Comments on Draft of Revised MEL AMS Ver. 2.0

	Commenters	# of Criteria	Opinions and Suggestion	Proposed Amendment	MEL's Correspondences
1	A	4.2.3	I cannot understand why the use of moist pelleted feeds is not allowed. Feeding with moist pelleted feeds for six months before shipment is essential, and quality of fish cannot be improved in three months.		Although regular use of moist pelleted feeds during the rearing period is not permitted, it is permitted to use under limited conditions, such as low water temperatures and quality control. The AMS Ver. 1.0 is valid for three years, which means a transition period. In addition, it is recommended to consider the improvement of the feeding system in that the transition measures to dry pelleted feeds will be provided. We also offer a partial certification, for instance, please understand that it is possible to adjust the unit of certification depending on applicants' conditions.
2	B	Others	The transition period is different between existing certified entities and the entities whose application have been received by CAB.		Every step and schedule for revision of AMS has been established in line with the GSSI re-benchmarking which is scheduled to begin this summer. We understand there may have caused some confusion for the entities whose application has already received by CAB. However, the situation of transition from moist pelleted feeds to dry pelleted feeds is similar between the two, and we do not believe that there is any difference in handling of the three-year transition period. We will take measures not to avoid significant disadvantages for both of them.
3	B	4.2.3	What exactly does the "transition plan to conversion" envisage?		Transitional measures are specified in the Appendix 2 of AMS Guidelines for Auditors Ver.2.0.
4	B	4.2.3	There are some producers which are difficult to convert to dry pelleted feeds. This revision deviates from MEL's policy of "certification suitable to Japan's aquaculture system."		Although the regular use of moist pelleted feeds during the rearing period is not permitted, it is permitted to use them under limited conditions, such as low water temperature and quality control, while considering actual production conditions in Japan. We believe that "a certification conforming to Japan's aquaculture system" should be established based not on current production methods in Japan but on the idea which supports the effort of aqua-producers that have the willingness to shift to sustainable aqua-production that takes into account the marine environment, ecosystem and society in the future including small scale production.
5	C	Others	The description in the Appendix 1 of AMS Guideline for Auditors Ver.2.0 should be clear.	・Proposed amendments to Annex 1 ・Terms of certification of unit and type	Reflect your proposal on the Appendix 1 of the AMS for Guidelines for Auditors Ver.2.0.
6	C	Others	Is there any quantitative measure for the audit with large number producers as described in the Appendix 1 of AMS Guideline for Auditors Ver.2.0?		Quantitative measures will not be provided, but if the number of sites is significantly large, special reviews should be conducted through procedures approved by the Standards Setting Committee and the Board of Directors.
7	C	4.2.3	"Specified conditions" should be explained in the Appendix.		Describe in the AMS Guidelines for Auditors Ver.2.0
8	C	4.2.3	Isn't it necessary to define the word of "continuously" quantitatively? Could it be interpreted as intermittent use?		Intermittent use is not permitted. Quantitative definition as proposed does not eliminate concerns.
9	C	Others	Will the Appendix 2 of the AMS Guideline for Auditors Ver.2.0 be updated in accordance with the revision of the AMS Ver.2.0?		That's right.
10	C	Others	We would like to confirm the meaning of the phrase "more than every five years for reviewing" in the AMS Introduction section.		This means that the standard will be reviewed every five years starting with the entry into force of the original standard of AMS Ver.1.0. Periodic review of standards should be conducted at no time beyond five years.
11	C	Others	The terms "certification unit," "certification unit type" and "unprocessed fish" should be added to the Terms and Definitions.		The definition of "unprocessed fish" will be added. The explanation of "certification unit" and "certification type" will be specified in the documents.
12	C	Others	The relationship between the Indicators in the AMS Guidelines for Auditors and the Compliance Indicators in the AMS.		The standards in the AMS Guidance for Auditors are an index for evaluating concretely whether the standard compliance Indicators in AMS are complied with, and multiple indicators are set for each compliance indicator of AMS.
