or between workers. The procedure is documented and records details, action taken, outcome and corrective actions required.	Harassment record form in place. No such incidences occurred.	Compliant	
		b. During the on-site audit, interview workers with respect to harassment, policies and procedures as well as examples of harassment action and outcomes to verify level of compliance.			
		c. Others, please describe			
Criterion 6.8 Working hours and overtime					
6.8.1	Indicator: Incidences, violations or abuse of working hours or overtime laws. Requirement: None. Applicability: All.	a. The employer must make available documentation showing the legal requirements for working hours and overtime in the region where the farm operates. If local legislation allows workers to exceed internationally accepted recommendations (48 regular hours, 12 hours overtime) then requirements of the international standards apply.	Not more than 48hrs/week over a 4-month period of time (EU legislation). It is not clear if the employees work during the week on-duty. Minimum wage in Denmark is around 18.000DKr. per month. Salaries are all higher than that.	Minor	It is not clearly documented how overtime is compensated; different employees give different explanations. Therefore, raised as minor.
		b. Examination of a randomly selected sample of records (by the auditor) - including time sheets and payroll records show that farm workers do not exceed the number of working hours allowed under the law.			
		c. If an employer requires employees to work shifts at the farm (e.g. 10 days on and six days off), the employer compensates workers with an equivalent time off in the calendar month and there is evidence that employees have agreed to this schedule (e.g. in the hiring contract)			
		d. Farm workers may be interviewed to confirm there is no abuse of working hours and overtime laws.			
		e. Others, please describe			
6.8.2	Indicator: Overtime is limited, voluntary, paid at a premium rate and restricted to exceptional circumstances. Requirement: Yes. Applicability: All farms unless exempted.	a. Make available payment records (e.g. pay advice) show that workers are paid a premium rate for overtime hours.	Having the weekend or week alarm telephone is part of the job and taken up in the contract that it is additional to the 37hours work-week. Overtime payment is reduced to a minimum. Overtime is compensated by time. Weekend and evening stand-by job is taken up in the job description. Per alarm, there is paid extra (400 DKr.) if the employees need to come to the site and also if they can fix the problem from home.	Major	The alarm phone is held for 7 days in a row, additional to the regular 37 hours work-week. The 4-5 employees get the alarm phone approx. once monthly. There are many false alarms going off (up to every 15 minutes in the night).
		b. Overtime is limited and occurs in exceptional circumstances as evidenced by farm records (e.g. production records, time-sheets, and other records of working hours)			
		c. Workers may be interviewed to confirm that all overtime is voluntary (unless there is a collective bargaining agreement in place which specifically allows for compulsory overtime).			
		c. Others, please describe			
Criterion 6.9 Contracts or other written employment agreements					
6.9.1	Indicator: other written employment agreements. Requirement: 100%. Applicability: All.	a. The employer maintains a record of all employment contracts.	Alarm phone will be paid when employees need to come to the workplace at the time of duty and also when they can fix the problem from home. Job description of B. Includes that he needs to take part in the alarm stand-by schedule. It is not mentioned how many times this will be. It is around one.	Compliant	
		b. There is no evidence for labor-only contracting relationships or false apprenticeship schemes.			
		c. Be advised that workers will be interviewed to confirm the above.			
		d. Others, please describe			

