



Gold Standard for Sustainable Aquaculture Ecolabel Design

Summary Report



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Executive Summary

The aquaculture industry is on the rise: since 1950, aquaculture production has grown 8.8 percent per year and shows no signs of slowing. In 2004, global production stood at 59.4 million tons, with a market value of \$70.3 billion.¹ Proponents claim that this “blue revolution” reduces pressure on depleted wild fish stocks, provides a source of sustainable income generation for developing economies, and serves as an important food source to address protein deficits in developing regions. Unfortunately, these claims are undermined by serious environmental and social impacts caused by current aquaculture production practices. These impacts range from dependence on wild feedstocks to trade imbalances, and each must be addressed before aquaculture development can be considered sustainable over the long term.

The Marine Aquaculture Task Force has noted that “eco-labeling, and certification have the potential to significantly improve the sustainability of aquaculture production practices.”² Ecolabels are intended to leverage consumer demand for sustainable products to provide incentives for adoption of improved environmental practices by producers. Certified producers can market their products with the ecolabel, indicating to consumers that the products meet certain production standards. Producers benefit from increased access to markets and price premiums for labeled products. This simple idea has been implemented through ecolabels in a wide array of industries ranging from forestry to capture fisheries. While the theory behind ecolabeling is the same from industry to industry, each label’s institutional design differs, as does its success on the ground. Design differences affect the label’s

credibility and pragmatic benefits: labels must be properly designed to ensure that they produce their intended benefits.

A number of ecolabels have already been developed in response to increasing demand for an aquaculture label, and more are forthcoming in coming months and years. However, existing and planned labels all focus on incremental improvements to production processes rather than on sustainability. In these labels, sustainability is more a buzzword than a guideline for implementation. Moreover, an independent review has revealed that all existing ecolabels lack credibility due in part to a lack of institutional controls and inadequate consideration of key impacts of production and processing. In addition, it is not clear that these efforts have resulted in improvements in environmental or social practices on the ground.

The Environmental Law Institute (ELI) and The Ocean Foundation (TOF) seek to introduce a new paradigm for ecolabeling in which sustainability—not feasibility—is the basis for certification. Sustainability is a high bar—it seeks economic development that does not degrade natural systems or undermine basic human needs for either this generation or future generations.³ Creation of an ecolabel that meets these disparate economic, environmental, and social goals requires careful and flexible institutional design to enable the evolutionary development of certification standards.

This Gold Standard describes a comprehensive framework for the design of an aquaculture certification that is based explic-

1. FAO, *State of World Aquaculture 2006* 6 (2006).

2. Marine Aquaculture Task Force, *Sustainable Marine Aquaculture: Fulfilling the Promise; Managing the Risks* 110 (2007) [hereinafter *Sustainable Marine Aquaculture*]. The Marine Aquaculture Task Force is a diverse panel of experts with scientific, regulatory, business and policy-making backgrounds. It was convened by the Woods Hole Oceanographic Institution, with support from the Pew Charitable Trusts, to develop a suite of protective, science-based standards to assure that aquaculture development poses minimal threats to the ocean environment.

3. See John C. Dernbach, *Synthesis, in Stumbling Toward Sustainability* 1, 5–6 (2002); Michelle Allsopp et al., *Challenging the Aquaculture Industry on Sustainability* 19 (2008).

itly on environmental and social sustainability. The Gold Standard has been designed as efficiently as possible to ensure that it is both credible and practical. As a result, systems that follow the Gold Standard will comply with all established international design standards, will certify only sustainable operations and will provide economic benefits to producers over the long term. Through comprehensive consideration of effects on the environment, society, human health, and animal welfare, scientific standard-setting, careful controls on certification decisions, transparent review and reporting on performance, and robust objections procedures, consumers can be assured that Gold Standard-compliant ecolabels will successfully translate their rigorous standards into sustainable practices. Existing labels can also use the Gold Standard to evaluate their institutional design. These labels may improve the credibility of their systems by adopting elements of the Gold Standard.

