GREENPEACE Briefing

Assessment of the GLOBALGAP Aquaculture Certification Programme

January 2010

1. Seafood Certification Schemes – are they adequate markers of sustainability?

A variety of seafood certification schemes have developed over the past decade, all claiming that the fish they certify have been sustainably caught or farmed and that they are the best option for consumers to purchase.

Greenpeace is of the opinion that no fully credible certification system for sustainable wild-caught or farmed seafood currently exists. So far, the challenges facing our oceans are far from being tackled and the fundamental principles of precautionary and ecosystem-based approaches are not yet central to fisheries management or aquaculture production.

In order to more clearly explain Greenpeace's position, seafood certification schemes have been assessed systematically with the help of a tool[1] created by a certification specialist (with experience in ethical certification systems such as the Forest Stewardship Council). The tool was developed for Greenpeace to establish how well various certification programmes can help to deliver Greenpeace's vision for healthy oceans – a global network of marine reserves covering 40% of the world's oceans, with sustainable and fair use of the remaining 60%. The tool also allows detailed comparisons of various certification programmes with each other as well as with industry best practice. Although it was developed with fisheries and aquaculture certification in mind, the tool has been based on best practice within the broader certification industry. A public version of the tool is available on request from Greenpeace.

2. History and framework of GLOBALGAP

GLOBALGAP is a private sector body that sets voluntary standards, or Good Agricultural Practices (GAP), for the certification of agriculture, including some aquaculture, products around the globe.

GLOBALGAP began as EUREPGAP in 1997 as an initiative by retailers from the Euro-Retailer Produce Working Group (EUREP). British retailers and supermarkets in continental Europe were the key players in developing the standards, in response to the growing concerns of consumers about the safety, animal welfare, environmental and social impacts of their food. Over the next ten years EUREPGAP gained in global significance and was re-branded GLOBALGAP in 2007.

The certification is a business-to-business guarantee of a standard rather than a consumer standard; however, GLOBALGAP standards are increasingly being citied by producers and retailers as evidence of a sustainable sourcing policy for farmed fish, so it has become an issue of public interest.

Greenpeace has not had any formal involvement with the GLOBALGAP scheme to date. GLOBALGAP plans to provide formal comment to Greenpeace on this briefing, following consultation and discussion at its Sector Committee meeting at the end of February 2010. This briefing will be updated with any changes or clarifications to GLOBALGAP policies or standards at this time.

3. Strengths of the GLOBALGAP certification programme

3.1 Strengths in governance and operations

3.1.1 Independence of certifiers

GLOBALGAP is independent from its Certifying Bodies (those that assess and certify farms and supply chains to the GLOBALGAP standards), and the Accreditation Body (which monitors the work of the Certifying Bodies), and they all appear to follow acceptable industry practice to apply and monitor GLOBALGAP's standards.

3.1.2 Well documented rules and regulations

All GLOBALGAP operational documents are of high quality and available online, and these provide a clear set of rules and regulations for suppliers, certifiers and auditors to follow.

3.1.3 Accessibility to small-scale operations

GLOBALGAP has a number of policies and specific projects that aim to make its certification programme more accessible to small-scale operations. There are provisions within the General Regulations[2] for legally recognized producer groups of farmers, such as Co-operative groups (Co-ops), to be certified as a group, which significantly reduces external certification costs such as inspection charges and overhead costs.

GLOBALGAP has developed a smallholder manual to help farmers establish internal control systems, which includes operational procedures and recording forms to be used as templates for farmer groups.

GLOBALGAP is strengthening the stakeholder involvement of smallholders by incorporating their needs – they now have more opportunities to give systematic feedback into the certification application process and further development of the standard. For example, in May 2007, GLOBALGAP started the Smallholder Ambassador/Africa Observer Project to provide feedback from smallholders to the Sector Committees.[3]

3.2 Strengths of aquaculture standards

This assessment is for the aquaculture standards only. Currently, standards are available for shrimp,[4, 5] salmon,[6, 7] pangasius[8, 9] and tilapia.[10, 11]

3.2.1 Standards are performance based

The GLOBALGAP standards are performance-based, i.e. certified farms go beyond just having the right documents and systems in place and must demonstrate proof of application at the initial farm inspections, followed by yearly internal self-assessment and external farm visits, announced and unannounced, by trained auditors. This puts the programme ahead of others such as International Organization for Standardisation (ISO) certifications.