13	D	4.2.3	The Criterion 4.2 states that "the impact of feed on natural resources shall be minimized", while the Standard 4.2.3 states that "unprocessed fish shall not be used as direct feed source." The impact on natural resources does not change whether the fish is round, unprocessed or processed, so it may not meet the Criterion 4.2.		Standard 4.2.3 does not only mean that the use of unprocessed fish as a direct feed leads to a negative impact on natural resources but also takes into account the potential of fish disease derived from feed and marine pollution against fish living in the vicinity of aqua-farms, so there is no contradiction as a standard for Criterion 4.2.

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14	E	4.2.3	In the indicator of 4.2.3 A, it was changed to "do not use unprocessed fish." A scientific basis should be provided for setting of this indicator. If it cannot, it should be deleted.		Although the environmental impact of direct use of unprocessed fish can be assessed on the basis of scientific data, it is apparent not to be able to obtain international understanding. Therefore, feeding of unprocessed fish cannot be permitted. MEL has decided to promote the conversion to dry pelleted feeds because it is necessary to implement the improvement measures caring about not only the effect on farmed fish, but also the effect on the marine environment and ecosystem around the farm.
15	E	4.2.3	The scientific basis for prohibiting the use of feed derived from the same species and same genres should be provided. In addition, its relationship with the Criterion "4.2 Impacts on natural resources" is unclear.		Although your comments are valid, the Essential Component of GSSI Benchmark Tool prohibits the use of feed derived from fish protein of the same species and same genus, which must be incorporated into MEL standard to maintain GSSI's continued recognition. There are two main perspectives on forbidding intraspecies feeds: the risk of prion disease agaist people who eat farmed fish and the spread of fish diseases that intraspecies-used feeds may carry. There is no basis for denying the former risk. On the other hand, regarding the latter risk, although the scientific validity seems to be questionable, a case in Australia demonstrated this concern in the past. Since the spread of disease around aqua farms may affect natural resources, it is used as a criterion for Standard 4.2. The standard will be reviewed in the future if scientific knowledge of these risks of concern is obtained.
16	F	4.2.4	The scientific basis for the requirement for the use and reduction of low fish meal feed should be provided.		The use of low fish meal feed and reduction of fish oil use are issues that must be addressed as one of the measures to minimize the impact on natural resources and also shared internationally. On the other hand, if it is likely that using a plant-based material as an alternative protein source would significantly impair fish growth or cause fish disease, quantitative measures for a low fish meal need not be specified because it would lack consideration for the health and welfare of farmed fish. MEL requires the reduction of fish meal within the range where farmed fish grow healthily and considers to be an issue to be tackled for realizing sustainable aquaculture production in the future.
17	G	4.2.1	The effluent standard of land-based aquaculture facilities should be the standard value in accordance with the original effluent standard.	According to the uniform emission standard based on the Water Pollution Control Law as below: BOD (fresh water): less than and equal to 160 mg/L (daily average 120mg/L) COD (sea water) : less than and equal to 160 mg/L (daily average 120mg/L) SS: less than and equal to 200 mg/L (daily average 150mg/L)	It is difficult to set a uniform criterion on the premise that a numerical value of water drained does not exceed that of water taken. If the numerical value of water drained complies with the standard values in accordance with environmental standard and standard of fisheries water, it could be acceptable. At the time of the initial audit of GSSI recognition in 2019, the standard values of Japan's Water Pollution Control Law could not be approved. Therefore, the standard values for effluent were set by referring to the U.S. EPA's standard for effluent from aquaculture farms, such as SS, 50 mg/L, for instance.
18	H	4.2.3	What are the specified conditions for moist pelleted feed?		It will be described in the AMS Guidelines for Auditors Ver.2.0.
19	I	4.2.3	The use of moist pelleted feeds should be described in such a way that it is acceptable to use or can be made gradual transition into dry pelleted feeds. What does "in principle" mean?		The revised GSSI Benchmark Tool Ver.2.0 does not allow the use of raw fish or unprocessed fish as aquaculture feed. The basic approach of MEL is to understand such concept and to recommend the conversion to dry pelleted feed in the future. Transitional measures are described in the Appendix 2 of AMS Guidelines for Auditors Ver.2.0.
20	I	4.2.3	What are the specified conditions for moist pelleted feeds?		It will be described in the AMS Guidelines for Auditors Ver.2.0.