The Gold Standard is based on the four elements of ecolabel design: (i) scope; (ii) governance structure; (iii) standards; and (iv) implementation methodology. Every ecolabel—based on sustainability or not—must consider each of these elements in order to design processes and substantive standards that are credible and offer incentives for producers to participate. The recommendations included for each of these elements in the Gold Standard are designed for optimal operation of a working sustainable aquaculture ecolabel given these requirements. The Gold Standard is a workable, comprehensive design framework for those who propose to create an ecolabel for aquaculture products. It uses sustainability as the minimum requirement for certification because only with substantively sustainable standards will aquaculture live up to its promise without causing undue harm.

The Gold Standard

The creation of a working ecolabel requires a precise delineation of the scope and goals the label will attempt to achieve. This scoping determination permits the development of the three fundamental elements of ecolabel structure, including governance bodies, standard-setting procedures and resultant standards (including principles, criteria, and indicators), and implementation systems. In this Gold Standard, “standards” include principles, criteria, and indicators; specific terms are used where appropriate. This Gold Standard provides the optimal design recommendations for each of these design criteria.

A. Scope

Clear delineation of the scope of the ecolabel is necessary at the outset of a labeling program to ensure that stakeholders and designers understand the goals for which the label is created. Ecolabel scoping requires identification of relevant impacts and stakeholders and establishment of benchmarks for stringency of standards.

1. Develop a Written Scoping Document

The first task of a potential label should be to develop an explicit statement of principles. This statement should have several components, including:

- Identification of the impacts the ecolabel will address.
- Stakeholder groups that are affected by those impacts
- Stringency of standards to be adopted
- Key principles for ecolabel operation, including participation, transparency, and accountability
- Definitions of sustainability and other key terms.

If desired, the principles may also identify global requirements for certified entities, such as the use of management systems and legal compliance.

2. Address all significant effects of aquaculture production and processing

The general principles should address all significant types of social and environmental impacts (including harms to human health) caused by aquaculture production, including but not limited to:

- Siting conflicts, including interference with other uses of land and waters, including ecosystem services
- Workers’ and indigenous persons’ rights
- Feedstocks
- Chemicals and antibiotics
- Wastes
- Disease
- Escapes
- Animal welfare
- Human health
- Greenhouse gas releases

Failure to address significant impacts is likely to negatively affect the credibility of both standards and the ecolabel as a whole. Decisions to exclude impacts may be acceptable if they are adequately addressed through other mechanisms, such as international conventions. Ecolabels should provide justifications for excluding known categories of impacts.

3. Incorporate social, environmental, and economic stakeholders

The creation of an ecolabel to address a broad range of impacts requires inclusion of a similarly broad array of stakeholder groups from the label’s creation. These stakeholders should be consulted in the identification of impacts and structural elements of the label. Key stakeholder groups include:

- Producers
 - Large-scale (e.g. Marine Harvest)

- Small-scale (e.g. family-farming operators)
- Supply Chain
 - Retail
 - Processing
- Environmental NGOs
- Community/Social NGOs
- Consumer groups
- Wild-capture fishery representatives (due to significant interaction)
- Independent Bodies (independent experts)
 - Academics
 - Multilateral organizations

Ecolabels are non-state, market driven structures that are designed to operate independently from government regulation to produce environmental and social benefits by voluntary, market-driven means rather than by prescription. As a result, the inclusion of government representatives as a protected interest group may distort the intentions and credibility of the ecolabel system as a whole. Multilateral organizations, including but not limited to FAO and the World Bank, do not raise the same issues and may therefore be valuable contributors or supporters due to their interest in developing programs for aquaculture.

4. Incorporate stakeholders from both developed and developing countries

A credible sustainable aquaculture certification organization requires engagement by producers and NGOs in developing countries, as many common species—notably shrimp and pangasius—are primarily produced in small scale operations in developing countries and the inclusion of these parties is vital for the credibility of the system.

5. Adopt sustainability as the baseline for stringency

In addition to identifying the important impacts of aquaculture production, scoping requires explicit delineation of the intended stringency of standards; if significant impacts are excluded, the reasons for the exclusion should be explicitly identified. Clarity of goals at the time of creation will reduce contention later in the labeling process. The scoping document

for a comprehensive ecolabel should require that certification be based on environmental, social, and economic sustainability rather than on feasibility or current industry practice. Determination of sustainability should be based on the best available science, as determined by the Technical Advisory Board and implemented through appropriate criteria and indicators. Where current production practices are already sustainable, anti-backsliding provisions are required. Where scientific information is incomplete, the Gold Standard adopts a precautionary approach, calling for the TAB to determine standards that err on the side of caution and allowing indicators to evolve as more complete information becomes available.