3.2.2 Detailed requirements for management and monitoring

For fish and shrimp, the standards (section AB 7 for each species) require environmental impact assessments (EIA) and environmental risk assessment (ERA) to be developed and continuously updated, based on the ISO 14001 standard or equivalent. These must set out strategies to minimize all environmental impacts (identified risks, such as pollution or water contamination) and to justify that the site in question is suitable.

An effective Environmental and Biodiversity Management Plan must be in place that incorporates regular environmental monitoring and an Environment Contingency Plan must address the actions to be taken in the event of situations that may threaten the environment, such as loss of power, water, flood or storm damage, fire, or chemical or effluent spillage.

Legal compliance must also be demonstrated, and records must be kept of all management and monitoring decisions and actions.

3.2.3 Strong traceability and record keeping requirements

GLOBALGAP standards required detailed record keeping for all aspects of the day to day running of the farm (detailed throughout all standards). Traceability requirements are detailed both within the Chain of Custody standards,[12] as well as within specific standards for farmed fish and shrimp species. Fish and shrimp must be traceable throughout their lifecycles (eggs to adults), with regard to the source of eggs and

larvae, where and how they were grown and fed, all medical treatments used, as well as killing methods and transportation.

3.2.4 No restocking with wild-caught or genetically-modified organisms

The standard does not allow any farms to be restocked with eggs or juveniles taken from the wild. This ensures that farms do not cause any of the environmental problems associated with the collection of fish and shrimp eggs or juveniles from the wild, such as overfishing or bycatch.

The standard does not allow any genetically modified (GM) farmed species to be certified, which protects the environment from contamination with GM organisms.

3.2.5 Tight control of health and welfare

The health and welfare of fish and shrimp are specifically addressed (section AB 5 for each species) in great detail throughout the standards. This should result in minimising disease.

3.2.6 Tight control of escapes to the wild

Standards (various sections including AB 1, 5 and 7 for all species) require detailed operating procedures to be in place within Contingency Plans to ensure there is no escape of farmed stock into the sea or local watercourses. In addition, equipment must be well maintained and farms must be designed to prevent escapes under both normal conditions and in emergencies such as flooding. Records detailing inspections and maintenance must be kept, and any escapes must be recorded and reported to the authorities.

3.2.7 Protection of mangroves and other sensitive areas

GLOBALGAP will not certify new farms (those built after April 2008 for shrimp, or April 2009 for pangasius and tilapia) built in mangroves or other sensitive areas, and there are some strong standards for these farms with regard to mangrove protection. For example, criteria include:

- New ponds, farm sites or related facilities must NOT be established within a designated national protected area (PA), PAs with IUCN categories Ia through to IV,[13] or areas defined under international conventions (such as RAMSAR or World Heritage). For those within PA of IUCN category V or VI, the consent of PA management is required.
- New ponds, farm sites or related facilities must NOT be established within areas that were previously within a mangrove ecosystem, within the natural inter-tidal zone, or a High Conservation Value Area.
- The removal of mangrove vegetation is only allowed for channels or piping for sites above the inter-tidal areas, and when official permits of the public sector have been granted and when a rehabilitation plan is part of the permit.
- Vegetative buffer zones and habitat corridors must be maintained to minimize the effect of site operations on the environment.

Unfortunately, established farms built prior to these dates can be certified. Please refer to the section on standards weaknesses in section 4.2.4 for details and comments on this.