6.9.2	<p>Indicator: Evidence of a policy to ensure social compliance of its suppliers and contractors when operating on the farm site.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Farm has a policy to ensure that all companies contracted to provide supplies or services (e.g. divers, cleaning, maintenance) have socially responsible employment practices and policies.</p> <p>b. Producing company has criteria for evaluating its suppliers and contractors. The company keeps a list of approved suppliers and contractors.</p> <p>c. Producing company keeps records of communications with suppliers and subcontractors that relate to compliance with 6.7.2.</p> <p>d. All workers on site including those indirectly employed are to be protected by the requirements of Principle 6 and the auditor can check records, observations and interviews with these workers to evaluate compliance.</p> <p>e. Others, please describe</p>	<p>It is taken up in the Employee Handbook/Social Policy that temporary workers and service staff are employed under socially responsible terms. Seen contract with Team Vikarer, dd 17-8-2018 - no reference to social practices. No contract with diving company. Interview with temporary employee showed no evidence of that there.</p>	Major	<p>No reference to social practices in contract with outsourcing company. No contract with diving company. No reference to compliant social practices with cleaning company. Set as Major as there is no evidence that social practices are fully implemented by the subcontractors.</p>
Criterion 6.10 Conflict resolution					
6.10.1	<p>Indicator: Evidence of worker access to effective, fair and confidential grievance procedures.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. The employer has a clear labor conflict resolution policy for the presentation, treatment, and resolution of worker grievances in a confidential manner, supported by a documented procedure.</p> <p>b. Workers are familiar with the company's labor conflict resolution policies and procedures. There is evidence that workers have access to fair treatment of complaints.</p> <p>c. The farm must maintain documentary evidence (e.g. complaint or grievance filings, minutes from review meetings). Workers may be interviewed during on-site audit in order to verify conformity.</p> <p>d. Others, please describe</p>	<p>Taken up in Employee Handbook and Record form in place with 90-days closing of these issues</p>	Compliant	
6.10.2	<p>Indicator: Percentage of grievances handled that are addressed within a 90-day timeframe.</p> <p>Requirement: 100%.</p> <p>Applicability: All.</p>	<p>a. The employer maintains a record of all grievances, complaints and labor conflicts that are raised.</p> <p>b. The employer keeps a documentary record of follow-up and outcome, according to procedural requirements (including corrective actions) and timeframe in which grievances are addressed.</p> <p>c. Workers will be interviewed to verify conformity with the procedure for dealing with grievances and that they were addressed within a 90-day timeframe.</p> <p>d. Others, please describe</p>	<p>Taken up in Employee Handbook and Record form in place with 90-days closing of these issues</p>	Compliant	
Criterion 6.11 Living conditions for employees accommodated on the farm					
6.11.1	<p>Indicator: Farm employees have access to clean, sanitary, safe and suitable living conditions.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Provide evidence that potable/safe drinking water is always available for workers</p> <p>b. Provide evidence that adequate sanitary facilities are available for workers</p> <p>c. Provide evidence of safe, secure and quality accommodation sufficient to withstand local conditions in the event of storms or other natural events that could endanger lives.</p> <p>d. Provide evidence that accommodation provided is suitable to workers needs (and their family's), appropriate for their gender if accommodated on site also.</p> <p>e. Others, please describe</p>	<p>Canteen is very neat and hygiene procedures implemented at all places.</p>	Compliant	
6.11.2	<p>Indicator: Existence of separate sanitary and toilet facilities for men and women; with the exception of work sites with fewer than 10 employees or where married couples are working and accommodated together.</p>	<p>a. Provide separate and suitable sanitary and toilet facilities are available for men and women, with the possible exception of married couples being accommodated together and at work sites that have less than 10 employees.</p> <p>b. Others, please describe</p>	<p>Sanitary facilities are very good.</p>	Compliant	
PRINCIPLE 7: BE A GOOD NEIGHBOR AND CONSCIENTIOUS CITIZEN PRACTICES					
Criterion 7.1 Community engagement					