B. Governance

Ecolabel governance must be credible, incorporating all stakeholder groups in a balanced manner. Where not dictated by objective evidence, decisions must be based on consensus (as defined by the ISO), made within a prescribed time period, and made by accountable entities. Where consensus cannot be achieved within prescribed time limitations, the ecolabel's founding documents may allow decisions based on majority rule. The recommended governance structures meet these requirements and comply with all relevant international standards. While other institutional designs may also be credible, these recommendations are based on a comparative study of the strengths and weaknesses of past ecolabel design initiatives and are designed to be effective in the aquaculture context. In particular, this design is intended to achieve two goals: development of standards based on the best available science and consistent certification that produces the desired results in production facilities.

GENERAL ASSEMBLY

1. Engage stakeholders through a membership structure

The participation of members in ecolabel governance increases the label's credibility while also providing an ongoing

forum that can be used to leverage the expertise of committed and diverse stakeholder groups during standard-setting. Limited membership fees, tiered based on ability to pay, can be used to offset the costs of operating the membership structure but should not be used to support the label's other operations. Tiered membership fees, however, should not result in limited opportunity to participate in ecolabel governance.

2. Create a general assembly with limited governance responsibilities

A general assembly with annual meetings provides a consistent forum to promote stakeholder communication and seek feedback on ecolabel activities. The general assembly should have explicit powers to:

- Elect the ecolabel's board of directors
- Make substantive recommendations to the board, independently or at the board's request, which the board must consider.

Delegation of additional powers to the assembly—notably, the sole power to alter the ecolabel's principles—is not recommended, as the debate required to achieve consensus may result in costly mechanisms. All board activities should rely on consensus (not unanimity), as defined by ISO and the ISEAL Alliance, and should be constrained by time limitations.

3. Require balanced membership and powers in the assembly

The assembly should include members from each of the stakeholder groups. Voting power for board elections should be normalized to take account of differences in the representation by each stakeholder group. The use of membership chambers is recommended to simplify this operation. The FSC system offers a model for establishing chambers and normalizing voting power by chamber. Membership chambers should include producers, supply chain interests, environmental interests, and social interests. Other interest groups, such as consumer groups and academics, should apply for membership in the most appropriate chamber. Each chamber should elect its own representatives for the board independ-

ently. In addition, the assembly as a whole should elect the independent board members, as nominated by the board.

BOARD OF DIRECTORS

1. Require balanced representation in the board of directors

The board should consist of one member from each assembly chamber and the CEO of the label. Independent members, from both developed and developing countries, should also be appointed to the board by the Assembly based on consensus. Membership of uninterested parties is vital to the board's transparency, and the inclusion of all stakeholder groups in their appointment ensures credibility. The board should include at least four independent members.

2. Limit size of board and term length of its members

The board of directors should include between nine and twelve members, each of whom should serve a two year term. Re-election of incumbents should be permitted for up to three terms to provide continuity between boards. If a staggered election process is used, half of the board should be elected each year.

3. Provide board with broad responsibilities

The board should be permitted to establish subcommittees as needed to carry out its responsibilities, but approval of their actions by the whole board is important to ensure accountability. The board of directors should have broad responsibilities, including:

- Final decisions on standards
- Financial decisions
- Strategic decisions
- Oversight of the secretariat
- Approval of technical advisory board and objections panel members

4. Require the board to consider technical and stakeholder input

As part of its mandate, the board and its subcommittees should be required to consider the technical advice and stakeholder input provided by the technical advisory board and assembly, respectively. This consideration should be “on the record” to provide transparency. Procedures for consideration and response to comments from the assembly and technical advisory board should be created as part of the board’s bylaws.