4. Weaknesses of the GLOBALGAP certification programme

4.1 Weaknesses in governance and operations

4.1.1 Poor stakeholder involvement in governance

Governance is limited only to those stakeholders that fall within the categories of suppliers/producers and retailers.[14] The Board makes decisions based on a structured consultation process. Various Sector Committees discuss and decide upon product and sector specific issues. The Board and each of the Sector Committees are composed of an equal number of producer and retailer representatives, who are elected by other supplier and retailer GLOBALGAP members. An independent chairperson chairs the Board.

No documentation was found for any appeal mechanisms available to stakeholders in order to deal with the decisions made by the board or Sector Committees.

4.1.2 Inadequate and non-transparent stakeholder involvement in standard setting

Although GLOBAL GAP invites input, the decision-making process is not transparent, does not ensure that the balanced views of all stakeholders is reflected in the standard, and there is no mechanism in place to prevent any one stakeholder group from dominating.

GLOBALGAP is not a member of the ISEAL (International Social and Environmental Accreditation and Labelling) Alliance that has developed a code of good practice for social and environmental standardization. However, GLOBALGAP does follow ISEAL's basic requirements for a notification period before draft standards are made public and two rounds of public consultation of at least 60 days each.[15] The development of new standards and revision of current standards are announced on the website, where process can also be tracked; however, it is not clear to what extent GLOBALGAP actively seeks input into this process.

GLOBALGAP also invites public comment on its processes and standards through its website and has also sought input from NGOs including IUCN Netherlands, Oxfam Novib, and WWF. However, despite the invitations to input into standards, it is not clear to what degree their input is reflected in the standards.

GLOBALGAP claims to "prepare individual feedback to the parties who submitted comments as well as a summary of how each comment has been addressed during the further processing of the standard/module. This summary will be available on the website." However, this feedback is not made public and to date the summaries have not appeared on the website. GLOBALGAP also states that the board will incorporate comments "when applicable", unless they are sector committee level specific, at which point they are agreed by consensus, or failing this, a majority vote. That is, the final decision on this is made by a Board or Sector Committee composed only of retailers and producers.

As GLOBALGAP expands, it is proactively working to improve stakeholder input, but this is mainly from producers/suppliers. This includes strengthening small-scale stakeholder involvement (see section 3.1.3 above), and the voluntary establishment of National Technical Working Groups by GLOBALGAP members to "develop a series of national interpretation guidelines as well as address identified specific local adaptation and implementation challenges."[16]

There is also a lack of transparency in the assessment process (see section 4.4 below).

4.2 Weaknesses in aquaculture environmental standards

Some components of the environmental standards are relatively strong (see section 3.2 above), but many critical factors, such as sourcing of sustainable fish feed, are not addressed. All standards are compromised by both the scoring system and some overlapping but inconsistent criteria or Control Points.

4.2.1 Standards are compromised by the scoring and inconsistencies

The assessment poses a series of Control Point questions accompanied by compliance criteria for interpreting the answer.[17] The possible answers are: compliance (yes), noncompliance (no) or Not Applicable (N/A). Where the answer is N/A, a justification must be presented. An answer of N/A cannot be given to those Control Points where the Compliance Criteria specify "No N/A". Control Points are divided into Major Musts, Minor Musts and Recommendations. 100% compliance is required for Major Musts, and 95% compliance for all the Minor Musts within each module. Audits must be done, but compliance is not required for criteria listed only as Recommendations. Evidence of compliance must be given for all Major Must Control Points.

For those factors that are addressed, it is not always easy to determine where there are gaps as there are minor and recommended criteria that seem to overlap with other major ones and there are some apparent contradictions. Examples of this problem are described below.

4.2.2 No requirement for use of the precautionary approach

Using the Precautionary Approach requires that a cautious approach be taken when there is a risk that a particular activity may cause harm to human health or the environment, when making management decisions even if the full extent of potential harm has not yet been fully established scientifically. This approach recognises that such proof of harm may never be possible, at least until it is too late to avoid or to reverse the damage done. It also reverses the burden of proof – those carrying out any risky activity must establish that the proposed activity will not (or is very unlikely to) result in significant harm.