7.1.1	<p>Indicator: Evidence of regular and meaningful consultation and engagement with community representatives and organizations.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. The farm pro-actively arranges for consultations with the local community at least twice every year (bi-annually).</p> <p>b. Consultations are meaningful. OPTIONAL: the farm may choose to use participatory Social Impact Assessment (pSIA) or an equivalent method for consultations.</p> <p>c. Consultations include participation by representatives from the local community who were asked to contribute to the agenda in advance of meetings.</p> <p>d. Consultations include communication about, or discussion of, the potential human health risks of therapeutic treatments. The intention is for the farm to resolve conflicts that the farm has control / responsibility over and interviews are to be conducted in language appropriate to the community. Not to use technical language like for instance, 'theraputants'.</p> <p>e. Maintain records and documentary evidence (e.g. meeting agenda, minutes, report) to demonstrate that consultations comply with the above.</p> <p>f. Be advised that representatives from the local community and organizations may be interviewed to confirm the above.</p> <p>g. Others, please describe</p>	<p>The farm pro-actively arranges for consultations with the local community at least twice every year (bi-annually).</p>	Minor	<p>No evidence of pro-active engagement of community. Set as minor as single incident and no suspect that stakeholders are not heard.</p>
7.1.2	<p>Indicator: Presence and evidence of an effective policy and mechanism for the presentation, treatment and resolution of complaints by community stakeholders and organizations.</p> <p>Requirement: Yes.</p> <p>Applicability: All.</p>	<p>a. Farm policy provides a mechanism for presentation, treatment and resolution of complaints lodged by stakeholders, community members, and organizations.</p> <p>b. The farm follows its policy for handling stakeholder complaints as evidenced by farm documentation (e.g. follow-up communications with stakeholders, reports to stakeholder describing corrective actions).</p> <p>c. The farm's mechanism for handling complaints is effective based on resolution of stakeholder complaints (e.g. follow-up correspondence from stakeholders).</p> <p>d. Be advised that representatives from the local community, including complainants where applicable, may be interviewed to confirm the above.</p> <p>e. Others, please describe</p>	<p>It is taken up in the Company's Handbook that external complains are seriously taken up by the management. Before construction, EIA is carried out dd 27-8-2014, where stakeholders got the opportunity to complain. No complaints received by Thisted Kommune. (2.500 inhabitants in the village Hanstholm).</p>	Compliant	
Criterion 7.2 Respect for local cultures and traditional territories					
7.2.1	<p>Indicator: Local groups consulted during project design and operation.</p> <p>Requirement: At least 2x per year or as required by relevant local and/or national laws and regulations.</p> <p>Applicability: All.</p>	<p>a. As required by law in the jurisdiction: - farm consults with local and/or indigenous groups and retains documentary evidence (e.g. meeting minutes, summaries) to show how the process complies with 7.2.1b.</p> <p>b. Farm management demonstrates an understanding of relevant local and/or national laws and regulations that pertain to consultations with indigenous groups.</p> <p>c. Representatives from the local community, including complainants where applicable, may be interviewed to confirm the above consultation and engagement with local groups at planning and operational stages.</p> <p>d. Others, please describe</p>	<p>EIA carried out and report dd 27-8-2014 informed the following stakeholders: - Health/medical institution for North Jutland Region - Outdoor Council - Nordvest Outdoor Council - Denmark's Nature Conservation Association - Nature Agency - Danish Ornithological Society - Danish Recreational Fisheries Association - The Danish Sportsfishing society - Denmark's Fisheries Association</p>	Compliant	
Criterion 7.3 Access to resources					
7.3.1	<p>Indicator: Changes undertaken restricting access to vital community resources without community approval.</p> <p>Requirement: 0.</p> <p>Applicability: All.</p>	<p>a. Resources that are considered vital to the community have been documented and are known by the farm (i.e. through the assessment process required under indicator)</p> <p>b. The farm seeks and obtains community approval before undertaking changes that restrict access to vital community resources. Approvals are documented.</p> <p>c. Representatives from the community may be interviewed to provide evidence of whether or not the farm has restricted access to vital resources without prior community approval.</p> <p>d. Others, please describe</p>	<p>Addition of fresh water well dd 9-5-2016. Approval through EIA by Thisted Kommune, including stakeholders consultation.</p>	Compliant	
7.3.2	<p>Indicator: Assessments or company's impact on access to resources.</p> <p>Requirement: At least once per year.</p> <p>Applicability: All.</p>	<p>a. There is a documented assessment of the farm's impact upon access to resources. Can be completed as part of community consultations under 7.2.1.</p> <p>b. Representatives from the community may be interviewed to generally corroborate the accuracy of evidence presented in 7.3.2a.</p> <p>c. Others, please describe</p>	<p>Seen procedure and results, incl. public consultation of use of fresh water well.</p>	Compliant	