5. Create a board subcommittee for standard-setting

A board subcommittee for standard-setting carries out the development of principles, criteria, and indicators in most ecolabels. In the Gold Standard, the substantive content of indicators is determined by the technical advisory board. The board’s standards subcommittee is responsible for translating that substantive input into implementable indicators, as well as phrasing principles and criteria to carry out the label’s purpose, as stated in its scoping document. The standards subcommittee should be balanced by interest group and should rely on the secretariat’s standards unit for procedural support.

SECRETARIAT

1. Develop a secretariat to manage the ecolabel on a day-to-day basis

The secretariat houses the ecolabel’s permanent executive staff. It should be an independent organization led by a chief executive, who is also a member of its board of directors. The secretariat is responsible for overseeing development and implementation of the ecolabel’s standards, consulting with facilities considering certification, evaluating performance by certified entities, and developing markets for labeled products. The secretariat should carry out these diverse tasks through a separate standards unit, producer unit, and business unit. Other units may be developed as needed.

2. Establish secretariat as a global presence with consumers and producers

As part of its producer unit, the secretariat should establish offices in each of the major aquaculture-producing regions to

aid in compliance and adoption of indicators on a local level. Offices in Asia and Central/South America are of particular relevance. The majority of production occurs in China, with substantial additional production in Southeast Asia and the Indian subcontinent. Other species are produced in large quantities in the Americas (e.g. salmon, mollusks), so an office in the Americas is similarly important, depending on the species certified.

Offices in Europe, North America, and Asia (primarily Japan) are also important from a business perspective. The secretariat’s business unit must focus on these markets to develop retailer support for market access and consumer recognition of the label.

3. Evaluate and report on the environmental and social performance of indicators

Existing ecolabels face a major challenge in determining whether standards based on sustainability are being translated into sustainable performance on the ground. The Gold Standard recommends the use of the secretariat to determine whether certification decisions based on existing indicators are producing environmental and social benefits. The standards unit, with data from the producer unit and certification body, can effectively evaluate how indicators translate into performance due to their experience in consultation and standard-setting, respectively. The secretariat should use this data to create a rigorous annual report on ecolabel success, both providing metrics for evaluation of success and identifying areas where the effectiveness of indicators could be improved through revision of the indicator or certification body guidelines.

4. Centralize management to minimize cost and ensure consistency across operations

The use of independent national initiatives may be costly and may result in inconsistent application of criteria and indicators. While national standards and labels have been developed, none of these efforts are credible enough to serve as a preexisting national initiative for a Gold Standard-compliant labeling system. exists for aquaculture, so the development of national initiatives is not advisable. Instead, the ecolabel’s

management should be centralized to minimize costs and should provide central oversight over global operations to ensure consistency.

TECHNICAL ADVISORY BOARD

1. Create a standing, independent technical advisory board

The secretariat should establish and recruit members for a standing, independent technical advisory board composed of independent experts specializing in environmental sciences, sociology, and economics. These experts may be drawn from academia, government, or multilateral organizations, but should be free of conflicts of interest, including financial interest in the content of ecolabel standards. Sources of funding for members' research should be disclosed to the board prior to appointment to the technical advisory board. The inclusion of experts who may have some conflicts is acceptable if approved by the board.

2. Authorize the technical advisory board to provide objective measures of sustainability

The Technical Advisory Board's expertise, independence, and objectivity should be uniquely suited to the determination of the substantive requirements for sustainability. The board's responsibilities should therefore include:

- Provision of objective, peer-reviewed information regarding the requirements for sustainable standards (criteria or indicators, as appropriate)
- Advice to the board on initiation of standard-setting or review of existing standards.

The board's decision-making process should be transparent and objective. Where members do not agree on the contents required for sustainability, the board should apply a precautionary approach to determine requirements for certification. The board's decisions should govern standards development by the secretariat and board subcommittees unless the board of directors votes to reject a technical board finding.

3. Authorize the technical advisory board to create sub-panels

The production of each species in aquaculture has unique implications for sustainability. As a result, the technical advisory board should be authorized to create sub-panels composed of scientific experts on particular species and their impacts. These sub-panels should be authorized to determine the scientific measures of sustainability, but responsibility for the approval of these measures remains with the technical advisory board as a whole, as in the ISO system.