There is no requirement for the use of the precautionary approach in the management and monitoring of the environmental or social impacts of the farms.

4.2.3 No requirements to use sustainably sourced fish feed

Feed used on farms must be obtained from a GLOBALGAP approved source; however, the standards for feed certification[18] do not include sustainability criteria, other than recommendations for the reduction of fishmeal & oil (amount used per tonne of fish) in salmon feed (salmon AB 6.1.5).

This means that plant components may be sourced from farms that use destructive practices such as forest destruction to grow soya in the Amazon, while fish components may be sourced from overexploited and/or destructive fisheries. In addition, the standard does not exclude feeds that contain GM components – it only requires that any salmon feed claiming to contain no GM components must be certified as such (salmon AB 6.1.3). For some reason this requirement is not in the standards for shrimp or other fish.

4.2.4 Weak requirements for mangrove protection and regeneration

Although new farms for shrimp, pangasius and tilapia cannot be established in mangrove areas (see section 3.2.7 above), established shrimp farms built between 1999–2008 or pangasius and tilapia farms built between May 1999–April 2009 can be certified as long as they are in the process of being retired and the area rehabilitated. Those built farms prior to 1999 appear to be exempt from this rule and can be certified – there is no specific mention of how these are dealt with in the standards.

In addition, there are some ambiguities in the criteria that could further weaken the standard. For example, one Control Point (shrimp SP 5.3, pangasius PN 5.3, tilapia TA 4.3) states that farms "must show evidence that they are in process of being retired, rehabilitating area and if necessary compensating surrounding communities." This is considered a Major Must but another Control Point (shrimp SP 5.8, pangasius PN 5.8, tilapia TA 4.8) appears to contradict this as it asks: "Is there a Rehabilitation Plan for when production at site finishes?" and it is only a Minor Must requirement. It may be that this relates to farms built prior to 1999. If it does in fact refer to older sites, making this Control Point only a Minor Must means that there are very different requirements depending on when farms were established. Examples of this, from shrimp standards are:

> SP 5.3 Farms established between May 1999 and April 2008 within mangroves, the natural inter-tidal zone or a High Conservation Value Area must show evidence that they are in process of being retired, rehabilitating area and if necessary compensating surrounding communities. Certificate is valid for maximum of 3 years for the process to be completed, after which it is removed and new location if any outside these areas considered for certification. – Major Must
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> SP 5.8 Is there a Rehabilitation Plan for when production at site finishes? There is written Rehabilitation Plan containing at least objective, means, activities, expected output and financing. When operations in mangroves or other sensitive ecosystems. No N/A – Minor Must.

While it is commendable that GLOBALGAP promotes mangrove regeneration, it should do so for ALL farms operating in areas that were once mangrove habitats or other sensitive areas. Greenpeace does not believe that these farms should be considered sustainable, and they should certainly not be given the same level of recognition as farms that are not built in mangrove areas or other sensitive areas.

4.2.5 Weak requirements on discharge of waste and effluent, and water conservation

The quality of water input into the farm system is tightly controlled, while output, unfortunately, is not. Although there are many requirements for dealing with waste and pollutants, it is mainly the legal requirements that are Major Musts, and some key issues are only addressed by Control Points that are considered Minor Musts or Recommendations. In addition, there are inconsistencies in the standards and scoring which make it difficult to assess how well these impacts are actually monitored and prevented.

There are no specific requirements on preventing discharge of waste & effluent into areas of high ecological sensitivity. This is a serious concern when shrimps, tilapia and pangasius farms in sensitive mangrove areas can be certified – there should be much stronger requirements in these cases.

Some key examples of the weakness of the standards are:

1. In the All Farm level standards (AF 4), identifying all sources of waste and pollution is only a Minor Must, while having an action plan & its implementation are only recommended criteria.[19]

2. In the shrimp, pangasius and tilapia standards, basic requirements such as not releasing raw sewage into open water and avoiding contaminations of aquifers and surface fresh water bodies by preventing seepage, are not Major Musts, despite the statement in another Control Point (see AB.7.4.1 below) that "It is the responsibility of producers or producer organizations to ensure any product does not result in unacceptable enrichment of waste water."