11 Findings

Risk ev 11.1 **DO NOT DELETE ANY COLUMN**

11.2 Columns B/C/D/E (in black) are automatically populated from the species checklist/audit manual
Each NC is raised against a standard indicator or a CAR requirement

E1. The CAB: 11.4 Use the "sort" function for presenting the list to your liking (e.g. grading, status, closure deadline, etc.)

E2. The CAB shall add the list of additional threats (Annex E, E4.2.1.ii) to this table and provide its risk category and an explanation to support it to this table.

11.5 Add new rows as needed

11.6 Adjust the column wide as needed - to show the whole text

NC reference	Indicator	Grade of NC	Description of NC	Evidence	Date of detection	Status	Related VR (H)	Root cause (by client)	Corrective/preventive actions proposed by UoC and accepted by CAB	Deadline for NC close-out	Evaluation by CAB (including evidence)	Actual date of close-out
	1.1.1	Minor	N, P and BOD limits set by EIA are not met (see 1.1.4). No documented evidence on compliance to ICES for introduction and culture of non-native species by Maximus (sister company) in 2015.	(a) copies of the following 5 applicable laws and regulations relating to fish farming in Denmark are available: building/construction regulations, environmental protection law, guidance on the approval for saltwater fish farming, Discharge Law, Feed Law. Description in Company Handbook V1.1, Chapter Myndigheder, dd 2-9-2018. Water intake is covered in Environmental protection law and in the guidance on the approval of saltwater fish farming. Maximum levels for N and P in effluent water are 44 and 4.8 Kg per MT fish produced and BOD limit is 175. The limits in the EIA for Sashimi Royal are set at 20, 2.4 and 6 respectively. No requirements from the government regarding Total N and P released, but annual limits are set by the EIA for Sashimi Royal at 48 and 5.5 Kg/MT produced fish. Production data of 2017 used, records of 2018 available.	05-09-18	Closed	N/A	The root cause is that due to starting up the outlet/kg fish is not met	EIA p. 8 requirements re. total outlet is met: tot-N 48 t/year tot-P 5.5 t/year. Due to starting up the outlet/kg fish is not met, but will be as soon as full production is in place. Thisted Municipality has confirmed compliance for our reports and further that "The municipality of Thisted has no current environmental concerns with Sashimi Royal A/S" We have reevaluated the documents of approval of introduction of non-native species, and the approval is based on the enclosed documents: • Authorization for use of Seriola l. for aquaculture in closed recirculating systems • Import permission for Maximus. This includes, and is mentioned specific, the use for aquaculture and for breeding. Notes: • Standard 3.1.1 states that culture of a non-native species is allowed in a closed land-based production system with minimal risk of escape. • Introduction to Europe (i.e. Holland) has been evaluated before the introduction to Denmark	05-12-18	Governmental approval for Sashimi Royal in place, including introduction and production of this species.	15-10-18
	1.1.4	Minor	The max. limits of N, P and BODS set by the EIA are exceeded for 2017. An approval letter from the local Kommune is available, therefore set as minor. There is no explanation given in the approval letter. Monitoring and records available for 2018, but no results of calculations available. If more information is available DNV GL may consider to ask for a variance request at ASC, if required. Limits for max. intake water (fresh- and seawater) to be explained, incl. calculations.	Annual abstraction is limits for freshwater is 110,000m ³ . In the first half of 2018, 49,541m ³ is used and in compliance. Discharge is in the municipality waste water collection. Effluent Limit set by the Government: (No limits on max release on total values) max 44kg N/MT produced fish max 4.8kg P/MT produced fish max 175 kg BOD /prod. ton Limits set for Sashimi Royal, based on EIA, dd 27-8-2014 max 48MT Total N in effluent water max 5,5MT Total P in effluent water max 20kg N/MT produced fish max 2.4kg P/MT produced fish max 6 kg BOD /prod. ton Lab Measurement in 2017 of Total N, Total P and BOD are within the limits: 2.3MT Total N in effluent water 0.24MT Total P in effluent water BODS 0,81 Measured & calculated, based on biomass produced: 34kg N/MT produced fish 3.44kg P/MT produced fish 12 kg BOD /prod. ton	05-09-18	Closed		The root cause is that due to starting up the outlet/kg fish is not met	The monitoring, records and calculations for 2017 were available. Calculations for 2018 is enclosed. Total N and total-P are fulfilled, but the specific values 20 kg N /produced t fish, 2,4 kg P /produced t fish and 6 kg BOD /produced t fish are not met due to not full production Limits for max. intake of sea and freshwater i.e. 600.000 m ³ /y and 110.000 m ³ /y are met and have been sent 11-09-2018 and 12-10-2018 incl. monitoring and calculations.	05-12-18	Governmental approval for Sashimi Royal in place, including explanation of water quality limits. Enough evidence that Sashimi Royal is in compliance with regulations and permits concerning water quality impacts (no VR required).	15-10-18
	2.3.1	Minor	Not clear which threatened species are present in the area. Not mentioned in the EIA. IUCN list is not accessed. The impact of the farming activities is low to negligible, therefore set as minor, however, information on species is missing/required.	A. https://areainformation.miljoportal.dk (Denmark's Environmental portal) shows different types of nature around the farm. Authority portal on threatened species in the area with 2 species at 1 side and 1 species at the other side of the farm. It is not known which species it concerns. The company tried to find out, but could not get the information from the environmental portal (danmarksmiljoportal) and from the National Centre for Environment and Energy (DMU) - question on email dd 9-7-2018 remains without an answer. Description in Company Handbook V1.1, Chapter Myndigheder, dd 2-9-2018 and in the EIA that the company (indoor RAS production) has limited impact on the environment. No additional mitigation is required. Also verified during the on-site audit (including harvest). http://bios.au.dk/raadgivning/natur/redlistframe/	05-09-18	Closed	N/A	Root cause: Threatened species was not mentioned in the EIA / 2014. Governmental portal https://areainformation.miljoportal.dk did not mention specific threatened species. At last the threatened species and Biodiversity Environmental Impact Assessment was found in EIA additional document re. freshwater intake from 20th of June 2016	EIA additional document re. freshwater intake 20th of June 2016 p. 31-34 (Biodiversity Environmental Impact Assessment) is translated and enclosed. Preliminary impact assessment of habitat types and Preliminary assessment of Annex IV species (EU Habitats Directive): 11 annex-IV species that may potentially be found in the area is assessed. In the document it is concluded that the project will not affect natural habitats or species which are the designation basis for Natura 2000 area No. 24, H 220 in a significant way and therefore there is no need for a closer impact assessment. Further: The establishment of saltwater farming will not have a significant impact on those Annex IV species or their breeding or habitats as well as the ecological functionality is maintained at the same level Further it is assessed in the factory manual p. 11-13. Enclosed.	05-12-18	List of threatened species in the area available in: Liste over bilag IV/fredede arter der potentielt kan forekomme i området (List of Annex IV /protected species that may potentially occur in the area).	15-10-18
