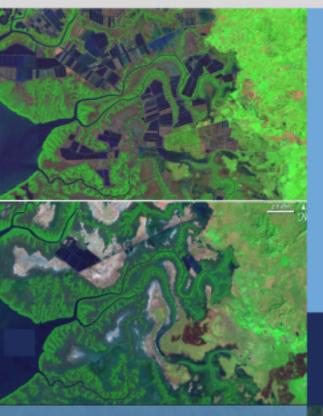
ENVIRONMENTAL LAW INSTITUTE



Gold Standard Evaluation: Whole Foods Market Aquaculture Purchasing Standards





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Whole Foods Market recently published two purchasing standards for aquaculture products, covering (1) salmon and (2) other finfish and shrimp. The standards require all Whole Foods suppliers to engage in responsible practices to avoid environmental degradation. The standards are based on the best available science and cover a broad array of impacts of aquaculture production, ranging from treatment of fish wastes to the use of parasiticides (substances used to destroy parasites). Suppliers will be audited regularly for compliance with the standards.

By publishing these standards, Whole Foods has taken a commendable step toward reducing the environmental and social impacts of aquaculture production and demonstrates that sustainability – not current industry practice – is the benchmark for responsible aquaculture practices. A comparison of the Whole Foods purchasing standards against the *Gold Standard for Aquaculture Ecolabel Design* recently published by the Environmental Law Institute (ELI) and The Ocean Foundation (TOF) reveals several ways in which Whole Foods could improve its standards. ELI and TOF offer the following recommendations to improve the credibility of its quality standards for aquaculture:

- Address all impacts of production and ensure that its existing standards are fully sustainable. Addressing all of the impacts of aquaculture identified by the UN Food and Aquaculture Organization would significantly strengthen the Whole Foods standards. Existing standards can be improved by using quantitative criteria, and future standards can be improved by adopting an independent technical advisory board to ensure that standards are socially, environmentally, and economically sustainable. These measures would ensure that the standards will produce meaningful improvement at the farm.
- *Publish procedures for setting standards, certifying producers and processors, and dispute resolution*. Without clear procedures, the Whole Foods standards lack the transparency, participation, and accountability necessary to assure credibility. In addition to clarifying its processes, we recommend that Whole Foods publish information about the structure, composition, and specific responsibilities of its seafood quality standards team to provide a context for evaluation of the team's actions.
- Actively incorporate all interested stakeholders, both in developed and developing countries. We recommend that Whole Foods broaden its stakeholder engagement to include the supply chain, environmental and community/social NGOs, wild-capture fishery representatives, and independent experts such as academics and multilateral organizations. Creation of a public forum for stakeholder objections to its standards before they are finalized would also strengthen credibility.

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In *Gold Standard for Aquaculture Ecolabel Design*, the Environmental Law Institute (ELI) and The Ocean Foundation (TOF) described a credible institutional design for aquaculture ecolabels. Ecolabels are voluntary systems that certify and label products that meet standards for environmental and social performance. The *Gold Standard* can also be used to evaluate purchasing standards, including the Whole Foods Salmon and Finfish and Shrimp standards. Because some aspects of comprehensive ecolabel design are inapplicable to purchasing standards, this chart sets forth only those elements of the *Gold Standard* that are relevant to the Whole Foods effort. For more detailed information, please download the *Gold Standard* report at http://www.elistore.org/reports_detail.asp?ID=11297.

Scope	WF: Salmon	WF: Finfish + Shrimp
Develop a written scoping document	✓	\checkmark
Address all significant impacts of production and processing		
Incorporate social, environmental, and economic stakeholders		
Incorporate stakeholders from developed and developing countries		
Adopt sustainability as the baseline for stringency	 ✓ 	✓

Governance	WF: Salmon	WF: Finfish + Shrimp
Technical Board		•
Create a standing, independent technical advisory board		
Authorize the TAB to provide objective measures of sustainability		
Authorize the TAB to create sub-panels		
Objections Panel		
Create an independent objections panel		
Allow secretariat to review and address grievances prior to appeal to panel		
Allow stakeholders to challenge procedure and substance of standard-setting and		
certification decisions		
Allow external organizations to object even if they are not members		

Standard-Setting	WF: Salmon	WF: Finfish + Shrimp
Comply with the ISEAL Alliance Code of Practice		
Use explicit standard-setting processes		
Use the TAB to determine stringency of criteria and indicators		
Base standards on both process and performance	✓	✓
Develop indicators on a species or species-group basis	✓	✓
Centralize development of principles, criteria, and indicators	✓	✓
Allow secretariat to develop guidance		

Implementation	WF: Salmon	WF: Finfish + Shrimp
Unit of Certification		
Establish individual facilities as the unit of certification	✓	✓
Provide for small-scale producer and group certification		✓
Provide for provisional certification prior to construction of new facilities		
Develop chain-of-custody certification	✓	✓
Certification Body		
Use independent, third party certification assessment	✓	✓
Establish protections for certification body independence and consistency		
Assessment Process		

Create credible, explicit procedures for certification		
Use preassessment, assessment, and review for certification		
Carry out confidential, streamlined preassessment		
Develop credible assessment processes that require on-site consultation		
Allow limited conditional certification		
Audit producers and processors annually	✓	✓
Collect performance data and report to secretariat	✓	✓