OBJECTIONS PANEL

1. Create an independent objections panel

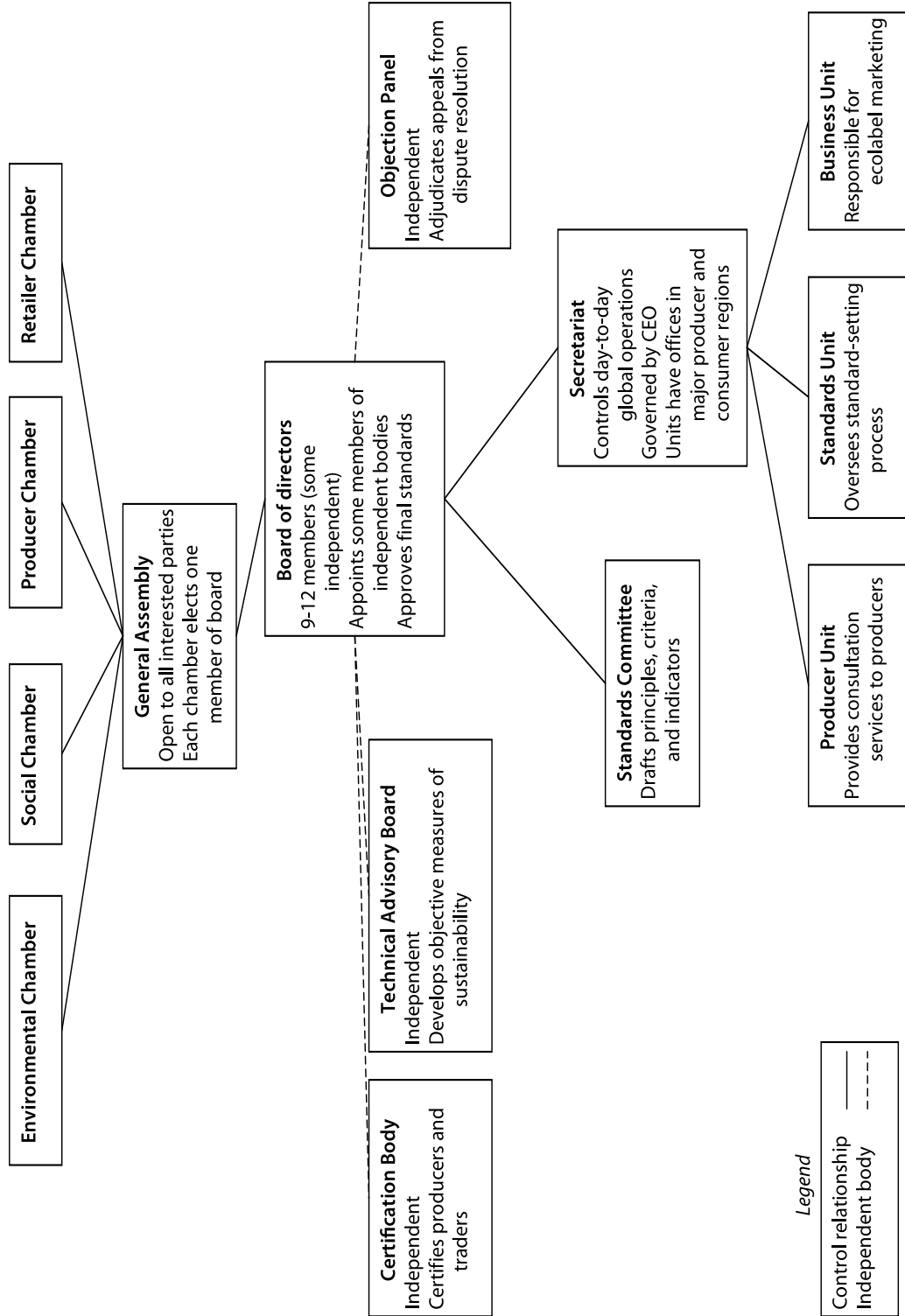
Effective review of grievances is an important element of credible governance structures. The creation of a standing, independent objections panel is the most transparent system to ensure the credible review of grievances and is likely to be required by FAO guidelines. The panel's membership should be independent from all operations of the ecolabel but approved by the board to ensure accountability. Panel members should serve three year terms, but be eligible for reappointment. Decisions of the independent objections panel must be final.