	2.3.2	Major	Different maps show different results regarding PAs in the region. It is not clear what the rules of the protected area are and definition of building in the area (licences etc.). It is not clear from EIA. The farm is located near other farms and plants and near the harbour area. If more information is available DNV GL may consider to ask for a variance request at ASC, if required.	A. Map with Natura 2000 area shows that the farm is located adjacent to that. B. The farm is located next to a Natura 2000 area with protected nature. There is a Natural Park 2,3km from the farm. VVM/EIA screening (dd 27-8-2014) states that there are no additional measures required to mitigate the farm's impact on it. According to a local website, it is located in protected environment https://areainformation.miljoportal.dk (Denmark's Environmental portal). Information is not clear and contradictory.	05-09-18	Closed	N/A	Root cause: From the beginning we have considered that the governmental approval of the area for aquaculture in the EIA, 2014 was sufficient. Informations regarding PA was found in the EIA additional document re. freshwater intake from 20th of June 2016	The map in the EIA 23-04-2014 is the background for the enterprise evaluation and approval. All relevant stakeholders EIA p. 21 have been involved. Also accessed in factory manual p. 7 List links to all stakeholders: https://tiluftsraadet.dk/ , https://friluftsradet.dk/nordvest , https://www.dn.dk/ https://naturstyrelsen.dk/ , http://www.dof.dk/ , http://www.fritidsfiskerforbundet.dk/ , https://www.sportsfiskeren.dk/ , http://fiskeriforening.dk/ , http://www.ferskvandsfiskerforeningen.dk/ , http://www.greenpeace.org/denmark/da/ , http://www.hanstholmhavn.dk/da/	05-12-18	Governmental approval for Sashimi Royal in place, including approval for the current production/location. This approval has been made after extensive stakeholder consultations and there is enough evidence that Sashimi Royal is in compliance with 2.3.2 and that no VR required.	15-10-18
	2.4.2	Minor	No list of mortalities of endangered and red-listed species available at the farm (See 2.3.1).	A. List of endangered and red-listed animals occurring in the farm area and surrounding areas. B. Impact level very low with indoor production. Staff is aware. The company has a list for records of dead animals, which is empty dd 16-8-2018. Animals are never killed is taken up in the company's Handbook, dd 2-9-2018.	05-09-18	Closed	N/A	Root cause: Because a list of threatened / annex 4 species was not available at the time for the audit we could not make a list of mortalities / records before now.	In EIA additional contract re. freshwater intake 20th of June 2016 p. 33 endangered Annex IV species is listed. (enclosed). Assessed in factory manual p. 13 and in mortality list (enclosed)	05-12-18	Record form available in: Aflivning/påført dødelighed af Bilag 4 /fredede dyrearter*) på virksomhedens areal (Killing / inflicted mortality of Annex 4 /protected species) on the company's area - with ref. To the list (2.3.1).	15-10-18
	3.2.1	Minor	Broodstock purchase/origin documentation does not clearly identify whether stock is transgenic or not. There is no suspect, therefore classified as minor.	A. Company declaration stating that the farm does not use transgenic stock, signed by CEO, dd 17-8-2018. B. Seen transportation documents for broodstock from the Netherlands from 2015. Broodstock purchase/origin documentation does not clearly identify whether stock is transgenic or not. There is no suspect.	05-09-18	Closed	N/A	Root cause: We was not aware of that a declaration from Maximus was required	Original broodstock supplier Kingfish Seeland / Kees Kloet is ASC certified (ASC-SGS-F-002) and they are not allowed to use GMO fish Fingerling supplier Maximus non-GMO declaration is enclosed Note: The tradition in hatching Seriola l. is very short and quite unsuccessful. It is therefore impossible that Seriola should have been a subject to gmo fertilization.	05-12-18	Seen declaration of Maximus A/S, dd 3-10-2018.	15-10-18
	4.1.1	Minor	No information on the sources of fish meal and fish oil from Skretting. Biomar ASC-Feed Compliance certificate does not include Seriola. Skretting and Biomar are very well acquainted with the ASC standard and provide ASC-compliant feed to other farms. Sashimi Royal has informed the feed suppliers to be compliant with the ASC standard. Therefore, this NC is set as minor, as there is no suspect of system failure and/or that certification integrity is at risk.	A. Feed is currently obtained from Skretting, Spain. Feed was formerly obtained from Biomar, Denmark. Seen report to the Government relating to type and amount of feed, dd 25-4-2018. Total 64MT used in 2017. At intake, samples are taken from each batch and stored. Batch numbers are recorded. OBS - Feed batch number is not recorded in the system yet.	05-09-18	Closed	N/A	Root cause: Informations from Skretting was not available at the time of Audit. Biomar feed has a minimum carbohydrate content which is obligatory for Seriola. Note: Biomar has a certificate that complies with ISEAL feed producers described in "ASC Freshwater Trout Standard version 1.0 Jan 2013 principle 5", "ASC Salmon Standard version 1.0 June 2012 principle 4" and "ASC Interim Solution for the marine raw material used in feed". Enclosed	Source of fish meal and fishoil from Skretting 2017 and 2018 enclosed Biomar feed has a minimum carbohydrate content which is obligatory for Seriola. Note: Biomar has a certificate that complies with ISEAL feed producers described in "ASC Freshwater Trout Standard version 1.0 Jan 2013 principle 5", "ASC Salmon Standard version 1.0 June 2012 principle 4" and "ASC Interim Solution for the marine raw material used in feed". Enclosed	05-12-18	Declaration of Skretting dd 4-10-2018 in place. And overview of feed types with information on sources for fish meal and fish oil used.	15-10-18