> AB.1.2.8 Are the discharges positioned in such a way that they do not drain effluent into stagnant water or cause erosion? The outfalls must be designed and positioned in such a way that it is not possible to drain effluent into stagnant water or cause erosion. – Recommended
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> AB.7.3.1 Are all human solid wastes from toilets collected and disposed of through sanitary sewage disposal systems without contamination of the production area and not released directly into open water systems as untreated raw sewage? The records of waste disposal and collection facilities for wastes must be in place. – Minor Must
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> AB.7.4.1 Are local limits [of Nitrate and Phosphate Levels in Drain Water] in accordance with national and international legislation as implemented and enforced by the relevant competent authority? It is the responsibility of producers or producer organizations to ensure any product does not result in unacceptable enrichment of waste water (nitrate and phosphate for example). Producers and workers must be able to demonstrate compliance and knowledge of legislation at interview. – Major Must
>
> SP 5.6, PN 5.6, and TA 4.6 Are measures taken to control seepage and avoid contaminations of aquifers and surface fresh water bodies? Seepage and contaminations of aquifers and surface fresh water bodies is prevented with adequate measures. Cross reference with AB 7.1.6 – Minor Must

3. In the shrimp, pangasius and tilapia standards, one Control Point (AB.8.1.9) requires monitoring and minimising the impact of emissions through water, but another (AB.8.1.6) does not require, but only recommends, that benthic surveys and sediment sampling take place. Such a significant component of the aquatic environment should not be left out of the monitoring requirements.

> AB.8.1.6 Are samples taken in sediment of the recipient water body once per fish generation for diversity of the macrozoobenthos? Benthic life of the recipient water body (where net pens or farm effluents are located) should not be significantly negatively affected. Therefore, monitoring of benthic life and monitoring of possible accumulations of sediment should take place. The records and reports for benthic surveys and sediment must be in place. – Recommendation
>
> AB.8.1.9 Is the impact of emissions through the water on biodiversity monitored and minimized as part the environmental management plan? EMP must include managing impact of water use and exchange on biodiversity. – Major Must

4.2.6 Inadequate disease prevention and minimal drug use

Disease prevention and treatment are certainly addressed in detail for fish and shrimp (AB 5 for each species); however, there are no requirements for minimising drug use other than forbidding the use of natural or synthetic hormones or antibiotic agents for growth promotion (AB 5.3.3 for each species). Legal requirements are strong, but there are still some criteria that are only Minor Musts.

Also, stocking density needs to be set only according to legislative, customer, or scientific standards (as reference, if no legislation or customer requirements exist), not to specified limits that could maximize welfare and minimise disease (shrimp, pangasius, and tilapia AB.5.2.10, salmon AB 5.2.19). Legal or customer-specified stocking densities vary considerably and are often set higher than those recommended by animal welfare organisations.[20]

4.2.7 Poor standards for minimizing chemical use and waste

The criteria on chemicals (AB 2 for all species) are focussed on reporting, legality, safe use, storage, and disposal – there are no requirements to minimise their use.

Salmon farms should have a Farm Waste Management Plan to prevent the contamination of the air, soil and/or water with harmful pollutants (salmon AB.7.3.1), and a Waste and Pollution Action Plan, which is implemented to reduce waste and pollution (salmon AB.7.4.1), but these are only minor musts. For some reason other fish and shrimp standards do not include these requirements – again, this is a particular concern where these farms are sited in mangroves or other sensitive areas.

4.2.8 Poor protection of biodiversity

Although sections AB 7 for both shrimp and fish cover environment and biodiversity management, some key criteria are only considered Minor Musts. For example:

1. For all species being farmed, making a commitment to a formal Environmental & Biodiversity Policy (supported by codes of practice, management protocols, management practices, record keeping and regulatory compliance certificates) is a Minor Must Control Point only (AB.7.1.1).

