

To: katherine.bostick@wwfus.org
From: fair-fish <hps@fair-fish.ch>
Date: Mon, 9 Mar 2009 22:39:50 +0100
Subject: **Critical comments to the draft criteria of the Salmon Dialogue**

Dear Katherine

We take the opportunity to submit some critical comments to the next meeting of the Salmon Dialog.

As our comments are addressing general reflections on aquaculture, we submit them in copies to other Aquaculture Dialogues simultaneously.

Kind regards

Heinzpeter Studer
Director
fair-fish association

Critical comments to the draft criteria of the Salmon Dialogue

Is there a true need for another certification scheme?

There exist already quite a variety of certification schemes for aquaculture:

- Friend of the Sea (FOS) with a total of certified production of about 350 tons per year

- several bio (eco) labels with a total production of less than FOS

Besides that, there are

- the privately built body GlobalGap setting voluntary standards for good practices in agriculture (including aquaculture) and

- GAA founded by shrimp aquaculture companies which is not a third party certification scheme.

Thus, the problem in aquaculture is not a lack but an oversupply of labels which confuses consumers, producers and vendors. Is there a true need for new certification schemes like the ones proposed by the WWF Aquaculture Dialogues and the presumptive Aquaculture Stewardship Council (ASC)?

On the other hand there is a huge need for a new scheme which yields additional values.

The already existing schemes are of poor performance in 2 critical fields:

- fish in/fish out ratio above 1.00 is not sustainable at all

- fish welfare is no criterium of existing schemes (or, with most eco-labels, not a very strong one)

A new scheme makes sense only if it demands strong achievement in these 2 fields.

For this purpose, WWF and its dialogue partners should not join forces only to define a level of improved status quo but rather to motivate science

- to define the essential animal welfare criteria with which a certified plant will have to comply
- to find out if and to what extent fish protein in feed can be replaced by adding artificial amino acids to vegetable feed components or by terrestrial slaughterhouse wastes - the best solution being in any way reducing the farming of carnivore species, but this is perhaps beyond the believe of a Salmon Dialogue...

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Heinzpeter Studer
Director

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