4.2.1	Major	Information from Skretting does not contain species and source of fish meal and fish oil. Calculation are not carried out, it can not be evaluated, therefore set as Major NC.	A. Records are complete for Biomar, but not for Skretting (% of fish meal and fish oil in place, no information on the different sources of fish meal, species and fisheries. B. Records not complete for Skretting, which is the major feed supplier in 2017 and 2018. No info on trimmings/fisheries.	05-09-18	Closed	N/A	Root cause: Informations from Skretting was not available at the time of Audit.	Source of fish meal and fishoil from Skretting 2017 and 2018 enclosed. Marked "X" is what we have used in 2017 and 2018. Calculations attached: FFDR FM=1,7 FFDR FO=1,5	05-12-18	FFDR to be calculated. Information from Skretting includes species and source of fish meal and fish oil. Declaration from Skretting dd 4-10-2018: 'Marine raw material used in their formula are categorized as B2, according with the annex 4 in Interim solution on Marine Raw Material Requirements in the ASC Farm standards, approved 21 September 2016'. 15-11: calculations in place.	15-11-18
4.3.1	Minor	Information from Skretting, Spain, the major fish feed supplier is not complete. Set as minor, see 4.1.1.	Documentation that indicates the relative quantities of fishmeal and fish oil used in feed manufacture that is certified under an ISEAL member's accredited certification. No information from Skretting.	05-09-18	Closed	N/A	Root cause: Informations from Skretting was not available at the time of Audit.	Source of fish meal and fishoil from Skretting 2017 and 2018 enclosed. Marked "X" is what we have used in 2017 and 2018	05-12-18	Quantities of fishmeal and fish oil used in feed manufacture that is certified under an ISEAL member's accredited certification.	15-10-18
4.3.2	Minor	Information from Skretting, Spain, the major fish feed supplier is not complete. Set as minor, see 4.1.1.	0	05-09-18	Closed	N/A	Root cause: Informations from Skretting was not available at the time of Audit.	Source of fish meal and fishoil from Skretting 2017 and 2018 enclosed. Marked "X" is what we have used in 2017 and 2018	05-12-18	Information from Skretting shows the sources that are IFFO RS certified.	15-10-18
4.3.3	Minor	Information from Skretting, Spain, the major fish feed supplier is not complete. Set as minor, see 4.1.1.	No list of the fishery of origin for all fishmeal and fish oil originating from by-products and trimmings.	05-09-18	Closed	N/A	Root cause: Informations from Skretting was not available at the time of Audit.	Source of fish meal and fishoil from Skretting 2017 and 2018 enclosed. Marked "X" is what we have used in 2017 and 2018	05-12-18	By-products are mentioned in the Declaration from Skretting, dd 4-10-2018.	15-10-18
4.4.3	Minor	Information from Skretting, Spain, the major fish feed supplier, is not complete. Statement that 'no soy and palm oil are used', but ... declared in ingredient list of feed. Raised as minor - see 4.1.1.	0	05-09-18	Closed	N/A	Root cause: Informations from Skretting was not clear, but has been corrected	Skretting has clarified that their statement "no soy and palm oil" means "no soy oil and no palm oil", so misunderstandings can be avoided. Skretting has sent an updated certificate dated 04-10-2018 (enclosed)	05-12-18	Information is complete. Declaration from Skretting dd 4-10-2018: 'According with their formulation, the non-marine ingredients suppliers are not certified by an ISEAL Member's certification scheme' and 'Do not contain any soy oil or palm oil in their formula'.	15-10-18
6.4.2	Major	Chemical storage outdoors is not suitable for the chemicals stored. Set as Major as it may cause significant damage if things go wrong.	PPE is required for the chemicals; it is present at the areas where it is used. It is also used as verified during interviews.	05-09-18	Closed	N/A	Root cause: Our background was to meet the requirements of the Danish Working Environment Act	We have implemented the following procedures: 1. Chemicals are not stored outside. Photo's attached showing 1 tank of NaOH in use, pallets of feed and 1 pallet of salt, but no chemicals stored 2. During de-loading instructions for minimizing time before final storage are trained 3. Admittance of vehicles from outside are controlled by a security chain. Photo's attached	05-12-18	Evidence missing (photo's). 15/11: photos seen.	15-11-18
6.4.3	Minor	Not all accidents are recorded. Raised as minor, as isolated incident.	H&S related accidents are recorded (complete H&S incident documentation incl. root cause analyses and corrective action plan). Worker interviews confirmed above. Accident in May/June - 1 employee fell into the fish production compartment/tank. This is not recorded. TS is responsible person for employees' health & safety.	05-09-18	Closed	N/A	Root cause: We wasn't aware of that the incident was not recorded	The list about accidents has been updated. Future accidents and corrective actions will be recorded	05-12-18	Record form with list of accidents updated.	15-10-18