2. Allow secretariat to review and address grievances prior to appeal to panel

The secretariat should be the locus for initially reviewing and addressing grievances. The secretariat is subject to stakeholder control through the board of directors and therefore is accountable and offers fewer conflict of interest concerns than certification bodies. In addition, the secretariat is not directly composed of stakeholders and makes no final decisions on approval or content of standards. Therefore, it is more suitable than a board subcommittee for reviewing substantive disagreements.

The initial secretariat review is intended to promote efficient dispute resolution, permitting some flexibility with respect to format and rules of decision. Where initial review does not

Figure 1: Gold Standard Organizational Structure



resolve a difference, however, all complainants must be permitted to appeal to the formal objections panel to ensure the credibility of the dispute resolution process.

3. Allow stakeholders to challenge procedure and substance of standard-setting and certification decisions

Accountability fundamentally requires that stakeholders be permitted to challenge both substantive determinations and the procedures used to reach those determinations. Ecolabels should create a process for challenges based on both avenues for both determination of standards and certification decisions.

4. Allow external organizations to object even if they are not members

Membership is not a credible way to limit access to the dispute resolution process. Instead, any interested individual, organization, or multilateral entity should be permitted to lodge a complaint. Some limits on access are needed to avoid frivolous complaints, however. Limits should be tied to active participation in the decision-making process through a requirement for complainants to have submitted comments during the public comment phase of standard-setting or certification, as appropriate. Exceptions to the participation requirement should be allowed on a case by case basis where good cause is shown.

C. Standard-Setting

With a credible, efficient governance system in place, ecolabels can develop and implement credible standard-setting systems. All standard-setting should be based on written procedures. Ecolabels should develop three layers of standards, including overarching principles, criteria determining how each principle applies to particular impacts, and indicators that provide objective measures of compliance with each criterion that can be directly applied during certification. In this report, “standard” is used in a general sense to refer to all three of these levels. The specifics of standard-setting will differ depending on the type of standard under development or

review. As a result, where more specificity is desired, a more specific term is used.

1. Comply with the ISEAL Alliance Code of Practice

The ISEAL Alliance has set forth a Code of Practice for Standard Setting that specifies minimum practices for the creation of credible standards. Gold Standard ecolabels should comply with the requirements of the Code, which is based on balanced and consensual decision-making and incorporates minimum standards for participation, transparency, and accountability.

2. Use explicit standard-setting processes

All standard-setting (including creation of criteria and indicators, as appropriate) should be based on explicit, public procedures for standard-setting. The use of this document is vital to the transparency and accountability of the standard-setting process. The processes should be used to develop both the ecolabel’s guiding principles and standards and the criteria and/or indicators used to apply them. The processes must be developed and published prior to the initiation of standard-setting.

3. Use the Technical Advisory Board to determine stringency of criteria and indicators

Where sustainability can be measured by the technical advisory board (TAB), the board’s standards committee must rely on the TAB determination when determining standards. Where the TAB cannot directly measure sustainability, however, it should provide baseline stringency determinations that reflect the TAB’s estimate of minimum standards given the state of scientific knowledge. In such cases, the standards committee must rely on those baselines, which provide minimum stringency measures. It can, however, increase the stringency of such standards beyond the minimum level established by the TAB.

4. Base standards on both process and performance

Credible standards for assessment of the impacts of aquaculture production require consideration of both processes and actual performance. Process standards require the adoption

of record-keeping and other necessary elements of effective and reviewable management systems. Performance standards are objective, verifiable measurements of the results obtained during the operation of facilities. The principles adopted should explicitly recognize that performance standards are required in addition to considering existing process standards in relevant areas, including environmental performance, quality, food safety, and occupational health and safety. Where possible, standards should avoid mandating the adoption of specific mechanisms for achieving sustainable levels of performance, in order to encourage innovation and allow facilities to reduce the costs of compliance: the use of certain techniques should not serve as a proxy for performance levels absent compelling justification.