2. Rules for dealing with any wildlife that might attempt to feed at the farm (such as birds and seals) are dealt with by predator control standards. However, for shrimp, pangasius and tilapia (AB.7.5), these are only Minor Musts, even with regard to following local legislation, keeping records, and the killing of listed, protected or endangered species. For salmon, the standards (AB 7.8) are more detailed and slightly stronger with legal requirements being Major Musts, but other Control Points are only Minor Musts or Recommended, and do little to ensure protection of wildlife.

4.2.9 No requirements for minimising energy use

Energy efficiency is only a recommendation (all species AB.7.2.1). There are no requirements for minimising or reducing energy use.

4.3 Poor socio-economic standards

GLOBALGAP has detailed social criteria in its shrimp, pangasius and tilapia standards; however, although every Control Point has to be assessed by the auditor, there is actually no requirement to pass any of the criteria. It is simply a reference for business customers to decide for themselves if the social criteria are good enough for their requirements. For salmon, there is no equivalent requirement.

This means that farms can be certified that do not address even the basic elements of respect for human rights, respect for the International Labour Organisation (ILO) conventions, or involvement of local stakeholders in the management of the farm. This is a glaring omission for any certification dealing with aquaculture where human rights abuses have been a serious problem, especially for shrimp farms in Asia, Africa and South America, and for salmon farms in Chile.

There are detailed health, safety and welfare requirements for All Farms (AF 3), and although many are Minor Musts, they should at least provide some protection for workers; however, even the presence of at least one person trained in First Aid (AF.3.2.4) and complete and maintained first aid kits (AF.3.3.4) on farms are only Minor Must requirements.

4.4 Unknown quality and consistency of assessments

This is a major issue with regard to the GLOBALGAP certification. A list of all certified farms and the certification assessment reports and regular audits are not made available to the public. Local stakeholders are not identified and consulted before audits. There are no opportunities for broader stakeholder groups to input into the assessments, or to check on the quality of assessments and audits being performed. Finally, there is no appeal mechanism to allow external stakeholders to appeal certification decisions.

Transparency in this area is a key issue for certification programmes, as it shows how well the standards are actually applied, and proves the competency of the certification process and all bodies involved. Poor assessment and application of standards has been an area of major concern in other certifications, such as for the seafood certification managed by Friend of the Sea.[21]

5. Summary and Conclusions

In its current form, Greenpeace does not regard GLOBALGAP certification to be a guarantee of sustainable aquaculture products. The certification certainly has strengths with regard to its governance and operations,

and there are some potentially strong environmental standards that do not allow restocking with wild-caught or genetically modified organisms, and require tight control of animal health and welfare and of farmed species' escapes into the wild. They also help to reduce the destruction of mangroves and other sensitive areas caused by building new farms. However there are also some substantial gaps in the environmental standards, particularly with regard to use of sustainable fish feed, and the socio-economic standards merely recommendations, not required for certification. The standards are compromised by the scoring system and by a variety of inconsistencies. Any confidence in these standards is further undermined by the unknown quality and consistency of assessments. Finally, stakeholder involvement outside the limits of farmers and retailers requires considerable improvement.

In its current form, retailers and other fish buyers should consider GLOBALGAP as a minimum standard, but must take further action to ensure that all aquaculture products are sustainably produced.

Endnotes and references

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[13] IUCN Protected Areas Categories System:

Ia Strict Nature Reserve
Ib Wilderness Area
II National Park
III Natural Monument or Feature
IV Habitat/Species Management Area
V Protected Landscape/ Seascape
VI Protected area with sustainable use of natural resources

For more information see: IUCN (2009) Home> About IUCN> Our work>Programmes> Protected Areas> Task forces> Categories. IUCN website. IUCN,Gland, Switzerland. Accessed July 2009 at: www.iucn.org/about/union/commissions/wcpa/wcpa_work/wcpa_strategic/wcpa_science/wcpa_categories/

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