6.7.2	Minor	Disciplinary procedures are not documented. Raised as minor, as only documentation is missing.	Social policy is covered in the Employee Handbook. First time verbal warning, second time in writing and third time can get fired employees on fixed salaries. This is taken up in the Legislation. This is not documented in the Employee Handbook.	05-09-18	Closed	N/A	Root cause: Disciplinary procedures were not sufficient documented	According to our recent Employee handbook disciplinary procedures is already documented. Further the handbook p. 8 has been updated according to ASC requirements about written warnings p. 48 (handbook enclosed) Note: All employees are employed according to "Funktionærloven" so termination of employment relationship must be justified by the employee or company relationship (§2 b)	05-12-18	Employee handbook is updated.	15-10-18
6.8.1	Minor	It is not clearly documented how overtime is compensated; different employees give different explanations. Therefore, raised as minor.	Not more than 48hrs/week over a 4-month period of time (EU legislation). It is not clear if the employees work during the week on-duty. Minimum wage in Denmark is around 18.000DKr. per month. Salaries are all higher than that.	05-09-18	Closed	N/A	Root cause: The overtime rules were not sufficiently communicated	Sashimi Royal will during the yearly 1:1 dialogue clarify for every employee the overtime compensation rules.	05-12-18	Employees are informed.	15-10-18
6.8.2	Major	The alarm phone is held for 7 days in a row, additional to the regular 37 hours work-week. The 4-5 employees get the alarm phone approx. once monthly. There are many false alarms going off (up to every 15 minutes in the night), employees need to be stand-by without compensation, but this is taken up as such in their contracts. It is not clear how this overtime is compensated (different information is given). Raised as Major as it affects the employees' wellbeing.	Having the weekend or week alarm telephone is part of the job and taken up in the contract that it is additional to the 37hours work-week. Overtime payment is reduced to a minimum. Overtime is compensated by time. Weekend and evening stand-by job is taken up in the job description. Per alarm, there is paid extra (400 DKr.) if the employees need to come to the site and also if they can fix the problem from home.	05-09-18	Closed	N/A	The root cause is that due to starting up many errors in the alarmsystem must be corrected	This is already described in each contract. Now a meeting will be held on 22nd November 2018 with the participation of all employees participating in the standby alarm system. A copy of the meeting call is attached and a Google translation. The many alarms were due to an error and has been corrected now. In general errors in the alarm system are being corrected as soon as possible and to the least possible inconveniences for the employees. For documentation use the alarms for the last month have been counted (attached). Note: Only alarms with duration > 30 seconds will result in a telephone alarm (sms/call). Result: Weekend = 4 alarms. Normal workingdays between 16:00 and 06:30 = 11 alarms. As it is communicated to the employees feedback and improvements will be communicated regularly every week.	05-12-18	Evidence missing. 15/11: enough information that alarm system is improved.	15-11-18
6.9.2	Major	No reference to social practices in contract with outsourcing company. No contract with diving company. No reference to compliant social practices with cleaning company. Set as Major as there is no evidence that social practices are fully implemented by the subcontractors.	It is taken up in the Employee Handbook/Social Policy that temporary workers and service staff are employed under socially responsible terms. Seen contract with Team Vikarer, outsourcing company, dd 17-8-2018 - no reference to social practices. No contract with diving company. Interview with temporary employee showed no evidence of that there.	05-09-18	Closed	N/A	The root cause is that we assumed that the many visitors that we have signing up in our guestbook together with our contacts with neighbors in the small town that Hantholm is was sufficient	A folder is in process re. social practices and house rules for outsourcing companies. A draft "Medarbejderhåndbog for samarbejdsparterne_Draft.docx" is attached. The folder will be overhanded for signing to outsourcing company, diving company and cleaning company as part of the instructions of working at Sashimi Royal	05-12-18	No evidence. Not seen the folder with social practices. 15/11: social practices in place.	15-11-18
7.1.1	Minor	No evidence of pro-active engagement of community. Set as minor as single incident and no suspect that stakeholders are not heard.	The farm pro-actively arranges for consultations with the local community at least twice every year (bi-annually).	05-09-18	Closed	N/A	The root cause is that we assumed that the many visitors that we have signing up in our guestbook together with our contacts with neighbors in the small town that Hantholm is was sufficient	In factory manual we have added that bi-annually we have open house arrangements including local community. As documented in our guestbook, many tours at the facility have been conducted with locals and private acquaintances. With our aquaculture neighbors we regularly discuss professional issues.	05-12-18	This is enough information to close this NC.	15-10-18