5. Develop indicators on a species or species-group basis

Ecolabel must create indicators that elaborate on its global principles and criteria to enable certification bodies to evaluate producers. Indicators should be created for each species or group of related species (e.g. shrimp, tilapia), rather than on a country-by-country or regional basis. Production processes and impacts vary widely by species, and sustainable practices are unlikely to change based on geography. Ecolabels, however, must require compliance with national laws to comply with international standards. While such compliance may require producers to undertake more rigorous actions than are required by the ecolabel, this outcome is unlikely because the aquaculture industry is generally under-regulated.

6. Centralize development of principles, criteria, and indicators

The use of centralized standard-setting processes is the best way to create indicators for use during conformity assessment. Reliance on decentralized systems risks the development of inconsistent standards and indicators and increases costs. Centralized development can and should require input from stakeholders in specific regions. This requirement can be fulfilled through species-by-species indicator development, particularly as the production of many species is and should be localized based on the native ranges of species in production.

7. Allow secretariat to develop guidance

Even though the standard-setting procedure should be overseen by the ecolabel's central bodies, it will be a lengthy process requiring multiple rounds of consultation, drafting, public comment, and revision. As a result, a less formal method for development of guidance is needed. The secretariat's standard-setting unit should therefore be empowered to create guidance documents to enable quick responses to new developments in the aquaculture industry, such as the introduction of novel vegetable-based feeds.

D. Implementation

The third element of ecolabeling systems is the implementation methodology, which applies indicators at the production facility or processor level. Ecolabels use certification bodies to apply their indicators via set processes for facility evaluation.

UNITS OF CERTIFICATION

1. Establish individual facilities as the unit of certification

The appropriate unit of certification for aquaculture production is the single facility. Much like farm certification for agriculture labeling, aquaculture facilities are generally self-contained and many of their impacts can be measured effectively at each facility. This does not mean that impacts with cumulative effects—such as habitat modification—should not be considered; to the contrary, these factors can and should be explicitly considered on the individual level. Partial certification of facilities should not be allowed.

2. Provide for small-scale producer and group certification

Many aquaculture facilities, particularly in the developing world, are small, family-run operations. These facilities lack the institutional capabilities that are available to their large-scale peers. The cumulative impacts of these small producers are nonetheless extensive and they should be encouraged to

undergo conformity assessment. The aquaculture ecolabel should therefore develop group certification methodologies to permit certification of numerous producers on a collective basis and should consider providing monetary or in-kind assistance (through the secretariat's producer unit) to groups seeking certification. This procedure should be modeled on that used by the FSC, which has proven effective. The Fairtrade system also provides a model for creation of democratic systems to share costs and benefits of group certification.

3. Provide for provisional certification prior to construction of new facilities

Sustainability is a high bar for certification that will require the use of cutting-edge producer technologies. The potential expense of such systems may not be worthwhile for some producers unless they can determine prior to construction whether their facility is likely to be eligible for certification or whether certification may increase profit margins. Pre-certification would therefore be useful to evaluate siting and other variables. In such cases, full certification would still be required following construction.

4. Develop chain-of-custody certification

In addition to producer certification, the Gold Standard label must include traceability provisions. To that end, a chain-of-custody certification should be introduced to trace cultured fish from producer to table. While primarily intended to ensure that labeled products at retail originated with certified producers, traceability standards also offer opportunities for certification of food safety standards and greenhouse gas emissions associated with transportation. These elements represent opportunities to add substantive value to chain-of-custody certification, but the label should be careful to limit its liability for labeled products that prove unsafe. Use of existing ISO food quality management system standards may prove useful in this context.

CERTIFICATION BODY

1. Create a pilot-scale independent certification body

At least at a pilot scale, conformity assessment should preferentially be carried out by a single, specialized certification body that is independent from but may be purposefully created to carry out certification for the ecolabel. While subject to some credibility challenge, a system modeled on the Fairtrade Labelling Organization's certification body would conform to international standards. Other labels use similar systems, including the Global Aquaculture Alliance and Rainforest Alliance. Benefits from such a system would include consistent certification decisions, elimination of pressures for the certification body to reduce the rigor of certification, cost limitation, and simplification of the certification process through elimination of the accreditation requirement. These benefits outweigh the potential credibility shortfalls of such a system in the short term. In addition, this system can be used to grow the ecolabel slowly, allowing an evolution of practices and requirements as the label and its certifier gain experience for each species and facility type.