ASC Audit Report - Traceability

10	Traceability Factor	Description of risk factor if present.	Describe any traceability, segregation, or other systems in place to manage the risk.
10.1	The possibility of mixing or substitution of certified and non-certified product, including product of the same or similar appearance or species, produced within the same operation.	Very low to negligible.	The company is in the certification process for the complete farm (100%). There are no other Seriola farms in the area, nor in the country. Batch number is based on harvest date and time.
10.2	The possibility of mixing or substitution of certified and non-certified product, including product of the same or similar appearance or species, present during production, harvest, transport, storage, or processing activities.	Very low to negligible.	The company is in the certification process for the complete farm (100%). There are no other Seriola farms in the area, nor in the country.
10.3	The possibility of subcontractors being used to handle, transport, store, or process certified products.	Only 1 subcontractor handling the fish, certified for ASC.	At harvest, fish are killed and bled and packed in tubs with ice and salt. The fish are transported by own truck to 2,5Km away from the farm, where fish are slaughtered, cleaned and packed at their subcontractor. Subcontractor is Filetfabrikken Hanstholm ApS Denmark in Hanstholm, 2,5Km from the farm (ASC-C-01894, valid until 2020-07-12 OBS - ONLY SALMON IN THE SCOPE up to now). No other subcontractors are used. Ownership is changing when the packed fish leave Filetfabrikken. The major client is Nordic Seafood (ASC C-00062 - No Seriola in the scope yet - this can only and will be extended when Sashimi Royal is certified).
10.4	Any other opportunities where certified product could potentially be mixed, substituted, or mislabelled with non-certified product before the point where product enters the chain of custody.	Very low to negligible. No other farms in Denmark.	The company is in the certification process for the complete farm (100%). There are no other Seriola farms in the area, nor in the country.

	Owned by client	Subcontracted by client
10.4.a Total number of sites owned/subcontracted by client producing the same species that is included in the scope of certification	1	0
Number of sites included in the unit of certification	1	0

	Site name(s)	Reason(s)
10.4.b Site(s) within UoC that has product to be excluded from entering the chain of custody	N/A.	
10.5 Detail description of the flow of certified product within the operation and the associated traceability system which allows product to be traced from final sale back to the unit of certification	After harvest, fish are transported to processing site (subcontractor, CoC certified) and there is only 1 client: Nordic Seafood (certified for ASC CoC). Fish leave the processing plant with handwritten label with date and time of harvest.	

10.6 Traceability Determination:	
10.6.1 The traceability and segregation systems in the operation are sufficient to ensure all products identified and sold as certified by the operation originate from the unit of certification, or	The batch number used is the date and time of harvest.
10.6.2 The traceability and segregation systems are not sufficient and a separate chain of custody certification is required for the operation before products can be sold as ASC-certified or can be eligible to carry the ASC logo.	No separate CoC needed for the farm.
10.6.3 The point from which chain of custody is required to begin	After harvest, the fish are transported in tubs with ice to the processing plant, where further processing and/or packing takes place. Change of ownership from Sashimi Royal to Nordic Seafood is when the packed fish leave the Filetfabrikken.
10.6.4 If a separate chain of custody certificate is required for the unit of certification	No separate CoC needed for the farm.

For Multi-site clients