As the label expands, demand for certification services may require the use of a free-market certification system similar to that used by the Forest Stewardship Council and Marine Stewardship Council. A free-market model may therefore be used either at the outset or due to expansion in the number of species and facilities eligible for certification. This model requires accreditation of all certification bodies to ensure compliance with international standards. Accreditation should be carefully monitored due to recent recognition that existing accreditation system processes may not be credible. The preexisting single-party certification body may evolve to handle accreditation when the ecolabel shifts to a free-market system. Use of an existing accreditation body would also be acceptable, but would require care to ensure that accreditation is sufficient to ensure consistency across geographic regions and facility types.

2. Establish protections for certification body independence and consistency

Credibility losses in a single-certification-body system can be minimized by establishing firewalls to protect the independence of the certification body and its employees from the sec-

retariat. The certification body should be legally and financially independent from the ecolabel, although the entities may share a parent organization. In addition, certification personnel should be barred from producer consultation, standard-setting, or grievance determinations, instead leaving these duties to the secretariat's producer unit. The certification body should also review its employees periodically for conflicts of interest.

ASSESSMENT PROCESS

1. Create credible, explicit procedures for certification

The certification process, like the standard-setting process, should follow set procedures that have been developed in compliance with the ecolabel's standard-setting procedures and the ISEAL Alliance Code of Practice.

2. Use preassessment, assessment, and review for certification

An efficient certification process proceeds through three phases, including preassessment, assessment, and review. This three-step process encourages producers to participate while also providing credibility.

3. Carry out confidential, streamlined preassessment

Preassessment is not intended to be onerous, but rather to encourage producers to participate by providing them with a basic understanding of their standing vis-à-vis the standard for a low cost. Preassessment should therefore be confidential and inexpensive. It should occur after an initial consultation with the secretariat's producer unit, which can provide assistance with achieving the standard but which must remain independent from the certification process.

4. Develop credible assessment processes that require on-site consultation

In comparison with preassessment, the assessment process must be transparent and should include stakeholder input. The importance of developing-world producers in the aquaculture context demands on-site meetings with local commu-

nities, which are unlikely to have access to internet-based comment outlets. Public comment periods should antedate issuance of initial audit reports, and audit reports should explicitly address all stakeholder comments. The initial audit report should be opened for public comment, and the final report should be publicly available and subject to review should an objection be lodged. Effective systems require objections to be filed within set time periods and provide time limits on the completion of review by the objections panel. The MSC objections process is a good model for aquaculture certification.

5. Allow limited conditional certification

In the best case, producers will comply fully prior to certification audits as the result of assistance from the secretariat's producer unit. This is unlikely in all cases, however—particularly in developing countries. Where major violations of criteria are discovered during the audit, certification should be denied. However, minor violations that can be redressed quickly need not foreclose certification. Conditional certification may therefore be permitted, with compliance to be assessed during the following year's audit. If conditions are not met at that time, certification should be revoked.

6. Audit producers and processors annually

Inspections are important for ensuring that certified facilities remain in compliance. These audits should occur at least annually, either as part of a full recertification process or independently, and ideally would be unscheduled or be performed on short notice. Audits should include solicitation of comments for the facility. Audits should be used to determine compliance with conditions on certification, and additional minor violations discovered during audits must be remediated before the next year's audit. Discovery of major violations may result in revocation of the facility's certificate.

Full recertification may occur annually or after up to five years. Within these limits, the timing of recertification should vary by species in accordance with predicted developments in technological sophistication. Thus, for species that are developing quickly, recertification should be required on a shorter

term than for species for which production practices are relatively stable.

7. Collect performance data and report to secretariat

The certification body plays an important role in ensuring that the ecolabel's indicators translate into effective on-the-

ground performance. The certification body's inspections during the certification and audit processes allow for data collection across all of the ecolabel's indicators. All performance metrics should be collected and reported to the secretariat's standards unit for use in that body's annual report on performance.

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